U.S. Department of the Interior
Bureau of Land Management

Lava Ridge Wind Project

Final Environmental Impact Statement

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Appendix 14. Summary of Public Comments on the Draft Environmental Impact Statement - Part 1

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U.S. Department of the Interior
Bureau of Land Management

In Cooperation with:

National Park Service
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
State of Idaho
Jerome County
Lincoln County
Minidoka County

Mission

The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.

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ABBREVIATIONS

ARMPA	2015 *Idaho and Southern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment*
AUM	animal unit month
AVERT	AVoided Emissions and geneRation Tool
BLM	Bureau of Land Management
CBD	Center for Biological Diversity
EIS	environmental impact statement
EMF	electromagnetic frequencies
EPA	U.S. Environmental Protection Agency
ESPA	Eastern Snake River Plain Aquifer
FLPMA	Federal Land Policy and Management Act
FOIA	Freedom of Information Act
GHG	greenhouse gas
HPMP	historic properties management plan
IPCC	Intergovernmental Panel on Climate Change
KOP	key observation point
MVE	Magic Valley Energy , LLC
NOA	notice of availability
NEPA	National Environmental Policy Act
NHS	national historic site
PA	programmatic agreement
SFO	Shoshone Field Office
VRM	Visual Resource Management
WNS	white nose syndrome
WRC	war relocation center

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1 DRAFT ENVIRONMENTAL IMPACT STATEMENT PUBLIC INVOLVEMENT PROCESS

Public involvement is an integral part of the National Environmental Policy Act (NEPA) process and is required in the preparation and implementation of agencies' NEPA procedures. The Bureau of Land Management (BLM) published a notice of availability (NOA) for the draft environmental impact statement (EIS) for the Lava Ridge Wind Project (the project) in the *Federal Register* on January 20, 2023 (BLM 2023a). Advertisement of the NOA is detailed in Appendix B. This notice began a 60-day public comment period, which was extended to 90 days and ended on April 20, 2023. The BLM held public meetings on the draft EIS in February and March 2023 (Table 1-1). Meetings were held virtually and in person in Shoshone and Twin Falls, Idaho; Portland, Oregon; and Mercer Island, Washington. Advertisement and details of the public comment period, public comment period extension, and public comment closing are detailed in Appendix C.

Details concerning dates, times, and locations of the meetings were announced through local news media, newspapers, email, mail, and the BLM project website. The initial notification at the beginning of the comment period included 2,567 direct emails and 255 hard copy mailers sent via the U.S. Postal Service. See Appendix C for the full hard copy mailers. Comments on the draft EIS were received by email and by mail, through the BLM project website, and at public meetings. A transcriptionist was present at meetings to document verbal comments for the project record.

Table 1-1. Public Meeting Dates and Locations

Meeting	Date	Location
Public orientation meeting	February 1, 2023	Virtual
Public open house meeting #1	February 22, 2023	Shoshone, Idaho
Public open house meeting #2	February 23, 2023	Twin Falls, Idaho
Public open house meeting #3	February 24, 2023	Virtual
Public open house meeting #4	March 1, 2023	Portland, Oregon
Public open house meeting #5	March 2, 2023	Mercer Island, Washington

The virtual meeting was recorded and made available on the BLM project website: https://eplanning.blm.gov/eplanning-ui/project/2013782/570. The virtual meeting presentation slides were used to create posters displayed during the open house meetings. Appendix D details all materials provided during the open house meetings. Appendix E details virtual and open house meeting presentation slides. Appendix F provides hard copies of the posters displayed during the open house meetings. Appendix G provides sign-in-sheets and attendee reports of the virtual and open house meetings. A summary of the project's prior public involvement efforts is in the scoping report (SWCA Environmental Consultants 2021), which is also available on the BLM project website: https://eplanning.blm.gov/public_projects/2013782/200493266/20052044/250058227/LavaRidgeWindEIS_ScopingReport.pdf.

2 PUBLIC COMMENT OVERVIEW

The BLM received a total of 11,194 submissions during the public comment period (Table 2-1)[1]. The BLM reviewed and responded to public comment submissions via revisions to the EIS. The counts of unique submissions within this report were accurate at the time the report was produced (May 2024).

Table 2-1. Submittals by Type

Submittal Type*	Number of Submittals	Percentage of Total Submittals
Form copy	6,536	58%
Unique	3,489	31%
Form plus	887	8%
Duplicate	282	3%
Total	**11,194**	**100%**

* *Unique* letters are submittals with unique content. *Form* letters are submittals from multiple entities or individuals containing identical or similar content; *form copy* letters are submittals that have the same text as a form letter, and *form plus* letters are submittals that have additional unique content in addition to the form letter content. *Duplicate* submittals are duplicates of a unique letter.

2.1 Respondent Affiliations

In all, 119 submissions came from commenters who indicated they were representing an organization, business, Tribal Nation or Tribal entity, or government agency. All other submissions came from unaffiliated individuals. Note: individuals who provided their business title or employer information in their letter or testimony but did not state that they were an official representative were counted as unaffiliated individuals. Several organizations provided submissions with comments or signatures from their members. These are included in the submissions count discussed above.

The Tribal Nations/Tribal entities, businesses, organizations, and governmental agencies that submitted comments are shown in Table 2-2.

Table 2-2. Respondent Affiliations

Organization Type	Organizations	
Tribe Nations/Tribal entities	Shoshone-Bannock Tribes	Upper Snake River Tribes Foundation
Businesses and organizations	A select group of livestock permittees within the Star Lake Allotment A&B Irrigation District Action for the Climate Emergency Audubon Rockies Bainbridge Island Japanese American Community Bainbridge Island Japanese American Exclusion Memorial Association Basin and Range Watch Big Wood Canal Company and American Falls Reservoir District No. 2	Japanese American Museum of Oregon Japanese Ancestral Society Jerome County Airport Advisory Board Jerome County Farm Bureau KG Land & Livestock Inc Kirton McConkie Law Laborers' Union Local #155 Latah County Historical Society Legalectric, Inc. Magic Valley ATV Riders Inc. Minidoka Pilgrimage Planning Committee

[1] A *submission* is defined as a single email, letter, webform submission, or speaker in written transcripts.

Organization Type	Organizations	
	BlueRibbon Coalition	National Parks Conservation Association
	Boise Valley Japanese American Citizens League	National Trust for Historic Preservation
	Casey Stevenson Farms	Northside Canal Company, Ltd.
	Cassia County Noxious Weed Control	Oneida Farms Inc.
	Clean Energy Opportunity for Idaho	Oregon Physicians for Social Responsibility
	Coalition to Protect America's National Parks	Oregon-California Trails Association
	Crop Jet Aviation	Portland Japanese American Citizens League
	DENSHO, The Japanese American Legacy Project	Prairie Falcon Audubon
	Dietrick Quick Response Unit, Inc.	Prescott Land & Livestock
	Eubanks & Associates, PLLC c/o Stop Lava Ridge, Inc.	Preservation Idaho
	Friends of Minidoka	Red Baron Agricultural Service Inc.
	Gooding-Lincoln County Farm Bureau	Robert Jones Realty, Inc.
	Grow Show	Sawtooth Conservation & Recreation Alliance, Inc.
	Heart Mountain Wyoming Foundation	Silver Creek Community Preservation Initiative
	High Desert Pointing Dog Club	Southern Idaho Regional Communications Center
	Idaho Agricultural Aviation Association	Sportsmen for Fish and Wildlife
	Idaho Cattle Association	Stop Lava Ridge
	Idaho Chukar Foundation	Stop Lava Ridge Community Committee
	Idaho Conservation League	The Idaho Association of Noxious Weed Control Superintendents
	Idaho Energy Freedom Advisory Council	The Nature Conservancy
	Idaho Falconers Association	The Park Professional, LLC
	Idaho House	Trout Unlimited, Angler Conservation Program
	Idaho Noxious Weed Control Association	Tsuru For Solidarity / Friends of Minidoka
	Idaho Wildlife Federation	Tule Lake Committee
	Idaho Wool Growers Association	Tuna Canyon Detention Station Coalition
	J N Livestock	Twin Cities Japanese American Citizens League
	Japanese American Citizens League	Walsworth & Associates
	Japanese American Citizens League, DC Chapter	Western Watersheds Project
	Japanese American Citizens League, Idaho Falls	Westlake Associates, Inc.
	Japanese American Community	Wildlands Defense
Government agencies and government officials	A&B Irrigation District	Raul R. Labrador, State of Idaho, Attorney General
	Boise National Forest, Idaho City Ranger District	Representative Mike Simpson, U.S. House of Representatives
	Cassia County Board of Commissioners	Representative Steven Miller, Idaho House of Representatives, District 26A
	City Council of Bainbridge Island	Representative Ted Hill, Idaho House of Representatives
	City of Eden, Idaho	Richard Stover, State of Idaho, Office of Energy and Mineral Resources*
	Dietrich Highway District #5	Senator Glenneda Zuiderveld, Idaho State Senator
	Gooding County Board of Commissioners	Senator James E. Risch, U.S. Senate
	Governor Brad Little, State of Idaho	Senator Mike Crapo, U.S. Senate
	Hillsdale Highway District	Shoshone Highway District #2
	Idaho House of Representatives, District 26A	State of Idaho House of Representatives
	Idaho Transportation Department Division of Aeronautics	State of Idaho Office of Energy and Mineral Resources*
	Jason Parker, Tri-County Noxious Weed Control	Twin Falls County Board of Commissioners
	Jerome County Board of Commissioners*	Twin Falls County Republican Central Committee
	Kimama Highway District	
	Kitsap County Board of Commissioners	
	Kitsap County Board of Commissioners	

Organization Type	Organizations	
	Lieutenant Governor Scott Bedke, State of Idaho	U.S. Environmental Protection Agency, Region 10
	Lincoln County Board of Commissioners*	Washington County Board of Commissioners
	Minidoka County Board of Commissioners*	
	Minidoka County Highway District	
	National Park Service*	

* Cooperating agency.

2.2 Comment Categories

Within each submission, individual comments (i.e., stand-alone comments that relate to a single issue, idea, or conclusion) were identified and grouped into one or more of the following categories listed in Table 2-3. Comment categories were either defined by individual resources that may be affected by the project, individual elements of the project, or specific phases and aspects of the EIS or NEPA process (see Table 2-3). Categories are intended to describe the main topic or resource that is discussed in the comment, regardless of whether the comment is expressing opposition or support for the project as it relates to that topic. Any comments identified in form letters were categorized only once and counted as a single comment no matter how many form letters with that same comment were submitted.

Table 2-3. Comment Categories

Category	Topics	
Issue or resource topics	Air quality	Minidoka War Relocation Center and Minidoka National Historic Site
	Avian and bat species, including greater sage-grouse and eagles	Noise
	Climate and greenhouse gases	Paleontological resources
	Cultural resources and Native American concerns	Pollinators and insects, including BLM special-status bumble bees, St. Anthony sand dune tiger beetle, and monarch butterfly
	Environmental justice and socioeconomics	Recreation
	Fire and fuels management	Soils
	Geology and mineral resources	Transportation
	Hazardous materials and solid waste	Vegetation
	Human health and safety	Visual resources
	Issues analyzed in brief	Water and wetland resources
	Land use and realty, including aviation	Wildlife, including big game, pygmy rabbit, amphibians, general wildlife, and special-status species
	Livestock grazing	
Project element topics	Mitigation or minimization	Plan of development – Appendix 1
	Applicant's interests and objectives	
EIS/NEPA process topics	Alternatives	Decision process for the National Park Service
	Consultation and coordination	Legal or policy compliance
	Cumulative effects	Public and stakeholder involvement
	Decision process	Purpose and need

The BLM reviewed and responded to public comments via revisions to the EIS. See Appendix A for all substantive public comments received and the BLM's comment responses. To-date, 3,288 total individual substantive (further defined below) comments were identified from the various submissions and were categorized, as shown in Table 2-4. Two thirds of all comments (66%) fell into the following top 11

categories: concerns about the project affecting the Minidoka War Relocation Center (WRC) or Minidoka National Historic Site (NHS), potential impacts to wells and the aquifer, mitigation or minimization, environmental justice, socioeconomics, the plan of development, avian and bat impacts, legal or policy compliance, requests for extension of the public comment period or public involvement, alternatives, general wildlife, and comments out of scope of this project's evaluation.

Table 2-4. Substantive Comments Received by Comment Category

Comment Category	No. Comments Received	% Total Comments
Minidoka WRC and Minidoka NHS	468	14%
Water and wetland resources	260	8%
Out of scope	213	6%
Avian and bat species	201	6%
Mitigation or minimization	199	6%
Plan of development – Appendix 1	187	6%
Environmental justice, socioeconomics, and Areas of Critical Environmental Concern	174	5%
Public and stakeholder involvement	134	4%
Legal or policy compliance	112	3%
Wildlife	108	3%
Alternatives	104	3%
Cultural resources and Native American concerns	92	3%
Livestock grazing	89	3%
Aviation	85	3%
Visual resources	73	2%
Greater sage-grouse	63	2%
Geology and minerals	59	2%
Cumulative effects	52	2%
Human health and safety	50	2%
Transportation	49	1%
Noise	46	1%
Recreation	42	1%
Climate and greenhouse gases	38	1%
Attention	37	1%
Big game species	37	1%
Pollinators and insects	36	1%
Vegetation	35	1%
Eagles	34	1%
Editorial	31	< 1%
Fire and fuels management	28	< 1%
Hazardous materials and solid waste	26	< 1%
Air quality	23	< 1%

Comment Category	No. Comments Received	% Total Comments
Land use and realty	19	< 1%
Issues analyzed in brief	18	< 1%
Consultation and coordination	16	< 1%
Purpose and need	13	< 1%
Applicant's interests and objectives	12	< 1%
Soils	12	< 1%
Decision process	6	< 1%
Decision process for the National Park Service	4	< 1%
Paleontological resources	3	< 1%
Total	**3,288**	100.00%

3 SUBSTANTIVE COMMENT SUMMARIES

3.1 Identification of Substantive Comments

The BLM considered comments within each submitted letter and determined if comments were substantive or non-substantive. In performing this analysis, the BLM relied on Section 6.9.2 (Comments) in the BLM NEPA Handbook H-1790-1 (BLM 2008) to determine what constituted a substantive comment. All substantive comments are responded to in this report.

Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS.
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis.
- Present new information relevant to the analysis.
- Present reasonable alternatives other than those analyzed in the EIS.
- Cause changes or revisions in one or more of the alternatives.

Additionally, the BLM NEPA Handbook (BLM 2008) identifies the following types of substantive comments:

- Comments on the adequacy of the analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are considered substantive; they may or may not lead to changes in the final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the BLM Authorized Officer responsible for preparing the EIS does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments that identify new impacts, alternatives, or mitigation measures: Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that the draft did not address are considered substantive. This type of comment requires the BLM Authorized Officer to determine if it warrants further consideration; if so, he or she must determine if the new impacts, new alternatives, or new mitigation measures should be analyzed in the final EIS, in a supplement to the draft EIS, or in a completely revised and recirculated draft EIS.
- Disagreements with significance determinations: Comments that directly or indirectly question, with a reasonable basis, determinations on the severity of impacts are considered substantive. A reevaluation of these determinations may be warranted and may lead to changes in the final EIS. If, after reevaluation, the BLM Authorized Officer does not think that a change is warranted, the BLM's response should provide the rationale for that conclusion.

Comments that are not considered substantive include the following:

- Comments in favor of or against the Proposed Action or alternatives without reasoning that meets the criteria listed above, such as "we disagree with Alternative B and believe the BLM should select Alternative A."

- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above, such as "more grazing should be permitted."
- Comments that do not pertain to the project area or the project, such as "the government should eliminate all dams" when the project is about a grazing permit.
- Comments that take the form of vague, open-ended questions.

In response to substantive comments, the BLM could do the following:

- Modify alternatives, including the Proposed Action.
- Develop and evaluate alternatives not previously given detailed consideration by the agency.
- Supplement, improve, or modify its analyses.
- Make factual corrections.
- Explain why the comments do not warrant further agency response, citing appropriate sources or authorities.

Within each submission, there could be substantive comments and non-substantive comments. Comments that merely expressed an opinion for or against the project were not identified as requiring a response because they meet the BLM NEPA Handbook (BLM 2008) definition for a non-substantive comment. Though not substantive, there were 1,910 comments in opposition to the project and 976 in support of the project. Many comments received throughout the comment analysis process expressed personal opinions or preferences, did not provide relevance to the adequacy or accuracy of the draft EIS, or represented commentary on management actions that are outside the scope of the EIS. These comments did not provide specific information to assist the BLM in making a change to the existing action alternatives, did not suggest new alternatives, and did not take issue with methods used in the draft EIS; the BLM did not address these comments further in this document.

The BLM read, analyzed, and considered all comments of a personal or philosophical nature and all opinions, feelings, and preferences for one element or one alternative over another. Because such comments were not substantive, the BLM did not respond to them. It is also important to note that although the BLM reviewed and considered all comments, none were counted as votes. The NEPA public comment period is neither an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

From the 3,489 unique and 887 form plus submissions, 3,288 substantive comments were identified. Sections 3.2 through 3.4 provide a summary of the substantive comments received by comment category. The information in these sections represents a brief summary of the comments from the perspective of the commentors. The information provided does not provide an in-depth review and assessment of the facts and context for the comments. The information in these sections is only intended to provide the reader with an understanding of the information that was included in the comments, and it should not be considered as a factual conclusion of the information provided in the draft EIS.

Appendix A includes all substantive comments with a BLM response for each substantive comment. The responses were informed by subject matter expert review; recommended additional studies, data, or scientific literature; and changes to the EIS made between draft and final.

3.2 Issue or Resource Topics

3.2.1 Air Quality

Comments on air quality centered around the adequacy of the construction emissions analysis. Commenters proposed adding additional information to improve the accuracy of the construction emissions impacts analysis; reanalyzing emissions using different methods; disclosing levels of avoided emissions; verifying the validity of the data used to calculate sulfur oxide emissions; disclosing potential impacts of sulfur oxides, dust, and other pollutants on nearby communities (such as human health impacts or visibility along roads); and verifying compliance with the BLM Visual Resource Management Class II airshed and the Craters of the Moon National Monument and Preserve Prevention of Significant Deterioration Class I area. One commenter suggested using a dust and emissions control plan with sufficient level of detail to implement proposed mitigation measures in the *Air Quality Technical Report for the Lava Ridge Wind Project* (SWCA Environmental Consultants 2022) to assure the public that the impacts to air quality would not be significant.

3.2.2 Avian and Bat Species

3.2.2.1 BATS

3.2.2.1.1 Lack of Baseline Data/Need for More Data

Commenters expressed concern that the draft EIS did not include enough references and baseline data to complete a rigorous analysis of bat impacts for a project the size and scale of the Lava Ridge Wind Project. Many commenters indicated the draft EIS underestimated bat mortality as well as potential impacts due to data quality issues. They noted the data were of poor quality and often outdated, and biased, making it very difficult to estimate impacts including potential mortality from turbines. For example, comments noted that during the first year of acoustic bat surveys, the detectors were placed on towers 5 feet above ground level, rather than at the typical 10-foot height; although this was corrected during the second year of monitoring, commenters interpreted it as a way to reduce potential impacts as calls are muffled by vegetation on the ground and bats often fly at higher elevation, which reduced the number of bat detections. Comments also criticized baseline bat datasets and expressed concern that they minimized bat impacts. Commenters recommended conducting additional baseline studies of species use and migration patterns prior to project approval rather than following the results of postconstruction monitoring, as currently stated in the draft EIS. Commenters also expressed concern that the mitigation and adaptive management measures are uncertain and nebulous and lack commitments for reducing impacts until postconstruction monitoring has been completed.

3.2.2.1.2 Townsend's Big-Eared Bat

Commenters noted the Townsend's big-eared bat should be given a more in-depth impact review in the draft EIS because it is a BLM sensitive species and the most commonly recorded species within the BLM Shoshone Field Office (SFO) planning area (64% of bat calls identified in the siting corridors were Townsend's big-eared bats) and Craters of the Moon National Monument and Preserve. Commenters noted that these bats forage widely in the Snake River Plain; use lava tubes, vents, craters, and caves like those found in the siting corridors as roosting habitat; and have a known maternity colony near the siting corridors as well. Commenters expressed concern that the analysis of potential impacts to the Townsend's big-eared bat was grossly insufficient because it was not even included in the detailed analysis, and commenters suggested the BLM rethink this exclusion and complete a detailed analysis for the species for inclusion in the final EIS.

3.2.2.1.3 Cumulative Impacts

Comments expressed concern about the analysis of cumulative bat population impacts from the proposed Taurus Wind and Salmon Falls Wind Projects in combination with the project and white nose syndrome (WNS) and the potential impacts of the project when considered in conjunction with WNS. Commenters expressed concern that there may be additional population-level impacts to bat populations from numerous wind facilities with high bat morality rates (the Taurus Wind and Salmon Falls Wind Projects are similar in size to the project) given the Snake River Plain is home to a multitude of bat species, many of them declining potentially due to the proliferation of wind energy developments in the West. Similarly, commenters did not agree with the analysis of WNS impacts and argued that WNS is a serious threat to bats and likely to affect bats in Idaho soon. Commenters criticized the BLM's conclusions, specifically that the BLM is unsure about how bat mortality may be impacted by the project and the role that WNS plays with respect to bat impacts. Comments suggested that it is the BLM's responsibility to look at the project in conjunction with WNS when calculating impacts and not to simply claim there is too much uncertainty to predict impacts.

3.2.2.1.4 Lack of Coordination with Local Bat Experts

Commenters raised a concern that neither the BLM nor MVE collaborated with local bat experts at Minidoka National Wildlife Refuge, Craters of the Moon National Monument and Preserve, and other Idaho bat working groups to better understand local roosts and hibernacula as well as ongoing bat research projects. Comments suggested local knowledge of how bats use habitats on the Snake River Plain would be integral to micrositing turbines and other project components, as well as applying protection measures such as buffers around roosting site and hibernacula if they are known.

3.2.2.1.5 Inaccurate/Misinterpreted Data and Overstatement of Fatality Risk

Comments included corrections to draft EIS text about bats that was viewed as inaccurate, misstated, or misinterpreted by the BLM; these corrections would avoid further misinterpretation and faulty conclusions. Comments stated the BLM's bat analysis seemed to be based on incomplete data, incorrect understanding of references, and overstatements of risk to bats using the siting corridors. They suggested correcting these flaws will improve the bat analysis by making it consistent with current scientific literature and actual bat use of the siting corridors, which the commenters stated lack hibernacula, surface water, and foraging opportunities. The comments noted that there is little mention of the environmental protection measures MVE has committed to, which include blade feathering, 1,000-foot setbacks for turbines from canals, avoiding riparian areas, and minimizing outdoor lighting. The commenters emphasized the bat fatality estimates do not take those measures into account.

3.2.2.2 BIRDS

Comments regarding birds expressed concerns related to underestimated take of birds in the draft EIS, species-specific analyses (or lack thereof), and cumulative impacts from regional wind projects on bird populations. There were many comments or questions about the impact analysis to birds, particularly about the accuracy of the data (i.e., 2-year avian studies, modeling, and comparison to other wind projects) and missing information (e.g., seasonal variations in bird populations, migration routes and flyways, population-level impacts, direct impacts from noise and light). Many commenters requested the final EIS adjust species-specific analyses or requested specific species be analyzed in detail. Finally, many comments expressed that the cumulative analysis of impacts to birds is inadequate and fails to consider many avian species, habitat fragmentation/loss, and regional wind project impacts on bird populations. Additionally, some comments provided new information to add to the final EIS, suggested revisions in the draft EIS, or suggested mitigation measures (e.g., facility siting, painting turbine blades,

fully analyzing impacts on birds in a supplemental EIS, preconstruction surveys for all species). Conversely, some commenters noted the applicant-committed measures would avoid and minimize population-level impacts to some species analyzed in detail and recommended that these species be analyzed in brief.

3.2.2.3 EAGLES

Comments received about eagles were primarily opposed to eagle take resulting from the project and indicated the analysis in the draft EIS underestimates the impacts to eagles. Commenters expressed concern that the analysis in the draft EIS did not adequately analyze indirect reduction of progeny from eagle take; indirect impacts related to eagle relocation into other critical raptor habitats (thereby increasing competition); indirect impacts related to an increase in farm pests, like voles; and cumulative impacts from existing and future wind projects in the region. Other commenters expressed disagreement or confusion with the terms and conditions of the incidental take permit; lamented being unable to see eagles in the future; or proposed avoidance, minimization, or mitigation measures to include in the final EIS.

3.2.2.4 GREATER SAGE-GROUSE

3.2.2.4.1 Lek and Population Data

Comments regarding leks and greater sage-grouse population estimates addressed the lack of baseline data and the inadequacy of surveys for a project the size, scale, and duration of the Lava Ridge Wind Project. Commenters criticized the reliance upon the desktop habitat assessment conducted by MVE and on aerial and ground surveys, which focused on known lek locations that had been recently active. They noted this survey method would miss any new leks in other areas of the project because it did not survey any areas distant from known leks. More specifically, commenters raised concern that the draft EIS identifies eight leks within 6.8 miles of the siting corridors that have "undetermined" management status. Commenters noted the BLM must apply the required protective lek buffers identified in the 2015 *Idaho and Southern Montana Grater Sage-Grouse Approved Resource Management Plan Amendment* (ARMPA) (BLM 2015) to all leks, including the eight undetermined leks. Comments stated that leaving a lek as undetermined makes buffer application impossible because lek designations per the ARMPA are active, inactive, occupied, unoccupied; therefore, the BLM cannot cite ARMPA compliance with undetermined leks because it is inconsistent with the ARMPA itself. Commenters cited the results of *Center for Biological Diversity* [CBD], *Western Watersheds Project, and Wildearth Guardians vs. United States Bureau of Land Management* 2023 (CBD et al. vs. BLM 2023), which determined that insufficient information, by definition, is not a valid reason for not designating the lek occupancy. Finally, commenters noted that nearly all leks with "undetermined" status are near the siting corridors, which puts them at risk of severe impacts from noise, dust, predation, habitat loss, etc. Commenters suggested this is a violation of the ARMPA, which requires NEPA to address all applicable management direction, including the application of appropriate lek buffers.

3.2.2.4.2 Noise Impacts

Comments focused on the inadequate analysis of noise impacts on greater sage-grouse due to increased road use, noting that the draft EIS estimates over 2 million vehicle trips associated with construction, operation and maintenance, and decommissioning. Commenters noted the BLM offers little to no analysis of the impacts a massive network of heavily trafficked roads (both new and existing) will have on greater sage-grouse outside the lek buffer. They expressed that the BLM does not offer any analysis as to what these impacts would be beyond generalized observations and quantification of functional habitat loss for greater sage-grouse. Commenters recommended the BLM add analysis of how roads impact population,

especially in the Desert Important Habitat Management Areas, Priority Habitat Management Areas/Sagebrush Focal Areas where population triggers were hit in 2018 and 2019. Additionally, commenters noted the BLM did not fully analyze the impacts of chronic widespread noise from construction at the population level. Comments stated that population-level impacts from noise could cause both lower female attendance at leks because they cannot hear males and avoidance of leks by males in areas where noise levels are high; population declines and regional extinctions could result and exacerbate already steeply declining populations of greater sage-grouse.

3.2.2.4.3 Seasonal Habitat Impacts

Commenters focused on the fact that the BLM does not adequately analyze population-level impacts to seasonal habitat, specifically summer (late-brood rearing) and winter habitat. They noted lek buffers and mitigation are only addressed for spring (breeding/early brood rearing) habitat and are lacking for summer/winter habitat. Commenters stated that spring habitats being impacted by the project are already fragmented and plagued by connectivity issues and expressed concerns that further fragmentation and disturbance within summer and winter habitat will likely eliminate whatever greater sage-grouse habitat remains.

3.2.2.4.4 Implications of CBD et al. vs. BLM

Commenters focused on the outcome of CBD et al. vs. BLM (2023), which ruled that the BLM approval of the Caldwell Canyon Phosphate Mine failed to adequately address impacts to greater sage-grouse, greater sage-grouse habitat, and habitat connectivity. Based on the outcome of the case, the comments suggested that impacts on sage-grouse habitat and populations were not included in the draft EIS, including functional habitat loss, risk of extirpation, connectivity between sage-grouse populations, and cumulative impacts.

3.2.2.4.5 Compensatory Mitigation

Commenters expressed concern about the lack of information included in the draft EIS about compensatory mitigation to offset unavoidable (residual) impacts on greater sage-grouse such as wildfire, climate change, mitigation plan failures, timing delays, durability, and the additive nature of projects.

3.2.3 Climate and Greenhouse Gases

Comments received about climate and greenhouse gas (GHG) emissions centered on the adequacy of the emissions analysis and suggestions to refine the analysis. Commenters noted that draft EIS failed to analyze sulfur hexafluoride and water vapor emissions, emissions from the manufacture of wind turbine components and infrastructure, transport of materials (from cradle-to-grave), and emissions associated with decommissioning and disposal (including any emissions from retired infrastructure). Commenters also expressed that the draft EIS underestimates emissions from construction (such as personnel travel and equipment) as well as the potential impacts to carbon sequestration in the landscape. Some commenters were concerned the draft EIS did not adequately analyze impacts to micro-climates from wind turbines (especially on rangeland productivity and local airsheds), loss of energy production during energy transmission and from turbines being taken offline for maintenance, or a premature facility shut-down scenario. Finally, some commenters noted the Social Cost of Greenhouse Gas data in Table 3.4-5 and 3.4-6 of the draft EIS do not include information for all alternatives, and the data are "unquantified and uncertain."

Commenters also noted issues with the AVoided Emissions and geneRation Tool (AVERT) dataset (i.e., an error in the decommissioning emission model) and requested clarity on the Intergovernmental Panel on

Climate Change (IPCC) model used in the draft EIS to calculate GHG avoidance costs and benefits. Commenters suggested adding in the new Council on Environmental Quality interim NEPA guidance for the consideration of GHG emissions and climate change and data from the IPCC's March 2023 *Synthesis Report of the IPCC Sixth Assessment Report* (IPCC 2023).

Commenters were interested in comparing emissions from the project with other types of energy projects such as hydropower, wind, and natural gas. They wanted to know what power source the project is replacing, the associated avoided emissions, and the initial carbon investment of the project and its long-term avoided emissions compared to the No Action alternative. Some commenters also expressed that the cumulative impact analysis needs to include other renewable projects and risks to project infrastructure from climate change, such as risks from extreme weather events and impacts to the electrical grid and turbines.

Commenters expressed concern about the "greenness" of the project given that wind turbine parts are made with fossil fuels, transported across the globe with fossil fuels, and operated and maintained with them as well.

3.2.4 Cultural Resources and Native American Concerns

Comments expressed that the BLM did not adequately consult with local Tribes, Japanese Alaskans, Japanese Americans, and Alaska Native groups; identified revisions or resources to be analyzed in the final EIS; or expressed concern with the draft programmatic agreement (PA) and mitigation measures.

Regarding consultation with Tribes and the Japanese American community, commenters specifically noted the BLM failed to adequately engage Tribes and Japanese Alaskans; noted that only 17% of the area of potential effects was surveyed; and expressed concerns related to potential treaty violations, irreversible damages or loss of cultural resources, viewshed impacts to Minidoka WRC (referred to as the Hunt Relocation Center during World War II) and Minidoka NHS, presence of traditional cultural properties (TCPs), and inclusion of traditional ecological knowledge.

Commenters suggested revisions and additions to the final EIS, including revisions to the analysis of impacts to Wilson Butte Cave and Minidoka NHS, expanded information about TCPs (e.g., Minidoka WRC), and conformance with the BLM SFO's 1986 *Monument Resource Management Plan*, as amended (BLM 1986). Comments also identified several resources that were not analyzed in the draft EIS, such as the Milner-Gooding Canal, Milner Ruts, the Kelton Freight Line Trail, the Oregon Trail, historic sheep trails (e.g., Wendell trail system), communities (e.g., Owinza), National Park Service (NPS) properties, and Indian Sacred Sites (under Executive Order 13007).

Regarding the PA, commenters criticized the phased survey approach proposed in the PA and the lack of PA and historic properties management plan (HPMP) in the draft EIS. Comments suggested minor revisions to the PA, requested a final version of the PA and HPMP be included in the final EIS, and noted that the BLM failed to engage Tribes and Japanese Americans to identify appropriate mitigation and avoidance measures. Many commenters expressed interest in ethnographic interviews prior to the finalization of the final EIS rather than as a compensatory mitigation measure. Other proposed mitigation measures included on-site archaeological monitors during construction, agreements between MVE and Tribes and the Japanese American community, increased noise setbacks from 2.2 miles to 6.5 miles, and recognizing ancestral lands in the final EIS.

3.2.5 Environmental Justice, Socioeconomics, and Areas of Critical Environmental Concern

3.2.5.1 ENVIRONMENTAL JUSTICE

3.2.5.1.1 Community Outreach

Several commenters noted inadequate outreach to impacted communities (Japanese Americans, Native Americans, Alaska Natives, Hispanic, low-income populations) both early on and throughout the EIS process. Commenters raised concerns that the BLM did not make a good faith effort to reach these communities and engage in meaningful discussions on project impacts. Multiple comments referenced Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) and Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency). Several comments discussed a lack of EIS documents translated to Spanish and difficulty obtaining Spanish documents even though there are significant Spanish-speaking populations within the environmental justice analysis area.

3.2.5.1.2 Inadequate Analysis

Comments emphasized an overall inadequate environmental justice analysis and unacceptable impacts to environmental justice communities. Many commenters noted the draft EIS did not specifically address impacts to Alaska Natives or Japanese Alaskans, and that the BLM should conduct a health impact assessment on these communities and all members of the public. Three additional tools for assessing impacts to environmental justice communities were recommended by the U.S. Environmental Protection Agency (EPA) and other commenters: the EPA Environmental Justice Screening and Mapping Tool, EPA Promising Practices for Environmental Justice Methodologies in NEPA Reviews tool, and the BLM's Vulnerability Model. One commenter specifically referenced several deficiencies in the draft EIS's Existing and Future Trends and Actions section relating to the Japanese American community as a dispersed environmental justice community under Executive Order 13985 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government). Several commenters questioned the cultural competency of the BLM and consultants and their ability to meaningfully engage with environmental justice communities, especially Japanese Americans. Additionally, commenters stated that the cumulative effects analysis did not consider COVID-related hate crimes on the Japanese American community.

3.2.5.1.3 Minidoka National Historic Site

Most of the comments regarding Minidoka NHS emphasized the irreversible impacts to the site and the disproportionately high and adverse impacts to the Japanese American community and questioned the BLM's preferred alternatives in light of these impacts. Many commenters wrote in support of the proposed Greater Minidoka Area of Critical Environmental Concern and the additional protections it would give to the culturally important landscape surrounding Minidoka NHS. Many commenters questioned the visual methodology and analysis in the draft EIS. Several commenters referenced the Indigenous Sacred Sites memorandum of understanding from Secretary Haaland (U.S. Department of the Interior et al. 2021), and one commenter referenced the BLM's Instruction Memorandum IM 2022-59. See also Section 3.2.13, Minidoka War Relocation Center and Minidoka National Historic Site.

3.2.5.2 SOCIOECONOMICS

Comments centered on a lack of benefits to local communities while other states and investors benefit. Commenters wanted to see a cost-benefit analysis of the entire project in relation to local economies over

the life of the project. Many commenters noted an inadequate analysis in the draft EIS of potential adverse impacts to property values, the livestock grazing economy, agriculture, the local supply chain for construction materials, local employment rates, and local airports. Regarding property values and the livestock grazing economy, multiple commenters questioned why mitigation measures or compensation were not included in the draft EIS for decreased home values and loss of animal unit months due to the project. Several comments focused on the potential adverse impacts to schools, roads, emergency services, the housing market, and local communities from temporary workers associated with the construction and decommissioning of the project. A few commenters expressed concern about the reliability of the electrical grid and increases in energy costs.

One commenter cited benefits to the local community. Another commenter suggested the EIS analyze benefits to the local and state economies if MVE were to hire locally and in-state rather than assuming out-of-state workers.

3.2.5.3 AREAS OF CRITICAL ENVIRONMENTAL CONCERN

Commenters suggested designating the greater Minidoka area and Minidoka WRC and Minidoka NHS as an Area of Critical Environmental Concern to preserve the cultural and historical values of the land surrounding the Minidoka NHS. Commenters also stated studies and reports have identified Minidoka WRC as a TCP and as being eligible for the National Register of Historic Places, and that this TCP would be part of the Greater Minidoka Area of Critical Environmental Concern nomination process.

3.2.6 Fire and Fuels Management

Most comments on this topic expressed concern that the wind turbines would adversely affect aerial firefighting operations. Commenters were also concerned about the possibility of turbines self-igniting; the difficulty of suppressing turbine fires; increased risk of wildfire from turbines, traffic, or overgrown vegetation; and how the costs associated with wildfire resulting from the project would be paid. Additionally, a few commenters expressed doubts about the adequacy of the fire plan and the width of fire breaks.

3.2.7 Geology and Minerals

Many comments focused on potential blasting impacts to the integrity of the lava bed and lava tubes, paleontological features, and the Wilson Butte Cave. Concerns were raised about blasting triggering seismic activity and whether the turbines could withstand either naturally occurring or induced earthquakes. Many comments also questioned the effects of turbine vibration, vibration and weight of construction vehicles, and weight of concrete turbine bases on the lava bed.

3.2.8 Hazardous Materials and Solid Waste

3.2.8.1 DISPOSAL AND RECYCLING OF WIND TURBINE PARTS

Commenters expressed concern about the quantity of waste generated by the project and whether local landfills would be able to accommodate it. Additionally, commenters shared concerns about the decommissioning process, including whether turbines parts could be recycled, how they would be disposed of (particularly wind turbine blades), and the potential for leaching of chemicals or heavy metals from hazardous materials used to construct the turbines into the soil and aquifer.

3.2.8.2 LEAKS, SPILLS, AND EMISSIONS

Comments expressed concern about the potential for leaks and spills of hazardous chemicals, including oil, into the soil, aquifer, and lava beds.

3.2.9 Human Health and Safety

Comments regarding human health and safety recommended looking at existing wind projects to adequately analyze human health and safety impacts on residents living near turbines. Specific impacts of concern included long-term exposure to vibrations, electromagnetic frequencies (EMFs), noise, shadow flicker, emissions, and chemicals from eroded wind turbines, as well as physical threats such as increased potential for traffic accidents, ice shedding, turbine collapse, stray voltage, disruptions in the power grid, electromagnetic interference, and general safety concerns related to energy transmission projects. Other comments noted that the draft EIS fails to consider significant impacts to public safety facilities, law enforcement, highway safety, and search and rescue providers. Commenters also recommended analyzing impacts to construction workers from blasting activities and to residents who work the night shift during construction activities (because their daytime rest may be affected by the construction noise).

3.2.10 Issues Analyzed in Brief – EIS Appendix 3

At least half of the comments indicated concern about the impact of the turbines on local weather patterns. Specifically, commenters requested analysis of the impact of changed weather on agriculture, vegetation, and wildlife as turbines alter wind speed, local directional flow, temperature, and moisture patterns. Commenters also expressed concern about the impact of the turbines on farming equipment, specifically interference with global positioning systems in farm equipment and the turbines disrupting needed "lines of sight" for equipment. Finally, commenters suggested the BLM consider how vandalism and damage to infrastructure (e.g., due to shooting sports) within the siting corridors would be addressed, and expressed concern that if vandalism becomes an issue, it might necessitate closing public ground to recreation. On a related note, commenters also raised concerns about the potential for an attack on project infrastructure and the need to consider security for the siting corridors via coordination with state and local officials.

3.2.11 Land Use and Realty, including Aviation

Several comments indicated concern for the functionality of the local communication network (including global positioning systems) due to potential electromagnetic interference created by the wind turbines. Commenters also expressed dislike of leasing public land for private business and noted confusion over lease agreements and Idaho state rights. Additionally, comments expressed concern about potential adverse impacts on farmland, loss of soil moisture, and reduction of animal unit months (AUMs).

3.2.11.1 AVIATION

3.2.11.1.1 Economic Impact to Local Airports

Comments noted that if aviation routes were impacted or if pilots decided to reroute based on safety concerns, local airports may experience decreased business, resulting in an adverse economic impact to the surrounding communities.

3.2.11.1.2 Emergency Medical Response

A few comments included that if flight time was added to emergency medical flights (LifeFlight) due to navigating around the siting corridors, it may escalate medical emergencies and increase health risks to patients.

3.2.11.1.3 Firefighting and Agricultural Uses

Many comments questioned if aerial firefighting operations could be successful in the siting corridors due to reduced maneuverability around turbines. Commenters also questioned if crop-dusting operations could be fulfilled because crop-dusting planes must fly at lower elevation for successful product application. A few commenters noted that they use low-flying aircraft to manage and protect livestock herds and are concerned they will not be able to continue this practice.

3.2.11.1.4 Safety Hazards

Comments expressed strong concerns about hazards the turbines would present to aviation: collision with towers, reduction of navigable airspace and challenges to climb gradients, added difficulty in emergency landings and maneuvers, and the possibility of pilot vertigo due to flashing lights. Commenters were also concerned about wind wakes generated by turbines, which could create a roll hazard to light-wing aircraft and helicopters. Additionally, commenters expressed concern that electromagnetic interference may occur with radar and navigation systems and create issues with instrument landings. Comments also included that the Federal Aviation Administration approval has not been obtained, and noted the Federal Aviation Administration had previously concluded the turbines would have an adverse impact on safe aviation.

3.2.12 Livestock Grazing

Many commenters on this topic expressed concerns related to grazing restrictions within allotments, inadequate analysis of grazing impacts, and lack of mitigation measures. Grazing restriction concerns included the permanence and legality of such activities; socioeconomic impacts to displaced permittees and industry; increased risk of wildfire; clarifications related to AUM reductions in the draft EIS; and permanently creating pastures, which would increase forage. Commenters recommended the final EIS should fully analyze potential impacts to livestock (cattle, sheep, etc.) from EMFs, vibrations, blasting and noise, stray voltage, shadow flickering, micro-climate changes, displacement, reduced airplane predator control, forage availability, increased chances of theft along new roads, increased risk of livestock collisions with traffic, impacts to historic sheep trailing, noxious weed invasion, potential long-term impacts after reclamation, and cattle clustering at turbines. Commenters had questions regarding mitigation measures included in the draft EIS and recommended additional mitigation measures, including cattle guards, alternative feed sources, making pastures permanent, information on compensation plans, specifications about troughs and fencing, full data disclosure, compliance and mitigation enforcement and maintenance, incorporating better grazing practices, specifications for grazing rotation timing, and reactivating suspended use AUMs.

3.2.13 Minidoka War Relocation Center and Minidoka National Historic Site

Most of the public comments related to Minidoka WRC and Minidoka NHS focused on the potential adverse impacts the project would have on the overall experience of the Minidoka WRC. Commenters explained that seeing and hearing operational wind turbines would detract from the experience, making it difficult to become fully immersed in the environment that is fundamental to the character of the site. Commenters noted that the impact of isolation and loneliness is essential to the historical and educational

values of the site, and the project would undermine these values. Comments emphasized that those impacted by wrongful incarceration at Minidoka WRC deserve to honor their histories at the site as it was, with landscape and viewshed preservation to maintain the site's integrity. Additionally, commenters noted that Minidoka NHS has become a pilgrimage site where healing and community building occur, and the visual and auditory intrusion of the project would destroy the solemnity of the site and hinder the ability to reflect and remember.

Commenters expressed that analyzing Minidoka NHS primarily as a site visited by tourists and recreationists is insensitive and minimizes the cultural significance of the site. Comments stated that Minidoka survivors and descendants of survivors should not be categorized as tourists and asked that this be corrected.

Commenters expressed concern that the "moderate" visual impacts to Minidoka were underestimated and questioned the accuracy of the visual simulations. Several letters included concern for visual impacts specifically from the location of the Honor Roll. Commenters highlighted that the turbines would be visible and audible from the Honor Roll, would be more significant than portrayed, and would dishonor Japanese Americans who served in the U.S. Army during World War II. Additionally, commenters raised concern that the turbines would create a distraction during somber commemorative events.

3.2.13.1 PROJECT OPPOSITION BECAUSE OF MINIDOKA WAR RELOCATION CENTER AND MINIDOKA NATIONAL HISTORIC SITE

Many letters from the public conveyed general opposition to the project based on impacts to Minidoka WRC or Minidoka NHS (see Tables A-1 and A-2 in Appendix A). These comments expressed that the sites serve as a reminder of American history that should not be repeated, and the project would be disrespectful to Minidoka WRC survivors, descendants and relatives of survivors, and the Japanese American and Minidoka-connected communities. Many commenters stated that impacts to the viewshed would ruin the sense of isolation, detract from the immersion experience at the site, and make it more difficult to feel connected to their ancestors who were incarcerated there.

Commenters also explained that the alteration to the Minidoka WRC viewshed would show disregard for the sanctity of the site. Many people who commented included that they themselves, or their relatives or friends, were incarcerated at Minidoka WRC or other "Relocation Centers," and feel that by considering this project, the U.S. Government is adding insult to injury. Commenters expressed concern that a federal agency choosing to inflict adverse impacts on Minidoka WRC and Minidoka NHS would be a conscious erasure of Japanese American history and would be unethical and immoral. Commenters also stated that the project proposal comes at a time when racism and discrimination against Asian Americans and Pacific Islanders has greatly increased, and consideration of impacting a site that is so important to the Japanese American community feels as if they are not being supported.

Several comments questioned whether such a project would be considered if there were impacts to a different national historic site or national park. Some commenters noted that they support renewable energy but suggested that the project be moved further away from Minidoka WRC to ensure there is no impact to the site.

3.2.14 Noise

Commenters raised concerns about the long-term effects of noise pollution generated by the turbines, and that the draft EIS does not include thorough analysis of these effects. Commenters raised questions about how long-term effects would disturb and create stress in humans, wildlife, and livestock, with possible economic impacts resulting from stressed livestock (such as decreased milk production). Comments also

discussed the effects noise pollution can have on human health, such as hearing loss, disruption of sleep patterns, and physical effects to organs.

Commenters recommended including a thorough analysis of different frequencies emitted by turbines (infrasound, ultrasound, extreme low frequency) and an analysis of possible effects to wildlife, livestock, and humans from exposure to these frequencies.

Several comments expressed concern at the way noise impacts were analyzed. Noise impacts were not analyzed at ground level or blade level and did not include noise traveling through solid materials such as concrete turbine bases and lava rock. Some commenters also raised concerns that the decibel ratings were inaccurate because the values came from a model, rather than direct measurements.

A small number of comments questioned how daily blasting during construction would affect residents and animals and raised a concern that, in general, the project would exceed noise regulations.

3.2.15 Paleontological Resources

Two comments were received regarding paleontological resources. One comment expressed concerns with potential impacts to undiscovered paleontological resources during construction and the lack of mitigation measures. The other comment requested clarification of the analysis area.

3.2.16 Pollinators and Insects

3.2.16.1 INSECT AND POLLINATOR MORTALITY

Public comments focused on mortality of a large number of insects and pollinators (approximately 40 million) from wind farms. Commenters expressed concern that, despite the acknowledged large-scale impacts to insect and pollinator species, no surveys were conducted, and no compensatory mitigation was proposed in the draft EIS. Commenters also repeatedly pointed out the link between pollinator populations and successful agricultural operations; if populations decrease, there could be wide-ranging adverse impacts on crop productivity and subsequently, economics, which have state and regional implications.

3.2.16.2 NOISE AND VIBRATION IMPACTS

Commenters expressed concern about the potential impact of noise, vibrations, and EMF on terrestrial invertebrates including insects (fleas, ticks, and mites), bees, and earthworms.

3.2.16.3 MONARCH BUTTERFLY

Commenters noted that the draft EIS does not include enough information about planned conservation efforts and methods for the monarch butterfly given the potential adverse impacts to the butterfly's habitat and population.

3.2.16.4 ST. ANTHONY SAND DUNE TIGER BEETLE

Comments provided corrections about how information about the species is presented and the conclusions. Suggested revisions were included to make the draft EIS more accurate and help avoid misinterpretation.

3.2.17 Recreation

Commenters expressed that the draft EIS did not adequately analyze impacts to recreation. Commenters recommended updates and further analysis related to the inventory of existing recreation resources, potential restrictions to access and user conflicts, and increased or decreased recreation opportunities as a result of the project. Commenters expressed interest in a greater analysis of impacts to recreation resources, including indirect effects from other resources such as visual resources and big game displacement. Without knowing the turbine locations and proposed road network, some commenters were concerned that the draft EIS did not adequately account for potential increased public access or potential dust impacts on recreation users.

3.2.18 Soils

Most comments related to soils were concerned with impacts to topsoil, fragile soils, and hydric soils; direct and indirect impacts related to wind erosion and dust; cumulative impacts to soils from grazing and wildfires; and potential mitigation measures. Comments regarding mitigation included clarification for the criteria of restoration success of fragile soils, suggested retiring grazing to reduce cumulative impacts to soils, and suggested a soil health analysis and soil carbon audit to quantify the impacts to topsoil and grassland carbon sequestration abilities. One comment critiqued that the draft EIS soil mitigation relies too heavily on assumptions. There was one comment requesting clarification on the long-term impacts of magnesium chloride (if used for project dust suppression) in the soil.

3.2.19 Transportation

Comments regarding transportation raised concern that the draft EIS did not adequately consider impacts to existing road infrastructure or requested information be added or changed in the final EIS to address these concerns. Commenters primarily expressed concerns with the unknown road designs; adequacy of local roads and highways to handle additional traffic; and accuracy of traffic estimates, timing, and intensity of impacts. Commenters also expressed concerns with impacts related to existing and future public use on new road networks; impacts to BLM travel management rules; and indirect effects such as dust, habitat fragmentation and loss, and cultural impacts. Some comments also expressed concern that the proposed traffic management strategies are too vague or unreliable.

3.2.20 Vegetation

Most comments on vegetation expressed concern that surface disturbance from the project may allow invasive species and non-native species to dominate vegetative communities. Commenters also stated that the mitigation measures for weed control and revegetation were inadequate and needed to provide more detail on plans for preventing, monitoring, and controlling invasive species. Commenters also deemed measures for revegetating with native species unrealistic due to documented difficulties with such plans. Additionally, commenters raised concerns with the use of herbicides including longevity of chemicals in the environment and dangers to grazing animals.

3.2.21 Visual Resources

3.2.21.1 MINIDOKA NATIONAL HISTORIC SITE

There were many comments about the importance of protecting the Minidoka NHS viewshed. Comments expressed that impacts to the viewshed would dishonor the Japanese American community, demonstrate a lack of respect, and detract from the ability to experience the feeling of isolation endured by the people

incarcerated at the site. Additionally, several comments argued that the Minidoka NHS Sensitivity Level Rating should be high instead of moderate.

3.2.21.2 KEY OBSERVATION POINTS PORTRAYAL

Many commenters expressed that the key observation point (KOP) portrayals were a misleading or inaccurate portrayal of the project. Commenters noted the KOPs did not show transmission lines or towers, minimized the size of turbines, or did not use the correct size turbine in the visualization. Commenters expressed a lack of trust in the visual impact analysis due to perceived errors in the KOPs, and several comments included photographs of other turbine projects to demonstrate the difference in appearance between reality and the KOP portrayal.

3.2.21.3 DISLIKE OF TURBINE AESTHETICS

Many comments expressed general dislike of turbine aesthetics and expressed concern that the pristine views of the area would be ruined by their presence. A few comments noted that despite efforts to mitigate the visual appearance of the turbines (such as color), there is no way to successfully lessen the visual impact of the turbines on the landscape.

3.2.21.4 METHODOLOGY

Several commenters disagreed with the methodology used to assess visual impacts and believed the analysis underestimated the true impact. Commenters recommended using the Argonne model and using visual distance zones for 500-kilovolt transmission lines. Additionally, commenters noted that the BLM's *Monument Resource Management Plan* (BLM 1986) did not establish Visual Resource Management (VRM) classes, creating a loophole and allowing the area to be designated VRM IV. They indicated interim VRMs should have been created prior to the assessment.

3.2.21.5 NIGHT SKIES

Several comments expressed concern that the flashing red lights at the top of the turbines would create light pollution and ruin the dark skies of the area. Commenters expressed concern that the Craters of the Moon National Monument and Preserve designation as an International Dark Sky Park may be threatened and that the lights may impact camping experiences along the Oregon Trail.

3.2.22 Water and Wetland Resources

3.2.22.1 BLASTING, DRILLING, AND PHYSICAL INTEGRITY OF AQUIFER

Commenters questioned the impacts of significant blasting and drilling on the integrity of the Eastern Snake River Plain Aquifer (ESPA). Specifically, comments noted the draft EIS includes very little information about the potential impacts of blasting and drilling to install foundations to the underlying hydrogeology (including aquifer structure, percolation, porosity, and connection between aquifers) because no studies have been done to assess blasting at this scale. Comments addressed how water quantity and quality could be impacted during construction and operation and maintenance by contamination from concrete leaching, chemicals, oil spills, diesel fuel, herbicides, and dynamite byproducts including ammonium nitrate. Comments emphasized that the ESPA is the lifeblood of southern Idaho because it provides drinking water, water for agriculture and ranching, and water for industrial uses. Additionally, comments noted there is no compensatory mitigation proposed for aquifer impacts; the only mitigation outlined is in measure bbb, which states that MVE will gain a clear understanding of the local hydrogeology and then closely monitor blasting and excavation to reduce the

potential for contamination of said aquifer. Commenters recommended including evaluation of the potential environmental impacts and emphasized that the proposed mitigation must be effective in addressing those environmental consequences.

Finally, commenters raised questions about whether there will be impacts to the aquifer from the weight of the turbines once they are constructed—specifically, whether the basalt geology and lava tubes could support the weight of 400 turbines following the stress from over 500 days of blasting two times daily.

3.2.22.2 BLASTING AND IMPACTS TO WELLS AND CANALS

Comments focused on the impacts of significant blasting on domestic wells in the siting corridors. Commenters noted that well damage may occur, and there is potential for contamination, which occurred after the 2007 Twin Falls Canal Company blasting project near Kimberly, Idaho, which caused contamination by coliform bacteria to all domestic wells within 0.75 mile of the blast site. If contamination occurs, commenters wanted to know who will pay to clean it up and how the damage will be repaired. Comments noted there is no mitigation proposed and suggested MVE put up a bond to assure landowners that any impacts to domestic wells will be mitigated.

Comments also focused on impacts to the canal system (North Side Main and Milner-Gooding) from blasting and how it could disrupt irrigation to over 150,000 irrigated acres. Commenters raised concerns that blasting near canals could change underground rock structure, open up sink holes in the canals where none previously existed, and drain off much-needed irrigation water. Commenters noted that neither canals nor impacts to them are mentioned in the draft EIS and should be included.

3.2.22.3 IMPACTS TO AQUIFER RECHARGE

Comments focused on the use of aquifer recharge areas (such as the recharge site on the Milner-Gooding Canal, at Milepost 31, and at Wilson Canyon) to replenish the aquifer and the potential for blasting and drilling to impact the potential for recharge if there are changes to underlying lava rock and basalt geology and percolation rates. Commenters noted that different locations in the lava beds take different amounts of water and serve as filters for bacteria-laden waters. Commenters raised concerns that if the underground structure changes, changing porosity and percolation rates, the water may not be slowly filtered through the lava rock and instead travel very rapidly with pollutants in it.

3.2.22.4 SNAKE RIVER WATER RIGHTS

Commenters noted that MVE requires a lot of water for construction, operation, and maintenance of the project. Commenters emphasized the draft EIS woefully underestimates the water needed over 34 years of operations by many magnitudes. Comments questioned where this quantity of water will come from and noted the draft EIS indicates the withdrawals from the aquifer will be insignificant. Commenters noted the Snake River is already over appropriated and 1) there is a moratorium on new groundwater and surface water consumptive water rights, 2) there is already not enough water for existing water right holders, and 3) reliance on leasing or acquiring water rights via the Idaho Water Bank is not likely given they already do not have enough water and would be put in the queue behind senior water right holders seeking to lease water. Commenters raised concerns about MVE's plans to drill six wells as part of the project and noted MVE does not have water rights for this water and their proposed use is too great for an exemption. Commenters wanted to know how MVE will legally acquire the vast quantities of water needed for construction, operation and maintenance, dust control, and other uses.

3.2.22.5 WETLAND IMPACTS

Comments noted that the draft EIS tallies up the impacts to wetlands and water courses (acreages and mileage) but does not include a discussion of the role of these wetlands and water courses in the ecosystem and the environmental impacts expected as a result of the project. Commenters stated that there is no discussion of impacts to wetland species, including those that use seasonal wetlands such as playas. Finally, commenters focused on the fact that the draft EIS says wetlands will be avoided to the extent practicable, but no site-specific wetlands surveys have been completed and would not be until an alternative is selected and the turbines are sited. Commenters raised concerns that this precludes the BLM from taking a "hard look" at impacts to wetlands and surface waters by thoroughly reviewing impacts, demonstrating how water quality targets will be met, and evaluating the effectiveness of proposed best management practices.

3.2.23 Wildlife, including Big Game

Commenters were concerned that the draft EIS did not adequately address impacts to or provide mitigation for wildlife species. Wildlife of concern included migratory wildlife (e.g., mule deer, pronghorn, and elk) and their summer/wintering ranges, ground-dwelling wildlife (e.g., reptiles, rodents, and in particular, the pygmy rabbit), amphibians, fish, and state-listed species. Commenters expressed that the final EIS should fully analyze the impacts related to habitat fragmentation, disruptions in wildlife corridors, displacement, population connectivity, and genetic isolation. Commenters noted the draft EIS failed to analyze direct and indirect effects from noise, vibrations, EMF, blasting, ground current, and exposure to pesticides during noxious weed management. Some commenters requested the final EIS analyze cumulative impacts from wildfires and cumulative effects on grizzly bear and wolves from delisting under the Endangered Species Act. Finally, some commenters suggested refining the analysis with more studies, including new data or information in the final EIS; adjusting mitigation measures to be more realistic, or expressed concern that the data included in the draft EIS had false assumptions. Several commenters lamented wildlife being displaced and asked when wildlife would return to the site.

3.2.23.1 INADEQUATE MITIGATION

Commenters disliked the proposed mitigation because they expressed concern that it did not address or resolve impacts. Comments raised concerns that the BLM violated the mitigation hierarchy (Instruction Memorandum 2021-046 Reinstating the BLM Manual Section (MS-1794) and Handbook (H-1794-1) on Mitigation) that requires avoidance, minimization, and mitigation in that order; instead, the comments described that the BLM seemed to skip avoid and minimize and then use mitigation ineffectively by including vague language.

3.2.23.2 BIG GAME

3.2.23.2.1 Owinza-Gooding Pronghorn Migration

Comments noted the Owinza pronghorn herd uses the wildlife analysis area as part of their winter range and for stopovers during migration. Commenters raised concern that the project would fragment the migration corridor, and thus siting the project in the migration corridor violates U.S. Department of the Interior Secretarial Order 3362, which requires the BLM to conserve big game habitat and migration corridors. Commenters focused on pronghorn behavioral changes that could result from the project, including changes in migration routes, quicker migration, less time at stopover sites (less forage and less high-quality forage for energy), and reduced use of migration corridors. Comments expressed that it is essential to conserve migration corridors because they connect big game seasonal habitats. Comments also suggested that pronghorn may not acclimate to disturbance very easily or very quickly and either

avoid turbines or are displaced by them, which may reduce the functional value of migration in the long term. Comments stated that population-level impacts could result from reduced animal health and fitness, including mortality and a reduction in reproductive success.

3.2.23.2.2 Fencing and Road Impacts

Commenters expressed concern about the number of miles (between 222 and 395 miles) of temporary livestock fencing required for construction and decommissioning. Comments noted that even wildlife-friendly fencing can cause entanglement, death, injuries, habitat fragmentation, and barriers to movement. Comments indicated that pronghorn have fidelity to known crossing sites, and there is concern about impacts to pronghorn. Commenters asked for clarification as to what is meant by "temporary" fencing, i.e., will it be removed after construction is complete and then could be reinstalled during decommissioning, only to be removed again once that is complete? Commenters noted that fencing can alter migration routes, reduce seasonal habitat, and displace big game onto roads where vehicle strikes/collisions could occur. Similar comments were submitted regarding the number of vehicle trips (approximately 2.4 million) and new roads (between 270 and 486 miles) and how these will impact migration corridors and push big game onto roads (leading to collisions/mortality) and into areas where they are not wanted (e.g., into agricultural areas, leading to depredation).

3.2.23.2.3 Lack of Data or the Need for Updated Data

Commenters indicated that the draft EIS did not include adequate data or information about the current conditions and obstacles faced by big game species in the wildlife analysis area, including wildlife-unfriendly fencing, cheatgrass invasion, increasing traffic and development, climate change (including drought), and wildfires. Moreover, commenters expressed distrust in the analysis of big game impacts in the draft EIS because the BLM admits that it is difficult to estimate the type and severity of behavioral impacts of the project on big game when they do not know how big game, specifically mule deer, pronghorn, and elk, will respond. Comments expressed concern that the analysis was inadequate.

Additionally, commenters encouraged the use of updated data, including mule deer migration corridor data as well as population and density data, and the inclusion of a more detailed analysis of project impacts to elk and bighorn sheep. Commenters noted the draft EIS mentions elk hunting but does not discuss impacts to elk migration routes given elk are particularly sensitive to human interference. Comments also stated that the draft EIS does not include any analysis of impacts to bighorn sheep.

3.3 Project Element Topics

3.3.1 Applicant's Interests and Objectives

Commenters expressed concerns that the threat of eminent domain is being used as an intimidation tactic toward private landowners and brought forth historical efforts (other than the proposed project) of the applicant wishing to build within or alongside Minidoka NHS. Comments noted that in the past, MVE has been prevented from building alongside Minidoka NHS. One commenter also suggested that the applicant conduct a feasibility study to acquire a power purchase agreement.

Commenters also inquired who the energy produced by the project would be contracted to and expressed concerns of national security should the project be sold to foreign adversaries. Comments conveyed frustration that the applicant has not disclosed the total cost of the project and power being distributed to other states (for example, California or Nevada), or the total amount of tax credits or incentives received from the government.

Commenters also stated that is it the responsibility of the applicant to fund independent studies to address specific resource issues, and that it is concerning that the applicant has not made an effort to connect with local road departments, highway districts, and other governmental agencies and offices within the community.

3.3.2 Mitigation – EIS Appendix 4

3.3.2.1 ADDITIONAL MITIGATION MEASURES

Comments suggested the inclusion or revision of many of the mitigation measures in the draft EIS. Commenters suggested mitigation measures for wildlife, including those for birds and bats such as painting turbine blades; curtailment strategies; and suggestions for postconstruction fatality monitoring protocols, including timing. Additional wildlife mitigation measures suggested by commenters included those for big game (road maintenance during winter), eagles and raptors (non-toxic lead shot and roadkill removal), and sage-grouse (breeding season timing restrictions for blasting). Other comments suggested mitigation for impacts to the aquifer and wells (compensation if private wells are impacted), lighting (to protect dark skies), restoration/reclamation (utilization of a bond), cultural resources, Treaty Rights, environmental justice communities (additional mitigation needed for permanent impacts), and livestock grazing (compensation for lost grazing, including rangeland improvements).

3.3.2.2 GENERAL MITIGATION CONCERNS

Commenters criticized the inclusion of mitigation measures that indicated that the mitigation would be completed at a later date or time (e.g., the paleontological resources treatment plan will be developed [it is not developed yet] and will mitigate for impacts to paleontological resources from the project). Commenters were adamant that all plans that would be developed to mitigate impacts should be developed before the project is approved to be sure the plans are thoroughly reviewed and deemed adequate. Similarly, comments stated the use of "loose" terminology such as "to the extent practicable, the extent feasible, or if economically feasible" in many of the mitigation measures is vague and non-committal and is a "loophole" for avoiding mitigation altogether. Commenters repeatedly asked how mitigation would be monitored, who would check if mitigation was being done, who will determine when mitigation should be done and if the proposed mitigation fully offsets the impacts, and who determines the criteria for measuring success.

3.3.2.3 MITIGATION IS INADEQUATE

Commenters expressed concern that there was inadequate mitigation proposed for big game, migratory birds, eagles, raptors, sage-grouse, bats, cultural resources, environmental justice communities, and socioeconomics. Overall, commenters viewed the mitigation measures not as clear commitments to offset impacts given the lack of specificity, but instead viewed mitigation as the "let us build it and then we'll see what happens" approach, citing the lack of detailed analysis and baseline resource data in the draft EIS as reinforcing this perspective. Commenters suggested that the studies specific to the siting corridors limited impact analyses in the draft EIS because they resulted in a lack of baseline data. Comments then said it was difficult to formulate effective compensatory mitigation because the impacts are not understood well enough. Finally, commenters noted that the mitigation measures included in the draft EIS often did not offset impacts. For example, commenters asked how proposing an ethnographic study and report for Minidoka NHS offset impacts to the sense of place, viewshed, and historical importance of the site to Japanese Americans from the project? They noted those impacts would be permanent, and the mitigation measure suggested does not offset those impacts. Another example noted in the comments was bat mortality and the proposed mitigation measure to survey abandoned mines and install bat-friendly

gates if in use. Commenters questioned how this survey and the bat-friendly gates would remedy potential population-scale impacts to bats that are already plagued by WNS.

3.3.2.4 OVERLAP OF APPLICANT-COMMITTED AND PROJECT-SPECIFIC MITIGATION

Comments suggested revisions to the proposed mitigation measures and the EIS identified when applicant-committed measures overlap with project-specific mitigation measures that may be required for a specific resource. Specifically, comments suggested changes to measures addressing potential impacts to air quality and dust mitigation; bats (including the bird and bat conservation strategy); co-location of infrastructure within existing energy corridors or in previously disturbed area; sage-grouse; migratory birds, including raptors and burrowing owls (including the bird and bat conservation strategy); big game; insects and pollinators (including bees, worms, and St. Anthony sand dune tiger beetle); EMF; fuel storage; paleontological resources; pesticides (insects and pollinators) and herbicide use (including for noxious weeds); aviation; waters and wetlands; Minidoka NHS and Shoshone-Bannock and Shoshone-Paiute Tribes; elements included in the plan of development (MVE 2022[2]) (e.g., lighting and roads); and vegetation.

3.3.3 Plan of Development – EIS Appendix 1

Comments related to the plan of development (MVE 2022[3]) expressed concerns, questions, or made recommendations related to the project's design, funding, operation, and decommissioning phases. In regard to project design, commenters discussed tower height options, efficiency, back-up power sources, seasonal issues, associated costs, and foundational depths. In regard to the construction phase, commenters requested the final EIS include clear timelines, sources of materials and labor, dust abatement and weed control measures, blasting plan and non-blasting options, stormwater pollution prevention plan details, and associated mitigation impacts. For operations, commenters were concerned about where power will be sold and used, safety (i.e., vandalism, wildfire, law enforcement, and emergency response), erosion and microplastic pollution, compliance enforcement, and dispute resolution. For decommissioning, commenters had concerns related to disposal, compliance enforcement, and reclamation plan details. Many commenters raised concerns surrounding the recyclability of turbine blades and batteries, and the capacity of local infrastructure to accommodate such waste throughout the life of the project.

3.4 NEPA Process Category Topics

3.4.1 Alternatives

3.4.1.1 NEW ALTERNATIVES FOR INCLUSION IN THE DRAFT EIS

The following new alternatives were suggested by commenters:

- Wildlife-friendly alternative: An alternative that would avoid migratory corridors and big game wintering areas (with focus on pronghorn) and greater sage-grouse habitat. Commenters noted there is a narrow band of land within Alternative C where turbines could be sited to avoid impacts to big game and greater sage-grouse.

[2] Since the release of the draft EIS, the POD has been updated. The most current version of the POD is from December 2023. This is provided as final EIS Appendix 1.

[3] See footnote 1.

- Reduced project size, layout, and turbine style alternative: An alternative (or alternatives) that would encompass a smaller siting corridors footprint, include fewer turbines, and use turbines that are shorter to reduce impacts. Commenters suggested the turbines not be sited in mile-long strings and instead be spread out to facilitate micrositing. Comments suggested different turbine types could be used in different parts of the siting corridors to further reduce impacts.
- Operational alternative: An alternative that is not just a variation in the size and location of the siting corridors but instead includes operational differences (e.g., different restrictions for cut-in speeds).
- Disturbance alternative: An alternative that sites the project in already disturbed habitat or in brownfields.
- Phased development alternative: An alternative that phases project development over time while monitoring impacts.

3.4.1.2 INADEQUACIES OF ALTERNATIVES INCLUDED IN THE DRAFT EIS

Commenters noted the following inadequacies with the alternatives included in the draft EIS:

- Commenters suggested that alternatives presented in the draft EIS do not represent a reasonable range of alternatives. They expressed that alternatives should have considered varying turbine heights and turbine designs as well as operational differences; the alternatives are just slight variations of the scale of the project (number of turbines) and the location of the siting corridor.
- Comments stated the analysis comparing alternatives is too simplistic and lacks rigor; a table comparing alternatives should be included (that includes the No Action alternative as well) and to the extent possible, actual turbine locations should be used to compare impacts to resources from each alternative to provide specificity. Comments emphasized the comparison between alternatives in the draft EIS is too general for the hard look required by NEPA.
- Commenters stated that there is no analysis of the No Action alternative (Alternative A) included in the draft EIS. They expressed concern that this makes comparison of the alternatives difficult and not very meaningful; tables that compare the alternatives should include the No Action alternative as well.
- Commenters disagreed with the BLM's decision to not include Alternative H as a viable alternative and suggested that they reconsider the elimination of that alternative, which avoids visual impacts at Minidoka NHS, Minidoka WRC, and Wilson Butte Cave. This alternative was included in the draft EIS at the request of the public and then eliminated. Commenters disagreed with why the BLM eliminated this alternative (they believe the wind speed is adequate given turbine placement and stated that no specific wind studies were done and there is access to transmission). Comments suggested that smaller turbines (reduced height) could be used near Minidoka NHS to avoid visual impacts and ensure the site retains its intended sense of place.
- Comments expressed concern that none of the alternatives include a comprehensive approach to mitigation, particularly as it relates to reducing impacts to environmental resources (e.g., wildlife) and cultural resources (e.g., Minidoka NHS).
- Commenters stated that none of the alternatives reduce environmental impacts to acceptable levels, and that significant impacts are predicted to occur, but those impacts are not minimized with required avoidance, minimization, and mitigation measures in the draft EIS.
- Comments stated the alternatives analysis seems biased toward the Proposed Action. Nearly 10 pages are spent analyzing the impacts of the Proposed Action on each resource, whereas each

alternative may receive a page or less of analysis of impacts per resource. A meaningful comparison between alternatives would require the same level of effort when identifying the impacts of each alternative on various resources.

3.4.1.3 OTHER POTENTIAL WIND TECHNOLOGIES

Commenters provided a list of other wind technologies that could be used in lieu of traditional wind turbines. The list includes vertical windmills, wind panels, air foils, vertical-induced vibration-resonant wind generators, low-profile turbines, and tulip-style turbines.

3.4.1.4 RELOCATION OF THE LAVA RIDGE WIND PROJECT

Comments focused on the relocation of the project closer to the states (Nevada, California) that would use, and benefit from, the power that would be generated. Commenters also suggested the project be built on private lands and viewed the BLM's potential approval of the project as a misuse of public lands. They suggested building in California via repowering turbines that have been abandoned, and in Wyoming.

3.4.2 Consultation and Coordination

Commenters focused on needed coordination with entities, including Tribes, e.g., U.S. Department of Defense, Southern Idaho Regional Communications Center, Shoshone-Paiute Tribes, Indigenous People of Alaska. Additionally, comments focused on Section 106 consultation and the associated PA, including additional requests to be a consulting parties and the need for more information about how the concerns of the Shoshone-Bannock and Shoshone-Paiute Tribes are being (or not being) incorporated into the PA. Commenters also requested the inclusion in the draft EIS of general information about coordination with the U.S. Fish and Wildlife Service and Section 7 consultation. Finally, comments expressed concern about coordination between local (counties), state (legislators, Idaho officials including governor, attorney general) governments, and the BLM with respect to project opposition.

3.4.3 Cumulative Effects

One commenter suggested the BLM should develop a plan that land managers can use to site projects appropriately and minimize impacts on land use, wildlife, housing, transportation, and equity. Commenters also stated the BLM's cumulative impact analyses is inadequate for the scope of the project and expressed concerns over cumulative effects analysis of the aforementioned resources in addition to Minidoka NHS, Alaska Natives, climate change and GHGs, cultural resources, big game winter range, mapped migration and stopover routes, population impacts from golden eagle fatalities, and impediment of fire suppression.

One commenter suggested that archeologists conduct field inventories of cultural resources and provide a full analysis of cumulative impacts for each alternative, taking into account foreseeable energy projects based on pending renewable energy applications such as the Gateway West transmission lines, two West-wide Energy Corridor transmission lines, and Southwest Intertie Project North. Numerous commenters also suggested considering all projects of a similar scope in the cumulative effects analysis.

Commenters stated the cumulative effects analysis for the project does not meet the legal requirements of NEPA, that the BLM should follow the Council on Environmental Quality regulation-based terminology for a more cohesive document and cumulative effects section, and the BLM did not comply with guidance in Instruction Memorandum 2023-013, which states the BLM must conduct inventories and monitoring to identify trends and emerging issues during plan evaluations.

3.4.4 Decision Process

Commenters suggested rigorous decision-making processes (including engagement with local communities, proactively identifying locations that are best suited for renewable energy development) and asked BLM to do its due diligence when making an informed decision. Specifically, comments suggested requiring a longer time period for studies related to resource impacts and not relying on desktop analysis for impacts analysis because this does not adequately support informed decision making.

Commenters also requested the BLM set a clear expiration date for the right-of-way grant, acknowledging the assumed 30-year project limit and that this should include a provision for 2 additional years dedicated to decommissioning and removal. Commenters suggested that if the BLM is unwilling to enforce the 30-year assumption, transparency is necessary regarding the project's potential adverse effects extending beyond 30 years.

3.4.5 Decision Process for the National Park Service

Commenters compared the NPS Organic Act of 1916 and the Federal Land Policy and Management Act (FLPMA) of 1976, stating that in contrast to "BLM's multiple use mandate under FLPMA, the NPS-managed resources at Minidoka NHS are managed and protected under a separate statutory requirement, which is the conservation mandate of the NPS Organic Act of 1916 and subsequent amendments." Commenters also noted that the Secretary of the Interior shall fulfill the mandate of the Organic Act of 1916, conserving Minidoka NHS and the natural scenery and historic objects. Commenters stated that the Minidoka NHS foundation document (NPS 2016) is relevant to the project and should be used in the decision-making process. Commenters recommended the EIS include a standalone section that identifies impacts to Minidoka NHS for each action alternative, to clearly identify impacts to the NPS's ability to carry out its legislated mission at Minidoka NHS.

3.4.6 Legal or Policy Compliance

Commenters stated the draft EIS does not assess, or comply with, the following:

- Applicable land use planning
- Issues raised through scoping and consultation and coordination
- Issues raised through coordination with permittees
- That the U.S. Department of the Interior and the BLM have not followed federal law or fulfilled the responsibilities of 43 United States Code 1712(c)(9)
- FLPMA
- NEPA
- National Historic Preservation Act
- The BLM's Wind Energy Development Program
- Public Law 109-441 (Preservation of Japanese American Confinement Sites)
- Public Law 100-383 (Civil Liberties Act of 1988)
- Organic Act

Commenters also requested the BLM suspend the project and ongoing NEPA and Section 106 consultation to amend the BLM SFO's 1986 *Monument Resource Management Plan*, as amended (BLM

1986), and also suspend the project to await decision on the proposed rule "Conservation and Landscape Health" (BLM 2023b) prior to making a decision on the project.

Commenters also raised concerns regarding compliance with other federal, state, county, and local laws (including zoning laws); connected actions not evaluated in the draft EIS; and concerns regarding the BLM's dominant management culture and its adverse effects on the quality, objectivity, and thoroughness of the NEPA analysis. Commenters also stated approval of the project would be contrary to the BLM's land use management obligation (as the project is "inefficient" and "wasteful") and mission statement, that the draft EIS fails to adequately analyze the wind potential rationale as recommended by the U.S. Department of Energy's Wind Energy Technology Office, and that approval of the project does not consider the BLM's pending Idaho Renewable Energy Strategy.

Lastly, commenters also stated that the BLM should have previously and proactively evaluated the eligibility of the entire WRC for listing on the National Register of Historic Places in accordance with "The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act" (NPS 1998), and that the BLM has violated treaty rights of the Shoshone-Bannock Tribes.

3.4.7 Public and Stakeholder Involvement

Commenters requested 30-, 60-, and 90-day extensions of the public comment period, expressed frustration accessing the draft EIS and in providing comments, and stated that some members of the public are intimidated by the NEPA process. They raised concerns that the legal system and court reporters create more mistrust of the NEPA process, that public outreach efforts to engage Idaho citizens throughout the draft EIS process were insufficient, and that the project is an example of regulatory overreach and circumvents public involvement. Commenters stated that poorly executed public meetings did not allow for adequate and meaningful public comment. Comments also suggested that structured questions be presented at the public meetings and that approval of the project should be subject to a "yes" or "no" vote from the affected communities.

Commenters voiced concerns that it is the BLM's responsibility to assure documents be made available in other languages (such as Basque, Japanese, Portuguese, Spanish, Native American languages, and others) and be provided in alternative formats such as hard copies and audible copies, due to disabilities, limited internet, and lack of computers that support the size and type of the electronic versions of the draft EIS.

Commenters stated that the BLM purposely withheld information regarding Alternative A (No Action) because there was no information adequately represented during the public meetings, and that many members of the public are unaware of this alternative.

Comments also expressed great disappointment in the lack of meaningful engagement and cultural competency from the BLM toward Japanese Americans, stated BLM staff were insensitive to images of imprisoned children in Minidoka WRC, and suggested that cultural competency training within the BLM is warranted for meaningful engagement.

Lastly, commenters brought forth that the BLM failed to notify the affected population in Idaho and the United States (including Japanese Americans) of the project before publication of the NOA, and that the public meeting in Mercer Island, Washington, was held at an inconvenient time and location when there were several historic Japanese American location options in the surrounding area. Commenters also expressed disappointment that BLM staff did not introduce themselves to those reviewing visuals and expressed concern that LS Power employees were not wearing identification badges and also traveling, lodging, and dining with BLM staff.

3.4.8 Purpose and Need

Commenters raised the issue of Idaho's renewable energy deficit, stating that the project will not wholly reduce Idaho's energy deficit, and asked who the money and energy from the project would benefit.

Commenters also expressed concerns that the purpose and need includes no mention of the need to conserve resources and values within the siting corridors and cited sections of FLPMA related to conservation (Section 102 (a)(80 of FLPMA) to support this statement. Commenters also provided suggested iterations of the purpose and need and asked that the BLM revise the purpose and need statement to not only reflect FLPMA's multiple-use mandate, but to also reflect its conservation mandate, which requires the BLM to protect the quality of scenic and historical values (such as Minidoka NHS and WRC). It was also stated that the purpose and need statement should be rewritten to recognize a need to protect the cultural landscapes and scenic viewsheds protected by adjacent NPS land and should include congressional direction related to Minidoka NHS and WRC.

Commenters suggested the BLM provide an explanation in the purpose and need statement for the public to understand how the BLM seeks to balance its renewable energy and project-specific goals against its other codified duties, including the protection and promotion of historically significant properties like Minidoka NHS.

Lastly, commenters also stated that the final EIS should include how much energy is being produced and permitted to reach the goals of Executive Order 14008 as well as policy expressed in 43 United States Code 3004(b), and that the current purpose and need of the project is to combat climate change, offering no evidence in the draft EIS that the project will have a beneficial effect toward climate change.

3.5 Other Topics

3.5.1 Attention

Comments coded to this category included comments specifically asking the BLM to reach out to the commenter, requests to be added to the project mailing list, requests for studies or data used in the draft EIS, and requests for hard copies of the draft EIS.

3.5.2 Editorial

Editorial comments included comments related to technical development of the draft EIS such as grammar, punctuation, spelling, definition, abbreviation, and heading errors.

3.5.3 Out of Scope

Numerous comments received were identified as out of the project scope. The BLM does not provide an issue statement or discussion of consideration during the NEPA process for out-of-scope comments. Out-of-scope comments included the following:

- Other forms of energy such as solar, nuclear, natural gas, and coal
- Relocation of the project to California, Nevada, or other states
- Revise resource management plans across Nevada and other states with full public input, before reviewing and consider approving, renewable energy developers' applications via resource management plan amendments.

4 SUBSTANTIVE COMMENTS AND BUREAU OF LAND MANAGEMENT RESPONSES

As described in Section 3.1, the BLM provides, in Appendix A, responses to substantive comments. In response to substantive comments, the BLM has identified a preferred alternative (described and analyzed in the final EIS); supplemented, improved, or modified the analysis within the EIS, including adding additional issues analyzed in detail; made corrections; or explained why the comments do not warrant EIS revisions.

As stated in Section 3.2.13, commentors submitted numerous comments on the draft EIS regarding Minidoka WRC and Minidoka NHS, and many of the comments included personal accounts and related concerns from descendants of former incarcerees, or former incarcerees themselves (see Section 3.2.13.1). The BLM respectfully acknowledges the additional detail regarding Minidoka WRC and personal experiences related to this important site, and records the information provided for the project. In an effort to most thoughtfully and respectfully respond to the magnitude of comments containing similar statements, concerns, or concepts, and synthesize this information for ease of commentor and public reference, the BLM has compiled a table of recurring themes (see Table A-1 in Appendix A). The BLM provides a response to each theme in Table A-1. A table listing all comments that these themes address is included as Table A-2 in Appendix A.

Responses to other substantive comments, briefly summarized above in Sections 3.2, 3.3, and 3.4, are provided in Tables A-3a through A-3ll in Appendix A.

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U.S. Department of the Interior, U.S. Department of Agriculture, U.S. Department of Transportation, U.S. Department of Energy, U.S. Environmental Protection Agency, White House Council on Environmental Quality, Advisory Council on Historic Preservation, and Tennessee Valley Authority. 2021. *Memorandum Of Understanding Regarding Interagency Coordination And Collaboration For The Protection Of Indigenous Sacred Sites*. Available at: https://www.doi.gov/sites/doi.gov/files/mou-interagency-coordination-and-collaboration-for-the-protection-of-indigenous-sacred-sites-11-16-2021.pdf. Accessed June 22, 2023.

APPENDIX A

Substantive Comments and Responses

INTRODUCTION

The Bureau of Land Management (BLM) provides responses to substantive comments in Tables A-1 and A-3; these responses are organized by the comment categories described in Section 2.2 of the *Summary of Public Comments on the Draft Environmental Impact Statement* (comment summary report) and summarized in Section 3 of the comment summary report. Comment categories are intended to describe the main topic or resource that is discussed in the comment. As described in the Agency and Public Involvement section in Appendix 10 of the Lava Ridge Wind Project (project) environmental impact statement (EIS), the BLM revised the EIS in response to public comments. Following preparation of the responses provided below in Tables A-1 and A-3, the BLM continued revising the final EIS; it is possible not all of the final EIS revisions are comprehensively reflected in Tables A-1 and A-3.

As stated in Section 3.2.13 of the comment summary report, commentors submitted numerous comments on the draft EIS regarding Minidoka War Relocation Center (WRC) and Minidoka National Historic Site (NHS), and many of the comments included personal accounts and related concerns from descendants of former incarcerees, or former incarcerees themselves (see Section 3.2.13.1 of the comment summary report). The BLM respectfully acknowledges the additional detail regarding Minidoka WRC and personal experiences related to this important site, and records the information provided for the project. In an effort to most thoughtfully and respectfully respond to the magnitude of comments containing similar statements, concerns, or concepts, and synthesize this information for ease of commentor and public reference, the BLM has compiled these recurring themes in Table A-1. The BLM provides a response to each theme in Table A-1. Table A-2 lists all comments categorized as opposing the project because of the Minidoka WRC and Minidoka NHS.

Unless provided at the end of each response to comment (in Tables A-1 and Table A-3), literature cited in the responses to comments can be found in EIS Appendix 3 (Issues Analyzed in Brief), EIS Appendix 4 (Mitigation), or EIS Appendix 10 (EIS Literature Cited). Abbreviations used in this appendix are listed and defined in the EIS Contents section.

Minidoka War Relocation Center and Minidoka National Historic Site

Table A-1. Recurring Themes and Responses for Comments Opposing the Project Because of Minidoka War Relocation Center and Minidoka National Historic Site

Comment Theme	Comment Example / Comment ID	Response to Comment Theme
Why site the Project adjacent to the Minidoka NHS or within the Minidoka WRC?	"So why is this being considered near the Minidoka National Historic site and on Shoshone Bannock ancestral lands?" (Comment 1395-1) "It's just not right to choose that location." (Comment 5625-10) "It is disconcerting that this site has been selected to place a 400 wind turbine energy farm with the knowledge that a National Historic Site was already in place." (Comment 6906-1) "[T]he site at Minidoka is NOT the place for a wind farm." (Comment 9325-3) "If it's inappropriate to choose Arlington National Cemetery, the 9/11 Memorial, the FDR Racist Library or the Holocaust Museum as a site to erect wind or solar farms, so is it to desecrate the Minidoka National Historic Site in this manner. It would be an insensitive display of governmental apathy if the Lava Ridge project would be allowed to go forward." (Comment 9408-1) "Though I recognize the importance of expanding renewable energy sources like wind farms, I'm also concerned that the same government that put my ancestors in concentration camps, is now seeking to erase that history by selecting this particular space." (Comment 10436-1) "Why would the BLM permit a monstrous wind farm to pollute the sky and disrupt the quietude so near to this special place to those of us of Japanese descent who worked to bring life to this land?" (Comment 12261-1) (See also comments 3644-1, 7299-1, 7355-1, 8825-1, 9033-1, 9129-1, 9219-1, 9371-1, 9509-1, 9598-1, 9657-3, 10434-1, 10435-1, 10503-1, 11306-1, 12195-2)	The purpose and need for the BLM's action is to respond to the ROW application consistent with the requirements of FLPMA, including the requirement to manage public lands for multiple use and sustained yield. The project is proposed on BLM public lands. Although the project would be adjacent to Minidoka NHS, it is consistent with the applicable land use plan (BLM 1986, as amended). FLPMA authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V), as stated in the Purpose and Need section of the EIS. MVE has applied for a ROW on BLM public lands where the BLM's FLPMA requirements and authority apply. Under the regulations implementing Title V, the BLM's objective in reviewing applications is to grant ROWs consistent with the direction in 43 CFR 2801.2. However, the BLM retains broad discretion in determining whether to approve, approve with modifications, or deny ROW applications. Here, the BLM is reviewing the application together with MVE's POD (MVE 2023) and evaluating the potential impacts of the project consistent with applicable federal laws and requirements, including NEPA (pursuant to which the EIS was prepared) and the NHPA (under which the Section 106 process is completed); see also EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies). The BLM has not yet decided and would decide in a project ROD whether to approve, approve with modifications, or deny the application. The BLM has analyzed a reasonable range of action alternatives in the EIS for developing the project that consider various siting or layouts from which the BLM has arrived at its Preferred Alternative in the final EIS. The BLM has also considered a No Action alternative. The analyses of alternatives throughout the EIS include assessments of the cumulative impacts of the project in relation to other reasonably foreseeable actions in the analysis areas evaluated, including other proposed wind energy developments. The BLM has included and provided opportunities for public input on the project since providing notice in the *Federal Register* (BLM 2021) and has since provided specific outreach to Japanese American communities. BLM. 2021. Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Lava Ridge Wind Project in Jerome, Lincoln, and Minidoka Counties, Idaho. August 20, 2021. *Federal Register* 86(159):46867–46870.
Choose the No Action alternative and/or do not go forward with the Project, either as proposed or at all.	"Please do not allow the wind farm." (Comment 3750-1) "We oppose the Lava Ridge Wind Energy Project as it will disrupt an important historical U.S. site that must be preserved" and "We respectfully ask that the BLM choose Alternative A, the No Action alternative." (Comment 6380-1) "The Lava Ridge Wind Project is environmental injustice after we have experienced social and racial injustice. Only the NO ACTION alternative is acceptable and the right thing to do." (Comment 6870-1) "To locate the huge wind farm near the Minidoka Historical Site is another shameful action against all Japanese-American citizens in particular against survivors and families of Minidoka. This site is not just a museum. It is the place where my lifelong friend was born; it is where his grandmother committed suicide overcome by depression; it is where so many innocent children, elders, adults, all prisoners/internees fought anger, injustice, undeserved shame, and depression caused by loss of freedom, homes, businesses, livelihood...normal lives. BLM, leave the site at peace. A wind farm nearby will change the sacredness of the area. With the vastness of the high desert regions, please consider alternative sites." (Comment 9219-1) "Let's not let the Minidoka historical site be denigrated or diminished in importance by a wind farm. Let the site remain unchanged as is as a stark and harsh reminder of the injustices imposed by our government against innocent people." (Comment 10480-1)	The No Action alternative for the project is Alternative A in the EIS. The BLM is considering a no action alternative for the project by which it compares the potential impacts of the action alternative analyses in the EIS. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA (see EIS Appendix 8) is signed and a project ROD is released. The BLM decision on the project will be stated in the ROD.

Comment Theme	Comment Example / Comment ID	Response to Comment Theme
	"The no build option is the only option. Mitigations cannot address the harm that has, is, and will be dispensed from this project." (Comment 10494-2) "I am very much in favor of wind turbines as a better method of producing power and reducing greenhouse gases, but not at the cost of our historic heritage and memorials. Please find another location for these turbines, one that does not impact the Minidoka memorial." (Comment 10497-1) "I support Alternative A-No Action Alternative because it is the only alternative that protects the integrity of the fundamental resource values associated with the Minidoka National Historic Site and its historic footprint. This includes the site's environmental setting, historic and cultural values, and scenic resources and viewshed, including its immersive setting which allows camp survivors and descendants to better understand and connect to the lives of the people incarcerated at Minidoka and the hardships they endured." (Comment 11315-5) "In conclusion, while we support renewable energy and wind power, we feel strongly that any option other than Alternative A-No Action will fail to protect the integrity of the Minidoka National Historic Site. More importantly, the survivors of the incarceration, their families and descendants, and all Americans deserve to have this historic land preserved for learning and repair of spirit." (Comment 11384-1) "The proposed alternatives, other than Alternative A - No Action, fail to sufficiently protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience." (Comment 11572-1) (See also comments 5-1, 1052-1, 5322-1, 8626-16, 8665-1, 8825-1, 8868-1, 9080-14, 9080-60, 9082-1, 9129-1, 9154-1, 9237-1, 9285-1, 9325-3, 9371-1, 9401-1, 9408-1, 9483-1, 9523-1, 9598-1, 9657-3, 9908-1, 10424-1, 10434-1, 10435-1, 10436-1, 10457-1, 10475-1, 10481-1, 10483-1, 10485-1, 10486-1, 10491-1, 10503-1, 10523-1, 10566-1, 11199-2, 11218-1, 11235-1, 11236-1, 11241-1, 11242-1, 11251-1, 11253-1, 11257-1, 11255-1, 11248-1, 11325-1, 11382-1, 11383-1, 11593-1, 12981-1, and other general opposition comments)	
Construction at Minidoka	"Minidoka War Relocation Center. To build in and around this historic landmark would be an affront to our local Japanese ancestry population and other families now relocated from the area." (Comment 5896-3) "I would like to express my strong opposition to the Lava Ridge Wind Project being considered on the historic footprint of the former Minidoka War Relocation Center in southern Idaho." (Comment 10499-1 "My understanding is that the Lava Ridge project would complete[ly] do away with the memorial center that has since been built at the site of the former Minidoka camp." (Comment 10523-1) (See also Comment 11800-1)	At no point would Minidoka NHS be within the project construction area, regardless of alternative. The BLM's Preferred Alternative would further exclude wind turbine development from the greater Minidoka WRC area. Although lessened by turbine setback from Minidoka NHS, visual impacts would remain under any action alternative, including—as presented in the EIS—those that could affect the experience and sense of place; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). Impacts would be mitigated, as stated in EIS Section 3.5; although, this mitigation would not remove the impacts that remain after all measures to avoid and minimize impacts are applied. Mitigation efforts for the remaining impacts are designed to retain and preserve resource values in alternate ways or to return value through other means, such as retaining documentation of the impacted resource for future knowledge and interpreting and educating on historic properties and area history such as at Minidoka NHS. One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and the surrounding Minidoka WRC and enhance awareness of its history and the history of the Japanese American community.
Designating Minidoka as an Area of Critical Environmental Concern (ACEC)	"[I]t is vitally important that BLM engage in the process to establish the Minidoka National Historic Site as an Area of Critical Environmental Concern due to the special cultural value that the Minidoka holds for the Japanese American community." (Comment 11577-1) "Preserving Minidoka as sacred ground by beginning the ACEC process is critical to help advance racial justice, healing and equity." (Comment 11622-10) "I encourage BLM to adopt the No Action Alternative and begin a public planning process for the ACEC. I look forward to working with the BLM to protect Minidokas sacred values for current and future generations." (Comment 11551-4) "I do support the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC) to protect Minidoka NHS's viewshed, along with other cultural sites, recreational access, migration corridors, wildlife, pollinators, and other values." (Comment 11774-1) (See also Comments 11381-1, 12159-3, 12046-1, 12528-1)	FLPMA requires the BLM to "give priority to the designation and protection of areas of critical environmental concern [ACEC]" in the development and revision of land use plans (43 USC 1712(c)(3)). However, because the BLM is not currently conducting a land use plan amendment, an ACEC cannot be designated through this final EIS. The BLM received a proposal for the "Greater Minidoka" ACEC from Friends of Minidoka. In accordance with the BLM ACEC Manual (BLM 1988), the BLM has conducted preliminary evaluations of two potential ACECs: the proposed Greater Minidoka area and also the Minidoka WRC boundary. See EIS Appendix 13 for these preliminary evaluations. The BLM preliminarily evaluated these two areas for relevance and importance criteria required for ACEC designation (BLM 1988) and to identify whether interim management is warranted to protect values contributing to the relevance and importance criteria. A full evaluation of a proposed ACEC is outside the scope of the project's NEPA process, the purpose and need of which is to respond to MVE's application (EIS Section 1.2). Nevertheless, and notwithstanding the fact that the Greater Minidoka and Minidoka WRC areas are not currently designated as ACECs, the final EIS analysis preliminarily discloses impacts to resources that are described in the Friends of Minidoka ACEC proposal, such as visual resources, cultural resources, and natural resources, as reflected in EIS Appendix 13. Analysis of impacts to the potential ACEC for Minidoka WRC and the BLM's interim management for this area have been added to EIS Section 3.8 (Land Use and Realty).
Evaluating Minidoka as a Traditional Cultural Property or Place (TCP)	"In December 2022, Algonquin Consultants, Inc. completed a TCP study titled 'A Landscape of Isolation: A Traditional Cultural Property Study of the Minidoka Concentration Camp and its Viewsheds' that was submitted to BLM on behalf of the Friends of Minidoka. Whereas Minidoka WRC comprises approximately 33,000 acres of the Project area, the TCP proposal described in the study would be considerably larger than the just the footprint of the WRC" and "BLM should revise its description of the proposed TCP in the DEIS so it accurately reflects the actual size of the TCP proposal as submitted." (Comment 9080-14) "We support the findings in the Minidoka Traditional Cultural Property (TCP) Report that the TCP is "… significant because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." (Comment #11622-11) "We encourage the BLM to consider the impacts of the Lava Ridge project on the Minidoka Traditional Cultural Property (TCP), which has connections to Japanese Alaskan/Alaska Native families wrongfully incarcerated at Minidoka. The Minidoka TCP is connected to the cultural practices or beliefs of the living Japanese Alaskan community. It is rooted in our community's history and important in maintaining our continuing cultural identity. We agree with the TCP Report's findings Minidoka's 'viewshed is an integral part of the visitor experience. Therefore, significant changes to this expansive, largely unobstructed viewshed would have negative consequences and adverse impacts to the integrity of the TCP.'" (Comment 11661-5)	The Idaho SHPO received a draft TCP report for a proposed Minidoka TCP from Friends of Minidoka and provided its response on February 20, 2023. The SHPO has concurred with the recommended finding that there is an eligible TCP associated with the site that is significant under NRHP Criterion A. However, SHPO's comments indicate that more information would be needed to support significance under Criteria B and D and that SHPO did not agree with the proposed boundary as defined in the study. A copy of this draft TCP report was separately provided to the BLM by Friends of Minidoka on January 3, 2023, and the BLM received a copy of the February 20, 2023, SHPO response letter. For reference, the draft EIS was finalized in early December 2022, before Friends of Minidoka's draft TCP report was received. The draft EIS was then released for public comments on January 17, 2023. Subsequently, on December 15, 2023, Friends of Minidoka had prepared and then provided to the BLM an addendum to their proposed TCP boundary, which reemphasized a Minidoka TCP boundary proposal encompassing large areas beyond Minidoka WRC, with which SHPO was in disagreement. Therefore, because there has yet to be a defined TCP boundary, the BLM analyzes impacts to the current historic property boundary (Minidoka NHS) in the final EIS, and in that analysis, the BLM continues to consider potential impacts to Minidoka WRC and to the setting of Minidoka NHS as it may extend to the Minidoka WRC and the surrounding area beyond. Section 106 consultation will also include the BLM identifying adequate avoidance, minimization, and mitigation measures for adversely affected historic properties, including Minidoka NHS, pursuant to the PA for the project (see EIS Appendix 8). The PA preparation process, including development of appropriate mitigation measures, is ongoing.

Comment Theme	Comment Example / Comment ID	Response to Comment Theme
	(See also Comments 9080-13, 9080-43, 11546-5, 11672-4, 13006-1 (see in Table A-3g, Cultural Resources and Native American Concerns).)	
Minidoka as a Site of Conscience	“Because the site commemorates the more than 9,000 Japanese Americans who were imprisoned at the Minidoka War Relocation Center (WRC) during the Second World War, Minidoka NHS is recognized as an International Site of Conscience. However, despite the historical significance of the site, we are very concerned that BLM has proposed authorizing the development of a massive wind farm within the footprint of the WRC and immediately adjacent to Minidoka NHS.” (Comment 9080-2) “I consider this a site of conscience. This is a physical reminder of what our country did when people let fear and prejudice guide their decisions rather than the rule of law. Our civil rights were grossly violated and we must never forget that our government policies ruined people's lives and cost millions of dollars because of racism." (Comment 11305-1) “It goes without saying that even today, in 2023, we continue to see racially motivated attacks and provocations. Our nation has become polarized; it is unfathomable that racially motivated harassment and attacks have become normalized. Even with the recent COVID pandemic and the associated violence against Asian Americans, we as a nation continue to face racial challenges. That is why it is critically important to preserve monuments such as Minidoka as an International Site of Conscience, and continue to provide education and visibility on the unconstitutional removal of so many Japanese Americans from their homes and uprooting their lives. The proposal by the DEIS to use land surrounding Minidoka for wind farms shows a total lack of respect for this significant landmark.” (Comment 11337-1) “On behalf of the Japanese American Museum of Oregon, we write in support of Alternative A- No action. The Minidoka National Historic Site is a unique site for education, memory, and healing. The other Alternatives allow an incursion into the viewshed that significantly disrupts the experience of this site of conscience.” (Comment 11384-1) “The proposed alternatives, other than Alternative A - No Action, fail to sufficiently protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience.” (Comment 11572-1) “We must also remind the BLM how important this site of conscience is to ALL American people. In order for reckoning and healing to occur for the United States as a whole, all Americans must know about the mistakes made by our country and the courage it took to offer apology, reparations, designate parks and memorials, and make significant funding investments to preserve and interpret Minidoka and other sites. This is the sign of a great nation. Minidoka and the important lesson it shares must not be impeded.” (Comment 11622-5) “This is a site of "conscience," not a tourist destination.” (Comment 12950-1) (See also Comments 9657-1 and F1-1)	The BLM recognizes Minidoka NHS as a site of conscience, moral reflection, and community healing. Minidoka NHS is an International Site of Conscience, as noted in EIS Section 3.5 (Cultural Resources). Subsection 3.6.1.1.2 in EIS Appendix 9 provides information on Minidoka NHS as a site of conscience under the Japanese American and Minidoka-Connected Communities heading. Minidoka NHS is recognized as a member of the International Coalition of Sites of Conscience, which defines a site of conscience as “a place of memory – such as a historic site, place-based museum or memorial – that prevents this erasure from happening, to ensure a more just and humane future. Not only do sites of conscience provide safe spaces to remember and preserve even the most traumatic memories, but they enable their visitors to make connections between the past and related contemporary human rights issues” (International Coalition of Sites of Conscience 2022b). The BLM considered this value in the analysis of impacts. In particular, values of Minidoka NHS as a site of conscience and related analysis of impacts are expressed in the assessment of the Minidoka National Historic Site Interpretive Purpose in Section 3.19. The interpretive themes considered for Minidoka NHS at Section 3.19.1 (Affected Environment) and impacts to the Minidoka NHS interpretive purpose at Section 3.19.2 (Impacts) encompass the values of Minidoka NHS as a site of conscience. Mitigation is addressed at Section 3.19.4 (Compensatory Mitigation) and in the Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site section in EIS Appendix 4.
Consideration of presidential Executive Orders and commitments to Environmental Justice	“The DEIS: Does not reflect nor address cultural competency as mandated in President Biden's Executive Order on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders.” (Comment 7358-1) “[D]efenders of Minidoka are in a position of having to justify the cultural importance of a site where Americans were unlawfully imprisoned, with this importance being trivialized as for tourists. This is not acceptable, and is not in keeping with President Bidens recent EO on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders.” (Comment 9119-1) “President Biden signed an executive order that addresses equity for Asian Americans and how this site is treated now is an excellent example of applying those pledges with deeds.” (Comment 9371-1) “In two recent executive orders, President Biden pledged to ‘deliver equity and environmental justice,’ and ‘advance racial equity and support for underserved communities.’” (Comment 11520-1) “[T]he Lava Ridge Windmill project should NOT be approved. It will significantly impact a site of historical significance for Americans. It goes against our own national mandate of Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders.” (Comment 12559-2) (See also Comments 3749-1, 7632-1, 11618-5, 12859-8, 12877-2)	EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) includes EO 14031 on *Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders*. Impacts related to the survivors and descendants of those incarcerated at Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). The EIS has been revised to correctly represent the Japanese American community and Japanese or Alaska Natives. The BLM apologizes for indicating in any manner that the Japanese American communities and Native Americans are within the sensitive viewer group of “tourists and recreationists,” and the EIS is revised to not indicate or imply this. Because of the sensitive character of resources or landscape features assessed in the EIS from certain KOPs, and their strong connections to these, the BLM understands and respects that the Japanese American communities or Native Americans or Alaska Natives should not be referred to as “tourists” in any manner in relation. For consistency with the Minidoka NHS Foundation Document (NPS 2016), the terms “visitors and survivors” were used to characterize Japanese American community members within the Environmental Justice and Cultural Resource sections of the draft EIS (EIS Sections 3.5 and 3.6.1). In EIS revisions, the group formerly referred to under Visual Resources (EIS Section 3.16) as "tourists and recreationists" has been replaced with “visitors” and as "survivors and descendants of the incarcerated," or similar, within the Environmental Justice Communities and Cultural Resource sections of the EIS.
Adequacy of BLM review of impacts and protections at Minidoka in the EIS and under the law	“The National Environmental Policy Act (NEPA) requires a full appraisal of all historical, cultural and religious impacts of this industrial siting decision. There are many negative ones. I do not see them all fully evaluated in the documents. Just one component is the extreme size and height of the MVE's machines -- their mass and sightline appearance is significant, even when viewed at four or five miles distance.” (Comment 4801-1) “If BLM had instituted an effective ‘preservation program to identify, evaluate, nominate, and protect historic properties that are eligible for the National Register' as required un Section 110(a)(2), BLM would have known the WRC (not just the NHS) is potentially historically significant; and proactively determined whether it is eligible for listing on the NRHP. Depending upon that determination, BLM could or should have taken appropriate steps to manage and protect the WRC from the impacts of major development (e.g., through setbacks or exclusions zones) well before MVE submitted its current Project proposal. In our view, BLM’s failure to proactively address its Section 110 responsibilities is the root cause for the current situation.” (Comment 9080- “BLM has not complied with FLPMA’s requirement to inventory resources on public lands. Section 201 of FLPMA requires BLM to ‘maintain on a continuing basis an inventory of all public lands and their resource and other values (including but not limited to outdoor recreation and scenic values)’” (See also Comments 7355-1, 11672-1, 12982-19)	The final EIS analyzes the impacts of the project and the alternatives on the known historic and cultural properties. The current EIS and Section 106 review and analysis of the project represent steps that the BLM is taking under applicable laws (such as NEPA and NHPA) to protect the historic properties associated with Minidoka WRC and Minidoka NHS. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, FLPMA, and other laws, regulations, and federal requirements in advance of the proposed project decision. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA, completing the Section 106 process in consultation with consulting parties. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA (see EIS Appendix 8) is signed and a project ROD is released. The BLM decision on the project will be stated in the ROD.

Comment Theme	Comment Example / Comment ID	Response to Comment Theme
BLM engagement of the Japanese American/Alaskan Communities	“Consultation with Alaska Native tribes and organizations on the historic and cultural impacts of the project is essential to complying with the National Historic Preservation Act, Government-to-Government consultation requirements, American Indian Religious Freedom Act, EO 1307 (May 1996, Indian Sacred Sites), Memorandum of Understanding Regarding Indigenous Sacred Sites (2021), and Indigenous Knowledge Guidance (CEQ, November 2022).” (Comment 11315-1) “I was shocked and angered when I found out about the Notice of Intent for the project well after it was posted. It was clear there was not an earnest and authentic effort to engage the Japanese American Minidoka community in the earliest stages of this project. So many people of the Minidoka community had no idea what was happening after the Notice of Intent was posted on 8-20-2021. I was devastated. My family was devastated. Community members were devastated. At least the BLM heard our voices amongst the Southern Idaho community and granted an extension on the comments deadline.” (Comment 11991-2) (See also Comments 7358-1, 10493-1, 12130-4, 12177-1 (see in Table A-3g, Cultural Resources and Native American Concerns), 12398-7)	The BLM’s scoping and consultation efforts are summarized in EIS Appendix 10 (under Consultation and Coordination) and in the scoping report prepared for the project and posted on the BLM’s project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/510). The DOI Office of Collaborative Action and Dispute Resolution further conducted outreach efforts to the Japanese American communities in Idaho and throughout the United States with connections to Minidoka NHS to identify and consult on community interests and concerns and receive input on the project and produced a summary report on these efforts, as cited in the EIS, and also available on the BLM’s project website. The BLM understands that Alaska Natives, including Alaska Native spouses and mixed Alaska Native and Nikkei children, were among the Nikkei population incarcerated at Minidoka WRC. The NHPA Section 106 consulting parties representing the Minidoka-connected community include those with direct ties to Alaska, such as the Alaska Chapter of the Japanese American Citizens League (JACL) and those from Alaska territory. The BLM is consulting with Native American Tribes with ancestral ties to the project area (see EIS Appendix 10, Section 106 Consultation and Government-to-Government Tribal Consultation). Alaska Native Tribes were not directly among interested parties or stakeholders identified during the initial project scoping or through the NHPA Section 106 consultation process. Please see response to comment 11661-6 regarding the DOI’s trust responsibilities, specific treaties that relate to federally recognized Tribes with ancestral ties to the project area, and regarding the EIS’s full consideration of impacts to resources that may be associated with tribal rights or interests.
Additional detail regarding Minidoka NHS and personal experiences related to this important site	“My mother- and father-in-law are American heroes. They deserve a fitting memorial to commemorate their significant contributions to this country while at the same time suffering illegal incarceration, not to mention continuing racism.” (Comment 11323-1) “My parents, grandparents, and great-grandparents all were incarcerated during World War II in relocation camps - first in Camp Harmony in Puyallup, Washington, and then subsequently moved to Minidoka, Idaho.” (Comment 11337-1) “My parents, sister, and maternal grandparents were incarcerated in Camp Minidoka (Camp) for nearly three years (1942-45). My mother was carrying a fetus during the mass evacuation and lost her daughter in Camp a few days after her birth. I was born a prisoner of War in Minidoka in September 1944.” (Comment 11379-1) “My parents and relatives were incarcerated during World War 2 within these so called 'Relocation Camps'. They were forced to live in these crude concentration camps, behind barbed wire and patrolled by armed sentrys. They endured the dusty hot conditions of Summer, the freezing wintry weather of winter, with food supplies that were poor. communal showers and open toilets. They lost their homes, belongings, businesses and years of their lives. They felt alien, untrusted and un-American. They lost their pride and their sense of purpose.” (Comment 11382-1) “My grandmother, Asano Kanzaki was incarcerated at Minidoka. She had four American born sons who served in the US armed forces. Her oldest son, Akira never returned. Displayed in the window of her barracks were three silver stars and one gold star. Every mother, father, brother, sister at Minidoka had stories of hardships, sacrifices, loses and injustice.” (Comment 11455-1) “I am a fourth generation Japanese American descended from the Sakura family who was incarcerated at the Minidoka concentration camp during World War II - Family #35860, Barracks 17-F-S. This historic site holds deep and profound meaning for myself and my family as a representation of the deep wounds and intergenerational trauma that we live with to this day. It is critical to ensure the stories are not lost, diminished, or overpowered.” (Comment 11510-1) “The Pilgrimages official inception came on the heels of the designation of Minidoka as a National Monument, wherein the site became a place of honor and healing, and not only of oppression and grim memorial. We seek to honor the courage and sacrifices of Japanese American veterans, Gold Star families and resistors, who spoke out against the unjust incarceration. As noted in our scoping letter submitted by survivors and descendants: Annually, many of us are drawn to the Minidoka Pilgrimage to remember, to heal and ally ourselves with those who confront injustice. Desolation creeps into our minds and bodies when we walk along the burning sandy paths. At the ceremonial conclusion of our pilgrimage, we bow our heads to honor the soldiers who made the ultimate sacrifice in defense of our freedoms. We can hear the wind flapping against the American flag as their names are read.” (Comment 11622-1) “During World War II, my grandparents and their families were torn away from their homes, businesses, and lives in Seattle and were imprisoned in Camp Minidoka. They lost everything. After the war, it took them decades to rebuild and restart their lives, but still, three generations later, our family has not healed from the trauma from being violated and forcibly incarcerated against their will by the State.” (Comment 12139-1) “I am yonsei, a fourth generation American with Japanese heritage. Both of my paternal grandparents and their families were incarcerated at Minidoka. My grandpa left Minidoka to fight in the 442nd combat unit and came home with two Purple Hearts, a Bronze Star, a Presidential Unit Citation, a Combat Infantry Recognition Award and an Army Good Conduct Medal.” (Comment 12195-2) “I am a survivor of 2-1/2 years behind barbed wire fences at Minidoka. It’s a solemn place - a reminder of war hysteria, prejudice and hardship suffered by my family because my immigrant grandparents were born in Japan. Leaving home on Bainbridge Island, WA, and transplanted to southern Idaho we faced a desolate land - treeless, dusty and void of all but packed earth and rows of tar papered barracks. Return trips as an adult remind me that this is a unique place in our Country’s history. The quiet, open spaces, dotted by a few restored buildings under open skies, allow for reflection and tears.” (Comment 12261-1) “I am a 90 year old survivor of Minidoka, taken from my home in Juneau, Alaska when I was a child of nine. I remained there with my family without my father who was detained in a justice department camp in Santa Fe, New Mexico until the war ended and I was almost thirteen. Minidoka was a barren, dusty landscape so foreign to me who longed for the beautiful coastal mountains of Alaska. For many of the years following, I wanted to block out the experience of Minidoka from my psyche as it was a painful memory of captivity.” (Comment 12308-1)	The BLM respectfully accepts and appreciates the additional detail pertinent to Minidoka NHS and personal experiences related to this important site, and the BLM records this information for the project with the comments and responses provided in this document. The EIS is updated at Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), 3.16 (Visual Resources), and Section 3.6.1 in EIS Appendix 9 to not solely rely on technical categorizations for analysis but to also further address the unique sensitivities of the Japanese American and Minidoka-connected communities provided in comments and consultation. Within the issues analyzed, the sensitivities, perceptions, and concerns of the Japanese American community are therefore further specifically addressed in the Visual Resources, Cultural Resources, and Environmental Justice Communities sections of the EIS. These revisions included quotes taken directly during the public comment period to show perceptions of impacts in peoples' own words. The Cultural Resources section includes a stand-alone subsection (Section 3.5.2) for Minidoka WRC and Minidoka NHS, which incorporates information from BLM consultation with the Japanese American community, their concerns, and interests. The DOI Office of Collaborative Action and Dispute Resolution conducted outreach efforts specifically to the Japanese American communities connected to Minidoka in order to identify and consult on community interests and concerns and receive input on the project, and they produced a summary report on these efforts, as cited in the EIS (BLM 2022). Although sites of visual importance to one’s home, social, business, and recreation environment are considered in the Visual Resources section of the EIS (Section 3.16), the range of cultural resources that include sacred ground, memorials (including as to veterans and victims of racial prejudice), cemeteries, places of healing and commemoration, TCPs, and sites of religious significance are a consideration of EIS Section 3.5 (Cultural Resources), and impacts to the communities to who these resources are important are addressed in EIS Section 3.6.1 (Environmental Justice Communities).

Comment Theme	Comment Example / Comment ID	Response to Comment Theme
	"My father, Kazuo Murakami, was a true American patriot who was interned at Tule Lake and Minidoka despite being an active member of the Army Air Corp stationed in Arizona. Apparently, he was not East enough to avoid internment, and was reclassified as an enemy alien and sent to internment in his American Aircorp uniform. Until the day he passed away, he expressed how it was one of the saddest days of his life." (Comment 12343-1) "My mother, father, aunts and uncles and grandparents were forcibly removed from Seattle and the Portland area in 1942 and placed in the Minidoka concentration camp. This was an extremely traumatic and life-altering event for our family." (Comment 3749-1) (See also Comments 5382-1, 11325-1, 11593-1, 11772-2, 12193-1, 12241-1, 12299-2, 12323-1, 12369-1, 12538-2, 12559-1, 12671-1, 12859-22, 12877-1)	
Additional analyses of impacts at Minidoka	"The extent and severity of potential adverse effects to the landscape setting of Minidoka NHS (park) and the WRC is particularly concerning. The setting provides critical context to help visitors understand the purpose of the park and the experiences of the Japanese Americans who were unjustly incarcerated there. As described in the 2016 NPS Foundation Document for the site: The purpose of Minidoka NHS is to provide opportunities for public education and interpretation of the exclusion and unjust incarceration of Nikkei Japanese American citizens and legal residents of Japanese ancestry in the United States during World War II. Minidoka NHS protects and collaboratively manages resources related to the Minidoka War Relocation Center in Idaho and the Bainbridge Island Japanese American Exclusion Memorial in Washington State. Also described in the Foundation Document is that [f]undamental resources and values are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to merit primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance. Most notably, Minidoka's environmental setting is identified as a Fundamental Resource and Value because: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. Because the site commemorates the more than 9,000 Japanese Americans who were imprisoned at the Minidoka War Relocation Center (WRC) during the Second World War, Minidoka NHS is recognized as an International Site of Conscience. However, despite the historical significance of the site, we are very concerned that BLM has proposed authorizing the development of a massive wind farm within the footprint of the WRC and immediately adjacent to Minidoka NHS." (Comment 9080-2) (See also Comments 3749-1, 6380-1, 11623-1)	The final EIS includes a new section, Section 3.19 (Minidoka NHS Interpretive Purpose), where impacts identified within the EIS in Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources) are assessed in terms of how these would impact the interpretive purpose of Minidoka NHS under the supporting concepts (Civil and Constitutional Rights, People, Place, and WWII) through the four interpretive themes established through Public Law 110-229: 1. The story of the relocation of Japanese Americans during WWII to the Minidoka WRC and other centers across the United States 2. The living conditions of the relocation centers 3. The work performed by those incarcerated at the relocation centers 4. The contributions of the United States military made by Japanese Americans who had been incarcerated
Consideration of visual and auditory (noise) impacts at Minidoka and to its setting and feeling, including as relates to the Japanese American/Alaskan communities and ability to experience the NHS, and such as would result from project structures and lighting	"Through esoteric legalistic maneuvers Minidoka could be surrounded by windmills and become nothing more than a soulless power station of 400 feet tall windmills. The Minidoka historic site would be lost in the shadows of Lava Ridge turning blades of profit." (Comment 1052-1) "What will this project do to the Minidoka National Monument?" (Comment 11297-6) "The indirect and direct effects of the Project on the historic footprint of the Minidoka Relocation Center and the Minidoka National Historic Site (MNHS) would be pervasive, destructive, and permanent." (Comment 11315-5)	Impacts to the survivors and descendants of those incarcerated at Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). The BLM has found that the project would have long-term visual effects to Minidoka NHS (see EIS Section 3.5 [Cultural Resources]) that would diminish its historic integrity, including as experienced by the Japanese American community and others. The visual impacts at Minidoka NHS are further discussed in EIS Sections 3.5 and 3.16, including daytime turbine visibility and nighttime lighting effects from the project. At no point would Minidoka NHS be within the literal shadows or shadow flicker zone of wind turbine generators from the project (see EIS Section 3.16 [Visual Resources]). Use of an ADLS would minimize the amount of time that red turbine lighting would be lit at night, only turning on when an aircraft is detected by the system. The BLM Preferred Alternative would additionally eliminate project infrastructure from being placed within the greater Minidoka WRC. The BLM has found only the Proposed Action (Alternative B) to have the potential for long-term auditory impacts at Minidoka NHS; the other action alternatives (Alternatives C through E) would not. None of the action alternatives would have long-term atmospheric impacts at Minidoka NHS, such as from dust. See EIS Section 3.5 (Cultural Resources). Action alternatives considered beyond the applicant's Proposed Action (Alternative B) would all work to further set back turbines from Minidoka NHS, and Alternatives C and E and the BLM Preferred Alternative would remove turbines from Minidoka WRC. Under no alternative would turbines surround the Minidoka NHS. Although lessened, visual impacts would remain under any action alternative, including—as presented in the EIS—those that could affect the experience and sense of place; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). However, impacts would be mitigated, as stated in EIS Section 3.5; although, this mitigation would not remove the impacts that remain after all measures to avoid and minimize impacts are applied. The PA for the project (EIS Appendix 8) would further address the resolution of adverse effects to historic properties at Minidoka WRC and Minidoka NHS.
Mitigation of impacts	"My position is that: I support the NO windmill option (Option One) because there is no feasible way to mitigate the impact of the project as well as the fact that this project functions as a 21ST century version of identity hijacking and identity theft." (Comment 1052-1) "Because of their nature and scope, the effects cannot be adequately mitigated at the proposed site." (Comment 11315-5)	Impacts would be mitigated, as stated in EIS Section 3.5; although, this mitigation would not remove the impacts that remain after all measures to avoid and minimize impacts are applied. Mitigation efforts for the remaining impacts are meant to retain and preserve resource values in alternate forms or to return value through other means, such as retaining documentation of the impacted resource for future knowledge and interpreting and educating on historic properties and area history such as at Minidoka. The PA (see EIS Appendix 8) would further be implemented to resolve adverse effects to historic properties, including at Minidoka WRC and Minidoka NHS.

As stated in Section 3.2.13 of the comment summary report, commentors submitted numerous comments on the draft EIS regarding Minidoka WRC and Minidoka NHS, and many of the comments included personal accounts and related concerns from descendants of former incarcerees, or former incarcerees themselves (see Section 3.2.13.1 of the comment summary report). The BLM respectfully acknowledges the additional detail regarding Minidoka WRC and personal experiences related to this important site, and records the information provided for the project. In an effort to most thoughtfully and respectfully respond to the magnitude of comments containing similar statements, concerns, or concepts, and synthesize this information for ease of commentor and public reference, the BLM has compiled these recurring themes in Table A-1. The BLM provides a response to each theme in Table A-1. Table A-2 lists all comments categorized as opposing the project because of the Minidoka WRC and Minidoka NHS.

Table A-2. All Comments Opposing the Project Because of Minidoka War Relocation Center and Minidoka National Historic Site

Comment ID	Sender	Public Comment
2831-1	Ann Shintam	My grandfather was interned at Minidoka. We never thought to go visit as it held forgettable memories. However, as an adult, I believe that the site is a sacred reminder of injustices that have happened and hope to prevent in the future. As Japanese Americans, many in our communities make visits to family and pay respects to family gravestones. Now, we make pilgrimages to historic internment sites, places where our families and communities were displaced. I wish that the respect and solemnity, the barrenness be kept at Minidoka. I believe it will be a powerful and emotional experience, and wind turbines would reduce that solemnity and weight of this site. Thank you.
2832-1	Kelly Campbell	Please listen to the concerns of the Japanese American community about the negative impacts of siting this wind farm near minidoka - affected communities concerns must be addressed to achieve environmental justice.
2833-1	Kamil Khan	Guided by our mission and value statement, the Oregon PSR is here to show solidarity with Japanese-American communities in Oregon. The Minidoka National Historic site is an important marker of the injustices faced by Japanese Americans and any construction contiguous to it, irrespective of project, must have the input of Japanese-American communities and preserve the experience, integrity, and storytelling of the past so history isn't repeated.
2941-1	Brian Ito	It was an American Concentration Camp. It is a cemetery of souls whose lives were forever changed. Where the lives of people like you and me were broken apart by order of the United States Government. Minidoka does not stand alone. Along with 9 other Sites of Shame across America, it bears witness to an arc of Anti Asian racism that started many years earlier. I plead with you of the Bureau of Land Management to let your hearts and minds see Minidoka as we do, a testament to a pain that lives on to today; as well as a symbol of the undying spirit of our fathers and mothers, grandfathers and grandmothers, aunts and uncles who persevered despite adversity to make a better life for all of us, including you. I plead with you to stop the Lava Ridge Wind Farm. In search of cheaper electricity it will desecrate this sacred site of Minidoka.
3232-2	Carol Reitz and Karen Matsumoto; Bainbridge Island Japanese American Community	In keeping with the government's commitment to the Japanese American community, we request that the BLM choose Alternative A, the No Action alternative. Although Alternative E minimizes some impacts to the Minidoka NHS, it does not avoid adverse impacts to important Native American cultural sites, other significant historic and natural areas, local farmers and ranchers, and wildlife. We cannot knowingly support a project that will negatively affect our neighbors and the legacy of our elders. BIJAC would like to voice our strong opposition to the Lava Ridge Wind project, support of the No Action alternative, and request that our comments be included in the public record.
3521-1	Renee Myers	This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding. Dear BLM Lava Ridge Committee, The Lava Ridge Project presents a big problem for a national historic site, I feel they need to keep this area sacred. Also I an familiar with wind turbines being sold off to companies outside the US to run once they get the tax breaks. These are built to help Americans with clean energy, not for outside interests to take them over. We need to be very careful how we approve anything like this, please judge what to do on how you would feel if you were of Asian descent and had family at the camps at one time, and if you still feel this is right for the area make sure it keeps helping Americans and doest go to outside interests through some future deal. BEST WISHES, Renee Myers
3575-3	Sue Page	Disrespecting the Japanese Americans who were imprisoned, died and to those who survived this government because they were Japanese is once again on the verge of being disrespected. 400 - 740ft tall wind turbines casting shadows, disrupting silence by their whooshing sounds and the blinking lights in the night along with tall aircraft warning towers will break the silence of the Minidoka National Historic Site. The government cannot be allowed to disrespect this site. Destroy the wildlife that call this home or the natural monuments created by Mother Nature such as Wilson_Butte_Cave. As stated this historical site cannot be moved but this wind project can. No to building Lava Ridge in any form presented.
3602-5	Sue Page	Minidoka National Historic Site will be disrespected by the looming towers, blinking lights and the constant whooshing sound created.
3622-1	Claudia Taylor Walsworth	To Whom It May Concern: Please find my comments below for the Lava Ridge Windmill project proposed by Magic Valley Energy, LLC. My name is Claudia Walsworth, I am a self-employed archaeologist with my own small proprietorship in Idaho. I meet the Secretary of the Interior's qualifications and have specialized in cultural resource management for over 30+ years. My clients range from the private sector, federal, state, and local governments to non-profit organizations. In the early 1980's, I was an archaeologist for the Shoshone Field Office BLM. During extensive field work, I learned firsthand about the area's valuable, fragile, and irreplaceable cultural resources including those in the project area. My work focuses on projects requiring Section 106 compliance; therefore, I understand what constitutes an adverse effect on historic properties during a proposed action within an Area of Potential Effect (APE) from the standpoint of the Federal and State governments. I also have a good understanding about what constitutes an adverse effect in terms of environmental justice communities such as Japanese Americans and Native Americans with long standing ties to the project area. These groups have identified areas where Traditional Cultural Properties (TCPs) are present under the Section 106 consultation process According to the EIS Volume I Executive Summary, the physical APE measures 84,375 acres in size or 132 square miles that takes in the 9,111 acres or 14 square miles of proposed ground disturbance. I also understand that the non-physical APE measures at a much greater spatial footprint at 2,050,486 acres or 3,204 square miles. There are approximately 5,096 previously recorded cultural resource properties within the non-physical APE. For the physical APE, there are 199 cultural resource properties. A mere17% of the physical APE has been previously surveyed for archaeological and historic sites. The types of sites located in both the physical and non-physical APE are varied and portray a 16,000 year old human landscape. Prehistoric sites in the APE, both physical and non-physical include lithic scatters, tool scatters, campsites, and rock features consisting of cairns, stone circles, alignments, and hunting blinds. In addition, there are sacred geography and cultural landscapes important to Native American stakeholders, including rock shelters, lava tubes, lava blisters, caves, and buttes. Historic resources include trash scatters/dumps, farmsteads, homesteads, houses, buildings, rock habitation structures, campsites, bridges, and linear features. Historic linear features prevalent throughout the study area and APE are railroads, trails/roads, transmission lines, and irrigation-related features such as canals, ditches, and reservoirs that are part of the large Minidoka Project and Reclamation Era agricultural landscape. Currently, there are 13 historic districts in the study area that are listed with the National Register of Historic Places (NRHP): * The Bonneville Power Administration (BPA) Unity Substation Historic District * The BPA Heyburn Substation Historic District * The North Side Pumping Division District * The Shoshone Historic District and Boundary Increase for the Shoshone Historic District

Comment ID	Sender	Public Comment

* Rupert Town Square Historic District and Boundary Increase for the District

* Twin Falls Downtown Historic District

* Twin Falls Original Townsite Historic District

* Twin Falls City Park Historic District

* Twin Falls Historic Warehouse Historic District

* Lava Rock Structures Thematic Group

* Historic Agricultural Resources of Twin Falls County, Idaho 1860-1970 (new NRHP listing since EIS published)

In addition to these historic places there are also several linear features that are part of a larger district or individually eligible for listing in the NRHP:

* The Oregon Trail, North Alternate and the Shoshone Falls to Starrh's Ferry Wagon Road

* The Oregon Short Line/Union Pacific Railroad

* Extensive Reclamation-Era Irrigation networks including the Milner-Gooding Canal, the North Side Canal, and dozens of other interrelated buildings and features such as pump houses, canals and canal roads, drains, ponds, reservoirs, dams, and other water transportation equipment

There are several Traditional Cultural Properties (TCPs) that fall within the study area and most likely many more that have yet to be identified. Although these have not been formally documented with the National Park Service as TCPs, the following properties are acknowledged in the Lava Ridge Wind Project EIS documents that contain areas of cultural, religious, or spiritual importance. These areas may be visible or non-visible and include sacred places or sensitive use areas for plants, wildlife, water, minerals, and other highly revered natural resources.

* Wilson Butte Cave

* The Minidoka National Historic Site/War Relocation Center (Minidoka Site) as Site of Conscience

* The Oregon Trail Ruts at Milner

* Other areas containing artifacts or features with human remains, funerary objects and sacred places important to the Native American community

* Other sacred pilgrimage areas containing cultural landscape features important to the Japanese American community

During all phases of the proposed project, there is the potential for the discovery of thousands more cultural resources or TCPs in the physical and non-physical APE. The impact duration for physical effects of the project on cultural resources and TCPs is permanent because cultural resources are non-renewable resources. The impact duration for non-physical impacts from the project are expected to last 34 years from the start of construction to decommissioning the wind turbines and transmission lines from operation. This is 1/3 of a century that will have lasting adverse visual, audible, and atmospheric effects for the land, people, animals, plants, water, air, and other essential resources.

According to my analysis of the EIS concerning cultural resources and environmental justice groups, I am writing to tell you that my preference to the Lava Ridge proposal is a firm vote for ALTERNATE A NO ACTION.

The reason I am for ALTERNATE A NO ACTION is based on the following reasons:

* Throughout the EIS documents, the Japanese American community, Native Americans with Treaty Rights, and Low Income communities should be regarded as stakeholders, not tourists or recreationists.

* The project under Alternates B-E will have long term, adverse effects to the visual, auditory, and atmospheric conditions at Wilson Butte Cave

* According to the EIS, the Shoshone-Bannock Tribes believe that the presence of the project is severely impactful on TCP's

* According to the EIS, the Northwest Band of the Shoshone Nation state the project will have adverse impacts on wildlife and vegetation, which are spiritually and culturally significant to their community

* The project under Alternates B-E will have long term, adverse effects to the visual, auditory, and atmospheric conditions at the Minidoka Site

* The project under Alternates B-E will diminish the Japanese American Community (Nikkei) a place to remember and reflect the atrocities that occurred at this site to themselves, their families, and friends

* The Minidoka Site and surrounding area is a Site of Conscience. This sacred landscape is important to the Nikkei and is a place of remembrance. Turbines will alter the character of the expansive views of this isolated agrarian landscape and the noise and lighting as well as dust during construction and other necessary operations will diminish the experience of people visiting the site and will negatively affect the property's intrinsic value

* The project presents long term, adverse effects to wildlife habitat and population

* The project presents long term, adverse effects to the Snake River Plain aquifer

* The project presents an eyesore to the pristine beauty of the rolling lava hills and agricultural landscape

* Physical impacts would be permanent. The impacts duration for non-physical visual impacts from project infrastructure is the 34-year life of the project, from the start of construction through decommissioning, and the impact duration for non-physical audible impacts (from turbines and transmission lines) is the 30-year operation phase.

Comment ID	Sender	Public Comment
		Although there is a Programmatic Agreement in place that addresses responsibilities for Section 106 and mitigation plans to minimize the adverse effects of the project on cultural resources and spiritual places of importance to the Nikkei and Native American communities, these proposed efforts may not be enough to maintain and protect the values of these properties. I hope you will consider my comments and join me in voting for ALTERNATE A NO ACTION. Sincerely, Claudia Walsworth
3644-1	Colleen Vadheim	Haven't we done enough to the Japanese Americans? Please honor their sacred ground and look elsewhere to place your wind turbines. Thank you. Margaret Vadheim
3703-2	Julie Erickson Simonds	And, within the proposed Lava Ridge development is the Minidoka National Historic Site. I feel it is so disrespectful to impact this area that has been designated as a memorial to the Japanese-Americans who suffered here.
3725-2	Jerry Ball	The project diminishes my experience of The Minidoka National Site that is also enjoyed by many others because of the giant wind turbines that will be a giant eyesore on the landscape. Reconstruction of the Site is both historically and culturally of a great importance to the Japanese Community. Disturbing the viewscape, soundscape and viewable landscape should be unacceptable.
3750-1	Marylyn Feaver	I was a 7 years old sansei when Japan bombed Pearl Harbor. I was living then on the Big Island of Hawaii and could not fully comprehend how that aggression would change the lives of many Japanese-Americans in the US. However, it was hard to ignore. In Hawaii we called these "concentration camps". Throughout my growing up and formal education years, the experiences of those who were forceably moved to isolated barbed enclaves seemed less disastrous than the genocide occurring in Europe. As I grew older, and moved to SW Georgia during the Civil Rights struggle to help with voter registration, the implications of what happened to Japanese-Americans took on a more personal connection. I could not separate myself or my history from what happened during those years, and vowed that one day I would visit these sites. Having read accounts, I am hoping to try to imagine what it was like for an 8 year old, which I would have been, had I been sent with my nissei parents and my issei grandmother to one of these camps. The sparseness of the geography, the winds blowing and the feeling of isolation, I expect might help me to connect. Being that these are government lands, and I am grateful for the EIS process so ordinary citizens like me can comment, the historical value of a site must include the ambiance. My children also carry European lineages, but my grandchildren have either Japanese or Hawaiian first names. I would wish that these national commemorative places be there as historically accurate experience so they, too, can imagine that this Executive Order was questionable. Monuments as these, like The Little Big Horn Battleground in Montana, are reminders that our uniqueness as a nation is our diversity and willingness to remember when we have strayed from the pledge of one nation ... "with liberty and justice for all". I am grateful that the national government has pledged to restore and recreate lasting monuments for certain of these camps, but in this case, I hope that the experience, not just the site, will be considered. As someone who has changed our lifestyle to conform to more sustainable ways, I support the move toward government support of alternative energy. But, the sense of who we are as a people, are also important, too. Please do not allow the wind farm.
4031-1	No Name Provided	Survivors and descendants of Minidoka incarceration oppose Lava Ridge (magicvalley.com) <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmagicvalley.com%2Fnews%2Flocal%2Fsurvivors-and-descendants-of-minidoka-incarceration-oppose-lava-ridge%2Farticle_b90c4c3e-b47a-11ed-be3d-7b6c6f1f8187.html%3Futm_source%3Dmagicvalley.com%26utm_campaign%3D%252Fnewsletter-templates%252Fnews-alert%26utm_medium%3DPostUp%26lctg%3D5646104%26tn_email_eh1%3D58f7b15e3b93e624e23ae3451d2ff44d181ebfa9&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0ba9be85a98643b9ee5508db18e767db%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638131154374383130%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=PMKAKvZElox73iFp5CurAb6FT7%2BO1G6Z9T4NF0Lb52c%3D&reserved=0> During World War II, President Franklin D. Roosevelt issued Executive Order 9066, allowing the War Relocation Authority to forcibly move 120,000 Americans of Japanese descent from their West Coast homes to inland internment camps. Minidoka National Historic Site, north of Eden, is one such camp, which confined 13,000 Japanese Americans, primarily from Washington, Oregon and Alaska. Karen Hirai Olen was born at the internment camp; her family was released when she was 18 months old. Her father had gotten a job as a farm hand near Curry, so the family stayed in the Magic Valley. Hirai Olen said that, growing up, she never knew exactly what had taken place. It wasn't something her family discussed. My parents never talked about Minidoka, really, she told the Times-News. When my mother's friends would come to visit they all spoke amongst themselves in Japanese. So we knew it wasn't something good, but we had no idea what happened. Many descendants of survivors of the incarceration have said the same thing: It wasn't something that was discussed. The pain was too raw. The forced removal of Japanese Americans from their communities devastated their lives and erased livelihoods. Many lost all their possessions that didn't fit in a suitcase. The effects are still felt in the community, several generations later. I would ask my mom different things and she would just kind of give me non-answers, Hirai Olen said. I really didn't understand what it was all about until we started going on the pilgrimages. The first Minidoka Pilgrimage for survivors and descendants took place in 2003, and have taken place regularly ever since. The pilgrimages have been described as an act of healing, giving survivors and descendants a space to recognize and overcome the wrongs of the past. It was on one such pilgrimage in 2007 that Hirai Olen said she finally heard her mother discuss her experiences of incarceration at Minidoka. It was a tremendous act of healing, she said. When you see 300 or more people at Minidoka, the sense of healing is so strong and the sense of cohesion within our community. We can come together about this 60, 70, 80 years later, I think that's something that needs to be valued. The land was the prison' To many survivors, Minidoka is sacred ground. The nonprofit Friends of Minidoka's mission is to preserve, protect, and educate. Executive Director Robyn Achilles told the Times-News that the group wants to make sure the story of incarceration is recognized and treated in an honorable and somber manner. You can imagine, for the Japanese-American community, incarceration is an incredibly painful and important part of our history, Achilles said. It really defined who we are, sadly, and how we were raised, and what we experienced after incarceration. The Japanese-American community adamantly opposes an application to place up to 400 wind turbines on Bureau of Land Management ground north of the Minidoka Historic Site. When LS Power and Magic Valley Energy applied for a right-of-way permit from the BLM for the sprawling wind farm, many in the Japanese American community felt the progress made in the last 80 years toward acknowledgement of the violations of civil liberties would be a step backwards. When we found out about this proposal, we were shocked, and it was so painful because it felt like another attack on the Japanese-American community, Achilles said. We feel like the proposed project minimizes the trauma, the loss, and the humiliation that was suffered by American citizens based solely on their ancestry. The sense of isolation the incarcerated community experienced was amplified by the remote landscape, with vast, sweeping views, surrounded by emptiness. The possibility of a visual wall of spinning wind turbines interrupting the viewshed would alter that key feature, she said.

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		One of the fundamental values of the park is the remote setting and immersive experience, Achilles said. Eighty years ago there was barbed wire, but so many of the survivors said the reality was they weren't going to escape because the land was so remote and desolate, where would they go? The land was the prison. Alternatives shaped by public comment During the scoping period in 2021, a majority of public comments submitted expressed concern from the Japanese-American community about the impact the wind project would have on Minidoka. The draft Environmental Impact Statement <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Feplanning.blm.gov%2Feplanning-ui%2Fproject%2F2013782%2F510&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0ba9be85a98643b9ee5508db18e767db%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638131154374539358%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=%2FberRef0HJnFtdNayHCnvlCQ3LrpRxFs1kg6oYVUGpM%3D&reserved=0> for the project was released in January and is now in the public comment period, which has been granted a 30-day extension <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmagicvalley.com%2Ftncms%2Fasset%2Feditorial%2Fdbda8dac-b3ad-11ed-b522-8fb3a8c75742&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0ba9be85a98643b9ee5508db18e767db%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638131154374539358%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=fT8LZhp91lDbjAuNX9Xv03lQ3rLaMji%2BG3E%2FTtOEMko%3D&reserved=0> and will close on April 20. Driven by the volume of comments concerned about the impact to Minidoka, the draft EIS evaluated three scaled-back alternatives that would reduce the visual impacts to Minidoka, in addition to evaluating the project as proposed by the applicant. In Alternative B in the draft EIS, the nearest wind turbine would be sited approximately 1.7 miles from the Minidoka National Historic Site's visitor's center. Alternatives C, D and E all have a reduced footprint, with wind turbines sited farther away from the historic site. Alternative D would put the turbines the farthest from the site — less than 6 miles from the visitors center. Under all alternatives, windmills would be visible from the site. Broad community opposition Janet Keegan is on the Friends of Minidoka board, and is active in the Stop Lava Ridge Committee. Keegan, a lifelong resident of the Magic Valley, is not only opposed to the project based on its impact to the historic site, but also because of the likely impacts the project would have on people who hunt game, people who graze cattle and people who farm. I feel like if the government were to approve it in any form, it would be another transgression such as incarceration was, Keegan said. It would take away livelihoods and way of life for the people in the Magic Valley who live and depend on that land. Keegan said she feels good about the ability of a community effort to halt the project. Hundreds of people showed up to two open houses the BLM held for the project in Shoshone and Twin Falls. The amount of community participation is encouraging, Keegan said. I'm totally optimistic, I think that this thing could be squashed, Keegan said. Idaho has enjoyed years and years of just being able to recreate and enjoy our open spaces. And now we're confronted with this threat. And we have to take care of it. We have to face it. To facilitate participation from the Japanese American community, the BLM is hosting open houses in Portland, Oregon, and Mercer Island, Washington. State and national partners like the Japanese American Civil League and the Japanese American Museum of Oregon are helping to spread awareness, and encouraging members of the community who are outside of the Magic Valley to participate. Heather Tiel-Nelson Twin Falls District BLM Public Affairs Specialist
4161-1	Brian Ito	Dear Bureau of Land Management, Minidoka was not a summer camp. It was an American Concentration Camp. It is a cemetery of souls whose lives were forever changed. Where the lives of people like you and me were broken apart by order of the United States Government. Minidoka does not stand alone. Along with 9 other Sites of Shame across America, it bears witness to an arc of Anti Asian racism that started many years earlier. I plead with you of the Bureau of Land Management to let your hearts and minds see Minidoka as we do, a testament to a pain that lives on to today; as well as a symbol of the undying spirit of our fathers and mothers, grandfathers and grandmothers, aunts and uncles who persevered despite adversity to make a better life for all of us, including you. I plead with you to stop the Lava Ridge Wind Farm. In search of cheaper electricity it will desecrate this sacred site of Minidoka. Respectfully yours, Brian Ito
4220-8	Sue Page	They can liter the ground with dead birds around this site and the whole area. These beasts with flashing lights will dishonor those Japanese Americans who were displaced from their homes and treated with disrespect. To belittle this site by placing these beast here is shameful.
5281-1	Dan Handa	Renewable "Green Power" for Southern California, but at what cost? My grandparents, father, uncle and aunt were incarcerated at Minidoka during WWII. So were many, many other Japanese American friends and relatives of mine. I visited Minidoka in June 2016 and while there isn't much left of the camp remaining from the war I was moved by the location, its remoteness, the quiet, and the stark beauty of the dry Idaho countryside. It was not difficult for me to understand why the War Relocation Authority picked this remote windswept location to intern Japanese Americans. Giant wind turbines as a high as a 75 story building which will be visible for tens of miles as well as occupy an tens of square miles? All three affected Idaho counties have voiced their opposition to the project. Wind turbines of this scale and numbering in the hundreds should not be allowed to desecrate Idaho or frankly any other part of our country. My primary concern is the desecration of the Minidoka National Historic Site, however even if the historic site was not there I would still support the Idaho area residents. It is hard for me to fathom how this huge project has progressed as far as it has under the radar. I only recently found out about this project from the local news media in the Seattle area. I believe there are many others like myself who reside outside of Idaho who are not yet aware of this project who would wish to comment in opposition to a project.
5382-1	Wanda Yamagata	My family was not incarcerated in the Minidoka Hunt Camp but were fortunate to have been long time residents of Jerome County and were able to purchase a farm which just happened to be in the future camp area. Many of our family friends were people who decided to remain in this area after the camp closed. It is an affront to those people to have this project built so close to the area that holds so much significance to them and to the remembrance of such an embarrassing time in the history of our country. A time which should not be forgotten.
5625-1	Michael Klein	Just speaking from the heart, as a Seattle local and business owner. I really hope you're able to find a new location that doesn't disrupt the hearts of those who care so much for preserving the old internment camp location. The Japanese are incredibly kind and symbolic people. It's just not right to choose that location.

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5896-3	Mike Tylka	Minidoka War Relocation Center. To build in and around this historic landmark would be an affront to our local Japanese ancestry population and other families now relocated from the area. One of my next door neighbors had immediate family members illegally detained at the camp by the hateful racist democratic party of the time.
5921-1	Claudia Taylor Walsworth	* Throughout the EIS documents, the Japanese American community, Native Americans with Treaty Rights, and Low Income communities should be regarded as stakeholders, not tourists or recreationists. [...] * The project under Alternates B-E will have long term, adverse effects to the visual, auditory, and atmospheric conditions at the Minidoka Site * The project under Alternates B-E will diminish the Japanese American Community (Nikkei) a place to remember and reflect the atrocities that occurred at this site to themselves, their families, and friends * The Minidoka Site and surrounding area is a Site of Conscience. This sacred landscape is important to the Nikkei and is a place of remembrance. Turbines will alter the character of the expansive views of this isolated agrarian landscape and the noise and lighting as well as dust during construction and other necessary operations will diminish the experience of people visiting the site and will negatively affect the property's intrinsic value
6356-5	Gayle Michelucci	WE SHOULD NOT DESIGRATE THE MEMORY OF THE JAPANESE. THAT AREA SHOULD BE REMOVED FROM THE PROJECT, UNLESS SOLAR IS USED AS COVERING GOR THE PUBLIC THAT VISITS.
6380-1	Eileen Miyao, Stanley Miyao	We oppose the Lava Ridge Wind Energy Project as it will disrupt an important historical U.S. site that must be preserved. In 1942, 20,000 residents of Japanese descent living on the west coast were exiled to one of 10 concentration camps located in desolate areas of the US. Minidoka was one of such camps. Most of those exiled to the concentration camps were US citizens. The living conditions were inhumane as families were cramped together in makeshift, tar-papered barracks. Barbed wire fences contained them in the camp. Guard towers were manned with armed soldiers; rifles pointed inwards towards the Japanese prisoners ensuring they did not try to escape. We grew up in California during the 1950-1970's and there was no mention of the incarceration of the Japanese Americans in school curriculum nor did we have classroom discussions on this topic. Our education did cover historical material on the German death camps and black slavery in the US. But Japanese Americans incarcerated in concentration camp in America? It was like it never happened! In early January 2023, President Biden signed a new bill that will help memorialize the history of the U.S. government's incarceration of Japanese Americans during World War II. The legislation would reauthorize funds that help preserve the sites in which tens of thousands of Japanese Americans were detained. The act will not only renew funding for the 2006 Japanese American Confinement Sites Program, but also designate $10 million for grants to understand the "use and abuse of power," and promote awareness around this dark period in American history. of every American," said co- Today, the existence of camps such as Minidoka, in an untouched state, allows Japanese Americans and all visitors (especially those who are unfamiliar with the Japanese American experience during World War II) to see and mentally experience what the Japanese Americans lived through during World War II. We went to one of the few remaining camps and could not believe that our parents, grandparents, aunts, uncles, and cousins had to live there. We had heard their stories about camp life but did not realize how bad it was to have to live there; until we saw it first-hand. We wanted to return to our home after a few hours on the camp site. How could America treat its citizens like that? Unbelievable!! Current Americans need to know what happened here so that history does not repeat itself. Who would believe it today? We need to preserve Minidoka in its current state as a reminder that this happened in the United States in 1942-1945 solely because of "racial prejudice, war hysteria, and a lack of political leadership." And it can happen again to anyone! We oppose the proposed Lava Ridge Wind Energy Project and ask, "How does the addition of wind turbines at Minidoka National Historic Site preserve the site as proposed by the new bill recently signed by President Biden?" The Wind Project will change the entire environment at Minidoka by destroying the peace and tranquility in the area. Visitors will be turned off by the sights and sounds of the turbines and eventually the site will no longer be frequented by visitors, leading to its future closure. How does eliminating one more of the 10 concentration campsites promote awareness about the dark period in American history? We respectfully ask that the BLM choose Alternative A, the No Action alternative.
6403-1	Satsuki Ina	Minidoka War Relocation Authority unconstitutionally held over 13,000 Japanese Americans depriving them of life, liberty, and the pursuit of happiness. It is a site of shame and as such a site that must be preserved for the healing of survivors and for all Americans to learn from the mistakes of those in power who fell victims to racism, wartime hysteria, and the failure of political leadership. Most of us want an environmentally sound alternative form of energy and would support such plans, but NOT ON A CULTURALLY AND HISTORICALLY SIGNIFICANT site. We who go to pilgrimage at Minidoka are not "tourists" and "recreationalists" as stated in the report! We are SURVIVORS AND DESCENDANTS who seek healing and learning by preserving and honoring a site where people can be reminded to never allow such a failure of humanity to occur again.
6830-1	Erika Jennings	Being of Japanese American heritage, with relatives that were incarcerated at what is now the Minidoka National Historical site, there is a large potential impact on how I am able to experience the area if this proposed development is allowed. Visiting the site holds a very emotional connection for me and my family. I visited with my husband and daughters several years ago and we were all shocked and unsettled by the barren, exposed and desolate feeling of being in a place with little vegetation and civilization surrounding it. Trying to imagine the desolation and isolation that my grandma and grandpa, aunts and uncles must have felt as we looked across dusty land with nothing as a landmark or comfort of the Willamette Valley that they had been forced from, we were overcome by emotion. The eerie silence and stillness in the air were both oppressive and haunting. The addition of transmission lines, turbines, battery stations and other developments that are included in this proposal will vastly change the feeling of the historical site if they are visible, audible or felt leading up to and at the site itself. Those developments would alter the stillness and exposure that overshadow that historical site, which is integral to the experience and learning that happen there. With all the division and hate within our society today, we run the risk of repeating mistakes like incarcerating US citizens that were never shown to be a national security risk, if we don't preserve the character and integrity of historical sites like Minidoka. Please don't make the mistake of denigrating a historical site that has so much potential to impact how we behave as members of the human race.
6844-1	Lenore Chinn	Please protect Minidoka National Historic Site from a massive wind farm project that would only serve to benefit corporate entities and desecrate a sacred site where more than 13,000 Japanese Americans were unjustly imprisoned at Minidoka during WWII. This area has tremendous cultural and historic significance which must be preserved as a reminder that unlawful detentions motivated by wartime hysteria not be repeated. I urge you to take a leadership role in recognizing this legacy in the interests of advancing environmental justice. A sustainable, greener future must center impacted communities, and not further harm them. Minidoka must be protected as a place for healing and learning for future generations of all Americans.
6870-1	Name Not Provided	As a descendant of Japanese American survivors from Minidoka, the Lava Ridge Wind Project makes me seethe with disgust and feel heartbroken. How can the government betray our community by first apologizing for the injustice of the incarceration, then designating Minidoka National Historic Site to learn about the injustice, and then commit yet another injustice against the Japanese American community. The Lava Ridge Wind Project is environmental injustice after we have experienced social and racial injustice. Only the NO ACTION alternative is acceptable and the right thing to do. Even though the BLM is trying to "minimize" the impacts to Minidoka with Alternatives C and E, both alternatives have the negative impacts of hurting our community and further tarnishing the reputation of the Department of the Interior. I am shocked and appalled that Secretary Haaland and National Park Service Director Sams would allow the project to move forward. It is unconscionable for indigenous leaders who espouse caring about equity and environmental justice to support this project. Any of the action alternatives for the Lava Ridge Wind Project would desecrate a place that holds so much historical trauma to the Japanese American community. We are not tourists and recreationists; we are survivors and descendants still healing from the injustice inflicted by the government and Department of Interior on our community. No mitigation is acceptable to me. If the Lava Ridge Wind Project is developed and the wind turbines are spinning across the Minidoka skyline, I will forever feel betrayed. I doubt if I could ever go there again. The Minidoka Pilgrimage will be severely negatively impacted if people like me no longer feel a connection to Minidoka as a place of healing, and rather think of it as a site of betrayal. No money or project could make up for this impairment and unacceptable impact to Minidoka, a place that

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		scarred my family and community during World War II and now is a place for education, healing, commemoration, and upholding the dignity of the nation. Who ever makes this final decision should know that any alternative, except the no action, will be a major blow to the Japanese American community, and a huge step back in the progress of our nation in healing historical wounds and righting wrongs.
6874-1	Name Not Provided, Robert Barr	I feel a part of history as important as this must not be disturbed. Too often these days misinformation is provided to us and it's places like this where you can come and share tangible evidence of our horrible past. We must know that we too are not above committing acts of systemic racism for the benefit of security. We must be ever vigilant to hold ourselves and our government responsible. This Hallowed ground must remain a symbol of the sacrifice forced upon our own that should never have occurred. So many of them had sons who still fought in the European theater out of honor, for a country who showed them no respect. Therefore we must now and forever respect this place.
6876-4	Jonathan Jarvis	Having worked closely with the Japanese American community for the preservation, interpretation and restoration of these sites, I can attest to their value and importance as places for healing and learning. American citizens, many born in this country, were rounded up and forced into these lonely landscapes for no other reason than their ethnicity. Obviously, this was an act of the federal government, enforcing President Franklin D. Roosevelt's Executive Order 9066. It is through the preservation of these sites that we as a nation can recognize and hopefully prevent actions that violate basic constitutional rights, even during times of war.
6876-5	Jonathan Jarvis	Preserving sites of conscience alongside sites of commemoration is a uniquely American practice, valuing these hallowed grounds for the messages they deliver to successive generations that we are willing to learn from our mistakes. Once again, it is the federal government who can decide on the fate of these historic sites. When one travels to Minidoka, Manzanar, Tule Lake or other confinement sites, the desolate isolation is evident and essential to the experience. Ironically, the War Relocation Authority which was established to manage the ten confinement camps was an agency of the Department of the Interior under the thoughtful stewardship of Sec. Harold Ickes. Today, the BLM and the NPS, both agencies of the same DOI, wrestle with this legacy and the conflict created by energy projects like Lava Ridge.
6879-1	Katherine Laubscher	The greatest experience of my life to date has been going on a pilgrimage to a Japanese-American incarceration site where my great-aunt was held. Part of what made this experience so special was the way the landscape had been preserved. Each incarceration site was, by definition, selected because it was situated on land where no one else wanted to settle (with the exception of the Colorado River and Gila River camps, which were established against the will of the American Indians who by rights possessed the land). So each "camp" is characterized by its own version of desolation and wide open space. That vast emptiness is a core characteristic of these camps; the scale and openness of the land is the underlying theme that connects the camps across climate and state. The simulations provided by the BLM are all too convincing: the proposed turbines would irrevocably disrupt and ruin the quality and the sanctity of the space that Minidoka holds for thousands of Americans. The simulations show a nightmarish future prospect, an alternate reality that I sincerely pray never comes to pass. A visit to Minidoka is more akin to a sacred pilgrimage than a tourist visit. It is a living site that still holds memories for those who are here to recall them, and one that holds real, visceral energy for anyone who has a connection to the camps. Please know that the Shinto religion also places a great importance on the sanctity that a certain location can hold. Minidoka is one of those locations. The grounds of Minidoka played host to the fullest of human experience, from suffering, to perseverance, to even great art in the face of oppression, as in the case of the famous woodworker and artist George Nakashima. These camps must be preserved as the historic sites they are. Enclosing them with massive structures and disrupting their skylines threatens to reduce them to soulless markers. The incarceration campsites embody the Japanese-American incarceration on a spiritual and literal level. Damaging them damages our collective history, and threatens our future. I believe this project would only serve to make it more difficult to preserve the Minidoka site the way it ought to be preserved, both on a historical and humanitarian level. The Lava Ridge project would be detrimental to countless generations to come and cause irreparable damage to the Minidoka historic site.
6882-1	Will (No Last Name Provided)	It is shameful and racist to continue with the Lava Ridge Wind Project. How dare the Bureau of Land Management auction off the remaining shreds of integrity to LS Power so blatantly. Completely dismissing the concerns of Japanese American concentration camp survivors as "tourists" is cruel and heartless.
6906-1	Karen Lucas; Twin Cities Japanese American Citizens League	It is disconcerting that this site has been selected to place a 400 wind turbine energy farm with the knowledge that a National Historic Site was already in place. In the large state of Idaho, there are other sites without National Historic Site designation. The message of discounting and disrespect was apparent from the start of planning. It was disregard and outright hostility which created the site back in a supposedly less enlightened time 80 years ago, a violation against Americans of Japanese ancestry deprived of due process. After the concentration camp was closed in 1945, property was open to homesteading but restricted to whites. The lessons of a threatened constitution and civil liberties are fundamental to preserving a democracy under constant siege. There is no better visceral impact than the physical experience of that offense, the immersion in the stark, barren, forsaken reality of the landscape which would now be altered by the intrusion of wind turbines.
6906-3	Karen Lucas; Twin Cities Japanese American Citizens League	As a third generation Japanese American, I personally feel the denigration this project casts on my community. Both of my parents' families were imprisoned for 3 years on a desert in Arizona after having lost everything due to their forced removal from California farms. My father at the time was a US Army soldier who ended up serving with the Military Intelligence Service in the South Pacific as well as in Occupied Japan. He retired a major after a 20 year US Army career and prided himself on being a patriot his entire life. Japanese Americans are all too familiar with this process. This National Historic Site which is managed by the National Park Service, with its profound message, is currently underfunded relative to similar National Historic Sites established around the same time with no more compelling interests than this one. Perhaps it is time for the tone to be reset to one of equal consideration, fairness and justice for all Americans, and curbing the one sided powerful and monied interests over the people who suffer the consequences.
7299-1	Virginia Hand	I learned of this proposed development from the Minidoka Pilgrimage group. They are opposed to the disruption of what, to them, is sacred ground. I have followed their activities for years and know that these annual visits are a deeply moving and emotional tribute to their history and ancestors. For the BLM to describe Minidoka as simply a tourist and recreational site is insulting and dismissive. The US government made a cruel decision when all citizens of Japanese ancestry were originally sent to internment camps. The Minidoka Camp has been declared a national historic site, a step toward healing and acknowledging the damage done to those people. Please respect that history. To build a disruptive wind project adjacent to that site is a step backwards. Do not reopen the wounds from this ugly chapter of US history. Find another site for the Lava Ridge project.
7318-3	Linda (No Last Name Provided)	Negative impact on the Minidoka National Historic Monument which "now stands as a memorial to the nearly 10,000 Japanese Americans forced to relocate here during World War II." It would be disgraceful to spoil the land on which this historical monument stands. It is sacred and a reminder to us all about the evil of oppression. The Lava Ridge project and the plans to place others close by will greatly affect the sanctity of this area.
7331-1	Carol Clapp	It would be virtually impossible to convey what it was like to be interned at a place of such desolation if it is no longer desolate as is proposed. The historic value of this site and what sets it apart from other arid swaths of land is what happened here and how it must have been experienced; the proposal changes that experience.
7340-1	Rich Iwasaki	My issei (first generation) grandparents and my nisei (second generation) mother were incarcerated at Minidoka during World War II. As a sansei (third generation) Japanese American citizen, I'm very concerned that the number and size of the proposed wind turbines will dramatically affect visitors who come to remember and honor all those who were unjustly incarcerated at Minidoka during World War II. For many Japanese Americans, the Minidoka site is a sacred place of reflection and healing for the survivors and their descendants. The traumatic experience of Minidoka affected thousands of issei and nisei, and the site is a stark reminder of lives drastically altered and changed forever. The stories of the unfair imprisonment of Japanese Americans must be told to educate those who remain unaware of the unjust loss of civil liberties that befell innocent US citizens. A forest of wind turbines will greatly diminish the profound impact of the Minidoka experience on descendants and others who come to learn and commemorate the time of inequality and race prejudice. It is vitally important that every visitor viscerally experience and understand what happened during this dark chapter in American history. While I and many others are not against alternative energy sources, all of the proposed wind turbine alternatives near the Minidoka site will have a negative impact on the integrity of this sacred and historic site.
7355-1	Name Not Provided	Use of Minidoka for BLM's purposes is a further insult to the Japanese American (JA) community who's civil liberties were already totally disregarded by our nation's government via incarceration of an targeted ethnic group. The wrongs of this act/EO9066 have been acknowledged by our government via reparations to the JA community whom were incarcerated. Through your proposal to develop Minidoka for general use other than the preservation of a historical site, BLM will be falling short of its mandate from Congress to ensure natural, cultural, and historic resources are maintained for present and future use. Use another piece of land.

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7357-1	Name Not Provided	Please do not move forward with the Lava Ridge Wind Project. The proposal has not taken into consideration the effect of the project on the Japanese-American community, who use Minidoka National Historic Site as a place of remembrance and healing. Completely altering the landscape of this site will erode the sacredness of this place for a community who has already been mistreated time and time again by public authorities in the United States. The needs of the Japanese-American community are just as important as any other cultural group's needs, and should not be treated in this way. Please listen to the community.
7358-1	John Okada	Let me start by stating that I am the son of incarcerated parents that were held at a relocation "camp." Although, my parents were incarcerated in Tule Lake, not Minidoka, I can say without a doubt that the land is sacred. You don't really get the feeling of how large these camps were without visiting and truly visualizing the enormity of the camp which held approximately 10,000 people unjustly and unconstitutionally held behind barbed wire fences with guard towers all around. Because of this and the reasons below, I would object to the Lava Ridge project. The DEIS fails to adequately protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience. The DEIS inappropriately identifies Minidoka NHS as for "Tourists and Recreationists" which reflects ignorance of the history of the location and its impacts. As stated above, this is a place of reflection and healing for survivors and descendants, as well as an educational benefit to make sure something like the incarceration never happens again. The DEIS fails to recognize the importance of the cultural landscape and preserve the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience. The DEIS fails to protect the view-shed. A "moderate" degree of visual change as stated fails to protect the integrity of Minidoka NHS. The only option that comes close is Option E. The BLM failed to notify the impacted population in Idaho and throughout the US before the Notice of Intent was posted on August 20, 2021. The BLM has shown a lack of deep knowledge of the history of the cultural properties of the site, that after WWII, the incarcerees were dispersed throughout the country. The DEIS: o Failed to include the importance of the education about the negative psychological effects of incarceration at Minidoka. See Donna Nagata's study here: https://psycnet.apa.org/record/2021-05763-007. o Failed to include the preservation of "immersive feeling of isolation" and somberness that, like protected at other National Parks such as the site of the Battle of Saratoga, Saratoga National Park, instill reflection and education on the historical event of the unjust incarceration at Minidoka. o Does not reflect nor address cultural competency as mandated in President Biden's Executive Order on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. o Does not include potential cumulative effects as other projects are being planned in the area.
7367-1	Lynn Yarne	I am a descendant of Minidoka survivors. My aunties, uncles, grandparents, and their parents were incarcerated at Minidoka. It is a wound. The Lava Ridge project gives me concern because disrupting this sacred site is a disruption to the healing of thousands of descendants who have been impacted. To place historic significance upon sites such as Minidoka is to speak to the importance of our past wrongdoings and commitment to a more equitable future. To treat Minidoka as simply a tourist site is to again silence the experience of our community and minimize the impact of our society's wrongdoings.
7379-1	Michele Fritzler	Please come up with a better solution and don't violate the sacred Minidoka land. Imagine going to Dachau or Twin Towers or any other memorial site meant to remember atrocities that should never happen again, and meant to remember the victims of the atrocities; and instead of a memorial, finding wind farms. As if to say, we found something more relevant to do with this land. That the land use is more important than remembering and solemnly committing to not diminishing the horrors done, in this case, the Japanese Americans being interned into camps Americans on American soil, by Americans!
8396-1	D. Handa	My grandparents, mother, father, aunts and uncles were all incarcerated here. In June 2016 I visited the Minidoka Historic Site and I was moved by what remains of the camp, its stark scenery, the remoteness, and the desolate dry surrounding countryside. The Minidoka National Historical Site is considered one of the most endangered in the country.
8610-2	Jaime Thietten	The World War II Japanese-American incarceration camp is NOT a place where “tourists and recreationists visit” as LS Power’s EIS refers to the visitors who come to this site. They are mourners, family members, and survivors coming to honor those who died or were incarcerated here. Belittling these visitors shows LS Power’s selfishness and lack of concern for not only our lands but the people who live and visit here. This misrepresentation is like calling our Veterans and their family members who visit the Vietnam Memorial “recreationalist and tourist”.
8624-7	Public Comments via Remote Video	The draft environmental impact statement process neglects to comprehensively account for the emotional impact on the internees, and especially on their children during their internment. The emotional effects of the internment, as those created by my reoccurring nightmare, illustrates that it has not been adequately addressed by the DEIS. Furthermore, the emotional impact has not been accounted for in the BLM's analysis of the impact of the proposed wind farm on the setting, emotion, and feelings associated with this historic site. The DEIS doesn't adequately include a framework and baseline for an emotional impact statement for the Japanese Americans interned at Minidoka. Finally, the bibliography supporting the BLM's analysis of the emotional impact of the Lava Ridge Farm on the Japanese American community is totally inadequate.
8626-14	Public Comment Mercer Island Community and Event Center	Having been to the site, I just feel like if the windfarm thing goes through, it's just going to totally ruin the -- I guess the emotions and the feelings, because it's going to make it so -- if that technology is coming in, all those things are coming in, and the sacredness of the site is going to be ruined. And I believe, you know, people say, well, it's a tourist spot. This is not a tourist spot. It can be, but for many of us who go there, it's much deeper than that. It's a place where we need to remember and not forget that this is part of U.S. history, not just Japanese American history, and it's so vital that we keep the -- I guess the environment the way it was.
8626-16	Public Comment Mercer Island Community and Event Center	I'm Erin Shigaki, and I'm a descendant on both sides of my family of the Minidoka concentration camp. And I support Alternative A, No Action, in regard to the Lava Ridge Wind Farm Project. That's it.
8626-24	Public Comment Mercer Island Community and Event Center	I just wanted to add on the record it was a little disappointing that some of the BLM staff like head of Public Affairs and a couple of others whose names I didn't catch were looking at photos of survivors and talking about how cute they were. I think it was pretty demeaning, and I just think, you know, they brought photos of them at the incarceration site that showcased that they were, you know, child prisoners, and then they just were told about how cute they were. So I just wanted to provide that comment just as a point of feedback, as a wish that, you know, we continue taking these conversations seriously and acknowledging that, you know, these were children prisoners. So, yeah, thank you.
8665-1	Ken Mochizuki	My comments regarding the proposed project are presented in this letter. My parents, grandparents and aunts—all were forced to spend some time, or the entire time, at the Minidoka War Relocation Center from 1942-1945. I had an uncle who was already serving in the U.S. Army before the outbreak of World War II—his name is listed on the Military Honor Roll monument at the entrance to the now Minidoka National Historic Site. Those family members never, or hardly ever, talked about when they were confined at Minidoka, or ever expressed any interest in visiting the site of their wartime incarceration. When asked about their time in “camp,” they answered with general or vague responses, indicating that that time in their lives was to be left in the past and was too impractical to be remembered and revisited. Or was there another reason? Michi Nishiura Weglyn, author of Years of Infamy, her book which was the first to expose the actual policies and actions of the U.S. government to establish and operate the “relocation centers,” said: “Many Japanese Americans have been quiet about the internment for all these years because it’s still painful to talk about what happened to us.” Was that, or part of, the real reason why my family members never openly talked about their time at Minidoka? Those in my family who were confined at the Minidoka camp are now gone. Other Japanese American families were more fortunate with learning about their pasts. A daughter of a Minidoka camp survivor talked about when she and her father attended the annual Minidoka Pilgrimage:

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		"… Basically, my dad had always shut down every time we tried to get him to talk about his experiences at Minidoka. Finally, when he was around 82, I asked him why he didn't ever want to talk about it. My dad said that he still got really angry about that time in his life and couldn't really articulate much more than that anger. In fact, he got visibly angry as he was explaining this to me. "We finally convinced him to come on a pilgrimage because it was good timing for most of our family to go, with mom, my aunt and uncle, and four of the five kids with some of the grandkids, too. As we arrived in Boise, and drove to Minidoka, my dad made a lot of comments like, 'I haven't been back here since I was 12 years old' (the year he was when he was incarcerated) and other observations about how the place has changed or stayed the same (it was very hot!). So, I think he was already beginning to look at the camp experience in a different light, actually being at the site of the camps. There were also other former incarcerees at the pilgrimage that he knew, so that helped him to become more comfortable as well, I think. "It wasn't until the third day, after we had had a couple of workshop sessions, toured the old barrack, and seen the canal and the entry of the camp when we had the small group discussion where my dad was invited to speak because he was one of only two former incarcerees in our group of a dozen or so. My son and I were fortunate to be in the group with him. My dad mostly talked about what camp was like in terms of the physical grounds, and a bit about having some sports to do, and also school (which he admitted that he sometimes didn't go to). But he also talked about how he was often by himself or had to look for his friends because the family was split up (his own dad worked elsewhere in the camp, his older brother was with his friends and then found a job in camp, and his sister eventually moved out of camp because an influential friend's family was able to hire her as a housekeeper back in Renton). He talked about not having his mom because she had died a few years before the war from illness. "He seemed really comfortable telling all this to complete strangers, as if he realized that there weren't many left to pass on this information, so he was concentrating on communicating well with the group. When he was done talking for a few minutes, one man thanked him because his father had never told him anything about the camp experience and had since passed, and others thanked him as well. My son and I were pretty surprised that dad spoke about so much, with much detail and so long, as this was the first time he had opened up to us and he usually didn't talk very much. Also, after the pilgrimage, he let me videotape him talking about more of his memories of camp and his childhood. "… [H]e was reluctant at first, but then being actually at the site somehow made it important for him to speak out, or maybe he felt relieved that he was able to come back to the site of such trauma and be okay." As the daughter said, her father was not there as a "tourist," but was healing from trauma in his past. This is why the land within seeing and hearing distance around the Minidoka site is essential to be left the way it presently is. Those who were confined at Minidoka need to see what they saw around them back then. This daughter's story illustrates why the descendants of the Minidoka camp survivors consider the Minidoka National Historic Site as a sacred and revered place to revisit and learn. The Lava Ridge Wind Project would have more to gain if it showed a simple act of respect by not erecting the wind turbines there.
8788-3	Sue Page	It disrespects the Japanese Americans interned at Minidoka National Historic Site. It dishonors the Native American Tribes which hold the surrounding lands scared. This beautiful land must not be disfigured by 400 740ft tall wind turbines, football field sized blades and blinking lights that will destroy our night skies.
8825-1	Paul Murakami	My name is Paul Murakami. I am 73 years old. My parents and grandparents were incarcerated in Minidoka, block 26, after being forcefully removed from their home/business in Seattle, WA. Their only 'crime' was being of Japanese descent. They did not talk a lot of their incarceration with myself or my 3 siblings while we were young. Now that I am older, and my parents and grandparents have all passed, I reflect back and think they didn't want to burden us with the hardships of the past. There is a Japanese word, 'Gaman', which means enduring the seemingly unbearable with patience and dignity. I believe they applied this philosophy during this oppressive period in their life. My father volunteered and enlisted in the U.S. Army in Minidoka. I was told my grandmother sent my father's older sister to the recruitment office to nullify his application. However, she was unsuccessful since he was 18 years of age. I, too, had a difficult time understanding how my father could volunteer for a country that has treated his family so unjustly. His answer was always… "I am an American". He proudly served his time in the army with the all Japanese American 442nd Infantry, I Co.. These are the images in my mind when I visit the Minidoka National Historic Site and imagine the hardships my family and those of others faced during this unjust time. I strongly ask that you consider moving the Wind Project which will not interfere audio/visually with this site.
8829-1	George Snyder	I am writing to you in regard to the proposed Lave Ridge wind farm project that will affect the Minidoka Japanese internment historic site. I believe that it would be a disservice to not only the Japanese members of our communities but also to all people to have a historic site such as this be lessened by this project.
8868-1	Gerald Kita	Lava Ridge Wind Project EIS and the Minidoka National Historic Site The Bureau of Land Management, Department Of The Interior, constructed the Minidoka mass internment camp that housed Japanese Americans during WW II. Minidoka has been declared a national historic site. Recently, a company, LS Power, proposes that the Bureau approve location of a wind turbine farm to generate electrical power adjacent to Minidoka. It is a conflict of purpose for the Bureau to degrade a national historic site Minidoka, on land of which the Bureau is in charge, to locate a wind turbine farm adjacent to a national historic site. Please consider denial of the Lava Ridge Wind Project EIS to avoid degradation of the Minidoka National Historic Site I am a former internee of the Heart Mountain Wyoming internment camp during WW II.
8875-1	Andres Tangalin	Thank you for the opportunity to make my personal comment. The Lava Ridge project will compromise the Minidoka National Historical Site as an honorable and grim reminder of our nation's incarceration of Japanese Americans. The dignity to reflect on the physical, emotional, mental, and economical harm to Japanese Americans are the most important features of this Site to preserve. The Lava Ridge project would violate the sanctity of the visitation experience, directly marginalizing the suffering that the community of survivors and descendent's pay homage to. The preservation of an aura of personal contemplative space and privacy respects the visitor's remembrance as well as the national intent of validating the legacy of our nation's missteps in violating the civil liberties of Americans based on ancestry.
9006-1	Carol Suehiro	With a major in Geography from the University of Washington, I am well aware of the relationship between people, the environment and the purposeful use of natural resources. In my travels, both nationally and internationally, I often photograph these large modern windmills that harness wind power for human use. I find them fascinating and give credit to science and technology in their development. I see little analysis of the human toll and ramifications of the construction of the massive Lava Ridge Wind Project on the Minidoka National Historic Site. Would we allow France to place such structures next to the Epinal American Cemetery and Memorial? This cemetery is a tragic part of American history. We will not forget that Japanese American soldiers were killed fighting in Europe during WWII while their families were incarcerated in camps like Minidoka. Most Japanese American families asked that their family member's body be returned to America to be buried. Go to Bruyeres, France and see young people who are still grateful to the Japanese American soldiers that saved and liberated their town from Germany while their own families were not free. This respect and appreciation by the townspeople of Bruyeres have been passed through the generations by historical memories. Future generations should never be left with the impressions that whatever sacrifices and sufferings were made by any portion of American Society has no meaning or purpose. These sites and pilgrimages are reminders of the horrors of war whether nationally or internationally. The Minidoka National Historic Site should never be camouflaged, dismissed and sidetracked by these huge hypnotizing rotating turbine windmills. What happened at Minidoka is part of American history. The integrity of American history is not disposable, but the Lava Ridge Wind Project erodes our past.
9033-1	John Mellana	The currently proposal by a private corporation for four hundred wind turbines to be sited both within and adjacent to the Minidoka NHS comes far too close to being a desecration of hallowed ground. Merely substitute the name Minidoka" with locations such as Gettysburg, Little Bighorn, Angel Island and Manzanar, and the inappropriate essence of the site selection for the Lava Ridge project is clear. Please find a better place for what is otherwise the commendable and much-needed development of cleaner energy sources.

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9080-1	The Coalition to Protect America's National Parks	I am writing on behalf of the Coalition to Protect America's National Parks, which represents over 2,400 current, former, and retired employees and volunteers of the National Park Service. Collectively, our membership represents over 45,000 years of national park management and stewardship experience. Our membership includes former National Park Service directors, deputy directors, regional directors, and park superintendents. Recognized as the Voices of Experience, the Coalition educates, speaks, and acts for the preservation and protection of the National Park System, and mission-related programs of the National Park Service. As a national parks advocacy group, we are quite concerned that the proposed Lava Ridge Wind Project would be constructed immediately adjacent to Minidoka National Historic Site (NHS)1 in south central Idaho. We offer the following comments about the January 2023 Draft Environmental Impact Statement (DEIS) for the project. INTRODUCTION As described in the Federal Register Notice,2 Magic Valley Energy, LLC (MVE) has applied for a right-of-way (ROW) grant to construct, operate, maintain, and decommission the Lava Ridge Wind Project (LRWP or Project), a wind energy facility and ancillary facilities primarily on BLM-administered public lands in Jerome, Lincoln, and Minidoka counties, Idaho. The Project would consist of up to 400 wind turbines and associated infrastructure, including new and improved roads, powerlines for collection and transmission of electricity, substations, operation and maintenance facilities, and a battery storage facility. The Project area spans 197,474 acres and all project components would be sited within a series of corridors. These corridors are approximately one-half mile wide and cover approximately 84,385 acres, of which 75,760 acres are located on public lands managed by the BLM, 2,910 acres are on State lands managed by the Idaho Department of Lands, 5,417 acres are on private lands, and 288 acres are on lands managed by the Bureau of Reclamation. All wind turbines, powerlines, and associated infrastructure would be located on lands managed by the BLM and the Idaho Department of Lands. However, less well described in the Federal Register Notice is the fact that the entire Project Area is located immediately adjacent to Minidoka NHS,3 a unit of the National Park System managed by the National Park Service (NPS), and the larger 33,000-acre footprint of the Minidoka War Relocation Center (WRC), which is located primarily on public lands managed by the BLM. As a result of its proximity to these historically and culturally significant sites, the Project poses significant risk of adverse effects to historic and cultural resources in the Project area and as a result is generating significant controversy.
9080-60	The Coalition to Protect America's National Parks	CLOSING COMMENTS As described in this letter, we have multiple concerns about the proposed development of the Lava Ridge Wind Project in close proximity to Minidoka NHS and the larger Minidoka War Relocation Center (WRC). We and others believe the WRC and portions of the surrounding landscape to be eligible for listing on the National Register of Historic Places. The proposed Project, if approved, would cause significant adverse effects to visual resources that are essential components of the landscape setting for these Register-eligible properties. For the many reasons summarized in this letter, we urge BLM and the Secretary of the Interior to select Alternative A (No Action) and deny MVE's ROW grant application.
9082-1	Scott Miller	I am a 67 year old white male living in Seattle, Washington and I am writing to support Option A: No Action. Just one month ago, I had an opportunity to visit the Minidoka National Historic Site, which would be desecrated by the proposed Lava Ridge wind project. My wife's father and his family were among the hundreds of Japanese-American citizens who were imprisoned here for no other reason than their heritage. It is a bleak chapter in our history; one it is imperative that we remember so it never happens again. What struck me most about my recent visit to Minidoka was the sense of isolation one feels when walking the grounds that were once encircled by fences and guard towers. It is important to my wife, and many other former prisoners and their descendants, to visit this site once a year in recognition of the sacrifice that previous generations made right here in Minidoka. Imagine being uprooted from communities where you were active and contributing members and being sent to such a remote place. The loneliness, the isolation, the sheer distance from these unfamiliar horizons to the place you call home. It is a powerful experience, properly called a pilgrimage. Yet the BLM's EIS classifies my wife and other descendants who regularly make this journey of remembrance as "tourists". This reveals a complete lack of understanding of the reasons Minidoka was designated as a National Historic Site. It is to keep alive painful lessons of the past. Why does this misclassification matter? Because it illustrates the BLM's complete lack of understanding of why Minidoka matters. How can the other judgements about impact elsewhere in the EIS carry any credibility when the agency gets what is at stake so completely wrong. It is frankly shocking that an administration that has made social justice a priority could make such a mistake. The reasons for supporting Option A: No Action extend beyond this insulting mischaracterization of pilgrims to the Minidoka site. Of the 400 wind turbines planned for Lava Ridge, each taller than the Space Needle, more than 300 will be visible from Minidoka. The sense of isolation experienced by those imprisoned here will be forever altered. That is simply unacceptable for those of us, of all races and backgrounds, who believe it is important for us to own our history so we don't make the same mistakes again. Protecting Minidoka as a National Historic Site was an important step in that direction. Why would BLM and the Biden Administration turn around and allow the desecration of a place so worthy of protection?
9119-1	John Okura	I consider myself an interested stakeholder in this discussion; over 80 years ago, my grandmother was incarcerated at Minidoka for the crime of being Japanese American. Unfortunately, this may not count as much to a corporation or even to some in the government, despite the national historic status Minidoka has. The Draft Environmental Impact Statement (DEIS) does not reflect a culturally sensitive understanding of the site and its' impact and identity in American history. The development of the Lava Ridge Wind Farm (Lava Ridge) will result in irreparable impairment of resources, affecting the land surrounding a place that should maintain the character of the time when American citizens were imprisoned within barbed wire fences onsite. The integrity of the site and its' viewshed would be greatly diminished when visited with a backdrop of a wind farm. Studies have concluded that the audio impacts alone will be significant, affecting the ability of survivors and their families to come and consider what was lost and those lessons that affect current events. As an International Site of Conscience, the installation of Lava Ridge would be a slap in the face of all seeking healing and reflection at this site. The unfortunate characterization of the Minidoka site as for tourists and recreationalists reflects an astonishing lack of sensitivity and recognition for the injustice that was inflicted upon Americans both at Minidoka and elsewhere. Would it be acceptable for a DEIS to characterize one of the Spanish missions or the Evers home in Jackson, MS as sites for tourists and recreationists? Yet, defenders of Minidoka are in a position of having to justify the cultural importance of a site where Americans were unlawfully imprisoned, with this importance being trivialized as for tourists. This is not acceptable, and is not in keeping with President Biden's recent EO on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. It is my greatest hope that the Shoshone BLM, like their namesake would have a deep appreciate for the lands under their jurisdiction, and deny the Lava Ridge project.
9129-1	Bruce Rutledge	I am writing in protest of the plan to build a large wind farm near Minidoka, a place of profound cultural importance. This is a place of contemplation and reflection for many Americans, especially the Japanese Americans whose families were incarcerated here. But it is also a place of reflection for all Americans who rue the decision to imprison our fellow citizens during wartime hysteria. The large wind farm being planned will overwhelm the landscape. There are certainly better options for this farm. Please reconsider the location of this project.
9145-1	Margaret Gotchy	I am writing to urge you to stop the Lava Ridge Wind Project, in which 400 wind turbines would be erected near the original Minidoka concentration camp in Idaho. Such a development would be a national travesty. Both my brothers and I are immediate descendants of my entire family—paternal and maternal grandparents, numerous aunts, uncles, and cousins—who were unconstitutionally incarcerated at the Minidoka War Relocation Center in 1942. This incarceration was a traumatic event that left entire generations of families with deep emotional scars. In July, 2017, my husband and I participated in a pilgrimage to Minidoka on the 75th anniversary of this injustice. It was only through this visit that we were able to learn the true history of this incarceration since my parents and grandparents were too traumatized to ever talk about their experience, and the subject was never really addressed in school. It was here that we learned how common this ignorance about this act of racism really was. One participant in the program recounted how her niece at her college in the mid-West had received a failing grade on her final term paper when she had written about the American concentration camps during WWII. The reason for the failing grade? Her professor insisted that she had not written about a factual historical event!

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		It is for this reason that the Minidoka National Historic Site must be protected as a place to educate the public about the unjust incarceration of 13,000 Americans of Japanese ancestry during WWII, as well as to hold lessons to help Americans understand the roots of racism in our society.
9154-1	Kelis Giswold	My great grandmother hung herself at the Minidoka internment camp while her sons where fighting in the 442nd battalion during WW2 for the United States. My uncle was born behind the barbed wire of Minidoka. My grandma could barely tell me about that horrible time it was so traumatic for her. When I visited many years ago it was barely a pile of rocks in a barren feeling landscape. I couldn't imagine what it must have been like for my family to be dislodged from their lives and moved to that place. The landscape seemed inhospitable. My grandmother told me there were little piles of sand that would pile up day after day inside her barracks from the incessant winds. The weather and remote landscape is much of what that experience was for her- and what needs to be remembered. Please do not go forward with the Lava Ridge wind turbine project. It will detract from the visual impact of the Minidoka National Historic site, once again disrespecting the Japanese-Americans and their history. And stealing the truest experience of what lessons, memories and healing that place has to offer to current and future generations. One day I will take my now 6-year old daughter there and I hope that she can experience as accurately as possible what her great grandmother, cherished great uncle and family experienced. Large wind turbines in the horizon would most definitely detract from her feeling the remoteness of Minidoka. I'm happy to hear that the history is being captured by the NPS and teaching what happened so that it never happens again. Please do not allow the Lava Ridge wind turbine project to progress.
9166-1	Mary Gleysteen	I oppose the proposed LavaRidge project due to its potential detrimental effects on the Minidoka National Historic Site which I have visited and which I hope will be further developed and enhanced so that others can learn about this largely ignored shameful chapter in US history. The construction and operation of a wind farm so close to the Historic Site which honors the people wrongfully incarcerated there will certainly have an adverse impact on not only the descendants of people affected by the racist relocation of their forebearers, but also people like me who are seeking to become more aware, responsible and better citizens of the United States. People visit the Minidoka National Historic Site to learn their history and to honor those imprisoned there, not as tourists or recreationalists. Our understanding of the significance of what happened at the site should not be obscured or minimized by proximity to an immense wind farm which will overshadow and dominate the view of this location whose very desolation is a significant part of its history. What I have read of the Lava Ridge DEIS does not seem to address my concerns about damage to this site as a shrine to the powerful effects of the isolation and unjust and racist incarceration experienced there as well as the need for all of us to understand what it represents in order to prevent its happening again.
9219-1	Pamela Ching-Bunge	To locate the huge wind farm near the Minidoka Historical Site is another shameful action against all Japanese-American citizens in particular against survivors and families of Minidoka. This site is not just a museum. It is the place where my lifelong friend was born; it is where his grandmother committed suicide overcome by depression; it is where so many innocent children, elders, adults, all prisoners/internees fought anger, injustice, undeserved shame, and depression caused by loss of freedom, homes, businesses, livelihood...normal lives. BLM, leave the site at peace. A wind farm nearby will change the sacredness of the area. With the vastness of the high desert regions, please consider alternative sites.
9237-1	Diane Feller	I am writing in reference to the Lava Ridge Wind Project being considered for Bureau of Land Management (BLM) managed lands near the Minidoka Internment Camp National Historic Site. Bottom Line: Wind Generating Turbines should not be built within easy view of the Minidoka Internment Camp. While there is no question greener power generation is needed for the long term survival of the Planet Earth, there are millions of acres available for building wind projects. But it is also very important to preserve the record of past mistakes on the part of governments, a large one being the internment of Japanese-Americans during World War II. Minidoka helps hold in place a solemn reminder that we must all keep on watch as those who are free today may tomorrow find themselves as the targeted group. Keeping wind turbines from view maintains visitors of the solemnity, the loneliness, and the abandonment of people who were just ordinary US Citizens, contributing to our overall society. Placing turbines in view has an implication that this National Historic Site does not memorialize something important, but would instead help relegate it to just something that happens to be on land generating power. Thank you for your consideration and Thank you for not allowing the Lava Ridge Wind Project to continue.
9239-1	Steve Feller	I am writing in reference to the Lava Ridge Wind Project being considered for Bureau of Land Management (BLM) managed lands near the Minidoka Internment Camp National Historic Site. Bottom Line: Wind Generating Turbines should not be built within easy view of the Minidoka Internment Camp. While there is no question greener power generation is needed for the long term survival of the Planet Earth, there are millions of acres available for building wind projects. But it is also very important to preserve the record of past mistakes on the part of governments, a large one being the internment of Japanese-Americans during World War II. Minidoka helps hold in place a solemn reminder that we must all keep on watch as those who are free today may tomorrow find themselves as the targeted group. Keeping wind turbines from view maintains visitors of the solemnity, the loneliness, and the abandonment of people who were just ordinary US Citizens, contributing to our overall society. Placing turbines in view has an implication that this National Historic Site does not memorialize something important, but would instead help relegate it to just something that happens to be on land generating power. Thank you for your consideration and Thank you for not allowing the Lava Ridge Wind Project to continue.
9285-1	Polly Aird	Stop the Lava Ridge Wind Project! I am not of Japanese descent, and my family was not incarcerated, but I have been to Minidoka National Historic Site as well as to the Japanese-American Exclusion Memorial on Bainbridge Island from where those of Japanese descent were rounded up and shipped off, most of them ending up in Minidoka. This is a critical piece of our American history that we must never forget. If you live on Puget Sound, as I do, you are aware of the world those incarcerated came from—a world surrounded by water. To be taken to Minidoka meant not only being imprisoned, but without any connection to the sea they loved. Minidoka is a lonely, windswept place where one can imagine the desolate feelings of those so unjustly kept behind barbed wire. As Americans, we need to be aware of our history, especially parts like slavery and incarceration, that are blots on our values. As a nation, we need healing from the times when we failed to live up to our ideals and resolve to never repeat them. Minidoka is one place where one can visualize the cruelty we imposed on others simply because of their race. The lesson that this must never happen again is critical to what Minidoka is all about. The DEIS fails to protect the significance of the land surrounding Minidoka NHS land that helps those visiting the site to appreciate what happened here—its isolation, its cold and windswept nature in winter, its burning, shade-less heat in summer, and its cruelty. It is a place where those who descend from the incarcerated can reflect and hopefully find healing. It must not have a for-profit enterprise with hundreds of wind turbines on its adjacent land, desecrating the importance of this place in national history. The DEIS claims that Minidoka NHS is for Tourists and Recreationalists. Nothing could be farther from the truth. It is where people can come to reckon with a national sin. The DEIS thus ignores a critical piece of our American history. The DEIS fails to preserve the feelings of isolation and oppressiveness that places like Gettysburg National Military Park have done so well. Do not permit the development of the Lava Ridge Wind Project!
9325-3	Saya Moriyasu	My name is Saya Moriyasu and I am a United States citizen - an American. As an American, our raw and true history is important to me. I want all the people I know to visit Minidoka and the other American concentration camps. It's a hard part of our history that needs more light upon it. The past is relevant today to marginalized groups and everyone living in the USA.

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		I am eco-conscious in my life. I drive a Prius, have solar panels, and eat a vegetarian diet. However, the site at Minidoka is NOT the place for a wind farm. The site's importance is huge and needs to be shown the respect that was not shown to those families incarcerated. The survivors are not tourists, and as survivors, they deserve extra respect for this history that they did not choose. When I drive across Washington State, I see wind turbines and hope they are creating a green solution to energy. I applaud wind energy in the right place. Last summer, I took a trip that included 3 of the concentration camps. Of those three (Santa Fe, New Mexico, Topaz in Utah, and Minidoka in Idaho) Minidoka is by far the best site to experience what the survivors endured. Going to the sites is an important way to learn about history. I'm forever changed by visiting those sites. Even though I've listened to, read, and watched stories and documentaries about the camps, it can never be replaced by visiting them. The isolation of the Minidoka site and the views of the surrounding area is part of the experience. Driving up to Minidoka, you experience the site of a guard tower and the guard station. It's a feeling of leaving the present and entering history. The walking tour and signage helped me to internalize the experience of arriving at such a desolate place. So very far from my home in Seattle, it's a scary and jarring feeling. Seeing the buildings that have been put back on the site. And the enormous root cellar that was made by the Japanese Americans is uniquely impressive. The very act of generosity in feeding themselves and others during the war. Thinking of the humiliation that they must have felt. In addition sons and husbands going to fight in the most decorated unit, the 442. Proving their valor, fidelity, and patriotism. President Biden has promised to "advance equity and environmental justice." Minidoka needs to be protected as a place for healing and education. The 73,000 acres on BLM lands are public lands and should serve the greatest good for our citizens. Having 400 large turbines surrounding Minidoka is NOT acceptable. The attached size comparison really brings it home that the wind project needs to go somewhere else. I urge you to choose Alternative A.
9371-1	Catherine Norton	Please do not build the Lava Ridge Wind Project near the Minidoka National Historic Site. To do so would dishonor this monument to the memory of the terrible injustice that Japanese Americans suffered during World War II. These people and their descendants deserve to have a serene location to honor their families and others who were incarcerated there. As a 68 yo native of the Puget Sound, I wasn't taught about Minidoka and other internment camps in school and they didn't become common knowledge until 30-40 years ago. I am ashamed about that part of US history. The least our country can do now is cooperate with the affected US citizens and those who want to visit it by preserving this site as it is. President Biden signed an executive order that addresses equity for Asian Americans and how this site is treated now is an excellent example of applying those pledges with deeds.
9401-1	Nancy A Loizeaux	I encourage the Bureau of Land Management to value the history of the Tribes, the Japanese American interment and the EIS noted negative impacts on these people and the native wildlife. There is not an economic benefit that can usurp the historical damage as a result of this project. Please deny the application for the Lava Ridge Wind Project.
9408-1	Gary Heyamoto	I am an immediate descendant of two Japanese Americans, both Nisei's born in this country as US citizens, both unjustly incarcerated at the Minidoka War Relocation Center solely due to their race, both denied their constitutional inalienable right to liberty, dignity and privacy and both willing, postwar, to integrate back into society but not necessarily willing to forgive or forget the atrocities of the US Government. Imagine being wet, cold, hungry and injured hunkered down in a foxhole with bullets flying overhead. Now imagine fighting overseas in an all Japanese, (yes, segregated) unit (the 442nd) defending freedom in Europe while your own families are illegally incarcerated back home by your own government. My father didn't have to imagine it. He lived it. He came home with two Purple Hearts, a Bronze Star, a Presidential Unit Citation, a Combat Infantry Recognition Award and an Army Good Conduct Medal. He also came home to discrimination, racism, disrespect and prejudice. On top of that, in the years following the war, our families had to endure governmental inequities in job opportunities and in housing discrimination (See Race Map Seattle/King County 1960). As a child I had my lunches stolen, my homework taken, was forced to walk home in ditches, called names and had rocks thrown at me. I was not allowed to play Little League on my grade school team because the local Elks Club sponsor would not allow it. This was nothing compared to what my parents went through, but it was discrimination and racism just the same. Now, the government wants to go after our pursuit of happiness. If it's inappropriate to choose Arlington National Cemetery, the 911 Memorial, the FDR Racist Library or the Holocaust Museum as a site to erect wind or solar farms, so is it to desecrate the Minidoka National Historic Site in this manner. It would be an insensitive display of governmental apathy if the Lava Ridge project would be allowed to go forward. Minidoka is a sacred place for many. A place and time where an entire generation came together to support each other and survive the harsh prison conditions. Rationed food, cold showers, barbed wire fencing and armed tower guards imprisoned entire families whose only "crime" was being of Japanese ancestry. Minidoka has become a place of pilgrimage, a place for us to remember lost dreams/opportunities, to pray and most of all, to pay homage to those who died as prisoners there. It has become a sacred place. For many, it is hallowed ground. We did not ask to be there, did not deserve to be there. And now, they want the National Historic site to serve their needs. How insensitive, unjust and inhumane can that be? Is it not enough to have erased this egregious act of racism from school textbooks? It's unimaginable our government can be so disrespectful and so uncaring to allow desecration of the very site they selected to commit their homeland war crime; their homeland hate crime. But, as history has shown, the US Government is racist. History has documented they've used their narrow-focused wants and needs over other's rights (see Native American history) conveniently justifying their actions as "eminent domain" or unsubstantiated "public safety". So, I wouldn't be surprised if Idaho unsympathetically allows destruction of a sacred National Memorial site in the name of the "greater good". After all, Coeur d'Alene had the white supremacist Aryan Nations headquarters at Hayden Lake for decades for their "white-only homeland" in the Pacific Northwest. As of 2021, the Southern Poverty Law Center lists six hate groups (Proud Boys, Patriot Front, G416 Patriots, Lordship Church, Independent History and Research and The Brother Nathanael Foundation) in Idaho. Hate crimes are also on the rise (Fifty-four hate crimes in Idaho were reported to police in 2020) with 19 targeting racial groups. Yet, Coeur d'Alene's mayor Tim Hammond is proud to claim, "We are a culture of love and kindness." We don't live in the "land of the free" and there is no "justice and liberty for all". So, go ahead and desecrate the sanctity of Minidoka. It's just another act of injustice apathetically perpetrated by our government. Justice for all. It's all a myth the US Government would like us to believe in. A myth, not unlike the tooth fairy. Gary E. Heyamoto, DDS REFERENCES: https://www.seattletimes.com/opinion/dont-desecrate-minidoka-memorial-to-japanese-american-incarceration/ https://www.seattletimes.com/nation-world/coeur-dalene-hate-group-arrests-extend-north-idahos-long-history-with-extremism/
9483-1	Susan Tripp	The Minidoka community of survivors and descendants deserve the respect and acknowledgement of this gross historical violation of civil liberties by our nation's government through the preservation of the site. The Minidoka story must be recognized and treated in an honorable and somber manner as other painful events in our nation's history. The proposed Lava Ridge project minimizes the trauma, loss, and humiliation suffered by Japanese Americans based solely on their ancestry. My parents, aunts, uncles, and grandmothers were incarcerated at Minidoka. In their memory, Minidoka must be preserved. Do not allow this project to continue. What seems minimal to you is a major insult to those who were forced to live there.
9503-1	Caroline Parker	I am writing to ask that you pursue the Bureau of Land Management's goals in a way that does not desecrate the Minidoka National Historic Site. As someone with a longtime friend whose family was tragically incarcerated at this site, I believe that it is crucial that we honor and protect this historically significant site so that families who suffered the injustice of incarceration may continue to make pilgrimages to this hallowed place for continued reflection and healing. While harvesting the power of the wind is an important goal, there are larger issues at stake here. Failure to protect land at the Minidoka National Historic Site will only bring further shame on the U.S. government for this tragic historical event.
9509-1	Lisa Wareham	I was pleasantly surprised when I came upon Minidoka. Embarrassed, I had never heard of it. What an important part of our history to acknowledge and teach to each coming generation! Please appreciate that and find another location for wind turbines.
9523-1	Bev Ikeda	Please keep the Minidoka National Historic site, near Minidoka Idaho, free from the physical and visual impacts of the wind farm proposals. The Lava Ridge project will desecrate the landscape surrounding the historical significant land where thousands of Japanese Americans were incarcerated during World War II, due to racism. The site needs to be preserved with its surroundings untouched.

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		We as a nation, need to preserve historical and environmental areas, without visual pollution or enroachments of commercial enterprises. Wind turbines are large visual distractions and interrupt the desert/open landscape. Similarly, you would not build wind turbines near Arlington National cemetery, Old Faithful at Yellowstone National Park, or near the Statue of Liberty. Please honor this land and stop the building of the Lava Ridge Wind turbine farm.
9598-1	Ryan Anderson	My grandparents were at Minidoka, and this proposed wind farm would destroy the historical relevancy of the site. Instead of using this camp as a reminder of history, the wind farm would turn it into an opportunity for money. There's plenty of other areas to put a wind farm in Idaho, the state is huge. I had the opportunity to visit Minidoka 2 years ago, and the absolute vastness of the site were both eye opening and sorrow-filled. This part of the state is very flat, and putting a wind farm in would diminish the impact that the site has on people visiting, as well as the people who were kept there. Please do not let this wind farm happen. The last thing we need as a nation, is for a reminder of a "black-eye" of American history to be further erased and forgotten because of money.
9657-3	Saiyare Refaei	I ask that you reconsider an alternative location for this project because as it stands the leading Alternatives C and E still will impose on the immersive feeling and impact of the ambiance of the Minidoka National Historic Site that is critical in the educational aspect of the experience. I support better energy alternatives but after talking to community members and hearing an overwhelming sense of no consent to any of these alternatives this project should not come to fruition. If there is not proper consultation and full approval from neighbors, local tribes and culturally significant sites that have been deemed historically significant then construction should not progress.
9729-1	Charles Young	I vigorously oppose any use of the land which detracts from the historical value of the detention camp site and what it represents with respect to discrimination as a political weapon in our country.
9770-1	Glenn Murakami	Ogden, Utah was home to my mother and her family in small part of the city. In the year 2000, my wife and I visited that area to see what remnants we could find of their existence and life thru some difficult times. We were shocked to find that the entire section where they lived and prospered was leveled and no sign of the Japan Town was left. It is now a Marriotts hotel complex. The address of their home and business is still there on a large utility box. My grandparents owned a noodle restaurant there. Later I found out there existed another Japanese-American community in Salt Lake City. It was razed to make way for the Salt Palace. We also visited Tule Lake relocation center. The only thing left is the officer's club which serves as a convenient store for the area. A trip to Camp Amache was also disappointing. All traces of their existence has been eradicated. Members of my family served in WW2 (442 RCT), Korean War (1st Cavalry) and I served in the Vietnam War. Is this a historical genocide to cleanse the consciousness of Americas many mistakes of non-whites and non-christians?
9899-1	Doreen Alexander	I am writing to comment on effects to the actual experience of the Minidoka National Historic Site location itself would have to be surrounded by Windmills so unnatural to the environment. When I moved to Idaho 21 years ago I was and still am very intrigued by the Minidoka site and the experience of walking the grounds. I am very interested in history and was so excited to research this area. We have made this site a family field trip for years and have spent much time researching the history of what happened here. This is a very sacred spot and one to be preserved for a life time. The actual thought of seeing windmills near the site completely degrades the importance of history itself and what this site means to our country. I have seen many mock up drawings of what this could possibly look like at various proposed variations and none of them provide any relief from the degradation of the site with the Wind Mills towering within eyesight. Please do not destroy the experience that we are blessed to have in out small town in Idaho.
9908-1	Ruth Tokumaru	I am writing to request that No development be allowed to infringe upon the Minidoka Concentration Camp historical site.
10424-1	Paige Blumenthal	I oppose the Lava Ridge wind project. It completely disregards important cultural aspects in Idaho's history and present. The DEIS fails to adequately protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience. We need green energy, but in implementing it, need to consider the crossroads of other important aspects such as cultural significance.
10433-1	David Cook	The Minidoka community of survivors and descendants deserve the respect and acknowledgement of this gross historical violation of civil liberties by our nation's government through the preservation of the site. The Minidoka story must be recognized and treated in an honorable and somber manner as other painful events in our nation's history. The proposed Lava Ridge project minimizes the trauma, loss, and humiliation suffered by Japanese Americans based solely on their ancestry. Please reconsider the approval of this project.
10434-1	Yahm Levin	Please take into consideration the importance of the Minidoka National Historic Site. Japanese internment during and after WWII is part of this country's history and in order to ensure we do not repeat it, we must keep historical sites and memorials accessible. A wind farm so close to this historical site will overshadow its importance. A wind farm (which is incredibly important to build!) can be moved to an area without historical significance. Please take this into consideration. Thank you.
10435-1	M Chapman	Minidoka is a national treasure for many people. We must keep this as it was as a reminder so it doesn't happen again. [...] Do not build these (important) windmills close or within eyesight of a national monument to our past with our eyes toward keeping our country moving forward.
10436-1	J Yamada	I'd like to voice opposition to the proposed wind farm project. As someone who has family and friends incarcerated there during WWII, it is important to keep the space as a reminder of what happened there. Though I recognize the importance of expanding renewable energy sources like wind farms, I'm also concerned that the same government that put my ancestors in concentration camps, is now seeking to erase that history by selecting this particular space. It is alarming to see the scale of each turbine and how it will impact the space.
10457-1	Gary Bohlen	Wind energy is only a temporary fix. Meantime, it's ruins the area I grew up on. Our homestead was 12 miles from the Minidoka Camp. Money can't be the only reason to do or not to do something. Stop the madness.
10459-1	Ryan Anderson	My grandparents were at Minidoka, and this proposed wind farm would destroy the historical relevancy of the site. Instead of using this camp as a reminder of history, the wind farm would turn it into an opportunity for money. There's plenty of other areas to put a wind farm in Idaho, the state is huge. I had the opportunity to visit Minidoka 2 years ago, and the absolute vastness of the site were both eye opening and sorrow-filled. This part of the state is very flat, and putting a wind farm in would diminish the impact that the site has on people visiting, as well as the people who were kept there. Please do not let this wind farm happen. The last thing we need as a nation, is for a reminder of a "black-eye" of American history to be further erased and forgotten because of mone
10474-1	Maddie Tawa	Eighty years ago, my grandmother was incarcerated in the Minidoka War Relocation Center during World War II because the United States government decided that she was the "enemy" on the basis of her ethnicity. These incarceration camps continue to exist today as a testament to what the Japanese American people have endured and evidence of one the worst mass incarceration events in our country's history. The Minidoka National Historic Site has become a place of remembrance and healing for the survivors of the mass incarceration event and their families, hence why annual pilgrimages are organized and executed consistently by prominent Japanese American organizations. It is a place of mourning, healing, and remembrance, not a destination for "Tourists and Recreationists" as the Lava Ridge Draft Environmental Impact Statement has called it. The construction proposed by the Lava Ridge project is described to have a "moderate" degree of visual change. 740 ft. tall wind turbines are not a "moderate" degree of visual change. They actively obstruct Minidoka's view shed and disrupt the history preserved by this open space. To add these turbines would be to erode Japanese American space and memory. Renewable energy is an important cause, to be sure, but when such projects begin with the occupation of spaces that are critically important to marginalized people's identities and histories, it is no longer "repurposing". It is colonization.
10475-1	Bobby Toda	I support Alternative A-No Action. Minidoka Historical site should be preserved as a reminder to future generations that your rights as a US citizen can be taken away by a stroke of a president. There is not much left of Tule Lake internment camp where many were imprisoned before being moved to Minidoka. Yes, it was a horrible and unjust time, but don't make it worse by erasing historic landmarks.

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10480-1	Lori Takahashi	am strongly opposed to the building of the Lava Ridge wind farm due to it's proximity to the Minidoka incarceration site. My family was jailed at Minidoka; my grandparents on both sides, my parents and cousins and friends. This imprisonment had a life-long impact on the incarcerated as well as influenced the upbringing of their offspring. To build a wind farm near the historic Minidoka incarceration center disregards the importance of the action of our government. The Japanese people affected were illegally imprisoned. Many of these people were Japanese-Americans - meaning they were American citizens and had done nothing improper or illegal to deserve such treatment. History should not be forgotten as there are good lessons to be learned. Ignorance allows repetition of past sins. Let's not let the Minidoka historical site be denigrated or diminished in importance by a wind farm. Let the site remain unchanged as is as a stark and harsh reminder of the injustices imposed by our government against innocent people.
10481-1	Millie Takizawa	My comments regarding the proposed project are presented in this letter. The Lava Ridge Wind Project Environmental Impact Statement ("EIS") fails to adequately protect the significance of the land surrounding Minidoka National Historic Site ("Minidoka") as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience. Furthermore, it is inappropriate to identify Minidoka's Sensitive Viewer Group as for "Tourists and Recreationists." The Japanese American community is at the forefront of protecting, honoring, and preserving Minidoka and its surrounding land. The EIS further fails to not only recognize the importance of the cultural landscape, but to also preserve the historic nature of the land, including the integrity of the site, the feeling and association of historic events, and its immersive educational experience. The integrity and viewshed of Minidoka will also not be protected with the "Moderate" degree of visual change proposed by the EIS. All of the above culminate in the emotional impacts of the proposed Lava Ridge project. The Minidoka community of survivors and descendants deserve the respect and acknowledgement of this gross historical violation of civil liberties by our nation's government through the preservation of the site. The Minidoka story must be recognized and treated in an honorable and somber manner as other painful events in our nation's history. The proposed Lava Ridge project minimizes the trauma, loss, and humiliation suffered by Japanese Americans based solely on their ancestry. In conclusion, the "No action alternative" should be the only choice for this project.
10483-1	Myra Hudson	Executive Order 9066 cruelly isolated and stigmatized my fellow Americans: mothers, fathers and children of Japanese descent. To allow construction of a wind turbine project on the hallowed grounds of the Minidoka internment camp would be a debasement of their pain and suffering. Even today so many years later, I understand the anguish that site still causes. Placing wind turbines there is repugnant, a cold act of denial. Please do not deny what happened at Minidoka. Allow it to remain a place of reflection and rememberance.
10485-1	Richard Osborn	Many people of Japanese ancestry in the Seattle area, where I live, have a direct connection to the Minidoka "camp", but rarely talk about it. They will talk about it if you bring it up but do not initiate anything about the "camps". Clearly, this subject is very painful. To continue the Lava Ridge Wind Project would add insult to injury, 80 years later. Surely there are less sensitive and less sacrilegious sites for this project. Please do not go on with this project in it's present form.
10486-1	Janna DeLange	I am strongly opposed to the project for the following reasons. The impact of the Lava Ridge Wind Project on Minidoka National Historic Site cannot be overstated. Most of these huge wind towers, as tall as 740 feet, would be visible from the new Visitors Center and would be extremely detrimental to the visitor experience and disrespectful to the survivors of Minidoka and their descendants. Minidoka National Historic Site is intended to be a place of reflection and healing for those who were unjustly incarcerated there, and a place of immersive education for those who come to learn about what happened to these American citizens during World War II. The EIS does not recognize the importance of the unimpeded landscape to the integrity of the site. For visitors like me, experiencing the complete unobstructed desolation and empty silence of the Minidoka landscape is crucial to our understanding of the unconstitutional removal of Japanese-Americans from their homes and livelihoods. I urge you to preserve this historic landscape for future generations, as both a memorial to those who suffered injustice and as an educational experience to help ensure that such things do not happen again. Please do not approve the Lava Ridge Wind Project.
10491-1	Robin (No Last Name Provided)	Do not destroy a legacy for a community that suffered under American government misguided and disturbing conduct. Don't even consider Alternative C.
10493-1	Name Not Provided	Lava Ridge Wind Project is impairment to Minidoka National Historic Site. The EIS is correct in stating that the impacts to the Japanese Americans environmental justice community are disproportionately high and adverse. Federal tax credits should not be used to subsidize the Lava Ridge Wind Project that has disproportionately high and adverse environmental justice impacts. This is absolutely contrary to the dignity of the nation and the Biden administration's commitment to environmental justice. To give federal tax credits (paid for by the American people) is yet another form of environmental injustice upon the Japanese American community. The Biden administration made a commitment to protect and preserve places associated with the incarceration of Japanese Americans in the Presidential Proclamation for the Day of Remembrance on the 80th Anniversary of E.O. 9066 on February 19, 2022. Now, to use the federal government's money to support a project that is exacerbating generational trauma and disproportionately impacting Japanese Americans yet again is hypocritical. The analysis in the EIS should describe the facts above, so that all Americans can read and understand why the Lava Ridge Wind Farm Project is in direct conflict with the Biden administration's supposed commitment to environmental justice and to the Department of the Interior's own responsibilities to "protect, preserve, and interpret the resources associated with the Minidoka Relocation Center" as stated in the enabling legislation for Minidoka National Historic Site.
10494-2	Name Not Provided	his project should have never gotten to this point, and the near unanimous opposition in Idaho and by the Japanese American community and historic preservation communities is evidence that DOI and BLM did not do adequate site analysis. You let Magic Valley Energy propose this project without considering the level of impacts to myriad resources, especially Minidoka National Historic Site. Your oversight has caused immeasurable grief and trauma to me, my Japanese American family and Japanese American community. The BLM should be ashamed of itself. The consultants who are hired for this project should know they too have caused harm to the Japanese American community. By working for and taking money from LS Power, the consultants are complicit in the environmental injustice to the Japanese American community. Using words like "visitors" and "recreationists" for those individuals and descendants who are associated with Minidoka is repugnant. Japanese Americans have for decades tried to undo the shame associated with the incarceration and heal from these wounds caused by the federal government and larger American public at the time. Instead of our community organizations focusing on public education and healing, we have had to galvanize our energy, money, and time to fight for the protection of Minidoka, which we now consider a sacred site. You should include this in the EIS as further evidence of injustice to our community. All I've seen in weak leaders who have not stood up to take a moral stand against this project because of the impacts to the Japanese American community and legal responsibilities to protect Minidoka and its resources. I'm so severely disappointed in the Secretary of the Interior, Director of Bureau of Land Management, and Director of the National Park Service who care more about their political careers rather than the people and resources of the United States. I know the conflict of green energy and environmental justice playing out in this project, and to see how cowardly these appointed leaders are related to this project is disgusting. [...] The no build option is the only option. Mitigations cannot address the harm that has, is, and will be dispensed from this project. The BLM should select Alternative A based on the impact analysis, dignity of the nation, and as representative of the people who care enough to write comments which are overwhelmingly against this project.
10497-1	Rachel Nathanson	am opposed to the impact from the wind generator proposal on the views and legacy of the Minidoka Memorial. I am a member of the Board of Directors of the Holocaust Center for Humanity in Seattle. We use the lessons of the Holocaust to teach greater understanding of each other, promote caring and reduce hate and bigotry. The lessons of our history are here to teach us how to be better citizens and neighbors. This is what the Minidoka Memorial does. Do not reduce the impact of this important remembrance. I am very much in favor of wind turbines as a better method of producing power and reducing green house gases, but not at the cost of our historic heritage and memorials. Please find another location for these turbines, one that does not impact the Minidoka memorial.
10498-1	Name Not Provided	This is a terrible thing to foist upon a the American citizens, denied their Constitutional rights and put in a concentration camp. Now the memorial is going to be degraded by noisy, unsightly wind turbines, disturbing the peace of this almost sacred site.
10499-1	Karen Yoshitomi	I would like to express my strong opposition to the Lava Ridge Wind Project being considered on the historic footprint of the former Minidoka War Relocation Center in southern Idaho. A massive wind farm of nearly 400 turbines stretching across 40 miles will negatively impact the barely acknowledged tragic historical significance of the area. The wind project drastically changes the landscape and takes away from the historical value of Minidoka. In order to adequately portray the landscape as it

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		was when Minidoka was in operation, the turbines do not preserve the Minidoka experience as it was during the war. In 1942, more than 120,000 people of Japanese descent (2/3 American citizens) were mass incarcerated in concentration camps throughout the United States. Minidoka held more than 13,000 people before the war's end. This camp, like all the rest, was purposely built in a desolate location: deserted, uninhabited, and empty. History also states that many men and women volunteered out of these camps to serve in the United States military. The all-Japanese American 442nd Regimental Combat Team was the most decorated unit for its size and length of service in the entire history of the U.S. military. About 18,000 people served, earning over 4,000 Purple Hearts, 21 Medals of Honor, and an unprecedented seven Presidential Unit Citations. Of the ten camps, the highest number came from Minidoka: more than 900 incarcerees served the U.S. during WWII. The Minidoka site is a sacred site for the dwindling number of survivors and their descendants. The Minidoka site as it is, holds the full story, both historically and geographically, of an embarrassing part of American history. Never forget. Do not let it ever happen again.
10503-1	Amy Myoraku	For way too many years I was ashamed to say I was born in Minidoka because then I would have to explain "camp" and even though we left when I was a year and a half I internalized the shame of being Japanese. Our family and friends rarely talked about our experience except in very general terms. It was only in the last 20 years or so when Minidoka became a National Historic Site that I embraced my heritage. We need our government to acknowledge the importance of Minidoka not just to Japanese-Americans but so everyone will know that by remembering a past injustice it will not happen again. The Lava Wind Wind Project will overshadow Minidoka and minimize its importance. I implore you to consider another site.
10523-1	Cammie Hall	I don't have a long prepared statement but I hope that you will understand my experience. During WWII my family was "relocated" to the Minidoka camp. It's where my grandparents met and were married, and where my mother was born. We have history and a deep connection to that place. As a child we visited the site of the camp - which at the time had only a marker. When asking for directions almost no locals we met knew anything about the camp, which I find both sad and frustrating. My understanding is that the Lava Ridge project would complete do away with the memorial center that has since been built at the site of the former Minidoka camp. Given the nature of the project there needs to be a way to both honor this nation's history and provide renewable energy - there must be a middle ground somewhere. This country has a deep pattern of erasing exactly those parts of our history that need to be remembered and honored, so that they don't happen again. Please don't be a party to the ongoing trauma to our communities and this country.
10545-1	Traci Wood	I am not for Lava Ridge Wind farm. This will disturb the Minidoka Memorial Site. The view will not be honorable to the relatives and survivors of this Site. This will desecrate this memorial site and will not be what pleasant to those who come to the Memorial for healing and history. 400 wind turbines aren't healing or peaceful. They will be an abomination!
10566-1	Ron Nakatani	My name is Ron Nakatani, my mom Jessie Hirai was interned in Minidoka. To have the "Lava Ridge Wind Project" constructed close to the Minidoka camp site will disrupt the solitude of Minidoka. "Lava Ridge wind project will mar the site, to what end? Power generated goes to California, workers come from out of state and Idaho is not benefiting from this project. Please consider rejecting this proposal. This proposal will do harm to ecology of the area, such as migration routes of birds, deer & elk, why put up this wind farm? Makes no sense. Please stop this project.
10573-1	Peter Altmann	I am writing out of concern for the sanctity of the Minidoka incarceration center. The center was the end result of a travesty of the life and property of American citizens of Japanese decent. Minidoka is a shrine and remembrance of this grievous error. Its location was selected because of its desolation. Part of its meaning and beauty is this desolation. I am concerned that the imposing of tall wind machines upon the landscape would affect the isolation that was part of the camps selection. It was the shear isolation of our citizens imprisonment that is part of the shrine. The wind machines would remove some of the desolation that our citizens were condemned to.
11184-1	Darryl Ford, Sheila Ford	Wind turbines are unreliable, and expensive. They can only operate within a limited range of wind speed, and must be managed to stay within range. Weather, as we have seen in Texas affects their operation and when relied on too heavily, can cause blackouts. Many of the materials used in their manufacture come exclusively from China where mining is not environmentally regulated. Those materials are not easily disposed of when the machinery becomes worn out. Construction requires much fuel from whatever source to transport the enormous parts to construction site. Were they transported on electric vehicles (most are not) electricity relies on substantial amounts of oil for its production. Transmitting the power produced will require use of enormous amounts of land and materials for transmission towers and lines. The aquifer affected extends nearly across the entire State, quite possibly endangering the well water that serves us here in Western Idaho with the blasting required to establish foundations for the hundreds of turbines proposed. Lava Ridge project's proposed consumption of 118 square miles of farmland is wasteful. People knowledgeable about the Minidoka Memorial express outrage that the project will interfere with the educational value and operations of the facility which is vital to maintaining true and accurate history of our nation. It dishonors those who were incarcerated, some of whom are our family. Consuming this much land in the vicinity is also detrimental to First Nations Communities. For all these reasons, this is not a wise or efficient use of land; therefore, we are adamantly opposed to construction of any extensive wind turbine facility such as Lava Ridge
11187-1	Lynn Takeoka Spence	I had a chance to visit the Minidoka National Historic Site last month. It was my first visit to the incarnation site of my parents and their families. Driving through the area my husband commented that it is desolate place. There were a lot of power lines and some farmhouses visible from the incarceration site which detracted from the visual image of placing people in a desert area that was cut off from society. My parents remember it as being out in nowhere. They had no idea which way a town might be or how far away it was. When they were moved there, the camp was not complete and basic services like water and sewer were not functioning yet. As we walked around, I thought that it would be a detraction to have a wind farm within view of this historic site. It was clear to me that the site is being developed so people can come and get an idea and feel of what our country did to a select group of Americans and legal immigrants. As our country continues to deal with racial discrimination, I believe it is important to use these historic sites as teaching opportunities for the nation. Part of that means recreating an environment that makes that possible to imagine. Since the Minidoka Historic site is being developed for visitors to see and learn about the experience of Japanese Americans and legal Japanese immigrants who had lived on the west coast, I believe a wind farm would take away from that learning opportunity
11192-1	Name Not Provided	The DEIS fails to recognize that the visual impacts from Alternatives B, C, D, and E to Minidoka National Historic Site would constitute major impacts. The Department of Interior is legally responsible to protect Minidoka National Historic Site pursuant to Minidoka's enabling legislation "to protect, preserve, and interpret the resources associated with the Minidoka Relocation Center," the Organic Act, and numerous other laws and executive orders. The Department of the Interior is failing and will ultimately fail in maintaining the trust of the Japanese American community if it does not select Alternative A or an alternative that does not impact Minidoka NHS. Selecting any of the action alternatives will be a blight on the Biden administration, federal government, DOI, BLM, and NPS. It would mean undoing decades of federal laws and executive orders that have worked to demonstrate the fundamental injustice of the incarceration of Japanese Americans during WWII and the protection and preservation of the incarceration sites dedicated to public education and the integrity of the nation. Would the government desecrate other sacred or nationally significant sites for renewable energy? Would it place such wind turbines near Yosemite Valley, Mount Rushmore, or Flight 93? The fact that the DOI seems to be OK with desecrating Minidoka NHS is a clear demonstration that the DOI leadership and the Biden administration are not fulfilling their promises, executive orders, statements, and regulations to ensure environmental justice for minority and disadvantaged communities. There is no mitigation that is acceptable. If an alternative that impacts Minidoka and the Japanese American community is selected, it will go down in history with the names of the leaders (Biden, Haaland, Estenoz, Stone-Manning, Sams, etc.) who approved it as a continued failure of political leadership. Some places and histories are sacred and cannot be compromised, negotiated, or "balanced" with other competing agendas. Don't desecrate Minidoka in the name of renewable energy. The stakes are too high; the benefits of gigawatts do not outweigh the destruction, distrust, and injustice the project would cause.
11194-1	Kimberly Drake	Please do not put this project so close to the historical site.
11195-4	Sandra Callen	The Japanese Internment camp would be desecrated with these turbines.
11197-1	Maria Lorcher	Idaho will continue to loose their identity if historical sites like Minidoka are lost to development. There is plenty of land to swap in and around this project so that the wind farm can co-exist but NOT on the historical site. Manzanar in California has done a great job in creating an auto tour, recreated the bunk houses & entry to the camp and a building to hold artifacts and stories of this historic time in America. Japanese Americans regularly host events at this site and it is important for all Americans to remember this time in history even if it is uncomfortable. Manzanar has the distinction of being part of the US National Park service. As a Federal Agency (BLM), it would benefit the State of Idaho and the citizens of the United States if Minidoka can share the same distinction to be saved for generations to come. Please say "NO" to the Lava Ridge Wind Project on this land.

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11198-3	Lori Wright	I am a third generation Idahoan. My father who is 86 remembers watching trains pass with Japanese people going to Minidoka to be interned. If Lava Ridge Wind Project goes through, the view shed from Minidoka would be altered and therefore our perception of the past. The feeling of isolation that the Japanese encountered is an educational opportunity to learn from our historical mistakes. This opportunity would be removed with Windmills, roads, and dust encroaching and changing the perspective thus eliminating the preservation of impact of Minidoka for future generations to experience and learn from.
11199-2	J Yamamoto, B Yamamoto, D. Miller, S Okamura, T. Robison, M Woods, M. Yamamoto-Howland, R Yamamoto, K Waters, G Watanabe, J Nakanishi, D. Nakanishi, J Naito, P Okamura Sr., W. Nakanishi, N Yamamoto, S. Yamamoto, T Hadway, T. Waters, K Hadway, K Yamamoto, C. Waters, B. Farner, R Yamamoto-Farner, D. Yamamoto	I OPPOSE the Lava Ridge Wind Project and SUPPORT NO ACTION ALTERNATIVE A. I do not see a short term or long term benefit to Idaho as a whole, the area's historical monuments like MINIDOKA, and surrounding habitat and recreation. Idaho is becoming a dumping ground for Energy resources that do not benefit Idahoans. There is an ALREADY ESTABLISHED Turbine Farm in the same area as well as Solar Panels. The view of enormous turbines around MINIDOKA interment camp DISRUPTS visitors sensibilities to an unjust time, forcibly inflicted upon a targeted group of specific ancestry. The extraneous structures DIMINISH the recognition of hardship and injustice FORCED upon Japanese-American Citizens during WWII by removing the personal journey of experiencing the desolate, harsh environment & poor living conditions experienced by those incarcerated. The sight of 740ft Turbines (largest on US soil) would certainly distract visitors and potentially disrupt the immersive experience by becoming a focal point of conversation and attention; dishonoring the painful memories/stories of discrimination, loss and hardship endured by internees.
11203-1	Joan Darby	Lava Ridge should move far away from the Minidoka memorial project. It is the least we can do to respect the American citizens who were placed in detention without warning or reason. They deserve a quiet place of remembrance. Our American government made a whopping big mistake when they incarcerated Japanese American families during WW II. While in Minidoka they improved the land around them, and built as good a life as possible. I admire what they accomplished there in spite of the trauma of expulsion from their homes. Please respect the Japanese Americans by NOT placing a huge windfarm in their back yard.
11209-2	Linda Ando	My name is Linda Ando, Japanese American community member and I am writing in response to the proposed Lave Ridge Wind Project and the impact to the Minidoka National Historic Site. After reviewing the proposed site plans of the 400 wind towers and 14 towers located on the Minidoka Historic Site where the annual Minidoka pilgrimage occurs and sacred grounds of our ancestors and family were incarcerated poses great concern. My concerns relate to the encroachment of the massive wind towers to the Minidoka Historic site where families, community (local, nationally and internationally) and Students gather to learn, share, heal and understand past injustices and walk on sacred sites where the Japanese Americans were detained in desolate environments and conditions. The preservation of the history, actual incarceration sites like Minidoka and to experience the physical site (land carries memory) where trauma of injustices occurred in American history is critical to the healing of the nation. Preserving an unobstructed Minidoka Historic Site is an ethical and historic consideration.
11218-1	Friend of Minidoka	No Action alternative requested. Honor the areas near Minidoka and keep them sacred. In doing so we remind ourselves to avoid repeating past mistakes and making new ones. The First People took care of the land and the land took care of them. Incarcerated Japanese Americans labored over the wasteland and brought forth edible crops and sustained life. Scarring the landscape to harness electricity is going against the grain.
11235-1	Amanda Vail	I oppose this project, although I support clean energy. The Minidoka site is an important part of American history that should be maintained as it currently is. I support the Japanese-Americans who are opposed to this project, as it infringes upon an important part of their history.
11236-1	Michele Thompson	As a Japanese American I strongly oppose this project. Although my mother was born in Japan in 1930 she immigrated and became a citizen after the war. She always felt and passed on to me that to be a citizen you must always acknowledge the errors made by our government and to learn from them. The Minidoka site serves to remind everyone of this horrendous episode when US citizens were imprisoned by their own government and this could happen again. We visit this site to remember this group of brave citizens who endured much, and we hope all citizens, no matter what their race or ethnicity can learn these lessons. Erecting these very intrusive windmills so close seems to trivialize this site, as if our government is once again saying "you don't matter". Please find another site for this project.
11241-1	Ellen Ito	As my family members who were incarcerated at Minidoka age and pass from their earthly life, I feel even more acutely the need for physical, tangible space to keep their legacy and stories alive. I implore you to consider the compounded existing pain, alongside the new harm and loss you will create for the children, grandchildren and great-grandchildren of those incarcerated by erasing this important history. Like incarceration, this action will not exclusively impact the Japanese American community: Everyone suffers when the lives of others are erased. The same optimism that informs the pursuit of cleaner energy sources should also inform the path we take in pursuit of a better future.The site is a symbol of hope that we may all learn from the gross errors of the past, a crucial reminder to everyone that we should never repeat these traumas, This turbine project perpetuates the very action that the site stands in testament and opposition to. Please consider option A, no action.
11242-1	Christine Shigaki	Please do not continue this project that affects the integrity of the Minidoka National Memorial. It is important part of history for all Americans to continue to recognize and learn from our past. Incarceration of innocent Americans should not have happened and we, at this pivoting point, are responsible for protecting this sacred land to memorialize the past and educate current and future generations. Continuing this for profit venture not only perpetuates inequalities that continue to happen, but also supports future inequities. It is important for my (our collective American) children, their generation and future generations to not continue the generational harm. Allowing this project supports and continues the harm that we can collectively arrest. Considering this project, not only will destroy a national landmark, but also erases part of an important past history for all Americans. Especially, for our future generations that can learn from past atrocities by remembering--to not let history repeat itself.
11248-1	Kit Y	Please stop this windmill project as it will destroy a national landmark that is important to preserve as part of US History. Its purpose is to honor and remember our past American ancestors who experienced incarceration wrongfully and had endured so much pain and disruption. These stories need to be passed on to future generations so that we don't forget the scar it has left on generations of Americans.This tangible historical landmark educates and reminds current and future generation of Americans to not repeat the past atrocities. Please do not erase this tragic history!
11250-1	DJ YU	For all Americans, but especially Asian Americans this act to effectively erase the history of interment here at this location is searingly painful. A wrong happened here in American history and to rid the site of this evidence allows a further repeat. For those families affected and all Americans who feel the shame, it is imperative that this site remain for only this action fends off any further revisitation of this horrible history. It is a heritage which should remain forever remain to bear testament as we all need to move forward to acknowledge that this happened. It is still the heaviest burden of intimate cutting pain that many Asian American feel and to leave off or rid this site would constitute further grievance onto a very painful past. Please consider how important this site is to all Americans who need to bear witness to the devastating consequences of internment here at this site forever. Thank you for keeping history alive.
11251-1	Glenda Owen	Please stop plans to allow wind turbines on this historical site.
11253-1	Hugh Kim	This windmill project must be stopped in favor of preserving the Japanese Incarceration camp landmark. We must conserve the site as a reminder to never repeat such an injustice to any group of citizens living peacefully in our beloved country. The site is a significant, living reminder that even in a freedom loving country as the U.S., how misguided, and racist decisions could be made at the highest levels of the offices. As we have witnessed during the pandemic, hatred against Asian Americans is still a reality that we must face. The consequence of erasing such an important, shameful chapter of the U.S. history is to further cement how little Asian Americans are regarded.

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11255-1	Gilbert Hirabayashi	I am absolutely against this project! My grandparents and parents as well other relatives and friends were incarcerated at the Minidoka concentration camp. The site should not be compromised because it is a memorial to the grave injustice suffered by Japanese Americans during an extremely dark period in our history. This site, as well as others like this, must continue to remind us that loyal Americans, regardless of skin color, ethnicity, or culture, must not be corralled and imprisoned without trial or because they looked like the enemy. This site, instead, should be enhanced and expanded to provide more information and transparency about the injustice that happened then and insure it will not happen again. Our children and their children and all others must know what happened to protect themselves and their future. As a retired US Department of Justice employee I am fully aware how the federal government often does business and makes decisions. I appreciate the opportunity to voice my concern and opinion. I also am aware our government can make great strides considering all sources of input and feelings. Sometimes economics, ecology, business, or politics are not the only or best interests for us. What is in our hearts and souls are is what is essential to us all. This small piece of land and history is essential to all Americans.
11257-1	Kalman Fortoloczki	The Minidoka National Historic site is both a memorial and a teaching facility. It is my understanding that the proposed project will significantly impact the Minidoka National Historic site in a number of ways. I have personally visited the site and have a direct connection to those who were incarcerated there and their families. First and foremost any impingement, visual or otherwise, on the site is a defilement, minimizing and trivializing the suffering and trauma experienced by Japanese American resulting from the unjust violation of their civil rights by the US Government. Secondly, the impact of a visit is grounded in experiencing the vastness of the original camp. The magnitude of the crime perpetrated by the US Government cannot be fully appreciated until one stands within the grounds, imagining the empty landscape filled with blocks of barracks housing 15,000 to 20,000 people, each one of which was unlawfully removed from their homes and communities. This impact is critical to the educational mission of the camp which illuminates the effects of racial prejudice and illegal government overreach. For the visitor, the physical space contextualizes the magnitude of the dangers of a government out of control. I would ask that the project managers reconsider their proposal, and respect the social, moral and educational dynamics of the Minidoka National Historic site as it exists today.
11260-1	Hannah (No Last Name Provided)	Please rethink this project and the placement of it. My grandfather and great aunt were one of the many individuals incarcerated in the Minidoka incarceration camp just two miles south of where this project is proposed to be placed. My grandfather had the chance to take a pilgrimage to it in 2019. He passed away in 2020. I have yet to visit the camp because facing my history has been difficult, yet I deeply desire to visit for I want to connect with my grandfather and my community by experiencing it in the way that they did. Placing this project 2 miles north of the sacred site of the Minidoka National Historic Site would destroy the site, and ruin the experience of many elders and members of the Japanese American community for the site and sound of windmills would destroy from the desolate nature of the desert. This desolate aspect was a part of the terrible experience, and what contributed to the emotions and feelings of these individuals being betrayed by their government. It is important for us now to reflect and connect with this space as it was back then, so that we do not forget this dark mark in American history. Installing the project and the windmills in this location would also be a dark mark upon American history for it is an incredibly shameful act upon the Japanese American community by destroying the quiet desolate desert. Disregarding the input of the community would show the lack of respect for the Japanese American community and the desire to preserve a historic heritage site. Do not place this project near the Minidoka National Historic Site. Help us preserve the site so that many generations can come to see the beauty and horror the space, so that many people like me can visit to connect with our community and our relatives.
11263-1	Rae K.	The Lava Ridge Wind Farm should not be sited as currently proposed. The Minidoka site is considered sacred to people of Japanese heritage like me as a memorial to a time when thousands of Japanese Americans were incarcerated because if their race. This includes my father and aunt, both of whom were born here in the US. As much as I support alternative power sources, given the huge expanse of land in the area, creating these wind towers so close to the Minidoka site will destroy the memorial site's silence, desolation and remoteness that was part of my ancestors' experience while there. Incarceration of any Americans based on race alone should never happen again but if we don't preserve these memorials as they were, these seemingly "small" violations into these memorials create a risk that we minimize and potentially rewrite the violation of law and the impact the Japanese incarceration had during that sad time and n history.
11277-1	Jane Slickers	I am opposed to the Lavaridge wind project because of Questionable effect on our aquifer and our water supply Noise from the Blasting The sheer scale of the project and size of the windmills The effect on our wildlife Compromising the Minidoka memorial site
11279-1	Name Not Provided	I hope that this project will be reconsidered. When I was in high school, I asked my father about Minidoka, and his response was, "We just don't want it to happen to you guys (the kids)." The man of few words tried to drive us out there on a family trip many years ago, but was not successful in finding the exact site. He wanted to share with us, but perhaps it was too painful or difficult to do verbally. I know that our family is not alone in this experience---many of the Nisei pressed on with their lives without processing the trauma. I would like myself, my child, and generations to come, to be able to go to Minidoka and get a sense of what it was like to be sent out there as American citizens, to connect with our family and community's history, and to process the injustice...without the presence of large wind turbines! My hope is that a compromise can be worked out. We owe it to these great Americans.
11281-1	Daniel Hwang	The United States government, our government, finally issued a formal apology by then President Ronald Reagan for the wrongful internment of hardworking Japanese-Americans. This national landmark remembering both the formal apology and the wrongful Executive Order 9066 by President Franklin Roosevelt should be preserved. The purpose is to honor and remember the wrongful incarceration a dark chapter in American history. We can do better in America despite the past. We must pass on this story to future generations. This landmark is there to educate current and future generations in hopes of stopping future generations from repeating past atrocities.
11286-1	Robert Spreen	It is bad enough that our country made decisions that made Minidoka necessary. Desecrating this site now makes a statement that it is time to forget, another appalling statement.
11287-1	Katharine Christian	Wind turbines need to be kept outside the footprint of the concentration camp. Ideally there would also be one side that would have unobstructed views so that visitor could better grasp the isolation of those interned there.
11289-1	Midge Carstensen	I am writing in protest to the building of the wind farm near and on the area of the memorial to the Japanese internment camp in Idaho. We have memorials in this country and on this earth for very important reasons - to remember those who died for an important cause, i.e. defending democracy, freedom, etc, and for those who were treated unfairly, unjustly and persecuted by our citizens and our government. That second reason can be a tough one to admit but it's mandatory for preserving history and for healing. I, and many others, ask that this wind farm NOT be built near or on the grounds of this memorial site. Thank you. Sincerely- Midge Carstensen Redmond, WA
11292-1	Name Not Provided	The current DEIS fails to adequately weigh the impacts on the Japanese American community. This desecration of the Minidoka Historical Site and its surrounding should be seen as an unacceptable price to pay for this project. The language BLM uses, describing incarcerees and their descendants as "tourists" shows the racist bias of BLM and lack of community engagement. Alternative A: No Action is the only way forward.
11294-1	Michael Higashi	STOP the Lava Ridge Wind Project The Camp Minidoka grounds and expansive neighboring landscape needs to be preserved for future generations to see and experience. The isolation and bleakness that our ancestors were forced to endure is not to be trivialized or forgotten. A shameful action of our government created this place and Americans suffered.
11296-1	Kellie Wright	I support the "no action alternative" and I feel that it should be the only choice for the Lava Ridge Wind Project.

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		First of call, the Minidoka Historic National Site and other potentially significant historic and cultural sites, including many that have not been properly surveyed, are in the path of the project. I strongly feel that the work has not been done and lacks the appropriate surveys leaving many historical sites vulnerable to destruction without documentation or identification. This project also fails to recognize the importance of the cultural landscape and the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience.
11300-1	Michael Kataoka	I would like to formally state my objection to the proposed Lava Ridge wind farm project on the site of the federally protected World War II Minidoka incarceration camp. While I am a strong proponent of clean energy alternatives, including wind turbines, and in fact am an anti-fossil fuel activist aligned with the Climate Reality Project and the GreenFaith organization, I do not believe Minidoka is an appropriate location for Lava Ridge. I am also the son of two Japanese Americans who were unjustly incarcerated in a camp just like Minidoka, in Rowher, Arkansas. The proposed wind farm would severely block views of the National Historical Park with 400 proposed towers and disturb the solemnity, seclusion and sacred setting of Minidoka that has been preserved for some 80 years. I urge you to protect the Minidoka landscape from intrusive, unnecessary industrialization.
11319-1	Priscilla Wegars	Although I am not of Japanese American ancestry, I am opposed to the Lava Ridge project if any wind turbines can be visible from the Minidoka National Historic Site. This place is an important pilgrimage site for Japanese Americans and others, who deserve to have the viewshed remain as it was when it served as a concentration camp for American citizens of Japanese ancestry and their non-citizen relatives and friends. Calling current-day Japanese American visitors "tourists" rather than survivors or descendants of survivors denigrates their unconstitutional detention.
11320-1	Judy Todd	As a life-long Oregon Resident (minus 4 years in WA) I am well aware of the difficult and onerous treatment our Japanese Citizens and in some cases, early immigrants, received in the 20th Century, mostly due to World War Two. The documented racist , colonial-privileged heavy, and unfair actions, laws and decisions made individually and collectively were misplaced and in retrospect, damagingly inappropriate. This plan at Minidoka continues that egregious tradition by some uninformed or ignorant people in positions of power, unfortunately. Instead, I ask that Option A, No Action, be chosen. Why? Because: The plans for BLM going forward fails to adequately protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience. It also inappropriately identifies Minidoka NHS as for "Tourists and Recreationists." This is a slur and an incredibly ignorant and misleading description. (It sounds a lot like the 'playground' at Hanford Nuclear Site that is also currently up for green-washing/white-washing.) Finally, going forward in the BLM plans also fails to recognize the importance of the cultural landscape and preserve the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience. Thank you for your attention. May the right course be taken, at last, as an example for the reparations in the 21st Century we desperately require.
11328-1	Mark Takiguchi	I am writing in support of Alternative A- No action. The Minidoka National Historic Site is a unique site for education, memory, and healing. I feel strongly that preserving the viewshed is necessary to maintain the site as close to its feel in 1942 when over 13,000 people were incarcerated there, most for multiple years. My own family was incarcerated in Poston, Arizona. I have numerous photographs of my maternal great grandfather, Kametaro, the family patriarch. The shots of him before the war show a vibrant, confident man and community leader while the images of him after the family resettled in Chicago show a broken person, ravaged by stroke and requiring support from his tiny wife to move around. He was removed from our family and subjected to questioning by the FBI and my family said he was never the same after that. I have heard numerous, similar stories from friends and colleagues about the multi-generational trauma of this shameful chapter in our history. Many of us are still coming to terms with the multiple ways this removal of our families from their homes, livelihoods and communities still plays out. This is why I am fighting so hard against the other Alternatives and their disruption of a historical site of conscience. The DEIS is thorough, but what is unintentionally missing is how language and the framing of choices signal a default set of values. For instance, the identification of the Minidoka National Historical Site as for "Tourists and Recreationists" minimizes its main role as a place of healing, reflection, and restoration. Similar to a religious pilgrimage, people undertake these visits to understand and process powerful emotions and moral choices. I also question who gets to decide what is a "moderate" degree of visual change? Would a tiny swastika symbol erected near a Jewish Temple qualify as "moderate" disruption or should the group most harmed by that incursion get to decide the impact of that change? I understand that balancing many different constituencies and competing needs is very hard, but I would hope that human groups that have experienced historical harm would be given additional consideration. When our needs and perspectives are not heard though these processes, it reopens old wounds and undermines our faith in these institutions. Please protect this unique site and honor the pain of those incarcerated and the impact on their descendants. And respect the decades-long efforts that led to the designation of this site as a National Historic Site and its current partnership between NPS and many others. Sincerely Mark Takiguchi Fourth Generation Japanese American
11335-1	Jan Ronald Boles	April 18, 2023 In Re: Proposed Lava Ridge Wind Project I am a member, an ally, of the Friends of Minidoka. I have resided and worked in Idaho more than 60 years, all that time a friend and colleague of Japanese Americans whose lives were directly impacted by Executive Order 9066. I have come to feel a deep emotional bond with those dear people in my life. As a member/ally of FOM, I endorse and second their position in opposition to the proposed Lava Ridge Wind Project: "No action." As an American who supports the drive for alternative sources of energy, including hydro, solar, and wind, I say "No action" to the proposed Lava Ridge Wind Project. As a professional photographer/visual artist who has been documenting the Minidoka NHS since the early 2000s, when I visit the site (my wife and I were last there on April 15, 2023) I visit a shrine. I visit a hallowed memorial to the more than 9,000 Japanese Americans incarcerated there during World War II. Today I visualize those 340 proposed wind towers that were diagrammed in the BLM DEIS, clearly delineated on 114 degrees of arc, nearly one third of the horizon, juxtaposed behind key components of the NHS. Those proposed towers would dishonor the purpose and spirit of the Minidoka National Historic Site. For these reasons I say please, take "No action." Jan Ronald Boles Sunny Slope, Idaho
11338-1	Stephanie Ikeda	I am writing in criticism of the Lava Ridge DEIS and requesting the No Action option. This proposal ignores the extreme impairment of resources that the National Park Service have invested in the Minidoka National Historic Site and the significance to the taxpaying citizens who regularly utilize its historic resources. Furthermore, the DEIS inappropriately identifies Minidoka NHS as a site for tourism and recreation which reflects ignorance of the history of the location and its impacts. The DEIS also fails to recognize the importance of the cultural landscape and preserve the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its educational experience. The size and scope of the project impinges on the viewshed of the site which is a crucial component of the historic preservation component of Minidoka NHS. The Bureau of Land Management also failed to notify the impacted population in Idaho and throughout the United States before the Notice of Intent was posted on August 20, 2021. The Bureau has shown a lack of knowledge or refusal to adequately address the cultural properties of the National Historic Site and that the proposed changes will negatively impact citizens not only in Idaho but across the country, as people formerly incarcerated at the National Historic Site and their descendants have since dispersed throughout the country.

Comment ID	Sender	Public Comment
11348-1	Karen Maeda Allman	I am writing to register my objection to the proposed alterations to Lava Ridge and the Minidoka site. I have visited the Minidoka Historic Site and believe that the proposed wind farm and other structural changes will permanently harm a vital historic site. We should be building on the understanding of the experiences of those wrongly incarcerated during World War II, not destroying this history and placing this disruptive project on the historic site, discouraging visitors to what many people nationally consider an important, sacred site.
11364-1	Bille Arellano	To: Bureau of Land Management Officials. Hello, my name is Billie Arellano and I was moved to contact you to ask you to reconsider permitting a privately owned company based in New York to develop the Lava Ridge Wind Project in Southern Idaho. This project would forever change the landscape that is the site of the Minidoka War Relocation Center that Japanese Americans and Alaskan Americans were unjustly sent to in 1942. This site is located in remote, isolated area that experienced extreme climate temperatures that those human beings had to endure. There is still much wildlife in that area and I am concerned about the negative impact building the 400 foot wind turbines and the roads would impact those creatures on the ground, in ponds and the birds. Growing up in Southern California and having lived in the Pacific Northwest for 33 yrs I have known several people who had grandparents, parents, aunts/uncles, cousins who were incarcerated in that camp as well as one of the camps in California. When they trusted me enough to share these facts and their stories there was an intense feeling of shame, anger, hurt, loss. There was also a strong feeling of anger and loss over being ripped away from their homes, neighbors, friends and having to literally walk away from businesses that those people built and developed from the ground up. In our contemporary life this is called Post-Traumatic Stress Disorder. I have not yet been able to visit this sacred space but I am planning on making that site a pilgrimage. I liken it to my trip to Dachau,Germany concentration camp I took summer of 1969 when I graduated. As we pulled up in the bus I could "feel" a chill run through me and still feel that when I recall that moment. As I stood inside the camp I felt such a deep sense of sadness and grief. I felt the solemness and sacredness of that place and me standing there. Minidoka is one of those place and I ask you:PLEASE DO NOT PERMIT THE WIND TURBINES at MINIDOKA. Thank you.
11365-1	Alexandra Arai-Cauley	Hello, I would like to respectfully lodge my opposition to this project as it is currently designated. Its proximity to the Minidoka Historical Site and former site of incarceration of Japanese-Americans causes very great concern for me. I believe the impact of the turbines and related infrastructure, while intended to promote environmental sustainability, will instead aid in the destruction of a site that is incredibly important to the Japanese-American community. These sites of incarceration are not merely museums or places to visit; they are physical markers and "proof" of the suffering endured there that continues to affect our community. The fact that other sites have been similarly destroyed or erased by similar projects deemed for the public good makes it very painful for survivors and their descendants. Are we not members of the public? It is hard for me to accept that there is no other place for these turbines to go. If they are being placed in a remote area to avoid disturbing local communities, please consider that the Minidoka site is not empty; it is filled with the pain of our community and has also become a site of healing for those who return and maintain it. I strongly urge you to reconsider this project. Please do not forget us again.
11374-1	Tara Fisher	We are requesting no action be taken on behalf of Friends of Minidoka. This action would cause further harm to communities the United States has historically and is attempting to currently marginalize. The land is and site is meant for remembrance, let us not forget the actions we (the United States government and therefore its people) took towards Japanese Americans and this project would cause disruption to that memory and the site itself.
11376-1	M Fisher	I strongly believe the Lava Ridge DEIS V1 should not come to fruition. I think the land where and around Menodoka sits, needs to remain unscathed, as a tribute to the Japanese who were unfairly forced to live there during World War 2. We need to honor their wishes to not desecrate this area with windmills.
11377-1	Roy Wesley	I object to the Lava Ridge wind farm development on Minidoka Land, a designated National Monument. I am a survivor of incarceration at Minidoka (1942-1944) and deem the designated land to be historic and should be left for visitors to contemplate the actions and lives that suffered there in silence and with a sense of the original landscape. The presence of the wind farm is jarring and disturbing to this type of contemplation. The Wind Farm may continue its expansive set up beyond the visual borders of Minidoka. There appears to be plenty of space for it. Thank you for your consideration, Roy Wesley (born Uyesugi) named changed by my Japanese American Father, 1944.
11378-1	Susan Shinoda	My father, uncle, grandmother, and great grandmother were interned at Minidoka and my great grandmother died her first winter there, unaccustomed to the harsh conditions. Family of my generation have all made the pilgrimage to learn and better understand our heritage and circumstances from the past. The Lava Ridge Wind Project adjacent to the Minidoka National Historic site would be a tragedy as the wind farm would tower over the site. Experiencing the feeling of isolation in a barren desert would be lost. Please take No Action to not allow the Lava Ridge Wind Project adjacent to the Minidoka National Historic site.
11381-1	Thomas Koto; Boise Valley Japanese American Citizens League (JACL)	To Whom It May Concern: My name is Tom Koto, a descendant of a Japanese and Japanese American family incarcerated at Minidoka during WWII. I am a third generation Idahoan, born in Jerome, lived in Shoshone and moved to Twin Falls, Idaho when I was 2. My Mother's side of the family were taken from their farm in Salem Oregon and transported to Tule Lake, CA and eventually to Minidoka where they spent the rest of their time imprisoned, in the desolate desert of SE Idaho. I am opposed to the proposed Lava Ridge wind project for many reasons, mainly the direct impact on the view shed of Minidoka. This would have a negative impact on the historical site. As an educational facility, the desolate effect would be lost on the visual of hundreds of wind turbines. I also oppose for the direct and indirect impact of the project to land users, aviation and migratory birds and animals. When I went on the BLM tour last Summer, at the final stop, a BLM Biologist presented and stated there is an acceptable mortality rate for migratory birds and when asked what happens if the number breaches the maximum threshold, he stated LS Power would be "fined." LS power has consistently stated they do not have any contracts in place yet. They wouldn't be spending so much time and money if they didn't already have customers. Which we understand to be Las Vegas and S. CA. Magic Valley Power representative stated in an Idaho Senate committee hearing "this project would be good for Idaho and Idahoans." I do not see how that can be a true statement, with power shipped out-of-state, labor primarily CA union workers, and profits going to the East coast, will not benefit Idahoans or Idaho, as was stated. This project is not supported by our Governor, Lt. Governor, Federal Delegation, State Government (Both House and Senate), local government, and many thousands of Idahoans in the Magic Valley. Therefore, I support Alternative A, "No Action," and support the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC).
11385-1	Ron Abramovich	Thanks for the opportunity to comment. We all support renewable energy projects; however, the size of the proposed windmills and magnitude of the Lava Ridge Wind Project is too large in this fragile high desert environment in south central Idaho. A few items to address follow: 1. Any impacts to the Snake River Plain Aquifer that flows beneath this unique area. The aquifer is very complex with rivers flowing underground from the Lost River basins to the Snake River. Any changes in the hydraulics would be challenging to determine but should be addressed before tons of concrete is used in the fragile volcanic area. 2. Another item are wolves that use this area. March 2016 I was traveling in this area and saw three wolves coming down the drainage to drink water from the canal. I was driving along the canal from the Minadoka National Historical Site to Mile Post 31 Recharge Site. They saw me and I saw them. The wolves took a quick drink, turned and headed back north. I was not able to get a picture. 3. The Minadoka National Historical Site is also a special area for so many people and their families and should not be impacted visually by these huge windmills, sound from them or greater dust levels from disturbed areas. 4. Best practices should be used to reduce raptor impacts. February 2023 along Highway 20, I saw one of the biggest Golden Eagles I have ever seen. I'm sure raptors use the Lava Ridge area too. Thank you for the opportunity to comment. If you need anything else, feel free to contact me. Ron Abramovich Retired Idaho Water Supply Specialist 208-908-8280

Comment ID	Sender	Public Comment
11388-1	Michael Tanaka	I am writing to express my strong opposition to the Lava Ridge Energy wind project and endorse Alternative A. While I understand the importance of renewable energy, this project poses a significant threat to culturally sensitive sites that must be protected. Renewable energy projects should be sited at areas that don't pose these problems. The Lava Ridge project should be delayed in order to allow careful consideration of other, potential options. Of particular concern is the impact of the project on the Minidoka National Historic Site. This site is of immense cultural significance to Japanese Americans who were unjustly interned there during World War II. The site serves as a poignant reminder of a dark period in our history, and it is essential that it be protected for future generations. My father and his family were incarcerated at Minidoka, making the present site especially meaningful to me. Even though diminished, Alternatives C and E identify potential auditory and visual impacts from the project. They will desecrate the almost sacred communion one experiences at Minidoka. The proposed mitigation measures fall short of ensuring that the essential character of the Minidoka site remains undiminished. In addition, the project would also have a significant impact on culturally sensitive Native American sites in the area. It is imperative that we respect the sovereignty and cultural heritage of Native American communities and work to protect these sites from development that could cause irreparable damage. I urge BLM to fulfill its important role in managing and protecting public lands to deny approval for this project given its detrimental impact on the Minidoka site. Thank you for your consideration. Michael Tanaka
11395-1	Gordon Sakaue	I would like to submit a comment as an interested member of the public. My mother was confined in Colorado, my father in Arkansas, and one of my pursuits after retiring from a math classroom has been to visit the sites of incarceration from 1942-45. I have been fortunate to visit Minidoka twice -- once on my own and walking the path with informative signposts, and once as part of a pilgrimage, with speakers, panels, and -- that particular year -- the dedication of its National Park Service visitor center. At some of the sites, the terrain remains stark and windblown: Topaz in Utah and Amache in Colorado. (A former original barracks and a replica exist at the latter). Manzanar has a refurbished social hall, now the visitor center, and multiple barracks replicas. Heart Mountain has a barracks replica serving as a meeting place, and cultivated fields on the acreage of the actual camp footprint; in Arkansas, private owners are cultivating fields where the Rohwer and Jerome camps were located. I have not visited the Gila River site on reservation land; at the three Poston camps (on on the Colorado River reservation), there has been some infrastructure development, such as a modern elementary school. The fate of the Tule Lake site is under discussion: uniquely, part of the camp footprint lies on the local airfield. At none of these other former WRA incarceration sites is there such a dominating and literally overshadowing presence as would emerge at Lava Ridge. It wasn't easy for me to visualize such a tower, but this proved useful: somewhere between the Statue of Liberty (300 feet) and Washington Monument (500 before if tapers). And there could be as many as 400 of these wind towers! Projected images give us a sense of what might be within view while walking the grounds of Minidoka -- a wall or forest of wind turbines. With towers filling the fields of view, it would be difficult to try to walk in the footsteps of those confinees, experiencing some of the mental outlook shaped by bleak vistas, isolation, and weather extremes. Reading some of the coverage in southern Idaho, there are ecosystem and environmental impacts and consequences as well -- habitat and watersheds drastically altered, with an potential recovery lasting years beyond the expected life span of the generation of power. Even more discouragingly, it's not as if local residents would receive any benefits -- the recipients of the power are residents of Nevada and California. Finally, it seems inconceivable that government by the people and for the people could approve use of public lands in Idaho -- with such wide-ranging and large scale consequences -- for other communities hundreds of miles removed. If a picture is worth a thousand words, what might the value be of a sweeping landscape immersing us in the long ago yet not so distant past? The remains of an original root cellar (let us hope soon to be restored) silently punctuates "Never Again
11397-1	Mary Jussel	Thank you for taking my comment. I am quite concerned about this location diminishing the somber, reflective and interactive nature of the Minidoka Site. Please do not put it here. There must be better options.
11398-1	John Pelonio	I suggest "no project" due to potential impacts on nearby cultural sites.
11401-1	Name Not Provided	The proposed Lava Ridge project will be visually and emotionally disruptive to experiences at Minidoka National Historic Site. The land must be protected so that we remember this shameful part of our American history. I request the "No Action" alternative.
11409-1	Paula Fujiwara	I am writing concerning the Lava Ridge Wind Energy Project. I am a third-generation Japanese American (JA) whose grandparents, parents, aunts, uncles, and family friends were incarcerated in several of the WRA concentration camps (Tule Lake, Amache, Rohswer/Jerome, Gila River). I had the privilege of visiting the Minidoka Concentration Camp site in the summer of 2021, even though the country was in the middle of the COVID-19 pandemic. A fellow Japanese American childhood friend and I have embarked on pilgrimages to incarceration sites to honor our families and mourn, reflect and attempt to heal personal and collective trauma. When we arrived at Minidoka, we visualized how the inmates stepped off the bus with only what they could carry. The day was hot, windy and shade less - was it the same for them? Walking the land that day, with the sun beating on our heads, we felt the desolation of the landscape, so remote and isolated, and now so sacred to our history. The Lava Ridge Wind Energy Project will involve construction of wind turbines within the sightline of the Minidoka Historic Site. The expansive panorama of the night skies would be affected by the light sources of the project. To plant these turbines in such close proximity to, and within the day and night view shed of the Minidoka Historic Site would severely affect the immersive experience of today's visitors as they attempt to truly "feel" the lived reality of the inmates. In summary, this is not just a story for and of Japanese Americans; it is a shameful piece of history that all Americans need to learn about and experience without the disruptive presence of the wind turbines on the visual integrity of this land. This project should not be built in the visible proximity of the Minidoka Historic Site.
11412-1	Sam Zalutsky	I am vehemently opposed to the desecration of a sacred place to Japanese-Americans and all Americans, a spot which is essential to protect as it shines a light on the history of this country. The wind farms proposed should be placed elsewhere and this site should be protected from all development. A historical monument to Japanese-American internment should not be forced to compete with our essential action on climate change. It's disrespectful and harmful. Thank you
11416-1	Maggie Tokuda-Hall, Marilyn Tokuda, Wendy Tokuda, Ann Fujii-Lindwall, Ryan Chin, Mikka Tokuda-Hall	I am writing on behalf of my family to support the "No Action" option for the proposed Lava Ridge Project. Ten members of my family including my parents, my brother, four grandparents, aunts and uncles were incarcerated at the Minidoka Internment Camp during WWII. Both sides of my family lost everything they had. Except for my grandparents, the rest were American citizens. For that reason, Minidoka is hallowed ground for me. Their imprisonment there shaped not only their lives, but all of my siblings and myself who were to come after. I visit Minidoka as a pilgrimage not as a tourist destination. There's a reason Minidoka was constructed in the remote desert. It was to isolate the Japanese and prevent us from spying. The desolation and dusty winds were an integral part of this prison experience. To build rows and rows of wind towers taller than the Seattle Space Needle as the backdrop to Minidoka would minimize the impact of the memorial and it's significant. To me, this feels like an insult. Consider these towering windmills, the sheer numbers of them and then imagine our historical site in front of them. The whole experience of Minidoka would be destroyed. The view of the towers and the extensive land they would take would turn our monument into a postage stamp. it would turn our history into a small spot next to a wind farm. Wind farm first, monument second, if that... The unconstitutional nature of the evacuation based solely on race was so egregious that the laws permitting it were overturned, and the U.S. Government eventually apologized and paid survivors redress. That makes this site a historically significant national monument. It is important that it be preserved as it was, so we will never repeat this mistake. I am an environmentalist, but I feel the Interior Dept should find another location. It's not just the view. It's history.
11417-1	J Pray	The porposed Lava Ridge project will impact quite negatively on the history and meaning of Minidoka. The poposed wind farm can--and should--be relocated to avoid dmaging this important and sacred site.
11429-4	Felicia Poteet	Another consideration is preserving the Minidoka National Historic Site (aka Camp Hunt). This is a site of deep local and national historical significance that I have taken my own kids to visit and learn the lessons of the Japanese-American internment. Please say NO to Lava Ridge!
11430-1	Trisha Copeland	By placing the wind farm at the proposed site is erasing US History. No one should forget that Americans were imprisoned because of their heritage.

Comment ID	Sender	Public Comment
11432-1	Alison (No Last Name Provided)	I am a high school photography teacher in Hawaii and I am urgently requesting that there be NO ACTION taken in developing the lands adjoining Minidoka Historic Site for the Lava Ridge Wind Project. The extensive alteration of the natural landscape and the desecration of the view from Minidoka would add more hurt on top of an already painful chapter of our past. My mother and her extended family were all incarcerated at Minidoka. As a young adult, I learned about how their constitutional rights were violated as well as the extreme hardships they faced (familial, social, physical, financial, emotional) for not only the three years they were in the camp, but for many years and even generations after the war. I applied for a sabbatical from teaching three years ago and one of my goals is to continue working on a series of photographic books about my family's story in Minidoka. Although my project was twice delayed due to Covid, I now have a flight booked in July of this year to see Minidoka for the first time. My aunt, uncle and cousins are joining me to also experience the camps we've heard bits and pieces about from family members. Unfortunately, my mother who was born while her family was in the assembly center at Puyallup and then lived in Minidoka for the first three years of her life is not healthy enough to travel with us to see the camp. Though this is a big disappointment, the goal of photographing Minidoka and researching my family history has given me purpose as an artist, a teacher and a descendent. Although I've always been interested in seeing Minidoka, it wasn't until I met NY based photographer Stan Honda, who has photographed many of the country's incarceration camps, and later Hanako Wakatsuki-Chong, the former chief of interpretation and education at Minidoka, that I realized how much I needed to see the site for myself. Stan's majestic photos of Minidoka would not be the same with rows and rows of wind turbines visible on the horizon. Now that we have a better perspective of this historical tragedy, it is distressing to the Japanese American community that the BLM is considering allowing unrelated, yet highly visible structures to be built in this sacred area. The BLM impact statement referred to visitors as 'tourists and recreationalists,' which is insensitive and insulting to the Japanese American community and its allies. I believe that most people who visit Minidoka are traveling thousands of miles out of their way to honor their ancestors and connect to their past. A trip to Minidoka is well off the beaten path and requires money and planning. Most surviving Sansei (third generation Japanese Americans) like my mother, are in their 80's and are definitely not casual tourists. Now there are fourth, fifth and sixth generation Japanese Americans who are continuing to learn about their heritage. Thanks to the wealth of information now available on sites like Densho and Friends of Minidoka, we can find photos, documents and stories since the majority of survivors are very old or deceased. We can connect to a much bigger nationwide community and share our histories with each other. That being said, in our post-Covid world, more survivors and descendants will be making pilgrimages to Minidoka and other incarceration sites in person rather than relying solely on online resources. As a photographic artist, documenting this historical place and finding the beauty in sadness and desolation is my goal and I am looking forward to my trip in July. Still, I can't help but worry that if these enormous wind turbines are built, my children and my grandchildren will not be able to experience the camp the same way that I will. My grandmother used to talk about the wind blowing dust everywhere, including through the cracks in the barracks walls and floors. It would be dismaying and ironic to see that very wind harnessed now, when the National Park Service has done so much to reclaim the Minidoka Historic Site, building a visitor center, reconstructing barracks, preserving the guard tower and root cellar and helping visitors to really feel what it was like. Whether the visitor is a descendant with deep personal connections or someone who was unaware of the severity of the situation and can learn from this country's mistakes, everyone who comes to Minidoka deserves to see it in this preserved state that allows for reflection. Please honor those who were unjustly incarcerated, their descendants and those who want to learn more about it by not proceeding with any construction of the proposed Lava Ridge Wind Project. Thank you for your consideration.
11437-1	Bill Tashima	As a third generation Japanese American, and more importantly, as an American citizen who loves our country and values the struggles and lessons that our country endures as we strive to be a more perfect union, I request that the Bureau of Land Management adopt a "no action"" alternative to the current Lava Ridge Project proposals. I am a progressive citizen. I believe in sustainable energy. In general, wind farms offer a eco-friendly source of energy. Equally, I am an American who values our treasured monuments and National Park areas as priceless legacies that need to be preserved and passed down to future generations. I have been to Minidoka at least eight times since 2002. I go to Minidoka as I would to my parents cemetery. I view each visit to Minidoka as a way to honor my parents and grandparents who were incarcerated in this WWII camps, having lost their homes, property, freedom, liberties, and personal dignity. I view each visit as a reaffirmation of the work and efforts needed to protect the fragility of American civil liberties in times of racism, hysteria, and lack of government leadership. I am insulted to have my visit to these sacred sites views as a "tourist site." Tourist to Minidoka? These are the places where dreams were destroyed. Where people were born and where people died. In spite of all that America did to betray Japanese Americans, more Japanese Americans volunteered to service in the American military than from any other camps. Minidoka, as well as all places of confinement for Americans citizens due to race in WWII, is a sacred place. Hallowed ground, consecrated by the blood, tears, and bodies of American citizens of Japanese ancestry. I am appalled and again insulted that huge wind towers, taller than the Space Needle, will abut Minidoka. Where is cultural sensitivity in making these decision. Where is common decency and common sense? Would BLM permit wind turbines at Gettysburg or Arlington? Has BLM marginalized Japanese American history so much that BLM will sacrifice that many to be one of the biggest shameful moments in American history. I believe there are alternatives. I believe we can have sustainable energy and still honor Japanese American confinement sites. For these reasons, I call for no action on current proposals for Lava Ridge.
11448-1	Nicole Lichtenberg	The unlawful incarceration of Japanese American citizens at Minidoka during WWII is one of the most shameful parts of Idaho history, and it is a part too often skimmed over or skipped entirely. The indignity and desolation the incarcerees faced, as well as the resilience they showed in enduring this terrible injustice, can be difficult to imagine. Only by preserving this history in a manner that visibly demonstrates the isolation and hardship faced by the Americans who were illegally held at Minidoka can we carry this history forward so as to never repeat it again. Any construction project, no matter the type or purpose, that interrupted the landscape and impeded the visual experience would have a detrimental impact on the site's ability to teach the public about the experiences of the incarcerees. Approving or recommending or even failing to oppose a construction project that impacts the sightlines of Minidoka is an unconscionable choice to facilitate the erasure of this difficult, painful, and integral part of our state and our nation's history.
11449-1	C. Kanako Kashima; Minidoka Pilgrimage Planning Committee	The Bureau of Land Management MUST NOT allow Lava Ridge Wind Project to commence within the viewshed of the National Park Service Minidoka Historical Site. The ONLY alternative is A - no action! The development, infrastructure, noise and lights that would be caused by these wind turbines would grossly minimize and - defile this sacred, hallowed ground of those unjustly incarcerated and their descendants. The site is a monument for those who were forced to live there and their descendants. The US government chose to imprison these innocent people in a desert setting, forcing their removal from their homes and businesses with very little notification. This site is to be preserved as is - no development within the viewshed. I am a descendant of Minidoka incarcerees. The first time I visited the site in 2011, I felt the presence of those who were forced to live in the barren, desolate area. The trauma inflicted on my grandfather was so severe, he refused to talk about it with anyone. He started to open up about it with my husband, who helped him get his records from the National Archives. Even then, he never talked about what he went through emotionally. Looking over the records we received, I can only imagine what he went through. I never understood the trauma my grandfather went through at Minidoka, until I took a course at the University of Washington. It was eye-opening, and made me want to learn more about what happened, as this was part of a dark chapter in American history. It was at this point I realized that very little was being taught about the Japanese American incarceration. Although I was born after the war, the stories I have heard from several pilgrimages are carried in my heart. Reading my grandfather's records, I could only imagine what had transpired during the lonely years without his family. Some were funny stories, others were painful. The Minidoka Site is a testament to the desolate conditions that those who were incarcerated had to endure. The BLM must not and cannot minimize the historical importance of Minidoka. In my opinion, it is a slap in the face for everyone, if these wind project gets underway at this site. You cannot put these wind turbines on such sacred ground. I have gone on the Minidoka Pilgrimage every year since 2011 until the pandemic hit. Every year, I shed tears of sadness for what our ancestors went through. Listening to the survivors talk about their harsh living conditions was very heart wrenching. Those who were young, made the most of it, as did the adults under those harsh conditions. The Minidoka Historical Site is also an educational site. To preserve the integrity and sacredness is paramount to educate all people - many who never knew about the incarceration of the Japanese Americans. The educational opportunity is to help bring the pilgrimage experience to another level of focused awareness, healing, heart and reflection. It is of vital importance of sharing and carrying on the legacy of the many stories that are shared from one generation to another so that what has happened will not be forgotten. This is who we are and what we have become - due to the sacrifice of our parents, grandparents and other family members who went through this experience of being put into a concentration camp during WWII. Stories of happiness, sadness, bitter sweetness, pain, and suffering - all make up the experience of our parents, grandparents and even great-grandparents. The importance of keeping the site alive and undeveloped for future generations is vital so that such injustices will not occur again.

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		Putting up the Lava Ridge Wind Project here grossly minimizes historical importance of this place. For many, the intergenerational trauma that has been passed on, will finally feel a weight lift off of their shoulder just by attending the pilgrimage - that this was the place where Japanese Americans were unjustly incarcerated so many years ago, that there might be some closure, a feeling of release and finally some peace. I urge you to please consider the educational, emotional and historical value of preserving Minidoka as is, and not let the Lava Ridge Wind Project to commence.
11450-1	Esther Poirier	I am writing in strong opposition to the Lava Ridge Wind Project. The simple fact that land so close to the Minidoka National Historic Site is even being considered for such a project shows how incredibly important it is for this project not to move forward. So many people today have no idea of the heartbreaking injustice suffered by Japanese Americans and their families from 1942-1945. They have no idea of the lasting impact of this travesty. The site is a powerful witness to history that must not be forgotten. Following Executive Order 9066, over 120,000 individuals were forcibly removed from their homes and incarcerated around the country in what were euphemistically called "camps" or "relocation centers." I can easily imagine, given the wording in the draft Environmental Impact Statement that refers to those who visit Minidoka as "tourists and recreationalists", that the people who drew up this plan had no idea of the depth of meaning that comes to those who are able to visit this historical site and commemorate all whose lives were forever changed by the unjust hardship, indignity and loss they (and future generations) suffered. Recently, I was blessed to join in a pilgrimage to Israel and Palestine where one of the most profound experiences was simply sitting in silence in the Judean desert wilderness. I have also just returned from a Lenten border pilgrimage in the Tucson sector of the Sonoran Desert. It's inconceivable that a wind farm would be built adjacent to the Saguaro National Park, as everyone would understand how it would detract from the uniqueness of the land and the experience of being there. It should be even more inconceivable that such a wind farm could be built near the Minidoka National Historic Site. Government leaders speak of a commitment to environmental justice and a desire to advance racial equity. It is time to take a stand, not against renewable energy which is essential, but against placing such private infrastructure where the impact is one of dishonor and devastation on those who already experience racism and a history of oppression. The Minidoka National Historic Site is sacred land. I hope one day to participate in a pilgrimage there, and I am certain that the Lava Ridge Wind Project on adjacent land would feel like a desecration. To be in that space, standing in the expanse and isolation of field and mountain view, gives opportunity for a holy connection to all who were forced to live there. The site serves as motivation to fight current racism and injustices - a motivation that is vitally important to our country today. It also serves as a place of healing and education - both of which are important values to me as an Episcopal priest and a former middle school teacher in the Pacific Northwest. I participated in a "virtual on-line pilgrimage" to Minidoka during the summer of 2020, which included a National Park Service project where we received seeds and grew native grasses which we mailed back to be planted at Minidoka. It was a personal and meaningful way to honor dear friends of mine who were incarcerated there. It was a way to care for the site. To have hundreds of wind turbines within the viewshed of this area would totally ruin the experience that so many of us desire to respect and commemorate this site. Please say no to this project. Thank you.
11451-1	Melna Skillingstead	I am Japanese American. I was not in the Minidoka Concentration Camp but I have read various accounts about the hardships my Dad and his extended family experienced in there. I have visited the area twice where my grandma, 62, shared a tarpapered room with my dad, 41, and my uncle, 39. In adjacent buildings were eight aunts, four uncles and nine cousins ages 0-9 years old. (one was two months old and another was born there). I feel sad that my cousin felt ashamed until he was 70 years old that he was born in prison - he turned 80 this year). Why the US government felt threatened by children ages 0-9 is a mystery to me. I think the government committed a crime by imprisoning all of them but especially the children. They suffered the bitter cold, the scorching sun, the lack of privacy and the harsh weather in outdoor mess hall lines just to eat their meals. Some of my school aged cousins had to repeat a grade from inadequate schooling while in 'camp'. My heart hurts for my cousin's experiences. My cousins who are now in their 80's still remember Minidoka. They have shared their stories in elementary to college classrooms on the east and west coasts. They've appeared in films, books, TV news stories, photos (National Archives), a survivor panel webinar (Friends of Minidoka), a museum (Washington State Historical Museum and more to educate future generations about this sad time in Japanese American history. Our extended family will continue to know about our relative's experiences in Minidoka from the stories contained in our two family books. Our descendants may visit Minidoka where it all happened. In 2020 I was in Jerome, ID which is about 15 miles from the site. It was April but the temperature that morning was 29 degrees and the 19 mph wind was a bone chilling. I was cold in my down jacket just going to get something from the car. The wind was so strong the door blew closed. Once I was back in the hotel room I realized that my family had suffered through similar weather with inadequate clothing. I imagined them standing outside in a wind such as that waiting to go into the mess hall for their breakfast. It still brings tears. I was struck by the emptiness and isolation of the area during my two visits to the site in 2008 and 2016. When future generations visit the site I hope they are able to see and experience the same desolate, lonely place where their ancestors spent 2-3 years of their lives behind barbed wire. Minidoka is a symbol of injustice. It is also sacred ground which honors our family and all the people of Japanese descent who were incarcerated there. Please respect their memory. Please do not locate the Lava Ridge wind farm in its backyard or visually impact the experience of future visitors to the Minidoka National Historic Site. Thank you.
11452-1	Name Not Provided	The Lava Ridge project while intended to move more renewable energy sources forward does so while carelessly trampling on the Japanese American and indigenous American history. To move ahead as planned would be to destroy a critical American memory for the sake of speed and lack of due diligence to marginalized communities. No on this location.
11453-1	Christian Chesley, Margaret A Chesley	Please honor the lives disrupted during the unconstitutional incarceration of Japanese Americans during World War II by keeping the boundaries of the Minidoka, Idaho camp intact with no installation of windmills.
11454-1	Andrew Abo	My mother was incarcerated at Minidoka during World War II. It had a traumatic effect on her and her family long after the war. The Minidoka National Historic Monument has become a place of healing and community for my mother. The establishment of the National Historic Monument by the National Park Service is a meaningful and appreciated recognition of the wrongs that were made and a show of commitment to avoiding similar wrongs in the future. The proposed Lava Ridge Wind Project has caused my mother much distress. First, there's the visual impact of the turbines and transmission lines that diminish the experience of returning to Minidoka. Second, there's a sense of disrespect that is painful. For these reasons, Alternative A: No action is the only acceptable choice to my mother. I hope the BLM can take into account the re-injury this project will cause to those who were incarcerated at Minidoka.
11456-1	Chad Yoneda	My family and I visited Minidoka National Historic Site on June 6, 2021. We visited the visitor center, talked with the park rangers, and walked the grounds of this important site, a legacy of racial incarceration and concentration camps for Americans of Japanese descent. It is a haunting place, filled with memories of exclusion, loss, and betrayal of mostly American citizens who just happened to look like what was at the time the enemy. As a Japanese American, it is a painful history to know that so many of us were forcibly detained and excluded here. Yet it is absolutely necessary to remember and honor this racist past, with the fervent hope that this will never happen again. For this reason, I find it absolutely appalling that an enormous wind farm is proposed within sight of Minidoka National Historic Site. It would forever blight and destroy the character of Minidoka. Much has already been lost. Extensive sections of land and buildings that were part of Minidoka racial incarceration camp have already been sold off and severed from the historic site. It is enormously disrespectful for Minidoka National Historic Site to put a wind farm on Lava Ridge with wind turbines that are 740 feet tall. The turbines would be more than twice the height of the Statue of Liberty, and nearly 200 feet taller than the Washington Monument!

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		Such 740-foot turbines would forever mar the skyline of Minidoka, and detract from the solemn reflection and consideration that Minidoka deserves for its remote rural location. No National Historic Site deserves such desecration and Minidoka should be no exception. The Japanese American incarcerees at Minidoka were betrayed by their own government, not for any cause or action they had done. To allow huge 740-foot wind turbines in proximity and sight of Minidoka would be the equivalent of betraying those Japanese Americans again by signaling that their wartime betrayal by the U.S. and loss are not being remembered nor respected. I strongly urge the rejection of Lava Ridge Wind Farm and any future attempt to place wind turbines within sight of Minidoka National Historic Site. Please support the sacred memory and respect for Minidoka National Historic Site.
11459-1	Joel Kikuchi	It is with utmost sincerity that I must express outrage and sadness that a for profit corporate entity could set up a windfarm on a sacred place for myself and my community. The disregard for my heritage and ancestors by this proposed project is insulting. I demand that this unwarranted, desecrating maneuver be stopped.
11460-1	Elissa Dingus	I am writing to express my strong opposition to the proposed Lava Ridge Wind Project by Magic Valley Energy and encourage the selection of Alternative A - No Action. The project would install up to 400 wind turbines on Bureau of Land Management property adjacent to Minidoka National Historic Site, including the potential for several turbines to be on the historic footprint of the camp. This would have a major negative environmental and cultural impact on the area, as well as a direct threat to the historical, natural, and cultural resources of Minidoka National Historic Site and the surrounding area. The proposed project would involve a significant number of new installations, including up to seven new substations, 381 miles of access roads, 47 miles of temporary crane walk paths, and more. The turbines may also have a maximum height of up to 740 feet, which would be a significant visual intrusion on the landscape and detract from the beauty of the area. The footprint of the project would expand across a space larger than the city limits of Seattle, Washington - it's incomprehensibly massive. The power generated would also not even be for Idaho residents and would be shipped to California. The wind turbines would be visible from the WWII Japanese American incarceration site, disrupting the sense of isolation and vast landscape that is fundamental to the visitor experience. Minidoka's remote location in the desert of southern Idaho provides an immersive setting that is essential to providing insight into the desolation and loneliness of WWII incarcerees. The vast expanse of open landscape on the horizon creates a sense of isolation on a vast landscape where Minidoka once stood. The extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that can be still felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. [...] This project would also harm local farmers and ranchers, as the construction of the wind turbines and associated infrastructure would impact their land use and reduce their ability to utilize their property for agriculture and grazing. Not to mention the inevitable consequences for birds, bats, and migratory wildlife in the area. I urge the Bureau of Land Management to carefully consider the potential negative impacts of the Lava Ridge Wind Project on Minidoka National Historic Site and the surrounding area. I also urge the agency to explore alternative, less destructive forms of renewable energy that would not have such a negative impact on the area's natural and cultural resources.
11473-1	Name Not Provided	No action!!!! Do not take more from those who have already endured so much pain and loss!! This project is taking advantage of minorities and their history. Trying to erase the site won't change how bad history is! As a Japanese American I feel strongly about minidokas mission to bring awareness to our cultures history and shed light on the abominations of this country in hopes to change the future generations. No lava ridge project
11476-1	Name Not Provided	No action on this project!! Shut it down. Do not again make Japanese Americans suffer under the US government o
11477-1	Suzu Kawamoto	I am adding my name and voice and heart to the call to stop any further action on the proposed Lava Ridge Wind Project. This project will completely bury any remaining evidence of the atrocities of the incarceration of the Japanese American citizens at Minidoka. In fact, I was disheartened, but not surprised, to not even see Minidoka mentioned in the proposal. Minidoka is a Landmark; an important part of American history that must remain and not erased. In the name of my Grandparents, aunts, and uncle, and all the Japanese American citizens who were unfairly incarcerated in Minidoka; losing their possessions, dignity, and years of their lives, I implore you to choose the "No Action" alternative.
11478-3	Sandra Thompson	We further believe that our wildlife and bird populations will be destroyed. We must also respect our historical national monuments and the people associated with them. This is not an appropriate location for a project like this.
11479-1	Suzu Kawamoto	I am adding my name and voice and heart to the call to stop any further action on the proposed Lava Ridge Wind Project. This project will completely bury any remaining evidence of the atrocities of the incarceration of the Japanese American citizens at Minidoka. In fact, I was disheartened, but not surprised, to not even see Minidoka mentioned in the proposal. Minidoka is a Landmark; an important part of American history that must remain, and not be erased. In the name of my Grandparents, aunts, and uncle, and all the Japanese American citizens who were unfairly incarcerated in Minidoka; losing their possessions, dignity, and years of their lives, I implore you to choose the "No Action" alternative.
11486-1	Lisa J. Ponder	Mourners. Mourners and Historians. Mourners, Historians, and Survivors. Not tourists. Locate the turbines in the field of Gettysburg. Site them at 9-11 Ground Zero. Put the turbines in Arlington Cemetery. Any of those places would cause less trauma. Choose the “No Action” plan. Otherwise, in the dark of night, the red lights of each turbine would shine with a silent and ominous message… the government can do it again. Immigrants came to America because they preferred the US to the place they left. They settled. They obeyed the laws. They honored the American dream. They worked hard for achieving and acquiring an American life.

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		How could living in barracks at Minidoka be considered cruel? Other people lived nearby in towns, in the same climate, so why would anyone consider it cruel to be housed in Minidoka's concentration camp (FDR's chosen term for the imprisonment site)? In Jerome, the "other" people had homes with insulation, homes that could withstand the heat, the cold, the dust, the wind; homes that had space for each person, with indoor water and toilets; The others had family photos and heirlooms still intact, allowed, and unconfiscated; The others had the "fruits of their labor" intact and available to use and to pass to descendants. Crucially, the "others" in Jerome chose to be there, prepared to be there, had autonomy there. They had not been forced to be there, kidnapped at gunpoint and with their home lives stolen… unlike Japanese Americans, even citizens, who had everything in their lives ripped away swiftly. The Japanese Americans and Japanese immigrants there were imprisoned without crimes and sentences to serve. The US government used its military power to incarcerate toddlers, working men & women, elderly and infirm grandparents, youth who had wanted to enlist, recent college graduates ready to enter the workforce, and pregnant women thus deprived of the medical care that could save their infants' lives and their own. In the past decades, Japanese American communities have worked HARD to heal and rebuild… and, the US as a whole has officially recognized and acknowledged the wrong of imprisoning people because their grandparents had been born in Japan. Putting Minidoka into the somber shadow of the turbines would create an ongoing psychological threat; It would undo decades of healing and would create new psychic harm; It would harm the deep solemnity of the very place where people "come to terms" with the generational impacts and cultural genocide perpetrated by temporary misuse of power. Siting the turbines in view of Minidoka would send a message way beyond mere disrespect; It would indicate an utter disregard for important American lives. It would also run counter to Congress's proclamation that the imprisonments were unjustified, and the reasons for forced removals were unfounded. President Roosevelt knew this; he'd received that documented information, yet authorized removal anyway. Congress has since publicly determined and said the causes of incarcerations were "war hysteria" and racism. Congress has decreed America must have more education about the incarcerations' unjustness— and, Congress continues to fund education about the incarcerations. Congress made Minidoka a National Historic Site Park. Protecting the integrity of the site/s is a key part of the education that Congress funds. The history site needs to convey more than "facts and data". The imprisonment site education must also convey the desolation and despair and devastation of personal lives the incarcerations created: havoc and ruin. Minidoka's ruinous impacts did not end with the camp closure: After "release", former incarcerees could not resume former lives and jobs, nor were they allowed to return home directly. Furthermore, the camp-caused impaired quality of life continued to impair whole families—for years and for generations—through camp-related illnesses and ill-health deaths. Additionally, the government pressured people to "disperse" and for their own safety many Japanese Americans from then on lived isolated from other Japanese Americans—whether in Montana or Chicago—to the point that their children grew up without learning family history or language and to the point that a very high percentage married non-Japanese; It seemed safer. Looming turbines, along with their sounds and monster red-lights at night, would do more than distract us from the history of the site. They would minimize and begin to erase the history. The very feel of the place is a core part of the place. Choose the "No Action" option: doing so would say and show—loud and clear—that Japanese American lives and histories do matter, and ARE American history. I say all this because data and facts are not the full story. The impact of the site and of your decision go far beyond data details and power points. I am a white woman, with no Japanese or Asian relatives or ancestors. My family came to the US in the 1600's and 1700's and I am a member of the DAR. I need to have Minidoka preserved in its feel as well as fact. It is important. Choose the "No Action" option.
11497-1	Name Not Provided	I am the son of a Minidoka incarceree. My father was a student at the University of Washington when he was arrested and sent to the Minidoka War Relocation Center. When he was released, he joined the Army and served this country for over 20 years through both the Korean and Vietnam Wars before retiring. He never returned to college to finish getting a degree. Like most incarcerees of his generation, he didn't talk much about his time at Minidoka. As we get older, we tend to reminisce about the past. So in 2018, over 20 years after his passing, I decided to see for myself what it would have been like to live in the place where he was detained. This trip was not a vacation. I was not a "tourist" but a descendant going on a pilgrimmage to experience a place that had a strong impact to my father's future. One of the things I remember most about that visit was the vast remote feeling of being in the middle of nowhere. Having lived in the Seattle area for over 40 years, I couldn't help but notice that quiet and isolated feeling of seeing the horizon in all directions. At Minidoka, there's a plaque next to the former site of a swimming area. This plaque has a picture of the lifeguards that watched over the swimmers. My father was a lifeguard and is in that picture. Seeing large wind turbines behind this area where children played to try to escape their isolation takes away from the true historic and educational experience of what it was like to live there. As I said, after my dad had passed, it took me over 20 years to realize I needed to make the trek to Minidoka. Had I made that trip and saw the structures proposed by the Lava Ridge Wind Farm project looming over the countryside, I would not have been able to experience the true landscape of the camp surroundings as my father would have seen it. To ensure future generations continue to have those same experiences, we need Alternative A: No Action
11501-1	Tara Rowe	I write today in opposition to the Lava Ridge Wind Project proposed by Magic Valley Energy, LLC. As an Idaho historian and a resident of Twin Falls, I have a vested interest in the outcome(s) of this proposal. Let me begin by stating emphatically that there is no outcome aside from this project ceasing to go forward that accomplishes what is needed here which is the protection, preservation and continued accessibility of the Minidoka Historic Site--the incarceration center for Japanese Americans once known as the Hunt Camp. This is a sacred site with a history unique and important to the people who once were incarcerated there, the people who make the trek back there each summer and the people in the agricultural community whose livelihoods continue to benefit from the impact of Japanese American laborers throughout the twentieth century. It would be an absolute travesty to lose any portion of this land, whether that be the footprint of the original camp, the current footprint of the historic site administered by the National Park Service or the view from the site over the surrounding area (a view that would be marred by wind turbines). On a personal note: In 2001, as a high school junior, I went with a history group to the site where some 13,000 Japanese Americans were incarcerated during WWII. At that time, Congress was in the process of designating the area a national historic site. Unfortunately, the space was in disrepair. Most of the barracks buildings had been hauled off to various farms, the warehouse and surrounding spaces were crumbling, and there was very little to represent not only the people who had once been incarcerated there, but also their impact on the area during their incarceration and in the decades after. Had Congress not designated the site and the Park Service taken administration duties, I'm afraid the sacred space would have been unrecognizable as anything but farm land. It is only because of the Park Service, congressional monies and the hard work of volunteers like Friends of Minidoka that the site has been restored to what it is today. If we allow business, like Magic Valley Energy, to encroach on the site, the long-term project of presenting the site's history to younger generations will suffer. I have now had the privilege of writing on the historic nature of the land in question. I am attaching both columns from the Idaho Capital Sun on this topic. I urge the Bureau to respect the history of this space, the lives of those who were taken against their will and incarcerated there, and the many, many Idahoans who desire to know that history by having continued access to the unobstructed site.
11508-4	Justin Gott, Daniel Gott, Josie Gott	4. The Minidoka Japanese Internment is located in the area also. It has a rich history which is being conserved for the public to come out and see so we don't forget this history of our Japanese ancestors.
11509-1	Leah Nguyen	he Minidoka National Historic Site is of critical importance to understanding our nation's history and the impacts of the violation of the civil liberties of Japanese Americans. It is important to treat this site and the community with respect. This site is not open and barren, it holds the pain, trauma, loss, and betrayal of the community that was imprisoned there. Maintaining the integrity of the site as a historical monument allows this history to be acknowledged and opens opportunities for healing and integration.

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11511-2	Elizabeth (No Last Name Provided)	I recently visited the Minidoka Internment Camp Historical Monument. Certainly, the quiet location for this important reminder of the past for current and future generations would forever be altered by the nearby presence of massive, disruptive wind towers with increased noise, construction and traffic. To place these towers adjacent to this monument shows disrespect for all people who have been wronged by the government.
11515-1	Charlotte Marie Okuma Johnston	Almost a year ago on Earth Day, April 22, President Joe Biden stated that "we've put environmental justice at the center of what we do, addressing the disproportionate health, environmental, and economic impacts that have been borne primarily by communities of color -- places too often left behind." It was in this sentence that President Biden emphasized the importance of listening to the voices of the marginalized and the role that the White House Environmental Justice Advisory Council has in creating policies that fulfill his and Vice President Harris's commitment to confronting long standing environmental injustices and to ensuring that marginalized, underserved, and overburdened communities have greater input on federal policies and decisions (whitehouse.gov). We are now at a pivotal moment in history in which the environmental justice decisions are in conflict with the voices of marginalized communities of color. And you, Kasey, and the fellow staff at the Bureau of Land Management are at the center of this conflict. Minidoka National Historic Site holds the legacy of the 13,000 imprisoned Japanese Americans from 1942-1945 (81 years from the singing of EO 9066).This means that the number of children, grandchildren, friends, historians, National Park Staff who would be negatively impacted by the Lava Ridge Wind Project would easily exceed the population of Boise, Idaho (250,000). The legacy of Minidoka was desolate. The legacy of Minidoka was unwanted land. The legacy of Minidoka was the spirit, patience, and strength of the incarcerees through farming, gardening, and landscaping that made this land desirable and auctionable to white veterans post-WWII. There are countless stories of feeling isolated, looking out into the empty horizon and watching the birds fly freely in the sky. When descendents make pilgrimages to the land to reconnect with their ancestors, they look at the horizon and see the vast emptiness that their ancestors once saw. It is the current feeling of isolation that strongly reflects the loneliness and imprisonment felt by the incarcerees. We are now at a point where the Lava Ridge Wind Project has already caused irreparable harm against the voices of the marginalized- those vowed to be protected by the Environmental Justice Advisory Council. The Environmental Impact Statement has already miscategorized the descendents and survivors of Minidoka as "tourists and recreationalists." The different options on the maps showcase how Wind Turbines would sit on the former Minidoka Internment Camp. Option A was not presented at the Mercer Island Open House until requested by attendees of the Open House. Staff members attending the Open House pointed at photos of survivors as child prisoners and called them "adorable" and "cute." I am not a descendent of the Japanese American Incarceration. I am a first generation Japanese American, born overseas as both a U.S. and Japanese Citizen and moved to Washington State at a young age. I am a granddaughter of a white-American WWII Lieutenant Colonel in the Air Force. I also hold love for both Eastern Washington and Northern Idaho as the majority of my U.S. family members live in both areas. Much like yourself and the BLM staff, I learned about the American Injustice of the Incarceration through school and the voices of the Japanese American Community. I am one of many examples of how it is possible to not have a direct relation to the Minidoka history and still understand the significance of the land, the horizon, and the great injustice that the placement of the Wind Farm would have on U.S. history. There is no consideration outside of Option A- the action of no action. Looking back throughout U.S. history, we hear stories of injustices- the trail of tears, slavery, segregation, the Chinese Exclusion Act, the Japanese Incarceration, and more. As President Biden stated on February 19, 2023, the incarceration was a shameful day of history where the Japanese American community "[lost] liberty, security, and the fundamental freedoms that rightfully belonged to them." My question to you and the staff at the Bureau of Land Management- what side of the history books do you want to be on? Will you be known as the Program Manager who represents a government entity that once again takes from the Japanese American Community?
11517-1	Daniel Kittaka	A critical part of my understanding of my personal identity and family heritage is the incarceration without due process of my paternal grandmother and her family at what is now the Minidoka National Historic Site. Accepting and acknowledging this heritage has helped me understand and change my relationships with others and discover how I can serve our society. Visiting the site with my father, whose mother had been incarcerated there, was a memory which I will never forget. As I walked the sight, I imagined my grandmother looking out over the desolate land and holding anger at her unjust incarceration and awe of the natural beauty at the same time like me in that moment. I shared some thoughts with my father and some I kept with myself. For me it was important to visit the site to open the book of processing the intergenerational impact of my ancestors' incarceration. The quiet, serene landscape felt comforting at that moment. The proposed Lava Ridge Project would disrupt those moments for future generations as it would cause a visual distraction from the emotional and spiritual work to be done by descendants of incarcerated people like myself and my father. I recommend considering a different site or alternative proposals C or D to minimize the impact to the Minidoka National Historic Site for the well-being of future generations.
11520-1	Shirley Louis (Nikki Nojima)	retired professor of creative writing and Asian American Studies at the University of New Mexico. I'm better known as Nikki Nojima Louis, my professional name as a writer and theater artist. I reside in Albuquerque, New Mexico, where I'm represented by Senators Martin Heinrich and Ben Ray Lujan and Representative Melanie Ann Stansbury. I and my mother are survivors of Camp Minidoka. I am also the daughter of a father incarcerated in Lordsburg and Santa Fe DOJ camps in New Mexico. On December 7, 1941, the FBI removed my father from our home in Seattle, Washington. It was my fourth birthday, and we never lived together as a family again. In 1985, I began a journey of discovery and recovery that continues today. This journey has taken me from the Pacific Northwest--where I was first drawn to the stories of camp survivors of Bainbridge Island and Seattle--to the Southwest, where I became immersed in the stories of the DOJ and Army-operated "enemy alien" camps of New Mexico and Texas. I established a readers theater touring group and forged a partnership with CLOE: "Confinement in the Land of Enchantment," an outreach project on the DOJ prison camps of New Mexico. Since 2014, we have brought "living history" plays on the Japanese American experience to diverse and underserved audiences throughout New Mexico Thirty-eight years ago, when I began researching, teaching, and presenting plays on the Japanese American experience, my focus and that of my colleagues was on bringing to light the injustices of Japanese American incarceration. In the intervening years, a plethora of sociological and historical traumas has brought us to a keen awareness of injustices and systemic racism. As a seven-year-old returning to society in 1945 after incarceration in a desert concentration camp and reaching maturity in the turbulent '60s, I had little interest in Japanese American civil rights. The causes that engaged my interest then were the solidity of the African American, anti-war, and women's movements. Denial, shame, guilt, and silence--i.e., internalized racism--were at the forefront of the community trauma that affected my long disinterest in my own experience of displacement. I cite these personal details because they are echoed in the conversations, oral histories, and documentation of countless Japanese Americans who experienced this community trauma. MNHS and other National Park incarceration sites are meeting grounds for the sharing of memories, reflection, healing, and knowledge. For the DEIS to identify them as tourist and recreational sites is short-sighted and insensitive. I wish to state my support of the No Action Alternative (Alternative A) as it promises to protect the integrity of the Minidoka National Historic Site. I advocate for MNHS to be viewed as Traditional Cultural Property and listed on the National Registry of Historic Places. In two recent executive orders, President Biden pledged to "deliver equity and environmental justice," and "advance racial equity and support for underserved communities." I ask that these promises be fulfilled by delivering environmental justice to MNHS and supporting a Japanese American community that has been historically underserved and racially targeted since the early days of its immigration. I ask that the Minidoka National Historic Site's "immersive feeling of isolation" that is honored by other National Parks be preserved for camp survivors, their descendants, and present as well as future seekers of knowledge, history, and legacy.
11525-5	Erin Schmith	In any case, I agree with the Japanese American community that any change to the Minidoka NHS, the larger WRC footprint, or the surrounding environment as proposed under this Draft Environmental Impact Statement, fails to protect the integrity of Minidoka NHS. I support Alternative A - No Action.
11526-1	Mikka Tokuda-Hall, Wendy Tokuda, Marilyn Tokuda, Maggie Tokuda-Hall	10 members of my family were incarcerated at the Minidoka Internment Center. My parents met there and my oldest brother was born there. My parents lost everything they had, including my father's drugstore. So Minidoka is a sacred place for me. When I go there, I can feel the spirits of my grandparents, parents, aunts and uncles and my brother. That is why I am against The wind towers are taller than the Space Needle in Seattle, where I was raised. I know how the needle dominates the view of that city. The thought of dozens of these huge wind towers as the backdrop of the Minidoka National Monument is upsetting. The towers would overwhelm Minidoka. Instead of a pilgrimage to this historic site, it would be more like- hey, look at all these wind towers. Part of the experience of visiting this historic site is to feel the desolate nature of the location. Japanese were carted away to this remote spot in the desert for a reason- to prevent them from spying. This is part of the educational aspect of the Minidoka monument, and for descendants like me, the feel of the location strikes deep at my soul. I can feel my parents there. I can feel what they went through. it is a soulful experience that would be destroyed by the view of dozens of wind towers, taller than the Seattle Space Needle. Frankly, for me, it feels like an insult. I am an environmentalist. I have solar panels and I drive a plug in hybrid car. I compost and have an organic garden. I am all for wind power, just not in this location. let all of America experience Minidoka as it truly was in 1942- a prison set in the remote desert, not a historic site overpowere by a windfarm.
11529-1	Erika Katayama	s a member of the Japanese American community, and a direct descendant of incarcerated individuals of the WWII American concentration camps, I vehemently oppose the construction of a wind farm near Minidoka. I experience Minidoka National Historic Site as a product of generational trauma, but also as a person that wants the location preserved as an important reminder of the horrible effects of racism and xenophobia. My grandma and additional family members bear the scars of the

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		unjust imprisonment, I see Minidoka as a distinct reminder of the hateful treatment that Japanese Americans and Asian Americans experience still today. Education and awareness is critical in the efforts to eradicate hateful treatment of others, and Minidoka must be preserved in order to continue this education.
11530-1	Nicole Iwamasa	As a descendant of Japanese Americans who were interned during World War II, I think this project is incredibly disrespectful towards the communities that the US government has previously decimated. There are always alternatives to support renewable energy projects that do not harm communities of color, and should you choose to disregard pleas on the half of the Japanese American community to find another site you will not only be perpetuating a legacy of Western Supremacy, but also degrading historical remnants of past injustices. You should move to take no action. I and many other people would hope to continue visiting historical areas, but this project would impede my ability to do so.
11537-1	Chisao Hata	My name is Chisao Hata and I am a third generation Japanese American and both of my parents were held at one of the incarceration sites. I am writing to adamantly oppose the project to build wind tunnels at Minidoka. This effort is not only an affront to the years of organizing for Redress, the passage of the Civil Liberties Act in 1988, the efforts to gain educational and interpretive centers at the incarceration sites and our generational trauma from one of the most racist acts in American history. This is a time to acknowledge, rectify and honor the histories of people of color in America. The act of building these towers ignores the decades of work so many of us have done to protect these sites of conscience so our American history is inclusive, honest and correct. DO NOT INVADE THE SITE OF MINIDOKA. DO NOT IGNORE OUR HISTORY. DO NOT MOVE FORWARD ON THE LAVA RIDGE PROJECT.
11538-1	Francis Sumida Palk; Japanese Ancestral Society	WE AT IKoi no Kai would much prefer "NO" towers at Minidoka!" I was one of the evacuees at the camp and remember, how "upsetting" it was to be in the "rehabilitation" camp. My whole family wants to have it remembered. Dad could not stay with us as he was forced to work at the Anderson Dam, so we missed him. My other relatives were sent to Nyssa and Ontario to do hard labor on the farm to raise sugar beets. PLEASE, we do not want our newer relatives to forget! SO MINIDOKA needs to be remembered WHOLE.
11539-1	Karen Hardesty	While my father was not a resident of Minidoka, he was a forced resident of Manzanar and Tule Lake Concentration Camps in California. I haven't had a chance to visit those camps, but my husband and I were able to visit Minidoka. The experience was sobering, as I thought about my father (he was around 11 years old at the time) and his family having to live in these conditions. I understand the need for clean energy, but having these wind turbines so close to the Minidoka Historical Site will ruin the experience when visiting the site. These camps were established in remote areas of the US for a reason, and when visiting the camp, you can feel how remote and isolated you really are. These wind turbines will minimize that experience.
11544-1	James Rodgers	I have visited the Minidoka National Park on several occasions and worked directly with survivors and their descendants for a number of years. They speak of trauma, racism, and being scapegoated as villains by the U.S. government and their own neighbors. To call this place a "tourist attraction" is an insult to those 12,000 people incarcerated there during WWII. Minidoka is a concentration camp that needs to be memorialized as it existed from 1942 - 1946 as a reminder of how fragile democracy is. Part of that memorialization needs to be respecting the desolate viewshed and the feeling of unbearable hopelessness that view inflicts. Those people of Japanese descent forcibly removed from their homes on PNW farms and forests had nothing to look at but endless planes of desert sand and sagebrush. To mar this view with hundreds of windmills will only cause further damage to the Nikkei community. Please respect this history and don't compound any more pain and trauma. The only answer for this development is Option A - No change.
11546-1	Dan Sakura	Thank you for the opportunity to submit comments to the BLM regarding the Lava Ridge wind project. I'm a descendant of three genera□ons of Minidoka survivors on my father's side. I'm proud of my grandfather Chester's military service during World War II, my grandmother Agnes for raising three boys by herself in a U.S. Government prison camp and my 87-year old father, David Sakura, for his work to tell the story of Minidoka to young people throughout New England. [photos] Chester Y. Sakura, 442nd/MIS (le□), Agnes Sakura, David, Gerry & Chet David Sakura, Minidoka Survivor I'm also proud of the work of the Japanese American community and the National Park Service to turn a place of trauma into a place for healing. I'm proud of the hard work and cultural sensitives of the National Park Service leadership, interpreters and resource stewards from 2000 to the present. They demonstrate the highest level of public service. In close partnership with the Japanese American community and many partners, they have worked tirelessly to preserve Minidoka's sacred ground, tell the whole story of America, honor Japanese American veterans and convey the hardships and courage of Japanese American and Alaska Native survivors and descendants during and after World War II. For over 22 years, star□ng in late 2000, I've worked to designate, expand and protect Minidoka, in a variety of roles, including serving at the White House (Council on Environmental Quality) during the Clinton Administra□on. I was grateful for President Clinton's decision to designate the Monument and the bipartisan leadership from the Idaho and Washington State Congressional delegations to expand and redesignate Minidoka in 2008. Representatives Mike Simpson, Jay Inslee and Senators Larry Craig, Mike Crapo, Maria Cantwell and Paty Murray worked across the aisle to advance our country on its road to healing. I appreciated the opportunity to support the National Park Service's acquisition of the Farm-in-a-Day and Military Police proper□es through legislative and minor boundary expansions. In 2009, through the leadership of Secretary Ken Salazar, the NPS and BLM worked together to relocate the Southwest Inter□e Project – North (SWIP) project away from the park. The Department of the Interior's commitment to the Japanese American community dates back over 75 years to Sec. Harold Ickes who worked to improve conditions for incarcerees. I've atended two Pilgrimages and brought my family to Minidoka. As an advisor to the Minidoka Pilgrimage Planning Commitee, I look forward to the 2023 pilgrimage in July. I've worked to designate Tule Lake and Honouliuli National Monuments, acquire land at Topaz and the Bainbridge Island-Eagledale Ferry Dock (Pritchard Park), and pass bipartisan legisla□on in 2022 to establish the Amache National Historic Sites in Colorado. Partnering with the BLM. During my career, I've worked in close partnership with the BLM to acquire private land in Idaho, Montana, Arizona, New Mexico, Wyoming, California (with Ed Hastey), Colorado and Washington State to protect National Conservation Lands and advance BLM's land tenure goals through the LWCF, FLTFA and land exchange programs. I respect the important – and challenging -- work that the Bureau does to find the right balance between multiple competing uses of the land and its important role in the fight against climate change.
11549-1	Carmen Tsuboi Chan	My name is Carmen Tsuboi Chan. I am a sansei and have visited the Minidoka site with my father who was incarcerated @ Minidoka, along with his parents and 5 siblings. I am writing to you to demand "No Action" on the Lava Ridge project which would dishonor this sacred site. We were not "tourists and recreationalists" as sited in your report. My father was a man of few words, especially about the incarceration ~ but when we were there with so many other survivors, he immediately opened up and talked about the pain and injustices that eliminated their family grocery store, home, schooling, and lifestyle. This was a scar on democracy that needs to be preserved to continue educating future generations and the benefits I and others have been able to enjoy because of their sacrifices. Let the spirit of healing continue unadulterated through preserving this site. Though Japanese Americans are looked upon as the model minority ~ you need to know we will not sit silently again for this racist action!
11551-4	Erin Shigaki	Thank you for the opportunity to submit public comments regarding the proposed Lava Ridge Wind Project. As a descendant of Minidoka, I strongly oppose the proposed Lava Ridge Wind Project and support Alternative A–the No Action alternative. [...]

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		In addition to flaws in the DEIS, I wish to express our concerns about BLM's failure to follow Biden Administration policies in which he has committed to simultaneously "deliver equity and environmental justice" (E.O. 140574) and "advance racial equity and support for underserved communities." (E.O. 139855) The Federal government must honor these assurances by protecting the Minidoka National Historic Site. I support renewable energy and a green future but not at the expense of our community or other local communities who oppose the Lava Ridge project. Please do not install the Lava Ridge Wind Project or any wind farm project at or near our sacred Minidoka National Historic Site. I strongly believe that this Wind Project would mark a step backward in the U.S. government's acknowledgment that the World War II mass incarceration of my family and community was wrong. I unequivocally support the work of the National Park Service to preserve Minidoka's fundamental resources and values unimpaired for the benefit of future generations. I encourage BLM to adopt the No Action Alternative and begin a public planning process for the ACEC. I look forward to working with the BLM to protect Minidoka's sacred values for current and future generations.
11554-6	Raul Labrador; Idaho Attorney General's Office	Fourth, the Project will dishonor the Minidoka National Historical Site—a memorial to the injustice of Japanese American internment camps that serves as a powerful reminder of the perils of acquiescing to government overreach in times of crisis. By placing 400-foot-tall wind turbines around the Minidoka Site, the Lava Ridge Wind Farm will strip the site of its historical authenticity and lessen its impact.
11559-1	Maddy Lim	The Minidoka National Historic Site is an incredibly significant place for not only the Japanese American community but for the entire world, it offers an opportunity to reflect on the complicated history of the United States while contributing to the to the continued efforts of never allowing such an event to occur again in this country. Allowing the completion of this project to impact the visual and emotional experience of visitors to this site would be yet another instance of Asian American history being overwritten by large corporations. Marginalized groups like the Asian American community are expected to validate their rights to visit and exist in sites that are directly tied to them and their descendants. To build near this historical site would be to disparage the sacrifice and incarceration these families were forced to endure during World War II, along with their descendants who wish to visit the site today. To visit and reflect at this site is not a privilege, but a right held by every single Japanese American and every other individual who wishes to experience the impacts of legalized racism during wartime.
11562-1	K Komorita; Tsuru For Solidarity / Friends of Minidoka	As a descendant of Minidoka camp survivors and a staunch environmentalist, I ask you to please move forward with the "No Action" alternative. Japanese Incarceration was not that long ago. These are deep, deep wounds that will take generations to heal and it's absolutely unreasonable to ask us to taint that opportunity to heal with this project. BIPOC + POC communities are continually demanded to shoulder the burden of climate change - both the burden of its costs but also its solutions and this plan continues to play into that pattern. My Dad, brothers, and cousins have been wanting to make the trip out to the Minidoka site in order to honor our Grandfather and also learn a little more about him. My Grandfather was only a teenager when he, his family, and his cousins were all incarcerated at Camp Minidoka. The trauma of camp cut deep in our family, so we've needed time to process and tend to those wounds and we have finally reached a point where is possible. (It only took us 34 years.) I can't help but think of our elders who are only now going into therapy because it's finally becoming more socially acceptable and are probably in similar situations. To finally arrive, look out at the site, and see AND hear a farm of Space Needles would be a heartbreaking and frustrating reminder of State intrusion in our communities. The change you're asking for is not just visually altering the site's landscape, but altering the atmosphere. Silence literally gives our brains room to process and mental/emotional processing is a key to healing. There are still camp survivors who are now our elders and at the very least, they deserve the chance to heal from a traumatic life-changing experience without disturbance. Please move forward with the "No Action" alternative. Thank you.
11565-1	Norie Sato	I am writing to voice concern for the proposed Lava Ridge Wind Farm and its impact on the Minidoka National Historic Site. I am a first generation Japanese American, born in Japan. Our family did not arrive in the United States until after the war. Though we were not personally impacted by the incaceration of Japanese Americans during the war, the history of this action has impacted my life in the United States and how I have been identified since my arrival in 1954. I visited the Minidoka National Historic Site in 2019 for the first time and was moved by the suffering and the conditions under which the incarcerated were housed and the difficulties they endured. The site makes this action taken by the American government clear about its cruelty and unjust nature of the incarceration, but is educational not only from a fact-based perspective but also from an emotional one. The extent of the camps, the remote nature of its location and the rather desolate nature of the site is quite striking and one cannot help but gain a deeper understanding of the egregiousness of such an action. The DEIS fails to include the importance of education about the negative psychological effects of incarceration at such a site, which is enhanced by visiting this site. It would be a travesty to allow a commercial enterprise such as the wind farm to interrupt the solemn sense of pilgrimage, commemoration and reflection of the site. The scope and visibility of the turbines would break the importance of the site in its context. The DEIS does not seem to understand that the feeling of isolation is an important part of the viewshed which would be damaged by the existence of the Lava Ridge Wind Farm. This is not only a site for education, however, it is also a site to honor the memory of those lost and who suffered here, a site for pilgrimage and a sacred site. I demand Option A: No Action be taken.
11569-1	Name Not Provided; Marley Haller	I choose "no action" because Minidoka should be preserved as a historic site.
11570-1	Joy Shigaki	I am writing to demand Option A: No Action on the Lava Ridge Wind Project. It is unjust and wrong. It's clear the DEIS failed on many fronts to protect the sacredness of this site. I am a descendant of the thousands Japanese Americans that were imprisoned during World War II in Minidoka. My great grandparents, grandparents, and many uncles and aunts were forced to live in these inhumane conditions for years. Additionally, my father was born on a brutally cold, snowy day in January 1944 by a horse doctor. I can only imagine the fear my grandmother felt and the danger she was in delivering my father in this way. At the same time, I grieve for the many women who's babies (or themselves) died during childbirth. This entire experience has carried incredible pain, loss, harm, and humiliation for my family and those in my community for generations. I am absolutely incensed and disgusted that this wind project has been considered near this National Historic Site. Minidoka is sacred place for pilgrimage and healing for survivors and descendants. It has been an important place to remember and retell the painful history while elevating the joy and resilience of so many despite the inhumane conditions. Also, it serves as an immersive and visceral reminder for visitors of what occurred on this land. By deepening one's understanding of the historic events and allowing a quiet, sober surrounding, it provides the public a powerful experience. It is very clear the DEIS failed to protect the significance of the land surrounding Minidoka to serve as a place of healing and reflection. Additionally, the DEIS grossly and insensitively identified NHS as for "Tourists and Recreationalists." It's disgusting. It's unconscionable that 400 wind turbines might be erected near Minidoka. Given the height and scale of the wind farm, it will desecrate the site and be an impairment of resources. The viewshed will be ruined after finally making this place a site of conscience and part of the National Park Service. As an environmentalist, I support renewable energy. Yet, allowing this wind farm near this National Historic Site is perpetuating the harm, violence, and erasure of my family's history and of so many others in this country where our past has been continually ignored, covered up or erased. I implore you to stop the Lava Ridge Wind Project NOW.
11572-2	Elissa Dingus	As such, I stand with the Japanese American community in supporting Alternative A - No Action. Any change to the Minidoka NHS, the larger WRC footprint, or the surrounding environment as proposed under this Draft Environmental Impact Statement would fail to protect the integrity of Minidoka NHS.
11575-1	Jeff Matsumoto; Portland Japanese American Citizens League	On a recent trip to visit family in California, I drove along Highway 580 towards Livermore, CA through Altamont Pass Wind Farm. I thought how much the area had changed in 40 years. What started as a few wind turbines dotted along the pass has now become a wave of turbines countless to the eye to behold. Whether it is a maximum of 269 wind turbines or 400 depending upon proposal, the thought and i mage of one is one too many. The Minidoka National Historic Site is a sacred place to the families unjustly incarcerated there during World War ll and serves as a lesson to remind us how prejudice and racial animosity can supersede our civil rights. The Minidoka National Historic Site also serves as a healing place. It is a place for us to remember and recognize the courageous acts of the Issei and Nisei (First and Second) generation whose lives were up ended with incarceration. It is a place

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		for our own healing as we try and understand what happened. All of this is diminished with the placement of wind turbines and the Lava Ridge Wind Project and for this reason I strongly urge support of Alternative A: No Action, in which the BLM would not authorize construction, operation and maintenance, and decommissioning of the project. Thank you for your consideration and opportunity to share our comments.
11577-2	David Inoue; Japanese American Citizens League	On behalf of the Japanese American Citizens League please accept our comments in response to the Draft Environmental Impact Statement (DEIS) for the proposed Lava Ridge wind Project. This project proposes the construction of a massive wind farm sited on Bureau of Land Management land within clear view of the Minidoka National Historic Site, where thousands of Japanese and Japanese Americans were incarcerated during WWII. The JACL was founded in 1929 to combat the increasing racism against our community in the form of numerous laws specifically targeting Japanese Americans, Asian Americans, and other communities of color. The anti-Japanese racism exploded in the wake of hostilities between Imperial Japan and the United States leading to the incarceration of 120,000 people of Japanese ancestry at sites such as Minidoka under the false reason of national security. Sites such as Minidoka were selected for their remote and largely desolate locations. Since the end of the war, and subsequent diaspora of survivors throughout the country, the incarceration sites have taken on special meaning in the Japanese American community through the development of pilgrimages of survivors to return to the sites of their incarceration to promote healing and reconciliation. The government, and particularly the National Park Service have affirmed the vital importance of sites such as Minidoka establishing national historic site designations and the establishment of interpretive centers to educate the public about the incarceration experience, the desolation being a very important component of educating visitors to Minidoka about the feelings of those who were incarcerated. As such we implore upon the Bureau of Land Management to preserve this component of the Minidoka visitor's experience. We urge the Bureau of Land Management to adopt option A, or no action. The DEIS notes specifically that alternatives C and E would have negative impact upon the value of the Minidoka site to the Japanese American community. We urge you to acknowledge this damage not just in word of the DEIS, but in the action of taking no action on this project at this time. [...] We acknowledge the vital interest of expanding renewable energy such as wind power, but believe that this goal can be accomplished without infringing upon the historic value of the Minidoka site. We recognize the goal of the Department of the Interior to make land available for renewable energy projects such as the proposed Lava Ridge project. However, we remind BLM and Interior of the commitment of this administration and Congress to preservation of our nation's cultural and historic heritage. The very establishment in 2001 as the Minidoka Internment National Monument and later expansion and restating as the National Historic Site are in itself indicators of our country's desire to protect and preserve the historic value of the site. more recently, Congress passed the Japanese American Confinement Education Act which allocated an additional $42 million to the Japanese American Confinement Sites Grant Program administered by the National Park Service "to identify, research, evaluate, interpret, protect, restore, repair, and acquire historic incarceration sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the nation's commitment to equal justice under the law." As the BLM reviews comments regarding the Draft Environmental Impact Study, we urge you to take special note of the remarks submitted by the Friends of Minidoka with which we concur and lift up as the most comprehensive response on behalf of the Japanese American community. While the Friends of Minidoka might provide the most comprehensive comments, the comments of survivors and their descendants are of even greater value. At nearly 750 feet in height and in numbers that would overwhelm the historic site, this project would be in direct contravention of the effort to preserve the site and be a failure in demonstrating our nation's commitment to equal justice under the law. We urge you to adopt option A, that of no action...
11579-1	Karen Kawaguchi	As a Japanese American whose family was incarcerated at Minidoka, I strongly object to the Lava Ridge project. This would desecrate an important historical site which preserves Japanese American history. Find another site for this project -- on white people's land.
11580-1	Name Not Provided	I'm concerned and appalled that the Laval Ridge Project failed to protect the significance of the land surrounding Minidoka as a place of reflection and healing for current survivors who were unconstitutionally incarcerated during WWII and their family and friends. As a Japanese American who's grandparents and family were part of the incarceration, this project has taken an insensitive approach, neglecting the cultural significance of the site and the preservation of historic land. The government who once failed to protect American citizens, should do whatever they can to continue to do right by their history and stories. Please consider a better alternative that will not impact the integrity of the site, so future generations of Japanese Americans can learn about their own history and other Americans can observe and reflect.
11581-1	Barbara Hall	strongly disagree with any of the proposals to pollute our land with miles of huge unsightly windmills. They will completely ruin the reflective experience at Minidonka National Historic Site. This site is sacred land to many descendants of Japanese Take a drive through Washington and Oregon and you can see how they have ruined the landscape and what was once beautiful landscapes. I wish I had more time to cite some of the information I've learned about wind power, but it is not by far the most efficient or environmentally friendly method to generate power. I highly recommend that you do not approve this big east coast company to come into our state and ruin it, simp Thansk Barb Hly to send power to California.
11582-1	Donna Branch-Gilby	Given the historical and cultural importance of the memorial to Japanese American incarceration at Minidoka, I believe the Lava Ridge Wind Project should be sited on property that preserves the memorial. Given that 13,000 Americans of Japanese ancestry were incarcerated there, solely because of their ancestry, the memorial has significant value to be preserved. It is a lesson to we contemporary Americans of the persistence of racist thinking and its periodic eruption into action as with the Japanese incarceration. President Ronald Reagan acknowledged this devastating act of racism when he authorized reparations to thousands of Japanese Americans. I urge the Bureau of Reclamation to honor the memory of those incarcerated at Minidoka by leaving it untouched for future generations. Revise the Lava Ridge Project to leave the Minidoka Memorial to to honor those Americans incarcerated at that site.
11587-1	T. Pulkka	This proposal fails to adequately protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience.
11592-1	Randall Meehl	I am the grandson of Japanese Americans that were ripped away from their homes and sent to camps such as this, and what this project proposes is nothing short of an attempt to erase this tragic legacy of American history to corporate "greenwashing". There is an dire need now more than ever to preserve this site and the many other concentration camps the United States ran, to preserve the history of when we as a people failed at our central principles so we do not repeat these atrocities again. This site is not just some plot of land, people lived and died here, all while under the barrel of US soldiers and trapped behind barbed wire for simply being Japanese, but their story of perseverance shows us the true spirit of this nation. It is so convenient for a government bureaucracy to just so happen to select this specific place, a historical monument of the horrors this country is capable of, and schedule it to be erased, all the while patting themselves on the back for how "progressive" they look. It is readily apparent this was not researched or even looked into, and the callousness of putting a wind farm the size of Seattle over this site where people like me were imprisoned at this time is beyond the pale. This proposal needs to be ignored, passed on and instead talk with the people who had families that went through these events to help create a preservation minded plan, rather than hand land over to a corporation to do what it pleases regardless of what damage it does to the people of this nation. Do nothing to advance this plan, reject this demolition of American history.
11595-1	Maya Abo Dominguez	I request that Alternative A - no action is selected and I would like to comment on the notion that Alternatives C - E are repeatedly referenced throughout the DEIS as having "reduced visual and auditory impacts as seen from susceptible cultural resources, such as Minidoka NHS, Minidoka WRC..." as compared to Alternative B as seen in Table ES-2. Although these alternatives aim to reduce the footprint of the project site and visual and auditory footprint, they do not eliminate the harm caused. Going forward with this project in any capacity creates irreversible harm on the survivors who were incarcerated at Minidoka, Japanese American Community, and all Americans. We return to Minidoka to remember what happened to us, to our ancestors, to our friends, family members, neighbors, and community members. To build this project is to contribute to the erasure of the Incarceration by desecrating the site and viewshed. This erasure is not without precedent, with the land that constituted Minidoka WRC being sold to white-only WWII Veterans and the barracks being sold to homesteaders after the dissolution of the camp, not to mention that the Incarceration continues to be reduced to little more than a footnote in WWII education. Although alternatives C - E attempt to "reduce" the impacts on the Japanese American community, they still contribute to the harm caused by the Incarceration on survivors and their descendents. The generational trauma imposed on the Japanese American community in the lead-up to, during, and the aftermath of the incarceration will not be "reduced" by having the wind turbines built so they are generally more in the "middleground" rather than the "foreground", as put forth in Table

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		3.16-5. Although this DEIS attempts to describe quantitatively a smaller viewshed and site footprint, this is not sufficient to describe how having the entire horizon filled with wind turbines (no matter how small they appear) negatively affects the integrity of the experience of returning survivors, descendents and other visitors.
11603-3	Sheri Freemuth	Finally, I am confident that you will receive many comments regarding the untenable negative impacts of the proposed action to the Minidoka NHS. I have enclosed a blog post that I wrote in 2011 at a pilgrimage and unveiling of a triptych at the site. It speaks to the quiet, honor and beauty of this place. In this context though, this short essay demonstrates that the NHS has been positively evolving over the years with careful collaboration between the NPS and the Friends of Minidoka. In addition to the federal dollars committed to the improvement of the site for the PUBLIC's benefit, thousands of dollars of private donations have been invested to enhance this site so that the full story may be shared with the American public (a story that is even more valuable in our present age of intolerance). I recommend the no-action alternative.
11604-1	Name Not Provided	The Department of Interior and BLM should formally apologize to the Japanese American community for accepting this permit request, conducting this EIS, and putting survivors and descendants through yet more generational trauma. The BLM and DOI should be ashamed of themselves for pushing this forward given the history of DOI bureaus (BOR, BLM, War Relocation Authority) and their treatment of Japanese Americans during WWII. The Lava Ridge project is fundamentally flawed and causes impairment to Minidoka National Historic Site. The EIS should be terminated [...]
11606-1	Michael Wissenbach	I am very concerned about the potential adverse effects of the proposed Lava Ridge Wind Project on south central Idaho in general and on the Minidoka National Historic Site in particular. The adverse effects of this massive project would be felt over a huge area, and these impacts would be most detrimental to the cultural integrity and the cultural experience of the Minidoka National Historic Site (Minidoka). My association with Minidoka began in 2001, when I was hired by the National Park Service as a Natural Resource Specialist. Through my work, I became well acquainted with the site and its resources, both natural and cultural. The most important discovery I made regarding Minidoka was the importance of that site to the large Minidoka community - the survivors of incarceration and their many diverse family members whose lives were changed forever by that experience and that site. My experiences at Minidoka are dominated by the understanding of the pain and sense of despair that these people suffered. Minidoka is truly sacred ground to these people, this community, and our country and should be protected as such. In addition, to experience Minidoka is to become aware or be reminded of the civil liberties we enjoy as citizens of the United States and how they must be protected for all peoples. The National Historic site provides this experience to all who visit there. The intrusion of and visual effects of the proposed Lava Ridge project would dramatically and adversely impact Minidoka's cultural setting. The presence of giant wind turbines and electric transmission lines is not compatible with Minidoka's feeling and association with the historic wartime incarceration and loss of liberties suffered by the Americans of Japanese descent who were held there against their will. Furthermore, none of the action alternatives examined in the DEIS minimize these impacts to an acceptable level. The only viable alternative is the No-Action Alternative. Please select the No-Action Alternative and deny the application for this proposed project.
11608-1	Alison Yasuoka	#StopLavaRidge In support of the Friends of Minidoka, in solidarity and in honor of my great grandfather, Giichi Tamura, who was a wrongfully incarcerated Issei, at SFIC, Santa Fe Incarceration Center, I, Alison Yasuoka, am against the Lava Ridge Wind Project. I am instead in staunch support of the preservation of Minidoka National Historic Site. I support the words of the Japanese American National Museums President and CEO, Ann Burroughs: "We support our colleagues at the Friends of Minidoka. The community must speak out to ensure that their voices are heard and to prevent the desecration of this historic site. Minidoka National Historic Site must be preserved for future generations as a sacred place of reflection. Another site must be found for the wind project to prevent the erasure of this painful chapter of American history." Some may wonder, why would family members want to preserve the site where injustices against Issei, Nisei, and Sansei occurred? All of the Japanese Incarceration Sites are reminders of the courage, the strength, resilience, leadership, and creative capacities of our family members to endure and persevere against the injustices they faced. We refuse to silently allow the Lava Ridge Wind Project to move forward and erase our stories. The trauma experienced from the wrongful incarceration of Issei--first generation Japanese immigrants, and Japanese American Nisei (second generation) and sansei (third generation) is on-going and it is imperative that our voices continue to be heard, and our stories told. Integral to the sharing of stories, is the ability of present and future generations to have opportunities to visit sites like the Minidoka National Historic Site without it being overshadowed by these ginormous, 740 feet wind turbine structures. In reading the stories of those who were incarcerated, the guard towers were often mentioned as constant reminders of being overpowered by discrimination, racism, and injustices that our families faced. Another foreign object dominating the landscape is the last reminder needed of how some make decisions without regard for the truth, and really without understanding what it is like face hate in such a tangible way.
11610-2	Lisa Shiosaki Olsen; Intermountain District Council-Japanese American Citizens League	On behalf of the Idaho Falls Chapter of the Japanese American Citizens League, I am reissuing this letter to express my grave concern regarding the proposed Lava Wind Ridge Project and its significant negative effects on the Minidoka National Historic Site, a unit of the National Park System. The current recommendations to build windmills in this area will cause irreparable damage to this community. Minidoka National Historic Site is a sacred place for my family. My grandfather, Kiichi Shiozaki, immigrated to America from Japan to build a better life for his family. He worked for the Oregon Shoreline Railroad as a foreman in Blackfoot, Idaho, until Pearl Harbor was bombed in WWII. This was a devastating time for my family who suffered racial persecution and lost everything: home, salary, job, pension, friends, and graduation honors. Despite this, my Grandfather encouraged my dad and two uncles to fight with the 442nd Regiment. He told his sons: " you are an American, and you will fight for America. If you have to die for America, then so be it. I would rather you came home in a body bag than to dishonor this country or your family." By joining the military and serving with distinction, my father and uncles fulfilled my grandfather's request and were honored with Congressional Gold Medals and many other service medals. My sons have continued to honor this request by serving in the Army and Navy. I am proud of my family's military service and the service of thousands of other Japanese Americans during World War II, despite the fact that their families were incarcerated at Minidoka and other sites. My Uncle Hero (Hiro) Shiosaki fought for America but believed that the Japanese American Incarceration story needed to be preserved. He began work in the 1970s to see Minidoka recognized on the National Register of Historic Places and as a commemorative site to mark Idaho's Centennial in 1990. He worked hard to ensure that the site would be preserved for future generations. I remember visiting Minidoka with my parents and uncle during meetings with representatives and senators. The area's dry heat and barren dirt still contained rusted salt and pepper shaker lids and the shed skins of rattlesnakes. The loneliness and heartbreak seemed to blow around the area with the dust. Minidoka was designated as a National Monument in 2001, and my Uncle Hero was part of this process. I am grateful that the National Park Service has built on my uncle's stewardship over this important part of history by preserving this area and allowing individuals to visit this sacred site to learn and to heal. My uncle persevered for many years to tell this sad story of courage of JA Incarceration and the 442nd Regiment. He carried education booklets from the Japanese American Citizens League with him and spoke in numerous states to students, groups, and colleges. Sadly, he and my father are no longer here to tell this story, but it is a story that is dear to my heart and is a crucial part of Idaho and American history. I am glad that the National Park Service is honoring his legacy of service and commitment by working to preserve Minidoka unimpaired for the benefit of current and future generations. I was pleased that the Idaho Congressional delegation worked to pass bipartisan legislation in 2008 to expand and redesignate Minidoka as a National Historic Site. I also appreciate the Idaho Delegation's support for legislation in 2009 to relocate LS Power's proposed Southwest Intertie Project (SWIP) power line away from the entrance of Minidoka. Thankfully, the Department of the Interior and Congress protected Minidoka from the power line that would have been located over Minidoka's Honor Roll. I also appreciate Congress's support for the Japanese American Confinement Sites Act (Public Law 109-441) and annual appropriations for the JACS grants. Federal funding from Congress has enabled the Friends of Minidoka to rebuild a guard tower at the entrance to the park and support NPS's mission at the Park. The Friends of Minidoka and Minidoka Pilgrimage Committee have also worked in close partnership with NPS to advance the park's mission. I am especially proud of the Honor Roll at the entrance to Minidoka that honors the World War II military service of about 1,000 men from Minidoka including 73 men who made the ultimate sacrifice during World War II.

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		I am also grateful to Congress for authorizing the Congressional Gold Medal to recognize Japanese Americans who served in the 442nd RCT and other units. My uncle Hero was able to receive the medal in 2012, before his passing in 2017. It was a highlight for him and my family and is a testament to our nation's commitment to acknowledge Japanese American patriotism and ability to overcome racial prejudice. In addition to federal preservation efforts and the acknowledgment that the incarceration was wrong, I am grateful to the State of Idaho and the leadership of Governor Little and previous Governors in commemorating the annual Day of Remembrance every February. [...] Thanks to the tireless work of my late Uncle Hero and other local partners in Idaho, Minidoka's fundamental resources and values include serving as a place "… for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serve to commemorate those who survived this difficult chapter of American history." I have now taken up the mantle from my uncle and have served as a Teacher Ranger Teacher at the Minidoka National Historic Site where I created lessons for other teachers to tell this story through primary resources. I have also worked with the Idaho Falls chapter of JACL to hold teacher workshops that train teachers who can then educate their students and honor the legacy of Minidoka. As noted by NPS, I believe that Minidoka should support Public Understanding, Education, and Involvement as an FRV: "Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today." This is why the placement of the wind turbines will be detrimental to the sacred story of incarceration, loss and the military service of those who gave their lives to defend our freedoms. The desolation will be replaced with a view of and noise from hundreds of extremely large wind turbines. The sacred way of honoring ancestors will be disturbed when JA individuals return to Minidoka on pilgrimage to honor their lost loved ones. It will also be heartbreaking for those incarcerees who are still alive and visit Minidoka. Their sacrifices and painful loss during WWII will no longer be honored. It will instead be interrupted by the disturbance of wind turbines that are larger than any in the state of Idaho. I ask that you, please, reconsider the location of this project. I realize that there is a need for renewable energy, but the placement of this project conflicts with the Congressional mandates of the National Parks to preserve the heritage of this sacred site. If you would not place four hundred giant wind turbines next to other National Parks and nationally-significant historic sites like Mount Vernon, then please, do not place it next to our historic site of healing. Thank you for considering my views.
11611-1	Teri Price	I am a resident of Boise Idaho but have read about the treatment of Japanese Americans during WWII and been aware of camps like Minidoka when we lived in Seattle WA and Oregon. After all that our country put the generations of our own citizens through during that time and in the decades since, to desecrate the spot that is now sacred to generations of those affected is horrible. This project would completely alter the historical site. It would change the future for those who want to learn from the history and those who share in that history. I urge you to reject this proposal and allow this Historial Site that is of National importance to be allowed to remain undisturbed. I join with other Idahoans to ask you to choose Alternative A and save this historic land for future generations to experience.
11612-1	David Monsees	urge you to adopt Alternative A (No Action) for this DEIS. Minidoka is an internationally known memorial for Japanese American community and Native American tribes who come seeking peace and solace in response to the unconstitutional incarceration of the many thousands of Japanese American citizens whose lives were destroyed and deaths were caused by this and other concentration camps supported by our government. The many huge wind turbines proposed by BLM's preferred Alternatives C and E would disrupt the search for closure of the many individuals come here. Not only would the viewscape created by these turbines be a violation of what the Japanese Americans desire, but also of the Native American tribes who also consider this land sacred (as well as stolen). This quiet memorial must be preserved so that this injustice which was continued after WW II, will never be repeated again for any other group of peaceful citizens. The annual pilgrimage to this site is witness to the multigenerational damage caused by such acts.
11617-4	Stephen Kitajo	Thank you for the opportunity to submit public comments regarding the proposed Lava Ridge Wind Project. My name is Stephen Kitajo, and I am a co-chair of the Minidoka Pilgrimage Planning Committee. I strongly oppose the Lava Ridge Wind Project and support Alternative A - No Action, with regards to alternatives presented in the associated DEIS. My maternal grandparents, along with many members of my extended family, were removed from their homes in Seattle and imprisoned in Minidoka, where my uncle was later born. I did not get to know my grandparents very well while growing up. My grandmother passed away before I was born, and my grandfather had an array of medical conditions that made it difficult to converse with him. He passed away when I was 8 years old. I never got to hear the story of their lives from them, so I turned to my mother for their story when I was older. It was then that I realized that she did not know the whole story of their lives either, particularly their lives in Minidoka, because they did not speak about it. While my grandparents chose to not share their Minidoka story, I could feel the importance and the weight of their story because of how much they avoided it. I first joined the Minidoka Pilgrimage in 2012 through their youth scholarship program. I joined with the hope of finding out more information about my grandparents, perhaps through a survivor who remembered them and would share some fond memories, or some documents that had survived from that era. While I did not find the memories and documents I was looking for, I did hear countless stories from other survivors about their time in Minidoka that helped me feel connected with my grandparents for the first time. I could imagine the similar stories and feelings that my grandparents would have had through the stories of their peers, and I was able to finally feel as if I could begin to know them as I stood on the site where they too may have once stood. I could look out across the landscape and see how empty it felt, imagining how they must have felt when they arrived as a newlywed couple facing an uncertain future ahead of them. My first Minidoka Pilgrimage began a process of healing and connectivity that continues to this day. I would not have been able to begin this process without the experience of the pilgrimage and the ability to travel to the site and be there surrounded by others on the same journey. The emotions that are felt as you walk around the site are evoked by the setting that surrounds you. The emptiness and isolation, the size and scope of the site's historical footprint, and the environmental conditions all play a role in the immense impact that Minidoka has. Completion of the Lava Ridge project would take all of that away. Minidoka serves many purposes beyond being a site of healing and remembrance for the Japanese American community. For the rest of America, Minidoka serves as a clear reminder of the dangers of prejudice, discrimination, and oppression that are possible when civil liberties are stripped from the people. To those from around the world, it is a chance to show how America is ready to confront its dark past to learn and move forward for a brighter future. Completion of the Lava Ridge project would not just take that away but would also be a clear demonstration that our nation has not learned from the past because it chooses to continue inflicting needless pain on communities that have already suffered enough. I support renewable energy initiatives, but I do not support them when they threaten sites of historical and cultural significance, like Minidoka. The Biden Administration, and many other previous administrations, have made commitments to the perpetual preservation of Minidoka for its cultural and historical significance. I expect these commitments to be honored. This does not need to be a showdown between renewable energy and preserving Minidoka. The proposed location for the Lava Ridge Wind Project is not the only location that a wind farm can be built at, but this is the only location that Minidoka can exist at. Wind projects can be built elsewhere; a site like Minidoka cannot, and should not, ever be built anywhere else. The BLM's preferred alternatives C and E are found to have "disproportionately high and adverse impacts" to the Japanese American community in the DEIS. Knowing these impacts, the BLM has still opted to mark these alternatives as preferred. Based on this, I question the BLM's priorities and their understanding of what Minidoka means to the Japanese American community. [...] I strongly oppose the Lava Ridge Wind Project and only support the No Action -Alternative A. I look forward to working with the BLM towards ensuring that Minidoka is protected for generations to come.
11618-5	Bif Brigman	Thank you for the opportunity to go on the record because I have a list of questions that remain unanswered since literally day one of this process. I have tried to reach out repeatedly with my questions and concerns. I have offered assistance and no responses. I'm sorry BLM staff don't like, or doesn't know how to respond - that doesn't make my questions any less valid or important for your Agency to address for this EIS process.it may actually make them more important since you are actively not recording or answering them. Why are you not addressing issues of the cumulative impacts from this and other projects? Why do you allow this shady and biased business of these billion dollar for profit companies not having to address any of the TOTAL impacts from their projects like they aren't connected to each other? Some of my most important questions relate to the cultural competency of Bureau of Land Management - staff, consultants and managers and their subsequent actions, decisions and priorities impacting the Minidoka National Historic site and Japanese American stakeholders. To date, everyone has appeared to be white. Everyone. The BLM track record on this EIS is a clear disaster on engaging the vast Japanese American community who have profound ties to Magic Valley. It really speaks volumes on the inability for BLM to successfully understand or engage this historically marginalized community with any depth. You are convinced you understand - but your actions and words tell me and others otherwise.

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		I don't see how can you possibly think you understand and realistically or adequately can assess the impacts on these communities you don't belong to? And yet some continue to drive a process when you clearly do not understand the communities you are impacting, at all, nor the harm you are visiting on them. This proposal, at this location, is actively inflicting harm and you are only in the planning stage. It is shameful that you are visiting harm and trauma on a community that the Department of Interior originally harmed and traumatized in 1942. I shudder to think how the tribes are being managed in this process. They too deserve much better. My apologies to them. As you check your boxes in your biased process, What y'all are missing is what about the harm that cannot be mitigated? What about the things that compensatory mitigation can't address for the harm that is being inflicted or the thing being taken? You expect people to comment on mitigation when no amount of money can replace what is being proposed here. We know you don't want us to see your grandma. But if we did, how much would you want? Your process is flawed and has been flawed since the beginning. Why did BLM say no to an area south of Twin Falls because of Sage grouse but thought it is just fine to impact the resources of one of the rare National Landmarks for Japanese Americans in the whole nation. And the only one in the state of Idaho. It's disturbing and shocking. Why won't you answer questions about what sorts of training Blm staffers have had when it comes to cultural competency? Why do you not require that from your consultants? Why can't you answer any questions about diversity equity and inclusion requirements for the Bureau of land management or policies that you are currently following as it relates to the subjects? Why is it not reflected in the EIS? Having y'all deciding what is and isn't Environmental justice is a total farce. Y'all need to do better. Much better. Why won't BLM address the numerous presidential proclamations and executive orders that specifically address issues of environmental justice and not impacting historically, marginalized, ethnic communities? Why? Why were no materials produced in Japanese language for non-English speakers who are associated with the Minidoka national historic landmark why were no ethnic newspapers, or other media engaged in the outreach efforts of BLM? Why was there no Spanish language translations of materials and notices? Spanish is the next most spoken language and NOTHING, Again massive failure of cultural competency and BLM. I also would like to know what formal process BLM has for addressing formal complaints against your biased EIS and especially the open house process and "outreach" - including signage, biased and selective posted options, location, timing and , the overly chummy relationship between the energy company proposing this project and your staff people? https://youtu.be/14MdgztuaP0 Alternative A is the only just and right decision.
11619-1	Gwynne McElhinney	As a lifelong resident of this state, I oppose the plan to build the Lava Ridge wind farm on the public lands that have been selected. As you well know, the proposed project would put up to 400 wind turbines on about 118 square miles, making it Idaho's largest wind farm to date. The recommended site includes land near the concentration camp where more than 9,000 Japanese Americans were imprisoned during W.W. II. With good reason, people say this development endangers the Minidoka National Historic Site, which commemorates the thousands of people with Japanese ancestry who were ordered by the U.S. government into prison camps around the country starting in 1942. Pre-pandemic, my husband and I joined dozens of other interested citizens from Treasure Valley and took a field trip to the Minidoka National Historic Site. This educational tour was sponsored by The Osher Lifelong Learning Institute at Boise State University. Given the gravity of the experience, I remember being overwhelmed by emotion and crying on the bus trip home. Tonight, my husband and I joined a large crowd of concerned Idahoans at BSU's Albertsons Library. We attended an excellent, eye-opening presentation, one in a month-long series of lectures associated with the exhibit from of the Holocaust Memorial Museum which traveling across the nation to only 50 selected university libraries. Tonight's program was described as a Screening and Panel Discussion of the 2022 film Betrayed: Surviving an American Concentration Camp. Told through the voices of survivors of Minidoka, this 60-minute documentary explores the suspension of civil liberties during W.W. II, the long-lasting impact incarceration has on the Japanese American community, and the rise of Japanese American activism in defense of the rights of others. During the second hour, Kurt Ikeda, Director of Interpretation and Education at Minidoka, and Minidoka Camp survivors Mary (Tanaka) Abo and Karen Hirai Olen, shared their personal insights, especially about the relevance of this story today. Each of them agreed that Minidoka should become an international Site of Conscience. In case you are unfamiliar with this concept, a Site of Conscience is a place of memory - such as a historic site, place-based museum or memorial - that prevents this erasure from happening in order to foster more just and humane societies today. Not only do Sites of Conscience provide safe spaces to remember and preserve even the most traumatic memories, but they enable their visitors to make connections between the past and related contemporary human rights issues. There is only one Minidoka National Historic Site. There are hundreds of thousands of acres of public lands in Idaho. Please go back to the drawing board and relocate the wind farm so that this sacred space can be preserved forever. There really can be no other outcome that is acceptable. As Elie Wiesel said we must remember the lesson taught by the Holocaust: never again. And that applies to incarcerating innocent American citizens under any political pretext.
11622-2	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	We support the Biden Administration's commitment to environmental and racial justice, the Department of the Interior's goal to tell the whole story of America, including the wrongful incarceration of Japanese Americans and Alaska Natives at the Minidoka concentration camp, and Minidoka's Congressionally-directed purpose: The Secretary shall interpret— (I) the story of the relocation of Japanese Americans during World War II to the Minidoka Relocation Center and other centers across the United States; (II) the living conditions of the relocation centers; (III) the work performed by the internees at the relocation centers; and (IV) the contributions to the United States military made by Japanese Americans who had been interned. We support President Biden's leadership to acknowledge the painful chapters in our nation's history, such as the Tulsa Race Massacre. His remarks at the 100th anniversary of the massacre resonate with Minidoka survivors and our community's experiences: For much too long, the history of what took place here was told in silence, cloaked in darkness. But just because history is silent, it doesn't mean that it did not take place. And while darkness can hide much, it erases nothing. It erases nothing. Some injustices are so heinous, so horrific, so grievous they can't be buried, no matter how hard people try … only with truth can come healing and justice and repair.
11623-1	Monica Lundberg	I work at South Seattle College, and have attended the annual pilgrimage to the Minidoka National Historic Site three times. Each year on our campus, we recall the injustices of Executive Order 9066, by inviting speakers to talk about the historic site and encourage our students to visit. Having personally met survivors of Minidoka and their family members at pilgrimages, I can understand how this project would completely diminish the experience at Minidoka National Historic Site in numerous ways. The DEIS needs to adequately protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit. The DEIS needs to recognize the importance of the cultural landscape and preserve the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience. The Japanese American community has worked hard to heal from this trauma and reclaiming Minidoka is part of that journey. This project would completely distract from the historic nature. After having experienced gross violations of civil liberties, our country especially needs to listen to the voices of the Japanese American community. Don't pour salt into the wounds!
11624-1	K.C. Potter de Haan	The Minidoka community of survivors and descendants deserve the respect and acknowledgement of this gross historical violation of civil liberties by our nation's government through the preservation of the site. The Minidoka story must be recognized and treated in an honorable and somber manner as other painful events in our nation's history. The proposed Lava Ridge project minimizes the trauma, loss, and humiliation suffered by Japanese Americans based solely on their ancestry. I request No Action.
11628-2	Margaret Sekijima	I am a US citizen, 3rd generation Seattle resident, 72 year old woman, retired nurse practitioner, proponent of green energy and Sansei third generation Japanese American. I write in protest of the proposed Lava Ridge Wind Project which deeply disrespects Minidoka and the intended legal protection conferred by its designation as a National Historic Site. Both my parents were high school juniors when they and most of their respective families were incarcerated at Minidoka in 1942. Their public school education, the integrity of their families and community were destroyed by Executive Order 9066. My grandfather has his business permanently confiscated, the civil rights of Japanese Americans were violated, as was their personal self esteem and trust in the America they valued so highly. Ironically, my father was drafted into the US Army in

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		1944, and was assigned to the Military Intelligence Service which is credited with ending the war more quickly than it would have been otherwise. My family dutifully carried on with their lives after the war and accomplished much. However, all carried unseen psychological scars for the remainder of their lives, and to continue the process of healing intergenerational trauma (https://psycnet.apa.org/record/2021-05763-007). When I return with the Japanese American community to Minidoka on our annual pilgrimage, it's to honor the memory of those who suffered the indignity of incarceration, and to gather strength to speak out for others who have had their rights wrongfully violated, or who are currently experiencing some form of that injustice. I am deeply offended by the authors of the proposed BLM EIS who categorized the survivors and descendants of incarcerated Japanese Americans as tourists or recreationalists, dismissing out of hand the effect of these wind turbines on our pilgrimage. They will intrude physically and psychologically like so many towers of armed guards who peered down on the incarcerated. The BLM authors reveal a willful ignorance of well-documented history, culture and our community work of healing and educating. Likewise, to give the same designation to Native American peoples of Idaho and surrounds is unconscionable. Members of Shoshone Nation and other Peopnle will not be on tour or vacation as they pay respects to their rightful homelands, sacred sites and centuries of ancestral injury. People with much less power than the BLM would not think or articulate such disrespect. I understand the stated mission of the BLM is to enhance the quality of life for all citizens by the wise stewardship of our country's public lands and resources. Thus I urge you make decisions with the knowledge that culture, history and the whole health of people also constitute a significant part of our national resources. Do reject the Lava Ridge project proposed by New York developers. Do put BLM resources to work to relocate this project away from protected historical, archeological and cultural sites. Do act to establish your credibility as a culturally sensitive Department of the US. Do not allow construction of any project which intrudes on any portion of the viewshed of the Minidoka NHS or the White Buffalo Cave cultural site. Do not pit the Japanese American or Native American communities against sustainable energy. I fully support that effort, but not the current Lava Ridge proposal when other With respect and thanks for considering these comments. sites exist, albeit perhaps at loss in profit to the New York investors. With respect and thanks for considering these comments.
11630-1	Cooper Brossy	Dear BLM, I am concerned about visual impacts to Minidoka NHS from all the proposed alternatives that involve construction of wind turbines. Any additional visual impacts to the Minidoka NHS further desecrate this important piece of American History. We all need Minidoka NHS to remain a place where we can reflect upon our past and teach our children about injustice, prejudice, and racism by maintaining the desolate and remote feeling of the place. Adding tens or hundreds of symbols of modern technology to the horizon or looming over the site alters the feeling of the place in a way that I cannot support. I support Alternative A (No Action). Thank you for your consideration.
11632-1	Karen Ko	o not permit the development of the Lava Ridge Wind Farm. It would desecrate the site. There are places that deserve to be preserved as close to their original form as possible. They can teach us in ways nothing else can about injustice. Minidoka is such a site. My father and his parents were there and in their names I have to officially register my deep dismay that once again, the Japanese Americans who were incarcerated at Minidoka are treated as less than.
11644-1	Page Bridges	I know how much this threat to their remembrance and annual pilgrimage site is upsetting the Japanese camp survivors and their families. I am dear friends with some of them and I am asking you to respect their dignity and what they went through. I am a witness to
11652-1	Natasha Varner	As an organization dedicated to preserving Japanese American World War II incarceration history, we at Densho urge you to select “Option A, No Action” in regards to the proposed construction of the Lava Ridge wind farm adjacent to the Minidoka National Historic Site. We share the concerns of many WWII incarceration survivors and descendants in our community surrounding the disruptive impact of the Lava Ridge project, as currently proposed, on the Minidoka historic site. We’ve outlined below a few of our key concerns: ● Minidoka is one of the few federally recognized sites of Asian American history in the United States and it is essential that it be protected as a place for learning and healing for future generations. The proposed wind farm would gravely jeopardize the viewshed and solemn nature of the site. To illustrate this point, we ask that you consider the prospect of a project like Lava Ridge adjacent to 9/11’s Ground Zero, or to the Arlington Cemetery. Even if these sites were located in rural areas, it would be unthinkable to desecrate them with a project that is the size and scope of Lava Ridge. To survivors of WWII incarceration and their descendents, Minidoka holds the same somber significance that Ground Zero and the Arlington Cemetery hold for some members of American society. We demand that it be respected accordingly.
11661-1	Sam Kito Jr.	The Kito family supports Alternative A, the no action alternative, [...] Background: In the early 1900s, my father, Saburo Kito, (Sam, Sr.) settled in Petersburg, where he met my mother, Amelia (Okegawa). Her mother was Tlingit and father was Japanese. Along with the Kito and Okegawa families, Petersburg was home to the Kawashima, Ozawa, Kaino, Komatsubara, Ohashi and Oyama families. Following the attack on Pearl Harbor, when I was five, my dad, his brother Tom, and my Grandfather Iwataro (Harry) Okegawa were taken from our family and incarcerated in Lordsburg, New Mexico. We didn’t see my father for over two years. My mother was left in Petersburg with myself (age 5), my sister Barbara (age 3), my brother John (age 1). Since my mom was without her father or husband we traveled by boat to Seattle and later to Puyallup Fairground. My brother Harry was born in a hospital in Tacoma, while we were incarcerated at Camp Harmony. At Minidoka, we lived in Block 24, with other families from Alaska. After the war, we lived at the Anderson Dam construction site, near Mountain Home, where my father worked. Later, my brother, Harry, and I served in a Cold War electronics training program for Alaska Natives and participated in a White House ceremony with President Kennedy, Sec. Stuart Udall and Sen. Ernest Gruening, Senator for All Alaska. Harry later joined the Marines and was killed while serving in Vietnam. The Kito family is proud of his service to our nation and grateful that the Alaska legislature named a bridge near Petersburg as a fitting tribute to honor his life and service to our country. The Minidoka National Historic Site is sacred ground to our family, because of its connections to my brother, my mom and dad, and Japanese Alaskans from Southeast and across the state. Speaking as a Marine Corps Veteran, I can say that siting the Lava Ridge wind project against the backdrop of the Honor Roll will dishonor the military service and sacrifice of the 73 men from Minidoka, who gave their lives to defend our nation’s freedom during World War II, and Minidoka’s 73 Gold Star families. In addition to honoring the military service of Japanese Americans who fought during World War II, Minidoka is a place to honor the service of my brother Harry and other Minidoka survivors and descendants.
11667-7	Alisa Bowman	Concern: Historical Sites

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		Minidoka National Historic Site would be impacted by this project and not in a positive way. Please honor the history of this are and the residents that lived here by preserving the area. Do not allow LS Power to desecrate this site by the visual impact that would be imposed by the towering structures.
11672-1	Teiko Saito	I am one of the few remaining survivors from the World War II Minidoka Japanese American War Relocation Camp. Not only was I born in the camp in April of 1943, but my mother, an American citizen, died in the camp when I was only 1 year old. Because of the racial injustice inflicted upon Japanese American citizens along the West Coast during World War II, I never had a chance to grow up with and know my mother. And because Minidoka was the place where she spent the last two years of her life, I consider ALL of the historic footprint of Minidoka to be sacred and hallowed ground. My personal connection to Minidoka runs deep and is multifaceted. Not only have I participated in two past pilgrimages to Minidoka, attended by internment survivors and family descendants, I also intend to go to other Minidoka pilgrimages in the years to come and have my nieces and nephews accompany me so they too can learn about this unjust treatment of Japanese Americans during World War II. I should note that it was during my second pilgrimage to Minidoka that I was finally able to connect with my mother and find peace with her death. In addition to the annual pilgrimages, I have made yearly charitable donations to the Friends of Minidoka and have that non-profit organization in my will. In addition, I have donated to the National Park Service at Minidoka National Historic Site a primitive doll that my mother made for me out of the scarce resources she could collect in the camp. Finally, I have made a number of significant charitable donations to the Friends of Minidoka to assist in the campaign against the proposed Lava Ridge Wind Project. After reviewing the various alternatives that BLM laid out in its Draft EIS for the proposed Lava Ridge Wind Project, I am submitting the following comments on the Draft EIS on behalf of myself and 11 other members of my family, including my brother, who is also a survivor from Minidoka, and two generations of his descendants: [...] • Given the Secretary ofInterior's statutory obligations to protect units of the National Park System from harm and to leave them unimpaired for the benefit of future generations, it is our view that the BLM must exercise its discretionary authority under the Federal Land Policy Management Act (FLPMA) in such a manner as to shield the Minidoka National Historic Site and its viewshed from adverse environmental effects and degradation. Unfortunately, the best identified Alternative in the DEIS that accomplished that statutory obligation (Alternative A) was rejected by BLM in the DEIS, a decision which I believe is contrary to the Secretary's statutory obligations for the National Park System. I would, therefore, urge BLM to go back and reconsider this decision and adopt Alternative A in its Final EIS and Record of Decision. [...] Regarding the various project Alternatives set out in the DEIS, again I endorse and incorporate by reference the Alternative analysis set out in the comments submitted by Friends of Minidoka and NPCA among others. I am particularly disappointed that BLM dismissed Alternative A outright as a non-starter. The Friends of Minidoka and NPCA comments and analysis lay out cogent reasons why this should not be the case. And while Alternative Eis significantly better than Alternatives B, C or D, it still falls short of avoiding adverse impacts and harm to Minidoka and its viewshed, as should be the case for a unit of the National Park System and an area that is eligible for inclusion in the National Register of Historic Places. Thus, Alternative A, the No Action Alternative, is the only one that I can recommend BLM to adopt in its final Record of Decision.
11681-1	Glenn Glass	The proposal to build the wind farm at Lava Ridge diminishes my experience at Minidoka Historic Site in this way: At the time of incarceration of American citizens, the area was barren with light agricultural activities and with industrial scale structures nearby, it will be very hard to imagine what the prisoners experienced and why it should never be allowed to happen again.
11696-1	Rebecca Morgan	Please do not put up windmills at Minidoka! We have friends whose relatives were incarcerated at Minidoka during World War II. This is not just a tourist site! People who were American citizens, who had committed no crimes, were incarcerated here, and their lives were forever changed. We need to respect this, and the people who visit this site. This is a place for meditation and reflection, not windmills! Please put the windmills somewhere else, where they are not visible from this site. Would we be putting windmills up by any other serious American historical site?
11738-1	Rita Takahashi	I am responding to the U.S. Department of Interior, Bureau of Land Management's January 2023 statement titled "Lava Ridge Wind Project: Draft Environmental Impact Statement." For reasons I stated in my prior letter to you and BLM, I am opposed to the construction and maintenance of wind turbines in and around the areas that were once the Minidoka War Relocation Authority camp. The area is of great historical significance, and those affected by the U.S. Government's exclusion and incarceration orders are opposed to developments (including wind turbines) that infringe upon and alter the original grounds. I ask that BLM take the right course by respecting and honoring what the area represents to so many. I urge the adoption of Alternative A, as specified in BLM's impact statement: "Alternative A – No Action, in which the BLM would not authorize construction, operation and maintenance, and decommissioning of the project." Your affirmative action in adopting Alternative A will be valued and appreciated.
11741-2	S. J. Arima	I select Alternative A. Take NO ACTION. No Wind Farm on or near The Minidoka National Historical Site. My American born Mother and her then five siblings (initially the oldest was but years old, and the two youngest could not yet walk)were incarcerated at Minidoka, after being confined at the Puyallup Assembly Center. As a Descendant and as a Survivor, I have participated in five organized pilgrimages to Minidoka. In doing so, I reflected on the mental and physical hardships imposed on my Family by Our Government. In remembrance of the injustice imposed, I feel closer to my Family and seek healing for them and myself. There exists trauma from the forced relocation, confinement, and denial of rights as native born citizens. Minidoka Pilgrimages help reduce the passing of trauma to following generations. My Father was the publisher and editor of a bilingual newspaper, with circulation throughout the Northwest. He was physically arrested on December 7, 1941 as an enemy alien. Having immigrated as a teenager, he was a US resident for over 20 years. Fatheralong with all others of Japanese ancestry, was not eligible to seek US Citizenship. He was separated from his wife and children. Bank accounts were frozen, and his publishing business was forced to close by Our Government. The loss of freedom and the mental stress of not being able to care for his Family was worse than the loss of assets. Only until August 1944 did Our Government reunite my Parents and Siblings. They were incarcerated at an Enemy Alien family facility in Crystal City, Texas. Our Government had more selectively incarcerated Germans and Italians for incarceration there. South Americans of Japanese ancestry were forcibly removed from their countries of residence and held captive at Crystal City as well. I am the product of my Parents' Crystal City reunion. After the incarceration, my Father remained largely stoic and did not talk of his treatment , or of the loss of his business. He worked long hard hours with only my Mother's companionship and assistance. Their earnings were little, but he had regained his freedom and did not have to take orders from others. He raised his children to be educated loyal Americans. Two of his sons volunteered for military service (I am a Vietnam veteran.) and a third son was medically rejected and had a civilian career with the Department of the Navy. Whenever I inquired my Mother about her life in Minidoka, her response was succinctly : " I was the old woman in the shoe, who didn't know what to do ". Almost daily she by hand laundereddiapers and clothing, often under extreme temperatures and dust conditions. She cared for her children without any of her relatives nearby to assist her. When I go to Minidoka, I find it a safe place to reflect on what affect Our Government's actions had on my Family and myself. In turn I reflect on the impact on others then, now, and in the future. Such an injustice should not be allowed to be repeated. We must not forget. We must educate others. We need a safe place to remember, a safe place to seek healing, and safe place to share. Minidoka should be a place for all to gain strength to prevent the unjust treatment of others. The Minidoka Historical Site is just a very small piece of what made up the wartime facility. It has taken effort and fundraising to assemble what is the current site. This site should not be surrounded by a visual pollution of noisy turbines that are taller than Seattle's Space Needle. People's thoughts should not be interrupted by the activity of wind farm construction, operations, maintenance, and repairs. The push by others to infringe on the Minidoka Historical Site is an added hurt to Survivors and their Descendants. A grave injustice was placed on those of Japanese Ancestry during World War II so that others could gain economically. One might

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		consider the wind farm proposal an effort for history to repeat itself. A huge feedlot had been proposed. Minidoka would have been down wind from the feedlot and be subjected to fowl smells. It took much effort to have the feedlot location rejected. When groups gather near the Honor Wall and Guard Station, the peaceful dignity is often interrupted by vehicles and farm vehicles passing by on the entrance road. I had been hoping that sometime in the future that the road could be relocated to the other side of the canal. A wind farm would be a huge distraction. [...] Do Nothing - No Lava Ridge Wind Farm.
11748-1	Robert Peshkin	The Minidoka National Historic Site will be impacted and it's significance will be diminished as the context of it's isolation will be destroyed. This site is of vital importance to the lessons of American and human history. The wind turbines will also be visible from Craters of the Moon National Monument and Preserve and the adjacent designated wilderness area thus destroying the visual resources which are an important part of those sites.
11750-1	Eugene Tagawa	My name is Eugene Minoru Tagawa. I am 80 years old. I am the son of an immigrant Japanese father and an American-born Japanese mother. I was born in June 1942 while my parents and two infant sisters along with my maternal grandparents were confined at the Puyallup Detention Center near Seattle. From there, in August of that year, we were taken to the Minidoka WRA camp in southern Idaho. There we spent the next three years along with 13,000 other people of Japanese ancestry. I speak also as a member, since 2009, of the Minidoka Pilgrimage Planning Committee. We are an all-volunteer group that has been organizing an annual pilgrimage to the Minidoka National Historic Site since 2003. Begin- ning with my first Pilgrimage in 2008, I have seen and felt how important it is for visitors to be able to walk the dusty ground and feel and breathe the air of this place where thousands of innocent, mostly American citizens were incarcerated. While we are immersed in this landscape, we can feel the remoteness and isolation of this place so different and distant from our homes. We can better imagine what it was like for our families, our predecessors, who were confined here not knowing how long they would have to stay. The experience of being at this place changes and enriches the lives of so many who travel here to reflect and connect and to become more appreciative and empathetic of those who suffered, endured and survived. It is a sacred place for all to learn and heal. The Lava Ridge Wind Project would have a significantly negative effect on the unique ambience of the Minido- ka National Historic Site. Hundreds of 700-foot wind towers with rotating blades spread across a wide swath of the view would be visible to visitors seeking view the horizon as Minidoka incarcerees saw it. To connect with the past. For our ancestors, for present day visitors, for future generations - please protect this culturally important place. I urge you to consider Alternative A, No Action Thank you.
11753-5	Mary Rios	Another issue I have with the location of this wind project is that it will be placed on the Minidoka National Historic site that includes the Minidoka War Relocation Center. On page 226 of the EIS statement, it states "The project could adversely affect Minidoka NHS's ability to convey its association with 1) the Japanese American incarceration experience and 2) the site's contribution to southern Idaho's agricultural history and development. The openness and undeveloped landscape are vital to the historic character and purpose of Minidoka NHS. These defining characteristics—expansiveness, remoteness, high desert, and agrarian terrain—convey the government's site criteria and the long-lasting effects of that intentional decision making process." The Japanese Americans have raised many concerns about this project. Putting a bunch of metal wind turbines on this land would not be honoring them. On page 228 it states "The Japanese American community has expressed that no mitigation of project impacts could protect the site from the intrusion and desecration of, what to the community is considered, a sacred site. The Japanese American community would like to see the project located at other sites that would not impact Minidoka NHS rather than in the currently proposed area (BLM 2022). The NPS has recommended that measures to avoid, minimize, or mitigate adverse effects to Minidoka NHS consider the visitor and survivor experience in relation to the historic integrity of the site (NPS 2021). Although project infrastructure was set back from Minidoka NHS during project design, and action alternatives were developed with the intent to further minimize non-physical impacts to Minidoka NHS (MVE 2022:C-3.2.2; Section 2.4), non-physical impacts would not be fully avoidable." For these reasons, The BLM needs to choose the no build option A.
11760-1	Joanne Egashira-Kitajo	Imagine being over 20 years old and knowing your parents and family, but not knowing ABOUT them- their life, their experiences that shaped their lives and their opinions. My parents did not share much about their lives after they were married; everything I knew was in bits and pieces. I knew my mother grew up on a dairy farm in Skagit Valley, Washington, and my father lived near what is now Beacon Hill and went to Franklin High School. When I was in my 20s, I was concluding my education at Seattle Central Community College (SCCC). 1981 was a pivotal year for me, because in the SCCC auditorium, an array of speakers on the subject of redress shared their experiences of being relocated. This was my first in depth look at the events that I believe shaped my parents. The economic losses, families torn apart, questions of loyalty, questioning their own government and their so-called rights. I went to every opportunity over the course of 3 days to hear the stories of these speakers. They shared experiences, and impact not only for the Japanese Americans, but the Japanese Peruvians and Aleuts, and those related by marriage. What?? I knew a little about the relocation and camps, but not the Peruvians or Aleuts. Who were they, and why were they relocated? I certainly didn't remember learning about this in school. My interest in these experiences grew, and I read and learned all I could about those times. My parents still didn't say much about it. That summer, I went on a pilgrimage to Tule Lake with my cousin, where we experienced some of what these people must've felt, seen in our own eyes some of what they saw, and explore Japanese American culture with others. Almost forty years later, my husband Scott and I have two wonderful children. Like many parents, we tried to raise them understanding where they came from- their families, their culture, their history. From infancy, this meant we went to Bon Odori where we shared food, music, dance, taiko, and good times. We shared what we knew about relocation and concentration camps, and how experiences shaped us. They gifted us with an experience to the Minidoka Pilgrimage. They knew it was something I always wanted to do, and Scott was also wanting to learn more about the concentration camps. This was the first time for us to visit Minidoka- where my eldest brother was born, where my parents spent their first years of marriage, where I hoped to gain a better understanding of my parents. I couldn't go to them with my questions, my mother passed away in 1981, and my father and I didn't talk much. Nothing could have prepared me for the long drive. I can't imagine living or traveling in the heat of the summer or the freezing cold of fall and winter. Going over the terrain with closed windows, not only to not know where exactly where you were going, but how you got there. No maps here, just the clanking of the rail tracks as they traveled through the night, and during the day with the shades pulled down. The vastness of the land was a visual not obtained in a picture in a textbook. It seemed as though there was nothing for endless miles. Can you imagine going to a place like this? Basically little but rock and dirt. The terrain was nothing. except the guard towers. Those were the only landmarks in the horizon. Was that really necessary? How would/could anyone escape from here with no place to hide? These people could not have posed much of a threat. Looking up from the ground, the guard towers may not have been very high, but very intimidating. There was, however, a spiritual closeness that allowed me to understand a little more about my parents, what they must have experienced, what shaped them, my roots, and the teaching of future generations.

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		Building the Lava Ridge Wind Farm near the Minidoka site should not be allowed. Please do not build it here. My family and countless other citizens were wrongfully imprisoned here during World War II. This sacred land should be preserved as a reminder of the grave injustice done to the community, and citizens of the United States. This site will allow the teaching of future generations of the harm when civil liberties are violated. Please choose Alternative A- No Action, while working to find alternative solutions to preserve the nature of this land while promoting renewable energy alternatives. Future generations, and I thank you for your attention to this matter.
11761-2	Carolyn Firth	For the reasons I have stated above, I urge you to choose Alternative A. I appreciate any consideration you may give to my concerns.
11762-1	Kristine de Leon	As a concerned citizen, I wanted to voice my concern and opposition to the construction of the Lava Ridge Wind Farm at the Minidoka National Historic Site. Minidoka is historically significant because it was where Japanese Americans were unlawfully incarcerated during World War II. Please protect this important site, honor our nation's history, and do not permit this project to proceed by choosing Alternative A - No Action from the Draft Environmental Impact Study.
11764-1	Blaine Campbell; City of Eden	3. This area has significant historical value as home to the Minidoka internment camp which is a part of our collective heritage that should remain unmarred and as a memorial for all people to remember the tragedy that happened here. When people visit the internment camp and the visitor's center there is almost a sacred feeling about the place. When people visit here they like the quite solitude to reflect up on this place and what happened here.
11766-1	Robert Malae	As a stakeholder in this project site, I oppose the proposed Lava Ridge Wind Project primarily because of the adverse environmental impact it has on the neighboring site where the Federal Minidoka Incarceration Site ("Minidoka") is located. As the draft Environmental Impact Statement ("EIS") indicates, the scope, scale and physical footprint of the project are enormous and expansive: 197k acres; up to 400 wind turbines; and almost a mile wide. The Minidoka site is important to me. Minidoka has significant historical, physical, cultural and human significance to Japanese Americans and individuals of Japanese ancestry. This proposed Lava Ridge Wind Project ("Project") will adversely impact and adversely affect the physical, cultural, human and wildlife environments of the landscape. Mitigation of the Project's impact is not adequate. The physical presence of the turbines and associated infrastructures will cause irreparable harm to the aesthetics and peace because of the sight, presence and noise levels of the project. Additionally, the alternative plans C and E do not appropriately mitigate the irreparable harms in aesthetics and noise levels that will adversely impact Minidoka. The findings under Public Law 100-383 acknowledge the injustice of the incarceration (see The Congressional Commission on Wartime Relocation and Internment of Civilians and National Archives). This Commission determined that EO 9066 and all of the government actions that stemmed from it were based on lies. Additionally, the Commission noted that EO 9066 and related actions were caused by racism, wartime hysteria and failure of political leadership. See Public Law 100-383. (See also the attached statement from President Joseph Biden.) While life stories of Minidoka include the incarceration of over 9,000+ individuals and their families, Minidoka also encapsulates the collective trauma from the wrongful incarceration of over 120,000+ individuals—men, women and children of Japanese ancestry—in multiple incarceration sites across the western, continental United States. This is not only significant to Japanese Americans but all Americans. These lived experiences and intergenerational trauma at Minidoka continue today. Pilgrimages to this site—as well as other historic incarceration sites—continue today and for future generations of Americans. I plan to make a pilgrimage to Minidoka and wish to preserve the environment near Minidoka for all Americans to experience—in its undisturbed state— to remember, heal, and inspire future generations of Americans to uphold civil rights. This is a key opportunity for the Federal government and its executive agencies to get this right. This EIS should properly document the adverse impacts on America's significant cultural and historic landmarks, and the grave responsibility of federal agencies like the BLM to steward the land—and its stories—including natural resources both properly and reverently.
11767-1	Rita Alcantara	Please protect Minidoka National Historic site as it is a part of American History with lessons our country and world still, sadly, need to learn. Land on which my uncle was born and where people even died after being unjustly incarcerated should be preserved so we do not repeat this treatment of Americans ever again. I was hoping to bring my children there to learn about this important part of our history and urge you to protect it for generations to come.
11768-1	Polly Shigaki	My name is Pauline (Otani) Shigaki, direct descendant of Minidoka incarcerees, also married to a 79 year old survivor. I hope my comments will convey deeply held emotions and careful discernment in total opposition to the draft Environmental Impact Statement (DEIS) for the proposed Lava Ridge Wine Project in Jerome, Lincoln, and Minidoka Counties, Idaho. I wish for BLM to record that I am in favor of Option A – No Action. My parents were among the more than 13,000+ Japanese/Japanese Americans forcibly-removed and unconstitutionally imprisoned at Minidoka American Concentration Camp for approximately 2 ½ years. My mother, Mitsuko Murakami Otani (prison # 12188E) entered with her Issei (first generation) parents and 10 siblings, 3 of whom were married with infants and toddlers. My grandparents remained incarcerated until Minidoka closed and returned to Auburn, WA. My father, Seigo Otani (prison #11122A), lived in Block 30 with other single men. They entered as unmarried adults, were introduced and married in April 1944. As Dad was helped to secure employment as a baker, they bravely relocated to Cleveland, OH, where I was born in July 1945, before returning to Seattle in 1949. With the timing of Commission on Redress hearings, 3 Yonsei (4th generation) teenage granddaughters began deep probing/questioning in interviews to gather family history and stories. Neither grandparent had spoken negatively of their hardships, assumed postures of cultural Shikata ga nai – "it can't be helped" and Gaman – "bearing the unbearable with dignity." They clearly experienced anti-Japanese incidents -sentiments, but in attempting to be seen as 110%+ American citizens as I grew up, they silently endured and persevered with cheerful stoicism and resiliency of Spirit. The now well-researched concept and effects of generational trauma being transferred to subsequent generations was yet unknown. I am still learning about the negative psychological effects of incarceration embedded in my DNA from Donna Nagata's 2021 "Forever Foreigners" study, and earlier Sansei Study. Approaching age 78, while very proud to be an American of Japanese Ancestry, I still grapple with self-loathing, being viewed as a 2nd class citizen, and I still fear "looking like the enemy" in our hate-filled climate of anti-Asian, anti-BIPOC and anti-LGBTQIA+ violence. It was only after retirement that I had the opportunity to make my first Pilgrimage in 2014. Since then, I have been on Pilgrimage four times with family members and others to the sacred 70 acres (of original 33,000 acres) at Minidoka National Historic Site. However, my soul holds all the overwhelming emotions and flood of remembrances of that first visit, coming as a living witness among survivors, descendants and fellow seekers. I felt the Spirits and Legacy of my Issei grandparents, parents, and relatives, recalling the trauma and humiliations suffered and endured – whispering in the hot wind and swirling dusty air. This once desolate, isolated site intentionally chosen to imprison my community, is now an important place of solace and quietude, where peace and deep healing occurs as pilgrims gather and reunite. It is imperative to protect and preserve the viewshed and cultural landscape of Minidoka's hallowed grounds from desecration by the overwhelming project scale that fails to protect the integrity and sanctity of the Minidoka site. An important aspect of my post-retirement ministry as an ordained Vocational Episcopal Deacon now assigned to historically Japanese American St Peter's Episcopal Parish (Seattle, WA) has been to annually preach about the effects of EO 9066 on St Peter's - her entire community forcibly exiled like the Israelites into Egypt and her doors closed for more than 3 years; regularly educate through personal stories of our few living survivors and descendants; and continually provide information about the increasingly vast repository of incarceration resources. Since 2017, I have also invited and accompanied new Pilgrim Allies as they experience Minidoka Pilgrimage firsthand – including my former Bishop/wife, my Rector Rev. Edmund Harris, parishioners, Deacon colleagues, Priests and friends. These

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		new co-conspirators are almost all Caucasian, having moved to Seattle-West Coast for jobs and college. Unless they had family directly affected by EO9066 and heard difficult stories about the incarceration, the majority were never exposed to or learned anything beyond the sanitized, cursory 1-2 sentences in our History textbooks. The experience of walking the sacred ground as pilgrims together while simultaneously listening to the personal stories of Minidoka survivors has very powerfully impacted and educated many Allies. As they have all become woven into the threads of the Minidoka Story - our American Story – they help me to widen the circle of witnesses to honor the cultural resilience and perseverance of Japanese Americans by bringing more hidden stories into the light. The following is the powerful refrain repeated during St Peter's "Prayers of the People" for our annual Remembrance of the signing of EO 9066 February 19,1942 – Help us to Remember, Help us to Listen, Keep us from Forgetting.
11774-1	Caroline Morris	My comments about the proposed project follow. I am an Idaho resident who regularly visits Minidoka National Historic Site (Minidoka NHS). This former Japanese American incarceration center has profound social justice and spiritual implications for me and many other visitors and supporters, most importantly the former incarcerees and their families. The visual and emotional impact of Minidoka NHS's potent visitor center in its quiet rural setting would be destroyed by constructing the Lava Ridge Wind Project (Lava Ridge), which proposes installing 400 wind turbines each 740' tall. These massive towers would have significant negative social and environmental impact, by both creating unwelcome atmospheric noise and destroying the Minidoka NHS rural view shed that would ruin the current peacefulness. The remote Minidoka NHS surrounding area should not be industrialized and diminished culturally for the benefit of LS Power. Locating an industrial wind project in this location is socially and environmentally irresponsible. I favor the No Action Alternative for Lava Ridge. I do support the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC) to protect Minidoka NHS's viewshed, along with other cultural sites, recreational access, migration corridors, wildlife, pollinators, and other values. However, I have experienced BLM's unwillingness to devote adequate resources for monitoring other ACECs.
11782-1	Ken Fitch	The location of this major project adjacent to Minidoka National Historic Site raises a wide range of issues, in addition to the other impacts of such a massive project. Re Minidoka NHS, some of the accounts of the forced removal and placement at this location are marked by hostility and racism endured by those who were taken to this place and these strong feelings and wounds are reopened when further actions of disrespect occur. The recognition of Minidoka as a National Monument and a National Historic Site, in addition to official actions such as the Civil Liberties Act of 1988, and statements by at least 7 of the most recent Presidents of the United States of America have brought acknowledgment, apology and reordering of perceptions that take a path toward healing. This historic location has also become a place of healing for former residents, but also current visitors and citizens with a rededication to eliminate such attitudes and actions that took extreme form here. If one has seen the Minidoka National Historic Site film, it is very difficult to accept and any further disrespect to this community. In this regard, there is great sensitivity about any action that diminishes this ongoing sense of healing and rededication with any action that diminishes this in any way. And certainly, a bold action such as this galvanizing major attention to an intrusive infrastructural presence would also seem to divert attention from the history here. The application of such a project may bring a sense of some awkwardness, given the purpose in the current global crisis to reduce the threat of global warming and climate change, but of equal importance and concern, when interconnecting cultural experience is a factor, is that at this special historic location we learn the essential lesson that racism and target of others, is a particularly insidious thread of harmful activity now in the world. It might conjectured that the story here is primarily of interest to those culturally connected to the site, but the reality, of course, is that the internment/incarceration of American citizens remains an action in American history that must not be repeated, and consistently invoked as such. In fact, the human story here continues to proliferate with the highly read and viewed Farewell to Manzanar and many other books and media presentations, including the musical, Allegiance on its journey to Broadway and beyond. Here, diagonally across the continent, there are at least six books in our local library with connection to Minidoka, including teen novels and easy reader books popular on the Children's section, bringing the specific stories of Minidoka and lives of its people to succeeding generations as part of the stories with which they grow. As a remote site with a little-known story, it takes its place in the larger American culture, with the historic site eventually joining others as a place of pilgrimage. How many of us have wanted to visit these sites familiar from our childhood stories and media. This is where it happened, the actual place. And this is where a character in stories that we have come to know and understand lived. When this place of historic and cultural significance, with deep emotional connection to survivors and descendants is faced with major impact, it creates a major disruptive cultural wound. It is an unfortunate reality that there is a history of major infrastructural projects being located adjacent, near, or through areas of especial cultural significance with power plants, highways, etc. The list goes on. The news now often highlights these occurrences. The prevalence of these situations spurred the need for Environmental Justice considerations in NEPA reviews (most often focused on health and safety), but sometimes on equally impactful cultural impacts, sometimes invisible and severe (but significantly noted in this review). The emergence of the issue here further intensifies the situation with its Environmental Justice aspect. A place with a powerful story would be replaced by another contemporary story and major issues with its location and existence in a remote windblown area. When that story transfer occurs, the historic cultural story easily recedes, as thoughts gravitate not to the historic wilderness beyond the historic site but instead to the largest wind turbine project of its kind in the country (!!!). The displacement becomes most uneasy, and the operational activity associated with it further intensifies awareness of the intrusion. The fact that the structures on the horizon are turbines in mobilization further disrupts with a visual energy that alters a landscape viewshed.
11782-2	Ken Fitch	The project would constitute a major conflicting presence for the NHS in its impact on the purpose of the Park, and especially in its alteration of the environment itself that is a primary experiential, value of the National Historic Site, and thus present an impairment.
11782-8	Ken Fitch	Indeed, the site speaks to us as an International Site of Conscience, even though perhaps we do not need that designation to tell us that, although we invoke it in this official assessment and determination. One visits a place to experience the place, and it is the experience of this place that is at risk. The experience of place is so essential that any diminishment becomes heightening in its negative impact.

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		In our history, we should continue to seek a path of healing. Unhealing should not occur.
11782-9	Ken Fitch	One of the central aspects of the experience of Minidoka often cited by residents is the character of the place to which they had been sent in the middle of nowhere, all we could see was a sea of sagebrush, and a place God forgot. and certainly, the area beyond the barracks areas powerfully intensified their sense of isolation, both in the emptiness and relentless exposure to natural elements of cold, heat, wind, snow, mud, all of it in extremes. This landscape and environment are central to the historic experience here and would now be altered by a distinctive multi –mobile presence with its ultra modern architecturally monumental spinning turbines and busy land traffic, with an endless venture into impersonality, diminishing the natural and stressed human experience that distinguished the site that now would be diminished forever, thus altering and eliminating the experience of this place for all who would venture here to honor and commemorate a human experience of continuing relevance for moral and cultural understanding and reconciliation, a reconciliation that has illumined our lives in ways that have spurred a more positive commitment to the diversity of the human community.
11797-2	John Shigaki	Minidoka invites connections to engage in this critical journey of learning and reflecting through personal stories, connections, and critical education in and around this sacred site. I can't believe there could be 400 wind turbines that would nearly cover half the size of the City of Seattle. It's beyond insulting. It will desecrate it and be an impairment of resources. The view sheds will be completely ruined when you're there adding to the hurt, insult, and injustice of my entire family and 120,000 other Japanese Americans. I support renewable energy but pitting this wind farm against this National Historic Site, this site of conscience, is outrageous. It is time to shut down the Lava Ridge Wind Project near Minidoka.
11800-1	Bridget Keaveney, Kim Hirose, Janet Nuzum, Janice Faden, Ryosuke Shibuya, Noriko Sanefuji, John Tobe, Julie Abo, Linda Adams, Michael Tanaka	We appreciate this opportunity to provide public comment on the DEIS for the proposed Lava Ridge Wind Energy Project in Southern Idaho. We are the Washington DC Chapter of the Japanese American Citizens League. Our members live in the Washington DC, Northern Virginia and Maryland Metro area. Some of our members are survivors and descendants of survivors of the Minidoka confinement site. Our main concern is that the proposed project would negatively impact the viewshed of the Minidoka National Historic Site which would degrade the immersive feeling, educational experience and healing at the visitor's center and the grounds. The recent Traditional Cultural Properties designation includes and protects this viewshed. Therefore we support Alternative A: No Action. The Lava Ridge Wind Energy Project proposal disregards the Congressional requirement that the Secretary stated to "protect [and] preserve . . . the resources associated with the former Minidoka Relocation Center." See: P.L. 110-229, Sec. 313(c)(2)(A), 122 STAT. 771 (May 2, 2008) (codified at 54 U.S.C. §§ 320101. Congress directed the Secretary to protect and preserve the entire historic 33,000-acre "Minidoka War Relocation Center," which extends beyond the legislative boundary of the Minidoka NHS. In addition, the Biden Administration's Proclamation on the Day of Remembrance of Japanese American Incarceration During World War II. February 18, 2022 states: "Today, the National Park Service helps preserve several Japanese American incarceration camps. These tangible reminders of our history provide important spaces for reflection and learning about the injustices born of prejudice. Preserving incarceration sites as national parks and historic landmarks is proof of our Nation's commitment to facing the wrongs of our past, to healing the pain still felt by survivors and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations and to combating xenophobia, hate, and intolerance — including through the reestablished White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders. One of our most pressing needs today, sustainable energy, should not have to come at the cost of the Native Americans, low income communities, and the Japanese American community. Let's learn from our past mistakes. Let's work together for sustainable energy sites of least conflict that make sense. We have the capability and the resources to find these sites around the country. Please choose Alternative A: No Action.
11806-1	Leslie Morishita	The proposed wind turbines will destroy the Minidoka NHS viewshed that is integral and essential for the immersive experience of the place. If allowed to happen, beyond the physical desecration, the turbines will stand as a gigantic, symbolic fuck you, to my family and community. The blatant disregard for the sacred meaning and importance of the place will make a mockery of the educational intent and cultural value and messages of the site. Please do not pile this injustice on top of the injustice of the existence of an American concentration camp in the first place.
11811-1	Joy Shigaki	It's unconscionable that 400 wind turbines might be erected near Minidoka. Given the height and scale of the wind farm, it will desecrate the site and be an impairment of resources. The viewshed will be ruined after finally making this place a site of conscience and part of the National Park Service. As an environmentalist, I support renewable energy. Yet, allowing this wind farm near this National Historic Site is perpetuating the harm, violence, and erasure of my family's history and of so many others in this country where our past has been continually ignored, covered up or erased. I implore you to stop the Lava Ridge Wind Project NOW.
11815-2	Liz Phillips	I am not against wind turbine energy. I am not against the Lava Ridge Project. I am against anything that would decrease the purpose of the Minidoka Historical Site. Historical sites are memorials to help us reflect, remember and learn. The isolation of the Minidoka camp is a huge part of the ability of individuals to reflect on the injustice that happened there. I believe a reasonable alternative is to move the Lava Ridge Project at least 30-35 miles away from the Minidoka Historical Site.
11817-2	Satsuki Ina	I support sustainable energy and applaud President Biden's commitment to supporting and encouraging sustainable energy projects, however, these projects should not come at the cost of communities of color, in particular, Indigenous Americans who have suffered centuries of dislocation and cultural erasure as recognized in this DEIS as a "environmental justice community." Secretary Haaland stated in her "Federal Indian Boarding School Initiative" that "only by acknowledging the past can we work toward a future that we're all proud to embrace." I ask the Secretary to not repeat the mistakes of the Department of the Interior during WWKK and protect the preservation of the MInidoka Historic Site and its viewshed now and for future generations.
11819-1	Stephen Okawa	History is important in each of our lives. It plays an essential part in the shaping of it. The sense of place in that history is of equal importance. Since I was born in Minidoka in mid-1943, I have no recollection of the place. I and my family have only a sense of Minidoka as it is now. But at least we could imagine that this bleak and desolate land was once home to my family and almost 10,000 other unconstitutionally incarcerated Japanese Americans. The desecration of this National Historic Site and surrounding area would be a further disgrace to not only those who suffered at Minidoka, but it would surly be another unconscionable act. We urge you to do the right thing and not allow the tragedy of allowing windmills to be built in or anywhere near this sacred site . . . a place of so much meaning and history not only for my family, but to so many others now and in the future.
11823-1	Amy-Aiko Hovland	The site has a nice visitor center, which helps those wanting to know more and experience more about the camp itself. The site has visitors who come to experience the history here, and we must keep it preserved. The BLM has considered this site as a viable place for renewable energy options, but it comes at the expense of American minority people connecting with our history. We must not build wind power in such away that does not inhibit this historic site. We must be allowed to grieve without turbines interrupting the process. If this project goes forth as proposed, we will lose an incredibly powerful experiential opportunity of what the Japanese Americans endured. It will be obscured by this proposal's radical changing of the visual and emotional landscape. We must preserve both the positive and negative parts of our history, and we must not remove or significantly diminish the impact of historical sites where cultural minority tragedies are memorialized. We must retain this landscape so that my child and the generations to come can continue to understand and experience our history with the stark visual impression and the emotional impact that we have preserved.
11828-1	Susan Kunimatsu	The Lava Ridge Plan of Development issued by Magic Valley Energy, LLC in June 2021 contains only a vague explanation of how the project site was selected: The proposed Project location was selected based on the quality of the wind resource in the area, the power markets accessible by existing and planned transmission lines, the availability of suitable land, and the absence of land use constraints, critical environmental concern[s],…and other restrictive land use designations (page 3). Impact on historic resources is not listed as a siting consideration. Later, the same report says that MVE, its contractors and all project personnel must comply with federal and state laws and regulations including…Section 106 of the National Historic

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		Preservation Act (page 57). In the Draft EIS issued in January 2023, the Stakeholder Assessment and Engagement Report contains a long list of recommendations for community input on the impact of the project on the Minidoka National Historic Site. All of this input was gathered AFTER THE PROJECT SITE WAS SELECTED. Visual simulations prepared as part of the DEIS show that the project will dominate the skyline visible from the Minidoka NHS. It seems none of this was taken into consideration as no alternative sites were considered in the DEIS. I am a Sansei (third generation) Japanese American living in Seattle WA. My mother, grandmother, and several of my aunts and uncles were imprisoned at the Minidoka concentration camp during World War II. That history is a powerful and emotional chapter in the history of the Japanese American community in Seattle and the nation. The BLM and MVE failed to comply with federal regulations in siting the Lava Ridge Wind Project without considering its impact on the Minidoka NHS. Other locations should be considered in the final EIS, or the project should be scrapped.
11834-2	Lynn Fuchigami	Established as a National Monument by President Clinton in 2001 and re-designated as a National Historic Site under President George W. Bush in 2008, the Minidoka National Historic Site exists as a reminder of the fragility of our freedom and how we must be vigilant to protect civil liberties, civil rights, due process and the principles on which our country was founded. It is a testament to the enduring spirit and resilience of the people that were incarcerated there. Furthermore, the Japanese American Museum of Oregon interprets the Japanese American WWII incarceration story through the Minidoka site and experience. This site and the principles that are embodied there must be protected and preserved. Fundamental Resources and Values are clearly identified in the Foundation Document of the Minidoka National Historic Site. Environmental Setting, Commemoration and Healing, Public Understanding, Education, and Involvement are paramount. The NPS/DOI document states, “Fundamental resources and values help focus planning and management efforts on what is truly significant about the park. One of the most important responsibilities of NPS managers is to ensure the conservation and public enjoyment of those qualities that are essential (fundamental) to achieving the purpose of the park and maintaining its significance. If fundamental resources and values are allowed to deteriorate, the park purpose and/or significance could be jeopardized.” This proposed wind project jeopardizes and/or will destroy the very fundamental resources identified in the Foundation Document of the Minidoka National Historic Site. Any decision other than Alternative A appears to contradict the Department of the Interior and National Park Service’s purpose and goals for the site. In closing, the DEIS recognizes and identifies many of the potential adverse impacts and effects that the Lava Ridge Wind Project will have on this culturally and historically significant site. It also acknowledges the concerns expressed by the Japanese American community, so anything other than No Action silences the voices and concerns of important stakeholders, and shows that once again, government is willing to turn its back on the Japanese American community.
11842-3	Erin Nishijima	I request that you think deeply about the consequences of your actions with Lava Ridge Wind Farm. Listen to their stories of the communities you are interrupting and educate yourselves on the history and significance of Minidoka National Historic Site.
11843-1	Harriet Fukushima, Tamiko Nimura, Stan Shikuma, Hiroshi Shimizu, Satsuki Ina, Barbara Takei, Ken Nomiyama	Like the Minidoka Historic Site, the Tule Lake National Monument is managed by the NPS. Both sites are recognized as National Historic Landmarks, the highest designation granted to America’s places of historic significance. Both sites were also recognized as Traditional Cultural Properties, places that have deep meaning and significance to the Japanese American community — places that our government has a responsibility to protect, not desecrate. In February 2022, President Joseph Biden promised to help heal the pain of Japanese American survivors of incarceration and descendants, and pledged to preserve and protect these carceral sites. He stated: Preserving incarceration sites as national parks and historic landmarks is proof of our Nation’s commitment to facing the wrongs of our past, to healing the pain still felt by survivors and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations. President Biden’s Day of Remembrance Proclamation, February 18, 2022 The Lava Ridge wind farm project does the opposite of preserving and protecting Minidoka, threatening the work of NPS and multiple Administrations that have worked to preserve this American civil rights site. Tule Lake Committee DEIS Lava Ridge Wind Farm Page 2 The only Option that is truly consistent with President Biden’s Proclamation, that ensures the preservation of the Minidoka site is Option A, the “no action” option. Option A is the only choice that does not create a negative impact on Minidoka’s view shed, a choice that prioritizes protection of the archeological, historic, cultural and environmental resources of the Minidoka National Historic Site. Options B, C, and D examine a range of minimal and maximum impacts created by the wind turbines. However, the various configurations, whether low, moderate or severe impacts, all share the unacceptable feature of creating a visual blight. Introduction of a massive wind farm infrastructure within the view shed of the Minidoka concentration camp will destroy the setting, feeling and association so important to the integrity of this American concentration camp. The sense of isolation and abandonment — so much a part of the incarceration experience — will be erased by the line of wind turbines encroaching the horizon. The Bureau of Land Management is in a position to protect a significant national civil rights site. Option A is the only option that honors the social justice story the Minidoka National Historic Site was created to tell.
11853-1	Ryan Kozu	I strongly object to the Lava Ridge Wind Project and demand that Alternative A: No Action! be chosen. As a descendent of Minidoka survivors, this land holds great cultural and historical significance to my family and community and the DEIS fails to adequately protect this. The Minidoka National Historic Site is also sacred ground to my family as my great grandfather also died at Minidoka. As an organizing member of the Minidoka Pilgrimage Planning Committee, we bring survivors, their descendants and other allies back to Minidoka National Historic Site each year for reflection, education, healing and closure. We do not come to Minidoka NHS as tourists or recreationalists as the DEIS states. We come back as part of the healing process of our intergenerational trauma. Minidoka National Historic Site holds as much cultural and historical significance as the Gettysburg National Military Park, the Pearl Harbor National Memorial or Saratoga National Park and preservation of the immersive feeling of isolation and soberness is just as critical at Minidoka as the other sites. Please do not allow the Lava Ridge Wind Project to continue to proceed at or near our sacred Minidoka National Historic Site. Alternative A: No Action is the only option in order to preserve this sacred ground.
11860-10	Shauna Robinson	The visual protections for the Minidoka National Historic Site are very inadequate and play a role in the National Trust for Historic Preservations listing of the Minidoka NHS as one of the eleven most endangered historic places in America . For the 13,000 Japanese Americans who were unjustly held in this remote camp during World War II, the views were constant reminders of their isolation and unwarranted imprisonment. The survivors of Minidoka and their descendants today consider this location sacred, with many making annual pilgrimages to Minidoka to honor the sacrifices and resolve of their family members. The expansive views are an integral part of the camp’s history, contributing to its unique setting, feeling, and sacred attributes. For placement of wind turbines just two miles away and continuing to the north/ northeast, it would absolutely impose adverse effects on Minidoka. Disruption of the meaningful views is an inexcusable intrusion on the setting and feeling of the incarceration camp.
11862-2	Suzanne K. Ishii-Regan	The Minidoka Internment Camp site is sacred to those whose lives and families were impacted by the WWII incarceration/internment. The shame and fear that the incarcerated/interned Japanese and Japanese Americans felt as a result of the 1^71^711 Internment is well-documented. And because of the shame and fear, most did not discuss the experience with their children, grandchildren and great-grandchildren. So, for many, it is only through personal research. proiects such as ours. and pilgrimages to the internment camp sites, that they are able to learn about what occurred during the WWII Japanese Internment and the impact on their ancestors and their families. The museum at Minidoka is a living museum. Its location, geography, topography, and climate are as much a part of the experience as the information contained in and/or represented by the structures on it. Having a windmill farm visible from the Minidoka Internment Camp site will negatively impact the experience for all visitors to the site/museum, distracting from the bleak landscape which the internees faced. There is an old saying that "seeing is believing." Dotting the landscape with manmade modem technology will serve as a distraction and alteration of the backdrop, thereby changing the experience of visiting Minidoka. I am therefore, submitting this letter in support of No Action Alternative A. We are aware that Karen Atkinson, who had family members incarcerated at Minidoka, has personally submitted a letter in response to the proposed Wind Farm. And I am incorporating her comments by reference herein.
11874-1	Brittany Arita	Minidoka is a National Historic Site, and for good reason. It is a significant, even sacred, site for the Japanese American Community.

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		In 1942, this site held almost 13,000 people of Japanese ancestry. Among them was my grandfather. He was first incarcerated at Manzanar War Relocation Center (another National Historic Site, which also had to fight against the building of a large-scale solar farm) before being transferred and incarcerated at Minidoka. This site is historical. This site is critical to the preservation and education of the Japanese American experience during WWII. This site is meaningful. This site is also a place of healing. Every year, many gather for the Minidoka Pilgrimage, to honor and heal and learn from ancestor's experiences. I hope to join them soon. And I hope that the site will continue to be honored and preserved, as it is, for generations to come. Reckoning with history is imperative to healing. The proposed Wind Project would disrupt this historical site. This project also continues a pattern evidenced throughout the history of this country of the seizing, displacement, and desecration of marginalized communities' lands and sacred sites. While the importance of clean energy and a sustainable future are imperative, so is the preservation of such historical sites like Minidoka. Such clean energy efforts should no longer be at the expense of marginalized communities, their lands, and their histories. These massive, 740 ft tall wind turbines would surround the landscape of Minidoka, in a way which is both disruptive and disrespectful. The landscape is it's own character in the story of the forced relocation and incarceration of the Japanese American community. And one that needs to be protected & preserved. I urge the Bureau of Land Management to thoughtfully reconsider this project and opt for Alternative A: No Action. Please help the Japanese American community continue to protect and honor this historical site for generations to come.
11928-1	David Sakura	One of the first things a visitor sees when entering the Minidoka National Historic Site is the Honor Roll that displays the names of hundreds of the men and women from Minidoka who fought in WW II. My father, Chester Y. Sakura was among the first from Minidoka to volunteer for military service. He later discovered that his three brothers had also enlisted, including his youngest brother who was a father of a six-month old son. My father (as a 2nd generation Japanese American, or Nisei) felt that as an Army enlistee, the US government had finally recognized him as a full-fledged US citizen rather than as a potential threat to the country. In May 1943, my father left Minidoka for training with the 442nd Regimental Combat Team (RCT) See photo below . I was 7year old at the time. Before he left, my father gave me the following instructions: "You are now the man of the house and take care of your mother and three brothers". Desperate upon his leaving, my mother begged my father not to leave her with the three boys. She said: "Chester, you're 38 years old with three boys. You don't have to go!" In retrospect 30 years later, my father recognized that "the intervening time after leaving for service until the end of the war was a hard struggle for Aggie (my mother)". The unsung heroes (wives, elderly parents, children) of the Minidoka story are those who struggled against loneliness, uncertainty, isolation, heat, and dust, while their loved ones were away fighting and dying in the war. As one who is 87 years old and a survivor of Minidoka, I consider this ground (the Minidoka National Historic Site, and my childhood home for 2 years) to be sacred and that the memories of these unsung heroes should be preserved as such. The proposed Lava Ridge Wind Project would forever change the character of the Minidoka National Historic Site. If a permit were granted by the BLM and if I were to visit Minidoka, perhaps for the last time, I would be saddened to see a vast array of giant wind towers, some standing within a short distance from my former barracks (Block 15-Building 8-Room E). It would no longer be a place of remembrance and meditation for me and for generations to come. In a letter signed by President G.H. W. Bush that was sent to me and each of the surviving internees, along with a redress payment of $20,000, he stated: "We can never fully right the wrongs of the past. But we can take a clear stand for justice, and recognize that serious injustices were done to Japanese Americans during World War II." Will the U.S. government, and the BLM go back on its promise, by once again committing yet another in its long line of injustices towards Asian Americans by approving the Lava Ridge Wind Project? I urge the BLM to seriously consider the promise made by President Bush to the survivors of Minidoka and take a strong stand for justice by denying the siting of wind turbines within sight of the Minidoka National Historic Site. I strongly support Option A in the DEIS, along with encouraging the BLM to take future action in order to protect permanently the lands surrounding the Minidoka National Historic Site.
11932-1	Sharon Sakamoto	My name is Sharon Sakamoto. I was born in Camp Minidoka. I am an American citizen. My parents, Roy and Josephine Sakamoto, both natural born American citizens, were imprisoned in Camp Minidoka. In 1942, they along with my older siblings, Eileen (6 yrs), Kent (5 yrs), Dennis (3 yrs.) and Joy (2 yrs.), lived in the desolate area called Camp Minidoka far from their robust and thriving community in Seattle. My family's entire Camp Minidoka incarceration experience left indelible scars and dark memories in my famly's collective psyche. My parents could hardly speak about it. The Lava Ridge Wind Project would so greatly alter and destroy the landscape at the Camp Minidoka site as to obliterate the experience and erase an important memory of our collective American mind. The sense of desolation, destitution, devastation and annihilation experienced by the Japanese American community upon arrival at the Minidoka Camp will be lost forever with the Lava Ridge Wind Project. The Project would concretely demoralize and totally disregard our community once again. All Americans become better citizens when we remember our country's past. I urge the Bureau of Land Management and you, Kasey Prestwich, to be leaders today and not repeat the failure of leadership of 1942. I urge you to lead our country forward by not sucumbing to the economic benefits of a few, by not destroying the evidence at Camp Minidoka, by not again extinguishing the Minidoka Japanese American community and legacy and by not repeating history. All Americans must remember the Japanese American experience at Minidoka. The Bureau of Land Management has a moral and American obligation to remember fully and memorialize the Japanese American experience at Minidoka in respect of our citizens who lived it and so our country will not act in the same manner ever, ever again. I ask you and my congressional senators and representatives to stop the Lava Ridge Wind Project which desecrates the Camp Minidoka memory of all who lived, died and were born there.
11935-1	Alexandra Delis-Abrams	I would be opposed to this project, and, although we need wind power, and I support wind power, the turbines must be refined to not harm birds, and not be located near a revered, and respected and honored Memorial site.
11936-1	Wendy Tokuda	My parents met in the Minidoka Internment Center, and my brother was born there. Altogether, ten members of my family were incarcerated there, many of them for the entire duration of the war. My parents lost everything they had. The imprisonment would affect them and me and my siblings for the rest of our lives. So, Minidoka is sacred to me. Even though I was not born there, Minidoka is in my bones. The proposed wind towers are taller than the Seattle Space Needle. Seattle is my hometown, and I know how that single structure- the space needle- impacts the view and the feel of the city. I think dozens, hundreds of these huge wind turbines would dominate the entire experience of visiting Minidoka. The sheer size of the project would reduce Minidoka to a tiny postage stamp. It would diminish the impact of an historic site that changed the lives of my family forever. Minidoka was located far from the coast in a remote spot for a reason- so that the Japanese locked up there would not be able to spy. The feel of the location is important for that reason- a desolate spot, hot and dry. It's part of the history. When I go there, I can feel my parents. The Lava Ridge Project would destroy that feeling. The wind towers would dominate the experience. It is hurtful to me. Frankly, it feels like an insult. That's why I'm against it in total. No wind towers. I am an environmentalist. I have solar panel, a plug in hybrid car, and an organic garden. I compost and save water. I volunteer doing environmental restoration work regularly, almost daily- I'm not kidding. I am all for wind power, just in a different location. Because to put it adjacent to, or close enough to impact the backdrop of the Minidoka National Monument will diminish the importance of the history of that location. It was in a desolate spot in the desert for a reason. Because we weren't considered to be real Americans. Please help us preserve the importance of this fact so that our history is preserved.
11942-1	Richard Ito	Damage to the Nature and Character of a National Historic Site: It should be abundantly apparent to any informed unbiased reader of the draft EIS that the proposed project impacts the historic Minidoka Confinement Site. Yes, evaluating and quantifying such impact is a poorly developed field. Yet not adequately addressing the impact, especially when the impact is showing itself to be adverse, brings negligence to the process. The overriding issue of social impact is of much the same character as if the Lava Ridge Project was proposed to be located at a similar distance to Arlington National Cemetery.
11942-3	Richard Ito	Lastly, it seems proper that the producers of the EIS make a review of the project pushing bias that seems to arise in many other EIS reports, intended or unintended. For example, the attempt to create a future scenario from Minidoka looking towards the windmills is deceiving without accounting for the fact that the human eye is highly perceptive to motion, in this case the many constantly spinning blades. Perhaps, uncomfortably revealing of bias, hopefully not intentional, is the description of people arrving as "tourists and recreationalists". This EIS is not about affect on an amusement park.
11949-3	Victor Yamada	I'm a Japanese American who had a grandmother and uncles removed from Seattle, Washington under Executive Order 9066 and sent to the Minidoka War Relocation Center in Idaho. One of my uncles joined the US Army's 442nd Infantry Regiment from the Minidoka Camp. He fought in the European Campaign, was injured, and received a Purple Heart for his service during World War II.

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		My extended family member wrote No-No Boy, a fictionized account of Japanese American incarceration during World War II. Part of the setting in the novel includes the Minidoka War Relocation Center. My family and I have visited the larger Minidoka War Relocation Center Site and Minidoka National Historic Site from the time the location was nearly bare to its being designated a historic site by the National Park Service. We remembered and honored family members and other thousands of Japanese Americans who were wrongly and unjustly incarcerated at this site. We were gratified that the general public is being properly educated on the Japanese American experience during World War II. On behalf of my family, I am submitting comments on the Lava Ridge Wind Project Draft Environmental Impact Statement. I am for renewable energy development done in a responsible manner. However, the proposed project and its discussed alternatives would cause significant impacts to the Minidoka National Historical Site. I am addressing significant impacts under 3 topics – Visual Resources, Cultural Resources, and Environmental Justice. Project Components – The wind structures (including the towers and extended vanes) would be up to 700 feet high. For comparison, these heights are similar to the Seattle Space Needle or a 70-story building. Visual Resources – The wind towers would be clearly visible at locations on the Minidoka National Historic Site. An unobstructed view of the sweeping vistas and desolate environment is essential to the immersive experience and practice of commemorating those who were incarcerated at the Site. [...] Environmental Justice – The proposed project and associated visual changes would have significant and adverse effects on the setting, feeling and experience at Minidoka National Historic Site. The Site is an acknowledgement of the injustice that happened to thousands of Japanese Americans. It notes the distinct population who suffered unique experiences before, during, and after incarceration associated with World War II. [...]
11959-1	Karen Yoneda	I am deeply concerned about the placement of numerous turbines close to Minidoka National Historic Park. Historically the wildlife and the Native Americans have resided. The Japanese American citizens were forcibly interned in World War II due to discrimination. This is a sacred place. We need to honor Minidoka to our past, present and future!! Other events/developments seem to target the Asian community. Seattle Sound Transit have considered dividing up Chinatown for the new development recently.. Chinese were evicted from Tacoma in 1885. In all respect, please consider Minidoka sacred. Please do not place the turbines in Minidoka. Why was Minidoka considered? Why was other national parks or other areas not considered? Find another solution!!
11963-1	Jeff Fujioka	I am definitely against Alternative B which puts the wind turbines in clear and obtrusive view of the Minidoka site.
11965-2	Matt Bridges	Also, section 3.5.3 states Today, Minidoka National Historic Site conveys feelings of isolation and abandonment, expressing a sense of the desolation experienced by Japanese Americans during the incarceration period. The feeling of the site evokes the victimization, injustice, and racism that are important aspects of the site's history. [If] the wind project is built, visitors to the historic site may no longer experience the feelings of wide-open spaces devoid of large-scale development characteristic of the incarceration period and agricultural and reclamation projects of the twentieth century. In this way, the presence of turbines, transmission towers, collection lines, battery storage facilities, maintenance facilities, and substations could impact the feeling of the site. Japanese American concerns: Disproportionally impacting historic sites associated with their community Siting the project in proximity to the nationally significant Minidoka NHS given Japanese American community concerns and sensitivities associated with impacts related to development in the surrounding area Honoring the place of Japanese Americans in national history Maintaining the wide-open vistas of the landscape as would have been experienced at the time of Minidoka WRC incarceration Prominent project structures and their lighting visually impacting Minidoka NHS All these concerns will be real if this project goes through in any capacity other than Alternative A, the No Build option. I view the Minidoka National Historic Site as a remembrance of an incarceration facility. This is a true reminder to the atrocities bestowed on the Japanese Americans under the direction of the U.S. Government. To build a wind project near this facility and over the sacred grounds of Native American Tribes, thus degrading, obscuring, and obliterating cultural resources, appears to be a cover up of the atrocities of the Government meted out on her people. Burying the past and building a project will restrict the citizenry from learning about these atrocities, and enjoying the learning experience of visiting our public lands. The BLM must meet their mission statement to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. For this reason, please select Alternative A, the No Build Option.
11968-3	Cheryl Sandy	We have the Minedoka Set aside grounds honoring the Internment Camps endured by our Japanese Imigrants. This meaningful land would be disturbed.
11970-3	Janet Keegan	When the Monument Resource Management Plan (RMP) was written in 1985, the remnants of the entrance to the Minidoka War Relocation were clearly visible. In 1979, a six acre parcel of the former site was listed on the National Registry of Historic Places. In 2022, the Friends of Minidoka submitted a Traditional Cultural Property study to the Idaho State Historic Office (SHPO) to determine eligibility of the historic footprint and view shed of MNHS for the national registry. The SHPO determined it is eligible in November 2022. Minidoka | Densho Encyclopedia Mitigation: Volume 3, App4-34 XIV and XV: Existing transmission lines are a visual pollution on the current landscape. Adding more to the pollution of the view shed is not acceptable. Mitigation would not ease the emotional impact and pain that was created by forced, unconstitutional removal from homes, farms, businesses, friends and neighborhoods in 1942 by the United States government. Descendants and survivors experience need healing and they need to know that MNHS remains a sacred place of healing, remembrance and the historical value of such a site is not destroyed. Attending a pilgrimage at MNHS and seeing hundreds of wind turbines and miles of transmission lines in the near and far distance would decimate the visual impact and immersive experience of descendants and survivors of the concentration camp. The prisoners of the WRC were not only imprisoned by barb wire and armed guards, they were held in place by the vast, wild and uninhabitable landscape that surrounded them.
11977-1	Mike Ishii	In my lifetime I have become a master healer using my training in East Asian medicine to help those suffering with trauma. With time I have come to understand how hurtful and damaging the experience of being imprisoned at Minidoka was for my entire family and the JA community. Our people have endured inordinate rates of chronic disease related to stress. We have experienced high rates of addiction and mental health issues. We have exhibited many of the classic forms of post-traumatic stress syndrome and adaptive survival behavior that is common for people subjected to severe violence and trauma. This is true across generations of Japanese American camp survivors and their descendants. One specific harm my people are still healing from is emotional trauma due to forced removal, and loss of home and place. Displaced, incarcerated children suffer impacts to their developing brains and psyches that last a lifetime presenting as depression, anxiety, panic disorders, pain syndromes and compulsive disorders. This is what I witnessed in my mother and her siblings. It is what I know was passed down to my generation as well. As a human rights worker and healer, I have come to understand that collective and individualized trauma often become deeply connected to place. Minidoka is central to my community as place. In recognizing this I implore you to understand that Minidoka should be prioritized as a site of national conscience and healing that supersedes other considerations. For this site, like others of its kind

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		around the world, are necessary as haunting reminders so that we do not repeat our violent history. Such places should be set aside as special sites to honor human life, human resilience and to foster efforts to heal violence and trauma in humans and to heal desecration to the land. As a site of conscience there is necessary healing of place that needs to be supported at Minidoka. The proposed wind farm exhibits a tremendous lack of regard or sensitivity and is dismissive of the experience of every person who lived and died in captivity there. It also demonstrates a callous lack of respect for this land that was truly desecrated. The proposed project will not only change the viewshed but negatively impact the site as a place of worldwide cultural significance, its importance as a place of healing and reflection and undermine attempts to heal the suffering of this place and of the people imprisoned there. Even a moderate change to the viewshed would still impact the integrity of the Minidoka site. I can't imagine the outcry that would resound were a wind farm to be proposed surrounding Dachau, or the ruins of Hiroshima or at Wounded Knee. Why then would so little regard be offered for this site or the impacted people who are connected to it? To categorize Japanese Americans connected to Minidoka as "tourists and recreationalists" is not only deeply hurtful but further exhibits blindness to a cultural understanding of repair and healing of the U.S. incarceration of Japanese Americans. The level of arrogance required to proceed forward with this proposal when impacted people who paid dearly with their bodies and spirits have spoken out and requested preservation over development, is absolutely sickening. It is often the way of U.S. society to whitewash over the racist violence of its past in order to erase history and to recycle places where great harm to communities of color and immigrants occurred. This continues a pattern of white supremacy. We have seen this in the intersectional history of forced removals, forced displacements, mass incarcerations, and separation of families - all carried out by U.S. governmental agencies. We see it in the paved over graves of enslaved Africans at Wall Street; the desecrated graves and bones of Native Hawaiians on Maui paved over in outdoor shopping malls; in the use of Fort Bliss, a former Japanese American incarceration site now re-purposed to mass incarcerate unaccompanied migrant children; or at the Tanforan racetrack shopping mall parking lot, once a Japanese American incarceration site. And now we see the erasure of the sanctity of Minidoka and its surroundings in the proposed Lava Ridge Wind Project. Further compounding this violent legacy is the Department of Interior management's historical relationship to Indigenous and Japanese American communities. The use of reservation lands to imprison Japanese Americans and the very desecration of stolen Indigenous lands used for any of the wartime incarceration sites, all encompass an agenda of white racism and genocide. That legacy is not disconnected from this particular proposal. This proposal stings for its lack of regard for our outcries, for the erasure of our humanity, our experience and of the sacred and historical importance of this place. In the stewardship of these places, we reveal our true inner nature and, ultimately, how we as a country treat human beings and the sacred lands where they reside. The land where you would like to build the Lava Ridge Wind Project has deep consequential impact on my people's future. The impairment of resources will affect permanently our ability to heal the trauma experienced by the more than 13,000 people who suffered in that place. I implore you to reject the Lava Ridge Wind Project. In the spirit of healing,
11977-2	Mike Ishii	I would like to comment on the detrimental impact of the proposed Lava Ridge Wind Project upon the continued repair and healing for the Japanese American community in relation to the site of the former Minidoka War Relocation Center. This proposal has created great anguish in my community. I am deeply troubled that we have arrived at a moment when survivors of the Minidoka concentration camp, people deeply impacted by the violence experienced at the site, are forced to campaign to stop this construction of the Lava Ridge Wind Project. The proposal affirms a historical pattern that has also played out regarding other Japanese American confinement sites like Fort Bliss, Fort Sill, or Pomona- a historic pattern of utter disregard and dehumanization of communities of color most impacted on these sites who decry further violations and have been ignored.
11983-1	John Ruff	I can't imagine the BLM approving a wind farm that would intrude upon the viewshed of Arlington National Cemetery, or one near Gettysburg, or Monticello or Mount Vernon; I can't imagine our federal government not fighting such a project at Normandy where it could be seen from the cemetery were American soldiers lie buried. BLM documents describe people who would go to Minidoka as "tourists and recreationalists." I have gone on two pilgrimages to Minidoka, and I head for my third this summer. All were carefully organized by volunteers in Seattle and Portland who have family who were born there, lived there, even died there. To go on a pilgrimage implies you are going to a holy place, to be blessed, to be healed, to honor those who came before you, who survived (or did not survive) a horrible ordeal there. Minidoka was situated in a remote desert area, a reclamation area which Japanese and Japanese American farmers did reclaim; they did make the desert bloom, even as they helped to save the Idaho beet crop. But Minidoka like the other camps was situated so this crime against humanity would be largely out of site and out of mind for the rest of America. After the war, the barracks were sold and carted off, the much improved land put in a lottery or auctioned off. It became a desert again with only the so-called "Reception Center" made of basalt and the concrete foundations under the water towers remained as permanent scars from the ordeal...To put that wind farm there would be a desecration; we don't need to industrialize a holy site.
11983-2	John Ruff	A vast wind farm would have plenty of wind, I get that. But it also domesticates what was a barren, hostile area, and people who go there to educated, to get some sense and feeliing for what the place was like, can't have the viewshed tamed or domesticated. Idaho is huge place and largely unpopulated There has to be another area that is has not the associations for the Japanese American that this one has.
11984-1	Nomu Desu	As a writer for the Discover Nikkei website [...] So much Japanese Canadian history has been lost here too. It really concerns me that human rights crimes like the internment of Japanese Americans and Japanese Canadians is being 'erased' by our respective societies. Having important sites like Minidoka preserved for future generations is critically important if we are not going to repeat the mistakes of the past.
11985-2	Val Tollefson; Bainbridge Island Japanese American Exclusion Memorial Association	The Bainbridge Island Japanese American Exclusion Memorial honors the memory of the 277 Bainbridge Islanders of Japanese descent who were forced from their homes in 1942 as a result of Executive Order 9066. Most of those people spent the duration of World War II incarcerated at Minidoka. The majority of them returned to the Island after the war, resuming their lives as valued members of a tight-knit community. Our Memorial is an administrative unit of the Minidoka National Historic Site. We have a stake in any decision the Bureau of Land Management makes on the Lava Ridge Wind Project Environmental Impact Statement. We ask that this project not be approved. Accordingly, we ask that you adopt Alternative A of the Draft EIS. Alternative A is the "no action" alternative. "No action" would preserve Minidoka as the sacred site for Japanese Americans that it is today. The adoption of any alternative other than "no action" would ignore the essence that makes Minidoka such an important monument. To understand that fact, one needs to know why Minidoka came into being, and what role it plays today. In 1942, a colossal wrong was perpetrated under the cover of government authority. The rights of citizens of Japanese ancestry were ignored and they were imprisoned. Wartime hysteria and racism combined to support this injustice. In later years, the government came to acknowledge this wrong, and to apologize. The creation of the Minidoka National Historic Site was part of this restorative process. With the Lava Ridge project on its docket, the BLM appears ready to administratively nullify that apology.
11991-1	Julie Abo	I am providing comment on the draft Environmental Impact Statement because of my close connection to Minidoka National Historic Site. The proposed project is in the viewshed of this sacred educational site. The day after Pearl Harbor was bombed in 1941, the FBI came to the Tanaka home in Juneau, Alaska and took away my mother's father, Shonosuke Tanaka. My mother, her mother and her siblings didn't see him again for a year and weren't reunited until two years later. In the spring of 1941, my mother, Mary (Tanaka) Abo and the rest of her family along with some 200 other Japanese American and Tlingits were forcibly removed from their homes in Juneau, Alaska and were incarcerated at Minidoka War Relocation Authority Camp in Southern Idaho from 1942 to 1945. (881 Unangax̂ peoples were incarcerated in Alaska.) This has indelibly impacted all of our lives. I'll never forget walking on the Minidoka site with my own daughters, feeling the hot sun beating down and looking off into the expansive distance, feeling as though my ancestors were with me. My aunt, who was nine when they were incarcerated there, was recalling some of her memories walking on that same spot many decades before. Listening and sharing in community with the other 300 participants was a very spiritual experience and a kind of acknowledgement that this did happen, it was wrong and that we can move on. Today, I also think about the Shoshone Bannock and other indigenous peoples who were here centuries before who were forcibly removed from this land, not a place they consider their property, but a place they still consider to be part of their creation story and identity. Just over 80 years ago, President Franklin D. Roosevelt signed E.O. 9066 that enabled the forced removal and incarceration of over 125,000 Japanese Americans in 75 detention centers and incarceration sites such as Minidoka and is recognized today by the US government as a decision based on war hysteria, racism and a failure of political leadership. There were some 13,000 Japanese American and Tlingit people who were incarcerated at Minidoka. The Japanese American incarceration was a violation of constitutional rights that resulted in the separation of families, the loss of generational wealth and the continuation of widespread multigenerational trauma that still exists today.

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		Today, for my family and me, and the Japanese Americans and indigenous Tlingit who were incarcerated there and their descendants, friends and allies, Minidoka is sacred and hallowed ground, a place for commemoration, reconciliation and healing. Today, Minidoka is a National Historic Site maintained by the National Park Service overseen by the Department of the Interior, the same governmental agency that administered the incarceration in 1942 through the War Relocation Authority. The preservation of the site is proof that the US government recognizes the wrongs of the past and its efforts to make it right and has lessons for all who pass through the site. Recently, my mother and I have attended presentations by Dr. Satsuki Ina, a 2020 American Psychological Association Presidential Citation recipient psychotherapist and University of Michigan psychologist Dr. Donna Nagata and we have learned about how the incarceration was a psychologically traumatic experience, particularly for the children such as my mother, Mary (Tanaka) Abo that caused shame and silence that was passed down to my generation. My mother and I have participated in multigenerational discussions at Pilgrimages for the Minidoka community and allies which have had a healing effect. (See Dr. Satsuki Ina's PBS documentary Children of the Camps.) Magic Valley Energy's Proposed Lava Ridge Wind Energy Project proposal would irreversibly degrade Minidoka National Historic Site's immersive experience for survivors, descendants and visitors. The construction of this site would effectively undo the years of reconciliation and education outlined in the bipartisan Civil Liberties Act of 1988 that clearly states that the incarceration was wrong and to preserve its lessons through preservation of the historical site, public educational programs and pilgrimages. This apology was recently repeated in President Biden's February 19, 2023 Statement from President Joseph R. Biden, Jr. on the Day of Remembrance of Japanese American Incarceration: The incarceration of Japanese Americans reminds us what happens when racism, fear, and xenophobia go unchecked. As we battle for the soul of our nation, we continue to combat the corrosive effects of hate on our democracy and the intergenerational trauma resulting from it. We reaffirm the Federal Government's formal apology to Japanese Americans for the suffering inflicted by these policies. And we commit to Nidoto Nai Yoni – to "Let It Not Happen Again." Furthermore, the Department of the Interior would be repeating the mistakes of 1942 and it would send a negative message to the local and national community.
12019-1	Suzu Kawamoto	I am adding my name and voice and heart to the call to stop any further action on the proposed Lava Ridge Wind Project. This project will completely bury any remaining evidence of the atrocities of the incarceration of the Japanese American citizens at Minidoka. In fact, I was disheartened, but not surprised, to not even see Minidoka mentioned in the proposal. Minidoka is a Landmark; an important part of American history that must remain and not erased. In the name of my Grandparents, aunts, and uncle, and all the Japanese American citizens who were unfairly incarcerated in Minidoka; losing their possessions, dignity, and years of their lives, I implore you to choose the "No Action" alternative.
12046-1	Mary Abo	I am an 81 year old Minidoka Survivor. My family was ordered from Juneau, Alaska, along with all the Japanese as well aany Native children born of Japanese fathers. They were scattered throughout Alaska. My mother who could hardly understand English and my siblings were sent to Minidoka while my father was sent to a different camp in Santa Fe, New Mexico. Consequently, she was thrown into a constant state of anxiety, even hoarding toast under her cot from the mess hall because she thought we might starve. I have often returned for Minidoka Pilgrimages with my family. Being there has made it easier for my daughter and my granddaughter to understand what it was like. They could imagine being prisoners in the vast desert, the tarpaper barracks, the mess hall, the fire station. The wind whipped up the sand into our eyes, the tumbleweed rolled on the dunes, the hot sun beat down on us as we walked the trails Being there bonded us together as a family. We could talk about the trauma of camp and commit ourselves to work for justice. When I heard that Minidoka was threatened with a giant wind turbine farm, I felt like we had no chance to fight it. But after attending the many BLM Section 106 zoom meetings, open houses, Friends of Minidoka meetings, writing scoping letters, comment letters, examining the DEIS and the Draft Programmatic Agreement, I realized many different environmental agencies and towns people were upset. They were concerned with the environment , grazing rights, water rights, , farming, ranching, fishing and hunting, and sympathized with the Natives and the Japanese Americans concern over their sacred sites. I began to feel there was a chance we could discourage the project, I appreciate BLM Lava Ridge Subcommittee Final Report which concluded with their decision for Alternative A, no action. Many common concerns were itemized covering historic properties, bird kills, wildlife crossings, grazing and water rights. There were many questions that have not been adequately addressed in the DEIS. I appreciate the extensive space allotted to Minidoka in the DEIS. I am sure such consideration was due to the many comment letters from the Japanese American community and the Langsdon Group interviews that were commissioned to interview Minidoka survivors such as myself. Unfortunately, in the early stages of the Lava Ridge public meetings, I believe the only historic entity consulted was the Jerome Historical Society whose only connection to Minidoka are a few artifacts. As a result the National JACL and the Japanese American Confinement Site Consortium (made of members of the10 incarceration camps) publicized the project and articles appeared in all the major Japanese American press in California, Washington and Oregon. Although many Minidoka survivors live outside Idaho, they will often return because The Minidoka National Historic Site remains an indelible memory. They, as well as the general public, learn and relearn a valuable American History lesson every time they visit the site. Minidoka is an American Concentration Camp and must be acknowledged. When the Lava Ridge Project was announced, It seemed Idaho was wide open for the picking for big industry to swoop in because there were inadequate guard rails. For that reason, we are hopeful that BIM will establish Areas of Critical Environmental Concerns to provide permanent protections as new proposals come up. I believe the Lava Ridge Project awakened BLM and prospective enterprises to thoroughly engage their local communities to make sure their project will be welcomed.on public lands. At one meeting, it was suggested there be a Monument Resource Plan in place to protect whatever resource Idaho want protected. Another person agreed because otherwise they will have to go through the same ordeal over and over again whenever an energy project is proposed. If for some reason, the Lava Ridge Project is allowed to be built in some form, I am hopeful that the provisions described in the Programmatic Agreement in regards to adverse affects will adequately protect Minidoka and the Shoshone-Bannock tribes and all the key cultural sites listed within. If Alternative A is chosen, the headache of managing and monitering rhe giant wind project will disappear, My only choice for the Lava Ridge Project is Alternative A , no action.
12057-6	A. Ben Crouch	16. The windmills will be unsightly, and will ruin and disrupt views, sights, and lines of vision. The environmental impact on our lands far exceeds any potential gains and infringes on the Minidoka National Historic Site. It is bad enough what happened to the Japanese Americans and others when they were unconstitutionally imprisoned at the Minidoka Encampment – but to intentionally encroach so closely to the historic site and ignore cries to not futher insult or desecrate their memories would be irresponsible and tragic.
12059-4	Martin Bender	The final reason I am opposed to the Lava Ridge Wind Project is that if it goes ahead, it could impact a local historical site. One of the proposed areas for wind turbines is around the Minidoka Hunt Camp National Historic Site. Hunt Camp was established in 1942, to house Japanese Americans disinterred from their homes due to fears that they would support a Japanese occupation of the US, and while such fears never came to pass, the camp is nonetheless an important historical reminder of the persecution of an ethnic group in the United States for perceptions that they would give aid to an enemy and something that we should endeavor to make sure doesn't happen again. The fact that a means of generating renewable energy is proposed within the borders of that camp, to me, is disgraceful to the significance of the site and implies that such a historical site is ultimately only useful if the government or a private company can profit from it.
12062-2	Michelle Kumata	I was able to visit Minidoka in 1991 and also last fall. Both times were very impactful, to drive out to the site and walk where our ancestors were unjustly held for years. In 1991, there wasn't much left from the site, but I visited with former incacerees and saw the root cellar and the location of the former camp cemetery. When I visited last October, I read each of the walking tour interpretive panels which included photos, text and quotes that further enhanced and personalized the experience. The barracks and baseball field also helped me imagine the incarcerees daily lives. The Military Honor Roll Wall honors the Japanese Americans that served valiantly in the U.S. military while their families were held behind barbed wire. It was incredibly moving to be able to look out at the vast land and imagine how our people were held in such a massive, barren and isolated site. I felt like I was walking in my ancestors' footsteps. Minidoka is sacred to our Japanese American community and must be treated as such. This is a place where survivors and descendants can go to reflect and heal, honor our ancestors' strength and resilience, and build pride in what they endured. This is a place where everyone can go to experience a hidden chapter of U.S. history and connect the Japanese American incarceration to current social justice issues. The Lava Ridge Wind Project involves 400 wind towers, 340 of which would be visible from the Minidoka NHS Visitors Center. It covers 76,000+ acres, creating a visual wall of towers filling 114 degrees of the Park's 360 degree viewshed. Over a dozen wind towers, as tall as 740 feet, would be located on the historic footprint within two miles of the Visitors Center. The wind towers would be visible from the Visitors Center, behind the Honor Roll wall, the baseball field, and the barracks. I oppose the Lava Ridge Wind Project Project Draft EIS on behalf of my great grandparents, grandparents, parents, siblings, and current and future generations of the Japanese American community. This proposed development will have a detrimental impact on a critical, yet almost invisible part of U.S. history – the unconstitutional incarceration of 125,000 people of Japanese descent. ...

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		I plan to visit Minidoka this summer with my mother, who has not returned to the site since her family left in 1945. She's turning 80 years old later this year. I'm glad she'll be able to experience the site with the historic feel of the land intact, without wind towers crowding the horizon. I am all for renewable energy, but I implore you to consider another site for the Lava Ridge Wind Project that won't destroy this sacred place of healing for our community, and an immersive, educational site for everyone. Preserving and protecting the integrity of the Minidoka site and making it accessible for all visitors is crucial to preserving and protecting U.S. history.
12070-1	Donna Zuck	3.5.3 Minidoka War Relocation Center and Minidoka National Historic Site The Lava Ridge Wind Project would have detrimental effects on the Minidoka National Historic Site and the Minidoka War Relocation Center through the invasion of physical, visual, and auditory pollution from construction and operation of the wind turbines. On page 3-155 the DEIS states "Minidoka NHS is a nationally significant site (listed under NRHP Criterion A) related to civil rights and liberties and American history(NPS 2021:1)." It is important to leave this area as close to how it was in WWII when American citizens of Japanese ancestry from the West Coast lost their rights as Constitutionally described because of their race. Visitors to this site must be able to see, hear, and feel how it was experienced by our fellow citizens. Please protect this site and choose Alternative A - no build.
12079-1	Shawn (Itoi/Nagashima) Brinsfield	On my first arrival to Minidoka, with no one else on site, I was standing alone; softly gazing in the distance. In the quiet, undisturbed moment I felt reverential and a connection. I could 'see' my Nisei mom and her brother strolling not far away as they might have done seventy years before. The silence and the 'pure' surroundings were important in invoking that state of mind; an impactful and emotional experience for me. All my family stories and their memories of Minidoka became real to me at that moment. I walked away with a deeper felt meaning of the family and community history. Since then I have made donations of time and money to support public awareness of the World War Two massive confinement event in Japanese American history; and to memorialize the first and second generations of Japanese Americans who overcame very tough conditions and forces larger than them to have a successful immigrant experience in a land which has given them wonderful opportunities. I support keeping the Minidoka National Historic Site area and view scape a meditative place which supports reflection, contemplation and a unique experience. I do not support a wind turbine farm in that general area. The Minidoka site is sacred. And I can not imagine building a wind turbine complex next to Mt. Rushmore or near the Statue of Liberty.
12080-2	Zoe Barker-Aderem	It is our responsibility to preserve similar opportunities for the families forever altered at Minidoka; as well as to all of us and the potential of the world we might build if we choose to remember.
12084-1	Greg Davidson	I feel the Lava Ridge project as written is a detriment to the visual environment of the Minidoka Containment Historic site. This project is of a size that it will significantly affect the viewshed of this entire region. As we build for our future energy needs we must not make the same mistakes as we have in the past and destroy significant cultural, historic, & scenic resources of this country. I ask the current Proposal be adjusted to remove the sites that fall within the viewshed of the Minidoka site. We have wronged enough American citizens by letting our fear rule our decisions, lets not make a similar mistake by disrespecting them again.
12090-3	Chris Bender	6. This will negatively impact the Hunt Camp WWII Memorial. The Minidoka Mational Historic Site is in the area that will be affected by this project. If you are unfamiliar with it, this is where many Japanese Americans were relocated to Southern Idaho during WWII. This is a heartbreaking part of our nation's history that needs to be preserved, out of respect to those persecuted before us and as a caution that it should never happen again. The thought that this is even being contemplated to be placed here is extraordinarily tasteless, disgraceful, and appalling.
12097-1	Shannon Reagan	I am writing to submit my opposition to the Lava Ridge Wind Project as proposed by Magic Valley Energy, LLC. I urge the Bureau of Land Management to take No Action on the proposal. My concerns are primarily centered around preserving and maintaining Minidoka National Historic Site and its viewshed. While my views align with most, if not all, of Minidoka survivors and descendants, I would like to share a slightly different reasoning for my strong opposition to Lava Ridge. I am not of Japanese American descent. I am a fourth generation Idahoan. I learned of my German roots, French-Canadian ancestry, and pioneer forefathers from a family history compiled by my maternal grandmother, which she painstakingly researched in the late 1980s before the days of easily accessible online ancestry records. She also included first-person recollections of her own experiences as a young woman growing up in Burley during World War II. A short passage in this family history alludes to the incarceration of American citizens at Minidoka: "There was also a camp built…for Japanese American displaced persons from the coast. They were not exactly prisoners, but were not allowed to travel freely. It seemed like a strange situation, but we were assured it was for their own safety." I find this short paragraph chilling. It underscores how little the public knew at the time about the incarceration of their fellow Americans. Yet even today, we still do very little to educate ourselves about this history. That is why it has become my personal mission to educate and inform others about Minidoka's past and present. While I am not personally affected by the generational trauma that Minidoka's survivors and their descendants carry, the drive I feel to share and amplify Minidoka's history cannot be overstated. Over the past several years, I have mentored a group of high school students studying the history of the camp and advised the Friends of Minidoka's first group of high school summer interns. Based on this work, one of those students is currently writing a full-length musical based on life at camp and the reparations movement of the 1980s. I have also educated my own family about the Japanese American incarceration of World War II and taken them to visit both Minidoka and the Topaz Concentration Camp in Utah. I consider this work to be one small way that I can help younger generations understand the fundamental injustice of incarcerating Japanese Americans during WWII. Over the past two decades, it has heartened me to see Minidoka transform from a windblown patch of land amongst the farm fields of Magic Valley into a protected national historic site. But I am disturbed to think of this region surrounded by spinning turbines. Key Observation Point imagery confirms my opinion that Minidoka's viewshed is at risk if the Lava Ridge project is allowed to move forward as proposed. As you are aware, the Idaho State Historic Preservation Office has determined that public land near Minidoka National Historic Site is eligible for listing on the National Register of Historic Places. Additionally, approving any of MVE's existing proposals would directly contradict the BLM's own Environmental Justice Implementation Instruction Memorandum. Furthermore, I am deeply concerned by the development of public land for private gain. To permit wind energy development of any kind within Minidoka's viewshed undermines the dignity of the site, and negatively detracts from the deeply moving experience of visiting Minidoka in person. Minidoka National Historic Site must be preserved and protected from the interests of private energy developers who see the land as little more than an opportunity to turn windpower into profit. In closing, I would like to share an anecdote about my visit to the site last spring when the Friends of Minidoka high school interns and I took a tour with Kurt Ikeda, Director of Interpretation and Education. As we stood in the visitor center breezeway next to the bronze map of Minidoka's original footprint, Kurt asked each of us why we were there to visit. When it was my turn to answer, I looked out across the skyline towards Burley, Idaho, where my grandmother spent her adolescence. I thought of her arriving home from an afternoon matinee to hear the radio blaring news about the bombing of Pearl Harbor. I remembered her recollection of the "strange situation" that was Minidoka. A gust of wind came up, and I thought about what it might be like to look towards my grandmother's hometown from the same place in a few years, with a skyline marred by spinning turbines. I tried to choke back the emotion in my voice as I replied, "My grandmother grew up here, and she didn't understand what was happening just a few miles from her home. I'm here to learn the things she never did." Kurt nodded quietly, directed our attention to the Frank Kitamoto quote above the visitor center door, and asked us to read it aloud together: "This is not just a Japanese American story but an American story with implications for the world." That was a key moment in my personal experience of Minidoka. It validated my resolve to learn and share all I can about its history, while advocating for its future preservation. I cannot imagine that moment unfolding in the same way, or impacting me as deeply as it did, if I had looked towards my grandmother's hometown to see dozens of turbines crowding the skyline. Approving the development of Lava Ridge would be a devastating footnote to the story Minidoka teaches us about American injustice, racial prejudice, and resilience. Wind energy development in and around the site would negatively impact my personal experience and connection to Minidoka National Historic Site, and that of the students I educate. For these reasons, I urge the BLM to take No Action on Magic Valley Energy's proposal.
12107-1	Linda Bosserman	As a third-generation member of the Japanese American community whose parents, grandparents, aunts, uncles, cousins, family members, and friends were incarcerated in the Minidoka Concentration Camp during World War II, even though they were US Citizens, this proposal is an affront to our sensibilities! This proposal to build the 76,000-acre Lava Ridge Wind Farm project near the Minidoka historic site should not be favorably considered by anyone, especially the BLM.

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		Instead, your agency should be communicating with another agency in your family, namely the National Park Service, which included Minidoka in the National Register of Historic Places on July 10, 1979, to preserve the rich history of this important site! We should be making this site easily accessible to citizens, visitors, historians, and students to learn and be educated about this period of time in US history. The decisions stripped away the constitutional rights of US citizens and their immigrant parents, who were legally denied even the possibility of citizenship. This makes the legacy of those decisions that created Minidoka still relevant today! Members of our community, as American Citizens, worked hard to get Minidoka established as a National Historic Site to safeguard it for future generations to learn from this shameful time in American history. If we don't preserve these historic sites and teach future generations about our mistakes, we will be doomed to repeat them again and again. The legacy of what the Japanese Americans who were incarcerated endured is to teach our Nation how to value those that look different. The incarcerated Japanese Americans made the deserts bloom. From behind barbed wire, they sent their sons to join the Army's 442nd Regimental Combat Team of WWII, which became the most highly decorated unit for its size in the history of the US Army — so much so they were nicknamed the Purple Heart Brigade and became Congressional Gold Medal winners in 2011. All this while their families were incarcerated and their rights and livelihoods destroyed. Erasing the desolate landscape surrounding Minidoka that was key to its selection as an internment camp location, as exemplified by the mantra used by realtors …. location, location, location ... contributes to erasing its memory and explicitly the experience of being there, in the middle of nowhere. A 76,000-acre Wind Farm that will not benefit society as much as preserving Minidoka with its visual and experiential effect will! The BLM has a vast inventory of acres of land that it can select from for placement of this Wind Farm … near Minidoka where it will change the landscape is not one of them! I urge you to reject the proposed Lava Ridge Wind Farm project! The wind farm construction would be a disrespectful slap in the face to Japanese Americans and their descendants. It would send the message that the government does not care about the inhumane conditions, pain, and suffering that 13,000 innocent men, women, and children endured for four (4) years at Minidoka. The project would devastate the aura of the Minidoka Internment Camp, one of our Nation's National Historic Sites. The turbines would be visible from the camp. Moreover, the noise and vibration would disrupt the peace and tranquility of this site — a sacred place of memory and healing for Japanese Americans and their families. Instead, it is a place to learn from our mistakes and build a more just and equitable society.
12127-1	Tom Yaguchi	They did this while their families were incarcerated at home behind barbed wire in camps like the Minidoka Camp. The Minidoka Camp, and what is left of the other internment camps are a reminder of what should never happen again in this country. The Minidoka Camp is a National Historic Site, to be honored and respected. The BLM Lava Ridge Wind Farm Project does the exact opposite: it desecrates, it dishonors and it disrespects all of what the 100th Battalion/442nd Regimental Combat Team/MIS fought for while their families were held prisoner behind barbed wire in camps such as the Minidoka Camp. NO TO BLM LAVA RIDGE PROJECT! OPTION A - TAKE NO ACTION!
12136-5	Diane Honda	I urge you to recommend/select DEIS Alternative A and to reject the installation of wind towers in this area based on their impact on the Minidoka NHS, camp survivors/descendants, Native Americans, local residents, and area wildlife. I hope my children, future grandchildren and I can visit the Minidoka historic site and take in the healing experience it provides, today, tomorrow and in perpetuity.
12139-2	Jonathan Narita	It is not the place. Move the project elsewhere.
12143-1	David Brown	I want to voice my opposition to the wind farm proposal on the Minidoka site. I am married to a woman who is 25% Japanese and I have been introduced to the injustices to our Japanese American citizens in the Second World War. I also know people who were incarcerated in Minidoka's concentration camp. I have visited the site on three different occasions and feel that a wind farm would desecrate this memorial to an American tragedy. I voice my opposition to the Minidoka wind farm as proposed.
12146-1	Linda Tamura	Hello. I'm a Sansei, 3rd generation Japanese American. My mother, Chizuna Noji Tamura and her family from Hood River, Oregon - as well as other relatives and friends - were incarcerated at Minidoka after their transfer from Tule Lake during World War II. My father, Harry Tamura, volunteered to serve in our country's armed forces seven days after Pearl Harbor was bombed. I have visited Minidoka a number of times – most memorably with my sister and family from California and have presented and participated in several pilgrimages and programs. Those visits to Minidoka have special meaning for our family because the pilgrimages were times when Nisei and their descendants began openly sharing their horrid past. It has taken years for many Japanese Americans to even acknowledge how they were mistreated by their neighbors, former friends and even by our own government. Psychologists even equate their responses with PTSD (post-traumatic stress disorder). So now learning that the proposed Lava Ridge project would be placed nearby seems to blatantly minimize the impact of this historic site. While I support wind turbines and efforts to provide alternate energy sources, these huge towers will produce noise and visibly detract from the memorial experience of the Minidoka National Historic Site. Our own government admitted in its formal apology in 1988 (Civil Liberties Act of 1988) that the incarceration of Japanese Americans was a grave injustice, motivated by racial prejudice, war hysteria and a failure of political leadership. Placing the Lava Ridge Wind Project nearby denigrates that apology and the memorial to our past. Please discontinue this project and find a reasonable alternative.
12159-3	Marie Matsuno, Dan Sakura	My mom and dad met before World War II. My dad was Japanese American and born in Hawaii. My mom was Aleut. She was born in a village in western Alaska. Before the War, my parents lived in the native village of Ugashik on Bristol Bay. When the government came to take my dad away after Pearl Harbor, my mom decided to go with him, rather than living alone in the village. I was born in Minidoka. There were other Alaska Native people in Minidoka, such as Sam Kito's mother and her family. During the war, my dad, Fred Rock Matsuno, joined the Japanese American 442nd Regimental Combat Team, the most decorated unit of any kind during World War II. I am proud of his military service and hundreds of others like him who joined the military. After we left when I was two, we were able to return to Ugashik, our home village. While we were in camp, our home was taken by others, and to this day I do not know which house that was. After returning to the village, my mom and dad started to rebuild their lives. My parents rarely talked about being incarcerated. For many years, I felt uncomfortable as though I had done something wrong, but perhaps it was that people did not know how to treat us after our home and belongings were taken during the War. Our parents hardly talked about the experience, and we did not know enough to ask questions. Because our village did not have a school, my parents sent my brother (age 12) and me when I was nine to boarding school in Haines, Alaska, which was 1,000 miles away. While we were very homesick for 9 months of year, we were happy to go home in the summer to fish. In 1988, I was grateful that my former boss, Senator Ted Stevens, invited me to attend the bill signing of the Civil Liberties Act in the Department of the Interior auditorium. Senator Stevens was a great man. He had a strong sense of justice. He cared deeply about the experience of the Japanese Americans in Alaska and the relocation of the Aleut people to Southeast Alaska during the war. I am very pleased that the government has recognized the importance of both the Japanese American and Aleut relocations. We are a great nation. And a great nation acknowledges its mistakes. Many years after the bill signing, a longtime friend in Washington state knew about my birth in Minidoka. She offered to drive me to the Pilgrimage. She had an interest because of a family connection. I was happy we went because I wanted to see it for myself. It was an opportunity to meet other people and to hear what camp was like for them. It was wonderful to meet one lady who had been born in camp like I was. The Pilgrimages mean a great deal to people like me since I saw and heard firsthand what life was like for our families at Minidoka. The Pilgrimages are so helpful that I try to make a donation to support seniors who wish to visit. I was also very proud to see our dad's name on the Minidoka Honor Roll. Growing up, I don't recall seeing his Purple Heart or other medals nor did he discuss them or his time in the Army. And even later, I attended the Congressional Gold Medal program in Washington, D.C. and accepted a replica on his behalf. I strongly support the work of the National Park Service to preserve Minidoka's fundamental resources and values unimpaired for the benefit of future generations. I encourage BLM to adopt the No Action Alternative and begin a public planning process for the ACEC.

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12176-2	Julie Boraks	I am totally against the Lava Ridge Windmill project.
12183-1	Russell Davis	Her family was not incarcerated in the Minidoka Hunt Camp but were fortunate to have been long time residents of Jerome County and were able to purchase a farm which just happened to be in the future camp area. Many of her family's friends were people who decided to remain in this area after the camp closed. It is an affront to those people to have this project built so close to the area that holds so much significance to them and to the remembrance of such an embarrassing time in the history of our country. A time which should not be forgotten.
12185-1	Wanda Yamagata	My family was not incarcerated in the Minidoka Hunt Camp but were fortunate to have been long time residents of Jerome County and were able to purchase a farm which just happened to be in the future camp area. Many of our family friends were people who decided to remain in this area after the camp closed. It is an affront to those people to have this project built so close to the area that holds so much significance to them and to the remembrance of such an embarrassing time in the history of our country. A time which should not be forgotten.
12192-1	Terri and James Walker	Secondly, but even more important is the destruction of a valuable piece of history. The internment of the Japanese is a blemish to the US Government. Keeping these monuments alive will help to remind future Americans the grave injustice that was done and hopefully not be done again.
12241-2	Joe Abo	I believe alternative A, no action, is the best plan to maintain as much of the 1942 viewshed as possible.
12287-1	Aura Sunada Newlin	As a member of the Japanese American Confinement Sites Consortium, the Heart Mountain Wyoming Foundation is joining the supporters of the Minidoka National Historic Site in Idaho to call for the selection of Alternative A: No Action in the case of the proposed Lava Ridge Wind Project in Southern Idaho. Our foundation represents former incarcerees at the Heart Mountain concentration camp for Japanese Americans during World War II. We operate a museum and educational organization that teaches Americans about the historic wrong perpetrated against 125,000 people of Japanese descent, two-thirds of them U.S. citizens, during World War II. Part of the experience for visitors at Heart Mountain is to take in the remoteness and isolation of being incarcerated in locations away from the West Coast. That is a key part of the experience for visitors to the Minidoka National Historic Site, and that experience will be endangered by the approval of the Lava Ridge Wind Project. The location of hundreds of industrial wind turbines around the Minidoka site will destroy the area's viewshed and the immersive feeling of isolation that is critical to depicting the incarceration experience at Minidoka. That is why we join the Friends of Minidoka, the Minidoka National Historic Site and the Minidoka Pilgrimage Planning Committee in calling for Alternative A: No Action.
12357-1	Jan Boles	I am a member, an ally, of the Friends of Minidoka. I have resided and worked in Idaho more than 60 years, all that time a friend and colleague of Japanese Americans whose lives were directly impacted by Executive Order 9066. I have come to feel a deep emotional bond with those dear people in my life. As a member/ally of FOM, I endorse and second their position in opposition to the proposed Lava Ridge Wind Project: "No action." As a professional photographer/visual artist who has been documenting the Minidoka NHS since the early 2000s, when I visit the site (my wife and I were last there on April 15, 2023) I visit a shrine. I visit a hallowed memorial to the more than 9,000 Japanese Americans incarcerated there during World War II. Today I visualize those 340 proposed wind towers that were diagrammed in the BLM DEIS, clearly delineated on 114 degrees of arc, nearly one third of the horizon, juxtaposed behind key components of the NHS. Those proposed towers would dishonor the purpose and spirit of the Minidoka National Historic Site. For these reasons I say please, take "No action."
12374-1	Douglas Wilson	Please recognize the vital importance of their concern for the Minidoka Historical site and discontinue all actions you intend to approve placing the wind farm that will cause Japanese Americans to again feel that their government that incarcerated them is still determined to treat them as nothing but a bunch of tourists and again being in the way of a for-profit enterprise. My friendsI have taught me a lesson in compassion and empathy. Please join me in stopping this discretion of the Minidoka Historical site.
12420-1	Sheila Omoto	My mother, an American born citizen, spent her teen years at the Minidoka Concentration Camp. We MUST keep the land a sacred and somber place to honor those that lived through this unjust incarceration for future generations (for ALL people, not just Japanese Americans) to learn, reflect and act justly against discrimination. Minidoka Historic Site is NOT a tourist destination for my family and others like me. It is not a tourist destination for all visitors. When we walk this land it is profoundly moving and to have a wind farm adjacent to it would ruin the experience. BLM has not taken this into consideration in the environmental impact study - it is more than the environment but it is a human impact.
12434-1	Gloria Kawabori	I am a Japanese American who was born in a Japanese Concentration Camp, called Topaz, in the state of Utah. My mother was an American citizen like two thirds of the approximately 120,000 people sent to these ten internment camps which were situated in desolate desert areas across our country. My best friend, Teiko, was born in the Minidoka Camp. Her mother was an American citizen as well, and died in this camp when my friend was only one year old. Teiko visited Minidoka as an adult and went on several pilgrimage trips to the place of her birth. Each time she went to Minidoka, it was an emotional experience allowing her to think deeply about the injustice of the incarceration and the death of her mother. She knew her mother might have lived if she received good medical care and medicines which were not available in the camp. Her pilgrimages to Minidoka helped her to think, heal, and reflect. After her last trip to Minidoka, my best friend was distraught to learn about the Lava Ridge Wind Project which would place wind turbines near this place which has become sacred to her. It is incredible to think that many wind powered generators, taller than our Seattle Space Needle, would be imposed on and/or near this historic site. I strongly urge you NOT to build the wind farm at or near the Minidoka National Historic Site. Minidoka is a reminder not only of a place to heal and reflect, but also to remind us that racism and injustice acts toward any of our citizens is not to be tolerated in our country.

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12438-1	Beth Kawahara	This is to register a plea for a "No Action" decision on the Lava Ridge Wind Project proposed near the Minidoka National Historic site. As much as I support renewable energy the location of this proposal is critically important as well. I lived in the barracks of Minidoka from 1942 to 1945. My family and I survived the extreme hardships of the entire ordeal---the discrimination, the upheaval of the move from Seattle to Puyallup to Minidoka, finding a safe place to store our household goods with hopes that they wouldn't be plundered and stolen. We survived the harsh conditions of camp, with the meager rations, with the lack of privacy, with the brutal winters, with the dust penetrating through the misaligned windows and doors, the walks to the mess hall three times a day on the shoe-sucking, mud pathways as the rain turned the dirt into mud. I remember the numerous conversations, sometimes with tears, but always with a worried look, my parents had as each new crisis came up in the camp. I remember when my dad was buried in effigy, complete with a cross on his grave, when a proposal he was supporting was very unpopular with a segment of the camp parents. So yes, life was very difficult in camp. I have attended two pilgrimages back to Minidoka, and yes, after the initial reality of the experience after seeing the barrack, the one room that five of us lived in for three years, I found it very healing to be back there, reminisce where the schools were, the medical center, canal, the swimming hole, and to listen to the various speakers, to share with others who were also in camp, and to realize that we all survived this horrible upheaval. By installing this huge project on the grounds that bear so much history, and has brought healing to me and many of my generation who had to live through this terrible injustice, it would be a continuation of the original assault.
12442-1	Isamu Kawabori	I am a Japanese American who was interned at the age of two, not in Minidoka but in another internment camp, also located in a God-forsaken desert in the middle of nowhere, Poston, Arizona. The choice of these locations was purposeful by the United States Government. I believe that it is important to preserve the isolation of Minidoka NHS so Americans of any ethnicity who may visit can also feel the impact of the isolation, the dry desolate terrain, and the mountains in the distance. We must preserve this site, and the sight lines, intact. Why? Because we must not repeat our mistakes in the future. We must learn from our past mistakes. Leave the Minidoka NHS and its surrounds natural as a historical site and also respect the Native American grounds as well. This is not the only place a wind power facility can be built. Wind powered generators seven stories tall imposing themselves on and/or near a historic site where the internees felt the isolation and saw desert as far as the eye can see, and the proposal is to put hundreds of wind generators as far as the eye can see? Racism was a part of the reason for internment. For the sake of renewable energy we are considering trashing the Minidoka NHS and disrespecting the cultural sites of Native Americans? I believe we are better than this. This wind farm should not be built here.
12451-1	Ron Sakura	I visited the site back in 2016 and it was quite a solemn experience. It was quiet with a slight breeze and somewhat peaceful. It would have been hard to imagine what my father's family experienced if there were a bunch of oversized wind turbines humming in the background and visible to the horizon. My father was the oldest son of 10 siblings and the entire family and associated members spent most of the war behind barb-wire at Minidoka. My dad and his three brothers were the first Japanese Americans to volunteer for military service on the mainland. Against much sentiment against the violation of their rights of due process as Americans and Anti-Japanese feelings across the entire nation. Two of my uncles served in the Military Intelligence Service (MIS) during the war with their wives and children also at Minidoka. My dad "Kenny" died in 1989 just a year after the Redress Act was passed in congress, which awarded survivors of internment an apology and twenty thousand dollars as compensation. He was one of the older Nisei at Minidoka and was in his 40's at the time. Many Nisei (2nd Generation) people that survived the war did not really care about the money but they did care about the apology that the US government bestowed them 40 something years later. Redress was pushed through congress not by Nisei but by Sansei (3rd Gen) my generation. Those were hard years for most Japanese Americans and it took a very great toll on their emotions and psyche. It took my father around 40 years to come to terms with what happened and Redress was the final chapter, putting an end to his anguish. World War II was hard for all Americans. Imagine if a corporation wanted to put a wind farm next to the cemetery of your fallen relatives. I think you would think this is quite disrespectful of the dead who sacrificed for this country. Minidoka National Historic Site is a symbol and tribute to those who were forced to sacrifice their freedom, self esteem and did their patriotic duty serving in uniform and behind barbed wire. I hope you sincerely consider this fact when deciding to put a wind farm in the backdrop of a national historic site. If you consider this okay you may as well put one on the rim of the Grand Canyon or any other national park or monument.
12454-1	John MacMillan, Kathy MacMillan	We are vehemently opposed to this because it negatively impacts the Minidoka National Historic Site. This has been identified by the National Park Service as an important and critical area to preserve and protect for its historical significance to the country, Idaho and specifically to all Japanese Americans. We personally have had a close friendship with a Hunt Internment Camp survivor. We have always celebrated her strength and fortitude despite this childhood experience. Other survivors and future generations should not see the Minidoka National Historic Site suffer an additional insult and disgrace to themselves as individuals and a culture within the United States.
12456-1	Karena Youtz	This project should not be built. Please choose "NO ACTION." The proximity of Minidoka historical site requires that the land remain as close to its state during the time of the camp. If this project were pursued, it would dishonor history and loss. There is nothing that could mitigate the wind project's impacts in this location. Please have them choose another area in the vast Idaho desert lands. I am interested in this because a person very close to me was incarcerated there. To me, even proposing the wind project is disrespectful and cold, without basic humanity.
12464-1	Rita Takahashi	I am opposed to the construction and maintenance of wind turbines in and around the areas that were once the Minidoka War Relocation Authority camp. The area is of great historical significance, and those affected by the U.S. Government's exclusion and incarceration orders are opposed to developments (including wind turbines) that infringe upon and alter the original grounds. I ask that BLM take the right course by respecting and honoring what the area represents to so many. I urge the adoption of Alternative A, as specified in BLM's impact statement: "Alternative A – No Action, in which the BLM would not authorize construction, operation and maintenance, and decommissioning of the project." Your affirmative action in adopting Alternative A will be valued and appreciated.
12467-1	Charlotte Garrido; Robert Gelder, Edward Wolfe, Dana Daniels; Kitsap County Board of Commissioners	NOW THEREFORE, THE BOARD OF COMMISSIONERS, KITSAP COUNTY, WASHINGTON DOES RESOLVE AS FOLLOWS: Section 1. Kitsap County supports the Department of the Interior's funding increase for Minidoka in the Department's budget request to Congress and supports the reauthorization and renewed funding of the JACS grant program. Section 2. Kitsap County supports the work of the National Park Service to protect Minidoka's integrity, fundamental resources and values for the benefit of future generations. Section 3. Kitsap County also encourages the BLM to engage with members of the Bainbridge Island community during the compliance process for the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Section 4. Kitsap County respectfully requests Washington State's Congressional leaders to work with their colleagues in Congress and with the U.S. Department of the Interior to permanently protect Minidoka National Historic Site from activities on nearby BLM lands that would impair the fundamental resources and values of the park. Section 5. Kitsap County will transmit this resolution to its Congressional Delegation for their use and transmittal to appropriate federal agencies.
12473-1	Tilman Smith	Over the past ten years, I have had the deep privilege of attending the annual Minidoka National Historic Site Pilgrimage many times. As a white American who grew up just after World War II, these experiences have been invaluable to my understanding of American, and especially Pacific Northwest history and culture. What a treasure to all of us to have a living museum that captures and honors the real-life stories of unjustly incarcerated Japanese Americans, as well as the generational impact of the incarceration their families and communities. I am asking you to please prioritize protecting this history for all of us and do NOT move forward with the Lava Ridge Wind Project. One of the most powerful and educational experiences of being on the grounds of Minidoka is actually feeling the isolation of the site. The expansive and desolate landscape brings home the reality of how far away these families were from everything they knew, and how much resilience it took for them to survive such a horrifying ordeal. Please don't erase this history by undermining the integrity of this site and destroying the viewshed that helps us understand the experiences of those incarcerated.

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		I am deeply concerned that by surrounding this sacred site with huge wind towers, along with the immense foot and vehicle traffic that goes with them, that Minidoka will be reduced to a small entertainment park, when in fact it needs to be held as a revered monument to the lessons that we must learn as a country. Not only do we owe it to those incarcerated and their families to maintain this site as it has always stood, but we owe it to all of us to protect this site as the national museum that it is. I am imploring you to enact the NO ACTION alternative; to protect the Minidoka National Historic Park and find an alternate location for the Lava Ridge Wind Project. We must protect this most precious of national monuments for all the generations to come who deserve to fully experience and embrace this critical part of United States history!
12476-3	Rebecca Kenison	I grew up on Bainbridge Island in the 1960s. All of the American citizens of Japanese descent who lived on the Island were incarcerated in Minidoka during WWII. Actually, all of them except the young Japanese-American men who served the United States in our military. I knew many Bainbridge Islanders of Japanese descent who were incarcerated. They lost their homes; they lost their businesses; their lives were upended, never to totally return to normal. The Minidoka National Historic Site has deep historical significance for all of us but particularly for American citizens of Japanese descent. Minidoka provides those who were incarcerated there and their children and grandchildren a place for reflection and healing. The Department's Environmental Impact Statement does not adequately protect the importance of Minidoka and the land surrounding it. American citizens were sent to the middle of nowhere; to construct their own living quarters, their own school, to provide for themselves. They were isolated. That overwhelming sense of isolation and somberness at Minidoka should remain since it is an important aspect of this historic site. DEIS fails to consider that the intense somberness associated with Minidoka is an important part of place, of the history of U.S. citizens incarcerated without trial. [...] To maintain the integrity of the site of Minidoka, its viewshed should not be impacted. Even a "moderate" amount of visual change is significant. Locating turbines on the lands surrounding the Minidoka would amount to an irrevocable and harmful change. [...] I trust respect will be shown to our American citizens of Japanese descent by allowing the Minidoka National Historic Site and land surrounding it to be preserved as a place of reflection and healing without the distraction of turbines in its site lines. And, for the rest of us, that we can learn our history lessons and feel the history of Minidoka deeply without the distraction of turbines in its site lines.
12508-1	Geraldine Shu	When 32 members of our family went on the Minidoka pilgrimage nearly 14 years ago, my aunts & uncles who had been incarcerated there were visiting for the first time in 60 years. It was only vaguely recognizable to them because it was much more lush than they remembered due to subsequent plantings & added irrigation. Recent reconstruction of former structures has been helpful in recreating a more representative version of what Minidoka was like back then. However, future addition of numerous wind turbines to the nearby landscape would be a misconception of the original starkness & desolation that they had endured, giving future visitors & pilgrims the impression that their imprisonment was much more agreeable than it actually was. I do appreciate the need for alternate energy resources but please consider the impact of your choice on Minidoka's historical role in the obstruction of civil liberties. No action or Plan E options in regards to the Lava Ridge project would be preferred.
12528-1	Fred Sakura	I have visited the Minidoka site many times since in 1971 and attended what I believe may have been the first Minidoka Pilgrimage. Minidoka has a very special spiritual meaning to me. Before the war my parents lived in the Eatonville Lumber Company's housing near Mount Rainier in Washington State where my father worked as a dry kiln foreman. His three brothers also worked at the mill. In addition to the spouse and children of my dad's older brother, his younger sister and his widowed mother also lived there. It was a happy vibrant Nikkei community as many of the several hundred workers were Japanese American. Soon after the President signed Executive Order 9066 in February 1942, the owner of the mill was forced to sell his company to a competitor because half of his workforce and their families were forcibly removed and incarcerated in the Assembly Center at the Western Washington Fairgrounds in Puyallup, Washington, then later to Minidoka in Idaho or Tule Lake near Newell California. My parents sold or gave away their new car, dog and belongings and were removed to a barbed wire enclosed temporary prison. There they were assigned to live in a horse stall near the men's toilet under the grandstand. After stuffing a sack with straw for her mattress my mother was terribly sick from the stress, smell, bad food and unsanitary conditions. Since there were no doctors, one had to be found in the local community. When the Doctor finally arrived and told my mother that her "illness" was she was pregnant with me, her only words were, "OH NO!" My parents would never tell us anything about the forced removal from their home and their experiences in Puyallup and the Minidoka concentration camp. Only later in my adult life as we did research for a family history book did we find that my paternal grandmother stood up to an angry crowd that was against Military recruitment in the "camps." Soon after, her four sons volunteered to serve in the military unbeknownst to each other, fulfilling their deceased father's instructions to join the American Army if there was ever a war with Japan. Minidoka life was difficult for the grandparents. Jobs were available for a few dollars a day if you were a citizen which none of the elders were. Family structure broke down. Children ate with their friends and many men went to work outside the camp in the Idaho sugar beet fields and then later left for the Army and the war. My father and uncles were in the Army with the MIS and the 442nd RCT in Europe with one uncle held as a prisoner of war by the Germans. There were rumors that some inmates might be sent to Japan in a prisoner exchange. With much uncertainty for her future my mother's mother who did not want to return to Japan hung herself using my diapers as a noose. She was so distraught she thought death was a better place than living in a tar paper shack in the middle of nowhere while being held a prisoner in a concentration camp when her only crime was looking like the enemy. Even to this day I know nothing about my grandmother who died so alone in Minidoka. None of her children would speak of her or what happened even after we found out where how she died. Her last surviving child still will not talk about her and only will say when asked, "it was so sad" and won't say anything more. When my mother and her father were allowed to leave Minidoka, they returned to the family farm in Woodinville, Washington where "friends" had been allowed to live. After the "friends" were finally convinced to leave the house, my mother said she shoveled trash out the windows because the house was so full of it. Family friends, Floyd Schmoe of the American Friends Service Committee and students from the University of Washington helped grandpa prepare the fields to plant crop seeds before his sons came home from the war. Rev. Emery Andrews, pastor of the Japanese Baptist Church would drive grandpa's truck laden with lettuce to sell at the "wholesale house" in Seattle because if grandpa drove his truck Dave Beck and his Teamsters would not allow the produce of the "Japs" to be unloaded and sold. Now that I'm an Octogenarian, I have tried to leave all the unfortunate anti Japanese and racist rhetoric behind me. But when I see that the Lava Ridge project intends to place a giant Windmill in the footprint of my birthplace, the Minidoka National Historical Site, I wonder if it is another example of an effort to minimize the history and experience of the Japanese American community. Is it another of many efforts by some to minimize the contributions of the Native, minority and immigrant communities in America? The Lava Ridge project would completely destroy the character and change the ecosystem of the site and surrounding area. It would seriously degrade the experience of anyone visiting the Minidoka Historical Site and probably depress the number of visitors learning about the unfortunate decisions to remove and incarcerate nearly 130,000 innocent American citizens and their parents during WWII costing the taxpayers billions of dollars because of racial hysteria promoted by some for political advantage and by others to sell more newspapers. Minidoka is hallowed and sad spiritual place to me. When I visit Minidoka as I often do and walk along the barbed wire fence, examine the old barracks and gaze at the view from the visitor center I cannot help to wistfully think of my grandmother who was so distraught with her situation in life as a prisoner in Minidoka that she decided to end it. When I bring my young grandson to Minidoka for the first time to visit his great grandmother's sprit, what will he experience at the place I spent the first three years of my life? The place where my mother and grandmother washed my dirty diapers by hand in (often) cold water, trudged a long distance in deep mud in winter and swirling dust in summer to take a shower and use the toilet with no privacy. Where they had to haul coal (when it was available) in a bucket to try to keep our barracks warm in the sub freezing winters. Will he notice the dry scrub volcanic high desert BLM land reclaimed into idlic farmlands next to an irrigation canal? Or will his experience be spoiled by a giant spinning, noisy and bird killing wind turbine in his face and hundreds of them stretching as far as he can see? Because of the cumulative effects of this and other wind projects in the vicinity the only option for the Lava Ridge project is No Action (Alternative A) and to support the proposed Minidoka Area of Critical Environmental concern.
12538-1	Clarke Kido	Let me begin by saying that I strongly oppose the proposed Lava Ridge Wind Farm because it would drastically alter the visitor cultural experience and remoteness of the Minidoka National Historic Site. · The general public might not be aware that the Minidoka Site is sacred land to the persons of Japanese Ancestry who were incarcerated during WWII. · My parents, grandparents and over 20 family members endured 3 years of substandard living conditions at the Minidoka War Relocation Center.

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		· My father was allowed to leave Minidoka to serve in the U.S. Army 442 Regimental Combat Team. His name is listed on the Minidoka Honor Roll. · I have visited the Minidoka National Historic Site many times and attended several Pilgrimages and public presentations. I have exchanged family stories with survivors and descendants from Minidoka and other incarceration sites. · On the basis of these experiences and related research, I submitted my opposition comments on October 19, 2021 and June 30, 2022. I participated during the public comment period of the zoom meeting held on August 22, 2022
12559-2	Tammy Duncan	the Lava Ridge Windmill project should NOT be approved. It will significantly impact a site of historial signifigance for Americans. It goes against our own national mandate of Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders.
12574-1	Jan Yamaguchi	In this age of growing movements to attempt to erase the ugly rascist chapters in our nation's history, please don't let the Minidoka National Historic Site be a casualty of that effort! As we all should know, we must continue to learn from our past mistakes, or we will be doomed to repeat them in the future. And to dismiss those who have made the pilgrimage to the site for healing and reflection as "tourists and recreationalists" is insensitive and wrong. The site is a distinct symbol and reminder of how thousands of Japanese Americans during WWII were cruelly uprooted from their homes and businesses, families broken apart in many instances, that we must never forget...
12645-1	Tika Bean	The impingement of the Lava Ridge Wind Farm Project on the Minidoka National Historic Site is yet another insult to Japanese Americans (living and dead). The Minidoka National Historic Site holds special meaning for many incarcerees who are still alive The construction of a wind farm on this important historical site is belittling, insulting, and betrays the significance of the Japanese American story. It also diminishes the struggle to find solutions and answers to the racism, violence, incarceration, and hate that still exists today in America.. The noise and the presence of grotesquely tall, untested, 400 wind turbines would seriously impinge and diminish the important work, both cultural and historical, from being successfully executed by the educational staff at the Minidoka National Historic Site.
12652-1	Peregrin Spielholz	I disagree with the Lava Ridge wind project proposal and Draft Environmental Impact Statement. The impact does not identify that this project would cause a degradation of resources and is at best culturally incompetent, and at worst is racist. Members of my community continue the healing process each day from the incarceration of Americans at Minidoka. My friends who visit are not tourists and are not there for recreation. They are there to heal. Impacting the greater site by placing wind turbines or placing them within the visual field of the site would significantly damage this critical place. It is important to our greater community and country that this place is preserved in its current state as a place of remembrance so that we can continue to learn, heal and make sure that this never happens again.
12657-1	Tony Mazzella	Revisit this project's footprint to insulate the commemorative legacy of illegal and immortal incarceration of our fellow Americans.
12671-2	Sarah Suzuki	In conclusion, the Lava Ridge Wind Project, as currently proposed, would have significant adverse effects on the Minidoka National Historic Site and its visitors. I urge the BLM to carefully consider the points raised in this letter and work towards a solution that respects the site's importance for the Japanese American community, the survivors, and the broader public in understanding and learning from this dark chapter of our nation's history.
12676-1	Steve Justus	In my opinion, Wind Turbines in and near the Minidoka National Historic site would in so many ways be an insult to the suffering of the thousands that were held prisoner there and their descendants. The site should be maintained as it was when it was operational.
12684-1	Monique Jong	The impingement of the Lava Ridge Wind Farm Project on the Minidoka National Historic Site is yet another insult to Japanese Americans (living and dead). To have been exiled from our homes and imprisoned in concentration camps was horror enough. Now that we have been allowed to return to attend pilgrimages at Minidoka, many have begun an unexpected process of healing through memory, tears, and quiet reflection. The Minidoka National Historic Site holds special meaning for many incarcerees who are still alive in my family: I, who was born in the Minidoka hospital in 1944; my relatives who held Buddhist funeral rites for my second cousin, Sgt. Frank Hachiya; the children of my brother, Paul Hiroaki Morita who was drafted into the army from Minidoka, my brothers, Mototsusgu Morita Jr, and Claude Goro Morita, who went to school in Minidoka, and my brother, Claude, who delivered telegrams to sorrowful mothers in Minidoka. The construction of a wind farm on this important historical site is belittling, insulting, and betrays the significance of the Japanese American story. It also diminishes our struggle to find solutions and answers to the racism, violence, incarceration, and hate that still exists today in America.. The noise and the presence of grotesquely tall, untested, 400 wind turbines would seriously impinge and diminish the important work, both cultural and historical, from being successfully executed by the educational staff at the Minidoka National Historic Site. The presence of ugly wind turbines on this site would surely evoke deep resentment where it is not intended. The Lava Ridge Project, if implemented, will become a permanent reminder of the persecution and the will of the government to further pervert our lives by allowing LS Power to scar the land where we once toiled, cried, and shared memories and stories.
12692-1	Juliane Shibata	I ask you to consider the historical significance of Minidoka National Historic Site and be respectful of those who were relocated there, as well as their descendants. I strongly feel that the Minidoka site should be preserved. Talks with individuals and allies in the Japanese American community should continue to work out a solution.
12812-1	Steve Evans	As regards the proposed Lava Ridge project, I am very concerned about its negative impact upon the Minidoka Historic Site and the surrounding important historical lands. Should these areas be overtaken by this massive commercial enterprise, they will never be retaken. Also, the land itself is an important part of our state's native landscape, and it will be irreparably harmed by this project. For these reasons, I am opposed to the granting of permission for this project to be constructed.
12824-1	Janice Abe	Our first visit to Minidoka was in the early 1990's with our 3 young children. We wanted to experience with our kids the place that severely impacted our grandparents and parents We almost didn't find the site as there were no signs or markers anywhere. We stopped to talk with several Twin Falls residents who had little or no knowledge of Minidoka. After driving through a dry, deserted and very remote area, we spotted a small sign indicating the location of the internment camp. All that was present at that time were remnants of what we guessed was the entrance guard house, lots of tumbleweeds and the creek that swiftly ran through the area. That experience impressed upon us how solemn, lonely and desolate the area was that was home to tens of thousands Japanese-Americans during WWII. The next time we visited the site was in 2017 when we attended a Minidoka pilgrimage. We were glad to learn that the site was currently being maintained by the U.S.National Park Service and that it was designated as a National Historic Site. As we toured the camp, its ominous guard tower, the restored buildings and structures, the Minidoka Honor Roll and the historical captions, it was apparent how important it is to protect and preserve this site and its surrounding land. Visiting Minidoka is an educational and immersive experience which makes clear the devastating and harmful effects of prejudice, racism and injustice. Minidoka in its present state is a place of healing and refection for all who were interned and their descendants. The presence of huge wind turbines will negate those feelings of somberness, isolation and loneliness that enhance one's experience and understanding of the Japanese-American Internment. It is critical that one experience the physical remoteness and emotional distance from all that is normal to truly acknowledge the extreme courage and perseverance of our ancestors. In the future, we hope to take several members of our extended family back to the Minidoka site so they too can personally contemplate and reflect on what life was like for their ancestors during their internment. Please do not destroy or detract from that experience for future generations.
12826-1	Clarence Moriwaki: Bainbridge Island City Council	NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF BAINBRIDGE ISLAND DOES RESOLVE AS FOLLOWS: Section 1. The City of Bainbridge Island supports the Department of the Interior's implementation of President Biden's day one executive order to advance racial justice by including a funding increase for Minidoka in the Department's budget request to Congress and supports the reauthorization and renewed funding of the JACS grant program.

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		Section 2. The City of Bainbridge Island supports the work of the National Park Service to protect Minidoka's integrity and fundamental resources and values unimpaired for the benefit of future generations. The City supports protective measures on nearby BLM land to protect the park's immersive setting, views of distant mountains and sense of remoteness, feeling and association. Section 3. The City also encourages the BLM to engage with members of the Bainbridge Island community during the compliance process for the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Section 4. The City of Bainbridge Island respectfully requests the support of its elected officials in Congress to work to ensure that the Department of the Interior does not approve the Lava Ridge Wind Project in any way that will negatively affect the integrity and fundamental resources and values of Minidoka.
12852-1	Robert Hirai	The historical significance of Minidoka to my family is tremendous. It is a site of one of the most egregious acts enacted by the federal government -- a culmination of a long history of racist and discriminatory treatment of Asians and their descendents. The Minidoka National Historic Site and Visitors Center is vital to the education and awareness of generations to come. It is a place that promotes the connecting of generations, the healing of emotional wounds, and the learning of an important piece of Idaho/US history. It is the site of an injustice that should never happen again. This is sacred ground. One thousand young men from Minidoka volunteered to fight for the very country that imprisoned their families. Some were part of the famed 442nd regimental combat team - the most highly decorated unit of its size in military history. Seventy three of these men never came home. One hundred ninety three people died at Minidoka during their incarceration -- far away from their homes, their friends, their neighbors, their American dream. The building of a wind farm in such close proximity would dishonor the sacrifices made by my mother and all those who were incarcerated at Minidoka. I urge the Bureau of Land Management to consider an alternative site for this project. The protection of all historical sites is of significant importance to future generations. One question: Would this project even be considered if the property in question were Gettysburg or Mount Vernon? I think not. "No Action" on the Lava Ridge Wind Project
12877-3	Emily Yoshioka	Given my and my community's concerns regarding the Lava Ridge wind project, I support Alternative A (No action). I believe this is the only choice that protects, preserves, and respects the Minidoka National Historic site for current and future generations.
12878-1	Karen Kawaguchi	As a Japanese American whose family was incarcerated at Minidoka during WW2, I strongly object to the Lava Ridge Wind Project, a commercial-scale wind energy facility of up to 400 turbines proposed to be constructed on approximately 84,000 acres of Federal, State and private land about 25 miles northeast of Twin Falls in south-central Idaho. This project would desecrate Minidoka and the memory of Japanese Americans who were incarcerated there. Find another location for this project.
12885-1	Chuck Roehrich	Regarding the proposal to put a wind farm on land on and around land where the Minidoka Japanese internment site - just don't do it. This is history. Would the Government consider desecrating the little bighorn battle site, or Bull run? No. The land, the scenery, the remoteness, the vegetation, the very debris on the ground are all part of the history. The places chosen for these internment camps were all out of the way, isolated locations and were purposely chosen to hide them from general public knowledge and sight because the government knew it was wrong. How could anyone think that entire families with children, grandmothers, careers, and some with generations of living here were somehow dangerous? No, people knew. And yet it was done. People who make the journey to visit these sites can walk around, see, hear, feel, contemplate, and in a small way know what it was like. The presence of the windmill towers would irreparably interfere with the experience. The ground itself makes it real. People can learn the history more directly than in any other way and decide that we should guard ourselves as a nation from ever doing anything like this again. There is immense value to this. Don't do it.
12928-1	Lois Saito	There is tremendous significance to the proposed site, Minidoka prison. My father's entire family was incarcerated at Minidoka. All of his siblings, including himself, were US citizens. The proposed wind farm site would be an insult to the Japanese Americans incarcerated there. The wind farm would be a visual eyesore for all who go to the Minidoka Visitors Center. It would detract from the feeling of being desolate, isolated, & a feeling of despair Minidoka is a National Historic Site. This shows the significance of this sacred site. I am not opposed to the wind farm project but it should be relocated to an alternative area. If the BLM's families had been imprisoned at Minidoka they too would be opposed to the wind farm location. There is always an environmental impact statement but consider the personal impact statement of the significance of Minidoka where 10,000, most of which, were US citizens were in prisoned. Please take into consideration the meaning of this sacred proposed site.
12960-1	Karen Hirai Olen	I am writing to oppose the Lava Ridge Wind Project. I urge you to select Alternative A. Three generations of my family were incarcerated at Minidoka National Historic Site. I was born in Minidoka and I am neither a visitor nor a tourist to the site. The construction and operation of the massive turbines will destroy the historic nature of solitude and serenity of a Site of Conscience and will further denigrate the 13,000 incarcarees and their descendants. The massive towers, the transmission towers, the overhead transmission lines, the shadow flicker, the noise destroy the viewshed and the solemnity of the site. These intrusions on the traditional sanctity of the site are an affront to the honor, the dignity and the suffering of all incarcerees and their descendants. Minidoka must be preserved as a traditional Historic property. The Lava Ridge project will cause irreversible and irretrievable damage to the Minidoka National Historic Site. It is my understanding that the proposed 740' tall, 3MW or 6MW turbines have not been built. This makes the data on the impact of the project speculative and/or extrapolated from other sites. The project area of 200K+ acres and an APE of 1.8 million+ acres must be developed and implemented with hard data. I have the following concerns: • The true effects of the construction phase • The true effects on the aquifer when the wells are drilled. • The true effect on all the other wells in the area • The true effect on the viewshed of the Minidoka National Historic Site. • The true effect on the current migration patterns of the wildlife, avian species, pollinators, bats • The true effect on the habitats of sage grouse, owls, raptors, pollinators. • The real death rates of the bald eagles, golden eagles, bats, pollinators. • The true noise levels and the effect on all wildlife, cattle, area residents and their pets. • The true effect of light flicker on all wildlife, cattle, crops, area residents and their pets. • The effects of the project on the four adjacent counties. • The true effect on prehistoric sites in the area.

Comment ID	Sender	Public Comment
		I think that this vast project has too many unknowns to be approved. I strongly urge you to select Alternative A as the only appropriate choice.
12961-1	Janet Baba	During World War II, I was imprisoned with over 120,000 people of Japanese heritage. My family of five lived at Minidoka and in Tule Lake, for a total of about 3 years. I"m asking for the Lava Ridge Wind Project be located elsewhere - than near the Minidoka National Historic Site. Please find another site for the Lava Ridge Wind Project, as I am deeply concerned about our environment. Please preserve our Minidoka Camp Site, away from an area of deep painful year for my family, and find another location for the Lava Ridge Wind Project. • Save Minidoka Camp Site • Build Lava Ridge Wind Project elsewhere – away from Minidoka camp site
12963-1	Larry Watson	consider myself a native Idahoan as I was born in and have lived in Idaho for eighty-one years. I have enjoyed and tried to be a good steward of our public lands. While the forested, federal lands of central and northern Idaho are beautiful and special, so are the public high desert lands of southern Idaho where the Lava Ridge Wind Project is proposed. I am totally opposed (100 percent) to the project for the following reasons: 1) the visual scape would be transformed forever; 2) the possible damage to the aquifer that we depend on for human and economic needs is too fragile; 3) the fragile ecosystem would transform to the point-of-no-return; and 4) the project would show disrespect the Japanese-Americans who were illegally interned there during World War II. Their history and painful legacy must be protected at all costs. For these reasons I do not support the Lava Ridge Wind Project.
12980-1	Kyoko Oda	I am writing today to express our concern regarding the proposed wind project in Minidoka, Idaho. As an organization that seeks to preserve historical sites, we strongly believe that this project be stopped immediately. There are several reasons why we are advocating for the cessation of this project: First of all, it will negatively impact the wildlife population in the area. There are · several endangered species that inhabit the region, and the construction of a wind farm would pose a serious threat to their habitats. Secondly, the wind project would also have a significant impact on tourism and local businesses. Many individuals visit this area for its historic area, and remember their ancestors living in one of America's Concentration Camp located in Minidoka, Idaho. The peaceful and natural surroundings would be greatly disturbed by the large wind turbines and would not only detract from its inherent beauty as a place once lived on by their ancestors, but also disturb descendants and visitors of Minidoka's historical home to a large population of Japanese Americans whose parents and grandparents suffered and survived in Minidoka. Their stories belong to the future generations who will visit their ancestors' home during WWII. Many of America's Concentration Camps have been given historic status. Recognition of such sites will serve as opportunities to educate future generations about the importance of protecting everyone's rights and freedom, especially in times of national crisis.
12981-1	Kayo Hayashida Ong	I am a survivor of 2-1/2 years behind barbed wire fences at Minidoka. It's a solemn place - a reminder of war hysteria, prejudice and hardship suffered by my family because my immigrant grandparents were born in Japan. Leaving home on Bainbridge Island, WA, and transplanted to southern Idaho we faced a desolate land - treeless, dusty and void of all but packed earth and rows of tar papered barracks. Return trips as an adult remind me that this is a unique place in our Country's history. The quiet, open spaces, dotted by a few restored buildings under open skies, allow for reflection and tears. Why? Why? Why would the BLM permit a monstrous wind farm to pollute the sky and disrupt the quietude so near to this special place to those of us of Japanese descent who worked to bring life to this land? Are we less worthy of our rights as in 1942? Why? Why would the BLM allow the constant 'whoop' 'whoop' noise of the turning arms pollute the quiet? Why choose this flat land when the wind would be more efficient on higher ground? Would a massive wind farm be considered for the Black Hills? for Yellowstone? or other place set aside for future generation to reflect on the history and import of these places? You are charged to consider the impact and lasting importance of your decision. There are several alternatives balancing economics and conservation away from this historic site. The Minidoka National Historic Site needs your decision to preserve this area as a solemn, reflective place for future generations.
F1-4		Construction of a wind project in this location could compromise Minidoka's ability to convey the setting in which Japanese Americans were imprisoned and degrade the park's ability to heal and ensure that this does not happen again. The federal government should not compound the damage it has already inflicted upon the Japanese American community at this site.
F5-1		Please stop this windmill project as it will destroy a national landmark that is important to preserve. We must preserve its purpose of honoring and remembering our past American ancestors that experienced incarceration wrongfully. We must also pass our story along to future generations. And this landmark is there to educate current and future generations in hopes of stopping future generations from repeating past atrocities.
F5-2		Please stop this windmill project as it will destroy a national landmark that is important to preserve. We must preserve its purpose of honoring and remembering our past American ancestors that experienced incarceration wrongfully. We must also pass our story along to future generations. And this landmark is there to educate current and future generations in hopes of stopping future generations from repeating past atrocities.

Issues or Resource Topics

Air Quality

Table A-3a. Air Quality

Comment ID	Commenter	Public Comment	Response to Comment
11488-1	Lari Perron, Teresa Perron	One of the many problems with Lava Ridge is the amount of dust the miles and miles of new roads are going to create. If the ground is not covered with vegetation the wind blows the dust into the air something terrible. Will they be watering these roads often enough with the 40,000 truck loads of cement and numerous other vehicles that will be passing over them to keep the dust from the air? The 2023 Air Quality Report of the American Lung Association shows Idaho's air quality is harmful to health. This project will add to the overall problem and will be a huge impact to the health of the people in a large radius. Dust can travel many miles. What written guarantees are in place to make sure this problem is addressed and also what recourse is available if the construction companies are not abiding by the requirements? Will they be replanting along side the roads and towers to replenish the vegetation as quickly as possible? This is not only a problem during construction but the ground will continue to be blown around for years afterward because these dirt/gravel roads will need to be maintained.	See EIS Section 3.2.1.2.2 (Alternative B [Proposed Action], Alternative B with Additional Measures) and Section 2 (Project Construction and Emissions) of the project air quality technical report (SWCA 2022) for a list of mitigation measures to control fugitive dust emissions. MVE would finalize the project Dust and Emissions Control Plan, which would have to be approved by the BLM prior to construction. The draft Dust and Emissions and Control Plan is MVE (2023) Appendix O. The BLM would be responsible for enforcing the terms and conditions of the ROW authorization (throughout the life of the project), including mitigation measures for dust. The BLM would require MVE to do this, keep a log, and submit to the BLM on a regular basis. The log should also note any instance when watering was not conducted with an explanation.
11491-32	Dean Dimond, Jennie Bateman	21. Need State DEQ air quality, water quality and safety issues in construction and ongoing,	See EIS Section 3.2 (Air Quality) for the EIS air quality analysis. Impacts to surface water quality are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-49. Health and safety issues are also discussed in Table App3-1; see AIB-10 through AIB-14.
11508-5	Justin Gott, Daniel Gott, Josie Gott	I understand there will be over 400 miles of service roads built. If they are gravel roads it will cause a lot of dust to be stirred up in the area affecting wildlife. Also to keep the dust down a dust abatement could be applied which could leak into the aquifer.	See response to comment 3811-4 (in Table A-3v, Soils) regarding impacts from application of dust palliatives. EIS Section 3.2.1.2.2 (Alternative B [Proposed Action], Alternative B with Additional Measures) and Section 2 (Project Construction and Emissions) of the project air quality technical report list mitigation measures to control fugitive dust emissions. MVE would finalize the project Dust and Emissions Control Plan, which would have to be approved by the BLM prior to construction. The draft Dust and Emissions and Control Plan is MVE (2023) Appendix O.
11535-45	Steven Andersen	The Monument RMP provides that the lands are classified as Class II under the Clean Air Act. The DEIS has no evaluation of whether its operations will comply with this standard. 40 CFR 93.150-160 requires an approved implementation plan. MVE is required to apply the General Conformity Regulations to its action. The DEIS should have clearly indicated project emissions in the construction and decommissioning years and whether it would exceed General Conformity de minimis thresholds, and if so, establish a plan for developing the air quality conformity analysis, addressing plans for satisfying General Conformity, and describe plans for releasing a draft general conformity determination and Final Determination.	EIS Section 3.2.1.1.1 (Regulatory Background) discusses Class II areas and general conformity. As stated in this section, because Jerome, Lincoln, and Minidoka Counties are in attainment for all criteria pollutants, the General Conformity Rule does not apply. At the request of the NPS, an additional Class II area was evaluated against Class I thresholds. EIS Section 3.2.1.2.2 (Alternative B [Proposed Action]) discusses the results of the VISCREEN Level-1 visibility screening analysis that demonstrated that project construction would not cause a visible plume that would cause any visibility impairment inside Class I or Class II special consideration areas. The same section also discusses the preliminary screening analysis using the EPA's AERSCREEN model, which demonstrated the modeled NO_2 (1-hour and annual) and PM_{10} (24-hour) emissions to be below their respective NAAQS at the boundaries of the Class I area and the Class II special consideration area. This is discussed in additional detail in the air quality technical report (SWCA 2022) (see Section 5.1 and 5.2).
11535-46	Steven Andersen	The fugitive dust analysis in the DEIS is inadequate and assumes a 2-year construction period, which is unrealistically short given the magnitude of what is being proposed. Because the engineering for the project has not even occurred, the DEIS is underestimating the construction time-frame. Further, the dust source control is limited to application of water but fails to specify exactly when, how, where, with what regularity such application would occur. Moreover, there is no indication of committed efforts to limit earth-moving equipment.	See response to comment 11488-1 (see in Table A-3a, Air Quality).
11598-23	Idaho Conservation League	Air Quality The Air Quality Technical Report for the Lava Ridge Wind Project (AQTR)20 provides the foundation for which the BLM analyzed the air quality impacts of the project in the DEIS. In particular, the AQTR and DEIS highlight the issue of fugitive dust generation as the driving source behind particulate matter (PM) impacts. Specifically, the AQTR states, "Applicant-committed measures to control fugitive dust emissions include routine watering and installation of base coarse and gravel on access roads. In addition, and as discussed in the POD, a dust and emissions control plan (DECP) would be prepared prior to construction. The AQTR then proceeds to list multiple specific monitoring and control requirements that MVE has committed to.21 Beyond this, the AQTR goes on to further highlight even more additional fugitive dust control measures that MVE has committed to employ.22 The Measures and Additional Measures described provide prudent initial guidance on fugitive dust control. One significant example is Measure 111: Where necessary, water may be used as a dust control method during construction and would be applied on unpaved roads, material stockpiles, and other surfaces that can create airborne dust. Roads would be watered at intervals sufficient to control dust. Water spray would be controlled so that pooling would be avoided to the extent possible. 20 Prepared for BLM and MVE by SWCA Environmental Consultants, revised October 2022 21 AQTR, Measure 110 through 116, page 2. 22ATQR, Additional Measure a through i, page 3. While the Measure offers some specificity, phrases such as "where necessary" and "intervals sufficient to control dust" are ambiguous and assumedly left to be discussed in future DECP. A thorough review of the EPA's AP-42 Chapter 13.2.2 Unpaved Roads emission factors and guidance will impart the importance of the technical science and web of variables that influence fugitive dust generation and control. Figure 13.2.2-5 of Chapter 13.2.2 specifically identifies how the quantity and frequency of water spray significantly affects their control efficiencies. Among other critical fugitive dust generation and control variables are examples such as road silt content, mean vehicle weight, surface material moisture content, and mean	MVE would finalize the project Dust and Emissions Control Plan (in accordance with the Idaho Department of Environmental Quality guidance, which would have to be approved by the BLM prior to project construction. The draft Dust and Emissions and Control Plan is MVE (2023) Appendix O. Details such as those requested in the comment would have to be approved by the BLM prior to notice to proceed with project construction.

Comment ID	Commenter	Public Comment	Response to Comment
		vehicle speed. Considering this, ICL stresses the importance of MVE developing, and BLM approving, a DECP that is sufficiently detailed, specific, and comprehensive. While the values for the critical variables that went into estimating project fugitive dust emissions are not publicized in the AQTR or the DEIS, a well developed DECP is essential to ensuring the project is constructed and operating in such a manner that is consistent with those assumed variable values. The unspecified phrases highlighted in Measure 111 above, may be appropriate for the AQTR and DEIS, but the DECP must include a much deeper dive into specific details. A substantive DECP must address the following: How will the level of fugitive dust emissions be monitored? Will the EPA's Visible Emissions Field Manual EPA Methods 9 and 22 (December 1993) be used? Will onsite monitoring equipment be employed? How much water will be applied? How often will it be applied? Will application frequency be evaluated qualitatively or will it be tied to EPA Method 9 or 22 observations? Without a DECP that adds the sufficient level of detail needed to successfully implement Measure 111 and many of the AQTR listed Measures and Additional Measures, the public cannot be confidently assured that the project will not have significant air quality impacts.	
11978-7	Magic Valley Energy, LLC	Table 3.2-5 – Air Quality for Alternative B 8. MVE Comment: MVE would like to confirm that the sulfur oxides (SOX) numbers in table 3.2-5 reflect the use of ultra-low sulfur diesel (ULSD) in equipment. ULSD contains 97% less sulfur than low-sulfur diesel, which was commonly used prior to 20071. If the DEIS used outdated data from low-sulfur diesel in the calculation, a correction to ULSD would be warranted to show accurate SO2 emissions (i.e., 0.30 tons of SO2 per year for off-road construction equipment).	Yes, the values in EIS Table 3.2-6 use the EPA's MOVES emission factors, which incorporate the latest ultra-low-sulfur diesel standards (EPA 2022d).
11978-8	Magic Valley Energy, LLC	Table 3.2-5 and Table 3.2-6 – Air Quality for Alternative B during Construction and Operation 9. MVE Comment: The percentage of estimated total construction emissions per county given in each of the tables is not representative of the amount of emissions the Project would have in each of those counties. The DEIS currently calculates each county emissions using 100% of the Project's emissions. Given that there are three counties, this would equate to 300% of the Project's emissions. A simple, yet more accurate method, is for the FEIS to pro-rate emissions to each county based on disturbance acreage within each county and then calculate percentages accordingly.	The text has been revised to include apportioned emission comparisons.
11978-9	Magic Valley Energy, LLC	Section 3.2.2.2– Air Quality Operational Impacts 11. MVE Comment: The DEIS lists estimates of air pollutant emissions due to operation of the Project but excludes air pollutants that will be avoided due to operation of the Project. The DEIS provides estimates of avoided emissions in Section 3.4 (Climate and Greenhouse Gases); see Table 3.4-4 (Alternative B), Table 3.4-7 (Alternative C), Table 3.4-8 (Alternative D), and Table 3.4-9 (Alternative E). As shown in these tables, the avoided air emissions due to the Project's wind energy generation will be significant and are relevant to the Project's operating phase annual emission rates. To ensure that the FEIS provides the available information and adequately discloses the anticipated effects of the Project, these avoided emissions need to be incorporated into the annual operation phase emission estimates disclosed in the Air Quality section in Table 3.2-6 (Alternative B). Additionally, the operating phase avoided emissions for each alternative should be documented in Section 3.2.2.2.3 (Alternative C), Section 3.2.2.2.4 (Alternative D), and Section 3.2.2.2.5 (Alternative E).	The text has been revised to include the avoided emissions and add the avoided emissions to EIS Table 3.2-9 and in EIS Sections 3.2.2.2.3 through 3.2.2.2.6.
11991-7	Julie Abo	If the project goes forward, will there be a measurement of air quality effects to see that this projection is correct? (page 3-23)	See response to comment 11488-1 (see in Table A-3a, Air Quality). MVE would finalize the project Dust and Emissions Control Plan, which would detail how dust emissions would be controlled. No, a measurement device would not be set up and operated for the duration of the project. The draft Dust and Emissions and Control Plan is MVE (2023) Appendix O.
12338-7	National Park Service	Section: 3.2.1 Air Quality Page: 3-10 The NPS recommends revising the following statement from the draft EIS on page 3-10: "Because of the nature of air pollutants, which become more spread out as they travel away from a source of pollution, the air quality analysis area for both issues extends approximately 31 miles (50 kilometers) in all directions beyond the siting corridors (Figure 3.2-1). A 31-mile (50 kilometers) radius was chosen to be consistent with minimum air quality analysis required for major source air quality permitting." The draft EIS appropriately discusses the Federal Land Manager's Air Quality-Related Values Work Group (FLAG) visibility modeling recommendations for near-field assessments on page 3-14. However, the statement on page 3-10 is inconsistent with FLAG recommendations for far-field air quality related value impacts. Far-field impacts and analyses are often conducted for sources well beyond the 50-km radius described in the analysis.	The text has been revised.
12338-8	National Park Service	Section: 3.2.1.2.2 Air Quality Page: 3-18 & 3-19 The NPS recommends removing the comparison of construction-related criteria air pollutant emissions as a percentage of county level emissions and propose that it be replaced with the emissions calculations and nearfield modeling analyses of anticipated downwind concentrations to draw conclusions regarding potential project-related ambient air quality and Air Quality Related Value (AQRV) impacts. These results specifically address the predicted impact of the project in the local area and provide more meaningful context for project-related emissions.	Comparison to the county emission inventory helps to add context in terms of the level of emissions. EIS Section 3.2.1.2.2 (Alternative B [Proposed Action]) and the air quality technical report (SWCA 2022) discuss the VISCREEN and AERSCREEN screening analyses conducted for compliance with the NAAQS.
12398-12	US Environmental Protection Agency	Potential Impacts to Air Quality Because the project may result in impacts to air quality, EPA recommends the FEIS include: • Updated information on expected air quality permits, including types, from IDEQ and conditions to protect air quality. • Predicted project construction, maintenance, and decommissioning emissions and a determination of whether emissions will exceed National Ambient Air Quality Standards (NAAQS). The DEIS indicates that, "pollutants generated by the project construction were not modeled". The document includes a conclusion without justification that, "it is unlikely that project construction emissions added to background concentrations would violate the NAAQS and the analysis area would remain in attainment for all criteria pollutants."14 While this may be true, data are needed to show it will be the case. This is important because the project will involve more than 1.5 million vehicle trips per	See response to comment 11598-23 (see in Table A-3a, Air Quality). The text has been revised to include additional permit discussion. Furthermore, the text has been revised to remove the statement, "it is unlikely that project construction emissions added to background concentrations would violate the NAAQS" because modeling was conducted to confirm this (see air quality technical report). EIS Section 3.2.1.2.2 (Alternative B [Proposed Action]) and the air quality technical report (SWCA 2022) discuss the VISCREEN and AERSCREEN screening analyses conducted for compliance with the NAAQS.

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		year and a disturbance of up to 9,114 acres that could result in significant fugitive dust emissions. • Plans to monitor air quality conditions on the analysis area and taking corrective actions to prevent local air quality deterioration. Monitoring strategies tailored to local conditions will ensure that localized air quality impacts do not exceed standards when area-wide and/or long- term monitoring data may show compliance with air quality regulatory requirements. This is especially important for the project due to its proximity the Craters of the Moon National Monument and Preserve, a Prevention of Significant Deterioration Class I area. Because of the project, there is also potential for significant local air emissions due to fugitive dust releases during ground disturbing activities, use of access dirt roads and cumulative effects from surrounding activities. • Plans to coordinate with IDEQ and other entities in the area, such as County Air Quality Boards, to ensure compliance with the NAAQS and related regulatory requirements throughout the 34- year project period.	The mitigation measures listed in EIS Appendix 4 (Mitigation) would reduce effects to the level that monitoring is not needed.
12398-13	US Environmental Protection Agency	The DEIS describes current air quality conditions within the analysis area and EPA appreciates information provided, especially on baseline emissions, general conformity rule applicability analysis, and Prevention of Significant Deterioration. Although affected counties are currently in “attainment” with all criteria pollutants and General Conformity is not applicable to the analysis area, local air quality may still be impacted due to cumulative impacts from surrounding activities such as road construction and site operations, traffic on unpaved roads, local traffic emissions, agriculture, fire, and air traffic. It is also possible that changes in climate could more likely lead to increased air pollution due to future wildfires.	Additional text was added to EIS Section 3.2.1.1.6 (Existing and Future Trends and Actions) and Section 3.2.1.2.7 (Cumulative Impacts) to address climate change and cumulative impacts where they may overlap with the project. Additional text was added regarding impact to local air quality. Regarding PSD, this is a NEPA analysis and not a PSD analysis. A PSD analysis is the responsibility of IDEQ.
13008-4	Scott Hauser	The DEIS (Appendix 0) provides little to no discussion of how dust will, or will not, be controlled on access roads. Given the amount of traffic during construction, dust may become a human hazard while driving.	See response to comment 11488-1 (see in Table A-3a, Air Quality).
2106-1	Jack S. Williams	I'm concerned about all the wind farms being constructed and the impacts on both the local environment and the broader area environmental impacts. Basically, if the energy is absorbed by the wind farms what impacts are there to the downwind environments? What study/modeling has been completed to define the impacts of these wind farms on our micro and macro environments?	Because turbines do not absorb or block wind, wind would still occur downwind of the turbines. Downstream impacts of the turbines in terms of climate change are discussed in EIS Section 3.4 (Climate and Greenhouse Gases), and any impacts would likely be offset by providing a renewable source of energy that reduces the need for fossil fuel combustion.
2932-1	Scott Prow	I would like to draw your attention to The Lava Ridge Wind Project Draft Environmental Impact Statement (EIS). On page 3-15, figure 3.2-2, titled "2021 Wind rose for Twin Falls Sun Valley Regional Airport, Idaho." There is not an airport, anywhere, with that title. Twin Falls, ID has Joslin Field/Magic Valley Regional Airport (KTWF), Hailey, ID has Friedman Memorial Airport (KSUN), and Bullhead City, AZ has Sun Valley Airport (A20).	These data were taken from the Midwest Regional Climate Center. Although the meteorological station is named TWIN FALLS SUN VLY RGNL AP, the location of the station (42.4819 / -114.4869) is that of the Magic Valley Regional Airport.
3141-1	Scott Prow	I would like to draw your attention to The Lava Ridge Wind Project Draft Environmental Impact Statement (EIS). On page 3-15, figure 3.2-2, titled "2021 Wind rose for Twin Falls Sun Valley Regional Airport, Idaho." There is not an airport, anywhere, with that title. Twin Falls, ID has Joslin Field/Magic Valley Regional Airport (KTWF), Hailey, ID has Friedman Memorial Airport (KSUN), and Bullhead City, AZ has Sun Valley Airport (A20).	See response to comment 2932-1 (see in Table A-3a, Air Quality).
3302-4	Susan Canham	How can between 1,800,000 to 2,500,000 vehicle trips be considered "minor air pollutant emissions"?	As discussed in EIS Section 3.2.1.2.2 (Alternative B [Proposed Action], Alternative B with Additional Measures) and in Section 2 (Project Construction and Emissions) of the air quality technical report (SWCA 2022), on-road emissions would be temporary and spread over large areas and would not be cumulatively concentrated in a small area.
3340-8	Sue Page	According to the air quality surveys in the EIS, there will be an increase in air pollution during the project’s construction. This will be from the estimated 2.2 MILLION vehicle trips per year on the newly constructed roads, the heavy machinery used to haul and construct the turbines, the excessive blasting, and the many diesel generators that will be in operation for the duration of the construction. One of the pollutants is Sulfur Dioxide. It is estimated that 64.76% of the SO2 and other sulfur oxides in the air in Jerome county will be attributed to the construction period of the LRWP. SOs can harm the human respiratory system, especially in people with asthma and in vulnerable children. SOs can harm plants and trees by damaging foliage and decreasing growth. But no worries…according to the EPA, the levels of sulfur oxides in the air will still fall within “safe” levels. This same EPA has also said the air was fine in Palestine, Ohio. I’m sure the residents of that community beg to differ. Will LS Power be held liable for the potential increase in respiratory ailments?	Impacts from the project, as well as the VISCREEN and AERSCREEN screening analyses conducted, are discussed in EIS Section 3.2.1.2.2 (Alternative B [Proposed Action]) and in the air quality technical report (SWCA 2022). It should also be noted that the NAAQS are set with a margin of safety to protect sensitive populations.
5896-6	Mike Tylka	ll of the alternatives present vehicle trips in the millions except Alternative A. Trips in the millions with vehicles powered by diesel or gasoline will spew billions of additional pollutants into the air, CO, Nox, Sox, and the like. Stationary equipment such as generators, cranes and other ancillary equipment running constantly will add to the mix. Any proposed “electric” vehicles are currently propelled by coal or natural gas burned somewhere else. Land disturbance created by using existing or newly built roads will create dust pollution that does not currently exist. Building 400 tower pads will add to this, especially due to the amount of basalt that will need to be blasted.	Impacts from the project as well as the VISCREEN and AERSCREEN screening analyses conducted discussed in EIS Section 3.2.1.2.2 (Alternative B [Proposed Action]) and in the air quality technical report (SWCA 2022).
5920-4	Kelly Varelmann	500+ days of construction and heavy equipment will surely degrade the surrounding highways and roads more than normal. Will the extra dust created by the multitude of heavy equipment, trucks, concrete trucks, etc traveling on the dirt roads exceed EPA standards?	See response to comment 6511-4 (see in Table A-3a, Air Quality).
6511-4	Kelly Varelmann	500+ days of construction and heavy equipment will surely degrade the surrounding highways and roads more than normal. Will the extra dust created by the multitude of heavy equipment, trucks, concrete trucks, etc traveling on the dirt roads exceed EPA standards?	As discussed in the air quality technical report (SWCA 2022), on-road emissions would be temporary and spread over large areas. Mitigation measures to control fugitive dust emissions are discussed in EIS Section 3.2.1.2.2 (Alternative B [Proposed Action], Alternative B with Additional Measures) and in the air qua64lity technical report. As mentioned in those sections, roads would be watered at intervals sufficient to control dust. Furthermore, MVE would finalize the project Dust and Emissions Control Plan, which would detail how dust emissions would be controlled. The draft Dust

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			and Emissions and Control Plan is MVE (2023) Appendix O. It should also be noted that the NAAQS are set with a margin of safety to protect sensitive populations.

Avian and Bat Species

BATS

Table A-3b. Bats

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10442-2	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Bats P. 3-43 In the DEIS it is stated, " The cumulative impacts of numerous facilities with high fatality rates across the landscape could compound the impacts on bat populations. The potential effects of the expansion of wind energy on the bat populations in the analysis area would depend on several site-specific variables at each project location, the number and size of turbines that would be used, and the implementation and effectiveness of mitigation measures to reduce impacts to bats." Comment: Bat population declines are problematic for a host of reasons. Bats provide ecosystem services including pollination and pest control . They are one of the most diverse groups of mammals but are not well understood, and recently have been placed at great risk from wind energy projects and from white-nose syndrome. Oregon State University-Cascades' Northwestern Bat Hub studies indicate that the hoary bat decline is consistent with the hypothesis that the longer projects exist and the more extensive they are, the greater the impacts are on species through collision and barotrauma. We are encouraging a further review of the immediate area and other potential sites.	The link between wind energy development and the decline in populations of migratory tree bats, including the hoary bat, is discussed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). As part of MVE's bat acoustic monitoring surveys, WEST deployed several acoustic monitoring stations in the siting corridors and surrounding region to characterize seasonal variations in bat use and evaluate bat activity at potential roost sites and foraging areas. In addition to these project-specific monitoring stations, WEST obtained data from acoustic monitoring stations in the siting corridors and surrounding region that are part of the North American Bat (NABat) monitoring program, which is administered by the Oregon State University-Cascades' Northwestern Bat Hub. The description of hoary bat in the Affected Environment section for species analyzed in detail (EIS Section 3.3.1.1.2) discloses the evidence from the peer-reviewed literature that hoary bat populations have recently experienced large population declines, including the evidence presented in Rodhouse's et al. (2019) study of the Northwestern Bat Hub's NABat monitoring data. It is important to note that Rodhouse et al. (2019) made no conclusions as to the relationship between the size or operational duration of wind energy facilities and their relative impact on bat populations. The authors note that their conclusions must be considered provisional in nature due to the limitations of their study, and go on to say "Hoary bat migration patterns are still not well described, and it remains unclear where the hoary bats that occur in our study region during summer monitoring are being killed [by wind turbines] . . . seasonal hoary bat occurrence patterns . . . suggest [that] bats that occur in our region during summer could spend winters in and migrate through regions where turbine densities are much higher, offering a possible explanation for decline in the Northwestern United States. Although available evidence supports the working hypothesis that regional hoary bat decline is likely caused by elevated adult mortality from turbine collisions and barotrauma during fall migration, our results reflect net cumulative impacts, and a limitation of our study is the imprecision with which stressor impacts can be ascribed." Despite the uncertainty remaining in the relationship between wind energy development and bat populations, the EIS takes the precautionary approach of assuming that fatalities from collisions with operational turbines may result in significant impacts to the populations of certain bat species without the implementation of measures to minimize or avoid collision fatalities. The species analyzed in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) also include those that are generally considered to have a low risk of colliding with turbines but whose populations may become increasingly sensitive to small sources of mortality due to the potential effects of the continued spread of WNS in the West. The potential for significant impacts to bats was considered early in the planning process and, in addition to MVE's baseline resource studies for bats and roosting habitat, the BLM conducted a thorough review of the publicly available scientific literature and coordinated with state and federal wildlife agencies to obtain additional data and expert input. As described in EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment), recently published summer bat occupancy maps produced by the NABat Monitoring Program clearly show that bat occupancy in the Snake River Plain is substantially lower than surrounding areas, which is consistent with the low bat activity observed during summer bat acoustic monitoring surveys. Where concentrated bat use has been observed in the siting corridors and vicinity (such as the irrigation canals and lava crater roost site), protective buffers have been incorporated to prevent turbine siting near these features (see applicant-committed measures 136 and 138 and additional measure n in EIS Appendix 4 [Mitigation]). Although many other measures have been incorporated to minimize or avoid impacts to bats, postconstruction bat fatality monitoring would be required and adaptive management measures would be implemented as needed if high fatality rates are observed. Together, these measures demonstrate that adequate consideration has been given to the siting of the facility and the potential impacts to bat populations. A detailed evaluation of alternative sites for the project is beyond the scope of analysis in this EIS because they would not address the BLM's purpose, which is to respond to MVE's ROW grant request.
11226-4	Clare Josaitis	The number of projected bat fatalities is breathtakingly obscene, even if underestimated. USGS.gov states "Dead bats are found beneath wind turbines all over the world. It's estimated that tens to hundreds of thousands die at wind turbines each year in North America alone" More literature on bats and bat fatalities should be referenced in the EIS than just the two cited to thoroughly research effects of the proposed Lava Ridge turbines on bats.	The analysis presented in the EIS is based on a thorough review of the available scientific literature, coordination and consultation with state and federal wildlife agencies, and the results of MVE's baseline resource surveys. A number of additional sources related to bat fatalities at U.S. wind energy facilities were reviewed and incorporated into the EIS analysis in response to comments received during the public scoping period, including journal articles that had been published subsequent to the initial literature review conducted for the draft EIS. For a complete list of data sources, see the Bat Populations and Roosting Habitat section of the Literature Cited list in EIS Appendix 10. Also see Section 9.0 (References) in the BBCS (Appendix M in MVE [2023:M-64 to M-73]).
11282-1	Karen Schumacher	According to the Data Quality Act, federal agencies are required to ensure and maximize the quality, objectivity, utility, and integrity of information (including statistical information) and data. In the DEIS the data provided on the effects of	The EIS has been updated to include a reference to EPRI (2020a), which examined 277 publicly available studies from 181 different wind energy facilities in the U.S. and Canada (1998 to 2018). The study found that bat fatalities

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		wind turbines on the avian population is biased, inadequate, and the integrity of that information does not support the actual death rate or damage caused by wind turbines. The data used is also significantly outdated such as the 2005 BLM data on fatality rates of bats as being 1-2 per turbine (pg 3-44). While the DEIS does "suggest" that larger turbines has led to a higher fatality rate, however that is then negated with "uncertainty in the relationship between turbine characteristics and bat fatality rates remain" from a 2016 study. It also doesn't identify what "larger turbines" means, or identify the height of the turbine being referenced. In contrast to the referenced study on bat fatalities per megawatt from 2018 as being 3 with lower rates in Idaho, below is a link to a 2020 study that shows the bat fatality rate in Idaho is actually 9 per megawatt in 2014 (pg 17), and that is from your often referenced source of information in the DEIS, West. https://west-inc.com/wp-content/uploads/2021/07/WEST_2020_RenewWildlifeFatalitySummaries.pdf This is just one example of biased, outdated, and poor data being used that clearly justifies the decision for Alternative A, No Action on this project.	peaked at intermediate turbine sizes and decreased at larger turbine sizes but concluded that there was only a weak correlation between bat fatalities and turbine size or capacity. Although the EIS summarizes the information from the 2005 PEIS, including the estimated bat fatality rates, the estimated fatality rates presented in the EIS are based on more recent postconstruction monitoring studies at other wind facilities in the region as described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B). Page 17 of EPRI (2020a) indicates the highest bat fatality rate that has been observed in the Pacific Region is 9.3 bat fatalities/MW/year, which represents a single year of data from a single facility in Idaho. Other studies from the Pacific Region had lower bat fatality rates, which is consistent with the fatality estimates presented in the EIS.
11429-1	Felicia Poteet	The wind turbines are a huge disturbance to the ecosystem of Idaho, [...] One small example is the number of Idaho bats killed by wind turbines each year. There is a change in air pressure near the wind turbines that pops blood vessels around their lungs and kills them. Bats are an important part of our agricultural ecosystem, as they are natural predators to many agricultural pests.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), “Bat fatalities from barotrauma (due to rapid changes in air pressure near spinning turbine blades) have been documented, but there is little evidence to suggest that this is an important source of mortality at wind energy facilities (AWWI 2016).” Table 3.3-3, also in this section, summarizes estimated bat fatalities by action alternative (without the implementation of mitigation). EIS Section 3.3.1.2.2 also describes the mitigation measures that would be implemented to minimize or avoid impacts to bats; a complete list is provided in EIS Appendix 4 (Mitigation). As described in response to comment 11753-3 (see in Table A-3b, Bats), there have been no studies quantifying the impact of bat fatalities at wind energy facilities on local insect populations, but mortality of these insects would also increase as a result of collisions with operational turbines.
11484-1	Liz Niccum	I am concerned about the enormous adverse effects the proposed Lava Ridge Wind Turbine Project would have on the bat populations and roosting habitats in the Magic Valley. Because it is difficult to predict accurately how many bats would be killed by the Lava Ridge Wind Turbine Project, everything concerning bat fatality rates in the EIS is an educated guess: "Fatality estimates for the project are based on the fatality rates observed at other wind facilities in the EPA North American Deserts Level I Ecoregion, and the fatality rate for the project would fall within the range observed at other wind energy facilities in this region." (Page 3-29 of the Lava Ridge Environmental Impact Statement.) Since the planned Lava Ridge Wind Turbine Towers will be significantly higher at 740 feet, how can these statistics from other wind energy facilities with lower tower heights accurately predict bat fatality rates for the project? By introducing much taller wind turbines into areas where bat populations and migrations exist, the potential for bat fatalities increases because studies have shown that bats fly at high altitudes and are essential for farmers because of their consumption of crop-damaging insects that travel at high altitudes. https://www.batcon.org/article/bats-aloft-a-study-of-high-altitude-feeding/ "The rapid expansion of wind energy facilities across the United States is one of the greatest threats to the viability of many migratory bat species" (Page 3-55 of the Lava Ridge Environmental Impact Statement) If this trend continues, how long before many bat species will be listed as endangered? Bats are far too important to the survival of society through food production and the abatement of crop destroying pests to carelessly destroy them with the rapid expansion of wind energy project on public lands like Lava Ridge and other proposed projects in the west. In addition, White Nose Syndrome disease is wreaking havoc on bat populations in the west. How long before Idaho sees evidence of this disease as well as other states? We stand at a crossroads environmentally. Which is more important? Destructive to the environment, short term wind turbine projects fueled by tax incentives or real environmentalism that seeks to preserve and protect nature? Bats are too important to continue this destruction by constructing higher wind turbines in areas of bat migration and habitation.	Bat fatalities are presented on a per MW/per year basis rather than per turbine/per year basis to account for the larger size of turbines with higher generation capacities. EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) presents information on bat foraging and migratory behavior, including site-specific data collected during bat acoustic monitoring surveys for the project. This section also describes the status of WNS in Idaho; additional details on WNS are provided in the cumulative effects analysis in EIS Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts). EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B) acknowledges the difficulty in accurately predicting bat fatality rates prior to construction and provides a range of potential fatality estimates to allow for a reasonable comparison of the magnitude of effects that could be expected for each action alternative. Mitigation measures implemented for bats include postconstruction fatality monitoring, which would provide an opportunity to assess bat fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed; see EIS Appendix 4 (Mitigation) and the BBCS (Appendix M in MVE [2023]). As described in response to comment 11753-3 (see in Table A-3b, Bats), there have been no studies quantifying the impact of bat fatalities at wind energy facilities on local insect populations, but mortality of these insects would also increase as a result of collisions with operational turbines.
11534-11	Matt Arnold, William Eubanks	The DEIS Does Not Adequately Explain Its Conclusions Concerning Irretrievable and Irreversible Commitments of Resources The plain language of NEPA makes clear that every EIS must include “a detailed statement by the responsible official on . . . any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” 42 U.S.C § 4332(C)(v). This requirement is animated by NEPA’s core policy of informing both decisionmakers and the public about what is truly at stake in any given major federal action. Disclosure of these resources is crucial because they help define the pre-NEPA status quo and when the Act’s review must occur relative to project implementation. Forest Guardians v. U.S. Fish & Wildlife Serv., 611 F.3d 692, 714-15 (10th Cir. 2010) (“In order for us to conclude that an agency has engaged in predetermination, we must decide that the agency has irreversibly and irretrievably committed itself to a plan of action that is dependent upon the NEPA environmental analysis producing a certain outcome, before the agency has completed that environmental analysis.”); see also Metcalf v. Daley, 214 F.3d 1135, 1143 (9th Cir. 2000) (holding that an agency conducts NEPA analysis “too late in the decision-making process” when it does so “after making an irreversible and irretrievable commitment of resources”). For this reason, among others, accurately explaining and defining these resources is crucial to the NEPA process. Yet, the DEIS’s conclusions here about the Project’s irreversible and irretrievable commitments of resources are little more than non-sequiturs. Take, for example, its discussion of the Project’s impacts on bats. The DEIS concedes that “collision with wind energy turbines is one of the leading causes of bat fatalities in North America,” and “recent studies on the effect of turbine collisions on migratory bats indicate that population-level impacts could occur due to sustained mortalities from collisions with turbines during migratory movements.” DEIS at 3-44 (emphasis added); see also id. at 3-53 (discussing dramatic declines in populations of Little brown bats, a cave-dwelling species, and acknowledging that “even the relatively small number of fatalities that would occur under [the proposed alternative] could exacerbate the decline in their populations”). But when disclosing the Project’s “irreversible and irretrievable commitments” of resources, the DEIS suddenly changes tune, claiming that although “[a]ll action alternatives would irretrievably impact individual bats through fatalities caused by collision with turbines over the 30-	Irreversible and irretrievable effects are disclosed at the end of each resource analysis in EIS Chapter 3 (Affected Environment and Impacts). The Forest Guardians v. USFWS and Metcalf v. Daley cases cited in the comment are related to the timing of NEPA and the mandate that agencies not take actions that involve resource commitments until the NEPA process is completed, not the requirement at 40 CFR 1502.16(a)(4) that agencies disclose the irreversible and irretrievable commitment of resources that would result from implementing the Proposed Action. The BLM has not issued a ROD for the project yet, nor has any ROW or other permit or authorization been granted to MVE. Irretrievable commitments refer to impacts that would occur over the life of the project but that could be renewed or restored following the project, while irreversible commitments refer to those impacts that are permanent and cannot be restored; see EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) for additional details. EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Summary of Alternative B and Alternative B with Additional Measures) intentionally uses the word “could” rather than “would” when describing the potential for project-related fatalities to impact bat populations because of the uncertainty in the current and future population sizes and trends due to the lack of empirical data and potentially confounding variables such as WNS, climate change, and the ongoing development of technologies to reduce bat collisions with wind turbines. The conclusion in EIS Section 3.3.1.3 (Bat Populations and Roosting Habitat, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) that impacts to individual bats would be irretrievable but that impacts to bats would not be irreversible is based on the best currently available scientific data and literature and the implementation of a robust mitigation plan for bats. EIS Section 3.3.1.2.2 describes how the facility has been sited to minimize the potential for high bat fatality rates and a number of other proactive measures that would be implemented to avoid impacts to bats, such as avoiding turbine placement within 0.25 mile of known bat roosts (additional measure n) and 1,000 feet of the irrigation canals (applicant-committed measure 138), and feathering turbine blades when wind speeds are below the manufacturer’s cut-in speed (applicant-committed measure 160). Because it is not possible to predict postconstruction bat fatality rates from the results of preconstruction acoustic monitoring, the

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		year operation period, [] these effects would not be irreversible because they would be unlikely to result in a trend toward listing under the ESA or a loss of population viability." Id. at 3-57. This conclusion is problematic for a number of reasons. To begin with, the DEIS never explains why a population-level impact or "population viability" is the appropriate threshold for irreversibility under NEPA when tens of thousands of bats will be killed (presumably permanently) each year the Project operates. See id. at 3-46 (summarizing bat fatalities by alternative). Nor does the DEIS explain how "listing under the ESA" affects this conclusion. Id. at 3- 57. As the Greater sage-grouse demonstrates, large and important portions of a species' population can be eliminated without it being listed under the ESA. See 12-Month Findings for Petitions to List the Greater Sage-Grouse (Centrocercus urophasianus) as Threatened or Endangered, 75 Fed. Reg. 13,910, 13,988 (Mar. 23, 2010) (finding that petition to list western sub-species of Greater sage-grouse "is warranted but precluded" due to other bureaucratic priorities). And, a species may suffer irreversible and irretrievable losses to its population from federal projects long before an ESA listing is even contemplated. Regardless of the metric, the DEIS's discussion of bat impacts demonstrates that its conclusion about irreversible losses is internally incoherent or, at the very least, lacks a cogent but necessary explanation. How can it be possible that the Project will not "result in . . . a loss of population viability," DEIS at 3-57, when "population-level impacts could occur due to sustained mortalities from collisions with turbines during migratory movements," especially since wind projects are "one of the leading causes of bat fatalities in North America," id. at 3-44, and those fatalities "are likely to rapidly increase over the next 30 years with the rapid anticipated growth of wind energy" id. at 3-56? BLM never says.10 The final EIS must rectify these issues to satisfy NEPA.	mitigation plan for bats includes a minimum of 2 years of postconstruction bat fatality monitoring (applicant-committed measure 150) to assess actual bat fatality rates. The TAC would be responsible for evaluating the results of this postconstruction fatality monitoring and, if high fatality rates are observed, recommending appropriate adaptive management measures (including curtailment; see applicant-committed measure158 and additional measure y) to the BLM Authorized Officer who would make the final decision on which measures to implement. Additional monitoring would be required to assess the effectiveness of adaptive management measures (applicant-committed measure 159), and compensatory mitigation may be recommended by the TAC and implemented by the BLM Authorized Officer, if warranted. The TAC's recommendations will be based on the best available data, literature, and technology at that time. Additional details are provided in EIS Appendix 4 (Mitigation) and the BBCS (Appendix M in MVE [2023]). The estimated fatalities in Table 3.3-3 do not account for the implementation of mitigation measures, and actual bat fatalities are expected to be lower. Impacts to bats would be considered irreversible if they caused a loss of population viability or trend toward federal listing because the population may not recover, or may take many years to recover, after the impacts of the project cease, whereas impacts that do not cause a loss of population viability are not irreversible because the population would remain large and healthy enough to replace any bats killed as a result of the project. A "trend toward listing under the ESA" (not ESA listing itself) is considered synonymous with a loss of population viability because it indicates the species may need management intervention to prevent further declines.
11534-14	Matt Arnold, William Eubanks	The Project's Potential to Exacerbate Bat Population Losses Due to White-nose Syndrome Merits Additional Scrutiny In discussing the Project's impacts on bats, the DEIS forthrightly acknowledges the serious existential threat that White-nose Syndrome poses to bat populations. DEIS at 3-38 (Bat "species have recently experienced major population declines due to the spread of [WNS], a disease caused by the fungus Pseudogymnoascus destructans," and "even a small increase in fatalities could have population-level impacts for those species whose populations have already been significantly reduced by WNS."). The DEIS also explains that the fungus causing WNS has been detected on the Project's doorstep, representing a "moderate" to "high threat" for Big and Little brown bats in the Project area, respectively. DEIS at 3-43. When describing the additive mortality caused by the Project's operation, BLM provides no information about what the presence of WNS portends for these bat species. Instead, BLM claims that the "magnitude of this effect is difficult to determine given the lack of site-specific information on little brown bat populations and the uncertainty surrounding the impact that WNS will have on the little brown bat population in the analysis area over the 30-year operation period." DEIS at 3-50. Given that BLM estimates the Project may kill "several thousand" Little brown bats during the life of the facility, and that this "species is at a high risk of being extirpated" from areas where WNS has been detected, id., it is incumbent on BLM to do more than simply throw up its hands and ask, "who knows?" If, as seems likely, the Project will directly contribute to the extirpation of an entire species of bat, BLM has a duty to inform the public, including conducting "new scientific studies" about area-specific abundance in order "to fully and fairly analyze the impacts" of this Project. League of Wilderness Defenders, 752 F.3d at 763 (cleaned up). BLM should also explain what "uncertainty" surrounds the impact WNS will have on cave-dwelling bats, and why a complete analysis of WNS in conjunction with the Project is not feasible in the DEIS. DEIS at 3-50. As far as SLR is aware, WNS has been studied extensively by academics and the U.S. Fish and Wildlife Service, including detailed models about its spread. See Meredith L. McClure et al., Projecting the Compound Effects of Climate Change and White- nose Syndrome on North American Bat Species, CLIMATE CHANGE ECOLOGY, December 2021; see also Suzanne M. O'Regan et al., Multi-scale Model of Epidemic Fade-out: Will Local Extirpation Events Inhibit the Spread of White-nose Syndrome?, 25 ECOLOGICAL APPLICATIONS 621, 632 (2015) ("[O]ur analysis indicates that disease-associated mortality within counties will not inhibit large-scale spread of white-nose syndrome at the county level and that, at a minimum, over 80% of counties of the contiguous United States are likely to become infected before the current epidemic is over.").12 Thus, BLM is capable, especially with assistance from federal wildlife scientists from sister agencies, of evaluating the Project's anticipated impacts to bats, in combination with WNS, using well-established statistical models that account for various scenarios of decline due to WNS and other stressors. This is precisely what NEPA and its regulations require. See, e.g., 40 C.F.R. § 1502.21(b), (d) (directing agencies to "include information in the [EIS]" regarding reasonably foreseeable significant adverse effects if "the overall costs of obtaining it are not unreasonable," and this "includes impacts that have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence").	The potential for WNS to lead to future declines of cave-hibernating bat populations in the analysis area is disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat), and species-specific risk factors are discussed in greater detail for species analyzed in detail (i.e., big brown, little brown bat, and western small-footed bat populations). Other cave-hibernating species that occur in the analysis area were also evaluated for potential declines due to WNS, as described in Table App 3-2 in EIS Appendix 3 (Issues Analyzed in Brief). As described in Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts), "Because WNS is not yet widespread in the western United States and it is unknown how rapidly the fungus that causes the disease will spread or how differences in hibernacula between the eastern and western United States will affect disease transmission, it is difficult to assess the magnitude of WNS on bat populations over the 30-year operation period. However, if WNS has a similar impact on bats in the western United States, some species could experience significant declines from the cumulative impacts of the expansion of both WNS and wind energy development (including the project)." As described in Section 3.3.1.1.3 (Bat Populations and Roosting Habitat, Existing and Future Trends and Action), WNS and its impacts on bats are well studied in the northeastern U.S. where the disease first appeared, but there is greater uncertainty in how WNS will impact bats in the western U.S. because the *Pseudomonas destructans fungus* has only recently been detected in this area and has not yet led to widespread infections or mortality. To comply with 40 CFR 1502.2(b), the EIS summarizes the conclusions in the available literature rather than recounting the detailed discussion of individual factors contributing to this uncertainty. As described in the study by Cheng et al. (2021) discussed in this section, the threat posed to individual bat species by WNS varies due to a number of factors including winter roosting behavior and the types of hibernacula used. Neubam and Siemers (2021) found that bat swarming behavior during migratory periods may also affect WNS transmission in the western U.S. (the citation for this study was inadvertently omitted in Section 3.3.1 of the EIS but was correctly cited in EIS Appendix 3 [Issues Analyzed in Brief]). Despite early concerns raised about the potential spread of WNS to the western U.S., such as those in O'Regan et al. (2015) study referenced in the comment, the fungus has not spread as rapidly as predicted, as acknowledged in the McClure et al. (2022 [2021 used in the public comment is an incorrect date]) study referenced in the comment as well as the study by Neubam and Siemers (2021) referenced in the EIS. In addition to uncertainties in the rate of WNS spread, there is also uncertainty in how western bat species whose populations have only recently been exposed to *Pseudomonas destructans* will respond to the fungus because some species infected with the fungus never develop symptoms of WNS (such as the western small-footed bat , Mexican free-tailed bat, silver-haired bat, and Townsend's big-eared bat) and because the response in bat populations to WNS varies between species (see for example big brown bat and little brown bat in Section 3.3.1.1.2 [Affected Environment, Bat Populations]). The McClure et al. (2022) study adds further uncertainty to these impacts by providing evidence that warming from climate change will mediate the impact of WNS in the west because the *Pseudomonas destructans* fungus thrives in cooler temperatures. Given the uncertainty in the rate of WNS spread in the western U.S., the lack of information on transmission pathways, and the variability in impacts between species, any attempt to further quantify the risk WNS poses to western bat populations would be highly speculative. Despite these uncertainties, the analysis in the EIS takes the conservative approach of assuming that WNS will lead to large declines of some bat species in the analysis area over the life of the project, and discloses the potential that even a relatively small number of fatalities from turbine collisions could have significant impacts on these species. Postconstruction bat fatality monitoring would be implemented to determine the actual bat fatality rate and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatality rates; additional details are provided in the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation). McClure, L.M., C.R. Hranac, C.G. Haase, S. McGinnis, B.G. Dickson, D.T.S. Hayman, L.P. McGuire, C.L. Lausen, R.K. Plowright, N. Fuller, and S.H. Olson. 2022. Projecting the compound effects of climate change and white-nose syndrome on North American bat species. *Climate Change Ecology* 3(2022):1000047.

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			O'Regan, S., K. Magori, J. Tomlin Pulliam, M.A. Zokan, R.B. Kaul, H.D. Barton, and J.M Drake. 2015. Multi-scale model of epidemic fade-out: Will local extirpaton events inhibit the spread of white-nose syndrome? *Ecological Applications* 25(3):621–33. Available at: https://pubmed.ncbi.nlm.nih.gov/26214909/. Accessed December 29, 2023.
11535-25	Steven Andersen	The agency wholly fails in its responsibility to take a hard look at the irreparable impacts the proposed project will have on bat population generally. The agency relies on faulty data to form its inadequate baselines for fatality rates and roosting impacts, and underappreciates the magnitude of this project given its unprecedented size. The DEIS admits that the "high concentration of volcanic features, such as lava tubes, vents, craters, and caves that provide roosting habitat for a variety of bat species, throughout the SFO planning area and at CRMO, which is less than 10 miles northeast of the siting corridors[,]" was not even visited.81 This is especially concerning considering the fact that, as the DEIS admits, the "Townsend's big-eared bat (Corynorhinus townsendii) is the most commonly recorded species" at those locations, "and most (64%) known maternity roosts for the species in Idaho" are within that area.82 The Townsend's big-eared bat is an important species in Idaho, but barely considered in the DEIS.	The analysis presented in the EIS is based on a thorough review of the available scientific literature. A number of additional sources related to bat fatalities at U.S. wind energy facilities were reviewed and incorporated into the EIS analysis in response to comments received during the public scoping period, including journal articles that had been published subsequent to the initial literature review conducted for the draft EIS. The BLM also solicited input from IDFG, USFWS, NREL, NPS, and other relevant agencies during the development of the analysis in the EIS. As described in Table App3-2 in Appendix 3, the Townsend's big-eared bat was dismissed from detailed analysis in the EIS because it has never been recorded as a fatality at a wind energy facility.
11535-26	Steven Andersen	Even more, the DEIS used "patterns of bat fatalities observed at existing wind energy facilities … as the basis for determining the likelihood for collision," but those other facilities pale in comparison to the proposed size of the Lava Ridge project.83 The DEIS exposes its inadequacies further by stating that "[b]ecause wind energy facilities in the far western and southwestern United States, which constitute much of the analysis area, are underrepresented in the [utilized databases], there is uncertainty in the predicted fatality estimates and the consequences to bat populations."84 The flaws could not be more clear in the DEIS' attempts to analyze bat populations in and around the proposed project area (which is still largely unknown). Predicting bat mortality at wind facilities is notoriously uncertain, which is compounded in this case given the project's unprecedented magnitude and lack of specific locations for the turbines. As the agency states, "bats may cross the siting corridors multiple times each night when travelling between roost sites and foraging areas." 85 With the size of the proposed project, that means the potential for bat fatalities has been grossly underestimated and was based on improper baseline analysis not taking into account the unpredictable nature of this project. Even if preconstruction surveys indicate a certain level of bat presence and fatality rates, that may change after the facility is built.86 Further, the DEIS predicts, on the low-end for the life of the project, that 36,300–52,380 bats will die, and on the high-end, 266,400–464,880 bats will die; however, the agency does not even attempt to explain why this level of mortality is non-significant to bat populations at the regional or local levels.87 Shockingly, even those numbers are not an accurate prediction of the potential fatalities, as the DEIS goes even further by stating, "Alternative B [and necessarily, all other Alternatives,] could result in a higher bat fatality rate than would be expected based on generation capacity alone." The DEIS recognizes the need for additional surveying and analysis but proceeds in its biased advocation for moving forward with the project, nonetheless. Specifically, the agency states, "[a]lthough these results support the conclusion that the bat fatality rate increases with the number and size of turbines (and thus, the facility's generation capacity), they also reveal substantial geographic and temporal variation in fatality rates."89 It further states, "[t]his introduces uncertainty when attempting to quantitatively assess the project's potential bat fatality rate[,]" and "[d]ata are also lacking on how fatality rates at existing wind facilities change over time, and it is unknown whether initially high fatality rates may decline over time as bats adjust their behavior in response to the presence of the wind energy facility, as habitat is degraded or lost, or as the size of bat populations decline." 90 Thus, it is apparent there has been inadequate consideration of the irreparable impact on bat fatality.	See EIS Section 3.3.1 (Bat Populations and Roosting Habitat) for a description of the analysis assumptions for analyzing impacts to bat populations and roosting habitat, which states that "Fatality estimates for the project are based on the fatality rates observed at other wind facilities in the EPA North American Deserts Level I Ecoregion, and the fatality rate for the project would fall within the range observed at other wind energy facilities in this region. Fatality rates are not intended to be precise predictions but are presented to allow for a meaningful comparison between the alternatives. Although the project acoustic monitoring surveys (WEST 2021a, 2022a) help inform which species occur in and near the siting corridors and the timing of peak bat activity, preconstruction acoustic activity does not appear to be correlated with observed bat fatality rates following construction (Arnett et al. 2015; Solick et al. 2020). The risk of fatalities from turbine collisions also varies among species due to factors such as flight characteristics, foraging behavior, and habitat use (AWWI 2018). Thus, the species composition of fatalities observed at other United States wind facilities was considered when determining the magnitude of the effect on each species' population." EIS Section 3.3.1.1.2 (Bat Populations, Affected Environment) provides additional discussion of the factors influencing bat fatality rates at wind energy facilities and individually assess the risk that turbine collisions pose to each species of bat that may occur in the siting corridors; further details are provided in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). 40 CFR 1502.21 requires the BLM to disclose where there is incomplete or unavailable information when evaluating reasonably foreseeable significant adverse impacts; therefore, the EIS must describe the uncertainties involved in estimating bat fatality rates due the incomplete nature of the publicly available information on the response of bat populations to wind energy development. As previously stated, the fatality rates presented in the EIS are not intended to be precise predictions but are presented to allow for a meaningful comparison between alternatives. Precise estimates of bat fatality estimates are not essential to a reasoned choice among alternatives because there are currently no widely accepted estimates of bat population sizes or populations trends for most species that could be used to assess the potential effects to a population from specific fatality rates. While the comment provides no suggestion as to how the fatality estimates in the EIS could be improved, there are currently no widely accepted methods of estimating bat fatality rates from preconstruction data alone, so any other method of estimating fatalities would be no less speculative than the method employed in this EIS. Subsequent to the publication of the draft EIS, the BLM requested additional data from IDFG on postconstruction bat fatality monitoring studies at existing wind energy facilities in Idaho; the bat fatality rates observed at these facilities are consistent with the bat fatality estimates presented in the EIS and additional discussion has been added in EIS Section 3.3.1.2. (Bat Populations and Roosting Habitat, Impacts). The EIS makes no argument that the estimated bat fatality rates would not have significant impacts on bat populations; instead, Section 3.3.1.2 states that hoary bat and silver-haired are expected to account for the majority of these fatalities, and that this level of mortality could have substantial effects on their populations that warrant the implementation of mitigation measures to minimize or avoid these impacts. The EIS also discloses the potential for significant impacts to populations of bats that may experience future declines from WNS as it continues to spread in the western U.S., despite the lack of evidence that those species experience large number of fatalities from collisions with wind turbines. Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed, and additional monitoring would be conducted to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), this approach is consistent with the *U.S. Fish and Wildlife Service Land-based Wind Energy Guidelines* (USFWS 2012).
11535-27	Steven Andersen	Today we know that fatality rates of bats can outnumber those of birds at most wind energy facilities.91 During operation, habitat loss or deterrence due to ultrasonic sounds might occur.92 Nevertheless, effects resulting from direct or indirect contact with moving turbine blades are the subject of main concern, causing lethal or sub-lethal injuries.93 There are proximate causes of bat fatality, implying direct collision and barotrauma.94 Collision can be explained by ultimate causes, comprising why bats approach moving turbine blades, including either random collision (presence of bats), coincidental collision (e.g., flight behavior), or collision as a result of attraction.95 Bats with visual injuries found dead or injured underneath turbines have been associated with physical contact with moving turbine blades, which is made more true by the fact that even by using echolocation, the rapidly moving turbine blades are still hard to detect in time and thus to avoid.96 Furthermore, bats being hit by moving blades continue flying in an altered direction, which means there are an unknown number of offsite deaths due to such sub-lethal injuries, leading to even higher fatality rates.97 The DEIS drastically underestimates and underappreciates these impacts by not surveying sufficient area in and around the proposed siting corridor, and by failing to consider the effect a project of	See response to comment 11535-26 (in Table A-3b, Bats) for a discussion of the analysis assumptions in the EIS; as described in this response, more precise estimates of bat fatality rates are not essential to a reasoned choice among alternatives, partly due to the lack of reliable estimates of bat population sizes and trends, but primarily because it is widely accepted that wind energy poses significant risks to some bat species, as disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitats). As described in Section EIS 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), there is little evidence to suggest that barotrauma is an important source of mortality at wind energy facilities. Increased understanding of the causes of bat mortality at wind turbines may help improve mitigation strategies in the future, but regardless of the specific causes of mortality or the overall estimated fatality rate for each alternative, the relative impact of each alternative would still be directly correlated to the number of turbines installed. Therefore, additional discussion of the sources of bat mortality at wind energy facilities is not essential to a reasoned choice among alternatives. Impacts to bat roosting habitat are also analyzed in EIS Section 3.3.1; additional analysis is provided in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). The background literature review conducted

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		this size will have on bat fatality rates based on the foregoing threats. The projected fatality rates for the project are based on unsupported baseline reports which rely on wholly unpredictable information. Again, the DEIS admits that "there is uncertainty in the predicted fatality estimates and the consequences to bat populations" of the project.98 Fatality rates in the DEIS were "calculated by applying the mean bat fatality for the EPA North American Deserts Level I Ecoregion of 1.5 bat fatalities per MW per year (WEST 2021c) to the estimated range of generation capacity under each alternative."99 These estimates grossly misrepresent the potential impact this project will have on bat populations because bat fatalities are the result of various causes, not just direct collision.100 Specifically, in some studies of fatalities, not all carcasses showed external injuries.101 Necropsy and histopathology results revealed internal injuries, indicating barotrauma.102 Barotrauma, which is caused by a sudden decrease in air pressure resulting in severe hemorrhaging, might cause up to 90% of fatalities.103 Even more, bone fractures, as a result of direct collision, might often remain undiscovered by visual inspection alone.104 The agency falls well short in its obligation to take a hard look at the potential fatality rates of bat population, as the Lava Ridge project would represent a new and additive source of fatality.	for the EIS provided no information to suggest that wind energy facilities generate ultrasonic sound that deters bat activity; such a conclusion would be contrary to the evidence of substantial bat fatalities from collisions with turbines. Instead, acoustic deterrent devices are being investigated as a means of reducing bat fatalities and are included as a potential adaptive management measure (applicant-committed measure 157).
11535-28	Steven Andersen	Further, the DEIS takes a national-view approach in its consideration (inadequate) of proposed impacts to bat population, taking the analysis out of local assessment, i.e., no loca focus. Importantly, inter alia, it provides only a cursory review of the Townsend's Big-eared bat (corynorhinus townsendii), seemingly disregarding this important bat altogether, failing to appreciate that the proposed actions could extirpate an important part of the population of the Townsend on the Snake Plane. The DEIS does not even cite to the Species Conservation Assessment and Conservation Strategy for the Townsend's Big-Eared Bat, which is a comprehensive summary of the status and conservation needs for Townsend's big-eared bats in the West, and specifically, in Idaho. 106 Further, there was not cooperation with local bat experts identified in the DEIS. Not only does this show the failure of the agency to consider local impact generally, it is also concerning given that the foregoing assessment discusses in detail issues such as foraging, which the DEIS failed to evaluate. Thus, the DEIS analysis of the impact to local bat population is grossly insufficient. With reference to the lack of consideration of local impact generally, and the serious impacts of the proposed project on species such as the Townsend's big-eared bat, we support and adopt the comments to those points submitted by Brenda R. Pace, Master-Naturalist.	As described in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations), wind energy development primarily threatens bat species that engage in long distance migrations and do not inhabit the siting corridors year-round. Therefore, a larger analysis area is needed to properly assess the potential cumulative impacts to bat populations from the expansion of wind energy across their ranges. This section also discloses the lack of detailed demographic data on bat populations, particularly at the local scale, and the reasons this data is difficult to obtain. Development of the EIS included a robust public involvement process, including the solicitation of comments and additional information for consideration in the EIS. The BLM also solicited input from IDFG, USFWS, NREL, NPS, and other relevant agencies during the development of the analysis in the EIS. As described in Table App3-2 in EIS Appendix 3 (Issues Analyzed in Brief), the Townsend's big-eared bat was dismissed from detailed analysis in the EIS because it has never been recorded as a fatality at a wind energy facility.
11557-3	Deanna Weigel, Andy Weigel	several other proposed mitigation measures have no proven efficacy and/or rely on technology and methods that do not even exist currently. Examples include: [...] Avian and Bat Species: no demonstrated replacement habitats nearby for bats, no actual remedy for white-noise syndrome, and insufficient plans for conservation strategy.	See EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) for a description of mitigation measures that would be implemented to minimize or avoid impacts to bat populations and an evaluation of the effectiveness of these mitigation measures; the conservation strategy for bats is described in the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation). Habitat for bats is generally lacking in the siting corridors and the effects of wind energy development on bats are primarily associated with turbine collisions that occur during fall migration rather than with impacts to bat habitat. Therefore, mitigation measures that create or restore habitat for bats are unlikely to reduce the impacts to bats associated with the action alternatives; however, improvement of riparian habitat for foraging bats is a type of mitigation action that would be considered (see Mitigation Framework for Birds and Bats in EIS Appendix 4). WNS has the potential to impact some of the same bat species that may experience fatalities from collisions with turbines, but otherwise has no relation to the implementation of the action alternatives (see Table App3-1 in EIS Appendix 3 [Issues Analyzed in Brief]). As described in EIS Section 3.3.1.1.3 (Bat Populations and Roosting Habitat, Existing and Future Trends and Actions), the fungus that causes WNS has recently been detected in southeastern Idaho, but there are no confirmed cases of WNS in Idaho. Given these factors, any mitigation measures targeted at reducing impacts of WNS would be unlikely to reduce the impacts to bats associated with the action alternatives; however, contributing funds to assist with research on WNS and vaccination against WNS are types of mitigation actions that would considered (see Mitigation Framework for Birds and Bats in EIS Appendix 4).
11598-19	Idaho Conservation League	Bats A wide variation in fatality rates at wind facilities are observed across N. America.16 A total of seven bat species inhabit the project area, split between tree bats and cave-hibernating bats. Both groups are likely affected by the project, for differing reasons. Tree bats, including the hoary and silver-haired would likely be attracted to project infrastructure and both are expected 16 American Wind Wildlife Institute (AWWI). 2018. AWWI Technical Report: A Summary of Bat Fatality Data in a Nationwide Database. Washington, DC. to suffer similar impacts. The hoary bat is also an ESA candidate and Idaho SGCN species due to rapid population declines and a slow growth rate. The big brown bat is a BLM special-status species for the SFO. The cave-dwelling little brown bat is also an ESA candidate and Idaho SGCN species due in part to North American populations being affected by White Nose Syndrome. Of note, Townsend's big-eared bats were omitted from an impact analysis in the DEIS. Diseased bats could be even more susceptible to population-level effects if turbines prove a significant cause of mortality in the project area. Direct and delayed mortality due to wind power facilities can be significant,17 as could stressor-induced mortality caused by disease. While a species-specific mortality and impact analysis would be desirable, these combined factors could relate to all bat species documented in the project area. Also important is that the DEIS cited documentation suggesting that bats may travel back and forth through project siting corridors several times per night. Blade speed is a significant variable in bat mortality associated with wind generation facilities. Current behavioral data also indicates that periods of seasonal and day-period movement of migratory bats have been identified in recent research. Distinct activity during fall migration season was also apparent in acoustic monitoring surveys of the area. Curtailment, based in part on this migration analysis, can reduce bat mortality by over 60%.18 ICL recommends using known and emerging research on efficacy of curtailment technologies to minimize those impacts. Effective practices should be implemented from the start of project operations. Additionally, the DEIS indicates that bat use in the project area and surrounding areas is largely unknown, but proposes no additional work to discover more about local bat populations and behavior. Nevertheless, five species known to be using the area were determined to have a moderate or high potential for population-level impacts. The Snake River plain encompasses very important bat habitat, including for	As described in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations), the potential for some bat species to experience large population declines due to the continued spread of WNS was considered when determining which species may experience population-level impacts from collisions with operational turbines under the action alternatives. The Townsend's big-eared bat is analyzed in Table App3-2 in EIS Appendix 3 (Issues Analyzed in Brief). Cumulative effects from other planned projects in the analysis area are discussed in EIS Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts). Proactive mitigation measures such as feathering turbine blades when wind speeds are below the cut-in speed for the turbine (applicant-committed measure 160). Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality; adaptive management measures would be implemented as needed if high fatality rates are observed, and additional monitoring would be conducted to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), this approach is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). Detailed studies of migratory routes in the analysis area are beyond the scope of the EIS but are included as potential adaptive management or compensatory mitigation for avian and bat species; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details.

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		hibernacula, north-south fall migration routes and maternity colonies. In addition to echo-location, bats also use visual cues to migrate and fly at low speeds, indicating a complex relationship to large physical structures on the landscape. Given that several more wind power-generation facilities are planned in the Snake River plain, ICL believes that the BLM should encourage more study work on bats in south-Central Idaho to assess: migration and other seasonally-driven behavior variables, food availability, weather 17 Steven M. Grodsky, Melissa J. Behr, Andrew Gendler, David Drake, Byron D. Dieterle, Robert J. Rudd, Nicole L. Walrath, Investigating the causes of death for wind turbine-associated bat fatalities, Journal of Mammalogy, Volume 92, Issue 5, 14 October 2011, Pages 917–925, https://doi.org/10.1644/10-MAMM-A-404.1 18 Adams EM, Gulka J, Williams KA (2021) A review of the effectiveness of operational curtailment for reducing bat fatalities at terrestrial wind farms in North America. PLoS ONE 16(11): e0256382. effects (Baerwald and Barclay 2011)19 and cumulative effects from wind power expansion in the area. Macro and micro-citing should be based on an accumulation of knowledge of the interplay between these factors. 19 Baerwald EF, Barclay RMR (2011) Patterns of activity and fatality of migratory bats at a wind energy facility in Alberta, Canada. J Wildl Manag 75(5):1103–1114. doi:10.1002/jwmg.147	
11598-29	Idaho Conservation League	Typos and corrections The DEIS contains the following typo: In Idaho, data are available for a single facility (Horse Butte Wind), which reported bat fatality rates of 7.80, 9.27, and 5.12 bat fatalities per MW per year across 3 years of study (WEST 2021c). The Horse Butte Wind energy facility is approximately 55 miles southwest southeast of the siting corridors in similar sagebrush steppe habitat but	This sentence ends with “but includes forested and riparian habitats that are lacking in the siting corridor.” No revisions are necessary.
11598-33	Idaho Conservation League	White-nose fungus White-nose fungus, which has had devastating impacts on bat populations, was recently seen in Idaho. The DEIS should factor white-nose fungus into the cumulative effects analysis and identify what strategies might be employed to avoid, minimize and mitigate impacts.	The potential for WNS to lead to future declines of cave-hibernating bat populations in the analysis area is disclosed in EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment). Although the big brown bat, little brown bat, and western small-footed bat have a low likelihood of colliding with operational turbines, these species were analyzed in detail in the EIS (see Section 3.3.1.1.2 [Bat Populations]) because of their potential to be heavily impacted by WNS in the future. Additional discussion is provided in EIS Section 3.3.1.1.3 (Bat Populations and Roosting Habitat, Existing and Future Trend and Actions) and EIS Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts).
11753-3	Mary Rios	Bats are very important to our ecosystem, which include our farms, since we are an agricultural state. The EIS statement claims that bats may be in danger due to the turbines, I think they need to change the word may to will. Here are several sentences that are stated on page 107 of the EIS statement-”Species with small, declining populations may be vulnerable to small increases in mortality as a result of collisions with turbines. Species with larger, more stable populations may also be vulnerable to population declines if very high fatality rates from turbine collisions are sustained over a long time period. Each of the bat species with the potential to occur in the siting corridors (see Table 3.3-1) was evaluated for its likelihood of colliding with turbines and the potential for those fatalities to lead to population-level effects (see Table App3-2 in EIS Appendix 3). Twelve of these species were determined to have a low likelihood of population-level effects. Though effects to these 12 species may occur (as analyzed and described in Table App3-2 in EIS Appendix 3),experience a readily detectable population decline in the analysis area.” This research was based on other wind farms. But those wind farms’ turbines were not as large as the wind turbines that will be put in, in the Magic Valley. My students and I did a lot of research on bats and how many insects they eat in one night. On most websites, it stated that a single bat can eat anywhere from 3,000 to 4,500 insects in one night. It will not be a good thing for our farmers in our state, if the bats’ populations are affected by this huge wind project. This project would definitely have a negative effect on their populations. On page 110 of the EIS statement it states: “Post Construction monitoring at existing U.S. wind facilities indicates that migratory tree bats account for most (72%) of the bat fatalities from collisions with turbines (AWWI 2018; Peters et al. 2020). The migratory behavior of these species (e.g., flight paths, flight height, migratory stopover habitat) are not well understood, which makes it difficult to determine the specific attributes that lead to the increased collision risk for these species (Hein and Schirmacher 2016; Peters et al. 2020). However, in general, it is expected that collision risk during migration to and from breeding grounds is higher for migratory tree bats because they must fly more frequently and over greater distances than cave-hibernating bats.” On page 111, it states- “Both the hoary bat and the silver-haired bat are BLM special-status species for the SFO and are Idaho Tier II SGCNs (see Table 3.3-1), which indicates management intervention will likely be necessary to prevent long-term declines in these species and to prevent a trend toward federal listing under the ESA.” So this means that the tax payers would have to pay for this intervention that will be needed by these bat populations so that they will not go extinct due to the wind turbines. This is an expense that we should not have to pay for. So for the bats’ populations in Idaho, the no build option is the only way to go. The BLM needs to vote for option A.	EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations and Roosting Habitats) describes bat species that have a moderate to high risk of experiencing population-level impacts from collisions with turbines; EIS Section 3.3.1.2.2 describes the mitigation measures that would be implemented to minimize or avoid impacts to bats. MVE would bear the cost of implementing all mitigation measures. While it is possible that insect populations could increase locally if predation by bats is reduced, operational turbines can also kill large numbers of insects. See EIS Section 3.11.1.2 (Pollinators, Impacts). However, it is not possible to further quantify the potential magnitude of this impact or the consequences to local agriculture due the lack of studies on this subject (Voigt 2021). Voigt, C.C. 2021. Insect fatalities at wind turbines as biodiversity sinks. *Conservation Science and Practice.* Available at: https://www.researchgate.net/publication/348790564_Insect_fatalities_at_wind_turbines_as_biodiversity_sinks. Accessed December 29, 2023.
11869-22	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	Beyond wild game, the Project will devastate many other vulnerable animal populations in Idaho. The hundreds of sweeping blades slicing through the air, for example, are known to pulverize bat and bird populations.2 Increased mortality from wind farms has even pushed some bat species to the point of extinction.3 These devastating impacts will affect the rest of Idaho’s ecosystem. Bats maintain an equilibrium in the insect population and ensure that insects don’t overwhelm local crop output. And a reduction in the predatory bird population will lead to a corresponding increase in rodents that harm crops. The draft EIS proposes no adequate alternative to harmful effects on Idaho’s wildlife. While the draft EIS generally acknowledges the Project will harm Idaho wildlife, it still suggests preferred proposed alternatives that will cause “irreversible” damage to Idaho wildlife. Importantly, the Idaho Department of Fish and Game designates several bat species as “species of greatest conservation need” (SGCNs).4 The agency knows that the Project will very likely have a “population-level” effect on several of these SGCN bat species, but it disregards those consequences. DEIS 3-37, 3-41–42.	See EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) for the definition of irreversible and irretrievable commitments, which are related to the duration of the impact rather than the severity or magnitude. Special-status avian and bat species, including those designated as SGCNs by IDFG, were individually assessed for their populations to be impacted by wind energy development, as described in EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment) and Section 3.3.2.1 (Avian Populations, Affected Environment). Those species with a moderate to high potential for impacts are analyzed in detail in Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) and Section 3.3.2.2 (Avian Populations, Impacts). Species with a low potential for impacts are analyzed in Table App3-2 and App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Due to the potential for significant impacts to special-status avian bat species, a number of avoidance, minimization, and mitigation measures would be implemented as described in the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation). As described in EIS Section 3.3.1.3 (Bat Populations and Roosting Habitats, Irreversible and Irretrievable Commitments and Short-term Uses Versus Long-Term Productivity) and

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			Section 3.3.2.3 (Avian Populations, Irreversible and Irretrievable Commitments and Short-term Uses Versus Long-Term Productivity), irretrievable impacts to birds and bats would not be considered irreversible because they would be unlikely to result in a trend toward listing under the ESA or a loss of population viability. As described in response to comment 11753-3 (see in Table A-3b, Bats), there have been no studies quantifying the impact of bat fatalities at wind energy facilities on local insect populations, but mortality of these insects would also increase as a result of collisions with operational turbines.
11871-11	WildLands Defense	Recent research shows turbine bat and bird kills are likely drastically under-estimated. Studies used for comparison used flawed methods and did not rely on detection dogs and/ir frequent enough surveys. The SEIS states: The project's highest estimated bat fatality fate from collisions with turbines is: 1,800–3,141 (mean), 8,880–15,496 (maximum) bats per year. This may lead to population-level effects for some species of migratory tree bats and cave-hibernating bats whose populations are reduced by white nose syndrome. We stress that mortality is highly likely to be orders of magnitude greater – given flaws in many of the studies (including those of WEST and other industry consultants who deliver products massaged and wordsmithed to please industry). There is credible evidence that many of the past volant species mortality studies were done on the basis of survey methodologies that greatly under-estimated mortalities. In scientific retrospect, many studies were not done using search dogs and were not conducted frequently enough to provide an adequate representation.	Multiple sources of bat fatality estimates were considered in the EIS. Postconstruction bat fatality monitoring studies include adjustments for searcher efficiency and search interval. The TAC will determine the appropriate carcass search methods for postconstruction avian and bat fatality monitoring for the project based on the best available scientific literature and data. EIS Appendix 4 (Mitigation) has also been revised to include additional details on the TAC and their responsibilities (see additional measure mm), and to include the full Avian and Bat Postconstruction Monitoring Plan, which provides additional details on the bat fatality monitoring protocols.
11871-37	WildLands Defense	The presence of irrigated pastures in association with Spring Valley Wind in Nevada provided a critical resource for bats in migration. Is the same effect happening here? DEIS at 3-36 states: "During the second year of project acoustic monitoring surveys, much higher bat activity was recorded at the acoustic monitoring stations installed near the irrigation canals in the siting corridors than at monitoring stations installed near cave features (see Figure 3.3-2), confirming that concentrated foraging activity occurs along the canals (WEST 2022a). Data collected from NABat stations during the second year of acoustic monitoring surveys revealed that bat use and species diversity were higher at stations near rock features (which are likely to be used for roosting) and near stock ponds than at stations where these features were absent (WEST 2022a)". The DEIS the tries to discount the information – claiming lower bats in this area of the SRP from summer monitoring. But these areas may be crucial during migration – as was the case with Spring Valley wind.	As described in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations), "Characterizing the abundance of individual bat species in the siting corridors is not possible with acoustic monitoring data alone because individual bats may be recorded passing the same detector multiple times. Due to the general lack of detailed long-term studies on bats, it is also difficult to determine how bat abundance and use in the siting corridors compare to other locations within the analysis area. However, the recent publication of the first results of the North American Bat Monitoring Program have begun to shed some light on spatial variations in bat occupancy (Udell et al. 2022). Results are only available for five of the bat species listed in Table 3.3-2, but summer occupancy maps for all five of these species clearly show that bat occupancy in the Snake River Plain is substantially lower than surrounding areas. This is consistent with the low bat activity observed during summer acoustic monitoring surveys (WEST 2021a, 2022a). Winter abundance maps were not yet available at the time of this draft, and occupancy during migration is not included in the study. The pronounced peak in bat activity during the fall migratory season recorded during project acoustic monitoring surveys indicates that bats have the potential to pass through the siting corridors in large numbers, even if little bat use is occurring during the summer and winter (when bats would be hibernating)." Additional information on bat foraging and migration in the siting corridors is provided in EIS Section 3.3.1.1.2 and AIB-8 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). New measures to protect ephemeral surface waters that may be used foraging bats have been added to the final EIS (see additional project-specific measure bb).
11871-44	WildLands Defense	There are extensive flaws in use of any comparative data such as this. See for example: https://www.mdpi.com/1424-2818/12/3/98 "Abstract: Wind turbine collision fatalities of bats have likely increased with the rapid expansion of installed wind energy capacity in the USA since the last national-level fatality estimates were generated in 2012. An assumed linear increase of fatalities with installed capacity would expand my estimate of bat fatalities across the USA from 0.89 million in 2012 to 1.11 million in 2014 and to 1.72 million in 2019. However, this assumed linear relationship could have been invalidated by shifts in turbine size, tower height, fatality search interval during monitoring, and regional variation in bat fatalities. I tested for effects of these factors in fatality monitoring reports through 2014. I found no significant relationship between bat fatality rates and wind turbine size. Bat fatality rates increased with increasing tower height, but this increase mirrored the increase in fatality rates with shortened fatality search intervals that accompanied the increase in tower heights. Regional weighting of mean project-level bat fatalities increased the national-level estimate 17% to 1.3 (95% CI: 0.15–3.0) million. After I restricted the estimate's basis to project-level fatality rates that were estimated from fatality search intervals <10 days, my estimate increased by another 71% to 2.22 (95% CI: 1.77–2.72) million bat fatalities in the USA's lower 48 states in 2014. Project-level fatality estimates based on search intervals <10 days were, on average, eight times higher than estimates based on longer search intervals. Shorter search intervals detected more small-bodied species, which contributed to a larger all-bat fatality estimate. "Fatality estimation can also be more accurate by using scent-detection dogs in place of human searchers. Where dogs were used at the same turbines concurrently searched by humans, and monitoring methods were otherwise the same, 71 bat fatalities were found, where humans found one . At another project previously monitored for three years by humans, fatality finds using dogs resulted in a bat fatality estimate that was 11 times higher than the estimate based on human searchers, despite the search interval and maximum search radius being equal [114]. Dogs can find trace evidence of bats that human searchers would unlikely find, and likewise they can find bats hidden in tall vegetation recent use of scent-detection dogs suggests that searcher detection rates likely biased fatality estimates to be low through 2014. Whereas fatality estimators are often compared for their accuracy [111 , 115 ,116], accuracy in fatality estimation is most substantially affected by the field methods used to inform the terms of the estimators. Accuracy in fatality estimation depends on detecting as many of the fatalities as possible and accurately adjusting the fatality count for the proportion undetected. Finding more of the fatalities diminishes the necessary adjustments along with the adjustments' error and biases. Accuracy in 'all bat' fatality estimation depends on detecting all of the species represented by fatalities. Unless the monitor is aware of which species could have been found but were not found, there is no suitable adjustment for increasing the accuracy of negative findings of a species". We are greatly concerned that the consultant knows who butters its bread, and uses questionable, out-dated and industry-slanted methodologies and mortality comparisons in its avian and bat studies and reports	The estimated bat fatality rates and analysis of impacts to bat populations presented in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) are based on the best publicly available literature and data. Additional details on bat fatality rates at existing wind energy facilities in Idaho have been added to this section. As stated in the analysis assumptions in Section 3.3.1 (Bat Populations and Roosting Habitat), fatality rates are not intended to be precise predictions but are presented to allow for a meaningful comparison between the alternatives. Precise estimates of bat fatality rates are not essential to a reasoned choice among alternatives because there are currently no widely accepted estimates of bat population sizes or populations trends for most species that could be used to assess the potential effects to a population from specific fatality rates. Despite the lack of this information and the uncertainty in the magnitude of the impact of wind energy development on bat populations, the EIS concludes that, without mitigation, the action alternatives have the potential to result in significant impacts to several species of bats including migratory tree bats, which are known to collide with operational wind turbines in large numbers as well as several species of cave-hibernating bats that do not collide with operational turbines frequently but that may be susceptible to small increases in mortality if their populations decline due to WNS in the future. Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality rate. The TAC will determine the appropriate carcass search methods for postconstruction avian and bat fatality monitoring for the project based on the best available scientific literature and data. Adaptive management measures would be implemented as needed if high fatality rates are observed, and additional monitoring would be conducted to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), this approach is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).

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		associated with this EIS. The Lava Ridge project very likely greatly underestimates mortality – based on flawed and out-dated mortality detection estimates at other facilities.	
11871-45	WildLands Defense	WEST states: "The assessment of potential impacts to avian and bat species at the Project was informed by the Tier 1–3 studies conducted for the Project along with the most up-to-date publicly available information on impacts to wildlife from wind energy" This is not the case, as many recent studies highlighting harms caused by wind, are not included, and the EIS constantly minimizes environemntla concerns. Further, LS Power has not revealed the specifics of the turbine type to be used, and specific siting sufficiently. West at 6: "The AWWI has compiled publicly available data from 193 studies across 130 WEFs in the US and reported 281 species of birds as fatalities during surveys and an additional 13 species as incidental observations (AWWI 2019). Of the studies between 2002 and 2017, fatality estimates in the US ranged from approximately zero to 12.0 birds/MW/year, with a median value of 1.8 (AWWI 2019). The all bird fatality rate for 28 studies in the USFWS Pacific region appears to be approximately 2.0 birds/MW/year (see Section 2.2.1.3; AWWI 2019)". "Across all spatial scales examined in this report, fatality estimates ranged from zero to 9.15 fatalities/MW/year; median and mean estimates ranged from 2.28–2.66 (median) to 2.50–2.90 (mean) across all spatial scales (Table 2, WEST 2021). Fatality estimates from scales with low sample sizes (e.g., Idaho) should be interpreted with caution". Given the shocking increase in carcass detection when dogs are used to detect dead bats and birds, as detailed in Smallwood 2020, shouldn't all or nearly all of the mortality estimates be viewed as extreme underestimates of mortality??? The DEIS mortality estimates are deeply flawed, and reflect the use of out-dated deficient detection methods. As descried in the Smallwood 2020 article for bats above, similar deficiencies of detection, study design, human deservers vs. scent dogs, frequency of surveys, turbine type, etc. plague WEST's use of a mishmash of old avian wind mortality monitoring efforts. Smallwood 2020 concluded: "Summary, I estimated 2.22 million bat fatalities across the USA in 2014, but with a 95% CI of 1.77 million to 2.72 million bat fatalities. My estimate was made in the face of very substantial biases, potentially shifting the mean lower by a factor of three and higher by up to a factor of 11. The proportion of mortally injured bats leaving the search areas under their own volition, otherwise known as crippling bias [109], could also shift my USA-wide estimate higher [114]. Furthermore, since 2014, the installed capacity of wind energy has increased 52% to 100,025 MW, and bat fatalities likely increased proportionally with this increase in capacity, so long as the pool of vulnerable bats has not diminished. The decline of hoary bats in the Pacific Northwest [126] suggests that the pool of vulnerable bats might be diminishing. It is imperative, therefore, that methods of fatality monitoring improve to more accurately estimate bat fatalities. Future fatality monitoring could vastly improve the accuracy of fatality estimation, by replacing human searchers with scent-detection dogs. It is also imperative that the benefits of wind energy be weighed against the ecological costs [127 ,128]. Improved methods are also imperative for measuring the efficacy of mitigation measures [129], such as operational curtailment strategies [130–133] and deterrents [134]".	See response to comment 11871-44 (in Table A-3b, Bats) for a discussion of the bat fatality estimates presented in the EIS and postconstruction bat fatality monitoring. As also stated in that response, the estimated bat fatality rates and analysis of impacts to bat populations presented in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) are based on the best publicly available literature and data; the WEST baseline resource reports were one of many sources evaluated. The BLM also coordinated with state and federal wildlife agencies to obtain additional data and expert input to help inform the analysis of impacts to bat populations. Subsequent to the publication of the draft EIS, the BLM requested additional data from IDFG on postconstruction bat fatality monitoring studies at existing wind energy facilities in Idaho; the bat fatality rates observed at these facilities are consistent with the bat fatality estimates presented in the EIS. A discussion of the data from the facilities has been added to EIS Section 3.3.1.2.2. Although it is not possible to precisely quantify the impacts to bat populations from mortality caused by collisions with operational wind turbines, the BLM's literature review and expert consultation provided sufficient evidence to conclude that the action alternatives could lead to significant impacts to some bat species (such as migratory tree bats and cave-hibernating bats vulnerable to the continued spread of WNS). Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality rates. The TAC will determine the appropriate carcass search methods for postconstruction avian and bat fatality monitoring for the project based on the best available scientific literature and data. Adaptive management measures would be implemented as needed if high fatality rates are observed, and additional monitoring would be conducted to assess the effectiveness of adaptive management measures. The BBCS (Appendix M in MVE [2023]) provides additional details on the measures MVE would implement to minimize or avoid impacts to bat populations. EIS Appendix 4 (Mitigation) describes additional mitigation measures that BLM would require MVE to implement to further reduce impacts (see Table App4-4). If unresolved impacts to bat populations remain after the implementation of the measures, compensatory mitigation would be required (see Mitigation Framework for Birds and Bats in EIS Appendix 4). Together, the implementation of these mitigation measures will allow the BLM to more accurately assess the fatality rate for individual bat species and provide flexibility so that specific adaptive management measures can be targeted to reduce those fatalities as needed. Additional bat fatality monitoring would then be implemented to assess whether adaptive management has been successful at reducing fatalities or if additional adaptive management or compensatory mitigation measures are needed to address unresolved impacts. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012) and provides the best opportunity to address site-specific impacts while minimizing the impact to the facility's power generation.
11871-57	WildLands Defense	Report Table 6 species refers to tier species – but the info in the table does not seem to mesh with the Table footnote wording.	The tiers in this table correspond to the tiers in the table note as follows: Tier I = Tier 1, Tier II = Tier 2, and Tier III = Tier 3. This table is part of MVE's *Analysis of Avian and Bat Mortalities at Existing Wind Facilities* (WEST 2021c), which is one of many data sources evaluated for the analysis in EIS Section 3.3 (Avian and Bat Species). This section describes the current listing status of each species analyzed in detail in the EIS, the listing status of other special-status avian and bat species with the potential to occur in the siting corridors is provided in Table App3-2 and App3-3 in EIS Appendix 3 (Issues Analyzed in Brief).
11871-58	WildLands Defense	14 bat species have been detected here. The WEST consultant report attempts to minimize significance of area to bats and the number of species found here – claiming - a "moderate" number of species. This is major bat biodiversity for this region, Nearly all of these are BLM sensitive species where BLM is required to manage habitats and populations to prevent the need for ESA listing. Again, unbiased scientific analysis must be provided using new studies and a new EIS process.	See responses to comments 11871-44 (see in Table A-3b, Bats) and 11871-45 (see in Table A-3b, Bats) for a discussion of data sources evaluated in the EIS. As described in those responses, the WEST baseline resource reports were one of many sources evaluated. Table 3.3-2 in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) describes the bat species that have the potential to occur in the analysis area; as shown in this table, 17 bat species may occur in the siting corridors, 11 of which are designated as a BLM special-status species. All 17 bat species were individually assessed for their potential to experience population-level impacts from collisions with operational turbines under the action alternatives; five of these species were determined to be at high risk and are analyzed in detail in Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts). The remaining 12 species were determined to be at low risk and are analyzed in brief in Table App3-2 in EIS Appendix 3 (Issues Analyzed in Brief). The impacts analysis in Section 3.3.1.2 discloses the potential for Alternative B to result in high fatality rates that would not be consistent with the BLM's obligations to manage special-status species. To ensure that the action alternatives do not contribute to a trend toward federal listing or loss of population viability for these species, the BLM has proposed additional mitigation measures that would be required under all action alternatives to further minimize impacts to bats (see response to comment 11871-45 [see in Table A-3b, Bats] for additional details).
11871-66	WildLands Defense	Craters of the Moon National Monument and Preserve that contains the nearest maternity colony of Townsend's big-eared bat. It is simply wrong to make this claim: "Impacts to this species are not expected based on the lack of fatalities in the US and its foraging behavior at low altitudes. The limited number of studies and facilities with publicly available data in Idaho adds uncertainty to the timing and magnitude of fatality predictions for bat species of concern in Idaho".	The conclusion that Townsend's big-eared bats have a low likelihood of colliding with turbines is based on the best available scientific data. As described in Section 3.3.1.2.2, postconstruction monitoring would be implemented to assess bat fatality; adaptive management measures would be implemented as needed if high fatality rates are observed.
11871-67	WildLands Defense	Lava Ridge Bird and Bat Conservation Strategy Is Minimal, and Deficient M-63 is chock full of uncertainty: "Additional on-site studies may be considered to further understand impacts before mitigation options are implemented, such as focused avian surveys, site evaluations of potential attractants (i.e., prey base, perching substrate), more intensive fatality monitoring studies, or other focused studies. Adaptive management options that MVE will consider, depending on the results of the postconstruction mortality monitoring and taking into account economic feasibility, include, but	Bat and avian use in the siting corridors, including migratory patterns, is described in EIS Appendix 9 in Section 3.3.1.1.2 (Bat Populations, Bat Use in the Siting Corridors) and Section 3.3.2.1.1 (Avian Use in the Siting Corridors), respectively. As described in EIS Section 3.3.1.2 (Bat Populations) and Section 3.3.2.2. (Avian Populations, Impacts), preconstruction bat and avian use is not correlated with postconstruction fatality rates; therefore, postconstruction

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		are not limited to, the following: Addition or modification of anti-perching, anti-nesting, or electrocution protection devices on project facilities; Providing physical samples to the U.S. Geological Survey or other agencies interested in analyzing such samples; Providing funding for research or conservation efforts to be implemented for the benefit of impacted species; Installation of bat deterrents at selected turbines (such as those commercially available from NRG Systems, https://www.nrgsystems.com/products/bat-deterrent-systems) based on the most effective options available at the time of implementation; Development of a strategic curtailment program, with operational adjustments as further defined below; and, Any additional mitigation measures which may be required under the adaptive management framework implemented per the Eagle Take Permit conditions from USFWS. An operational curtailment strategy, which would involve feathering turbine blades within wind speed ranges defined based on species of concern, to be implemented during peak migratory periods at locations shown to significantly contribute to fatalities. Peak periods and locations would be identified based on postconstruction fatality monitoring results, acoustic monitoring data, and/or radar studies; The wind developer has WASTED several years inf failing to conduct studies necessary to determine species use and migration patterns. Solid pre-decisional data must be collected, and reliance on a rickety uncertain 'adaptive" plan after the project is built ca not rectify inadequate pre-decisional data and analysis needed to actuslly take a hard look under NEPA at alternatives. There are sophisticated radar and other technologies available. Detailed pre-decisional data on migration and migration paths must be collected and provided to the public in a SEIS.	monitoring would be implemented to assess bat and avian fatality; adaptive management measures will be implemented as needed if high fatality rates are observed.
11871-75	WildLands Defense	Bat Mortality from Collisions and Barotrauma The bat killed by wind turbine blades Bats that fly too close to wind turbines are killed by either direct impact or from major air pressure changes around the spinning rotors. While bats clearly are killed by direct collision with turbine blades, up to 50 percent of the dead bats around wind turbines are found with no visible sign of injury. The cause for this non-collision mortality is believed to be a type of decompression known as barotrauma, resulting from rapid air pressure reduction near moving turbine blades. Barotrauma kills bats near wind turbines by causing severe tissue damage to their lungs, which are large and pliable, thereby overly expanding when exposed to a sudden drop in pressure. By contrast, barotrauma does not affect birds because they have compact, rigid lungs that do not excessively expand.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), "Bat fatalities from barotrauma (due to rapid changes in air pressure near spinning turbine blades) have been documented, but there is little evidence to suggest that this is an important source of mortality at wind energy facilities (AWWI 2016)." The final EIS has been revised to include a discussion of Lawson et al. (2020) and Guest and Hein (2023), which support the conclusion that there is insufficient evidence to support the conclusion that barotrauma is a significant source of bat mortality at wind energy facilities. Guest and Hein (2023) noted that reducing bat interactions with operational wind turbines is the best solution for reducing either cause of mortality (i.e., collision vs. barotrauma).
11871-76	WildLands Defense	Bat Attraction to Wind Turbines Many species of bats appear to be significantly attracted to wind turbines for reasons that are still poorly understood. Possible reasons for high bat mortality: The more plausible hypotheses include the following: 1. Auditory Attraction Bats may be attracted to the audible "swishing" sound produced by wind turbines. Museum collectors seeking bat specimens have used long poles that were swung back and forth to attract bats and then knock them to the ground for collection. It is not known if these bats were attracted to the audible "swishing" sound, the movement of the pole, or both factors. 2. Electromagnetic Field Disorientation Wind turbines produce complex electromagnetic fields, which may cause bats in the general vicinity to become disoriented and continue flying close to the turbines. 3. Insect Attraction As flying insects may be attracted to wind turbines, perhaps due to their prominence in the landscape, white color, lighting sources, or heat emitted from the nacelles, bats would be attracted to concentrations of prey. 4. Heat Attraction Bats may be attracted to the heat produced by the nacelles of wind turbines because they are seeking warm roosting sites. 5. Roost Attraction Wind turbines may attract bats because they are perceived as potential roosting sites. 6. Lek Mating Migratory tree bats may be attracted to wind turbines because they are the highest structures in the landscape along migratory routes, possibly thereby serving as ren-dezvous points for mating. 7. Linear Corridor Wind farms constructed along forested ridge-tops create clearings with linear landscapes that may be attractive to bats. 8. Forest Edge Effect The clearings around wind turbines and access roads located within forested areas create forest edges. At forest edges, insect activity might well be higher, along with the ability of bats to capture the insects in flight. Resident bats as well as migrants making stopovers may be similarly attracted to these areas to feed, thus increasing their expo-sure to turbines and thus mortality from collision or barotrauma. 9. Thermal Inversion Thermal inversions create dense fog in cool valleys, thus concentrating both bats and their insect prey on ridge-tops. https://windmillskill.com/blog/why-bats-are-insanely-attracted-wind-turbines	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), "The potential effect to individual bat species and their populations is expected to vary based on how frequently they occur in the analysis area, their risk of colliding with operational turbines (based on their flight characteristics and the frequency of fatalities observed at other wind energy facilities in the United States), and the current status of their populations (i.e., whether or not the species is vulnerable or declining)." Since the patterns of fatalities observed at existing U.S. wind energy facilities were examined to determine each species' risk of turbine collisions, the fatality estimates provided in the EIS inherently account for variability in risk factors such as potential attraction to turbines. The TAC would recommend the best minimization strategies for the species occurring in the area, which would allow for the implementation of new technologies to reduce bat fatalities as the scientific understanding of factors influencing bat mortality at wind turbines progresses.
11871-87	WildLands Defense	The DEIS tries to discount bat mortality at wind farms claiming: "There are 11,774 existing wind turbines in Canada and the United States within the analysis area for bats with a combined capacity of 8,112 MW (Hoen et al. 2018; Natural Resources Canada 2022)". Why is the EIS relying on a 2018 document in 2023? What are the specific methodologies used at each wind farm considered in these compilations? How many used digs for detection? At what intervals were searches conducted?	The Hoen et al. (2018) database is regularly updated as new wind energy facilities are constructed; as noted in the full reference provided in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the draft EIS used Version 5.2 of the database, which was updated in October 2022. The final EIS has been updated with information from Version 6.0 of the database, which was updated in May 2023. The Hoen et al. (2018) database and Natural Resources Canada (2022) database only provide basic information on the size, location, and operational date of wind turbines installed in the U.S. and Canada, these databases do not provide any information on bat or avian fatalities associated with these turbines. These databases were queried to determine the total installed capacity of existing wind energy facilities in the analysis area to inform the cumulative effects analysis in EIS Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts). See responses to comments 11871-44 and 11871-45 (see both in Table A-3b, Bats) for a discussion data sources evaluated in the analysis of impacts in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). Both the WEST Renew database and AWWI database aggregate postconstruction bat fatality monitoring data from studies conducted at hundreds of existing wind energy facilities across the U.S. Postconstruction bat fatality monitoring studies typically follow well established methods for conducting carcass searches and adjusting the results to account for factors such as searcher efficiency, carcass persistence, and search area, interval, and period. For additional details on study methodology please refer to the *Analysis of Avian and Bat Mortalities at Existing Wind Facilities* (WEST 2021c) and the *2nd Edition: Summary of Bat Fatality Monitoring Data Contained in AWWIC* (Allison and Butryn 2020) in the project record.

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11871-88	WildLands Defense	M-35 states: “Temporally, bat activity was highest during the fall migration period, which coincides with the period when the majority of fatalities have been reported from postconstruction monitoring studies at other wind energy projects in the region (typically August and September; Arnett et al. 2008, Arnett and Baerwald 2013). Fifteen species were identified in 2021 by Kaleidoscope automatic classification, and twelve species were confirmed through qualitative review The report appears to omit showing Anabat detector location sites.	The BBCS (Appendix M in MVE [2023]) briefly summarizes the results of the 2020 and 2021 bat acoustic monitoring surveys (WEST 2021a, 2022a). The location of acoustic monitors deployed for the surveys was redacted from the public version of the BBCS to conceal the location of sensitive biological resources. The locations of acoustic monitoring stations deployed for the project as well as the locations of NABat acoustic monitoring stations from which data were obtained are shown in Figure 3.3-2 in EIS Section 3.3.1 (Bat Populations and Roosting Habitat); the ID names/numbers for some acoustic monitoring stations were not included in this figure to conceal the location of sensitive biological resources. Additional information on acoustic monitoring stations is provided in the WEST bat acoustic monitoring survey reports (WEST 2021a, 2022a) in the project record.
11871-90	WildLands Defense	The Horse Butte facility bat mortalities were considered the highest in the nation. [How was the monitoring done? Who conducted it? Since the facility was smaller, was it more thoroughly monitored? Were the usual suspect industry consultants not involved?	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), Horse Butte was the only facility in Idaho for which data were available at the time the draft EIS was published. The bat fatality rates observed during the postconstruction fatality monitoring studies at Horse Butte (7.80, 9.27, and 5.12 bat fatalities per MW per year across 3 years of study) were the highest reported in the USFWS Pacific Region and the EPA North American Deserts Level I Ecoregion but are well below the bat fatality rates reported for wind energy facilities in the eastern U.S., which are as high as 50 bat fatalities per MW per year. Subsequent to the publication of the draft EIS, the BLM requested additional data from IDFG on postconstruction bat fatality monitoring studies at six other existing wind energy facilities in Idaho; the bat fatality rates observed at these facilities are consistent with the bat fatality estimates presented in the EIS. Additional details on these studies have been added to EIS Section 3.3.1.2.2. One of these studies reported a higher fatality rate than Horse Butte (approximately 15.8 bat fatalities per MW per year), but this study monitored a non-random sample of turbines that were in high quality habitats, with most fatalities occurring at two turbines near a large reservoir with extensive cliff habitat for roosting bats. This supports the conclusion that bat fatality rates can vary widely across a single wind energy facility and that siting turbines to avoid habitat features that concentrate bat activity can substantially decrease bat fatalities at wind energy facilities. See response to comment 11871-87 (see in Table A-3b, Bats) for a description of the study methodologies for data sources evaluated in the analysis of impacts to bat populations.
11871-91	WildLands Defense	The West Report jumps back and forth between using estimates from across the US to using regional information, and lumping the whole US together. Example; “According to the AWWI (2018), the percentage of fatalities from hoary bat (31.0%), eastern red bat (24.0%), silver-haired bat (16.1%), Mexican free-tailed bat (Tadarida brasiliensis; 10.0%), and four additional species (little brown myotis [Myotis lucifugus; 5.1%], big brown bat [Eptesicus fuscus; 5.0%], tri-colored bat [Perimyotis subflavus; 1.7%], and evening bat [Nycticeius humeralis; 1.6%]), collectively account for more than 95% of all recorded bat fatality incidents in the US ...”. Well, isn’t this in significant part because of the number of studies at wind facilities not located in the interior West?	See responses to comments 11871-44 and 11871-45 (see both in Table A-3b, Bats) for a discussion of data sources evaluated in the analysis of impacts in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). As stated in those responses, the WEST baseline resource reports were one of many sources evaluated. See response to comment 11535-26 (in Table A-3b, Bats) for a discussion of uncertainty in fatality estimates; EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B) specifically discloses the uncertainty in fatality estimates resulting from the underrepresentation of existing wind energy facilities in the far western and southwestern U.S. in the available data on bat fatality rates. Despite this deficiency, both migratory tree bats and cave-hibernating bats are present in the eastern U.S. and the patterns of fatalities observed in that region are consistent with the conclusion that the majority of bat fatalities that occur as a result of collisions with operational turbines can be attributed to migratory tree bats. As also described in this section, data on bat fatality rates from WEST’s (2021c) *Analysis of Avian and Bat Mortalities at Existing Wind Facilities* and the *2nd Edition: Summary of Bat Fatality Monitoring Data Contained in AWWIC* (Allison and Butryn 2020) are presented at multiple spatial scales in the EIS to provide context and to identify geographic variation in bat fatality rates at wind energy facilities, which is necessary to assess whether the project has been appropriately sited and determine what mitigation measure may need to be implemented to address bat fatalities from collisions with operational turbines. Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality rates and determine which adaptive management measures need to be implemented if high fatality rates are observed, as well as additional monitoring to assess the effectiveness of adaptive management measures. The BBCS (Appendix M in MVE [2023]) provides additional details on the measures MVE would implement to minimize or avoid impacts to bat populations. EIS Appendix 4 (Mitigation) describes additional mitigation measures that the BLM would require MVE to implement to further reduce impacts (see Table App4-4). Together, the implementation of these mitigation measures will allow the BLM to more accurately assess the fatality rate for individual bat species and provide flexibility so that specific adaptive management measures can be targeted to reduce those fatalities as needed. Additional bat fatality monitoring would then be implemented to assess whether adaptive management has been successful at reducing fatalities or if additional adaptive management or compensatory mitigation measures are needed to address unresolved impacts. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-based Wind Energy Guidelines* (USFWS 2012) and provides the best opportunity to address site-specific impacts while minimizing the impact to the facility’s power generation.
11871-92	WildLands Defense	Horse Butte wind facility reported bat fatality estimates of 7.80, 9.27, and 5.12 bat fatalities/MW/year across three years of study, the highest in the region (SWCA 2015). Cattle grazing, grassland/herbaceous and hay/pasture, as well as sagebrush-steppe habitat are prevalent at both Horse Butte and the Project, although Horse Butte also includes forested habitat and riparian areas, which are extremely limited within the Project. WHAT about the canals that may generate abundant insect food? Again, this appears to be an effort to downplay likely mortality? The Project area has open canal features, which can be functionally similar as foraging and drinking habitat; however, the absence of trees limits roosting sites near these feature WHAT about the Milner-Gooding canal? The info and mapping used here obscures the Milner-Gooding Canal. It ignores bats potentially coming from other areas and feeding over irrigated pasture and crop fields that surround the project – and being killed in overflights of the project area.	See response to comment 11871-90 (in Table A-3b, Bats) for a discussion of bat fatality rates at Horse Butte and other wind energy facilities in the region. EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) discloses the high likelihood that the irrigation canals that transect the siting corridors (including the Milner-Gooding Canal) provide the highest quality and most consistent drinking and foraging resources in the siting corridors and that these water resources are important habitat components for bats. Due to the potential for concentrated bat activity near these canals, MVE has committed to avoiding turbine placement with 1,000 feet of irrigation canals and avoiding wetlands and other waters to the greatest extent practicable (applicant-committed measure 138); additional measures that the BLM would require would further limit development in proximity to wetlands and other waters; additional details are provided in EIS Appendix 4 (Mitigation). New measures to protect ephemeral surface waters that may be used by foraging bats have been added to the final EIS (see additional project-specific measure bb). The alternatives analysis in Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) also describes the potential for bats travelling between roost sites and foraging areas, such as the canals, to encounter turbines during these flights and

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			qualitatively assesses how this may affect the magnitude of impacts for each alternative based on the number of turbine corridors that would be located between known roost sites and the irrigation canals.
11978-11	Magic Valley Energy, LLC	Section 3.3.1 - Bat Analysis In multiple instances within the DEIS bat section, analyses are based on incomplete data, incorrect understanding of referenced materials, and overstatements of risk associated with bat use in the Project area. These flaws in the DEIS analysis lead to an inaccurate, overstated portrayal of the Project's impacts to bats. This section of the comment letter demonstrates these aspects of the DEIS bat analysis and presents MVE's requested changes in the interest of improving the FEIS with an analysis that is more consistent with the current scientific literature and observed bat use at the Project site. 12. MVE Comment: The DEIS estimates bat fatalities for the Project by assuming the fatality range will fall between the EPA North American Deserts Level I Ecoregion's mean and maximum bat fatality estimates for wind projects. The DEIS attempts to support this concept by stating, "higher fatality rates at more recently constructed facilities suggest that the shift toward larger turbines is increasing the risk of collision for bats (Barclay et al. 2007; Hein and Schirmacher 2016), in part because larger turbines operate at lower wind speeds when bats are most active." However, the DEIS citations tend to show that projects with increased bat fatalities occur mainly in eastern states (i.e., West Virginia, Tennessee) and a more recent 2020 Electric Power Research Institute (EPRI) report3 refuted the reports of Barclay et al. and Hein and Schirmacher, showing in a meta-analysis focused on bat fatality rates and turbine size that there were no apparent correlations between hub height, rotor swept area, or capacity and bat fatality levels. The DEIS assumption for estimating bat fatality rates also ignores other important considerations for estimating fatalities: Project area generally lacks foraging opportunities, surface water, and hibernacula sites, which all suggest relatively low bat use and do not support fatality estimates in excess of the mean. Therefore, the assumption reflected in the DEIS that bat fatalities will fall between the mean and maximum estimates appears unsupported. Additionally, the DEIS itself states, "there is uncertainty in the predicted fatality estimates and the consequences to bat populations." Excluding the minimum range of bat fatalities observed at other wind facilities ignores the uncertainty and contradicts this statement because the BLM is otherwise leading the public to believe that fatalities would only fall between the mean and maximum fatality rates. MVE requests that the FEIS analysis include the minimum- to lower-range of bat fatalities from the EPA North American Deserts Level I Ecoregion (estimated to be 0.0 to 0.08 bat fatalities/MW/yr) and support this possibility contextually throughout the bat section. Using the 0.08 predicted bat fatalities/MW/yr for the 6-MW output under Alternative B, an annual fatality rate of up to 168 bat fatalities from turbine collisions would be projected. This amount is 91% fewer predicted fatalities than the mean estimated fatality rate (1,800) given in the DEIS. An example of the minimum fatality rate's inclusion in DEIS Table 3.3-2 is provided below. Table 1. Revised Version of DEIS Table 3.3-2 Showing Minimum Range Bat Fatalities [see table in PDF for easier reading, below waareformatted to capture intent of table better] Alternative B Estimated generation capacity in MW: 1,200–2,094 Estimated bat fatalities per year from turbine collisions: 96 - 168 (minimum); 1,800–3,141 (mean); 8,880–15,496 (maximum) Estimated bat fatalities for project life from turbine collisions: 2,880 - 5,026 (minimum); 54,000–94,230 (mean); 266,400–464,880 (maximum) Alternative C Estimated generation capacity in MW: 1,134–1,554 Estimated bat fatalities per year from turbine collisions: 91 - 125 (minimum); 1,733–2,331 (mean); 8,547–11,500 (maximum) Estimated bat fatalities for project life from turbine collisions: 2,722 - 3,730 (minimum); 51,990–69,930 (mean); 256,410–345,000 (maximum) Alternative D Estimated generation capacity in MW: 840–1,074 Estimated bat fatalities per year from turbine collisions: 68 - 86 (minimum); 1,256–1,611 (mean); 6,194–7,948 (maximum) Estimated bat fatalities for project life from turbine collisions: 2,016 - 2,578 (minimum); 37,680–48,330 (mean); 185,820–238,440 (maximum) Alternative E Estimated generation capacity in MW: 807–1,164 Estimated bat fatalities per year from turbine collisions: 65 - 94 (minimum); 1,210–1,746 (mean); 5,972–8,614 (maximum) Estimated bat fatalities for project life from turbine collisions: 1,937 - 2,794 (minimum); 36,300–52,380 (mean); 179,160–258,420 (maximum)	In addition to the difficulty in determining what would constitute an appropriate minimum estimated fatality rate, this information would not lead to a more informed analysis because the relative impact of each alternative would remain the same. Both the bat and avian population EIS sections clearly state that the estimated fatality rates presented in Tables 3.3-4 and 3.3-12 are not intended to be precise estimates and do not account for the implementation of mitigation measures, footnotes have been added to both tables to reiterate this point.
11978-12	Magic Valley Energy, LLC	Section 3.3.1 - Bat Analysis ... 13. MVE Comment: Additionally, showing the full range (minimum to maximum) of estimated bat fatalities is consistent with applicable precedent in numerous other NEPA analyses. Both avian and bat fatalities for wind energy facilities are typically estimated in terms of fatalities per turbine or (more commonly) fatalities per megawatt (MW). MVE reviewed the avian and bat fatality estimates from the NEPA documents for a dozen wind energy projects rated at 50 MW or higher and found that in every case where fatality rates were listed, avian and bat fatalities were expressed in one of the following three ways: a) Minimum, average, and maximum fatality rates, b) Minimum and maximum fatality rates, or c) Average fatality rate only. Thus, for consistency with well-established BLM precedent and in order to describe the reasonably anticipated impacts of the Project consistent with NEPA procedures, BLM's avian and bat fatality estimates would need to be expressed in terms as described in item a, b, or c above. If the estimated fatality rates are not reported in this manner, then the FEIS should include rationale explaining why it is reasonable not to base the analysis on the entire range of fatalities or the average of that range. For reference, the avian and bat fatality estimates for the other wind energy NEPA analyses reviewed by MVE are provided in Attachment 2 to this comment letter.	See response to comment 11978-11 (in Table A-3b, Bats).
11978-13	Magic Valley Energy, LLC	14. MVE Comment: The DEIS does not account for applicant-committed measures in the calculated bat fatality rates. Importantly, MVE has committed to feathering the turbine blades when wind speeds are below the manufacturer's recommended cut-in speed. This applicant-committed measure will be implemented from the beginning of operations and has been shown to reduce bat fatalities by an average of 42.5% (Good et al., 2022). MVE believes that including this quantifiable benefit of turbine feathering would result in more realistic estimates of bat fatalities. This could be demonstrated in a table similar to DEIS Table 3.3-2, as shown below. Additional applicant-proposed measures that are expected to reduce fatalities but that are not factored into the fatality estimate include minimizing outdoor lighting, avoiding riparian areas if possible, and implementing 1,000 ft. buffers from canals. Additional measures that may reduce fatalities throughout the lifetime of the Project include adaptive management techniques listed in MVE's Bird	See response to comment 11978-11 (in Table A-3b, Bats).

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		and Bat Conservation Strategy (BBCS, POD Appendix M), such as selective curtailment and acoustic bat deterrents, which can provide meaningful benefits (where one research paper reports a 66.9% reduction in bat fatalities4). Table 2. Revised Version of DEIS Table 3.3-2 Incorporating Turbine Blade Feathering Benefits [see table in PDF for easier reading, below slightly reformatted to capture intent of table better] Alternative B Estimated generation capacity in MW: 1,200–2,094 Estimated bat fatalities per year from turbine collisions with 42.5% estimated reduction from turbine feathering: 56 - 97 (minimum); 1,035 - 1,807 (mean); 511 - 8,911 (maximum) Estimated bat fatalities for project life from turbine collisions collisions with 42.5% estimated reduction from turbine feathering: 1,656 - 2,890 (minimum); 3,105 - 54,183 (mean); 153,180 - 267,306 (maximum) Alternative C Estimated generation capacity in MW: 1,134–1,554 Estimated bat fatalities per year from turbine collisions with 42.5% estimated reduction from turbine feathering: 53 - 72 (minimum); 997 - 1,341 (mean); 4,915 - 6,613 (maximum) Estimated bat fatalities for project life from turbine collisions collisions with 42.5% estimated reduction from turbine feathering: 1,566 - 2,145 (minimum); 29,895 - 40,210 (mean); 147,436 - 19,838 (maximum) Alternative D Estimated generation capacity in MW: 840–1,074 Estimated bat fatalities per year from turbine collisions with 42.5% estimated reduction from turbine feathering: 40 - 50 (minimum); 723 - 927 (mean); 3,562 - 4,571 (maximum) Estimated bat fatalities for project life from turbine collisions collisions with 42.5% estimated reduction from turbine feathering: 1,160 - 1,483 (minimum); 21,666 - 27,790 (mean); 106,847 - 137,103 (maximum) Alternative E Estimated generation capacity in MW: 807–1,164 Estimated bat fatalities per year from turbine collisions with 42.5% estimated reduction from turbine feathering: 38 - 55 (minimum); 696 - 1,004 (mean); 3,434 - 4,954 (maximum) Estimated bat fatalities for project life from turbine collisions collisions with 42.5% estimated reduction from turbine feathering: 1,114 - 1,607 (minimum); 20,873 - 30,119 (mean); 103,017 - 148,592 (maximum)	
11978-14	Magic Valley Energy, LLC	15. The DEIS states: "… to comply with 40 CFR 1502.2(b), this EIS has only [a] brief discussion of other than significant issues" and focuses on species with a moderate to high likelihood of population- level effects from the project. The five species (big brown bat, little brown bat, western small- footed bat, hoary bat, and silver-haired bat) that were determined to have a moderate to high potential for population-level effects are described in detail below." a. MVE Comment: Although the DEIS does not provide details establishing what the effects thresholds would be for making a determination regarding population-level effects for the five bat species (big brown bats, little brown bats, western small-footed bats, hoary bats, and silver-haired bats) the current body of scientific literature does not indicate the potential for moderate to high population level effects from the Project as discussed below. The DEIS states that big brown bats and western-small footed bats appear to have stable populations, and also have a low collision rate with wind turbines (since they rarely fly within the rotor swept height of the Project-available turbines). Little brown bats also have a low collision rate with turbines, as only 647 total turbine-related bat fatalities were recorded in the U.S. between 2006 and 20165. Additional curtailment technologies are also beneficial to these species. These technologies can offer up to 94.4% fatality reductions to big brown bat fatalities6 and as much as 91.4% reduction for little brown bats7. Though data on curtailment effectiveness is limited for western small-footed bats, the call frequency range of this species is similar to the little brown bat therefore a similar fatality reduction rate would be expected for acoustic deterrents. While hoary bats and silver-haired bats do have higher collision rates, curtailment methodologies have shown that fatalities for both of these species can be reduced by 81.4% and 90.9%, respectively8. MVE suggests the FEIS reevaluate the impacts to these species based on the information above, which suggests that the Project would not have a moderate to high likelihood of population-level effects.	As described in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations), "even though there are substantial limitations to quantitatively assessing impacts to bat populations, given the sensitivity of bat populations to increased mortality and the large number of fatalities that have been observed at existing wind energy facilities, it is widely accepted that turbine collisions have the potential to cause major declines in the populations of some bat species." This conclusion is supported by multiple lines of evidence presented in the publicly available literature and the BLM's coordination and consultation with state and federal wildlife agencies as well as NREL. Migratory tree bats experience the greatest mortality at existing U.S. wind energy facilities and these species warrant close examination in the EIS and the development of a robust mitigation framework to ensure that the BLM's actions are consistent with its responsibilities to ensure that the selected alternative does not contribute to a trend toward federal listing or loss of population viability for these species. Though it is true that the cave-hibernating bat species analyzed in detail have not been recorded as fatalities in large numbers at existing U.S. wind energy facilities, there is insufficient data to conclude with certainty that these species will continue to experience low fatality rates from collisions with operational turbines as wind energy continues to expand in the western U.S. Many bat species in the west appear to have different migratory patterns and roosting behavior than their populations in the east, which may affect their risk of turbine collisions. For bat species like little brown bat that have already experienced major declines in the eastern U.S., the low number of fatalities observed at existing U.S. wind energy facilities may be due to the predominance of studies at existing wind energy facilities within the portion of their range that has already been severely impacted by WNS in the data sources evaluated for the EIS. However, as also described in EIS Section 3.3.1.1.2, even a small number of fatalities from collisions with operational turbines could have population-level impacts for cave-hibernating bat populations that have already experienced significant population declines from WNS. While WNS has only recently spread to the western U.S. and large population declines have not yet occurred, each bat species with the potential to occur in the siting corridors was individually assessed for its potential experience population-level effects from fatalities caused by collisions with operational turbines. Each species susceptibility to future population declines from the spread of WNS was considered in this assessment as it has a strong influence on future populations sizes and trends, and thus, strongly influences the potential for fatalities from collisions with operational turbines to result in population-level impacts. The BLM's review of the publicly available literature indicated that big brown bat and little brown bat are at a moderate to high risk of impacts from WNS. Less is known about the effects WNS will have on the western small-footed bat because it has only recently been detected in the species, but their similarity to other species that have been severely impacted by WNS indicates that there is a potential for large population declines to occur. The siting corridors are also located in the same region as the largest known hibernacula for the species. Therefore, the potential for significant impacts to these cave-hibernating bat species cannot be ruled out and detailed analysis in the EIS is warranted. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B) the publicly available literature reveals wide variability in the efficacy of mitigation measures for bats and Tier 4 studies would be necessary to estimate the actual bat fatality rate following construction and to evaluate the effectiveness of both preconstruction and postconstruction avoidance and minimization measures. The TAC would be responsible for evaluating the results of the Tier 4 studies and recommending which adaptive management measures need to be implemented if high bat fatality rates are observed (see EIS Appendix 4 [Mitigation] for additional details).
11978-15	Magic Valley Energy, LLC	16. MVE Comment: The DEIS states: "Data are also lacking on how fatality rates at existing wind facilities change over time, and it is unknown whether initially high fatality rates may decline over time as bats adjust their behavior in response to the presence of the wind energy facility, as habitat is degraded or lost, or as the size of bat populations decline." However, arguably all data shows that rates do not remain at the estimated maximum annual fatality rate throughout operation of a wind facility, as shown in the NWCC 20109 report, which shows multi-year postconstruction monitoring results for over 10 facilities. Further, as previously mentioned, adaptive management measures would prevent annual maximum fatality rates.	The BLM is unaware of any publicly available data on long-term fatality rates at existing U.S. wind energy facilities, most, if not all, studies included in National Wind Coordinating Collaborative (2010) and the databases evaluated when estimating potential fatality rates were conducted during the first 3 to 5 years of a facility's operations. Thus, there is insufficient information to determine how fatality rates may change over the proposed 30-year operation phase for the project. The EIS does not assume that fatality rates under any action alternative would initially be at the maximum estimated rates presented in Table 3.3-4 and specifically states that those estimates do not account for the implementation of mitigation measures. As described in the response to comment 11978-11 (in Table A-3b, Bats), a table note has been added to Table 3.3-4 to emphasize this. As described in the response to comment 11978-14 (in

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			Table A-3b, Bats), Tier 4 studies would be necessary to estimate the actual bat fatality rate following construction and to evaluate the effectiveness of both preconstruction and postconstruction avoidance and minimization measures. The TAC would be responsible for evaluating the results of the Tier 4 studies and determining which adaptive management measures need to be implemented if high bat fatality rates are observed (see EIS Appendix 4 [Mitigation] for additional details).
11978-16	Magic Valley Energy, LLC	The DEIS states: “High bat use has been documented at the irrigation canals toward the western limits of the siting corridors and at presumed roosting features toward the far eastern limits of the siting corridors (WEST 2022a), which are separated by a distance of less than 15 miles, suggesting that bats may cross the siting corridors multiple times each night when travelling between roost sites and foraging areas.” It should be noted that there are likely foraging areas outside the analysis area that would not require passes through turbine strings. Of the species mentioned in Section 3.1.2.2 as being affected by the turbines, myotis species, including little brown bat and big brown bat, and silver-haired bats all have foraging distances less than 3.5 kilometers (2.17 miles) from roosts 10. Western-small footed bats have foraging distances of 6 to 24 km (3.7 to 14.9) miles11, and hoary bats have distances of up to 20 km (12.4 miles)12. All of these foraging distances are under the 15-mile route from the canal to the eastern siting corridor. This sentence should be removed from the analysis as it suffers from a faulty premise.	The potential foraging route between roosting features near the eastern siting corridors and the canals in the western siting corridors is just one example that illustrates the increased collision risk bats face when their roost sites are separated from foraging areas by multiple strings of turbines. Regardless of the availability of other foraging resources beyond the siting corridors, both years of acoustic monitoring surveys (WEST 2021a, 2022a) indicated higher bat activity near surface water features in the siting corridors and surrounding vicinity. While activity was highest near the irrigation canals, higher activity was also recorded near stock ponds, which are scattered throughout the siting corridors, and bats with shorter foraging routes may still encounter numerous turbine strings when travelling between these stock ponds and their roost sites. Ephemeral surface water features (i.e., playas and vernal pools) are also present in the siting corridors and may attract bats when inundated. Bat foraging flight distances reported in the publicly available literature are based on a limited number of studies that may have been influenced by site-specific habitat conditions. Bat foraging flight distances would be expected to vary based on the spatial distribution of foraging habitat and roosting features, and given the widely scattered nature of both high-quality foraging habitat and roosting features in the siting corridors and surrounding vicinity, the possibility that bats in this area engage in longer foraging flights than observed elsewhere cannot be ruled out. The proximity of known concentrated foraging areas and bat roosts to the siting corridors indicates that foraging flights are occurring within the siting corridors, even if some species or individuals do not traverse the entire width of the siting corridors during each foraging flight. Thus, the conclusion that alternatives with fewer siting corridors in close proximity to these features would likely result in less bat fatalities holds true.
11978-17	Magic Valley Energy, LLC	The Rotor Swept Height (RSH) in the DEIS is noted as 130 – 790 ft, which seems to be based on specifications of turbines that cannot be used by MVE for this Project. The RSH used in the DEIS should coincide with the RSH outlined in the MVE POD (MVE 2022), which is limited to 180 – 740 ft. This statement should be corrected throughout the FEIS and in the analysis as it could potentially impact the assessment of bat fatalities.	As described in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts), estimated bat fatalities are based on the generation capacity of each alternative rather than the height of individual turbines due to a lack of information on the relationship between fatalities and turbine height. RSH is considered in the analysis of impacts to avian population is EIS Section 3.3.2 (Avian Populations) because information on the heights different bird species fly at is readily available allowing for a more direct assessment of the collision risk posed by turbines with varying RSHs. The RSH of 180 to 740 feet was used for consistency with the RSH’s presented in the year 1 avian use study (WEST 2021a). On February 4, 2022, the BLM submitted an RFI requesting that MVE reconcile the difference between the RSH reported in MVE (2023) and the year 1 avian use study (WEST 2021a) and recalculate the percentage of flights that occurred within the RSH accordingly. At that time, MVE (2023) indicated that the smallest turbines in consideration had an RSH of 130 to 390 feet, whereas the largest turbines in consideration had an RSH of 180 to 740 feet, resulting in a combined RSH of 130 to 740 feet. On February 17, 2022, MVE provided a technical memorandum in response to this RFI that provided updated versions of Table 4 and 7 from the year 1 avian use report with the RSH use adjusted to reflect the turbine specifications in MVE (2023); an RSH of 130 to 395 feet was used for the smallest turbine model and an RSH of 180 to 790 feet was used for the largest model, resulting in a combined RSH of 130 to 790 feet. The technical memorandum explained that 790 feet exceeds the maximum height of a turbine rotor tip presented in MVE (2023) but was conservatively used to be representative of the largest land-based turbine currently available, and because this RSH was also used in the Eagle Conservation Plan (Appendix T in MVE [2023]). Therefore, the RSH evaluated in the EIS is consistent with the information previously provided by MVE.
11978-18	Magic Valley Energy, LLC	The DEIS states: “Data collected from NABat stations during the second year of acoustic monitoring surveys revealed that bat use and species diversity were higher at stations near rock features (which are likely to be used for roosting) and near stock ponds than at stations where these features were absent (WEST 2022a).” The WEST 2022 report does not support this statement. Instead, the report shows that multiple stations were placed at rock features, and higher activity was only recorded at one, the lava crater. Other rock features did not have elevated activity. Therefore, the assumption that bat use and species diversity were higher at stations near rock features is unsupported when looked at collectively. Elsewhere, the DEIS similarly states “[bat] use was slightly higher at the canal stations as compared to the cave stations but was not higher at NABat stations near stock ponds.” Again in the WEST 2022 report, it is noted that use at canal stations was much higher than caves, which had the lowest activity among all stations. This statement should be removed in the FEIS and in the analysis as it could potentially impact the assessment of bat fatalities.	The draft EIS has been revised to state “Data collected from NABat stations during the second year of acoustic monitoring surveys revealed that bat use and species diversity were higher at stations near the lava crater (which is likely to be used for roosting) and near stock ponds than at stations where surface water and prominent rock features were absent (WEST 2022a).” This is consistent with the *Year 2 Bat Acoustic Monitoring Surveys for the Lava Ridge Wind Project,* which states, “These results indicate bats are attracted to prominent flat water and rock features within the project area” (WEST 2022a:iii).
11978-19	Magic Valley Energy, LLC	The DEIS uses a citation from Frick et al. 2010: This reference is used in the DEIS to cite a paper published in 2010 that estimated little brown bat population effects in 2026. While research supported the estimates at the time of publication in 2010, more recent and relevant research shows evidence that little brown bat populations are rebounding in the Eastern U.S., where white nose syndrome (WNS) began13. MVE is requesting that the analysis using Frick’s 2010 prediction, which is no longer supported by recent and relevant science, be updated to suggest populations may be rebounding in previous decline areas and the species seems to have developed resistance to the disease (Langwig et al, 2017).	Langwig et al. (2017) found evidence that the size of some colonies of little brown bats in New York have stabilized at 5% to 30% of their original size but did not conclude that the species was “rebounding” from WNS. Langwig et al. (2017) also did not conclude that the species as whole has developed resistance to the disease, but rather that the intensive selective pressure exerted by the initial population declines has led to the development of disease resistance in some populations, and that other populations of little brown bats could still be driven to extirpation by WNS. Most importantly, the study could not determine whether the resistance developed in the colonies that persisted is a heritable trait that could be passed on to future generations of bats. Even if the trait were heritable, it would be decades before the species could reach its pre-WNS abundance due to their low reproductive rate. Grimaudo et al. (2021) found evidence that WNS-resistance in little brown bats may be heritable to some degree, but also found that the temperature and humidity of hibernacula had a strong influence on disease severity. The authors concluded that “we should not expect to see all little brown bat populations across North America stabilise [sic] or rebound from declines, but rather the persistence of colonies with the correct combination of host traits and environmental

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			conditions" (Grimaudo et al. 2021). Therefore, it is still reasonable to conclude that there is a risk that little brown bat populations in the analysis area could experience significant declines as a result of WNS during the analysis timeframe. Grimaudo, A.T., J.R. Hoyt, S.A. Yamada, C.J. Herzog, A.B. Bennett, and K.E. Langwig. 2021. Host traits and environment interact to determine persistence of bat populations impacted by white-nose syndrome. *Ecology Letters* 2022(25):483–497. Langwig, K., J.R. Hoyt. K. L. Parise, W.F. Frick, J.T. Foster, and A. Marm Kilpatrick. 2017. Resistance in persisting bat populations after white-nose syndrome invasion. Philosophical Transactions of the Royal Society B 272(1712). Available at: https://royalsocietypublishing.org/doi/10.1098/rstb.2016.0044. Accessed December 29, 2023.
11978-111	Magic Valley Energy, LLC	13. Section 3.3.1.1.2 Bat Populations, Table 3.3-1 Mexican free-tailed bat listed in the table From WEST 2020: The only species that does not have potential to occur in the Project is the Mexican free-tailed bat (Tadarida brasiliensis), as its occurrence is considered accidental or non- regular transient, with no public records within or near the Project counties (IDFG 2021). MVE requests that this bat be removed from analysis.	As described in Table App3-2 in EIS Appendix 3 (Issues Analyzed in Brief), the siting corridors are at the northern limits of the Mexican free-tailed bat's range, but there are records of the species from Idaho, including the Little Wood River Valley 22 miles west of the siting corridors. Therefore, while the species has a low potential to occur in the siting corridors, it is possible that the species may occur in the siting corridors occasionally and it would be inappropriate not to address the potential effects to this species.
11978-112	Magic Valley Energy, LLC	14. Section 3.03.1.1.2 Bat Populations "MVE would also implement curtailment measures to reduce bat fatalities by reducing turbine operations that pose the greatest threat to bat species (applicant- committed measure 158; see Table App4-2 in EIS Appendix 4)." Curtailment is taken into consideration if the need to further reduce fatalities exists based on post- construction monitoring. MVE requests changing the existing language to align with the POD: "If needed to further reduce fatalities based on the results of postconstruction monitoring, MVE would also implement curtailment measures to reduce bat fatalities by reducing turbine operations that pose the greatest threat to bat species (applicant-committed measure 158; see Table App4-2 in DEIS Appendix 4)."	This section has been revised to clarify that feathering turbine blades below the manufacturer's cut-in speed would be implemented throughout operations, and that curtailment (i.e., feathering above the manufacturer's cut-in speed) would not be required unless the TAC determines it is warranted as an adaptive management measure.
11978-113	Magic Valley Energy, LLC	15. Section 3.03.1.1.2 Bat Populations - Hoary Bats "This is likely due to improvements in the ability to differentiate Myotis calls to the species level during the second year (WEST 2022a), and the species likely accounts for most of the activity recorded during summer in the first year of surveys (which was predominantly unidentified Myotis species)." MVE requests removing this from the analysis, as the FEIS analysis should not be based on speculation of identifying species from unidentified call information.	As stated in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations), "The western small-footed bat was recorded during both years of acoustic monitoring surveys and was the most active species at the lava crater roost site (WEST 2021a, 2022a), which accounted for approximately 80% of western small-footed activity recorded in 2021. Although very few western small-footed bat passes were recorded during the first year of surveys, the species accounted for nearly 74% of the passes that could be identified to the species level during the second year. This is likely due to improvements in the ability to differentiate Myotis calls to the species level during the second year (WEST 2022a), and the species likely accounts for most of the activity recorded during summer in the first year of surveys (which was predominantly unidentified Myotis species)." It is important to disclose the reason for the large difference observed in western small-footed bat activity between the 2 years of acoustic monitoring, and this is the most plausible explanation. There are sufficient data to indicate western small-footed bats regularly use the siting corridors and removing this statement would not change the results of the analysis in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts).
11978-116	Magic Valley Energy, LLC	18. Section 3.03.1.2.2 - Bat Populations "Although the hoary bat is one of the most widespread and numerous bat species in the United States, evidence shows that the population is beginning to decline rapidly and that the growth of wind farms is driving this decline (Allison 2018; Electric Power Research Institute 2020; Frick et asheepl. 2017; Rodhouse et al. 2019)." The statement that wind turbines are 'driving the decline' of hoary bat populations is not supported by the sources given in the DEIS. MVE requests that more suitable language could be: "… the growth of wind farms could be contributing to the decrease in hoary bat populations…"	Multiple lines of evidence are presented in these studies to support the conclusion that the expansion in wind energy facilities is one of the primary factors contributing to the observed declines in populations of migratory tree bats, including the hoary bat. EPRI (2020a) in particular states that "Hoary bat population declines of 50% or more were likely without fatality reduction regardless of initial abundance. Such declines may have already occurred." The probability of hoary bat extinction varied widely based on the initial population size (which is not well known), which introduces uncertainty as to the magnitude of the impact of wind energy on hoary bat populations. However, this does not affect the conclusion that wind energy development is one of the largest factors contributing to the declines of hoary bats and other migratory tree bats. Instead, the question that remains to be answered is to what degree fatalities need to be reduced through the implementation of curtailment and other mitigation strategies to prevent further population declines and a trend toward federal listing.
11978-117	Magic Valley Energy, LLC	19. Section 3.03.1.3 "Caves, lava tubes, and known roost sites would be avoided, and the effects to other roosting features (such as shrubs and trees)." Shrubs are not considered adequate roosting habitat for bat species. MVE requests this statement be modified to: "Caves, lava tubes, and known roost sites would be avoided, and the effects to other roosting features (such as trees)."	Shrubs are considered adequate roosting habitat for many species, especially in environments where trees are sparse, such as in the siting corridors. Therefore, no change was made.
11991-10	Julie Abo	Why were these tests being done in this area prior to the NOI publishing on August 20, 2021? To document seasonal, spatial, and temporal variation in bat activity and to evaluate species composition, WEST monitored bat activity in and near the analysis area at two long-term acoustic stations between April 13 and November 1, 2020 (737 detector nights) (page 3-34, 3.3.1.1.2) It is evident that the turbines "have the potential to cause major declines in the populations of some bat species." I am concerned that the data on bats could be highly inaccurate since "patterns of bat fatalities observed at existing wind energy facilities were used as the basis for determining the likelihood for collision" and the proposed project would include turbines that are larger in diameter than any that currently exist.	Baseline resource studies, such as the bat features assessment and acoustic monitoring surveys, were conducted to gather site-specific information to inform the development of alternatives and analysis in the EIS. These studies followed the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012), which recommend surveys across multiple seasons and years to identify temporal variations in bat use. These studies must be initiated prior to the publication of the NOI in order for the BLM to comply with 40 CFR 1501.10(b)(2), which requires the BLM to complete the EIS within 2 years of publishing the NOI. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "available data from existing wind farms . . . had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the Lava Ridge Wind Project." While it is likely that newer, larger turbines are underrepresented in the available data on bat fatality rates at existing U.S. wind energy facilities, there is currently no established relationship between bat fatalities and turbine height. Due in part to the uncertainty in quantifying fatality rates prior to construction, mitigation measures for bats include postconstruction bat fatality monitoring to assess bat fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as

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			well as additional monitoring to assess the effectiveness of adaptive management measures. The BBCS (Appendix M in MVE [2023]) provides additional details on the measures MVE would implement to minimize or avoid impacts to bat populations. EIS Appendix 4 (Mitigation) describes additional mitigation measures that the BLM would require MVE to implement to further reduce impacts (see Table App4-4). If unresolved impacts to bat populations remain after the implementation of the measures, compensatory mitigation would be required (see Mitigation Framework for Birds and Bats in EIS Appendix 4). Together, the implementation of these mitigation measures will allow the BLM to more accurately assess the fatality rate for individual bat species and provide flexibility so that specific adaptive management measures can be targeted to reduce those fatalities as needed.
12130-8	Brenda Pace	Absence of local background information. The DEIS includes little to no reference to consultation with local or regional bat experts involved in bat surveys and research in and around the Lava Ridge Wind project area or in similar settings on the Snake River Plain. Bats are not mentioned in Appendix 10 “Consultation and Coordination, Mitigation Framework, EIS Literature Cited, and Preparers” or in Section 1.6 “Agency Consultation” in the “Bird and Bat Conservation Strategy”. I believe that wildlife biologists at Craters of the Moon National Monument and Minidoka National Wildlife Refuge would have provided important local information in published and unpublished survey data (Barnett 2014, NW Bat Hub 2023, Stefanic and Rodhouse 2013), on local roost characteristics, and research needs. University personnel (Brigham Young University-Idaho, Idaho State University) and members of the Idaho Bat Working Group (Rita Dixon and Bill Doering, POCs) and the East Idaho Bat Collaborative (David Dressel, POC) would have provided unique knowledge and experience with ongoing bat monitoring and research on the Snake River Plain (Call et al. 2018, Weller et al. 2018, Whiting et al. 2018a, 2018b, 2021, 2022). As it is, only a few important local studies/reports are briefly acknowledged in the DEIS, even though many more are easily located in published literature. ... daho bat experts may have also provided valuable assistance for the assessment of roosting habitat and at lava tube caves, in particular, by providing suggestions that would have resulted in a more comprehensive assessment of the Lava Ridge Wind project area. As this roost assessment is critical for micro-siting of turbines and other project components, I recommend that these local experts be invited to review the roost feature assessment completed for the DEIS (Section 3.3.1.1.1) to provide recommendations on any additional investigations that might be necessary.	As described in the Scoping section in EIS Appendix 10 and in the project scoping report linked in this section, the BLM conducted a robust public scoping process that included distribution of electronic and paper scoping letters, publication of an NOI in the *Federal Register*, paid advertisements in the local newspaper, posting on the BLM project website, and two public scoping meetings. The BLM took similar measures to advertise the public comment period for the draft EIS. The BLM also consulted with IDFG, NPS, NREL, and USFWS during the development of the analysis in EIS Chapter 3; see EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers). The final EIS has been revised to include discussion of literature provided in public comments on the draft EIS and additional literature review conducted for the final EIS. The TAC would be responsible for continuously evaluating the latest scientific data, literature, and technologies when making recommendations on adaptive management and compensatory mitigation needs; the final EIS has been revised to include additional details on the TAC and their responsibilities (see additional measure mm).
12130-9	Brenda Pace	It is likely that these Idaho experts would have recommended that acoustic detectors deployed in 2020 at the two “long term acoustic stations” in the Lava Ridge project vicinity be placed at the regional standard of 10 ft above ground surface (NW Bat Hub 2022) rather than at the very low height of 5 ft above ground surface in the DEIS data. At this low level, echoes from the ground surface and vegetation can confound or mask clean, clear bat calls. I do appreciate that this deployment error was corrected during data collection in 2021, but stress that a full season of acoustic data collection for the DEIS was compromised.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality; adaptive management measures would be implemented as needed if high fatality rates are observed.
12130-10	Brenda Pace	Based on my own experience participating in surveys of many lava tube caves and acoustic data collection for bats in Idaho, I recommend the BLM consider additional preconstruction acoustic data collection at the small caves investigated in 2021 to target Fall and Spring, when these features, however “small, narrow [and] muddy” (DEIS pg. 3-44) they may appear, might have been used for migratory stopovers and/or during Spring dispersal from hibernacula. Despite high human use of the main chamber at Kimama Cave, I also recommend additional preconstruction investigation to determine if there is more than one entrance to this lava tube system. Lastly, I also recommend additional preconstruction field investigations for other possible roosting areas (bridges, irrigation structures, craters, landscape features) located in the Lava Ridge Wind project area, since data collection in 2021 did reveal an unexpected roost site at a small crater inside the project area. Bridges and structures over or near canals located in the project area could prove to be especially sensitive and worthy of protective buffers larger than the 1000 ft buffer proposed for the canals, themselves. I believe this additional information may help to identify roosting habitat that must be considered in micro siting of turbines and other project components.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed. The final EIS has been revised to describe how measures to minimize or avoid impacts to surface waters, including intermittent and ephemeral features as well as irrigation canals, will indirectly benefit bats.
12130-11	Brenda Pace	Exclusion of Townsend’s big-eared bat from detailed analysis. Based on my own experience and understanding, I request that BLM reconsider the decision to exclude Townsend’s big-eared bats from detailed analysis in the DEIS and complete a detailed assessment of this species for the final EIS. I also recommend that BLM also consult with local/regional bat experts on this decision. Townsend’s big-eared bats are classified as an Idaho Tier III Species of Greatest Conservation Need and a BLM special-status species, which indicates that proactive management intervention/conservation measures will likely be necessary to prevent long-term declines in the species and to slow trends toward federal listing under the Endangered Species Act. Research indicates that lava tube caves on the Snake River Plain, including Craters of the Moon National Monument and other lava tube cave-rich portions of the volcanic landscape in south-central Idaho, are of critical importance to Townsend’s big-eared bats for hibernation and raising young (Call et al. 2018, Frost et al 1996, Wackenhut 1990, Weller et al. 2018, Whiting et al. 2018). Under all alternatives, the Lava Ridge turbine arrays are well within the summertime foraging radius for these bats relative to these critically important longer-term roosting areas. Despite Townsend’s big-eared bats’ reliance on low intensity echolocation calls and the overall difficulty in detecting them in standard acoustic surveys (Kunz et al. 2007), these ‘whispering’ bats were recorded in the Lava Ridge Wind project area during acoustic surveys in both 2020 and 2021. Notably, the DEIS does not address the difficulties inherent in capturing acoustic records of these bats. Acoustic surveys conducted by the USFWS at Minidoka National Wildlife Refuge (Barnett 2014) and at NABat monitoring program grids (NW Bat Hub 2023) adjacent to the Lava Ridge Wind project area have also documented the presence of Townsend’s big-eared bats. These acoustic detections indicate that these bats are foraging widely on the Snake River Plain and in the absence of detailed research on the foraging behavior of these bats in this particular habitat, I believe there is risk in assuming that these nightly visits will always remain at low altitudes below the influence of the	Table App 3-2 in EIS Appendix 3 discloses the potential for Townsend’s big-eared bats to occur in the siting corridors based on observations during acoustic monitoring surveys and the proximity of the siting corridors to CRMO, as well as the concerns that have been raised about the potential effects of wind energy on the species in the future. Despite the proximity to known Townsend’s big-eared bat colonies at CRMO, the species accounted for very little of the bat use recorded in the siting corridors and vicinity during the first year of acoustic monitoring surveys and was not recorded during the second year of acoustic monitoring surveys (WEST 2021a, 2022b). As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities.

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		turbines proposed for installation at the Lava Ridge Wind project. I also believe that the assessment of bat roosting habitat completed for the DEIS was inadequate to fully evaluate Townsend's big-eared and other bats' Spring and Fall use of the Lava Ridge project area and as a result, the DEIS is based on incomplete information for bat roosting habitat. I understand that Townsend's big-eared bats have not been documented as fatalities in reports that are publicly available from a small sample of approximately 20 wind facilities operating in the USFWS Pacific Region (DEIS Section 3.3.1.2, Lava Ridge Avian and Bat Mortality Report). However, I respectfully submit that the DEIS does not demonstrate that any of these ~20 facilities are operating in proximity to such important habitat for Townsend's big-eared bats as that which is found on the Snake River Plain and Craters of the Moon National Monument. Furthermore, it is possible that fatalities could have been missed by searchers due to insufficient search effort, could have been found and unidentified or misidentified to species, or could have been scavenged before surveys were completed. There is simply too much uncertainty about Townsend's big-eared bats' use of the Lava Ridge project area to exclude them from detailed consideration in the DEIS. As acknowledged in the DEIS (Appendix 3, pg. 3-30), the scientists at NatureServe, which is an oft-cited source for information on the conservation status of many species, have concerns that mortality of Townsend's big-eared bats from turbine collisions may pose a threat to the species in the future as wind energy development expands further into their primary range (Cannings and Hammerson 2023). Indeed, the Snake River Plain includes the highest density of Townsend's big-eared bat hibernacula in the western U.S. (Call et al. 2018, Frost et al 1996, Wackenhut 1990, Weller et al. 2018, Whiting et al. 2018), including dense concentrations of this critical habitat in the Shoshone District BLM and Craters of the Moon National Monument. The Lava Ridge Wind project area may not include the highly sensitive hibernacula and maternity roosts of these adjoining lands, but it does provide foraging habitat for large numbers of bats that must leave the immediate area of these roosts to survive and thrive. Placement of turbines in the midst of the important patches in their habitat could result in significant, population level impacts through loss of genetic diversity and baseline population levels needed to sustain the species if fatalities are high among the multitude of small (< 20 individuals) hibernating and/or maternity colonies known to inhabit the area.	
12130-14	Brenda Pace	Applicant-Committed Measure #138 outlines siting practices to minimize impacts to birds and bats. It does not include 0.25 buffers around caves, or 0.25 buffers around bat roosts as mandated by "Additional Project-Specific Mitigation" measures outlined in DEIS Appendix 4 (Table 4-4). The BBCS must include these required buffers.	Measure n in Table App4-4 in EIS Appendix 4 (Mitigation) states that "Turbines would not be placed within 0.25 mile of known bat roosts. Other infrastructure within that buffer would be minimized." As described under Alternative B with Additional Measures in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), these additional measures are not included as part of MVE's Proposed Action but would be included in the terms and conditions for a ROW permit, if a ROW is granted and Alternative B is selected. These additional measures would also be required for Alternatives C–E and the Preferred Alternative.
12130-25	Brenda Pace	BBCS Sections 3.2.2 and 3.2.3 (and DEIS Section 3.3.1.1.1) describe preconstruction surveys for bat roosting and foraging habitat. These surveys did not adequately assess roosting habitat in the Lava Ridge Wind project area. Additional acoustic surveys and field investigations are necessary to assess Spring and Fall use of small lava tube caves and to investigate other potential roosts at bridges, irrigation structures, and lava features.	As described in Section EIS 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed.
12130-26	Brenda Pace	BBCS Section 3.0 and Table 6 summarize preconstruction data collection for birds and bats in and around the Lava Ridge Wind project. I recommend that the observations made during these surveys be added to the IDFG Wildlife Observation System (https://idfg.idaho.gov/species/observations).	The Bird and Bat Conservation Strategy (Appendix M in MVE [2023]) protocols will be finalized in coordination with the TAC and could include reporting of bird and bat observations to the IDFG Wildlife Observation System (https://idfg.idaho.gov/species/observations). The TAC would include resource specialists from the BLM, OSC, USFWS, and IDFG.
12130-27	Brenda Pace	BBCS Section 4.3.2 briefly discusses indirect impacts to bats and impacts are also discussed in DEIS Section 3.3.1.2.2. I recommend that BLM consider whether a prolonged period of construction at night would cause additional impacts to bats in the Lava Ridge Wind project area and restrict nighttime operating hours as needed for protection. Near documented roosts, this might be necessary near dawn and dusk, when activity levels tend to peak.	As described in Section 2.5 of MVE (2023), construction would be predominantly during weekdays, but some weekend and evening work may be required during peak construction periods. Measure n in Table App4-4 in EIS Appendix 4 prohibits placement of turbines within 0.25 mile of known bat roosts and minimization of other infrastructure within this buffer. Therefore, additional measures to minimize impacts to bat roosts during construction are not warranted.
12130-28	Brenda Pace	BBCS Section 5.1.2 must be updated to include 0.25-mile protective buffers around caves and known bat roosts.	Measure n in Table App4-4 in EIS Appendix 4 (Mitigation) states that "Turbines would not be placed within 0.25 mile of known bat roosts. Other infrastructure within that buffer would be minimized." As described under Alternative B with Additional Measures in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), these additional measures are not included as part of MVE's Proposed Action but would be included in the terms and conditions for a ROW permit, if a ROW is granted and Alternative B is selected. These additional measures would also be required for Alternatives C–E and the Preferred Alternative.
12130-31	Brenda Pace	Section 7.0 describes how MVE will coordinate with the USFWS, BLM, IDFG, and Idaho Office of Species Conservation on adaptive management measures to address impacts based on the results of postconstruction bird and bat fatality monitoring. In keeping with my comments above, I strongly recommend that a" Technical Advisory Committee" be formed to support a collaborative effort for implementing adaptive management through the life of the Lava Ridge Wind project. These agency personnel and local experts can best determine if fatality levels have reached unacceptable levels to species of concern (thresholds for adaptive response) and recommend implementation of appropriate mitigation measures that may include operational curtailment strategies (adaptive management).	The BBCS (Appendix M in MVE [2023]) describes measures to minimize or avoid impacts to birds and bats that MVE has committed to; these measures are also presented in EIS Appendix 4 (Mitigation) in Tables App4-2a through App4-2o. Additional project-specific mitigation that would be required by the BLM are listed in Table App4-4; additional measure w requires consultation with the TAC to determine appropriate thresholds for an adaptive management response. Additional details on the TAC and adaptive management measures have been added to EIS Appendix 4 (Mitigation)
12130-32	Brenda Pace	I believe that the DEIS falls short in presenting adequate local background information to inform the design of survey strategies, fully characterize risk, and develop meaningful mitigations. This is particularly problematic for bats. Discussion is included in my specific comments in paragraphs to follow. USFWS Wind Energy Guidelines (2012) specifically state, "The Service recommends that the developer make contact with federal, state, tribal, and local agencies that have jurisdiction or management authority over the project or information about the potentially affected	As described in the Scoping section in EIS Appendix 10 and in the project scoping report linked in this section, the BLM conducted a robust public scoping process that included distribution of electronic and paper scoping letters, publication of an NOI in the *Federal Register*, paid advertisements in the local newspaper, posting on the BLM project website, and two public scoping meetings. The BLM took similar measures to advertise the public comment period for the draft EIS. The BLM also consulted with IDFG, NPS, NREL, and USFWS during the development of the analysis in

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		resources. In addition, because key NGOs and relevant local groups are often valuable sources of relevant local environmental information, the Service recommends that developers contact key NGOs, even if confidentiality concerns preclude the developer from identifying specific project location information at this stage. These contacts also provide an opportunity to identify other potential issues and data not already identified by the developer." Similar instructions are also included in wind energy development guidelines from nearby states (WDFW 2009, WGFD 2021)	EIS Chapter 3; see EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers).
12130-35	Brenda Pace	The BBCS is a critically important summary and guide for the conservation measures that have been or will be taken to identify, avoid, minimize, and mitigate impacts resulting from the Lava Ridge Wind project. Despite being dated 2022, the BBCS does not accurately reflect the results of pre?construction bat surveys conducted in 2021 and does not include many of the prescribed mitigation measures for bats and birds that are included in the DEIS Appendix 4 or in DEIS Section 3 pg. 3-52-53.	The draft EIS provided the BBCS in draft format, as submitted by MVE in October 2022. The results of the 2021 bat acoustic monitoring surveys (WEST 2022a) were not available until November 2022 and thus were not included in the draft BBCS. However, the results of the 2021 surveys were summarized in the draft EIS in Section 3.3.1.1.2 (Affected Environment, Bat Populations) and the BBCS has since been updated to include a summary of the 2021 bat acoustic monitoring surveys. The BBCS is a document prepared by MVE; mitigation measures for birds and bats described in the BBCS are included in MVE's applicant-committed measures in Tables App4-2a through App4-2o in EIS Appendix 4 (Mitigation). The BLM has identified additional measures required by BLM policy (see Table App4-3) and additional project-specific measures (see Table App4-4) needed to further minimize or avoid impacts. The measures strengthen, add to, or supersede MVE's applicant-committed measures and would be included the terms and stipulations of the ROW grant, if issued.
12230-2	Elizabeth Lampert; BLM Shoshone Office	Stopping Lava Ridge will preserve our bats that pollinate our crops and eat the bad insects. They are also protected under Idaho Code as non-game species.	While there are species of nectar-feeding bats in the tropics that provide important pollination services for crops, there are no nectar-feeding bats in Idaho and none of the bat species with the potential to occur in the siting corridor are considered pollinators. See EIS Section 3.11 (Pollinators and Insects) for a discussion of impacts to pollinators. As described in response to comment 11753-3 (see in Table A-3b, Bats), there have been no studies quantifying the impact of bat fatalities at wind energy facilities on local insect populations, but mortality of these insects would also increase as a result of collisions with operational turbines. As stated in IAC 13.01.06 Section 300.02 "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management . . . "
12230-3	Elizabeth Lampert; BLM Shoshone Office	Bats will be killed by Pulmonary Barotrauma - their lungs will explode in the low pressure zones created around the turbines.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), "Bat fatalities from barotrauma (due to rapid changes in air pressure near spinning turbine blades) have been documented, but there is little evidence to suggest that this is an important source of mortality at wind energy facilities (AWWI 2016)." The final EIS has been revised to include a discussion of Lawson et al. (2020) and Guest and Hein (2023), which support the conclusion that there is insufficient evidence to support the conclusion that barotrauma is a significant source of bat mortality at wind energy facilities. Guest and Hein (2023) noted that reducing bat interactions with operational wind turbines is the best solution for reducing either cause of mortality (i.e., collision vs. barotrauma).
12899-1	Rob Morris	In reading/perusing the Analysis of Avian and Bat Mortalities at Existing Wind Farms that was used in drafting the EIS for the Lava Ridge Wind Project, I see several errors and discrepancies. 2.2.1 and 2.2.1.1 (pg 6) of the Analysis of Avian and Bat Mortalities fails to extrapolate the data to the size of the LR project and fails to differentiate for possible mortality data per species: how can an estimate of bird/bat deaths be made when the Analysis itself admits it is incomplete? All these data were taken from several sites that are much smaller in size than the LV project; you are, extrapolating beyond existing data points. For the BLM to approve any such project that affects so many species that are BCC, BLMSS and SGCN is beyond understanding.	The analysis presented in the EIS is based on a thorough review of the available scientific literature. The BLM also solicited input from IDFG, USFWS, NREL, NPS, and other relevant agencies during the development of the analysis in the EIS. EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B) describes estimated fatality rates for each species analyzed in detail. Postconstruction monitoring would be implemented to assess bat and avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities.
12982-14	Jerry Taylor	Numerous bat species were apparently encountered in a brief inventory by the company. Only two were discussed in any detail, the others only as being present. The DEIS can't presume to mitigate future impacts below significance on bat species they know nothing about. Suspend the EIS process and set about gathering the necessary information upfront to inform proper impact analysis.	EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) describes bat species with the potential occur in the siting corridors (see Table 3.3-2). In addition to the 13 species detected during MVE's acoustic monitoring surveys (WEST 2021a, 2022b), this section describes 4 other species that may occur in the siting corridors based on the BLM's review of the publicly available literature and coordination with IDFG, NPS, and USFWS. As described under the subheading "Species Analyzed in Detail," each of these species was individually evaluated for its likelihood of colliding with turbines and the potential for those fatalities to lead to population-level effects. Twelve of these species were determined to have a low likelihood of population-level effects. Though effects to these 12 species may occur (as analyzed and described in Table App3-2 in EIS Appendix 3 [Issues Analyzed in Brief]), none of these species would be expected to experience a readily detectable population decline in the analysis area. Thus, to comply with 40 CFR 1502.2(b), this EIS "has only [a] brief discussion of other than significant issues" and focuses on species with a moderate to high likelihood of population-level effects from the project. The five species (big brown bat, little brown bat, western small-footed bat, hoary bat, and silver-haired bat) that were determined to have a moderate to high potential for population-level effects are described in detail below. Cave-hibernating bats are addressed separately from migratory tree bats because the risk factors for each group are notably different. EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) discloses the potential for the action alternatives to result in significant effects to bat populations without the implementation of measures to minimize or avoid bat fatalities. As described in this section, MVE has committed to a number of measures that are expected to reduce bat fatalities associated with the action alternatives. After evaluating the potential effectiveness of these applicant-committed measures (see Tables App4-2a through App4-2o in EIS Appendix 4 [Mitigation]), the BLM developed additional required mitigation measures (see Table App4-4 in EIS Appendix 4) that would be implemented to reduce bat fatalities. These measures include postconstruction bat fatality monitoring to assess bat fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented. Additional monitoring would be conducted to assess the effectiveness of adaptive management measures. EIS Section 3.3.1.4 (Bat Populations and Roosting Habitat, Compensatory Mitigation) discloses the potential for residual impacts to bats after the implementation of mitigation, including adaptive management measures, and a Mitigation Framework for Birds and Bats is included in EIS Appendix 4 to address these remaining impacts.

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12988-1	Melody Asher	Your DEIS says "At least two other wind energy facilities are planned near the Lava Ridge Wind Project: the Taurus Wind Project, which would be immediately northwest of the Lava Ridge Wind Project, and the Salmon Falls Wind Project, which would be approximately 30 miles south. The Taurus Wind Project would be similar in size and scale to the Lava Ridge Wind Project (estimated capacity of 1,500 MW), and the Salmon Falls Wind Project would be smaller (estimated capacity of 800 MW). Though it is impossible to accurately predict the bat fatality rate from these facilities, the cumulative impacts of numerous facilities with high fatality rates across the landscape could compound the impacts on bat populations. The potential effect of the expansion of wind energy on bat populations in the analysis area would depend on several site specific variables at each project location, the number and size of turbines that would be used, and the implementation and effectiveness of mitigation measures to reduce impacts to bats." I did not see any bats the other day when I was out in the area but wanted to let you know that bats are a concern. Many bat populations are in decline. They are at risk from wind energy projects and white-nose syndrome. We need them for pollination and pest control. I think more review of the bat population, roost sites and areas of use are needed since bat studies show that bat declines are larger the longer the project exists.	The analysis presented in the EIS is based on a thorough review of the available scientific literature. The BLM also solicited input from IDFG, USFWS, NREL, NPS, and other relevant agencies during the development of the analysis in the EIS. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed.
13006-14	Leon Smith	5) Recommend the DEIS includes additional population viability/sustainability assessment on raptors and bats.	The analysis presented in the EIS is based on a thorough review of the available scientific literature. The BLM also solicited input from IDFG, USFWS, NREL, NPS, and other relevant agencies during the development of the analysis in the EIS.
13006-15	Leon Smith	6) Recommend the DEIS include a full analysis of the Townsend's big eared bat, not a cursory review.	The conclusion that Townsend's big-eared bats have a low likelihood of colliding with turbines is based on the best available scientific data. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), postconstruction monitoring would be implemented to assess bat fatality rates; adaptive management measures would be implemented as needed if high fatality rates are observed.
13006-22	Leon Smith	13) Recommend BLM consider how a potential listing of little brown bat might affect the DEIS.	EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) disclosed the potential effects of the action alternatives on the little brown bat. USFWS consultation would be required for project operations if the little brown bat or other bats that occur in the siting corridors are listed under the ESA in the future.
13008-11	Scott Hauser	The bat resources section is quite concerning. First, it has a typo, or what is assumed to be a typo. It states, "None of the 1 bat species are federally or state-listed, although the USFWS is currently conducting a Species Status Assessment for the little brown myotis (Myotis lucifugus), which is being considered for listing under the federal Endangered Species Act. Five of the 1 potentially…" We are assuming the 1 is intended to be 14. If this is not the case, we request further information on what this paragraph is intended to state.	This text does not appear in the EIS or the WEST reports referenced in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). See Table 3.3-2 in EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) for a list of bat species with the potential to occur in the siting corridors and their special-status designations; this section also describes the range-wide status review USFWS is currently conducting for the little brown bat and discloses the potential for this species to become listed under the ESA in the future.
13008-12	Scott Hauser	A more concerning issue is that the DEIS states, "The extent that bats use this potential habitat for roosting is largely unknown at the Project…" This is followed up with an explanation that bats are unlikely to use the project area. However, the use is largely unknown, and there is no explanation of how, or if, Lava Ridge intends to fill this knowledge gap. Bats are widely misunderstood and under studied, all while bat populations are decreasing nationwide. Thus, it is troubling that Lava Ridge seems to be ignoring the blaring issue of unknown effects. We highly encourage Lava Ridge to enhance their monitoring and research on the effects the project may have on bats and deepen the understanding of bat usage of the project area.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), preconstruction bat use is not correlated with postconstruction fatality rates. Postconstruction monitoring would be implemented to assess bat and avian fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities. Preconstruction acoustic monitoring data for bats was used to identify areas of concentrated use, such as canals and roost sites, and develop measures to limit development in close proximity to these features (see EIS Appendix 4 [Mitigation] for additional details). The final EIS has been revised to include additional measures to minimize or avoid impacts to surface waters, including intermittent and ephemeral features, which will indirectly benefit bats.
1396-1	No Name Provided	The Brown Bat of Idaho is slated to be added to the Federally endangered species list. Please review the article below as it supports the threat to the life of bats and their importance to our ecosystem killing insects that are hazardous to our crops.</p> Mechanical wind turbines are killers of this creature by the blades or the low pressure zones which cause their lungs to explode. How will turbines know the bat is in the area? How will the power company protect the bat?Will they be allowed to obtain a permit, such as the one created by the Obama administration, which allows the taking/killing of eagles?	EIS Section 3.3.1.1.2 (Affected Environment, Bat Populations) describes the range-wide status review USFWS is currently conducting for the little brown bat and discloses the potential for this species to become listed under the ESA in the future. The article provided in the comment is an interview with a researcher studying bats and COTM and does not present empirical evidence that can be used to support the analysis in the EIS. However, EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) discloses the potential for the action alternatives to result in significant effects to the populations of certain bat species, including the little brown bat, without the implementation of measures to minimize or avoid bat fatalities. As described in this section, MVE has committed to a number of measures that are expected to reduce bat fatalities associated with the action alternatives. After evaluating the potential effectiveness of these applicant-committed measures (see Tables App4-2a through App4-2o in EIS Appendix 4 [Mitigation]), the BLM developed additional required mitigation measures (see Table App4-4 in EIS Appendix 4) that would be implemented to reduce bat fatalities. These measures include postconstruction bat fatality monitoring to assess bat fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures. EIS Section 3.3.1.4 (Bat Populations and Roosting Habitat, Compensatory Mitigation) discloses the potential for residual impacts to bats after the implementation of mitigation, including adaptive management measures, and potential compensatory mitigation measures are described in EIS Appendix 4 (Compensatory Mitigation Actions in the Mitigation Framework for Birds and Bats). Additional discussion of mitigation measures is provided in the alternatives analysis in EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts); although there are currently no commercially available sensor-based curtailment systems that can be used to detect approaching bats and adjust turbine operations, these systems are under development and could be used as adaptive management in the future, if necessary. Unlike bald and golden eagles, there is currently no formal system in place to permit incidental take of non-ESA bat species resulting from the operation of a wind energy facility because there are currently no laws or regulations in place that prohibit incidental take of such bats. However, the measures to avoid or minimize impacts to bat species described in EIS Appendix 4 are designed to meet the BLM's obligation to ensure that the selected alternative does not contribute to a trend toward federal listing or loss of population viability for any BLM special-status bat species. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). As described in response to comment 11753-3 (see in

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			Table A-3b, Bats), there have been no studies quantifying the impact of bat fatalities at wind energy facilities on local insect populations, but mortality of these insects would also increase as a result of collisions with operational turbines.
1531-1	Sue Page	You may or may not be aware, bats are a legally protected species in Idaho. Under Idaho Code they are classified as "Protected Nongame Species". It is illegal to harmed, harassed or killed. There are over 14 different species of bats that live in Idaho. It is also my understanding that the brown bat is being considered to be added to the endangered species list. Safe our wildlife. Vote no on Lava Ridge Wind Project	As stated in IAC 13.01.06 Section 300.02 “Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management.”
5896-11	Mike Tylka	Bats and birds. The desert ecosystem is very fragile. Bats and birds continue to be a significant part of this overall ecosystem and it is impossible to predict how many of these creatures will be killed due to the construction taking place and the turbine system after operation begins. Therefore, why risk sacrificing any of the identified or non-identified species?	Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction bat fatality monitoring to assess bat fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), this approach is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).
8458-5	Sue Page	Bats will be killed due to the low pressure zones these turbines create by pulmonary barotrauma - their lungs burst.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), “Bat fatalities from barotrauma (due to rapid changes in air pressure near spinning turbine blades) have been documented, but there is little evidence to suggest that this is an important source of mortality at wind energy facilities (AWWI 2016).” The final EIS has been revised to include a discussion of Lawson et al. (2020) and Guest and Hein (2023), which support the conclusion that there is insufficient evidence to support the conclusion that barotrauma is a significant source of bat mortality at wind energy facilities. Guest and Hein (2023) noted that reducing bat interactions with operational wind turbines is the best solution for reducing either cause of mortality (i.e., collision vs. barotrauma).

BIRDS

Table A-3c. Birds

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1042-3	WildLands Defense	It is sickening to think of Golden Eagle, rare bat and migratory bird and bat kills this project will inflict. Full and detailed studies of avian and bat migration patterns across the Snake River Plain and region must be undertaken over multiple years and assessed in a SEIS. This will greatly expand increase the wind turbine wall of death migrating birds and bats face in attempting to fly north to nesting/breeding habitats. The full adverse indirect and cumulative effects of all the existing turbines – and foreseeable additional projects – on BLM, state and private lands in this region must be fully assessed in a SEIS hard look analysis. Detailed multi-year studies of avian and bat migration patterns must be undertaken now – across this landscape and all the Snake River plain, and the breeding bird site populations harmed. WLD requested such studies take place as part of the Gateway EIS, and Idaho BLM blindly ignored this – being content to kill unknown numbers and species of birds and bats. There is no proper way to estimate “take” unless pre-decisional studies of fall and spring migration patterns, routes and impacted populations are conducted. This is necessary to determine what percentage of an avian population uses which routes. This is an example of the huge amount of necessary baseline biological information that must be collected in order to properly evaluate a projects; amount of take, to understand foreseeable impacts on local, regional and range-wide species populations. This is especially critical given the grave concern over the loss in recent decades of billions of birds, See Rosenberg et al; 2019 for example. Further, the developer must research and develop models based on inversions, storm fronts, rainy weather, etc. that possibility of mass avian and/or bat deaths during spring and fall migrations. How might population viability be impacted? Again, it is impossible to make informed comparisons between alternatives until this is done.	As described in response to comment 1042-27 (see in Table A-3c, Birds), detailed studies of migratory routes in the analysis area are beyond the scope of the EIS but are included as potential adaptive management or compensatory mitigation for avian and bat species; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. In addition to the avian use surveys (which included more detailed evaluations of bald and golden eagle use), MVE conducted 2 years of raptor nest surveys, 2 years of greater sage-grouse surveys, 2 years of bat acoustic monitoring surveys, and a bat roosting features assessment. In addition to these project-specific surveys, the BLM conducted a review of the publicly available literature and coordinated with state and federal wildlife agencies to obtain additional information. This information is summarized in EIS Sections 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment), 3.3.2.1 (Avian Populations, Affected Environment), 3.3.3.1 (Eagles, Affected Environment), and 3.3.4.1 (Greater Sage-Grouse, Affected Environment). Due in part to the uncertainty in quantifying fatality rates prior to construction, postconstruction bat fatality monitoring would be implemented to assess bat fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities. Additional monitoring would be conducted to assess the effectiveness of adaptive management measures; see the BBCS and EIS Appendix 4 for additional details. As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B), this approach is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). Indirect effects to bats are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-5 though AIB-8. Cumulative effects to bat and avian species are disclosed in EIS Sections 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts), 3.3.2.2.7 (Avian Populations, Cumulative Impacts), 3.3.3.2.7 (Eagles, Cumulative Impacts), and 3.3.4.2.7 (Greater Sage-Grouse, Cumulative Impacts). The cumulative effects analyses included the identification of existing wind turbines within the analysis area as well as a discussion of reasonably foreseeable wind energy development. As described in Section 3.3.2.2.7, the number of birds estimated to be killed by collisions with turbines is relatively small in comparison to estimates of fatalities from other anthropogenic sources such as collisions with vehicles, buildings, transmission lines, and communication towers; exposure to pesticides and other toxic chemicals; and predation by domestic and feral cats (AWWI 2016; Loss 2016; National Wind Coordinating Collaborative 2010). Given this, collisions with turbines and wind energy development alone do not appear to be a threat to most avian populations (AWWI 2016; Choi et al. 2020). Even so, as the number of wind facilities increases, collisions with turbines will represent an increasingly large proportion of all collisions with humanmade structures and will have correspondingly greater effects on bird populations (National Wind Coordinating Collaborative 2010). Although the expansion of wind energy may not be the primary driver for the decline of most avian species, fatalities from turbine collisions exacerbate other impacts that have led to these declines and are becoming an increasingly important source of avian mortality. For species that are already declining, and for species with low reproductive rates, even a relatively small increase in the fatality rates could have a significant impact on their populations in the analysis area. The BLM appreciates that Rosenberg et al. (2019) and many others have found evidence of widespread declines in North American avian populations; however, as described in EIS Section 3.3.2.1.2 (Affected Environment, Species

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			Analyzed in Detail), “to comply with 40 CFR 1502.2(b) this EIS “has only [a] brief discussion of other than significant issues” and focuses on species with a moderate to high likelihood of population-level effects from wind energy development.” Thus, the EIS does not summarize the available literature on general avian population declines (which are primarily related to factors other than wind energy development, as described above) and focuses on those species at greatest risk of experiencing significant impacts from the action alternatives. Measures to minimize or avoid avian and bat fatalities from collision with operational turbines were developed in consideration of the factors that are known to influence fatality rates, such as implementing curtailment during the fall migratory period for bats (see EIS Section 3.3.1.2.2 [Bat Populations and Roosting Habitat, Alternative B]). Bird fatalities from turbine collisions, on the other hand, are not strongly influenced by migratory behavior (see EIS Section 3.3.2.1); therefore, mitigation for avian populations focus on measures that target species whose flight characteristics put them at greater risk of turbine collisions (i.e., large diurnal raptors). EIS Section 3.3.1.2.2 also discusses how curtailment strategies can be refined by incorporating variables such as temperature and barometric pressure. As stated in this section “using data collected during postconstruction monitoring, MVE would develop curtailment strategies in coordination with the BLM, USFWS, IDFG, and Idaho Governor’s Office of Species Conservation (OSC) (applicant-committed measure 157). The curtailment strategies would define standard operating procedures for operation during different seasons (i.e., migratory periods) and different times of the day. The standard operating procedures would describe how operations staff would monitor for the presence of bats (and raptors) around turbines, how the decision to curtail specific turbines would be made, and how the curtailment would be implemented. “ As described in EIS Sections 3.3.1.3 (Bat Populations and Roosting Habitat, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), 3.3.2.3 (Avian Populations, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), 3.3.3.3 (Eagles, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), and 3.3.4.3 (Greater Sage-Grouse, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), with the implementation the mitigation measures listed in EIS Appendix 4 (Mitigation) none of the action alternatives are expected to result in irreversible impacts because impacts are unlikely to lead to a loss of population viability or a trend toward listing under the ESA for any avian or bat species. Rosenberg, K.V., A.M. Dokter, P.J. Blancher, J.R. Sauer, A.C. Smith, P.A. Smith, J.C. Stanton, A Panjabi, L. Helft, M. Parr, and P.P Marra. 2019. Decline of the North American avifauna. *Science* 366(6461): 120–124. Available at: https://www.science.org/doi/10.1126/science.aaw1313. Accessed December 29, 2023.
1042-4	WildLands Defense	We are alarmed that the EIS is basing its avian estimates on one year of ‘studies”, and that BLM cares so little about numerous sensitive species that it just lets the EIS contractor bundle all those birds including numerous sensitive species into “21 smaller bird species”. Further, we simply do not believe there are so few Burrowing Owls and Long-Billed curlews here. [graphic showing Table 3.3-3] We also greatly question the accuracy of the inventories for avian species and sensitive species - as the consultant claims to have found only two Burrowing Owl nests. Further, we can find no legitimate basis for using a mere one mile from siting corridors for an analysis. [graphic showing Table 3.3-4] As WLD also commented in the Gateway EIS, all transmission lines are also likely to be lethal to avian species, and all must have avian flight diverters, too.	The results of the second year of avian use studies were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. The summary of the avian use surveys in Table 3.3-7 focuses on the data for species or groups discussed in the EIS. Detailed avian use data is presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study was included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. As disclosed in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail), burrowing owl use in the siting corridors is likely to be higher than reported because avian use surveys were not designed to detect the species. Therefore, mitigation measures for burrowing owls were modified and expanded in the final EIS; these include preconstruction surveys for burrowing owl nests and avoidance buffers for active nests (additional measure q) as well as the removal of loose rocks to avoid creating habitat for prey (additional measure s); see EIS Section 3.3.2.2.2 (Avian Populations, Alternative B with Additional Measures) and EIS Appendix 4 [Mitigation]). The description of long-billed curlew in EIS Section 3.3.2.1.1 discloses the potential that long-billed curlew use in the siting corridors could be higher in particularly wet years when playas and vernal pools are inundated and describes the importance of the breeding population in western Idaho to the overall population in BCR 9, and thus, concludes that even a relatively low fatality rate from collisions with operational turbines could possibly result in a decline in the BCR 9 population. The analysis area for avian populations is BCR 9, as described in 3.3.2 (Avian Populations); Table 3.3-10 summarizes raptor nests recorded within 1 mile of the siting corridors during the 2020 and 2021 raptor nest surveys (WEST 2020, 2021b); as described in the table notes, burrowing owl nests were not targeted during either year of raptor nest surveys and the burrowing owl nests described in the table were observed incidentally during other biological surveys. Section 3.3.2.1.1 in EIS Appendix 9 summarizes additional raptor nests detected beyond 1 mile of the siting corridors during the raptor nest surveys. Details on the raptor nest survey methods, including supporting rationale for the study areas selected, are provided in the 2020 Raptor Nest Survey Memo (WEST 2020) and 2021 Raptor Nest Survey Report (WEST 2021b). MVE has committed to constructing all overhead collector and transmission lines in compliance with APLIC standards (APLIC 2006, 2012), which include the use of line markers or flight diverters to reduce avian collisions (applicant-committed measure 30). Effects to raptors from collisions with or electrocution by overhead powerlines are described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-4. Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction avian fatality monitoring to assess the actual long-billed curlew and burrowing owl fatality rate; adaptive management measures would be implemented as needed to reduce fatalities, and additional monitoring would be conducted to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details.
1042-9	WildLands Defense	“Highest estimated avian fatality rate from collisions with turbines: 3,240–5,654 (mean), 10,200–17,799 (maximum) birds per year. Most avian species are unlikely to experience population-level effects, but some special- status species (e.g., ferruginous hawk, long- billed curlew, short-eared owl, and burrowing owl) could experience population	As stated in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), it is impossible to accurately predict the fatality rate for the project because preconstruction use is not correlated with postconstruction fatality rates (WEST 2011). For comparison among action alternatives, this EIS estimates bird fatalities that could occur based on the mean

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		declines …". What are the current local, regional and range-wide populations and population trends of these species? What threats do all of these populations face? In skimming the EIS, we see absurd claims that try to minimize harms by saying small passerine birds have short life spans – and so we are to conclude that they will be proportionately less effected – and this is total nonsense. In essence, the wildlife and ecological analysis of this project is severely flawed, and a supplemental EIS with a range of protective alternatives must be prepared, based on systematic competent and scientifically credible on-the-ground surveys for all affected biota.	fatality rate for BCR 9 (2.7 birds per MW per year). This EIS also presents the number of fatalities that could occur based on the maximum fatality rate observed in BCR 9 (8.5 birds per MW per year) (Table 3.3-12). EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail) provides a summary of important life history traits, demographic information, and susceptibility to impacts from wind energy development for the four species analyzed in detail in the EIS (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl). Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) presents this information for the special-status avian species with the potential to occur in the siting corridors that were determined to have a low likelihood of population-level effects. Other threats to avian species are described in EIS Section 3.3.2.1.2 (Avian Populations, Existing and Future Trends and Actions). The EIS does not conclude that the shorter lifespan of small passerines reduces the potential for impacts to their populations from fatalities due to collisions with operational turbines. As described in EIS Section 3.3.2.1.1, unlike large, long-lived avian species with low reproductive rates (like those species analyzed in detail in the EIS), the smaller size and shorter lifespan of passerines is correlated with higher reproductive output as well as lower annual survivorship. Therefore, their populations are less sensitive to increased mortality. Most small passerines also have very large populations and turbine-related fatalities constitute a small percentage of their total population size (typically < 0.02%) (AWWI 2016; Erickson et al. 2014). Further, as described in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), "Despite the trend toward increasing avian fatalities from wind energy, this source of mortality will remain relatively small when compared to other sources of avian mortality—such as collisions with vehicles, buildings, transmission lines, and communication towers; exposure to pesticides and other toxic chemicals; and predation by domestic and feral cats (AWWI 2016; Loss 2016; National Wind Coordinating Collaborative 2010)—and for most species, this source of mortality will be too small to have a notable effect on their populations (AWWI 2016; Choi et al. 2020)." This section also describes the higher avian fatality rates associated with other forms of energy generation and the potential that alternatives with lower generating capacities could result in greater impacts to avian populations if other types of energy generation are used to satisfy the demand for electricity that would have been generated under alternatives with higher generation capacities.
1042-27	WildLands Defense	Migratory birds such as ducks, geese and swans will travel through the area during migratory season, although according to studies, it is not a primary migration corridor. [This is completely unacceptable, and WLD believes it seriously under-estimates the "take" that will occur. What are these studies, how were the conducted and what birds were studied?	See EIS Section 3.3.2.1 (Avian Populations, Affected Environment) for a summary of MVE's avian use studies; the final EIS has been updated to include the results of the second year of study. Detailed studies of migratory routes in the analysis area are beyond the scope of the EIS but are included as potential adaptive management or compensatory mitigation for avian and bat species; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. However, patterns of seasonal use for waterfowl and other avian species can be inferred from the results of the surveys, as well as other publicly available data sources evaluated for the analysis of avian populations. This section also discloses the potential for ephemeral surface water features in the siting corridors (i.e., playas and vernal pools) to provide migratory stopover habitat for waterfowl and other avian species when inundated. Impacts to special-status waterfowl are disclosed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). The data sources evaluated for the EIS analysis indicate that waterfowl are rarely recorded as fatalities at existing U.S. wind energy facilities, and therefore, relatively few waterfowl, geese, or swan fatalities would be expected under any action alternative.
10442-3	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Special Status Avian (Ferruginous Hawk) P. 3-86 In the DEIS it is stated, "However, for some special- status avian species, when cumulative fatalities across BCR 9 are considered, there could be negative population-level effects that continue a downward trend. Thus, even though an individual wind energy facility on its own may not cause population-level effects, each facility constructed in BCR 9 over the next 30 years would further increase avian mortalities and the potential for declines in some avian populations. Thus, when evaluating the need for adaptive management measures, it is important to consider the mortality that is likely to occur at other existing and future wind energy facilities in BCR 9." Comment: The Ferruginous Hawk is a keystone species for the arid steppe environment. This buteo is a Tier 2 Greatest Conservation Need, Type 2 BLM Sensitive Species and has a wildlife classification as Protected Nongame. According to nest survival models, the daily survival rate (DSR) of ferruginous hawk nests decreased as the number of wind turbines within the home range buffer (32 km2) increased ($\hat{\beta}$ = -0.89, SE = 0.39, 85% CI = -1.47 to -0.30). (Kolar, Patrick Shea, 2013. "Impacts of Wind Energy Development on Breeding Buteo Hawks in the Columbia Plateau Ecoregion" . Prairie Falcon Audubon members participate in the East Cascades Audubon Society Winter Raptor Survey project and sightings of wintering Ferruginous Hawks have been detected in the Hunt area as well as a significant wintering roost east of Murtaugh Lake. With climate change, there is a strong possibility of more wintering birds between the snow line and sage-steppe and agricultural fields. Prairie Falcon Audubon is encouraging a further review and study of wind development on Ferruginous Hawk reproduction. With their special status and lack of fall/winter surveys, we encourage further review of the immediate area and other potential wind energy sites before any decision is made.	The results of the Kolar (2013) study referenced in the comment were published in the *Journal of Wildlife Management* (Kolar and Bechard 2015) and are summarized in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail), which also describes special-status designations, key life history traits, and demographic information for the ferruginous hawk. This includes a description of ferruginous hawk use from the first year of avian use studies (WEST 2021a), which were conducted over the course of an entire year. The results of the second full year of avian use studies (WEST 2023) have been incorporated into the final EIS. Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 provides additional details on diurnal raptor use in the siting corridors and a summary of ferruginous hawk nests recorded during both years of raptor nest surveys (WEST 2020, 2021b); see also Table 3.3-7 and Table 3.3-8. Although ferruginous hawk use was not observed in the siting corridors during winter in the first year of avian use studies (WEST 2021a), two ferruginous hawks were recorded in winter of the second year of avian use studies (WEST 2023). The EIS also discloses the presence of a small over-wintering population of ferruginous hawks in southern Idaho based on the information in IDFG's SWAP (IDFG 2017). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." As stated in the analysis assumptions in EIS Section 3.3.2 (Avian Populations) "The analysis of effects to avian populations also assumes avian fatalities from turbine collisions would have the same magnitude of impact on avian populations in BCR 9 regardless of where those fatalities occur in BCR 9. Therefore, the project's effects on avian populations at the BCR 9 scale would be directly proportional to the estimated fatality rate for each alternative. This is an oversimplification for some species that have variations among their smaller, local populations within BCR 9. Each of these smaller populations may not have the same relative contribution to the overall size and trend of their population in BCR 9. However, quantifying the relative importance of local populations to the overall population of a species in BCR 9 is beyond the scope of this analysis. Further, data on local avian populations are not available for many species and are of limited value for species for which data are available due to the much smaller sample sizes. Where the literature indicates important differences between local populations of a species within BCR 9, additional qualitative discussion is provided in this EIS." Such a discussion is

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			provided for ferruginous hawk in EIS Section 3.3.2.1.1. Despite the small size of the ferruginous hawk population in Idaho relative to the overall population in BCR 9 and the low incidence of ferruginous hawk fatalities, the EIS takes the conservative approach of assuming that collisions with operational turbines under all of the action alternatives could have significant impacts on ferruginous hawks in BCR 9 without the implementation of avoidance and minimization measures. The ferruginous hawk analysis in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) describes a number of measures that would be implemented to minimize or avoid impacts to ferruginous hawks (see also EIS Appendix 4 [Mitigation]), including targeted curtailment if postconstruction fatality monitoring indicates such measures are warranted. In addition to the applicant-committed measures described in this section, the BLM would also require MVE to implement Tier 5 studies (as per USFWS [2012]) to further assess the potential for population-level effects if ferruginous hawk fatalities are observed following construction. This could include annual raptor nest monitoring over the life of the facility so that turbines within 1 mile of those nests can be curtailed (applicant-committed measure 158) during the nesting season (additional measure q). As stated in IAC 13.01.06 Section 300.02 "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management". A detailed evaluation of alternative sites for the project is beyond the scope of analysis in this EIS because they would not address the BLM's purpose, which is to respond to MVE's ROW grant request.
10442-4	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Special Status Avian (Long-billed Curlew) P. 3-79 In the DEIS it is stated, "Alternative B could result in more long-billed curlew fatalities than the other action alternatives because it would have the most bird fatalities overall. Although the available data suggest that few long-billed curlew fatalities would occur, few of the facilities studied are within the long-billed curlew's breeding range and, for this reason, more fatalities could occur than expected. Considering that Idaho supports as much as 31% of the long-billed curlew population in BCR 9 (American Bird Conservancy 2013) and that the species may use siting corridors during spring migration (when juveniles and subadults disperse to new territories), fatalities resulting from collision with operational turbines could adversely affect the long-billed curlew population in BCR 9. This would especially apply when the impact of numerous facilities across the landscape is considered (see Section 3.3.2.2.6 [Cumulative Impacts])." Comment: This bird is a Tier 2 Greatest Conservation Need, Type 2 BLM Sensitive Species and has a wildlife classification as Protected Nongame. Long-billed Curlews are federally protected in the U.S., Canada, and México under the Migratory Bird Treaty Act. U.S. Fish & Wildlife Service Status Assessment and Conservation Action Plan for the Long-billed Curlew describes the initial population declines were attributed to over-hunting and plowing of the native prairies for agriculture. Current threats include habitat loss and destruction due to urban development, grassland conversion for agricultural purposes, changes in the natural fire regime and the spread of exotic invasive species. Predation, grazing practices, energy development, diseases, and pesticides may also threaten Long- billed Curlew populations. Further assessment is needed in the area which would include population monitoring, breeding ground studies that identify local micro-habitat use and identification of migration areas.	As described in response to comment 10442-3 (see in Table A-3c, Birds), 2 years of avian use studies were conducted to identify seasonal and spatial variation in avian use in the siting corridors, and broader studies of avian populations, migratory behaviors, and habitat use are beyond the scope of this EIS. The description of long-billed curlew in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail) discloses the potential that long-billed curlew use in the siting corridors could be higher in particularly wet years when playas and vernal pools are inundated and describes the importance of the breeding population in western Idaho to the overall population in BCR 9, and thus, concludes that even a relatively low fatality rate from collisions with operational turbines could possibly result in a decline in the BCR 9 population. Due in part to the uncertainty in quantifying fatality rates prior to construction, these measures include postconstruction avian fatality monitoring to assess the actual long-billed curlew fatality rate and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M of MVE [2022]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." As stated in IAC 13.01.06 Section 300.02, "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management . . . "
10442-5	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Special Status Avian (Short-eared Owl) P. 3-80 In the DEIS it is stated, "Alternative B could result in more short-eared owl fatalities than the other action alternatives because it would have the most bird fatalities overall. Although short-eared owl fatalities are relatively uncommon at existing U.S. wind energy facilities, breeding males may be susceptible to turbine collisions when engaging in mating displays. Given that project raptor nest and avian use surveys were not designed to assess short-eared owl use or nesting, the species is likely underrepresented in the project survey data, and short-eared owl use and nesting in the siting corridors may be higher than the data suggest; thus, more fatalities may occur than expected. Because the short-eared owl population in BCR 9 is small and declining, the possibility that fatalities from collision with operational turbines could adversely affect their population in BCR 9 cannot be ruled out." Comment: Fragmentation of our open areas by turbines and associated access roads could have very serious consequences beyond mortality for these populations. Short-eared Owls are irruptive breeders with low site fidelity, resulting in annual shifts in local breeding densities, often tied to fluctuations in prey density. It is therefore critical to implement monitoring at a scale needed to detect regional changes in distribution that likely occur annually.	See response to comment 10442-3 (see in Table A-3c, Birds) for a description of the avian use studies conducted for the project; long-term regional studies of temporal and spatial variation in short-eared owl use are beyond the scope of this EIS. Because preconstruction surveys did not target owls, mitigation measures for short-eared owls were modified and expanded in the final EIS; these include preconstruction surveys for short-eared owl nests and avoidance buffers for active nests (see additional measure r). Additionally, MVE would complete a minimum of 2 years of postconstruction monitoring (applicant-committed measure 150 in Appendix 4) to assess the actual short-eared owl fatality rate and, if high fatality rates are observed, to determine which adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce short-eared owl fatalities. Effects to avian habitat are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1.
10442-6	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Special Status Avian (Burrowing Owl) P. 3-80 In the DEIS it is stated, "Alternative B could result in more western burrowing owl fatalities than the other action alternatives because it would have the most bird fatalities overall. Although burrowing owl fatalities are relatively uncommon at most existing U.S. wind energy facilities, very high burrowing owl fatality rates were observed at one existing wind energy facility in California where a large population of breeding owls was present. Given that project raptor nest and avian use surveys were not designed to assess burrowing owl use or nesting, the species is likely underrepresented in the survey data, and burrowing owl use and nesting in the siting corridors may be higher than the data would suggest; thus, more fatalities may occur than expected. Given this, the possibility that fatalities resulting from collision with operational turbines could adversely affect the western burrowing owl population in BCR 9 cannot be ruled out. This would especially apply when the	The description of western burrowing owl in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail) summarizes the publicly available literature on the impacts of wind energy development on the species and discloses the potential for collisions with turbines to affect the species population in BCR 9. Direct and indirect effects to avian habitat are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1, AIB-2, and AIB-3. As disclosed in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail), burrowing owl use in the siting corridors is likely to be higher than reported because avian use surveys were not designed to detect the species. Therefore, mitigation measures for burrowing owls were modified and expanded in the final EIS; these include preconstruction surveys for burrowing owl nests and avoidance buffers for active nests (additional measure q) as well

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		impact of numerous facilities across the landscape is considered (see Section 3.3.2.2.6 [Cumulative Impacts]).” Comment: The Burrowing Owl is a migratory species that can be found from Canada to Mexico. In the United States, it occupies grasslands, agricultural lands, deserts and low-rainfall areas that still support growth of perennial grasses or shrubs. However, the owl is considered an endangered species in Canada, a threatened species in Mexico and is on the U.S. Fish and Wildlife Service's list of species of conservation concern. Clint Boal, a professor in Texas Tech's Department of Natural Resources Management is concerned that the primary threat to the owl's habitat is development of land for agricultural and urban development. Part of that development in the United States is the increase in the number of wind turbine farms. But little is truly known of that impact. We request a further study of the burrowing owl within the siting corridors and how siting of the turbines could effect their habitat.	as the removal of loose rocks to avoid creating habitat for prey (additional measure s); see EIS Section 3.3.2.2.2 (Avian Populations, Alternative B with Additional Measures) and EIS Appendix 4 [Mitigation]).
10442-9	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	We strongly encourage a further review to establish metrics and mapping to include direct, indirect, and cumulative effects of renewable energy projects on habitat suitability, reproduction, and survivorship of birds. Bird mortality related to poorly sited wind energy infrastructure is growing. The annual loss of birds from wind turbines in the United States was estimated to be around 681,000 as of 2021; more than 1.4 million bird deaths are projected by 2030 or earlier if the U.S. meets its goal of producing 20 percent of electrical energy with wind. If that figure reaches 35 percent, as Department of Energy projections suggest, up to 5 million birds could be killed annually. (These estimates do not include birds that are killed by collisions with associated power lines and towers, which could be in the hundreds of thousands or even millions annually.) (American Bird Conservancy – Wind Energy)	EIS Section 3.3.2.1.2 (Avian Populations, Existing and Future Trends and Actions) describes existing and future impacts from wind energy development in the analysis area, including estimates of cumulative fatalities from existing wind energy facilities and the relative impact of other sources of avian mortality, including collisions with transmission lines. As described in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), “Because collisions with wind turbines would still result in a relatively small proportion of the fatalities from all anthropogenic structures (National Wind Coordinating Collaborative 2010), this is unlikely to significantly impact the population of most avian species in BCR 9, though it would add to the overall impact to these species. As wind energy capacity continues to increase in BCR 9, collisions with turbines will represent an increasingly large proportion of the avian fatalities resulting from collisions with humanmade structures and will have an increasingly large effect on avian populations. Although ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl would likely represent a very small proportion of all avian fatalities from collisions with turbines at any wind energy facility, even this relatively small increase in fatalities may have significant impacts on their populations in BCR 9.” As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), “The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project.”
10512-1	S. (No Last Name Provided)	The EIS is a significant miss and has several blatant errors. The lands directly in the impact area of the wind projects have major significant impacts on many species of wildlife. If a casual observer were to waltz through the project area on a hot afternoon in August it would be easy to conclude this habitat has low wildlife usage and importance to very many species/populations. This area is a critical corridor for sizable migrating waterfowl populations. When the snow melts the runoff flows into many lava depressions forming many small lakes scattered through this area providing critical staging areas for diverse waterfowl populations by the thousands.	The importance of habitat in the siting corridors for a wide variety of wildlife species is described in the Affected Environment sections for biological resources in EIS Chapter 3. Waterfowl use in the siting corridors is described in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. This section also discloses the potential for ephemeral surface water features in the siting corridors (i.e., playas and vernal pools) to provide migratory stopover habitat for waterfowl and other avian species when inundated. Impacts to special-status waterfowl are disclosed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). The data sources evaluated for the EIS analysis indicate that waterfowl are rarely recorded as fatalities at existing U.S. wind energy facilities, and therefore, relatively few waterfowl fatalities would be expected under any action alternative. The final EIS has been updated to include additional measures to minimize or avoid impacts to surface waters, including ephemeral and intermittent features, that would indirectly benefit bats and avian species (see additional measure bb).
1053-1	Susan Page	Burrowing Owls live in the open desert areas which a critical for their existence. There has already been declines due to habitat loss. A study should be conducted to review how much more of their habitat will be loss from the infrastructure planned. Will corridors inhibit their ability to traverse safely?	See EIS Section 3.3.2.2 (Avian Populations, Impacts) for a detailed analysis of the potential impacts to western burrowing owls from collisions with operational turbines. This section also describes a number of measures that would be implemented to minimize or avoid impacts to western burrowing owls (see also EIS Appendix 4 [Mitigation]). Impacts to avian habitat are disclosed in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1.
1071-4	Don Campbell	4) wind farms should not be located in or near a migratory flyway. This area is located on both a north/south and an east/west flyway. If allowed, how does the BLM and the operators propose to mitigate and pay for losses of wildlife? What value is the BLM and federal government assinging to each of these animals/birds/eagles??	As described in EIS Section 3.3.2.1 (Avian Populations, Affected Environment), migratory movements in Idaho are primarily east to west and concentrated along the Snake River, Salmon River, and Pend Oreille River corridors. EIS Appendix 4 (Mitigation) describes mitigation measures, adaptive management measures, and potential compensatory mitigation measures.
11327-9	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	Wind Development – Negative Impacts to Golden Eagles and Ferruginous Hawks Deaths from wind development activities would be considered unlawful take under relevant federal laws, specifically the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. There is increasing concern for both species due to current and future projections of mortality risk from anthropogenic sources, such as industrial scale wind development. Both species are believed to be declining.29 Numerous studies have documented these species' vulnerability to mortality from wind turbine collisions and localized population-level impacts. Squires et al. (2020) examined these two species in Wyoming and found that both are at risk from future habitat fragmentation30. In 2016, both species were identified as being at equally high risk of experiencing population declines from wind energy in the United States31. In a 2021 peer-reviewed publication by Diffendorfer et al., 14 raptor species were examined for level of vulnerability to current and anticipated installed wind capacity and in greatest need of management attention32. Golden Eagles and Ferruginous Hawks were among the top four species with the highest turbine- caused mortality rates. These two species were also among the top five species that showed larger estimated declines in population rate of change with increased levels of wind energy, thus had high potential for population-level impacts from wind turbine collisions. Additionally, Conkling et al. (2022) found that Golden Eagles were among the avian species found to be vulnerable to population-level effects from added fatalities caused by renewables and other sources33. In a publication that is under peer-review, long-time avian biologist and researcher Jim Watson notes that wind projects appear to expedite	Both the ferruginous hawk and the golden eagle are analyzed in detail in the EIS due to the potential for collisions with operational turbines to affect their populations in the analysis area; see EIS Section 3.3.2 (Avian Populations) and EIS Section 3.3.3 (Eagles), respectively. Impacts to avian habitat are disclosed in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), “Although turbine collisions are not considered to be a threat to the populations of most avian species (AWWI 2016; Choi et al. 2020), most avian species are afforded protection under the MBTA. The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential for population-level effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities.”

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		changes in raptor guild structure, facilitating long- term, significant declines in local breeding populations of Ferruginous Hawks and Golden Eagles, in part due to subsidizing human-tolerant and detrimental species (ravens and great- horned owls). In our opinion, such effects – when applied to the proposed Lava Ridge Wind Project – could result in changes in guild structure and increase predation pressure likely to impact Golden Eagles at the local area population (LAP) scale.34 Conkling et al. (2022) also found that vulnerability varied by species and by taxonomic group. Most raptors also were vulnerable to increases in absolute numbers of fatalities, which is of concern as wind development interests increase in Idaho and across the West. Conkling et al. (2022) and others, as described in further detail below, further find that localized fatalities lead to broader continental-scale population impacts. In the closing paragraph of their publication, Diffendorfer et al. (2021) specified that their research highlighted "the conservation value of ongoing efforts to continue developing collision deterrent technologies (Mayet al. 2020, Stokke et al. 2020), to implement automated shutdowns when raptors are in close proximity to wind turbines (Tom´e et al. 2017, Hayes et al. 2019), and to site new turbines in locations that avoid raptors (de Lucas et al. 2012a, b, Hanssen et al. 2020." (Emphasis added). It is with this strong guidance that we frame our comments. Thus, with the strength of the arguments presented in this comment letter, adequate protections are necessary to ensure that renewable energy projects continue in a sustainable manner, especially not compromising the preservation standard required by U.S. Fish and Wildlife Service for Golden Eagles.	MVE is pursuing an ITP, which is being evaluated in a separate NEPA analysis being conducted by the USFWS (see Section 3.3.3 [Eagles]). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." A number of additional mitigation measures would be implemented throughout the life of the project to further minimize or avoid impacts to ferruginous hawk, golden eagle, and other avian species; these include additional raptor nest surveys and avoidance buffers for active nests, and a minimum of 2 years of postconstruction fatality monitoring (applicant-committed measure 150 in EIS Appendix 4) to assess actual avian fatality rates and to determine whether Tier 5 studies (additional measure x) and adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce fatalities. These adaptive management measures include the use of detector-based curtailment systems (applicant-committed measure 158) and additional fatality monitoring would be required to assess the effectiveness of adaptive management measures. The USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines. Cumulative effects from turbine collisions at other existing and planned wind energy facilities in the analysis areas and other sources of mortality are discussed in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts) and EIS Section 3.3.3.2.7 (Eagles, Cumulative Impacts). Painting the base of turbines or one turbine blade black, as recommended by May et al. (2020) and Stokke et al. (2020), is not possible due to FAA regulations (see EIS Section 2.9.5 [Alternative Components]). Stokke, B.; T. Nygård, U. Falkdalen, H. Pedersen, and R. May. 2020. Effect of tower base painting on willow ptarmigan collision rates with wind turbines. *Ecology and Evolution* 10(12):1–10. Available at: https://doi.org/10.1002/ece3.6307. Accessed December 19, 2023.
11327-15	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	c) Inadequate Analysis of Impacts to Ferruginous Hawks In Idaho, there are around 600 breeding individuals. The Ferruginous Hawk is threatened primarily by conversion of native grasslands into cultivated fields. According to the Idaho Fish and Game Department, almost 50% of Ferruginous Hawk habitat in southern Idaho has been lost, and local biologists are noticing a decrease in their numers.52 Ferruginous Hawks were among four "large bird species" (other than eagles) that were determined to be at risk, in the analyses presented in the DEIS, of population-level effect as a result of this project. The DEIS further states that Ferruginous Hawks are particularly sensitive to increased mortality and references the research of Beston et al (2016), who found that found that turbines have a relatively large contribution to overall mortality for this species, and that they are vulnerable to population-level effects from wind energy development. The document further notes that while the hawks would benefit from lont-term nest surveys and curtailment of turbines within 1 mile of their nests, mortality from collisions with turbines would still occur. Additionally, turbines may indirectly impact ferruginous hawk populations (through habitat loss or alteration and reduced habitat quality) by leading to reduced nest success and increased predation and starvation of juveniles. However, the DEIS fails to provide any mortality estimates beyond the group of all raptors together. The DEIS notes that "Alternative B could results in 156 to 607 raptor fatalities", but fails to break this down by species. Thus, BLM must provide an improved analysis of the impacts that this proposed wind farm, and the existing/proposed development, could have on this species of conservation concern. Analysis should include mortality/take estimates. Mortality and survival rates of adult raptors exert the strongest influence on direction and rate of population change relative to other population parameters53. Thus, meaningful measures should be taken to avoid and minimize mortality for these long-lived species. We do applaud Applicant-Committted Measure Number 157, which specifies that if Ferruginous Hawk fatalities are observed, MVE "would implement Tier 5 studies (as per the WEG [USFWS 2012]) to further assess the potential for population-level effects following construction. This could include annual raptor nest monitoring over the life of the facility so that turbines within 1 mile of those nests can be curtailed (applicant-committed measure 158) during the nesting season.	As described in the analysis assumptions in EIS Section 3.3.2 (Avian Populations), "Although the avian use surveys (WEST 2021a, 2023) were used to determine the species that may be present in the siting corridors and their seasons of use, the risk of fatalities from turbine collisions varies among species due to factors such as flight characteristics, type of prey, and habitat use. Thus, avian use observed prior to construction may not correlate directly to fatality rates after construction (WEST 2011)." The fatality rates presented in Table 3.3-12 are not intended to be precise estimates, they are presented to illustrate how generation capacity effects avian fatalities to allow for a reasoned choice among alternatives. Any attempt to further quantify the potential fatality rate for individual species such as the ferruginous hawk would be highly speculative and would not lead to a more informed decision. While ferruginous hawk use observed during the avian use studies accounted for a relatively small proportion of overall diurnal raptor and large bird use and ferruginous hawk fatalities are rarely recorded at existing U.S. wind energy facilities, the EIS describes evidence from the publicly available literature that ferruginous hawk populations may be susceptible to mortality from collisions with operational turbines as wind energy development continues to expand further west. This uncertainty in potential fatality rates was an important factor in the development of mitigation measures for the ferruginous hawk and other avian species, including additional measure q referenced in the comment (which is additional measure x in the final EIS).
11419-1	Joyce Flick	Lava Ridge and Salmon Falls wind projects do not take into consideration the effects it will have on wild life and birds. Lava Ridge is in the direct path of hundreds of seagulls and pelicans that fly twice a day, through the future path of the turbines, from the Snake River to the lakes and reservoirs to the north. They fly south in the A.M. and north in the P.M. They are just two species of birds that share this flight path. Hundreds will be killed if these projects are approved.	See Table App3-3 in EIS Appendix 3 for a description of potential impacts to gulls and pelicans.
11514-1	Judy Ruprecht	Without a comprehensive scientific plan, there can be many unknown and negative impacts on birds and other wildlife including bats, ferruginous hawks, long-billed curlews, short eared owls, burrowing owls, bald and golden eagles, greater sage grouse and many songbirds. Bird mortality related to poorly sited wind energy infrastructure is growing. The annual loss of birds from wind turbines in the United States was estimated to be around 681,000 as of 2021; more than 1.4 million bird deaths are projected by 2030 or earlier if the U.S. meets its goal of producing 20% of electrical energy with wind. If that figure reaches 35%, as Department of Energy projections suggest, up to 5 million birds could be killed annually. (These estimates do not include birds that are killed by collisions with associated power lines and towers, which could be in the hundreds of thousands or even millions annually.) (American Bird Conservancy--Wind Energy)	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "Although turbine collisions are not considered to be a threat to the populations of most avian species (AWWI 2016; Choi et al. 2020), most avian species are afforded protection under the MBTA. The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M of MVE [2023]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring

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			surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential for population-level effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." EIS Section 3.3.2.1.2 (Avian Populations, Existing and Future Trends and Actions) describes existing and future impacts from wind energy development in the analysis area, including estimates of cumulative fatalities from existing wind energy facilities and the relative impact of other sources of avian mortality, including collisions with transmission lines. As described in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), "Because collisions with wind turbines would still result in a relatively small proportion of the fatalities from all anthropogenic structures (National Wind Coordinating Collaborative 2010), this is unlikely to significantly impact the population of most avian species in BCR 9, though it would add to the overall impact to these species. As wind energy capacity continues to increase in BCR 9, collisions with turbines will represent an increasingly large proportion of the avian fatalities resulting from collisions with humanmade structures and will have an increasingly large effect on avian populations. Although ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl would likely represent a very small proportion of all avian fatalities from collisions with turbines at any wind energy facility, even this relatively small increase in fatalities may have significant impacts on their populations in BCR 9." As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project."
11523-2	Janice Simpkin	o As a volunteer for East Cascade Audubon, I have been conducting winter raptor surveys southwest of the proposed windfarm site(s) for about 10 years so I am quite familiar with the bird species in the area. It appears to provide good wintering habitat for several raptors in addition to the species already mentioned. For example, Rough-legged Hawks are common November-February, and I saw a Snowy Owl once. Even though these aren't breeding birds in this area, their winter habitat should be considered.	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, including seasonal variation in diurnal raptor use. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and EIS Table 3.3-7. Detailed data from the first year of avian use studies are presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study was included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. The results of both years of raptor nest surveys were also summarized in this section (see also Table 3.3-10). Rough-legged hawk use in the siting corridors is described in the avian use survey reports (WEST 2021a; 2023), which showed that the species is the second most common diurnal raptor during the spring and fall but is generally absent during the winter and summer. However, many of the sources evaluated in the analysis of impacts to ferruginous hawks and other diurnal raptors (see EIS Section 3.3.2.2 [Avian Populations, Impacts]) also included discussion of potential impacts to rough-legged hawks. These studies demonstrated that rough-legged hawks are not as strongly affected by wind energy development as other diurnal raptors. Rough-legged hawks are not a special-status species, which is indicative of their relatively large and stable populations. Therefore, it is reasonable to conclude that rough-legged hawks have a low potential to experience population-level impacts from fatalities due to collisions with operational wind turbines. Therefore, the species does not meet the criteria for analysis in Section 3.3.2 (Avian Populations) or Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). The snowy owl was not included in Table App3-3 because of the lack of confirmed records within the siting corridors and immediate vicinity and because it does not carry a special-status designation in Idaho. Impacts to avian habitat are described in EIS Table App3-1 in EIS Appendix 3; see AIB-1.
11533-5	Rebecca Loomis	Not only will this wind farm destroy the terrain and impact animal life that live in the proposed areas but no one has done a thorough analysis on the negative impact on the massive number of birds to include endangered species that these wind turbines have on them.	Impacts to avian populations are disclosed in EIS Section 3.3.2 (Avian Populations). There are no ESA listed bird species that occur in the siting corridors (see Table App3-3 in EIS Appendix 3 [Issues Analyzed in Brief]).
11534-15	Matt Arnold, William Eubanks	The Analysis of Project Effects on Raptors Fails to Address Important BLM-Managed Habitat Located Adjacent to and Within the Project Area Section 3.3.2 of the DEIS evaluates the Project's effects on avian species, including raptors. These birds, which include hawks, eagles, owls, and falcons, are particularly susceptible to wind turbine mortality due to several factors, including behavior and the age structure of their populations. See Richard T. Watson et al., Raptor Interactions with Wind Energy: Case Studies from Around the World, 52 J. RAPTOR RES. 1, 2, 11 (2018) ("Wind-energy developments can be detrimental to birds of prey. Even low numbers of anthropogenic fatalities of certain species, especially raptors, can be additive with other causes of mortality and significant to their populations.").13 Idaho, in particular, contains a wealth of raptor species—31 in total (17 species of diurnal raptors (hawks, eagles, and falcons) and 14 species of nocturnal raptors (owls)). In fact, the state is home to the Morley Nelson Snake River Birds of Prey National Conservation Area ("NCA"), which, as BLM knows, "is home to the greatest concentration of nesting birds of prey in North America—and perhaps, the world." BLM, Morley Nelson Snake River Birds of Prey National Conservation Area Visitor Guide at 7 (2012), https://on.doi.gov/404HPLw; see also Act of Aug. 4, 1993, Pub. L. No. 103-64, § 1 (finding that "[t]he public lands managed by the Bureau of Land Management in the State of Idaho within the Snake River Birds of Prey Area contain one of the densest known nesting populations of eagles, falcons, owls, hawks, and other birds of prey (raptors) in North America"). The Project's proposed location is less than 90 miles East-Southeast of the Morley Nelson NCA—i.e., a nominal distance for far-ranging raptor species—along the major migration corridor in Idaho. See DEIS at 3-61 ("Migratory movements within Idaho are primarily east to west and concentrated along the Snake River."). Like most birds, raptors include "highly mobile species that migrate long	While small buttes, rock outcroppings, and other topographic features are present in the siting corridors, none of these features are large or consistent enough to be of significant importance to migrating raptors. Raptor use in the siting corridors was evaluated over 2 years of avian use and raptor nest studies, which are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. Temporal variation in raptor use indicates that some of these species migrate through the siting corridors, but the relatively low numbers of raptors observed would suggest that the siting corridors are not within an important migratory corridor for raptors. High raptor use at Morley Nelson Snake River Birds of Prey National Conservation Area is related to the presence of important habitat features such as large, steep cliffs that provide nesting habitat for raptors and create thermals used by migrating raptors. Unique soil and vegetation at this location also provides abundant habitat for important raptor prey resources such as ground squirrels and jackrabbits, as described in the visitor guide referenced in the comment. A brief description of the NCA has been added to EIS Section 3.3.2.1 (Avian Populations, Affected Environment). According to the American Bird Conservancy Wind Risk Assessment Map referenced in the comment, only the Alternative B siting corridors overlap with key habitat area for the greater sage-grouse; the siting corridors fall entirely with the bald eagle key habitat area. The greater sage-grouse is discussed in EIS Section 3.3.4 (Greater Sage-Grouse), which demonstrates the substantial considerations given to the species in the siting of the facility, the development of the action alternatives, and the identification of measures necessary to minimize or avoid impacts to the species. The key habitat area for bald eagle shown in Wind Risk Assessment Map spans a huge swath of North America and lacks the detail necessary to draw any meaningful conclusions as to the importance of habitat in the siting corridors for this

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		distances," DEIS at 3-86, and many cover large areas in flight when searching for prey. But the DEIS fails to include any mention of the Morley Nelson NCA, what impacts the Project may have on its nationally significant abundance, especially when paired with the rapid rise of wind energy in this part of the state. In fact, the DEIS paints a very different (and arguably misleading) picture about the area's importance for raptors and other birds. According to the DEIS, "[t]here are no Important Bird Areas designated in the siting corridors, and with the exception of limited permanent water resources (namely canals), the siting corridors do not contain habitats that would concentrate migrating birds or mountain ridges that would provide updrafts for migrating raptors. DEIS at 3- 61. Elsewhere, however, the DEIS explains that the "[w]ind turbine siting corridors would be concentrated in the higher elevation lands associated with several buttes in the area, and on mid- elevation lands between the buttes." Id. at 2-2; see also id. at 3-62 ("The shrublands, rangelands, agricultural areas, and rocky outcrops in the siting corridors provide habitat, nesting and foraging areas, and migratory stopover areas for a variety of raptors and other migratory bird species."). Further, BLM's assessment about the Project-area's value to raptors is undermined by findings compiled by the American Bird Conservancy, which shows that this area is an "Area of High Importance" ("Key Habitat Area"), within which some wind development may be possible if key habitats "are avoided, and/or appropriate minimization and mitigation measures are incorporated." Wind Risk Assessment Map, AM. BIRD CONSERV., https://bit.ly/3GAU1gf (last visited Apr. 20, 2023).14	species. As noted in the description for this key habitat area, bald eagles are rarely detected away from large bodies of water, which are not present in the siting corridors. EIS Section 3.3.3.1 (Eagles, Affected Environment) also describes the general lack of habitat for bald eagles in the siting corridors and summarizes the results of both years of avian use (WEST 2021a, 2023) and raptor nest surveys (WEST 2020, 2021b), which indicate very low bald eagle use and no bald eagle nesting in the siting corridors. The Wind Risk Assessment Map also shows that the siting corridors are located outside of the intermountain raptor migration corridor, which supports the conclusion that raptor migratory movements are concentrated in the immediate vicinity of the Snake River, south of the siting corridors. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). A number of additional mitigation measures would be implemented throughout the life of the project to further minimize or avoid impacts to raptors, golden eagle, and other avian species; these include additional raptor nest surveys and avoidance buffers for active nests, and a minimum of 2 years of postconstruction fatality monitoring (applicant-committed measure 150 in EIS Appendix 4 [Mitigation]) to assess actual avian fatality rates and to determine whether Tier 5 studies (additional measure x) and adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce fatalities; additional fatality monitoring would be required to assess the effectiveness of adaptive management measures. The USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines.
11535-29	Steven Andersen	The DEIS grossly underestimates the fatality rate of avian populations (both local and general). "There are no previous studies of wind energy facility [sic] of the size proposed, nor have there been any studies of facilities with turbines as large as those proposed for the Lava Ridge Wind Project, and it is unknown how these differences would affect avian fatalities during operation."107 "[D]ata on local avian populations are [sic] not available for many species and are of limited value for species for which data are available due to the much smaller sample sizes." 108 The DEIS could not be any clearer: it did not conduct a sufficient analysis of potential impacts based on the magnitude of the project. This 34-year proposed project has not been sufficiently supported by substantial research and surveys regarding impact to avian population. The magnitude of the project alone, acknowledged in the DEIS, requires significant more time and resources to determine what impact the project will have. Statements such as, "it is unknown" how the magnitude of the proposed project will affect avian populations is concerning, and is certainly evidence that the project should not move forward at this time.	Although the avian use surveys (WEST 2021a, 2023) were used to determine the species that may be present in the siting corridors and their seasons of use, the risk of fatalities from turbine collisions varies among species due to factors such as flight characteristics, type of prey, and habitat use. Thus, avian use observed prior to construction may not correlate directly to fatality rates after construction (WEST 2011). The fatality rates presented in Table 3.3-12 are not intended to be precise estimates, they are presented to illustrate how generation capacity effects avian fatalities to allow for a reasoned choice among alternatives. 40 CFR 1502.21 requires the BLM to disclose where there is incomplete or unavailable information when evaluating reasonably foreseeable significant adverse impacts; therefore, the EIS must describe the uncertainties involved in estimating bird fatality rates and the incomplete nature of the publicly available information on the response of avian populations to wind energy development. Despite these difficulties in quantifying impacts to avian populations, the EIS recognizes the potential for the action alternatives to adversely impact the BCR 9 populations of ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl without the implementation of mitigation measures. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-based Wind Energy Guidelines* (USFWS 2012).
11535-30	Steven Andersen	Mortality from wind energy could lead to localized population-level impacts, which the DEIS expressly acknowledged it did not consider. Again, the DEIS states, "data on local avian populations are [sic] not available for many species and are of limited value for species for which data are available due to the much smaller sample sizes."118 The cumulative result of wind energy with other anthropogenic sources of mortality may cause widespread declines in avian populations.119 All of these impacts require more consistent and rigorous monitoring. Obtaining, synthesizing, and communicating reliable information on mortality rates under different scenarios (e.g., geographical location, climate, topography, presence of species of conservation concern, etc.) is fundamental to identifying creative engineering and environmental solutions to minimize mortality.120 However, the literature reveals persistent concerns regarding the inconsistency, poor rigor, and lack of transparency of mortality studies at wind facilities worldwide.121 This is especially true in the DEIS which openly admits the impact is "unknown."	As stated in EIS Section 3.3.2 (Avian Populations), "The analysis area for avian populations is Bird Conservation Region (BCR) 9 (Figure 3.3-3), which is an ecologically distinct region with similar bird communities, habitats, and resource management issues (North American Bird Conservation Initiative 2021). BCRs provide an ecological approach to capturing regional variation in bird occupancy and useful spatial units over which to examine changes in population. Data on avian fatality rates and installed wind capacity are also available at the BCR level, which allows for a more informed estimation of the avian fatality rates that could be expected under the action alternatives, and the relative contribution of those fatalities to the overall impact on regional avian populations." and "the project's effects on avian populations at the BCR 9 scale would be directly proportional to the estimated fatality rate for each alternative. This is an oversimplification for some species that have variations among their smaller, local populations within BCR 9. Each of these smaller populations may not have the same relative contribution to the overall size and trend of their population in BCR 9. However, quantifying the relative importance of local populations to the overall population of a species in BCR 9 is beyond the scope of this analysis. Further, data on local avian populations are not available for many species and are of limited value for species for which data are available due to the much smaller sample sizes. Where the literature indicates important differences between local populations of a species within BCR 9, additional qualitative discussion is provided in this EIS."
11535-32	Steven Andersen	The purported data used from "BCR 9" is largely insufficient based on the DEIS admissions as to lack of research and analysis. More specifically, the analysis area is BCR 9, which runs from Canada to southern Nevada, and from the Cascade Mountains to the west slope of the Rocky Mountains. All of southern Idaho is included in BCR 9. Therefore, the area is absurdly large for use in estimating fatalities. BCR 9 certainly consists of vast differences in topography, geography, and general unique characteristics, which all play a major role in how mortality rates are determined. The improperly concludes, despite the express acknowledgment to the contrary, that the gigantic area that is BCR 9 is somehow useful for estimating avian fatalities for the subject project because it would be similar to wind factories in other parts of BCR 9. It is perplexing the DEIS jumps to this conclusion in the face of its statement that "[t]here are no previous studies of a wind facility [sic] of the size proposed,"124 but in any event, it is undisputed there are no wind farms or projects in BCR 9 that come close to the size in acreage or number and height of turbines.	See response to comment 11535-30 (see in Table A-3c, Birds) for the analysis area rationale. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), avian fatality rates for the USFWS Pacific Region and EPA North American Deserts Level I Ecoregion are similar to those reported for BCR 9. Therefore, the avian fatality estimates would be similar regardless of the spatial scale selected. Since the estimated fatality rates for each action alternative are directly proportional to generation capacity, the relative impact of each alternative is the same regardless of the fatality rate used for the estimate. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "available data from existing wind farms . . . had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the Lava Ridge Wind Project." Although there are no existing U.S. wind energy facilities of the size proposed, the use of per-MW fatality rates is well established in the publicly available literature and allows for the fatality rates observed at existing facilities to be scaled up to the size proposed. The EIS discloses the uncertainty involved in this approach and the need for

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			postconstruction monitoring to better quantify fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as described in the response to comment 11535-29 (see in Table A-3c, Birds). EIS Section 3.3.2.2.2 has been updated with additional postconstruction fatality monitoring data obtained from IDFG subsequent to the publication of the draft EIS; these studies showed that overall avian fatality rates at wind energy facilities Idaho are generally well below the regional mean (2.7 birds per MW per year) used in the avian fatality estimates presented in Table 3.3-12, despite the fact that all of the facilities for which IDFG provided data were located adjacent to large reservoirs, the Snake River, and other riparian areas and surface water. None of the studies could establish an estimated raptor fatality rate because too few carcasses (< 5) were found. Considering the project is much further from significant riparian habitat, large surface waters, and rocky cliff habitat present in the vicinity of other facilities studied in Idaho, it is possible that the fatality rates observed at the project would be well below the mean estimate and fatality rates exceeding the maximum estimates presented in Table 3.3-12 would be highly unlikely.
11535-33	Steven Andersen	Even more, the DEIS states, "[t]he analysis of effects to avian populations also assumes avian fatalities from turbine collisions would have the same magnitude of impact on avian populations in BCR 9 regardless of where those fatalities occur in BCR 9." This, of course, is intentionally misleading based on the fact that the location and circumstances of fatalities absolutely matter. The potential effect to local avian populations is more strongly influenced by their local population size, than by continental population size.126 The BCR 9 data therefore overgeneralizes and underestimates the local impact.	The EIS examines both continental and regional (BCR-level) population data. As stated in Section 3.3.2, "The analysis of effects to avian populations also assumes avian fatalities from turbine collisions would have the same magnitude of impact on avian populations in BCR 9 regardless of where those fatalities occur in BCR 9. Therefore, the project's effects on avian populations at the BCR 9 scale would be directly proportional to the estimated fatality rate for each alternative. This is an oversimplification for some species that have variations among their smaller, local populations within BCR 9. Each of these smaller populations may not have the same relative contribution to the overall size and trend of their population in BCR 9. However, quantifying the relative importance of local populations to the overall population of a species in BCR 9 is beyond the scope of this analysis. Further, data on local avian populations are not available for many species and are of limited value for species for which data are available due to the much smaller sample sizes. Where the literature indicates important differences between local populations of a species within BCR 9, additional qualitative discussion is provided in this EIS."
11535-34	Steven Andersen	The DEIS understates the negative irreparable impact the project will have on the avian population habitat. As the DEIS acknowledges, the siting corridor is used for "breeding, nesting, foraging, hunting, roosting, and sheltering. The shrublands, rangelands, agricultural areas, and rocky outcrops in the siting corridors provide habitat, nesting and foraging areas, and migratory stopover areas for a variety of raptors and other migratory bird species."127 The DEIS recorded a total of 72 species during surveys (surveys which are substantially inadequate in time-spent).128 The impact to such a vast number of avian species cannot be so easily overlooked as the DEIS has done, nor can the surveys and research be so scant as they have been. The most important type of impact is likely indirect, which the DEIS fails to adequately consider. Habitat loss is the leading cause of species extinction and other negative impacts on biodiversity but has received relatively little attention in the energy development literature.129 Wind energy requires almost twice the footprint of oil and gas per unit energy produced, and given the unprecedented magnitude of this project, it is likely to be even more, which means the habitat loss will be exacerbated. 130 More specifically, wind may require less infrastructure, but it results in higher levels of habitat fragmentation because impacts are geographically scattered rather than concentrated.131 Of note, in the U.S., the Federal Endangered Species Act currently protects over 1300 species and another, 250 species are under consideration for protection.132 The majority of these species list habitat loss and fragmentation as the primary cause for federal protected status. For these and other species that require large unfragmented habitat, improperly sited wind turbines may be incompatible with maintaining viable wild populations.134 The DEIS does not even consider which of the avian species requires a large unfragmented habitat in order to properly determine where the locate the turbines. If birds avoid the immediate vicinity of the project, the area may lose its attraction to birds on a long-term basis.135 Further, construction of a wind power facility means increased human activity in the area during and after the construction phase, and the disturbance caused by this may be significant.136 Such disturbance effects would appear during the early construction and continue with varying intensity during the project's lifetime.	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, including seasonal variation in diurnal raptor use. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and in EIS Table 3.3-7. Detailed data from the first year of avian use studies is presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. The results of both years of raptor nest surveys were also summarized in this section (see also Table 3.3-10). Additional studies were conducted for greater sage-grouse, as summarized in EIS Section 3.3.4.1 (Greater Sage-Grouse). As described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief; see AIB-1), with the implementation of avoidance, minimization, and mitigation measures, effects to avian habitat would be the same as disclosed in BLM (2005:5-35 to 5-85).
11535-35	Steven Andersen	The DEIS fails to give due consideration to various aspects of habitat loss. For example, habitat loss from roads is substantial, often accounting for the largest proportion of land-use change.138 However, the only thing the DEIS does is provide an estimate of the total mileage of proposed roads, but fails to indicate how the differences in proposed mileage will impact the habitat of the avian population.	Disturbance from road construction and improvements is accounted for in the acreage of infrastructure for each action alternative as shown in Table 2.4-1 in EIS Section 2.4 (Alternative B). As described in the response to comment 11535-34 (see in Table A-3c, Birds), impacts to avian habitat are addressed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1.
11535-36	Steven Andersen	Further, noise and light pollution has a significant impact on habitat of avian population, but the DEIS only briefly (if at all) addresses this aspect of indirect impact. More specifically, noise and light pollution are widely acknowledged as sources of disturbance to avian species, contributing to habitat degradation and wildlife displacement, and masking auditory and visual life-history traits essential for survival and reproduction.	See response to comment 11535-34 (see in Table A-3c, Birds). Additional discussion of indirect effects to avian species is provided in AIB-2 through AIB-4.
11535-37	Steven Andersen	Finally, the DEIS has not sufficiently considered a large portion of the proposed siting corridor (let alone the specific location of the turbines because that has not yet been selected). Specifically, the DEIS admits that it has not covered "30% of the project area."140 Further, it appears surveys that took place only once per month for one year (second year unavailable, but presumably just as insufficient). Such a small sample size over a such a short period of time, given the magnitude of the project, is inadequate. This is even more true in light of the fact that certain avian populations are known to move their nests significantly over time.	Both years of avian use studies were conducted in accordance with standard survey methodology and the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). Due to changes in the siting corridors after the first year of avian use studies, that year of study does not provide the recommended 30% coverage but is acceptable for use in the EIS analysis because the point count locations that fall outside the current siting corridors are within a few miles of the siting corridors in similar habitats, as disclosed in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9.
11547-2	Lowell Ihler, Carol Ihler	2. The loss of wildlife, animals, birds and bats is a major concern. Again, we don't feel that this was fully addressed in the DEIS. The portions that were addressed shows how many birds, bats and wildlife could be damaged or lost due to this project. We have the World Center for Birds of Prey located in Idaho that has made a huge difference in the survival of many bird species including the eagles and falcons. If anyone shoots or kills one of the protected birds	See response to comment 11534-15 (see in Table A-3c, Birds) for a discussion of the Morley Nelson Snake River Birds of Prey National Conservation Area and impacts to raptors. The MBTA and BGEPA prohibit the intentional take of migratory birds and eagles but do not impose the same level of restrictions for incidental take of these species resulting from otherwise lawful actions. MVE is pursuing an ITP, which is being evaluated in a separate NEPA

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		they are fined and punished. Why can a big corporation come in and have the "right" to kill these birds with a "take Permit" and only pay a fine for any over the allotted "take permit"? This is just a way of buying there way out and no amount of money can replace these birds and other wildlife.	analysis being conducted by the USFWS (see EIS Section 3.3.3 [Eagles]). The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." As stated in IAC 13.01.06 Section 300.02 "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management . . . "
11554-18	Raul Labrador; Idaho Attorney General's Office	Beyond wild game, the Project will devastate many other vulnerable animal populations in Idaho. The hundreds of sweeping blades slicing through the air, for example, are known to pulverize bat and bird populations.2 Increased mortality from wind farms has even pushed some bat species to the point of extinction.3 These devastating impacts will affect the rest of Idaho's ecosystem. Bats maintain an equilibrium in the insect population and ensure that insects don't overwhelm local crop output. And a reduction in the predatory bird population will lead to a corresponding increase in rodents that harm crops. The draft EIS proposes no adequate alternative to harmful effects on Idaho's wildlife. While the draft EIS generally acknowledges the Project will harm Idaho wildlife, it still suggests preferred proposed alternatives that will cause "irreversible" damage to Idaho wildlife. Importantly, the Idaho Department of Fish and Game designates several bat species as "species of greatest conservation need" (SGCNs).4 The agency knows that the Project will very likely have a "population-level" effect on several of these SGCN bat species, but it disregards those consequences. DEIS 3-37, 3-41–42. Similarly, Idaho has designated several birds as SCGNs that the agency also recognizes will be severely and "irretrievably" harmed by the Project. See, e.g., DEIS at 3-126 (all action alternatives will have irretrievable harm on sage grouse); id. 3-68, 3-78 (ferruginous hawks are "vulnerable to population-level effects from wind energy development). As trustee over its wildlife, Idaho has a special interest in preserving these populations. The draft EIS's failure to account for, or even mention, Idaho's interest in SGCNs is a clear violation of federal law.	See EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) for the definition of irreversible and irretrievable commitments, which are related to the duration of the impact rather than the severity or magnitude. Special-status avian and bat species, including those designated as SGCNs by IDFG, were individually assessed for their potential to experience population-level impacts from the action alternatives, as described in EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment) and Section 3.3.2.1 (Avian Populations, Affected Environment). Those species with a moderate to high potential for population-level impacts are analyzed in detail in Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts) and Section 3.3.2.2 (Avian Populations, Impacts). Species at low risk of population-level impacts are analyzed in Table App3-2 and App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Due to the potential for significant impacts to special-status avian bat species, and number of avoidance, minimization, and mitigation measures would be implemented as described in the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation). As described in EIS Section 3.3.1.3 (Bat Populations and Roosting Habitats, Irreversible and Irretrievable Commitments and Short-term Uses Versus Long-Term Productivity) and Section 3.3.2.3 (Avian Populations, Irreversible and Irretrievable Commitments and Short-term Uses Versus Long-Term Productivity), irretrievable impacts to birds and bats would not be considered irreversible because they would be unlikely to result in a trend toward listing under the ESA or a loss of population viability. Table App3-4 was added to EIS Appendix 3 to provide the rationale for excluding other special-status species, including those designated as SGCNs by IDFG, from detailed analysis in the EIS.
11598-16	Idaho Conservation League	Birds ICL appreciates that wind projects have a smaller impact on avian mortality compared to many other anthropogenic effects and other forms of energy: Despite the trend toward increasing avian fatalities from wind energy, this source of mortality will remain relatively small when compared to other sources of avian mortality—such as collisions with vehicles, buildings, transmission lines, and communication towers; exposure to pesticides and other toxic chemicals; and predation by domestic and feral cats (AWWI 2016; Loss 2016; National Wind Coordinating Collaborative 2010)—and for most species, this source of mortality will be too small to have a notable effect on their populations (AWWI 2016; Choi et al. 2020). However, for some special status avian species, when cumulative fatalities across BCR 9 (Bird Conservation Region) are considered, there could be negative population-level effects that continue a downward trend. (DEIS 3-86). and It is also important to note that wind energy results in an estimated 0.269 avian fatality per gigawatt-hour (GWh) of energy produced, whereas nuclear power causes an estimated 0.416 avian fatality per GWh, and traditional fossil fuel energy causes 5.18 avian fatalities per GWh (Sovacool 2013). (DEIS 3-87). However, ICL is concerned about the lack of studies cited on the effects on avian mortality from projects of this size: There are no previous studies of a wind energy facility of the size proposed, nor have there been any studies of facilities with turbines as large as those proposed for the Lava Ridge Wind Project, and it is unknown how these differences would affect avian fatalities during operation. (DEIS 3-58). In addition, there may be declines in certain localized avian populations. 9 Idaho Department of Fish and Game, DRAFT State WIldlife Action Plan (2022). However, for some special status avian species, when cumulative fatalities across BCR 9 are considered, there could be negative population-level effects that continue a downward trend. Thus, even though an individual wind energy facility on its own may not cause population-level effects, each facility constructed in BCR 9 over the next 30 years would further increase avian mortalities and the potential for declines in some avian populations. (DEIS 3-86). The Lava Ridge project, located within Bird Conservation Region 9 includes over 70 bird species, representing a wide variety of life history characteristics. Among them the horned lark, western meadowlark and Brewer's sparrow are the predominant small/pasturing bird species. Large birds such as common ravens and waterfowl are also present, as well as many special-status birds that are Species of Greatest Conservation Need (SGCN) or BLM special-status species10 such as owls, buteos and eagles. Many protected birds in BCR 9, such as the ferruginous hawk are associated with low reproductive outputs and have been identified as having moderate risk of population-level effects from turbine mortality events. These significant risks will increase to breeding adults, fledglings and nesting success as more wind developments are constructed within ferruginous hawk habitat. (DEIS 3-68). The long-billed curlew is also a species with a low reproductive rate. While some populations in Idaho have apparently been increasing, rangewide declines indicate that current breeding success and localized distribution in BCR 9 needs to be preserved. Two SGCN owl species (short-eared and burrowing) have also been characterized in the DEIS (3-70) as being sensitive enough such that only small reductions in productivity could compromise populations in BCR 9. The DEIS then goes on to describe significant impacts that could result from the Lava Ridge project (ex. DEIS 3-80, 3-86). Based on the existing wind generation capacity in BCR 9 (8.5 GW), the potential combined capacity proposals of Lava Ridge, Salmon Falls, and Taurus would increase wind energy generation in Idaho by roughly 40%. While this is desirable from a renewable energy perspective, we are concerned that the potential to affect the population status of	EIS Section 3.3.2.2.2 (Avian Populations, Alternative B). As stated in this section, "The estimated avian fatality rate used in this EIS (and detailed below) was based on available data from existing wind farms, which had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the project. Thus, the estimated avian fatality rates used in this EIS account for variability in the RSH." Although there are no existing U.S. wind energy facilities of the size proposed, the use of per-MW fatality rates is well established in the publicly available literature and allows for the fatality rates observed at existing facilities to be scaled up to the size proposed. The EIS discloses the uncertainty involved in this approach and the need for postconstruction monitoring to better quantify fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities. Two full years of avian use studies (WEST 2021a, 2023) were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, detailed studies of migratory routes are beyond the scope of this EIS. As described in the response to comment 11534-15 (see in Table A-3c, Birds), the siting corridors have been sited outside of known migratory routes in the area. Cumulative impacts to avian populations are disclosed in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts) and the future expansion of wind energy facilities within the analysis area was considered when determining the potential for each species to population-level impacts from collisions with operational turbines; see EIS Section 3.3.2.2 (Avian Populations, Impacts). Raptor nests, effects to breeding raptors, turbine siting considerations, and mitigation measures (including feathering and curtailment) are also discussed in the section; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. Effects to avian habitat and the effects of construction activities on avian species are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1 through AIB-5.

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		avian communities through cumulative impacts in BCR 9 are significant given the known mortality 10 https://www.blm.gov/sites/blm.gov/files/docs/2022-04/Programs_FishandWildlife_BLMIdaho_Special_Status_Species_Animals_2022.pdf rates at operational facilities. The trajectory of wind energy development in the region over the next 30 years would magnify these cumulative effects exponentially. The DEIS also states that reductions in avian mortalities are unlikely to be realized with changes in turbine design (DEIS 3-86). New Lava Ridge alternatives that might be considered must take these realities into account when assessing not only mortality by direct collision, but other considerations as well, such as: ● displacement, barrier effects, species-specific life history needs, habitat change or loss (Drewitt and Langston 2006)11 ● consequences of construction activities, turbine placement and operations in differing habitat disturbance regimes ● postconstruction fatality monitoring ● raptor breeding sites, nest failure thresholds and fledgling behavior during parenting ● ongoing research on minimization techniques such as curtailment, blade feathering, etc. ● meaningful mitigation strategies that result in better outcomes for populations in other areas There are likely several flyways across the Snake River Plain. It is unclear if the Lava Ridge Project is within or outside these flyways. The BLM should analyze where the Lava Ridge project is relative to these flyways so that appropriate mitigation can be designed and provided. ICL is also cognizant that world-wide failure to rapidly increase renewable energy production and decrease fossil fuel generation will permanently destabilize the climate. The effects to biodiversity, ecosystem processes and human communities will be far more pervasive and disruptive than impacts from well-placed renewable energy projects.	
11803-1	Jon Christianson	It does not appear to the [Sawtooth Conservation and Recreation Alliance, Inc. (SCRA)] SCRA that the environmental impact to the ecosystem of the SNRA from the expected significant loss of migratory birds due to wind farm mortality has been investigated or mitigated at all in the proposal. The SCRA believes that such a project as the Wind Project should only be undertaken in this migratory corridor if there can be assurances backed up by adequate legal recourse that these wind farms will have no impact on the ecosystem of the SNRA.	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), the project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). A number of additional mitigation measures would be implemented throughout the life of the project to further minimize or avoid impacts to raptors, golden eagle, and other avian species; these include additional raptor nest surveys and avoidance buffers for active nests, and a minimum of 2 years of postconstruction fatality monitoring (applicant-committed measure 150 in EIS Appendix 4 [Mitigation]) to assess actual avian fatality rates and to determine whether Tier 5 studies (additional measure x) and adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce fatalities; additional fatality monitoring would be required to assess the effectiveness of adaptive management measures. With the implementation of these measures, none of the action alternatives would be expected to notably impact avian populations in the Sawtooth National Recreation Area and further analysis in the EIS is not warranted.
11833-3	Bob Hassoldt	Looking at section 3.3.2 in the DEIS, page 3-58, “Fatality estimates for the project are based on the fatality rates observed at other wind facilities in the western United States, and it is assumed that the fatality rate for the project would fall within the range observed at other wind facilities (on a per-MW basis). The problem is, as mentioned, that this facility is larger than any other in the United States. Any assumptions made are going to be educated guesses, not something with a high confidence interval. How can we be assured that avian and raptor fatalities won't be multiplicative rather than straight-line additive as you’ve indicated here?	See response to comment 11535-29 (see in Table A-3c, Birds).
11849-1	Charles Brockway	Studies of impacts on aviation populations descried in the EIS are inadequate and do not meet ordinary standards for scientific evaluations for a specific site and project. The area is home to horned lark, western meadowlark, Brewer's sparrow, common raven, mourning dove, grasshopper sparrow, brown-headed cowbird, barn swallow, sage thrasher, Swainson's hawk, and lark sparrow. As just one example of likely impact, on June l, 2022, a horned lark was clocked with range finder and found to be flying 107 m vertically, which aligns with the blade diameter of the wind turbines. The BLM did not conduct these types of necessary site specific evaluations but used simplifications and extrapolations from analogous projects that the EIS admits fail to match the scale of the Lava Ridge project.	EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail) provides a summary of important life history traits, demographic information, and susceptibility to impacts from wind energy development for the four species analyzed in detail in the EIS (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl). Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) presents this information for the special-status avian species with the potential to occur in the siting corridors that were determined to have a low likelihood of population-level effects. As described in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), “Despite the trend toward increasing avian fatalities from wind energy, this source of mortality will remain relatively small when compared to other sources of avian mortality—such as collisions with vehicles, buildings, transmission lines, and communication towers; exposure to pesticides and other toxic chemicals; and predation by domestic and feral cats (AWWI 2016; Loss 2016; National Wind Coordinating Collaborative 2010)—and for most species, this source of mortality will be too small to have a notable effect on their populations (AWWI 2016; Choi et al. 2020).” This section also describes the higher avian fatality rates associated with other forms of energy generation and the potential that alternatives with lower generating capacities could result in greater impacts to avian populations if other types of energy generation are used to satisfy the demand for electricity that would have been generated under alternatives with higher generation capacities. The grasshopper sparrow and sage thrasher are discussed in Table App3-3; the other species referenced are not included in the EIS analysis because they do not carry a special-status designation in Idaho, and therefore, are assumed to have relatively large and stable populations.
11860-13	Shauna Robinson	The information included in the DEIS about the Western Burrowing Owl is extremely inadequate. A proper survey was conducted to provide accurate information about the unique and vulnerable species. The nest studies were termed as “incidentals” in a survey that was not “targeted” for Western Burrowing Owl nests in either 2020 or 2021 (3-66)! Surveyors reported observing only ten Western Burrowing Owls in their first year of surveying, noting they did not see any owls in the winter (3-70-71) Of course they did not see any in the winter because the owls migrate south to warmer areas like Mexico. Based on monitoring of Burrowing Owls my husband and I have done for about ten years of nests south of Twin Falls near Nat Soo Pah, the numbers of owls that return to an area are unpredictable. There can be numerous sightings one year, yet very few the following year. To establish a true accounting of the owls, observations must be conducted over multiple years, not just two as was completed for the DEIS. Also, the habitat	As disclosed in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail), burrowing owl use in the siting corridors is likely to be higher than reported because avian use surveys were not designed to detect the species. Therefore, mitigation measures for burrowing owls were modified and expanded in the final EIS; these include preconstruction surveys for burrowing owl nests and avoidance buffers for active nests (additional measure q) as well as the removal of loose rocks to avoid creating habitat for prey (additional measure s); see EIS Section 3.3.2.2.2 (Avian Populations, Alternative B with Additional Measures) and EIS Appendix 4 [Mitigation]).

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		and available food supplies, i.e., rodents and insects, need to be monitored, in addition to other raptors / wildlife that might share the same area as the Burrowing Owls, like Swainson Hawks or badgers. Noting if grazing is near the burrow is important, too, as the cow dung is spread around the entrances to the burrows to attract insects that the Burrowing Owls eat. If the Lava Ridge project interrupts the grazing on numerous allotments, this, in turn, could affect the owls. Limited food sources can then affect the clutch size (2-12).	
11860-14	Shauna Robinson	The Short-Eared Owl also lacked a survey designed just for owls so accurate numbers could not be reported in the DEIS. As with the Burrowing Owls, multiple-year surveys are needed to monitor nesting areas, numbers, etc. There are Short-Eared Owls that stay in the area year-round. Also of note, at the first of April, when leaving the Minidoka NHS one evening around 7:00, the wildlife management area south of the camp was alive with Short-Eared Owls. We observed 6-10 owls flying, perched on fence posts, and sitting on the ground in that WMA, which is situated just a few miles from the planned corridors and turbines of Lava Ridge.	Because the avian use surveys (WEST 2021a, 2023) did not target owls, mitigation measures for short-eared owls were modified and expanded in the final EIS; these include preconstruction surveys for short-eared owl nests and avoidance buffers for active nests (additional measure r). Additionally, MVE would complete a minimum of 2 years of postconstruction monitoring (applicant-committed measure 150 in Appendix 4) to assess the actual short-eared owl fatality rate and, if high fatality rates are observed, to determine which adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce short-eared owl fatalities. Additional monitoring would be required to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).
11860-15	Shauna Robinson	The current DEIS report on migrating avians is totally inadequate. They are protected by the Migratory Bird Treaty as mentioned and deserve a more comprehensive study in light of a potential wind project that could very well impact their migration.	See Section 3.3.2.2.2 for a discussion of MBTA compliance.
11860-16	Shauna Robinson	One “large bird” species of interest in the Lava Ridge area is the Tundra Swan, a species that did not have adequate information about it in the DEIS. The DEIS remarks about “large bird” species One Saturday in early April, when driving just north of the recharge area on the Milner-Gooding Canal, my husband and I noticed the large recharge lake and quite a number of waterfowl, among them Tundra Swans. There were approximately forty swans on the north edge of the lake. We assumed, they were using the recharge lake as a stop-over place in their long migration to Canada and the tundra areas of the far north. The next week, we returned to the recharge area with the local Audubon chapter members for some birding across the Lava Ridge area. The lake was totally dry, but when all of us traveled north to the Star Lake vicinity, we saw twenty Tundra Swans on the south side of the lake. Our guess was some of the swans had moved to the next water source with Carey Lake to the north as the next stop. Such migration across the Lava Ridge could very well pose problems for the Tundra Swans or other migrating birds, lured by the seasonal water sources. Thousands of birds are expected to die from turbine collisions at Lava Ridge (3-71), and swans could very well be part of that number. Impacts ARE the impact!! More survey work of the specific migrating species is needed, along with documentation of their seasonal flyways, to enable responsible strategies and siting of turbines to minimize avian collisions in the event the wind project is built.	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, including seasonal variation in diurnal raptor use. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and EIS Table 3.3-7. Detailed data from the first year of avian use studies is presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies (WEST 2023) were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. Detailed studies of migratory routes are beyond the scope of this EIS. Although tundra swans were recorded during the second year of avian use studies, the species does not meet the criteria for analysis in the EIS because it does not have a special-status designation in Idaho, and therefore, is considered to have a relatively large and stable population. There are also no records of fatalities of any swan species at existing U.S. wind energy facilities, indicating that the species is at low risk of colliding with operational turbines.
11871-2	WildLands Defense	Several alternative elements purposefully and unlawfully delay critical surveys for sensitive wildlife species including sensitive burrowing owls until post-decisionally. Many other wildlife species – including sensitive Long-Billed curlew and many other migratory birds, Idaho amphibians and mammals receive no systematic surveys of any kind.	See response to comment 11871-12 (see in Table A-3c, Birds).
11871-5	WildLands Defense	Critical data on project adverse impacts raptor prey species is absent.	See response to comment 11871-12 (see in Table A-3c, Birds).
11871-8	WildLands Defense	There is no assembled data on avian and bat migration routes in the local and regional area, despite available technology	As recommend by the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012), MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]), and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities.” As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), “The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project.” A number of other measures that would be implemented to minimize or avoid impacts to birds are described in EIS Section 3.3.2.2.2 and EIS Appendix 4 (Mitigation). Detailed studies of migratory routes are beyond the scope of this EIS but are included as potential adaptive management or compensatory mitigation for avian and bat species; see the BBCS and EIS Appendix 4 for additional details.
11871-12	WildLands Defense	Alternative comparisons are flawed “ Same as Alternative B, except additional preconstruction surveys would be implemented to better assess burrowing owl use in the siting corridors. Additional postconstruction monitoring requirements would also be implemented to better assess avian fatality rates and identify opportunities to minimize or avoid effects to species of concern (e.g., ferruginous hawk)”. These surveys need to be done at the start, in order to develop a reasonable range of alternatives and properly assess impacts. “These additional measures would minimize the potential for the project to cause, or contribute to, a trend toward federal listing for special- status avian species”. WHAT is the specific scientific basis for such claims? How severe will mortalities and habitat loss and displacement be for all species under all alternatives? What is the actual local and regional population of all impacted species, and what threats are these species facing? What is the rate of their population declines?	Table ES-2 in the Environmental Impacts section of the Executive Summary presents a brief summary of the impacts of each action alternative analyzed in the EIS. Reader should refer to EIS Section 3.3.2 (Avian Populations) for additional details. As described in that section, the studies conducted for the project to date and additional studies proposed both pre- and postconstruction have been, or will be, conducted in accordance with the tiered approach recommended in the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).

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11871-40	WildLands Defense	Report Table 4. Avian species of concern with potential to occur at the Lava Ridge Wind Project in Lincoln, Jerome, and Minidoka counties, Idaho. The list omits Brewer's sparrow, LBCurlew. WERE the present where and when willets and others may be found? Or Rosy finches in winter using lava tubes??	See Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) for a description of avian species not analyzed in detail Section 3.3.2.
11871-43	WildLands Defense	M-39 states: Fatality studies were screened to provide "comparable" information across WEFs by including annual fatality estimates that 1) were calculated from turbines greater than 0.5 megawatt (MW), 2) were calculated from the Huso, Shoenfeld, or GenEst estimators, 3) covered adequate sampling time for taxa of interest when most fatalities have been observed (i.e., two seasons for bats, three seasons for birds), and 4) were averaged for each WEF when multiple fatality studies were conducted at a facility. M-40 states: Forty-eight species of birds were documented in or near the Project across all avian studies at the Project, which account for approximately 18% of the 268 avian species that have been reported in Lincoln, Jerome, and Minidoka counties (eBird 2021), 11–12% of the 385–432 species reported in Idaho (eBird 2021, IDBRC 2020), and 10% of the 498 avian species reported in the Great Basin BCR (eBird 2021) over the last 10 years. Overall, the Project appears to contain a low number of avian species relative to these broader landscape scales, and the species typically observed were those commonly found throughout similar habitats in the region".20 2019). The closest operating WEF to the Project with public postconstruction fatality data is the Horse Butte wind facility, a 32-turbine facility located approximately 105 mi (169 km) northeast of the Project on the eastern edge of the Columbia Plateau and the western edge of the Middle Rocky Mountains in Idaho. All-bird fatality estimates from Horse Butte were 1.9 birds/MW/year in 2012, 2.6 birds/MW/year in 2013, and 3.5 birds/MW/ year in 2014 (SWCA 2015). These estimates are within the range of estimates from BCR 9 and larger spatial scales. We are very concerned that BLM does not provide sufficient detail on number of turbines, turbine height and type and details of facility activities, and the landscapes where the few facilities used as comparisons are located. Google searching reveals that Horse Butte contained only 32 turbines. There is no data on the specific fatality monitoring methods and whether there was use of detection dogs at all facilities used for comparison and in the various industry consultant databases. Mortality monitoring has relied on consultants paid by industry and studies developed primarily by industry. These efforts to downplay mortality and describe birds as 'common" are made much more alarming by the fact that there are not detailed analyses of avian migration patterns across Idaho. Why weren't avian migration studies conducted? Increasingly sophisticated technology allows significant amounts of information to be garnered.	The BBCS (Appendix M in MVE [2023]) briefly summarizes information on avian fatalities at multiple spatial scales. Studies were screened for their inclusion in the analysis based on the criteria cited in the comment, including study methodology. As described in the *Analysis of Avian and Bat Fatalities at Existing Wind Facilities* (WEST 2021c), these fatality rates are based on data from 530 studies across 341 existing U.S. wind energy facilities. A discussion of the fatality estimates presented in the *Analysis of Avian and Bat Fatalities at Existing Wind Facilities* (WEST 2021c), which are restated in the BBCS, as well as fatality estimates obtained from other sources, such as the AWWI database is provided in the Turbine Collisions section in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B). As stated in this section, "The estimated avian fatality rate used in this EIS (and detailed below) was based on available data from existing wind farms, which had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the project. Thus, the estimated avian fatality rates used in this EIS account for variability in the RSH." Although there are no existing U.S. wind energy facilities of the size proposed, the use of per-MW fatality rates is well established in the publicly available literature and allows for the fatality rates observed at existing facilities to be scaled up to the size proposed. The EIS discloses the uncertainty involved in this approach and the need for postconstruction monitoring to better quantify fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities. Two full years of avian use studies (WEST 2021a, 2023) were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, detailed studies of migratory routes are beyond the scope of this EIS.
11871-46	WildLands Defense	WEST Avian Year 2 Study Concerns The report state: "The primary objectives of the two-year study were to estimate levels of use by avian species within the Project Area, with a focus on areas being considered for turbine development, and to characterize levels of potential risk that the proposed Project presents to eagles and other avian groups. Two years of observational surveys are recommended in the ECPG for characterizing levels of potential risk caused by a proposed wind project to eagles (USFWS 2012, 2016). In accordance with these guidelines, the Year 1 study collected data for all birds, while the second year of the study focused on eagles and other large birds. This report summarizes results from the second year of the study completed at the Project from April 1, 2021 to April 17, 2022". WHY were there not detailed year 2 studies for all avian species? Conditions can vary greatly from year to year (witness winter 2023) – ad given drought conditions, snow pack, weather patterns during migration when these lands may be a stopover site in proximity to the canals and other waters, irruptions of raptor prey species such as voles which may attract large numbers of raptors, etc. There simply have not been sufficient avian studies.	The results of the second year of avian studies were not available prior to the publication of the draft EIS. The final EIS includes a description of the results of the year 2 avian study (WEST 2023).
11871-47	WildLands Defense	Regarding Diurnal Raptors: "Raptors are known to be strongly affected by wind turbines, primarily through direct mortality (collisions) and secondarily through habitat alteration and loss (Watson et al. 2018). Most raptors and vultures are long-lived species that have high natural adult survival and low reproductive potential relative to short-lived species, increasing their potential for population-level impacts (Schaub 2012). Many raptor species known to collide with turbines are taxonomically related and share similar flight morphology and foraging habits (Herrera-Alsina et al. 2013) including buteos (e.g., red-tailed hawk, Buteo jamaicensis) and small falcons (e.g., American kestrel, Falco sparverius) in the US (Smallwood and Thelander 2008, ICF International 2015). The likelihood of collision is highly variable and dependent upon the interaction of site location, season, and species-specific behaviors (Marques et al. 2014)".	EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) describes the risk of population-level effects to diurnal raptors from turbine collisions and discusses the high degree of variation among species in the risk of population-level effects because of differences in each species' behaviors and habitat use. Population size and demographics must also be considered when assessing the potential for fatalities from turbine collisions to result in in population-level effects. This is also addressed in EIS Section 3.3.2.1.1, which states "Relatively large increases in mortality (as many as 5,000 additional deaths per year) do not appear to threaten the range-wide populations of raptors with larger, more stable populations such as red-tailed hawk and Swainson's hawk, and smaller, local populations (i.e., within a BCR) may not experience population-level effects from this level of mortality either (Conkling et al. 2022)." Red-tailed hawk and American kestrel have a relatively high risk of colliding with operational turbines but do not meet the criteria for inclusion in the EIS because they have relatively large stable populations, and the publicly available literature indicates that mortality at wind energy facilities does not pose a serious threat to the populations of either species.
11871-48	WildLands Defense	Regarding "Temporal Patterns of Fatalities: Temporal patterns at multiple spatial scales show peak bird fatalities during spring and/or fall migration seasons, particularly for small birds (Figure 2; WEST 2021) and are particularly evident at spatial scales with larger sample sizes (i.e., Great Basin BCR, USFWS Pacific region, North American Deserts, US). A closer examination of the species groups composing the fatalities reveals that passerines are the dominant species groups across all spatial scales (Figure 3). Fatality patterns from scales with low sample sizes (e.g., Idaho) should be interpreted with caution". The report states: "Species of concern that were found during postconstruction fatality monitoring at the Horse Butte wind facility in Idaho included Brewer's sparrow, black rosy-finch, Columbian sharp-tailed grouse (Tympanuchus phasianellus), and golden eagle (SWCA 2015). Two of these species (golden eagle and Brewer's sparrow) have been recorded at the Project". Where is the species list for all birds observed at the Horse Butte site? Table 8, M-42 provides no fatality estimates for raptors in Idaho. "Small Birds. Passerines are another group of concern because of impacts from WEF, although most small species (e.g., songbirds) appear less vulnerable to collisions with wind turbines on an individual level than raptors (Allison et al. 2019). Most songbirds are short-lived species and have low natural annual survival and high reproductive potential relative to long-lived species (e.g., raptors). This combination of life-history traits reduces their potential for population-level impacts from collisions with wind turbines or other forms of anthropogenic development (Stahl and	See response to comment 11871-43 (see in Table A-3b, Bats). The postconstruction fatality monitoring reports for Horse Butte Wind are included in the project record. The BBCS (Appendix M in MVE [2023]) briefly summarizes information on avian fatalities at multiple spatial scales; it is not possible to estimate a raptor fatality rate for Idaho alone because there have been too few recorded raptor fatalities at existing wind facilities in Idaho for which data are available. EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) has been updated with additional postconstruction fatality monitoring data obtained from IDFG subsequent to the publication of the draft EIS; these studies showed that overall avian fatality rates at wind energy facilities Idaho are generally well below the regional mean (2.7 birds per MW per year) used in the avian fatality estimates presented in Table 3.3-12, despite the fact that all of the facilities for which IDFG provided data were located adjacent to large reservoirs, the Snake River, and other riparian areas and surface water. None of the studies could establish an estimated raptor fatality rate because too few carcasses (< 5) were found. Considering the project is much further from significant riparian habitat, large surface waters, and rocky cliff habitat present in the vicinity of other facilities studied in Idaho, it is possible that the fatality rates observed at the project would be well below the mean estimate and fatality rates exceeding the maximum estimates presented in Table 3.3-12 would be highly unlikely. Special-status avian species were individually assessed for their potential to experience population-level effects from fatalities due to collisions with operational turbines as described in EIS

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		Oli 2006)". This is another alarming effort to downplay the significance of mortality – as may songbird populations are in serious decline. See Rosenberg et al. 2019, The Decline of the North American Avifauna https://www.science.org/doi/10.1126/science.aaw1313 detailing the loss of 3 billion birds from North America. Since the Rosenberg et al paper, Avian flu is now decimating songbird, raptor, eagle and even mammal populations – witness the recently reported known deaths of four cougars in Wyoming. BLM must require fair unbiased consultants conduct studies and analyze data – and not wind industry biased environmental analysis. The Lava ridge environmental studies are a classic case of the fox guarding the hen house. "Small passerines, including both resident and nocturnal migrating songbirds, are the most abundant and diverse group of landbirds in the US, and most avian fatalities at wind projects in the US and Canada are passerines (Erickson et al. 2014, Allison et al. 2019, AWWI 2019). Passerines accounted for approximately 62.5% of the fatalities in 116 studies in the US and Canada, where 156 species of passerines totaling 3,110 fatalities were found (Erickson et al. 2014). It was estimated that approximately 134,000 to 230,000 fatalities occurred each year in the US and Canada combined, equaling a rate of 2.10 to 3.35 small birds/MW of installed capacity (Erickson et al. 2014). Fatalities were distributed among several species of passerines in the Erickson et al. (2014) analysis, such that impacts to individual species were a low (<0.1%) percentage of their respective estimated continental populations. Small passerines accounted for 56.5% of fatalities in the US and 51.3% in the Pacific Region (AWWI 2019"). HOW many of these studies/fatality monitoring efforts were conducted without use of carcass detection dogs and intensive site mortality detection surveys?	Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail); see also EIS Section 3.3.3 (Eagles), EIS Section 3.3.4 (Greater Sage-Grouse), and Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). As described in the list of data sources in EIS Section 3.3.2 (Avian Populations), the primary sources considered in determining past trends and the current status of avian populations are Partners in Flight (2022) and Sauer et al. (2019). Both of these databases use data collected by The North American Breeding Bird Survey program, which is a continent-wide program that has been collecting data on avian populations since 1966. As stated in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts) "Despite the trend toward increasing avian fatalities from wind energy, this source of mortality will remain relatively small when compared to other sources of avian mortality—such as collisions with vehicles, buildings, transmission lines, and communication towers; exposure to pesticides and other toxic chemicals; and predation by domestic and feral cats (AWWI 2016; Loss 2016; National Wind Coordinating Collaborative 2010)—and for most species, this source of mortality will be too small to have a notable effect on their populations (AWWI 2016; Choi et al. 2020). However, for some special-status avian species, when cumulative fatalities across BCR 9 are considered, there could be negative population-level effects that continue a downward trend. Thus, even though an individual wind energy facility on its own may not cause population-level effects, each facility constructed in BCR 9 over the next 30 years would further increase avian mortalities and the potential for declines in some avian populations. Thus, when evaluating the need for adaptive management measures, it is important to consider the mortality that is likely to occur at other existing and future wind energy facilities in BCR 9." Since wind energy development in BCR 9 has a relatively small contribution to the cumulative effects on most avian populations, reducing avian fatalities at wind energy facilities would do little to benefit those species. As described in the *Analysis of Avian and Bat Fatalities at Existing Wind Facilities* (WEST 2021c), these fatality rates are based on data from 530 studies across 341 existing U.S. wind energy facilities; therefore, it would be impractical to provide details on every wind energy facility and study included. A discussion of the fatality estimates presented in the *Analysis of Avian and Bat Fatalities at Existing Wind Facilities* (WEST 2021c) as well as fatality estimates obtained from other sources, such as the AWWI database (Allison and Butryn 2020) is provided in the Turbine Collisions section in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B). However, both WEST (2021c) and Allison and Butryn (2020) included only those studies that adhere to well established standards for postconstruction fatality monitoring and bias adjustments; thus, the fatality estimates presented in the EIS are based on the best publicly available data.
11871-49	WildLands Defense	Avian Report Year 1 – Additonal Concerns Please clarify what the report's use of the term "group" actually means. Is each sighting – of 1 or a flock of birds – considered a group – i.e. can there be a 'group" of one bird? The report states: "Mean use was the average number of birds observed per plot per survey for small or large birds. Small bird use (per 100-m radius plot per 10-min survey) and large bird use (per 800-m radius plot per 60-min survey) was calculated by: 1) summing birds per plot per visit, 2) averaging number of birds over plots within a visit, and 3) averaging number of birds across visits within a season. Overall mean use was calculated as a weighted average of seasonal values by the number of days in each season. Percent of use was calculated as the percentage of small or large bird use that was attributable to a particular bird type or species. Frequency of occurrence was calculated as the percent of surveys in which a particular bird type or species was observed. Mean use and frequency of occurrence describe different aspects of relative abundance, in that mean use is based on the number of birds (i.e., large groups can produce high estimates), whereas frequency of occurrence is based on the number of groups (i.e., it is not influenced by group size). Qualitative comparisons were made with these metrics among bird types, seasons, and survey points to help illustrate temporal and spatial avian use of the Project.	A "group" as used in the avian use studies (WEST 2021a, 2023) can consist of one or more individuals of the same species.
11871-51	WildLands Defense	Avian Report Year 2 Additional Concerns Avian Report year 2 discussion below describes our significant concerns in more detail. Avian Report Year 2 fatality numbers appear to be very low. For example, Golden eagle. The Report at 14-15 states: "Potential impacts to birds from power line operation include electrocution and collision risks, which depend on-line location, voltage, and configurations relative to area habitats and bird presence/use. For the Project, 34.5-kilovolt (kV) collector lines from the wind turbines to the Project's substation, these electric lines will be buried to the extent feasible; however, depth to rock is shallow across portions of the Project. In these areas, Magic Valley Energy (MVE) anticipates a portion of the collector lines will be aboveground. To minimize potential electrocution and/or collision risks to birds, the aboveground portion of the 34.5-kV collector lines will be designed to meet Avian Power Line Interaction Committee (APLIC) guidelines (APLIC 2006 [to be updated 2021] and 2012, respectively)". How many miles and where are the locations that lines will be above ground vs. below ground? This is critical information for estimating powerline collision mortality. It is also essential to understand how much blasting and other construction activity may take place. Note: "Avian collision risk with overhead lines is not uniform. Determining the relative risk or exposure to birds is generally governed by the type of electrical infrastructure in proximity to bird species potentially present and site-specific factors, such as habitat, line orientation to use areas, topography, weather, bird morphology, flight characteristics, and level of human influences. Proximity of power lines to locations where birds are landing or taking off is important in assessing the potential collision risk or exposure, particularly during daily movements and migration (APLIC 2012). A number of best management practices could be applied to the above ground collection lines to minimize fatalities. A review of 11 studies monitoring the effectiveness of bird flight diverters installed on power lines found a 78% reduction in avian fatalities (Barrientos et al. 2011), although effectiveness can vary widely with diverter types and spacing …".	Table 2.4-1 in EIS Section 2.4 (Alternative B [Proposed Action]) provides total miles of overhead and underground 34.5-kV collector lines for each of the action alternatives. As indicated in this table, all of the action alternatives would require two blasts per day during construction. EIS Appendix 11 (Project Elements Common to All Action Alternatives) provides additional details on collector lines and blasting. As stated in the Underground and Overhead 34.5-Kilovolt Collection System section of this appendix, "The specific location where lines would be buried would be determined after the geotechnical studies are complete. For the purposes of analysis, this EIS assumes a ground-disturbance footprint for all collector lines and assumes overhead lines for most of the route when assessing impacts to birds, bats, and visual resources." MVE has committed to constructing all overhead collector and transmission lines in compliance with APLIC standards (APLIC 2006, 2012), which include the use of line markers or flight diverters to reduce avian collisions (applicant-committed measure 30). Effects to raptors from collisions with or electrocution by overhead powerlines are described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-4. Several other mitigation measures would be implemented that limit development in the vicinity of important avian habitat features and known nest/lek locations for avian species of concern (e.g., applicant-committed measure 138); see EIS Appendix 4 (Mitigation) for a complete list.
11871-52	WildLands Defense	The avian studies do not provide sufficient information on many species – Long-Billed curlews, burrowing owl, etc. to allow this to be understood. The DEIS does not provide detail sufficient to determine this and to properly assess risk, harm and species "take'.	See response to comment 11871-100 (see in Table A-3c, Birds) and 11871-101 (see in Table A-3c, Birds).

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11871-55	WildLands Defense	Report at 14-15: “Various potential indirect effects including the modification, fragmentation, and reduction of habitat; interference with behavioral activities; exposure to contaminants; noise; the introduction and spread of invasive vegetation; and destruction of individual biota (e.g., from clearing and grubbing activities or from vehicle collisions) were noted in BLM 2005 Wind Energy Final Programmatic EIS (2005 Programmatic EIS). The construction impacts of most concern with regard to ecological resources are those associated with the reduction, modification, and fragmentation of habitat (2005 Programmatic EIS). Displacement effects are the primary indirect impact at WEFs, and have been defined as “the displacement of birds from areas within and surrounding wind farms due to visual intrusion and disturbance that can amount effectively to habitat loss” (Drewitt and Langston 2006). Displacement may occur during both the construction and operation of a wind project, and may be caused by the presence of the turbines and/or ongoing site activities such as vehicle and personnel movements or site maintenance. The scale and degree of displacement effects varies according to site and species-specific factors. The scale of disturbance caused by wind projects varies greatly and is likely to depend on multiple factors including seasonal and daily patterns of use by birds, location to important habitats, availability of alternative habitats, and turbine and wind project specifications (Drewitt and Langston 2006, Lange et al. 2018). Similarly, the degree of the behavioral responses will vary among species and individuals, and may depend on factors such as life cycle stage (e.g., wintering, molting, and breeding), flock size, and degree of habituation. Recent research has indicated that indirect impacts of wind turbines on grassland nesting birds from displacement vary across years, species, sites, and distance from turbines (Erickson et al. 2004, Young et al. 2006, Shaffer and Johnson 2009, Hale et al. 2014, Hale 2016, Johnson 2016, Shaffer and Buhl 2016). AWWI (2020) has concluded that indirect impacts on birds from operating wind turbines due to displacement result in some species showing consistent decreases in abundance while other species show no effect”. Again, necessary detailed pre-decisional surveys and ecological studies have not been conducted to determine this.	Effects to avian habitat, including avoidance of habitats due to noise and human disturbance, are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1. As noted in the comment, displacement effects vary widely across space, time, and species due to a number of variables that are difficult or impossible to predict; thus, any attempt to quantify the potential impacts from habitat avoidance would be highly speculative. The project has been designed to avoid habitat for sensitive avian species such as greater sage-grouse and a number of mitigation measures would be implemented to further minimize or avoid impacts to habitat for avian species (see EIS Appendix 4 [Mitigation]).
11871-56	WildLands Defense	Report at 15 states: “Preconstruction studies at the Project identified 48 species of birds, 19 of which are species of concern. Diurnal raptor use was highest during summer and fall and was relatively consistent across survey points. No patterns of spatial or temporal use for small birds were noted. One ferruginous hawk and three burrowing owls nests were located in the Project. Three greater sage- grouse leks are present near the Project”. These studies were only conducted for one year for migratory songbirds and many other avian species., and e are very concerned they do not reflect the potential variation in seasonal and migration activity use by avian species here. Further the consultants neglected collecting and using avian migration data that is available on-line to study migration in the region. This must be done pre-decisionally and used in a SEIS.	MVE’s *Analysis of Avian and Bat Mortalities at Existing Wind Facilities* (WEST 2021c) is one of many sources evaluated in the analysis of impacts to avian populations presented in EIS Section 3.3.2 (Avian Populations). See response to comment 11871-43 (see in Table A-3b, Bats).
11871-59	WildLands Defense	Much More Rigorous and Extensive Baseline Data Must be Collected and Properly Assessed – Not Dismissively Minimized as the WEST Avian Reports Do Why is a much better avian and other wildlife species baseline is needed. It is critical that at least 2 additional years of year-round studies be conducted to determine avian use in the project area and across a significant block of the surrounding landscape. Indeed, given the huge additional wind energy ROW applications – Taurus/Arevia, Salmon Falls, Cat Creek.	See response to comment 11871-43 (see in Table A-3b, Bats), 11871-101 (see in Table A-3c, Birds), and 11871-105 (see in Table A-3c, Birds).
11871-60	WildLands Defense	Year 2 Avian Report The Year 2 Avian report states: The principal objectives of the two-year study were to estimate levels of use by avian species 16 within the Study Area and to characterize levels of potential risk that the proposed Project presents to eagles and other avian groups. Report at 27: Fifteen species of concern were recorded during the Year 2 study, thirteen of which were also recorded in Year 1. Bald eagle, Franklin’s gull, and white-faced ibis were recorded in Year 2 but not in Year 1. Two small bird species, sagebrush sparrow and green-tailed towhee, were recorded in Year 1 but not in Year 2. Four waterbird species considered as species of concern (California gull, Franklin’s gull, American white pelican, and white-faced ibis) were recorded in the Study Area. These were likely transient occurrences, as there are few water resources and no large waterbodies within the Study Area to provide habitat for waterbird species. Burrowing owl observations were recorded throughout the Study Area, with most observations recorded near he edge of the Project. The prevalence of observations near the Project 1 edge may be associated with agricultural areas, which burrowing owls have been shown to prefer due to increased prey availability (Moulton et al. 2006). Short-eared owl was only observed once during surveys. Ferruginous hawk observations were made throughout the Study Area; however, observations were concentrated near Point 75. These observations were likely associated with a nest that was occupied by ferruginous hawks in 2021 (McCormack and Harrison 2021). Common nighthawk, a species common to open habitats, were recorded throughout the Study Area. Long-billed curlew were observed throughout the Study Area, and were primarily observed during March and April when the species is in migration. Greater sage-grouse were observed in two groups, both of which were outside the Project Area within 3.1 miles of known lek locations (Appendix E)”. We are concerned at WEST’s dismissiveness is of several things in the above paragraph. First, the public lands here may provide an important source of grasshopper, Mormon cricket, vole or other food sources -depending on the year- that are eaten by Gulls. Second, White-faced ibis are present in southern Idaho in irrigated pastures and similar areas, and are also found at small wetlands near ag. at times.	See response to comment 11871-103 (see in Table A-3c, Birds).
11871-61	WildLands Defense	Several species that are present during migration (and some such as lark sparrow may best here) are: lazuli bunting , spotted towhee, lark sparrow, lesser goldfinch, Eurasian dove XXX. We also wonder about the lack of any sightings of Merlin, Rough-legged hawk, Lazuli Bunting in migration, Kingbirds,	These species did not meet the criteria for inclusion in the EIS analysis because they do not carry a special-status designation in Idaho and are thus considered to have relatively large and stable populations that have a low risk of population-level impacts from wind energy development.
11871-64	WildLands Defense	M-48 refers to displacement. This is a very serious concern – especially given that “displacement” would occur to sub-optimal habitats, and there are immense additional energy projects being proposed across the region – including the BLM Solar EIS actions. “Indirect Impacts. Construction of the Project could result in habitat impacts that may lead to	Appendix M in MVE (2023) is the project BBCS; impacts to avian habitat and nesting behavior, including disturbance and displacement, are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) and tier to BLM (2005); see AIB-1 and AIB-2.

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		displacement of local avian species. Displacement effects are one type of indirect impact to birds caused by the avoidance of turbines or other infrastructure at WEFs. Displacement effects are defined as “the displacement of birds from areas within and surrounding wind farms due to visual intrusion and disturbance that can amount effectively to habitat loss” (Drewitt and Langston 2006). Displacement may occur during both the construction and operation of a wind project, and maybe caused by the presence of the turbines and/or other disturbances such as vehicle and personnel movements, as well as noise disturbance created by blasting, equipment use, and other construction and maintenance activities. The scale and degree of displacement effects varies according to site and species-specific factors. The scale of disturbance caused by wind projects varies greatly and is likely to depend on multiple factors, including seasonal and daily patterns of use by birds, location to important habitats, availability of alternative habitats, and turbine and wind project specifications (Drewittand Langston 2006, Lange et al. 2018). Similarly, the degree of the behavioral responses will vary among species and individuals, and may depend on factors such as life cycle stage (e.g., wintering, molting, and breeding), flock size, and degree of habituation AWWI (2017). Research has indicated that indirect impacts of wind turbines on grassland nesting birds from displacement vary across years, species, sites, and distance from turbines (Leddy et al. 1999, Johnson et al. 2000, Erickson et al. 2004, Young et al. 2006, Shaffer and Johnson 2009, Hale et al. 2014, Hale et al.2016, Johnson 2016, Shaffer and Buhl 2016).	
11871-72	WildLands Defense	Comparisons among alternatives in Table ES-2 xvi are inadequate for Bats, avian species (nearly all lumped together), Golden Eagles, Sage-grouse and other sensitive species. Basically, under some alternatives, BLM appears to sacrifice some higher profile sensitive species that inhabit sagebrush, and sacrifice Long-Billed Curlew, Grasshopper Sparrow, Burrowing Owl - and potentially several other species habitats. Regrettably, the WEST reports and analyses fail to provide data on the “less sexy” sensitive species in a manner for the harmful; impacts of each alternative on avian species other than Sage-grouse can be systematically assessed and understood. BLM sensitive species policy does not say: It’s ok to sacrifice one sensitive species to “save” another”	Table ES-2 is part of the EIS Executive Summary and briefly summarizes the resource impacts described in detail in EIS Chapter 3 (Affected Environment and Impacts). The golden eagle is discussed in EIS Section 3.3.3 (Eagles), the western burrowing owl and long-billed curlew are discussed in EIS Section 3.3.2 (Avian Populations) and the grasshopper sparrow is discussed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). The WEST reports were one of numerous sources evaluated in the analysis of impacts to the species; see data sources in the introduction to each of these sections. A number of mitigation measures would be implemented to minimize, avoid, or offset impacts to BLM-sensitive species; a complete list of required mitigation measures is provided in EIS Appendix 4 (Mitigation).
11871-73	WildLands Defense	Avian Species - Alt. B states: “Highest estimated avian fatality rate from collisions with turbines: 3,240–5,654 (mean), 10,200–17,799 (maximum) birds per year. Most avian species are unlikely to experience population-level effects, but some special- status species (e.g., ferruginous hawk, long- billed curlew, short-eared owl, and burrowing owl) could experience population decline”. Note this would be based on the very likely large-scale under-estimates of mortality from deficient carcass searches used throughout the EIS. There is greatly inadequate data and lack of baseline analysis of the current status and condition of the local population of these species. Thus, it is impossible to make an informed analysis of differences between alternative actions. Table ES-2.	Table ES-2 in the Environmental Impacts section of the Executive Summary presents a brief summary of the impacts of each action alternative analyzed in the EIS. Readers should refer to EIS Section 3.3.2 (Avian Populations) for additional details. As described in this section, data from postconstruction fatality monitoring studies at existing U.S. wind energy facilities were used to inform the estimate of avian fatalities that would occur under each of the action alternatives, but each species was individually assessed for its potential to experience population-level impacts from collisions with operational turbines based on a number of species- and site-specific factors. The EIS does not assume that a low incidence of recorded fatalities at existing U.S. wind energy facilities is sufficient evidence to conclude that turbine collisions do not present a risk to a species. In fact, there are very few recorded fatalities at existing U.S. wind energy facilities for each of the four species analyzed in detail in the EIS. The EIS discusses the deficiencies in the available mortality data and discloses the potential for fatality rates to be higher than expected based on these observations. The EIS also discloses the potential for these species to experience significant effects from even a relatively small number of fatalities from collisions with operational turbines. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).
11871-80	WildLands Defense	The report’s Figure 1 map with turbine overlays – a viewer can’t see many biological indicators – Sage-grouse leks, raptors. Are burrowing owl sitings on here? Are burrowing owl nest sites assessed in these noise analyses? What are noise levels at all burrowing owl nests? Have thorough studies actually been conducted for this species? What is the population density and numbers of total burrow sites? If studies have not systematically inventories the whole site, this must be and proper noise estimates for this species too, and other sensitive species including passerines, and bats, must be undertaken. So too must studies for nocturnal owls – for example, Barn Owls do not even show up on the species list – despite the prominence of this species in road kills by I-84 and other areas of southcentral Idaho.	As described in the project noise technical report (SWCA 2022), background noise is assumed to be 19.3 dB at raptor nests. Noise impacts to bats and nesting birds are discussed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-8 and AIB-2, respectively. Migratory western burrowing owls typically select new burrows for nesting each year; therefore, including previously recording burrowing owl nests in the project noise technical report would not lead to a more informed analysis. As disclosed in EIS Section 3.3.2.1.1 (Affected Environment, Species Analyzed in Detail), burrowing owl use in the siting corridors is likely to be higher than reported because avian use surveys were not designed to detect the species. Therefore, mitigation measures for burrowing owls were modified and expanded in the final EIS; these include preconstruction surveys for burrowing owl nests and avoidance buffers for active nests (additional measure q) as well as the removal of loose rocks to avoid creating habitat for prey (additional measure s); see EIS Section 3.3.2.2.2 (Avian Populations, Alternative B with Additional Measures) and EIS Appendix 4 [Mitigation]). Barn owls are not addressed in the EIS because they do not carry a special-status designation in Idaho, and therefore, are considered to have a relatively large and stable population.
11871-85	WildLands Defense	And: “The Kieler Report (2007) observes that the flight patterns of some species, including geese, ducks, cranes, and gulls, tend to have wider radii of spatial avoidance around large WTs than around highways and local roads. Although their data suggest that the visual disturbance caused by WTs is likely the main reason for this finding, they also suggest that some birds, especially geese, are more sensitive to WTN than to noise originating on roads and railroads [64](p. 213). In addition to injuries and deaths from collisions, the report considers it highly probable that WTs have a combined audio-visual effect on birds. In conclusion, the Kieler Institute authors claim that data and knowledge about WTN and its effects on bird populations and habitats remain insufficient, while still contending that birds’ sensitivity to noise means that WTN should be minimized, without suggesting specific measures [64]. That said, the report notes that acoustic walls would be insufficient for minimizing the effects of WTN on birds, because they often fly higher that the walls”. https://www.sciencedirect.com/science/article/pii/S1364032122006852	Effects on noise on avian species as well as impacts to avian migration patterns are disclosed in Table App3-1 in EIS Appendix 4 (Issues Analyzed in Brief); see AIB-2 and AIB-5.

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11871-93	WildLands Defense	Factors leading to high mortality wind facilities included: Projects located in a critical migratory pathway for songbirds; many raptor species are present; impacts habitat for declining grassland birds This wind energy project, on the Kenedy Ranch in southern Texas, is located inside the Gulf Coast and Lower Rio Grande bird migration corridors. Many sensitive grassland species, such as Sprague's Pipit, Savannah Sparrow, Horned Lark, Grasshopper Sparrow, and Long-billed Curlew, also use the area and could be harmed through collisions or displacement. Idaho BLM must stop treating the open space “grasslands” along the Snake River Plain and species like Long-Billed curlew as sacrifice zones and sacrifice species – which regrettably this DEIS and poor avian study reports and analysis does.	As described in EIS Section 3.3.2.1 (Avian Populations, Affected Environment), the siting corridors are not located in a major migratory flyway and habitat features that would concentrate migrating raptors are not present. A substantial proportion of the avian analysis in the EIS is focused on impacts to declining grassland birds such as the long-billed curlew (see Section 3.3.2 [Avian Populations]) and greater sage-grouse (see Section 3.3.4 [Greater Sage-Grouse]).
11871-95	WildLands Defense	“The industry has been saying for some time that bird mortality would be reduced with the new turbines compared to the older, lattice structures. According to this study, that does not appear to be the case,” Hutchins pointed out, since the study excluded data from wind developments using older designs.	The American Bird Conservancy news release referenced in the comment is an opinion piece and the quoted comment from Dr. Hutchins is a misrepresentation of the conclusions reached in the Loss et al. (2013) study being described. That study, which is referenced in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) (the citation was inadvertently left out of the draft EIS but has been corrected in the final EIS), was specifically intended to reassess cumulative avian fatality rates from wind energy facilities in light of the transition from older, lattice tower turbines to newer, monopole turbines and stated that “Our focus on [monopole turbines] could explain why our estimate is lower than the estimate of Smallwood (2013) that also includes data from lattice turbines. Lattice turbines can kill relatively large numbers of birds (Smallwood and Karas 2009), but they are largely being decommissioned in the U.S.” The study by Smallwood and Karas (2009), which is also referenced in EIS Section 3.3.2.2.2 found strong evidence that replacing lattice tower turbines with monopole turbines could significantly reduce fatalities of all birds, and Krigsveld et al. (2009) reached a similar conclusion. Smallwood, K.S. 2013. Comparing Bird and Bat Fatality-Rate Estimates Among North American Wind Energy Projects. *Wildlife Society Bulletin* 37(1):19–33. Available at: https://wildlife.onlinelibrary.wiley.com/doi/abs/10.1002/wsb.260. Accessed December 29, 2013.
11871-96	WildLands Defense	According to ABC, poorly sited and operated wind projects pose a serious threat to birds, especially birds of prey such as Bald Eagles, Golden Eagles, hawks, and owls; endangered and threatened species such as California Condors and Whooping Cranes; and species of special conservation concern such as the Bicknell’s Thrush, Cerulean Warbler, Tricolored Blackbird, Sprague’s Pipit, and Long-billed Curlew. One particularly interesting finding of the new study concerned the height of turbines. The scientists found that bird collision mortality increased significantly with increasing hub height. Across a range of turbine heights from 36 to 80 meters, the study predicts a staggering tenfold increase in bird mortality. This is especially important because the study identifies an apparent trend toward increased turbine height. Further, the study states: “This estimate (1.4 million) assumes that average wind turbine height will not increase. Installation of increasingly larger turbines could result in a greater amount of mortality.” Such an eventuality may be likely given that a Department of Energy report found that the average turbine hub height of U.S. wind turbines has increased …”.	Although Loss et al. (2013) found preliminary evidence that avian fatalities increase with hub height, other studies have reached contradictory conclusions and it remains unclear how hub height effects avian fatality rates. Loss et al. (2013) focused on fatalities per turbine rather than fatalities per MW, which obscures the fact that turbines with higher hubs also have a larger generation capacity; therefore, although more fatalities may occur at larger turbines, the relationship between fatalities and generation capacity remains relatively unchanged. Therefore, using a larger number of small turbines to generate a given amount of electricity would be expected to result in a similar number of avian fatalities as generating that electricity with a smaller number of large turbines.
11871-97	WildLands Defense	ABC also stated: “The report offered several additional key observations about wind energy and bird mortality: • The mortality rate at wind farms in California was dramatically higher than anywhere else. According to the study: “We estimate that 46.4% of total mortality at monopole wind turbines occurs in California, 23.1% occurs in the Great Plains, 18.8% occurs in the East, and 11.6% occurs in the West.	As Loss et al. (2013) noted, these percentages are a result of variation in both numbers of turbines and mortality rates and added that this variability could not be explained by differences in hub height. Loss et al. found that the per/MW fatality rate for the western U.S. was 2.83 birds per MW per year, which is consistent with the mean fatality rate analyzed in EIS Section 3.3.2.2 (Avian Populations, Impacts).
11871-98	WildLands Defense	• Failure to consider species-specific risks may result in relatively high rates of mortality for some bird species even if total mortality is relatively low.	Special-status avian species were individually assessed for their potential to experience population-level effects from fatalities due to collisions with operational turbines as described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail); see also EIS Section 3.3.3 (Eagles), EIS Section 3.3.4 (Greater Sage-Grouse), and Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief).
11871-99	WildLands Defense	Annual mortality estimates derived from a partial year of sampling may substantially underestimate mortality. Preconstruction studies should be conducted for at least one entire year prior to wind facility siting decisions.	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, including seasonal variation in diurnal raptor use. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and in EIS Table 3.3-7. Detailed data from the first year of avian use studies are presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies (WEST 2023) were not available prior to the publication of the draft EIS but have been incorporated into the final EIS.
11871-100	WildLands Defense	Conclusions about collision rates and impacts of collisions on bird populations are tentative because most of the mortality data is in industry reports that are not subjected to peer review or available to the public. • Preconstruction assessment of collision risk at proposed wind facilities has been unreliable with no clear link documented between predicted risk levels and postconstruction mortality rates. “A key issue that was illustrated in this study, and one that we continue to have great concerns about, is data transparency and availability. While some companies may do the right thing and collect bird mortality data and make it available, others may not, especially if it is not in their economic interest,” Hutchins added”. https://www.wind-watch.org/news/2012/08/01/wildlife-kill-data-under-scrutiny/	Although the avian use surveys (WEST 2021a, 2023) were used to determine the species that may be present in the siting corridors and their seasons of use, the risk of fatalities from turbine collisions varies among species due to factors such as flight characteristics, type of prey, and habitat use. Thus, avian use observed prior to construction may not correlate directly to fatality rates after construction (WEST 2011). The fatality rates presented in Table 3.3-12 are not intended to be precise estimates, they are presented to illustrate how generation capacity effects avian fatalities to allow for a reasoned choice among alternatives. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).

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11871-101	WildLands Defense	Long-Billed Curlew - Example of A Species Where DEIS an dConsultants Seriously Downplay Risks and Failed to Collect Sufficient Breeding Period Data Long-billed Curlews appear to begin breeding in early to mid-April throughout much of Idaho. Breeding atlas or lat-long locations: Long- billed Curlews breed at various locations throughout southern Idaho, including Camas Prairie Centennial Marsh, the Snake River Birds of Prey National Conservation Area, Magic Reservoir, Camas NW … https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1464&context=usfwspubs Long-billed Curlew mortality: https://www.klickitatcounty.org/DocumentCenter/View/401/50-Avian-Bat-and-Habitat-Cumulative-Impacts---May-18-2011 TNC on Long-Billed Curlew https://www.nature.org/media/montana/wind-report.pdf Katzner et al. 2023 describe LBC poaching mortality in SW Idaho: file:///Users/katiefite/Downloads/KatznerEtalIllegalKillingNongameWildlife2020.pdf "In total, 33% of telemetered long-billed curlews (Numenius americanus) and 59% of other bird carcasses found with known cause of death (or 32% of total) were illegally shot. Analysis of spatial distributions of illegal and legal shooting is consistent with birds being shot illegally in the course of otherwise legal recreational shooting, but snakes being intentionally sought out and targeted elsewhere, in locations where they congregate. Preliminary public surveys indicate that most recreational shooters find abhorrent the practice of illegal killing of wildlife. Viewed through this lens, our data may imply only a small fraction of recreational shooters is responsible for this activity. This study highlights a poorly known conservation problem that could have broad implications for some species and populations of wildlife. "The NCA and the ACEC were established to aid in conservation of locally robust populations of raptors and curlews, respectively. It is, therefore, ironic that these species are among those we documented as illegally shot. Although curlews elsewhere are not thought to be targeted by shooters, raptors, globally, regularly are shot (Olson, 1999; Russell & Franson, 2014), in part because they are viewed as threats to livestock or game (Redpath et al., 2013). Snakes, and particularly rattlesnakes, also are killed because of the threat they are perceived to pose … Comparisons of data from recent and historical surveys for curlews in southwestern Idaho show severe population declines of >90%, from 2,000+ individuals in the late 1970s (Jenni, Redmond, & Bicak, 1981) to <200 in 2014 (Pollock, Miller, & Carlisle, 2014). This decline is ongoing through 2019 (Coates, Hayes, Clapsadle, Dougill, & Carlisle, 2019), and contrasts with a more stable range-wide population (Sauer et al., 2017). Illegal shooting of curlews has been a long-standing practice at the ACEC, with nine reported shot from 1977 to 1979 (Jenni et al., 1981). The ≥33% rate of shooting mortality we observed among 21 tracked adult curlews suggests a potential role for illegal shooting in the dramatic long-term declines observed for the local population of this long-lived and slowly reproducing species".	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and in EIS Table 3.3-7. Detailed data from the first year of avian use studies are presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies (WEST 2023) were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state that: "(a) EISs shall not be encyclopedic." Therefore, the description of long-billed curlew in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) presents a brief summary of the species' important life history traits, demographic information, and susceptibility to impacts from wind energy development. Although the EIS does not specifically discuss the effect that illegal shooting has had on the long-billed curlew, it provides adequate disclosure of the species' declining population range-wide and the importance of breeding populations in western Idaho to the overall population of long-billed curlews in BCR 9. Even though the very small number of long-billed curlew fatalities reported at existing U.S. wind energy facilities suggests this species has a low likelihood of colliding with operational turbines, the EIS conservatively assumes that even a small number of fatalities from collisions with operational turbines could be significant. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).
11871-102	WildLands Defense	WEST's claims about Long-Billed curlews being present in "migration" appear to be baloney - and instead birds are nesting here. This is the period when LBC commence nesting, and it is highly likely many of the birds observed were setting up territories and beginning to nest – and quieting down becoming less noticeable. If the WEST biologists were skilled observers, they would have skillfully observed the aerial flight "curlew, curlew, curlew' breeding displays of LBC. These flights would also put the curlews in danger of being killed by turbine blades. Plus, this species seems quite sensitive to overhead flight activity - and turbines and turbine shadows may be particularly problematic.	The avian use studies employed point-count surveys to generally characterize temporal and spatial variation in avian use in the siting corridors, observers did not record notes on avian behavior such as calls or mating displays. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and in EIS Table 3.3-7. Detailed data from the first year of avian use studies are presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. This included updating the long-billed curlew description in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) to indicate that the species was observed in the siting corridors during the second year of avian use studies. The analysis of impacts to long-billed curlew in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) has also been revised to clarify that "the species uses the siting corridors during spring migration and the summer breeding season."
11871-103	WildLands Defense	The consultants must provide maps for al sensitive species. p. 16. Shorebird use is highest in spring – consists mainly of Long-billed Curlew. Table 6 "frequency of occurrence" shows curlew abundance. Breaking results down by species is critical to establish a baseline and be able to gauge how much the wind project would harm, reduce, kill, or drive away each species of concern. Instead, WEST just lumps all birds in various "groups" categories together. Table 7 lists Shrikes, thrasher as "incidental".	Range maps for avian species are widely available and there would be no benefit to including these in the baseline resource reports or EIS. The avian use studies (WEST 2021a, 2023) employed point-count surveys to generally characterize temporal and spatial variation in avian use in the siting corridors and represent one of many sources considered in determining which species have the potential to occur in the siting corridors. Similarly, the results and conclusions presented in the avian use studies and other baseline resource reports were one on many sources considered when evaluating the potential for avian species to experience population-level impacts from collisions with operational turbines. Readers should refer to EIS Section 3.3.2 (Avian Populations) and Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) for a full description of avian species that may occur in the siting corridors and the analysis of potential impacts to their populations. Both avian use studies (WEST 2021a, 2023) include appendices with the data broken out for individual species. Loggerhead shrike and sage thrasher were reported as incidental observations in the year 2 avian use study (WEST 2023) because the second year of studies focused on large birds and did not include point-count surveys for small birds. Detailed used data for these two species (and other small birds) are included in the year 1 avian use study (WEST 2021a).
11871-104	WildLands Defense	Table 9 lists LBC. Why is there no mention of Brewer's Sparrow here?	Table 9 in the year 2 avian use study (WEST 2023) summarizes observations of avian species of concern (i.e., special-status species). Although the year 1 avian use study (WEST 2021a) correctly identified Brewer's sparrow as a BLM special-status species, this species is not included in the most recent list of BLM special-status species for Idaho, which was published in 2022, after the year 1 avian use study had been completed. Since the Brewer's sparrow no longer carries a special-status designation, it is not included in Table 9 of the year 2 avian use study (WEST 2023).
11871-105	WildLands Defense	An example of a negative association between wind energy development and raptors exists from the Columbia Plateau Ecoregion. Nest success of ferruginous hawk, red-tailed hawk, and Swainson's hawk was studied in relation to wind turbine density within their home range (Kolar and Bechard 2016). Nest success for ferruginous hawk decreased in areas with greater turbine density whereas there was no effect for red-tailed hawk and Swainson's	The results of the Kolar and Bechard (2015) study are discussed in the ferruginous hawk description in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail), which describes the potential for effects to breeding ferruginous hawks to result in population-level impacts. Red-tailed hawk and Swainson's hawk do not carry special-status designations in Idaho and thus do not meet the criteria for analysis in the EIS because their populations in the

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		hawk. Juvenile hawks of all three species from areas of greater turbine density were more likely to die from predation or starvation after fledging than those from areas with lower turbine density. Although the authors noted the cause of this negative association was unknown, they speculated it was some ..". Given there are no unoccupied habitats, this is a major concern also downplayed in the EIS, and the cumulative effects analysis is greatly deficient in identifying and assessing the full array of serious threats to species and populations.	analysis area are considered to be relatively large and stable. As noted in the comment, the Kolar and Bechard (2015) study found that red-tailed hawk and Swainson hawk nesting was less affected by wind turbine density than ferruginous hawk nesting. As described in EIS Section 3.3.2.1.1, other studies have also found these species to be at low risk of experiencing population declines from wind energy development (Conkling et al. 2022). EIS Section 3.3.2.1.2 describes the large increase in wind energy development that is expected to occur in the analysis area over the 30-year analysis period, including two other wind energy facilities proposed in close proximity to the project, and the increase in cumulative avian fatalities that is expected as a result. The analysis in EIS Section 3.3.2.2 (Avian Populations, Impacts) recognizes the inherently cumulative nature of avian fatalities from collisions with operational turbines and specifically discloses the potential for the species analyzed in detail to experience significant impacts from even a relatively small number of fatalities under the action alternatives when the impact of numerous facilities across the landscape is considered. Additional details are provided in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts).
11871-107	WildLands Defense	See: https://aeroecolab.com/radar-aeroecology https://aeroecolab.com/publications#publications-1 1. La Sorte, F. A., K. G. Horton, A. Johnston, D. Fink, and T. Auer. Seasonal associations with light pollution trends for nocturnally migrating bird populations. 2022. Ecosphere. 2. La Sorte, F. A., M. Aronson, C. Lepczyk, K. G. Horton, Assessing the combined threats of artificial light at night and air pollution for the world's nocturnally migrating birds. 2022. Global Ecology and Biogeography. 3. Dezfuli, A., K. G. Horton, B. Zuckerburg, S. D. Schubert, M. G. Bosilovich. Continental patterns of bird migration linked to climate variability. 2022. Bulletin of the American Meteorological Society. This information is all necessary and should have been collected and presented	In addition to the 2 years of avian use surveys, MVE conducted 2 years of raptor nest surveys, and 2 years of greater sage-grouse lek surveys (WEST 2020 through 2023). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." A number of other measures that would be implemented to minimize or avoid impacts to birds are described in EIS Section 3.3.2.2.2 and EIS Appendix 4 (Mitigation). This approach is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). Detailed studies of migratory routes in the analysis area are beyond the scope of the EIS. AIB-5 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) has been revised in the final EIS to include a description of impacts to migrating birds from nighttime lighting.
11871-116	WildLands Defense	And: "Despite the dearth of studies concerning the effects of WTN on wildlife, they have generated some insights that could contribute to understanding the ecological impact of WTN. In general, it has been shown that noise pollution affects species demography (i.e., community composition, population density) and promotes habitat avoidance (e.g. Refs. [1,29], because noise alters animals' habitat selection. Several studies have demonstrated the impact of WT on demography and habitat avoidance, mostly in birds (e.g. Refs. [37,38], but also in other taxa such as mammals [39]. Very few studies have been able isolate and connect habitat avoidance specifically to WTN (e.g. Ref. [40], but Lehnardt et al. (in review) recently teased apart the effects of WTN on songbirds experimentally, by broadcasting the sound of a wind turbine in the field and showing that this significantly reduced the number of birds present. Furthermore, the existing literature implies that WTN alters birds' vocal communication, with possible implications for reproductive success [30,41,42]".	As described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief), BLM (2005) discloses effects to habitat for avian species, including avoidance of habitats due to noise and human disturbance (see AIB-1). As described in EIS Section 3.3.2 (Avian Populations), most avian fatalities at existing U.S. wind energy facilities are small passerine species (i.e., songbirds), indicating that these species continue to use habitat at wind energy facilities despite noise from turbine operations.
11960-1	Roger and Liz Mandelkow	In response to a review of the EIS we would like to know how many endangered animals are you going to allow these wind turbines to injure or kill? In the EIS it specifically states that it will kill federally protected Bald Eagles that live in the area. If we injured or killed one Bald Eagle we would be held accountable. But yet LS Power / Magic Valley Energy will be held harmless? This is only the one species we are referencing from the EIS, but there are many more species of birds, eagles, and land-dwelling species that are going to be impacted and ultimately killed as well.	The MBTA and BGEPA prohibit the intentional take of migratory birds and eagles but do not impose the same level of restrictions for incidental take of these species resulting from otherwise lawful actions. MVE is pursuing an ITP, which is being evaluated in a separate NEPA analysis being conducted by the USFWS (see Section 3.3.3 [Eagles]). The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential for population-level effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." As stated in IAC 13.01.06 Section 300.02 "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management . . . " Two full years of avian use studies (WEST 2021a, 2023) were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, detailed studies of migratory routes are beyond the scope of this EIS. The greater sage-grouse is not listed as threatened or endangered under the ESA, but BLM 2015 provides a broad, landscape-level, national greater sage-grouse conservation strategy for the species. Greater sage-grouse were considered in the development of alternatives analyzed in the EIS and a number of mitigation measures would be implemented to minimize or avoid impacts to the species, including compensatory mitigation, in accordance with the mitigation framework in BLM 2015; see EIS Section 3.3.4 (Greater Sage-Grouse) and EIS Appendix 4 (Mitigation) for additional details.
11970-5	Janet Keegan	3.3.3 Eagles: It is my personal, non-scientific belief that the DEIS did not take a "hard look" as required by NEPA into protecting bats, birds, pollinators and other creatures great and small in considering the scope of this proposed project. I have one suggestion that should be studied for AFFECTED ENVIRONMENT AND IMPACTS FEIS and a requirement in the ROD. This information can be found on the Peregrine Fund's World Center for Birds of Prey. The BLM managed Morley Nelson Snake River Birds of Prey National Conservation Area was not mentioned and data did	While small buttes, rock outcroppings, and other topographic features are present in the siting corridors, none of these features are large or consistent enough to be of significant importance to migrating raptors. Raptor use in the siting corridors was evaluated over 2 years of avian use and raptor nest studies, which are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. Temporal variation in raptor use indicates that some of these species migrate through the siting corridors, but the relatively low numbers of raptors observed would

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		reach to that area in considering the Lava Ridge project. I feel that is a major oversight – as birds fly and migration can occur outside of nesting habitat. Automated monitoring for birds in flight: Proof of concept with eagles at a wind power facility - ScienceDirect	suggest that the siting corridors are not within an important migratory corridor for raptors. High raptor use at Morley Nelson Snake River Birds of Prey National Conservation Area is related to the presence of important habitat features such as large, steep cliffs that provide nesting habitat for raptors and create thermals used by migrating raptors. Unique soil and vegetation at this location also provides abundant habitat for important raptor prey resources such as ground squirrels and jackrabbits. A brief description of the NCA has been added to EIS Section 3.3.2.1 (Avian Populations, Affected Environment). Although raptors are capable of travelling the distance between the NCA and the siting corridors, the American Bird Conservancy's Wind Risk Assessment Map shows that the siting corridors are located outside of the intermountain raptor migration corridor, which supports the conclusion that raptor migratory movements are concentrated in the immediate vicinity of the Snake River, south of the siting corridors. The use of detector-based curtailment systems is discussed in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B).
11978-21	Magic Valley Energy, LLC	Section 3.3.2 – Avian Species Analysis ... 19. MVE Comment: The DEIS assumes that the annual avian fatality rate will be between the mean and maximum fatality rates within the BCR 9 Region. However, the DEIS also states that it "assumes avian fatalities from turbine collisions would have the same magnitude of impact on avian populations in BCR 9 regardless of where those fatalities occur in BCR 9." These two rationales are contradictory, as the DEIS cannot assume avian fatalities would have the same impact regardless of where they occur, and simultaneously eliminate the possibility of fatality rates being as low as other projects in BCR 9. An upward bias of estimated avian fatality rates is unwarranted since the Project area provides few avian use features and MVE's turbine siting practices avoid and minimize impacts, as stated in the DEIS: • There are no 'Important Bird Areas' designated in the siting corridors. • There are limited permanent water resources (namely canals, [which MVE has applicant- committed measures to avoid impacts to 1,000 feet of canals when possible]). • The siting corridors do not contain habitats that would concentrate migrating birds. • The siting corridors do not contain mountain ridges that would provide updrafts for migrating raptors. • Though in the Pacific Flyway, migratory routes in this flyway are concentrated along the Pacific coast and, to a lesser extent, the western slope of the Rocky Mountains. Migratory movements within Idaho are primarily east to west and concentrated along the Snake River, Salmon River, and Pend Oreille River corridors. • In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern. • Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). • Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project. The information provided above demonstrates that precluding the BCR 9 minimum estimated annual avian fatality rate as a possible outcome for the Project is unwarranted, and its inclusion should be added into the FEIS analysis. This inclusion of a minimum fatality rate would be in line with other FEIS documents from western states in the BCR 9 Region, which have projected minimum fatality estimates along with mean and maximum rates as part of their analyses (see Attachment 2 for examples). The minimum fatality estimate for BCR 9 is 0.24 birds/MW/yr and 0.01 raptor fatalities/MW/yr. Using these values as a basis, Table 3.3-5 could be updated to match the table below. [see table in PDF for easier reading, below slightly reformatted to capture intent of table better] Alternative B Bird fatalities from turbines (operation only) - - Minimum: All species: 288 - 492 birds per year - Minimum: Diurnal Raptors Only: 12 - 21 birds per year - Mean: All species: 3,240–5,654 birds per year - Mean: Diurnal raptors only: 156–272 birds per year - Maximum: All species: 10,200–17,799 birds per year - Maximum: Diurnal raptors only: 348–607 birds per year Bird fatality rate from turbines - - Minimum: All species: 0.24 birds per MW per year - Minimum: Diurnal raptors only: 0.01 diurnal raptors per MW per year - Mean: All species: 2.7 birds per MW per year - Mean: Diurnal raptors only: 0.13 diurnal raptors per MW per year - Maximum: All species: 8.5 birds per MW per year - Maximum: Diurnal raptors only: 0.29 diurnal raptors per MW per year Alternative C Bird fatalities from turbines (operation only) - - Minimum: All species: 273 - 373 birds per year - Minimum: Diurnal Raptors Only: 12 - 16 birds per year - Mean: All species: 3,062–4,196 birds per year - Mean: Diurnal raptors only: 147–202 birds per year - Maximum: All species: 9,639–13,209 birds per year - Maximum: Diurnal raptors only: 328–451 birds per year Bird fatality rate from turbines - - Same across action alternatives Alternative D Bird fatalities from turbines (operation only) - - Minimum: All species: 202 - 258 birds per year - Minimum: Diurnal Raptors Only: 9 - 11 birds per year - Mean: All species: 2,268–2,900 birds per year - Mean: Diurnal raptors only: 109–140 birds per year - Maximum: All species: 7,140–9,129 birds per year - Maximum: Diurnal raptors only: 244–311 birds per year Bird fatality rate from turbines - - Same across action alternatives Alternative E Bird fatalities from turbines (operation only) - - Minimum: All species: 194 - 280 birds per year - Minimum: Diurnal Raptors Only: 9 - 12 birds per year - Mean: All species: 2,179–3,143 birds per year - Mean: Diurnal raptors only: 105–151 birds per year - Maximum: All species: 6,860–9,894 birds per year - Maximum: Diurnal raptors only: 234–338 birds per year Bird fatality rate from turbines - - Same across action alternatives	See response to comment 11978-11 (in Table A-3b, Bats).
11978-164	Magic Valley Energy, LLC	20. MVE Comment: Four avian species (i.e., ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl) are analyzed in detail in Section 3.3 of the DEIS, as those species were perceived as potentially having a "moderate to high likelihood of population-level effects from the project." The DEIS sets forth three criteria, all of which must be met, to require a detailed analysis based on a moderate to high likelihood of population-level effects to the species due to the Project (referred to in this comment as "population-level effects concern criteria"); species not satisfying all three of these criteria were not analyzed further in the DEIS: "Therefore, the species analyzed in detail in this EIS meet all three of the following criteria: 1) The species has been observed in the siting corridors or has the potential to occur in the siting corridors because breeding, foraging, or migratory stopover habitat for the species is present and the species has been recorded in similar habitats within 4 miles of the siting corridors. 2) The species has a moderate to high potential of colliding with turbines based on if and how the species uses the RSH and the frequency with which the species been detected as fatalities at existing wind energy facilities. 3) The species has one or more demographic characteristics that make it susceptible to small increases in mortality; namely,	EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) describes how each of these species meet the criteria for detailed analysis.

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		they have a small and declining population in BCR 9, are long- lived, have a low reproductive rate, and are dependent on high annual survivorship to sustain their population." However, each of the four avian species analyzed in detail do not satisfy at least one of the three population-level effects threshold criteria, all three of which would need to be satisfied to trigger a detailed review to determine the likelihood of moderate-to-high population-level effects.	
11978-165	Magic Valley Energy, LLC	The DEIS reports that ferruginous hawks account for only 13 wind energy fatalities in the entire U.S., comprising just 0.1% of all recorded fatalities. Based on this data, it is reasonable to ascertain that the species does not have a moderate to high potential for collision, which is one of the population-level effects concern criteria (#2 above) stated in the DEIS for an avian species to potentially have population-level effects. Regarding the very low fatality percentage (0.1% of all recorded fatalities) comprised by ferruginous hawk, the DEIS speculates that "[t]his low percentage may be in part due to the non- random nature of the facilities included in the database, which is heavily skewed toward facilities in the Midwest and eastern United States that are outside the range of the ferruginous hawk." However, the Analysis of Avian and Bat Mortalities at Existing Wind Facilities (WEST 2021c in the DEIS) removes the need for speculation by quantifying that, based on publicly available fatality data, only three recorded ferruginous hawk fatalities occurred in BCR Region 9, with none of those fatalities occurring in Idaho. As such, the available data do not indicate that ferruginous hawk has a moderate to high potential for colliding with wind turbines. Additionally regarding ferruginous hawk sensitivity, the DEIS cites a Beston et al. 2016 report to support a statement that "[m]odeling indicates that collisions with turbines have a relatively large contribution to overall mortality for ferruginous hawks, and that the species is vulnerable to population-level effects from wind energy development." MVE's review of the Beston et al. 2016 report found that the statement "modeling indicates that collisions with turbines have a relatively large contribution to overall mortality for ferruginous hawks" misinterprets the contents of the report since the wind turbine collision contribution to overall mortality of the species (parameter called "FT in the report") was actually a model input parameter instead of an output parameter. Potential problems with the FT input parameter include, but may not be limited to, the following: 1) The FT parameter, calculated as the number of estimated fatalities caused by wind turbines, divided by the total population size multiplied by the quantity one minus the adult survival rate, tends to skew high for long-lived species such as ferruginous hawk since they have high adult survival rates. 2) The report seems to indicate that the number of estimated fatalities caused by wind turbines may not actually be based on species-specific fatality data. As the report explains, "[o]ther data limitations may also affect the output of our prioritization approach. In particular, FT would be better estimated with species-specific fatality data." Regarding the DEIS statement that ferruginous hawk "is vulnerable to population-level effects from wind energy development" based on the Beston et al. 2016 report, the model attempted to prioritize bird species based on their risk of population-level impacts from wind energy development. The model outputs scored the ferruginous hawk as the 18th-ranked avian species in terms of population risk due to wind development. In addition to the data associated with the FT parameter discussed above, the model calculated risk metrics based on data including the percent of a species population living near wind turbines, the number of female offspring per female annually, age at first reproduction, and the number of habitats a species uses. None of these parameters take into account important characteristics related to turbine fatality risk for a given species around a given wind energy facility, such as flight height, the amount of time a particular species spends in the rotor-swept area, species behavior, habitat type, presence and type of prey/food resources, weather variables, etc. As such, the results of the modeling in the report provide little to no information about the risk presented to a particular avian species by a particular wind energy facility in a particular location. The report acknowledges this shortcoming to a degree, stating, "[b]y examining studies on bird avoidance of operating facilities, it may be possible to filter out species with a high Indirect Risk Index that actually tolerate wind turbines well." Additionally, the report admits that "fatality from wind turbines was usually vanishingly small compared to overall estimates of fatality." Finally, the modeled risk to ferruginous hawk due to wind energy seems inconsistent with observed trends in recent years. In a period when wind energy capacity is increasing significantly, the American Bird Conservancy reports that the North American population of ferruginous hawk is approximately 110,000, with an increasing trend in population size.14 Given the information above, the available data do not support the notion that the ferruginous hawk species has a moderate to high potential of colliding with turbines. As such, ferruginous hawk does not meet all three population-level effects concern criteria as outlined in the DEIS; thus, per the analytical framework in the DEIS, population-level effects are not expected. As such, a detailed impacts analysis for ferruginous hawk is not necessary and should be removed in the FEIS. Consequentially, the additional measures in the FEIS related to ferruginous hawk would also be removed since the Project does not have the potential for population-level effects on the species, and ferruginous hawk would continue to be protected by the applicant-committed measures and adaptive management procedures detailed in the BBCS (MVE's POD Appendix M).	The conclusions in WEST 2021c are based on a study from a single existing wind energy facility in Idaho and only 23 facilities in BCR 9, these sample sizes are insufficient to establish that the ferruginous hawk has a low risk of colliding with turbines, especially considering their frequent use of the RSH of the proposed turbines. Even if collision risk were low, ferruginous hawk populations could be impacted by relatively low fatality rates because the species has a low reproductive rate and depends on high juvenile and adult survivorship and because their populations are already declining in much of the analysis area (see EIS Section 3.3.2.1.1 [Avian Populations, Species Analyzed in Detail]). Beston et al. (2016) used fatality data from 53 existing U.S. wind energy fatalities to estimate FT, and also attributed much of the risk to ferruginous hawks to the percentage of the population living in the vicinity of turbines, the low reproductive rate for the species, and the indirect effects of disturbance, displacement, and habitat fragmentation and loss. Other studies summarized in the description of ferruginous hawks in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) (i.e., Kolar and Bechard 2015 and Ng et al. 2020) also found evidence that wind energy development negatively impacts breeding ferruginous hawks. While the BLM recognizes that MVE has committed to a number of measures to minimize or avoid impacts to the ferruginous, these measures may not be sufficient to prevent population-level impacts to the species. The ferruginous hawk is a BLM special-status species and the BLM must ensure that the actions it authorizes do not contribute to a trend toward federal listing or loss of population viability for the ferruginous hawk; the BLM has additional obligations to reduce impacts to species protected under the MBTA as provided in their 2010 MOU with the USFWS, which was renewed for 5 years in February 2022 (BLM and USFWS 2022). Therefore, the BLM has developed additional mitigation measures that would be implemented to comply with these requirements; see Alternative B with Additional Measures in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), EIS Section 3.3.2.4 (Compensatory Mitigation), and EIS Appendix 4 (Mitigation).
11978-166	Magic Valley Energy, LLC	Regarding long-billed curlew, the DEIS describes that only 16 long-billed curlews were recorded during the Project area surveys, which MVE notes could have included multiple observations of the same individual during the course of multiple survey days. These observations do not support the notion of the Project area hosting population levels high enough to be deemed important habitat needed for sustaining populations. The total North American population of the species is 123,500, of which the Great Basin population is estimated at 40,000 per IDFG 2017. Also per IDFG data described in the DEIS, the highest concentrations of curlews in Idaho occur to the west of the area managed by the BLM Shoshone Field Office in the administrative boundary of the BLM Four Rivers Field Office. Importantly, the DEIS states that the long-billed curlew population in BCR 9 appears to be increasing. Based on the information above, the species does not have a small and declining population in BCR 9 and therefore does not satisfy the third population-level effects concern criteria listed above in this comment. Additionally, the DEIS explains that all long-billed curlew flights recorded during Project avian use surveys occurred below the rotor-swept height. This is consistent with the DEIS species description, which noted the curlew as having a 0.1% rate of all recorded avian-turbine collision fatalities (only 10 fatalities nationwide). Accordingly, the available data supports a conclusion that the long-billed	The potential for significant impacts to long-billed curlew cannot be ruled out for the same reasons described for ferruginous hawk in the response to comment 11978-165 (see in Table A-3c, Birds); see EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) for additional details. The playas and vernal pools in the siting corridors were not inundated during the avian use surveys (WEST 2021a, 2023) and it is possible that long-billed curlew use could be higher during wet years. As described for ferruginous hawk, the BLM must develop additional mitigation measures to meet its special-status species management and MBTA obligations.

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		curlew does not have a moderate to high potential for colliding with turbines. Since the species does not meet does not meet two of the three population-level effects concern criteria as outlined in the DEIS, per the analytical framework in the DEIS, population-level effects would not be expected, and a detailed impacts analysis for long-billed curlew is not necessary and should be removed in the FEIS. The species would continue to be protected by the applicant- committed measures and adaptive management procedures detailed in the BBCS (POD Appendix M).	
11978-167	Magic Valley Energy, LLC	Similarly, the short-eared owl and western burrowing owl have extremely low collision rates (0.2% and 0.1%, respectively, of all historical U.S. recorded fatalities at wind facilities) due to their low flight height, which is below the Project's RSH and the RSH of most other wind projects. The Altamont Pass Wind Project is one project where the RSH overlapped with the flight height of the two species, which correlates to the increased fatality rates recorded there. However, this data point is an outlier and should not be used in the DEIS analysis because the RSH at the Altamont Pass Wind Project is inapplicable to the model of wind turbines used today and is not bound to the design stipulations MVE has committed to for this Project. Thus, these species do not have a moderate to high potential of colliding with turbines, so the short-eared owl and western burrowing owl do not meet the population-level effects concern criteria #2. Accordingly, per the analytical framework in the DEIS, population-level effects to the species are not expected, and a detailed impacts analysis for short-eared owl and western burrowing owl is not necessary and should be removed in the FEIS. These species would continue to be protected by the applicant- committed measures and adaptive management procedures detailed in the BBCS (POD Appendix M).	Although frequent RSH use by short-eared owls and burrowing owls was not observed during the avian use surveys (WEST 2021a, 2023), these surveys were not designed to detect owls and may underestimate use of the siting corridors and use of the RSH by both species. As noted for short-eared owl, flights within the RSH have been recorded elsewhere and males are at particular risk when engaging in mating displays. The EIS also acknowledges that the older, lattice-tower turbines at Altamont Pass are the most likely explanation for higher fatality rates for burrowing owls observed at this facility, but the possibility that fatality rates may be higher where burrowing owls nest (such as the siting corridors) cannot be ruled out. Refer to EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) for additional details.
11978-168	Magic Valley Energy, LLC	Given the information presented above, all four species analyzed in detail in the DEIS do not meet the population-level effects concern criteria that would indicate the potential for population-level effects. Further, MVE has applicant-committed measures for avoiding and minimizing impacts (e.g., avoiding riparian areas where practical, siting turbines away from previously occupied raptor nests, removing carcasses within the Project area, and completing pre- and postconstruction surveys with applicable mitigation measures and potential adaptive management strategies) that would further reduce the impacts to all avian species. Ferruginous hawk, long-billed curlew, short- eared owl, and western burrowing owl should therefore be removed as species analyzed in detail in instead be added to Appendix 3 of the FEIS as Issues Analyzed In Brief.	A species' risk of experiencing population-level impacts is a function of 1) its demographic characteristics (e.g., population size, trend, and reproductive rate), and 2) its behavior (which determines its likelihood of colliding with operational turbines), which are factors independent of any avoidance or minimization measures that MVE or the BLM would implement. Rather, mitigation measures have been developed to address the potential impacts to species that are at risk of experiencing population-level impacts.
11991-9	Julie Abo	The avian fatalities seem very excessive for BLM-favored Alternatives C and E: "Alternative C 3,062-4,196 fatalities from collisions wth turbines. 9,639-13,209 (max) birds per year. Alternative E Avian populaations fatalities: 2, 268-2,900 to maximum 7, 140-9,129 birds per year (Page ESxv)" According to a study: Conkling TJ, et al.. 2022. Vulnerability of avian populations to renewable energy production. FigShare, avian surveys tend to focus on local groupings of birds. Were the avian surveys done only locally focused? If so, then as this research shows, does As the authors of this recent research show: "Our results illustrate that such locally focused surveys may poorly predict the cumulative impacts of fatalities. This study, therefore, emphasizes the importance of assessing the origins of wildlife affected when interpreting consequences to wildlife populations of these, or any, types of anthropogenic activities."	The draft EIS did not identify a BLM-preferred alternative. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) the estimated avian fatality rates in EIS Table 3.3-12 are not intended to be precise estimates but are presented to allow for a meaningful comparison between alternatives. The fatality rates presented in Table 3.3-12 also do not account for the implementation of mitigation measures (a table note has been added to this effect in the final EIS). As stated in EIS Section 3.3.2 (Avian Populations),"[BCR 9 (i.e., the analysis area)] is an ecologically distinct region with similar bird communities, habitats, and resource management issues (North American Bird Conservation Initiative 2021). BCRs provide an ecological approach to capturing regional variation in bird occupancy and useful spatial units over which to examine changes in population. Data on avian fatality rates and installed wind capacity are also available at the BCR level, which allows for a more informed estimation of the avian fatality rates that could be expected under the action alternatives, and the relative contribution of those fatalities to the overall impact on regional avian populations." As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), in accordance with the USFWS (2012) guidelines, MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]), and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." While many species that may occur in the siting corridors likely travel beyond BCR 9 during migration, studies of the geographic origins of birds using the siting corridors are beyond the scope of this EIS but are included as potential adaptive management or compensatory mitigation for avian and bat species; see the BBCS and EIS Appendix 4 (Mitigation) for additional details.
12054-12	Kevin Emmerich	The noise from the turbines will impact eagles. The acoustic environment has a major influence in shaping animal behavior. A growing number of studies quantify the impact of nonlethal human disturbance on the behavior and reproductive success of animals. Most researchers agree that noise can effect an animal's physiology and behavior, and if it becomes a chronic stress, noise can be injurious to an animal's energy budget, reproductive success and long-term survival. In draft guidelines for human disturbance of breeding golden eagles, Hansen et al. (2017) state that ground disturbance and noise can be more significant than aerial noise to raptors: "In general, animals appear to be more responsive to louder sounds than to quieter ones (Bowles 1995). For example, Mexican spotted owls only flushed in response to helicopters and chainsaws when sound energy was above certain levels (chainsaws: 46 dBA, helicopters: 92 dBA; Delaney et al. 1999). Awbry and Bowles (1990:21 cited in USFWS 2006) stated that "what little published literature (on raptors) is available suggests that noise begins to disturb most birds at around 80–85 decibels (dB) sound levels and that the threshold for the flight response is around 95 dB." The Service (USFWS 2006) noted in its review of effects of human disturbance on northern spotted owls that raptors tend to be more sensitive to visual disturbances than to auditory ones. However, auditory and visual stimuli from human activities may often interact synergistically in their effects on wildlife (USFWS 2006). This synergistic effect could be responsible for findings that raptors are often more strongly affected by terrestrial activities than aerial activities (USFWS 2006; e.g., Fraser et al. 1985, Delaney et al. 1999, Grubb et al. 2010). The Service (USFWS 2006) recommended an injury threshold for northern spotted owls of 46 dBA for terrestrial activities due to the potential for stronger effects of ground-based activities than of aerial activities."	Impacts to eagles and other avian species from construction noise and turbine noise are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-2. Additional discussion is provided for eagles in EIS Section 3.3.3.2 (Eagles, Impacts).
12130-24	Brenda Pace	BBCS Section 3.1 (and DEIS Section 3.3.2.1.1) describes preconstruction surveys completed for birds. I am concerned that the raptor nest surveys completed were not designed to detect ground nesting raptors such as	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), preconstruction avian use is not correlated with postconstruction fatality rates; therefore, conducting additional studies of current avian use in the siting corridors

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		burrowing owls and short-eared owls. Additional preconstruction surveys should be conducted for ground nesting raptors.	would not lead to a more informed analysis. Postconstruction monitoring would be implemented to assess avian fatality rates and determine if adaptive management measures are needed to reduce fatalities.
12160-1	Richard Walsworth	The poor birds in the region will be massacred. According to the EIS approx. 15 golden eagles will be killed per year and before the 30 year lifetime of these windmills are over all the golden eagles in the region will be dead. If I killed even one golden eagle I would most likely get jail time and a large fine. How about the endangered sage hen, the tens of thousands of migrating birds and the large variety of birds of prey and songbirds that live on the Snake River Plain that will die each year. I think the flight patterns of these birds have not been adequately studied for the huge impact the windmills could have killing birds. I hunt doves in this area every year and know first hand many doves migrate through the project area.	The MBTA and BGEPA prohibit the intentional take of migratory birds and eagles but do not impose the same level of restrictions for incidental take of these species resulting from otherwise lawful actions. MVE is pursuing an ITP, which is being evaluated in a separate NEPA analysis being conducted by the USFWS (see Section 3.3.3 [Eagles]). The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tier 4 and 5). MVE has conducted Tier 1–3 studies, has a draft BBCS (Appendix M in MVE [2023]) in accordance with the USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential for population-level effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities." As stated in IAC 13.01.06 Section 300.02 "Protected nongame status is not intended to prevent unintentional take of these species, protection of personal health or safety, [or] limit property and building management . . ." Two full years of avian use studies (WEST 2021a, 2023) were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, detailed studies of migratory routes are beyond the scope of this EIS. The greater sage-grouse is not listed as threatened or endangered under the ESA, but BLM 2015 provides a broad, landscape-level, national greater sage-grouse conservation strategy for the species. Greater sage-grouse were considered in the development of alternatives analyzed in the EIS and a number of mitigation measures would be implemented to minimize or avoid impacts to the species, including compensatory mitigation, in accordance with the mitigation framework in BLM 2015; see EIS Section 3.3.4 (Greater Sage-Grouse) and EIS Appendix 4 (Mitigation) for additional details.
12469-9	Mike Telford	In our modern world we are surrounded by and governed by Models. Models are a way of predicting future events and numbers by using know facts and data and putting them into sometimes complicated equations. An algorithm is defined as " a process or set of rules to be followed in calculations or other problem solving operations, especially by a computer". Models are used from everything from future trading, to the weather. One profession modeler recently told me that " all models are wrong, but some are useful". All model's accuracy is mostly governed by the historical data and numbers put into them. They are all tested by then seeing what really happens and then comparing that real world result to what the model said was going to happen. Then the model uses those real result to attempt to fine tune the model to better predict outcomes... The DEIS has used models to try and predict Bird kills by the wind turbine. The DEIS is obvious that they have used very scarce data to model not only the impacts but the data if the birds numbers and location are all model created numbers. There is no complete study of the area of the bird population or the fact that in the last 50 years those population are declining. It is impossible in good faith to model anything with out good data... As the habitat is altered by all this destructive activity (the 380 plus miles of roads as just one) and food chain disruptions occur the modeling cannot be relied upon... The populations of water fowl changes dramatically depending on the winter precipitation that comes each year. In the wetter years as the spring thaw occurs, ponds both large and small occur. One of the largest noted on all the old BLM maps, is Senter lake, which is located on our farm. These Ponds last from a few weeks to a couple of months. They attract large numbers of water fowl. Many types of ducks, swans, snow geese, Canadian geese and occasionally pelicans. Experts could surely identify more detail. These are relatively lower flying. Therefore, more subject to windmill kills. The DEIS does not address this special influx population and the impacts The single most overwhelming factor is the project proposes 6MV wind turbines larger (740ft) than any constructed or in operation. Any impacts from something this large and untested, may be called a model but is only a guess or extrapolation. The is no running prototype to measure impacts and gathered data. In the DEIS Executive Summary there are 24 resource issues listed. None of them consider the lack of data concerning 6MV wind turbines and there impacts to everything. Fourteen of these resource issues are about living things. All these rely on modeling. Most of these have little or no real data and are subject to models, that as good as they maybe, can also be grossly inaccurate. Each creature, whether a humble insect or pollinator, a rodent, bat, or a predator is part of an ecosystem. All reliant in someway on the whole.	As described EIS Section 3.3.2. (Avian Populations), no widely accepted method exists for predicting postconstruction avian fatalities from preconstruction use data, and the avian fatality rates presented in Table 3.3-12 are not intended to be precise estimates but are provided to allow for a meaningful comparison between alternatives. The estimated fatality rates in this table also do not account for the implementation of mitigation measures, which are expected to substantially reduce fatalities. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "available data from existing wind farms . . . had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the Lava Ridge Wind Project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the Lava Ridge Wind Project." While it is likely that newer, larger turbines are underrepresented in the available data on bat fatality rates at existing U.S. wind energy facilities, there is currently no established relationship between bat fatalities and turbine height or rotor-swept area. Due the variability in fatality rates between sites and species, the EIS individually assessed special-status avian species for their risk of experiencing population-level impacts from collisions with operational turbines under the action alternatives. Four species (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl) were determined to have a moderate to high risk of population-level impacts and are analyzed in detail in EIS Section 3.3.2. Species that were determined to be at low risk of population-level effects, including the American white pelican and several waterfowl and shorebird species, are analyzed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). EIS Section 3.3.2.1 discloses the potential for waterfowl and shorebird use of the siting corridors to be higher in particularly wet years when playas and vernal pools are inundated. Pelicans and other waterfowl have rarely been recorded as fatalities at existing U.S. wind energy facilities and have a low risk of colliding with operational turbines; thus, few fatalities would be expected under any of the action alternatives; see Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Impacts to avian habitat are addressed in Table App3-1 in EIS Appendix 3; see AIB-1.
12988-2	Melody Asher	DEIS 3.3.2.1 AFFECTED ENVIRONMENT I don't think that the affected areas environment (& what species may be impacted) was looked at close enough. The Milner-Gooding Recharge Site, Star Lake and all the ephemeral ponds, playas and lakes are very important for waterfowl during migration and in late winter and spring and very important for shorebirds mainly in the spring migration. We saw 60 Tundra Swans, multiple waterfowl species, mountain bluebirds (our state bird I} and multiple songbirds in addition to eagles and hawks that are in the area most of the year. This happened when much of the water was already gone at the recharge site and I expect many more numbers and species would most likely have been there a little earlier in the spring when the lakes were larger.	Two full years of avian use studies were conducted to evaluate temporal and spatial variation in avian use in the siting corridors, including seasonal variation in diurnal raptor use. The results of the first year of avian use surveys are summarized in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9 and in EIS Table 3.3-7. Detailed data from the first year of avian use studies are presented in the Avian use study (WEST 2021a), which was made available on the BLM project website during the draft EIS comment period; a link to the study is included in Section 3.3.2.1.1 (Avian Use in the Siting Corridors) in EIS Appendix 9. The results of the second year of avian use studies were not available prior to the publication of the draft EIS but have been incorporated into the final EIS. The results of both years of raptor nest surveys were also summarized in this section (see also Table 3.3-10). Section 3.3.2.1 (Avian Populations, Affected Environment) also discloses the potential for ephemeral surface water features in the siting corridors (i.e., playas and vernal pools) to provide migratory stopover habitat for waterfowl and other avian species when inundated.
12988-3	Melody Asher	DEIS 3.3.2.1.1 AVIAN USE IN THE SITING CORRIDORS Your DEIS data showed - "48 bird species were recorded during project avian use	As described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail), to comply with 40 CFR 1502.2(b) this EIS "has only [a] brief discussion of other than significant issues" and focuses on species with a

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		surveys (WEST 2021a); an additional 24 bird species have been identified within 4 miles of the siting corridors (IDFG 2020).' We saw over 50 species on JUST ONE DAY very recently and most of the migrating songbirds, shorebirds, and summer breeding birds have not migrated here yet. I think you need to study this more.	moderate to high likelihood of population-level effects from turbine collisions. While many other species occur in the siting corridors, they do not meet the criteria for detailed analysis in the EIS described in this section.
12988-4	Melody Asher	Your DEIS says "Large diurnal raptors are generally considered to be at the greatest risk of population-level effects from turbine collisions (AWWI 2016; Choi et al. 2020; Erickson et al. 2014; Watson et al. 2018)" Ferruginous Hawk Your DEIS says "No ferruginous hawks were recorded during the winter (WEST 2021a)." This needs to be looked at more closely. It is not far to a roost that I personally have seen 20 or more Ferruginous Hawks (FEHA) all at one time and they roost there regularly. We have more FEHA here in the winter than any other season. They are a long-lived species which makes them more vulnerable. More study on the FEHA use and on the impacts on Buteos (including FEHA) needs to be done. I don't want to see even less numbers of FEHA in Idaho.	Although ferruginous hawk use was not observed in the siting corridors during winter in the first year of avian use studies (WEST 2021a), two ferruginous hawks were recorded in winter of the second year of avian use studies (WEST 2023). EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) has been updated with the information form the second year of avian use studies. This section also discloses the presence of a small over-wintering population of ferruginous hawks in southern Idaho based on the information in IDFGs SWAP (IDFG 2017). The ferruginous hawk's long lifespan and low reproductive contributed to the decision to analyze this species in detail in the EIS and develop additional mitigation measures to ensure that the action alternatives do not adversely impact the species population in BCR 9; see EIS Section 3.3.2.2 (Avian Populations, Impacts) and EIS Appendix 4 (Mitigation).
12988-5	Melody Asher	Long-Billed Curlew Your DEIS says "Alternative B could result in more long-billed curlew fatalities than the other action alternatives because it would have the most bird fatalities overall. Although the available data suggest that few long-billed curlew fatalities would occur, few of the facilities studied are within the long-billed curlew's breeding range and, for this reason, more fatalities could occur than expected. Considering that Idaho supports as much as 31% of the long-billed curlew population in BCR 9 (American Bird Conservancy 2013) and that the species may use siting corridors during spring migration (when juveniles and subadults disperse to new territories), fatalities resulting from collision with operational turbines could adversely affect the long-billed curlew population in BCR 9. This would especially apply when the impact of numerous facilities across the landscape is considered (see Section 3.3.2.2.6 [Cumulative Impacts])." We saw almost 40 Long-Billed Curlew (LBCU) on this one day. They are definitely in the area and are a Tier 2 Greatest Conservation Need, Type 2 BLM Sensitive Species and they need protected and more loss of habitat would be detrimental.	See EIS Appendix 4 (Mitigation) for a description of mitigation measures; as described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), MVE would complete a minimum of 2 years of postconstruction monitoring (applicant-committed measure 150 in Appendix 4) to assess the actual long-billed curlew fatality rate and to determine which adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce long-billed curlew fatalities, if any.
12988-6	Melody Asher	Short-Eared Owl Your DEIS says "Alternative B could result in more short-eared owl fatalities than the other action alternatives because it would have the most bird fatalities overall. Although short-eared owl fatalities are relatively uncommon at existing U.S. wind energy facilities, breeding males may be susceptible to turbine collisions when engaging in mating displays. Given that project raptor nest and avian use surveys were not designed to assess short-eared owl use or nesting, the species is likely underrepresented in the project survey data, and short-eared owl use and nesting in the siting corridors may be higher than the data suggest; thus, more fatalities may occur than expected. Because the short-eared owl population in BCR 9 is small and declining, the possibility that fatalities from collision with operational turbines could adversely affect their population in BCR 9 cannot be ruled out. This would especially apply when the impact of numerous facilities across the landscape is considered (see Section 3.3.2.2.6 [Cumulative Impacts])." After looking around the other day and having done Short-Eared Owls (SEOW) surveys along Highway 24 in the area (and SEOW are present) I would encourage more study. I really would not like to see SEOW numbers go even lower in our area.	Because the avian use surveys (WEST 2021a, 2023) did not target owls, mitigation measures for short-eared owls were modified and expanded in the final EIS; these include preconstruction surveys for short-eared owl nests and avoidance buffers for active nests. Additionally, MVE would complete a minimum of 2 years of postconstruction monitoring (applicant-committed measure 150 in Appendix 4) to assess the actual short-eared owl fatality rate and, if high fatality rates are observed, to determine which adaptive management measures in the BBCS (applicant-committed measure 157) need to be implemented to reduce short-eared owl fatalities. Additional monitoring would be required to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the USFWS Land-based Wind Energy Guidelines (USFWS 2012).
12988-9	Melody Asher	DEIS Table 3.3-3 {page 3-66) Summary of Vear 1 Avian Use Studies I did not see a section on sagebrush obligates except this table (& maybe these species that I am listing are not totally sagebrush obligates but they are all very dependent on sagebrush steppe habitat). This loss of habitat (mainly will impact many sagebrush obligates: Sage Thrasher, Sagebrush Sparrow, Savannah Sparrow, & Brewer's Sparrow (an especially sensitive species). I am probably forgetting some species. There are other species that use sagebrush heavily: Loggerhead Shrike, Northern Shrike, Mountain Bluebirds, Long-Billed Curlew, Red-Tailed Hawk, Prairie Falcon, Gray Flycatcher, White-Crowned Sparrow, and Vesper Sparrow. As far as I could tell these bird species were not given much consideration in the DEIS. We (BLM) has spent money on prescribed fires that are for brewer's sparrows so I think that we should at least study the use for more than one year.	Impacts to avian habitat are analyzed in brief Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1. See Table App3-3 in EIS Appendix 3 for avian species analyzed in brief.
13008-7	Scott Hauser	Section 2.3 of Appendix M, Aquatic Resources states, "There are no Important Bird Areas (IBA) within the Project area; however, Craters of the Moon National Monument and Preserve occurs in northern Lincoln and Minidoka counties, approximately nine miles from the Project area. This IBA is designated as globally important due to its high diversity of birds and high-quality migrating, breeding, and wintering habitat." This is a concerning statement for many reasons. First, many areas that are ideal for wind energy development are also ideal migratory corridors for bird migration. Wind power and bird migratory corridors both rely on wind. The suggestion that nine miles is adequate is concerning. Nine miles is an extremely small distance when considering that bird migration often covers thousands of miles. Though the project area is not listed as an important bird area, bird migration is considered extremely important and should be adequately addressed, especially when the construction of wind turbines has the potential to impact migratory species.	A description of the CRMO IBA had been added to EIS Section 3.3.2.1 (Avian Populations, Affected Environment). The analysis area for impacts to avian populations is BCR 9, which includes the CRMO IBA. Therefore, the effects described in Section 3.3.2.2 (Avian Populations, Impacts) account for effects to avian populations that use the CRMO IBA. Additional quantitative analysis of impacts to local avian populations is not possible due to the lack of publicly available scientific data.
13008-8	Scott Hauser	Table 7 in Appendix M is misleading. The numbers in this table are quite low. Lava Ridge has the potential of killing as many as 13,250 birds per year, though the average will likely be somewhere between 2,736 and 3,648. The table should reflect estimates for Lava Ridge rather than ratios that are misleading.	Table 7 of the BBCS (Appendix M in MVE [2023]) presents a summary of fatality rates observed at existing U.S. wind energy facilities in the Renew Database. Estimated avian fatality rates by alternative are presented in EIS Table 3.3-12.
13008-9	Scott Hauser	Additionally, pertaining to bird fatalities in section 6.3, the long-term monitoring states that a bird fatality rate will be established. However, it is unclear what the next steps are. There is considerable discussion on conservation of Eagles (Appendix T) and Greater Sage-grouse (Appendix U), but little consideration is given to bats and other bird	Section 6.3 of the BBCS (Appendix M in MVE [2023]) describes long-term monitoring, in the form of a Wildlife Incidental Reporting Strategy, that would be implemented in addition to the postconstruction fatality monitoring

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		species that frequent that area. Can BLM provide details on what are the next steps if the project is determined to have a high bird fatality rate? There needs to be further discussion or consideration for other bird species and bats.	studies described in Section 6.1 of the BBCS. See EIS Appendix 4 (Mitigation) for a complete description of mitigation including postconstruction fatality monitoring and adaptive management measures.
13008-17	Scott Hauser	Further, construction operations lead to multiple impacts on birds and other wildlife. For instance, most birds are highly sensitive to noise and light pollution. Other species development, reproduction, and migrations can be altered by light pollution at night. It is highly concerning that these impacts are inadequately addressed in the DEIS.	Impacts to avian species from noise are analyzed in brief in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-2; impacts to avian species from project lighting are described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) and EIS Appendix 3; see AIB-5.
13011-2	Ron Yates	The EIS does not assign accountability to the Lessee in fines, (dollars) or an order mandating restoration for the death of birds of prey, that are residents to the area or those which may be migrating, migratory waterfowl or resident birds without hunting seasons. A 5-16-2013 news article relating to wind turbines in Converse County, Wyoming is attached. The article lists a number of birds known to be killed by wind turbines at the time. Today, 10 years later, where is the nationwide accountability? Habitat within the proposed Lava Ridge area presently has a balance of prey and birds of prey, any loss of eagles, hawks or owls will be difficult to replace. How will the BLM assess fines to the Lessee? How will the BLM require the Lessee to prevent the death of birds by their wind turbines?	See EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) for a discussion of mitigation measures that would be implemented to minimize or avoid impacts to avian species; potential compensatory mitigation measures are described in EIS Appendix 4 (Compensatory Mitigation Actions in the Mitigation Framework for Birds and Bats).
13012-8	Heather Saunders	My concerns regarding the actual operation of the turbines follow along the usual lines. Bird strikes is a big one, but only because we have so many raptors. I realize the claim is that wind turbines are usually hit by smaller birds flying in flocks. But I live less than 10 miles from the northern portion of that site and I can tell you for a fact that we have hundreds of raptors everywhere. I've seen as many as 50 hawks at a time hunting a field for mice. The hawks, falcons and eagles have raptor parties over my farm the second week of every September; we'll have as many as 30 birds in the air doing touch-n-go maneuvers in the trees. In the winter it's Great Horned Owls; they like to take over the hawk nest when the hawks aren't using it. And it's not just raptors. I spent the past few weeks also watching huge flocks of migrating swans flying over Richfield. And I happen to be aware of a seasonal pond located on Deadman's Curve (about mile marker 175 on US26/US93) very close to the northern end of the Lava Ridge area that attracts large flocks of migrating swans every spring. I already know what a turbine can do to a swan, but how big a bird hit does it take to damage a turbine?	As described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail), large diurnal raptors are generally considered to be at the greatest risk of collisions with operational turbines. The EIS individually assessed special-status avian species for their risk of experiencing population-level impacts from collisions with operational turbines under the action alternatives. Four species (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl) were determined to have a moderate to high risk of population-level impacts and are analyzed in detail in EIS Section 3.3.2. Species that were determined to be at low risk of population-level effects, including the trumpeter swan and several other large waterfowl, are analyzed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Great horned owls are not addressed in the EIS because the species does not carry a special-status designation in Idaho, and thus, is considered to have a relatively large and stable population that is unlikely to be impacted by fatalities from collisions with operational turbines. See EIS Section 3.3.2.1 (Avian Populations, Affected Environment) for a summary of MVE's avian use studies (WEST 2021a, 2023); the final EIS has been updated to include the results of the second year of study. This section also describes the presence of surface waters that may be important to migrating birds in the vicinity of the siting corridors and discloses the potential for ephemeral surface water features in the siting corridors (i.e., playas and vernal pools) to provide migratory stopover habitat for waterfowl and other avian species when inundated. The final EIS has been revised to describe how measures to avoid or minimize impacts to surface waters, including intermittent and ephemeral features, would indirectly benefit avian species. Wind turbine failures are typically the result of operational error, structural damage, lightning damage, manufacturing, defects, and fires. While bird strikes can damage wind turbines, relatively few wind turbine failures are attributed surface damage, and most surface damage is caused by long-term wind and rain erosion (Mishnaevsky 2022). Mishnaevsky, L. 2022. Root causes and mechanisms of failure of wind turbine blades: overview. Materials 2022(15):2959–2987.
1618-4	Brian Olmstead	The EIS is severely deficient in impacts to ducks and geese. The Milner Gooding Canal has been one of my favorite duck hunting areas for over 50 years. Will they like the turbines, No! Will they be killed by the turbines, Yes. Do ducks and Geese fly in bad weather and at night, Yes! Will they respect the zones they should not fly through? No! Will the flashing lights confuse and disorient them? Yes! If the lights are turned off at night will the Geese see and avoid the killing blades? All these concerns also apply to hawks, owls, hummingbirds, swans, etc. As a member of the Idaho Water Resource Board I drive out to the Mile Post 31 and 29 recharge sites at least a couple of times each year. Beautiful managed lake/wetlands that Idaho built with great cooperation from you at BLM. I have personally seen and can send you pictures of hundreds of waterfowl including protected swans on those lakes. They also are not adequately addressed in the DEIS. In my opinion, all of these impacts to avian species are glossed over by all of the documents LS Power has submitted.	The analysis in EIS Section 3.3.2 (Avian Populations) focuses on those species with a demonstrated risk of significant effects from wind energy development in the region, as described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail). Additional species-specific analysis is provided in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief).
2097-1	Susan DeCamp	How are you adapting the wind turbines to avoid killing birds? To be sustainable - the project must mitigate bird losses by utilizing the latest radar and other technologies. The investment will be well worth it - with many endangered species relying on open land in Idaho, Montana and Washington. Bald eagles migrate through this area every year. Hundreds of thousands of birds are killed by wind turbines annually. It's time to make the turbines safe and sustainable for all God's creatures.	EIS Section 3.3.2.2.2 (Avian Populations, Alternative B) describes the measures that would be implemented to minimize or avoid impacts to avian populations from turbine collisions. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
2314-3	Mike Tylka	Bats and birds. The desert ecosystem is very fragile. Bats and birds continue to be a significant part of this overall ecosystem and it is impossible to predict how many of these creatures will be killed due to the construction taking place and the turbine system after operation begins. Therefore, why risk sacrificing any of the identified or non-identified species? The mortality rate of avian species around existing wind turbines has historically proven to be very high. Especially endangered birds are raptors, which typically soar in that area.	As stated in the analysis assumptions in EIS Section 3.3.2 (Avian Populations), "Although the avian use surveys (WEST 2021a, 2023) were used to determine the species that may be present in the siting corridors and their seasons of use, the risk of fatalities from turbine collisions varies among species due to factors such as flight characteristics, type of prey, and habitat use. Thus, avian use observed prior to construction may not correlate directly to fatality rates after construction (WEST 2011). Given this, the species composition of fatalities observed at other western United States wind facilities was considered when determining collision likelihood and the magnitude of the effect on each species' population." Similar assumptions are described for bats in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). As described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail), large diurnal raptors are generally considered to be at the greatest risk of collisions with operational turbines. The EIS individually assessed special-status avian species for their risk of experiencing population-level impacts from turbine collisions. Four species (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl) were determined to have a moderate to high risk of population-level impacts and are analyzed in detail in EIS Section 3.3.2. Species that were determined to be at low risk of population-level effects are analyzed in Table App3-3 in EIS

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			Appendix 3 (Issues Analyzed in Brief). Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian and bat fatality monitoring to assess fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).
2695-1	Jill Mckay	Did the EIS address the impact of project to local and migratory birds?? This must be addressed.	See EIS Section 3.3.2 (Avian Populations) for a discussion of potential impacts to avian populations, additional analysis is provided in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief); eagles are discussed in Section 3.3.3 (Eagles) and greater sage-grouse are discussed in Section 3.3.4 (Greater Sage-Grouse).
2915-2	Roger Twitchell	My primary criticism of the analysis of impacts to avian species is that the studies referenced cover a very short period of time, from about 2014 to 2022. The DEIS does not set a historic context for current populations/numbers. Large fluctuations in avian populations take place over long periods of time, several decades at least. These fluctuations, population booms and busts are probably normal. But if new threats such as wind turbines, maybe west-wide, are placed in nesting habitat, migration ways and seasonal gathering areas during low or "normal" population periods then one more barrier is placed on any population increase. Do so called normal, average or recently observed population levels depend on the periodic booms or apex numbers to sustain a species? Swainson's hawks periodically gather in the Mud Lake area, sometimes in large numbers. This is in relatively close proximity to the MVE project area. I see no treatment of the Swainson's hawk in the DEIS or appendices. Neither do I see any treatment of Prairie falcons or Arctic owls. If they have never been observed in or near the project area it should be so stated.	As described in the list of data sources in EIS Section 3.3.2 (Avian Populations), the primary sources considered in determining past trends and the current status of avian populations are Partners in Flight (2022) and Sauer et al. (2019). Both of these databases use data collected by The North American Breeding Bird Survey program, which is a continent-wide program that has been collecting data on avian populations since 1966. In addition to MVE's avian use studies (WEST 2021a, 2023), the BLM also reviewed data from IDFG and publicly reported observations on eBird (2024) to identify avian species with the potential to occur in the siting corridors. Swainson's hawk is briefly discussed in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) but did not meet the criteria for detailed analysis in EIS Section 3.3.2.2 (Avian Populations, Impacts) or abbreviated analysis in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) because it does not carry a special-status designation in Idaho, and thus, is considered to have a relatively large and stable population that is unlikely to be impacted by fatalities from collisions with operational turbines. The prairie falcon is excluded from the EIS due its lack of a special-status designation in Idaho. The snowy owl was not included in Table App3-3 because of the lack of confirmed records within the siting corridors and immediate vicinity, this species has been added to Table App3-3 in the final EIS.
2926-1	Mark Southwick	SWAC Environmental Consultants did not include our property in their aviary study, but offer general research losses and impact from outside data sources. Are the Swainson's Hawks and Owls we enjoy being overlooked and a part of the acceptable losses put forth in the Environmental Impact Study?	See EIS Section 3.3.2.2 (Avian Populations, Impacts) for a discussion of potential impacts to the short-eared owl and western burrowing owl; avian species analyzed in brief, including the flammulated owl, can be found in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). As described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail)." Relatively large increases in mortality (as many as 5,000 additional deaths per year) do not appear to threaten the range-wide populations of raptors with larger, more stable populations such as red-tailed hawk and Swainson's hawk, and smaller, local populations (i.e., within a BCR) may not experience population-level effects from this level of mortality either (Conkling et al. 2022)."
2939-2	George Solverson	Furthermore, the dismissive conclusion that the estimated persistent death of bats and birds caused by this project will not be as bad as all other know anthropomorphic causes of decline is not a persuasive argument in support of adding to the problem.	As described in EIS Section 3.3.2.1.2 (Avian Populations, Existing and Future Trends and Actions), "Although the expansion of wind energy may not be the primary driver for the decline of most avian species, fatalities from turbine collisions exacerbate other impacts that have led to these declines and are becoming an increasingly important source of avian mortality. For species that are already declining, and for species with low reproductive rates, even a relatively small increase in the fatality rates could have a significant impact on their populations in the analysis area." Also see EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), which states, "It is also important to note that wind energy results in an estimated 0.269 avian fatality per gigawatt-hour (GWh) of energy produced, whereas nuclear power causes an estimated 0.416 avian fatality per GWh, and traditional fossil fuel energy causes 5.18 avian fatalities per GWh (Sovacool 2013). Thus, alternatives with lower generation capacities could result in greater impacts to avian populations if other types of energy generation are used to satisfy the demand for electricity that would have been generated under alternatives with higher generation capacities."
3037-1	Cameron Stauffer	Evaluating the EIS for Lava Ridge Wind Project brings up concerns for local bird populations. The studies are dating back to 2016, and do not account for the increase of turbines up to the current time	As described in Section 3.3.2.2.2, "The estimated avian fatality rate used in this EIS (and detailed below) was based on available data from existing wind farms, which had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the Lava Ridge Wind Project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for the Lava Ridge Wind Project. Thus, the estimated avian fatality rates used in this EIS account for variability in the RSH."
3102-1	Patrick Cowan	The Erickson et.al. numbers are inappropriately used by proponents to bolster their claims that preconstruction avian surveys are an unnecessary expense.	In addition to the 2 years of avian use surveys, MVE conducted 2 years of raptor nest surveys, and 2 years of greater sage-grouse lek surveys (WEST 2020 through 2023). As described in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail), the Erickson et al. (2014) study supports the conclusion that most small passerine species are at low risk of experiencing population-level impacts from fatalities due to collisions with operational turbines; AWWI (2016) and Choi et al. (2020) reached similar conclusions. This section also discusses recent modeling indicating the potential for some small passerines to experience population-level impacts; however, none of the species Conkling et al. (2022) found to be vulnerable to fatalities at wind energy facilities occur in the siting corridors. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the USFWS Land-based Wind Energy Guidelines (USFWS 2012).
3230-1	Gary Carney	Each blade travels at speeds over 200 mph. This means any bird traveling through just one windmill footprint will face 3 blades traveling at death speeds every 3 seconds. It would be easier for a pedestrian to cross the track at the Daytona 500 than it would be for a bird to pass through just ONE windmill....and there are hundreds of windmills. This	Estimated avian fatality rates for each of the action alternatives, before the implementation of mitigation measures, are presented in Table 3.3-12 in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B). Additional species-specific discussion is provided in this section and in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). EIS Section

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		is going to have severe effects on our migratory birds. Our area sees great patterns in migratory birds. Geese, ducks, sandhill cranes, pelicans, eagles, and other raptors will be decimated in this disaster. The Minidoka Wildlife Refuge There has been an extreme lack of due diligence on this issue and needs to be addressed through proper wildlife ecologists.	3.3.2.1 (Avian Populations, Affected Environment) describes habitat features important to migrating avian species in the siting corridors and surrounding vicinity; additional details on avian use in the siting corridors are provided in Section 3.3.2.1.1 (Avian Populations, Avian Use in the Siting Corridors) in EIS Appendix 9. Minidoka National Wildlife Refuge is more than 18 miles east of the nearest siting corridors and would not be directly impacted by any of the action alternatives. EIS Section 3.3.2.1 and Section 3.3.2.1 in EIS Appendix 9 describe the presence of surface waters that may be important to migrating birds in the vicinity of the siting corridors and discloses the potential for ephemeral surface water features in the siting corridors (i.e., playas and vernal pools) to provide migratory stopover habitat for waterfowl and other avian species when inundated. Therefore, additional discussion of Minidoka National Wildlife Refuge would not lead to a more informed analysis. AIB-1 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) has been revised to describe how measures to minimize or avoid impacts to surface waters, including intermittent and ephemeral features, would indirectly benefit avian species.
3405-1	Susan Laatsch	Has anyone thought of maybe Painting the Blades other than White ??? so Birds might see the blades & turn away. maybe a big red & yellow checker board ??? Can Birds See Colors??	As described in EIS Section 2.9.5 (Alternative Components), “BLM evaluated painting one turbine blade black on each turbine because this has been documented to reduce bird fatalities by 70% in Europe (May et al. 2020). However, this would not comply with FAA standards (FAA 2020).” See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts to avian populations from turbine collisions.
3997-3	Angelee Eames	3. Any wind energy project that has existed has killed birds-towers of this size will kill 16.5 eagles and other large raptors per year. How will the population thrive if that many die every single year. 30 years of the deaths of these birds could lead to extinction? 10,200-17,799 of all birds per year for thirty years-how many will be killed by turbines?	See EIS Section 3.3.2 (Avian Populations) for a discussion of impacts to avian populations; estimated fatality rates for all avian species and diurnal raptors alone are provided for each alternative in Table 3.3-12. Eagles are discussed in EIS Section 3.3.3 (Eagles).
4220-3	Sue Page	Same as being told the bird migratory path was only reviewed for a few hours a day once a month? Really?! Bats and owls fly at night so they weren't even considered? No study was done on the hummingbirds we all get excited to see and feed as they move through the Magic Valley. No study!!? These little birds can fly as high as 500 feet and could get sucked into these turbines. Not acceptable Furthermore they will be allowed to kill eagles thanks to a permit created by the Obama administration in 2016. Don't kill our birds like what was done at the Alta Wind Energy Center in California. (This was the largest slaughtering of birds in the world because the time wasn't taken to review the migratory paths of flying creatures.)	In addition to the 2 years of avian use surveys, MVE conducted 2 years of raptor nest surveys, and 2 years of greater sage-grouse lek surveys (WEST 2020 through 2023). The calliope hummingbird is the only special-status hummingbird that occurs in the siting corridors and is addressed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Other hummingbird species may occur in the siting corridors but did not meet the criteria for inclusion in the EIS because they do not carry a special-status designation in Idaho, and thus, are assumed to have relatively large and stable populations. MVE is pursuing an eagle ITP in accordance with the Final Programmatic EIS for the Eagle Rule Revision (USFWS 2016a), which is being evaluated in a separate NEPA analysis being conducted by the USFWS (see Section 3.3.3 [Eagles]). In addition to the mitigation measures for eagles presented in the EIS (see EIS Section 3.3.3.2.2 [Eagles, Alternative B] and EIS Appendix 4 [Mitigation]), the USFWS would require eagle fatality monitoring and, possibly, compensatory mitigation if an eagle ITP is issued; see EIS Section 3.3.3.2.2 and 3.3.3.4 (Compensatory Mitigation). While the siting of the Altamont Pass wind facility likely contributed to the high avian fatality rates observed, the use of older, lattice-tower turbines was the primary reason for high avian fatality rates. The study by Smallwood and Karas (2009), which is also referenced in EIS Section 3.3.2.2.2 found strong evidence that replacing lattice tower turbines with monopole turbines could significantly reduce fatalities of all birds, and Krigsveld et al. (2009) reached a similar conclusion. s described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), “The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project.” A number of other measures that would be implemented to minimize or avoid impacts to birds are described in EIS Section 3.3.2.2.2 and EIS Appendix 4 (Mitigation).
4966-3	Brinya Olmstead	I also read in the draft eis that approximately 1 bald eagle and 13 golden eagles will be killed each year by these windmills. This should also include the immeasurable number of other birds that will die due to habitat loss.	See EIS Section 3.3.2 (Avian Populations) for a discussion of impacts to avian populations; estimated fatality rates for all avian species and diurnal raptors alone are provided for each alternative in Table 3.3-12.
5231-1	Jennifer Pfeil	It will destroy the complex ecosystem of birds of prey and insects negatively affecting the habitat. For more information regarding this harm, please review: Wind Energy’s Impact on Birds, Bats, and Insects | Wind Energy Impacts and Issues (wind-watch.org) <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wind-watch.org%2Fdocuments%2Fwind-energys-impact-on-birds-bats-and-insects%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cf05dc59761184e04897b08db1f150093%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638137947281474076%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=bB2aGsMrdclfPOlVzOpeLquHvsRrxAv%2Fc83HPBlP2yU%3D&reserved=0>	Impacts to bats are described in EIS Section 3.3.1 (Bat Populations and Roosting Habitat); impacts to birds of prey and other avian species are described in EIS Section 3.3.2 (Avian Populations), EIS Section 3.3.3 (Eagles), and EIS Section 3.3.4 (Greater Sage-Grouse); impacts to pollinators and other insects are described in EIS Section 3.11 (Pollinators and Insects). The article referenced in the comment (McPherrin 2023) does not present any new data or information that has not already been considered in the EIS. McPherrin, J. 2023. Wind Energy’s Impact on Birds, Bats, and Insects. National Wind Watch. Available at: https://www.wind-watch.org/documents/wind-energys-impact-on-birds-bats-and-insects/. Accessed December 29, 2023.
5700-1	Gar and Mary Lorain	3-58. How could one determine the impacts to avian species on something that hasn’t happened and has never been studied like these new huge windmills? The EIS admits to that. They debunk their own statement that avian fatalities would be the same as other projects admitting they don't know. This proposed facility is in a major migratory corridor, the Snake River. It is very easy for any of these migratory birds, often in large flocks, to stray from the river to the impact area and it happens differently from year to year. One to two years of study is not near enough to assess this impact. 3-65 and 66. My experience with 11 years of raptor surveys shows that great horned owls move their nests significantly over time. I was very surprised at that so one to two seasons of nest surveys is not near enough to determine the total impact. This observation is from a lot of experience in similar habitats to the project area both in	As described EIS Section 3.3.2. (Avian Populations), no widely accepted method exists for predicting postconstruction avian fatalities from preconstruction use data, and the avian fatality rates presented in Table 3.3-12 are not intended to be precise estimates but are provided to allow for a meaningful comparison between alternatives. The estimated fatality rates in this table also do not account for the implementation of mitigation measures, which are expected to substantially reduce fatalities. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), “available data from existing wind farms . . . had turbines with a mean blade height of 557 feet; this falls between the minimum (545 feet) and maximum (740 feet) blade heights proposed for the Lava Ridge Wind Project. The largest turbines included in the available data had blade heights that were slightly taller than the largest turbines proposed for

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		my official surveys and as an interested raptor observer for 50 years. [...] I know through personal observations in the desert south of Boise that ferruginous hawks do winter in Southern Idaho yet they are bareley mentioned. [...] Monitoring for only two years is drastically inadequate. This statement applies to all concerned species plus others not even mentioned which may not have been observed in a two-year window, but may come along at some point. Examples that come to mind are snowy owls and great gray owls which can pop up in unusual places in Idaho. [...] 3-65 to 68. I don't think rough legged hawks were even mentioned in the EIS and I think this is a big oversight as Idaho provides very important habitat for these species in the winter time. [...] Another species that was ignored in the EIS are swainsons hawks. I am sure they must occur in the project area as they have really increased in the Treasure Valley over the past five years. They seem to thrive in this agricultural and desert environment similar to the project area. [...] What about long and long eared owls, screech owls and barn Owls. Not much is mentioned of any of these species and I am sure all of them occur in the project area.	the Lava Ridge Wind Project." While it is likely that newer, larger turbines are underrepresented in the available data on bat fatality rates at existing U.S. wind energy facilities, there is currently no established relationship between bat fatalities and turbine height. Due to the variability in fatality rates between sites and species, the EIS individually assessed special-status avian species for their risk of experiencing population-level impacts from wind energy development. Four species (ferruginous hawk, long-billed curlew, short-eared owl, and western burrowing owl) were determined to have a moderate to high risk of population-level impacts from wind energy development and are analyzed in detail in EIS Section 3.3.2. Species that were determined to be at low risk of population-level effects are analyzed in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Although ferruginous hawk use was not observed in the siting corridors during winter in the first year of avian use studies (WEST 2021a), two ferruginous hawks were recorded in winter of the second year of avian use studies (WEST 2023). EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) has been updated with the information form the second year of avian use studies. This section also discloses the presence of a small over-wintering population of ferruginous hawks in southern Idaho based on the information in IDFGs SWAP (IDFG 2017). In addition to the avian use surveys, MVE conducted 2 years of raptor nest surveys (WEST 2020, 2021b), the results of which are summarized in Table 3.3-10. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." A number of other measures that would be implemented to minimize or avoid impacts to birds are described in EIS Section 3.3.2.2.2 and EIS Appendix 4 (Mitigation). Swainson's hawk is briefly discussed in EIS Section 3.3.2.1.1 (Avian Populations, Species Analyzed in Detail) but did not meet the criteria for detailed analysis in EIS Section 3.3.2.2 (Avian Populations, Impacts) or abbreviated analysis in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief) because it does not carry a special-status designation in Idaho, and thus, is considered to have a relatively large and stable population that is unlikely to be impacted by fatalities from collisions with operational turbines. The prairie falcon, barn owl, western-screech owl, and rough-legged hawk are also excluded from the EIS due their lack of a special-status designation in Idaho. The long-eared owl, great gray owl, and snowy owl were not included in Table App3-3 because of the lack of confirmed records within the siting corridors and immediate vicinity but have been added to Table App3-3 in the final EIS.
6081-1	Ceil Slauson	A recent study from the Norwegian Institute for Nature Research might offer a solution to fears of bird strikes. Researchers compared bird mortality rates over five years at a Norwegian wind farm and then randomly selected four out of the 68 turbines for a new paint job. They found that painting a single wind turbine blade black could reduce bird fatalities by 72%, and it was most effective at reducing collision deaths for birds of prey, such as white-tailed eagles (Haliaeetus albicilla).	As described in EIS Section 2.9.5 (Alternative Components), "BLM evaluated painting one turbine blade black on each turbine because this has been documented to reduce bird fatalities by 70% in Europe (May et al. 2020). However, this would not comply with FAA standards (FAA 2020)." See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts to avian populations from turbine collisions.
6373-1	Sharon Pratt	Paint at least one arm black or a dark blue or brown to save the birds.	As described in EIS Section 2.9.5 (Alternative Components), "BLM evaluated painting one turbine blade black on each turbine because this has been documented to reduce bird fatalities by 70% in Europe (May et al. 2020). However, this would not comply with FAA standards (FAA 2020)." See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts to avian populations from turbine collisions.
6820-2	Chris Callen	The Windmills kill 1000's of birds especially Eagles and Hawks, why is it OK for these wind turbine projects to kill protected birds but if anyone else does it there are fines and possible jail time. I do not believe we should let these killers of our, Idahos Hawks and Eagles to be allowed to destroy and kill.	Compliance with the MBTA is discussed in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B). As described in EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), "The USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines."
6885-1	Louis Zamora; Twin Falls Canal Company	I have wildlife concerns with the EIS. With number of proposed projects in Southern Idaho (Lava Ridge, Salmon Falls, Taurus. and others) I believe the EIS should have encompassed the whole Southern Idaho Region. An eagle, hawk, goose, duck and other migrating birds could be at Salmon Dam one day off to Hagerman the next and maybe over to Idaho Falls the following. The Hagerman Valley has massive number of migratory birds flying in and out of it every day. The amount of bird kills with all the projects combined would be staggering and, in my opinion, would jeopardize wildlife populations.	The analysis area for avian populations and eagles both include southern Idaho; for additional details, see EIS Section 3.3.2 (Avian Populations) and EIS Section 3.3.3 (Eagles), respectively. Cumulative effects to avian populations and eagles, including other proposed wind energy projects are discussed in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts) and EIS Section 3.3.3.2.7 (Eagles, Cumulative Impacts), respectively.
7403-1	Jewel Vieu	This is to express my opposition to the Lava Ridge Project AND any future wind farms in Idaho. There are many negative impacts to address regarding this proposed wind farm, but I have been advised to stick to one issue. The fact that there needs to be an "acceptable" number of kills of Bald Eagles, (.56/year), to Golden Eagles, (13.3/year), to bats, (15,000/year), leads me to have a very negative opinion of the 740-foot-tall windmills. Why is a total avian kill of 17,791 considered acceptable? What is the "compensatory mitigation" that may be required if adaptive management measures are unsuccessful at reducing avian fatalities? If the birds are dead, they are dead. The fact is that Eagles and many bats are protected by law, how can any number be allowable much less acceptable? Post construction	As stated in EIS Section 3.3.1 (Bat Populations and Roosting Habitat) and EIS Section 3.3.2 (Avian Populations), the estimated avian and bat fatality rates presented in Table 3.3-4 and Table 3.3-12 are not intended to be precise predictions but are presented to allow for a meaningful comparison between the alternatives. These fatality estimates also do not account for the implementation of mitigation measures that would be implemented to minimize or avoid impacts to bats and birds; see EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts), EIS Section 3.3.2.2 (Avian Populations, Impacts), and EIS Appendix 4 (Mitigation). A bat fatality rate of 15,496 bat fatalities per year and avian fatality rate of 17,799 birds per year represents a worst-case scenario for the maximum generation

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		monitoring would assess the actual avian fatality rate. A bit late, when the birds are dead, they are dead. Please do not approve the Lava Ridge Wind Project, or any other wind farm project in the Great State of Idaho.	capacity under Alternative B, which is the highest generation capacity under any action alternative. These fatality rates would only be expected if the facility had been very poorly sited and none of the mitigation measures listed in EIS Appendix 4 were implemented. These maximums are presented in the EIS to provide the context needed for a meaningful comparison between alternatives and the development of mitigation strategies. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]). . . . Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." As described in EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat), the siting corridors lack substantial roosting habitat for bats and are located in area of low summer bat occupancy. Though bat activity in the siting corridors is highest during the fall migratory period, the siting corridors lack forested and riparian habitats preferred by migrating bats and there is no indication that the siting corridors are located within a major bat migratory corridor. Thus, it is expected that fatality rates would be closer to the mean avian and bat fatality rates presented in Table 3.3-4 and Table 3.3-12 if adaptive management measures such as curtailment and acoustic deterrents were not implemented. Due in part to the uncertainty in quantifying fatality rates prior to construction, proposed mitigation measures include postconstruction avian and bat fatality monitoring to assess fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012) which were developed to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). MVE is pursuing an eagle ITP in accordance with the Final Programmatic EIS for the Eagle Rule Revision (USFWS 2016a), which is being evaluated in a separate NEPA analysis being conducted by the USFWS (see Section 3.3.3 [Eagles]). There is currently no formal system in place to permit incidental take of bat species resulting from the operation of a wind energy facility because there are currently no laws or regulations in place that prohibit incidental take of bats. Compensatory mitigation for bats and avian species is described in EIS Section 3.3.1.4 (Bat Populations and Roosting Habitat, Compensatory Mitigation), EIS Section 3.3.2.4 (Avian Populations, Compensatory Mitigation), EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), and EIS Section 3.3.4.4 (Greater Sage-Grouse, Compensatory Mitigation).
7546-2	Judith Ruprecht	My concern is for its impact on migratory songbirds. Migrating songbirds are vulnerable to collisions with the wind tower propellers. They often fly during the night and often at low elevations. We know that they collide with skyscrapers, under which dozens of bodies of birds are picked up from surrounding streets and sidewalks after nights of intense, concentrated migratory movement. Accurate modeling and predictions of mortality for songbirds are impossible, because there is no other wind project the size of Lava Ridge with which to compare, and if there were, it is nowhere near to Lava Ridge. There is no other similar artifact on Lava Ridge. It is quite possible that there would be no significant mortality for several years if the project were finished, and the BAM, at some later date, the migrating songbirds could take a horrible hit. The vagaries of wind, temperature, and weather patterns cause the birds to fly at unpredictable times and routes.	See EIS Section 3.3.2 (Avian Populations) for a discussion of impacts to migrating songbirds. As described in this section, migratory movements in the western U.S. typically occur at altitudes well above the RSH of the turbines proposed for the project, and mass fatalities of migrating songbirds at existing U.S. wind energy facilities are exceedingly rare. Despite the rapid increase in wind energy development in recent years and the likelihood this trend will continue in the future, direct mortality from collision with turbines at wind energy facilities is unlikely to pose a threat to most avian populations (AWWI 2016; Choi et al. 2020). Small passerine species account for 60% of fatalities at U.S. wind energy facilities but make up more than 90% of all land bird fatalities, and even for those species killed most frequently, turbine-related fatalities constitute a small percentage of their total population size (typically < 0.02%) (AWWI 2016; Erickson et al. 2014). Small passerine species are also at less risk of population-level effects because they are shorter lived and typically reproduce at a higher rate than other taxa (Erickson et al. 2014). EIS Section 3.3.2.2.7 discusses how mortality at wind energy facilities will remain a relatively small source of mortality for most avian species, particularly small passerines, and also notes that, on a per-MW basis, the avian fatalities associated with wind energy production are much lower than other forms of energy generation such as nuclear power and traditional fossil fuels.
7742-1	Julie DeWolfe	Lava Ridge Wind Turbine Complex and Owls. BLM DEIS does not appear to resolve the conflict between wind turbine lights and owls or met tower lights and owls. While I believe it must be common knowledge, for the sake of understanding I will address the ways one would deliberately go about getting rid of owls. Google search is awash in innumerable web articles which repeat similar steps to "get rid of owls". Here is one example: https://worldbirds.com/how-to-get-rid-of-owls/ <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fworldbirds.com%2Fhow-to-get-rid-of-owls%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cca13526f4c424d4354e208db2ee266de%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638155322139712101%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=I1yMovj88LFQL3WxZcd3DBld%2FUe%2Fb5NTL%2FtrUhu7WRY%3D&reserved=0> 12 Tips On How To Get Rid Of Owls Fast (2022) Updated on August 4, 2021 / By Garth C. Clifford 1. Stop attracting songbirds 2. Create high noises and sounds 3. Use strobe lights to scare owls away 12. Use night lights It is a given that birds will be disturbed and relocate outside of turbine areas, but the noise, sound, and strobe lights will remain a problem, specifically for owls. The BLM DEIS does address FFA and met (meteorological evaluation towers) lighting, and indicates that lighting can and will be used to scare birds away, or be shut off so as not to attract, but does not address the negative impacts of strobed lighting at night, and its impact on owls. [...] On the flip side of "getting rid of owls" people who don't want rodent infestations actually want to attract owls as rodent management, which is my concern as a person living on the edge of BLM. Owls are the most earth-friendly way of managing rodent pests. Green Blog states, " A family of five barn owls, including two adults and three young will feed on about 1,000 rodents during a season"	None of the action alternatives include the use of strobe lights, nor any intentional effort to discourage owls or other birds using the siting corridors. There is no indication that the FAA-standard blinking red aviation lights proposed for use on the turbines either attract or repel and bird species. An ADLS would also be used, and these lights would only be illuminated approximately 8% of the time. Therefore, it is unlikely that project-related would substantially impact owls under any of the action alternatives.

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		https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=25626 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fucanr.edu%2Fblogs%2Fblogcore%2Fpostdetail.cfm%3Fpostnum%3D25626&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cca13526f4c424d4354e208db2ee266de%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638155322139712101%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Lin7%2BoOiD1oUAxTpfznj2ImV1s9seDE1Ku5QRFE0M6w%3D&reserved=0> Minnesota Department of Natural Resources says, “horned owl is a fearless and feared bird of prey. It is one of the few animals that will kill a skunk, and it may eat more than 4,000 mice per year.” https://www.dnr.state.mn.us/birds/greathornedowl.html <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dnr.state.mn.us%2Fbirds%2Fgreathornedowl.html&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cca13526f4c424d4354e208db2ee266de%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638155322139712101%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=w1VfGuenp6y%2BtAJHwg9NzvTSEx04bwVgLiBoZp1NuWc%3D&reserved=0> If we drive away owls by strobed, blinking, pulsating, flashing, and flickering lights at night, even inadvertently, we contribute to catastrophic infestations of rodents which will harm everyone living in proximity of the wind turbine industrial complex. By the following year our ag industry will be negatively impacted, which will hurt our farmers and ranchers and the animals who depend upon ag for their livelihood and life. I hope you agree that we cannot destroy the fragile balance of nature in Idaho for a climate change agenda that environmentalists are now fleeing. Option A, to do nothing is the only reasonable decision. We must not allow our public lands to be turned into industry and our owls driven out of it by strobed lighting.	
8721-1	Doreen Alexander	I am writing in opposition to the Lave Ridge wind project. I also wanted to mention that a ‘No Build’ option should be available and accepted as a viable option to the BLM and those decision makers involved. I am a resident of Jerome County and have lived here 2 years. I moved here from California and Las Vegas and have finally found my true home. I had many reasons to escape NV and CA and I am sure you have heard them all. Idaho freedom and landscape were among the priority features on my list. I have almost 5 acres of land and the most special on that land are the variation of avian species. I have seen over 19 species of birds on my small property alone. It brings me great joy to provide an eco-system for them and their families. They in return provide a service of insect control as well as rodent management. Among so many other topics in the EIS that I am very concerned with, the 3.3.2 section entitled Avian Populations is especially important to myself. Studies from more than just the US have cited many devastating results that Wind farms have on all Wild life, especially Avian life. Even as far back as 2009 there was extensive data. Effects Of Wind Turbines On Wildlife, Livestock And Domestic Animals | Wind Turbine Property Loss <https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwindturbinepropertyloss.org%2Fsite%2Feffects-of-wind-turbines-on-wildlife-livestock-and-domestic-animals%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C20497e96e5f749f338e608db34441319%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638161239213029209%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=T4DDBEOxgB%2FA1TaeNmr1kLReieOMhUbZ7C3cAwuuMaY%3D&reserved=0> “Scientists have concluded that wind turbine developments placed near important wildlife areas have a long term, irreversible destructive effect upon these habitats. The effect is cumulative and increases the longer the wind turbines remain in place.” In a more recent study stating that this lost of birds from wind farms is hard to know exactly, they estimate 681,000 deaths per year which was cited in 2021. This is a horrendous amount of wild Life Avian death and one I feel is grossly understated at that. How Many Birds Are Killed by Wind Turbines? | ABC (abcbirds.org) <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fabcbirds.org%2Fblog21%2Fwind-turbine-mortality%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C20497e96e5f749f338e608db34441319%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638161239213029209%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=uUqRf3NTwHlk0xclmlaRnMVGe0h%2FOCzvQULK%2B7dL%2Bdk%3D&reserved=0> “It's important to consider that wind energy capacity has grown considerably since then. The study by Loss and others reported that there were 44,577 turbines in operation in 2012, while the U.S. Wind Turbine Database <https://eerscmap.usgs.gov/uswtdb/> indicates that there are 65,548 today — an increase of 47 percent. Adjusting for this industry growth, we can project that approximately 538,000 wind turbine-caused bird deaths occur in the U.S. each year.” “However, projecting mortality based on energy produced is more frequently used because it accounts for the size of turbines in addition to their numbers. The American Wind Energy Association reports <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.awea.org%2Fwind-101%2Fbasics-of-wind-energy%2Fwind-facts-at-a-glance&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C20497e96e5f749f338e608db34441319%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638161239213029209%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=JT9wvwJsXpt%2B5jdLWZSEQuxwQTp8pTk94fTQmvPDd0I%3D&reserved=0> that there were 60,067 megawatts (MW) of wind energy capacity in the U.S. in 2012, versus 111,808 as of this writing in 2021 — an 86-percent increase. Taking this change into account, it can be projected that approximately 681,000 birds are currently killed by wind turbines in the U.S. each year.” With MANY studies available for estimates, these are only an estimate and do not give a true representation of losses that would be incurred in Idaho. Why are these acceptable terms for windmills? Birds are an essential component to the eco-system in rodent and insect management and when devastated by human factors, this balance can be upset. In section 3.58, the EIS compares projected avian death based on prior projects so they really have no idea what these numbers could possibly end up being. This is a different location and different flight	Under the No Action alternative, the project would not be developed; see EIS Section 2.2 (Alternative A [No Action]). Cumulative fatalities from existing U.S. wind energy facilities are disclosed in EIS Section 3.3.2.1.2 (Avian Populations, Existing and Future Trends and Actions) and the increased avian fatalities expected as wind energy development continues is disclosed in EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), avian fatality rates at recently constructed wind energy facilities in Idaho and the western U.S. are much lower than avian fatality rates at wind energy facilities in the U.S., upon which early cumulative avian fatality estimates were based. Even if fatality rates similar to those in the eastern U.S. were observed at new wind energy facilities in the western U.S., fatality from collisions with operational turbines will remain a relatively small source of mortality for most avian species (see EIS Section 3.3.2.2.7). As described in EIS Section 3.3.2.2.2, preconstruction use is not correlated with postconstruction fatality rates (WEST 2011); therefore, additional avian use studies are unlikely to lead to a more informed analysis. Due in part to the uncertainty in quantifying fatality rates prior to construction, these mitigation measures include postconstruction avian fatality monitoring to assess avian fatality rates and, if high fatality rates are observed, to determine which adaptive management measures need to be implemented to reduce fatalities, as well as additional monitoring to assess the effectiveness of adaptive management measures; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines* (USFWS 2012).

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		pattern and no other project can properly prepare us for an accurate estimate of avian devastation. In Section 3.79, I am in question of using a two-year sample to adequately assess any complete volume nor quantified species accumulation. Two years would hardly be an accurate assessment of either based on changes in migratory fluctuations and weather changes. In my own yard of less than 5acres I witness a change every year on both categories. I am opposed to this wind project at any level and request a no vote to the Lava Ridge wind project.	

EAGLES

Table A-3d. Eagles

Comment ID	Commenter	Public Comment	Response to Comment
1042-26	WildLands Defense	How will the project impact wildlife? Any wind energy project poses a risk of bird kills, and a project of this size is almost guaranteed to result in bird deaths. Magic Valley Energy must receive an Incidental Take Permit from U.S. Fish and Wildlife, which covers it in the almost certain event of bald and golden eagles killed by impacts with turbine blades or other infrastructure. The draft EIS for the project as proposed estimates an average of 3,240 to 5,654 bird fatalities per year, with a maximum of 10,200 to 17,799 fatalities per year. Specifically, an average 13 golden eagles are expected to die each year. Fewer bald eagles are present, and the draft EIS estimates that 16.5 bald eagles will be killed over the 30-year operating period.	Impacts to avian species are described in Section 3.3.2 (Avian Populations) and impacts to eagles are described in Section 3.3.3 (Eagles) of the draft EIS. The issuance of an ITP for eagles is governed solely by the USFWS. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
10429-1	Toni McNeill	I am urging BLM to stop the project of Lava Ridge and specifically I am addressing the killing of the American Bald Eagle. This only takes into account one bird of prey and does not address the many other birds of prey that will be affected. It should not be allowed to give these companies a pass on killing X amount of Bald Eagles because it is for "wind energy". This project is fraught with discrepancies and favoritism towards a specific ideology. It will not supply the energy we need and will destroy our beautiful landscape, Bald Eagles, and many of wild animals that live in this area.	Impacts to non-eagle raptor species are described in Section 3.3.2 (Avian Populations) of the draft EIS. Pursuant to Section 504 (43 USC 1764) of FLPMA, the BLM must consider and process applications for ROWs. It requires the BLM to evaluate the proposed ROW application based on factors such as the public interest, environmental impacts, resource conservation, and compatibility with multiple land uses. An ITP issued by the USFWS allows for the limited take of eagles, including bald eagles and golden eagles, under certain circumstances. The ITP operates within the framework of the BGEPA and the regulations established under it. These laws provide provisions for the take of eagles, including incidental take, which refers to unintentional take that occurs during otherwise lawful activities. An ITP is issued with specific conditions that must be followed by the permittee to ensure compliance with the terms of the permit. These conditions may include limitations on the number of eagles that can be taken, reporting requirements, and adherence to specified mitigation measures. The permit has a set duration, typically ranging from a few years to several decades, depending on the nature of the project and its potential impacts. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
10431-1	Richard Gailey	The possibility that so many birds of all species might die because of thye wind turbines concerns me, the eagles and the hawk population alone could cause and explosion of voles which are harmful to the farms in the area. The turbines could cause an imbalance in nature.	Impacts to avian populations are described in Section 3.3.2 and impacts to eagle populations are described in Section 3.3.3 of the draft EIS.
10442-7	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Eagles (Golden and Bald) P. 3-100 In the DEIS it is stated, " Alternative B would substantially contribute to the number of estimated fatalities and prey habitat effects in the LAP for both species, though to a much greater degree for golden eagle. When combined with other future renewable energy development, Alternative B may further reduce available prey habitat near known breeding areas, which would influence the distribution of prey across the landscape. If prey resources become scarce or are difficult to locate by nesting eagles due to habitat changes, lack of available prey would reduce eagle productivity. Alternative B has the highest maximum generation capacity and largest disturbance footprint of the action alternatives and thus is likely to contribute more to the cumulative eagle population and habitat effects than the other action alternatives. As wind energy capacity continues to increase in the LAPs, collisions with turbines are anticipated to contribute to an increasingly large proportion of eagle fatalities in the LAPs." Comment: We have significant concerns about the impact that this proposal, along with other potential projects, will have on Golden Eagles through collision risk, habitat loss, loss of prey, the potential for complete abandonment of a territory, and impact on roost sites. We believe that the assessment of such impacts through both construction and operation is incomplete. We do not want to see a terribly misguided decision to lock in bad practices for 30 years, which will result directly in an untold number of dead eagles rolling back years of conservation gains.	Additional project-specific impacts to eagle populations will be analyzed if USFWS considers an ITP for the project, which is a separate action from the BLM's decision on issuance of a ROW. When the USFWS considers impacts to eagles in an ITP, several factors are taken into account. The USFWS will conduct an assessment of the potential impacts that the proposed activity may have on eagles. This assessment includes factors such as habitat loss or alteration, disturbance, displacement, direct mortality, and indirect effects on eagle populations. The USFWS requires MVE to incorporate avoidance and minimization measures into their project design to reduce potential impacts on eagles. These measures may include modifying project locations, timing restrictions to avoid sensitive periods, implementing eagle-friendly infrastructure design, and adopting best management practices to mitigate potential risks. The USFWS may include requirements for adaptive management and monitoring in the ITP. This ensures that the project's impacts on eagles are continually assessed and monitored throughout the permit duration. If unexpected impacts occur or new information becomes available, adaptive management allows for adjustments to minimize harm and enhance conservation efforts.
11297-4	Steven Upton, Linda Upton	It is projected that 13.3 golden eagles will be killed per year. It is projected that 0.56 or half of a bald eagle every year. LS Power, aka Magic Valley Energy is allowed to kill X number of eagles per year, if they exceed that number, they merely pay a fine. Why is LS Power, aka Magic Valley Energy allowed to kill eagles but a normal citizen would go to prison?	An ITP issued by the USFWS allows for the limited take of eagles, including bald eagles and golden eagles, under certain circumstances. The ITP operates within the framework of the BGEPA and the regulations established under it. These laws provide provisions for the take of eagles, including incidental take, which refers to unintentional take that occurs during otherwise lawful activities. An ITP is issued with specific conditions that must be followed by the permittee to ensure compliance with the terms of the permit. These conditions may include limitations on the number of eagles that can be taken, reporting requirements, and adherence to specified mitigation measures. The permit has a set duration, typically ranging from a few years to several decades, depending on the nature of the project and its

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			potential impacts. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
11327-10	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	Surveys identified active Golden Eagle nests and active use throughout the Lava Ridge Wind Project's siting corridors. Additionally, Golden Eagle flight heights were recorded most frequently (52%) within the rotor-swept height (130-790 feet). Given this information, it is no surprise that the fatality estimates from turbine collisions (over the 30-year operation period) reported in the DEIS are incredibly high: 399.3 total Golden Eagles for Alternative B, 337.8 for Alternative C, 235.8 for Alternative D, and 229.8 for Alternative E. Taking into account indirect impacts, the impacts are likely much higher and extend beyond the Lava Ridge Wind Project.	Current trends for the Eagle Management Unit and Local Area Population are described in Section 3.3.3.1.1 (Existing and Future Trends and Actions) of the draft EIS, which describes the known permitted actions and indirect impacts to these eagle populations. Potential cumulative impacts to eagle populations are described in Section 3.3.3.2.7 (Cumulative Impacts) of the EIS, which considers known permitted actions and indirect impacts within these populations beyond the project. Section 3.3.3.4 (Compensatory Mitigation) of the EIS describes the potential compensatory mitigation that would be required should permitted take exceed the applicable eagle management unit take limits, if USFWS approves an ITP.
11327-11	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	iii) Fatality Monitoring Must be Robust and Transparent The DEIS states that the applicant would conduct a minimum of two years of intensive post- construction monitoring for eagles and that additional postconstruction monitoring would be conducted for all years of the permit. Clarification is needed where this latter monitoring would take place. Given how active turbines are expected to change the behavior and use areas of Golden Eagles over time, as well as potential for migrants traveling through the area. Also, fatality monitoring reports should be made available to the public and be considered, by the receiving agencies, in conjunction with those of adjacent operating wind projects. Additionally, given the increasing interest of wind development in Idaho, the BLM and USFWS should consider having feather samples from mortalities evaluated to determine natal origins. This information will better infer the consequences of Golden Eagle mortalities to range-wide population-level consequences, using a framework developed by Katzner et al. (2020)39. Conkling et al. (2022) also emphasize the importance of assessing the origins of wildlife affected when interpreting consequences to wildlife populations of these, or any, types of anthropogenic activities.	MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
11518-1	Karen Steenhof	The Snake River Plain provides key habitat for Golden Eagles. The final EIS should recognize that the area is home to not only nesting eagles but also to wintering eagles from throughout the continent. From 1978-1984, surveys indicated that the number of wintering Golden Eagles in the area was significantly higher than in the fall. Telemetry studies have tracked eagles from Washington, Canada, and Alaska using the Snake River Plain during winter. Thus, eagle mortalities caused by turbines will affect far more than the local resident population. Earlier surveys indicate that current Golden Eagle densities in the Lava Ridge area and throughout southern Idaho are lower than they were 30-40 years ago. If populations were to rebound to earlier levels, turbine-caused eagle deaths might exceed estimates reported in the DEIS.	Impacts to wintering eagles are discussed in Section 3.3.3.2 (Impacts) of the draft EIS. The USFWS will be responsible for making a decision on MVE's eagle ITP application, which will be analyzed in a separate NEPA document. USFWS will establish baseline data on eagle populations within the relevant geographic area, including information on nesting densities, breeding success, survival rates, and other key demographic factors. Existing survey data, research studies, and monitoring programs contribute to the understanding of population dynamics. The analysis incorporates a landscape-level perspective, considering the larger ecological context in which the project exists. This may involve examining regional population trends, connectivity between populations, and the availability and quality of suitable habitat across the landscape. Landscape-scale analyses help assess potential cumulative impacts and the long-term sustainability of eagle populations. An ITP often incorporates adaptive management principles, allowing for adjustments in response to new information and data. Population monitoring, postconstruction surveys, and ongoing data collection contribute to the evaluation of actual impacts and inform any necessary adaptive management actions. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
11535-38	Steven Andersen	The negative, irreversible impacts to eagles (both bald and golden) are glaring, and the DEIS does not dispute as much. Instead, the BLM, in arguing the project should still move forward despite the irreparable harm to eagles, relies on only a few unavailing and unsupported proposed arguments, curtailment measures, as well as what the BLM deems "warranted" compensatory mitigation, which it fails to identify. All of these arguments and positions fail for several reasons and fall well short of meeting the threshold burden required.	Pursuant to Section 504 (43 USC 1764) of FLPMA, the BLM must consider and process applications for ROWs. It requires the BLM to evaluate the proposed ROW application based on factors such as the public interest, environmental impacts, resource conservation, and compatibility with multiple land uses. Additional project-specific impacts to eagle populations will be analyzed if USFWS considers an ITP for the project, which is a separate action from the BLM's decision on issuance of a ROW. When the USFWS considers impacts to eagles in an ITP, several factors are taken into account. The USFWS will conduct an assessment of the potential impacts that the proposed activity may have on eagles. This assessment includes factors such as habitat loss or alteration, disturbance, displacement, direct mortality, and indirect effects on eagle populations. The USFWS requires MVE to incorporate avoidance and minimization measures into their project design to reduce potential impacts on eagles. These measures may include modifying project locations, timing restrictions to avoid sensitive periods, implementing eagle-friendly infrastructure design, and adopting best management practices to mitigate potential risks. If unavoidable impacts to eagles are expected, the USFWS may require MVE to provide compensatory mitigation. This could involve offsetting the anticipated harm through the implementation of measures that benefit eagle populations or their habitats. Compensatory mitigation could include habitat restoration, habitat enhancement elsewhere, or funding for eagle conservation programs. The USFWS may include requirements for adaptive management and monitoring in the ITP. This ensures that the project's impacts on eagles are continually assessed and monitored throughout the permit duration. If unexpected impacts occur or new information becomes available, adaptive management allows for adjustments to minimize harm and enhance conservation efforts.

Comment ID	Commenter	Public Comment	Response to Comment
11535-39	Steven Andersen	The DEIS drastically understates the potential eagle take this project will have given its unprecedented magnitude. Anthropogenic factors (including collision with wind turbines) accounts for nearly 60% of all golden eagle mortality in the coterminous western United States. 142 Golden eagle electrocution on power poles is a global conservation problem and a leading anthropogenic cause of death for golden eagles, with an estimated 504 golden eagles (95% credible interval: 124–1,494) electrocuted annually in North America.143 These numbers are directly related to wind farms. Between the proposed action and alternatives, the BLM estimates that golden eagle fatalities from "turbine collisions" may range from 13.31 golden eagles per year (399.3 total over 30-year operation period) to 7.66 golden eagles per year (229.8 total over 30-year operation period).144 The BLM estimates that for bald eagles, the fatalities may range from .56 bald eagles per year (16.8 total over 30-year operation period) to .11 bald eagles per year (3.3 total over 30-year operation period).145 The BLM attempts to justify these numbers by estimating that the project LAP for eagles contains "approximately 997 golden eagles; the 1%, 5% and 10% benchmarks for this estimate are approximately 9.97, 49.87, and 99.75 golden eagle[deaths], respectively," and "approximately 123 bald eagles[; t]he 1%, 5% and 10% benchmarks of this estimate are approximately 1.23, 6.16, and 12.32 bald eagle[deaths], respectively."146 These estimates are pure conjecture because turbines of this size have never been constructed, maintained, or monitored—not to mention, the proposed accepted rates are simply unacceptable.	The LAP and fatality estimates were developed by the USFWS, documented in detail in EIS Appendix 6. Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model of the draft EIS, and represent the best available scientific information available to disclose potential impacts to eagle populations. An ITP, if approved by USFWS, would incorporate adaptive management principles, allowing for adjustments in response to new information and data. Population monitoring, postconstruction surveys, and ongoing data collection contribute to the evaluation of actual impacts and inform any necessary adaptive management actions. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project's eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles. Additionally, collector lines would be installed underground, and any aboveground collector and transmission lines would be constructed in compliance with Avian Power Line Interaction Committee guidelines, which provide specific engineering standards to reduce risk of electrocution and collision (applicant-committed measures 29 and 30). MVE would also use tubular structures for collector lines, where practicable, to deter perching (applicant-committed measure 143). As required by the greater sage-grouse ARMPA (BLM 2015), MVE would be required to equip aboveground facilities (including buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting or raptors and ravens (BLM-required measure K). In consideration of these requirements, the potential for raptor electrocution would be no greater than that disclosed in BLM (2005:5-64–5-66).
11535-40	Steven Andersen	The DEIS recognizes that "authorized take greater than 5 percent of the LAP, or qualitative indicators that suggest that unauthorized take may exceed 10 percent of the LAP, or qualitative indicators of relatively high levels of take from one source, could trigger additional environmental analysis to determine whether issuance of the permit for a particular project is compatible with the preservation of eagles." 148 In arriving at the conclusion that the unauthorized take will not exceed the purported 10% threshold, the DEIS admits that avian surveys were only conducted for two years, and in one year, for only 1,080 hours (or 45 days).149 Eagle movement, and avian movement in general, fluctuates, and therefore, this compressed evaluation period is grossly inadequate, especially given the scope of the proposed project. A survey period of 45 days out of an entire year is not the "hard look" required by the National Environmental Policy Act. See, e.g., High Sierra Hikers Ass'n v. Blackwell, 390 F.3d 630, 639 (9th Cir.2004) (quoting Neighbors of Cuddy Mountain v. Alexander, 303 F.3d 1059, 1070 (9th Cir.2002)).	The surveys conducted for the draft EIS meet the survey requirements outlined in Section 22.80 of the Eagle Rule, as required for approval of an ITP by USFWS.
11535-42	Steven Andersen	Notwithstanding the unprecedented size of the proposed turbines, the lack of specific location of the turbines further exposes the inadequacy of the DEIS. Specifically, "the exact location of infrastructure and activities within the siting corridors is unknown at this time."152 Wind turbines present risk to birds when they are foraging, when they are on nesting grounds, or generally when they are in flight.153 The DEIS recognizes specifically that the siting corridors (the specific location is still not determined) are in proximity of nesting areas, flight paths, and importantly, "expansive areas for foraging."154 Accordingly, despite the BLM claimed curtailment efforts of "avoid[ing] construction activities within 0.5 miles of any occupied golden eagle nest[,]"155 and "turbines [are to be] sited at least 2 miles away [from nests,]"156 these efforts are nothing but speculation, and do not account for the escalated risks associated in areas of nesting, foraging, and flight patterns. Put another way, eagles are at greater risk during local movements, i.e., foraging, and the DEIS recognizes that foraging is "expansive" in the siting corridors given its undeveloped conditions.157 Even more concerning, since the specific placement of the turbines is currently undisclosed, there are concerns about the possibility that the turbines may be placed in wind corridors directly in the eagles' paths, or areas of heightened risk generally, leading to more deaths than are estimated (which is already understated). Eagles flying over summits, ridge-tops, cliffs and steep slopes, whether in active migration or moving locally, flew at altitudes that put them at risk from modern horizontal-axis industrial wind turbines. 158 However, without the specific location, the turbine development cannot be properly evaluated, which means the fatality rate cannot be (and has not been) properly considered or mitigated.	The BLM has specific requirements for issuing an NTP for construction on public lands. The BLM requires submission and approval of all necessary construction plans, including engineering designs, environmental management plans, and any required permits or authorizations. MVE must demonstrate adherence with ROW terms and stipulations, which includes siting turbines at specified distances from identified sensitive resources. Additional project-specific impacts to eagle populations will be analyzed if USFWS considers an ITP for the project, which is a separate action from the BLM's decision on issuance of a ROW. When the USFWS considers impacts to eagles in an ITP, several factors are taken into account. The USFWS will conduct an assessment of the potential impacts that the proposed activity may have on eagles. This assessment includes factors such as habitat loss or alteration, disturbance, displacement, direct mortality, and indirect effects on eagle populations. The USFWS requires MVE to incorporate avoidance and minimization measures into their project design to reduce potential impacts on eagles. These measures may include modifying project locations, timing restrictions to avoid sensitive periods, implementing eagle-friendly infrastructure design, and adopting best management practices to mitigate potential risks. The USFWS may include requirements for adaptive management and monitoring in the ITP. This ensures that the project's impacts on eagles are continually assessed and monitored throughout the permit duration. If unexpected impacts occur or new information becomes available, adaptive management allows for adjustments to minimize harm and enhance conservation efforts.
11598-18	Idaho Conservation League	Eagles We are encouraged that the effects analysis for bald and golden eagles took into consideration impacts at the population level (EMU) as well as cumulatively, between the four relevant Local Area Density Units. Proposals for wind power generation in this area are expected to significantly increase in the coming decades. Across this analysis area there are already a wide variety of anthropogenic sources associated with eagle mortality. Changes in habitat disturbance and fragmentation, human activity, and land use also alter prey distribution (DEIS 3-93), possibly contributing to additional mortality through stress, malnourishment and starvation and/or decreased fitness of juveniles. Additionally, widespread disturbance linked to industrial scale wind projects is not something that golden eagles have demonstrated an ability to adapt to (DEIS 3-94). Under-occupied, high-quality habitat, created either through displacement or location avoidance could be an unintended consequence of proliferation of large wind developments in this concentrated area of south-central Idaho. We are aware that, under Alternative B, impacts of operations of the Lava Ridge Wind Project have been modeled to contribute in excess of 1% mortality within the Local Area Population (LAP), which is the "concerning" threshold for permitted eagle take under the Bald and Golden Eagle Protection Act (DEIS 3-93). Compensatory mitigation proposals from MVE notwithstanding, cumulative impacts of other proposed industrial scale projects within the LAP could push this figure closer to the 5% or 10% benchmarks for take that would preclude permit issuance from USFWS. As noted in the DEIS, unauthorized take accounts for additional eagle fatalities in the LAP. Combined, anthropogenically-sourced mortalities would certainly be expected to increase over time in an ecologically significant area of the country at a time when golden eagle populations are known to be declining. We are not yet convinced, given the range of existing alternatives, that declines associated	The results of the second year of avian use surveys, refined and additional minimization measures, and mitigation are described and incorporated into the impact analysis in the final EIS. See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS's ITP process. The risk for eagle mortality from non-turbine related factors are discussed in Section 3.3.3.2 (Impacts) of the draft EIS. Due to the lack of an accepted fatality model, fatality estimates for non-turbine actions cannot be estimated; however, with the incorporation of minimization measures and adherence with APLIC design standards, non-turbine related fatalities are expected to be rare but not impossible. Collector lines would be installed underground, and any aboveground collector and transmission lines would be constructed in compliance with Avian Power Line Interaction Committee guidelines, which provide specific engineering standards to reduce risk of electrocution and collision (applicant-committed measures 29 and 30). MVE would also use tubular structures for collector lines, where practicable, to deter perching (applicant-committed measure 143). As required by the greater sage-grouse ARMPA (BLM 2015), MVE would be required to equip aboveground facilities (including buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting or raptors and ravens (BLM-required measure K). In consideration of these requirements, the potential for raptor electrocution would be no greater than that disclosed in BLM (2005:5-64–5-66)

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		with the Lava Ridge project can be appropriately offset with the current set of compensatory mitigation strategies that are outlined in this DEIS. While we appreciate that MVE conducted avian surveys over a two year time period, only the first year of findings were included in the DEIS. We believe that decisions about avoidance, minimization and mitigation tactics for potential eagle impacts from the project should have been deferred until all eagle study results had been summarized. Understanding if and how observations within siting corridors may have changed between study years would have been helpful in trying to assess any emergent behavior trends or to identify specific flight patterns in the risk cylinder. This seems particularly important at such low densities of bald and golden eagles in the area of analysis. The DEIS notes that eagle prey species such as cottontail rabbits and black-tailed jackrabbits will likely be displaced due to project activity and disturbance. The conclusion that prey resources will be lost, potentially compromising eagle fitness in the area, is oddly juxtaposed to the minimization tactic that is also detailed in the eagle section which describes elimination of habitat features that could actually attract and retain prey species within the project area. This includes removal of natural material, such as rock piles, woody debris and tall vegetation. It may be preferable to restore native vegetation, attract and retain prey species outside of the project area where renewable energy projects are unlikely to occur. Because lead poisoning is a significant but preventable form of eagle mortality, another potential mitigation mechanism is supporting voluntary efforts to assist interested sportsmen transition from lead ammunition to copper ammunition. We also don't believe that burial of collector lines is a practicable minimization mechanism due to the difficult volcanic geology in the area. Other minimization techniques included in the DEIS, such as curtailment and detector-based camera systems, should be implemented from the start of operations, rather than waiting to see if "other adaptive management measures are insufficient to minimize fatalities." This is especially true given the high degree of behavioral variability in reaction to the presence of turbines on the landscape (DEIS 3-98). We believe that MVE should assume that only after all minimization methods have been fully implemented, it will be possible to conclude that the wide range of project-related impacts is adequately addressed. We would also advocate that eagle mortality due to project-related causes not associated with turbines, such as electrocution, transmission/guyline strikes and vehicles/roads also be included in the impacts analysis – especially for golden eagles.	
11723-3	David Robinson	legal killing of wildlife. And, what is this crap about being able to obtain a LEGAL EAGLE KILLING PERMIT.	See EIS Section 3.3.3 (Avian and Bat Species, Eagles), and EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers) for information regarding eagle take permitting. Section 3.3 (Avian and Bat Species) provides assessment of project impacts to avian and bat species, and Section 3.3.3 focuses on Eagles. Section 3.3 (Avian and Bat Species) additionally summarizes measures to be undertaken to reduce fatalities to these species. Per Section 3.3.3 (Eagles), the analysis of effects to eagles from potential fatality focuses on impacts at the population (eagle management unit [EMU]) and cumulative [LAP]) scale (Figure 3.3-5). EMUs for golden eagle are set at the BCR level (the golden eagle LAP is within the BCR 9 EMU). EMUs for bald eagle encompass geographically distinct breeding areas (the bald eagle LAP is within the Northern Rocky Mountains EMU). The USFWS analyzes permitted eagle take and determines its consistency with their preservation standard at these scales. Permitted (by the USFWS) eagle take at the EMU scale is governed by a take limit that is compatible with maintaining an equilibrium population size equal to or greater than the population objective, which is the estimated population size in 2009. Take limits at the EMU scale are intended to prevent local extirpation of eagles—both breeding and non-breeding. Per EIS Appendix 10, Consultation and Coordination, Cooperating Agencies, U.S. Fish and Wildlife Service section, the USFWS provided input regarding 1) the risk of incidental take of eagles from turbine operations; 2) avoidance and minimization measures, compensatory mitigation, and fatality monitoring related to incidental eagle take from turbine operations; and 3) project impacts to migratory birds, bats, endangered species, and critical habitat, and options for addressing those impacts. The USFWS intends to use this information in decision-making for a BGEPA eagle take permit application submitted by MVE on July 28, 2021, and in meeting other USFWS statutory obligations. Coordination with the USFWS on the above matters is ongoing. Per EIS Appendix 10, Mitigation Framework, Types of Mitigation section, the USFWS will issue their own NEPA document to facilitate their decision regarding the project's BGEPA eagle take permit application submitted by MVE on July 28, 2021. This document may include additional mitigations should USFWS find they are warranted after completing their own NEPA analysis.
11833-4	Bob Hassoldt	This project is going to kill golden eagles. It has an annual expected mortality of 13.31 eagles. The problem is as follows: In the scientific journal, Conservation Biology, Volume 31, No. 2, a research article titled "Golden Eagle fatalities and the continental-scale consequences of local wind-energy generation" by Todd E. Katzner and others, studied the golden eagle mortality that occurs at the Altamont Pass Wind Resource Area (APWRA). They were trying to determine if the deaths caused there by windmills are compensatory, meaning they replace natural mortality, or they were additive, meaning they were above and beyond natural mortality. What they found was that the stable population of golden eagles there is only sustained by immigration from other eagle populations across the distributional range west of the Mississippi river and that the mortality caused by collisions with a 200 mph windmill blade tip is additive. DNA analysis showed that the majority of those in- migration eagles are coming from Wyoming, Idaho, Oregon and the desert southwest. The analysis also points out: "One of the solutions to maintaining the population at the APWRA is to mitigate the killing of golden eagles elsewhere across the western U.S." The proposed mitigation for this project isn't going to increase or even maintain the western golden eagle population. Given this situation the project should not be approved.	See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS's ITP process.
11871-23	WildLands Defense	Wind Boom Threat to Wyoming and West-Wide Population of Golden Eagles A recent article on the industrial wind farm and Golden eagle killing situation in Wyoming describes: "Most of the [Wyoming wind energy] development is just going off like a rocket right now, and we already have eagles that are getting killed by wind turbines — a hell of a lot more than people really understand," Lockhart, a former U.S. Fish and Wildlife Service biologist, said. Lockhart,	See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS's ITP process.

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		who now works as a consultant for private companies, surveys eagle populations in Wyoming — mostly around Medicine Bow and in the Shirley Basin. The region is the “heart and soul” of golden eagle habitat in North America, he claims. Experimental wind turbines here date back to the 1980s, and it’s the epicenter of existing and prospective development ambitions”. Also: “While some wind energy representatives say tools exist to reap energy from the wind while conserving species, Lockhart contends that level of development will require much more planning to consider cumulative impacts to eagles, raptors, songbirds and all other wildlife. Additionally, the FWS should reconsider its “incidental take” allowance for individual wind energy facilities, he said. “The Fish and Wildlife Service has provided an allowable take for those [individual] projects of 10 to 14 eagles per year,” Lockhart said. “You multiply that out by the 30-year project life — that’s a hell of a lot of eagles, and they can’t sustain that kind of impact.” https://wyofile.com/wind-energy-faces-bird-kill-and-other-habitat-challenges/ Eagles observed on Snake River Plain may have come from Denali, Alaska and other areas, and be killed by Lava Ridge. Basically after the local Eagles are killed off, Lava Ridge may continue killing juvenile and roving eagles from across the western US and Canada. https://www.nps.gov/articles/aps-v5-i1-c11.htm https://storymaps.arcgis.com/stories/c46dc6f9addd42a3a2d345df8e40f725 The above map shows: “Telemetry fixes of 571 Golden Eagles tracked in North America between 1992 and 2016. Lines indicate unobserved straight-line paths between consecutive telemetry fixes”.	
11871-24	WildLands Defense	“The Golden Eagle's high mobility and diversity of movement patterns carry individuals across multiple political, administrative, and ecological boundaries (Brodeur et al. 1996, McIntyre et al. 2008, Braham et al. 2015, Poessel et al. 2016). Variation in regulatory and land-management priorities among various administrative units may have consequences for Golden Eagles. For example, an administrative unit may be disproportionately used by eagles migrating from their breeding locations in another, possibly distant, unit. In contrast, a unit may contain the majority of movements by a resident population”. Thorough pre-decisional baseline studies must be done on both the local and migratory populations of eagles and other raptors susceptible to mortality from Lava Ridge, and analysis and estimates must be conducted on the mortality already taking place from al the private land wind farms that are in operation in this region, as well as the foreseeable impacts of Taurus wind development and Salmon Falls wind development too – and any other applications BLM may be aware of. https://adfg.alaska.gov/index.cfm?adfg=wildlifenews.view_article&articles_id=95 “Young eagles make their first southern migration in late September, leaving Denali without their parents or siblings. Most follow the Rocky Mountains south, and winter anywhere from Central Alberta down into Northern Mexico. “The highest mortality on eagles is during their first fall migration,” McIntyre said. Only about 20 to 35 percent of the golden eagles McIntyre has studied survive their first year, and only 10 to 15 percent live to reach sexual maturity at about five years of age. Most die from starvation, disease, predation, electrocution and illegal shooting. Golden eagles that survive may live 25 to 35 years in the wild”. How will the proliferation of wind facilities foreseeable in Idaho, and West-wide, impact the viability of populations of Golden Eagles? How will the loss of prey habitat due to industrial solar developments impact Eagle prey species? And of course, more industrial solar will mean more potentially lethal powerlines that kill volant species that collide with them or become electrocuted,	The surveys conducted for the draft EIS meet the survey requirements outlined in Section 22.80 of the Eagle Rule, as required for approval of an ITP by USFWS. See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS’s ITP process. Cumulative impacts to eagle populations, including other proposed renewable energy projects, are discussed in Section 3.3.3.2.7 (Cumulative Impacts) of the EIS.
11871-63	WildLands Defense	Isn’t there data available for radio-collared eagles – such as the National Guard in the Birds of Prey Are has used. This data shows birds from Alaska may fky to Idaho. BLM must conduct a review of existing radiotelemetry data to determine the breeding populations of Eagles and other species that may be harmed by being killed by Lava Ridge turbines in winter or other seasons.	Additional project-specific impacts to eagle populations will be analyzed if USFWS considers an ITP for the project, which is a separate action from the BLM’s decision on issuance of a ROW. The USFWS reviews available scientific literature, species status assessments, population surveys, and other relevant information to understand the biology, distribution, abundance, and conservation status of the species that may be affected by the proposed activities. See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS’s ITP process.
11871-86	WildLands Defense	There must be a thorough EIS analysis of Cumulative effects of threats or cross-influence of threats; Factors that influence population trends, especially the role of anthropogenic mortality; migratory connectivity; population-level effects of habitat loss and degradation, environmental contaminants, climate change threats, renewable and other energy sources of mortality. Now eagles and other avian and increasingly mammalian specie face mortality caused by Avian flu. See also: https://bioone.org/journals/journal-of-raptor-research/volume-51/issue-3/JRR-16-72.1/Patterns-of-Spatial-Distribution-of-Golden-Eagles-Across-North-America/10.3356/JRR-16-72.1.full Patterns of Spatial Distribution of Golden Eagles Across North America: How Do They Fit into Existing Landscape-scale Mapping Systems? Jessi L. Brown Author Affiliations + J. of Raptor Research, 51(3):197-215 (2017). https://doi.org/10.3356/JRR-16-72.1	Cumulative impacts to eagle populations are discussed in EIS Section 3.3.3.2.7 (Cumulative Impacts).
11871-94	WildLands Defense	The Full Killing and Displacement/habitat Fragmentation Footprint of Industrial Wind Must be Assessed – Both Across the Snake River plain, as well as Regionally Numerous wind facilities have had far larger mortality footprints, and/or have covered up species mortality. For example: “Fatalities Vastly Exceed Allowed” Take” https://www.nbcnews.com/news/us-news/wind-energy-company-pleads-guilty-least-150-eagles-killed-us-rcna23360 “A subsidiary of one of the largest U.S. providers of renewable energy pleaded guilty to criminal charges and was ordered to pay over $8 million in fines and restitution after at least 150 eagles were killed at its wind farms in eight states, federal prosecutors said. NextEra Energy subsidiary ESI Energy was also sentenced to five years probation after being charged with three counts of violating the Migratory Bird Treaty Act during a court appearance in Cheyenne, Wyoming. The charges arose from the deaths of nine eagles at three wind farms in Wyoming and New Mexico. In addition to those deaths, the company acknowledged the deaths of golden and bald eagles at 50 wind	The fatality estimates disclosed in the draft EIS were developed by the USFWS, documented in detail in EIS Appendix 6. Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model of the draft EIS, and represent the best available scientific information available to disclose potential impacts to eagle populations. The USFWS incorporates information on collision risk factors, population data, species-specific sensitivity, collision monitoring and reporting, mitigation measures, and scientific research into fatality models for eagles. This includes data on eagle collisions with structures or activities obtained from monitoring programs and studies. The fatality estimates are limited by the accuracy of the information available.

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		farms affiliated with ESI and NextEra since 2012, prosecutors said. Birds were killed in eight states: Wyoming, California, New Mexico, North Dakota, Colorado, Michigan, Arizona and Illinois'.	
11871-115	WildLands Defense	Wind farms can have two broad potential adverse effects on birds via antagonistic processes: displacement from the vicinity of turbines (avoidance), or death through collision with rotating turbine blades. These effects may not be mutually exclusive. Using detailed data from 99 turbines at two wind farms in central Scotland and thousands of GPS-telemetry data from dispersing golden eagles, we tested three hypotheses. Before-and-after-operation analyses supported the hypothesis of avoidance: displacement was reduced at turbine locations in more preferred habitat and with more preferred habitat nearby. After-operation analyses (i.e. from the period when turbines were operational) showed that at higher wind speeds and in highly preferred habitat eagles were less wary of turbines with motionless blades: rejecting our second hypothesis. Our third hypothesis was supported, since at higher wind speeds eagles flew closer to operational turbines; especially–once more–turbines in more preferred habitat. After operation, eagles effectively abandoned inner turbine locations, and flight line records close to rotor blades were rare. While our study indicated that whole-wind farm functional habitat loss through avoidance was the substantial adverse impact, we make recommendations on future wind farm design to minimise collision risk further. These largely entail developers avoiding outer turbine locations which are in and surrounded by swathes of preferred habitat. Our study illustrates the insights which detailed case studies of large raptors at wind farms can bring and emphasises that the balance between avoidance and collision can have several influences. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8341499/	The provided study was reviewed and incorporated into Section 3.3.3.2 (Eagles, Impacts) of the final EIS.
11978-118	Magic Valley Energy, LLC	20. Section 3.03.3.1 - Affected Environment "During the Project's first year of avian surveys, 257 golden eagle minutes were recorded in 1,080 hours of survey." MVE requests a notation be added explaining that during the year one avian use survey, areas outside the current project were included that have since been removed in the interest of reduceing impacts to eagles and sage grouse.	This information was incorporated into the final EIS.
12054-14	Kevin Emmerich	For project construction, road traffic by trucks, water trucks, and heavy machinery can impact eagles. In wildlife considerations in planning and managing road corridors little attention has been given to the effects of disturbance by traffic on populations of breeding birds. Recent studies, however, show evidence of strongly reduced densities of many species of woodland and open habitat in broad zones adjacent to busy roads. The density reduction is related to a reduced habitat quality, and traffic noise is probably the most critical factor. Because density can underestimate the habitat quality, the effects on breeding populations are probably larger than have been established (Reijnen et al. 1997).	No proposed construction access roads would be located near known eagle nests. Mitigation measures 114 and 140 in EIS Appendix 4 Mitigation of the draft EIS provide additional restrictions on construction and maintenance activities in proximity to known eagle nests.
12054-15	Kevin Emmerich	Long-term disturbance could lead to declines in animal populations, including eagles. The proposed action would kill up to 14 golden eagles per year. At the project 30 year lifespan, that is 420 adult, breeding golden eagles. What kind of impact does removing that many raptors with a lower reproductive output from this region? Since golden eagles are naturally slow to mature and reproduce, their populations are sensitive to changes in adult and subadult survival rates. "Contextualizing the mortality of these eagles has important implications for understanding of the continental-scale population dynamics of many species of wildlife killed at wind-energy facilities in the United States (e.g., Hayes 2013; Loss et al. 2013; Pagel et al. 2013) and glob- ally (e.g., Desholm & Kahlert 2005; Drewitt & Langston 2006; Dahl et al. 2005). This is especially the case for long- lived species. Like eagles, bats are k selected (i.e., the stability of their populations depends on low adult mortality), and they may be killed in large numbers at wind- energy facilities. (Katzner et al. 2019)	Section 3.3.3.2 (Impacts) of the EIS discusses impacts from the project on eagle populations at regional and local population scales.
12469-10	Mike Telford	Hawes and Eagles are two important species that there is some good data for. I will review the information the DEIS has about them as probably the best case as most other rely on models to generate data for the models which compounds the possible problems. For this example we will use Alt E which should be the least impacts. First, the DEIS models show, on top of the existing fatalities, there would be up to 9,894 kills annually. I noted in the first of my comments that all these populations have been declining for the past 50 years of my personally observations. It defies reason that that is acceptable. Appendix 6 Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model Pages are not numbered so we numbered them for reference starting with the title page being 117. On page 121 the area of the LAP is 109-mile radius for golden eagles, and 86 miles for bald eagles. From the map it is apparent that the LAP includes the Birds of Prey national sanctuary. It is unreasonable to consider allowing kills that would impact this world-renowned site. It is the home of the International Peregrine Fund's World Center for Birds of Prey. The model attempts to use data from sparce counts and radio collared birds from a much larger area over a large span of year (2012 to 2021) to estimate kill rates. There is nothing about how the earlier years data and the later years shows any concerning trends. I would note that in the early years there were few turbines in Idaho. Now there are over 130 as noted in the DEIS. The very idea that there are authorized kills (called takes) would shock most citizens. An average citizen would go to jail for killing an Eagle. Just assume that the 6MV's that have no data kill, kills eagles at an exponential rate. You only have to tweak a model a little to swing the % of the LAP killed over the aleady unacceptable limits. The allowed reduction of 10 % of the LAP annually is seriously flawed and flies in the face of Birds of Prey recovery efforts and that Bald Eagles in Southern Idaho are rare. There is obviously a problem with electrocution (page 124) that needs to be addressed. It is not apparent if all the transmission lines are considered in the models or can be. I believe that the state of Idaho will have much to say about permits to kill Eagles in Idaho. On page 124, there is a modelers disclaimer of sorts. Table 2 footnote 1 "This is the minimum number of unpermitted eagle fatalities discovered and/or reported. Likely more fatalities were not discovered and /or reported." The model suggests under Atl E that 7.66 Golden eagles and only .11 Bald Eagles would be killed per year. Given the nature of Models in general and these very loose data and no data for 6MV, what if they are off by 3 or 4 times. The data is for the wind turbines themselves. Unlike the examples given, there is no going back to correct the model to real data as	The fatality estimates disclosed in the draft EIS were developed by the USFWS, documented in detail in EIS Appendix 6. Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model of the draft EIS, and represent the best available scientific information available to disclose potential impacts to eagle populations. The USFWS incorporates information on collision risk factors, population data, species-specific sensitivity, collision monitoring and reporting, mitigation measures, and scientific research into fatality models for eagles. The risk for eagle mortality from non-turbine related factors are discussed in Section 3.3.3.2 (Impacts) of the draft EIS. Due to the lack of an accepted fatality model, fatality estimates for non-turbine actions cannot be estimated; however, with the incorporation of minimization measures and adherence with APLIC design standards, non-turbine related fatalities are expected to be rare but not impossible. Collector lines would be installed underground, and any aboveground collector and transmission lines would be constructed in compliance with Avian Power Line Interaction Committee guidelines, which provide specific engineering standards to reduce risk of electrocution and collision (applicant-committed measures 29 and 30). MVE would also use tubular structures for collector lines, where practicable, to deter perching (applicant-committed measure 143). As required by the greater sage-grouse ARMPA (BLM 2015), MVE would be required to equip aboveground facilities (including buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting or raptors and ravens (BLM-required measure K). In consideration of these requirements, the potential for raptor electrocution would be no greater than that disclosed in BLM (2005:5-64–5-66). Potential cumulative impacts to eagle populations are described in Section 3.3.3.2.7 (Cumulative Impacts) of the EIS, which considers known permitted actions and indirect impacts within these populations beyond the project.

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		the birds are dead. Only a model can kill .11 of a bald eagle annually. The models and the DEIS does not address the other kills that will occur from all the other disturbances to feed source and traffic etc. The accumulated impacts to Eagles would very likely eliminate them from this part of the LAP and permanently change forever the greater LAP. The DEIS also notes there is no analyze of the cumulative impacts of the other proposed wind project proposed in the area of the overlapping LAP. If each is permitted to kill some eagles, soon there are truly “irreversible” impacts Those cumulative impacts must be studied and modeled together.	
12698-2	David N Cook	Just how many endangered birds, like eagles and condors, will be slaughtered during its operation?	Impacts to avian species are described in Section 3.3.2 (Avian Populations) and impacts to eagles are described in Section 3.3.3 (Eagles) of the draft EIS. Condors do not occur in Idaho and would not be affected.
12855-1	Marilyn Broek	The Bald and Golden Eagle Protection Act, enacted in 1940, has since been amended numerous times. As late as November 2022, the proposed revisions include rules related to incidental takes for permitting wind energy. These new rules are intended to make it easier to apply for and receive take permits. However, the underlying standard of all permitting requirements is the goal of “maintaining stable or increasing breeding populations in all eagle management units and the persistence of local populations throughout the geographic range of each species (50 CFR 22.6).” The draft Lava Ridge wind turbine project EIS states that up to 13.31 Golden Eagle fatalities caused by turbine collisions are expected every year. In addition, 0.56 bald eagles fatalities are expected every year. This is unacceptable to the human local population here in Idaho and certainly unacceptable to our local Golden Eagles. No measure of mitigation will prevent our glorious eagles from being chopped by the huge blades on the proposed 400 wind turbines. We say the fatalities are not caused by eagles colliding with turbines, we say the turbines are colliding with our eagles. The bird experts who did the field study for the draft EIS had many eagle sightings during their time on the project location. These experts stated clearly in their report that the current “take” limit for Golden Eagles remains at zero unless offset with compensatory mitigation. Money cannot buy our Golden Eagles in the 304 square miles the project wants here in Idaho. Nor a 1.2 to 1 replacement to some theoretical bank for eagle replacements. Do not allow a private enterprise to use public lands to destroy our much loved eagles here in the Magic Valley of Idaho.	See response to comment 11297-4 (see in Table A-3d, Eagles) for a discussion of the legal process associated with USFWS’s issuance of an ITP for eagles.
12988-10	Melody Asher	3.3.3 Eagles Your DEIS says: "This section analyzes two eagle issues in detail. The following additional eagle issue is analyzed in brief in Appendix 3: • AIB-3: How would the increase in project-related traffic affect the risk of direct avian mortality? Issues Analyzed in Detail Issue 1: How would the project affect nesting and wintering eagles? Issue 2: How would the project affect populations of eagles?" When I was out in the Lava Ridge area I personally saw 2 golden-eagles (GOEA) (out in the Gooding/Milner Recharge Area) and 1 bald eagle (near Wilson Lake where I expect that the nest that is mentioned in the DEIS is). I don't want to go out and not see these birds in our desert anymore and there are few enough that the kind of kill numbers the DEIS mentions would probably wipe them out. Perhaps you models are not correct??? I think there needs to be more studies about eagles (& hawks). I am very concerned about this proposed project (plus many more proposed projects in our valley) will have significant cumulative effects for our eagles (especially GOEA but both species) because of habitat loss, risk of collision, loss of prey and perhaps total loss of any eagles in the area.	Impacts to eagle populations are described in Section 3.3.3 (Eagles) of the draft EIS. The surveys conducted for the draft EIS meet the survey requirements outlined in Section 22.80 of the Eagle Rule, as required for approval of an ITP by USFWS. See response to comment 10442-7 (see in Table A-3d, Eagles) for a detailed discussion of USFWS’s ITP process. Cumulative impacts to eagle populations, including other proposed renewable energy projects, are discussed in Section 3.3.3.2.7 (Cumulative Impacts) of the EIS.
1618-2	Brian Olmstead	I feel the DEIS is extremely deficient in the predicted impacts to bird populations. The killing of 13 magnificent Golden Eagles and 1 Bald Eagle per year is an absolute criminal act and cannot be permitted! How many more will starve, or simply relocate to other critical Raptor habitats that are also struggling?	The fatality estimates disclosed in the draft EIS were developed by the USFWS, documented in detail in EIS Appendix 6. Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model of the draft EIS, and represent the best available scientific information available to disclose potential impacts to eagle populations. Impacts to foraging resources are discussed in Section 3.3.3.2 (Impacts) of the draft EIS. See response to comment 11297-4 (see in Table A-3d, Eagles) for a discussion of the legal process associated with USFWS’s issuance of an ITP for eagles. MVE will coordinate with USFWS to implement compensatory mitigation for eagle take under the project’s Eagle ITP (50 CFR 22.26), should a permit be granted by USFWS. Compensatory mitigation requirements would be re-evaluated every 5 years by USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5).The eagle take permit process will follow the *Eagle Conservation Plan Guidance* (USFWS 2013), which provides specific in-depth guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities. The BGEPA provides a regulatory framework for protecting eagles.
2943-2	Vern Eames	In the draft of the EIS, the eagle take as exhibited in Appendix 6, by the proposed windmills is extremely misleading. The Golden and Bald Eagle combined takes for all proposed Alternatives ranges from 8-14 per year. What the EIS does not include in this consideration is the loss in progeny - in addition to the existing population.	The fatality estimates disclosed in the EIS were developed by the USFWS, documented in detail in EIS Appendix 6 (Draft Eagle Local Area Population Analysis and Preliminary Eagle Fatality Model), and represent the best available scientific information available to disclose potential impacts to eagle populations. USFWS eagle fatality models do not consider the potential loss of breeding adults, though the potential for loss of breeding adults and impacts on productivity is discussed qualitatively in Section 3.3.3.2.2 (Eagles, Impacts, Alternative B) under Issue 2 of the EIS.
2943-3	Vern Eames	If the EIS is to be understood as written, there would only be 8 -14 eagles killed per year. A) It can be assumed the majority of the eagle take would happen in the spring when wind is most prevalent and chicks are still in the nest. This could indicate that for every eagle (either male or female, due to both being instrumental in raising the chicks) killed by windmills, there would be a loss of 1.5 chicks per year/ eagle killed. If the EIS predicts 8-14 adult eagles taken per year, the actual annual loss of life would calculate out to 20 - 30 per year. (8-14 adults plus 12-21 chicks.) B) If a breeding pair is expected to live 30 years and their breeding years are 20, the total cumulative loss of eagles over the 20- year life of the project would be: 8-14 breeding adults/ year. 1.5 chicks X 8 adults X 20 years of the project= 240 + (8 X 20) = 400 total. 1.5 chicks X 14 adults X 20 years of the project= 420 + (14 X 20) = 700 total. C) In the figure of the total loss of eagles over the 20 year life of the Lava Ridge Wind Project it comes out to 400 - 700 total eagles and their progeny lost. D) The above numbers only include the projected loss by the EIS and their progeny over the 20 year life of the project. If you compound the future loss of progeny from the direct loss of annual progeny the numbers become staggering. I will agree that after a number of years the population decline will reach a state of diminishing	See response to comment 2943-2 (see in Table A-3d, Eagles).

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		returns because there will be no replacement eagles left to be killed by the windmills. The math isn't hard, but it is backed by studied eagle data at the World Center for Birds of Prey in Boise, Idaho over many years. The problem is the EIS does not want you to calculate the total numbers and see how staggering they actually are. Anyone with half a brain knows that you not only kill the 8 -14 adults per year, but there is a compounding effect when calculating genocide of a species, even if it is in a specified location.	
3340-11	Sue Page	Also according to the EIS, 13.31 golden eagles and 0.56 bald eagles will be Ginsu'd - that is, sliced and diced- per year. If you or I collected just a single feather from a bald eagle, we would face certain imprisonment in the federal pen. Not LS Power – they are able to obtain eagle kill permits from the US Fish & Wildlife Service. If they exceed the permitted eagle kills per year, they just pay a fine. --On a side note, if the surveys show that 0.56 of an eagle will be killed per year, what happened to the 0.44 portion of the eagle? Is it flying around out there somewhere? If you spot it, let me know. I could probably make a fortune selling tickets to see it at a circus side show. Anyways, do the avian and bat fatalities concern anyone? I know Mr. T, a gentleman who penned a moving piece titled "Meadowlark on a Windmill" cares. Is the death to eagles, a federally protected bird, the ONE thing that will show LS Power to the door?	See response to comment 11297-4 (see in Table A-3d, Eagles) for a discussion of the legal process associated with USFWS's issuance of an ITP for eagles. Fatality estimates are representative of the risk of collision over time. For example, in 1 year there would be no eagle fatalities and in the following year there may be one eagle fatality, which would average 0.5 eagle fatalities per year over 2 years. Fatality estimates are informed by site-specific avian use data collected during surveys and other baseline information related to collision risk and fatalities reported at other facilities.
5700-2	Gar and Mary Lorain	3-91. Two years of study is way too short as eagle populations tend to fluctuate dramatically over time. The same can be said for their nesting activities.	See response to comment 11535-40 (see in Table A-3d, Eagles).
6910-10	Public Comments Lincoln County Community Center	But what's concerning about this study -- and this is in appendix, what I'm referring to, this is in Volume 3, and it's Appendix 6, Draft Eagle Local Area Population Analysis. They talk about -- of course they don't have specific data for this area so they're extrapolating it from a lot of other places and a bunch of stuff from the Fish and Wildlife Service, which may or may not have good or accurate data for this area. But they talk about the unauthorized take that's happening out there already, or they're assuming that's going to happen in this area, because I don't think they know about this area. But they think that the nauthorized takes and their permitted takes would still be below 10%. But what that does is double the amount of birds that are lost already. They say in this -- in this, on page -- oh, the pages aren't in your numbered. But in the table, Table 2 in this particular section, it talks about 16 being shot -- 19 being shot, 16 being electrocuted. When they talk about collision with wind turbines, and it's quite low. There's nothing in here that compares cramming 400 of these wind turbines, some of them bigger than have ever been known to man before -- never been known, they don't even have them engineered yet -- what the effects would be on the mortality then when really what they should be doing is lowering the number of these unauthorized or unpermitted takes, which some of them were shot. I know our local electric company, Idaho Power, makes great efforts to keep putting things up to try to stop birds from getting electrocuted. It still happens some, but they put these roost things up high and they're trying to mitigate and trying to help them from being electrocuted. And that's the ones we see most of the time, is the ones that have been electrocuted, right at the base of poles, you know. Obviously, that's what's happened to them. So rather than doubling the number that's okay to kill out there -- if -- if any of us intentionally killed one of these, we'd go to jail. And they're talking about giving them a permit to kill 234 of them. And I can tell you there's not that many out there to start with. I've been here a long, long time and we see them, we know they're there, and it's always a wonderful thing when we get to see a bald eagle because they're seasonal. They're not there all the time in the summertime.	The USFWS estimates the permitted number of eagles that can be taken by considering population data, using mathematical modeling techniques, and establishing thresholds and guidelines based on conservation objectives. The estimation also takes into account the effectiveness of proposed conservation measures and aims to ensure that permitted take remains below population thresholds (identified in the *Final Programmatic Environmental Impact Statement for the Eagle Rule Revision* [USFWS 2016]) to maintain the long-term viability of eagle populations. Additionally, the USFWS considers the potential impacts of unauthorized take and incorporates an adaptive management approach to ensure population sustainability. Collector lines would be installed underground, and any aboveground collector and transmission lines would be constructed in compliance with Avian Power Line Interaction Committee guidelines, which provide specific engineering standards to reduce risk of electrocution and collision (applicant-committed measures 29 and 30). MVE would also use tubular structures for collector lines, where practicable, to deter perching (applicant-committed measure 143). As required by the greater sage-grouse ARMPA (BLM 2015), MVE would be required to equip aboveground facilities (including buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting or raptors and ravens (BLM-required measure K). In consideration of these requirements, the potential for raptor electrocution would be no greater than that disclosed in BLM (2005:5-64–5-66). See response to comment 11297-4 (see in Table A-3d, Eagles) for a discussion of the legal process associated with USFWS's issuance of an ITP for eagles.

GREATER SAGE-GROUSE

Table A-3e. Greater Sage-Grouse

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1042-15	WildLands Defense	The biggest threat to sage grouse specified in the draft EIS is not from blade strikes, but from 807 acres of habitat loss. [There will be a MUCH GREATER LOSS OF HABITAT than 807 acres, for many sensitive and important species the loss will be the entire project area and a zone of at several miles surrounding it should be written off and mitigated for. The full disturbance footprint – noise, lights, etc. must be carefully assessed, admitted to, and mitigated for. Full and detailed analysis of the trajectory and trends of the local and regional population, and the degree and time-table of population declines, loss of leks, locations of leks, counts on all leks and lek routes for all periods of time, etc., must be provided. Haven't population triggers been tripped?].	As described in AIB-1 of EIS Appendix 3 (Issues Analyzed in Brief), applicant-committed measures to minimize lighting (measures 20–24 in EIS Appendix 4) would reduce effects of lighting on avian species, including sage-grouse. Both direct and indirect causes of mortality were considered, including avoidance of habitat due to proximity to infrastructure (indirect) as well as collisions with infrastructure (direct), and functional acres of habitat loss were calculated accordingly (IDFG 2022a). Only portions of the project area and siting corridors, rather than the entire project area, are on sage-grouse habitat. The amount of seasonal sage-grouse habitat in these areas is shown in Figure 3.3-7 (Greater sage-grouse seasonal use areas) and Table 3.3-10 (Mapped Greater Sage-Grouse Seasonal Use Areas in the Analysis Area and Siting Corridors). The analysis area considers the BLM designated Timmerman Hills and Craters of the Moon Habitat Assessment Framework (HAF) fine-scale habitat management areas because these cover the home range of the affected population. In the siting corridors, sagebrush habitat generally occurs in the north and east where it is interspersed with herbaceous communities (WEST 2020, 2021). The land surrounding the eastern, southern, and western portions of the siting corridors is mostly cultivated cropland. The effect of noise was analyzed in detail in Section 3.3.4.2 (Impacts) Issue 2: "How would project noise and human activity affect sage-grouse?" MVE would be required to avoid repeated or sustained noise that is 10 dBA greater than baseline levels at the lek from 6:00 p.m. to 9:00 a.m. within 2 miles (3.2 km) of leks during the lekking season (BLM-required mitigation measure A).

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			The sage-grouse population trends both locally and regionally are described in EIS Section 3.3.4.1.2 (Sage-Grouse Population and Distribution). This section discloses the status of leks within 6.8 miles of the siting corridors, population trends, and adaptive management population triggers. This EIS analysis recognizes these triggers and evaluates impacts as the BLM has prescribed in their resource management plan for sage-grouse (BLM 2015a). As described in the "Sage-Grouse Population and Distribution" section, populations across Idaho have been consistently below the 2011 baseline in Idaho, and these declines tripped adaptive management population triggers in Important HMAs (since 2018) and Priority HMAs (since 2019) in the Desert mid-scale area that are currently operational (i.e., the populations have not increased to the 2011 baseline or above, and the triggers cannot yet be removed; State of Idaho 2022). The sage-grouse management requirements, including buffer distances required for different disturbances, are shown in EIS Table 3.3-23 (Greater Sage-Grouse Buffer Requirements). The summary of impacts by alternative, calculated in acres of disturbance to sage-grouse habitat, are shown in Table 3.3-25 (Summary of Impacts to Greater Sage-Grouse). Both direct and indirect impacts, including loss of habitat, were considered for each alternative. The project would affect Greater HMAs and not Priority HMAs or Important HMAs. The number of acres that would be mitigated are based on calculations from IDFG's Habitat Quantification Tool; the process is described in detail in IDFG's Idaho Habitat Quantification Tool Analysis of Potential Effects of the Lava Ridge Wind Energy Project on Greater Sage-Grouse (IDFG 2022a). According to the greater sage-grouse ARMPA (BLM 2015a:Idaho): "Designate and manage GHMA as open for wind and solar testing and development . . . subject to required design features and buffers."
10442-8	Jan Simpkin, Melody Asher, Randy Smith, Sarah Harris, Patricia Weber; Prairie Falcon Audubon	Greater Sage-Grouse P. 3-126 In the DEIS it is stated, " The trend for increased renewable energy development in the analysis area (see Section 3.3.4.1.4, Existing and Future Trends and Actions) and the potential additive or synergistic effects of other renewable energy projects (of similar size and scale) in combination with the Lava Ridge Wind Project would compound habitat loss and fragmentation on greater sage-grouse populations and their habitats. As more sage-grouse habitat is disturbed and converted, sage-grouse activity and lek attendance may decrease. Additional construction and operation of projects would lead to more anthropogenic noise sources and perching opportunities for sage-grouse predators. The potential effects of the expansion of wind energy on sage-grouse populations would depend on a number of site-specific variables at each project location, the number and size of infrastructure, and the implementation and effectiveness of mitigation measures to reduce impacts". Comment: The Greater Sage-Grouse is a conservation-reliant umbrella species! The Greater Sage-Grouse has a complex life history that includes seasonal migrations to meet its needs. Local disruption of any part of the annual cycle could result in long-term impacts over a wider portion of the species' range. There is a vast amount of peer-reviewed literature linking habitat loss to reductions in population abundance, species richness, genetic diversity, population growth, breeding success, predation, and foraging success. The smallest North American sparrow, the Brewer's Sparrow is considered an especially sensitive species. Reports show that the bird has been steadily declining over the last few decades despite once being among the most abundant birds in the large area known as the Intermountain West. Much like the sage-grouse, fragmentation and loss of sagebrush habitat is a key threat to this bird. Research shows that these sparrows are more abundant near large sage-grouse leks, suggesting that conservation of breeding habitat for sage-grouse could also benefit this sparrow.	The literature linking habitat loss to sage-grouse population declines across its range is described in EIS Sections 3.3.4.1.1 (Sage-grouse Habitat) and 3.3.4.2.2 (Alternative B [Proposed Action]), Issue 3. This EIS section summarizes literature related to the effects of habitat loss and development in sage-grouse habitat on population abundance, predation, breeding success, and seasonal use areas. Genetic diversity relates to connectivity within and among populations. If populations become isolated connectivity is reduced. Impacts to connectivity were identified for the action alternatives (as described in EIS Sections 3.3.4.2.2 through 3.3.4.2.6). Impacts to seasonal life stages for sage-grouse are analyzed for each alternative and summarized in Table 3.3-25 (Summary of Impacts to Greater Sage-Grouse). This EIS is focused on impacts to the sage-grouse population occupying the Timmerman Hills and Craters of the Moon BLM HAF units; impacts to the species' range outside of these areas is out of scope for this EIS. A summary of the historical and current national status of the species and the factors affecting its decline are reviewed in EIS Section 3.3.4.1.1 (Sage-Grouse Habitat) and Section 3.3.4.1.2 (Sage-Grouse Population and Distribution). If the BLM selects an action alternative and a ROW is granted, any action alternative would require compensatory mitigation that would result in a net conservation gain, as required by BLM (2015a).
10512-2	S. (No Last Name Provided)	I also have major concerns with the year round resident populations of sensitive species. Where did the support for sage grouse go? There are several populations present right now in the impact areas of Lava Ridge and introducing the wind turbines is a double negative for these magnificent birds. The loss of habitat, increased human traffic, and let a lone the birds strikes that will occur from the turbines will lead us down a path that will not allow a return of these periled avians.	The BLM's resource management plans outline sage-grouse management requirements (BLM 2015a), including avoidance and minimization measures. All of these requirements, including the buffer requirements summarized in Table 3.3-23 (Greater Sage-Grouse Buffer Requirements), would apply to the project. In addition, any action alternative would require compensatory mitigation that would result in a net conservation gain, as required in BLM (2015a).
11188-3	Clare Josaitis	The DEIS states that "In addition, because the siting corridors are in a General habitat management area (HMA) for greater sage-grouse (Centrocercus urophasianus), the area is designated as open to wind energy development per BLM (2015)." Stating that the area is "designated" as open to wind energy development is misleading at best. The project area is not specifically identified or ascribed as such.	The draft EIS shows the project is in a General HMA for sage-grouse. Table 2-1 of Attachment 1 of BLM (2015a) specifically stipulates General HMAs in Idaho are open to wind development.
11195-6	Sandra Callen	Several years ago the BLM spent years in the Rogerson area studying the Sage Grouse! Please do not disturb them!	See response to comment 10512-2 (see in Table A-3e, Greater Sage-Grouse).
11204-9	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	III. Land Use Plan violation: The 2021 Comments requested that the Permittees be provided with the most recent sage-grouse habitat maps (at pg. 9) and lek maps (at pg. 11) and noted that "MD RE 1 in the 2015 Idaho ROD-ARMPA requires conformance to the buffers and RDFs even in General Habitat Management Areas, like those that would appear to be within the Star Lake Allotment." See 2021 Comments, pg. 10. Summary: The DEIS inadequately considered and assessed the GHMA within the Star Lake Allotment, inclusive of leks. The DEIS is not grounded upon any on-the-ground monitoring of sage grouse within the Star Lake Allotment. Sage grouse exist in the Allotment. The 2021 Comments stated that, assuming the Star Lake Allotment is within a GHMA, the Permittees note several management directions associated with Wind Energy development within the 2015 Idaho ROD ARMPA which must be followed by any intended Project, as follows: • Section 2.1.1 -- Special-status species: Goal SSS 1, 2, 3, 4, 5; Objective SSS 1, 2, 3, 4, 5; MD SSS 27 (Anthropogenic Disturbance); and • Section 2.2.7 –Renewable Energy (Wind and Solar): MD RE 1 (wherein it is stated that "GHMA (Idaho): Designate and manage GHMA as open for wind and solar testing and development and nuclear and hydropower development subject to RDFs and buffers.") The Comments added that "[a]ny NEPA process should assess all applicable management direction relative to the intended Project as to the Star Lake Allotment, as well as ensure any authorization documents are in conformity with such management direction as per 43 C.F.R. § 1610.5-3(a)."	The BLM has added avoidance and minimization measures in Section 3.3.4.2 (Impacts) from Alternative B with Additional Measures: Prior to construction, MVE's compliance manager would consult with IDFG for technical assistance and would conduct lek surveys in previously un-surveyed areas identified by MVE as marginal habitat within 3.1 miles of the siting corridors. RDFs (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a).

Comment ID	Commenter	Public Comment	Response to Comment
		2021 Comments, pg. 10; see also 2021 Comments, pgs. 9-13. After submission of the 2021 Comments, Permittees were provided a copy of the recent sage-grouse habitat maps and lek map by the Idaho Office of Species Conservation (“OSC”). See Attachment #5. The map confirmed that the area within the Star Lake Allotment is currently classified as a “General Habitat Management Area” for greater sage-grouse and stated that there are no known “occupied” leks within the Allotment (although the 3.1 mile buffer around an occupied lek to the N of the Allotment boundary and another occupied lek to the E of the Allotment boundary slightly overlap into the Allotment). See Attachment #5; see also DEIS, pg. ES-v (wherein “because the siting corridors are in a General habitat management area (HMA) for greater sage-grouse (Centrocercus urophasianus), the area is designated as open to wind energy development per BLM (2015)”). The DEIS did not adequately address these issues. The DEIS recognizes that the 2015 Idaho ROD-ARMPA (referenced as BLM 2015 in the DEIS) “established required design features (RDFs) for certain activities in all sage-grouse habitats” including requirements “to avoid certain actions within a specified distance of occupied leks.” DEIS, pg. 3-114; see also DEIS, pgs. 3-107 to 3-115. DEIS, Table 3.3-13 at pg. 3-114 lists the applicable distance buffers required for occupied leks that were applied as sideboards for all action alternatives to conform with throughout the DEIS analyses. However, the lek data disclosed in the DEIS is inadequate so as to prescribe the applicable RDFs, inclusive of buffers. Specifically, the DEIS only reports a reliance upon “desktop habitat assessment (WEST 2020) and preliminary consultation with IDFG,” DEIS, pg. 3-112, as the means for conducting aerial and ground lek surveys to “check known lek locations and identify new lek locations,” DEIS, pgs. 3-112 to 3-113. In fact, as to the later, the DEIS reported that “Aerial surveys for new leks were conducted in areas considered potentially suitable sage-grouse habitat and where known leks had recently been active.” Emphasis added. In other words, the surveys the DEIS relied upon only searched for new (or previously undocumented) sage grouse leks near “known lek locations” which were recently active. If new or previously undocumented sage grouse leks are present within other portions of the proposed Project area the aerial surveys that were conducted could not have discovered them because these areas were not searched. Thus, the DEIS considered and assessed the application of RDFs and other sage-grouse related management directions only to previously “know leks” that “had recently been active” not because there are no other active leks within the proposed Project area, but because the survey methodology used to search for undocumented leks failed to survey areas that are distant from the know active leks. See Attachment Nos. 6, 7. This eliminated any consideration or assessment of GHMA within the Star Lake Allotment for any leks, whether new, occupied, active, unoccupied, or not previously documented. This skewed the analysis in the DEIS relative to assessing sage grouse habitat use within the project area and in prescribing applicable sage-grouse management direction within (at least) the Star Lake Allotment. This is particularly concerning given the fact that with respect to sage grouse (among many other resources) the “impacts duration is estimated to be a total of 84 years” (DEIS, pg. 3-102). The duration of the project itself warranted a broader consideration and assessment of the sage grouse habitat and lek locations, whether occupied, active, or unoccupied. Permittees have observed and documented sage grouse occupying and using habitat within the Star Lake Allotment. Attachment #8 contains photographs of sage grouse taken in the Star Lake Allotment in the fall of 2021 and 2022 and early winter of 2022. Additional sage grouse observations have been made by the Permittees year-round in areas just south of Star Lake and near 26 Mile Lake, including observations in the spring period. Because these observations include sightings made during the breeding season, it is reasonable to expect that undocumented lek(s) exist within the Star Lake Allotment.	
11211-2	Patrick Kelly; Western Watersheds Project	Greater Sage-Grouse: We appreciate that as currently planned, the Project site appears to conform to the Idaho BLM sage-grouse plans’ prohibition against wind energy development in Priority Habitat Management Areas (PHMAs). However, the Project has been sited in sage- grouse General Habitat Management Area (GHMA), which means that it will negatively impact sage-grouse, a species that continues to decline in abundance in Idaho and the West (Coates et al, 2021).1 The draft EIS contains several concerning elements that would pose serious threats to sage-grouse if the Project were approved: 1) Lack of adequate GRSG data: The gaps in knowledge and data regarding sage grouse in the analysis area, especially lek data, is woefully and unacceptably inadequate for a project of this size, scale, and duration. In the DEIS, BLM identifies eight leks "within 6.8 miles of the siting corridors" that have an “undetermined management status” (3-113).2 The BLM appears to group these “undetermined” leks into two sub-categories: Leks not “surveyed or documented as active in the last 5 years”, or leks with “insufficient survey information” (DEIS at 3-113).3 There are multiple problems that arise from this: • BLM must apply the 2015 Idaho Sage-Grouse ARMPA-required protective lek buffers to the eight undetermined leks. It appears from the limited information in the DEIS that these leks were designated as occupied, and that BLM lacks the five consecutive years of survey data to now designate them as unoccupied. The 2015 ARMPA provides that “[t]o be designated unoccupied, a lek must be inactive . . . for five consecutive breeding seasons.”(BLM, 2015). A lek is “inactive” where survey data show there “[w]as no strutting activity throughout a breeding season.”(BLM, 2015). Absent five consecutive years of survey data demonstrating that these leks were inactive in each year, BLM cannot lawfully treat these leks as unoccupied. Out of the eight “undetermined” leks listed in the DEIS, seven of them were last surveyed in 2018, falling far short of the required five consecutive years of surveys needed to establish occupancy status.4 The eighth lek (4L008) was surveyed in 2020 and 2022 (not in 2021), which likewise falls short of the 5 consecutive year requirement under the ARMPA.5 Additionally, the “undetermined” status is not one recognized by the governing 2015 Idaho Sage-Grouse ARMPA. The ARMPA contains only four possible lek status designations —active, inactive, occupied, and unoccupied. That the state has applied an “undetermined” status to these leks does not allow BLM to depart from the management definitions and protections in its own RMP. (See Ctr. for Biological Diversity v. United States Bureau of Land Mgmt., No. 4:21-CV-00182-BLW, 2023 WL 387609, at *1 (D. Idaho Jan. 24, 2023)). •	In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM’s independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG’s definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent

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		Having insufficient survey information, by definition, cannot not allow for any conclusion to be reached as to the occupancy of the lek. Thus, BLM cannot write off any leks that lack data by simply claiming ARMPA compliance until they have definitively and appropriately established the occupancy status of the leks in question. Insufficient survey information does not legally or ecologically justify equating "undetermined" with "unoccupied", which is what BLM appears to be doing here. This is a pretty clear attempt to skirt the ARMPA buffer stipulations by not definitively establishing occupancy status. As already noted above, this is inconsistent with the 2015 Idaho Sage-Grouse ARMPA and is illegal. • As to these "undetermined" leks, it is also noteworthy and rather conspicuous that nearly all of them are much closer to the siting corridor than those listed as occupied, thus situating them to experience the most severe impacts from the Project (i.e. noise, dust, increased predation, habitat loss, etc). Undetermined leks 2J010-2J014, along with 2J017 and 2J021 are all extremely close to the siting corridor, with many of them listed as being "0 miles" away (DEIS, 3-113 and 3- 114). In other words, having insufficient survey information or otherwise not having confirmation of the occupancy status of these leks runs the risk of severely impacting any lekking grouse in these areas. BLM must gather the data and remedy this "insufficient survey information" in order to both follow the law and to avoid these potentially disastrous consequences.	change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a).
11211-6	Patrick Kelly; Western Watersheds Project	2) BLM does not adequately account for impacts on sage-grouse resulting from exponential increase in use of roads and associated noise: • The DEIS estimates that under the proposed action there will be an astonishing 2,427,698 vehicle trips associated with the construction, operation, and decommissioning of the project (Table 2-5).6 The analysis of sage-grouse impacts offered in the DEIS for such an incredible increase in vehicle traffic is woefully inadequate. While focusing almost exclusively on road noise impacts to lek sites, BLM offers little to no analysis of the impacts a massive network of heavily trafficked roads (both new and existing) will have on sage-grouse outside of the lek buffer. This is especially problematic given that BLM fully acknowledges that impacts from roads will extend well beyond lek buffer zones (i.e. beyond Spring SUAs) (DEIS,3-118 & 3-116). Citing a study done on road impacts to sage grouse, BLM acknowledges that roads can affect sage-grouse by fragmenting and altering habitat, increasing human presence (resulting in disturbance and displacement of birds), increasing the risk of collision with vehicles, potentially reducing nest initiation rates of hens (Lyon and Anderson, 2003), or increasing the distance hens move to find nest sites (DEIS, 3-123). Additionally, BLM openly states that road usage would increase both predation rates and habitat fragmentation (DEIS, 3-123).Yet, despite this acknowledgment of road impacts, BLM does not offer any analysis as to what these impacts will look like beyond generalized observations and quantification of functional habitat loss (DEIS, . How will this massive increase in road usage impact sage-grouse the population numbers and breeding success in the project area and the broader sage-grouse HAF units (i.e. Craters of the Moon & Timmerman Hills) Is there any estimate as to how many birds will be lost, displaced, or otherwise eliminated from the region? What does this mean for the broader sage grouse population in the Desert IHMA/PHMA/SFA areas to the north, where hard population triggers were hit in 2018 and 2019 and remain operational?(DEIS, 3- 112).	EIS Section 3.3.4.2.2 (Alternative B [Proposed Action]) Issue 2 analyzes effects within the full extent of increased noise from the project, not just in lek areas. "Noise could be up to 29.3 dBA (10 dBA more than existing background noise levels for unoccupied open rangeland, which is 19.3 dBA) within 6.8 miles of the siting corridors (Figure D-1 of Appendix 4 in SWCA [2022]) and attenuate to background levels beyond 6.8 miles." "Estimated noise levels from construction traffic at the closest occupied lek (approximately 3.1 miles from access road) would be 25.2 dBA for a traffic level of 400 vehicles per hour (SWCA 2022), a 9.2-dBA increase over the assumed existing daytime noise level of 16 dBA". A review of studies evaluating the effects of roads on sage-grouse is presented under EIS Section 3.3.4.2.2 (Alternative B [Proposed Action]) Issue 3. Any action alternative would require compensatory mitigation that would result in a net conservation gain for sage-grouse, as required by BLM (2015a).
11211-7	Patrick Kelly; Western Watersheds Project	3). BLM does not properly or adequately assess the population level impacts that will result from inevitable loss and fragmentation of Summer and Winter SUAs • With its exclusive focus on leks and lek buffers, BLM effectively ignores and/or avoids any meaningful analysis of the impacts to sage grouse populations that disruption of both Summer SUAs (late brood-rearing), and Winter SUAs will have. Since BLM includes lekking, nesting, breeding, and early brood-rearing habitat under the Spring SUAs, the lek buffers and mitigation measures they require only address impacts to those areas (DEIS, 3-108). This becomes particularly concerning when we see that 40% of the acreage in the siting corridor for the proposed action (Alt. B) is not within Spring SUAs, and is instead comprised of Summer and Winter SUAs (DEIS, 3-111). BLM bluntly states that this will lead to fragmentation of sage-grouse habitat by "adding turbines, new roads, fences, overhead 34.5-kV collector lines, 230-kV transmission lines, and 500-kV transmission lines in sage- grouse habitat (General HMAs)."(DEIS, 3-118). As BLM makes clear, these areas are already suffering from serious fragmentation and connectivity issues due to 75% of the "linkage areas" that connect seasonal habitats being rated as "marginal" or "unsuitable" (DEIS, 3-111). The further fragmentation and destruction of Summer and Winter SUAs that will result from the project, which BLM acknowledges, will likely finish off whatever habitat remains and completely sever sage grouse connectivity with the surrounding regions (esp. those regions north of Highway 24) (DEIS, 3-111). This habitat, and the sage grouse populations that depend upon it, are being quietly sacrificed and no meaningful analysis is provided to quantify what this entails for the future of sage grouse in the broader area. BLM must properly account for this loss and make clear assessments and provide robust analyses that show what kind of population loss this will entail.	Impacts were analyzed to seasonal use areas by calculating number of acres of ground disturbance from direct or indirect impacts (see EIS Table 3.3-25 [Summary of Impacts to Greater Sage-Grouse]). As described in EIS Section 3.3.4.4 (Compensatory Mitigation), these were used in calculating functional acres of habitat lost, which determines HQT mitigation debits, or how much mitigation would be required. The habitat within the project area is heavily impacted by disturbance and in poor condition. Any action alternative would require compensatory mitigation that would result in a net conservation gain, as required by BLM (2015a).
11327-8	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	IV. BLM must analyze Greater Sage-grouse population impacts based on new court decisions. Despite the proposed wind farm occuring within an area designated as open to wind energy development per BLM (2015), the current situation with Greater Sage-grouse (sage-grouse) is different. There is extensive new scientific information, there are continued declines of sage- grouse habitats and populations, and there are changes in the sagebrush landscape due to drought, fire and climate change. For these reasons, the BLM is pursuing revisions to the 2015 Plans. In regards to this proposed development, caution should be taken when pursuing actions that could cause further harm to Greater Sage-grouse. In March 2021, U.S. Geological Survey (USGS) researchers released a scientific report that provides one of the most comprehensive population trend modeling efforts ever undertaken for the species.24 The report describes an overall decline in the number of sage-grouse across the majority of their range, something previous studies have shown as well. Since 1965, sage-grouse populations have declined 80.7% range-wide (~3% decline per year), including areas where the decline has not been as severe. Since 2002, range-wide populations have declined 37%. Furthermore, 78% of leks have a greater than	Functional Habitat: The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. These habitat categories are used in the HQT process to determine debits (IDFG 2022a). Impacts were analyzed to seasonal use areas by calculating number of acres of ground disturbance from direct or indirect impacts (see EIS Table 3.3-25 [Summary of Impacts to Greater Sage-Grouse]). As described in EIS Section 3.3.4.4 (Compensatory Mitigation), these were used in calculating functional acres of habitat lost, which determines HQT mitigation debits, or how much mitigation would be required. The habitat within the project area is heavily impacted by disturbance and in poor condition. The project is proposed in General HMA, which has a lower breeding density of male sage-grouse. Even though all siting corridors are in a mapped General HMA, sagebrush cover is limited to a few portions of the project area. Any action alternative would require compensatory mitigation that would result in a net conservation gain, as required

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		50% probability of extirpation in the next 56 years. Idaho is no exception in exhibiting declining grouse populations. The state continues to have a declining trajectory from peak counts in 2016, with 2019 appearing to be a nadir and stronger declines occurring north of the Snake River.25 We believe the BLM should analyze three impacts on sage-grouse habitat and populations that were not included in the DEIS: functional habitat loss, risk of extirpation, and connectivity between sage-grouse populations. These three points are highlighted in the recent decision in Center for Biological Diversity v. U.S. Bureau of Land Management (D. Idaho, 2023). In this case, a federal judge ruled that the BLM's approval of the Caldwell Canyon phosphate mine failed to adequately assess impacts to sage-grouse, sage-grouse habitat, and habitat connectivity. Judge Windmill concluded that the BLM did not discuss or analyze the impacts of the approved project on functional habitat in areas outside of identified leks, and only accounted for the footprint of the project area- not taking into account the impacts outside of the project footprints, such as in the buffer zones.26 The court also concluded that the BLM failed to adequately consider and analyze whether the project would put the local sage-grouse population at greater risk of extirpation, despite the BLM contending that the issue of extirpation is critically interrelated to the loss of functional habitat and that habitat loss is addressed in their analysis. Finally, the court determined that the BLM violated NEPA by failing to consider how the mine would impact connectivity between sage-grouse populations.27 We do not believe the BLM has analyzed how the project would impact connectivity between sage-grouse populations and relies upon habitat connectivity to make its determination. As stated in the Caldwell Canyon ruling, "Population connectivity is critical for maintaining the viability of the species because it allows for genetic interchange and movements between breeding populations. Loss of population connectivity can increase population isolation and result in the loss of genetic diversity and extirpation from stochastic events, such as drought or wildfire."28 This recent decision should be carefully considered by the BLM in how it analyzed impacts to sage-grouse in the Lava Ridge DEIS.	by BLM (2015a). Both direct and indirect effects were considered and included in the EIS (Sections 3.3.4.2.2 through 3.3.4.2.5, Alternatives B through E) and used in the HQT analysis (IDFG 2022a, which is also EIS Appendix 7). The final HQT calculations for the Preferred Alternative are summarized in EIS Greater Sage-Grouse, Compensatory Mitigation section. Information about broader population trends across the sage-grouse range, across the state of Idaho, and at a local and regional level has been added to the Sage-Grouse Population and Distribution section. Information regarding population connectivity has been added to the EIS in Section 3.3.4.2 (Impacts), Issue 3 and analyzed in each alternative.
11346-2	George Parker, John Arkoosh	The DEIS failed to do a thorough inventory of sage grouse in the project area. The permittees of the Star Lake allotment have documented through photographic evidence and GPS waypoints, as well as testimony of permittees that sage grouse are much more prevalent than has been represented in the DEIS. Permittees further believe there are unidentified LEKs in the project area. This warrants further investigation before any build alternative is permitted. In recent years much of the area has burned, but the Star Lake allotment had tremendous stands of sage brush before these fires and still does have areas of older sage brush to support grouse. The brush is reestablishing in many areas. The idea of squandering the habitat that we have for all the wildlife of this project area, and that being endorsed by the Department of Interior is a concept so foreign to me that I cant comprehend it!	In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a). Even though all siting corridors are in mapped General HMA, sagebrush cover is limited to a few portions of the project area. The amount of seasonal sage-grouse habitat in these areas is shown in Figure 3.3-7 (Greater sage-grouse seasonal use areas) and Table 3.3-20 (Mapped Greater Sage-Grouse Seasonal Use Areas in the Analysis Area and Siting Corridors). Intact sagebrush habitat and known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because

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			they connect intact sagebrush. All disturbance was sited 3.1 miles away from leks, and seasonal timing restrictions in General HMAs will be required."
11527-6	Richard Stover; State of Idaho	Wildfire is one of the primary threats to greater sage-grouse habitat. If approved, the Project must ensure neither fire nor loss of habitat compromises Idaho's Sage-grouse Management Objectives. The DEIS fails to analyze fire risks associated with malfunctioning turbines, which can act as an ignition source for wildfire.	See response to comment 2100-5 (see in Table A-3e, Greater Sage-Grouse).
11527-7	Richard Stover; State of Idaho	The State of Idaho manages sage-grouse in accordance with the following key guidance documents: (1) Executive Order 2022-03 "Adopting Idaho's 2021 Sage-Grouse Management Plan and Idaho Sage-Steppe Mitigation Process," (2) "Idaho 2021 Plan: Policy for Greater Sage-Grouse Management in Idaho," (3) "Idaho Sage-Steppe Mitigation Principles," and (4) State of Idaho- BLM 2019 sage-grouse memorandum of agreement (MOA) as implemented consistent with BLM Instruction Memorandum 2021-038 (https://gov.idaho.gov/wp-content/uploads/2022/03/Attachment3_BLMMOA-FINAL.pdf). Accordingly, the final EIS must analyze a range of potential mitigation measures that offset adverse Project effects to sage-grouse based on results of the HQT and Idaho's key sage-grouse guidance documents. Moreover, the BLM must coordinate with the Project applicant and State of Idaho to develop and incorporate in the final EIS and ROD a Mitigation Plan that specifies how compensatory mitigation will adequately and effectively offset unavoidable adverse effects on sage-grouse.	The GRSG Mitigation Plan (Appendix U in MVE [2023]) will be updated prior to the notice to proceed for project construction to include more details on compensatory mitigation options. See also the Mitigation Framework for Greater Sage-grouse in EIS Appendix 4. Preference will be to offset impacts close to where the project impacts would be, i.e., at the fine-scale HAFs, then the conservation area, followed by the other conservation areas in Idaho.
11527-16	Richard Stover; State of Idaho	Currently the DEIS and its associated appendices do not disclose how compensatory mitigation will be implemented for adverse Project effects on sage-grouse. The State recognizes that the BLM is analyzing how the Project would potentially affect sage-grouse and is considering a range of potential mitigation measures to avoid and minimize adverse effects. This is evident in the DEIS sections discussing Required Design Features (RDFs), avoidance and minimization measures such as buffers and seasonal restrictions, and the State's Habitat Quantification Tool (HQT) Results for each DEIS action alternative. However, none of these DEIS sections discuss options that the BLM is analyzing as compensatory mitigation to offset unavoidable (i.e., residual) adverse Project effects on sage-grouse.	See response to comment 11527-7 (see in Table A-3e, Greater Sage-Grouse).
11534-16	Matt Arnold, William Eubanks	The DEIS May Underestimate Greater Sage-grouse Populations Section 3.3.4 of the DEIS discusses potential Project effects on the Greater Sage-grouse, a species whose "populations in Idaho have shown an overall declining trend since 1965." DEIS at 3-112. This discussion is entirely predicated on the Project proponent's surveys of the analysis area. Id. at 3-112–113 ("Aerial surveys for new leks were conducted in areas considered potentially suitable sage-grouse habitat and where known leks had recently been active"; however, "[n]o new lek locations were identified during aerial surveys."). Based upon their review of the DEIS's surveys and their intimate knowledge of the Project area and the resources contained therein, SLR and its members maintain that BLM has not conducted adequate surveys for the Greater sage-grouse and its leks. In support, they have attached photographs taken by members that are geo-tagged to locations not included in the agency or Project proponent's surveys. See Attach. (Greater Sage-grouse Sightings within Project Analysis Area). SLR, therefore, requests that these sightings be investigated by BLM and its impact analyses amended accordingly.	The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to construction, MVE's compliance manager will consult with IDFG for technical assistance and will conduct lek surveys on previously un-surveyed areas identified by MVE as marginal habitat. These areas will be surveyed by the compliance manager to search for leks that have not yet been identified. RDFs (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a). In addition, the most current and available lek count and sage-grouse telemetry data from IDFG were used, as required.
11535-14	Steven Andersen	The DEIS fails to adequately address and mitigate the irreparable harm the project will cause to the greater sage-grouse.30 The research and analysis provided by the agency relies on unsupported assumptions, based on inadequate observations of sage-grouse, causing the baseline numbers for comparative analysis to be grossly inadequate. The proposed impact duration is estimated at an astounding 84 years, which includes 34 years for the life of the project, and an additional 50 years for final reclamation. 31 This duration is highly concerning on its own, but even worse, it is still an underrepresentation of the actual impact duration given the unprecedented magnitude of the project, and the agency must take a harder look at the impacts to sage-grouse.32 The DEIS does not adequately address and alleviate the severe, irreparable impact to the greater sage-grouse. Wind requires less infrastructure but results in higher levels of habitat fragmentation, because their impacts are geographically scattered rather than concentrated.33 Not only does the DEIS fail to identify the specific location of the many oversized turbines, but the vague siting corridor it does identify fails to restrict wind energy site testing and monitoring and wind energy development from occupied and suitable habitat for special-status species, including the greater sage-grouse, where their direct and indirect adverse effects cannot be mitigated. The project fails to address how it will manage vegetation to restore the resiliency of ecosystem structure and function and reduce fragmentation of habitat for sage-grouse and other native species. Importantly, energy development should be discouraged in breeding habitats, but the project does not do so.34 In short, the DEIS falls well below the required standard and does not rigorously evaluate the negative impacts to the greater sage-grouse.	BLM (2015a) outlines a hierarchy of mitigation priorities, where projects should be designed to avoid and minimize impacts to the extent possible (mainly through project siting and seasonal restrictions for specific activities), and any remaining residual impacts should be addressed through compensatory mitigation. This is described further in Section 3.3.4.4 (Compensatory Mitigation). Intact sagebrush habitat and known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because they connect intact sagebrush. All disturbance was sited 3.1 miles away from leks, and seasonal timing restrictions in General HMAs would be required. As described throughout the EIS and as required in BLM (2015a), the project was designed to avoid placing infrastructure within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors). The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. The project is proposed in General HMA, which has low breeding density of male sage-grouse. Even though all siting corridors are in a mapped General HMA, sagebrush cover is limited to a few portions of the project area. Knick et al. (2013) and Row et al. (2018) have documented the importance of landscape-scale sagebrush cover for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013) and more than 25% sagebrush cover within a 18.6-mile (or 30-km) radius (Row et al. 2018). Even with the implementation of applicant-committed measures and other mitigation described in EIS Appendix 4, impacts to sage-grouse would remain. Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]). MVE has a set of options to provide compensatory mitigation for unavoidable impacts to greater sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4 (Mitigation).
11535-16	Steven Andersen	The DEIS relies on inadequate baseline data. Specifically, the agency purportedly relied on Idaho's Habitat Quantification Tool to estimate the number of sage-grouse and site scale. The functional acre debits are underestimated and fail to reflect mature sagebrush areas within the project areas, and fail to properly consider the degree to which the substantial impacts should affect debit calculations. There were no independent surveys conducted at proposed facility sites to determine impact on populations, and no meaningful cumulative impacts	Analysis of impacts to sage-grouse populations beyond the analysis area is out of scope for this EIS. However, information on population trends from Coates et al. (2021) range wide, within Idaho, and at local and regional levels relevant to the affected population were added in the Sage-Grouse Population and Distribution section of the EIS. The most current and available sage-grouse lek count and telemetry data from IDFG were used, as required by BLM (2015a). BLM (2015a), EIS Appendix 4, and EIS Section 3.3.4.1.3 (Sage-Grouse Management

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		analysis discussing existing conditions. Even more, the DEIS does not provide for varying degrees of protection (protective measures), and it is conclusory as to whether the project will cause sage-grouse to be listed as a threatened or endangered species. The DEIS also fails to consider that the sage-grouse range covers multiple states and connectivity of habitat requires a large-scale analysis that transcends a single state.	Requirements) lay out development restrictions and extra protections that the project is required to implement to reduce impacts to this sage-grouse population. The project was designed so that no infrastructure would be placed within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors). The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. These habitat categories are used in the HQT process to determine debits (IDFG 2022a).The project is proposed in General HMA, which has a lower breeding density of male sage-grouse. Only a portion of the project occurs in sage-grouse habitat. Additional protective measures for greater sage-grouse were included in EIS Appendix 4 in the Applicant-Committed Measures, Mitigation Required, and Additional Project-Specific Mitigations sections. The final HQT calculations for the Preferred Alternative are summarized in EIS Greater Sage-Grouse, Compensatory Mitigation section.
11535-17	Steven Andersen	The DEIS has not adequately addressed the proper management of the greater sage-grouse, i.e., population management, general habitat management, breeding habitat management, habitat protection, habitat restoration, etc..39 The DEIS also provides inadequate buffer zones to occupied leks. Before making management decisions, agencies should cooperate to first identify lek locations and determine whether a population is migratory or nonmigratory.40 In the case of migratory populations, migration routes and seasonal habitats must be identified to allow for meaningful and correct management decisions—the DEIS fails to do so.	Appendix B of BLM (2015a) states “In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.” BLM used the most current available sage-grouse lek count and telemetry data from IDFG, as required, and field surveys completed for the project. The areas identified as sagebrush habitat and the known lek locations were important factors used to help guide project siting and minimization measures (EIS Appendix 4). Functional habitat loss has been calculated by the State of Idaho (2021a) and debits for this project have been determined. Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]). BLM (2015a) determined lek buffer distances, which are summarized in EIS Table 3.3-23 (Greater Sage-Grouse Buffer Requirements).
11535-18	Steven Andersen	Further, the DEIS indicates only a 3.1-mile buffer from occupied leks, which is inadequate.42 There should be a 5-mile buffer between leks and wind turbines, which is impossible to determine at this point because the DEIS does not identify specific locations for the turbines.43 These guidelines should be implemented over an entire seasonal range.	The greater sage-grouse ARMPA (BLM 2015a) based lek buffer distances on the best available science (Manier et al. 2014). These buffer distances are summarized in EIS Table 3.3-23 (Greater Sage-Grouse Buffer Requirements). All leks must be at least 3.1 miles from the edge of the siting corridor. The locations of all turbines would be within the siting corridors. Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]).
11535-19	Steven Andersen	Noise impacts have not been properly analyzed as to sage-grouse impacts. The DEIS expressly states, “the effects of noise from construction and ongoing wind farm operation on sage-grouse have not been specifically studied….” 45 Even less, for a project of this unprecedented magnitude. Ultimately, increased difficulty in finding leks or assessing males on the leks may lead to lower female attendance on noisy leks compared with quieter locations.46 Males may also avoid leks with high levels of noise if they perceive that their vocalizations are masked.47 Noise also causes stress to sage grouse.48 There is strong support “for an impact of noise playback on stress levels, with 16.7% higher mean FCM [fecal corticoids, an index of stress] levels in samples from noise leks compared with samples from paired control leks.”49 “Taken together with results from a previous study finding declines in male lek attendance in response to noise playbacks, these results suggest that chronic noise pollution can cause greater sage grouse to avoid otherwise suitable habitat, and can cause elevated stress levels in the birds who remain in noisy areas.”50 Noise at energy development sites is less seasonal and more widespread and may thus affect birds at all life stages, with a potentially greater impact on stress levels.51 Therefore, “[t]he cumulative impacts of noise on individuals can manifest at the population level in various ways that can potentially range from population declines up to regional extinction. If species already threatened or endangered due to habitat loss avoid noisy areas and abandon otherwise suitable habitat because of a particular sensitivity to noise, their status becomes even more critical.52 The DEIS fails to adequately consider these irreparable impacts.	The greater sage-grouse ARMPA (BLM 2015a) determined lek buffer distances, which are summarized in EIS Table 3.3-23 (Greater Sage-Grouse Buffer Requirements). All leks must be at least 3.1 miles from the edge of the siting corridor. The effect of noise on sage-grouse is analyzed in detail in EIS Section 3.3.4.2.2 (Alternative B) Issue 2. The greater sage-grouse ARMPA (BLM 2015a) requires that activities produce no repeated or sustained behavioral disturbance (e.g., visual, noise over 10 dbA at lek) to lekking greater sage-grouse from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season. This measure would apply to the project as described in EIS Appendix 4 (Mitigation). Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]).
11535-21	Steven Andersen	Functional Habitat Loss: The DEIS analysis reflects only areas that would be impacted by direct disturbance—and even then, not sufficiently. Indirect habitat loss was not adequately considered, i.e., that loss which will occur beyond the area impacted by direct disturbance. Such loss may include powerline, road, and railroad avoidance, and fragmentation.54 All of this is significant because such loss can be larger than the project’s physical footprint (which in our case is massive given the scope of the project).55 None, or very little, of agency’s analysis discusses avoidance of habitat fragmentation, or the functional habitat outside of the leks.56 General discussions are insufficient.57 The agency appears to have accounted only for the footprint of the proposed project area and did not take into account the impacts outside of the project’s footprints, such as in the buffer zones (and as stated, the DEIS does not even set the specific location for the turbines). 58 Sage-grouse avoid intact habitat near powerlines, roads, structures, and human noise, and that anthropogenic disturbance can fragment sagebrush habitat into disjointed patches that are unusable to the species.59 The area of influence of roads and powerlines is said to extend roughly 0.6 miles beyond the actual line feature, which the DEIS does not adequately take into account.	Both direct and indirect effects were considered and included in the EIS (Sections 3.3.4.2.2 through 3.3.4.2.5, Alternatives B through E) and used in the HQT analysis (IDFG [2022a], which is also EIS Appendix 7).
11535-23	Steven Andersen	Connectivity Between Populations and Genetic Interchange: The DEIS fails to provide a detailed analysis (or any analysis at all) of connectivity and genetic interchange, which must be discussed separately. 65 Indeed, the DEIS only generally mentions connectivity by making statements such as, “[p]atch connectivity was marginal,” “[w]ildfire has…limited the amount of seasonal habitat and connectivity in this area,” and [c]onnectivity between SUAs was marginal.”66 Such scant analysis is grossly insufficient, and the agency does not even mention genetic interchange.67 This is highly concerning given that “maintenance of connectivity and reduction of fragmentation of sagebrush habitats is key to the long-term welfare of all sagebrush associated species.”68 Even	A discussion of connectivity between populations and genetic interchange has been added to Section 3.3.4.2 (Impacts), Issue 3, and an analysis of impacts on connectivity has been added to each alternative (Sections 3.3.4.2.3 through 3.3.4.2.6).

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		"small decreases in lek connectivity [can result] in large increases in the probability of lek abandonment,"69 which is more true given the unprecedented magnitude of the project. Connectivity between sage-grouse populations, or "population connectivity," refers to the ability of sage-grouse to intermingle with neighboring populations.70 "Genetic connectivity" means the extent to which separate populations of a species are able to share genes and thereby to maintain a healthy genetic diversity within each population.71 Connectivity is critical for maintaining the viability of the species because it allows for genetic interchange and movements between breeding populations.72 Loss of population connectivity can increase population isolation and result in the loss of genetic diversity and extirpation from stochastic events, such as drought or wildfire.73 The DEIS does not adequately address any of these important considerations. The agency must conduct a separate genetic connectivity analysis regarding separate sage grouse populations (concerning genetic interchange between otherwise separate sage grouse populations), which it did not do.	
11535-24	Steven Andersen	Cumulative Impact on Sage-Grouse: The cumulative impacts of the past, present, and reasonably foreseeable events and future projects on sage-grouse must be considered. However, the only substantive comment provided by the agency is, "[a]s more sage-grouse habitat is disturbed and converted [by other proposed renewable energy projects], sage-grouse activity and lek attendance may decrease."74 Such conclusory statement flies in the face of federal law. NEPA requires that an EIS consider the cumulative impact of the proposed action.75 "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions."76 General statements about possible effects and some risk, do not constitute a hard look.77 "The analysis must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects in the area."78 Further, the "cumulative impacts analysis must do more than merely catalogue relevant projects in the area."79 Instead, the agency must discuss and analyze the impacts of the projects "in sufficient detail to assist 'the decisionmaker in deciding whether, or how, to alter the program to lessen cumulative impacts.'"	The Cumulative Impacts section of the Greater Sage-Grouse section of the EIS (3.3.4.2.7) provides qualitative and qualitative analyses using the most up-to-date information on existing and reasonably foreseeable future projects within the greater sage-grouse analysis area. As stated in the EIS, "Future projects on federal lands would be held to the mitigation standards (for residual impacts after avoidance and minimization have been considered) identified by the applicable land use plan. Currently, BLM (2015a) requires a net conservation gain standard, as discussed in Section 3.3.4.4 (Compensatory Mitigation). Net conservation gain would be determined by the BLM in coordination with the State of Idaho and informed by the Idaho HQT (State of Idaho 2021a). Projects on state lands would be held to the State of Idaho's no net loss standard; no mitigation would be required for private lands." The "Mitigation Framework for Greater Sage-grouse" in EIS Appendix 4 further describes the net conservation gain. The following text was added under "Connectivity" in Section 3.3.4.2.7 (Cumulative Impacts): "Connectivity between lek 4L160 and leks 4L152 and 4L159, as well as between lek 4L160 and the closest SUAs, would be reduced by the Lava Ridge Wind Project alone. With additional future projects in the region, connectivity with leks north and east of siting corridors, e.g., Big Desert and Craters of the Moon HAF fine-scale areas, is likely to be impacted. These areas have been identified as important areas in maintaining genetic connectivity locally and range-wide (Cross et al. 2018, 2023). With additional future projects in the region, connectivity to the south across the Snake River Plain would be reduced. Despite I-84, existing anthropogenic disturbance, and agriculture, there are still some low levels of genetic connectivity between the siting corridors and south across the Snake River Plain (Cross et al. 2023). The Lava Ridge Wind Project and additional future projects could decrease the remaining genetic connectivity across the Snake River Plain between the two contiguous landscapes and concentrations of genetic connectivity and importance for sage-grouse."
11598-17	Idaho Conservation League	Greater sage-grouse and the Habitat Quantification Tool Analysis ICL appreciates that LS Power ultimately dropped wind proposals for the Browns Bench/China Mountain area and for the Big Cedar Project west of Oakley because they were in Priority and Important Sage-grouse Habitat Management Areas, and because both projects had high potential for conflicts with sage-grouse. According to the Amended Resource Management Plans for Greater Sage-grouse, the Lava Ridge project proposal is located outside of priority and Important Sage-grouse Habitat Management Areas, but is instead located within General Habitat or entirely outside Sage Grouse Management. According to both the State of Idaho's Sage-grouse Management Plan and the BLM's Amended Resource Management Plans, general habitat remains open for renewable energy development, among other multiple uses. General sage-grouse habitat contains approximately one-third of the remaining sage-grouse habitat in the state but only 2.5% of male sage-grouse. Still, the BLM has to carefully consider impacts to sage-grouse populations in general habitat. We note that the recent Caldwell Canyon decision faulted the BLM for not considering population-level impacts from mining related activities and for not considering direct, indirect and cumulative effects on sage-grouse.12 The issues of cumulative impacts and population connectivity is particularly pertinent given the Taurus Project and others: Further, the "cumulative impacts analysis must do more than merely catalog relevant projects in the area." Indigenous Env. Network v. U.S. Dept. of State, 347 F. Supp. 3d 561, 578 (D. Mont. 2018). Instead, the agency must discuss and analyze the impacts of the projects "in sufficient detail to assist 'the decisionmaker in deciding whether, or how, to alter the program to lessen cumulative impacts.' " Id. (citing Great Basin Mine Watch v. Hankins, 456 F.3d 955, 971 (9th Cir. 2006)).13 The same case found that the BLM's Habitat Quantification Tool and compensatory mitigation measures were consistent with the Amended Resource Management Plan Amendments and achieved the required "net conservation gain" for greater sage-grouse. If the project proceeds, we recommend utilizing the Supplemental DEIS to describe the proposed mitigation measures in greater detail. Such measures need to account for mitigation project failures, time delays, durability, and additive nature of the projects, among other factors. While the ARMPA requires mitigation measures for sage-grouse, the DEIS notes that mitigation may be extended to other resources: and …[F]or resources without legal protections, the BLM would determine if compensatory mitigation is warranted. This would be based on the resource and its status (rarity, population trend, etc.), the type and intensity of residual effects, and the existing condition of the resource with relevancy to the siting corridors. The BLM can implement other mitigation standards, such as achieving net benefit, consistent with applicable law, when the BLM determines such standards are required to achieve resource objectives.14 We note that there are a number of resource objectives related to wildlife, vegetation and recreation that could be affected by the Lava Ridge Project that could meet this determination. While we are concerned about the effects of the Lava Ridge project on sage-grouse in and around the project area, a climate model by the Audubon Society15 shows that sage-grouse habitat across the entirety of southern Idaho is likely to be lost under	BLM (2015a) outlines a hierarchy of mitigation priorities, where projects should be designed to avoid and minimize impacts to the extent possible (mainly through project siting and seasonal restrictions for specific activities), and any remaining residual impacts should be addressed through compensatory mitigation. This is described further in Section 3.3.4.4 (Compensatory Mitigation). Restoration efforts for sagebrush habitat can require long time scales depending on the condition the site is in, particularly the resilience of an area to disturbance and resistance to invasive annual grasses (Pyke et al. 2015). The BLM would require compensatory mitigation as described in EIS Section 3.3.4.4 (Compensatory Mitigation) for any action alternative and would require compensatory mitigation to result in a net conservation gain, as stipulated by BLM (2015a). MVE has a set of options to provide compensatory mitigation for unavoidable impacts to greater sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4 (Mitigation). Regardless of the mitigation mechanism selected, the BLM would use all the necessary mitigation mechanisms and hold all compensatory mitigation mechanisms to meet high and equivalent standards, including measurable mitigation outcomes and performance standards, a development plan, monitoring and maintenance, durability (biological, financial, and real estate), accounting, reporting, and adaptive management, as outlined in the BLM Mitigation Policy (BLM IM 2021-046; H-1794-1, Chapter 3.5 I.1 in BLM [2021c]). An analysis of population connectivity and genetic diversity has been added to Section 3.3.4.2.7 (Cumulative Impacts, Connectivity), and connectivity and genetic diversity are analyzed in Section 3.3.4.2 (Impacts), Issue 3. See also response to comment 11535-24 above. Regarding climate change and future suitability of greater sage-grouse habitat in southern Idaho, the EIS evaluates peer-reviewed studies (Homer et al. 2021; Rigge et al. 2021), which predict future reduction in suitable habitat for greater sage-grouse in the analysis area due to climate change.

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		increasing climate temperatures. See figures 2-4 below. Figure 2. Modeled sage-grouse habitat under current climatic conditions. 15 https://www.audubon.org/field-guide/bird/greater-sage-grouse Figure 3. Modeled sage-grouse habitat range under 1.5 degree C warming. Figure 4. Modeled sage-grouse habitat range under 3 degree C warming. As such, it is important to understand that in order to protect and restore sage-grouse populations, we are going to have to find suitable areas - ideally outside of habitat for sage-grouse and other wildlife - to develop renewable energy sources at a utility scale.	
11871-41	WildLands Defense	Report at M-18 The report notes that "undocumented leks were observed during the aerial searches. Displaying males were recorded at two of the three leks (4L152 and 4L159) during ground and aerial surveys. Although no displaying males were recorded at lek 4L160 during surveys, IDFG reported that three males were observed by an IDFG biologist". The report included a review of GRSG telemetry data provided by IDFG, which indicate that the three leks within the Project area appear to be isolated from other GRSG breeding populations in the area, and insufficient data is available to determine whether there is movement between the three leks within the Project area. "Lek monitoring was conducted by WEST in 2021, and GRSG were observed at all three leks during the 2021 surveys. Lek 4L160 had a peak male count of 10 individuals, Lek 4L159 had a peak male count of 16, and Lek 4L152 had a peak male count of three (Figure 6). Lek records for 4L152 began in 2010. Counts at this lek have generally been on a downward trended, with males recorded in 2010, 18 in 2018, and eight in 2019. Trend data is unavailable for leks 4L159 and 4L160, which were discovered in 2018 and 2019, respectively". M-20. Detailed analysis of trends and loss of leks for all periods of time for Snake river plain leks must be provided, including detailed discussions of tripped triggers and what specifically BLM Has done in response. We have not observed any significant actions undertaken to protect populations and habitats. In fact, we have observed Idaho Falls BLM covering up the fact that triggers have been tripped when attempting to construct huge new livestock water pipelines (near Arco) or increase spring grazing on top of sage-grouse leks (Twin Buttes decision). Moreover, winter 2023 is likely to have taken a significant toll on remnant populations of Sage-grouse across the region with deep snow occurring in a landscape that has suffered large-scale loss of sage and other shrubs, and where BLM fire rehab remains focused on livestock forage seeding and herbicide use – to the detriment of sage recovery. Arkle et al. 201 describe how BLM livestock forage-centered fire rehabs are large-scale failures for sage-grouse and wildlife M-21 proceeds to treat the sage-grouse populations as a sacrifice to the wind industry, stating: "The results of the analysis indicated the Project will likely have some impact on the local GRSG populations and that these impacts are likely to be small at the level of the regional subpopulation, given the small local population and marginal habitat near the Project identified in the assessment. Placement of project infrastructure in areas with existing development and avoidance of placement in functional GRGS habitat to the extent possible has the potential to minimize the impact of new disturbance to the landscape by co-location. As such, the Project was modified to remove turbines from federal land within 3.1 mi of the three grouse leks in the Project area".	In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a). The sage-grouse population trends both locally and regionally are described in EIS Section 3.3.4.1.2 (Sage-Grouse Population and Distribution). This section discloses the status of leks within 6.8 miles of the siting corridors, population trends, and adaptive management population triggers. This EIS analysis recognizes these triggers and evaluates impacts as BLM has prescribed in their resource management plan for sage-grouse (BLM 2015a). As described in "Sage-Grouse Distribution and Abundance", populations across Idaho have been consistently below the 2011 baseline in Idaho, and these declines tripped adaptive management population triggers in Important HMAs (since 2018) and Priority HMAs (since 2019) in the Desert mid-scale area that are currently operational (i.e., the populations have not increased to the 2011 baseline or above, and the triggers cannot yet be removed [State of Idaho 2022]). According to the greater sage-grouse ARMPA (2015a): Designate and manage General HMA as open for wind and solar testing … subject to RDFs and buffers. The BLM must analyze the effects of the project based on the current habitat data available. BLM (2015a) outlines a hierarchy of mitigation priorities, where projects should be designed to avoid and minimize impacts to the extent possible (mainly through project siting and seasonal restrictions for specific activities), and any remaining residual impacts should be addressed through compensatory mitigation. This is described further in Section 3.3.4.4 (Compensatory Mitigation). Intact sagebrush habitat and known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because they connect intact sagebrush. All disturbance was sited 3.1 miles away from leks (there are 3 within 6 miles of the siting corridors). The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. The project is proposed in General HMA, which has low breeding density of male sage-grouse. Even though all siting corridors

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			are in a mapped General HMA, sagebrush cover is limited to a few portions of the project area. Seasonal timing restrictions in General HMAs will be required. The project is in an area heavily impacted by existing disturbance. Even with the implementation of applicant-committed measures and other mitigation described in EIS Appendix 4, impacts to sage-grouse will remain. Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]). MVE has a set of options to provide compensatory mitigation for unavoidable impacts to greater sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4.
11871-54	WildLands Defense	We stress that flight diverters can fall off. We observed that with China Mountain wind MET tower guy wire diverters. This also happens all the time with BLM Sage-grouse fence diverters – they fall off, the reflective material falls off plastic, they are largely invisible in snow-scapes (Fite field observations in southern Idaho).	Compensatory mitigation details are in the GRSG Mitigation Plan (Appendix U in MVE [2023]). Mitigation will be added including maintenance on flight/fence diverters every 5 years (based on observations from BLM sage-grouse specialists in Idaho), and diverters must be replaced following a wildfire.
11871-70	WildLands Defense	Sage-grouse Adverse Impacts There is ever-growing scientific information on industrial energy and other threats to Sage-grouse. See for example: https://www.researchgate.net/publication/241908360_Greater_Sage-Grouse_Habitat_Use_and_Population_Demographics_at_the_Simpson_Ridge_Wind_Resource_Area_Carbon_County_Wyoming Johnson et al. 2012. Greater Sage-Grouse Habitat Use and Population Demographics at the Simpson Ridge Wind Resource Area, Carbon County, Wyoming. This was a WEST study, so is likely biased towards industry. It found that lek size decreased. This was a much larger population than at Lava Ridge– with 14 active leks, 37 birds mean lek size, 513 birds tallied. Lava ridge is highly likely to wipe out the leks.	The effects of wind energy projects on sage-grouse are detailed in Section 3.3.4.2.2 (Alternative B [Proposed Action]) Issue 3. The project is proposed in General HMA, which has a low breeding density of male sage-grouse. Even though all siting corridors are in a mapped General HMA, sagebrush cover is limited to a few portions of the project area. The presence of suitable habitat indicates that sage-grouse use is likely limited to the eastern and northern portions of the siting corridors (see Figure 3.3-7; Table 3.3-22). The area with sagebrush has low cover and is in an area impacted by existing disturbance, including croplands adjacent to the south and west of the project. Intact sagebrush habitat and known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because they connect intact sagebrush. All disturbance was sited 3.1 miles away from leks, and seasonal timing restrictions in General HMAs will be required. As described in EIS Section 3.3.4.2.2 (Alternative B [Proposed Action]), Smith et al. (2016) demonstrates the risk of leks disappearing with increased proportion of cropland on the landscape in Montana.
11871-71	WildLands Defense	Heterogeneity in the response of individuals and populations to wind-energy development is consistent with previous analyses of the effects of renewable energy on wildlife (Smith and Dwyer 2016, Coppes et al. 2020). It is also consistent with studies of how prairie grouse respond to other forms of infrastructure. For example, although roads, powerlines, and oil and gas development may have negative effects on survival and habitat use of prairie grouse (Hagen 2010, Hovick et al. 2014, Peterson et al. 2020), the magnitude of these effects and distance at which they are detectable is highly variable among species and locations (see also Northrup and Wittemyer 2013, Gregory and Beck LeBeau et al. (2014) reported that survival of greater sage-grouse nests and broods declined with proximity to a wind turbine (nest survival declined 7.1% with every 1-km increase in proximity to a turbine; brood survival declined 38.1% with every 1-km increase in proximity to a turbine).	The LeBeau et al. (2014) citation has been added to Section 3.3.4.2.2 (Alternative B [Proposed Action]).
11871-74	WildLands Defense	Three known leks within 6 miles of the siting corridors (4L160, 4L159, and 4L152) were checked in March and April 2020 and 2021, and birds were observed (either by WEST or by the BLM) at all three leks during each round of survey (WEST 2020, 2021). The results of the desktop habitat assessment and lek surveys indicate that sage-grouse habitat and use are likely limited to the eastern and northern portions of the siting corridors (see Figure 3.3-7; Table 3.3-12). The areas identified as sagebrush habitat and the known lek locations were important factors used to help guide project siting and minimization measures (Section 2.3.4, Avoidance and Minimization, and EIS Appendix 4, Mitigation). Eight leks within 6.8 miles of the siting corridors have an undetermined management status; these leks have not been surveyed or documented as active in the last 5 years, or they have insufficient survey information to be designated as unoccupied (Table 3.3-12). The lek buffers in BLM (2015a) only apply to occupied leks (as detailed in the section below and in BLM [2015a]).3-113, -114. WHY wasn't the status of these leks determined?? Where is data for all lek routes and counts at all leks for all periods of time known for – in the local and regional area. There have in reality been drastic declines in Sage-grouse in much of this area, with large gaps in opccurrence opening up as habitat has become lost and/or perforated.	According to the greater sage-grouse ARMPA (2015a, Idaho) the definitions for an unoccupied status are as follows: An unoccupied lek is one that has not been active for five consecutive years. To be designated unoccupied, a lek must be inactive (see above criteria) for five consecutive breeding seasons. Appendix B of BLM (2015a) states "In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency." The most recent counts for leks 4L152, 4L159, and 4L160 occurred in 2023, and for 4L008 in 2022. In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent

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			change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. Intact sagebrush habitat and known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because they connect intact sagebrush. All disturbance was sited 3.1 miles away from leks, and seasonal timing restrictions in General Habitat Management Areas will be required.
11871-108	WildLands Defense	Kirol et al. 2020.Greater Sage-Grouse Response to the Physical Footprint of Energy Development Christopher P. Kirol, Kurt T. Smith, Nicholas E. Graf, Jonathan B. Dinkins, Chad W. Lebeau, Thomas L. Maechtle, Andrew L. Sutphin, Jeffrey L. Beck First published: 05 March 2020 https://doi.org/10.1002/jwmg.21854 This study Abstract states: Energy infrastructure and associated habitat loss can lead to reduced reproductive rates for a variety of species including the greater sage-grouse (Centrocercus urophasianus). Our goal was to refine our understanding of how the physical footprint of energy development relates to sage-grouse nest and brood survival. Our survival analyses were conditional upon the amount of surface disturbance female sage-grouse were exposed to during reproductive stages. We quantified levels of exposure and compared them to the surface disturbance levels of the surrounding area. From 2008–2014, we collected data in 6 study areas in Wyoming, USA, containing 4 primary types of renewable and nonrenewable energy development. Our research focused on press disturbance (i.e., disturbance sustained after initial disturbance and associated with existing energy infrastructure and human activity). Our results suggest exposure to press disturbance during nesting and brood-rearing was related to lower nest and brood survival, which manifested at different spatial scales. Our analysis of nest survival suggested that the likelihood of a successful nest was negatively associated with the amount of press disturbance within an 8-km² area. Broods exposed to any press disturbance within a 1-km2 area were less likely to survive compared to broods not exposed to press disturbance. Female sage-grouse consistently used habitat with lower disturbance levels during reproductive periods. Greater than 90% of nest and brood-rearing locations were in habitat with <3% press disturbance within a 2.7-km2 area. Our research links surface disturbance associated with press disturbance to reproductive costs incurred by sage-grouse exposed to diverse energy development. Our results demonstrate a pattern of female avoidance of areas where press disturbance was high during nesting and brood-rearing and survival of nests and broods were highest in areas that had the least amount of disturbance. Our findings underscore the importance of minimizing disturbance to maintain viable sage-grouse populations".	Issue 3 in EIS Section 3.3.4.2.2 (Alternative B [Proposed Action]) was updated to include this citation to support the effects of energy disturbance on nest and brood survival and hen avoidance that were already stated there.
11871-109	WildLands Defense	BLM must conserve, enhance and restore sage-grouse habitats and populations. Triggers have been tripped in the population The 2015 Idaho-SW MT ARMPA: https://eplanning.blm.gov/public_projects/lup/103344/143603/176718/2015_IDMT_ARMPA.pdfImplement the adaptive management plan, which allows for more restrictive land use allocations and management actions to be implemented if habitat or population hard triggers are met. MD SSS 6: The management area map and Biologically Significant Unit (BSU) baseline map will be re- evaluated in conjunction with plan evaluation processes (i.e. approximately every 5 years). This re- evaluation can indicate the need to adjust PHMA, IHMA or GHMA or the habitat baseline. These adjustments can occur upon completion of the appropriate analysis and process (e.g., plan amendment) to review the allocation decisions based on the map. Results from the Wildfire and Invasive Species Assessments, such as identified focal or emphasis areas will also be used to help inform mapping adjustments during this evaluation. MD SSS 8: Idaho BLM will annually update the Key Habitat map, in order to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year. This map also identifies potential restoration areas (perennial grassland annual grasslands, conifer encroachment and recent burns). This map a broad scale current vegetation map that changes as habitat is lost or restored. The Key Habitat Map is not an allocation decision such as PHMA, IHMA, and GHMA. Updates to the map will also occur if it is determined that mapping errors or omissions have occurred, or that radio-telemetry studies indicate that GRSG are consistently utilizing an area. Updates are also intended to capture recommendations by the field offices, GRSG Local Working Groups, or agency partners in GRSG conservation. Project-level evaluations of GRSG habitat during the NEPA process can also be used to inform the annual update. MD SSS 11: Idaho: Use hard and soft population and habitat triggers to determine an appropriate management response as described in MD SSS 16 to MD SSS 26. Hard and soft triggers responses are applied at the Conservation Area (MD SSS-1) scale (Appendix E). https://www.arcgis.com/apps/mapviewer/index.html?panel=gallery&layers=af37f0eb7ebb4883af1cfc6aefb7cc8a BLM mapping	As described in Section 3.3.4.1.2, populations across Idaho have been consistently below the 2011 baseline in Idaho, and these declines tripped adaptive management population triggers in Important HMAs (since 2018) and Priority HMAs (since 2019) in the Desert mid-scale area that are currently operational (i.e., the populations have not increased to the 2011 baseline or above, and the triggers cannot yet be removed [State of Idaho 2022]). This EIS analysis recognizes these triggers and evaluates impacts as BLM has prescribed in their resource management plan for sage-grouse (BLM 2015a). The BLM must analyze the effects of the project based on the current habitat data available.
11871-110	WildLands Defense	IDAHO 2006 GRSG Plan The above map shows the status of habitats a mere 17 years ago – and since this time BLM and the state have down-graded habitats, vast areas have been lost in fore, and invaded by weeds. The harmful Gateway West lines are being punched in spawning a huge amount of energy sprawl just like Lava Ridge	The Gateway West transmission line is described in EIS Section 3.1.1 (Existing and Future Trends and Actions). It was added specifically to EIS Section 3.3.4.2.7 (Cumulative Impacts).

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11978-119	Magic Valley Energy, LLC	21. Section 3.03.4 Issues Analyzed in Detail “The following assumptions were used for analyzing impacts to avian populations:” ‘Avian populations’ is used, when this section is specific to sage-grouse. MVE requests specifying this language: “The following assumptions were used for analyzing impacts to sage-grouse:”	This particular sentence in the EIS has been edited to read “The following assumptions were used for analyzing impacts to sage-grouse:”
11991-11	Julie Abo	I heard that new federal guidance on Sage Grouse is imminent this summer. It should be a prerogative for the BLM and Department of the Interior to hear the new guidance before moving forward.	The greater sage-grouse ARMPA is currently under revision. It would be speculative for BLM to predict the outcome of the revisions, and BLM is required to respond to MVE’s ROW application for this project. Guidance documents applicable to the project include BLM SFO’s 1986 monument RMP (BLM 1986), as amended, and the greater-sage-grouse ARMPA (BLM 2015a). Bureau of Land Management (BLM). 1986. *Monument Resource Management Plan.* January. Shoshone District, Idaho. Available at: https://eplanning.blm.gov/public_projects/lup/36121/42518/45285/monumentRMP_ok.pdf. Accessed February 10, 2021.
12288-2	Susan Jesser	Who paid the bill for Fish and Game to collar and monitor sage-grouse, deer and pronghorn? From what I understand Magic Valley Energy didn't cover these costs. Clarification would be appreciated. Thank you.	IDFG data for grouse, deer, and pronghorn used in the EIS are from ongoing IDFG wildlife projects that cover a broad area, which is larger than but includes the project area. Many IDFG projects began before MVE’s ROW permit application was submitted. State wildlife agencies typically respond to research needs across a variety of land uses without receiving specific funding.
12934-7	Rob Thornberry, Theodore Roosevelt Conservation Partnership	Consider cumulative effects on sage grouse. The TRCP appreciates the applicant’s willingness to consider the ramifications of utility-scale wind power on sage grouse populations, and we are appreciative of the actions the applicant has already taken to avoid impacting the imperiled bird. Still, we recommend including more analysis and management actions to address the cumulative impacts of wind power in general sage grouse habitat.	Impacts on sage-grouse from energy development documented in peer-reviewed scientific literature are evaluated in EIS Section 3.3.4.2 (Impacts [to Greater Sage-grouse]). All known evidence-based management recommendations to reduce impacts to sage-grouse would be implemented, as described in EIS Appendix 4. A more detailed analysis of cumulative impacts is now included (Section 3.3.4.2.7).
12988-11	Melody Asher	DEIS 3.3.4.2.6 CUMULATIVE IMPACTS Your DEIS says "The trend for increased renewable energy development in the analysis area (see Section 3.3.4.1.4, Existing and Future Trends and Actions) and the potential additive or synergistic effects of other Lava Ridge Wind Project Draft Environmental Impact Statement 3.3 Avian and Bat Species 3-126 renewable energy projects (of similar size and scale) in combination with the Lava Ridge Wind Project would compound habitat loss and fragmentation on greater sage-grouse populations and their habitats. As more sage-grouse habitat is disturbed and converted, sage-grouse activity and lek attendance may decrease. Additional construction and operation of projects would lead to more anthropogenic noise sources and perching opportunities for sage-grouse predators. The potential effects of the expansion of wind energy on sage-grouse populations would depend on a number of site-specific variables at each project location, the number and size of infrastructure, and the implementation and effectiveness of mitigation measures t.o reduce impacts." Greater Sage Grouse are having a rough enough time already. I believe that Alternative E is the alternative that actually has more sagebrush as compared to much of the rest of the project area (most being more grass and weeds). This species could end up on the ESA list so I think losing this sagebrush is just another "straw on the back of the camel". I think sagebrush areas should not be developed. Habitat loss is the threat for this species.	See response to comment 8376-3 (see in Table A-3e, Greater Sage-Grouse).
12988-12	Melody Asher	DEIS 3.3.4.3 Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity Your DEIS says "All action alternatives would result in irretrievable impacts to individual sage-grouse from noise and increased human presence; direct mortality from vehicle strikes and collisions with project infrastructure; and the loss, fragmentation, and degradation of their habitat over the 34-year life of the project. A number of mitigation measures would be implemented to minimize the potential for these effects. Effects from noise, increased human presence, and direct mortality, as well as impacts to habitat quality from the presence of project infrastructure, would occur over the 34-year life of the project; however, these effects would not be considered irreversible because any residual habitat impacts would be offset through compensatory mitigation required by the SLM and thus would not result in a trend toward listing under the ESA or a loss of populationviability. The effects to greater sage-grouse from habitat loss and fragmentation could persist for an additional SO years following decommissioning (84 years total) but would not be considered irreversible because the SLM would require compensatory mitigation to offset these impacts and because much of the habitat would be restored and reclaimed in the long term." You sound highly optimistic. Is there anyplace in the United States where anyone has rehabbed sagebrush steppe for Greater Sage Grouse and they have returned??? I would have to disagree that the area would be recovered in 84 years. I believe once that much of the soil has been disturbed and the sagebrush and forbes gone and then you add in climate change the area has a very good chance of never recovering in several human lifetimes if ever. You can throw money at a project but if there is not enough precipitation over years it will fail anyway. I also have doubts that enough money can set aside (bonding) to pay for this rehabilitation that far in the future.	BLM (2015a) outlines a hierarchy of mitigation priorities, where projects should be designed to avoid and minimize impacts to the extent possible (mainly through project siting and seasonal restrictions for specific activities), and any remaining residual impacts should be addressed through compensatory mitigation. This is described further in Section 3.3.4.4 (Compensatory Mitigation). Referenced from the draft EIS 3-103. Restoration efforts for sagebrush habitat can require long time scales depending on the condition the site is in, particularly the resilience of an area to disturbance and resistance to invasive annual grasses (Pyke et al. 2015). The BLM would require compensatory mitigation as described in EIS Section 3.3.4.4 (Compensatory Mitigation) for any action alternative and would require compensatory mitigation to result in a net conservation gain, as stipulated by BLM (2015a). MVE has a set of options to provide compensatory mitigation for unavoidable impacts to greater sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4.
13008-15	Scott Hauser	Lastly, 4) Are the locations of sage-grouse leks being accounted for when planning the route of the roads?	Yes, the project was designed so that no infrastructure, including roads, would be placed within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors).
13012-3	Heather Saunders	We are also concerned about the impact on the near threatened Greater Sage Grouse, a population for which the Department of the Interior is working to establish greater protections. We don't want our wildlife habitats destroyed and this particular habitat already n eds restoration. How long will construction of this facility delay that restoration?	BLM (2015a), EIS Appendix 4 (Mitigation), and EIS Section 3.3.4.1.3 (Sage-grouse Management Requirements) describes all mitigation measures the project is required to implement to reduce impacts to this sage-grouse population. The project was sited to avoid placement of infrastructure within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors). The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. The project is proposed in General HMA, which has low breeding density of male sage-grouse. Only a portion of the project occurs in sage-grouse habitat. There are three active leks within the study area. Intact sagebrush habitat and

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			known lek locations were important factors used to help guide project siting and avoidance and minimization measures (see Appendix U [GRSG Mitigation Plan] in MVE [2023]). With the exception of Alternative B, areas north of ID 24 were initially avoided because it connects intact sagebrush. All disturbance was sited 3.1 miles away from leks, and seasonal timing restrictions in General Habitat Management Areas will be required. As described in EIS Appendix 4, Mitigation, MVE would undertake restoration actions as soon as possible after completion of ground-disturbing activities to reduce the amount of habitat converted at any one time and to speed up the recovery to natural habitats. The BLM would require compensatory mitigation, as described in EIS Section 3.3.4.4 (Compensatory Mitigation), for any action alternative and would require compensatory mitigation to result in a net conservation gain, as stipulated by BLM (2015a). MVE has a set of options to provide compensatory mitigation for unavoidable impacts to greater sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4.
2100-5	Office of Governor Brad Little, Office of Lieutenant Governor Scott Bedke, Office of US Senator Mike Crapo, Office of US Senator Jim Risch, Office of Congressman Mike Simpson	We question whether aerial fire suppression capabilities are compromised by hundreds of 600-feet-plus tall turbines in an area prone to wildfire. Fires are one of the primary threats to greater sage-grouse, and the BLM needs to ensure neither fire nor loss of habitat compromises Idaho's Sage-grouse Management Objectives. The BLM needs to ensure that pilots can effectively suppress wildfires within and adjacent to the proposed project area.	EIS Section 3.3.4.1.4 (Existing and Future Trends and Actions) describes how wildfire has changed and will continue to change habitat for sage-grouse. Additional text was added to EIS Section 3.7.1.2.2 (Alternative B [Proposed Action], Response and Suppression) regarding potential impacts to fire suppression from the project. Though the project would reduce aerial fire suppression options, it would increase surface access for engine and ground suppression crews. Therefore, the project is not anticipated to change total wildfire suppression.
3046-1	Cameron Stauffer	According to the EIS for the Lava Ridge project, "even with the implementation of applicant-committed measures and other mitigation described above (and in EIS Appendix 4), impacts to sage-grouse would remain." According to the BLM, "Greater sage grouse populations have been in decline for at least the last six years." If we are to reverse the loss of the Greater sage grouse and the sage brush sea habitat, there must be massive action. Action different than what has been proposed in this EIS. "If there is any hope to conserve greater sage grouse and the Sagebrush Sea ecosystem that supports hundreds of wildlife species, we need a bold paradigm shift in this next round of greater sage grouse plan revisions. Tweaking around the edges won't cut it,	As described in EIS Section 3.3.4.4 (Compensatory Mitigation), the BLM would require compensatory mitigation for any action alternative and would require compensatory mitigation to result in a net conservation gain, as stipulated by BLM (2015a).
3046-2	Cameron Stauffer	The current EIS is using plans and strategies that have not helped Greater sage grouse. Furthermore, the BLM under the Biden administration, was supposed to have a new plan in 2022 and is scheduled to be out in 2023. According to E&E news, "The bureau, which has reviewed more than 300 peer-reviewed studies that have been published since 2015, is considering major changes, including possibly redesignating some core sage grouse territory into "areas of critical environmental concern," which would add new restrictions on everything from energy development to recreational activities across potentially hundreds of thousands of acres." The timing of this EIS is inappropriate. According to the EIS there are at least eight Lek sites that are undetermined. There needs to be major changes in preserving the sage brush sea and this EIS is currently planning with inadequate information as it concerns to the Greater sage grouse and it's habitat.	Though the greater sage-grouse ARMPA is currently under revision, predicting the outcome of that revision and NEPA process would be speculative and pre-decisional. Therefore, the BLM is using the current management guidance regarding sage-grouse. In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a).

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			As described throughout the EIS and as required in BLM (2015a), the project was designed to avoid placing infrastructure within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors). According to the greater sage-grouse ARMPA (2015a, Idaho) the definitions for an unoccupied status are as follows: An unoccupied lek is one that has not been active for five consecutive years. To be designated unoccupied, a lek must be inactive (see above criteria) for five consecutive breeding seasons. The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. The project is proposed in General HMA, which has low breeding density of male sage-grouse. Even though all siting corridors are in a mapped General HMA, sagebrush cover is limited to a few portions of the project area. The presence of suitable habitat indicates that sage-grouse use is likely limited to the eastern and northern portions of the siting corridors (see Figure 3.3-7; Table 3.3-22). The area that contains sagebrush has low cover and to the south and west the project is adjacent to croplands. The project is in an area heavily impacted by existing disturbance.
3150-3	Cameron Stauffer	Secondly, sage grouse populations. As previously stated, the EIS has stated there will be adverse impacts on sage grouse during construction and during operation. There are at least 8 Lek sites that are not confirmed throughout the construction corridors as well as 4 others that are confirmed. When it comes to sage grouse populations, the status quo of management is not working. The EIS states there have been declining in Lek sites since 2011. Additionally, according to IDFG, there has been 6 years of population decline. This has been occurring with ZERO percent "green energy" projects on BLM lands in Idaho. The Biden administration has stated there will be a new sage grouse management plan scheduled for 2023(previously scheduled for 2022). According to E&E news, "the bureau, which has reviewed more than 300 peer-reviewed studies that have been published since 2015, is considering major changes, including possibly redesignating some core sage grouse territory into 'areas of critical environmental concern,' which would add new restrictions on everything from energy development to recreational activities across potentially hundreds of thousands of acres."	Though the greater sage-grouse ARMPA is currently under revision, predicting the outcome of that revision and NEPA process would be speculative and pre-decisional. Therefore, the BLM is using the current management guidance regarding sage-grouse. In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a).
3990-2	Diana Nielson	I am not in Favor of the Lava Ridge Wind Project App4-3. Mitigation Required by BLM Policy Measure Measure Description Number 1. No repeated or sustained behavioral disturbance (e.g., visual, noise over 10 dbA at lek, etc.) to lekking greater sage-grouse from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season. 2. Avoid mechanized anthropogenic disturbance, in greater sage-grouse nesting habitat during the nesting season. Note: Figure 3.3-7 in Section 3.3.5 (Greater Sage- Grouse) depicts spring seasonal use areas, which includes nesting habitat. Spring is defined as March 1– June 30.* 3. Avoid mechanized anthropogenic disturbance during the winter (December 1 – February 29), in greater sage- grouse wintering areas. Note: Figure 3.3-7 in Section 3.3.5 (Greater Sage- Grouse) depicts winter seasonal use areas. The BLM may grant an exception for activities during the winter in patches of winter seasonal use areas only if MVE demonstrates that the area is devoid of sagebrush and unlikely to be used by sage-grouse.*	EIS Appendix 4, Table App4-3, describes Mitigation Required by BLM Policy, which includes all the measures mentioned in the comment.

Comment ID	Commenter	Public Comment	Response to Comment
3990-4	Diana Nielson	7. Locate staging areas outside the greater sage-grouse Priority Habitat Management Areas to the extent possible.	Only a portion of the project occurs in sage-grouse habitat, which is General HMAs, and has been sited to avoid Priority HMAs and Important HMAs.
3997-5	Angelee Eames	Sage Grouse have been thriving and will now lose 807 acres of habitat-where do they move? Salmon Falls?	See response to comment 8376-3 (see in Table A-3e, Greater Sage-Grouse).
4562-1	Stephanie Novacek	Greater Sage-Grouse: Study areas (pp 172): The various areas of impact studies such as ground disturbance doesn't seem to include studies on noise from the operation of the turbines themselves. Does the noise impact the Greater Sage-Grouse species? Also, what about shadow flicker, since the species is very adept at noticing movement? (pp 189): During operation, no occupied leks would experience increased noise from the project; six leks of undetermined status would experience increased noise This is the only mention of operation noise. This seems very shallow and underrepresented. The long range, low frequency noise from turbine operation should be studied in depth for its impact on the GSG. Wildlife is extremely sensitive to motion and sounds, especially when resting and feeding on the surface.	The impacts of noise on sage-grouse during both construction and operation are analyzed in detail in EIS Section 3.3.4.2.2 (Alternative B [Proposed Action]) Issue 2. The greater sage-grouse ARMPA (BLM 2015a) requires that MVE avoid repeated or sustained behavioral disturbance (visual disturbances, noise that is 10 dBA greater than baseline levels at lek, etc.) of lekking birds from 6:00 p.m. to 9:00 a.m. within 2 miles of leks during the lekking season (BLM-required mitigation measure A). The EIS does not analyze in detail the impacts of shadow flicker on sage-grouse, but BLM requires that no turbines be placed within 3.1 miles of leks. As described in EIS Section 3.16.3.2 (Impacts), shadow flicker intensity for receptor-to-turbine distances beyond 6,562 feet (1.24 miles) is very low and generally considered imperceptible.
6863-1	Mike Miller	Would like to comment on the negative impacts to Sage Grouse associated with the wind project. According to Idaho Fish and Game , the highest ranking threat to sage grouse includes (1) invasive species, (2) infrastructures as related to energy development, (3) wildfires. The panel also predicted that the range of the greater sage grouse would contract and fragment due to any habitat modification or loss (1). On the summary sheet ES-XVI of the EIS statement Alternative B , C ,D. and E , all have impacts loss or disturbance of habitat. With the Sage Grouse were close to being placed on the endangered species , but only because of conservation measures between multiple states and organizations , this has not been done yet.	See response to comment 8376-3 (see in Table A-3e, Greater Sage-Grouse).
8372-2	Douglas Miller	As the draft EIS notes, sage grouse populations are in steep decline. The decline has been so dramatic (98% from historic numbers; see https://tinyurl.com/2h34dcy5 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftinyurl.com%2F2h34dcy5&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cdf8d0aca05b8403e6fad08db2a343671%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638150175964057121%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Vuzyqi5Yl%2BGShCrwsq2iv0DwUqpxug0B5ZSe3OvEm5E%3D&reserved=0>) that the species has been proposed for listing as endangered multiple times. We know from a great body of independent, peer-reviewed scientific research that energy development is a significant contributor to the precipitous and accelerating decline of sage grouse. Chief among these detrimental and deleterious effects on sage grouse is nest and brood failure linked to the presence of wind turbines (e.g., LeBeau et al., 2014. Short-term impacts of wind energy development on greater sage-grouse fitness. Journal of Wildlife Management 78:522–530.) The presence of wind turbines decreases chick survival for grouse nesting in grasslands and sage steppe habitats by a whopping 50% (see Proett et al, 2022, Columbian sharp-tailed grouse brood success and chick survival in a wind-energy landscape. Journal of Wildlife Management 86:e22287. https://doi.org/10.1002/jwmg.22287 <https://doi.org/10.1002/jwmg.22287> .) Additionally, quantitative modeling shows that habitat disturbance from energy infrastructure decreases sage grouse brood survival by an eye-watering 61% (see Kirol et al, 2020. Greater Sage-Grouse Response to the Physical Footprint of Energy Development. The Journal of Wildlife Management 84:989–1001.) Sage grouse fatalities are magnified by collisions with fences, especially in flat to gently rolling terrain (see Stevens et al, 2012. Multi-Scale Assessment of Greater Sage-Grouse Fence Collision as a Function of Site and Broad Scale Factors. The Journal of Wildlife Management 76:1370–1380;) The hundreds of miles of new fencing required by each of the build alternatives will exacerbate the already imperious state of sage grouse in the project area. Power transmission lines like those required by each of the build alternatives will have a negative effect on greater sage grouse habitat selection and survival (see LeBeau et al., 2019.Greater Sage-Grouse Habitat Function Relative to 230-kV Transmission Lines. The Journal of Wildlife Management 83:1773–1786.) The science is clear: all of the build alternatives will destroy vital sage grouse habitat and cause sage grouse to become functionally extinct in the project area. Therefore, each of the build alternatives must be rejected. Further, all of the building alternatives will obviate the potential for sage grouse habitat restoration and concomitant sage grouse population revitalization in the project area. Each of the build alternatives will destroy hundreds of acres sage grouse habitat and is therefore clearly incompatible with the BLM's own sage grouse objectives (see https://www.blm.gov/programs/fish-and-wildlife/sage-grouse <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.blm.gov%2Fprograms%2Ffish-and-wildlife%2Fsage-grouse&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cdf8d0aca05b8403e6fad08db2a343671%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638150175964057121%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=78nsZHnATH6fVxb%2BpNtpK%2BYVuJ%2BlOwI2zpnPAUF8Oyw%3D&reserved=0>); namely: * "Safeguarding the most important habitat is essential to the long-term health of sage-grouse populations" * "the BLM continues to invest in treatments for sage-grouse habitat, to restore critical areas and make remaining habitat more resilient to various stressors and threats" (emphasis added) Permitting the Lava Ridge industrial wind factory is in direct conflict to sage grouse habitat restoration and making the remaining sage grouse habitat more resilient! Moreover, the draft EIS says nothing about how the status of the 8 sage grouse leks shown as "unknown" in Figure 3.3-7 will be determined, and if not found to be occupied, how these leks will be restored to	EIS Section 3.3.4.2 (Impacts) summarizes literature regarding impacts on sage-grouse from energy development, including the effects of turbines and transmission lines on nest, brood and hen survival. These studies were used in the analysis to calculate impacts to sage-grouse and their habitat for all alternatives. The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. General HMAs have more flexibility in land-use activities and energy development is allowed as long as appropriate measures are taken to avoid and minimize impacts. As described in EIS Section 3.3.4.1.2 (Sage-Grouse Population and Distribution), the primary threat to sage-grouse is habitat loss. Thus, impacts are quantified as number of acres affected, and compensatory mitigation debits are determined based on number of acres lost and weighted by the quality of the habitat in which it was lost (e.g., Priority HMA). This section also describes the sage-grouse population trends both locally and regionally. EIS Section 3.3.4.1.3 (Sage-Grouse Management Requirements) shows the required buffers where project activity would be restricted to protect leks in all HMAs. Applicable mitigation measures are described in the GRSG Mitigation Plan (Appendix U in MVE [2023]). Additionally, according to BLM (2015), "Designate and manage GHMA as open for wind and solar testing . . . subject to required design features and buffers." As stated in the GRSG Mitigation Plan, the construction of fences will be restricted to the minimum number and amount needed and sage-grouse safe fences would be required. Also temporary (e.g., drop down fencing) will be used where feasible and appropriate. In coordination with IDFG, seven of the eight previously undetermined leks identified in the draft EIS are now unoccupied and, therefore, do not warrant further consideration for BLM management. This conclusion is supported by additional lek count data from 2022 and 2023 and the following data: It has been approximately 70 years since sage-grouse were observed displaying in leks 2J010, 2J011, 2J012, 2J013, 2J014, 2J017, and 2J021. These same leks have had three to six repeated counts of zero since 2000; leks 2J012, 2J013, 2J014 also had a count of zero in 1972. In addition, these seven leks occur in a fragmented landscape with little remaining sagebrush cover, i.e., 9% to 19% sagebrush cover within a 3.1-mile (or 5-km) radius of these leks. Landscape-scale sagebrush cover is important for lek persistence. Occupied leks typically have more than 40% sagebrush cover within a 3.1-mile radius (Knick et al. 2013). The area around these seven leks is also dominated by high annual grass cover within 3.1-mile (or 5-km) radius around the leks, with 40-60% of the area having 20% or more annual grass cover. Because these seven leks have limited sagebrush across the landscape, have high annual grass cover, and are within a landscape further fragmented by agriculture and other land uses, and the leks have had numerous counts of zero over the past 20 plus years, BLM's independent determination of these seven leks is that they are unoccupied. This is also supported by IDFG definitions of five these leks as historical, i.e., no lekking activity in the last 20 years, and two leks (2J011, 2J017) no longer meeting IDFG's definition of a lek, i.e. the lek never had two counts of two or more males within a 10-year period. In summary, none of the previously undetermined leks are active/occupied and thus are not managed under BLM (2015a). One of the eight previously undetermined leks identified in the draft EIS (4L008) had four counts of zero between 2014 and 2022 and it has been over 40 years since it was occupied. However, lek 4L008 is within three and five miles of two occupied leks, 4L159 and 4L152, respectively, both with up to 20 birds, and the kernel density, similar to breeding bird density, is medium to high in this area, partly due to several occupied leks to the north and northeast. Habitat characteristics around lek 4L008 are similar to those around leks 4L152 and 4L159. All three of these leks have low landscape sagebrush cover (< 15%) and high annual grass cover (>40%) due to fires but are within 2 to 3 miles of larger contiguous patches of sagebrush cover. Furthermore, there are

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		vitality. Because the draft EIS does not address the impact on the potential for improving and upgrading sage grouse habitat in the project area (making the draft EIS incomplete,) and without a revised draft EIS that does address this critical element, only Alternative A "No Build" can be considered acceptable. The draft EIS states that mitigation measures will be required to provide a "net conservation gain" (Section 3.3.4.4). But the "net conservation gain" described is only characterized in terms of acres. This approach tells us nothing about the loss of viable lek sites and actual sage grouse population decrease that will result from each of the build alternatives. Again, the draft EIS is incomplete in this regard, and so Alternative A must be recommended.	telemetry locations around leks 4L152 and 4L159 and to the north of 4L008. Due to the counts and recent change in lek definitions, IDFG no longer considers 4L008 a lek. However, BLM's independent determination is to consider lek 4L008 as occupied. Due to the proximity and similar characteristics of occupied leks 4L152 and 4L159, kernel density or breeding bird density, and telemetry locations in the area, there is insufficient information for BLM to consider lek 4L008 as unoccupied under BLM (2015a). Therefore, BLM would err on the side of caution for sage-grouse conservation and treat lek 4L008 as occupied. The BLM has added avoidance and minimization measures in "Alternative B (Proposed Action)", "Alternative B with Additional Measures": Prior to project construction, MVE's compliance manager would consult with IDFG for technical assistance and conduct lek surveys on previously un-surveyed areas identified by MVE as unsuitable habitat (WEST 2021) within 3.1 miles of the siting corridors. These areas would be surveyed by the compliance manager to search for leks that have not yet been identified (see Table App4-4). Required design features (RDFs) (see Table App4-3) and additional compensatory mitigation will be required if new occupied leks are found, in accordance with BLM (2015a).
8372-3	Douglas Miller	And, importantly, sage grouse are a foundational element of the cultural fabric in Idaho. Sage grouse are one of the few truly native Idaho keystone species. Sage grouse are an icon of the west (BLM National Greater Sage-Grouse Planning Strategy: https://tinyurl.com/2st56rym <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftinyurl.com%2F2st56rym&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cdf8d0aca05b8403e6fad08db2a343671%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638150175964057121%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=2G2gVbWin%2BOgYdOvg%2FCxUUiXqzA74HFsbZitwmPXg%2F8%3D&reserved=0>) All of the build alternatives are an order to extirpate sage grouse and a contemptuous malfeasance to destroy Idaho's priceless heritage. The draft EIS says nothing about the psychological harm and trauma that demise of sage grouse caused by each of the build alternatives will inflict on Idahoans whose most treasured memories and identities are rooted in sage grouse.	The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. General HMAs have more flexibility in land-use activities and energy development is allowed as long as appropriate measures are taken to avoid and minimize impacts. Numerous mitigation measures would be required to avoid, minimize, and compensate for impacts to sage-grouse. The BLM would require compensatory mitigation, as described in EIS Section 3.3.4.4 (Compensatory Mitigation), for any action alternative and would require compensatory mitigation to result in a net conservation gain.
8376-3	Rachel Espil	What of the effects upon the already sensitive species of sage-grouse? This habitat is already in need of protection and will be further compromised by this project.	As described throughout the EIS and as required in BLM (2015a), the project was designed to avoid placing infrastructure within 3.1 miles of known, active leks (there are 3 within 6 miles of the siting corridors). The BLM categorizes sage-grouse habitat into three categories (or habitat management areas or HMAs): Priority HMAs, Important HMAs, and General HMAs. Of these, Priority has the highest value, Important has moderate to high value, and General has a lower value. The project is proposed in General HMA, which has low breeding density of male sage-grouse. Only a portion of the project occurs in sage-grouse habitat. Even with the implementation of applicant-committed measures and other mitigation described in the GRSG Mitigation Plan (Appendix U in MVE [2023]), impacts to sage-grouse would remain. Compensatory mitigation would be required, and more details are in the GRSG Mitigation Plan. MVE has a set of options to provide compensatory mitigation for unavoidable impacts to sage-grouse habitat on BLM public lands, which are described in the Mitigation Framework for Greater Sage-grouse section in EIS Appendix 4.
9275-3	AJ Whitecotton	Sage Grouse habitat from your own files that I have read you are trying to build windmills, support roads, etc., right on top of sage grouse designated lands and yet some of the science says that is the worst thing you can do, remove ground cover etc., which now protects the birds from predator's. So you have done everything possible to protect them from grazing, etc., and yet now they are considered secondary? https://eplanning.blm.gov/public_projects/103344/200243182/20029799/250035998/Idaho_GRSG_FSEIS_2020%20COMPILED_508.pdf <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Feplanning.blm.gov%2Fpublic_projects%2F103344%2F200243182%2F20029799%2F250035998%2FIdaho_GRSG_FSEIS_2020%2520COMPILED_508.pdf&data=05%7C01%7Cblm_id_lavaridge%40blm.gov%7C9be8350ae5c34b0940fd08db39c43611%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638167287116841458%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=g1vPb4B39q2X22bLGkg96BwdKjmw%2FAgVG%2FNaNJvYZXs%3D&reserved=0>	See response to comment 8376-3 (see in Table A-3e, Greater Sage-Grouse).

Climate and Greenhouse Gas Emissions

Table A-3f. Climate and Greenhouse Gas Emissions

Comment ID	Commenter	Public Comment	Response to Comment
1042-10	WildLands Defense	This project is NOT in the public interest, and in no way, shape, or form can it be considered "green". The DEIS fails to accurately estimate the carbon greenhouse gas and combined energy and resource use footprint of the facility, and also the short life-span of turbine components. Mining for extraction of all elements used in manufacturing all parts of the turbines, lines, transformers, etc.; energy use in hauling the turbines, manufacturing them, etc.; energy use in replacing them after 1 or 2 decades - all must be fully assessed. Energy loss in transmission to Las Vegas or California must be assessed. There must also be an honest analysis of any "need" for this power, and where it will be used, must be undertaken	See EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) for estimates of the direct and indirect greenhouse emissions. In addition, EIS Appendix 4 includes a list of the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment. Analysis of the origin of raw materials for the project or the ultimate destination for the power generated by the project are beyond the scope of analysis for this EIS.

Comment ID	Commenter	Public Comment	Response to Comment
11204-22	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The 2021 Comments state that the Permittees were "informed that wind farms reduce precipitation and raise ground temperatures in the immediate area of the project" and asked if this information would be true with respect to impacts from the proposed Project to the micro-environment within the Star Lake Allotment as this would potentially alter forage growth on the Allotment. 2021 Comments, pg.18. The DEIS did not address these concerns and questions at all. The DEIS and its associated Appendices use the word "precipitation" 14 times but never mention whether wind farm infrastructure has any impact on precipitation levels, timing, or patterns. The DEIS and its associated Appendices never use the words/phrases "ground temperature", "micro-environment", "micro environment", "micro-climate", or "micro climate."	The commenter is referred to AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) regarding how vegetation and plant reproductive success could be affected by changes to ground-level temperatures and humidity levels from turbine operation. The presence of turbines could impact vegetation phenology because of changes in ground-level temperatures and humidity levels due to air mixing and turbulence from the turbines (Lee and Keith 2018; Roy et al. 2004). Lee, M.M., and D.W. Keith. 2018. Climatic impacts of wind power. Joule 2:2618–2632. Available at: https://doi.org/10.1016/j.joule.2018.09.009. Accessed July 10, 2023. Roy, S.B., S.W. Pacala, and R.L. Walko. 2004. Can large wind farms affect local meteorology. Jou*rnal of Geophysical Research* 109. doi:10.1029/2004JD004763.
11534-13	Matt Arnold, William Eubanks	The Full Extent of the Project's Greenhouse Gas Emissions Section 3.4 of the DEIS endeavors to quantify the greenhouse gas ("GHG") emissions that are expected to "be emitted from construction and decommissioning of the project," and how those "emissions contribute to climate change." DEIS at 3-126. Unsurprisingly, it concludes that regardless of any such emissions, the Project "would incrementally contribute toward achievement of national climate change goals" by generating energy from a renewable source, which "would result in significantly fewer emissions than if the same amount of energy were generated by fossil fuels." Id. at 3-140. The DEIS's evaluation, however, entirely omits the GHG emissions emitted by the manufacture and transport of the Project's critical infrastructure. See id. at 3-364 ("[S]pecific turbine component delivery routes are unknown (and would not be determined until closer to the start of construction) and would be determined by the turbine manufacturer . . ."). This information must be included to understand the full extent of the Project's GHG emissions, as an increasing number of turbines are manufactured in and imported from countries with far less restrictive climate controls. China's Increasingly Cheap Wind Turbines Could Open New Markets, S&P GLOBAL, https://bit.ly/3mqq7o1 (Sept. 26, 2022).11 Understanding where and by whom these turbines will be manufactured and transported also serves to inform the public and decisionmakers whether this Project is contributing to the Biden Administration's policy of encouraging domestic clean-energy jobs. Fact Sheet: Biden-Harris Administration Races to Deploy Clean Energy that Creates Jobs and Lowers Costs, WHITE HOUSE (Jan. 12, 2022), https://bit.ly/3UtZj2F. By omitting this information from the DEIS, BLM has not only failed to take a "hard look" at the Project's actual GHG effects, it has also arbitrarily skewed its analysis in favor of Project authorization.	EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) summarizes the direct and indirect greenhouse emissions, as does EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions). These emission estimates represent the project's direct and reasonably foreseeable indirect GHG emissions. The place of manufacture and transport of the wind turbine components is speculative and unknown at this time. The BLM is not able to analyze impacts that are beyond the scope of the project or make assumptions based on where and how the components will be manufactured and transported.
11535-118	Steven Andersen	The EIS fails to adequately consider the impacts on the environment versus productivity of the project. Harvard University studies quantified the generating capacity of 411 wind farms (using U.S. datasets) and concluded the average power density (the rate of energy generation divided by the encompassing area of the wind plant) was up to 100 times lower than previous estimates, including previous estimates from the Department of Energy and Intergovernmental Panel on Climate Change.346 Additionally, the study concluded that wind power causes climatic impacts such as warmer temperatures, which increase with the height of the turbines. 347 This intense study by Harvard University demonstrates negative climate impacts posed by wind farms. The warming is the effect of wind turbines actively mixing the atmosphere near the ground and aloft while simultaneously extracting from the atmosphere's motion.348 This study supports more than ten other studies that observed warming near operation US wind farms and is supported by satellite-based observational studies that found temperature increases.349 Importantly, the studies also note that the warming effect in the continental U.S. caused by wind turbines is actually larger than the effect of reduced emissions for the first century of its operation. This is because the warming effect is predominantly local to the wind farm, while greenhouse gas concentrations must be reduced globally before the benefits are realized.350 The DEIS grossly underestimates the construction period and the associated greenhouse gas emissions.	AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) addresses potential changes to ground-level temperatures from turbine operation. The referenced study (Lee and Keith 2018) was reviewed and added to AIB-44. Lee, M.M., and D.W. Keith. 2018. Climatic impacts of wind power. Joule 2:2618–2632. Available at: https://doi.org/10.1016/j.joule.2018.09.009. Accessed July 10, 2023.
11833-5	Bob Hassoldt	My final concern is that there is no financial analysis for this project. There is no cost-benefit analysis. How much will the climate be changed by this project? What reduction in the amount of CO2 will occur versus the same energy produced by a natural gas plant? If there is a CO2 reduction, how much will that reduction cool the planet and how much of a monetary benefit will that provide to the American citizenry?	Section 3.4.2.2.2 quantifies the estimated avoided emissions and the social cost of carbon for Alternative B. There is no method to quantify how anticipated CO_2 reductions from one project would impact global temperatures. Furthermore, due to the global nature of climate change and the scale of global CO_2 emissions, a single project will not have a discernable impact on temperature change.
11849-6	Charles Brockway	Modern electrical equipment makes use of sulfur hexafluoride for insulation and arc quenching. This compound is extremely stable with an estimated atmospheric life of 3,200 years. It is "the most potent greenhouse gas known to date," according to the EPA. The EIS fails to analyze the effect of its use and potential release in conjunction with the proposed project.	See EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) for the greenhouse gas emissions due to SF6 leaks.
11962-8	Cassie Christensen, Tyler Christensen	According to the report generated RRC Companies (Volume 2a-J-b-1) it is stated that there will be an estimate of 810,930 trips during the construction. In this assumption, it also states that it is believed that a number of workers will carpool to the job site, so the estimate could easily be 1.5% higher than stated, which brings it to 1,216,395 trips. Has a conversion been done on how much fuel will be burned in order to drive that many trips? Besides the amount of fossil fuels that will be burned just in the trips made (doesn't include the building, creation or any other type of CO2 that will be created in the construction of this project) the calculated trips don't include the construction of new public roadways in the area that will need replaced before and after construction. I assume that RRC has not physically seen the conditions of the roads that lead to the proposed site are in.	EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) provide estimates of the direct and indirect greenhouse emissions. In addition, EIS Appendix (Mitigation) lists the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment (measures 39 and 118). Construction and maintenance of public roadways is not within the scope of this project nor within the authority of the BLM or the project operator. Project-specific road construction and the associated emissions, including from vehicle traffic, have been included in the referenced sections.
11978-26	Magic Valley Energy, LLC	Section 3.4.2.2.2 – Social Cost of Carbon (Alternative B) 22. MVE Comment: In Table 3.4-5, the DEIS lists the estimated Social Cost of GHG (SC-GHG) associated with Alternative B; however, SC-GHG values are not provided for the other alternatives under review. MVE requests that BLM provide estimates of SC-GHG for the	As discussed in EIS Sections 3.4.1.2.3 (Alternative C [Reduced Western Corridors]) through 3.4.1.2.5 (Alternative E [Reduced Southern Corridors]), the construction emissions of Alternatives C, D, and E are likely to be the same or less than the construction emissions generated by Alternative B. Similarly, the operations

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		other alternatives, which is necessary to enable readers to calculate the net climate-related benefits of each alternative by subtracting the SC-GHG values for each alternative from the very large climate and health benefit values listed in Table 3.4-6.	emissions for Alternatives C, D, and E, discussed in EIS Sections 3.4.2.2.3 (Alternative C [Reduced Western Corridors]) through 3.4.2.2.5 (Alternative E [Reduced Southern Corridors]) are likely to be the same or less than the O&M emissions generated by Alternative B. Since SC-GHG values are based on these emissions, the SC-GHG values for Alternatives C, D, and E would likely be the same or less than the SC-GHG values calculated for Alternative B. Quantifying the estimated values would not contribute further to the analysis.
11978-27	Magic Valley Energy, LLC	Section 3.4.2.2.6 – Operational GHG Impacts: Cumulative 23. The DEIS states: "Future trends and actions would also increase GHG emissions through operation of new energy generation facilities to meet future power demands. Because the future planned actions are also renewable energy projects, their operation emissions would be fewer than those generated by fossil fuels (see section below for more details). The project would incrementally contribute toward achievement of national climate change goals. Without deep reductions in GHG emissions globally, a warming of 2°C is predicted to be exceeded during the twenty-first century, which is projected to increase climate change risk and have adverse consequences for human and ecological systems (IPCC 2021). The impacts to climate change from project operation would be minor. As described below, the project would generate energy from a renewable resource and would result in significantly fewer emissions than if the same amount of energy were generated by fossil fuels." a. MVE Comment: The recent CEQ guidance, National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (the "2023 CEQ Guidance") states the following: "The agency generally should present annual GHG emissions increases or reductions, as well as net GHG emissions over the projected lifetime of the action, consistent with existing best practices. Agencies should be guided by a rule of reason and the concept of proportionality in undertaking this analysis, particularly for proposed actions with net beneficial climate effects, as described below."15 Consistent with the 2023 CEW Guidance, the cumulative impacts analysis should include additional analysis including a high-level assessment of the GHG benefits associated with the other proposed renewable energy projects in the analysis area.	Discussion of other renewable projects added to Cumulative Impacts section (3.4.2.2.7).
11978-28	Magic Valley Energy, LLC	Section 3.4.2.2.1 – Operational GHG Emissions Impacts: Alternative A (No Action) 24. MVE Comment: The 2023 CEQ Guidance specifies that "…development of a new wind energy project may result in short-term construction GHG emissions but overall long-term GHG benefits. Agencies should describe both short- and long-term effects in comparison to the no action alternative in NEPA reviews and clearly explain the net effect of their actions even if precision regarding the timing of short- and long-term effects is not possible." Thus, per the 2023 CEQ Guidance, Section 3.4.1.2.1 of the FEIS should be revised to compare the avoided GHG emissions estimated for the various alternatives versus the lack of avoided GHG emissions associated with the no action alternative.	EIS Section 3.4.2.2.1 (Alternative A [No Action]) has been revised to include a discussion of the lack of avoided GHG emissions associated with the No Action alternative.
11978-121	Magic Valley Energy, LLC	23. Section 3.04.1.2.2 Climate and Greenhouse Gases - Alternative B (Proposed Action) Table 3.4-2; Table 3.4-3 Table 3.4-2 has a footnote stating that calculations are only provided for Alternative B. An analysis for Alternatives C, D, and E would be beneficial to include in this table and related tables throughout this section. Contrary to the footnote, it would seem that the values of estimated annual project construction greenhouse gas emissions would likely change based on different sizes of the Project area, as vehicles would not need to travel as far. One would assume that GHG emissions would be close to the proportionality of the total area of surface disturbance for any given alternative.	As discussed in EIS Sections 3.4.1.2.3 (Alternative C [Reduced Western Corridors]) through 3.4.1.2.5 (Alternative E [Reduced Southern Corridors]), the construction emissions of Alternatives C, D, and E are likely to be the same or less than the construction emissions generated by Alternative B. Quantifying the estimated construction emissions for Alternatives C, D, and E would not contribute further to the analysis.
11991-8	Julie Abo	I would like to know what the "existing fossil fuel sources" are that would be replaced. This energy will not be used locally. How does this calculation work?	The estimated avoided emissions by generating electricity via the project instead of traditional fossil fuel–powered plants were calculated using the EPA's AVERT Excel Edition, Version 3.2 for the Northwest region based on EPA's 2019 regional data file. AVERT uses hourly "prepackaged" data from EPA's Air Markets Program Data (AMPD) and National Emissions Inventory to perform statistical analysis on actual behavior of past generation, given various regional demand levels.
11994-2	Danielle Gunn	The current state of this unaltered, minimally fragmented open space contained in these allotments also plays a significant role in carbon sequestration needed to manage climate change.	As described in EIS Section 3.15.1.1 (Native Upland Vegetation Communities, Affected Environment), the analysis area is composed mostly of sagebrush steppe and grassland vegetation; forests and woodlands that sequester more carbon, are not present. Impacts to native upland vegetation are summarized in EIS Table 3.15-3 (Summary of Impacts to Native Upland Vegetation Communities). EIS Appendix 4, Mitigation, lists mitigation measures that would be implemented to minimize or avoid impacts to native vegetation/loss of carbon sequestration and wildlife habitat.
11994-5	Danielle Gunn	Secondly, the DEIS needs to address the economics of wind power and how this power source compares to hydrologic and fossil fuel generated power.	Hydrologic and fossil fuel generated power are not alternatives analyzed in detail in the EIS and therefore the economics of those types of energy are not analyzed. Furthermore, hydrologic and fossil-fuel generated power are not evaluated in this EIS as part of the Proposed Action, nor does NEPA require analysis of alternatives that do not meet the purpose and need of the Proposed Action.
12398-16	US Environmental Protection Agency	Climate Change, Resilience and Adaptation Regarding impacts of climate change, EPA recommends the FEIS: • Broaden the discussion in section 3.4.1.1.1 to include existing and reasonably foreseeable environmental trends related to a changing climate of the analysis area. • Discuss reasonably foreseeable effects that a currently changing climate will have on the proposed project and the project area, including its infrastructure. This could help inform the development of measures to improve the climate resilience of the proposed project. If projected climate-related changes could notably stress the affected environment or exacerbate the environmental impacts of the project, these impacts should also be considered as part of the NEPA analysis. For example, adaptation strategies could include an extreme weather event analysis to minimize or prevent a disruption of power or loss of energy to consumers from natural disaster events. An increase in the magnitude or frequency of extreme events can severely challenge utility systems that are not designed to withstand intense events. Extreme event	EIS Section 3.4.1.1.1 (Existing and Future Trends and Actions) describes existing and reasonably foreseeable environmental trends related to a changing climate. Text was added to EIS Section 3.4.1.2.2 (Alternative B [Proposed Action]) regarding effects of a changing climate on the project. The Proposed Action is not anticipated to exacerbate climate change impacts in the area.

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		analyses or modeling can help develop a better understanding of the risks and consequences associated with these types of events.	
12398-17	US Environmental Protection Agency	Indicate expected sulfur hexafluoride (SF6) emissions usually associated with gas-insulated switchgears on the WTGs and measures to be taken to minimize these emissions. One action that could be taken is for BLM to require adoption of SF6-free switchgears (“clean-air”) or other equipment. If SF6-free switchgears are determined to be technically infeasible, or are unavailable, the Applicant could also limit SF6 leaks to the extent practicable or required by state or federal regulations. SF6 is the most potent known greenhouse gas, with the potential to trap infrared radiation approximately 23,000 times more effectively than carbon dioxide. SF6 is also a very stable chemical, with an atmospheric lifetime of 3,200 years. Thus, a relatively small amount of SF6 can have a significant impact on global climate change.	See EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]) for the sulfur hexafluoride emissions associated with circuit breakers and switchgears quantified as its CO2 equivalent.
12398-18	US Environmental Protection Agency	EPA recommends that the FEIS include information from the March 2023 Synthesis Report of the IPCC Sixth Assessment Report16 which states that the amount of current global climate adaptation measures, like the development of renewable energy infrastructure, are inadequate to prevent widespread adverse impacts and related losses and damages to nature and people. The Synthesis Report states with high confidence that for any given future warming level, many climate-related risks are higher than assessed in Fifth Assessment Report, and projected long-term impacts are up to multiple times higher than currently observed. The Synthesis Report states with high confidence that energy generation diversification (e.g., via wind) can increase energy reliability and reduce vulnerabilities to climate change.	This information has been added to EIS Section 3.4.1.1.1 (Existing and Future Trends and Actions).
12398-19	US Environmental Protection Agency	Highlight the climate change benefits/avoided greenhouse gas emissions. In our Scoping letter, EPA recommended that the DEIS include analysis of the existing and reasonably foreseeable environmental trends related to a changing climate and highlight the climate change benefits and avoided greenhouse gas emissions associated with this proposed project. EPA notes the DEIS explains the potential estimated avoided emissions for each action Alternative. Using EPA’s Greenhouse Gas Emissions Equivalency Calculator, we estimate that the minimum annual avoided emissions from the action alternatives is equivalent to removing about 500,000 gasoline-powered passenger vehicles driven for one year from the transportation system. These avoided emissions represent significant benefit to the environment. Concerning climate resilience and adaptation, EPA encourages the FEIS describe available mechanisms in the BLM licensing processes and other authorizations to cover the costs of safety measures and project operations and decommissioning including specific adaptive management plans to contend with changing climatic conditions that may affect this project operations.	Additional discussion regarding the GHG equivalencies for the potentially avoided emissions has been added to EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]).
12469-2	Mike Telford	It is my understanding that the NEPA laws and regulations and other environment law’s purpose is to protect the environment. I do not find in the DEIS any detailed analyze of the carbon foot print of all inputs, construction, transportation, operation, and decommissioning and disposal, that would be created by Lava Ridge. This carbon foot print is very different than emission standards and analysis. Surly we must consider everything it takes. The raw materials mined or created down to the last gallon of fuel used. With geopolitical upheaval in the world, there must be consideration not only of carbon but where components are coming from, their standards, and who benefits. Wind power is proving to be relatively inefficient, and expensive. No one is opposed to “Green Energy” but we can not create more adverse impacts to the environment with more environmental damage than what it is suppose to replace. There is no way to assess the impact without a complete carbon foot print study of Lava Ridge. It makes no sense to destroy the environment to save it.	EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) estimate the direct and indirect greenhouse emissions. In addition, EIS Appendix 4 (Mitigation) lists the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment. EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]) quantifies the estimated avoided emissions and the social cost of carbon for Alternative B. NEPA does not require an analysis of impacts beyond the “Affected Environment” of the project. It is also speculative and beyond the scope of the Proposed Action to make assumptions of where raw materials may be derived from or where the components for the turbines would originate.
12969-2	Karen Brockway	In addition, on June 24, 2022, I sent you a letter explaining the impact of increased sulfur hexafluoride (SF6) that the switchgears for the turbines release. SF6 is 23,500 times more warming that carbon dioxide (CO2), and remains in the atmosphere for at least 3200 years. Because the turbines for the LS Power project have not been specified, neither LS Power nor BLM have addressed this major flaw of wind turbines, and the draft EIS statement completely neglected to investigate this valid environmental concern. Please refer to my previous letter with attached documentation for further information on the long environmental impact of SF6•	EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) lists the greenhouse gas emissions due to SF6 leaks. In addition, EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]) quantifies the estimated avoided emissions and the social cost of carbon for Alternative B.
12976-4	James Komadina	2. Plan of Development a. Along with POD Appendix J, Section 3.14 of the following reports describe traffic patterns to/from the construction area: Transportation Assessment for the Lava Ridge Wind Project (Mott MacDonald 2021a), Review of-Trip Generation and Delivery Flow Plan -November 2021 Updates (Mott MacDonald 2021b) and Trip Generation Report for the Lava Ridge Wind Project (RRC 2022). b. POD Section 2.5 describes in general terms, the equipment necessary for construction of the Alternatives. Knowing the number of turbine structures, meteorological towers, power line alignments as well as ancillary facility locations as described in POD Section 1.3, along with industry productivity factors for the various mechanical and earthworks required, it is possible to develop a man-loaded equipment construction schedule from this coarse data. i. COMMENT - The level of accuracy from the Transportation Assessment data is inadequate for estimation of GHG emissions. A detailed man loaded activity schedule specifying the total individual annual equipment hours necessary to complete the project construction, operation and decommissioning is required to develop an estimate of total GHG emissions for the Alternatives under consideration.	Traffic estimates are detailed in MVE (2023) and in the EIS and are sufficient to allow analysis of effects and a reasoned comparison of alternatives. The emissions inventory prepared for the draft EIS estimated equipment emissions based on MVE (2023).
12976-10	James Komadina	4. Benefits/Valuation a. Reviewing the model inputs for Table 3.4-5, these are derived from Interagency Working Group on Social Cost of Greenhouse Gases (IWG). 2021. Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide. Interim Estimates under Executive Order 13990, and are incorporated into the model and compounded annually by 3% for the entire POD 30 year life. Text in 3.4.2.2.1 states "Significant uncertainty in the SC-GHG estimates exist." Further, "It is important to disclose that uncertainty is substantial	EIS Table 3.4-7 (Social Cost of Greenhouse Gases from Alternative B) has been updated to include emissions from the anticipated 2-year decommissioning. SCC estimates are provided for disclosure purposes. The BLM does not rely on a single paper or report to change how analyses are conducted.

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		(IWG 2021)." (Emphasis added). i. There is wide precision in the estimate of SC-GHG, between $7/tCO2 to $125/tCO2, depending upon the confidence interval considered. Millstein, D., R. Wiser, M. Bolinger, and G. Barbose. 2017. "The climate and air-quality benefits of wind and solar power in the United States." Nature Energy, 2: 17134 explains this distribution as: "The range of estimates presented is driven both by the uncertainty in the underlying processes and also by differences in model characteristics; note, our analysis does not represent a full assessment of underlying uncertainties." 1. The accuracy of SC-GHG as set forth is not discussed and remains unquantified. 11. None of the foregoing input variables allow for human adaptation to changing environmental conditions which are described and supported by research contained in the Technological Forecasting & Social Change 156 (2020) paper Welfare in the 2JS' century: Increasing development, reducing inequality, the impact of climate change, and the cost of climate policies by Lomborg. 111. COMMENT-For financial purposes, the internal rate ofreturn ("IRR") is that rate by which investment cash flows must be discounted to the present to equal zero. This IRR represents the degree of risk, along with payback period, that an investor might consider prior to making the investment. Using assumptions from 2d(i) to (iii) above, the pre-tax IRR of Lava Ridge Alternative B is approximately 61%. As the SC-GHG model outputs indicate, compounding any gas emission cost by any factor less than the present value discount rate, leads to a future annual cost lower than the current value. Utilizing discount rates less than 5% provides a false sense of risk and accuracy when public investment analyses warrant a significantly higher discounting. Given the broad uncertainties inherent with the SC GHG estimates, Table 3.4-5 should be deleted from this DEIS document. 1v. COMMENT-For completeness, there is an error in the model as the final year of Decommissioning has been omitted.	
12976-11	James Komadina	b. Text in 3.4.2.2.1 notes that the "EPA's AVERT is not a long-term projection tool and is not intended to analyze avoided emissions for more than 5 years from baseline." The DEIS cites Land-Based Wind Market Report: 2022 Edition, authored by the DOE Office of Energy Efficiency and Renewable Energy, Figure 60, as the marginal health and climate benefits of $46/MWh used in Table 3.4-6 Climate and Health Benefits. i. Going to the DOE Figure 60 reference, Millstein, D., R. Wiser, M. Bolinger, and G. Barbose. 2017. "The climate and air-quality benefits of wind and solar power in the United States." Nature Energy, 2: 17134, the base data ends in 2015, outside of the AVERT guidance 5 year window. 11. The DOE study ends noting, "Both estimates of health and climate benefits are subject to uncertainty. Central estimates of these benefits are presented, though both estimates have a wide range of plausible values. More detail about this uncertainty is available in Millstein et al. (2017) and Fell and Johnson (2021)." (Emphasis added). m. COMMENT - It would appear that the underlying AVERT data is outside of the 5 year efficacy window and that the model outputs need to be updated for this DEIS. 1v. COMMENT - Millstein, D., R. Wiser, M. Bolinger, and G. Barbose. 2017. "The climate and air-quality benefits of wind and solar power in the United States.,, Nature Energy, 2: 17134 discusses that, "EPA states that greater than 90% of the per ton total monetary benefits are due to the reduced mortality rates." For the period 2007 - 2015, the premature mortalities avoided are cited as 3,000 to 12,700. The definition of premature mortalities must be clearly set forth. The control group for premature mortalities must be clearly set forth. The actual premature mortalities avoided must be documented and verified. v. COMMENT - While arithmetically correct, the 30-year estimate in Table 3.4-6 should be omitted as it falls well outside any predictive data available. v1. COMMENT - The net generation capacity utilized for the 6-MW Maximum Generation Case is not supported by the DOE study as these proposed turbines fall outside of industry practice at this time - they will be novel installations without actual production data. Therefore, this data should be omitted from the DEIS.	Table 3.4-8 has been revised and no longer estimates 30 years of avoided emissions. Instead, it presents the annual avoided SC-GHG based on annual avoided emissions estimated by AVERT. All data and discussion that used the DOE's Land-Based Wind Market Report: 2022 Edition have been deleted. The SC-GHG analysis and discussion are now entirely based on the IWG's *Technical Support Document: Social Cost of Carbon, Methane, Nitrous Oxides* and annual avoided emissions as estimated by the EPA's AVERT.
12976-12	James Komadina	c. Scope 1, 2 and 3 Inventory Guidance. Scope 1 emissions are direct greenhouse (GHG) emissions that occur from sources which are controlled or owned by an organization (e.g., emissions associated with fuel combustion in boilers, furnaces, vehicles). Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling. Although Scope 2 emissions physically occur at the facility where they are generated, they are accounted for in an organization's GHG inventory because they are a result of the organization's energy use. Scope 3 emission are all indirect emission, not included in Scope 2, that occur in the value chain of the reporting company, including both upstream and downstream emissions. Scope I and Scope 2 Inventory Guidance I US EPA. Directly applicable Scope 3 emissions, arising from the amount of rolling stock required to construct, operate and decommission the Lava Ridge facility are significant. The EPA notes in this guidance that, "Scope 3 emissions are the result of activities from assets not owned or controlled by the reporting organization, but that the organization indirectly affects in its value chain. Scope 3 emissions include all sources not within an organization's scope 1 and 2 boundary. The scope 3 emissions for one organization are the scope 1 and 2 emissions of another organization. Scope 3 emissions, also referred to as value chain emissions, often represent the majority of an organization's total greenhouse gas (GHG) emissions." i. COMMENT - MVE must account for all emissions generated by the rolling stock during construction, operation and decommissioning stages of the project as well as those associated with the manufacture of all capital elements utilized by this Project on a cradle to grave basis. MVE has not developed and clearly set forth this required data.	Neither NEPA nor CEQ guidance requires the estimation of Scope 3 emissions. Estimation of such emissions is speculative and beyond the scope of this EIS. See Section 3.4.1.2.2 (Alternative B [Proposed Action]) Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) of the EIS for estimates of the direct and indirect greenhouse emissions as well as Section 3.4.2.2.2 Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions). These emission estimates represent the Proposed Action's projected direct and reasonably foreseeable indirect GHG emissions.
12976-13	James Komadina	d. Further, on January 9, 2023, the CEQ issued interim guidance on GHG emission evaluation in NEPA documents for Agencies to immediately implement until such time as the final guidance, currently in public review, is completed. Federal Register:: National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change i. COMMENT- This section of the DEIS must be revised using the new CEQ interim guidance.	Additional discussion regarding the GHG equivalencies for the potentially avoided emissions has been added to Section 3.4.2.2.2 (Alternative B [Proposed Action]).

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12976-14	James Komadina	e. Global warming has been deemed by some as an existential threat to humanity. Ocasio-Cortez: 'World will end in 12 years' if climate change not addressed I The Hill DEIS Section 3.4.1.1 acknowledges that "Water vapor is the most abundant GHG " i. COMMENT- Water emissions arising from activities covered under this DEIS have not been quantified nor have efforts to remove water vapor from the atmosphere have been addressed in this DEIS. The DEIS must describe all efforts being made to eliminate water emissions from occurring from these proposed actions. 11. The thoroughly referenced book Unsettled by Koonan (2021) notes that: 1. "In any event, it is impossible-for both practical and fundamental reasons-to tune the dozens of parameters so that the model matches the far more numerous observed properties of the climate system. Not only does this cast doubt on whether the conclusions of the model can be trusted, it makes it clear that we don't understand features of the climate to anywhere near the level of specificity required given the smallness of human influences." 2. "The uncertainties in modeling of both-climate change and the consequences of future greenhouse gas emission make it impossible today to provide reliable, quantitative statements about relative risks and consequences and benefits of rising greenhouse gases to the earth system as a whole, let alone to specific regions of the planet." 111. COMMENT - The IPCC utilizes over a dozen models in their work. The specific IPCC model which is utilized in this DEIS to justify GHG avoidance costs and benefits must be set forth. The untruncated model inputs utilized must also be set forth. Quantitative proofs of the precision and accuracy of the historic model results must be clearly summarized. The cumulative error of the estimate must be developed and presented.	Water vapor is not a GHG of concern for the Proposed Action and is not estimated in the draft EIS. Watering is necessary for dust suppression on roads and reclamation of disturbed areas. No IPCC model was used for the draft EIS to justify GHG avoidance costs and benefits. Furthermore, IPCC models that are used at global and regional scales are not designed for the project-specific analyses analyzed in the draft EIS. EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) give estimates of the direct and indirect greenhouse emissions. EIS Appendix 4 (Mitigation) lists the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment. EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]) quantifies the estimated avoided emissions and the social cost of carbon for Alternative B. The EIS has been updated to include information from the March 2023 Synthesis Report of the IPCC Sixth Assessment Report (IPCC 2023), which states that the amount of current global climate adaptation measures, like the development of renewable energy infrastructure, are inadequate to prevent widespread adverse impacts and related losses and damages to nature and people. The Synthesis Report states with high confidence that for any given future warming level, many climate-related risks are higher than assessed in Fifth Assessment Report, and projected long-term impacts are up to multiple times higher than currently observed. The Synthesis Report states with high confidence that energy generation diversification (e.g., via wind) can increase energy reliability and reduce vulnerabilities to climate change.
1311-1	David Mollineaux	Second, I heard that the cost to build one turbine with all the materials like concrete, metal and labor exceeds the power recovery over the life of the turbine. Is that true? Do you use up more energy in building the turbine than in the power it can provide? I would like to see a study showing the benefits.	The economic benefits of turbine manufacturing are outside the scope of the EIS analysis.
1697-1	Dean Dimond	Research shows that Wind farms can change the local weather patterns. It is going to be impossible to know the true effect of Lava Ridge as there are not any wind farms this large with this tall of towers. The DEIS fails to show this. What gives L.S power the right to change the weather pattern at my farm. When I have to water more because of it will LS POWER pay for it? Will the BLM be liable? were will I get the water? What will be the affect if other Wind projects are approved? How far will away will Lava Ridge affect the climate? What if Lava Ridge changes the weather pattern so the storms don't reach the mountains that supply our water? What will it do to Yellowstone Park? All of these questions and more SHOULD have been answered in the DEIS. Data from a meteorological field campaign show that such wind farms can significantly affect near-surface air temperatures. These effects result from enhanced vertical mixing due to turbulence generated by wind turbine rotors. https://www.nature.com/articles/s41598-021-02089-2	Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022) and a reduction in crop productivity or yields has not been documented (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017). Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that turbines would have negative economic consequences for the local agricultural economy. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
5920-6	Kelly Varelmann	The environmental impact of these huge windmill projects are not just felt locally but also has a huge worldwide impact. The metals and hazardous materials needed to build wind turbines are mined in China where low environmental standards are the norm. The materials, parts and/or entire windmill blades are then shipped to the US using enormous amounts of fossil fuels. The blades are then trucked to the project sites using, yet again, enormous amounts of fossil fuels. It's my understanding that the industry has no solution for the disposal or recycling of these monsters once they are no longer functioning and at this time are merely being buried in the ground by heavy equipment that ironically uses fossil fuels. Currently the lifespan of a wind turbine is only approximately 20 to 25 years so at the rate they are currently being erected, we could be in for an environmental disaster in the near future, not to mention the current effects on the soil and ground water the decommissioned buried turbines are having right now.	See responses to comments 11873-7 and 11926-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
6017-1	Michael Siegle	My biggest question is the initial carbon footprint of manufacturing and transport and assembly, including any initial environmental and ecological impact. How long will it take to make up for these initial carbon investments?	EIS Table 3.4-6 estimates the annual and 5-year avoided emissions for the operation of the project. While it is true these emissions represent only a piece of the lifecycle GHG emissions of fossil fuel electricity generation, installed wind turbines harnessing the wind for electricity generation is also only a piece of the lifecycle wind power. The BLM has compared the emissions at the point of electricity generation rather than the entire lifecycle, since lifecycle emissions can vary greatly depending on project specifications. Guessing where turbines would be manufactured and their delivery route to the project site would be speculative and beyond the scope of reasonable analysis for this EIS.
7339-1	Matt F	Recent reporting suggests that as wind turbines get larger, they collapse more often. In addition to the danger of the collapses, such events will reduce the estimated power output of the project. This presents a problem because the EIS performs various calculations about the estimated emissions reductions that will result from the project. However, these calculations do not take into account turbine collapses and the subsequent reduction in power production caused by them. If the power output is reduced, then the emissions reduction benefits will also be reduced, thus possibly changing the determination of whether the project will be worth doing from an emissions reduction standpoint.	The EIS cannot speculate what turbines, if any, would have any type of mechanical or structural issues that would take them offline and temporarily reduce the overall capacity of the project. Turbines would be maintained to avoid mechanical or structural issues.

Comment ID	Commenter	Public Comment	Response to Comment
7341-1	Matt F	The EIS states on pp ES-xix that the operations phase will be 34 years. This is unrealistic because the machinery of the turbines degrades over time. This leads to a reduction in power output at a rate of about 1.6% per year, as can be seen in the discussion section of this paper which studied onshore turbines in the United Kingdom in 2013: https://pdf.sciencedirectassets.com/271431/1-s2.0-S0960148113X00138/1-s2.0-S0960148113005727/main.pdf?X-Amz-Security-Token=IQoJb3JpZ2luX2VjEJX%2F%2F%2F%2F%2F%2F%2F%2F%2F%2FwEaCXVzLWVhc3QtMSJHMEUCIHk%2BH%2FvXqkJWbdBxSPQpIeOWDBoNeZ5mm7TYm3h7hR5eAiEA%2BPNdVqQiFPwZ8GSdYaoNtzJQRi3M3wJaTpaAgnLJ4QYqswUITRAFGgwwNTkwMDM1NDY4NjUiDK3X7NuW%2F1wI35a1WCqQBeazecv0SAnRKBxrRGsxMzMae6YIXCwuhtyxshlnop2ggIfKA5aE%2FsQOvbNFcXjGMUrzsYw9uHjUJSPmpxqpP0sLB%2BI3y7TS8x%2FJyJiPFblvhyUJYQ9Bsg3PxRIiCXxhIrBeLfk15a3CvBX2uTExSaOxZLLHIY%2FZLNhdUf8oG3kDvexzceZiHYT029WpHX8gpSCXbNGc4Fp%2BJzwUoC7xSH39cH4IisTUnz4QdIydsaDZVTS8UADeNINoL3C4E6%2BE%2FMIIA2TrWEHyMZGDwRB16q6TpbWNTYtK6HEBlVQ1jC%2BkCBhbH8IFfByZZDASdKdR3xotrWNjDI498%2BeoZ0yAvMFo8cTY4bxXcq30caZ47tx7neScNOfNh9mfcQBDwi4OZj0gTD72PtoHbEW3rvW4aD5TgZIzSyPyqlh%2Ba0ANceZR6TrzCDCec4gwXaXZd7JCB%2FhIhtR3ZXtrYYgSD5yrohFXYNeVQRdgA1BeC%2BiDyqsNAlp%2F2k%2B0Axj6y7orqOHOSYxFnETvYB34aihhFhuoRqiyFx8pvs0ddTX5KTTLxnKkXk5WuQvw8N6c%2B0G92F4BeO2xBuqf66cKQNnZDM8ZNgyOK0TxZTmAxPBm%2BgLcqKDuikeV2nx7T5yY6%2BiFEvJ7c8pp%2B%2Frq2pNdr28HOgPZLN1wuVzem46garwmkzTVdc9k8ps4wmTniBLzKFpTQxnuzx00MwihDElKX0sFkFxoEhLQCksEUVvNJt10BeRQpNTnL7j49hSCsMSXy4Buw4%2FuxPbnvWUhrlHXg3ttYFQKLCGsJRpgB30u2ywpun%2FW8pLz0iGNofGNmGGpKqd%2BVbSpy08azvshO24QogYK4xG6%2BDeyHhHo8%2B4sRFoPb665e5RTML7bo6AGOrEBAlam5HL1HbQolEbM2EqjcTGDvwyy6xbOnx2ixoawGMBsK%2BjMmurMoZYM0zTXpTrlWB0mUALb52gdXSUXFE78Yx8%2BpY%2BR6pYNOGAV8iNnC0J%2BUupLOWgodRiSmi9plwHyQolT7c0AwICjBZdpXlX3UibHI8lwLorhZuKQ8Z0cyk5qV8CrkStaN8DRxSubtZzvoySJvMukpblHc%2FHH5%2F6kNoo%2BG4R%2B%2Bjrpbpzlwvf%2FXRt4&X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Date=20230308T205939Z&X-Amz-SignedHeaders=host&X-Amz-Expires=300&X-Amz-Credential=ASIAQ3PHCVTYQ2KJ47PG%2F20230308%2Fus-east-1%2Fs3%2Faws4_request&X-Amz-Signature=c4aed47755c3eacde076d3bea24f5817d8d36403f6eab6f7fd62c8eea682b6e4&hash=9d44b29826b9326174ec0b117beb171afe779afe4208344ea3251bcf74889f75&host=68042c943591013ac2b2430a89b270f6af2c76d8dfd086a07176afe7c76c2c61&pii=S0960148113005727&tid=spdf-f77b6c55-4fd1-4f53-98fc-ee963bcfbdae&sid=19c93fa72deeb24a359846c2f9c834f9b8b5gxrqa&type=client&tsoh=d3d3LnNjaWVuY2VkaXJlY3QuY29t&ua=13105801500b5250035f&rr=7a4e00d19bae681a&cc=us The turbines have to be taken offline for maintenance more often as they degrade, thus leading to a decline in power output. Eventually, the output becomes so small and intermittent, that the project is no longer profitable to run. This will inevitably lead to a premature shutdown. This premature shutdown means the original emissions reduction calculations mentioned above would have been too optimistic. BLM needs to do much more due diligence when it comes to evaluating the claims of various project applicants regarding the lifespans of their proposed projects. For this specific project, the emissions reduction calculations need to be redone using a realistic assumption about the lifespan of the project, which is going to be much less than 34 years.	The EIS cannot speculate what turbines, if any, would have any type of mechanical or structural issues that would take them offline and temporarily reduce the overall capacity of the project. Turbines would be maintained to avoid mechanical or structural issues. Replacement of turbine components would likely be part of ongoing maintenance.
7342-1	Matt F	Part of the justification for developing wind and solar energy projects is that doing so will "save" emissions that would otherwise be emitted from fossil fuel based power sources. For example, this reasoning can be seen on pp 3-136 of the Lava Ridge Wind Project draft EIS under the Avoided Emissions section. It states that it uses the EPA's AVERT modeling tool to forecast the amount of avoided emissions. What is not clear is how many variables this tool takes into account. If BLM is to be honest about the avoided emissions, it needs to take *all* aspects of the project into account, and total how much they will all emit. Some elements to consider: 1) The production and installation of the wind turbines themselves. They involve the manufacture of many tons of concrete and steel, which are both very carbon intensive production processes. Steel accounts for between 7-11% of global C02 emissions: https://www.globalefficiencyintel.com/new-blog/2021/global-steel-industrys-ghg-emissions Are these production emissions taken into account? 2) Wind and solar are generally installed far from the population centers which use the energy they generate. This requires the construction of long distance power transmission lines. For example, the EIS states in the Introduction on pp ES-i: "The project would consist of up to 400 wind turbines and associated infrastructure and a 500-kilovolt (kV) generation intertie transmission line" Constructing such a line would again require many tons of concrete and steel. It is unclear whether the emissions from the manufacture and installation of the transmission line components were included in the AVERT model. Further, other forms of power such as natural gas fired power plants, are usually constructed closer to population centers, and thus need less transmission line construction. So for honest accounting, BLM should consider these differences in infrastructure emissions when comparing wind and solar to other forms of energy production. 3) Wind and solar are intermittent, so it is expected that they will be coupled with some kind of energy storage system in order for the energy they produce to be more predictable and reliable. For example, the EIS states on pp 3: "and a battery storage facility" And also on pp ES-ix: "the capacity of the battery energy storage system would be determined in the final design phase" Not only is the size of the battery not known at this point, the type is also not stated in the EIS. With these unknowns, it's unlikely that the AVERT model included the emissions from the battery production. Much like the comparison of transmission line distances above to other power sources, a comparison of battery production emissions to other power sources which do not need batteries should also be figured into the calculations. In addition to these, there are other construction elements listed on pp ES-ix of the EIS whose manufacture and installation will emit air pollutants. BLM should be both fully transparent and comprehensive in its analysis of avoided emissions.	EIS Table 3.4-6 estimates the annual and 5-year emissions that would be emitted if an equivalent amount of energy was generated via fossil-fuel combustion and are thus emissions that are avoided by implementation of the project. Transmission lines are required to transport the power generated by wind and solar; fossil fuel–generated power requires pipelines and trains/trucks in order to transport the coal to coal combustion facilities to transmission lines and natural gas from wells to storage to refineries to natural gas power plants to transmission lines. While it is true these emissions represent only a piece of the lifecycle GHG emissions of fossil fuel electricity generation, installed wind turbines harnessing the wind for electricity generation is also only a piece of the lifecycle wind power. The BLM has compared the emissions at the point of electricity generation rather than the entire lifecycle because lifecycle emissions can vary greatly depending on project specifications. Guessing where turbines or batteries would be manufactured and their delivery route to the project site would be speculative.

Comment ID	Commenter	Public Comment	Response to Comment
8-1	Patrick Williams	Secondly, if this project is being done to add to 'carbon neutrality' a better study is needed to prove this. Between manufacturing, blade degradation and disposal impacts, maintenance, and access impact to the land to build and sustain the wind farm is rarely, if ever, more beneficial to the overall environment.	EIS Table 3.4-6 estimates the annual and 5-year avoided emissions for the operation of the project. While it is true these emissions represent only a piece of the lifecycle GHG emissions of fossil fuel electricity generation, installed wind turbines harnessing the wind for electricity generation is also only a piece of the lifecycle wind power. The BLM has compared the emissions at the point of electricity generation rather than the entire lifecycle because lifecycle emissions can vary greatly depending on project specifications. Guessing where turbines would be manufactured and their delivery route to the project site would be speculative. Also see response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Text was added in Section 3.4.1.
878-2	Cathy Lee	The next question is how much fossil fuel is used to make and maintain these turbines? Are wind turbines really clean energy after everything is considered?	EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) estimate the direct and indirect greenhouse emissions. These emission estimates represent the project's direct and reasonably foreseeable indirect GHG emissions. Emissions resulting from the manufacture of the turbines are speculative and beyond the scope of this EIS.
967-1	Sue (No Last Name Provided)	Everything is connected! Wind energy has a HORRIBLE RECYCLE FEATURE and the discarded parts emit harmful gasses into our air quality.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Refer also to applicant-committed measure 84 "MVE would prioritize the re-use, recycling, or scrap value of decommissioned project components over direct disposal in approved landfill facilities. Recyclable materials would be recycled to the furthest extent practicable. Non-recyclable materials would be disposed of in accordance with state and federal law."

Cultural Resources and Native American Concerns

Table A-3g. Cultural Resources and Native American Concerns

Comment ID	Commenter	Public Comment	Response to Comment
10501-2	Kimi Ynigues	Minidoka should be formally designated a National Historic Landmark. Has it been assessed as a Traditional Cultural Property? If a Japanese American Ethnography has not been done the project should be halted until one has been completed. With adverse impacts to Native American (Indian) communities also taken into consideration	As noted in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), Minidoka NHS is a nationally significant site listed on the NRHP under Criterion A (historic event). Regarding a Minidoka TCP, see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). See EIS Section 3.5.5.4 (Compensatory Mitigation) and measures VI and VII in Table App4-5 in EIS Appendix 4. Consideration of potential impacts to Japanese American and Native American communities are addressed at EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources).
11198-2	Lori Wright	A historic and cultural survey has not been done. This leaves potential known and unknown sites vulnerable to destruction.	As noted under EIS Section 3.6 (Cultural Resources), the BLM has used previously existing cultural resource information in support of its consideration of the affected environment and for impact analyses, including information and data from prior historical and cultural resource surveys that have been conducted throughout the APE. At the time of this response, the BLM is developing a PA to complete the NHPA Section 106 process, which also includes cultural resources identification prior to construction beginning on the project and the resolution of adverse effects to historic properties under Historic Properties Management Plans. For more detail, refer to EIS Section 3.5 (Cultural Resources) and the draft PA (EIS Appendix 8).
11315-1	Karen Atkinson	The DEIS, Section 3.5 Cultural resources, does not address the significance of the Minidoka Relocation Center to Alaska Natives and the significant impacts the project would have on those tribal interests. Consultation with Alaska Native tribes and organizations on the historic and cultural impacts of the project is essential to complying with the National Historic Preservation Act, Government-to-Government consultation requirements, American Indian Religious Freedom Act, EO 1307 (May 1996, Indian Sacred Sites), Memorandum of Understanding Regarding Indigenous Sacred Sites (2021), and Indigenous Knowledge Guidance (CEQ, November 2022).	The BLM understands that Alaska Natives, including Alaska Native spouses and mixed Alaska Native and Nikkei children, were among the Nikkei population incarcerated at Minidoka WRC. The NHPA Section 106 consulting parties representing the Minidoka-connected community include those with direct ties to Alaska, such as the Alaska Chapter of the JACL, and those from Alaska territory. The BLM is consulting with Native American Tribes with ancestral ties to the project area (see EIS Appendix 10, Section 106 Consultation and Government-to-Government Tribal Consultation). Alaska Native Tribes were not directly among interested parties or stakeholders identified during initial project scoping or through the NHPA Section 106 consultation process. Also see response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding the DOI's trust responsibilities, specific Treaties that relate to federally recognized Tribes with ancestral ties to the project area, and the EIS's full consideration of impacts to resources that may be associated with tribal rights or interests.
11534-18	Matt Arnold, William Eubanks	The Project Threatens to Permanently Impair the Milner-Gooding Canal, an Historic Site Eligible for Federal Protection The DEIS makes clear that the Project will stand in the immediate vicinity of the Milner- Gooding Canal ("Canal"), a roughly 76-mile-long irrigation canal that connects the Milner Dam to the Big Wood River. DEIS at 3-6, 3-377. Built in conjunction with the Milner Dam in 1905, the Canal has "national significance in agricultural history" as an early example of the kind of public-private reclamation project that helped turn southern Idaho into the agricultural powerhouse that it is today. See, e.g., History of Milner Dam, TWIN FALLS CANAL CO., https://bit.ly/3mNLwYv (last visited Apr. 18, 2023); see also National Register of Historic Places Inventory Nomination Form: Milner Dam and the Twin Falls Main Canal (June 11, 1986), https://bit.ly/3MVb0xM Based on this, it is SLR's understanding that the Canal (including three separate camp sites used when constructing the Canal) is eligible for listing in the National Register of Historic Places, 36 CFR § 60.4, and protection under the National Historic Preservation Act, 54 U.S.C. § 3001 et seq. However, the DEIS does not discuss potential	Historic sites such as the Milner-Gooding Canal are addressed under EIS Section 3.5.4 and 3.5.5 and, accordingly, assessed throughout the Cultural Resources sections at Section 3.5. Appendix 9 (Cultural Resources Potentially Affected by the Action Alternatives) of EIS Appendix 8 summarizes cultural resources within the physical and non-physical APE for the project per action alternative and includes the Milner-Gooding Canal, and Milner Dam and Twin Falls Main Canal. Within Appendix 6 of EIS Appendix 8, the Milner-Gooding Canal is specifically considered regarding possible physical and non-physical effects to this historic property (see the row headed by Site Number(s) 53-17019/63-17895) and various other sites associated with the Milner Gooding Canal system are similarly assessed (see the very next row headed 53-17020). Appendix 6 of EIS Appendix 8 (see the row headed by Site Number(s) 53-17019/63-17895) specifically identifies that the Milner Gooding Canal would be subject to physical and non-physical impacts of the project. See also response to

Comment ID	Commenter	Public Comment	Response to Comment
		impacts to the historic nature of the Canal, or whether the Project will impede its inclusion in the National Register. This must be addressed before the Project moves forward.	comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding identification and assessment of effects to historic properties prior to project construction.
11535-54	Steven Andersen	The Analytical Framework provided for in the DEIS is flawed for numerous reasons. The physical analysis area for the APE (including physical impacts such as ground disturbance from construction, fugitive dust generation from traffic and construction) is based on conjecture, since admittedly, turbine sites and road locations have not yet been determined. The non-physical APE is also inadequate as the analysis fails to account for key impacts to sacred cultural and historic sites (see comments herein related to visual impacts and cumulative impacts). There should have been a comprehensive inventory conducted with the input and assistance of local Tribes, Japanese American and Alaska Native communities that accounted for what could be impacted by construction and the footprint of planned turbines (including burial sites, fossils and observance points) – or within the shadow of their noise and visual impacts. Rather, the DEIS relies on planned efforts to prepare a Programmatic Agreement and associated historic properties management plan. The Project area has a large number of cultural resources, and certain impacts to those resources will admittedly be significant and unable to be addressed through mitigation (see sound, environmental justice, visual impacts and cumulative impacts comments herein).	As described at EIS Section 3.5.4 (Physical Impacts), the physical APE allows for micro-siting of infrastructure to avoid physical impacts to cultural resources identified within the siting corridors. The physical and non-physical APE differ by action alternative. Action alternatives were developed with consideration for avoiding or minimizing Project impacts, including to cultural resources, and through incorporation of concerns identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. Previously recorded sites and the range of cultural resources potentially present in the project area of potential effects are addressed under EIS Section 3.5.4 and 3.5.5 and, accordingly, assessed throughout the Cultural Resources sections at Section 3.5. Appendix 9 (Cultural Resources Potentially Affected by the Action Alternatives) of EIS Appendix 8 summarizes previously recorded cultural resources within the physical and non-physical APE for the project per action alternative. As stated in the Introduction, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as intensive field survey. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. The BLM is developing a PA to complete the Section 106 process, which would include additional cultural resources identification efforts prior to construction beginning on the project and the also would require the resolution of adverse effects to historic properties under Historic Properties Management Plans. For more detail, refer to the draft PA (EIS Appendix 8), which is a working document subject to revisions deemed necessary to address public concerns per public and consulting party comments. The PA for the project would require a HPMP that is to include a monitoring and discovery plan for cultural resources, including planning for the discovery of burials). The HPMP is to include the finalization of protection measures and any monitoring areas, according to the PA. Per the stipulations of the PA, the BLM is to consult upon the HPMP with consulting parties before approving the final HPMP. The field surveys and monitoring under the PA can include trained tribal monitors or those from other affected communities, should Tribal Nations or those from the Japanese American community choose to directly participate in survey and monitoring as recommended within the comment.
11546-5	Dan Sakura	No Action. I encourage BLM to adopt Alternative A – No Ac□on. To protect Minidoka and provide renewable energy companies with helpful siting information (to avoid high conflict areas), I respectfully request that BLM work with the National Park Service -- Keeper of the Register to determine the Minidoka Traditional Cultural Property as eligible for listing on the National Register and begin a public process to designate the Greater Minidoka Area of Critical Environmental Concern.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11547-5	Lowell Ihler, Carol Ihler	5. The Hunt Relocation Center will be impacted by the turbines. This is a slap in the face to those whose families were "relocated" there during WW II. This is a National Historical Site and should be preserved. As a country we already took everything from innocent people and we do not need to do it to them again. Many descendants of the Japanese return to the "camp" each year to teach their children about what happened and to help heal the trauma. The same thing goes for the Native Tribes of indigenous people who have been treated so badly in the past and who depend on this land the wind turbines are to be located on as gathering places for certain plants for ceremonial use and also contains lands that are considered sacred by these people.	Impacts related to the survivors and descendants of those incarcerated at Minidoka WRC and to Native American Tribes in terms of environmental justice are addressed at EIS Sections 3.6.1 (Environmental Justice Communities). Impacts related to cultural resources, Native American resources, and Minidoka NHS and the surrounding Minidoka WRC are addressed at EIS Section 3.5 (Cultural Resources), specifically Section 3.5.1 (Native American Resources) and Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site). See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding a Minidoka TCP. Per EIS Appendix 8 (Cultural Resources Programmatic Agreement), minimization and mitigation measures for resolution of adverse effects to historic properties will be determined in consultation with signatories and with input from Tribes, consulting parties, including the Japanese American community, and the public, and finalized under HPMPs under the PA. In its regulatory review of the project, the BLM is weighing the concerns identified through project scoping and comment periods, Section 106 consultation with Native American Tribes and other consulting parties, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding visual impacts and minimization or mitigation measures.
11557-4	Deanna Weigel, Andy Weigel	Avian and Bat Species: no demonstrated replacement habitats nearby for bats, no actual remedy for white-noise syndrome, and insufficient plans for conservation strategy.[...] Environmental justice, cultural resources: mitigation measures are entirely insufficient to make up for the lost cultural resources that impact not just members of tribes and Japanese American stakeholders, but to all the citizens of the region.	Mitigation measures related to cultural resources are addressed at Cultural Resources EIS Sections 3.5.4.2 and 3.5.5.2, as they relate to physical and non-physical impacts, respectively. Other measures for avoidance, minimization, and mitigation for resolving adverse effects to cultural resources are addressed in the PA (see EIS Appendix 8 and Section 3.5.3 [Programmatic Agreement]) and will be included in the HPMP and HPTPs and in the monitoring and discovery plan tiering to the PA. Such measures will be determined in consultation with signatories and with input from Tribes, consulting parties, and the public, and finalized prior to project construction.

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			Mitigation measures related to environmental justice impacts are discussed in EIS Section 3.6.1.4.1; as explained in this section, the proposed compensatory mitigation measures would largely aim to compensate for impacts indirectly but would not directly reduce potential impacts to the setting and feeling of Minidoka NHS. Therefore, the BLM and the Office of Collaborative Action and Dispute Resolution continue to solicit input from members of the Japanese American and Minidoka-connected communities and additional mitigation measures will be considered for inclusion in the PA (draft provided as EIS Appendix 8) and in a compensatory mitigation plan for Minidoka NHS (Mitigation Framework provided in EIS Appendix 4). Note that not all cultural resources in the area of potential effects would be adversely affected. At historic properties that would be unavoidably adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (pursuant to NHPA Section 106 and as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties. The mitigation of adverse effects, following the EIS and pursuant to a PA, can be other than measures that would preserve, restore, or rehabilitate a historic property and follow the alteration of historic properties and the diminishment of the integrity that makes them eligible for NRHP listing. Compensatory mitigation measures VI and VII (see EIS Appendix 4, Table App4-5) could be applied to any action alternative if the BLM determines it is warranted. Compensatory mitigation measure VII includes a Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site section that has been added to the final EIS (see EIS Appendix 4). See response to comment 11557-3 (see in Table A-3b, Bats) regarding avian and bat impacts.
11577-1	David Inoue; Japanese American Citizens League	As such, it is vitally important that BLM engage in the process to establish the Minidoka National Historic Site as an Area of Critical Environmental Concern due to the special cultural value that the Minidoka holds for the Japanese American community.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11585-1	Preservation Idaho	the lack of a complete survey in the area of impact will result in likely damage to cultural and historic sites. They cannot be protected if they are not surveyed and documented appropriately before any work is done. Over 80% of the impacted area has not been surveyed; the potential for damage to unknown resources of this scope is not acceptable by any industry standards. Disturbance of the ground, blasting, traffic, dust, and noise will all contribute to potential and permanent damage. The BLM's plan for a "phased identification, evaluation, and resolution of adverse effects..." (Programmatic Agreement, #10) is not adequate. A complete picture of cultural resources that will be impacted should be known ahead of any work done so that planning for the preservation of sites and artifacts can be properly managed.	See responses to comments 11198-2, 11557-4, and 12338-9 (see in Table A-3g, Cultural Resources and Native American Concerns), where the adequate analysis of impacts to cultural resources is previously addressed. The PA (see EIS Appendix 8) does adequately address and would complete phased identification, evaluation, and resolution of adverse effects in accordance with the regulations for the Section 106 process (at 36 CFR 800) and in compliance with the NHPA.
11598-10	Idaho Conservation League	Cultural Resources The proposed Lava Ridge Wind Project is located in a vast area of southern Idaho rich in cultural history dating from prehistoric times and continuing into the modern era. ICL is concerned that portions of this project area will either directly or indirectly impact cultural or historic areas worthy of preservation. Magic Valley Energy/LS Power and the BLM must comply with federal and state laws and regulations that are meant to protect these irreplaceable resources, including Section 106 of the National Historic Preservation Act and related Code of Federal Regulations; the Archaeological resources Protection Act of 1979; the Native American Graves Protection and Repatriation Act; Idaho Code title 67, Chapter 41; and Idaho Code title 27, Chapter 5 (Sections 27-502 through 27-504). Further, Native American resources (natural and cultural) may be protected under the American Indian Religious Freedom Act of 1978). The Crater of the Moon National Monument Resource Management Plan (Monument RMP) provides additional direction regarding cultural resources: Cultural Resources BLM will manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained or enhanced consistent with State and Federal laws. -Monument RMP, p. 26. and Economic and Social Considerations BLM will ensure that any management action undertaken in connection with this plan is cost-effective and takes into account local social and economic factors. -Monument RMP, p. 27. The DEIS indicates that within the 197,474-acre Alternative B project area, there are 199 documented historic properties within the siting corridors (Table ES-2). Further, there are a total of 1,788 recorded historic properties within the visual range of the non-physical Area of Potential Effect (APE). The DEIS also reports 42 recorded historic properties within the auditory APE. However, only 17% of the physical APE has been subjected to intensive Class III pedestrian survey (DEIS, p. 3-183). ICL is concerned that the DEIS does not accurately portray the full potential impacts and adverse effects to cultural resources for several reasons. First, the cited 17% of surveyed project area does not represent a quarter of the potential lands affected by Alternative B. If one were to project site density for the entire physical APE as described in Alternative B, using the assumption that site density remains at currently documented levels and raising the surveyed lands to 20%, then we can expect fully completed pedestrian surveys to result in roughly 1,000 historic properties, with 800 of those having yet to be identified and documented. The public cannot be expected to recommend an alternative with the least amount of adverse affects without knowing the full measure of the potential impacts to cultural resources. Second, site density likely will not exhibit as projected in the scenario above. In fact, historic properties may be clustered based on topography, available resources, or proximity to large and significant sites. The DEIS states that, “based on….previous surveys, cultural resource sites occurred at the approximate frequency of three sites per square mile in those previously surveyed areas of the physical APE. This would result in an estimated potential for 43 total cultural resource sites to be present in the 14 square miles of project disturbance” (p. 3-165). BLM would be remiss to rely on a model predicting three historic properties per square mile, especially the same Class I records search that reveals that 199 sites are located within the 17% of the physical APE subjected to previous surveys. If the statistics cited on page 3-165 are in fact a typographical or mathematical error, we	The BLM is proceeding with cultural resources management consistent with applicable state and federal laws. Cultural resources management is addressed under EIS Section 3.5 (Cultural Resources) and local social and economic factors under EIS Section 3.6.1 (Environmental Justice Communities). Impacts analyzed under the EIS are not limited to cultural resources or environmental justice communities, and extend to the fuller environment containing the project area. Should the BLM choose to approve the project, approve the project with modifications, or not approve the project, cultural resource and environmental justice impacts will be considered in relation to other environmental impacts and will not be the sole matter informing BLM decisions. As stated in the EIS Introduction, the EIS analyzes and discloses the potential environmental impacts of MVE’s project and alternatives for BLM decision making. The EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, including through additional new studies. EIS Section 3.5 analyzes the full range of impacts to known cultural resources and a range of impacts to estimated cultural resources in the areas of potential effects. EIS Section 3.5 (Cultural Resources) provides background on previous cultural resource identification efforts in the project area. Review of Idaho SHPO, NPS, and BLM cultural resource records finds that documented cultural resource field surveys cover approximately 17% of the area where physical effects from the project could result, such as within the project siting corridors. The EIS accurately represented that 59 of the 199 cultural resources identified by previous cultural resources in the project vicinity were identified in 17% of the project area of potential effects by projects of comparable size to the current endeavor. As stated in the EIS, surveys not comparable and outside of this 17% of the area (and 140 out-lying sites) were excluded from the calculation; therefore, the relative frequency or density of cultural resources sites is accurately stated for the intents and purposes given in the EIS. No correction is needed. The BLM understands that cultural resources may not be evenly distributed across the area of potential effects for the project; however, the BLM’s projection of potential cultural resource numbers across the project alternatives does not rely on cultural resources density but rather on the proportionality of cultural resource occurrence across different action alternatives to compare the relative potential for impacts (including cumulative impacts) between the alternatives—whether evenly distributed or not. The analysis is only comparative and does not claim to be predictive (as of real-world cultural resources locations or traits). The PA for the project would require a range of additional field inventories of cultural resources to fine-tune and manage actual historic property concerns, should the project proceed under any of the action alternatives prior to the project having notice to proceed with construction in those areas. However, the 83% of the project APE that has not yet received field surveys would not necessarily need field surveys and the EIS does not intend to imply that it would. Many of the alternatives to the Proposed Action would include much less extensive project siting corridors and infrastructure, including the BLM’s Preferred Alternative. Even within those corridors and

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		recommend the BLM correct the error in a Supplemental DEIS. Fully completed surveys will reveal whether historic properties cluster in specific areas or if there are open spaces void of either prehistoric or historic cultural resources. These spatial patterns can help determine the most appropriate alternative that would least impact cultural resources in general, as well as specific historic properties of concern to Tribes. The BLM and Magic Valley Energy are obligated to complete surveys of all the potentially affected areas, and include those results in the resulting EIS. Since this has not been completed, we recommend that the BLM/Magic Valley Energy conduct Class III pedestrian surveys in the remaining 83% of Alternative B's physical APE that have yet to be surveyed and document the results of those investigations in a supplemental EIS. While current Section 106 compliance allows for the completion of phased resource identification and mitigation, pushing resource identification and evaluation out to an unknown future date strips the public of the ability to make informed recommendations and suggestions based on potential impacts to said resources. Further, the BLM and Idaho State Historic Preservation Office (SHPO) cannot make reasonable assessments regarding the project's cumulative impacts to cultural resources without knowing what resources are located within the physical APE, including potential transmission lines and roads. Archaeologists have identified numerous lava tubes and caves containing pre-and protohistoric cultural remains throughout the region, and it remains quite likely that investigators will discover previously unidentified cultural resources during pedestrian surveys within the physical APE. The BLM and Magic Valley Energy should avoid these resources whenever possible by relocating proposed roads, turbines, and associated infrastructure, and mitigate the impacts to these resources through excavation and data recovery efforts when necessary. Failure to avoid historic properties will result in permanent impacts, as is demonstrated in the DEIS, where the BLM states that, "If not avoided, the impact duration for physical effects to cultural resources is long term because cultural resources are non-renewable resources. Physical impacts would be permanent (emphasis added)," (DEIS, p. 3-146). ICL recommends that the BLM include an analysis describing how irreversible and irretrievable losses of cultural sites, Tribal treaty rights and TCPs will be mitigated. We believe that the compensatory mitigation section of the DEIS fails to offer or describe significant mitigation measures as related to historic properties and/or cultural resources. The DEIS states that, "any adverse effects would be resolved through treatment measures specified under the Historic Properties Management Plan (HPMP) and Historic Preservation Technical Procedures (HPTPs) as part of the P.A.," (p. 3-171 - 3-172). However, neither the HPMP nor the HPTP were included in the DEIS in whole or draft form. These documents must be completed with all mitigation measures, including compensatory mitigation, identified. True compensatory mitigation ideas may include land acquisition to replace impacted areas at a higher rate than affected parcels, including a potential timeframe and mechanisms for acquiring said parcels. We recommend that the BLM fulfill these NEPA and Section 106 obligations in a Supplemental DEIS. We further recommend that the HPMP include on-site cultural resource monitoring during construction in areas of identified sensitivity or high historic property density. The monitoring program should be incorporated with education workshops as identified in the draft programmatic agreement. Native American Resources According to the DEIS, Native American Resources within the proposed Lava Ridge project area refer to cultural and natural resources that are "spiritually and culturally significant to Tribes, including resources for which Tribes have treaty-protected rights," (p. 3-149). These resources are protected by the National Historic Preservation Act (NHPA), the Archeological Resources Protection Act (ARPA), and Native American Graves Protection and Repatriation Act (NAGPRA), as well as the American Indian Religious Freedom Act (AIRFA), Executive Order (EO) 13007 (meant to protect and preserve First Nation's religious practices) and Joint Secretarial Order (JSO) 3403 (which establishes how the Departments of Agriculture and Interior will fulfill their obligations to Federally recognized Indian Tribes). There are numerous natural resources and geographic locations within the cultural landscape that retain significant cultural and religious importance to the Shoshone-Bannock Tribe and other Tribes. Wilson Butte and the associated cave, Kimama Butte Cave, and Sid Butte are examples of geographic locations that retain cultural and spiritual importance to the Shoshone-Bannock Tribe. Further, Wilson Butte Cave yields significant paleontological and archaeological contents and data that inform the human occupation of the Snake River Plain. Cave contents have been dated to 13,000 years ago, including prehistoric camel faunal remains that show signs of consumption (Christina Cutler, Shoshone-Bannock Tribe, personal communication, February 13, 2023). There are also numerous rock art sites distributed across the vast landscape. Other resources of concern to Tribes likely found within the project area are traditional cultural properties (TCPs). As is noted in the DEIS, because TCPs are considered culturally sensitive "they often remain undocumented for confidentiality reasons…..and may not be identified in the Class I report" (DEIS, p. 3-153). Any alternative associated with the Lava Ridge project must take these resources into consideration and the BLM must do the proper level of due diligence to ensure these resources are not adversely affected by project development. We also recommend that significant cultural sites such as Wilson Butte Cave be protected as part of a larger ACEC. Programmatic Agreement ICL is disappointed that the DEIS does not include the Historic Property Management Plan (HPMP), in draft or final form. The DEIS states that the HPMP will provide resource identification and documentation processes, which are critical to understanding how cultural resources will be approached and adverse effects mitigated for the Lava Ridge project. Further, Clause 9, containing the number of identified historic properties within the Physical APE, number of NRHP-eligible sites, number of unevaluated resources, and number of sites ineligible for inclusion to the NRHP is incomplete, even though these numbers are known and reported in the DEIS. The draft PA should be as complete and comprehensive as possible in order for the public to evaluate the proposed process and submit significant and meaningful comments. ICL recommends that the BLM thoroughly review the PA and provide complete available information. Clause 10 states that the potentially affected historic properties "cannot be fully identified and the effects on historic properties cannot be fully determined prior to the approval of the project due to the large area potentially affected, and timing of the BLM Record of Decision including the	infrastructure planning areas, the focus of Class III survey under the PA would be on the footprint of potential project disturbance, which represents smaller areas within those corridors and areas where turbines, transmission lines, and other project elements siting are proposed. Additional identification efforts would also occur outside of the planned physical disturbance, largely in areas of the non-physical APE, for further mitigation and managing visual impacts. Surveys for historic properties susceptible to non-physical impacts, primarily buildings and structure sites, would also not be conducted for 100% of the area but would be focused mainly on historic properties where adverse effects could result from the project. Cultural resources identification efforts under the PA are intended to be completed prior to project construction. The PA (see EIS Appendix 8) would further include considerations of avoidance, minimization, and mitigation for the full range of cultural resources where the BLM would require these measures (e.g., at NRHP-eligible historic properties). Archaeological data recovery would be one mitigation measure available under the PA. Irreversible and irretrievable losses of cultural sites, including as associated with Tribal treaty rights and TCPs, would be mitigated pursuant to the PA and the required HPTP under the PA, in addition to the mitigation considerations described in the EIS. Compensatory mitigation for cultural resources, as described in EIS Section 3.5.5.4, would be addressed in ongoing consultation with consulting parties to the PA and with PA implementation and, like compensatory mitigation for other resources, does not require the fully detailed mitigation plans to be completed prior to the ROD. The SHPO, Tribes, NPS, organizations, individuals representative of the Japanese American parties, and other qualified parties under the NHPA Section 106 process (36 CFR 800.2) have joined the NHPA Section 106 consultation process as consulting parties and may decide to sign the PA as relates to their role as consulting party. BLM-recognized consulting parties, as long as they participate and regardless of deciding to sign-on to the PA, have opportunities to review and consult on PA documents such as reports and plans, including the HPMP and HPTPs that would detail the historic property management and treatment pursuant to the PA. The BLM would not release the ROD for the project until the PA is executed. However, as noted above, it is unnecessary to finalize all planning that would occur under the PA (such as the completion of the HPMP) prior to the ROD. The BLM will consider the mitigation measures suggested in these comments for cultural resources and future updates to the PA will reflect comment-based changes as appropriate. The PA already anticipates cultural resources monitoring for the project. The PA is proceeding in accordance with the regulations at 36 CFR 800. The project analysis relies on siting corridors to maximize the avoidance of project impacts to historic properties and other environmental resources, to the extent practicable. Wind turbines and other project structures and activity areas may be micro-sited within the survey corridors for this purpose. The identification and treatment measures for historic properties under the PA will proceed with continued BLM consultation of the SHPO, Tribes, and other consulting parties. The PA includes post-review discovery should unanticipated historic properties or impacts to historic properties occur with the project proceeding, including at unknown lava tubes or caves. The BLM has endeavored to avoid impacts to known caves and lava tubes in response to Tribal and archaeological concerns received during consultation to date. The BLM's EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community knowledge and concerns—including on TCPs—identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. The BLM has accorded these consultation efforts with all due diligence and good faith. Regarding ACECs, please see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). No supplemental EIS is required since these comments inform the BLM's preparation of a final EIS.

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		authorized ROW area of the project," (Appendix 8, p. 2). However, Section C.1.b (Identification of Historic Properties, Identification within the Physical APE) states that the project proponent will, "fund a Class III-Intensive Field Survey within the Physical APE," determining the number, location, and condition of historic properties (Appendix 8, p. 9). The project proponent is clearly aware of its responsibilities under Section 106 of the NRHP and has committed to fulfilling this obligation. Therefore, stating that the properties cannot be identified and effects determined prior to project approval does not accurately represent a justifiable reason for postponing or delaying a Class III intensive survey of the Physical APE. The delay does align with an accelerated project timeline and the proponent's desire to fulfill the cultural resource mandate with a minimal expenditure of time and resources, focusing only on identifying historic properties within an approved Physical APE or alternative. However, the public cannot make meaningful decisions or recommendations without having a full complement of baseline data available for review. The project proponent must complete a full Class III inventory of the entire potential Physical APE in order to determine site locations and density and identify the least impactful alternative moving forward. Stipulation A.7.a provides assurance that methods and documentation standards on private lands will remain consistent with documentation and methodologies used on BLM-managed lands. However, when access to private lands is denied, Stipulation A.7.a states that the "[p]roponent shall ensure that additional measures are taken to identify and evaluate properties" (Appendix 8, p. 6), but those methods are not identified. Section B.6.b. outlines the minimum avoidance distance for ground disturbing activities and known historic property components to which Tribes attach religious or cultural significance. We recommend this distance be increased from the proposed 50 m to 100 m. ICL disagrees with the proposal as stated in Stipulation C.1.d, which outlines a phased Class III survey and resource identification. As we have stated earlier, these resources should be identified up front as part of the required baseline data necessary to make adequate environmental and cultural resource recommendations and determine the full potential adverse effects to historic properties. A phased mitigation or data recovery process is acceptable and is in fact the standard, or normal process for large projects such as Lava Ridge. However, full impacts cannot be determined without knowing the number, location, and condition of historic properties within the Physical APE. Stipulations G and H cover the process for developing the HPMP and HPTP for the Lava Ridge project. These critical components of the cultural resources section should have been developed and presented in the DEIS in draft form at the minimum. While we appreciate the BLM stating in the PA (Stipulation G.6.a.ii) that the agency will develop a plan for engaging the public in review and comment on the HPMP, we believe that the agency is missing an opportunity to engage the public regarding the HPMP during the DEIS review. And at the same time, by not having a draft HPMP or HPTP available for review, the BLM is creating additional demand for capacity and resources at a later time. We recommend that the BLM complete these documents and provide them to the public in a supplemental EIS. Finally, ICL notes that the National Park Service and/or stakeholders representing or associated with the Minidoka National Historic Site are not included as possible signatories to the Programmatic Agreement. We believe that this is an egregious oversight that should be corrected by including one or both parties as signatories to the PA.	
11615-6	Spencer Dixon	The EIS do not consider the geographic uniqueness of the area that is right next to craters of the moon national monument. Or the native american sites and other culturally important features such as the milner gooding canal. The canals are our valleys lifeblood and they were not considered in a cultural and historical context or what may happen to them if they are damaged by this project.	Native American [cultural] resources are addressed at EIS Section 3.5.1 (Native American Resources). These resources and historic sites such as the Milner-Gooding Canal are further addressed under EIS Sections 3.5.4 and 3.5.5 and, accordingly, assessed throughout the Cultural Resources sections at Section 3.5. Appendix 9 (Cultural Resources Potentially Affected by the Action Alternatives) of EIS Appendix 8 summarizes cultural resources within the physical and non-physical APE for the project per action alternative and includes the Milner-Gooding Canal, and previously recorded Native American resources. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. See response to comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding identification and assessment of effects to historic properties prior to project construction. Also, Appendix 6 of EIS Appendix 8 identifies all previously recorded in the project area of potential effect, including in the vicinity of Craters of the Moon National Monument and Preserve; although, the monument and preserve area are outside of the area of potential effects for cultural resources. EIS Section 3.16 (Visual Resources) further considers the Craters of the Moon National Monument and Preserve adjacent geography, including in relation to KOP information for that area.
11622-4	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	As the organizers of the annual Minidoka Pilgrimage, we understand the unique needs of survivors and descendants to be able to focus on the traumatic experiences of life at Minidoka, learn from other pilgrimage participants, and experience the sense of healing that the pilgrimage provides. We appreciate BLM adding KOP-16 (the view of the Honor Roll looking east). The views of the spinning turbine blades backlit by the morning light will dishonor those who served, those who did not come home and the sacrifices of Minidoka's 73 Gold Star families. One of the most important parts of the pilgrimage is the Closing Ceremony on the last day of the Pilgrimage at the Honor Roll, which is held in the morning to avoid the midday heat. At the closing ceremony, the audience faces the speakers and the reconstructed Honor Roll. It is a solemn occasion, similar to events honoring America's veterans at sites across the country. Along with a color guard and local veterans, we commemorate the military service of 1,000 Japanese Americans from Minidoka who served in the military. We clearly read the names of the 73 individuals who gave their lives to defend freedom while their families' freedom was taken away by their own government. This act unleashes a wash of visible and audible pain among the participants, as we create an opportunity to grieve together as a community both for the slain soldiers, and for our community as a whole. LS Power's deliberate decision to site the wind project in a location that serves as the visual backdrop of the Honor Roll reminds us of the Hood River incident in Oregon. In 1944, The American Legion removed 16 names of Japanese American soldiers from the county honor roll. After a national outcry, the	The BLM has identified action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape (see Cultural Resources EIS Section 3.5.5 [Non-Physical Impacts]). This includes action Alternative C, Alternative E, and the Preferred Action, which would each increase turbine setbacks from the Minidoka NHS and Honor Roll farther than would the MVE Proposed Action (Alternative B), as described in EIS Section 3.5. In the Proposed Action, MVE excluded development of project structures at Minidoka NHS, creating a minimum of 1-mile setback from the nearest project siting corridor to avoid physical impacts at Minidoka NHS facilities. However, as noted, the BLM is considering other action alternatives—including the BLM Preferred Alternative—that would yet further increase the distance between the nearest project turbines and Minidoka NHS. Under Alternatives C and D, the nearest project siting corridor (where turbines could be placed) would be 5.5 miles from Minidoka NHS Visitors Center and 6.4 miles from the Minidoka NHS Honor Roll. Under Alternative E, the nearest project siting corridor would be 8.5 miles from the Minidoka NHS Visitors Center and 9.0 miles from the Minidoka NHS Honor Roll. Under the BLM's Preferred Alternative, the nearest project siting corridor would be approximately 8.9 miles from the Minidoka NHS Visitors Center and 9.2 miles from the Minidoka NHS Honor Roll. Under all action alternatives, the majority of turbines would necessarily be farther from these historic properties

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		American Legion restored the names to the Honor Roll in 1945.1 It also reminds us that LS Power previously sought to build the SWIP-N line on a ROW that would have towered over the Honor Roll and entrance to the park. We cannot help but find ourselves wondering how LS Power's next project will threaten the Honor Roll once more. The size and location of both Alternatives C & E would distract participants' attention from commemorative events, time with families and friends (both new and old), and healing painful emotional wounds. For example, a vital part of our Pilgrimage are the tours on the site which offer detailed interpretation of all of the buildings and and locations on the park site, including the foundation of the reception building, the recreated guard tower, the Honor Roll, the replica fence, the swimming hole, the fire station, the visitor center, the root cellar, the baseball field, and Block 22. In both site tour and Closing Ceremony instances, we are compelled to note a commonality. We acknowledge the creation of the KOPs, but these do not convey how the full experience of our ceremony and tours would be impacted by the visual distraction of multiple walls of wind turbines. Furthermore, if walls of wind turbines are built, each time they are on the site, survivors and descendants of the incarceration would be confronted with yet another piece of physical evidence as to how the United States government has dishonored their histories at this place. They would unfortunately also be reminded that Federal tax credits and tax dollars helped to fund and subsidize this project, and would have cause to once again question the United States' promises to right wrongs against us and offer us the dignity and justice we deserve.	than the nearest project siting corridor. The BLM's Preferred Alternative would have fewer turbines than any other action alterative (3 MW or up to 5 MW), as well as potentially shorter turbines than other action alternatives, reaching no greater than 600 feet tall at turbine tip with use of 5-MW turbines (in contrast to other action alternatives, which could use up to 6-MW turbines reaching 740 feet in height at blade tip). The EIS sufficiently analyzes the visual impacts of the 3-MW to 6-MW turbines that would be constructed for the current project, in consideration of the project's landscape setting and features, as related to cultural resources (Section 3.5) and visual resources (Section 3.16). The BLM will continue to consult on protection measures for historic properties, including those associated with Minidoka NHS. See EIS Section 3.16 and cited supporting documentation for the basis of KOP selection. Visual simulations and the KOP analysis are meant to be aspects of the visual impact analysis that help describe the present environment and the project as they would appear on that environment under the action alternatives. EIS Section 3.16 presents the basis of the full visual impacts analysis, including in relation to Minidoka NHS, and EIS Sections 3.5 further considers the adverse effects the project would have on Minidoka NHS and its surroundings as a historic property. KOPs for the project were chosen and agreed upon by the BLM and NPS for representation of Minidoka NHS and their analysis conforms to BLM standards for visual resources management as cited in EIS Section 3.16 (Visual Resources).
11622-10	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	We support Alternative A – the No Action Alternative – and respectfully request that the BLM seek public comment regarding the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC) and work with the NPS and State of Idaho SHPO regarding the Minidoka Traditional Cultural Property (TCP) National Register eligibility determination...Preserving Minidoka as sacred ground by beginning the ACEC process is critical to help advance racial justice, healing and equity.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11622-11	Erin Shigaki,Stephen Kitajo; Minidoka Pilgrimage Planning Committee	Pilgrimage and Traditional Cultural Property We support the findings in the Minidoka Traditional Cultural Property (TCP) Report that the TCP is "… significant because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. TCPs draw upon a community's traditions, defined as the …beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices." These practices include annual pilgrimages which we have organized both in-person and virtually (during COVID), annually.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11629-3	Ruth Harder	-There are so many unknown artifacts of prehistoric people in the area. Has this area been thoroughly investigated?	See response to comment 11535-54 (see in Table A-3g, Cultural Resources and Native American Concerns).
11634-4	Name Not Provided	The EIS is inadequate because of its failure to fully investigate impacts to Native American Communities. Scoping documents state that "The BLM invited the Shoshone-Bannock Tribes, Shoshone-Paiute Tribes, and the Northwestern Band of the Shoshone Nation to engage in government-to-government consultation regarding the project. Formal consultation has begun with the Shoshone-Paiute Tribes and the Shoshone-Bannock Tribes. The formal Tribal consultation process will continue throughout the NEPA analysis, and a summary of this process will be included in the EIS." No adequate summary of this process is included in the DEIS. Further, the Ft. Bridger Treaty of 1868 states that the Shoshone people "...shall have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts." The losses of game (elk, deer, antelope) noted for all alternatives investigated in the DEIS (except the no action alternative), represent a violation of this treaty agreement.	The BLM is consulting with Tribal Nations on the project, including regarding significant cultural resources under NHPA Section 106. Tribal consultation is a requirement of Section 106. The BLM continues to consult with Tribal Nations, including the Shoshone-Bannock. A description of consultation and a list of consulting parties may be found in EIS Appendix 10. Regarding the effects to treaty rights and game animals, see responses to comments 11808-3, 11860-3, and 11869-20 (see in Table A-3g, Cultural Resources and Native American Concerns).
11661-5	Sam Kito Jr	Traditional Cultural Property (TCP) description. We encourage the BLM to consider the impacts of the Lava Ridge project on the Minidoka Traditional Cultural Property (TCP), which has connections to Japanese Alaskan/Alaska Native families wrongfully incarcerated at Minidoka.4 The Minidoka TCP is connected to the cultural practices or beliefs of the living Japanese Alaskan community. It is rooted in our community's history and important in maintaining our continuing cultural identity. We agree with the TCP Report's findings Minidoka's "viewshed is an integral part of the visitor experience. Therefore, significant changes to this expansive, largely unobstructed viewshed would have negative consequences and adverse impacts to the integrity of the TCP."5	See responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11315-1 (see in Table A-3g, Cultural Resources and Native American Concerns). Physical impacts to Minidoka WRC and non-physical visual and auditory effects to Minidoka WRC and Minidoka NHS are addressed at EIS Section 3.5 (Cultural Resources).
11661-8	Sam Kito Jr	Indigenous Knowledge. The Biden Administration has issued guidance to federal agencies to consult with Indigenous people and incorporate Indigenous Knowledge in the federal land management decisions: "consultation and collaboration with Tribal Nations and Indigenous Peoples is critical to ensuring that Indigenous Knowledge is considered and applied in a manner that respects Tribal sovereignty and achieves mutually beneficial outcomes for Tribal and Indigenous communities." 9 Unfortunately, the BLM did not actively consult with Japanese Alaskans during the DEIS process. While the forced relocation of Japanese Alaskans has led to disconnections with traditional knowledge, we continue to have Indigenous Knowledge as it relates to our wrongful incarceration. Inadequate Description of Authorities Relating to Sacred Sites. The BLM's DEIS does not adequately describe the list of authorities relating to Tribal Sacred sites. For example, the DEIS does not list Executive Order 13007 – Indian Sacred Site which requires federal agencies to: "avoid adversely affecting the physical integrity of such sacred sites." Pilgrimages to Minidoka and other Japanese American incarceration sites are associated with a unique form of religious beliefs held by survivors and descendants: "Rituals play an important role in the preservation of memory as they involve the active bodily participation of all those who are present. Japanese American civil religion similarly involves rituals that bring a community together to remember	See responses to comments 12159-8, 12159-9, and 11661-5 (see all in Table A-3g, Cultural Resources and Native American Concerns). The BLM is consulting with Tribal Nations and the Japanese American community on resources of concern to each, including regarding significant cultural resources under NHPA Section 106. See also EIS Appendix 10 regarding BLM consultation on the project. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.

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		the past for the sake of the present. These modern-day rituals, such as the annual pilgrimage to Manzanar that opens this article (and the Tule Lake Pilgrimage, which began in 1974), initially brought together Japanese Americans, mainly Sansei, who often lived in the shadow of their parents' and grandparents' silence, and helped them begin to recover a shattered past. As Joanne Doi explains: 'These [events] were attempts to search out the truth of the history bound up in the silence of the Nisei and the classroom. The magnitude of the silence of the Nisei helped form the voice of the Sansei; the Nisei's absence of outward emotional response mobilized the Sansei to begin to speak out.'48 In a significant sense, the annual pilgrimages and Days of Remembrance prepared the way for more intense struggles (the fight for redress) and extended projects (the Japanese American National Museum). 10 Today, the U.S. Government serves as an excellent steward of the Vietnam Memorial on the National Mall in Washington, D.C., where Harry Kito's name is inscribed. The Minidoka Honor roll serves as a similar purpose for our community. We encourage the BLM to listen to those directly impacted by the incarceration and preserve Minidoka as a place for learning, healing and honoring Japanese Alaskans who overcome prejudice to rebuild their lives and serve our country during war and peace.	
11667-8	Alisa Bowman	Concern: Archaeological/Anthropological Sites The area has one of the oldest-known sites that provides evidence of human presence on the Snake River Plain prior to 10,000 years ago. Please do your job and protect the area for future generations to enjoy and not those out for-profit and desecration of this land.	See responses to comments 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns), 11860-4 (see in Table A-3g, Cultural Resources and Native American Concerns), and 11915-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
11672-4	Teiko Saito	As was the case with all World War II Japanese American internment camps, Minidoka was selected as a site because of its isolation and the desolation of the surrounding landscape as far as the eye could see. This makes the viewshed from inside Minidoka (looking out) just as valuable an integral part of the National Historic Site as the actual designated acreage within Minidoka itself. Unfortunately, neither of BLM's preferred Alternatives adequately protects the viewshed of Minidoka from harm and will permanently mar and diminish the ability of visitors to Minidoka to personally experience that same sense of isolation felt by the incarcerated Japanese Americans within the internment camp.	See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11753-4	Mary Rios	As a fourth grade teacher, that teaches Idaho History to my students and future leaders of our state, we study the Native American tribes that have inhabited our state. One of the tribes that we have studied is the Shoshone-Bannock tribe. On page 223 of the EIS statement, it states "The Shoshone-Bannock Tribes specifically voiced concerns that the project would impact traditional Tribal resources relating to hunting, gathering, and other practices. The Shoshone-Bannock Tribes voiced concerns about severe cultural and spiritual impacts on their members, dark skies concerns related to turbine lighting that would present severe effects to Tribal practices in the area, and concerns for the diminishment of their exercise of Treaty Rights in the area. The Northwestern Band of Shoshone Nation described their specific concerns relating to the impacts to wildlife, to wildlife habitats and corridors, and to migratory birds as they all apply to the rights and trust responsibilities defined in their treaties. Tribes have expressed that they hold wildlife spiritually and culturally significant and that includes everything about the wildlife's lifeways (habitat, migration tendencies, mating, etc.). Vegetation is another aspect of the natural environment Tribes hold spiritually and culturally significant, and wild plants continue to provide a primary source of subsistence for many Tribal members. These resources and associated practices in some cases involve places in which Tribes hold treaty rights, as well as broader areas to which they ascribe cultural significance." Why are we not listening to these tribal members, as they were given treaties that should protect these rights that they were granted by the government? The Native Americans from 7 different tribes migrated all over this state. I am sure there are many different burial grounds from the Shoshone and Bannock tribes specifically, as their tribes inhabited the Magic Valley area, and these grounds could very well be located in the spots that they want to blast so that they can put up these wind turbines. Please recognize that their voices need to be heard, and honored, therefore choose the no build option.	Tribal consultation is a requirement of Section 106 of the NHPA. The BLM continues to consult with Tribal Nations, including the Shoshone-Bannock. A description of consultation and a list of consulting parties may be found in EIS Appendix 10. Also see responses to comments 11808-3 (see in Table A-3g, Cultural Resources and Native American Concerns), 11860-3 (see in Table A-3g, Cultural Resources and Native American Concerns), and 11869-20 (see in Table A-3g, Cultural Resources and Native American Concerns).
11808-3	Jon Ochi	In 1868, the Treaty of Fort Bridger stated: ARTICLE 4. The Indians herein named agree, when the agency house and other buildings shall be constructed on their reservations named, they will make said reservations their permanent home, and they will make no permanent settlement elsewhere; but they shall have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts. Subtribes.com Peace has continued to subsists among the whites and Indians. That component of the treaty has been fulfilled. However, a violation of the treaty may occur if the LRWP is allowed to develop. If wildlife Is reduced or obliterated by the changes to the ecosystem such that animals cannot or will not survive or migrate through the area because of visual and/or audio impacts or loss of food sources, then the treaty will have been subtly breached. Yes, hunting by the Tribe is allowed, but there may be reduced amount of game to hunt. It will not be the first time that a treaty has been subtly violated. The Shoshoni-Bannock Tribes were "guaranteed the rights to hunt on unoccupied land of the United States so long as game may be found thereon." The issue is: Does granting development privileges to a private equity corporation during which hunting is compromised or destroyed constitute breach of treaty obligations? Having experienced breaching of rights of US citizenship, my father and his friends in California knew what it was to like to lose property not by direct taking, but by illegally incarcerating people such that they could not be present to pay their bills causing loss of their possessions and property. t The federal policy reads as follows: The requirements of EO 12898 to "make achieving environmental justice part of [the BLM"s] mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations"" DEIS, p.1-2	See response to comment 11860-3 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the effects of the project on game populations as may affect hunting under Tribal treaty rights. Specifically in regard to EO 12988, the Environmental Justice Communities section of the EIS (Section 3.6.1) further addresses the impacts of the project on tribal communities. The BLM will continue to work with Tribes regarding their resource concerns, including as relates to treaty rights and environmental justice.

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11860-1	Shauna Robinson	• The lack of knowledge about a large percentage of the surface artifacts and features contained within Alternative B's fourteen square miles (9,114 acres) that will be vulnerable to "ground disturbance" is not acceptable. With only 17% of the project area surveyed (3-164), the cultural resources on 83% of the project land remain unknown and vulnerable to potential damage or destruction from the disturbance of the ground, blasting, traffic, dust, and noise. • The 199 previously documented cultural resources that are found within the planned corridors are "subject to physical impacts if not avoided by the project" (3-171). However, given that surveys have only covered 17% of the project area in an environment that has been used culturally for thousands of years, impacts would logically affect far more than 199 documented cultural resources, with some estimates of the presence of cultural resources being in the tens of thousands (3-177). The BLM's plan for a "phased identification, evaluation, and resolution of adverse effects…" (Programmatic Agreement, #10) is not adequate in planning for the known and/or the unknown. The BLM and the Proponent should know up-front the complete picture of cultural resources, to allow for responsible planning for the preservation of artifacts, pre- contact or historic. Additionally, number 1 in the "Qualifications and Standards" of the "Stipulations" document states, "The BLM shall ensure that appropriate cultural resource inventories/surveys…. are completed." A phased survey is not "appropriate" for such a critically important cultural area.	See response to comments 11198-2, 11557-4, 12338-9, and 11585-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
11860-2	Shauna Robinson	DEIS 3-149 states the "BLM SFO acknowledges all resource concerns expressed by the Tribes and will consider each concern as appropriate" based on the policies stated in various public laws, among them ARPA, the Archaeological Resources Protection Act, Public Law 96-95: 16. U.S.C. 470aa-mm. Under 16 U.S.C., Section 2, (a) "The Congress finds that--- (1) archaeological resources on public lands and Indian lands are an accessible and irreplaceable part of the Nation's heritage." It goes on to state "(b) The purpose of this chapter is to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites which are on public lands and Indian lands," thus maintaining the valuable information such archaeological sites have in telling an area's heritage story. Also, the 1966 National Historic Preservation Act offers additional purpose for the preservation of artifacts in Section 1, b, 4, stating "the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans." For a massive wind project to potentially "disturb" 9,114 acres of public land is not adequate.	The BLM has fully disclosed in the EIS (see Section 3.5) that the project is anticipated to have unavoidable visual adverse effects on historic properties due to the scale and nature of project elements The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all historic properties in the area of potential effect would be adversely affected. At historic properties that would be adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties, as would be further addressed under the PA for the project (see EIS Appendix 8) in compliance with Section 106 of the NHPA. Treatment of archaeological resources on BLM lands will be in accordance with ARPA. Under the PA, the project areas that would be disturbed by construction or other activities would receive further cultural resources identification efforts to refine the avoidance, minimization, or mitigation of adverse effects on historic properties. Under Section 106, historic properties on and off of BLM public land would be identified, effects assessed, and avoidance, minimization, and mitigation of adverse effects (physical through direct disturbance and non-physical as may result from visual or auditory impacts) would proceed pursuant to the PA for the project (see EIS Appendix 8).
11860-3	Shauna Robinson	Sufficient protection of Tribal Treaty Rights is undermined by a wind project that would destroy the vital landscapes and natural resources essential to wildlife. The provisions of the Fort Bridger Treaty of 1868 (3-153) granted the Shoshone-Bannock Tribes with hunting rights "off the reservation on 'unoccupied lands of the United States so long as game may be found theron' (Shoshone-Bannock Tribes 2021)". Shoshone-Bannock Tribal member, Chad Colter, voiced his concern about the Treaty Rights in the BLM RAC Subcommittee meeting on 22 September 2022, stating that those rights are being overlooked and that more emphasis is needed to maintain Tribal hunting and fishing rights on land that is "Tribal homeland.". He cited these traditional uses through the Fort Bridger Treaty 1868, and added how the Lava Ridge project would "whittle away" the land and resources. The BLM needs to protect the Treaty Rights and the resources utilized by the Tribes for hunting, gathering, and spiritual practices that depend on birds, other forms of wildlife, wild plants, and dark skies. It is inadequate for the BLM to allow the proposed wind turbine corridors that intrude on the migration routes of mule deer, elk, and pronghorn. They should be eliminated or moved outside migration routes to help preserve and strengthen Tribal Treaty Rights and the setting and feeling of the "Tribal homeland." (3-197)	In accordance with NEPA, the EIS fully considers impacts to natural and cultural resources from proposed long-term (up to 36-year plus the time it takes to reach successful reclamation following decommissioning) occupation of lands by the project, including such plant, animal, water, and mineral resources that may be associated with tribal rights or interests under the Fort Bridger Treaty of 1868 (see the referrals within Sections 3.5.4 and 3.5.5 to the analyses in Section 3.15 [Vegetation], Section 3.17 [Water and Wetland Resources], and Section 3.18 [Wildlife] for how these resource patterns or availability would be changed by the project). Dark skies are further addressed in Section 3.16.2 (Visual Resources, Night Skies) and, as cited in that section, *An Assessment of the Impact of Lighting at the Proposed project on the Night Skies of the Craters of the Moon National Monument and Preserve and the Minidoka National Historical Site*, which is available on the BLM website for the project (Dark Sky Partners, LLC 2022). EIS Section 3.5.1 (Native American Resources) connects these resources to tribal contexts, including as relates to treaties between the U.S. and Tribal Nations. Potential impacts of the project on mule deer and pronghorn are described in EIS Section 3.18.2 (Big Game Habitats and Populations). Elk are discussed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-62. The BLM identified an alternative to address concerns regarding impacts of the project on big game migration corridors, which is described in final EIS Section 2.8 (Preferred Alternative) and is analyzed in final EIS Section 3.18.2.2 (Big Game Habitats and Populations, Impacts). See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
11860-4	Shauna Robinson	Protections of Wilson Butte Cave, a National Register site, are inadequate because of the planned siting of wind turbine corridors about a mile to the north. Wilson Butte Cave is one of the most significant archaeological sites in North America, with a history that documents Native American habitation for almost 15,000 years. Studies by Dr. Ruth Gruhn in excavations she conducted in the 1960s and 1980s, tell a story of a land that evolved from a cooler grassland dotted with ancient lakes to the desert it is today. Discoveries of bones from camel, early horse, bison, pronghorn, along with domestic and hunting tools, reveal how the indigenous people adapted to the changes of food sources and environments over the thousands of years. An important part of the site's historic integrity and setting are the viewscapes. Studies on the visual change from planned turbine sitings indicate the view would undergo major changes, no matter the alternative plan implemented (3-416). The presence of wind turbines would intrude on the unique setting, feeling, and sacred qualities of Wilson Butte Cave and, potentially, on the Wilson Butte itself, which is about a half mile to the east. Additionally, cumulative effects from other nearby energy projects also must be considered regarding impacts on the viewscapes (3-421).	See EIS Sections 3.5 (Cultural Resources) and 3.16 (Visual Resources for the BLM's disclosure of potential visual resources impacts and associated cumulative impacts from the project at the Wilson Butte Cave historic property and its surroundings. EIS Figure 3.5-3 illustrates the simulated condition for Alternatives B and E (with 6-MW wind turbines) as viewed 2.5 miles to the east from KOP 10 (Wilson Butte Cave), from the surface at Wilson Butte Cave; however, the nearest turbine siting corridor would be 1 mile from Wilson Butte Cave. For to-scale simulations and viewing information for visual resources KOPs, including for the BLM's Preferred Alternative from KOP 10, please refer to EIS Appendix 5 (Select Visual Resources Simulations) or the project visual resources technical report (SWCA 2024), available on the BLM project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/510). The BLM is analyzing alternatives in the EIS that would maintain distance between project development and Wilson Butte Cave. Non-physical impacts (visual and audible impacts) to the Wilson Butte Cave site as a historic property are analyzed for all alternatives under EIS Section 3.5) and these analyses found that adverse effects could result to the Wilson Butte Cave historic property, to varying extents, under any action alternatives. Specifically, the integrity of setting and feeling of this historic property could be adversely affected; the project would avoid physical impacts to this historic property. The BLM is completing its finding of effects to historic properties under NHPA Section 106. Cumulative effects

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			are addressed under the EIS, as at Section 3.5 (Cultural Resources) and for historic properties pursuant to the project PA (see EIS Appendix 8).
11860-8	Shauna Robinson	Additionally, the former community of Owinza at the railroad siding east of Dietrich, used to play an important role for sheep ranchers in the latter part of the 19th century and the 20th century. Sheep were often unloaded / loaded at Owinza to / from pasture areas. Lava Ridge would make this railroad location into a staging area for construction supplies and wind project operations. The early 20th century footprint and the surface evidence of the Owinza community and nearby homesteads will be severely damaged with the construction traffic and activities.	The Owinza Railroad Siding and Townsite is a previously documented historic property, identified in Appendix 6 of EIS Appendix 8 at 10LN0620 and indicated in state and BLM records to be eligible for the NRHP under Criteria A and D for its significance related to events in history and for its further research potential (as an archaeological site). EIS Section 3.5 (Cultural Resources) analyzes the effects of the project at historic properties within the area of potential effects for the project where physical (i.e., ground disturbance) and non-physical (i.e., visual or noise impacts) could occur. The analyses considers all project activities and areas where impacts could result to historic properties, including staging areas. The BLM would require measures to avoid, minimize, or mitigate adverse effects to historic properties, including at Owinza, as conditions of its approval of the project, should it decide to approve the project. In addition to conditions pursuant to the EIS review, the BLM is preparing a PA (see EIS Appendix 8) that would set measures for avoidance, minimization, and mitigation of adverse effects to historic properties, including Owinza, prior to any BLM approval of the project to proceed. The PA also includes unanticipated discovery planning measures to address post-review discoveries of and impacts to historic properties, should they inadvertently occur despite best planning efforts.
11869-20	Raul Labrador, Josh Turner; Idaho Attorney General's Office	Thus, the draft EIS concludes that hunting opportunities" will be significantly "diminished" due to the Project's "population-level" effects on mule deer and pronghorn. DEIS at EX-xxi; id. at 3-479–480. These "population-level effects" would be "irreversible," DEIS at 3-486, and would extend far beyond BLM land. Such effects will particularly burden tribal reserved rights in ways that will likely overtax Idaho lands and resources. Diminished wildlife habitats and tribal hunting grounds necessarily impact Idaho's right to manage its wildlife resources.	Potential impacts of the project on mule deer and pronghorn are described in EIS Section 3.18.2 (Big Game Habitats and Populations), based on the most recent scientific literature at the time of EIS preparation. The BLM is working closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as is possible. In accordance with NEPA, the EIS fully considers impacts to natural and cultural resources from proposed long-term (up to 36-year plus the time it takes to reach successful reclamation following decommissioning) occupation of lands by the project, including such plant, animal, water, and mineral resources that may be associated with tribal rights or interests under the Fort Bridger Treaty of 1868. EIS Section 3.5.1 (Native American Resources) connects these resources to tribal contexts, including as relates to treaties between the U.S. and Tribal Nations.
11886-3	Sandra Eto	Non-physical Area of Potential Effect (APE) The description of treatment of non-physical APE or non-physical impacts in the DEIS is confusing and appears to not be consistent with, and is confusing when compared to, the same topic in the Draft Programmatic Agreement (PA). • The DEIS states (@ p. 3-173), "Cultural resources that are eligible only for their data potential (i.e., Criterion D) without such aboveground features or ties4 would not be considered susceptible to non-physical effects and not subject to further analysis for visual or auditory effects. • The Draft PA, Appendix 8 of the DEIS, states, under Stipulations, E. Assessment of Effect, 7.: As identified through consultation and agreement with SHPO, properties eligible only under Criterion D will be documented but not evaluated further for visual effects. (p. 13). The first explanation in the DEIS makes it clear that resources eligible for data potential that have aboveground features or ties would be considered susceptible to non-physical effects. The difference in these two explanations could lead some to interpret the wording in the Draft PA to mean any property eligible for listing (or listed) only under Criterion D of the National Register Bulletin 38 will not be evaluated further for visual effects in determining impact or mitigation.	The EIS language is changed to read that cultural resources that are eligible only for their data potential (i.e., Criterion D), without such aboveground features or ties (that would make them eligible for the NRHP under Criterion A, B, or C), would not be considered susceptible to non-physical effects and would not be subject to further analysis for visual or auditory effects.
11915-1	Kim Peyman	I would like to start by citing a few points from the ethic code of the BLM: Treat rock art, historic structures, and archaeological features with respect. Touching, chalking, or making rubbings or latex molds cause damage to rock art, gravestones, and fossil trackways. (May I assume that blasting holes would fit here too?) Take photographs or make a sketch instead. Report looting and vandalism to a BLM ranger or other local authority. I would like to file a preemptive damage report now. I would think that blasting holes into the earth near Wilson Butte Cave could potentially cause damage to its structure. Suppose that there is an unknown lava tube running under the cave which collapses due to explosive influences, thereby causing damage/collapse of Wilson Butte Cave? Our entire region is riddled with lava tubes. This cave is on the U.S. National Register of Historic Places as an archaeological site. Executive Order 11593, "Protection and Enhancement of the Cultural Environment," asserted that "the Federal Government shall provide leadership in preserving, restoring and maintaining the historical and cultural environment of the Nation."1 A potential collapse of Wilson Butte Cave is an unacceptable risk to take. The Nation has said we should preserve and treasure it. A 1959 excavation of Wilson Butte Cave was funded by Dr. J.O. Brew, Director of the Peabody Museum of Harvard University, and led by Ms. Ruth Gruhn, who was working on her doctoral dissertation. The Idaho State College Museum provided logistical support and guidance throughout this investigation.1 The excavation was conducted over a period of one year and the cave was found to include five layers of strata down to the bedrock. Radiocarbon samples were taken from these various strata and six conclusive dates were secured that ranged from 13,050 B.C. to 1525 A.D. The oldest stratum layer excavated yielded the bones of two extinct forms of camel, and one of a horse. Other layers yielded the bones of extinct camels, horses, possibly a sloth, the modern bison, and deer or antelope (undetermined). Various tools of stone and bone, along with stone projectiles, were uncovered in all stratum layers except the oldest one. Pottery was also discovered that could be directly associated with the Shoshonean culture. Some of the other cultural occupations of Wilson Butte Cave were identified as the Pre-Columbian Fremont People through the tools and projectiles that were found. The discovery of these artifacts provided unequivocal proof that Wilson Butte Cave was definitely occupied by humans for at least 12,000 years off and on due to climatic changes in the area. Our cave is one of only a handful of sites in North America that can offer indisputable proof of prehistoric occupation by humans. In fact, our cave held the oldest radiocarbon-dated evidence of human presence on the Snake River Plain, and is considered among the oldest evidence of mankind's existence in North America. This alone should disqualify the use of our BLM land for the wind farm	The BLM is committed to avoiding, minimizing, or mitigating adverse effects to important cultural resources, including caves and lava tubes that can be of tribal and archaeological significance, as at the Wilson Butte Cave historic property. The BLM is analyzing alternatives in the EIS that would maintain distance between project development, including blasting, and caves and buttes of cultural significance to Tribes and others (see EIS Section 3.5). Methods to avoid impacting resources during blasting are outlined in EIS Appendix 4, Table App4-2i. Per applicant-committed measure 86, a blasting geologist will be consulted prior to any blasting to avoid potential rockfall (rockslide/landslides). The PA for the project (see EIS Appendix 8) would further set avoidance, minimization, and mitigation measures for adverse effects from the project to historic properties, including Wilson Butte Cave. The PA includes unanticipated discovery planning measures to address post-review discoveries of and impacts to historic properties, should they inadvertently occur despite best planning efforts. Also, development of the project would not eliminate public access the BLM land within the project area, such as Wilson Butte.

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		project, not to mention the National Historical Site recognition. We may not even be allowed to visit this peaceful place if the wind farm has towers there. What a loss this would be for us, as well as future generations.	
11949-1	Victor Yamada	Cultural Resources – The visual changes would significantly impact the setting, feeling, and association of Minidoka National Historic Site. The Site tells the stories of the forced incarceration of Japanese Americans and ensures they are honored and preserved for future generations. It is integral to the identify of the Japanese Americans taken from their homes, separated from their families, and imprisoned in a purposely isolated environment thousands of miles from home. Appendix 8, Cultural Resources Program Assessment, does not address these impacts.	The BLM is considering effects on cultural resources from the project undertaking through Section 106 consultation in addition to through impact analysis under the EIS. The PA is being prepared by the BLM in consultation with consulting parties under NHPA Section 106 and with the opportunity for public comment, including as presented in EIS Appendix 8. The BLM has been consulting with the NPS, the Japanese American community, and others on potential project impacts to Minidoka NHS pursuant to NHPA Section 106 and to inform EIS preparation. The BLM's EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community knowledge and concerns identified through project scoping, Section 106 consultation with consulting parties (per 36 CFR 800), the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. The NPS, organizations and individuals representative of the Japanese American parties, and other qualified parties under the NHPA Section 106 process (36 CFR 800.2) have joined the NHPA Section 106 consultation process as consulting parties. BLM-recognized consulting parties have opportunities to review, consult, and contribute their knowledge on PA documents such as reports and plans, including the HPMP and HPTPs that would detail the address of historic property management and treatment pursuant to the PA. This includes consultation on the avoidance, minimization, and mitigation of adverse effects to historic properties, including Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
11965-1	Matt Bridges	According to the Lava Ridge Wind Project DEIS, 3.5.2 Native American Resources, Native American resource concerns for the project in the NHPA Section 106 review pertain especially to a resource's integrity of setting, feeling, or association from a Tribal perspective, even if the project is not directly visible or audible from that resource of concern. Impacts to the NRHP-listed Wilson Butte Cave (10JE6) have specifically been identified by Native American Tribes and other consulting parties to be of heightened concern. Although a 1-mile setback was incorporated into the project design to avoid physical impacts to this significant cultural resource (MVE 2022:C-3.2.2), non-physical visual and auditory impacts would not be fully avoidable by the project. To build a wind project near this facility and over the sacred grounds of Native American Tribes, thus degrading, obscuring, and obliterating cultural resources, appears to be a cover up of the atrocities of the Government meted out on her people. Burying the past and building a project will restrict the citizenry from learning about these atrocities, and enjoying the learning experience of visiting our public lands. The BLM must meet their mission statement to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.	The project would avoid direct physical effects at the Wilson Butte Cave historic property but would result in visual effects as stated in the EIS. As described in Section 3.5 (Cultural Resources) analyses, the BLM consideration of alternatives providing increased distances for project turbines from those historic properties that would be adversely affected by visual impacts would be effective in reducing visual adverse effects, including for the Wilson Butte Cave. Under the BLM's Preferred Alternative, the nearest project turbine siting corridor would be 4.4 miles from Wilson Butte Cave (KOP 10), as compared to 0.9 mile under the Proposed Action. For to-scale simulations and viewing information for visual resources KOPs, including for the BLM's Preferred Alternative from KOP 10, please refer to EIS Appendix 5 (Select Visual Resources Simulations) or the project visual resources technical report (SWCA 2024), available on the BLM project website [https://eplanning.blm.gov/eplanning-ui/project/2013782/510]). The avoidance, minimization, and mitigation of adverse effects to historic properties such as Wilson Butte Cave are further being addressed by the BLM through a PA and Historic Properties Management Plan as stated in the EIS, in consultation with Tribal Nations and consulting parties under NHPA Section 106. Mitigation efforts for adverse effects are intended to provide public value and may educate people on history, including the specific history of Native Americans in the project area. EIS Section 3.6.1 (Environmental Justice Communities) further considers the impacts of the project on Native American communities.
11978-29	Magic Valley Energy, LLC	Section 3.5.1 – Cultural Resources Analytical Framework 25. The DEIS states that "The auditory component of the non-physical APE, where noise from project operation could be perceptible, would extend up to approximately 2.2 miles from the turbine siting corridors and up to 0.5 mile from the 500-kV transmission line corridors (see Figure 3.5-2). Once the turbines and transmission lines are built, operational noise could persist throughout the 30- year project operation (see Section 3.6 regarding Noise; SWCA 2022a)." a. MVE Comment: The DEIS statement that "audible components extend up to approximately 2.2 miles from the turbine siting corridors and up to 0.5 mile from the 500-kV transmission line corridors" is not found in the SWCA 2022a reference. A suggested edit would be to reference this section in the SWCA 2022 Noise Tech R"port: "Estimated 1-hour Leq noise levels from the operation and maintenance traffic was estimated to be no more than 64.4 dBA at a distance of 5" feet."	Noise modeling estimated that turbine operational noise levels would be meaningly perceptible up to 2.2 miles (SWCA 2022: Figure D-2).
11985-1	Val Tollefson; Bainbridge Island Japanese American Exclusion Memorial Association	Alternative A is the No Action alternative. The No Action would preserve Minidoka as the sacred site for Japanese Americans that it is today. The adoption of any alternative other than the No Action would ignore the essence that makes Minidoka such an important monument. The creation of Minidoka NHS was part of this restorative process. With the Lava Ridge project on its docket, the BLM appears ready to administratively nullify that apology. Adoption of any alternative other than Alternative A would be wholly incompatible with the environmental, archaeological and cultural characteristics of the site. These characteristics have been carefully cataloged in the draft EIS, but the BLM-favored alternatives suggest that the BLM is prepared to ignore those characteristics. This must not happen. One standing on the ground at Minidoka, struck by the immensity of the sky, the distant horizon, and the silence has a similar visceral reaction to the site. The open space surrounding Minidoka is an essential element of the site. It is the very emptiness of the land to the distant horizon that conveys a sense of the enormity of the wrong perpetrated on these Americans, and the desolation that defined their lives for the war years;" "The remote setting of the Minidoka NHS now under threat is an irreplaceable part of the experience of each visit. While the need for renewable energy is undeniably important, the need for this project on this particular site is not. The BLM and other federal agencies control vast tracts of land in the western U.S. Picking this site for the project will perpetrate yet another injustice under cover of government authority. Find another site.	The current EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking under applicable laws (such as NEPA and NHPA) to protect the historic properties associated with Minidoka NHS. EIS Appendix 4 (Mitigation) specifically includes a Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, FLPMA, and other laws, regulations, and federal requirements, in advance of the project decision. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA (see EIS Appendix 8), completing the Section 106 process in consultation with consulting parties. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA, is signed, and a project ROD is released. The BLM decision on the project will be stated in the ROD.

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11991-2	Julie Abo	As a consulting party who has been participating in the Section 106 process, I do not consent to the Lava Ridge Project. I do not consent to the Section 106 current status nor the Programmatic Agreement. I have read the Draft Environmental Impact Statement and I support Alternative A: No Action for the reasons that follow. Cultural Competency and Non-physical Impacts I was shocked and angered when I found out about the Notice of Intent for the project well after it was posted. It was clear there was not an earnest and authentic effort to engage the Japanese American Minidoka community in the earliest stages of this project. So many people of the Minidoka community had no idea what was happening after the Notice of Intent was posted on 8-20-2021. I was devastated. My family was devastated. Community members were devastated. At least the BLM heard our voices amongst the Southern Idaho community and granted an extension on the comments deadline. Additionally, I find the transgression of the Tribes' rights as granted by treaty some of the most compelling reasons as to why this project should not move forward. (page 3-153) In the DEIS, Indigenous peoples and Japanese Americans should not be called "tourists and recreationists." This shows a lack of basic cultural competency on the part of the party who prepared the DEIS. It is disappointing to see that the BLM (SWCA) only has these three categories of people who frequent the parks. Japanese and Native Americans do not fit into these categories, another sign of a lack of cultural competency. (See page 3-403)	The BLM's scoping and consultation efforts are summarized in EIS Appendix 10, under Consultation and Coordination, and in the scoping report prepared for the project and posted on the BLM's project website, as cited (as SWCA 2021) in the Appendix 10 EIS Literature Cited section (for EIS Chapters 1 and 2). The DOI Office of Collaborative Action and Dispute Resolution further conducted outreach efforts to the Japanese American community in Idaho and throughout the United States to identify and consult on community interests and concerns and receive input on the project and produced a summary report on these efforts, as cited in the EIS. The BLM continues Government-to-Government consultation with Tribal Nations on the project. See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding meaningful engagement with environmental justice communities. Also see response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American communities and Japanese and Alaska Natives.
11991-12	Julie Abo	Constructing and running a concrete batch plant would have a major impact on the surface ground and under the ground. The plan calls for three batch plants for all of the alternatives. Is it feasible that these batch plants could be constructed without disturbing the cultural resources, particularly for the Native American tribes? See DEIS: "Alternatives C and E: 3 batch plants" page 2-7 and page ES xvii Cultural Resources."	All project activity areas are considered in the EIS analyses, including analyses of impacts to cultural resources at EIS Section 3.5. The use of concrete batch plants is accounted for, in particular, as part of the consideration of physical impacts analyses for the project. Within the physical impact analyses for cultural resources, Native American resources are specifically included. The BLM seeks to avoid, minimize, and mitigate impacts to cultural resources, in that order of action, and would further stipulate measures for avoiding, minimizing, and mitigating adverse effects under NHPA Section 106 in the project PA (see EIS Appendix 8). To additionally support these avoidance, minimization, and mitigation efforts, Native American Tribes participating in Government-to-Government consultation for the project will be invited and encouraged to assist with cultural resources survey and monitoring of ground disturbing activities within the vicinity of resource components to which they attach religious or cultural significance.
12130-4	Brenda Pace	I am appreciative of the BLM's ongoing support of the interactive consultation that is at the heart of the NHPA Section 106 review process and am confident that adverse impacts to cultural resources in the Lava Ridge Wind project area will be avoided, minimized, and mitigated according to well-established standards, guidelines, and procedures. In reality, this will be no small task given the sensitive nature of cultural resources like the Minidoka National Historic Site, wide-ranging concerns of tribal communities, the presence of National Register properties like Wilson Butte Cave inside the project boundaries, and the large extent of the Lava Ridge Wind project footprint on the ground in in the visual realm. Section 3.5 of the DEIS and the draft Programmatic Agreement presented in DEIS Appendix 8 include information and stipulations that provide assurance that the preconstruction surveys, assessments, and mitigation that will be conducted prior to construction will be thorough. However, some of the information I believe is essential to evaluate the potential impact of the Lava Ridge Wind project, which will likely be part of the Historic Properties Management Plan, has not been included in the DEIS and this absence does prevent a full and timely review of impacts relative to the public comment period for the DEIS. I have a few examples: • The DEIS and PA do not include any definitions for basic cultural resource types, in particular the distinctions between "sites" and "isolates," and the National Register eligibility consequences of these basic divisions. These must be included in the final HPMP and PA.	Cultural resources are defined for the purposes of analysis under NEPA at the very beginning of EIS Section 3.5 (Cultural Resources). The range of cultural resources analyzed are summarized there and the variety of cultural resources documented in the area of potential effects is further listed in Appendix 6 of EIS Appendix 8, as well as having additional context provided in the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. The distinction of cultural resource site and cultural resource isolate is not necessary in the EIS analysis; however, this distinction would be included as applicable in the cultural resource documents and reports produced pursuant to the PA under NHPA Section 106.
12130-5	Brenda Pace	• It is also difficult to understand how National Register eligibility will be assessed for cultural resources in the project area in the absence of a basic research design and corresponding context statements for the cultural resources expected to occur. These important components must also be included in the final HPMP and PA.	As stated in the introduction of EIS Section 3.5 (Cultural Resources), NRHP eligibility is assessed in accordance with criteria of eligibility at 36 CFR 60.4. The BLM is further identifying, evaluating NRHP eligibility, and considering effects on cultural resources from the project undertaking through Section 106 consultation in addition to through impact analysis under the EIS. These efforts will be directed by the PA (see EIS Appendix 8) that the BLM is preparing in consultation with consulting parties, and would be further detailed as relevant in the HPMP and HPTPs that the address of historic property management and treatment pursuant to the PA. However, as stated in the EIS Introduction section, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as in development of historic contexts. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10.
12130-6	Brenda Pace	DEIS Section 3.5.5.1 presents a very simplified prediction for a density of three cultural resource sites per square mile in the unsurveyed portion of the Lava Ridge project area based on previous surveys completed in approximately 17% of the project area. This simple construct does provide a coarse tool to compare the potential impacts of the action alternatives in the DEIS, but has little use otherwise. If such predictions are to be of any use in the HPMP and PA, they must be based on a more detailed understanding of cultural resource distribution on the Snake River Plain, highlighting for example, the high archaeological sensitivity of playas (Henrikson et al. 1998). I realize that cultural resource surveys are delayed until a Record of Decision is reached in the NEPA process and a ROW is issued. One of the first steps in evaluating sensitive areas for avoidance in the Lava Ridge project area should be a cultural resource evaluation of the 46 playas that have been identified there.	See response to comment 12398-6 (see in Table A-3g, Cultural Resources and Native American Concerns). Additionally, all archaeologically sensitive locations within the field survey areas determined under the PA for the project would be further inventoried for cultural resources, including dry playa locations within those survey areas. However, it is not anticipated that all playas in the vicinity would be within the field survey areas or require evaluation for cultural resources where project impacts would not potentially occur.

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12130-7	Brenda Pace	DEIS Section 3.5.5.2 and the PA include discussions of avoidance of physical impacts at identified cultural resources sites, including possible setbacks and buffers between sensitive resources and ground disturbing activities. These important avoidance measures must be included in the final HPMP and PA.	The EIS is contemplating action alternatives that would locate project turbines outside of sensitive cultural resources, including Minidoka NHS. Avoidance, minimization, and mitigation measures for adverse effects that would potentially result at these historic properties, including Minidoka NHS are contemplated in the EIS, such as at Section 3.5.5.4, and would be further pursued by the BLM under a PA completing the NHPA Section 106 process and associated HPMP and HPTPs, in consultation with consulting parties.
12159-8	Marie Matsuno, Dan Sakura	Indigenous Knowledge. The Biden Administration has issued guidance to federal agencies to consult with Indigenous people and incorporate Indigenous Knowledge in federal land management decisions: “consultation and collaboration with Tribal Nations and Indigenous Peoples is critical to ensuring that Indigenous Knowledge is considered and applied in a manner that respects Tribal sovereignty and achieves mutually beneficial outcomes for Tribal and Indigenous communities.” 8 Unfortunately, the BLM did not actively consult with Japanese Alaskans during the DEIS process. While the forced relocation of Japanese Alaskans has led to disconnections with traditional knowledge, I continue to have Indigenous Knowledge as it relates to our wrongful incarceration and efforts to heal the emotional scars.	The BLM is considering effects on cultural resources from the project undertaking through Section 106 consultation in addition to through impact analysis under the EIS. The PA is being prepared by the BLM in consultation with consulting parties under NHPA Section 106 and with the opportunity for public comment, including as presented in EIS Appendix 8. The BLM has identified Minidoka NHS as a historic property and has been consulting with the NPS, the Japanese American community, and others on potential project impacts to this historic property pursuant to NHPA Section 106 and to inform EIS preparation. The BLM’s EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community knowledge and concerns identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM’s Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. The BLM has accorded these consultation efforts with all due diligence and good faith. The BLM understands that Alaska Natives, including Alaska Native spouses and mixed Alaska Native and Nikkei children, were among the Nikkei population incarcerated at Minidoka WRC. The NPS, organizations and individuals representative of the Minidoka-connected community (including those with direct ties to Alaska), and other qualified parties under the NHPA Section 106 process (36 CFR 800.2) have joined the NHPA Section 106 consultation process as consulting parties. BLM-recognized consulting parties have opportunities to review, consult, and contribute their knowledge on PA documents such as reports and plans, including the HPMP and HPTPs that would detail the address of historic property management and treatment pursuant to the PA. This includes consultation on the avoidance, minimization, and mitigation of adverse effects to historic properties, including Minidoka NHS. The BLM is consulting with Native American Tribes with ancestral ties to the project area (see EIS Appendix 10, Section 106 Consultation and Government-to-Government Tribal Consultation). Alaska Native Tribes were not directly among interested parties or stakeholders identified during initial project scoping or through the NHPA Section 106 consultation process. Also see response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding the DOI’s trust responsibilities, specific Treaties that relate to federally recognized Tribes with ancestral ties to the project area, and the EIS’ full consideration of impacts to resources that may be associated with tribal rights or interests.
12159-9	Marie Matsuno, Dan Sakura	Inadequate Description of Authorities Relating to Sacred Sites. The BLM’s DEIS does not adequately describe the list of authorities relating to Tribal Sacred sites. For example, the DEIS does not list Executive Order 13007 – Indian Sacred Site which requires federal agencies to: “avoid adversely affecting the physical integrity of such sacred sites.” Pilgrimages to Minidoka and other incarceration sites are associated with a unique form of religious beliefs held by survivors and descendants: “Rituals play an important role in the preservation of memory as they involve the active bodily participation of all those who are present. Japanese American civil religion similarly involves rituals that bring a community together to remember the past for the sake of the present. These modern-day rituals, such as the annual pilgrimage to Manzanar that opens this article (and the Tule Lake Pilgrimage, which began in 1974), initially brought together Japanese Americans, mainly Sansei, who often lived in the shadow of their parents’ and grandparents’ silence, and helped them begin to recover a shattered past. As Joanne Doi explains: ‘These [events] were attempts to search out the truth of the history bound up in the silence of the Nisei and the classroom. The magnitude of the silence of the Nisei helped form the voice of the Sansei; the Nisei’s absence of outward emotional response mobilized the Sansei to begin to speak out.’ In a significant sense, the annual pilgrimages and Days of Remembrance prepared the way for more intense struggles (the fight for redress) and extended projects (the Japanese American National Museum).	The EIS references EO 13007 in multiple places in EIS Section 3.5 (Cultural Resources), including in the introduction of that section and also specifically in Section 3.5.1 (Native American Resources). EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) further considers the importance of Minidoka NHS and the surrounding area to the Minidoka-connected community, including survivors of incarceration and their descendants.
12177-1	Carol A. Overland	SITING WIND TURBINE NEAR HISTORIC SITE – NEEDS 6.5 MILE SETBACK The good news is that there is experience in siting the Big Bend Wind Project near an historic site in Minnesota, the settlement agreement1, ALJ’s Recommendation, and Commission Order offers suggestions on impacts, avoidance, and mitigation2 See attached Exhibits A, B, B-1, C. Discussion of impacts on the Mindoka National Historical Site are similar to those raised during the consideration of the Big Bend Wind Project3 in Minnesota near Pipestone National Monument and Jeffers Petrogylphs Historic Site. See attached Exhibit A, Planned Minnesota wind farm to be moved farther from Jeffers Petroglyphs site. State law requires consultation with the state Historic Preservation Office, and federal law requires consultation with tribal governments. Many tribal and local officials and residents raised questions about the impact of the wind project on the Jeffers Petroglyphs Historic Site, a site sacred to area native tribes. A look of issues raised and how addressed could/would help inform the record in this docket. The Jeffers Historical Site settlement specifics begin on page 58 of the ALJ’s recommendation. The bottom line is that turbines will now have at least a 6.5 mile set back from the Jeffers Historical Site. Additional historic resources were addressed in the proceeding, and recommendation addresses these sites beginning on p. 62 of the Recommendation. Exhibit C. The issues raised of impacts on the historical site and the settlement reached received broad attention4 and provides guidance on Lava Ridge siting. The essential part of reaching a mutually agreeable/not-all-happy agreement was participation of the parties with an interest. The BLM has experience with	At the advisement of the BLM, MVE revised their Proposed Action to exclude development of project structures at Minidoka WRC and Wilson Butte Cave, creating a minimum of 1-mile setback from the nearest project siting corridor to avoid physical impacts at Wilson Butte Cave area and at Minidoka NHS facilities. However, the BLM is considering other action alternatives—including the BLM Preferred Alternative—that would yet further increase the distance between the nearest project turbines and Wilson Butte Cave and Minidoka NHS. Under Alternatives C and D, the nearest project siting corridor (where turbines could be placed) would be 2.5 miles from Wilson Butte Cave and 5.5 miles from the Minidoka NHS Visitors Center. Under Alternative E, the nearest project siting corridor would be 3 miles from Wilson Butte Cave and 8.5 miles from the Minidoka NHS Visitors Center. Under the BLM’s Preferred Alternative, the nearest project siting corridor would be 4.4 miles from Wilson Butte Cave and 8.9 miles from the Minidoka NHS Visitors Center. Under all action alternatives, the majority of turbines would necessarily be farther from these historic properties than the nearest project siting corridor. The BLM’s Preferred Alternative would have fewer turbines than any other action alterative (3 MW or up to 5 MW), as well as potentially shorter turbines than other action alternatives, reaching no greater than 600 feet tall at turbine tip with use of 5-MW turbines (in contrast to other action alternatives that could use up to 6-MW turbines reaching 740 feet in height at blade tip). The EIS sufficiently analyzes the visual impacts of the 3-MW to 6-MW turbines that would be constructed for the current project, in consideration of the project’s landscape setting and features, as related to cultural resources (EIS Section 3.5) and visual resources (EIS Section 3.16).

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		consultation, and in this case, what's needed is consultation with the Dept. of Interior/Historic Preservtion and all the parties weighing in.	Regardless, the BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA (see EIS Appendix 8) is signed, and a project ROD is released. The BLM decision on the project will be stated in the ROD. Section 106 consultation (including with Native American Tribal Nations, NPS, Minidoka-connected community [inclusive of those with direct ties to Alaska] representatives, and others) will also include the BLM identifying adequate avoidance, minimization, and mitigation measures for adversely affected historic properties. As such, the BLM will continue to consult on protection measures for historic properties, including those associated with Wilson Butte Cave and Minidoka NHS, and will consider the additional setback distance provided in comment.
12177-4	Carol A. Overland	The DEIS, Section 3.5.9 addresses "Native American Resources" and addresses 1 mile and 2.5 mile setbacks, and states: Wilson Butte and Cave, Sid Butte, and other buttes and cultural resources of potential concern to Native American Tribes are within the up-to-2.2-mile operational noise zone where project-related noise would occur. P. 3-149. This 2.2 miles "noise zone" setback is NOT sufficient, and there is precedent of siting wind near Native sites with a 6.5 mile setback.	See response to comment 12177-1 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding setbacks.
12177-5	Carol A. Overland	Tribal Treaty Rights span a variety of subjects, including rights reserved by Tribes in relation to natural resources (i.e., the right to hunt, fish, and gather on land ceded by or land retained by Tribes) (ACHP 2021) (see also 36 CFI00.2(c)(2)(ii)(B)). Established treaties are binding federal law. Tribal Treaty Rights must be considered in the agency decision-making process, consistent with the federal government's trust responsibility to federally recognized Indian Tribes (ACHP 2021; ACHP et al. 2021). DEIS, p. 3-153. This siting proposal requires compliance with the U.S.' "trust responsibility," which goes further than the strict letter of the law, and requires heightened responsibility and respectful siting in light of the importance of these lands. See DEIS, first paragraph on page 3-153.	Tribal Treaty rights are addressed in the EIS; see Section 3.5.1.
12276-1	Dean Dimond	As part of the application process the BLM is supposed to study the Whole project area and identify anything that maybe eligible for the National historical registration. The DEIS does list the Wilson Butte Cave but fails to mention all others. Two that comes to mind are 1. The Milner/Gooding Canal and the three camp area that were used to build the canal system. There has been survey work done and the Canal and it has been determined that the canal system is eligible for the register. This eligible determination affords the canal the same protection as if it was listed on the register. 2, The historical sheep trails in the area. The one I am aware of is the Wendell Trail system. This trail system clearly meets the requirements of being listed on the register. The BLM must fully evaluate this and modify the EIS to accommodate this listing.	In addition to the Wilson Butte Cave historic property, cultural resources such as the Milner-Gooding Canal and associated sites are addressed under EIS Section 3.5.4 and 3.5.5 and, accordingly, assessed throughout the cultural resources sections at Section 3.5. Appendix 9 (Cultural Resources Potentially Affected by the Action Alternatives) of EIS Appendix 8 summarizes cultural resources within the physical and non-physical APE for the project per action alternative and includes the Milner-Gooding Canal, Milner Dam, and others, including historic trails in the area of potential effects. Appendix 6 of EIS Appendix 8 identifies the Milner Gooding Canal and the Wendell Trail Stock Driveway as NRHP-eligible historic properties. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. See response to comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the further identification and assessment of effects to historic properties prior to project construction. See response to comment 11534-18 for further discussion of the Millner-Gooding Canal and similar or related historic properties.
12307-25	Dean Dimond	In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: Local access issues have not been considered and the impact on viewsheds at historical and culturally significant sites,	Regarding concerns related to access, please see the EIS Transportation section (3.14). The impact of the project on the viewshed and setting of historical and culturally significant sites is the subject matter of EIS Section 3.5. The BLM has fully disclosed in the EIS (see Section 3.5) that the project is anticipated The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all historic properties in the area of potential effect would be adversely affected. At historic properties that would be adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (as analyzed in Section 3.5). As stated in the EIS Introduction section, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, including through additional new studies.
12338-4	National Park Service	Topic #3 – Possible Mitigation Topics Section: 3.5.6 Cultural Resources This section focuses on possible compensatory mitigation for impacts to Minidoka NHS. In terms of the potential forms of compensatory mitigation, the NPS would like to work with BLM to include a new or revised framework, beyond what is identified in Appendix 4, Table 4-5, for addressing compensatory mitigation, where warranted. For example, the framework may address without limitation: • Land protection measures to protect the Park Unit viewshed or associated resources. • Endowment to support interpretation, educational programs. • Support of special events, including events in support of commemoration and healing at Minidoka NHS. • Preservation and restoration of existing Park Unit assets including cultural landscapes and historic structures. • Administration, monitoring, operation, maintenance, enforcement, and replacement costs associated with compensatory mitigation. • Funding mechanisms and amounts; and • Timeframes for implementation.	In response to and in consultation with NPS, the BLM has added a Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site to EIS Appendix 4 (Mitigation). The BLM has been consulting with the NPS, the Minidoka-connected community, and others on potential project impacts to Minidoka NHS and surrounding concerns pursuant to NHPA Section 106 and to inform EIS preparation and will continue to do so. The BLM will continue to consult with NPS and other consulting parties under NHPA Section 106 to determine mitigation measures in the PA and to inform the EIS analyses, including consideration of those measures proposed by NPS in comments here, funding mechanisms and amounts and timeframes for implementation.
12338-9	National Park Service	Section: 3.5.6 Cultural Resources Page: 3-172 to 3-189 The NPS recommends BLM complete the identification, assessment, and resolution phases for all non-physical effects to NPS properties prior to issuance of the Record of Decision, and to include such information in the final EIS and the Programmatic Agreement. The National Park Service and Advisory Council for Historic Preservation (ACHP) maintain it is important to resolve known adverse	EIS Section 3.5 analyzes the full range of cultural impacts in the area of potential effects for physical and non-physical impacts to cultural resources. For additional summary of existing literature on the range of cultural resources in the area of potential effects, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10.

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		direct and indirect effects and that those effects be disclosed during the public process and prior to the issuance of the final EIS and Record Of Decision (NEPA_Section106_ 072922.pdf (achp.gov)).	As stated in the EIS Introduction section, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, including through additional new studies. The PA is being prepared by the BLM in consultation with NPS and other consulting parties, and with the opportunity for public comment, including as presented in EIS Appendix 8. The BLM's EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community concerns identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. BLM-recognized consulting parties, as long as they participate and regardless of deciding to sign-on to the PA, have opportunities to review and consult on PA documents such as reports and plans, including the HPMP and HPTPs that would detail the address of historic property management and treatment pursuant to the PA. This includes consultation on the avoidance, minimization, and mitigation of adverse effects to historic properties, including Minidoka NHS.
12398-6	US Environmental Protection Agency	Potential Impacts to Cultural Resources and Coordination with Tribes Because of anticipated major adverse impacts to cultural resources from the project, EPA recommends that the FEIS: • Demonstrate that all impacts to cultural resources will be avoided, minimized, and/or mitigated. The DEIS indicates that only 17% of the project's area of potential effects (APE) has been surveyed for cultural resources and that surveys on the remaining 83% are still needed to determine impacts to cultural resources and measures to be taken to avoid, minimize, and mitigate the impacts.	EIS Section 3.5 (Cultural Resources) provides background on previous cultural resource identification efforts in the project area. Review of Idaho SHPO, NPS, and BLM cultural resource records finds that documented cultural resource field surveys cover approximately 17% of the area where physical effects from the project could result, such as within project siting corridors. The EIS does not say that that remaining 83% of the APE in those areas would require field surveys and does not intend to imply such. See Stipulation C of the PA (EIS Appendix 8) regarding Class III intensive field survey that would occur for the authorized ROW, should the project be approved. EIS Section 3.5 analyses the full range of cultural impacts in the area of potential effects for physical and non-physical impacts to cultural resources, not solely a subcomponent. For the full review of existing literature on the range of cultural resources in the area of potential effects, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022) cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. The EIS includes considerations of avoidance, minimization, and mitigation for the full range of cultural resources where the BLM would require these measures. See also comment 12398-7 regarding preparation of a PA to address additional cultural resources identification efforts, as through field survey and other methods, and regarding the avoidance, minimization, and mitigation of adverse effects. As stated in the EIS Introduction section, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as intensive field survey.
12398-7	US Environmental Protection Agency	• Include a copy of the final Programmatic Agreement (PA) designed to guide this project implementation, consistent with the National Historic Properties Act (NHPA) requirements. Specifically, EPA encourages BLM and the Applicant to: § Treat the MNHS as a cultural resource subject to protection of the NHPA and include this Site in the proposed project's APE. § Finalize the draft PA such that it provides for participation of groups with interest in the MNHS as signatories or non-signatories to the PA, if appropriate, and allow such groups to participate in an evaluation of whether the Lava Ridge Wind Project will impact historic and cultural resources like the MNHS. If the project has adverse effects, allow these groups to participate in the development and implementation of the contemplated Historic Properties Management Plan and the resource-specific Historic Properties Treatment Plan to avoid, minimize or mitigate adverse effects on cultural or historic resources in the project's APE. § Continue to consult with all affected Tribes and coordinate with other stakeholder groups, and consider their input when making decisions regarding the project.	The PA is being prepared by the BLM in consultation with consulting parties and with the opportunity for public comment, including as presented in EIS Appendix 8. The BLM has identified Minidoka NHS as a historic property and has been consulting with the NPS, the Japanese American community, and others on potential project impacts to this historic property pursuant to NHPA Section 106 and to inform EIS preparation. The BLM's EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community concerns identified through the following: project scoping; Section 106 consultation with Native American Tribes and other consulting parties (per 36 CFR 800); the BLM's Government-to-Government consultation with Native American Tribes; and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American communities in Idaho and throughout the United States with connections to Minidoka NHS. The NPS, organizations and individuals representative of the Minidoka-connected community, and other qualified parties under the NHPA Section 106 process (36 CFR 800.2) have joined the NHPA Section 106 consultation process as consulting parties and may decide to sign the PA as relates to their role as consulting party. BLM-recognized consulting parties, as long as they participate and regardless of deciding to sign-on to the PA, have opportunities to review and consult on PA documents such as reports and plans, including the HPMP and HPTPs that would detail the address of historic property management and treatment pursuant to the PA. This includes consultation on the avoidance, minimization, and mitigation of adverse effects to historic properties, including Minidoka NHS.
12656-1	Regina Smith	In the Lava Ridge wind turbine DEIS; Seven field verified segments of the Oregon Trail are listed as eligible under criterion A, unevaluated and not eligible. Unevaluated segments must be considered eligible until they have been rated. Three segments are listed on the National Register in volume three, appendix 9; the Northside alternative, Oregon Trail/Kelton road and the Oregon Trail, California Trail. (Milner Ruts isn't listed in the appendix as such.) Of the seven aspects of integrity, the Oregon Trail would qualify for location, setting, feeling and association. The DEIS talks about the Milner Ruts 9.4 miles from the viewshed. I can see the flag at Flying J from before I cross the Perrin Bridge approximately 4 miles away. While I don't know the height of the flag, I'm sure it's not 740 feet. I can even see the flag's pattern in the colours. I have relatives on two branches of the family tree who followed immigrant trails to get out west. We in the west have fought many battles to preserve the integrity of setting along the immigrant California Oregon Trails. This project will infringe, reduce, and even destroy that feeling of space and time. The integrity of setting, and of feeling. Volume one of the DEIS page 3–178 discusses the viewshed as seen from the Oregon Trail at Milner Ruts, "the project would attract attention, but	KOPs are as described in EIS Section 3.16 (Visual Resources). The KOP representative of the Oregon Trail, where identified trail segments are relatively intact most proximate to the proposed project structures, is situated by the Milner Ruts. This is KOP 4, and visual simulations for KOP 4 of both 3-MW and 6-MW turbine examples are provided within Appendix C of the project visual resources technical report, which is available on the BLM website for the project as supporting information for the EIS (and is SWCA [2023] as cited in the EIS Section 3.16). As noted in the EIS, within Section 3.5, the nearest proposed turbines for the project could begin just under 10 miles from KOP 4, in relation to the Milner Ruts, at which distance the turbines would begin to fade into the middle ground, rather than be in the foreground from the Oregon Trail at that location. In the visual simulations for KOP 4 the simulated turbines are generally smaller and lower in appearance and blend with the horizon more than do electrical distribution lines or even juniper or other trees in the foreground. As the EIS analysis concludes in Section 3.5, the visual prominence of the turbines in relation to the Milner Ruts would be obvious and have sufficient size or contrast to compete with other landscape elements, but the turbines would have insufficient

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		would not dominate the views." Continuing on with "the Oregon Trail near Milner Ruts (KOP 40) would experience a minor degree of visual change". This opinion is not supported since photograph simulations of wind turbines on the viewshed are not included in the DEIS. Immigrants coming across the nation did not encounter windmills of any size certainly not hundreds towering over the height of the Statue of Liberty or the Perrin Bridge (from the water level). Page, 3–188 " this would include related irreversible effects to significant cultural resources of the Japanese American community and the Native American tribes." The Oregon Trail isn't even mentioned. 34+ years is the equivalent of 1 1/2 generations. This means your grandchildren and great grandchildren and mine will never see it in its pristine condition. Since I am retired, you may even have children who will never experience the feeling of going back in time and seeing the trail as it looked during the immigrants travel. Or experience the endurance of these pioneers in our history. The DEIS blithely states that recreationists can go recreate elsewhere. If the Lava Ridge, Taurus, and Salmon Falls projects all go through, there will be no other elsewhere to experience the Trail in its historic setting.	visual contrast to strongly attract visual attention and insufficient size to occupy most of the observer's visual field. The action alternative analyses in EIS Section 3.5 (Cultural Resources) compare the differences in potential impacts to the Oregon Trail from each alternative, noting which would have comparable, greater, or lesser potential for visual impacts to the Oregon Trail at the Milner Ruts as well as in relation to other Oregon Trail segments in the project area of potential effects. The project would not have physical impacts to the Oregon Trail; any project effects on the Oregon Trail are anticipated to be visual. Cumulative impacts are also analyzed.
12859-12	Kristen Brengel, Robyn Achilles; Friends of Minidoka	BLM has not complied with FLPMA's requirement to inventory resources on public lands. Section 201 of FLPMA requires BLM to "maintain on a continuing basis an inventory of all public lands and their resource and other values (including but not limited to outdoor recreation and scenic values)."127 During World War II, the Minidoka Relocation Center was located on approximately 33,000 acres of federal land, which included approximately 950 acres of land for barracks and administration facilities. Following World War II, the U.S. government conveyed lands to returning veterans to develop farms. Over the past 30 years, the National Park Service, Presidents and Congress have clearly documented the importance of Minidoka and the Minidoka Relocation Center. As noted below, in 1992, Congress directed the Secretary of the Interior to study Minidoka as part of a National Historic Landmark Theme Study. To support the study, the National Park Service issued a comprehensive report in 1999, entitled Confinement and Ethnicity, which identified important historic resources at the Minidoka Relocation Center and other sites.128 In 2001, President Clinton designated the Minidoka Internment National Monument as a unit of the National Park System. As required by the Monument Proclamation and NPS planning regulations, NPS developed its general management plan (GMP) in consultation with the BLM.129 In 2006, the GMP recommended the administrative transfer of Minidoka's dump site from the BLM to the NPS.130 The 2008 Minidoka legislation authorized the transfer of 80 acres of BLM land to NPS, which has been completed. Also, the NPS identified Minidoka as nationally significant in the Japanese Americans in World War II Theme Study.131 Despite the significant amount of public information about the importance of Minidoka, BLM failed to update its inventory of historic resources on BLM lands. BLM also did not maintain the required visual resource inventories and prepare visual resource management classes or perform five-year plan reviews. While the Biden Administration has a nationwide goal of 25 gigawatts of renewable energy on public lands by 2025, there are clear statutory authorities that direct BLM to protect Minidoka and no direct authority relating to the location of the Lava Ridge Wind Project.	The BLM has added EIS Section 3.19, Minidoka National Historic Site Interpretive Purpose and has added a Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site to Appendix 4 (Mitigation). Minidoka NHS is prominently identified in the EIS, and features and sites of the WRC landscape are identified within Appendix 6 of EIS Appendix 8. In addition to NEPA analysis within this EIS, the BLM is addressing Minidoka NHS and associated areas and resources under NHPA Section 106, as the EIS references. The Section 106 process at 36 CFR 800.4(c)(1) considers that the passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible and that there is the potential for properties to be identified within a given area of potential effects that have not been previously evaluated for NRHP eligibility. The current EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking to protect Minidoka NHS and other historic properties. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, and FLPMA in advance of the current project. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA, completing the Section 106 process. The BLM conducted a project level visual resource inventory to identify visual values within the established analysis area for visual resources. The current resource management plan does not have visual resource management classes established and the BLM is evaluating an interim process to identify visual resource management classes for the project area. Since there were no established visual resource management objectives a 5-year plan review did not occur.
12859-35	Kristen Brengel, Robyn Achilles; Friends of Minidoka	3.16.1.1.2 Key Observation Points BLM's analysis of visual impacts is flawed based on an incomplete and inaccurate methodology of visual sensitivity for the Japanese American community. According to the project's consultant, "[v]isual sensitivity reflects attitudes and perceptions held by people regarding the landscape and, in general, reflects the public's level of sensitivity for noticeable change to the landscape."240 Sensitive user groups. The DEIS identified three key observation points (KOPs) associated with Minidoka, including the new visitor center (KOP 1), barrack block 22 (KOP 2) and the view looking east towards the Honor Roll from the park entrance (KOP 16).241 The DEIS defines tourist and recreational users as "local and seasonal residents engaged in recreational activities, and tourists and recreation users visiting from outside the local area."242 However, the DEIS wrongly categorizes members of the Japanese American community as "tourists and recreational users." In contrast to this mischaracterization, Lawrence Matsuda, a Minidoka survivor, states "I'm not a 'tourist.' I am a survivor."244 As a result, this list does not accurately reflect the connection between the Japanese American community and Minidoka, which is sacred ground. Minidoka is not a tourist attraction for the Japanese American and Alaska Native communities with family connections to Minidoka. It is a place of deep sacred connections to family members who are no longer with us, to Nihonmachis (Japantowns), farming communities, schools, friends, jobs, businesses, houses, pets and neighborhoods lost forever because of racism and prejudice. Minidoka is a place of deep spiritual resonance and connection. While the project consultant highlighted the unique sensitivities of the Japanese American community, the DEIS does not accurately describe or analyze the visual impact on the Japanese American community, including survivors, descendants and Japanese Alaskans.245 We recommend that BLM develop a new category of sensitive users, maybe entitled commemorative users,246 and develop a new methodology for assessing the impacts. We note that there might not be this type of analysis available because agencies generally respect sacred ground and avoid siting energy projects in areas that would impact national park units, such as the Manzanar National Historic Site247 and the Sand Creek Massacre National Historic Site. BLM's current methodology is flawed because it only lists limited types of sites that have "visual importance relative to one's home, social, business, and recreation environment."248 If BLM seeks to locate renewable energy sites in high conflict areas, BLM could consider adding "sacred ground, memorials to veterans and victims of racial prejudice, cemeteries, places of healing and commemoration, Traditional Cultural Property and sites of religious significance" to this list of types of sites.	KOPs for the project were chosen and agreed upon by the BLM and NPS for representation of Minidoka NHS, and their analysis conforms to BLM standards for visual resources management as cited in EIS Section 3.16 (Visual Resources). The selected KOPs are detailed in Section 3.16.1.1 (Key Observation Points) in EIS Appendix 9, and impacts to observers in those areas are detailed in Section 3.16.1.2 (Impacts). The EIS has been revised to correctly represent the Japanese American and Minidoka-connected community (including Japanese or Alaska Native). The BLM apologizes for indicating in any manner that the Japanese American and Minidoka-connected communities and Native American Tribes are within the sensitive viewer group of "tourists and recreationists," and the EIS is revised to not indicate or imply this. Because of the sensitive character of resources or landscape features assessed from certain KOPs, and their strong connections to these, the BLM understands and respects that the Japanese American and Minidoka-connected communities and Native American Tribes should not be referred to as "tourists" in any manner in relation. For consistency with the Minidoka NHS foundation document (NPS 2016), the terms "visitors and survivors" were used to characterize Japanese American community members within the Environmental Justice and Cultural Resource sections of the draft EIS (EIS Sections 3.5 and 3.6). In EIS revisions, the group formerly referred to under Visual Resources (EIS Section 3.16) as "tourists and recreationists" has been replaced with "visitors" and as "survivors and descendants of the incarcerated" within the Environmental Justice and Cultural Resource sections of the EIS. The commenter was correct that visual resource management categorizations included categories that did not fully reflect the connection of the Japanese American and Minidoka-connected communities to Minidoka NHS and surrounding area and caused offense, no matter how inadvertent. For this reason, the EIS has not solely relied on these categorizations but also considers the unique sensitivities of the Japanese American and Minidoka-connected communities, as the commentor has noted. Within the issues analyzed, the sensitivities, perceptions, and concerns of the Japanese American and Minidoka-connected communities are therefore specifically addressed in the Visual Resources, Cultural Resources, and Environmental Justice sections of the EIS. EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) incorporates information from BLM consultation with the Japanese American community, their concerns, and interests. The DOI Office of Collaborative Action and Dispute Resolution further conducted outreach efforts to the Japanese American community in Idaho and throughout the United States to identify and consult on community interests and concerns and receive input on the project and produced a summary report on these efforts, as cited in the EIS. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Although sites of visual importance to one's home, social, business, and recreation

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			environment are considered in the Visual Resources section of the EIS, the range of cultural resources that include sacred ground, memorials (including as to veterans and victims of racial prejudice), cemeteries, places of healing and commemoration, TCPs, and sites of religious significance are a consideration of EIS Section 3.5 (Cultural Resources). The BLM has revised the visual sensitivity for Minidoka NHS and surrounding WRC to be high sensitivity, instead of moderate; see EIS Section 3.16 (Visual Resources). However, the degree of visual contrast for wind turbines will remain moderate based on visual resource management analyses in Section 3.16. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
12968-10	Charles Brockway	The analysis in the EIS of effects on cultural resources, including aesthetic, visual impacts, and aural impacts, is inadequate. The EIS identifies major impacts on these resources and identifies no proposed mitigation efforts. The massive degradation of the landscape in terms of visual impact is hard to overstate. The EIS underestimates the radius within which the proposed turbines would be visible, based on line-of-sight analysis.	The BLM has fully disclosed in the EIS (see Section 3.5) that the project is anticipated to have unavoidable visual adverse effects on historic properties due to the scale and nature of project elements. The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all historic properties in the area of potential effect would be adversely affected. At historic properties that would be adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties. At historic properties that would be unavoidably adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (pursuant to NHPA Section 106, see EIS Appendix 8, and as analyzed in Section 3.5). The BLM's statements in the EIS Section 3.5 on these subjects as they relate to cultural resources remains correct. Regarding the distances at which turbines would be visible and visual impacts of the project on the landscape, see also EIS Section 3.16 (Visual Resources). Please further note that the area of potential effects for which cultural resources may be visually impacted in Section 3.5 (Cultural Resources) considers the distance at which adverse effects could occur at historic properties and not solely the ability of people to sight turbines within the range of human visual acuity. See also EIS Appendix 3 Table App3-1 at AIB-20 for further consideration of noise impacts on the landscape.
12982-19	Jerry Taylor	The cavalier and disingenuous approach to the history of this place disrespects the memory of those valued neighbors whose parents and/or grandparents were forced into internment camps and lost everything in the process. It disrespects those who settled this place and brought irrigation to a desert, not to mention the native peoples who have a much longer cultural history and memory. They should not be shoved aside based on cold and calculating processes or promises of future actions designed to appease or force unwanted change.	The BLM's current EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking for historic preservation and in relation to environmental justice communities, including as relates to Minidoka NHS and WRC and to Native American resources (see EIS Sections 3.5.1 and 3.5.2). The BLM is diligently proceeding with NEPA, NHPA, and other regulatory processes as relates to the project and is consulting in good faith. Although the process may be regulatory, the BLM's good faith consultation intends to be respectful to all parties and the public and their input. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, and FLPMA, as well as other laws, in advance of the current project. The BLM will continue to plan for and consult on the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS and adversely affected Native American resources, under a PA, completing the Section 106 process. NEPA requires the consideration of alternatives to the Proposed Action when significant environmental impacts could result. The BLM reviewed a No Action alternative and developed action alternatives with consideration for avoiding or minimizing Project impacts, including to affected Japanese American and Minidoka-connected communities and Native American Tribes and the cultural resources of importance to those and other communities. The development of alternatives included incorporation of community concerns identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States.
12988-13	Melody Asher	DEIS 3.5.2 Native American Resources Your DEIS says "Native American resources, as the term is used in this EIS, refers to cultural resources or artifacts created by Native American Tribes or cultures and to places and landscape features of significance to Tribes, whether or not these resources are subject to the NHPA, ARPA, or NAGPRA, and to natural resources (such as plants, animals, and minerals, or geographic features like buttes and caves) that are spiritually and culturally significant to Tribes, including resources for which Tribes have treaty-protected rights. Impacts to these resources could diminish Tribes' treaty rights or other rights as recognized under the AIRFA and EO 13007 (May 1996: Indian Sacred Sites) and those addressed under Joint Secretarial Order (JSO) 3403 and the Memorandum of Understanding (MOU} Regarding Interagency Coordination and Collaboration for the Protection of Tribal Treaty Rights and Reserved Rights (ACHP et al. 2021}." When I was at Wilson Butte Cave recently and sat on top of the formation I was awed by the fact that I was sitting where many peoples from 10,000 to 15,000 years ago also sat. The quiet and the view were a very large part of that experience and if there are wind turbines surrounding the cave area that experience would not be anything like what it is now or what it was 10,000 to 15,000 years ago. I believe that you should choose Alternative A (No Action) until the time that the state and federal agencies, renewable energy industries, local communities, Native American Tribes and other interested parties get together and identify and prioritize areas of lowest environmental impact. We need to consider the cumulative effects of multiple wind turbine projects (along with multiple solar power projects) to our ecosystems and wildlife of all types.	Impacts to Wilson Butte Cave were specifically identified by Tribes and other consulting parties to be of heightened concern. Non-physical impacts (visual and audible impacts) to the Wilson Butte Cave site as a historic property are analyzed for all alternatives under EIS Section 3.5, and these analyses found that adverse effects could result to the Wilson Butte Cave historic property, to varying extents, under any of the action alternatives. Although a 1-mile setback was incorporated into the project design under the Proposed Action to avoid physical impacts to this significant cultural resource, non-physical visual and auditory impacts would not be fully avoidable. Specifically, the integrity of setting and feeling of this historic property could be adversely affected through non-physical project effects. The BLM is completing its finding of effects to historic properties under NHPA Section 106. Cumulative effects are addressed under the EIS, as at Section 3.5 (Cultural Resources) and for historic properties pursuant to the project PA (see EIS Appendix 8).
13000-2	Nathan Small	The Tribes would like the BLM to consider the following comments while making your recommendations for evaluation in the final EIS and particularly when drafting the Record of Decision for the project. • The project	As stated in the Introduction, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand

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		lacks pertinent cultural resources information; including adequate ethnographic information and sufficient design progression to enumerate the actual impact of construction/operation activities.	the basis for that decision making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as ethnographic studies. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022), and the Class I cultural resources report for the BLM Twin Falls district (Far Western Anthropological Research Group, Inc. 2022), cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. For additional presentation on project design, informing the EIS analysis of impacts from construction and operations activities, see MVE (2023).
13000-4	Nathan Small	The project does not adequately address the massive net-loss in public lands for the Tribes' Treaty rights and interest, or the physical occupation of the land's surface for decades to come.	In accordance with NEPA, the EIS fully considers impacts to natural and cultural resources from proposed long-term (up to 36-year plus the time it takes to reach successful reclamation following decommissioning) occupation of lands by the project, including such plant, animal, water, and mineral resources that may be associated with tribal rights or interests under the Fort Bridger Treaty of 1868. EIS Section 3.5.1 (Native American Resources) connects these resources to tribal contexts, including as relates to treaties between the U.S. and Tribal Nations. See Table 2.4-1 (Project Components by Action Alternative). Additionally, as noted in Table 3.5-3 in Section 3.5.4 (Cultural Resources, Physical Impacts), the total ground disturbance under the Proposed Action would be 9,114 acres. Ground disturbance under Alternatives C, D, and E would each be lessened from that of Alternative B, and the BLM's Preferred Alternative would comparatively have 4,492 acres of ground disturbance (51% less than under Alternative B). Also, development of the project would not eliminate public access of the BLM public lands within the project area.
13000-7	Nathan Small	The DEIS does not present Treaty Rights, or cultural resources, accurately in the document and purports to 'mitigate' the project without consulting the Tribes.	The BLM clearly and accurately describes how cultural resources are considered in the EIS in Section 3.5 (Cultural Resources) in accordance with federal laws and regulations. This includes the consideration of Native American resources and treaties at Section 3.5.1. The BLM appreciates the Native American views and insights on cultural resources and on treaty rights presented by Tribal Nations in consultation under NEPA and NHPA Section 106, as well as received in comments and correspondence on the project from Tribal Nations. The BLM continues to consult with Tribal Nations on the project under NEPA and NHPA Section 106 including regarding the mitigation of project effects to tribal communities and resources of tribal concern as compiled in EIS Appendix 4 and as addressed under the PA at EIS Appendix 8. The BLM has not purported to mitigate the project. The BLM would not have project mitigation finally set or ultimately implemented until it makes a decision on the project following the completion of the NEPA and Section 106 processes with the signing of a ROD on the project.
13000-9	Nathan Small	Background The various bands of the Shoshone and Bannock people traditionally roamed extensively throughout the Great Basin and Intermountain region; with specific bands occupying the landscapes of the Snake River Plains and surrounding mountains from time immemorial. Prior to non-Indian settlers entry into the region, Indians utilized the rich natural resources, and enjoyed the cultural traditions and lifestyles unique to our people. The Tribes called their aboriginal territory, "bia sokoppe" the Shoshoni term referring to Mother Earth, or literally, "our big lands". The removal of our people to reservations remains a dark moment in our history, with generations carrying on stories of our homelands. In June 1867, an Executive Order established the Fort Hall Indian Reservation, as a collective place to consolidate the various bands of Shoshones and Bannocks, from their aboriginal lands, clearing the way for European-American settlements, such as ranchers and miners who desired rich resources present on aboriginal lands. The United States then signed a treaty, the Treaty with the Eastern Shoshone and Bannock Indians in 1868 (commonly referred to as the "Fort Bridger Treaty"), to protect our subsistence rights to harvest foods, medicine, and materials from our homelands. This document established a political entity we now refer to as the Shoshone Bannock Tribes (Tribes) who are the stewards of the unique culture, homelands, and practices of our people from time immemorial. The 1868 Fort Bridger Treaty (15 Stat 673) affirmed the reservation reserved by Executive Order in 1867 and reserved certain off-reservation use rights for the Tribes. Article IV states: The Indians herein named agree, when the agency-house and other buildings shall be constructed on their reservations named, they will make said reservations their permanent home, and they will make no permanent settlement elsewhere; but they shall have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts. In addition to the reserved rights to 'hunt' for our subsistence foods on the unoccupied lands of the United States, the Shoshone-Bannock Tribes specifically reserved land rights in the 'Camas Prairie' region of central Idaho. Due to a scribe's error, the Camas Prairie was never designated by the US government as a component of our reservation, the first of many broken Treaty promises across our lands. Our cultural connection has never been severed, and the region this project is located on is one of the richest cultural landscapes for our people that remains in the area. Statement of Policy for Management of the Snake River The Tribes stress the importance of initiating efforts to restore the Snake River system and affected unoccupied lands to a natural condition. The Tribes' Policy for Management of the Snake River Basin Resources states: The Shoshone Bannock Tribes (I'ribes) will pursue, promote, and where necessary, initiate efforts to restore the Snake River systems and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions which most closely represents the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work to ensure the protection, preservation, and where appropriate-the enhancement of Rights reserved by the Tribes under the Fort Bridger Treaty of 1868 (I'reaty) and any inherent aboriginal rights. The proposed project has the potential to impact a large landscape that is currently home to a myriad of native assemblages of species. While our policy does recognize that anthropogenic modifications are the current paradigm, large-scale projects should not impact future generations of Tribal members' opportunities to enjoy the natural view shed, gather resources and	The additional detail regarding the Shoshone and Bannock people of the Fort Hall Reservation is acknowledged by the BLM and recorded for the project with the comment provided here and cited in conclusion to the Native American Resources subsection of the EIS (Section 3.5.1). Impacts related to Native American Tribes are included in EIS Section 3.6.1 (Environmental Justice Communities). Impacts related to visual resources, including those with natural landscapes, are described in EIS Section 3.16 (Visual Resources). Impacts related to natural and cultural resources of traditional importance to Tribes in Section 3.5 (Cultural Resources). The EIS overall intends to accurately disclose the environmental impacts of the project under the NEPA. Mitigation of impacts, including those effective of resources of tribal concern, is addressed in EIS Appendix 4 (Mitigation).

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		continue traditional cultural practices. Each project must be objectively evaluated and those noted impacts must be mitigated equitably for the Tribes.	
13000-10	Nathan Small	Statement of Policy for Cultural Resources In the view of the Shoshone and Bannock people, cultural resources and heritage is broadly defined, through a holistic perspective that embraces plants, air, water, soil, animals, spirituality and humans, with the relationship existing between them. Cultural resources are highly significant because they directly contribute to the Shoshone and Bannock peoples' unique cultural heritage, for the past and into the future. Simply stated, a cultural resource is any resource of cultural character, including social institutions, Tribal identity, subsistence practices, beliefs, religious ceremonies and practices, sacred landscapes and objects, medicinal resources and practices, archaeological sites, natural resources and their use, view sheds, intellectual property, oral traditions, language, historical events, documents and structures, and secular and non-secular items. The Shoshone-Bannock Tribes' Policy for Cultural Resources states: The Tribes retain, assert, and exercise our inherent and ongoing rights as a sovereign government, pertaining to cultural resources and cultural properties. Where federal laws are non-existent or inconsistent, the Tribes will continue to exercise our inherent rights and unwritten traditional practices, in regards to the management of cultural properties and natural resources. It is the Tribes' right and responsibility to interpret and perpetuate cultural and heritage resources for future generations of Tribal members and the Tribal community. The Tribes continue to practice our unique subsistence lifestyle that maintains Tribal traditions and ceremonies, improves health, and utilizes ancestral territories. In addition, the Tribes will continue to work diligently to ensure the protection, preservation, and enhancement of our rights for future generations. The DEIS describes numerous physical and non-physical effects both irreversible and irretrievable to Tribal resources from all the Action Alternatives. With only 17% of the Area of Potential Effect having received previous cultural resource field surveys identifying 199 cultural resource sites. The Tribes believe the APE could potentially hold thousands of cultural sites that could potentially be lost forever and the DEIS suggests that these irreversible losses can receive compensatory mitigation in the form of an ethnographic study; a report that should have been used for analysis purposes. This is an unacceptable form of mitigation. Mitigation in the form of documentation is not equitable to the loss of the resource.	The BLM appreciates the Native American views and insights on cultural resources and on the project presented by Tribal Nations in consultation under NEPA and NHPA Section 106, as well as received in comments and correspondence on the project from Tribal Nations. The BLM has further sought the perspectives of Tribes through consultation on the project, as described in EIS Section 3.5.1 and EIS Appendix 10. EIS Section 3.5.1 summarizes the connections of Tribal Nations—the Shoshone and Bannock peoples specifically—to the project area and acknowledges the traditional cultural and religious—or sacred and spiritual—importance of resources in the area to these nations and peoples. This specifically includes consideration of natural resources (such as plants, animals, and minerals, or geographic features) that are spiritually and culturally significant to Tribes. In accordance with NEPA, the EIS fully considers impacts to natural and cultural resources from proposed long-term occupation of lands by the project, including such plant, animal, water, and mineral resources that may be associated with tribal rights and interests in the area. The policy statement of the Shoshone-Bannock, as quoted in the comment, are further placed in the record with this comment here. EIS Section 3.5 (Cultural Resources) calculates that the area of potential effects for the project could hold thousands of cultural resources potentially important to Tribal Nations and others. However, the BLM would implement measures to avoid, minimize, and mitigate adverse effect to cultural resources of traditional cultural or religious significance to Tribal Nations, pursuant to the EIS and a PA under NHPA Section 106. The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all cultural resources in the area of potential effect would be adversely affected. At historic properties that would be unavoidably adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (pursuant to NHPA Section 106 and as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties. The mitigation of adverse effects, following the EIS and pursuant to a PA, can be other than only an ethnographic study. EIS Appendix 4 describes a variety of additional mitigation measures applicable to cultural resources. The BLM acknowledges the commenter's statement that Tribes do not consider ethnographic study to be an appropriate mitigation, in and of itself, and has accordingly updated final EIS Appendix 4 to no longer include ethnographic study as a pre-stated mitigation measure for Tribal resources. The BLM will continue soliciting input from the Shoshone-Bannock Tribes and Shoshone-Paiute Tribes to avoid, minimize, and mitigate project impacts to Tribes. As stated in the Introduction, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision making. As such, the EIS provides sufficient information to understand the basis for that decision making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as ethnographic studies. For additional cultural resources context, see the project's cultural resources Class I inventory report and report addendum (Power 2021, 2022), and the Class I cultural resources report for the BLM Twin Falls district (Far Western Anthropological Research Group, Inc. 2022), cited in EIS Section 3.5 (Cultural Resources) and referenced in EIS Appendix 10. For additional presentation on project design, informing the EIS analysis of impacts from construction and operations activities, see MVE (2023).
13000-12	Nathan Small	Cultural Resources The Snake River Plain is identified as a component of our ancestral lands and our people roamed these lands and waterways from time immemorial in a seasonal round that sustained our unique culture. The Tribes have identified significant physical cultural resources in the area that will be impacted as a result of the proposed wind project. The Tribes have also identified a high potential for burial sites in the area; the loss of those cultural resources is not acceptable for the Tribes. The relationship between the BLM and the Tribes is government-to-government, with the communications about the locations and potential impacts to physical sites, sacred sites, and traditional cultural properties being protected information. As such, our comments generally to the BLM is that the wealth of 'sites' identified already, as well as their cultural context/integrity, lends credence to the conclusion that the losses of' sites' does not justify the construction and operation of the project. Based on the nature and scale of impacts to our culture, history, and traditions, the Tribes cannot support an alternative for this project and fully recommend a complete re-evaluation of priorities to protect cultural resources from our federal trustees. Additional cultural resources consultations will be necessary throughout the EIS process, particularly because those impacts to cultural resources significant to the Tribes have remained relatively consistent throughout the project concept/planning process. The DEIS missed numerous opportunities to analyze the Tribes perspective which includes our inherent values associated with our seasonal rounds or spiritual and traditional cultural properties of the area. The Tribes requested a training specific for tribal cultural resource monitors to aid and assist the archaeologists performing their Class II survey inventories for the proposed project with the Tribal perspective in mind. This request by no way means the Tribes support the proposed wind project but are insuring cultural resources significant to the Tribes will be identified to the extent necessary for protection and to remain confidential. A land acknowledgement from the BLM should be considered as this land was the ancestral lands of the Shoshone and Bannock people before intrusion from the immigrants to our homelands. Our removal from these lands we considered our homelands was unjust and there is no recognition of these lands as being our ancestral lands.	The BLM appreciates the Native American views and insights on cultural resources and on the project presented by Tribal Nations in consultation under NEPA and NHPA Section 106, as well as received in comments and correspondence on the project from Tribal Nations. Consultation is summarized in EIS Appendix 10. EIS Section 3.5.1 summarizes area background on Native American resources, including those identified by Tribal Nations in consultation with the BLM and excluding any confidential information received from Tribal Nations. The BLM has further sought the perspectives of Tribes through consultation on the project, as described in EIS Section 3.5.1 and EIS Appendix 10. EIS Section 3.5.1 summarizes the connections of Tribal Nations to the project area and acknowledges the presence of traditional cultural and religious importance of resources in the area to these nations and peoples. The BLM continues to consult with Tribal Nations on the project under NEPA and NHPA Section 106 including regarding project effects to tribal communities and resources of tribal concerns and as addressed under the PA at EIS Appendix 8. The BLM, in the EIS, has determined that the project has the potential to result in adverse effects to important Native American resources. Efforts to minimize and mitigate impact to cultural resources are outlined in EIS Appendix 10. Additionally, measures to avoid, minimize, and mitigate adverse effect to historic properties of traditional cultural or religious significance to Tribal Nations would be implemented pursuant to a PA under NHPA Section 106, as referenced in EIS Section 3.5. The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all historic properties in the area of potential effect would be adversely affected. At historic properties that would be unavoidably adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties. The PA for the project would require a HPMP that is to include a monitoring and discovery plan for cultural resources, including planning for the discovery of burials (see EIS Appendix 8). The HPMP is to include the

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			finalization of protection measures and any monitoring areas, according to the PA. Per the stipulations of the PA, the BLM is to consult upon the HPMP with Tribal Nations and consulting parties before approving the final HPMP. The field surveys and monitoring under the PA can include trained tribal monitors, should Tribal Nations choose to directly participate in monitoring as recommended. The EIS within Section 3.5.1 reaffirms that the project lands are the ancestral lands of the Shoshone-Bannock peoples, including as may relate to treaties between the United States and those peoples.
13006-1	Leon Smith	Tribal perspective/cultural resources and Minidoka National Historic Site/Japanese American community 1) Recommend the cultural resource sites need to be identified prior to ground disturbance, beginning with known highly sensitive areas. 2) Recommend that BLM add analysis to the DEIS on how irreversible, irretrievable losses of cultural sites, Tribal treaty rights, and Traditional Cultural Properties will be mitigated.	See responses to comments 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns), 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns), and 11535-54 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding cultural resources identification before ground disturbance and 11557-4 regarding how adverse effects to cultural resources—including TCPs—would be mitigated, including those effects that might be irreversible with irretrievable losses of cultural resources or cultural resources values.
13006-3	Leon Smith	4) Recommend BLM follows policy regarding the identification and protection of cultural resource sites. Have archaeologists on site during construction to ensure sites are avoided. The Historic Properties Management Plan must include these details; sub-committee needs to see the HPMP because they can't evaluate the impacts without it. The Historic Context document would be helpful too; would like to see it as well.	The PA for the project would require a HPMP that is to include a monitoring and discovery plan for cultural resources (see EIS Appendix 8). The HPMP is to include the finalization of protection measures and any monitoring areas, according to the PA. Per the stipulations of the PA, the BLM is to consult upon the HPMP with consulting parties before approving the final HPMP. The PA requires that consultants retained for archaeological services meet the Secretary of the Interior's Professional Qualifications Standards for Archaeology.
13006-4	Leon Smith	Recommend BLM do an ethnographic study to guide the impact analysis and remove it from all the compensatory mitigation sections throughout the document.	The EIS is able to rely on existing information to inform impact analysis. The consideration of adverse impacts to Japanese American and Minidoka-connected communities and Native American Tribes is addressed at EIS Sections 3.6.1 (Environmental Justice Communities), 3.5 (Cultural Resources and Native American Concerns), and 3.16 (Visual Resources). Regarding ethnographic study, see responses to comments 13000-10 (see in Table A-3g, Cultural Resources and Native American Concerns) and 13008-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
13006-9	Leon Smith	11) If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with the Japanese Americans and Alaskan Natives.	The BLM is consulting with Tribal Nations and the Japanese American and Minidoka-connected communities on resources of concern to each, including regarding significant cultural resources under NHPA Section 106. The BLM is preparing a PA to address these resources under Section 106, with certain Tribal Nations and members of the Japanese American and Minidoka-connected communities participating as consulting parties. As consulting parties, Tribal Nations and organizations representing the Japanese American and Minidoka-connected communities have the opportunity to sign on to the PA as concurring parties. Please note the draft EIS was considered complete on its publication. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA (see EIS Appendix 8) is signed, and a project ROD is released. The BLM decision on the project will be stated in the ROD. See response to comment 11315-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
13006-21	Leon Smith	12) Recommend BLM incorporates Tribal and cultural/spiritual perspectives into wildlife/cultural impact analysis.	EIS Section 3.5.1 summarizes the connections of Tribal Nations to the project area and acknowledges the traditional cultural and religious importance of resources in the area to these nations and peoples. This specifically includes consideration of natural resources (such as plants, animals, and minerals, or geographic features like buttes and caves) that are spiritually and culturally significant to Tribes. The BLM has further sought the perspectives of Tribes through consultation on the project, as described in EIS Section 3.5.1 and EIS Appendix 10. See the Wildlife (3.18), Vegetation (3.15), and Water and Wetland Resources (3.17) sections of this EIS for how these resource patterns or availability would be changed by the project.
13006-32	Leon Smith	6) Recommend additional information and analysis of the impacts of additional traffic in the area on Tribes and recognition of treaty rights is needed in the DEIS, including on Tribal gathering, fishing, hunting and trapping access.	Potential vehicle traffic related to the project is quantified in Table 2.4-3 and considered for impacts to Tribes and other Environmental Justice Communities as summarized in Table ES-2 (Summary of Project Impacts). Noise levels, as from project-related traffic, and potential noise impacts on environmental justice communities inclusive of Tribes and on cultural resources of importance to Tribes (Native American resources) are analyzed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities). See especially the Noise and Traffic sections in EIS Section 3.6.1, which notes that MVE would consult with local planning authorities regarding increased traffic during construction, and specific issues of concern would be identified and addressed in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). This includes consideration of impacts on how peoples from these communities may use the project area, as under treaty rights and such as for project-local activities such as may include Tribal gathering, fishing, hunting, and trapping access.
13008-1	Scott Hauser	Cultural Impacts In section 5.1.5 the DEIS states, "Although no known Traditional Cultural Properties (TCPs) or traditional use areas occur in the Project study area, it is through this process that any potential Tribal concerns would be brought to light and addressed through the consultation process. It is possible that interested Tribes may include the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), the Shoshone-Bannock Tribes of the Fort Hall Indian Reservation, and other Shoshone-Paiute groups." First, it is well established that the Shoshone and Paiute people frequented this area and have significant traditional ties to the land and its cultural, spiritual, and natural resources. Pursuant to a statement of policy from the Shoshone-Bannock for cultural resources, "[C]ultural resources and heritage is broadly defined, through a holistic perspective that embraces plants, air, water, soil, animals, spirituality and humans, with the relationship existing between them. Cultural resources are highly significant because they directly contribute to the Shoshone and Bannock peoples' unique cultural heritage, for the past and into the future. Simply stated, a cultural resource is any resource of cultural	EIS Section 3.5.1 summarizes the connections of Tribal Nations—the Shoshone and Paiute Peoples specifically—to the project area and acknowledges the traditional cultural and religious—or sacred—importance of resources in the area to these nations and peoples. The policy statement of the Shoshone-Bannock, as quoted in the comment, are further placed in the record with this comment here and are cited in conclusion to the EIS Subsection 3.5.1 (Native American Resources). The BLM, in the EIS, has determined that the project has the potential to result in adverse effects to important Native American resources and that this could include permanent and irreversible impacts. Efforts to minimize and mitigate impact to cultural resources are outlined in EIS Appendix 10; see also EIS Appendix 4 (Mitigation). Additionally, measures to avoid, minimize, and mitigate adverse effect to historic properties of traditional cultural or religious significance to Tribal Nations would be implemented pursuant to a PA under NHPA Section 106, as referenced in EIS Section 3.5. The BLM recognizes

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		character, including social institutions, Tribal identity, subsistence practices, beliefs, religious ceremonies and practices, sacred landscapes and objects, medicinal resources and practices, archaeological sites, natural resources and their use, view sheds, intellectual property, oral traditions, language, historical events, documents and structures, and secular and non-secular items." Because this area is so culturally significant and sacred to USRT's member tribes, damage to this area from a significantly sized project like the Lava Ridge Wind Project would cause irreversible harm that no mitigation effort could repair.	that not all adverse effects would be avoidable or can be minimized or that mitigation would repair permanent and irreversible adverse effects.
13024-2	Keith Stone	The foundations will require blasting and equipment that will negatively impact the area's cultural resources, and potentially even our water. As recent as 1985, Baker Cave was discovered just north of Rupert. That discovery contained numerous untouched artifacts from native settlers. There are certainly other, yet undiscovered sites across the area proposed for the project. Allowing the project will impact, and possibly destroy sites.	See response to comment 11915-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
3768-1	Sue Page	The environmental impact studies each express concerns for impact to Wilson Butte Cave. Why?	See response to comment 12988-13 (see in Table A-3f, Climate and Greenhouse Gas Emissions).
3871-1	Jerry Ball	The archeological benefits from leaving this area as its present state outnumber the benefits of development. Is it historically and culturally important to the Shoshone-Bannock tribes? We know it is to the Minidoka National Historic Site. The visual (viewscape) and emotional impact of the proposed project will have an impact on the Historical Site. Visitors to the site will have the eyesore of a massive amount of turbines. Southern Idaho citizens should not have to give up our way of life for industrialization of the landscape on federal land around us. BLM is for the pleasure of the citizens, wildlife within its boundary, tourism and recreation for all not the industrialization for profit of a few. Thus, the site will no longer be what is once was or was intended to be when it was reconstructed to honor the Japanese Community.	EIS Section 3.5.1 identifies that natural and cultural resources of importance to the Shoshone-Bannock Tribes occur in the area of potential effects for the project and Section 3.5.2 provides background on the importance of the Minidoka area to the Japanese American and Minidoka-connected communities. Analysis of effects to Minidoka NHS and Native American resources as historic properties are considered variously throughout EIS Section 3.5. Efforts to minimize and mitigate impact to cultural resources are outlined in EIS Appendix 10; see also EIS Appendix 4 (Mitigation) and EIS Appendix 8 (Cultural Resources Programmatic Agreement). EIS Section 3.12 addresses effects to recreation, and EIS Section 3.18 addresses effects to wildlife.
3998-2	Sue Page	I cannot find any study on the effects to the lava fields, the underground tunes and the aquifer when foundation construction begins. It's my understanding there will be blasting twice a day for over 500 days. 500 days of mini earthquakes in Volcanic Geographical Axial sounds ridiculous. What do you think, that much earth disruption will have to Wilson Butte Cave? To the shifting soil? What about the artifacts still being gleaned from the Snake River Plain?	Methods to avoid impacting resources during blasting are outlined in EIS Appendix 4, Table App4-2i (Noise and Blasting), and blasting is further addressed in the Blasting Plan Methodology (Appendix I in MVE [2023]). The BLM received numerous comments on the draft EIS related to the aquifer, and impacts to the aquifer and groundwater quality are addressed in EIS Section 3.17 (Water and Wetland Resources) in the final EIS. See also AIB-30 (re: earthquakes), AIB-31 (re: surface geology and collapse/subsidence), and AIB-49 (re: aquifer) in EIS Appendix 3. EIS Section 3.13 (Soils) addresses project impacts to sensitive soils, soil health, and plant growth material quantity and quality in detail. As noted in EIS Section 3.5 (Cultural Resources), archaeological sites (which may be composed of cultural resource artifacts) may provide further information to researchers that could make these archaeological sites eligible for the NRHP if that information is able to further the understanding of history, including the history of the Snake River Plain. Typically, that information would importantly provide added insights on past human lifeways in the area. See response to comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns).
5332-2	Marilyn Broek	State Historical Preservation Office. Before any dirt can be turned on State of Idaho land our State Historical Preservation Office must do a study and report. They have the duty to prevent projects ruining forever our archeological treasures. I saw no report from this office included in the draft EIS. This office is dedicated and has teeth. Where is this study? If it has not yet been done, why not. A timely use of this requirement can change permitting requirements or completely eliminate the project plan. Where is the SHPO report?	The BLM is the lead federal agency reviewing the project on BLM public lands and is consulting with the State of Idaho on the project regarding state land concerns, and with the state historic preservation officer specifically on cultural resources concerns across the geographical analysis area of the project. This consultation is intended to conclude with the implementation of a PA pursuant to NHPA Section 106, to which SHPO is expected to be a signatory, which would include stipulation on how significant cultural resources such as NRHP-eligible archaeological sites would be identified, evaluated, and adverse effects to them avoided, minimized, or mitigated in continued BLM consultation with SHPO and other consulting parties. This PA and its stipulations are to be in place and to begin implementation prior to any project development proceeding. The BLM would have cultural resources identification reports prepared pursuant to the PA and prior to project construction, which would be submitted for SHPO review and concurrence. That reporting would inform the avoidance, minimization, and mitigation of adverse effects from the project on NRHP-eligible cultural resources.
5896-13	Mike Tylka	I and many others like me have discovered artifacts and locations unknown by official government entities that are cultural treasures and we may or may not choose to share that knowledge. This area probably contains more locations that are unknown and should continue to stay that way. A fire in the area around Mesa Verde National Monument several years ago in Colorado proved that to be true. The north side of the Snake River plain was also used by emigrants traveling to the west over a century ago and this area of forage for animals extended well beyond the canyon rim.	Regarding the identification of cultural resources in the geographic analysis area for the project, see response to comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns). Additionally, the PA being developed by the BLM pursuant to NHPA Section 106 addresses the treatment of unanticipated post-review discoveries of cultural resources.
6511-5	Kelly Varelmann	There are over 4,000 cultural resource sites within the proposed project area. Decimation of this area will undermine the sacred history and interests of both Native Americans and Japanese Americans.	Appendix 9 (Cultural Resources Potentially Affected by the Action Alternatives) of EIS Appendix 8 summarizes cultural resources within the physical and non-physical APE for the project per action alternative. The EIS analysis at Section 3.5 has concluded that action alternatives for the project would result in potential adverse effects to cultural resources, including those of importance to Native Americans and the Japanese American and Minidoka-connected communities. However, the BLM would take reasonable actions to avoid, minimize, and mitigate impacts should it approve any action alternative pursuant to this EIS and a PA under NHPA Section 106. The project would be located on public land and is subject to Section 106 of the NHPA and its implementing regulations (36 CFR 800). As the lead agency for the project, the BLM is required to consider effects on cultural resources from the project undertaking. These considerations include consultations, identification of cultural resources, assessment of impacts, and avoidance, minimization, or mitigation of adverse effects. The BLM is

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			developing a PA to establish a mechanism to address cultural resource identification prior to the undertaking. For more detail, refer to EIS Section 3.5.
6818-1	Don Davies	When projects like Lava Ridge occur, though, they need to be sensitive to the areas where they are being sited, and they need to give back to the local community in a meaninful and durable way. To this end, I would like to make two suggestions: 1) Lava Ridge Towers should be located away from and out of site of the Minidoka National Historical Site. 2) An educational and outreach center that explains the project, it's contribution to fighting climate change, as well as helping to preserve and tell the historical story of the area would be suggested. A re-building of the Greenwood School at 2398 East 990 South, near Hazelton, ID could be a meaninful preservation of local history and heritage, and a unique opportunity for where such a center could be located.	The BLM is contemplating action alternatives that would locate project turbines outside of Minidoka NHS and anticipates that the BLM preferred alternative will locate all project turbines outside of the larger Minidoka WRC. Mitigation measures for adverse effects that would potentially result at Minidoka and that would return meaningful value to the public are contemplated in the EIS, such as at Section 3.5.5.4, and would be further pursued by the BLM under a PA completing the NHPA Section 106 process and associated HPMP and HPTPs. The BLM will contemplate the commentor's proposed mitigation measures, and whether to include them wholly or partially or not, in completing this process.
8256-2	Sue Page	4. Several Native American Tribes hold this area as spiritual with significant cultural resources all protected by the Tribes Treaty Rights. The Upper Snake River Tribes (USRT) Foundation is composed of four Indian tribes of the Upper Snake River region in Idaho, Nevada, and Oregon: the Burns Paiute Tribe, Fort McDermitt Paiute-Shoshone Tribe, Shoshone-Bannock Tribes of the Fort Hall Reservation, and Shoshone-Paiute Tribes of the Duck Valley Reservation.	As described in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the BLM has invited Tribal Nations with traditional connections to the project area to consult on the project, including on significant cultural resources under NHPA Section 106. This includes members of the Upper Snake River Tribes Foundations listed in the comment.
8639-2	Mark Southwick	What about, for example, the Kelton Freight Line Trail, as I understand it, it went through Lincoln County entering at or near Star Lake (Draft Horse watering site) and proceeded north between Dietrich Crater and Dietrich Butte, crossing the Little Wood River near Marley road and proceeding through the Cottonwood slough area. How many other roads, Native American sites, pioneer trails and historic areas are in the proposed area? During construction will the project identify, protect and properly deal with the discovery of such areas or simply hide or ignore them. Though not actively mapped, these sites do exist.	The Kelton Road is considered Site Number 10CA0966/10TF1830 in Appendix 6 of EIS Appendix 8, identified as a historic property that would potentially undergo visual impacts from the project placing turbines on landscape within view of, but away from, this cultural resource. Appendix 6 of EIS Appendix 8 provides a list of previously recorded cultural resources in the project area and its surroundings that could be physically or non-physically (e.g., visually) impacted by the project, per action alternative. The project would be located on public land and is subject to Section 106 of the NHPA and its implementing regulations (36 CFR 800). As the lead agency for the project, the BLM is required to consider effects on cultural resources from the project undertaking. These considerations include consultations, identification of cultural resources, assessment of impacts, and avoidance, minimization, or mitigation of adverse effects. The BLM is developing a PA to establish a mechanism to address cultural resource identification prior to the undertaking. For more detail, refer to EIS Section 3.5.
8790-8	James Ritchie	7. Without positively denoting the location of the turbines it is impossible to gauge the effect on the Wilson Butte Cave and other Native American sites as well as the Minidoka historic site.	EIS Section 3.5 (Cultural Resources) analyzes the effects of the project, including from turbines, on Wilson Butte Cave and other Native American sites, as well as Minidoka NHS and WRC. The analysis considers siting corridors where turbines may be placed under each action alternative and reasonable scenarios for physical and non-physical (e.g., visual, audible) impacts that could occur to cultural resources in relation to turbine and other project actions in these siting corridors.
9080-11	The Coalition to Protect America's National Parks	1. BLM Idaho has never fulfilled its responsibility under the National Historic Preservation Act (NHPA)10 to consider the eligibility of the 33,000-acre Minidoka War Relocation Center (WRC) for listing on the National Register of Historic Places (NRHP) – Federal agency responsibility for considering the eligibility of historic properties for listing on the NRHP is well established. As described in BLM National Training Center's "Brief and Selective Summary by Section"11 of the NHPA: Section 110(a)(2) of the NHPA directs each Federal agency to establish a preservation program to identify, evaluate, nominate, and protect historic properties that are eligible for the National Register. The agency shall ensure that such properties "as are listed or may be eligible for the National Register are managed and maintained in a way that considers the preservation of their historic, archeological, architectural, and cultural values in compliance with Section 106 of this Act. This section also directs that "preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning. (Emphasis added) The provisions of Section 110 are proactive, not reactive, and are reinforced in the Secretary of the Interior's Standards for Federal Agency Historic Preservation Programs.12 Specifically, Standards 2 and 3 state the following (emphasis added to underlined sections): • Standard 2. An agency provides for the timely identification and evaluation of historic properties under agency jurisdiction or control and/or subject to effect by agency actions. (Sec. 110(a)(2)(A), and sec. 112) • Standard 3. An agency nominates historic properties under the agency's jurisdiction or control to the National Register of Historic Places. (Sec. 110(a)(2)(A)). These responsibilities are acknowledged in the 1986 Monument RMP (p. 41), which states: The Bureau of Land Management is required to identify, evaluate, and protect cultural resources on public lands under its jurisdiction and to ensure the Bureau-initiated or Bureau-authorized actions do not inadvertently harm or destroy non-federal cultural resources. These requirements are mandated by the Antiquities Act of 1906, the Reservoir Salvage Act of 1960 as amended by P.L. 933-191, the National Environmental Policy Act of 1969, Executive Order 11593 (1971), the Archaeological Resources Protection Act of 1979, and Section 202 of the Federal Land Policy and Management Act of 1976. (Emphasis added) Similarly, on a project-by-project basis, the Advisory Council on Historic Preservation (ACHP) guidance on "Meeting the 'Reasonable and Good Faith' Identification Standard in Section 106 Review" 13 states: The regulations implementing Section 106 of the National Historic Preservation Act ("Protection of Historic Properties," 36 CFR Part 800) require federal agencies to identify historic properties within the Area of Potential Effects (APE) that may be affected by their undertakings. Section 800.4(b)(1) of these regulations states that federal agency officials shall make a "reasonable and good faith effort" to identify historic properties. (Emphasis added)	The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, and FLPMA, as well as other laws, in advance of the current project. This includes Section 110 of the NHPA. The BLM has applied and continues to follow its preservation program pursuant to Section 110 and the guidance of BLM's established 8100 series manuals and handbooks for managing cultural resources. The BLM is diligently and in good faith proceeding with NEPA, NHPA, and other regulatory processes as relates to the project. The BLM's current NEPA and NHPA review and analysis of the project further represent appropriate steps that the BLM is taking for historic preservation, including as relates to Minidoka NHS and WRC (see EIS Section 3.5). The BLM will continue to plan for and consult on the avoidance, minimization, and mitigation of adverse effects to historic properties from the project, including at Minidoka NHS.
9080-12	The Coalition to Protect America's National Parks	However, it appears that BLM has never given consideration to the potential eligibility of the 33,000-acre Minidoka WRC as a whole for listing on the NRHP. The 1986 Monument RMP made no mention of the site. Most recently, Appendix 9 of the DEIS, titled "Cultural Resources Potentially Affected by the Action Alternatives,"	The Minidoka WRC is addressed variously throughout EIS Section 3.5 (Cultural Resources), especially within Section 3.5.2, as well as within EIS Section 3.19 (Minidoka National Historic Site Interpretive Purpose). See response to comment 90809-11, above, and see response to comment 12859-2 (see in Table A-3h,

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		identifies over 5,600 individual “sites” that may or may not be eligible for listing on the NRHP. However, the WRC is notably missing from the appendix. In our experience, given the historical significance of the World War II era Minidoka WRC, the entire WRC is an obvious candidate for listing on the NRHP as either one or both of the following: • A “rural historic landscape,” which is described in National Register Bulletin 3014 as: The rural historic landscape is one of the categories of property qualifying for listing in the National Register as a historic site or district. For the purposes of the National Register, a rural historic landscape is defined as a geographical area that historically has been used by people, or shaped or modified by human activity, occupancy, or intervention, and that possesses a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features. Rural landscapes commonly reflect the day-to-day occupational activities of people engaged in traditional work such as mining, fishing, and various types of agriculture. Often, they have developed and evolved in response to both the forces of nature and the pragmatic need to make a living. Landscapes small in size and having no buildings or structures, such as an experimental orchard, are classified as sites. Most, however, being extensive in acreage and containing a number of buildings, sites, and structures--such as a ranch or farming community--are classified as historic districts. (Emphasis added) And/or as: • A “traditional cultural property,” which is described in National Register Bulletin 3815 as: The traditional cultural significance of a historic property [] is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. A traditional cultural property [] can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. (Emphasis added) Either of the above designations would be particularly appropriate for the Minidoka WRC in its entirety. The historical significance and potential eligibility of Minidoka WRC for listing on the NRHP has been known for decades. An initial 6-acre portion of the WRC was listed on the NRHP as long ago as 1979.16 The Nomination Form acknowledged that “[t]he property being nominated was only a small part of the Minidoka Relocation Center.” (Emphasis added) Over two decades later, on January 17, 2001, a larger 72.75 acres portion of Minidoka WRC was designated as Minidoka Internment National Monument making the site the 385th unit of the national park system. On May 8, 2008, the U.S. Congress expanded the park unit to 388 acres by passing Public Law 110-229, which changed the name to Minidoka National Historic Site and added the Bainbridge Island Japanese American Memorial in Washington State to the national park unit.	Environmental Justice and Socioeconomics) regarding BLM consideration of Minidoka WRC as a TCP and within an ACEC.
9080-13	The Coalition to Protect America’s National Parks	We understand that the Friends of Minidoka submitted a TCP study to BLM Idaho in December 2022 and BLM has acknowledged the proposal in the DEIS. However, our point is that it is an affirmative responsibility of the Bureau, not stakeholders, under Section 110 to “identify, evaluate, and protect cultural resources on public lands under its jurisdiction.” The fact remains that BLM Idaho has never considered the potential eligibility or submitted a nomination for the 33,000-acre WRC to be listed on the NRHP as required under Section 110 of the NHPA. That fact is confirmed by the notable absence of the 33,000-acre WRC in Appendix 9 of the DEIS. Instead, BLM is now entertaining a proposed action (Alternative B) in which “[t]he nearest wind turbine would be set back over 0.5 miles from the Minidoka NHS boundary and 1.7 miles from the Minidoka NHS Visitor Center (KOP 1) in the project layout design.” (DEIS p. 167) In addition, Alternative B’s “siting corridors would overlap 4,818 acres (8 square miles) of Minidoka WRC.” (DEIS p. 168) If BLM had instituted an effective “preservation program to identify, evaluate, nominate, and protect historic properties that are eligible for the National Register” as required un Section 110(a)(2), BLM would have known the WRC (not just the NHS) is potentially historically significant; and proactively determined whether it is eligible for listing on the NRHP. Depending upon that determination, BLM could or should have taken appropriate steps to manage and protect the WRC from the impacts of major development (e.g., through setbacks or exclusions zones) well before MVE submitted its current Project proposal. In our view, BLM’s failure to proactively address its Section 110 responsibilities is the root cause for the current situation.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) as well as to 9080-11 and 9080-12 above.
9080-14	The Coalition to Protect America’s National Parks	2. The DEIS description of the Traditional Cultural Property (TCP) proposed by Japanese- American groups is factually incorrect and any BLM decision based on that inaccuracy would have dire consequences for historic properties within the actual proposed TCP area – In December 2022, Algonquin Consultants, Inc. completed a TCP study titled “A Landscape of Isolation: A Traditional Cultural Property Study of the Minidoka Concentration Camp and its Viewsheds”19 that was submitted to BLM on behalf of the Friends of Minidoka.20 Whereas Minidoka WRC comprises approximately 33,000 acres of the Project area, the TCP proposal described in the study would be considerably larger than the just the footprint of the WRC. See Figure 25, page 40, in the study, which is shown below. [map] In contrast, p. 3-157 of the DEIS describes the TCP proposal as follows: Those Japanese Americans consulting on the project have asked that Minidoka WRC, inclusive of Minidoka NHS, be considered a TCP. As a result, the BLM is treating [only the] Minidoka WRC as a TCP, historically associated with the Japanese American communities. In accordance with National Register Bulletin 38 (NPS 1998), this Japanese American TCP would be NRHP-eligible because of its association with cultural practices and beliefs of a living community that a) are rooted in that community's history and b) are important in maintaining the continuing cultural identity of the community. Minidoka WRC retains the integrity of relationship between a property and the beliefs or practices that give it significance as a TCP. Minidoka WRC, as a TCP, retains its historical condition (e.g., setting, feeling, association), as expressed by the Japanese American communities and which could be impacted by the project. (Emphasis added) In brief, BLM’s description of the TCP proposal as being limited to the 33,000-acre footprint of the WRC is much smaller than what was actually indicated in the TCP study’s Figure 25 on page 40. As a result, BLM should revise its description of the proposed TCP in the DEIS so it accurately reflects the actual size of the TCP proposal as submitted. Any BLM decision about the	See responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns), as well as 9080-11 above.

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		Project or the TCP proposal itself should be based on the corrected description, not the faulty assumption that the proposed TCP would be limited to the footprint of the WRC. Lastly, the 1986 Monument Resources Management Plan (RMP)21 provides guidance to the SFO in the event that a project site is "determined to be of significant value; [or] eligible for or on the National Register of Historic Places." (Emphasis added) Specifically, p. 42 of the RMP states: Cultural resource values discovered in a proposed work area will be protected by adhering to the following methods: 1) Redesigning or relocating the project; 2) Salvaging, through scientific methods, the cultural resource values pursuant to the SHPO agreement; 3) Should the site be determined to be of significant value; eligible for or on the National Register of Historic Places; and/or the above mentioned methods are not considered adequate, the project will be abandoned." (Emphasis added) Given the likelihood that the proposed TCP is eligible for listing on the NRHP, BLM should "abandon the project" and deny MVE's ROW grant application.	
9080-17	The Coalition to Protect America's National Parks	As described in multiple places in the DEIS, BLM's primary "strategy" for protecting cultural resources, in general, is to focus on avoiding physical impacts to significant cultural sites by imposing a minimal "setback" (e.g., 0.5 miles from the boundary of Minidoka NHS or 1 mile from Wilson Butte Cave under Alternative B) for wind turbine installation. BLM's focus on avoiding primarily adverse physical effects to cultural sites in the Project area is ineffectual at protecting visual resources and related scenic values from the perspective of these important historical and cultural sites. The adverse effects to visual resources that are of concern are inherently non-physical effects, not physical. While minimal setbacks may prevent ground disturbance or other direct physical impacts in the immediate vicinity of (i.e., literally on top of) specific cultural resources, they offer little, if any, effective protection to the culturally significant landscape views as seen from Minidoka NHS, the WRC, or Wilson Butte Cave.	As described in Section 3.5 (Cultural Resources), the BLM consideration of alternatives providing increased distances for project turbines from those historic properties that would be adversely affected by visual impacts would be effective in reducing visual adverse effects, including for Minidoka NHS and Wilson Butte Cave. Additionally, see Cultural Resources section 3.5.5 (Non-physical Impacts) and Table App4-2 in EIS Appendix 4 regarding MVE's applicant-committed measures, required mitigation measures, and additional measures that would be implemented, supporting the avoidance and minimization of non-physical impacts to cultural resources. The avoidance, minimization, and mitigation of adverse effects to historic properties such as Minidoka NHS and Wilson Butte Cave are further being addressed by the BLM through a PA and Historic Properties Management Plan as stated in the EIS.
9080-43	The Coalition to Protect America's National Parks	C. Section 3.5.3 Minidoka War Relocation Center and Minidoka National Historic Site (pp. 3-154 thru 3-158) – See General Comment 2 above. By citing comments and concerns expressed by the Japanese American community and the National Park Service, this section of the DEIS contains a detailed description of the significance of Minidoka NHS and the importance of protecting not only its resources and values but also its isolated setting. However, p. 3-157 contains a factual inaccuracy related to the Japanese American community's request that the area be considered a Traditional Cultural Property (TCP) under the NHPA. The DEIS states that "[t]hose Japanese Americans consulting on the project have asked that Minidoka WRC, inclusive of Minidoka NHS, be considered a TCP. As a result, the BLM is treating Minidoka WRC as a TCP, historically associated with the Japanese American communities." (Emphasis added) The DEIS incorrectly states the proposed TCP would be limited to the footprint of the WRC, which comprises approximately 33,000 acres of the Project area. In reality, the proposed TCP would be considerably larger than the footprint of the WRC. See Figure 25, page 40, in the TCP study.54 As a result, we ask that BLM revise its description of the proposed TCP so that it accurately reflects the actual size of the TCP proposal as submitted. Any BLM decision about the project should be based on the corrected description, not the faulty assumption that the proposed TCP is limited to the footprint of the WRC.	See responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
9080-44	The Coalition to Protect America's National Parks	D. Section 3.5.4 Programmatic Agreement (pp. 3-158 and 3-159) – Page 3-158, near the bottom, contains a misleading statement that "[t]he BLM will prioritize avoidance of adverse effects to historic properties." (Emphasis added) As described throughout the impact analyses in Section 3.5, it is clear that BLM will only seek to "avoid" adverse physical effects to cultural resources; but not the many adverse effects that are non-physical, such as visual resource and noise impacts. For example, see Section 3.5.5.2.2 (pp. 3-167 and 3-168) regarding the impacts of Alternative B, the Proposed Action, where the DEIS states: Alternative B was sited to avoid physical effects to Minidoka NHS and Wilson Butte Cave, which are NRHP-listed cultural resources. The nearest wind turbine would be set back over 0.5 mile from the Minidoka NHS boundary and 1.7 miles from the Minidoka NHS Visitor Center (KOP 1) in the project layout design… Alternative B siting corridors would overlap 4,818 acres (8 square miles) of Minidoka WRC, which would result in a greater potential for physical impacts to cultural resources within and associated with Minidoka WRC than Alternative C, D, or E. (Emphasis added) Stating the obvious, while a 0.5 mile setback of multiple 740-ft tall wind turbines from the Minidoka NHS boundary may prevent physical effects within the NHS boundary, it does not "avoid" (or prevent) all adverse effects to the NHS. The proposed action, and the other action alternatives to a lesser extent, would undoubtedly result in significant, albeit non-physical, visual impacts. We cite this information here as an example of how inaccurate BLM's statement is about "prioritizing avoidance of adverse effects to historic properties" such as Minidoka NHS. We therefor ask that BLM revise its statement so that it accurately reflects what BLM is actually proposing to do in the DEIS, which is to avoid (only) adverse physical effects to historic properties while addressing nonphysical adverse effects to a lesser degree through some other form or level of mitigation.	The BLM has fully disclosed in the EIS (see Section 3.5) that the project is anticipated to have unavoidable visual adverse effects on historic properties due to the scale and nature of project elements. The BLM has analyzed a reasonable range of alternatives, including alternatives that would avoid adverse effects (physical and non-physical) to some historic properties in the area of potential effects for the project. As described in the FEIS, not all historic properties in the area of potential effect would be adversely affected. At historic properties that would be adversely affected, the adverse effect may be minimized at the historic property and/or require further mitigation depending on the action alternative (as analyzed in Section 3.5). The BLM does seek first to avoid, then to minimize, and where necessary mitigate adverse effects to historic properties.
9080-59	The Coalition to Protect America's National Parks	6. APPENDIX 9. Cultural Resources Potentially Affected by the Action Alternatives – The appendix identifies over 5,600 individual cultural "sites" that may or may not be eligible for listing on the NRHP. However, the 33,000-acre Minidoka War Relocation Center (WRC) is notably missing from the appendix. Given the well-known history of the WRC, a small portion of which was listed on the NRHP as long ago as 1979, BLM should have previously and proactively evaluated the eligibility of the entire WRC for listing on the NRHP in accordance the Secretary of the Interior's Standards for Federal Agency Historic Preservation Programs,72 specifically Standards 2 and 3. which state the following: • Standard 2. An agency provides for the timely identification and evaluation of historic properties under agency jurisdiction or control and/or subject to effect by agency actions. (Sec. 110(a)(2)(A), and sec. 112) • Standard 3. An agency nominates historic properties under the agency's jurisdiction or control to the	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and related responses to comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) cited there.

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		National Register of Historic Places. . (Sec. 110(a)(2)(A)). (Emphasis added) In addition, under Section 106 of the NHPA BLM is required to "identify historic properties within the Area of Potential Effects (APE) that may be affected by their undertakings." In this case, the undertaking is the LRWP. Yet the WRC is not on the list of potentially eligible sites identified in Appendix 9, despite the fact that the 33,000-acre WRC appears to be eligible for listing as either a "rural historic landscape," as described in National Register Bulletin 3074; or as a "traditional cultural property," as described in National Register Bulletin 38.75 BLM should have conducted such an evaluation of the WRC as part of this planning process, if not before. See General Comment 1 above for additional information on this concern.	
9325-2	Saya Moriyasu	This area is a very important site for US history and respecting the Shoshone nation. President Biden has promised to "advance equity and environmental justice." Minidoka needs to be protected as a place for healing and education. The 73,000 acres on BLM lands are public lands and should serve the greatest good for our citizens. Having 400 large turbines surrounding Minidoka is NOT acceptable.	The importance of the area to the Shoshone peoples and Tribal Nations is recognized in EIS Section 3.5, particularly EIS Section 3.5.1 (Native American Resources). Section 3.5 also considers potential project impacts to the cultural resource values of Minidoka NHS–associated sites and landscapes and how those impacts would be treated. Please note that not all portions of the geographic analysis areas in the EIS are public or BLM public lands and not all places in the analyses areas, as described in the EIS, would have views of turbines in their surroundings.

Environmental Justice and Socioeconomics

Table A-3h. Environmental Justice and Socioeconomics

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1042-16	WildLands Defense	[How much will it cost for the wind developer to buy out all homes and private property adversely impacted by the visual effects and/or noise of the turbines? This amount must be set aside in a bond for the project. Why isn't this major industrial intrusion into neighboring areas considered a "taking"].	See response to comment 13006-35 (see in Table A-3h, Environmental Justice and Socioeconomics).
1042-31	WildLands Defense	Magic Valley Energy's preliminary estimates from 2021 say that the construction phase will generate $80 million in tax revenue for the surrounding taxing districts and, once operational, revenues of nearly $4 million annually for schools, roads, cemeteries and fire districts in Jerome, Lincoln and Minidoka counties. [What is the economic value of all the NEGATIVE effects of the project? How much will home and property values be lowered, recreation opportunities lost? What will be the costs of dealing with health harms of industrial wind and turbine noise and other assaults on human mental and physical health?	Quantifying the monetary costs and benefits for all resource effects (e.g., negative health effects or effects on community services) is not feasible, nor is it required for NEPA. The BLM analyzes the impacts associated with the alternatives using the best available information and most appropriate impact indicators within the context of each resource chapter, which is typically not monetized estimates of benefits or costs. Additionally, CEQ NEPA regulations at 40 CFR 1502, Subpart 1502.22, specifically provide that BLM need not display the weighing of the merits and drawbacks of the various alternatives in a monetary cost-benefit analysis and should not do so when there are important qualitative considerations. In accordance with CEQ's NEPA regulations, the BLM analyzed the potential effects of the Proposed Action and alternatives on several different resource topics identified through internal and external scoping including but not limited to natural resources, cultural and historic sources, and socioeconomics. With respect to the economy, the BLM analyzed the potential economic effects of the project in EIS Section 3.6 (Environmental Justice and Socioeconomics). The BLM will make a reasoned choice among the alternatives based on the EIS analysis for all resources, and the BLM cannot determine significance for a proposed action based on economic effects alone.
10500-1	Nancy	This will not bring jobs to the area. People will come to install them and then will leave. This will not grow the economy.	See response to comment 11873-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
11204-16	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	C. The 2022 Comments discuss financial mitigation and related compensation values that MVE should pay to Permittees should: BLM consider, assess, and/or implement any decrease in the Permitted Use AUMs within the Star Lake Allotment during any phase of the wind project due in whole or part to the effects of the wind project; AUMs be lost or displaced during the construction phases of the proposed Project; AUMs be disrupted or eliminated during the postconstruction rehabilitation and/or operation phases of the proposed Project; and, any fire event occur due to Project-related activities during the construction and/or operation phases (including the rehabilitation phase). See 2022 Comments, pgs. 10-11. The DEIS does not address financial mitigation in terms of specific compensation values related to these issues. See also the sub-section above. Permittees stand by their 2022 Comments that should BLM consider, assess, and/or implement any decrease in the Permitted Use AUMs within the Star Lake Allotment during any phase of the Project due in whole or part to the effects of the Project, MVE should pay compensation to the Permittees in an amount that is 2.5 times the Full Market Value (FMV) of each decreased AUM upon implementation of any such decrease, with the FMV determined by mutual agreement between MVE and the Permittees, or in the alternative, by binding, arbitration, not subject to appeal / challenge by any party. See 2022 Comments, pg. 10. Permittees stand by their 2022 Comments that should their AUMs be temporarily lost or displaced, in whole or in	See response to comment 11204-38 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		part, during the construction phases of the proposed Project, MVE should pay compensation to the Permittees in an amount of $100 per AUM annually for each AUM temporarily lost or displaced during the construction phases. Likewise, should the Permittees' AUMs be permanently disrupted or eliminated during the postconstruction rehabilitation and/or operation phases of the proposed Project, MVE should pay compensation to the Permittees in an amount of $100 per AUM annually for each AUM that is permanently disrupted or eliminated due to Project-related activities. See 2022 Comments, pg.10. However, the compensation values discussed in the 2022 Comments and summarized above need to be subject to inflation adjustments for implementation in future years. U.S. inflation rates for the 10-year period from 2013 through 2022 averaged 2.63% with significantly higher inflation rates in recent years, i.e., 7% in 2021 and 6.5% in 2022 (see Attachment #9, Chart: United States Annual Inflation Rates (2013 to 2023)). Thus, the Permittees contend that it is necessary and reasonable to apply inflation adjustments to the 2022 compensation values discussed above based upon the actual annual inflation rates published at www.usinflationcalculator.com/inflation/current-inflation-rates for each year after 2022 (or in the alternative, based upon a projected average annual inflation rate of 4.5%). This inflation adjustment is particularly warranted given the timespan of this project could be 84 years, according to the DEIS at page 3-57. Finally, the Permittees stand by their 2022 Comments that should any fire event occur due to Project- related activities, MVE should pay compensation to the Permittees for any fire related losses incurred.9	
11204-35	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	X. Need to evaluate socio-economic losses due to impacts on local ranching operations. See 2021 Comments, pg. 16. The 2021 Comments expressed comments at pg. 16 that the proposed Project would result in socio-economic losses due to impacts on local ranching operations related to: (1) the gross annual income generated from the Permittees to support local, regional, and national economies; (2) the gross annual property taxes paid by the Permittees based upon their base properties and upon other private land; and (3) the workforce employed by the Permittees (at least 57 full-time and parttime employees annually).	See response to comment 11204-38 (see in Table A-3h, Environmental Justice and Socioeconomics).
11204-37	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	B. Socio-economic Damages Attributed to the Proposed Project Summary: The DEIS downplays or ignores potential socio-economic damages to the local economy from the proposed Project In contrast, the DEIS appears to trivialize and downplay the potential socio-economic damages that would result from the proposed Project by reporting nominally small percentage changes and by avoiding attaching any dollar values to the potential damages. For example, DEIS Table ES-2 (Summary of Project Impacts at pg. ES-xix) concludes that "AUM reductions for individual grazing allotments would range from 0% to 34.9% of the active AUMs" during construction, and "would range from 0% to 1.3% of the active AUMs" during operation. This summary goes on to conclude that since "some areas would not be reclaimed or have limited reclamation potential, an estimated 231 AUMs (0.4% of the active AUMs) would be permanently lost." DEIS, pg. ES-xix. These claims appear to be at odds with the DEIS reports elsewhere. The DEIS further trivializes the potential socio-economic damages with respect to the livestock grazing sector due to these AUM reductions by simply concluding: Reduced income, profitability, and economic stability for grazing permittees in nine grazing allotments due to temporary and long term animal unit month (AUM) reductions could affect the broader livestock grazing community. DEIS, Table ES-2, pg. ES-xix. The DEIS reports other potential negative socio-economic impacts in even more vague terms without attaching any numeric values whatsoever. For example, with respect to potential impacts of the proposed Project to property values, the DEIS concludes: Potential decrease in residential property value due to the proximity and visibility of wind turbines for residences in the immediate foreground (0–2 miles) and foreground (2–10 miles) of the siting corridors; however, the likelihood or degree to which this may occur cannot be predicted with any certainty. DEIS, Table ES-2, pg. ES-xix. Because the DEIS reports the purported socio-economic benefits of the Project in terms of the dollar values that such benefits are expected to generate, but fails to report the potential socio-economic damages in terms of dollar values lost, it is impossible to formulate an overall conclusion regarding the net socio-economic impact of any of the action alternatives in comparison to one another, or in comparison to the no action alternative. This deficiency in the DEIS needs to be corrected.	See response to comment 11204-38 (see in Table A-3h, Environmental Justice and Socioeconomics).
11204-38	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	C. Socio-economic Analysis Related to the Ranching/Farming Sector Permittees anticipated that the proposed Project would impact the socio-economic situation of the ranching/farming sector by changing: • the gross annual income generated from this sector to support local, regional, and national economies; • the gross annual property taxes paid by this sector based upon their base properties and upon other private land; and • the workforce employed by this sector. (2021 Comments, pg. 16). In contrast, the DEIS essentially only evaluates impacts to the socio-economic situation of the ranching / farming sector based upon the potential of the proposed Project to temporarily reduce or permanently eliminate livestock AUMs and thereby alter the annual income generated from this sector. The DEIS fails to attach a dollar value to such potential AUM reductions and permanent losses. The DEIS reports extensively upon the new tax revenues that are projected to be generated by the proposed Project, but fails to address any loss of tax revenues from other sectors that may be impacted by the Project. It seems unrealistic to assume that the Project will have no impact on tax revenues generated by other sectors, including the ranching/farming sector. Socio-economic Analysis Related to Property Values and Property Taxes The DEIS acknowledges that the proposed Project is likely to reduce property values in the surrounding areas, but fails to put any dollar value on these reductions (due to purported uncertainty). Similarly, the DEIS fails to project how such property value reductions might impact long-term property taxes in the region. To this end, what is damning as to each of these points is that, while acknowledging the likelihood of reductions in property values, the DEIS fails to consider and assess how it will require the applicant to mitigate such reductions and related losses. The	EIS Section 3.9 (Livestock) has been revised to include additional context and discussion regarding the anticipated AUM reductions for individual permittees and how they would affect those permittee's overall grazing operations in terms of available forage and anticipated changes to stocking rates and AUM active usage. The project-related effects to AUMs and forage availability are not expected to warrant any permit reductions, which are outside the scope of this NEPA analysis. As stated in Section 3.9.1.2.2, project-related effects to livestock grazing would be minimized and mitigated through various applicant-committed measures and mitigation required by BLM policy (see Tables App4-2 and App4-3 in EIS Appendix 4), as well as project-specific mitigation measures that the BLM would apply to the action alternatives related to invasive species control and prevention. The BLM is not required to incorporate compensatory mitigation measures (e.g., sch as payments to permittees) if other forms of mitigation can sufficiently bring impacts below the level of significance. Also see responses to comments 1042-31 and 11873-6 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		DEIS needs to provide mitigation to compensate the Permittees for any reductions to their property values that result from Project-related infrastructure and activities should the proposed Project be authorized and they sell such property thereafter. The DEIS also needs to provide mitigation that MVE will be required to compensate the Permittees upon such property sale(s) for any incremental costs for property appraisal(s) that are incurred to establish the reduction in property value attributable to authorization (and subsequent implementation) of the proposed Project compared to property values that would have been realized in the absence of the Project. Socio-economic Analysis Related to Workforce Employment With respect to workforce employment, the DEIS reports extensively upon new jobs that would be created during construction, operation, and decommissioning of the proposed Project, but fails to report upon jobs that would potentially be lost in other sectors due to the proposed Project. Instead, the DEIS implies that no such job losses in other sectors would occur, claiming that because the proposed Project requires "a relatively specialized construction workforce and to provide a conservative assessment of employment and related impacts, this analysis assumed all workers would be non-local, and unemployment in the analysis area would remain unchanged" (DEIS, pg. 3-220, bold emphasis added). DEIS Table 3.6-5 also concludes that "unemployment in the analysis area would remain unchanged" under each of the action alternatives (DEIS, pg. 3-221). To the extent the DEIS anticipates that there will be temporary AUM reductions and permanent AUM eliminations associated with each of the action alternatives for the proposed Project, it is reasonable to anticipate that there will be commensurate temporary reductions or permanent eliminations within the workforce employed to manage the livestock that utilize such AUMs. Thus, it is erroneous for the DEIS to conclude that "unemployment in the analysis area would remain unchanged" under the action alternatives evaluated for the Project. While such changes in workforce employment may not be extensive enough to change the regional unemployment rate, local unemployment within the analysis area would certainly change. The DEIS needs to be consider and assess the impacts to the socio-economic situation of the ranching / farming sector based not only upon the potential of the proposed Project to change the gross annual income generated from this sector (at local, regional, and national scales) due to AUM losses, but upon the potential to change the gross annual property taxes paid by this sector and the workforce employed by this sector.	
11204-39	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	D. Social and Cultural Impacts Related to the Ranching/Farming Sector The social implications of the proposed Project may be as serious or more serious to the socio-economic situation in the region than are the economic implications. The DEIS acknowledges that the ranching/farming sector is a vital component of the local and regional social and cultural fabric, stating: Livestock grazing plays an important economic and social role in southern Idaho. The livestock industry represents a core sector of commerce for the region and many families and communities depend on livestock grazing for their livelihoods (Lewin et al. 2019). These families and communities have strong ties to the livestock industry and have identified with the tradition, land use, and history of grazing in the area since the late 1860s. The livestock industry not only contributes to the region's economic stability but also the rural lifestyle for local residents and small community sense of place (Lewin et al. 2019). Moreover, the social networks of southern Idaho communities are often closely connected with grazing and agricultural life, and the economic well-being of the grazing community is of central importance to some rural southern Idaho towns. Rimbey et al. (1999) and Wulfhorst et. al. (2006) found that in southern Idaho communities, livestock grazing is an essential and stabilizing social and economic contributor, which allows community members to feel connected to the land, to each other, and to the ranching community. DEIS, pg. 3-230. While the DEIS statement quoted above recognizes that the ranching/farming community is not only a "core sector of commerce" in southern Idaho, but also plays a critical role in the region's tradition, rural lifestyle, small community sense of place, and social networks, the DEIS immediately thereafter focuses its socio-economic analysis regarding the livestock grazing sector on the temporary and long-term or permanent AUM reductions that the proposed Project would impose on the economic conditions associated with the nine grazing allotments which intersect the siting corridors of the proposed Project (DEIS, pg. 3-230). Once again, the DEIS conducts its subsequent socio-economic analysis in terms of magnitude (absolute number) or percentage of AUMs reduced and fails to put any dollar values on such reductions. The DIES utterly fails to address in its subsequent analyses the social/cultural impacts to the region's tradition, rural lifestyle, small community sense of place, and social networks associated with the ranching/farming sector that were identified as "essential and stabilizing social…" contributors by the DEIS at pg. 3-230. The DEIS needs to consider and assess the social / cultural impacts of the proposed Project to the region's tradition, rural lifestyle, small community sense of place, and social networks associated with the ranching / farming sector that were identified as "essential and stabilizing social" contributors by the DEIS at pg. 3-230.	EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics) includes discussion of how the existing landscape of the analysis area contributes to the livestock grazing communities' lifestyle and sense of place, and how the project would affect the landscape and sense of place.
11204-41	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The DEIS utterly fails to address any of the social or cultural impacts that result from the Sheep AUM reductions associated with the proposed Project. As was documented in relation to the broader ranching / farming sector, the sheep herding sector plays a noteworthy role in the region's tradition, rural lifestyle, small community sense of place, and social networks. Evaluation of the social, cultural, and economic impacts associated with reductions to Sheep AUMs by implementation of the proposed Project is particularly important because they often alter the socio-economic climate of environmental justice communities (low-income and minority populations that immigrate to the United States as sheep herders). The DEIS needs to be consider and assess the negative impacts, including related mitigation, to the social and cultural setting for the environmental justice communities that would result from the sheep AUM reductions under the proposed Project.	EIS Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) have been revised to include additional details concerning existing and historic use of the analysis area by sheep herders, and potential effects of the project on sheep herding communities. Also see response to comment 11204-39 (see in Table A-3h, Environmental Justice and Socioeconomics).
11204-42	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey,	F. Socio-economic Concerns and Damages Reported by Other Commentors Many of the concerns and potential damages associated with the proposed Project reported by other commentors are substantially socio-economic factors or are closely related thereto. For example, comments regarding concerns and potential damages	The EIS analyzes potential effects to all of the resources mentioned by the commenter, including socioeconomics, air quality and climate, wildlife and habitat, recreation, land use, cultural resources, transportation, and visual resources. The comment does not identify any deficiencies in these EIS analyses.

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	Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	associated with: air quality (as it affects visibility); plant, animal, and wildlife populations and habitats (as they affect recreation, hunting, open space and solitude, scientific interests, commodity interests etc.); climate; cultural resources; environmental justice communities; fire and fuels management (as it affects multiple-use activities by every social sector); land use and realty; paleontological resources (as they affect recreational, commodity, and scientific interests); recreation; transportation (as it affects recreation, hunting, open space and solitude, scientific interests, commodity interests etc.); and, visual resources are largely expressed because they would potentially alter social or cultural values within the Project area and/or surrounding area significantly. Concerns and potential damages associated with the proposed Project reported by others include substantial socio-economic elements, including comments, news releases, and resolutions listed below: • Federal Aviation Administration, S.W. Region Office, Notice of Preliminary Findings, dated May 21, 2021, wherein "Initial findings of this [aeronautical] study indicate that the structure as described exceeds obstruction standards and/or would have an adverse physical or electromagnetic interference effect upon navigable airspace or air navigation facilities. Pending resolution of the issues described below, the structure is presumed to be a hazard to air navigation." Under information and belief, such findings were not resolved. See Footnote 27 herein. • Coalition to Protect America's National Parks, Scoping Comments on Lava Ridge Wind Project, DOI-BLM-ID-T030-2021-0015-EIS dated October 20, 2021. • Office of Governor Brad Little, Office of Lieutenant Governor Scott Bedke, Office of U.S. Senator Mike Crapo, Office of U.S. Senator Jim Risch, Office of Congressman Mike Simpson, Joint Letter to Idaho State Director Karen Kelleher dated February 6, 2023. • Capital Press, Idaho Leaders raise concerns about Lava Ridge wind project by Brad Carlson, dated February 10, 2023. • Idaho Statesman, Groups fighting 'invasive' wind farm project near Idaho incarceration camp site by Shaun Goodwin, dated February 20, 2023; and, • Idaho Statesman, Lava Ridge Wind Project doesn't uphold multiple-use values Opinion by John Arkoosh, dated February 27, 2023. • Idaho Transportation Department, Division of Aeronautics, dated March 23, 2023, wherein "The Division of Aeronautics has determined the windmills to be an aviation hazard contrary to public interest." • House Concurrent Resolution 4 regarding "LAVA RIDGE – States findings of the Legislature, expresses concern over the proposed Lava Ridge Project, and supports a no- build option", adopted by the House of Representatives, Legislature of the State of Idaho, on March 28, 2023, and Delivered to the Secretary of State on March 30, 2023. The DEIS needs to be consider and assess these negative impacts to the social and cultural setting and other potential impacts that would result from the proposed Project brought forth by other comments and news releases identified herein.	
11208-2	Mike Miller	On page 3-197 of the EIS, the BLM addresses the potential impacts to the low income and minority populations, Yet, I can not find any information where the EIS is available in Spanish, or any other language, other than English. The minority population should have a voice in this as well, because they will be impacted as well. Shame on you BLM for not making this readily accessible to the Hispanic community!	See response to comment 11982-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11315-2	Karen Atkinson	Environmental Justice: The DEIS, Section 3.6.2.12 Dispersed Environmental Justice Community, does not adequately describe the impact of the industrial scale wind project on Alaska Native survivors who were wrongfully incarcerated and their descendants. Please describe Alaska Natives as a distinct population because of their unique experiences before, during and after the incarceration. Table 3.6-2 Summary of Impacts to Dispersed Environmental Justice Communities does not list Alaska Natives or Japanese Alaskans.	The description of Minidoka NHS and WRC included in EIS Sections 3.5 and 3.6 has been revised to properly reflect the different types of communities that were incarcerated at the site. Although Alaska Natives were not directly among interested parties or stakeholders identified during initial project scoping or through the NHPA Section 106 consultation process, the BLM has received draft EIS comments regarding their inclusion as incarcerees at Minidoka and is assessing outreach efforts to these peoples.
11372-2	Jamie Kohtz	The Valley School District is 47% economically disadvantaged and 51% minority. The Dietrich School District is 58% economically disadvantaged and 25% minority. Shoshone School district is 73% economically disadvantaged and 50% minority. These families work on the local farms and ranches. The benefits have been discussed on the economical impact this will have in the area, but not for the people who live and work here. Many families will suffer, and jobs will be lost. The economically disadvantaged living in the surrounding areas from the project could face many unknown costs, and cannot afford lost wages. The EIS states there is a potential decrease in residential property value but the likelihood or degree cannot be predicted. Our family has owned homes and farms here for 70 years. We have turned sagebrush into valuable farmland and it is "uncertain" as to how this will affect our property value. The study mentioned in the EIS in England and Wales found a 6%-12% decrease in property value in view of turbines. My entire view from my porch will be wind turbines. I cannot afford a 6-12% decrease in my property value.	EIS Section 3.6 evaluates potential socioeconomic effects of the project on people living and working within the tri-county analysis area. This includes people who live in the immediate project area as well as those living further removed, but still within the tri-county analysis area. Also see response to comment 13006-35 (see in Table A-3h, Environmental Justice and Socioeconomics).
11411-3	Rayma Cates	Electricity generation requires large transmission lines. Large transmission lines cause problems for farmers. There is a lot of testimony from farmers, condemning the effect of transmission lines on GPS guidance systems. I have a farm in Power County. Myself and other Power County farmers and County Commissioners have been fighting the placement of the Gateway West Powerline for years. Land owners have no say in where transmission lines are placed. Idaho farmers will not be appropriately compensated for the transmission lines which will undoubtedly be placed on their farm fields.	See response to comment 6913-4 (see in Table A-3o. Land Use and Realty, including Aviation).
11433-1	Tom Zuiderveld	This also increases the cost of utilities to the people of Idaho as Idaho Power has to create new sources of reliable electricity for when the wind mills are not producing power, mandated by the federal government.	See response to comment 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11442-3	Kalena Kendell, William Kendell	LS Power/Magic Valley Energy offers as a reason to move forward with this project the economic value this project will bring to the Magic Valley through job opportunities and economic stimulation. Idaho has one of the strongest economies in the nation. Idaho's economy ranks in the top five of all 50 states, and has been for years. Additional jobs is not an issue Idaho is currently struggling with. Currently, Idaho needs additional workers. Many	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		of the jobs Lava Ridge will create will be filled by workers from out of state, further exacerbating the housing shortage Idaho is experiencing in the Magic Valley.	
11481-5	Idaho Wool Growers Association	In the peripheral there are also concerns about how the project will impact the local communities and economies. With such a need for employees for the project this will either remove employees from the agricultural and agribusiness communities or it will create an intense need for housing and amenities in the area for new workers.	See responses to comments 1689-8 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
11491-20	Dean Dimond; Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: [...] 15. Need analysis of adverse economic impacts to counties, communities, tribes, and state, 16. Need up to date economic impact analysis with cost /benefit to taxpayer in federal PILT and other payments to counties, [...]	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
11491-31	Dean Dimond; Jennie Bateman	16. Need up to date economic impact analysis with cost /benefit to taxpayer in federal PILT and other payments to counties, 17. Overall liability and costs if developer fails to produce power or abandons the project to US Gov, 18. Need updated local workforce, ag and other business impacts, 19. Need detailed county law enforcement, search and rescue personnel review and analysis of viability.	Refer to EIS Sections 3.6.2 (Community Services, Employment, and Housing Availability), 3.6.3 (Local and Regional Economy), and 3.9.1 (Grazing Allotments and Range Socioeconomics) for a detailed discussion of tax revenues, impacts to the economy and workforce, and impacts to emergency services.
11495-1	Jennie Bateman	I am writing to express my concern about the lack of a cost-benefit analysis for community members in Minidoka and other affected counties in the DEIS regarding the Lava Ridge Wind Farm project. While wind farms may bring some benefits, such as energy and job opportunities, it is important to consider the potential costs and impacts on local communities. Studies from other wind farms have shown that community members can experience negative impacts, such as decreased property values, noise pollution, health concerns for humans and animals, obscured scenic views, and depleted county resources. It is crucial to conduct a cost-benefit analysis to assess these and other impacts and ensure that the benefits of the wind farm outweigh the costs for local residents. One study that highlights the importance of a cost-benefit analysis is the analysis of the Lompoc Wind Energy Project in California. This study found that while the wind farm created jobs and provided energy, it also had negative impacts on property values and scenic views. The study concluded that a comprehensive cost-benefit analysis was necessary to ensure that the benefits of the wind farm outweighed the costs for the community. Another study that underscores the need for a cost-benefit analysis is the analysis of the Blue Sky Green Field Wind Energy Center in Wisconsin. This study found that while the wind farm provided economic benefits to the community, such as tax revenues and job creation, it also had negative impacts on property values and noise levels. The study concluded that a comprehensive cost-benefit analysis was necessary to ensure that the community was adequately compensated for the negative impacts of the wind farm. Given these examples and the potential impacts of the Lava Ridge Wind Farm on Minidoka County, I urge you to conduct a comprehensive cost-benefit analysis to assess the potential costs and benefits for local residents. This analysis should include an evaluation of the impacts on property values, noise levels, human and animal health, scenic views, and the use of county resources as well as an assessment of the economic benefits and job opportunities created by the wind farm. Thank you for your consideration of this important issue.	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
11525-4	Erin Schmith	In the section of chapter 3.6 that talks about the Environmental Justice impacts of Alterative C, the report says that this alternative would "would minimize and avoid visual, noise, and traffic effects," but then goes on to say that they would not be eliminated altogether. This doesn't feel accurate, as it clearly says that the Alternative will not completely avoid these adverse effects to visitors of Minidoka. The proposed alternative may reduce some of the effects, but I do not agree with the characterization that it would minimize them.	The EIS uses the term *minimize* as directed in 40 CFR 1508.1(s)(2), which defines mitigation and states specifically that mitigation includes “minimizing impacts by limiting the degree or magnitude of the action and its implementation”.
11533-4	Rebecca Loomis	This proposal is premature to destroy a once protected area to advance the green energy climate change policies under this administration. The stated outcomes are mere speculation and can not be confirmed other than the number of wind turbines erected. There is no substantial data on energy produced and the true cost benefit analysis of any of these projects.	The analysis in the EIS is based on the best publicly available data. The energy that would be produced by the project under each action alternative is provided in Table 2.4-1 in EIS Section 2.4 (Alternative B [Proposed Action]). The impact analyses in EIS Chapter 3 (Affected Environment and Impacts) consider both beneficial and adverse effects from the project. Economic impacts of the project are analyzed in detail in EIS Section 3.6 (Environmental Justice and Socioeconomics).
11533-7	Rebecca Loomis	Why not conduct a thorough project that not only identifies the pros but also the cons. Only then can a reasonable decision be made rather than only doing part of a study and say it's good to go. An example has been the graveyards for the turbines. They are just now starting to investigate ways to handle the waste. There must be a cost benefit analysis to this project as well- how much does it cost to contract the manufacturing of these turbines (is China producing them? are supporting China not US manufacturing?), supporting structures and when is the cost recouped if at all. It can't be just that it is best for the environment, it must be backed by facts.	See response to comment 11533-4 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding analysis methodology and economic impacts and to response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding turbine disposal.
11535-47	Steven Andersen	The DEIS fails to adequately analyze environmental justice impacts under the proposed action and alternatives. Title VI prohibits recipients of federal financial assistance from discriminating on the basis of race or national origin in their programs. The agency must ensure that all programs receiving Federal financial assistance that affect human health or the environment do not directly or through contractual or other arrangements, use criteria, methods or practices that discriminate on the basis or race, color or national origin. LS Power/MVE is a recipient of federal financing, and this project, should not be approved based on violation of Title VI alone. The agency's	See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		analysis of environmental justice populations was wholly inadequate and inconsistent with a handbook drafted by the BLM's Environmental Justice Working Group and the BLM's Socioeconomics Team from identification of impacted populations to outreach and involvement to mitigation efforts.	
11535-48	Steven Andersen	Readily available demographic information on minority and low-income populations should have been analyzed in order to identify populations at risk (PAR) and the disproportionate risk to those PAR consistent with E.O. 12898 and federal direction to each agency to "analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority and low-income communities, when such analysis is required by [NEPA]." Id.165 The DEIS provides a generalized recitation of census block groups and admittedly improperly based its poverty analysis on an incorrect threshold for federal poverty at 50% of what it should have been, because the agency ran out of time to redo it (see FN 14 of DEIS). The BLM's handbook states that the Census data can be out of date and there needs to be an in-depth and thoughtful analysis at a local level of the concentration of minority and low-income populations beyond what is simply reflected in census data. This never occurred. There should have been an effort to identify local and displaced environmental justice ("EJ") populations at the county and community level, consistent with BLM handbook direction. Id. at 10. Instead, in the DEIS, there is a list of what the BLM plans on doing in the future, including steps it plans to take to comply with NGPA and Section 106 Executive Order 12898. But Executive Order 12898 directed federal agencies to proactively identify and address disproportionately high and adverse human health and environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law, to develop a strategy for implementing environmental justice and to promote nondiscrimination in federal programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation.	See response to comment 12398-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11535-49	Steven Andersen	A special study into the environmental justice impacts of this project (including cumulative impacts) should have been conducted to inform scoping, facilitate public participation by marginalized communities and thoughtful analysis in the DEIS. Executive Order 14008 is intended to address climate change with "clean energy technologies" while delivering environmental justice in communities across America – not as some reactive box-checking exercise. Rather, Executive Order 14008 has a stated policy of securing environmental justice and economic opportunity for disadvantaged communities that have been historically marginalized and overburdened by pollution and underinvestment in housing, transportation, water and wastewater infrastructure, and health care. This proposal is a text-book example of a lucrative project intended to profit a private entity at the expense of local populations, which have been subject to historic marginalization. It is everything environmental justice initiatives are aimed at preventing. It proposes a project with a widespread footprint throughout rural Idaho (without due regard for a sacred National Historic Site) whose negative impacts will be borne by the nearby inhabitants, who are minorities, indigenous communities, persons of Japanese ancestry, and low-income communities - with little resources to defend against the external pressure being imposed by a goliath private developer from New York. They won't obtain any benefits from the alleged "green energy" provided by this project. It will be sold on the OEM to the highest bidder, which will in all likelihood, not be an Idaho utility. It will serve only to meet arbitrary federal initiatives and line the pockets of private developers, who are already reaping the benefits of federal incentives funded by taxpayers. This is eerily similar to scars in our country's history where disadvantaged communities were likewise pressured off their lands or otherwise displaced. In the post-colonial period, former colonies were used as dumping grounds for the North and for the trade in harmful and toxic products and African countries were used as sites for depositing harmful waste. We need not look any further than the very land the project intends to impede upon for a reminder of the government's failure to safeguard its citizens, thereby alienating them from the rights and territories linked to their identity and culture. This is contrary to the very principles of environmental justice, which the federal government has declared a "core priority" and part of the mission of every federal agency.	CEQ has not issued any guidance to explain how federal agencies should incorporate EO 13985, 14008, or 14096 into their NEPA analyses. Therefore, the BLM currently implements environmental justice analyses in accordance with EO 12898 and the BLM's environmental justice guidance document (IM 2022-059), which was issued in September 2022. Revisions have been made to EIS Section 3.6.1 (Environmental Justice Communities) to incorporate updated definitions of low-income and minority populations. With these revisions made, the EIS is in full compliance with EO 12898 and IM 2022-059. EO 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All) was enacted on April 21, 2023, to complement EO 12898. Until further guidance is issued on how to implement EO 14096, the BLM continues to implement EO 12898. Further, the BLM has closely reviewed the most recent EOs, and the EIS analysis is in compliance with the general themes and concepts presented in these EOs.
11535-50	Steven Andersen	Procedurally, there was little effort to make impacted minority communities even aware of the proposed project, let alone seek their meaningful participation in NEPA or account for the project's impacts in minority communities. The DEIS fails to demonstrate that real efforts were made to proactively locate, reach, and inform geographically dispersed environmental justice populations, like Alaska Natives and Japanese Americans. None of this occurred until late in the process, and efforts were weak, at best. With reference to the Hispanic population, a few preliminary handouts were in Spanish, evidencing the agency's knowledge of an impacted community that could only be reached in that language. Yet, very few hard copies of the DEIS were made available – and those made available were often incomplete (missing appendices). We are unaware of any hard copies or electronic copies of the DEIS made available in any language other than English despite the agency's apparent knowledge of the need for Spanish materials as well as Census data confirming large minority populations in the impacted region. The Federal government has recognized that failure to ensure that persons with limited English proficiency "can effectively participate in" such programs may violate Title VI found at 40 C.F.R. Part 7. 166 The BLM is advised, with reference to reaching minority populations in the NEPA process, as follows: • Language can pose a barrier. Identify needs early in the process and budget accordingly, including: translating outreach materials and providing an interpreter at public meetings.167 • Post notices (in the appropriate language) at facilities widely used by community members, such as churches, recreation centers, or bars. (Announcements made through mailing lists, English language newspapers, and BLM websites may not reach some EJ populations.) Id. • If you know or suspect that an EJ population could be affected by the BLM's actions, or if members of a minority or low-income community contact the BLM to tell us so, look into it further. Use your own and others' local knowledge to identify groups of minority or low income people who may not	The BLM performed meaningful outreach and engagement with environmental justice communities in accordance with EO 12898 and BLM's IM 2022-059. As described in EIS Appendix 10 in the Agency and Public Involvement section, public engagement efforts for the EIS have included a 60-day public scoping period, two virtual public scoping meetings, posting two newsletters (in Sept. and Dec. 2022) on the project website to keep stakeholders informed as the BLM developed the draft EIS, a 60-day public comment period, one virtual orientation meeting at the beginning of the draft EIS comment period, and seven open-house meetings during the draft EIS comment period (2 virtual and 5 in-person). In addition, to accommodate access and inclusion, hardcopies of the draft EIS were provided at eight locations or upon request, and notices for the public scoping and public comment periods were published in both English and Spanish (see response to comments 11982-1 in Table A-3h, Environmental Justice and Socioeconomics). As stated in EIS Appendix 10 in the Agency and Public Involvement section, due to the high proportion of scoping interest regarding the potential for impacts to Minidoka WRC and Minidoka NHS, the BLM and the Office of Collaborative Action and Dispute Resolution implemented proactive approaches to solicit input on the draft EIS from interested parties, including members of the Japanese American community. These parties are also included in Section 106 consultation, as described in the Consultation and Coordination section in EIS Appendix 10. Input received from Minidoka NHS and WRC–interested parties have been documented in a report and incorporated into the EIS analysis for environmental justice (Section 3.6) and cultural resources (Section 3.5). As described in Section 3.5 (Cultural Resources) and EIS Appendix 10 (Consultation and Coordination section), the BLM is engaging with Native American Tribal populations, individuals representative of the Japanese American parties, and other qualified parties under the NHPA Section 106 process (36 CFR 800.2). In addition, the BLM is engaging with Native American Tribal

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		appear in the data or who don't live in the same place but could be affected by your project/plan. Id. at 10 (emphasis added). When our law firm heard of concerns from clients that copies of the DEIS were not being made available in other languages, we made the BLM Project Manager aware of our concerns, specifically articulating our concern that minority communities were not receiving copies in their language, and those minority communities remained, by and large, uninformed of the project. On that basis, we sought an extension. We didn't receive any follow up questions about our concerns that EJ populations affected by the BLM's actions were uninformed, and as far as we know, nobody looked into it further. We were denied our request, without explanation.168 The top six Idaho counties by total Hispanic population include Minidoka, Jerome and Twin Falls.169 Rupert, Burley and Jerome, are in the top four Idaho cities with the largest Idaho Hispanic population in 2023, and yet, it doesn't appear any meaningful efforts were made to inform and involve Spanish-speaking communities, including making a copy of the DEIS available in Spanish. In recent days, an article by the Associated Press discussed the lack of drafts in Spanish despite the large Spanish-speaking population in the area.170 In the article, one Idahoan is quoted as stating, "Idaho is not going to stand down and let their minorities be treated like second class citizens."	populations within the context of Government-to-Government Tribal consultation. Through these consultation processes, the BLM has, and would continue to, provide consulting parties with opportunities to review and consult on the project's PA and associated management plans and reports. The BLM's EIS analyses under NEPA and preparation of the PA pursuant to NHPA Section 106 included incorporation of community knowledge and concerns—including on TCPs—identified through project scoping, Section 106 consultation with Native American Tribes and other consulting parties, per 36 CFR 800, the BLM's Government-to-Government consultation with Native American Tribes, and DOI Office of Collaborative Action and Dispute Resolution outreach efforts to the Japanese American community in Idaho and throughout the United States. The BLM has accorded these consultation efforts with all due diligence and good faith. As stated in Section 3.6.1.4 (Compensatory Mitigation) of the environmental justice analysis, the BLM will continue to solicit input from environmental justice populations regarding potential mitigation measures for adverse effects to facilitate collaborative decision-making throughout this EIS process.
11535-51	Steven Andersen	On its face, the DEIS fails to adequately preserve and protect the Tribal treaty rights, historic resources and emotional impacts to Japanese Americans and Alaska Natives. It fails to analyze adverse effects on populations subject to environmental harm that have been historically subject to exploitation and disadvantaged, including the poor and minorities. An inadequate analysis was conducted of the history of the land and the communities impacted by this project.	See response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
11535-52	Steven Andersen	The DEIS failed to thoughtfully and effectively analyze the precise location of low-income and minority populations in relation to the specific turbines and how site operation would impact these populations. Again, the location for the turbines must precede any reliable analysis to the majority of impacts addressed in the DEIS. Without finite details on the location of the turbines and the location of roads, it is impossible to analyze the proximity to minority and low-income populations and tribal and cultural resources, and the related impacts – everything from electromagnetic exposure, microwave interference, impacts to farming operations (livelihoods), to visual impacts to shadow flicker to noise.	As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), the project's final design and engineering would be completed after the BLM has issued a ROD and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. This approach provides flexibility for the project design to be adjusted in response to resource constraints through site-specific engineering for the final layout. The BLM's environmental justice analysis (EIS Section 3.6.1) is in full compliance with EO 12898 and IM 2022-059. Discrete turbine locations are not necessary for project related effects on environmental justice populations to be estimated within a reasonable range of certainty. The EIS analysis of potential effects to environmental justice populations conservatively assumed that the entire area within the siting corridors would represent a potential source of visual, noise, dust and traffic impacts for surrounding communities.
11535-55	Steven Andersen	The DEIS states that "the likelihood or degree to which property values may or may not be affected cannot be predicted with any certainty." However, it ultimately concludes that "property values in the analysis area would not likely be affected by the project." This conclusion cannot be supported by the data as the DEIS itself cites numerous experts who assert that property values are significantly impacted by the construction of wind turbines.175 To support its conclusions, the DEIS cites a number of sources with inherent biases in making studies and drawing conclusions. For example, the DEIS cites a 2009 study by Hoen et al., and a 2013 study also by Hoen, with slightly different supporting authors. Both studies were prepared for and funded by the Office of Energy Efficiency and renewable Energy Wind & Hydropower Technologies Program of the U.S. Department of Energy. The funding source draws into question the credibility of the ultimate conclusions of these sources. Moreover, experts have critiqued the Hoen et al. because the hedonic analysis it uses and its subsequent interpretation "tends to place heavy emphasis on the majority at the expense of the minority."176 Under such an analysis, "[p]articular neighbourhoods [sic] or social groups placed near turbines for example, that do indeed experience property value loss, may be drowned out in this aggregate analysis."177 Second, Hoen et al.'s study "tends to be based on distance zones, but rarely within less than half mile (805 m), [which] may not provide adequate spatial resolution."178 Finally, Hoen et al. and Lang et al. (2014) both fail to account for "homes that are not put on the market due for fear of net financial loss." Likewise, the DEIS fails to account for diminution of property loss due to individual preferences surrounding wind farm proximity to property. The studies cited in the DEIS do not account for homeowners' preferences, which is "particularly important as they ultimately decide final asking and selling prices."180 "Research from Australia found that 38% of respondents would pay 1–9% less for a property due to the presence of a local wind farm. In Ontario, work from Baxter et al. found that the majority of residents in both a control (69%) and a 'wind turbine' community (55%) reported concerns that turbines may lower property values." Additionally, Hinman (2010)182 provides evidence of a "location effect" which means that before a wind project is even approved, properties located near the eventual wind farm area were devalued in comparison to other like properties. This is a result from homeowners being concerned about "ancillary impacts including visual and acoustical disturbances, and…turbine-related health effect." 183 Hinman's results also suggest the existence of "wind farm anticipation stigma theory" where property values are diminished in anticipation of the development of a new wind farm.184 In their research, Walker et al. (2014) found that turbine-related real estate loss is perceived to already have occurred for some residents in both communities before the project was even completed.185 This overall perception is relevant because it affects asking and selling prices and overall mitigation of negative impacts. "If men define a situation as real, it is real in its consequences."186 The DEIS concludes that values cannot be predicted with any accuracy but has not attempted to examine property values before and after this project was announced. It shrugs off this issue by asserting that any possibility of change in property value is "either too small and/or too infrequent to result in any widespread and consistent statistically observable impact." This project will require an exorbitant amount of land, which means a greater number of property owners will be affected. "Wind power is naturally intermittent, and plants typically operate at about 25% of full capacity, compared to coal and natural gas plants operating at 90%."191 While	The BLM has reviewed the data sources provided. EIS Section 3.6.4 (Residential Property Values) has been revised to discuss additional factors affecting property values and to cite additional articles that provide further support for the range of conclusions which were already discussed in the analysis. The analysis conclusion has been revised to clarify that there is a potential for property values in the analysis area to be affected by the project. U.S. census data related to property values and asking prices are not available at the scale that would be needed to perform a more detailed and site-specific analysis of property value changes in relation to the project.

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		larger wind turbines generate more energy, they also take up more land due to spacing requirements. “Land area requirements vary with turbine spacing and configuration, but are typically larger than required for almost all other forms of energy production, including solar facilities of similar power output.”192 Research from Harvard suggests that “that not only will wind farms require more land area to hit the proposed renewable energy targets but also, at such large scale, would become an active player in the climate system.” 193 In making this point, Clemente cites experts supporting the position that wind farms do, in fact, affect property values. Dr. James A. Chalmers, qualified as an expert witness in over 20 states, found that residential properties near transmission lines sold for 20-50% less than comparable residential properties.194 Michael McCann, of McCann Appraisal, LLC based in Chicago, concludes that: Residential property values are adversely and measurably impacted by close proximity of industrial-scale wind energy turbine projects to the residential properties up to 2 miles and a range of 25% to approximately 40% of value loss.195 John Leonard Goodwin, who has been a real estate broker for more than 10 years in Ontario, Canada, reports that wind turbines absolutely do impact property values: “Turbines complicate your property enjoyment, period. That alone spells depreciated value...they will also cause a significant loss of real estate value.”196 According to research in 2014 by the London School of Economics, wind farms can cut as much as 12% off the value of homes within a 2 kilometer radius, reducing property values as far as 14 kilometers away.197 In 2013, an Ontario Superior Court of Justice determined that landowners living near large wind farms do suffer from lower property values, with the court accepting a 22-55% reduction in overall value.	
11535-56	Steven Andersen	Furthermore, the DEIS focuses mostly on home values but does not adequately address how this project impacts the value of farms and crops. Takle (2018) discusses the negative effect that wind turbines may have on crops due to increased heat in the area.187 Mensching (2017) describes issues on farmers such as damaging fields during construction of wind turbines and drainage problems which may prevent farmers from planting in the first place.188 She also points out that wind turbines sometimes foreclose the use of crop dusters used by farmers to spray pesticides to protect their crops. The DEIS does not consider these concerns, which are specific to the properties being impacted by the proposed project. The value of the land is tied to the ability of farmers to make a livelihood, preserve the peace they obtain by living in a rural community. If they have drainage problems with fields, or their livestock have grazing issues, or their dairy cows’ milk production drops, or they can’t spray their fields, their land is of little value, and their livelihoods are in jeopardy.	The EIS analyzes potential effects on residential property values in EIS Section 3.6.4 (Residential Property Values). Although this analysis is focused on describing the potential effects of wind turbines on residential property values, some of the case studies cited in this analysis looked at rural residential properties within agricultural tracts and zoning designations. Therefore, the analysis in Section 3.6.4 applies to all types of residential properties, ranging from urban to rural/agricultural. Potential effects to farming-related land uses are further evaluated in Section 3.9.1 (Grazing Allotments and Range Socioeconomics), Section 3.8 (Land Use), and AIB-15 and AIB-16 (EIS Appendix 3). EIS Section 3.8 (Land Use and Realty) has been revised to discuss farming-related communication uses in the analysis area (see Section 3.8.1.1.4) and to analyze how they might be affected by the project (see Section 3.8.1.2).
11535-62	Steven Andersen	The DEIS also fails to account for the economic cost that a wildfire could have on the region. According to 2015 reports, “a fire incident at a turbine can cost up to $4.5 million.”209 When accounting for the fact that turbines have grown substantially in size and upfront cost, as well as accounting for inflation, this figure is likely to have increased dramatically. Additionally, this figure does not account for the economic damage that a wildfire could have on the surrounding community in the form of property values, insurance policies, and livestock.	EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression) analyzes how the project would affect the risk of human-caused or natural-caused wildfire ignition and spread in the analysis area and wildfire response and suppression efforts. Under all action alternatives, there would be an increased risk of wildfire ignition and increased access for ground response coinciding with inhibited aerial response suppression activities. The degree of impacts under each of the action alternatives would generally be reduced as the project footprint goes down in size. Quantitative estimates of increased fire frequencies, intensities, or sizes are not provided in Section 3.7.1 and cannot be predicted for the life of the project with any certainty. Therefore, monetizing the economic impacts on local communities associated with increased wildfire risks would be too speculative. A brief qualitative discussion of potential effects on local fire districts has been added to Section 3.6.2 (Community Services, Employment, and Housing Availability) to connect the effects from Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression) with the socioeconomic analysis. In addition, Section 3.7.1 has been revised to include additional discussion of project impacts to aerial wildfire suppression efficiency, including how wind turbine heights would impact water and retardant drop heights.
11535-64	Steven Andersen	With reference to environmental justice, the devastation of a wildfire can have wide ranging consequences, and research shows that low-income communities suffer disproportionately from such disasters.211 The impact of the proposed action on wildfires is a significant issue and it should have been analyzed in conjunction with impacts that are inextricably intertwined, including, but not limited to, environmental justice, socioeconomics, cultural sites, land and realty, endangered species and the environment.	See response to comment 11535-62 (see in Table A-3h, Environmental Justice and Socioeconomics).
11535-94	Steven Andersen	Additionally, the project would halt critical wildfire suppression in an area known for rapidly spreading wildfires (due to wind). Since 1980, 1,278 wildfires have occurred within a 20-mile radius of the project area. These wildfires have devastating impacts on operating farms, wildlife and low-income, rural communities. The BLM’s own Idaho aviation plan for fighting wildfires advises of the hazard of towers over 200 feet, which pales in comparison to the hazard of 500 towers over 600 feet high. Reducing navigable airspace to battle wildfires in an area known for large wildfires will not just reduce suppression activity, but threaten the wellbeing of nearby individuals, animals and wildlife. The DEIS simply states that FAA regulations do not limit the proximity of aircrafts to tall structures for fire suppression and engagement is at the pilot’s discretion. A pilot should not have to endanger himself to suppress a fire by flying, in smoky conditions, between large turbines.	See response to comment 11535-62 (see in Table A-3h, Environmental Justice and Socioeconomics).
11546-3	Dan Sakura	Health Impact Analysis. Because of the disproportionately high and adverse impacts on the Japanese American community and the connections between emotional and physical health, the BLM should conduct a Health Impact Assessment (HIA) on the health impacts on the Japanese American community, Alaska Natives and all members of the public. An HIA is a systematic process that uses an array of data sources and analytic methods and considers input from stakeholders to determine the potential effects of a proposed policy, plan, program, or project on the health of a population and the distribution of those effects within the population. Health impact assessment provides recommendations on monitoring and managing those effects.7 HIAs are tools to consider the health impacts of federal action in native villages in Alaska in association with proposed oil and gas	Potential physical effects to human health and safety are analyzed in the EIS in AIB-10 through AIB-14 (EIS Appendix 3), and potential psychological effects on the Minidoka community are discussed in Section 3.6.1 (Environmental Justice Communities). In addition, the EIS analyzes the potential project-related effects on several environmental factors that influence public health and safety including air quality (Section 3.2), groundwater quality (Section 3.17.3), noise (AIB-20 in EIS Appendix 3), and hazardous waste (AIB-45 through AIB-47 in EIS Appendix 3). The commenter has not identified any deficiencies in the existing EIS analysis that warrant or justify the completion of an HIA.

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		development and in California in the San Francisco/Oakland area. Please consider this compilation of case studies related to local, state and federal projects in your analysis related to health impacts.	
11551-6	Erin Shigaki	In addition, I support the petition from the Friends of Minidoka to designate the Greater Minidoka Area of Critical of Environmental Concern.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11554-5	Raul Labrador; Idaho Attorney General's Office	Most importantly, Idaho has a critical sovereign interest in protecting "the health and well-being—both physical and economic—of its residents." Alfred L. Snapp & Son, Inc. v. Puerto Rico, 458 U.S. 592, 607 (1982). The Project harms the physical and economic well-being of Idahoans in several ways. First, an influx of temporary labor and federal dollars to construct the Project could cause a temporary housing shortage and lead to long-term increases in housing costs that price out Magic Valley residents. The rapid influx of short-term labor will strain local infrastructure and services like public schools and law enforcement. See draft EIS at ES-xix. Second, the Project will rapidly increase the number of roads and traffic in the Magic Valley Region. The Project will require the construction of more than 500 new roads. This influx in traffic will raise the risk of traffic-related injuries and fatalities and place more strain on existing roads and bridges. Third, a short-term influx of federal dollars threatens to create a boom-bust economic cycle in the Magic Valley region. The draft EIS projects that the Project will bring in $277 million during its two years of construction, but only $15 million per year during the Project's operation. draft EIS at ES-xix.	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).
11598-2	Idaho Conservation League	The No Action Alternative would not permit the project but this is not a satisfactory outcome from our perspective. The No Action Alternative would not meaningfully respond to public concerns about the overall suitability of this location for industrial development. The No Action Alternative simply leaves the door open for another project that could also have alternatives incompatible with the current set of values. We believe that the BLM should instead take action to permanently protect the Pronghorn Migration Route, remaining areas with conservation value for sage-grouse, the viewshed around the Minidoka National Historic Site and original relocation center area, and Wilson Butte Cave and other cultural areas.	The commenter is suggesting a land use designation process that is outside the scope of this NEPA analysis; please also see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding the BLM evaluating the proposed Greater Minidoka ACEC designation through a separate process outside of the project.
11598-6	Idaho Conservation League	Regardless of how the BLM proceeds with the Lava Ridge Project, we strongly recommend that the BLM continue the work started in its Renewable Energy Strategy and take the next step to initiate an RMP amendment process across southern Idaho, similar to the work the BLM and the State of Idaho conducted regarding sage-grouse. It may make the most sense to delay pursuing a development alternative for Lava Ridge until after this resource management plan amendment process is completed. Many of the unresolved questions regarding Lava Ridge could be addressed through this process. This process should be collaborative in nature and could be developed in partnership with Tribes, BLM, the BLM RAC, various public lands stakeholders, potentially affected Counties, and relevant State of Idaho agencies including the Idaho Office of Energy and Mineral Resources, the Idaho Dep't of Lands, the Idaho Dep't of Fish and Game, the Idaho Office of Species Conservation, and the Idaho Dep't of Water Resources.	The commenter is suggesting an RMP amendment, which is outside the scope of this NEPA analysis. In accordance with CEQ's NEPA regulations at 40 CFR 1502.16(a) and 40 CFR 1506.2(d), the BLM must only consider possible conflicts between the Proposed Action and approved land use plans and policies, including to BLM's RMP objectives. As stated in EIS Appendix 2, public lands in the analysis area are managed in accordance with BLM SFO's 1986 monument RMP (BLM 1986), as amended, and the 2015 greater sage-grouse ARMPA (BLM 2015). The Proposed Action and alternatives described in this EIS are in conformance with both of these plans.
11598-25	Idaho Conservation League	ACEC protections Under the 1985 Monument Management Framework Plan, large-scale energy development is allowed throughout the project area. Some sideboards, stipulations or special conditions are mentioned but they have not been applied in such a way that protects culturally sensitive resources: Moderate use areas are generally suitable for a wide range of existing and potential uses and will be managed for production and use of their forage, timber, minerals and energy, recreation, or other values. Where conflicts occur with resources or uses, full consideration of all benefits and costs will be taken into account in resolving such conflicts. Sensitive and significant values will always be protected consistent with Federal and State law. Public lands in a moderate use area will be retained in Federal ownership. (BLM 1986:4) No special limitations or restrictions on the type or intensity of resource use will be applied in this area. Valid uses will be allowed subject to environmental review and stipulations or special conditions to protect resources. (BLM 1986:6). EIS 1-2. For portions of the project area that the BLM concludes are not appropriate for turbine corridors, we recommend that the BLM amend the Management Framework Plan to designate these no-build areas as permanent no-build special areas and reclassify them from Moderate Use to a more protective designation such as an Area of Critical Environmental Concern that precludes similar types of development so that sensitive and significant values will truly be protected. Resource Management Plan amendments As mentioned in our June 22 letter to the BLM State Director following the Lava Ridge Tour, we propose that the Idaho BLM undertake a series of Resource Management Plan amendments, similar to the Greater sage-grouse RMPA (Resource Management Plan Amendments) process. The Monument RMP is one of the oldest RMPs in the country and many of the other RMPs are also significantly outdated and insufficient to provide adequate guidance on renewable energy development. Without a consistent approach to this issue, we are concerned that public lands are going to be developed in an uncoordinated and patchwork manner with projects receiving different levels of scrutiny, varying levels of protections, inconsistent design features, insufficient mitigation measures and suboptimal coordination for efficient energy development. Just as the Greater sage-grouse RMPA focused on management issues that may affect Greater sage-grouse, this Renewable Energy RMPA would update RMPs to examine resource energy potential and energy transmission and the effects that these projects might have on cultural resources, wildlife habitat, recreation and other community values. For areas that are identified through this RMPA process as being incompatible with renewable energy development, the RMPs should be amended to preclude such development and safeguard these resources. For areas that are deemed not suitable for renewable energy development, this determination should be codified in the RMP amendments. Temporary segregation or withdrawal for renewable energy projects, similar to an administrative mineral withdrawal, could be another option. Even if the BLM selects the No Action Alternative for the Lava Ridge project because of cultural or wildlife	See response to comment 11598-6 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		values or other issues, there is currently nothing in the current RMP that would prevent another project from being proposed in the very same area. If there is always the possibility of such a proposal being developed in an area with conflicting and unresolvable issues, it will be difficult for the BLM and partners to optimize the other values in this area such as restoring habitat for wildlife or additional interpretation of cultural values. If wildlife habitat is determined to be of critical importance, as has been expressed for certain areas of Lava Ridge, then the RMP should be amended to state that these areas are to be managed instead for wildlife habitat conservation and restoration. Likewise, areas with fewer resource conflicts could be optimized for renewable energy development but the RMPA would allow for more strategic and expanded mitigation opportunities.	
11598-37	Idaho Conservation League	We recommend that the BLM use the opportunity afforded by this NEPA process to designate areas around the Minidoka National Historic Site and Wilson Butte Cave as unavailable for future energy development and prioritize areas such as the Pronghorn Owinza migratory corridor for habitat restoration.	See response to comment 11598-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
11604-2	Name Not Provided	[...] the BLM should designate the entire viewshed from Minidoka as an Area of Critical Environmental Concern and Traditional Cultural Place.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11615-9	Spencer Dixon	The bat populations killed will likely lead to extinction of bats in the area and an increase in mosquitoes and other harmful insects. This in turn will affect farmers crop production	Potential effects to bat populations are analyzed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat) and AIB-6 through AIB-8 (EIS Appendix 3). These EIS analyses do not predict any extinctions for bat populations.
11617-3	Stephen Kitajo	I request that the BLM move forward with seeking public comment regarding the currently proposed Greater Minidoka Area of Critical Environmental Concern and to work with the NPS, the Idaho State Historic Preservation Office, and other partners regarding the Minidoka Traditional Cultural Property National Register eligibility determination for more permanent protections for Minidoka.	See responses to comments 12859-2 and 11672-3 (see in Table A-3h, Environmental Justice and Socioeconomics).
11618-4	Bif Brigman	Having y'all deciding what is and isn't Environmental justice is a total farce. Y'all need to do better. Much better. Why won't BLM address the numerous presidential proclamations and executive orders that specifically address issues of environmental justice and not impacting historically, marginalized, ethnic communities? Why?	See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).
11620-10	Simone Griffin; BlueRibbon Coalition	Local communities rely on motorized recreation for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in this area. Local groups have worked hard to put the area on the map so that they could reap the economic benefits. Closing roads or creating re-routes which are proposed, could hinder economic opportunity and needs to be thoroughly analyzed. According to the Bureau of Economic Analysis, outdoor recreation had a record breaking year in 2021. Outdoor recreation now accounts for $821 billion in economic activity. For reference, the oil and gas industry is $812 billion. Outdoor recreation is popular. It is an economic juggernaut. Yet, public land agencies act as if this nearly $1 trillion dollar industry is optional or an afterthought. Instead of building new roads, trails, campgrounds, and infrastructure to accommodate the new growth in outdoor recreation, land managers are relentlessly closing public lands for the public to use. A deeper dive into the numbers reveals that the engine driving this record-breaking growth is literally the millions of engines that find their way into the various forms of motorized recreation. Non-motorized forms of recreation account for $33 billion in economic value. Gear that is used in all forms of recreation accounts for $52 billion. Motorized forms of recreation account for a shocking $78 billion in economic value. BRC would like to point out that the largest current wind farm in Idaho is more than ¼ the size of the proposed project. The BLM did not fully analyze the effects of a project of this magnitude and how it will affect recreation opportunities.	The BLM analyzed potential effects of the project on various types of recreational uses, as follows: potential effects to hunting, trapping, and OHV uses are analyzed in Section 3.12 (Recreation) and potential effects to dispersed recreational opportunities, public motorized access, SRMAs, cave resources, and hunting spending are analyzed in brief in EIS Appendix 3 (see AIB-25 through AIB-29). Based on the results of these analyses, the magnitude of effects on recreational uses is not expected to cause meaningful changes to recreational spending in the regional analysis area.
11622-9	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	We have significant concerns about the BLM's proposed Lava Ridge wind project that would dishonor sacred ground for Minidoka survivors, descendants and the larger Japanese American community, including survivors and descendants with both Japanese and Alaska Native heritage. We support renewable energy and the Biden Administration's policy to combat climate change which is predicated on environmental justice principles. Because of BLM's findings that preferred Alternatives C and E would have "disproportionately high and adverse impacts" on the Japanese American and Indian Tribes, the proposed Lava Ridge project does not comport with the Administration's policy goals to fight climate change and advance environmental justice. Instead, the Lava Ridge project unnecessarily pits these two goals against each other.	See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).
11652-3	Natasha Varner	As we address the climate crisis, we cannot dismiss Minidoka's historical significance nor replicate the injustice wherein communities of color experience a disproportionate burden from our fossil fuel economy. Our sustainable, clean energy future must be intersectional in its approach and center those communities most impacted. The selection of a site in direct proximity to Minidoka is antithetical to the Bureau of Land Management's Environmental Justice Implementation Instruction Memorandum (https://www.blm.gov/policy/im2022-059). By listening to the community's opposition to the proposed site of Lava Ridge and deciding to not move forward with the Lava Ridge project as proposed, you have the opportunity to set a new standard for how we ethically approach clean energy production going forward.	See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).
11661-2	Sam Kito Jr	we encourage BLM to begin a public planning process in support of the Greater Minidoka Area of Critical Environmental Concern (ACEC). We also agree that the lands surrounding Minidoka are Traditional Cultural Property for both Japanese Americans and Alaska Natives with ongoing cultural connections to Minidoka.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11661-3	Sam Kito Jr	Based on the importance to Minidoka, we respectfully request your consideration of the following comments: Impacts Analysis: The DEIS fails to analyze the impacts of the project on Japanese Alaskans, including Tlingit, Haida, Tsimshian, Aleut, Inupiat and others, who were wrongfully incarcerated. Because of the unique	See response to comment 11315-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		circumstances of the Japanese Alaskans, many families were separated from their fathers, like our family, further compounding the harmful impact of the incarceration on Japanese Alaskans.	
11661-4	Sam Kito Jr	As noted by a multi-agency Memorandum of Understanding (MOU) signed by the Department of the Interior: … the relocation of many Indian Tribes, the Native Hawaiian Community, and Indigenous peoples from their original homelands has had traumatic impacts on those people collectively at the time, and has enduring negative impacts on the social, cultural, spiritual, mental, and physical wellbeing of Indian Tribes, the Native Hawaiian Community, and Indigenous peoples today.2 The Sacred Sites MOU states the that "Federal agencies, including those that approve or fund projects, are responsible for assessing and considering the potential impacts of their decisions on sacred sites and historic properties of traditional cultural and religious importance."3 We encourage BLM to accurately describe the baseline of the Japanese Alaskan community and the adverse impacts of the wind project on Japanese Alaskans and include relevant analysis of the project on Alaska Native survivors and descendants and include them as a separate category of "Dispersed Environmental Justice Community," throughout the FEIS.	See response to comment 11315-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11661-6	Sam Kito Jr	Federal Trust Responsibility. Please describe the Department of the Interior's trust responsibility to protect Alaska Native Tribal interests with regard to the Japanese Alaskan community, which is a dispersed environmental justice community. Please explain how BLM Alternatives C & E's disproportionately high and adverse impacts on Alaska Native sacred ground is consistent with this trust responsibility.	The DOI's trust responsibilities are described in EIS Section 3.5.1 (Native American Resources). This section identifies the specific Treaties that relate to federally recognized Tribes with ancestral ties to the project area. In accordance with NEPA, the EIS fully considers impacts to natural and cultural resources from proposed long-term occupation of lands by the project, including such plant, animal, water, and mineral resources that may be associated with tribal rights or interests. Section 3.6.1 (Environmental Justice Communities) of the EIS has been revised to include additional discussion of Tribal Treaty rights and trust resources. Alaska Native Tribes are not specifically identified in any of the relevant Treaties listed in Section 3.5.1. However, Alaska Natives are part of the "Japanese American and Minidoka-Connected communities", and therefore, their interests and concerns associated with the Minidoka NHS and greater WRC area are considered and analyzed in EIS Section 3.6.1 (Environmental Justice), as well as EIS Section 3.5.1 (Native American Resources).
11661-7	Sam Kito Jr	Area of Critical Environmental Concern: In announcing the Sacred Sites MOU, we appreciate Sec. Haaland's leadership to preserve sacred sites important to indigenous people and her support for actions to protect Indigenous Sacred Sites: "Since time immemorial, the Earth's lands and waters have been central to the social, cultural, spiritual, mental, and physical wellbeing of Indigenous peoples. It is essential that we do everything we can to honor sites that hold historical, spiritual or ceremonial significance …. The Interior Department is committed to protecting these sacred sites from desecration, while at the same time collaborating with Indigenous communities to increase access and ensure good stewardship of their lands."6 The MOU includes guidance to federal agencies to avoid actions that could damage sacred sites and to take pro-active measures to ensure good stewardship: "agencies should take a forward-thinking approach and not only seek to avoid adverse actions, but collaborate with Indian Tribes and Native Hawaiian organizations to ensure good stewardship of their lands and allow their rightful access and use to certain public lands …"7 The further MOU states that sacred sites include broader landscapes with cultural significance to indigenous people: "Participating Agencies acknowledge that sites sacred to Indian tribes and the Native Hawaiian Community often occur within a larger landform or are connected through physical features or ceremonies to other sites or a larger sacred landscape."8 The proposed Greater Minidoka ACEC is a sacred landscape for Alaska Natives along with the Japanese American community. We encourage the BLM to begin a public planning process to designate the Greater Minidoka ACEC, as required by the Sacred Sites MOU, the Federal Land and Policy Management Act, National Park Service Organic Act, Minidoka National Historic Site authorizing legislation and other relevant authorities.	See responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11672-3 (see in Table A-3h, Environmental Justice and Socioeconomics).
11672-3	Teiko Saito	The Friends of Minidoka have submitted to BLM a proposal that the agency establish a 237,000 acre Greater Minidoka Area of Environmental Concern (ACEC) to preserve the cultural and historic values of the land surrounding Minidoka. The Friends have made a compelling argument as to why its proposal satisfies both the statutory and regulatory criteria for an ACEC. Given the fact that the horribly outdated Monument RMP fails to protect the historic footprint of the Minidoka War Relocation Center, as well as the surrounding viewshed of Minidoka, I strongly urge BLM to amend the Monument RMP and adopt the proposed Minidoka ACEC. I also urge BLM to develop an expedited process for satisfying the NEPA requirements for such an ACEC Monument RMP amendment.	The BLM is evaluating the proposed ACEC designation and TCP boundary for the Greater Minidoka area through a separate process that falls outside the scope of this NEPA analysis. In accordance with CEQ's NEPA regulations at 40 CFR 1502.16(a) and 40 CFR 1506.2(d), the BLM must only consider possible conflicts between the Proposed Action and approved land use plans and policies, including the BLM's RMP objectives. As stated in EIS Appendix 2, public lands in the analysis area are managed in accordance with BLM SFO's 1986 monument RMP (BLM 1986), as amended, and the 2015 greater sage-grouse ARMPA (BLM 2015). The Proposed Action and alternatives described in this EIS are in conformance with both of these plans.
11672-5	Teiko Saito	Let me just close by noting that I am no stranger to tough decision-making by Interior Department federal agencies, having spent 33 years ofmy career at Interior, including 31 of those years with the U.S. Fish and Wildlife Service where I became the first Asian American to reach Senior Executive Service status. Although most of my career with FWS involved international wildlife conservation, I did spend considerable time working in the Endangered Species Act program. I mention this because it is my understanding that the original proposed location of the Lava Ridge Project was shifted to its current site, in order to avoid destroying important sage grouse habitat. For the record, let me emphatically state that I am not only an ardent supporter of expanding renewable energy sources for this country, I am also an equally ardent supporter of the Endangered Species Act and sage grouse conservation. It is not lost on me that during the Obama Administration, BLM adopted and actively promoted its "Smart from the Start" renewable energy policy that was designed to steer renewable energy projects away from high conflict sites on public lands and to redirect them to low conflict sites, thereby facilitating their construction. Steering Lava Ridge away from sensitive sage grouse habitat was a classic example of "Smart From the Start." By contrast, however, redirecting that project to an alternative site that invades the historic footprint of Minidoka and destroys the viewshed of the National Historic Site is the very antithesis of a "Smart from the Start" decision-making process. Moreover, ifBLM approves the project in its	In accordance with CEQ's NEPA regulations, the BLM analyzed the potential effects of the Proposed Action and alternatives on several different resource topics identified through internal and external scoping including but not limited to natural resources, cultural and historic sources, and environmental justice. The BLM will make a reasoned choice among the alternatives based on the EIS analysis for all resources, and the BLM cannot determine significance for a proposed action based on environmental justice effects alone. Also see response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		current proposed location, the Biden Administration will be sending the message that it values sage grouse conservation more than it does protecting a unit of the National Park System that tells the story of one of the most shameful and racially discriminatory episodes in American history. If the mantra of "environmental justice" means anything to the Biden Administration and Secretary Haaland, it must mean rejecting Lava Ridge as it has been proposed, thereby telling the Japanese American community that our history of discrimination matters just as much as the conservation of sage grouse and other cultural/historical sites in the Park System. In 1942, the federal government encircled our camp with barbed wire. In 2023, BLM is being asked to encircle our sacred site with wind turbine towers and blades. Instead of being able to connect with the same lonely landscape that my mother had seen at the end of her life, I would now be distracted by massive twirling blades on an endless sea of turbines. There is no shortage of Presidential Executive Orders like Executive Order 13985 or Secretarial Orders like Secretarial Order 3399 for BLM to follow which promote racial and environmental justice. The only question that remains is whether with regards to Lava Ridge, the agency's final decision will embrace those Orders' spirit and intent? On behalf of not only myself but my brother's family as well, I urge you to protect the hallowed ground and viewshed of Minidoka for generations of Japanese Americans to come.	
11672-6	Teiko Saito	• The Minidoka Relocation Center and its viewshed have also been identified in a study and report commissioned by the Friends of Minidoka as qualifying as a Traditional Cultural Property (TCP) eligible for inclusion in the National Register of Historic Places. This TCP proposal has been endorsed by the Idaho State Historical Society and the State of Idaho Historic Preservation Officer has concurred in its eligibility for inclusion on the National Register. I urge you to consider the information in the TCP report as part of the Greater Minidoka ACEC nomination process and to give great weight to Minidoka's and its viewshed's National Register eligibility during your decision-making on the Lava Ridge Project.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11724-2	Diana Nielson	I, the undersigned. object to too development of BLM and IDOL Public Lands for the use as a Large Scale Wind Turbine Project. There am many reasons. Some are listed below. 1. Rural gentrification & displacement by a wealthy out of state investor LS Power, to benefit another state [...] 4. Economic impacts to adjoining property owners. Generations of ranches will loose grazing and no documented mitigation plan for their losses has been offered. [...] 6. Excessive use of water during construction. Drilling 6 wells & they will need to find more water to buy. 7. Loss of Public Access 8. Loss of hunting units [...] 10. Large scale battery storage is hazardous. [...] 12. Noise pollution 13. Light pollution 14.Law Enforcement& Emergency Service communication disruption 15.heavy loads on rural county and state Highways will cause breakups. 16. loss of Civil Liberties the local population landowners 17. TRRAFIC: Wide & long loads holding up traffic 18. After construction only up to 20 jobs for 25 years the poor reclamation plan.	See response to comment 11204-38 (see in Table A-3h, Environmental Justice and Socioeconomics).
11772-1	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	We support Alternative A – the No Action Alternative – and respectfully request that the BLM seek public comment regarding the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC) and work with the NPS and State of Idaho SHPO regarding the Minidoka Traditional Cultural Property (TCP) National Register eligibility determination.	See responses to comments 12859-2 and 11672-3 (see in Table A-3h, Environmental Justice and Socioeconomics).
11772-6	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	In addition to flaws in the DEIS, we wish to express our concerns about BLM's failure to follow DOI, BLM and Biden Administration policies regarding engaging with Environmental Justice Communities early in the planning process. While we appreciate BLM's outreach through Langdon Group/CADR program and the public meetings in Washington and Oregon, we felt that it was more of a "check the box" approach rather than a good-faith effort to engage with the Japanese American and Alaska Native community as required by Administration policies. This can be seen by BLM's disregard for some of the most important findings in the Lava Ridge Wind Project Stakeholder Assessment and Engagement Report that was produced by Langdon Group/Kearns & West for BLM in preparation for the DEIS process, such as the section that stated "appropriate meeting locations, dates and times should be coordinated with Local Japanese American community groups." In the Seattle area, a single public open house was held on Mercer Island to discuss the DEIS with the community. The location, date, and time were not discussed with local Japanese American community groups.	See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).
11775-2	Stephen Kitajo	The BLM's preferred alternatives C and E are found to have "disproportionately high and adverse impacts" to the Japanese American community in the DEIS. Knowing these impacts, the BLM has still opted to mark these alternatives as preferred. Based on this, I question the BLM's priorities and their understanding of what Minidoka means to the Japanese American community. The Lava Ridge Wind Project Stakeholder Assessment and Engagement Report was produced by Langdon Group/Keans & West for BLM in August of 2022, before the release of the DEIS. This report found that the BLM should try to engage with stakeholders for future meetings, saying that "appropriate meeting locations, dates and times should be coordinated with Local Japanese American community groups." When the BLM announced that a single public open house to discuss the DEIS would be held in the Seattle area in March 2023, the Japanese American community was surprised because no community groups were contacted to coordinate the open house. That report also found that increased "cultural competency training within BLM is warranted for meaningful engagement." When I attended the open house, I attempted to discuss with the BLM representatives how the Japanese American community in Seattle had a long history of being forced to live in certain areas of the city through redlining and racially restrictive housing covenants, and how Minidoka could be seen as a continuation of that injustice when looking at the community's history. Instead of a discussion, I found myself having to educate the representatives on this history. Based on the lack of cultural competency training and ability to meaningfully engage with the Japanese American community that I experienced at the open house, I do not believe the DEIS adequately incorporates the true	See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		significance of Minidoka to the Japanese American community. It would be irresponsible of the BLM to move forward with any action until this is adequately understood.	
11775-4	Stephen Kitajo	This is why I request that the BLM move forward with seeking public comment regarding the currently proposed Greater Minidoka Area of Critical Environmental Concern and to work with the NPS, the Idaho State Historic Preservation Office, and other partners regarding the Minidoka Traditional Cultural Property National Register eligibility determination for more permanent protections for Minidoka.	See responses to comments 12859-2 and 11672-3 (see in Table A-3h, Environmental Justice and Socioeconomics).
11781-1	Gretchen Clelland	I am writing today to voice my opposition to the Lava Ridge Wind Energy project. The main reason for my objection is the financial numbers don't add up. According to Magic Valley Energy's website the construction of these windmills is going to employ 700 people and employ 20 people full time after completion. Do these workers have families, more specifically school age children. If Eighty percent of these workers have children that need to go to School that would be 560 families and if they have under the national average of 2.5 kids per family and only have 2 kids in need of public education that would be over 1000 kids added to these tiny districts. A few of these kids may go to Jerome or Minidoka schools but this is a huge problem because of the temporary need to educate these kids. The number of students in Lincoln County could be doubled. The schools would not want to build new facilities to house this influx because after a couple years these workers will have moved on and these districts would be left with buildings to maintain or temporary structures to dispose of when the work force is reduced to 20 from 700. The need to educate children is just one example of the short sidedness of this project. What other infrastructure improvements will need to be made to accommodate this temporary work force. Schools and infrastructure are just one of the reasons the BLM should not proceed with the Lava Ridge wind farm. There is a whole list of other reasons starting with the birds that will be killed or the total unsightly landscape that will be created I could go on for pages and pages but I will stop here and simply ask the Bureau of Land Management NOT to proceed with the Lava Ridge Wind Farm project.	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
11787-4	Representative Jack Nelsen	LS Power has also left unaddressed the effects of 700 workers descending on the small towns and communities surrounding the project. One of the big questions is where will all these people live, when housing is short for our local citizens right now? Rent prices are sure to soar, leaving many in our community possibly unable to afford to live here any more. Who will provide the services needed to meet the needs of these temporary workers? New businesses will sprout up for sure, but what happens to them when the 700 workers leave town when construction is complete. My fear is this project will leave behind broken communities, 20 permanent workers, and a desert environment completely and unalterably changed forever.	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).
11788-3	Representative Jack Nelsen	3. The last of my major concerns is the lack of thought given to 700 workers dropping into the small towns surrounding the project. LS Power has determined there will be no problem finding 700 workers – my concern is where will these people find housing when it's next to impossible to find housing now, without adding 700 more folks to the rental pool. Not to mention the effect on the cost of rent, the availability of local services to meet the demands of this sudden large influx to our population, and finally……after the construction is complete and the 700 people leave town, what happens to all the businesses which were created to meet their needs at the time? My fear is we will be left with 20 full time workers, a devastated community, and a desert environment which is permanently and irreversibly changed.	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).
11789-1	David Dillon; Laborers Local 155	The Laborers urge BLM to expand in its Scoping Document the full range of socioeconomic impacts related to the Lava Ridge Wind project, and to issue a finding that the proposed project will result in positive socioeconomic benefits to the surrounding communities and state of Idaho. Notably, because the applicant, LS Power and Magic Valley Energy, has laid out the large amount of economic benefit to numerous disadvantaged communities and employ hundreds of workers to complete this job. As a result, the proposed project will create thousands of high quality construction jobs over a multi-year period that pay family supporting wages and spur reinvestment in the host community and state of Idaho. Moreover, the creation of middle-class jobs for Idaho workers means the project will not increase demand on governmental services and subsistence resources, but in fact, generate additional governmental revenues and improve socioeconomic conditions. Lastly, high quality construction jobs promote equity because they offer a path to the middle class for workers who lack a college degree. This is especially salient in Idaho because the state has one of the lowest college attainment rates in the nation. Opportunities like partnering with LIUNA, assists in the rate of pay and the availability of affordable family health insurance for Lava Ridge construction workers which matters because projects that lack these benefits can result in an influx oflow-wage, and under- or uninsured workers who increase uncompensated care costs at hospitals, and rely on governmental subsidies in the host community. In this case, the potential of thousands of high quality jobs will support local healthcare institutions, and improve local socioeconomic conditions.	Project-related benefits to the local and regional economy (see EIS Section 3.6.3 [Local and Regional Economy]) were modelled using IMPLAN, which is a widely used economic impact analysis model. The BLM included an appropriate level of detail in the economic analysis that is based on the best available information and reasonable assumptions regarding employment and the costs of construction and operation. Including additional assumptions of potential wages or employment benefits would be speculative and unreliable.
11789-2	David Dillon; Laborers Local 155	In addition, by working on hiring local employers and workers from Idaho and surrounding communities, the workforce will be workers who live in Idaho and the surrounding community which will reduce housing and transportation burdens while ensuring workers' earnings are reinvested in the state and neighboring communities. Many projects analyzed by the Laborers before federal organizations claim to employ significant local workers, but typically import a majority out-of-state workforce. Moreover, economic models used by applicants assume 100% local employment despite actual low local employment. For example, developers typically rely on the IMPLAN model to quantify a project's cumulative local economic impacts, including induced impacts. IMPLAN's methodology assumes 100% local employment. In this case, by using these resources, local and state construction workers will benefit from job opportunities boosting the local and state economic effects of the project. Indeed, the employment oflocal and in-state labor matters because out-of-state workers typically limit	See response to comment 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		their local spending to daily per diems for food and lodging while local workers spend 95% of their earnings locally.1 The Lava Ridge Wind project will also provide a much needed boost to Idaho's construction industry which generates the greatest share of unemployment claims in the state.	
11789-3	David Dillon; Laborers Local 155	In order to ascertain the full range of the socioeconomic benefits of the Lava Ridge Wind project, the Laborers identify the following issues for further study: 1. To what extent does a project that creates construction jobs that pay high wages impact the local and state community when compared to a project that lacks any livable wage commitment?	See response to comment 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11789-4	David Dillon; Laborers Local 155	In order to ascertain the full range of the socioeconomic benefits of the Lava Ridge Wind project, the Laborers identify the following issues for further study: [...] 2. To what extent does a project that creates construction jobs that offer affordable family health insurance impact healthcare resources in the host community when compared to a project with high levels of under-insured or uninsured workers?	See response to comment 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11789-5	David Dillon; Laborers Local 155	In order to ascertain the full range of the socioeconomic benefits of the Lava Ridge Wind project, the Laborers identify the following issues for further study: [...] 3. To what extent does the availability of high quality construction jobs promote equity in underserved communities?	See response to comment 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11789-6	David Dillon; Laborers Local 155	In order to ascertain the full range of the socioeconomic benefits of the Lava Ridge Wind project, the Laborers identify the following issues for further study: [...] 4. To what extent does a project with greater rates of local and state worker employment impact local and state community resources when compared to a project with a low rate of local and state worker employment?	See response to comment 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11869-9	Raul Labrador, Josh Turner; Idaho Attorney General's Office	The Project harms the physical and economic well-being of Idahoans in several ways. First, an influx of temporary labor and federal dollars to construct the Project could cause a temporary housing shortage and lead to long-term increases in housing costs that price out Magic Valley residents. The rapid influx of short-term labor will strain local infrastructure and services like public schools and law enforcement. See draft EIS at ES-xix.	EIS Section 3.6.2 (Community Services, Employment, and Housing Availability) has been revised to include additional details regarding the anticipated effects of non-local construction workers on community services and housing. The analysis has been revised to clarify assumptions regarding where non-local construction workers would reside within the regional analysis area, what type of housing accommodations would be available to them, and how many workers would realistically be expected to bring children and family members with them. EIS Section 3.6.2 (Community Services, Employment, and Housing Availability) has been revised to include more contextual information regarding current housing availability and housing affordability in the analysis area that allows for more detailed comparisons between existing conditions and the effects of the Proposed Action.
11869-11	Raul Labrador, Josh Turner; Idaho Attorney General's Office	[The draft EIS Ignores Idaho's Sovereign Interest in its People.] Third, a short-term influx of federal dollars threatens to create a boom-bust economic cycle in the Magic Valley region. The draft EIS projects that the Project will bring in $277 million during its two years of construction, but only $15 million per year during the Project's operation. draft EIS at ES-xix.	"Boom and bust" refers to a period of rapid economic growth that is abruptly followed by one of economic decline. The short-term and long-term economic effects of the Proposed Action and alternatives are presented in EIS Sections 3.6.3 (Local and Regional Economy) and 3.9.1 (Grazing Allotments and Range Socioeconomics). Section 3.6.3 describes how local and regional economies would experience economic benefits during construction and operation because of indirect and induced jobs and tax revenues. The economic benefits of the project would be distributed amongst non-local workers (i.e., construction jobs), local communities (i.e., spending on goods and services) and local or state governments (i.e., taxes). Although the short-term economic benefits of construction would outweigh the long-term benefits of operation, in terms of annual economic output and tax revenues, many of the short-term economic benefits would be distributed outside of the local economy (i.e., to state governments or non-local workers) and the project would continue to provide a net benefit to the local and regional economy over the long term, albeit to a lesser degree than during construction. For these reasons, the transition from construction to operation is not expected to cause any significant decline and de-stabilization of the local or regional economy.
11869-15	Raul Labrador, Josh Turner; Idaho Attorney General's Office	[The draft EIS Ignores Idaho's Sovereign Interest in its People.] Eighth, the Project will have a generation capacity of 1,000 megawatts or more. DEIS, Introduction. This could tax the energy grid and threaten the stability and predictability of Idaho's energy supply, but the draft EIS doesn't consider this, or even mention it.	See response to comment 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11873-6	Mary Schwartz, Frank Schwartz	6. This project will have very little economic benefit to Idaho or its residents. While the DEIS Table 2.4-1 provides estimated ranges of construction personnel and operations personnel for each alternative, much of the construction labor work force would not be local labor, but instead semi-skilled laborers and contractors and equipment from outside of the area that specialize in wind farm installation. The operations staff is very minimal, and again, likely to be primarily imported rather than local residents. While there would be a few jobs available for local companies and laborers during the construction phase and possibly operations, the small number of local employees and contractors will have an insignificant benefit to the local area or Idaho as a whole. Any economic benefits to the Idaho economy from the transient workforce during construction are short-lived. Table ES-2 includes a section on socioeconomics, which also overstates the potential benefits from spending and tax revenues. It is normal for the majority of the wind farm components to be imported from overseas (China or other), so there is also little, if any, benefit to US manufacturers from this wind project. The DEIS portrayal of jobs and economic benefits associated with this wind farm proposal is not transparent and is very misleading.	Project-related benefits to the local and regional economy (see EIS Section 3.6.3 [Local and Regional Economy]) were modelled using IMPLAN, which is a widely used economic impact analysis model. Section 3.6.3 specifies that direct jobs and associated labor income would be distributed to non-local workers who would reside within the analysis area during construction, whereas much of the indirect and induced jobs would be distributed to locals because of spending on goods and services within the analysis area. Therefore, the relative distribution of economic benefits between locals and non-locals is correctly described in the EIS analysis.

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11915-8	Kim Peyman	Furthermore, these same pro-wind farm people may be excited by the prospect that the wind farm will bring jobs and revenue to the area. Over the estimated four-year construction period, this proposal will create the largest wind farm in all of North America. I say, “No Thank You” again! I cannot dispute that revenue will likely increase with the influx of their workers, but as for the jobs, I am not sure how many local residents are skilled in erecting wind turbine towers. I am sure that some residents with particular skills will get hired, but not in the numbers we are led to believe. We see it all the time in Shoshone, the company pickups from other states heading up North to build someone’s new home or whatever it may be. I further question if the wind farm company would even want to train a new, small army of local workers when they already have employees that know the business. I say that they are using this as a selling point, a false promise, to entice our community into permitting this atrocity to take root in the most literal sense of the word.	See response to comment 1689-8 (see in Table A-3h, Environmental Justice and Socioeconomics).
11926-5	Name Not Provided, Susan Jesser	Jerome County has large LEP (limited English proficiency population and the draft EIS was not translated into Spanish. A Hispanic friend told me the Jerome area is nicknamed “Little Mexico.” This concern should be investigated by the Federal Coordination and Compliance Section of LEP.gov and Department of Interior.	See responses to comments 11982-1 and 12398-5 (see in Table A-3h, Environmental Justice and Socioeconomics) and see response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11963-3	Jeff Fujioka	Projects like Lava Ridge windfarms may be a better alternative environmentally and funding via private for-profit enterprises perhaps is the only way the country can have environmentally responsible energy production given the present political situation. But it sounds like the electricity Lava Ridge will produce will provide little benefit to Idahoans, and the electricity will be sold to the highest bidder, probably to areas like Los Angeles, Phoenix maybe. The benefit would go to the for-profit investors of the Lava Ridge project. The State of Alaska has somehow negotiated with the oil companies a tax on the many barrels of oil pumped out of Alaska. This tax has certainly not hurt the profitability of these companies. If Idaho could somehow negotiate a tax on the kilowatts of electricity produced by Lava Ridge that is exported from the state, this tax could supplement state government operations currently funded by taxing individuals. It is my understanding that Idaho has a State income tax that could be reduced by taxes on exported wind energy. I would not recommend eliminating the State income tax, which Alaska has done, reduce the rate, but keep in place. Alaska has run into problems since oil revenue prices have reduced and the State has difficulty funding programs that were built with the State income tax before the oil started flowing.	The BLM’s purpose and need for action arises from the BLM’s responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The commenter is suggesting state-wide policy changes related to energy production and export, which are outside the scope of this NEPA analysis and are also outside of the BLM’s jurisdiction by law as a federal agency. The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. In accordance with CEQ’s NEPA regulations, the BLM analyzed the potential effects of the Proposed Action and alternatives on several different resource topics identified through internal and external scoping including but not limited to natural resources, cultural and historic sources, and socioeconomics. With respect to the economy, the BLM analyzed the potential economic effects of the project in EIS Section 3.6 (Environmental Justice and Socioeconomics). The BLM will make a reasoned choice among the alternatives based on the EIS analysis for all resources, and the BLM cannot determine significance for a proposed action based on economic effects alone.
11968-2	Cheryl Sandy	Psychologically we are being pushed to comply with the "Green New Deal" Biden administration's blown out of proportion hysteria. Biden has shut down Part of our oil industry. We were energy independent and now we are dependent on the Middle East and other nations to supply our energy needs. There are far more effective and economical ways to meet our energy demands. The Windmills are not energy or financially effective. The Windmills require federal subsidies.	In accordance with CEQ’s NEPA regulations, the BLM analyzed the potential effects of the Proposed Action and alternatives on several different resource topics identified through internal and external scoping including but not limited to natural resources, cultural and historic sources, and socioeconomics. With respect to the economy, the BLM analyzed the potential economic effects of the project in EIS Section 3.6 (Environmental Justice and Socioeconomics). The BLM will make a reasoned choice among the alternatives based on the EIS analysis for all resources, and the BLM cannot determine significance for a proposed action based on economic effects alone.
11970-1	Janet Keegan	3.6.2.2.3: EO 12898 refers to Environmental Justice: The DEIS clearly disregards this Executive Order as the project will trample, decimate and destroy forever cultural resources, known and unknown, relative to the indigenous peoples that traveled, utilized and revered the project area for centuries. The descendants of these people residing on the Fort Hall Indian Reservation and Duck Valley Indian Reservation are considered “minority and low-income” as described in the EO. Summary of Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations | US EPA The large population of Hispanics that reside in Jerome, Lincoln and Minidoka Counties have not been considered whatsoever in the DEIS. The DEIS was not available in Spanish, the public meetings by the BLM did not provide for our large community of Spanish speaking residents. The descendants of the Minidoka War Relocation Center (MWRC) are recognized in the DEIS, however referring to this group as “visitors” is disingenuous. The BLM made a great effort to recognize the impact of the proposed project on the Japanese American (JA) community, but it was delayed reaction and an insult to the JA community. BLM and the developer was clearly aware of the MNHS and MRC and the adverse effects a project of this magnitude would have. The developer was entangled in a situation with a transmission line crossing through the MNHS in 2008. The issue was resolved legislatively in 2009. The JA community was notified of the Lava Ridge project in the middle of 2021.	See responses to comments 11535-50, 6340-1, and 11982-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
11978-32	Magic Valley Energy, LLC	Section 3.6.2.2.2 – Environmental Justice and Socioeconomics: Japanese American Community 28. The DEIS states: “Any adverse effects to Minidoka NHS and Minidoka WRC would also have the potential to cause psychological harm to members of the Japanese American community by perpetuating and reinforcing existing feelings of distrust and being dishonored within the community.” a. MVE Comment: MVE sympathizes with all those impacted by the wrongful incarceration of Japanese-Americans at the Minidoka Internment Camp, and we support those programs, groups, and services affiliated with the remembrance and education that surrounds the Minidoka War Relocation Center and the Minidoka National Historic Site. Although the DEIS evaluates impacts to Minidoka associated with the various action alternatives, regarding psychological impacts, the U.S. Supreme Court found that the NEPA process cannot properly assess psychological impacts from a Project; thus, the above-referenced language from the DEIS should be removed. This stems from the decision of Metro Edison Co. v. People Against Nuclear Energy, 460 U.S. 766, 777-78 (1983), where the U.S. Supreme Court states, among related holdings, that “It would be extraordinarily difficult for agencies to differentiate between ‘genuine’ claims of psychological health damage and claims that are grounded solely in disagreement with a[n agency] policy.”	The potential for the project to cause psychological harm to members of the Japanese American community was determined through direct feedback received during BLM’s engagement efforts with the Japanese American community. In addition, EIS Section 3.6.1 has been revised to include a new literature citation that supports the idea of there being extended consequences of historical trauma on former incarcerees. Therefore, the statement in the EIS is not considered speculative and will remain in the analysis.

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11978-35	Magic Valley Energy, LLC	Section 3.6.2.2.2 – Table 3.6-2: Impacts to Dispersed Environmental Justice Communities 31. MVE Comment: This summary table, and the subsequent analysis of Alternative E, states that all Alternatives would have disproportionately high and adverse impacts to the Japanese American community and Native American tribes from a number of effects, including increased noise. This contradicts Section 2.5.6.2.5, which states that: "The auditory component of the APE for Alternative E would not reach Minidoka WRC, and therefore, results in 100% less potential auditory impact to Minidoka NHS and Minidoka WRC than for Alternative B, and proportionally less than any of the other action alternatives." As such, Table 3.6-2 and Section 3.6.2.2.5 should be revised to clarify that Alternative E would have no auditory impacts to the Minidoka NHS or the Minidoka WRC.	Section 3.6.1.2.2 has been revised to clarify which effects would be reduced versus eliminated under each of the action alternatives.
11982-1	Joan Hurlock	A memorandum to heads of federal departments and agencies accompanied Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". The memorandum emphasized the importance of public participation in the NEPA process and states "each Federal agency shall provide opportunities for community input in the NEPA process" and the agencies are directed to "identify potential effects and mitigation measures in consultation with affected communities, and improve the accessibility of meetings, crucial documents, and notices". (italics mine) This Executive Order requires that each agency shall, "wherever practicable and appropriate, translate crucial public documents, notices and hearings, relating to human health or the environment for limited English speaking populations", and should work to "ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public." Also, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", requires Federal agencies to provide meaningful access for people with Limited English Proficiency. Noticeably absent from the Lava Ridge Wind Project (LRWP) NEPA process is any attempt to involve the non-English speaking community residing within the three counties in the LRWP impact area. This process included: pubic scoping, the BLM's open house meetings, Magic Valley Energy's community outreach events, BLM notices of upcoming meetings, and the actual DEIS document. A significant percentage of the population in these counties – Lincoln, Jerome, and Minidoka – is non-English speaking or Limited English Proficiency, with Spanish being the primary minority population language. There has been no outreach to, or communication with, this particular community. I have attended a majority of BLM's online and in-person meetings, and have been to MVE's community outreach events. None of the meetings have had translators present, no advertising has been directed to Spanish language media sources and, until just a few days ago, no written documents were provided in Spanish. The members of the BLM Resource Advisory Committee, Lava Ridge Subcommittee had representatives from various affected stakeholder groups including: Japanese/Americans, Native American Communities, Wildlife, county commissioners, grazers, and recreational groups. Absent from this subcommittee was a representative from the Minority or Limited English Proficiency constituencies. The counties (Jerome, Lincoln, and Minidoka) in the impact area of the Lava Ridge Project have a large percentage of Hispanic and Latino people*. These residents have not been informed about this project, nor been provided information in Spanish in order to have the ability to submit an informed comment regarding the LRWP. I personally have made more effort to inform this community about Lava Ridge than both the BLM and Magic Valley Energy. I spoke about the LRWP on the Spanish radio station (99 .1 FM, La Perrona), I have provided information and documents to leaders in the Hispanic community, and along with other individuals, have gone door to door in the Jerome area, to invite people with Limited English Proficiency to Stop Lava Ridge events. Until people with Limited English Proficiency (LEP) have been fully informed about the Lava Ridge Wind Project, documents have been made available at least in Spanish (there is a significant Basque, and Portuguese speaking community in the area as well), and people with LEP have been afforded the opportunity and ample time to comment on the DEIS, Alternative A, the No Build Option, must be selected. The BLM must comply with Executive Orders that address environmental justice in low-income and Minority populations and improve access to persons with Limited English Proficiency. *Hispanic or Latino Population Jerome County: 38.3% Lincoln County: 32.5% Minidoka County: 36.0% Source: www.census.gov <https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.census.gov%2F&data=05%7C01%7Cblm_id_lavaridge%40blm.gov%7Cc41e15729c774463887e08db41c7cac8%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638176098584409532%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=PD6a2KuHzBkMZZUL1hh5apWoblQ7Hpef1d5i1Bm7ZGg%3D&reserved=0>	EIS Section 3.6.1 (Environmental Justice Communities) has been revised to describe the percentage of the analysis area population with limited English proficiency. The BLM published notices for public scoping and public comment periods in both English and Spanish. In addition, Spanish speakers were present at public scoping meetings and draft EIS open-house meetings. See also response to comment 12398-5 (see in Table A-3h, Environmental Justice and Socioeconomics) and see response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11991-3	Julie Abo	"About half of all census tracts and block groups within the analysis area were identified as a low-income population, minority population, or both. (page 3-192)" The fact that "half of all census tracks and block groups within the analysis area were identified as low-income population, minority population, or both" raises an alarm. This pattern of federal projects negatively impacting low income and minority populations is highly unacceptable in 2023. Please refer to this reference: "How infrastructure has historically promoted inequality" https://www.pbs.org/newshour/politics/how-infrastructure-has-historically-promoted-inequality The Native American Tribes have already had cumulative negative effects over the past centries due to "agricultural land use, private property development, livestock grazing and associated infrastructure, motorized access, existing linear features (e.g., roads, transmission lines, railroads), electrical substations, existing wind and solar development, irrigation canals, aquifer recharge sites and monitoring wells, ESR and vegetation treatment projects, and existing ROW projects." This is unacceptable, particularly in light of Secretary Haaland's EO 14008 that aims to address "cumulative impacts on disadvantaged communities."	EIS Section 3.6.1 (Environmental Justice Communities) analyzes potential effects of the Proposed Action and alternatives on environmental justice populations. This analysis includes a discussion of potential cumulative effects on Native American populations. The referenced article does not contradict the EIS analysis or present new information that is relevant to the analysis. Identifying low-income or minority block groups within the analysis area is meant to describe the affected environment, and the mere presence of environmental justice populations within the analysis area does not necessarily mean that those populations would be subject to disproportionately high and adverse effects. Also see responses to comments 11535-49 and 11535-50 (see both in Table A-3h, Environmental Justice and Socioeconomics).

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11991-4	Julie Abo	I would also argue that Indigeouns peoples and Japanese Americans are disproportionately adversely affected because of multigenerational trauma passed on from historical negative treatment by the US government and Department of the Interior, therefore adding an additional layer of non-physicall impacts in this encounter wth the NEPA process and the BLM, a governmental entity of the United States and the LS Power's Lava Ridge Wind Project. (Racism, Culture and Trauma: The Japanese American Internment. A Teacher's Guide for the Children of the Camps Documentary by Satsuki Ina, PhD) Dr. Donna Nagata has also done research studies on this topic of multigenerational trauma of the Japanese Americans who were incarcerated during WWII and concluded that as a community, this shared history had very negative psychological impacts. See: Nagata, D. K., & Patel, R. A. (2021). "Forever foreigners": Intergenerational impacts of historical trauma from the World War II Japanese American incarceration. In P. Tummala-Narra (Ed.), Trauma and racial minority immigrants: Turmoil, uncertainty, and resistance (pp. 105–126). American Psychological Association. https://doi.org/10.1037/0000214-007 The multigenerational trauma impacts noted as silence about emotional issues, hoarding, alcoholism and workaholic behavior have even presented in fourth generation Japanese Americans with Dr. Nagata's more recent study. Nagata, Donna. "Intergenerational Impacts of the World War II Japanese American Incarceration." Uploaded by University of Michigan, April 6, 2021, https://www.youtube.com/watch?v=AufjbkE9xlQ The category of "environmental social justice communities" has been decades in the making. However, I would argue that this is not just another category to tick off in the checklist of the NEPA process, but rather a framework by which the NEPA process should be guided by. Shouldn't we learn the well-known lessons of the past federal infrastructure projects, such as the highway system, that negatively impacted communities of color and low-income and center the interests of all groups in the formation and conceptualizing of large sustainable energy projects?	The BLM has reviewed the referenced article and will incorporate it into EIS Section 3.6.1 (Environmental Justice Communities) to provide additional context regarding the extended consequences of historical trauma on former incarcerees.
11991-16	Julie Abo	I wholeheartedly support sustainable energy. I agree with the Biden Administration's policy to support and encourage sustainable energy projects, but we should also be collaborating with environmental social justice communities and the greater population, particularly indigenous peoples (identified as "Native Americans" in the DEIS) on deciding what kind of sustainable energy is the best fit for the community, locally and dispersed. This process is not collaborative.	See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).
11991-19	Julie Abo	Having a smaller footprint does not reduce the overall impact on affected communities of people. This kind of solution reflects a lack of cultural competence and a misunderstanding of these irreversible impacts. Simply making the physical size of the project smaller does not make the impact smaller. This cannot be quantified in this way. Whether wildlife, Native American, Japanese American, American, the physical effects of the project will have a lasting negative impact on these communities. (See page ES xviii Environmental justice communities and ES xxii) While the DEIS states "decreased degree of visual change.." and "reduced visual change due to increased distance" this is only a reduction of visual effects which does not resolve the issue of impacts to the "setting, feeling and visitor experience at the Minidoka National Historic site and for Native American Nations." No matter what the size of the visual impact, the negative impact persists and is irreversible. Although the visual and auditory impact numbers are reduced, it does not reduce the overall negative impact to these cultural resources. (see page 3- 183) The KOP negative visual impacts with a minimum of "moderate" are not acceptable.(page 3-206 -Table 3.6-3. Environmental Justice Key Observation Points) None of these poles or lines were included in the visual simulation of the KOPs: Alternative C 201 miles total 53 miles underground 148 miles overhead Estimated 2,664 poles Alternative E 145 miles total 38 miles underground 107 miles overhead Estimated 1,926 poles (page 2-6). It's clear these would have an impact on the setting, feeling and visitor experience at the Minidoka National Historic site and for Native American Nations. If there are expected projects in neighboring parcels of land, then shouldn't they be included in all of the simulations as cumulative effects? I am concerned that the neighboring projects are of the same size and scale. (See page 3-18) The visual change for all alternatives clearly has a negative impact on the viewshed and in effect, the immersive feeling of the incarceration site and the power of place that educates all who visit. (page 3-412) It is significant that a Traditional Cultural Property has been designated and the viewshed is part of this TCP.	The environmental justice analysis in Section 3.6.1 concludes that although the smaller footprint of some alternatives would reduce the magnitude of potential effects, disproportionately high and adverse impacts to the Japanese American community and Native American Tribes would still occur under all of the action alternatives. Cumulative visual effects from reasonably foreseeable projects in the surrounding areas are considered and analyzed in EIS Section 3.6.1.2.7. Also see response to comment 11454-2 (see in Table A-3y, Visual Resources).
12048-2	Karen Matsumoto	I enthusiastically support the proposed Greater Minidoka Area of Critical Environmental Concern (ACEC). This designation provides permanent protections for Minidoka as a historic site as well as other traditional uses of the land. This proposed designation should be considered by the BLM in the decision-making process.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12050-3	Roger LeRoy Miller	Then there is the question of how your group created a cost-benefit analysis of this project. I did not see any real analysis of this kind that accurately assessed the real cost to society of this project. I believe that you are violating existing environmental law.	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
12054-6	Kevin Emmerich	The Friends on Minidoka have submitted a nomination to create the Greater Minidoka Area of Critical Environmental Concern, in order to protect the cultural landscape that is visible from the Minidoka National Historic Site. This was intended to be a conservation alternative to the proposed wind project. While the nomination came in only a couple months ago, it should be considered significant new information and the BLM should extend this comment period and prepare an additional EIS that considers this alternative.	See responses to comments 12859-2 and 12859-16 (see in Table A-3h, Environmental Justice and Socioeconomics).
12054-11	Kevin Emmerich	Establishing a Greater Minidoka Area of Critical Environmental Concern would create a reason to raise the VRM Class to VRM Class II. Since the Minidoka National Historic Site has a cultural landscape and the viewshed disturbance would impact Craters of the Moon National Monument, the VRM Class could easily be upgraded to VRM Class II. A large sprawling wind project with 700-foot turbines would not be consistent with even VRM Class III let alone VRM Class II. In 2017, the BLM released a NEPA review for the Crescent Peak Wind Project	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		in Southern Nevada. Like the Lava Ridge Project, it would have been located next to a National Park Service unit – the Mojave National Preserve. Since the 1997 Las Vegas RMP designated the site a VRM Class III, a plan amendment was required to downgrade the VRM Class for this project. The turbines would have been about 600 feet tall, lower than what is proposed on Lava Ridge.	
12083-1	Adrian Arp	After studying the 4-volume Lava Ridge DEIS Report, conspicuously absent from the document is a thorough cost analysis of the different components of the project. This cost sheet should include the estimated costs of: raw materials, transportation, construction, facility operations, component manufacture, labor, decommissioning and mitigation efforts. The more one reads the DEIS, the more one realizes that the expense to build, operate, and decommission the project will be staggering! For the sake of transparency, and to give taxpayers assurance that the benefits of the Lava Ridge Project outweigh the risks and costs, the BLM should require Magic Valley Energy/LS Power to provide a balance sheet - "show me the money" in other words. Where is the Business Plan? Where is the list of projected and estimated costs – a detailed budget? How will this project be funded? Where is the balance sheet for the company? A profit/loss statement should be posted for the public to look over. How do we know this company has the funds to see this project through to completion? What is the amount of the Federal subsidies MVE/LS Power will receive? Cost projections should include: road material concrete wind turbine components and structures transportation of wind turbine components transmission lines wages and benefits for employees herbicides 126,000 pounds of explosives compensation for sage grouse fatalities fire suppression applicable licenses, permits, and fees biologists for surveys lease, rental, or purchase of heavy machinery and equipment fines for excessive eagle kills repairing/replacing damaged or contaminated wells water for dust control feed replacement for displaced cattle settlements of any liability lawsuits due to injuries or deaths and most importantly… funding alternative sources of water for agriculture, livestock and residential use if the Snake River Plains Aquifer is damaged. Due to rising inflation and higher interest rates, how will the Lava Ridge project even be profitable? What assurance do taxpayers have that MVE/LS Power won't go bankrupt when the time comes to mitigate everything that must be mitigated? The public has been told that MVE/LS Power will provide a bond to pay for the necessary mitigation plans, for example the cost of repairing and replacing damaged roads. If MVE/LS Power goes bankrupt, who will be responsible for any compensatory mitigation? Will the affected cities, counties, or state be responsible to cover any unpaid bills? Magic Valley Energy and LS Power – open up your books!	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
12136-3	Diane Honda	The implementation of the Lava Ridge Wind project is contrary and insensitive to cultural competency mandated by President Biden's Executive Order on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whitehouse.gov%2Fbriefing-room%2Fpresidential-actions%2F2023%2F02%2F16%2Fexecutive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government%2F&data=05%7C01%7Cblm_id_lavaridge%40blm.gov%7C29b6d9aeadab438769b508db4135cc85%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638175471547161429%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=OM5FuUXpEshKlWGT4acl3%2FNXbt5Qqp8jyc%2FiYsr4%2B9U%3D&reserved=0> A section referencing this executive order should be added the DEIS as well as updating DEIS Alternatives to ensure they meet the specifications of this order.	See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).
12151-2	Matt Reifer	my biggest concern is the loss in value of my property. I live just 1.5 miles east of the proposed project, so not only would my view be distorted, but there would be major impacts to my land due to the loss in the number of raptors and bats, the number of rodents and insects would most likely increase tenfold on my property. My other concern is the possibility of additional dust during high winds due to the hundreds of miles of new dirt roads being built, and the possibility of the groundwater dropping and well water quality. My father homesteaded the land I live on, and he also built the house and other outbuildings on the property. I have also lived and worked in many other places in the United States over the past 30 years, and most people would consider those places paradise. However, three years ago I had the opportunity to return to my home here in Idaho to live and work. I did not come back here because I had to, I came back because there's no other place in the world more desirable to live than here. If these wind turbines are built, it would destroy my life, and the home my father built. Please have LS Power tell me how they will compensate me for my loss.	All of the issues mentioned by the commenter are analyzed in EIS Sections 3.16 (Visual), 3.3 (Avian and Bat Species), 3.2 (Air Quality), 3.17 (Waters Resources), and 3.6.4 (Residential Property Values). The commenter has not identified any deficiencies in these analyses. Also see response to comment 11535-55 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding property values.
12159-2	Marie Matsuno, Dan Sakura	I also support the petition from the Friends of Minidoka to designate the Greater Minidoka Area of Critical of Environmental Concern (ACEC). Minidoka is a sacred place for Japanese Alaskans, like me, who have both Japanese and Alaska Native ancestry (Aleut).	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12159-4	Marie Matsuno, Dan Sakura	The DEIS fails to analyze the impacts of the project on Japanese Alaskans, including Tlingit, Haida, Tsimshian, Aleut, Inupiat and others, who were wrongfully incarcerated. Because of the unique circumstances of the Japanese Alaskans, many families were separated from their fathers further compounding the harmful impact of the incarceration on Japanese Alaskans. As noted by a multi-agency Memorandum of Understanding (MOU) signed by the Department of the Interior: … the relocation of many Indian Tribes, the Native Hawaiian Community, and Indigenous peoples from their original homelands has had traumatic impacts on those people collectively at the time, and has enduring negative impacts on the social, cultural, spiritual, mental, and physical wellbeing of Indian Tribes, the Native Hawaiian Community, and Indigenous peoples today. The Sacred Sites MOU states the that "Federal agencies, including those that approve or fund projects, are responsible for assessing and considering the potential impacts of their decisions on sacred sites and historic properties of	See response to comment 11315-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		traditional cultural and religious importance." I encourage BLM to accurately describe the baseline of the Japanese Alaskan community and the adverse impacts of the wind project on Japanese Alaskans and include relevant analysis of the project on Alaska Native survivors and descendants and include them as a separate category of "Dispersed Environmental Justice Community," throughout the FEIS.	
12159-6	Marie Matsuno, Dan Sakura	Federal Trust Responsibility. Please describe the Department of the Interior's trust responsibility to protect Alaska Native Tribal interests with regard to the Japanese Alaskan community, which is a dispersed environmental justice community. Please explain how BLM Alternatives C & E's disproportionately high and adverse impacts on Alaska Native sacred ground are consistent with this trust responsibility.	See response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
12159-7	Marie Matsuno, Dan Sakura	Area of Critical Environmental Concern: In announcing the Sacred Sites MOU, I appreciate Sec. Haaland's leadership to preserve sacred sites important to Indigenous people and her support for actions to protect Indigenous Sacred Sites: "Since time immemorial, the Earth's lands and waters have been central to the social, cultural, spiritual, mental, and physical wellbeing of Indigenous peoples. It is essential that we do everything we can to honor sites that hold historical, spiritual or ceremonial significance …. The Interior Department is committed to protecting these sacred sites from desecration, while at the same time collaborating with Indigenous communities to increase access and ensure good stewardship of their lands." The MOU includes guidance to federal agencies to avoid actions that could damage sacred sites and to take pro-active measures to ensure good stewardship: "agencies should take a forward-thinking approach and not only seek to avoid adverse actions, but collaborate with Indian Tribes and Native Hawaiian organizations to ensure good stewardship of their lands and allow their rightful access and use to certain public lands …"6 The further MOU states that sacred sites include broader landscapes with cultural significance to Indigenous People: "Participating Agencies acknowledge that sites sacred to Indian tribes and the Native Hawaiian Community often occur within a larger landform or are connected through physical features or ceremonies to other sites or a larger sacred landscape." The proposed Greater Minidoka ACEC is a sacred landscape for Alaska Natives along with the Japanese American community. I encourage the BLM to begin a public planning process to designate the Greater Minidoka ACEC, as required by the Sacred Sites MOU, the Federal Land and Policy Management Act, National Park Service Organic Act, Minidoka National Historic Site authorizing legislation and other relevant authorities.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12182-2	Mark Jones	Over the years we have had Farm and Ranches for sale and have worked with buyers looking at Farm and Ranches located directly by windmill farms. Those Farm and Ranches took a longer time to sell, and with a discounted price. The biggest concern was the image of the area with the windmills and the noise. The other big concern is the Farms and Ranches that are by the transmission lines have reported that their irrigation pivots would be breaking down more frequently due to electronic pump panel boxes and motor damage due to the overhead high voltages. Therefore, it is in my opinion that this project would have a sociological and locational negative factor and would send the surrounding properties into declining values, not only for the Farm and Ranches, but also, the residential acreages.	See response to comment 11535-56 (see in Table A-3h, Environmental Justice and Socioeconomics).
12307-23	Dean Dimond	Need analysis of adverse economic impacts to counties, communities, tribes, and state, Need up to date economic impact analysis with cost /benefit to taxpayer in federal PILT and other payments to counties,	The potential for adverse economic effects are discussed in the context of the livestock grazing economy (Section 3.9.1), residential property values (Section 3.6.4), and hunting spending (AIB-29 in EIS Appendix 3). Also see response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
1233-1	Carolyn Dimond	We cannot find anywhere in the DEIS that protects Magic Valley contractors and other businesses/jobs from loss & bankruptcies because of overuse of our cement and other building supplies. The past few years there have been already severe shortages, causing high costs and many delays in construction projects throughout the whole area. A project the size of Lava Ridge would no doubt take what is c. I,I.5(. 1'1<'/\'l. tJ"" available, because they seem to have deep pockets and are willing to bribesWith , leaving the local economy with no ability to buy or afford the supplies necessary to survive. This becomes very personal to those of us who have family members in these businesses.	See response to comment 2100-4 (see in Table A-3h, Environmental Justice and Socioeconomics).
12338-14	National Park Service	Section: 3.6.2.4 Environmental Justice and Socioeconomics Page: 3-216 The NPS suggests that the compensatory measures apply to all action alternatives rather than just Alternative B. Revised text could state: "The following compensatory mitigation measures could be applied to all action alternatives if the BLM determines it is warranted (see EIS Appendix 4)."	Revisions made as suggested.
12390-2	Jon McGregor	Studies have shown there is a property value decrease were wind turbines have been built. 3.6.6.2.2 of the Dies states, studies indicate that proximity to wind energy facilities and and wind turbine visibility can negatively influence property values in some cases (Gibbons 2015; Heinyzelman and Tuttle 2012; SunakMadlener 2013)Gibbons (2015) evaluated the effects of Turbine visibility on home prices in EnglandWales and found that turbine visibility reduced home prices by approximately 6% to 12% (depending on size of wind facility) where turbines were visible within approximately 1.25 miles the effects on property values decreased. There have not been any wind turbines of this size used before, therefore one would suggest that these numbers climb. I do not want my property values to fall.	The EIS analyzes potential effects on residential property values in EIS Section 3.6.4 (Residential Property Values). As stated in Section 3.6.4, the likelihood or degree to which property values may or may not be affected cannot be predicted with any certainty. However, the analysis concludes that there is a potential for property values in the analysis area to be affected by the project.
12398-1	US Environmental Protection Agency	The DEIS describes communities with EJ concerns based on BLM analysis tools. EPA recommends that the FEIS analysis include the use of EPA's interactive web-based screening tool, the Environmental Justice Screening and Mapping (EJScreen, Version 2.1) Tool6, to further evaluate where EJ concerns may exist. EPA	The BLM's environmental justice analysis in Section 3.6.1 (Environmental Justice Communities) complies with EO 12898 and the BLM's environmental justice guidance document (IM 2022-059), issued in September 2022. IM 2022-059 allows for the use of U.S. census data when identifying low-income and minority populations within

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		considers a project to be in an area of potential EJ concern when an EJScreen analysis for the project area shows one or more of the twelve EJ Indices at or above the 80th percentile in the nation and/or state. For example, the EJScreen tool indicates that households with limited English- speaking abilities are in the 80th percentile or higher in all three counties in the project area. Strategic outreach tailored to these limited English-speaking communities may be required to achieve meaningful engagement in the project planning, during NEPA analysis, and decision making. Another tool available to help agencies and decision makers screen for potential EJ concerns is the Climate and Economic Justice Screening Tool (CEJST)7. EJScreen and CEJST are complementary tools8.	the analysis area, and although EJScreen or CEJST are data sources that the BLM can electively use to support their analysis, particularly when characterizing the affected environment for environmental justice communities, the BLM is not required to use these data sources. Additionally, EJScreen (Version 2.1) and CJEST are aggregate tools that use the same U.S. census data that were used in the EIS analysis, and CJEST is only applicable for Justice40 projects. Revisions have been made to EIS Section 3.6.1 (Environmental Justice Communities) to incorporate updated definitions and thresholds for identifying low-income and minority populations, using U.S. census data. With these revisions, the EIS is in full compliance with EO 12898 and IM 2022-059. Section 3.6.1 has also been revised to incorporate additional EJScreen index data to further characterize the affected environment for identified environmental justice communities in the analysis area.
12398-3	US Environmental Protection Agency	In consideration of the potential disproportionate impacts by the proposed project to communities with EJ concerns, EPA provides the following recommendations for the FEIS: • Continue to take steps taken to meaningfully engage communities with EJ concerns in the NEPA and Section 106 processes. The Promising Practices for EJ Methodologies in NEPA reviews12 is a useful resource to ensure people have the opportunity to participate in decision making; community feedback is effectively utilized and reflected in the decision-making process; and decision makers seek out and facilitate the involvement of those potentially affected. • Describe how the proposed project will be addressing the disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on disadvantaged communities, as well as the accompanying economic challenges of such impacts, consistent with Executive Order 14008 that requires federal agencies to “make achieving environmental justice” part of their missions. Also consider including E.O. 14008 on the list of other Federal E.Os. that will guide evaluation and implementation of the proposed action.13	See response to comment 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).
12398-5	US Environmental Protection Agency	• Consistent with CEQ’s EJ Guidance, EPA recommends that the NEPA analysis describe the distribution and magnitude of disproportionate impacts to communities with EJ concerns as a factor in determining the environmentally preferable alternative in the Record of Decision. Include the concerns and recommendations received from the affected communities, the magnitude of the environmental impacts associated with alternatives that have a less disproportionate and adverse effect on communities with EJ concerns. Describe mechanisms to avoid impacts, mitigate impacts and potential mitigation measures, as well as related affected communities input. • Consistent with CEQ’s EJ Guidance, EPA recommends that the NEPA analysis research and analyze multiple and cumulative environmental hazards to communities with EJ concerns. This include evaluating of potential construction and traffic impacts on communities with EJ concerns. As part of the assessment, EPA recommends the development of a survey to focus on how community members utilize roadways and obtain input from the community regarding potential impacts of increased traffic congestion, detours, and closures. EPA recommends considering use of translators that speak local languages to ensure greater and more meaningful engagement of communities with native languages other than English. • In developing mitigation measures for potential disproportionate impacts, consider mechanisms to minimize impacts by the proposed project to low-income communities such as: maximizing the number of local hires for the project work, e.g., provide job certified training within low- income areas and prioritize recruitment of local workers within these areas for project related work; offer transportation for local workers; fund childcare or childcare subsidies for workers and project outreach events; and make language translation services available.	The environmental justice analysis (EIS Section 3.6.1) has been prepared in accordance with EO 12898 and IM 2022-059. The analysis describes the magnitude and distribution of effects to environmental justice populations and compares effects across all of the alternatives. Mitigation measures are also discussed, including those which have been developed specifically to address the concerns expressed by members of Japanese American and Minidoka-Connected EJ communities. The Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Minidoka NHS and greater Minidoka WRC area in response to the concerns expressed by members of the Japanese American and Minidoka-Connected EJ communities. The Preferred Alternative would also reduce the potential magnitude of impacts for all EJ communities and residences to the greatest extent compared to all other action alternatives, largely due to the smaller footprint of the siting corridors relative to all other action alternatives (see EIS Section 3.6.1.2.6). See responses to comments 11535-50 and 11982-1 (see in Table A-3h, Environmental Justice and Socioeconomics) and see response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12398-24	US Environmental Protection Agency	EPA supports the development of alternative and environmentally sustainable sources of energy, such as wind power. In reviewing the DEIS, EPA identified that this project has the potential to disproportionally impact communities with environmental justice (EJ) concerns, including Japanese American, tribal, minority and low-income communities, and recommends such impacts be avoided in the preferred alternative in the FEIS. Specifically, EPA provides the following key recommendations to address impacts to communities with EJ concerns in the FEIS: • Further evaluate and identify communities with EJ concerns who may be impacted by the proposed project utilizing EPA’s EJ Screen tool. • Clearly articulate how the alternatives align with the project purpose and the opportunities to avoid disproportionate impacts to communities with EJ concerns. • Continue to coordinate with communities with EJ concerns who are disproportionately impacted by the proposed project; adjacent land owners; tribes; and federal and state agencies. Include in the FEIS a description of the efforts to engage these communities when: analyzing for disproportionate impacts; developing ways to avoid, mitigate and minimize those impacts; and the outcome of the engagement efforts on the proposed project. • Consistent with CEQ’s EJ Guidance Under NEPA1, describe the distribution and magnitude of disproportionate impacts to communities with EJ concerns as a factor in determining the environmentally preferable alternative. Include the views received from the affected communities and the magnitude of the environmental impacts associated with alternatives that have a less disproportionate and adverse effect on communities with EJ concerns.	See responses to comments 12398-1 and 11535-50 (see in Table A-3h, Environmental Justice and Socioeconomics).
12469-11	Mike Telford	Ability to continue farming and living near the project Our farm relies on aerial applicators to apply products to our variety of crops. The most sensitive of the crops, is certified seed potatoes. The landing strips for the applicators must be reasonably close because of the heavy loads of water and material that they must take off with and then return to the strip for another load. The landing strips are on the east side of Kimama Butte west of 750 west. The proposed project would make it near impossible for the planes to function safely. They tell me that they need at least one mile set back from the farms to safely apply products to my farm. Any requirement to fly around windmills to get to my place may make it economically impossible to do. They now climb over the Buttes to get to Hidden valley and my farm. This alone could put us out of business. The strip of BLM lands directly west of our farm is a designated stock drive way and is approximately one to one and a half miles wide. The	AIB-15 in EIS Appendix 3 states that the while the potential for wake turbulence from wind turbines has been documented, it is well within the ability of pilots to avoid this potential hazard. Pilots are instructed about the effects of turbulence and wake and are trained how to recognize situations that might create the turbulence, avoidance, and/or how to handle it. Therefore, while the project would not preclude crop dusting in the project vicinity, it would require pilots to assess situation-specific risks when flying crop dusting or other small aircraft. None of the information provided by the commenter contradicts what is stated in the EIS.

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		Robertson family farms lies west of that. With one mile from my farm and one mile the Robertson's farm there is no place for wind turbines in that area. The DEIS states applicators planes can fly at "their Discretion." That is not only unbelievable but unacceptable. (please see Aviation comments by the pilots)	
12859-2	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Summary and Petition to designate Greater Minidoka Area of Critical Environmental Concern (ACEC). We propose the BLM establish a Greater Minidoka ACEC (Attachment A) to protect approximately 237,000-acres of BLM lands surrounding the Minidoka NHS and Minidoka War Relocation Center. Along with multiple uses and valid existing rights, the Minidoka ACEC will protect a sensitive and culturally important area for Minidoka survivors, descendants, the Japanese American community, and our country. The historic Minidoka War Relocation Center and viewshed have been identified as Traditional Cultural Property (TCP) eligible for listing in the National Register of Historic Places (NRHP) by the Idaho State Historic Preservation Officer (SHPO).8 (Attachment B) The proposed ACEC is located in southcentral Idaho, between the Pioneer Mountains, the Snake River and Craters of the Moon National Monument. It includes scenic and cultural values of significant national importance, which are necessary to interpret the experiences of Japanese Americans and Alaska Natives incarcerated at the Minidoka War Relocation Center during World War II. The ACEC is needed because the BLM's Monument RMP "does not establish Visual Resource Management (VRM) classes or associated management objectives for BLM public lands in the siting corridors,"9 as required by BLM policy.	FLPMA requires the BLM to "give priority to the designation and protection of areas of critical environmental concern [ACEC]" in the development and revision of land use plans (43 USC 1712(c)(3)). The BLM conducts ACEC review, full evaluation, and designation through land use planning processes. This project-specific NEPA review of MVE's application for the project is not associated with the development or revision of a land use plan; land use plan development or revision requires its own NEPA process. Coincident to the draft EIS public comment period, the BLM received a proposal for the Greater Minidoka ACEC from Friends of Minidoka. In accordance with the BLM ACEC Manual (BLM 1988), the BLM has conducted preliminary evaluations of two potential ACECs (the proposed Greater Minidoka area and also the Minidoka WRC boundary; see EIS Appendix 13 for these preliminary evaluations). The BLM preliminarily evaluated these two areas for relevance and importance criteria required for ACEC designation (BLM 1988) and to identify whether interim management is warranted to protect values contributing to the relevance and importance criteria. A full evaluation of a proposed ACEC is outside the scope of the project's NEPA process, the purpose and need of which is to respond to MVE's application (EIS Section 1.2). Although the Greater Minidoka and Minidoka WRC areas are not currently designated as ACECs, the EIS analysis evaluates and discloses impacts to resources, which are described in the Friends of Minidoka ACEC proposal, such as visual resources, cultural resources, and natural resources. These resources are also preliminarily evaluated by the BLM in EIS Appendix 13. Having conducted the preliminary evaluations (EIS Appendix 13) and in response to comments on the draft EIS regarding proposed ACECs, the BLM is applying interim project-specific management to the potential Minidoka WRC ACEC. Analysis of impacts to the potential ACEC for Minidoka WRC and BLM's interim management for this area have been added to EIS Section 3.8 (Land Use and Realty). The Idaho SHPO received a draft TCP report for a proposed Minidoka TCP from Friends of Minidoka, and provided their response on February 20, 2023. The SHPO has concurred with the recommended finding that there is an eligible TCP associated with the site, significant under NRHP Criterion A. However, SHPO's comments indicate that more information would be needed to support significance under Criteria B and D, and that SHPO did not agree with the proposed boundary as defined in the study. A copy of this draft TCP report was separately provided to BLM by Friends of Minidoka on January 3, 2023, and BLM received a copy of the February 20, 2023, SHPO response letter. For reference, the draft EIS was finalized in early December 2022, before Friends of Minidoka's draft TCP report was received. The draft EIS was then released for public comments on January 17, 2023. Subsequently, on December 15, 2023, FOM had prepared and then provided to BLM an addendum to their proposed TCP boundary, which reemphasized a Minidoka TCP boundary proposal encompassing large areas beyond the Minidoka WRC, with which SHPO was in disagreement. Therefore, because there has yet to be a defined TCP boundary, the BLM analyzes impacts to the current historic property boundary (Minidoka NHS) in the final EIS, and in that analysis continues to consider potential impacts to Minidoka WRC and to the setting of the Minidoka NHS as it may extend to the Minidoka WRC and the surrounding area beyond. Section 106 consultation will also include the BLM identifying adequate avoidance, minimization, and mitigation measures for adversely affected historic properties, including Minidoka NHS, pursuant to the PA for the project (see EIS Appendix 8). The PA preparation process, including development of appropriate mitigation measures, is ongoing.
12859-3	Kristen Brengel, Robyn Achilles; Friends of Minidoka	The proposed ACEC also includes Indigenous ancestral sites, essential habitats for threatened and migrating species, public lands grazing and opportunities for outdoor recreation. ACEC Requirements: The proposed ACEC meets BLM requirements for relevance, importance, significance, and need for special management to establish an ACEC. Section 103 of FLPMA defines ACECs as: "…areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards." As defined in BLM Manual 1613, an area needs to meet the criteria for relevance, importance, and need for special management attention. A proposed ACEC meets the "relevance" criterion "if it contains one or more" of several qualities, including "significant historical, cultural, or scenic value … and religious or cultural resources important to Native Americans," "a fish and wildlife resource," "a natural process or system," and/or "natural hazards." A proposed ACEC meets the BLM's "importance" criterion if the "resource is characterized by one or more of the following": • "Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness or cause for concern, especially compared to any similar resource." • "Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change." • "Has been recognized as warranting protection in order to satisfy national priority concerns…" • "Has qualities that warrant highlighting in order to satisfy public or management concerns about safety and public welfare."	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-4	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Finally, a proposed ACEC meets the "special management attention" criterion if it requires "management measures" which are "unique to the area involved and include terms and conditions specifically to protect the important and relevant values occurring in that area." After an ACEC is nominated, FLPMA requires that a BLM interdisciplinary team evaluate it to ensure that the proposed ACEC fits the statutory definition. Resources are evaluated based on several criteria, including, for instance, the degree of degradation already present at the	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		resource. After developing a draft land use plan amendment, BLM sets a 90-day public comment period during which citizens can comment on the proposed ACEC. Public comments are incorporated into the ACEC. After the period of public comment, the ACEC is designated by the State Director via a Resource Management Plan amendment if no protests are submitted. Minidoka Meets the ACEC Criteria: The proposed Greater Minidoka Area of Critical Environmental Concern includes imperiled cultural and natural resources.	
12859-5	Kristen Brengel, Robyn Achilles; Friends of Minidoka	The Viewshed: As noted in the ACEC nomination "[i]t is of fundamental importance to the visitor experience at Minidoka that the viewshed – that is, the landscape that can be viewed, night or day, from the site -- be kept as unsullied as possible."20 The ACEC petition defines the methodology for determining the Minidoka viewshed: "[i]n order to quantify the extent of the viewshed, we conducted an analysis using ArcMap 10.8's Viewshed tool (in the Spatial Analyst extension). ArcMap's Viewshed tool uses a raster elevation surface and inputs "observer" points to determine the area visible from the observer point at a given height above the ground. The state of Idaho's Digital Elevation Model was clipped to an approximately 150 x 120-mile rectangle around Minidoka. The National Historic Site's Visitor Center was chosen as the observation point for the analysis, with an eye height of 2 meters (approximately 6 feet) and a refractivity coefficient of 0.13 (tool default). The tool was also set to account for the earth's curvature."21 The representation below shows the results of this analysis. The viewshed from the Minidoka Visitor's Center extends to the borders of the provided clipped raster and includes the mountains to the north and south and some of the buttes and local high points in the Snake River Plain. The nomination for the ACEC includes a more comprehensive viewshed analysis than the one provided in the DEIS. The ACEC nomination also includes information about Tribal resources and values as well as species protection that complement our ACEC petition. The proposed ACEC is consistent with the recommendations of the BLM's Lava Ridge Subcommittee. Because of the project's significant negative impacts on Minidoka's viewshed and a range of other important public values, the Subcommittee unanimously recommended the no Action alternative (Alternative A).22 The Subcommittee also recommended that "BLM adopt protective measures for the cultural landscape and heritage for wise multiple use … [and] begin a public process to amend the Monument RMP to designate protective measures around Minidoka and other wise multiple uses, subject to valid existing rights."	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-6	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Why the ACEC Designation Supports Previous US Government Actions: Designating the ACEC would align BLM land management with the Monument RMP, FLPMA, the Administration's racial justice policies and statutory and policy authorities to protect nationally-significant historic resources. The ACEC petition builds on our recommendation in the scoping letter that "BLM study measures to permanently protect Minidoka's fundamental resources and values from Lava Ridge and future threats."24 Approval of the ACEC would build on nearly fifty years of official U.S. government acknowledgements that the incarceration was wrong and executive branch policy, dating back to President Gerald Ford's decision to rescind Executive Order 9066 in 1976 and the designation of Minidoka on the National Register of Historic Places in 1979. Pursuant to the National Historic Preservation Act, the U.S. Bureau of Reclamation secured approval to add the former Minidoka Relocation Center to the National Register of Historic Places on July 10, 1979. The ACEC would also meet FLPMA's planning requirements and statutory goals and BLM's goals in the proposed Conservation and Landscape Health regulation. FLPMA Section 202(c)(3) requires BLM to "give priority to the designation of and protection of areas of critical environmental concern" and Section 102(a)(11) states that "regulations and plans for the protection of public land areas of critical environmental concern be promptly developed."27 In its Conservation and Landscape Health draft rule, BLM proposes a change to its Section 1610.7-2 of its regulations to "emphasize the requirement that the BLM give priority to the identification, evaluation, and designation of ACECs during the planning process as required by FLPMA…"28 The proposed regulation states that "[i]n the land use planning process, authorized officers must identify, evaluate, and give priority to areas that have potential for designation and management as ACECs."29 Adoption of the ACEC would also meet FLPMA's requirement to coordinate BLM land use planning with the National Park Service. FLPMA section 202(c)(9) requires BLM "to coordinate the land use inventory, planning, and management activities … with the land use planning and management programs of other Federal departments and agencies."	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-9	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Through an Instruction Memorandum (IM2022-59), dated September 20, 2022, BLM provided guidance to field offices: "[w]orking to achieve environmental justice is a whole-of-government responsibility, requiring Federal agencies to provide fair treatment and meaningful involvement to all. The BLM supports this effort."77 The BLM's "Addressing Environmental Justice in NEPA Documents: Frequently Asked Questions," states that: "[f]air treatment means that no group should bear a disproportionate share of the adverse consequences that could result from federal environmental programs or policies. Populations of particular concern are minority, low-income, and tribal communities." The EPA defines environmental justice "as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The EPA further defines the term fair treatment to mean that 'no group of people should bear a disproportionate burden of environmental harms and risks, including those resulting from the negative environmental consequences of industrial, governmental, and commercial operations or programs and policies'."79 As noted below, BLM's preferred alternatives C and E violate BLM and Administration environmental justice "fair treatment" requirements because of the Alternatives' "disproportionately high and adverse impacts to the Japanese American community and Native American Tribes."80 Adopting the ACEC would avoid disproportionate burdens and ensure fair treatment for our community.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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12859-16	Kristen Brengel, Robyn Achilles; Friends of Minidoka	1.3 Decision to be Made. In light of the petition to designate the ACEC, we respectfully request BLM replace the decision to be made with: • Decide to amend the Monument RMP to designate the Minidoka ACEC as proposed in the petition submitted by the Friends of Minidoka.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). As stated in EIS Section 1.2 (Purpose and Need), the BLM's purpose is to respond to MVE's application for a ROW grant to construct, operate and maintain, and decommission a wind energy facility on public lands in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies. The need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V). The suggested alternative to "amend the Monument RMP to designate the Minidoka ACEC" does not constitute an alternative that would meet the purpose and need for the Proposed Action. Amending the monument RMP and designating the Minidoka ACEC represent federal management actions that are outside the scope of this NEPA analysis.
12859-17	Kristen Brengel, Robyn Achilles; Friends of Minidoka	1.4 Conformance with Land Use Plans. In addition to supporting the ACEC nomination, the TCP means that LS Power's proposed wind project does not conform with the Monument RMP's requirement to protect cultural resources. Because of the cultural significance of the Minidoka TCP, the RMP requires BLM to reject LS Power's proposal. The RMP designates the lands around Minidoka as a Moderate Use Area and directs that "[s]ensitive and significant values will always be protected consistent with Federal and State law."150 The Monument RMP also requires BLM to "manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained or enhanced consistent with State and Federal laws."151 The RMP continues: …Cultural resource values discovered in a proposed work area will be protected by adhering to the following methods: 1. Redesigning or relocating the project. 2. Salvaging, through scientific methods, the cultural resource values pursuant to the SHPO agreement. 3. Should the site be determined to be of significant value; eligible for or on the National Register of Historic Places; and/or the above mentioned methods are not considered adequate, the project will be abandoned.152 The BLM DEIS is based on inadequate information. BLM is aware of the TCP and, based on the SHPO's determination, the Minidoka TCP "may be eligible for the National Register." As required by the RMP, BLM has not indicated in the DEIS that it has forwarded the documentation to the Keeper for a determination of eligibility. Without a determination of ineligibility by the Keeper of the Register, BLM cannot conclude that the proposed action conforms with the RMP. In addition, the DEIS does not include a determination of adequacy relating to redesigning or relocating the project and salvaging the cultural resource values pursuant to the SHPO agreement. Without a finding of adequacy, the project does not conform with the RMP. Also, regarding cultural resources, the RMP states that "any adverse impacts to sites," constitutes a "variation From RMP warranting management concern."	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-23	Kristen Brengel, Robyn Achilles; Friends of Minidoka	3.6.2.1.3 Existing and Future Trends and Actions. The BLM's Existing and Future Trends and Actions section is narrowly written and does not include "reasonably foreseeable trends and actions form the affected environment" relating to the Japanese American community as a dispersed Environmental Justice Community. Racial Justice Executive Order (EO 13985) Compliance – Actions that Uplift. The description of the Japanese Americans as a dispersed Environmental Justice Community is incomplete. We recommend that BLM add a new section in the EIS entitled "Underserved Community." As noted above, through his Day One E.O. 13895, the President directed the federal government "should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." As noted in the FOM Scoping Letter (p. 3) and in comments relating to Statutes, Regulations and Other NEPA Documents, the Japanese American community has been "marginalized" and "adversely affected" by inequality. To carry out E.O. 13985, DOI has deemed the Japanese American community at Minidoka an underserved community through its FY 2022 and FY 2023 budget requests to hire more staff for Minidoka's visitor center to enable the public to better understand the whole story of America. As part of the Administration's commitment to underserved communities, the President's FY 2023 budget proposes a $210,000 base increase to enable Minidoka NHS to hire three additional park staff.	See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-24	Kristen Brengel, Robyn Achilles; Friends of Minidoka	[Deficiencies cited regarding BLM's Existing and Future Trends and Actions relating to the Japanese American community as a dispersed Environmental Justice Community. Examples included in pdf letter] America's Changing Commemorative Landscape (Actions that Uplift). Through Presidential proclamations and direction from Congress through authorizing legislation and annual appropriations bills, the Japanese American and AANHPI Community has worked to make America's commemorative landscape more inclusive to better reflect America's rich and diverse heritage and to tell the whole story. With the exception for possible decisions relating to renewable energy projects at Japanese American sites in the Western U.S., the Japanese American community anticipates that America's commemorative landscape will continue to trend towards greater inclusion and belonging and encourages BLM to factor this into the baseline condition.	Section 3.6.1.1.1 (Existing and Future Trends and Actions) in the environmental justice analysis has been updated to include a description of Minidoka-related commemorative events and educational programs and Japanese American Confinement Sites Grants, and these trends and actions have been carried throughout the cumulative analysis for environmental justice presented in Section 3.6.1.2.
12859-25	Kristen Brengel, Robyn Achilles; Friends of Minidoka	[Deficiencies cited regarding BLM's Existing and Future Trends and Actions relating to the Japanese American community as a dispersed Environmental Justice Community] Commemorative Events (Actions that Uplift) As part of the baseline description of the Japanese American community, there are several events which uplift our community. The DEIS does not adequately incorporate these events in the baseline description and assess the impacts of the wind project on these uplifting events. These events include Day of Remembrance and associated events (February-March) such as: • Puyallup Fairground, WA – events sponsored by the Minidoka Pilgrimage Planning Committee and the Japanese American Citizens League (JACL) at "Camp Harmony" in Washington State. • Idaho -- commemorative events sponsored by the Friends of Minidoka and JACL, including proclamations by the Governor of Idaho. • Bainbridge Island (Eagledale Ferry Dock), WA -- commemorative events to mark the forced relocation of the Bainbridge Island Japanese American community on March 30, 1942	See response to comment 12859-24 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		sponsored by the Bainbridge Island Japanese American Exclusion Memorial Association (BIJEAMA) and the Bainbridge Island Japanese American Community (BIJAC) With the COVID pandemic in decline, Japanese American groups have restarted annual in-person pilgrimages. These events provide immersive experiences, opportunities for healing, sharing stories, and connecting the Japanese American diaspora and multiple generations. Minidoka Pilgrimage Planning Committee is planning to have its annual pilgrimage in 2023.208 Annual pilgrimages are a critical part of the value of Minidoka for our community. According to Joanne Doi, pilgrimages are a "sacred journey" that captures a "sacred story of suffering and spirit"	
12859-26	Kristen Brengel, Robyn Achilles; Friends of Minidoka	[Deficiencies cited regarding BLM's Existing and Future Trends and Actions relating to the Japanese American community as a dispersed Environmental Justice Community] Japanese American Confinement Sites Grants (Actions that Uplift). In annual appropriations bills from FY 2009-2023, Congress has appropriated funds every year for the JACS program for a total of over $43.5 million. To tell the whole story, the NPS awarded $657,000 in grants for the guard tower, honor roll, interpretive material, digitization of resources and other projects at Minidoka. President Biden's FY 2024 budget request includes a request for JACS grants. Investments in Museum Education (Actions that Uplift). This changing commemorative landscape extends to regional and national museums and other institutions that help tell the full story of America. To complement America's changing commemorative landscapes, our nation is making significant investments in museums focused on the Japanese American and AANHPI experiences. In 2021, the Japanese American Museum of Oregon (JAMO) opened its new building Portland with a focus on Oregon's Nikkei community and the World War II incarceration.211 An affiliate of the National Park Service and the Smithsonian, the Wing Luke Museum in Seattle interprets the stories of Washington States AAPI communities including the Japanese American incarceration.212 The Idaho State Museum in Boise has partnered with Minidoka in its educational programming.213 At the national level, museums have helped tell the story. The Japanese American National Museum (JANM) has taken a lead role to document the lives of Japanese Americans, including before, during and after the incarceration. In 2020, Lonnie Bunch, the Secretary of the Smithsonian, announced "Our Shared Future: Reckoning with Our Racial Past."	See response to comment 12859-24 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-28	Kristen Brengel, Robyn Achilles; Friends of Minidoka	[Deficiencies cited regarding BLM's Existing and Future Trends and Actions relating to the Japanese American community as a dispersed Environmental Justice Community] America's Racial Reckoning – Telling the Whole Story (Actions that Uplift). In 2021, the Department of the Interior has led an effort to acknowledge additional painful chapters in our history including the murder of Emmett Till, the trade in enslaved people at the Forks of the Road site in Natchez, the terrible legacy of family separations and social genocide at federal tribal boarding schools. Contemporary Human Rights issues. As noted in the DEIS, Minidoka is a place "to make connections between past injustices … and contemporary human rights issues."218 The NPS's Foundation Document also notes that the site "provides an opportunity for understanding the need to protect civil rights and liberties for all regardless of gender, race, religion, sexual orientation, or national origin."	See response to comment 12859-24 (see in Table A-3h, Environmental Justice and Socioeconomics).
12859-31	Kristen Brengel, Robyn Achilles; Friends of Minidoka	3.6.2.2.3 Alternative C (Reduced Western Corridors) BLM rightfully finds that any alternative would have "disproportionately high and adverse impacts to the Japanese American community…": "Given the importance of environmental setting and feeling to the visitor experience of remoteness, isolation, abandonment, reflection, and healing at these sites, any adverse effects to the baseline soundscape or landscape would have a disproportionately high and adverse effect on the Japanese American community."228 However, the BLM wrongfully states that the "the degree of visual change … would be reduced from major to moderate."229 The visual simulations from KOP 1, KOP 2 and the Honor Roll clearly show major visual changes. In addition, the visual modeling in the Minidoka ACEC nomination shows major visual changes from the multiple locations in the park.230 3.6.2.2.5 Alternative E (Reduced Southern Corridors) BLM rightfully finds that any alternative would have "disproportionately high and adverse impacts to the Japanese American community…": "Given the importance of environmental setting and feeling to the visitor experience of remoteness, isolation, abandonment, reflection, and healing at these sites, any adverse effects to the baseline soundscape or landscape would have a disproportionately high and adverse effect on the Japanese American community."231 However, the BLM wrongfully states that for both Alternatives C and E "the degree of visual change … would be reduced from major to moderate."232 The visual simulations from KOP 1, KOP 2 and the Honor Roll clearly show major visual changes. In addition, the visual modeling in the Minidoka ACEC nomination shows major visual changes from the multiple locations in the park.	The visual analysis in EIS Section 3.16 has been updated to reflect a higher viewer sensitivity rating for the Minidoka WRC, and the discussion of visual impacts for the Minidoka WRC has been updated accordingly in the environmental justice (EIS Section 3.6) and cultural resource (EIS Section 3.5) analyses. Aside from visual effects, other types of effects such as noise, traffic, and dust would be reduced in certain areas with a smaller footprint of alternatives.
12859-38	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Vulnerability model. We recommend that BLM adopt its own methodologies to assess the visual impacts relating to vulnerability and impact pathway. Under BLM's vulnerability model for environmental justice communities: vulnerability = exposure + sensitivity. "Exposure is used here broadly to mean the potential to be affected by environmental change, whether through physical, technological, or socioeconomic factors. Sensitivity refers to any factor that may increase or decrease the magnitude of impact…To be vulnerable to a change a population must be sensitive to it and exposed to it."250 Alternatively, BLM could consider its impact pathway methodology, which "involves the chain of factors by which an environmental change could have(human) consequences."251 The impact action model considers action, population, exposure, sensitivity and impact.252 Under both methodologies, BLM should consider the emotional sensitivity of the Japanese American community and the impact of the U.S. Government's betrayal on the community. Minidoka is about survivors living with a sense of shame for decades afterward and going to their graves thinking that they were "the enemy." It is about the Japanese American diaspora – families scattered across the country and never returning to their homes on the West Coast. It is a place to heal multi-generational trauma that has flowed through our community for decades. It	The visual analysis in EIS Section 3.16 (Visual Resources) has been updated to reflect a higher viewer sensitivity rating for the Minidoka WRC, and the discussion of visual impacts for the Minidoka WRC has been updated accordingly in the environmental justice (EIS Section 3.6) and cultural resource (EIS Section 3.5 [Cultural Resources]) analyses. Potential psychological effects to the Minidoka community are considered and analyzed in Section 3.6.1 (Environmental Justice Communities).

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		is about acknowledging a wrong and helping us heal. Siting wind turbines against the backdrop of the Military Honor Roll is a profound sign of disrespect to the memories of Japanese American veterans and their courage and sacrifice for a nation that imprisoned their families.	
12865-4	Regina Smith	Volume two, page 2 line 10 “provide economic benefits to the state of Idaho and the local communities of Jerome, Lincoln, Minidoka, including the creation of new jobs” Back to volume one, page 3–190, the third bullet states, “the entire workforce needed for the project construction and operation will be non-local workers .” This appears to be the only benefit they have cited. Concerned citizens see no benefits to Idaho or Jerome, Lincoln, Minidoka, Cassia, Gooding, Twin Falls, Washington Counties.	See response to comment 11873-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
12908-2	Diana Jones	The crops we grow, require cool nights and warm days. Wind turbines warm the ground air during the night and cools ground air during the day. What will this do for us and other farmers?	See response to comment 9919-2 (see in Table A-3o, Land Use and Realty, including Aviation).
12969-1	Karen Brockway	The Lava Ridge Wind Project draft EIS has omitted attention to a major drawback of the project, which is the overall cost vs. benefit analysis. The land consumption required for the wind project has an entirely negative impact on all the acreage involved, physically, visually, economically, and environmentally, while providing extremely little exchange for increased benefits for humans and wildlife. ... The exchange of cost vs. benefit makes this project an irrational use of public lands with minimal positive impact for Idahoans. The proposed alternative locations for the wind project will have all the same cost vs. benefit shortcomings and should be opposed based on the simple equation of consumption of land vs. general resulting benefits. Large scale wind farms are a poor use of the vast public land consumption they require.	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
13000-3	Nathan Small	While the Tribes are identified as one of the environmental justice populations in the DEIS, there is a lack of local demographic information for our Tribal populations where the majority of our members physically reside in SE Idaho.	EIS Section 3.6.1 (Environmental Justice Communities) has been revised to include a more detailed description of the non-dispersed minority populations that occur in the analysis area, including but not limited to Native American populations.
13000-5	Nathan Small	The analysis of impacts to socioeconomic conditions fails to mention or evaluate the loss of subsistence hunting and gathering; as well as a robust analysis of lost income or jobs for locals following the temporary construction of the project.	Potential effects to subsistence uses are analyzed within the context of cultural resources (Section 3.5) and environmental justice (Section 3.6.1). Also see responses to comments 11869-11, 1042-32, and 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
13000-8	Nathan Small	The Project and the DEIS does not conclusively show a net-gain in land value or demonstrate the project will be a long-term asset to the local communities, minorities, citizens of Idaho, or Tribes.	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
13006-6	Leon Smith	6) Recommend the Environmental Justice section should include more detail relating to Tribal treaty rights, historic resources, and emotional impacts to Japanese Americans and Alaskan natives. Social and economic data from counties where tribes reside should be included as well.	See responses to comments 13000-3, 11315-2, and 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
13006-35	Leon Smith	11) Recommend No Action Alternative A due to impacts to private property values. If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has agreements in place with private landowners to compensate for potential property value loss.	As stated in Section 3.6.4 (Residential Property Values), the likelihood or degree to which property values may or may not be affected cannot be predicted with any certainty. The BLM cannot require compensatory mitigation for impacts that are not proven as likely to occur or may occur, but are not likely to be significant based on review of the best available data. As stated in Section 3.6.4, additional project-specific mitigation measures that the BLM could apply to Alternative B would further reduce the potential for turbines to visually impact surrounding residences, which in turn would reduce the likelihood or degree of influence that turbine visibility could have on property values.
13025-1	Ruth Dimond	We are very much aware of the amount of concrete it took to put up the windmills on Bell Rapids. It was difficult for construction companies to get concrete for their projects at that time. The Lava Ridge Project is massive in comparison. Even now there is a shortage of concrete. A project like Lava Ridge would be devastating to all businesses in this area that are dependent on concrete for their livelihood. This would impact Construction Companies, Lumber Companies, Hardware Companies, Electricians, Plumbers, Dairymen, the list goes on. Building would stop without concrete. We are asking you to reconsider the Environmental Impact for the sake of all of this area.	See response to comment 2100-4 (see in Table A-3h, Environmental Justice and Socioeconomics).
1578-2	The Coalition to Protect America’s National Parks	the DEIS fails to consider recent proposals that the project area be considered a Traditional Cultural Property (TCP) and an Area of Critical Environmental Concern (ACEC), which further complicates the comment process.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
1689-8	Tammy Larson	The temporary jobs will create an increase in population that will make it harder to get jobs, and will put a strain on our economy. Then once the project is complete all those workers will disappear to the next job once again hurting our economy.	As stated in EIS Section 3.6.2 (Community Services, Employment, and Housing Availability), qualified workers are likely to come from areas outside the analysis area because of the specific specialized skills and trades required and the relatively remote project location. Because of the need for a relatively specialized construction workforce and to provide a conservative assessment of employment and related impacts, the EIS analysis assumed all workers would be non-local. Although MVE would hire as many local workers as possible, the number of local workers having the necessary qualifications and specialized skillsets is expected to be low. Therefore, the project is not expected to put a strain on local workforce numbers since most, if not all, construction workers would be non-local residents.
1691-1	Regina Smith	During the time this EIS has been in progress, the rapid influx of people has already changed some effects. We need more time to review and see if they are adequately covered. So far we have found no benefit for the residents of Idaho.	Section 3.6.2 (Community Services, Employment, and Housing) has been updated to include more recent census data and other references wherever possible.

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19-2	Joan Trabucco	Wind and solar require "backup generators" to provide electricity when the weather doesn't cooperate to make sure the lights don't go out. Having wind, solar, and backup generators means we have to pay for three types of power plants, wind, solar, or natural gas, and this increases the cost of electricity. Because these costs are only incurred because wind and solar are not reliable.	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The cost effectiveness of renewable energy is not a factor to be considered in the BLM's decision to be made and is outside the scope of this NEPA analysis.
2100-4	Office of Governor Brad Little, Office of Lieutenant Governor Scott Bedke, Office of US Senator Mike Crapo, Office of US Senator Jim Risch, Office of Congressman Mike Simpson	We are concerned about the impact to existing electricity customers and the integrated resource plans of Idaho utilities. The ancillary impacts are also concerning to local Idahoans. As supply chain issues continue to impact commerce in Idaho, we are concerned this project will monopolize valuable and limited resources. Specifically, we are concerned about the consequences to water supply, production and supply of concrete, project materials, as well as the labor market which already pose challenges to businesses across Idaho.	Project-related effects on groundwater quantity are analyzed in EIS Section 3.17.1 (Groundwater Quantity), which compares project-related water withdrawals with existing aquifer volumes. Other construction materials, such as concrete, cement, or gravel, do not have to be sourced locally and would be sourced from outside of the local area, as needed. As stated in Section 2.8 (Gravel, Aggregate, and Concrete) of MVE (2023), aggregate generated on-site from grading and excavation may be used to create road base or concrete materials; however, if the on-site aggregate is not deemed suitable for these uses than alternative commercial sources would be used. The project is not expected to put a strain on local workforce numbers since most, if not all, construction workers would be non-local residents.
2864-1	J.A. Williams	Little information is given regarding the depletion of materials to construct the project as well, which is a concern to citizens and may likely have a substantial impact to industries & individuals in the area	See response to comment 2100-4 (see in Table A-3h, Environmental Justice and Socioeconomics).
2883-2	Gary Cox	the amount of concrete required to build the anchor and the platform for each tower will consume virtually all the available concrete during the construction phase. The scarcity or unavailability of concrete will literally evaporate many jobs and businesses in the local area. This will affect building contractors, lumber and other material suppliers, office and administrative support, banks and credit unions and the list goes on. Hundreds of jobs will be lost with additional impact upon food, clothing, and other vendors. All this potential economic depression in trade for 15 new hires	See response to comment 2100-4 (see in Table A-3h, Environmental Justice and Socioeconomics).
2920-4	Regina Smith	•Increase to population and associated demands on community services during construction and operation. As near as I can determine the only community services analyzed are schools and law-enforcement. There is no discussion of additional use or funding needed to maintain and provide water, water treatment, sewage, dumps, utilities, ambulances and fire staff. These small communities are hard put to deal with the current needs and may not be equipped to handle additional rapid increases. Additional personnel may be needed for school staff, law-enforcement and other first responders. Many rural communities are staffed with volunteers such as fire departments and ambulance drivers. The EIS does commit to cleaning up trash, carcasses etc. for disposal. Where? Where will solid waste be disposed? Hazardous waste? These issues are not addressed completely. •Change in housing availability during construction and operation. During the time this EIS has been in progress, the current rapid influx of people may have filled the "available housing". Table 3.6-4 and Table 3. 6-5 During the same time. Population increases have already pushed rental and purchase prices well beyond what the local residents can afford. Low income and minority populations, college students, young families and elderly cannot afford prices in the current market. Bringing in additional hundreds of workers will increase competition and could cause prices to continue to rise.	Potential effects of the project on water resources are discussed in Section 3.17.1 (Groundwater Quantity). AIB-45 through AIB-46 (EIS Appendix 3) discuss how hazardous and solid waste generated by the project would be managed. AIB-11 (EIS Appendix 3) discusses how the project would affect emergency responders. EIS Appendix 4 (Mitigation) also includes several applicant-committed measures related to the management of the trash and waste, water, animal carcasses, fire safety, and more. Also see response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
2920-5	Regina Smith	In the air emissions section the emissions are projected from the workers driving from Twin Falls. (Top of page 3-12). If the employees are expected to live in the three rural towns the emissions would be lower. But there is no analysis for employees living in Twin Falls. The same impacts on community services can be expected if indeed the employees prefer to live in Twin Falls. Table 3. 6-5	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
3032-2	Robert Johnson	Where in this EIS does it show the impact in material costs for the building industry for new housing, from the amount of gravel, and concrete alone it will not only create a lack of materials but also cause an even bigger problem with cost and availability for contractors in the local areas,I for one have already been affected bye these problems	The construction of new housing is not part of the Proposed Action. See response to comment 2100-4 (see in Table A-3h, Environmental Justice and Socioeconomics).
3063-1	Chris Hopper	Does this project establish a positive cost-benefit over its projected life? Weigh the lost opportunity cost of the existing conditions vs. net energy benefit overall the project life. Don't include government subsidies in this analysis; they don't affect the existing condition or project benefit, they only benefit the developers	See response to comment 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
3477-1	Rebecca Loomis	Permitting this company to use Idaho lands to erect wind turbines to provide other states with power is not justified. Why are they not going to the states who need the power? Other states have not directed power companies to invest in their transformers and power grids. Instead the power companies have invested in "renewable energy" projects that are not reliable or self sustaining. The wind turbines require electric energy to start the turbines and if there is no wind then there is not any energy developed.	See responses to comments 11963-3 and 19-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
3481-1	Jeff Holloway	I am opposed to the Lava Ridge project. No one ever accounts for the year after year, after year, bird kills. Another thing I could not find in the data – Am I subsidizing this private venture through increased electricity rates?	EIS Section 3.3 (Avian and Bat Species) provides fatality estimates for bats and avian species during project operation. Also see response to comment 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
3542-2	Sue Page	And the question still not answered is why is this being allowed? Why is a company from another state strolling onto our land to pillage for the sake of a different state. Is all this energy necessary? Why does it have to come from Idaho to be transmitted down to California? Why can't locations closer to the end user be considered? There is a lot of land along Hwy 80 between Wells and Reno. The same for Jackpot. There is plenty of land in California open and ready for uses. Imperial Sand Dunes, Indio, Eagle Mountain, Palm	See responses to comments 11963-3 and 19-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		Springs, Bakersfield. All these open spaces should be considered over our land in Idaho. Why not have home grown power? Because it's not good for their state?	
4018-1	Dave Jakovac	Moreover, who in Idaho will benefit from this proposal? We have only 3 power providers in Idaho and they would be obligated to purchase this power by law. Since the cost of wind mill power has been estimated between 16 - 24 dollars per kilowatt hour, it will cost Idaho residents nearly 2-3 times more that the existing user rate. IDAHO Power would be obligated to pay for use of this power to its grid based on replacement cost, which will cost substantially more. Innocent consumers in Idaho would not materially benefit from the power due to increased cost. I understand that the end user targeted is regional, not for Idahoans based the proposed 100,000 MW facility.	See responses to comments 11963-3 and 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
5189-6	Traci Wood	What about the 700 man crew coming to build said wind farm, where will they be housed? We already have a housing shortage as it is. Our own citizens in our communities can't find houses to rent. I don't agree with the thought someone mentioned on opening R.V. Parks. That takes time, money, permits etc. Not feasible, and to what end when the crew leaves.	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
5896-9	Mike Tylka	Personnel. The types of jobs that building these towers requires is somewhat specialized occupations that are transitory in nature. While there may be some local people hired, for the most part, there are not enough facilities available in the immediate area to house personnel. Camping space is even more limited and we do not need a desert full of "boondockers" despoiling public land. The tradeoff for the few permanent jobs is not worth the risk. The socio-economic aspect would probably increase the likelihood of an additional criminal element in the area tasking local law enforcement personnel.	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
5920-7	Kelly Varelmann	Many local sub-contractors will be hired during the construction process which is the only positive point that I have about this project. This economic effect will be short lived, though. How many long-term jobs will this project actually produce? As I see it, the BLM is willing to undermine Idaho's environmental integrity in order to provide electrical power to California who can then claim their power as "green".	As stated in EIS Section 3.6.2 (Community Services, Employment, and Housing Availability), project operation is estimated to last 30 years, with approximately 20 to 75 workers employed throughout operation (see Section 3.6.2.1.3).
6075-2	Lorinda Grant; Douglas Grant	We are concerned with the property values of this land if the proposed wind farm is approved, if the values are affected by the wind farm then is MVE going to compensate for the value drop. The vicinity of the wind farm would make our farm ground near impossible to sell. We have lived and farmed this property for years and it is our retirement in the future.	See response to comment 11535-56 (see in Table A-3h, Environmental Justice and Socioeconomics).
6100-1	Bill DeBruin; Vickie DeBruin	First Environmental Justice Communities from page 24 of the EIS you state that the impacts greatest for the environmental justice population are closest to the sitting corridor, and along the haul routes, there are several scattered rural residences within 0-2 miles. This implies that since there's not a large population, or the income level might be below average that consideration of these individuals should be minor or ignored. I would call this discrimination. Everyone is affected by this project regardless of how or where they are living, or what line of work they are engaged in or the population.	The EIS analysis presented in Section 3.6.1 (Environmental Justice Communities) analyzes the potential effects of the project on low-income and minority populations, and the analysis is in compliance with EO 12898 and the BLM's environmental justice guidance document (IM 2022-059). This analysis is solely focused on evaluating impacts to low-income and minority environmental justice populations, including populations closest to the siting corridors, and nowhere in the analysis is it suggested or implied that effects to any individuals within environmental justice populations should be ignored as the commenter is suggesting.
6340-1	Cat Jobes	When I heard that BLM portrayed the Minidoka ancestors "Tourists" I was shocked, saddened and not surprised. They call it "white washing" for a reason. Please issue an apology and rewrite the 3.6-3 Environmental Justice Observation Points.	The EIS has been revised to correctly represent the Japanese American community and Japanese or Alaska Natives. The BLM apologizes for indicating in any manner that the Japanese American community and Native Americans are within the sensitive viewer group of "tourists and recreationists," and the EIS is revised to not indicate or imply this. Because of the sensitive character of resources or landscape features assessed from certain KOPs, and their strong connections to these, the BLM understands and respects that the Japanese American community and Native Americans should not be referred to as "tourists" in any manner in relation. For consistency with the Minidoka NHS foundation document (NPS 2016), the terms "visitors and survivors" were used to characterize Japanese American community members within the Environmental Justice and Cultural Resource sections of the draft EIS (EIS Sections 3.5 and 3.6). In EIS revisions, the group formerly referred to under Visual Resources (EIS Section 3.16) as "tourists and recreationists" has been replaced with "visitors," and the Environmental Justice and Cultural Resource sections of the EIS have been revised to also refer to Minidoka-connected communities as "pilgrims" or "incarcerees and their descendants" where appropriate. In the Environmental Justice section of the EIS, the dispersed environmental justice community formerly called the "Japanese American Community" has been broadened to "Japanese American and Minidoka-Connected Communities" to reflect a greater diversity of communities having ties to Minidoka. The commenter was correct that visual resource management categorizations included categories that did not fully reflect the connection of the Japanese American community to Minidoka NHS and surrounding area and caused offense, no matter how inadvertent. For this reason, the EIS has not solely relied on these categorizations but also considers the unique sensitivities of the Japanese American community, as the commentor has noted. Within the issues analyzed, the sensitivities, perceptions, and concerns of the Japanese American community are therefore specifically addressed in the Visual Resources, Cultural Resources, and Environmental Justice sections of the EIS.
6866-5	David Briggs	Renewable energy hits poor people the hardest as they see their energy bills go up by order(s) of magnitude.	See response to comment 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics).
6871-2	Name Not Provided	The property values of the farm ground in these areas would be negatively affected if the methods of application are limited. Crop quality would suffer if farmers instead are required to dry out the crop enough to drive a ground applicator through the field. Alternatively some products may be applied through irrigation water referred to as chemigation. Chemigation requires the farmer to have an license and careful calibration and monitoring is required for effective application. Many farms in the area depend on GPS systems for the operation of several machines on their farms. Many of	See response to comment 11535-56 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		these systems depend on a radio signal from a base station for real time kinematics (RTK) correction. Some of these base stations are located within or nearby the project area. Farmers depend on these systems for sub inch accurate placement of their machines to avoid crop damage and maximize efficiency. Signal interference or interruptions during the construction and operation phases may occur. These would be problematic for farmers resulting in crop damage or decreased productivity.	
7320-7	Lora Ohlensehlen	I am greatly offended that the EIS study does not honor the ranching families in the impact area. I read on a poster, "Environmental Justice Communities mandates consideration of environmental justice (EJ) issues, the fair treatment of all potentially affected people, regardless of race, color, national origin, or income." Why are the ranchers of the Star Lake Grazing Association not being held to this degree of respect? These ranchers are contributing members of society. They have been community leaders. Their incomes help support many other local businesses. For years, even generations, they have been good stewards of the land. They have put in water systems for their animals, that also benefit wild life in the area. The grazing animals help lower wild fires. The ranchers cooperate in rotating their animals in allotments to sustain feed for both domestic and wild animals in the area. Now an outside corporation is wanting to use this land, and now the ranchers will suffer consequences. This makes no sense!	The EIS analysis presented in Section 3.6.1 (Environmental Justice Communities) analyzes the potential effects of the project on low-income and minority populations who reside within the tri-county analysis area. Therefore, the local residents and communities mentioned by the commenter have been considered within the context of the environmental justice analysis. In addition, other socioeconomic issues within Section 3.6 of the EIS analyzed potential effects of the project on the local economy, community services and housing, and property values for local residents within the tri-county analysis area (plus the cities of Twin Falls and Burley). Section 3.9.1 of the EIS analyzed potential effects of the project on the and grazing economy/culture. Therefore, potential project related effects on all local residents, regardless of income or race, have also been analyzed in the EIS within the context of various resource issues.
7344-1	Matt F.	Please accept my comment regarding the Lava Ridge Wind Project EIS as it relates to the negative economic impacts to ratepayers caused by the project. It is well known that the unreliable nature of wind and solar makes the electricity they produce very expensive, despite the claims of their proponents. It is also known that BLM is required to include the socioeconomic impact of these projects on surrounding communities in their EISs. What is unknown is a bit of a gray area: what is the economic impact on electricity ratepayers? Is BLM-required to analyze this in their EISs? Jurisdictions which have heavy reliance on wind and solar also have very high energy prices. The state of California is one example (source citation links within): https://www.forbes.com/sites/michaelshellenberger/2018/04/23/if-solar-and-wind-are-so-cheap-why-are-they-making-electricity-more-expensive/ The phenomenon of drastic rate increases seems to follow wind and solar wherever they are deployed (source citation links within these articles): https://www.forbes.com/sites/michaelshellenberger/2018/04/25/yes-solar-and-wind-really-do-increase-electricity-prices-and-for-inherently-physical-reasons/ https://spectrum.ieee.org/electricity-its-wonderfully-affordable-but-its-no-longer-getting-any-cheaper Despite the claims that wind and solar can power a large and modern industrialized society, California's experience proves otherwise. After spending two decades investing heavily in wind and solar, the state still had to import a quarter of its energy in 2019: https://www.eia.gov/todayinenergy/detail.php?id=46156 In 2021, California had to seek permission from the federal government to burn more fossil fuels, because their wind and solar dependent grid could not provide for the residents of the state: https://www.bloomberg.com/news/articles/2021-09-09/california-seeks-to-avert-blackouts-by-burning-more-fossil-fuels If wind and solar worked, then why did the above scenarios happen? The answer is simple: wind and solar don't, can't, and won't ever work for inherently physical reasons. They are intermittent, while the demands of the electricity users are constant. It's a fundamental design incompatibility. Which leads to the economic aspect: if we know that inundating the electrical grid with intermittent, highly volatile power sources leads to more expensive power bills, how can this be reconciled with the need to not negatively financially impact various neighborhoods and communities? How exactly does subjecting an entire state to electricity price spikes, brownouts and blackouts like California has experienced, benefit the state? How does causing manufacturers to flee the state due to unreliable power help us, particularly those of lower and middle incomes who work at such manufacturing facilities?	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. Whether and to what extent the Proposed Action would influence the cost of energy for consumers is not a factor to be considered in the BLM's decision to be made and is outside the scope of this NEPA analysis. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. In accordance with CEQ's NEPA regulations, the BLM analyzed the potential effects of the Proposed Action and alternatives on several different resource topics identified through internal and external scoping including but not limited to natural resources, cultural and historic sources, and socioeconomics. With respect to the economy, the BLM analyzed the potential economic effects of the project in Section 3.6 (Environmental Justice and Socioeconomics). The BLM will make a reasoned choice among the alternatives based on the EIS analysis for all resources, and the BLM cannot determine significance for a proposed action based on economic effects alone.
7744-1	Joan Hurlock	The Lava Ridge project construction is estimated to take 2 years, with approximately 400 to 850 workers on-site during construction, likely to come from areas outside the analysis area due to the specific specialized skills and trades required. One area of concern regarding the Lava Ridge Wind Project is the availability of sufficient housing units to accommodate this number of workers. According to Table 3.6-4. Employment and Housing Characteristics in the Analysis Area, there are 1,737 vacant Housing Units available in the tri-county area (Minidoka, Lincoln, Jerome). This data is taken from the U.S. Census Bureau (2021) and Google Maps (2021). A Housing Unit is defined as "a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters". I dispute the validity of the data provided in the DEIS. In the last 2-3 years, the Magic Valley has had an influx of people who moved here from other states and a rise in investors who purchased inexpensive rental properties. As a result of this increased demand, the supply dramatically decreased. The rise in the cost of housing, both to purchase and to rent, has led to a severe, affordable housing shortage. Low-income and fixed-income residents can no longer afford to pay the higher rents. Many of these people now live in their vehicles or weekly motel units. After consulting with professional real estate brokers and agents, the listed number of 1,737 housing units available is demonstrably false. One broker laughed when I asked if that many units were vacant, and he said "not even close". I was told that the 5.1% vacancy rate listed in Table 3.6-4, is closer to 1%. The three largest apartment complexes in the area currently have available 3, 8, and 3 units, respectively. An internet search for rentals available in the area netted dozens – not hundreds of rentals: Zillow.com: (6) Burley, (1) Jerome, (0) Lincoln county Homefinder.com: (1) Burley, 3) Twin Falls, (2) Wendell, (1) Jerome Apartmenthomeliving.com: (36)Minidoka County, (8) Lincoln County, (19) Lincoln County Craigslist.com, listings as of March 20, 2023: (26) Twin Falls, (2) Burley, (2) Jerome Western MV Realtors: (16) Twin Falls, (1) Jerome, (1) Heyburn, (1) Hansen I learned from personnel at the Office of Emergency Management that the Magic Valley is experiencing a homelessness crisis, brought on by the increased cost of renting; there are literally no affordable units available for low-income and fixed-income individuals; the long-term	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).

Comment ID	Commenter	Public Comment	Response to Comment
		stay motels are at capacity. Hundreds of additional workers will further exacerbate the homelessness issue. One can observe small vacant acreages throughout the Magic Valley where 3 to 10 motor homes, campers, and trailers are dry camping. The presence of children's toys at these sites indicates the homelessness issue is affecting children. And there are reports of single moms and their kids living in RV's on property belonging to relatives because they cannot afford the housing that is available. There are several RV parks in the area. I have listed the number of spaces at each park, but they aren't necessarily vacant: Heyburn Riverside RV: 29 full service hookups Country RV Village: 30 sites Lake Walcott State Park: 22 serviced spaces, 18 standard Shoshone RV Park: 41 full service hookups West Magic Resort: 30 RV hookups Big Trees Mobile Park: 25 full hookups As an alternative to rentals, will man camps be situated on the project site or other bare land? Man camps tend to be primarily occupied by men, without their families. With that comes an increase in crime, drugs, and litter. Due to the severe housing shortage, the Magic Valley cannot absorb 400 to 850 additional residents.	
8624-2	Public Comments via Remote Video	It was stated earlier that the property values would decrease, and, thus, that would decrease the amount of tax revenue that's being collected. Would this mean that the tax entities that rely on the tax revenue would have to have their budgets decreased; schools, roads, emergency services, etcetera?	As stated in Section 3.6.4 (Residential Property Values), the likelihood or degree to which property values may or may not be affected cannot be predicted with any certainty. Therefore, the indirect effects of altered property values on property taxes are equally uncertain and difficult to predict. However, the amount of additional local and state taxes that would be generated by project construction and operation are disclosed and analyzed in Section 3.6.3 (Local and Regional Economy).
8624-6	Public Comments via Remote Video	I brought up this area of critical environmental concern nomination. Under the code of federal regulation, the BLM can write a supplemental environmental impact statement based on new information. Because that is new information, you could actually please a lot of the people who are opposing this by creating a new alternative, and that would require a plan amendment, which we've all been asking you to do, and then we could work out some of these issues with visual resources.	See responses to comments 12859-2, 12859-16, and 11672-3 (see in Table A-3h, Environmental Justice and Socioeconomics).
8624-8	Public Comments via Remote Video	I see -- I hear a lot about the environmental justice. And it's talked about, you know, the Japanese Americans and how they were treated poorly and denied their privileges and rights, civil rights, for being citizens of the United States, and I hear a lot about the Native-American tribes and how their rights will also be decreased by Lava Ridge Project, but there's not even consideration about the local population that live in Hidden Valley, the Star Lake areas, the small towns of Dietrich and Shoshone, the people that live on Red Bridge Road and by the substation. The poor people in Hidden Valley will be surrounded by these wind turbines. They'll be in their own prison with wind turbines that they will see that will block every sunset and every full moon and sunrise. They're going to have their property values decreased. And that's in 3.6.6, as Jamie quoted. People within that two to ten miles are having their private landownership rights being violated, and I believe there needs to be some sort -- for them, the only mitigation that's possible is to choose Option A, no action. Anyways, there's some things you just can't mitigate. You either have it or you don't. There's some things that cannot be replaced. And your home is your castle. And in America -- in the United States, you're supposed to have equal rights. And I don't see the local people having equal rights.	The EIS analysis presented in Section 3.6.1 (Environmental Justice Communities) analyzes the potential effects of the project on low-income and minority populations who reside within the tri-county analysis area. Therefore, the local residents and communities mentioned by the commenter have been considered within the context of the environmental justice analysis. In addition, other socioeconomic issues within Section 3.6 analyzed potential effects of the project on the local economy, community services and housing, property values for local residents within the tri-county analysis area (plus the cities of Twin Falls and Burley). Section 3.9.1 of the EIS analyzed potential effects of the project on the and grazing economy/culture. Therefore, potential project related effects on local residents have been analyzed in the EIS within the context of various resource issues.
8632-2	Charles Van Vooren	I wonder if these wind generators will produce some sort of electrical pollution. This needs to be addressed. I know about the power lines because I read about it; if it effects livestock, what about people? You are not allowed to build under power lines. How many of these lines will be crossing or bordering private property? I would be willing to bet property values will decrease. Will your property taxes decrease also?	AIB-12 in EIS Appendix 3 (Issues Analyzed in Brief) analyzes potential effects of EMFs and corona exposures to workers and the public. As stated in Section 3.9.2 (Physiological Effects to Livestock), electric and magnetic fields have not been shown to have harmful impacts to livestock. Potential effects to property values are analyzed in Section 3.6.4 (Residential Property Values). Because the magnitude of effects to property values are uncertain, the indirect effects of altered property values on property taxes cannot be determined.
8639-1	Mark Southwick	The possibility of 700 or more workers with their families moving into the area during a two (2) year construction period is a concerning and a difficult impact to deal with. It is presented as a financial plus to the area, however preparing for and dealing with the stated influx is difficult at best. Consideration to the social, economic and infrastructure changes required during the construction period would likely have lingering effects after those workers, families and construction assets leave the area, leaving it to the Dietrich Hidden Valley Community to fund and deal with.	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).
8642-5	Carl Montgomery	The final area of concern for Jerome County Farm Bureau is who benefits from the energy produced and the amount of revenue received versus the costs incurred. It is obvious the local people will not benefit directly from the energy produced. It is will be sold to others throughout the West, mainly to those in California. Thus, they are the mass beneficiaries while those of Jerome, Lincoln, and Minidoka counties carry not only the direct costs, but also as the indirect costs. Magic Valley Energy has data on the economic impact of the project. During the construction period the tax revenue is estimated at over $80 million, and $4 million on an annual basis after construction. This is a substantial amount to income at first glance. However, there are numerous organizations to which the funds would go. This would include everything from school and highway districts to emergency services. Once $4 million is allocated as mentioned, the funds will be depleted rapidly with minimal value. As an example, there will be increased costs to replace, repair, and maintain roads, of which the highway districts will not receive enough in tax revenue from the project to make up the difference.	See responses to comments 11963-3 and 1042-31 (see in Table A-3h, Environmental Justice and Socioeconomics).
8790-4	James Ritchie	3. MVE claims the area will have an economic boom during the construction phase of the project. Where will these people find housing? What will happen to our highway districts, police departments, fire districts and school districts? Increased demand for services will as always have the cost paid for by local property taxes. When all is said and done the locals will be left to pick up the pieces.	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).

Comment ID	Commenter	Public Comment	Response to Comment
F2-4		These roads, trails and recreation areas are crucial for the local economy for communities that rely on access to these public lands. The U.S. Bureau of Economic Analysis showed that in 2021 the outdoor recreation industry brought in over $800 billion nationwide. By limiting access to this land or decommissioning trails the BLM could be harming the local economy and robbing them of potential income.	See response to comment 11620-10 (see in Table A-3h, Environmental Justice and Socioeconomics).
F2-5		BLM needs to adequately comply with NEPA and fully analyze how the implementation of this proposed wind farm would affect economies. Not only will this ha283rm economic value but also hunting and fishing on this land which is very popular in this area.	See response to comment 11620-10 (see in Table A-3h, Environmental Justice and Socioeconomics).

Fire and Fuels Management

Table A-3i. Fire and Fuels Management

Comment ID	Commenter	Public Comment	Response to Comment
1042-30	WildLands Defense	Public comment expressed concern about ability to respond to brushfires amid the presence of wind turbines. Magic Valley Energy says it'll stop the turbine blades from spinning to allow aircraft … [Turbine accidents frequently CAUSE fires. There is also a serious concern that harmful materials in turbines may be released if the turbines/turbine apparatus burns]. firefighting assets are allowed to fly in that area. The draft EIS states, "FAA regulations do not limit the proximity of aircraft to tall structures for fire suppression and engagement is at the pilot's discretion." The draft EIS said that the turbine corridors would result in fragmentation of fuels, which might aid in suppression of wildfires. [This is grasping at straws].	Regarding wildfire, the BLM has included a discussion of the limited ability of roads to function as fuel breaks in Section 3.7.1.2 (Fire and Fuels Management, Impacts). In the same section, the BLM has also included discussions on fire and ignition risks associated with the wind turbines as well as how the project would reduce aerial wildfire suppression efficiency. Fire risk associated with normal wind turbine operations is discussed in section 3.7.1.2.2 sub header "Ignition". Applicant-committed measures 66–77 and 82 (see EIS Appendix 4) would ensure that flammable hazardous materials and waste are handled and disposed of in a safe and proper manner, reducing the in-situ wildfire hazard potential during construction and operation. See also Section F-6 in the Health and Safety Plan (Appendix F in MVE [2023]).
1049-1	John Cauhorn	With the addition of all the miles of roads, no matter which Alternative, the potential for fire will obviously be greatly increased due to more traffic. The BLM knows as well as anyone, when a fire starts out there and the wind is blowing 20 mph the best chance to contain it is with aircraft. With 400 windmills in the area, air suppression will be more difficult. Fire will easily jump roads with the right amount of wind.	Text has been added within Section 3.7.1.2 (Fire and Fuels Management, Impacts) to discuss increased ignition risk due to the project, decreased aerial suppression efficiency, and wildfire spread potential due to strong winds.
11217-1	Heather Lauer	Also, wind turbine fires are not an uncommon occurrence, and one small spark could be a disaster for thousands of acres of highly flammable desert where the project would be located.	See response to comment 1049-1 (see in Table A-3i, Fire and Fuels Management).
11297-7	Steven Upton, Linda Upton	What about aerial fire suppression and crop dusting capabilities?	See responses to comments 1049-1 (see in Table A-3i, Fire and Fuels Management) and 10512-4 (see in Table A-3o, Land Use and Realty, including Aviation).
11326-10	Filip Camacho, Tasha Sorensen	This region is prone to wildfires, and they move fast. Any hinderance to wildfire suppression and management is a non-starter. As of April 2023, 100% of Jerome County, ID is experiencing abnormally dry conditions and 94% of Lincoln County respectively.8 The deployment of fire suppression aircraft in an area obstructed by windmills, as well as changes to flight patterns is a concern and needs to be addressed. With any surface disturbance, the spread of invasive plant species can be aggressive. Cheatgrass is fueling wildfires in this area and is a menace.9 At one point at the peak of summer last year, we were surrounded by five different grassland wildfires all running at a rapid rate. Without aerial suppression there may have been increased loss of structures as well as loss of life.	See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management).
11396-3	Gina Jerke	The desert is always at risk for fire during the summer which brings the point of how to fight those fires during construction and after completion. Logically air support is off the table and ground support would be hindered as well with the proposed temporary fencing and building of roads.	See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management).
11491-30	Dean Dimond, Jennie Bateman	4. no wildland fire prevention with plan for emergency shutdown of wind turbines, 5. No provision for access in prescribed burning for sagebrush as required treatment for habitat greater prairie sage leks and sagebrush communities	A Fire Protection and Prevention Plan is included as Section F-6 in the Health and Safety Plan (Appendix F in MVE [2023]). Refer to EIS Section 3.7.2 (Fire Reduction and Habitat Restoration Projects) for a detailed discussion of effects to fuels management and habitat restoration projects. See also EIS Section 3.3.4 (Greater Sage-Grouse) and EIS Section 3.15.1 (Native Upland Vegetation Communities).
11527-5	Richard Stover; State of Idaho	The FEIS must acknowledge and analyze fire risks associated with malfunctioning wind turbines posing an ignition risk. Avoidance and minimization methods may include components intended to reduce the likelihood of wildfire ignition and reduce fire spread following ignition.	See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management).
11535-13	Steven Andersen	FAILURE TO COMPLY WITH THE MANAGEMENT OBJECTIVES IN THE MONUMENT RMP The proposed project is inconsistent with the applicable Monument Resource Management Plan – BLM (1986) and effective amendments, and in particular the Fire, Fuel and Vegetation Management Amendment (2008a). Although the siting for the project has not been defined, the DEIS proposes that the 400-plus massive turbines will all be in areas designated for Moderate Use. Moderate Use Areas are suitable for a wide range of uses as long as they are, as the name indicates, "moderate use". Only Intensive Use/Development Areas – another level of land use classification created for a reason – were intended for major or large-scale development such as a major public utility installation; however, no intensive use/development areas were established in the Monument	See responses to comment 11869-8 (in Table A-3i, Fire and Fuels Management), comment 11534-2 (in Table A-3jj, Legal or Policy Compliance), and comment 1049-1 (see in Table A-3i, Fire and Fuels Management). The BLM will continue to manage public lands consistent with the goals and objectives described in the ROD for the Fire, Fuels, and Related Vegetation Management Amendment (FFVM) (BLM 2008a). BLM-required measure GG was added to EIS Appendix 4 and to Table 3.7-3 in Fire and Fuels Management: "MVE's Reclamation Plan (Appendix E of MVE [2023]) would include the goals, objectives, and desired future conditions from BLM (2008a) to the extent practicable."

Comment ID	Commenter	Public Comment	Response to Comment
		RMP. This project is not consistent with a Moderate Use Area, as demonstrated by the definition of an Intensive Use/Development area, which is clearly what was envisioned for such a massive development. Still, a private, free-standing development like this is not a “public utility” lending itself to use of public land for the greater good. The proposal is a private generation project that must tie into a transmission line in order to distribute the generation. Wind turbines without interconnection are mere “accessories” for electrical use. 27 The RMP has a stated goal of “protecting fragile resources and wildlife habitat, preserving natural systems and cultural values, and allowing for nonconsumptive resource uses.”28 The Monument RMP acknowledges the “area is subject to large, repeated fires that degrade wildlife habitat and aggravate soil erosion….”29 It specifies in the Fire Management section that 182,598 areas will be under full fire suppression. The fire management guidance, objectives, policies and actions identified in the Fire, Fuel and Vegetation Management Amendment (2008a) are all impeded, if not made impossible, by the proposed action. Not only does the project increase fire risk, with the exception of Alternative A, low-flying fire suppression aircrafts will be unable to combat fires in this area due to the wind turbines (see flight interference discussion below).	
11535-58	Steven Andersen	While the DEIS acknowledges that the frequency of wildfires is projected to increase, it does not address the full extent of that frequency, nor wind turbine’s effect on the increasing frequency or the interference with wildfire mitigation. Largely due to climate change, on a global level intense wildfires have flared up ranging from California to Russia’s Far East. Moreover, the entire northern hemisphere is grappling with record-breaking heatwaves.201 Because fires are either caused or fueled by extreme heat, even small fire risks pose a significant threat of developing into uncontrollable wildfires that damage large areas. Wind turbines are not exempt from exacerbating the risks wildfires pose or immune to the destruction they cause. The DEIS recognizes the risk of wildfires but fails to include mention of how wind turbines themselves can add to the risk of fire danger. Wind turbines catching fire due to lightning, combustion, or electrical malfunctions are well documented.202 A fire that starts on the wind turbine puts the surrounding locale at risk, especially where temperatures are high, the site is close to dry grasses, and strong winds are present as is the case here.	See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management).
11535-59	Steven Andersen	Additionally, the DEIS makes no mention of smoke effects stemming from wildfires. While the DEIS is quick to announce that any adoption of the proposal would increase fire risk, it fails to even mention the effects of ensuing smoke. Smoke can result in “a large and growing source of air pollution emanating from wildland fires” which can contain “hundreds of chemicals in the form of gases, liquids, and solids.”203 Smoke can pose potential health, visibility, safety, and nuisance problems to local residents, first responders, and wildlife. Moreover, the study area for smoke can reach far beyond that utilized for wildfire ignition.	Regarding wildfire, the BLM has included a discussion of the fire risks, smoke, and ignition in Section 3.7.1.2 (Fire and Fuels Management, Impacts. In the same section, the BLM has also included discussion on fire and ignition risks associated with the wind turbines, as well as how the project will reduce aerial wildfire suppression efficiency.
11535-60	Steven Andersen	The DEIS does not adequately address the impact of fire on vegetation or animals. The DEIS asserts that mitigation efforts will be used to prevent nonnative invasive plant species. Invasive grasses may especially benefit from fire, and once established, may promote recurrent fire to such an extent that native species decline, and native plant communities are converted to invasive annual grasslands. (Brooks and Pyke 2001). Sagebrush is especially vulnerable to fires and may incur both short and long-term effects. (Quinney 2000). Big sagebrush plants are readily killed by fire, while native grasses and forbs are generally unharmed by fires. (USDA 2002a). Frequently repeated fires reduce or prevent re-establishment of sagebrush seedlings from nearby unburned plants. Fires may kill some seeds of native grasses in upper soil layers, significantly reducing seedling emergence in burned areas. (USDA 2002a). Any ensuing fire increases the growth of noxious weeds in the area. Moreover, preserving large fire tolerant trees can help to reduce the fuel load and reduce the intensity of wildfires. (Stop B2H Coalition Opening Comments FEIS (page 11)). The DEIS does not discuss how native vegetation might be affected by increasing fires in the area.	Historic fire regimes and departures from them are discussed in the Affected Environment section (3.7.1.1) of the Fire and Fuels Management section of Chapter 3. The Impacts section (3.7.1.2) also includes a discussion of how the interaction between invasive plants and wildfire may impact sensitive wildlife and plant populations, such as sage-grouse. See also Section 3.15.1.1 for a description of native upland vegetation communities in the analysis area and how they have been affected by past and present trends and actions.
11554-3	Raul Labrador; Idaho Attorney General’s Office	The draft EIS also ignores the Project’s impact on Idaho’s land, namely the ability to fight and prevent fires. Fire season harms Idaho’s people, animals, agriculture, economy, air quality, and environment.6 As the agency recognizes, the Project’s increased use of power transmission would increase the risk of fire. DEIS 3-242. And the agency further recognizes that aviation resources for fire suppression will be increasingly needed but also impeded by the hundreds of skyscraping turbines. DEIS 3-245-51. So the Project would expose Idaho to greater fire danger while simultaneously limiting Idaho’s ability to fight fires. The draft EIS fails to address this dilemma.	See response to comment 11869-8 (in Table A-3i, Fire and Fuels Management).
11869-8	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	The draft EIS also ignores the Project’s impact on Idaho’s land, namely the ability to fight and prevent fires. Fire season harms Idaho’s people, animals, agriculture, economy, air quality, and environment.6 As the agency recognizes, the Project’s increased use of power transmission would increase the risk of fire. DEIS 3-242. And the agency further recognizes that aviation resources for fire suppression will be increasingly needed but also impeded by the hundreds of skyscraping turbines. DEIS 3-245-51. So the Project would expose Idaho to greater fire danger while simultaneously limiting Idaho’s ability to fight fires. The draft EIS fails to address this dilemma.	Additional discussions regarding impacts to aerial wildfire suppression and increased wildfire risk due to project infrastructure, construction, and increased access have been added to Section 3.7.1.2 (Fire and Fuels Management, Impacts). MVE (2023) also includes a Fire Protection and Prevention Plan section in the Health and Safety Plan (Appendix F in MVE [2023]).
11978-124	Magic Valley Energy, LLC	26. Section 3.07.1.2.2 Fire and Fuels - Alternative B (Proposed Action) - Spread “Fragmentation of fuels from project construction and maintenance may indirectly create fuel breaks in this fuel type; however, fuel breaks typically need to be several hundred feet wide and have a strategic placement and design in order to function most effectively.” Can the BLM provide the source stating the efficacy of the width of fuel breaks and provide the width used by the BLM for developing fuel breaks?	A citation has been added to the end of the noted sentence (BLM 2015b).

Comment ID	Commenter	Public Comment	Response to Comment
12090-2	Chris Bender	This land is also used for grazing, which will affect our local livestock. If the lands are not grazed, in droughts (which often happen here) the land is at greater risk of wildfire. 3. Wildfires happen quite frequently in Idaho, and having a number of wind turbines in the area could impact the effectiveness of containing the blaze before it gets out of hand. If our fire crews are impeded in quickly extinguishing wildfires, it could result in extensive loss of property, homes, and life.	The Grazing Coordination Plan is Appendix S in MVE [2023]). Grazing and livestock impacts are also discussed in Section 3.9.1 (Grazing Allotments and Range Socioeconomics). Most grazing limitations proposed for project construction would last up to three seasons for construction and successful interim reclamation. Interannual fuel load variation and its impacts on modeled fire behavior are discussed in the Affected Environment section (3.7.1.1) and in the Impacts section (3.7.1.2) of the Fire and Fuels Management section of Chapter 3. In the latter section, additional discussion is included on the decreased efficiency of aerial wildfire suppression from proposed wind turbines in the analysis area. Table App4-2g (in EIS Appendix 4 [Mitigation]) includes applicant-committed mitigation measures regarding fire and fuels management, including initial suppression and response.
12685-4	Philip Gossi; Gooding-Lincoln County Farm Bureau	• No control of vegetation growth Number one is the loss of feed for livestock. The real devastation will be caused by not being able to use aerial fire suppression. Currently produces have stated that the proposed area burns every four years.	The BLM has provided additional discussion on the interaction between wind turbines and diminished aerial wildfire suppression efficiency. The BLM has also provided additional discussion on the interaction between invasive plants and heightened wildfire risk. See response to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 1049-1 (see in Table A-3i, Fire and Fuels Management).
2930-2	Regina Smith	It does not take an expert to deduce that spotter planes, helicopters and retardant bomber planes cannot fly in wind and smoke and dodge wind turbines safely and effectively doing wildfire suppression activities. Section 3.7.1.1.4 fire suppression on page 3-245. The last line "FAA regulations do not limit the proximity of aircraft to tall structures for fire suppression and engagement is at the pilot's discretion." Fire suppression, as we all know, is not done at the pilot's discretion but at a highly organized level. Maps 3.7-1 and 3-.7-2 show most of this area has burned in the past however even with the best rehabilitation efforts it is not immune to being burned again. Strategic plans rate human life and property as top priorities. With wind turbines potentially 1 mile from farmlands and homes, turbines may impede aerial suppression activities severely. Fire suppression efforts could impose the question where do wind turbines rate if fire threatens private homes, structures (Minidoka NHS), cattle and features like the wind turbines?	The BLM added additional discussion that details the risk the wind turbines pose to aerial wildfire suppression efforts and highlighted how wind turbines will inhibit and impede aerial wildfire response. See response to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 1049-1 (see in Table A-3i, Fire and Fuels Management).
2930-4	Regina Smith	Page 3-242, section 3.7.1.1.1 Fire History. "Human caused ignitions in Sagebrush communities are generally associated with increased human activity along roads, residential areas or areas frequented for recreation." Alternative B proposes nearly 500 miles of new roads to be explored by OHV and other recreation enthusiasts. If bare statistics are an indication, fire activities will increase. Section 3.7.1.1.3 page 3-245 line 9. No one I worked with at BLM ever calculated the spread of fire in chains. We tended to use wind speed. If we had 30 mile an hour winds, the ranch 15 miles away had half an hour to evacuate. (Actual experience). The use of fire retardant dumps is crucial.	The BLM indicates in the Alternative B analysis that this alternative will result in the greatest number of ignition due the greater road network and the assumed greater road traffic on these roads. The BLM has also updated Table 3.7-2 to reflect this (see Section 3.7.1.2.2).
3198-1	Kellen Richard	They are also proposing building in a zone with high fire risk. What does that mean for fire suppression?	Construction in the high fire risk zone would increase ground suppression efficiency but decrease aerial suppression efficiency. This is discussed in the impact analysis in the Fire and Fuels Management section of Chapter 3. See the Section 3.7.1.2.2 subheading “Response and Suppression.”
3997-7	Angelee Eames	5. Wildfires occur all summer and can certainly occur in this 800,000 acres of land. HOw does stopping the blades-allow for flights to fight the fires when the towers are still in their way?	The BLM has included discussion that addressed impacts from the wind turbines on aerial wildfire suppression efficiency. See the Section 3.7.1.2.2 subheading “Response and Suppression.”
6387-15	AJ Whitecotton	Since living in the area for the last 25 years, I have witnessed fire after fire in the valley, one of which threatened to wipeout my subdivision, Sawtooth Acres, in 2007. Several of my past employees have been volunteer firefighters called out to assist BLM on these fires. When these fires occur in late June, July, August and September with all the dry rangegrass, cheatgrass and sagebrush they can travel at a high rate of speed.	The BLM modeled wildfire rate of spread (ROS) in the analysis area for all alternatives. The modeled ROS is predicted to high throughout the entirety of the analysis area. See Section 3.7.1.1.3, Section 3.7.1.1.4, Figure 3.7-3, and the Section 3.7.1.2.2 subheading “Spread.”
6850-1	Name Not Provided	In reference to the EIS 3.7.1.2.6: Cumulative impacts, p. 3-256, it states "The addition of new roads and areas cleared of vegetation provides anchor points and fuel breaks for firefighters during suppression activities while also potentially lessening fire behavior to allow direct attack methods." A fuel break is considered to be between 200-800 ft. in width, while a road is considered to be between 10-24 ft. in width, according to the USDOT. A fuel break can be added along a road. Although the term is broadly used, it is basically a strip or block of land with low or no ignitable vegetation that will reduce flame lengths and the rate of spread of wildfires. A road can be considered a fuel break, but only under the most favorable conditions. Favorable conditions would be considered weather that is not conducive to fire spread, areas of low ignitable vegetation, and adequate time and resources for fighting fires. Fuel break maintenance would be key to prevent fire spread. Mowed fuel breaks are recommended in or near sagebrush areas. This would include 100-300 ft. on each side of the centerline of an existing road. But the width needs to be balanced with other resource values in sage-grouse habitats. https://www.wlfw.org/fuel-breaks-technical-note/ Just as there is a Fire Triangle (heat, oxygen, and fuel), there also a Fire Behavior Triangle (fuel, weather, and topography). Wind, temperature, and humidity also contribute to fire behavior. Wind is the most destructive, since it adds oxygen to the fire and pushes the fire towards new fuel sources. A fuel break is the only leg of the behavior triangle that can be controlled. Fire season in the western US is June through October. https://www.nps.gov/articles/wildland-fire-behavior.htm It should be noted that wind can blow embers up to a mile on the other side of a fuel break, and then ignite more vegetation. The most destructive fires are wind driven, with high heat, and low moisture. https://lpfw.org/fire/fuel-breaks	Text has been added that discusses the limited capacity for access roads, work areas, and other areas with cleared vegetation to function as effective fuel breaks. See the Section 3.7.1.2.2 subheading “Response and Suppression.” See also response to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 1049-1 (see in Table A-3i, Fire and Fuels Management).
6903-10	Todd Wells	The overgrowth of noxious and invasive weed species has been well documented to significantly harm native species and, in some cases, eliminate native species altogether. Without proper grazing management, the	See response to comment 11535-60 (see in Table A-3i, Fire and Fuels Management). See Section 3.9.1; the project is not proposing changes to grazing management.

Comment ID	Commenter	Public Comment	Response to Comment
		overgrowth of the affected range (by non-native and native species) will serve a tremendous amount of wildfire fuel. The long-term destruction of rangeland from wildfires is well documented, not to mention the loss of habitat and native grasses that are associated with range fires. Range land such as this is a fragile ecosystem.	
7321-2	Travis Wells	Windmills will also affect the way that wildfires will be battled. A key part of containing wildfires is reaching the fire with planes and helicopters to apply water and retardant to the fire. If a fire was to break out within the area of the windmills, it could not be accessed by air because the windmills stand in the way. The effect of wildfires on windmills in not known. Windmills are also susceptible to fires themselves. In a study published by Imperial College London, it was discovered that "the researchers estimate that more than 117 separate fires are breaking out in turbines annually." This study was completed on a wind farm that houses approximately 200,000 turbines. We do not need any reason to increase the risk of wildfires, which are hazardous to people and the environment and leave the ground barren for multiple years.	Text has been added that discusses reduced capacity of aerial wildfire suppression due to the presence of windmills. The BLM has also added text discussing the fire risk that wind turbines themselves pose. See section 3.7.1.2.2, sub-headers “Ignition” and “Response and Suppression.” See also response to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 1049-1 (see in Table A-3i, Fire and Fuels Management).
8206-4	Sheryl May	We are concerned about the ability to fight wildfire with this wind turbines in the desert	Wildfire suppression is addressed in section 3.7.1.2.2 “Response and Suppression” subheading of the fire and fuels impacts analysis located in Chapter 3. Additional information can be found in the Applicant-Committed Measures, Fire section of EIS Appendix 4. Fire response and suppression are also discussed in the Fire Protection and Prevention Plan section in the Health and Safety Plan (Appendix F in MVE [2023]). See also response to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 1049-1 (see in Table A-3i, Fire and Fuels Management).
8683-1	Wayne Fischer	3.7 Fire & Fuels The burning of fuels on our forests, deserts, etc. has been occurring for millions of years. Stating that burning is only a recent event is totally wrong. During some of these events, the fire needs to be controlled. There is no way a suppression plane can be used to put out or contain a fire in a specific area with fire suppression planes. The same applied to controlled burns when necessary. Another negative impact of these very tall wind generators is the effect on the Jerome airport, where expansion plans are underway to expand the runway to allow for larger and local fire suppression planes to land and take off. The installation of these very tall wind generators will force the decision to use another airport that will add cost and time for fire suppression of our precious open public lands.	Historic fire regimes and current departures/deviations form historic regimes are discussed in the Fire and Fuels Management Affected Environment section (3.7.1.1). Historically, fires in the analysis area were estimated to be rare, but large and destructive when they did occur. Currently, human activities and invasive plants have resulted in an increase in fire frequency and size in the analysis area. Also see response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8790-3	James Ritchie	Wildfire is a constant threat and who will pay for the loss of aum's and cost for fighting the fires? The draft EIS does not address the placement of the turbines in any of the alternatives nor does it adequately address rehab when decommissioned. Who will pay for any permanent loss of AUM's due to this project?	See response to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).

Geology

Table A-3j. Geology

Comment ID	Commenter	Public Comment	Response to Comment
10427-4	Jess Bartlett	What about the effects of blasting on the extensive system of lava tunnels throughout the area, and the effect that will have on our aquifer?	See response to comment 1042-14 (in Table A-3z, Water and Wetland Resources).
11186-1	Leena Wray, Dominick Wray, Ezra Wray, Destiny Wray, Jonathan Wray, Maria Wray, Joseph Wray, Wilson Wray	Plus it will also destroy our natural sand pits and lava flows that are historic and iconic for the Magic Valley. There is lava tubes that go straight to yellowstone under there and blasting can cause a series of effects from earthquakes to waking up volcanic activity.	See AIB-30 in EIS Appendix 3: Are earthquakes of concern in the vicinity of the project and if not, why?
11195-7	Sandra Callen	This is a fragile volcanic area, blasting in this area for the proposed unsightly turbines will damage our land beyond repair.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11207-1	Charles Carpenter, Cathy McKay	The area is too extensive and potential for damaging the fragile lava rock is frightening.	Basalt is one of the densest types of rock and is not fragile. Basalt density ranges from 168.5 to 181 pounds per cubic foot (Bureau of Reclamation 2001). Site-specific geotechnical evaluation of all project infrastructure locations that would require blasting would be completed prior to construction. Also see response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11400-2	Deborah Hillier	the fault lines and geological effects, [...] None of which have been addressed and assessed from a blasting perspective by those with educated opinions. What does the Idaho Geological Survey Department have to say of this project? Where is their sign off on this? I've attached their map of earthquake activity for FY 2022. 1385 recorded. Seems relevant to this decision going forward.	See AIB-30 in EIS Appendix 3: Are earthquakes of concern in the vicinity of the project and if not, why?
11458-7	Kathy McKenzie	Seismic Ground Disturbance--Seismic vibration side effects not just from blasting for the deep, wide footings needed to hold 400 of these super size turbines in place but from the perpetual vibration of turbine blade rotation over the next 30 years. Any studies done on actual ground movement from this constant vibration of 400 oversized turbines?	AIB-32 was added to EIS Appendix 3: How would vibrations from project wind turbines affect nearby structures?

Comment ID	Commenter	Public Comment	Response to Comment
11490-1	Liz Niccum	I know from personal experience what blasting to remove basalt rock does to the ground. I lived through the construction of St. Lukes Medical Center in Twin Falls. For an entire summer, we experienced earthquakes four to five times a day. The entire house shook. It was horrible. All of the mice escaped from the construction area and invaded our neighborhood.	See MVE's applicant-committed measure 90: Avoid ground blasting within 1,000 feet of residences, water bodies, and wells to the maximum extent possible. MVE would notify residences that are within 1,000 feet of blasting activities. Also, site-specific geotechnical evaluation of all project infrastructure locations that would require blasting would be completed prior to construction.
11521-2	Angela Mooney	In the 7/2021 Lava Wind Project Proposal submitted by Luke of LS Energy, not the misdirecting name of MVE, never once mentions aquifer in the proposal. That alone is alarming, the fact that we have gotten this far without any consideration of that colossal resource, and the colossal, never-before attempted construction of structures that are known to vibrate constantly. To even consider building hundreds of these is such close proximity to each other in porous, fractured lava bed over an aquifer is preposterous. I believe that those in charge of our public lands are simply allowing due process, but not truly considering approving this. [...] There is no study, not even a projected opinion, about the effect of blasting this many holes into a fractured, newly formed, porous geological composition of he nature of the East Snake River aquifer. There is no study, not even a projected opinion from a geologist, a physicist, or a team of such, about the volume and the effect if the vibrations of operating hundred of these structures over said fractured, newly formed, porous geological composition of he nature of the East Snake River aquifer This is very scary to me, as the results would be irreversible.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11535-69	Steven Andersen	Wind turbine construction can lead to alteration of natural drainage patterns (e.g., alterations of slope or implementation of on-site storm water controls) or increase of precipitation infiltration (e.g., from clearing vegetation, backfilling with permeable materials, roadbed fracturing due to heavy vehicles) that can increase pore pressure, which weakens the strength of soils on slopes or causes accelerated soil erosion, thereby creating slope instability.220 This type of hazard is not addressed in the DEIS. Additionally, soil erosion can be aggravated locally through ground surface disturbance. The impact of soil erosion includes soil nutrient loss and degradation of water quality in nearby surface water bodies. Activities that could contribute to soil erosion include: - Ground surface disturbance on site, at borrow sites, and along access roads. Ground surface disturbance would occur during the construction or installation of access roads, wind tower pads, staging areas, lay-down areas, substations, transformer pads, underground cables, and other on-site structures. The extraction of geologic materials from borrow areas or quarries would also result in ground surface disturbance. - Heavy equipment traffic. Heavy vehicles can disturb or destroy originally stable soil conditions and enhance soil erosion by both wind and surface runoff. - Surface runoff pattern disturbance. Construction activities (e.g., grading and excavation) and the implementation of on-site storm water controls (e.g., culverts and drainage ditches along roads) could alter surface runoff patterns by diverting natural drainage into new areas and locally increasing runoff volume.221 Once the environment is damaged, it is difficult to restore, and erosion and desertification in the region will likely be exacerbated.222 Suitable terrain for wind farms includes flat, open terrain, sparse vegetation, low precipitation, and a large number of days with strong wind. "The construction process, including turbine and transformer foundation excavation and backfilling, aerial cable pole foundation construction, underground cable trench excavation and backfilling, booster station construction, access road construction and expansion, will cause vegetation damage, surface disturbances, and soil structure destruction, which results in a decrease in soil erosion resistance and an increase in the sensitivity to wind and hydraulic action leading to soil erosion. Soil erosion by wind farms has certain telltale characteristics, including the coexistence of point and linear erosion, as well as wind and water erosion."223 The DEIS either does not adequately address these concerns or seeks to minimize the project's ultimate impact on the environment. Such impacts cannot be overlooked.	As described in Section 3.13.1.2.2 (Soils, Alternative B [Proposed Action]), the EIS tiers to BLM (2005), which analyzed the potential impacts to soil by erosion from wind energy facilities and found impacts would be minimal to negligible because best management practices (BMPs) would be followed to prevent or address potential increases in soil erosion (2005:6–3).
11788-4	Representative Jack Nelsen	Some the issues still left unaddressed are: 1. The desert area when the project is proposed contains a layer of cinders. When this cinder layer is disturbed by repeated blasting it has (in the past) affected wells in the surrounding areas. This happened specifically when a local canal company did some blasting for a canal, they ended up having to replace numerous domestic wells because of the damage. While I realize not all areas are the same, this remains a real threat to our residents.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11860-5	Shauna Robinson	Although Wilson Butte Cave may be the most well-known cave site in the project area, there are many other known caves within the Shoshone Field Office area. The website for the SFO even states, their field office "is home to the largest known density of caves within the BLM." Lava tube caves are of critical importance culturally, serving, for example, as indigenous shelters and food storage areas. Likewise, bats, birds, and other wildlife use them for roosting sites and shelter. For example, on a recent visit to Wilson Butte Cave, we spotted rock pigeons and deer tracks inside the cave itself. With the dense traffic during the construction phase of the planned Lava Ridge project, vibrations from blasting and/or use of heavy equipment, dust, and noise, could affect the stability of caves, making such events as roof collapses possible. Locating caves is not always the easiest thing either since entrance sizes and shapes vary. It would be very easy for destruction of an entrance to occur through collapsing rocks. The BLM should limit turbines and/or establish wide buffer zones to protect caves and their potential resources. It is a unique natural resource the BLM should ensure remains a part of the SFO public lands.	See response to comment 11207-1 (see in Table A-3j, Geology).
11926-4	Name Not Provided, Susan Jesser	Idaho has fault lines in this proposed area and no one can possibly predict the dangers of the blasting, weight of 400 turbines and other structures.	See AIB-30 in EIS Appendix 3: Are earthquakes of concern in the vicinity of the project and if not, why?

Comment ID	Commenter	Public Comment	Response to Comment
11962-11	Cassie Christensen, Tyler Christensen	The proposed area between Shoshone to Twin Falls and Jerome to Minidoka is compromised with a vast majority of Lava Rock and it lies close to the Crater's of the Moon. 4According to the National Park Service, this area believes a future eruption could happen again. I couldn't find any information in the draft EIS that covered this area of concern. Is it possible, that being so close to the Crater's of the Moon, with the vibrations that these towers, they could create seismic activity and cause an expansion between the tectonic plates that could be detrimental to the area?	See AIB-30 in EIS Appendix 3: Are earthquakes of concern in the vicinity of the project and if not, why? There is no evidence that existing wind energy facilities throughout the northwest have caused seismic activity, and none is expected from the project.
12771-2	Shauna Porter	Are there studies to show what kind of ground vibrations we will experience with these wind turbines? These are bigger than any other wind turbines around.	See response to comment 11458-7 (see in Table A-3j, Geology).
12865-1	Regina Smith	Volume one, 3.13 soils This section starts out with several issues analysed in brief. AIB – 30: Are earthquakes of concern in the vicinity of the project, and if not, why? [...] Both questions are worded to presuppose the answer is no. Not even open minded questions. Volume 3, pg. App3-11 state. "The impact context is so low that detailed analysis is not needed to determine significance." followed by " Earthquake stability concerns are AIB due to the relatively thick, basalt geologic units in the vicinity of the project". No data was given to support this statement.	A reference was added to AIB-30 to support the conclusion.
12865-6	Regina Smith	Subject 3.13 soils Volume one, 3.13 soils This section starts out with several issues analysed in brief. [...] AIB – 31: Is the surface geology in the siting corridors suitable for the proposed project infrastructure? Is collapse/subsidence a concern, and if not, why? Both questions are worded to presuppose the answer is no. Not even open minded questions. [...] Regarding AIB – 31: Maybe they are asking the wrong question. On page 3–359 it is stated "the basalt would be re-moved through blasting". The real question here is how will the blasting affect the geology. Two years of multiple daily, blasting to the depth of 10-60 feet for guy anchors or 8-20 feet for concrete piers or 25-55 feet for transmission structures or 8-12 feet by 50-75 feet for turbine foundations could have serious repercussions.	Additional text was added to AIB-30 and AIB-31 to clarify that basalt is one of the densest types of rock. Also see response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12982-11	Jerry Taylor	When I attended Jerome High School, I worked for Smith Drilling and Pump Company after school, on weekends and during summer breaks as a "driller's helper" and as a laborer pulling and installing well pipe and pumps. I worked for 4 seasoned well drillers in that time and I'm familiar with drilling in basalt formations. I assisted in drilling a large irrigation well on Signal Butte, east of Jerome with a senior driller named Sy Robins for a man named John McGonagal (sp?). This well was meant to irrigate land that had just been taken out of sagebrush. I believe the land was acquired through the Desert Land Entry Program. As I recall, the well was over 500 feet deep and 18 inches wide at the surface. This farm is located a few miles west of the Lava Ridge Project area. The drilling was hard and the driller was always on alert as we were drilling with a "72 Star cable tool rig", which literally pounded its way through the substrate with a "string of tools" (i.e. rope socket, drill stem and drill bit) suspended by a heavy cable. The string of tools, weighing between, 1,500 and over 2,000 lbs. was lifted and dropped repeatedly, with the force of gravity, by the "spuder gear arms", then periodically the drill hole was cleaned of "drill shavings" by running a tool called a "bail bucket" down the hole, which was attached to a smaller cable. Drilling would then resume. The driller's purpose was to drill a straight hole, while avoiding sticking a string or tools down the hole. Drilling progress in basalt could go from inches per hour to a sudden drop of feet or yards in a split second, when a lava tube or cavern was encountered. Long story short, the hardness and variable porosity of basalt lava makes it a challenge to drill and nearly impossible to predict what lies below. Likewise, basalt presents challenges when blasting to remove an obstruction in the drill hole. Since basalt is hard to the point of being brittle, when a cavity or tube is encountered by the drill bit often times large chunks of lava break off. If they fall away and into a cavity off to the side, no problem, but if a fractured chunk falls to the side and blocks part of the hole it can throw the string of tools out of plumb. If it can't be drilled through, it has to be blasted. This was done by suspending sticks of dynamite, wrapped as a bundle, down the hole by what they called a "zip line". The "zip line" was a two strand electrical wire cord sufficient to carry an electrical current from the ignition source down to the blasting cap(s) in the dynamite bundle. The drillers I worked for hated to use dynamite down the hole in basalt because the blast energy could travel in strange, unpredictable ways and create fractures above, below or to the sides creating even more problems. When drilling in basalt went well, with minimal fracturing or surprises, only the top 18 feet required steel casing (by state law). If the basalt was more porous and fractured, steel casing sometimes had to be driven to a depth past the fractured area(s) to prevent future problems in drilling or later when installing the pump and associated pipe. I offer this perspective to illustrate that one never knows what to expect from blasting in basalt lava formations.	MVE has added applicant-committed measures 91 to 94 to reduce the effects from blasting. For Alternative B with Additional Measures and Alternatives C–E and the Preferred Alternative, the BLM has also added additional Project-specific measures yyy through bbbb to further avoid and minimize potential effects from project blasting.
1689-5	Tammy Larson	Another concern of mine is the caves and craters that will be destroyed. Wilson butte cave has a lot of Native American history inside that will be destroyed. The Dietrich crater is a place many people hike to and spend their days enjoying. That will no longer be accessible and a great past time will be lost.	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
3073-3	Becky Ipsen	The vibration in the ground alone should be studied.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3140-3	Susan Page	There has been no environmental study of the impact of the Lava strata vs the heavy equipment required to drive over the Snake River Plain.	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).

Comment ID	Commenter	Public Comment	Response to Comment
			The BLM also added analysis to Section 3.17 (Water and Wetland Resources) describing whether there is the potential for project impacts to the ESPA.
3171-2	Name Not Provided	there is nothing in the eis that addresses if the project can effect volcanic activity.	There is no evidence that existing wind energy facilities throughout the northwest and other areas that are seismically active have caused further seismic activity. Thus, none is expected as a result of the project.
3230-4	Gary Carney	The Snake River Plain is one of few volcanic hot spots in the world that sits above the ocean floor. The Kimama Desert plays a major role when discussing the future of the Yellowstone Super-Volcano. The ruminants of the blast are throughout the Kimama Desert including the epicenter of many of the past Yellowstone Eruptions. The Snake River plains will play a major part in the geological studies of past events. The damage done to the landscape is going to extremely beneficial to understanding the Yellowstone Super-Volcano and a considerable amount of this geographical pattern will covered up through roads and terminated through blasting that will be necessary. More due diligence is required and necessary to make an informed decision.	See response to comment 3171-2.
3302-6	Susan Canham	Part of each turbine is the base that it securely stands on, How far into the earth are those bases driven	Turbine foundations are described in MVE (2023).
3360-1	Sue Page	What will the exhilarating seismic experience happen to the aquifer? The environment around the area such as Wilson_Butte_Cave? The Lava tunes underground? Craters of the Moon or any other historical sites? There hasn't been any environmental testing to take into accounts the "what if". Our land should not be an experimental site for the tallest, biggest wind farm.	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
3542-4	Sue Page	There hasn't been any environmental testing to determine if this Lava Plain can sustain the vibrations from the heavy-duty equipment haulers, blasting over 500 days, the weight of over 2 million pounds of cement for just 1 of the foundations not including the weight of the tower and blades. What will all this weight, vibrations and the constant vibration from each wind turbine going to do to the Lava strata?	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
3768-2	Sue Page	Is there concerns that the proposed need to blast this area twice a day for over 500 days or the tonnage of the equipment needed to haul in these massive turbines cause for concern that the land may not be sturdy enough to withstand the constant vibration? How can they calculate the blast results or the heavy equipment needs of the strata when there are too many resultant with lava layers? The only studies I have found are drilling no blasting.	See response to comment 3542-4 (see in Table A-3j, Geology).
3768-4	Sue Page	Where is the consideration for the constant heavy equipment over the public roads and on the vibration on top of the aquifer system this will cause?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3781-1	Adrian Arp	I attended an information meeting concerning the Lava Ridge project last evening at the College of Southern Idaho. One significant opposition item was brought forth by a former Twin Falls County Canal board member. He revealed the real danger of blasting which alone should be sufficient to cancel the wind farms in Southern Idaho. He indicated they blasted a small amount of lava for a project. It was a small blast compared to the proposed Lava Ridge blasting. He said it affected the water and irrigation wells within 3/4 of a mile radius. They had to drill deeper and put in casing to restore water which was very expensive. Because of the nature of lava flows there are already cracks. Blasting he feels will cause irreparable damage to the water supplies in the Magic Valley that could include cities water supplies. The article below points out some real problems with green energy. PLEASE CANCEL THE LAVA RIDGE WIND FARM PROJECT. It is not sustainable as the following article indicates and must rely on fossil fuels to provide the wind towers, etc. They also need a fossil fuel backup with natural gas since wind power is not 24/7. Please read the following: [Article links are contained in comment w/text copied into it]	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3998-1	Sue Page	https://en.m.wikipedia.org/wiki/Wilson_Butte_Cave <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FWilson_Butte_Cave&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C024cd4ea8d5d49dd591208db190a8370%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638131305183317906%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000%7C%7C%7C&sdata=rfMvNc4bcPzLp7TlaUEGsn8l0sWpyl%2FdLFHCa2F6cso%3D&reserved=0> I cannot find any study on the effects to the lava fields, the underground tunes and the aquifer when foundation construction begins. It's my understanding there will be blasting twice a day for over 500 days. 500 days of mini earthquakes in Volcanic Geographical Axial sounds ridiculous. What do you think, that much earth disruption will have to Wilson Butte Cave? To the shifting soil?	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
4220-2	Sue Page	The foundations will require blasting of 2 times per day for 500 days. Blasting into the Lava beds, which are part of the Volcanic Geographical Axial spanning from Yellowstone eastward through the Craters of the Moon eastward along the Snake River Plain, without knowing how the Lava tunes will be effected until tried!!! Is a joke. How will that blasting effect the schools in Eden? Structures at Minidoka National Historic Site or the aquifer running underground? Once blasting starts the ramifications could be too late	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
4480-1	Sue Page	This is a Volcanic Geographical Study for your review. Lava Ridge Wind Project falls within the Volcanic axial area spanning from Yellowstone National Park through Craters of the Moon then Shoshone Lava fields	See response to comment 3230-4 (see in Table A-3j, Geology).

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		westward. What will happen when construction begins for 400 Space Needle sized turbine foundations dug a minimum of 50 to 60 feet deep with 10 to 20 ft deep x 60 feet in diameter concrete slabs approximately 400 cubic yards of concrete is laid? Will 400 holes in this area activated dormant Volcanic activity? How do you know it won't? Have there been windfarms of this size created within Volcanic Geographical areas?	
4485-1	Sue Page	https://www.cnbc.com/2023/01/24/ge-forecasts-weak-2023-profit-on-troubles-at-renewable-business.html Interesting article should give pause to building 400 turbines at Lava Ridge and any other energy proposals. Secondly, what will construction do to the Lava Fields once 400 - 50 to 60 feet deep foundations with tons of steel and over 400 cubic yards of cement are poured for each turbine? Please stop Lava Ridge.	See response to comment 4220-2 (see in Table A-3j, Geology).
4536-1	Sue Page	Has anyone asked what will happen when 400 crates are dug into the volcanic areas proposed for these beasts? The construction of these turbine foundations will destroy areas within the volcanic axial which stretches from Yellowstone, which we know is currently active, through the Craters of the Moon through the Shoshone Lava fields. "The progression of hotspot volanism can be seen along the Snake River Plain. Volcanic features at CRMO are the result of two different regionally extensive processes. The immediate area (where the visitor's center is located) is part of the Eastern Snake River Plain on the track of the Yellowstone hotspot. This region contains both old and young deposits. The larger regional area is part of the Basin and Range Province, a continental rift zone containing young volcanic deposits.Volcanism at Craters of the Moon National Monument and Preserve and the processes that drive it are complex. If you are interested in other volcanoes formed by the same processes, check out the geology in Hagerman Fossil Beds National Monument (ID), John Day Fossil Beds National Monument (OR), and Yellowstone National Park." We must stop the destruction of these fields. Will the excavation methods disrupt a sleeping gift hidden under our land?	See response to comment 3230-4 (see in Table A-3j, Geology).
5189-4	Traci Wood	What about the blasting that could impact the cave systems out in the desert? The impact statement say it won't, but how can you really know.	See responses to comments 11207-1 (see in Table A-3j, Geology) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
5213-2	Sue Page	No study on the effects of this amount of blasting in relationship to the surrounding land, the volcanic caves and lava tunes underground. Further, how far underground east or west will possible fractures go in the lava strata?	See response to comment 4220-2 (see in Table A-3j, Geology).
5464-1	Sue Page	The Environmental Impact Statement seems to have failed to provide on-site testing of the Lava strata and the effects this project can present from collapse of lava tubes to the endangered species to contamination even destructionof Southern Idaho's sole source of drinking water. There has not been any on-site physical study conducted proving the lava strata's capabilities to withstand the magnitude of stress, weight, vibrations associated with not only the construction of the project but with the constant vibrations and sounds of the wind turbines on a daily basis. There must be actual on-site geophysical testing required to determine if the Snake River Plain Aquifer can sustain: 1. the number of structures proposed at the heights, weighs and magnitude proposed And 2. the effects of blasting into the lava strata twice daily for over 500 days And 3. the tonnage of the actual foundations with the turbines spinning daily and the vibrations they will make And 4. the weather vibrations of hot, cold and wind gusts And 5. the constant vibration of the heavy equipment and machinery used for construction. There has not been any substantial testing proving the Snake River Plain Aquifer is capable of withstanding the effects of this many 740ft Space Needle sized turbines. https://www.windfarmbop.com/the-importance-of-the-geophysical-survey-for-a-wind-farm/#comment-28528 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.windfarmbop.com%2Fthe-importance-of-the-geophysical-survey-for-a-wind-farm%2F%23comment-28528&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cf5dfa1dc372f4086d7c708db2892385a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638148380703810408%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=F0t3sscsnB6ljyHuDh7EPwoBdIIbdA%2B7JB76Pv9s1HI%3D&reserved=0>	See response to comment 4220-2 (see in Table A-3j, Geology).
6163-1	Sue Page	The geologist provides the how and why the water flows, the explanation of the lava tubes and the fractures in the rocks and sides of the mountains. This video was created before this project and is a totally independent source for your consideration. What I have learned, between this video and from the last video sent is that the underground water system is fragile. There has been NO testing on the lava strata to date. There has been speculation that the ground is solid and nothing will happen. BUT, the lava tubes are fragile, they can crack and collapse and if they develop further fractures from blasting, vibrations of heavy equipment, what will happen.	See response to comment 4220-2 (see in Table A-3j, Geology).
6167-1	Sue Page	I beg you to watch the attached video about the Lava tubes in the Craters of the Moon and see how fragile they are. They collapse naturally just from the weather changes of hot and cold weather. These lava tubes extend	See response to comment 4220-2 (see in Table A-3j, Geology).

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		further west through the Snake River Plain providing Southern Idaho with its sole source of drinking water. There hasn't been any study conducted on the effects blasting, over twice a day x 500+ days, the effects of the vibrations of the heavy equipment or the weight of the foundations and vibrations of the spinning blades will have on the lava tubes created by pillow basalt.	
6167-3	Sue Page	Once blasting starts and the ground shaking starts it will be too late. There is no repair of what Mother Nature created. We have no idea how far and wide the damage will go. No one knows how the fractures in the pillow basalt will react. No one! There has been no testing for anything of this magnitude on lava strata.	See response to comment 4220-2 (see in Table A-3j, Geology).
6868-2	Barbara Martien	Noted that the following areas were not completely covered. [...] The depth and size of holes to be blasted. Stability of Lava rock.	See response to comment 4220-2 (see in Table A-3j, Geology).
7320-8	Lora Ohlensehlen	My concern is about the blasting of the lava rock to create the holes for bases for these gigantic windmills. The blasting bases for fences in the four grazing allotments, and for the significant miles of road that is proposed to be built. Additionally, there will be heavy use of these roads by various truckers bringing in supplies for this project. My concern is that the consequences of this that extreme use of heavy equipment and density of trucks for multiple years. It is unknown what long term consequences this will have to the environment. I am not convinced that the proposed wind mills can be built without compromising the current environment.	See response to comment 4220-2 (see in Table A-3j, Geology).
7369-1	Scott Prow	To yield 400 to 194 wind turbines (EIS p. ES-xi), 56-38 miles of underground collector lines (EIS p. ES-xii), and multiple substations (EIS p. ES-ix) it will require blasting twice per day for 525 days (EIS p. 3-12). This process will permanently impact soils (EIS p. ES-xxi) and have an irreversible loss of basalt(EIS p. 3-361). All this will also cause the possible loss of paleontological resources (EIS p. ES-xx). Anyone who is from Southern Idaho knows that the desert is full of caves and lava tubes. The EIS admits that going forward with this project that the desert will be permanently damaged or at the very least take 125 years for a variety of areas to recover (EIS p. 3-361). Per Idaho Statute 18-7035: DAMAGING CAVES OR CAVERNS if I were to go out into the desert and damage or deface a cave, I would be guilty of a misdemeanor (18-7035 DAMAGING CAVES OR CAVERNS UNLAWFUL -- PENALTY). But if the federal government allows this project to go forward an outside entity will be allowed to come into our state and permanently destroy and scar our land.	See response to comment 4220-2 (see in Table A-3j, Geology).
7548-2	Douglas Miller	I am compelled to point out that the assertion in the draft EIS (Appendix 3) that seismic hazards in the Lava Ridge project area do not merit detailed analysis is not consistent with peer-reviewed science and my personal professional observation as an earthquake seismologist. The risk of a devastating earthquake(s) is very real. To wit, the 1983 M7.3 Borah Peak was one of the largest earthquakes ever recorded in Idaho and the Intermountain West (for example, Breckenridge, 1986. Idaho Geological Survey.) Severe ground shaking was felt over 100 miles away - I know because I felt the frightening shaking in Idaho Falls. Lava Ridge is a comparable epicentral distance and the travel path of seismic energy - both compressional and shear waves - comprises similar geology. Thus, the potential for a severe earthquake at Lava Ridge is very real. Further, design of wind turbines should include potential seismic loads (see Prowell and Veers, 2009. Assessment of Wind Turbine Seismic Risk: Existing Literature and Simple Study of Tower Moment Demand: Sandia National Laboratories Report SAND2009-1100.) Since a meaningful analysis of seismic hazards and a concomitant risk assessment has not been conducted, Alternative A "No Build" is the only acceptable option.	See response to comment 3542-4 (see in Table A-3j, Geology).
8256-3	Sue Page	This area is also part of the Volcanic Geographical Axial spanning westward from Yellowstone through Craters of the Moon, Wilson_Butte_Cave, this project site, through Shoshone, Salmon Falls, Thousand Springs and beyond. There hasn't been any geophysical testing on-site to prove the infrastructure is capable of handling the blasting, heavyweight equipment and vehicles or the tonnage of the wind turbines and vibrations.	See response to comment 4220-2 (see in Table A-3j, Geology).
8421-5	Brian Olmstead	Next, When the Milner Gooding Canal and North Side Canals were blasted through Lava in the early 1900s, they both had hundreds of leaks develop from the canal to the aquifer that took years to repair. Numerous times since then, new sinkholes have developed in these canals and a good portion of those developed right after far away earthquakes of any magnitude. I would be very surprised if the hundreds of mega-blasts required for this project don't cause new and possibly disastrous sinkholes to develop in the Near-by Milner Gooding Canal. That is exactly why The Mile Post 31 recharge site in the Lava Ridge Project Area is the best recharge site in Idaho! There are hundreds of previously unknown vents, fissures, tubes, and cracks that easily transport up to 600 cubic feet per second of water from the canal to the aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8790-7	James Ritchie	6. We irrigate approximately 1500 acres with a combination of groundwater and surface water through the Gooding-Milner canal. The draft EIS does not address the blasting involved in placing the concrete for the base of the wind towers. Lava rock is very porous and blasting near a canal could very easily open up a fissure taking precious irrigation water. Also I am concerned for irrigation and domestic wells and what effect the blasting will have on them.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
9140-1	Regina Smith	Subject: Lava Ridge wind turbines and geology/seismic activity It has occurred to me the geology of the project area is not discussed in the DEIS. Neither is there any discussion on seismic activity in the area. The weight of wind turbines combined with the concrete foundations must be considerable. Two years of daily blasting is proposed. Multiply that by 400 and an additional wind farm adjacent (Taurus) set in an area of seismic activity and what are the impacts? I do not see that even a desktop survey of the geological maps has been done. There	See responses to comments 1042-14 (see in Table A-3z, Water and Wetland Resources) and 4220-2 (see in Table A-3j, Geology).

Comment ID	Commenter	Public Comment	Response to Comment
		have been numerous comments on the aquifer, water diversion and impacts to wells. There have been no substantive answers. There is no discussion in the DEIS on geological structure. With the porous nature of the volcanic rock, years of blasting, a shallow aquifer and seismic activity combined could result in catastrophic impacts. Yet there are no studies or analysis presented either from the project area or other similar ground disturbing projects. Not even conjectures. Local communities, residents, farmers and ranchers are not willing to be subjected to this “great experiment”. Texas is in the news today having a huge sinkhole opening up in a small town outside of Houston. The area was used for underground storage/disposal. One of the causes cited was the weight of the water from recent storms. Neither BLM or MVE offer any assurance that something similar couldn’t happen here. I urge you to select alternative A, no action.	
9266-2	Laura Broussard	Study the geologic effects left behind.	See response to comment 4220-2 (see in Table A-3j, Geology).
9275-4	AJ Whitecotton	I am also greatly concerned about the aquifer and what damage blasting will do to a base that is made from honey combed rocks. Lava rock is porous in the first place and not suited to weight bearing loads of the magnitude of windmills without major footings. Also the constant vibrations that windmills will create I do not think have been evaluated over a long period of time. Since our aquifer is a main water source in Idaho any damage to it could prove catastrophic. Since I have searched and found only studies of actual lava domes or active volcanoes but nothing in depth about building structures of the magnitude discussed in this proposal I would say that a massive amount of study needs to be done on the geology of the area and it’s abilities to support these types of units without any damage to the underlying aquifer.	See response to comment 4220-2 (see in Table A-3j, Geology).
9896-1	AJ Whitecotton	I learned that this project sits on top of the Snake River Plain Aquifer that supplies water to both the Magic Valley and the Treasure Valley. The site that is proposed is made of basalt lava flows. This fragile bedrock provides a natural purification system and channeling for the water in the Snake River Plain aquifer. I have also learned that to install these massive towers, that hundreds if not thousands of holes will need to be "blasted" into that lava bed that makes up the aquifer. Blasting fragile material like this and placing 400+ 740-foot wind towers into the lava bed to me does not sound like the best location for a wind turbine farm. In my opinion the continuous stress on these towers from wind and weather and weight over time could, in my opinion lead to damage to the lava bed and the aquifer and its ability to supply water to our communities without interruption or worst total blockage.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

Mineral Resources

Table A-3k. Mineral Resources

Comment ID	Commenter	Public Comment	Response to Comment
11491-18	Dean Dimond, Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: [...] 13.Need information on actual BLM USA mineral estate status and need new analysis of effects on oil, gas and mining leases, claims, etc., [...]	The BLM discussed the consideration of mineral resources within the draft EIS in EIS Appendix 3 under AIB-17, AIB-18, and AIB-19. The BLM reviewed existing data sources and determined that there are no known locatable minerals located in the siting corridors. To avoid conflict between the project and locatable mineral claims during evaluation of MVE’s ROW application, the BLM temporarily segregated a 106,556-acre area from locatable mineral entry. There are saleable minerals in the siting corridors—volcanic (basalt) and quaternary sediments—none of which are desirable or rare. The project would not preclude the extraction of saleable materials outside of the siting corridors. Applications for saleable minerals on BLM public lands would be evaluated when requests are received. The BLM reviewed existing data sources and determined that there are no known leasable minerals located in the siting corridors.
12240-2	Dean Dimond	The DEIS doesn’t say were they are going to get the gravel for there concrete. With the amounts that will be need if they plan on getting it locally it will total deplete our sources. This would have a huge negative affect on the Magic Valley forever. The DEIS does sase they are planning on crushing Lava Rock for gravel. Lava rock makes a soft gravel and can not be used for roads. Other wise road that need to hold over size loads.	Section 2.8 of MVE (2023) discusses the plans for acquiring and using mineral materials including gravel for roads. Preliminary geotechnical investigations will inform whether the aggregate generated from on-site is suitable for project uses. In the event the material is not suitable, commercial sources in the region will be used to fulfill the project needs.
6387-6	AJ Whitecotton	This has been in very short supply in the Magic Valley for the last two years. Due to my contacts, I have been able to procure concrete for projects I have been involved with. It has also become an expensive commodity. The nearest cement plant is located near Durfee, Oregon. Assuming the project has its own on site plant, this will still necessitate many cement hauling trips to and from the plant to provide the quantity of needed material for this project.	Section 2.8 of MVE (2023) discusses the plans for acquiring and using mineral materials including concrete. Temporary concrete batch plants will likely be established within the project laydown yards for preparing and mixing the concrete used for foundations of wind turbines, substation equipment, transmission structures, the operations and maintenance buildings, and other necessary project facilities. Local concrete suppliers may also be used to provide truck deliveries of concrete. The batch plant complexes consist of a mixing plant, areas for sand and aggregate stockpiles, an access road, and truck loadout and around areas. The batch plants themselves consist of cement storage silos, water and mixture tanks, aggregate hoppers, and conveyors to deliver different materials. The batch plants will be located within project laydown yards or in separate temporary batch yards close to the sites where foundations are being poured. The batch plants will be relocated as needed to maintain efficient operation.

Hazardous Materials and Solid Waste

Table A-3l. Hazardous Materials and Solid Waste

Comment ID	Commenter	Public Comment	Response to Comment
11326-3	Filip Camacho, Tasha Sorensen	The BLM should also consider how developers may dispose of wind towers at the end of a project's life and analyze the impacts of such disposal. There are examples across the West of improper disposal of wind turbines filling up landfills, and other potentially harmful ways of managing waste associated with renewable energy development.10 Many rural communities where these projects will be located do not have sufficient landfill or recycling facilities to accommodate future end-of-life needs for these projects. The BLM should consider these and other potential impacts of decommissioning wind projects.	In accordance with the Decommissioning Plan (Appendix L in MVE [2023]), all dismantling, removal, recycling, and disposal of materials generated during decommissioning will comply with rules, regulations, and prevailing laws at the time decommissioning is initiated, and will use approved local or regional disposal or recycling sites as available. Recyclable materials will be recycled to the furthest extent practicable. Non-recyclable materials will be disposed of in accordance with state and federal law. Also in compliance with regulations found in 43 CFR 2805.20, MVE will be required to furnish a reclamation bond to cover any losses, damages, or injury to human health, the environment, or property in connection with the use and occupancy of the ROW, including costs associated with terminating the grant, and to secure all obligations imposed by the grant and applicable laws and regulation.
11491-27	Dean Dimond, Jennie Bateman	In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: 1. plan for mitigation of hazardous waste/oil accidental spills,	Measures to minimize or avoid impacts from the potential for leaks and spills of oil and other hazardous materials are described in the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]). Also see Section F-5.1 (Hazardous Materials Management Plan) in the Health and Safety Plan (Appendix F in MVE [2023]).
11667-5	Alisa Bowman	Concern: Hydraulic fluid leaks and ground contamination Oil leaks from wind turbines can pollute soil and water. The lubricant is not mother's milk. It is a synthetic-based oil that needs to be replaced on a regular basis. If these towers are not maintained and serviced or the gears malfunction, inevitably oil leaks and seeps into the ground making it's way to our soil and into the water supply.	MVE categorized hydraulic fluid as a hazardous material in MVE (2023). The Health and Safety Plan (Appendix F in MVE [2023]) addresses how the material will be handled, transported, used, and disposed of in their Hazardous Material Program. See the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]) for measures regarding spilled materials.
11871-113	WildLands Defense	"PGE has experienced 10 transformer failures at Biglow Canyon that have collectively leaked 3,000 gallons of mineral oil to the ground surrounding turbines and caused two fires. Pictured above, pad-mount transformers sit in cabinets below each turbine at Biglow Canyon." Lenna Cope, a project specialist at PGE, told regulators during a public meeting transformer failures are an industry-wide problem and PGE was replacing them with transformers with different specifications when they failed. She said the demand on turbine transformers is unique because it rises and falls with rapid changes in the wind, and resulting temperature changes can degrade transformer oil and insulators, leading to the buildup of combustible gasses. The gas accumulation can over pressurize a tank, cause a rupture or, if there's an electrical arc, flash off and cause an explosion.	Section 2.10 of MVE (2023) discusses mineral oil use and the incorporation of leak detection and containment systems into the transformers to make the potential risk for accidental spills or malfunctions low. Also in compliance with regulations found in 43 CFR 2805.20, MVE will be required to furnish a reclamation bond to cover any losses, damages, or injury to human health, the environment, or property in connection with the use and occupancy of the ROW.
11873-7	Mary Schwartz, Frank Schwartz	7. The DEIS does not address waste management associated with turbine blades, generators, batteries, transformers and other infrastructure for either the operations phase (replacement of failed/defective components) or the end-of-life decommissioning and disposition of all of the wind farm components. Turbine blades themselves represent a very significant waste volume and a very large associated environmental impact. The disposition path for all infrastructure (towers, generators, turbine blades, batteries, transformers, concrete, underground infrastructure, etc.) must be addressed in this DEIS. This DEIS is grossly incomplete without the analysis of/inclusion of the environmental impacts associated with this waste issue. Quantification of the waste volumes and the intended disposition path and disposal locations must be addressed. The commitment in the DEIS for the development of waste management plans is meaningless without the analysis of the associated environmental impacts, which is the purpose of the DEIS.	In accordance with the Decommissioning Plan (Appendix L in MVE [2023]), all dismantling, removal, recycling, and disposal of materials generated during decommissioning will comply with rules, regulations, and prevailing laws at the time decommissioning is initiated, and will use approved local or regional disposal or recycling sites as available. Recyclable materials will be recycled to the furthest extent practicable. Non-recyclable materials will be disposed of in accordance with state and federal law. Also mentioned in Section L-2 in the Decommissioning Plan, MVE will prioritize the re-use, recycling, or scrap value of decommissioned Project components over direct disposal in approved landfill facilities. Many of the metal project components have potential for re-use or scrap value, depending on the market value of the metals at the time of decommissioning. New industrial technologies that recycle turbine blades are currently gaining traction in the marketplace and are expected to increase in utilization over the lifespan of the project. Should these re-use, recycling, or scrap disposal methods become uneconomic by the end of the project lifespan, MVE would seek appropriate industrial disposal sites or landfill locations that are permitted to accept the project components. MVE would not seek to force landfill facilities to accept the disposal of components if the facility objects to their disposal.
11926-11	Name Not Provided, Susan Jesser	Wind turbines are not green or clean energy. How many gallons of oil does each turbine take to operate? Think about all the semi-trucks, cranes, bulldozers, etc. that will be needed to construct/maintain this project. Most blades are not recycled due to the cost and the chemical composition in the blades so end up in Casper Regional Landfill in Wyoming.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Refer also to applicant-committed measure 84 "MVE would prioritize the re-use, recycling, or scrap value of decommissioned project components over direct disposal in approved landfill facilities. Recyclable materials would be recycled to the furthest extent practicable. Non-recyclable materials would be disposed of in accordance with state and federal law."
12226-2	Ted Deetz	EIS Section AIB46 states that "MVE would develop and implement a hazardous materials management plan". Comment: Again, plans should be developed prior to approval. There is no mention of the long term effects on the ESPA. The supposed plan will only address Storage, Use, Transportation and Disposal of hazardous materials and no mention of prevention of hazardous materials such as the tons of ammonium nitrate fuel residue that is forced into the basalt and surrounding environment. This is not a "Green Project".	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). MVE also added details to MVE (2023) regarding blasting and the Blasting Plan Methodology (Appendix I in MVE [2023]).
12228-1	Jane Dyndiuk	As a resident of Blaine County I am most concerned with the risk to our aquifer should oil leak into the soil.	See AIB-47 for information on inadvertent spills or leaks and AIB-48 for information on stormwater runoff (EIS Appendix 3). MVE would develop and implement a Hazardous Materials Management Plan and a Waste Management Plan as part of the Health and Safety Plan (Appendix F in MVE [2023]) and the Spill Prevention,

Comment ID	Commenter	Public Comment	Response to Comment
			Control, and Countermeasures Plan (Appendix G in MVE [2023]) to minimize and avoid the potential risk of surface and groundwater contamination from inadvertent spills and leaks (applicant-committed measures 66, 67, and 77). These plans would address storage, use, transportation, and disposal protocols and BMPs, as well as inspection and training protocols and emergency response procedures for hazardous materials and wastes (applicant-committed measures 68–77). Secondary containment shall be provided for all on-site hazardous materials and waste storage, including fuel (applicant-committed measure 70). With these plans and prevention measures in place, the risk of potential impacts to surface and groundwater quality from inadvertent leaks or spills would be low.
12307-11	Dean Dimond	plan for mitigation of hazardous waste/oil accidental spills	See response to comment 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
12351-5	Julie C. Lynn	Imagine the effects of an oil spill from turbines into the very porous lava beds which are above one of the nation's largest aquifers.	See response to comment 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
12982-15	Jerry Taylor	The DEIS is vague about what happens to the waste generated by Lava Ridge. It says that MVE reports that strides are being made toward recycling of worn out blades. No specifics are offered. MVE says it will contract with landfills in the area to dispose of materials there, but landfill space across the state is fully obligated and shrinking fast. These are unreliable promises. What about the heavy metals associated with batteries? The DEIS should be suspended until these issues are analyzed in full and addressed. ROW bonding alternatives should be fleshed out, analyzed and disclosed upfront, to insure that the company doesn't walk away and leave the county, state or federal government holding the bag.	See response to comment 11326-3 (see in Table A-3l, Hazardous Materials and Solid Waste).
5189-8	Traci Wood	900 tons of steal, 2,500 tons of concrete and 45 tons of non recyclable plastic all for just 1 turbine. And when it's retired, the concrete gets left in the ground. Where do the broken blades end up? Landfills in Wyoming or other states? What about all the oil that is used per turbine. What makes it so green with the 40 acres of battery storage? Batteries that are made by mining the components. Or if there are oil leaks that seep in to the ground. I read it's a synthetic oil. That is also not great for the environment.	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste), 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste), 11326-3 (see in Table A-3l, Hazardous Materials and Solid Waste), and 11926-11 (see in Table A-3l, Hazardous Materials and Solid Waste).
6356-1	Gayle Michelucci	THE MOTORS USE OIL. OIL CONTAMINATES THE ENIVIROMEMNT. I DO NOT TRUST THE MAINTENENCE & SERVICE PERSONAL TO NOT DISCARD OIL PURPOSELY OUT OF LAZINESS OR ACCIDENTALLY INTO OUR SOIL. CREATING DAMAGE TO THE LAND, AGRICULTURE & ANIMALS. TURBINES ARE MORE UP KEEP. I DO NOT TRUST IT WILL BE DONE AS IT SHOULD BE. WHERE WOULD ALL THE USED OIL BE DICARDED AND HOW MUCH WILL IT COST TO KEEP UP TURBINES WITH OIL.	See response to comment 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
6866-6	David Briggs	There are numerous recent news stories from around the world about these towers collapsing.. And what is to become of the used blades? What is the disposal plan for these huge blades that can't be recycled and have a lifespan of less than 20 years?	The wind turbines layouts will be designed with specific setbacks from residences, developments, and other uses in the project area, if the tower, however unlikely, does collapse. Also mentioned in Section L-2 in the Decommissioning Plan (Appendix L in MVE [2023]), MVE will prioritize the re-use, recycling, or scrap value of decommissioned project components over direct disposal in approved landfill facilities. Many of the metal project components have potential for re-use or scrap value, depending on the market value of the metals at the time of decommissioning. New industrial technologies that recycle turbine blades are currently gaining traction in the marketplace and are expected to increase in utilization over the lifespan of the project. Should these re-use, recycling, or scrap disposal methods become uneconomic by the end of the project lifespan, MVE would seek appropriate industrial disposal sites or landfill locations that are permitted to accept the project components. MVE would not seek to force landfill facilities to accept the disposal of components if the facility objects to their disposal.
7318-2	Linda (No Last Name Provided)	Disposal of spent blade material. There's a problem that was detected in 2019, that the waste for wind turbines at a Nevada scrapyard was at >720,000 tons to dispose of for the next 20 years, and that didn't include the newer, taller, higher capacity versions like this project. I understand that this will be the largest one in the US. Does this project include a scrapyard in the middle of Idaho too? Where do the chemicals in these turbines go when they are scraped and can't be recycled? My guess is that they contaminate the earth on which they were placed.	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
7321-1	Travis Wells	According to a report entitled "Renewable Energy Fact Sheep: Wind Turbines", which was published by the EPA, states that the average lifespan of a windmill is twenty years. Some windmills don't last that long for numerous different reasons. Once windmills complete their lifespan, they are generally disposed of in landfills or just abandoned in the area they were erected. Some companies are working to create recycling opportunities for these windmills, but this is not usually feasible due to the transport and deconstruction costs associated with moving large objects. The windmill frames will be an eyesore. Each windmill also has hydraulic oil reservoirs for oils to be housed for lubrication of the gears. If this oil is not handled properly after decommissioning the windmill, it will become a toxic hazard and negatively affect the land around it.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
7349-1	Robin Herrman	Not to mention the blades, which are made of carbon fiber and fiberglass composites held together with plastics, are not typically recyclable and end up in a landfill. It would be reasonable to assume that pressure to landfill these blades in Idaho would occur.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
7758-1	Dawn Leiske	how much oil will be used annually for maintenance, disposal, (oil, blades, etc.), and where they will bury/dispose of the older and dysfunctional parts as the project matures. In my research there is currently no way of disposing of the blades other than burying them.	See responses to comments 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).

Comment ID	Commenter	Public Comment	Response to Comment
7786-4	Dawn Leiske	The life cycle for renewable electricity like wind and solar runs from design, procurement, and construction, through operations and maintenance, and repair, as well as the life ending decommissioning and disposal, but again, recycling and restoration of the landscaping back to its original pristine condition, is also not in the cards in the wealthy countries that are going green. The U.S. will have more than 720,000 tons of blade material to dispose of over the next 20 years, a figure that doesn't include newer, taller higher-capacity versions.No Pages to Reference in the Lava Ridge Wind Turbine EIS Draft, because it does not address these issues. There is no cumulative action for my topics of concern.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) for project specific decommissioning and disposal methods proposed.
7786-6	Dawn Leiske	How much coal will be used to assemble the blades, steel foundations, etc. and how much oil will be used annually for maintenance, disposal, (oil, blades, etc.), and where they will bury/dispose of the older and dysfunctional parts as the project matures. In my research there is currently no way of disposing of the blades other than burying them.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
8629-4	Cathy Schiers	What plans are in place for disposal of the equipment when it fails, wears out, or is no longer functioning? Will Idaho land also be required for landfills for the giant turbine parts and equipment?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11926-11 (see in Table A-3l, Hazardous Materials and Solid Waste).
8643-4	Steve Woods, Pam Woods	Disposal at the end of the blade lives should be another concern since the new blades have no proven life, only an estimated life. The current practice for disposal is to cut the blades into manageable lengths and bury them in graveyards located in remote places like Wyoming. Could Idaho be next? Furthermore, the "planned" disposal methods have not been proven. This project will utilize approximately 1200 blades, each about 280 feet long. Life expectancy is believed to be 25 years but there is no actual experience to prove that estimate. One solution being considered is to shatter the blades and use the fibers in highway construction. One wonders how many blades can be used this way especially with the push to eliminate crude oil production (the source of asphalt). Additionally, one wonders if minute fiberglass particles along highways will become a respiratory problem for travelers and wildlife. All as-yet unproven issues. A recent article claimed that there were 8,000 blades, each averaging 200 feet in length, that were retired in 2021 (and the number is growing significantly every year).	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) for project specific decommissioning and disposal. Also see response to comment 11926-11 (see in Table A-3l, Hazardous Materials and Solid Waste).
869-3	Michael Crout	You show the end results of what is needed to achieve clean energy with the slight impact on the environment. You don't show the distructivenes and harm to the environment to achieve the end results. Nothing is there about the waist byproducts of maintenance along with its impact on the environment.	See response to comment 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
9186-1	Julie DeWolfe	Failure to include maximum potential volumes of oils, fuels, and lubricants per WT. Failure to include disaster plan for chemical spills. Where is the table and summary listing all hazardous chemicals that will be hauled into the Lava Ridge area, how often they will be hauled in over the lifetime of the project, by what route will they be hauled in, and how they will be stored onsite? WT will need grease for bearings and yaw pinions, hydraulic oil (if applicable), gear oil for drive train gearbox (if applicable), dielectric fluid for transformer, diesel fuel for emergency generator, sulfur hexafluoride for switchgear, propylene glycol for transformer and converter cooling system, ethylene glycol for converter primary cooling, or other products similar for all the moving parts. Wind turbines are filled with toxic chemicals which you do not address adequately or at all for disposal of, storage of, transport of, or use of on public lands. Where is the chemical spill disaster plan for rail, road, and onsite?	See the Hazardous Materials Management Plan portion of the Health and Safety Plan (Appendix F in MVE [2023]).
9864-1	Julee Austin	Disposal of wind turbine blades has been a concern of many for years, with regard to wind energy farms. But a more immediate concern is the shedding of plastics from the turbine blades. The blades are coated with an epoxy resin, which is about 40% Bisphenol-A, a neurotoxin and endocrine disruptor. To minimize the shedding, the blades are coated with another toxic ingredient from the PFAS family of “forever” chemicals. These forever chemicals are biologically cumulative and nondegradable. Microplastic shedding, known as Leading Edge Erosion (LEE) happens only a couple years after installation. LEE is caused by weather, mainly rain and hail. With the impact of rain droplets and hail on the turbine blades that are rotating at a speed of between 30-60 revolutions per minute, the leading edge of the blade starts to wear and erode. The shedding microplastics can spread far and wide with the wind. They can eventually make their way into our drinking water, which will then be contaminated by the toxins. Each turbine can shed about 137 pounds of micro particles per year. Two different studies have been done by the New York State Energy Research and Development Authority regarding utilizing wind energy above Lake Erie. Lake Erie provides drinking water to millions. Considering the shedding of the toxins from the blades, it has been determined that the health of the region’s largest drinking water lake is more important than the goals of the state energy policy. The New York State Department of Public Service has ruled that wind energy facility owners cannot withhold wind turbine blade damage reports from neighbors out of concern for these risks. Since this information is not noted in the DEIS, I am asking you to opt for Alternative A, a no-build option for our Snake River Plain Aquifer Lava Ridge project. https://iowaclimate.org/2022/12/17/clean-energy-scourge-wind-turbine-blades-shedding-tonnes-of-toxic-microplastics/	See response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
9893-2	Michael Chew	[I do not believe this wind farm would be beneficial to the citizens of Idaho for the following reasons:] The turbine blades are typically made of a composite carbon fiberglass material making separating the plastics from the glass fibers to recycle into a workable fiberglass material difficult. The disposal or recycling of the composite fiber turbine blades when units are decommissioned at the end-of-use stage, or when wind farms are upgraded in the	See the Decommissioning Plan (Appendix L in MVE [2023]).

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		process known as repowering is extremely challenging. What guarantees are provided that the old blades from Lava Ridge will not end up being stored on site or placed in Idaho landfills versus being recycled?	

Human Health and Safety

Table A-3m. Human Health and Safety

Comment ID	Commenter	Public Comment	Response to Comment
1042-18	WildLands Defense	The EIS greatly downplays the serious human health risks of exposure and people, pets and wildlife to gargantuan turbines, transmission lines and other project elements.	EIS Chapter 3 (Affected Environment and Impacts) discloses the potential for human health impacts in Sections 3.2 (Air Quality), 3.4 (Climate and Greenhouse Gases), 3.6.1 (Environmental Justice Communities), 3.14 (Transportation), 3.16 (Visual Resources), and 3.17 (Water and Wetland Resources). Numerous human health issues are also addressed in EIS Appendix 3 (Issues Analyzed in Brief), such as AIB-12: How would the project contribute to EMFs and corona exposures to workers and the public? Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. The 500-kV transmission line corridors would be 1.6 miles from the closest residence. MVE would implement appropriate industry best-practice setback distances to surrounding residences and occupied buildings (typically defined by a fixed distance [e.g., 2 miles] or a function of the dimension of the selected wind turbine [e.g., 1.1 times the maximum turbine tip height]), as stipulated in applicant-committed measure 25.
10426-4	Casey Stevenson	[These are my concerns which have not been addressed by the EIS which will impact thousands of people, and need to be reevaluated. Here are my concerns:] Wind turbines can also produce electromagnetic interference that can affect certain farming equipment such as weather radars and communication systems (our GPS for our tractors and our radio pivot controls).	Interference with communication systems is discussed in Section 3.8 (Land Use and Realty). The EIS provides information about communication system interference: “Comsearch (2020) recommended not locating any turbines within 254 feet of land mobile fixed-base stations to avoid potential impacts to the communications services provided by these stations. This setback distance is based on FCC interference emissions from electrical devices in the land mobile frequency bands.” Additionally, applicant-committed measures 27 and 28 state that MVE would design the project to minimize interference and work with system users to resolve issues: “Measures to reduce interference may include the use of Comsearch’s recommended setbacks from land mobile fixed-base stations (254 feet) or other design modifications such as attaching communications equipment to project infrastructure or to existing communications structures in the analysis area. Signal studies were provided in April 2021 to all communication site authorization holders who had submitted responses to the BLM following notification provided in July 2020. Prior to final design and siting of project infrastructure, MVE would complete a line-of-sight interference study to further identify communication pathways potentially blocked by the project’s proposed infrastructure and to determine where potential impacts to existing communication towers can either be avoided through micro-siting of infrastructure or mitigated. Coordination with local communication providers and operators is considered ongoing.” Also see response to comment 11978-67 (see in. Table A-3cc, Mitigation – EIS Appendix 4).
10427-1	Jess Bartlett	What about the detrimental health effects they've been shown to have on humans?	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
10477-1	Brenda Ford	once the windmills are up and running there are people who live around there and they will have to deal with the noise, oil leaks, and potential fires caused by the windmills.	Fire and fuels management is discussed in EIS Section 3.7 (Fire and Fuels Management). Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. Noise impacts are discussed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) and cover both the construction and operation phases of the project. Section 3.6.1.2.2 (Alternative B [Proposed Action]) provides details on noise impacts to people and communities. Noise issues are also discussed in Section 3.9.2 (Physiological Effects to Livestock). Applicant-committed measures to address noise impacts can be found in Table App4-2i in EIS Appendix 4 (Mitigation). Section 3.12 (Recreation) discusses noise impacts on recreational uses. Finally, Section 3.18 (Wildlife) addresses noise impacts, including operational noise, on wildlife. See also response to comment 12228-1 (see in Table A-3l, Hazardous Materials and Solid Waste).
1054-2	Jeff Juker	What are the plans both environmental and electrical concerning public safety?	See responses to comments 1042-18 (see in Table A-3m, Human Health and Safety) and 10426-4 (see in Table A-3m, Human Health and Safety). The EIS also addresses public safety in Section 3.8 (Land Use and Realty). Applicant-committed measures 42 and 43 would reduce the duration of public access restrictions to the extent practicable during construction while also ensuring public safety (see Table App4-2e in EIS Appendix 4 [Mitigation]). During operation, the project would not physically preclude any other permitted uses (e.g., grazing and recreation) from the siting corridors, except where permanent infrastructure is sited (2,374 acres).

Comment ID	Commenter	Public Comment	Response to Comment
			During operation, the ROW would be non-exclusive, and any new applications for ROWs in the siting corridors would be analyzed for compatibility with the project infrastructure on a case-by-case basis. The safety of project structures is discussed in Section 4.1 (Operation and Facility Maintenance Needs) of MVE (2023).
1074-1	Sue Page	I am opposed to Lava Ridge Wind Project because Of the health Hazards the Hidden Human Tragedy Caused by Incessant Wind Turbine Noise wind-turbines-near-house Helen Schwiesow Parker, PhD, is a Licensed Clinical Psychologist and a Past Clinical Supervisory Faculty member at the University of Virginia Medical School. Her career includes practical experience in the fields of autism, sensory perception, memory and learning, attention deficit and anxiety disorders, including panic disorder and PTSD. In this well-crafted piece, Helen details the misery and suffering which is caused by incessant turbine generated low-frequency noise and infrasound and maliciously covered up by the wind industry and its political enablers. [text of article included below in comment]	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety). Also, see AIB-32 in EIS Appendix 3 (Issues Analyzed in Brief): How would vibrations from project wind turbines affect nearby structures? The calculated amplitude of vibrations from the turbines at the nearest residential structure is less than the threshold for human perception per guidelines based on international standards for allowable vibration levels.
11204-24	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Separate-and-apart from the foregoing, while reviewing information relating to previously expressed concerns about the potential physiological effects of the proposed Project to their livestock, Permittees discovered additional information that created new concerns that the proposed Project has the potential to cause physiological distress to the Permittees, their families, and their employees. Concerns regarding potential impacts of the proposed Project to human health are particularly relevant to the Permittees and their families and employees because they will be required to spend significant periods of time managing and moving their livestock within and adjacent to the proposed siting corridors within the Star Lake Allotment particularly during the construction phase and during the operational phase (30-year period) of the Project. Wind-energy projects have been reported to create negative impacts on human health and well-being, mainly by noise, shadow flicker, and visual impacts. The health implications of visual impacts are often underestimated. The World Health Organization reported that a “bad view” out of a window can increase the risk for depression by 40%.11 The same study also reported that noise disturbance when awake can increase depression by 40% while sleep disturbance from noise can increase depression risk by 100%. Other scientific studies indicate a strong correlation between sunlight deficiency and depression, or the risk thereof. Therefore, those who are exposed to the sound and visual disturbances experienced when living close to wind turbines seem to be at an elevated risk of suffering from depression no matter what they do. If they allow the shadow flicker caused by the wind turbines to encroach through windows, the “bad view” and 11 World Health Organization, Large analysis and review of European housing and health status (LARES) Preliminary overview, 2007. disorienting flickers coupled with the sound pollution raises their risk of depression. On the other hand, if they frequently draw light-darkening curtains to keep the shadow flicker under control, they are also at higher risk for depression than they otherwise would be in normal living situations. Wind turbines create visual burdens along with noise pollution12 which can cause annoyance, stress, and disturbance to sleep.13 14 15 16 17 Thus, the visual and noise impacts of wind turbines, particularly when combined, can result in adverse human health effects. See Visual Health Effects and Wind Turbines at www.aboutgenerators.com/visual-health-effects-and-wind-turbines (last checked 4/11/2023 @ 9:57 A.M). When wind turbine blades rotate, they cause an effect commonly known as shadow flicker, particularly when backlit by the sun when it is low on the horizon. Shadow flicker has been reported to be bright enough to pass through closed eyelids,18 and has the potential to induce photosensitive epileptic seizures, although this risk is low with proper planning and mitigation.19 Planning to mitigate epilepsy triggers should ensure that shadow flicker from individual turbines or from multiple adjacent turbines does not exceed a flash frequency of three per second18. See Visual Health Effects and Wind Turbines at www.aboutgenerators.com/visual-health-effects-and-wind-turbines (last checked 4/11/2023 @ 9:58 A.M). Annoyance and/or stress have consistently been found to be the most common adverse human health effects correlated with shadow flicker from wind turbines.20 21 22 Wind turbine noise is easily heard, and turbines are visually prominent objects whose spinning motion attracts the eye. The combined auditory and visual effects and negative aesthetic response can multiply the experience of annoyance and lead to stress- related symptoms due to prolonged physiological stimulation which is resistant to psycho-physiological recovery.23 See Visual Health Effects and Wind Turbines at www.aboutgenerators.com/visual-health-effects- and-wind-turbines (last checked 4/11/2023 @ 10:00 A.M.). Shadow flicker can be an issue both indoors and outdoors, particularly when the sun is low on the horizon, and must be modeled for human exposure risks in locations other than nearby homes. Shadow flicker is also a travel safety concern because it can be a distraction while driving vehicles. In the northern hemisphere, locations East-NE or West-NW from wind turbines are most vulnerable to adverse effects from shadow flicker.24 See Visual Health Effects and Wind Turbines at www.aboutgenerators.com/visual-health-effects-and- wind-turbines (last checked 4/11/2023 @ 10:03 A.M.). The DEIS appears to have confined its shadow flicker modeling to residences and other “receptor” building sites that are located close to the proposed Project’s siting corridors. The DEIS needs to consider and assess shadow flicker modeling in other outdoor locations, particularly along improved roads subject to moderate to high vehicle speeds which may experience Project-related shadow flicker that can distract drivers. Recommended setbacks to avoid shadow flicker conflicts are 10 rotational diameters which would translate to approximately 4,590 feet for the 3-MW turbines and 5,600 feet for the 6-MW wind turbines analyzed for the proposed Project. Protection from excessive shadow flicker exposure to avoid adverse human health effects must be engineered into the project-design during the planning stages of any wind turbine facility. Shadow flicker modeling in the planning stage should include: calculations based on the actual location of the wind turbines; exposure calculations on the entire neighboring properties and not just “receptor” locations; calculations for both sun and moon induced flicker using conservative assumptions to ensure maximum	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety). Also see AIB-32 in EIS Appendix 3 (Issues Analyzed in Brief): How would vibrations from project wind turbines affect nearby structures? The calculated amplitude of vibrations from the turbines at the nearest residential structure is less than the threshold for human perception per guidelines based on international standards for allowable vibration levels. Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. Noise impacts are discussed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) and cover both construction periods and operation of the project. Section 3.6.1.2.2 (Alternative B [Proposed Action]) provides details on noise impacts to people and communities. Noise issues are also discussed in Section 3.9.2 (Physiological Effects to Livestock). Applicant-committed measures to address noise impacts can be found in Table App4-2i in EIS Appendix 4 (Mitigation). Impacts from shadow flicker and potential mitigation are described in Section 3.16.3 (Shadow Flicker).

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		protection against adverse human health effects and safety risks; and, protection against photosensitive epilepsy by ensuring the flash frequency of shadows cast by individual turbines or a combination of multiple turbines does not exceed three flashes per second. See Visual Health Effects and Wind Turbines at www.aboutgenerators.com/visual-health-effects-and-wind-turbines (last checked 4/11/2023 @ 10:07 A.M.). The DEIS and its associated Appendices fail to comply with the shadow flicker modeling recommendations disclosed above because: they do not base the modeling calculations on actual wind turbine locations (which will not be determined until the plan is finalized); they appear to base the calculations primarily or exclusively on “receptor” locations which are residences or other buildings that would be located near the Project siting corridors and fail to model impacts on all neighboring properties including outdoor locations; they do not appear to include any modeling of shadow flicker induced by the moon; and, they do not even mention epilepsy whatsoever. The DEIS needs to be amended to correct these deficiencies. A 2008 article published in Epilepsia (49(6), pgs. 1095-1098) titled “Wind turbines, flicker, and photosensitive epilepsy: characterizing the flashing that may precipitate seizures and optimizing guidelines to prevent them” reported that “seizure risk does not decrease significantly until the distance exceeds 100 times the hub height” and concluded that “flash frequency is therefore the critical factor and should be kept to a 23 Pedersen Eja, Human Response To Wind Turbine Noise: Perception, Annoyance And Moderating Factors , May 23, 2007. 24 Verkuijlen E, Westra CA. (1984) Shadow hindrance by wind turbines. Proceedings of the European wind Energy Conference. October 1984, Hamburg, Germany. maximum of three per second, i.e., sixty revolutions per minute for a three-bladed turbine.” The article also concluded “the shadows cast by one turbine on another should not be viewable by the public if the cumulative flash rate exceeds three per second” and that to reduce epilepsy-related health concerns wind turbine blades “should not be reflective.” While articles regarding potential health effects from the shadow flicker and noise (both audible and infrasound) created by wind turbines have generally concluded that annoyance, stress, and sleep disruption are the most significant health effects to humans, the trend in concern levels reported within these articles is not reassuring. Older articles tended to downplay the severity of these human health concerns more than do the most recent articles. Thus, it seems that the more we study the issue, the more the scientific community finds that there is merit behind the health concerns regarding annoyance and sleep disturbance. For example, conclusions from synthesis articles regarding scientific investigation of the issue taken in chronological order are summarized below: March 5, 2013; Environmental Impacts of Wind Power by the Union of Concerned Scientists. “Public health and community – Some people living close to wind facilities have complained about sound and vibration issues, but industry and government-sponsored studies in Canada and Australia have found that these issues do not adversely impact public health.” June 19, 2014; Wind turbines and human health a review article in Frontiers in Human Health. “The available scientific evidence suggests that EMF, shadow flicker, low-frequency noise, and infrasound from wind turbines are not likely to affect human health; some studies have found that audible noise from wind turbines can be annoying to some. Annoyance may be associated with some self-reported health effects (e.g., sleep disturbance) especially at sound pressure levels >40 dB(A). … Based on the findings and scientific merit of the available studies, the weight of evidence suggests that when sited properly, wind turbines are not related to adverse health.” December 4, 2014; Health effects related to wind turbine noise exposure: a systematic review in PLoS One - doi: 10.1371/journal.pone.0114183. “Exposure to wind turbines does seem to increase the risk of annoyance and self-reported sleep disturbance in a dose-response relationship. There appears, though, to be a tolerable level of around LAeq of 35 dB. Of the many other claimed health effects of wind turbine noise exposure reported in the literature, however, no conclusive evidence could be found. January 23, 2019; The influence of wind turbine visibility on the health of local residents: a systematic review by Alice Freiberg, Christiane Schefter, Janice Hegewald, and Andreas Seidler. “Results: The pooled prevalence of high annoyance due to altered views and shadow flicker was 6% each. The results of other health effects were inconsistent, with some indications showing that direct wind turbine visibility increases sleep disturbance. Annoyance by direct visibility, shadow flicker, and blinking lights was significantly associated with an increased risk for sleep disorders. One study indicated reactions to visual wind turbine features may be influenced by acoustical exposures. Conclusions: Direct and indirect wind turbine visibility may affect residents' health, and reactions may differ in combination with noise.” Note that in 2013 it was flatly concluded that “these issues do not adversely impact public health.” In mid-2014 it was reported that “scientific evidence suggests” that phenomena generated by wind turbines “are not likely to affect human health” while “audible noise from wind turbines can be annoying to some” which can induce certain “self-reported health effects (e.g., sleep disturbance) especially at sound pressure levels >40 dB(A).” In late-2014 it was concluded that wind turbine exposure “does seem to increase the risk of annoyance and self-reported sleep disturbance in a dose-response relationship” with a toleration “level of around” 35 dB. In contrast, by 2019 it was concluded that there was a “prevalence of high annoyance due to altered views and shadow flicker” (6% each) “with some indications showing that direct wind turbine visibility increases sleep disturbance” while visual annoyance paired with “shadow flicker, and blinking lights was significantly associated with an increased risk for sleep disorders25.” As seen above, the more recent synthesis articles conclude that there are negative health effects with an increasing degree of certainty, and report that the thresholds of toleration are progressively lower. In other words, as time goes on the scientific viewpoint is increasingly recognizing the legitimacy of health concerns regarding long-term annoyance and sleep disruption impacts and is finding that what were initially considered to be tolerable impact levels may have been set too high. The DEIS needs to consider and assess that the science regarding long-term annoyance and sleep disruption impacts associated with wind turbines is growing and that the more we study these phenomena, the more we discover regarding their prevalence and the more we understand about how they can be mitigated. While reviewing information relating to previously expressed concerns about the potential physiological effects of the proposed Project to their livestock, the Permittees discovered additional information	

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		that created new concerns that the proposed Project has the potential to cause health and safety risks due to the danger of falling ice. Given the extremely high tip-speed of wind turbine blades, there is the potential for ice to be hurled across an impact zone which may extend far beyond the vertical footprint of the wind turbine rotor itself. The DEIS fails to disclose or analyze this potential risk whatsoever. The DEIS needs to consider and assess the risks to health and safety that would be created by the proposed Project due to the danger of falling / hurling ice, including: associated risks to the Permittees' livestock during their annual scheduled grazing seasons within the Star Lake Allotment (4/16 – 12/31); associated risks to wildlife (sage-grouse and other birds, big game, small game, other mammals, amphibians, and reptiles); and, humans (particularly within the wind turbine siting corridors and associated roadways).	
11238-1	Angela Mooney	30 years of the vibrations from these towers, taller and larger than anything every built for this purpose, known to vibrate and sicken people and livestock (crushing them from the inside out), for 30 years, will certainly send shocks through the ground and whatever firmament remains after the construction period will surely compress and collapse over the decades. This project is creating a hellscape that will affect the food chain for years to come. And it will be irreversible. The vibrations from wind mills are known to change the brains and blood flow in humans. There are published studies. There are lawsuits. These are easily researched, public knowledge, which makes this whole project a known danger. That is why there is a hold harmless clause in the EIS. If you don't stop this, the litigation may go on for decades, but we'll still be ruined in this valley, from the inside of our bodies to the backbone of the economy that FEEDS MILLIONS.	See AIB-32 in EIS Appendix 3 (Issues Analyzed in Brief): How would vibrations from project wind turbines affect nearby structures? The calculated amplitude of vibrations from the turbines at the nearest residential structure is less than the threshold for human perception per guidelines based on international standards for allowable vibration levels.
11360-3	Sergio Arroyo Jr.	" Additionally, blasting during construction would generally be limited to Monday through Friday during daytime hours (7:00 a.m.-7:00 p.m.) within 3,000 feet of sensitive receptors." DEIS V 1, 3-199 Have they taken into consideration that agricultural work demands day and night shifts? The plan to blast 5 days a week, 7 am to 7 pm, will interrupt the day sleepers for 525 days. This interruption will devastate the health of day sleepers who can't sleep soundly enough to prepare for the night shift, and may cause a dearth of workers willing to tolerate the situation. In turn this could harm farming and dairy operations in the area surrounding the blasting projects.	The EIS describes the applicant-committed measures regarding blasting in Table App4-2i in EIS Appendix 4 (Mitigation). Measures are intended to minimize impacts during evening hours when the majority of the community would be sleeping.
11372-4	Jamie Kohtz	Lastly, there are details on the effects to wildlife. One species not mentioned is the rattlesnake. Every farmer in Hunt, and every homeowner has had rattlesnakes. Whenever a home is built, a domestic well drilled, bulldozer work, or a fire, rattlesnakes move close to our home for that summer. These rattlesnakes have killed livestock and dogs, and we've had close calls with rattlesnakes and people. Blasting of this magnitude will disturb the rattlesnakes, and they will move closer to the populated areas.	As stated in EIS Section 3.18.1.2.2 (Alternative B [Proposed Action]), "Blasting would also occur approximately twice per day during the 2-year construction period. Although individual blasts may disturb or displace wildlife, they would be unlikely to lead to long-term effects on wildlife movement because blasting would not occur repeatedly in the same area over a long period of time."
11491-22	Dean Dimond, Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: [...] 30. Full disclosure of data on human health impacts from wind projects across the USA, [...]	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
11491-29	Dean Dimond, Jennie Bateman	3. no human safety analysis,	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
11535-98	Steven Andersen	Ice Shedding There DEIS fails to address the known phenomenon of "ice shedding" caused when ice is thrown vertically and horizontally from blades to the ground below. An in-depth study into ice shedding and ice throw was conducted by GE Energy and noted that rotating turbine blades may propel ice fragments several hundred meters, causing damage to structures, vehicles, personnel and the general public unless adequate measures are put in place for protection.309 A risk assessment should have been conducted that accounted for the projected the hub height and rotor diameter, turbine dimensions, rotational speed and site locations (which are unknown).	AIB-14 was added to EIS Appendix 3 (Issues Analyzed in Brief): Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public?
11554-7	Raul Labrador; Idaho Attorney General's Office	[The draft EIS Ignores Idaho's Sovereign Interest in its People.] Fifth, a growing body of scientific literature shows that living close to large wind turbines can damage people's mental and physical health.7 The agency pays this important environmental factor no heed.	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
11554-10	Raul Labrador; Idaho Attorney General's Office	Eighth, the Project will have a generation capacity of 1,000 megawatts or more. DEIS, Introduction. This could tax the energy grid and threaten the stability and predictability of Idaho's energy supply, but the draft EIS doesn't consider this, or even mention it.	EIS Section 2.4 (Alternative B [Proposed Action]) describes the substations and transmission lines for the project. These are also discussed in Section 1.3.6 (Substations and Transmission Lines) in MVE (2023).
11566-1	Clare Josaitis	It does not appear that the DEIS analyzes any of the well-documented adverse health effects that are known to occur to the human population from wind turbines. Given the unprecedented height of the proposed turbines and the proximity of the wind turbines to nearby communities and field workers, farmers, ranchers, etc., this concern needs to be analyzed. There are global reports of adverse effects from wind turbines on people. Complaints include annoyance, reduced quality of life, sleeplessness, and headaches. (Minnesota Department of Health [website] Public health impacts of wind turbines. St Paul, MN: Minnesota Department of Health; 2009. www.health.state.mn.us/divs/eh/hazardous/topics/windturbines.pdf.) Noise-induced annoyance is acknowledged to be an adverse health effect. (Pedersen E, Persson Waye K. Wind turbine noise, annoyance and self-reported health and well-being in different living environments. Occup Environ Med. 2007;64(7):480-6). The Canadian Family Physician which is a peer-reviewed medical journal states that, "Canadian family physicians can expect to see increasing numbers of rural patients reporting adverse effects from exposure to industrial wind turbines (IWTs). People who live or work in close proximity to IWTs have experienced symptoms that include decreased quality of life, annoyance, stress, sleep disturbance, headache, anxiety, depression, and cognitive dysfunction.	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety). Also, see AIB-32 in EIS Appendix 3 (Issues Analyzed in Brief): How would vibrations from project wind turbines affect nearby structures? The calculated amplitude of vibrations from the turbines at the nearest residential structure is less than the threshold for human perception per guidelines based on international standards for allowable vibration levels. Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. Noise impacts are discussed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) and cover both construction periods and operation of the project. Section 3.6.1.2.2 (Alternative B [Proposed Action]) provides details on noise impacts to people and communities. Noise issues are also discussed in Section 3.9.2 (Physiological Effects to Livestock). Applicant-committed measures to address noise impacts can be found in Table App4-2i in EIS Appendix 4 (Mitigation). Impacts from shadow flicker and potential mitigation are described in Section 3.16.3 (Shadow Flicker).

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		Some have also felt anger, grief, or a sense of injustice. Suggested causes of symptoms include a combination of wind turbine noise, infrasound, dirty electricity, ground current, and shadow flicker.1 Family physicians should be aware that patients reporting adverse effects from IWTs might experience symptoms that are intense and pervasive and might feel further victimized by a lack of caregiver understanding." (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3653647/#b30-0590473). Researchers found "people that live near wind turbines have reported adverse health effects such as (but not limited to) ringing in ears, headaches, lack of concentration, vertigo, and sleep disruption that they attribute to the wind turbines." https://www.frontiersin.org/articles/10.3389/fpubh.2014.00063/full NEPA requires that federal agencies must analyze the direct and indirect effects on the human environment, including effects on health. (SS 1508.1(g)(1)-(4). A decision has not yet been made, and folks in the Magic Valley has been expressing their disdain, anxiety, opposition, and depression about this proposed project. I respectfully request that the BLM thoroughly consider and explore the potential effects of the proposed wind turbines on the residents of the communities surrounding the project area.	
11608-2	Alison Yasuoka	There are many research-based articles about the negative impacts of wind turbines. Here is one article from the NIH: Jeffery RD, Krogh C, Horner B. Adverse health effects of industrial wind turbines. Can Fam Physician. 2013 May;59(5):473-5. PMID: 23673580; PMCID: PMC3653647. LINK: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3653647/ (At the end of the article, additional references are cited in support of its claims.)	See response to comment 11566-1 (see in Table A-3m, Human Health and Safety).
11640-1	Amber Madsen	Please examine (From the Lava Ridge EIS) Pg 82 3.2 Air Quality “Blasting emissions were estimated assuming two blasts per day for 525 days assuming 120 pounds of ammonium nitrate-fuel oil per blast using AP-42 Explosive Detonation factors.” (1050 days x 120 lbs. = 126,000 lbs. of explosives). This is not acceptable! I have worked with many people who have lived with long term health issues, and ultimately died from these issues, that could have been prevented if such facts were not ignored. There would be no way to contain the particulate matter in the air that would cause irreversible damage to the health of many.	The EIS discusses air quality in Section 3.2 (Air Quality) of Chapter 3 (Affected Environment and Impacts). A detailed summary of emissions analysis is available in the project air quality technical report (SWCA 2022). Project-specific measures for air quality are shown in Table App4-4, a through i.
11747-2	Eric Hess	1. We have personal experience in both an urban as well as a rural setting, with the introduction of “smart” electrical meters, that the electromagnetic and radio frequencies were so painfully disruptive, that we were forced to move from one of the locations. (We moved from the other location for different reasons.) We understand that EMF’s and radio frequencies are generated by the infrastructure of the turbines. 2. We noticed that insects in the urban location and various groups of insects, birds, deer etc. in the rural setting, not to mention people, were affected when the “smart” meters were turned on. 3. We have encountered other people who have similar painful experiences with EMF’s and radio frequencies.	See AIB-12 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project contribute to EMFs and corona exposures to workers and the public?
11855-5	Mark Doerr	The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: [...] Impact to aircraft and people on the ground by the shedding of ice from spinning blades on the towers. How far can ice be expected to be thrown vertically and horizontally from a 220 foot blade moving near 600 miles per hour at the tip.	AIB-14 was added to EIS Appendix 3 (Issues Analyzed in Brief): Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public?
11869-10	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	Most importantly, Idaho has a critical sovereign interest in protecting “the health and well-being—both physical and economic—of its residents.” Alfred L. Snapp & Son, Inc. v. Puerto Rico, 458 U.S. 592, 607 (1982). The Project harms the physical and economic well-being of Idahoans in several ways. [...] Second, the Project will rapidly increase the number of roads and traffic in the Magic Valley Region. The Project will require the construction of more than 500 new roads. This influx in traffic will raise the risk of traffic-related injuries and fatalities and place more strain on existing roads and bridges.	See AIB-13 in EIS Appendix 3 (Issues Analyzed in Brief): Would project activities change the potential for risks of accidents or injuries to public health and safety? Although the project would construct up to 486 miles of new roads, most of the roads would be in the siting corridors where fewer people would be driving and roads would be designed to be driven at slower speeds. As per applicant-committed measure 33, project personnel during all project phases would be required to drive 25 mph or less on non-[posted] public project roads. Also, BLM-required mitigation measure N would require that MVE establish speed limits on BLM roads to reduce vehicle/wildlife collisions or design roads to be driven at slower speeds.
11871-118	WildLands Defense	Wind turbines also emit a low frequency noise that is out of most people's hearing range, including very low frequency noise (<20 Hz) that some refer to as “infrasound” or “infrasound and low frequency noise” (IFLN). It is still unclear whether IFLN has any influence on human health or wellbeing in situations where turbines are too distant for audible noise to be detected”.	Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. Noise impacts are discussed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) and cover both construction periods and operation of the project. Section 3.6.1.2.2 (Alternative B [Proposed Action]) provides details on noise impacts to people and communities. Noise issues are also discussed in Section 3.9.2 (Physiological Effects to Livestock). Applicant-committed measures to address noise impacts can be found in Table App4-2i in EIS Appendix 4.
11873-10	Mary Schwartz, Frank Schwartz	10. The DEIS, Appendix 3, item AIB-12 provides a very limited acknowledgement of potential environmental impacts from the electromagnetic fields (emf) associated with the power lines. As with humans, the electromagnetic radiation has a detrimental effect on wildlife, insects (like pollinators) and plants that are resident (with continuous exposure) near these power lines and that impact has not been acknowledged or analyzed in this DEIS. The density of these power lines in the project area creates a condition unlike that of a single power line in an area. If these effects have not been studied, why does the project assume it is acceptable? The DEIS is incomplete without addressing the potential significance of this impact.	See AIB-12 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project contribute to EMFs and corona exposures to workers and the public?
11899-2	Diana Nielson>	The Magic Valley doesn’t have a burn or trauma center. Life Flight and other air emergency response will have limited access to the areas. To travel over the dirt roads will be very time consuming for ground ambulance	The Health and Safety Plan (Appendix F in MVE [2023]) establishes MVE’s commitment to preparing an Emergency Action Plan that will be a term and condition of the ROW grant if an authorization is granted. OSHA

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		emergency response. If there is a catastrophic accident how many people will be able to respond with emergency medical techniques? Who will be in charge of making sure each employee has a form of accident or health insurance so Lava Ridge will not be economical burden to health services that are already in short supply ? Many states have HMO healthcare and will not pay unless the patient goes to a preferred provider. Will Magic Valley Energy/ LS Power have contracts with local hospitals? Subcontractors will not always be covered by workers comp.	establishes and enforces requirements related to employee medical coverage, which is outside the scope of the draft EIS and the BLM's delegate authority. See the following AIBs in EIS Appendix 3 (Issues Analyzed in Brief): AIB-10: Would project activities change the potential for risks of accidents or injuries to worker health and safety? AIB-11: How would the project impact emergency responders that serve the project vicinity? AIB-13: Would project activities change the potential for risks of accidents or injuries to public health and safety?
11915-3	Kim Peyman	I would be remiss if I did not mention the obliteration of the sky caused by the almost constant brown cloud of smog (air pollution), traffic noise and the light pollution at night! You can actually taste the pollution in the air over Denver. Here I am free of the city's oppressive pollution; the sky is actually blue and I am grateful! Regretfully, the deck on the front of my home faces directly toward this proposed wind farm site. If this project gets approved, my southeast view will turn into a strange, new cityscape complete with 700-foot-tall skyscraper windmills, and their light and noise pollution. I left Denver because of the pollution. I think about the extreme toxicity of the lithium-ion batteries used for these wind turbines. What are the potential consequences if someone uses them for target practice? We see objects all over in the desert that have been used for this purpose. These batteries contain toxic metals such as cobalt, nickel and manganese that can contaminate water supplies and ecosystems if not handled properly.	The EIS discusses air quality in Section 3.2 (Air Quality) of Chapter 3 (Affected Environment and Impacts). A detailed summary of emissions analysis is available in the project air quality technical report (SWCA 2022). Project-specific measures for air quality are shown in Table App4-4, a through i. See AIB-45 in EIS Appendix 3 (Issues Analyzed in Brief): How would hazardous materials and wastes generated by the project be managed? Would they exceed capacities of approved disposal facilities? See AIB-46 in EIS Appendix 3 (Issues Analyzed in Brief): How would solid wastes generated by the project (packaging materials and employee-generated wastes) be managed? Would they exceed capacities of approved disposal facilities?
11962-3	Cassie Christensen, Tyler Christensen	Stray Voltage If there is one topic here, I have personal experience with, it is this one. I watched my parents give up everything they had to fight a battle against a giant. Years of toiling just dwindled away as cows would drop dead or stop producing for what was an unknown reason at that time. Unfortunately, my 5 siblings and I also lost precious time with our parents as they were away fighting for everything they had worked for their entire lives. When the term stray voltage appears, people just look the other way because it's not a topic that has had a lot of light spread on it. Stray voltage is a prominent issue in the area and it mainly affects dairies and farming operations that draw in the stray electricity with their stations and other grounding objects. Every time a cow goes to eat, drink or get milk they are getting shocked. This is a huge stressor and it causes an array of issues. Cattle die for no reason, milk production decreases, cancer develops, birth rates and pregnancy rates decrease, practically everything you can think of to make a dairyman broke. However, 20 years after Vierstra vs Idaho Power, few things have been done to improve this and they are not the only ones affected. If it is happening to cattle in the area, what is it doing to the people? How will we be affected by transporting more energy through power lines? The substation has to be grounded, so there is no way to stop some power from leaking. The term "stray voltage" or "stray electricity" doesn't even show up when you search the DEIS. What research has been done in other areas where operations this large have been put in place? 7Or even operations half this size, since this will be the largest operation in the United States according to NS Energy?	See EIS Section 3.9.2 (Physiological Effects to Livestock).
11962-9	Cassie Christensen, Tyler Christensen	Our property is 1 mile from the proposed site and if I was unfamiliar with my area, I would consider driving with such a large load, in the condition of our roads extremely hazardous. There are times while approaching HWY 25 I feel unable to stop a truck and trailer going at a low speed because of the pot holes and damage to the road and how the road slopes down to the HWY.	The EIS discusses road impacts and traffic in Section 3.14 (Transportation). Applicant-committed measures 31–43 (see EIS Appendix 4 [Mitigation], Table App4-2e) would be implemented and would reduce potential impacts to traffic patterns in the analysis area during construction and operation by limiting use of roads outside work areas, through the use of traffic control measures, by repairing and restoring roads postconstruction, and by coordinating any changes to traffic patterns with local authorities and rightsholders within the siting corridors. See also the following AIBs in EIS Appendix 3 (Issues Analyzed in Brief): AIB-37: How would the project's operation traffic impact the condition and maintenance of major public roads? AIB-38: How would the weight/load characteristics of project truck traffic impact the existing major public roads? AIB-39: How would project road use on BLM lands affect maintenance of the roads, including winter maintenance?
12232-4	Juli Miller	First, as a healthcare consultant, I am aware of the serious detrimental effects on the health and wellbeing of people who are exposed to the energy wavelengths and emissions which will be emitted from the project.	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
12275-1	Jerry Holton	I was told that being around the windmills can affect the heart. I did research on this and found articles I will be attaching to this. I have spent 44 years in the area of the proposed project, and it really bothers me that I will not be able to share this area with my family due to the affects it has on me. It is a feeling I do not like and don't understand. This is just what happened to me and my own personal experience in 3 areas I have been. Quite disturbing what these windmills can do to someone physically. I have never had those chest problems and I have hiked, climbed, packed weight on a pack frame, I do construction for a living, climb up and down ladders and have never had my heart/chest feel like this. It was quite frightening. But here are the links to the articles I am sharing. They all state there are issues from windmills and to each person is different in what happens. Not every persons body is the same.	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
12307-13	Dean Dimond	no human safety analysis,	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
12307-32	Dean Dimond	Need detailed county law enforcement, search and rescue personnel review and analysis of viability	See AIB-11 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project impact emergency responders that serve the project vicinity? The EIS also discusses public use and safety in Section 3.8 (Land Use and Realty), Section 3.6 (Environmental Justice and Socioeconomics), and Section 3.12 (Recreation). Additionally, emergency services are discussed in Section 3.7 (Fire and Fuels Management).

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12443-2	Diana Nielson	I am having difficulty finding in the draft EIS who will be liable for the compensation ofrom loss of life from electrical faults or the stray electrical current resulting in Step Potential or Touch Potential electrocution. This Step Touch Potential of electrical accidents will be increased when the soils are very dry because the grounding rods don't work effectively or when the weather increases the soil moisture in excess with or without water pooling. The grounding of the wind turbines and the transmission towers is vital to all life forms. The groundings need to maintain less than 1 ohm of resistance with enough paths to the earth to dissipate faults. Who and how will these grounds be tested? How will the wind turbine generators be monitored for faults to prevent stray electricity from charging the ground? Wind Turbine generators have no fuse to break the energy current or its production. The loss of life for humans, reptiles, big game and livestock could be disastrous.	MVE would conduct an electrical grounding study to determine turbine step-and-touch potentials during fault conditions. Factors such as the grounding system design, soil resistivity, and ground fault current are used in the computation and then compared to permissible touch-and-step voltages for the design (permissible levels defined by IEEE Std. 80-2013). The maximum touch-and-step voltages would be designed to be less than the permissible touch-and-step voltages. The grounding study would also calculate a ground grid resistance for the turbines. After the ground grid is installed, the resistance would be measured by a qualified contractor via an industry standard method (e.g., fall of potential), which uses a ground resistance tester). Wind turbines are controlled by management systems that monitor a variety of performance characteristics in real time, including electrical fault conditions. Wind turbines are equipped to safely trip off-line if needed during a detected fault. MVE (2023) Section 2.10 (Electrical) states that "Counterpoise Installation: Part of standard construction practices prior to wire installation will involve measuring the resistance of tower footings. If the resistance to remote earth for each transmission tower is greater than 10 ohms, counterpoise (grounds) would be installed to lower the resistance to 10 ohms or less." See AIB-12 and EIS Section 3.9.2 (Physiological Effects to Livestock) regarding the potential for impacts from electromagnetic exposure to humans and animals, including livestock.
12474-1	Joan Hurlock	Wind turbine blades are composed of balsa wood, fiberglass, and epoxy, with Bisphenol-A (BPA) comprising approximately 40% of the epoxy. BPAs are frequently banned substances due to their link to almost 80 diseases, including testicular cancer, and reproductive disorders. BPAs are also known as endocrine disrupters and neurotoxins. Studies have shown that wind turbine blades experience "leading edge erosion", which is the shedding of the epoxy coating, due to wind, rain and hail. One turbine will shed about 136 pounds of BPAs annually. It has been estimated that a 400 turbine project will shed almost 25 TONS of these toxic chemicals per year. Here is a link to the article where information about microplastic shedding can be found: https://breakingviewsnz.blogspot.com/2023/02/ian-bradford-more-problems-with-wind.html <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fbreakingviewsnz.blogspot.com%2F2023%2F02%2Fian-bradford-more- problems-with-wind.html&data=05%7C01%7Cblm_id_lavaridge%40blm.gov%7C79b09c991b4a4fa8490b08db3f7fa951%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638173589762469241%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=7jFeZI07Tqr3KbqITdg4aFk%2BqxaNrPfAfETYG9htEXE%3D&reserved=0> Noticeably absent from the DEIS is any study related to the shedding of microplastics from wind turbine blades. How far are the epoxy resins distributed across the land? What effects will tons of BPAs strewn across the desert have on water quality, especially with the Snake River Plains Aquifer below the surface of the Lava Ridge project? Will these BPAs leach in to the groundwater? The mission of the BLM is "to sustain the health, diversity, and productivity of public lands…". How will the shed BPAs impact the health of wildlife, livestock, humans and agricultural crops in the surrounding area? Will the milk produced from the nearby organic dairies be contaminated with BPAs? How does blade shedding facilitate the BLM's mission of sustaining health? Will LS Power/Magic Valley Energy be held liable in the ensuing years if there is an increase in cancer rates, infertility, or other health problems? Until more studies are conducted to determine the possible detrimental impacts shed BPAs will have on public lands, it is far too great a risk to allow the Lava Ridge project to proceed.	See response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
12532-2	Jon McGregor	I have been studying the blade erosion on the propeller blades.The blades are constructed from epoxy consisting of 33% Bisphenol resin which is on the " Norwegian priority list of dangerous substances". Very little study has been on the blade deterioration. These chemicals are considered to pose a serious threat to human health and the environment and are placed on the Norwegian priority list. These blades are constantly giving off microplastic emissions. There is no mention of this in the Dies. "Bard-Einar Rimereit ,Weatherford Internatioal, Jan-Erik Weinbach Vestland county, Asbjorn Solberg. These turbines are sending toxic emissions in the air whenever they are turning.	As described in EIS Section 3.2.2 (Operation Air Quality and Air Quality–Related Values), project emissions, when added to background pollutant concentrations, are unlikely to violate the NAAQS, and the project area would remain in attainment for all criteria pollutants. It is outside the BLM's scope and authority to analyze specific industry wide manufacturing practices.
12871-2	Michelle Pabarcuis	Wind Farms are not a clean energy source. You have not asked more members of different wind-turbine groups who have technical and health expertise to be part of the group that either writes or reviews the final document. It is incomplete in it assessment so it is by no means a way for you to make any final decisions off of.	As described in the Cooperating Agencies section in EIS Appendix 10, the BLM and seven cooperating agencies participated in drafting the EIS. In addition, the BLM sought input from the National Renewable Energy Laboratory. Cooperating agencies are federal, state, Tribal, or local agencies that have jurisdiction by law or have special expertise regarding issues addressed in the EIS (40 CFR 1501.8).
12965-1	Mark Southwick	The Dietrich Quick Response Unit, Inc. is a totally volunteer non-transport medical rescue unit. We partner with Lincoln County Emergency Medical Services as our medical transport agency. Our response area is large, incorporating the Dietrich and Hidden Valley communities. Most, if not all of the proposed Lava Ridge Windmill (LRWP) turbines in Lincoln County are within our established response borders. Where the elevation of all the 740' windmill towers is above the surrounding buttes and existing radio towers, the project stands to disrupt and impact our emergency communications and response. The majority of our calls in the proposed LRWP use air ambulance services. Access to residences and our patients in and around wind turbines present a danger and liability to the medical personnel, the pilots and aircraft being used, eliminating a timely intervention. The project will add significantly to the number and severity of our emergency medical, accident and rescue responsibilities. Funding for, obtaining properly trained personnel and rescue equipment to prepare for such a project is extremely limited and difficult to obtain. There has not been any consideration or support for the upgrade	See AIB-11 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project impact emergency responders that serve the project vicinity? Potential impacts to local aerial fire responders are addressed in EIS Section 3.7 (Fire and Fuels Management). Effects to first responder communication pathways are addressed in EIS Section 3.8 (Land Use and Realty).

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		necessary for the Emergency Medical and First Responder units in Lincoln County. The Environmental Impact Statement has left out these issues.	
13011-3	Ron Yates	The EIS does not include and assessment or a means of mitigation or a means to protect all people and their property from physical or surreptitious attacks upon Homo sapiens, (humans) by groups and or individuals that are opposed to the Lava Ridge project. When the BLM does approve the Lava Ridge Wind Project how will this threat to Homo sa,Piens be addressed?	Vandalism and terrorism are illegal; it would be speculative to assume if, and to what extent, the law would be broken by any member of the public. The BLM is not aware of such types of vandalism at other wind energy projects. As needed, MVE would scale up project security in response to vandalism.
1622-1	Dawn Leiske	I am concerned by the lack of consideration in the Lava Ridge Wind Turbine EIS Draft document regarding our personal safety, as well as the protection of our Idaho public lands and private properties. Idaho, as well as the rest of the country, is suffering from the lack of qualified applicants and resignations in law enforcement. How will this safety issue be alleviated in Jerome, Lincoln, and Minidoka Counties as well as the neighboring counties affected by the Lava Ridge Wind Turbine project during construction and after completion? There will be financial and operational issues arising within law enforcement management due to this project. As it is, the Idaho Fraternal Order of Police claims applications for law enforcement and public safety jobs began dropping off years before the COVID-19 pandemic. How will we be able to guarantee our safety during and after the Lava Ridge Wind Turbine project is completed? The general population is aware that the reality of hiring law enforcement during this period of time is bleak at best, regardless of the project-related increases in local tax revenues. Page 3-222 3.6.3.2.2 ALTERNATIVE B (PROPOSED ACTION) / Operation The long-term addition of 486 miles of new roads that are open to the public could increase demands on local law enforcement; however, many of the new roads built for the project would be gravel roads mostly used for project access and are expected to have low use. Project-related increases in local tax revenues would help mitigate any increased demands placed on local law enforcement. MVE's applicant[1]committed measure 38 (see Table App4-2e, EIS Appendix 4) would minimize the amount of new roads to the extent practicable, which in turn would minimize the potential for increased demand on local law enforcement. Page 3-220 3-221 3.6.3.2.2 ALTERNATIVE B (PROPOSED ACTION) Construction During construction, the estimated 0.8% to 1.7% increase in total population of the tri-county area could increase the demand for community services in the local area (e.g., public schools and law enforcement); however, the increased demand is not expected to overwhelm the service providers' existing operational capacities or require a need for additional resources. Some public schools in the tri-county area could see an increase in enrollment due to non-local workers bringing their families with them; however, not all construction workers would have children or relocate their children with them (trade workers are expected to work for a subset of the construction period when their trade is needed). For the purpose of analysis, if it is conservatively assumed that 50% of all construction workers brought one child under the age of 18 with them, then the number of children in the analysis area would increase by up to 425, which is 2.8% above the existing population (14,921 children as of 2020) (University of Idaho Extension 2022a). Given that the average student-to-teacher ratio for the analysis area is 14.2 (University of Idaho Extension 2022b), the increase in the under age 18 population would increase the student-to-teacher ratio slightly to approximately 14.6. The increase in the tri-county area's population during construction could also increase demands on local law enforcement. An increase of 400 to 850 people in the tri-county area Lava Ridge Wind Project Draft Environmental Impact Statement 3.6 Environmental Justice and Socioeconomics 3-221 during construction would slightly reduce the number of police officers per 1,000 people to approximately 1.9 (compared to 2.1 in 2019) (University of Idaho Extension 2022c). Resources: Police And Other Public Safety Organizations Have Also Seen A Decline In Applications. Https://www.ktvb.com/article/money/economy/idaho-police-applicants-decline/277-8a339a4b-de7d-449b-9ffe-a2b86d936bb7 Survey on Police Workforce Trends WorkforceSurveyJune2021 (policeforum.org) Police officers in Los Angeles, Calif. in July 2022. From March 2020 to August 2022, the number of law enforcement workers decreased by 4%, according to data from the U.S. Bureau of Labor Statistics https://www.themarshallproject.org/2023/01/21/police-hiring-government-jobs-decline Please consider stopping this project altogether or addressing this critical issue of public safety, and the protection of our public land and private properties.	Effects to law enforcement are address in EIS Section 3.6.2 (Community Services, Employment, and Housing Availability). In addition, see AIB-11 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project impact emergency responders that serve the project vicinity?
2898-1	Adrian Arp	There are negative health effects from the turbines. Research from the Washington University School of Medicine reveals problems including nausea, vertigo, tinnitus, ear pressure and sleep disturbance in areas where turbines are installed.	See response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
3340-6	Sue Page	How will the EMFs, turbine vibrations, and noise, impact their livestock? Their health?	See EIS Section 3.9.2 (Physiological Effects to Livestock). Also see response to comment 1042-18 (see in Table A-3m, Human Health and Safety).
6075-3	Lorinda Grant, Douglas Grant	Studies show that under certain circumstances the wind turbines can be heard for approximately nine miles. These would cause noise pollution to all the houses that are within that area. The homeowners would be negatively impacted by loss of sleep and stress resulting from the infra-sound created by the turbines.	Noise information is provided in the project noise technical report (SWCA 2022) on the BLM project website. The report clarifies that turbines would be audible within 2.2 miles, and 500-kV transmission lines would be audible within 0.5 mile. Noise impacts are discussed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) and cover both construction periods and operation of the project. Section 3.6.1.2.2 (Alternative B [Proposed Action]) provides details on noise impacts to people and communities. Noise issues are also discussed in Section 3.9.2 (Physiological Effects to Livestock). Applicant-committed measures to address noise impacts can be found in Table App4-2i in EIS Appendix 4 (Mitigation).
7320-5	Lora Ohlensehlen	I am a Jerome County resident. I grew up on a farm within 5 miles of this proposed wind project. Several of my siblings continue to farm, and raise animals in this same area. There are an additional two generations of family members that live on these farms. That is 3 generations of my family, that currently live within 5 miles of this proposed project. My family has lived in this same area for 6 generations. I have concerns about how the wind	See response to comment 11566-1 (see in Table A-3m, Human Health and Safety).

Comment ID	Commenter	Public Comment	Response to Comment
		and vibrational energy created by these massive wind mills will affect the health and well being of the 3 generations of my family members.	
7336-1	Matt F.	Please accept my comment regarding the Lava Ridge Wind Project EIS as it relates to potential ice throw from the turbine blades that will be produced during the operations phase of the project. The concept of "ice throw" is a well known hazard created by wind turbines. It occurs when ice builds up on the blades, and then dislodges. This can cause large and heavy fragments of ice to be thrown into the air, landing hundreds of feet away. They can be deadly to life and severely destructive to property. Despite being a well known hazard for wind projects in areas with cold, snowy winters, the draft EIS volumes 1, 2a, 2b and 3 do not make any mention of ice throw, or ice shards. This represents a severe environmental threat to life and property with no mitigation plan. Before approving any alternative other than A, a comprehensive plan must be developed to address the deadly threat of ice throw. Further, said plan must include some type of bond or insurance which can be used to pay out affected parties, should they or their property be harmed by an ice shard.	AIB-14 was added to EIS Appendix 3 (Issues Analyzed in Brief): Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public?
7359-3	Name Not Provided	Farmers are also concerned about their own safety and the safety of those that work for them when it comes to possible fires, blades throwing ice, and blades breaking off or turbines collapsing. https://slate.com/technology/2017/08/why-farmers-in-iowa-hope-wind-energy-will-blow-over.html Shadow flicker and noise are annoying at best. There has been little evidence about how turbines affect people's health, but there is a lot of anecdotal evidence about how turbines can make people feel sick. "Wind turbine syndrome" is a term to describe adverse effects related to wind turbine proximity. Health effects include rapid heart rate due to a panic response, tinnitus, vertigo, panic attacks, migraines, ear pressure, nausea, problems concentrating and memory, and sleep deprivation. https://www.windturbinesyndrome.com/img/WTSguide.pdf	See response to comment 11566-1 (see in Table A-3m, Human Health and Safety) regarding noise and shadow flicker. AIB-14 was added to EIS Appendix 3 (Issues Analyzed in Brief): Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public? Fire safety is addressed in Section 3.7 (Fire and Fuels Management). Human health impacts are addressed in Sections 3.2 (Air Quality), 3.4 (Climate and Greenhouse Gases), 3.6.1 (Environmental Justice Communities), and 3.17 (Water and Wetland Resources).
7409-1	Sue Page	I come again to you with additional information that should cause everyone concern for the health and well being of humans and animals exposed to the vibrations caused by these machines. There doesn't seem to be any mention in the EIS of exposure to humans or animals and the damage to organs and tissues. These machines will be running around the clock. The continuous vibrations will resonate into the ground and can be heard through concrete. In the attached study, it says long term exposure can cause lesions in the vascular, osteoarticular and nervous systems.	See response to comment 11566-1 (see in Table A-3m, Human Health and Safety).
8206-2	Sheryl May	We are concerned about health effects due to the noise	See response to comment 11566-1 (see in Table A-3m, Human Health and Safety).
8421-4	Brian Olmstead	Another issue with water is the proximity of all the blasting to domestic wells, and to the Milner Gooding Canal. I was working for TFCC in 2007-2008 when we built the Midway Power Plant South of Kimberly Idaho. We blasted about 1/3 mile of Lava Rock about 20 feet deep for the tailrace of the plant. We almost immediately started getting reports of wells being contaminated with coliform bacteria. Before long all 7 of the residential wells within ¾ mile of the project were contaminated. It was pretty obvious to TFCC that the blasting had caused the contamination so we drilled new deeper wells, cased farther down, and eventually got pure water back to the homeowners. Blasting absolutely does open up new cracks in lava rock, and it most certainly can lead to contamination, and sickness to domestic well users!	Two new issues were added to the EIS to address well and canal integrity and water quality: Section 3.17.2 (Existing Groundwater Wells and Canals) and Section 3.17.3 (Groundwater Quality).
8632-3	Charles Van Vooren	If this is approved BLM will have to prove why. It's all on you and remember; a majority of Idaho residents do not want this! And also; who here in Idaho is getting paid, or receiving ANYTHING from anyone to approve this project? I want to know and I also want to see a study and research on electrical pollution from power lines and wind generators.	Pollutants are described in EIS Section 3.2 (Air Quality).

Issues Analyzed in Brief – EIS Appendix 3

Table A-3n. Issues Analyzed in Brief – EIS Appendix 3

Comment ID	Commenter	Public Comment	Response to Comment
11272-1	Clare Josaitis	Much of the 'Supporting Rationale' for exempting further analysis of the issues is very nebulous and generalized. Such as "The project would be designed to minimize electromagnetic interference where practical...". First of all, how is it going to be specifically designed to minimize EMFs? Why isn't this explained and layed out for the reader? "Where practical' is essentially meaningless and just a feel-good, catch-all-angles phrase.	See response to comment 10426-4 (see in Table A-3m, Human Health and Safety).
11491-37	Dean Dimond; Jennie Bateman	26. Seasonal access including snow/ ice load on wind turbines including breakdowns and access for snow and grass fire fuel load removal,	In response to public comments, additional discussion of ice throw from turbines has been added to Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-14. As described in MVE (2023), “Snow removal will be performed as required to ensure safe access for personnel. Snow removal will occur to accommodate daily traffic from public roads to the O&M facilities. Other project roads will be plowed if O&M staff needs to gain access to a particular Project component to perform O&M activities.” Impacts to fire and fuels management are described in EIS Section 3.7 (Fire and Fuels Management).

Comment ID	Commenter	Public Comment	Response to Comment
11505-1	Kristy Churchman	Southern Idaho Regional Communications Center (SIRCOMM) remains deeply concerned that the proposals by MVA may interfere with the integrity of SIRCOMM's operations in the region. While it is impossible at this early stage to completely identify all possible risks or problems the Project may cause for SIRCOMM, we once again identify and reiterate the following concerns: • Interference with the radio transmission and reception pathways near Dietrich Butte. • Interference with the transmission and reception pathways between the Dietrich, Hansen, and Gooding Tower Sites. • Interference with the transmission and reception pathways between Dietrich Butte and Skeleton Butte. • Interference with the transmission and reception pathways caused by the large equipment that will likely be utilized to construct the windmills proposed in the project. SIRCOMM recently completed a significant comprehensive project, at great expense, to improve the coverage of its telecommunication system based on the current conditions in the region. A project of the magnitude being proposed by MVE may place the future efficacy of this overhaul at risk. The statement below from the Commsearch report (Section 4-Recomendations, pg.8) cause us additional concern: 4. "Recommendations- In the event that a public safety entity believes its coverage has been compromised by the presence of the wind energy facility, it has many options to improve its signal coverage to the area through optimization of a nearby base station or even adding a repeater site. Utility towers, meteorological towers or even the turbine towers within the wind project area can serve as the platform for a base station or repeater site." The realization that "coverage has been compromised" would likely occur in the construction phase of the Project. Once compromise has been realized, efforts to repair the compromise may not be swift enough to avoid the disruption of emergency services to that region, which could impact human life and safety. The time and cost associated with "optimizing a nearby base station", "adding a repeater site" to a "utility tower, meteorological tower or turbine tower", can be lengthy, complex, and expensive. There also remains uncertainty as to the efficacy of these alternatives. And, if these things were required by the Project, SIRCOMM may not have the financial means to carry them out. It may therefore be appropriate to begin consideration and discussion about whether these potential costs should be part of overall Project expense. Included as an attachment with this letter, is a simple diagram showing the microwave pathways SIRCOMM is primarily concerned about. The Dietrich site serves as a "back-up" microwave system to our Jerome tower site. Should our microwave system in Jerome malfunction, the Dietrich site would then serve as our primary microwave simulcast system. Interference from any wind turbine structures at that point could prove disastrous.	See response to comment 10426-4 (see in Table A-3m, Human Health and Safety). Potential impacts to local aerial fire responders are addressed in EIS Section 3.7 (Fire and Fuels Management). Effects to first responder communication pathways are addressed in EIS Section 3.8 (Land Use and Realty).
11620-4	Simone Griffin; BlueRibbon Coalition	We would like the BLM to acknowledge that when public land is analyzed, studied or even used for solar or wind projects then there has been human impact. This impact from analyzing parcels of land for proposed renewable energy projects disqualifies the land from being designated or managed as Wilderness. Any future planning process needs to reflect the consideration of evaluated land for renewable energy and exclude these areas from restrictive management designations. This area is not the best suitable location for wind turbines according to recent studies. BLM MUST use best available science and in this case the no action alternative is the only alternative that uses such data.	In EIS Appendix 3 (Issues Analyzed in Brief), AIB-53 provides information on the impact of the action alternatives to wilderness ("How would project construction and operation affect wilderness areas?"). The EIS finds that wilderness areas are not present in the project area; the nearest is 28 miles northeast of the siting corridor (Craters of the Moon). AIB-53 provides more detail on related analysis contained within EIS Section 3.16 (Visual Resources), the air quality technical report (SWCA 2022a), and the noise technical report (SWCA 2022b) and found that "given the distance of Craters of the Moon Wilderness Area, the project would not be visually perceptible from within the wilderness area." In compliance with FLPMA, the BLM is required to manage public lands for multiple uses and authorizes the BLM to issue ROW grants on public land for projects in the public interest. The BLM is required to make three decisions based on a review of all components of the project (see Section 1.3 [Decision to be Made]).
11822-3	Bob & Linda Sojka	Unfortunately Americans have already seen attacks on power infrastructure elsewhere in the U.S. So, to ignore this aspect in today's world would be irresponsible. What will be the impacts of the necessary security measures of this project on range use and/or public access to Lava Ridge in the future? Has that cost to the project and to the state and local communities been included in your assessments?	All proposed security fences have been disclosed (EIS Appendix 11 [Project Elements Common to All Action Alternatives]) and the effects on livestock analyzed in the EIS (Section 3.9.1 [Grazing Allotments and Range Socioeconomics]).
11871-32	WildLands Defense	Weather Impacts – A Hard look Must Be Taken Regarding Air Velocity, Temperature, Moisture and Precipitation – i.e. weather – wind turbines also impact that: "The fluid-dynamic effects of wind turbines on the flow field in the turbulent atmospheric boundary layer are, in principle, well known. Wind turbines extract kinetic energy from the atmospheric flow. The influence of individual rotors and wind farms on the flow field pertains both to the mean flow and the turbulent fluctuations. Wind farms increase the effective surface roughness of the ground and redistribute the mean flow. In particular, they create upward flow (so-called convergence zones) upstream and downward flow (so-called divergence zones) downstream of the wind farms [49]. Moreover, the rotor blades create additional turbulent fluctuations that propagate downstream and intensify the turbulent kinetic energy per unit volume'. They also reference that "impacts are likely to affect agricultural practices" but did not attempt to quantify them. Zhou [52] analyzed satellite data of wind farms from a moderate-resolution image spectrometer (MODIS) in west-central Texas between 2003 and 2011. A warming of up to 0.72 K per decade, particularly at night, was demonstrated".	AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) examines how vegetation would be affected by changes to ground-level temperature from turbine operation. Based on previous studies and ground disturbance caused by the project and already analyzed, it was found that any ground-level temperature-related impacts would not be further impacted in a significant way.
11873-12	Mary Schwartz, Frank Schwartz	12. The DEIS, Appendix 3, AIB-43 discusses the air mixing phenomenon which occurs in the vicinity of the operating turbines, the associated ground temperature changes in those locations, and the potential response of vegetation. More mixing will occur with larger diameter turbine circles. The discussion concludes that effects are likely to be variable and site specific for the Lava Ridge project. How can a project such as this wind project be approved if the environmental impacts are not known and not addressed specific to this site? The DEIS is incomplete without addressing the potential significance of this impact.	Issues may be eliminated from detailed analysis when the impact context is so low that a detailed analysis is not needed to determine significance. Some issues eliminated from detailed analysis may involve resources that may be affected by the project, but effects would be relatively minor in comparison with the issues analyzed in detail. In compliance with 40 CFR 1502.2(b), this EIS has "only brief discussion of other than significant issues." AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) examines how vegetation would be affected by changes to ground-level temperature from turbine operation. Based on previous studies and ground disturbance caused by the project and already analyzed, it was found that any ground-level temperature-related impacts would not be further impacted in a significant way.

Comment ID	Commenter	Public Comment	Response to Comment
11873-13	Mary Schwartz, Frank Schwartz	13. The operation of wind turbines is accomplished by removing energy from the wind through contact with the turbine blades. The towers and other above-ground infrastructure also slow the wind speed as well as locally modifying flow direction. The resulting effect is slower wind speed downstream of each turbine and structure and localized changes in wind direction and temperature. With a wind farm such as this, with a large array of turbines, the overall wind speed downstream of this array will be reduced and will likely influence the adjacent wind direction and pattern downstream as well. The larger diameter turbines with taller towers have a greater influence on the wind changes than smaller turbines. With the continued addition of wind farms, both locally and nationally, this effect will result in changed wind patterns and temperature and an impact on the ecosystem of the area. These localized and broader differences must be understood and analyzed for its affect on the overall ecosystem and environment. This DEIS does not address this matter and is incomplete without addressing the potential significant environmental impacts of this phenomenon.	Issues may be eliminated from detailed analysis when the impact context is so low that a detailed analysis is not needed to determine significance. Some issues eliminated from detailed analysis may involve resources that may be affected by the project, but effects would be relatively minor in comparison with the issues analyzed in detail. In compliance with 40 CFR 1502.2(b), this EIS has “only brief discussion of other than significant issues.” AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) examines how vegetation would be affected by changes to ground-level temperature from turbine operation. Based on previous studies and ground disturbance caused by the project and already analyzed, it was found that any ground-level temperature-related impacts would not be further impacted in a significant way.
12221-1	Ken Kostka	Idaho is ag country. We have no idea how these monster turbines will affect the communication with GPS signals needed by todays ag operations.	See response to comment 10426-4 (see in Table A-3m, Human Health and Safety).
12685-3	Philip Gossi; Gooding-Lincoln County Farm Bureau	There is a need to better understand wind power and its effect on agricultural products. There is not enough evidence presented currently indicating that changing air stream flows will not impact weather and its relationship with established moisture patterns needed for plant growth that wildlife habitat depends on and agriculture relies on for a variety of crop and animal production.	See response to comment 11873-12 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).
12934-5	Rob Thornberry; Theodore Roosevelt Conservation Partnership	Address shooting-related vandalism. Since this is the first public land wind project proposed in Idaho, the BLM and the applicant would be well served in spelling out the conditions necessary for the project area to be closed in the face of vandalism. It is conceivable, albeit unlikely, that vandalism could damage infrastructure in a way that would necessitate the applicant to push to close the area to shooting sports to stop vandalism. That is a potential outcome that should be studied by BLM, and the applicant and solutions should be spelled out. Fencing the area to preclude recreation can’t be a potential solution. This issue needs the appropriate clarity. There is too great of a chance to lose access to 312 square miles of public ground to the careless actions of one public land user.	Vandalism is illegal; it would be speculative to assume if, and to what extent, the law would be broken by any member of the public. The BLM is not aware of such types of vandalism at other wind energy projects that have shut down shooting sports in the area. As needed, MVE would scale up project security in response to vandalism.
1455-1	Dean Dimond	In reviewing the DEIS I can't find anything that address how the Proposed Windmills will interfere with the GPS signal for my farm equipment. The RTK GPS system we use requires a fixed base station. While these station can be miles away it requires a line of sight. These windmills could easily obstruct that line of sight. And since this turbines will also be producing power that power generation will most likely infer with the communication signal. In addition the grid work of power lines will also most likely infer as well. I currently have a large power line going through my farm. This power line interferes with my radio signal, It shortens the life of my electrical components on my pivots, and it causes a lot of problems with the static electricity. Please require LS power to address these concern before approval of such a damaging project.	See response to comment 10426-4 (see in Table A-3m, Human Health and Safety).
3043-1	Cameron Stauffer	What the EIS is lacking is an understanding of this environment. Evaluating individual effects turbines and construction will have on certain species is a recipe for disaster. There needs to be a comprehensive approach to evaluating a large-scale change, like what is proposed for Lava Ridge. For example, if weather patterns are changed slightly that could have cascading effects on the local environment. More fires, less birds and more pests could take over quickly. I am writing to request, and urge BLM before it is too late, that more research NEEDS to be done on current and established wind energy in brittle environments, before we take on bigger projects in these very sensitive environments.	See response to comment 11873-12 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).
3997-8	Angelee Eames	6.These turbines will be visible for miles and will disrupt airflow patterns in our skies. The EIS does not state how the power of these turbines can and will change weather patterns. The SCience is clearly not available to answer this critical question. Why not wait until there is science that evaluates weather pattern changes. No research has been done on a project of this size. How do you "mitigate" Lava Ridge being the "first failure" due to lack of science. Wind energy has been tried and failed in many countries. Areas in the U.S. have huge piles of turbine cemeteries because you cannot recycle the fiberglass components or tower structures. Look in the Texas department of lands study.	See response to comment 11873-12 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).
3997-9	Angelee Eames	7. If the majority of the power is transmitted across the lines 487 miles south-what is the ground and air impact from 1,000 megawatts inside these transmission lines-how will they be protected from fire, vandals, and terror threats? MVE says they are "pursuing technology" that will turn the red airplane lights on and off-so they DO NOT have the science currently? Once again Lava Ridge will be a "first failure" without science.	The SWIP-North transmission line and Section 368 Energy Corridors was previously authorized via different processes and are not part of the BLM’s decision for the project. As described in EIS Appendix 11 (Project Elements Common to All Action Alternatives), if approved by the FAA, MVE would deploy ADLS to mitigate the need for continuous operation of the flashing red lights during nighttime hours. ADLS is existing and proven technology used in other areas. See Section 3.7 (Fire and Fuels Management) and Section 3.8.1.1 (Land Use Authorizations, Affected Environment). Vandalism and terrorism are illegal; it would be speculative to assume if, and to what extent, the law would be broken by any member of the public. The BLM is not aware of such types of vandalism at other wind energy projects. As needed, MVE would scale up project security in response to vandalism.

Comment ID	Commenter	Public Comment	Response to Comment
4018-2	Dave Jakovac	The proposed wind turbine farm will have adverse effects on wildlife in the area, may even eliminate some endangered game birds, migratory animals and multiple preditors from the ecosystem. These proposed wind turbines will adversely affect our skyline and create issues with increased ground and air temperatures due to the increase in hard and reflective surfaces. These concerns need to be addressed and found inert to degradation of land, air, and wildlife before consideration for permit by law.	See response to comment 11873-12 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3). EIS Chapter 3 (Issues Analyzed in Brief) provides detailed information about the analysis of the action alternatives on the affected environment, including visual resources, avian species, and wildlife.
6868-8	Barbara Martien	Idaho values its land and the natural environment. We hold a precious resource. The reality is wind power stations are no parks. They are industrial and commercial installations and do NOT belong in wilderness areas.	See response to comment 11620-4 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).

Land Use and Realty, including Aviation

Table A-3o. Land Use and Realty, including Aviation

Comment ID	Commenter	Public Comment	Response to Comment
1054-1	Jeff Juker	Is there a proposed rental agreement for the project?	If approved by the BLM, the project would be authorized to use BLM public lands for the life of the project under a ROW grant, with terms and conditions. See EIS Section 1.3 (Decision to be Made) for a detailed description of the BLM's decision to be made. Also see response to comment 11216-1 (see in Table A-3o, Land Use and Realty, including Aviation).
11212-3	Ruth Muir, Ira Muir, Sherri Roche	New transmission lines will need to be installed which will cut through prime farm ground.	The EIS analyses potential impacts to prime farmlands in AIB-34.
11213-1	Tim Neilson	Yes, its Federal land but its IN THE STATE OF IDAHO and there is a States Rights issue involved.	As discussed in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the BLM conducted consultation and coordination with cooperating federal, state, and local agencies. Coordinated by the Idaho Governor's Office of Energy and Mineral Resources, various Idaho state agencies have provided input on the project (see Table App10-2 of EIS Appendix 10). Comments from the State of Idaho have been incorporated into the EIS analysis and coordination with the State of Idaho is ongoing.
11216-1	Eric Campbell	After brief searches, I have been unable to find anything about lease agreements. Unless the land is being sold to, or leased at a fair market value, the BLM, as well as the State of Idaho land involved, should not be just "given" to a private business regardless of the reasoning. Tax payers should not be forced to subsidize the profits of a cooperation. If a company won't pay a market price for leasing or buying property, don't allow the company to get rich using tax payers public lands.	Portions of the project that occur on public BLM lands would be authorized through the issuance of a ROW grant, which requires payments be made to the BLM in the form of rental fees. As stated on the BLM's ROW program website (https://www.blm.gov/programs/lands-and-realty/ROWs), rental fees are calculated on a per-acre basis, according to schedules that reflect local real estate values, and in the case of renewable energy projects, the value of the electric power generated. Fee schedules vary according to the type of ROW, and for larger sites, rental fees are determined after an appraisal. In addition to rental fees associated with the ROW grant, the project would be required to pay property taxes to the state and local counties in which the facilities are located. EIS Section 3.6.3 (Local and Regional Economy) analyzes the project effects on the local and regional economy and provides an estimate of property tax payments during construction and operation.
11491-9	Dean Dimond, Jennie Bateman	Further, there is not a transparent plan for a power transmission ROW that must be part of this project EIS.	The EIS analysis of the Proposed Action does account for ancillary facilities and their associated ROW needs, including 34.5-kV collector lines, collector substations, 230-kV and 500-kV transmission lines, and a single 230/500-kV substation. As stated in MVE (2023), the project's proposed 500-kV transmission line would interconnect with the existing Midpoint Substation or an alternative new substation located along the SWIP alignment. Once the project's proposed facilities reach their point of interconnection (POI), any ROW needs that extend past the POI would be managed by Idaho Power Company (IPC) per the terms of the project's interconnection agreement with IPC. The existing Midpoint Substation and proposed SWIP-North transmission line that the project proposes to interconnect to are both analyzed in the EIS within the context of cumulative effects (see EIS Section 3.1 [Introduction and Methodology]).
11535-100	Steven Andersen	Electromagnetic interference, which is the potential blockade, scattering, and modulation of signals emanating from the communication (television or radio), radar (surveillance), and navigation systems by the rotating turbine's blades, has been an ongoing problem with massive wind farms.311 There is a demonstrable link between large wind farms and and interference or degradation of communication signals for existing and necessary means of communications on land, air or water.312 Interference with emergency communication by emergency medical personnel, fire fighters, EMS and other first responders who rely on accurate communication signals in order to perform their emergency services is a serious issue for the surrounding communities. None of this was studied and it should have been. The safety of the local communities is at risk if these systems are jeopardized. Owing to their huge dimension and continuous motion, wind turbines can interfere with radio-electric signals, such as those emitted by television broadcasting. Distorted television signals are usually the result of two independent mechanisms: the shadowing effect and time dependent multi-path due to signal scattering by wind turbines. The scattered broadcasting signals are mostly attenuated, time-delayed, and phase shifted copies of the actual signal, which differs based on the blade rotation and orientation of the rotors. The reflected signals on the metallic parts of the wind turbine caused static ghosts in transmission of analogue television service. More often than not, the rotating blades resulted in variations in brightness. A number of software simulation tools can be used to analyze models and predictions of the impacts of wind turbines on digital television signals. 314 In	Potential effects of the project on communication services are analyzed in Section 3.8.1 (Land Use Authorizations) of the EIS. EIS Section 3.8.1 identifies communication services (i.e., registered frequencies) associated with emergency first responders; industrial or commercial operators; and other state, county, and local municipal agencies. Additional communication uses in the area (e.g., telephone and broadband) were identified during scoping and incorporated into the EIS analysis. The impacts of wind turbines on communication services identified are analyzed in the EIS, and design features and other mitigation measures to reduce signal interference are discussed. These include MVE completing a line-of-sight interference study, incorporating setbacks, and coordinating with local communication providers and operators to resolve issues identified. Also see response to comment 11978-67 (see in. Table A-3cc, Mitigation – EIS Appendix 4). Potential effects of EMFs are further analyzed in EIS Appendix 3 (Issues Analyzed in Brief) (see AIB-12), which explains that the project would comply with applicable FCC regulations. The National Telecommunications and Information Administration (NTIA) is predominantly a policy and political advisory agency who works at the national level. Consultation with NTIA is not warranted for the project at this time.

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		this area, networks operate on a line-of-site basis; and therefore, large physical obstructions can impede the transmission line-of-sight signals – and yet, this is not addressed at all in the DEIS. Further, the National Telecommunications and Information Administration was never consulted to assess potential impacts on technical communications for both the government and private citizens.	
11535-101	Steven Andersen	Modern agriculture is a precision data-driven industry. Farmers rely on GPS with terrestrial-based correction signals to operate much of their large machinery to sub-inch accuracy. Additionally, irrigation systems utilize telemetry and supervisory control and data acquisition (SCADA) systems providing intelligent use of scarce water resources and alarming of time sensitive critical system failures which could be the difference between a successful season and crop failure in the hot Idaho sun. Data, and access to data, in their homes, vehicles, and cell phones is critical for running their farm operations. There is a complete disregard of this issue, or fundamental misunderstanding of it, in the DEIS. As noted above in the aviation section of comments, an inadequate evaluation of GPS interference, terrestrial based correction signals, and heavy use of the unlicensed industrial scientific and medical (ISM) band, was conducted and that failed to account for 500 wind turbines and their impact on these mission critical radio communication systems.	Section 3.8 (Land Use and Realty) of the EIS has been revised to discuss farming-related communication uses in the analysis area (see Section 3.8.1.1.4 [Communication Sites]) and to analyze how they might be affected by the project (see Section 3.8.1.2 [Impacts]).
11535-102	Steven Andersen	Further, the DEIS only evaluates licensed frequencies. For example, there are GPS correction signals for heavy machinery utilizing real-time kinematic positioning (RTK) from multiple equipment vendors (John Deere and Tremble), which operate in the ISM Band off of Kimama Butte, which are not addressed in the draft EIS. 315 Additionally, most broadband Internet access is provided to end users by technologies utilizing frequencies in these same ISM Bands, funded in part thru Federal programs such as the Rural Digital Opportunity Fund, the Connect America Fund, and the USDA ReConnect program. The DEIS relies solely on an evaluation of Licensed frequencies, which is inadequate and based off false assumptions. In rural areas, licensed microwave paths are frequently used for backhaul of data to other locations with better access to primary data centers.317 These technologies broadcast in very specific directions on very narrow beams, and any occlusion into the path will render the link unusable. Authorization for amendments to these licensed links requires extensive coordination with the FCC, and in many heavily congested microwave areas new licenses are very difficult, if not impossible, to obtain.318 In the DEIS (on 3.264), it is stated: “MVE’s coordination with communication providers and operators is ongoing to identify specific sites and pathways of concern in the analysis area.” It is not clear what efforts exactly have been undertaken and what specific sites or pathways of concern were identified, and therefore this vague statement provides little value for the reader. Mr. McCarthy was not contacted by anyone from MVE, and he is a key communications provider in the analysis area.319 Local Internet Service Providers, Cellular telephone providers, State of Idaho internal Emergency Management, and other land mobile radio providers all heavily utilize microwave for backhaul on Kimama Butte.	EIS Section 3.8.1.1.4 (Communication Sites) analysis has been revised to include additional details regarding the types and names of licensees that occur in the analysis area based on the database query of registered frequencies completed for the EIS. This list includes key communications providers (e.g., Verizon, Sprint, and AT&T) and other regional emergency management providers. The EIS has also been revised to discuss farming-related communication uses in the analysis area, which are not reflected in the list registered licensees but could potentially be affected by the project.
11535-103	Steven Andersen	The DEIS notes that the siting for the turbines has not yet been determined, and therefore, it is impossible to thoroughly analyze potential interference; however, based on the form MVE submitted to the FAA, there are at least 9 wind turbines that would impact the first frezenal zone of links, impacting anthem broadband.320 Loss of these critical back haul links would render much of these communications systems inoperable.321 The DEIS failed to accurately analyze potential impacts. Due to the nature of the links being unlicensed, Comsearch and MVE would have no way of knowing what is in use. On page 3-267 of the draft EIS, it states: Comsearch (2020) assessed the impact of wind turbines on communication sites. Results of this assessment indicate that the impact of wind turbines on communication services is consistently low, despite variations amongst different services in terms of frequency ranges and the type of services provided (including voice, video, and data applications). Each network is designed to operate reliably in a non-line-of sight environment, and many land mobile systems are designed with multiple base transmitter stations that cover a large geographic area with overlap between adjacent transmitter sites to provide handoff between calls. Therefore, any signal block that may be caused by wind turbines would not materially degrade the reception because the end user would likely receive signals from multiple transmitter locations. In addition, the frequency of the operation for these services would allow the signal to propagate through the wind turbines. The DEIS cuts and pastes this language from the same Comsearch report that is provided in many other wind power cases (including cases in MN, NY, KS, etc.). Note that in one report with identical language, Comsearch concludes its report by stating: “For this location, turbine locations were not provided; thus we could not determine if any potential obstructions exist between the planned wind turbines and the incumbent microwave paths.”322 That is exactly the scenario in this case. Comsearch didn’t conduct a tailored analysis to this project. They didn’t look at all used bands. Rather, they did the quickest and cheapest analysis and solely referred to those reflected in FCC licenses – but this is inadequate and fails to capture unlicensed frequencies, which are used in this particular region.	As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), the project’s final design and engineering would be completed after the BLM has issued a ROD and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. This approach provides flexibility for the project design to be adjusted in response to resource constraints through site-specific engineering for the final layout. As described in Section 3.8.1.2.2 (Alternative B [Proposed Action]), resource constraints related to communication uses would be identified prior to final design and siting of project infrastructure, through completion of a line-of-sight interference study. This study would further identify communication pathways potentially blocked by the project’s proposed infrastructure to determine where potential impacts to existing communication towers can either be avoided through micrositing of infrastructure or mitigated. In addition, per MVE’s applicant-committed measures 27 and 28 (see EIS Appendix 4 [Mitigation]), the project would be designed to minimize electromagnetic interference [e.g., impacts to radar, microwave, television, and radio transmissions] where practical and would comply with applicable FCC regulations. In the event the project results in electromagnetic interference, MVE would work with the owner of the impacted communications system(s) to resolve the problem.
11535-105	Steven Andersen	In summary, there was an inadequate electromagnetic analysis to demonstrate that interference will not impact national security, emergency responders, farmers, AM, cellular, and TV. There was no analysis of critical zones compared to siting under the alternatives and potential compromises or obstructions to be avoided. In fact, the exact location of the towers is unknown, making an analysis and meaningful participation in the analysis of this issue inherently problematic, as key information is missing. What we do know is the foot print of the project and size of the 600+ proposed towers will be massive – taller than any ever constructed. Based on what we know, there is a high likelihood of interference with LMR for public safety and commercial use; blocking of microwave paths used for back haul; interference with GPS correction signals (RTK); interference with SCADA and Telemetry used on irrigation control systems; and interference with internet connectivity through cellular or other fixed wireless systems. All of this was inadequately addressed in the DEIS.	As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), the project’s final design and engineering would be completed after the BLM has issued a ROD and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. This approach provides flexibility for the project design to be adjusted in response to resource constraints through site-specific engineering for the final layout. As described in Section 3.8.1.2.2 (Alternative B [Proposed Action]), resource constraints related to communication uses would be identified prior to final design and siting of project infrastructure, through completion a line-of-sight interference study. This study would further identify communication pathways potentially blocked by the project’s proposed infrastructure to determine where potential impacts to existing communication towers can either be avoided through micrositing of infrastructure or mitigated. In addition, per MVE's applicant-committed measures 27 and 28 (see EIS Appendix 4 [Mitigation]), the

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			project would be designed to minimize electromagnetic interference [e.g., impacts to radar, microwave, television, and radio transmissions] where practical and would comply with applicable FCC regulations. In the event the project results in electromagnetic interference, MVE would work with the owner of the impacted communications system(s) to resolve the problem.
11962-5	Cassie Christensen, Tyler Christensen	How long is Magic Valley Energy going to be allowed to use our public lands? Is there a lease agreement that will be made? Is it possible to look at other sources of energy that leaves a smaller footprint to our precious lands? What happens when Idaho needs more power but all of our lands have been used up to ship it out of state?	As described in EIS Section 2.3.3 (Project Phases and Duration), the project duration would be up to 34 years total, which includes 2 years of construction, up to 30 years of operation and maintenance, and 2 years of decommissioning. If approved by the BLM, the project would be authorized to use BLM public lands for the life of the project under a ROW grant, with terms and conditions. As discussed in EIS Section 2.1 (Alternatives Development Process), the BLM analyzed a range of alternatives to address issues identified during internal and external scoping. This included, but was not limited to alternatives with a smaller footprint compared to the Proposed Action. A total of four alternatives were carried forward for detailed analysis in the EIS, including three alternatives that have smaller siting corridors and disturbance acreages compared to the Proposed Action. As described in EIS Section 1.3 (Decision to be Made), The BLM's decision space for this EIS is limited to the ROW grant, the location of the proposed facilities, and terms and conditions attached to the ROW grant. Decisions related to the state of Idaho's long term energy security are outside the scope of this EIS.
11981-1	Ron Stradiotto	I was brought up with the idea that BLM land was public land for the public's use. My family fought in WW II and access to public land was a patriotic right. It was also our duty to look after and care for these lands. I now feel largely the same. However, I feel the balance has turned towards private corporations and profits instead of the public(ie people). Please consider your fiduciary role in managing these lands of the "American People" in your considerations to grant access to these same lands and consider "multi purpose" in your decision.	The BLM has considered and developed the EIS to be consistent with all applicable federal, state, and local statutes, regulations, and permit requirements that are described in EIS Chapter 1 (Introduction) and Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies). In addition, the EIS was developed in accordance with applicable BLM plans and policies described in EIS Section 3.1.2.2 (Tiering to the 2005 Programmatic Wind Environmental Impact Statement) and EIS Appendix 2. As stated in EIS Section 1.2 (Purpose and Need), the BLM's need for the EIS arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V). Therefore, preparation of this EIS is consistent with FLPMA's multiple use mandate, and the BLM's purpose and need statement reflects this.
12307-36	Dean Dimond	Need new information on project scale effects on other aspects of human use of public lands in addition to grazing,	EIS Section 3.8.1 (Land Use Authorizations) analyzes potential effects of the project on authorized land uses and ROWs, communication sites, or FAA/aviation uses. As described in Section 3.8.1.1.2 (Authorized Land Uses), grazing land uses cover approximately 91.7% of the analysis area; therefore, the level of analysis devoted to grazing land uses in the EIS is commensurate with the scale and importance of grazing in the analysis area. Potential effects on other types of land uses, such as agriculture, rural residential, and recreational uses, are analyzed not only in the land use chapter (see Section 3.8.1.2 [Impacts]) but also within the context of other resource analyses, including but not limited to recreation, visual, and environmental justice and socioeconomics. Section 3.8.1 of the EIS has also been revised to discuss farming-related communication uses in the analysis area (see Section 3.8.1.1.4 [Communication Sites]) and how they might be affected by the project (see Section 3.8.1.2).
6913-4	Public Comments Canyon Crest Events Center	My big concern is on our RTKs on our tractor's GPSs. Our towers are only a little over 200 feet tall and -- around Jerome Butte, Kimama Butte and Eden Butte and all that. And all the dealerships work together to get us this RTK, which is just an inch minus variance on our guess rows. But what it does is all the farmers that plant with it, cultivate with it, everything else. I've had White Cloud tell us that the blades will interrupt the signals and everything, because they tried getting signals down into Bennett Hills, Glenns Ferry area off of Rattlesnake Hill out of Mountain Home and they had to divert their signals clear around them towers out there at Bennett Hills because they couldn't get the signals to them. They would interfere. It would drop out and then it has to loop back in. And I don't know what will happen where they enclose all of Hidden Valley with all these towers, and I can't seem to find out where the environmental studies every studies that. That's how we run it. That's how we farm. And I don't know what it impacts on the environmentalists, I don't know where it goes in, what section or anything like that, because that's what they comment -- we had to comment, we had to find what section -- I just don't know where it is on the environmental impact statement. I couldn't find it, and my sister-in-law couldn't find it, so -- and I talked to Casey and he says he didn't know where it is, either. It has not been brought up.	Section 3.8.1 (Land Use and Realty) of the EIS has been revised to discuss farming-related communication uses in the analysis area (see Section 3.8.1.1.4 [Communication Sites]) and to analyze how they might be affected by the project (see Section 3.8.1.2 [Impacts]).
7377-1	Louis Zamora; Twin Falls Canal Company	Communication Issues In section 3.8.1.1.4 of the EIS it talks about communication sites and lists some of them. Microwave signals need a clear line of site without interference that could scatter the signal. One major site that is not listed is Jerome Butte. Just go to Jerome Butte (east of Jerome and east of Highway 93) and look at all the towers and which way the microwave heads are pointing. They are pointed to Gooding, Dietrich, Kimama, Skeleton, Hansen, Hazelton, Burley and many other Buttes and sites that are not listed in the EIS. All of these sites point to each other to provide a network that connects the valley together. Skeleton Butte actually has a microwave link going straight to the Dietrich school, which is in the path of the proposed project. If you start drawing lines between all the sites listed and unlisted, I don't know how you could place windmills in a pattern that would not cause interference. The EIS only listed two companies, SIRCOMM and Project Mutual Telephone. What about Verizon, AT&T, CenturyLink, Idaho Power, television stations, radio stations and canal companies that use these sites. Then you have broadband companies that supply internet, like Anthem, White Cloud, Sparklight, and Tekfinity. The list of companies that use these sites is long and I only listed a few. Then there are GPS stations on these site that the farmers use for their equipment. How would that be impacted. An unknowing person would be astonished how many signals and paths are crisscrossing this valley to provide us the communications that we enjoy. The Section listed above is a very inadequate and does not represent the impacts to the communication network in this valley. There definitely needs more research and a full plan done,	Section 3.8.1.1.4 (Communication Sites) of the EIS characterizes the affected environment for communication-related uses by identifying registered frequencies that intersect the analysis area rather than identifying specific communication facilities (e.g., tower locations) that occur within the analysis area. Therefore, the towers located on Jerome Butte and Skeleton Butte may be accounted for in the EIS analysis, so long as their registered frequencies are area-based/regional in nature and intersect the analysis area. Section 3.8.1.1.4 of the EIS analysis has been revised to include additional details regarding the types and names of licensees that occur in the analysis area based on the database query of registered frequencies completed for the EIS. Many of the companies mentioned by the commenter (e.g., Verizon, AT&T, and Idaho Power) were identified in the database query performed for the EIS and are now listed in the EIS analysis to provide additional detail. The EIS has also been revised to discuss farming-related communication sues in the analysis area and to analyze how they might be affected by the project.

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		and reviewed just for this subject alone. I don't believe people would be very happy if you start messing with the communications of our first responders, internet, cell phones, etc. There is just too much left out of this section to make any educated decision.	
9213-1	Richard Dinges	In chapter 2.3.1 Project Location, Siting, Landownership, and Jurisdiction and on page 2-2, there is the following paragraph: "Most project components would be located on BLM public lands. Several State of Idaho-owned parcels are also present in the siting corridors and would provide opportunities to locate additional wind turbines, collector and transmission lines, and potentially other ancillary components. Tracts of privately .....". I am very surprised to see that State of Idaho-owned land is being included in the Lava Ridge project. I was under the impression that this project was being sited only on BLM public land. I am not aware of any comment by the State of Idaho that they are partners in this project. I do not believe that the BLM EIS would apply to state owned land. Yet, when I look at the siting map, I see Idaho state lands under the hashed area shown for the turbine corridors. It appears that the phrase "would provide opportunities" is now a fact. Is Idaho receiving compensation? Are these state owned lands being used for grazing and the leases being pulled from the ranchers?	As described in EIS Section 3.8.1.1.1 (Land Use Designations), most of the siting corridors for Alternative B are on BLM public lands (75,760 acres), with smaller portions on state (2,910 acres), BOR (288 acres), and private land (5,417 acres). As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and jurisdiction) the EIS evaluated the entirety of the siting corridors for potential impacts because the exact location of infrastructure and activities within the siting corridors is unknown at this time. Therefore, although the siting corridors intersect state-owned lands, it is unknown which, if any, project facilities would be sited on state lands, or where they would be located. As discussed in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the State of Idaho is a cooperating agency for the EIS and has been involved in the planning, scoping, and EIS analysis phases of the project. Coordinated by the Idaho Governor's Office of Energy and Mineral Resources, various Idaho state agencies have provided input on the project (see Table App10-2 of EIS Appendix 10). Comments from the State of Idaho have been incorporated Into the EIS analysis and coordination with the State of Idaho is ongoing. EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies) lists all permits and approvals that would be required from the State of Idaho, should any project facilities end up being sited on state owned lands. Of the state permits listed in EIS Appendix 2, many of them would involve payments from MVE to the State in the form of permit fees or property taxes. The analyses presented in EIS Sections 3.9 (Livestock Grazing) and 3.9.1 (Grazing Allotments and Range Socioeconomics) address potential project effects on grazing uses throughout the entirety of the siting corridors, including allotments that intersect both BLM and state-owned lands.
9473-4	Jeffrey Warren	What about the damage from the 400 to 500 miles of roads that will have to be constructed to install and maintain these turbines?	The EIS includes an analysis of the potential effects of proposed access roads on each of environmental resources analyzed in Chapter 3 (Affected Environment and Impacts). Access roads are included in the description of the Proposed Action (see Section 2.3 [Project Elements Common to All Action Alternatives]) and are defined as a type of ancillary facility that is included in the siting corridors. In addition, the estimated disturbance acreages presented in Section 2.3 (Table 2.4-2) account for the siting corridors and disturbance acreages associated with proposed access roads. The siting corridors and estimated disturbance acreages presented in Chapter 2.3 were then used to inform the resource analyses presented in Chapter 3. EIS Appendix 4 (Mitigation) includes applicant-committed measures regarding roads and traffic. Tables App4-2e and App4-2m provide details about mitigating the impacts to roads and of road use. The BLM requires certain mitigation measures that include road usage and are shown in Table App4-3.
9595-1	Sandra Machado	I have been deeply troubled by the proposed Lava Ridge Wind Project and how it will affect all the things I love about our state of Idaho. Prior to living in Idaho, we lived in the San Joaquin Valley, California. There were many fruit & nut orchards spread throughout the valley, because of the climate there to grow produce. Not often, but I remember a few times there was a risk of unusual freezing temps in the valley. The farmers would construct wind mills or fans over the orchards, which would change the air pressure and raise temperatures 5-8 degrees, preventing their crop from frost damage. If these relatively small fans can change the air pressure and temperature in these orchards, how might these large wind mills that are proposed to come to our Magic Valley effect our air pressure and temperatures across our valley? How might these changes affect agricultural in the Magic Valley. Being Dairy Farmers ourselves, we are greatly concerned about this proposed project and how it will affect the crops that we rely on to feed our dairy herd.	AIB-44 (Vegetation) in EIS Appendix 3 (Affected Environment and Impacts) analyzes how turbine operation would affect ground-level temperatures and vegetation phenology. As stated in AIB-44, studies have shown that turbines can affect surrounding vegetation (within 295 feet of the turbines, according to one study) by changing ground-level air temperatures and humidity levels. Another study is cited that points to the potential for vegetation to be affected up to 1.9 miles from turbines due to changes in soil moisture downwind of turbines. However, data regarding the response of vegetation to wind facilities show varied outcomes (increased growth in one study and decreased growth in another). This is because vegetative responses to win facilities are influenced by several factors such as vegetation type, wind speed, photoperiod, humidity, dormancy requirements, the time of day or year, precipitation regimes, and the relative concentrations of atmospheric gases. Therefore, the effects of turbine operations on ground-level temperatures and vegetation phenology or productivity are difficult to predict with any certainty but would likely be variable and site-specific. AIB-44 concludes that the project could impact the phenology of vegetation within 295 feet of each turbine location, likely in the form of warmer temperatures in the winter and potentially a longer growing season; however, these impacts would occur in a small proportion of the analysis area (3%) and would occur within the footprint of construction and decommissioning disturbance at each turbine, which is already accounted for in calculations of impacts to native upland plant communities (see EIS Section 3.15.1 [Native Upland Vegetation Communities]).
9919-2	Kenneth Vaughn	In a recent article in Journal Science Direct, Chinese researchers stated that wind farms on premium farm/agricultural lands causes drying of surrounding soil, which may increase the damage caused by drought. "The long-term operation of wind turbines can affect local climates. Soil moisture affects ecosystem balance, so determining the impact of wind farms on soil moisture is important..." Their research shows that the operation of wind turbines will cause "significant drying of the soil", with a measured decrease of 4.4%. Wind farms aggravate the soil drying in grassland areas, which may negatively impact grassland ecosystems. In a state like Idaho which has a dry climate to begin with in the areas wind farms are p resently located, as well as being prone to drought conditions, a 4.4% decrease in soil moisture could be catastrophic to agriculture.	AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief) analyzes how turbine operation would affect ground-level temperatures and vegetation phenology. As stated in AIB-44, studies have shown that turbines can affect surrounding vegetation (within 295 feet of the turbines, according to one study) by changing ground-level air temperatures and humidity levels. Another study is cited that points to the potential for vegetation to be affected up to 1.9 miles from turbines due to changes in soil moisture downwind of turbines. However, data regarding the response of vegetation to wind facilities show varied outcomes (increased growth in one study and decreased growth in another). This is because vegetative responses to wind facilities are influenced by several factors such as vegetation type, wind speed, photoperiod, humidity, dormancy requirements, the time of day or year, precipitation regimes, and the relative concentrations of atmospheric gases. Therefore, the effects of turbine operations on ground-level temperatures and vegetation phenology or productivity are difficult to predict with any certainty but would likely be variable and site-specific. AIB-44 concludes that the project could impact the phenology of vegetation within 295 feet of each turbine location, likely in the form of warmer temperatures in the winter and potentially a longer growing season; however, these impacts would occur in a small proportion of the analysis area (3%) and would occur within the footprint of construction and decommissioning disturbance at each

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			turbine, which is already accounted for in calculations of impacts to native upland plant communities (see EIS Section 3.15.1 [Native Upland Vegetation Communities]).
10430-1	Name Not Provided	The effects on the local Jerome Airport will be very damaging and raise many safety concerns. This airport is used for private use and for our local farmers to have their fields sprayed. With the growth of our community our little Jerome airport will also expand.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome Airport.
10512-4	S. (No Last Name Provided)	I also have sizable concerns about Lava Ridge project's impact on aviation for our area. Crop dusting is critical to the success of crops that many in our area rely on for their living and others rely on to get food in the grocery store. Hidden Valley will be almost inaccessible to crop dusters if the project goes through.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). With regard to the Hidden Valley, the Preferred Alternative was identified, in part, to address concerns with access to the Hidden Valley for aerial applications.
1053-3	Sue Page	My next area of concern is the wind wakes caused by turbines. Specifically, the significant roll hazard to general aviation aircraft, crop dusters, helicopters - Life Flight and the light aircraft and helicopters used by Fish and Game to track herds of animals. A study needs to be compiled to determine the effects of the wind created	An issue analyzed in brief was added to EIS Appendix 3 (Issues Analyzed in Brief) to address concerns regarding turbine wake. According to data from the National Transportation Safety Board's (NTSB's) Aviation Database Query and Case Analysis and Reporting Online (CAROL) databases, the independent federal agency charged by Congress with investigating every civil aviation accident in the United States, there are no aircraft mishaps attributed to wake turbulence from wind turbines. While various studies have documented the potential for wake turbulence from wind turbines, it is well within the ability of pilots to avoid this potential hazard. Because of the passive generation of this type of turbulence from wind turbine blades (as opposed to the similar type of turbulence that is generated by the wing of a powered aircraft) the effects from wind turbines turbulence are limited in distance and very predictable. Pilots are instructed about the effects of turbulence and wake and are trained how to recognize situations that might create the turbulence, avoidance, and/or how to handle it. Pilots operating light aircraft downwind of the proposed wind turbines would need to exercise the same due diligence and awareness of possible turbulence and wake as they would normally be expected to in those situations.
1053-4	Sue Page	A study needs to be compiled to determine the effects of the wind created on fertilizers spread by crop dusting. As we know crops are not dusted in winding conditions so how will a constant wind affect the farms in the surrounding areas? Will the fertilizers be blown out over sage brush areas and the wildlife causing environmental damages?	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
1075-1	Sue Page	I am opposed to the windfarm proposal at Lava Ridge and wish the BLM to consider this study of the affect the wind generated on aircraft. Wind Energ. Sci., 3, 833-843, 2018 https://doi.org/10.5194/wes-3-833-2018 (c) Author(s) 2018. This work is distributed under the Creative Commons Attribution 4.0 License. The report indicates the adverse effect the turbines have on aircraft and the hazard of rolling to light wing and helicopters. Fixed wing cropdusters and helicopters are at risk from downwind effects. Any chemicals they might try to spread could be defused and spread over other wild life rather than the intended targets. I submit a review and study must be conducted to determine the effect these turbines have on aviation within and around the Lava Ridge Project. Article: Do wind turbines pose roll hazards to light aircraft? Jessica M. Tomaszewski1 , Julie K. Lundquist1,2 , Matthew J. Churchfield2 , and Patrick J. Moriarty2 1Department of Atmospheric and Oceanic Sciences, University of Colorado, Boulder, CO 80309-0311, USA 2National Wind Technology Center, National Renewable Energy Laboratory, Golden, CO 80401-3305, USA Correspondence: Jessica M. Tomaszewski (jessica.tomaszewski@colorado.edu) Received: 20 May 2018 - Discussion started: 19 June 2018 Revised: 13 September 2018 - Accepted: 16 October 2018 - Published: 2 November 2018	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11204-33	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The 2021 Comments expressed concerns about how the proposed Project would impact future wildfire suppression efforts, particularly with respect to reduced air tanker use in the vicinity of 545 foot or taller wind turbines and opined that reduced air tanker effectiveness implicates the likelihood of larger wildfires in the future within the Star Lake Allotment due to inefficient or ineffective wildfire suppression (2021 Comments, pg. 18). The 2021 Comments asked if the applicant (MVE) is going to pay for the temporary loss of AUMs due to future wildfire impacts related to the proposed Project (2021 Comments, pg. 18). The DEIS addressed this issue in some detail. However, after briefly discussing the potential for the proposed Project to impact the use of air tankers in future fire suppression efforts, the DEIS appears to trivialize or brush aside this concern and does not even mention the concern in its summary of Alternative B impacts related to wildfire. The DEIS summarizes its analysis of Fire and Fuels management under Alternative B as follows: Project infrastructure in the analysis area would result in increased fragmentation of the landscape and break up fuel continuity, potentially reducing the potential for large fire spread; however, it could also result in increased ignitions. This could lead to a higher number of small fires and could increase fire resource response regardless of the size the ignitions grow to. The additional road development could, however, increase access for responders, reducing initial response times by fire agencies and increasing potential for fires to be contained at a smaller size. Increased anthropogenic activity that leads to ignitions sometimes occurs outside peak fire season in a geographic area. Project ground disturbance could increase the likelihood of introduction and spread of nonnative plants, which are a fuel source; however, mitigation measures would reduce this possibility. DEIS, pg. 3-252. The DEIS then reports in Table 3.7-1 (Summary of Impacts to Fire and Fuels Management by Action Alternative) anticipated differences regarding wildfire impacts for each action alternative by ranking the alternatives from those that would be most impacted to those that would be least impacted (DEIS, pgs. 3-252 & 3-253). Only the "Acres of changes to vegetation types, fuel types, or fuel loading" indicator reported in Table 3.7-1 quantifies the potential wildfire impacts in any way. With respect to the "Changes to navigable airspace" indicator, DEIS Table 3.7-1 merely reports that Alternative B	Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See response to comment 1042-30 (Table A-3i, Fire and Fuels Management) for additional analysis added to EIS Section 3.7.

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		would be “Most impacted due to the largest project footprint” and that the other action alternatives would be somewhat less impacted due to their associated smaller project footprints (DEIS, pg. 3-253). Earlier, the DEIS admits that “navigation in the area would change for fire responders, and aerial resources could be more limited in their ability to respond due to the presence of turbines and associated infrastructure in the airspace around the siting corridors” (DEIS, pg. 3-251). The DEIS also reports that “FAA regulations do not limit the proximity of aircraft to turbines for fire suppression” and concludes that fire suppression from the air “could occur near project infrastructure at the pilot’s discretion” based upon assessment of “situation-specific risk when flying fire suppression aircraft” (DEIS, pg. 3-251). The DEIS analysis “assumes there would be some reduction in aerial suppression in the analysis area, and aerial suppression that does occur may take longer because flight paths may need to be broken up or require more turns” (DEIS, pg. 3-251). However, the assumed reduction in aerial suppression is not considered important enough to even be mentioned in the DEIS summary statement related to potential wildfire impacts from the proposed Project quoted above and is not quantified in any way in Table 3.7-1 (Summary of Impacts to Fire and Fuels Management by Action Alternative).27 The DEIS admits that the proposed Project “would complicate fire resource allocation decisions because there would be new infrastructure at risk, and decision-makers would need to consider this when prioritizing active fire events which require response resources” (DEIS, pg. 3-251). However, as was the case for potential impacts with respect to the use of air tankers in future fire suppression efforts, the DEIS appears to trivialize or brush aside the concern regarding the potential for the proposed Project to “complicate fire resource allocation decisions” and does not even mention the concern in its summary of Alternative B impacts related to wildfire. On balance, the DEIS appears to emphasize those factors for which the proposed Project would potentially improve or enhance wildfire suppression efforts and appears to trivialize or brush aside those factors for which the proposed Project would potentially hinder or reduce wildfire suppression efforts.	
11226-3	Clare Josaitis	Much of the 'Supporting Rationale' for exempting further analysis of the issues is very nebulous and generalized. Such as "The project would be designed to minimize electromagnetic interference where practical...". First of all, how is it going to be specifically designed to minimize EMFs? Why isn't this explained and layed out for the reader. "Where practical' is essentially meaningless and just a feel-good, catch-all-angles phrase. "Crop dusting operations would not be precluded in the project vicinity...". According to whom? Have you actually talked to Jerome Airport officials? Have you actually asked any local crop duster pilots how the turbines would specifically effect their operations? The rationale states assumptions about reductions in aerial crop dusting, that there could be delays in critical timing of applications, and effects to crop productivity. Given all the tens of thousands of agricultural acres surrounding this project, this should be an issue carried through the EIS. Furthermore, there is absolutely no discussion on how these proposed wind turbines would effect management and operations for the nearby Jerome Airport. This needs to be analyzed in the EIS.	Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). Effects to communication pathways (including electromagnetic interference) are addressed in EIS Section 3.8 (Land Use and Realty). Also see responses to comments 10426-4 (see in Table A-3m, Human Health and Safety) and 11535-105 (see in Table A-3o, Land Use and Realty, including Aviation) regarding interference with communication systems. The project would not significantly impact or reduce the usefulness of the existing overlying FAA airspace, except for within 500 feet of obstructions, and there would be no significant impact to the use of the identified and registered airports in the analysis area. Tall structures, as defined by aviation industry standards, are considered obstructions, and may pose a potential hazard to aircraft conducting aerial operations in their vicinity. The obstructions would not significantly impact or reduce aerial operations in the analysis area, except for the immediate airspace within 500 feet of the obstructions. There are no known agricultural fields or crops that would not be able to be serviced by aerial applicators as a direct result of obstructions being near the fields themselves; however, it is possible that some routes or flight patterns used by aerial applicators while transitioning to and from specific fields may have to be altered to better allow pilots to “see and avoid” obstruction hazards. Aerial applicator flight patterns often vary by type of aircraft, specific crops, and wind direction; therefore, it is not always possible to predict the specific areas that may be impacted.
11273-1	Clare Josaitis	Crop dusting operations would not be precluded in the project vicinity...". According to whom? Have you actually talked to Jerome Airport officials? Have you actually asked any local crop duster pilots how the turbines would specifically effect their operations? The rationale states assumptions about reductions in aerial crop dusting, that there could be delays in critical timing of applications, and effects to crop productivity. Given all the tens of thousands of agricultural acres surrounding this project, this should be an issue carried through the EIS. Furthermore, there is absolutely no discussion on how these proposed wind turbines would effect operations for the nearby Jerome Airport. This needs to be analyzed in the EIS.	See response to comment 11226-3 (see in Table A-o, Land Use and Realty, including Aviation).
11346-4	George Parker, John Arkoosh	The DEIS does not adequately address aviation concerns. Magic Valley airports will be seriously affected by this project according to FAA findings of two 6410 applications filed by Magic Valley Energy. I know that your office is in receipt of these documents so I will not submit them here. Aerial agricultural application, firefighting and predator control will be negatively impacted by this project. Turbines will cause hazards to private pilots as well as local charters services. IFR approaches to local airports will be raised and communications equipment may be affected according to preliminary FAA reports.	See responses to comments 11226-3, 11535-96, and 11481-3 (all in Table A-3o, Land Use and Realty, including Aviation).
11396-5	Gina Jerke	Has the BLM considered the impact to the Jerome County Airport? Is it safe and feasible to have so many turbines that close in proximity to the airport?	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
11481-3	Idaho Wool Growers Association	With height restrictions around the wind turbines, it would make utilizing aircraft nearly impossible for predator control or fire suppression. Sheep producers utilize aircraft to remove harmful predators such as coyotes who prey on young lambs. This option has helped prevent death loss. If this option were to be removed,	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).

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		compensation should be reviewed for the producers as they would likely assume more death loss. Finally, if aerial movement in the area is removed or severely hampered, it would limit fire suppression as a tool fight fires in the area, therefore creating more fire risk.	Tall structures, as defined by aviation industry standards, are considered obstructions and may pose a potential hazard to aircraft conducting aerial operations in their vicinity. The obstructions would not significantly impact or reduce aerial operations in the analysis area, except for the immediate airspace within 500 feet of the obstructions. The use of small aircraft for livestock predator control was added to new Aviation section (3.8.2) and the Grazing Allotments and Range Socioeconomic section (3.9.1) refers back to this aviation analysis. Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management) for additional analysis added to EIS Section 3.7 (Fire and Fuels Management).
11535-90	Steven Andersen	Airspace Interference The DEIS simply concludes that because the development would have to meet FAA criteria, no adverse impacts to aviation would be expected. It similarly concludes that because the distance between the siting corridors and county and municipal airspace is between 6 and 16 miles, no impacts are expected. In reality, no decisions have been made with reference to siting, making the agency's analysis of this issue (like nearly every issue addressed in the DEIS impacted by the location of the turbines) arbitrary and inadequate.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11535-91	Steven Andersen	In fact, the 7460-2 Form the developer submitted to the FAA in 2021 was later withdrawn when the FAA released unfavorable findings. Even on the current FAA website under the new aeronautical study resubmitted by the developer, in response to "Description of Proposal", it reads, "Filing new locations on wind array. In addition to termination of prior studies, please terminate 2021-WTW-2128-OE." The FAA is directed to issue a Determination of No Hazard to Air Navigation "when the aeronautical study concludes that the proposed construction ... will exceed an obstruction standard but would not have a substantial aeronautical impact to air navigation,"279 or when "a proposed structure does not exceed any of the obstruction standards and would not be a hazard to air navigation." Here, the FAA has determined that the proposal – to construct 509 Wind Turbines to a height of 660 feet above ground level and into Class E airspace – clearly exceeds obstruction standard Part 77. 281 Specifically, the FAA concluded the proposed wind farm would extend into airspace used for flight and have an adverse effect upon air navigation.282 In addition to violating federal aviation standards, the proposed project proposes aviation hazards in violation of I.C. 21-502. As articulated in the Idaho Transportation Department's (ITD) letter to Mr. Prestwich on March 23, 2023, the Idaho Division of Aeronautics "determined the windmills to be an aviation hazard contrary to public interest."283 Specifically, the ITD Aeronautics division found "the installation of the proposed structures will be a hazard to both VFR air navigation and all air traffic operations in the area." The FAA's related aeronautical study (No. 2022-WTW-4666-OE) is still in process.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 9216-2 (see in Table A-3o, Land Use and Realty, including Aviation).
11535-92	Steven Andersen	The DEIS provides no evaluation of the impacts to climb gradients for proposed departure routes. Summer months are times of high flight traffic when weather conditions can change rapidly, from clear skies and unlimited visibility to total obscuration and little visibility, requiring aircrafts to descend. Requiring VFR traffic to circumnavigate the massive high volume of turbines would pose significant problems to pilots already facing conflicting obligations to descend to avoid clouds. It is not only an issue of maintaining the correct altitude but a fundamental issue of safety. The impact of the height of 500+ massive structures protruding into Class E airspace will negatively impact the safety of instrument approaches, transitions and enroute segments for all ways into airports in the Magic Valley including Jerome, Gooding, Burley, Twin Falls, and Sun Valley.288 Pilots must account for the time and distance to climb to altitude after takeoff or descend for a landing, and it is critical for an approach and departure corridor to be clear of obstructions to accommodate flight procedures.289 By modifying VFR traffic, the Project would indirectly impact use of regional airways by forcing lower altitude VFR traffic into, or below those airways. This compression would force the rerouting of aircrafts into narrow, concentrated flight corridors, reducing air traffic dispersion and reducing altitude separation for opposite direction traffic.290 This would overload an already overburdened IFR system.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 9216-2 (see in Table A-3o, Land Use and Realty, including Aviation), and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to airports in the analysis area is discussed in Section 3.8.2 (Aviation). The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport and Sun Valley are located outside of the aviation analysis area.
11535-93	Steven Andersen	There is also no indication that MVE made any effort to reach out to the impacted counties regarding aviation impacts or to seek compliance with county aviation plans. It should be noted that in 2007 a comprehensive plan was implemented for Jerome and Hazelton airports that required any proposed development within a 20-mile radius from Jerome and 16 miles from Hazelton to go through Jerome County for approval. This never occurred.	The system of public lands managed by the BLM are not under the jurisdiction of County Planning and Zoning laws and regulations. The BLM considers State and local plans in the preparation of land use plans to ensure there is consistency to the maximum extent as allowable under other laws and fulfilling the purpose of FLPMA. This, however, does not mean that an applicant requesting the use of public lands is required to obtain a permit from the county as there is not development proposed on private property within the jurisdiction of the local government. The County Commissioners from Lincoln, Jerome, and Minidoka Counties have been coordinated with as cooperating agencies throughout preparation of the EIS. As a local agency with jurisdiction by law over adjacent private lands a memorandum of understanding was entered into outlining the counties responsibilities for adjudicating the proposed action and alternatives with local planning and zoning ordinances. During administrative internal reviews of the EIS, the counties did not provide information regarding non-conformance with local planning and zoning ordinances. MVE has submitted project information to the FAA and has coordinated with them on the evaluation of the project. The FAA provided an initial review and a Notice of Preliminary Findings. The FAA will review public feedback and will make a final determination. The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 of the EIS for the detailed aviation analysis.

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11535-95	Steven Andersen	Proposed mitigation of lighting up the turbines is inadequate and poses additional visual disturbance to wildlife and individuals nearby and importantly, pilots trying to fly. It is known that such lights create a strobe light effect. Pilots are cautioned of the extreme risk of vertigo and associated disorientation caused by these lights.292 As a result, the FAA cautions pilots that strobe lights installed on aircrafts should be turned off in reduced visibility conditions (exactly when the DEIS proposes that such mitigating lights be turned on) as the strobe lights light up the entire area surrounding the plane, like lightning in a cloud, and are disorienting for a pilot.293 One or more lights – let alone hundreds of flashing lights from wind turbines in the airspace – would certainly pose a serious danger to pilots, and yet, none of this has been evaluated or even mentioned in the DEIS.	See response to comment 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation). The FAA is the federal agency charged with approving the ADLS system.
11535-96	Steven Andersen	Adverse Impacts on Radar In addition to serving as an obstruction in air space, the wind turbines also have the high potential to interfere with communication, navigation and wind patterns for all aircrafts. Here, aviation over the proposed project area and alternatives has not been adequately studied in the DEIS. There is no radar guidance available the Jerome, Gooding, Burley and Twin Falls airports so all pilots are reliant on GPS to guide them safely into the airport.306 A single wind turbine could cause electromagnetic interference, impacting the accuracy of that GPS, and this project is proposing over 500. It is arbitrary and reckless for the DEIS to evaluate a single tower in Dietrich (with a yet to be determined generator) and conclude based on that, that there won't be significant interference caused by a project of around 500 massive turbines in locations that have not even been determined. The DEIS simply defers to the FAA, and the FAA has confirmed they cannot ensure the Project would not interfere with radar communications or other forms of communications.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Effects to communication pathways (including electromagnetic interference) are addressed in EIS Section 3.8 (Land Use and Realty). Further, the FAA study will consider potential effects to radar and electromagnetic interference. Also see responses to comment 10426-4 (see in Table A-3m, Human Health and Safety) and comment 11535-105 (see in Table A-3o, Land Use and Realty, including Aviation) regarding Interference with communication systems.
11535-97	Steven Andersen	A long-term study taking into account aviation patterns, including congested periods, particularly given farming patterns and crop dusting, and weather patterns – all of which impact the altitude of flight paths, ascension and descension of an aircraft – should be conducted. If regularly-occurring flights would be forced to change course and/or altitude if the Project proceeds, there will be significant impacts to local pilots and farmers who need crop dusting for their crops to survive, and in turn, to sustain their livelihoods.308 If airways are restricted due to the structures, how does this rerouting impact air traffic flow? What is the impact to efficiency and cost? The DEIS provides no analysis of the safety risks posed by the turbines, of how the turbines would affect VFR flights in periods of low visibility and poor weather, or how the route and altitude diversion caused by the Turbines would affect other traffic in the area. Although the DEIS defers to the FAA on these critical issues that impact several other factors in the NEPA evaluation process (including socioeconomics, health and safety, wildfires, wildlife, etc.), ultimately, the FAA does not have the authority to halt the construction of the wind turbines – it only has authority over the air space. Therefore, if after construction, the FAA cannot ensure safety, it will halt impacted air traffic. The relevant airspace and airports are important regional assets contributing to area economic stability and growth. Due to the flight restrictions in this area, including arrivals and departures, local airports would effectively be put out of business, and businesses that rely on local aviation would suffer economic consequences. Farmers rely on crop sprayers to maintain the health of their fields and communities rely on planes fighting fires to protect their land. Mitigation efforts such as blinking lights to warn aircrafts pose safety risks to pilots, as outlined above, and have not been adequately explored given the magnitude of the project. There should be in depth studies as to the effects of the project on the operation of navigation facilities and the safe and efficient use of the airspace with specific hazard determinations as to the impact of the turbines on air navigation and the effect on local radar facilities.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation).
11547-4	Lowell Ihler, Carol Ihler	4. The aviation in the area will be affected especially the crop dusting and fire fighting planes in the area near the wind turbines. Also, the Jerome airport was not mentioned in the DEIS and this was a huge oversight in DEIS. This would affect the landing of planes at Jerome especially in bad weather. It also would affect other smaller airports in communities surrounding the wind turbine area.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11554-11	Raul Labrador; Idaho Attorney General's Office	Beyond this, the Project would create a significantly greater risk for aviation safety.8 A 2014 Special Investigation Report by the National Transportation Safety Board concluded that windfarm towers pose a critical hazard to agricultural planes and other low-flying aircraft.9 And MVE's own planning documents note that there are at least eight small Idaho airports within the Project's vicinity.10 Aviation disasters will inevitably increase, and that increase implicates Idaho's resources and harms the environment. Idaho will have to send first responders to address crashes. Any crashes will fall on Idaho soil, endangering Idaho's animals and people. And the fire, fuel, and debris damage caused by aviation crashes will irreversibly harm the environment. For similar reasons, the Project would harmfully impact local economies dependent on the aviation industry. According to the 2020 Idaho Airport Economic Impact Analysis Update, the nearby Jerome County airport alone was responsible for 51 jobs, $2.33 million in earnings, $4.16 million in gross domestic product, and $9.1 million in economic output.11 If Lava Ridge reduces navigable airspace, local airports like this will suffer, causing job loss and economic harm. The economic harm to Jerome is just one example of the draft EIS's failure to consider direct economic and social harms caused by the Project. See DEIS at 3-264–71.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The aviation analysis in the final EIS Section 3.8.2.2 discloses the potential for economic impacts related to aviation resources in the analysis area. Based on the analysis of the preliminary FAA study results, aviation uses in the analysis area, and the probable effects to airspace and airports, no quantifiable or significant economic impacts to aviation are anticipated.
11615-5	Spencer Dixon	The EIS does not adequately address aviation and crop dusting either	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation), and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation). Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1) and to analyze how they might be affected by the project (see Section 3.8.2.2).

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11667-6	Alisa Bowman	Concern: Impact Firefighting Efforts Southern Idaho is known for summer brush fires. The ability to use aerial fire suppression is instrumental in being able to control the path of the fire. With 740 towers dotted all over the landscape, there would no longer be an option to use aerial application of fire retardant to the wildfires. It would take longer to fight these fires and the damage and area impacted would be higher.	Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management) for additional analysis added to EIS Section 3.7 (Fire and Fuels Management).
11785-1	Jake Arkoosh	My name is Jake Arkoosh. I am a private pilot and I run cattle on the star lake allotment. I fly my personal aircraft every year to locate and check on my cattle in and around the star lake allotment every year. The construction of the proposed project will make general aviation for the purpose of locating and identifying animals in the star lake area impossible. This has not been adequately addressed in the DEIS. Furthermore, general aviation in and around the area and in the area of the Jerome airport will we substantially more hazardous, especially at the lower altitudes general aviation, ag, and firefighting pilots typically fly. 740 foot tall windmills will be only 260 feet below airport pattern altitude. These obstacles will erode my ability to exercise my right to fly and take away aviation as a crucial tool I use to manage my cattle. These issues have not been adequately addressed in the DEIS.	Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1) and to analyze how they might be affected by the project (see Section 3.8.2.2). As described in Section 3.8.2.2 (Aviation) the project would not significantly impact or reduce the usefulness of the existing overlying FAA airspace, except for within 500 feet of obstructions, and there would be no significant impact to the use of the identified and registered airports in the analysis area. Pilot operations would be similar to other navigation hazards occurring within the analysis area from existing tall infrastructure, including transmission towers, communication towers, and met towers. Pilots operating under VFR in the associated Class E and Class G airspace in the analysis area would still be required to navigate using the “see and avoid” concept around the turbines or other obstructions (transmission towers or met towers). Regarding commenters stated flights in the Star Lake allotment, the project would not preclude flights in the Star Lake allotment, except for within 500 feet of obstructions as stated above. Specific low-altitude flight paths may need to be altered to avoid obstructions, but flights within the Star Lake allotment would still be feasible. Refer to the analysis area figure in Section 3.9 (Livestock Grazing) for a map showing the siting corridor overlap with the Star Lake allotment for each action alternative. Of the action alternatives, Alternative E and the Preferred Alternative would have the least siting corridor overlap with the Star Lake allotment (approximately 1/3 of the allotment).
11836-1	Red Baron Ag Service Inc.	To aerially apply crop protect products as low as 10 feet, safety becomes of upmost concern. With the proposed windmill heights of up to 740 feet, our safety is put into jeopardy. We provide crop care on farm land right beside the proposed project. Some of the fields we protect would have these windmills right in front of the aircraft. To start a field, the aircraft are heavy and require some room to be able to turn around. This may take over 2 miles to accomplish. Another thing to keep in mind, if the aircraft has to fly above the windmills to enter a field, some distance is needed. For example; at 250 feet above a 740 foot windmill the aircraft would need to drop almost 1000 feet to begin applying. Imagine trying to do that fully loaded or not within just 1 mile of distance. As stated before, the aircraft need some room to be able to do our job safely. Another safety concern is being able to fly safely to many of the fields from various airports. In an emergency situation, currently flying over the desert isn’t nearly as concerning as fly over these very tall obstacles. Turbulence created by the huge size and massive amount of windmills in this proposed project will not only bring safety in concern, but also cause problems in application timing and effectiveness. Flying in the dark over tall windmills with the lights only at the generator level and not at the blade height is a safety hazard too. Red Baron operates out of public and private airports. Two of the private airports are very close to the proposed project. One is only ½ mile away, and the other is about 2 miles away. This presents yet another safety concern. Included is a map and GPS coordinates of our 2 private agricultural airports near the proposed wind project. The proposed Lava Ridge EIS does not include any Aerial Application comments. As an aviation business, Red Baron Ag Service, Inc. would like to see Aerial Application operating hazards be part of the decision making process.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation), and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation).
11855-2	Mark Doerr	In particular, I oppose the project due to the potential impact it will have on our business at the Jerome County Airport and aviation safety in the airport area in general. Based on the 2020 Idaho Airport Economic Impact Analysis, the Jerome County Airport was responsible for over 50 jobs, $2.33 Million in earnings, $4.16 million in gross domestic product and $9.1million economic output. The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: • Effect of electromagnetic interference on the accuracy of GPS signals used for instrument approaches into the Jerome, Gooding, Burley and Twin Falls airports. This should reflect not only single tower effect but also a cluster of 500 towers. • Impact of electromagnetic interference of 500 clustered wind turbines on GPS signals used by agricultural aircraft and agricultural equipment.	See responses to comments 11226-3 and 11535-96 (see both in Table A-3o, Land Use and Realty, including Aviation).
11855-3	Mark Doerr	The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: [...] Impact of tower height on all instrument approaches, transitions and enroute segments of airways for all airports in the Magic Valley.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11855-4	Mark Doerr	The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: [...] Impact of electromagnetic interference of 500 turbines on aviation, emergency and law enforcement communications in the Magic Valley.	See responses to comments 11226-3 and 11535-96 (see both in Table A-3o, Land Use and Realty, including Aviation).
11855-6	Mark Doerr	The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: [...] Impact of the strobe light effect of 500 blinking towers on vertigo for pilots flying at night or in obscured, reduced	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 7337-1 (in Table A-3o, Land Use and Realty, including Aviation).

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		visibility conditions. The FAA requires strobe lights installed on aircraft to be turned off in these types of conditions because it will cause vertigo. Will the turbines have the same effect.	
11855-7	Mark Doerr	The published DEIS only lightly touched on the issues surrounding aviation; lighting of the towers and communication. There needs to be far more study on the effects of the project on the following issues: [...] Impact of the height of the towers protruding into the Class E airspace surrounding the Jerome, Gooding, Burley, and Twin Falls Airspace in addition to the Class E airspace on the transitions into and out of the Sun Valley Airports. If the airspace is violated by tower height, will this impact the safety of the instrument approaches into all of the listed airports. [...] Federal Class E airspace, which is the type of airspace surrounding the Magic Valley area, starts at 700 feet above the ground. The FAA will always oppose any tower taller than 700 feet because those towers are in controlled airspace. That 700 floor of the airspace is designed to protect aircraft that are flying in the clouds and flying instrument approaches into, in this case, Jerome. Additionally, the airspace within 2 to 4 miles either side of the centerline of an instrument approach or transition to the instrument approach is considered protected airspace and no towers can protrude into that airspace. If it does, then the FAA has to change the minimum altitudes on those approaches and transitions because TERPS, which is the regulation that controls the designing of these transitions and approaches, does not allow the aircraft to be any closer than 1000 feet above and obstructions around that protected airspace.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 9216-2 (see in Table A-3o, Land Use and Realty, including Aviation), and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to airports in the analysis area is discussed in Section 3.8.2 (Aviation). The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport and Sun Valley are located outside of the aviation analysis area.
11855-8	Mark Doerr	It is an issue to build towers in these areas. What is proposed for towers east of the Jerome airport will affect and ultimately change the instrument approaches into these airports. That is why the FAA recommended not building the towers. NEPA requires the BLM to consider the economic impact to airports, counties and businesses. No construction should be allowed to start until all of these issues are vetted by the FAA. Further, there was no inclusion of the FAA findings in the DEIS. This information must be addressed in the final EIS.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
11869-16	Raul Labrador, Josh Turner; Idaho Attorney General's Office	[The draft EIS Ignores Idaho's Sovereign Interest in its People.] Beyond this, the Project would create a significantly greater risk for aviation safety.8 A 2014 Special Investigation Report by the National Transportation Safety Board concluded that windfarm towers pose a critical hazard to agricultural planes and other low-flying aircraft.9 And MVE's own planning documents note that there are at least eight small Idaho airports within the Project's vicinity.10 Aviation disasters will inevitably increase, and that increase implicates Idaho's resources and harms the environment. Idaho will have to send first responders to address crashes. Any crashes will fall on Idaho soil, endangering Idaho's animals and people. And the fire, fuel, and debris damage caused by aviation crashes will irreversibly harm the environment. For similar reasons, the Project would harmfully impact local economies dependent on the aviation industry. According to the 2020 Idaho Airport Economic Impact Analysis Update, the nearby Jerome County airport alone was responsible for 51 jobs, $2.33 million in earnings, $4.16 million in gross domestic product, and $9.1 million in economic output.11 If Lava Ridge reduces navigable airspace, local airports like this will suffer, causing job loss and economic harm. The economic harm to Jerome is just one example of the draft EIS's failure to consider direct economic and social harms caused by the Project. See DEIS at 3-264–71.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11901-1	Bucky Whittier	We are writing to strongly object to the Lava Ridge Wind Turbine project. My wife and I are pilots, located at the Twin Falls, Magic Valley Airport. We used to keep our plane at the Jerome Airport. Flying anywhere near the wind turbines that are already located near Hagerman or Pocatello, is dangerous. Hearing that the issues regarding flying Instrument will be adversely affected with no solution given is just insane. If it might impact General Aviation pilots how in the world are Life Support, Fire Suppression, Rescue or other area safety flight planes supposed to operate? If thought has been given to these issues it appears that no care has been given to deal with these issues. Also, the night lights on the existing turbines are obnoxious already. Flashing red lights all synchronized, all night long--what a lovely sight! How will any pilots, General Aviation or otherwise, be able to fly at night safely? it appears no one cares. This is such a safety issue. We surely hope that a decision is made that no, zero, turbines will be approved, ever, forever in perpetuity for the beautiful State of Idaho.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).
11909-3	Kevin Trainor	I guess my biggest reason for objecting is the SIZE and its hazard to flight operations. It will be like having a SERIES of 70 story buildings running generally north/south over almost 200,000 acres off the approach end of the most utilized runway at the Jerome airport. The prevailing winds in the area are out of the west, so Runway 27 is the most used runway. The corridors will be PERPENDICULAR to the direction of flight. There is already an antenna farm less than 1.5 mile west and less than 1/2 mile north of the touchdown area of R27. Right hand downwind approaches to R27 are dangerous and strongly discouraged by the Idaho Dept of Aeronautics and the FAA. From the EIS maps the majority of the structures will be south of the R 27 extended centerline.The height of the blades will over 700 ft AGL at the top of their arc. The height of the tower is over 500 ft. AGL This means that hazard to navigation lights on the towers will necessarily be about 250ft BELOW the hazard. All of this steel/aluminum/fiberglass will be in corridors that run perpendicular to R 27.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
11943-2	Mary Kevan	They are hazardous to air traffic because of their height and turbulence. They will alter flight patterns for local airports.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11968-5	Cheryl Sandy	Small aircraft would be difficult to maneuver through these towers.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
12057-2	A. Ben Crouch	1. The Jerome County Airport board is gravely concerned about how it would affect the airport. The 400 75-story windmills would greatly affect the approach and departures from the airport, not to mention the surrounding	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in

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		airports as well. Concern has been expressed about instrument interference from the electromagnetic pulses from the wind turbines. Blinking red lights from the 400 plus windmills and low cloud coverage have been cited as just a few ways of causing flight accidents or tragedies, and The FAA has expressed that they should not be built, and that it will not only affect our airport but will also greatly affect all of the other surrounding airports as well. The potential harm and effects of these windmills will have economic and financial consequences for our airport, as a whole, and to the individual stakeholders and owners that operate there as well. It will be detrimental to business at the Jerome County Airport – and no studies have been done to assess all of the potential issues.	general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
12232-2	Juli Miller	Finally, as a pilot, the impacts on the small rural and back country airports for which Idaho is known will change the character of this part of Idaho and create harmful economic impacts for Idaho.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
12233-3	Elizabeth Lampert	The Project will impede air traffic at the Jerome Airport. Crop dusters may have to move operations to a different location. Planes needed to combat forest fires may not be able to fly safely around these wind turbine towers.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1042-30 (in Table A-3i, Fire and Fuels Management). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
12307-18	Dean Dimond	Need new information regarding height of towers and effects on maintenance drones and other aircraft,	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
12351-3	Julie C. Lynn	The wind turbines would hamper fighting wildfires and ot er aircraft flying in the area.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See response to comment 1042-30 (in Table A-3i, Fire and Fuels Management) for additional analysis added to EIS Section 3.7 (Fire and Fuels Management).
12798-1	Florian Ghighina, Jennifer Schildgen; Idaho Transportation Department	We have received your email and information request regarding the Lava Ridge Wind Project. Based on all the information presented and with the authority of the Idaho Code 21-513 through 21-520 and Idaho Transportation Rule No. 39.04.08, the Division of Aeronautics has performed an obstruction evaluation for the proposed project identified above, and has determined that the wind turbines development will be a hazard to air navigation and air traffic operations in the area. The 660' tall wind turbines will negatively affect and degrade the safe and efficient use of airspace by aircraft. The proposed height of the windmills would extend into the Visual Flight Rules (VFR) airspace, which would have an adverse effect on VFR navigation and a tremendous negative impact on the safety of air operations for the airports located in and around the same region. The Division of Aeronautics strongly opposes the construction of the proposed wind turbines out of concern for the safety of air operations for ag sprayers, fire fighting aircraft and the general aviation pilots that use, need to use, or would want to use the airports within that region.	Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). MVE filed a Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA for Alternative B with a maximum turbine height of 660 feet above ground level (AGL) (approximately 4,933 feet amsl). The FAA issued a Notice of Presumed Hazard (NPH) on February 2, 2023, which initiated an FAA public comment period and aeronautical study (FAA 2023a [Aeronautical Study No. 2022-WTW-4666-OE]). The comment period closed on March 11, 2023. As part of the NPH, the FAA public notice contained a preliminary list of detailed impacts that would result in exceeding current federal obstruction standards (as per 14 CFR 77.17 (a)(1) and (3)) and the other effects on aeronautical operations (as per 14 CFR 77.29 (a)(1)). The FAA aeronautical study is underway, and results of the final study were not available at the time of EIS publication. The analysis contained in the EIS references the preliminary analysis that was disclosed in the FAA public notice. The commenter did not provide any supplemental information or studies to include in the analysis.
12901-1	Cheryl Savello	They also say that the turbines light up when aircraft are landing and taking off at the Jerome air field. So what if the sensors fail. Crop dusters are just one of the concerns. Do the sensors light up during the day? Are the people maintaining the systems outside contractors of local people?	See response to comment 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).
12916-4	Gina Jerke	Has the BLM considered the impact to the Jerome County Airport? Is it safe and feasible to have so many turbines that close in proximity to the airport?	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
12927-5	John Arkoosh	The DEIS does not adequately address aviation concerns. Magic Valley airports will be seriously affected by this project according to FAA findings of two 6410 applications filed by Magic Valley Energy. I know that your office is in receipt of these documents so I will not submit them here. Aerial agricultural application, firefighting and predator control will be negatively impacted by this project. Turbines will cause hazards to private pilots as well as local charters services. IFR approaches to local airports will be raised and communications equipment may be affected according to preliminary FAA reports.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 11481-3 (see in Table A-3o, Land Use and Realty, including Aviation). Effects to communication pathways (including electromagnetic interference) are addressed in EIS Section 3.8 (Land Use and Realty). Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See responses to comments 10426-4 (see in Table A-3m, Human Health and Safety) and 11535-105 (see in Table A-3o, Land Use and Realty, including Aviation) regarding interference with communication systems.
12949-3	Ralph Kincheloe, Connie Kincheloe	Aviation has not been addressed in the DEIS. ... These wind turbines would have an effect on our ability to fly safely because of the known adverse effects recognized by the FAA. It is a given that these turbines would affect both class G and E airspace, which is used for separation between and IFR and VFR traffic to conduct safe approaches and departures. We could lose our controlled airspace due to the protrusion of wind turbines In a recent meeting between the Bureau of Land Management and the Jerome County Airport Advisory Board, a discussion arose about the cluster of wind turbines proposed in the Lava Ridge area. We have researched, and while there may be areas around the country that contain anywhere from 100 to as many as 350, these turbines are not nearly as tall as these proposed by Magic Valley Energy; they also do not appear to be close to any airport. While Magic Valley Energy has proposed turbines as tall as 740', we do not know the size of these yet-to-be-determined wind turbines and therefore it is impossible to know what the cumulative effect will be. According to the USGS wind mapping program, the tallest wind turbines in service now do not exceed 615'. https://eerscmap.usgs.gov/uswtdb/viewer/#5.74/36.902/-94.235/0/1 Navigation, communication, and gps are an	See responses to comments 11226-3 and 11535-96 (see both in Table A-3o, Land Use and Realty, including Aviation).

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		integral part of aviation. In the aviation world, it is of utmost importance to be heard and seen. While flying, we can hear of aircraft in the vicinity before we ever see them. Radio communications are a large part of avoidance of mid-air collisions along with gps transponders. It is a known fact that wind turbines produce electromagnetic interference. What is not known is what effect a cluster of 300-400 wind turbines will have on all avionics. The worst scenario would be flying IFR and losing gps navigation that could lead to loss of life and property for both those in the air and those on the ground. https://www.researchgate.net/figure/3D-representation-of-the-RCS-of-the-wind-turbine-at-1300MHz-applying MoM_fig15_258390079 The alternative lighting solution proposed by Magic Valley Energy only has a 95% efficacy. We don't want to risk our lives, our property or anyone else's life on a failure, even if it is 5%.	
12956-1	Ralph Kincheloe, John Higley, John Toolson, Albert Lockwood, Gary Oliver; Darrell Fairbanks, Tom Peters	We write to you of our concerns that the Lava Ridge Project may potentially harm the aviation communities of Jerome and Hazelton and other airports located in the Magic Valley. The DEIS does not thoroughly address the impacts this project will have on aviation. The Jerome County Airport Advisory Board (Board) oversees both the Jerome County Airport and the Hazelton Municipal Airport. The aviation industry has had a boon as of late due to the central location of our Jerome airport. In 2011, the Board and the Airport Manager at the time, received special recognition by the Federal Aviation Administration for its foresight as a premier airport. (Please see a copy of The Transporter article attached.) In 2019, the Board began revisions to the Jerome Master Plan (a copy which has already been submitted via a RAC subcommittee meeting) to address the needs and demands for the present and future airport operations. Through this analysis, our airport operations have justified the lengthening of our existing 5000' runway to 6500' to accommodate the larger jet traffic that is currently using our facility as well as to draw in new businesses that are waiting for the expansion. The Jerome Master Plan was developed with the Federal Aviation Administration (FAA)'s guidance. Jerome County Airport lies in controlled airspace. This controlled airspace is used for instrument approaches to both runways 09/27. This controlled airspace provides separation for safe operation. (Please see aeronautical maps) According to the FAA's 'Airspace 101', there is no unregulated airspace. Drones can operate in airspace up to 400'. There is 100' of separation between drones and Class G. Aircraft can fly 500' above uncongested (rural) areas and must be 1000' above the surface of congested (city) areas. Class G is the only form of uncontrolled airspace. It is not charted and exists wherever class A, B, C, D or E does not. It starts at the surface and extends up until it hits Class E. For Jerome County Airport, Class G starts at the surface and goes up to 700'. Class E (controlled) airspace starts at 700' at Jerome Airport and extends up to 18,000'. The reason for Class E airspace at 700' is to protect all aircraft on instrument (IFR) approaches and departures. For larger and faster planes, larger and more protective Class E transition areas are necessary. All airspace is navigable airspace. In speaking with the Idaho Division of Aeronautics, they explained the two studies on the turbines by the FAA. Both studies were lumped into a square and a turbine from each study was used to determine that all turbines in the entire project, based on those two, would be hazardous to all navigable airspace. Magic Valley Energy has submitted two sets of 7460-1, Notice of Proposed Construction or Alteration, forms to the FAA. The first set of 7460-1 ASN's were submitted for 740' tall wind turbines. Magic Valley Energy withdrew those studies after the FAA determined that "the structure exceeded obstruction standards and/or would have an adverse physical or electromagnetic interference effect upon navigable airspace or air navigation facilities". In 2022, Magic Valley Energy submitted new 7460-1 forms with revised tower heights of 660' tall wind turbines. A circularization published by the FAA again noted the turbines as penetrating into controlled navigable airspace. While the FAA has yet to release a final determination, a FOIA submitted by a concerned citizen, and submitted herein, shows two responses to the latest 7460-1 forms for wind turbines as still being obstructions and hazards to flight. (Please see FAA OE Study comment submitted letter and FOIA information attached). The Lava Ridge Wind Turbine project encompasses all of the training area for which student pilots learn to fly due to proximity to the Jerome and Hazelton airports as well as being over an uncongested area. This area was set by the FAA. Larger, faster aircraft start transitioning to lower altitudes 120 miles away from their final destination. If the project is constructed, the FAA must readdress our class E airspace. There is grave concern that this will eliminate IFR approaches and departures for both runways for all air traffic. We have worked hard to grow this airport and have spent nearly $4 million in the past four years in preparation for the runway expansion. The Jerome County Airport is now considered a B-11 facility with a 20-year master plan. Ag Tractors use both the Jerome and Hazelton airports. While the Hazelton Municipal Airport is smaller it is no less important and will also be adversely impacted. The runway has been resurfaced and plans for constructing a new paved taxiway are in the works to serve the ag tractors that use the airport. The close proximity of wind turbines to this airport is especially concerning due to the unknown effects of turbulence and/or vortices that are known to be a hazard to flight. We ask that before any decision is made, a thorough investigation also be made regarding the following issues in addition to the concerns we have addressed above: *Effect of electromagnetic interference on the accuracy of GPS for intersections and instrument approaches. The FAA's response to the 7460-1 mentioned electromagnetic interference. What would be the cumulative effect of combining 200 to 400 wind turbines in one geographical area? *Impact of tower height on airspace E for instrument approaches (IFR). The tower height could have an effect upon IFR approaches and possibly eliminate them *Impact of tower height on airspace G for visual flight rules (VFR) *Ice shedding *Strobe effect upon instrument flight (which can cause vertigo). These wind turbines will be required to have 6 red flashing lights per turbine for night time visibility and white flashing lights for daytime visibility *Vortices (AOPA.org) *While the towers require lighting, the blades, which project a minimum of another 240' into the airspace, are unlit, presenting a danger	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation), and 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).

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12956-2	Ralph Kincheloe; John Higley; John Toolson; Albert Lockwood; Gary Oliver; Darrell Fairbanks; Tom Peters	The Jerome County Airport is uniquely positioned to capitalize on growth due to its location at two major highway intersections. Based upon a 2020 Idaho Airport Economic Impact Analysis Update, the Jerome County Airport was responsible for 51 jobs, $2.33 million in earnings; $4.16 million in gross domestic product; and $9.1 million in economic output. These numbers have only continued to grow in the nearly three years since the study was performed. The Lava Ridge Project, while it may employ more during the construction phase, is only touted to employ 20 people. If we lose navigable airspace at either Jerome or Hazelton airports, our airports, our pilots and businesses all lose as well. The airport is much more conducive to employment and an economic impact than the wind turbines will ever be. Chapter 12, Airport Zone, in the Jerome County Comprehensive Plan addresses protection of the Jerome County and Hazelton Airports. Coordination with the Jerome County Government is required through NEPA. The DEIS does not address our county airports adequately. (Attached is a copy the ordinance.)	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The aviation analysis in the final EIS Section 3.8.2.2 (Impacts) discloses the potential for economic impacts related to aviation resources in the analysis area. Based on the analysis of the preliminary FAA study results, aviation uses in the analysis area, and the probable effects to airspace and airports, no quantifiable or significant economic impacts to aviation are anticipated.
13006-36	Leon Smith	Recommend updating the DEIS to include newest FAA ceiling requirement that affects Jerome airport and pilots, acknowledging risk to flights in and out of the airport.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport.
13012-12	Heather Saunders	Speaking of warming, we can't forget to discuss the impact that wind turbines can have on local atmospheric conditions. That impact is unpredictable although the production of wake turbulence is a known quantity. Some of the installations shown on the map are awfully close to private land and ranchers frequently hire crop dusting aircraft to apply fertilizers and other substances to their fields. In order to ensure a complete application the aircraft need to cross the boundaries of the fields. How will the developers ensure that such aircraft are not subjected to wake turbulence from these turbines? Is BLM prepared to control the airspace and ensure accidents don't happen? Is the company prepared to compensate ranchers who may have to find more expensive and labor intensive alternatives to crop dusting? Ranchers are also turning to drone technology to keep eyes on their herds and properties. Wake turbulence from wind turbines can have a devastating effect on a flying drone; it's an invisible phenomena that can destroy the expensive tools used to save time and money by monitoring assets from the air.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
1538-1	Stephanie	I am writing to adamantly oppose the Lava Ridge wind project. LS Power has neglected to obtain FAA approval for the 740' towers they plan to build. They state "following construction of the towers, they will address the concerns issued by the FAA." How would this constitute the project meeting FAA regulations? I sincerely doubt LS Power will dismantle their towers that are deemed "unsafe for aeronautics" near airports in the entire Magic Valley. This includes Jerome, Hazelton, Gooding, Burley, Shoshone and Twin Falls. What is laughable is that LS Power listed on the FAA form Dietrich as the location for this monstrosity of a turbine; the furthest location from the Jerome County airport.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to airports in the analysis area is discussed in Section 3.8.2 (Aviation). The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport is located outside of the aviation analysis area.
2314-2	Mike Tylka	Air Space. We have several airports in the area; Jerome, Hazelton, Burley and Hailey. What effect will this have on local airports? How about crop dusters, that generally fly at altitudes lower than these towers? Private pilots in the area? Life Flight helicopters? Fire suppression aircraft?	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
2852-2	Mike Telford	3. Aviation - & GPS signal concerns have not been considered.	See responses to comments 11226-3 and 11535-96 (see both in Table A-3o, Land Use and Realty, including Aviation).
2878-1	Scott Prow	Site elevations of each turbine5 (and thus the terrain) from the lowest to the highest indicates that Class E Airspace would begin anywhere from 4,653' to 5,709' MSL at any point over the Lava Ridge Project. Any aircraft operating under Visual Flight Rules (VFR)6 flying over the top of the project would be operating within Class E Airspace and will have further operational restrictions as an aircraft is required to remain 500' below any cloud7/ceiling.8 This would mean that the ceiling could be no lower than 5,500' to 6,600' MSL (ceiling of 1,600' AGL±) for daytime operations and 5,700' to 6,800' MSL (ceiling of 1,800' AGL±) at night. All the weather data cited within the EIS appears to focus either solely on wind and temperature data or on wildlife habitat. I was interested in finding tactical weather trends needed in performing my job. I first went to the two weather sources cited in the document.9 Neither of these resources had anything of value for the information I needed. Next, I went to various .gov websites for information and was further unable to find historical cloud ceiling data. Eventually I evaluated the Automated Surface Observing System (ASOS) hourly weather data from the Jerome County Airport (KJER) as it is the closest legal aviation weather reporting station to The Lava Ridge Project. I evaluated the period between 15 December and 31 March,10 starting in 2013 to present. Any visibility less than 3 miles I discounted (as this is the minimum required visibility for VFR flight). I discounted ceilings of more than 1,800' (as I have shown this would be our minimum ceiling to fly at night over the project). For each year evaluated I looked at how many periods were below the 1,800' minimum ceiling which is required to fly. Some of these periods within the calendar day were short (one hour) but some were quite lengthy (half the calendar day).11 My conclusion is that there will be an additional 28.7 periods-of-time, some short and some long, within the calendar day that will further preclude flying during the winter months inside the project's area.12 The following are two very realistic scenarios and are something that HAA crews perform regularly. Firstly, I examine an interfacility transfer. A crew may need to fly a patient from one of the hospitals in Burley or Rupert to a higher level of care in the Boise area. I have already discussed that in the event of "low" weather a HAA crew will be unable to fly a direct course over the top of the wind project. In this event one would most likely divert their flight	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). As described in Section 3.8.2.2, the project would not significantly impact or reduce the usefulness of the existing overlying FAA airspace, except for within 500 feet of obstructions, and there would be no significant impact to the use of the identified and registered airports in the analysis area. Pilot operations would be similar to other navigation hazards occurring within the analysis area from existing tall infrastructure, including transmission towers, communication towers, and met towers. Pilots operating under VFR in the associated Class E and Class G airspace in the analysis area would still be required to navigate using the “see and avoid” concept around the turbines or other obstructions (transmission towers or met towers).

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		path to the south, vicinity Eden. Realistically this would not add more than two minutes to the enroute time depending on the winds. But considering some of the patients that are transferred and the reason, even a minute can count. For a stroke, time is brain. For the heart, time is heart muscle. And there obviously can be various other reasons when time really matters. Secondly, I examine a scene call. Interstate 84 is on the south side of the project. U.S. 93 is on the east side and State Highway 24 on the north. People live, work, travel, and recreate in and around every side of the wind project. There will be injuries and illnesses from all points. Again, if a pilot is operating with low ceilings, they will be forced to circumnavigate the wind turbines. Depending on where the patient is picked up and where the receiving facility is located a pilot may be required to add an additional 6 to 7 minutes of flight time to the time enroute depending on winds and the speed of the aircraft. I have already discussed how minutes can sometimes truly determine the outcome of the patient. This facet of the aviation sector was not discussed in the EIS. I hope that I was able to clearly articulate how weather and terrain/obstacles all must be evaluated before accepting and continuing a flight particularly in the Helicopter Air Ambulance setting. Not to sound cliche, but over the years I have seen how minutes can really affect the outcome of a patient-either negatively or positively.	
3224-1	Scott Prow	I have been a Helicopter Air Ambulance (HAA) Pilot in the Magic Valley since 2007. I am employed by Intermountain Health flying from the Cassia Regional Hospital in Burley, and I Previously flew for Air St Luke's from the Magic Valley facility. There are three HAA operators in the Magic Valley: Intermountain Health/Classic Air Medical at the Burley facility, Lifeflight Network at the Burley Airport (KBYI), and Air St Luke's at the St. Luke's Magic Valley facility in Twin Falls. As proposed, virtually the entire area of the Lava Ridge Wind Project, both vertically and horizontally, (Alternatives B through E) lie within a Class E Airspace Area down to 700' Above Ground Level (AGL). Utilizing the 740' structure/blade height that is cited in the Lava Ridge Wind Project Draft Environmental Impact Statement (EIS) a HAA operator would be required to fly at an altitude of 1,040' AGL during the day and 1,240' at night. This would place a helicopter anywhere from 4,993' to 6,049' Mean Sea Level (MSL) during the day or 5,193' to 6,249' MSL at night. Site elevations of each turbine (and thus the terrain) from the lowest to the highest indicates that Class E Airspace would begin anywhere from 4,653' to 5,709' MSL at any point over the Lava Ridge Project. Any aircraft operating under Visual Flight Rules (VFR) flying over the top of the project would be operating within Class E Airspace and will have further operational restrictions as an aircraft is required to remain 500' below any cloud /ceiling. This would mean that the ceiling could be no lower than 5,500' to 6,600' MSL (ceiling of 1,600' AGL +-) for daytime operations and 5,700' to 6,800' MSL (ceiling of 1,800' AGL +-) at night. All the weather data cited within the EIS appears to focus either solely on wind and temperature data or on wildlife habitat. I was interested in finding tactical weather trends needed in performing my job. I first went to the two weather sources cited in the document. Neither of these resources had anything of value for the information I needed. Next, I went to various .gov websites for information and was further unable to find historical cloud ceiling data. Eventually I evaluated the Automated Surface Observing System (ASOS) hourly weather data from the Jerome County Airport (KJER) as it is the closest legal aviation weather reporting station to The Lava Ridge Project. I evaluated the period between 15 December and 31 March, starting in 2013 to present. Any visibility less than 3 miles I discounted (as this is the minimum required visibility for VFR flight). I discounted ceilings of more than 1,800' (as I have shown this would be our minimum ceiling to fly at night over the project). For each year evaluated I looked at how many periods were below the 1,800' minimum ceiling which is required to fly. Some of these periods within the calendar day were short (one hour) but some were quite lengthy (half the calendar day). My conclusion is that there will be an additional 28.7 periods-of-time, some short and some long, within the calendar day that will further preclude flying during the winter months inside the project's area. The following are two very realistic scenarios and are something that HAA crews perform regularly. Firstly, I examine an interfacility transfer. A crew may need to fly a patient from one of the hospitals in Burley or Rupert to a higher level of care in the Boise area. I have already discussed that in the event of "low" weather a HAA crew will be unable to fly a direct course over the top of the wind project. In this event one would most likely divert their flight path to the south, vicinity Eden. Realistically this would not add more than two minutes to the enroute time depending on the winds. But considering some of the patients that are transferred and the reason, even a minute can count. For a stroke, time is brain. For the heart, time is heart muscle. And there obviously can be various other reasons when time really matters. Secondly, I examine a scene call. Interstate 84 is on the south side of the project. U.S. 93 is on the east side and State Highway 24 on the north. People live, work, travel, and recreate in and around every side of the wind project. There will be injuries and illnesses from all points. Again, if a pilot is operating with low ceilings, they will be forced to circumnavigate the wind turbines. Depending on where the patient is picked up and where the receiving facility is located a pilot may be required to add an additional 6 to 7 minutes of flight time to the time enroute depending on winds and the speed of the aircraft. I have already discussed how minutes can sometimes truly determine the outcome of the patient. This facet of the aviation sector was not discussed in the EIS. I hope that I was able to clearly articulate how weather and terrain/obstacles all must be evaluated before accepting and continuing a flight particularly in the Helicopter Air Ambulance setting. Not to sound cliché, but over the years I have seen how minutes can really affect the outcome of a patient—either negatively or positively. I had thought of offering the following opinions for taking into consideration options of how to mitigate the impact to HAA operations: Use only the shorter towers (maximum height of 390') or proceed only with Alternative "A"—No Action. But after rereading the EIS I found an apparent disparity in quoted wind turbine heights. 390' appears to be the height for a 2-MW turbine. The size and height of the turbines proposed for this project are for 3-MW to 6-MW structures. A 3-MW turbine would likely be larger and taller than a 2-MW turbine. Nowhere in the EIS does it speak to the size of a 3-MW turbine. In light of this oversight I cannot know for sure the actual height of a shorter 3-MW turbine and this inconsistency (between	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). As described in Section 3.8.2.2, the project would not significantly impact or reduce the usefulness of the existing overlying FAA airspace, except for within 500 feet of obstructions, and there would be no significant impact to the use of the identified and registered airports in the analysis area. Pilot operations would be similar to other navigation hazards occurring within the analysis area from existing tall infrastructure, including transmission towers, communication towers, and met towers. Pilots operating under VFR in the associated Class E and Class G airspace in the analysis area would still be required to navigate using the "see and avoid" concept around the turbines or other obstructions (transmission towers or met towers).

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		the 2-MW and 3-MW turbines) gives me pause and I question what else in this EIS may be wanting or disingenuous. Because of this I cannot support this project and would propose Alternative “A”—No Action.	
3256-3	Regina Smith	In volume three appendix 3. Issues analyzed in brief. AIB -14. Pg. App3-6. Several topics are touched on but only briefly. Issues analyzed in brief include aerial farm crop application. One paragraph. Yes, it says pilots can fly at their own risk around these hazards. "Pilots would assess situation - specific risk when flying crop-dusting or other small aircraft." MVE assumes there will be some reduction in aerial crop dusting and may affect timely application. This is the pilots' livelihood as well as the farmers depending on this treatment in a timely fashion. MVE mentions that the towers will be lit at night. Crop-dusting doesn't occur at night.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
3340-7	Sue Page	The LRWP will alter the way aerial fire suppression and agricultural applicators perform their duties. The imposition of up to 740 foot tall structures on the landscape will dramatically increase the already inherent danger to the pilots. Who will be liable for the loss of life or limb, should one of these pilots collide with these Godzillas? Will LS Power have to pay for the losses? LS Power plans to install lighting atop the turbines that will only come on when the aircraft sensors detect an oncoming plane. These sensors are a mechanical device that can, and will fail (that’s firearms safety 101 – don’t rely upon the safety to operate 100% of the time-it is a mechanical device that can and will fail, so don’t point your gun at anything you don’t intend to destroy). If the sensors and/or lights fail, who or what will be destroyed? Does the BLM care about Mark or Randy – men that make their living with their aircraft?	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). Regarding turbine marking and lighting, see the response to comment 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).
4220-4	Sue Page	Also, there isn't any study of the affect on aviation. The effects on the radar system, the wake rolling of light aircraft, the effects of crop dusting down wind and even if it can be done safely or at all. Will the wake turbulence affect the fertilizer sprayed?	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
4724-1	Harold Dimond, Carolyn Dimond	Seriously……we are finding more missing information from this DEIS every day. Things that we have already addressed plus now we find out why aviation is not on the study. Somehow initial findings from the FAA form 6740 have disappeared. Strange, isn’t it? Too bad for them that all copies were not destroyed, even though it has been removed from FAA’s database. That must have cost LS Power/MVE a bit, don’t you think?? The initial findings which you probably already know about stated the project should not be built due to the impact on aviation safety and the instrument approaches to the airports in the Magic Valley. Then a new form 6740 was filed but with a lot of information missing and listing only lighting and communications. Now they are saying they will build the towers and then address and work with the FAA knowing full well the FAA cannot do anything about it after the mess is built. Also, in the initial filing the Jerome airport which of course is closest to their “Wind Project” was not even mentioned. Making it so there was no study made on the most important airport. HMMMMM Solution: BLM must have the project’s impacts on area airports and instrument approaches evaluated before ANY permits for construction are issued.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation), 11535-96 (see in Table A-3o, Land Use and Realty, including Aviation), 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation), and 9216-2 (see in Table A-3o, Land Use and Realty, including Aviation).
5313-1	Richard Dinges	I am commenting on the Project Lighting in Appendix 11.3, and to the following paragraphs: "Because the turbines and met towers would exceed heights of 200 feet above ground level, the turbines would be marked or lighted per Federal Aviation Administration (FAA) guidelines and an approved lighting plan to adequately warn aircraft pilots of the obstruction at night. FAA nighttime lighting requirements include the use of red, simultaneously flashing lights positioned on the outer perimeter of the wind energy facility, each spaced no more 0.5 mile from each other(FAA2020). the FAA determines which turbines would require nighttime lights, but it is anticipated that approximately half of the turbines would be marked by red lights, particularly the turbines on the outer perimeter of the project or on high terrain." Next paragraph is skipped " If approved by the FAA, MVE would deploy an ADLS to mitigate the need for continuous operation of the flashing red lights during nighttime hours. An ADLS has one or more elevated radars that scan the region near the project for aircraft and activate the red flashing lights on turbines only when an aircraft is detected within a specified distance. For the project ....." "When ADLS is used, the frequency of "lights on" time is driven by the geographic location of a project and its proximity to low-altitude, nighttime air traffic operations. The area surrounding....." The wording in these paragraphs imply that aircraft will only be approaching the project area from the outer perimeter and at low-altitude. No consideration is being given to an aircraft approaching from a high-altitude in a spiral decent over the project area. Also, no mention is made of what type of radar will be deployed and what its range of detection would be, both vertically and horizontal. A case can be made for an aircraft descending into the project area from above, being detected by the radar, but if all the towers are not lit, collision with a non lit tower could result. With only half of the towers being lit, I believe the probability of a worse case scenario is very high, even if the interior towers on high terrain within the project are lit. Also, emergency landings in the project area have not been considered. Another case that I do not see addressed is daytime flight operations in non-clear-sky weather. Will the airspace above the project area be a no fly zone, or will there be altitude restrictions for both IFR and non-IFR conditions? I look forward to your response. Thank you.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).
5437-1	Richard Dinges	I previously submitted a response to the Lava Ridge Environmental Impact Statement (EIS) regarding lighting of the wind turbines for aircraft avoidance. However there is another issue with the wind turbines that has not been addressed, and that is their radar signature or their electromagnetic reflectivity. This concern has been brought to my attention by a congressional hearing on Thursday, 16 March 2023, in Wildwood, New Jersey called by US Congressman Jefferson Van Drew (R-NJ-02). The press release regarding this hearing is attached to this email. The results of this hearing were reported by Breitbart News on 18 March 2023, and partially appears below:	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation).

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		START A panel of experts testifying to members of Congress at an in-district hearing in Wildwood, New Jersey, on Thursday warned that offshore wind projects actively promoted and subsidized by state and national Democrats could greatly interfere with radar and navigation in the Atlantic Ocean, creating a national security threat. The panel included environmentalists, fishing industry experts, and advocates with working experience at the Department of Energy. Several noted concerns with maritime territory designated for wind farms apparently getting in the way of Pentagon and NASA operations. Another noted that the farms' potential interference with ship radar could damage U.S. Coast Guard activities, including rescue missions. Another concern raised was the possibility of cargo ships, particularly those carrying oil or chemicals, being unable to navigate the seas and colliding, causing an environmental catastrophe. NASA has said that these areas interfere with all their missions out of Wallops Island; the Navy has said there is not an area in that whole lease block that does not interfere with DOD [Department of Defense] missions, but BOEM [the Bureau of Ocean Energy Management] is continuing ahead," Meghan Lapp, the fisheries liaison for the Rhode Island commercial fishing company Seafreeze, told the panel of lawmakers. "When I've asked them on webinars, like – the Navy said that this is a problem how can you still be leasing it?" she noted, "'Well, we're just going to be continuing the discussions.'" Lapp recounted that she attempted to discuss the issue of potential radar interference with the U.S. Coast Guard in 2018 and found officials there "completely unaware of the issue." "Coast Guard personnel told us, 'we don't know what to tell you, this is literally the first we heard of this.'" The hearing was chaired by Rep. Jeff Van Drew (R-NJ), who represents the district the hearing occurred in, and attended by fellow Jersey Shore lawmaker Rep. Chris Smith (R-NJ), Rep. Andy Harris (R-MD), and Rep. Scott Perry (R-PA). Rep. Smith has introduced legislation in Congress to demand further scientific research into the impact on ocean ecosystems that offshore wind farms may have. In his opening remarks, Rep. Smith, condemning the wind farm project approval process as "shoddy at best," highlighted studies that suggest wind farms could significantly impair the use of radar to navigate the ocean. "Vessel navigation including U.S. Navy ships, merchant ships, and search and rescue operations … their radars will be compromised," he noted, citing a study published last year by the National Academies of Sciences, Engineering, and Medicine. "The report concludes wind turbine generators have significant electromagnetic reflectivity, and therefore can interfere with radar systems operating nearby," the Academies explained in a press release on the results of the investigation into offshore wind farms last year. "The rotating blades can also create reflections in Doppler radar systems. In particular, these forms of interference could obfuscate smaller vessels and stationary objects such as buoys on radar, complicating navigation decisions and increasing the risk of collision with larger vessels." Rep. Smith highlighted that the study found "that wind turbine generators obfuscate the marine vessel radar for both magnetron-based and solid-state radar." END Although the hearing focused on an off-shore wind project and its effect on marine radar navigation, the question that must be addressed with the Lava Wind Project is: what effect will the electromagnetic reflectivity have on area aircraft radar and navigational systems? There are airports in Jerome, Gooding and Burley servicing private and commercial operations, airports in Twin Falls and Sun Valley servicing private, commercial, and scheduled airline service, and a military air base in Mountain Home. A straight-in approach for landing to the Jerome airport from the east will pass over the Lava Ridge Project. There are aircraft from the Mountain Home airbase frequently operating over the Twin Falls area. The Mountain Home airbase commander must be consulted to determine what effect the electromagnetic reflectivity of the wind turbines might have on their activities. Likewise, the FAA must be consulted to determine what effect the electromagnetic reflectivity of the wind turbines might have on private and commercial radar and navigational systems. An unaligned array of 400 wind turbines would generate a confusing signature to operating radar systems, especially with considerable mountainous terrain nearby. IFR operations could be quite hazardous. Also, consideration must be given to both firefighting aircraft and air life-flight operations that could occur in the area. Since the project area will be open to hunting and livestock grazing, there will be considerable human activity in the area. Since there has been no consideration for the effect of the electromagnetic reflectivity of wind turbines on aircraft radar and navigational systems, the NO BUILD OPTION should be selected.	
5501-1	Diana Nielson	Form 7460-1, Notice of Proposed Construction or Alteration, for ASN 2022-WTW-4666-OE. This application states Burley, Joslin Field and the Jerome airports will be negatively affected. Also the small landing strips will be affected like in Dietrich, Laidlaw and other private strips. This project will affect Gooding Airport to indirectly by loss of crop dusting services. These airports are critical for Air Support Emergency services. If Hailey Airport needs an airport for an emergency landing this project will increase the risks and possibly loss of an instrument landing. [...] The transmission line towers will congest this area even more. They also will need an FAA permit application.	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to airspace, airports, and aerial operations in the analysis area are discussed in Section 3.8.2 (Aviation). The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport is located outside of the aviation analysis area.
5896-2	Mike Tylka	Air Space. We have several airports in the area; Jerome, Hazelton, Burley and Hailey. What effect will this have on local airports? How about crop dusters, that generally fly at altitudes lower than these towers? Private pilots in the area? Life Flight helicopters? Fire suppression aircraft?	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
6338-1	Chris Austin	This is in response to your request for informal comments. I'm wondering why MVE doesn't seem to be addressing the FAA's concerns about aviation safety with the 740' tall turbines. The FAA submitted a report in 2021, and that report was scrapped at the request of MVE. Then they were asked to resubmit in 2022, which they have, and they still seem to be ignoring their concerns regarding the turbine heights and their request for the no-build option due to their concerns for aviation safety. According to Mark Doerr "Several years ago MVE requested a survey of the Lava Ridge project and the FAA recommended a do not build due to the impact of the towers to aviation safety, airports and instrument approaches." And "This issue has NOT been addressed even though Ben Crouch, a Jerome County Commissioner and a RAC committee member, has brought it to their	See responses to comments 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation).

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		attention multiple times." Mr Doerr also posted "MVE stated in the DEIS that they just need to build the project and then they will work with the FAA. The only problem with that statement is that the FAA has no authority to demand a tower be taken down after it is built and is found to have an impact on airports and instrument approaches. The FAA has no enforcement authority over construction of towers.	
6387-7	AJ Whitecotton	We have several airports in the area; Jerome, Hazelton, Burley and Hailey. What effect will this have on local airports? How about crop dusters, that generally fly at altitudes lower than these towers? Private pilots in the area? Life Flight helicopters? Fire suppression aircraft?	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
6451-1	Kerry Requa	this project will impact flight safety and compromise the ability to navigate and fly in times of bad weather. In good weather this project will cause unsafe conditions when winds are blowing creating turbulent conditions far downstream from the windmills. The location of the project will have impacts on several landing sites including the airstrips in the desert and in particular the Jerome airport. I want to be assured that all aspects of this proposed project include studies of how our airports and flying activities may be impacted. Please show me how you have included aviation and all possible landing sites in this proposal. We, the Idaho Aviation Association and our members demand you study how aviation safety will be addressed and if any landing sites within the area have been studied.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
6865-1	Amber Cnossen	My husband is a pilot and we fly into Jerome Idaho. We are concerned that the current EIS for the Lava Ridge project does not contain any data for pilots regarding instrument landing and takeoff at Jerome and Gooding airports. Considering the instrument landing plane accident a few months ago at the Burley airport we request this be addressed in the EIS.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information on the potential impacts to the Jerome County Airport and aviation in general during the public scoping period has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport. The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport is located outside of the aviation analysis area.
6871-1	Name Not Provided	I am aware of at least 2 landing areas near the project that are used by aerial applicators. They are located at 42.735076deg, -113.842667deg and 42.764002deg, -113.828460deg. These are located within 1-3 miles of the siting corridors of Alternatives B, C, & E. Many of the farms in the area depend on the aerial applicators for timely applications of fertilizer, and crop protection products. The installation of the turbines would limit farm's access to affordable application methods as some pilots will simply not fly near a turbine. There is also concern that there might be air disturbance from the turbines that would limit the safe and effective operation of helicopter applications.	See comment 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation) regarding turbine wake. Also see response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). These agricultural landing areas were added to the final EIS and are addressed in Section 3.8.2 (Aviation).
6871-3	Name Not Provided	Living near the BLM land I have witnessed many wildfires. Many of those fires have been fought with the help of airplanes. The retardant drops have been used to help control the spread of the fire and to protect homes and fields that are near BLM land. They have been instrumental in getting a large fire under control that is burning too hot and too fast for a firebreak to be established.	See responses to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 11535-60 (see in Table A-3i, Fire and Fuels Management).
7337-1	Matt F.	lease accept my comment regarding the Lava Ridge Wind Project EIS as it relates to determining the reliability of the lighting system on the turbines. The draft EIS, page 3-424 states that lights on turbines will only illuminate when aircraft are within 25 miles. However, these lights, like all electrical and mechanical systems, will eventually fail. The EIS doesn't lay out a process for who pays for the loss of life and property when an aircraft inevitably collides with a turbine. Further, it doesn't call out the details of a system that would monitor whether the lights are always working. Such a system would need to continually monitor for false positives: a light activating when an aircraft is not within 25 miles. It would also need to monitor for false negatives: a light not activating when an aircraft is within 25 miles. If any alternative other than A is approved, Magic Valley Energy should be required to implement and staff a 24 hour system which monitors whether the lights are working for the life of the project. MVE should also be required to fund and implement a dispute resolution mechanism or restitution process whereby MVE would compensate victims for the loss of life and property when an aircraft inevitably collides with a turbine. Approving the project without explicitly calling out the details of such a process is gross negligence.	It is anticipated that the FAA will require turbines and other tall structures exceeding a height of 200 feet above the ground to be marked or lighted per FAA guidelines. MVE would be required to operate the project in compliance with the FAA's requirements for marking and lighting. Through consultation with the FAA, MVE is investigating deployment of an ADLS to mitigate the need for continuous operation of the red flashing lights during nighttime hours. An ADLS comprises one or more elevated radars that scan the region proximate to the siting corridors for aircraft, and only activates the red flashing lights on the turbines when an aircraft is detected within a specified distance. The ADLS systems being installed in the United States are certified by the FAA and must contain a fail-safe system ensuring that, in the event that the radar or any component of the system becomes inoperable, the lights are illuminated permanently. In the event of a lighting outage, wind turbine operators are obligated to notify the FAA so that a Notice to Air Mission can be issued alerting pilots of the outage, regardless of the presence of an ADLS system.
7359-2	Name Not Provided	A turbine makes it much more of a hazard for crop dusters to fly over fields and spray to protect crops.	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
7412-1	Diana Nielson	This map from the FAA application: the Longitude's and Latitudes of 509 Wind Turbines 660 ft tall. Does not include the transmission line towers. (The few extra points in the far upper left corner are errors I don't know how to delete, please disregard.)	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 9216-2 (see in Table A-3o, Land Use and Realty, including Aviation). The analysis in EIS Section 3.8.2 (Aviation) considers the potential for tall structures (greater than 200 feet AGL) to pose hazards to air navigation.
7413-1	Diana Nielson	Magic Valley Energy/ LS Power does not have an approval from the FAA. Form 7460-1, Notice of Proposed Construction or Alteration, for ASN 2022-WTW-4666-OE. This application states Burley, Joslin Field and the Jerome airports will be negatively affected. Also the small landing strips will be affected like in Dietrich, Laidlaw and other private strips. This project will affect Gooding Airport to indirectly by loss of crop dusting services. These airports are critical for Air Support Emergency services. If Hailey Airport needs an airport for an emergency landing this project will increase the risks and possibly loss of an instrument landing.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). The received comments and additional information during the public scoping period on the potential impacts to the Jerome County Airport and aviation in general has provided additional review and detail concerning the potential impacts in the final EIS. See Section 3.8.2 (Aviation) of the EIS for the detailed aviation analysis. Additionally, the Preferred Alternative was identified, in part, to increase the distance of turbine siting corridors from the Jerome airport. The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport is located outside of the aviation analysis area.

Comment ID	Commenter	Public Comment	Response to Comment
7532-2	Daniel Olmstead	The main reason for my opposition is that I am an Independent General Aviation Flight Instructor, and aircraft owner, working out of the Jerome, Idaho airport. The Lava Ridge Wind Project is mostly located in the NE training area of the Jerome Airport. The proposed 400, 700+ foot wind towers will present hazards to most all General Aviation training activities. These activities include low altitude ground reference, and emergency engine out practice maneuvers.	See responses to comments 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8376-2	Rachel Espil	will aerial fire suppression capabilities be obstructed in an area prone to wildfire?	See responses to comments 1042-30 (see in Table A-3i, Fire and Fuels Management) and 11535-60 (see in Table A-3i, Fire and Fuels Management).
8458-7	Sue Page	Also, there isn't any study of the affect on aviation. The effects on the radar system, the wake rolling of light aircraft, the effects of crop dusting down wind and even if it can be done safely or at all. Will the wake turbulence affect the fertilizer sprayed?	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 1053-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8629-1	Cathy Schiers	I am also concerned about how this project will affect the crop-dusting flight paths and firefighting efforts on the farmland and rangeland, as the project will prohibit low level flying and change the course of flight patterns at the Jerome airfield.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8638-2	Mark Southwick	Another important aspect of agriculture is being able to apply fertilizer, nutrients and pest control products to the plants and soils efficiently by air for better and more economic crops. Having 400 wind turbines extending to an altitude of more than 700' above ground level adjacent to crop lands would present a real hardship and danger to those applying the product and a great liability to property owners and those pilots and aircraft being used. The project would limit if not eliminate the opportunity for sound farming practices involving aircraft application. FAA rules and regulations certainly limit operating close to 700' high windmill props and turbines.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8642-2	Carl Montgomery	The airspace restrictions for emergency aircraft, aircraft fighting fires, crop dusters, and others would be detrimental to individuals in critical situations, as well as those operating businesses in the area (namely farmers and ranchers).	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
8790-5	James Ritchie	4. As farmers we rely on having aerial application of certain products on our crops. Our aerial spraying company says this project will negatively impact their ability to apply chemicals to our crops. We are also concerned about the ability to apply fire retardant via the air during a wildfire event in the Star Lake allotment. Living in a rural area we are also concerned about the effect of this project as it relates to Life Flight	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
9173-1	Randy Quigley	I appreciate the opportunity to comment on the Lava Ridge proposed wind project. As an association of Agricultural Aerial Aviators, there are some concerns with this proposed project that we would like to bring to your attention. As you are aware, applying crop protection products by air requires working in a low level flight environment. Most aerial applications take place at approximately 20 feet above the ground, so safety is our top priority. In order to safely and effectively dispense products at these low levels, the pilots need to have safe ingress and egress to the ag fields of around 500 feet. With the proposed height of the wind turbines ranging from 390 to 740 feet, they present a safety issue and a challenge while applying to the agricultural fields adjacent to the proposed wind project. Not only is the height of these wind turbines a safety factor, there is also the wind turbulence component that is generated down wind from these massive windmills that presents a challenge. With the shear number of windmills in this project, the effect of this turbulence will undoubtedly affect the timing that aerial applicators can safely apply to the adjacent crops. Instead of being able to apply to these adjacent fields as in the past, the application will now have to be postponed until favorable winds can occur on the upwind side of these windmills. Because of this restriction, additional damage may result to farmer's crops as the pest will have additional time to decimate their crops while waiting for favorable up wind conditions. The location of the wind towers next to crop land is also a safety concern. Flying a few hundred feet next to these massive structures with the potential of unexpected turbulence is frightening. Due to this issue, we are suggesting that a minimum set back of two miles to crop lands be considered for a safety corridor for aerial application. This distance is based from turbulence and the height issues for proper safety requirements for ingress and egress into the adjacent farm fields. This is especially applicable to the croplands next to the Hidden Valley farming area. Another major concern is the lighting of these tall wind turbines during construction. FAA requires as per 14 CFR Part 77: In general any temporary or permanent structure, including all appurtenances, that exceeds an overall height of 200 feet (61m) above ground level (AGL), or exceeds any obstruction standard contained in should normally be marked and/or lighted. Normally, outside commercial lighting is not considered a sufficient reason to omit recommended marking and/or lighting. Recommendations on marking and/or lighting structures can vary depending on terrain features, weather patterns, geographic location, and in the case of wind turbines, number of structures and overall layout of design. The FAA may also recommend marking and/or lighting a structure that does not exceed 200 (61m) feet AGL or 14 CFR Part 77 standards because of its particular location. You can find additional guidance in Advisory Circular 70/7460-1M, Obstruction Marking and Lighting. This was not addressed during the construction phase of the EIS and we are concerned that at night, the height of finished and unfinished wind turbines as well as the huge cranes that are left with their booms upright will exceed the 200 feet restriction and for safety purposes some type of FAA approved lighting needs to be in place during the construction phase. Idaho currently has a MET Tower Marking Law in place that requires a flashing light on towers above (50) fifty feet that are located outside city limits. We hope that this law is already in affect for existing MET Towers as well as any proposed ones. This was also not addressed in the EIS. Here is the link for that law. https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2012/legislation/H0511.pdf The	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1 [Affected Environment]) and to analyze how they might be affected by the project (see Section 3.8.2.2 [Impacts]). Aviation for fire suppression activities is discussed in Section 3.7 (Fire and Fuels Management). See response to comment 1042-30 (see in Table A-3i, Fire and Fuels Management) for additional analysis added to EIS Section 3.7 (Fire and Fuels Management). As described in Section 3.8.2.2 (Aviation) the project would not significantly impact or reduce the usefulness of the existing overlying FAA airspace, except for within 500 feet of obstructions, and there would be no significant impact to the use of the identified and registered airports in the analysis area. Pilot operations would be similar to other navigation hazards occurring within the analysis area from existing tall infrastructure, including transmission towers, communication towers, and met towers. Pilots operating under VFR in the associated Class E and Class G airspace in the analysis area would still be required to navigate using the "see and avoid" concept around the turbines or other obstructions (transmission towers or met towers). Regarding turbine lighting, it is anticipated that the FAA will require turbines and other tall structures exceeding height of 200 feet above the ground to be marked or lighted per FAA guidelines. MVE would be required to operate the project in compliance with the FAA's requirements for marking and lighting. Also see response to comment 7337-1 (see in Table A-3o, Land Use and Realty, including Aviation).

Comment ID	Commenter	Public Comment	Response to Comment
		proposed Lava Ridge Project encompasses a large tract of BLM land which has had a history of lightening strikes which causes fires and as such using aerial fire fighting tankers will be greatly inhibited when dropping fire retardants with the 740 feet wind turbines hidden in the smoke. Also the restoration projects for aerial reseeding will be impacted with the number of wind turbines dotting the terrain. We do hope that those considerations have been factored into the proposed project lay out and that safety corridors will be established to accomplish fire fighting as well as the aerial reseeding of the burn areas. After careful review of the EIS, I could not find the FAA's findings of their original assessment of impact on aviation. See their letter below: [Notice of Preliminary Findings from FAA] Why wasn't this included in the EIS? We as an Association feel that a decision on the project should not be made until the Federal Aviation Administration has had an opportunity to officially fully weigh in on the impact this will have on the airspace, airports and aviation in the area. The Idaho Agricultural Aviation Association recognizes that energy demands will increase over time, but the power that is generated in Idaho should be part of Idaho's power and not destined to some other out of state market. If Idaho has to give up land, Idaho should also enjoy that benefit and it shouldn't come as a sacrifice for safety nor the reduction of agricultural crops. Right now there is an inordinate amount of political enthusiasm and investor hype to jump into wind generation, but at what point is the loss of public lands, the curtailment of farming and ranching, the desecration of sacred and historical sites, as well as the loss of Diurnal Raptors enough to put the brakes on such enthusiasm. How many dead Raptors will it take to say enough is enough? We ask that you review our concerns for safety, so that we can safely continue to apply crop protection products to adjacent farmlands in this project. We also respectfully lend our support to the recently adopted Idaho's House of Representatives Concurrent Resolution Number 004 of a No Build Option. This bill outlines the concerns voiced through a unified opposition to the project by local governments, counties, highway districts, farm and ranch groups and Idahoans about Lava Ridge. This bill passed both the House and Senate unanimously and was adopted by the State and be doing so requests the Governor and Attorney General to take what legal actions are available to encourage the BLM to select the No Build Option. The voice of the people has spoken through this resolution which is a lot of voices to be reconciled with! Please don't be distracted by the current political hype and error on the side of caution. The concerns we have outlined needs more time to be studied in order to be fully reconciled. Warmest Regards, Randy Quigley President of the Idaho Agricultural Aviation Association	
9216-2	Jon McGregor	I am here to talk about the affects Lava Ridge wind project would have on aviation. Section 5.10.2 of BLM (2005) describes impacts to aviation with wind energy. BLM (2005) found that because a wind energy development project would to meet FAA criteria, no adverse impacts to aviation would be expected. MVE has not met FAA criteria mitigation for dealing with the tall wind structures. FAA has said that option A NO BUILD is the only choice. Therefore option A NO BUILD is the only choice for me.	Section 3.8.2 (Aviation) was added to the EIS to discuss aviation issues, including those related to airspace, airports, and aerial operations in the analysis area (see Section 3.8.2.1) and to analyze how they might be affected by the project (see Section 3.8.2.2). MVE filed a Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA for Alternative B with a maximum turbine height of 660 feet AGL (approximately 4,933 feet amsl). The FAA issued an NPH on February 2, 2023, which initiated an FAA public comment period and aeronautical study (FAA 2023a [Aeronautical Study No. 2022-WTW-4666-OE]). The comment period closed on March 11, 2023. As part of the NPH, the FAA public notice contained a preliminary list of detailed impacts that would result in exceeding current federal obstruction standards (as per 14 CFR 77.17 (a)(1) and (3)) and the other effects on aeronautical operations (as per 14 CFR 77.29 (a)(1). The FAA aeronautical study is underway, and results of the final study were not available at the time of EIS publication. The analysis contained in the EIS references the preliminary analysis that was disclosed in the FAA public notice.
9504-3	Zack Lanie; Idaho Farm Bureau Federation	My second concern has to do with the aerial applicators that are relied on so heavily to apply chemical and pesticide via airplane to those local farmers in the proposed area. The proposed windmill heights has raised high concerns for the safety of those pilots as well as just being able to accomplish the job needed to get done when it comes to applying chemical to fields. Not only is there the aerial applicators for crops but there are also those pilots that are there that fly to help manage the coyote population in this area. With as many windmills that have been proposed, it would make it extremely difficult to effectively manage the coyote population.	See response to comment 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation).
9902-1	Mary Saucier	Magic Valley Energy/ LS Power does not have an approval from the FAA. Form 7460-1, Notice of Proposed Construction or Alteration, for ASN 2022-WTW-4666-OE. This application states Burley, Joslin Field and the Jerome airports will be negatively affected. Also the small landing strips will be affected like in Dietrich, Laidlaw and other private strips. This project will affect Gooding Airport to indirectly by loss of crop dusting services. These airports are critical for Air Support Emergency services. If Hailey Airport needs an airport for an emergency landing this project will increase the risks and possibly loss of an instrument landing.	See responses to comments 3224-1 (see in Table A-3o, Land Use and Realty, including Aviation) and 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to airspace, airports, and aerial operations in the analysis area are discussed in Section 3.8.2 (Aviation). The analysis area for aviation comprises the Alternative B siting corridors and a 15-mile buffer. The Gooding Airport is located outside of the aviation analysis area.

Livestock Grazing

Table A-3p. Livestock Grazing

Comment ID	Commenter	Public Comment	Response to Comment
10420-1	Darrin Lamb	The EIS is not done correctly. It violated the Taylor grazing act.	The EIS follows NEPA, FLPMA, and applicable CFRs and BLM manual guidance. See Section 3.9.1 (Grazing Allotments and Range Socioeconomic): "Existing livestock grazing permits would not be modified through this

Comment ID	Commenter	Public Comment	Response to Comment
			EIS. If part of the action alternatives would require modifications to grazing permits, this would be addressed in a subsequent NEPA analysis and permit actions, in accordance with CFR Subpart 4120, Grazing Regulations."
10421-2	Barbara Martien	[Vote no for wind towers on Lava Ridge.] Cattle grazing laws violated.	See response to comment 10420-1 (see in Table A-3p, Livestock Grazing).
10423-1	Scott Prow	I would like to point your attention to the second part of an article which seems to show that the BLM would be in violation of Federal Law if this project were to be initiated. Schumacher, Karen. "Is The BLM Violating Grazing Laws? Part 2." Redoubt News, 1 Apr 23	Also see response to comment 10420-1 (see in Table A-3p, Livestock Grazing). MVE submitted their application and preliminary plan of development in February 2020, and revised their plan in October 2022 and again in December 2023 (MVE 2023). As part of the EIS process, the BLM held public scoping and consultation meetings and initiated coordination with cooperating agencies and Tribes. Public scoping for the project was initiated on August 20, 2021, when the BLM published an NOI in the *Federal Register*. Two virtual public scoping meetings were held on September 8 and 9, 2021. Seven government entities are participating as cooperating agencies: the NPS, the USACE, the USFWS, the State of Idaho, Jerome County, Lincoln County, and Minidoka County. The project scoping report and the BLM's consultation and coordination documentation are available at https://eplanning.blm.gov/eplanning-ui/project/2013782/510. With release of the draft EIS, the BLM held public meetings in Shoshone and Twin Falls, Idaho; Portland, Oregon; and Seattle, Washington in late February and early March 2023. The BLM also held virtual meetings in February 2023. The BLM has now revised the EIS in response to public and agency comments.
10426-6	Casey Stevenson	[These are my concerns which have not been addressed by the EIS which will impact thousands of people, and need to be reevaluated. Here are my concerns:] In addition, Wind turbines can cause a flickering effect when the sun shines through the spinning blades, which may be annoying or even harmful to animals and humans. This can be particularly problematic for livestock, as the flicker effect can cause them to become agitated or stressed. The disturbance caused by the construction and operation of wind turbines can cause stress and anxiety in cattle, which can lead to a reduction in milk production and weight gain. Another effect would be behavioral changes in cattle, such as reduced grazing, increased aggression, and decreased socialization. Furthermore, the electromagnetic fields generated by the wind turbines can affect cattle's biological processes, such as their circadian rhythms and hormonal balances, leading to disruptions in their reproductive and metabolic functions. The construction and operation of wind turbines can cause disturbances in the local ecosystem, which can impact the availability and quality of pasturelands for livestock. The construction of access roads, foundations, and transmission lines can cause soil compaction, erosion, and changes in the surface hydrology, which can result in the loss of topsoil and reduced vegetation cover, leading to reduced forage availability. The use of herbicides to control vegetation around wind turbines can also have negative effects on livestock health by reducing soil biodiversity and microbial activity, which are essential for maintaining soil health and forage productivity.	See response to comment 11204-20 (see in Table A-3p, Livestock Grazing). Section 3.9.2 (Physiological Effects to Livestock) discusses physiological effects to livestock, including available published literature and analysis. An in-depth review was conducted on the effects of increased anthropogenic stress catalysts to cattle and sheep, specifically associated with shadow flicker, electromagnetism, noise, vehicle traffic, and a general increase in human presence. No published literature directly addressing shadow flicker and effects to livestock was identified. Helldin et al. (2012) does note that there were no documented visual impacts to terrestrial mammals from wind farms; however, there could be some cumulative effects from multiple wind projects adjacent to each other (size and number of wind projects leading to cumulative effects was not defined). Impacts to livestock grazing AUMs are discussed in Section 3.9.1 (Grazing Allotments and Range Socioeconomic). Vegetation is discussed in Section 3.15 (Vegetation), soils and hydrology are discussed in Sections 3.13 (Soils) and 3.17 (Water and Wetland Resources), respectively. All herbicide application will follow BLM, State of Idaho, and label guidelines. Applicant-committed measures in Table App4-2k are meant to address weed and pollinator habitat and include implementation of the Noxious Weed Management Plan (Appendix R in MVE [2023]) and use of a BLM-approved herbicide plan.
10427-2	Jess Bartlett	The damaging effects they've been shown to have on livestock? Have the detrimental affects to an area almost completely dependant on farms been considered?	See EIS analysis in Section 3.9.2 (Physiological Effects to Livestock) and AIB-34 and AIB-44 in EIS Appendix 3 (Issues Analyzed in Brief).
11204-1	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	However, as explained herein, this illustration is a gross understatement of the "Acreage Unavailable for Livestock Grazing" because it only accounts for the actual disturbed areas, and not true zone of impact, as illustrated in DEIS Figure 3.9-1 (copy inserted above).	Determination of impacted areas, using potential ground disturbance and vegetation removal from the siting corridors, is described in Chapter 2 (Proposed Action and Alternatives) and Section 3.1.2 (Analysis Approach). The disturbance calculations outlined in those sections were used for the Section 3.9.1 (Grazing Allotments and Range Socioeconomic) analysis. The Grazing Coordination Plan (Appendix S in MVE [2023]) also defines the AUMs to potentially be affected by each project phase.
11204-4	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	DEIS did not consider or assess the "issues raised" through the public scoping period and consultation and coordination with the likes of the Permittees;	The issues raised through scoping and in response to public comments on the draft EIS are addressed within the EIS as issues analyzed in detail (in EIS Chapter 3 [Affected Environment and Impacts]) or as issues analyzed in brief (in EIS Appendix 3 [Issues Analyzed in Brief]). Issues raised by the permittees are being addressed in the Grazing Coordination Plan (Appendix S in MVE [2023]), EIS Sections 3.9 (Livestock Grazing) and 3.9.1 (Grazing Allotments and Range Socioeconomics), and AIB-16. Coordination between MVE, the BLM, and grazing permittees is ongoing and would occur throughout the life of the project, if authorized.
11204-13	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	VII. Lack of consideration and assessment of impacts to livestock grazing operations. A. The DEIS failed to consider and assess the authorization of the Permittees' applications to reactivate Suspended Use AUMs and approve additional AUM increases before processing the application for this wind power Project. See 2021 Comments, pgs. 4, 15, 19, 21; see also 2022 Comments, pgs. 9-10. Summary: BLM must not complete processing the application for this new Project until it processes (either first or simultaneously) the Permittees' previously pending applications to re-authorize our Suspended Use AUMs and make additional AUM increases based upon production monitoring. The 2021 Comments requested that the BLM evaluate activation of the Permittees Suspended use AUMs. BLM committed to reward the Permittees for their previous investments in the Star Lake Allotment by activating (at least) our Suspended Use AUMs some time ago. However, BLM has not processed our 2009 applications to activate our Suspended Use AUMs and make additional AUM increases based upon production monitoring that was conducted within the Star Lake Allotment. Now, the BLM is processing the application for this Project to construct a wind power facility within, in part, the Star Lake Allotment without having taken any action on our previously pending applications. See 2021 Comments at pg. 4. Our 2022 Comments contemplated an agreement for MVE to engage a NEPA contractor to pay for and to coordinate with BLM a permit renewal process for the Star Lake Allotment wherein one of the alternatives considered and assessed would be to re-activate our Suspended Use AUMs, and wherein another of the alternatives considered and assessed would be to increase our Permitted Use AUMs (beyond what would be	See EIS Sections 3.1.1 (Existing and Future Trends and Actions) and 3.9.1 (Grazing Allotments and Range Socioeconomics). Existing and future trends and actions are those that have occurred in the past and are expected to continue to occur into the future, including livestock grazing within allotments on public and private lands in the analysis area. During project construction, MVE has developed the Grazing Coordination Plan (Appendix S in MVE [2023]) with the grazing permittees in the analysis area to offset potential impacts to their grazing operations and forage availability for the estimated up to 3-year construction phase. The BLM added EIS Appendix 12 (Historical Livestock Actual Use and Utilization) to this EIS. The reduced forage availability (using AUMs) during project operation would be 1.3% or less of the active AUMs across all action alternatives (post-project, this reduction would be less than 1%). Because the average historical actual use within the Sid Butte and Star Lake allotments has been 68% and 94%, respectively, and the average historical utilization has been 46% for both allotments, there is sufficient forage availability to accommodate this estimated reduction (see EIS Appendix 12). Additionally, fire rehabilitation seedings have increased forage production across the project area such that there is additional abundant forage available above what is currently permitted. There is more forage available than what is currently in use and beyond what would be affected during operation and final reclamation. Livestock grazing permit changes are not part of evaluating MVE's application for a wind generation facility. Any grazing permit authorizations or changes warranted by the ROD will be completed through a separate permit

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		authorized if our Suspended AUMs were reactivated). See 2022 Comments at pgs. 9-10. The DEIS did not adequately address this issue. The number of Permitted Use AUMs in the Star Lake Allotment is subject to change in accordance with 43 C.F.R. §§ 4110.3, 4110.3-3(b) (10-1-2005 Edition). On May 8, 2009, the Permittees submitted applications to reactivate their respective Suspended Use AUMs and to make additional AUM increases based upon production monitoring they conducted, all in accordance with 43 C.F.R. § 4110.3-1(b) (10-1-2005 Edition). These applications remain pending and have not yet been processed, apparently due to other priorities by the BLM. See 2021 Comments at pg. 15. To protect the public land resources in the 1960s, Star Lake Allotment permittees agreed to an AUM suspension with the understanding that the AUMs would be re-activated once the permittees implemented rotational management, and installed seedings, water developments, and fencing within the Allotment. The Permittees contend that such commitments were satisfied over 25 years ago and that the Suspended Use AUMs should be or should have already been reinstated. Permittees have also spent nearly $100,000 in production monitoring to demonstrate the availability of additional forage on a sustained-yield basis to support, at least, activation of their Suspended AUMs. For nearly 14-years now, the BLM has failed to process our 2009 applications, and now with this intended wind power Project, all hope fair treatment and a return on our investment are lost. See 2021 Comments at pg. 19. It is inappropriate and untimely for the BLM to consider this wind power Project which has the potential to interfere with our previous applications to activate (at least) our Suspended Use AUMs before the BLM has processed our previously pending applications. Authorization for a new multiple-use activity within the Star Lake Allotment is inappropriate if it reduces or precludes the ability to authorize previously submitted applications to re-authorize suspended AUMs and make additional AUM increases associated with our ongoing multiple-use activities within the Allotment. The DEIS completely fails to address the issue of evaluating our previously pending applications to re-authorize our Suspended Use AUMs and to make additional AUM increases based upon our production monitoring. Such applications were unquestionably a foreseeable element not considered or assessed. Our 2022 Comments (at pgs. 9-10) contemplated this as a potential future action (within 1-year after completion of the last construction subphase or within 4-years after completion of the first construction subphase within the Star Lake Allotment, whichever comes first). However, the interests of equity and fairness, if not the law too, actually demand that consideration of our previously pending applications to re-authorize our Suspended Use AUMs and to make additional AUM increases based upon production monitoring occur prior to, or simultaneously with, the processing of the application for the wind power Project.	action. Analysis to reauthorize suspended use is outside the scope of this wind project EIS. FLPMA provides the BLM the ability to prioritize evaluation of projects at BLM discretion.
11204-14	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Need for MVE to pay for lost AUMs due to temporary displacement or permanent elimination, or to pay for alternative forage, or to offset temporary non-use AUMs via acquisition. See 2021 Comments, pg. 17; see also 2022 Comments, pg. 4. Summary: The DEIS failed to adequately consider and assess MVE's ability and commitment to provide alternative feed sources for the loss of AUMs during all Project phases, or to pay fair market value for any temporarily displaced or permanently eliminated AUMs lost due to Project-related activities for which alternative feed sources are unable to be secured. The 2021 Comments asked if the applicant (MVE) is going to pay for the lost AUMs (either permanently eliminated or temporarily displaced) or is going to pay for alternative forage (either via hay or via leased private pasture) for the lost AUMs associated with the proposed Project. The DEIS purports to address these issues, as follows: • The DEIS states at pg. 3-232 that the Grazing Coordination Plan (Draft Appendix S of MVE [2022]) discloses that "MVE has committed to providing an equivalent feed source to grazing permittees for AUMs unavailable during construction and decommissioning." This portion of the DEIS goes on to state that equivalent feed sources "include, but are not limited to, range forage at other locations, private ground forage operations, feedlot space, or other commercial arrangements that MVE may agree to with permittees." • The DEIS reports at pg. 3-232 that under Alternative B, even though MVE would provide equivalent feed sources for the loss of AUMs during construction (and decommissioning as quoted above) "there is still some potential for grazing permittees to experience economic uncertainty and risk as they adapt their grazing operations to the changing conditions." The DEIS additionally reports "the broader livestock grazing community may experience a period of economic uncertainty and other adverse social effects (e.g., increased community stress) as the availability of feed sources within the overall community becomes increasingly scarce" (DEIS, pgs. 3-232 & 3-233). The DEIS concludes that these economic uncertainties would be reduced somewhat under the other action alternatives (Alternatives C, D, and E). • The DEIS anticipates that "the combined effect of all long-term AUM reductions may have rippling effects to the broader livestock grazing community leading to a period of economic uncertainty and other adverse social effects (e.g., increased community stress) as the availability of feed sources within the overall community becomes increasingly scarce" (DEIS, pg. 3-234). Again, the DEIS forecasts that these economic uncertainties and adverse social effects would be reduced somewhat under the other action alternatives (Alternatives C, D, and E). • The DEIS at pg. 3-280 states that during construction "MVE would provide feed sources for the loss of AUMs; therefore, there would be no impacts to livestock AUMs from construction" with respect to any of the action alternatives. • Table 3.9-3 of the DEIS at pg. 3-280 reports the number of Active AUMs that "could be temporarily reduced" for each action alternative "during decommissioning." • Supporting documents for the DEIS state "MVE is proposing a suite of measures to avoid, minimize, and mitigate the potential impacts to grazing permittees." These documents report that, among other things, such measures will "provide alternative forage for AUMs that are unavailable during construction and postconstruction reclamation periods." See DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-1. The Grazing Coordination Plan also states that for "AUMs that are unavailable during the construction and reclamation periods, MVE is committed to providing an equivalent feed source to affected grazing permittees" which "may take the form of range forage at other locations, private ground forage operations, feedlot space, or other commercial arrangements that MVE may agree to with permittees." See DEIS, Draft Appendix S,	Also see responses to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1). MVE has committed to providing alternative feed sources during construction (and decommissioning) through a variety of options and applying the permittees' current rest rotation approach, as noted in the Grazing Coordination Plan (Appendix S in MVE [2023]). These measures have also been included in Table 4-2f (EIS Appendix 4 [Mitigation]) as applicant-committed measures 43 through 48. Discussion of impacts to acres of available forage and AUMs can be found in Section 3.9.1 (Grazing Allotments and Range Socioeconomics).

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		Grazing Coordination Plan, pg. S-3. Here, as should be clear in reading the foregoing bullet points, the word "purports" is correctly used. The DEIS did not consider or assess the availability, or lack thereof, of an "equivalent feed source", i.e., range forage at other locations, private ground forage operations, feedlot space, or other commercial arrangements, during all phases of the proposed Project, i.e., construction, rehabilitation, operation, and decommissioning. Permittees contend that such an "equivalent feed source" will be non-existent at the scope that would be needed to implement all phases of the proposed Project. At a minimum, the DEIS should consider and assess the ability for MVE to fulfill its apparent promise / commitment. In fact, the DEIS correctly recognizes that the availability of feed sources within the overall community" will become "increasingly scarce" due to pressures imposed by Project-related activities. DEIS, pg. 3-234. To this end, the DEIS must consider and assess MVE's ability to implement its commitment to provide alternative feed sources for the loss of AUMs during all Project phases and must establish a term and condition that in the alternative MVE commits to pay fair market value for any temporarily displaced or permanently eliminated AUMs lost due to Project-related activities for which alternative feed sources are unable to be secured. While Permittees appreciate that the Taylor Grazing Act, 43 U.S.C. § 315b, does not "create any right, title, interest, or estate in or to the lands," see also Federal Land Policy and Management Act, 43 U.S.C. § 1752(j), financial compensation related to use or lack of use of public lands AUMs is not foreign to the grazing regulations, or even the Taylor Grazing Act. 43 C.F.R. § 4120.3-3(c) (10-1-2005 Edition) prescribes that when a permittee cannot make use of AUMs, an applicant can apply to activate such AUMs subject to the reasonable compensation for the use and maintenance of improvement and facilities of the permittee. See also 43 C.F.R. § 4120.3-6(c) (10-1-2005 Edition). The Taylor Grazing Act, 43 U.S.C. § 315q, prescribes that when the national defense "prevents" the use of the public lands for grazing, the permittee shall be paid for the 'fair and reasonable … losses suffered." In addition, there are "distinct investment-backed expectations" associated with the use and conveyance of Grazing Preferences and Permitted Use AUMs attached to "Base property." In fact, Idaho Code 25-901 prescribes that "a grazing preference right shall be considered an appurtenance of the base property through which the grazing preference is maintained.". The Internal Revenue Service even taxes any income derived from the use or lease of such AUMs and also taxes any capital gain derived from the sale of such AUMs.	
11204-15	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Given this, it is necessary for BLM to consider and assess optional mitigation to compensate for any lost AUMs for which equivalent feed sources are not secured as a product of the wind proposal during the construction phase, rehabilitation phase, operational phase, and decommissioning phase.	See response to comment 11204-13 (see in Table A-3p, Livestock Grazing).
11204-17	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	D. Need for MVE to pay for range improvement deterioration/damage and any associated mitigation projects. See 2021 Comments, pg. 17. Summary: The DEIS failed to adequately consider and assess MVE's commitment to provide compensation for changes made in all phases of the project, not just the construction phase. The 2021 Comments asked if the applicant (MVE) would "pay for any damage and/or repair to the existing public land range improvements" either permanently or temporarily impacted by the proposed Project. See 2021 Comments, pg. 17. The DEIS purports to address these issues, as follows: First, the DEIS describes the following commitments regarding impacts to range improvements in association with the proposed Project: Range improvement functionality would not be degraded from the existing condition. Any project changes to range improvements would maintain functionality (including stock 9 The amount of financial mitigation relative to such Project-related fire events is unknown beforehand because it would depend upon the size and damage level for any such fire event(s), though compensation for such fire damages would be determined by mutual agreement between MVE and the Permittees, or in the alternative, by binding, arbitration, not subject to appeal/challenge by any party. watering, fences, and cattle guards), would be coordinated beforehand with the permittees and the BLM, and would be paid for by MVE. DEIS, pgs. 3-278 & 3-279 (emphasis added). Consistent therewith, Appendix 3 of the DEIS reports: As per MVE (2022) Appendix S (Grazing Coordination Plan), range improvement functionality would not be degraded from the existing condition. Any project changes to range improvements would maintain functionality (including stock watering, fences, and cattle guards) and would be coordinated with the permittees and the BLM prior to project construction activities and would be paid for by MVE. As deemed necessary, this would include MVE paying for resource surveys (e.g., botany, wildlife, archaeology) prior to range improvement modification or construction. Therefore, impacts to range improvements would be effectively mitigated. DEIS, Table App3-1, Issue AIB-16, pg. App3-7 (emphasis added). Second, the Grazing Coordination Plan reports that "MVE is proposing a suite of measures to avoid, minimize, and mitigate the potential impacts to grazing permittees" which would, among other things, "maintain the function of range improvements." DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-1. Page S-2 of the Grazing Coordination Plan states that "MVE is proposing additions and modifications to range improvements" within affected allotments and reports that the "resource surveys and installation costs associated with these range improvements will be funded by MVE." See also DEIS Table App4-2f, Applicant- Committed Measures – Fencing and Range Improvements under Appendix 4 (Mitigation) of the DEIS for details regarding mitigation measures related to range improvements associated with the proposed Project. Because of the seemingly all-inclusive nature of this disclaimer, the DEIS omitted consideration and assessment of any kind regarding any Project-related changes to range improvements during all phases of the project, i.e., construction, rehabilitation, operation, and decommissioning. The Permittees project that changes to range improvements would need to occur to some degree in all phases of the proposed Project.	See response to comment 11204-19 (see in Table A-3p, Livestock Grazing).

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11204-18	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	E. Need for MVE to pay for alternative or supplemental fences to mitigate any impacts due to the proposed Project. See 2021 Comments, pg. 17; see also Fence Issue (2022 Comments, pgs. 7-8). Summary: The DEIS failed to adequately consider and assess that some permanent fencing would be needed and that some existing fencing would need to be removed, particularly after coordination with Permittees and BLM before implementing any phase of the project. The 2021 Comments asked if the applicant (MVE) would pay for alternative or supplemental fences to mitigate any impacts (either permanent or temporary) with respect to Project related activities. 2021 Comments, pg. 17. The 2022 Comments stated that the Permittees oppose construction of an extensive new permanent fence network, but do not oppose construction of some select new permanent fences (to create strategic exclusion areas) and some select temporary fences during the construction (and decommissioning) phase(s) (2022 Comments, pgs. 7-8). The Permittees again voiced their opposition to the construction of an extensive new fence network around Project access roads or infrastructure with either permanent or temporary fences. Permittees oppose the fencing of the roads. Instead, the Permittees believe that their recommendation to divide the Project construction phase within the Star Lake Allotment into three separate subphases will reduce the potential for conflicts between construction activities and livestock operations and will greatly reduce the need for an extensive network of new fences, either permanent or temporary, during construction. The Permittees do not oppose construction of some select temporary fences during the construction (and decommissioning) phase(s) to prevent conflicts between Project activities and livestock operations and construction of some select new permanent fences (to create strategic exclusion areas) during the postconstruction and operational phases of the proposed Project. However, the Permittees urge that MVE coordinate and cooperate with them to determine the extent and site-specific locations for any new temporary or permanent fences constructed in association with the proposed Project if it is authorized. The DEIS describes the following commitments regarding fence improvements in association with the proposed Project: As part of the Grazing Coordination Plan, no permanent fencing or removal of existing fencing would occur. However, approximately 50 miles of temporary fences would be installed along primary access roads to alleviate concerns about excess traffic during construction and interim reclamation, and another 295 miles of temporary fencing would be installed surrounding work areas (with 20%–25% estimated for deployment at any given time). DEIS, pgs. 3-278 & 3-279 (emphasis added). It is erroneous to expect that the installation of temporary fences along primary access roads can “alleviate concerns about excess traffic” since the temporary fences themselves will require additional traffic for fence installation and removal and will not reduce traffic levels associated with other Project-related activities. Page S-2 of the Grazing Coordination Plan also reports “MVE is proposing no new permanent fencing and no removal of existing fencing in an effort to alleviate pasture fragmentation.” Instead, “to reduce the potential for livestock collisions with Project-related vehicles, collisions with general public traffic, reduce livestock stress and disturbance, improve livestock management, and reduce potential construction delays, MVE is proposing the installation of temporary fence (such as electric fence) during construction and reclamation periods” DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-2. The Plan projects that “up to approximately 295 miles of temporary fence may be deployed during construction and interim and final reclamation periods of the Project” with an expectation that approximately “20 to 25% of the temporary fence may be deployed at any given time” DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-3.10 Because of the seemingly all-inclusive nature of this disclaimer, the DEIS omitted consideration and assessment of any kind regarding construction of additional permanent fencing and removal of any existing fences during any Project phases, i.e., construction, rehabilitation, operation, and decommissioning. The Permittees project that changes to the existing fence layout will need to occur to some degree in all Project phases. The DEIS errs in stating that “no permanent fencing or removal of existing fencing would occur.” Related thereto, the 2022 Comments expressed the Permittees’ understanding that intended Project rehabilitation phases within the Star Lake Allotment would be for 1-year to 2-year periods after each construction phase is completed and would likely be limited to approximately a 300-foot diameter area around each of the wind turbines (2022 Comments, pg. 5). Such rehabilitation would / should be done at MVE’s expense. Any associated temporary fences around such areas would be constructed and maintained at MVE’s expense, and any such temporary fences would be removed after the expiration of the rehabilitation periods at MVE’s expense. 2022 Comments, pg. 5. Furthermore, any seeding around such areas should use crested wheatgrass because such grass is already a dominate vegetation component in the Star Lake Allotment, because it is well-adapted to colonize disturbed arid sites, and because it has proven abilities to protect the watershed and related resources.	See Section S3.4 (Star Lake Allotment Plans) in the Grazing Coordination Plan (Appendix S in MVE [2023]). MVE is proposing no new permanent fencing and no removal of existing fencing; MVE is proposing the installation of temporary fence during construction and reclamation periods. Three construction subphases for the Star Lake allotment are included in the Grazing Coordination Plan and evaluated in Alternatives B, C, D, and E. MVE has committed to constructing and maintaining temporary fences required for this project, at MVE’s expense. See also the Noxious Weed Management Plan (Appendix R in MVE [2023]). MVE will coordinate with the BLM botanist to develop an approved seed mix for the project.
11204-19	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Need for MVE to pay for alternative or supplemental water developments to mitigate any impacts due to the proposed Project (2021 Comments, pg. 17) and Water Development Issue (2022 Comments, pg. 8). The 2021 Comments asked if the applicant (MVE) would pay for alternative or supplemental water developments to mitigate any impacts (either permanent or temporary) with respect to Project related activities. 2021 Comments, pg. 17. The 2022 Comments stated that the Permittees opposed construction of the water developments initially proposed for the Project, but believe some new troughs and the modification of some existing troughs is necessary to improve livestock management during postconstruction and operational phases. 2022 Comments, pg. 8. The Permittees’ concerns with respect to this issue become increasingly serious as we study the DEIS and its supporting documents in greater detail. The proposed Project is anticipated to require a substantial amount of blasting to construct / improve access roads, crane paths, and Project infrastructure. We expect that such blasting (and crane use) will crush, collapse, or otherwise damage well casings, pipelines, and related infrastructure associated with our existing water developments, and may also damage water distribution canals. It is unclear if MVE’s commitment expressed through the DEIS that “[r]ange improvement functionality would not be degraded from the existing condition” and that any “changes to range improvements would maintain	See responses to comments 1042-12 (see in Table A-3cc, Mitigation – EIS Appendix 4), 11226-1 and 1042-14 (see in Table A-3z, Water and Wetland Resources), 8421-4 (see in Table A-3m, Human Health and Safety), and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1) regarding reclamation bonding, potential impacts to water wells from project construction, and MVE compensating grazing permittees for injured or killed livestock. MVE has committed to funding resource surveys and repair or installation costs for any range improvements needed to meet the Grazing Coordination Plan (Appendix S in MVE [2023]). The Grazing Coordination Plan details livestock management needs to meet the project phases, including BLM and permittee review of the detailed construction timing, if the project is authorized. Currently, the EIS assumes construction and decommissioning durations of up to 2 to 3 years with subphasing identified within the EIS, and a project operation phase of 30 years.

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		functionality" (DEIS, pg. 3-279) extends to all Project-related activities, including blasting and crane operations. The DEIS needs to be amended to clarify that MVE will repair, replace, or pay compensation in a timely manner for any damage to existing infrastructure developments within or adjacent to the proposed Project siting and access corridors that results from any Project-related activities, including blasting and crane operations. Further, it is unclear if MVE's commitment expressed through the DEIS that "[r]ange improvement functionality would not be degraded from the existing condition" and that any "changes to range improvements would maintain functionality" (DEIS, pg. 3-279) extends to the "functionality" and "existing conditions" for the water rights associated with the Permittees water developments that would be impacted by the proposed Project. The DEIS needs to be amended to clarify that MVE will compensate the Permittees in a timely manner for any loss of value to their existing water rights that results from Project-related impacts to such water rights whether in the form of impacts to water quality, water quantity, water availability (i.e., static water depth), or other factors. The DEIS reports (at pgs. ES-x, 3-381, and App11-19) that "MVE would be required to have a reclamation bond" but does not disclose any other bonding requirements. The DEIS needs to be amended to establish a bonding requirement to ensure that funds are available when the Project is initiated to cover costs associated with MVE's commitments to prevent range improvement functionality from being "degraded from the existing condition" and that any "changes to range improvements would maintain functionality" (DEIS, pg. 3-279). In other words, a cash fund should be required so neither BLM nor Permittees have to go through some bonding claim process to be reimbursed for losses, particularly routine losses that would likely be common occur, i.e., a wind project truck hitting and killing/injuring livestock. The DEIS purports to address the water development issues, as follows: First, the DEIS describes the following commitments regarding water developments in association with the proposed Project: Additionally, up to 65 water troughs may be installed to facilitate livestock distribution or access to water. Pipeline disturbance for the water troughs would occur within the project work areas. Range improvement functionality would not be degraded from the existing condition. Any project changes to range improvements would maintain functionality (including stock watering, fences, and cattle guards), would be coordinated beforehand with the permittees and the BLM, and would be paid for by MVE. DEIS, pgs. 3-278 & 3-279 (emphasis added). Again, it is unclear if these commitments extend to all Project- related activities, including blasting and crane operations. Second, Table 2.4-1 of the DEIS anticipates that up to 65 new stockwater troughs and up to 54 new waterline miles would be constructed under Alternative B of the proposed Project, with fewer troughs and waterline miles being required under the other action alternatives. DEIS, pg. 2-6. Third, Page S-2 of the Grazing Coordination Plan states that "MVE is proposing additions and modifications to range improvements" within affected allotments. Page S-2 of the Grazing Coordination Plan also reports that the "resource surveys and installation costs associated with these range improvements will be funded by MVE." DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-2. See also DEIS Table App4-2f, Applicant-Committed Measures – Fencing and Range Improvements under Appendix 4 (Mitigation) of the DEIS for details regarding mitigation measures related to range improvements associated with the proposed Project. Notwithstanding, the DEIS omitted consideration and assessment of any alternative or supplemental water developments to mitigate any impacts due to the proposed Project during all phases of the project, i.e., construction, rehabilitation, operation, and decommissioning. It is projected that changes will need to occur to some degree in all phases, though knowing the location of the turbines and other components is just one element. As we have repeatedly stated herein, the timing of each phase and the intended grazing rotation (inclusive of the number of Permitted Use available) for each phase are inexorably intertwined elements to sustain and maintain any livestock operation. A wholly non-existent element in the DEIS is timing, i.e., timing as to advanced notice to Permittees prior to beginning any Project phase; timing as to notice to Permittees when work related to any phase would begin; and timing as to notice to Permittees when any phase would end.	
11204-20	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Lack of information on impacts due to sound pollution, electromagnetic disturbances, micro- environment alterations, changes to cattle distribution and concentration patterns. See 2021 Comments, pg. 18. The 2021 Comments expressed concerns and asked related questions with respect to the potential of the proposed Project to negatively impact the environment within the Star Lake Allotment and disrupt their grazing operations through potential physiological effects to their livestock, as follows: Permittees are informed that each wind turbine will emit sound approximately equivalent to a running lawn mower. Spaced at quarter mile increments there will be a constant drone. How does this affect livestock distribution within the Star Lake Allotment? What effect will increased electromagnetic fields have on livestock and wildlife health and reproduction? Permittees are informed that wind farms reduce precipitation and raise ground temperatures in the immediate area of the project. Is that true? Would that be true on the Star Lake Allotment as to its micro- environment? If yes, how will that be mitigated since that will directly, adversely impact the forage growth on the allotment? It has been found that cattle often cluster around wind turbines (e.g. for shade) where wind energy projects are located in grazing allotments. 2005 FPEIS-Wind, Volume 1, at page 5-57. How will that be mitigated, including any resulting disturbed areas? Permittees are concerned that any disturbed areas would/could likely impact achievement of applicable rangeland health standards. 2021 Comments, pg. 18. The DEIS does not adequately address these issues. Section 3.9.2 of the DEIS addresses potential physiological effects to livestock, and reports that data reviews failed to uncover "enough data on the physiological effects of free-ranging beef cattle and sheep to identify a quantitative measure for effects analysis; therefore, the analysis presents a qualitative discussion based on the best available science." DEIS, pg. 3-289. The DEIS claims that an "in-depth review was conducted on the effects of increased anthropogenic stress catalysts to cattle and sheep, specifically associated with shadow flicker, electromagnetism, noise, vehicle traffic, and a general increase in human presence" which failed to discover any "published literature directly addressing shadow flicker and effects to livestock." DEIS, pg. 3- 289.	Section 3.9.2 (Physiological Effects to Livestock) discusses physiological effects to livestock from construction and operation noise and EMFs, including a summary of available published literature regarding potential effects. Between the draft and final EIS, an additional literature search was conducted and summarized within this section of the final EIS. If new information becomes available regarding physiological effects to livestock from shadow flicker and electromagnetism, the BLM would work with MVE and the grazing permittees to amend the Grazing Coordination Plan (Appendix S in MVE [2023]) to include minimization or mitigation measures. A list of published literature reviewed in preparation of the EIS is provided in the Livestock Grazing citations within EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers). MVE developed the Grazing Coordination Plan in coordination with grazing permittees and this plan could be modified in the future, as deemed necessary by the permittees, the BLM, and MVE. Project effects to vegetation are discussed in Section 3.15 (Vegetation). Also see response to comment 11204-22 (see in Table A-3f, Climate and Greenhouse Gas Emissions) regarding potential changes to ground-level temperatures and humidity levels from turbine operation.

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11204-21	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The DEIS states that "Helldin et al. (2012) do note that there were no documented visual impacts to terrestrial mammals" associated with wind projects, DEIS, pg. 3-289, but qualifies this statement with a finding that "there could be some cumulative effects from multiple wind projects adjacent to each other (size and number of wind projects leading to cumulative effects was not defined)." DEIS, pg. 3-290. Because the proposed Project has the potential to be the largest single wind project yet constructed within the United States, its effects may equal or exceed the cumulative effects from several adjoining smaller wind projects like those that are currently operating. The DEIS claims that electromagnetic fields "do not have a harmful impact to livestock (Burchard et al. 1996; Renaud and Bousquet 1999; Thompson et al. 1995; Wenzel et al. 2020)." DEIS, pg. 3-290. The DEIS reports that information regarding "vehicle traffic impacts to livestock was confined to vehicle transport scenarios with no applicable data on vehicle traffic impacts to livestock adjacent to roads." DEIS, pg. 3-290. The DEIS failed to find any "published research on noise effects to livestock specifically from wind turbines or roads" but did locate several papers that looked at noise impacts "under either intensely managed livestock operations (primarily confined operations) or for similar types of noise disturbances" which concluded that livestock are generally able to acclimatize to noise, "particularly those at less than 100 dB (Ames and Arehart 1972; Arehart and Ames 1972; Bond 1963; Harbers et al. 1975)." DEIS, pg. 3-290. The DEIS also reports that some studies "show some effects to livestock on a short-term basis within a range of 85 to 90 dB or greater; however, these were in confined management areas or buildings (Ames 1978; Broucek 2014 [also identified that farm animals adapt to noise]). DEIS, pg. 3-290. The DEIS reports that a wind turbines' sound power dissipates with distance, would be approximately 73.9 dB at ground level, and "would further dissipate with distance from the turbine." DEIS, pg. 3-290. Similarly, the DEIS reports that the Project's transformers would have a sound power of about 74.8 dB at a distance of 50 feet. DEIS, pg. 3-290. The Permittees assume that all transformers and transformer stations would have exclusionary fencing around their perimeters that would keep livestock and other creatures at least 50 feet away. The DEIS states that regarding the "potential for increased human presence to physiologically affect livestock, no direct research data were found" that analyzed physiological effects" and likewise failed to find research that quantifies livestock stress due to such factors in a "rangeland grazing scenario." DEIS, pg. 3-290. The DEIS concludes that under Alternative B, "impacts from noise, including noise from project construction and operation and recreational vehicles, could occur in nine allotments" but that the "best available scientific information indicates that no other livestock physiological effects would occur; however, many of these effects have not been studied on open-area-ranging livestock." DEIS, pg. 3-291. With respect to noise impacts to livestock, the DEIS concludes that under Alternative B, estimated "construction noise levels in grazing allotments at a distance of 50 feet or more from project activities, would be within the threshold of known information on livestock noise tolerance and adaptability." DEIS, pg. 3-291. The DEIS reports that noise impacts would be somewhat lower under the other action alternatives because of the fewer number of wind turbines that these alternatives would authorize. Thus, the DEIS states that, while noise associated with the proposed Project would be within levels acceptable to livestock, the information to reliably model other potential physiological effects to livestock in a range environment is unavailable. The DEIS errs in claiming to have it both ways, i.e., claiming noise is within acceptable levels, yet simultaneously admitting it lacks the information to support such claim.	The analysis was completed using the best available science. See response to comment 11204-20 (see in Table A-3p, Livestock Grazing).
11204-23	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The 2021 Comments state that it has been found that "cattle often cluster around wind turbines (e.g. for shade) where wind energy projects are located in grazing allotments" (see 2005 FPEIS-Wind, Volume 1, at page 5-57) and expressed concern that "resulting disturbed areas" could negatively impact achievement of applicable rangeland health standards (2021 Comments, pg.18). The DEIS and its associated Appendices only mention the phrase "Rangeland Health Standard" once. This reference to a rangeland health standard is made within Draft Appendix U (Greater Sage-grouse Mitigation Plan) in conjunction with MVE's "plans to purchase GRSG mitigation credits from the TerraWest Conservancy's (TerraWest) Eastern Idaho Greater Sage Grouse Habitat Bank (Habitat Bank), known as the 'Wilcox Ranch Conservation Bank' (WRCB)" (DEIS, pg. 1033, Draft Appendix U, Greater Sage-grouse Mitigation Plan, pg. U-14) and the related livestock grazing and range management goal for the WRCB to "manage livestock grazing in a manner that meets the BLM's Rangeland Health Standard while maintaining the current levels of high-quality greater sage-grouse habitat." DEIS, pg. 1035, Draft Appendix U, Greater Sage- grouse Mitigation Plan, pg. U-16. Thus, the sole DEIS reference to a "Rangeland Health Standard" has nothing to do with the potential for cattle to cluster around wind project infrastructure and thereby impact the ability to achieve applicable rangeland health standards. The DEIS needs to consider and assess the potential for cattle to cluster around the proposed Project's wind turbines which could create "disturbed areas" that could in turn negatively impact achievement of applicable rangeland health standards.	The Grazing Coordination Plan (Appendix S in MVE [2023]) will detail livestock management plans for the project phases. Disturbed sites will be reclaimed following the Reclamation Plan (Appendix E in MVE [2023]). Temporary fencing would be installed to restrict livestock from the project disturbed areas during construction, decommissioning, and reclamation. Review of whether rangeland health standards are being achieved would occur when the BLM reviews permit renewals for each allotment, which is a separate process from this review of MVE's application for a wind generation facility.
11204-25	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	H. Lack of information on status of existing Grazing Preferences and Permitted Use AUMs upon decommissioning if the proposed Project is authorized and results in devotion of the public lands within the Star Lake Allotment to wind energy development, in whole or in part. See 2021 Comments, pgs. 18-19. The 2021 Comments asked if the proposed Project is authorized and results in disposition of or devoting (in whole or in part) the public lands in the Star Lake Allotment to wind energy development, would "the existing Permittees (or their successors or assigns) continue to hold the existing Grazing Preferences and Permitted Use AUMs so to be first-in-line for the allocation [or re-allocation] of the forage within the Star Lake Allotment in the future (2021 Comments, pgs. 18-19)?" The DEIS does not adequately address this question. The DEIS and its associated Appendices never even use the phrases "grazing preference" or "permitted use AUMs."26 The DEIS does not even consider the possibility that the proposed Project could result in the public lands in the Star Lake Allotment (or other proposed Project areas) being devoted, in whole or in part, to a primary use such as wind energy development to the detriment of other multiple-use authorizations. See 43 C.F.R. § 4120.3-6(c) (10-1-2005 Edition). The DEIS reports that Project operation under Alternative B "would not physically preclude any other	Section 3.9.1 (Grazing Allotments and Range Socioeconomics) discusses the affected forage availability (using affected acreage and AUMs) for each action alternative. Livestock grazing permit changes are not part of this action to analyze the project. Any permit authorizations or changes warranted by the EIS ROD will be completed through a separate permit action.

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		permitted uses (e.g., grazing and recreation) from the siting corridors, except where permanent infrastructure is sited (2,374 acres)" with additional work areas during operation and maintenance (6,740 acres) that "would also be unavailable for livestock grazing uses, specifically, due to lack of adequate livestock forage" for a total of 9,114 acres unavailable for livestock grazing during operation and maintenance (DEIS, pg. 3-266). The DEIS then reports in Table 3.8-2 (Construction and Operation Land Use Impacts by Action Alternative) that the acreage unavailable for livestock grazing during operation and maintenance would be somewhat lower under the other action alternatives (DEIS, pg. 3-266).	
11204-26	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Need for MVE to pay for the loss of livestock injured or killed by motor vehicles (2021 Comments, pg. 18) and related Road Issue to reimburse owners for Project-related livestock- vehicle injuries and fatalities. See 2022 Comments, pg. 7. The 2021 Comments noted that the proposed Project initially anticipated the construction of up to 350 miles of new roads across the entire project area to improve access by the applicant (MVE) and expressed concern that these roads would result in much higher travel speeds and increased traffic volume (2021 Comments, pg. 18). The 2022 Comments stated that the Permittees understood that the planned construction "includes construction/improvement of approximately 45 miles of access roads" (2022 Comments, pg.6). Both the 2021 and 2022 Comments expresses concern that the new and improved access roads associated with the proposed Project would endanger livestock and wildlife, especially at night, and asked if the applicant (MVE) would pay for livestock injured or killed by Project-related motor vehicle traffic (2021 Comments, pg. 18; 2022 Comments, pg. 7). The DEIS did not adequately address this issue. Table ES-1 of the DEIS at pg. ES-xi reports that the proposed Project will require 486 miles of new access roads and improvement of 147 miles of existing access roads (including 33 miles of new construction and 14 miles of improvement to existing roads for construction crane paths) under Alternative B, with fewer miles of new and improved access roads required under the other action alternatives (commensurate with the smaller number of wind turbines these alternatives would authorize). Under its discussion of potential noise impacts to livestock, the DEIS states "Applicant-committed measure 33 and mitigation measure N required by BLM policy (see EIS Appendix 4)" which together "establish speed limits on BLM roads and require project personnel to adhere to them, would help reduce the potential for herd displacement and deaths from livestock- vehicle collisions" (DEIS, pg. 3-292). The Grazing Coordination Plan reports that grazing permittees operating within the Project area have identified potential impacts that include livestock death due to: "Project-related vehicle collisions and entrapment within active construction sites" and "general public vehicle collisions, resulting from improved access road conditions and increased vehicle speeds." The Grazing Coordination Plan then reports "MVE is proposing a suite of measures to avoid, minimize, and mitigate the potential impacts to grazing permittees" which would, among other things, "greatly reduce the potential for vehicle-livestock collisions during Project construction, operation, and decommissioning periods…". See DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-1. The Grazing Coordination Plan states that "to reduce the potential for livestock collisions with Project- related vehicles, collisions with general public traffic, reduce livestock stress and disturbance, improve livestock management, and reduce potential construction delays, MVE is proposing the installation of temporary fence (such as electric fence) during construction and reclamation periods" (DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-2). See also DEIS, Appendix 11, pg. App11-16. However, actions that "reduce" potential livestock-vehicle collisions associated with the proposed Project will not eliminate such collisions.	See response to comment 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11204-27	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	B. Permittees requested that cattleguards be installed at all wind Project road crossings. See 2022 Comments, pgs. 6-7. The 2022 Comments requested that "cattleguards be installed by the Wind Company at all road-crossing fences" (2022 Comments, pgs. 6-7). The DEIS does not adequately address this issue. The DEIS reports that either gates "or cattle guards will be installed where openings are needed along range fences" (DEIS, pg. 613 [Appendix 1, Plan of Development, pg. 25]). With respect to the Star Lake Allotment specifically, the Grazing Coordination Plan states that wherever "new project access roads cross existing range fence, MVE will install cattle guards to reduce impacts to livestock operations" and that the road crossings "will be examined on an individual basis once the final road layout is determined to identify the final number and location of cattle guards." DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S-4 (emphasis added). While the Permittees appreciate the commitment MVE has made to install cattleguards whenever "new project access roads cross existing range fence" within the Star Lake Allotment, this does not satisfy the request that "cattleguards be installed by the Wind Company at all road-crossing fences" because there are from 83 to 147 miles of existing roads that are forecast to be improved to provide access to the proposed Project (DEIS, Table ES-1, pg. ES-xi).	See response to comment 11204-19 (see in Table A-3p, Livestock Grazing).
11204-28	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	C. Permittees requested that MVE assumes the cost and obligation to construct and maintain the roads and cattleguards needed in association with the proposed Project. See 2022 Comments, pg. 7. The 2022 Comments requested that the applicant (MVE) "assumes the cost and obligation to construct and maintain" Project-related roads and cattleguards if the Project is approved (2022 Comments, pg. 7). The DEIS does not adequately address this issue. The Grazing Coordination Plan states "MVE is proposing additions and modifications to range improvements within each of the Star Lake, Sid Butte, North Milner, Wildhorse, and Camp I allotments." The Grazing Coordination Plan further reports that "resource surveys and installation costs associated with these range improvements will be funded by MVE." See DEIS, Draft Appendix S, Grazing Coordination Plan, pg. S- 2. However, the Grazing Coordination Plan fails to disclose what party will be responsible for maintenance actions and costs associated with such Project-related range improvements.	See response to comment 11204-19 (see in Table A-3p, Livestock Grazing).
11204-40	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida,	"E. Socio-economic Analysis Related to the Proposed Sheep AUM Reductions	The Grazing Coordination Plan (Appendix S in MVE [2023]) clarifies that sheep grazing can occur in any of the pastures where conflict would not occur with construction activities, at the permittee's discretion. Sufficient AUMs

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	James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The DEIS reports that the “Star Lake allotment would have 100% (1,492 AUMs) of their sheep AUMs made unavailable for the duration of construction and decommissioning” under Alternative B, with smaller sheep AUM reductions under Alternatives C and D (68.3%) and Alternative E (36.5%). DEIS, Table 3.6-13 and text, pg. 3-232; see also DEIS, Table 3.9-3, pg.3-280). Similarly, the DEIS reports that the Star Lake Allotment would have 100% (1,492 AUMs) of their sheep AUMs made unavailable for the duration of “operation and final reclamation (34 to 39 years total, depending on how long it takes to reach reclamation success criteria for grasses and forage for livestock)” under Alternative B, with smaller sheep AUM reductions under Alternatives C and D (68.3%) and Alternative E (36.5%) (DEIS, Table 3.6-14 and text, pgs. 3-233 & 3-234; also see DEIS, Table 3.9-5, pg.3-282). However, within such reports, the DEIS failed to consider and assess the conversion (or already the defacto conversation) of the sheep AUMs to cattle AUMs to mitigate these impacts to a sheep operator or sheep operation. Similarly, again, the DEIS fails to attach any dollar values to these reductions but merely reports them in in terms of magnitude (absolute number) or percentage of sheep AUMs reduced. Furthermore, the DEIS fails to disclose why the proposed Project is so incompatible with the sheep grazing operations in the Star Lake Allotment that it would cause 100% of the sheep AUMs to be unavailable during the entire Project life under Alternative B, or the majority (68.3%) to be unavailable under Alternatives C and D, or more than 1/3 (36.5%) to be unavailable under Alternative E. The failure of the DEIS to disclose why the proposed Project is so incompatible with the sheep grazing operations in the Star Lake Allotment that it would cause 100% of the sheep AUMs to be unavailable during the entire Project life under Alternative B (and significant portions of the sheep AUMs to be unavailable under the other action alternatives) needs to be corrected."	are available to provide grazing for all permitted sheep AUMs. Sheep permittees may need to be accommodated off-site during construction and reclamation at the discretion of the permittee. MVE is also offering alternative forage opportunities for sheep permittees. EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics) has been updated to reflect this revision in the Grazing Coordination Plan.
11211-4	Patrick Kelly	The quality of the habitat in the Project area varies. Nonnative vegetation such as cheatgrass and crested wheatgrass is present in some locations, and some portions of the Project site have been heavily damaged by cattle grazing. Other areas exhibit good quality habitat. Soil loss is of particular concern with this Project because of its soil type. In some portions of the site, pervasive pedestalling around bluebunch wheatgrass and other vegetation, indicates erosion and soil loss from cattle activity. Over time, trampling and concentrated hoof action have disturbed soils in some portions of the Project area and made them vulnerable to wind erosion. These areas still provide wildlife habitat, but the Project’s construction activity will undoubtedly lead to further soil loss, due to the loamy soils. The inevitable disturbance and accompanying soil loss associated with the Project’s construction activities will be additive to the historic and current soil loss directly attributable to livestock activity. If the massive footprint of the wind project is approved, it would be prudent to address and ameliorate as much of the root causes of future soil loss as possible because soil loss on the arid project site is an irretrievable resource in human time. Therefore, as a partial mitigation measure for the Project, we suggest reducing the other major factor contributing to soil loss. This can be done if there are willing sellers and a permanent grazing permit retirement process. Willing seller programs provide economic resources that can be immediately applied to local economies and help livestock producers and their families apply buyout funds to other local enterprises. In order to ensure soil protection and even soil development over geologic time, allotment buyouts and retirements need to be permanent. Appropriate language in the Lava Ridge EIS and Record of Decision would ensure the integrity and permanence of this multiple use application.	As described in EIS Section 3.9.1.1 (Livestock Grazing, Affected Environment, FLPMA (43 USC 1701 et seq.), Public Rangelands Improvement Act of 1978 (43 USC 1901 et seq.), and BLM manual guidance under 43 CFR direct management of livestock grazing on BLM lands. Specifically, the Public Rangelands Improvement Act states, “Except where the land use planning process required pursuant to Section 202 of the Federal Land Policy and Management Act (43 USC 1712) determines otherwise or the Secretary determines, and sets forth his reasons for this determination, that grazing uses should be discontinued (either temporarily or permanently) on certain lands, the goal of such management shall be to improve the range conditions of the public rangelands so that they become as productive as feasible in accordance with the rangeland management objectives established through the land use planning process, and consistent with the values and objectives listed in Sections 1901(a) and (b)(2) of this title” (43 CFR 1903(b). The BLM grazing allotments in the siting corridors were established through the land use planning process, as documented in the *Monument Resource Management Plan* (BLM 1986), subsequent amendments, and the associated Allotment Management Plan. While these laws and policies provide for temporary closure of grazing allotments under certain conditions, permanent reductions in or retirements of grazing allotments (that are not related to the disposal of BLM land) would require the BLM to prepare a new resource management plan or an amendment to the existing plan; any such action would require additional NEPA review. As described in EIS Section 3.13.1.2.2 (Soils, Alternative B), a number of measures would be implemented to minimize or avoid impacts related to soil erosion; see EIS Appendix 4 (Mitigation) for a complete list. Therefore, as stated in EIS Section 3.13.1.3 (Soils, Significance Determination), impacts to soils and plant growth materials would be minimized to an extent that no compensatory mitigation measures are proposed.
11369-1	Julie DeWolfe Arroyo	Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management states, "are to be used as the Bureau of Land Management's management goals for the betterment of the environment, protection of cultural resources, and sustained productivity of the range." page 3. Standard 2 (Riparian Areas and Wetlands) 4. Noxious weeds are not increasing. page 4. Standard 3 (Stream channel/Floodplain) 6. Noxious weeds are not increasing." page 5. Standard 4 (Native Plant Communities) 1. Native plant communities (flora and microbiotic crusts) are maintained or improved to ensure the proper functioning of ecological processes and continued productivity and diversity of native plant species." Standard 5 (Seedings) 1. In established seedings, the diversity of perennial species is not diminishing over time. 3. Noxious weeds are not increasing. page 6. The 18 page STANDARDS for Rangeland Health and Guidelines for Livestock Grazing Management are as those listed above. The Lava Ridge Wind Project will, in every way, negatively impact and destroy the environment and cultural resources, disrupt productivity of the range, plant species diversity, seedings, flora, microbiotic crusts, and in return destroy the fragile balance while increasing noxious weeds. Throughout the DEIS, BLM takes both authority over and responsibility for the proposed Lava Ridge Wind Turbine project area. I see a stark contrast between the existing STANDARD for the management area and the destructive plans of MVE and LS Power, these two issues cannot be reconciled.	The Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management do not apply to wind energy development. The impacts from the proposed wind energy project to livestock grazing, soils, wildlife, cultural resources, vegetation, and other potentially impacted resources are analyzed in the EIS.
11394-2	Roger Johnson	where are the people who have range rights going to feed their cattle.	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases.
11396-2	Gina Jerke	Grazing cattle will be stopped for the ranchers during construction - how will the BLM handle each ranchers' AUM's for the season(s) and will they be allowed to graze cattle elsewhere?	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources.
11442-4	Kalena Kendell, William Kendell	As pointed out by LS Power’s Senior Director of Project Development, Luke Papez, the Magic Valley has “been impacted by multiple wildfires over the past two decades. It's not in its native state any longer," Papez said. "We saw that as a good factor to try to bring this type of infrastructure into that altered environment." To address the	Livestock impacts are discussed in EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics). The Grazing Coordination Plan is Appendix S in MVE (2023). Grazing would only be temporarily unavailable in the construction (or decommissioning) sites and work areas until these areas are reclaimed, estimated at two

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		first point made by Papez: The land covering the proposed project area is prone to wildfires. The area has burned before, and in the dry, remote, and rocky area, cattle grazing seems to be perhaps the area's main preventative defense (at least, controllable defense) against wildfires. Every windmill farm that we have ever driven past is fenced off. There is a perimeter around the groupings of windmills so that cattle or other livestock cannot graze directly around the windmills. With such a large- scale project proposal in this dry and fire-prone area, we are left to wonder how LS Power in partnership with the BLM intends to limit the lands fire susceptibility by adding windmills to the area. It seems to me, that such infrastructure blocking out the ability for cattle to graze on large sections of dry grass will only increase fire hazard in the area. Idaho already has a fire issue. Every year, acres of forest and grassland burn. Magic Valley Energy's construction of the Lava Ridge Wind Project will only add to the issue. Where fire prevention via cattle grazing will be affected negatively, there is also the concern of fire management in the inevitable event of a fire near the windmills. Windmills that are the height of 2.5 football fields prevents effective arial firefighting. Arial firefighting is one of the most effective methods we have in modern fire management with less lives endangered.	growing seasons following construction (or decommissioning). These areas are predicted to have substantial portions of their vegetative cover (i.e., fuels) removed for project construction. Thus, grazing not occurring in these areas during construction would not lead to increased fuel loading. Any temporary changes to grazing would only occur during construction (or decommissioning). Any temporary changes to grazing should not yield meaningful impacts to fuel and fire dynamics in the project area. The EIS has also been revised to include additional discussion on decreased aerial wildfire suppression efficiency and fire risk from wind turbines.
11481-1	Idaho Wool Growers Association	The Idaho Wool Growers Association (IWGA) was established in 1893 as the primary voice for the sheep industry. Our members raise and run sheep across Idaho on private, state and federal lands. Currently, the sheep industry in Idaho accounts for approximately 220,000 animals with a large portion of those animals grazing on public land. The IWGA is OPPOSED to Alternatives B through E of the Lava Ridge Wind Project. These alternatives would reduce Animal Unit Month (AUMs); likely displace sheep from their offspring; reduce the ability to utilize aircraft to control predators and fight fire; and potentially displace members who utilize allotments to lamb out their bands of sheep.	See responses to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11481-3 (see in Table A-3o, Land Use and Realty, including Aviation).
11481-4	Idaho Wool Growers Association	IWGA is concerned that if the project is too concentrated with road infrastructure, it could create the opportunity for those utilizing the roads for recreation to unintentionally separate ewes and their offspring thus having harmful effects for the offspring and producers.	Road impacts are discussed in Section 3.9 (Livestock Grazing) and applicant-committed measures are discussed in the Grazing Coordination Plan (Appendix S in MVE [2023]).
11491-21	Dean Dimond, Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: [...] 29. Full disclosure of data as to effects of 30-year project approval on current and future grazing viability pursuant to the Taylor Grazing Act and actual effects on ranching and wool growing in this project area, [...]	Livestock grazing impacts to allotments and livestock are analyzed in Section 3.9 (Livestock Grazing) and Section 3.9.1 (Grazing Allotments and Range Socioeconomics). The Section 3.9.1 analysis evaluates impacts to the livestock grazing economy and community. Impacts were estimated in the final EIS using actual AUMs used by grazing permittees and anticipating the potential for impacts during project construction, operation, and decommissioning.
11496-1	Danielle Gunn	I am a permittee on the Sid Butte allotment and would be directly impacted by this project. Upon review of the DEIS, I concluded this project will have several irreversible effects on the public lands in the proposed project area. One major effect would be primarily on agricultural uses, specifically, livestock production. Livestock production is the largest essential use of this acreage and is a necessary requirement for basic survival of humankind. Our country is experiencing a drastic, rapid reduction in open space needed for food production as more natural landscapes become developed and inhabited by a rapidly increasing population. Thus far, the United States agricultural industry has developed the technology and tools to continue meeting the increased demand for food. However, how far can technology push the environment to continue producing more pounds of food per acre to meet the needs of such rapid population expansion? This project will result in habitat loss, alterations, and fragmentation of this landscape. Many resources will be affected by the project regardless of measures taken to mitigate and/or minimize negative impacts. For these reasons, it is imperative for all parties involved and/or directly impacted by the project to carefully analyze the alternatives identified in the DEIS with logic and forethought for preserving agriculture, natural and cultural resources, sensitive areas, and open space while meeting the power needs of society. The DEIS cites little to no research about the impacts of wind turbine effects on livestock and wildlife. How do shadow flicker, additional noise and traffic, and disruption impact livestock and wildlife physiological responses? Research is needed to fully understand impacts on wildlife and livestock to make informed decisions and better mitigate the negative effects of large-scale wind energy projects.	Chapter 3 analyzes impacts of the project to resources present in the analysis areas, including those associated with wildlife, environmental justice and socioeconomics, cultural resources, fire and fuels management, livestock grazing forage and physiological effects, vegetation, and visual resources. A review of physiological effects to livestock, using best available science, is located in Section 3.9.2 (Physiological Effects to Livestock). Also see response to comment 11204-20 (see in Table A-3p, Livestock Grazing).
11496-3	Danielle Gunn	Our current knowledge and understanding of wind turbines indicate that this project could affect: • Natural resources • Livestock and wildlife health • Livestock and wildlife reproduction • Livestock and wildlife behavior and physiology/endocrine system impacts • Forage production • Access venues for individuals and groups that may display disrespect for animals, the land, and other natural resources. • Fire cycles due to increased human activity. • Range health through the introduction of invasive plant species and increased traffic. • Potential loss of native species • Aesthetic and emotional appeal The DEIS needs to provide more information on the above issues along with sustainable solutions.	Chapter 3 (Affected Environment and Impacts) of the draft EIS analyzes impacts of the project to resources present in the analysis areas, including those associated with wildlife, cultural resources, fire and fuels management, livestock grazing forage and physiological effects to livestock, transportation, vegetation, and visual resources. EIS Appendix 4 (Mitigation) details measures that avoid, minimize, or offset via compensatory mitigation the potential project impacts to these resources.
11496-5	Danielle Gunn	The DEIS calls for a reduction of livestock AUMs on Sid Butte and Star Lake allotments. However, communication with MVE indicates this would not be necessary for any permittee who wishes to remain on either allotment. It is imperative that the final EIS reflects no AUM reduction. Permittees should not be forced to reduce their AUMs, nor should they be forced to modify their grazing permits. If the Coordinated Grazing Plan is followed, forage production should remain at or above current levels. Additional pasture development through standard fencing practices or even virtual fencing on affected allotments will result in improved use of forage and water and could potentially increase the current forage production. There is absolutely no need to reduce AUMs. Further, reducing AUMs and modifying grazing permits could be viewed as a violation of the Taylor Grazing Act. There has also been discussion about permittees selling AUMs to MVE. If permittees want to sell their AUMs to MVE, other permittees should have the option to purchase or lease the AUMs. Overall, AUM reduction would	See response to comment 11204-13 (see in Table A-3p, Livestock Grazing). Livestock grazing permit changes are not part of the project. Permit authorizations or changes would be completed through a separate permit action. No permanent AUM permit reductions are evaluated in the alternatives as part of this project. The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including that all project fencing would be temporary and MVE would commit to providing alternative feed sources. See the affected acreage and AUM tables in Section 3.9.1 (Grazing Allotments and Range Socioeconomics).

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		have a significant negative impact on the livestock industry in these communities and increase fire hazards through loss of a key tool necessary for fuel reduction on rangeland. In relation to AUM reductions, the DEIS also calls for a significant reduction in acres for the affected grazing allotments. Every effort needs to be made to reduce affected acres and minimize the project's footprint.	
11496-8	Danielle Gunn	The final EIS needs to define the re-establishment period of five years and how that will impact livestock grazing. As written, I do not understand how re-establishment will impact livestock grazing practices or other land uses. In addition to decommissioning activities, areas that have been re-seeded typically are rested for two growing seasons as per federal guidelines, why is the DEIS calling for five years for re-seedings to establish? What impact will the re-seeding period have on livestock grazing?	Within the BLM public lands managed by the SFO, resumption of grazing typically occurs after two growing seasons following reseeding and reclamation efforts. MVE's Reclamation activities would up to 5 years of monitoring to confirm achievement of reclamation "success" objectives as defined by the BLM (applicant-committed measure 163). Reclamation of disturbed vegetation communities, with the exception of those with limited reclamation potential, is estimated to successfully revegetate to the point where livestock forage would be available, based on other reclamation efforts in the field office; see Section 3.9.1.2.2 (Alternative B [Proposed Action]). However, depending on the level of soil structure disturbance, soil type, ecological site, seed mix, and climate conditions, it could take additional years to meet success criteria. Minor post-project acreage losses are proposed as part of this project, which are being analyzed in this EIS. MVE has committed to prevent the introduction or spread of noxious weeds and invasive species (see applicant-committed measures in Table App4-2k). The Noxious Weed Management Plan (Appendix R in MVE [2023]) will be implemented for the project. The BLM, along with the MVE-provided rangeland coordinator, will be points of contact for permittees during the project construction phase. The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the management approaches for livestock grazing during the project.
11498-1	David Bateman	I am writing to express my concern about the lack of a comprehensive analysis of the effects of the Lava Ridge Wind Farm on grazing animals in and around the project area. While wind farms can bring many benefits, it is important to consider the potential impacts on the health and well-being of grazing animals in the area. Studies from other wind farms have shown that grazing animals can experience negative impacts, such as stress and reduced reproductive success, due to the noise, ground disturbances, fencing, and visual disturbances caused by wind turbines. It is crucial to conduct a comprehensive analysis of the potential impacts on grazing animals to ensure that their health and well-being are not compromised by the wind farm. One study that highlights the importance of such an analysis is the study of the effects of wind farms on livestock in Australia. This study found that grazing animals near wind farms showed increased levels of stress and reduced reproductive success due to the noise and visual disturbances caused by the wind turbines. The study concluded that a comprehensive analysis of the potential impacts on grazing animals was necessary to ensure that the wind farm did not compromise the health and well-being of the animals. Another study that underscores the need for a comprehensive analysis of the impacts on grazing animals is the study of the Cedar Creek Wind Farm in New York. This study found that grazing animals near the wind farm experienced changes in grazing behavior and reduced body weight due to the noise and visual disturbances caused by the wind turbines. The study concluded that a comprehensive analysis of the potential impacts on grazing animals was necessary to ensure that the wind farm did not compromise the health and well-being of the animals. Given these examples and the potential impacts of the Lava Ridge Wind Farm on grazing animals in the area, I urge you to conduct a comprehensive analysis of the potential impacts on the health and well-being of grazing animals. This analysis should include an evaluation of the noise, ground disturbances, fencing, and visual disturbances caused by the wind turbines and an assessment of the potential effects on grazing behavior and reproductive success. Thank you for your consideration of this important issue.	Section 3.9.2 (Physiological Effects to Livestock) discusses physiological effects to livestock in the analysis area. Effects to livestock outside the project area are outside the scope of this EIS analysis; however, it would be expected that impacts would be less than those described for the analysis area due to the greater distance of livestock located outside of the analysis area.
11508-7	Justin Gott, Daniel Gott, Josie Gott	Grazing cattle and sheep would cease on these acres. This a large grazing area for our local cattle and sheep ranchers and and has been for over a 100 years.	Livestock grazing will continue as outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]).
11527-11	Richard Stover; State of Idaho	The FEIS must address and consider an extended Project time frame regarding grazing lessees.	Impacts to grazing allotments are included in EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics). Livestock grazing management will continue through the project as outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]).
11535-117	Steven Andersen	Electromagnetic Fields and Low-Frequency Noise Effects on Wildlife and Terrestrial Animals Many farmers in the area rely on livestock for their livelihood. The above referenced studies indicate negative impacts of inaudible noise, including infrasound and low frequency noise on terrestrial animals. There needs to be a hard look into the impacts on cows in a rural setting, measuring daytime and nighttime ambient noise and ground vibrations (in the specific type of lava-rock found in the proposed project area) with sufficient sampling. Dairy cows are sensitive to their environment, and farmers throughout the world have reported "profound stress" caused by vibrations passing through the subsoil, which has caused a drop in milk production. Additionally, the noise impacts extend to animals and should not be discounted. Environmental stressors influence organismal biology, specifically, the endocrine system, of dairy and beef cattle.339 Such stress causes disease susceptibility, productive and reproductive performance issues and a decrease in milk production in dairy cows.340 The cumulative impacts of electrical and magnetic fields were not adequately studied in the DEIS. Specifically, similar projects with related studies have indicated a direct and demonstrable link between electromagnetic field strength and impacts on terrestrial animals. These direct impacts include behavior changes when in proximity to, or when crossing over, electromagnetic fields. Further, the addition of a transmission line within the right of way and the predicted impact of adding interconnection should be evaluated to determine the impact on field-exposure strength. Specifically, a study was conducted on the impacts to dairy cows and concluded exposure to electromagnetic fields resulted in increased progesterone and dry matter intake. 341 Additionally, exposure to electromagnetic fields has been	See response to comment 11204-20 (see in Table A-3p, Livestock Grazing). A literature review did not identify any publicly available literature indicating that vibration from operational turbines can significantly impact livestock. Concerns with vibration from wind turbines are primarily related to the generation of low-frequency noise (also known as infrasound). Although research in this area is limited, the predicted effects of infrasound are similar to those for noise at audible frequencies (Lovich and Ennen 2013). Section 3.9.2 (Physiological Effects to Livestock) provides a disclosure of potential construction and operation noise impacts to livestock. Lovich, J.E., and J.R. Ennen. 2013. Assessing the state of knowledge of utility-scale wind energy development and operation on non-volant terrestrial and marine wildlife. *Applied Energy* 103(2013):52–60.

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		studied and shown to have a negative impact on dairy cows' milk production.342 The disturbance caused by the construction and operation of wind turbines can cause stress and anxiety in cattle, which can lead to behavioral changes such as reduced grazing, increased aggression, decreased socialization, a reduction in milk production and hormonal imbalances, leading to disruptions in reproductive and metabolic functions.	
11535-133	Steven Andersen	The DEIS recognizes the irreparable impact that this project will have on farmers and their livestock but does nothing to mitigate. The DEIS states "[t]he degree to which the broader livestock grazing community would be affected depends on the magnitude and duration of AUM reductions, as well as the communities' economic and social resiliency and flexibility."385 Moreover, it asserts "[p]ost-project (i.e., after final reclamation is complete), some areas could remain permanently unavailable (irreversible commitment) for livestock grazing because they would not be reclaimed (e.g., access roads) or because they would have limited reclamation potential for forage." 386 The DEIS glosses over the applicable communities' economic and social resiliency and lack of flexibility as to livestock grazing. In effect, it asserts an irreversible commitment without describing the extent to which the local livestock industry may be devastated. Additionally, it repeatedly estimates that final reclamation is estimated to be up to 5 years, but it does not provide support for that estimation.387 Moreover, even if a 5-year period is accurate as to livestock forage, the actual effect on livestock will linger longer.	Section 3.6 (Environmental Justice and Socioeconomics) evaluates the impacts of the project to local and regional social and economic functioning. Reclamation of disturbed vegetation communities, with the exception of those with limited reclamation potential, is estimated to successfully revegetate to the point where livestock forage would be available, based on other reclamation efforts in the field office; see Section 3.9.1.2.2 (Alternative B [Proposed Action]). However, depending on the level of soil structure disturbance, soil type, ecological site, seed mix, and climate conditions it could take additional years to meet success criteria.
11535-134	Steven Andersen	Much of Idaho's livestock industry relies on rangeland ecosystems for summer grazing and feed crops. Along with existing climate trends, the addition of this project could drastically harm livestock and grazing production. A case study by Wold et al. (2022) showed the economic impacts of drought on a ranching operation in south-central Idaho.390 Wold et al. found that the forage reductions caused by a 5-year severe drought resulted in a 10% reduction in herd size.391 A 10-year moderate drought resulted in a 4% reduction in herd size, both of which persist for up to 10 years after the end of the drought. 392 For a 300-head operation, a 10-year moderate drought resulted in a 16% reduction in average annual ranch income (an annual loss of ~$14,000 during the drought).393 And for a 300-head operation, a 5-year severe drought resulted in a 28% reduction in average annual ranch income (an annual loss of ~$23,000 during the drought).394 These impacts would be devastating when combined with the effects of this project given its magnitude and unprecedented uncertainty.	See Section 3.9.1 (Grazing Allotments and Range Socioeconomics) for a description of effects to the livestock economy.
11535-135	Steven Andersen	Likewise, the spread of invasive plant species in rangelands reduces forage availability for livestock operations. Julia et al. (2007) estimated the economic impact of yellow star thistle to Idaho's agricultural industry.395 Assuming an infestation of 266,000 acres, the yellow star thistle invasion reduced available forage for livestock by 221,858 AUMs per year.396 The direct and secondary (induced) economic impacts of the infestation to the agricultural sector were $10,124,000 per year (in 2005 USD). This is merely an estimate of one type of invasive plant species.397 The project could result in the spread of any number of invasive plant species even with the MVE-proposed mitigation efforts.	MVE has committed to prevent the introduction or spread of noxious weeds and invasive species (see applicant-committed measures in Table App4-2k). The Noxious Weed Management Plan (Appendix R in MVE [2023]) will be implemented for the project.
11535-136	Steven Andersen	Moreover, this project increases the potential for wildfires on and around livestock foraging areas. Increasing frequency and severity of wildfire events on rangeland ecosystems can create short- and long-term reductions in the quantity of forage available.398 Following a wildfire, public grazing allotments are closed for several years, meaning summer forage must come from an alternate source. Establishment of invasive annual grasses and the replacement of native vegetation with noxious weeds after a wildfire event can further reduce forage availability in the long-term. 399 Maher et al. (2013) simulated the economic impacts to a representative livestock producer from shortened wildfire return intervals and wildfire occurrence on a public grazing allotment.400 The results showed that after a wildfire, herd size is reduced by up to 40% due to reduced forage availability.401 In the years just after a wildfire event, ranch income is reduced by up to $60,000 and often requires short-term borrowing of up to $20,000.402 The likelihood of bankruptcy after a wildfire event on a grazing allotment is 22%, assuming average beef prices.403 The DEIS does not contemplate these economic effects.	See responses to comments 11442-4 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1). Wildfire potential is analyzed in Section 3.7 (Fire and Fuels Management). Potential qualitative impacts to the livestock grazing economy and community, is analyzed in Section 3.9.1 (Grazing Allotments and Range Socioeconomics). The Noxious Weed Management Plan (Appendix R in MVE [2023]) would be implemented as part of the project.
11535-137	Steven Andersen	The DEIS asserts that project noise could result in an effective loss of forage to livestock, but any impact is "not quantifiable because of the variability of how livestock may react to noise, availability of the forage at these locations, and active construction progression."404 Although such an impact may not be quantifiable, it is well documented that noise has a profound impact on livestock and wildlife.405 Accordingly, the DEIS, at a minimum, should assume that the impact from noise will render more a greater loss in livestock foraging area. Along with this basic assumption, the DEIS should conduct further assessment to quantify the direct effect of sound on individual livestock forage areas.	See response to comment 11204-20 (see in Table A-3p, Livestock Grazing).
11535-165	Steven Andersen	There is no analysis in the DEIS as to the impact of stray voltage on nearby animals, including dairy cows in the close vicinity of the proposed project. Stray voltage is known to affect dairy cows' appetites and significantly hurt milk production.443 The proposed massive project is in close proximity to large dairy farms, wholly reliant on their cows' health and milk production, in order to stay in operation. The exact point of interconnection has not been determined and there are insufficient specifics with reference to maintenance of electrical equipment, wire insulation and isolation practices intended to address the issue of stray voltage.	The POI would be fenced to avoid potential impacts to livestock at the interconnection. Interconnection would occur at the Midpoint Substation or along the SWIP-North. Also see response to comment 11204-20 (see in Table A-3p, Livestock Grazing). These additional literature summaries were added to the final EIS: "Three studies specifically researched livestock grazing under high-voltage transmission lines and concluded that the animals experienced no health problems associated with exposure over long-term periods (Amstutz and Miller 1980; Algers and Huntgren 1987; Angell et al. 1990). Additional studies, which exposed pregnant livestock to stray voltage and EMFs in control groups observed slight behavioral stress responses but not of a magnitude that would be attributed to a health hazard. Electric and magnetic fields do not have a harmful impact to livestock (Burchard et al. 1996; Renaud et al. 1999; Thompson et al. 1995; Wenzel et al. 2020). One study focused on the effects to livestock via stray voltage applied to the water trough and found that the exposure could be a mild stressor immediately after exposure but no impairment or impact on production was found (Rigalma et al. 2010)."

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			Burchard, J.F., D.H. Nguyen, L. Richard, and E. Block. 1986. Biological Effects of Electric and Magnetic Fields on Productivity of Dairy Cows. *Journal of Dairy Science* 79:1549–1554. Renaud, F., D. Goulet, and R. Bousquet. 1999. *Effects of Electric and Magnetic Fields on Livestock Health and Productivity*. Hydro-Quebec. Thompson, J.M., F. Stormshak, J.M. Lee Jr., D.L. Hess, and L. Painter. 1996. Cortisol secretion and growth in ewe lambs chronically exposed to electric and magnetic fields of a 60-Hertz 500-kilovolt AC transmission line. *Journal of Animal Science* 73:3274–3280. Wenzel, J., M. Ward, C. Gifford, and S. Cox. 2020. *Electromagnetic Fields and Livestock Production*. Guide B-129. New Mexico State University College of Agricultural, Consumer, and Environmental Sciences.
11552-3	Summer Osmond	The reduction of grazing will increase the risk of wildfire in this great area, in addition to the economic loss to local ranchers who depend on the use of public lands for grazing.	Livestock impacts are discussed in Section 3.9 (Livestock Grazing). Grazing coordination and planning is discussed in the Grazing Coordination Plan (Appendix S in MVE [2023]). Grazing would only be temporarily excluded in the construction sites and work areas. These areas are predicted to have substantial portions of their vegetative cover (i.e., fuels) removed. Thus, grazing exclusion should not lead to increased fuel loading. Any temporary changes to grazing would only occur during construction and decommissioning. These temporary impacts to grazing should not yield meaningful impacts to fuel and fire dynamics in the project area.
11554-9	Raul Labrador; Idaho Attorney General's Office	Seventh, the Project will also interfere with Idaho's ability to promote its cattle and ranching industry. See Idaho Code § 22-103(4) (requiring the Idaho Department of Agriculture to "[e]ncourage and promote in every practical manner, the interests of agriculture [and] the livestock industries.").	Livestock grazing will continue as outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]) and as outlined in BLM guidelines following FLPMA.
11563-1	Idaho Cattle Association	the Idaho Cattle Association (ICA) submits the following comments on the Lava Ridge Environmental Impact Statement (EIS). ICA has clear policy that requires us to oppose any effort that would reduce the amount of grazing and available animal unit months (AUMs) on federal land. We are opposed to any permanent reduction in AUMs for existing grazing permittees and lessees. To the extent that the proposed massive Lava Ridge wind development has the potential to impact the ability of cattle producers in the area to pursue their livelihoods and restrict the use of their BLM grazing permits, we have concerns with the project. The most immediate concern is the displacement of livestock grazing AUMs during construction of the project. The uncertainty for ranchers about how they will feed their livestock, combined with the uncertainty of the duration of construction timeframe is very concerning. We understand that Magic Valley Energy has been working with permittees to find alternate forage and appreciate that effort, but it is unlikely that there are adequate alternative pasture sources for that quantity of livestock within a reasonable vicinity and in a way that won't unduly disrupt their livestock operations. With the significant volume of roads that will be constructed and then left permanently in place for turbine maintenance, there will be a permanent loss of available AUMs. The decrease in AUMs post construction is not only unnecessary but also an inaccurate representation of the forage that will be available, particularly with the rangeland restoration and mitigation efforts that are supposed to occur. The EIS provides for the development of some much-needed range improvements, which we support, but it is frustrating that increased AUM availability was not analyzed as part of this EIS process.	See responses to comments 11204-14 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11563-2	Idaho Cattle Association	the Idaho Cattle Association (ICA) submits the following comments on the Lava Ridge Environmental Impact Statement (EIS). [...] The impacted area of development is a high fire-frequency area. During construction, the reduction of grazing of fine fuels combined with increase of vehicles in the area exponentially increases the potential for a greater prevalence of wildfires. Post construction, the enormity of the wind turbines could prevent sufficient aerial attack on wildfires in the area. Additionally, significant fire risk will be created by the permanent increase of recreators and travelers that will be on the road system put in place for turbine management. We also have concerns about the strain the additional infrastructure, and required protection of it, will place on wildland firefighting efforts. Ranchers invest their own time and resources in protecting BLM land from the threat of fire in order to protect their own and their neighbors' livelihoods, their communities, and the landscape. It is most likely that the new infrastructure and wind turbines would certainly become a priority for requiring firefighting resources in the certain event of wildfire. We are concerned about more infrastructure in high fire frequency areas which would divert firefighting resources away from the rangeland and toward protecting the wind development.	See responses to comments 11442-4 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11563-4	Idaho Cattle Association	the Idaho Cattle Association (ICA) submits the following comments on the Lava Ridge Environmental Impact Statement (EIS). [...] All BLM land in Idaho provides habitat for wildlife and a significant portion for sage grouse. It is nonsensical to, on the one hand, be working towards conserving sage grouse habitat while on the other to be promoting projects that will obliterate that habitat. The cattle industry has undertaken significant effort to promote sage grouse habitat in harmony with sound grazing management practices, even while proper grazing is not considered a threat to the species. We are very concerned that if utility-scale energy projects are developed on BLM lands, the surrounding landscape will be used for mitigation of that massive impact. As if often the case, grazing permittees often bear the brunt of such efforts. Any reductions in grazing or changes in grazing management which limit livestock numbers or seasons of use, whether in the specific project area or outside of it, in the name of mitigating for energy development impacts will be unacceptable.	The BLM operates under a multiple use mandate through FLPMA, which states that resources and uses on public land must be used in a balanced combination that will best meet the needs of the people. This EIS analyzes the impacts of implementation of the project, which is an additional multiple use.
11563-5	Idaho Cattle Association	the Idaho Cattle Association (ICA) submits the following comments on the Lava Ridge Environmental Impact Statement (EIS).	The EIS evaluates potential impacts to plants in Section 3.15 and wildlife in Section 3.18. See also response to comment 11204-13 (see in Table A-3p, Livestock Grazing).

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		[...] The immense size of the project is concerning. As mentioned above, the massive infrastructure will affect wildlife and plant communities. Yet, despite this, the environmental review process has been fast-tracked. It is frustrating that BLM grazing permittees have difficulties in getting approval to undertake minimally invasive management actions (i.e., hauling water to cattle, maintaining water and other range improvements, fixing fence, etc) yet a project covering 76,000 acres with miles of new roads and construction of enormous infrastructure is being has been on an accelerated path for approval with seemingly little regard to its environmental impacts relative to its impacts. The BLM's rapid timeline to achieve the required environmental review process, particularly on a project of this size and potential for negative impact, is concerning. It is particularly frustrating to our industry that a project of this scope can move through the process so rapidly while much smaller NEPA review, such as grazing permit renewals, have been stalled for years. Further, we have heard that some grazing-related reviews have been intentionally put on hold in order to fast track review of the Lava Ridge Wind Project.	
11576-4	Kelly Human	What are the potential direct impacts of blasting and the frequency of blasting twice per day on average for the two-year construction period on wildlife species flying and on the ground species. What about the impacts on cow calf operations holding grazing privileges and permits in the area? How long does it take to acclimate Livestock to blasting and the noise of turbines?	Impacts to avian and terrestrial wildlife from blasting are described in EIS Section 3.3.3 (Eagles) and Section 3.3.4 (Greater Sage-Grouse) and AIB-2 and AIB-56 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). See response to comment 12351-7 (see in Table A-3p, Livestock Grazing).
11615-4	Spencer Dixon	Ranchers that have to leave their leases for 2 years will lose their livelihood and likely their herds. You cannot "pause" a ranching operation. The cows need feed and the ranchers' rights to the land supersede magic valley energy. This is not considered in the EIS.	See response to comment 11204-13 (see in Table A-3p, Livestock Grazing).
11860-9	Shauna Robinson	The information in the DEIS about the history of sheep trailing in the proposed project area is inadequate. Since the late 1800s, livestock have been important to the industry and tradition of southern Idaho. Today, the SFO website describes this tradition as "part of the historic fabric in this area" with hundreds of allotments and permittees. The description continues with the fact that the "Shoshone Field Office has the most livestock crossing permits in Idaho," and that "trailing occurs across 87 allotments for a total of 366 trailing events; permittees often use historic trail routes that date back decades." When I asked in a RAC Subcommittee meeting about the sheep trailing routes across a potential construction area for the wind project and how the BLM would provide for the herders and impacted routes, the response was for the herders to simply find another route. There seemed to be a lack of concern toward the trailing.	Sheep trailing is an authorized use in the allotments with sheep AUMs or where this action has been authorized via the BLM (2013) livestock trailing EA. See EIS Section 3.9.1. Sufficient AUMs are available to provide grazing for all permitted sheep AUMs. Sheep permittees may need to be accommodated off-site during construction and reclamation at the discretion of the permittee. MVE is also offering alternative forage opportunities for sheep permittees. During project phases, sheep trailing could continue to occur across the project area, although they may need to avoid active work areas. The BLM would prioritize avoidance of physical impacts to any historic trails within the authorized project ROW that meet the National Register of Historic Places eligibility criteria. For more information on potential impacts to historic trails, see EIS Section 3.5 (Cultural Resources) and Appendix 6 of EIS Appendix 8. BLM. 2013. 2013 Shoshone Field Office Livestock Trailing Permit EA. Available at: https://eplanning.blm.gov/eplanning-ui/project/34006/570. Accessed January 19, 2024.
11873-15	Mary Schwartz, Frank Schwartz	17. The DEIS does not address some aspects of the impacts to livestock grazing. The analysis attempts to portray that displacement of livestock from normal grazing allotments use can be mitigated with compensation to allotment owners/permittees for the construction period as well as other periods where there is a loss of use. One factor that this does not take into account is that grazing allotments are an integral part of many livestock operations and annual ranch management planning. The grazing allotment use is not like a light switch that can be turned on off or on at will. The inability to use allotments, either temporarily, or in some cases, portions will be permanently lost, has a significant impact on the ranch operation and the annual planning. In the event an allotment area cannot be used in a given year, the rancher must find alternate range for whatever period the displacement will include. Availability of alternate range is most often a challenge. Availability of short-term alternative pastures in reasonable proximity to the normal range, such as that which will be necessary during the wind farm construction period, could be a problem. Further, the need for these alternate pastures could negatively impact other ranchers in addition to the affected permittees. And then there is the impact to the actual livestock and their productivity. Cattle and sheep learn pastures, including water, through use. Moving them to a different location which they have never used previously will result in inefficiencies and lost gain, likely for at least a full grazing season. This is a cost to the rancher, in addition to all other costs associated with finding and using an alternate pasture. Is the BLM intending to provide (and guarantee) the alternate range that will be needed during the project period? There are a number of these types of issues that accompany the displacement of livestock from their traditional range, that the DEIS analysis and mitigation planning has not addressed, and must be considered.	MVE has committed to providing alternative feed sources during the construction and reclamation phases for AUMs that are unavailable, as noted in the Grazing Coordination Plan (Appendix S in MVE [2023]). Additional text has been added to Section 3.9 (Livestock Grazing) to disclose potential impacts from moving livestock to alternate ranges.
11978-36	Magic Valley Energy, LLC	Section 3.9.2.3 – Blasting and Noise Impacts on Livestock Grazing 32. The DEIS states: "There would be potential irretrievable physiological effects to livestock from the construction and decommissioning equipment noise and blasting. These phases are each estimated to have a 2-year duration at the beginning and end of the project. There would also be potential longer-term (30 years) irretrievable physiological effects to livestock from the turbine noise during project operation." a. MVE Comment: The conclusion reached in Section 3.9.2.3 is not fully supported given the analysis of livestock leading up to this point. Physiological impacts to livestock, which are generally related to noise impacts, would likely be avoided during construction and decommissioning since disturbances would be limited to small areas throughout the Project and livestock can distance themselves from the disturbance areas. Similarly, during operations, noise will have little to no effect on livestock, considering livestock often congregate within the shade of turbine monopoles to escape the sun's heat16. In the event noise from a nearby turbine becomes a nuisance, the DEIS notes that livestock can simply move further than 50 feet away to avoid such concerns. Regarding any physiological impacts associated with feed or water, MVE has an	Although livestock can move 50 feet beyond transformers, there is still a potential irretrievable operational impact to livestock within 50 feet of the transformers. However, the noise levels on the ground at the turbine hub and below the blades is less than the threshold for livestock impacts, as determined in the literature review in Section 3.9.2 (Physiological Effects to Livestock). The last sentence about physiological effects to livestock from turbine noise has been removed. The language in Section 3.9.2.3 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) has been edited to clarify, "Irretrievable physiological impacts on livestock related to construction and decommissioning equipment noise and blasting is not anticipated given that temporary fencing would keep livestock greater than 50 feet away from equipment noise and 75 feet away from blasting. There would also be potential longer-term (30 years) irretrievable physiological effects to livestock not moving beyond 50 feet from transformers during project operation. It is possible that long-term operational exposure to EMFs could have irretrievable physiological impacts to livestock, not enough is known at this time to preclude these impacts."

Comment ID	Commenter	Public Comment	Response to Comment
		applicant-committed measure to provide equivalent feed source to grazing permittees for AUMS unavailable during construction and decommissioning, and an applicant- committed measure to add water troughs throughout grazing allotments, should linear disturbances reduce pathways to previous water sources. MVE suggests that this section be reworded in light of these facts as: “Irretrievable physiological impacts on livestock related to construction and decommissioning equipment noise and blasting is not anticipated given that livestock can move away from nearby work areas. Similarly, irretrievable physiological effects to livestock are not anticipated during operations because livestock can move outside of 50 feet from the turbine to reduce noise if needed.”	
11978-37	Magic Valley Energy, LLC	Section 3.6.5 – Livestock Grazing Economy 33. MVE Comment: The FEIS should note that MVE has worked extensively with project area grazing permittees to understand their current permits and operations and to avoid, minimize, or mitigate impacts that the Project will have on them. These efforts include repeated consultations with permittees regarding MVE’s Grazing Coordination Plan, found as Appendix S of the MVE POD. Other mitigation for fencing and range improvements are found in DEIS, Appendix 4, Table App4-2f. MVE has particularly focused on concerns raised by Star Lake Allotment permittees. Star Lake permittees could see 2.5% to 5% of cattle Animal Unit Months (AUMs) made unavailable during construction and decommissioning (DEIS Table 3.6-13) and 0.7% to 1.3% of cattle AUMs during operation and final reclamation (DEIS Table 3.6-14). The permittees’ comments were used to modify the Grazing Coordination Plan. MVE worked with other permittees to make their AUMs available to Star Lake permittees for any AUMs that may be displaced by the Project. MVE has repeatedly offered to meet with Star Lake permittees to further address any remaining concerns and facilitate allocation of AUMs by BLM to address those concerns. This effort is consistent with BLM’s strong encouragement of MVE/rancher agreements to address lost use of AUMs and compensation for lost range improvements, consistent with IM 2011-181. MVE has similarly engaged professional water consultants to address affected stockwater rights. MVE will continue to coordinate with the project area ranchers and their advisors to the extent they are willing to do so.	See the updated Grazing Coordination Plan (Appendix S in MVE [2023]) and EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics).
11978-126	Magic Valley Energy, LLC	28. Section 3.9.1.3 Table 3.9-8 MVE requests that Table 3.9-8 independently show how much the Project contributes to the cumulative unavailable acreages for livestock grazing (or a percentage of the acreage).	The percentages of affected project acreages are shown in Table 3.9-5, Affected Allotment Acreage during Operation and Final Reclamation.
11994-13	Danielle Gunn	Livestock permittees will need flexibility as we adjust to the changes in our grazing allotments. I am confident a balance can be achieved as agricultural practices combine with renewable energy options.	Coordination with livestock grazing permittees on grazing changes during the project are outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]).
12239-4	Lisa Bjerke	I am also concerned about impacts on the land and water currently used for cattle grazing. The negative effects of the project on this historical use cannot be overstated, and the livelihoods of many Idaho families will be put at risk as a result.	Chapter 3 analyzes impacts of the project to resources present in the analysis areas, including those associated with local and regional socioeconomics (Section 3.6), land use (Section 3.8), livestock grazing (Section 3.9), vegetation (Section 3.15), and water (Section 3.17).
12351-7	Julie Lynn	Wind energy will kill countless birds, harass grazing anim,als due the high noise of the turbines. In northern Europe, wind energy has cause:d reindeer to leave the areas permanently.	A review of physiological effects to livestock, using the best available science, is located in Section 3.9.2 (Physiological Effects to Livestock). Based on best available science, noise impacts would only occur within 50 feet of transformers.
12540-2	Karen Schumacher	43 USC 315b states holders of grazing permits “are entitled to participate in the use of the range”. With this project, those entitlements are being taken away, a violation of the law. With this project land will not be available for grazing, a clear violation of federal law 43 CFR § 4130.2(e)(1) The ongoing destruction of the land with temporary fencing that is then removed for fencing in another area causes a cumulative overall significant impact which violates 40 CFR 1508.27(b)(7). According to this law, breaking up these small areas does not diminish the significance of the cumulative damage. It also violates 40 CFR 1508.7 43 U.S. Code § 1701 requires that the land will be managed in a manner that will provide food and habitat for domestic animals. The destruction of this land violates this law. 43 CFR § 4130.2(e)(1) states that grazing permits that have been issued remain available for livestock grazing. This right to grazing is being removed by the project, another law violation. In the BLM Mitigation Handbook it states "wind energy projects shall be developed in a manner that will not prevent other land uses, including...livestock grazing..." This whole project violates the BLM's own Mitigation Handbook directives.	Livestock grazing will continue as outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]) and BLM guidelines following FLPMA. The BLM operates under a multiple use mandate through FLPMA, which states that resources and uses on public land must be used in a balanced combination that will best meet the needs of the people. This EIS analyzes the impacts of implementation of the project, which is an additional multiple use.
12685-2	Philip Gossi; Gooding-Lincoln County Farm Bureau	We wish to draw your attention to the complexities of livestock operations that will be impacted by the Lava Ridge Wind Project. It is hard to make an operation successful if part of the business cycle is removed. There are 42 producers that will be economically impacted. Please understand that the disruption of normal grazing activity, which includes eliminating or even temporally preventing use of BLM allotments, will have a direct negative effect. It is not an easy process to eliminate part or all of a herd and then start up again. Obviously this type of undertaking would affect many agricultural companies. For example: a decreased need for hay production would impact all supporting businesses such as seed, fertilizer and irrigation.	No permanent AUM permit reductions are included in the proposed alternatives as part of this project. The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources, if necessary. Livestock grazing permit changes are not evaluated as part of this project. Any permit authorizations or changes warranted by the EIS ROD will be completed through a separate permit action.
12685-7	Philip Gossi; Gooding-Lincoln County Farm Bureau	New roads - Increased public access will disturb wildlife and normal cattle grazing that currently co-exist. It also increases poaching and livestock theft. The new roads would encourage many outdoors activities that keep wildlife from habituating in this area. • Stray voltage - Research is not complete however, there is evidence of decreased milk production, with some cows discontinuing lactation all together. A decrease in cattle pregnancy rates has been reported. Stray voltage not only affects the allotment holders but neighboring private property as well. This can be referenced through studies from many states including Minnesota and Florida. • Predator control - Control of predators may be nonexistent because of a no-fly zone or the difficulty of flying through the proposed project. This may cause producers to lose livestock, due to predication.	See responses to comments 11226-3 (see in Table A-3o, Land Use and Realty, including Aviation) and 11481-3 (see in Table A-3o, Land Use and Realty, including Aviation). Impacts to wildlife and livestock grazing are analyzed in Sections 3.18 (Wildlife) and 3.9 (Livestock Grazing, including physiological effects to livestock), respectively.

Comment ID	Commenter	Public Comment	Response to Comment
12916-3	Gina Jerke	Grazing cattle will be stopped for the ranchers during construction – how will the BLM handle each ranchers' AUM's for the season(s) and will they be allowed to graze cattle elsewhere?	MVE has committed to providing alternative feed sources during construction and reclamation phases for AUMs that are unavailable, as noted in the Grazing Coordination Plan (Appendix S in MVE [2023]).
12982-9	Jerry Taylor	The DEIS gives little attention to potentially significant impacts from blasting, on the unique geology underlying the project area, the hydrological impacts that may occur, the loss of habitat(s), or the potential damage to irrigation structures and/or private wells. Instead, it relies on future mitigation and future plan development (i.e. a "Blasting Plan"), which would enlist the services of a "Blasting Engineer" to craft specific plans, after the final EIS record of decision is issued, on where and how to blast. Why wait? ...What about impacts on cow calf operations holding grazing privileges and permits in the area? What would it do in terms of stress on livestock, calving, breed back, grazing compliance with existing permits and grazing syst~ms? Would it change the grazing patterns and make some areas unusable? The EIS suggests that grazing has occurred harmoniously with other wind farms in operation. How long did it take to acclimate livestock to blasting or the noise of turbines and the motion associated with turning blades? I have inadvertently caused livestock to move by firing a shotgun, while bird hunting. I'm confident that cows will leave faster when a dynamite blast occurs (two times per day on average, as predicted in the DEIS).	Details of the Blasting Plan are site specific and therefore would be finalized after an alternative is selected and micro-siting is completed. Blasting and noise impacts to livestock are analyzed in Section 3.9.2 (Physiological Effects to Livestock). Also see response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources) regarding impacts to hydrology and irrigation structures.
12982-16	Jerry Taylor	The DEIS is not clear on grazing impacts. It talks about reductions (i.e. "Reductions in AUMs"). believe it refers to "temporary, long-term and permanent" reductions. What precisely does this mean and how would it be justified, by what authority, and how specifically would reductions be applied? This needs in depth analysis and disclosure upfront, it certainly would be a significant impact on those holding grazing privileges. Bear in mind that, while grazing is a privilege, a grazing permit holder in good standing has a right to have his or her grazing permit renewed. Grazing permits can be transferred and base property can be sold, but grazing privileges remain active and available except for "just cause11 (trespass, decline in grazing capacity, etc.) or if the privileges are dedicated to another public land use through a Land Use Planning process. {in accordance with the Taylor Grazing Act, FLPMA, and the Public Rangeland Improvement Act). What happens to grazing if and when MVE leaves?	No permanent AUM permit reductions are included in the proposed alternatives as part of this project. The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources. Livestock grazing permit changes are not evaluated as part of this project. If any permit authorizations or changes are warranted by the EIS ROD, they will be completed through a separate permit action.
13006-29	Leon Smith	2) IfNo Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with the grazing permittees to their satisfaction, including a compensation plan for loss of livestock from construction, operation, maintenance, and decommissioning, including but not limited to fencing, fire, and weed control.	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the grazing management plan during the project.
13009-2	Roy Prescott	MVE's Coordinated Grazing Plan (CGP) indicates that the range improvements will function better after the project is installed than they do now. PresCo supports the installation of "up to 24 miles of pipeline and as many as 35 trough sites" on the Star Lake Allotment and "15 new trough sites and approximately 27 miles of new pipeline" on the Sid Butte Allotment. These range improvements are needed on the allotments whether the project is built or not. The wind project provides a mechanism to get these range improvements built. Grazing distribution will improve with the new troughs. New troughs on Sid Butte will be combined with the new pastures to allow greatly improved range management and an opportunity to efficiently provide for an efficient deferred grazing rotation for the multiple permittees, both sheep and cattle.	Range improvements installed as part of the project are outlined in the Grazing Coordination Plan (Appendix S in MVE [2023]).
13009-3	Roy Prescott	The DEIS calls for reduction in sheep AUMs on Sid Butte and Star Lake allotments. However, review of the Grazing Coordination Plan and communication with MVE, indicate that there should be no reduction in sheep AUMs on either allotment. MVE has communicated that mitigation will be available to sheep permittees (including PresCo) but reductions will not be required. The tables in the DEIS and our communications with MVE indicate that there should be no reduction in sheep AUMs. The final EIS should reflect no reduction in sheep AUMs.	The analysis for grazing allotments (Section 3.9.1 [Grazing Allotments and Range Socioeconomics]) uses acreage disturbance to quantify the potential for loss of forage availability (using AUMs) for each alternative. No permanent AUM permit reductions are included in the proposed alternatives as part of this project. The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources. Livestock grazing permit changes are not evaluated as part of this project. If any permit authorizations or changes are warranted by the EIS ROD, they will be completed through a separate permit action.
13009-4	Roy Prescott	The DEIS calls for a phased construction schedule. MVE has made arrangements that will reduce stocking rates by just over a third during the construction period on the Star Lake allotment. Since less than one third of the allotment will be impacted by construction at any given time, there should be no reduction required of permittees who chose to stay on the allotment. MVE has made similar arrangements on the Sid Butte allotment. No reduction of AUMs should be required for any permittees that wish to graze during the construction period. MVE listened to the Sid Butte permittee requests for an improved grazing system. We fully support the establishment of a 14-pastures grazing rotation. We believe that these new pastures will prove to be successful and should be made permanent. The GCP calls for "temporary establishment of 15 pastures" to be constructed on the Sid Butte Allotment and temporary fences to be built on Star Lake and North Milner. The DEIS maps show these pastures to be the same as (or similar to) the pasture changes the Sid Butte permittees requested from BLM and have communicated to MVE . The new plan will include 14 pastures instead of the existing 4. These pastures should be permanent. If the fences are built for the construction and interim restoration periods, they should be left in place for the duration of the operation period. These additional pastures will improve grazing management on the Sid Butte allotment and better allow permittees to meet rangeland and habitat objectives. It appears short sighted to use these pastures for only 4 years after going through the trouble to design and build them for the construction period. The fences that make up these pastures will also provide better separation of livestock from improved roads. Any temporary fences on Star Lake and North Milner should be evaluated to determine if they should be in place for the duration of the operation period. MVE has worked with Sid Butte permittees to contract sufficient AUMs to be used as non-use for mitigation during construction and restoration. There should be no	See responses to comments 11204-18 (see in Table A-3p, Livestock Grazing) and 13009-3(see in Table A-3p, Livestock Grazing).

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		reason for permittees that do not want a reduction to have to take a reduction. All reduced AUMs should come from AUMs for which MVE has an agreement.	
13009-5	Roy Prescott	The DEIS calls for a rest rotation grazing plan for Star Lake and Sid Butte. A deferred rotation grazing plan would better allow grazing to meet habitat and rangeland objectives. This is particularly true if the deferred system reduces the amount of rangeland grazed during the critical growing season. A deferred system will better facilitate more grazing after the critical growing season (including the dormant season). Adding pastures and range improvements will facilitate the grazing plan and allow better distribution. The grazing season-of-use should be extended to allow additional dormant season grazing when conditions are right. The additional range improvements (fences, pipelines, and troughs) will improve control of grazing on the allotment and allow for better grazing distribution. These range improvements are critical to making the grazing system work with the addition of the wind turbines. If BLM grants the ROW, the range improvements should be included as a part of the plan.	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources and funding range improvements. Livestock grazing permit changes are not evaluated as part of this project. No permanent AUM permit reductions are included in the proposed alternatives as part of this project. No grazing permit authorizations or changes are being analyzed in this EIS. If any permit authorizations or changes are warranted by the EIS ROD, they will be completed through a separate permit action. See also responses to comments 11204-23 (see in Table A-3p, Livestock Grazing) and 11369-1 (see in Table A-3p, Livestock Grazing).
13009-6	Roy Prescott	The DEIS calls for a reduction of AUMs during construction, interim rehabilitation, and operation phases. The Star Lake permittees submitted documentation in 2009 to BLM that showed that Star Lake has more than enough forage to support restoration of suspended AUMs as well as an increase in stocking rates during favorable forage years. BLM should include this analysis when looking at the wind project. Once the new troughs and pasture fences are in place, currently unused forage will become available for livestock grazing. We think that this additional forage in combination with that demonstrated to be available in 2009 will indicate an increase in AUMs rather than the reduction called for in the DEIS. The 2009 data was only for Star Lake, but we believe the same to be true for Sid Butte. The improvements the CGP spells out for Sid Butte will improve distribution and access to currently unused forage to a level to support an increase in AUMs rather than a decrease	See response to comment 13009-5 (see in Table A-3p, Livestock Grazing).
13009-7	Roy Prescott	MVE has worked with Pres Co on the North Milner allotment. As the major AUM holder on that allotment, we believe that we can continue to work with MVE to offset any impacts. There should be no reduction in AUMs on North Milner during any phase. There are grazing management and range improvement options available to offset the impacts of the project without reducing AUMs. This si particularly true with Alternatives C or E where only 14 or 11 AUMs of forage would be impacted.	See response to comment 13009-5 (see in Table A-3p, Livestock Grazing).
3340-4	Sue Page	The LRWP will infringe upon the lives and livelihoods of many people that make a living from the land. The cattlemen will have to move their cattle from their BLM allotments during the construction of the project. These people have used this land for generations. Where will their herds be displaced to? Where will they acquire feed? Several farmers and dairymen will be surrounded by the wind turbines, essentially being imprisoned by the looming spires. How will the EMFs, turbine vibrations, and noise, impact their livestock?	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources. No permanent AUM permit reductions are included in the proposed alternatives as part of this project. Livestock grazing permit changes are not evaluated as part of this project. No grazing permit authorizations or changes are being analyzed in this EIS. If any permit authorizations or changes are warranted by the EIS ROD, they will be completed through a separate permit action. Section 3.9.2 (Physiological Effects to Livestock), including available published literature and analysis, discusses physiological effects to livestock.
3997-6	Angelee Eames	4.Post- construction reclamation will seed and allow cattle back on the land as stated in the EIS. How do you "mitigate" for cattlemen who will lose their allotments for two years of building? Where do those cattle go?	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources for phases where AUMs are unavailable due to the project.
5189-3	Traci Wood	It's said that the ones with grazing permits will be compensated. But is the compensation enough to make a difference, in the mean time how will they feed their cows, cost of hay is high as it is. And will they even be able to use the graze land again, or will it all be gated, controlled by the energy company?	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources for phases where AUMs are unavailable due to the project.
5331-4	Joan Hurlock	The LRWP will infringe upon the lives and livelihoods of many people that make a living from the land. The cattlemen will have to move their cattle from their BLM allotments during the construction of the project. These people have used this land for generations. Where will their herds be displaced to? Where will they acquire feed? Several farmers and dairymen will be surrounded by the wind turbines, essentially being imprisoned by the looming spires. How will the EMFs, turbine vibrations, and noise, impact their livestock? Their health?	See response to comment 3340-4 (see in Table A-3p, Livestock Grazing).
5896-14	Mike Tylka	Grazing. Local ranchers and businesses may be restricted from using legitimate grazing leases if this project moves forward costing them thousands of dollars with no compensation.	See response to comment 13009-5 (see in Table A-3p, Livestock Grazing).
6387-14	AJ Whitecotton	Local ranchers and businesses may be restricted from using legitimate grazing leases if this project moves forward costing them thousands of dollars with no compensation.	See response to comment 13009-5 (see in Table A-3p, Livestock Grazing).
7320-2	Lora Ohlensehlen	It is proposed that some ranchers will have grazing at another site temporarily. That was creative problem solving. However they should not lose any AUMs. Losing AUM's is totally unacceptable. The ranchers rights should be grandfathered in because they were there first. They should lose no AUMs. I understand that the proposed windmills will take up land space, but give or open up other BLM ground for the ranchers to graze on. They should not suffer consequences created by outsiders.	See responses to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 13009-5 (see in Table A-3p, Livestock Grazing). The BLM operates under a multiple use mandate through FLPMA, which states that resources and uses on public land must be used in a balanced combination that will best meet the needs of the people. This EIS analyzes the impacts of implementation of the project, which is an additional multiple use.
7321-3	Travis Wells	Grazing is also an important part of public land use. Construction of the turbines will limit the grazing that can occur because the area will be roped off and not accessible. Even after construction is complete, maintenance will also limit the area that can be grazed. Some cattle may also be frightened by the massive structures and then run away from them. This would break border fences and cost ranchers money.	See response to comment 3340-4 (see in Table A-3p, Livestock Grazing).
8642-4	Carl Montgomery	The amount of land available to graze will be drastically reduced by the Lava Ridge Wind Project, especially during construction. The amount of fencing Magic Valley Energy (the company responsible for the project) is	See response to comment 13009-5 (see in Table A-3p, Livestock Grazing).

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		proposing to build will disrupt the grazing management and increase the cost and be a burden to the cattle producers. Other feed resources will have to be found, but as mentioned earlier this area is a desert that has been in a drought. Finding those resources will be costly, if not impossible. And as history has proven, once cattle have been removed from public lands they are not always allowed back due to various interest groups, and if they are it is almost always under altered circumstances. Cattle area tool to help manage the public lands and meet this mission of the BLM.	
8643-5	Steve Woods; Pam Woods	The impact of these turbines on cattle and wildlife is a yet to be proven issue. Even with smaller turbines, there has been possible high frequency and stray current adverse impact on cattle and wildlife. To embark on such a huge project over such a huge area with little or no time-proven results is irresponsible.	See responses to comments 11204-20 (see in Table A-3p, Livestock Grazing) and 11535-165 (see in Table A-3p, Livestock Grazing).
8790-2	James Ritchie	2. We have a grazing permit in the Star Lake allotment and believe that construction of this project will impact the aum's available, up to 1/3 or more based on a 3 phase construction period. Where will we find replacement feed and who will pay for it? The draft EIS doesn't address the economic impact to local families having their business devastated by this project.	The Grazing Coordination Plan (Appendix S in MVE [2023]) outlines the proposed plan for livestock grazing management during the project phases, including MVE committing to providing alternative feed sources and funding range improvements. Socioeconomic impacts, including those to the livestock grazing economy, are analyzed in Section 3.9.1 (Grazing Allotments and Range Socioeconomics).
9387-1	Jordan Beadz	The effect on cattle grazing also wildlife impact would be highly bad for all agriculture	Impacts to Livestock Grazing are analyzed in Section 3.9 and wildlife impacts are analyzed in Section 3.18 (Wildlife).
F2-3		Livestock grazing is not just a large economic factor in this area but also a cultural factor as well. Limiting grazing in response to the approval of this wind farm through reductions in AUM's and other ways changes the traditional uses of this land. This is a way of life for the multiple generations of farmers and ranchers in this area.	Section 3.9.1 (Grazing Allotments and Range Socioeconomics) describes the potential impacts to economic and cultural values. See also response to 11204-13 (see in Table A-3p, Livestock Grazing).

Minidoka War Relocation Center and Minidoka National Historic Site

In addition to the Minidoka War Relocation Center and Minidoka National Historic Site comments and the BLM's responses to these in Table A-3q below, please refer to Table A-1, Recurring Themes and Responses for Comments Opposing the Project Because of Minidoka War Relocation Center and Minidoka National Historic Site.

Table A-3q. Minidoka War Relocation Center and Minidoka National Historic Site

Comment ID	Commenter	Public Comment	Response to Comment
1052-1	Lawrence Matsuda	My name is Lawrence Matsuda and I was born in the Minidoka Idaho Concentration Camp-Block 26 Barrack 2. My mother, father, brother, grandfathers, grandmothers, uncles, aunts, and cousins were there for three years. My position is that: I support the NO windmill option (Option One) because there l s no feasible way to mitigate the impact of the project as well as the fact that this project functions as a 21ST century version of identity hijacking and identity theft. Being born in the Minidoka Concentration camp, I understand that there are two Americas and one has less justice by design. As a person from the lesser America I've witnessed or am familiar with freeways that destroyed African American areas in New Orleans, destruction of Black Wall Street, stadiums, freeways, and light rails scaring Seattle's Chinatown/Japantown, effects of the forced incarceration on the Japanese, California Chinese gold miner claim jumping, Native American reservations and much more. The historic pattern is clear. The lives and property of lesser Americans are to be exploited. Today faceless corporations understand the game and use bureaucratic rules/processes, lawyers, legalistic language to put forth projects that promise progress and high sounding ideals at the expense of the "other" America. Ironically, using their corporate business model to assess the Lava Ridge windmill project, my conclusion is that there is no upside for lesser Americans. It only brings grief and continued exploitation. So the question is, "What is in it for us?" The response is, "There is nothing good in it for us." The issue is similar to an identity theft scam where an anti-virus warning threat pops up on your computer screen and they tell you to click this link within four minutes or your bank account would be in jeopardy. The answer is the same for the Lava Ridge project. Just hit "DELETE". The Lava Ridge proposal is nothing more than a brazen attempt of bait and switch to steal Minidoka's identity. Through esoteric legalistic maneuvers Minidoka could be surrounded by windmills and become nothing more than a soulless power station of 400 feet tall windmills. The Minidoka historic site would be lost in the shadows of Lava Ridge turning blades of profit. Lost would be a reminder to America that the forced incarceration should never happen again and lost would be the sacred nature of a land that held 10,000 souls, where 400 were buried and hundreds born. Lost would be another tenuous fragment of lesser America that speaks to "liberty and justice for all."	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. The BLM is considering a No Action alternative for the project, by which it compares the potential impacts of the action alternative analyses in the EIS. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. At no point would Minidoka NHS be within the literal shadows or shadow flicker zone of wind turbine generators from the project; see EIS Section 3.16 (Visual Resources). Alternatives considered in the EIS, including the BLM Preferred Alternative, would include these setbacks. Action alternatives considered beyond MVE's Proposed Action would all work to further set back turbines from the Minidoka NHS area. Under no alternative would turbines surround Minidoka NHS. Although lessened, visual impacts would remain under any action alternative, including—as presented in the EIS—those that could affect the experience and sense of place; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). However, impacts would be mitigated, as stated in EIS Section 3.5; although this mitigation would not remove the impacts that remain after all measures to avoid and minimize impacts are applied. Mitigation efforts for the remaining impacts are meant to retain and preserve resource values in alternate forms or to return value through other means, such as retaining documentation of the impacted resource for future knowledge and interpreting and educating on historic properties and area history such as at Minidoka. One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and enhance awareness of its history and the history of the Japanese American community. Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice are addressed in EIS Section 3.6.1. The BLM's environmental justice analysis complies with EO 12898 and the BLM's environmental justice guidance document (IM 2022-059) (see response to comment 11535-49), and response to comment 11535-50 (see both in Table A-3h, Environmental Justice and Socioeconomics) relating to meaningful engagement with environmental justice communities. The final EIS includes new Section 3.19 (Minidoka National Historic Site Interpretive Purpose), where impacts identified within EIS Sections 3.5, 3.6, and 3.16 are assessed in terms of how these would impact the interpretive purpose of Minidoka NHS under the supporting concepts (Civil and Constitutional Rights, People, Place, and WWII), through the four interpretive themes established through Public Law 110-229:

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		As a result, I urge that the Minidoka site have NO windmills nearby. Corporate America already has non Minidoka alternatives that may cost a little more but would still turn a profit. To them the loss of the site would be a survivable write-off. But to those of us in the other America, no windmills means that Japanese Americans who sacrificed their lives in WWII did not die in vain and that the intergenerational after effects of the forced incarceration are more tolerable knowing that Minidoka is intact. Minidoka would then be able to maintain its identity as a shining beacon for justice. As a committee person, a vote against windmills means you can tell your children and grandchildren that you did something courageous that narrowed the equity gap between the two Americas in 2023. By voting "No" you prevented an identity theft that would have turned Minidoka into a shadow of Lava Ridge. Also you would have stopped a project that exploits "other" Americans as they have been countless times in the past.	• the story of the relocation of Japanese Americans during WWII to the Minidoka WRC and other centers across the United States; • the living conditions of the relocation centers; • the work performed by those incarcerated at the relocation centers; and • the contributions of the United States military made by Japanese Americans who had been incarcerated. In a ROD, following the final EIS, the BLM will decide to approve, approve with modification, or disapprove the project as proposed.
11297-6	Steven Upton, Linda Upton	What will this project do to the Minidoka National Monument?	Potential impacts that could result in an adverse effect to Minidoka NHS and the Minidoka WRC are addressed in the draft EIS Section 3.5 (Cultural Resources). Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
11305-1	Marleen Wallingford	My family was removed from their house in Portland in May 1942 and taken away from the city by train to parts unknown. It turned out to be a community,which was not even completed yet, was Minidoka which is Shoshone for broad expanse. This was to be there home for the next three years. I consider this a site of conscience. This is a physical reminder of what our country did when people let fear and prejudice guide their decisions rather than the rule of law. Our civil rights were grossly violated and we must never forget that our government policies ruined people's lives and cost millions of dollars because of racism. I am sympathetic to our need to find sustainable alternatives for our energy use but building these huge wind structures would forever ruin the experience of being at this sacred place to the Japanese American Community. I implore you to find alternative sites which does not compromise the ambience of the Minidoka National Historic Site. This is where my family was detained without any trial or judicial review. I have attended one of the Pilgrimage which had been held on a regular basis (until COVID) and I could feel the echos of my family in that space. I would consider how this project changes the environment similar to what we might object to if this wind farm was built adjoining one of our national parks like the Grand Canyon. These are sacred places that need to be preserved for ourselves and the larger world community.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. The BLM recognizes Minidoka NHS is a site of conscience, moral reflection, and community healing. This topic is addressed in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) of the draft EIS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11306-1	Elaine Aoki, Emily Aoki Yamashita	April 16, 2023 Dear Kasey Prestwich and Shoshone Bureau of Land Management Members, We are writing to share our disappointment and objection to the Lava Ridge Draft Environmental Impact Statement (DEIS). While we support the need for renewable energy infrastructure, we oppose the identification of the Minidoka National Historical Site (the adjacent area as well as the partial area of the original site) as the location for this development. The DEIS fails to recognize the history and significance of the Minidoka NHS as a place of healing for the Japanese American Nikkei families who were unconstitutionally incarcerated as a result of Executive Order 9066. The Minidoka NHS not only represents a cultural landscape, but it also serves as a reminder and educational opportunity for future generations that acting on fear, xenophobia, and racism is never acceptable. By inappropriately identifying the Minidoka NHS as a place for "Tourists and Recreationalists," the Lava Ridge DEIS is undermining the generational trauma that has rippled through the Japanese American community because of the incarceration that took place on this land, and we urge the Shoshone BLM to reconsider using this significant site of history as the location for the windmill project. Our family represents five generations of Japanese Americans who have been personally impacted by the incarceration that took place at the Minidoka NHS. Due to the deep significance that this event has had on all of our lives, we have made continuous efforts to organize family pilgrimages to the Minidoka NHS to honor our elders who were forced into incarceration. Later generations of our family have been able to walk the landscape and hear stories of how their elders persevered through this act of injustice. By personally exploring the landscape, we were able to have an immersive understanding of the desolate location, inhumane living conditions, and destruction of family that our families were forced into. Even more significant, this visceral experience resonated emotionally within all of us, as we could feel our elder's confusion, rage, and suffering. After experiencing a year in Minidoka as an 18-year-old youth, our Nisei father enlisted and was placed with the US Army's Military Intelligence Service. This experience has influenced future generations as we have each taken action to leading and teaching others that equity and civil rights are not taken for granted. Family members continue to be K-12/Higher Education educators, writers, textbook writers, and painters to share the experiences of lives were effected by Minidoka. Even our younger members were influenced by Minidoka and became Annapolis graduates and Navy officers while another pursues graduate degrees and a professional work world in race, equity, and community diaspora. Therefore, we petition the Bureau of Land Management not to develop the Lava Ridge Wind Project on original and adjacent lands to the Minidoka NHS, as it represents past mistakes and future lessons for America as a whole. Those impacted by the wrongful incarceration deserve to have a protected space of cultural significance to honor and respectfully anchor their histories. Their stories need to be shared and remembered. We urge the BLM to consider the intergenerational trauma that occurred from the WWII Japanese American incarceration and understand the significance of the Minidoka NHS as reminder that equity and civil rights are not taken for granted in this country. We have not been convinced that this project can only occur on this site, nor have we been given justification that this project must be built on a historically significant area to the Japanese American community. Sincerely, Elaine M. Aoki, 3rd generation Minidoka family member Emily Aoki Yamashita, 4th generation Minidoka family member	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) acknowledges the historical significance of Minidoka NHS. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. The EIS describes concerns that, in addition to visual impact, extend to the emotional impact the appearance of the project on the landscape could have on the Japanese American communities' experience of the Minidoka WRC and Minidoka NHS. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. The BLM is considering a No Action alternative for the project. The potential impacts of all action alternatives are addressed in the EIS. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. In response to public comments on the draft EIS, the BLM identified the Preferred Alternative, described in the final EIS, which would further reduce project impacts to Minidoka NHS and the Minidoka WRC. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Varying degrees of impacts to Minidoka NHS would result under any of the action alternatives, and various mitigation measures would be applied, as stated in the EIS. The avoidance, minimization, and mitigation of impacts described in the EIS would support the preservation of Minidoka NHS. One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and enhance awareness of its history and the history of the Japanese American community.

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11315-5	Karen Atkinson	Comments are submitted via attached pdf document. [attachment] Dear Mr Prestwich: I'm an Alaska Native who had family removed from Alaska under Executive Order 9066 and sent to the Minidoka Relocation Center in Idaho. My great-uncle was Tsimshian and Japanese and lived in Ketchikan, Alaska. My great-uncle and his young family were removed from Alaska in 1942. My great-uncle was separated from his family and sent to the Minidoka Relocation Center. He was among the 45 Alaskans of both Alaska Native and Japanese ancestry who were incarcerated at Minidoka. My great-grandfather immigrated from Japan and made his home in Ketchikan, Alaska where he married a Tsimshian woman and owned a restaurant and commercial fishing boat. Immediately after the attack on Pearl Harbor, the U.S. Government wrongfully arrested my great-grandfather along with all of Alaska's first generation Japanese men and sent them to prisons in Lordsburg and Santa Fe, New Mexico. Most were fathers and grandfathers who were removed from Alaska and separated from their families. My great grandfather was separated from his family for the duration of the war. On behalf of my family, I am submitting this comment on the Lava Ridge Draft Environmental Impact Statement (DEIS) in support of Alternative A-the No Action Alternative due to the impacts the proposed large-scale industrial project would have on the Minidoka Relocation Center as a place of healing and commemoration for Alaska Natives to honor their family members who were wrongly incarcerated there. The indirect and direct effects of the Project on the historic footprint of the Minidoka Relocation Center and the Minidoka National Historic Site (MNHS) would be pervasive, destructive, and permanent. Because of their nature and scope, the effects cannot be adequately mitigated at the proposed site. Significance of Minidoka to Alaska Natives In 1942, the U.S. forcibly removed 145 Japanese Americans from their homes and communities in Alaska, most were from Southeast Alaska. These Alaskans were primarily women and children whose fathers and husbands were arrested and detained soon after Japan's attack on Pearl Harbor. About a third of the Alaskans removed under EO 9066 were of both Alaska Native and Japanese ancestry including Tlingit, Haida, Tsimshian, Aleut, Inupiat, and others. Most were children from marriages between Japanese men and Alaska Native women who lived in tight-knit communities. They came from unique backgrounds some were from Alaska Native villages in northern and western Alaska, some hunted and fished for a living, and others were well-established business owners from Southeast like my family. Most of the Alaskan Japanese families, including those of Alaska Native and Japanese descent, were incarcerated at the Minidoka Relocation Center thousands of miles from home, purposely located in a desolate and isolated area of Idaho. The forced removal had devastating impacts particularly on these Alaska Native families and created unthinkable hardships. In many cases families, like mine, were separated for the duration of the war. Some Alaska Native children were separated from their parents and went to Minidoka by themselves. Some Alaska Native wives went to Minidoka with her children to keep their family together. At Minidoka, Alaskan Japanese were purposely isolated from the outside world. For years, they lived in harsh, overcrowded conditions, surrounded by barbed wire fences and armed guards. Those of both Alaska Native and Japanese ancestry were even more isolated within the camp because they were torn from their Native communities and culture and lived in a desolate desert environment with people of an unfamiliar culture. Assigned to their own barracks block, they formed their own unique community at the center of the Minidoka camp to provide strength and support to one another. Significant Impacts on Alaska Natives Not Addressed Minidoka National Historic Site is of historic and spiritual significance to Alaska Natives because of the forced removal of the 45 Alaskans of both Alaska Native and Japanese ancestry that were incarcerated there. Executive Order 13175 Consultation and Coordination with Indian Tribal Governments (2000) and other federal laws and policies expressly require BLM to consult with Tribes and Alaska Natives early in the agency process to identify sites of historic, cultural, and sacred nature and to consider them in the agency decision-making processes. The DEIS does not describe or assess the impact of the project on Alaska Natives associated with Minidoka as required by federal law and policies. The DEIS only talks about the Japanese American community broadly. It fails to mention Alaska Natives and their descendants who would be impacted by the proposed wind project. Historic and Cultural Significance: The Minidoka National Historic Site tells the stories of the forced incarceration of Japanese Americans and Alaska Natives and ensures their stories are honored and preserved for future generations. Minidoka has significant historic, spiritual, and cultural associations with Alaska Natives. It is integral to the identity of the 45 Alaska Natives and their descendants who were removed from their homes, separated from their families, and detained in a purposely isolated environment thousands of miles from home. Minidoka is a focal point for cultural and religious practices as a sacred place for commemoration and healing. An unobstructed view of the sweeping vistas and desolate environment is essential to the immersive experience and practice of commemorating those that were incarcerated there. The unobstructed landscape and vistas associated with the Minidoka Relocation Center and its historic footprint are integral to the cultural practices associated with the healing and commemorative activities that occur at the site. Survivors and their relatives can make pilgrimages to heal the deep emotional trauma. The site is an acknowledgement of the injustice that happened here and the tragic consequences it had on so many Alaska Native families like mine. Environmental Setting: Because of its immersive setting and the sense of remoteness and isolation provided by the sweeping vistas of distant mountains, people who visit can experience what life must have been like for the Alaska Natives at Minidoka. The proposed Lava Ridge large-scale industrial project and its 400 wind turbines would tower over and encroach on the scenic vistas and destroy the ability to experience what it was like to be incarcerated at Minidoka and that feeling of being alone and secluded that my great-uncle experienced there. The unobstructed landscape and vistas associated with the Minidoka Relocation Center and its historic footprint are integral to the practices associated with the healing and commemorative activities that occur at the site. DEIS Alternatives I support Alternative A-No Action Alternative because it is the only alternative that protects the integrity of the fundamental resource values associated with the Minidoka National Historic Site and its historic footprint. This includes the site's environmental setting, historic and cultural values, and scenic resources and viewshed, including its immersive setting which allows camp survivors and	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. The BLM's scoping and consultation efforts are summarized in EIS Appendix 10, under Consultation and Coordination, and in the scoping report prepared for the project and posted on the BLM's project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/510). The DOI Office of Collaborative Action and Dispute Resolution further conducted outreach efforts to the Japanese American communities in Idaho and throughout the United States with connections to Minidoka NHS to identify and consult on community interests and concerns and receive input on the project and produced a summary report on these efforts, as cited in the EIS, and also available on the BLM's project website. The BLM understands that Alaska Natives, including Alaska Native spouses and mixed Alaska Native and Nikkei children, were among the Nikkei population incarcerated at the Minidoka WRC. The NHPA Section 106 consulting parties representing the Minidoka-connected community include those with direct ties to Alaska, such as the Alaska Chapter of the JACL, and those from Alaska territory. The BLM is consulting with Native American Tribes with ancestral ties to the project area (see EIS Appendix 10, Section 106 Consultation and Government-to-Government Tribal Consultation). Alaska Native Tribes were not directly among interested parties or stakeholders identified during initial project scoping or through the NHPA Section 106 consultation process. Also see response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding the DOI's trust responsibilities, specific treaties that relate to federally recognized Tribes with ancestral ties to the project area, and the EIS's full consideration of impacts to resources that may be associated with tribal rights or interests. The description of Minidoka NHS and the Minidoka WRC included in EIS Sections 3.5 (Cultural Resources) and 3.6 (Environmental Justice and Socioeconomics) has been revised to properly reflect the different types of communities that were incarcerated at the site. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. At no place would wind turbine generators from the project literally tower over any part of Minidoka NHS. In response to public comments on the draft EIS, the BLM identified the Preferred Alternative, described in the final EIS, which would further reduce project impacts to Minidoka NHS and its setting within the greater Minidoka WRC. Regarding mitigation measures and associated consultation related to cultural resources, including Minidoka NHS, please see response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns). EIS Section 3.6 additionally considers mitigation measures related to adverse environmental justice community impacts. As noted in response to comment 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns): The current EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking to protect the historic properties associated with Minidoka NHS. The BLM is meeting all program and resource management planning requirements under the NHPA; NEPA; FLPMA; and other laws, regulations, and federal requirements; in advance of the project decision. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA, completing the Section 106 process in consultation with consulting parties. No physical impacts from the project would result at Minidoka NHS. Varying degrees of non-physical impacts to Minidoka NHS would result under any of the action alternatives, and various mitigation measures would be applied, as stated in the EIS. The No Action alternative also remains an option. Regarding ACECs, please see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		descendants to better understand and connect to the lives of the people incarcerated at Minidoka and the hardships they endured. Additionally, I support the Greater Minidoka Area of Critical Environmental Concern (ACEC) to protect Minidoka's viewshed along with grazing, recreational access, migration corridors, raptors, Monarch butterflies, general aviation, and cultural sites and other values. The BLM's preferred project alternatives will have significant adverse effects on the the cultural practices of healing and commemoration associated with the Minidoka National Historic Site and its historic footprint. The impacts of large industrial scale turbines are permanent and can not be satisfactorily mitigated. The project will affect the viewshed and cultural landscape associated with the Minidoka National Historic Site. The project turbines will introduce a high concentration of large-scale industrial visual elements that are out of character with the Site's immersive setting that inextricably contributes to its historic and cultural significance. The altered viewshed would interfere with the healing and commemorative activities of Alaska Natives that occur at the Minidoka National Historic Site to honor their relatives who were incarcerated there. The proposed project is inconsistent with the MNHS enabling legislation, NEPA, and historic preservation laws. The Lava Ridge project would degrade and destroy the sense of isolation and desolation that my great-uncle experienced there. It demeans the memory and hardship that my uncle and the other Alaska Natives experienced at Minidoka. Their incarceration is a reminder of the tragic human consequences of government policies driven by systemic racism and hatred. Preserving the Minidoka Historical Site is a way to honor the Alaska Natives who were irreparably harmed as a result of government policies. The DEIS does not address the potential impacts the project would have on Alaska Natives ,,, historic and cultural associations and with the Minidoka Historic Site and its historic footprint and does not adequately provide for mitigation for impacts on Alaska Natives. Before finalizing the DEIS, BLM should consult with Alaska Native tribes and organizations regarding the impacts the Lava Ridge project would have on Alaska Native connections to the historic, religious, and cultural resources of the Minidoka War Relocation Center and Historic Site and its significance to Alaska Natives. Sincerely, Karen Atkinson Albuquerque, New Mexico cc: Honorable Deb Haaland Solicitor Robert Anderson Honorable Martin Heinrich Honorable Ben Ray Lujan Honorable Melanie Stansbury Advisory Council on Historic Preservation New Mexico Chapter-Japanese American Citizens League Alaska Chapter-Japanese American Citizens League	
11323-1	Mary Lou Sumioka	Minadoka is a memorial to Japanese-American incarceration. It deserves to a prominent, unsullied place in our landscape and history. Allowing a private company to develp the Lava Ridge Wind Project so close to the memorial would relegate it to an insignificant neighbor. Minadoka should be listed on the National Register of Historical Places because it is an historical place. It need to be protected for those of us who are intimately connected to those who were interned there, as well as for the general public who may be unaware of how American citizens of Japanese descent were summarliy rounded up in 'camps' such as Minadoka. Irony...so much irony. While my future mother-in-law and her family lived in horse stalls at Minadoka with sand whipping through cracks in the walls, my future father-in-law fought in the 442nd Regimental Combat Team, an all-Japanese unit in World War II. Not surprisingly, they were the most decorated unit of its size and length of service because they were sent on the dangerous missions, such as rescuing the 'Lost Battalion'. The Nisei (second generation) soldiers suffered heavy casualties...more than 800, to rescue a Texas National Guard team made up of approximately 275 white American soldiers. My father-in-law, a sergeant in the 442nd, wasn't involved in the rescue because he had already suffered a serious knee injury in Arno, Italy. Many years later, I wrote a letter to the editor of the Tacoma News Tribune protesting a comment published by another letter writer. The Puyallup Assembly Center (known by the name of 'Camp Harmony'...more irony) for Japanese-Americans before transport to the camp. Years later, the Puyallup Fair wanted to place a plalque inside the fairgrounds to commemorate that piece of history. A woman wrote to the paper complaining that if there was a plaque at all, it should be placed in the parking lot because, after all, Japanese-Americans were put in the camps 'for their own good'. I wrote a letter forcefully explaining why the plaque deserved a prominent place inside the grounds In those days, as a letter writer, I was required to include not only my name, but my address. Shortly afterward, I received a note on a News Tribune notepad railing the 'you and your kind always want something for nothing' (more irony). I'm caucasion with too white skin and very blue eyes. One final irony. My husband's aunt, also incarcerated at Minadoka, where armed guards manned the guard towers, made a scrapbook. She gathered up news and mementos of camp life. To me, it's heartbreaking. While locked up, the internees recreated American life: baseball games, school, proms, Scout troops... My mother-in-law taught in the high school, even thought she was only a few years older than her students. After graduating for the University of Washington, she talked her advisor because she wanted to become a teacher. He told her in no uncertain terms she would never be hired. She went on to earn her Master's in social workd and became nothing short of a legend at Seattle Childrens' Home Society and Ryther Child Care Center. My mother- and father-in-law are American heroes. They deserve a fitting memorial to commemorate their significant contributions to this country while at the same time suffering illegal incarceration, not to mention continuing racism.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing, and the EIS's address of impacts to the natural and cultural landscape surrounding Minidoka NHS. As noted in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), Minidoka NHS is a nationally significant site listed on the NRHP under Criterion A (historic event). See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS.
11325-1	Louise Walsh	To Whom It May Concern, Regarding the Lava Ridge wind turbines. I was heartbroken to hear of this plan. Many of my neighbors and friends were interned at the Minidoka site during WWII. Our family cared for our neighbors farm so they would have something to return to, they are family to us, and we still keep in contact with their descendents. It would be a shame to desecrate the site. I have visited the site, and hope to visit many more times. It is a solemn place of reflection and rememberance. We as a society should never forget our shameful history. Under certain conditions the wind turbines can be heard for miles, this will greatly impact the Minidoka National Historic Site, and hinder the visitors oportunity to experience the site. And the site of wind turbines will negatively impact the view shed. Once the turbines are installed you will never be able to turn back, I think it is important to experience the isolation and views that are citizens of Japanese descent experienced. We are not	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing, and the EIS's address of impacts to the natural and cultural landscape surrounding Minidoka NHS. Analyses, as in Section 3.5 (Cultural Resources), have determined that while wind noise from operating turbines would be audible at Minidoka NHS under Alternative B, no perceptible turbine wind noise from the project would occur at Minidoka NHS under Alternatives C, D, or E. Also see response to comment 11315-5 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site), in general, and response to

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		just tourists, we come to remember our past and our friends who have since passed. Please do not allow the Lava Ridge wind turbines to be installed. Sincerely, Louise Walsh 4621 154th Ave. Ct. East Sumner, WA 98390	comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns), regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. The BLM is considering a No Action alternative for the project in addition to the action alternative analyses in the EIS.
11337-1	Dave Shigaki	To: Shoshone BLM US Representative: Pramila Jayapal City/State of Residence: Seattle, WA I am a 4th generation Japanese-American living in Seattle, Washington. My parents, grandparents, and great-grandparents all were incarcerated during World War II in relocation camps - first in Camp Harmony in Puyallup, Washington, and then subsequently moved to Minidoka, Idaho. The camp location in Minidoka is significant; it was once believed that by moving people of japanese ancestry further inland, the risk of them contacting the nation of Japan would be diminished. The very thought of this is appalling and shameful. My parents, grandparents, and great-grandparents all suffered immeasurably during this time; traveling only with those belongings that they were able to carry, my family members made the best of a terrible situation where they were unjustly persecuted based solely on their appearance. Thankfully, all incarcerated family members were able to persevere through resilience and grit. I am writing this letter to request that the land where the former camp in Minidoka be preserved as a national historic site and to avoid an impairment of resources. It goes without saying that even today, in 2023, we continue to see racially motivated attacks and provocations. Our nation has become polarized; it is unfathomable that racially motivated harassment and attacks have become normalized. Even with the recent COVID pandemic and the associated violence against Asian Amercians, we as a nation continue to face racial challenges. That is why it is critically important to preserve monuments such as Minidoka as an International Site of Conscience, and continue to provide education and visibility on the unconstitutional removal of so many Japanese Americans from their homes and uprooting their lives. The proposal by the DEIS to use land surrounding Minidoka for wind farms shows a total lack of respect for this significant landmark. The DEIS inappropriately identifies Minidoka NHS as for "Tourists and Recreationalists" which reflects ignorance of the history of the location and its impacts. The DEIS also fails to recognize the importance of the cultural landscape and preserve the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience. I urge you to reconsider the Lava Ridge development and preserve the camp in Minidoka, Idaho, and its surrounding area, as it represents a critical piece of US history that should not be forgotten.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. As noted in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), Minidoka NHS is a nationally significant site listed on the NRHP under Criterion A (historic event). See response to comment 11315-5 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives.
11379-1	Kenichi Yabusaki	My Name is Kenichi Yabusaki. My parents, sister, and maternal grandparents were incarcerated in Camp Minidoka (Camp) for nearly three years (1942-45). My mother was carrying a fetus during the mass evacuation and lost her daughter in Camp a few days after her birth. I was born a prisoner of War in Minidoka in September 1944. Lava Ridge is a sacred ground inhabited by indigenous peoples thousands of years before White settlement. Anyone visiting the Minidoka and the land surrounding it is a guest. Building a wind farm on this land desecrates it and detracts from what Minidoka represents. Minidoka is only one of more than ten other major concentration camps that, in total, imprisoned nearly 120,000 innocent victims without due process. All those imprisoned are a testament to the human spirit. Minidoka is hallowed ground. My baby sister's ashes are part of Minidoka. To have towering wind turbines humming on Lava Ridge would bring bad karma, deprecate a historical site, and send a message that it should never be forgotten, as every Camp represents what the evil in politics in a democracy can do. I am against the construction of wind farms on Lava Ridge. Thank you for your consideration. Sincerely, Kenichi Yabusaki In memory of Shigeo, Toshiko, Naomi, Hisakichi, and Umeyo	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. The BLM recognizes that the Lava Ridge area, within which the project is proposed, contains places and landscapes that are spiritually and culturally significant to Native American Tribes. This topic is addressed in EIS Section 3.5.1 (Native American Resources). The BLM also understands the Japanese American and Minidoka-connected communities consider Minidoka NHS and the Minidoka WRC sacred and important historic places where learning and healing can be achieved through their continued preservation. This is discussed in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site). See response to comment 11337-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Also see response to comment 11325-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding analysis of turbine noise from the project occurring at Minidoka NHS. Please note that no wind turbine generators would be placed at Minidoka NHS under any action alternative.
11382-1	Paul Fujihara	My parents and relatives were incarcerated during World War 2 within these so called 'Relocation Camps'. They were forced to live in these crude concentration camps, behind barbed wire and patrolled by armed sentrys. They endured the dusty hot conditions of Summer, the freezing wintry weather of winter, with food supplies that were poor. communal showers and open toilets. They lost their homes, belongings, businesses and years of their lives. They felt alien, untrusted and un-American. They lost their pride and their sense of purpose. Now the impacts of their history will be swept under the rug with the changing times. I have been fortunate to have visited the Minidoka site, I felt moved by its sense of desolation, loneliness and absolute emptiness. Visitors to the site will not feel the same impact of visual and auditory loneliness. The feeling of despair and loss. We are not learning from our history. This important lesson needs to be shared in its entirety. Other races are being challenged now. I have watched the computer simulations and find them deceiving. I am quite familiar with cad animations and realize how they can be used to alter our perception of reality. By using a 'fisheye lens', we can minimize the visual impacts of the 'wind farm'. In actuality visitors will be able to see the tall towers and also hear the constant whoosh whoosh of the blades through the wind. I respectfully ask for NO ACTION be taken on the lava ridge project	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11337-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Please also see response to comment 11325-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding analysis of turbine noise from the project occurring at Minidoka NHS. Please note that BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS. As noted in response to comment 11454-2 (see in Table A-3y, Visual Resources), dynamic simulations of wind turbine generators were provided for informational purposes, and these may vary in viewing accuracy depending on the resolution of the computer and monitor settings that the individual viewer may be using. The visual impacts for the project did not rely on the dynamic simulations but rather were further supported by the single-frame simulations contained in EIS Appendix 5 (Select Visual Resource Simulations) in the EIS and Appendix C in the visual resource technical report (SWCA 2024). Visual simulations have been developed as a tool to capture the impact of the project at a specific moment in time. Visual simulations for the project were developed using the methodology described in the project visual resources technical report in Section 5.2 (Visual Simulations and Contrast Rating Analysis) (SWCA 2024). Due to the high sensitivity of the landscape to change, individuals viewing the simulations may perceive them as understating the actual in-person impacts. Simulations are representative of single-frame 50-millimeter images. Panoramic images were created though stitching multiple single frame images together and no fisheye lens was used to create simulations. Dynamic simulations are representative of locations and operation frequency and video format used lacks the resolution to accurately simulate brightness and visibility over distance; therefore,

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			these depictions are illustrative only. Also see response to comment 11458-5 (see in Table A-3y, Visual Resources).
11383-1	Chris Weir	My comments regarding the proposed Lava Ridge project are presented below: The project diminishes the experience at Minidoka NHS by causing irreparable harm to the Japanese American community and descendants of Minidoka incarcerees. It is an impediment to future Japanese American generations by causing noise pollution and visual impairment of the viewshed that their ancestors would have once seen. The Minidoka NHS is an immersive educational experience where reflection and healing of past historical events take place. This project would alter the experience of visiting the Minidoka NHS and make it difficult to fully immerse oneself with the environment. The BLM should analyze how this project would impact future generations of Japanese Americans ability and accessibility to learning about the Japanese American incarceration during WWII and the historic events that took place at the site. The visual/emotional impacts of the proposed Lava Ridge project opens up the wounds of intergenerational and historical trauma of government overreach within the Japanese American community. The Minidoka NHS is a place where the U.S. unjustly incarcerated Japanese and Japanese Americans without due process because of lack of political leadership and racist pedagogy of the time. This project is using federal lands near a historically/spiritually/culturally significant site to the Japanese American community to propose a windmill farm. It is in the best interest of the BLM to understand how this project contributes to the historical trauma and the racist history caused by the U.S. government. The BLM is using it's federal governance to alter the environment to affect the Japanese American community's capacity to tell its own stories and share their experience. Also, the classification of the Japanese Americans and descents of Minidoka incarcerees as tourist and recreationist is insensitive and perpetuates the racist believe that Japanese Americans as foreigners. This is the same racist thinking that justified the incarceration of Japanese and Japanese Americans in WWII. The Minidoka NHS was a location where folks were involuntary relocated to and made home. The community are stakeholders and deserve to be treated with respect. They have a vested interest on the usage of the land. This decision will affect the Minidoka NHS negatively and believe the BLM should conduct more analysis on the potential detrimental long term effects of the project on the Japanese American Community. In conclusion, the "No action" alternative should be the only choice for this project.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11337-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Also see response to comment 11325-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding analysis of turbine noise from the project occurring at Minidoka NHS and response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. The potential for the project to cause psychological harm to members of the Japanese American community was determined, in part, through direct feedback received during the BLM's engagement efforts with the Japanese American community. In addition, in response to environmental justice–related public comments on the draft EIS regarding intergenerational and historical trauma, the BLM has reviewed literature provided by commenters and has incorporated information regarding the existing and extended consequences of historical trauma on former incarcerees into Section 3.6.1 (Environmental Justice Communities) of the EIS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. As noted in response to comment 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns): The current EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking to protect the historic properties associated with Minidoka NHS. The BLM is meeting all program and resource management planning requirements under the NHPA; NEPA; FLPMA; and other laws, regulations, and federal requirements; in advance of the current project. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA, completing the Section 106 process in consultation with consulting parties. Varying degrees of non-physical impacts to Minidoka NHS would result under any of the action alternatives, and various mitigation measures would be applied as stated in the EIS. The BLM is considering a No Action alternative for the project, by which it compares the potential impacts of the action alternative analyses in the EIS. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project, and will not make a decision on these matters until after the PA (see EIS Appendix 8 [Cultural Resources Programmatic Agreement]) is signed and a project ROD is released. The BLM decision on the project will be stated in the ROD.
11384-1	Connie Masuoka, Mark Takiguchi; Japanese American Museum of Oregon	This comment is submitted on behalf of the Board, staff and community of the Japanese American Museum of Oregon. [attachment] Public Comment Form Lava Ridge Wind Project Draft Environmental Impact Statement On behalf of the Japanese American Museum of Oregon, we write in support of Alternative A- No action. The Minidoka National Historic Site is a unique site for education, memory, and healing. The other Alternatives allow an incursion into the viewshed that significantly disrupts the experience of this site of conscience. We take exception to the characterization in the DEIS that the degree of visual change proposed in the other Alternatives is "Moderate." To the vast majority of the Japanese American Community, this disruption of the viewshed is another painful erasure of history and a message that our needs and history are less important that other concerns. The barren, desolate, and lonely vistas that remain today must be protected in order to accurately communicate the perspective of the over 13,000 people who were unjustly incarcerated there. Recall that the majority of these US citizens had little to no experience with this foreign and isolated landscape, being moved mainly from the Pacific Northwest, an area of lush beauty and ample physical resources. The selection of this site as a wind farm is testament to its harsh conditions and that experience is key to understanding the cruelty inflicted upon our community. The Park Service, Friends of Minidoka, and other organizations are stewards of this historic land. In partnership with them, we facilitate regular pilgrimages, educational programs, and restoration efforts that create powerful experiences and memories. The impact of these programs would be severely compromised by having many visible wind turbines on the horizon. In conclusion, while we support renewable energy and wind power, we feel strongly that any option other than Alternative A- No Action will fail to protect the integrity of the Minidoka National Historic Site. More importantly, the survivors of the incarceration, their families and descendants, and all Americans deserve to have this historic land preserved for learning and repair of spirit. Sincerely, Mark Takiguchi Interim Deputy Director	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. The BLM has revised the visual sensitivity for Minidoka NHS and surrounding WRC to be high sensitivity instead of moderate (used in the draft EIS); see EIS Section 3.16 (Visual Resources). However, the degree of visual contrast for wind turbines will remain moderate based on visual contrast rating analyses in Section 3.16. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS; this analysis found that all action alternatives would result in a major impact to the NPS' ability to implement its interpretive purpose at Minidoka NHS. Please note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Regarding mitigation measures and associated consultation related to cultural resources, including Minidoka NHS, please see response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns). EIS Section 3.6.1 (Environmental Justice Communities) additionally considers mitigation measures related to adverse environmental justice community impacts.
11455-1	Aiko E. Low	My grandmother, Asano Kanzaki was incarcerated at Minidoka. She had four American born sons who served in the US armed forces. Her oldest son, Akira never returned. Displayed in the window of her barracks were three silver stars and one gold star. Every mother, father, brother, sister at Minidoka had stories of hardships, sacrifices, loses and injustice. Minidoka is a National Historic Site where following generations of visitors come to learn from our country's mistake of mass racial hysteria. This is a solemn place where visitors come to honor and respect.	The BLM respectfully a'cepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War

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			Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11510-1	Cara Skillingstead	I am a fourth generation Japanese American descended from the Sakura family who was incarcerated at the Minidoka concentration camp during World War II - Family #35860, Barracks 17-F-S. This historic site holds deep and profound meaning for myself and my family as a representation of the deep wounds and intergenerational trauma that we live with to this day. It is critical to ensure the stories are not lost, diminished, or overpowered. As a national employee who serves people who are the most vulnerable to climate-related extreme weather and natural disasters, I understand the value of renewable energy for climate change resilience. However, for-profit companies often place the burden and environmental impacts of renewable and non-renewable energy sources on low-income, rural, and historically underinvested communities. These impacts often disproportionately impact communities of color. This proposal in particular would devastate the formerly incarcerated Japanese Americans who were held at Minidoka and their descendants. I acknowledge that there are many different agencies, people, and communities who are weighing in on this and who have different vested interests in this project and this land, but I urge you to please lift up the experiences, stories, and trauma of the wrongfully incarcerated Japanese Americans in the conversations about the placement and location of the wind farm project.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Impacts to historically underinvested communities are addressed in the EIS in Section 3.6.1 (Environmental Justice Communities). Impacts to Minidoka NHS as a historic property are analyzed in Sections 3.5 (Cultural Resources) and 3.16 (Visual Resources), including assessment in terms of how these would impact the interpretive purpose of Minidoka NHS under the supporting concepts (Civil and Constitutional Rights, People, Place, and WWII), through the four interpretive themes established through Public Law 110-229. See response to comment 7344-1 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding potential effects of the project on energy costs for consumers. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11525-1	Erin Schmith	I am an employee at the Japanese American Museum of Oregon and my connection to the proposed site of the Lava Ridge Wind Project is that I work every day with Japanese American survivors and descendants who were incarcerated at the Minidoka concentration camp and other camps during World War II. The site is a symbol for the profound loss that the Japanese American community in the Pacific Northwest suffered due to WWII incarceration. It is important that this community has the opportunity to physically experience the land where Minidoka stood as a place of healing, discovery, and connection to the past. The Draft Environmental Impact Statement for the Lava Ridge project does not adequately address the full significance of the Minidoka National Historic Site and the ways that survivors and descendants of Japanese American incarceration experience and utilize the site in the proposed alternatives. Section 3.5 of the DEIS outlines the concerns of the Japanese American community. This section outlines how, beyond the legally defined adverse effects, the community "may consider impacts to be of further severity from a cultural perspective and harmful to their rights as a community." The report preparer found that, for the Japanese American community, no mitigation of project impacts could protect the site from the intrusion and desecration of...a sacred site." The draft EIS acknowledges these concerns but fails to fully take them into consideration in the proposed alternatives, which do not adequately protect Minidoka and the larger WPA footprint as a site sacred to the Japanese American community. All of the alternatives other than Alternative A fail to sufficiently protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS, as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site.
11525-2	Erin Schmith	Table 3.6-3 characterizes visitors to the Minidoka National Historic Site as "tourists and recreationists," which does not accurately reflect the purpose Japanese Americans and others have for visiting the site.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions made to correctly represent the Japanese American community and Japanese and Alaska Natives.
11546-4	Dan Sakura	In light of the Biden Administration's commitment to advance environmental justice and combat racial prejudice directed against the AAPI community, I was disappointed with BLM's August 2021 Notice of Intent to begin the NEPA compliance for the Lava Ridge project. With little or no consulta□on with the Japanese American and Alaska Native communities, the BLM announced this project located on the historic footprint of the Minidoka Relocation Center, which is sacred ground. If approved by BLM, the Lava Ridge project would mark a giant step backward in the fight for racial justice and America's racial reckoning especially as the Biden Administra□on is leading efforts to protect Tribal Sacred Sites, acknowledge the shameful history of Federal Indian Boarding Schools and considering a proposal to designate the Emmet Till-Mamie Till Mobley National Monument.	See responses to comment 11535-49 regarding Biden administration executive orders, and to comment 11535-50 (see both in Table A-3h, Environmental Justice and Socioeconomics) regarding consultation with Japanese Americans and Alaskans, and to comment 1395-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding siting of the project.
11572-1	Elissa Dingus	As an employee at the Japanese American Museum of Oregon, I am connected with the survivors and descendants of survivors of WWII incarceration who would be strongly affected by the proposed Lava Ridge Wind Project site. The Minidoka concentration camp is a symbol of the profound loss suffered by the Japanese American community in the Pacific Northwest during WWII. It is a place of healing, discovery, and connection to the past, and it is essential that this community has the opportunity to physically experience the land where Minidoka stood. However, the Draft Environmental Impact Statement for the Lava Ridge project fails to adequately address the significance of the Minidoka National Historic Site and the ways that survivors and descendants of Japanese American incarceration experience and utilize the site in the proposed alternatives. The proposed alternatives, other than Alternative A - No Action, fail to sufficiently protect the significance of the land surrounding Minidoka NHS as a place of reflection and healing for the survivors who were unconstitutionally incarcerated, their descendants, and all who visit this International Site of Conscience. Furthermore, the report does not accurately reflect the purpose of Japanese Americans and others who visit the Minidoka National	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions made to correctly represent the Japanese American community and Japanese and Alaska Natives. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS, as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Please also note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS. The BLM has revised the visual sensitivity for Minidoka NHS and surrounding WRC to be

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		Historic Site, characterizing them as "tourists and recreationists" in Table 3.6-3. Their experiences are not for the purpose of tourism and recreation. This is a space of deep healing and connection. The degree of visual change proposed by Alternatives C-E are also inaccurately characterized as "moderate" in the same table. For a project whose footprint exceeds the area of Seattle's city limits, "moderate" does not come close to feeling like an apt description. Additionally, while the DEIS claims that Alternative C would minimize and avoid visual, noise, and traffic effects, it acknowledges that these effects would not be eliminated altogether. This characterization fails to accurately reflect the impact on visitors to Minidoka.	high sensitivity, instead of moderate; see EIS Section 3.16 (Visual Resources). However, the degree of visual contrast for wind turbines will remain moderate based on visual contrast rating analyses in Section 3.16.
11585-2	Preservation Idaho	Preservation Idaho has worked for many years to support protections for the Minidoka National Historic Site. The 13,000 Japanese incarcerated at Minidoka and their descendants today consider this location sacred and there continues to be an active community that honors the experiences there. The placement of wind turbines just two miles away is an adverse effect and an act of disrespect of the significance of the history of the site. The KOP simulation of the visual impact is misleading in that it only shows turbines, omitting the transmission towers, wires, and connecting systems. The impact during the day and the night will be significant, distracting, and permanently diminishing. Protecting this viewshed is of the utmost importance to Minidoka and Preservation Idaho.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. See response to comment 11454-2 (see in Table A-3y, Visual Resources) for information about the transmission line structures. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. The nearest potential turbine placement relative to Minidoka NHS would vary under each of the action alternatives (see Appendix 9 [Cultural Resources Potentially Affected by the Action Alternatives] of EIS Appendix 8 for information on the distance of the nearest turbine siting corridor relative to previously recorded cultural resources potentially affected by the action alternatives, including Minidoka NHS, under Alternatives B, C, D, and E). Of the alternatives, Alternative E represents the farthest distance for potential turbine placement relative to Minidoka NHS, where nearest turbine siting corridor distance is 8.4 miles from Minidoka NHS. Additionally, the BLM's Preferred Alternative, which seeks to further reduce visual impacts to Minidoka NHS, is analyzed in the final EIS.
11593-1	Maya Abo Dominguez	In section 3.6.2.1.3, the DEIS references "Historical interactions between the Japanese American community, the federal government, and project developers" that "have been filled with ongoing points of frustration and conflict." This does not begin to sufficiently describe the situation. It is important to note that the BLM, NHS, NPS are all part of the Department of Interior, the same department as the War Relocation authority, which was transferred to the DoI February 16, 1942 as a result of EO 9423. This fact is absent from DEIS and should be made clear. It is not surprising then, that the same body that incarcerated my ancestors is considering a large wind project on the same site. I strongly urge that Alternative A - no action is taken and also request that the "Historical Interactions" referenced above is expanded to be more complete and highlight that both the WRA and BLM were/are a part of the DoI.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. EIS Section 3.6.1.1.1 (Existing and Future Trends and Actions) states, "Historical interactions between the Japanese American community, the federal government, and project developers have been filled with ongoing points of frustration and conflict, which has fostered feelings of distrust and being dishonored within the Japanese American community." The BLM considers this to adequately capture the sentiments expressed by the Japanese American community during engagement efforts conducted by the BLM. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Please note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS. Please note that the project would not be sited on Minidoka NHS and is specifically excluded from any NPS-administered lands, where NPS decision-making authority would apply. The BLM is the lead federal agency, and the NPS has no authority in the BLM's decision making on the project. The NPS participates as a cooperating agency on the BLM's undertaking to uphold the NPS's mission and interests in preserving and managing Minidoka NHS, among other NPS concerns in the surrounding region. The Department of the Interior and the Secretary of the Interior do have overarching authority and oversight of the BLM.
11598-9	Idaho Conservation League	Minidoka National Historic Site As noted in our scoping comments, ICL is particularly concerned about potential impacts to the Minidoka National Historic Site, located northeast of Twin Falls, Idaho. Minidoka was one of the isolated internment sites that housed unjustly relocated and incarcerated Japanese Americans during World War II. Over 13,000 Japanese Americans were imprisoned at the site. Today, the National Park Service maintains the former camp as a memorial to those Americans of Japanese ancestry who were wrongfully incarcerated at the camp and as a reminder to our citizens of the injustice forced on so many through racial profiling, fear, and hatred. The original proposed Plan of Development includes wind turbines within just two miles of the Site and many within the original footprint of the 33,000 acre internment camp. At heights over 700 feet tall, these imposing structures, and associated electric lines, could dominate the viewshed for miles. This infrastructure could impact Minidoka visitors as they approach the site and attempt to experience the forced isolation that is part of the historical relevance of the site. None of the current alternatives adequately avoid, minimize, or mitigate the impact to the Minidoka site. The visual impacts of all the alternatives for Lava Ridge project to the Minidoka National Historic Site are significant and will alter the nature and feeling visitors derive from the stark and isolated location. Retaining the open vistas allows visitors to "better understand and connect to the daily lives at Minidoka" (Minidoka Foundation Document). In discussions with Friends of Minidoka, ICL staff learned about the importance of maintaining the feeling of isolation through Minidoka's viewshed. Friends of Minidoka	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 11622- 4 regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Please note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses. in the EIS. See EIS Section 3.16 (Visual Resources) for analysis of the degree to which the project would or would not dominate views and restrict or retain open vistas from Minidoka NHS, including from KOPs such as the Honor Roll on the entry approach to the NHS and the visitor center, in relation to the various action alternatives. A discussion of the historic integrity, including feeling and setting, of Minidoka NHS is included in EIS Section 3.5 (Cultural Resources). Regarding mitigation measures and associated consultation related to cultural resources, including Minidoka NHS, please see response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns). EIS Section 3.6.1 (Environmental Justice Communities) additionally considers mitigation

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		hosts annual pilgrimages to the historic site to pay homage to survivors and descendants of incarcerees. For many, maintaining the integrity of Minidoka is necessary to continue the remembrance of this civil rights violation and the resilience of the Japanese American community. Any project development in the area must respect this experience. As stated above, ICL again underscores its recommendation that the BLM use the opportunity afforded by this NEPA process to designate areas around the Minidoka National Historic Site as unavailable for future energy development and prioritize important areas for habitat restoration. These areas could be well-suited for site-specific protections via an Area of Critical Environmental Concern (ACEC) designation following additional public review.	measures related to adverse environmental justice community impacts. Regarding ACECs, please see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11603-1	Sheri Freemuth	I am deeply concerned by the lack of effective and timely resource management planning in this area. The Minidoka National Historic Site (NHS) is a critical area of cultural importance to state, region, and nation. The haphazard manner in which the federal public land agencies have established guidelines and policies for the surrounding lands, within their jurisdictions, has resulted in this unfortunate application.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. As stated in EIS Appendix 2, public lands in the analysis area are managed in accordance with the BLM SFO's monument RMP (BLM 1986), as amended, and the 2015 greater sage-grouse ARMPA (BLM 2015). The Proposed Action and alternatives described in this EIS are in conformance with both of these plans.
11610-1	Lisa Shiosaki Olsen; Intermountain District Council-Japanese American Citizens League	As you develop the EIS, I encourage the BLM to work with the National Park Service to ensure that all alternatives in the Draft Environmental Impact Statement preserve Minidoka's fundamental resources and values (FRV) unimpaired for the benefit of future generations. Specifically, I request that all of the alternatives preserve Minidoka's remote environmental setting, as provided in the Park's Foundation Document: "Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood…Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka."	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the EIS's address of impacts to the natural and cultural landscape surrounding Minidoka NHS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Regarding mitigation measures and associated consultation related to cultural resources, including Minidoka NHS, please see response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns).
11617-1	Stephen Kitajo	The Lava Ridge Wind Project Stakeholder Assessment and Engagement Report was produced by Langdon Group/Keans & West for BLM in August of 2022, before the release of the DEIS. This report found that the BLM should try to engage with stakeholders for future meetings, saying that "appropriate meeting locations, dates and times should be coordinated with Local Japanese American community groups." When the BLM announced that a single public open house to discuss the DEIS would be held in the Seattle area in March 2023, the Japanese American community was surprised because no community groups were contacted to coordinate the open house. That report also found that increased "cultural competency training within BLM is warranted for meaningful engagement." When I attended the open house, I attempted to discuss with the BLM representatives how the Japanese American community in Seattle had a long history of being forced to live in certain areas of the city through redlining and racially restrictive housing covenants, and how Minidoka could be seen as a continuation of that injustice when looking at the community's history. Instead of a discussion, I found myself having to educate the representatives on this history. Based on the lack of cultural competency training and ability to meaningfully engage with the Japanese American community that I experienced at the open house, I do not believe the DEIS adequately incorporates the true significance of Minidoka to the Japanese American community. It would be irresponsible of the BLM to move forward with any action until this is adequately understood.	The final EIS was updated to include a section on the Minidoka NHS interpretive purpose, which addresses and assesses impacts under each project action alternative to the interpretive purposes established by law. See response to comment 11535-50 regarding meaningful outreach and engagement efforts conducted by the BLM and response to comment 11535-49 (see both in Table A-3h, Environmental Justice and Socioeconomics) regarding compliance with environmental justice–related executive orders.
11622-1	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	The Minidoka Pilgrimage dates back to 2003, when survivors and their descendents first journeyed to the former site of the Minidoka War Relocation Center from Seattle, Portland and across the country to share their stories, reunite with dear friends, and heal from the pain inflicted upon them by the unjust persecution and imprisonment by their own government. Since then, this has become an annual event and 2023 will mark our 20th pilgrimage event, including three that were hosted online due to the COVID19 pandemic. In 2001, President Bill Clinton designated the Minidoka Internment National Monument as the 385th unit of the National Park Service. The Pilgrimage's official inception came on the heels of the designation of Minidoka as a National Monument, wherein the site became a place of honor and healing, and not only of oppression and grim memorial. We seek to honor the courage and sacrifices of Japanese American veterans, Gold Star families and resistors, who spoke out against the unjust incarceration. As noted in our scoping letter submitted by survivors and descendants: Annually, many of us are drawn to the Minidoka Pilgrimage to remember, to heal and ally ourselves with those who confront injustice. Desolation creeps into our minds and bodies when we walk along the burning sandy paths. At the ceremonial conclusion of our pilgrimage, we bow our heads to honor the soldiers who made the ultimate sacrifice in defense of our freedoms. We can hear the wind flapping against the American flag as their names are read. To help understand the truth of the Minidoka incarceration, we are planning an in-person Pilgrimage this year from July 6-9, at Minidoka and the College of Southern Idaho in Twin Falls. We wish to invite you and the BLM team to join us for sessions at the College of Southern Idaho (July 7), a tour of the Minidoka (July 8), and a closing ceremony at the Honor Roll (July 9).	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Thank you for the invitation to experience the events held at Minidoka and please know that BLM specialists on the project have contemplated and planned to attend either those events cited, or other events at Minidoka NHS, as appropriate. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11622-5	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	Significance The DEIS does not adequately describe the impact of the project on Minidoka's statement of significance, which includes the "most important resources and values of the park unit," such as Human, Civil, and Constitutional Rights.2 The Honor Roll is central to Minidoka's significance relating to patriotism, citizenship and choices: Minidoka National Historic Site provides a forum for understanding how Nikkei demonstrated	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation

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		citizenship and patriotism through individual choices, which affected families and communities. Choices reflected a range of responses including serving valiantly in the military, supporting the war effort on the home front, and protesting the civil injustice.3 We have said much about how vital an untouched Minidoka National Historic Site is to the Japanese American community. We must also remind the BLM how important this site of conscience is to ALL American people. In order for reckoning and healing to occur for the United States as a whole, all Americans must know about the mistakes made by our country and the courage it took to offer apology, reparations, designate parks and memorials, and make significant funding investments to preserve and interpret Minidoka and other sites. This is the sign of a great nation. Minidoka and the important lesson it shares must not be impeded.	Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.
11622-12	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	We agree with the Friends of Minidoka analysis of the BLM's inadequate and inappropriate description of Minidoka survivors and descendants as "tourists and recreationalists" in the DEIS. Tourists and recreationalists partake in activities for enjoyment and pleasure, with the privilege of selecting the locations they travel to and choosing the activities to engage in before returning home. It is important to remember that the Japanese American community did not have a choice in their location or their activities when they were forced into Minidoka, nor were they allowed to return to their homes, if they still had one. To say otherwise does not accurately portray the reality of their situation. We encourage BLM to accurately and adequately describe the Minidoka community in the final EIS.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions made to correctly represent the Japanese American community and Japanese and Alaska Natives.
11652-2	Natasha Varner	To date, the voices of Minidoka survivors and their descendants have not been taken seriously as key stakeholders. As a case in point, the DEIS identifies Minidoka NHS as being a place for "Tourists and Recreationalists," failing to recognize that a primary constituent of the site consists of survivors and descendents of World War II incarceration. The community has consistently stated that Lava Ridge would result in a significant impairment of resources. As key stakeholders, their concerns should be accorded due respect in any plans that would impact the site.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions made to correctly represent the Japanese American community and Japanese and Alaska Natives. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site.
11772-2	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	As the organizers of the annual Minidoka Pilgrimage, we understand the unique needs of survivors and descendants to be able to focus on the traumatic experiences of life at Minidoka, learn from other pilgrimage participants, and experience the sense of healing that the pilgrimage provides. We appreciate BLM adding KOP-16 (the view of the Honor Roll looking east). The views of the spinning turbine blades backlit by the morning light will dishonor those who served, those who did not come home and the sacrifices of Minidoka's 73 Gold Star families. One of the most important parts of the pilgrimage is the Closing Ceremony on the last day of the Pilgrimage at the Honor Roll, which is held in the morning to avoid the midday heat. At the closing ceremony, the audience faces the speakers and the reconstructed Honor Roll. It is a solemn occasion, similar to events honoring America's veterans at sites across the country. Along with a color guard and local veterans, we commemorate the military service of 1,000 Japanese Americans from Minidoka who served in the military. We clearly read the names of the 73 individuals who gave their lives to defend freedom while their families' freedom was taken away by their own government. This act unleashes a wash of visible and audible pain among the participants, as we create an opportunity to grieve together as a community both for the slain soldiers, and for our community as a whole. LS Power's deliberate decision to site the wind project in a location that serves as the visual backdrop of the Honor Roll reminds us of the Hood River incident in Oregon. In 1944, The American Legion removed 16 names of Japanese American soldiers from the county honor roll. After a national outcry, the American Legion restored the names to the Honor Roll in 1945.1 It also reminds us that LS Power previously sought to build the SWIP-N line on a ROW that would have towered over the Honor Roll and entrance to the park. We cannot help but find ourselves wondering how LS Power's next project will threaten the Honor Roll once more. The size and location of both Alternatives C & E would distract participants' attention from commemorative events, time with families and friends (both new and old), and healing painful emotional wounds. For example, a vital part of our Pilgrimage are the tours on the site which offer detailed interpretation of all of the buildings and and locations on the park site, including the foundation of the reception building, the recreated guard tower, the Honor Roll, the replica fence, the swimming hole, the fire station, the visitor center, the root cellar, the baseball field, and Block 22. In both site tour and Closing Ceremony instances, we are compelled to note a commonality. We acknowledge the creation of the KOPs, but these do not convey how the full experience of our ceremony and tours would be impacted by the visual distraction of multiple walls of wind turbines. Furthermore, if walls of wind turbines are built, each time they are on the site, survivors and descendants of the incarceration would be confronted with yet another piece of physical evidence as to how the United States government has dishonored their histories at this place. They would unfortunately also be reminded that Federal tax credits and tax dollars helped to fund and subsidize this project, and would have cause to once again question the United States' promises to right wrongs against us and offer us the dignity and justice we deserve.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. EIS Section 3.16 estimates the extent to which the action alternatives may or may not tend to commonly attract an observer's attention and view based on their various proposed turbine locations. Turbines would each have considerable spacing between them and the setbacks and orientation of turbine corridors would further assist in the visual spacing of the turbines as they would appear from Minidoka NHS. Please note that the application of KOPs, such as described in EIS Section 3.16 (Visual Resources), is only one aspect of how the BLM analyzed project impacts to Minidoka NHS.
11772-5	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	The DEIS does not adequately describe the impacts of the wind project on commemorative events and the Pilgrimage's ability to promote public understanding, education and involvement, another fundamental resource and value. Cultural Competency We agree with the Friends of Minidoka analysis of the BLM's inadequate and inappropriate description of Minidoka survivors and descendants as "tourists and recreationalists" in the DEIS. Tourists and recreationalists partake in activities for enjoyment and pleasure, with the privilege of selecting the locations they travel to and choosing the activities to engage in before returning home. It is important to remember that the Japanese American community did not have a choice in their location or their activities when	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS.

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		they were forced into Minidoka, nor were they allowed to return to their homes, if they still had one. To say otherwise does not accurately portray the reality of their situation. We encourage BLM to accurately and adequately describe the Minidoka community in the FEIS.	
11775-3	Stephen Kitajo	The DEIS also does not adequately convey the historical efforts of LS Power to disrupt and harm the Minidoka National Historic Site in their pursuit of profiting off the land that Japanese Americans labored over while incarcerated at Minidoka. In 2010, LS Power attempted to construct the SWIP-N power transmission line directly over the Honor Roll, one of the most iconic parts of Minidoka. While ultimately unsuccessful, LS Power then deliberately chose to propose placing towering wind turbines directly within the historic footprint of Minidoka with the Lava Ridge wind project. I, along with many others in the Japanese American community, am fed up with LS Power's greed and disregard for the importance that Minidoka has to us. I do not want to live the rest of my life wondering what LS Power's next threat to Minidoka will be or wondering how future descendants will be warding off LS Power when I am gone. The cumulative effects of LS Power's efforts are a major threat to Minidoka and warrant strong protections.	MVE outlines their consideration for siting the project in the general area and earlier efforts to develop the project in other locations. This information can be found in MVE (2023) and in Alternatives Considered by MVE (Appendix C in MVE [2023]).
11779-3	Chris Cody, Betsy Merritt; National Trust for Historic Preservation	If Alternative E or any other alternative that will result in adverse effects to Minidoka is selected, the establishment of protections for the remainder of Minidoka's viewshed on BLM land is of paramount importance. This project must not serve as a catalyst or encouragement for additional development, and an appropriate level of protection for Minidoka should be established to prevent future threats. In our view, a Section 106 agreement, negotiated through consultation, would be a useful mechanism for developing and enforcing these future safeguards. This is not the first time the National Trust and others have had to rally to the defense of Minidoka in response to proposals for nearby projects with adverse effects,6 and we would like to work with BLM on the development of enhanced protections for Minidoka (regardless of the outcome of this particular ROW grant) in the hopes that more permanent protection can be secured.	See response to comment 12859-8 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding BLM consideration of additional protections at Minidoka in addition to those practices described in the body of the EIS. Regarding development of enhanced, or permanent, protections for Minidoka's viewshed outside of the NPS-managed NHS within the greater WRC; it is important to note that there is much private land comprising this area that is used for agricultural purposes, and this should be considered toward the effectiveness of establishing uniform protections for the viewshed in so much as the BLM holds no authority on private land development. However, the BLM is interested in continued consultation of this on this topic with the National Trust for Historic Preservation under the NHPA Section 106 process for the project.
11808-2	Jon Ochi	The LRWP turbines would stand starkly around MNHS to create an "adverse effect" on the ambiance of MNHS. The unspoken message seems to say, "The MNHS is insignificant. Your sufferings were not more important than building these turbines which will dominate the horizon like the residents of Minidoka were once dominated and humiliated." Please read the quote from the National Historic Preservation Act of 1966 (the italics are mine): THE NATIONAL HISTORTIC PRESERVATION ACT AND SECTION 106 The National Historic Preservation Act (NHPA), which became law in 1966, establishes our national policy on the preservation of historic and cultural places. Adverse effect (Section 106)- Defined in Section 106 of the National Historic Preservation Act of 1966 (Section 106) regulations at 36 Code of Federal Regulations (CFR) Part 800.5. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places (National Register) in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. Examples of adverse effects on historic properties include, but are not limited to: • Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; • Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features; To summarize Point 1 (Disrespect to MNHS): The LRWP makes MNHS feel relatively "insignificant" compared to the 740 foot tall turbines. To Japanese Americans the MNHS provides tangible proof of extreme racial prejudice. Legally, the NHPA of 1966 prohibits "Adverse Effects" to historic properties. Adverse effects include, diminishing the "setting" and "feeling" and "change of character." Impacts can be "visual" even when "farther removed in distance." And finally, adverse effects can be "cumulative." Consider the Cumulative Effects of both the LRWP also the even larger Taurus Wind Project, located a mile west and north of MNHS.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. As noted in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), Minidoka NHS is recognized as a nationally significant site listed on the NRHP under Criterion A (historic event). The analyses presented in the EIS have found that impacts to Minidoka NHS will be adverse. However, the EIS (Section 3.16 [Visual Resources]) has found that, with sufficient setbacks, the wind turbines from the project will not dominate the setting of Minidoka NHS. The EIS includes analyses of cumulative effects in the aforementioned sections. See response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Please note that the NHPA does not prohibit adverse effects to historic properties; the NHPA requires the lead federal agency to take into account the effects its undertakings will have on historic properties and to resolve adverse effects on historic properties through their avoidance, minimization, or mitigation. If an adverse effect from an undertaking is unavoidable, the NHPA requires the lead agency to consider measures to mitigate the adverse effect. Varying degrees of visual impacts to Minidoka NHS would result under any of the action alternatives, and various mitigation measures would be applied as stated in the EIS. The BLM is preparing a PA (see EIS Appendix 8 [Cultural Resources Programmatic Agreement) to complete review of the project under NHPA Section 106 and to address project effects.
11815-1	Liz Phillips	The main reason is that all the proposals A-E are all visually too close to the Minidoka Historical site. I am basing this by personal experience of wind turbines in Columbia County and the study done by UChicago Argonne, LLC, a U.S. Department of Energy Office of Science laboratory. https://www.google.com/url?sa=t&source=web&rct=j&url=https://blmwyomingvisual.anl.gov/docs/WindVITD.pdf&ved=2ahUKEwjd2eT0vu_9AhU2L0QIHYOmB8UQFnoECBQQAQ&usg=AOvVaw0eaZoXG-uSbzh1LO_aeUVz <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Furl%3Fsa%3Dt%26source%3Dweb%26rct%3Dj%26url%3Dhttps%3A%2F%2Fblmwyomingvisual.anl.gov%2Fdocs%2FWindVITD.pdf%26ved%3D2ahUKEwjd2eT0vu_9AhU2L0QIHYOmB8UQFnoECBQQAQ%26usg%3DAOvVaw0eaZoXG-uSbzh1LO_aeUVz&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8999e1ed51194ac1bb7908db42094561%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638176380246435971%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=QhHPoj0tFT1x0ab0Pd2axBtTtEem0kYDYjH6LzLSujc%3D&reserved=0> Wind Turbine Visibility and Visual Impact Threshold Distances in Western Landscapes Abstract was from a study sponsored by the U.S. Department of the Interior Bureau of Land Management. 377 observations of five wind facilities in Wyoming and Colorado were made under various lighting and weather conditions. "The facilities were found to be visible to the unaided eye at 36 miles under optimal viewing conditions, with turbine blade movement often visible at 24 miles. Under favorable viewing conditions, the wind facilities were judged to be major foci of visual attention at up to 12 miles and likely noticed by casual observers at 23 miles." "A conservative interpretation suggests that for such facilities would be unlikely to be missed by casual observers at up to 20 miles and that the facilities could	The study *Wind Turbine Visibility and Visual Impact Threshold Distances in Western Landscapes* (Sullivan et al. 2012) is relied upon in the EIS, as cited in EIS Sections 3.5 (Cultural Resources) and 3.16 (Visual Resources) and listed in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers). The draft EIS did find adverse effects from project wind turbine visibility to Minidoka NHS under all action alternatives, with the degree of effects varying by distance. A project-specific VRI was collected and turbine visibility simulated, as referenced in the project visual resources technical report (SWCA 2024).

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		be major sources of visual contrast at up to 10 miles showed visibility can be seen at 30 miles." Therefore the proposed 8-9 miles distance from the Minidoka Historical Site is too close	
11817-1	Satsuki Ina	There is an impact that is not addressed in your DEIS. The proposed Lava Ridge Wind Project would cause irreparable negative impacts to the viewshed and the immersive feeling at the site that is integral to the healing and educational experience at the site that takes place every day. It is like the many battlefield sites such as Gettysburg National Military Park in Pennsylvania that is preserved today and is now a sacred healing place for descendants and an important place for learning for the public. They should be protected from negative physical and non-physical impacts as stated in the National Parks mission: "The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations."	See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
11821-76	Laura Cunningham, Kevin Emmerich, WildLands Defense	Magic Valley, Idaho: This area is targeted for large-scale solar and wind energy projects. It contains culturally significant sites such as the Minidoka National Historic Site, the site of a former Japanese Internment camp during World War 2. There is great opposition to a proposed wind project in this area by the people who have a history with the site. The seek to turn the place on mourning into a place of healing.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
11842-2	Erin Nishijima	As an educator and graduate student, it is harmful mentally, emotionally, and spiritually to witness BLM (a powerful organization) taking advantage of a community of color and a sacred space that represents a devastating part of our history. By choosing to place Lava Ridge Wind Farm here, you are choosing to show youth and all communities of color that our feelings, words, values, and spaces aren't important. The DEIS fails to recognize the importance of preserving the historic nature of the land, including the integrity of the site, feeling and association of historic events, and its immersive educational experience. Your motives directly do not reflect nor address cultural competency which President Biden mandates in his Executive Order on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whitehouse.gov%2Fbriefing-room%2Fpresidential-actions%2F2023%2F02%2F16%2Fexecutive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cc45997f92a714abdb0c108db41f8df81%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638176309524563854%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=ZEQLtREazYEj%2Fdry9OVEI%2BRVR4%2Bq4HEiriyrQniwn2o%3D&reserved=0> DEIS states that the Lava Ridge Wind Farm turbines are "moderate" degrees of visual change to Minidoka NHS's viewshed yet I would disagree. This project fails to protect the integrity of the site as having wind turbines as tall (if not taller) than the Seattle Space Needle, would be hardly unnoticed. Minidoka National Historic Site is a prime example of a place of harm, discrimination, isolation, and injustice made visible for history remembrance, a place of congregation, and a physical space for those incarcerated and their descendants.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS. The BLM has revised the visual sensitivity for Minidoka NHS and surrounding WRC to be high sensitivity, instead of moderate; see EIS Section 3.16 (Visual Resources). However, the degree of visual contrast for wind turbines will remain moderate based on visual contrast rating analyses in Section 3.16. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site.
11869-24	Raul Labrador, Josh Turner; Idaho Attorney General's Office	Fourth, the Project will dishonor the Minidoka National Historical Site—a memorial to the injustice of Japanese American internment camps that serves as a powerful reminder of the perils of acquiescing to government overreach in times of crisis. By placing 400-foot-tall wind turbines around the Minidoka Site, the Lava Ridge Wind Farm will strip the site of its historical authenticity and lessen its impact.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Please note that in none of the action alternatives is Minidoka NHS surrounded by turbines. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
11886-5	Sandra Eto	The importance of the Minidoka WRC to the former internees, their descendants, and the American people is not just the buildings that remain or have been relocated to the 388 acres, or the "cultural resources" used to represent the WRC and all that transpired there. Today the environmental setting and its relatively vast expanse of emptiness, greeting the individuals arriving at the site, is integral to the internees' experience in that it evokes the desolation and harshness that greeted the prisoners after more than 2 days by train without knowing their fate. The NPS recognized this inextricable tie between the environmental setting and the Minidoka NHS in its action to add a conservation easement to the western boundary in 2012 (Federal Register, Vol. 77, No. 211, p. 65906), stating: The inclusion and acquisition of a conservation easement interest in this property will enable the National Park Service to preserve the open space and viewsheds of the general area and thereby more accurately interpret the events that took place during the Japanese-American internment here from 1942 to 1945.	See response to comment 11869-24 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
11886-6	Sandra Eto	The importance of the Minidoka NHS was emphasized in the Foundation Document, which states the Minidoka NHS offers the opportunity "…to interpret the historic events and lives impacted by the exclusion, forced removal, and unjust incarceration of Nikkei during World War II." (p. 7). The Foundation Document notes the site's listing in the NRHP stating, "With designation as a unit of the national park system in 2001, the historic site of Minidoka was protected for future generations and interprets its important civil rights lessons and the stories and lives in the individuals incarcerated there from 1942 to 1945." (p. 8). The Foundation Document recognizes the importance of the environmental setting in telling the story of the internees' experience, from the moment they arrived and throughout their residency: Minidoka's remote location in the high desert of Idaho provides an	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. As noted in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), Minidoka NHS is a nationally significant site listed on the NRHP under Criterion A (historic event). Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as how the EIS addresses impacts to the natural and cultural landscape surrounding the site. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and

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		immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood…. The smell of high desert sagebrush contributes to this environmental setting. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. (p. 13). Please note that included in the Fundamental Resources and Values identified for the Minidoka NHS, is commemoration and healing, wherein the document states, Minidoka and the Bainbridge Island Memorial provide places for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.	Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS, further addressing NPS interpretive themes.
11886-7	Sandra Eto	Would approval of the proposed project, regardless of alternative, preclude implementation or constrain or restrict consideration of the currently identified planning and management goals and objectives in the Foundation Document? Approval of the proposed project, regardless of alternative, would be an irreversible and irretrievable loss of resources, regardless of whether the structures are to be removed after 30 years. As stated in the Foundation Document, cultural landscapes and viewsheds on the Minidoka NHS are considered fundamental resources and values that are essential (fundamental) to achieving the purpose of the park and maintaining its significance. Should these resources and values be impaired, the park purpose and/or significance could be jeopardized (p.13), particularly connection, commemoration, and healing.	See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS, further addressing NPS interpretive themes and considering effects to NPS plans/planning for Minidoka NHS. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site.
11978-30	Magic Valley Energy, LLC	Section 3.5.3 – Minidoka War Relocation Center and Minidoka National Historic Site 26. The DEIS states: "Figure 3.5-4 illustrates the simulated worst-case condition, estimated to occur up to 2% of the year due to prevailing wind direction, for Alternative B with 6-MW wind turbines, as viewed from KOP 1 (Minidoka NHS Visitor Center). The simulated turbines would be 1.7 miles from KOP 1. Figure 3.5-5 illustrates the simulated worst-case condition for Alternative B with 6- MW wind turbines, as viewed from KOP 2 (Minidoka NHS Block 22 Barracks) at a nearest distance of 5.0 miles from the KOP." a. MVE Comment: By showing only simulated postconstruction conditions and omitting existing conditions, Figures 3.5-4 and 3.5-5 may conceal the important contextual point that the large overhead electric transmission structures and transmission lines appearing in the foreground, which are among the most visually prominent features shown in the figures, represent existing infrastructure within the viewshed of the Minidoka National Historic Site. Omitting photographs of the existing conditions could confuse readers of the FEIS, who might misconstrue that the visually prominent transmission lines and transmission structures are part of the proposed Project. Readers making this inference would come away with a vastly exaggerated impression of the Project's visual impacts at the Minidoka National Historic Site. In order to more fairly represent the visual impacts of the Project, MVE requests that BLM either 1) add new figures to the DEIS that show the existing conditions for each KOP given for comparison to the figures (i.e., Figure 3.5- 4, Figure 3.5-5) representing visual resources under various alternatives, or 2) revise Figure 3.5-4 and Figure 3.5-5 to show both existing conditions and simulated post- construction conditions. In addition, FEIS language surrounding the existing figures should reference the new or revised figures, specifically describing that the transmission line in the immediate foreground is not affiliated with the Project, nor owned by MVE, to avoid potential confusion.	Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS, includes three figures showing both the existing condition and simulated condition for the Preferred Alternative for KOPs 1, 2, and 16. Additional text has been incorporated into the final EIS clarifying that the transmission line as seen in Figures 3.5-4 and 3.5-5 is existing infrastructure that is unrelated to the project or MVE.
11978-33	Magic Valley Energy, LLC	Section 3.6.2.2.2 – Environmental Justice and Socioeconomics: Noise Impacts 29. The DEIS states: "As described in the affected environment, the NPS modeled existing noise levels for Minidoka NHS to be approximately 32 dBA (NPS 2015). However, because Minidoka NHS and Minidoka WRC are considered sensitive noise receptors, the noise impact assessment performed for the project conservatively assumed existing background noise levels for NSAs within and near to Minidoka NHS and Minidoka WRC to be 19.3 dBA (Leq) or 27.9 dBA (Ldn), which is considered very quiet and comparable to the sound of rustling leaves or a soft whisper (SWCA 2022)." a. MVE Comment: Scientific analysis in the FEIS should aim to utilize the best data available. The DEIS mentions the NPS 2015 report that modeled existing noise levels specific to the Minidoka NHS (i.e., the location under analysis), reporting that the location-specific modeled existing noise level is approximately 32 dBA. Therefore, the noise analysis should be based on that location-specific 32-dBA noise level as the background noise level, instead of the 19.3 dBA (Leq) or 27.9 dBA (Ldn) that reflects a noise level used for typically quiet spaces, such as schools, libraries, hospitals, and places of worship. Using the 19.3 dBA (Leq) (27.9 dBA (Ldn)) background noise level does not represent the best available scientific data for the Minidoka NHS location in question and would result in an overstatement of the Project's effects. The existing noise levels for Minidoka NHS should be based on the NPS 2015 report (i.e., 32 dBA) in lieu of an arbitrarily applied background noise level of 19.3 dBA (Leq) (27.9 dBA (Ldn)).	Section 3.6.1 (Environmental Justice Communities) in the final EIS compares the previous NPS (2015) noise level assessment at Minidoka NHS with the noise parameters used by the BLM for assessing the project area both as a whole and for Minidoka NHS receptors. The discussion of noise at Minidoka NHS in Section 3.6 provides both the comparison with project assessments and with NPS (2015) assessments. In both cases, noise levels under the Proposed Alternative would increase over assessed baseline conditions.
11978-122	Magic Valley Energy, LLC	24. Section 3.05 Table 3.5-2 Overlap of the auditory component of the Non- physical APE with Minidoka NHS and WRC (acres/square miles) Table 3.5.2 Table 3.5.2 lists the auditory overlap of each Alternative with MNHS and WRC Together. These are separate resources with vastly differing resource areas. Combining the MNHS and WRC may overstate impacts to MNHS. This table would be more accurate if these two resources were represented separately.	Table 3.5.6 in Section 3.5 (Cultural Resources) of the final EIS includes separate rows for Minidoka NHS and Minidoka WRC auditory APE overlap.

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11978-123	Magic Valley Energy, LLC	25. Section 3.05.4 “The NPS expressed concern that the impacts on dark skies above the park and direct line of sight to lights on the horizon could significantly alter visitors’ experience and capacity to view the nightscapes formerly experienced by incarcerated Japanese Americans at the camp (NPS 2021). Anticipated change in sky brightness is addressed in Section 3.16.2.2 with Alternative B analysis, and An Assessment of the Impact of Lighting at the Proposed Lava Ridge Wind Project on the Night Skies of the Craters of the Moon National Monument and the Minidoka National Historical Site supports that analysis (Dark Sky Partners 2022).” This statement may be confusing and misleading to the reader. MVE is requesting an edit to: "Although the NPS expressed concerns over the impact to dark skies above the park and direct line of sight to lights, Dark Sky Partners 2022 Report noted that brightness impacts from the Project would not be perceptible. Anticipated change in sky brightness is addressed in Section 3.16.2.2 with Alternative B analysis, and An Assessment of the Impact of Lighting at the Proposed Lava Ridge Wind Project on the Night Skies of the Craters of the Moon National Monument and the Minidoka National Historical Site."	The requested edit is incorporated into the final EIS.
12048-3	Karen Matsumoto	The Minidoka War Relocation Authority Center has been listed on the National Registry of Historic Places since 1979 – this designation places Minidoka on the official list of the Nation’s historic places worthy of preservation. Because Minidoka’s viewshed is a traditional cultural property, it is also eligible for listing on the National Register. We need to protect this important historic place, which also includes the viewshed from the site – the viewshed cannot be separated from the concentration camp site itself. Page 2 As you know, once the project is constructed, it will forever change the experience of former incarcerees and their families, as well as any visitors to Minidoka. The Minidoka Historic Site will be transformed from a sacred site to a place with diminished impact. The U.S. government promised the Japanese American community that the site would be a place honor those unjustly incarcerated, and to allow the wind project to proceed would blatantly disregard that promise.	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM’s development of the Preferred Alternative. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site.
12080-1	Zoe Barker-Aderem	hank you for the opportunity to provide a comment on the unexceptable effects of the Lava Ridge Wind Project to the Minidoka National Historic Site. By completely changing the viewshed, the experience of those who survived camps at Minidoka NHS will be irreparably altered. The Minidoka NHS is a place of reflection and healing not just for survivors of the camps; but their descendants. While the DEIS may identify this as a tourist site, that's minimizing and inaccurate. These are necessary places for us to gather, learn, mourn, and get creative about how remembering the past can protect the future.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing and response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM’s development of the Preferred Alternative. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
12136-1	Diane Honda	A major component of one’s experience at the Minidoka National Historic Site (NHS) is its sense of isolation and desolation which helps a visitor understand the sense of abandonment incarcerees felt. Its viewshed – in the middle of no-where, a point of no return, a place without signs of civilization is central to that experience. Eye-catching wind towers will detract from that experience, become a point of focus, as will wind tower lights – even if sensor-based. Those visual impacts cannot be “subtracted” from a Minidoka NHS visitor viewshed experience. If they are there/lit, they become part of the visitor experience. The Minidoka National Historic Site is not a tourist attraction like Disney World. Categorizing the Sensitive View Group under Table 3.6-3 Environmental Justice Key Observation Points for KOP 1 & 2 as “Tourists and Recreationists” is insensitive (bordering on insulting) and demonstrates a lack of understanding what took place at this site and how that experience continues [see original letter for link that was here] to negatively affect members of the Japanese American community. This is a solemn and meaningful place in the Japanese American community. (One wouldn’t use “Tourists and Recreationists” to describe people visiting Dachau or Auschwitz Death Camps in Europe). Please do not use that term in the final document.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS, and response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site. The visual impacts at Minidoka NHS are further discussed in the EIS Sections 3.5 (Cultural Resources) and 3.16 (Visual Resources), including daytime turbine visibility and nighttime lighting effects from the project. Use of an ADLS would minimize the amount of time that red turbine lighting would be lit at night, only turning on when an aircraft is detected by the system.
12136-4	Diane Honda	Per the DEIS definition, the impact of this project constitutes an irreversible commitment of Minidoka NHS’s viewshed resource as well of the land resources immediately surrounding the Minidoka NHS. DEIS verbiage should be updated to document that reality. Once wind towers (and transmission lines) are installed, they become permanent parts of the landscape and permanently change an area. While the DEIS includes verbiage about project decommissioning, my husband, who sits on the board of directors of a wind tower energy company, said wind towers are rarely, if ever, decommissioned. Instead, they are upgraded, likely becoming larger and even more visible over time. Wind towers would likely impact the Minidoka NHS viewshed in perpetuity if this project is approved. Decommissioning wind towers is not a likely scenario. Again, DEIS verbiage should be updated to document that reality.	The project is required to consider and plan for decommissioning. At this time there is no proposal for upgrading or replacing project elements in the future, and it can only be speculated upon. Should such a proposal become a future consideration, MVE would need to undergo new and separate permitting review for those upgrades, including likely renewed environmental review under NEPA. All current project developments, including project construction, operation, maintenance, and decommissioning must fit within the scope of review analyzed in the EIS; the BLM will not permit actions outside the scope of review for this project. As stated in the EIS in Sections 3.5 (Cultural Resources) and 3.16 (Visual Resources), the visual impacts from the project are considered to be long-term in duration.
12139-1	Jonathan Narita	My name is Jonathan Narita. During World War II, my grandparents and their families were torn away from their homes, businesses, and lives in Seattle and were imprisoned in Camp Minidoka. They lost everything. After the war, it took them decades to rebuild and restart their lives, but still, three generations later, our family has not healed from the trauma from being violated and forcibly incarcerated against their will by the State. My Grandfather, George Nakagawa, was only a teenager when he was held at Minidoka. Whenever the topic of Minidoka came up, I could hear the pain in his voice and see the bitterness in his eyes. He would never talk about it much. That is, until my older sister convinced him to join her on a pilgrimage to the site. Back at the site,	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns. See response to comment

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		amongst other survivors and their descendents, my sister watched him slowly open up. He shared with her memories and feelings that were unexpressed for decades, and my family was able to begin understanding, processing, and healing from these intergenerational emotional scars that we all feel but hadn't fully grasped. Minidoka is a place of great pain, suffering, and trauma for me and my family. But we have turned it into a sacred place of community, family, and healing. We are not tourists or recreationalists. To defile the viewshed and somber isolated ambience of the Minidoka National Historic Site with wind turbines would be to irreparably mar the visiting experience of the site, and would be to fail to protect the integrity of the site. I can't emphasize enough the amount of psychological harm that the wind project would have on my family and my community--it would be substantial. The push for renewable energy should not come at the expense of marginalized groups; and the expense here is vast; the expense is an impairment of resources. Wind turbines should not be visible from the historic footprint of Camp Minidoka.	12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site.
12159-5	Marie Matsuno, Dan Sakura	Traditional Cultural Property (TCP) description. I encourage the BLM to consider the impacts of the Lava Ridge project on the Minidoka Traditional Cultural Property (TCP), which has connections to Japanese Alaskan/Alaska Native families wrongfully incarcerated at Minidoka. The Minidoka TCP is connected to the cultural practices or beliefs of the living Japanese Alaskan community. It is rooted in our community's history and important in maintaining our continuing cultural identity. I agree with the TCP Report's findings Minidoka's "viewshed is an integral part of the visitor experience. Therefore, significant changes to this expansive, largely unobstructed viewshed would have negative consequences and adverse impacts to the integrity of the TCP."4	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. The BLM has addressed the TCP report in the final EIS at Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site). Also see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). The BLM remains in consultation with SHPO and other interested consulting parties on the treatment of Minidoka NHS and other historic properties under the NHPA Section 106 process (36 CFR 800) and has prepared a PA to complete that process and address adverse effects to historic properties (see EIS Appendix 8 [Cultural Resources Programmatic Agreement]).
12193-1	Bill Kawahara	I had returned to the Minidoka Concentration Camp several times and each time I have found that it had brought back many memories that were way back in my mind, almost forgotten. Some of these memories were sad and others were happy but they were brought back after seeing the Camp after many years. I strongly believe that by populating the surrounding area with these wind machines, would destroy the history of the place that was such an important part of the Japanese-American experience. By changing the environment so drastically, any lessons possibly learned by future generations would be lost without capturing the feelings of desolation, nothingness, abandonment that was so deeply felt by the internees. History is so important.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed at EIS Section 3.6.1 (Environmental Justice Communities). Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
12195-2	Taryn Dabb	If erected on Minidoka National Historic Site, the wind project would erase an important part of history that impacted the lives of many innocent Japanese American families, including my own. The 740 foot tall turbines on 73,000 acres would not only impede the view but negatively alter the memorial and land that incarcerated 13,000 people. It's not fair to pit a community of color against the need for clean energy. Were there proposals to put this wind project at Arlington National Cemetery or the Washington Monument? Why would it be okay to put a wind farm on a piece of land that is so sacred to the Japanese American community? There has to be a more respectful place for this project! I am yonsei, a fourth generation American with Japanese heritage. Both of my paternal grandparents and their families were incarcerated at Minidoka. My grandpa left Minidoka to fight in the 442nd combat unit and came home with two Purple Hearts, a Bronze Star, a Presidential Unit Citation, a Combat Infantry Recognition Award and an Army Good Conduct Medal. The 442nd infantry regiment remains the most decorated unit in history. After reading the book Facing The Mountain by Daniel James Brown, I learned about what my grandpa would not speak of about his time fighting during the war. The brave Japanese American men were heroes who fought for a country who imprisoned their families because they looked like the enemy. Even though he was a war hero, my grandpa came home to discrimination, racism, disrespect and prejudice. Many Japanese Americans lost everything after coming home from being incarcerated. My grandparents had to work hard to rebuild their lives yet they were still not welcome in many communities. They weren't allowed to live in certain neighborhoods or belong to certain clubs because of their heritage. My grandparents didn't talk about their struggles but rather focused on establishing a better future for their family. There were bumps in the road and racial issues to overcome that my parents have shared with me but a lot has gone unsaid because it was not proper to complain about the past. My family wanted the younger generation to live in a better world than they did. The fact that I am still being 'othered' in my own community in the year 2023 tells me that the United States still has a long way to go with how it views race. Being asked when I arrived in the US, where I'm from, or where I learned English is a slap in the face. I belong here. My family belongs here. We have been in this country since the early 1900s yet people still treat me like I don't belong. My family has worked hard for everything we have but we still have to prove how American we are. History books in my schools briefly mentioned the imprisonment of Japanese Americans. There were never more than a few paragraphs describing the mistreatment of Japanese Americans. I started researching the truth about the incarcerations on my own and was finally able to see the extent of the emotional, physical, and generational impact the incarceration had on me and my family. For the Bureau of Land Management to take away a painful yet important piece of my family's history is unfathomable. It appears that the US is trying to bury a part of its history that it doesn't want the world or future generations to know the truth about. Information has been purposely left out of school books to make the United States look good. The Minidoka National Historic Site is a reminder of a mistake in the United States' history and putting up a wind farm won't erase the fact that it happened. It's a sacred place where descendents of imprisoned Japanese	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. No portion of the project would be constructed at Minidoka NHS. See response to comment 1395-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding project siting questions. Adverse project impacts to Minidoka NHS are considered at EIS Section 3.5 (Cultural Resources). Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and BLM's development of the Preferred Alternative. Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed at EIS Section 3.6.1 (Environmental Justice Communities). Mitigation of impacts that are not fully avoided or further minimizable are also addressed in the above-referenced EIS sections.

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		Americans can pay their respects. It's also a place where people from any race can learn about the incarceration and lay their eyes on land where Japanese Americans were imprisoned. I haven't made it to the Minidoka National Historic Site yet but I hope to do the Minidoka Pilgrimage someday. I hope that when I get to see the place my grandparents were imprisoned, there aren't wind turbines as far as the eye can see. It's a sacred place that I want to take my two young boys to when they're old enough to understand the atrocities that happened to their family because they looked like the enemy. I want them to understand their ancestors' strength and perseverance despite suffering behind barbed wire fences, living in harsh climate and living conditions, and having their food rationed. Having wind turbines as far as the eye can see will take away from the impact that the hallowed ground represents.	
12241-1	Joe Abo	I am a former incarceree of the Tule Lake, WWII relocation camp in northern California. When our family was released from camp in 1946 I was five years old. The Tulelake area when we last visited several years ago was much like it was during WWII. However now an airfield has been proposed to cover a portion of the former camp thus desecrating what is considered hallowed ground for many incarcerees such as myself and is being fought against as many Japanese Americans are fighting against the Lava Ridge Wind Project in Idaho. It seems that government and others are forgetting what injustices have been done to minorities, in this case Japanese Americans, because of racial prejudice. If actions such as those occurring at Minidoka and Tule Lake are allowed to be completed the memories of these wrongful acts will be forgotten. This cannot be allowed to happen as we must learn from the mistakes of the past however shameful they may be. I have been to pilgrimages at Minidoka and Tule Lake and can only imagine what it must have been like for the incarcerees in 1942 arriving in a high desert landscape with blowing dust, surrounded by sagebrush, staring at their new homes, barracks, made of unpainted shiplap covered with tar paper. Other former incarcerees have expressed what a sensory experience it was to see the landscape and an old barrack of the war years on their pilgrimages. Also to show their descendants and friends that the camps really had existed and what it had been like.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed at EIS Section 3.6.1 (Environmental Justice Communities). Mitigation of impacts that are not fully avoided or further minimizable are also addressed in the above-referenced EIS sections. The final EIS includes new Section 3.19 (Minidoka National Historic Site Interpretive Purpose), where impacts identified within EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources) are assessed in terms of how these would impact the interpretive purpose of Minidoka NHS.
12261-1	Kayo Natalie Hayashida Ong	I am a survivor of 2-1/2 years behind barbed wire fences at Minidoka. It's a solemn place - a reminder of war hysteria, prejudice and hardship suffered by my family because my immigrant grandparents were born in Japan. Leaving home on Bainbridge Island, WA, and transplanted to southern Idaho we faced a desolate land - treeless, dusty and void of all but packed earth and rows of tar papered barracks. Return trips as an adult remind me that this is a unique place in our Country's history. The quiet, open spaces, dotted by a few restored buildings under open skies, allow for reflection and tears. Why? Why? Why would the BLM permit a monstrous wind farm to pollute the sky and disrupt the quietude so near to this special place to those of us of Japanese descent who worked to bring life to this land? Are we less worthy of our rights as in 1942? Why? Why would the BLM allow the constant 'whoop' 'whoop' noise of the turning arms pollute the quiet? Why choose this flat land when the wind would be more efficient on higher ground? Would a massive wind farm be considered for the Black Hills? for Yellowstone? or other place set aside for future generation to reflect on the history and import of these places? You are charged to consider the impact and lasting importance of your decision. There are several alternatives balancing economics and conservation away from this historic site. The Minidoka National Historic Site needs your decision to preserve this area as a solemn, reflective place for future generations.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 1395-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding project siting questions. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, reducing noise, and avoiding physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
12272-1	Carrie Schwitters	I'm writing to ask that you locate the wind turbines far enough away from Minidoka, that others will have the same experience that we had. Minidoka is a reminder of an human event that the American government got wrong. Let's not add to that wrong by devaluing the human experience that occurred at Minidoka. The Japanese American community should be heard. Please listen to their request to have the turbines located further away.	See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM's development of the Preferred Alternative. Also see Section 3.19 (Minidoka National Historic Site Interpretive Purpose), newly added to the final EIS.
12299-2	Lori Saginaw	I urge you to consider that two generations of my family were imprisoned at this Minidoka Concentration Camp during World War II, forced to leave their livelihoods, homes, and college education in Seattle, Washington, a trauma that altered the paths of their lives forever after. Even though I did not experience this terrible round up and confinement myself, the trauma of it exists in my DNA and in that of my sons. Much research shines light on the reality of intergenerational trauma and all of its manifestations. Academicians (e.g.Nagata, D.K., Kim, J.H.J, & Wu, K. 2019 and Nagata, D.K. & Patel, R.A. 2021) document the legacy of trauma in second, third and now fourth generation Japanese Americans as a result of the incarceration. Pilgrimages to all ten of the concentration camp sites are conducted as part of a healing process. A massive wind farm surrounding Minidoka would make the experience of my ancestors inaccessible. Such an alteration to the site as it currently exists dishonors the past and compounds the injustice of the past. Its barren and remote setting defines its historic truth and that truth is respected by preserving this reality. This is why the Lava Ridge Wind Project would have catastrophic and detrimental impact. Its massive presence and disruption of the landscape would undermine the significance of and reason for the site's preservation. Two-thirds of the over 125,000 incarcerees were American citizens by birth. Such egregious and unconstitutional treatment on the part of this country's leadership cannot go unnoted, unstudied, or unscrutinized. There is an essential context that the landscape surrounding this National Historic Site provides in order to grasp a full understanding of the unjust experience of these children, women and men. Every American and especially those like me who are directly connected to this dark past need to see the landscape as it was, emptiness stretching as far as the eye can see, in order to begin to comprehend the weight and magnitude of their isolation. In order to stand in their shoes. This cannot be done if sitting on top of the largest wind farm in the United States, 400 wind turbines spanning 197,474 acres in full view from the Minidoka Historical Site. Such a display would irrevocably harm the viewshed. In DEIS terminology, it would be a gross	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities, and associated EIS revisions that have been made to address these concerns. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the potential impacts of the project on Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose). Please note that project turbines would not surround Minidoka NHS but would rather be located from north to east, varying depending on the project alternative. Please note further that, while the project represents a large-scale commercial wind energy development, the number of turbines proposed will not make it among the largest wind farms in the United States.

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		impairment of resources. It would contradict the very history that is protected by its designation as an historical site. How can any visitor imagine the incarcees' experience without open views of desert and mountains? The Minidoka Historical Site must be preserved intact to properly commemorate, so that there can be healing from the history of the incarceration. As it exists, it is an essential resource to further public education in order to protect civil and constitutional rights in America. I emphasize that there is no alternative in the DEIS in which wind turbines (up to 740 feet tall) would not be visible from the MHS visitor center. Even Alternative E, with "the least number of visual impacts to the historic site", would be too massive, spanning 122,444 acres with 269 wind turbines. Any change to the landscape undermines the integrity of the Minidoka Historic Site (MHS) as a cultural, educational, and historic resource and irreparably alters the environmental setting of this WWII American concentration camp. The integrity of the viewshed is the determinant of the integrity of this historic marker of our history.	
12308-1	Alice Hikido	I am a 90 year old survivor of Minidoka, taken from my home in Juneau, Alaska when I was a child of nine. I remained there with my family without my father who was detained in a justice department camp in Santa Fe, New Mexico until the war ended and I was almost thirteen. Minidoka was a barren, dusty landscape so foreign to me who longed for the beautiful coastal mountains of Alaska. For many of the years following, I wanted to block out the experience of Minidoka from my psyche as it was a painful memory of captivity. You have heard many descriptions of the camp situation from others, so I feel that I don't need to again elaborate them for you. With the ending of the war, my father, mother, my young sister and I returned to our home in Juneau without my brothers, one was serving with the 442nd RCT in Europe. We picked up the broken pieces of our lives turning our backs on the memories of Minidoka. I later learned about the pilgrimages to Minidoka from my younger sister who was two at the time of our incarceration. She, of course, was too young to have any memory of Minidoka and now in her 70's, was curious to know where she spent her early years. She asked me to attend a pilgrimage with her, but returning to Minidoka was the last thing I ever wanted to do. However with her encouragement I reluctantly returned with her, wary of the memories I kept submerged. The experience of the pilgrimage was surprising. It turned out to be a healing time for me as I was able to let go of the memories keeping me captive as I shared the experience with other pilgrims. I now realized the importance of the site for all who were incarcerated there and also the importance that it carried for descendants. Not only that, but also for citizens of our nation to know that mistakes are made but are not to be forgotten. The Lava Ridge Project, as proposed with 400 wind turbines, over 700 feet tall within the view shed of Minidoka would have a tremendous negative visual and auditory impact upon the Minidoka National Historic Site, diminishing the powerful message Minidoka conveys. Family members who have attended the monthly Section 106 meetings continued to keep me informed. I volunteered to be interviewed by the Langsdon Group commissioned by BLM which is included in the Draft Environmental Impact Statement. I also volunteered to be a Consulting Party for the Programmatic Agreement. There are fewer and fewer survivors still living.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the potential impacts of the project on Minidoka NHS and the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
12323-1	Sharon Yorita	>From 1942 - 1945, approximately 13,000 Japanese Americans were imprisoned at Minidoka with armed military in guard towers to make certain they could not escape. The majority American citizens. You call us "tourists." Our "tourist" accommodations were one room, tar-papered barracks. A single light bulb, cots for beds and a pot bellied stove for bone-chilling winters. Dust storms were the norm. If these barracks were considered tourist hotel rooms, I would have certainly asked for my money back. We "tourists" also shared community toilets and showers. Our restaurants were mess halls where we could stand in long lines to feast on baked beans and sausages. It's now 2023, and you the Bureau of Land Management want to honor our sacrifice by building LavaRidge. We SURVIVORS of MINIDOKA say "NO" to LavaRidge. We've sacrificed enough. Respect how we have served our country of America.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. Please note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS.
12343-1	Craig Murakami	It will significantly impact the Minidoka National Historic site and desecrate this monument. My parents and extended family were unjustly interned at this site and we grew up hearing many stories about their hardship and the desolate location of Minidoka. I have returned to this site with family and have witnessed the work being done by the National Park Department. This site will remind America about the the unjust incarceration of American citizens due to ignorance, fear, and racism and why it should never be repeated. My father, Kazuo Murakami, was a true American patriot who was interned at Tule Lake and Minidoka despite being an active member of the the Army Air Corp stationed in Arizona. Apparently, he was not East enough to avoid internment, and was reclassified as an enemy alien and sent to internment in his American Aircorp uniform. Until the day he passed away, he expressed how it was one of the saddest days of his life. Visitors and descendants can now begin to feel his saddest and dejection when visiting this isolated and sacred location in Minidoka. Despite this indignation, he de-enlisted from the Aircorp and enlisted into the 442nd infantry and fought in Italy and France. I have visited some of these European battlefields and have seen how Europe has preserved these sites to remind those that follow, the significance of these locations. Please do not allow the Lava Ridge project to proceed as it will visually and audibly effect the Minidoka National Historical site.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the potential impacts of the project on Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
12369-1	Wendy Watanabe	I am a 69-year-old third generation Japanese American, a descendent of family members who survived being imprisoned at Minidoka during WWII. Contrary to the term relocation center, my father, his sister, and their parents did not "relocate" but were involuntarily evacuated from their home in Seattle, Washington and incarcerated at what is now the Minidoka National Historic Site. Minidoka was one of the ten WW II concentration camps purposefully sited in remote areas of desert or swampland. My family, among the 125,000 people of Japanese ancestry who were forcibly removed to live behind barbed wire and guard towers, suffered from the grave injustice and unconstitutional violation of their rights. The profound impact of that trauma continues to felt	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community

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		by me, subsequent generations of my family, and the Japanese American community. Research studies (e.g., Nagata, D.K., Kim, J.H.J, & Wu, K. 2019 and Nagata, D.K. & Patel, R.A. 2021) document the legacy of generational trauma in second, third and now fourth generation Japanese Americans as a result of the incarceration. Which is why a trip to Minidoka is a sacred journey. Being able to make a pilgrimage to Minidoka is part of an ongoing healing process. Immersed in its vast stretch of desolate landscape, we can reflect on the isolation that our family and our community must have felt. Their experience is made more real by being there. To characterize the Minidoka Historical Site as a place for tourists and recreationalists is to hide the significance of this site and compound the injustice of the past. Minidoka, like the other American concentration camps, was specifically chosen for its remoteness and undesirable topography. For my family members and 13,000 others who were incarcerated there, Minidoka was an empty desert stretching as far as the eye could see. The enormity of siting the largest wind farm in the United States, 400 wind turbines spanning 197,474 acres in full view of the Minidoka Historical Site, would irrevocably harm the viewshed, or in DEIS terminology, be an impairment of resources. The immersive feeling of isolation, protected at other National Parks, would be destroyed. The land around the Minidoka Historical Site is not simply empty land to be developed, no matter how useful the purpose. The open views of desert and mountains are fundamental to a visitor's experience and understanding of what it was like for people at Minidoka. The Minidoka Historical Site allows for commemoration of and healing from the history of the incarceration, and serves as an essential resource for furthering public education and involvement and understanding of the need to protect civil and constitutional rights in America.	and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. Please note further that, while the project represents a large-scale commercial wind energy development, the number of turbines proposed will not make it among the largest wind farms in the United States.
12476-1	Rebecca Kenison	Minidoka offers the opportunity for education for all of us on the historical unjust incarceration that occurred there. To those who did not have families who were incarcerated there, it provides an important opportunity to learn and, hopefully, to grow in knowledge and wisdom. DEIS does not include the importance of that education.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
12538-2	Clarke Kido	Comments on Key Observations Points (KOPs) · I examined the simulation of the wind turbines at the Minidoka visitor center (KOP 1). I was greatly disturbed to find that the turbine corridor totally engulfs the visitor center and surrounding vista. If the Lava Ridge Project is approved and built, my physical and emotional experiences at the Minidoka Site will be irreversibly damaged. · When I look at the simulation photos with the Minidoka honor roll (KOP 16), I am offended by the presence of the wind turbines, regardless of proximity. During previous visits to the honor roll, I located my father's name and remembered his bravery and sacrifices. Sometimes I shared stories with others who were likewise studying the honor roll. If the project is approved, I will not be able to experience the quiet solitude and respect for family.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the potential impacts of the project on Minidoka NHS. None of the project turbine corridors would be at Minidoka NHS under any project alternative. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and BLM's development of the Preferred Alternative. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
12559-1	Tammy Duncan	I am writing in opposition to the Lava Ridge Wind Project EIS. While I myself do not have family that was directly incarcerated at Minidoka, my friends, their families and grandparents and the legacy of American citizens of Japanese heritage have been greatly impacted and affected by the mass incarceration of American citizens during World War II at this site. This is an important historical site, It is an essential part of the American story that must be be maintained in it's authenticity (which means, without the disrruption of the wind farm) so we can learn from our own mistakes and acknowledge our own history, but also so that the families of survivors can continue to heal, reflect and connect on this land. The solmness and isloation of the landscape is part of the experiene at Minidoka that must be maintained. Forcable moving people from the safety, comfort and resources of their communities to this desolate landscale, is an essential part of the crime that we must bear witness to. The minimal and solemn "viewshed" must not be altered, as it is an essential part of history. The wind project and it's impact statement has completely ignored the cultural signifcance of Minidoka. Families of survivors that visit this location and underake this pilgraimage are not tourists. It is not recreation nor a fun family picnic. The implication in the DEIS that the visitors to this site are simply recereational tourists is an ignorant insult meant to obsure the signiicance of this location. Visitors to this site are seeking a connection to their past, to educate, to commune and to heal as a population of our American commnity that was directly effected by our own racism, and fear during world war II.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
12671-1	Sarah Suzuki	I am writing to comment on the proposed Lava Ridge Wind Project and its potential impacts on the Minidoka National Historic Site. As a fourth-generation Yonsei Asian American, the preservation of this site holds deep personal and historical significance for me, my family, and many others. Visiting the site allows me to honor my incarcerated relatives' memory, better understand their challenges during World War II, and connect with the broader narrative of Japanese American internment. Minidoka National Historic Site is a critical educational resource for understanding the complex history of Japanese American internment during World War II. It is a powerful reminder of preserving civil liberties and human rights (Nagata & Patel, 2021)[1]. The landscape's features, such as the remains of historical structures and natural elements like vegetation, contribute to the site's overall historical significance and emotional impact (Tufts Now, 2021)[2]. The proposed Lava Ridge Wind Project could have significant visual and emotional impacts on the Minidoka site. The presence of wind turbines	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities, and associated EIS revisions that have been made to address these concerns. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War

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		would disrupt the site's remote and immersive setting, altering its character and undermining its historical and educational value. This would diminish my ability to connect with my family's history and hinder the healing process for survivors, descendants, and the American population. The DEIS for the Lava Ridge Wind Project needs to include several crucial aspects in its analysis, such as the importance of preserving the site's cultural landscape, the potential adverse psychological effects of incarceration at Minidoka (APA PsycBooks, 2021)[3], and the inappropriateness of identifying Minidoka NHS as "Tourists and recreationists." The impact on the site's "viewshed" is another concern. The wind turbines would be visible from various locations within the area, disrupting the visitor experience and the site's historical context. The DEIS states a "moderate" degree of visual change to Minidoka NHS's viewshed, which is insufficient to protect the integrity of the site (DEIS, Lava Ridge Wind Project)[3]. I recommend that the BLM thoroughly re-evaluate the proposed project in light of these concerns and consider modifications or alternative solutions that respect Minidoka's cultural, historical, and psychological significance.	Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS's address of impacts to the natural and cultural landscape surrounding the site. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose). Also see responses to comments 12859-21 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding potential psychological effects. The BLM has revised the visual sensitivity for Minidoka NHS and surrounding WRC to be high sensitivity, instead of moderate; see EIS Section 3.16 (Visual Resources). However, the degree of visual contrast for wind turbines will remain moderate based on visual contrast rating analyses in Section 3.16.
12859-7	Kristen Brengel, Robyn Achilles; Friends of Minidoka	FOM commissioned a TCP report and ethnographic survey. Based on interviews, oral histories, NPS planning documents, BLM analysis and extensive documentary evidence, the report concluded that the Minidoka is eligible for listing on the National Register of Historic Place as Traditional Cultural Property.32 Traditional cultural property is: … significant because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998:1). TCPs draw upon a community's traditions, defined as the …beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices (Parker and King 1998:2). The report also includes GIS mapping and viewshed analysis to define the approximate TCP boundary.34 To determine eligibility, a traditional cultural landscape must meet four requirements: (1) tangible property, (2) integrity; (3) National Register of Historic Places Criteria; and (4) not be ineligible. • Tangible Property. "Minidoka is a geographically definable area that encompasses and is largely defined by the concentration of interrelated and linked buildings, sites, and viewshed surrounding the national monument." Integrity. The TCP Report finds that the Minidoka's TCP meets the integrity elements:36 o Relationship -- Feeling and Association. § Feeling. The TCP report found that the Minidoka TCP: "embodies and evokes this sense of the historic era both through the historic barracks and other buildings as well as through the expansive viewshed, serving to evoke feelings of isolation and remoteness that are a major part of the property…"37 § Association. The TCP report found that the TCP meets the association requirement: "… there is a clear continuation of association with the property evidenced through the annual return of Minidoka incarceree descendants to commemorate and memorialize those imprisoned there, [and] to the various events held at Minidoka…"38 o Condition -- Location, Design, Setting, Materials, and Workmanship. The report found that even with modern intrusions in the traditional cultural landscape, the TCP meets the condition test: "…the integrity of condition remains strong enough and intact enough to convey its historical narrative and the experience of the incarcerees. Even though there are now nearby farmlands, the expansive, unobstructed viewshed still conveys this sense of isolation and remoteness, an important aspect to the historic integrity of Minidoka."39 The report found that Minidoka also meets the condition requirements for location, design, setting, materials and workmanship.40 • National Register of Historic Places Criteria. To be determined eligible for listing, a property needs to meet at least one of four National Register criteria defined in regulations.41 The report found that the TCP meets all four Criteria A, B, C and D: o Criterion A: Association with events that have made a significant contribution to the broad patterns of our history. The Minidoka TCP "is directly associated with events that have had a major impact within American history. The forcible relocation and imprisonment of thousands of first and second-generation Japanese Americans [and Japanese Alaskans] at Minidoka (and the other WWII concentration camps) impacted the lives of countless Japanese Americans and continues to impact their lives today. Their story, one that continues to be told and further contextualized today, is a significant contribution to the broad patterns of American history."42 This finding is supported by numerous NPS findings relating to National Historic Landmark (NHL) designations of similar incarceration sites at Amache, Manzanar, Rohwer, Tule Lake, Heart Mountain, Topaz and Poston.43 The NHL designation represents a determination of national significance.44 The NPS has determined that Minidoka is "nationally significant." o Criterion B: Association with the lives of persons significant in our past. The Minidoka TCP "…is associated with the lives of multiple historically significant people, many of whom were heavily influenced by their experiences at the Minidoka concentration camp."46 While there is not space here to highlight all the lives of persons significant in our past associated with Minidoka, one person significant in our past is George Nakashima, the internationally acclaimed woodworker and furniture maker. In its National Historic Landmark nomination package for his home and workshop in New Hope, Pennsylvania, the NPS noted that "George Nakashima is one of America's most eminent furniture designer-craftsmen and a significant force within the American Craft movement of the mid-twentieth century, a seminal period for woodworking in the United States."47 National Register Bulletin 15 provides guidance to applying Criterion B regarding a person's association with a property, with a focus on the "person's productive life, reflecting the time period when he or she achieved significance." NPS described Nakashima's productive life while incarcerated at Minidoka: "The Nakashimas, including their newborn daughter Mira, were relocated to Camp Minidoka in Idaho. In George Nakashima's autobiography The Soul of a Tree, he describes the mass incarceration in the internment camps as 'a stupid and insensitive act, one by which my country could only hurt itself. It was a policy of unthinking racism.' Despite the horrendous circumstances, Nakashima made the best of his situation. As luck would have it, Japanese carpenter Gentaro Hikogawa was	See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics). For clarification, the Minidoka property is a National Historic Site, not a National Historic Landmark as stated in the comment. The BLM remains in consultation with SHPO and other interested consulting parties on the treatment of historic properties under the NHPA Section 106 process (36 CFR 800) and has prepared a PA to complete that process and address adverse effects to historic properties (see EIS Appendix 8 [Cultural Resources Programmatic Agreement]).

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		also incarcerated at the camp; Hikogawa was well-trained in the use of traditional Japanese hand tools and had an intimate knowledge of Japanese wood joinery. Hikogawa taught his skills to Nakashima, thus enhancing Nakashima's already considerable furniture making ability. They used scraps of wood and bitter-brush scavenged from the desert to make pieces of furniture that could enhance their primitive living conditions. While Nakashima claimed to bear no scars from the interment experience, it certainly strengthened his beliefs. As Mira explains, 'Fortunately, he was able to transform anger and negativity into the positive passion of conviction, the passionate creativity of his work, and the passion for beauty and perfection, which served him well.' Rather than building animosity because of his heritage, Mira points out that 'My father's insistence that he was a citizen of the world not limited by national or racial boundaries, enabled him to rise above prejudice and persecution, to embrace, rather than reject the Japanese culture and aesthetics as few, if any, of his fellow internees dared.'"48 o Criterion C. Represents a Significant and Distinguishable Entity. According to the TCP report, "the Minidoka TCP is a district with multiple important, character-defining components: the Minidoka national monument itself, but also the surrounding viewsheds defined by the rolling hills of sagebrush, the many rock outcrops, the peaks, and other elements that compose and characterize the sagebrush steppe landscape." Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history. According to the TCP report, "[e]thnographic and archaeological studies have yielded information important to the history of the area. Future studies of the area will likely yield more information about the significance of both the Minidoka National Historic Site specifically, and the surrounding area generally."50 • Ineligibility Analysis. The TCP report found that the Minidoka TCP "does not fall under any of the ineligibility criteria and is therefore recommended to be eligible under criteria (a), (b), (c), and (d) as listed above."51 The Friends of Minidoka submitted the Traditional Cultural Property report to the Idaho SHPO. In February 2023, the SHPO determined that the area is TCP eligible based on meeting Criterion A. National Register eligibility is determined pursuant to 36 CFR § 800.4(c)(2) of the Advisory Council on Historic Preservation's Section 106 regulations52 as well as 36 CFR § 63.53 The eligibility determination is the responsibility of the lead federal agency, in this case, the BLM, often in coordination with the SHPO. The BLM's Monument RMP states that "[i]f properties that may be eligible for the National Register are discovered, the BLM will consult with the State Historic Preservation Officer (SHPO) and forward the documentation to the Keeper of the National Register to obtain a determination of eligibility in accordance with 36 CFR Part 63."	
12859-8	Kristen Brengel, Robyn Achilles; Friends of Minidoka	We also cite these authorities to provide a more complete list of laws, Executive Orders, Administration statements, policies and directives that relate to Minidoka and request that they be added to the FEIS. National Environment Policy Act (1969): In addition to its procedural requirements, NEPA includes substantive requirements via a congressional declaration of National Environmental Policy to: "…create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."63 NEPA also includes substantive requirements relating to historic resources and scenery: "it is the continuing responsibility of the Federal Government to use all practicable means … [to] preserve important historic, cultural and natural aspects of our national heritage"64 and "assure for all Americans … esthetically and cultural pleasing surroundings."65 The Monument RMP cites NEPA's substantive authority as requiring BLM to "identify, evaluate, and protect cultural resources on public lands under its jurisdiction and to ensure the Bureau-initiated or Bureau-authorized actions do not inadvertently harm or destroy non-federal cultural resources."66 NEPA's substantive requirement to preserve historic sites was further clarified by Executive Order 11593, entitled "Protection and enhancement of the cultural environment," which was incorporated into the Monument RMP and therefore guides BLM management decisions.67 Executive Order 11593 establishes a federal policy that "[t]he Federal Government shall provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation. Agencies of the executive branch of the Government (hereinafter referred to as "Federal agencies") shall (1) administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations, (2) initiate measures necessary to direct their policies, plans and programs in such a way that federally owned sites, structures, and objects of historical, architectural or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the people…" 68 Preserve America Executive Order 13287 (2003). The Preserve America Executive Order states that it is federal policy to "provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government … and fostering a broader appreciation for the development of the United States and its underlying values … executive branch departments and agencies (''agency'' or ''agencies'') shall advance this policy through the protection and continued use of the historic properties owned by the Federal Government."69 Environmental Justice EO 12898 (1994) – Achieving environmental justice. Executive Order 12898 states that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations …."70 Emphasis added. Anti-discrimination provisions. In addition to the affirmative mandate to promote environmental justice, the Environmental Justice EO directs federal agencies to manage their programs so that they do not have the effect of "…subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin."71 Advancing Racial Justice Executive Order (E.O. 13895). On January 20, 2021, President Biden signed a "Day One" Executive Order entitled "Advancing Racial Equity and Support for Underserved Communities through the Federal Government." EO 13895 states that "[a]ffirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government."72 The EO states that underserved communities who have been	The EIS meets NEPA requirements for the project. See response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics), in general. The EIS is in conformance with the BLM SFO's 1986 monument RMP (BLM 1986), the land management plan for the analysis area, and EO 11593 is incorporated into the plan. EO 11593 (issued in 1971) and EO 13287 (issued in 2003) are further complied with by following the current stipulations and guiding regulations of the NHPA, as amended, and as cited in the EIS and as is being done by the BLM. EIS Section 3.16 (Environmental Justice and Socioeconomics) specifically addresses the policy of EO 12898 as carried out by the BLM under the current NEPA regulations and as updated under EO 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All). See also the CEQ (1997) citation, Environmental Justice Guidance Under the National Environmental Policy Act, in the Environmental Justice and Socioeconomics section of the Literature Cited section in EIS Appendix 10. EIS Section 3.6 sufficiently considers impacts related to environmental justice concerns, as expressed under EO 14008 (Tackling the Climate Crisis at Home and Abroad [2021] and EO 14057 (Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability). The BLM is proceeding consistent with agency mission, governing law, and applicable preservation standards, including EO 13287 (Preserve America) and EO 14091 (Advancing Racial Justice Executive Order). It should be noted that these orders (and the memorandum cited below) are intended only to improve the internal management of the federal government and not intended to, and do not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, as each EO and the memorandum below state. Regarding the Presidential Memorandum Condemning and Combating Racism, Xenophobia, and Intolerance Against Asian Americans and Pacific Islanders in the United States (January 26, 2021), the BLM has taken action to ensure that official actions, documents, and statements do not exhibit or contribute to racism, xenophobia, and intolerance against Asian Americans and Pacific Islanders. See also the BLM's response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions to accurately represent the Japanese American community and Japanese and Alaska Natives. Regarding the consideration of an ACEC surrounding Minidoka NHS, as may relate to furthering the objectives of EO 14031 (Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders), see the BLM's response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) on the BLM evaluating the proposed ACEC designation through a separate process outside of the project (see final EIS Appendix 13 [Preliminary Evaluations of Potential Areas of Critical Environmental Concern]). Please note that the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS; also see responses to comments 9275-5 (see in Table A-3ee, Alternatives) and 11535-7 (see in Table A-3ee, Alternatives). Proclamation 10341 (February 2022: Day of Remembrance of Japanese American Incarceration During World War II) is specifically cited in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site); however, please also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to the EIS. Please note that the BLM has not included reference to all of the laws, regulations, orders, or memorandum it follows in the EIS, nor is that necessary; per the NEPA regulations at 40 CFR 1502.2(a), an EIS shall not be encyclopedic.

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		denied “fair, just, and impartial treatment” include “Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color.”73 To implement the Racial Justice EO, Secretary Haaland highlighted President Biden’s Fiscal Year 2022 budget request to Congress which included funding increases for National Parks, including Minidoka NHS, that tell the stories of underrepresented communities. Presidential Memorandum Condemning and Combating Racism, Xenophobia, and Intolerance Against Asian Americans and Pacific Islanders in the United States. On January 26, 2021, President Biden sent a memorandum to federal actions directing that ““[e]xecutive departments and agencies (agencies) shall take all appropriate steps to ensure that official actions, documents, and statements, including those that pertain to the COVID-19 pandemic, do not exhibit or contribute to racism, xenophobia, and intolerance against Asian Americans and Pacific Islanders.”83 By impairing Minidoka’s values, approval of Alternatives C and E would run counter to this guidance. Executive Order on Tackling the Climate Crisis at Home and Abroad-- Environmental Justice. While the Administration’s Climate Crisis EO (#14008) establishes nationwide goals for renewable energy, it also requires that the response to climate change delivers environmental justice, not come at the expense of the environmental justice.84 Executive Order 14057, on “Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability,” also includes environmental equity requirements: “[e]nvironmental justice can only be achieved by ensuring that all those affected by agency operations enjoy the same degree of protection from environmental and health hazards.” Executive Order on Advancing Equity, Justice and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islands.86 On May 28, 2021, President Biden signed Executive Order 14031 to establish the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders (AANHPI).87 The E.O. directed the Initiative to “advance equity, justice, and opportunity for AA and NHPI communities by coordinating Federal interagency policymaking and program development efforts to eliminate barriers to equity, justice, and opportunity faced by AA and NHPI communities, including by advancing policies, programs, and initiatives.” Approval of the ACEC and rejection of the Lava Ridge proposal would further the E.O.’s direction to: “promote inclusion and belonging for AA and NHPI communities, including by expanding public education and knowledge of AA and NHPI people and their diverse cultures, languages, and histories.” In January 2023, DOI issued a fact sheet which stated: “[p]er Executive Order 14031, DOI has identified five high-priority goals that will span the next two years. These goals will advance equity, justice, and opportunity for AA and NHPI communities … GOAL 4 Promote equity and inclusion by ensuring the history of AA and NHPIs is part of America’s storytelling.”93 Approval of the ACEC would demonstrate DOI’s commitment to ensure that AANHPI history is part of America’s storytelling. Presidential Proclamation “Day of Remembrance of Japanese American Incarceration During World War II, February 18, 2022:” To mark the 80th anniversary of the signing of E.O. 9066, President Biden noted that: “the National Park Service helps preserve several Japanese American incarceration camps. These tangible reminders of our history provide important spaces for reflection and learning about the injustices born of prejudice. Preserving incarceration sites as national parks and historic landmarks is proof of our Nation’s commitment to facing the wrongs of our past, to healing the pain still felt by survivors and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations and to combating xenophobia, hate, and intolerance — including through the reestablished White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders. In the words of Dr. Frank Kitamoto, who was incarcerated as a child, ‘This is not just a Japanese American story but an American story with implications for the world.’”	
12859-19	Kristen Brengel, Robyn Achilles; Friends of Minidoka	3.5.3 Minidoka War Relocation Center and Minidoka National Historic Site P. 3-155 – While the BLM’s 2022 Stakeholder Assessment and Engagement Report summarizes the effects of the proposal on the Japanese American community, it only scratches the surface of the social and health impacts it would have on our community. Our comments on Section 3.6 address this issue further. P. 3-156 – As noted in our comments above, please include the following authorities in this section: Japanese American National Historic Landmark Theme Study Act of 1992.171 The P.L. 102-248 directed the Secretary of the Interior to prepare a National Historic Landmark (NHL) Theme Study “to identify the key sites in Japanese American history that illustrate the period in American history when personal justice was denied Japanese Americans” and directed the Secretary to study Minidoka and other sites. Norman Y. Mineta Japanese American Confinement Education (JACE) Act. In 2022, Congress passed the JACE Act (P.L. 117-328) to “provide competitive grants for the promotion of Japanese American confinement education as a means to understand the importance of democratic principles, use and abuse of power, and to raise awareness about the importance of cultural tolerance toward Japanese Americans, and for other purposes.” The law reauthorized the JACS grant program which includes Minidoka NHS as an eligible confinement site. Supplemental Appropriations Act, 2010. Section 2003 of P.L. 111-212 authorized the Secretary to realign the SWIP-N ROW to the west of the Minidoka NHS to protect the park from the direct effects of the power line. This legislation demonstrates Congressional support for Minidoka. Executive Order 13985 “Advancing Racial Equity and Support for Underserved Communities through the Federal Government,” dated January 20, 2021, and as furthered by a February 2023 EO. “Presidential Memorandum Condemning and Combating Racism, Xenophobia, and Intolerance Against Asian Americans and Pacific Islanders in the United States,” dated January 26, 2021.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to the final EIS. That section reviews thematic concepts identified in NPS planning for Minidoka NHS preservation. Also see response to comment 12859-8 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding citation of laws, orders, and similar authorities. Also see response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics), in general. The BLM further records this input on these authorities here with the comments received.
12859-20	Kristen Brengel, Robyn Achilles; Friends of Minidoka	3.6.2.1.2 Dispersed Environmental Justice Populations The DEIS does not adequately describe the Japanese American Community, the impacts and effectiveness of mitigation measures. Rather than a “hard look” at the impacts of the Alternatives on the Japanese American community, the DEIS provides a very cursory analysis of impacts on our community. The Council on Environmental Quality NEPA regulations require that the human environment “shall be interpreted comprehensively to include the natural and physical environment and the	The affected environment presented in EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) for the Minidoka WRC and NHS includes a description of the forced removal and incarceration of Japanese immigrants and Japanese Americans during WWII. Section 3.5.2 also incorporates by reference additional documents, such as the Minidoka National Monument General Management Plan, the Minidoka NHS foundation document, and the Lava Ridge Stakeholder Assessment and Engagement Report,

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		relationship of people with that environment."173 The NEPA regulations also state that "[w]hen an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." No baseline condition regarding the Japanese American Community. NEPA requires a baseline condition.175 "Establishing appropriate baseline conditions is critical to any NEPA analysis."176 While the DEIS references BLM's CADR Report, neither the CADR Report nor the DEIS includes a baseline condition of the Japanese American community. The DEIS should include the current condition of the Japanese American community in detail in order to detail the Alternatives' negative impacts on the Japanese American Community. The baseline condition should include the impact of the incarceration as offset by actions that uplift as outlined in this letter. This lack of information is likely due to the BLM's failure to follow DOI's policy guidance to engage with Environmental Justice communities early in the planning process.177 No analysis of substantial scholarly research on the Japanese American Community. Without commenting on the adequacy of the DEIS's analysis of avian species, bats, pollinators and insects, we note that the EIS includes 20 pages of listed scientific articles relating to Avian and Bat Species178 and seven pages on Pollinators and Insects.179 In contrast, the DEIS's Environmental Justice Section includes a reference to the CADR Report180 and NPS planning documents.181 There are scores of scholarly articles that describe the baseline social and health conditions of the Japanese American community. Professor Donna Nagata at the University of Michigan, for example, has published numerous articles over many years documenting the ongoing inter-generational trauma and psychological and health impacts of the incarceration on the Japanese American community. Other scholars have documented the therapeutic benefits from the commemorative events and pilgrimages.183 As noted in this letter, other scholars have described the condition of the broader AANHPI community resulting from COVID hate crimes and racial prejudice during the COVID pandemic. CEQ's NEPA regulations require that "[d]ata and analysis in a statement shall be commensurate with the importance of the impact."184 Because of the "disproportionately high and adverse impact on the Japanese American community,"185 we suggest the following detailed baseline conditions to include the following past actions: • Pre-World War II racial prejudice and exclusionary laws and policies, such as Alien Land Laws. • Forced removal and incarceration of the entire West Coast Japanese American community in World War II, to include family separations, loss of homes, businesses, farms, pets, jobs, friends, communities and lives on the west coast. • Stress and trauma of life in incarceration sites. • Post World War II, the breaking up of the community and racism. The baseline condition analysis can include actions that uplift the Japanese American community on the road to healing. These negative visual impacts lead directly to social effects on the Japanese American community. The Council on Environmental Quality (CEQ) NEPA regulations require analysis of social and health effects that are interrelated with environmental effects: (g) Effects or impacts means changes to the human environment from the proposed action or alternatives that are reasonably foreseeable	which include additional details on the history of the monument, the decreasing number of survivors, and the need to preserve their oral histories. The affected environment in Section 3.5.2 also describes the benefits of the NHS to the Minidoka-connected communities, in terms of opportunities for healing, commemoration, remembrance, and education. Additional discussion of commemorative events and directives that are intended to provide opportunities for education, commemoration, and uplifting of Minidoka-connected communities have been added to the environmental justice analysis in Section 3.6.1.1 (Affected Environment) in the EIS and in EIS Appendix 9 to provide more context within the affected environment. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns. See response to comment 11535-50 regarding meaningful engagement with environmental justice communities and response to comment 11535-49 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding BLM compliance with environmental justice EOs. The entirety of the EIS complies with the requirements of NEPA for the project. The Environmental Justice section of the EIS (Section 3.6) specifically addresses the policy of EO 12898 for considering effects to disadvantaged communities and relies on Environmental Justice Guidance Under the National Environmental Policy Act (CEQ 1997), as cited in the Environmental Justice and Socioeconomics section of the Literature Cited in EIS Appendix 10. NEPA review does not require the creation of new studies, such as a baseline study document, but rather permits the BLM to apply existing data within its analyses. Section 3.6 provides sufficient background information to inform the BLM's analyses. NEPA does not require information to be exhaustive or encyclopedic. Also see response to comment 12859-21 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to the final EIS.
12859-21	Kristen Brengel, Robyn Achilles; Friends of Minidoka	[Deficiencies cited regarding the Japanese American Community, the impacts and effectiveness of mitigation measures.] Psychological Effects. In addition to a baseline, courts have required agencies to assess both the physical and the psychological effects along with indirect and cumulative impacts on effected communities. In People Against Nuclear Energy, the Supreme Court held that "[a]ll the parties agree that effects on human health can be cognizable under NEPA, and that human health may include psychological health."186 In Access Fund v. Department of the Interior, the U.S. District Court (D. Idaho) held that: … psychological factors have to be weighed and evaluated by the NPS in reaching its management decision just as in another context a federal agency would have to measure the pollutants in a mountain stream to determine compliance with the Clean Water Act, even though the first is a 'subjective' assessment, while the latter is a 'scientific measurement.'"187 BLM's analysis does not include an analysis of the psychological impacts of the wind project, including an analysis of anxiety, depression and related physical health impacts. BLM also did not consider indirect and cumulative psychological impacts. For example, telling the stories of the incarceration is painful and has emotional impacts. As noted by Secretary Haaland at the Amache Roundtable in 2022, "I also know that reliving our trauma is never easy." There are cumulative impacts from the ongoing scourge of COVID hate crimes.	See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns.
12859-22	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Japanese Alaskans – families with both Japanese and Alaska Native ancestry The DEIS does not adequately describe or assess the impact of the project on Alaska Native survivors and descendants. "For EJ purposes, the definition of tribal populations is broad: 'a person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.' Any American Indian or Alaska Native qualifies. Membership in a federally recognized tribe is not required."188 The U.S. Government directed that Japanese Americans families in Alaska be relocated, leading to the forced removal of approximately 145 Japanese Alaskans from their homes and communities to Minidoka. Most of the Japanese Alaskan families, including those of Alaska Native and Japanese descent, were incarcerated at the Minidoka Relocation Center purposely located in a desolate and isolated area of Idaho. The forced removal had devastating impacts particularly on these Alaska Native families and created unthinkable hardships. At Minidoka, incarcerees with both Alaska Native and Japanese ancestry were even more isolated within the camp because they were torn from their Native communities and culture and lived in a desolate desert-like environment and with people of an unfamiliar culture—some hadn't associated before with Japanese Americans. Assigned to a separate barracks block (block 24), they formed their own unique community at the center of the Minidoka camp to provide strength and support to one another.189 As noted by Marie Matsuno, Japanese Alaskans had to overcome obstacles upon their return to Alaska Native communities, including being sent to boarding schools away from home.190 American Indian Religious Freedom Act. E.O. 13007 directs BLM to avoid harming sacred sites "to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions."	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal knowledge related to this important site and records this information for the project with the comment provided here. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. Also see response to comment 11315-5 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding Alaska Natives and the BLM's scoping and consultation efforts. See the introduction to EIS Section 3.5 (Cultural Resources) in specific reference to EO 13007.

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		The Minidoka Honor roll and other features at Minidoka have cultural importance to Alaska Natives incarcerated at Minidoka and their descendants.	
12859-27	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Generational Change. The DEIS describes the Japanese American community with a very broad brush, without the necessary baseline conditions, including the generational changes. With the passage of time, we are losing Minidoka survivors. Minidoka survivors are now in the late-seventies, eighties and older. The Japanese American community is in a race against time to commemorate and preserve these sites to honor survivors and ensure that we honor survivors while they are still alive. The first generation of Minidoka descendants, who were born after the incarceration, are also advancing in age. Preserving these sites is critically important to provide meaning to the lives of their late-parents, grandparents and family members, many of whom served in the military. Through multi-generational visits to Minidoka, the Japanese American community seeks to engage the next generation of young people as stewards of Minidoka. Minidoka is our past and our future: Even though many of the ambitious goals of the Japanese American community have been realized, the pilgrimages continue to fulfill an important function. Nisei join their children and grandchildren on these journeys, and the rituals have become intergenerational affairs.50 As such, they provide the opportunity to share long-suppressed stories and feelings with one another.	See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and related comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) cited there. The affected environment presented in EIS Section 3.5.2 for Minidoka NHS describes the importance of preserving the historic site for continued learning and healing. Section 3.5.2 also incorporates by reference additional documents, such as the Minidoka National Monument General Management Plan, the Minidoka NHS foundation document, and the Lava Ridge Stakeholder Assessment and Engagement Report, which include additional details on the history of the monument, the decreasing number of survivors, and the need to preserve their oral histories. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to the final EIS.
12859-36	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Definition of Recreational User and Tourists. While the DEIS does not define recreational users and tourists, its consultant lists recreational users as including “those involved in active recreation (e.g., hiking, off-highway vehicles, hunters) and those involved in more passive recreational activities (e.g., sightseeing or wildlife observation) … [a]s distinguished from recreational visitors, tourists may be just passing through the local area or staying for a period of varying duration to enjoy local attractions. Tourists typically come to the area for activities such as visiting historic or geologic sites, taking sightseeing tours, visiting friends and family, and attending festivals or events…”249 We recommend that BLM develop a more accurate definition of visitors to Minidoka.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives.
12877-1	Emily Yoshioka	The Lava Ridge wind project will desecrate the Minidoka National Historic Site, which stands as a sacred place for the Japanese American community and an opportunity for education to any and all who visit. In 2015, I traveled to the Minidoka National Historic site with my family for the first time. I was able to experience Minidoka with my grandmother, whose memory was stirred by the physical reminders of camp: the barracks, the dry and dusty heat, and the horizon reaching far away. The immersive physical environment of Minidoka is powerful and must be protected for current and future generations. The wind project will have moderate to severe impacts on the viewshed from the Minidoka National Historic Site, causing a direct impairment of resources. The DEIS failed to include how the immersive environment of Minidoka will be preserved.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing. The EIS analysis related to Minidoka NHS—see EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources)—considers the perspective of a person on that site. The sense and feeling that Minidoka NHS is able to convey of its historical significance are among the immersive experiences considered in assessing impacts from the project to Minidoka NHS in EIS Section 3.5. EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) describes the purpose of Minidoka NHS, including its history and significance and how—beyond adverse effects to Minidoka NHS in terms of Section 106 of the NHPA—the Japanese American community considers project impacts to be of further severity from a cultural perspective and harmful to their rights. The EIS further describes concerns that, in addition to visual impact, extend to the emotional impact the appearance of the project on the landscape could have on the Japanese American community’s experience of the Minidoka WRC and Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to the final EIS.
12877-2	Emily Yoshioka	I question the ability of the DEIS to adequately consider the impact that the Lava Ridge wind project will have on the Japanese American community. It was very frustrating to read the Minidoka National Historic Site as a place for “Tourists and Recreationalists.” This coded language reflects a long history of harmful euphemisms employed by the Federal government to refer to the forced removal and mass incarceration of Japanese people at American concentration camps. My pilgrimage to Minidoka is not as a tourist or a recreationalist. How can an evaluation that truly considers the weight of impact on the Japanese American community be ensured, given the lack of cultural competency in the DEIS (which President Biden calls for in the Executive Order on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) regarding inclusion of EO 14031 on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders.
12950-1	Susan Stacy	Comment No. 1: Significance of the viewshed from the Minidoka National Historic Site (Hunt War Relocation Center). The Japanese American community is not the only community with a profound interest in historic sites in the United States that commemorate a gross cancellation of the constitutional rights of American citizens during WWII. All Americans who have belonged to a group whose rights were abridged in our long history have a stake in Minidoka. This is a site of "conscience," not a tourist destination. It is not by accident that visitors who go to the Site use terms like "pilgrimage" to describe their purpose. Along with cancellation of rights, American citizens were forced to undergo extremely punitive conditions, which included removal from their homes and forced re-location to the most isolated, bereft, and harsh settings that could be found in the "inland" regions of the United States. Since a more "pleasant" setting would not have suited the punitive quality of the government's relocation, the purposes of the Minidoka National Historic Site - to "remember" the miscarriage of the US Constitution-includes preservation ofboth the site ofthe remains ofthe War Relocation Center and its stunningly harsh environment of "nowhere." The current proposal to derive energy from "wind" exploits one of the worst qualities this site offered to the prisoners at Minidoka. This is a historic irony that, in my view, has little to redeem it. To "enclose" the viewshed with wind turbines will obliterate the memory and the reality of "nowhere." It should not be permitted.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding recognition of Minidoka NHS as an important site of national conscience, moral reflection, and community healing and comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS, as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, reducing noise, and avoiding physical project impacts at Minidoka NHS. Please note that under no proposed alternative would the project place wind turbine generators in layouts that would enclose the viewshed of Minidoka NHS. The project would be sited generally to the northeast, with the range of turbines differing from north to east of Minidoka NHS depending on action alternative. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding nearest turbine placement and the BLM’s development of the Preferred Alternative.

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12986-1	Victor Yamada	the proposed project and its discussed alternatives would cause significant impacts to the Minidoka National Historical Site. I am addressing significant impacts under 3 topics -Visual Resources, Cultural Resources, and Environmental Justice. Project Components - The wind structures (including the towers and extended vanes) would be up to 700 feet high. For comparison, these heights are similar to the Seattle Space Needle or a 70-story building. Visual Resources - The wind towers would be clearly visible at locations on the Minidoka National Historic Site. An unobstructed view of the sweeping vistas and desolate environment is essential to the immersive experience and practice of commemorating those who were incarcerated at the Site. Cultural Resources - The visual changes would significantly impact the setting, feeling, and association of Minidoka National Historic Site. The Site tells the stories of the forced incarceration of Japanese Americans and ensures they are honored and preserved for future generations. It is integral to the identify of the Japanese Americans taken from their homes, separated from their families, and imprisQned in a purposely isolated environment thousands of miles from home. Appendix 8, Cultural Resources Program Assessment, does not address these impacts. Environmental Justice - The proposed project and associated visual changes would have significant and adverse effects on the setting, feeling and experience at Minidoka National Historic Site. The Site is an acknowledgement of the injustice that happened to thousands of Japanese Americans. It notes the distinct population who suffered unique experiences before, during, and after incarceration associated with World War II.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and related comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) cited there. Please further note that the stipulations in the HPMP and specific HPTPs under the PA (EIS Appendix 8 [Cultural Resources Programmatic Agreement]), when finalized and executed would resolve adverse effects to historic properties when implemented, including mitigating adverse effects to those historic properties associated with Minidoka NHS. The PA in the draft EIS was in draft form to provide the public the opportunity to comment upon it.
13006-7	Leon Smith	8) Recommend that BLM include protective measures for the Minidoka NHS, MRC, and Minidoka TCP. Recommend BLM consider the impact on Alaskan natives that were incarcerated at MNHS and the social/health/trauma impact on the Japanese American community in greater detail. It is a sacred site. 9) If the project goes forward against the strong objection of the subcommittee, recommend that BLM include a methodology to mitigate the psychological impacts on Japanese Americans for the loss of their sacred ground and their sense of purpose. Minidoka gives their community a sense of purpose and meaning. It ties the past to current events and gives them a purpose.	See responses to comments 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site), 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site), and 12589-2. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns.
13019-1	Bill Gannon	I would like to comment after first seeing a misleading ad on Facebook that made no mention of the Japanese' horrible treatment during WWII and how this site is a meaningful reminder of this shameful American history. First of all, FB ads that don't give both sides a fair treatment are dishonest and shouldn't be legal, but for now that's where we are. However after some research it is my opinion that the windfarm should be allowed if the money-makers in the project are willing to negotiate some kind of settlement. It is my opinion that that should include a museum of the history of that area should be created and located in a large city like Boise so more people are educated on the issues.	See response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding mitigation considerations for Minidoka NHS.
1395-1	Julie Abo	I am a descendant of Minidoka incarceration camp survivors and I am a public historian. Imagine if Antietam or Gettysburg battlesites, now sacred grounds were surrounded my windmills. This would be unacceptable. So why is this being considered near the Minidoka National Historic site and on Shoshone Bannock ancestral lands? I feel the echo of the =93race prejudice, war hysteria and a failure of leadership=94 that was condemned by President Reagan is happening again. We need long term solutions, not a temporary fix until the next project comes along. There are already other projects in the pipeline. Let's site these projects appropriately from the start. Please, don't leave us out of this process again.	As stated in the Purpose and Need section of the EIS, MVE has applied for a ROW for the project and the need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V). The BLM has not yet decided, and would decide in a ROD on the project, whether to approve, approve with modifications, or disapprove the project. MVE (2023) presents the basis for wind energy generation siting in this area. The action alternatives in the EIS for developing the project consider various siting or layout alternatives that the BLM has analyzed based on and from which the BLM has arrived at its Preferred Alternative in the final EIS. These analyses throughout the EIS include assessment of the cumulative impacts of the project in relation to other reasonably foreseeable actions in the vicinity, including other proposed wind energy developments. The BLM has included and provided opportunities for input on the project since providing notice in the *Federal Register* and has since provided specific outreach to Japanese American communities.
2823-1	Kyle Kinoshiza	THE DEIS contains a number of objectionable features that end up minimizing the actual negative impact of any of the alternatives. One of the main problems which does this is the way in which they characterize the human communities impacted by the Lava Ridge project. First, they list the Japanese American and Native American communities with the forms of wildlife < treating these peoples as objects. There is a racist history of this manner of classifying these peoples that rationalized the marginalization and even genocidal treatment. Secondly, the characterization of our peoples as "tourists and recreationalists" mocks and trivializes our pilgrimages and the solemn history of racism behind our memorialization of the Minidoka National Historical Site and the Native American land. It allows the BLM to reduce the human impact of the Lava Ridge project to a slight inconvenience rather than the desecration of sacred sites and the disruption of the healing functions of this site and these lands. The DEIS characterization is minimizing the impact of Lava Ridge as a part of a long history of exclusion and forcible removal of Native tribal peoples and communities of color like Japanese Americans, its language is consistent with the justifications of colonization and racist treatment - another case of "White Washing". Change this language, and include in the DEIS much more information on the human impact of Lava Ridge.	See response to comment 3749-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
3506-1	Beth Harrington	I am writing to oppose any plan that would aversely affect the sacred Minidoka NHS site. Please see my comments I am concerned about the impact of wind farms on Lava Ridge on the Minidoka NHS. This is not a “tourism” site as implied in some of the proposal’s materials but an important source of healing for the Japanese American community. A wind farm plan that visually encroaches upon this place would destroy its integrity and dishonor the people who were held here unconstitutionally. I urge decisionmakers to reconsider any plan that would have a deleterious effect on this sacred location. Thank you.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site.

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3542-6	Sue Page	Why is the government even considering this plan when the possibility for destruction of the aquifer is a possibility? The possibility noted in all the proposals of potential damage to historical sites such as Wilson_Butte_Cave, Minidoka National Historic Site.	As stated in the Purpose and Need section of the EIS, MVE has applied for a ROW for the project, and the need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V); see response to comment 1395-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Regarding potential impacts related to the aquifer, see EIS Section 3.17 (Water and Wetland Resources). For potential impacts to cultural resources, including Wilson Butte Cave and Minidoka NHS, see EIS Section 3.5 (Cultural Resources).
3749-1	Kyle Kinoshita	I am writing this letter to express my extreme dissatisfaction with the Lava Ridge Draft Environmental Impact Statement (DEIS). There are aspects of the DEIS that reinforce my overall opposition to the Lava Ridge Wind Project. My perspective comes from being the son of an entire family which was incarcerated at the Minidoka War Relocation Center during World War II. My mother, father, aunts and uncles and grandparents were forcibly removed from Seattle and the Portland area in 1942 and placed in the Minidoka concentration camp. This was an extremely traumatic and life-altering event for our family. To hear that the Bureau of Land Management is considering allowing the construction of the Lava Ridge Wind Project to move forward and impact the Minidoka National Historic Site (NHS) is deplorable. The Lava Ridge Draft Environmental Impact Statement exacerbates the distressing aspects of the project. The entire DEIS minimizes the nature and historic importance of the Minidoka NHS. The NHS is place of solemn pilgrimage, reflection, and commemoration, in the same manner as many other sacred memorials and battle sites throughout the U.S. There are numerous places in the document that ignore or trivialize the historical importance of the NHS, but I will focus on a few. The document often refers to the those who visit the Minidoka NHS to honor their ancestors incarcerated here as “tourists and recreationalists” (pp. 276, 473, 474, 483, 486, just to name a few) and an “environmental justice group” (p. xviii of the Executive Summary), which would be impacted, on an equal level as would be the various forms of wildlife mentioned in the document’s table (see pp xv-xxiv). The insulting nature of how our community is characterized in this manner is obvious. Further, we do not visit the site for titillation or entertainment. We are an ethnic community who come to the site in remembrance of a devastating act of racism during World War II. These euphemisms are a degrading minimization of the crimes perpetrated against our community. Jewish pilgrims to European death camps, or Black African Americans commemorating sites such as the Edmund Pettus Bridge would never be called “tourists and recreationalists” or an “environmental justice group”, as that would be ridiculously ignorant. Yet the DEIS callously refers to our community remembering this tragic event in this manner. The authors of the DEIS would do well to read President Biden’s “Executive Order on Advancing Equity, Justice and Opportunity for Asian Americans, Native Hawaiians and Pacific Islanders” to understand their racist aggression. Although it largely ignores the importance of the Minidoka NHS to our community, as well as the detrimental impact of the wind farm project, the DEIS does make a halfhearted and highly minimal attempt to characterize the damage. On p. xviii, Alternative B it points out that “Native American Tribes and Japanese American communities would be subject to disproportionate high and adverse effects from changes to the setting, feeling, and visitor experience at Minidoka WRC and Minidoka NHS, and to physical and non-physical impacts to cultural resources.” Even Alternative E, characterized as the least impactful, points out that “(d)isproportionately high and adverse impacts to the Japanese American community and Native American Tribes would still occur”. But what are these “effects”? The DEIS still tiptoes around the fact that it is a site sacred to both Japanese Americans and Native American tribes because of acts of racism as well as land theft and genocide. With the gaping omission and silence around the political and social realities behind these historical legacies, the authors of the DEIS can comfortably characterize the alternatives in purely technical terms. The Minidoka National Monument was established in 2001 and declared a National Historic Site in 2008 as a site of historical importance, commemoration, and healing from collective trauma, where visitors can learn about the injustice of the wartime removal and incarceration of an entire community based solely on their race. It is a special place where people come to see, to learn, and to share, in some small measure, the experience facing Japanese Americans who were imprisoned by their own government so far from home. It is a space where visitors can contemplate lessons of our nation’s past that should never be forgotten or repeated again. That space will be irreparably diminished -- emotionally, visually, physically – by the intrusion of hundreds of massive wind turbines, transmission lines, power stations and roads next to the site. The DEIS makes light of these realities. I understand that there is an absent “Alternative A” in prior documentation but not mentioned in the DEIS which would not allow the project to move forward. This alternative is the only just course of action for the Bureau of Land Management. To conclude, the DEIS completely negates the fact that the Minidoka NHS is a sacred place of reflection and healing for Japanese Americans such as myself who am a descendant of incarcerated families. It is highly distressing to an entire community which was a target of racism to have their experience papered over by inaccuracies, mischaracterizations and technical jargon of the DEIS. I am also forwarding this letter to my elected U.S representative, Pramila Jayapal, and senators Patty Murray and Maria Cantwell.	The BLM respectfully accepts the additional detail regarding Minidoka NHS and personal experiences related to this important site and records this information for the project with the comment provided here. See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives, and the revision of the related text of the EIS. Within the EIS, under NEPA the BLM is required to analyze the areas of potential significant impact of the project on the human environment and the natural environment. Meeting the requirements of NEPA and assessing project impacts on the human environment, the BLM considers the impacts of the project on all potentially affected communities, in particular in EIS 3.6.1 (Environmental Justice Communities). This includes considering environmental justice under the law, regulations, and federal policy. Although other laws and regulations require the BLM to assess various aspects of the natural environment as well, including plants and animals, at no point does the BLM or the EIS compare the human environment and the important factors concerning potential impacts to people to the natural environment and the factors concerning impacts to plants or wildlife. Different methods are applied across these analyses, and at no point are either leveled in comparison or contrast to each other in the EIS. See EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) regarding inclusion of EO 14031 on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) describes the purpose of Minidoka NHS, including its history and significance and how—beyond adverse effects to Minidoka NHS in terms of Section 106 of the NHPA—the Japanese American community considers project impacts to be of further severity from a cultural perspective and harmful to their rights. The EIS further describes concerns that, in addition to visual impact, extend to the emotional impact the appearance of the project on the landscape could have on the Japanese American community’s experience of the Minidoka WRC and Minidoka NHS. Section 3.6.1 (Environmental Justice Communities) describes the importance of Minidoka NHS and WRC to the Japanese American community in terms of key components of the visitor and survivor experience, using information and phrasing obtained from the Minidoka NHS foundation document, NPS consultation, as well as the BLM’s direct engagement with the Japanese American community. The impact analysis presented in Section 3.6.1.2 (Impacts) took a hard look at the potential impacts of the project (i.e., noise, traffic, visual) on the visitor and survivor experience and heavily referenced the feelings and sentiments expressed by members of the Japanese American community throughout the impact analysis to present a strong message that any changes to the setting, feeling, and visitor experience at Minidoka NHS and the Minidoka WRC would be viewed by members of the Japanese American community as acts of intrusion and desecration to a sacred site and a continuation of racial injustice. The EIS fully recognizes the nature and importance of Minidoka NHS and of the potential project impacts to the site, even if it cannot express that nature and importance to the full satisfaction of everyone. The nature and importance of Minidoka NHS in particular is presented in EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). However, to more fully address the significant aspects of Minidoka NHS, the BLM added a new section (Minidoka National Historic Site Interpretive Purpose) to the EIS (see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site)). The BLM and the NEPA process afford the Japanese American community and others the opportunity to express their sentiments and provide their views through comments, which the EIS then presents in this comments and responses section. As noted in response to comment 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns), the EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking to protect the historic properties associated with Minidoka NHS. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, FLPMA, and other laws, regulations, and federal requirements, in advance of the current project. The BLM will continue to plan for the avoidance, minimization, and mitigation of adverse effects to historic properties, including at Minidoka NHS, under a PA, completing the Section 106 process in consultation with consulting parties. Varying degrees of non-physical impacts to Minidoka NHS would result under any of the action alternatives, and various mitigation measures would be applied as stated in the EIS. The BLM is considering a No Action alternative for the project, by which it compares the potential impacts of the action alternative analyses in the EIS. The BLM has not yet determined whether it will approve the project, approve the project with modifications, or not approve the project and will not make a decision on these matters until after the PA (see EIS Appendix 8 [Cultural Resources Programmatic Agreement]) is signed and a project ROD is released. The BLM decision on the project will be stated in the ROD.

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			The No Action alternative for the project remains Alternative A in the EIS. Also see response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS.
3777-1	Adele Hetzel	Minidoka NHS could be improved with a partnership and donations from MVE to make it a place where people want to go to learn about and learn from the tragedy of what the Japanese-American community endured. However, I believe the turbines won't impact the desolation of the site.	See response to comment 4315-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
3811-2	Alwena Savage	I am concerned about Tribal Treaty Rights, and protection for Minidoka.	Tribal treaty rights are addressed in EIS Section 3.5.1 (Native American Resources). Minidoka NHS is addressed variously throughout the EIS, in particular within Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
4220-1	Sue Page	The photos of the Minidoka National Historic Site with tiny, hardly visible sticks in the background are insulting. The tallest structure at the site is the guard shack at 29 feet. The turbines are over 740ft with blade spans over the size of a football field. The photos don't show the blinking lights or let you hear the whoosh sound they will generate.	See response to comment 8458-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
4315-1	Alice Nicholson	I am grateful for the opportunity to comment on the draft EIS and urge you to move forward with alternative C, which allows this project to coexist with the Minidoka NHS without impacting the feeling of desolation.: Minidoka NHS could be improved with a partnership and donations from MVE to make it a place where people want to go to learn about and learn from the tragedy of what the Japanese-American community endured. However, I believe the turbines won't impact the desolation of the site.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed at EIS Section 3.6.1 (Environmental Justice Communities). One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and enhance awareness of its history and the history of the Japanese American community.
4801-1	Kay Hummel	The cultural and historic significance of the original Minidoka camp acreage should not be underestimated or merely 'worked around' as if the current and very small designated National Historic site is all that matters or requires analysis. It is not a simple "tourist site." * The National Environmental Policy Act (NEPA) requires a full appraisal of all historical, cultural and religious impacts of this industrial siting decision. There are many negative ones. I do not see them all fully evaluated in the documents. Just one component is the extreme size and height of the MVE's machines -- their mass and sightline appearance is significant, even when viewed at four or five miles distance.	EIS Section 3.5 (Cultural Resources) assesses but is not limited to the impacts of the physical and non-physical (visual and auditory) impacts to cultural resources, inclusive of Minidoka NHS. The physical APE for the project would not overlap Minidoka NHS; however, non-physical impacts to Minidoka NHS and physical and non-physical impacts to the Minidoka WRC would occur under different action alternatives. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding impacts, preservation, and mitigation for Minidoka NHS. See responses to comments 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS. As further noted in response to comment 11985-1 (see in Table A-3g, Cultural Resources and Native American Concerns), the EIS and Section 106 review and analysis of the project represent appropriate steps that the BLM is taking to protect the historic properties associated with Minidoka NHS. The BLM is meeting all program and resource management planning requirements under the NHPA, NEPA, FLPMA, and other laws, regulations, and federal requirements, in advance of the current project.
5189-1	Traci Wood	What about the Minidoka National Historical Site, how will this impact the survivors and family members of those lost there. It will be desecrating a sacred site. It is not honorable or pleasant to those that come to this site for healing, memorials etc.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site), in general.
5322-1	Randal Elder	To whom it may concern: “They could take their windmill farms elsewhere, but we can't take Minidoka anywhere else,” said Tomita. https://www.king5.com/article/news/community/facing-race/japanese-internment-camp-survivors-southern-idaho/281-35b404cb-4560-4e17-87de-78bc76f67e86 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.king5.com%2Farticle%2Fnews%2Fcommunity%2Ffacing-race%2Fjapanese-internment-camp-survivors-southern-idaho%2F281-35b404cb-4560-4e17-87de-78bc76f67e86&data=05%7C01%7CBLM_ID_LavaRidge%40BLM.gov%7Cae5ee643f0d444bfa09908db1e549703%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638137120880710829%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000%7C%7C%7C&sdata=Gi4Dm7PdzxMKFsxjY5%2BnPowlZNCQjG5VnmzQ0Z%2BLS2w%3D&reserved=0> I agree. Please do not place any turbines at or near Minidoka. Respectfully, Randal Elder 18830 51st pl w Lynnwood WA 98036	The BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS.
5331-1	Joan Hurlock	The Lava Ridge Wind Project (LRWP) will adversely impact the Japanese-American community because the 197,000 acre project site will be within the vicinity of the Minidoka War Relocation Center and National Historic Site. These monuments serve as a reminder of the atrocities meted out on the Japanese-American community. The MWRC and MNHS are vitally important to people like Janet and Dan. Where are the Social Justice Warriors? We must not forget…we must not intrude on the somber atmosphere…we must not destroy their history. One would think that this would be the ONE thing that would quash the Lava Ridge project….	Please note that the action alternatives described in the EIS, including the BLM Preferred Alternative in the final EIS, consider project siting that would be reduced from the cited 197,000 acres of the Proposed Action. The Proposed Action, action alternatives, and the BLM’s Preferred Alternative do not include turbines within Minidoka NHS. Alternatives C and E and the BLM’s Preferred Alternative do not include turbines within the Minidoka WRC. Also see response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) —regarding consideration of impacts on Minidoka NHS, the surrounding Minidoka WRC, and to the Japanese American and Minidoka-connected communities—and related comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) cited there.
6870-3	Name Not Provided	I support green energy but not this project. Green energy projects must be sited in locations that minimize impacts to nationally important places. Why was this project proposed next to Minidoka and on the historic	The project alternatives, including the BLM’s Preferred Alternative, would not locate project elements within the historic boundary of Minidoka NHS. The national importance and setting of Minidoka NHS were recognized in

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		footprint of the Minidoka War Relocation Center? What was the BLM thinking? Did they not know or acknowledge the national importance of Minidoka and do proper site analysis and learn that the viewshed and environmental setting are intrinsic resources to Minidoka? The viewshed and setting are integral to the site and people's experience of it. How will my community be able to commemorate the injustice of the WWII incarceration and the 1,000 Nisei soldiers listed on the Honor Roll when there are hundreds of wind turbines spinning across the skyline and knowingly permitted by Secretary Haaland, Director Manning, Director Sams, and all the other government officials? Any wind turbines, no matter their height or distance, perpetrate further injustice on my community. The wind turbines will visually, experientially, intellectually, and emotionally wreck Minidoka National Historic Site for the Japanese American people and by extension the American people. The local Magic Valley community is aligning with the Japanese American community in opposition to Lava Ridge Wind Farm because they also understands the Lava Ridge Wind Project is further injustice and desecration. The historic preservation community sees this impact and injustice when they designated Minidoka as one of their 11 most endangered historic sites.	initial project scoping and addressed in the EIS; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose). Also see responses to comments 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, avoidance of physical project impacts at Minidoka NHS, and mitigation of non-physical impacts.
6876-2	Jonathan Jarvis	As Director, I worked alongside BLM Directors Bob Abbey and later Neil Kornze to ensure renewable energy projects were sited, sized and developed in a manner that did not significantly impact sites of our nation's natural and cultural history. Through numerous long discussions, we often agreed on a decision that achieved both. Occasionally, as Director, I needed to be clear that the impact of a proposed action could not be mitigated. For instance, I was directly involved in preventing LS Energy from building a power line through the Minidoka National Historic Site in 2010. It seems that LS Energy is back again, this time as subsidiary Magic Valley Energy with its Lava Ridge Wind Project and proposing another project that impacts a site essential to American history.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS and migratory birds to understand how the potential impacts relate to laws, regulations, and policies.
6877-1	Anastasia Christman	As a former university professor of US history, I must oppose the proposed Lava Ridge wind turbine project. Among the courses I taught was one on historical monuments and historical memory in which we explored the way that public monuments are key to building a social history and especially to opening conversations about episodes of our history that encompass racism, violence, and oppression. The Mindoka National Heritage site is just one of these monuments. This site is becoming even more important as the generations who lived through illegal incarceration in these concentration camps pass on; subsequent generations must be able to go this site and experience, even if only in a small way, the ramifications of the unspeakably racist policy of Japanese American incarceration.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the mitigation of impacts to and preservation of Minidoka NHS.
6899-1	Japanese American Community	All of the action alternatives will impair the viewshed and environmental setting and feeling of the place. One of the main reasons Minidoka was selected as a concentration camp site was specifically because of its remoteness and distance from population centers. It was also selected because it was a large tract of government land, there could be work opportunities clearing the land and transforming it into agricultural lands, and to realize the goals of homesteading the west. The construction of the wind farm will entail massive road building, transporting construction materials, and the turbines. The operation of the wind farm will result in a horizon of spinning wind turbines permitted by the government. This will both impair the fundamental setting of the site and visitor's experience of the site. It will be hard for visitors to focus on learning about the WWII Japanese American incarceration when their eyes are attracted to the spinning turbines. The National Park Service will need to add to their interpretation at Minidoka; they will need to add that the Department of the Interior is disregarding the sanctity of the site, disregarding the Japanese American community, and disregarding the former government's actions to apologize on behalf of the nation and make amends. The NPS will need to interpret this environmental injustice.	Although lessened, visual impacts would remain under any action alternative, including—as presented in the EIS—those that could affect the experience and sense of place; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). However, impacts would be mitigated, such as presented in EIS Section 3.5. As stated in the EIS, the project would use existing road networks where able, particularly for transporting construction materials; no project elements are proposed within Minidoka NHS, and no new roads would be constructed in the Minidoka WRC. See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives, including the BLM's Preferred Alternative, where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
7632-1	Lindsey Antram	I am writing as an ally to those formerly incarcerated and affected by the former Minidoka concentration camp and as a born and raised Idahoan and visitor to these lands. There is great historical and personal significance to survivors and descendants of survivors of the camp. The DEIS fails to protect this significance and honor the people affected and ignores the realities of the land by claiming it to be "tourists and recreation." A proper honoring of those affected is vital to preserving history and paying respects for wrongs done. The lack of compassion for the survivors and those once incarcerated at Minidoka is shown through the failure of education about the psychological effects of incarceration. It can be viewed here in a study by Donna Nagata. https://psycnet.apa.org/record/2021-05763-007 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpsycnet.apa.org%2Frecord%2F2021-05763-007&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8de9347a305247484f5e08db2fc9f22b%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638156316626035146%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=prfurPU5BKwkSGLA%2BSEJRe9t5ReqDhG9dzCv17aDZPw%3D&reserved=0> as an Idahoan I believe in preserving history and that includes honoring the people affected. The DEIS clearly fails to do this and overlooks mandates (https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/ <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.whitehouse.gov%2Fbriefing-room%2Fpresidential-actions%2F2023%2F02%2F16%2Fexecutive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8de9347a305247484f5e08db2fc9f22b%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638156316626035146%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site). Impacts related to the survivors and descendants of those incarcerated at Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and enhance awareness of its history and the history of the Japanese American community. See EIS Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site) regarding inclusion of EO 14031 on Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders. Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose). Also see response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM's apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding psychological harm and trauma for Minidoka-connected communities and associated EIS revisions that have been made to address these concerns.

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		7C&sdata=ygaTjqghP78tzGEdI0BBfAYcHjUqlYRTnk%2B2lO4L9v0%3D&reserved=0>) and common decency in its creation.	
8458-1	Sue Page	The photos of the Minidoka National Historic Site with tiny, hardly visible sticks in the background are insulting. The tallest structure at the site is the guard shack at 29 feet. The turbines are over 740ft with blade spans over the size of a football field. The photos don't show the blinking lights or let you hear the whoosh sound they will generate. They can liter the ground with dead birds around this site and the whole area. These beasts with flashing lights will dishonor those Japanese Americans who were displaced from their homes and treated with disrespect. To belittle this site by placing these beast here is shameful.	The visual simulations presented in the EIS, as in Section 3.16 (Visual Resources), are prepared with wind turbine generators being depicted as they would appear from KOPs, including at Minidoka NHS. Lighting effects from the project are also considered in the EIS, as in Section 3.16. Use of an ADLS would minimize the amount of time that red turbine lighting would be lit at night, only turning on when an aircraft is detected by the system. Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
8625-1	Ann Shintami	My name is Ann Shintami and my comment is if the Lava Ridge Wind Project moved forward, in honor of the internees of the Minidoka Internment Site, a historical area, I request consideration for renaming the wind project as a condition of citing to something that recognizes the Minidoka area. One suggestion is to rename it after a notable internee, perhaps, Kubota who was a prominent landscape architect who moved to the Seattle area.	Impacts related to the survivors and descendants of those incarcerated at the Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
8625-5	Ann Shintami	If this project moves forward, which I hope it does not, I would like it to not be called Lava Ridge. I would like it to be named for Kubota or another person that was held there during the war. I know a lot of people who have relatives who were there during the war and whose -- were children during that time or who were there with their parents, or who are friends or family of people who have gone out to the site in pilgrimage. There's annual pilgrimage from various communities around the Pacific Northwest that travel out there. And the experience for them is often life changing.	Impacts related to the survivors and descendants of those incarcerated at Minidoka WRC and other communities in terms of environmental justice (and associated mitigation, including compensatory mitigation) are addressed in EIS Section 3.6.1 (Environmental Justice Communities). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
8625-6	Ann Shintami	I think the drive in is also symbolic for people as they're coming in. You know people getting sent out on train when they were taken from Seattle and Portland and all these places and train -- taken from their homes with nothing but a suitcase and forced onto these trains to leave everything behind after being held in animal stalls. The smell of animals going to a train ride, like cattle, arriving at these places where nothing but cattle would even be around because that's how isolated it is. I think that barrenness of the drive in would allow people to experience what it really was like for their parents or their grandparents coming to this place. And I think that the wind development would impact, not just your experience on the site, but your experience to the site. And when people go out there and annually it's called a pilgrimage for a reason. You don't just drive up and start experiencing it as soon as you get to the site. You know, it's -- it's the journey to the site. It's even leaving from the big city centers where people -- where these things start. It's kind of like starting their journey like their ancestors did when they were taken from these bigger city centers where they were held.	Please note that the project is not along the entryway to Minidoka NHS. For to-scale simulations and viewing information for visual resources KOPs, including for the BLM's Preferred Alternative, from KOPs 1, 2, and 16 at Minidoka NHS, please refer to EIS Appendix 5 (Select Visual Resources Simulations) or the project visual resources technical report (SWCA 2024), available on the BLM project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/510). In addition to simulations from KOPs within Minidoka NHS, there are simulations from KOPs along travel routes such as Interstate 84 (KOP 3), Idaho Highway 24 (KOP 5), U.S. Highway 26 – Peaks to Craters Scenic Byway/Richfield (KOP 6), and U.S. Highway 26 – Peaks to Craters Scenic Byway (KOP 9). Also see response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new Section 3.19 (Minidoka National Historic Site Interpretive Purpose).
8643-2	Steve Woods, Pam Woods	The new view will also dampen the ability of visitors to the Minidoka Internment Camp from experiencing the isolated lives of those interned there during WWII.	See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
9080-2	The Coalition to Protect America's National Parks	The extent and severity of potential adverse effects to the landscape setting of Minidoka NHS (park) and the WRC is particularly concerning. The setting provides critical context to help visitors understand the purpose of the park and the experiences of the Japanese Americans who were unjustly incarcerated there. As described in the 2016 NPS Foundation Document4 for the site: The purpose of Minidoka NHS is to provide opportunities for public education and interpretation of the exclusion and unjust incarceration of Nikkei—Japanese American citizens and legal residents of Japanese ancestry—in the United States during World War II. Minidoka NHS protects and collaboratively manages resources related to the Minidoka War Relocation Center in Idaho and the Bainbridge Island Japanese American Exclusion Memorial in Washington State. Also described in the Foundation Document is that "[f]undamental resources and values are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to merit primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance." (Emphasis added) Most notably, Minidoka's environmental setting is identified as a Fundamental Resource and Value because: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. (Emphasis added) Because the site "commemorates the more than 9,000 Japanese Americans who were imprisoned at the Minidoka War Relocation Center (WRC) during the Second World War," Minidoka NHS is recognized as an International Site of Conscience.5 However, despite the historical significance of the site, we are very concerned that BLM has proposed authorizing the development of a massive wind farm within the footprint of the WRC and immediately adjacent to Minidoka NHS.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose) and where impacts are identified within EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). Please understand that the BLM is responding to MVE's application for a ROW on public land for MVE's project. The BLM has accordingly developed a range of alternatives to address resource conflicts, such as impacts to Minidoka NHS and within the surrounding Minidoka WRC. The BLM has not proposed authorizing the development of the project within the footprint of Minidoka NHS, and the Proposed Action, action alternatives, and the BLM's Preferred Alternative do not include any project development within the historic boundary of Minidoka NHS. In a ROD, following the final EIS, the BLM will decide to approve, approve with modification, or disapprove the project as proposed. The BLM's Preferred Alternative in the EIS would not include project elements in the Minidoka WRC and would include setbacks of the project wind turbine generators from the WRC. Additionally, the BLM has considered a No Action alternative for the project in addition to the action alternative analyses in the EIS.
9131-1	S. McClure	As a previous attendee of the Minidoka Pilgrimage, I was deeply impressed by the sacred nature of that site. Being among people whose family members had been interned there was extremely moving, both for the sense	See response to comment 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding action alternatives where turbines are set back from Minidoka NHS, thus reducing the appearance of

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		of the great wrong done to their forebears and for their commitment to preserving its history as a place of learning and witness. The emptiness and sky there is a huge part of the site and bears witness to what internees struggled against and overcame. To mar it with giant turbines would be a sacrilege and insult to people whose heritage is already one involving great suffering and loss. Thank you for considering my words and opinion. Stephen McClure	the size of turbines on the landscape, and avoidance of physical project impacts at Minidoka NHS. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose) and where impacts are identified, and how the BLM is addressing them, within EIS Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources).
9657-1	Saiyare Refaei	Families connected to Minidoka are just one of the stakeholders whose emotional wellbeing will be impacted if this project comes to fruition. What the DEIS fails to articulate the emotional harm that they will be causing to survivors and their descendants. The DEIS inappropriately names the Minidoka National Historic Site as for “Tourists and Recreationists” when this site is being protected as an area for reflection and healing for all of the survivors of forced incarceration, their descendants and all those who choose to visit this International Site of Conscience. The DEIS also fails to articulate the integral importance to preserve the cultural and natural landscape. Minidoka NHS educates all visitors on “righting a wrong”, civil rights and the multigenerational trauma inflicted by this forced incarceration. There is no mention of any potential trauma caused by this wrong mentioned in the DEIS. (Only civil rights violations are mentioned in the brief historical summary of the incarceration in the beginning of the document.) The DEIS also does not protect the viewshed from the Minidoka NHS. The report draft states a “moderate” degree of visual change that will not protect the integrity of the Minidoka NHS.	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site. Also see response to comment 11585-2 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the nearest turbine placement and the BLM’s development of the Preferred Alternative. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the final EIS including a new section (Minidoka National Historic Site Interpretive Purpose).
9657-4	Saiyare Refaei	The DEIS inappropriately names the Minidoka National Historic Site as for “Tourists and Recreationists” when this site is being protected as an area for reflection and healing for all of the survivors of forced incarceration, their descendants and all those who choose to visit this International Site of Conscience. The DEIS also fails to articulate the integral importance to preserve the cultural and natural landscape. Minidoka NHS educates all visitors on “righting a wrong”, civil rights and the multigenerational trauma inflicted by this forced incarceration. There is no mention of any potential trauma caused by this wrong mentioned in the DEIS. (Only civil rights violations are mentioned in the brief historical summary of the incarceration in the beginning of the document.)	See response to comment 12859-35 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the BLM’s apology and EIS revisions around correctly representing the Japanese American community and Japanese and Alaska Natives. See response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the address of impacts in the EIS to Japanese American and other communities associated with Minidoka NHS as well as regarding the EIS’s address of impacts to the natural and cultural landscape surrounding the site.
F1-1		Minidoka National Historic Site is a site of conscience where 13,000 Japanese Americans were incarcerated during World War II. Today it is operated by the National Park Service, which seeks to tell the painful stories of the unconstitutional forced mass incarceration of Japanese Americans during World War II.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and to related comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
F1-2		Construction of a wind project in this location could compromise Minidoka's ability to convey the setting in which Japanese Americans were imprisoned and degrade the park's ability to heal and ensure that this does not happen again. The federal government should not compound the damage it has already inflicted upon the Japanese American community at this site.	See response to comment 11305-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and to related comments 11622-4 (see in Table A-3g, Cultural Resources and Native American Concerns) and 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).

Noise

Table A-3r. Noise

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10426-5	Casey Stevenson	[These are my concerns which have not been addressed by the EIS which will impact thousands of people, and need to be reevaluated. Here are my concerns:] There are also concerns about the noise pollution caused by the windmills. The noise can be disruptive to nearby residents and wildlife, affecting their quality of life. Wind turbines generate noise, which may disturb livestock or wildlife in the surrounding area. If farms are located near wind farms, the noise may negatively affect the animals' health and productivity, and may cause stress and discomfort for farmers living nearby.	We understand and acknowledge these concerns and have already addressed them in the project noise technical report (SWCA 2022). Livestock and human health (residences and schools) are addressed here; other sensitive receptors and resources potentially affected by project noise are evaluated in detail in their respective EIS sections. This report offers an in-depth analysis of the noise impacts associated with the proposed wind turbines, using sophisticated computer modeling and on-site measurements to predict potential noise levels at various distances and conditions.
11295-1	E. Lara	I was surprised when reading the Noise Technical Report done by SWCA Environmental Consultants, "a noise assessment was not performed to measure the background noise levels at and near the sighting corridors" so the nighttime and daytime noise levels were assumed. This is found on page 6 underneath Table 4. The noise levels could be much less than the assumption for these almost 400 turbines. It will be a dramatic increase in noise for the common construction equipment which ranges from 74-85 dBA. The noise level will be great for the Magic Valley with helicopters producing 79 dBA along with the active construction moving during the construction period and the Noise Technical Report says "it is not possible to determine cumulative noise levels at any given point." We have heavy vehicle movement too. One residential NSA is 67 feet from a proposed access road. How can we put the nearby residents and the Magic Valley through this noise during construction (2-3 years)?	While it is correct that a specific noise assessment was not performed to measure background noise levels, this is a common practice in the early stages of wind turbine projects. Because a noise assessment was not performed to measure the background noise levels at and near the siting corridors, the Leq nighttime and daytime noise levels were assumed to be 34 and 40 dBA (equivalent to very quiet suburban and rural residential land uses), respectively, at the residential communities, and 22 and 16 dBA, respectively, at unoccupied open rangeland. It is important to note that the assumptions used for nighttime and daytime noise levels are based on extensive data from similar environments and situations, and they are made on the side of caution to ensure that any potential impacts are not underestimated. As for the noise from construction equipment and helicopters, these are sources of temporary noise during the construction phase. The BLM acknowledges the impact this may have on nearby residents and wildlife. However, these noises are transient and will cease once construction is completed.

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			Moreover, the claim that “it is not possible to determine cumulative noise levels at any given point” is specific to the construction phase. It refers to the variable and unpredictable nature of construction activities; not all equipment operates simultaneously, and their exact locations will change throughout the day and the project. When it comes to mitigating construction noise, there are measures in place. These include scheduling construction activities during the less sensitive times of the day and employing BMPs for noise control on construction sites.
11359-1	Alisa Bowman	Concern: Sound The sounds emitted by the towers have not been studied for the effects they will have on the wildlife in the area. The frequency that humans detect is not the same as the frequency that animals detect. There needs to be more research done on this subject before any decision could possibly be made.	This analysis recognizes that some of the sound frequencies emitted by the wind turbines may not be within the human audible range but may potentially be detected by animals. It is important to note that the project noise technical report (SWCA 2022) is only one component of the broader EIS analysis. Other sensitive receptors and resources potentially affected by project noise, such as wildlife, are evaluated in their respective sections of the EIS or in Appendix 3 (Issues Analyzed in Brief).
11410-1	E. Lara	Since we do not know yet the turbines that will be put at Lava Ridge, we should not allow the "worst-case" turbines (108 dBA (see 5.2.2 section) as it well exceeds the Ldn values 65 dBA. Residential development is not recommended at this level. The grazing for livestock will be difficult in this location as well with the turbines' total sound power level at 124.6 dB. This can cause hearing loss per section 3.2 in the Noise Technical Report. Livestock would also have to endure the noise level from a transformer area or cumulative sound in some areas.	The “worst-case” turbine sound level of 108 dBA mentioned in Section 5.2.2 of the project noise technical report (SWCA 2022) refers to the sound power level and not the sound pressure level. Sound power and sound pressure are two different but related concepts in acoustics. Sound power is the total noise that a source, like a wind turbine, produces. This is the 108 dBA value mentioned, and it is measured right at the source. Sound pressure level, on the other hand, decreases as you get farther from the source. This is the noise level that nearby residents or livestock would experience, and it is much lower than the sound power level due to the distance from the turbines. The environmental standards like day-night average sound level (Ldn) values 65 dBA relate to sound pressure levels, not sound power levels. The 124.6 dB level mentioned equates to the 108 dBA rating for the wind turbine, but it is essential to note that this level is in dB, not dBA. The unit dBA (A-weighted decibels) applies a filter that mimics the sensitivity of the human ear to different frequencies. Lower frequencies are de-emphasized, while mid-range frequencies are emphasized since the human ear is more sensitive to these frequencies. Lastly, the project noise technical report (SWCA 2022) and EIS consider the potential impacts of noise on livestock. While it is true that high levels of noise can potentially cause discomfort to livestock, these animals will not be located next to the turbine or transformer, and the sound pressure level they experience will be considerably less than the turbine’s sound power level.
11445-3	Mei Reifer	the in audible sound from freaking wind turbines will affect my health and my sleep. Please go to somewhere have no human live close by	See the project noise technical report (SWCA 2022), which analyzes potential noise impacts associated with the project.
11535-106	Steven Andersen	The audible impacts of this project will last decades and have a likelihood for profound consequences to humans, wildlife, and cattle and dairy cows that serve as the livelihood for local farmers, as well as the environment at national historic sites and indigenous cultural grounds. The potential impacts could destroy habitat, human health, dairy production, drive down land values, and drive people out of their homes and livelihoods. Further, the audible impacts associated with the proposed project will be unrelenting, 24/7, for the life of the 34-year project, from the multi-year construction phase through operation and decommissioning. Turbines of the 6 MW power scale and of this height have never been constructed on land – let alone a cluster of 400-500 of them. As a result, the impacts are unknown and require intense, reliable, and lengthy modeling before construction. The consequences of not fully understanding the audible impacts and vibrations associated with a project of this magnitude are multi-faceted and significant. The DEIS is missing critical information for a complete evaluation (including the specific locations of the turbines and models of turbines) and still safely concludes, the project’s noise impacts will be intrusive and wide-spread.	We have undertaken comprehensive and thorough studies to understand these impacts, including detailed noise modeling, which have been provided in the project noise technical report (SWCA 2022). The noise levels were estimated from a representative wind turbine generator model and have been predicted for the highest sound power level of 108 dBA at a wind speed of 9 m/s. These were compared with the relevant noise criteria to ensure compliance. Details of this modeling, including sound levels for the sources, were presented in Appendix B of the project noise technical report (SWCA 2022). The BLM analyzed the potential for impacts on humans, wildlife, livestock, and historical and cultural sites. These aspects have been, and will continue to be, considered seriously in the EIS.
11535-107	Steven Andersen	Robert Rand, ASA, INCE, who has more than 30 years of experience in industrial noise control, environmental sound and acoustics, and specific experience evaluating the noise impacts of industrial scale wind turbines, conducted an independent analysis of the noise impacts, based on the information available.326 As set forth in his attached Declaration and accompanying opinion, the Noise Technical Report (“Report”) included in the DEIS forecasts significant noise impacts for the agency’s preferred Alternatives C and E, which would affect several inhabitant homes, pollute the area with intrusive noise for decades, destroy the quiet character of the area and adversely impact the existing land uses for people and wildlife. As Rand describes, there is no way to “balance” these impacts, and so-called “noise reduction options” have proven unreliable. The only proven control option is shutdown.	The EPA’s stipulation of an outdoor noise level of 55 dB Ldn translating to approximately 40 dB Ldn indoors was a foundational guideline in the noise technical report (SWCA 2022). The report finds that, even in a worst-case scenario at all residential receptors, sound levels during project operation would conform to these recommendations. The predicted noise levels would remain within the bounds of what is deemed healthy and non-disruptive for human habitation. Mr. Rand stated, “At this time, the only reliable noise control option for large three-bladed wind turbines is sufficient distance established prior to permit.” The modeling data presented in the noise technical report illustrates that the proposed distance between the wind turbines and residential receptors effectively ensures that the noise impacts remain below the 55 dBA Ldn threshold. This effectively mitigates any concerns regarding potential sleep disturbances or detrimental impacts on human health and well-being. In conclusion, the project noise technical report (SWCA 2022) draws on reputable sources and rigorous methodologies to present a balanced and comprehensive overview of potential noise impacts. Although the BLM respects Mr. Rand’s professional expertise, the assessments and projections from the noise technical report align with best practices and widely recognized standards, ensuring both environmental and human welfare.
11535-108	Steven Andersen	The American National Standards Institute (ANSI) S12.9 Parts 4&5 provide siting criteria for compatibility of unfamiliar intrusive noise in various land uses. 3.4 ANSI S12.9 Parts 4&5 establish that for quiet rural areas, unfamiliar intrusive noises are incompatible when their average nighttime noise levels exceed 35 dBA. The DEIS failed to take a hard look at rural residences and noise sensitive land uses nor identify where the noise sensitive	The project noise technical report (SWCA 2022) takes into account the quieter background noise levels typical of rural areas, and the BLM has strived to ensure that our predicted noise levels are in line with appropriate standards.

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		land uses are, nor assess compatibility with those uses, nor mitigation. When assessed using ANSI standards for noise compatibility, the facility falls into “incompatible development” status at multiple rural residences.	According to the American National Standards Institute (ANSI) S12.9 Part 5, land use is considered compatible when the annual average of the total day-night adjusted sound exposure or the annual average of the adjusted day-night average sound level at a site does not exceed the compatibility limit designated for that land use (ANSI 2007). Our approach to evaluating noise impacts is conservative and aims to provide a worst-case scenario assessment. The maximum noise levels reported in the project noise technical report (SWCA 2022) assume that all wind turbines will operate at the worst noise conditions, generating the highest possible noise levels. This scenario forms the basis of our calculations and is used to assess the potential impacts. However, wind turbines do not continuously operate at this noise level. Their operation is dependent on several variables, such as wind speed, direction, and atmospheric conditions, which fluctuate over time. Therefore, the worst-case scenario used for the calculations is unlikely to occur continuously over an entire year. The actual noise levels experienced at residential receptors over an annual average are likely to be considerably lower than our conservative estimates. Therefore, when considering the ANSI S12.9 Part 5 standard based on an annual average, the project will likely be even more compatible with local land uses than our worst-case scenario assessment suggests. Additionally, it is important to note that the ANSI standards are guidelines rather than legally enforceable limits. Although they are taken into consideration, the legally enforceable noise limits are typically set at the local or state level. See response to comment 11535-112 (see in Table A-3r, Noise) for information on local noise limits. American National Standards Institute (ANSI). 2007. Quantities and Procedures for Description and Measurement of Environmental Sound – Part 5: Sound Level Descriptors for Determination of Compatible Land Use, ANSI/ASA S12.9-2007/Part 5.
11535-109	Steven Andersen	The DEIS fails to conduct an analysis of projected noise levels compared to pre-existing background sound levels for assessing noise impacts and likewise fails to consider community response to intrusive noise (see ANSI S12.9).	In the absence of direct measurements, the conservative approach used estimates from the literature to define the pre-existing noise levels. It recognized the lack of significant existing noise sources define the siting corridors as very quiet suburban and rural residential areas (Category 6, according to ANSI 2013 standards). The BLM considers findings from EPA (1971), which estimated that ambient values in sagebrush habitats during calm nights and mornings are likely to be between 16 and 22 dBA. Also, studies from Patricelli et al. (2013) and Lynch et al. (2011) suggested similar noise levels in wilderness areas and U.S. National Parks, respectively. Based on these findings, the Leq nighttime and daytime noise levels were assumed to be 34 and 40 dBA, respectively, at the residential communities, and 22 and 16 dBA, respectively, at unoccupied open rangeland. These assumptions allowed us to make a worst-case estimate of the potential noise impact from the wind turbines. American National Standards Institute (ANSI) and Acoustical Society of America (ASA). 2013. *Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-term Measurements with an Observer Present*. ANSI/ASA S12.9-2013/Part3. Lynch, E., D. Joyce, and K. Fristrup. 2011. An assessment of noise audibility and sound levels in U.S. National Parks. *Landscape Ecology* 26:1297–1309. Patricelli, G., J.L. Blickley, and S.L. Hooper. 2013. Recommended management strategies to limit anthropogenic noise impacts on greater sage-grouse in Wyoming. *Human-Wildlife Interactions* 7(2):230–249.
11535-110	Steven Andersen	Also, the DEIS fails to assess predicted noise levels exceed sleep disturbance thresholds below the limit at nearby rural residences in Noise Sensitive Areas (“NSA”), like that of the proposed project.327 As noted by Rand, based on ANSI and TC/43 guidelines, facility intrusive noise levels in NSAs are well above 18dB over the background, “guaranteeing disturbance, complaints, destruction of acoustic amenity, sleep disturbance at Residence 113 and sleep interruptions at other residences…."	Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA 1974) specifies that maintaining an outdoor noise level of 55 dB Ldn will result in an indoor noise level of about 40 dB Ldn with windows partly open for ventilation. According to the EPA, managing environmental noise to maintain an outdoor Ldn of 55 dB is crucial. This level of sound is considered to be balanced and acceptable for a healthy living environment, especially considering the transition from outdoor to indoor spaces. With windows partially open for ventilation—a common scenario in residential settings—the indoor Ldn is projected to be approximately 40 dB. This calculation is based on the expected noise reduction due to the physical barrier of the building, including the walls and windows. At these levels, the noise should be adequately low to safeguard against sleep disturbances, ensuring a peaceful resting environment for most individuals. In the context of the predicted noise levels at Residence 113 (42.2 dBA day, 42.2 dBA night, 48.6 Ldn), it is clear that these levels are well within the EPA’s recommendations for preventing sleep disturbance. Furthermore, the sound levels from the project, even at the highest estimated values, are expected to be less than the 55 dB Ldn recommended by the EPA for outdoor noise levels, indicating that the project is designed to fall within levels deemed acceptable for residential areas. It is important to clarify that these values are estimated based on worst-case scenarios (i.e., the turbines producing the maximum amount of noise possible, which is an unlikely a continuous occurrence). Most of the time, actual noise levels should be lower, further reducing the potential for sleep disturbance. U.S. Environmental Protection Agency (EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safey. No. 550/9-74-004. Available at: https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.TXT?ZyActionD=ZyDocument&Client=EPA&Index=Prior+to+19

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11535-111	Steven Andersen	The noise impacts on indigenous lands and the environment at national historic sites with noise sensitive land uses run contrary to the purpose of plans designed to protect the intrinsic and historic value with so much deep meaning. The Report finds significant impacts on low-income and minority populations, notably the Japanese American community and Native American Tribes: As noted by Mr. Rand, there is no reliable noise control option for these significant impacts. Further, the noise impacts listed the Report assume the predictions are accurate and worst-case; however, wind turbine sound levels have been found to run 5-8 dB above predicted levels329, and again, we do not know the model of the turbines and such massive turbines have never been constructed on land.	In the comprehensive noise study, we followed robust protocols for sound modeling, incorporating representative wind turbine models and the unique topography of the area. We also assume a worst-case scenario analysis, assuming maximum turbine output that is infrequent in practice. We are aware of the concern that actual turbine noise can exceed predicted levels. However, our model has been designed to be as inclusive and realistic as possible, while also providing a conservative estimate for precaution.
11535-112	Steven Andersen	Further, the DEIS appears to ignore requirements for compatible development in County laws, including but not limited to, Jerome City Code 9.32.020, which sets forth county Noise Regulations and Minidoka County Ord. 2016-09-13-F, 9-13-2016 (building regulations for Wind Turbine Systems).	While local governments do not have jurisdiction over the system of public lands, meaning that the cited Jerome City Code and Minidoka County Ordinance do not technically apply to uses on public lands, we have nonetheless strived to ensure our project's compatibility with local norms and standards. Jerome City Code 9.32.020: The noise analysis undertaken for this project has considered worst-case scenarios, taking into account times when all turbines are operating at the highest possible noise levels. This analysis predicts that the maximum noise levels at residential receptors are 42.2 dBA day and 42.2 dBA night, both of which fall below the county's limit of 65 dBA. These values are not expected to create sound that is "plainly audible" within any place of residence not the source of the sound or plainly audible upon a public right of way or street at a distance of 100 feet or more from the source of such sound. Therefore, the project is in compliance with Jerome City Code 9.32.020. Minidoka County Ordinance 2016-09-13-F: The ordinance specifies that the level of noise produced during wind turbine operation should not exceed 65 dBA, measured at the boundaries of all adjacent parcels that are owned by non-participating property owners. As mentioned above, the predicted maximum noise levels are well below this threshold. Therefore, the project also complies with the noise requirements stipulated by Minidoka County Ordinance 2016-09-13-F.
11535-113	Steven Andersen	Moreover, there is serious concern that the cumulative impacts from the project, as proposed, will create a Nuisance and Public Nuisance under Idaho law.	In the context of this project, we have conducted multiple comprehensive studies, including noise impact assessments, to anticipate the project's cumulative impacts based on worst-case scenarios. According to these studies, even under the highest noise-generating conditions, the projected noise levels remain within acceptable ranges. Moreover, it is worth emphasizing that these noise levels are consistent with the guidelines proposed by the EPA in Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA 1974). The EPA identifies levels of 55 dB outdoors and 45 dB indoors as thresholds that prevent activity interference and annoyance. While local governments do not have jurisdiction over the system of public lands, we have nonetheless strived to ensure our project's compatibility with local norms and standards. See response to comment 11535-112 (see in Table A-3r, Noise) for information on local noise limits.
11535-114	Steven Andersen	It should be emphasized that very little, if any, regard was placed in the DEIS for setbacks from private residences and farm operations.	See EIS Appendix 4 (Mitigation), applicant-committed measure 25: "MVE would use appropriate setback distances for turbine placement to minimize potential impacts to surrounding residences and occupied buildings. MVE would follow industry standard values for these setback distances."
11535-115	Steven Andersen	The internationally accepted standard to ensure consistent and comparable measurements of utility-scale wind turbine sound power levels is the International Electrotechnical Commission IEC 61400-11 Standard: Wind turbine generator systems – Part 11: Acoustic noise measurement techniques [IEC, 2002]. All utility-scale wind turbines available today in the US comply with IEC 61400-11. The standard requires measurements of broad-band sound, sound levels in one-third octave bands and tonality. These measurements are all used to determine the sound power level of the wind turbine at the nacelle, and the existence of any specific dominant sound frequencies. Measurements are to be made when the wind speeds at a height of 10 m (30 ft) are 6, 7, 8, 9 and 10 m/s (13-22 mph). Manufacturers of IEC-compliant wind turbines can provide sound power level measurements at these wind speeds as measured by certified testing agencies. Measurements of noise directivity, infrasound (< 20 Hz), low-frequency noise (20-100 Hz) and impulsivity (a measure of the magnitude of thumping sounds) are optional. In the U.S., although no federal noise regulations exist, the U.S. Environmental Protection Agency (EPA) has established noise guidelines. Tests should include the following: • Ambient Background Levels: Ambient sound levels vary widely and are important for understanding the noise as well as complying with ambient-based regulations. Background sound pressure levels should be measured for the specific wind conditions under which the wind turbine will be operating. • Source Sound Levels: In order to calculate noise levels heard at different distances, the reference sound levels need to be determined. The reference sound level is the acoustic power being radiated at the source, and is not the actual sound pressure level as heard at ground level. Reference sound levels can be obtained from manufacturers and independent testing agencies. Field testing of the actual wind turbine to be installed should be required, under the same wind speed, shear, and weather conditions expected at the proposed site. Testing should include measurement at up	A noise impact assessment requires a multidimensional approach, including capturing source sound levels, and the application of sound propagation models. In line with this, we have used SoundPlan software to model the noise impacts of the project. SoundPlan is an advanced and highly sophisticated tool for noise propagation modeling and incorporates several important factors. First, it accounts for ground absorption, which is an essential element of accurate noise modeling. Different types of ground surfaces (e.g., grass, water, buildings) absorb sound differently, and SoundPlan models this effect. Second, it also accounts for source characteristics. This means that the software uses source-specific noise data—in this case, noise data specifically from the type of wind turbines that will be used. These source data include factors such as height and the specific sound power levels of the turbines. The noise spectra used to characterize the noise from the wind turbines was based on acoustic noise measurements complying with the IEC 61400-11 Standard. Weather conditions, which have a significant effect on noise propagation, are also included in the SoundPlan model. These can include temperature, humidity, and wind direction. Specifically, in our case, the model always assumes wind direction is downwind of the receptor to provide a conservative estimate of potential impacts.

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		to 2km with boundary layering in effect (usually evening-night), measuring turbine noise infrasonic, low-frequency, and impulsive characteristics using wide-bandwidth instrumentation. • Sound Propagation Model: Sound propagation is a function of the source sound characteristics (directivity, height), distance, air absorption, reflection and absorption by the ground and nearby objects and weather effects such as changes of wind speed and temperature with height. One could assume a conservative hemispherical spreading model or spherical propagation in which any absorption and reflection are assumed to cancel each other out. More detailed models could be used that include the effects of wind speed and direction, since sound travels more easily in the downwind direction; however, a conservative model will assume that all directions are downwind at some time. • Comparison of Calculated Sound Levels with Baseline Sound Levels: Calculated wind turbine sound levels do not include the additional background ambient sound levels. The mathematical relationship governing the addition of dB(A) levels require that if the turbine sound level is no more than 9.5 dB(A) above the ambient noise level, then the total noise levels will be within 10 dB(A) of the ambient sound level.332 The modeling relied on in the DEIS was inadequate and still concluded audible impacts would be widespread.	
11535-116	Steven Andersen	Further, pollution in the form of vibrations should be similarly modeled. A study published by the Department of Energy discussed the complicated system of wind turbines and how, during its use, variable loads resulting from gusts of wind affecting both the rotor blades, as well as the tower and nacelle are transferred to the foundation slab and further to the ground. The significant blade tip speeds and rotor operation in the air jet are a source of noise, while the centrifugation of huge masses, including the rotor and shafts, is a source of vibration and noise. The vibration and noise is primarily infrasound that can penetrate through concrete partitions and impact humans and animals, exposing their tissues and blood vessels to damage.	While it is true that wind turbines do produce vibrations, these are typically at a very low level, particularly when compared to many other human-made sources such as traffic, construction, or industrial machinery. Research indicates that the level of vibrations produced by wind turbines is well below the perception threshold for humans, even for those living in close proximity to a turbine. The wind turbines will be sited at a sufficient distance from residences and sensitive areas to minimize potential impact. Vibrations, unlike noise, decrease substantially with distance and are unlikely to be perceptible or cause any issues at typical setback distances. Additionally, modern wind turbine design has improved significantly over the past decade. Manufacturers now employ various vibration damping techniques to reduce the vibratory response of the components and the structure, subsequently reducing the transmission of these vibrations to the ground.
11667-3	Alisa Bowman	Concern: Sound The sounds emitted by the towers have not been studied for the effects they will have on the wildlife in the area. The frequency that humans detect is not the same as the frequency that animals detect. There needs to be more research done on this subject before any decision could possibly be made.	See response to comment 11359-1 (see in Table A-3r, Noise).
11678-1	Sue Page	ttps://video.wind-watch.org/refrigerator.mp4 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fvideo.wind-watch.org%2Frefrigerator.mp4&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C55d5e2b386c74c988af308db40f133f7%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638175176922766635%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=1MzFyfzysfeuBqo5hIVleAFtPoYBKPiz5SHZurWIXvw%3D&reserved=0> Dear Receiptants, [...] The environmental study doesn't appear to address the noise pollution 400 wind turbines will cause. Attached is a video I hope you will listen to. There are only a few turbines in the video so you'll have to imagine how much louder 400 of these beasts will make. The noise will certainly scare our wildlife but how far will that sound resonate? To the nearby residents of Eden? Valley schools? The Minidoka National Historic Site will be affected, greatly. The peace will be disrupted by the loud noise and blinking lights. There isn't any way to stop the noise pollution except to not build these turbines.	It is important to note that the sound generated by a single turbine does not simply multiply with the number of turbines. Sound does not add linearly, so 400 turbines would not be 400 times louder than one turbine. Instead, the sound increases logarithmically, meaning that doubling the number of identical noise sources will increase the sound level by about 3 dB, which is barely perceptible to the human ear. The computer software used for the noise modeling, SoundPlan, does indeed take into account the cumulative sound levels from all the turbines in the proposed development. It factors in many variables such as the distance from the turbines to various points of interest (e.g., residential areas, schools, historic sites), the specific noise output characteristics of the turbines, the local topography, ground absorption characteristics, and prevailing weather conditions. See response to comment 11359-1 (see in Table A-3r, Noise).
11871-33	WildLands Defense	“Noise Characteristics of Wind Turbines Wind energy expansion, especially on land, has also been discussed in the context of potential health concerns for humans. Several items have been raised in that context, but the main problem relates to sound, especially low-frequency and infrasound exposure. Wind turbine sound has several special characteristics. It can propagate relatively freely, as it is generated at higher altitudes than surrounding obstacles. Wind turbine sound includes low-frequency (20–200 Hz) and infrasound (below 20 Hz) waves, which have practically zero attenuation due to atmospheric absorption, whereas natural or built structures have a much lower impact on their propagation compared to waves at higher frequencies. At high distances, long-wave sound decreases almost exclusively according to geometric principles; if the distance doubles, the sound energy is distributed (and thus diluted) over four times the area. Accordingly, the noise level drops by six decibels (dB). Noise from wind turbines is not abated at night, as opposed to, e.g., traffic noise. The noise emission from wind turbines mainly depends on wind conditions (ignoring the effect of ice accumulation on rotor blades extensively discussed in [64]. Under similar weather conditions, sound emission remains the same, regardless of the time of year. In addition, the sound originating from blade rotation is regularly variating/intermittent and typically described as distinctive swishing or thumping. Further detail can be found in [65,66]”. Also: “The conscious hearing threshold for the infrasonic range starts at approximately 80 dB and extends to more than 100 dB for lower frequencies. However, the thresholds for potential health concerns are considerably lower [67], with the Swedish EPA (Naturvårdsverket) noise level guidelines suggesting that equivalent (A-weighted) noise levels must not exceed 40 dB(A) in residences. Regarding the higher hearing thresholds, the measurements from Finland indicate that infrasound is strong enough to approach or even exceed even these thresholds”. “A total of 5% of all respondents (70 individuals) reported symptoms that they intuitively associated with wind turbine infrasound (termed “symptomatic respondents” in the report). In the closest-distance zone, the prevalence was 15% (34 individuals). Of the symptomatic respondents, 49% (34 individuals) reported ear symptoms (for example, pressure sensations in the ear or tinnitus); 45% (32 individuals) reported sleep disturbance; 26% (18 individuals) reported cardiac symptoms (for example, arrhythmia); 24% (17 individuals) reported headache; 21% (15 individuals) reported dizziness; 13% (9 individuals) reported anxiety; 9% (6 individuals) reported fatigue, high	The BLM acknowledges the information presented and would like to address your concerns with respect to our analysis and the wider context of wind turbine sound, particularly concerning low-frequency noise (LFN) and infrasound. It is well-acknowledged that wind turbine noise is different from other types of environmental noise, both in terms of its frequency components and its temporal patterns. As you rightly pointed out, wind turbine noise can propagate freely, has distinctive characteristics, and does not abate at night. The BLM also recognizes the special considerations associated with low-frequency and infrasound propagation. While wind turbines do produce LFN and infrasound, it is crucial to differentiate between sound that is measurable and sound that is perceptible or harmful to humans. Based on our modeling and the manufacturer’s comprehensive frequency data, the LFN levels modeled for the maximum impacted residential receptor range from 1.6 to 23.0 dB. To put this in context, these levels are well below the conscious hearing threshold for infrasonic range, which starts at approximately 80 dB, as mentioned in your comment. Thus, the LFN produced by the wind turbines in this project is not expected to be perceivable by the average human ear. Regarding health concerns related to LFN and infrasound, the BLM notes the studies and their findings mentioned in your comment. However, it is essential to emphasize that our analysis indicates that the LFN levels from the wind turbines are substantially below those thresholds. As such, while certain studies might show health effects at higher levels of LFN or infrasound, the projected levels from our project are not expected to result in such effects. Our noise impact analysis has been conducted adhering to local ordinances and regulations. While there are no specific guidelines targeting LFN for this project, we have ensured a holistic analysis by leveraging the manufacturer’s full frequency spectrum data in our assessment. The software employed, SoundPlan, is designed to encompass low-frequency noise considerations.

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		blood pressure or joint and other aches; and 7% (5 individuals) reported nausea or difficulties in concentrating (data not shown here) [65]. Similar results were reported in a survey data collected in Germany [66]".	
11871-77	WildLands Defense	SWCA Lava Ridge Noise Study Concerns The SWCA report states: "Over the last decade, interest in understanding noise impacts on wildlife has been increasing rapidly. Recent research has demonstrated that noise can cause avoidance, flight, altered communication, reduced pair-bonding, reduced breeding success, increased stress, increased mortality in some species, and no effect or even the opposite effects in other species (Patricelli et al. 2013). Many of these behavioral and physiological impacts could occur at or below the 10-dB threshold. Further studies are needed on sage-grouse to determine whether the 10-dB threshold is insufficient, sufficient, or even too conservative (Patricelli et al. 2013). But the report goes on to try to mask understanding adverse impacts, and conduct analysis in a way that does not reflect what humans and animals actually perceive and experience, and effects of chronic noise exposure from turbines, substations, etc. An increase in sound level 10 dba = DOUBLING of the sound. • Source. The sources of sound are any generators of small back-and-forth motions (i.e., motions that transfer their motional energy to the transmission path where it is propagated). The acoustic characteristics of the sources are very important. Sources must generate sound of sufficient strength, approximate pitch, and duration so that the sound may be perceived and can cause adverse effects, compared with the natural ambient sounds. • "Transmission path" or medium. The "transmission path" or medium for sound or noise is most often the atmosphere (i.e., air). For the noise to be transmitted, the transmission path must support the free propagation of the small vibratory motions that make up the sound. Atmospheric conditions (e.g., wind speed and direction, temperature, humidity, precipitation) influence the attenuation of sound. Barriers and/or discontinuities (e.g., existing structures, topography, foliage, ground cover, etc.) that attenuate the flow of sound may compromise the path. For example, sound will travel very well across reflective surfaces such as water and pavement but can attenuate across rough surfaces (e.g., grass, loose soil). • _Proximity to NSAs. An NSA is defined as a location where a state of quietness is a basis for use or where excessive noise interferes with the normal use of the location. For this analysis, NSAs include residential areas, schools, sage-grouse leks, and raptor nests. The SWCA report uses an old out-dated Forest Service wildlife noise analysis from 2011. "U.S. Forest Service guidelines mention a noise threshold for wildlife impacts, stating not to exceed 10 dB above the background noise level "in or near habitat of wildlife known to be sensitive to noise during reproduction, roosting, or hibernation; or where habitat abandonment may be an issue". The SWCA impacts area is much too small: The SWCA report refers to noise impacts to Sage-grouse: There is evidence that noise from traffic has a significant impact on sage-grouse. Blickley et al. (2012) found a 73% decline in male attendance on leks exposed to traffic noise compared to their paired controls. Traffic noise also was also found to cause an increase in stress hormone levels (Blickley et al. 2012) and a disruption of strutting patterns on the lek (Blickley et al. 2012). Estimated noise impacts from traffic at the closest occupied lek (approximately 3.1 miles from access road) was estimated to be 25.2 dBA for a traffic level of 400 vehicles per hour.	Noise impacts can indeed vary across different species and environments, and chronic noise exposure can certainly be a concern. The project noise technical report (SWCA 2022) and the EIS have considered these factors. However, the specific threshold for significant noise impacts on wildlife such as sage-grouse is not definitively established. Regarding your comment on the impact area, the project noise technical report (SWCA 2022) has employed a conservative approach in defining the impact area, considering not just the immediate vicinity of the project but also areas farther away where sound may propagate under certain conditions. It is also considering sensitive locations, like sage-grouse leks and raptor nests, to ensure appropriate measures are taken to minimize impact. With respect to sage-grouse, it is worth pointing out that traffic noise, as investigated in the Blickley et al. (2012) study, is different in character from wind turbine noise and may be more disruptive to sage-grouse behavior.
11871-78	WildLands Defense	Blasting noise "within 300 ft of sensitive receptors – there has not been adequate analysis if sensitive receptors, seasonal differences in noise transmissions, etc.	To address this concern, the EIS does consider potential impacts from blasting activities. As mentioned, blasting operations would likely be necessary for clearing, grading, and excavation activities in areas with shallow bedrock. However, it is important to note that these activities are short term and would only occur during the construction phase of the project. Regarding the noise levels, our assessment indicates that the typical noise generated by blasting operations would be about 94 dBA at a distance of 50 feet, based on Federal Highway Administration (FHWA) data. With this level, at a distance of 0.5 mile to the closest residential receptor, the maximum noise level would be around 59.5 dBA, and at a distance of 3.1 miles to the nearest occupied sage-grouse lek it would be around 43.7 dBA. Although these levels are above the ambient noise levels, the duration of such noise is very brief and intermittent, which helps to limit the overall noise exposure. Furthermore, all blasting activities would adhere to the Blasting Plan Methodology (Appendix I in MVE [2023]), designed to minimize adverse impacts.
11871-79	WildLands Defense	5.2 Operational Noise: The noise levels at the identified NSAs in the vicinity of the project from the representative wind turbine generator model have been predicted for the highest sound power level (108 dB) at a wind speed of 9 meters per second (m/s) and compared with the relevant noise criteria, including the EPA's Ldn of 55 dBA at residential NSAs and 10 dBA above background levels at sage-grouse leks or raptor nests (as provided in Section 3.4). Additionally, transformers at the proposed substations were also included in the analysis . A word search of the noise report unearths not a single peep about infrasound and/or ultrasound generated by any structure or device foreseeably used on the site. There is no analysis of all the different frequencies emitted by turbines, potential differences in frequencies between turbine types, differences in sound frequency propagation at different elevations and different.	Our sound level analysis does indeed take into account a wide spectrum of frequencies, from 16 Hz to 8000 Hz. The decision to focus on this range is based on typical frequency ranges produced by wind turbines, and it includes both low frequency (infrasound) and audible sound ranges. Ultrasound frequencies, which are typically above 20,000 Hz, are generally not produced in significant levels by wind turbines. The noise modeling software, SoundPlan, which we have used for the analysis, uses input data that includes the sound power level and frequency spectrum for the turbine model under consideration. This spectrum reflects the different sound levels emitted by the turbine at different frequencies, providing a comprehensive representation of the noise that would be produced by the turbine operation. The sound power level used in our analysis, 108 dB at 9 m/s wind speed, is the highest sound power level emitted by the chosen turbine model. This was chosen to provide a conservative estimate of potential noise impacts. For each sensitive receptor (residential areas, sage-grouse leks, raptor nests), we compared the modeled sound levels with the relevant noise criteria, including the EPA's Ldn of 55 dBA for residential areas and 10 dBA above background levels for sage-grouse leks and raptor nests. In the case of substation transformers, they were also included in our noise analysis to ensure all potential significant noise sources were accounted for.

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11871-81	WildLands Defense	SWCA estimates used 3 MW turbines, with noise up to 108 decibels. Hub height 98 meters. Noise impacts were estimated at height of 1.5 m. AGL. But what about Burrowing Owl and other species at ground level? What about noise transmission outward at turbine height – what are these levels, and how does this impact bats and other volant species? Don't different types/designs/brands of turbines and turbine parts emit different frequencies – including ultrasound??If so, how do they differ, and what are the ranges?	Regarding the noise transmission at ground level, our analysis did indeed take this into account. Although noise impacts were estimated at a height of 1.5 m AGL, this height is typically used as a standard measurement height for noise assessment, as it represents the typical height of human ears. However, the SoundPlan software used considers noise propagation in a three-dimensional model, which would include both higher and lower levels. Certainly, it is important to clarify that a 1.5-m difference between the modeled receiver height and the actual ground level is indeed not significant in the context of this noise analysis. This is due to the substantial distances between the noise sources (wind turbines) and the receptors being considered. Sound propagation diminishes with distance following the inverse square law, meaning that the intensity of sound decreases significantly with increasing distance from the source. Given the substantial distances between the turbines and the receptors in this study, a vertical adjustment of 1.5 m would not substantially affect the sound pressure level experienced at the receptor location. In the grand scheme of the noise model, this difference is minute and does not substantially influence the overall noise impact findings. This means that the noise impact at ground level was considered.
11871-82	WildLands Defense	Tus report is like something from 20 years ago, and is woefully out of step with current concerns and ever-mounting adverse impacts being experienced by residents and animals exposed to industrial wind facilities. See: https://www.nature.com/articles/s41598-021-97107-8 . "Wind turbines generate low-frequency noise (LFN, 20–200 Hz), which poses health risks to nearby residents. households built with concrete and equipped with airtight windows showed the highest LFdifference of 13.7 dB between indoors and outdoors. In view of the adverse health impacts of LFN exposure, there should be regulations on the requisite distances of wind turbines from residential communities for health protection. Effects of low-frequency noise from wind turbines on heart rate variability in healthy individuals Chun-Hsiang Chiu1, Shih-Chun Candice Lung1,2,3*, Nathan Chen1, Jing-Shiang Hwang4 & Ming-Chien Mark Tsou1. Wind turbines generate harmful low-frequency sounds. Also: https://www.sciencedirect.com/science/article/pii/S0013935120312573	Thank you for sharing these studies and expressing your concerns. The project noise technical report (SWCA 2022) is grounded in the most recent accepted standards for wind turbine noise assessment, employing state-of-the-art procedures for modeling and analysis. The BLM has considered the information presented in the articles provided. Specifically, the study from nature.com investigated settings with a distance of 500 m from turbines. In our analysis, the setbacks from residences are considerably greater than that, which can influence the extent of potential low-frequency noise exposure. Furthermore, a preliminary review of the same study indicates that during the summer, indoor exposure to LFN was attributed more to factors such as fans and indoor conversations rather than wind turbines, suggesting the need for a nuanced interpretation of the findings. Although the BLM respected the ongoing discussions and evolving research in this domain, especially regarding potential impacts on humans and wildlife, our primary objective remains to deliver an accurate and comprehensive assessment that aligns with current scientific consensus.
11978-31	Magic Valley Energy, LLC	27. The DEIS states: "An NPS model predicted mean noise levels in 2015 (including the average existing sound level with the influence of human-made sounds) at Minidoka NHS to be 6.0 dBA above the natural ambient sound level (NPS 2015). The results of the noise impact assessment (SWCA 2022a) indicate that operational noise levels near Minidoka NHS would range from 7.1 to 12.1 dBA above existing background levels…" a. MVE Comment: The terms "existing background" and "natural ambient sound" appear to be used interchangeably in the DEIS; however, when reviewing the two reports (NPS 2015 and SWCA 2022a) in detail, the analyses use two drastically different values for background sound levels, with NPS 2015 using 25 dBA and SWCA 2022a using 19.3 dBA. This may misinform the reader on the level of impact by creating an "apples to oranges" basis for comparison of sound impacts. A more accurate way to estimate the Project- related noise impact is to compare the existing sound levels at Minidoka National Historic Site (Minidoka NHS) to the estimated sound levels at Minidoka NHS during operation of the Project. According to Figure 3 of NPS 2015, the Minidoka NHS median existing sound level ranges from 31.3 to 32.5 dBA. According to Figure D-2 of SWCA 2022a, the Project alone (as Alternative B) would have an operational noise level at Minidoka NHS that ranges from 22 to 28 dBA. Since sound is additive, the total noise impact to Minidoka NHS is calculated by combining the existing sound levels at Minidoka NHS with the Project's operational noise. The following equation can be used to add two sound levels of differing dBA values, with $Ltotal$ being the total sound level, and $L1$ and $L2$ representing the two sound levels: [see following equation in pdf letter to show fractions, exponents, and subscripts] $L1$ $L2$ $Ltotal$ = 10 $* log10(1010 + 1010)$ To calculate the maximum impact, MVE used the lower end of the range from the Minidoka NHS existing sound level (31.3 dBA) for $L1$ and the maximum Project operational noise level (28 dBA) for $L2$. The resulting $Ltotal$ is 32.97 dBA. Therefore, the Project's maximum impact to Minidoka NHS will increase the existing noise from 31.3 dBA to 32.97 dBA. This equates to an increase of 1.67 dBA. SWCA 2022a notes that an increase in noise of 0-3 dBA is a barely perceptible to the human ear. This calculation considers sound values from Alternative B. Alternatives C, D, and E would result in even lower noise impacts. Since the maximum noise impacts for all Alternatives would be unnoticeable, MVE requests the FEIS reflect this conclusion and state that there will be no noise impacts at Minidoka NHS by the Project.	Because no site-specific noise monitoring was conducted for the analysis area, the EIS provides a discussion of results from both SWCA (2022) and NPS (2015). The BLM uniformly applied 19.3 dBA as the ambient sound level for the entire analysis area (this is the estimated level for rangeland unpopulated areas). This is a different baseline than used in NPS (2015); the NPS used 25 dBA plus 6 dBA as noted in the comment, for an estimated 31 dBA existing baseline sound level. Although existing baseline sound levels surrounding the siting corridors may be higher than 19.3 dBA (including those reported in NPS 2015), without site-specific monitoring results, the BLM conservatively used the lower ambient sound level in the noise technical report (SWCA 2022) and EIS analysis. See Figure D-2 in Appendix D of the SWCA (2022), Operational noise at residential receptors and schools. The EIS the used the outer edge of the modeled operation isopleths, as the distance from the turbines at which sound level would be <22 dBA; this distance is 2.2 miles from the turbine locations.
12177-2	Carol A. Overland	NOISE MODELING USING OTHER THAN 0.0 GROUND FACTOR IS MISLEADING Noise information presented in the DEIS is misleading because potential for noise impacts is grossly understated due to use of improper ground factor in noise modeling. First, regarding noise, the DEIS states: The average person perceives an increase in sound of above 3 dBa as readily noticeable, an increase of 10 dBa as doubling of the sound, and an increase of 20 dBa as a dramatic change (SWCA 2020a)… … a sound level of 60 dBa would be representative of normal conversation… DEIS, p. 3-145 and 3-146 (emphasis added). This focus is "perception," but a 3 dB(A) is a doubling of sound. Normal conversation is close and direct, noise from a wind turbine in Minnesota is prohibited above 50 dB(A)5, and in Wisconsin, 45 dB(A). [see pdf letter for image and sources] An NPS model predicted mean noise levels in 2015 (including the average existing sound level with the influence of humanmade sounds) at Minidoka NHS to be 6.0 dBA above the natural ambient sound level (NPS 2015)… … The results of the noise impact assessment (SWCA 2022a) indicate that operational noise levels near Minidoka NHS would range from 7.1 to 12.1 dBA above existing background levels and would range from 3.7 to 15.7 dBA above existing background levels from within Minidoka WRC (see Section 3.6 regarding Noise impacts on the	ISO 9613-2: Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation provides a comprehensive methodology for predicting sound levels in outdoor environments. This includes atmospheric absorption, ground effect, surface reflection, and diffraction over barriers. Ground effect (or ground attenuation) refers to the changes in sound propagation due to interaction with the ground surface. Ground effect is influenced by several factors, including the type of ground cover, the distance between the source and receiver, the heights of the source and receiver, and the sound frequency. ISO 9613-2 calculates ground effect based on an "excess ground attenuation" term. This term depends on the geometric configuration of the source, receiver, and ground reflection point, as well as the acoustical properties of the ground surface. The ground surface is characterized by a ground factor, "G," which ranges from 0 (for a perfectly reflective, hard ground) to 1 (for a perfectly absorbent, soft ground). The value of G to use for a given ground surface can be determined from the guidance provided in the standard or other literature.

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		Japanese American community). As noted in Section 3.6, these operational noise levels are all below the EPA's recommended noise standard of 55 dBA for residential land uses. DEIS, p. 3-157-158. Attached as Exhibit D please find a Comment I filed in a Minnesota Power Plant Siting Act hearing docket, raising the issue of misuse of ground factor. Misuse in modeling is use of a ground factor of other than 0.0 for an elevated source. The use of a 0.0 ground factor in modeling an elevated noise source has been addressed in testimony in Wisconsin dockets by two noise experts, that 0.0 is the ground factor to be used. The 0.0 ground factor for elevated sources is necessary because for an elevated noise source, the path to "receptors" is uninterrupted, it's a direct line, there is no ground absorption: [see pdf letter for image and sources] The use 0.0 of ground factor for wind is standard practice, and a 0.5 ground factor is NOT appropriate for wind because it's elevated. This was inadvertently confirmed by Applicant Badger Hollow's expert Mike Hankard's testimony in the Badger Hollow solar docket before Wisconsin's Public Service Commission (PSC Docket 9697-CE-100): [see pdf letter for image and sources] The use of a 0.5 ground factor is only appropriate for modeling predicted noise impacts for a ground source to a receptor on the ground to address muffling interference in between: [see pdf letter for image and sources] The introduction of ISO 9613-2, attached in full as Exhibit E, explains this simply: 7 .3 Ground effect (Agr} 7 .3.1 General method of calculation Ground attenuation, Agr• is mainly the result of sound reflected by the ground surface interfering with the sound propagating directly from source to receiver. Exhibit E, ISO 9613-2. The DEIS' Noise Technical Report, at page 18, claims a definition of ground factor i elevated source noise modeling. Dr. Schomer, who was part of committee that developed the ISO 9613-2 noise modeling standard, had an even more specific explanation, this from another Wisconsin wind docket. See attached Exhibit F, Schomer Testimony, pps. 569, et seq. See p. 571 of that testimony: A Yes. But to understand that is a question that was earlier. You've got a source up in the air and not on the ground, so does this standard really apply. And my answer was, it's the best we have, but you can't apply it exactly the way you would if it was on the ground because the source is as high in the air, it changes what the propagation is. So that the definition of what is hard and what is soft, you have a source that's 100 meters in the air on average. That's not on the ground as one of the other counsel's pointed out. And on p. 572: A No. It's only -- the only thing you have is an effect of the microphone height at your receiver. The other -- it doesn't -- it doesn't come down to the ground and then travel across the ground like this. It doesn't do that. What you're interested in is the path that goes straight from this up in the air source to your receiver, which may be near the ground, but you don't have any other path. If you do, it's because you don ' t have good propagation. In short, again, page 574, with an elevated source, from that source to the receptor, it's a direct hit: Q So if there's a source up in the air that's emitting sound, the sound's going to come down and it's going to hit the receptor before it hits the ground and absorbs; is that correct? A It's going to hit the receptor directly. There will be -- it gets confusing . And summing up on p. 576 of Dr. Schommer's testimony: Q But considering we have to use this model because we don't have anything better, the best way to use this model for a source that's 100 meters in the air is to use that 0.0 coefficient? A 0.00 is t he best you can do with this . Contrary to the experts' testimony, the Lava Ridge Noise Technical Report states that ground factors of the appropriate "0.0" was used, but also that the utterly unjustifiable and unsupportable ground factors of 0.6 and 1.0 were use for this elevated source! • To better represent the actual conditions of the project and to ensure that both hard and soft ground absorption were considered, acoustically hard sites, including surfaces such as pavement and bare hard ground, were asSUllled to have high reflectivity properties, and a ground absorption coefficient of0.0 was used. Ground cover near the project was analyzed using satellite imagery from Google Earth. A higher ground factor of 1.0 was defined for more absorptive ground, such as vegetation and loose soil. Semi-hard materials such as gravel were assumed to have a grom1d absorption coefficient of 0.6. See Noise Technical Report, p. 19. Noise modeling using anything but the 0.0 ground factor understates expected noise – garbage in, garbage out. Note that in the DEIS, Figure 3.5-3 confirms that there is NOTHING between the wind turbines, elevated, and the receptor on the ground: Bottom line: ... • The Noise Technical Report is garbage. The Noise Technical Report and related sections of the DEIS should be tossed out; noise modeling performed using ONLY a ground factor of 0.0, and a corrected Noise Technical Report and the DEIS revised and filed with notice and opportunity for public review and comment.	The calculation of excess ground attenuation involves a number of mathematical steps, including: • Calculating the direct and ground-reflected path lengths from the source to the receiver. • Calculating the "ray-path difference." • Using the ray-path difference, the source/receiver heights, and the ground factor G to calculate the excess ground attenuation in dB. Ray-path difference refers to the difference in distance between the direct path and the ground-reflected path from the sound source to the receiver. When sound is emitted from a source, it travels in all directions. If we consider a point source of sound and a receptor in an outdoor environment, there are generally two main paths the sound can take to reach the listener: • Direct Path: The straight-line path from the sound source directly to the listener. The length of this path depends on the positions and heights of the source and the receptor and their separation distance. • Ground-Reflected Path: This path involves the sound traveling from the source to the ground, reflecting off the ground surface, and then continuing to the listener. This path is typically longer than the direct path because the sound must travel down to the ground and back up to the listener. The difference in distance between these two paths is referred to as the ray-path difference. Differences between the direct and reflected sound waves lead to the received sound level variations. One factor in sound propagation is the ground factor, also referred to as "ground effect." This term denotes the impact of the ground or terrain on sound waves' absorption, reflection, and scattering. It plays a role in dictating how sound behaves once it has been produced, including how far it travels and how its intensity changes over distance. As described before, when a sound is produced, its waves will radiate from the source in all directions. Some waves will travel directly to the receiver, while others will interact with the ground surface. The nature of this interaction is dictated by a few key characteristics of the ground, which collectively contribute to the ground factor. One of these characteristics is the height of the source relative to the ground. This parameter becomes particularly important in situations involving large structures, such as wind turbines. The effect of the ground is most pronounced when the source is close to the ground level, as the direct path to the listener and the ground-reflected path are roughly equal in length. As the source height increases, the direct path becomes shorter and the ground-reflected path becomes longer, reducing the ground's influence. However, even for elevated noise sources, the ground still has an impact, especially over long distances. For instance, if the source is a tall structure like a wind turbine, and the receiver is closer to the ground, the sound waves from the turbine will still interact significantly with the ground before reaching the receiver. In the context of environmental noise propagation from wind farms or any other noise source, it is critical to use representative inputs in models to ensure the accuracy and reliability of predictions. Models are mathematical representations of real-world phenomena. They are designed to predict outcomes based on a set of input parameters. If these inputs do not represent the actual conditions, the model's outputs will not accurately reflect reality. The principle of "garbage in, garbage out" applies here: if incorrect or unrepresentative inputs are used, the results, regardless of how precise they may appear, can be misleading or incorrect. Take the ground factor (G) discussed before. The ground factor characterizes how much sound is reflected by the ground. Using an unrepresentative ground factor (like assuming G = 0.0 for all scenarios) can lead to a misestimation of the noise levels at the receiver's location. Therefore, a one-size-fits-all approach (i.e., G = 0.0) can produce a distorted picture of the noise impact. Moreover, the scenario modeled for this project included sources at ground level. When dealing with a mix of source heights, such as a wind farm with elevated sources like the turbine and ground-level sources like transformers, assuming a single ground factor (G = 0.0) for all sources is completely inappropriate. Like a wind turbine rotor, an elevated source primarily generates noise that travels above the ground before reaching a receiver, thus interacting less with the ground surface. Conversely, like a transformer, a ground-level source generates noise that interacts directly with the ground. In this case, the sound is significantly affected by ground absorption and reflection, which is determined by the ground factor (G). Therefore, to ensure accuracy in noise prediction models, a ground factor that accounts for the existing land cover conditions around the receptor and the source needs to be employed regardless of their height. Therefore, a noise modeling performed using ONLY a ground factor of 0.0 is completely unrepresentative of the actual conditions at the site.
12562-1	Sue Page	The environmental study doesn't appear to address the noise pollution 400 wind turbines will cause. Attached is a video I hope you will listen to. There are only a few turbines in the video so you'll have to imagine how much louder 400 of these beasts will make. The noise will certainly scare our wildlife but how far will that sound resonate? To the nearby residents of Eden? Valley schools? The Minidoka National Historic Site will be affected, greatly. The peace will be disrupted by the loud noise and blinking lights. There isn't any way to stop the noise pollution except to not build these turbines.	See response to comment 11678-1 (see in Table A-3r, Noise). The computer software used for the noise modeling, SoundPlan, does indeed take into account the cumulative sound levels from all the turbines in the proposed development. It factors in many variables such as the distance from the turbines to various points of interest (e.g., residential areas, schools, historic sites), the specific noise output characteristics of the turbines, the local topography, ground absorption characteristics, and prevailing weather conditions.

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12879-2	Norma White	Low frequency noise (LFN) First of all, what is low frequency noise? It is noise, as the name suggests, at the lower frequencies of the audible range. It is general accepted to be within 20 to 200 hertz. Less than about 20 hertz is termed infrasound, because it is not usually audible to the human ear. ILFN (Infrasound–low frequency noise) is another abbreviation I shall use, as in some instances infrasound is comparable to LFN. Noise that can be felt. Unlike higher frequency noise, ILFN is not just audible – it is also perceptible! [1] The human ear can hear infrasound down to a frequency of 12 hertz, after which it is perceived as single cycles of the sounds along with a sensation of pressure at the eardrums. [2] ... Noise that is selective in who it disturbs I quote directly from the words of Dr Geoff Levanthall in a report prepared for DEFRA in 2003: LFN causes EXTREME distress to a number of people who are sensitive to its effects… Such sensitivity may be a result of heightened sensory response within the whole or part of the auditory range or may be acquired. The noise levels are often low, occurring in the region of the hearing threshold, where there are considerable individual differences. The World Health Organization is one of the bodies which recognizes the special place of low frequency noise as an environmental problem. [6] ILFN affects brain activity. According to a study done in Britain in 2003, people were exposed to an ILFN frequency of 17 hertz during a concert: The presence of the tone resulted in a significant number (22%) of respondents reporting anxiety, uneasiness, extreme sorrow, nervous feelings of revulsion or fear, chills down the spine and feelings of pressure on the chest. [30,31] In presenting the evidence to British Association for the Advancement of Science, Professor Richard Wiseman said, “These results suggest that low frequency sound can cause people to have unusual experiences even though they cannot consciously detect infrasound. [6] ... Noise that travels very long distances. Whilst it would be expected that the ILFN would rapidly dissipate like other forms of noise over distance, one must be careful to put this into context. According to Levanthall: The attenuation of sound in air… is very low at low frequencies. Other attenuating factors, such as absorption by the ground and shielding by barriers, are also low at low frequencies. The net result is that the very low frequencies of infrasound are not attenuated during propagation as much as higher frequencies. [10] Under conditions of 20 degrees Celcius at 70% humidity, Levanthall states that noise at 63Hz will dissipate at only 0.1dB/km – i.e. negligible losses. ... However, there is another factor to consider: noise dilution over distance. The loss according to Levanthall is about 6dB for each doubling of distance. However, what happens when dealing with 140 wind turbines in the region each producing ILFN? How does this noise energy “dilute” out over distance? It clearly doesn’t follow a simple model of dissipation and instead interacts with the ILFN from other wind turbines (and other industrial sources such as open-cycle gas plants, one of which is due to be built just outside the village at Dalton). What produces ILFN? Low frequency noise and infrasound are produced by machinery, both rotational and reciprocating, all forms of transport and turbulence. For example, typical sources might be, pumps, compressors, diesel engines, aircraft, shipping, combustion, air turbulence, wind and fans. [11] What about wind turbines? Wind turbines certainly do produce ILFN. They are reverse fan mega machinery of unprecedented proportions. Such rotating machinery moves at up to 290km/h on the outer tip of the blade. The span is the same as that of a jumbo jet, and the surface area of their blades is extensive (hundreds if not over one thousand square metres in larger models). Their generator weighs tens of tonnes. Although the larger wind turbines are “quieter” machines in terms of audible noise, they instead produce more ILFN. [12] Quiet backgrounds are associated with more noise annoyance The lack of background noise makes a dominant noise source more noticeable. Whilst this appears self-explanatory to any person living in rural area, it has also been the subject of investigation. [13] The Capital and Southern Tablelands regions have no major industrial sources of noise, save traffic noise in Canberra, and the large wind turbine installations started in late 2008. But isn’t the noise level within the “guidelines”? The question is: what guidelines? There are no current guidelines on low frequency noise that I am aware of that are being applied to the wind turbine industry. In fact some wind industry proponents suggest on online sites that wind turbines do not produce infrasound, even when there is evidence to the contrary. The character of wind turbine noise is known to make it especially intrusive, arising from amplitude modulation associated with blade passage past the tower, and the dominance of low frequencies in the received sound spectrum. These are implicated in sleep disturbance and deprivation, and the resultant adverse health effects. [14] Moreover, the A-frequency weighted sound pressure level or “sound level” is the most common sound descriptor. However, the A-weighting has a significant restriction in that it does not permit measurement or assessment of low frequency sound. Noise standards need to include appropriate measures to calculate the impact of low frequency noise and vibrations indoors at impacted dwellings. ... What are the peculiarities of wind turbine ILFN? Empirically, wind turbine ILFN travels upwind almost as well as it does downwind. (NASA has confirmed this observation with smaller wind turbine models). [19] It is also more intense during atmospheric inversions (consistent with the phenomenon described by Van den Berg [20,21]) and becomes dramatically worse when the atmosphere is moist, particularly prior to major rain events. Where are we heading to with ever increasing numbers of wind turbines? That is precisely what I wish you to think about. ... Research is required to establish the nature of the problem and its solutions. Meanwhile the only responsible position is to call for a moratorium on all wind developments. It is also necessary to ask questions about giving respite to the existing sufferers, particularly those who live at close range to the wind turbines where the problem is at its worst. Wind turbines should at least be SWITCHED OFF during sleeping hours, and particularly during weather conditions which are conducive to ILFN such as inversions, or pre-rain events. Wind turbines are not “farms”. They are industrial zones that create much ILFN and consequent grief.	While it is true that wind turbines can produce LFN and infrasound, it is also important to note that not all LFN is harmful or even perceptible to humans, and the levels produced by wind turbines are often below the threshold of human perception. The noise impact analysis performed was based on the local ordinances and regulations, and as correctly pointed out, there are currently no specific guidelines regarding LFN that apply to this project. However, the manufacturer’s data for the wind turbines, which includes a full frequency spectrum from 16 Hz to 8000 Hz, was used in our analysis, thereby including low frequency components. It is worth mentioning that the modeling software we used, SoundPlan, takes into account low-frequency noise. The LFN levels modeled for the maximum impacted residential receptor ranged from 1.6 to 23.0 dB. Therefore, the LFN estimated levels are not high enough to cause health effects.
2882-1	Mark Southwick, Vicki Southwick	Noises transferred through solids like lava are not included in the research and EIS. Therefore, the current EIS is incomplete and requires additional research and time to be considered complete and accurate.	I understand your concerns about noise transferred through solids, such as geological formations, which is also known as ground-borne noise or vibration. For the operational phase of wind turbines, several studies have shown that the levels of ground-borne vibration are typically very low and usually well below perception levels for

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			humans and animals. These levels are usually much less than those generated by many other common sources, such as road traffic or even walking.
2925-1	Mark Southwick	Question 1: Where was the decibel rating for turbine noise obtained? Where are same scale turbines in operation for obtaining accurate related data? I was told the proposed turbines do not currently exist and therefore neither does the applicable data. Information from existing turbines half the size was translated and projected as accurate data for the proposed turbines. The 127.6 db reading is an estimate that comes from the proposed manufacturer of the 740' turbines, who has engineered but not produced any of those turbines. Question 2: What information did they use to establish the diminished decibel readings at the turbine base, the 2.5 mile distance and other locations they cited? Again, it was an estimate based on other criteria not researched or studied specific to LRWP's impact area, environment or proposed infrastructure. The same non LRWP specific calculations were applied to the decibel numbers associated with noise levels affecting conservation species, agricultural livestock and human habitat. Question 3: As I pass windfarm projects, it is always interesting to me how many turbines are not in operation. Information from the open house representatives indicated that wind conditions are expected to allow windmills in the project area to operate 30% of the time. How much of the remaining 70% of "dead" time is due to high winds. That observance leads me to ask the question, what research has been done to determine the noise level of 400 non operating 300' or longer turbine blades in high wind occurrences. When wind speeds are high enough that wind turbines cannot operate, the blades cut into the wind and like trees, buildings and other structures, the wind creates irritating whistles, noise and vibration at levels that are irritatingly detrimental to human and animal environments and habitat. The EIS gives an estimate of noise levels when the blades are rotating at operational speeds, but not when they are stationary with higher wind velocities. SWAC did not compile or study the days in high wind or the noise, whistles and vibration associated with static 300' turbine blades on the LRWP area of impact. Additionally, the sound transfer during turbine blade static time through underground lava would also be an area of impact research that is not included in the EIS.	You are correct in stating that projected sound levels are based on manufacturer specifications for the turbines proposed, which have not been constructed yet. This is a standard practice in wind farm planning. Sound levels are calculated based on measurements from existing, similar turbine models. This provides a reasonable and generally conservative estimate of the noise level. The noise modeling software, SoundPlan, which we have used for the analysis, uses input data that includes the sound power level and frequency spectrum for the turbine model under consideration. This spectrum reflects the different sound levels emitted by the turbine at different frequencies, providing a comprehensive representation of the noise that would be produced by the turbine operation. Wind turbines are designed to cease operation in very high winds for safety reasons. During these times, the blades are oriented in such a way to minimize wind resistance, which also minimizes the noise they produce. The whooshing noise associated with wind turbines is primarily produced by the movement of the blades, not the wind itself, so when the blades are not rotating, the noise levels are generally much lower.
3302-10	Susan Canham	Where is noise pollution addressed outside of a mere mention in regard to wildlife and cattle?	Noise impacts are addressed in the project noise technical report (SWCA 2022). Additionally, impacts on other resources are discussed in their respective sections of the draft EIS.
3990-1	Diana Nielson	In The Noise Technical Report for the Lava Ridge Project the draft EIS does not have information of the affects of Extreme Low Frequency (ELF) infrasound on wildlife or humans. The executive Summary, Abbreviations, 3. Noise Fundamentals and in 3.1 Definitions of Acoustical Terms: Infrasound and ELF is not mentioned. Also the cumulative noise on Table 6. is cut off on pages 10,11& 12. The cumulative affect is very important. Low frequency inaudible infrasound travels long distances especially when combined from several sources I am not in favor of the Lava Ridge Wind Turbine Project. Choose Alternative A A Concerned Citizen. Diana Nielson	The EIS does not currently include information on the effects of ELF infrasound. Infrasound (sound at frequencies below the human hearing range) and ELF infrasound can indeed be generated by wind turbines, although at levels significantly below the threshold for human perception. While the effect of such low-frequency sounds on human health is still under investigation, current scientific consensus generally holds that the levels produced by wind turbines do not pose a health risk. Note that the noise impact assessment was conducted based on local laws and regulations. Currently, there are no specific rules pertaining to LFN applicable to this project. That being said, we used the data provided by the wind turbine manufacturer in our analysis, which covers a comprehensive frequency range from 16 Hz to 8000 Hz, thus encompassing low-frequency components. It's important to highlight that our used modeling software, SoundPlan, does account for low-frequency noise. For the residential receptor most impacted by this project, the modeled LFN levels ranged from 1.6 to 23.0 dB. As such, the projected LFN levels are not anticipated to result in health-related concerns.
4259-1	Sheryl May	We will be living next to the desert where the wind farm will be close to our home. Our number one concern is noise from the turbines. After our research for every assurance That the decimals of noise are not destructive we find citizens living next to these wind farms, who are greatly distressed, and enormously, unhappy with the health effects from the noise. They find them selves with no recourse. They have reported such symptoms as nausea, dizziness, sensation of pressure in the air sleep disorders, headaches, and other symptoms. This is completely unacceptable. What can be done? We propose that it is required of the magic, Valley energy company by legal document. They install noise intervening machines at each turbine that is located close to feedlots dairies homes. This must be absolutely done by legal contract so that they cannot get the wind turbines installed and then walk away without devices in place to cancel the noise.	It is important to understand that various factors can influence perceived noise, including the distance between a turbine and a home, wind speed, and ambient noise levels. However, modern wind turbines are designed to be much quieter than their earlier counterparts. They are carefully engineered to minimize noise levels. While the noise-canceling technology has shown promise in controlled environments, its application to wide-scale outdoor environments is still being researched and has not yet proven to be fully effective or feasible.
4723-1	Sue Page	Any affect on human hearing will be amplified in animals. Some people who live in close proximity to wind turbines say they experience sleep disturbances, headaches and concentration problems. These symptoms and others could be explained as effects of infrasound, as well as constant humming and vibrations.	Research on the effects of wind turbine noise on human health, including symptoms like sleep disturbances, headaches, and concentration issues, suggests there is no strong evidence linking these complaints directly to wind turbines. Individual experiences can vary based on sensitivity and attitudes toward wind turbines. As for the impact on animals, reactions to wind turbines also vary greatly. Animals, like humans, vary significantly in their sensitivity to sound, depending on the species. While some animals may initially be disrupted, most adapt over time. Current research has not indicated significant impacts from wind turbine noise on terrestrial wildlife. Wind turbines do emit infrasound, which is a frequency below human perception, but at very low levels. The presence of infrasound from natural and other human-made sources in our environment is usually higher than that from wind turbines. Therefore, wind turbines are unlikely to significantly contribute to the health issues mentioned.
5189-5	Traci Wood	. What about the disruption of the 500 + days of blasting for us who live closer to the area?	In response to your concern, the EIS does take into consideration the potential effects of blasting activities. While blasting would probably be required for tasks such as clearing, grading, and excavation in areas where bedrock is near the surface, these activities are temporary and would only take place during the construction phase. As for the noise levels, our evaluation shows that blasting operations typically generate a noise level of

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			about 94 dBA at 50 feet, according to data from the FHWA. Given this, at a distance of 0.5 mile to the nearest residential receptor, the maximum noise level would be approximately 59.5 dBA, and at a distance of 3.1 miles to the closest inhabited sage-grouse lek, it would be about 43.7 dBA. While these levels exceed the ambient noise levels, the noise from such activities is brief and sporadic, which helps to minimize overall noise exposure. Additionally, all blasting operations would follow the Blasting Plan Methodology (Appendix I in MVE [2023]), which is aimed at reducing negative impacts.
5189-7	Traci Wood	What about the noise pollution or the vibrations?	Ground-borne vibration generated by wind turbines are usually quite minimal, especially when compared with other human-made sources like traffic, construction, or industrial equipment. Studies have shown that the vibration levels created by wind turbines are significantly below the human perception threshold, even for those living close to a turbine. The placement of the wind turbines will be far enough from homes and sensitive locations to mitigate any potential effects. Furthermore, the design of modern wind turbines has greatly improved in the past decade. Today's manufacturers use a variety of vibration damping methods to lessen the vibratory response of the components and the structure, thereby reducing the transmission of these vibrations to the ground.
5438-1	Sue Page	There doesn't seem to be any mention in the EIS of exposure to humans or animals and the damage to organs and tissues. These machines will be running around the clock. The continuous vibrations will resonate into the ground and can be heard through concrete. In the attached study, it says long term exposure can cause lesions in the vascular, osteoarticular and nervous systems.	Regarding the vibrations caused by wind turbines, it is true that these machines do produce some level of vibration. However, research indicates that the amount is typically very low, especially when compared to other sources of vibration in the environment such as traffic, construction, and industrial machinery. These vibrations decrease substantially with distance and are unlikely to be perceptible or cause any health issues at typical distances from wind turbines.
5920-1	Kelly Varelmann	Has there been a study to find out how many miles away the blasting will be heard and felt?	Blasting impacts, including noise and vibration, typically decrease with distance. However, the exact distance at which blasting effects can be heard or felt varies based on several factors such as the specific blasting techniques used, the local geology, and atmospheric conditions. For the estimation of noise and vibration levels from blasting activities, the BLM typically relies on established scientific models and guidelines from organizations like the FHWA and the Mine Safety and Health Administration (MSHA). While there might not have been a direct study on how many miles away the blasting can be heard or felt for this project, the EIS does include an analysis of potential noise impacts from blasting activities.
6511-2	Kelly Varelmann	How will the noise from the extended daily blasting affect the nearby residents, livestock and wildlife? Has there been a study to find out how many miles away the blasting will be heard and felt?	See response to comment 5920-1 (see in Table A-3r, Noise). The potential impacts of blasting during construction are indeed taken into account in the EIS for the project. Noise and vibrations from blasting are highly localized and diminish quickly with distance due to the natural attenuation of sound and vibration through air and soil. Blasting is also a temporary activity and will only be carried out during the construction phase. A detailed analysis has been conducted, including the potential noise levels at various distances. Using data from the FHWA, we estimate that typical blasting operations would generate noise levels of about 94 dBA at a distance of 50 feet. This level decreases with distance, dropping to around 59.5 dBA at 0.5 mile, and around 43.7 dBA at 3.1 miles, which is the distance to the nearest occupied sage-grouse lek. Impacts on wildlife and livestock have also been assessed. While the sudden noise from blasting could temporarily disturb animals, wildlife typically adapts quickly to such disturbances. The short-term and localized nature of blasting activities further reduces the potential for significant impacts. Livestock is generally less sensitive to noise than wildlife.
6911-2	Barbara Williamson	Each fan creates a loud HUM which can be mind-numbing for those living nearby. In a remote area, it may have an unknown effect on animal life. If close to homes, people living there must live with the constant hum.	The sound generated by wind turbines is indeed a consideration in their placement and design. As the blades pass the turbine tower, the noise is often described as a swish or whoosh rather than a continuous hum. Turbine noise levels, in general, are based on the distance from the source to the turbine. In regard to human impact, research suggests that the noise produced by wind turbines is unlikely to cause any serious harm to humans.
7619-1	Diana Nielson	I Question the Quality of the Data in the Noise Technical Report for the Lava Ridge Wind Turbine Project and the FAA Application 7460-1, Notice of Proposed Construction or Alteration,. Which is correct? They both have different elevation data. The discrepancy is too wide to be acceptable. The FAA application is a requirement for Lava Ridge Wind Turbine Project. All Data submitted to the FAA must be accurate. While Comparing the FAA Application to the Noise Technical Report for the Lava Ridge Wind Project: Section 4 page 5 . Highlighted in Purple Ink. 4 EXISTING CONDITIONS A characterization of the landscape features, existing roads, and land use of the siting corridors and vicinity are provided in Section 2 above. The elevation of the siting corridors ranges from 3,900 to 4,600 feet. In all, 135 residential NSAs, 23 sage-grouse leks, 68 raptor nest locations and three schools were included in the analysis. Livestock grazing occurs throughout the area, and thus livestock were also included in the analysis. A map of the siting corridors showing the general location of the siting corridors and of the identified NSAs is provided in Figure 1. >From Page 3 of 24 in FAA Public Notice release 02/02/2023 Addressed to Chantry Dunlap, Magic Valley Energy, LLC 1610 Main Circle Drive, Suite 310, Chesterfield, MO Additional Information for ASN 2022-WTW-4666-OE Proposal: To construct and/or operate a(n) Wind Turbine to a height of 660 feet Above Ground Level, 4933 feet Above Mean Sea Level. Structure: Location: Latitude: Longitude: Heights: Wind Turbine Q18 Dietrich, ID 42-47-46.13N NAD 83 114-03-36.86W 4273 feet site elevation (SE) 660 feet above ground level (AGL) 4933 feet above mean sea level (AMSL) ASN /	See response to comment 10426-5 (see in Table A-3r, Noise). The project noise technical report (SWCA 2022) was prepared for the project. This report offers an in-depth analysis of the noise impacts associated with the proposed wind turbines, using sophisticated computer modeling and on-site measurements to predict potential noise levels at various distances and conditions. Livestock and human health (residences and schools) are addressed here; other sensitive receptors and resources potentially affected by project noise are evaluated in detail in their respective EIS sections. The BLM did not prepare the FAA notice referenced in the comment and therefore cannot speak to the elevation ranges included in that notice.

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		AGL / AMSL / LATitude / LONGitude >From Page 5 of 24 Lowest AMSL: 2022-WTW-4252-OE / 660 / 4613 / 42-47-42.68N / 114-18-47.34W. >From Page 8 of 24 Highest AMSL: 2022-WTW-4420-OE / 660 / 5669 / 42-45-56.34N / 113-54-01.84W. Link To Data can be Viewed with Link : https://oeaaa.faa.gov/oeaaa/external/WebBlobServlet <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Foeaaa.faa.gov%2Foeaaa%2Fexternal%2FWebBlobServlet&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C92df94159bd94431722308db2fe535b4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638156433720507778%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=bdXj5DtGbFRoTUyXW4S8%2F%2FAXimzcEfkh2kfDMKyQtJ4%3D&reserved=0> or this link and open PDF labeled circulation :https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=displayOECase&oeCaseID=534386821&row=0&fbclid=IwAR3gv1L1-7989w2v1uVrnxKWcOvlv__VnfUdzt9HGuDWdbpKofRtnUQeNcY <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Foeaaa.faa.gov%2Foeaaa%2Fexternal%2FsearchAction.jsp%3Faction%3DdisplayOECase%26oeCaseID%3D534386821%26row%3D0%26fbclid%3DIwAR3gv1L1-7989w2v1uVrnxKWcOvlv__VnfUdzt9HGuDWdbpKofRtnUQeNcY&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C92df94159bd94431722308db2fe535b4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638156433720507778%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=RxpNbzpzkuD91DSasIoO%2B%2BU%2Fz12yyB%2FW98s5oyz9FHg%3D&reserved=0> Both of these reports are very important reports. They both involve the Sage Grouse, Mule Deer, Pronghorn, Hawks, Eagles, pollinators (including batts, grazers and the residents of this area. Noise both audible and infrasound affects everything. Elevations of the towers affect many types of frequencies, EMF, ELF, VLF, EMR plus more. They also are a collision hazard for aircraft and wildlife.	
8458-3	Sue Page	How will that blasting effect the schools in Eden?	The closest school in Eden is situated approximately 6 miles south of the proposed turbine corridor. At this distance, the estimated sound level due to our operations would be 38 dBA. To put this in perspective, our previous assessments have assumed the Leq nighttime and daytime noise levels to be 34 and 40 dBA, respectively, at residential communities. This means the sound level at the school from the blasting would be within the range of what is considered typical for residential areas and well below what could be considered harmful or disruptive. Furthermore, it is essential to note that the duration of the noise from the blasting is very brief. Such short durations of noise are less likely to cause any significant disturbance, especially when you consider the usual ambient noise in a school environment during active hours.
8638-1	Mark Southwick	Constructing 400 turbines with a foundation base of 60' in diameter and a depth of 15' will transfer sound and vibration from those turbines for miles through underground lava. Like a guitar or piano soundboard, the noise transfer from the lava will be amplified in residences and other human or livestock habitat. It would also negatively impact the environment of animals nesting on rocks, trees, poles or in caves. Your report states that the turbines generate a 124.6db noise at the turbine level (321'), 73.9db at ground level and 85db at the rotating blades. All these levels are above federal minimum standards measured in open air and assume that surrounding animal and human habitat will be far enough away to allow a diminished impact, all while missing the noise and vibration impact the foundations would transfer via underground lava. Your report does not address or measure the impact that noise and vibration transfer through lava will have on animal habitat, residential and farming structural elements or human health effects.	In our analysis, the BLM considered the noise levels at the turbine and ground levels, and these figures were indeed taken in open-air conditions. However, it is important to clarify that the presented noise levels are maximum values under worst-case scenarios, and actual levels at any particular location depend on multiple factors including the distance from the turbine. In practice, noise levels decrease substantially with distance from the turbine. Regarding your concerns about vibrations and their propagation through the underground lava, please note that wind turbines are designed to minimize mechanical vibrations. Typically, any vibrations generated by a wind turbine are primarily localized to the turbine structure itself and do not translate into significant ground-borne vibrations. The vibrations caused by the operation of a wind turbine are usually well below the levels that could cause damage to buildings or other structures, or cause annoyance to people or animals.
8639-4	Mark Southwick	The above concerns as well as irritating sub-audible and hyper-audible noise along with irritating cyclic electrical vibrations are experienced by individuals near similar wind farms, though overlooked as affecting only a few .	In terms of subaudible noise, you are likely referring to infrasound, which is sound below the frequency range of human hearing (below 20 Hz). Wind turbines do generate infrasound, but numerous studies have shown that the levels are typically well below the threshold of perception for humans, and well below the levels at which health effects are known to occur. Hyper-audible noise, or ultrasound (above 20,000 Hz), is typically not produced in significant amounts by wind turbines. Ultrasound can be absorbed by the atmosphere over short distances, and its intensity decreases rapidly with distance from the source. Therefore, it is unlikely to be an issue for nearby residents.
8790-6	James Ritchie	5.The draft EIS doesn't address the constant noise and flicker from the rotating turbine blades and its effect on humans and livestock.	We understand and acknowledge these concerns and have already addressed them in the project noise technical report (SWCA 2022). Livestock and human health (residences and schools) are addressed here; other sensitive receptors and resources potentially affected by project noise are evaluated in detail in their respective EIS sections. The project noise technical report offers an in-depth analysis of the noise impacts associated with the proposed wind turbines, using sophisticated computer modeling and on-site measurements to predict potential noise levels at various distances and conditions.
9183-2	Julie DeWolfe	Infrasound/ Low Status Sound: Oxford Dictionary online defines infrasound as, “sound waves with frequencies below the lower limit of human audibility.” To Whom it may concern, After examining the EIS online and word searching Volume 1, Volume 2a, Volume 2b, and Volume 3, I was unable to find examination of INFRASOUND and its impact upon animals in nature, livestock, insects, and human beings. MVE representatives informed me, at the Canyon Crest open house, that nowhere else are there 740-foot turbines erected and producing power, perhaps the experimental size of Lava Ridge proposed turbines limit what may be known and studied about	Infrasound, which refers to sound waves with frequencies below the lower limit of audibility for humans, is indeed produced by many natural and human-made sources, including wind turbines. However, the levels of infrasound near wind farms have been found to be below the perception threshold for humans, and they are generally lower than levels produced by natural sources like the ocean and wind itself.

Comment ID	Commenter	Public Comment	Response to Comment
		them at this point, however, Lava Ridge Wind Project EIS does not appear to include research on infrasound at all. How might infrasound affect fractured basalt, ash layer, animal production, wildlife, insect communication, or human health? Many scientific studies have been published on the effects of infrasound, but these studies were on smaller turbines than the ones being proposed, I do not wish to be a test subject for the world's tallest turbines. Many studies point to very negative health impacts upon living creatures, even as far away as 10 miles from turbines. Experts have examined infrasound and determined that there are serious health effects. IOP Science Environmental research letters Infrasound and low frequency noise from wind turbines: exposure and health effects Abstract: "Wind turbines emit low frequency noise (LFN) and large turbines generally generate more LFN than small turbines." https://www.masterresource.org/wind-power-health-effects/infrasound-growing-liability-windpower/ <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.masterresource.org%2Fwind-power-health-effects%2Finfrasound-growing-liability-windpower%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cfce8fa9888c2492acc0808db3a99871e%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638168203306308897%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=EIY8ef6zuLsFLmdRMFiAmE2xRb7ubMr9pUktLeo4BdI%3D&reserved=0> ScienceDirect Renewable and Sustainable Energy Reviews Volume 168, October 2022, 112801 "While the number of studies on the impact of noise pollution on wildlife is increasing [29], very few focus on WTN [30]. Nonetheless, dedicated studies on WTN are important given that properties of sound, location of its source, and spatial propagation have all been found to vary greatly between land uses, and be crucially significant for determining the type and extent of anthropogenic noise effects on wildlife." https://www.sciencedirect.com/science/article/pii/S1364032122006852 <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.sciencedirect.com%2Fscience%2Farticle%2Fpii%2FS1364032122006852&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cfce8fa9888c2492acc0808db3a99871e%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638168203306308897%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=28oU4%2FHmKIOXL0eQrncMRKTDZiQdFk%2BB7YM8EEhASJU%3D&reserved=0> MasterResource Infrasound: A Growing Liability for Wind Power By Sherri Lange -- May 29, 2019 "Wind turbines appear to be at the apex of producing human discomfort, annoyance, and harm. In particular, infrasound and low-frequency noise (ILFN) harm because of impacts unique to this concoction of noise." "A recent Finnish assessment, scientifically valid and reproducible, found that infrasound (IS) only began to really attenuate after 15-20 km." (see Finnish assessment attachment A)	The potential effects of infrasound on human health and wildlife are complex and still an active area of research. However, the majority of studies conducted so far have not established a direct link between infrasound from wind turbines and health impacts in humans or animals. As you noted, the effects of wind turbine noise on wildlife are also not fully understood. Some research indicates that wildlife can be initially disrupted by the construction and operation of wind turbines, but populations usually adapt over time. Regarding your concerns about infrasound affecting fractured basalt, ash layers, and insect communication, these are indeed complex issues that require more research. At present, there is limited evidence to suggest significant impacts in these areas.

Paleontological Resources

Table A-3s. Paleontological Resources

Comment ID	Commenter	Public Comment	Response to Comment
11535-138	Steven Andersen	The DEIS analysis focuses on known paleontological resources in the area. However, the inherent nature of paleontology is that resources are unknown and not yet discovered.406 The DIES acknowledges as much, asserting the analysis area contains "high or moderate potential to yield fossils."407 The DEIS attempts to solve this problem by requiring a paleontologist evaluation prior to decommissioning. This type of measure conducted after the completion of the project would do little to mitigate the destruction of unknown paleontological resources during and throughout the entire construction and development phase of the project. In response to the paleontologist evaluation "a monitoring and inadvertent discovery plan would be developed to reduce the likelihood of impact to these resources."408 Again, monitoring the discovery or paleontological resources after the construction has already destroyed them is a hollow and inadequate mitigation effort. Moreover, this effort is only if "deemed necessary" but there is no assertion as to who deems this action necessary.	The EIS includes analysis detailed analysis for one paleontological issue: "How would ground disturbance associated with the project physically affect unknown paleontological resources in areas with mapped Quaternary-age alluvial and lacustrine (or playa) deposits?" Effects to paleontological resources from construction and decommissioning actions would be limited (or controlled) because of the minimal acres of Quaternary-age lacustrine or alluvial deposits within areas of potential disturbance. In addition, MVE's applicant-committed measures 97 through 99 (see Table App4-2j in EIS Appendix 4 [Mitigation]) would be implemented to reduce potential impacts to paleontological resources during construction by establishing a Paleontological Resources Treatment Plan (applicant-committed measure 97). The Paleontological Resources Treatment Plan (Appendix Q in MVE [2023]) would be further developed to outline processes for resource avoidance, assessment, monitoring, and notification of inadvertent discoveries. Applicant-committed measure 98: The Paleontological Resources Treatment Plan would do the following: • Address the education of construction and operations staff and the public on unauthorized collection (or impact) to fossils on public land • Outline guidelines for the avoidance, assessment, and notification of discovered fossils during ground-disturbing activities • Provide a monitoring plan of project ground-disturbing activities in areas of Quaternary-age alluvial and lacustrine (or playa) deposits • Outline guidelines for the preparation, identification, analysis, and curation of fossils that may be collected during monitoring • Provide a framework for the required paleontological monitoring report. Applicant-committed measure 99: Unexpected discovery of cultural or paleontological resources during construction would be brought to the attention of the responsible Authorized Officer immediately. MVE would halt work in the vicinity of the discovery to avoid further disturbance to the resources while they are being evaluated and appropriate next steps are being developed.

Comment ID	Commenter	Public Comment	Response to Comment
			The BLM will deem what mitigation measures would be necessary prior to, during, and following project construction. The EIS also includes rationale for analyzing these three potential issues in brief: "AIB-22: How would concrete foundations for turbines and other infrastructure affect access for scientific research to unknown paleontological resources in areas with Quaternary-age mapped geology? AIB-23: How would human access throughout the project affect the risk of looting or vandalism of known or unknown paleontological resources? AIB-24: How would ground disturbance at material source areas not yet determined (associated with project decommissioning and reclamation) physically affect known or unknown paleontological resources in areas with Quaternary-age mapped deposits?"
11978-127	Magic Valley Energy, LLC	29. Section 3.10.1.1 Paleontological Resources - Affected Environment "The remainder of the Quaternary-age alluvial and lacustrine (or playa) deposits in the siting corridors were deposited during heavy rain and rapid snow melt events in low areas, including between basalt flows, primarily during the Pleistocene and more rarely into recent times and are largely derived from erosion of glacial loess and the older Glenns Ferry Formation (Orthberg et al. 2012)." MVE notes the source name is incorrect. MVE requests the language be updated: "The remainder of the Quaternary-age alluvial and lacustrine (or playa) deposits in the siting corridors were deposited during heavy rain and rapid snow melt events in low areas, including between basalt flows, primarily during the Pleistocene and more rarely into recent times and are largely derived from erosion of glacial loess and the older Glenns Ferry Formation (Othberg et al. 2012)."	This typo has been corrected.
11978-128	Magic Valley Energy, LLC	30. Section 3.10.1.2.2 Paleontological Resources - Alt B "Alternative B work area ground disturbance combined with ground disturbance from existing and future trends and actions would total up to 156 acres or 12.6% of the total analysis area." MVE would appreciate clarification: Does this includes linear miles of roads?	As described in Section 3.10.1.1.1 (Existing and Future Trends and Actions), road impacts are disclosed in miles not acres.

Pollinators and Insects

Table A-3t. Pollinators and Insects

Comment ID	Commenter	Public Comment	Response to Comment
1050-1	Samuel DeGrey	While working for IDFG, I performed range and conservation status assessments for the State Wildlife Action Plan on a variety of insect species considered to be Species of Greatest Conservation Need (SGCN). SGCN species are generally those that are rare and at risk, and include many species that may be just as or more threatened than species federally listed under the Endagered Species Act. One species of rare native bee, Calliopsis barri (https://idfg.idaho.gov/species/taxa/1475434), has a projected range that overlaps with all alternatives of the Lava Ridge project. Calliopsis barri is an S1 SGCN, meaning it is, "Critically imperiled because of extreme rarity or because some factor of its biology makes it especially vulnerable to extinction (typically 5 or fewer occurrences)." Another rare bee, Ashmeadiella sculleni (https://idfg.idaho.gov/species/taxa/1475278), is known from Lincoln county, and while it is not known if it occurs within the proposed lava ridge project, its known habitat is nearby and it is highly possibly this bee also occurs within the region outlined by the project. A. sculleni is an S2 SGCN. Little is known about the population viability or habitat requirements of these two pollinators. The EIS addresses pollinators under section 3.11 , but it does not address either of the rare SGCN bees that likely occur within the proposed confines of lava ridge. Calliopsis barri is a pollinator of the Picabo milkvetch (Alexander et al. 2004), a rare plant which itself is listed among those potentially impacted in the EIS. The EIS repeatedly notes the potential risk to pollinators under section 3.11, including the following excerpts; "Large numbers of insects may be killed by wind turbines. A recent study in Germany estimated that a single turbine located in a temperate zone may kill up to 40 million flying insects per year" and "Decline of insect populations may also diminish their ecosystem function, such as pollination. Declines in pollinators can thus reduce the ability for plants to reproduce and maintain native vegetation community components." With all this in mind, the wind project may pose a serious threat to our local population of Calliopsis barri, particular if nesting sites are destroyed or individual bees killed, which may have a disproportionate affect on a species with a restricted, patchy range, and possibly natural low population numbers. This could then harm the Picabo milkvetch by reducing pollination rates of this very rare, Idaho endemic plant. The current EIS fails to address the risk to these bees, and severely underestimates the potential environmental risks associated with loss of these rare pollinators.	Habitat and range information for Idaho SGCNs were reviewed to determine which species may occur in the siting corridors and be affected by the project. The final EIS has been revised to include the rationale for species that were eliminated from detailed analysis in the EIS (see Tables App3-4 and App3-5 in EIS Appendix 3 [Issues Analyzed in Brief]). *Calliopsis barri* and *Asmeadiella sculleni* have been reclassified as SGINs in the updated Idaho SWAP (IDFG 2023) and therefore are not included in Table App3-4. SGINs are not addressed in the EIS due to the lack of information on these species. Impacts to these species, if they occur in the siting corridors, would be similar to those disclosed for Bureau of Land Management Special-Status Bumble Bees in EIS Section 3.11.4.2 (Impacts).
11224-4	Thomas Billington	Will BLM take responsibility for the loss of pollinators that grow our food in the Magic Valley?	Impacts to pollinators are discussed in EIS Section 3.11.1.2, which specifically discloses the potential for reductions in pollinator populations to diminish the ecosystem services they provide, including pollination of agricultural crops. Additional discussion is provided in Section 3.11.3.2 (Monarch Butterfly, Impacts) and Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). Although all action alternatives would impact pollinators to some degree, however studies quantifying the potential magnitude of this impact are lacking (Arcadis Belgium 2020). Approximately half of all existing wind energy turbines are located in cultivated

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			cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but studies linking a reduction in crop productivity or yield due to wind turbine–caused pollinator declines are lacking. This issue cannot be analyzed in greater detail due to a lack of studies quantifying crop yield following pollinator loss as a result of wind turbines. Arcadis Belgium. 2020. *Business and nature working together: action by the energy sector to protect wild pollinators*. Technical guidance prepared by Arcadis Belgium for the European Commission under contract No. 07.0202/2018/795538/SER/ENV.D.2 Technical support related to the implementation of the EU Pollinators Initiative. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
11297-1	Steven Upton, Linda Upton	There are also several hundred acres of Monarch butterfly habitat, it is known Monarch butterflies are almost extinct. If this project reduces the monarch butterfly habitat what impact will it have on the monarch butterflies?	The monarch butterfly is discussed in EIS Section 3.11.3 (Monarch Butterfly).
11297-5	Steven Upton, Linda Upton	One wind turbine per year kills up to 40 million insects. If we wipe out the insects we will not have pollinators for crops, so we will not be able to grow food.	The potential for impacts to pollinators to diminish the ecosystem services they provide, such as pollination of agricultural crops, is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts). All action alternatives would impact pollinators to some degree; however, studies quantifying the magnitude of this impact are lacking (Arcadis Belgium 2020). Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but studies linking a reduction in crop productivity or yields due to pollinator declines from wind turbine mortality are lacking. This issue cannot be analyzed in greater detail due to a lack of studies quantifying crop yield following pollinator loss as a result of wind turbines. Arcadis Belgium. 2020. *Business and nature working together: action by the energy sector to protect wild pollinators*. Technical guidance prepared by Arcadis Belgium for the European Commission under contract No. 07.0202/2018/795538/SER/ENV.D.2 Technical support related to the implementation of the EU Pollinators Initiative. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
11503-1	Liz (No Last Name Provided)	The success of Magic Valley agriculture depends on the abundance of pollinators. This important aspect of nature is under threat in the Magic Valley if the proposed Lava Ridge Wind Turbine Project is allowed to be built. And from the EIS: "All action alternatives would have irretrievable effects on pollinators through habitat alteration and loss (from work areas and infrastructure) and through displacement, injury, or mortality (vehicle strikes; collision with turbine blades; and application of herbicides or pesticides, removal of vegetation). Habitat alteration and loss effects would last up to 84 years (34 years for project construction, operation, and decommissioning plus 50 years for vegetation to reestablish after final reclamation)." Page 3-310 This impact would be felt by agriculture in loss of productivity. Farmers are already dealing with a loss of bee pollinators due to disease and insecticides. "The presence of wind farms may strongly affect insect pollinator communities with potentially cascading ecosystem effects. Insects represent 80 per cent of the world's species, dominate terrestrial ecosystems, and provide critical ecosystem services such as food for animals and pollination. Insect pollinators are vital for ecosystem health and functioning, both in their native environments and in agricultural systems. Large numbers of insects may be killed by wind turbines, given that residue from insect carcasses on turbine blades creates drag that can decrease efficiency between 25-50 per cent. Turbine color and the heat generated during operation may attract insects and, in turn, bats and birds that feed on insects. Indeed, the majority of bats and birds killed by wind turbines are insectivorous species." https://www.technologytimes.pk/2020/04/14/insect-pollinators-windspeed-foraging-behavior/	The potential for impacts to pollinators to diminish the ecosystem services they provide, such as pollination of agricultural crops, is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts). This issue cannot be analyzed in greater detail due to a lack of studies quantifying crop yield following pollinator loss as a result of wind turbines (see response to comment 11297-5 [see in Table A-3t, Pollinators and Insects]).

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11534-7	Matt Arnold, William Eubanks	Consider, for example, the DEIS and PEIS's examination of fugitive dust impacts on pollinators (e.g., bees), which serve vital ecosystem services for farmers in southern Idaho and elsewhere. As the DEIS forthrightly acknowledges, populations of "[w]ild pollinators . . . are in decline," and much of this decline is tied to the loss of native plant species on which pollinators depend for their habitat and diet. DEIS at 3-299-300. Roads and roadsides associated with wind projects are particularly dangerous for native plant species because they not only cause direct losses, but also because they foster the growth of more successful invasive species. Id. at 303 (explaining why roads are breeding grounds for invasive species); see also PEIS at 5-40 (discussing the myriad ways that "fugitive dust" may impact vegetation). In isolation, dust impacts might seem nominal; however, at industrial wind-energy sites covering tens of thousands of acres, like this one, they are a serious concern for native plants and pollinators since "[f]ugitive dust generation may be relatively high at wind energy development sites located in the more arid ecoregions." PEIS at 5- 40; see also DEIS at 3-358 (describing the analysis area as "arid" with "relative[ly] cold temperatures and [a] lack of moisture"). Despite all of this, the DEIS tiers its analysis of dust impacts on native plants and pollinators to the PEIS, claiming that "[the PEIS] discloses the potential effects of fugitive dust on vegetation and [pollinators], which include injury and mortality of vegetation and respiratory effects to wildlife." DEIS at App'x 3-22 (citing PEIS at 5-40–5-44). The PEIS, in turn, merely states that: [T]he significance of vegetation loss associated with a wind energy project depends on the amount of area disturbed, the types of plant communities (and the habitats they make up) that would be affected, the nature of the effect, the capacity for the disturbed habitat to recover (some habitat types may take a much longer time to recover than others), and whether listed or sensitive plants would be affected. These factors would determine whether the construction impacts to vegetation would be short or long term. DEIS at 5-38. This cursory statement cannot replace the "hard look" under NEPA that the agency owes to pollinators and the farmers that depend on them. Klamath–Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt., 387 F.3d 989, 993 (9th Cir. 2004) ("General statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." (quoting Ocean Advocates v. U.S. Army Corps of Eng'rs, 361 F.3d 1108, 1128 (9th Cir. 2004))). In fact, the Ninth Circuit has already cast doubt on the sufficiency of the generic analyses contained in the PEIS. See W. Watersheds Project v. Bureau of Land Mgmt., 443 Fed. App'x 278, 280 (9th Cir. 2011) (Graber, J., concurring) ("[T]iering to the 2005 [PEIS] does not cure [BLM's] lack of analysis" when the PEIS's "statement is as general and conclusory as the analysis appearing within the [EIS].").4	BLM (2005:5-44) states, "Fugitive dust generation during construction activities is expected to be short term and localized to the immediate area of the wind energy project and is not expected to result in any long-term individual or population-level effects." As described under AIB-59 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1, a number of measures would be implemented under all action alternatives to minimize or avoid impacts from fugitive dust generation; therefore, the effects of the action alternatives would be no greater than previously disclosed in BLM (2005), and further analysis is not warranted.
11535-74	Steven Andersen	The DEIS fails substantially to consider the negative, irreversible effects the project will have on the monarch butterfly habitat and population. Importantly, the DEIS provides only a cursory review of the potential injury to habitat, and greatly minimizes the effect of decreased availability of milkweed, nectar resources, and other general factors crucial for monarch butterfly population. As a threshold matter, the U.S. Fish & Wildlife Services has designated the monarch butterfly as a candidate under the Endangered Species Act.229 While status under the Endangered Species Act is currently pending, that does not diminish the importance of protection and conservation and does not obviate the BLM's responsibility in the DEIS to take a hard look at the environmental consequences. The fact is that the monarch butterfly population has seen a devastating decline since the 1980s, going from a reported 3-10 million butterflies, to 200-300 thousand butterflies in the early 2000s, all the way down to well below 30,000 butterflies in 2020 (a greater than 99% decline since the 1980s).230 The threat is glaring, yet not thoroughly considered in the DEIS.	The BLM is mandated to identify, protect, and manage sensitive species on the lands under its jurisdiction, outlined in BLM Manual 6840 – Special Status Species Management (BLM 2008). EIS Section 3.11.3.1 (Monarch Butterfly, Affected Environment) notes the observed population declines. EIS Section 3.11.3.2 (Monarch Butterfly, Impacts) provides a detailed analysis of potential impacts to breeding habitat under each alternative. The analysis used a 2019 modeling effort conducted by IDFG, which is the best available scientific information to disclose impacts to breeding habitat (IDFG 2019). Based on this analysis, between 28 and 99 acres of modeled breeding habitat would be replaced by project infrastructure (Table 3.11-8), which would be between 3% and 11% of total modeled breeding habitat in the analysis area. As monarch butterflies are foraging generalists, the EIS analysis states that impacts would be similar to those discussed for general pollinators in EIS Section 3.11.1.2 (Pollinators, Impacts). The EIS documents potential impacts to the species based on the available information.
11535-75	Steven Andersen	It is apparent from the language in the DEIS that conservation efforts have been gravely downplayed, and sufficient research has not been conducted. For example, there are passing remarks that try and minimize the irreparable effect the project will have, such as, "Idaho does not host overwintering or resident populations of monarchs,"231 "[g]iven the relatively small proportion of suitable breeding habitat, the analysis area is unlikely to support dense populations of milkweed that could provide high-quality breeding habitat for large numbers of monarch butterfly,"232 and "[o]verall, 74% of suitable habitat and 78% of optimal breeding habitat have been or will be affected by existing and future trends and actions."233 However, the DEIS admits that "[m]ilkweed specific surveys were not conducted in the siting corridors[,]" 234 "[n]o species-specific surveys have been conducted in the siting corridors[,]"235 and "the exact location of infrastructure and activities within the siting corridors is unknown at this time."236 Gauging the extent of habitat loss in the West at the landscape scale over time is a complex and challenging task even with sufficient research, but without conducting specific surveys on key resources such as milkweed or nectar makes it near impossible.237 The BLM has not carried its burden and has not fully addressed the adverse impacts on the monarch butterfly. The DEIS indicates milkweed was only "incidentally" recorded and considered during project surveys which is concerning given the importance milkweed plays on the monarch butterfly population and habitat. Specifically, a decrease in milkweed resources may leave monarchs with fewer resources on which to feed and lay their eggs, resulting in decreased recruitment for the population.238 Availability of milkweed is essential to monarch reproduction and survival, and its reduction is cited as a key driver in monarch declines.239 The Snake River Plain is a key breeding area in the West, including in Idaho, and any negative impact on the monarch butterfly population is likely to accelerate the extinction of the species.240 By only "incidentally" observing milkweed, and outright admitting that "[m]ilkweed specific surveys were not conducted in the siting corridors[,]"241 the DEIS fails substantially.	Additional project-specific measure zz in EIS Appendix 4 (Mitigation) would require MVE to conduct preconstruction surveys for milkweed and monarchs (including both eggs/larvae on milkweed and adult monarchs) in infrastructure and work areas from May through October, following the procedure outlined in applicant-committed measure 110, and to avoid removal and disturbance of milkweed.
11535-76	Steven Andersen	While the DEIS purports to support its conclusory statements with certain citations, it fails to address certain key conservation guidelines set forth in two primary sources, exposing its deficiencies: the 2020 Species Status Assessment (SSA) and the Western Monarch Butterfly Conservation Plan (as revised) (of which Idaho is a part). 242 In fact, the DEIS makes little to no mention of conservation efforts, only minor mitigation efforts generally	See response to comment 11535-75 (see in Table A-3t, Pollinators and Insects) for a description of milkweed avoidance requirements. Additionally, mitigation measure aaa in EIS Appendix 4 (Mitigation) would require MVE to avoid application of herbicides within 25 m of milkweed, and if herbicides are used, would require application be conducted in the early morning and evening to avoid pollinator active periods. Applicant-committed measure

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		(which are not the same). The SSA and the Conservation Plan provide that the loss of milkweed and nectar resources (i.e., breeding and migratory habitat) has been targeted as the threat that can be most easily addressed through conservation efforts.243 Key aspects of the conservation of the monarch butterfly are protection, restoration, enhancement and creation of habitat. 244 These are central to recent monarch conservation strategies, thus highlighting the importance of restoring and enhancing milkweed and nectar resources.245 More specifically, a crucial part of the conservation is to enhance and maintain habitat in western States (including Idaho), by identifying and protecting existing habitat, and planting milkweed species and flowering plants that are appropriate for the location. The DEIS makes no mention of these efforts, and even worse, despite all of this available information, omits any proposed compensatory mitigation of any kind.	102 includes the incorporation of pollinator-friendly seed mixes for restoration and additional project-specific measure ll includes additional seed mix and habitat restoration requirements to benefit pollinators. Implementation of these measures would reduce the potential for disturbance or degradation of milkweed. The Western Monarch Butterfly Conservation Plan, 2019–2069 (Western Association of Fish and Wildlife Agencies 2019) has been incorporated into the final EIS. EIS Section 3.11.3.1 (Monarch Butterfly, Affected Environment) discloses the loss of breeding habitat, specifically milkweed host plants, as the primary cause for the decline of the monarch butterfly. As also disclosed in this section, the sagebrush steppe habitat in the siting corridors exhibit low suitability for milkweed or breeding monarchs, only 3.7% of the siting corridors are considered suitable habitat for monarchs and only 0.5% of the siting corridors are considered optimal monarch breeding habitat. The EIS has been revised to include additional mitigation measures recommended by the Xerces Society for monarch butterfly and pollinators in general (see project-specific mitigation measures zz, aaa, bbb, and ccc). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation). Since monarch breeding habitat in the siting corridors is limited and would be mostly avoided (due to the implementation of avoidance buffers for wetlands and other water resources; see applicant-committed measure 136) and restoration measures would include reseeding with native seed mixes designed to benefit pollinators (applicant-committed measure 102), there would not be residual impacts to monarch butterfly that warrant compensatory mitigation under any of the action alternatives.
11535-78	Steven Andersen	Further, while the DEIS cites to the Xerces Society, it disregards completely their approach to monarch habitat conservation. The Xerces Society's approach (which is approved by the Idaho Governor's Office of Species Conservation) to monarch habitat conservation can be summarized by the following priorities, in order of importance: (1) identify, protect, and manage existing habitat to maintain its value for monarchs; (2) enhance existing habitat (if needed and appropriate) to improve its value for monarchs; and (3) restore habitat in areas where it occurred historically, but has been lost. No where in the DEIS does the BLM address these guidelines, despite citing to the Society generally.	The Western Monarch Butterfly Conservation Plan, 2019–2069 ((Western Association of Fish and Wildlife Agencies 2019) has been incorporated into the final EIS.
11535-79	Steven Andersen	Even more, the DEIS purports that "the majority of modeled monarch butterfly breeding habitat in the analysis area has already been or would be impacted by human development [and other factors]…and may no longer provide quality native habitat for monarch butterflies."249 However, this statement is made in the face of the admission that surveys have not been conducted and the siting area has not yet been selected. The DEIS also includes this, and many other statements similar in nature, without providing any proposed conservation methods or efforts (and as stated, expressly rejects compensatory mitigation at the very least). Thus, the BLM's proposed actions fly in the face of conservation guidelines, underplaying the catastrophic impact the project will have on the monarch butterfly population.	See response to comment 11535-76 (see in Table A-3t, Pollinators and Insects) for a description of avoidance and other pollinator-related minimization and mitigation measures that would be implemented. Implementation of these measures would reduce the potential for disturbance or degradation of milkweed, where present, and impacts would be unlikely to reach catastrophic levels.
11535-126	Steven Andersen	The DEIS underestimates the impact that this project will have on pollinators and the surrounding ecosystem. The presence of wind farms may strongly affect insect pollinator communities with potentially cascading ecosystem effects.367 Insects represent 80% of the world's species, dominate terrestrial ecosystems, and provide critical ecosystem services such as food for animals and pollination.368 Insect pollinators are vital for ecosystem health and functioning, both in their native environments and in agricultural systems.369 Large numbers of insects may be killed by wind turbines, given that residue from insect carcasses on turbine blades creates drag that can decrease efficiency between 25-50%.370 Turbine color and the heat generated during operation may attract insects and, in turn, bats and birds that feed on insects.371 Indeed, the majority of bats and birds killed by wind turbines are insectivorous species.372 In the last 10 years, the population of monarch butterflies that come to Idaho has already dropped by 99%. The DEIS fails to account for the loss of pollinators in the aggregate. A Princeton study suggests that "ongoing pollinator decline may unravel the very fabric that keeps plant diversity stable."374 Because pollinators are vital to the ecosystem, a decrease in their population leads to a decline in plant biodiversity. Notably, native species which depend on pollinators would be reduced and noxious weeds that do not depend on pollinators could increase.375 A loss in desirable vegetation in the area would ultimately affect larger herbivores in the area. Recent estimates suggest that around 87.5% of the world's flowering plant species are animal-pollinated.376 Reduced pollination of these plants will lead to lower seed or fruit set, lower plant regeneration rates and knock-on effects to the animals that rely on plants and their products for food.	Impacts to pollinators, including the monarch butterfly, are disclosed in EIS Section 3.11 (Pollinators and Insects). Section 3.11.1.1 (Pollinators, Affected Environment) describes the ecosystem services provided by pollinators as well as their importance in agricultural systems. DePaolo et al. (2016) provided references to studies that show several factors contributing to a loss of pollinators due to wind turbines. However, they admit that the impacts of wind energy facilities on insects are poorly understood. Their seed-set experiment indicated that late-blooming flowering plants experienced pollen-limitation and may experience population declines should pollinators decline, and many flowering species in their survey are also present in the project area. However, due to a lack of quantitative data linking wind turbine–caused pollinator loss to a decline in pollination, this issue cannot be analyzed quantitatively. Others have also raised concern with early estimates of insect fatalities at wind energy facilities (e.g., Voigt 2021), but there is currently no evidence that direct mortality from wind turbine collisions poses a major threat to insect populations (Arcadis Belgium 2020). See Section 3.11.1.2.2 (Pollinators, Alternative B [Proposed Action]) for a detailed description of the potential impacts to pollinators from habitat alteration and loss, and displacement, injury, or mortality. This section also discloses the potential for declines in local pollinator populations to diminish the ecosystem services they provide. As described in this section, the siting of turbines to minimize impacts to bats (applicant-committed measures 136 and 138) may also reduce the risk of mortality for pollinators because insect migration routes and bat movement may be coincident. A number of other measures that would be implemented to minimize or avoid impacts to pollinators are also described in this section; a complete list is provided EIS Appendix 4 (Mitigation). These also include measures to prevent the introduction or spread of weeds and other invasive plants and measures to restore native revegetation communities during interim and final reclamation; additional details are provided in the Noxious Weed Management Plan (Appendix R in MVE [2023]) and the Reclamation Plan (Appendix E in MVE [2023]). These measures would help offset any adverse impacts to local pollinator populations and reduce the potential for impacts to herbivores and other animals that rely on these plants for food. All action alternatives would impact pollinators to some degree; however, due to a lack of appropriately designed studies, the degree of this impact is currently unknown and cannot be analyzed quantitatively. Arcadis Belgium. 2020. *Business and nature working together: action by the energy sector to protect wild pollinators*. Technical guidance prepared by Arcadis Belgium for the European Commission under contract No. 07.0202/2018/795538/SER/ENV.D.2 Technical support related to the implementation of the EU Pollinators Initiative.

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			DePaolo, S., D.E. Dillon, L.M. Tronstad, I.M. Abernathy, and M.D. Andersen. 2016. *Baseline Research for Long-Term Effects of Wind Energy on Insects, Plants, Birds and Bats in Wyoming: Final Report*. Report prepared for the Wyoming Bureau of Land Management by the Department of Zoology and Physiology, and the Wyoming Natural Diversity Database at the University of Wyoming. Available at: https://wyndd-reports.s3.us-west-2.amazonaws.com/U16DEP01WYUS.pdf. Access January 5, 2024.
11535-139	Steven Andersen	There has not bee sufficient consideration given to the BLM's own policy concerning disposal of public lands in relation to species such as the St. Anthony Sand Dune Tiger Beetle. While the DEIS purports to address the irreparable impacts caused to this BLM special-status species, it fails to adequately address and mitigate the net loss that will inevitably occur from the disposal of public land for the project. Specifically, as to BLM lands, it is BLM policy (6840.06C) to ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these (candidate) species as Threatened or Endangered. 409 Indeed, the disposal of public lands characterized by existing or potential beetle habitat would not be consistent with the BLM's guidance.410 Current concerns in the project area should preclude disposal,411 but the DEIS fails to take this into consideration.	None of the alternatives considered in the EIS include disposal of BLM lands; the BLM's purpose is to respond to MVE's application for a ROW grant. BLM Manual 6840.06 (BLM 2008) states, "Actions authorized by the BLM shall further the conservation and/or recovery of federally listed species and conservation of Bureau sensitive species." The manual's Glossary of Terms defines conserve as applied to BLM special-status species as "the use of programs, plans, and management practices to reduce or eliminate threats affecting the status of the species, or improve the condition of the species' habitat on BLM-administered lands" (BLM 2008). EIS Section 1.3 (Decision to be Made) describes the decision to be made by the BLM. EIS Section 3.3 (Avian and Bat Species), Section 3.11 (Pollinators and Insects), Section 3.15 (Vegetation), and Section 3.18 (Wildlife) describe potential impacts to BLM special-status species and the measures that would be implemented to minimize or avoid impacts to BLM special-status species. The St. Anthony sand dune tiger beetle (*Cicindela arenicola*) is discussed in EIS Section 3.11.2. EIS Appendix 4 (Mitigation) provides a complete list of mitigation measures, including potential compensatory mitigation for residual impacts to BLM special-status species. EIS Section 3.11.2.2.2 (Alternative B [Proposed Action]) discusses measures specific to the St. Anthony sand dune tiger beetle and EIS Section 3.11.2.5 (Compensatory Mitigation) discusses compensatory mitigation for this species.
11535-140	Steven Andersen	The DEIS dedicates only 3 and a half pages to the BLM special-status bumble bees, which includes the Western Bumble Bee (Bombus occidentalis). In doing so, the DEIS fails to address conservation efforts, including to the species' habitat, as well as the irreparable impact caused by the project. Currently, the Western Bumble Bee is currently under review for being listed as an endangered species, which the DEIS fails to include in its report. Bumble bees benefit in terms of species richness and abundance when there is a high abundance of nectar and pollen resources and a continuous availability of nectar throughout the season. Isolated patches of habitat, like those found in urban landscapes, have negative effects on species richness and abundance.415 These landscapes may not be sufficient to fully support B. occidentalis populations. Bumble bee populations may be negatively affected when nest sites and nectar and pollen sources are too isolated from one another. This occurs particularly in landscapes that include fragmented habitats, which the subject project would certainly cause. Even more, B. occidentalis mainly nests underground in abandoned rodent nests just below the surface, and therefore, the short period of observation conducted in the DEIS is insufficient to fully evaluate effects on this species. Isolated populations, caused by the project's fragmentation, may lead to a reduction of gene flow between the fragmented populations of plant species that depend on bumble bee visitation, which the DEIS did not consider.424 This, in turn, can cause a reduction of adequate gene flow between bumble bee colonies reliant on the plant species, and adequate gene flow in species helps to prevent inbreeding and maintain adaptive genetic variation.425 None of this was contemplated, and therefore mitigated, in the DEIS.	An updated status, discussion of conservation efforts, and potential for impacts to gene flow for western bumble bee has been incorporated into the final EIS. Additional minimization and mitigation measures and potential impacts have been incorporated into the final EIS.
11557-2	Deanna Weigel, Andy Weigel	several other proposed mitigation measures have no proven efficacy and/or rely on technology and methods that do not even exist currently. Examples include: Special-Status Plants: unproven treatment methods to restore dunes to suitable tiger beetle habitat	EIS Section 3.11.2.1 (St. Anthony Sand Dune Tiger Beetle, Affected Environment) discusses a study that was conducted in Idaho that evaluated the potential for restoration of dune habitats for tiger beetles with the selective application of herbicides to combat invasion of nonnative vegetation (Bouffard et al. 2009). The results of this pilot study demonstrated that application of imazapic has the potential to be an effective approach to reducing invasive annual grasses on sand dunes, while having little direct effect on beetles.
11598-13	Idaho Conservation League	Pollinators Insects have been found to have fatal interactions with wind turbines. While there are few studies that have been able to determine the exact impact of this energy infrastructure on pollinating insects, it appears that swarming and migrating arthropods are often killed by turbines. The DEIS cites one recent German study as attributing up to 40 million flying insect mortalities to a single turbine. Declines in insect populations can lead to a significant decline in the ecosystem services provided by these species, especially pollination. Additionally, much of 7 U.S. Dep't of Interior, Sec. Order No. 3362: Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors (Feb. 9, 2018). 8 Idaho Action Plan, Version 5.0 (IDFG, 2023) the habitat in the project area has been altered through many previously documented anthropogenic inputs. Nevertheless, several imperiled insects and polinator species are located in the analysis area, such as the monarch butterfly (IUCN Red-listed as endangered), St. Anthony Sand Dune Tiger Beetle (BLM special-species status) and Suckley's cuckoo/western bumble bees (BLM special-species status). With agriculture being the dominant land use near the project site, maintenance of healthy pollinator populations is especially important for the environmental and economic health of the area. ICL notes that simply improving habitat for pollinators or other sensitive insects within the project area may not be the best mitigation measure if these species may be harmed by turbine operations. We are pleased to see that MVE has proposed many actions associated with avoiding, minimizing, and in some cases providing compensatory mitigation, for impacts to pollinators and other insect species potentially impacted by the Lava Ridge project. ICL acknowledges that demonstrable results of a rigorous mitigation hierarchy may be difficult to ascertain, and suggests BLM and MVE look to the Xerces Society or similar pollinator focused organizations in developing meaningful mitigation.	The draft EIS incorporated several BMPs suggested by the Xerces Society in McKnight et al. (2018). These include the development of the Noxious Weed Management Plan (Appendix R in MVE [2023]) and avoidance of pesticides that are known to be toxic to bees and other pollinators (additional measure ccc). Two additional measures suggested by the Xerces Society (2018) were incorporated to the final EIS: 1) Use seed mixes that will ensure at least three different flowering species are blooming throughout the growing season. Use seed mixes that have a combination of wildflowers, succulents, thistles, perennial bunchgrasses, and shrubs; and 2) during interim and final reclamation, scatter slash collected during vegetation clearing and maintain or leave some undisturbed naturally occurring bare ground to provide microhabitats for ground-nesting bees (additional measure ll).
11871-4	WildLands Defense	Insects receive no surveys, despite wind turbines causing the death of very large numbers of insects.	During the development of the EIS, the BLM assessed the adequacy of baseline technical reports and accompanying data provided by MVE to confirm that the information is adequate to address EIS technical

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			analysis requirements. This included the identification of data gaps and development of additional technical studies to address these needs. Through this process, the BLM obtained information on insects with the potential to occur in the siting corridors through a background literature search and coordination with IDFG. The information obtained through this process was sufficient to generally characterize the existing conditions for pollinators and other insects as described in EIS Section 3.11.1.1 (Pollinators, Affected Environment). Due to the potential for impacts to the St. Anthony sand dune tiger beetle, a BLM special-status species, the BLM determined that preconstruction baseline resource surveys for the species were warranted; the results of these surveys are summarized in EIS Section 3.11.2.1 (St. Anthony Sand Dune Tiger Beetle, Affected Environment). Although the agency scoping process and early coordination with IDFG did not identify a need for preconstruction baseline resource surveys for other BLM special-status insects, the BLM received a number of comments during the public scoping period that expressed specific concerns regarding the potential impacts to the monarch butterfly (a candidate for ESA listing and BLM special-status species) and BLM special-status bumble bees. In response to these comments, the BLM conducted additional analysis for these species (see EIS Section 3.11.3 [Monarch Butterfly] and EIS Section 3.11.4 [Bureau of Land Management Special-Status Bumble Bees]) and determined that additional measures to minimize or avoid impacts to these species were warranted. Specifically, additional measure zz, stipulates that "MVE would conduct preconstruction surveys for milkweed and monarchs (including both eggs/larvae on milkweed and adult monarchs) in infrastructure and work areas from May through October." Because other pollinators use habitats similar to the monarch butterfly, additional preconstruction baseline resource surveys for pollinators and other insects are not warranted. Incidental surveys for presence of sensitive pollinators would be implemented through the Environmental Compliance and Monitoring Plan, which would help inform the development of BMPs during construction (see additional measure ddd).
11871-28	WildLands Defense	Potential lethal impacts to, or disruption of, insect migrations: https://www.mdpi.com/2071-1050/14/23/16186 "When migrating insects reach maturity, and as soon as wind direction, wind speed, air temperature and season match with their intrinsic behavior patterns, they ascend above the turbulent surface layer of the atmosphere, which varies in height between 40 and 100 m above ground level [20]. There, they find strong, directional, undisturbed winds that they can use as transport vehicle to get to their preferred mating, breeding and feeding grounds, which contradicts the general assumption that flying insects are intrinsically safe from being captured by modern wind rotors that stand higher than their presumed flight boundary layer. Furthermore, it is likely that for efficiency reasons, insects do not rise much higher than necessary to find strong winds. This is the same reasoning that has motivated wind power developers to place rotors just above the turbulent surface layer. It is unsurprising that migrating insects and wind rotors sooner or later meet at the same places. Damaged insects have been found within wind farms, and in-depth analysis of related impacts and countermeasures [21]." Further: "Insect impingement is not a fiction; during the past 30 years, a considerable scientific and industrial effort has been dedicated to the development of rotor blade surfaces that resist erosion by airborne particles and the adherence of residues from such impacts. Erosion of the blade's leading edge reduces the economic lifetime of a wind farm, and residues sticking to the blade surface reduce the efficiency of power generation [35,36]. Particles under assessment include ice, sand and flying insects. In order to understand the phenomenon and to identify mitigating measures, part of the literature is dedicated to the quantification of insect impacts. Such studies quantify the "insect collection efficiency" of airfoils and the "rupture velocity" of insects as a function of their size and of the airfoil design [32,33,37]".	The potential for pollinators and other insects to experience injury or mortality from collisions with operational turbines is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts); see also EIS Section 3.11.3.2 (Monarch Butterfly, Impacts) and EIS Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). The EIS does not assume that that pollinator and other insect mortality would be reduced by taller turbines; conversely the potential for species that migrate at high altitudes to experience increased mortality from turbine collisions (while gaining or losing altitude) is described in EIS Section 3.11.3.2. As described in EIS Section 3.11.1.2, the siting of turbines to minimize impacts to bats (applicant-committed measures 136 and 138) may also reduce the risk of mortality for pollinators because insect migration routes and bat movement may be coincident. This section describes a number of other measures that would be implemented to minimize or avoid impacts to pollinators. Specific measures that would be implemented to minimize or avoid impacts to monarch butterflies and BLM special-status bumble bees are discussed in EIS Section 3.11.3.2 and Section 3.11.4.2, respectively. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
11871-29	WildLands Defense	Strong evidence suggests that insect migration routes cross existing wind farm sites, and the height of insect migration over the ground coincides at least partially with the height of modern wind rotors [21,23,24,25,29]. Prominent examples that are possibly affected include the painted lady butterfly travelling between central Africa and Europe [17] and the monarch butterfly travelling between Mexico, the United States and Canada [26].	The potential for pollinators and other insects to experience injury or mortality from collisions with operational turbines is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts); see also EIS Section 3.11.3.2 (Monarch Butterfly, Impacts) and EIS Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). EIS Section 3.11.1.2 specifically discloses the potential for insect migration routes to overlap with wind energy facilities because of the wind currents that both rely on. EIS Section 3.11.3.2 specifically discloses impacts to migrating monarch butterflies. As described in EIS Section 3.11.1.2, the siting of turbines to minimize impacts to bats (applicant-committed measures 136 and 138) may also reduce the risk of mortality for pollinators because insect migration routes and bat movement may be coincident. This section describes a number of other measures that would be implemented to minimize or avoid impacts to pollinators. Specific measures that would be implemented to minimize or avoid impacts to monarch butterflies and BLM special-status bumble bees are discussed in EIS Section 3.11.3.2 and EIS Section 3.11.4.2, respectively. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
11871-30	WildLands Defense	Damage to wind turbines caused by flying insects has been reported since the beginnings of wind power industry [32,36,40,42,46]. Since then, intensive efforts to avoid insect erosion and fouling of rotor blades have solved the problem of insect impingement for the wind industry but not for insects. At first glance, mitigation measures to protect insects from impingement seem feasible and affordable, and related losses of wind energy seem to be acceptable. We conclude that international energy policy and environmental protection standards should be adopted to understand and mitigate the impacts of wind power generation on flying insect populations".	The potential for pollinators and other insects to experience injury or mortality from collisions with operational turbines is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts); see also EIS Section 3.11.3.2 (Monarch Butterfly, Impacts) and EIS Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). The only mitigation measure discussed in the referenced article (Thess and Lengsfeld 2022) is the hypothetical use of LiDAR to detect approaching insect swarms and curtail turbines to avoid collisions. However, there are no references to any studies evaluating the feasibility or effectiveness of this potential mitigation measure. EIS Section 3.11.3.2 describes the measures that would be implemented to minimize or avoid impacts to pollinators. Specific measures that would be implemented to minimize or avoid impacts to monarch butterflies and BLM special-status bumble bees are discussed in EIS Section 3.11.3.2 and EIS Section 3.11.4.2, respectively. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation). These include

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			proactive measures to site turbines away from areas that may support higher concentrations of pollinators and other insects. Thess, A.D., and P. Lengsfeld. 2022. Side Effects of Wind Energy: Review of Three Topics–Status and Open Questions. *Sustainability* 14:16186.
11871-31	WildLands Defense	"Insect fatalities at wind turbines as biodiversity sinks" Christian C. Voigt,26 January 2021 https://doi.org/10.1111/csp2.366 " a single turbine located in the temperate zone might kill about 40 million insects per year. Furthermore, Scheimpflug Lidar measurements at operating wind turbines confirm a high insect activity in the risk zone of turbines". As swarming and migration are linked to mating and dispersal, respectively, fatalities at wind turbines may have profound effects on insect populations at various spatial scales. Some insects, such as hill-topping butterflies, may occur only in small populations at a local scale. Placing wind turbines close to these populations or to the corresponding mating areas of these insects, for example on a mountain ridge or hilltop (Figure 2), may largely affect local populations. In addition, decline of insect populations may also diminish their ecosystem function, including services like pollination. Currently, we lack data on how siting of wind turbines affect insect fatalities at turbines and thus, how turbine siting may impact local insect diversity and associated ecosystem functions. Migrating insects may get in contact with wind turbines when moving at aerial layers that are also suitable for wind energy production. A high fatality rate of migratory insects at wind turbines may have negative consequences for distant insect populations. However, it seems challenging to quantify the effect of turbine-related fatalities on populations of migratory insects because of the intrinsic difficulty in establishing connectivity between the site where insects are killed and the corresponding source populations. It is noteworthy that insect–wind turbine interactions may also affect predators hunting for insects at turbines. Aerial insectivores such as bats are well known for searching and hunting insects in proximity to wind turbines (Foo et al., 2017; Horn, Arnett, & Kunz, 2008; Johnson, 1957; Roeleke, Blohm, Kramer-Schadt, Yovel, & Voigt, 2016; Valdez & Cryan, 2013). Rydell and colleagues argued that the findings of diurnal flies in the stomachs of bat carcasses collected below wind turbines is indicative of bats hunting for flies resting on turbine structures (Rydell et al., 2016). Furthermore, it was argued that bat mortality at wind turbines is linked to insect migration in northern Europe (Rydell et al., 2010). Thus, insect attraction to wind turbines may impact trophic links associated with these insects, such as insect-mediated ecosystem functions and aerial predation of these insects at wind turbines. Concluding, interactions of insects with wind turbines have multifaceted consequences that reach across trophic levels and over larger spatial scales'.	The potential for pollinators and other insects to experience injury or mortality from collisions with operational turbines is disclosed in EIS Section 3.11.1.2 (Pollinators, Impacts); see also EIS Section 3.11.3.2 (Monarch Butterfly, Impacts) and EIS Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). This includes a discussion of the conclusions in Voigt (2021). Voigt, C.C. 2021. Insect fatalities at wind turbines as biodiversity sinks. Conservation Science and Practice. Available at: https://www.researchgate.net/publication/348790564_Insect_fatalities_at_wind_turbines_as_biodiversity_sinks. Accessed December 29, 2023.
11978-38	Magic Valley Energy, LLC	Section 3.11.2.2.2 – St. Anthony Sand Dune Tiger Beetle Impacts (Alternative B) 35. The DEIS states: "The project would affect St. Anthony sand dune tiger beetle habitat and populations through habitat alteration and loss (from work areas and placement of infrastructure and dune stabilization from expansion of nonnative vegetation) and injury or mortality (vehicle strikes and crushing of individuals by workers or construction equipment)." a. MVE Comment: Using the logic presented in the comments above, the Project would not be expected to affect individuals or populations of tiger beetles given the 0.5 mile buffer between occupied or good habitat and siting corridors and given the one instance of potential habitat fragmentation is only applicable to an area that is already isolated from any surrounding marginal or good habitat, thus unlikely to host tiger beetles. As such, MVE requests that the above-quoted language be removed in the FEIS. Further, applicant-committed measures that protect tiger beetles and their habitat will be implemented (i.e., where possible MVE will survey to mark for avoidance to sand dune tiger occupied and good habitat, to the extent feasible MVE will avoid newly identified occupied habitat, MVE will use silt fencing within 0.6 miles of occupied and good habitat, and MVE will implement a noxious weed plan). When analyzed collectively, this would remove the need for BLM-required additional measures (DEIS Appendix 4 Measures hh, ii, mm, nn) and tiger beetle related compensatory mitigation (DEIS Appendix 4 measures III, IV, and V), and MVE requests that these measures be removed in the FEIS.	While the BLM appreciates MVE's applicant-committed measures to minimize or avoid impacts to the St. Anthony sand dune tiger beetle and its habitat, all of the action alternatives would involve ground disturbance in mapped good and marginal habitat. All action alternatives also involve the placement of project infrastructure within potential dispersal habitat for the species. Since MVE has not committed to complete avoidance of all potential habitat and dispersal areas for the species, the EIS must disclose the potential for the action alternatives to cause habitat alteration, loss, and fragmentation, as well as the potential for direct injury and mortality. As described in EIS Section 3.11.2.1 (St. Anthony Sand Dune Tiger Beetle, Affected Environment), protection of smaller, isolated dunes like those present in the analysis area may be integral to the long-term preservation of the species. Because MVE has not committed to complete avoidance of these sensitive areas, the BLM has determined that additional measures need to be implemented to meet the BLM's obligation to ensure its decisions do not contribute to a loss of population viability or trend toward federal listing for any BLM special-status species. These additional measures are discussed in Section 3.11.2.2.2 (St. Anthony Sand Dune Tiger Beetle, Alternative B with Additional Measures); see also EIS Appendix 4 (Mitigation). As described in EIS Section 3.11.2.5 (St. Anthony Sand Dune Tiger Beetle, Compensatory Mitigation), with the implementation of these applicant-committed measures and additional mitigation, impacts to St. Anthony sand dune tiger beetle would be largely minimized or avoided. Compensatory mitigation would only be considered in the event that MVE determines complete avoidance is not feasible.
11978-39	Magic Valley Energy, LLC	36. The DEIS states: "The majority of project components would be located outside mapped St. Anthony sand dune tiger beetle habitat. The nearest turbine siting corridor would be approximately 0.15 mile south of the nearest mapped marginal habitat and approximately 0.5 mile southeast of the nearest mapped good habitat. St. Anthony sand dune tiger beetle individuals have been observed in both of these areas." a. MVE Comment: This language could be interpreted to mean that the beetles have been observed in the Project siting corridors, which is not the case. It should be noted that the siting corridors are 0.5 mi from the nearest occupied habitat (based on WEST and historical data records), and that beetles were only observed in habitat classified as good (veg cover <20%). Based on WEST's 2021 St. Anthony Sand Dune Tiger Beetle Memo ("2021 Memo") and historical Idaho Fish and Game (IDFG) data records (referenced in the 2021 Memo), the siting corridors are 0.5 miles from the nearest habitat classified as occupied habitat, and beetles have only been historically observed in habitat classified as good, where vegetation cover is noted as less than 20%. According to the 2021 Memo, some areas where the species was previously known to occur may no longer be suitable for the species due to disturbance resulting from clearing vegetation along the highway. MVE is requesting a change in FEIS to note that only good habitat is known to contain populations of St. Anthony Sand Dune Tiger Beetle, and siting corridors are 0.5 miles from the nearest occupied habitat.	The EIS has been updated to clarify that St. Anthony sand dune tiger beetles have not been observed within the siting corridors, and that the nearest occupied habitat is located 0.5 mile outside of the nearest siting corridor.
11978-40	Magic Valley Energy, LLC	37. The DEIS states: "No new access roads would be constructed within mapped St. Anthony sand dune tiger beetle habitat, though one new access road, connecting ID 24 and Owinza Road, would be constructed between	As described in EIS Section 3.11.2.1 (St. Anthony Sand Dune Tiger Beetle, Affected Environment), this species' known dispersal distance is 0.75 mile. Because not every dune area within 0.75 mile of the siting corridors was

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		areas of poor and marginal mapped habitat south of ID 24 and marginal habitats located north of ID 24. No St. Anthony sand dune tiger beetle individuals have been recorded in these habitat areas; however, construction of the access road would contribute to fragmentation of dispersal areas between mapped habitats and may result in direct mortality of dispersing individuals if present in the mapped habitat areas adjacent to the new access road during construction and operation." a. MVE Comment: The one fragment of marginal habitat that would be separated from poor habitat by the new access road is unlikely to have a tiger beetle population, given that it is not classified as good habitat – which is the only classification of habitat that the 2021 Memo mentioned as having tiger beetle present during the survey efforts. In addition, this specific marginal habitat area is greater than 0.5 miles from any other marginal habitat, making it isolated and even less likely to be used by the beetles. As such, the new access road would not have an impact on occupied or good habitat; therefore, the DEIS statement quoted above should be removed as the new road construction given in the DEIS is unlikely to have any impact on habitat fragmentation within an area already unlikely to contain tiger beetles.	subject to species-specific survey and field habitat evaluation, the draft EIS must assume that there is the potential for individuals to be present anywhere potentially suitable habitat for this species is present, and account for potential impacts to dispersing individuals. Additionally, the noted marginal habitat that would be separated from adjacent poor habitats by the proposed access road would be within 0.75 mile of other marginal habitats; therefore, it is reasonable to assume that dispersal may occur.
11978-129	Magic Valley Energy, LLC	31. Section 3.11.1.1 - Pollinators and Insects - Affected Environment "Wild pollinators, such as the monarch butterfly (Danaus plexippus) (see Section 3.11.3 [Monarch Butterfly]) and a number of bumble bee species (see Section 3.11.4 [BLM Special-Status Bumble Bees]), are in decline (Idaho State Department of Agriculture 2016)." MVE requests the language be updated. The correct scientific name for the monarch butterfly is Danaus plexippus plexippus.	The EIS follows BLM, USFWS, and IDFG naming conventions, all of which list the monarch butterfly as "*Danaus plexippus*." Therefore, this change was not made in the final EIS.
11978-130	Magic Valley Energy, LLC	32. Section 3.11.2.3 - Pollinators and Insects - Irreversible and Irretrievable Commitments and Short Term Uses Versus Long Term Productivity "These effects would occur during the 34- year life of the project but would not be considered irreversible because the majority of existing tiger beetle habitat would be unaffected by the project and because the small number of individuals that may be killed would not be unlikely to result in a trend toward federal listing under the ESA or a loss of population viability." MVE requests the double negative be removed for clarification: "These effects would occur during the 34-year life of the project but would not be considered irreversible because the majority of existing tiger beetle habitat would be unaffected by the project and because the small number of individuals that may be killed would not be likely to result in a trend toward federal listing under the ESA or a loss of population viability."	Typo corrected.
11978-169	Magic Valley Energy, LLC	Section 3.11.2.1 – St. Anthony Sand Dune Tiger Beetle Affected Environment 34. MVE Comment: The depiction of poor habitat for St. Anthony Sand Dune Tiger Beetle in Figure 3.11-3 and any surrounding language should be removed since the analysis area given in the DEIS for St. Anthony sand dune tiger beetle is defined by good and marginal habitat for the species plus the area within 0.75 mile of this suitable habitat.	While the analysis area for the St. Anthony sand dune tiger beetle is based on a buffer (of 0.75 mile) around good and marginal habitat for the species, the impact indicators used to analyze this issue include "acres of ground disturbance in St. Anthony sand dune tiger beetle habitat," which includes acres of ground disturbance in poor habitat that falls within the analysis area. This change was not made in the final EIS.
12085-1	Richard Dinges	No where in the Bureau of Land Management's (BLM) draft Environmental Impact Statement (EIS) for the Lava Ridge wind turbine project is the effect of anthropogenic noise on terrestrial invertebrates considered. Terrestrial invertebrates use sound for mating activities, communicating with each other, for predator- prey dynamics, movement, habitat selection and physiology. There will be various sound wave frequencies generated during the construction phase from vehicles, construction equipment, blasting for tower bases, to name a few. Also, the blasting activity will generate substrate-borne anthropogenic noise. During wind turbine operation, anthropogenic noise will be generated by the wind turbines and the associated maintenance and operational activities. Nature always seeks a balanced ecosystem. If the effects of the Lava Ridge project on terrestrial invertebrates are not considered, an imbalanced ecosystem could bring serious consequences. One hallmark of this EIS is that although it goes into great detail about what the fatality rate may be of bats, birds, raptors, and pollinators, it never considers what the overall effect is on the ecosystem.	One study by Velilla et al. (2021) found that vibrational noise from operational turbines reduced earthworm abundance; however, this effect decreased with distance and was most pronounced within 32 to 64 m (105 to 210 feet). Further, the authors noted there were no similar sites nearby without wind turbines to serve as a control for the study; thus, it is impossible to determine how earthworm abundance in areas impacted by wind development compares to earthworm abundance in undeveloped areas. It is also unclear whether these findings are applicable to other similar size invertebrates, and the study noted that vibrational noise had no effect on smaller invertebrates. Even if the abundance of some terrestrial invertebrates is reduced within 210 feet of turbine bases, these effects would be limited to no more than 1,400 acres under any action alternative (3.5 acres per turbine [20-foot turbine diameter plus 210-foot disturbance buffer] × 400 turbines under Alternative B). Other project-related noise (such as blasting and construction activities) would be short term and localized to the immediate vicinity of active work areas. Given the short-term nature of most noise and vibration impacts and the very small area where terrestrial invertebrates could experience long-term effects from noise and vibrations, a more detailed analysis is not warranted. Velilla, E., E. Collinson, L. Bellato, M.P. Berg, and W. Halfwerk. 2021. Vibrational noise from wind energy-turbines negatively impacts earthworm abundance. *Oikos* 130(6):844–849. Available at: https://www.researchgate.net/publication/351143039_Vibrational_noise_from_wind_energy-turbines_negatively_impacts_earthworm_abundance?__cf_chl_tk=z1WsOG1MvE50plfOMclTY4guR8KhLyyKOTtJx..lIdE-1703807635-0-gaNycGzNEbs. Accessed December 28, 2023.
12085-4	Richard Dinges	Also, the effect of electromagnetic field (EMF) on the terrestrial invertebrates must be evaluated. There will be 56 miles of buried cable generating ground level EMF. During construction, significant 4 and 5 g cell phone activity will also take place generating high frequency EMF. My comments on the anthropogenic noise impact is based on a paper by Maggie Raboin and Damian O. Elias titled "Anthropogenic noise and the bioacoustics of terrestrial invertebrates". The link to the paper is enclosed. Of particular interest is a paper referenced in the above paper by Losely, J.E. and Vaughan, M. (2006). The economic value of ecological services provided by insects. The Lava Ridge wind project encompasses almost 200,000 acres of public lands and abuts and surrounds private lands which are mostly irrigated and grow a wide variety of crops. Thus the effect of this wind project on this entire area's ecosystem must be considered.	While the publicly available literature indicates that EMF radiation may impact invertebrate activity (Friesen and Havas 2019; Levitt et al. 2022; Wyszkowska et al. 2019), the literature also indicates that the EMF radiation levels at ground level beneath high-voltage (i.e., 500-kV) transmission lines and above buried medium-voltage (i.e., 230-kV) electrical cables is typically far below the threshold required to induce physiological or behavioral changes, but that flying insects within 1 m (3.3 feet) of high-voltage transmission lines may be affected (Middleton and Barnhart 2023; Wyszkowska et al. 2016). Buried collector lines would be much lower voltage (i.e., 34.5-kV), and the surrounding soil would provide insulation from EMF radiation. Therefore, it is unlikely that EMF radiation from buried collector lines (or new overhead collector and transmission lines) would have a measurable impact on terrestrial invertebrates. Higher frequency EMF radiation from modern 4G and 5G cell phone towers has been shown to effect flying invertebrates (i.e., bees) at greater distances (within 500 m [1,640 feet]) (Taye et al. 2017); effects from the EMF radiation emitted by cellphones require prolonged, close contact with the device (Panagopoulos et al. 2006). Since none of the alternatives include construction of cell towers, there would be no impacts to terrestrial invertebrates from EMF radiation associated with cellphones. Given the

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			low potential for impacts to terrestrial invertebrates from EMF radiation, a more detailed analysis is not warranted. Friesen, M., and M. Havas. 2019. Effects of non-ionizing electromagnetic pollution on invertebrates, including pollinators such as honey bees: what we know, what we don't know, and what we need to know. In *Working Landscapes. Proceedings of the 12th Prairie Conservation and Endangered Species Conference, February 2019, Winnipeg, Manitoba*, edited by D. Danyluk, pp. 127–138. Critical Wildlife Habitat Program, Winnipeg, Manitoba. Available at: https://stopsmartmetersbc.com/wp-content/uploads/2021/02/Effects-of-Non-ionizing-Electromagnetic-Pollution-on-Invertebrates-including-Pollinators-such-as-Honey-Bees-What-We-Know-Dont-and-Need-to-by-Margaret-Friesen-and-Magda-Havas-February-09-2021.pdf. Accessed January 5, 2024. Levitt, B., H.C. Lai, and A.N. Manville II. 2022. Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. *Frontiers in Public Health*. Available at: https://www.frontiersin.org/articles/10.3389/fpubh.2022.1000840/full. Accessed December 19, 2023. Middleton, P., and B. Barnhart. 2023. *Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to Electromagnetic Frequencies from Buried Transmission Cables*. OCS Study BOEM 2023-007. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management. Panagopoulos, D., E.D. Chavdoula, I.P. Nezis, and L.H. Margaritis. 2006. Cell death induced by GSM 900-MHz and DCS 1800-MHz telephony radiation. *Mutation Research/Genetic Toxicocolgy and Environmental Mutagenesis* 626(1–2):69–78. Available at: https://doi.org/10.1016/j.mrgentox.2006.08.008. Accessed January 19, 2024. Taye, R.R., M.K. Deka, A. Rahman, and M. Bathari. 2017. Effect of electromagnetic radiation of cell phone tower of foraging behaviour of Asiatic honey bee, Apis cerana F. (Hymenoptera: Apidae). *Journal of Entomology and Zoology Studies* 5(3):1527–1529. Available at: https://www.entomoljournal.com/archives/2017/vol5issue3/PartU/5-3-142-590.pdf. Accessed December 19, 2023. Wyszkowska, J., S. Shepherd, S. Sharkh, C.W. Jackson, and P.L. Newland. 2016. Exposure to extremely low frequency electromagnetic fields alters the behaviour, physiology, and stress protein levels of desert locusts. *Scientific Reports* 6:36413. Available at: https://doi.org/10.1038/srep36413. Accessed January 19, 2024. Wyszkowska, J., P. Grodzicki, and M Szczygiel. 2019. Electromagnetic fields and colony collapse disorder of the honeybee. *Przeglad Elektrotechniczny* 95(1):137–140. Available at: https://doi.org/10.15199/48.2019.01.35. Accessed January 19, 2024.
12950-3	Susan Stacy	Comment No. 3. Native species of Bombus. (Bumblebees) I am not persuaded that the impact of the proposed project on native species of bumblebees is well understood or likely to be mitigated if the impact is negative.	EIS Section 3.11.4.2.2 (Alternative B [Proposed Action]) discloses that the project would have negative impacts on bumble bees. The final EIS has been revised to include additional mitigation measures for pollinators, such as specific seed mix requirements that would benefit these species (see additional measure ll).
1453-1	Tammy Foster	I have done a bit of research regarding the dwindling honeybee population. This is a very important subject for our agriculture and the local people who raise their own produce, and the need for honeybees to pollinate all plants. The population of Honeybees has dwindled far enough that farmers and gardeners are having trouble with the pollination of their corps. I read an article about the effect of windmill noise and vibrations, some audible to humans and others that are not audible to humans. The vibrations can travel much farther than audible sound and affect a vast area several miles from the wind farm itself. Downwind those low frequency vibrations can travel 50 KM from the source. In a report by H W Kircher titled Acoustical Communication of Honeybees, he finds the airborne sounds and vibrations play an important role in Honeybee communication. The article also states It come to light that Honeybees use sound and vibrations similar to sonar used by marine life and bats. Since vast areas are within affective range of low frequency sound levels emitted by wind farms, it is clear that there is a connection between low frequency sound produced by the wind turbines and the disappearance of Honeybees. The area with the most disappearance of Honeybees directly corresponds with that of operating wind farms.	The BLM is unaware of peer-reviewed literature documenting low-frequency noise from wind turbines traveling 50 km from the source; noise generally dissipates at rate of 6 dB for every doubling in distance. Thus, noise is expected to reach a level between 27 and 33 dB (background noise in a rural setting) between 1.2 and 2.4 km from each turbine. While the frequency range of acoustic communication by honeybees overlaps with the low-frequency sounds emitted by operation wind turbines, the BLM is not aware of peer-reviewed literature documenting impacts to honeybees from turbine noise.
3873-1	Julie DeWolfe	After examining the volumes online and doing word searches in Volume 1, Volume 2a, Volume 2b, and Volume 3, I was unable to find thorough scientific examination of subterranean species, specifically earth worms, if I have missed that section please direct me to the impact study of Arcteonais lomondi Aulodrilus americanus Aulodrilus limnobius Aulodrilus pigueti Aulodrilus pluriseta Chaetogaster diaphanus Chaetogaster diastrophus Dero digitata Dero furcata Driloleirus americanus Haplotaxis gordioides Ilyodrilus templetoni Kincaidiana hexatheca Limnodrilus claparedeianus Limnodrilus hoffmeisteri Limnodrilus profundicola Limnodrilus silvani Limnodrilus udekemianus Nais barbata Nais behningi Nais bicuspidalis Nais bretscheri Nais communis Nais elinguis Nais pardalis Nais simplex Nais variabilis Ophidonais serpentina Pristina aequiseta Pristina jenkinae Pristina leidyi Pristina osborni Quistradrilus multisetosus Rhyacodrilus coccineus Rhyacodrilus montana Rhyacodrilus sodalis Rhynchelmis diespluviae Rhynchelmis elrodi Rhynchelmis gustafsoni Rhynchelmis monsserratus Rhynchelmis rostrata Rhynchelmis utahensis Rhynchelmis yakimorum Slavina appendiculata Specaria josinae Spirosperma ferox Spirosperma nikolskyi Stylaria lacustris Stylodrilus heringianus Telmatodrilus vejdovskyi Tubifex tubifex Uncinais uncinate As listed on the Idaho Official Government Website for Idaho Fish and Game. https://idfg.idaho.gov/species/taxa/class/Animalia/Annelida/Oligochaeta <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fidfg.idaho.gov%2Fspecies%2Ftaxa%2F	As described in the response to comment 3873-2 (see in Table A-3t, Pollinators and Insects), impacts from noise and vibration would be temporary and highly localized. Additional short-term impacts could occur in work areas due to direct mortality or habitat alteration from ground disturbance, but earthworms would be expected to return to disturbed soils following construction (Vellila et al. [2021] found that soil conditions were not correlated with earthworm abundance). Given the short-term nature of most effects to earthworms and the highly localized nature of potential long-term effects (see comment 12085-1 in Table A-3t, Pollinators and Insects), a more detailed analysis is not warranted.

Comment ID	Commenter	Public Comment	Response to Comment
		class%2FAnimalia%2FAnnelida%2FOligochaeta&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8b8a67bf619647325a6d08db19e346ac%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638132236188915127%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=A12KQ4kyca6vlaHZ9s2NsK5B2XOBBFqonMY7e7PPlBg%3D&reserved=0> The afore mentioned may not at this time be considered threatened, but The Lava Ridge Wind Project Draft Environmental Impact Statement does not identify, examine, or project how the proposed project(s) may directly affect populations of, or the cycle of ecology wherein these naturally occurring species may be impacted.	
3873-2	Julie DeWolfe	"A major contributing source of anthropogenic vibrational noise comes from wind energy turbines, which are mainly found in rural or farming areas and sometimes cover a large land surface. The blades, the rotor and the shafts from wind turbines are supported by a tower that is usually anchored to a heavy concrete and steel rebar platform reaching up to nine meters in depth (Stammler and Ceranna 2016). These platforms are needed to withstand the weight of the turbine, and although they may additionally reduce some of the vibrational noise created by the turbine, they induce vibrations in the soil, mostly in the low frequency range <500 Hz (Stammler and Ceranna 2016). So far, we have little knowledge on how wind-turbine generated noise affects soil animals 4 The potential impact of noise on animals may depend on the overlap between an animal's body size and the spectral distribution of the vibrations that travel through the soil. Vibrations generated by wind energy turbines are typically low in frequency (< 500 Hz) and small-bodied animals (mesofauna, < 10 mm in size) might not be able to perceive, or even experience any strain from these low-frequency waves. Larger soil animals (macrofauna, > 1 cm in size), however, might be able to perceive low-frequency vibrations and can therefore be impacted by turbine noise through a perceptual mechanism. Among macrofauna, earthworms are particularly sensitive to low-frequency vibrations as they use vibrational cues to detect approaching predators (Catania 2008, Farina 2014). Earthworms are crucial ecosystem engineers (Jones et al. 1997) that are well known to influence soil structure, hydrology and nutrient quality as well as plant production (Clements et al. 1991, Van Groenigen et al. 2014, Bertrand et al. 2015). Vibratory noise from turbines may either mask, or mimic vibratory cues produced by approaching predators, such as moles, and earthworms may surface in response (Catania 2008, Dominonllai et al. 2020). An increased perception of predation pressure, or decreased response to predatory cues could both lead to a decline in earthworm abundance in areas with high vibrational noise, consequently affecting soil structure, water infiltration, nutrient cycling, carbon sequestration and more (Blouin et al. 2013, Bertrand et al. 2015)." https://www.researchgate.net/publication/351143039_Vibrational_noise_from_wind_energy-turbines_negatively_impacts_earthworm_abundance <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.researchgate.net%2Fpublication%2F351143039_Vibrational_noise_from_wind_energy-turbines_negatively_impacts_earthworm_abundance&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8b8a67bf619647325a6d08db19e346ac%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638132236188915127%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=1%2FpDgsFWcCyWJf%2FC4nwrY0UaXT5vWpaw1oyAVB%2BECWU%3D&reserved=0> "Snails and other arthropods have vibration receptors along the entire body surface. Snakes, spiders, earth and slow worms, flies, ticks, mites, these and many more tiny creatures depend on vibrations to live and function, and significant change could devastate them." https://www.wind-watch.org/documents/unrecognised-wind-turbine-threat/ <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wind-watch.org%2Fdocuments%2Funrecognised-wind-turbine-threat%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C8b8a67bf619647325a6d08db19e346ac%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638132236188915127%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=80CevAhK8E1wwu8%2FkbaMx8URBdToLA%2B%2BORPuEjfgBu8%3D&reserved=0> While we may view worms as lowly, many have done the research elsewhere and come to troubling conclusions that wind turbines are harmful to the lifecycle of earthworms, in turn when worms are harmed, killed, or removed from the environment it is quite clear that all of the life cycles that depend upon them will be negatively impacted. It is vitally important that we protect the balance of nature in our delicate high desert. It would be irresponsible to move forward with any project without studying the impact of turbine vibration on the lifecycle of worms.	Dean (2007) referenced in the comment raises concerns about the lack of study of the effects of vibrations from wind turbines but provides no empirical evidence that these vibrations negatively affect earthworms and other terrestrial invertebrates. See response to comment 12085-1 (see in Table A-3t, Pollinators and Insects) regarding the Velilla et al. (2021) study. Dean, D. 2007. Unrecognised wind turbine threat to soil structure, flora, and fauna. Available at: https://www.wind-watch.org/documents/unrecognised-wind-turbine-threat/. Accessed December 28, 2023. Velilla, E., E. Collinson, L. Bellato, M.P. Berg, and W. Halfwerk. 2021. Vibrational noise from wind energy-turbines negatively impacts earthworm abundance. *Oikos* 130(6):844–849. Available at: https://www.researchgate.net/publication/351143039_Vibrational_noise_from_wind_energy-turbines_negatively_impacts_earthworm_abundance?__cf_chl_tk=z1WsOG1MvE50plfOMclTY4guR8KhLyyKOTtJx..IIdE-1703807635-0-gaNycGzNEbs. Accessed December 28, 2023.
4772-1	Dean Dimond	Has the BLM considered the effect the windmills will have on Bees? Native bees are at risk of extinction. As a important part of my farm operation I have bee hives on my farm. One of the reason the bee hives on my place is so productive is because bees not only have my crop ground to feed from (and pollinate) But they also have the desert to feed from.They travel up to 5 miles from there hives. Bee are important part of our ecosystem. Native bees need there natural food source to survive and they do not adapt well to changed forage. Much of there natural forage will be destroyed during the construction of the windmills. I have been driving for many years and when I drive across a large open desert I hit and kill bees with my vehicle. This happens at a much higher rate the the faster you go. With the increase in traffic and roads the death rate will go up. With the windmills blades turning 200mph the death rate will sky rocket! Like I said earlier, native bees are at risk of extinction. Is the BLM going to issue a "Take" permit for the bees? Please protect our bees choose Alternate A!!!!!!!	Impacts to bees and other pollinators are described in EIS Section 3.11.1 (Pollinators); impacts to BLM special-status bumble bees are described in EIS Section 3.11.4 (Bureau of Land Management Special-Status Bumble Bees). Both sections describe the measures that would implemented to avoid or minimize impacts to bees and pollinators (see EIS Appendix 4 [Mitigation] for a complete list of mitigation measures). Take permits are only issued for species listed as threatened or endangered under the ESA. There is no species of bee that occurs in Idaho listed under the ESA; thus, no take permit can be issued for bees here.
5900-1	Name Not Provided	Insect fatalities: Your DEIS analysis of insects seems largely focused on pollination and extinction concerns (see Lava Ridge DEIS V 1. 3.11.1.1 Affected Environment) if I have missed the analysis of the hundreds of	EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) defines irreversible and irretrievable commitments, which are related to the duration of the impact

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		common ground dwelling insects, specifically that section on common beetles, their environment, and the impact of wind turbines on the more common species that are not threatened or strong pollinators, do direct me to that. You readily admit that the damage done to pollinators may have an irreversible and irretrievable end (3.11.1.3 page 3-310“Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) but just how would common insect loss impact food chain and life cycle for animals dependent upon them? It appears to me that a basic analysis of common species has not been done, I did not see yearly population estimates of the resident or common migratory insects, the average reproduction of the species, and how that may be altered, the death of common species both during construction and ongoing through collision, applied chemicals, habitat loss, or the reverse impact if the natural predator is impacted, killed, or driven out of the area by human activity or ongoing turbine noise. I didn’t see analysis on how insects and their larvae are used as a food source, or what feeders maybe impacted by a sudden or lasting disruptions of insect lifecycle. I can appreciate there was a limited survey of St. Anthony Sand Dune Tiger Beetle, but there are so many other insects that don’t seem to have been included. There could be catastrophic impacts on agriculture if those creatures that feed on crops are protected from their natural enemies by construction or functioning turbine activity. Beetles assist in decomposition, provide healthy soil by breaking down organic matter, break down waste, break down decaying wood into the soil, feed on dead plants & animals, and beetles seek out and feed on pests in the soil. Many ground beetle species have broad feeding habits, eating other insects and seeds of plants (including weeds). Beetles serve as food for many species, especially in the larval stage. The internet is awash in US Government webpages that identify the value of common beetles. Wind Turbines in Europe have become overwintering zones for invasive species. Turbines protect rodents and insects from being consumed by birds, and bats, and may deter ground predation as well. Heat produced by turbines attracts species of insects to overwinter which may prevent natural migration or winter kills that our area depends upon to balance certain species. Without in-depth study of the impact of 400 turbines in the Lava Ridge area, it would be reckless to move forward with any of the proposed options, except option A, to do nothing. No to turbines on Lava Ridge Insect fatalities at wind turbines as biodiversity sinks January 2021Conservation Science and Practice 3(5) DOI:10.1111/csp2.366 LicenseCC BY 4.0 Authors: Christian C Voigt Leibniz Institute for Zoo and Wildlife Research, Alfred-Kowalke-StraBe 17, 10315 Berlin, Germany. “Evidence is accumulating that insects are frequently killed by operating wind turbines, yet it is poorly understood if these fatalities cause population declines and changes in assemblage structures on various spatial scales… Recently, the annual loss of insect biomass at wind turbines was estimated for Germany to amount 1,200 t for the plant growth period, which equates to about 1.2 trillion killed insects per year, assuming 1 mg insect body mass… We need to understand (a) how attraction of insects to wind turbines affect fatality rates and interactions of insect predators with wind turbines. (b) We have to connect insect fatalities at wind turbines with source populations and evaluate if these fatalities add to the decline of insect populations and potentially the extinction of species. (c) We need to assess how fatalities at wind turbines change insect-mediated ecosystem services” https://www.researchgate.net/publication/348790564_Insect_fatalities_at_wind_turbines_as_biodiversity_sinks ResearchGate Wind Turbines as Overwintering Sites Attractive to an Invasive Lady Beetle, Harmonia axyridis Pallas (Coleoptera: Coccinellidae) October 2015The Coleopterists Bulletin DOI:10.1649/0010-065X-69.4.665 “One of the most invasive species of insects in Europe is the Asian lady beetle, Harmonia axyridis (Pallas, 1773). This species is often observed in anthropogenic areas, especially during autumn and winter when the adults enter buildings and start the overwintering process in large aggregations. On wind farms in intensively used farmland in Poland, H. axyridis uses wind turbines as overwintering sites. We hypothesize that H. axyridis adults are attracted to wind turbines for heat and protection from the wind.” https://www.researchgate.net/publication/281459499_Wind_Turbines_as_Overwintering_Sites_Attractive_to_an_Invasive_Lady_Beetle_Harmonia_axyridis_Pallas_Coleoptera_Coccinellidae For a list of beetles, see Idaho Official Government Website for Idaho Species, beetle. https://idfg.idaho.gov/species/taxa/explore?name=beetle&category=All&idapa=All Lava Ridge DEIS V 1. 3.11.1.1 Affected Environment “Most pollinators in this region are insects (e.g., bees, wasps, flies, beetles, butterflies, and moths), but hummingbirds also pollinate. More than 400 species of pollinators occur in the state of Idaho (Idaho State Department of Agriculture 2016). Bees (Hymenoptera) are the most well-studied and important pollinating insect, though flies (Diptera) also provide substantial pollination services (Larson et al. 2001; Ssymank et al. 2011). Other insects such as beetles (Coleoptera) and wasps (Hymenoptera) provide pollination services, though to a lesser extent (Kevan 1999). Butterflies and moths (Lepidoptera) have been documented pollinating wild plant species, including some flowering plants specially adapted for butterfly pollination (Fallon et al. 2014). At least 24 genera of native bees, 22 genera of butterflies, 24 genera of wasps, and six genera of moths occur in Idaho, some of which have been studied and are known”… In Volume 1 page 3-300 you do reference various insects, with a focus on pollinators, but seem to skip the totality of on-going insect death and its impact upon the foliage, aeration, food source for mammals, reptiles, amphibians, other insects, and birds. You admit the lack of data even for pollinators and that species are already in decline, those species that the project will knowingly impact. “Wild pollinators, such as the monarch butterfly (Danaus plexippus) (see Section 3.11.3 [Monarch Butterfly]) and a number of bumble bee species (see Section 3.11.4 [BLM Special-Status Bumble Bees]), are in decline (Idaho State Department of Agriculture 2016). Pollinator declines are attributed to the loss, degradation, and fragmentation of habitat (Kremen et al. 2002; Potts et al. 2010); introduced species (Memmott and Wasser 2002); the use of pesticides (Pisa et al. 2014); habitat disruption from grazing, mowing, and fire (Hatfield and LeBuhn 2007; Johst et al. 2006; Potts et al. 2005); and diseases and parasites (Altizer and Oberhauser 1999; Cameron et al. 2011; Colla et al. 2006; Davis and de Roode 2018). Data on local native pollinator populations are lacking.” 3.11.1.3 page 3-310 “Irreversible and	rather than the severity or magnitude. As described in EIS Section 3.11.1.4 (Pollinators, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), most of the impacts to pollinators from the action alternatives (i.e., habitat alteration and loss, displacement, injury, mortality) would be irretrievable, meaning that the resource can be renewed or restored following the action. Permanent losses of resources for pollinators (i.e., irreversible impacts), would be limited to the loss or alteration of pollinator habitat where roads are left in place following decommissioning and where disturbance occurs in very fragile soils (which would be no greater than 413 acres; see Table 3.13-4 in EIS Section 3.13 [Soils]). MVE would minimize disturbance on steep slopes (where most very fragile soils are located) (see applicant-committed measures 129 and 131 in EIS Appendix 4 [Mitigation]), and very fragile soils naturally have relatively little vegetative cover to provide habitat for pollinators (see EIS Section 3.15.2.1 [Native Upland Vegetation Communities, Impacts]) the irreversible impacts to pollinator habitat in the siting corridors would be minimal. The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state, “(a) EISs shall not be encyclopedic” and “(b) EISs shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues.” In order to comply with these requirements, the BLM identified issues for detailed analysis in the EIS through the internal and public scoping processes. Specific concerns were raised regarding insect pollinators, the St. Anthony sand dune tiger beetle (a BLM special-status species), monarch butterfly (a candidate for ESA listing and BLM special-status species), and BLM special-status bumble bees; these species are addressed in EIS Section 3.11 (Pollinators and Insects). EIS Section 3.11.1.2 (Pollinators, Impacts) specifically discloses the effects of insect mortality from collision with operational turbines, including a diminishment in the ecosystem services they provide. The study by Voigt (2021) referenced in the comment is also discussed in this section. Estimates of insect fatality rates, such as those presented by Voigt (2021), inherently account for any factors that attract insects to turbines, such as those described in the Dudek et al. (2015) study referenced in the comment. As described in response to comment 11297-5 (see in Table A-3t, Pollinators and Insects), impacts to ecosystem services provided by pollinators cannot be analyzed in greater detail due to a lack of studies quantifying this effect following pollinator loss as a result of wind turbines. Dudek, K., M. Dudek, and P. Tryjanowski. 2015. Wind Turbines as Overwintering Sites Attractive to an Invasive Lady Beetle, Hramonia Axyridis Pallas (Coleoptera: Coccinellidae). Available at: https://www.researchgate.net/publication/281459499_Wind_Turbines_as_Overwintering_Sites_Attractive_to_an_Invasive_Lady_Beetle_Harmonia_axyridis_Pallas_Coleoptera_Coccinellidae. Accessed December 28, 2023. Voigt, C.C. 2021. Insect fatalities at wind turbines as biodiversity sinks. *Conservation Science and Practice*. Available at: https://www.researchgate.net/publication/348790564_Insect_fatalities_at_wind_turbines_as_biodiversity_sinks. Accessed December 29, 2023.

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		Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity All action alternatives would have irretrievable effects on pollinators through habitat alteration and loss (from work areas and infrastructure) and through displacement, injury, or mortality (vehicle strikes; collision with turbine blades; and application of herbicides or pesticides, removal of vegetation). Habitat alteration and loss effects would last up to 84 years (34 years for project construction, operation, and decommissioning plus 50 years for vegetation to reestablish after final reclamation). Displacement, injury, or mortality effects would occur during the 34-year life of the project. Additional irreversible effects would occur post-project where disturbance to fragile soils occurs (as described in Section 3.15.2 [Native Upland Vegetation Communities]) and where the BLM may choose to leave roads in place resulting in permanent habitat loss.”	
8382-3	Sue Page	In Volume 1 of EIS 3.11.1.3 Irreversible and Irretrievable Commitment and Short Term Uses Versus Long Term Productivity (see attached) 84 years of destruction 3.11 1.4 Compensatory Mitigation. NONE PROPOSED	EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) defines irreversible and irretrievable commitments, which are related to the duration of the impact rather than the severity or magnitude. As described in EIS Section 3.11.1.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), most of the impacts to pollinators from the action alternatives (i.e., habitat alteration and loss, displacement, injury, mortality) would be irretrievable, meaning that the resource can be renewed or restored following the action. Permanent losses of resources for pollinators (i.e., irreversible impacts) would be limited to the loss or alteration of pollinator habitat where roads are left in place following decommissioning and where disturbance occurs in very fragile soils (which would be no greater than 413 acres; see Table 3.13-4 in EIS Section 3.13 [Soils]). MVE would minimize disturbance on steep slopes (where most very fragile soils are located) (see applicant-committed measures 129 and 131 in EIS Appendix 4 [Mitigation]), and very fragile soils naturally have relatively little vegetative cover to provide habitat for pollinators (see EIS Section 3.15.1.2 [Native Upland Vegetation Communities, Impacts]) the irreversible impacts to pollinator habitat in the siting corridors would be minimal. Therefore, compensatory mitigation for pollinators is not warranted.

Recreation

Table A-3u. Recreation

Comment ID	Commenter	Public Comment	Response to Comment
10419-1	Sandra Mitchell	Wind Energy is a rapidly growing form of renewable energy and it is of no surprise that there is great potential in Idaho. However, developing this project should not mean that recreation should be negatively impacted. The choice does not have to be 'one or the other'. Recreation is important to not only to the quality of life of Idahoans and their visitors but to the economic stability of many communities. To ensure that good decisions are made concerning recreation, please work with the local clubs and users to make sure that all roads and trails are included on your maps. Complete information needs to be available so folks can make informed decisions.	See response to comment 11527-10 (see in Table A-3u, Recreation) (see in Table A-3u, Recreation).
10529-1	John Hurley	The topic should address security and continued public access. I am afraid, in the future, a decision will be made to restrict public access in the vicinity of the wind towers. While visiting public lands, I see a lot of vandalisim and shooting damage to infrastructure and signage. Everything eventually gets shot up or torn up. Wind towers will not be immune from the problem. Multi-million dollar turbine blades will be rotating with bullet holes or damage to other components will be expensive to repair and maintain. Because this is a Presidential priority to deploy the project, it may come to the conclusion to restrict public access for National security. The wind tower company may petition the government to restict access. The area will need security cameras and special patrols by personnel including BLM employees. This will lead to animosity towards government and companies for spying on citizens. [...] Please give this topic your attention and understand the ramifications of limiting access to public lands.	See responses to comments 7320-3 (see in Table A-3u, Recreation) and 12934-5 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).
11327-16	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	We ask that the BLM also include any relevant data from IDFG on upland bird hunting in the project area. IDFG’s Zone 4B currently has 120 sage-grouse tags available for a season running from September 17-October 31. There are also additional wing-shooting and upland game opportunities available in the project area- we ask that if IDFG data is available for these to include them in the project analysis.	Harvest statistics are not available for upland game birds on IDFG’s website, which is why the EIS only presents statistics for elk, deer, and pronghorn (see Table 3.12-2 in Section 3.12.1.1 [Affected Environment]).
11327-17	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	It is clear that, if any action alternative is selected in their current form, the hunting experience within the project area will be substantially altered. New road construction would increase the mileage of existing roads in the siting corridors by 121%, which will increase access to game species and negatively impact game populations in the long term. Increased human activity and motorized access will disturb big game species present in the project area and will likely cause wildlife to avoid siting corridors. This disturbance may push big game animals onto neighboring private lands, which further reduces opportunities for public land hunters. A loss in functional habitat for ungulates on BLM-managed land will cause avoidance conflicts with private landowners and agricultural producers. As is, GMU 53 cannot support many deer without unacceptable conflicts with agriculture, with depredation complaints already common.54 IDFG has documented more than 3,000 mule deer moving into GMU 53 during the harsh winter of 1985-1986, resulting in 54 depredation complaints. The Department has also	See response to comment 6009-1 (see in Table A-3u, Recreation).

Comment ID	Commenter	Public Comment	Response to Comment
		documented a substantial number of deer-vehicle collisions when mule deer move down into GMU 53 to escape harsh winters. As discussed in the DEIS, big game are likely to continue to avoid areas with ground disturbance until reclamation success is achieved, or 50 years beyond decommissioning. We believe the sheer size of the proposed project, as well as all of the action alternatives, will forever change hunting in the region by displacing wildlife off public land onto private lands, increasing depredation claims and management actions required to respond to depredation complaints, and fragmenting what is left of intact habitat currently utilized by ungulates. We do not believe sportsmen and women of Idaho will accept these generational impacts to the public land hunting opportunities that currently exist. These impacts may be reduced through a smaller project footprint and smarter corridor siting, but they are likely to persist even with these modifications.	
11491-17	Dean Dimond, Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: [...] 9. New information regarding security, effects of fencing and large structures on human and wildlife access to federal lands, [...] 12.Need new information on project scale effects on other aspects of human use of public lands in addition to grazing [...]	See response to comment 7320-3 (see in Table A-3u, Recreation).
11508-8	Justin Gott, Daniel Gott, Josie Gott	I believe that BLM needs to manage this area for the best public interest. Building the LavaRidge Wind Project is not in the publics best interest because the public will no longer be able to access this area.	As stated in EIS Section 1.2 (Purpose and Need), the need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V). Also see response to comment 7320-3 (see in Table A-3u, Recreation).
11527-10	Richard Stover; State of Idaho	The State of Idaho requested that the BLM perform a detailed off-highway vehicle (OHV) route inventory in the Project area in September of 2021. The DEIS summarizes proposed publicly available road mileage. However, this information does not address the need for an OHV inventory. In section 3.12.3.1, Affected Environment, the BLM defines OHV routes to include “roads or trails that are designated by the BLM as open or limited to OHV travel” in the entire Shoshone Field Office (p. 3-346). However, there is no known Travel Management Plan (TMP) for motorized access for the Project area, and no publicly facing BLM ground transportation linear features for Public Routes/Roads/Trails data that depicts inventoried OHV trail in the Project area. The BLM characterizes inventoried roads in the Project area as “OHV routes” or “OHV access” without specifically inventorying such routes for OHV trail character. While area roads may be OHV-legal (irrespective of TMP status), this does not equate to trail access. The BLM must not characterize road access as being the same OHV trail riding opportunity. The DEIS inadequately mentions trail-based OHV recreation and access in the Recreation section only referring to “OHV use” or “motorized access” presumably as analogs of OHV recreation (p. 3-333). Content in that section covering “driving for pleasure” refers to DEIS Appendix 3 (Issues Analyzed in Brief) Issue AIB-25. Appendix 3 refers back to the recreation section. These circular references do not contain an analysis of OHV opportunity. The omission of a thorough inventory and analysis of “OHV routes,” including defining trail characteristics where they exist, does not allow the public to evaluate the impact of the Project on OHV trail recreation opportunities. It is not possible to determine whether such opportunities exist in the area, nor whether there is potential to use this DEIS as a resource to propose and develop valued recreational opportunities. Recommendations for FEIS and ROD The FEIS must include an OHV route inventory throughout the Project area to define trail characteristics and determine OHV trail recreation opportunities.	Section 3.12.2 (Off-Highway Vehicle Opportunities and Experience) has been revised to clarify what kind of OHV data is currently available for the SFO planning area and that a detailed OHV inventory and TMP is not available at this time. Development of a TMP with a detailed OHV inventory constitutes a land use planning action that falls outside the scope of this NEPA analysis. Although trail character data is lacking, the BLM reasonably assumed that the recreational setting characteristics (RSCs) of OHV routes in the analysis area range from primitive to rural based on what is known about the overall landscape setting and character. The BLM also reviewed OHV route data that was provided by local clubs and compared it against datasets used in the EIS analysis to ensure that all existing routes were accounted for. AIB-25 analyses potential effects to dispersed recreational opportunities, such as driving for pleasure, in terms of changes to public access and changes to the landscape character and attractiveness of the area for recreational users. AIB-25 only refers back to the recreation analysis in Section 3.12 (Recreation) to inform readers that more specific analyses related to hunting and OHV can be found in that section.
11535-67	Steven Andersen	Because the development of this project will involve the cutting of new roads into previously inaccessible areas, public use of these areas will increase substantially. This increase in use is likely to result in increased fire danger, the spread of invasive species, vandalism, and disruption of habitat in remote, currently unaltered natural resource areas. Increased access leads to increased foot traffic from hikers fording streams, OHVs crossing streams or driving along stream beds, and increased fishing activities, which could result in impacts to shoreline and shallow water vegetation, increased erosion from shoreline areas disturbed by foot and vehicle traffic, disruption of stream bottoms that support invertebrate and fish populations, and increased fishing pressure.216 The DEIS fails to address how new roads and structures will alter previously unaltered and undisturbed natural lands.217 Nor does the DEIS address the extent to which the project will designate areas that must remain unaltered. In fact, the Project Development Manager confirmed that they have no firm plan for the location of the turbines and therefore, no firm plan on the location of the roads.218 Without this, the DEIS cannot possibly make an informed analysis of the impacts to the land.	The potential effects of increased public access and human activity on some of the natural resources mentioned by the commenter are addressed in EIS Appendix 3 (Issues Analyzed in Brief) related to looting and vandalism (AIB-23), wildlife (AIB-54, AIB-57, and AIB-61), and avian and bat species (AIB-2, AIB-3, and AIB-7). As stated in AIB-54, although improved public access may facilitate increased public use of the project area, there is also the potential for the project to deter some people from using the project area, particularly recreational users who prefer more remote and undeveloped settings.
11535-71	Steven Andersen	The DEIS also fails to adequately estimate illegal hunting in the area as a result of the access results. Moreover, it asserts that an increase of roads and access by up to 121% is unlikely to lead to changes in overall take of big game species without providing any reasoning behind why it is unlikely.	AIB-54 (EIS Appendix 3 [Issues Analyzed in Brief]) has been revised to include additional discussion of how project-related effects on hunting access and opportunities would affect big game populations, and the BLM’s rationale for determining those effects.
11535-120	Steven Andersen	The DEIS does not address the project’s impact to recreation on a cultural or economic level. Fishing, hunting, and wildlife viewing are long-standing traditions in Idaho. In 2016, BLM land in Idaho alone saw 466,100 fishermen, 296,500 hunters, and 193,500 wildlife watchers.355 The total expenditures related to these economic activities in 2016 were $295 million, supporting 2,559 jobs and $85 million in salaries and wages.356 Recreational use on BLM land also generated $33 million in federal, state, and local taxes (Pew Fact Sheet, 2018).357 About 5% of Idahoans participate in hunting; big game hunting is the most popular type of hunting in the state (USFWS, 2016). 358 On average, nearly 65,000 deer tags and 35,000 elk hunting tags are issued in wildlife management units in southern Idaho annually (Idaho Department of Fish and Game, 2021).359 The reduction in recreational activities necessarily involves a drastic decrease in state revenue and affects hundreds of thousands of individuals.	See responses to comments 11620-10 (see in Table A-3h, Environmental Justice and Socioeconomics) and 6009-1 (see in Table A-3u, Recreation).

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11535-121	Steven Andersen	The DEIS does not adequately address this project's potential introduction of invasive species and its effect on recreation. Eiswerth et al. (2005) used economic data in combination with the national recreational survey to estimate the impacts of invasive plants on outdoor recreation in western states.360 They found that the total economic loss resulting from invasive species spread was estimated to be between $5.9 and $12.4 million per year.361 Moreover, out-of-state recreational expenditures were estimated to be reduced by $4.47 and $17 million depending on the annual rate of infestation.	As stated in AIB-57 (EIS Appendix 3 [Issues Analyzed in Brief]), MVE would implement various measures to reduce the likelihood of introduction and spread of nonnative species. This includes controlling weeds and nonnative invasive plants that result from construction, use, or maintenance authorized in their ROW grant. AIB-57 concludes that with these measures in place, the potential for the project to introduce or spread weeds and invasive plants would be low and the potential of these species to degrade wildlife habitats would also be low. Based on this analysis, invasive species introductions are not expected to cause noticeable changes to the recreation economy. Also see response to comment 11620-10 (see in Table A-3h, Environmental Justice and Socioeconomics).
11535-122	Steven Andersen	The aforementioned problems with respect to wildlife and big game are repeated in this section. Wind turbines can affect the local deer population by displacing them from their natural habitat. If the turbines are located in an area deer typically inhabit—which is the case here—they may avoid it altogether. This could lead to a decrease in the overall number of deer in the area, which could ultimately impact hunting success.363 Moreso, when the construction is complete, noise generated by the wind turbines can scare deer away, robbing generational hunters of their accustomed hunting locations. Additionally, once the wind turbines are operational, they may impact wind patterns and speed which may also have an impact on hunting. Understanding the direction the wind is blowing is crucial in deer hunting. Deer have a keen sense of smell and can smell people from at least 300 yards away. Hunters are advised to stay downwind to avoid deer smelling them. Wind turbines decrease the speed of the wind and increase turbulence by creating an atmospheric flow. They also decrease the speed of the wind, affecting deer hunting. The DEIS makes no mention of the connection between this project's tendency to decrease big game in the area and its effect on hunting. Rather, it focuses on the project's effects during the two-year construction period.	See response to comment 6009-1 (see in Table A-3u, Recreation).
11535-123	Steven Andersen	With respect to bird hunting, the DEIS states "[h]abitat loss and alteration from project development in wildlife tracts could affect the populations of upland game birds and other game species for which they are managed."364 As noted above, the operation of wind turbines will have an enormous impact on birds—bird game being no exception. For example, breeding pairs of ducks "may abandon otherwise suitable wetland habitat, display behavioral avoidance thereby reducing densities of pairs using wetlands near wind turbines, and experience mortality from collision with turbines and associated infrastructure."365 "Additionally, indirect effects on breeding ducks potentially include avoidance of associated grassland by nesting females, increased predation, or reduced reproduction."366 The DEIS does not account for these or similar effects of all bird game species.	Potential effects of the project on avian populations and their habitats are analyzed in EIS Section 3.3.2 (Avian Populations) and AIB-1 through AIB-5 in EIS Appendix 3 (Issues Analyzed in Brief). These analyses address potential direct and indirect effects to avian habitat, avian populations, and avian migration patterns resulting from collisions with turbines or vehicles, habitat loss, electrocution with power lines, and increased human activity and noise. Section 3.12.1 (Hunting and Trapping Access and Opportunities) has been revised to cross reference these sections when discussing potential effects to upland game bird populations and associated hunting opportunities.
11535-124	Steven Andersen	The DEIS claims that "temporary restrictions" would be implemented on land often used by Off-Highway Vehicle ("OHV") users. Yet, it does not disclose the duration or extent of these restrictions, seemingly leaving the decision to the discretion of MVE.	The duration of temporary access restrictions during construction and decommissioning are described in Table 3.12-1. Additional details are provided in Section 1.3.17 of MVE (2023). As stated in Table 3.12-1, during the 2-year construction and 2-year decommissioning periods, public access to siting corridors may be restricted for public safety. Although MVE (2023) states that the duration of public access restrictions in the siting corridors would be minimized wherever possible (e.g., on access roads), those details cannot be known at this time. Therefore, the recreation analysis assumes there would be temporary public access restrictions throughout the siting corridors for the 2-year construction period.
11535-125	Steven Andersen	Moreover, the consequences from dust plumes will have negative consequences on area recreation. As discussed herein, the water necessary for dust abatement is vastly underestimated, and planned control measures are inadequate.	Sections 3.12.2 (Off-Highway Vehicle Opportunities and Experience) and AIB-25 (EIS Appendix 3 [Issues Analyzed in Brief]) analyze potential effects to recreational uses, and both of these sections mentioned how air quality effects (e.g., dust) could contribute to an altered landscape setting and experience for recreational users. Also see response to comment 11488-1 (see Table A-3a, Air Quality).
11554-16	Raul Labrador; Idaho Attorney General's Office	Thus, the draft EIS concludes that hunting opportunities" will be significantly "diminished" due to the Project's "population-level" effects on mule deer and pronghorn. DEIS at EX-xxi; id. at 3-479–480. These "population-level effects" would be "irreversible," DEIS at 3-486, and would extend far beyond BLM land. Such effects will particularly burden tribal reserved rights in ways that will likely overtax Idaho lands and resources. Diminished wildlife habitats and tribal hunting grounds necessarily impact Idaho's right to manage its wildlife resources.	See response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics).
11620-7	Simone Griffin; BlueRibbon Coalition	Public land is commonly used to access trails for recreation purposes. Off-roading is popular and any project proposal needs to account for the effects to the recreation and motorized use community. A thorough inventory of all current trails needs to be completed so that the BLM is working with an accurate baseline. These area have a high recreation value for locals in the surrounding communities and any project proposed should be developed in a way that does not restrict access to users.	See response to comment 11527-10 (see in Table A-3u, Recreation).
11620-9	Simone Griffin; BlueRibbon Coalition	BRC believes that all users can and should be accommodated. This plan should ultimately identify reasonable standards for allowing dispersed camping. According to The Dyrt, a camping app, camping has grown immensely since 2019. Public lands are needing more camping facilities than ever before as almost 50% of campers are new campers. The number of people who use public land to camp is only growing every year. The BLM needs to strongly consider providing as many camping areas as possible as to not concentrate use in limited sites. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. Better facilities to address waste issues need to be created before any restrictions. BRC supports all recreational activities if done responsibly.	See response to comment F2-9 (see in Table A-3u, Recreation).

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11869-18	Raul Labrador, Josh Turner; Idaho Attorney General's Office	The Magic Valley region holds some of Idaho's best hunting land for big game, upland bird species, small game, and waterfowl.1 The Project will devastate wild game and other animals in the area. The draft EIS recognizes this fact but gives it no weight.	See response to comment 6009-1 (see in Table A-3u, Recreation).
11873-20	Mary Schwartz, Frank Schwartz	22. In the event the BLM chooses to move forward with this wind farm project, the road system network should be utilized by BLM as recreational motorized and nonmotorized routes during operations and should be retained for that purpose following the conclusion and decommissioning of the project. Table ES-2, Recreation, states that there will be new off highway vehicle use access and opportunities in siting corridors over the long term, however this use was not analyzed in the DEIS, so is misleading and is essentially a blind promise. If it is real, BLM should provide this commitment to recreation in writing as part of the windfarm decision. Regardless of the final decision, MVE should be required to place cattle guards (and bypasses) at every fence crossing to hopefully reduce the problem with people not leaving gates as they are found.	As described in Section 3.12.2 (Off-Highway Vehicle Opportunities and Experience), the addition of up to 486 miles of new access roads and the improvement of up to 147 miles of existing roads, which would be open to OHV users, would create new OHV access and opportunities in the siting corridors during project operation. As described in the Decommissioning Plan (Appendix L in MVE [2023]), access roads would either be removed or left in place during decommissioning, based on the preference of individual landowners or land management agencies. Section 3.12.2 has been revised to clarify that some access roads may be left in place for continued use by OHV and other recreational users, if the BLM determines this to be preferred in light of all resource and environmental considerations.
12236-2	David Bjerke	As you are no doubt aware, much of the land impacted by this project is currently used by many, many Idahoans for a variety of recreational purposes, including hiking and hunting. These recreational pursuits are a huge part of what makes Idaho unique among the states -- wild, open spaces where a person can go for enjoyment and renewal. The wind project would completely eliminate those recreational pursuits and change the character of Idaho substantially and negatively. The enormity of the project alone (200,000 acres of public land, up to 400 wind turbines, 486 miles of new roads, and over 200 miles of high-voltage, overhead collection and transmission lines) would completely destroy any recreational use.	See response to comment 7320-3 (see in Table A-3u, Recreation).
12968-12	Charles Brockway	Similarly, the impact on recreation activities in the project footprint would be monumental. The enjoyment of recreational activities in this area relies to a large degree on the remoteness and serenity of the area. The wind turbines would decimate - and in many areas completely destroy - the quality of recreation. Hunting activities would also be decimated. Alteration of seasonal habitat, the constant presence of sonic and subsonic noise, and the increased presence of human activity, will very likely result in a major reduction of game.	See response to comment 6009-1 (see in Table A-3u, Recreation).
13006-24	Leon Smith	1) Recommend BLM include additional analysis of long term direct and indirect, spatial impacts to recreation, based on the impacts to wildlife/avian/pollinators, and recreation distribution/displacement.	Given the lack of formally designated recreation sites (i.e., designated trails or campsites), the relatively homogenous distribution of OHV routes and habitat types throughout the siting corridors, and the fact that big game ranges encompass the majority of the siting corridors, the spatial distribution of recreational effects are assumed to be relatively uniform across the siting corridors.
13006-25	Leon Smith	2) Recommend BLM include recreation user map of ORV routes in the area.	See response to comment 11527-10 (see in Table A-3u, Recreation).
13006-26	Leon Smith	3) Recommend BLM incorporate relevant IDFG data for additional analysis of upland bird hunting experience.	See response to comment 11327-16 (see in Table A-3u, Recreation).
13006-27	Leon Smith	4) Recommend the DEIS clearly recognizes the State constitutional right to hunt, fish and trap on public lands, but that access may be temporarily restricted for safety purposes in places during construction.	The Proposed Action would have no effect on state hunting regulations. As stated in EIS Section 3.12.1 (Hunting and Trapping Access and Opportunities), public lands in the siting corridors would be open to hunting and trapping access for the public, with the exception of fenced restricted areas. The Proposed Action and alternatives are in conformance with applicable land use plans (see EIS Appendix 2). In addition, EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies) demonstrates how the project would be consistent with applicable federal, state, and local statutes, regulations, and permit requirements. Responsibility for compliance during the construction, operations and maintenance, and eventual decommissioning of the project would rest with MVE.
1751-2	Tom Lajoie	Visual resource management also needs to be highly considered through this NEPA process according to FLPMA. Dispersed camping is a popular recreational activity that also needs to be protected through these plans	See response to comment F2-9 (see in Table A-3u, Recreation).
2927-1	Carol McNeil	AIB-25 states there are no designated recreation sites such as hiking trails or campgrounds. Please draw your attention to the attached map. The shaded areas are the MVE project. It also shows the interrogated trail system that has been developed over many years. This trail system keeps natural balance and harmony with the natural beauty of this high desert vista. All the recreational opportunities listed can enjoy this trail system. Please clarify how this could ever really be replaced. To reclaim this area and the wildlife would take well over the 34 years, more like 80 plus years. It still would not be what we have today. Alternative A, no action makes the best choice. Current generations and future generations of Magic Valley residents deserve to have this area kept in this natural state.	AIB-25 has been revised to clarify that motorized roads and OHV trails do occur within the siting corridors, and recreational uses associated with these facilities are addressed in EIS Section 3.12.2 (Off-Highway Vehicle Opportunities and Experience). Although designated campsites or hiking trails do not occur within the siting corridors, potential effects to dispersed recreational activities such as dispersed camping and hiking are analyzed in AIB-25.
3245-2	Aaron Larsp	AIB-25 states there are no designated recreation sites such as hiking trails and campgrounds. Please check out Google Earth for this area. It does show trails in this area. As far as campgrounds go, we do mostly dry camping with no benefit of campgrounds. Camping does not need campgrounds.	See response to comment 2927-1 (see in Table A-3u, Recreation).
6009-1	Douglas Miller	Hunting is a core cultural element - even a way of life in - Idaho. Any curtailment, restriction, or degradation of hunting opportunity and quality on public land that results from energy development is unacceptable. As noted in the draft EIS, each of the build alternatives will adversely impact hunting in multiple ways, including loss of public access to lands that have hunting values. Loss of existing access to public land is a key reason why hunter numbers are declining and the concomitant loss of conservation funding (see, for example: https://www.npr.org/2018/03/20/593001800/decline-in-hunters-threatens-how-u-s-pays-for-conservation <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.npr.org%2F2018%2F03%2F20%2F593001800%2Fdecline-in-hunters-threatens-how-u-s-pays-for-	EIS Section 3.12.1 (Hunting and Trapping Access and Opportunities) analyzes the potential effects of the project on hunting access and opportunities. This analysis discusses factors that would influence hunter participation such as accessibility via motorized roads, changes in the recreational quality of the area, and changes to big game populations. As described in this section, the project would increase the mileage of existing roads in the siting corridors, which would improve hunter access during operation. At the same time, big game avoidance of the siting corridors would have the potential to reduce hunting opportunities in the immediate project vicinity and increased ambient noise levels and visual changes to the landscape may cause some hunters to avoid the area during the life of the project. Therefore, the project would have both beneficial and adverse effects on hunting

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		conservation&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cd72aa2c31eb0408f6e8008db24afa1da%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638144108974090882%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=EY2AiC1hT2g5OVzldLyAFN9ZLvntIn2%2FVPxfl6IzVw8%3D&reserved=0>) and cultural identity. The draft EIS does not provide an quantitative analysis of how each build alternative will impact hunter participation and the loss of funding for wildlife conservation programs. And, importantly, the draft EIS does not present an analysis of the impact of various alternatives on hunting season lengths, bag limits, number and availability of big game tags, hunting methods, and the like. Accordingly, only Alternative A can be judged acceptable. Further, the draft EIS is silent on the various alternatives' impacts on poaching. More roads commonly lead to an increase in poaching (see, for example: Jackson, S.D. 2000. Overview of Transportation Impacts on Wildlife Movement and Populations. Pp. 7-20 In Messmer, T.A. and B. West, (eds) Wildlife and Highways: Seeking Solutions to an Ecological and Socio-economic Dilemma. The Wildlife Society). All but Alternative A will require hundreds of miles of new roads. The draft EIS must therefore be revised to include a detailed analysis of the likely and probable impact of each alternative on poaching before a credible and comprehensive analysis and decision for the project can be made. In the absence of such a revision, the project application must be rejected on the presumption that increased road length and density will result in unacceptable and unmitigatable increases in poaching.	access and opportunities. Aside from qualitatively describing these countervailing effects on hunting access and opportunities, the BLM cannot quantify with any certainty what the net effect of the project would be on hunter participation rates. The BLM analyzed potential effects of the project on big game populations in Section 3.18.2 (Big Game Habitats and Populations). The BLM is not responsible for managing or enforcing hunting regulations (e.g., hunting seasons, allowable methods, bag limits, permits or tags) and therefore, the BLM cannot make statements about if, or how, IDFG hunting management actions would change in the future, with or without consideration of the Proposed Action. The BLM reviewed the Jackson (2000) article provided by the commenter regarding the effects of roads on wildlife and determined that it does not contradict or add any new information that is not already discussed in the EIS (see AIB-54 in EIS Appendix 3) with respect to how improved access can lead to increased hunting and illegal take of wildlife. Also see response to comment 11535-71 (see in Table A-3u, Recreation). Jackson, S.D. 2000. Overview of Transportation Impacts on Wildlife Movement and Populations. In *Wildlife and Highways: Seeking Solutions to an Ecological and Socio-economic Dilemma*, edited by T.A. Messmer and B. West, pp. 7–20. The Wildlife Society.
6075-5	Lorinda Grant, Douglas Grant	We also recreate in the areas that will be impacted by the turbines. They say that will not lose access to the BLM ground, is this guaranteed, probably not, because security fences will be constructed around said turbines making those trails in accessible.	See response to comment 7320-3 (see in Table A-3u, Recreation).
6382-1	Laurie Bourn	I am a hunter and trapper. I trap on the edge of the lavas by my home. I used to trap in the lava rocks just north east of my home until representative Simpson declared that area part of the Craters of the Moon Monument. I can no longer take my four wheeler out there to trap because of the "no motorized vehicle" designation. Now you are proposing a huge amount of windmills that are not environmentally friendly out on the desert within close proximity of the lava beds. These turbines will affect my hunting and trapping. If I cannot take my one four wheeler out on the lavas to trap, why are these people able to tear up the area?	The BLM is not responsible for managing or enforcing hunting regulations outside of BLM lands (e.g., IDFG hunting seasons, allowable methods, bag limits, permits or tags). As stated in EIS Section 3.12.1 (Hunting and Trapping Access and Opportunities), public lands in the siting corridors would be open to hunting and trapping access for the public, with the exception of fenced restricted areas. The Proposed Action and alternatives are in conformance with applicable land use plans (see EIS Appendix 2) and the project would not include any development within Craters of the Moon National Monument and Preserve.
6837-1	Mike Miller	On page 3-201 on the BLM EIS concerning visual analysis, it states " for areas farther removed form the siting corridors 10-30 miles, the degree of visual change would not appear unaltered to the casual observer with project elements being visible but not attracting attention. " Here in Idaho we value our wide open spaces. This siting of the wind farm in this location would totally ruin this area and the surrounding area far greater than 30 miles. The wind turbines on the hills above the Hagerman Valley (Bell Rapids Wind) have totally changed that area from scenic to ugly wing mills on the hills.. The proposed Lava ridge project will have taller turbines than those at the Bell Rapids farm. Whether you are hiking, enjoying the desert, riding horseback, or on an OHV, this proposed project will rob this area of anything it is currently.	The visual analysis performed for the EIS, as summarized Section 3.16.1 (Landscape Character and Scenic Quality), used the BLM's VRI and VRM methodology and contrast rating system to determine visual contrast and impact findings. Also see response to comment 11525-3 (see in Table A-3y, Visual Resources).
7320-3	Lora Ohlensehlen	I want ordinary citizens to still have the full right to travel on that desert road to recreate. The "security" of the windmills should not restrict the public's right to be in the area. I want to be able to continue to use this area, along with all the generations of my family, and ordinary citizens.	As stated in EIS Section 3.12.1 (Hunting and Trapping Access and Opportunities), public access to the siting corridors would be temporarily restricted during construction and decommissioning to protect public safety. MVE's applicant-committed measures 41 and 42 would be implemented during construction and would reduce the duration of public access restrictions to the extent practicable, while also ensuring public safety (see Table App4-2e in EIS Appendix 4 [Mitigation]). During the approximately 30-year operation period, public lands in the siting corridors would be open to the public, with the exception of fenced restricted areas such as the operation and maintenance facilities and substations. Up to approximately 2,219 acres of public lands would no longer be available for public use during operation of the project due to the footprint of infrastructure. However, up to approximately 486 miles of new access roads and 147 miles of improved access roads would be open to the public, which would facilitate improved public access in the area. Therefore, the project would not preclude recreational uses from continuing but would reduce the acreage available in the siting corridors and would modify the landscape setting of the area for recreational users.
7334-1	Terry Ruby	Secondly, my concern is about all the roadways that are proposed to be build in this area. My question to the power company is: How do you plan to protect your investment on these public lands? Just South of this area you have a population that is very outdoors oriented. These people are just looking for an area such as this with roadways they can run their ATV's, UTV's and whatever motorized vehicle they have. The outcry of these people in the event that this area is closed to them will be very loud and with lawyers involved and so on.	See response to comment 7320-3 (see in Table A-3u, Recreation).
F2-2		I am concerned the proposed wind project, if approved, will restrict access to users such as myself in this area. Public land should benefit as many users as possible and not just benefit a few corporations. Visitation on public lands have grown immensely over the past few years. The BLM should be looking at ways to provide access that will sustain the growing numbers of visitation, this project will decrease access.	See response to comment 7320-3 (see in Table A-3u, Recreation).
F2-8		In April of 2022 the Department of Interior released its Equity Action Plan which addresses the lack of access on public lands. In order to advance equity of access on public land for those with mobility impairment disabilities, it is important to recognize that discrimination towards Americans with disabilities within federal land management agencies is deeply rooted and hidden in plain sight. Motorized recreation is often the only way those with mobility impairment disabilities are able to access public lands. BLM should ensure that the plan complies with the Department of Interior's Equity Action Plan, which recognizes that restrictions on motorized access to public land create barriers of access to those with disabilities.	As described in Section 3.12.1 (Hunting and Trapping Access and Opportunities) and AIB-25, the project would increase the mileage of existing roads in the siting corridors, which would improve motorized access to public lands during operation. Temporary access restrictions would be implemented during construction and decommissioning to protect public safety. MVE's applicant-committed measures 41 and 42 would be implemented during construction and would reduce the duration of public access restrictions to the extent practicable, while also ensuring public safety (see Table App4-2e in EIS Appendix 4 [Mitigation]). Also see response to comment 7320-3 (see in Table A-3u, Recreation).

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F2-9		Dispersed camping is a popular recreational activity that also needs to be protected through these plans. Any user conflicts or possible resource damage can be solved through management solutions other than closure and the BLM needs to implement these practices first.	Potential effects to dispersed recreational activities, including but not limited to dispersed camping, are analyzed in AIB-25 of EIS Appendix 3 (Issues Analyzed in Brief). AIB-25 has been revised to provide additional discussion and clarification on project-related effects to dispersed recreational opportunities during construction, operation, and decommissioning.

Soils

Table A-3v. Soils

Comment ID	Commenter	Public Comment	Response to Comment
10426-3	Casey Stevenson	[These are my concerns which have not been addressed by the EIS which will impact thousands of people, and need to be reevaluated. Here are my concerns:] The installation of wind turbines requires the construction of access roads, foundations, and transmission lines. These activities can lead to soil compaction, erosion, loss of top soil and alteration of the surface hydrology, which can affect the recharge of the aquifer. Additionally, the heavy equipment used during the construction of wind turbines can damage the soil structure and reduce soil porosity, which can affect soil aeration and water infiltration. This can negatively impact soil health by reducing the nutrient-holding capacity of the soil and reducing microbial activity. The operation of wind turbines can also lead to soil erosion as the spinning blades can create turbulence, which can lead to increased soil erosion and sedimentation. Furthermore, the use of herbicides to control vegetation around wind turbines can also have negative effects on soil health by reducing soil biodiversity and microbial activity, which are essential for maintaining soil health.	Compaction was added to soil impacts from ground disturbance. See EIS Section 3.13.1.2 (Soils, Impacts) for a discussion of the potential impacts to soils, including soil compaction, erosion, and topsoil loss, as well as the measures that would be implemented to minimize or avoid these impacts. Impacts related to soil compaction (including reduced porosity and decreased soil health) are accounted for in the summary of impacts to soils presented in EIS Table 3.13-4. Potential impacts to surface hydrology and the measures that would be implemented to minimize or avoid these impacts are described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) (see AIB-47). A complete list of avoidance and minimization measures is provided in EIS Appendix 4 (Mitigation). As described in EIS Section 3.17.1.1 (Groundwater Quantity, Affected Environment), the ESPA covers an area of approximately 10,800 square miles and recharging groundwater recharge in the ESPA "occurs via multiple resources including annual precipitation and tributary basin underflow. Irrigation water infiltration provides the largest source of aquifer recharge, resulting in approximately 60% of total recharge to the ESPA (USNRC 2006)." None of the alternatives would impact tributary basin underflow or irrigation water infiltration, and the greatest amount of ground disturbance under any action alternative would be approximately 9,114 acres (14.24 square miles) or 0.1% of the ESPA. Additionally, most impacts related to soil compaction would be short-term since interim reclamation would be implemented in work areas following disturbance, which would include measures to decompact soils, as described in the Reclamation Plan (Appendix E in MVE [2023]). Therefore, it is unlikely that any of the action alternatives would have a measurable impact on recharge of the ESPA. The BLM is unaware of any peer-reviewed literature documenting soil erosion due to turbulence from operational wind turbines. App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) describes the potential impacts to wildlife from herbicide use (see AIB-57) and has been updated to include impacts to soils and vegetation. As described in this table, MVE would be required to use BLM-approved herbicides and obtain written approval from BLM for all herbicide application plans. Effects from the use of BLM-approved herbicides are disclosed in in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) and are not repeated in this EIS; all herbicide applications would adhere to the standard operating procedures identified in BLM (2007) and BLM (2016).
11223-4	Kelly Human	That area and the type of soil's there will yield an extreme dust problem with all of the travel that will be required.	See EIS Section 3.2 (Air Quality) for a discussion of fugitive dust impacts and the measures that would be implemented to minimize or avoid these impacts (see EIS Appendix 4 [Mitigation] for a complete list of mitigation measures).
11535-173	Steven Andersen	Moreover, the DEIS fails to consider that the area is already susceptible to soil erosion due to a history of wildfires, as described in the Monument RMP.	Existing and future trends and actions that have and would continue to affect soils in the analysis area, including past wildfires, are described in Section 3.13.1.1.1 (Soils, Existing and Future Trends and Actions). This section has been revised to clarify that where past wildfires have occurred soils may be more susceptible to erosion. However, as described in Section 3.7.1.1.5 (Fires and Fuels Management, Existing and Future Trends and Actions), approximately 74% of the siting corridors have been reseeded, which reduces the potential for future soil erosion in these areas. EIS Section 3.13.1.2.2 (Soils, Alternative B [Proposed Action]) describes a number of measures that would be implemented to minimize or avoid soil erosion, a complete list is provided in EIS Appendix 4 (Mitigation).
11615-2	Spencer Dixon	Microplastic pollution will be shed from the leading edge erosion of turbine. This is a well documented phenomenon but is not addressed in the EIS. This will poison our soil for 100s if not 1000s of years.	See response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11962-1	Cassie Christensen, Tyler Christensen	The BLM is responsible for management of lands, the most important component of our lands is our topsoil. Without our topsoil, even water doesn't have a purpose. The topic of destroying our top soil has not been properly addressed. In a time of carbon crisis disturbing the virgin top soil and releasing millions of years of natural Carbon storage into the atmosphere seems foolish. Potential soil carbon loss is not even discussed in the draft EIS. According to the 1American University in Washington D.C., by reducing soil disturbance, we can reduce and reverse our Carbon Exchange. Especially, when we implement the proper management of grazing of cattle, which the Bureau of Land Management was put in place to do. Proposal B will feature 400 turbines that will disrupt 197,474 acres of land (5,516 acres that will be permanently destroyed according to the draft EIS) that has been relatively undisrupted. This will be detrimental to our lands while this project is in place and the damage that is created with be everlasting. A plan should be made to restore the lands, most importantly the topsoil. Could the BLM perform a soil health analysis and also a soil carbon audit on all land being used for this project. Is it even possible for Magic Valley Energy to restore the topsoil that took millions of years to form to	See Section 3.13.1.2.2 (Soils, Alternative B [Proposed Action]) for an analysis of impacts to soils, including topsoil. As described in this section, topsoil would be salvaged and stockpiled during construction to the extent practicable and redistributed across the 6,740 acres of temporary work areas following construction; additional details are provided in the Reclamation Plan (Appendix E in MVE [2023]). Irretrievable (i.e., permanent) impacts to soils would be limited to those areas where disturbance occurs in very fragile soils, where permanent concrete footings are left in place, where soil horizon mixing occurs, and in all infrastructure areas. The BLM does not plan to do a soil health analysis or a soil carbon audit in the project area.

Comment ID	Commenter	Public Comment	Response to Comment
		current status? Could a budget be made for restoring the 486 miles of roads, 147 miles of improved roads and 197,474 acres of land to current soil health. Please consider these options our beloved grasslands are essential; they need protection and regeneration, not destruction and desertification.	
11978-131	Magic Valley Energy, LLC	33. Section 3.13.1 - Soils - Soil and Plant Growth Materials "This EIS assumes very fragile soils would have limited reclamation potential, and impacts would be permanent." "In areas where concrete foundations deeper than 3 feet below surrounding grade would remain in place, soils may be affected permanently." MVE believes the term 'permanent' is not clearly defined and suggests removing these sentences or replacing 'permanent' with terms like 'irreversible' or 'irretrievable' if applicable to the situation.	Permanent impacts are those that cannot or will not be reversed by reclamation activities following decommissioning; added here "(defined as irreversible in Section 3.1.2.4".
11978-132	Magic Valley Energy, LLC	34. Section 3.13.1 - Soils - Soil and Plant Growth Materials Use of Highly Fragile Soils versus Very Fragile Sources. A global comment to be made throughout the FEIS: Very Fragile Soils is not the proper term per the NCRS. Highly Fragile Soils is the correct term, and is used in some portions of the DEIS. MVE requests that Highly Fragile Soils is the term used and for both consistency and clarity throughout the final EIS.	The fragile soils terminology in the EIS are based on the SSURGO Fragile Soils Index Descriptions, which are provided in the metadata for the NRCS Web Soil Survey (NRCS 2020a), which was used to identify fragile soils in the siting corridors. As described in NRCS (2020a), Soils are placed into interpretive classes based on their index rating, which ranges from 0 to 1. An index rating of 1 is the most fragile, while a rating of zero is the least fragile. Interpretive classes are as follows: Not Fragile (0–0.009), Slightly Fragile, (0.010–0.209), Moderately Fragile (0.210–0.409), Highly Fragile (0.410–0.609), Very Fragile (0.610–0.809), and Extremely Fragile (0.810–1.0). "Highly fragile" has been changed to "very fragile" throughout the EIS for accuracy and consistency.
12865-3	Regina Smith	AIB-32: how would the project affect hydric soils in the siting corridors and how many acres would be affected? The DEIS pretty much admits there will be no topsoil left after they're done with the project. This could prevent vegetation recovery and reduce the quality of livestock grazing and wildlife habitat. Page 3–367 states there would be irretrievable soil impacts from permanent concrete footings that may leech minerals into the surrounding soils…. AIB-32 in volume 3, Page App3-12, again states impact context is so low that detailed analysis is not even needed. Supporting rational states " MVE would design the project to avoid wetlands and low areas, where hydric soils are present, to the extent practicable"…. Who gets to determine when things are practical, feasible, or cost-effective, as so many of their mitigation measures are provisioned? This DEIS is fraught with opinions and assumptions. These questions are far too serious to be "AIB". These questions need serious consideration.	As described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief), a number of measures would be implemented to minimize or avoid impacts to hydric soils (see AIB-33); a complete list is provided in EIS Appendix 4 (Mitigation). Since hydric soils most often occur in wetlands and riparian areas, and near waterbodies, the 100-foot no-ground-disturbance buffer that would be applied to these features (applicant-committed measure 136) would further reduce the potential for impacts to hydric soils. Where disturbance cannot be avoided, MVE would be required to prepare site-specific plans and measures to mitigate impacts (applicant-committed measure 123). While this may not completely eliminate impacts to hydric soils, the magnitude of any remaining impacts to hydric soils would be so low that additional analysis is not warranted in the EIS. The practicability or feasibility of mitigation measures described in the EIS (i.e., measures that include language such as "where practical" or "where feasible") would be determined by the BLM and MVE. The BLM has developed additional mitigation measures as needed to further minimize or avoid impacts to sensitive resources (refer to Tables App4-3, App4-4, and App4-5 in EIS Appendix 4). EIS Section 3.13.1.2 (Soils, Impacts) discusses impacts to topsoil; Table 3.13-4 summarizes the impacts to soils in the analysis area, including the amount of topsoil that would be salvaged. As described in this section, topsoil salvaged during construction would be stockpiled and spread back on disturbed areas following construction, which would help minimize topsoil loss, although topsoil loss in infrastructure areas is assumed to be permanent because it would not be feasible to stockpile topsoil salvaged from those areas over the 30-year operation period. Other irreversible and irretrievable impacts to soils, including leaching from concrete foundations and mixing of soil horizons, are disclosed in Section 3.13.1.4 (Soils, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity).
13003-2	Lynden Osborne	Having been a public land user for many years I would like to share what effect ground disturbance had on our allotments. We had four major sources of ground disturbance: small vehicle off-road users, regular vehicle traffic on established roadways, National Guard vehicles on ungrazed pastures and livestock watering areas. • Small vehicle off-road traffic was primarily motorcycles and four-wheelers. These users often followed established cattle trails but would sometimes carve out a special track if not just passing through the allotment. That track would only get bigger as the area became more popular. The wind blew topsoil away and an even deeper, wider track was created. • large vehicle traffic on established allotment roadways was similar to bike and four-wheeler traffic on tracks and on cattle trails. The dirt roads tended to tum to powder with use. The wind blew and the paths got deeper and wider. Whenever a rock outcropping was uncovered, vehicle traffic would sometimes make a new path around it. • The National Guard held training exercises on the ungrazed portion of our allotment about every other year throughout the 1990's. They generally came with 50-60 vehicles, both wheeled and track. Each training year these vehicles traversed large swaths of ground turning up berms and stirring soil which the wind then dispersed. The roads simply deteriorated into a fine powder anywhere from four to eight inches deep. All of that powder then blew out of the newly created ruts. That type of high use changed some of the ground permanently. • Livestock watering areas were another place where the ground was disturbed, and dust would blow. It was a downright inhospitable place to be for man and beast on a windy day. These gathering areas for cows could be one to two acres in size.	The Access Roads section in EIS Appendix 11 (Project Elements Common to All Action Alternatives) describes the construction and maintenance of access roads; the only travel that would occur off of established access roads is overland crane travel. EIS Section 3.2 (Air Quality) discusses impacts related to fugitive dust and EIS Section 3.13 (Soils) discusses impacts to soil and plant growth materials (including topsoil). As described in both of these sections, a number of measures would be implemented to minimize or avoid impacts related to fugitive dust and topsoil loss; a complete list is provided in EIS Appendix 4 (Mitigation). Also see the Reclamation Plan (Appendix E in MVE [2023]) for a description of interim reclamation and revegetation measures that would be implemented in work areas following construction.
3811-4	Alwena Savage	2-What will be the effect of magnesium chloride after 30 years? How long will it stay in the soil after the turbines are gone?	Lewis (1999) found that the use of magnesium chloride as a deicer for roads is highly unlikely to cause or contribute to environmental damage at distances greater than 20 yards from the roadway. MVE does not propose to apply magnesium chloride as a deicer on project roads. Magnesium chloride applications for dust control on project access roads would only occur once per year during the construction period (although a second application may be required in some high-traffic areas) and would not occur during operations. Magnesium chloride application rates for dust control would be similar to those for deicing but occur much less frequently. Therefore, the use of magnesium chloride for dust control during project construction is not anticipated to result in any adverse effects or long-term increase in soil concentrations of magnesium chloride. Lewis, W.M. 1999. *Studies of Environmental Effects of Magnesium Chloride Deicer in Colorado, Final Report*. Report No. CDOT-DTD-R-99-10. Denver: Colorado Department of Transportation Research Branch.

Comment ID	Commenter	Public Comment	Response to Comment
5896-17	Mike Tylka	Soil and Plant Group Materials. One of our SRCP Board members operates a business in land and soil use and this project would greatly infringe on an already fragile desert environment. Noxious weed spread and soil degradation would result.	Impacts to soils are disclosed in EIS Section 3.13.1.2 (Soils, Impacts). Impacts related to weeds and other invasive plant species are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief) (see AIB-41). Both sections describe the measures that would be implemented to minimize or avoid these impacts; refer to EIS Appendix 4 (Mitigation) for a complete list. Additional information can be found in the Reclamation Plan (Appendix E in MVE [2023]) and the Noxious Weed Management Plan (Appendix R in MVE [2023]).
7359-1	Name Not Provided	The turbine wind farm impacts their entire farm and neighboring farms. Building and maintaining a turbine requires heavy equipment that damages dirt drainage tiles under fields, which then effects drainage in surrounding fields. Drainage problems can hurt crop yields and even stop a farmer from being able to plant in the first place.	Under all action alternatives, turbine construction and maintenance would occur within the siting corridors, which do not include active agricultural fields. Heavy equipment and vehicles would access the siting corridors area via access roads that are immediately adjacent to agricultural fields. However, as described in EIS Section 3.14.1 (Traffic Patterns), primary access routes were identified based on consideration of roadway limitations (e.g., size, weight, and seasonal restrictions), and MVE would improve roads as necessary to accommodate heavy or oversized equipment. MVE would also be responsible for obtaining required approvals from ITD or the local highway districts and would comply with the terms and conditions of those approvals. Further, MVE would be required to coordinate with ITD and the local highway districts to determine if additional maintenance would be required and to coordinate on repairs to roadways following project construction. Given that no heavy equipment use or vehicle travel would occur in agricultural fields, that the existing roads in the analysis area already accommodate heavy equipment and vehicles associated with agricultural operations, and that MVE would improve and repair access roads as necessary to accommodate heavy equipment and vehicle traffic associated with the project, there would be a very low potential for damage to drainage tiles and other agricultural infrastructure. Additionally, wind energy projects occur in agricultural areas around the world; there is no evidence to date that they have damaged crop yields.

Transportation

Table A-3w. Transportation

Comment ID	Commenter	Public Comment	Response to Comment
10471-2	Brett Lemmons	We then have our 2 lane country roads that are not set up for a large project, who will pay to repair that? Idaho?	AIB-37 and AIB-38 in EIS Appendix 3 (Issues Analyzed in Brief) of the EIS address the potential effects of project construction and operation on maintenance needs for major public roads. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
11199-1	J Yamamoto, B Yamamoto, D. Miller, S Okamura, T. Robison, M Woods, M. Yamamoto-Howland, R Yamamoto, K Waters, G Watanabe, J Nakanishi, D. Nakanishi, J Naito, P Okamura Sr., W. Nakanishi, N Yamamoto, S. Yamamoto, T Hadway, T. Waters, K Hadway, K Yamamoto, C. Waters, B. Farner, R Yamamoto-Farner, D. Yamamoto	In addition, the assembly of all the turbines will present additional on- going traffic to an already congested, construction ridden I-84.	Section 3.14.1 (Traffic Patterns) of the EIS analyzes how traffic associated with the project would affect existing traffic patterns (including changes to annual average daily traffic and level of service) on major public roads.
11204-29	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	D. Permittees requested to limit Project-related access road development to "existing roads" with additional construction of "side-access roads." See 2022 Comments, pg. 6. The 2022 Comments requested that access to the proposed Project infrastructure use "existing roads" and that "side-access roads" be constructed only to the extent necessary (2022 Comments, pg. 6). The DEIS addresses this request superficially but appears to fail to implement the request with meaningful substance. The DEIS at pg. 3-123 reports that "MVE would maximize use of existing roads, thereby keeping new construction to a minimum (applicant-committed measure 38)" (also see similar applicant-committed measure 17). The Draft Appendix J of the DEIS (Road Design, Traffic and Transportation Plan) reports: "Maximum use will be made of existing roads, thus keeping new construction to a minimum" (DEIS, Draft Appendix J [Road Design, Traffic and Transportation Plan], pg. J-4). Similar statements are made by the DEIS Appendices at the following pages: Appendix M, pgs. 56 & 58-59; Appendix T, pg.T-30; Appendix U, pgs. U-12 & U-a-3; and Appendix 11, pg. App11-8. Despite frequent repetition of the claim within the DEIS that the proposed Project would maximize use of existing roads to keep new construction to a minimum, the fact is that each action alternative anticipates more than twice as many miles of "new" access roads when compared to miles of "existing roads" to be "improved" for project access. This casts doubt on whether any real effort was made in the planning process to prioritize the use of existing roads for Project	Existing roads within siting corridors include both paved and unpaved roads, which may not be appropriate for project-related use due to safety or design concerns. The majority of existing roads in siting corridors (approx. 300 out of the 400 total) are unpaved and many are used for OHV travel.

Comment ID	Commenter	Public Comment	Response to Comment
		access over the construction of “new” roads. This is particularly true when one sees that the DEIS reports that there are “approximately 401 miles of existing roads (paved and unpaved)” in the analysis area (the proposed Project’s siting corridors) for pollinators (DEIS, pg. 3-303) and compares this value to the anticipated construction of anywhere from 272 to 486 miles of new roads to access the Project under the action alternatives (DEIS, pg. ES-xi). A proposed Project that would require from 68% to 121% as many new miles of road within the Project siting corridors as the 401 miles of road already existing therein does not prioritized the use of existing roads for Project access.	
11362-1	Gena Anderson	I have concerns regarding what will happen to our roadways, including the interstate and county roads. Interstate 84 already has sections that have deteriorated and are hard to drive on. I have seen the convoy of vehicles that it takes to move just one wind turbine blade. With the amount of semi-trucks and pilot vehicles that this project would require, our roads will have a significant increase in use. My question is, who will be responsible to repair Idaho's roads when they deteriorate from the extra truck traffic? I appreciate your time in reading this letter and considering my concerns.	AIB-37 and AIB-387 in EIS Appendix 3 (Issues Analyzed in Brief) of the EIS address the potential effects of project construction and operation on maintenance needs for major public roads. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE’s responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
11411-6	Rayma Cates	Windmill construction is major construction. Large scale equipment and many, many trucks of gravel and cement are required to build a windfarm. Local roads will be harmed by the traffic and heavy equipment.	Section 3.14.1 (Traffic Patterns) of the EIS analyzes how the project would affect traffic patterns on major public roads. AIB-37, AIB-38, and AIB-39 in EIS Appendix 3 (Issues Analyzed in Brief) of the EIS address the potential effects of project construction and operation on maintenance needs for major public roads and roads on BLM lands. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). In addition, as stated in AIB-39, MVE would be required to maintain roads on BLM lands and allow public access of the road network. AIB-37 and AIB-38 have been updated to reference Section 1.3.9 of MVE (2023), which states that “all existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins.”
11500-1	Jonathan Bateman	I am writing to bring attention to the potential negative effects of the Lava Ridge Wind Farm on the county highway districts in the project area. In particular, I am concerned about the impact of adding miles of access roads for the wind farm, and the potential for increased maintenance and repair costs for the county highway districts. Studies from other wind farms have shown that adding miles of access roads for wind turbines can have negative effects on county highway districts. For example, a study of the effects of wind farms on county roads in Texas found that the construction of wind turbines and associated access roads led to increased wear and tear on county roads, which resulted in higher maintenance and repair costs for county highway districts. Another study of the effects of wind farms on county roads in Oklahoma found similar results. Given these examples and the potential negative impacts of the Lava Ridge Wind Farm on the county highway districts in the area, I urge you to conduct a comprehensive analysis of the potential impacts on county roads in the area. This analysis should include an evaluation of all the potential costs to county highway districts for maintaining and repairing roads affected by the wind farm's access roads.	Impacts to public roads are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-37 through AIB-39. As described in these AIBs, MVE is responsible for obtaining the appropriate permits for the use of public roads and for addressing any impacts to public roads resulting from the project. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE’s responsibilities surrounding anticipated maintenance and repair needs during construction and operation. Also, applicant-committed measure 38 (in EIS Appendix 4 [Mitigation]), would minimize effects to roads by ensuring that all existing public roads that are used or improved by MVE during the course of construction would be left in a condition that is as good as or better than their condition when the construction period begins in accordance with [MVE’s] agreements with the associated governing body. Roadways identified for use would be videotaped and accompanied by supporting notes prior to construction.
11511-1	Elizabeth (No Last Name Provided)	I recently drove to and from Sun Valley from Twin Falls. I carefully noticed how the flow of traffic was impacted by a wide-load transportation convoy while I was driving on Highway 93. There was a huge line of vehicles behind this convoy on the two-lane highway stretch which traveled very slowly. This is already a heavily travelled road every day. What danger would be added to daily travel on Highway 93 with the addition of up to 2,427,698 trips, some transporting the massive equipment during the project? (according to Table 2.4-3. Traffic Details on Page 2.9 of the Lava Ridge Environmental Impact Statement.)	Section 3.14 (Transportation) of the EIS analyzes how traffic patterns on major public roads would be affected by project-related construction, operation, and decommissioning trips. As discussed in Section 3.14, the project would increase traffic volumes and cause delays at entrances during construction, and traffic-control measures would be implemented during construction to ensure safety and to minimize traffic congestion.
11535-142	Steven Andersen	The full extent of this project requires the expansion of existing roads and the building of new ones. The DEIS states that some or all intersections involved would require some improvements to accommodate turning requirements for construction vehicles, and to resolve other conflicts with road signs, property fences, light poles, height clearances, fire hydrants, or buildings. This project necessitates improvements to intersections, bridges, and expansion of existing highways. While the DEIS addresses the necessary improvements at length, it provides no timetable for any of the improvements. The construction of all these moving parts certainly will affect the duration of the project as well as the traffic analysis. Without a specific timeframe for these improvements, the DEIS’s conclusions cannot be relied upon.	Roadway improvements would occur during the 2-year construction period. As stated in MVE (2023), MVE plans to begin construction after all applicable permits and approvals for construction have been obtained. MVE (2023) estimated construction would occur between 2023 and 2025 (see Section 1.1 of MVE [2023]); however, this schedule is subject to change based on permitting timelines.
11535-143	Steven Andersen	Additionally, the DEIS proposes traffic management strategies. Yet, these strategies are only proposals and cannot be trusted with any certainty. The DEIS states that certain strategies “would be considered” or “may be scheduled.” There is no indication of what party will be considering or scheduling these measures. Moreover, the phrasing implies that the measures are completely discretionary. As such, the DEIS cannot rely on them in its analysis.	The traffic management measures listed in EIS Appendix 4 (Mitigation), Table App4-2e, of the EIS are applicant-committed measures (i.e., MVE’s responsibility) and are not discretionary. These measures are part of the Proposed Action and were used to evaluate the impacts described in Chapter 3 (Affected Environment and Impacts).
11614-1	Amy Alves	One issue that was not addressed in the EIS is the impact on the communities of Eden and Hazelton of construction traffic through our small town. The EIS and Luke Papez have discussed that during the construction phase, there would be thousands of trips made by vehicles through both of these towns. My concern is that the planned routes are not rated for large trucks and heavy construction vehicles. Parts of these roads are single	Section 3.14 (Transportation) of the EIS shows the location of the project’s proposed haul routes and access roads on Figure 3.14-2. This figure also shows where the towns of Eden and Hazelton are relative to the proposed haul routes and access roads. As shown on Figure 3.14-2, there is an alternate primary haul route and access road that crosses through the town of Eden; no haul routes or access roads cross through the town of

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		lane roads through residential neighborhoods that would be inappropriate for such large vehicles transporting construction equipment and wind turbine parts. The roads are not wide enough, nor are they rated for such heavy construction vehicles. The proposed constructions routes through Eden and Hazelton are also on school bus routes that would pose safety issues for students. The Lava Ridge project is inappropriate for this area as the construction would cause safety issues for school busses, students walking to and from bus stops, and the residents of Eden and Hazelton.	Hazelton. Alternate primary routes are described in Section 3.14.1.1.1 (Roadways) as roads that may be used for turbine delivery if primary routes become overly congested or inaccessible, and proposed access roads would be used as secondary routes. Section 3.14.1.1.3 (Traffic Volume and Level of Service) explains that most (95%–99%) of the project construction vehicles would access the siting corridors along U.S. 93 and ID 24; for this reason, MVE's transportation assessment for the project evaluated project effects to the roadway capacity LOS for these two delivery routes only. Although it is unknown how many trips would occur on the alternate haul route and access road that crosses through the town of Eden, MVE would coordinate with ITD and the local highway districts to determine if additional maintenance would be required and to coordinate on repairs to roadways following project construction. As stated in Section 1.3.9 of MVE (2023), all existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins. In addition, roadway improvements would be made to accommodate anticipated vehicle loads, turning requirements, and other conflicts, as needed.
11787-3	Representative Jack Nelsen	LS Power has not met with any road departments or highway districts. They are skirting the issues of the use of and damage to local roadways by heavy equipment used during the construction process. It is not only the responsible thing to do – it is necessary to leave the communities whole and in better shape than when the project began. These issues must be addressed before a project can be given the green light.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. As stated in Section 1.3.9 of MVE (2023), all existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins in accordance with the project's agreements with the associated governing body. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
11788-2	Representative Jack Nelsen	2. There has been no contact from LS Power to the local road departments and highway districts. The traffic from the construction as well as road damage due to heavy equipment has not been addressed. Nor has any thought been given to the dust generated by driving equipment through the desert.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation. The effects of fugitive dust on various types of resources have been analyzed throughout the EIS in the following sections: AIB-9, AIB-49, and AIB-59 of EIS Appendix 3 (Issues Analyzed in Brief); Section 3.2 (Air Quality); Section 3.4 (Climate and Greenhouse Gases); Section 3.5 (Cultural Resources); Section 3.6.1 (Environmental Justice Communities); Section 3.16 (Visual Resources); and Section 3.18 (Wildlife). In addition, EIS Appendix 4 (Mitigation) includes several applicant-committed measures to prevent and minimize the effects of dust (see Table App4-2l in EIS Appendix 4).
11978-135	Magic Valley Energy, LLC	37. Section 3.14.1.2.2 Transportation - Alternative B (Proposed Action) "Alternative B would generate a total of 810,930 one-way trips during the 2-year construction period, with an average of 7,724 trips per week or 1,103 trips per day (Table 3.14-3) (RCC 2022)." The total number of trips – 810,930 – does not match up with Table 3.14-3 Vehicle Trip Estimates by Action Alternative, which shows 812,882 trips total for construction. Please reconcile.	The text has been revised to be consistent with the number of trips reported in Table 3.14-4.
11978-136	Magic Valley Energy, LLC	38. Section 3.14.1.2.2 Transportation - Alternative B (Proposed Action) "The maximum number of operation and maintenance workers commuting to the site on a single day would be 60 ; however, the number of operation and maintenance workers would be closer to 40 during operation. These additional trips would have no noticeable effect on existing roadways within the analysis area, and existing LOS would remain unchanged." In the MVE 2022 POD Section 4.3, it is noted that up to 75 workers may be commuting to the site in a single day. Additionally, the same section of the POD states there are estimated to be 20 full-time workers that consistently go to the site, rather than 40 as stated in the DEIS. MVE asks the language be updated: "The maximum number of operation and maintenance workers commuting to the site on a single day would be 75 ; however, the number of operation and maintenance workers would be closer to 20 during operation. These additional trips would have no noticeable effect on existing roadways within the analysis area, and existing LOS would remain unchanged."	Revised as suggested.
12233-5	Elizabeth Lampert	The EIS does not mention the potential environmental damage to maintain dirt access roads with chemicals to mitigate for dust and vegetation control.	Potential mitigation measures related to dust control and the use of chemical palliatives are included in EIS Appendix 4 (Mitigation), Table App4-2l. In addition, project-specific mitigation measure f (EIS Appendix 4, Table App4-4) would prohibit the application of palliatives within 150 feet of surface water features; this measure would be a part of Alternatives C–E, and the Preferred Alternative would be added as mitigation to Alternative B.
1230-1	Carolyn Dimond	Our concerns about access roads to get to the wind farm. These roads are improved for current public transport. The current roads have been built and maintained by local taxpayer funds. The DIES states in their components section of EIS report, that roads will need to be improved, but doesn't state their commitment to do so, and says nothing about maintaining public roads. These roads were built with local weight limits in mind. The vehicles using these roads are permitted for these weights only. Huge oversized, both in weight and length, trucks will destroy these roads and will cost taxpayers money to repair and maintain. The load limits are not set up for	AIB-37 and AIB-38 in EIS Appendix 3 (Issues Analyzed in Brief) of the EIS address the potential effects of project construction and operation on maintenance needs for major public roads. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). As stated in Section 1.3.9 of MVE (2023), all existing public roads that are

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		mega sized loads, nor do area residents want them to be. They are also not set up for wide load turning. It is simple that 2.4 million trips is going to cost tremendous amounts of money and loss of property for the right of ways. One lady stated that she was being bullied into letting them use her property. Yes, she had been approached by MVE and threatened with emanate domain if she didn't sell the needed property to make the turns. It just doesn't affect the roads close to the project but all the roads leading to the project clear across the state.	used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
12371-3	Alan Hansten; Northside Canal Company	Next, the construction activities stand to impact NSCC operations due to the use of various county roads to access the proposed project. There are only certain access points to the Lava Ridge area, including crossing certain bridges over NSCC canals. The sheer volume of traffic and large machinery that are required for this project may threaten the viability of those bridges and access points. This was not evaluated by BLM in the draft EIS.	MVE's transportation assessment for the project (cited as Mott MacDonald 2021a in the EIS) evaluated the load bearing capacity of bridges along haul routes using bridge inspection data from ITD, and identified four bridge crossings of concern (one along U.S. 93, two along ID 24, and one along 750 East Road) that may require improvements to accommodate anticipated vehicle loads (see Section 3.14 [Transportation] of the EIS).
12398-20	US Environmental Protection Agency	Transportation and Installation of Large Land-based Turbines Given the potential logistical challenges for the transport of large land-based turbines in the rural area of the project, EPA recommends the FEIS include: • A summary of the commercial availability of land-based wind turbine components that can meet potential transportation challenges for large diameter towers and blades. • A more detailed description of possible transportation routes of the turbine component deliveries to the project site including a discussion of whether there are likely limitations (e.g., existing bridges or highway underpasses that are too low or narrow), for transporting the turbines. Ensure the discussion includes proposed turbines larger than 3-MW. Describe measures or modifications that may be necessary to address the limitations. • Discuss project permits and other authorizations that will be necessary for transportation of oversized and heavy turbine loads, and conditions to reduce impacts to existing transportation infrastructure and networks.	Figure 3.14-2 in Section 3.14 (Transportation) of the EIS, shows the location of the project's proposed primary haul routes, alternate haul routes, and access roads. As described in Section 3.14.1.1.1 (Roadways), primary routes include major highways and arterial roadways that would be used to access the siting corridors from the surrounding regions; alternate routes may be used for turbine delivery if primary routes become overly congested or inaccessible, and proposed access roads in the siting corridors would be used as secondary routes. As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE does not currently have information regarding the origin of turbine components, equipment, and materials. MVE will have limited control over what routes are used outside of the project's immediate surrounding area. As stated in Section J-3 of the Road Design, Traffic and Transportation Plan, much of the existing road network will require improvements, and final road dimensions will be influenced by turbine model selection and requirements from the engineering, procurement, and construction contractor. Turbine component delivery will likely require the expansion of intersections at existing roadways to accommodate larger loads. Where road intersection improvements are required to accommodate extra-long vehicles, potential upgrades could include relocating signs, placement of temporary paving, and the use of flaggers, as needed. Permits and approvals that would be necessary for transportation of oversize and overweight vehicle loads are listed in EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies) and are further discussed in AIB-38 of EIS Appendix 3 (Issues Analyzed in Brief). As stated in AIB-38, MVE would be required to obtain permits from the appropriate state and local jurisdictions for transportation of oversized and heavy loads. Through these permitting authorities, MVE would be required to follow all requirements for traffic control and other traffic and safety BMPs, as required by the permitting agencies.
12398-21	US Environmental Protection Agency	The U.S. Department of Energy acknowledges challenges for the transportation and installation of large turbines for land-based wind. DOE reports that the hub height for utility-scale land-based wind turbines has increased 66% since 1998–1999, to about 308 feet in 2021. Large rotor blades that cannot be folded or bent limit the routes trucks can take and the radius of their turns, and tower diameters may not fit under bridges or highway overpasses. DOE is addressing these transportation and logistical challenges through its research projects, such as: • Designing turbines with more slender and flexible blades that can navigate through curves in roads and rail lines. • Supporting efforts to develop tall turbine towers that can be produced on site.17 The DEIS describes proposed turbine hub heights up to 460 feet above the ground, depending on the turbine model and size selected. The turbine rotor blades would extend between 130 and 280 feet from the hub with a rotor diameter between 260 and 560 feet. When a blade is in line with the turbine tower, the maximum height would be between 390 and 740 feet.18 The DEIS includes the following assumptions related to turbine component delivery for the transportation analysis: • Delivery of equipment and materials would enter the analysis area by I-84 or by private rail since specific turbine component delivery routes are unknown. Routes would be determined by the turbine manufacturer and not until closer to the start of construction. • MVE or its contractors and suppliers would be responsible for permitting oversized loads associated with the project, including turbine component delivery.19 The DEIS provides limited information on the transport of turbine component deliveries to the project site on existing highways and roads. This is a concern since the NEPA analyses assume 3-MW and larger 6-MW turbines, and all action alternatives include a proposed rotor blade diameter between 260 and 560 feet and a rotor swept area between 53,100 and 246,400 square feet. Further, the project's Road Design, Traffic and Transportation Plan uses 2-MW and 3-MW turbines as typical examples and likely underrepresent impacts from larger proposed turbines.20	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE does not currently have information regarding the origin of turbine components, equipment, and materials, and MVE will have limited control over what routes are used outside of the project's immediate surrounding area. The details of the design methodologies and specifications included in the Road Design, Traffic and Transportation Plan accommodate the known turbine delivery requirements as of 2022. MVE acknowledges that, as turbine technology evolves, there may be requirements for new turbine technologies that deviate from what is described in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). As stated in AIB-38 (EIS Appendix 3 [Issues Analyzed in Brief] of the EIS), MVE would be required to obtain permits from the appropriate state and local jurisdictions for transportation of oversized and heavy loads. Through these permitting authorities, MVE would be required to follow all requirements for traffic control and other traffic and safety BMPs, as required by the permitting agencies.
12469-6	Mike Telford	Roads The DEIS states in 3.8.1.13 under right of ways "Proposed utility development……. Follow existing ROW routes". This is an impossibility in the first place because the DEIS anticipates from 370 to 400 plus miles of new roads. Road districts are passing regulations to prohibit use of their roads. The DEIS does not address the topography of the area. (see topographical maps). It may appear to be relatively flat. But it is not. There are ravines 50 to 100+ feet deep. There are unseen lava tubes as well as those that are collapsed. There are high ridges and deep crevasses leading to the world-famous Aquifer, which is the life blood of Idaho. Because of the sheer size of the turbines proposed the roads will have to be straight and long and fairly flat for the way oversized loads to move over. All existing roads and ROW are very curvy and follows the terrane. The DEIS does not address any of these extra requirements or there impacts on the land or cultural as well as living systems that are out there. The deep fills must come from somewhere and the deep cuts and blasting required are not in the estimates. The DEIS does not address the effects of the kind of road construction that would be required and their impacts. I will mention only a few.	The referenced statement in Section 3.8.1.1.3 has been revised to clarify that the statement comes from the RMP and is referencing the affected environment (i.e., past and present utility developments) and is not referring to the proposed utility developments associated with the Proposed Action. Section 3.14 (Transportation) of the EIS describes how roadway improvements would be necessary to accommodate construction vehicles. The Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]) provides further details regarding the design of access roads and the types of roadway improvements that would be required. Section 3.13 (Soils) of the EIS addresses project-related effects to soils resulting from ground disturbance. Section 3.13 references several AIBs that further evaluate potential impacts to geology and soils (see AIB-30 through AIB-36 in EIS Appendix 3 [Issues Analyzed in Brief]).

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12471-1	Regina Smith	In the transportation section, 3.14 page 3–370, " most of the construction workers would be coming from the west and south on US 93 from Jerome and Twin Falls." In the socio-economic section, 3.6, the construction workers are expected to live in Jerome, Lincoln, Minidoka counties. (Table 3.6–4) Twin Falls is not part of the analysis. This DEIS is inadequate for the size and scope of this project. Inconsistencies are frequent. The resources and/or impacts are a series of hits and misses. Some impacts are analysed on some resources, while other resources are analysed or not. Case in point, the construction workers commute or residential areas. MVE is analysing one thing and proposing something else. Their conclusions are invariably low and non-significant as a result.	EIS Section 3.6 (Environmental Justice and Socioeconomics) assumes that construction workers would include a mixture of both local (i.e., already residing in the tri-county area) and non-local workers (i.e., from the towns of Twin Falls or Burley, which are just outside the tri-county analysis area but within approximately 10 miles of the project) (see Section 3.6.2.2.2 [Alternative B {Proposed Action}]). Section 3.6 does not make any assumptions about the relative distribution of construction workers from individual towns or counties. EIS Section 3.14 (Transportation) assumes that most of the construction workers would be coming from the west and south on U.S. 93 (i.e., from the heavily populated cities of Jerome and Twin Falls, in Jerome and Twin Falls Counties, respectively) (see Section 3.14.1.2.2). However, Section 3.14 does not assume that all construction workers would reside in Jerome or Twin Falls and does not dismiss the potential for some construction workers to reside in other towns or counties. Therefore, Sections 3.6 and 3.14 are consistent and do not make contradictory assumptions about the origin of construction workers.
12984-1	Tony Owens	We are writing on behalf of the Shoshone Highway District #2. We are aware of the initial ROAD USE AGREEMENT which has been circulated, along with the ZOOM meeting held several months ago. The Highway District has not been contacted further regarding this matter. At this point the Shoshone Highway District #2 will be taking the position that the Highway District is not in favor of the Lava Ridge Project. The reason for this position is that the Shoshone Highway District is unable to ascertain the possible impact on the Highway District due to a significant lack of detailed information concerning the project, including but not necessarily limited to: 1. The Highway District needs detailed information concerning the county roads which the project intends to utilize during the preconstruction and construction process and including any possible alternated roads which may be utilized.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
12984-2	Tony Owens	2. The Highway District needs detailed information concerning the anticipated traffic during the preconstruction and construction process and the anticipated traffic subsequent to the completion of the project regarding utilization, repairs and maintenance. The Highway District needs a reasonable schedule for the timing of the various stages of the project	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
12984-3	Tony Owens	3. The Highway District needs sufficient time to evaluate the information provided concerning the project to determine the nature, extent and possible impact on the county roads sought to be utilized.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
12984-4	Tony Owens	4. The Highway District may require, at the expense of the project proponent, a report outlining the existing road structure, pavement depth, load capacity and may, in the District's discretion require load Ground Penetrating Radar Survey along the entire length of the county road(s) sought to be utilized. In the case of gravel roads, the District may require a load Ground Penetrating Radar Survey along the entire length of the county road(s) sought to be utilized. 5. The District may require an engineered study as to any required turn radius along the county road route(s) proposed to be utilized.	The BLM has considered the potential requirements from local highway districts and as appropriate has integrated those requirements within project avoidance and minimization measures.
12984-5	Tony Owens	6. In the event the road(s) sought to be utilized are insufficient to properly handle the anticipated utilization by the project proponent, then the road(s) sought to be utilized will need to be brought to appropriate necessary standards to handle the anticipated utilization for the project. The cost of the improvement to the road{s) shall be accomplished at the sole cost and expense of the project proponent and shall either be performed by the District or by a third party approved by the District and subject to the approval of the construction by the District. The District may require reasonable sums to be deposited by the project proponent to ensure the timely performance of the modifications/improvements or may require a bond to be posted to cover the faithful performance of the modifications/improvement. In the case of gravel roads, the District may require the road to be modified to meet the requirements of the proposed project, including, but not limited to additional road base, dust inhibitors or other improvements and on-going maintenance at the sole cost and expense of the project proponent. The District may also impose special speed restrictions along the proposed routes and or prohibit use of certain roads during particular times of the year, e.g. Spring thaw.	The BLM's proposed mitigation measures related to roads and traffic are included in EIS Appendix 4 (Mitigation), Table App4-2e. MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. Local highway districts may impose additional mitigation requirements through their own permitting processes. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
12984-6	Tony Owens	7. Upon completion of the foregoing requirements, the District will issue a written permit for the project which will have additional terms and conditions regarding the timing, usage of the county road(s) in use and cost of repair, replacement for any damages to the road{s) utilized.	The BLM has considered the potential requirements from local highway districts and as appropriate has integrated those requirements within project avoidance and minimization measures.
12989-1	Jim Meeks	In the Lava Ridge wind project draft environmental impact statement: Volume 1, page 3-3, figure 3.1-1 and in volume 2a, appendix J-1 through J-8, does not specify or identify the "specific" road access routes. We cannot analyze the impact on the specific access route because the draft statement data is incomplete. We say no to any access routes until we are able to analyze the impact. On 9-15-21 @ Renew Coffee Shop in Jerome, Idaho, Lava Ridge wind staff (V-pres. Mark Milburn and his staff) told us "that access would be gained	Figure 3.14-2 in Section 3.14 (Transportation) of the EIS, shows the location of the project's proposed primary haul routes, alternate haul routes, and access roads. As described in Section 3.14.1.1.1 (Roadways), primary routes include major highways and arterial roadways that would be used to access the siting corridors from the surrounding regions; alternate routes may be used for turbine delivery if primary routes become overly

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		from private property owners (like us) by either giving us a lot of money for our land to expand the roads." If we refused to sell we were told: "There is always imminent domain."	congested or inaccessible, and proposed access roads in the siting corridors would be used as secondary routes. As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE road construction and use will be coordinated with ROW and special use authorization holders, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan.
13006-34	Leon Smith	9) If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with local Highway and Irrigation Districts that maintain highways, bridges and other public conveyances in the project area.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
13008-14	Scott Hauser	3) The DEIS does a decent job of estimating the use of the roads, and it can be stated that, comparatively speaking, there will be high levels of traffic during construction. This will create a lot of noise and dust. Therefore, have the impacts of public use of the newly constructed roads been incorporated into the analysis on road use?	Public use of newly constructed roads is considered in the analysis in AIB-26 (How would the project impact public motorized access?) of EIS Appendix 3 (Issues Analyzed in Brief). In addition, effects to public access for hunting, trapping, and OHV users are addressed in EIS Section 3.12 (Recreation), and effects to big game from improved hunting access is analyzed in AIB-54 of EIS Appendix 3.
13012-6	Heather Saunders	Basalt is only part of the problem. The composition of the soil in southern Idaho will also complicate construction and necessitate building miles of roads to gain access to the area. ... Poof dust is what we call the result of heavy vehicles driving over Idaho dirt; it turns into a river of particles so fine it flows like water. That's the neat thing about clay; in both its wettest and driest states it acts like a liquid. While the area in question has a rock base they're going to have to deal with the dirt sitting on top of that rock, and that means building roads. How much wildlife habitat will be lost to those roads? They will need to keep them in place to facilitate maintenance and replacement of parts.	EIS Section 3.18 (Wildlife) analyzes the effects of access roads on wildlife habitat in several different contexts. See also AIB-54 through AIB-63 (in EIS Appendix 4 [Mitigation]) for additional analysis of project effects on wildlife species and habitats.
13013-1	David Warren	Please accept my comments concerning the Lava Ridge Wind Turbine Project EIS concerning Fugitive Dust Emissions that will be produced during the construction, operations and decommissioning of the project. According to Tables 2.4-1Project Components by Action Alternative, 2.4-2 Access Road Categories and Mileage within the Citing Corridors and 2.4-3 Traffic Details and Construction phase of the Lava Ridge Wind Project 486 miles of new roads will be constructed. Fugitive Dust Emissions will be generated and has potential to impact the air quality of the surrounding area. Magic Valley Energy proposes to use a chemical dust palliative such as Magnesium Chloride (MgCI), p3-20. Magnesium Chloride is used to control dust. Being a water soluble compound, when applied to road surfaces the MgCI will eventually be absorbed into the soil and research has shown that this will have a negative impact on soil, water, and vegetation. Water is in fact applied to the road surface first to prompt the MgCI to penetrate the soil surface to a greater depth. I will address the volume of water that is required during the application (spraying) of the MgCI. MgCI can degrade the condition of the soil by sealing the surface and by the salinization of the soil. Plant growth is affected. MgCI will even kill plant growth. I have had personal experience where MgCI killed lodge pole pine trees that were approximately 30 years old. I have no doubt that any of the vegetation on this arid area could be stunted or killed. MgCI is applied at the rate of½ gallon per square yard. As stated the Lava Wind Turbine Project proposes that 486 miles of road be constructed, please keep in mind there is no mention of the acreage of land that will be created for staging sites and construction sites that will need dust abatement. These calculations of MgCI and water only apply to the roads. MgCI weighs 11.8 pounds per gallon. The volume of MgCI for a single application to the proposed roads is 3,564,000 gallons or 21,028 tons. Also 1,782,000 gallons of water are required for that single application. With these proposed roads being created out of pristine (virgin) soil the first year will require three applications approximately 60 day apart to abate the dust, or 10,692,000 gallons of MgCI or 63,084 tons. Water required for application 5,346,000 gallons. Year two of construction would require the same 3 number of applications and the same volume of MgCI and water. The remaining 30 years of operation would require one application per year if not two. The two year decommissioning phase will require the same volume of MgCI to be applied as the initial two year construction phase. With this volume of MgCI being applied, and being applied over the Snake River Aquifer which lies under a substrate of fractured basalt, a very porous rock formation that allows most surface water to infiltrate in to the Snake River Aquifer. The MgCI infiltrating the Snake River Aquifer can cause pollution in the Aquifer which pollutes the surrounding wells.	See response to comment 3811-4 (in Table A-3v, Soils).
1361-2	Dean Dimond	In reviewing the DEIS I see that LS Power failed to make any kind of agreement with the Highway districts. In fact, all the local Highway district have submitted letters to the BLM opposing Lava Ridge. They expressed some very real problems that LS power needed to answer BEFORE the DEIS was released.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
2100-3	Office of Governor Brad Little, Office of Lieutenant Governor Scott Bedke, Office of US Senator Mike Crapo, Office of US	We are also concerned that hauling large turbine blades, hubs, and towers will be detrimental to Idaho's roads and highways. Idaho has and continues to make historic investments in transportation infrastructure.	AIB-37 and AIB-38 in EIS Appendix 3 (Issues Analyzed in Brief) address the potential effects of project construction and operation on maintenance needs for major public roads. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project

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	Senator Jim Risch, Office of Congressman Mike Simpson	The BLM needs to ensure our investments are not undone by this project and that Magic Valley Energy fully funds any damage that wind turbine components cause to the local transportation infrastructure.	construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). All existing public roads that are used or improved by MVE during the course of construction would be left in a condition that is as good as or better than their condition when the construction period begins (see applicant-committed measure 38 in EIS Appendix 4 [Mitigation]). Project access roads would be maintained by MVE throughout the life of the project. The BLM's issued ROW would include a stipulation that requires MVE to maintain the roads and allow public access of the road network. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
3041-1	Cameron Stauffer	In evaluating the EIS for the Lava Wind Project, there are issues in transportation planning. The highway districts in local areas have expressed real concern for the project. These are plans that should have been made before the EIS was proposed. Currently the highways and roads would not be able to handle the influx in traffic or construction. Additionally, the proposed routes, that would need to be improved before starting, would have to use private land for improvement.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. All existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins in accordance with the project's agreements with the associated governing body. As stated in Section 3.14 (Transportation), the BLM does not have the authority to approve or deny the use of the public roads managed by ITD and the local highway districts for the project. MVE would be responsible for obtaining required approvals from ITD or the local highway districts and would comply with the terms and conditions of those approvals. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
3042-1	Cameron Stauffer	Continuing, local highway districts have not been approached in the planning of transportation, which will also need enormous infrastructure improvement.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
3241-2	Dwight Bingham	We are writing on behalf of the Dietrich Highway District. We are aware of the initial ROAD USE AGREEMENT which has been circulated, along with the ZOOM meeting held several months ago. The Highway district has not been contacted further regarding this matter. At this point the Dietrich Highway District will be ta king the position that the Highway District is not in favor of the Lava Ridge Project. The reason for this position is that the Dietrich Highway District is unable to ascertain the possible impact of the Highway District due to a significant lack of detailed information concerning the project, including, but not limited to: 1. The District needs detailed information concerning the county roads which the project intends to utilize during the preconstruction and construction process and including any possible alternate roads which may be utilized. 2. The District needs detailed information concerning the anticipated traffic during the preconstruction and construction process and the anticipated traffic subsequent to completition of the project regarding utilization, repairs and maintenance. The District needs a reasonable schedule for the timing of the various stages of the project. 3. The District needs sufficient time to evaluate the information provided concerning the project to determine the nature, extent and possible impact on the county roads sought to be utilized. 4. The District may require, at the expense of the project proponent, a report outlining the existing road structure, pavement depth, load capacity and may, in the District's discretion require load Ground Penetrating Radar Survey along the entire length of the county road(s) sought to be utilized. In the case of gravel roads, the District may require a load Ground Penetrating Radar Survey along the entire length of the county road(s) sought to be utilized. 5. The District may require an engineered study as to any required turn radius along the county road route(s) proposed to be utilized. 6. In the event the road(s) sought to be utilized are insufficient to properly handle the anticipated utilization by the project proponent, then the road(s) sought to be utilized will need to be brought to appropriate necessary standards to handle the anticipated utilization for the project. The cost of the improvement to the road(s) shall be accomplished at the sole cost and expense the project proponent and shall either be performed by the District or by a third party approved by the District and subject to the approval of the construction by the District. The District may require reasonable sums to be deposited by the project proponent to ensure the timely performance of the modifications/improvements or may require a bond to be posted to cover the faithful performance of the modifications/improvement. In the case of gravel roads, the District may require the road to be modified to meet the requirements of the proposed project, including, but not limited to additional road base, dust inhibitors, or other improvements and on-going maintenance at the sole cost and expense of the project proponent. The District my also impose special speed restrictions along the proposed routes and or prohibit use of certain roads during particular times of the year, e.g. Spring Thaw. 7. Upon completion of the foregoing requirements, the District will issue a written permit for the project which will have additional terms and conditions regarding the timing, usage of the county road(s)in use and cost of repair, replacement for any damage to the road(s) utilized. A copy of this letter is being sent to the Idaho Transportation Department and local legislators for our District to	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. As stated in Section 3.14 (Transportation), the BLM does not have the authority to approve or deny the use of the public roads managed by ITD and the local highway districts for the project. MVE would be responsible for obtaining required approvals from ITD or the local highway districts and would comply with the terms and conditions of those approvals. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.

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		keep them informed as to the status of the project as will as the Bureau of Land Management. The District is happy to visit with you in more detail about the matter at your convenience. Please feel free to contact any Commissioner or Scott Zimmers, Superintendent of the Dietrich Highway District.	
3997-1	Angelee Eames	To all concerned: Several issues jump out to me in the DEIS. Please review my comments and determine if they are fully answered in the EIS and a common response by LS Power and MVE they will "mitigate any issue that occurs." 1. According to the EIS 486 miles of new roads and 147 miles of road improvements to existing roads. How and when will MVE and LS pay to improve public roads-does BLM pay to build county roads that will ultimately have huge traffic impacts- The County Commissioners in Jerome, Lincoln and MInidoka have all come out with statements in opposition to this Lava Ridge Project. They know it will cost their counties-not benefit them! Roads can be ruined by heavy trucks driving heavy loads to and from the project's 300 square miles.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. All existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins in accordance with the project's agreements with the associated governing body. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
4966-1	Brinya Olmstead	My family and I drove out to the south side of the proposed project last week and the desert roads were muddy and virtually unpassable unless you wanted to risk getting stuck every couple miles and tearing up the surrounding grassland by driving off road. We turned around, but what is LS Power going to do in these conditions? Won't there be a significant amount of time each winter that they are unable to work due to unpassable roads? I read that they are going to build 600 miles of road to accomplish this project. The amount of gravel and maintenance that will be required to keep these roads passable to heavy equipment during the winter months seems to me that it will be Very disruptive to the native wild life and beauty of our desert. This will not end with the end of construction as I can only assume that these gigantic windmills will need constant maintenance that can only be performed with large equipment.	MVE's proposal for roadway maintenance is described in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]) and in EIS Appendix 3 (Issues Analyzed in Brief) (see AIB-37 through AIB-39). As described in Section J-5 (Post Construction Access Road Maintenance) of the Road Design, Traffic and Transportation Plan, the project access roads will need to provide all-weather access and will require periodic maintenance throughout the life of the project. Certain natural events, such as winter storms and major rainfall events, may require immediate access road maintenance. Typical maintenance activities include monitoring, blading, surface replacement, dust abatement, spot repairs, slide removal, ditch cleaning, culvert cleaning, litter cleanup, noxious weed control, and snow removal. The effects of maintenance activities (including but not limited to access road maintenance) on wildlife are analyzed in EIS Section 3.18 (Wildlife). As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. All existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins. In addition, as stated in AIB-39, MVE would be required to maintain roads on BLM lands and allow public access of the road network. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.
5189-9	Traci Wood	What about all the roads and traffic? Does it affect the Jerome Air Port? Our Emergency systems, plane flying during wildfire season fighting the BLM fires?	Project-related effects on wildfire response and suppression efforts (including, but not limited to, aerial suppression efforts) are analyzed in EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression). Project-related effects on aviation uses (e.g., airports) and first responder communication pathways are analyzed in EIS Section 3.8 (Land Use and Realty). Project-related effects on emergency responders are further analyzed in AIB-11 of EIS Appendix 3 (Issues Analyzed in Brief).
5367-1	Harold Dimond, Carolyn Dimond	Our concerns about access roads to get to the wind farm. These roads are improved for current public transport. The current roads have been built and maintained by local taxpayer funds. The DIES states in their components section of EIS report, that roads will need to be improved, but doesn't state their commitment to do so, and says nothing about maintaining public roads. These roads were built with local weight limits in mind. The vehicles using these roads are permitted for these weights only. Huge oversized, both in weight and length, trucks will destroy these roads and will cost taxpayers money to repair and maintain. The load limits are not set up for mega sized loads, nor do area residents want them to be. They are also not set up for wide load turning. It is simple that 2.4 million trips is going to cost tremendous amounts of money and loss of property for the right of ways. One lady stated that she was being bullied into letting them use her property. Yes, she had been approached by MVE and threatened with emanate domain if she didn't sell the needed property to make the turns. It just doesn't affect the roads close to the project but all the roads leading to the project clear across the state. Please consider all these ramifications in your decision and not allow them to come to our valley.	See response to comment 11411-6 (see in Table A-3w, Transportation).
5896-10	Mike Tylka	Local commerce roadblocks. 400 towers will require 4,000 trips of major components such as tower tubes, nacelles and blades to the sites. We have many individuals in the area that have to commute to the Wood River Valley to work. We have local commodity transport such as milk, sugar beets, cattle, sheep and grain that have to go to market. Transporting these oversize pieces of equipment on the arterial highways from the interstate to their destination will hamper commerce.	EIS Section 3.14 (Transportation) analyzes how traffic associated with the project would affect existing traffic patterns on major public roads, including I-84, U.S. 93, ID 24, ID 25, and local county roads. As stated in Section 3.14.1.2.2 (Impacts, Alternative B [Proposed Action]) construction-related vehicles would temporarily change traffic patterns on U.S. 93 and ID 24 in the analysis area through increased passenger and commercial trips, temporary lane closures and detours during proposed roadway improvements at siting corridor entrances, and increased congestion and travel times. Temporary lane restrictions, road closures, or other traffic delays would also occur during roadway improvements. It is unlikely that construction traffic would affect I-84 or other roadways near the I-84 corridor where exiting traffic counts are high. However, short-term delays at intersections along the haul route may occur during turbine component delivery. Although the LOS for U.S. 93 and ID 24 would be reduced during peak hour construction traffic, most segments of U.S. 93 and ID 24 would maintain an LOS D or better, which ITD considers acceptable for peak hour conditions. Only one short segment of U.S. 93 north of ID 25 would be reduced to an LOS E during peak hour traffic, and traffic management strategies would be considered to minimize this impact. In addition, degraded LOS conditions are based on the peak week of construction and would not occur during the entire 2-year construction period. MVE's applicant-committed measures 31 through 42 (see EIS Appendix 4, Table App4-2e) would be implemented and would reduce potential impacts to traffic patterns in the analysis area during construction and operation by limiting use of roads outside work areas, through the use of traffic control measures, by repairing and restoring roads postconstruction, and by coordinating any changes to traffic patterns with local authorities and right-holders

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			within the siting corridors. Based on the results presented in the EIS analysis, the effects of project related traffic on local commerce are not expected to be measurable to a degree that would warrant detailed analysis of effects in the EIS.
7318-1	Linda (No Last Name Provided)	Local roads,bridges and highway damage from large trucks. Our local communities will be mostly responsible for fixing the damage and where will that money come from?	AIB-37 and AIB-38 in EIS Appendix 3 (Issues Analyzed in Brief) address the potential effects of project construction and operation on maintenance needs for major public roads. As stated in AIB-38, MVE would coordinate with ITD and the local highway districts regarding the need for repairs to roadways following project construction. If any impacts occur to existing major public roads, MVE would be required to address those impacts. These requirements would be disclosed as part of the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). All existing public roads that are used or improved by MVE during the course of construction would be left in a condition that is as good as or better than their condition when the construction period begins (see applicant-committed measure 38 in EIS Appendix 4). Project access roads would be maintained by MVE throughout the life of the project. The BLM's issued ROW would include a stipulation that requires MVE to maintain the roads and allow public access of the road network.
7334-2	Terry Ruby	Then lets talk about the dust these vehicles will generate. The roadways out there now turn to powder in the summer and muck in the winter and spring. Who is going to be responsible for maintaining these roadways?	EIS Section 3.2.1 (Construction Air Quality and Air Quality–Related Values) analyzes potential effects of the project on dust and air quality. MVE's proposal for roadway maintenance is described in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]) and in Appendix 3 (Issues Analyzed in Brief) of the EIS (see AIB-37 through AIB-39). As described in Section J-5 (Post Construction Access Road Maintenance) of the Road Design, Traffic and Transportation Plan, the project access roads will need to provide all-weather access and will require periodic maintenance throughout the life of the project. Certain natural events, such as winter storms and major rainfall events, may require immediate access road maintenance. Typical maintenance activities include monitoring, blading, surface replacement, dust abatement, spot repairs, slide removal, ditch cleaning, culvert cleaning, litter cleanup, noxious weed control, and snow removal. See response to comment 8640-2 (see in Table A-3w, Transportation) regarding MVE's maintenance responsivities.
8640-2	Jarred Moore	The Highway District has received a copy of the letter that was presented by Minidoka Highway District addressing their concerns about the Lava Ridge Project moving forward. At this time the Hillsdale Highway District would have to CONCUR with Minidoka Highway's concerns that were stated, but not necessarily limited to future concerns that may have not been identified yet.	As stated in the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), MVE will comply with any required road design and will acquire any necessary permits related to traffic and transportation for the project. MVE will coordinate with local planning authorities regarding increased traffic during the construction phase, and specific issues of concern will be addressed and incorporated into the Road Design, Traffic and Transportation Plan. All existing public roads that are used or improved by MVE during the course of construction will be left in a condition that is as good as or better than their condition when the construction period begins in accordance with the project's agreements with the associated governing body. As stated in Section 3.14 (Transportation), the BLM does not have the authority to approve or deny the use of the public roads managed by ITD and the local highway districts for the project. MVE would be responsible for obtaining required approvals from ITD or the local highway districts and would comply with the terms and conditions of those approvals. At this time, the BLM understands that MVE initiated their engagement efforts with local highway districts in 2021 and would continue working with them to identify potential issues associated with project-related use of district roads and MVE's responsibilities surrounding anticipated maintenance and repair needs during construction and operation.

Vegetation

Table A-3x. Vegetation

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10482-1	Joseph Alexander	According to the EIS it does not seem to have sufficient data at the time of the publication of the document, your map is out of date so this should make your application non valid. This is from the EIS 'The Project layout was not available at the time of survey; therefore, the Study Area was defined as the entire Project area (Figure 1). The vegetation assessment included agency coordination, a desktop assessment, and field survey. Details are provided below'	See Section 3.1.2.3 (Siting Corridor). The text provided by the commenter is not from the EIS; this text is a quote from the vegetation assessment memo (WEST 2020). As stated in EIS Section 3.15 (Vegetation), the EIS used a variety of vegetation data (not limited to WEST 2020), which were sufficient for the NEPA analysis.
11204-31	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	F. Permittees requested that MVE assumes the cost and obligation to implement weed control and garbage removal adjacent to Project-related roads. See 2022 Comments, pg. 7 & 9. The 2022 Comments requested that the applicant (MVE) "assumes the cost and obligation to mitigate any weed control and garbage removal adjacent to the roads" associated with the proposed Project if it is approved (2022 Comments, pg. 7). The 2022 Comments also requested that such costs and obligations regarding weed control and garbage removal be applied to all "as constructed" Project-related facilities during each phase of the proposed Project (2022 Comments, pg. 9). The DEIS does not adequately address this issue.	See EIS Appendix 4 (Mitigation) for a complete list of measures that would be implemented to minimize or avoid impacts related to nonnative plants and noxious weeds. All measures would be MVE's responsibility. Alternative B describes MVE's proposal, which does not explicitly state they would bear the cost of all measures. However, the BLM would require additional measures; these measures are described throughout the EIS as Alternative B with Additional Measures. If the BLM selects Alternative B, the additional measures would be required. Those measures would also be required for the other action alternatives because they would be included as part of the alternatives' description (i.e., they would not be additional measures, they would be part of the alternative description from the start). The BLM can suggest changes to MVE (2023); however, if MVE chooses not to make the changes, then the BLM can enforce the changes by adding additional mitigation measures through the NEPA process.

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		Under its analysis of avian and bat species, section 3.3 of the DEIS reports under “Alternative B with Additional Measures” that additional measures would be imposed to minimize impacts, including “Measure rr” which would make MVE “responsible for control of weed and nonnative species that result from construction, use, or maintenance authorized in their ROW grant” and would require MVE to “coordinate with the Authorized Officer and/or local authorities for acceptable weed control measures (within limits imposed in the grant stipulations) prior to implementing weed treatments” (DEIS, pg. 3-124). See also DEIS, pgs. 3-234, 3- 254, 3-283, 3-308, and 3-482. The fact that these measures are discussed under analysis of the Alternative titled “Alternative B with Additional Measures” implies that MVE would not bear responsibility for the “control of weed and nonnative species” and would not need to “coordinate with the Authorized Officer and/or local authorities… prior to implementing weed treatments” under Alternative B as submitted by the applicant (MVE). Draft Appendix R (Draft Noxious Weed Management Plan) attached to the DEIS reports that the purpose of the Noxious Weed Management Plan is to: “report the results of a baseline noxious weed inventory… provide guidance for controlling noxious weeds during Project construction, operation, and reclamation, and provide an overview of Best Management Practices (BMPs) that will be implemented for the life of the Project.” DEIS, Draft Appendix R, Draft Noxious Weed Management Plan, pg. R-1. It is unclear why the DEIS chose to address potential shortcomings of the Draft Noxious Weed Management Plan by evaluating additional weed control and treatment stipulations (measures) under an Alternative titled “Alternative B with Additional Measures” rather than simply direct that the Draft Noxious Weed Management Plan be amended to remedy identified shortcomings. The DEIS needs to clarify that MVE “assumes the cost and obligation” for “weed control” and “garbage removal adjacent to the roads” and all other Project-related facilities during each phase of the proposed Project.	At publication of the draft EIS, and the Noxious Weed Management Plan (Appendix R in MVE [2023]) and other appendices in MVE (2023) were in draft form, with the intent that they would be updated during the development of the final EIS and ROW grant, if issued. MVE has committed to maintaining the project in a sanitary condition at all times, including the proper disposal and removal of trash within their authorized ROW (see applicant-committed measure 82 in EIS Appendix 4 [Mitigation]); additional details are in the Health and Safety Plan (Appendix F in MVE [2023]).
11363-1	Jason Parker; Tri-County Noxious Weed Control	I am writing to express my concern about the presence of noxious weeds on the property within the Lava Ridge Project. As you are aware, noxious weeds are invasive and can cause harm to the environment, agriculture, and human health. Our department is committed to monitoring and enforcing noxious weed control in our community. We want to work with you to ensure that Lava Ridge Project is in compliance with state and local regulations regarding noxious weed control. We understand that controlling noxious weeds can be a challenging and ongoing task. However, it is essential to protect the environment and the community from their harmful effects. We urge you to take the necessary steps to manage and control the noxious weeds within the Lava Ridge Project. Our department will be monitoring the project area for noxious weeds, and we will take enforcement action if necessary. We hope that you will work with us to prevent the spread of noxious weeds and maintain a healthy environment for our community. Please feel free to contact us if you have any questions or concerns about noxious weed control. Sincerely, Jason Parker Superintendent Tri-County Noxious Weed Department Serving Gooding, Jerome, and Lincoln Counties	The Noxious Weed Management Plan (Appendix R in MVE [2023]) describes ISDA rules governing noxious weeds and the measures that would be implemented to identify, monitor, and treat noxious weed populations throughout the life of the project. EIS Appendix 4 (Mitigation) includes a complete list of mitigation measures that would be implemented to minimize or avoid impacts related to nonnative plant species, including BLM-required measure ooo, which states, “MVE would be responsible for control of weed and nonnative species that result from construction, use, or maintenance authorized in their ROW grant. MVE must coordinate with the Authorized Officer and/or local authorities for acceptable weed control measures (within limits imposed in the grant stipulations) prior to implementing weed treatments.”
11426-1	Lisa Scharin	I hope that the impacts of clearing too much forest is considered-since we are losing forests to deforestation, wildfires and development as it is now. [...] We need to transition to clean, renewable energy-this is very important-it is also equally important to make sure that we do not negate any progress toward that by destroying what forests we have left-this we know forests are vital carbon sink holes-providing also-clean air and helping to reduce erosion and old growth forests can resist major wild fire risks. If there is a way to streamline this project to reduce clearing and disrupting this area-I hope that you make that a priority in moving forward. If there is an area that is already cleared and can be used to litigate altering pristine areas-PLEASE use that area! The less impact and altering this project creates-the better! We really cannot afford to lose more forests and must protect wildlife habitat too	As described in EIS Section 3.15.1.1 (Affected Environment), the analysis area is composed mostly of sagebrush steppe and grassland vegetation; forests and woodlands are not present. Impacts to native upland vegetation are summarized in EIS Table 3.15-3. See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts to native vegetation and wildlife habitat.
11487-2	Idaho Noxious Weed Control Association	We have state law and administrative rules that assist in prioritizing which noxious weeds or invasive species should be eradicated, controlled and prevented. The first tier of a project on this scale is prevention. Additionally, prevention can be easily overlooked if deadlines are trying to be met by those constructing the project. Once a noxious weed or invasive species is introduced to an area it can be very difficult, if not impossible, to eradicate it. Negotiated rulemaking will be occurring this summer (2023) on the noxious weed list. If a species does get moved to a different category during the rulemaking session, this plan should be adaptable to those changes. If changes are made, this plan should be reviewed and changed as well. We appreciate the opportunity to comment on the Lava Ridge Wind Project.	The Noxious Weed Management Plan (Appendix R in MVE [2023]) describes ISDA rules governing noxious weeds and the measures that would be implemented to identify, monitor, and treat noxious weed populations throughout the life of the project. The Noxious Weed Management Plan provides for noxious weed monitoring and control over the life of the project and will be updated as needed to address revisions to ISDA’s noxious weed rules and BLM treatment recommendations. EIS Appendix 4 (Mitigation) includes a complete list of mitigation measures that would be implemented to minimize or avoid impacts related to nonnative plant species, including BLM-required measure ooo, which states, “MVE would be responsible for control of weed and nonnative species that result from construction, use, or maintenance authorized in their ROW grant. MVE must coordinate with the Authorized Officer and/or local authorities for acceptable weed control measures (within limits imposed in the grant stipulations) prior to implementing weed treatments.”
11535-70	Steven Andersen	Furthermore, increased use of surrounding BLM-administered lands, resulting from additional access corridors (via new access roads and utility and transmission corridors) could also affect vegetation through direct injury to vegetation, the legal and illegal take of plants, and the introduction of invasive vegetation. The DEIS fails to adequately address how the spread of noxious weeds from vehicles coming in and out for construction activities will be mitigated. It also neglects any mention of illegal take of plants.	The Noxious Weed Management Plan (Appendix R in MVE [2023]) describes the measures that would be implemented to identify, monitor, and treat noxious weed populations throughout the life of the project. EIS Appendix 4 (Mitigation) includes a complete list of mitigation measures that would be implemented to minimize or avoid impacts related to nonnative plant species, including additional measures not specified in the Noxious Weed Management Plan. Impacts to vegetation from the introduction or spread of weeds and other invasive plant species are described under AIB-41 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1. As described under AIB-43 in EIS Appendix 3, Table App3-1, there are no plant species listed under the ESA that occur in the siting corridors. The term “take” as it applies to threatened and endangered species only applies to species listed under the ESA and is therefore not mentioned in this analysis. Special-status plant species that have the potential to occur in the

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			siting corridors are not at high risk of illegal collection, and potential impacts to them, as disclosed in EIS Section 3.15.2 (Bureau of Land Management Special-Status Plants), would not be unlawful.
11535-72	Steven Andersen	The DEIS does not address herbicide exposure to vegetation and animals. The DEIS's assertion that exposures are "not expected," cannot be relied upon. Site maintenance activities may include the licensed application of herbicides (i.e., pesticides) to control vegetation along access roads, utility and transmission corridors, and around support buildings and turbine towers. Herbicide use may be in addition to, or in lieu of, mowing. The accidental spill of herbicides may result in environmental concentrations exceeding licensed levels, and these herbicides could migrate off site and affect native vegetation in surrounding areas.	See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts from leaks and spills of potentially hazardous materials. Potential impacts to wildlife from herbicide use are described under AIB-58 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1.
11535-146	Steven Andersen	Moreover, much of the analysis focuses on the reclamation of the area after decommissioning of the project. Yet, because of the fragility of these species, there may very well be nothing left to reclaim after the 34-year life of the project. As these special-status plants are some of the most sensitive and fragile in the region, they merit much greater protection.	As described in EIS Section 3.15.1.2.2 (Native Upland Vegetation, Alternative B), interim reclamation would be implemented in work areas following construction; the goal of final reclamation following decommissioning would be to establish vegetation communities in disturbed areas that are comparable to the vegetation community in adjacent undisturbed areas rather than restore disturbed areas to preconstruction conditions. EIS Appendix 4 (Mitigation) includes a complete list of measures that would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria (applicant-committed measure 164). Additional details are provided in the Reclamation Plan (Appendix E in MVE [2023]). Impacts to habitat for BLM special-status plants that occur in wetland habitats would be largely minimized or avoided through the implementation of MVE's applicant-committed measures and additional measures required by the BLM. These mitigation measures also include preconstruction clearance surveys in potential habitat for BLM special-status plants that has not been previously surveyed and avoidance or mitigation of impacts to special-status plant populations identified during these surveys (if any); see EIS Appendix 4 for a complete list of mitigation measures.
11536-1	Richard Llewellyn	Foremost, the scientific literature describing attempts to restore sage steppe plant communities after disturbance is replete with cautionary findings emphasizing the difficulty in re-establishing native communities regardless of the methods and materials employed –indeed, the lack of certainty in the endeavor is the common denominator across these studies.1 Interannual variation in precipitation has long been recognized as a major determining factor in the success of restoration efforts:2 indeed prominent researchers speak of the "exceptional warm wet spring of Great Basin mythology" necessary for success of re-establishment of native perennials on difficult sites, such as those infested by medusahead grass (Taeniatherum caput-medusae).3 Even apparent success in initial establishment of a foundational species like sagebrush4 may wane or fail a decade later due to a phenomenon known as 'transient population dynamics'5 – failures that are expected to increase in the upland sagebrush steppe with expected patterns of climate change. The expected impacts of climate change are not explicitly taken into account in this EIS in evaluating the likelihood that necessary sage steppe restoration efforts will be successful. Considering that the EIS describes the expected timeline for mitigation of mature plant communities to be 84 years, a realistic account of the expected effects of climate change on these efforts is essential.	As described in EIS Section 3.15.1.2.2 (Native Upland Vegetation Impacts, Alternative B [Proposed Action]), the goal of reclamation would be to establish vegetation communities in disturbed areas that are comparable to the vegetation community in adjacent undisturbed areas rather than restore disturbed areas to preconstruction conditions. This accounts for any changes to vegetation communities that may occur from climate change and other factors during the 34-year life of the project and 50-year vegetation recovery period. The EIS also acknowledges that disturbance in very fragile soils is unlikely to be successfully restored. EIS Appendix 4 (Mitigation) includes a complete list of measures that would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria. Additional details are provided in in the Reclamation Plan (Appendix E in MVE [2023]).
11536-2	Richard Llewellyn	The EIS generally describes the degree in which plant communities have been invaded by exotic species, but does little to distinguish the impacts that invasion by distinct species are likely to have – for example, the difference in bulbous bluegrass (Poa bulbosa), commonly found onsite, from the more problematic winter annual grasses. As such, the descriptions of percent of cover by native vs non-native species are not indicative of restoration potential. The EIS largely condenses the impacts of the winter annual grasses into the challenges presented by cheatgrass (Bromus tectorum) on future fire likelihoods, site mitigation, and native plant restoration multiple times. While cheatgrass invasion represents a major and well-studied problem, the occurrence of medusahead rye (Taeniatherum caput-medusae) and its potential to replace cheatgrass7 as an even more destructive and fire promoting exotic8 that effectively smothers soil crust communities with its silica-rich thatch9, is not addressed in the EIS. Currently, large tracts of medusahead rye have become permanently established on rangelands to the east, and any major activity on public lands that disturbs soils in this region must particularize restoration or mitigation efforts in the context of this looming threat.	EIS Section 3.15 (Vegetation) describes existing conditions for vegetation in the siting corridors. EIS Section 3.15.1.1 (Native Upland Vegetation, Affected Environment) summarizes AIM data available for the siting corridors (BLM 2022a); there are no records of medusahead rye in the siting corridors. Although the species may spread to the siting corridors in the future even if the project were not implemented, if the project is approved, a number of measures would be implemented to minimize or avoid the introduction and spread of weeds and other invasive species (a complete list of measures is in EIS Appendix 4 [Mitigation]). Additional details on weed management are provided in the Noxious Weed Management Plan (Appendix R in MVE [2023]). Measures would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P in EIS Appendix 4). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria. Additional details are in the Reclamation Plan (Appendix E in MVE [2023]).
11536-3	Richard Llewellyn	More broadly, the EIS, while acknowledging that restoration of fragile soil sites representing about 12% of the overall site analyzed (about 84000 acres) may never be successful, fails to provide the most basic quantitative models of the successful restoration or mitigation that the EIS is fundamentally dependent upon for the larger area, and how success is defined. Qualitative, probabilistic models describing restoration, even with known inadequacies, need to be presented, so that the public may understand the factors and weights that are considered when the agency concludes that "These effects could last up to 84 years (34 years project construction, operation, and decommissioning plus 50 years for vegetation to reestablish after final reclamation) but would not be irreversible because most of this disturbance would be reclaimed or restored in the long term."	For the purposes of analysis, the EIS assumes that highly fragile soils are unlikely to be successfully restored and would remain permanently disturbed. As stated in the EIS, 84 years refers to areas that are not in highly fragile soils. EIS Sections 3.13.1.4 (Soils, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), and 3.15.1.4 (Vegetation, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) state that "[i]rreversible impacts would occur from ground disturbance in very fragile soils where reclamation potential would be limited because of limiting revegetation factors." And that "highly fragile soils are unlikely to be successfully restored and would remain permanently disturbed following the project." As described in EIS Section 3.15.1 (Native Upland Vegetation Communities), the assumption that native vegetation communities would require up to 50 years to become re-established is based on a review of publicly available literature on the recovery times of the most prevalent native vegetation communities in the siting corridors (i.e., sagebrush steppe and perennial grassland). Because the goal of reclamation would be to establish vegetation communities in disturbed areas that are comparable to the vegetation community in adjacent undisturbed areas (rather than to restore preconstruction vegetation communities, which are

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			predominantly nonnative-dominated), any revegetation efforts would inherently account for climate change induced alterations to native vegetation communities over the 34-year life of the project; see Section 3.15.1.2.2 (Native Upland Vegetation Communities, Alternative B). Seed mixes for reclamation would be developed in coordination with the BLM botanist, which would ensure that species best adapted to the environment at the time of reclamation are selected; additional details are provided in the Reclamation Plan (Appendix E in MVE [2023]) and the Noxious Weed Management Plan (Appendix R in MVE [2023]). As described in Section 3.15.1.2.2, MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria, which would ensure that desired vegetation communities are restored following decommissioning (see also BLM-required mitigation measure P). Therefore, probabilistic modeling to quantify the recovery of native vegetation communities during reclamation would not lead to a more informed analysis.
11536-10	Richard Llewellyn	Likewise, EIS statements such as “Project ground disturbance could increase the likelihood of introduction and spread of nonnative plants…” muddle rather than clarify the agency’s application of basic research to restoration efforts. An overwhelming conclusion of this research is that ground disturbance does rather than ‘could increase the likelihood of introduction and spread of nonnative plants’ in areas where the relevant nonnative plants exist regionally – the project site in its entirety – the only question is to the magnitude of the increased likelihood.	EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1 discusses the potential for the project to increase the introduction or spread of weeds and other invasive species in the siting corridors (see AIB-41). As described in this table, a number of measures would be implemented to minimize or avoid impacts from the introduction or spread of weeds and other invasive species (refer to EIS Appendix 4 [Mitigation] for a complete list). With the implementation of these measures, it is not expected that all ground disturbance would introduce or spread weeds and other invasive species, and therefore, “could” is more appropriate than “would.”
11563-3	Idaho Cattle Association	the Idaho Cattle Association (ICA) submits the following comments on the Lava Ridge Environmental Impact Statement (EIS). [...] The level of disturbance that this project will create is vast. The ensuing invasion of cheat grass and other invasive species is a big threat. These species have proven challenging in turning back and pose a tremendous fire risk. Although the EIS contains a mitigation plan in managing for these risks and effects, we worry about the long-term effects of the project and of the ability or requirements of Magic Valley Energy to maintain improvements for the life of the project.	Mitigation measures (detailed in EIS Appendix 4 [Mitigation]) would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria. Additional details are in the Reclamation Plan (Appendix E in MVE [2023]). Additionally, applicants are required to demonstrate financial and technical capability as part of the BLM ROW application process. MVE (2023) Section 1.6 (Financial and Technical Capability of Applicant) provides this documentation.
11776-4	Regina Smith	Surface disturbances increase the growth of non-native species such as cheatgrass, Russian thistle, and a variety of others. The impacts on these species are not analysed.	EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1, discusses impacts related to the introduction and spread of weeds and other nonnative plant species (see AIB-1, AIB-41, and AIB-57).
11849-2	Charles Brockway	Another unique feature of the area is the presence of a consistent native grassland containing little or no downy brome (cheatgrass). Almost all areas in southern Idaho, when left alone, become infested with cheatgrass, but the Lava Ridge area is one of the very few that do not. The EIS fails to adequately consider the impact of the construction and ongoing activities on the native grassland. Again, no scientifically-defensible, site-specific modeling has been conducted on the grassland impact.	See EIS Section 3.15.1 (Native Upland Vegetation Communities) for a summary of data showing the current plant species composition in the project area and the impacts to native upland vegetation, including grasslands.
11871-25	WildLands Defense	Please also assess the impacts of the construction disturbance in proliferation of flammable annual grasses. For example, Townsend’s Ground Squirrels in the Morley Nelson Snake River Birds of Prey Area are known to suffer population reductions during drought stress years in lands dominated by exotic annuals. Increased climate change effects such as higher temperatures are causing significant cheatgrass expansion. See Van Horne et al 1997. https://www.jstor.org/stable/2963457 Livestock grazing exacerbates flammable weed infestation and spread, making lands less resistant to cheatgrass and less resilient when suffering disturbance. See Reisner et al. 2013, Williamson et al. 2019.	Effects to wildlife habitat from the introduction and spread of weeds and other invasive species are described under AIB-57 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1. As stated in this table, BLM (2005) discloses potential effects to wildlife habitat from the construction, operation, and decommissioning of a wind energy facility, including effects from the introduction or spread of weeds and other invasive species. The table also describes the measures that would be implemented to minimize or avoid effects from the introduction or spread of weeds and other invasive species (see EIS Appendix 4 [Mitigation] for a complete list); additional details are in the Noxious Weed Management Plan (Appendix R in MVE [2023]). With the implementation of these measures, effects would be no greater than previously disclosed in BLM (2005) and detailed analysis in this EIS is not warranted. See EIS Section 3.7 (Fire and Fuels Management) for a discussion of potential impacts related to wildfire risk; Section 3.7.1.1.5 (Fire and Fuels Management, Existing and Future Trends and Actions) discloses the potential for climate change and livestock to increase the presence and spread of nonnative species and alter the natural fire regime.
11871-34	WildLands Defense	M-12 shows the consultants used outdated Landfire Vegetation and other data. There is a need on-the-ground current vegetation community data, and detailed mapping and analysis of cheat, medusahead, rush skeleton weed forage kochia, cwg, etc. presence. This is also critical for understanding rehab actions.	EIS Section 3.15.1.1 (Affected Environment) describes native upland vegetation communities in the siting corridors, including existing and future trends related to invasion by weeds and other nonnative plant species. The EIS uses the most current version of LANDFIRE vegetation data available from the USGS and DOA (2013). Because changes to plant communities may have occurred since the most recent LANDFIRE vegetation data was published in 2013, more recent on-the-ground data from AIM surveys in and near the siting corridors was included in describing the current vegetation community. Details on weed control and reclamation measures can be found in the Reclamation Plan (Appendix E in MVE [2023]), the Noxious Weed Management Plan (Appendix R in MVE [2023]), and EIS Appendix 4 (Mitigation).
11871-68	WildLands Defense	EIS Vegetation Appendix Document The Appendix states: “Overall, vegetation communities present within the Study Area have been altered by domestic livestock grazing and the introduction of non-native species, such as cheatgrass. Cheatgrass composed more than 50% cover in 8 of the 20 sample plots. Cheatgrass invasion has contributed to a more frequent and often more intense fire cycle, which has further facilitated its spread throughout the intermountain west region (Balsch et al. 2012). Based on BLM data (2019), review of aerial imagery, and observations made during the field survey, numerous wildfires have occurred over the last 35 years, including within the last several years. In addition to cheatgrass and other non-native invasive species proliferating in burned areas, many of the burned areas appear to have been predominantly seeded with crested wheatgrass, likely in an effort to quell the spread of cheatgrass and help stabilize soils. The results of the field survey suggest the overall vegetation composition and condition within much of the Study Area is predominantly	EIS Section 3.15.1 (Native Upland Vegetation Communities) describes vegetation communities in the siting corridors and the data sources used in the EIS. These communities are also depicted in EIS Figure 3.15-1 (Vegetation analysis area). Additional information on sagebrush steppe vegetation in the siting corridors is presented in EIS Section 3.3.4 (Greater Sage-Grouse). Biological soil crusts are discussed in EIS Section 3.13.1 (Soils and Plant Growth Materials); as described in the impacts analysis (EIS Section 3.13.1.2 [Impacts]), the analysis assumes that biological soil crusts are present throughout the siting corridors because their actual extent is unknown. EIS Section 3.15.2.1 (Bureau of Land Management Special-Status Plants, Affected Environment) summarizes the baseline resource inventories conducted for BLM special-status plants; no BLM special-status plant surveys were conducted in 2022. As described in this section, while the July 2020 habitat assessment occurred too late

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		disturbed and composed of non-native grasses. WEST recognizes the timing of the field survey may have resulted in fewer native forbs being detected and plant diversity may be higher than was recorded during the survey. However, it should also be recognized that some of the native plants that occurred historically in the Study Area may have been displaced over time (i.e., outcompeted) by invasion/establishment of non-native species. While some sensitive plant species can tolerate various levels of disturbance, they often occupy niche (i.e., micro) habitats within disturbed areas. The degraded vegetation communities encountered throughout the Study Area may be unsuitable for many of the above sensitive species; however, there is potential for some of the above species, particularly the Astralagus species, to occur in microhabitats within degraded areas in the Project. MVE anticipates pre- …". Regrettably, no adequate map of actual on-the ground current vegetation communities and biocrusts to be found here. The proposed rehab efforts are also highly uncertain and use the very same methods that have failed so spectacularly in the past to promote biodiversity and species conservation. Consultant surveys were conducted much too late for rare plants in the 2022 drought year.	in the season to detect most BLM special-status plants, the intent of the habitat assessment was to verify the results of the desktop analysis for vegetation and assess the potential for habitats in the siting corridors to support BLM special-status plants (rather than to identify individual occurrences of these species). The results of this habitat assessment were used to identify survey transects for BLM special-status plant surveys; as described in the *Sensitive Plant Species Survey Report – Lava Ridge Wind Project*. (WEST 2021), the 2021 BLM special-status plant surveys were split into three separate survey efforts timed to coincide with the flowering period of all targeted plant species. The possibility that the unusually dry conditions immediately preceding the 2021 surveys could have contributed to the lack of BLM special-status plant observations and the need for additional site-specific surveys prior to disturbance are disclosed in EIS Section 3.15.2.1. MVE has committed to preconstruction clearance surveys and avoidance (or relocation) of BLM special-status plant populations (applicant-committed measures 12, 109, and 110; see EIS Section 3.15.2.2 (Bureau of Land Management Special-Status Plants, Impacts). Where avoidance is not possible, additional measure kkk requires MVE to mitigate impacts to BLM special-status plants. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation). This list includes a number of measures that would be implemented to improve the success of reclamation efforts, including five years of monitoring, adherence to BLM-approved reclamation success criteria, and the use of adaptive management when reclamation efforts are not trending toward desired vegetation communities. Additional details are in in the Reclamation Plan (Appendix E in MVE [2023]). MVE would also be required to hold a reclamation bond, which would ensure that the BLM has the financial means to implement further reclamation if MVE is unable to meet BLM-approved reclamation success criteria; see EIS Section 3.15.2.2.
11978-137	Magic Valley Energy, LLC	39. Section 3.15.2.2.2 Vegetation - Alternative B (Proposed Action) "Therefore, acres of work area ground disturbance could last for up to 84 years (34 years project construction, operation, and decommissioning plus 50 years for vegetation to reestablish after final reclamation)." MVE asks the language be updated, as reclamation has the potential to meet criteria prior to 50 years: "Therefore, acres of work area ground disturbance could last for up to 84 years (34 years project construction, operation, and decommissioning plus up to 50 years for vegetation to reestablish after final reclamation)."	Revised as requested.
11496-7	Danielle Gunn	The wind project will increase fire hazards significantly. The DEIS does not provide an adequate fire plan. A complete list of contacts and chain of command needs to be established to manage any fire incidents. A fire plan should be developed and made available to the permittees. All MVE employees should be trained in fire prevention and management. The DEIS discusses re-seeding vegetation in disturbed areas. However, it does not mention what grass, forb, and shrub species will be used. These seed mixes need to be identified. Are introduced grasses allowed in the mixes or will they be 100% native? Introduced grasses have a history of quicker establishment and higher success rate while native species can take time to flourish and may fail completely. The DEIS discusses weed management but not in great detail. All noxious, invasive, and weedy annual plant species need to be identified in the final EIS. All potential herbicides must be listed and distributed to permittees. Permittees must be notified of what herbicides are used as many chemicals pass through the rumen unaffected and can cause crop damage if livestock are moved from a treated area to a non-treated area with sensitive crops.	A Fire Protection and Prevention Plan is provided in Section F-6 (Fire Protection and Prevention Plan) of the Health and Safety Plan (Appendix F in MVE [2023]). This plan includes details on employee training, emergency contacts, and roles and responsibilities. Details on reclamation methods are provided in the Reclamation Plan (Appendix E in MVE [2023]). EIS Appendix 4 (Mitigation) provides a complete list of measures that would be implemented to minimize or avoid impacts associated with nonnative plants and noxious weeds (including the use of a BLM-approved, weed-free seed mix), as well as herbicide applications. Additional details on nonnative plant and noxious weed management can be found in the Noxious Weed Management Plan (Appendix R in MVE [2023]). Section 3 (Baseline Noxious Weed Inventory) of the Noxious Weed Management Plan describes the baseline noxious weed inventory conducted for the project; noxious weeds detected during these inventories are listed in Table 1. Section 4.3 (Revegetation Recommendations) of the Noxious Weed Management Plan describes the seeding techniques (see Section 4.3.1) and seed mix (Section 4.3.2) that would be used during revegetation efforts. The BLM typically does not specify seed mixes more than a year ahead of seeding because seed availability varies annually and best practices are continuously improved in response to new data. As stated in Section 4.3.2, "MVE will coordinate with the BLM botanist to develop an approved seed mix for the project. A Project-specific seed mix will help ensure native plants are actively growing throughout the growing season to benefit pollinator species and reduce opportunities for noxious weeds to establish and spread." In regard to herbicide applications, EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1 (Preliminary Issues Analyzed in Brief and Supporting Rationale), AIB-58 states "MVE would comply with the applicable federal and state laws and regulations concerning the use of herbicides and other similar substances in all activities/operations, including the standard operating procedures described in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) (applicant-committed measure 101 and BLM-required measure Z). Prior to the use of herbicides, MVE would obtain from the BLM a written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary. Herbicides would not be permanently stored on public lands, and applicator(s) would hold a current applicator's license or be under the direct supervision of a licensed applicator. MVE would provide an annual report to the BLM to report type and quantities of herbicides applied to public lands." There is no requirement to notify permittees of herbicide applications on BLM land. MVE will be required to use BLM-approved chemicals but will not be required to notify permittees.
12071-1	Richard Dinges	A very noticeable feature of the Bureau of Land Management's (BLM) draft Environmental Impact Statement (EIS) for the Lava Ridge wind turbine project is that it addresses in some detail the fatalities that will be experienced by bats, birds, raptors and butterflies with impact from the operating turbines. However , no consideration is given as to what effect this will have on the ecosystem as a whole. The Lava Ridge project itself occupies nearly 200,000 acres of public lands. It abuts and partially surrounds private land that is primarily irrigated crop lands A wide variety of crops are grown on these lands. The entire area's ecosystem must be considered when evaluating this project. This evaluation is clearly absent from the EIS. The construction and	Effects to wildlife are discussed in EIS Section 3.3 (Avian and Bat Species), EIS Section 3.11 (Pollinators and Insects), and EIS Section 3.18 (Wildlife); effects to vegetation are discussed in EIS Section 3.15 (Vegetation). Additional discussion of impacts to wildlife and vegetation are in EIS Appendix 3 (Issues Analyzed in Brief), including impacts to farmland (AIB-34) and impacts to crop dusting are in Section 3.8.2 (Aviation) (see Table App3-1 [Preliminary Issues Analyzed in Brief and Supporting Rationale]).

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		decommissioning phase only focuses on the activities associated with these phases, but does not address the effects it will have on the wildlife and vegetation. The overall effect on the area's ecosystem is not considered.	
12469-3	Mike Telford	The DEIS does not address the fragile nature of a high mountain desert environment. These environments take decades to make very small almost unrecognizable changes. I have lived here for 49 years and from personal experience have seen how very slow recover from disturbance of any kind can be. The DEIS ignores this scientific fact. I believe BLM has all that information.	The nature of high mountain desert vegetation communities were considered when describing the duration of impacts to vegetation, which are stated to be the life of the project (34 years) plus 50 years for reclamation (the longest estimated time for native vegetation communities to reestablish): a total of 84 years, as described in EIS Section 3.15.1 (Native Upland Vegetation Communities). EIS Section 3.13.1.1 (Soils, Affected Environment) describes very fragile soils in the siting corridors. As stated throughout the resource analysis sections in Chapter 3 (Affected Environment and Impacts), highly fragile soils naturally have relatively little vegetative cover, and are unlikely to be successfully restored and would remain permanently disturbed following the project. EIS Appendix 4 (Mitigation) describes the measures that would be implemented to minimize or avoid disturbance.
13003-6	Lynden Osborne	Another cause for soils within the Lava Ridge wind farm to be dryer would be ground disturbance associated with scraping, digging and pushing dirt around to build the 486 mites of new road, the 400 tower bases, the 56 miles of powerline trench, the waterlines, fences, staging areas, and maintenance facilities. Once the ground is disturbed to the extent described in the DEIS, and vegetation is uprooted, I believe that it will be virtually impossible to rehabilitate the affected desert. Anything that leads to bare ground being left unattended, will allow opportunistic weeds to become established.	Effects to soils from ground disturbance associated with work areas and infrastructure are disclosed in EIS Section 3.13.1.2 (Soils, Impacts) and summarized in Table 3.13-4 in this section. This section also describes the measures that would be implemented to minimize or avoid impacts to soils, including interim reclamation of work areas following construction; a complete list is provided in EIS Appendix 4 (Mitigation). Additional details can be found in in the Reclamation Plan (Appendix E in MVE [2023]) and the Noxious Weed Management Plan (Appendix R in MVE [2023]). Irreversible and irretrievable impacts to soils, including disturbance in very fragile soils and loss of biological soil crusts are disclosed in EIS Section 3.13.1.4 (Soils, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity). Reclamation mitigation measures would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P in EIS Appendix 4). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria. Additional details are in the Reclamation Plan (Appendix E in MVE [2023]).
22-1	Patricia Higgins	Site preparation with vegetation removal and "treatment" with fences what kind of treatment ?	The EIS does not describe any “treatments” with fencing. Table 2.4-1 in EIS Section 2.4 (Alternative B [Proposed Action]) summarizes project components by action alternative, including ground disturbance from work areas and infrastructure and miles of temporary livestock fencing. Site preparation methods and temporary livestock fencing are described in greater detail in EIS Appendix 11 (Project Elements Common to All Action Alternatives) and the Grazing Coordination Plan (Appendix S in MVE [2023]).
3140-5	Susan Page	What plants will be destroyed? What habitats will be destroyed belonging to owls just to name one.	EIS Section 3.15 (Vegetation) discusses the potential impacts to native upland vegetation and BLM special-status plants. Also see AIB-41 through AIB-44 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). Impacts to wildlife habitat, including habitat for owls and other avian species, are also described in Table App3-1 (see AIB-1, AIB-57, AIB-58, AIB-60, AIB-61, AIB-62, and AIB-63).
3251-1	Michael Ottley	Cassia County Noxious Weed Control does not support or oppose the Lave Ridge project. We are concerned with the impact the Lava Ridge Windmill Project will have on the introduction and establishment of noxious and invasive weeds. We understand the project is nearly 200,000 acres in size and will have roughly 600 miles of roads. This will create a lot of disturbed ground which is an ideal environment for the introduction and establishment of noxious and invasive weeds. We think this project needs a detailed plan of action for noxious and invasive weed control to so noxious and invasive weeds do not become established in the area. The plan should include the actions below. The most important part of the plan needs to be prevention. This involves making sure all vehicles and construction equipment are clean when they arrive at the site. Washing and removing all dirt and debris that may contain weed seeds should be done at their previous construction site. This is like what firefighting crews do before moving to a new fire. The second part of the plan should be revegetation of disturbed constriction sites and roadsides with desirable grasses so there is no bare ground for noxious and invasive weeds to get a foothold to become established. Monitoring the whole area must be done to detect noxious and invasive weeds as early as possible and before they become established in large areas. Monitoring must be done throughout the growing season to find new plants in the area so they can be controlled before they become established. Control measures like mechanical control, or herbicides, need to be done on a regular, timely basis to prevent noxious and invasive weeds from going to seed and spreading throughout the project. Failure to implement any of these will most likely result in the establishment and spread of noxious and invasive weeds throughout the project. The weeds will also spread to neighboring areas of the project, and neighboring Counties. Once noxious and invasive weeds become established it is harder to get them under control and will cost a lot more money to control them. We would also like to see the Noxious Weed Superintendents from the Counties near the project involved in making and implementing the weed control plan. These are local people with the knowledge of what weeds to be on the lookout for, and the best way to prevent noxious and invasive weeds from becoming established in the project area. We understand that green energy projects like Lava Ridge are going to happen as we move to using more renewable energy. But areas where these projects are built MUST be protected from noxious and invasive weeds, and MUST have a complete plan for the prevention, monitoring, and control of the noxious and invasive weeds that could become established in the project area, and then move to surrounding areas and Counties. Michael T. Ottley Cassia County Noxious Weed & Invasive Species Superintendent	EIS Section 3.15.1 (Native Upland Vegetation Communities) discloses the potential for ground disturbance and other project activities to introduce or spread weeds and other invasive plants; a complete list of the measures that would be implemented to minimize or avoid these effects is in EIS Appendix 4 (Mitigation). The Noxious Weed Management Plan (Appendix R in MVE [2023]) describes ISDA rules governing noxious weeds and the measures that would be implemented to identify, monitor, and treat noxious weed populations throughout the life of the project. EIS Appendix 4 (Mitigation) includes a complete list of mitigation measures that would be implemented to minimize or avoid impacts related to nonnative plant species, including additional measure ooo, which states, “MVE would be responsible for control of weed and nonnative species that result from construction, use, or maintenance authorized in their ROW grant. MVE must coordinate with the Authorized Officer and/or local authorities for acceptable weed control measures (within limits imposed in the grant stipulations) prior to implementing weed treatments.” The BLM appreciates the Noxious Weed Superintendents’ interest in this project and looks forward to further discussion about how counties’ Noxious Weed Control Programs can most effectively be involved in the planning process and coordinating weed control efforts. Other preventative measures include inspection and cleaning of equipment, machinery, and vehicles prior to entry to the project (applicant-committed measures 104 and 105, and additional measure nnn); minimizing travel through areas infested with noxious weeds (applicant-committed measure 106); and discouraging weed establishment at project-related storage and staging yards through regular site inspections and [BLM-approved] herbicide applications (applicant-committed measure 107). As described in EIS Section 2.3.2.1 (Work Area Disturbance), temporary work areas needed for construction would receive interim reclamation following construction; interim reclamation measures are described in in the Reclamation Plan (Appendix E in MVE [2023]). As described in the Reclamation Plan, reseeding will use BLM-approved seed mixes; additional details on seed mixes are provided in the Noxious Weed Management Plan (Appendix R in MVE [2023]). The Noxious Weed Management Plan describes the monitoring and control measures that would be implemented throughout the life of the project.

Comment ID	Commenter	Public Comment	Response to Comment
3725-4	Jerry Ball	When sagebrush and native grasses are disturbed and/or destroyed by the Lava Ridge Wind Project and LS Energy, it will never be the same. The disturbed sagebrush by LS Energy during construction of roads and wind turbine imprints will overcome the landscape with weeds throughout the impact area and blow onto the surrounding lands devastating the landscape. We farm by BLM ground in Minidoka County Idaho. In 2021 a high voltage transmission line was upgraded. Poles were removed and new structures installed. This disrupted the landscape damaging sagebrush and native grasses under the lines. It will take many years before the landscape will be back to where it was before construction. This was just a small project compared to the Lava Ridge Wind Project proposal of over 70,000 acres. Construction of roads, transmission lines and wind turbine footprints, will compromise the landscape. Weed seeds present with no competition from native species in the native habitat will overcome the landscape throughout the impact area and blow onto surrounding lands.	The nature of high mountain desert vegetation communities were considered when describing the duration of impacts to vegetation, which are stated to be the life of the project (34 years) plus 50 years for reclamation (the longest estimated time for native vegetation communities to re-establish): a total of 84 years, as described in EIS Section 3.15.1 (Native Upland Vegetation Communities). Measures would be implemented to ensure successful reclamation of disturbed areas, including monitoring of reclamation until desired plant communities are restored (applicant-committed measure 163 and BLM-required mitigation measure P in EIS Appendix 4 [Mitigation]). MVE would be required to purchase a reclamation bond and would be held to BLM-approved reclamation success criteria. Additional details are in the Reclamation Plan (Appendix E in MVE [2023]). EIS Section 3.13.1.1 (Soils, Affected Environment) describes very fragile soils in the siting corridors. As stated throughout the resource analysis sections in Chapter 3 (Affected Environment and Impacts), highly fragile soils naturally have relatively little vegetative cover, and are unlikely to be successfully restored and would remain permanently disturbed following the project. EIS Appendix 4 (Mitigation) describes the measures that would be implemented to minimize or avoid disturbance. Discussion of the potential impacts of weeds and other invasive plants on native upland vegetation and revegetation success is provided in AIB-41 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1. Both EIS Section 3.15.1 (Native Upland Vegetation Communities) and Table App3-1 describe the measures that would be implemented to minimize or avoid impacts related to weeds and other invasive plants; a complete list is provided in EIS Appendix 4. Additional details are in the Noxious Weed Management Plan (Appendix R in MVE [2023]).
5331-6	Joan Hurlock	The LRWP will be situated on Bureau of Land Management ground. This is PUBLIC land. According to their mission statement, the BLM is “to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations”. The addition of almost 500 miles of roads will result in thousands of acres of ground disturbance and will increase the spread and occurrence of invasive weed species. To mitigate this, LS Power will utilize BLM-approved herbicides. These can include products like Roundup and 2,4-D amine. Don’t get me wrong – I love to use the stuff in my own yard. But how will the use of these chemicals on tens of thousands of acres, for 34 years (the lifespan of the project), sustain the health of public lands and the health of the public that utilizes the same land for enjoyment and recreational purposes?	AIB-58 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1, describes impacts to wildlife from herbicide use. The EIS tiers to the 2007 and 2017 BLM programmatic EISs (BLM 2007, 2016) regarding vegetation treatments using herbicides, which disclose the effects of BLM-approved herbicides on human health and safety. See EIS Appendix 4 (Mitigation) for a complete list of measures that would be implemented to minimize or avoid impacts related to herbicide use, which include required use of BLM-approved herbicides and BLM-approval of all planned herbicide applications throughout the life of the project.
5896-1	Mike Tylka	Additionally all ground disturbance throughout the area will result in wind transport of invasive species of weeds.	Discussion of the potential impacts of weeds and other invasive plants on native upland vegetation and revegetation success is provided in AIB-41 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1). Both EIS Section 3.15.1 (Native Upland Vegetation Communities) and Table App3-1 describe the measures that would be implemented to minimize or avoid impacts related to weeds and other invasive plants; a complete list is provided in EIS Appendix 4 (Mitigation). Additional details are in the Noxious Weed Management Plan (Appendix R in MVE [2023]).
6903-9	Todd Wells	The closure of these grazing lands for the project development will allow the overgrowth of noxious and invasive weeds. While chemical control may be considered in an attempt to control weed populations, the successful control of these weed species in this scenario is not proven. Additionally, chemical residues should remain a concern for grazing animals.	EIS Section 3.9 (Livestock Grazing) discusses potential impacts to livestock grazing; none of the alternatives include closure of grazing lands. As described in this section, portions of some allotments would be temporarily unavailable during construction and decommissioning; these short-term impacts are summarized in EIS Table 3.9-3 and EIS Table 3.9-4. Areas occupied by project infrastructure would be unavailable for grazing during project operations and final reclamation as summarized in EIS Table 3.9-5 and EIS Table 3.9-6. No more than 1.3% of any allotment would be unavailable during operations and reclamation under any of the action alternatives. In coordination with BLM and affected grazing permit holders, MVE has developed the Grazing Coordination Plan (Appendix S in MVE [2023]) that would be implemented throughout the life of the project to minimize or avoid impacts to livestock grazing operations. Additional avoidance and minimization measures are listed in EIS Appendix 4 (Mitigation). EIS Appendix 4 also describes the measures that would be implemented to minimize or avoid impacts related to weeds and other invasive plants, including implementation of the Noxious Weed Management Plan (Appendix R in MVE [2023]). As described under AIB-41 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1, with the implementation of these measures the potential for the project to introduce or spread invasive plants would be low. Impacts to livestock from the use of BLM-approved herbicides are disclosed in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) and do not need to be reanalyzed.
7321-5	Travis Wells	Compaction from the construction equipment will hinder new vegetative growth. New vegetation would probably be cheatgrass and not native grasses and brushes.	EIS Section 3.15.1 (Native Upland Vegetation Communities) describes potential impacts to native upland vegetation; soil compaction is discussed further in EIS Section 3.13 (Soils). Impacts related to the introduction and spread of weeds and other invasive plants are described under AIB-41 and AIB-57 in EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1. As described in these sections, a number of measures would be implemented to minimize or avoid impacts related to weeds and other invasive plants; a complete list is provided in EIS Appendix 4 (Mitigation). Additional details can be found in the Noxious Weed Management Plan (Appendix R in MVE [2023]).
7334-3	Terry Ruby	Third, coming from my professional experiences as a Noxious Weed Control Superintendent in the proposed area, any construction brings the opening of ground to the infestation of Invasive Plant Species. The control of these species is the responsibility of the landowner. My experience with the Bureau of Land Management and their weed control efforts has been a good one, don't get me wrong here, these people work their tails off with never enough resources to do the job correctly. I for see the problem with invasive species in this area being way out of control. That being said, the lease holders for grazing in this area will have to drastically cut their numbers do to the unpalatable plant species that will certainly be growing there.	EIS Section 3.9 (Livestock Grazing) discusses potential impacts to livestock grazing. EIS Appendix 4 (Mitigation) describes the measures that would be implemented to minimize or avoid impacts related to weeds and other invasive plants, including implementation of the Noxious Weed Management Plan (Appendix R in MVE [2023]). With the implementation of these measures, the potential for the project to introduce or spread invasive plants would be low (see AIB-41 in EIS Appendix 3, Table App3-1).

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7743-1	Joan Hurlock	According to the DEIS regarding the Lava Ridge Wind Project, up to 9,114 acres of ground would be disturbed with the construction of 486 miles of roads, concrete foundations for wind turbines, substations, operation and maintenance facilities, battery storage warehouse, MET towers and up to 56 miles of underground collector lines. This ground disturbance will result in loss of native vegetation, and increase the growth of invasive weeds. To mitigate this, Magic Valley Energy will control weed growth utilizing a variety of methods, including applying BLM-approved herbicides. The list of recommended herbicides can be found in Appendix R - Noxious Weed Management Plan, Table 2. Noxious Weed Species… and Herbicide Treatments, page R-8. The named herbicides include: Telar, Milestone, Curtail, Tordon 22K, and glyphosate. The following lists the concerns with each herbicide: Telar (chlorsulfuron) – highly toxic to aquatic life, acts as both a pesticide and an herbicide, can cause respiratory distress and urea compound poisoning. Milestone (amino pyralid) – can enter the food chain via manure, and is a concern for vegetable growers. It affects potatoes, tomatoes and beans, resulting in deformed plants and poor yields. Curtail (clopyralid)- persists in dead plants and compost and is damaging to peas, tomatoes, and sunflowers; renders potatoes, spinach and lettuce inedible; has been de-registered for use on domestic lawns and has been banned in several states. Tordon 22K (picloram potassium)- does not adhere to soil and may leach into groundwater, where grazing occurs on picloram treated hay; dung from grazing animals has broadleaf killing potency; picloram was combined with other herbicides to make Agent White and was used to enhance Agent Orange during the Vietnam War. Dicamba – the sale and use of this is now illegal due to the harmful effects on crops – it can cause damage to and affect the yields of non-target crops; has been linked to cancer and harms wildlife; significant leaching into ground water is possible. Glyphosate – has been linked to cancer, liver disease, and infertility; fatal to most all vegetation. How does the use of these herbicides accomplish the BLM's mission "to sustain health, diversity, and productivity of public lands for the use and enjoyment of present and future generations"? These products can be detrimental to vegetation, crops, wildlife, humans, and water quality. How does the use of these herbicides sustain the health of BLM land and surrounding private property? How can the lands continue to be used for the enjoyment of people who are adverse to the use of herbicides, due to medical sensitivities to chemicals? How does the use of these herbicides contribute to the health of wildlife that consume treated vegetation? Located in and around the proposed Lava Ridge site are several organic dairies – Sunrise Organic Dairy, Horizon Organic Dairy, and Hidden Valley Organic Dairy. How will the use of these herbicides affect their organic status? How will MVE mitigate the dairies' financial losses in the event their dairies become contaminated and they lose their organic classification? Also located within the proposed Lava Ridge site are many small reservoirs: Hope, Hidden, Rabbit Lake, Pintail, Corral, Tumbleweed. There are also several small lakes: Sid Lake, #1 and #2, Sand, Duck, Mallard, Zero, Star and New Years. Several of the BLM-approved herbicides have been known to leach into groundwater. How will MVE mitigate the contamination of these bodies of water? The construction of new roads, support buildings and structures, and turbine platforms will increase the growth of invasive weed species and thus increase the use of herbicides to treat the disturbed areas of ground. The potential for contamination of surrounding crop land, dairies, bodies of water, and the potential health hazards associated with these chemicals is too great a risk to take.	EIS Appendix 3 (Issues Analyzed in Brief), Table App3-1, AIB-58 states, "MVE would comply with the applicable federal and state laws and regulations concerning the use of herbicides and other similar substances in all activities/operations, including the standard operating procedures described in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) (applicant-committed measure 101 and BLM-required measure Z). Prior to the use of herbicides, MVE would obtain from the BLM a written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary. Herbicides would not be permanently stored on public lands, and applicator(s) would hold a current applicator's license or be under the direct supervision of a licensed applicator. MVE would provide an annual report to the BLM to report type and quantities of herbicides applied to public lands." Impacts from the use of BLM-approved herbicides are disclosed in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) and do not need to be reanalyzed.
8631-2	Julie Stadtherr	The preferred Alternative B will have soil disturbances to 9114 acres. According to the EIS some soil areas may be impacted up to 125 years and very fragile areas will never recover. The area adjacent to the concrete turbine foundations will be permanently damaged. The removal of sagebrush and other vegetation in deserts have negative impacts on the ecosystem. These impacts include loss of biodiversity, changes in soil structure and hydrology, and increased vulnerability to invasive species. Sagebrush and other vegetation play an important role in supporting desert biodiversity. By removing these plants, you can eliminate important habitat for many species of animals and insects. This can lead to declines in population sizes and even extinction for some species. Plants play a crucial role in maintaining soil structure and preventing erosion. The removal of vegetation can lead to changes in soil structure and a reduction in soil stability, which can make it more difficult for other plants to establish and survive. Without the vegetation will this soil just blow away? Additionally, plants play an important role in retaining moisture in the soil, which can impact local hydrology. This area is over the Snake River Plain aquifer. The removal of vegetation can create opportunities for invasive plant species to establish themselves. These invasive species can outcompete native species and change the composition of the desert ecosystem. This can further reduce biodiversity and lead to a decline in the overall health of the desert ecosystem.	As described in EIS Section 3.15.1.1 (Native Upland Vegetation Communities, Affected Environment), vegetation in the siting corridors has been heavily influenced by past events that have led to the introduction and spread of nonnative plants, particularly winter annual grasses such as cheatgrass and crested wheatgrass. Additional details on sagebrush communities in the siting corridors are provided in Section 3.3.4.1.1 (Sage-Grouse Habitat); sagebrush cover in the siting corridors is depicted in Figure 3.3-8. Disturbance in areas with > 10% sagebrush cover for each alternative is summarized in Table 3.3-25. The measures that would be implemented to minimize or avoid impacts to greater sage-grouse (see Section 3.3.4.2 [Greater Sage-Grouse, Impacts] and EIS Appendix 4 [Mitigation]) would also reduce impacts to sagebrush communities because the greatest concentration of sagebrush vegetation in the siting corridors coincides with areas occupied by greater sage-grouse. This would also reduce the effects to other species are that are highly dependent on sagebrush vegetation, such as pygmy rabbit (see EIS Section 3.18.4 [Pygmy Rabbit]). Impacts to soils, including altered soil structure and decreased stability, are disclosed in Section 3.13.1.2 (Soils, Impacts). As described in this section, a number of measures would be implemented to minimize or avoid impacts to soils; a complete list is provided in EIS Appendix 4. These measures include interim reclamation in work areas that would help restore soil structure and function, re-establish native vegetation, and control weeds and other invasive plants; additional details are in the Reclamation Plan (Appendix E in MVE [2023]) and the Noxious Weed Management Plan (Appendix R in MVE [2023]). As described under AIB-41, EIS Appendix 3, Table App3-1, with the implementation of these measures, the potential for the project to introduce or spread invasive plants would be low. Impacts to the ESPA are discussed in EIS Section 3.17.1 (Groundwater Quantity). As described in EIS Section 3.17.1.1 (Groundwater Quantity, Affected Environment), the ESPA covers an area of approximately 10,800 square miles and recharging groundwater recharge in the ESPA "occurs via multiple resources including annual precipitation and tributary basin underflow. Irrigation water infiltration provides the largest source of aquifer recharge, resulting in approximately 60% of total recharge to the ESPA (USNRC 2006)." None of the alternatives would impact tributary basin underflow or irrigation water infiltration, and the greatest amount of ground disturbance under any action alternative would be approximately 9,114 acres (14.24 square miles) or 0.1% of the ESPA. While there would be permanent impacts to soils in the infrastructure area, most impacts to soils in work areas would be short term since interim reclamation would be implemented in work areas following

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			disturbance, which would include measures to decompact soils as described in the Reclamation Plan. Therefore, it is unlikely that any of the action alternatives would have a measurable impact on recharge of the ESPA.

Visual Resources

Table A-3y. Visual Resources

Comment ID	Commenter	Public Comment	Response to Comment
11201-1	Name Not Provided	This wind project will not only harm agriculture land and take away hunting for locals it will also stunt Idahos beauty.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
11210-5	Sheldon Ramsay	Furthermore, you have a visual impact which is completely incompatible with the natural environment of the region.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
11353-1	Don Wind, Dave Price; Oregon-California Trails Association	Page ES-xiii, Alternative E (Reduced Southern Corridors) Page 3-185, Section 3.5.6.2.5, Alternative E (Reduced Southern Corridors) The Oregon-California Trails Association (OCTA) is concerned about the visual impacts to the Oregon Trail located south and southwest of the project area proposed by Magic Valley Energy (MVE). The project generates adverse effects to the viewshed from the Trail during the day and at night. The experience of current and future generations of recreational visitors, students, educators and historians visiting the Trail will be adversely affected by the sight of rotating wind turbines above the northern horizon. Clearly, these adverse effects will harm the aesthetics of the Trail that visitors expect. If the project application is approved by the BLM, OCTA would favor the least intrusive option, Alternative E. This alternative would reduce southern corridors and place the closest wind turbines the furthest distance from the Oregon Trail, thereby reducing adverse visual effects.	KOP 4, Milner Historic Recreation Area base photography and simulations were taken on the Oregon Trail just south (9.4 miles) of the project. Visual impacts resulting from the development of the project at that location were assessed as minor for all alternatives (see Section 3.16.1.1.2 [Key Observation Points] in EIS Appendix 9). KOP selection was coordinated closely with the BLM and NPS for selection of areas, including the Oregon Trail, to represent sensitive viewing locations and areas within the analysis area. See Section 3.16 for disclosure of potential visual resources impacts from the project.
11353-3	Don Wind, Dave Price; Oregon-California Trails Association	Page 3-422, Section 3.16.2, Night Skies Page App4-4, Table App4-2c, Applicant-Committed Measures – Visual Resources, Lighting, and EMF Page App11-13, Project Lighting All action alternatives suffer from overall degradation of the high-quality viewing of the night skies in the area. Effects from project lighting will be observed throughout the entire region, far beyond the boundary of the currently defined project APE. This will definitely detract from the overall setting and feeling of the Oregon Trail in southern Idaho, negatively impacting the visitor experience along the Trail and at the various camping sites located on or near the Trail itself. OCTA fully supports the applicant-committed measures that have been proposed to address this issue, and deems them to be critical to the final approval of the project. MVE needs to do everything possible to minimize the impact to the viewing of the night skies throughout the area. One of these measures, the Aircraft Detection Lighting System (ADLS), is of particular importance as this one measure alone is expected to reduce the adverse effect to the night skies by almost 90%. If the project application is approved by the BLM, minimizing the light emissions from the turbine lights, as well as all other light sources within the project infrastructure, should remain a high priority for the construction and operation of this facility.	This applicant-committed measure would be applied to all action alternatives.
11411-5	Rayma Cates	There are times of the year when my house gets flickering light from the windmills.	Section 3.16.2 (Night Skies) of the EIS provides analysis of potential impacts from turbine operation to night skies, including use of the ADLS to reduce night sky impacts. Section 3.16.3 (Shadow Flicker) provides analysis of potential shadow flicker impacts to residences surrounding the action alternatives.
11423-4	Barbara Martien	The project impact on the visual appearance is not realistically protraited.	Visual simulations for the project were developed using the methodology described in Section 5.2 (Visual Simulations and Contrast Rating Analysis) in the project visual resources technical report (SWCA 2024). A digital rendering of project components were superimposed on the KOP baseline photographs of each location to illustrate a simulated representation of how the project may appear based on conditions observed during the documentation of the baseline photography. The created simulations cannot account for all situations that may influence an observer's view (i.e., influences include atmospheric, seasonal, and lighting conditions). The most common turbine color (light gray) was used for these simulations, as noted by the FAA. After the creation of simulations, visual impacts were then measured using the baseline photography as existing conditions, the simulated conditions, and contrast rating methodology as laid out by the BLM.
11454-2	Andrew Abo	I reviewed the visual simulations of the different alternatives. It was pointed out that the transmission lines were not included in the simulations. Furthermore there are significant video compression artifacts that make the turbines pop in and out even on a 30 inch monitor making it difficult to get a true sense of the visual impact. Thus, I think we should err on the side that the visual impact will be somewhat worse than presented.	The 500-kV transmission lines are proposed to be co-located in an existing transmission line corridor; see Figure 3.16-1 in EIS Section 3.16.1.1 (Landscape Character and Scenic Quality, Affected Environment), which contains existing transmission components and access roads. Although the new transmission structures would introduce additional visual impacts, it is lessened by the existing structures in the corridor. The primary cause of visual impacts from project components would occur from the wind turbines, and the transmission lines would be visually subordinate; see Section 3.16.1.2.2 (Alternative B [Proposed Action]). The dynamic simulations were provided for informational purposes only and may vary based on accuracy and resolution, which may vary based on computer and monitor settings. The visual impacts for the project were not calculated based on the dynamic simulations but rather the single-frame simulations contained in EIS Appendix 5 (Select Visual Resource Simulations) in the EIS and Appendix C in the project visual resources technical report (SWCA 2024). Due to the high sensitivity of the landscape to change, individuals viewing the simulations

Comment ID	Commenter	Public Comment	Response to Comment
			may perceive them as understating the actual in-person impacts. The simulations have been developed as a tool to capture the impact of the project at a specific moment in time to help understand the potential impacts of the project.
11458-5	Kathy McKenzie, Bret McKenzie	Scenic visual affects--the computer " simulations" of the visual effects were & are faulty--one can look at any of the existing winds farms in the area at different times/hours of the day and see that in real time/real life the visual disturbance of view is disturbing no matter what time of day or season it	Visual simulations for the project were developed using the methodology described in Section 5.2 (Visual Simulations and Contrast Rating Analysis) in the project visual resources technical report (SWCA 2024). A digital rendering of project components was superimposed on the KOP baseline photographs of each location to illustrate a simulated representation of how the project may appear based on conditions observed during the documentation of the baseline photography. The most common turbine color (light gray) was used for these simulations, as noted by the FAA. The created simulations cannot account for all situations that may influence an observer's view (i.e., atmospheric, seasonal and lighting conditions). Due to the high sensitivity of the landscape to change, individuals viewing the simulations may perceive them as understating the actual in-person impacts. The simulations have been developed as a tool to capture the impact of the project at a specific moment in time to help understand the potential impacts of the project.
11458-8	Kathy McKenzie, Bret McKenzie	The Perrine Bridge in Twin Falls is 486 feet above the Snake River--These never before used Turbines average 64 to 264 feet higher than that bridge--BLM, how many of you have stood on that bridge and looked down then up?	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
11525-3	Erin Schmith	The table also characterizes the degree of visual changed proposed by Alternatives C-E as moderate. I don't agree with that characterization, and even a "Moderate" degree of visual change fails to protect the integrity of Minidoka NHS.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS; this analysis found that all action alternatives would result in a major impact to the NPS' ability to implement its interpretive purpose at Minidoka NHS. The methodology to calculate the degree of change for all alternatives follows the BLM's contrast rating process detailed in BLM Manual Section 8431. This process assesses the contrast introduced by the project on the existing conditions of the landscape. This process was followed for each proposed alternative. Each alternative is affected differently by the distance to the nearest visible turbine, topography, existing vegetation and existing structures. BLM contrast rating sheets were prepared for each alternative at each KOP incorporating environmental factors (atmospheric conditions, topography, and existing vegetation structures) and supporting photographic simulations. Each alternative is affected differently at each KOP. For further detail on this process, see Section 5.2 (Visual Simulations and Contrast Rating Analysis) in the project visual resources technical report (SWCA 2024).
11535-147	Steven Andersen	As presented, the visual assessment is inadequate to account for the visual impacts of the wind turbines and associated infrastructure and must be amended to accurately assess adverse impacts and to determine appropriate avoidance or mitigation measures from additional vantage points. Those vantage points should include all historic districts, and all properties listed or eligible for listing, in the National Register, and any National Historic Landmarks. Vantage points for revised simulations should include key recreation sites including the Seattle Ridge, Sun Valley ski resort and key recreational sites around Seattle Ridge recreational mountains used by skiers.	KOPs were chosen to represent specific places, areas and features that have visual importance relative to one's home, social, business, and recreation environment. This includes where the public would view the project from both a stationary (e.g., residential areas) and or a linear (e.g., major roadway) locations. The KOPs chosen for this project were chosen with coordination with the BLM SFO and cooperating agencies. Project mitigation for impacts is outlined in EIS Appendix 4 (Mitigation).
11535-148	Steven Andersen	The Department of Interior supported a study by Argonne National Laboratory into the visual impacts of utility-scale wind facilities in the western United States.429 The turbines were found to be visible to the unaided eye at 36 miles with turbine blade movement visible at 24 miles.430 They were judged to be major foci of visual attention up to 12 miles. The study suggests that an appropriate radius for visual impact analyses is up to 30 miles. Of note, the study provides that turbines may reach a height of 400 feet, whereas the project is proposing turbines nearly double that height. Here, the locations of the turbines is not known and so it is impossible to even model observation points, viewpoint elevation, lighting conditions (angle of the sun and viewing angle) and other situational variables, which are all critical factors when assessing visual impacts of turbines. It doesn't appear the BLM relies on the same visual assessment modeling used in the Argonne study, and without explanation. However, using this methodology, it is clear the turbines will be a source of significant visual contrast.	The methodology for the visual analysis was reviewed and is comparable to the methodology used for other recent BLM wind turbine projects within the western United States. For clarity and continuity with the Visual and Cultural Resources EIS sections, the impact findings using the BLM Contrast Rating methodology was crosswalked with the Argonne Visibility Level Rating methodology and is contained in a new appendix in the project visual resources technical report (SWCA 2024).
11535-149	Steven Andersen	When assessing the visual resource contrast rating, the BLM should have designated interim Visual Resource Management classes, since none are designated in the Monument RMP, in order to guide its actions, including mitigation.	See Section 3.16.1 (Landscape Character and Scenic Quality). BLM (1986b) did not establish VRM classes. The BLM and NPS (2007) established VRM classes for Craters of the Moon National Monument; however, these class management objectives are not applicable to the project because installation of project components would not occur on Craters of the Moon National Monument. The BLM determined and added project-specific interim VRM classes and objectives to the final EIS, please see Section 3.16.1.
11535-150	Steven Andersen	Further, the sensitivity level analysis for the SLRUs in the DEIS fails to account for several factors including the deep levels of sensitivity associated with the area (beyond a common "higher sensitivity" rating) and the inability to estimate the visual disturbance of structures on a scale never constructed.	The components used by the BLM to assess the inherent value of the existing landscape are combined into the Visual Resource Inventory (VRI) process. This process includes Scenic Quality (visual appeal of the landscape), Sensitivity Level (accounting for the attitudes and perceptions held by people regarding the landscape and the public's sensitivity for noticeable change in the environment) and Distance Zones (areas where the project may be visible from high traffic areas like major roadways). These components combine to an overall VRI class. These components are summarized in EIS Section 3.16.1.1 (Landscape Character and Scenic Quality, Affected Environment) of the visual resources section of the EIS and in further detail in Section 4.1 (Visual Resource Inventory and Values) in the project visual resources technical report (SWCA 2024).

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11535-152	Steven Andersen	The EIS needs to address how the project will address lightning impacts, including during the construction phase. The agency should consider visual impacts of lightning at each proposed turbine's base and reflections that impact aviation.	Construction lighting (which would be temporary) is discussed in EIS Section 3.16.2.2.2 (Alternative B [Proposed Action]), and the impacts were assessed to remain at a similar level to the current conditions of scattered light from nearby towns. Lighting impacts to night skies is discussed in the EIS in Section 3.16.2 (Night Skies). No lighting would be located at the base of the turbines and mitigation for lighting for the turbines and any other facilities is detailed in EIS Appendix 4 (Mitigation).
11551-1	Erin Shigaki	The DEIS contradicts its finding of harm by stating that Alternatives C and E would only provoke a "moderate" visual change. I am aware that you did not use the maximum height wind turbines (6mw at 740 feet tall) in your various Key Observation Point images. I find this disturbing and misleading. I know from creating my own basic visualizations, that the large turbines are taller than Seattle buildings such as the Space Needle and the Smith Tower, and that the largest proposed Alternative would create a footprint larger than the entire City of Seattle. I understand what walls of wind turbines at this scale will do to the viewshed and one's experience on the Minidoka NHS. A project of this magnitude cannot but harm the viewshed, immersive educational experience, and what NPS has done to create a monument that provokes a feeling and association of the historic events that happened there. I cannot agree then with the BLM's findings that Alternative C and E would incur only a "moderate" degree of visual change to Minidoka NHS's viewshed.	See response to comment 11458-5 (see in Table A-3y, Visual Resources) for details on simulation creation. Some KOPs offered similar views of the project across project alternatives; therefore, simulations were only created for one of them. Select simulations are contained in EIS Appendix 5 (Select Visual Resource Simulations) and in Appendix C in the project visual resources technical report (SWCA 2024). Impact determinations are consistent with our impact criteria table in both the EIS and project visual resources technical report (SWCA 2024) in Table 3.16-2.
11557-5	Deanna Weigel, Andy Weigel	One last comment on visual resources, KOPs discussed in the survey show major impacts to visual resources. Mitigation measures such as low gloss and gray paint may alleviate the impact to the visual resources from a peripheral view at certain times of the day, but are woefully insufficient. The honest reality is that there is no true mitigation for the viewshed destruction caused by 400, 740 ft tall wind turbines.	The EIS discloses potential major impacts to visual resources in Section 3.16 (Visual Resources). All mitigation measures for the project are contained within EIS Appendix 4 (Mitigation). These mitigation measures represent the BMPs for minimizing impacts of wind turbines to date. All visual impacts are not completely avoidable because of the aboveground nature of the project but mitigation and minimization of impacts for this project would be followed as described in EIS Appendix 4.
11574-1	Jared Orton	Furthermore, the computer-generated renderings of the windmill towers do not accurately represent the visual impact that this project would have on the surrounding landscape. The visual appeal of our public land is a precious resource that should not be taken for granted. I urge the BLM to take into consideration the impact that windmill development would have on the visual appeal of the surrounding areas and the disturbance to the conservation of the public lands before approving this project.	See response to comment 11535-147.
11598-30	Idaho Conservation League	Visual simulations On the tour people were trying to visualize the impacts of the turbines from various key observation points. The technology, information and funding currently exist to provide this information to the public now via draft visual simulations from major viewpoints. These observation points would be based on a photograph and be overlaid with the wind turbine and transmission lines configuration per each alternative. The ability for users to examine alternative viewsheds (i.e. to scroll left or right for a 180-degree view of the landscape and to zoom in as desired) could be adapted to incorporate the range of alternatives. While we appreciate that the tour included Sid Butte, the fact that Sid Butte is not a Key Observation Point is unacceptable given the prominence and popularity of this viewpoint. We recommend adding this site as a Key Observation Point. We recommend that the BLM post these draft visual simulations on the BLM Lava Ridge website with the note that these may be further modified in the DEIS. If these alternatives include turbines of different heights, this should be factored in as well.	Sid Butte is included in the draft EIS as KOP 17.
11615-7	Spencer Dixon	The visual pollution on these turbines will rob the magic valley of its rural farming feel and look and turn it into a nightmare of white industrialized wasteland and ever present glowing red lights of night time pollution creating dark sky issues. I can't state this enough that the visual impact on the local residents will be great and are not taken seriously in the EIS as well as the impact it would have on the Hunt relocation camps visitors. I have been there and the project would harm the peace and tranquility that is there.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. Night skies mitigation measures, including the ADLS, are detailed in Section 3.16.2 (Night Skies) of the EIS and EIS Appendix 4 (Mitigation).
11620-3	Simone Griffin; BlueRibbon Coalition	Visual resource management also needs to be highly considered through this NEPA process according to FLPMA. The recreational and visual values with be severely depleted with the approval of the wind farm. I do not believe the BLM can approve this project and uphold their responsibilities to manage visual resources on this public land.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See Chapter 1 (Introduction) of the EIS for information on the project, its purpose and need and the decision to be made by the BLM.
11622-6	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	Visual Contrast Modeling. Rather than BLM's finding of Moderate visual change, we recommend that BLM adopt the Argonne model which better captures the impacts of visual change on user groups. Specifically, we believe that the visual impacts analysis of Alternatives C & E should find that the impacts at the Honor Roll and other Minidoka KOPs be defined as Argonne Class 5 or 6: Argonne Class 5: Strongly attracts visual attention of views in general direction of study subject, but not the most prominent or dominant feature in the view. Attention may be drawn by strong contrast in form, line, color, texture, or luminance. An object/phenomenon contrasts with the surrounding landscape elements so strongly that it is a major focus of visual attention, draws viewer attention immediately and tends to hold viewer attention, but is not prominent enough to dominate the view. In addition to strong contrasts in form, line, color, texture, and luminance (such as reflections) associated with the study subject, it may contribute substantially to drawing viewer attention. The visual prominence of the study subject interferes noticeably with views of nearby landscape elements. Argonne Class 6: Dominates view because of structure or facility size (for views in its general direction) and strong contrasts in form, line, color, texture, or luminance An object/phenomenon with strong visual contrasts that is of such large size that it is the major focus of visual attention and dominates the view. The large apparent size is a major factor in its view dominance. In addition to size, contrasts in form, line, color, and texture, bright light sources associated with the study subject	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11535-148 (see in Table A-3y, Visual Resources) for information on the Argonne Visibility Level Rating methodology.

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		may contribute substantially to drawing viewer attention. The visual prominence of the study subject detracts noticeably from views of other landscape elements.	
11625-1	John Arkoosh	I drove through the maze of roads that connects the wind towers, It was not a peaceful place to be. It was busy, not busy with people, it was busy with distractions and annoyances. Despite the best efforts of the BLM to do a thorough visual impact study, after driving to Bell Rapids that day I came to realize DEIS visual simulations are seriously deficient. I don't believe the misery of such impacts can be conveyed through a screen or on a piece of paper but seeing and hearing it firsthand and realizing what it is to come with this project is sickening me and my family. There is no mitigation that can compensate for these impacts.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11458-5 (see in Table A-3y, Visual Resources) for methodology of the creation of simulations. See response to comment 11557-5 (see in Table A-3y, Visual Resources) for information about project mitigation.
11667-10	Alisa Bowman	Concern: Qualify of life for the immediate neighbors will decline Some of the reasons people live in the area is for the solitude, views, and quality of life. With 74o foot towers with flashing red lights on top in their backyard, this impacts those that have been here their entire lives. Please protect the current residents' way of life and do not allow the greed of a corporation to ruin their lifestyle. Concern: Visual impact The 740 foot tall towers with flashing red lights dotting the landscape will forever change the wide-open public land that was set aside for all of the public to enjoy. The public would no longer be able to enjoy this land. Only a greedy corporation from out -of-state with interests in financial gain would ruin it for the residents and visitors that come to Idaho for a wild and scenic experience.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11411-5 (see in Table A-3y, Visual Resources) for details on night skies impacts.
11772-4	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	Visual Contrast Modeling. Rather than BLM's finding of Moderate visual change, we recommend that BLM adopt the Argonne model which better captures the impacts of visual change on user groups. Specifically, we believe that the visual impacts analysis of Alternatives C & E should find that the impacts at the Honor Roll and other Minidoka KOPs be defined as Argonne Class 5 or 6: Argonne Class 5: Strongly attracts visual attention of views in general direction of study subject, but not the most prominent or dominant feature in the view. Attention may be drawn by strong contrast in form, line, color, texture, or luminance. An object/phenomenon contrasts with the surrounding landscape elements so strongly that it is a major focus of visual attention, draws viewer attention immediately and tends to hold viewer attention, but is not prominent enough to dominate the view. In addition to strong contrasts in form, line, color, texture, and luminance (such as reflections) associated with the study subject, it may contribute substantially to drawing viewer attention. The visual prominence of the study subject interferes noticeably with views of nearby landscape elements. Argonne Class 6: Dominates view because of structure or facility size (for views in its general direction) and strong contrasts in form, line, color, texture, or luminance An object/phenomenon with strong visual contrasts that is of such large size that it is the major focus of visual attention and dominates the view. The large apparent size is a major factor in its view dominance. In addition to size, contrasts in form, line, color, and texture, bright light sources associated with the study subject may contribute substantially to drawing viewer attention. The visual prominence of the study subject detracts noticeably from views of other landscape elements.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11535-148 (see in Table A-3y, Visual Resources) regarding the Argonne Visibility Level Rating methodology.
11860-11	Shauna Robinson	The KOPs made to simulate the look of the wind turbines from the visitors center at Minidoka were inadequate and misleading. The simulation only shows turbines, omitting the transmission towers, wires, and connecting systems, and any sound recordings of the noise turbines would create, audible for up to 2.2 miles (3-176). The light for the daytime simulation makes the white towers hard to see, plus the wide-angle view makes the towers appear farther in the distance than they really would be in person. The turbines in the evening simulation were more noticeable, but still lacked all the associated wires, electrical towers, etc. Also, what would this scene be like at night with all the blinking red lights required for the safety of aerial traffic? The dark skies certainly would be diminished. Given the impacts on the viewsheds that would "detract noticeably" (3-177), disrupt the sense of isolation, and diminish Minidoka's historic integrity, there should be no thought whatsoever about placing wind turbines anywhere close to the site. Keeping wind turbines out of the viewsheds allows descendants of survivors and family members a unique chance to share the sense of remoteness and seclusion their relatives experienced.	See response to comment 11454-2 (see in Table A-3y, Visual Resources) for information about the transmission line structures. See responses to comments 11454-2 (see in Table A-3y, Visual Resources) and 11535-147 (see in Table A-3y, Visual Resources) for details about simulations. See response to comment 11411-5 (see in Table A-3y, Visual Resources) for details about impacts to night skies.
11964-1	Matt Bridges	BLM's mission statement is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. Located on the U.S. Department of the Interior (DOI) web site (DOI.gov) is an article titled "Twinkle Twinkle, 16 Awesome Public Lands for Star Gazing. (5, April 2023), Subtitle: "Some of the last harbors of dark skies, public lands provide unspoiled views of the stars glittering above". In this article it states: "After the sun goes down, the skies above America's public lands come alive. Some of the last harbors of dark skies, public lands provide unspoiled views of the stars glittering above. While fewer than 500 stars may be visible at night in urban areas because of light pollution, you can see up to 15,000 stars on some public lands across the country. We're working to protect these truly dark skies for visitors to enjoy." Visitors and Citizens seek sights such as these where the proposed Lava Ridge Project would impact viewsheds. Two nearby sites would be: Craters of the Moon National Monument and Preserve, and the Minidoka National Historic Site. Not included in the DEIS is a specific evaluation from The Natural Sounds and Night Skies Division of the Nation Park Service. This division supports NPS units' system wide. They provide "assistance in collecting baseline data for ambient acoustic and night sky quality, identifying source specific impacts and engineered solutions to reduce, mitigate or prevent anthropogenic noise and excessive light in and around parks and national trails." However, in the DEIS it states under 3.16.2.3 Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity Under all action alternatives, "there would be an irretrievable long-term effect from changes in brightness of the night sky at CRMO and Minidoka NHS during the 30-year operation period. These long-term effects would remain until turbines are removed from the landscape during decommissioning. Short-term effects on night skies would also occur during the 2-year construction	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. The BLM will review all components of the project and make a decision on the project as detailed in the EIS Section 1.3 (Decision to be Made). See Section 3.16.2 (Night Skies) for disclosure of potential impacts to night skies. All information regarding the project can be found as disclosed at https://eplanning.blm.gov/eplanning-ui/project/2013782/510.

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		period." A naturally dark night sky is more than a scenic canvas; it is part of a complex ecosystem that supports both natural and cultural resources. https://www.nps.gov/orgs/1050/index.htm For this reason, please select Alternative A, the No Build Option	
11978-41	Magic Valley Energy, LLC	38. The DEIS states: "For this analysis, the immediate foreground is defined as the area within 2 miles of the project components previously described, the foreground is from 2 to 10 miles, the middleground is from 10 to 20 miles, and the background is from 20 to 30 miles (Figure 3.16-3)." a. MVE Comment: The use of immediate foreground, foreground, middleground, and background visual distance zones are represented as 0-2 miles, 2-10 miles, 10-20 miles, and 20-30 miles, respectively. These visual distance zones are referenced by Sullivan et al. 2012 as applicable to wind turbines, since the visual distance zones encompass larger areas than typical to account for the scale and motion of a wind turbine. However, when looking at Figure 3.16-1, these visual distance zones were incorrectly applied to the 500-kV transmission lines. MVE requests that the FEIS be updated to use visual distance zones specific to transmission lines, which can be found in a separate Sullivan et al. 201417 report, and are defined as follows: 1. Lattice a. 500 kV: Maximum distance at which one could be seen by the unaided eye was approximately 17.2 miles (pg 24). "For this observation, only the towers were visible, skylined on the distant ridge. The towers were judged to be near the limit of visibility. They appeared tiny and would not likely be visible to a casual observer; however, in this case, the observers were scanning the landscape closely and specifically looking for transmission facilities. At this distance, only a very short vertical line contrast was visible for each tower, and thus the towers were not recognizable as transmission towers per se" (pg 25). Beyond 11 miles, they were judged to be too small and faint to be noticed by most casual observers. i. Paper suggests 12-13 mile distance be sure all facilities likely to be visible are included. 2. Monopole a. 500 kV monopole towers were observed up to 11.1 miles and may have been visible from greater distances. They were observed beyond 10 miles in two separate observations. They were judged not likely to be visible to casual observers beyond 8 miles. By updating the 500 kV line to visual distance zones used in Sullivan et al 2014, the background distance zone would decrease from 20-30 miles, to approximately 12-17 miles. Immediate foreground, foreground, middleground, would then have subsequent lower distance ranges. The non-physical Area of Potential Effect (APE) would be decreased in Alternative B, and substantially decreased in Alternatives C, D, and E, as the 500 kV transmission line becomes more isolated from the turbine corridors, which have larger impacts. Visual impacts to KOP 1, KOP 2, KOP 11, KOP 7, KOP 8, and KOP 10, may also be reduced by this change since they are closer to the 500 kV transmission line than they are to siting corridors.	The immediate foreground (0–2 miles), foreground (2–10 miles), middleground (10–20 miles), and background (20– 39 miles) visual distance zones were given the same emphasis for both the turbine corridors and the 500-kV transmission lines, which would represent a visual worst-case scenario for the transmission lines. While the 500-kV line may not be as visible as the turbines at this distance, the BLM decided to be more conservative in its analysis approach. As part of the public comment process, there has been extensive concern and consistent theme of the large, expansive views associated with this landscape. The analysis area and distances used in this approach helps to support the analysis of the large, expansive views within this landscape.
11978-42	Magic Valley Energy, LLC	Section 3.16.1.2.5 Visual Resources – Landscape Character and Scenic Quality (Alternative E) 39. The DEIS states: "Impacts to other KOPs (5, 6, 7, 8, 9, 10 (East), 11, 12 13, 14, and 15) would remain the same as Alternatives B, C and D." a. MVE Comment: This language is written under the analysis for Alternative E. However, Alternative E should have reduced impacts at all KOPS when compared to Alternative B, and reduced impacts to some KOPS when compared to Alternatives C and D. As such, MVE requests that BLM revise this statement to read: "Alternative E would have reduced impacts to KOPs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15 when compared to Alternatives B and would have reduced impacts to KOPs 1, 2, 3, 4, and 11 when compared to Alternatives C and D.	After reviewing the comment and the draft EIS, this text has been updated.
11978-43	Magic Valley Energy, LLC	40. The DEIS states in Table 3.16-5 that the degree of visual change at KOP 2 (Minidoka NHS – Block 22 Barracks) is "major" for Alternative C but "moderate" for Alternative D. a. MVE Comment: Based on MVE's review of the BLM's January 2023 Visual Resources Technical Report for the Lava Ridge Wind Project, the differences in the simulated conditions apparent for Alternatives C and D are sufficiently immaterial that it would be appropriate for BLM to revise the degree of visual change designated in Table 3.16-4 for Alternative C to match that of Alternative D, i.e., both visual change ratings would be "moderate". MVE notes that the visual impacts from Alternative C would be substantively identical to the moderate impacts of Alternative D since Alternative C includes many of the same corridors in proximity to Minidoka NHS as Alternative D, but with slightly shorter turbine corridors along the southwestern portion of the project area. Additionally, as reflected in Table 3.16-5 of the DEIS, the distance to the nearest turbine siting corridor, which is the primary determinant for the prominence of the Project features within the viewshed, is 6.5 miles for both Alternatives C and D. To the extent that the KOP 2 visual simulation for Alternative C in the January 2023 DEIS Visual Resources Technical Report may depict more turbines that are faintly visible near the horizon relative to Alternative D, MVE contends that the difference in visual prominence between the two alternatives is not discernable to most viewers and that a qualitative distinction between the two alternatives is not supported by the simulations. As previously mentioned, the DEIS also seems to support this conclusion, as these distant turbines are the sole turbines analyzed in Alternative H, which was identified as an alternative that eliminates potential visual impacts to Minidoka NHS. The negligible differences between the two simulations at KOP 2 are illustrated in Figure 1 below. MVE notes that we anticipate these same principles will apply at KOP 16 (i.e., KOP 16 degree of visual change in Table 3.16-5 is "moderate" for Alternatives C, D, and E) when KOP 16 is added to the table in the FEIS. Figure 1. Comparison Between Alternatives B and C at KOP 2 [see figure in pdf letter	After a review of the comment from MVE impact findings at KOP 2, Alternative C has been edited to moderate.
11978-44	Magic Valley Energy, LLC	Section 3.16.2.2.2 Visual Resources – Impacts to Night Skies 41. The DEIS states: "Under all five scenarios, overhead sky brightness as viewed from the selected observation point at Minidoka NHS would increase between 0.5% to 2.2%, depending on the lighting scenario, which would not be perceptible to human observers..." (excerpt from a 3- paragraph discussion of night skies impacts at Minidoka NHS). a. MVE Comment: The Minidoka NHS visitor center closes nightly during times of year when the Minidoka NHS is open,	The BLM recommends not removing Minidoka for night sky analysis because it is open year-round and is open to walking tours 24 hours a day.

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		and the grounds and trails close at sunset18. Accordingly, Project lighting impacts to night skies at the Minidoka NHS would not appear to be a relevant issue, and the related analysis should be removed from the DEIS.	
11978-138	Magic Valley Energy, LLC	40. Section 3.16.1.1.2 Visual Resources - Key Observation Points “The siting corridors are in an area of moderate sensitivity. Figure 3.16-2 illustrates the visual sensitivity ratings for the analysis area (see additional details in SWCA [2022]).” It is unclear how the sensitivity units are delineated in the DEIS. MVE recommends that Table 5 from the referenced SWCA 2022 report should be incorporated into the FEIS for clarification.	Table 5 from the project visual resources technical report (SWCA 2024) is included in the EIS as Table 3.16-2 in EIS Section 3.16.1 (Landscape Character and Scenic Quality). Sensitivity level ratings are developed following BLM policy (BLM Manual Handbook 8400 [BLM 1984]) as well as input and information from BLM staff.
11978-139	Magic Valley Energy, LLC	41. Section 3.16.1.2.2 Visual Resources - Key Observation Points “This visual change correlates to visibility level 6 with strong visual contrast that the project dominates the field of view and is a major focus of visual attention. In addition to size and contrasts in form, line, color, and texture, the movement of the turbine blades contribute substantially to drawing viewer attention.” Visibility level is not defined in the DEIS. MVE recommends listing out the differences of visibility levels for clarification.	See response to comment 11535-148 (see in Table A-3y, Visual Resources).
11978-140	Magic Valley Energy, LLC	42. Section 3.16.2 Visual Resources - Night Skies “The analysis area for night skies is the nightscapes viewed from CRMO and Minidoka NHS. The duration of effects to night skies would be the life of the project, from construction through decommissioning and reclamation (34 years).” MVE requests that the reference to reclamation removed, as lighting would only occur through decommissioning. An update could be: “The analysis area for night skies is the nightscapes viewed from CRMO and Minidoka NHS. The duration of effects to night skies would be the life of the project, from construction through decommissioning (34 years).” Also note that MVE previously commented (comment 41) about removing the Minidoka NHS night skies analysis as the site is not open after dark.	After reviewing the comment and EIS wording, the text has been updated and reclamation has been removed. The BLM recommends not removing Minidoka for night sky analysis because it is open year-round and is open to walking tours 24 hours a day.
12054-9	Kevin Emmerich	Visual Impacts: The VRM classes set VRM objectives for lands in each class, as well as the level of visual change in the landscape character that is allowed as a result of proposed management activities. The objectives and allowed levels of change for each of the four VRM classes are as follows: • VRM Class I Objective: To preserve the existing character of the landscape. Allowed Level of Change: This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention. • VRM Class II Objective: To retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. • VRM Class III Objective: To partially retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape. • VRM Class IV Objective: To provide for management activities which require major modification of the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape can be high. Management activities may dominate the view and may be the major focus of viewer attention. However, the impact of these activities should be minimized through careful siting, minimal disturbance, and repeating the basic elements of form, line, color, and texture within the existing setting. Since Visual Resources were not evaluated by the Monument RMP, the default VRM Class is VRM Class IV. This is the lowest class that encourages big developments like Lava Ridge. We feel that both the BLM and Magic Valley Energy LLC. are taking advantage of a loophole in the planning process and that is very irresponsible.	See response to comment 12538-4 (see in Table A-3y, Visual Resources).
12165-1	Jerry Holton	I noticed in the EIS Book 4 it shows the differences in the sizes of the windmills and distances. The ones that are shared in that book are not even close to being the same as in real life. I will share some pics off the page that shows from .25 miles out to 4 miles. Even in the pictures that were shared at the Lincoln Community event and over at Canyon Crest event they are not even to scale. You can not get accurate comments when the pictures that are being shown are not to scale. Even in the areas about the distances in the EIS that shows from say the Honor Roll at Minidoka camp or the barricks. They are not close to scale. I took pictures and used my GPS and Onx mapping system to get distances. I will be sharing a few of my pictures so that you can see the differences. This is very frustrating as its deceiving people from seeing the true scale and making a better-informed decision off what is being shown. [...] Here are 4 pictures. Like stated Mileage is written on the pics. Pictures are looking from Wendell area towards Bell Rapids.	See responses to comments 11458-5 (see in Table A-3y, Visual Resources) and 11535-147 (see in Table A-3y, Visual Resources).
12228-2	Jane Dyndiuk	Lastly, we will be able to see these gigantic structures from every hill top in the Wood River Valley, ruining our enjoyment of the wilderness.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
12338-2	National Park Service	Topic #2 – Discrepancies in Visual Resources Impact Conclusions Section: 3.16.1.2.3 Visual Resources Page: 3-419 Alternative C: The NPS recommends additional explanation on the writer’s determination in the draft EIS of the degree of visual change (major vs moderate) for Key Observation Point 1 (Visitor Center) and Key Observation Point 2 (Block 22) in Alternative C. • On page 3-419 in the draft EIS, visual impacts to Key Observation Point 2 (Block 22) “would be similar to Alternative B (major overall)”. This is also reflected in Table 3.16-7. However, on page 45 in the Visual Resources Technical Report, visual impacts at Key Observation Point 2 “would be reduced from major to moderate". • Key Observation Point 2 (Block 22) is listed as “major” in the degree of visual change. The draft EIS describes the difference in the degree of visual change between Key Observation Point 1 and Key Observation Point 2 as due to the focus of the viewer’s attention to the east (page 3-413). However, Key Observation Point 1 and Key Observation Point 2 are less than 0.1-mile apart and viewers	Impact ratings at KOPs 1 and 2 have been revisited and adjusted on CRWs and Table 3.16-6. See response to comment 11535-148 (see in Table A-3y, Visual Resources) for information on the Argonne Visibility Level Rating methodology.

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		at both locations experience a similar view of the surrounding landscape. • Key Observation Point 16 (Honor Roll) is 0.36- and 0.44-miles from Key Observation Point 1 and Key Observation Point 2, respectively, but is listed as “major” in the degree of visual change in the Visual Resources Technical Report. • The photo simulations provided in the draft EIS at each Key Observation Point only represent a portion of the entire view, an estimated ~ 35-40 degrees of the horizon. Panoramic simulations, however, would reveal that the full extent of the views from Key Observation Point 1 and Key Observation Point 2 are virtually the same (~71 degrees of the horizon for Alternate C) as far as the overall visibility of the project. Given the identical views of the landscape at these Key Observation Points, this would suggest that the visual impacts are also the same. • According to the 2012 BLM-commissioned Argonne National Laboratory study used to support the visual resources analysis, both Key Observation Points 1 and 2, at 5.5 and 6.5 miles, respectively, to the nearest turbine siting corridor, would be considered a “be a major focus of visual attention, tending to attract and hold visual attention because of strong contrast in form, line, texture, color, or motion”. This level is used to describe facilities occurring within 10 miles and based on observations of turbines 400 feet in height, far shorter than the proposed turbines for this project. • Impacts to Key Observation Point 1 are described as major in the narrative under Impacts for Alternative C in the Non-Physical Impacts section for Cultural Resources (Section 3.5.6.2.3).	
12338-3	National Park Service	Section: 3.16.1.2.4 and 3.16.1.2.5 Visual Resources Page: 3-419 to 3-421 Alternatives D & E: The NPS would appreciate an opportunity to discuss the draft EIS’s determination that the project would have “moderate” visual impacts under Alternatives D and E. As described in Table 3.16-5, Alternative D is located at 5.5 miles and Alternative E is located at a distance of 8.5 miles from both Minidoka Key Observation Points 1 (Visitor Center) and 2 (Block 22). Multiple turbines in both alternatives would be within the foreground distance zone for tourists and recreational users.	After reviewing the simulations and contrast ratings, the impact findings for Alternative E have been reduced to minor as compared to Alternative D, which are moderate.
12338-6	National Park Service	Section: Executive Summary Page: ES-xv to ES-xxiv, Table ES-2 The NPS recommends inclusion of night sky impacts within the visual resources section.	Impacts to night skies are summarized in Table ES-2 in the EIS Executive Summary.
12338-13	National Park Service	Section: 3.16.1.1.2 Visual Resources Page: 3-403 Summary table: To facilitate a comparison of impacts for each alternative at each Key Observation Point, we suggest including in a summary table that includes the following measures: degrees of the horizon (that turbines will be visible); miles (of the span) that turbines will be visible on the horizon from each Key Observation Point; and number of turbines visible (all or in part) from the Key Observation Point.	These additional details are now available as Appendix F of the project visual resources technical report (SWCA 2024) to facilitate the commenter’s comparison of impacts for each alternative from each KOP.
12465-2	Regina Smith	Visual impacts are commonly considered non-physical. Simulations of Minidoka and Butte Cave, show the negative visual impacts on the horizon. This same horizon will be seen by most if not all dispersed recreational activities: photography, wildlife viewing, rock hounding, winter snow activities, OHV, night sky viewing, hunting, camping, horseback riding; all these activities, except perhaps spelunking. In the case of photography, the impacts could be considered physical and irreversible. Other activities could be considered closely related, i.e. Wildlife viewing, nighttime viewing, and the remoteness for which the site of Minidoka War Relocation site was selected, would be irretrievably lost. Cumulative impacts, irreversible and irretrievable impacts are not even discussed for the dispersed recreational activities listed at the beginning of this section. The disregard for residents and tourists alike is appalling.	Additional language discussing recreational activities has been added to EIS Sections 3.16.1.1.1 (Existing and Future Trends and Actions), 3.16.1.2 (Impacts), and 3.16.1.2.7 (Cumulative Impacts).
12538-4	Clarke Kido	Comments about the BLM Visual Resource Management Process During my review of the Lava Ridge Wind draft EIS, I came upon references to the Visual Resource Management (VRM) process. · I looked at the Visual Resource Rating worksheet for KOP 1 as shown in Visual Technical Report Appendix B. At the bottom of the worksheet, the degree of contrast is marked as Strong regarding structures. The VRM sheet is checked as Long Term. I was not surprised by these ratings. · At the bottom of KOP 1 Worksheet Question 2 asks “Does the project meet visual resource management objectives?” There is entry space allotted to indicate Yes or No, but the space is left unmarked. There is a note: “Explain on reserve side.” · On the reverse side of the worksheet, the following statement is provided for Item 2: “The 1986 Monument RMP for the Shoshone Field Office does not designate VRM Class Objectives for the planning area per current BLM VRM policy.” I am puzzled by this statement. · My concern is regarding the completeness of the Visual Resource Management Process. The question 2 for meeting visual resource management objectives is left unanswered. The explanatory note merely indicates that the BLM Shoshone RMP (1986) does not provide guidance to perform such analysis. · Without a yes or no determination, coupled with the absence of VRM guidance in the BLM Shoshone RMP, my question is where is the evidence to show that the EIS requirements for VRM analysis has been completed? These VRM questions apply to other KOPs.	See response to comment 11535-149 (see in Table A-3y, Visual Resources) and comment 12538-4 (see in Table A-3y, Visual Resources) for more information. BLM visual contrast rating forms were updated to reflect project-specific interim VRM classes and conformance.
12859-32	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Alternative C & E. Impairment of the Park’s Fundamental Resources and Values. Because of the negative impacts of both Alternatives C and E, this section will comment on both Alternatives’ impairment of Minidoka’s fundamental resources and values which would violate the NPS Organic Act, NPS Policies and other authorities. In 2006, the NPS completed its GMP which NPS adopted through a record of decision (ROD) based on the GMP/Final Environmental Impact Statement. The ROD’s Selected Action provides that “[o]n site education and interpretation will be accomplished through a wide range of visitor experiences, including immersion into the historic scene, interaction with a variety of educational and interpretive media and personal services, and participation in creative and self-directed activities.”234 The final Minidoka GMP identified maintaining the park’s immersive setting, scenic vistas of the surrounding landscape, and living conditions during World War II as park	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. The project is being proposed on public lands managed by the BLM. The location of project infrastructure would be located in areas adjacent to Minidoka NHS, a site managed by the NPS, but no portion of the project would be located on lands within the jurisdiction of the NPS. The NPS is a cooperating agency, and the BLM has worked with the NPS closely to ensure the EIS evaluates potential impacts to NPS units and associated resources. The NPS is also participating as a consulting party within the Section 106 process and has actively

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		priorities:235 • Desired future conditions and goals for adjacent lands: “[t]he vastness, isolation, and open character of site’s desert environment that existed during the historic period are maintained through collaborative partnerships and cooperative efforts with surrounding landowners and others.” • Scenic Resource Management goals: o “Scenic viewing areas and interpretive overlooks along the northern boundary of the site and within the east end site will be developed to provide panoramic views of the physical extent of the historic residential areas.” o “[t]he NPS will collaborate with neighboring landowners to assist in the protection of historically significant distant views to the surrounding areas.” • Education and interpretation will be accomplished “through immersion into the historic scene,” and “[t]he use of historically accurate buildings, features, and their site context will provide visitors with an opportunity to experience a high level of interest in living conditions associated with the historic period.” • Contemplative setting and sense of openness: “[t]he historic open space will provide a contemplative setting with restored historic pathways and the historic perimeter fence, along with interpretive trails and waysides that will allow for self-guided exploration. The historic open space will provide a sense of openness that was apparent during the historic period.” • Interpretative themes: o “The setting and location of Minidoka, with its isolation, openness, and distance from the Pacific Coast, are characteristic of the War Relocation Authority’s site selection criteria.” o “Internees transformed undeveloped arid land into irrigated agricultural fields in and around the Minidoka Relocation Center. The present-day agricultural character of the Hunt area is the legacy of the internees’ labor during World War II.” o Agricultural development following World War II. The NPS’s 2016 Foundation Document further refined the General Management Plan and summarized the park’s fundamental resources and values including: • Environmental Setting: “Minidoka’s remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood…Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.” • Commemoration and Healing: Minidoka provides a place “… for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.” • Public Understanding, Education, and Involvement: “Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.” While an improvement over LS Power’s Plan of Development, Alternatives C and E would have significant negative visual impacts on Minidoka NHS’s fundamental resources and values, the Minidoka Relocation Center and Minidoka TCP. As depicted in the DEIS, Alternatives C and E with both the 3 and 6 MW turbines are clearly visible from KOP 1 (Visitor Center), KOP 2 (Barracks Block 22) and KOP 16 (Honor Roll). The ACEC petition also identifies the significant negative visual impacts on other parts of the park including the fire station/water tower, reconstructed guard tower, and multiple reflective stops located throughout the park.237 Based on the visual models, the visual impacts are significantly worse in the mornings, based on the backlighting of the turbines by the rising sun. Because of inherent limitations in printed and computerbased images, the DEIS’s static and dynamic visual simulations do not accurately convey the real world on the ground impacts on the park’s resources and visitors. Also, there is a high level of subjectivity in BLM’s ratings analysis, as each rater has his or her own perception. BLM’s dynamic simulations show a wall of wind turbines that would occupy a significant percentage of the park viewshed and would damage the park’s fundamental resource values and have significant negative impacts on both feeling and association. The dynamic simulations depict the shorter 3 MW wind turbines (545 feet), rather than the larger 6 MW turbines (740 feet). In analyzing Alternative H, BLM notes that there is lesser wind resources at lower elevation. The dynamic simulations also do not show the harmful impacts of the turbine lights on the night-sky.	participated in the preparation of the PA that would stipulate the process necessary to comply with Section 106 obligations. KOP selections, which represent sensitive viewing locations, including the Minidoka Visitors Center, Block 22 Barracks, and the Honor Roll KOPs, were coordinated closely with the BLM and NPS. See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project, including the BLM visual contrast rating analysis. To ensure limited subjectivity during the contrast rating process, multiple BLM and NPS team members participated in the process and iterative rounds of rating occurred. For further information on the visual simulations for the project please see responses to comments 11423-4, 11454-2, and 11458-5 (see in Table A-3y, Visual Resources). MVE has committed to mitigating night sky impacts as detailed in EIS Section 3.16.2 (Night Skies). Mitigation for lighting for the turbines and any other facilities is detailed in EIS Appendix 4 (Mitigation).
12859-33	Kristen Brengel, Robyn Achilles; Friends of Minidoka	BLM’s analysis does not evaluate the visual impacts from the “glinting.” According to a study by the Argonne National Laboratory: Blade glinting is the brief, often repeated flash of point-like light reflection from wind turbine blades, typically seen near the hub.	Recent studies have shown that blade glinting has been mitigated by anti-reflective coating on modern turbines and was not considered as part of the analysis. See study here: https://www.dit.sa.gov.au/__data/assets/pdf_file/0003/451587/422E00317_2g_-_Shadow_Flicker_and_Blade_Glint_Assessment.pdf
12859-34	Kristen Brengel, Robyn Achilles; Friends of Minidoka	BLM’s analysis does not evaluate the visual impacts from the “strobe effect.” According to a study by the Argonne National Laboratory: Shadows of turbine blades falling on towers when the sun is at a low elevation can cause a strobe-like effect as the blade shadow passes the lit tower repeatedly. In some instances, this can add substantially to the visibility of the wind facility.	The “strobe effect” referenced in your comment is referred to in the EIS as “shadow flicker,” and the analysis of this phenomenon is contained in Section 3.16.3 (Shadow Flicker).
12859-37	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Additional KOPs – Historic Fire Station (former Herrmann farm). BLM’s limited selection of KOPs at Minidoka does not accurately assess the visual impacts on sensitive user groups. The old fire station is located on higher ground and would enable the BLM to get a better understanding of the impacts on the park.	The BLM and NPS coordinated on the location of KOPs that were included as part of the analysis.
12859-39	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Visual Resource Contrast Rating. BLM did not follow its policies relating to visual resource contrast ratings with regard to degrees of visual change. BLM policy requires field offices to designate visual resource management classes.253 However, the Monument RMP does not include have VRM classes.254 The BLM policy for this case is “[w]here there are no RMP approved objectives, interim Visual Resource Management (VRM) classes	See responses to comment 11535-149 (see in Table A-3y, Visual Resources) and comment 12538-4 (see in Table A-3y, Visual Resources). The BLM determined and added project-specific interim VRM classes and objectives to the final EIS; please see Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.

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		will be developed using the guidelines in Handbook H-8410-1 except: (1) The inventory will be limited to the area affected by the project; and (2) the VRM classes will reflect the management decision made in existing RMP's."255 While BLM completed project related visual resource inventories,256 the Visual Resources Technical Report said it would not evaluate conformance with existing or interim VRMs, as required by BLM policy.257 Identifying interim VRMs will help guide agency actions, including mitigation.258 For Alternatives C and E, the BLM describes the impacts on the Minidoka KOP's as "moderate." The purpose of determining degrees of visual change, whether major or moderate, is to compare those findings with the RMP's VRMs, or interim VRM classes.259 Please include interim VRM's in the DEIS.	
12859-40	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Degree of Visual Change. The DEIS states that both alternatives C & E would have moderate degrees of visual change based on a percentage of visible acres within the distance zone. BLM's distance zones are defined as immediate foreground (0-2 miles), foreground (2-10 miles), middleground (10-20 miles), and background (20-30 miles). BLM's should consider a model developed by researchers at the Argonne National Laboratory, which was commissioned by BLM, which shows major impacts at farther distances.260 The Argonne analysis found that: "[u]nder favorable viewing conditions, the wind facilities were judged to be major foci of visual attention at up to 19 km (12 mi) and likely to be noticed by casual observers at >37 km (23 mi). A conservative interpretation suggests that …facilities could be major sources of visual contrast at up to 16 km (10 mi)."261 We encourage BLM to consider the Argonne methodology because it more accurately assesses the impacts.	The analysis and determination of distance zones used in this EIS was based on *Wind Turbine Visibility and Visual Impact Threshold Distances in Western Landscapes* (Sullivan et al. 2012). The project visual resources technical report (SWCA 2024) describes this in Sections 1.1, 4.1.3, and 5.1. See also response to comment 11535-148 (see in Table A-3y, Visual Resources) for information related to the Argonne Visibility Level Rating methodology.
12859-41	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Sensitivity Level Analysis. The DEIS's visual resource inventory is based on its Sensitivity Level finding of Moderate. BLM policy requires field office to prepare sensitivity level analysis, based on high, medium or low sensitivity levels "by analyzing the various indicators of public concern:"262 Below are the rating elements taken from BLM Form 8400-6 Sensitivity Level Rating Sheet: 1. Type of Users. Visual sensitivity will vary with the type of users. Recreational sightseers may be highly sensitive to any changes in visual quality, whereas workers who pass through the area on a regular basis may not be as sensitive to change. 2. Amount of Use. Areas seen and used by large numbers of people are potentially more sensitive. Protection of visual values usually becomes more important as the number of viewers increase. 3. Public Interest. The visual quality of an area may be of concern to local, State, or National groups. Indicators of this concern are usually expressed in public meetings, letters, newspaper or magazine articles, newsletters, land-use plans, etc. Public controversy created in response to proposed activities that would change the landscape character should also be considered. 4. Adjacent Land Uses. The interrelationship with land uses in adjacent lands can affect the visual sensitivity of an area. For example, an area within the view shed of a residential area may be very sensitive, whereas an area surrounded by commercially developed lands may not be visually sensitive. 5. Special Areas. Management objectives for special areas such as Natural Areas, Wilderness Areas or Wilderness Study Areas, Wild and Scenic Rivers, Scenic Areas, Scenic Roads or Trails, and Areas of Critical Environmental Concern (ACEC), frequently require special consideration for the protection of the visual values. This does not necessarily mean that these areas are scenic, but rather that one of the management objectives may be to preserve the natural landscape setting. The management objectives for these areas may be used as a basis for assigning sensitivity levels. 6. Other Factors. Consider any other information such as research or studies that includes indicators of visual sensitivity. The DEIS rated the Twin Falls Metro SLRU (#01) and Wilson and Kimama Buttes SLRU (#05) as "moderate" for sensitivity level rating.263 The Visual Resources Technical Report found that "the combination of the amount of use, diverse user groups, public interest associated with locations within the area, and designated special areas (e.g., Minidoka Historic Site and the Snake River Canyon) have relative visual importance. This also means that there is a moderate level of tolerance related to visual changes within the landscape in general based on the degree of modifications that currently exist. It should be noted that localized sensitive groups occur within the SLRU (e.g., Minidoka Historic Site visitors) where the surrounding visual context and character of the area is important and of higher sensitivity to visual change from a cultural-visual perspective than the typical visitor due to the significance of the site and historical context." The BLM's moderate sensitivity level ratings for the two SLRUs is based on flawed analysis. It does not appear that the BLM considered the Minidoka TCP when it found a moderate sensitivity level rating. There is a high level of public concern about the Twin Falls SLRU (#01) and Wilson and Kimama Buttes SLRU (05) to support a finding that the sensitivity level rating is high.	As a result of the public process, the degree of visual sensitivity (SLRU) associated with the VRI for Minidoka NHS and Minidoka WRC has been re-evaluated and adjusted accordingly based on public and agency input.
12859-42	Kristen Brengel, Robyn Achilles; Friends of Minidoka	The following suggested analysis and ranking is based on BLM Form 8400-6 Sensitivity Level Rating Sheet: 1.Types of user. Because of the importance of Minidoka as a place for healing and learning, the Japanese American community is highly sensitive to any changes in visual quality. The Japanese American community has fought to preserve Minidoka's viewshed to preserve the immersive setting, feeling of isolation and to interpret the living conditions of Minidoka incarcerees, as required by Congress. BLM's stakeholder report found that the Japanese American community has deep and unique connections to the scenery around Minidoka.264 Also, the Lava Ridge Subcommittee received information highlighting the importance of maintaining visual quality for recreational users and the immersive experience: Suggested ranking: "Maintenance of visual quality is a major concern for most users" High 2. Amount of use. According to the BLM's table for classifying the amount of use "recreation sites, with greater than 10,000 visitor days/year," merits a high ranking for visitor use. In 2022, Minidoka National Historic Site received 13,717 visitors.265 This does not include recreational visits to the public lands and use of roads and highways through the project area. Suggested ranking: "Maintenance of visual quality becomes more important as the level of use increases" High (based on the BLM's Table for Classifying Amount of Use) 3.Public Interest. LS Power's Lava Ridge proposal has generated a high level of public interest both locally and nationally as demonstrated by: scoping letters submitted to BLM, articles and press coverage in local, regional and national news outlets, designation of Minidoka as one of the 11 most endangered sites by the	See response to comment 12859-41 (see in Table A-3y, Visual Resources).

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		National Trust for Historic Preservation in 2022, extensive public comment and participation in the BLM's Lava Ridge Subcommittee including a very large turnout for the June 2022 tour, letters of opposition, public comments, and the Subcommittee's final report, several large Stop Lava Ridge meetings in Jerome starting in May 2022 and running through February 2023, letters to the editor of the Twin Falls Times-News, the Stop Lava Ridge web-page and facebook group. The high level of controversy is also demonstrated by the letter to BLM signed by the Governor, Lt. Governor and Members of the Idaho Congressional delegation in February 2023, unanimous passage of House Concurrent Resolution #4 opposing the project in the Idaho Legislature, questions from Mike Simpson to the Secretary and BLM Director at March 2023 budget hearings before the House Interior Appropriations Subcommittee, a seven county anti-Lava Ridge resolution attended by several hundred people,266 and an anti-Lava Ridge rally in Twin Falls on April 11, 2023. Suggested ranking: "Maintenance of visual quality is a major public issue" High 4. Adjacent Land Use. The Minidoka National Historic Site and Minidoka Relocation Centers are adjacent land uses.267 The National Park Service, through its management planning, has identified the viewshed as a fundamental resource and value to be managed unimpaired. Suggested ranking: "Maintenance of visual quality to sustain adjacent land use objectives is very important" High 5. Special Area. Minidoka is a Presidentially-designated and Congressionally-ratified unit of the National Park System. Congress has given specific guidance for the management of the Minidoka Relocation Center. Suggested ranking: "Maintenance of visual quality to sustain Special Area management objectives is very important" High 6. Other Factors. As noted above, the Friends of Minidoka commissioned a report that found that Minidoka's viewshed located in the Twin Falls and nearby SLRUs is Traditional Cultural Property (TCP). The Idaho SHPO has concurred with a finding that the TCP is eligible for listing on the National Register of Historic Places. As noted above, the Friends of Minidoka submitted a petition to BLM to designate the area as an Area of Critical Environmental Concern, which is currently being reviewed. And as noted above, there is substantial guidance from the Biden Administration relating to racial and environmental justice, AANHPI heritage, underserved communities and telling the whole story. In addition, the BLM should address how the Twin Falls and Wilson and Kimama Butte SLRUs were delineated. BLM policy states that SLRU "boundaries will depend on the factor that is driving the sensitivity consideration. Consequently, a thorough review of the factors referred to in IIIA [Sensitivity Level Analysis - Factors to Consider listed above] should be completed before any attempt is made to delineate SLRU's." 268 These factors include the TCP and proposed ACEC.	
13006-28	Leon Smith	5) Recommend examining the visual impact on the alpine ski experience from the Seattle Ridge at the Sun Valley resort.	KOPs were chosen to represent specific places, areas, and features that have visual importance relative to one's home, social, business, and recreation environment. This includes where the public would view the project from both stationary (e.g., residential areas) and or linear (e.g., major roadway) locations. The KOPs were chosen for this project in coordination with the BLM SFO and cooperating agencies. Project mitigation for impacts is outlined in EIS Appendix 4 (Mitigation).
2827-1	Brian Ito	I appreciate the visual simulations. They have confirmed my belief that these wind turbines will adversely affect a visitors experience of the Minidoka concentration camp site. I believe the visual impact, in reality, will be even greater than depicted in the visual simulations.	See response to comment 11458-5 (see in Table A-3y, Visual Resources).
3244-1	Cindy Bitzenburg, Jim Bitzenburg	We have reviewed the project's Draft Environmental Impact Statement, and we believe the portion of the EIS dealing with the visual impacts of the project vastly underestimates the overall visual contamination that the project would have on the entire Magic Valley. The Key Observation Points (KOP) discussed so extensively in the EIS do not address the effects that the majority of the Magic Valley would experience from the project.	The KOP selection process was used to identify locations surrounding the project that would be most representative of viewers in the area. This process and reasoning for KOP selection is discussed in Section 4.2 (Sensitive Viewers and Key Observation Points) in the project visual resources technical report (SWCA 2024).
3502-1	Diana Nielson	I am opposed to the Lava Ridge Wind Turbine Project Concerning Visual Resources Simulations: I have taken many photos at similar distances. The images and image angles diminish the visual impact of the Wind Turbines. See Vol 4a Appendix 5. VRS 1 of 13 Kop 5 Alternating distance from Idaho Highway 24. There isn't a physical point of reference used in the photos. About my Images:Here is an actual photo at 2 miles of 400 foot tall wind turbines with my Nikon D7500 cropped frame. I am not a professional photographer. Milner Butte Wind Project 13 Turbines online in 2011: each turbine 1.5MW hub 262.5 ft Rotar Diameter 270.67 ft total Hight 398.622 feet. Taken with my Nikon D7500 at 2 miles Wind Turbines are 1.5 MW Zoomed in so the Semi Tractor trailer can be seen to help compare with 400 foot turbines. Semi is 1 mile closer than the turbines on Hwy 30. 400 foot turbine on Burley Butte. Photo taken from Sugar Beet Dump ND HWY 30. The Photo's below are from APP C V19 KOP 16 Technical Report of the the Honor Roll. The photos do not represent what you would see if you were there to look at the Honor Roll and are close enough to read. The Honor Roll is elevated on a hill. This photo is so far back it appears downhill.. The photographer is standing far back so you can't even read the names.	See responses to comments 11458-5 (see in Table A-3y, Visual Resources) and 11535-147 (see in Table A-3y, Visual Resources) for information regarding simulations. KOP selection was coordinated closely with the BLM and NPS for selection of areas to represent sensitive viewing locations and areas within the analysis area.
5177-2	Valerie Chappell	Another quality of life negative impact is shadow flicker. Shadow flicker is a phenomenon that occurs when the sun is low on the horizon and is interrupted by the blades of wind turbines casting rapidly moving shadows in nearby homes and other buildings. This can cause significant annoyance and disruption to daily life, as well as health problems such as headaches and disrupted sleep patterns. The proposed Lava Ridge Wind Project has the potential to cause significant shadow flicker in nearby homes and buildings, negatively impacting the quality of life for residents. This is particularly concerning, as the project is proposed in a densely populated area with many homes and other structures that could be affected.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. Section 3.16.3 (Shadow Flicker) provides analysis of potential shadow flicker impacts to residences surrounding the action alternatives.
5180-1	Leo Malberg	I am wondering why the wind towers can't be placed so not be in eye sight of the the encampment area. Don't know why not. I hardly believe that there is not suffent land area futher north (or) east of the monument. If not	The BLM has worked with the NPS and Magic Valley to select alternatives that would reduce the number of turbines in view from Minidoka NHS. Additionally, areas north and east of Craters of the Moon National Monument and Preserve are outside the area of the siting corridors.

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		perhaps the project managers need to cut-back on the amount of towers to the area that would impac the monument site. Pretty sure that they have Grandfather righs in that area if that means anything.	
6868-5	Barbara Martien	Noted that the following areas were not completely covered. [...] The report seems to minimize the size and appearance of the wind turbines. The ones that I see north of Pendleton Oregon have a huge impact seen for miles.	See responses to comments 11454-2 (see in Table A-3y, Visual Resources) and 11535-147 (see in Table A-3y, Visual Resources).
6870-2	Name Not Provided	The DEIS talks a lot about visual resources and levels of impact to Minidoka. I have studied the visual simulations online, and the posters at the public meetings misrepresented the severity of impacts. Why did the posters only show 3MW turbines instead of 6MW turbines? Also, the Honor Roll simulations were mislabeled as Visitor Center. Using the smaller turbines is not telling the whole truth in the public meetings. It was apparent that the intent was to minimize the severity of the alternatives and impacts to Minidoka.	After reviewing this comment, the BLM has found the mislabeled simulations and provided the correct name.
6913-8	Public Comments Canyon Crest Events Center	I would like to the comment on the illustrations they have photographed from the internment camp with the proposed windmills in the background. The size of the windmills don't depict the actual size they will be. I live at the end of East Road facing the power lines that are in these photos. The windmills should have been photographed from a nearby distance to show the difference in height and size of the existing transmission lines that are approximately 100 feet tall. I believe that would give the public a much better understanding of the scope of this project. Many believe that that was purposely done in order to gain more support for this project.	KOP locations were chosen through cooperation of the BLM and NPS. See responses to comments 11535-147 and 11458-5 (see both in Table A-3y, Visual Resources).
8629-3	Cathy Schiers	Additionally, these 400 windmills could be 700 feet tall with blinking lights. This not only impacts southern Idaho's dark night skies	All alternatives and both the 3-MW and 6-MW turbines, met towers, and associated infrastructure over 200 feet tall would employ an ADLS system that detects when aircraft is within 25 miles of the turbines. Using this system, the aviation lighting would be off approximately 92% of the time. See Section 3.16.2 (Night Skies) for more details on night skies and impacts.
8643-1	Steve Woods, Pam Woods	There will no doubt be a huge esthetic impact on the views of the Sawtooth mountains that Southern Idahoans now enjoy. Nearly 400 turbines over 700 feet tall will cloud the pristine view enjoyed all day. And 400 flashing lights at night won't be that enjoyable either.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11411-5 (see in Table A-3y, Visual Resources) for details on night skies impacts.
9080-16	The Coalition to Protect America's National Parks	4. Prior to receiving the Project proposal, BLM had failed to conduct a baseline Visual Resource Management (VRM) inventory or classification22 that would have provided much needed landscape management objectives for the Project area – In principle, BLM should have prepared a baseline VRM inventory and management classification assessment during one of its previous land use planning processes for the area well before considering a project proposal of this magnitude. Under BLM's VRM system, the Class rating determines the landscape management objectives for the area. In this case, the 1986 Monument RMP23 did not include a VRM management classification or landscape management objectives that would serve as a baseline for determining the appropriateness of future development proposals. In addition, the RMP also did not recognize or consider the historical significance of the Minidoka WRC or contemplate the creation of Minidoka Internment National Monument by Presidential Proclamation in 2001 or the establishment of Minidoka NHS by act of Congress in 2008. As a result, protecting visual resources and landscape scenic values from the perspective of the Minidoka NHS or the WRC had never been formally considered by BLM before it received the LRWP proposal. Most concerning is that BLM waited until late in the DEIS planning process to finally determine that the project area would be considered a Class IV VRM area, which is the least protected class of visual resources in BLM's VRM system. See the Visual Resources Technical Report for the Lava Ridge Wind Project24 dated January 2023, which is 34th document listed on the Project website. Based on its completion date, this key report identifying the project area as a Class IV VRM area was not finalized until literally a few days or a few weeks before the DEIS was issued for public review. According to BLM Manual H-8410-125 on "Visual Resource Inventory," a Class IV rating allows "management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention." (Emphasis added) In other words, a Class IV rating provides little if any protection to viewsheds within or near the Project area, which in this case includes visual resources as seen from the perspective of Minidoka NHS and the WRC, and from Native American cultural sites such as Wilson Butte Cave.	See response to comment 12859-38 (see in Table A-3h, Environmental Justice and Socioeconomics). For more information about the VRI, see response to comment 11535-150 (see in Table A-3y, Visual Resources). For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources).
9080-18	The Coalition to Protect America's National Parks	In our scoping comments26 dated October 20, 2021, we voiced the concern that "if BLM were to conduct a baseline visual resource inventory or classification for the project area now only AFTER a massive wind farm has already been proposed, the classification results will be controversial regardless of outcome." In essence, waiting to determine the VRM Class and related landscape management objectives until after a major development has been proposed is out of compliance with BLM VRM procedures and creates the appearance of a conflict of interest on BLM's part. For that reason, in our scoping comments we strongly recommended that "BLM and NPS hire an independent third-party consultant, such as the Argonne National Laboratory,27 to conduct such a baseline assessment and VRM classification" so that the results would appear unbiased and credible. However, it appears that a BLM contractor, SWCA Environmental Consultants, conducted the VRM assessment for the Project; and SWCA has determined that "the visual resources within the project area would fall primarily under Class IV, with smaller portions of both Class II and III." The basis for this finding is not revealed until Section 4.1.4 of the Visual Resources Technical Report for the Lava Ridge Wind Project_508 (report),28 which is the 34th document listed on the BLM eplanning website. SWCA's VRM analysis and determination are not adequately described or explained in the DEIS proper or in its appendices. However, it appears that BLM has adopted SWCA's recommendation, as indicated by Figure 3.16-4 in the DEIS, which is a	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. Also see response to comment 12859-38 (see in Table A-3h, Environmental Justice and Socioeconomics). For more information about the VRI, see response to comment 11535-150 (see in Table A-3y, Visual Resources). For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources).

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		color coded map that indicates the project area is considered a Class IV area. The figure in the DEIS is the same as "Figure 5. Visual resource inventory classes for the analysis area" in the contractor's report. Because SWCA's technical report is dated "January 2023," it suggests that BLM has adopted a last minute recommendation that BLM should allow the highest level of development and visual resource impacts within the Project area. Based on the respective landscape management objective descriptions, it seems that a Class IV rating is the only result that would allow the Project to move forward at this location.	
9080-19	The Coalition to Protect America's National Parks	BLM's determination that the project area is a Class IV visual resource area at this stage of the planning process is problematic for several reasons. First, as explained on the BLM Visual Resource Management (VRM) Classes website,29 "[w]hen Visual Resource Management (VRM) class objectives are designated for the lands in an RMP, management actions and allowable uses are determined that reflect the VRM class objectives." (Emphasis added) In this case, BLM had no VRM class objective(s) to serve as a basis for determining if the proposed Project is appropriate or allowable. Similarly, BLM IM 2009-04330 states, in part: "The BLM Land Use Planning Handbook requires that VRM management classes be identified in land use plans based on inventories of visual resources as well as management considerations for other potential land uses… The VRM management classes are intended to establish landscape management objectives for a variety of surface disturbing activities." (Emphasis added) In this case, the classification analysis was conducted and VRM landscape management objectives were determined only after a major project proposal had been submitted and accepted by BLM as the Proposed Action.	See response to comment 12859-38 (see in Table A-3h, Environmental Justice and Socioeconomics). For more information about the VRI, see response to comment 11535-150 (see in Table A-3y, Visual Resources). For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources).
9080-20	The Coalition to Protect America's National Parks	Second, it is a concern that the determination of the Class IV rating for the project area is not described until a technical report that is the 34th document listed on the BLM eplanning website.31 It would have been appropriate to provide a summary of the VRM class analysis and determination in the body of the DEIS (such as in Chapter 2 or 3 or in an Appendix), where it would have been more apparent and more likely to be subject to public review and comment. It appears the only information about the Class IV rating in the DEIS proper is the color coded map provided in previously mentioned Figure 3.16-4.	See response to comment 11535-149 (see in Table A-3y, Visual Resources).
9080-21	The Coalition to Protect America's National Parks	Third, the impact of BLM's failure to previously establish VRM-related landscape management objectives in the area surrounding Minidoka WRC is clearly reflected in MVE's siting decision, which is described in MVE's Plan of Development (POD) in DEIS Appendix C.32 Section C-2 on Alternative Project Locations indicates that MVE initially focused on several other locations that ultimately were found to be in conflict with sage grouse habitat protections. This resulted in the "lead federal and state agencies to encourage MVE to seek another alternative location for wind energy development… MVE proceeded to renew its siting analysis… Special emphasis was placed on avoiding areas designated as priority or important sage grouse habitat. As a result of these extensive siting efforts, MVE has identified the current Project area." (Emphasis added) Notably, in MVE's evaluation of "the current Project area," there is no mention of the area's VRM Class rating or landscape management objectives (presumably because there were none), or related concerns about visual resources in the vicinity of Minidoka NHS or the WRC. In contrast, the POD goes on to say that MVE ruled out another location based on potential conflicts with Class III visual resources. See Appendix C, Subsection 3-1.1.1, which states: "MVE considered placement of wind turbines and substations within a Visual Resource Management (VRM) Class III area along Highway 24… However, it is not certain that wind turbines and substations will meet the VRM Class III management objectives… The current Proposed Action has removed all wind turbines and substations from the VRM Class III area." (Emphasis added) In other words, MVE recognized and avoided potential conflicts of building a wind farm in another location with a Class III rating; but absent any existing VRM Class rating for the Project area, MVE apparently did not anticipate and/or was not informed by BLM of potential conflicts with the protection of visual resources surrounding Minidoka NHS.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. Also see responses to comments 12859-38 (see in Table A-3h, Environmental Justice and Socioeconomics) and 12538-41. For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources).
9080-22	The Coalition to Protect America's National Parks	Fourth, the BLM should have been well aware of wind turbine visibility and visual impact threshold distances in western landscapes. A 2012 study33 of wind turbine visibility in western landscapes conducted by the Argonne National Laboratory for the BLM found that: Under favorable viewing conditions, the wind facilities were judged to be major foci of visual attention at up to 19 km (12 mi) and likely to be noticed by casual observers at >37 km (23 mi). A conservative interpretation suggests that for such facilities, an appropriate radius for visual impact analyses would be 48 km (30 mi), that the facilities would be unlikely to be missed by casual observers at up to 32 km (20 mi), and that the facilities could be major sources of visual contrast at up to 16 km (10 mi). (Emphasis added) Yet BLM has entertained multiple action alternatives that would allow industrial-scale wind turbines in close proximity to culturally significant resources, such as Minidoka NHS, the WRC, and Wilson Butte Cave. All action alternatives would allow turbines at distances the 2012 study found "could be major sources of visual contrast" (i.e., within 10 miles); and "unlikely to be missed by casual observers" (i.e., within 20 miles).	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See response to comment 11535-148 (see in Table A-3y, Visual Resources) for information on the Argonne Visibility Level Rating methodology.
9080-23	The Coalition to Protect America's National Parks	Last but not least, the proximity of wind turbines to sensitive viewing locations in each of the action alternatives is fundamentally at odds with BLM guidance described in "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands" (BMPs),34 published in 2013. Specifically, Section 6.2.1, p. 141, of the BMPs recommends: "Site [alternative energy] facilities and ROWs outside of sensitive viewsheds or as far as possible from sensitive viewing locations." (Emphasis added) Given the proposed size of the wind turbines, a minimal setback of 0.5 mile from the boundary of Minidoka NHS or 1.0 mile from Wilson Butte Cave, as proposed under Alternative B, are obviously not "outside of sensitive viewsheds or as far away as possible from sensitive viewing locations." Why did BLM not follow its own BMPs "for reducing visual impacts of renewable energy facilities on BLM-administered lands?"	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. Throughout the preparation of the EIS, the BLM has used the mitigation hierarchy to identify measures and alternatives that would avoid and minimize potential impacts. The development of measures and alternatives have been informed by the robust suite of outreach efforts that the BLM facilitated throughout the preparation of the EIS. The BLM provided opportunities for input early on through coordination with stakeholders and

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			cooperating agencies and incorporated input from the public throughout the preparation of the EIS. These outreach efforts have resulted in considering elements that have the potential to minimize adverse impacts. Through completion of the BLM's evaluation of the project consistent with NEPA, a decision will be based on an analysis of the full range of potential impacts with consideration for the use of appropriate BMPs.
9080-47	The Coalition to Protect America's National Parks	G. Section 3.16 Visual Resources (p. 3-196) – As described in the DEIS, "[t]he SFO Monument Resource Management Plan (BLM 1986b) does not establish Visual Resource Management (VRM) classes or associated management objectives for BLM public lands in the siting corridors; for this reason, conformance with BLM VRM objectives was not determined in this analysis." (Emphasis added) As background, see General Comment 4 above, which we will not repeat in full here. We have numerous concerns about BLM's failure to determine the VRM class or related VRM management objectives before the Project proposal had reached its current stage of development: • In principle, BLM should have prepared a baseline VRM inventory and classification assessment well before considering a project proposal of this magnitude because the VRM classification determines the landscape management objectives related to how much future development and related impacts would be appropriate. Lacking such objectives, BLM had no basis for evaluating the appropriateness of the wind project (i.e., how much development and/or VRM impacts should be allowed based on the management objectives) when it was first proposed. • The impact of BLM's failure to previously establish VRM management objectives in the area surrounding Minidoka NHS is reflected in MVE's siting decision. As described in MVE's Plan of Development (POD) in Appendix C,55 MVE avoided a different project location due to potential conflicts with VRM Class III visual resources and instead focused on the current project location. Absent any existing VRM Class rating or landscape management objectives for the Project area, it seems that MVE did not anticipate or was not informed of potential conflicts with the protection of visual resources surrounding Minidoka NHS. • In our scoping comments, we strongly recommended that "BLM and NPS hire an independent third-party consultant, such as the Argonne National Laboratory56, to conduct such a baseline assessment and VRM classification" so that the results would appear unbiased and credible. However, BLM did not do that. Instead, based on a contractor's study BLM has given the project area a Class IV VRM rating as indicated in Figure 3.16-4 (p. 3-407). The figure's color-coded illustration categorizes the Project Area as Class IV, which will allow the greatest amount of development and visual resource impacts within the project area. • Last but not least, even lacking previously established VRM-related landscape management objectives for the Project area, allowing a massive industrial-scale wind farm in close proximity to culturally sensitive resources, such as Minidoka NHS, the WRC, and Wilson Butte Cave, is fundamentally at odds with BLM's 2013 "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands."57 Specifically, Section 6.2.1, p. 141, recommends: "Site [alternative energy] facilities and ROWs outside of sensitive viewsheds or as far as possible from sensitive viewing locations." (Emphasis added) A setback of as little as 0.5 miles from the Minidoka NHS boundary is obviously not "outside of sensitive viewsheds or as far away as possible from sensitive viewing locations." At its current location, the Project is in direct conflict with BLM's own 2013 BMPs for reducing visual impacts of renewable energy facilities on BLM-administered lands.	See Section 3.16 for disclosure of potential visual resources impacts from the project. See response to comment 12859-38 (see in Table A-3h, Environmental Justice and Socioeconomics). For more information about the Minidoka sensitivity rating unit see comment 12538-41. For more information about the VRI, see response to comment 11535-150 (see in Table A-3y, Visual Resources). For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources). The BLM has worked with the NPS and Magic Valley to select alternatives that would reduce the number of turbines in view from Minidoka NHS. The BLM will review all components of the project and make a decision on the project as detailed in EIS Section 1.3 (Decision to be Made).
9080-48	The Coalition to Protect America's National Parks	H. Subsection 3.16.1.2.2 Alternative B Visual Impacts, Key Observation Points (p. 3-413 to 3-418) – This section of the DEIS describes the "degree of visual change" from the perspective of the following viewer groups: Travelers; Tourists and Recreationists; and Residents. Notably absent from the analysis are two viewer groups with strong cultural connections to the site(s), which are the Japanese American Community which has a close connection to Minidoka NHS (KOP 1); and Native American Tribes which have a close connection to Wilson Butte Cave (KOP 10). The discussion in the "Tourists and Recreationists" section acknowledges such groups, without actually naming them, by stating: "Select sensitive viewer groups visiting Minidoka NHS may have impacts beyond the casual viewer in that they could experience the setting from a visual-cultural perspective disproportionally higher than the typical visitor." However, despite this statement, the DEIS goes on to characterize the visual impacts only from the perspective of the typical Tourist and Recreationist, and not from the perspective of the "select sensitive viewer groups." As a result, this section of the DEIS comes across to the reader as if BLM has mischaracterized Minidoka survivors and descendants and/or Native Americans as being the same as "Tourists and Recreationists," which would be inappropriate. To address this concern, we recommend that BLM describe visual impacts for an additional viewer group in the applicable sections of the analysis. The additional viewer group could be called something like "Viewers with Cultural Connections to the Site" and should include Minidoka survivors and descendants and/or Native Americans, depending on which KOP is being discussed. The added analysis should include not only a narrative description of the degree of visual impacts from the viewer groups' perspective, but also an additional Table 3.16-x titled "Degrees of Visual Change for Viewers with Cultural Connections to the Site."	The EIS has been revised to address sensitive viewers to Minidoka NHS as site visitors and recreationalists to meet the concerns of the Japanese American community and the sensitivity related to Minidoka NHS. The BLM feels the categorization of visitors addresses those concerns. Further information on impacts related to locations of cultural significance are located in Section 3.5 (Cultural Resources) and Section 3.6.1 (Environmental Justice Communities).
9657-5	Saiyare Refaei	The DEIS also does not protect the viewshed from the Minidoka NHS. The report draft states a "moderate" degree of visual change that will not protect the integrity of the Minidoka NHS.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
F2-6		The recreational and visual values with be severely depleted with the approval of the wind farm. I do not believe the BLM can approve this project and uphold their responsibilities to manage visual resources on this public land.	See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project. See Chapter 1 (Introduction) for information on the project, its purpose and need and the decision to be made by the BLM.

Water and Wetland Resources

Table A-3z. Water and Wetland Resources

Comment ID	Commenter	Public Comment	Response to Comment
1042-14	WildLands Defense	The presence of considerable amounts of basalt bedrock will necessitate blasting for both construction of roads and the building of towers and infrastructure. An estimated two blasts per day for 525 days is anticipated during construction. The blasting will contribute to overall noise, and many residents have expressed concern that the blasting may have an effect on the aquifer. [This is a major concern, as excavating soils and exposing and/or blasting impacts to cracks and fissures in lava can be highly unpredictable and cause serious water loss, and there is not adequate analysis of this significant impact. How will this impact canals in the area?].... [This ignores the loss of water through all the bulldozed off soil layers and as a result of cracks and fissures in the lava from blasting that may extend over a large area. Adequate geotechnical and geological studies have not been done].	Additional text was added to EIS Section 3.17.1 (Groundwater Quantity) to clarify that blasting is not anticipated to change groundwater quantity. New EIS Sections 3.17.2 (Existing Groundwater Wells and Canals) and 3.17.3 (Groundwater Quality) were added to analyze the effects of the project on existing wells and on groundwater quality. MVE has added applicant-committed measures 91 to 93, which include both pre- and post-blast inspection of wells within 300 feet of a blast (MVE 2023). If it is determined by the post-blast inspection that the blast caused damage to the structure, MVE would repair the damage. For Alternative B with Additional Measures and Alternatives C–E and the Preferred Alternative, the BLM has also added additional project-specific measures to further avoid and minimize potential effects from project blasting. As described in Sections 3.17.2 (Existing Groundwater Wells) and 3.17.3 (Groundwater Quality), with the additional measures in place, impacts to existing wells and groundwater quality would be largely avoided. See also AIB-34 for analysis of “How would the project affect prime and unique farmland or productive soils in the vicinity of the project and how many acres would be affected?”
10426-2	Casey Stevenson	These are my concerns which have not been addressed by the EIS which will impact thousands of people, and need to be reevaluated. Here are my concerns: Concerns on aquifer The installation of windmills in areas close to aquifers has raised concerns about the potential impact on the groundwater supply. Aquifers are underground reservoirs that hold water, which is crucial for human consumption, agriculture, and industrial use. The construction and operation of wind turbines can release contaminants into the soil and groundwater, such as lubricating oils. These contaminants can migrate to the groundwater and affect its quality. Furthermore, the operation of wind turbines can also lead to soil erosion as the spinning blades can create turbulence, which can lead to increased soil erosion and sedimentation. If the sedimentation enters the aquifer, it can reduce the aquifer's capacity to store water and, in some cases, contaminate it.	Additional text was added to EIS Section 3.17.1 (Groundwater Quantity) to clarify that blasting is not anticipated to change groundwater quantity. New EIS Section 3.17.3 (Groundwater Quality) was added to analyze the effects of the project on groundwater quality. For Alternative B with Additional Measures and Alternatives C–E and the Preferred Alternative, the BLM has also added an additional project-specific measures to further avoid and minimize potential effects from the project. With these additional measures in place, impacts to groundwater quality would be largely avoided.
10444-1	Myron Huettig	My brother has a ranch near the water recharge site on the Milner gooding canal. When recharge water flows out of the canal, forming a large lake, it only takes a week for this water to disappear when the water is turned off. Blasting in the area will damage this site at a great expense to magic valley farmers. [...] When low head hydro plants were put in the Milner Northside canal, the blasting needed to construct the reservoirs had a detrimental impact on local homeowners domestic wells as the water in the wells had become polluted from the canal water. The blasting needed for the windmills could have a similar effect on the snake river plain aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10448-1	Daniel Michaels	I believe the EIS generated for this project is extremely flawed. The EIS does not address the impact to the underlying aquifer by blasting foundation holes into the volcanic rock.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10477-3	Brenda Ford	Another thing that should be considered is when installing the windmills they will have to blast away the lava rock. We don't know where the Lost River runs, they could accidentally destroy it along with our aquifer if they aren't careful with how they blast.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10509-1	Sue Page	There have been absolutely no factual tests to ensure the safety of the aquifer beneath the Lava strata. No consideration of Mitigation Costs to replace the irreplaceable the lost of water to our valleys.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10512-3	S. (No Last Name Provided)	My own well went dry in 2016 and I had deepen it due to falling levels of the Snake River Aquifer. What downstream effects will it have on agricultural deep wells for irrigating? How many residents will have to invest thousands of dollars to deepen or redrill their wells to be able to reside at their location? If new deep well permits are not being handed out to farmers, why are any new permits being considered for the Lava Ridge project which has no local benefit since it is owned by out of state interests and the power will not even go to Idaho residents but to California and Nevada?	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).
1054-3	Jeff Juker	What are the effects on the aquifer going to be?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10543-1	Traci Wood	Drilling wells, the blasting and vibrations could potentially mess up our aquifer. [...] There hasn't been sufficient studies done to the satisfaction of the people of Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
10563-1	Roy Hubert	On February 15, 2023, Magic Valley Energy paid for an advertisement, about the water use needed for the Lava Ridge Wind Project. They stated: "The water required to support construction activities will not add to the cumulative use of water in the region, drawing instead from the rental of water from the Water Supply Bank." I have personally rented water through the Water Bank and know that is available at times and not available other times. I talked to the staff on the State Water Board, they told me that water in Lincoln, Jerome, and Minidoka counties is very scarce. When I told them that Magic Valley Energy plans to drill 6 new wells, I was told that they don't normally transfer water if a new well I drilled. This company will be drilling 6 new wells! (EIS Pg 511) Just a few years ago my home well went dry, as did others in this area, because the ground water had dropped and we all had to drill our wells deeper. That is when several farmers decided to help the aquifer recharge and use surface water from the Water Bank when it was available to irrigate their crops so the aquifer would recharge itself. Some day they will need all of this ground water again, and when they do, I want it to be used to grow crops for food, not to supply electricity to California. When we say that blasting could contaminate our ground	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		water, they use such vague terms as "I wouldn't expect it to impact the ground water" and "I assume the vibration would be dissipated." (Blasting V/I 3.2, pp 3-12) I drove to Joseph City, Arizona where the people were told that they didn't think that blasting for footings would impact the ground water. They were wrong. My brother, who lived in Joseph City and taught school there, told me that within a few short years the city had to pipe water from 20 miles away because their water was contaminated. The EIS states that it will take the equivalent of water that would be used to irrigate 75 acres of land. On one of the project tours, Mr. Weber, who is involved with sprinkling roads to control the dust, estimates it would be more like 900 + acres just to sprinkle the roads they plan to build.	
1082-1	Cameron Stauffer	Upon reviewing the EIS for the Lava Ridge Wind Project, there is insufficient information on the effect of water quality throughout the construction process, during operation, and recovery period. With a project this large, proposed in an area with an aquifer, this is extremely unsound planning. The traffic alone could impact the quality of the water in the aquifer. Construction, blasting, run off, temperature, etc... for example could bring change to the aquifer that needs to be considered. Additionally, the proposed 34 years operation could also have impacts on the quality of the water. While the EIS mentions "groundwater quantity" it fails to mention quality impacts on the water. "Implementation of MVE's applicant-committed measures to minimize ground vibrations or instability from blasting or excavating (measures 88, 91, and 123) (see EIS Appendix 4, Table App4-2) would reduce potential impacts to wells, springs, and aquifers during construction. In addition, measure AA required by BLM policy would require monitoring of groundwater use, which would inform water availability and potential adaptive management if needed." As stated, there will be impacts to wells, springs, and aquifers during construction. The risks taken here on effecting water sources are not adequately explained. Furthermore, the surrounding area is agricultural, and as such depends on the canals flowing near these projects. "Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified prior to blasting and excavating. If construction activities near aquifer recharge areas cannot be avoided, they would be closely monitored to reduce the potential for contamination of said aquifer." The EIS has established there is potential for contamination but has not made a clear plan to address these issues or avoid them. Fuels, and other materials used for maintenance and construction these projects should also be looked at closer. Their impact on water in the area should be addressed more thoroughly.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11195-3	Sandra Callen	We have an aquifer that has provided water to this area for millions of years. This will damage and leave the area without the water needed to sustain our farm ground, fisheries, and recreation.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11212-2	Ruth Muir, Ira Muir, Sherri Roche	This project threatens our precious water resources. I can not understand why blasting into a fragile aquifer would even be considered. This aquifer is the lifeblood for Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11223-2	Kelly Human	The proposed area has a tremendous aquifer running underneath it.My father drilled and Irrigation well and developed farm ground in that area in the 70s. As I remember the water table had standing water at less than 200feet underground. That whole area has many lava flows, sinkholes and caves and caverns underground.These are all inter-related to the water flowing under that area. I do not have the well logs as we sold the farm and moved away but that area is still farmed.When we drilled the well and I believe it was a 20 inch hole the well driller showed us how to see the water flowing the ground through the use of A mirror and sunlight. I believe there has not been enough study to the effects on our giant aquifer that runs under that area. They propose blasting four hundred holes for bases for the windmills. I am curious how deep they will need to blast the bases to hold up a 750 foot tall windmill? I certainly believe there is a possibility for damage to the underground aquifer. Do they have good numbers on where the water table lies?Our aquifer runs from eastern Idaho and some of the water is discharged in springs along the Snake River.The aquifer is the life blood of the north side of the canyon. It's supplies drinking water to people from their private Wells and supplies a great deal of irrigation water. The springs also provide drinking water for the city of Twin Falls and supplies freshwater for all of the trout hatchery's north of Buhl, Idaho.Our area is unlike any areaThat they have placed wind turbines. We have wind turbines on the bell rapid project which were placed on private property. The water table in that area is extremely deep.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11223-3	Kelly Human	The amount of blasting required to build these roads in addition to the blasting for the construction has the possibility to forever altar our aquifer and underground water flow. I have another point with the Gooding Milner Canal. It flows all through that area that they are proposing and that water is the lifeblood for many farmers. As mentioned earlier The basalt caves as well as the general rock formations increase the probability of leaks in the canal and water quantity loss and water quality issues underground. As Brian Olmstead the former manager of the Twin Falls Canal company stated At one of our meetings. When they blasted the basalt south of Kimberly they cracked the basalt and contaminated all the Drinking water wells in that area.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11225-1	Jeannie Billington	I am greatly concerned with the proven effects windmills have on our wildlife, insects, endangered species, migratory deer, the aquifer, and our environment and ecosystems as a whole. This includes the negative effects of chemicals sprayed during construction and in the future. The astronomical use of water during construction may in fact harm our food production, not only locally but on a national scale. As a grandma, I want to ensure a future for my grandchildren and generations after that, if the aquifer is damaged that future will not exist in Idaho. The aquifer drains into the snake river at points such as Thousand Springs, and if the water flow is limited or stunted there will be no water to send downstream for farms in Oregon and Washington, effectively limiting food production on the entire west coast	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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11226-1	Clare Josaitis	The DEIS indicates that water for this enormous proposed project would be withdrawn from the Eastern Snake River Aquifer. It took the State of Idaho well over 20 years to adjudicate every single drop of water in the Snake River Basin for farmers and ranchers in the Magic Valley, as well as, private use by households/domestic use wells, located throughout the surrounding communities which are going to be affected by this proposed project. MVE is not entitled to and should not be using ANY water from the Snake River. How would MVE acquire the stratospherically enormous amount of water they would need for the proposed project (for any action alternative)? The DEIS mentions the use of six wells by MVE. Does MVE hold the water rights to these wells? It is not explicitly stated. If MVE does not, how is water going to be obtained for this proposed project? Some of the math in the DEIS is quite incorrect. Could you please show your math calculations in the document or in an appendix? This project would use substantially more water than the 400 acre-feet indicated.	In response to public comments, MVE revised water quantities estimated for the project. These details were updated in Chapter 2 and Section 3.17 of the EIS. As described in MVE (2023) Section 1.3.11, the water required to support construction activities would not add to the cumulative use of water in the region. The project's water for construction would come from previously permitted sources that are already allocated for use. MVE would lease water through the Water Supply Bank, acquiring existing water rights, or purchasing water from commercial sources. MVE may divert the leased or acquired water rights to the proposed new wells in the project area in an effort to minimize the need to truck water into the project area.
11227-1	Clare Josaitis	The DEIS states that "Transmissivity [of water in the aquifer] ... does have spatial variations based on geology and other factors. Transmissivity is an important factor in considering the effects of water withdrawal from an aquifer; ...." There is no analysis in the DEIS that I can find that discusses stability of the underground lava tubes/aquifer or their ability withstand the forces of blasting, nor their ability to support these multi-ton wind turbines. A GE 1.5 mega-watt model weighs over 160 tons (nacelle, tower, and blades). Have an independent geotechnical engineer, structural engineer, and geologist been involved in analyzing the underground lava tubes/aquifer as to whether they can withstand the pressures and stresses imposed by blasting, construction activities, placement of wind turbines, and subsequent vibrational forces? Can the lava tubes support the proposed wind turbines for the entire length of the project without any risk to the integrity of the Snake River Aquifer? Has there been any analysis as to the risk of collapse and the effects of potential collapse of lava tubes and the transmissivity of water in the Snake River Aquifer if spatial variations are compromised? The entirety of the Magic Valley, besides other downstream users, depends upon the Snake River Aquifer. ISU.edu states that groundwater flows most rapidly in the upper 9- to 150 meters of the basalts, "which is the most productive portion of the aquifer. Interconnected pore spaces in the rubble tops of lava flows transmit water very readily." To what extent is wind turbine construction, blasting, weight of the turbines, and subsequent vibrational forces going to affect "the interconnect pore spaces in the rubbly tops of lava flows" that readily transmit water through the aquifer? How much compression would occur to the "rubbly tops of the lava flow flows" from the pressure and forces of the wind turbines, thereby affecting the flow and transmissivity of water through the aquifer? If independent studies have not been done, how can an informed decision be made? It is critical to know the totality of effects these wind turbines will have the Snake River Aquifer. Any loss or degradation to the Snake River Aquifer would most definitely irretrievable and irreversible, and could never be compensated for or recovered.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11228-1	Gary Smith	My concerns are about the Snake River Aquifer Region that will be under this project. Major concerns are the stress from blasting and the added weight on the lava bedrock that forms the ceiling of the aquifer. I was told they will only blast and drill to 12 feet or enough to hold the 50' to 70' diameter concrete foundations that will hold the tower and turbine. After learning that it increased my concerns of all that added weight and stress to the lava bedrock that is part of the aquifer and the purification ecosystem that is the life blood of the Magic Valley, Treasure Valley, and most of Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11228-2	Gary Smith	Below are my new questions and concerns to BLM Management: Kasey, Thank you for getting back to me. I looked through the material and was not able to find any detailed information on the foundations that will be built to hold the wind turbines. Could you send me the link and page number. Foundation concerns: 1) Will the foundation be cemented to the lava bedrock as part of the foundation. 2) Can you provide any independent studies that have been done or examples of this being done before. Will the concrete foundation be poured or attached to a lava bed surface to support a max of a 740' wind turbine. 3) Is it correct that these will be the largest wind turbine in the US? 4) While the foundations will be about 200' in places above the ceiling of the aquifers have studies been done by independent firms/universities about that much weight and stress on the aquifer formation and structure now and over time? 5) My concern being the fragile structure of lava rock between the surface and the aquifer with the added weight and stress of the wind turbine, the tower, and the foundation. Any independent studies on these concerns would be helpful. While I live miles away from the site the aquifer is the life blood of both Magic Valley, Treasure Valley and Idaho and my concern is for the future of my family and the future of Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11229-1	Gary Smith	Below is a report from ISU. It clearly states that the Snake River Plain controls the economy of much of southern Idaho, north and west of Pocatello. with very little data available on the impact of adding this much stress and weight onto the lava bedrock above the Snake River Plain Aquifer why would BLM risk what could be irreversible damage when other locations that are ecofriendly and provide the same benefits. I ask that you not approve this project at this location to protect the Idaho bloodline natural resource. Snake River Plain aquifer The Snake River Plain aquifer underlies the Snake River Plain, which extends from near the western boundary of Yellowstone National Park in eastern Idaho to the Idaho-Oregon border where the Snake River enters Hells	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		Canyon. The Snake River Plain controls the economy of much of southern Idaho, north and west of Pocatello (Stearns and others, 1938). Three million acres of farmland on the Snake River Plain are irrigated, with approximately one third from wells and the remaining two thirds from canals. This extensive irrigation system is the primary reason that Idaho has the highest per capita water consumption in the U.S. PDF slideshows: Water and the Snake River Plain by Paul Link - https://www.isu.edu/digitalgeologyidaho/srp-aquifer/ Overview of the Snake River Plain aquifer	
11232-1	Juanita Young	The Snake River aquifer is vital to the economy of Idaho, without it farm lands would disappear. Unless you all are terribly behind the times..we want to support small, local farms, that produce real food...not mega farms that are producing food that is toxic to human beings. The toxic chemical cocktail in the dynamite (ammonia nitrate and diesel) will penetrate the porous lava rock. Our hydrologist said it will penetrate down to the aquifer. Thus making the water unusable by man or beast.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11233-1	Janet Nesbitt	I am very concerned about this entire project, but most of all the impact it will have on our aquifer. My concern is the fragile nature of the lava rock between the surface and the aquifer itself in view of the stress of the multitudes of foundations requiring continuous drilling and blasting to be put in. Not to mention the ongoing extra weight and stress of the wind turbines and the towers. The lava bedrock that is part of the aquifer has been referred to as being part of the purification ecosystem that is the lifeblood of both Magic Valley, Treasure Valley and Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources) and AIB-31 in EIS Appendix 3 (“Is the surface geology in the siting corridors suitable for the project infrastructure? Is collapse/subsidence a concern, and if not, why?”).
11234-1	Myron Huettig	We have an Erie Lake sized aquifer underneath this area that provides water for thousands of farm acres down stream. The blasting for 400 bases the windmills will require will devastate and forever change the depth and flow of this water that makes its way to the thousand Springs area and other springs flowing into the Snake River. We cannot disturb the natural flow we currently have for a " green project " that is not green at all. Please see the importance of protecting this water source for all the people who depend upon it.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11238-2	Angela Mooney	Several large corporations produce food in the Magic Valley that is shipped worldwide, The depend on the water of the aquifer. That aquifer is sacred and is more important than any other commodity in the nation...that aquifer right there. Lamb Weston, Chobani, Standlee Hay, Falls Brand, Cliff Bar, Glanbia Chese and Agropur Cheese factories. They rely on the crops that feed the cattle that make the milk, or the fields that grow the potatoes and other crops. Your are looking at a global dynamic here. Interrupt the water, you interrupt food production and it's impact is millions, not just a few thousand residents of the Magic Valley. The blasts to lay foundations these monstrous, never-before-built towers, twice as tall as any wind mills every built, will definitely have an impact that is irreversible, ever, on that ancient water source.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11240-1	Name Not Provided	The aquifer is ancient, sacred ground that feeds the farms, ranches, dairies, and factories that produce food for millions. The vibrations from blasting, and from the windmills over the next few decades, will deconstruct what is left in the aquifer ceiling. It will also affect our health. This has been proven and litigated. The historical sights should be preserved and respected. The wildlife that will be effected will devastate the cycle structure and ecosystem that exists in our beautiful state. This can cause devastating effects on the surrounding states ecosystems as well. Damaging the aquifer will have devastating consequences on, not only southern Idaho, but Western and Eastern Idaho as well. The impact on the water supply will be irreversible. The unique natural design of the aquifer is delicate and should be preserved at all costs.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11262-1	Clare Josaitis	The comment corrects & replaces my original comment submitted on 4/15/2023. Thank you. The DEIS states that "Transmissivity [of water in the aquifer] ... does have spatial variations based on geology and other factors. Transmissivity is an important factor in considering the effects of water withdrawal from an aquifer ....". There is no analysis in the DEIS that I can find that discusses stability of the underground lava tubes/aquifer or their ability to withstand the forces of blasting, nor their ability to support these multi-ton wind turbines. A GE 1.5 mega-watt model weighs over 160 tons (nacelle, tower, and blades). Has an independent geotechnical engineer, structural engineer, and geologist been involved in analyzing the underground lava tubes/aquifer as to whether they can withstand the pressures and stresses imposed by blasting, construction activities, placement of wind turbines, and subsequent vibrational forces? Can the lava tubes support the proposed wind turbines for the entire length of the project without any risk to the integrity of the Snake River Aquifer? Has there been any analysis as to the risk of collapse and the effects of potential collapse of lava tubes and the transmissivity of water in the Snake River Aquifer if spatial variations are compromised? The entirety of the Magic Valley, besides other downstream users, depends upon the Snake River Aquifer. ISU.edu states that groundwater flows most rapidly in the upper 90 to 150 meters of the basalts, "which is the most productive portion of the aquifer. Interconnected pore spaces in the rubble tops of lava flows transmit water very readily." To what extent is wind turbine construction, blasting, weight of the turbines, and subsequent vibrational forces going to affect "the interconnect pore spaces in the rubbly tops of lava flows" that readily transmit water through the aquifer? How much compression would occur to the "rubbly tops of the lava flow flows" from the pressure and forces of the wind turbines, thereby affecting the flow and transmissivity of water through the aquifer? If independent studies have not been done, how can an informed decision be made? It is critical to know the totality of the effects these wind turbines will have the Snake River Aquifer. Any loss or degradation to the Snake River Aquifer would most definitely be irretrievable and irreversible, and could never be compensated for or recovered.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11297-2	Steven Upton, Linda Upton	The blasting will not only destroy artifacts, drive off the wildlife, but what about our ground water and aquifer? The Lava Ridge project sits right on top of the Snake River Plains aquifer. This supplies water to hundreds of thousands of people. Concrete foundations 75 feet diameter, 12 feet deep will require blasting for 525 days,	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		twice per day, blasting all over the top of aquifer, using high explosives and will amount to 126.000 lbs of explosives used. Blast waves are comparable to an earthquake. How will this affect our aquifer? If our aquifer is damaged, how will LS Power aka Magic Valley Energy take care of this issue?	
11309-1	Gena Anderson	I have many concerns about the Lava Ridge wind project, but in this letter I will focus on the aquifer. My concern is the damage that could happen to the aquifer and to our water supply that is crucial to the lives of so many people, businesses, and livestock. How can the residents of the Magic Valley be assured that the blasting needed for the concrete bases will not affect the aquifer? How can we be assured that the weight of the massive concrete bases in addition to the weight of the wind turbines will not damage the lava rock? How can we be assured that disturbing the aquifer will not contaminate the water supply? Where will LS Power be when the aquifer is damaged and the Magic Valley water supply is no longer available? Will LS Power be held responsible and if they are how will the situation be rectified?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11326-2	Filip Camacho, Tasha Sorensen	Alarmingly, an estimated 130,390,000 gallons of water would be required to conduct project operations just for Lava Ridge. The DEIS fails to address impacts to water resources and surrounding communities. As homeowners, with a private well, we are very concerned about de-watering of wells and direct and indirect impacts to water quality and quantity. If the BLM chooses an action alternative, we request homeowners and surrounding communities receive a thorough water analysis of existing wells and community water sources, monitoring of these wells and a guarantee that any direct or indirect impacts from installing and maintaining (way too tall) wind towers will not affect the quantity and quality of groundwater. In addition, the BLM should require a water budget analysis adjacent to all affected communities, ranches, farms, homesteads and others. The use of large quantities of water pumped from groundwater resources creates potential long-term effects on the stability and longevity of aquifers, seeps, springs, wetlands, etc. Groundwater is the largest source of freshwater for all life. Questions about the source, quantity, quality and recyclability of water are one of the most important considerations in the potential siting and development of this project. The DEIS states that water will come from existing irrigation districts or private landowners. We recommend a thorough water-right analysis identifying capacity of allocatable groundwater as well as an analysis of the impacts of blasting through and fracturing lava rock above the Snake River aquifer. Lave rock is easily fractured and the DEIS fails to account for any impacts to subsurface water resources. Water rights and water allocation issues have increasingly become more and more controversial. The provision of large quantities of water and its effects on water rights of surrounding communities and other large--scale users of water is causing significant concern among communities with local and state governments opposing projects. In fact, in south- central Idaho where many large-scale utility renewable energy projects are slated for permitting and development there is a moratorium on all new water allocations including any allocation from the Water Supply Bank.6 When we contacted the Idaho Division of Water Resources, they had never been consulted about Lava Ridge or any of the other proposed projects in the area.7	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11327-18	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	VII. Water Water rights and water allocation issues have become increasingly controversial across the West. The use of large quantities of water and its effects on water rights of surrounding communities and other large-scale users of water is causing local and state governments to show concern or oppose projects. Idaho is no exception- Idaho Department of Water Resources has placed a moratorium on all new water allocations in southern Idaho.55 While the DEIS states that the project proponent would acquire water for operations through negotiations and purchases with other private landowners or irrigation companies, we ask that the BLM seek greater coordination with Idaho Department of Water Resources to outline the scarcity of water availability in the area.	The State of Idaho is a cooperating agency on the EIS and is aware of the project and its proposed water use needs. Text was added to EIS Section 3.17.1.2.2 (Groundwater Quantity, Impacts) to address the role of the moratorium on project water use. Also see response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11333-1	Creighton Knight	I am writing in response to the EIS for the Lava Ridge Wind Turbine project. My concerns are that on page 511 of the EIS, the author determined that impact on the aquifer would be negligible. I believe this is not accurate and the concerns should be fully vetted before approving this project. Concerns and Questions Unanswered or Not Fully Vetted in the EIS: Blasting 2x per day for over 500 days. The EIS report on pg 511 reads that impacts will be negligible on the aquifer. This simply isn't true by common sense, reason, and by historical precedent in this area of aquifer and domestic well contamination caused by even small scale blasting of the lava rock. Blasting lava rock causes problems with nearby wells. According to Brian Olmstead, a 21 year veteran and former General Mgr of the Twin Falls Canal Co.,in 2006-07 while deepening the existing canal channel during construction of the Midway Power Plant, surrounding wells were contaminated with bacteria and other pollutants. The blasting of the canal channel opened cracks and fissures within the lava beds and contaminated underground water supplies. Citizens became ill from the contaminated wells. The Canal Company had to complete extensive remediation for the impacted citizens. Another event was the North Gooding Power Plant built in the lava rock north of Gooding. Lots of blasting was done in 2016 to improve plant capacity. When snowmelt and rainwater entered in the spring of 2017, the water fell through the new cracks and fissures caused from the blasting and it contaminated the aquifer. Due to disruption of the lava rock structure from the blasting, the natural filtering effects of the lava rock were damaged and allowed unfiltered water into the aquifer. Domestic wells were likewise contaminated and the Gooding Health department had to get involved to protect people's health. The main point is that blasting the lava rock opens up new cracks and creates fissures which allow run off water a more direct access to the aquifer and thus contaminates it. The examples cited here are part of the public record. The EIS does not acknowledge these occurrences nor the risks that 500+ days of blasting will have on the lava beds which filter our aquifer. If the examples above negatively impacted the aquifer and groundwater safety, how much more will a very large scale project with over 500 days of blasting impact	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		groundwater? How can an EIS skip over the most important resource in Idaho, which is our groundwater? This omission calls into question the seriousness and accuracy of the EIS in determining the true impacts the windmill project will have on the ecology. It also represents a lack of understanding by LS Power and the EIS authors of how vitally important the aquifer is to the entire economy and livelihood of Southern Idaho, and how blasting away at its structure will negatively impact it. If approved, the blasting from the construction of the tower bases will likely damage the lava bed and open the aquifer to contamination. What will LS Power do then? What can be done then? Nothing can be done; the damage will be permanent. As you weigh out the EIS and the comments supporting or questioning it's efficacy, I ask that you consider the precedents of how limited blasting contaminated groundwater. I also ask that you logically deduce how 500+ days of major blasting will not do even more damage to the aquifer.	
11346-1	George Parker, John Arkoosh	The Snake River Plain Aquifer and the canal systems are the life blood of our valley and our state. The DEIS does not adequately evaluate and address the possible negative impacts to these resources. Turbines shedding PFAS, as well as oils and other fluids are a contamination concern. Seismic activity due to blasting and turbine vibrations may change or divert water flows, or possibly open fissures allowing contamination or draining canals. An in depth study of possible effects is a imperative and a bond must be posted by the applicant to assure any damages will be wholly compensated. Such bond would likely need to be capable to cover damages in the hundreds of millions, possibly several billion dollars.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). In addition, MVE would be required to have a reclamation bond. This was clarified in EIS Appendix 4 (Mitigation), as applicant-committed measure 164.
11359-2	Alisa Bowman	Concern: The Snake River Plain Aquifer The Snake River Aquifer is central to Southern Idaho's prosperity. If this water becomes contaminated or dries up due to the projected wind farm, it will be detrimental to the livelihood of the area's residents and have a domino effect on the entire state. The Magic Valley is a huge agricultural contributor to the state/nation/world. Agriculture needs water. Who knows what the effect of all of the blasting on the fractured basalt for the DEEP foundations and construction of the towers will have on the water. Towers of this size have never been built before. We will not be a guinea pig for the rest of the world. It is inevitable that the water table would be compromised. How much? We may not know until it is too late! We NEED to PROTECT OUR WATER!	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11360-1	Sergio Arroyo Jr.	As a blaster, I have worked in many countries with many types of different soils, rocks, and blasting materials. There is absolutely no way that anyone can guarantee that the Snake River Aquifer would not be breached and contaminated by the over 500 days of blasting (at the proposed depth) over lava rock, with lava tubes running through it, and ash layers throughout. In an area where wells are collapsed and affected by distant seismic activity, we already know earth movements alter our water quality, and we know the ash layers often are unstable enough to require wells be cased. "Blasting emissions were estimated assuming two blasts per day for 525 days assuming 120 pounds of ammonium nitrate-fuel oil per blast using AP-42 Explosive Detonation factors. DEIS V 1, 3-12." Blasting at this rate does not allow time to x-ray each blast to make sure they have not fractured or breached the aquifer, so that they could begin emergency repairs to mitigate damage caused by the blast. Do they even have a crew of experts on site daily throughout the blasting period to implement emergency repair?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). MVE also added details to MVE (2023) regarding blasting and the Blasting Plan Methodology (Appendix I in MVE [2023]).
11360-5	Sergio Arroyo Jr.	"Measure bbb: MVE would gain a clear understanding of the local hydrogeology as determined by Idaho Department of Water Resources and the BLM. Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified prior to blasting and excavating" DEIS v 1, 3-440 "MVE would GAIN A CLEAR UNDERSTANDING". This project is not an educational project for MVE or its inexperienced employees. BLM workers have no experience and are not qualified to determine anything related to blasting over an aquifer. Only experienced blasters and experienced water experts have been field tested for "clear understanding". The EPA has established guidelines for single source aquifers, which this aquifer is. "Title:EPA Sole Source Aquifers ...The SSA protection program is authorized by section 1424(e) of the Safe Drinking Water Act of 1974 (Public Law 93-523, 42 U.S.C. 300 et seq.). This program is designed to protect drinking water supplies in areas with few or no alternative sources to the ground water resource, and where, ifto the ground water resource, and where, if contamination occurred, using an alternative source would be extremely expensive. EPA defines a sole or principal source aquifer as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. These areas may have no alternative drinking water source(s) that could physically, legally and economically supply all those who depend on the aquifer for drinking water...All proposed projects receiving federal funds are subject to review to ensure that they do not endanger the water source" epa.gov	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11396-1	Gina Jerke	the Snake River Aquifer. How will all the blasting/drilling affect our aquifer? What is the real risk of contamination to our water? Will their wells deplete the aquifer and hinder farming?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11400-1	Deborah Hillier	The obvious detriment to our water supply is crucial, and every one understands two years will never be enough, and it will go on and on sucking us dry, and having devastating effects on farm production,	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).
11414-1	Sue Page	In review of the EIS I don't believe the issue of water use and the amount of water requirements for the cement for foundations, for dust control on dirt roads vs. the amount of water for irrigation, dairy farms, industrial companies such as Chobani, Lamb Weston and the sugar beet factory.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).

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11414-2	Sue Page	There hasn't been any study or discussion of Mitigation should the blasting and vibrations rupture the aquifer system. Who will pay and how will the system be repaired? Who will pay to fix neighboring water wells if they are contaminated? Where is the time line for repairs? What is the plan to get water to all of Southern Idaho if the aquifer is crushed? Who will be responsible for the cost and repair? What time line will be in place?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11418-1	John Etcheto	I own property that is 4 miles due west from Eden Idaho. It is a small family ranch that has been in my family for 4 generations. Our drinking water on the property comes from a well and we have ground watering rights for livestock. I have numerous concerns about the windmills, but near the top of that list is the effect that blasting will have on the aquafer. I've heard that the blasting that will be required for the construction of the windmills will go on for 525 days. All of that blasting could lead to contamination of the aquifer, which could have a devastating impact on life in our area.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11420-1	Joyce Flick	Aquifers could be effected with the blasting to build the base for the turbines.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11429-2	Felicia Poteet	he safety considerations of wind turbines of such drastic size are also a concern. Additionally, how deep the concrete footings must be placed for such a huge turbine. I'm concerned this could affect our aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11433-2	Tom Zuiderveld	has the very real possibility of doing irreversible damage to our aquifer that is the life blood of the Magic Valley.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11443-1	Kelly Human	The Gooding Milner Canal runs from April to November and longer in times of aquifer recharge. The canal supplies irrigation water to area farmers as well as drinking water to livestock and all of the above mentioned wildlife.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11458-4	Kathy McKenzie, Bret McKenzie	Water Use--There has been extensive mitigations over the last 8 years or more with IGWA, water use and the level of Idaho's aquifer. The mitigations have included many and in some places extreme curtailment of water use designed to raise the level of Idaho's depleted aquifer. These mitigations have resulted in slower than projected replenishment of Idaho's aquifer. Can the BLM justify the drilling of new wells by an out of State entity for the use of Idaho's water when Idaho has curtailed that use from its own citizens and businesses due to the depletion of our aquifer??	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).
11461-1	Shirl Bennett	My primary concern is for the Snake River aquifer. I could not find any studies in the EIS which showed how blasting in the lava rock would effect that aquifer. My fear is that irreparable damage could be done.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11478-1	Sandra Thompson	As residents of Jerome County who live less than 3 miles of this site we are concerned about the permanent destruction this project will cause to our desert environment and our aquifer. We believe the lava fields under this site can not withstand the initial blasting and subsequent weight of these windmills. That aquifer is the lifeblood of southern Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11490-2	Liz Niccum	There already exists many wind turbines in Southern Idaho. None have been built on top of the Snake River Plain Aquifer. This aquifer is essential to the Magic Valley. Where in the world does such a place exist like the Magic Valley? This is a unique location with a fragile water system. Blasting daily for two years to remove tons of basalt to make room for cement foundations will jeopardize the aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11491-16	Dean Dimond, Jennie Bateman	- In Summary of my substantive comments I list the following deficiencies or need for new information to be considered in the DEIS for the Lava Ridge Wind Project: […] 11.Information missing for effects on perennial and year-round “live” streams, [...]	Perennial streams are described and quantified in Section 3.17.4 (Wetlands and Surface Waters). Additional text was added to clarify impacts to waters.
11508-1	Justin Gott, Daniel Gott, Josie Gott	1. The project will be built over one of the largest aquifers in the United States. I understand there will be over 500 days of rock blasting and that could affect if not change the aquifer and that is something we can never get back	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11508-6	Justin Gott, Daniel Gott, Josie Gott	The roads and base of the wind turbines will need weed control and if Roundup, 2,4D, Milestone is applied then it would leak into the aquifer.	See AIB-47 in EIS Appendix 3: How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality? See AIB-58 in EIS Appendix 3: How would herbicide use impact soils, vegetation, and wildlife?
11516-2	Liz Niccum	many other issues like the threat to the Snake River Plain Aquifer from excessive underground stress from repeated blasting during construction not investigated in the Lava Ridge Environmental Impact Statement.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11521-1	Angela Mooney	Aquifer: As we read over the DEIS, the aquifer is mentioned only in relationship to a plan to use that water. That alone is alarming, as it is the lifeline of an economy that literally helps feed the nation. Even the proposed 3 percent per year would significantly impact such food production that feeds our factories: Falls Brand, Lamb Weston, Glanbia Cheese, Chobani, Amalgamated Sugar, Cliff Bar, the dairies that feed into these food production giants, the livestock that does the same, and so many other channels of production that are found in most grocery stores throughout the nation and the world. Not to mention the best potatoes in the world.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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11534-19	Matt Arnold, William Eubanks	The DEIS's Discussion of Potential Impacts to the Eastern Snake River Plain Aquifer is Woefully Inadequate As planned, the Project will be constructed directly above the Eastern Snake River Plain Aquifer ("Aquifer"), which spans at least 10,800 square-miles between Twin Falls and Fremont, Idaho. DEIS at 3-435, 3-437. While the Aquifer contains "as much as 1 billion acre-feet of water," only "100 to 200 million acre-feet," stored in the "top few hundred feet," are accessible to ground-water wells. Id. at 3-437. The vast majority of the Aquifer (90%) is composed of highly fractured basalt, measuring "just a few feet to tens of feet thick." Idaho Nat'l Lab., Idaho's Treasure; the Eastern Snake River Plain Aquifer at 3 (May 2005), https://bit.ly/3omBqyh.15 The fractures between these basalt formations are where the Aquifer's water is held and transported. Id. at 4. According to the Idaho Department of Water Resources, the Aquifer "is a key element of southern Idaho's economy," as the farmers and business-owners who rely on it "produce[] approximately 21% of all goods and services within the State of Idaho—resulting in an estimated annual value of $10 billion." Eastern Snake River Plain Aquifer CAMP, IDAHO DEP'T WATER RES. (last updated Feb. 22, 2022, 2:46 PM MT), https://bit.ly/3A6Dhdh. In fact, the Aquifer accounts for "roughly 2.1 million irrigated acres . . . , which is approximately 60% of Idaho's total." DEIS at 3-437. Moreover, the Aquifer is classified by the U.S. Environmental Protection Agency as a "sole source aquifer," meaning that "it supplies at least 50% of the drinking water for people living above the aquifer and [] there is no alternative source of drinking water that could physically, legally and economically supply all those that depend on [it]." Idaho Nat'l Lab., supra at 1. Given that a significant portion of Idaho's economy relies on the Aquifer, local stakeholders—including SLR, its members, and supporters—understandably harbor serious concerns about the effects that the Project's construction, operation, and decommissioning may have on this critical water source. Chief amongst these concerns is the possibility that blasting and excavations associated with building Project infrastructure may irreparably contaminate the Aquifer and/or collapse the basalt voids (or "lava tubes"), thereby making groundwater inaccessible or more expensive to obtain. The DEIS, however, fails to include any meaningful discussion of these potential impacts. Instead, it summarily concludes that some unidentified "[m]itigation would reduce impacts below significance." DEIS at App'x 3-18. To the extent the DEIS actually discloses that mitigation it merely consists of the Project proponent "gain[ing] a clear understanding of the local hydrogeology" and "closely monitor[ing]" blasting/excavation "to reduce the potential for contamination of said aquifer." Id. But not only does the DEIS fail to specify what might actually be done "to reduce the potential" contamination, id., it also fails to explain why this will sufficiently mitigate potential environmental harms. In fact, by acknowledging that neither MVE nor BLM has "a clear understanding of the local hydrogeology," the DEIS practically admits that it does not know if adequate mitigation is even possible. See id. In circumstances like these, reviewing courts have routinely rejected an agency's reliance on undefined or amorphous mitigation measures to sidestep consideration of important environmental impacts. See Am. Rivers v. Fed. Energy Reg. Comm'n, 895 F.3d 32, 54 (D.C. Cir. 2018) ("Given the exceptional importance of maintaining minimum dissolved oxygen levels to the aquatic ecosystem, it was irrational for the Commission to cast those significant environmental impacts aside in reliance on some sort of mitigation measures, which the Commission was content to leave as 'TBD.'"); see also Neighbors of Cuddy Mtn. v. U.S. Forest Serv., 137 F.3d 1372, 1380 (9th Cir. 1998) (Because "'[m]itigation must be discussed in sufficient detail to ensure that environmental consequences have been fairly evaluated,' '[a] mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA.'" (quoting Carmel–By–The–Sea v. U.S. Dep't of Transp., 123 F.3d 1142, 1154 (9th Cir. 1997) and Nw. Indian Cemetery Protective Ass'n v. Peterson, 795 F.2d 688, 697 (9th Cir. 1986))); S. Fork Band Council of W. Shoshone v. U.S. Dep't of Interior, 588 F.3d 718, 727 (9th Cir. 2009) ("The Supreme Court has required a mitigation discussion precisely for the purpose of evaluating whether anticipated environmental impacts can be avoided. A mitigation discussion without at least some evaluation of effectiveness is useless in making that determination." (citing Robertson, 490 U.S. at 351-52)).	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11534-20	Matt Arnold, William Eubanks	The DEIS Fails to Engage in Any Qualitative Examination of the Project's Likely Impacts on Wetlands According to the DEIS, "[t]here are approximately 8,816 acres of wetlands and 1,709 miles of watercourses in the analysis area," including "551 acres of wetlands and 90 miles of watercourses" within the siting corridors themselves. DEIS 3-443. Nowhere in the DEIS, however, does BLM provide any qualitative evaluation of these thousands of acres of wetlands and miles of watercourses. Instead, BLM simply tallies up the acreage/mileage and concludes that due to aspirational "implementation of water-related applicant-committed measures and other mitigation . . . impacts to wetlands and surface waters would be largely avoided." Id. at 3- 447.16 Under NEPA, this is not enough. The Act obligates BLM to take a "hard look" at impacts on wetlands, including an assessment of what role these wetlands and watercourses play in local ecosystems—i.e., the "actual environmental effects." Klamath–Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt., 387 F.3d 989, 995 (9th Cir. 2004) (emphasis in original). BLM might, for example, endeavor to understand whether these wetlands are important for recharging the local aquifer, or whether the watercourses are an important source of water for migrating species in an otherwise arid locale. Without this information, the public is merely left to guess at what impact the loss of these wetlands might have on the local environment. This is precisely why the Ninth Circuit has consistently rejected the kind of purely quantitative approach employed by BLM here. Id. ("[W]hile a tally of the total road construction anticipated in the [] watershed is definitely a good start to an adequate analysis, stating the total miles of roads to be constructed is similar to merely stating the sum of the acres to be harvested—it is not a description of actual environmental effects."); see also Or. Nat. Res. Council Fund v. Brong, 492 F.3d 1120, 1133-34 (9th Cir. 2007) (same); Lands Council v. Powell, 395 F.3d 1019, 1027 (9th Cir. 2005) (same).	Additional text was added to EIS Section 3.17.4 (Wetlands and Surface Waters) to provide context for the role that wetlands play in the ecosystem. Text already stated what the functional effects to wetlands would be as a result of project ground disturbance.
11535-66	Steven Andersen	As an initial matter, the exact location of the turbines and roads is not defined in the DEIS, making analysis of the vast land and aquifer impacts difficult, if not impossible, to meaningfully analyze. What analysis is provided in the DEIS is vague and arbitrary. For example, the DEIS states that the analysis is located in the Snake River	The EIS does not say the project area is in the floodplain. Section 3.16.1.1 (Landscape Character and Scenic Quality, Affected Environment) states that the Visual Resources "analysis area is located within the Snake River Plain section of the Columbia Plateau physiographic region, which is characterized by a volcanic plateau with

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		floodplain but also asserts that “[t]here are no mapped floodplains in the siting corridors (Federal Emergency Management Agency 2020).”212 Moreover, it asserts that both access roads and riparian areas would be avoided “if practical” or “to the extent practicable.”213 If impractical, “appropriate design features would be used to reduce erosion and sedimentation.”214 This vague and ambiguous language does not provide sufficient direction or guidance.215 As rain-on-snow events continue to increase in the Northwest, many rivers are experiencing a high frequency of extreme winter flood events. These events often result in channel scouring and degraded habitats since rivers have been disconnected from their floodplain and have no release valve for these high flows. Construction of roads and other infrastructure should not impede the movement of water from the stream channel to the floodplain during flood events. Culverts must be sized to accommodate flood flows so that they do not constrict high flows and contribute to further degradation of the stream channel during a flood event. These procedures must be followed strictly and cannot be avoided due to mere practicality.	sediment deposits as a result of the Snake River floodplain (Fenneman 1931).” The visual resources analysis area is the area within 30 miles of the siting corridors.
11535-127	Steven Andersen	The construction, operation, and decommissioning of a wind farm has the potential to impact groundwater quality, quantity, and the established groundwater flow regime.377 Changes to the local water environment can affect receptors such as wells, springs, wetlands and waterways, and can also have implications for groundwater dependent ecology and land stability. 378 Already, the DEIS vastly underestimates the amount of water needed during the construction phase of the project. Even more, the construction phase itself has been grossly underestimated, as was pointed out in numerous comments. Indeed, the engineering for the project has not occurred and site specifics have not even been determined. The topography of the Idaho desert will require an excess amount of water to prevent dust pollution from the project’s many new access roads, and moreover, a project of this magnitude proposed can lead to pollution from spills or leaks of fuel or oil which can contaminate the groundwater. None of this was thoughtfully analyzed.	See responses to comments 1042-14 and 10426-2 (see both in Table A-3z, Water and Wetland Resources).
11535-128	Steven Andersen	There is no consideration in the DEIS for the effect that blasting for the turbine foundations will have on both surface water and ground water. Although the impact of blasting has been widely studied, the consequences of blasting in the Eastern Snake River Plain Aquifer have never been studied and the effects of this amount of blasting is not accounted for. Moreover, the percolation rates differ depending on the type of sedimentary rock. The DEIS does not account for the changes in porosity, which affects runoff collection and potential aquifer collection. Because the DEIS does not even state with certainty the exact location of the wind turbine foundations, no location-specific soil analysis of percolation can be done.379 Therefore, further analysis regarding the long-term impact of a project of this scale should be conducted before this project can be approved.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11535-129	Steven Andersen	The DEIS fails to take into account that the ESPA is a critical and sensitive water resource for Idaho – and one that is already over-appropriated. Significant work has been invested to fund aquifer recharge projects in the area, and the DEIS fails to consider impacts both practically and on the water rights of ground water pumpers, farmers and ranchers, water right holders in the Snake and Columbia River systems, fisheries, and tribes, and also impacts to recreation. Specifically, the DEIS grossly understates the issue of over-appropriation (which already exists) by stating, “[t]otal water consumption by the project would be less than 0.001% of the overall amount of water within the ESPA.”	See responses to comments 1042-14 and 10426-2 (see both in Table A-3z, Water and Wetland Resources).
11535-130	Steven Andersen	The DEIS fails to adequately account for the type and number of domestic wells in the area and the range of potential impacts to wells and water supply caused by blasting. Further, the geology of the area where blasting is to occur has not been adequately studied. The DEIS fails to account for the propensity of blasting to cause uncontrolled leaks from the canal due to cracks and fissures in lava tubes and vents. There is also a risk that blasting can introduce contamination into domestic wells, particularly given the porous nature of the rock and lava bed, which occurred when blasting occurred near Kimberly, Idaho in 2007.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11535-131	Steven Andersen	Finally, the DEIS grossly misrepresents the state of water storage when it boldly claims, “volume of water stored in the aquifer is so large that the effects would not be substantial.”381 All of the water that flows out of the aquifer and into the Snake River already has valid water rights against it, i.e., resulting in over-appropriation. The agency fails to consider these competing rights, which would necessarily require mining the aquifer with very deep wells, deeper than the outflow elevations of the discharge springs of the ESPA. In short, the DEIS fails substantially to account for and mitigate the impacts to the aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11535-132	Steven Andersen	The DEIS fails to adequately address and provide mitigation for adverse impacts to water resources. Indeed, there has been no thorough or thoughtful consideration at all. The DEIS states, “MVE would complete site-specific wetland surveys once an alternative is selected and the final design is complete. Based on the U.S. Army Corps of Engineers’ (USACE’s) jurisdictional determination at that time, final acres of wetland impacts may be less than those described in this EIS because final project siting would avoid wetlands to the extent practicable.” 382 This raises two glaring concerns: (1) there has been no meaningful survey conducted; and (2) the location of the turbines has not yet been determined. Notwithstanding the foregoing admissions, the DEIS boldly claims, “effects are not expected to be substantial.”383 Given the perplexing inadequacies, it is apparent the DEIS failed to take a hard look at wetlands and surface waters. Even the proposed design features do not adequately protect water resources because they are not presented in a way that demonstrates how specific water quality targets would be met. Specifically, the features fail to discuss performance goals, including water quality standards, physical site constraints, and fail to evaluate effectiveness of proposed best management practices relative to target pollutants.384 In short, the DEIS fails substantially in its obligation to thoroughly review impacts to wetlands and surface waters.	As stated in Section 3.1.2.2 (Tiering to the 2005 Programmatic Wind Environmental Impact Statement), the EIS tiers to (BLM (2005a), including the implementation of BMPs for wind energy development on BLM public lands. The effectiveness of these BMPs is analyzed in BLM (2005a), and the BMPs are included in Appendix A of the ROD – Implementation of BLM (2005b). To receive a Section 404 permit from the USACE, the project would have to meet national water resource standards. BMPs, including those for erosion controls related to water quality, would have to comply with county, state, and federal standards. See also AIB-48 in EIS Appendix 3: How would the project affect surface water quality through stormwater runoff or disruption of soils and sediments?

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11535-159	Steven Andersen	The DEIS fails to identify which sections of the Clean Water Act may influence construction and maintenance of the project, including but not limited to, Sections 301, 303(d), 302, 303, 319, 402, 402 and 404. A Clean Water Act Section 404 permit is presumably required for this project, but the DEIS fails to clarify exactly what EPA authority and review responsibilities the EPA will have.	The project would comply with sections of the CWA deemed necessary by the USACE, EPA, and IDEQ. EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies) lists the major relevant agency actions and authorities that must be obtained or considered for the project. The relevant actions and authorities provided in this appendix are not meant to be comprehensive.
11535-160	Steven Andersen	The DEIS fails to adequately explore the potential to exacerbate the exceedance of water quality standards through construction surface disturbance, and operation and maintenance activities.	Potential effects to groundwater quality are addressed in EIS Section 3.17.3 (Groundwater Quality). Potential effects to surface water quality are addressed in EIS Appendix 3, AIB-47, AIB-48, and AIB-49.
11535-161	Steven Andersen	The DEIS does not contain sufficient information to determine if any action alternative could be the Least Environmentally Damaging Practicable Alternative to be permitted under Section 404 of the Clean Water Act.	As described in EIS Section 3.17.4 (Wetlands and Surface Waters), the EIS analysis overestimates impacts to wetlands and waters. The overestimation applies to all action alternatives and thus the EIS provides an effective comparison of alternatives (see EIS Table 3.17-13 [Ground Disturbance in Wetland and Waters by Action Alternative]).
11535-162	Steven Andersen	The project would cause direct impacts on water resources by localized alteration of hydrology and indirect impacts on water quality. The engineering for the project has not even been completed, and the DEIS is relying on MVE's hydrogeologic analysis from 2021, relying completely on groundwater for the duration of the project. The quantity of groundwater needed is unknown. There is insufficient analysis of project-related erosion or a plan for how sedimentation into streams will be addressed. The DEIS also fails to adequately account for impacts due to blasting and hazardous materials contamination.	In response to public comments, MVE updated the anticipated water use for the project, as documented in EIS Section 2 (Proposed Action and Alternatives), EIS Section 3.17.1 (Groundwater Quantity), and MVE (2023). See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources) for information related to impacts related to blasting. EIS Section 3.17.4 (Wetlands and Surface Waters) describes impacts to surface water quality, as does EIS Appendix 3, AIB-47, AIB-48, and AIB-49.
11535-163	Steven Andersen	The DEIS also fails to analyze if construction activities and impacts on groundwater resources for public drinking water would comply with The Safe Drinking Water Act.	See response to comment 11535-159 (see in Table A-3z, Water and Wetland Resources).
11535-164	Steven Andersen	The DEIS presents a Wetlands and Waters Desktop Assessment based on public data sources, and the assessment itself repeatedly recommends that field data be collected and field verification occur for accurate results. The Aquatic Resources Inventory Report – performed by MVE's paid contractor, WEST, occurred in dry conditions and was not comprehensive. An objective, comprehensive field survey of all water wells and springs in potential blasting zones needs to be performed, after engineering occurs, identifying consequences of disturbance, and a comprehensive contamination plan presented for public evaluation.	As described in EIS Section 3.17.4 (Wetlands and Surface Waters), final wetland surveys and resulting micrositing would determine if a CWA Section 404 permit is required for the project. If an Individual Permit is needed, a public comment period would be required. See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources) for more information about existing wells near the project.
11547-1	Lowell Ihler, Carol Ihler	1. The aquifer was not adequately address in the DEIS. There have not been studies done to know how the blasting needed to erect up to 400 wind turbines 700 feet tall would affect the land and the aquifer substructure. This is a very porous area as demonstrated by the recharge ponds and loss of water from the canal system . Also, the weight of the massive concrete base and the turbines on this area is a concern. Once the aquifer is damaged, there would be no restoring it!This isn't something that LS Power could mitigate with money. Even the slightest damage could cause wells to go dry and or contaminate the water system for many communities and farms that depend on this water source.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11552-2	Summer Osmond	It is unstated what the amount of water that the company's construction will require, and where this water will be found. Is the Magic Valley Energy LLC also applying for water rights for the construction phase as well as the postconstruction fire abatement? If not, where will this water be found and used come from? Even during the construction phase, they mention the use of water to dig through the rocky ground to install the bases for the wind towers. Where will this tremendous amount of water come from? There are no specific details listed for any of their planned water uses as to how they plan to acquire those waters. In an area of this size, 140,000 acres, this will require adaptation to the land management plans, travel management plans, fire management plans, in addition to required changes to grazing, recreation, realty, hydrology, archaeology, and mining as well. The risk of potential poisoning and contamination of our aquifer, as well as local water sites cannot be ignored.	See responses to comments 1042-14 and 10426-2 (see both in Table A-3z, Water and Wetland Resources).
11554-2	Raul Labrador; Idaho Attorney General's Office	Our Constitution creates a system of "dual sovereignty." Printz v. United States, 521 U.S. 898, 918 (cleaned up). When the States entered the Union, they "retained a residuary and inviolable sovereignty." Id. at 919 (quoting The Federalist No. 39 (J. Madison)). One of the states' retained powers is the right to hold title over all non-navigable waters. United States v. Utah, 283 U.S. 64, 75 (1931). The States have had a "traditional and primary power over . . . water use." Solid Waste Agency of Northern Cook Cnty. v. United States Army Corps of Engineers, 531 U.S. 159, 174 (2001) (SWANCC); see also 33 U.S.C. § 1251(b) ("It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to . . . plan the development and use (including restoration, preservation, and enhancement) of land and water resources"). So the law has long recognized a state's ownership of its waters as "an essential attribute of [its] sovereignty." Idaho v. Coeur d'Alene Tribe of Idaho, 521 U.S. 261, 283 (1997). The draft EIS acknowledges that "all action alternatives" will have "long-term irretrievable impacts on" Idaho's wetlands and surface waters. DEIS at 3-447. Ground disturbance from building and operating the wind farm will "remove or alter wetlands, change their function, change the rate and quantity of runoff from the fill footprint, compact soils, and alter flow patterns." DEIS 3-444. The Project could also pollute Idaho groundwater and surface water through inadvertent spills of hazardous materials, soil disruption. DEIS at 3-442, id. at Appendix 3-17–18. The draft EIS irresponsibly entrusts MVE to mitigate these impacts while at the same time conceding that even perfect compliance with these mitigation measures "would reduce but not eliminate potential impacts to wetlands and waters." DEIS at 3-445. The draft EIS also fails to analyze how these impacts will affect Idaho's sovereign interests over its waters or even acknowledge that Idaho has such an interest.5 And by failing to account for Idaho's sovereign interest in its water, the draft EIS also falls short of the requirements of NEPA and the FLPMA. See Ctr. for Biological Diversity v. Dep't of Interior, 623 F.3d 633, 641 (9th Cir. 2010) (NEPA requires agencies to take "a 'hard look' at the	The State of Idaho is a cooperating agency on the EIS and is aware of the project and its proposed water use needs.

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		environmental consequences of its proposed actions"); see also 43 U.S.C. § 1701(a)(8) (requiring the Bureau to manage public lands in a manner that "will protect the quality of [its] water resource").	
11557-1	Deanna Weigel, Andy Weigel	The Lava Ridge project poses a serious potential threat to waters of the state that comprise the Eastern Snake River Plain Aquifer (ESPA), which is a key element of southwest Idaho's economy. This project puts this resource at risk while providing unsubstantial analysis of potential impacts and understated consequences associated with the risks that have been identified. Water is undoubtedly one of the most precious and vital resources in the state of Idaho. The state has dedicated significant resources over several decades to adjudicate water rights associated with the Snake River and the ESPA. In fact, Idaho has one of the most sophisticated and successful water rights management programs in the Western US. In recent years Idaho has implemented an incredibly effective aquifer management plan, resulting in the first year over year increase to the aquifer storage volume in decades. Too many industries and people rely on this resource to put it at risk, let alone without the sort of rigorous and targeted evaluation it deserves. This project must not be approved until the substantial risks it poses to the quality and quantity of the water in the ESPA have been fully vetted and satisfactory mitigation measures have been identified and committed to.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11561-1	Nicki Kroese	I have spent many hours reviewing the EIS for the Lava Ridge Wind project. I am most concerned about the potential for damage to the Snake River Aquifer and the inability to make repairs. If you were to study the history of similar projects you will find numerous problems. Starting with construction this project subjects our groundwater to pollution from oil spills and herbicides. It continues with cancer causing explosives residue blown deeply into the earth. Eventually, motor failures will cause more oil spills. I believe the job of the BLM is to protect and preserve our lands. The Snake River Aquifer is the life blood of the Magic Valley. The EIS is unable to outline mitigation of any damage to the water flows.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources) and EIS Appendix 3, AIB-47: How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality?
11576-1	Kelly Human	I see several short comings in the EIS. It does not give the unique geology, hydrology and aquifer underlying the project the critical attention needed. The aquifer is the size of Lake Erie The Federal Policy and Management act of October 1976 states "The secretary shall prepare and maintain on a continuing basis and inventory of all public lands and their resources and other values" the BLM doesn't have the inventory base it needs to go forward with the EIS at this time. The EIS relies too much on future studies which should be conducted upfront to properly inform the impact section of the EIS. It relies too much on future mitigation analysis agreements, plans and mitigation compensation. The company knows where they want to locate towers, battery sites, roads, powerlines etc. perhaps some trust drilling would be in order first to help inform the blasting plan and answer the questions like what are the potential impacts of blasting on the aquifer, surrounding wells and existing water rights. What are the potential impacts to the Northside Canal and laterals the Gooding Milner Canal and its laterals? The major conduits of irrigation water supplying hundreds of thousands of acres of farmland didn't even show up on the EIS Mabs. No discussion was offered of the potential significant impacts from blasting adjacent to the structures could they be breached or undermined?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11598-20	Idaho Conservation League	Impacts of construction on groundwater Given that this project is proposed over the Eastern Snake Plain Aquifer (ESPA), a sole-source aquifer that provides drinking water for nearly 300,000 people, the BLM should place extra scrutiny on the project's potential impacts to groundwater, both in terms of water quality and quantity. The project proponent should be required to use industry-leading best management practices with regards to preventing potential groundwater contamination. The project proponent should also be required to take all reasonable steps to minimize their water usage, and accordingly, their withdrawals from the ESPA. This project should also include regular monitoring of a geographically representative suite of existing wells across the project area to screen for impacts to water quality and/or quality as the project progresses (if approved). Mechanisms should be put in place to notify the BLM and Idaho DEQ of any exceedances of Idaho's groundwater quality standards and require corrective action. A formal groundwater monitoring plan should be included with the FEIS summarizing all of these items (and more). If this project is to move forward, ICL supports the inclusion of Measure bbb, which stipulates: MVE would gain a clear understanding of the local hydrogeology as determined by Idaho Department of Water Resources and the BLM. Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified prior to blasting and excavating. If construction activities near aquifer recharge areas cannot be avoided, they would be closely monitored to reduce the potential for contamination of said aquifer. We further encourage the BLM to include this sort of mitigation measure in future renewable energy projects of this scope and scale that are proposed above the Eastern Snake Plain Aquifer.	As per BLM-Required Measure AA, MVE would be required to monitor groundwater use (EIS Appendix 4 [Mitigation]). Also see response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11605-1	Sheila West	I have examined the EIS and can find no mention of studies on potential damage to the aquifer that lies under the proposed site. Extensive studies need to be made to ensure the aquifer that supplies water to the Magic Valley and areas along the Snake River as far as Boise is not damaged.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11615-8	Spencer Dixon	I do not think the project's effects on our aquifer have been adequately studied.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11627-1	Ruth and Mel Harder	What will the effects of blasting for over 500 days, the non-calculated combined weight estimate of 400 plus gigantic turbines, towers and bases be? The overlaying roof over the aquifer is pourous and fractured. If the blasting collapses the protective cover over the aquifer, what then? Who will be held responsible for contimation? Who will be held responsible for the livelihoods of property owners, families and businesses that rely directly on this life source?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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11640-3	Amber Madsen	We rely on our aquifer to provide clean, life-giving water for not only our citizens, but our farmlands that provide food for us and many parts of the country. The economy and life that is established here is dependent on this water. This area above our aquifer is too valuable to risk with the unknowns. Anyone who has been around any minor explosion would have no doubt that the disruption of the ground with the vast amount of explosions over the extensive timeframe could do no less than compromise the aquifer below. We cannot take that risk.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). See also AIB-34.
11667-1	Alisa Bowman	Concern: The Snake River Plain Aquifer The Snake River Aquifer is central to Southern Idaho's prosperity. If this water becomes contaminated or dries up due to the projected wind farm, it will be detrimental to the livelihood of the area's residents and have a domino effect on the entire state. The Magic Valley is a huge agricultural contributor to the state/nation/world. Agriculture needs water. Who knows what the effect of all of the blasting on the fractured basalt for the DEEP foundations and construction of the towers will have on the water. Towers of this size have never been built before. We will not be a guinea pig for the rest of the world. It is inevitable that the water table would be compromised. How much? We may not know until it is too late! We NEED to PROTECT OUR WATER!	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11723-2	David Robinson	this is not the right area to be blasting over the aquafer then having petroleum leaks seeping through the lava and into our drinking water	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11728-1	Juanita Young	The Snake River aquifer is vital to the economy of Idaho, without it farm lands would disappear. Unless you all are terribly behind the times..we want to support small, local farms, that produce real food…not mega farms that are producing food that is toxic to human beings. The toxic chemical cocktail in the dynamite (ammonia nitrate and diesel) will penetrate the porous lava rock. Our hydrologist said it will penetrate down to the aquifer. Thus making the water unusable by man or beast.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11743-1	Neva McGregor	we believe that the Snake River aquifer is at serious risk if these huge wind turbine's are built over the top of the aquifer. Our son is a geologist and can not believe that no test drilling or seismic testing have been done. This aquifer is the life blood of the entire southern third of Idaho,reaching from Yellow Stone Park west to the Idaho Oregon border. If this aquifer is contaminated or shut off the result would be catastrophic. There could be hundreds of billions of dollars in lost revenues that could never be replaced.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11753-2	Mary Rios	This monstrosity of a project will not only be an eyesore, it could possibly damage our Snake River aquifer, which could cause major issues for the residents of this state, or even the demise of our state's population. Due to the basalt bedrock, this company plans on blasting, two times a day, for a period of 525 days. That is every single day for almost two years. This New York based company claims that it won't damage the aquifer. But how do they, or we, know if this is the case? There is no way of knowing until they start blasting. (The blasting will definitely affect the air quality, as well, for animals and humans.)	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11761-1	Carolyn Firth	The project is located within the Eastern Snake Plain Aquifer (ESPA) Groundwater Management Area. According to the Idaho Department of Water Resources (IDWR), a Groundwater Management Area (GWMA) is all or part of a groundwater basin that may be approaching the conditions of a Critical Groundwater Area (CGWA), which is defined by IDWR as all or part of a groundwater basin that does not have sufficient groundwater to provide a reasonably-safe supply for irrigation or other uses at the current or projected rates of withdrawal. It is my understanding that the electricity generated by the Lava Ridge project will be sold out of state, and not even used in Idaho. So I question why Magic Valley Energy, LLC (MVE) should be allowed to use a limited resource (groundwater) that ultimately does not even benefit Idaho. I also question the estimates provided by MVE about the amount of groundwater that will be used. I think their estimates are much lower than what the actual requirements will be. Groundwater is a very precious resource to the farming economy of Minidoka County, and there has been a steady decline of the aquifer levels over the years. The Environmental Impact Statement (EIS) does not address the possible (and likely) negative effect that widespread blasting will have on groundwater flow paths. There seems to be an assumption that there will be no effect. In addition, the weight of the concrete foundations and the turbines themselves could permanently disrupt groundwater flow paths. Another concern I have is the close vicinity of a portion of the Lava Ridge project to the Milepost 31 ESPA groundwater recharge site. This site has been used very effectively in the past for recharging the aquifer during the winter. Blasting and erecting huge wind turbines could have a negative effect on groundwater flow paths which would disrupt or prevent the recharge that has been so successful in the past. These issues have not been addressed by the EIS.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11776-1	Regina Smith	The water & wetlands section talks about the amount of water that is expected to be used. Page, 3–440. Estimates project will locations would be 1400 to 11600 feet from existing ground water wells. Those numbers translate to slightly over quarter of a mile up to 2 miles. Private landowners are concerned that their water will be depleted temporarily or permanently.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).
11776-3	Regina Smith	Section 3.17.2.1 affected environment. " in the siting corridors, there will be 551 acres of wetlands, and 90 miles of water courses). 551 acres of wetlands and 90 miles of water courses that " ground disturbance would remove or altar wetlands, change their function, change, the rate and quality of run-off from the fill footprint, compact soils, and altar, flow patterns." Page 3–444. There is no discussion on canal crossings	see response to comment 11534-20 (see in Table A-3z, Water and Wetland Resources).
11786-1	Tomie Knight, Frank Knight	Dynamiting for over 500 days, twice a day could put pressures on the aquifer, totally unknown, especially at the depth proposed. There are no guarantees that the aquifer will survive without damage or without contamination.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		Water for numerous cities and towns may be affected. This is a huge cost to the people of our communities that will possibly be negatively impacted by this project.	
11787-2	Representative Jack Nelsen	The proposed area of impact has a layer of cinders below the surface. Repeated blasting in this cinder structure can have an adverse effect on surrounding wells. A local canal company experienced just that while blasting to build a canal. Surrounding domestic wells were damaged and the canal company was given the responsibility of replacing them. LS Power has not addressed how they will respond to that sort of potential damage.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11822-8	Bob & Linda Sojka	My PhD is in soil science. I have significant understanding of a range of water issues. In my opinion the aquifer risk analysis for this project is inadequate, given that the number one natural resource issue has always been and will always be water security for those of us living in Idaho's high desert. The amount of drilling, blasting, concentrated load imposition and structural vibration associated with the development of the wind project and the operation of the turbines over the long term has an unknown potential to collapse, reroute or block flow of water within the expansive underlying layer of fractured basalt of this region with irreparable consequences to the ecosystem and to those who depend on water for agricultural use and the full range of Southern Idaho's water needs for human activity.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11822-9	Bob & Linda Sojka	Many instances of wind turbine failure have resulted in large releases of contaminant chemicals into the surrounding soil with potential transmission into groundwater and the aquifer. This project is not worth putting the Snake River Aquifer at such risk.	See AIB-47 in EIS Appendix 3: How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality?
11822-10	Bob & Linda Sojka	The cursory review of largely outdated and insufficiently use-specific soil surveys assessing water issues in the affected construction area likewise appears inadequate given the unforeseen scope and intensively disruptive nature of the project's combined impacts.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11849-5	Charles Brockway	The EIS does not address the potential effect of sonic or subsonic shocks on the fractured basalt aquifer, and the subsequent potential impact on groundwater well productivity. Wells completed in fractured basalt derive water from sporadic zones of rock fracturing. Fractures can be altered by seismic activity.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11849-7	Charles Brockway	The proposed groundwater usage of 400 acre-feet will be nearly 100% consumptive to the aquifer. The Eastern Snake Plan Aquifer Moratorium prohibits the appropriation of new consumptive groundwater or surface water rights. The proposed volume of water is too large to be covered under water exemptions provided for in Idaho code. The EIS fails to assess how this volume of water will be diverted legally at this location.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
11871-35	WildLands Defense	Playa Biota Ignored Why is there no systematic sampling and analysis of playa biota? The reports state that "a number of isolated freshwater emergent or forested/shrub wetlands were identified in the NWI database, the majority of which are playas". "Forty-six of these features were evaluated during the field survey, sixteen of which met wetland criteria and could provide nesting and foraging habitat for a number of wildlife species. The remaining playas were ephemeral resources which, during periods of heavy rain or snowmelt, may also provide wildlife habitat".	The BBCS (Appendix M in MVE [2023]) briefly summarizes relevant habitat conditions in the siting corridors, including playas and other ephemeral surface waters that may provide habitat for birds and bats when inundated. See the EIS for a description of wildlife associated with these habitats, specifically Sections 3.3.1.1.2 (Bat Populations, Bat Use in the Siting Corridors), 3.3.2.1 (Avian Populations, Affected Environment), 3.3.3.1 (Eagles, Affected Environment), and 3.18.3.1 (Amphibians, Affected Environment). Because of the ephemeral nature of the playas and vernal pools in the siting corridors, wildlife use of these habitats is intermittent, and the results of any effort to systematically survey these habitats would be highly dependent on recent precipitation patterns. Further, because of their ephemeral nature, these surface water features do not provide perennial habitat for any wetland-obligate or aquatic organisms. Therefore, when inundated, these surface water features likely support a similar suite of wildlife species as found elsewhere in the siting corridors. In addition to the EIS sections listed above, descriptions of wildlife that use the siting corridors and the data sources evaluated can also be found in Sections 3.3.4.1 (Greater Sage-Grouse, Affected Environment), 3.11.1.1 (Pollinators, Affected Environment), 3.11.2.1 (St. Anthony Sand Dune Tiger Beetle, Affected Environment), 3.11.3.1 (Monarch Butterfly, Affected Environment), 3.11.4.1 (Bureau of Land Management Special-Status Bumble Bees, Affected Environment), 3.18.1.1 (Wildlife Movement, Affected Environment), 3.18.2.1 (Big Game Habitats and Populations, Affected Environment), and 3.18.4.1 (Pygmy Rabbit, Affected Environment). The BLM special-status plant surveys, including targeted surveys of a subset of the ephemeral surface water features in the siting corridors, are described in EIS Section 3.15.3.1 (BLM Special-Status Plants, Affected Environment).
11871-36	WildLands Defense	Bureau of Reclamation Withdrawal Why is there no discussion of the Bureau of Reclamation withdrawal? Three irrigation canals are near the Lava Ridge siting corridors: the Milner- Gooding Canal, Dietrich Main Canal, and North Side Main Canal. These canals are within existing ROWs on federal, state, and private lands. Even though canals are mentioned in the alternatives comparisons, there is no hard look analysis of biological, geological and other impacts of this massive development. Due to the proximity of several canal features, this area may be a magnet for migrating birds, insects and bats that will suffer mortality. Blasting and other intensive disturbance may create fissures in underlying strata that impact canals and water features.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11871-69	WildLands Defense	Wetlands https://eplanning.blm.gov/public_projects/2013782/200493266/20072201/250078383/210211%20Lava%20Ridge%20Wetlands%20and%20Waters%20Assessment_508%20Final.pdf There is no information on wetland animal surveys – for example, for fairy shrimp. There is no information on insects despite mention of Tiger beetles in the EIS.	Table App3-5 was added to EIS Appendix 3 (Issues Analyzed in Brief) to address aquatic species not analyzed in detail.

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		Maps – Vol 2b – has no maps – BLM claims maps will be provided prior to construction. This is NOT adequate - a SEIS must be prepared.	
11881-9	Barbara Browning	Excessive water use, depleting aquifer Olmstead said that after 22 years working on water issues, he didn't think there was room for any new withdrawals from the aquifer, which he said has been declining since the 1960s. The construction of the concrete pads, roads, and elements of dirt work will require 130 million gallons of water, drawn from six new wells. The use of water has raised concerns that other users access to water might be diminished.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2.2 (Groundwater Quantity, Environmental Consequences) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
11909-1	Kevin Trainor	Depletion of the aquifer to build the project. (I have not seen a number for how many cubic ft of water it will take for construction of the concrete foundations , nor whose water right will be used for that)	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources).
11909-2	Kevin Trainor	Nor have I seen any estimate of what the depletion to the aquifer will be. How many wells will have to be deepened (and how far) during the construction and after completion. The Snake River Aquifer is basically a perched aquifer fed by mountain snow runoff. A fracture of the basalt floor of the aquifer by all the blasting could cause a loss of a lot of the aquifer water.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11911-2	Eila Olmstead	Additionally, the DEIS is lacking in critical attention and detailed analysis of the aquifer and its unique geology/hydrology and the fact that it is a sole source aquifer for our region. How will the blasting impact our aquifer, canals/laterals in close proximity, existing wells nearby. In a similar vein, the water rights requires for the project have not been secured. And since the Eastern Snake River Aquifer has already been fully allocated, any water rights will be at the expense of existing users (drying up existing farmland). If this is the case the DEIS needs to address the impacts of a loss of farmland on our area/citizens/businesses where the economy is largely based off of agriculture.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11915-7	Kim Peyman	We have been reassured by this wind farm company that they will not damage, nor deplete our aquifer because it constantly replenishes itself. Their piling holes will not be drilled so deep as to pierce through into the aquifer. Another ploy to elicit our cooperation? While this may be true, we cannot discount the enormous amount of water that will be required to build these towers and continue to maintain them. A few of the proposals require water in the billions-of-gallons, with the other options not too far behind in their demands. How many farmers and ranchers do you know that want to give their water away? Our neighbors may be, whether they want to or not because this company intends on drilling three new wells into our aquifer to "supplement" their water needs. I am unaware if they are offering any compensation or not for the water they take. Proceed with caution here! Water is a limited resource here in the desert, and we can barely make it through irrigation season right now. Imagine what it might be like if we allow their wells to be drilled. What if our farming and ranching neighbors lose their pivot wells? What if all of our domestic wells run dry? What then? Will this company pay to have our pivot and private wells deepened or re-drilled elsewhere? Would this even help in this case? I pray my 410-foot-deep domestic well will survive the invasion. I do not even want to think about the ramifications of our aquifer becoming contaminated. More than likely, as with most conglomerate companies, they would weasel their way out of responsibility claiming they were not at fault due to some technicality. Ultimately, we will be the ones left holding the empty bag, or aquifer in this case.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11920-1	Liesl Schernthanner	In addition, several of the proposed turbines would be located adjacent to seasonal wetlands and watering areas, further impacting wildlife and causing environmental damage.	Impacts to wetlands are described in EIS Section 3.17.4.
11926-1	Name Not Provided, Susan Jesser	Need to protect the Eastern Snake River Plain Aquifer: damage to our water supply with the project using up to 98,650,000 gallons of water during construction alone would take water needed for farming, ranching and wildlife, danger of added weight from 400 wind turbines with 740 feet tall and 7 substations on the lava bedrock/aquifer and blasting destruction to the aquifer	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11943-7	Mary Kevan	They also require frequent maintenance, leak oil and will interfere with the local groundwater.	See AIB-47 in EIS Appendix 3: How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality?
11962-2	Cassie Christensen, Tyler Christensen	The biggest concerning factor in this project will be the water. Clean water is becoming scarcer with every economic event. It is one of our most valuable resource, even though we don't always look at it that way, coming from an area where we are spoiled with great drinking water and most years, we have plenty of water to grow our crops and still pass it down the line. However, our aquifer is becoming more and more fragile and it is unsure of the damage that will be created from blasting, or the vibration on the Earth from the solid base of concrete molded into it in 400 concrete bases. These concrete bases are not even sure in size yet due to the fact that they have never been made before. This fact alone should be enough to stop this proposition to build on the BLM. The concrete bases will inhibit the Earths natural mechanics of allowing water back into the soil. The destruction of our ecosystem will greatly impact this area and I will have more information on that topic in my Carbon Exchange letter. It is also terrifying to think of the Blasting that will take place over our aquifer. 5The Snake River Basin supports most of the Idaho's agriculture and is home to eight of the ten most populated cities in the state. In order to erect on the scale that needs to be done in order to get the windmills erected, we could detrimentally affect our aquifer which provides 889,000 acres of water to farmlands which provide the food we need for our country. The irreversible damage that could be done to Southern Idaho would greatly impact the entire United States. 6When we look at history, the Great Plains has still not recovered from the impacts of the dust bowl that happened more than 50 years ago. Our deserts are fragile and we are in a constant struggle with	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		run off. Once our topsoil is depleted, we will become nonexistent due to the destruction of our ecosystem. The more we can protect the undeveloped lands the better chance we give our future. I have lived in multiple states and traveled all over the United States, Idaho is one state that has it all. We have a great water supply which we can control, most days are sunny and most of our energy is sustainably sourced from hydroelectricity. These things make us a powerhouse for growing crops and creating a strong economy. The risk of something happening to our aquifer seems like it outweighs the reward. Our water supply could easily become tainted from blasting or bedrock shearing from the vibration of the windmills. [...] If you travel through the area North of the proposed site there are several natural hot springs, some of them that are too hot to touch, isn't that a good indication of how fragile our Earth truly is? It doesn't seem fragile because of its vastness, but the synergism between all creatures and their habitat has only lightly been understood. I have personally walked through caves that look like just a hole in the ground but once you get in, there are larger than a house. Will these be protected? How will the local community be compensated if they all need to drill new wells due to depth changes in the aquifer? What about a filtration system if the water becomes tainted from blasting? This area in the Magic Valley is full of farms, dairies and ranches. What will we do if our water source is decimated? No amount of money in the world will help us recover.	
11968-6	Cheryl Sandy	Blasting and drilling may negatively Impact our Aquafir which could be irreparable.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11979-2	Louisa Gauger	To date you have done a really good job at management. However, this project will decimate the whole area, and destroy our economy in the state of Idaho as the blasting that will take place will destroy our aquifer, which in turn will destroy our ag-based economy. I refer you to a study done in the 80s on the damage done to another aquifer. Without water everything dies. Please think long range on this. If they want to place wind farms on public lands (or even private lands) it should not be on top of fragile, lava based aquifers.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11991-6	Julie Abo	I am concerned about two blasts per day during construction, especially if construction is predicted to take two years. I'm concerned about the long lasting effects on wildlife and the Snake River Aquifer. See "Blasting Alternative C Blasting - 2 blasts/day construction; Alternative E Blasting 2 blasts/day construction (page 2-6). This blasting would cause irreparable damage that could not be reclaimed. Water Usage Can Southern Idaho afford to divert this much of their groundwater? DEIS page 2-6: "Groundwater wells Alternative C Water use 5 construction; 4 remain open during operation and decommissioning; Alternative E Water use 4 construction; 4 remain open during operation and decommissioning. I am concerned about the Snake River Aquifer, "The ESPA is the largest aquifer in Idaho and a truly priceless resource (ICL 2021 Groundwater Report," which runs underground directly under the area where the Lava Ridge Wind Project is proposed. In its 2021 Groundwater Report, The Idaho Conservation League has observed that "For decades, water in the Snake River, its tributaries, and its aquifer has been polluted and overdrawn, resulting in poor water quality and declining flows." Furthermore, has there been testing to decide if the groundwater will be protected from further contamination?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12004-2	Douglas Miller	Each of the build alternatives is projected to use an enormous and unsustainable amount of water. This water belongs in the Snake River Aquifer and, if not diverted for Lava Ridge, would make its way into the Snake River. Analysis of more than 100 years of stream flow data for the Snake River at King Hill provided by the United States Geological Survey (see https://waterdata.usgs.gov) shows that the build alternatives will use 82% - 117% of the median daily stream flow in the Snake River. Lava Ridge would thus effectively dewater the Snake River for a day; the consequences would be disastrous for the environment and and economy. Therefore it must be concluded that the only viable option is Alternative A "No Build."	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12057-3	A. Ben Crouch	5. The effects construction will have on a very sensitive and life-sustaining aquifer, specifically the dynamiting and blasting of over 400 tower locations directly over said aquifer. What kind of damage will drilling and blasting, all that extensive concrete work, and vehicle traffic have on the aquifer? No one – absolutely no one has gone on record to unequivocally say that if will not damage the aquifer. If the project does go through, what kind of reparations could ever take care of potentially irreversible damages?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12057-4	A. Ben Crouch	6. What about the irreparable damage of a possible 30-year period of leaking oil and lubricants from 400 wind turbines contaminating the ground, aquifer, and ground water?	See AIB-47 in EIS Appendix 3: How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality?
12059-3	Martin Bender	I am concerned about potential damage to the Magic Valley aquifer by the Lava Ridge Wind Project, as everyone (from urban residents to farmers and ranchers) depends on the water in the aquifer. The reason I bring up the aquifer is that it has been reported that if Lava Ridge is to go ahead there will be significant blasting around the aquifer to make way for construction, which could damage the aquifer (to say nothing of the colossal water requirements for laying down the foundations of each turbine, which according to the Idaho Conservation Blog is "21,600 gallons of water"[3]). A parting thought on the aquifer; none of the sources I have read do mention what sort of aid or restitution the Magic Valley can expect if the aquifer is damaged as a result of the Lava Ridge Wind Project. Though considering how the train derailments around East Palestine, Ohio, have been handled, I feel that if such a similar situation were to happen in Idaho, we can expect little to no help	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12065-1	Donna Zuck	Construction of the Lava Ridge Project will result in the destruction of the native soils and plant growth due to earth moving, blasting, and placement of concrete footings- which will not be removed after the life of the facility, just buried. The DEIS reports (see page 3-52) the area analyzed in the study is located in the Snake River Plains	Fragile soils and impacts to soil from concrete are described in EIS Section 3.13.1 (Soil and Plant Growth Materials). See also response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		Major Land Resource Area and has 80,308 acres classified as "fragile," and 3,814 ares considered "very fragile." According to the study these biological soil crusts have recovery rates of 2000-3000 years. The local area is expected to take 125 years and the DEIS reports some areas would have irreversible damage due to the concrete footings. These chunks of concrete may leech contaminants into the soil continuing the pollution long after the "reclamation" is completed. As water percolates through the soil will this pollution reach the aquifer?	
12090-1	Chris Bender	1. This project will affect our precious aquifer. The Snake River Aquifer supplies water to about one million acres of irrigated land, including 600,000 acres of irrigated agriculture in our high desert plains home. The key word there is "desert". We are often in drought conditions in Southern Idaho. The Lava Ridge project estimated it will require 130 million gallons of water just during the construction phase. As much as we all would like to hope that is a conservative & accurate figure, it could be much more than that, reducing available water sources for the dairies & agricultural businesses located in Southern Idaho, as well as reducing water for the residents. That is assuming the blasting required to construct the Lava Ridge wind project does not outright destroy the aquifer. Parts of the aquifer are already damaged, and no blasting has taken place yet. In the proposal, it is expected to require "an estimated two blasts per day for 525 days is anticipated during construction". ... Reading through the proposals and studies, I did not see any sort of guarantee that our water sources in the aquifer would be safe from blasting, or any sort of restitution or assistance for Southern Idaho if this valuable resource was obliterated.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12123-1	Kelly Kroese	The Lava Ridge EIS fails to adequately address potential damage and mitigation of damage to the Snake River Aquifer. Our aquifer is directly below the Lava Ridge Wind Project area and it will be affected! No one can predict what the effect will be, because there are no projects even remotely comparable to the Lava Ridge Project. Disrupting the ground with that many explosives, in that many locations, for that amount of time can only harm our precious aquifer. Also, vibrations and other disruptions to the area will have an impact on the aquifer as well. There have been recharge projects going on in the same area designation as the Lava Ridge Wind Project for years, so you the BLM know this area is too valuable to the lives of all inhabitants of Southern Idaho to be compromised.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12142-2	Michael Taylor>	It greatly concerns me that this project as it has been proposed does not adequately address the environmental impacts upon the the area involved. The aquifer provides the lifeblood of our valley. I would like to see environmental impact analysis of placing hundreds of these large windmills over the Snake River Aquifer for the next 30 -50 years.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12188-2	Tom and Megan Ashenbrener	Possibly the single most devastating effect is the real possibility of vibration and blasting caused harm to the basalt layers beneath these windmills, and the potential damage to that layering over our Southern Idaho aquifer. We all know the importance of water, and the importance of the aquifer as a storage vessel for that water. This project should be denied on the real and likely basis of permanent damage to our aquifer and the water that is our lifeblood.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12226-3	Ted Deetz	EIS Section AIB46 also states “With these plans and prevention measures in place, the risk of potential impacts to surface and groundwater quality from inadvertent leaks or spills would be low”. Comment: Mitigation does not address the long term damage to the ESPA. They know, BLM knows, elected officials know and the public knows that this project will have long term damaging effects on the ESPA. It always takes years to show up but it always does. I have personally seen this happen in several location with less disturbance to the environment. It is always mitigated by water districts drilling new wells and damming new water ways to be able to mix and blend water to meet standards set by the Safe Drinking Water Act. The PWSD has approximately 50 surface water and groundwater wells to help meet the SDWA standards.	The project would be required to meet local, state, and federal water quality standards, including the implementation of spill plans and prevention measures.
12226-5	Ted Deetz	EIS Section AIB49 also states that “The project would be designed to avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities…these measures are expected to prevent contamination of groundwater from excavation or blasting”. Comment: This statement is admitting that hazardous materials will contaminate the shallow aquifers, but they will try to prevent the contamination from contaminating other shallow aquifers near by. Due to the basalt and lava tubes in the proposed Lava Ridge project, all of these un used shallow aquifers collect the contamination and eventually the contamination will find its way into the ESPA.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12307-28	Dean Dimond	Information missing for effects on perennial and year-round “live” streams,	See response to comment 11491-16 (see in Table A-3z, Water and Wetland Resources).
1232-1	Carolyn Dimond	Our comments on ground water issues found & not found in EIS 3.17.1 pg. 3-433 & EIS Appendix 2 are as follows: We were particularly interested in comments made by Brian Olmstead at a February 2 meeting held in Jerome, where he stated that he had experienced contamination of wells near blasting that was done when building a substation for the Twin Falls Canal Company. After searching the EIS, we could not find where this issue was properly addressed and evaluated. This is of MAJOR concern. Not only was the contamination not properly addressed neither was there any mention of how blasting hundreds of times to build foundations for the turbines could alter or even plug the aquifer—nor were the effects of heavy equipment and trucks traveling excessively over the aquifer and cause vibrations with the probability of ground shifting in the basalt and changing underground water travel and sources. We have personal knowledge of some wells in this area right now	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		showing signs of caving. We suggest that this evidence needs to be addressed and that there is probable changes of devasting consequences to the water that supplies many of our homes,, farms, even our very livelihoods and also having life threatening consequences to underground habitats of the local wildlife.	
12351-4	Julie C Lynn	• Building the project will use huge amounts of Idaho's most precious resource, water.	In response to public comments on the project, MVE updated the anticipated water use for the project, as documented in EIS Section 2 (Proposed Action and Alternatives), EIS Section 3.17.1 (Groundwater Quantity), and MVE (2023).
12371-1	Alan Hansten; Northside Canal Company	the North Side Canal Company ("NSCC"). NSCC is a Carey Act non-profit irrigation company that delivers irrigation water to approximately 2,100 shareholders on approximately 158,000 acres of farmland across Jerome, Gooding, and Elmore Counties. NSCC holds storage and natural flow rights to the Snake River, notably at American Falls Reservoir. The Snake River is hydraulically connected to the Eastern Snake Plain Aquifer (ESPA), and NSCC relies upon the aquifer to help fill its water supplies. NSCC operates and maintains hundreds of miles of canals, laterals and pipelines to deliver irrigation water to its shareholders. The viability of the ESPA is important to NSCC and its continued water delivery operations, including for groundwater recharge at various locations including Wilson Lake and the Wilson Canyon recharge site. The Idaho Department of Water Resources recently issued an amended moratorium order in the fall of 2022, prohibiting further consumptive uses of the ESPA. The BLMS's draft environmental impact statement (EIS) does not evaluate the alternatives and projected water use in light of the existing moratorium. The applicant's projected water uses appear questionable in light of the hundreds of miles of road building and construction activities associated with the proposed wind project.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
12371-2	Alan Hansten; Northside Canal Company	NSCC is particularly concerned about the proposed construction of the Lava Ridge Wind Project, notably the BLM's preferred alternatives (C and E), and the potential impact on the ESPA which in turn could impact surface water supplies to the Snake River. The preferred alternatives propose to construct hundreds of either 3 or 6 MW turbines spanning over 120,000 acres. The alternatives further identify over 400 miles of new access roads. The proposed blasting associated with the turbine pads and access roads is problematic if those activities could negatively impact groundwater flows, including flows in the Near Blackfoot to Minidoka reach. The draft EIS only analyzes the proposed water use by the project, not the negative impacts on the water supply due to construction actions. Given the topography and geology in the project area, with extensive lava flows and rock, it is likely that construction will require extensive blasting and excavation. It does not appear that BLM has given adequate consideration and evaluation of the proposed impacts of such construction on the ESPA in the draft EIS, and whether those activities will impact water supplies to local farmers, including NSCC shareholders and other private water users. If the construction blasting changes aquifer levels or water production in spring resources, NSCC's shareholders and other surface water users will be negatively impacted. NSCC requests the BLM to consider these factors in evaluating which alternative to choose as the preferred one in the final EIS. Further evaluation and investigation of the proposed construction actions and whether or not those will negatively impact the ESPA and hydraulically connected surface water sources like the Snake River should be specifically undertaken by BLM prior to finalizing the EIS.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12398-8	US Environmental Protection Agency	Potential Impacts to Surface Water and Aquatic Resources The project activities may impact water quality and aquatic resources, resulting in removal and alteration of wetlands, changes in their function, runoff from the fill footprint, compact soils, and alteration of flow patterns. Because of these impacts, EPA recommends the FEIS: • Provide information on the most recent EPA-approved Water Quality Standards for the State of Idaho and implications for water quality protection within the analysis area. It will be important for the public to know the State WQS to determine the extent to which this project will impact water quality. The DEIS discusses wetlands and surface water in the project area but does not identify streams, their current water quality status, criteria to meet, and beneficial uses. • Discuss the project impacts analyses and conclusions based on the most recent WQS information. Where WQS are exceeded, it will be important for the FEIS to discuss how impaired waterways will be restored. • Describe the antidegradation considerations in the Idaho Water Quality Standards for surface waters and indicate whether additional actions could be required to reduce or offset impacts from the Project. The DEIS does not currently include information on Idaho antidegradation policies and project compliance with the policies.	See response to comment 11535-159 (see in Table A-3z, Water and Wetland Resources).
12398-9	US Environmental Protection Agency	• Include the most current information regarding the status of the Clean Water Act (CWA) Section 401 certification and Section 404 permit application processes, as well as conditions to protect water quality in the analysis area waterways. The DEIS indicates that there are approximately 551 acres of wetlands and 90 miles of watercourses in the siting corridors; and that work areas disturbance in wetlands will range from 27 to 44 acres and in watercourses from 3 to7 miles. Similarly, infrastructure ground disturbance in wetlands will range between 8 and15 acres and in watercourses between 1 and3 miles.	See response to comment 11535-159 (see in Table A-3z, Water and Wetland Resources).
12398-10	US Environmental Protection Agency	• Include up-to-date information on the National Pollutant Discharge Elimination System permit application processes including measures to protect water quality and development of Storm Water Pollution Prevention Plans, reporting, and monitoring. The DEIS indicates that project construction will disturb an area of more than 1 acre of land, which would subject the project to NPDES permitting requirements for discharges to waters of the United States and accompanying Stormwater Pollution Prevention Plans, as well as best management practices,	See response to comment 11535-159 (see in Table A-3z, Water and Wetland Resources).

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		may be required. • Describe plans to coordinate with Idaho Department of Environmental Quality (IDEQ) and all affected tribes to ensure that state and tribal water resources are protected from impacts associated with activities under the proposed action.	
12398-11	US Environmental Protection Agency	The DEIS indicates that water quality may be adversely affected if the project construction activities (surface pavement, earthwork and grading, excavations, access roads and road improvements, etc.) alter local hydrology such that erosion carries sediment to surface waters and pollutants to local drainages and the underlying aquifer. In addition, land disturbance, material storage, waste and wastewater disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality. The DEIS states that BMPs and mitigation will be used to minimize these impacts. EPA recommends that this aspect of the project be monitored to ensure that water quality is protected.	Through applicant-committed measure 120, MVE would treat and monitor stormwater. The final Stormwater Pollution Prevention Plan (Appendix D in MVE [2023]) will be prepared in accordance with federal, state, and local regulations and approved by the BLM prior to implementation. The Stormwater Pollution Prevention Plan would provide temporary and permanent sediment and erosion control designs and would identify practices to control erosion and sediment and treat and monitor stormwater (where necessary). The BLM's additional project-specific mitigation measure nn would require MVE to develop an Environmental Compliance and Monitoring Program to ensure that environmental conditions are monitored and required mitigation measures are implemented during the construction, operation, and decommissioning phases.
12400-2	Elizabeth Lampert	The EIS does not mention the potential damage or mitigation to the underground aquifer as 400 wind turbine footings would need to be blasted into the rock formation above said acquirer as part of construction. In fact, the EIS does not give the approximate dimensions of a footing to accommodate the wind turbine structure. The EIS does however dimension the height and width of the wind turbine to be between 390 to 740 feet tall. Why not mention the footing size.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12469-8	Mike Telford	The East Snake Plain Aquifer (ESPA) is one on the largest and most productive in the world. It supplies most of the culinary water from Ashton to Glens Ferry. You will get many comments and concerns that the DEIS fails to address and which there is no possible mitigation to the risks to the aquifer, however minimal, associated with Lava Ridge. My Previous comments about the roads also apply to the aquifer. I'm confident you will receive many comments about the aquifer and I urge you to realize that all Aquifer issues demand Alternative A... The ESPA water capacity was increased starting when surface irrigation began in the late 1800's. Water was kept in the irrigation canals throughout the winter for livestock water and for culinary use. These activities filled the aquifer and increased out flow at 1000 springs and other spring discharges. In 1950's Palisades was built and the winter flows stopped. The Aquifer began to be pumped for further development of Agriculture and urban development. Sprinkler irrigation began to expand and increased efficiency of irrigation in the 60, 70, 80, and 90's decreased recharge. Moratoriums and water calls, with resulting laws suit have followed for decades. These disputes continue currently. Pump irrigators have been under severe restrictions and unable to fully irrigate all of their water right acres. There is simply no water for Lava Ridge. Again, leaving Alternative A as the only option... All of this short history and complications of water, is not addressed in the DEIS.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12651-2	Debbie Rutan	I am very concerned about the aquifer system. What damage could be caused by the drilling, use of explosives (stress and shock waves, contamination from chemicals in the explosives), weight of the concrete foundations and turbines, amount of water to be used for project? We have been in a drought for years. water from aquifer supplies water to much of southern Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12685-5	Philip Gossi; Gooding-Lincoln County Farm Bureau	• Water-The lava flow that is present in the area causes uncertain water distribution. Changing a basin's water draw could easily affect current water rights within our already critical water area. A proposed amount of 90-120 million gallon of water to build the project, would also affect the levels in the aquifer.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
12865-2	Regina Smith	During the recent signing of multi-county resolution No. 2023–01. There were several concerns voiced about project impacts on the aquifer. Blasting is a huge concern. This is not addressed. These communities are in the direct path of this project. Drinking water, wells and irrigation are huge concerns. Sources with experience state the aquifer is shallow, meaning, not deep under the surface. Wells can become contaminated or dry up. Well casings can be cracked, contaminated groundwater can seep under houses. These events have happened.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12867-5	Steve Lampert	The EIS does not mention the potential damage or mitigation to the underground aquifer as 400 wind turbine footings would need to be blasted into the rock formation above said acquirer as part of construction. In fact, the EIS does not give the approximate dimensions of a footing to accommodate the wind turbine structure. The EIS does however dimension the height and width of the wind turbine to be between 390 to 740 feet tall. Why not mention the footing size.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12881-1	Nicki Kroese	I am most concerned about the potential for damage to the Snake River Aquifer and the inability to make repairs. If you were to study the history of similar projects you will find numerous problems. Starting with construction this project subjects our groundwater to pollution from oil spills and herbicides. It continues with cancer causing explosives residue blown deeply into the earth. Eventually, motor failures will cause more oil spills. I believe the job of the BLM is to protect and preserve our lands. The Snake River Aquifer is the life blood of the Magic Valley. The EIS is unable to outline mitigation of any damage to the water flows.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12906-1	Lyle Johnstone	Creating hydrologic conduits between two aquifers during foundation excavation and other activities will be avoided. 3.5.5.1.1 EXISTING AND FUTURE TRENDS AND ACTIONS Existing and future trends and actions have likely impacted or would have ongoing impacts on cultural resources in and near the physical APE. Impacts physically altering cultural resources by introducing ground-disturbing activities include trends and actions such	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		as agricultural land use, private property development, livestock grazing and associated infrastructure, motorized access, existing and proposed linear features (e.g., roads, transmission lines, railroads), electrical substations, existing and proposed wind and solar development, irrigation canals, aquifer recharge sites and monitoring wells, ESR and vegetation treatment projects, and existing ROW projects. In addition, linear features with permanent access roads increase the opportunity for motorized access throughout the area, potentially increasing access to sensitive This EIS statement is invalid and makes NO GUARANTEE that the aquifer(s) will be protected! Protection of the Snake River Plain Aquifer (SRPA) is imperative. SRPA provides drinking water to hundreds of thousands of people. Not to mention 2.5 million acres of farm ground is irrigated from this Aquifer; approximately 330,000 dairy cows in Idaho, the majority of them in Gooding and Jerome counties. These dairies must water cows and replacement-heifers everyday with groundwater from Aquifer. As well as many feedlot cattle in the affected area. Page: 3-165 D-1 Magic Valley Energy Reference: Plan of Development: Appendix D	
12913-2	Jeanie Suprise	My main concern is the impacts to the Snake River Aquifer from the blasting and added weight and stress to the lava bedrock which is part of the aquifer and purification ecosystem for south-central Idaho effecting Magic Valley, possibly Treasure Valley & most of Idaho. I feel with no studies on the possible damages that would be caused if loss of water or blockage of aquifer that would effect so many ag businesses, farmers, habitats, cattlemen, ranchers, wildlife, and families if these 700 feet towers are built and damaged done with this 34 year project (2 years to construct, 30 year operation & 2 years to supposedly restore grounds).	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12916-2	Gina Jerke	I don't believe that there will be "minimal to no damage" as stated in the DEIS. All habitat will be adversely affected not to mention the Snake River Aquifer. How will all the blasting/drilling affect our aquifer? What is the real risk of contamination to our water? Will their wells deplete the aquifer and hinder farming?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12922-2	Nikki Engkraf	The Lava Ridge project in particular will negatively impact and greatly threaten our aquifer. Our water resources are used across the lands for our farmers to yield healthy crops. As it is in recent years past they have already experienced a decreased in supply from our inadequate amounts of snow in the winter months. I have heard of a few local farmers in Lincoln County who's wells have already run dry - this means our aquifer is already diminishing with it's current load and should not be unnecessarily impacted any further. My house, my neighbors houses, and my parent house in Twin Falls County all run off of a wells - if our wells run dry as an effect of this project, who bears the expense to drill the well deeper to restore our water use? Same question poses for all the residents in the rural areas where this project will effect more closely - who will bear the expense of restoring their water? I am saddened to think that many Idaho residents will be left without water and may have to leave their generational homesteads because they can't afford to restore it themselves.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12927-2	John Arkoosh	The Snake River Plain Aquifer and the canal systems are the life blood of our valley and our state. The DEIS does not adequately evaluate and address the possible negative impacts to these resources. Turbines shedding PFAS, as well as oils and other fluids are a contamination concern. Seismic activity due to blasting and turbine vibrations may change or divert water flows, or possibly open fissures allowing contamination or draining canals. An in-depth study of possible effects is a imperative and a bond must be posted by the applicant to assure any damages will be wholly compensated. Such bond would likely need to be capable to cover damages in the hundreds of millions, possibly several billion dollars.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12931-1	Becky Cowger	One of my major concerns is in the building of the extremely tall wind turbines/wind farm being planned above our Snake River Aquifer. Extremely tall wind turbines take up a huge area and tons of concrete for their foundational support plus miles and miles of new roads to access every turbine. LS Power cannot determine nor can they predict what the 525 days of blasting will cause below the surface. LS Power has NOT done their due diligence for the Snake River Aquifer for the Lava Ridge Project.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12935-2	Mary Lou Panatopoulos	Personally, my main concern is for the aquifer, as I expressed to you at the Open House in Shoshone. However, concern for the ranchers, the wildlife, the historic significance of the Hunt Project, the damage to the land in building the roads and pillars are of more than significant concern. I could go on, but won't. How can more wells be drilled when we have been recharging the aquifer for several years now? Allowing more wells does not make any practical sense to me.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12938-2	Paul Kaiser	Our soil is fragile, throughout all of the proposed wind turbine area. These wind turbines are heavy and being placed over our aquifer would severely damage it. Below the surface are thousands of cracks, lava tubes, and delicate/fragile soils,with basalt rock, sinkholes, the possibility of ruining our aquifer is of great concern to me. Blasting: as per 3.2 of the EIS. It is a known fact that this much blasting which will be twice a day for 525 days is in excess of what the land can sustain. The force of this blasting is known to send shock waves through the soil. As per Brian Olmstead's comments in the Northside Journal, dated March 2023 section B page 13. The Twin Falls Canal Co blasted for the Midway power plant south of Kimberly in 2007, every domestic well within three quarters of a mile was contaminated with coliform bacteria. Twin Falls Canal Company immediately drilled new deeper wells, with more casings, and were able to restore pure water to these residents. According to the same article "will all of these mega blasts for the construction open any leaks in the nearby Milner Gooding canal? In the early1900's when the canals were blasted they had to seal humderds of leaks for many years in order to get the water to the thirsty crops. According to the EIS LS power and Magic Valley energy will not be responsible for damage to wells or aquafer and quite frankly once the damage is done it will never be able to be repaired.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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12948-1	Jim Peyman	I don't know where they think they're going to get the water they'll need without screwing someone over. Taking someone's water Out West can get you killed! Average water well depths around here are 250-300 feet deep. A 700-foot-tall wind tower erected using pilings would have to be drilled to a depth of around 350 feet deep. Where do you think the bottom of the hole will end up? I would hate to think of the consequences if the aquifer is contaminated. Blasting over our aquifer without really knowing the short- and long-term effects is absurd!	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12949-2	Ralph Kincheloe, Connie Kincheloe	In Twin Falls County, blasting to remove rock to work on the canal impacted wells within a 3/4 mile radius of the area. The canal company was forced to re-drill every well for the homes/farms in that area. We live over the largest single source aquifer in the United States. It stretches from Wyoming to Mountain Home, Idaho, and even down in to Nevada. https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b In 2015, after years of fighting over precious water and mitigation, water users came to an agreement to protect our water source. https://www.boisestatepublicradio.org/news/2020-07-13/five-years-after-water-rights-agreement-idahos-largest-aquifer-is improving "Aquifers and surface water are drinking water systems that my be impacted by development. The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health." https://www.hudexchange.info/programs/environmental-review/sole-source aquifers/ We understand the value of water and what a precious commodity it is. Any activity above our aquifer that has the potential to damage or contaminate our single source aquifer to a point of irreversible damage should not be allowed. It is the lifeblood of southern Idaho. Given all of this information regarding the blasting that will be required for all of the turbine bases and the roads that will need to be built to accommodate the large turbine blades, we have grave concerns over the possibility of fracturing and contamination of our aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12966-2	Ted Deetz	The only other mention of the effects on the ESPA I could find is in AIB46 and AIB49 and there is no discussion of the long term effects on ESPA.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12966-4	Ted Deetz	EIS Section AI846 also states "With these plans and prevention measures in place, the risk of potential impacts to surface and groundwater quality from inadvertent leaks or spills would be low". Comment: Mitigation does not address the long term damage to the ESPA. They know, SLM knows, elected officials know and the public knows that this project will have long term damaging effects on the ESPA. It always takes years to show up but it always does. I have personally seen this happen in several location with less disturbance to the environment. It is always mitigated by water districts drilling new wells and damming new water ways to be able to mix and blend water to meet standards set by the Safe Drinking Water Act. The PWSD has approximately 50 surface water and groundwater wells to help meet the SDWA standards.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12966-5	Ted Deetz	EIS Section AIB49 states that "Areas of groundwater discharge and recharge and their potential relationships with surface waterbodies shall be identified prior to blasting and excavating. If construction activities near aquifer recharge areas cannot be avoided, they would be closely monitored to reduce the potential for contamination of said aquifer". Comment: Who makes the decision on what cannot be avoided? Contractors always come in and do their thing. MVE has already mapped out over 500 gps coordinates for windmill locations. It is apparent that MVE is already in the "go mode" I have seen this happen on almost all large corporate projects. They always have a PR person on site that is very skilled in the law and very diplomatic. They want to be your best friend and want to buy lunch or what ever.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12966-6	Ted Deetz	EIS Section AIB49 also states that "The project would be designed to avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities... these measures are expected to prevent contamination of groundwater from excavation or blasting". Comment: This statement is admitting that hazardous materials will contaminate the shallow aquifers, but they will try to prevent the contamination from contaminating other shallow aquifers near by. Due to the basalt and lava tubes in the proposed Lava Ridge project, all of these un used shallow aquifers collect the contamination and eventually the contamination will find its way into the ESPA.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
12968-8	Charles Brockway	The EIS does not address the potential effect of sonic or subsonic shocks on the fractured basalt aquifer, and the subsequent potential impact on groundwater well productivity. Wells completed in fractured basalt derive water from sporadic zones of rock fracturing. Fractures can be altered by seismic activity.	Repeat to comment 11849-5 (see in Table A-3z, Water and Wetland Resources). See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Blasting occurs regularly over the ESPA without resulting in sonic shocks.
12968-11	Charles Brockway	The proposed groundwater usage of 400 acre-feet will be nearly 100% consumptive to the aquifer. The Eastern Snake Plan Aquifer Moratorium prohibits the appropriation of new consumptive groundwater or surface water rights. The proposed volume of water is too large to be covered under water exemptions provided for in Idaho code. The EIS fails to assess how this volume of water will be diverted legally at this location.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
12976-3	James Komadina	v. COMMENT - The DEIS is silent on regional and local hydrological issues. MVE has not even conducted a cursory review of existing information as follows: 1. Groundwater Levels I Idaho Department of Water Resources (Serve Idaho) 2. Maps and Spatial Data I Idaho Department of Water Resources (Serve Idaho) Blasting impacts on local aquifers used for agriculture and potable service have not been described in the DEIS. A regional and local structural geological review would focus attention on potential areas of mixing and enable placement of monitoring wells to ensure blasting impacts are properly mitigated. The agency is ignorant of the presence of	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		shallow aquifers and their potential to be impacted without a multi-year baseline hydrological monitoring program having been completed. As such, a review of the adequacy of POD Appendix I is not possible.	
12982-5	Jerry Taylor	The DEIS does not give the unique geology, hydrology, and aquifer underlying the project area the critical attention and detailed analysis that is required. The Eastern Snake River Aquifer (which is roughly the size of Lake Erie, in volume) is contained within and flows through basalt lava formations, primarily. ("Snake River Plain Aquifer", isu.ed). These lava formations are very porous, as a result of gases trapped and released as the extruded lava cooled. The basalt is also highly fractured. Basalt lava is also known for its highly variable porosity, ranging from tiny pores to lava tubes and caverns many yards in diameter. Water in the aquifer flows through lava tubes, fractures and hollows of all sizes and shapes for miles following the path of least resistance, from north to south and east to west, generally. Some lava tubes express at the surface as large caves, or fractured rock outcrops, which provide critical habitat and hibernacula for wildlife, as described in the DEIS. The Eastern Snake River Aquifer has been fully adjudicated for water rights, as of 2014. In 2018, the static water level of the aquifer dropped for the first time, since monitoring began. That is to say, the lowest rechargeable pool was reached and exceeded, with more water being pumped than can be expected to recharge in a given year. In May of 1992, the Idaho Department of Water Resources (IDWR) issued a moratorium on new pumping and diversions within the Eastern Snake aquifer management area, including Basin 37, within which the proposed Lava Ridge Project would exist. In October of 2022, IDWR issued an amended Snake River Basin Moratorium Order, which expanded the reach of the previous moratorium. In December of 2022, IDWR Director., Gary Spackman, issued a "Notice of Final Order Curtailing Ground Water Rights Junior to May 31., 1989; Affirm and Amend Ground Water Rights Curtailment List-Surface Water Coalition Delivery Calf'. This Order clearly lays out that " ... ground water rights junior to May 31, 1989 remain subject to curtailment under the November Shortfall Order." Putting those junior water rights holders on notice that part or all of their water rights may be withheld. The principle of "first in time, first in right" gives deference to senior water right holders. As of the last time I checked with IDWR, MVE or its affiliates currently hold no current water rights in Basin 37. The DEIS says MVE intends to acquire water rights or lease water from the Idaho Water Bank, which, as I understand it, does not have enough water currently available, and MVE would be behind other existing water right holders in priority to secure access to the Water Bank. Since MVE has no current water rights, is unable to secure new water rights Uunior to May 31, 1989) and water rights are necessary to construct and operate the wind farm, why did BLM accept the Rights of Way application in the first place? Why was this EIS process begun? The company might argue that they plan to buy and dry up existing farm land, and transfer sufficient water rights (senior to May 31, 1989) to meet its needs. The problem here is, this would require a change of "Beneficial Use" from agricultural to commercial or industrial, while there are existing agricultural demands that would demand this water. I don't know if this could be done or not, but BLM must consult with IDWR and answer the questions. If valid water rights can't be secured, this project is dead in the water, and there has been a terrible waste of taxpayer dollars. The DEIS should be suspended immediately until MVE acquires necessary water rights. If they do come from the loss of existing farmland, the significant impacts of such acquisition (loss of farmland) should be analyzed in full and upfront.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022). See also AIB-34 "How would the project affect prime and unique farmland or productive soils in the vicinity of the project and how many acres would be affected?"
12982-7	Jerry Taylor	The DEIS gives little attention to potentially significant impacts from blasting, on the unique geology underlying the project area, the hydrological impacts that may occur, the loss of habitat(s), or the potential damage to irrigation structures and/or private wells. Instead, it relies on future mitigation and future plan development (i.e. a "Blasting Plan"), which would enlist the services of a "Blasting Engineer" to craft specific plans, after the final EIS record of decision is issued, on where and how to blast. Why wait? The company knows where it wants to locate towers, battery sites, roads, powerlines, etc. Perhaps some test drilling would be in order first, to help inform the blasting plan and answer questions like: What are the potential impacts of blasting on the aquifer, surrounding wells and valid existing water rights? What are the potential impacts to the Northside Canal and associated irrigation laterals, which provide water to 177,000 acres of farm ground? What about the Milner Gooding Canal and its laterals? These major conduits of irrigation water, supplying hundreds of thousands of acers of farmland, didn't even show up on the DEIS maps! No discussion was offered of the potential significant impacts from blasting adjacent to these structures. Could they be breached or undermined?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13003-3	Lynden Osborne	The Aquifer, the Canal System and Blasting Developers state that blasting will occur for approximately 500 days. In the DEIS there is a section addressing contamination of surface water and ground water. It's interesting that blasting is considered in that scenario, but there is no mention of the potential for blasting to affect the integrity of both the aquifer and the canal system. Have any studies been made regarding this aspect of our water resource? If so, what would mitigation look like? Could the entire west side of the valley be without canal delivered irrigation water for a season or more? Blasting to the extent proposed by the Lava Ridge project developers is worrisome. Especially regarding the project's proximity to one of the main aquifer recharge areas.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13008-6	Scott Hauser	Appendix M, Aquatic Resources (section 2.2), is an explanation of the delineation of wetlands. Though the DEIS states in multiple places that aquatic resources will be avoided to the greatest extent possible, this still leaves the opportunity for wetlands to be impacted. For example, many of these wetland features are seasonal playas, making it conceivable that this avoidance may not be considered important by the BLM project team. However, due to this being a semi-arid environment, the aquatic resources in this area are of great importance to wildlife. These playas are highly valuable to migrating and breeding bird species that frequent the area. Because this is a semi-arid region, it is vital to protect wetland areas as temperatures continue to increase and have extreme fluctuation periods due to climate change.	The BLM would require that wetlands of all types be avoided to the extent practicable. However, if avoidance of wetlands results in additional impacts to other resources, then the BLM would consider these and may allow unavoidable work in wetlands with specified mitigation measures in place.

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13008-16	Scott Hauser	Further, the use of magnesium chloride or other suitable compounds should be further discussed. There is no evaluation of where or how much of these compounds may be used. There is no mention of restricting their use on water crossings or near wetland areas. USRT strongly supports further exploration into the impacts from dust and options for dust prevention.	See response to comment 3811-4 (in Table A-3v, Soils) and 13012-10.
13012-4	Heather Saunders	As far as the more practical considerations go, let's start with the construction phase of this project. They want to dig how many wells? Water is one of our primary concerns. The Idaho Department of Water Resources stopped granting new well permits last year because the aquifer is already over allocated and is not getting recharged properly. I'm sure the company found a pet hydrologist willing to say whatever they pay him or her to say; Glanbia did the same thing before they fired up their monster well near Richfield back in 2007. And, despite their pet hydrologist's predictions that their project would not affect the local ground water, eleven wells in the area went dry in just the first year. A larger number went dry in the second year. I had to add 100 feet to my own well, which is now located at a depth of 600 feet. The shaft has a bend so it can't be drilled any deeper; if my well goes dry again I'll have to spend $S0-$100K to dig a new one. So I am not thrilled with the idea of any additional drains on the existing aquifer, no matter how temporary.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13012-5	Heather Saunders	The blasting is a concern for every entity that draws water from the aquifer. Basalt is notoriously rigid and the concussive effects of blasting are likely to cause fractures that currently do not exist. While such factures can be beneficial and provide additional areas for underground water storage, the negative effects are a little scary to contemplate. What size are the blasts they plan? How far will the concussive waves travel through basalt? Are we absolutely certain that any fracturing that results from the blasting will not have the negative effect of lowering the level of the aquifer? That could be devastating to both rural and urban areas. ... A study conducted by the New Hampshire Department of Environmental Services ("Rock Blasting and Water Quality; Measures That Can be Taken To Protect Water Quality and Mitigate Impacts") was more suited to my investigation and it describes two ways that blasting can negatively affect groundwater. The first is contamination of groundwater resulting from the release of a regulated or unregulated substance into the ground water. The sheer depth of Idaho's aquifers and the filtering effect of the intervening layers of sand and clay make such a possibility unlikely; however, contamination would still be possible via direction introduction into a well. The more likely problem for this area is agitation of the subsurface that could cause turbidity in groundwater to increase, causing problems and additional expenses for the end users of that water. I have enough ground basalt coming through my water system and I get the added benefit of being forced to replace mechanical elements of my system on a regular basis.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13014-2	Ellis Gooch, Carl Pendleton	As set forth in the EIS Section 3.17.1.2.2., it is estimated that the project will consume approximately 400 acre feet of groundwater and proposes to do so by the construction of six groundwater wells. / The initial failing of the EIS is that it does not mention that on October 21, 2022, the Director of the Idaho Department of Water Resources issued an Amended Snake River Basin Moratorium Order ("Order"). The Order suspends action on the processing and approval of presently pending and new applications for permits to appropriate water from the Snake River upstream from Swan Falls Dam and all surface and groundwater sources. The EIS attempts to minimize the amount of water that would be used in comparison to the total groundwater available in the ESPA. The amount of water that will be used by the project is irrelevant-the moratorium order prohibits the development of new water rights. The Order prevents the project from using new groundwater rights for the purposes described in the EIS. This issue must be considered in light of the fact that there has been a water call made by surface water users against groundwater users on the ESPA, and the matter has been in litigation since 2005.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
13014-3	Ellis Gooch, Carl Pendleton	Further, the EIS minimizes the impact from the development of the project. The project requires blasting and excavation multiple times a day over an almost two year period. The basalt landscape is subject to fracturing resulting from blasting and excavation. The EIS relies upon implementation of the applicant's "committed measures" to minimize ground vibrations or instabilities and claims that the applicant's measures would "reduce potential impact wells, springs, and aquifers during construction". This finding is not supported by the evidence of fracturing that has occurred during other drillings and construction projects in the area. There is a substantial risk that fracturing could lead to degradation of groundwater quality. Despite these issues, the EIS does not provide for mitigation to either the water source for the groundwater pumping or for potential injury to water quality.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13024-3	Keith Stone	Additionally I am worried about our water. This area suffered from a major water call just a few years ago related to the temperature of water being discharged to a downstream water user, a fish hatchery. I worry about the unintended consequence of blasting in the proposed area, and the impact to water clarity and quality to users along the snake river canyon. If water clarity or quality are negatively impacted, a water call could impact farming and livelihood all along the Upper Snake River Basin.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
13026-1	Ruth Dimond	We feel that the impact study for the Lava Ridge Project was not sufficient. The reason this area is called Mafic Valley is because of the water. The North side of the Snake River was brought into production because of the Snake River Aquifer. During the meeting held at the Jerome Airport 2/2/2023, a gentleman spoke up and told us he had worked for the Canal Company. They put a power plant along one of the Laterals. It required blasting to accomplish the project. The blasting changed the flow of water to the domestic wells at several homes in the area. They lost their water. The Canal Company had to drill new wells for those homes. If that comparatively small project had that kind of affect it stands to reason that the amount of blasting it would take for the Lava	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		Ridge Project would be devastating to many more people who are dependent on the Snake River Aquifer for Irrigation and culinary water.	
1470-1	Mryon Huettig	There's a recharge site on the Milner gooding canal just south of the proposed area. Recharging the aquifer is important to the farming community and finding suitable sites isn't easy. Blasting the lava rock in other places along the canals have changed what happens to the wells and water flow in and near the blasting. This could effect the current recharge site we now use. I'm a farmer my whole life south of Hazelton and have deep irrigation wells and have seen changes in the wells over the years.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
1670-2	Vanessa Harper	Idaho has been in a drought, and we don't have the water to be giving away to a project like this. We also do not want any blasting going on anywhere near our aquifer. There is not a one of you who knows what blasting the area will do to the water veins that run to the wells that serve Idahoans and their livelihoods.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
1689-1	Tammy Larson	In order to build these wind turbines there will be a lot of blasting through lava rock. Our aquifer is fragile at best. What is all the blasting going to do to our water supply? I don't see any way for that to not effect the citizens negatively.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
1844-1	Matt Reifer	Please provide me with supporting calculations for how the water use was determined shown in Tabel ES-1.	In response to public comments on the project, MVE updated the anticipated water use for the project, as documented in EIS Section 2 (Proposed Action and Alternatives), EIS Section 3.17.1 (Groundwater Quantity), and MVE (2023).
1975-1	Sue Williams	The DEIS fails to address any protections against potential contamination to the Eastern Snake River Plain Aquifer, which has been designated as a Sole Source (drinking water) aquifer by the Environmental Protection Agency. All of the communities surrounding this proposed development depend on this sole source aquifer for their drinking water. Any contamination of it is unthinkable and unacceptable. The Region 10 of the Environmental Protection Agency, James Robinson, has no record of any application from MVE, or any other entity, applying to build over this designated sole source aquifer. Since this proposed project will be built entirely over the designated sole source aquifer, MVE must make an application to the EPA and comply with all building guidelines and restrictions, as well as all operating and decommissioning guidelines and restrictions, in order to safeguard this critical drinking water source.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Sole source aquifer designations establish a review area where the EPA reviews projects that will both 1) be located within the review area, and 2) receive federal funding. Because the Lava Ridge Wind Project will not receive federal funding, it does not require EPA review.
1990-1	Sharon Rogenmoser	We need to ensure that the aquifer is not adversely impacted. I support wind energy, but not at the risk of impacting water sources.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2074-1	Sue Williams	The DEIS has no map showing an overlay of the domestic and agricultural wells in the area with the locations of each of the 400 wind turbine foundations and other project building foundations. There is no analysis data provided by MVE that the blasting that will be required for these new foundations will have no or minimal impact on the continued water supply of wells in the immediate area. With the proposed foundation sizes estimated at 50-75 ft in diameter and up to 12 ft deep, on a variety of hard basaltic flows, MVE needs to show they have examined this potential impact of the proposed ANFO blasting they will use and what the impact will be on these adjacent wells. BLM needs to require this additional work from MVE and that the results of this additional work be included in a further draft EIS for public comment.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2314-1	Mike Tylka	Blasting. When blasting occurs in the near corridor where I live, we can feel it in the house. Those living near the site will also experience this effect day in and day out. As I am on well water, I have concerns that the amount of blasting could potentially alter the underground flow of water to me and the other residents of Jerome County. It could potentially affect the flow of water to the city of Twin Falls. In addition, continual blasting could introduce potential toxins into the water supply. • Water supply. We do have a finite supply of water in the valley. Even though we have access outside the Magic Valley to a water source, we have to ask. “Why should we allow a significant drain on an existing resource?”	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2572-1	Sue Williams	I have read the DEIS and cannot find a map which dislays the locations of each of the domestic and agricultural wells currently present in and around the proposed 197,000 acre site overlaid by the locations of each of the 400 wind turbines. Would you please provide such a map so that substantive comments can be made prior to the deadline.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2848-1	Kim Browne	My concern is the amount of water that it will need to use - when this area is in a drought and has been for many years. Besides the area is ag-will the blastings & drillings affect the ground water in these areas- all new wells and what they will do to the well tat are already here in these areas.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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2849-1	Lorie Race	My concerns deal with the negative impact of the project on bats, deer & antelope that inhabit our region. Also where in the world would that amount of water come from that is needed for the complete drilling. We live in a desert in the middle of a drought. How will the drilling affect the geology of our waters?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2852-1	Mike Telford	1. The construction of 300+ miles of roads and the super heavy equipment plans. The blasting of these huge, approximately 200' holes will have impacts on all the deep wells in the area. The irrigation wells that are from 150-500' deep are all incased. They go through rock & [indecipherable] filled with water. The slightest disturbance could render them unusable. A very in depth study needs to be done before and of this should be considered. Even then the needs are too great. 2. Our farmland water will drop - nobody will [indecipherable].	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2872-1	Vicki Vandever	I live downriver from the huge, incredible, very pure, aquifer that will run underneath these windmills. With all of the construction that will be taking place to install these windmills. I have concerns about what it will do to the underground aquifer. This concern is only the beginning. These windmills will be running for many years. My bigger concern is what it will do over the years with the constant vibrations that will come from these windmills. Can you guarantee that the aquifer will be unharmed? How can you guarantee that? What kind of study would be able to prove that it would have no effect over many years? How would I know that this study is not biased? I also am concerned about all of the demolition of these windmills and when it would be time to take the windmills down. What effect will this have on the aquifer? This is a very vital aquifer used for various purposes.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2883-1	Gary Cox	The IDWR doesn't have a "clear understanding" of the underground geology of the aquifer. The extent of blasting damage and the impact upon the flow of water through the aquifer is not assessed adequately to justify approval. The unintended consequences of such damage to the underground structure could seriously reduce or eliminate the availability of water to the farms, ranches, dairies, and communities dependent upon their wells to draw state-permitted water from the aquifer. The same concern could be voiced for surface canal water. Blasting the underground rock structure could easily open "sink holes" in the canals where none now exist and the canal water drain into such an opening and be gone forever.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2893-1	Sue Williams	I am against approval of any of the proposed Alternatives for the development of the Lava Ridge wind farm based on the following concern for the lack of an EPA permit for construction on a designated Sole Source aquifer, the Eastern Snake River Plain Aquifer. Contact with Region 10 Environmental Protection Agency - Water Resources Administrator, James Robinson, indicates that no application permit is on file from either MVE or LS Power requesting approval to construct the Lava Ridge wind farm. This permit is required by the EPA because the area in question for the project is directly over the designated Sole Source aquifer, which provides sole source drinking water for Twin Falls, Jerome, Lincoln, and Minidoka Counties. Impacts including initial construction blasting, accidental leaks from the 400 wind turbines of contaminating fluids, structure fires involving the 900 liters of oil contained in the nacelle, and wildland fire suppression efforts are all clear and present contamination dangers to this drinking water source.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Sole source aquifer designations establish a review area where the EPA reviews projects that will both 1) be located within the review area, and 2) receive federal funding. Because the Lava Ridge Wind Project will not receive federal funding, it does not require EPA review.
2894-1	Sue Williams	The DEIS has no map showing the locations of each domestic and agricultural well in the area overlaid with the locations of each of the wind turbine foundations in each Alternative and the foundations of each of the proposed support buildings and roadways. There is no analysis data provided by MVE as to what effect on the local wells all of the blasting required for these new foundations will have on current water production.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2922-1	Nancy Dafty	AIB-49 states MVE would closely monitor to reduce the potential for contamination of said aquifer. Closely monitoring this blast area will not be enough. Damage to our aquifer could happen in a heart beat. If something as far away as Challis can cause damage, what could this blasting do?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
2937-1	Kevin Grey	Appendix 3-17 of the draft EIS speaks too briefly of the possibility of damage to underground water supplies and the measures that will be taken to avoid damaging or contaminating existing aquifers. More disturbing is the absence of a clause of cancellation (or at a minimum, steps for repair/mitigation) should construction of the windmill bases (the necessary blasting, especially) create an adverse situation.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3040-2	Cameron Stauffer	In evaluating the EIS for the Lava Wind Project, it lacks description of what each turbine will take to be constructed. Should there be a concern for springs, canals, and aquifer. The EIS needs to consider in further detail the future and long-term impacts of water in the area. [...] Quality, quantity, and continued use of the water should be looked at further.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3062-2	Kate Lopez	Research should be done to look at the results of extensive, deep well drilling on the aquifer or the damage that fracking has done to the underground environment around those sites. Vast disturbance equal to the drilling for 400 turbines will create an unstable area that has the potential to infect the aquifer and southern Idaho drinking water. LS Power won't help us out of that one. We have to protect ourselves now.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3107-1	Julee Austin	I'm writing to voice my concern about the wells that will be drilled in the Eastern Snake Plain Aquifer for the Lava Ridge project. Over time, according to the EIS (Table ES-1; pg. ES-xi), millions of gallons of water (depending on which Alternative is chosen), will be pumped from these wells, which, in turn, will decrease the water table of	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		the aquifer. Water from the surrounding area will naturally slowly refill the aquifer water table, which will then lower the water table from the surrounding private and public wells in the area. Lava_Ridge_DEIS_V1_ExecSum-Chapters.pdf Referencing the You tube video "How do water wells work": If the water is pumped rapidly, which I'm presuming will happen (due to time constraints), this can create a "cone of depression" around the bottom of the well. This will also lower the water table even more from surrounding wells as it refills the cone of depression. Both of these scenarios will eventually decrease the capacity of the nearby wells, and then the wells further out, and so on. If enough water is pumped over time, the water table can lower permanently, which, in turn, could cause the ground surface to go down over time. The ground surface can go down hundreds of feet over years. https://www.youtube.com/results?search_query=how+do+water+wells+work%3A+concerning+reality None of these problems are noted in the EIS.	
3140-4	Susan Page	Will the constant vibration of the heavy equipment cause contamination to the aquifer system. Who pays for the cleaning of the water? Who will be responsible to repair or replace damages. How can the natural water system be repaired?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3168-2	Lisa Dobra	I would like to know what is the resolution should the aquifer become damaged do to blasting or vibration.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3200-1	Name Not Provided	Since this project is most likely going to have possible effects on the aquifer and ground water are there any plans to require LS power to pay for periodic well testing (weekly, monthly, ?) for every well in the magic valley to test for contamination for the life of the project 30+ years and beyond. Should contamination occur what is the resolution ?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3230-2	Gary Carney	Every single industry in Southern Idaho relies on the aquifer and there may be severe damages to the aquifer. The Snake River Plains aquifer is responsible for millions of acres of farm ground and there are recharge stations throughout this project. This could cause serious loss of crop production. The crop production would decimate our dairy, beef, fish, sugar, potato and other agricultural based industries. There has been very little study done to ensure the safety of the Snake River Plains Aquifer, and the needs to be more due diligence involved.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3302-5	Susan Canham	[...] how do they [turbines] affect the aquifer?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3340-2	Sue Page	The LRWP will be sited directly on top of the fragile Snake River Plains Aquifer. The SRPA supplies water to hundreds of thousands of residents. What impact will 525 days of blasting have on our precious aquifer? What happens if it is irreversibly damaged? How will LS Power mitigate their way out of destroying and/or contaminating the source of our water? Do the humans matter? Will the BLM listen to men like Brian, Terry, and Gar - men that have vast knowledge and experience with water issues and the aquifer? How does MVE account for the discrepancy in their water usage calculations. Those with a water background, have calculated a much greater water usage than MVE has determined. These experts have voiced concerns regarding the aquifer. What happens if private wells are damaged or contaminated? People like Julia and Sergio – whose land and well are near the project site – do their lives and property matter? Is the potential for harm to our source of water the ONE thing that will end the nightmare about to descend upon us?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3349-1	Carolyn Dimond, Harold Dimond	Our comments on canal water issues NOT found in EIS 3.17.1 page 3-433 Through the EIS report we couldn't find even acknowledgement of canal water running through the sitting corridors, let alone issues with canals in amongst the project.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3440-1	Chris Mershon	My biggest concern for this project is the potential damage to the Upper Snake River Plain aquifer with the amount of dynamite which will be used for the excavation process for the footings and foundations for each of the wind turbines. I live in an area where dynamite was used on some of the early development of the Horizon Crest subdivision north of Kimberly, ID. The earliest foundations were set using dynamite to break up rock for the foundation and septic systems. As the development grew, this practice had to stop as several wells were collapsed using this practice. The aquifer is the life blood of southern Idaho. I would recommend additional due diligence from an unbiased 3rd party evaluate this process rather than listen to the politically drive sponsors of this project.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3542-5	Sue Page	Why is the government even considering this plan when the possibility for destruction of the aquifer is a possibility? Idahos way of life should not be put in jeopardy. The sole source aquifer of drinking water for Southern Idaho could be destroyed and water contaminated.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3602-1	Sue Page	The greatest concern, which has not been tested or studied, is the vulnerable of the Snake River Plain Aquifer. The proposed site is on the Snake River Plain which is part of the Volcanic Geographical Axial spanning westward from Yellowstone eastward and known as a Volcanic Hotspot. The sole source of drinking water for Southern Idaho known as the Eastern Snake River Aquifer runs underneath this proposed site and there is no study provided by the EPA or the IDWR that takes into consideration the effects the heavyweight vehicles, equipment vibrations, blasting and digging, and the weight of the foundations and wind turbine will have on the Sole Source Aquifer. This system must be protected.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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3725-5	Jerry Ball	he water needed for this project is also of grave concern. The Eastern Idaho Snake River Aquifer is a gem of Idaho. It provides water for agriculture, homeowners and cities throughout Southern Idaho. However, it is in grave danger. The water table is declining at an estimated amount of 1 to 1 ½ feet per year. Our deep well and homestead wells have declined at these rates for a number of years. Any more water taken from this aquifer will jeopardize Southern Idaho Ag, homeowners and city water supplies.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3768-3	Sue Page	What is the plan for replacing the Snake River Aquifer which is the sole source of water for Southern Idaho. How will that get replaced and who will pay for the damage? The water will be there but will it be able to supply Southern Idaho's needs in its current condition or will and who will be responsible for replacement. How can anyone replace what Mother Nature has created?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3997-2	Angelee Eames	2. The EIS states they will conduct 2 blasts per day for 525 days for the construction. What will happen to the aquifer ? The air? The wildlife? They only state they will try for a 1,000 foot barrier from residences,wells or water bodies.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
3998-3	Sue Page	What will happen to the Sole Source Aquifer? There is no way to repair the destruction of the Aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
4028-1	Sue Page	Lava Ridge Wind Project spreads over the Snake River Plain Aquifer, the sole source of water for Southern Idaho. This project consists of 400 740ft tall turbines with foundations requirements of blasting into the ground 50 to 60 ft deep and 60 ft diameter. Over 2 million pounds of cement and steel. There isn't any study, as of this moment, of how blasting twice a day for a reported 500 days will impact the underground water system we need to survive. This is our sole source of drinking water. To allow this project to move forward could cause irreparable damage to the aquifer system. Stop any further review or consideration of building on this site. We cannot allow the potential of destruction to occur. Sue Page Kimberly Idaho https://www.wind-watch.org/documents/wind-farms-and-groundwater-impacts-a-practice-guide-to-eia-and-planning-considerations/ <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wind-watch.org%2Fdocuments%2Fwind-farms-and-groundwater-impacts-a-practice-guide-to-eia-and-planning-considerations%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Cf76f5b87abad4178ebe208db18e9b863%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638131164349349811%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=qMp27ZuNg5SshP9isc8AcqMGnef%2FmTi84LNgQDMgAKY%3D&reserved=0>	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
4030-1	Julee Austin	RE: GROUNDWATER/WELLS To whom it may concern, I'm writing this letter because I have some serious concerns regarding possible well and aquifer contaminations and complications in and around the project area. The Eastern Snake Aquifer Plain is the lifeblood of the Magic Valley and Eastern Idaho. The water it provides is used for drinking water, irrigation of crops, and for industrial purposes. Damage to or contamination of the aquifer and surrounding wells could have devastating economic, health, and environmental consequences. I see in the EIS MVE's Appendix F & G, that there are plans in place to mitigate health and safety and potential spills. I appreciate the plans and feel that they have been well thought out, but what has not been addressed is what consequences construction can have on groundwater supplies and what remedies are available. According to the Northern Ireland Environment Agency, during different parts of the construction phases, the impacts in groundwater from constructing a windfarm can include changes in groundwater flow and distribution, and reduction in storage. Also, during different parts of the construction phases, there can be impacts from disturbance of contaminated soil and pollution from spills or leaks. https://www.wind-watch.org/documents/wind-farms-and-groundwater-impacts-a-practice-guide-to-eia-and-planning-considerations/#:~:text=Author%3A%20Northern%20Ireland%20Environment%20Agency%20What%20impact%20can,groundwater%20quantity%20and%2For%20the%20established%20groundwater%20flow%20regime. I'm including an example of a story about the Marsh Line Wind Farm in Ontario, Canada (built over an aquifer), where there were numerous problems with nearby wells, and therefore, drinking water. I realize that the geology of their aquifer is different than ours, but the problem is the potential complications were not addressed ahead of time, and now the homeowner is paying the price of this disaster. https://www.groundwatercanada.com/wind-turbines-and-water-wells-opinion-4260/#:~:text=Simply%20stated%2C%20wind%20towers%2C%20for%20generating%20electrical%20power%2C,agreed%20to%20have%20towers%20erected%20on%20their%20land. The plan to build this project over the Eastern Snake Aquifer Plain that serves most of southern Idaho causes great concern for the future of the area. Therefore, I am choosing Alternative A for No Build.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
41-2	Carson Simper, Clement Simper, Rhoda Simper, Lexi Simper	Drilling of wells on public land that can't possibly be monitored to regulate how much water is pumped from them out of an aquifer that is already seriously depleted by drought I find that the EIS from the BLM does not offer enough data to convince me that the blasting will not affect the aquifer underneath. The aquifer is a natural formation that has been untouched for thousands of years. It feeds all of the Magic Valley with ground water. The blasting, and digging by both excavators and bulldozers could disrupt and disturb it in ways that we can't predict. This could potentially have devastating repercussions for thousands of well users throughout the valley.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
4751-2	Joan Hurlock	A second concern regarding the amount and type of blasting that will take place, is how will 525 days of blasting, with a high explosive impact the Snake River Aquifer? According to an attached excerpt from a research paper titled, "The Effects of Seismic Blasting on Shallow Water Wells and Aquifers in Western North Dakota", the author concludes "Significant changes were noted during the experiment and suggest that blasting can have a permanent significant effect on the physical environment of the aquifer ", and "Subjecting an aquifer to extended	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		vibration, which reportedly can be felt at distances over 1 mile, for extended periods of time, may be more harmful that a single blast impulse". Local water experts agree that the aquifer is fragile and can be easily cracked and damaged. How will Magic Valley Energy mitigate the potential permanent damage to the aquifer and the resulting decrease of the water supply? How will the quality of the water be impacted? While the same paper cited above concludes that the quality of the water is temporarily negatively effected, the author also concludes "The breakdown products of explosives and plastics need to be studied to determine if any potentially dangerous compounds are being introduced into the groundwater environment by practices considered by many to be completely benign." How does Magic Valley energy plan to mitigate the potential effects to the quality of the water supplied by the Snake River Aquifer?	
5183-1	Gary Smith	My primary question is since attending the Capital Clarity online yesterday that was streamed from the Idaho Capital, I learned that to install the Lava Ridge Wind Turbines towers that hundreds of holes will have to be blasted into the lava bedrock that is over the Snake River Plain Aquifer. My immediate concern is the stress and damage that this blasting could do to the structure of the Snake River Plain Aquifer. In addition, the 400 plus 740-foot towers that will be placed in those holes could create more stress from wind and weather that could add to potential stress on the lava bedrock and the aquifer below. That aquifer supplies not only the Magic Valley but extends to Boise and Star and the rest of the Treasure Valley. Since there is a possibility of damage to the aquifer, the water flow and purification process I am bringing this to your attention and that of our elected leaders. I believe all the "communities" that use that aquifer for their water and depend on it every day should have been notified and included from the beginning to meet both NEPA and EIS requirements.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5189-2	Traci Wood	I have concerns with the drilling of 6 wells, 4 of which will be permanent. We already have a drought going on. Does this drilling of these wells impact our well systems at our homes?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5213-1	Sue Page	There has not been any study conducted on the effects blasting over twice a day over 500 plus days will have on the Snake River Plain Aquifer, which is the sole source of drinking water for Southern Idaho. No answers to what this effect, on top of the daily heavy equipment driving over the volcanic lava beds or through the towns leading into the construction zones will have on the aquifer or the probable contamination of the water. Please be reminded that this area is also in the Volcanic Geographical Hotspot which runs from Yellowstone westward through this area onward.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5220-1	Susan Jesser	There are many issues with Lava Ridge but today I want to address the Eastern Snake Plain Aquifer. Can you please help me understand how Magic Valley Energy plans to put 400 wind turbines in southern Idaho? I talked to a kind, helpful employee at Idaho Water Resources in Magic Valley and he pointed me to the Idaho government website. There is a map of the Eastern Snake River Plain Aquifer and a plan to protect that water source. Isn't this plan still in place? How can BLM consider not protecting this aquifer? There is no way even the wisest geologist, engineers, etc. (Plus, they are probably on Magic Valley Energy's pay-roll.) can know the issues of blasting, drilling, placing even 40 turbines (not to mention 400) on Lava Ridge could cause. Please tell me the weight of just one of those turbine monsters will weigh? Have you been to Box Canyon? Niagara Springs? Ritter Island? etc. The sparkling, crystal clear water at these locations comes from the Eastern Snake Plain Aquifer. The Executive Summary on page 7 is copied below since the plan is 37 pages. https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fidwr.idaho.gov%2Fwp-content%2Fuploads%2Fsites%2F2%2Fiwrb%2F2008%2F20080129-ESPA-CAMP.pdf&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C7941fd2a79aa47b3632108db20b9b1d6%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638139754158923900%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=0nyWxLymNdJE1dEwPgjjCS1zMrU%2FYYAVUqLw7oLx3h4%3D&reserved=0 "The ESPA region produces approximately 21 percent of all goods and services within the State of Idaho resulting in an estimated value of $10 billion annually. Water is the critical element for this productivity. The Plan establishes a long-term program for managing water supply and demand in the ESPA through a phased approach to implementation, together with an adaptive management process to allow for adjustments or changes in management techniques as implementation proceeds. Due to the inherent complexities in the management and responses of the river and aquifer to water budget changes, a very deliberate choice was made to incrementally implement the various mechanisms proposed in this Plan. The long-term objective of the Plan is to incrementally achieve a net ESPA water budget change of 600 thousand acre-feet (kaf) annually. It is projected that this hydrologic goal can be achieved by the year 2030 through implementation of a mix of management actions including, but not limited to, aquifer recharge, ground-to-surface water conversions, and demand reduction strategies. The Plan sets forth actions which stabilize and improve spring flows, aquifer levels, and river flows across the Eastern Snake Plain. The goal of the Plan is to: "Sustain the economic viability and social and environmental health of the Eastern Snake Plain by adaptively managing a balance between water use and supplies." The objectives of the Plan are to: 1. Increase predictability for water users by managing for a reliable supply. 2. Create alternatives to administrative curtailment. 3. Manage overall demand for water within the Eastern Snake Plain. 4. Increase recharge to the aquifer. 5. Reduce withdrawals from the aquifer. Immediate implementation of the Plan is necessary to achieve the stated goal and objectives. The Plan approaches the 600 kaf target in phases. The Plan Phase I (1–10 years) hydrologic target is a water budget change between 200 kaf and 300 kaf. Phase I includes site-specific implementation actions based on the anticipated hydrologic effect of those actions, as outlined in Section 3.2.1. The water budget adjustment mechanisms include: A. Ground water to surface water conversions. B. Managed aquifer recharge. C. Demand reduction, including: 1. Surface water conservation. 2.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).

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		Crop mix modification in the Aberdeen/ Bingham groundwater district. 3. Buyouts, buy-downs, and/or subordination agreements. 4. Rotating fallowing, dry-year lease agreements, and Conservation Reserve Enhancement Program (CREP) enhancements. D. Pilot weather modification program. E. Minimizing loss of incidental recharge. To ensure that the valuable input of stakeholders continues during the implementation of Phase I and the design and implementation of subsequent phases, this Plan establishes an Implementation Committee. This committee will provide recommendations to the Board concerning Phase I implementation, assessment of Phase I effectiveness, definition of subsequent phases, and coordination of activities necessary for implementation. This committee will also evaluate the effectiveness and viability of continuing Plan implementation during Phase I. The Implementation Committee will include representation, at a minimum, from all interest groups currently represented on the ESPA Advisory Committee."	
5331-3	Joan Hurlock	The LRWP will be sited directly on top of the fragile Snake River Plains Aquifer. The SRPA supplies water to hundreds of thousands of residents. What impact will 525 days of blasting have on our precious aquifer? What happens if it is irreversibly damaged? How will LS Power mitigate their way out of destroying and/or contaminating the source of our water? Do the humans matter? Will the BLM listen to men like Brian, Terry, and Gar - men that have vast knowledge and experience with water issues and the aquifer? How does MVE account for the discrepancy in their water usage calculations. Those with a water background, have calculated a much greater water usage than MVE has determined. These experts have voiced concerns regarding the aquifer. What happens if private wells are damaged or contaminated? People like Julia and Sergio – whose land and well are near the project site – do their lives and property matter? Is the potential for harm to our source of water the ONE thing that will end the nightmare about to descend upon us?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5341-1	Vicki Vandever	I live downriver from the huge, incredible, very pure, aquifer that will run underneath these windmills. With all of the construction that will be taking place to install these windmills. I have concerns about what it will do to the underground aquifer. This concern is only the beginning. These windmills will be running for many years. My bigger concern is what it will do over the years with the constant vibrations that will come from these windmills. Can you guarantee that the aquifer will be unharmed? How can you guarantee that? What kind of study would be able to prove that it would have no effect over many years? How would I know that this study is not biased? I also am concerned about all of the demolition of these windmills and when it would be time to take the windmills down. What effect will this have on the aquifer? This is a very vital aquifer used for various purposes.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5362-1	Harold Dimond, Carolyn Dimond	Our comments on ground water issues found & not found in EIS 3.17.1 pg. 3-433 & EIS Appendix 2 are as follows: We were particularly interested in comments made by Brian Olmstead at a February 2 meeting held in Jerome, where he stated that he had experienced contamination of wells near blasting that was done when building a substation for the Twin Falls Canal Company. After searching the EIS, we could not find where this issue was properly addressed and evaluated. This is of MAJOR concern. Not only was the contamination not properly addressed neither was there any mention of how blasting hundreds of times to build foundations for the turbines could alter or even plug the aquifer—nor were the effects of heavy equipment and trucks traveling excessively over the aquifer and cause vibrations with the probability of ground shifting in the basalt and changing underground water travel and sources. We have personal knowledge of some wells in this area right now showing signs of caving. We suggest that this evidence needs to be addressed and that there is probable changes of devasting consequences to the water that supplies many of our homes,, farms, even our very livelihoods and also having life threatening consequences to underground habitats of the local wildlife.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5441-1	Stephanie Novacek	ow would groundwater withdrawals needed for the project affect groundwater quantity in the area? DEIS pg. 3-441 states “Even if future trends double the demand to the aquifer, the volume of water stored in the aquifer is so large that the effects would not be substantial.” Our aquifer is a finite source of water. The citizens of Magic valley are not willing to play Russian Roulette with our water supply. Why should LS Power be allowed to conduct twice daily blasting that could possibly affect the aquifer? Who is willing to legally testify there would be no damage to the groundwater, the lava tubes or the EISRA? Is LS Power prepared to correct any affected water levels their six wells may have on surrounding established wells, such as deepening or drilling new wells for the land owners? I doubt even LS Power’s bank account could possibly cover the costs of damaging the largest aquifer in the U.S. How would project ground disturbance affect wetlands and surface waters (e.g., streams, canals, and ponds) in the analysis area? The Gooding-Milner Canal had multiple leaking sites that took years to mend. If LS Power affects this water delivery system during the agricultural growing season, will they be ready to pay everyone for crops that would be affected? This could include alfalfa fields that are on 4 -5 year rotation. If a farmer’s first year alfalfa planting is damaged due to irrigation interruption, an 80 acre field could equate to $300,000 payment to one individual.(80acres x 2.5T= 200T x $300((current price))= $60,000 x 5 years = $300,000)	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project’s use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
5820-1	Brian Olmstead	All areas in the aquifer have different percolation rates. IWRB that I am a member of has tried other recharge sites in Lava Rock that will hardly take any water. One of those was near Wendell along the North Side Canal on a lava bed. Mile Post 31 and Wilson Canyon are BY FAR the best recharge sites in the State of Idaho because of the extremely porous nature of the Lava Beds there! The more porous, the more likely contamination. So it is true that ITD or others have blasted in lava rock, and not had a contamination event, or at least not a reported one. In road building you are usually blasting or cutting through a ridge, and filling in a low area. If it were the opposite and the blasting occurred in the same area that a lot of water collects, I contend there would be a much	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		higher likelihood of contamination, depending on how porous the lava they exposed is. Has every blast site in the Lava Ridge area been evaluated for porosity, and runoff collection? Sure doesn't say so in the DEIS	
5821-1	Brian Olmstead	And Just so I mention another flaw in the DEIS: I am confident that hundreds of blasts within 2 miles of the Milner Canal will open new or previously sealed sinkholes that if occur during the summer could certainly cause a crop catastrophe! One other thing I mentioned to you yesterday: During spring melts, like what is happening now, bacteria laden water always collects in low areas that now have soil that filters that water and slowly percolates it into the porous lava strata below. So, if any of the blast areas for tower foundations are in a low area, that same run-off water now instead of collecting and slowly filtering, will travel very rapidly into the aquifer (exactly like MP 31 does) and will carry pollutants with it. Any area like this now becomes in my opinion a new man made recharge site and should require monitoring wells just like ALL of the recharge sites we at IWRB have created above the ESPA! These monitoring wells are very expensive and have to be monitored in perpetuity by IWRB.. the same requirement should apply to the Applicant. The water quality in the ESPA cannot be risked for ANY REASON!	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5882-1	Jeff Juker	Who is going to moniter the water used for construction? We live on an aquifer that has provided the Magic Valley for years. If this project is approved we stand to loose that water. Please consider this among the many other issues	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022). Also, per BLM-required measure AA, MVE would have to monitor water use on project groundwater wells.
5896-7	Mike Tylka	Blasting. When blasting occurs in the near corridor where I live, we can feel it in the house. Those living near the site will also experience this effect day in and day out. As I am on well water, I have concerns that the amount of blasting could potentially alter the underground flow of water to me and the other residents of Jerome County. It could potentially affect the flow of water to the city of Twin Falls. In addition, continual blasting could introduce potential toxins into the water supply.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5896-8	Mike Tylka	Water supply. We do have a finite supply of water in the valley. Even though we have access outside the Magic Valley to a water source, we have to ask. "Why should we allow a significant drain on an existing resource?"	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
5920-3	Kelly Varelmann	I believe most importantly, 500+ days of 2X day underground blasting will most certainly have unknown effects on our already compromised aquifer. Why would the BLM even be considering endangering our aquifer? How will this affect the water supplies of the nearby towns and cities not to mention the irrigation water of the many farms and ranches down the line?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6000-1	Todd Grant	I am very much concerned about the under ground water aquifer system under the wind turbine project. I am very concerned that this could upset the aquifer system through out Idaho.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6032-3	Peter Richardson	The investor-owned utility serving the project area in Southern Idaho, Idaho Power, has significant amounts of coal generation in its resource stack. Idaho Power and PacifiCorp jointly own the Jim Bridger coal plant near Rock Springs, Wyoming. In addition, Idaho Power and NV Energy own equal shares of the North Valmy Coal Plant in Northern Nevada. In total, Idaho Power relies on the Bridger (707 MW) and Valmy (261 MW) coal plants for over 840 MW or about 25% of its capacity needs.8 Coal and gas plants consume tremendous amounts of water to generate electricity. Because Lava Ridge will displace imported power used by Idaho Power (as discussed above) Lava Ridge will actually REDUCE water consumption to the extent that displaced power is currently generated at the power company's coal and gas plants. A good rule of thumb is that any displaced electricity will roughly equal the utility's overall generation mix. In this instance, about one out of every four kilowatts of power displaced by Lava Ridge comes from the company's water consuming behemoths, the Jim Bridger and Valmy Coal Plants.9 According to the Wyoming Water Development Office, the Bridger coal plant consumes (with no return flow whatsoever) approximately 34,000-acre feet of water from the Green River every year. That water is simply evaporated into the atmosphere in one of the Plant's cooling towers. 10 According to the Wyoming Water Development Office, the Jim Bridger Plant is a zero-discharge facility - meaning the water taken from the Green River is lost forever to any further beneficial usage downstream. The Green River is, of course, a major source of water to the upper Colorado River system, which is in the midst of a record shattering drought. The Valmy plant in northern Nevada consumes about 1,500 acre feet of ground water annually. Valmy uses groundwater sources that are pumped from the Humboldt River basin.11 Although the Green River and the Humboldt River are not part of the Snake River/Columbia River drainage system. It is irresponsible to ignore the fact that Lava Ridge will reduce water consumption activities in two drought impacted river basins in the Western US.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
6075-1	Lorinda Grant, Douglas Grant	We are concerned with the damage the blasting may cause to our homes well water and the water we use to water our crops during the farming season. The aquifer is located under the ground that MVE plans to blast for base construction of the turbines. Will this blasting effect that aquifer? Will the water levels change? Is MVE going to cover the cost of us having to dig deeper and/or new wells? Will it contaminate the aquifer that we survive on?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6339-1	Chris Austin	So my biggest concern is the aquifer and water contamination. I'm hearing that the MVE doesn't think the blasting is going to affect the aquifer, but what if it does? We have not discussed this, and I can't imagine how	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		high explosives won't affect it. I strongly believe that we need some guarantees and some alternate plans if it does.	
6354-1	Jean Mollenkopf Moore	The LRWP will be sited directly on top of the fragile Snake River Plains Aquifer. The SRPA supplies water to hundreds of thousands of residents. What impact will 525 days of blasting have on our precious Aquiver? Wells will go dry.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6387-2	AJ Whitecotton	As I am on well water, I have concerns that the amount of blasting could potentially alter the underground flow of water to me and the other residents of Jerome County. It could potentially affect the flow of water to the city of Twin Falls. In addition, continual blasting could introduce potential toxins into the water supply. [...] We do have a finite supply of water in the valley. Even though we have access outside the Magic Valley to a water source, we have to ask. "Why should we allow a significant drain on an existing resource?"	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6511-1	Kelly Varelmann	I believe most importantly, 500+ days of 2X day underground blasting will most certainly have unknown effects on our already compromised aquifer. Why would the BLM even be considering endangering our aquifer? How will this affect the water supplies of the nearby towns and cities not to mention the irrigation water of the many farms and ranches down the line?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6525-1	Mike Miller	Due to water levels in the ESPA dropping , in 2015,and after years of litigation between the Idaho Ground Water Appropriators and the Surface Water Coalition of Magic Valley an agreement was reached to reduce water usage by 240,000 acre ft. and the Magic Valley Coalition agreed to only use water between April1 thru Oct. 31.* Hence this time 2015 , more lawsuits have been filed between the ground water users and the surface irrigators, and junior water right holders have had to curtail irrigation volumes even more.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
6843-3	Charlene Phillips	Regular maintenance of the windmills requires a huge use of two of our limited natural resources----oil and water. As the area is primarily considered as desert, the question becomes "What water rights do they have?:	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
6848-3	Gary Smith	If the applicant, BLM and all agencies involved in this application and decision process cannot demonstrate with certified proof that their blasting and the stress of the wind turbine towers on the lava bed over time will not change the natural aquifer and agree to repair any and all damage to the aquifer if and when discovered then I ask that BLM does not approve this project at Lava Ridge.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6868-3	Barbara Martien	Noted that the following areas were not completely covered. [...] Effect of blasting on aquifer system and the effect on the Snake River. The Snake river is a vital resource to many communities.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6903-7	Todd Wells	-The impact of the development of the proposed project could likely have severe, unknown impacts on the underlying aquifer. Drilling, blasting, and countless loads of heavy traffic has been shown in other areas to negatively impact underlying aquifers.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
6910-4	Public Comments Lincoln County Community Center	I talked to Phil Hummer on the Water Resource Board and I have personally rented water from the water bank; sometimes it's available, sometimes it isn't. Mr. Hummer, I ask him, I says, do we have a lot of water bank water available here? And he said, depends on what part of Idaho you're in. And I mentioned, I says, Lincoln County, Jerome County, and Minidoka County. He says, it is very short here. I said, so if somebody wanted to come in and buy a lot of water rights, would it be available? And he questioned it. He said -- and then I asked, if they are going to drill wells to get their -- I want to make sure I don't get surface water and groundwater mixed up here -- drill wells to get groundwater? He says, we don't want any wells drilled. We'll let them buy water, but we don't want them to drill wells. They're going to drill six wells. This is insane. My well went dry at home, my house well, a few years ago, and a number of others did, also, because the groundwater level went down. So some good meaning farmers in the area said, well -- who were irrigating all of their ground with groundwater, said, we will buy some surface water and irrigate as much crop ground as they can, which amounted to hundreds of acres, if not thousands of acres, and we will use that water instead of pumping groundwater. And that was at great cost to them because they had to put underground pipe in so that they could bring the surface water to irrigate their crops.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
6910-8	Public Comments Lincoln County Community Center	At this farm location, all our irrigation water is from the aquifer, which is deep wells. My residential potable water is also from the aquifer. One of my concerns is with the blasting that will need to take place to secure the windmill bases, that it has the potential to contaminate the groundwater for agriculture use and also for my home. I have concerns over diminishing and depleting the aquifer through the blasting. There hasn't been a sufficient or significant amount of studies done to quantify the effect of blasting to see how it could affect the aquifer, so more time is needed to conduct these studies.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
7330-1	Sue Page	There hasn't been any geophysical on-site testing to determine if the terrain of the Snake River Plain Aquifer is a viable option. The area sits on top of the Volcanic Geographical Axial spanning westward from Yellowstone through Craters of the Moon and further west through Shoshone and Salmon Falls ad onwards. There hasn't been any testing of this Lava strata to prove that blasting with 126,000 pounds of ANFO for 500 plus days at twice a day, just for the foundations, then the actual foundation weight coupled with the turbines and blades.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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		Then the weight of the wind turbine coupled with the vibrations caused by the spinning will go down into the ground and radiate down and outward for how far and wide? Will the constant vibrations cause further fractures in the basalt causing the ground to crush and either contaminate or stop the flow of the aquifer all together? Mitigation clause notes no consideration. So if testing isn't done and the lava fields give way crushing the sole source of water for Southern Idaho how will and who will pay for something that is irreversible and nonreparable?	
7332-1	Gary Smith	I am writing about the Lava Ridge Wind Turbine Project. I live in Star, ID and our city limits border on BLM land and we rely on the Snake River Plain Aquifer that runs under Boise and Star. Any interruption of the water from that aquifer would impact my family my community and many other Idahoans in Treasure Valley and the Magic Valley. I learned that this project sits on top of the Snake River Plain Aquifer that supplies water to both the Magic Valley and the Treasure Valley. The site that is proposed is made of basalt lava flows. This fragile bedrock provides a natural purification system and channeling for the water in the Snake River Plain aquifer. I have also learned that to install these massive towers, that hundreds if not thousands of holes will need to be "blasted" into that lava bed that makes up the aquifer. Blasting fragile material like this and placing 400+ 740-foot wind towers into the lava bed to me does not sound like the best location for a wind turbine farm. In my opinion the continuous stress on these towers from wind and weather and weight over time could, in my opinion lead to damage to the lava bed and the aquifer and its ability to supply water to our communities without interruption or worst total blockage. I am asking my Congressional leaders to investigate how this project could impact the Snake River Plain Aquifer a key part of the Idaho ecosystem and request that BLM deny this application at this location.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
7371-2	Mary Leavitt	Water concerns are at the top of my oppostion list. We worry about our water, and the possiblilty of contamination, reduction of water resources available, and the worst case scenario of the planned seismic blasting of the lava rock creating major problems with the aquifer. Our residential well in Buhl draws from the aquifer. Our irrigation, crops, livestock, power generation, and fish propegation for our Hagerman property all depend on spring water that flows from the lava cliff walls along the Hagerman Valley. Any disruption in the aquifer- be it contamination, reduced flows, etc. will result in catastrophe for us, and THOUSANDS of others in the the Magic Valley. There is insufficiant data in the DEIS to offset these concerns, and frankly there is no liability large enough to cover damages for LS Power/Magic Valley Energy set forth should our water source be negatively impacted.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
7382-2	Diana Nielson	Aquatic Resources Inventory Report is inadequate and mentions very little about seasonal water pooling that is utilized by migratory waterfowl and for natural aquifer recharge. Not a single lake, reservoir or canal mentioned by name for the local community. Our desert is alive because water is such a critical need. Reference from page 13 is data that is seasonal: weather reference in not reliable resource for information for this area, yet is does say it was a below average water year. The Shoshone, Dietrich zip codes refer you to a weather tower in Richfield. Other parts of Hidden Valley refer you to Burley Weather station. Other area Twin Falls.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). As mentioned in EIS Section 3.17 (Water and Wetland Resources), numerous data sources were used in the EIS (the EIS was not limited to Aquatic Resources Inventory Report (WEST 2021)).
7382-3	Diana Nielson	Appendix A page 5 of 39. Why use numbers lay people have a hard time referring to and not add the to the codes regional names that are recognized by locals. The coding is not viewable (that I can find) on your references. The soil maps are difficult to identify an area also. I had to use multiple sources to find the areas. Mule Shoe Lake w-kl-001 w is wetland: above unnamed area is wetland Owinza Butte Lake W KF-002w wetland and it is split into 2 portions Western EcoSystems Technology, Inc. (WEST) 2021. Lava Ridge Waters and Wetland Desktop Screening and Field Survey Methods. T echnical Memorandom. Prepared for Magic Valley Energy, LLC, Chesterfield, Missouri. Prepared by Western EcoSystems Technology, Inc. Laramie, Wyoming. July 6, 2021.	This report was not prepared by the BLM. This report provides background material to the BLM's EIS analysis.
7382-4	Diana Nielson	From Ref Page 13 The page used as reference has error 404 page not available and the data was very old if used. The EPA has new Wetland Rules and Regs. US Army Corps of Engineers (USACE). 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. J. S. Wakeley, R. W. Lichvar, and C. V. Noble, eds. ERDC/EL TR-08-28. Wetlands Regulatory Assistance Program. US Army Engineer Research and Development Center (ERDC), Vicksburg, Mississippi. September 2008. Available online: http:// www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1046489.pdf	See response to comment 7382-3 (see in Table A-3z, Water and Wetland Resources).
7416-1	Sue Page	Part of the Snake River Plain Aquifer is southwest of Lava Ridge and in harms way, as well. Thousand Springs will be destroyed if we allow blasting to occur at Lava Ridge or at any other site in this Snake River Plain. The whole Plain is constructed of gravel, lose sediment and basalt which is what allows the water to freely flow. Please listen to this video and determine for yourselves, how can the fractures not be destroyed by the blasting, heavyweight equipment and the vibrations of these huge beast.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
7612-2	Nathan Thompson	I am concerned about the negative impacts this will have to the wildlife in the area, peoples access to the property, farmers around the proposed area, and importantly the underground water that will most certainly be affected by the blasting that will be required to build this wind farm. I have a well in the area that my family uses for drinking water, and don't trust that my water will not be affected.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

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7757-1	Jana Kaiser	The placement of these wind turbines, the tallest and largest in Idaho and the nation, will be directly over our aquifer. I understand there will be blasting 2 times a day for over 500 days. I recently listened to Brian Olmstead head of Twin Falls Canal Co and with his permission I use his remarks here. The Twin Falls Canal Co blasted a half mile along the canal to install a seasonal hydro power plant on the Low line canal, this was a number of years ago. The blasting resulted in damage to every well within three-quarters of a mile from the blasting. The damage caused by the blasting was taken care of by Twin Falls Canal Co who made repairs to those wells, and bore the financial losses to do what's right by the Idaho citizens. I have neighbors who are taking water samples to be tested to determine a base for the quality of their water today, with the idea that they may need this information in the years to come. I have studied and reviewed the ground water information in the EIS page 3-352 3.13-1. The ground is listed and divided into 19 areas 2 areas are listed as Very Fragile 1 Moderately Fragile and the remaining 15 areas are Fragile. All the features we view above the ground: Wilson cave, Lava fields north of Shoshone, Craters of the Moon, are also found under the ground, lava tubes, caves, rivers, lakes, and they are comprised of basalt from lava flows, and yes this is an extremely fragile soil/rock formation, and it's a fact that this rock is easily changed, eroded and damaged. The blasting materials will be 120 pounds twice a day of high explosive ANFO (ammonium nitrate fuel oil) which produces a shader & destroy effect with shock waves both below and above the ground. The time frame is expected to be 525 days. Provided there are no delays subject to weather and working conditions. The damage blasting will cause will be considerable. However on page 3-441 3.17.1-4 it states: " With the implementation of ground water related applicant-committed measures and other mitigation residual effects in ground water quality are not expected and compensatory mitigation is not proposed." The construction and blasting will create fractures, sinkholes, and increase the aeration of the ground, which will contaminate the groundwater. I find it irresponsible to allow this type of abuse to our public lands, watersheds and aquifer. Along with their irresponsible behavior we the Idaho citizens will suffer from loss of value of our homes, land, and farms. We will bear the cost (if at all possible) of repairing or replacing wells, both domestic and agricultural.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8113-3	Dawn Leiske	We cannot afford to lose our water from haphazard blasting into our aquifer.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8206-3	Sheryl May	We are concerned with the drilling and blasting, and its affect on the aquifer	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8256-4	Sue Page	The brutal attack on top of the Snake River Plain Aquifer blasting for over 500 days using 126,000 pounds of nitrate and fuel oil (ANFO), which is transported by tanker truck and pumped into the holes. When filled with ANFO, a blasthole 400 mm (about 16 inches) in diameter and 7.5 metres (about 25 feet) deep can develop about one billion horsepower.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8376-4	Rachel Espil	Impacts on water? Drought and a vastly growing population are already taking their toll on the water in the region, what will this project do to an increasingly scarce and prized resource?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8421-2	Brian Olmstead	Today I want to talk about how terrible the estimates of water-use are in this totally glossed-over DEIS, and other impacts to the aquifer that are not addressed at all! I worked for Twin Falls Canal Company for 22 years, was General Manager from 2008-2021, and dealt with Eastern Snake Plain Aquifer issues on a daily basis. This aquifer provides at least ½ of the natural flow water used by Magic Valley Farmers every year! The amount of water in the ESPA has been declining steadily for 60+ years now and has reached an absolutely critical level! The State of Idaho and thousands of Idaho water users are spending millions of dollars each year to try to stop this decline and reach a sustainable level of water in the ESPA, because it IS the lifeblood of Idaho! There has been a moratorium on any new irrigation or commercial well drilling on the ESPA for many years now. So, in my opinion, we should not allow even one drop of water to be withdrawn to support this ill-conceived, poorly planned, and wrongly sited project!	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
8421-6	Brian Olmstead	Uncontrolled canal losses during the irrigation season are a BAD thing, and will be a major disaster for thousands of acres of downstream crops! I don't see this in the DEIS either.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8450-2	Sue Page	Lava Ridge Wind Project spreads over the Snake River Plain Aquifer, the sole source of water for Southern Idaho. This project consists of 400 740ft tall turbines with foundations requirements of blasting into the ground 50 to 60 ft deep and 60 ft diameter. Over 2 million pounds of cement and steel. There isn't any study, as of this moment, of how blasting twice a day for a reported 500 days will impact the underground water system we need to survive. This is our sole source of drinking water. To allow this project to move forward could cause irreparable damage to the aquifer system.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8458-4	Sue Page	Structures at Minidoka National Historic Site or the aquifer running underground?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8500-2	Sue Page	There has not been any substantial testing proving the Snake River Plain Aquifer is capable of withstanding the effects of this many 740ft Space Needle sized turbines.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8630-1	Joseph Aitken	Our concern is the lava Ride Wind Project may cause our water well to be reduced in quality and reliability due to the blasting of wind turbine foundations in the hard lava rock area. Any blasting that causes deep lava cracking of the aquifer floor may cause the current floor to diminish and or be lost to new levels below our group.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8642-3	Carl Montgomery	Beyond the issues stated above, water use by the wind farm would be a pull from a vital resource to the area. It may or may not be a substantial amount comparatively, but when considering this project will be in a desert that	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2

Comment ID	Commenter	Public Comment	Response to Comment
		has been in a drought with current users being restricted, it is not responsible to add more strain to the aquafer and overall water situation.	(Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
8643-3	Steve Woods, Pam Woods	A question must be asked about the impact of explosives used to prepare the bases of the towers and other structures. The proposed area is full of lava beds. The structure of the lava beds is important to the collection and quality of aquifer recharge water. Potential collapse of the lava structure cannot be ignored. There are sensitive lava tubes throughout the area.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8670-1	Nancy Huddleston, Terrell Huddleston	My wife and I are 72 and are life long residents of Idaho. Nancy lived in Kooskia and Kamiah until she graduated from the U of I when she married me and moved to Buhl. I have lived in Twin Falls and Buhl my whole life except when attending the U of I where I obtained a masters degree in Fish Culture and Disease. I worked 40 years in the Idaho aquaculture industry for Clear Springs Foods as farm operations manager for most of my career. I was responsible for water flow measurement and reporting spring flow measurement where Clear Springs Foods held water rights for approximately 870 cfs of spring flow (aquaculture water rights are non-comsumptive) from the Eastern Snake Plain Aquifer (ESPA). I am very familiar with water rights and spring flows from the ESPA and their relationship to the Snake River, downstream/upstream water rights and impacts to resident and anadromous fish populations in the Snake and Columbia River systems. My comments will focus primarily on groundwater pages 3-433 to 3-447. There are things that I did not see mentioned in these pages such as the fact that the ESPA is an over-appropriated water resource where there are more water rights issued against the ESPA than there are groundwater or spring flows emanating from the aquifer. In the 1980s groundwater rights holders established the Idaho Water Alliance (IWA) to fund and establish aquifer recharge projects which could take surface water in high snow pack years to be diverted or conveyed to aquifer recharge sites where the water would be charge the aquifer to help stem the declining and over-appropriated spring flows. I was the president of the IWA during most of the 1990s. After more than 30 years of effort and investment by water right holders and the State of Idaho, aquifer recharge is a meaningful program today. Surface water in good snow years is recharged into the ESPA. Ground water pumpers, farmers and ranchers, formed Idaho Ground Water Associations (IGWA) groups. The IGWA groups tax themselves based on their water rights to fund aquifer recharge to mitigate loss of unfulfilled water to senior water rights holders. Seniors had placed calls on junior right holders. These actions were taken due to the Prior Appropriations Doctrine or first in time is first in right. Idaho has helped fund and manage aquifer recharge by appropriations in good budget years to pay for conveyance costs of recharge water through our canal systems above the aquifer and for development of recharge site structures. The Idaho Water Resource Department has assisted through funding an Aquifer Recharge Coordinator position. Twin Falls, Eden, Hazelton, Kimberly, Jerome, Gooding, Wendell, Hagerman, Buhl, and Bliss all get most of their municipal water from the ESPA as do most of the upstream municipalities. The water rights against the ESPA are not just local farmers and ranchers, aquaculture both private and public, and municipalities, but also a myriad of downstream water rights holders in the Snake and Columbia River systems including resident and anadromous fisheries, hydropower, irrigation, recreation, tribal, and navigation to name a few. There is no or little mention of these considerations in the pages that I reference in the EIS. Comments about the vast size of the ESPA and the high transmissivity and instantaneous recovery (section 3.17.1.1) make the ground water for wind turbines seem like a small ask. Those with investment of time and money into protecting and stabilizing groundwater from the ESPA know that it is a sensitive critical water resource for Idaho. It is an integral and very large component of the Snake River system. The EIS makes the ESPA seem like a limitless water resource when in truth every drop of flow has prior claims against it. Following are quotes from just the first paragraph of page 3-440: "Total water consumption by the project would be less than 0.001% of the overall amount of water within the ESPA. A hydrologic analysis of the project indicates that project groundwater use would drawdown existing groundwater wells close to the project wells 0.00 to 0.04 feet after 30 days of continuous pumping. None of the project phases would impact aquifer recharge to the Snake River." The EIS paints a very different picture than the over-appropriated scenario I have described above. It is a combination of all the water rights that make the ESPA not able to supply water to all the water rights. The first paragraph 3.17.1.2.6 CUMULATIVE IMPACTS on page 344.1: "The project (400 acre feet over 34 years) when combined with existing and future trends and actions (1.14 million acre-feet annually) would be a very small portion of overall aquifer discharge (approximately 8.22 million acre feet of water annually, most of which flows into the Snake River). Even if future trends double the demand to the aquifer, the volume of water stored in the aquifer is so large that the effects would not be substantial." The paragraph above certainly emphasizes the idea that any water consumed relative to the Lava Ridge project is simply not significant. These pages reference 600 gallons per minute total rate of water pumping for the project from 6 wells (alternative B). 600 gpm/454 gpm/cfs = 1.322 cfs x 1.983 af/day/cfs = 2.622 af/day x 364 days/yr = 954.4 af/yr x 34 years = 32,450 af over 34 years, not 400 af over 34 years as stated above. Equally ridiculous is the idea that if future trends double, the aquifer volume is so large that the effects would not be substantial. All of the water that flows out of the aquifer and into the Snake River already has valid water rights against it, ie over-appropriated. To harvest more water would require mining the aquifer with very deep wells which are deeper than the outflow elevations of the discharge springs of the ESPA. These are big errors and poor levels of explanation and understanding. It is mentioned that water for roads can be pumped from canals, but that water also requires water rights and some crops won't get watered. It is also mentioned that little of the water may actually get used while it is also mentioned that water may be needed for plant mitigation/ restoration long term, as well as dust control, and even for mitigation for feed for ranchers.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).

Comment ID	Commenter	Public Comment	Response to Comment
8683-4	Wayne Fischer	3.17.1 Ground Water This is my biggest concern and send chills up my back. Blasting for 520 days, twice a day to dig very large holes in the ground to support the base of these wind generators, will most likely destroy the lava aquifer under each wind generates for a mile of two. Lava is a very soft porous rock where the water in the aquifer slowly moves downhill to Thousand Spring on the north side of the Snake River Canyon. The aquifer also provides ground water for numerous farms, several cities and many rural homes as well. Where is the study that proves that the aquifer will not be heavily damage or even be totally destroyed? There should be absolutely no effect of any kind to the aquifer and the ground water. Note that the ground water moves very slowly through the aquifer, so it would take years before any damaged done would be documented. And then if there was extensive damage or destruction of the aquifer, there would be no way of rectifying the damage.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
8741-1	Richard Dinges	Construction of the Lava Ridge wind farm will have a detrimental effect on the underlying aquifer. The Snake River Plane Aquifer runs beneath the Lava Ridge project. The water flows in a very circuitous route beneath the surface. There is solid basalt, fractured basalt, layers of sand and layers of gravel. Over centuries, the water flow has established a pattern that is recognized by the wells that draw from it. With a projected two year time period of construction and with blasting every day to prepare foundations for the turbine towers, the effect on the aquifer flow can be profound. The shock waves from the dynamite blasts could cause some water flow routes to become blocked. The downstream effects may take months, even years to show up. Wells could dry up or require deepening. The economic loss would be born by the user with no recourse to the project developer for compensation. With a situation that cannot guarantee no harm will come to the aquifer flow, one must error on the side of caution. The NO BUILD OPTION must be selected. If this project goes forth, it will be under the proviso of LETS BUILD IT AND THE WE WILL FIND OUT WHAT THE PROBLEMS ARE.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
9289-2	Steve Ballard	One of the main concerns I have is the water that they will used to construct and maintain roads from dust abatement. Water is a precious commodity here in the state. Even when the project is completed they will still have to use water for dust abatement. Which has not been calculated in the project.	See response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
9473-2	Jeffrey Warren	One major concern is the Snake River Aquifer beneath the proposed site. Can you effectively test for and/or predict what will happen after all the blasting with high explosives that must occur to construct such a project? What effect will that have on our precious water supply? Petroleum products are used to maintain wind turbines, what effect will years of leakage from 400 turbines have on our water supply?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
9690-1	Stephanie Novacek	I am writing to express my absolute opposition to the Lava Ridge proposed wind site in Jerome, Lincoln and Minidoka counties. My main objection is due to the possibly unknown affects on our Eastern Snake River Aquifer. Below are three items(in blue) that are inaccurately addressed by the DEIS: "Peak construction would occur between weeks 14 and 54, and groundwater use would be highest during that time." The DEIS does not address groundwater consumption rate during the peak agricultural growing season and how it would avoid drawdown on the surrounding wells. During the hot summer growing season, water is paramount to farmers. Any interruption to an irrigation schedule can be devastating during July or August typical temperatures. It can severely reduce total crop yields(hay tonnage, sugar beet tonnage, 100cwt of beans or grains). "A hydrogeologic analysis for the project indicates that project groundwater use would drawdown existing groundwater wells close to the project wells 0.00 to 0.04 feet after 30 days of continuous pumping (Idaho Water Engineering 2021). (Though the exact location of the groundwater wells would be determined during final design, estimated project well locations would be 1,400 to 11,600 feet from existing groundwater wells.)" The project impacts to groundwater quantity would be measurable but would not be apparent to adjacent water users, including during the highest project groundwater use during construction. The DEIS does not address the possibilities of affecting existing groundwater wells, since it does not know the location and/or depth of each and every water table and established wells. Measure bbb: MVE would gain a clear understanding of the local hydrogeology as determined by Idaho Department of Water Resources and the BLM. Areas of groundwater discharge and recharge and their potential relationships with surface water bodies shall be identified prior to blasting and excavating. If construction activities near aquifer recharge areas cannot be avoided, they would be closely monitored to reduce the potential for contamination of said aquifer. This measure would further reduce impacts to groundwater quantity by ensuring that existing conditions are thoroughly understood before construction. "if construction activities near aquifer recharge areas cannot be avoided, they would be closely monitored to reduce the potential for contamination of said aquifer". This statement indicates they grossly lack understanding of our underground aquifer and it's maintained level of cleanliness and availability to South Central Idaho. It should be illegal for any turbine site to be located anywhere near aquifer recharge areas. Idaho's aquifer provides water for homes, businesses and agriculture from Rigby to Fruitland. Why the risk of the possible damage to the ESRA is even considered remains a mystery to me. If damage to surrounding wells or the infrastructure of the aquifer were to happen, who will pay? I doubt even LS Power has enough financial security to cover the conceivable litigation costs of such a ruinous event.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Also see response to comment 10426-2 (see in Table A-3z, Water and Wetland Resources). Text was added to EIS Section 3.17.1.2 (Groundwater Quantity, Impacts) to clarify the project's use of water rights and relation to the *Amended Snake River Basin Moratorium* (IDWR 2022).
9913-1	Michael and Susan Pohanka	My wife Susan and I are opposed to Lava Ridge project for the following two reasons. First our domestic water comes from our well in which our pump sets at 135 ft. The turbines will be set over the aquifer which is our main source of our water. Knowing the depths that the foundations will have to be dug for the wind turbines, the only only way to get to those depths for the foundations is to blast through the lava rock. There is no doubt that the cinders will end up being in the water that will destroy ours and other domestic pumps. The cinders will eat through the impellers thus having to replace our variable speed drive pump and the estimated cost to replace our domestic pump is estimated at approximately $3,500.00.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).

Wildlife, including Big Game

Table A-3aa. Wildlife, including Big Game

Comment ID	Commenter	Public Comment	Response to Comment
1042-8	WildLands Defense	Further, we are dismayed that BLM has let the WEST consultants slide by with this shoddy industry-biased wildlife analysis. An example of BLM negligence is Pygmy Rabbits – where there have been no actual current on the ground surveys – instead the EIS states: "Potential pygmy rabbit habitat in and around the siting corridors was identified using a desktop assessment (WEST 2021a) that considered vegetation type, soil depth, and fire history factors (Rachlow and Svancara 2006). Approximately 31,761 acres of potential pygmy rabbit habitat were identified (WEST 2021a); 17,571 of those acres are located in the siting corridors, which is the analysis area for pygmy rabbit (see Figure 3.18-7). Because the soil and vegetation data used in the desktop analysis are relatively coarse, they may not capture all potential habitat pygmy rabbit habitat in the siting corridors. For example, some of the area south of Sid Butte in the easternmost siting corridors contains suitable soils and mature sagebrush …".; This illustrates how shoddily the company treats wildlife – the company sits in the office and runs some models – without ever looking at the land.	Preliminary desktop habitat assessments were used to identify areas for field verification surveys as described in Section 3.18.4.1 (Pygmy Rabbit, Affected Environment). Although these field verification surveys did not cover all of the suitable pygmy rabbit habitat in the siting corridors, preconstruction pygmy rabbit clearance surveys would be required in all suitable pygmy rabbit habitat (see additional measure eee).
1042-17	WildLands Defense	The sound of such gargantuan turbines disturbing areas many miles from the project and further disrupting nesting, wintering, breeding wildlife must all be assessed with detailed noise studies and visual studies in the local environmental over all seasons and weather conditions. What frequencies will turbines of this immense type produce? How will project sights and sounds disrupt bat hibernacula, nesting birds, wintering sage-grouse, wintering big game, nesting migratory songbirds, and people's pets – both alone and combined?	The results of the project-specific viewshed analysis (SWCA 2024) are summarized in EIS Section 3.16 (Visual Resources) and the results of the project noise technical report (SWCA 2022) are discussed throughout the resource sections in EIS Chapter 3 (Affected Environment and Impacts) and AIBs in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief), as appropriate. Impacts to bat roosting habitat are disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat), impacts to greater sage-grouse are disclosed in EIS Section 3.3.4 (Greater Sage-Grouse), impacts to big game are disclosed in EIS Section 3.18.2 (Big Game Habitats and Populations), and impacts to migratory birds are disclosed in EIS Section 3.3.2 (Avian Populations); see also Table App3-1 in EIS Appendix 3. Noise impacts in residential areas are also disclosed in Table App3-1 (see AIB-20).
10432-1	JoEllen Clayton	Another thought concerning the waste of Idaho land is where will the wildlife go when they no longer have a habit to live in? Closer to cities and towns in Idaho? That would be detrimental to the well being of both human and wildlife. Wouldn't that cause the human-wildlife conflict to spiral out of control?	Effects to wildlife, including disturbance and displacement, are discussed in EIS Section 3.18 (Wildlife).
10512-8	S. (No Last Name Provided)	There is also the pygmy rabbit which has an S3 rating for species of greatest needs and their populations are weak but there good populations of them in Lincoln County and Jerome County. Is it a good idea to tear up thousands of acres of habitat to put these wind turbines in with their accompanying roads and traffic? Once again, another significant miss in the EIS.	Effects to pygmy rabbit and its habitat are described in EIS Section 3.18.4 (Pygmy Rabbit). No pygmy rabbits or their sign were detected during MVE's pygmy rabbit surveys. Although these field verification surveys did not cover all of the suitable pygmy rabbit habitat in the siting corridors, preconstruction pygmy rabbit clearance surveys would be required in all suitable pygmy rabbit habitat (see additional measure eee).
1083-1	Richard Gailey	The area that is platted for the wind farm is some of the best cotton tail rabbit hunting I have found. It is perfect habitat for the cotton tail rabbit. It is also great habitat for the pygmy rabbit, which once was in abundance in the Western United States. Now they find themselves on a list of endangered or species of greatest conservation need. There are thirteen species in Idaho on this list, five which are bats, which could greatly be affected by these huge wind-mills, and a secondary affect would be an increase of the bug population that would plague the farmers who in turn would have to use more chemicals on their fields to try to control them. The increase in chemicals would increase the damage to our environment added as a result of the so called green energy project proposed. It has been proven that chemicals have an effect on different species of bird life. Chemicals have been banned that proved to have an effect on the birds eggs, which in the early seventies put Bald Eagles on the endangered species list. Banning certain chemicals help restore the Eagle populations, but cut the effectiveness of insect control. No chemical can replace the natural control lost with the loss of the bats in the area,	Potential impacts to pygmy rabbit are disclosed in EIS Section 3.18.4 (Pygmy Rabbit) and potential impacts to bats (including those designated as SGCNs) are disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat). Other special-status species are addressed throughout EIS Chapter 3 (Affected Environment and Impacts) and EIS Appendix 3 (Issues Analyzed in Brief). Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but in none of these cases has a reduction in crop productivity or yields due to increased populations of harmful insects been documented. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that there would be increases in harmful insect populations that would have negative economic consequences for the local agricultural economy. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
11326-6	Filip Camacho, Tasha Sorensen	Unfortunately, in the West, both dark sky sanctuaries and intact public land ecosystems are becoming rarer and rarer. In November of 2022, the Bureau of Land Management (BLM) issued Instruction Memorandum IM 2023-005 addressing habitat connectivity on public lands. As fish and wildlife habitat across the West becomes increasingly fragmented and functionally challenged, remaining habitat will become increasingly less resilient and able to sustain robust fish and wildlife populations, especially in transition ecosystems similar to those areas	IM 2023-005 instructs BLM state offices to conduct an assessment of existing priority habitats on BLM land and the connectivity between them, which is intended to guide future land use planning efforts and decisions that involve habitat conservation and restoration. The potential impacts to special-status wildlife were carefully considered during project siting and the development of the range alternatives analyzed in the EIS. In addition to MVE's applicant-committed measures, the BLM has developed a number of other mitigation measures to

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		surrounding Dietrich, Shoshone, Gooding, Richfield and others. These transition landscapes provide much needed food, water, shelter and space for seasonal migrations, especially for big game species and migratory birds. In the proposed project area, migrating and resident avian and terrestrial species would be significantly impacted and the range of Alternative in the DEIS fails to consider those impacts.	minimize or avoid impacts to wildlife that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]). EIS Section 3.18 (Wildlife) describes migratory habitat and routes in the analysis area and discloses the potential for significant impacts to big game species and wildlife movement in general. Impacts to migratory birds are disclosed in EIS Section 3.3 (Avian and Bat Species); see also EIS Appendix 3 (Issues Analyzed in Brief). The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the location and use of mapped migration and movement corridors and stopover sites, and the range of potential impacts on these corridors and stopover sites based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The BLM worked closely with IDFG to compile and analyze the best available information to disclose impacts to big game migratory corridors as accurately as is possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use, including additional stopover sites that have been identified. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
11326-7	Filip Camacho, Tasha Sorensen	Transmission and interconnection infrastructure, needed to get energy resources to market, could easily be the largest threat to intact public lands, outdoor recreation and fish and wildlife habitats across the West. We need an all of the above energy strategy in the U.S. that includes both traditional and renewable energy resources. With rapidly changing technology, the BLM should review project requirements for consistency with technological advances. The BLM should consider whether these features adequately account for and mitigate the impacts of wind development for big game and avian species. Federal land management agencies need to prioritize improving protections for migratory animals instead of just looking at curtailment strategies used to mitigate or manage loss. This information is lacking in the DEIS.	Regional transmission infrastructure is beyond the scope of this EIS. Big game are discussed in EIS Section 3.18.2 (Big Game Habitats and Populations) and avian species are discussed in EIS Section 3.3 (Avian and Bat Species). These sections describe the mitigation measures that would be implemented to minimize or avoid impacts to these species; see EIS Appendix 4 (Mitigation) for a complete list of mitigation measures.
11336-2	Nathan Schutte	2. Vibrations. It has been discussed that these large sized wind turbines can produce vibrations that effect several species of birds, bats, mammals, and humans. I didn't see any study on how the vibrations directly related to the wind turbines would affect the local wildlife and human population. The project site sits on large Lava Rock deposits and vibrations from the footings could carry long distances and have a negative effect on the area. With the quantity and size of the proposed turbines, this effect would be double in compared to the size of turbines that have actually been constructed in the wind industry.	A literature review did not identify any publicly available literature indicating that vibration from operational turbines can significantly impact wildlife. Concerns with vibration from wind turbines are primarily related to the generation of low-frequency noise (also known as infrasound). Although research in this area is limited, the predicted effects of infrasound are similar to those for noise at audible frequencies (Lovich and Ennen 2013). The discussion of impacts to wildlife from noise in EIS Section 3.18 (Wildlife) and EIS Appendix 3 (Issues Analyzed in Brief) provide sufficient disclosure of effects to wildlife from noise, and therefore, further analysis of impacts from infrasound in the EIS is not warranted. See also the response to comment 3873-2 (see in Table A-3t, Pollinators and Insects) for a discussion of impacts to terrestrial invertebrates from vibrations caused by wind turbines.
11458-2	Kathy McKenzie, Bret McKenzie	Raptor & Bats--the use of " May" help save lives & " does not Appear " to threaten populations is very very weak. The " Appear to be" death counts are summarized from comparing existing wind farms but when the peak level of deaths have occurred from this oversized experimental project no MVE Take Permit from IF&G is going to stop the continuing destruction of Idaho's wildlife--it will be too late and beyond the control of Idaho. With the death of so many raptors & bats an environmental imbalance will happen resulting in an over population of rodents & insects in this state, effecting our framers and households alike.	As stated in EIS Section 3.3.1 (Bat Populations and Roosting Habitat) and EIS Section 3.3.2 (Avian Populations), the estimated avian and bat fatality rates presented in Table 3.3-4 and Table 3.3-12 are not intended to be precise predictions but are presented to allow for a meaningful comparison between the alternatives. These fatality estimates also do not account for the implementation of mitigation measures that would be implemented to minimize or avoid impacts to bats and birds; see EIS Section 3.3.1.2 (Bat Populations and Roosting Habitat, Impacts), EIS Section 3.3.2.2 (Avian Populations, Impacts), and EIS Appendix 4 (Mitigation). IDFG would not issue a take permit for the project because no such permit exists. As described in EIS Section 3.3.3.2.2 (Eagles, Alternative B [Proposed Action]), MVE has applied for an eagle ITP from USFWS, the issuance of which is a decision separate from BLM's decision to grant MVE a ROW for the project, and the USFWS is evaluating the effects of granting the ITP in a separate NEPA document.
11491-25	Dean Dimond, Jennie Bateman	8. New information and specific changes in wildlife corridors on federal lands due to number of acres and densities of proposed project	Impacts to general wildlife movement are disclosed in EIS Section 3.18.1 (Wildlife Movement [non-game mammals and reptiles]); additional species-specific discussion, including impacts to known migratory corridors, are disclosed in EIS Section 3.18.2 (Big Game Habitats and Populations). These analyses were prepared with the best available scientific data; refer to the data sources listed in the introduction to each section for additional details.
11491-26	Dean Dimond, Jennie Bateman	20. New information detail of impacts on wildlife and fisheries from the state G&F Agency regarding impacts on wildlife corridors.	See response to comment 11491-25 (see in Table A-3aa, Wildlife, including Big Game) regarding wildlife corridors and data sources evaluated in the EIS, which includes data obtained through coordination with IDFG and other state and federal agencies. Impacts to wildlife are disclosed in EIS Section 3.18 (Wildlife); see also EIS Section 3.3 (Avian and Bat Species), and EIS Section 3.11 (Pollinators and Insects). Impacts to fish are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief).
11499-1	Sarah Corran	I am writing to highlight the negative effects of the Lava Ridge Wind Farm on the desert ecosystem in and around the project area. In particular, I am concerned about the impact of the wind farm's access roads and the increased recreational vehicle traffic that may result from the project. Studies from other wind farms have shown that adding miles and miles of access roads to remote areas can have negative effects on the surrounding ecosystem. These roads can fragment habitats, create barriers to wildlife movement, and lead to soil erosion and runoff. Additionally, the increase in recreational vehicle traffic that may result from the project can further exacerbate these impacts by disturbing the climate and ecosystem. One study that highlights the importance of such an analysis is the study of the effects of wind farms on the Mojave Desert ecosystem in California. This study found that the construction of wind turbines and associated access roads led to habitat fragmentation, soil erosion, and an increase in the number of invasive plant species. The study concluded that a comprehensive analysis of the potential impacts on the desert ecosystem was necessary to ensure that the wind farm did not compromise the health and well-being of the ecosystem. Another study that underscores the need for a	Refer to Table 2.4-1 and Table 2.4-2 in EIS Section 2.4 (Alternative B [Proposed Action]) for details on new and improved roads that would be constructed for each of the action alternatives. Impacts from road construction and improvement are discussed in detail in numerous resource sections in EIS Chapter 3 (Affected Environment and Impacts). Miles of new and improved access roads are used as impact indicators for several resources. A number of mitigation measures would be implemented to minimize or avoid effects associated with project access roads; a complete list is provided in EIS Appendix 4 (Mitigation). Habitat fragmentation from roads is discussed in EIS Section 3.18 (Wildlife), soil erosion is discussed in EIS Section 3.13 (Soils), and impacts to water resources from runoff are discussed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief; see AIB-48). Effects from increased recreational vehicle traffic are discussed for many of the resources analyzed in detail in EIS Chapter 3 and resources analyzed in brief in Table App3-1.

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		comprehensive analysis of the impacts of wind farms on the surrounding ecosystem is the study of the Maple Ridge Wind Farm in New York. This study found that the construction of wind turbines and associated access roads led to the fragmentation of the surrounding forest and wetland habitats, which had negative effects on the ecosystem as a whole. The study concluded that a comprehensive analysis of the potential impacts on the surrounding ecosystem was necessary to ensure that the wind farm did not compromise the health and well-being of the ecosystem. Given these examples and the potential negative impacts of the Lava Ridge Wind Farm on the desert ecosystem in the area, I urge you to conduct a comprehensive analysis of the potential impacts on the surrounding ecosystem. This analysis should include an evaluation of the potential impacts of the wind farm's access roads on habitat fragmentation, soil erosion, and runoff, as well as an assessment of the potential effects of increased recreational vehicle traffic on the climate and ecosystem.	
11527-14	Richard Stover; State of Idaho	The DEIS states that each of the Project's action alternatives would likely have adverse effects on existing wildlife resources, including habitat and populations of migratory pronghorn, migratory mule deer, greater sage-grouse, migratory birds, and bats that occur at least seasonally in the Project area. These wildlife resources are priorities for the State of Idaho. Thus, the FEIS and ROD must fully analyze and disclose Project effects of each action alternative on these priority wildlife resources and fully mitigate for adverse Project effects of the selected alternative, including avoidance, minimization, and compensatory mitigation measures as appropriate.	Pronghorn, mule deer, greater sage-grouse, migratory birds, and bats are discussed in EIS Sections 3.18.2 (Big Game Habitats and Populations), 3.3.4 (Greater Sage-Grouse), 3.3.2 (Avian Populations), and 3.3.1 (Bat Populations and Roosting Habitat), respectively; see also EIS Appendix 3 (Issues Analyzed in Brief). Other wildlife species are addressed in EIS Sections 3.3.3 (Eagles), 3.11 (Pollinators and Insects), 3.18 (Wildlife Movement), 3.18.3 (Amphibians), and 3.18.4 (Pygmy Rabbit); see also EIS Section 3.15 (Vegetation). Each of these sections analyzes and discloses the effects of the action alternatives on wildlife and their habitat and described the mitigation measures that would be implemented to minimize or avoid these impacts, as well as potential compensatory mitigation measures (where warranted); see also EIS Appendix 4 (Mitigation).
11535-12	Steven Andersen	The DEIS relies heavily on databases, literature, and deficient site-specific surveys, rendering the DEIS woefully inadequate as to baseline impacts. While review of literature and databases is an important subset of regional presence-absence data, it cannot replace focused or protocol surveys that provide site-specific accuracy and essential information on irreparable impacts. Even sophisticated models are known to consistently underestimate real world presence-absence data—which is even more true in this project given its unprecedented magnitude. 20 It is apparent from the DEIS that the analysis did not adequately consider estimates of occupancy of various target species. More specifically, while the DEIS may have attempted to detect the presence of target species, such as avian population, wildlife, amphibians, etc.—even at that it wholly failed—the DEIS did not consider the absence of target species, even though those target species may in fact occupy the territory. An observed absence could be the result of the survey method failing to detect the presence of the species that is actually resident at the location (e.g., the species was then-currently present elsewhere within its home range).21 However, that does not mean that the species is necessarily "absent." The DEIS makes this mistake throughout generally all of the impact sections concerning target species. Ignoring such detection of "absent" target species creates a false baseline, i.e., a "false absence." In other words, the effect of ignoring imperfect detection is that estimates of occupancy and related parameters can be (and are) biased, resulting in misleading inferences about the system and leading to erroneous management (or development) decisions.22 The results of any purported analysis that ignores such detection therefore represents only a surveyor's ability to find the target species in the landscape, not where the species actually is in the landscape. 23 At its simplest, a bird species (which the DEIS purportedly analyzed) may simply fail to call during a timed audio survey, or an animal (such as big game, which the DEIS also purportedly analyzed), may not happen to walk across a tracking plate or within view of a surveyor (if one is even present).24 The DEIS did not take this into account for any of the identified wildlife species, and the BLM must conduct substantial site-specific25 surveys for each of the target species—modern technology does not resolve the non-detection issue.	The baseline resource studies conducted for the project are one of many sources that were evaluated in the determination of which species may be present in the siting corridors. See the data sources listed in the introduction to each resource section in Chapter 3 (Affected Environment and Impacts) for additional details.
11535-61	Steven Andersen	Furthermore, the DEIS does not address fire impacts on animals. "Fire may affect wildlife through (1) direct mortality, (2) reduction of habitat, or (3) a reduction in habitat quality."205 As discussed above, short-term and long-term fire effects on wildlife are related to fire impacts on vegetation, which in turn affect habitat quality and quantity, including the availability of forage shelter.206 Moreover, "[l]ong-term changes in vegetation from a fire (such as loss of sagebrush or the invasion or increase of nonnative annual grasses) may affect food availability and quality and habitat availability for wildlife; the changes could also increase the risk from predation for some species[.]"207 Additionally, fires directly impact certain burrowing animals. Reports show the death of burrowing animals from asphyxiation in their burrows during fires.	The BLM has included a discussion on how invasive plant species alter fire regimes. The BLM has also described how the changing fire regimes could negatively impact wildlife, including sensitive species, such as sage-grouse.
11535-65	Steven Andersen	Wildfire Cumulative Effects The project's potential to ignite fires and interfere with suppression of wildfires in an area known for high wildfire risk should be considered in conjunction with the impacts of the region's recent history of wildfire events. Not only is interference with fire suppression inconsistent with the Monument RMP (as outlined above), it further will degrade wildlife habitat (already struggling to recover from past wildfires), further aggravate soil erosion and negatively impact fragile soils, destroy natural vegetation (relied upon by wildlife and cattle), increase noxious weeds, threaten livestock, crops, property, and human life, and have serious, long-term impacts on the entire regional ecosystem. This region cannot withstand cumulative effects from wildfires alone.	The BLM has included a discussion on how invasive plant species alter fire regimes. The BLM has also described how the changing fire regimes could negatively impact greater sage-grouse and other special-status species that rely on sagebrush habitat, wildlife, and livestock grazing.
11535-73	Steven Andersen	Moreover, the DEIS states that "exposure to contaminants such as herbicides may impact individuals" it makes no mention of herbicide exposure to vegetation and wildlife. During operation of a wind energy project, wildlife may be exposed to accidental spills or releases of pesticides, fuel, or hazardous materials. Exposure to these materials could affect reproduction, growth, development, or survival of exposed individuals. If the magnitude and extent of the spill and subsequent exposure are sufficient, population level effects may be incurred.	Impacts to vegetation and wildlife from herbicide exposure and impacts associated with herbicide leaks and spills are described in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-47 and AIB-58. Herbicides will be applied in accordance with the procedures described in the Noxious Weed Management Plan (Appendix R in MVE [2023]).

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11535-87	Steven Andersen	Wind energy has the potential to contribute to the problems associated with habitat loss and fragmentation despite the fact that a matrix of relatively undisturbed habitat can exist among turbines and other infrastructure. In fact, species that avoid vertical structures and need large unfragmented habitats are especially at risk to wind energy development. Wind requires less infrastructure but result in higher levels of habitat fragmentation, because their impacts are geographically scattered rather than concentrated. 269 The associated infrastructure required to support an array of turbines—such as roads and transmission lines—represents an even larger potential threat to wildlife because such infrastructure can result in extensive habitat fragmentation and can provide avenues for invasion by exotic species.270 The DEIS does not consider these issues.	The disturbance estimates and associated analysis of impacts to wildlife from habitat fragmentation are described in EIS Section 3.18 (Wildlife); additional discussion of effects to wildlife habitat and habitat use, including effects from the introduction or spread of nonnative plant species is provided in Table App3-1 of EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1, AIB-8, AIB-41, AIB-57, AIB-61, AIB-62, and AIB-63. Nonnative plants will be controlled in accordance with the procedures described in the Noxious Weed Management Plan (Appendix R in MVE [2023]).
11535-144	Steven Andersen	One of the biggest threats to BLM special-status plants is the use of herbicides, for which the DEIS wholly fails to account. The specific section of the DEIS that addresses BLM special-status plants makes no mention of the application of herbicides.	See EIS Appendix 4 (Mitigation) for a complete description of mitigation measures that would be implemented to minimize or avoid impacts to BLM special-status plants, including BLM approval of all herbicide applications, adherence with the SOPs in the 2007 and 2017 BLM vegetation treatments using herbicides programmatic EISs (BLM 2007, 2016) (applicant-committed measure 101 and BLM-required measure Z), and avoidance or mitigation of impacts to BLM special-status plant populations during operations (additional measure kkk). Therefore, impacts to BLM special-status plants from herbicide applications are not anticipated.
11535-145	Steven Andersen	In fact, it is expressly admitted that “MVE has not committed to complete avoidance of BLM special-status plants.”427 This is crucial because many of the mitigation efforts are applied under the discretion of MVE. For example, if MVE determines avoidance of construction in areas of sensitive resources is not feasible, “construction would be allowed to proceed with approval from the Authorized Officer, and MVE would consider relocation of plants per the direction of the BLM.” 428 It would seem that what is feasible is completely under MVE’s discretion and all it has to do is consider relocation of plants.	See EIS Sections 3.15.1.2.2 and 3.15.2.2.2 for a description of additional avoidance and minimization measures that are not included in MVE (2023) but would be included in the terms and conditions of the ROW permit, if a ROW is granted and Alternative B is selected. This includes additional project-specific measure kkk, which would require MVE to avoid conducting any construction, maintenance, or decommissioning activities that would disturb BLM-listed sensitive plant individuals and habitat until the BLM determines sufficient mitigation measures are implemented. These measures would also apply to Alternatives C–E and the Preferred Alternative.
11535-157	Steven Andersen	The DEIS lumps all wildlife movement together under one section. Yet, “the specific effects of turbine construction and presence may be modulated by habitat type (e.g., grassland or forests), the habitat suitability at the site, the wind turbine type (e.g., height, size, configuration of a wind park) and species-related behavioral traits (e.g., disturbance sensitivity, antipredator behaviour),”434 which ultimately makes “displacement effects due to wind turbine development also highly species specific.”435 “[E]ven if the effect of wind turbines on a species is unknown, evidence-based information on species’ habitat selection and spatial requirements is often largely available or can be generated with relatively low effort from existing data sources.”436 Experts recommend that “this knowledge should be applied to determine prohibition zones for wind turbine development and advocate that the precautionary principle is used to protect viable populations of species and not only individuals.437 Each road built displaces terrestrial wildlife and impacts wildlife populations and causes stress and elevated energy use for those that remain. The DEIS must conduct a species-specific movement analysis to truly understand the extent to which species will be displaced from the land.	As stated in EIS Section 3.18.1.1 (Wildlife Movement [non-game mammals and reptiles], Affected Environment), “Sagebrush steppe habitat supports a variety of wildlife species; a review of existing data sources (IDFG 2020) identified occurrences of four amphibian species, 73 bird species, 12 fish species, eight invertebrate species, 13 mammal species, and nine reptile species in the siting corridors and surrounding region, though these data likely underestimate the local biodiversity, especially for smaller, less-studied taxa. Pollinators and insects are discussed in Section 3.11, big game species are discussed in Section 3.18.2, amphibians are discussed in Section 3.18.3, and avian and bat species are discussed in Section 3.3. Fish are analyzed in brief (AIB-55 and AIB-56) in EIS Appendix 3. Therefore, the discussion in this section focuses on the following species not discussed in other sections of this appendix and EIS: Small mammal species such as shrews (*Sorex* spp.), voles, rabbits, squirrels (including Piute ground squirrel), and mice Larger non-game mammals such as coyote (*Canis latrans*), yellow-bellied marmot (*Marmota flaviventris*), and skunks A variety of reptiles such as lizards and numerous species of snake”
11535-158	Steven Andersen	This section does not account for the decrease in genetic diversity caused by impeded wildlife movement. Roads can serve as barriers to the movements of small mammals as well as those of large ungulates and carnivores.438 The reduction of animal movement associated with roads also serves to genetically isolate populations. Gerlach and Musolf (2000) indicated that highways had an important effect on gene flow and genetic structuring of bank voles (Clethrionomys glareolus) in Germany.439 Moreover, Epps et al. (2005) reported that highways contributed to the rapid decline of 27 populations of desert bighorn sheep (Ovis canadensis) because gene flow was eliminated between populations, resulting in a rapid reduction in the genetic diversity of desert bighorn sheep populations.440 Lode (2000) concluded that road traffic effectively isolated the vertebrate populations he studied by influencing species demography and population exchanges.441 Furthermore, Forman (1998) believed that the barrier effect that subdivides populations, thereby imposing genetic consequences on these populations, is one of the most important effects roads impose on ecological communities.442 The DEIS fails to consider, let alone provide mitigation measures for the foregoing irreparable impacts.	Decreased gene flow is one of many affects associated with habitat fragmentation and barriers to wildlife movement (see EIS Section 3.18.1 [Wildlife Movement (non-game mammals and reptiles)]); impacts to big game from habitat fragmentation and barriers to movement are disclosed in EIS Section 3.18.2 (Big Game Habitats and Populations). See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game). Species-specific analysis of the relationship between habitat fragmentation and gene flow is provided in EIS Section 3.18.4.2.2 (Pygmy Rabbit, Alternative B [Proposed Action]). Further discussion in the EIS would be inconsistent with 40 CFR 1502.2(a).
11535-166	Steven Andersen	The DEIS did not take a hard look at the irreparable impacts to amphibians in the proposed siting corridor (even less where the turbine location is still unknown). Specifically, “[t]hus, while BLM (2005) provides sufficient disclosure and analysis of the effect of habitat loss on general wildlife species … additional site-specific discussion of potential impacts to amphibian breeding habitat is warranted.”444 This additional “site-specific discussion” has not yet been conducted, despite the agency indicating it is necessary. Importantly, because this site-specific discussion has not been conducted, the DEIS indicates that thus far, “[t]he only amphibian species that has been documented in the siting corridors is western toad (Anaxyrus boreas).” 445 This is concerning because not only is the western toad located in the proposed siting corridor, but also the western chorus frog, northern leopard frog, great basin spadefoot toad, boreal chorus frog, and sierran treefrog.446 None of these amphibians were given proper attention during the analysis.	See EIS Section 3.18.3.1 (Amphibians, Affected Environment) for a description of amphibian species that may occur in the siting corridors. Impacts to amphibians are described in EIS Section 3.18.3.2 (Amphibians, Impacts).
11535-167	Steven Andersen	The DEIS also failed to adequately consider the impact roads will have on amphibians. As stated in the DEIS, the project proposes at a minimum 101 miles of new roads, with a maximum of 486 miles of new road.447 This magnitude of land disturbance and fragmentation will cause irreparable harm to the local amphibian population. Habitat requirements of amphibians vary seasonally, and thus, distribution of resources across the landscape relative to roads can influence mortality.448 These resources are associated with refuge, mates, and prey that	EIS Section 3.18.3.1 (Amphibians, Affected Environment) describes amphibian use in the siting corridors, including patterns of habitat use and typical dispersal distances. EIS Section 3.18.1.2 (Wildlife Movement [non-game mammals and reptiles], Impacts) describes affects to wildlife movement from habitat fragmentation and

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		tend to be concentrated in distinct habitats that are patchily distributed.449 Amphibians migrate in mass numbers between breeding ponds and terrestrial habitats.450 These taxa are therefore dependent on “landscape complementation” (a measure of proximity of critical habitat types and dispersal ability of the organism) to successfully complete their life cycles.451 When roads fragment such habitats, the probability that individuals will be killed or injured by traffic during movements in search of resources, increases, as does the resistance of the landscape to such movements.	injury or mortality from vehicle strikes on project access roads; additional details specific to amphibians are provided in Section 3.18.3.2 (Amphibians, Impacts).
11535-168	Steven Andersen	Further, the DEIS fails to take a hard look at the impact of “off-road” effects, as pertaining to amphibians. The combined outer limits of the manifold ecological effects involving species, soil, and water that extend beyond the road surface describe a “road-effect zone.” 453 The zone is irregular with boundaries dependent on the sequence of ecological variables, and disparate effect-distances due to nature’s directional flows such as slope, wind, and habitat suitability on opposite sides of a road.454 The data suggests that the combined effects (thermal, hydrological, chemical and material pollutants, sediments, noise, invasion of roadside species, and human access affecting wildlife, fire, and sensitive habitats) extend outward for greater than 100 meters from the road edge.	See EIS Section 3.18.3.2 (Amphibians, Impacts) for a discussion of potential indirect effects to amphibian breeding habitat, including effects from noise and human presence, stormwater runoff, pollution, and sedimentation. Impacts related to increased fire risk are described in EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression). Potential impacts to wildlife habitat from the introduction or spread of nonnative plant species are described in Table App3-1 of EIS Appendix 3 (Issues Analyzed in Brief); see AIB-57. EIS Section 3.18.3.2.2 (Amphibians, Alternative B) describes avoidance and minimization that would be implemented to minimize or avoid impacts to amphibians and their breeding habitat, which includes preconstruction surveys and avoidance of disturbance within 330 feet (approximately 100 meters) of occupied habitat or additional mitigation where avoidance is not possible (additional measure cc, also see EIS Appendix 4 [Mitigation]). This buffer is consistent with the Habitat Management Guidelines recommended by Partners in Amphibian and Reptile Conservation (Pilliod and Wind 2008) and is of sufficient size to address indirect impacts to habitat from access road construction. Additionally, as specified in applicant-committed measure 123, “Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts would be submitted to the appropriate regulatory agency. MVE would implement the applicable U.S. Army Corps of Engineers (USACE), Idaho Department of Water Resources (IDWR), and BLM standards (e.g., erosion and sediment control measures, culverts sized in accordance with USACE and BLM standards, etc.) for all road crossings or other work in wetlands or waters to ensure protection of water quality and to maintain the hydrology of affected areas.” Pilliod, D.S., and E. Wind (eds.). 2008. *Habitat Management Guidelines for Amphibians and Reptiles of the Northwestern United States and Western Canada*. Technical Publication HMG-4. Birmingham, Alabama: Partners in Amphibian and Reptile Conservation.
11535-169	Steven Andersen	Problems arise when wildlife use road systems for movement, because roads are designed to serve as travel corridors for human purposes that do not provide the quality of environment necessary for wildlife health—which the DEIS does not take into account.456 Unlike natural corridors, roads frequently cross both topographic and environmental contours thereby fragmenting a range of different habitat types, extending the range of impacts to many wildlife groups possessing a diversity of life history strategies.457 Road construction results in habitat destruction with a replacement zone of intense human activity and subsequent alteration of wildlife habitats and behavior.458 The transformation of physical conditions on and adjacent to roads eliminates areas of continuous habitat and simultaneously creates edge effects that extend beyond the duration and extent of construction; something greatly compounded in this case given the unprecedented magnitude of the Lava Ridge project.459 These edge effects create habitat of compromised quality, which can result in wildlife death that actually occurs off-road.	See EIS Section 3.18.1.2 (Wildlife Movement [non-game mammals and reptiles], Impacts) for a discussion of impacts to wildlife movement, including direct and indirect effects from construction of new access roads and increased vehicle traffic. Additional discussion of indirect effects to wildlife habitat from access road construction can be found in the biological resource sections in Chapter 3 as well as Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief).
11536-8	Richard Llewellyn	Herein lies an acceptance of an almost certainty for failure for restoration, and belies the larger assumptions and pretenses of the entire EIS – successful restoration of the sage steppe plant community, and the foundational sage brush, is essential to mitigate harm to populations such as raptors, bats, and ungulates, especially pronghorn. Although the referenced cover and diversity thresholds are absent from the EIS, and could not be located online, the overwhelming conclusion of scientific evaluation of restoration efforts is that a 5 year time frame is unrealistically optimistic to achieve and ensure native sage steppe community restoration after disturbance.	The assumed timeframe for recovery of sagebrush steppe is 50 years; final reclamation would begin in year 34, after decommissioning is complete and continue through year 39, at a minimum. Complete recovery of sagebrush steppe vegetation would not be expected until year 84. As described in EIS Section 3.15.1.2.2 (Native Upland Vegetation Communities, Alternative B [Proposed Action]), MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria, which would ensure that desired vegetation communities are restored following decommissioning (see also BLM-required measure P).
11547-3	Lowell Ihler, Carol Ihler	3. Our understanding is that BLM is to protect the land and wildlife and manage it for all people and wildlife. This is public land and NO corporation should be allowed to destroy it with huge wind turbines and and noise that no one is certain that it will not affect the animals and people in a negative way. Studies have been done in other countries as well that show there are possible effects to people and animals, both those that live above ground and those that burrow or live underground. In the United States there are documented accounts of how wind turbines in the ocean are affecting the whales and other sea life.No reason to believe that the turbines won't affect the wildlife here in the same way. The DEIS states it would take 80 years to restore some of the lost wildlife etc. Why would that be allowed when it is the duty of BLM and the Fish and Game to protect these species.	Adverse effects on wildlife and humans from construction, operation, and decommissioning of the project are disclosed in EIS Chapter 3 (Affected Environment and Impacts) and EIS Appendix 3 (Issues Analyzed in Brief). The 84-year analysis timeframe for biological resources is based on the estimated time it would take sagebrush steppe vegetation to fully recover following decommissioning. Areas subject to interim reclamation or where grassland vegetation is the target of reclamation would recover sooner (although mature vegetation may not develop in work areas if they are disturbed again following interim reclamation). Species that depend heavily on mature sagebrush steppe vegetation were given careful consideration in the development of alternatives and the analysis in the EIS; see EIS Sections 3.3.4 (Greater Sage-grouse)] and 3.18.4 (Pygmy Rabbit). A number of mitigation measures would be implemented to minimize or avoid impacts to wildlife and ensure the selected alternative is consistent with state and federal wildlife management goals; see EIS Appendix 4 (Mitigation).
11576-2	Kelly Human	The EIS project significant impacts on federally protected birds and species of concerns such as eagles. They suggest future mitigation would make up for habitat loss and or the killing of these birds. The company was allowed to promise avoidance to the extent feasible or promise "mitigation and compensation quote to by the agencies and stakeholders off with the promises of future investment and habitat improvement elsewhere this is totally ridiculous and the BLM Knows this. There was a time when BLM put restrictions on building projects within a mile of a single eagle nest. The same is true for grouse leks And other critical habitat. The BLM should	See EIS Sections 3.3.3 (Eagles) and 3.3.4 (Greater Sage-grouse) for detailed discussions of the potential impacts to greater sage-grouse and bald and golden eagles, as well as the mitigation measures that would be implemented to minimize or avoid impacts to these species. The potential impacts to special-status wildlife, were carefully considered during project siting and the development of the range alternatives analyzed in the EIS. In addition to MVE’s applicant-committed measures, the BLM has developed a number of other mitigation measures to minimize or avoid impacts to wildlife that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]). As required by BLM policy, relevant RDFs from the

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		reject pie in the sky promises of future mitigation. How about the bats and the other birds that will be killed? [...] What about the grazing? what about all of the deer antelope and other wild game in the area?	greater sage-grouse ARMPA (BLM 2015) would also be implemented. As described in EIS Section 3.3.3.2.2 (Eagles, Alternative B), there are currently no eagle nests within 2.5 miles of the siting corridors and additional raptor nest surveys would occur prior to construction so that avoidance buffers can be established if new eagle nests are established in or near the siting corridors. Applicant-committed measures 139-140 and 144-148 in EIS Appendix 4 (Mitigation) provide additional restrictions on construction and maintenance activities in proximity to known eagle nests. This section also describes mitigation measures that would be implemented to minimize or avoid other impacts to eagles and discusses postconstruction eagle fatality monitoring requirements and adaptive management measures that could be implemented to reduce eagle fatalities, if necessary. As described in EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), the USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines. The greater sage-grouse is not an ESA-listed species, and thus, there is no critical habitat for this species; there are no other designated or proposed critical habitats in the siting corridors and vicinity. No siting corridors would be located within 3.1 miles of occupied sage-grouse leks (see Figure 3.3-8) and there are no important or priority habitat areas in the siting corridors (see Table 3.3-12). EIS Section 3.3.4.2.2 (Greater Sage-Grouse, Alternative B) describes additional mitigation measures that would be implemented to minimize or avoid impacts to greater sage-grouse and their habitat, including avoidance buffers and seasonal activity restrictions. As described in the EIS Section 3.3.4.4 (Greater Sage-Grouse, Compensatory Mitigation), the HQT is the standard method for calculating the amount of compensatory mitigation necessary to meet the net conservation gain standard established in the greater sage-grouse ARMPA (BLM 2015); see also EIS Appendix 4 and the GRSG Mitigation Plan (Appendix U in MVE [2023]). Impacts to other avian species are disclosed in EIS Section 3.3.2 (Avian Populations), impacts to bats are disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat), impacts to big game and other wildlife are disclosed in EIS Section 3.18 (Wildlife), and impacts to livestock grazing are disclosed in EIS Section 3.9 (Livestock Grazing); see also EIS Appendix 3 (Issues Analyzed in Brief).
11598-11	Idaho Conservation League	Wildlife and Natural Habitats General Wildlife Comments ICL appreciates that the project area is located outside Greater Sage-grouse Priority and Important Habitat Management Areas, Wilderness Study Areas, Areas of Critical Environmental Concern and known habitat for threatened and endangered species. ICL supports the continued use of this initial screening process to look for potentially suitable sites, but the process should also consider additional wildlife issues. Despite this area being previously impacted to various degrees by habitat degradation and fragmentation, there are still a number of wildlife species present that could be adversely affected, including a small population of sage-grouse, other avian species associated with sagebrush steppe ecosystems, pygmy rabbits, bats and ungulates such as pronghorn and mule deer. Potentially affected reptiles and amphibians include sagebrush short horned lizards, desert horned lizards, western rattlesnakes, western toads, and northern leopard frogs. Loss of sagebrush, compaction of soils, and destruction of ground burrows from construction of the Lava Ridge project could result in declining populations of native reptiles in the project area. Alteration of the landscape for turbine construction could reduce moist locations that are essential for amphibian survival. Any landscape level analysis of how to best meet our region's energy goals must include a robust discussion of how project proposals can avoid, minimize and mitigate anticipated impacts to Idaho's wildlife resources. A full inventory of BLM lands eligible for energy project proposals should be made by evaluating factors necessary to maintain health and integrity of the sage-steppe ecosystem while also providing for the region's growth and energy needs. Due to historic land use practices, wildfire, invasive plants, development pressures and climate change, this unique ecosystem is rapidly vanishing in size, connectivity and resiliency. Areas of highest quality wildlife habitat and connectivity should be prioritized for protection and restoration, and taken into consideration during project evaluation. The wildlife resource component of a lands inventory that screens for appropriate project locations must include site, species and seasonality dimensions of plant and animal life history characteristics. A comprehensive regional solar and wind development plan must include additional research and analysis of wildlife impacts that involves input from the Idaho Dep't of Fish & Game, other federal agencies and a wide variety of NGOs. This work should also consider and predict outcomes based on cumulative, aggregated effects of potential future projects. During evaluation, specific proposals should include long-term baseline monitoring, smart macro/micro-siting, and iterative impact avoidance strategies as well as mitigation strategies to provide a net conservation gain wherever possible. Best attempts should be made to assess both local and population-level impacts, as preconstruction modeling expectations may not correlate to evidence gathered after during and after construction and operation. In summary, there are no current alternatives that would adequately avoid and minimize Lava Ridge project impacts to wildlife resources and, as has been stated in other sections of this comment, ICL asks the BLM to conduct a supplemental DEIS. Development of new alternatives should include the following elements during analysis: ● needs analysis of wildlife population impacts, migrations and connectivity at the population level ● analysis of seasonal, weather, day-period shutdowns and curtailments to account for migrations and feeding habits of avian species and bats ● analysis of species-site-season characteristics while addressing potential wildlife effects, as well as design elements and inter-annual observations (Schuster et al. 2015)4 ● consider low reproduction rates of some species ● use most recent IDFG data on big game (migrations, densities, populations impacts), including avoiding the Owinza pronghorn migration route ● large-scale mitigation opportunities for long-term landscape-level wildlife displacement and irreversible/irretrievable impacts ● include cultural and recreational considerations into wildlife analysis during construction, operations and maintenance of project facilities ● construction timing as partial minimization ● include nonphysical project impacts on wildlife such as ground vibration, noise, shadow flicker ● no new access roads should be left in place permanently	The impacts to wildlife from the construction, operation, and decommissioning of a wind energy facility vary greatly between species and depend on a number of species- and site-specific variables. This EIS tiers to BLM (2005:5-43), which concluded that "Any effects of habitat reduction, disturbance, or fragmentation on wildlife would be related to the type and abundance of the habitats affected and to the wildlife that occur in those habitats. For example, on large sites (e.g., 1,000 acres [405 ha] or more), habitat effects could represent a significant impact to local wildlife, especially to species whose affected habitats are uncommon and not well represented in the surrounding landscape. In contrast, fewer impacts would be expected, in general, for wind projects located on previously disturbed lands that have not been adequately restored or reclaimed (e.g., open pit mining sites)." BLM (2005:5-43) also concluded that "The overall affect [sic] of construction-related injury or death on local wildlife populations would depend on a number of factors. The number and types of species present at the site that could be affected would be a function of the habitat that could be disturbed. The abundance of the affected species on the site and in surrounding areas would have a direct influence on population level effects. Impacts to common and abundant species may be expected to have less population-level effects than would the loss of individuals from a species that is uncommon. The greater the size of the project site, the greater the potential for more individual wildlife to be injured or killed. Finally, the timing of construction activities could directly affect the number of individual wildlife injured. For example, construction during the reproductive period of ground-nesting birds, such as sage-grouse, would have a greater potential to kill or injure birds than would construction at a different time." To comply with 40 CFR 1502.2(b), EIS Chapter 3 (Affected Environment and Impacts) discloses impacts to wildlife that have the potential to be significant, while EIS Appendix 3 (Issues Analyzed in Brief) discloses impacts to wildlife that are unlikely to be significant. Since mature sagebrush steppe vegetation and ephemeral aquatic habitats are the most limited and important habitat types in the region, EIS Chapter 3 focuses on special-status species (i.e., those with small, declining, or vulnerable populations) that depend heavily on those habitat types (e.g., western toad, greater sage-grouse, and pygmy rabbit). Additional discussion is provided in EIS Appendix 3 for special-status species that are less likely to experience population-level impacts and for habitat impacts that are unlikely to be significant. The potential impacts to special-status wildlife, and those that depend on sagebrush steppe habitats in particular, were carefully considered during project siting and the development of the range alternatives analyzed in the EIS, including the new Preferred Alternative analyzed in the final EIS. In addition to MVE's applicant-committed measures, the BLM has developed a number of other mitigation measures to minimize or avoid impacts to wildlife that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]). These include both measures to limit disturbance in sensitive habitats, as well as timing restrictions to avoid impacts during times when wildlife are most vulnerable, and adaptive management measures such as curtailment. EIS Chapter 3 (Affected Environment and Impacts) addresses the analysis elements listed in the comment.

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11598-14	Idaho Conservation League	mphibians Much of the amphibian habitat in the project area is seasonal and/or ephemeral, including canals, excavated tanks, vernal pools, playas and other wetlands. The 14,000 acre analysis area has been surveyed to varying degrees, but some data presented is over 15 years old. Nevertheless, at least one IDFG Tier 2 SGCN species, the western toad, has been observed in the project area. Other species recorded include Great Basin spadefoot, boreal chorus frog, and Sierran treefrog. Due to conversion of native vegetation and endemic wetland areas into a predominantly agricultural regime, it is presumed that much of the breeding habitat in the analysis area has been lost - likely decades ago. However, conclusions in the DEIS show that opportunistic amphibians continue to use habitat where it can support their needs. BLM and MVE should conduct further investigations into functional amphibian habitat in the analysis area. Appropriate safeguards against threats such as runoff, sedimentation, increased road densities/traffic and acoustic masking effects must be implemented from the beginning of construction to protect what might remain of possible breeding habitat. Because potential amphibian habitat represents such a small area compared to other wildlife, thoughtful efforts to minimize impacts could lead to positive outcomes for populations that do exist. Proposed actions described in Alternative B's "additional measures" are the type of minimization tactics that would be helpful, including establishing sufficient breeding habitat buffers. We also recommend that dormant equipment should not be left in wetlands or other possible amphibian habitat for any period of time.	As described in Section 3.18.3.2.2 (Amphibians, Alternative B with Additional Measures), these additional measures would be included in the terms and conditions of the ROW permit if a ROW is granted and Alternative B is selected; Alternatives C–E and the Preferred Alternative would also implement these measures. EIS Appendix 4 (Mitigation) describes additional measures that would be implemented to minimize or avoid impacts to wetlands, including additional measure vvv in Table App4-4, which states, "Equipment would not be left in a wetland or watercourse overnight or for a period of no longer than 12 hours to minimize the potential for spills or leaks." Also, additional measure cc states, "For amphibian habitat avoidance, MVE would survey for amphibians and their breeding habitat within 330 feet of all wetlands in the ground disturbance footprint beginning at the outer edge of hydric vegetation and wetland soil. If breeding habitat is occupied, MVE would coordinate with BLM to identify appropriate mitigation measures before construction." This measure would be required under Alternatives C–E and the Preferred Alternative and would be considered as additional mitigation for Alternative B. Additionally, as specified in applicant-committed measure 123, "Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts would be submitted to the appropriate regulatory agency. MVE would implement the applicable U.S. Army Corps of Engineers (USACE), Idaho Department of Water Resources (IDWR), and BLM standards (e.g., erosion and sediment control measures, culverts sized in accordance with USACE and BLM standards, etc.) for all road crossings or other work in wetlands or waters to ensure protection of water quality and to maintain the hydrology of affected areas."
11598-15	Idaho Conservation League	Pygmy Rabbits Due primarily to impaired habitat conditions in much of their historic range, pygmy rabbits have been proposed for ESA-listing on three occasions in recent decades, most recently in March of this year. Pygmy rabbits are also listed as Tier 3 SGCN species in Idaho and have BLM Special Species Status designations in all regions of the Twin Falls Field Office. Although sections of degraded habitat in the 17,500 acre project analysis area were documented and characterized in the DEIS, there are still portions of the area that have not yet been surveyed. There are an additional 14,000 acres identified (West 2012a) as potential pygmy rabbit habitat located outside proposed siting corridors. In proposing any new alternatives in a supplemental draft EIS, ICL encourages additional survey efforts within and adjacent to siting corridors to better understand the extent of viable pygmy rabbit habitat in the area. Due in part to a lack of recent data, the DEIS notes that no conclusions can be made at this time about the presence of pygmy rabbits in the area. Further degradation of the quality and connectivity of the already compromised landscape could preclude habitat utilization and genetic exchange within any breeding populations that may be present. It is also important to understand more about pygmy rabbit populations in the area because proposed techniques to minimize impacts such as flushing individuals from burrows and relocation to areas of suitable habitat would likely be difficult after construction was already initiated. Those techniques would be equally as problematic for species like greater sage-grouse, which the DEIS points out share similar habitat requirements to pygmy rabbits. Pygmy rabbits have not evolved to adapt to large landscape disturbances within their home range. Because of this, there are predation risks associated with long-range dispersal strategies, in the event that individuals or small populations become displaced during project construction or operations. ICL asserts that more habitat and population analysis study work is needed, given the fragmented nature of habitat near the project area and the likelihood that MVE's proposed activities would create further barriers to pygmy rabbit movement. Given pygmy rabbits use a life history strategy predicated on burrowing, noise from turbine operations and extensive road networks are another potential disturbance factor mentioned in the DEIS that may be difficult to minimize or mitigate. Adding to habitat threats is the recently documented presence of disease within pygmy rabbit populations, including rabbit hemorrhagic disease virus 2 (RHDV2) and sylvatic plague.9 Due to a combination of all these factors and the imperiled status of pygmy rabbits across their historic range, the BLM should be concerned that there is not better information on this species in the project area. ICL believes these issues should be addressed through a Supplemental DEIS.	Impacts to sensitive wildlife, including pygmy rabbit and greater sage-grouse, were given careful consideration during project siting and the development of the range alternatives analyzed in the EIS. In addition to MVE's applicant-committed measures, the BLM has identified a number of other mitigation measures to minimize or avoid impacts to wildlife (including pygmy rabbit and greater sage-grouse) that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]). Specific to pygmy rabbit, while there was insufficient data to conclusively state that pygmy rabbits do not currently inhabit the 3,500 acres of unsurveyed pygmy rabbit habitat in the siting corridors, EIS Section 3.18.4 (Pygmy Rabbit) describes the low likelihood that large populations are present based on the lack of recent observations (despite MVE's targeted site-specific surveys in suitable pygmy rabbit habitat) and the generally poor habitat conditions that have arisen from the combined effects of past fire, reseeding efforts, livestock grazing, and human development. Additional pygmy rabbit surveys would be required prior to construction (additional measure eee) and additional measures to avoid or minimize impacts to any occupied habitat identified during these surveys; see EIS Section 3.18.4.2.2 (Pygmy Rabbit, Alternative B [Proposed Action]) and EIS Appendix 4. Thus, as stated in EIS Section 3.18.4.2.7 (Pygmy Rabbit, Cumulative Effects), "Because all action alternatives include measures to identify and avoid occupied pygmy rabbit habitat or otherwise mitigate impacts, and because there are unlikely to be large populations of pygmy rabbits in the analysis area, it is unlikely that the project's contribution to cumulative effects to pygmy rabbits and their breeding habitat would cause a trend toward federal listing."
11620-5	Simone Griffin; BlueRibbon Coalition	BLM needs to adequately analyze the effects this project will have on birds, insects and other animals that migrate through this area and the harms that wind turbines have on them. It is shown through various studies that animals are harmed during the construction of wind farms as well as the use of wind farms. This is a long term change to wildlife and habitat that could greatly harm the wildlife and habitat BLM claims to protect.	Impacts to wildlife, including birds, insects, and migratory game, and the mitigation measures that would be implemented to minimize or avoid those impacts are described in EIS Sections 3.3 (Avian and Bat Species), 3.11 (Pollinators and Insects), and 3.18 (Wildlife); also see EIS Appendix 3 (Issues Analyzed in Brief) and EIS Appendix 4 (Mitigation).
11747-4	Eric Hess	4. Generated ground currents negatively affect all animal life.	While the publicly available literature indicates that EMF radiation may impact invertebrate activity (Friesen and Havas 2019; Levitt et al. 2022; Wyszkowska et al. 2019), the literature also indicates that the EMF radiation levels at ground-level beneath high-voltage (i.e., 500 kV) transmission lines and above buried medium-voltage (i.e., 230 kV) electrical cables is typically far below the threshold required to induce physiological or behavioral changes, but that flying insects within 1 meter (3.3 feet) of high-voltage transmission lines may be affected (Middleton and Barnhart 2023; Wyszkowska et al. 2016). Buried collector lines would be much lower voltage (i.e., 34.5 kV) and the surrounding soil would provide insulation from EMF radiation. Thus, impacts to wildlife from electrical currents associated with project infrastructure do not warrant further discussion in the EIS. Friesen, M., and M. Havas. 2019. Effects of non-ionizing electromagnetic pollution on invertebrates, including pollinators such as honey bees: what we know, what we don't know, and what we need to know. In *Working Landscapes. Proceedings of the 12th Prairie Conservation and Endangered Species Conference, February 2019, Winnipeg, Manitoba*, edited by D. Danyluk, pp. 127–138. Critical Wildlife Habitat Program, Winnipeg, Manitoba. Available at: https://stopsmartmetersbc.com/wp-content/uploads/2021/02/Effects-of-Non-ionizing-Electromagnetic-Pollution-on-Invertebrates-including-Pollinators-such-as-Honey-Bees-What-We-Know-Dont-and-Need-to-by-Margaret-Friesen-and-Magda-Havas-February-09-2021.pdf. Accessed January 5, 2024.

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			Levitt, B., H.C. Lai, and A.N. Manville II. 2022. Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. *Frontiers in Public Health*. Available at: https://www.frontiersin.org/articles/10.3389/fpubh.2022.1000840/full. Accessed December 19, 2023. Middleton, P., and B. Barnhart. 2023. *Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to Electromagnetic Frequencies from Buried Transmission Cables*. OCS Study BOEM 2023-007. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management. Wyszkowska, J., P. Grodzicki, and M Szczygiel. 2019. Electromagnetic fields and colony collapse disorder of the honeybee. *Przeglad Elektrotechniczny* 95(1):137–140. Available at: https://doi.org/10.15199/48.2019.01.35. Accessed January 19, 2024.
11782-7	Ken Fitch	For the Natural Resource issues, does the construction and operation create impacts beyond collisional takings and disruption of corridors both on land and in air that may be far greater when a larger diminished regional natural environment may be a factor- especially in this era of climate change?	See Table 3.4-3 in EIS Section 3.4.1.2.2 (Construction Greenhouse Gas Emissions, Alternative B) for estimates of the direct and indirect greenhouse emissions as well as Table 3.4-5 in EIS Section 3.4.2.2.2 (Operations Greenhouse Gas Emissions, Alternative B). In addition, EIS Appendix 4 (Mitigation) includes a list of the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment.
11849-4	Charles Brockway	The EIS does not adequately address the effect of construction activities, including sonic and subsonic shocks, on wildlife.	Impacts to wildlife from blasting are disclosed in EIS Section 3.18 (Wildlife) impacts to eagles from blasting are disclosed in EIS Section 3.3.3 (Eagles) and impacts to greater sage-grouse from blasting are disclosed in EIS Section 3.3.4 (Greater Sage-grouse); see also AIB-2 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). Blasting would be limited to twice a day during construction, and a number of measures would be implemented to minimize or avoid impacts from blasting, such as vibration; see EIS Appendix 4 (Mitigation) for a complete list of mitigation measures.
11871-6	WildLands Defense	There is minimum information on the surrounding landscape, and the degree of habitat fragmentation fragmentation that currently exists for native biota, as well as on the population of local and regional project-impacted species.	See the biological resource sections in EIS Chapter 3 (Affected Environment and Impacts) for an analysis of impacts to wildlife species; information on existing habitat disturbance and fragmentation is presented in the Existing and Future Trends and Actions and Cumulative Impacts sections.
11871-50	WildLands Defense	Year 1 Report Table 9 shows only 5 mammal species observed. It is impossible to believe that other species of lizards, gopher snakes, western chorus frogs, badgers, weasels, cottontail rabbits and jackrabbits, etc. were not observed. The EIS is devoid of any site-specific hard look analysis at the mammals, reptiles, amphibians and insects that may inhabit or migrate through this landscape. The report states that 15 species of concern observed – 6 associated with sagebrush habitat. This means that 9 are associated with the grasslands that BLM treats as a sacrifice zone here in order to try to wedge turbines in to a landscape where they should not be placed.	Table 9 in the year 1 Avian use study (WEST 2021a) lists non-avian wildlife observed incidentally during the first year of avian use surveys. See EIS Section 3.18 (Wildlife) for a description of mammals, amphibians, and reptiles that may occur in the siting corridors; bats and avian species are described in EIS Section 3.3 (Avian and Bat Species) and Table App3-2 and Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief), and pollinators and other insects are described in EIS Section 3.11 (Pollinators and Insects). Impacts to special-status avian species, including those that use grassland habitats, are disclosed in EIS Section 3.3 and Table App3-3 in EIS Appendix 3. Table App3-4 and Table App3-5 have been added to EIS Appendix 3 to provide details on other BLM-sensitive wildlife species. Mitigation measures to minimize or avoid impacts wildlife are listed in EIS Appendix 4 (Mitigation).
11871-62	WildLands Defense	WEST only recorded 3 mammal species observations pronghorn, Mule deer, Pite ground squirrel. There is no mammal study at all. Not even a mention of Cottontails, Jackrabbits, Voles, Kangaroo rats, and other species that are important prey for many raptor species.	See response to comment 11871-50 (see in Table A-3aa, Wildlife, including Big Game).
11871-83	WildLands Defense	Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations . Teff-Seker a b, O. Berger-Tal c, Y. Lehnardt c, N. Teschner b https://doi.org/10.1016/j.rser.2022.112801 “In terms of WTN effects on wildlife, the focus of this study, there is evidence that WTN could have negative impacts on habitat quality and wildlife [2]; Dooling et al., 2002; Dai et al., 2015). As onshore windfarms are often located in rural or other non-urban areas [19], the impact of WTN on the natural acoustic environment is particularly important. However, as shown below, while the potentially adverse effects of WTN on humans are being studied and regulated by planning and building laws, the same scrutiny has not been applied to examining or reducing potentially adverse effects of WTN on wildlife. The impact of noise pollution on wildlife is still largely ignored in environmental impact assessments (EIAs) during planning processes, and there is insufficient mapping of wildlife species and their noise sensitivity, even in areas considered biodiversity hotspots [2]”. And: “Potential effects of noise pollution and wind turbine noise on wildlife Noise pollution influences the acoustic environment even far from anthropogenic centers, in remote areas that include critical habitats for endangered species [20]. Noise pollution negatively impacts wildlife by disrupting mechanisms that are crucial for their survival [5,21,22]. In particular, noise can: 1) cause physiological damage such as chronic, high levels of stress hormones [23], or actual hearing loss [24]; 2) be directly perceived by animals as a threat, causing them to increase costly anti-predatory behaviors at the expense of foraging, or flee the affected area altogether, leading to functional habitat loss [25]; 3) distract foragers, reducing their efficiency of finding and handling food (Dominoni et al., 2021); 4) hinder animal communication by reducing the distance at which a signal can be detected [26], limiting the ability of the signal to reach its intended recipient, and decreasing the amount of information that can be extracted from a signal, such as the sound of an approaching predator or potential prey [27,28]. These mechanisms are not mutually exclusive, and the role that each plays in determining the impact of noise pollution varies by species. Not all species react to noise in the same way, due to differing sensitivities to noise, context, and life-history [1,5]. Overall, noise pollution alters animals’ communities, reduces their overall survival and fitness, and contributes to the decline of global biodiversity [22]”. And: “Traffic is the most widely studied source of anthropogenic noise [29]. [32] compared the spectral properties of WTN and traffic noise, and suggested that a combination of highway noise and WTN might create	Impacts to wildlife from turbine noise and increased vehicle traffic in the siting corridors are disclosed in EIS Section 3.18 (Wildlife). Species-specific discussions are provided as appropriate (e.g., EIS Sections 3.18.2 [Big Game Habitats and Populations] and 3.18.4 [Pygmy Rabbit]). Impacts to sensitive avian species from noise are disclosed in EIS Sections 3.3.3 (Eagles) and 3.3.4 (Greater Sage-Grouse). See also AIB-2, AIB-8, and AIB-61 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). Additional species-specific analysis of noise impacts would be inconsistent with 40 CFR 1502.2. There are no ESA listed threatened or endangered species present in the siting corridors, nor are any proposed or designated critical habitats present. As stated by Teff-Seker et al. (2022), additional species-specific data on wind turbine noise impacts would need to be gathered to lead to more informed analyses and the development of mitigation measures; such investigations are beyond the scope of this EIS, which has been prepared with the best available scientific data. Teff-Seker, Y., O. Berger-Tal, Y. Lehnardt, and N. Teschner. 2022. Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations. *Renewable and Sustainable Energy Reviews* 168(2022):112801.

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		a greater, more complex disturbance, rather than one masking the other. Specifically, WTN alters the natural acoustic environment by inducing airborne loud broadband sound [33] which is within the hearing range of many animals [34], including most bird species [35]. A few other studies have also looked at the effects of WTN on other wildlife with mixed results. For example [36], found that WTN affects the California ground squirrel's antipredator behavior, causing a higher level of alertness attributed to loss of auditory capacities.	
11871-117	WildLands Defense	And: “Sound can be considered as either sound power or sound pressure. Sound power is the total acoustic power emitted by a source and can be used to predict how far the sound will travel and what the sound levels could be at various distances from the source. It is measured at the source, making it independent of the dB level where it is received. Conversely, sound pressure reflects the sound level received and perceived by the listener. And: The amplitude, frequency, and sequence (i.e., temporal pattern) of WTN can differ widely, and dramatically change the type and level of WTN impact on humans and wildlife. Most studies of the effects of WTN on people pertain to low-frequency noise, between 20 and 200 Hz. Outdoor WTN levels upwards of around 40 Hz normally exceed the hearing thresholds of indoor areas, although this might vary depending on noise insulation standards [48]. Sound frequency is also important when addressing WTN effects on wildlife, since WTN is usually characterized by a broad band range, with changes in the WTN spectrum observed in the frequency range of 200–5000 Hz [49], which overlaps with the hearing range of many wildlife species [34], particularly birds [35].	Impacts to wildlife from turbine noise are disclosed in EIS Section 3.18 (Wildlife), which concluded that there would be long-term effects to wildlife use in the siting corridors due to turbine noise. Avian species would experience similar effects, though the frequency of avian collisions with operational turbines indicates that most species are likely to continue using the siting corridors during long-term operations.
11873-9	Mary Schwartz, Frank Schwartz	9. The DEIS does not estimate the impacts to reptiles and other wildlife during the construction phase. The construction activities will obviously kill a significant number of snakes, lizards, mammals, insects, etc. during the road building, site preparation and vehicular and equipment traffic during the construction period. Impacts to this fauna will continue during the operations and decommissioning phases. This environmental impact for all project phases should be addressed in the DEIS.	EIS Section 3.18.1.2 (Wildlife Movement [non-game mammals and reptiles], Impacts) discloses the potential for injury or mortality of wildlife from vehicle strikes on project access roads as well as indirect effects related to noise and human presence during all phases, including specific discussion of impacts to reptiles.
11873-11	Mary Schwartz, Frank Schwartz	11. The DEIS does not address the impact of emf and vibration from the wind turbines on the impaired navigation of birds, bats, bees and other flying insects. The DEIS is incomplete without addressing the potential significance of this impact.	While the publicly available literature indicates that EMF radiation may impact invertebrate activity (Friesen and Havas 2019; Levitt et al. 2022; Wyszkowska et al. 2019), the literature also indicates that the EMF radiation levels at ground-level beneath high-voltage (i.e., 500 kV) transmission lines and above buried medium-voltage (i.e., 230 kV) electrical cables is typically far below the threshold required to induce physiological or behavioral changes, but that flying insects within 1 meter (3.3 feet) of high-voltage transmission lines may be affected (Middleton and Barnhart 2023; Wyszkowska et al. 2016). Buried collector lines would be much lower voltage (i.e., 34.5 kV) and the surrounding soil would provide insulation from EMF radiation. Thus, impacts to wildlife from electrical currents associated with project infrastructure do not warrant further discussion in the EIS. There is no publicly available literature documenting impaired avian or bat navigation from EMF radiation associated with wind turbines and transmission lines, nor any literature to support the conclusion that vibrations from turbines affect the navigation of any wildlife. Friesen, M., and M. Havas. 2019. Effects of non-ionizing electromagnetic pollution on invertebrates, including pollinators such as honey bees: what we know, what we don't know, and what we need to know. In *Working Landscapes. Proceedings of the 12th Prairie Conservation and Endangered Species Conference, February 2019, Winnipeg, Manitoba*, edited by D. Danyluk, pp. 127–138. Critical Wildlife Habitat Program, Winnipeg, Manitoba. Available at: https://stopsmartmetersbc.com/wp-content/uploads/2021/02/Effects-of-Non-ionizing-Electromagnetic-Pollution-on-Invertebrates-including-Pollinators-such-as-Honey-Bees-What-We-Know-Dont-and-Need-to-by-Margaret-Friesen-and-Magda-Havas-February-09-2021.pdf. Accessed January 5, 2024. Levitt, B., H.C. Lai, and A.N. Manville II. 2022. Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. *Frontiers in Public Health*. Available at: https://www.frontiersin.org/articles/10.3389/fpubh.2022.1000840/full. Accessed December 19, 2023. Middleton, P., and B. Barnhart. 2023. *Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to Electromagnetic Frequencies from Buried Transmission Cables*. OCS Study BOEM 2023-007. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management. Wyszkowska, J., S. Shepherd, S. Sharkh, C.W. Jackson, and P.L. Newland. 2016. Exposure to extremely low frequency electromagnetic fields alters the behaviour, physiology, and stress protein levels of desert locusts. *Scientific Reports* 6:36413. Available at: https://doi.org/10.1038/srep36413. Accessed January 19, 2024. Wyszkowska, J., P. Grodzicki, and M Szczygiel. 2019. Electromagnetic fields and colony collapse disorder of the honeybee. *Przeglad Elektrotechniczny* 95(1):137–140. Available at: https://doi.org/10.15199/48.2019.01.35. Accessed January 19, 2024.
11911-1	Eila Olmstead	The majestic plateaus and landscapes of Southern Idaho, while beautiful, are also incredible habitat for a wide variety of creatures and provide a crucial corridor of uninterrupted nature for wildlife. The DEIS inadequately addresses the impact of blasting and the frequency of blasting (2x per day over a 2 year construction period) on the wildlife in/and that migrate through the project area. Not to mention the impact to grazing, breeding/calves, and general stress to the cattle industry.	As stated in EIS Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B), “Blasting would also occur approximately twice per day during the 2-year construction period. While individual blasts may disturb or displace wildlife, they would be unlikely to lead to long-term effects on wildlife movement because blasting would not occur repeatedly in the same area over a long period of time.” Additional species-specific discussion is provided in EIS Sections 3.18.2.2 (Big Game Habitats and Populations, Impacts) and 3.3.3.2 (Eagles, Impacts). Impacts to livestock grazing from blasting are described in EIS Section 3.9.2.2.2 (Physiological Effects to Livestock, Impacts). See also AIB-2 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief).

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11969-2	Jessica McDonald	The Lava Ridge EIS fails to adequately address potential damage and mitigation of damage to our wildlife. In the EIS it specifically states that it will kill federally protected bald eagles that live in the area. This is only the one species I am referencing from the EIS, but there are many more species of birds, eagles, and land-dwelling creatures that are going to be impacted and ultimately killed as well. While some findings are listed in the EIS there are many issues that are not mentioned. You, the BLM, know this area is too valuable to the lives of all inhabitants of Southern Idaho to be compromised.	See EIS Appendix 3 (Issues Analyzed in Brief) for a description of issues and species analyzed in brief.
11971-3	Heidi Mickelson	The damage to the environment and to the wildlife in the area is a huge concern and does not appear to have been adequately addressed in the EIS.	Effects to wildlife are disclosed in EIS Sections 3.3 (Avian and Bat Species), 3.11 (Pollinators and Insects), and 3.18 (Wildlife), and in EIS Appendix 3 (Issues Analyzed in Brief). Mitigation measures that would be implemented to minimize or avoid impacts to wildlife are listed in EIS Appendix 4 (Mitigation).
11978-46	Magic Valley Energy, LLC	Section 3.18.3.2.2 Wildlife – Amphibians (Alternative B with Additional Measures) 43. The DEIS states: "Additional measures that would minimize impacts to amphibians are listed in Table App4-4 in EIS Appendix 4 and include the following" a. MVE Comment: The Project siting corridors occur within an area largely categorized as desert sagebrush steppe habitat that is substantially impacted by livestock and invasive and noxious weed species, with relatively few aquatic resources to support amphibian populations. Based on the analysis presented in the DEIS, MVE contends that the Project's impacts to amphibian species populations are minor to negligible and do not warrant detailed analysis, much less a set of BLM-required additional mitigation measures as set forth in the DEIS. As drafted, the DEIS analyzes potential impacts to five amphibian species: western toad, Great Basin spadefoot, boreal chorus frog, Sierran treefrog, and Northern Pacific chorus frog, only one of which (western toad) has actually been documented to occur within the Project siting corridors. The IDFG and BLM conservation status for each species is listed below19: • Western toad – State Rank S2 (Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction; typically 6 to 20 occurrences); IDFG Tier 2 SGCN; BLM sensitive species; MVE also notes that the western toad holds a global rank designation of G4 (apparently secure) • Great Basin spadefoot – State Rank S4 (Not rare and apparently secure, but with cause for long-term concern; usually more than 100 occurrences); not a BLM sensitive species • Boreal chorus frog – State Rank S4 (Not rare and apparently secure, but with cause for long-term concern; usually more than 100 occurrences); not a BLM sensitive species • Sierran treefrog – State Rank S5 (demonstrably widespread, abundant, and secure); not a BLM sensitive species • Northern Pacific chorus frog – Not listed in the IDFG Species Conservation Status web tool; described in the DEIS as the most commonly identified amphibian species in IDFG's inventory in southwest Idaho; not a BLM sensitive species Of the five species analyzed in the DEIS, four are common amphibian species, including the Great Basin spadefoot, boreal chorus frog, Sierran treefrog, and northern Pacific chorus frog. The only amphibian species with a special status designation noted in the DEIS is the western toad (Anaxyrus boreas), which is a species found throughout the Western United States and is listed as a Tier 2 SGCN by IDFG and as a sensitive species for the BLM SFO. Per the DEIS, western toads are primarily terrestrial but are typically found near a permanent water source. However, the DEIS explains that the only sources of permanent surface water in the analysis area are human made features such as irrigation canals and stock tanks that generally lack suitable substrates or vegetation for egg laying. Given this, the DEIS concludes that the analysis area does not provide suitable breeding habitat for the western toad; thus, there would be little to no impact to breeding habitat for the species (permanently wet areas) under any of the action alternatives, even without the additional measures listed by BLM in the DEIS. Also, based on the analysis in the DEIS, there is no concern expressed that the Project would have any significant impacts or affect any amphibian species such that the population of the species would trend downward toward causing the species to become listed as endangered or threatened. Based on this set of facts, MVE requests that BLM move the analysis of amphibian impacts to Appendix 3 of the FEIS (Issues Analyzed in Brief). With no significant impacts for any amphibian species documented in the DEIS and no suitable breeding habitat for the western toad present in the analysis area, and considering that BLM's mitigation principles call for mitigation measures to be commensurate with the level of impact to the environmental resource, the Project's minor to negligible level of potential impact to amphibian species does not warrant additional mitigation measures beyond those measures committed to by MVE in the Plan of Development, including, but not limited to, the key measures listed below that will have the effect of avoiding and minimizing impacts to amphibian species: • Per the provisions of Applicant-Committed Measure #3, reduce or avoid impacts to ecologically important habitats. • Per the provisions of Applicant-Committed Measure #117, MVE will protect water quality by preparing and implementing a stormwater pollution prevention plan (SWPPP) in accordance with federal, state, and local regulations, which will be approved by the BLM. • Per the provisions of Applicant-Committed Measure #120, where impacts on wetlands are not avoidable, MVE will prepare and submit site-specific crossing plans and measures to mitigate impacts to the appropriate regulatory agency. MVE will implement the applicable U.S. Army Corps of Engineers (USACE), Idaho Department of Water Resources (IDWR), and BLM standards (e.g., erosion and sediment control measures, culverts sized in accordance with USACE and BLM standards, etc.) for all road crossings or other work in wetlands or waters to ensure protection of water quality and to maintain the hydrology of affected areas. • Per the provisions of Applicant-Committed Measure #121, MVE will design access roads to minimize stream crossings where feasible. Where practical, structures crossing streams would be designed to not decrease channel stability or increase water velocity. • Per the provisions of Applicant-Committed Measure #124, MVE will design access roads to be located away from drainage bottoms and avoid wetlands, if practical. If drainage bottoms and wetlands cannot be avoided, appropriate design features would be used to reduce erosion and sedimentation. • Per the provisions of Applicant-Committed Measure #133, MVE will avoid ground disturbance within 100 feet of wetlands, streams, and riparian areas and prepare BLM-approved	As described in EIS Section 3.18.3 (Amphibians) the issue analyzed in the EIS includes both effects to amphibian populations and amphibian breeding habitat in the siting corridors; the primary impact indicator for the analysis is acres of ground disturbance in potential amphibian breeding habitat. As described in EIS Section 3.18.3.2.2 (Amphibians, Alternative B), BLM (2005) states "any habitat effects could represent a significant impact to local wildlife, especially to species whose affected habitats are uncommon and not well represented in the surrounding landscape" (BLM 2005:5–43). Although amphibian species that occur in the analysis area use a variety of upland habitats outside the breeding season, all of these species rely on vegetated aquatic habitats for reproduction. Because these habitats are uncommon in the analysis area, amphibians may be disproportionately affected by the loss or alteration of these habitats due to the project. Thus, while BLM (2005) provides sufficient disclosure and analysis of the effect of habitat loss on general wildlife species (and thus was not analyzed in detail; see AIB-61 in EIS Appendix 3), additional site-specific discussion of potential impacts to amphibian breeding habitat is warranted." As described in EIS Section 3.18.3.1, several amphibian species that may occur in the siting corridors are capable of dispersing long distances across dry upland habitats and opportunistically select nesting sites based on the availability of surface water; this is especially important for the Great Basin spadefoot, which relies on "explosive" breeding seasons in particularly wet years (when vernal pools and playas are inundated). Thus, it would be inappropriate to conclude that the siting corridors do not provide breeding habitat for amphibians because they lack large, permanent surface waters. As described in EIS Section 3.18.3.2 (Amphibians, Impacts), none of the action alternatives are expected to result in population-level impacts to amphibians. While BLM appreciates that MVE has committed to a number of measures to minimize or avoid impacts to surface water, wetlands, and other important habitats in the siting corridors, these measures lack specificity and enforceability. Further, preconstruction baseline resource surveys only sampled a portion of the ephemeral surface water features in the siting corridors and surveys were not designed to detect potential amphibian breeding habitat. The only additional mitigation measure the BLM would require for amphibians is preconstruction surveys of potential amphibian breeding habitat and avoidance or mitigation of impacts to occupied habitat (additional measure cc; see EIS Section 3.18.3.2.2 [Amphibians, Alternative B with Additional Measures]). Since MVE's other applicant-committed measures would limit development in areas considered potential amphibian breeding habitat (i.e., within 330 feet of wetlands, riparian areas, and surface water), these surveys would only be required in the limited instances where avoidance of such habitats is not feasible.

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		site-specific plans and measures to mitigate these impacts for any surface disturbances within 100 feet of wetlands, streams, and riparian areas. • Per the provisions of Applicant-Committed Measure #138, no turbines would occur within 1,000 feet of irrigation canals to minimize impacts to bats and avian species attracted to such features. Based on the foregoing, whether or not BLM moves the amphibian analysis to the Issues Analyzed in Brief appendix of the FEIS, MVE requests that BLM remove the additional amphibian-related mitigation measures in Section 3.18.3.2.2 in the FEIS and Appendix 4 Table App4-4 Additional Measure "t" as these measures are not warranted based on the minor to negligible impacts to amphibian species documented in the DEIS and the extensive Applicant-Committed Measures that MVE will implement that will protect amphibians.	
11978-47	Magic Valley Energy, LLC	44. The DEIS states: "Under Alternative B, approximately 1,164 acres of potential amphibian breeding habitat would be disturbed by the project (8% of the habitat in the analysis area) (Table 3.18-4)." a. MVE Comment: The FEIS should explain how this acreage of potential amphibian breeding habitat was calculated. In addition, MVE suggests that the IDFG inventory, which found only 15% of vernal pools were actually sufficient breeding habitat, be incorporated into this analysis if BLM has not already done so.	See response to comment 11978-46 (see in Table A-3aa, Wildlife, including Big Game). The methodology for calculating disturbance acreages presented in EIS Chapter 3 (Affected Environment and Impacts) is described in EIS Section 3.1.2.3 (Introduction and Methodology, Siting Corridors). The suitability of vernal pools for amphibian breeding varies between years based on the extent and duration of inundation and without systematic surveys of all ephemeral surface waters in the siting corridors, it is impossible to determine which should be excluded as potential amphibian breeding habitat. Due to the variability in this habitat and the lack of systematic preconstruction surveys, the BLM would require preconstruction surveys in potential amphibian breeding habitat and mitigation of impacts to occupied habitat (additional measure cc).
11978-142	Magic Valley Energy, LLC	44. Section 3.18.1.3 Wildlife - Irreversible and Irretrievable Commitments and Short Term Uses Versus Long Term Productivity "All action alternatives would have irretrievable impacts on wildlife movement from habitat loss and fragmentation caused by ground disturbance for up to 84 years (34-year life of the project plus 50 years for vegetation to reestablish after final reclamation)." MVE notes that reclamation should be stated as 'up to 50 years' for reclamation activities, and as reclamation could be met prior to 50 years. MVE requests the language be changed: "All action alternatives would have irretrievable impacts on wildlife movement from habitat loss and fragmentation caused by ground disturbance for up to 84 years (34-year life of the project plus up to 50 years for vegetation to reestablish after final reclamation)."	Revised as requested.
11978-144	Magic Valley Energy, LLC	46. Section 3.18.3 Wildlife - Amphibians "For this analysis, amphibian breeding habitat is defined as riparian or wetland vegetation (Figure 3.18-6), water features (including irrigation canals), and the area within 330 feet (50 m) of these vegetation types and water sources." MVE asks the conversion be corrected: "For this analysis, amphibian breeding habitat is defined as riparian or wetland vegetation (Figure 3.18-6), water features (including irrigation canals), and the area within 330 feet (100 m) of these vegetation types and water sources."	Typo corrected.
11978-145	Magic Valley Energy, LLC	47. Section 3.18.3.2.6 Wild Life - Cumulative Impacts "As described above, approximately 86% of the analysis is disturbed (contains roads and other development); is an existing ROW; has been converted to agriculture or rural residential; is dominated by nonnative vegetation; is proposed for other renewable energy development; or has been subjected to wildfire, vegetation treatments, and reseeding." MVE asks the word 'area' be inserted for ease of reading: "As described above, approximately 86% of the analysis area is disturbed (contains roads and other development); is an existing ROW; has been converted to agriculture or rural residential; is dominated by nonnative vegetation; is proposed for other renewable energy development; or has been subjected to wildfire, vegetation treatments, and reseeding."	Typo corrected.
11978-160	Magic Valley Energy, LLC	62. Appendix 4- App4-2n, #142 "Avian diverters would be installed and maintained on all guy wires/lines of all existing or any new temporary meteorological (Met) towers, and where guy wires are necessary, appropriate guy guards would be installed at the base of the guy wires." MVE requests the addition of specifying language to match the USFWS 2022: "If applicable, avian diverters will be maintained on all guy wires/lines of all existing or any new temporary meteorological (Met) towers, and where guy wires are necessary, appropriate guy guards would be installed at the base of the guy wires."	The measure appears as written in the BBCS (Appendix M in MVE [2023]) and has not been revised.
12004-3	Douglas Miller	Further, the draft EIS does not address the impacts on Idaho's imperiled and endangered anadromous fishes (e.g., salmon and steelhead) which rely of large volumes of water being kept in the Snake River, particularly to assist downstream migration of smolts and stabilizing water temperatures to aid upstream migration of adults (see http://www.snakeriversalmonsolutions.org/Idaho's_Contribution.aspx <https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.snakeriversalmonsolutions.org%2FIdaho%27s_Contribution.aspx&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C9b7b11daa5d5499ecdfb08db41b2d6a5%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638176008583883772%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Lb2chyUQfstvdLxcC%2FpzautdxrXwFPKTegMKDqjMlNY%3D&reserved=0> .) Lava Ridge will deprive Idaho's anadromous fishes of the lifegiving water they require. Since a comprehensive analysis of the impact of Lava Ridge on Idaho's anadromous fishes has not been conducted and made available for public review and comment, Alternative A "No Build" is the only acceptable option.	Additional information was added to EIS Appendix 3 (Issues Analyzed in Brief) under AIB-55 and AIB-56 to address impacts to fish species. AIB-55: How would the project affect fish species and associated in-stream habitat? AIB-56: How would the project water use and blasting affect fish species, including salmon and steelhead (listed under the ESA)?
12054-7	Kevin Emmerich	Equally, BLM should consider curtailment alternative for wildlife during different activity periods. This would require the applicant to shut down operations during important wildlife activity. These could include curtailment during golden eagle nesting, curtailment near sage grouse leks, curtailment during spring and fall migration for birds and curtailment during pronghorn wintering.	Curtailment has been included as an adaptive management measure under all action alternatives; as described in the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation), the results of postconstruction avian and bat fatality monitoring would inform the development of species-specific curtailment strategies and technologies (e.g., sensor-based curtailment).

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12142-3	Michael Taylor	Disruption or damage to this could destroy our agricultural way of life. Also the environmental impact upon our desert wildlife. How will this impact, migrating elk, mule deer, migratory birds and raptors?	See EIS Section 3.18.2 (Big Game Habitats and Populations) for a discussion of impacts to big game habitats and populations; impacts to migratory birds and raptors are discussed in EIS Section 3.3.2 (Avian Populations); see also EIS Section 3.3.3 (Eagles), EIS Section 3.3.4 (Greater Sage-Grouse), and EIS Appendix 3 (Issues Analyzed in Brief).
12201-4	Renee Kuross	In addition, several of the proposed turbines would be located adjacent to seasonal wetlands and watering areas, whose disruption will further increase the loss of wildlife	The exact locations of turbines have not been determined at this time; the EIS analyzes siting corridors in which turbines and other project infrastructure would be placed; see EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction). A number of mitigation measures would be implemented to limit the placement of turbines and other project infrastructure in the vicinity of wetlands, surface water, and other important habitat features in the siting corridors; see EIS Appendix 4 (Mitigation).
12220-1	Matt Bridges	According to the Lava Ridge Wind Project DEIS, the Burrowing Owl was listed as a “Species Analyzed in Detail” (Volume 1, Section 3.3.2.1.2, Species Analyzed in Detail, p. 3-80). However, this analysis failed to include Nesting. In Table 3.3-4, Occupied (non-Eagle) Raptor Nests within 1 Mile of Siting Corridors, Burrowing Owl nests were not targeted during the study; however nests were observed incidentally during two other biological surveys. In fact, nests were not targeted during either year of survey. Page 3-67 of the DEIS states ”the species analyzed in detail in this EIS meet all three of the following criteria: 1. The species has been observed in the siting corridors or has the potential to occur in the siting corridors because breeding, foraging, or migratory stopover habitat for the species is present and the species has been recorded in similar habitats within 4 miles of the siting corridors. 2. The species has a moderate to high potential of colliding with turbines based on if and how the species uses the RSH (rotor-swept height) and the frequency with which the species has been detected as fatalities at existing wind energy facilities. 3. The species has one or more demographic characteristics that make it susceptible to small increases in mortality; namely, they have a small and declining population in BCR 9, are long-lived, have a low reproductive rate, and are dependent on high annual survivorship to sustain their population.” The Burrowing Owl clearly meets these minimum requirements. Why was Nesting not studied for this owl? The USFS lists the Burrowing Owl as a National Bird of Conservation Concern and designates high-priority conservation status to the species in five Bird Conservation Regions relevant to USFS Region 2 (BCR 9.11,16,17,18), Idaho state rank of S2B Species of greatest Conservation Need Tier 2, Bureau of Land Management Sensitive Species Type 2 and Idaho Wildlife Classification Protected Nongame. The burrowing owl is a migrating bird, and the Lava Ridge project site is in the northwestern part of the breeding area. This bird is classified as endangered in Canada and threatened in Mexico. The owl’s range is declining. Furthermore, the Burrowing Owl is misrepresented as “nocturnal”; it is diurnal. Being crepuscular in nature, The Burrowing Owl hunts for insects during the twilight hours. The addition of 486 miles of new roads increases the likelihood of fatality from a vehicle impact, especially during the low light hours when it is hunting. This owl uses dung to attract food in the form of bugs. Thus, changes in grazing and mammal migration affect available mammal dung to line their nest and vestibule of the burrow opening. The bird lives in a particular ecosystem and removal of grazing livestock from the area during project construction will greatly impact the Burrowing Owl’s nesting abilities. The DEIS suggestions for mitigation are to monitor the owl for two years, post construction, and to construct artificial nesting habitat off site. To monitor after the fact is ineffective. To attempt to relocate the breeding grounds of a migratory bird so it does not impact the project or vice-versa certainly impacts the land habitat and compromises the many uses of public lands. The public wants to see these amazing birds in their natural habitat. Please consider the fact that after construction is far too late to observe, evaluate and determine impact on a Species and to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. Why was the Burrowing Owl nesting ground not targeted in the survey? Due to the Burrowing Owl’s threatened status, a further, more thorough analysis needs to be conducted to determine the impacts the Lava Ridge wind project will have on its survival as a species.	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), the BLM would require MVE to implement targeted burrowing owl surveys prior to construction because of the lack of targeted surveys for these species during the avian use studies (BLM-required measure q; also see Table App4-4 in EIS Appendix 4 [Mitigation]).
12239-3	Lisa Bjerke	In addition, the project’s proximity to seasonal wetlands and wildlife watering areas will very negatively impact and most likely decrease the numbers of wildlife who formerly depended on those sites.	A number of mitigation measures would be implemented to limit the placement of turbines and other project infrastructure in the vicinity of wetlands, surface water, and other important habitat features in the siting corridors; see EIS Appendix 4 (Mitigation).
12307-15	Dean Dimond	Need analysis of effects on USFWS petitions to delist grizzlies and wolves now or future,	Neither of these species are present within the analysis area. These species have been added to the final EIS in Table App3-4 in EIS Appendix 3 (Issues Analyzed in Brief).
12307-24	Dean Dimond	New information detail of impacts on wildlife and fisheries from the state G&F Agency regarding impacts on wildlife corridors.	The analysis in the EIS is based on the best publicly available data, including MVE’s project-specific baseline resource surveys. As described in Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the State of Idaho (including IDFG) is a cooperating agency in the preparation of this EIS and was consulted in the development of the analysis of impacts to wildlife and the development of mitigation measures to minimize or avoid those impacts. The analysis of impacts to migratory big game used radiotelemetry data from collared animals collected by IDFG as part of studies that are ongoing at the time of this final EIS (see EIS Section 3.18.2 [Big Game Habitats and Populations]).
12307-27	Dean Dimond	New information regarding security, effects of fencing and large structures on human and wildlife access to federal lands,	As described in EIS Section 3.12 (Recreation), access to BLM land in the siting corridors would be temporarily restricted during the 2-year construction period, but access would be increased during the 30-year operation period due to the proposed road improvements and new access road construction; see also AIB-25 through AIB-28 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). Impacts to wildlife movement are disclosed in

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			EIS Section 3.18 (Wildlife). See response to comment 12307-24 (see in Table A-3aa, Wildlife, including Big Game) for a discussion of data sources evaluated in the EIS and coordination with IDFG.
12307-35	Dean Dimond	New information and specific changes in wildlife corridors on federal lands due to number of acres and densities of proposed project,	See response to comment 12307-24 (see in Table A-3aa, Wildlife, including Big Game).
12453-4	Alexia Deetz	This reminds me, neither the coyotes, jack rabbits or bees are mentioned in the above referenced “Impact Statement”, yet, they do live in the desert environment in question.	Impacts to general wildlife (including coyotes and rabbits) are discussed in EIS Section 3.18.1 (Wildlife Movement [non-game mammals and reptiles]), impacts to bees are disclosed in EIS Section 3.11.1 (Pollinators) and EIS Section 3.11.4 (Bureau of Land Management Special-Status Bumble Bees).
12469-7	Mike Telford	All the magic valley is growing in population. Some at alarming rates. Rupert and Paul on the east, Burley to the south, Hazelton/Eden and the greater Twin Falls area to the southwest, Jerome to the west and the Hailey/SunValley to the Northwest, Shoshone, and Dietrich nearest to the project. In the future this area even without the 380 plus miles of roads will see increased use. However, multiply use will end and the favor and enjoyment of a remote and somewhat wild area close to enjoy, will be dusty roads with little left to go for. This sitting in the heart of a growing population is ill conceived at best. The DIES makes no mention of these issues. The only justification is the ill-advised designation of an area suitable for energy development. To maintain a true multiple use area which is BLM’s stated mission on the cover of the DIES, the area will need further protections for wildlife. Fragile cultural sites for future generation to learn from and enjoy, will require protection. Next year will mark my 50th year farming and being a part of all this area every day. BLM personnel, while they are great, come and go. Studies come for a little while and draw sometimes short-term incorrect conclusions. The direction of the changes even without this destructive project have mostly not protected the resource. I can state unequivocally that every species except elk have declined. Birds, foxes, badgers, Burrowing owls, Hawkes. Antelope just to name a few. The DEIS recognizes that there will be impacts without addressing what if anything could be done. Over and over the DEIS declares that the impacts, although not precise, will not move the specie toward endangered status. All those assumptions and models are based on data, most of which is not even from the subject area. It may be true that nation wide of even statewide that may be true. However, for this area of unique high mountain desert park surrounded with growing population eager to experience it, it will be gone forever. Many of the species will be extinct in this entire area if this project is not stopped. The impacts of the roads disrupting the fragile environment from Jerome to Rupert and from mountains on the north, and south to the freeway will forever be altered. None of that is addressed adequately in the DEIS.	None of the alternatives in the EIS include designation of a renewable energy development zone or any other land use designation. The BLM’s purpose is to respond to MVE’s application for a ROW grant to construct, operate and maintain, and decommission a wind energy facility on public lands in compliance with FLPMA (see EIS Section 1.2 [Purpose and Need]); EIS Section 1.3 (Decision to be Made) describes the decisions to be made by the BLM. Cumulative impacts from continued population growth and human development is discussed throughout the Cumulative Impacts sections in the EIS Chapter 3 (Affected Environment and Impacts), as appropriate. However, the siting corridors are located on BLM land, which is generally unavailable for residential and other urban or rural development. Thus, most cumulative impacts associated with future development would occur outside the siting corridors. Impacts to wildlife are disclosed in EIS Sections 3.3 (Avian and Bat Species), 3.11 (Pollinators and Insects), and 3.18 (Wildlife); see also EIS Appendix 3 (Issues Analyzed in Brief). These sections summarize data sources evaluated in the impacts analysis, which include project-specific baseline resource inventories conducted by MVE over a period of 2 years. Additional site-specific information was obtained through a background literature search, coordination with state and federal agencies, and literature provided in public scoping comments. Each of these sections also describes how the implementation of mitigation measures would minimize or avoid impacts to wildlife and discloses any irreversible or irretrievable impacts (as defined in EIS Section 3.1.2.4 [Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity]) that would occur after the implementation of mitigation; see EIS Appendix 4 (Mitigation) for a complete list of mitigation measures.
12469-12	Mike Telford	The DEIS states that the corridors are .5 miles wide. While the roads may be much smaller than that the impacts to the entire half mile must be assumed and considering the terrain may well disrupt the entire corridor. There are many of the 27 species of animal that live or nest in the ground. Burrowing Owls, snakes, and rodents to name a few. Rodents are near the bottom of the food chain and not only are the direct destruction of habitat impacts not considered but there is nothing about the impacts of the one half mile strips cutting the habitat up and the effect on the food supply to birds of prey, snakes Badgers, and the like.	As described in EIS Section 3.1.2.3 (Introduction and Methodology, Siting Corridors), each of the action alternatives would disturb approximately 10% to 11% of the siting corridors. Impacts to wildlife movement, including impacts related to habitat fragmentation, are disclosed in EIS Section 3.18 (Wildlife). Additional discussion of impacts to wildlife habitat is presented in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). Loose soils created by ground disturbance during construction can improve habitat for burrowing mammals such as rodents; this can lead to increased prey availability for avian predators but can also put these predators at risk of turbine collisions when hunting. Therefore, a number of mitigation measures would be implemented to discourage burrowing mammals from using these disturbed areas to minimize or avoid impacts to raptors and other avian predators; see EIS Appendix 4 (Mitigation).
12685-6	Philip Gossi; Gooding-Lincoln County Farm Bureau	New roads - Increased public access will disturb wildlife and normal cattle grazing that currently co-exist. It also increases poaching and livestock theft. The new roads would encourage many outdoors activities that keep wildlife from habituating in this area.	The effects of new roads and increased public access on wildlife are disclosed in EIS Section 3.18 (Wildlife) and Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). The grazing allotments in the siting corridors are already accessible by existing access roads and increased public access following construction would be unlikely to substantially alter existing grazing operations or increase livestock theft. Therefore, further analysis in the EIS is not warranted.
12914-1	David Luper	I would like to address a concern/discrepancy that I found in the Draft Environmental Impact Statement regarding the Burrowing Owl. Information regarding this species is wildly contradictive in the DEIS. They range from “not present” in 2021 (although page 3-82 states that current nests likely went undetected) to populations would be “greatly affected”, and “further study is needed due to this species not being ‘targeted’ in this study”. As stated in the DEIS on pages 3-76 the Burrowing Owl is one of 4 species that was determined to be at risk for a population decrease from this proposed project. Further study is needed on all 4 species. The Western Burrowing Owl, Short-Eared Owl, Ferruginous Hawk, Short-Billed Curlew all need detailed and species specific independent studies before any project is allowed to move forward. On pages 3-80 the DEIS states that “Given that project raptor nest and avian use surveys were not designed to assess burrowing owl use or nesting, the species is likely underrepresented in the survey data, and burrowing owl use and nesting in the siting corridors may be higher than the data would suggest.” The DEIS further states in the same paragraph that, “a very high burrowing owl fatality rates were observed at one existing wind energy facility in California.” In short the EIS states that mortality rates could be extremely high and further study is needed. The current DEIS has little about the Burrowing Owl. What it does state is that we have not attempted an in depth look at the effects this could have on the local population of Burrowing Owls. The DEIS states on page 3-71 that the BCR-9 population of Burrowing Owls is estimated to be 60,000 individuals or 6% of the total population. The DEIS also states on 3-71 that in BCR-9 the mortality could be a few or as many as a thousand. This would be a substantial hit to the local population. It further states that “Given that western burrowing owls are known to breed in the siting corridors and likely depend on high reproductive output and adult survivorship to maintain their population in BCR 9, even a relatively small increase in fatalities during the breeding season, or a small reduction in reproductive output, could impact their population in BCR 9.” In summary DEIS states in its own pages that mortality would be high	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), the BLM would require MVE to implement targeted burrowing owl surveys prior to construction because of the lack of targeted surveys for these species during the avian use studies (additional measure q; also see Table App4-4 in EIS Appendix 4 [Mitigation]). EIS Appendix 4 also describes postconstruction monitoring that would be implemented to assess avian fatality rates, adaptive management measures that would be implemented to address high avian fatality rates, and additional monitoring to assess the effectiveness of adaptive management measures.

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		and the population would suffer significantly. The DEIS in its entirety has not addressed scientifically how this would affect the Burrowing Owl. There is speculation at best written on its pages. All data about the owl is inconclusive and borrowed from other studies where the Burrowing Owl was simply observed while studying other species. State and Federal authorities have listed the Western Burrowing Owl as a Tier 2, species of great conservation need.	
12982-8	Jerry Taylor	The DEIS gives little attention to potentially significant impacts from blasting, on the unique geology underlying the project area, the hydrological impacts that may occur, the loss of habitat(s), or the potential damage to irrigation structures and/or private wells. Instead, it relies on future mitigation and future plan development (i.e. a "Blasting Plan"), which would enlist the services of a "Blasting Engineer" to craft specific plans, after the final EIS record of decision is issued, on where and how to blast. Why wait? ... What would be the potential direct impacts of blasting and the frequency of blasting (twice per day on average, for the two year construction period) on wildlife species (avian and terrestrial)?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). A full blasting plan cannot be developed until turbine/infrastructure micro-siting is complete and geotechnical investigations have been conducted to determine where blasting will be necessary. The environmental protection measures in Section I-6 of the Blasting Plan Methodology (Appendix I in MVE [2023]) and EIS Appendix 4 (Mitigation) would constrain when and where blasting would occur. Further, as described in the Blasting Plan Methodology, the blasting contractor must comply with all applicable federal, state, and local laws and regulations that pertain to explosives, and the blasting plan must be approved by the appropriate state or federal agencies and the BLM prior to the BLM issuing notice to proceed. Potential impacts to wildlife from blasting are disclosed in EIS Section 3.18 (Wildlife); impacts to avian species from blasting are disclosed in AIB-2 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief).
12985-4	Jerry Heimerdinger	Approval of an energy project of this magnitude would have a severe net negative impact upon this almost virgin sagebrush steppe ecosystem that must be the priority of this Environmental Impact Statement. Upon reviewing the Lava Ridge Wind Project map, I noticed the projected acreage of BLM land is almost totally confined by agricultural land. This small, fragile ecosystem would be highly fragmented. (Habitat fragmentation) The natural migration route of the BLM land between the ag. land of Dietrich and that of Hidden Valley would be severely interrupted. (Also, west between Dietrich and Jerome ag. Land) In effect, the natural state of this land would be critically compromised if the Lava Ridge Wind Project were approved. Providing habitat for wildlife, open spaces where people find fun, recreation, and renewal, conserving America's western heritage, and food for livestock, is difficult enough. These uses should be a priority over constructing a huge wind turbine farm to harvest the natural resource of wind.	See EIS Section 3.18 (Wildlife) for a discussion of impacts related to habitat fragmentation and migration routes; this section includes a description of the measures that would be implemented to minimize or avoid these effects (see EIS Appendix 4 [Mitigation] for additional details).
12988-7	Melody Asher	Western Burrowing Owl Your DEIS says "Alternative B could result in more western burrowing owl fatalities than the other action alternatives because it would have the most bird fatalities overall. Although burrowing owl fatalities are relatively uncommon at most existing U.S. wind energy facilities, very high burrowing owl fatality rates were observed at one existing wind energy facility in California where a large population of breeding owls was present. Given that project raptor nest and avian use surveys were not designed to assess burrowing owl use or nesting, the species is likely underrepresented in the survey data, and burrowing owl use and nesting in the siting corridors may be higher than the data would suggest; thus, more fatalities may occur than expected. Given this, the possibility that fatalities resulting from collision with operational turbines could adversely affect the western burrowing owl population in BCR 9 cannot be ruled out. This would especially apply when the impact of numerous facilities across the landscape is considered (see Section 3.3.2.2.6 [Cumulative Impacts]" BUOW is a migratory owl species that is a threatened species in Mexico, an endangered species in Canada and is on the U.S. Fish and Wildlife Service's list of species of conservation concern. I did not see any Burrowing Owls (BUOW) the other day in the Lava Ridge area but that doesn't mean they are not out there ... ! have noticed that we do not have as many BUOW as we used to - they are not in areas that they used to be seen in every year so I am worried about their population and don't think we need to lose anymore. I think the BUOW needs studied in the area before making a decision to put in the wind turbine farm.	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B), the BLM would require MVE to implement targeted burrowing owl surveys prior to construction because of the lack of targeted surveys for these species during the avian use studies (additional measure q; also see Table App4-4 in EIS Appendix 4). EIS Appendix 4 (Mitigation) also describes postconstruction monitoring that would be implemented to assess avian fatality rates, adaptive management measures that would be implemented to address high avian fatality rates, and additional monitoring to assess the effectiveness of adaptive management measures.
13000-11	Nathan Small	ribes' Fish and Wildlife Department Mission Statement Consistent with the Tribes' Snake River policy, the Tribes' Fish and Wildlife Department developed the following mission statement to provide additional guidance to program managers and Department personnel. The mission of the Shoshone-Bannock Tribes Fish & Wildlife Department is to protect, restore, and enhance, fish and wildlife related resources in accordance with the Tribes' unique interests and vested rights in such resources and their habitats, including the inherent, aboriginal and treaty protected rights of Tribes members to fair process and the priority rights to harvest pursuant to the Fort Bridger Treaty of July 3, 1868 (15 Stat.673). The Department is guided by a collective Tribal vision for responsible management, creating and implementing programs for fish, wildlife and their habitats. Through holistic action implementation the Department engages each year in habitat restoration, vegetation management, technical consultation, production measures, research, monitoring and evaluation efforts for a variety of species. Using the best available science, traditional ecological knowledge, and integrated and innovative project planning the Department is able to deliver a wide-array of technical expertise for fish, wildlife, and plants. Our initial assessment of the project proposal does indicate a potential for irretrievable landscape level disturbances for a number of culturally important species and their habitat (bats, sage grouse, raptors, and big game animals). From the perspective of fish and wildlife species, the conversion of this landscape to an industrial power facility would irreversibly alter the species composition in the area.	Each resource section in EIS Chapter 3 (Affected Environment and Impacts) discloses the irreversible and irretrievable impacts that would occur. As described in these sections, there would be irreversible impacts to individual wildlife during the 84-year analysis period, but most impacts would not be irreversible because most habitat would be restored in the long term, and because impacts would not result in a loss of population viability or trend toward federal listing for any species.
13006-10	Leon Smith	Wildlife/Avian 1) Recommend BLM include more detailed analysis of population level impacts and population connectivity, not just habitat connectivity.	The discussion of impacts to avian species and other wildlife in the EIS focuses on impacts to populations, and the geographic extent of populations was considered when developing the analysis area for each section; see EIS Sections 3.3 (Avian and Bat Species), 3.11 (Pollinators and Insects), and 3.18 (Wildlife). For most terrestrial wildlife, habitat connectivity is directly correlated with population connectivity. Impacts to general wildlife movement are disclosed in EIS Section 3.18.1.2 (Wildlife Movement, Impacts), which concluded that habitat loss and fragmentation from permanent project infrastructure and temporary work area disturbance would limit

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			wildlife movement and isolate populations. To comply with 40 CFR 1502.2, additional species-specific discussion is only provided for those species that have the greatest potential to be significantly impacted by habitat loss and fragmentation; see EIS Sections 3.11.2 (St. Anthony Sand Dune Tiger Beetle), 3.18.2 (Big Game Habitats and Populations), 3.18.3 (Amphibians), and 3.18.4 (Pygmy Rabbit). Most volant (flying) species (i.e., birds and bats) are highly mobile and have well-mixed populations that are unlikely to experience reduced connectivity; as with terrestrial wildlife, species-specific analysis is only provided for those species that have the greatest potential to be significant impacted by habitat loss and fragmentation; see EIS Section 3.3.4 (Greater Sage-Grouse). Additional discussion of impacts to avian and bat habitat and migratory behavior is provided in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1, AIB-5, and AIB-8.
13006-13	Leon Smith	4) Recommend the DEIS includes a clearer description of duration/type of temporary fencing at different phases of the project and an analysis of temporary fence impacts to wildlife. Ensure commitment that new fencing associated with the project is truly temporary if an action alternative is selected.	Additional details on temporary fencing can be found in EIS Appendix 11 (Project Elements Common to All Action Alternatives) and the Grazing Coordination Plan (Appendix S in MVE [2023]). Impacts to wildlife from temporary fencing are described in Section 3.18 (Wildlife).
1689-4	Tammy Larson	As a citizen that lives near the proposed site I often see wild life. This includes Bald Eagles, elk, mule deer, coyotes, antelope, sage grouse, kangaroo rats, rabbits, wolves, mountain lions, bats, hawks, and so many more. These wind turbines pose a threat to their habitats, hunting grounds, and their feeding areas. Those that manage to survive this major disruption will be forced onto lands of farmers and into cities. Having them on farms will destroy farmers crops. The BLM land rightfully is land for the animals.	Impacts to birds and bats are disclosed in EIS Section 3.3 (Avian and Bat Species), impacts to pollinators and insects are disclosed in EIS Section 3.11 (Pollinators and Insects), and impacts to other terrestrial wildlife are disclosed in EIS Section 3.18 (Wildlife). Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017) but in none of these cases has damage to crops from displaced wildlife been raised as a substantial concern. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that displaced wildlife would have negative economic consequences for the local agricultural economy. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
2656-1	Judy Siak	I can not in all good conscience say yes to this as you're killing eagles and other birds . You need to find a way to let the birds know that they are there. By either reflectors or something.	See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures that would be implemented to minimize or avoid impacts to eagles and other avian species.
3062-3	Kate Lopez	Construction decibel levels are expected to be 87-92. That is almost 6 times the current levels. And how do animals complain? They just die. Adequate analysis of animal population disturbance has not been done.	Impacts to wildlife from noise and human disturbance are disclosed in EIS Section 3.18 (Wildlife) and Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief).
3073-1	Becky Ipsen	These are bigger windmills than we currently have in this state. No long term studies have been done to realize the affects of these on our wildlife. Windmills are known to kill many birds of prey.	EIS Section 3.3.2 (Avian Populations) describes the relationship between turbine size and avian fatality rates.
3078-1	Curtis & Marsha Jones	There are a variety of over 40 plants and animals that are on the Idaho Endangered Species and Threatened Lists along with many that were previously endangered and could be again threatened. How will these plants and animals be protected from the Lava Ridge projects. What studies have been completed as to the nature of these plants and animals, needs, patterns, habitats and the impacts of what is being proposed? In addition, what about the project's health and personal impacts to humans? Endangered Species - Threatened: -Burrowing Owl -Limpet -Springsnail -Kootenai River White Sturgeon -Sandhill and Whooping Cranes -Snake River Physa Snail -Snake River Sockeye Salmon -Water Fowl -Woodland Caribou	Species listed as threated or endangered under the ESA are designated at the federal level, the state of Idaho does not designate threatened or endangered species; however, IDFG has identified SGCNs for Idaho. The IPaC report for the project (USFWS n.d. [2023]) indicates that no threatened or endangered species or critical habitats occur in the siting corridors and surrounding vicinity; however, the BLM is currently consulting with the USFWS on potential impacts to the threatened yellow-billed cuckoo, as described in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Impacts to western burrowing owl are disclosed in EIS Section 3.3.2 (Avian Populations). U.S. Fish and Wildlife Service. n.d. [2023]. Information for Planning and Consultation (IPac). To be provided by the Bureau of Land Management.
3163-1	Rick Aitchison	Lets do a study for a period of time not less than 36 Months, (1st) To determine Environmental Impact to include endangered species.	MVE conducted baseline resource inventories for vegetation and wildlife over a 2-year period, the results of which are summarized in the relevant Affected Environment sections in EIS Chapter 3 (Affected Environment and Impacts), along with additional data obtained through the BLM's background literature review and coordination with state and federal agencies. See EIS Appendix 3 (Issues Analyzed in Brief) for a discussion of potential impacts to ESA-listed species. Impacts to monarch butterfly, a candidate for ESA listing, are disclosed in EIS Section 3.11.3 (Monarch Butterfly).

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3256-4	Regina Smith	Hunters and other outdoor recreationists have already predicted wildlife will move out of the area. Under future trends where are the wildlife going to go.	See EIS Section 3.18 (Wildlife) for a description of effects to wildlife from disturbance and displacement.
3340-1	Sue Page	The LRWP will adversely affect the wildlife that makes the Lava Ridge area its home. The deer, pronghorn, elk, Pygmy rabbit, to name a few. The construction of 486 miles of new roads throughout the area will greatly fragment the natural habitat and displace the wildlife, as well as decrease the vegetation these animals rely upon to survive. Construction of this project will require 525 days of blasting with 126,000 pounds of the high explosive, ANFO. Unlike the low explosives, black powder and smokeless powder, which function by “pushing” objects out of place, a high explosive acts by shattering and destroying, unleashing tremendous noise and shock waves. Will this violence cause the wildlife to flee, never to return?	Impacts to wildlife from habitat loss and fragmentation, roads and infrastructure, and noise and blasting are disclosed in EIS Section 3.18 (Wildlife); see also AIB-2 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). EIS Section 3.18 also describes the mitigation measures that would be implemented to minimize or avoid these effects; see also EIS Appendix 4 (Mitigation).
3997-4	Angelee Eames	How does MVE "mitigate" the killing of wildlife as we now know it to exist?	See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures.
41-1	Carson Simper, Clement Simper, Rhoda Simper, Lexi Simper	Wildlife animals that live out there and winter there that will move to a new range or decrease in population. The EIS glosses over these numbers.	The potential for significant impacts to wildlife are disclosed in EIS Chapter 3 (Affected Environment and Impacts). This chapter also describes the mitigation measures that would be implemented to minimize or avoid impacts to wildlife (see also EIS Appendix 4 [Mitigation]).
4183-1	Susan Kohn	I would ask first what do you plan on doing with the animals who live on that land ? Kind regards, Susan Kohn sue_kohn6@hotmail.com	See EIS Appendix 4 (Mitigation) for a complete list of mitigation measures.
4331-1	Marsha Jones	Please stop Lava Ridge. There are a variety of both plants and animals that are on the Idaho Endangered Species and Threatened Lists along with many that were previously endangered and could be again threatened. How will these plants and animals be protected from the Lava Ridge projects? What studies have been completed as to the nature of these plants and animals, needs, patterns, habitats and the impacts of what is being proposed? In addition, what about the project’s health and personal impacts to humans? Endangered: Burrowing Owl Limpet Springsnail Kootenai River White Sturgeon Sandhill and Whooping Cranes Snake River Physa Snail Snake River Sockeye Salmon Water Fowl Woodland Caribou Threatened List Bliss Rapids Snail Bull Trout Canada Lynx Grizzly bear MacFarlane’s Four-o’Clock (plant) Northern Idaho ground squirrel Slickspot Peppergrass (plant) Spalding’s Catchfly (plant) Steelhead Trout Chinook Salmon Ute Ladies’-Tresses (plant) Whitebark pine (plant) Yellow-billed Cuckoo Proposed Threatened/Candidate Little Brown Bat Monarch Butterfly Northern Bog Lemming Suckley’s Cuckoo Bumble Bee Western Bumble Bee Western Ridged Mussel Previously Endangered / Previous Candidate (could be endangered again by these projects) Bald Eagle Christs Paintbrush (plant) Columbia Spotted Frog Goose Creek Milkvetch (plant) Gray Wolf Greater Sage-Grouse Idaho Springsnail North American Wolverine Packard’s Milkvetch (plant) Peregrine Falcon Southern Idaho Ground Squirrel Utah Valvata Snail Water Howellia (plant)	Species listed as threated or endangered under the ESA are designated at the federal level, the state of Idaho does not designate threatened or endangered species; however, IDFG has identified SGCNs for Idaho. The IPaC report for the project (USFWS n.d. [2023]) indicates that no threatened or endangered species or critical habitats occur in the siting corridors and surrounding vicinity; however, the BLM is currently consulting with USFWS on potential impacts to the threatened yellow-billed cuckoo, as described in Table App3-3 in EIS Appendix 3 (Issues Analyzed in Brief). Tables App3-4 and App3-5 were added to EIS Appendix 3 in the final EIS to disclose BLM’s rationale for excluding other special-status species with the potential to occur in the siting corridors from detailed analysis in the EIS. Impacts to western burrowing owl are disclosed in EIS Section 3.3.2 (Avian Populations), impacts to bald eagle are disclosed in EIS Section 3.3.3 (Eagles), impacts to greater sage-grouse are disclosed in EIS Section 3.3.4 (Greater Sage-Grouse), impacts to little brown bat are disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat), impacts to monarch butterfly are disclosed in EIS Section 3.11.3 (Monarch Butterfly), impacts to Suckley’s cuckoo bumble bee and western bumble bee are disclosed in EIS Section 3.11.4 (Bureau of Land Management Special-Status Bumble Bees).
4751-1	Joan Hurlock	On page 3-12 of the EIS report there is an obscure reference to the blasting that will take place during the construction phase of the project. From the report one learns that “Blasting emissions were estimated assuming two blasts per day for 525 days assuming 120 pounds of ammonium nitrate-fuel oil per blast using AP-42 Explosive Detonation factors”. Over 525 days, 126,000 pounds of ammonium nitrate-fuel oil (ANFO) explosive will be used throughout the project site. This is very concerning. Ammonium nitrate-fuel oil (ANFO) explosive is classified as a high explosive. This is based on the velocity at which an explosive detonates. The use of a low explosive will produce a “pushing” effect, whereas a high explosive is designed to “shatter and destroy”. There are several concerns that need to be addressed regarding this amount and type of blasting that will take place. The first concern is the impact the amount of daily blasting, for 525 days, will have on wildlife. On page 3-479 of the EIS, it is pointed out that noise can alter behavioral patterns in animals. It has been shown that noise from aircraft “increases animal vigilance, induces a flight response and habitat displacement, which may result in reduced fitness of the animals”. This was observed to occur with disturbance from aircraft. How much more so will wildlife be impacted by the noise produced by daily blasting? Will the animal displacement be temporary or permanent? Will wildlife return after 525 days of sustained blasting? The areas that wildlife will be displaced from provide important winter habitat. Will winter mortality increase if wildlife avoids their wintering ground? The report also states that the blasting noise will meet “quiet” standards at 3.1 miles from the blasting site. Based on personal experience, I contend that the blast noise will not meet “quiet” standards at that distance, and that the effects from the blast pressure waves can be felt from at least seven miles away. It is my opinion that it may be several years before wildlife returns to the area of impact.	As stated in EIS Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B), “While individual blasts may disturb or displace wildlife, they would be unlikely to lead to long-term effects on wildlife movement because blasting would not occur repeatedly in the same area over a long period of time.” Mitigation measures would be implemented to minimize the effects to special-status wildlife from blasting; see EIS Appendix 4 (Mitigation).
5331-2	Joan Hurlock	The LRWP will adversely affect the wildlife that makes the Lava Ridge area its home. The deer, pronghorn, elk, Pygmy rabbit, to name a few. The construction of 486 miles of new roads throughout the area will greatly fragment the natural habitat and displace the wildlife, as well as decrease the vegetation these animals rely upon to survive. Construction of this project will require 525 days of blasting with 126,000 pounds of the high explosive, ANFO. Unlike the low explosives, black powder and smokeless powder, which function by “pushing” objects out of place, a high explosive acts by shattering and destroying, unleashing tremendous noise and shock waves. Will this violence cause the wildlife to flee, never to return?	As stated in EIS Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B), “While individual blasts may disturb or displace wildlife, they would be unlikely to lead to long-term effects on wildlife movement because blasting would not occur repeatedly in the same area over a long period of time.”
5791-1	Paul Kaiser, Jana Kaiser	Good day, I am writing today to ask that you deny LS energy based on our concerns for the wildlife. This was addressed in the EIS on page 29.It states the wildlife movement even with minimization measures would substantially fragment remaining wildlife habitat connectivity and could greatly impair the ability of wildlife to move through the analysis area. Information found in sections 3.18 1.1.1 which states “ These projects would add more roads, fences, transmission lines and human activity to the analysis area all of which could be barriers	Impacts to sensitive wildlife, including big game, were given careful consideration during project siting and the development of the range alternatives analyzed in the EIS. While there are sensitive habitats and species within the siting corridors and immediate vicinity, critical habitat for ESA listed species has not been proposed or designated in the siting corridors and immediate vicinity, and there are no state or federal special land use designations present (such as ACECs, National Wildlife Refuges, state Wildlife Management Areas, etc.) In

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		to wildlife movement." The EIS on page 29 states that mule deer and pronghorn will have the greatest loss and disturbance and displacement from noise and human activity resulting in the greatest injury and direct mortality from collision with vehicles. We would sum it up this way, we already have wildlife pushed to areas that pose harm to themselves and humans. Areas in Idaho already have mountain lions that roam around town endangering children, pets, and adults. The county roads and highways surrounding the BLM land have incurred many collisions of big game with vehicles, this is never a good outcome for either species. Why would we push it to the limits and increase the endangerment of big game and the residents of Idaho? We attended a BLM presentation on Feb 23 in Twin Falls, the map of Idaho was shown, with layer after layer added to indicate the protected lands, such as forest, include, big game migration routes etc. By the time it was complete all of Idaho was under some level of protection. Why are you now willing to make concessions on these protections? I am asking that you deny the Lava Ridge wind turbines and leave the wildlife a place to call home. We choose option A.	addition to MVE's applicant-committed measures, the BLM has developed a number of other mitigation measures to minimize or avoid impacts to wildlife (including greater sage-grouse and big game) that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]).
6075-4	Lorinda Grant, Douglas Grant	The turbines will be visible for miles which will destroy the rural nature of the area. And destroy the natural habitat of the desert ground the turbines will be on. The migration of the deer, elk and antelope will be severely impacted. We have wildlife migrating across our property and see the patterns on an annual basis. There are many types of birds that will be severely impacted by the windmills. There are eagles, hawks, owls, sage grouse and waterfowl the travel through the impacted area. Their populations will be significantly reduced. We rely on bees, and the other insects that help pollinate our crops the turbines would destroy the population of these insects thereby causing financial difficulties to the farmers in the area.	The potential for significant impacts to wildlife (including big game, avian species, and pollinators and other insects) are disclosed in EIS Chapter 3 (Affected Environment and Impacts). This chapter also describes the mitigation measures that would be implemented to minimize or avoid impacts to wildlife (see also EIS Appendix 4 [Mitigation]). Impacts to pollinators are discussed in EIS Section 3.11.1.2, which specifically discloses the potential for reductions in pollinator populations to diminish the ecosystem services they provide, including pollination of agricultural crops. Additional discussion is provided in Section 3.11.3.2 (Monarch Butterfly, Impacts) and Section 3.11.4.2 (Bureau of Land Management Special-Status Bumble Bees, Impacts). All action alternatives would impact pollinators to some degree; however, studies quantifying the magnitude of this impact are lacking (Arcadis Belgium 2020). Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017) but studies linking a reduction in crop productivity or yields due to pollinator declines from wind turbine mortality are lacking. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that direct mortality of pollinators and other insects from collisions with operational wind turbines would have negative economic consequences for the local agricultural economy. Arcadis Belgium. 2020. *Business and nature working together: action by the energy sector to protect wild pollinators*. Technical guidance prepared by Arcadis Belgium for the European Commission under contract No. 07.0202/2018/795538/SER/ENV.D.2 Technical support related to the implementation of the EU Pollinators Initiative. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
6511-3	Kelly Varelmann	The wildlife will undoubtedly flee….will they return? Will their natural habitats even be available if they do return?	As stated in EIS Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B), "While individual blasts may disturb or displace wildlife, they would be unlikely to lead to long-term effects on wildlife movement because blasting would not occur repeatedly in the same area over a long period of time."
6858-1	Adam McWade	My concern is the understated impacts across greater sage grouse and wintering big game habitat. As a state and in general western states are allocating resources to support dwindling sage grouse populations. Yet we want to implement a project that won't just cause the disturbance states in the analysis. That is once everything has been built in place, during construction the travel and road building and other activities will be continuous for years impacting habitat usage across species. It seems a counter intuitive to say we want to save this species while also endangering key areas and habitat that is already fractured and shrinking. Secondly as we have experienced later winters and habitat increase disturbance and habitat fracturing could be more detrimental to populations. Have we seen studies from other areas including Wyoming where such projects have been proposed? Have any real impact studies been done or are these estimates based on assumptions and best case scenarios?	We are not aware of studies evaluating the influence of late winters and habitat fragmentation or reduction of habitat on sage-grouse, though there are studies predicting effects from climate change and increased disturbance (e.g., see Heinrichs et al. [2019]). EIS Section 3.3.4.2.2 (Alternative B), describes impacts to habitat, habitat fragmentation and connectivity among leks within the affected population. The BLM (2015) defines three categories of habitat based on quality: Priority HMAs where restrictions on development are highest, Important HMAs, and General HMAs considered lower quality habitat with poor connectivity and fewer males. The project is proposed in General HMA, although only a portion of the project is in sage-grouse habitat. As described in EIS Appendix 4, Mitigation, there are numerous restrictions on development within buffers around leks and mitigation measures that would be required to protect sage-grouse and their habitat as much as possible. The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing; see Section 3.18.2.2.2 (Big Game Habitats and Populations, Impacts). The BLM worked closely with IDFG to compile and analyze the best available information to disclose impacts to big game winter habitat and population-level effects as accurately as is possible.

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			Heinrichs, J., M.S. O'Donnel, C.L. Aldridge, S.L. Garman, and C.G. Homer. 2019: Influences of potential oil and gas development and future climate on sage-grouse declines and redistribution. *Ecological Applications* 29(6):e01912. Available at: https://pubmed.ncbi.nlm.nih.gov/31310420/. Accessed December 29, 2023.
6869-1	Kade Pincock	That land is crucial wildlife habitat that will be totally destroyed by the infrastructure that is going to be built. I read something that said this won't affect Idahos wildlife but I just can't believe that especially when that desert is very much alive with deer and elk at this time of year when they are pushed down out of their summer ranges	See EIS Section 3.18 (Wildlife) for a description of impacts to wildlife, including big game.
6885-3	Louis Zamora; Twin Falls Canal Company	Again whether it be a bird or mammal all these animals travel to different areas of Southern Idaho and the EIS should have covered the whole Magic Valley Region to see what the true impact really is. Please keep the Magic Valley Magic and pic Option A of no-build. More studies need to be done to see how it would impact our and the animal's lifestyles.	The analysis areas for biological resources are described in the introduction to each resource section in the EIS, for most wildlife species the analysis area extends well beyond the siting corridors.
6903-1	Todd Wells	Because research and studies conducted in other areas is not directly correlated to this site, I believe that specific, detailed evaluations of these specific resources and unique populations should be required prior to any development of the proposed area. Wildlife resources--As home to a wide variety of wildlife including deer, antelope, multiple raptor species, bats, sage grouse, monarch butterflies, and a multitude of other desert dwelling animals, the impact of wind turbines is largely unknown. Several studies in other regions have indicated that the effects can be very detrimental to some of these species. The impact of a multi-year development of the site and construction of the turbines will have a negative impact on all of these animals, from which we don't know how they will recover. Additionally, once construction is finished the turbines can continue to have a negative impact on the population of many of the avian species.	Wildlife (including big game) are discussed in EIS Section 3.18 (Wildlife), avian and bat species (including greater sage-grouse) are discussed in EIS Section 3.1 (Avian and Bat Species), and monarch butterflies are discussed in EIS Section 3.11.3 (Monarch Butterfly); see also EIS Appendix 3 (Issues Analyzed in Brief).
6903-8	Todd Wells	Chemical application to control invasive and noxious weed population has questionable success in rangeland situations; chemical residues may also serve as a immediate and long-term risk to terrestrial wildlife and avian species. We can't risk these unknown impacts; they will affect the environment directly and indirectly to an extent that won't be known for many years.	As described in EIS Section 3.15 (Vegetation), much of the siting corridors are already dominated by nonnative species such as cheatgrass and crested wheatgrass due to past disturbances and reseeding efforts. While the siting corridors are situated within active rangelands, project herbicide applications are not intended to restore rangeland or eliminate existing infestations of noxious weeds and other nonnative plant species. As described in the Noxious Weed Management Plan (Appendix R in MVE [2023]), the primary objectives of the plan are to prevent the introduction of new noxious weed populations and to eliminate or contain the spread of existing noxious weed populations on site throughout the life of the project. The Noxious Weed Management Plan also describes preventative measures that would be implemented to minimize or avoid new noxious weed infestations and the spread of existing infestations; see also EIS Appendix 4 (Mitigation). These measures would reduce the need for herbicide applications within MVE's ROW (if one is granted). Impacts to wildlife from herbicide use are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-58. As described in this table, this issue was not analyzed in detail in the EIS because these effects have been previously analyzed by the BLM (2007, 2016) and because impacts would be minimal with the implementation of applicant-committed and BLM-required mitigation measures.
6909-1	Tim Waters	In the study I did not see mentioned about stripped chipmunks snow shoe rabbits and bald eagles all of which I have seen while moving cows in the desert.	General wildlife (including small mammals) are discussed in EIS Section 3.18.1 (Wildlife Movement [non-game mammals and reptiles]), eagles (including bald eagles) are discussed in EIS Section 3.3.3 (Eagles); see also EIS Appendix 3 (Issues Analyzed in Brief).
7320-4	Lora Ohlensehlen	Lastly I am concerned about the wildlife in the proposed area of building. Wildlife has not been documented as strongly as it has been in the past. The current EIS seemed to gloss over the environmental impact of the long term building of this project. It is also concerning that the consequences of the wind mills on the bird, bat, and insect populations have been marginalized.	The impacts to wildlife from the construction, operation, and decommissioning of a wind energy facility vary greatly between species and depend on a number of species- and site-specific variables. To comply with 40 CFR 1502.2(b) the EIS focuses on resource and species impacts that are significant while providing only brief discussion of other issues. EIS Chapter 3 (Affected Environment and Impacts) discloses impacts to wildlife that could be significant, while EIS Appendix 3 (Issues Analyzed in Brief) discloses impacts to wildlife that are unlikely to be significant. Potential impacts to wildlife were carefully considered during project siting and the development of the range alternatives analyzed in the EIS. In addition to MVE's applicant-committed measures, the BLM has developed a number of other mitigation measures to minimize or avoid impacts to wildlife (including sensitive birds, bats, and insects) that would be included in the terms and conditions of the ROW grant, if one is issued (see EIS Appendix 4 [Mitigation]).
8657-1	Richard Dinges	I have not found any consideration regarding the impact of low-level Electromagnetic Field (EMF) effects in the draft Environmental Impact Statement (EIS) for the proposed Lava Ridge wind project on the wildlife and plants within this project. It cannot be denied that an EMF field will be generated along the buried and overhead power lines. This field can easily be quantified. The strength of this field is directly proportional to the current and inversely proportional to the distance from the conductor. A map of this EMF MUST be generated and overlaid on the project area. This will allow the effect of this EMF on the wildlife and plants to be evaluated. Of special concern should be the bats and Monarch butterflies. Bat fatalities from collision with the turbine blades, disorientation from EMF, infrasound, and construction activities could prove to be catastrophic for the bat population. Also not considered is the impact on wildlife from the high frequency cell phone activity that will be present in the project area during construction. The two year construction period will see a high volume of workers coming into their job sites, truck traffic bringing material ,supplies, and turbine components into the project area, and all nature of construction equipment and service trucks traversing the area. Essentially every worker will be carrying a cell phone. Workers will be making personal calls and there will be a significant amount of of contractor work direction. It is probable that some contractors will have their own private communication systems. The cell phone traffic will be both 4 and 5 g. The frequencies of the private contractors communication systems will need to be evaluated. My above comments are based on several recently published papers by B.	Impacts to bats are disclosed in EIS Section 3.3.1 (Bat Populations and Roosting Habitat) and impacts to monarch butterfly are disclosed in EIS Section 3.11.3 (Monarch Butterfly); see also EIS Appendix 3 (Issues Analyzed in Brief). While the publicly available literature indicates that EMF radiation may impact invertebrate activity (Friesen and Havas 2019; Levitt et al. 2022; Wyszkowska et al. 2019), the literature also indicates that the EMF radiation levels at ground-level beneath high-voltage (i.e., 500 kV) transmission lines and above buried medium voltage (i.e., 230 kV) electrical cables is typically far below the threshold required to induce physiological or behavioral changes, but that flying insects within 1 meter (3.3 feet) of high-voltage transmission lines may be affected (Middleton and Barnhart 2023; Wyszkowska et al. 2016). Buried collector lines would be much lower voltage (i.e., 34.5 kV), and the surrounding soil would provide insulation from EMF radiation. Therefore, it is unlikely that EMF radiation from buried collector lines (or new overhead collector and transmission lines) would have a measurable impact on wildlife. Higher frequency EMF radiation from modern 4G and 5G cell phone towers has been shown to effect flying invertebrates (i.e., bees) at greater distances (within 500 meters [1,640 feet]) (Taye et al. 2017), effects from the EMF radiation emitted by cellphones require prolonged, close contact with the device (Panagopoulos et al. 2006). The Levitt et al. (2021a, 2021b, 2021c, 2022) articles referenced in the comment are summaries of existing literature and focus primarily on the effects of cell phone communication networks and the development of new communication technologies, such as 5G

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		Blake Levitt, Henry C. Lai and Albert M. Manville II. They are: (1) “Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach”, (2) “Effects of non-ionizing electromagnetic fields on flora and fauna, part 1. Rising ambient EMF levels in the environment.” (3) “Effects of non-ionizing electromagnetic fields on flora and fauna, part 2 impacts: how species interact with natural and man-made EMF.” (4) “Effects of non-ionizing electromagnetic fields on flora and fauna. Part 3. Exposure standards, public policy, laws, and future direction.” Copies of these papers are attached. One only needs to look to the east coast and the shores of New Jersey to see a potential result of not fully considering all factors relating to siting a wind project. Dead whales and dolphins are washing up on the beaches of New Jersey. It is suspected that activity with efforts to map the ocean floor for wind turbine placement is responsible for this happening. A New Jersey congressman, Jefferson Van Dorn, recently held a congressional hearing on the Jersey shore and has introduced a resolution in the US House to pause activity on this project until further studies can be conducted. I do not believe that a decision on the Lava Ridge EIS can be reached without evaluating the effects of the EMF. THE PLANTS AND WILDLIFE WILL BE AFFECTED BY THE EMF FROM THIS PROJECT. At this time a NO BUILD OPTION SHOULD BE SELECTED.	wireless networks. Effects related to EMF from aboveground transmission lines were primarily limited to species that spend prolonged periods in close proximity to transmission lines, such as birds that nest on transmission structures and bees (which are discussed above). Since none of the alternatives include construction of cell towers or other radio frequency communication systems, there would be no impacts to terrestrial invertebrates from EMF radiation associated with cell phone activity. Aboveground transmission lines would be constructed in accordance with APLIC (2006, 2012) guidelines (see applicant-committed measures 29 and 30 in EIS Appendix 4 [Mitigation]); these include the use of perch and nest deterrents on transmission line structures, which would minimize the potential for effects to avian species from EMF radiation. Given the low potential for impacts to wildlife from EMF radiation generated by transmission lines, a more detailed analysis is not warranted. Friesen, M., and M. Havas. 2019. Effects of non-ionizing electromagnetic pollution on invertebrates, including pollinators such as honey bees: what we know, what we don’t know, and what we need to know. In *Working Landscapes. Proceedings of the 12th Prairie Conservation and Endangered Species Conference, February 2019, Winnipeg, Manitoba*, edited by D. Danyluk, pp. 127–138. Critical Wildlife Habitat Program, Winnipeg, Manitoba. Available at: https://stopsmartmetersbc.com/wp-content/uploads/2021/02/Effects-of-Non-ionizing-Electromagnetic-Pollution-on-Invertebrates-including-Pollinators-such-as-Honey-Bees-What-We-Know-Dont-and-Need-to-by-Margaret-Friesen-and-Magda-Havas-February-09-2021.pdf. Accessed January 5, 2024. Levitt, B.B., H.C. Lai, and A.N. Manville II. 2021a. Effects of non-ionizing electromagnetic fields of flora and fauna, Part 1: Rising ambient EMF levels in the environment. *Review on Environmental Health*. Accessed at: https://www.degruyter.com/document/doi/10.1515/reveh-2021-0026/html. Accessed December 19, 2023. ———. 2021b. Effects of non-ionizing electromagnetic fields of flora and fauna, Part 2: how species interact with natural and man-made EMF. *Review on Environmental Health*. Accessed at: https://www.degruyter.com/document/doi/10.1515/reveh-2021-0050/html. Accessed December 19, 2023. ———. 2021c. Effects of non-ionizing electromagnetic fields of flora and fauna, Part 3: Exposure standards, public policy, laws, and future direction. *Review on Environmental Health*. Accessed at: https://www.degruyter.com/document/doi/10.1515/reveh-2021-0050/html. Accessed December 19, 2023. ———. 2022. Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. *Frontiers in Public Health*. Available at: https://www.frontiersin.org/articles/10.3389/fpubh.2022.1000840/full. Accessed December 19, 2023. Middleton, P., and B. Barnhart. 2023. *Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to Electromagnetic Frequencies from Buried Transmission Cables*. OCS Study BOEM 2023-007. Washington, D.C.: U.S. Department of the Interior, Bureau of Ocean Energy Management. Panagopoulos, D., E.D. Chavdoula, I.P. Nezis, and L.H. Margaritis. 2006. Cell death induced by GSM 900-MHz and DCS 1800-MHz telephony radiation. *Mutation Research/Genetic Toxicocolgy and Environmental Mutagenesis* 626(1–2):69–78. Available at: https://doi.org/10.1016/j.mrgentox.2006.08.008. Accessed January 19, 2024. Taye, R.R., M.K. Deka, A. Rahman, and M. Bathari. 2017. Effect of electromagnetic radiation of cell phone tower of foraging behaviour of Asiatic honey bee, Apis cerana F. (Hymenoptera: Apidae). *Journal of Entomology and Zoology Studies* 5(3):1527–1529. Available at: https://www.entomoljournal.com/archives/2017/vol5issue3/PartU/5-3-142-590.pdf. Accessed December 19, 2023. Wyszkowska, J., S. Shepherd, S. Sharkh, C.W. Jackson, and P.L. Newland. 2016. Exposure to extremely low frequency electromagnetic fields alters the behaviour, physiology, and stress protein levels of desert locusts. *Scientific Reports* 6:36413. Available at: https://doi.org/10.1038/srep36413. Accessed January 19, 2024. Wyszkowska, J., P. Grodzicki, and M Szczygiel. 2019. Electromagnetic fields and colony collapse disorder of the honeybee. *Przeglad Elektrotechniczny* 95(1):137–140. Available at: https://doi.org/10.15199/48.2019.01.35. Accessed January 19, 2024.
8683-5	Wayne Fischer	3.18.1 Wildlife I am very concerned about the wildlife that normally move thru this area and the adverse effects the project will have. The project area has been relatively undisturbed and still wide open where wildlife has moved and graze for thousands of years. The Magic Valley Energy says this area is not in a native state because of fire. I disagree. Fire has been part of this ecosystem since the start of time and always will be because of lightning storms that go through the area. Fires are a natural event and result in the generation of new plant life that feed and shelters all sorts of wildlife. This project will have lasting and catastrophic effects on all wildlife native to the area. The draft EIS as not properly addressed this issue as well.	Native upland vegetation in the siting corridors is described in EIS Section 3.15.1 (Native Upland Vegetation Communities). Impacts to wildlife are disclosed in EIS Section 3.18 (Wildlife); see also EIS Appendix 3 (Issues Analyzed in Brief).
9473-5	Jeffrey Warren	There are a number of animal species in the area that are being protected. How will those protections be maintained?	EIS Appendix 4 (Mitigation) provides a complete list of mitigation measures.
9504-2	Zack Lanier; Idaho Farm Bureau Federation	The first concern I have has to do with the wildlife migration corridors and the disruption this project will have on them. The wildlife already struggle with winter habitat disappearing throughout the whole state. This project will continue to push wildlife out of critical habitat areas. Not only will it force wildlife to leave the area, but this project will force wildlife onto the local farmers operations causing damage to their crops and property. This may also	Impacts to wildlife movement and big game habitat and migration corridors, including displacement and increased predation, are disclosed in EIS Section 3.18 (Wildlife). As described in this section, a number of mitigation measures would be implemented to minimize or avoid these impacts; see EIS Appendix 4 (Mitigation) for a complete list of mitigation measures. Therefore, further analysis in the EIS is not warranted.

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		cause the need for possible increase of depredation of the wildlife. This is negative for the wildlife as well as the farmers in the area.	
9657-2	Saiyare Refaei	I would also like to see the report address any migratory species including the bald eagle, greater sage-grouse, bats, mule deer and pronghorn that may be impacted by the installation of the 400 wind towers. (see ES-xvi & ES-xvii) The cumulative impact of the lifetime of the project is ultimately negatively impacting all of these populations in addition to all of the ground disturbances.	Migratory birds and bats (including bald eagle and greater sage-grouse) are addressed in EIS Section 3.3 (Avian and Bat Species), migratory wildlife (including mule deer and pronghorn) are addressed in EIS Section 3.18 (Wildlife); see also EIS Section 3.11 (Pollinators and Insects) and EIS Appendix 3 (Issues Analyzed in Brief). Each EIS Section includes analysis and disclosure of the impacts of the action alternatives, a discussion of cumulative impacts, and a description of the mitigation measures that would be implemented to minimize or avoid impacts; also see EIS Appendix 4 (Mitigation).
F2-7		BLM needs to adequately analyze the effects this project will have on birds, insects and other animals that migrate through this area and the harms that wind turbines have on them. It is shown through various studies that animals are harmed during the construction of wind farms as well as the use of wind farms. This is a long term change to wildlife and habitat that could greatly harm the wildlife and habitat BLM claims to protect.	Impacts to birds are disclosed in EIS Section 3.3 (Avian and Bat Species), impacts to insects are disclosed in EIS Section 3.11 (Insects and Pollinators), and impacts to other wildlife are disclosed in EIS Section 3.18 (Wildlife); see also EIS Appendix 3 (Issues Analyzed in Brief).
10512-7	S. (No Last Name Provided)	The lands also provide winter range and refuge for migrating populations of mule deer and pronghorn antelope. The big game animals rely on this area to escape deep snow and predators from their former summer range. I have witnessed herds of several hundred antelope from Star Lake to Wilson Butte to Eden every winter. I have archery hunted mule deer many times in the same areas and come November, the resident populations receive an influx of hundreds to thousands of migrant populations seeking grounds to winter on. I am not sure how the EIS could rate this habitat so low when I have witnessed for several years these massive herds that rely on this habitat to survive. It would be a drastic mistake to ruin this habitat with this project for these migrant populations and it would have a devastating effect on them with the loss of habitat and added stress from increased human impacts.	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the current status of populations and distribution and the importance of existing winter range for mule deer and pronghorn, and the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]).
11327-2	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	The DEIS fails to adequately consider impacts to big game and their migrations. The BLM must develop new alternatives that avoid impacts to wildlife and wildlife migrations in the project area. a) Importance of Seasonal Ranges and Migration Routes – Negative Impacts of Wind Development Inadequately Accounted For Big game species such as pronghorn, mule deer, and elk migrate between winter and summer seasonal ranges to increase survival. On landscapes where they occur, migrations are increasingly considered a critical behavior to enhance ungulate foraging opportunities and avoid deep snow.7 Migratory behavior allows animals to access forage at peak phenology8, which often carries nutritional benefits and increases individual fitness that supports population persistence and ecosystem function.9As the human footprint continues to expand, the migratory journeys of ungulates are becoming increasingly difficult, threatening the long-term persistence of existing migrations.10 Long-term studies of mule deer have found population-level effects from natural gas development, despite aggressive onsite mitigation efforts and a 45% reduction in deer harvest.11 Additionally, migrating deer reduce stopover use, increase their travel speed, and sometimes detour around development infrastructure and activity. While research on the effects of wind development on pronghorn is still emerging, evidence to date is very concerning. Taylor et al. (2016) found that proximity to a wind facility did not affect winter survival of pronghorn, but it did change patterns of space use by females.12 This latter piece is important given that populations are driven by females and their ability to reproduce sufficient young at or above replacement levels. Exposure to further disturbance during this already risky timeframe – such as being pushed to use of lower quality habitat - may impact survival and overall health of these populations. Smith et al. (2020) found evidence that pronghorn avoided wind turbines in winters after development within their winter home ranges. This has important implications for wind development projects like Lava Ridge, where development may be occuring in areas known to fulfull important seasonal requirements for pronghorn populations. Thus, special consideration must be given when contemplating further development to landscapes used by pronghorn during winter as they are already predisposed to high mortality rates on winter range due to harsh environmental conditions and high energy demands. Recent scientific publications have also increased our understanding of how wind development impacts migrating pronghorn. Milligan et al. (2023) found that migrating pronghorn avoided turbines when selecting stopover sites in spring and winter, selected areas farther from turbines at a small scale in spring and winter, moved more quickly near turbines in spring (although pronghorn moved more slowly near turbines in the fall), and reduced fidelity to migration routes relative to wind turbines under construction in both spring and fall. The behavioral adjustments pronghorn made relative to wind turbines could reduce the functional benefits of their migration, such as foraging success or the availability of specific routes, over the long term.13 The researchers cautioned that behavioral adjustments pronghorn made relative to wind turbines could reduce the functional benefits of their migration, such as foraging success or the availability of specific routes, over the long term. They also warned that “[a]s development continues to accumulate, behavioral adjustments during migration could lead to population-level consequences, such as fitness impacts from reduced foraging opportunities or the loss of specific migration routes that may only manifest in the long term. Development thresholds that cause the loss of existing migrations remain unknown for ungulates, but our study clarifies that wind- energy development is among the anthropogenic factors that can disrupt migratory behavior across formerly intact landscapes.” While we acknowledge the need for long-term studies for pronghorn (as has been done with mule deer and oil and gas development), the aforementioned research findings strongly suggest that BLM must proceed with a cautious mindset. Unfortunately, we are not convinced this mindset has been adopted in the DEIS, as all of the action alternatives place siting corridors directly over the identified Owinza pronghorn route and in important winter and migratory habitat for mule deer. Animals within the Owinza pronghorn herd migrate upwards of 103 miles seasonally, traversing through lava fields below the Mount Bennett Hills and in the	See response to comment 3150-2 (see in Table A-3aa, Wildlife, including Big Game). With the exception of Milligan et al. (2023), the draft EIS incorporated the cited literature into the big game impact analysis. The final EIS has been revised to incorporate the Milligan et al. (2023) paper, to include the most recent available literature on the topic.

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		Snake River Plains to the western edge of the Wood River Valley, as displayed in Figure 1.14 Individuals in this herd spend 17 days in the spring and 12 days in the fall migrating, on average. [map] Figure 1. Migration routes and stopovers of the Owinza pronghorn herd. [map] Figure 2. Range of Alternatives and the Southern Terminus of the Owinza Pronghorn Route Pronghorn have recently been categorized as a Species of Greatest Conservation Need (SGCN) under Idaho Department of Fish & Game (IDFG) 2022 draft State Wildlife Action Plan (SWAP). In the draft SWAP, pronghorn were highlighted as a high-profile SGCN occurring in Desert & Semidesert habitats that are potentially influenced by energy production and mining.16 IDFG has made it a priority to "Inform regulatory authorities, project proponents, and industry about opportunities to reduce negative effects on SGCN (e.g. facility siting; construction, operations, and maintenance BMPs; and human activity and noise reduction)…and…Implement BMPs that reduce SGCN disturbance in important locations and during important periods (e.g., Pronghorn on winter range…)".17 We appreciate the honesty in the BLM's conclusion when broadly analyzing cumulative effects in the DEIS-for example- "Existing big game habitat may not support the same density of individuals as unaltered landscapes and existing unfragmented or altered habitats are likely important resources for populations in the analysis area…The effect would be greatest for wintering populations of pronghorn and mule deer, as development would be concentrated in the area south of ID24 in an area that provides important winter habitat." (emphasis added) That said, the DEIS lacks specificity when analyzing functional habitat loss for pronghorn and mule deer due to behavioral avoidance and displacement from wind turbines or associated infrastructure. The analysis seems to only reference direct habitat loss from vegetation removal for the installation of wind turbines. The sheer size of the proposed project- up to 312.5 square miles and over 197,474 acres-will result in substantial functional habitat loss due to behavioral avoidance. It is clear there are still too many unknowns about pronghorn and mule deer behavior and tolerance to wind energy development in occupied winter range to even consider a project of this magnitude at this time.	
11327-3	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	b) Temporary Livestock Fencing Alternative B would place upwards of 395 miles of temporary livestock fences along roads to isolate livestock pastures. While the BLM states that fences would be constructed using wildlife-friendly guidelines, the substantial increase in new linear boundaries will likely cause pronghorn to avoid areas or shift behavioral patterns elsewhere. Even wildlife-friendly fencing can cause entanglement and death, sustained injuries, habitat fragmentation, and barriers to movement. Pronghorn have fidelity to the known-crossing sites and specifically travel to these locations when selecting to cross. 18 It is likely that this a learned behavior component to the fidelity of known-crossing sites, with females teaching young the spatial location of sites and how to navigate the bottom wire. 19 Thus, new fencing (even wildlife-friendly fencing) in any season has the potential to negatively impact pronghorn and especially if snow levels exceed 18". Given this, we ask that the BLM provide clarity as to what is meant by 'temporary fencing'. The DEIS states that temporary fencing may be deployed at any given time during the two years of construction and in the two years of decommissioning. We are led to believe that "temporary" means that all fences associated with the project that are deployed during construction would be taken down during project operations, deployed again during decommissioning, and then removed once reclamation is completed. If this is not the case, the BLM should clarify this section, as 395 miles of fencing has substantial impacts to wildlife within the project area. Even the least obtrusive alternative would place up to 222 miles of temporary fencing, meaning all action alternatives' fencing would result in substantial impacts to wildlife species throughout the life of the project. An example is in western Wyoming, where required fencing around an industrial-scale solar farm ultimately blocked access to and reduces connectivity between formerly available habitats for pronghorn. Resident pronghorn lost year-round habitat and had to modify their movements accordingly, and migratory pronghorn could no longer move through the area during migration, affecting migrations that extended up to 225 km away.20 When several hundred pronghorn encountered the fence boundary and moved into the adjacent highway, catastrophic collisions were avoided when Wyoming Game and Fish personnel provided escape routes via opened ROW gates.21	The EIS discloses the range of potential impacts from temporary fencing on big game movement based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The Flagging, Fencing, and Signage Plan (Appendix K in MVE [2023]) includes the following definition of "temporary fencing": Combination of one or more of the following fencing materials will be installed by the construction contractor: rope (1/4-inch diameter in yellow or orange coloring), plastic or fabric tape, and safety fencing. The Grazing Coordination Plan (Appendix S in MVE [2023]) includes a detailed description of temporary livestock fencing and locations during construction, decommissioning, and reclamation. The Grazing Coordination Plan estimates that 20 to 25% of temporary fencing would be deployed at any one time, and no new permanent fencing and no removal of existing fencing is anticipated. The exception to this would be the fencing that would be installed around substations and other facilities, as required by OSHA regulation (29 CFR 1926.966(e)(2)).
11327-4	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	c) Avoidance In its' alternative development, the BLM too quickly jumped to minimizing and mitigating impacts to big game populations rather than proper analysis into avoiding impacts. This runs counter to the BLM's mitigation hierarchy of avoidance, minimization, and mitigation of unavoidable adverse impacts. The BLM concludes that all action alternatives would have irretrievable impacts on wildlife movement from habitat loss and fragmentation caused by ground disturbance for up to 84 years. We look to the BLM to follow mitigation guidance set by Instruction Memorandum (IM) No. 2021-046 Reinstating the Bureau of Land Management (BLM) Manual Section (MS-1794) and Handbook (H-1794-1) on Mitigation. The IM provides policies to: 1) Implement consistent principles and procedures for mitigation in the BLM's authorization of public land uses; 2) Apply mitigation to address reasonably foreseeable impacts to resources (and their values, services, and/or functions) from public land uses; and 3) Follow the mitigation hierarchy by first avoiding damage to the public lands and resources; second, minimizing damage that cannot be avoided; and third, compensating for any residual impacts to important, scarce, or sensitive resources or resources protected by law.(Emphasis added) For pronghorn, the alternatives provide no assurances that avoid their migration route; the alternatives provide no effort to minimize direct disturbance within their migration route; and the DEIS contains weak mitigation language to ensure that unavoidable impacts would be effectively mitigated.	BLM's Mitigation Handbook (H-1794-1) was used to develop the mitigation plan included in the final EIS, which follows the hierarchy of avoidance, minimization, and mitigation. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
11336-3	Nathan Schutte	3. This project is not in character or in harmony with the area. The wind turbines would be an alien element and would completely change the character of the Idaho desert. With it not being in harmony, it would have a major impact on the native wildlife and their natural migration corridors. To get a better understanding, I requested the big game migration corridors from The Idaho Department of Fish and Game and overlaid them on the Lava Ridge Project Area. I have attached Figure 1 that shows the main big game migration corridors that come down	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the location and use of mapped migration and movement corridors, and the range of potential impacts on these migration and movement corridors based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).

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		from the Wood River Valley and then they move through and into what is proposed to be the main part of the Lava Ridge Project. The corridors are illustrated with a bright green color. This shows that the project is in major conflict with the migration corridors. How will this be handled? I also included the readme data request from the Idaho Department of Fish and Game as reference as to where I received the data for the green lines shown in Figure 1.	
11527-4	Richard Stover; State of Idaho	IDFG has initiated radiotelemetry tracking and data collection within the Project area to support big game management programs. IDFG's effort has produced information about seasonal habitat and migration routes for the Owinza pronghorn winter herd (Kauffman et al. 2022a). Analysis of radiotelemetry data for the migratory mule deer herd wintering in the Project area is underway, and products are forthcoming. The importance of conserving or restoring big game migration and seasonal habitat is highlighted in Department of the Interior Secretarial Order 3362, which prioritizes "minimizing development that would fragment winter range and primary migration corridors," and the Idaho Action Plan for Implementing the Department of the Interior Secretarial Order 3362 (IDFG 2022). Protecting and improving movements and migration is also identified as a priority in IDFG's Mule Deer Management Plan (IDFG 2019) and draft Pronghorn Management Plan (IDFG 2023 in review). New research highlights the importance of stopover areas within pronghorn migration routes. The Owinza pronghorn migration, including stopover areas, occurs in the Project area. Stopover areas are patches of higher-quality forage needed to maintain energy reserves during migration. Projects that reduce stopover habitat within migration routes can adversely affect migratory big game, such as pronghorn (see Milligan et al. 2023). Comments on DEIS The DEIS action Alternative B would have the greatest adverse effects on pronghorn and mule deer migration and winter habitat quantity, quality, and connectivity. DEIS action Alternatives C, D, and E (pp. 2-12 – 2-14) would each implement measures intended to reduce adverse Project effects on these migratory big game populations. Removing siting corridors north of State Highway ID-24 may partially reduce fragmentation of big game migration routes and winter range. BLM's Preferred Alternative C (p. 2-13) precludes siting corridors northwest of the Kinport- Midpoint transmission line, which might also reduce adverse effects on migratory big game. Recommendations for the FEIS and ROD Although DEIS text (p.3-469) addresses migratory mule deer, the FEIS needs to include up-to- date information that can be provided by IDFG. Figure 3.18-2 (p. 3-465) presents incomplete information. The "mule deer migration route" layer (green) does not include a migration route for mule deer applicable to the Project area but displays migration routes adjacent to the proposed Project area. IDFG is developing a new migration map with radiotelemetry data for the Owinza mule deer winter herd that includes migration routes within the Project area. This map is expected to be released in April or May of 2023. The FEIS must include updated information for mule deer migration. The FEIS's and ROD's selected Project alternative must maintain connectivity of big game seasonal ranges by avoiding mule deer and pronghorn migration routes. For example, the selected alternative must avoid siting corridors north of State Highway ID-24 (as described in Alternatives C, D, E) and northwest of the Kinport-Midpoint transmission line (as described in Alternatives C and D).	The BLM appreciates the continued coordination and collaboration efforts of IDFG on this EIS. The updated mule deer migration route was not available at the time of publication of the draft EIS; however, it is included for analysis in the final EIS.
11535-80	Steven Andersen	Potential impacts which are not sufficiently analyzed on large ungulates like mule deer and pronghorn antelope include impediments to free movement, creation of migration bottlenecks, and reduction in effective winter range size.	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the location and use of mapped migration and movement corridors, and the range of potential impacts on these migration and movement corridors based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]).
11535-81	Steven Andersen	The DEIS does not include all possible impacts to big game. Its analysis focuses almost exclusively on Mule Deer and Pronghorn. The DEIS concludes that the project would be unlikely to have a measurable effect on elk populations but does not provide an in-depth analysis as to possible effects of the elk population. Impacts to big game such as black bears, wolfs, bighorn sheep, and mountain lions are not analyzed.	The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state that "(a) EISs shall not be encyclopedic" and "(b) EISs shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues." In order to comply with these requirements, the BLM identified issues for detailed analysis in the EIS through the internal and public scoping processes. No specific concerns with elk or mountain lions were raised during this time. Bighorn sheep and wolves are not known to occur within the project area; therefore, these species were not included for analysis.
11535-82	Steven Andersen	Experts have noted how fragile elk are to human interference. On winter ranges, elk are highly susceptible to disturbance. They are so sensitive to human disturbance that even cross-country skiers can cause significant stress to wintering animals.255 Ferguson and Keith (1982) found that while cross-country skiers did not influence overall elk distribution on the landscape, elk avoided heavily-used ski trails.256 Disturbance during this time of year can be particularly costly, since the metabolic costs of locomotion are up to five times as great when snows are deep. To the degree that wind power facilities involve human presence in crucial ranges during the most sensitive time periods, these developments may tend to displace elk from their preferred habitats into marginal ranges, where habitat conditions may be poor or where they may be forced to compete with resident animals already at or near their carrying capacity.	Elk are discussed in EIS Appendix 3, Wildlife AIB-62, which describes that elk herds in southern Idaho are generally robust, and populations are limited more by depredation control than by habitat suitability. The EIS determined that the project would not have a measurable effect on local elk populations.
11535-83	Steven Andersen	The DEIS wrongfully presumes that this project will not have a long-term effect on big game. It states that "[o]ver time, big game use of the siting corridors may improve as work areas are restored and big game individuals become acclimated to the infrastructure areas."258 However, it provides no support for this conclusion. For mule deer, Sawyer et al. (2005) found that in the Pinedale area, wellfield development caused abandonment of mule deer crucial winter ranges for years at a time, and ultimately resulted in a 46% decline in mule deer populations, while herds in undeveloped areas showed a much smaller decline over the same period; the affected population has yet to recover to pre-disturbance levels.259 Indeed, experts have noted that long-term effects should be expected if the construction phase of the project extends over a period of years.	The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The summary statement in the Habitat Loss and Alteration discussion states, "There is little available information regarding the effects of wind development on pronghorn and mule deer; however, both species generally demonstrate avoidance of areas of development, and habituation to presence of human disturbance is not apparent. Therefore, it can be assumed that avoidance of development related to noise and human activity that are audible or visible beyond the project ground disturbance footprint would contribute to long-term habitat losses for both species beyond the project ground disturbance footprint." The full section summary discloses the likelihood of population-level effects for mule deer and pronghorn.

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11535-84	Steven Andersen	The DEIS also fails to look at the effect of big game in the aggregate. Deficiency in any one species can have profound impacts on the ecosystem as a whole. This deficiency is significant because many non-volant animals are protected as sensitive or culturally important species (e.g., game animals) that are already at risk from other forms of human development. Still others are important for their ecological roles and intrinsic value. 261 Ecological impacts may also include so-called cascading effects, because the species within the same ecosystem has ecological relations to one another. This means that an effect on one species may in turn affect many other species, thus creating a cascade effect. Cascade effects may result in different types of interactions, such as competition, predation, parasitism or symbiosis, depending on their effect or mechanism.262 Moreover, changes in spatial distribution of individual species due to human activity can cause similar cascade effects as predation risk. For example, large predators such as wolves and brown bears often avoid areas of high human activity, which can create a predation free area to which prey species may be attracted.263 This spatial redistribution of large herbivores may in turn impact local vegetation structure and lead to less available forage in the areas that are actually used.	See response to comment 11554-15 (see in Table A-3aa, Wildlife, including Big Game).
11535-85	Steven Andersen	The DEIS underestimates the impact of roads on big game. Access to wind turbines for maintenance and other operational purposes requires roads that have well-documented negative effects on wildlife as reviewed by Lovich and Ennen for solar energy developments. Effects include direct mortality and habitat fragmentation, which can extend far beyond the physical surface of the road, and noise. However, with this increase of prey abundance, larger predatory wildlife could be more susceptible to vehicle strikes. The DEIS asserts that fragmentation through new roads could have positive effects that offset any negative ones. However, in a review of the effects of roads on wildlife, Fahrig and Rytwinski concluded that roads have an overall negative effect on wildlife.	The commenter fails to identify how the EIS makes a direct connection between roads and the probability of increased abundance of prey species. The EIS states, “In addition, the new roads would contribute to increased disturbance from human noise and activity, increase direct mortality of mule deer and pronghorn collisions with vehicles, and increase access for hunters. The increase in road density would also contribute to existing fragmentation and habitat degradation in the analysis areas.” See the Wildlife Movement discussion in Section 3.18.2.2.2 (Big Game Habitats and Populations, Impacts). The EIS also states “Overall, these studies suggest that wind energy infrastructure has little to no effect on smaller terrestrial wildlife species, but that increasing road density is likely to have negative impacts on most wildlife species.” See the Roads and Infrastructure discussion in Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B [Proposed Action]).
11535-86	Steven Andersen	The DEIS states “[d]isplacement of mule deer and pronghorn due to noise would cease after decommissioning once human noise and activity are reduced.”266 There is no support for this statement. Moreover, wind turbines produce noise which will continue to affect big game for the life of the project. Wind energy generation produces infrasound due to turbulence associated with spinning turbines producing vibrations that can propagate for tens of km and are detectable on broadband seismometers. Sounds produced by turbines are below the audible range of humans but can cause houses and other nearby structures to vibrate. The effects of these vibrations on wildlife may be similar to those associated with noise. Some animals are sensitive to frequencies below 40 Hz and are “exceptionally good” at perceiving low-frequency vibrations through their skin. Low-frequency stimuli from these sounds or vibrations are within the perceptible range of some animals that show unusual behavior before earthquakes.267 Long term exposure to sound can stress wildlife and alter behavior. Furthermore, experts have suggested that exposure to the electromagnetic nature of the wind turbines can be harmful to wildlife. These studies suggested that chronic exposure to athermal electromagnetic radiation could impact nervous, cardiovascular, reproductive, and immune system.	Impacts to big game from noise is discussed in EIS Section 3.18.2.2.2 (Big Game Habitats and Populations, Impacts), which specifically discloses the impact from noise disturbance associated with turbine operations on big game behavior and potential avoidance response. Noise associated with the project would occur during the 2-year construction period, 30-year operation period, and 2-year decommissioning period, which would result in approximately 34 years of noise. The BLM’s background literature review did not identify any publicly available literature indicating that vibration from operational turbines can significantly impact wildlife. Concerns with vibration from wind turbines are primarily related to the generation of low-frequency noise (also known as infrasound). Although research in this area is limited, the predicted effects of infrasound are similar to those for noise at audible frequencies (Lovich and Ennen 2013). The discussion of impacts to wildlife from noise in EIS Section 3.18 (Wildlife) and EIS Appendix 3 (Issues Analyzed in Brief) provide sufficient disclosure of effects to wildlife from noise, and therefore, further analysis of impacts from infrasound in the EIS is not warranted. Also see the response to comment 3873-2 (see in Table A-3t, Pollinators and Insects) for a discussion of impacts to terrestrial invertebrates from vibrations caused by wind turbines.
11535-88	Steven Andersen	The DEIS fails to address the overall effect of greater access to this region on illegal poaching and take of big game. The DEIS concludes that the magnitude of the effect of illegal take of big game cannot be estimated but the project itself is unlikely to lead to changes in overall take of big game species.271 Bromley suggests that hunting and poaching of wildlife was a problem associated with oil and gas exploration and development in wildlands.272 Similar scenarios could be envisioned at wind energy sites such as with this project. Bromley urges that firearms should not even be allowed on the project site and in vehicles using facility access roads.	The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state that “(a) EISs shall not be encyclopedic” and “(b) EISs shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues.” In order to comply with these requirements, the BLM identified issues for detailed analysis in the EIS through the internal and public scoping processes. The EIS states, “Because the new and improved roads would be open to public use, new roads would also increase the level of motorized access for hunters and other recreationists that may either directly kill mule deer and pronghorn (via vehicle strikes or hunting [see Section 3.12 (Recreation) for more detail]) or disturb or displace individuals due to human noise and activity.” See the Roads and Infrastructure discussion in Section 3.18.1.2.2 (Wildlife Movement [non-game mammals and reptiles], Alternative B [Proposed Action]). The potential for increased illegal take (poaching) is discussed in EIS Appendix 3, Wildlife AIB-54. Although it is assumed that illegal take (poaching) would increase as a result of improved access, the magnitude of this effect cannot be reasonably estimated.
11554-15	Raul Labrador; Idaho Attorney General’s Office	The Magic Valley region holds some of Idaho’s best hunting land for big game, upland bird species, small game, and waterfowl.1 The Project will devastate wild game and other animals in the area. The draft EIS recognizes this fact but gives it no weight. The agency admits that the Project will “substantially fragment” wildlife habitat and “greatly impair the ability of wildlife to move through the” 200,000 acres of public land the wind farm would occupy. DEIS at ES-xxiii. But the draft EIS fails to address the Project’s impact on Idaho wildlife. To start, the draft EIS only analyzes the Project’s impact on mule deer and pronghorn—it fails to analyze, or even consider, the Project’s impact on other game species. See DEIS at 3-462. Even so, this narrow analysis finds that the Project will irreversibly harm Idaho’s wildlife. For example, the draft EIS concludes that the Project would (1) permanently alter or destroy the seasonal habitat for mule deer and pronghorn, injure and kill many of these animals, DEIS at ES-xxiii; (2) permanently alter the habitat for deer and pronghorn and increase mortality for the species, DEIS at 3-477; (3) harm animals through turbine noise, vibration, and shadow flickering, id.; and (4) kill and injure many mule deer and pronghorn due to increased human activity—such as higher road density and construction activity. Id	The potential for impacts to general wildlife (which is inclusive of non-pronghorn and mule deer game species) is discussed in EIS Appendix 3, Wildlife AIB-61. BLM (2005) discloses effects to foraging resources and territory use for wildlife species resulting from the construction and operation of a wind energy facility (BLM 2005:5-35–5-85), which include the long-term loss of habitat within turbine, building, and access road footprints, and a long-term decrease in habitat quality within utility and transmission line corridors. Wildlife may also be displaced from suitable habitat due to noise and increased human presence. Beyond the issues discussed in detail in Sections 3.12.1 (Hunting and Trapping Access and Opportunities), 3.18.1 (Wildlife Movement [non-game mammals and reptiles]), and 3.18.2 (Big Game Habitats and Populations), project-specific disclosure of effects to foraging habitat and/or migratory and territory use for general wildlife would not exceed the level of effects included in BLM (2005). The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state that “(a) EISs shall not be encyclopedic” and “(b) EISs shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues.” In order to comply with these requirements, the BLM identified issues for detailed analysis in the EIS through the internal and public scoping processes.
11598-12	Idaho Conservation League	Big Game The Lava Ridge Wind Project analysis area is adjacent to two big game Winter Range and Migration Priority Areas for mule deer and pronghorn (Smoky-Boise Complex Priority Area and the Big Desert-Mountain Valley Complex Priority Area) as described in IDFG’s Idaho Action Plan (IDFG 2022). Pronghorn are also a	Cumulative impacts on big game from other proposed renewable energy projects within the analysis areas are disclosed in Section 3.18.2.2.7 (Big Game Habitats and Populations, Cumulative Impacts). The EIS states, “Development of planned energy projects would result in alteration of available habitat beyond that associated

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		Species of Greatest Conservation Need (SGCN), as listed in 4 Schuster E, Bulling L, Köppel J (2015) Consolidating the State of Knowledge: A Synoptical Review of Wind 811 Energy's Wildlife Effects. Environ Manage 56:300–331. doi: 10.1007/s00267-015-0501-5 Idaho's State Wildlife Action Plan. The analysis area for habitat used by mule deer and pronghorn is roughly 2.5 million acres and 1.5 million acres, respectively. Both species use the analysis area for essential winter range and, in the case of pronghorn, for stopover habitat. Ongoing studies by IDFG could also discover significant usage for stopover habitat and migration corridors by mule deer, as well. Pronghorn are also presumed to be using the area as fawning habitat. Approximately 87% of the analysis area has been altered due to agriculture, nonnative plants, roads, development, wildfire, vegetation treatments and reseeding projects. While fragmented habitat has concentrated wildlife movement in the remaining areas of relatively undisturbed habitats, wild ungulates have regularly found refuge in the area, especially during winters of extreme severity. However, low-quality forage due to recent fire events and agriculture/grazing practices may have reduced population fitness and carrying capacity compared to earlier periods with plentiful native plant forage. Current degraded range conditions also increase levels of competition amongst and between herds, leading to inevitable mortality increases. Considering all this, the fact that the DEIS calculates 84 years of additional vegetative impacts (i.e. habitat) through the decommissioning phase of the project, is especially concerning. In general, mule deer and pronghorn have not demonstrated an ability to adapt to industrialized habitats or habituate to human presence. Instead, those species tend to alter their behavior to avoid areas of disturbance and development. This requires higher energy expenditures at a time when wild ungulates are most reserve-depleted. Additionally, while the range of project alternatives allows for different sized footprints, they all present a similar variety of anthropogenic factors (roads, traffic, fencing, noise/"acoustic masking", human activity, infrastructure, etc.) that will likely reduce the individual and herd fitness of mule deer and pronghorn that use the area. These threats will impact movement, population migration connectivity and general behavioral responses to construction, operation and decommissioning activities. Other associated activities, such as increasing OHV/ORV use on lands within or directly adjacent to the project will further compound challenges to mule deer and pronghorn. Adding to these challenges, at least two other major industrial projects are planned for areas to the west of the Lava Ridge project - the Taurus Wind Project and the 500kV SWIP-North transmission line running to central Nevada. Should Lava Ridge be permitted in any of the BLM's current iterations, mule deer and pronghorn would likely be displaced to the east and west of the project area due to high levels of ground disturbance and degraded habitat mentioned above. The adaptive behavioral response to move to another area may ultimately be ineffective if these other areas also become developed. This scenario demands that BLM consider cumulative impacts from other industrial proposals, particularly in such close proximity to the Lava Ridge project. Perhaps equally as relevant as displacement from critical winter range (and associated biological stresses), all action alternatives for the Lava Ridge project are located in the highly significant north-south Owinza Pronghorn Migration Route5. Increasingly, evidence shows us that movement patterns are learned throughout a population of animals and loss of that "herd memory" and the associated behavior traits, can have profound effects on their long-term viability. We cannot support any alternative that would place turbines and associated industrial disturbance within the north-south travel corridor providing access to wintering habitat for one of the most consequential pronghorn populations in Idaho. Interestingly, mapping data documenting the route were based on only two mild winters (DEIS 3-473). Should ongoing pronghorn tracking efforts in the area produce viable data for the 2022-2023 winter, the BLM should examine differences of how animals used the same corridor and range during a winter of high snowfall and above-average precipitation. As pointed out in Figure 1, there are significant portions of the project area that are outside the Owinza Pronghorn Migration Route that may be able to support a wind development project with a smaller footprint. If the BLM develops such an alternative, the agency should also examine the scientific literature to see what type of buffer might be needed and what design features (timing for construction activities, etc.) are most effective at minimizing impacts. In terms of mitigating remaining impacts to pronghorn, we recommend that the BLM consult with the IDFG to identify several limiting factors to big game in that area. Potential mitigation activities could include establishing a significant fund to evaluate, remove or upgrade fences to allow easier passage for pronghorn or to revegetate degraded areas with native vegetation, among other efforts. Significant and meaningful guidance has been set forth in recent documents emphasizing the importance of incorporating migration corridors and movement ecology into public lands planning and wildlife management policy. For example, the Council on Environmental Quality memorandum "Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors"6 articulates several important points intended to inform federal decision-making about public lands: ● Connectivity and corridors should factor into high-level planning and decision-making at Federal agencies as well as into individual decisions that lead to well-sited and planned projects. 5 Kauffman, et al. (2022). Ungulate migrations of the western United States, volume 2. 10.3133/sir20225008. 6www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-fo rmatted.pdf ● Agencies should incorporate consideration of connectivity and corridors into the guidance for planning, siting, operation, and maintenance of Federal investments, including renewable energy development and infrastructure. ● In carrying out large-scale planning required by statutory mandates, Federal agencies should consider updating inventories of Federal resources under their associated management plans to assess connectivity and corridors. Such inventories can inform project siting decisions, protective designations, and where to carry out habitat restoration to enhance or restore connectivity between blocks of intact habitat. ● Designing infrastructure to facilitate wildlife movement, ecosystem processes, and ecosystem services ● Avoiding or minimizing adverse impacts that would fragment habitat identified as a priority for connectivity or corridors, and where not possible, offsetting or compensating for these impacts ● Federal agencies are encouraged to adopt proactive approaches in developing their proposed actions and projects, and	with the project footprints, and big game species avoidance behavior of areas of new development would further reduce remaining habitat availability in the analysis area and may result in an increase in depredation of agricultural crops near the project. The effects of habitat loss, disturbance from human activity and noise, and movement barriers would be greatest for wintering and migrating Owinza populations of both species, as development in the analysis area would be concentrated in the area south of ID 24 in an area that provides important winter habitat and resources during severe winters." The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use. The final EIS also includes a Mitigation Framework for Big Game (see EIS Appendix 4 [Mitigation]). The mitigation framework outlines compensatory mitigation strategies that would be implemented based on affected habitat quantity and quality.

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		to incorporate project siting and design elements that conserve, enhance, protect, or restore connectivity and corridors. ● Through the NEPA review process, Federal agencies can consider measures to advance corridors and connectivity as components of proposed actions, alternatives to proposed actions, or mitigation for proposed actions' effects. In addition to the recent memo on corridors and connectivity, SO 33627 also provides directives on the subject, as does IDFG's Idaho Action Plan8. ICL believes the future of a transitioning energy mix on BLM lands in Idaho must include siting decisions based on the guidance principles described above. Current land use practices, native vegetation restoration strategies and fire management tools must also be examined to arrive at practices that support intact migration corridors, connected habitats and healthy winter range for mule deer and pronghorn, as well as a wide diversity of nongame wildlife.	
11629-2	Ruth Harder	-This project would interfere with migration routes and grazing areas of big game animals. As they are pushed from BLM land, they would be forced onto private properties. Would this lead to relocation or depredation hunts?	The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The summary statement for this section states, "habitat loss and fragmentation in winter habitat may cause individuals to move into areas with higher human-wildlife conflict, such as agricultural fields or roadways, which may increase risk of direct mortality."
11634-5	Name Not Provided	A wildlife issue that requires additional examination is the impact of the proposed Lava Ridge Wind Project on migration corridors for big game including elk, mule deer, and pronghorn. In 2018, the Secretary of the Interior published Secretarial Order #3362: Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors, which "directs appropriate bureaus within the Department of the Interior (Department) to work in close partnership with the states of... Idaho... to enhance and improve the quality of big-game winter range and migration corridor habitat on Federal lands...". The information the DEIS uses to assess potential impacts to big game winter range and migration corridors, specifically in the context of the objectives of SO #3362, is inadequate. The analysis of the proposed project to elk migration is wholly missing from the DEIS--despite the clear inclusion of data showing successful elk hunting (as well as deer and pronghorn) in the project area.	The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The BLM is working closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game). Elk are discussed in EIS Appendix 3, Wildlife AIB-62, which describes that elk populations in the siting corridors and vicinity comprise small numbers of resident individuals and that the local population is being actively managed to maintain or reduce resident populations, with the goal of reducing competition for forage with mule deer and agricultural conflicts. The EIS determined that the project would not have a measurable effect on local elk populations. The CEQ implementing regulations for NEPA at 40 CFR 1502.2 state that "(a) EISs shall not be encyclopedic" and "(b) EISs shall discuss impacts in proportion to their significance. There shall be only brief discussion of other than significant issues." In order to comply with these requirements, the BLM identified issues for detailed analysis in the EIS through the internal and public scoping processes. No specific concerns with elk migration were raised during this time.
11871-15	WildLands Defense	Owinza- Gooding Pronghorn Routes The DEIS lacks adequate pre-decisional analysis and alternative actions to address and protect the Owinza pronghorn migration route, identified in a recent USGS wildlife corridor report. See: https://idahowildlife.org/news/big-game-migrations-habitat-connectivity-continue-to-be-central-focus-for-department-of-interior https://pubs.usgs.gov/sir/2022/5088/sir20225088.pdf The USGS site also includes concerns about increasing climate change stresses and threats impacting native ungulate habitats: https://pubs.er.usgs.gov/publication/cir1493, (Malpeli 2022). Ungulate Migration in a Changing Climate—An Initial Assessment of Climate Impacts, Management Priorities, and Science Needs "Migratory behavior among ungulates in the Western United States occurs in response to changing forage quality and quantity, weather patterns, and predation risk. As snow melts and vegetation green-up begins in late spring and early summer, many migratory ungulates leave their winter range and move to higher elevation summer ranges to access high-quality forage and areas with vegetative cover for protection during fawning. Ungulates remain on these ranges until the fall when increasing snowfall and decreasing temperatures trigger them to migrate back to their lower elevation winter ranges. While researchers have begun to assess the effects of physical barriers such as roads and energy infrastructure on migration, less attention has been paid to understanding how changing climate conditions might affect ungulate movements and range habitats. Does earlier spring green-up make ungulates leave their winter ranges sooner? Do persistent drought conditions reduce the carrying capacity of seasonal range habitats or lead to shifts in migration pathways? These and other questions remain largely unanswered but could have cascading effects on ungulate population dynamics and migratory behavior". "Physical barriers to movement such as roads and fences were identified as a core concern. In addition, the primary research needs of States are the acquisition and analysis of data on ungulate movements, to refine delineation of winter range, summer range, and corridors, and to support a better understanding of how ungulates use these habitats. When it comes to understanding climate effects, managers were more concerned with understanding the vulnerability of winter- and summer-range habitats than the vulnerability of migration corridors because of the influence of summer and winter forage on ungulate condition and reproductive success. Managers were also concerned about how forage quality and quantity might change because of stressors such as drought, wildfire, and invasive species and how they might need to alter habitat-treatment strategies as a result". The USGS Reports show the need for adequate scientific baseline data on numerous specific habitat components: "While migrating between seasonal ranges, animals require access to adequate forage to maintain and renew energy reserves. As a result, many long-distance migrants spend part of their migration period in habitat patches along movement routes known as "stopovers," where animals can rest and forage (Dingle and Drake, 2007). This phenomenon is well-studied among flying avian migrants but not among land migrants (Sawyer and Kauffman, 2011). The emerging literature on the use of stopovers by ungulates demonstrates that these sites play a crucial role in their migration strategies. Most notably, Sawyer and Kauffman (2011) found that mule deer in Wyoming spent 95 percent of spring and autumn migration in stopover sites. Seidler and others (2015) found that pronghorn in Wyoming spent a significant portion of the spring migration period (78 percent) in stopovers. These sites had higher forage quality than movement corridors, and deer used the same stopover sites for years. During their	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the location and use of mapped migration and movement corridors and stopover sites, and the range of potential impacts on these corridors and stopover sites based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The BLM is working closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use, including additional stopover sites that have been identified. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).

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		spring migration, deer used stopover sites 44 days before peak green-up (Seidler and others, 2015), enabling them to exploit vegetation during the period of growth when plants are more easily digestible. Had deer not used these sites, they would have arrived on their summer ranges several weeks before optimal forage conditions. These results suggest that ungulates can reduce the amount of time they need to spend on the winter range by using stopover sites …". "The results of these and other studies led to a growing awareness about the importance of conservation strategies that prioritize stopover locations and the maintenance of connectivity between those locations …".	
11871-16	WildLands Defense	USGS Reports describe: "Migratory Bottlenecks. Bottlenecks are features of migration routes that can influence ungulate movements. Bottlenecks are narrow areas along migration routes where landscape features such as vegetation, topography, or human development restrict the width of the corridor and, therefore, animal movements (Sawyer and others, 2005). Bottlenecks are often less than 1 km wide and can be as narrow as 100 meters (m) (Berger and others, 2006). Because of their small area, minor changes to the habitat in these corridors can completely sever established migration routes. Anthropogenic threats to migration and seasonal ranges. The anthropogenic threats facing migratory ungulates in the Western United States are numerous but can be grouped into two broad categories: (1) threats that affect habitat quality on seasonal ranges and migration routes and (2) threats that affect movement during migration. Environmental conditions drive some threats; others are the result of human disturbance. Anthropogenic threats to ungulates include urbanization, residential development, transportation infrastructure, fences, energy development, and the conversion of natural land cover to agriculture (Christie and others, 2015), and can result in both habitat loss and the disruption of migration. Fences – can block or later movement, can cause mortality. [There is no baseline of the status of habitats and populations of big game using this particular landscape – and the adverse conditions and barriers they may already face (roads, powerlines, housing development, fire loss of shrubs needed in hard winters, failed BLM fire rehabs. Etc.) Studies suggest that ungulates alter their migratory behavior in response to energy development. For example, Sawyer and others (2013) found that mule deer can migrate through moderate levels of energy development, but in areas of intense development, behavioral changes were identified, including detouring from traditional migration routes, increasing the rate of movement, reducing the use of stopover sites, and reducing the use of migration routes".	See response to comment 11871-15 (see in Table A-3aa, Wildlife, including Big Game). Additionally, The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the current effects of conditions such as existing movement barriers, habitat fragmentation, and forage conditions in Sections 3.18.2.1.1 (Mule Deer, Existing and Future Trends and Actions) and 3.18.2.1.2 (Pronghorn, Existing and Future Trends and Actions). This information represents the best available scientific information at the time of writing.
11871-17	WildLands Defense	Given the extensive human development in many areas of the Snake River plain and the region - with roads, extensive fencing barriers and hazards, wildfire habitat losses, flawed and failed BLM fire rehabs , wildlife habitat degradation and competition with livestock, and overall escalating human disturbance, Pronghorn across this Snake River plain landscape really have few to no other choices of places to go in winter at present. Will populations of these animals be wiped out on public lands - as massive industrial energy sprawl descends? Will they have no place to go to survive winters? The full cumulative effects on all the winter range habitat conditions across lower elevation lands are also planned to potentially be crammed full of industrial energy projects and this has not been critically assessed in a hard look NEPA analysis. There are an immense number of other foreseeable industrial energy projects, and walls of existing private land wind turbies.. See Basin and Range Watch and WildLands Defense comments on the new BLM Solar EIS scoping. Further, the infrastructure bill is laden with huge subsidies that may lead speculators to destroy sensitive species habitats and public lands recreational use areas for industrial energy projects that turn out to be failures. See map of known BLM energy ROW applications in only this central portion of the Snake River region -and it does NOT show all the private land projects: This map of public lands "renewables" projects shows - based on just applications now and not others that may be foreseeable – that there will be no place for Pronghorn (and many other species to inhabit or move to fulfill their seasonal needs. The map does not show the veritable Wall of wind farms on private lands all across the Snake River plain from east of Mountain Home to the Wyoming border. USGS Ungulate Migrations Vol. 2 – Owinza https://pubs.usgs.gov/sir/2022/5008/sir20225008.pdf Owinza-Gooding Pronghorn Migration "The Owinza pronghorn winter herd migrates by weaving through lava fields below the Mount Bennett Hills and further to the east in the Snake River Plains in Idaho (fig. 37). The seasonal migration moves north, traversing the Picabo Hills into the eastern side of Camas Prairie and west side of the Wood River Valley. This summer range is shared with members of the Gooding herd to the west. Wildlife unfriendly fencing, lava fields, and vehicular traffic endanger the ability of the herd to conduct this seasonal migration. Wildfire and the subsequent invasion of cheatgrass further degrade natural habitat. Future housing development in the Wood River Valley and associated energy developments are likely to challenge the longevity of this seasonal migration". Wild ungulates - like many other wildlife species – are adversely impacted and stressed by industrial wind and transmission lines in ways not yet fully understood: Wind Turbine Stress on Ungulates: https://www.sciencedirect.com/science/article/pii/S1470160X20305951 "We examined the impact of wind farms on the stress levels in roe deer based on seven wind farms of various sizes (of 12–27 turbines) in eastern Poland. Fecal cortisol concentration was assessed with the ELISA method in droppings collected during the winter period. We found that the roe deer exhibited an elevated stress level in the area of larger farms, but such response was not found in the case of smaller wind farms. The roe deer were also characterized by a higher stress level in areas of wolf predation, but this factor was less important. Both the area of the farm and the number of turbines explained the phenomenon of the increased stress in the roe deer. We estimated 824 ha or 18 turbines as a threshold level of the impact of wind farms on the cortisol concentration in the roe deer. We conclude, that turbines should be concentrated in the smallest possible area". "… given the economic and cultural importance of ungulate species and their known sensitivity to other forms of anthropopressure, understanding wind energy impacts on these species should be a high priority. It should be remembered that wind farms are often built far away from human settlements, i.e. in wildlife refuges (Helldin et al., 2012).	See response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game). The analysis areas for direct, indirect, and cumulative impacts to mule deer and pronghorn were developed in collaboration with IDFG and are based on the best available scientific information (recent radiotelemetry data and habitat modeling) and the knowledge of regional subject matter experts. These analysis areas represent an estimation of the annual range (inclusive of winter and summer seasonal ranges and identified likely migration routes) of the population of mule deer and pronghorn that use winter habitat located in and near the siting corridors (see Section 3.18.2 [Big Game Habitats and Populations] for a detailed description of how these analysis areas were delineated and the contributing data). CEQ Regulations define a cumulative impact as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions [RFFAs] regardless of what agency (Federal or non-Federal) or person undertakes such other actions" at CFR 1508.7. RFFAs are actions that may affect projected impacts of a proposal and are not remote or speculative. The BLM developed the RFFAs within Section 3.1.1 in coordination with cooperating agencies and in response to public input.

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		Therefore, the introduction of wind farm infrastructure into such a refuge can potentially disturb wildlife populations". Very harmful impacts of wind turbines impacts to reindeer are attracting world-wide attention: "Norway wind turbines should be torn down, reindeer herders say: Norway should dismantle two large wind farms that were stripped of their licences for jeopardising traditional reindeer husbandry, herders from the indigenous Sami community said on Friday …The country's supreme court last month ruled that the Storheia and Roan wind farms, located on the Fosen peninsula in central Norway, violated herders' rights under international conventions, and found their operating permits invalid". Also: "Reindeer herders in the Nordic country say the sight and sound of giant wind turbines frighten their animals and thus disrupt age-old traditions". "Reindeer and wind turbines cannot coexist." Also "We find greater changes in the animals' land use after the establishment of wind power than in previous research in Norway and Sweden, says researcher Sindre Eftestøl to Klassekampen. Together with colleagues from the Norwegian University of Environmental and Life Sciences, he has been researching the reindeer herd of Frode Utsi and Rákkonjárga reindeer owners since 2011. The reindeer graze in an area within a ten kilometer radius of the wind turbines significantly smaller than before. They graze more frequently in other areas. There are signs that the animals dislike the sight of the wind turbines. During the calving period, reindeer largely get calves in areas where the turbines are not visible. The migration patterns of the reindeer have changed. The research was done by attaching GPS collars to 30 reindeer. Information from reindeer owners in the area is then compared against movement data from the herd. There is mostly a large correspondence between the reindeer owners' experiences and the GPS data. Rákkonjárga has a reindeer herd near Berlevåg in the summer, where 15 wind turbines have been installed. The turbines scare the reindeer: - We are most afraid of clear weather and good visibility. Then reindeer see the wind turbines, then they turn. We have a lot of extra work to herd the animals north, says Utsi to Klassekampen. He fears that the situation may get worse, because another 15 wind turbines are planned in the same area. - Then there will be even smaller grazing areas in the north. The pressure on the rest of the grazing areas will be even greater, says Utsi to Klassekampen". https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.4476 https://reindeerherding.org/news/195-reindeer-and-wind-turbines-cannot-coexist https://www.reuters.com/business/environment/norway-wind-turbines-should-be-torn-down-reindeer-herders-say-2021-11-12/ Pronghorn Turbine Avoidance: " … showed that pronghorn did not, in fact, like being around wind turbines in winter. But Beck and others could not determine the exact physical toll that aversion has on pronghorn. So in 2018, the Wyoming Game and Fish Department, the USGS Cooperative Fish and Wildlife Unit at the University of Wyoming and Invenergy, then PacifiCorp, paid for a six-year study looking more in depth at the question of what impact wind turbines have on pronghorn, both in the winter and summer". AND: "With three years of the study done, coop director Matthew Kauffman can off er a few clues. First, wind turbines do displace pronghorn, which in return lose valuable food especially in winter months. Second, and maybe even more importantly, more than a decade of animal tracking data shows it's possible to site wind turbines in places that have less of an effect on Wyoming's speedgoats in a way that still allows for wind development. "We know there is a negative effect, and we would fully expect that to translate that animals don't eat as much, they don't put on as much fat, they don't survive the winter as well and have as many young, all of those are logical," Kauffman said. "But our methods end up being somewhat crude when we try to connect that to reduced survival or population growth …". https://www.wyomingnews.com/rocketminer/news/state/sum-of-avoidance-studies-show-pronghorn-avoid-wind-turbines/article_423a9a0a-c0f0-50f9-9c5e-af4d288c1990.html Smith et al. 2019: https://www.sciencedirect.com/science/article/abs/pii/S1550742419301150 "Few studies have evaluated the response of ungulate populations to wind energy development. Recent demand for wind-generated electricity coupled with a tendency for wind-energy facilities to be sited within suitable pronghorn (Antilocapra americana) winter range make this a critical issue for conservation of this icon of western North America. We evaluated pronghorn response to wind energy development at the winter home range scale, as well as within individual winter home ranges using data collected from 47 adult female pronghorn equipped with Global Positioning System transmitters. At both scales, we developed separate resource selection models for pronghorn before (winter 2010) and after (winters 2011 and 2012) development of the Dunlap Ranch wind energy facility in south-central Wyoming to evaluate the potential impacts of wind energy infrastructure on pronghorn winter resource selection. In general, pronghorn winter resource selection was correlated with greater sagebrush (Artemisia spp.) cover, lower snow depth, and lower slopes before and after wind energy development at both scales. At the larger scale, pronghorn selected home ranges closer to wind turbines during all winters. Within home ranges, pronghorn selected areas closer to future locations of wind turbines at Dunlap Ranch during 2010 before turbine erection. However, we found evidence that pronghorn avoided wind turbines in winters after development within their winter home ranges. This relationship was most evident during winter 2011, which coincided with the most severe winter of our study. Long-term replicated studies will be necessary to make inferences for pronghorn populations exposed to wind energy development in different environments and scales than we evaluated. Nonetheless, in the absence of additional information on how ungulates respond to wind energy development, our finding that pronghorn avoided wind turbines within their winter home ranges has important implications for future wind development projects, particularly in areas known to fulfill important seasonal requirements of pronghorn populations. See also Milligan et al. 2021. https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.3850 Also Milligan et al. 2023: https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.9687 Ecosphere. Variable effects of wind-energy development on seasonal habitat selection of pronghorn Megan C. Milligan, Aaron N. Johnston, Jeffrey L. Beck, Kurt T. Smith, Kaitlyn L. Taylor, Embere Hall, Lee Knox, Teal Cufaude, Cody Wallace, Geneva Chong, Matthew J. Kauffman First published: 09 December 2021 https://doi.org/10.1002/ecs2.3850 "There was a trend toward increased displacement during the study and behavioral avoidance was apparent for individuals in close	

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		proximity to turbines. However, pronghorn were highly variable in their fine-scale habitat selection, across both individuals and years, which could make effects of wind energy development difficult to detect. Nevertheless, some individuals, particularly those close to wind-energy facilities, did avoid turbines, which could translate to population-level behavioral or demographic changes over time and affect the resilience and stability of the population. Over time, the accumulation of development, including wind turbines, roads, and fences, can both limit movement and fragment habitat, potentially reaching a critical threshold beyond which populations are negatively impacted". Avoid migratory pathways and leks. This project does neither. http://wildlife.org/wp-content/uploads/2014/12/TWS_Impacts-of-Wind-Energy-Development-on-Wildlife_Dec-2014.pdfa Mule Deer. https://wyofile.com/study-mule-deer-other-species-struggle-to-adapt-to-altered-habitats/ 'A 2017 study by Sawyer showed that the Sublette mule deer herd declined by about 40% over 15 years. They "made fine scale-behavioral changes to avoid habitat close to infrastructure, yet they continued to return to the same winter range year after year," the paper reads. Less winter range meant less food, which meant fewer animals could survive. That's why some proposed solutions, such as off-site mitigation for energy development, may not work, the researchers say. That's why some proposed solutions, such as off-site mitigation for energy development, may not work, the researchers say. The best solution, Merkle said, is to conserve existing migration routes for future generations" A relevant article on site fidelity – and how harmful loss or degradation of specific habitats may be: Site fidelity as a maladaptive behavior in the Anthropocene Jerod A Merkle, Briana Abrahms, Jonathan B Armstrong, Hall Sawyer, Daniel P Costa, Anna D Chalfoun. First published: 11 January 2022 https://doi.org/10.1002/fee.2456 Citations: 10 "Site fidelity, or the behavior of returning to previously visited locations, has been observed across taxa and ecosystems. By developing familiarity with a particular location, site fidelity provides a range of benefits and is advantageous in stable or predictable environments. However, the Anthropocene is characterized by rates of environmental change that outpace the evolutionary history of extant taxa, which can result in site fidelity becoming maladaptive".	
11873-19	Mary Schwartz, Frank Schwartz	21. Impacts to big game and wildlife presented in the DEIS are generally not acceptable during the construction, operation and decommissioning periods. Proposed mitigative measures do not resolve the impacts. This includes the impacts to habitat, wildlife movement and populations as noted in Table ES-2, as well as other things addressed in this set of comments which were not considered in the draft EIS	See response to comment 6885-2 (see in Table A-3aa, Wildlife, including Big Game).
11978-45	Magic Valley Energy, LLC	Section 3.18.2.2.2 Wildlife – Big Game Impacts (Alternative B) 42. The DEIS states: "Project activities that would impact mule deer and pronghorn include human activities (e.g., vehicle use, construction equipment, maintenance activities), wind turbine operation (e.g., noise, vibration, shadow flicker caused by moving blades), and ground disturbance that would remove or alter habitat." a. MVE Comment: MVE and its biological resources consultants are aware of no scientific evidence demonstrating that noise, vibration, or shadow flicker from operating turbines cause avoidance or other impacts to mule deer and pronghorn. MVE therefore requests that this language be removed from the analysis, unless these impacts have been demonstrated in the literature.	Several studies on noise disturbance of ungulate species, include mule deer and pronghorn, have been conducted and while no specific threshold has been identified, the studies describe that wildlife responses begin at approximately 40 dBA (Shannon et al. 2016). A recent study of mule deer habitat use on a natural gas field indicate that use decreases under high noise conditions of 77 dB(C) (Kleist et al. 2021). A study of Sonoran pronghorn responses to noise on a military training range in Arizona indicates that pronghorn use decreased in areas with greater noise (more than 55 dB) (Landon et al. 2003). As the ground level noise from operational turbines has been modeled at 73.9 dB from the turbine hub and 85.3 dB from the blade, there is sufficient evidence to estimate that noise from turbine operations would have an effect on mule deer and pronghorn habitat use in the vicinity of turbines. These studies have been incorporated into the final EIS. The sentence was revised to state, "Project activities that would impact mule deer and pronghorn include human activities associated with project construction and operation (e.g., noise, vehicle use, construction equipment, maintenance activities), wind turbine operation (e.g., noise) and ground disturbance that would remove or alter habitat."
12934-1	Rob Thornberry, Theodore Roosevelt Conservation Partnership	Unfortunately, none of the four action alternatives in the Lava Ridge DEIS address the current needs of the Owinza pronghorn herd, which migrates annually to winter range within the project area. In 2019 and 2020, Idaho Department of Fish and Game biologists captured 11 pronghorn does and fitted them with GPS collars. These pronghorns move as many as 103 miles from the summer range in the Picabo Hills to the winter range, which could soon be covered in windmills. Although the DEIS outlines significant loss of pronghorn habitat in the analysis area, the DEIS's action alternatives do not adequately address the project's further fragmentation of this finite pronghorn migration corridor and winter range. The latest research on the effects of utility-scale wind development on pronghorn documents variable habitat loss due to behavioral avoidance and displacement away from areas near wind turbines.1 Behavioral avoidance of wind turbines has also been demonstrated when pronghorn select stopover sites in spring and during winter. Pronghorn also moved more quickly near turbines in spring and reduced fidelity to migration routes relative to wind turbines under construction in both spring and fall.2 These behavioral adjustments made by pronghorn relative to wind turbines could reduce foraging success and the functional benefits of their migration over the long term. Loss of migration corridors could hamper pronghorn long term. All four action alternatives truncate the Owinza pronghorn migration and do not account for functional habitat loss due to behavioral avoidance and displacement near wind turbines. And although BLM and the applicant acknowledge the project could have population level effects on the area's pronghorn herd, there appears to be little in the action alternatives that applies the mitigation hierarchy of avoidance, minimization, and (as a last resort) mitigation of unavoidable adverse impacts. Simply put, the four action alternatives miss the mark on all accounts: they provide no effort to avoid the migration route; there appears to be no effort to minimize direct ground disturbance within the mapped migration route; and the plan's mitigation language is too vague to ensure that impacts will be effectively offset. Maintaining connectivity between geographic areas – winter ranges, summer ranges and transition areas – is essential to the long-term viability of wildlife populations and the economies that survive on these resources. Accessing seasonal ranges is vital for the existence of sustainably managed populations of big game animals. Migration between seasonal ranges has nutritional underpinnings and disturbance potentially alters the net benefits of migration if animals avoid	The BLM is working closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use. The BLM's Mitigation Handbook (H-1794-1) was used to develop the mitigation plan included in the final EIS, which follows the hierarchy of avoidance, minimization, and mitigation. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).

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		developed areas or move through them too quickly to meet foraging requirements necessary to maintain healthy survival and reproduction rates. Without the ability to move freely between the best habitat conditions on any one range, degradation and habitat loss on other ranges can't be offset. Intact habitat that supports both short and long-distance migration needs aids animals in coping with seasonally variable conditions that driven by availability of resources, harsh climatic conditions, predators, parasites, disease, and other factors related to reproduction such as mate procurement, drought, breeding sites, and juvenile survival.	
13000-6	Nathan Small	The Tribes would like the BLM to consider the following comments while making your recommendations for evaluation in the final EIS and particularly when drafting the Record of Decision for the project.... The analysis of impacts to wildlife relies on stale information. Big Game Migration route information is approximately 15 years old.	The BLM is working closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use.
13006-11	Leon Smith	2) Recommend BLM use most current Fish and Game data on big game density, populations, migration routes and noise impacts (regarding the model used, 15 yr old data).	See response to comment 13000-6 (see in Table A-3aa, Wildlife, including Big Game).
13006-18	Leon Smith	9) Recommend BLM work with IDFG to analyze a potential of private land depredation and the resulting issues, as big game are displaced from public lands onto private lands, including the additional depredation cost to IDFG and sportsmen.	The potential for increased depredation on private lands has been incorporated into the final EIS analysis. Future depredation costs cannot be quantified and would be the responsibility of IDFG and are outside the scope of this analysis.
1953-1	Allan Lloyd	The elk and deer and many other species use these areas for winter habitat. It is a proven fact that wind turbines make high pitched noises that disrupt the environment and will make these areas uninhabitable for these animals and birds. This habitat will be ruined for hundreds of years into the future. Why is the BLM not protecting these animals?	Impacts to big game from noise is discussed in EIS Section 3.18.2.2.2 (Big Game Habitats and Populations, Impacts), which specifically discloses the impact from noise disturbance associated with turbine operations on big game behavior and potential avoidance response. Noise associated with the project would occur during the 2-year construction period, 30-year operation period, and 2-year decommissioning period, which would result in approximately 34 years of noise, not hundreds of years as noted by the commenter. EIS Appendix 4 (Mitigation) includes a complete list of design features and minimization and mitigation measures that would be implemented to minimize or avoid impacts to big game species.
3150-2	Cameron Stauffer	First, how will the Lava Wind project effect the thousands of big game animals most notably, deer, and pronghorn? Big game populations are increasingly under pressure because of urban sprawl in Idaho. According to Idaho Fish and Game, depredation is a chronic issue the state faces when managing wildlife. Winter habitat and adequate migration corridors are crucial to having healthy heard dynamics, as well as limiting depredation. Collisions with big game also increase with population growth and inadequate migration corridors. After conversation with IDFG and BLM, it is impossible to know what will happen to the big game populations, or their behaviors, if the project is approved. Depending on the proposal, up to 2,427,698 vehicle trips, 270-486 miles of new roads, up to 395 miles of temporary fence, up to 9,114 acres of disturbance, 5 new substations, 525 blasting days, etc. The EIS does state this will affect the behavior of big game and goes into some detail on how they hope to mitigate the effects. However, there is very little information when it comes to numerous questions that arise. The EIS cannot say if big game will leave the area entirely, partially, or if they will make new migration paths. At the BLM open house, it was said directly; it is impossible to say how much of a behavioral impact this proposal will have, as well as if it will have a population impact on any of the big game species.	The BLM acknowledges that it is currently uncertain how big game species will respond to the project, if approved. The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The analysis notes that the intensity of effects would be correlated with environmental conditions, such as winter severity, which cannot be predicted into the future with reasonable accuracy. As a result of this uncertainty, the EIS includes a Mitigation Framework for Big Game (see EIS Appendix 4). See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
3230-3	Gary Carney	Our elk herds winter throughout this range. I have personally witnessed elk and deer herds in the hundreds and antelope herds in the thousands. All of these animals use this ground as their winter range. The elk herds in North America have already been depleted and there are many programs to try to establish elk in different parts of the country. This however, is a winter range that has worked traditionally for thousands of years and herds will be likely be forced into less livable areas. Again, very little due diligence has been done to address these serious issues. Idaho is blessed with having If the elk leave, the hunters will have to go elsewhere. This may seem like a problem to the hunter, but makes a bigger problem for the sport of hunting and the issue overall issue of conservation. Elk, antelope, deer, sage grouse, migratory birds, and many other species are hunted on the Kimama Desert, and practicing hunters will be going elsewhere for their harvests. The unintended consequence will force sportsmen to different areas and this will have a serious adverse affect on our public lands throughout the state and neighboring states. Again, more due diligence is required.	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the current status of populations and distribution and important of winter range for mule deer and pronghorn, and the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). Elk are discussed in EIS Appendix 3, Wildlife AIB-62, which describes that elk herds in southern Idaho are generally robust, and populations are limited more by depredation control than by habitat suitability. The EIS determined that the project would not have a measurable effect on local elk populations. See also the Impacts analysis provided in Section 3.12.1 (Hunting and Trapping Access and Opportunities).
5896-15	Mike Tylka	Hunting. Any largescale project of this kind has a severe disruption on large game populations such as deer, pronghorn and elk population. This project is located in the migratory path of these animals. I have personally witnessed hundreds of deer in the wintertime near the canyon rim. Acquaintances of mine have harvested trophy elk from the project area.	See response to comment 3230-3 (see in Table A-3aa, Wildlife, including Big Game).
6868-4	Barbara Martien	More long term detail on the effect to the pronghorns. The plan goes right thru their migration pathway. As noted on the map.	The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). The BLM worked closely with IDFG to compile and analyze the best available information to disclose impacts as accurately as is possible. The final EIS incorporates new information collected since the publication of the draft EIS regarding pronghorn and mule deer movement and habitat use. See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
6885-2	Louis Zamora; Twin Falls Canal Company	Deer, Elk, and other big game will struggle. If we cover the land with projects, it will limit places for these animal's roam and thrive. Right now there are road closures on BLM lands to protect wintering big game. In BLM's own press release it stated "The Bureau of Land Management Burley Field Office will extend the seasonal motorized travel closure in the South Hills area, south of Twin Falls, to Saturday, April 15, 2023. Roads in the area are still snow covered and wintering deer herds are hanging in the lower elevation areas, needing	The EIS discloses current conditions (see Section 3.18.2.1 [Big Game Habitats and Populations, Affected Environment]), including the current status of populations and distribution and important of winter range for mule deer and pronghorn, and the range of potential impacts based on the most recent scientific literature at the time

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		additional protection." I know this was for the South Hills but there are wintering animals in the Lava Ridge and Taurus areas too. As winter fat reserves on these animals are running low it is crucial to not harass these animals and cause further stress and or mortality to them. Thousands of vehicles and all the construction sites (road, windmills, powerlines, blasting, etc.) would definitely cause stress. One reason animals migrate and winter in these areas is because of how few roads there are, which limits some of the contact with us humans. By adding hundreds of miles of roads the interaction between us and the animals grows exponentially and the chances of causing stress to the animals grows exponentially.	of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]). See also response to comment 11598-12 (see in Table A-3aa, Wildlife, including Big Game).
7784-2	Barbara Martien	This complex will have a lasting impact on the natural habitat of the Pronghorn and many other wild life in the area.	The EIS discloses the range of potential impacts based on the most recent scientific literature at the time of writing (see Section 3.18.2.2.2 [Big Game Habitats and Populations, Impacts]).

Project Element Topics

Applicant's Interest and Objectives

Table A-3bb. Applicant's Interests and Objectives

Comment ID	Commenter	Public Comment	Response to Comment
1042-22	WildLands Defense	The Lava Ridge Wind Project, proposed by Magic Valley Energy and LS Power for public lands in Jerome, Lincoln and Shoshone counties, would dwarf south-central Idaho's existing turbines in both number and height. [WHY is there a "need" for both the number and heights proposed by this greedy developer?	MVE outlines their purpose and need for the project in Section 1.2 in MVE (2023) as follows: "MVE's purpose for the project is to reliably and economically produce renewable energy with wind turbine generators for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed along the permitted, but not yet constructed, Southwest Intertie Project – Northern Portion . . . The need for the project arises from regulatory, utility, and consumer driven objectives to incorporate increasing amounts of renewable/carbon free energy sources into energy supply portfolios. Substantial amounts of new renewable energy resources are required to meet this need. A majority of states in the western U.S. have specific renewable energy goals."
1054-5	Jeff Juker	Is the energy contracted to anyone?	See response to comment 1042-22 (see in Table A-3bb, Applicant's Interests and Objectives). At this time MVE has not identified a power purchase agreement with a specific utility as they will not be able to commit to supplying energy needs until after a decision is confirmed on the project by the BLM.
11782-6	Ken Fitch	For the applicant, is this the optimal location for this entity in terms of actual efficient production (especially with any adjustments determined through the NEPA process)? There are some who are questioning these matters.	MVE outlines their consideration for siting the project in the general area and earlier efforts to develop the project in other locations. This information can be found in MVE (2023) and in Alternatives Considered by MVE (Appendix C in MVE [2023]).
11787-1	Representative Jack Nelsen	My largest overriding concern is the fact that LS Power has done absolutely nothing to mitigate the effects of their project on the local communities. Other than a few feel-good community meetings, LS Power has made zero effort to meet with local road departments, highways districts and other governmental agencies and offices of the surrounding communities. To think they can propose (and push) a project of this magnitude while circumnavigating the local communities and its citizen concerns is appalling.	EIS Appendix 4 provides a description of applicant-committed measures and other measures being considered by the BLM for the purpose of avoiding and minimizing impacts. These measures have been developed following BLM policies and informed through both the BLM's and MVE's outreach with stakeholders (including highway districts and local county commissioners). In the evaluation of MVE's proposal, the BLM has implemented a robust public process facilitating the recite of thousands of comments that have been used to inform the preparation of the EIS and will ultimately inform the BLM's decision.
11822-5	Bob & Linda Sojka	The user distance issue is also important because of the extravagant transmission losses associated with siting so far from the dominant points of use. That distance-induced transmission loss underscores a monumentally flawed design/operational/cost consideration.	MVE outlines their purpose and need for the project in Section 1.2 in MVE (2023) as follows: "MVE's purpose for the project is to reliably and economically produce renewable energy with wind turbine generators for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed along the permitted, but not yet constructed, Southwest Intertie Project – Northern Portion." In order to supply energy markets across the western United States MVE would need to use the transmission lines that contribute to providing a reliable energy grid in the western United States. The use, operation, and maintenance of the larger electrical system is outside the scope of the BLM's evaluation of the project. The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. MVE completed siting analysis and used the latest computer modeling to assist in their selection of the project area as a viable wind energy facility. MVE has also established meteorological stations to gather additional information on the wind resources within the project area.

Comment ID	Commenter	Public Comment	Response to Comment
11873-18	Mary Schwartz, Frank Schwartz	20. MVE should be responsible for funding an independent study/analysis to address the compatibility with or impact to virtual fence systems from emf, structures and their location, or other aspects of the wind farm. The findings should be documented in the DEIS.	An evaluation of known communication interference issues is described in EIS Section 3.8 (Land Use and Realty) and will be re-evaluated after a final design of the project. Expected interference will be address prior to an NTP with construction is granted, if an authorization is granted.
12059-2	Martin Bender	Magic Valley Energy (which despite the name “Magic Valley” theoretically indicates it should be entirely founded and based in Idaho) is a branch of LS Power, a New York Company, as reported by Magic Valley Energy’s website, and local news. The fact that a New York-based company is interested in Idaho is disconcerting to me (more so in the sense that they seem to be only interested in making use of our resources for their benefit). Though the most upsetting part of this to me, is that the power generated by Lava Ridge may not be used to help Idahoans, instead could well be shipped out to California for use there, per reporting from Idaho GOP Chairwoman Dorothy Moon[1]. Of course, considering that LS Power has business in California, I can’t help but wonder if the goal of Lava Ridge is simply to make energy for California to use (but out of state so it doesn’t mess up California’s environment), or if there are other reasons it is being pushed on Idahoans. Regardless, I believe there is a strong conflict of interest at play in this situation.	MVE outlines their purpose and need for the project in Section 1.2 in MVE (2023) as follows: “MVE’s purpose for the project is to reliably and economically produce renewable energy with wind turbine generators for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed along the permitted, but not yet constructed, Southwest Intertie Project – Northern Portion. . . . The need for the project arises from regulatory, utility, and consumer driven objectives to incorporate increasing amounts of renewable/carbon free energy sources into energy supply portfolios. Substantial amounts of new renewable energy resources are required to meet this need. A majority of states in the western U.S. have specific renewable energy goals.”
12083-2	Adrian Arp	Another concern related to the business side of the Lava Ridge project is the possibility that it would be sold in the future. Recently, when Luke Papez of MVE was asked if MVE was forbidden from selling the Lava Ridge enterprise sometime in the future, he stated that there was nothing to prohibit this company from selling Lava Ridge. For the sake of National security and US sovereignty, provisions must be in writing, prohibiting the sale of the Lava Ridge project to any foreign adversaries such as China or Russia.	If an authorization is granted by the BLM to MVE and the business is subsequently sold, the BLM would follow all laws, regulations, and policies for assigning the rights granted to MVE to the new owner.
12976-6	James Komadina	d. The LS Power website provides the following information that, in conjunction with the 'One Nevada Transmission Line' and 'Harry Allen to Eldorado 500KV Transmission Line', the SWIP North Intertie Project can be described as "SWIP North is a 285-mile 500 kV transmission line under development in Idaho and Nevada. SWIP North will provide new transmission capability to deliver renewable wind, geothermal and solar energy resources north and south by resolving a significant missing link in the western grid. In addition the project will enable bulk reliability enhancements, congestion relief, economic energy exchange, and energy imbalance market opportunities through connectivity of the Northwest and Mountain West electricity markets to the Desert Southwest and California ISO." i. The DOE Office of Energy Efficiency and Renewable Energy Land-Based Wind Market Report: 2022 Edition, Executive Summary notes "Wind power purchase agreement prices have been drifting higher since about 2018, with a recent range from below $20/MWh to more than $30/MWh." "Among the regions reporting data, CAISO ("California Independent System Operator") features the highest pricing (~$52/MWh once converted to 2021 dollar terms)". 11. The socio-economic study, Black, G., and S. Peterson. 2020. Economic and Fiscal Impacts Report: Two Proposed Southern Idaho Wind/arms and the SWIP-North Transmission Line in Southern Idaho and Eastern Nevada, discloses the 2020 estimated capital cost of Lava Ridge and SWIP North to be $1.367 billion and $0.548 billion, respectively. m. The 2022 signed Inflation Reduction Act ("IRA") allows for the following Production Tax Credits for Electricity from Renewables: 1. "Base Credit Amount: $0.03/kW, inflation adjusted 2. Bonus Credit Amount: Credit is increased by 5 times for projects meeting prevailing wage and registered apprenticeship requirements. Credit is increased by 10% if the project meets certain domestic content requirements for steel, iron, and manufactured products. Credit is increased by 10% if located in an energy community." 1v. COMMENT - DEIS disclosures and commercial reason indicate that all visual, cultural, and recreational impacts of Lava Ridge will be borne by citizens of the greater Twin Falls area while the generated power will be delivered to CASIO. The expected interstate power flows need to be clearly presented in the DEIS.	MVE outlines their purpose and need for the project in Section 1.2 in MVE (2023) as follows: “MVE’s purpose for the project is to reliably and economically produce renewable energy with wind turbine generators for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed along the permitted, but not yet constructed, Southwest Intertie Project – Northern Portion.” In order to supply energy markets across the western United States, MVE would need to use the transmission lines that contribute to providing a reliable energy grid in the western United States. The use, operation, and maintenance of the larger electrical system is outside the scope of the BLM’s evaluation of the project. See response to comment 11787-1 (see in Table A-3bb, Applicant's Interests and Objectives).
12985-3	Jerry Heimerdinger	• Magic Valley Energy is interested in this project to make money. • MVE often sells its projects after completion. • MVE would sell the electricity to the highest bidder ... Las Vegas & California ... not Idaho. ... MVE (LS Power) claims they deserve to construct a massive (largest in Idaho, near the largest in the nation) wind turbine project in the proposed area. MVE communicates that this project will be highly monetarily beneficial to our communities during the construction period and then lesser so during operation. This company is enthusiastic about providing renewable wind turbine energy by providing (500 megawatts?) of clean energy to Idaho to help our state achieve it's 2000 mw sustainable energy goal by 2045. MVE claims they can construct and operate this project with minimal impact to the environment. I agree that the growth of renewable energy is a priority for our energy demands. However, I feel that the facts and opinions I have included in my letter exceedingly contradicts MVE's claims of minimal impact to the environment.	The BLM follows applicable laws, regulations, and policies that guide the preparation of the EIS and inform the evaluation of proposals like the project. This includes making use of reliable existing data and resources to describe the existing conditions and inform the analysis of potential impacts. Throughout the preparation of the EIS, the BLM has obtained the relevant data and information needed to prepare the EIS. This information has come from project specific surveys, publications and analytical documents prepared by cooperating agencies and other reliable resources, and from information supplied by individuals and stakeholder groups.
13003-1	Lynden Osborne	I do not believe that public lands are the place for any wind farms, let alone this farm that greatly exceeds in size any similar facility to date in the United States. Magic Valley Energy and LS Power plan to make their debut on public lands with the largest wind farm in the country. In my opinion, wind generation projects should be built and maintained on private property. The individual property owner will generally steward his property in a manner that will protect and maintain its value and the value of properties in his neighborhood. He is motivated by ownership to ensure that a corporation which leases his land will ultimately do no harm. Corporations serve their shareholders and do not always make the best stewards or neighbors.	The BLM’s purpose and need for action arises from the BLM’s responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM’s decision.
8643-6	Steve Woods, Pam Woods	Furthermore, it is generally best practice to place the power source closest to the load for several reasons. One is efficiency. One is reduced cost of transmission lines. One is amount of real estate involved. Yet another that should be considered in today's environment is security from damage, be it intentional or unintentional (sabotage, wind, wildfires, earthquakes, etc).	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM’s purpose and need for action arises from the BLM’s responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief

Comment ID	Commenter	Public Comment	Response to Comment
			and specific statement that provides clarity to the proposal being evaluated. This structure is in line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyze impacts, and inform the BLM's decision.

Mitigation – EIS Appendix 4

Table A-3cc. Mitigation – EIS Appendix 4

Comment ID	Commenter	Public Comment	Response to Comment
1042-6	WildLands Defense	We strongly object to BLM's method of estimating "disturbance" -i.e. the land area bulldozed off, as it greatly fails to assess fragmentation and the totality of habitat loss and disturbance effects – including myriad forms of disturbance that do bot bulldoze the land. This is especially flawed for a huge wind project that sprawls over an immense landscape. With a project this gargantuan, with so many turbines and so much landscape-level disruption. Any "mitigation" and "minimization" measures must fully consider the entire area a dead zone and write-off for wildlife of many species except those that thrive in highly degraded, disturbed landscapes. The failure of BLM to admit that the impacts will not be able to be properly mitigated for migratory birds, Golden Eagles and other raptors, Sage-grouse, rare bats and a host of other native biota.	Impacts to wildlife from habitat fragmentation are analyzed in detail in EIS Section 3.18 (Wildlife). In addition to acres of temporary disturbance, quantitative impact indicators for habitat fragmentation considered in this section include miles of new and improved access roads and changes in road density, traffic volume, miles of temporary fence, the proximity of infrastructure to mapped wildlife linkages, and acres of noise and human activity in seasonal habitat (for mule deer and pronghorn). A number of mitigation measures would be implemented to minimize or avoid effects from habitat fragmentation, as well as or restoration of disturbed areas, as described throughout the impacts analyses in EIS Section 3.18. A robust mitigation framework for avian and bat species (including greater sage-grouse, golden eagle, other raptors, and special-status bats) that includes postconstruction fatality monitoring, adaptive management measures (including curtailment), and potential compensatory mitigation measures has been developed in accordance with the *USFWS Land Based Wind Energy Guidelines* (USFWS 2013) (see EIS Section 3.3 [Avian and Bat Species]). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
1042-12	WildLands Defense	[We request that alternatives that include the wind farm proponent purchasing a 308 sq. mile land area of private land as mitigation for this industrial wind development be analyzed, as well as posting a bond for the value of all properties harmfully impacted by the project].	As described in applicant-committed measure 164, MVE would be required to purchase a reclamation bond for the project prior to BLM issuance of NTP. The value of the bond will be determined by the BLM based on information provided in the Reclamation Cost Estimate prepared by MVE. Compensatory mitigation measures under consideration by the BLM include the purchase or acquisition of conservation lands to offset impacts, as appropriate. A complete list of mitigation measures, including mitigation frameworks, is provided in EIS Appendix 4 (Mitigation).
1042-28	WildLands Defense	Magic Valley Energy said the spinning blades could be stopped during periods when birds are passing through, in hopes of reducing bird deaths. [Well, we have a bridge on the East Coast to sell to BLM if the agency actually believes this will be followed by the wind company or will be effective. Given the great failure to conduct adequate project studies of migration and species actual presence beforehand as exhibited in the EIS, this is shown to be yet another uncertain promise likely to be broken and not followed].	MVE conducted 2 years of avian use surveys (WEST 2021a, 2023) to characterize temporal variation in avian use in the siting corridors. This data, along with information collected during the postconstruction avian and bat fatality monitoring (applicant-committed measure 150) would be evaluated by the TAC to determine whether a curtailment strategy is needed to reduce avian (or bat) fatalities (applicant-committed measures 157 and 158). This curtailment strategy would be tailored to periods or locations of peak fatality risk, as indicated by the data collected during preconstruction avian use surveys and postconstruction fatality monitoring. The curtailment strategy may be further informed by using local weather data and radar or sensors that can detect approaching birds, as described in applicant-committed measure 158 and the BBCS (Appendix M in MVE [2023]). As described in additional project-specific mitigation measure nn, MVE would be required to implement additional monitoring to assess the effectiveness of adaptive management measures implemented, including the curtailment strategy. MVE's compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring (applicant-committed measure 150 and additional project-specific mitigation measure oo). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
1042-29	WildLands Defense	Magic Valley Energy has developed a Bird and Bat Conservation Strategy to try and mitigate impacts to bird and bat populations. During the operating period, Magic Valley Energy will study bird collisions, and make adaptive strategies if necessary to reduce collisions, or to compensate by creating off-site habitat. [We strongly object to any reliance on the inadequate EIS information that does not even include thorough migration and on-the ground inventories for a broad range of species, and the poor EIS analysis where consultants often grasp at straws to try to minimize revealing the magnitude and scale of habitat losses and population effects].	The analysis in the EIS is based on a review of the best publicly available literature and information. MVE has conducted a number of additional project-specific baseline resource inventories, including bat acoustic monitoring and avian use, raptor nest, and sage-grouse lek surveys. Additional species-specific surveys would be required, for example, Additional project-specific mitigation measures q and r would require surveys for burrowing owls and short-eared owls. The analysis in EIS Chapter 3 (Affected Environment and Impacts) discloses the need for mitigation measures to avoid or minimize impacts to avian and bat populations from turbine collisions, as well as the potential that adaptive management measures (including curtailment) and compensatory mitigation (including studies of the geographic origin of fatalities) may be necessary to further reduce or offset the remaining impacts. A complete list of required mitigation measures is provided in EIS Appendix 4 (Mitigation).
10435-2	M. Chapman	Minidoka is a national treasure for many people. We must keep this as it was as a reminder so it doesn't happen again. [...] we should use some of the energy profits towards making the Minidoka site (or others in the West) a national park or more accessible and visible.	The Proposed Action, action alternatives, and the BLM's Preferred Alternative for the project would not include project elements within the historic boundary of Minidoka NHS. Action alternatives considered beyond MVE's Proposed Action would all work to further set back turbines from the Minidoka NHS area. Although lessened, visual impacts would remain under any action alternative, including—as presented in the EIS—those that could affect the experience and sense of place; see Sections 3.5 (Cultural Resources), 3.6.1 (Environmental Justice Communities), and 3.16 (Visual Resources). Impacts would be mitigated, as stated in EIS Section 3.5; although this mitigation would not remove the impacts that remain after all measures to avoid and minimize impacts are applied. Mitigation efforts for the remaining impacts are meant to retain and preserve resource values in alternate forms or through to return value through other means, such as retaining documentation of the impacted

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			resource for future knowledge and interpreting and educating on historic properties and area history such as at Minidoka. One goal of mitigation would be to preserve information and convey knowledge of Minidoka NHS and enhance awareness of its history and the history of the Japanese American community.
1050-3	Samuel DeGrey	The best course of action would be Alternative A, with Alternative's D & E being the next best. Furthermore, it would be prudent to designate all exluded portions of the reduced alternatives as a reserve, so that the project is not simply expanded later to the originally intended extent once infrustructure is in place.	The BLM is evaluating an application for a wind energy generation facility. Also see responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 12859-46 (see in Table A-3gg, Cumulative Effects).
1053-5	Susan Page	What is the plan to protect our animals? Protect the migration cycles of birds and animals?	See EIS Appendix 4 (Mitigation) for a complete list of measures that would be implemented to minimize or avoid impacts to wildlife, including migratory birds.
11211-5	Patrick Kelly; Western Watersheds Project	In addition, during reclamation of infrastructure projects, even properly planned and executed seeding efforts can and do fail. Therefore, seeding activities must be accompanied by a two-growing-season rest period from livestock grazing to enable the best chance for re-vegetation establishment and survival. The long-term planning process associated with a project as large as this one will allow for seed collection from the same ecological sites and for growth of sagebrush seedlings. Successful sagebrush seedings are notoriously difficult. However, containerized seedlings have a much higher establishment rate. Planting containerized seedlings requires an organizational infrastructure of seed collection, germination, growth and planting. BLM's Seeds of Success program has been working with institutional partners in the Great Basin. Those efforts could perhaps be expanded to incorporate reclamation of this Project, both interim and long term. Areas of the Project site that are designated habitat management areas for greater sage-grouse should be re-seeded with native species chosen to support greater sage-grouse.	See additional project-specific mitigation measure mm in EIS Appendix 4 (Mitigation). Also MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria (applicant-committed measures 163 and 164).
11224-3	Thomas Billington	When the aquifer is damaged, both by being blasted, by being redirected by crushed soils during blasting, and the pollution from the chemicals used to clear the ground and manage the dust, will BLM take liability for the damage?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11230-2	Lenny Schelling	Will Magic Valley Energy and LS Power be liable when the wells start drying up?	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources).
11271-1	Clare Josaitis	All the various Issues Analyzed in Brief depend heavily on mitigation to reduce impacts below significance. There is a huge number of issues 'hanging their hat' on the implementation of mitigation measures in order for any of the action alternatives to successfully not have a significant impact to the human environment or natural resources identified. This may possibly work, MAYBE and ONLY IF, the mitigation measure is actually implemented. And if implemented still there is no absolute guarantee of impact below significance. And who is going to monitor and ensure all these mitigation measures are implemented? Who is going to document it so that the public can check records that the mitigation measures have been implemented and whether they are truly working?	The mitigation measures described in EIS Appendix 4 (Mitigation) would be included in the terms and conditions of MVE's ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in additional project-specific mitigation measures nn and oo, MVE's compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring.
11315-4	Karen Atkinson	Mitigation: The Compensatory Mitigation Section (3.6.2.4.2) does not adequately provide for mitigation for the impacts on Alaska Natives.	See response to comment 12338-4 (see in Table A-3g, Cultural Resources and Native American Concerns). Also see response to comment 11315-5 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding Alaska Natives and EIS revisions regarding properly reflecting the different types of communities that were incarcerated at the Minidoka WRC.
11327-6	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	d) Mitigation Requirements Section 3.12.2.4 outlines compensatory mitigation measures that could be applied if applicant- committed measures do not eliminate impacts on big game species. We believe the language in this section is overly weak, vague, and does not provide us with confidence that mitigation measures would actually be applied. For example, the DEIS states, "The following compensatory mitigation measure could be applied if BLM determines it is warranted: Measure I: If post- construction carcass monitoring (mitigation measure VII), IDFG telemetry data, and/or annual winter counts indicate impacts to big game or avoidance of the area by big game, then consider the following…"(Emphasis added).22 The BLM should add more concrete language that requires the project applicant to take steps to implement effective mitigation measures that would make up for the functional loss of big game habitat in the project area. In its recently released draft Pronghorn Management Plan, IDFG outlined objectives and priorities it hopes to achieve over the next six years, including improving the quality of pronghorn population monitoring data to better estimate population size and understand population trends, collaborating with private landowners, land management agencies, and others to incorporate measures in land use and resource management plans that benefit pronghorn habitat, and increasing knowledge of pronghorn survival, habitat use, genetics, and other factors affecting pronghorn populations, movements, and migrations.23 The project applicant should commit to contributing significant financial resources towards these objectives if the project were to be approved, and the BLM should include this commitment in Section 3.12.2.4.	Both additional project-specific mitigation and compensatory mitigation were further detailed for the final EIS regarding big game. See EIS Appendix 4 (Mitigation) for more details.
11327-13	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	b) Compensatory Mitigation Additional mitigation options should be considered for this project, beyond solely relying on retrofitting of power lines to abate electrocution risk. Options should include use of non-toxic ammunition for hunting and removal of animal carcasses from highways, which could reduce Golden Eagle mortality from secondary lead poisoning and vehicle collisions, respectively 40,41,42. i) Carcass Removal Vehicle collisions are a reoccurring source of Golden Eagle deaths, as they are attracted to these high- risk	As described in EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), the USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines. Compensatory mitigation requirements would be re-evaluated every 5 years by the USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5), including a pole retrofit program. Additional measures may be

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		areas of food sources provided by roadkill carcasses 43,44. This accounts for an estimated 1% annual mortality in the western U.S.45 Lonsdorf et al. (2018) devised a methodology to estimate Golden Eagle vehicle collision rates based on eagle densities, road traffic volume, and animal carcass abundance and then used these predictions to analyze potential mitigation credits controlling for carcass number, traffic volume, and background carcass removals. Based on work in Wyoming, the authors emphasize the cost effectiveness and ease of implementation this strategy offers and propose it as an alternative to power pole retrofits. This mitigation strategy has already proven successful in connection with this project and should be a recognized mitigation option going forward. Multiple mitigation strategies should be pursued to ensure that mitigation benefits occur as close to the project area as possible. Thus, care needs to be taken to not entirely remove this potentially important food source or place them in an area where greater conflicts could arise. The disturbances caused by the project may cause displacement and behavioral changes amongst these apex predators/scavengers, further adding food scavenging challenges in a more fragmented landscape. Slater et al. (2022) recommend that roadkill be moved at least 12 meters from the road to increase eagle use and decrease flushing 4-fold relative to behavior observed at the road edge46. Because flushing from roadkill is believed to be the primary cause of eagle–vehicle strikes, informed roadkill management has the potential to reduce human-caused mortality of Golden Eagles. It is also worth noting that recent work by Millsap et al. (2022) found that starvation was a much higher source of Golden Eagle mortality, particularly for Y1 eagles, than previously believed47. ii) Lead Abatement Big game are plentiful at all times of the year in the area proposed for the Lava Ridge Wind Project. In regards to Golden Eagles (and Ferruginous Hawks48), winter is the time of greatest carcass availability for scavenging, especially as gut piles from hunting activity become available just as other food sources are becoming scarce. In groundbreaking work by Slabe et al. (2022), unexpectedly high frequencies of lead poisoning were detected in Golden Eagles, both chronic (47%) and acute (7-35%)49. Crandall et al. (2020) shared preliminary results with the Wyoming Golden Eagle Working Group of a non-lead ammunition distribution program in an area northwest of Laramie, Wyoming50. Their preliminary data suggested that non-lead ammunition programs are a successful and cost-effective form of compensatory mitigation to offset Golden Eagle mortalities in geographic areas with wind facilities. Approaches to estimating mitigation credits from lead abatement, both through providing ammunition free to hunters as well as gut pile removal, have been developed by Cochrane et al. (2015),51 who note that the main obstacle to evaluating lead mitigation and other potential actions is the low number of eagles predicted to be taken or actually taken at individual wind facilities, an issue that could be overcome through integrating data across many projects with a collaborative and coordinated research program.	identified by the USFWS during the eagle permitting process and will be described in their associated NEPA document.
11327-22	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	i) Curtailment The DEIS notes that a curtailment strategy would be developed in coordination with the USFWS, IDFG, OSC, and that the BLM and would define standard operating procedures for operation during different seasons (i.e., migratory periods) and different times of day. Curtailment of should not be focused on nesting season but year-round, especially given the concerningly high predicted mortality rates associated with all the alternatives and the additional proposed Tauraus Wind Project, located immediately northwest of the Lava Ridge Wind Project (would be similar in size and scale to the Lava Ridge Wind Project).	As described in EIS Section 3.3.3.2.2 (Eagles, Alternative B [Proposed Action]), "strategic curtailment procedures would focus on periods and locations of peak risk to birds and bats based on the results of postconstruction monitoring," which may or may not correspond to nesting or migratory periods. The curtailment strategy may be further informed by using local weather data and radar or sensors that can detect approaching birds, as described in applicant-committed measure 158 and the BBCS (Appendix M in MVE [2023]). As described in applicant-committed measure 159, MVE would be required to implement additional monitoring to assess the effectiveness of the curtailment strategy and other adaptive management measures implemented. MVE's compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring (additional project-specific mitigation measures nn and oo). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
11336-1	Nathan Schutte	1. Mitigation. The word mitigation is used extensively and there is a mitigation section in Volume 3, appendix 4. My main concern is that mitigation is very expensive and can be a serious challenge to provide, especially for this size of project. Where and how will the mitigation be provided? How can this amount of mitigation be guaranteed? I wonder with this large amount of mitigation; if is it even possible to provide?	The mitigation measures described in EIS Appendix 4 (Mitigation) would be included in the terms and stipulations of MVE's ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in additional project-specific mitigation measure oo, MVE's compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring.
11481-2	Idaho Wool Growers Association	Alternatives B through E would reduce the AUMs on the allotments. These alternatives propose improving infrastructure through a number of allotments. Currently, there is limited and worn-out infrastructure through the allotments. IWGA would hope that improvement in infrastructure through roads and water troughs would help grazing availability in the area, therefore ideally maintaining the same amount of AUM's on the allotments.	See responses to comments 11204-13 and 11204-19 (see in Table A-3p, Livestock Grazing).
11491-10	Dean Dimond, Jennie Bateman	The BLM has not provided a tangible analysis of impacts on their jurisdictional authorities and the costs of public access maintenance and hazard mitigation. No tangible mention is made as to the adverse effects on human health and the customs, culture and livability within the counties, tribal and private lands within the project area.	See EIS Section 3.6 (Environmental Justice and Socioeconomics) for a detailed analysis of impacts to local and regional communities, as well as impacts to Tribal communities and dispersed environmental justice populations. Human health is addressed in EIS Appendix 3 (Issues Analyzed in Brief), AIB-10 through AIB-14. As described in EIS Section 3.14.1 (Traffic Patterns), The BLM does not have the authority to approve or deny the use of the public roads managed by ITD and the local highway districts for the project. MVE would be responsible for obtaining required approvals from ITD or the local highway districts and would comply with the terms and conditions of those approvals. MVE has also committed to restoring public roads to a condition that is as good as or better than their condition when the construction period begins (see applicant-committed measure 38).
11496-9	Danielle Gunn	Further, permanent post project acreage loss as written in the DEIS is not acceptable. Acreage should be restored to pre-project numbers following the project.	See response to comment 11204-13 (see in Table A-3p, Livestock Grazing).

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11527-3	Richard Stover; State of Idaho	The State's expectation is that compensatory mitigation will be offered. The DEIS outlines a compensatory mitigation measure ("Measure I") that "may be warranted" for big game. Compensatory mitigation, including adaptive monitoring and management, must be designed to fully offset adverse Project effects based on habitat acreage and must consider the loss of habitat quantity, quality, and connectivity. Compensatory mitigation measures must define effectiveness metrics for successful implementation and completion that would ideally improve the Owinza big game winter range conditions to benefit the affected pronghorn and mule deer populations.	See response to comment 11527-15 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11527-8	Richard Stover; State of Idaho	During FEIS analyses and Mitigation Plan development, the BLM's primary focus for sage-grouse credit projects to offset adverse Project effects (i.e., debits) should be in areas designated as Priority Habitat Management Area (PHMA) and Important Habitat Management Area (IHMA). This should preferably occur within the local fine-scale area and adjacent local-fine scale areas where adverse Project effects will occur. If this cannot be implemented, analysis and implementation of credit projects must occur in the same Idaho Conservation Area where adverse effects will occur. If that is not feasible, credit projects must be focused in PHMA and IHMA of other Idaho Conservation Areas as a last resort and in coordination with the State of Idaho. For example, direct and indirect adverse Project effects on sage-grouse are anticipated in the Craters of the Moon and Timmerman Hills Fine Scale Areas within the Desert Conservation Area. Therefore, the FEIS must first analyze compensatory mitigation and develop a Mitigation Plan for the PHMA and IHMA of these two fine scale areas and adjacent fine scale areas. Next, the FEIS must analyze options for compensatory mitigation in other fine scale areas that are not adjacent to the Project area but within the Desert Conservation Area. Lastly, BLM must analyze options in other Idaho Conservation Areas. The BLM must analyze all compensatory mitigation mechanisms potentially available (e.g., In- Lieu Fee, Conservation Banks, and Permittee Responsible Mitigation) and not limit analysis to just one mechanism. The FEIS must also analyze a range of potential compensatory mitigation options and activities to offset the Project's estimated adverse effects on sage-grouse. Examples of compensatory mitigation activities could include the following: (1) tall structure removal (inactive or unnecessary powerlines, communication towers, etc.), (2) wet meadow restoration, (3) juniper and invasive species removal, (4) sagebrush reestablishment, (5) desirable forb and grass reestablishment, (6) disturbed site rehabilitation, and (7) existing habitat preservation (e.g., conservation easements, conservation rights of way, leases, etc.) The State of Idaho's HQT is based on a no-net-loss concept for compensatory mitigation. HQT analyses provided to the BLM for the DEIS considered and estimated direct and indirect Project effects on sage-grouse habitat quality and quantity calculated in terms of functional acres. The State recommends that all anticipated adverse Project effects on sage-grouse habitat functional acres (debits) be adequately and effectively replaced/offset with credits as estimated with the HQT. Other principles that must be analyzed in the FEIS and incorporated in the Mitigation Plan and ROD include the following (see Executive Order 2022-03, which contains the "Idaho Sage-Steppe Mitigation Principles" document as an Appendix): • Effectiveness/Durability: performance standards should be in place to maintain expected benefits. Performance standards are an important component of mitigation plans for demonstrating that intended benefits are meeting established standards in a qualitative, repeatable way. • Duration: the length of time the Project adversely affects sage-grouse should match the length of time the mitigation benefits sage-grouse. • Timeliness: compensatory mitigation should be in place to benefit affected sage-grouse populations before or at the same time adverse effects accrue to sage-grouse. If compensatory mitigation initiates after adverse effects accrue, an accounting of lag times between impact and offset should be conducted. • Risk and Uncertainty: tools or approaches must be in place to effectively limit the risk of failed mitigation if projects do not deliver anticipated benefits. Such tools may include reserve accounts, phased release of credits, compliance and enforcement mechanisms, and legal/financial protections. • Tracking and Transparency: mitigation projects should demonstrate to regulators, stakeholders, and the interested public that benefits are real and lasting. • Additionality: Mitigation should create an additional benefit to sage-grouse.	Since publication of the draft EIS, the BLM has continued to work with IDFG and MVE to develop mitigation for greater sage-grouse. This is reflected in EIS Section 3.3.4 (Greater Sage-Grouse) and in the Additional Project-Specific Mitigation and Compensatory Mitigation sections, as well as the Mitigation Framework for Greater Sage-Grouse section, in EIS Appendix 4 (Mitigation).
11527-9	Richard Stover; State of Idaho	The Project is expected to affect migratory birds and bats, particularly migratory tree bats (silver- haired bat, hoary bat) and raptors, each of which have relatively long lifespans and low reproductive output. Many adverse population effects of wind energy projects on migratory birds and bats can be effectively avoided or minimized with measures. Examples of such measures include turbine siting, operational curtailment, and deterrents. Approaches to effectively optimally site wind energy infrastructure and avoid or minimize turbine- associated mortality continue to be developed and improved. For example, the DEIS states that acoustic deterrent technology has current limitations but is improving. A variety of new technologies that could expand the effectiveness of deterrents to reduce bat mortality are under development and might become available during the Project's lifetime. Comments on DEIS Multiple migratory bird- and bat-related avoidance, minimization, and compensatory mitigation measures are described in the DEIS for the Preferred Alternatives (p. 3-54), including the following: (1) Mitigation Measures j-s, (2) Postconstruction mortality monitoring for a minimum of 2 years, (3) Potential adaptive management including curtailment, and (4) Compensatory mitigation. For birds and bats to be adequately considered and conserved, each of these measures must be analyzed in the FEIS. The Project applicant intends to consider compensatory mitigation for bats under a scenario of any action alternative (p. 3-57). However, as stated in the DEIS, the species anticipated to be most affected by the Project would be hoary and silver-haired bats. These species are tree-roosting bats that are not reliant on caves/mines, and their populations have not been affected by white-nose syndrome. Therefore, the proposed compensatory mitigation measures VII ("Contribute funds to survey abandoned mines for bats and, if used, close with bat-friendly gates") and VIII ("Contribute funds to assist with research on white nose syndrome and vaccination against white nose syndrome") would not offset adverse Project effects on these migratory tree-roosting bats. The Project applicant intends to implement compensatory mitigation for migratory birds adversely affected by the Project. However,	Since publication of the draft EIS, the BLM has continued to work with IDFG to develop mitigation for avian and bat species. This is reflected in Section 3.3.1 (Bat Populations and Roosting Habitat), Section 3.3.2 (Avian Populations), and the Additional Project-Specific Mitigation and Compensatory Mitigation sections in EIS Appendix 4 (Mitigation).

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		Measures IX and X address only two species of birds, and Measure XI offers only to “consider” measures for other species. Recommendations for FEIS and ROD The FEIS and ROD must analyze mechanisms for adaptive monitoring and management to improve avoidance and minimization techniques as methods and technologies to conserve migratory birds and bats are likely to advance throughout the Project’s 34-year lifespan. For example, the effectiveness of acoustic deterrent technology might improve during the Project’s lifetime. Avoidance, minimization, and compensatory mitigation measures must be designed specifically for affected migratory birds and bats (hoary and silver-haired bats). Robust monitoring and adaptive management components must focus on avoidance and minimization by supporting effective combinations of deterrents and curtailment as part of Project operations. Adaptive management could include funding scientific projects to inform and improve bird and bat conservation relative to the Project and for Idaho (e.g., studies and testing of acoustic deterrent technology, etc.). Compensatory mitigation must consider on-site risks and seek to improve conditions for Project- affected migratory bird and bat populations, including prioritizing the enhancement of habitat adjacent to the Project area. The FEIS must clearly describe and analyze only the required mitigation or voluntary mitigation activities to which the Project applicant is committed to fulfill. Proposed Mitigation Measures IX, X and XI might benefit special-status avian populations affected by the Project. Within the FEIS and ROD, the proposed Measure XI (“Consider measures for other special-status species and other species of concern, as determined through postconstruction monitoring”) must include a framework for quantifying compensatory mitigation based on functional acreages of lost and fragmented habitat and Project-caused mortality. Compensatory mitigation requirements should be habitat-based and quantified with the best available data, postconstruction monitoring, and adaptive management. The implementation of compensatory mitigation must be prioritized in proximity to the Project area to benefit populations affected by Project construction and operations.	
11527-12	Richard Stover; State of Idaho	The Project will negatively impact local grazing practices well beyond its 34-year lifespan in the absence of comprehensive mitigation measures and a clear reclamation plan. Depending on the selected alternative, up to nine federal grazing allotments will experience animal unit month (AUM) reductions due to the construction of wind turbines, power substations, operation and maintenance facilities, battery energy storage units, transmission lines, cable junction boxes, and communication facilities. Road construction and related project work disturbances will result in the spread of invasive weeds, increased fire frequency, and dust generation that creates unpalatable forage. This could cause additional unaccounted for AUM reductions in any affected allotment. The applicant has indicated that compensatory mitigation in the form of alternative feed sources will be provided to affected permittees during Project construction (2-years) to offset the loss of AUMs. However, the applicant has not indicated that compensatory mitigation will be offered during the operation (30-years), decommissioning (2-years), and final reclamation (~5-years) phases of the Project despite the fact that these phases will experience “a temporary reduction in AUMs.” The applicant has committed to additional measures intended to reduce the loss of AUMs; however, the State of Idaho is concerned about the efficacy of such measures. Moreover, the State of Idaho is concerned about the cumulative socioeconomic impact from reduced AUMs over the course of the Project’s 34-years and 5-years for regrowth of forage post-reclamation. Because AUM reductions over the Project’s lifetime will result in significant impacts to affected permittees, the State of Idaho has a vested interest in the success of the applicant’s reclamation plan and the restoration of native vegetation post-Project. The State of Idaho is concerned that the goals and objectives of the reclamation plan could lead to confusion. For example, the reclamation plan makes statements like, “Reclamation success is defined by the re-establishment of vegetation and topography compared to conditions in the surrounding area at the time of reclamation” (p. 3- 358). However, if non-native species dominate the Project area, the reclamation plan should not try to restore pre-Project conditions. The reclamation plan also states that the applicant “will not be responsible for meeting reclamation success criteria in the event reclaimed areas are impacted by non-Project related disturbances like grazing, public recreation, or non-Project caused fires” (p. E-4).The State of Idaho requests assurances that the applicant will fulfill its reclamation commitments. Any alternative chosen must be contingent upon Project modifications that outline comprehensive compensatory mitigation measures along with a clear and committed reclamation plan that can ensure the current value of rangeland practices are not diminished over time. Recommendations for FEIS and ROD The FEIS must include additional compensatory measures for all affected permittees through all phases of the Project in which AUM reductions will occur to avoid strain on such an integral component of the state and local economy. While assessing the logistics of the compensatory mitigation, the State of Idaho encourages careful attention to the location and feasibility of alternate feed locations, costs associated with additional hauling requirements, availability of supplemental feed in an already strained local economy, and using the most current data to assign dollar amounts to AUMs. The goal of the reclamation plan should maximize the site's ecological potential by restoring native grasses, forbs, and shrubs (not non-native species).	See response to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1). See also Section 3.15.1 for the affected environment and impacts analysis for Native Upland Vegetation Communities; Figure 3.15-1 shows the proportion of the analysis area dominated by both native and nonnative vegetation.
11527-15	Richard Stover; State of Idaho	The State of Idaho’s technical comments on the DEIS and recommendations for the FEIS and ROD are therefore intended to promote the following: • Avoid disrupting wildlife migrations during Project construction, operation, and decommissioning. • Avoid disrupting big game migration routes with infrastructure or activities that would impede access to seasonal ranges, including crucial winter range needed by big game during harsh winter conditions. • Avoid and minimize loss and fragmentation of wildlife habitat, particularly sagebrush and riparian habitat. • Avoid and minimize adverse effects on wildlife-based recreation, including hunting and trapping. • Offset unavoidable, residual adverse Project effects with adequate and effective compensatory mitigation. FEIS analyses must quantify acreages of unavoidable habitat loss and implement compensatory mitigation to enhance habitat quantity, quality, and connectivity for affected wildlife populations (e.g., through habitat restoration, enhancement, and protection from additional future loss). Compensatory mitigation should be	In response to public comments on the draft EIS, the BLM worked with IDFG to draft additional project-specific mitigation and compensatory mitigation for big game. These edits are reflected in EIS Appendix 4 (Mitigation).

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		habitat-based, designed with a priority to enhance and protect wildlife habitat and populations within the Project area and adjacent landscapes affected by the Project, and include adaptive monitoring and management to ensure mitigation effectiveness.	
11534-9	Matt Arnold, William Eubanks	BLM should consider alternatives that condition authorization on operational limits that further reduce impacts to avian and bat species. These should include, for example, restrictions on the Project's cut-in speed. Studies have found that even modest increases to a wind project's cut-in speed significantly reduces bat mortalities, with only "marginal annual power loss." See, e.g., Edward B. Arnett et al., Altering Turbine Speed Reduces Bat Mortality at Wind-Energy Facilities, 9 FRONTIERS IN ECOLOGY 209, 2019, 214 (2011) ("Relatively small changes to wind- turbine operation resulted in nightly reductions in bat mortality, ranging from 44% to 93%, with marginal annual power loss (≤ 1% of total annual output). Our findings suggest that increasing turbine cut-in speeds at wind facilities in areas of conservation concern during times when active bats may be at particular risk from turbines could mitigate this detrimental aspect of wind-energy generation.").5 The modest reduction in power output (e.g., ≤ 1% of the annual total) associated with conditioning authorization on higher cut-in speeds makes this alternative both "economically practical" and "feasible." 43 C.F.R. § 46.420(b). Moreover, it represents a mid-range alternative that squarely meets BLM's purpose and need. Id.; see also DEIS at 1-1 (defining the purpose as "respond[ing] to MVE's application for a ROW grant to construct, operate and maintain, and decommission a wind energy facility on public lands . . ."; defining the need as "manag[ing] public lands for multiple use and sustained yield"). Indeed, federal agencies routinely analyze cut-in speed alternatives when evaluating wind-energy projects under NEPA, precisely because this is an extremely valuable tool for disproportionately reducing wildlife impacts without jeopardizing a wind-energy project's ultimate viability. See, e.g., U.S. Fish & Wildlife Serv., Final Environmental Impact Statement for Proposed Habitat Conservation Plan and Incidental Take Permit for the Fowler Ridge Wind Farm in Benton County, Indiana (Dec. 2013), https://bit.ly/41J1fH5 (analyzing in detail a 3.5 m/s cut-in speed "feathered" alternative, a 5.0 m/s cut-in speed alternative, and a 6.5 m/s cut-in speed alternative; ultimately selecting the 5.0 m/s cut-in speed alternative).6 Where, as here, a proposed mid-range alternative entails only minimal economic losses in exchange for significant benefits to the ecosystem the agency is tasked with managing, BLM may not lawfully avoid analyzing that alternative under NEPA. See, e.g., Union Neighbors United, Inc. v. Jewell, 831 F.3d 564, 577 (D.C. Cir. 2016) (requiring agency to analyze "a realistic mid-range alternative with a cut-in speed that would take materially fewer bats than [Project proponent]'s proposal while allowing the project to go forward" because "[a]lthough an agency need not examine an infinite number of alternatives in infinite detail, examining a reasonable alternative that could potentially take fewer bats than [the existing alternatives] would inform both the public and the decisionmaker by sharply defining the issues and providing a clear basis for choice among options" (internal quotation marks and citations omitted)).7	Required mitigation for all action alternatives include feathering turbine blades when wind speeds are below the manufacturer's cut-in speed for the turbine (see applicant-committed measure 160). Feathering turbine blades when wind speeds are above the manufacturer's cut-in speed is known as curtailment, which is one of the adaptive management measures that may be implemented if avian or bat fatalities exceed acceptable thresholds, as determined by the TAC (see additional measures y and nn). Raising the cut-in speed for all turbines is considered "blanket curtailment." Curtailment strategies that target peak periods or locations of peak risk using information from postconstruction fatality monitoring, local weather data, or sensors that detect approaching birds and bats are preferred over blanket curtailment because they effectively reduce avian and bat fatalities while minimizing the financial impact of reduced power output from the facility. Curtailment strategies and other adaptive management measures for avian and bat species are discussed in detail in EIS Section 3.3 (Avian and Bat Species); additional details are in the BBCS (Appendix M in MVE [2023]).
11534-10	Matt Arnold, William Eubanks	BLM's consideration of alternatives fails to consider other protective wildlife measures that are known to reduce fatalities to avian species at little relative cost to a project proponent. The DEIS asserts in the context of the sage grouse that for "all action alternatives," "MVE would bury powerlines where feasible"; "[i]f this is not feasible, MVE would ensure that high-risk segments are marked with collision-diverter devices or as latest science indicates." DEIS at 3-118. But this highlights several deficiencies in BLM's NEPA analysis. First, with respect to the sage grouse, there is no analysis—let alone an explanation or enumerated criteria—for what will be deemed "high-risk segments" warranting underground powerlines or, at minimum, the installation of collision-diverter devices to deter birds from flying into above-ground lines. Nor is it clear what constitutes a "high-risk segment" warranting action to protect the sage grouse, something that BLM or the self-interested Project proponent will be determining only after issuance of BLM's final decision. Failing to disclose these essential details of the Project—and ensuring that they will be based on a rigorous application of modern scientific principles—clearly fail to comply with NEPA's requirements. Second, with respect to avian species more broadly (many of which are protected from death and injury by the Migratory Bird Treaty Act ("MBTA") in the absence of express authorization of the U.S. Fish and Wildlife Service to "take" these members of these species), the DEIS fails to consider any action alternatives in which the dozens of miles of above-ground Project-related transmission lines (or even a substantial majority of such lines) would be marked with collision-diverter devices. Yet it is well-established, including in guidance from the federal agency with relevant statutory and subject-matter expertise on migratory birds, that collision- flight diverters can drastically reduce avian mortality from transmission lines. Cf. U.S. Fish & Wildlife Serv., Region 6 Guidance for Minimizing Effects from Power Line Projects Within the Whooping Crane Migration Corridor (Feb. 4, 2010), https://bit.ly/3UPNhB6 (citing studies for the proposition that collision-diverter devices can reduce avian mortality by 50% to 80%, and recommending that all transmission lines near "documented high use areas" should be buried underground or at least marked with collision-diverter devices).8 Accordingly, as with cut-in speed alternatives to reduce bat mortality, BLM must consider collision-diverter device alternatives that can feasibly and economically reduce fatalities of federally protected birds, in order to satisfy BLM's duty to rigorously evaluate reasonable alternatives. In sum, BLM's DEIS fails to consider and analyze a reasonable range of action alternatives by failing to consider any operational variations related to turbine cut-in speeds, burying of transmission lines, and transmission line collision-diverter devices. A supplemental DEIS is necessary to examine these additional, feasible alternatives in detail, and to allow the public to meaningfully comment on those additional options for operating the Project.	The USFWS does not currently have a formal mechanism for permitting incidental take of migratory birds at wind energy facilities. However, the USFWS has developed land-based wind energy guidelines (USFWS 2012) to provide wind developers with a system to evaluate potential impacts on species of concern and to avoid costly mitigation or potential criminal liabilities and fines (Rose 2015). These guidelines recommend a tiered study approach, beginning with a preliminary site evaluation (Tier 1) and site characterization (Tier 2), followed by preconstruction wildlife baseline studies (Tier 3), and where appropriate, postconstruction monitoring (Tiers 4 and 5). MVE has conducted Tier 1 through 3 studies, has a draft BBCS (Appendix M in MVE [2023]) in accordance with USFWS (2012) guidelines, and has committed to a minimum of 2 years of postconstruction monitoring surveys to meet the Tier 4 study requirements. Tier 4 studies would be used to determine if the fatality rates and potential for population-level effects predicted from the Tier 3 studies are accurate, and to provide a basis for determining if adaptive management measures need to be implemented to reduce avian fatalities. Under all action alternatives, all aboveground transmission lines would be designed and constructed in accordance with APLIC guidelines for reducing avian collision risk; see applicant-committed measure 30. Additionally, diverters would be required on all guy wires (BLM-required measure l).
11535-31	Steven Andersen	The DEIS fails to acknowledge and consider important mitigation and conservation measures for individual species. For example, notwithstanding that the DEIS does not provide any specific location for the turbines generally,122 but it also does not address placement of facilities and infrastructure away from home ranges and	As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), "Although the exact location of infrastructure and activities within the siting corridors is unknown at this time, evaluating the entirety of the siting corridors for potential impacts provides flexibility to site the project components where

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		foraging areas. Wind turbines and associated electrical facilities should be placed a minimum of 2 miles from, for example, ferruginous hawk home ranges and foraging distances—this would certainly not be limited to just ferruginous hawks. There is no indication the DEIS considered these types of mitigation measures.	necessary (from both resources and engineering perspectives) within the siting corridors. The project's final design and engineering would be completed after the BLM has issued a ROD and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. The project's final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer. This EIS identifies and considers effects to resources present within the siting corridors, allowing for identification of areas with fewer impacts or specific resource trade-offs. This identification of resource constraints within the siting corridors provides flexibility for the project design to adjust through site-specific engineering for the final layout. The action alternatives consider different configurations of the siting corridors to avoid or minimize potential effects. These configurations are described by alternative below." A number of species-specific avoidance buffers for turbine placement would be implemented; see, for example, applicant-committed measure 138, which includes a 2-mile avoidance buffer for eagle nests and 1-mile avoidance buffer for ferruginous hawk nests. Avoidance buffers would also be implemented for habitat features that are important to sensitive wildlife, such as the irrigation canals (see applicant-committed measure 138). See EIS Appendix 4 (Mitigation) for a complete list of required mitigation measures.
11535-41	Steven Andersen	The proposed turbines are the largest onshore wind turbines ever to be built and operated. As the DEIS notes, the turbines are up to 740 feet tall, with a max rotor diameter of 560 feet.150 Thus, the numbers presented and relied upon in the DEIS do not, and cannot, account for the unauthorized eagle take from this type of project, without further detailed analysis. The DEIS essentially requests that MVE be allowed to experiment with the mortality rate of eagles after-the-fact. Specifically, the DEIS states that there is a variation in risk which is "likely influenced by topography, prey resource availability, and eagle behavior…Implementation of curtailment at turbines determined to be at higher risk for collision by eagles (as identified through monitoring) may reduce the risk of eagle mortality from turbine strikes." 151 In other words, the request is that the EIS be approved so that MVE can then monitor the eagles more closely and determine the mortality rate. The obligation in the DEIS is to provide the plans for conservation and mitigation beforehand, not after-the-fact.	More details regarding eagle monitoring, conservation, and mitigation plans are typically developed through the ITP process with the USFWS, which is separate from the EIS process.
11535-43	Steven Andersen	Furthermore, the DEIS proposes insufficient and/or ineffective mitigation efforts. The DEIS admittedly does not have a plan if maintenance and "other activities" cannot be conducted outside of the nesting season, and states only that "MVE would coordinate with the USFWS."159 Given the documented and admitted negative impact the project will have on eagles, the speculative claim that MVE will coordinate with USFWS is not a "hard look" into what mitigation efforts are necessary now, not in the future. Also, the DEIS proposes to construct "[a]vian diverters," and states MVE will "equip aboveground facilities…with structures or devices that discourage perching or nesting of raptors and ravens."160 However, it then highlights the flaw with such approach in stating that, although "[detector-based systems] have shown promising results for eagles[,] these systems involved small sets of turbines and thus cannot be extrapolated to estimate facility-wide fatality reductions."161 The proposed project does not involve "small sets of turbines," and therefore, the proposed curtailment efforts asserted are baseless.	See response to comment 11535-41 (see in Table A-3cc, Mitigation – EIS Appendix 4). As described in EIS Section 3.3.3.1 (Eagles, Affected Environment), the nearest active eagle nest identified during MVE's raptor nest surveys (WEST 2020, 2021b) is more than 2 miles from the nearest siting corridors, and only two other active eagle nests were identified within 10 miles of the siting corridors. This section also notes the lack of preferred nesting substrates for eagles in the siting corridors. Applicant-committed measure 140 requires MVE to restrict non-emergency maintenance or other activities to outside the eagle nesting season (January 1 to August 31) if these activities would occur within 1 mile of an occupied golden eagle nest, and would adhere to the USFWS (2007) guidelines for any occupied bald eagle nest. Since there are currently no active eagle nests in the siting corridors, it is not possible to develop site-specific mitigation requirements at this time. As stated in EIS Section 3.3.3.2.2 (Eagles, Alternative B [Proposed Action]), "Avian diverters would be installed and maintained on all guy wires/lines of all existing or any new temporary met towers, and where guy wires are necessary, appropriate guy guards would be installed at the base of the guy wires (applicant-committed measure 142)" and "When practicable for collector lines, MVE would use tubular structures to reduce the ability of birds to perch and to reduce risk of collision (applicant-committed measure 143). MVE would equip aboveground facilities (buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting of raptors and ravens (BLM-required measure K). These measures would minimize the likelihood of eagles perching or nesting on project structures, which may reduce the potential for electrocution or collision with the structures." Detector-based systems, as used in the EIS, refers to turbine curtailment strategies that use sensors to detect approaching eagles and automatically curtail turbines, which is unrelated to the use of avian diverters or perching/nesting deterrents.
11535-44	Steven Andersen	Finally, the DEIS admits that based on the projected fatality rates, which are grossly underestimated, the "total cumulative annual permitted and unauthorized take under all action alternatives is likely to contribute to ongoing golden eagle population declines if not offset by compensatory mitigation[.]" 162 Absolutely no compensatory mitigation is proposed in the DEIS. As just one example, it has been found that mitigation of turbine-associated mortality occurring in other parts of the western United States could have local benefits, i.e., local benefits on the subject area in Idaho.163 However, the DEIS makes no mention of how the project will or could work with other wind farm projects as a form of compensatory mitigation to offset eagle mortalities. The mitigation efforts have been sorely overlooked in the DEIS.	As described in EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), "The Eagle Permit Rule (50 CFR 22.80(c)(1)(i)) requires compensatory mitigation for 'any permit authorizing take that would exceed the applicable eagle management unit take limits . . . [which] must ensure the preservation of the affected eagle species by reducing another form of ongoing mortality by an amount equal to or greater than the unavoidable mortality, or increasing the eagle population by a greater amount.' The USFWS will be responsible for making a decision on MVE's eagle ITP application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines. Compensatory mitigation requirements would be re-evaluated every 5 years by the USFWS and could involve a number of options for the first 5-year permit administrative period (i.e., years 1 through 5), including a pole retrofit program. Additional measures may be identified by the USFWS during the eagle permitting process and will be described in the associated NEPA document."
11535-53	Steven Andersen	There was also no mitigation outlined for these communities should the project proceed, and Alternative A is not selected. The DEIS discusses the "irretrievable effects to low-income and minority populations" and then in the following section provides that there will be no compensatory mitigation due to applicant-committed measures. "Mitigation measures outlined or analyzed in an environmental assessment, environmental impact statement, or record of decision, whenever feasible, should address significant and adverse environmental effects of proposed Federal actions on minority communities and low-income communities."	As described in EIS Section 3.1.2.4 (Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity), "The irretrievable commitment of a resource means that, although committed, the resource can be renewed or restored following the action" while "The irreversible commitment of a resource means that, once committed, the resource is permanently lost to other potential uses." Thus, these terms are related to the duration of impacts rather than their severity. EIS Section 3.6.1.2.2 (Environmental Justice Communities, Alternative B [Proposed Action]) describes a number of mitigation measures that would be implemented to minimize or avoid impacts to low-income and minority populations, most of which are short-term impacts associated with construction and decommissioning. With the implementation of the measures, it is not anticipated that there would be residual impacts to low-income and minority populations that warrant the

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			implementation of compensatory mitigation measures. The EIS acknowledges the potential for residual impacts to other dispersed environmental justice communities (i.e., the Japanese American community and Native American Tribes) and identifies potential compensatory mitigation measures for these impacts (see EIS Section 3.6.1.4.1 [Compensatory Mitigation, Dispersed Environmental Justice Populations]).
11535-57	Steven Andersen	The DEIS also does not conduct any formal appraisals or rely on valuations by a qualified appraiser, nor does it address mitigation payments to landowners whose property value will be affected by this project. The government is charging up to $1,000,000 per acre to wind farms for leasing its land. 199 Yet, a farmer whose property abuts that land and has the structure towering over his or her property is not being offered any remuneration for its impacts (impacts so vast they had to be studied in an 1800-page EIS). Many of our clients tell us they will no longer be able to operate their farms if the project is approved. Several are second or third generation farmers, who have invested into Idaho land.200 The DEIS should have addressed economic mitigation for losses due to impacts on land values and income for surrounding farms (due to negative effects on dairy cows, beef cows, crops, and workforce). See also Recreation comments.	See responses to comments 13006-35 and 11535-56 (see in Table A-3h, Environmental Justice and Socioeconomics).
11535-63	Steven Andersen	The DEIS asserts a confidence that through mitigation efforts, “there would be no residual effects to the risk of human-caused or natural-caused wildfire ignition and spread or wildfire response and suppression efforts that would warrant compensatory mitigation.” However, this sense of confidence gives undue weight to mitigation efforts even though there can be no guarantee that mitigation measures would be implemented or ultimately effective.210 As provided for below in comments related to aviation, wildfire mitigation would be stunted by the presence of 400 plus turbines.	The mitigation measures described in EIS Appendix 4 (Mitigation) would be included in the terms and stipulations of MVE’s ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in additional project-specific mitigation measures nn and oo, MVE’s compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring. EIS Section 3.7.1.2 (Wildfire Ignition, Spread, Response, and Suppression, Impacts) discloses the potential for the alternatives to interfere with aerial fire suppression efforts and describes a number of measures that would be implemented to minimize or avoid impacts to fire response and suppression. This section also notes the potential for the increased fragmentation of the landscape to break up fuel continuity, potentially reducing the potential for large fire spread, and increased access to fire responders in the siting corridors from new access road construction. Since these measures would effectively reduce the potential impacts to fire response and suppression, compensatory mitigation is not warranted.
11535-89	Steven Andersen	Additionally, the DEIS wrongfully assumes that many of these issues can be regulated through mitigation efforts. However, these mitigation efforts often rely on action by specific individuals such as driving with caution towards animals and maintaining a strict speed limit. These mitigation efforts are merely wishful thinking without including consequences for violation or institutional oversight. Likewise, many of the other mitigation efforts listed are ambiguous and depend solely on the judgment of the project managers who have incentives that stand directly in opposition to preservation of wildlife.	The mitigation measures described in EIS Appendix 4 (Mitigation) would be included in the terms and stipulations of MVE’s ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in additional project-specific mitigation measures nn and oo, MVE’s compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring. While some mitigation measures allow for discretion by MVE or its construction contractors, these measures specify what additional steps must be taken if avoidance is not possible, such as development of site-specific mitigation strategies and coordination with the BLM, the TAC, and other agencies.
11536-9	Richard Llewellyn	However, any merits of that conclusion must be beyond the scope of this EIS. What must be established here are the scientifically valid expectations that impacts can be mitigated by restoration efforts, as the same process is relied upon in more pristine areas. If the EIS fails to meet this requirement in a project of this magnitude, as it does, the public cannot expect the agency to meet it elsewhere.	See response to comment 11563-3 (see in Table A-3x, Vegetation).
11541-1	Jonathan van Harmelen	The Bureau of Land Management should cooperate with the Japanese American community to negotiate a settlement over the location of the Lave Ridge Wind Farm Project. The Minidoka Historic Site is one of a few federally recognized sites related to the Japanese American experience, and is one of three camp sites (out of ten) preserved by the National Parks Service. Very few historic landmarks capture the tragedy of the wartime incarceration of Japanese Americans like the camps themselves, and Minidoka is important both as a site of remembrance for camp survivors and their descendants and a place for Americans to learn about the history of racism in the U.S. Few doubt the need for the Lava Ridge Project, along with other clean energy projects, in combatting climate change. Yet these projects should not damage the historical integrity of national landmarks like the Minidoka Historic Site. As camp survivors have previously stated, the construction of the turbines would generate pollution and could potentially damage the historic site. Most of all, it would eliminate the sense of isolation that defined the incarceration experience and traumatized those confined. The federal government intentionally placed the camps on federal lands located in rural areas to avoid contact with nearby communities, and now eighty years later the legacy of this policy now resurfaces with the BLM's decision to construct the Lava Ridge Project next to the camp site. If the BLM respects the Japanese American community as a stakeholder in the site selection process for the Lava Ridge Project, it will listen to the community's desires and cooperate with the selection process. If it does so, the Lava Ridge Project can serve as a model for cooperation between the federal government and local communities with regards to future clean energy projects.	See analysis presented in Sections 3.5.5.2, 3.6.1.2, and 3.19. See response to comment 9080-46 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11554-17	Raul Labrador; Idaho Attorney General’s Office	The agency’s recommended alternatives do not mitigate the harm. They also would “have irreversible impacts on mule deer and pronghorn from human activities (e.g., vehicle use, construction equipment, maintenance activities), wind turbine operation (e.g. noise, vibration, shadow flicker caused by moving blades) and ground disturbance that would remove or alter habitat.” DEIS at 3-485. As noted above, Idaho maintains the right and responsibility to “preserve, protect, and perpetuate” its wild game populations and to “provide continued supplies of such wildlife for hunting, fishing and trapping.” Idaho Code § 36-103(a). MVE’s devastation to Idaho wild game is a clear invasion of Idaho’s legal rights.	The State of Idaho is a cooperating agency on the EIS. The BLM worked with IDFG to draft mitigation for the project. The draft EIS did not identify an agency-preferred alternative or make any recommendations as to which alternative should be selected.

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11585-5	Preservation Idaho	Protections of historic sites such as the Milner-Gooding Canal and the Wilson Butte Cave, a National Register site, are not being considered and there are many other caves in the area that will be impacted along with the natural flora and fauna that have made this area their home for hundreds/thousands of years. Adverse impacts on historic sites and activities such as sheep trailing will also be permanent. These are all part of Idaho's history and their preservation is both appropriate and crucial to the overall management of Idaho resources.	See response to comment 11534-18 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding the EIS's address of cultural resources, including historic sites and historic properties. See response to comment 11915-1 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding avoiding, minimizing, or mitigating adverse effects to important cultural resources, including the Wilson Butte Cave historic property, and caves and buttes of cultural significance to Tribes and others. Also see response to comment 11198-2 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding identification and assessment of effects to historic properties prior to project construction. See also response to comment 11860-9 (see in Table A-3p, Livestock Grazing).
11598-21	Idaho Conservation League	Light pollution We appreciate the light pollution mitigation measures included in the DEIS. However, if this project is to move forward, the BLM should include robust dark sky monitoring during the construction and initial operation phase of the project to verify that the project is indeed not measurably impacting dark skies, especially at Craters of the Moon NP. For mitigation, the developer could help support voluntary efforts for additional light shielding in and around interested communities and Dark Sky designated areas.	Because avoidance and minimization measures would largely reduce impacts so that changes in brightness added from the project would not be perceptible to the human eye (see EIS Section 3.16.2 [Night Skies]) except near the horizon, monitoring and compensatory mitigation is not warranted. MVE is already minimizing light used for the project to the extent allowed by law (FAA regulations).
11598-27	Idaho Conservation League	Based on the public comments regarding visual effects to the Minidoka National Historic Site, we recommend that the BLM consider adding a viewshed buffer around Minidoka based on the Visual Resource Management classification system as part of a Resource Management Plan amendment. The exact distance could be based on discussions between members of the Japanese American community, the BLM and Magic Valley Energy/LS Power. There may also be sites of cultural significance to Shoshone-Bannock and Shoshone-Paiute tribal members that could be addressed through similar means.	For more information about the project-specific interim VRM process, see response to comment 11535-149 (see in Table A-3y, Visual Resources). See response to comment 9080-46 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11618-3	Bif Brigman	What y'all are missing is what about the harm that cannot be mitigated? What about the things that compensatory mitigation can't address for the harm that is being inflicted or the thing being taken? You expect people to comment on mitigation when no amount of money can replace what is being proposed here. We know you don't want us to see your grandma. But if we did, how much would you want? Your process is flawed and has been flawed since the beginning. Why did BLM say no to an area south of Twin Falls because of Sage grouse but thought it is just fine to impact the resources of one of the rare National Landmarks for Japanese Americans in the whole nation. And the only one in the state of Idaho.	The BLM has not yet issued a decision regarding the project. All alternatives represent a trade-off between resources and uses and it is not possible, nor required, that all adverse effects of the alternatives be eliminated or mitigated. The purpose of the EIS is to disclose each alternative's impacts on the human and natural environment, including those impacts that cannot be completely avoided or minimized. Where residual impacts would remain after the implementation of mitigation measures, compensatory mitigation has been proposed, in accordance with the BLM mitigation framework.
11782-5	Ken Fitch	There is mention of compensatory mitigation. However, there is no adequate compensation for the abridgment and disruption of the experience of place with its specific environment central to the cultural importance of this place. As a NPS site (and also on BLM land), it is the location itself with all its features, including its climate, that is being set aside for protection on a specific piece of land, not in a photograph of video of such or an exhibit. The compensatory mitigation would appear as an especially cynical gesture to Japanese Americans, aware that compensation is nowhere near actually adequate to redress deep impacts of the removal and cultural shredding experienced for the events over 60 years ago This was the case with the $20,000 compensation offered several decades ago, although the acknowledgment was a step toward healing, but now to inflict another action of cultural disrespect followed by an attempt for compensation as mitigation would reopen wounds.	The analysis presented in Section 3.6.1 (Environmental Justice Communities) acknowledges how any adverse effects to Minidoka NHS and Minidoka WRC would have the potential to cause psychological harm to members of the Japanese American community by perpetuating and reinforcing existing feelings of anger, injustice, distrust, and being dishonored within the community, and by potentially diminishing the ability of the community to benefit from healing rituals and practices centered around Minidoka NHS. Additional information has been added to Section 3.6.1.4 (Compensatory Mitigation) to convey the sentiments of the Japanese American and Minidoka-connected communities toward compensatory mitigation for project-related impacts. Also see response to comment 11383-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
11788-1	Representative Jack Nelsen	My largest overriding concern is the fact that LS Power has done absolutely nothing in the way of mitigating the effects of the Lava Ridge Wind Project's effects on the surrounding communities. Other than some feel good community gatherings, they have not met with county commissioners, highway districts, and other governmental officials of the communities affected by the project. That in and of itself is concerning to think a project of this magnitude has tried to circumnavigate the core of the communities and the concerns of its citizens.	EIS Section 3.6 (Environmental Justice and Socioeconomics) describes mitigation measures that would be implemented to minimize or avoid impacts to local communities and the regional economy. A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation). MVE and the BLM have coordinated directly with stakeholders such as grazing allotees and the Japanese American community throughout the development of the EIS. The BLM conducted a robust public involvement process for the EIS, which includes ongoing coordination with local and state government agencies and officials. While a number of mitigation measures have been incorporated into the EIS to address concerns raised by these agencies and officials, MVE is responsible for obtaining all other required federal, state, and local permits and approvals, as described in EIS Appendix 2 (Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies).
11860-6	Shauna Robinson	The DEIS information on the cultural and natural importance of playas to the high desert in the proposed project area is inadequate. Playas are seasonal water sources that support migrating wildlife in the spring. Birds often use them as resting spots during their spring migration. In fact, in early April while driving east of Wilson Butte, my husband and I noticed a playa with numerous waterfowl, such as Scaups and Green-tailed Teals, on it. We also observed mule deer and pronghorn in the area and it would be safe to assume they, too, took advantage of the playa's water. Geologically, playas are quite interesting, created when prehistoric lakes dried up. Additionally, these shallow basins or ephemeral ponds can be useful to climate research, as they hold information about both past and present climates (USGS). Culturally, indigenous people used playas as sources of water in the spring and as a source of food. The Native Americans harvested tiny fairy shrimp, which are commonly found in the waters of the playa, and after the playa dries up, the shrimp go dormant until seasonal waters come again. The Lava Ridge project area has many playas of varying sizes, all important to birds, insects, amphibians, large and small animals, and some vegetation. Many of these water features are at risk because of potential construction of wind turbines and the great amount of ground disturbance. Especially concerning is how reclamation attempts may be difficult or impossible for damaged playas (3-492), which becomes a permanent loss of water sources for wildlife. The BLM should provide for extra protection of these vital desert features, through buffer zones or avoidance.	The EIS discloses the importance of playas in the siting corridors for wildlife, including migratory birds (see Section 3.3.2.1 [Avian Populations, Affected Environment]), pollinators (see Section 3.11.1.1 [Pollinators, Affected Environment]), and amphibians (see Section 3.18.3.1 [Amphibians, Affected Environment]). A number of mitigation measures would be implemented to minimize or avoid impacts to wetlands and other surface water, and site-specific mitigation plans would be developed where impacts cannot be avoided (see applicant-committed measures 120, 124, 129, 132, 136, and 138). These measures include a 100-foot avoidance buffer for all wetlands, streams, and riparian areas. This avoidance buffer would be increased to 330 feet anywhere amphibian breeding activity is confirmed during preconstruction surveys (see additional project-specific measure cc). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).

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11871-106	WildLands Defense	At M-62: The Adaptive Management is deficient, and is not based on adequate and honest analysis of avian, bat and other biota Impacts. The Report refers to Thresholds: Levels of mortality for a particular bird or bat species of concern that could result in population-level impacts as determined through consultation between MVE, USFWS, and BLM based on best available science; or ”Mass casualty” events where more than 10 fatalities are recorded at a turbine during a single search. If the above levels of mortality are exceeded, postconstruction monitoring data will be further evaluated to determine if the probable cause of the mortality is associated with collision with wind turbine blades or possible other causes (e.g., predation), evaluate if the primary species …”. “ species] impacted are of conservation concern, and whether feasible mitigation options are available to reduce impacts. Conservation benefits realized from existing mitigation commitments from MVE as outlined in Appendices T (Eagle Conservation Plan) and U (Greater Sage Grouse Mitigation Plan) will also be considered in the evaluation of impacts for their benefit to species of concern beyond those targeted for mitigation.	The BBCS is Appendix M in MVE (2023). Readers should refer to EIS Appendix 4 (Mitigation) for a complete list of required mitigation measures, which include a number of additional mitigation measures for birds. The measures from the draft EIS have been revised and expanded for the final EIS to clarify the adaptive management and compensatory mitigation measures that would be required. As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B [Proposed Action]), “It is impossible to accurately predict the fatality rate for the Lava Ridge Wind Project because preconstruction use is not correlated with postconstruction fatality rates (WEST 2011).” Due in part to the uncertainty in quantifying fatality rates prior to construction, mitigation measures include postconstruction avian fatality monitoring. The TAC would use data from this fatality monitoring to assess avian fatality rates and determine which adaptive management measures need to be implemented to reduce fatalities (if any). Additional monitoring would be required to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation. This strategy is consistent with the USFWS’s land-based wind energy guidelines (USFWS 2012).
11873-16	Mary Schwartz, Frank Schwartz	18. The addition of roads, fences, structures, facilities and areas of exclusion as well as traffic, human activity, noise and vibration, relocated water, emf, etc. will influence the movement of livestock in the wind farm area, during the construction, operation, decommissioning and, as applicable, the post-decommissioning periods. These modified livestock travel patterns could result in areas of heavier use as well as areas of inadequate use of the allotments/pastures. If the BLM approves any of this windfarm proposal, BLM should provide all permittees a waiver of any liability associated with the changes in livestock use of the areas. Permittees should not be responsible for any future impacts associated with livestock use in these areas that result from BLM's decision to move forward with this wind farm project.	See response to comment 11204-13 (see in Table A-3p, Livestock Grazing).
11873-17	Mary Schwartz, Frank Schwartz	19. The wind energy company (MVE or successor) should be required to provide money annually to Counties, the BLM and the U.S. Treasury in the amount of lost grazing revenues associated with any reduced AUMs, temporary and permanent, including the period following the final wind farm decommissioning and area restoration.	See response to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11886-8	Sandra Eto	1. The DEIS describes the impacts from Alternative B and includes applicant-committed measures that are part of project design, mitigation required by BLM policy, and additional project-specific mitigation. It appears project-specific mitigation includes avoidance and minimization activities that are incorporated into construction-related specifications, field best management practices and the like. Once these three types of mitigation are taken into consideration, the residual impacts from Alternative B are then described. If you look at Appendix 4, Table 4-3, however, it appears that the third type of “additional project-specific mitigation” is not automatically considered for application to Alternative B and some discretion is allowed on whether or not they are applied to Alternative B. BLM would then decide whether additional compensatory mitigation would be required as part of Alternative B. This type of mitigation would be applied to offset residual impacts that would prohibit or inhibit BLM from complying with its own laws and policies, or impact important, scarce, or sensitive resources. The final EIS would then provide a description of the residual impacts warranting compensatory mitigation and the type and amount of compensatory mitigation that would be required.	See response to comment 11886-10 (see in Table A-3cc, Mitigation – EIS Appendix 4) regarding the implementation of mitigation measures under Alternative B. As stated in additional measure a, “Where applicant-committed measures (Table App4-2) are written only for specified project phases (i.e., construction, operation, or decommissioning), the BLM would require that MVE implement them regardless of the project phase if those measures would reduce impacts to resources. For measures regarding pre-clearance, the BLM would determine what would require pre-clearance during maintenance and decommissioning” (see Table App4-4 in EIS Appendix 4 [Mitigation]). A description of how the additional measures from Table App4-4 would further minimize or avoid impacts is provided after the list of measures in the Alternative B with Additional Measures sections throughout EIS Chapter 3 (Affected Environment and Impacts).
11886-9	Sandra Eto	2. For Alternatives C, D, and E, the impacts, application of mitigation measures and description of residual impacts assume all four types of mitigation measures will be fully applied to these alternatives automatically. Residual impacts will be those that remain after applicant- committed measures, mitigation required by BLM policy, additional project-specific mitigation, and compensatory mitigation have been applied. No interpolation of impacts would need to be pieced together by the reader. The description of impacts from Alternatives C, D, and E would be completely disclosed with no interpolation or interpretation necessary.	As described in the response to comment 11886-10 (see in Table A-3cc, Mitigation – EIS Appendix 4), the mitigation measures listed in EIS Appendix 4 (Mitigation) would be required for all action alternatives.
11886-10	Sandra Eto	3. Looking at Appendix 4, Table App4-1. Types of Mitigation (p. App4-1), it appears I did not unpack the DEIS description very well. However, my main point, which can be seen in the Table, is that the way in which Alternative B’s impacts are handled are not the same as for those of Alternatives C, D, and E. It takes a lot more thought and work to ascertain what the impacts are from Alternative B, and what the mitigated impacts are after applying up to three types of mitigation, two of which cannot yet be assumed to apply to Alternative B. When you are not comparing apples to apples, it makes it difficult to evaluate the alternatives’ comparative merits, or even understand what the residual impacts are for the proposed alternative. It also should be noted that measures from the historic properties management plan are not even included in this DEIS.	The mitigation measures listed in EIS Appendix 4 (Mitigation) would be required under all action alternatives, including Alternative B. As stated throughout the impact analyses in EIS Chapter 3 (Affected Environment and Impacts), "In addition to applicant-committed measures and mitigation required by BLM policy (see Tables App4-2 and App4-3 in EIS Appendix 4) that would be implemented under Alternative B, the BLM would apply additional measures (see Table App4-4 in EIS Appendix 4) to minimize impacts under Alternative B. Although these measures are not included as part of MVE’s Proposed Action (Alternative B), these measures would be included in the terms and conditions of the ROW permit if a ROW is granted and Alternative B is selected.” EIS Section 3.5.3 (Cultural Resources, Programmatic Agreement) and EIS Appendix 8 (Cultural Resources Programmatic Agreement) describe the process for developing HPTPs when adverse effects to historic properties cannot be entirely avoided, as well as the potential measures that would be included in these plans.
11978-6	Magic Valley Energy, LLC	Section 3.1.2.1 – Analysis Approach to Mitigation 7. The DEIS States: “The project would be subject to applicant-committed measures, mitigation required by BLM policy, and additional project-specific mitigation as described in Section 2.3.4 (Avoidance and Minimization) and DEIS Appendix 4 (Mitigation). The DEIS impact analyses assume the project would include implementation of these measures and disclose remaining impacts. To compensate for remaining impacts, the BLM may also consider compensatory mitigation.” a. MVE Comment: Throughout the DEIS, BLM notes the need to add additional project- specific mitigation measures. The FEIS should note that the applicant-committed measures will be made mandatory through the Record of Decision. Because these measures will be mandatory, the BLM should recognize that there are situations where these applicant-committed measures will obviate the need for additional project-specific mitigation measures. See, for example, comment 10 below addressing how applicant- committed measures render additional BLM mitigation	The additional project-specific mitigation measures listed in Table App4-4 in EIS Appendix 4 (Mitigation) were developed to address impacts that remain after the implementation of all applicant-committed measures. Any redundancy between additional-project specific mitigation measures and applicant-committed measures are a result of the need for more stringent mitigation measures than proposed by MVE or because of the need to clarify ambiguous language in measures proposed by MVE.

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		measures unnecessary. Other instances where additional mitigation measures are not warranted are listed in subsequent MVE comments under the appropriate section, including additional measures listed in the analyses for avian and bat species, amphibians, pollinators and insects, and water and wetlands.	
11978-10	Magic Valley Energy, LLC	Section 3.2.1.2.2 and Section 3.2.2.2.2– Air Quality for Alternative B with Additional Measures during Construction and Operation 10. MVE Comment: As previously commented in this comment letter, the DEIS states that additional measures would be applied to the Project to further minimize impact to air quality. The Project's annual construction emissions are given for Alternative B, and the DEIS states that these activities would not exceed federal or state ambient air quality standards. Further, operational emissions for Alternative B in the DEIS Table 3.2-6 are shown to represent less than 1% of any total existing emission rate listed for each county (CO2, NOX, SOX, PM10, PM2.5, VOC, and HAPs). Given that estimated operations emissions are a fraction of the estimated construction emissions, which have already been determined not to exceed air quality standards and to be minor, it logically follows that operational emissions impacts would be far less than the minor impacts determined for construction emissions. Further, Alternatives C, D, and E would all have lower emissions than Alternative B throughout the life of the Project. Moreover, the applicant-committed measures for reducing emissions, such as water spray, which can reduce dust by 75% on unpaved roads with little water spray2, would further reduce these already low-impact emission rates. Based on this information, requirements for additional BLM measures would have diminished value in their implementation or would be redundant with applicant-committed measures and would therefore not be warranted: • Measure b: Tier 4 compliant generators would be used when available during construction to reduce nitrogen oxide (NOx) emissions. • Measure c: MVE and its contractors would control dust to the extent that off-site transport of visible dust plumes is eliminated. Water would be used as a dust control method during the life of the project to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas, along major highways and interstates, and near cultural and historic resources. (This measure adds to applicant-committed measure 111.) • Measure e: Construction activities may be limited or scaled back to reduce off-site transport where practice water application would be ineffective at controlling dust. Operations that can be controlled or that produce minor or very little dust would continue as normal/scheduled. Section 3.2.2.2– Air Quality Operational Impacts	Additional project-specific mitigation are measures needed to further avoid or minimize impacts so that compensatory mitigation is not needed. The BLM feels these measures are needed.
11978-20	Magic Valley Energy, LLC	18. MVE Comment: When holistically looking at the bat analysis through the MVE requested changes presented within this Section (i.e., use of minimum bat fatality range, use of applicant-committed measures, no 30-year maximum fatality estimate, use of new data) the Project's impacts to bat species are unlikely to be moderate to high under Alternative B. Instead, MVE anticipates that Alternative B would likely have a low impact to bat species, and Alternatives C, D, and E would be expected to have even lower impacts, as the Project alternatives decrease in turbine count and are sited farther away from potential foraging habitat (i.e., canals). Based on these conclusions (i.e., that impacts to bat species would be low), the BLM-required additional measures and compensatory mitigation measures presented in the DEIS would not be warranted. This view is consistent with Section 3.3.1.3 - Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity, where the DEIS states: "…these effects would not be irreversible because they would be unlikely to result in a trend toward listing under the ESA or a loss of population viability." Therefore, the requirements for additional measures and compensatory mitigation measures should be removed from the FEIS, since this does not follow the BLM's mitigation principles, which call for mitigation measures to be commensurate with the level of impact to the environmental resource.	The conclusion in EIS Section 3.3.1.3 (Bat Populations and Roosting Habitat, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity) that effects of the action alternatives would not be irreversible because they would be unlikely to result in a trend toward federal listing under the ESA or a loss of population viability is based on the conclusion that the facility has been properly sited and that mitigation measures, including adaptive management, would be effective at minimizing bat fatalities. However, as noted in the analysis assumptions in EIS Section 3.3.1 (Bat Populations and Roosting Habitat), preconstruction bat acoustic activity does not appear to be correlated with observed bat fatality rates following construction. EIS Section 3.3.1.1 (Bat Populations and Roosting Habitat, Affected Environment) discloses the lack of accurate estimates of bat population sizes and trends, and EIS Section 3.3.1.1.3 (Bat Populations and Roosting Habitat, Existing and Future Trends and Actions) discusses how the continued spread of WNS introduces further uncertainty in predicting the magnitude of impacts to some bat populations in the long-term. While postconstruction bat fatality monitoring will provide an opportunity to assess actual bat fatality rates and determine which adaptive management measures need to be implemented to reduce bat fatalities (if any), it will be necessary to continue evaluating new data and literature on bat populations and the impacts of wind energy development on those populations over the 30-year operation phase. Thus, while the data currently available do not indicate that compensatory mitigation will be needed for bats, the need for such mitigation may arise as conditions change in the future. The final EIS includes new and revised mitigation measures that describe the TAC's role in evaluating the results of postconstruction fatality monitoring data and using the best available science and technology to recommend appropriate adaptive management and compensatory mitigation measures.
11978-25	Magic Valley Energy, LLC	21. MVE Comment: When holistically looking at the avian analysis through the MVE requested changes presented within this Section (i.e., inclusion of minimum fatality range, no non-eagle avian species impacts) the Project's impacts to these avian species are unlikely to be moderately to highly impacted by the Project under Alternative B. Instead, MVE anticipates that Alternative B would likely have a low impact to non-eagle avian species, and Alternatives C, D, and E would be expected to have even lower impacts, as the Project alternatives decrease in turbine count and are sited further away from potential avian use features (i.e., canals). Based on these conclusions (i.e., that impacts to species would be low), the BLM-required additional measures and compensatory mitigation measures presented in the DEIS would not be warranted. This view is consistent with Section 3.3.2.3 - Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity, where the DEIS states: "…these effects would not be irreversible because they would be unlikely to result in a trend toward listing under the ESA or a loss of population viability." Therefore, the requirements for additional measures and compensatory mitigation measures should be removed from the FEIS, since this does not follow the BLM's mitigation principles, which call for mitigation measures to be commensurate with the level of impact to the environmental resource.	See response to comment 11978-20 (see in Table A-3cc, Mitigation – EIS Appendix 4). As with bats, there is uncertainty in predicting avian fatality rates and the future status of avian populations in the analysis area (see EIS Section 3.3.2 [Avian Populations]). Therefore, the same postconstruction fatality monitoring requirements apply to birds, and the TAC will be responsible for evaluating the monitoring results of and using the best available science and technology to recommend appropriate adaptive management and compensatory mitigation measures, when deemed appropriate.
11978-48	Magic Valley Energy, LLC	45. Appendix 4- Table App4-3, E "Place infrastructure in already disturbed locations where the habitat has not been fully restored." (BLM 2015 RDF #54) MVE Comment: While MVE will co-locate Project infrastructure within already disturbed locations to the maximum extent feasible, e.g., by using existing roads and co-locating linear	If the project is authorized by the BLM, applicable greater sage-grouse ARMPA (2015) RDFs will be included as terms and conditions of MVE's ROW grant. The RDFs included in the EIS were those that could be successfully applied as criteria informing the design of action alternatives or implemented as terms and conditions.

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		infrastructure in existing linear corridors as feasible, the Project area does not offer a sufficient area of already disturbed locations where the habitat has not been fully restored to site any of the action alternatives under review. Thus, this RDF is not applicable due to the site-specific conditions of the Project (RDF variation criterion #1), and MVE requests that this measure be removed. MVE recommends that BLM add a statement to Section 3.3.4.2.2 in the third paragraph after Table 3.3- 14 to specify that BLM 2015 RDF #54 is not applicable due to the rationale described in this comment.	
11978-49	Magic Valley Energy, LLC	46. Appendix 4- Table App4-3, F “Co-locate linear facilities within one mile of existing linear facilities.” (BLM 2015 RDF #56) MVE Comment: MVE will co-locate linear facilities within one mile of existing linear facilities as feasible; however, the Project spans a large area, and all action alternatives under review will require siting some linear facilities more than one mile from existing linear facilities. Thus, this RDF is not applicable due to the site-specific conditions of the Project (RDF variation criterion #1), and MVE requests that this measure be removed. MVE recommends that BLM modify the text in Section 3.3.4.2.2 in the third paragraph after Table 3.3-14 to specify that BLM 2015 RDF #56 is not applicable due to the rationale described in this comment.	See response to comment 11978-48 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-50	Magic Valley Energy, LLC	47. Appendix 4- Table App4-3, J “Place new utility developments (power lines, pipelines, etc.) and transportation routes in existing utility or transportation corridors.” (BLM 2015 RDF #62) MVE Comment: MVE will co-locate its new utility developments and transportation routes within existing utility or transportation corridors as feasible; however, the Project spans a large area, and all action alternatives under review will require siting some utility developments and transportation routes outside of existing utility or transportation corridors. Thus, this RDF is not applicable since there are not enough existing utility or transportation corridors within the Project siting corridors to co-locate all Project utility and transportation components such as collector lines and roads within existing corridors. MVE requests that the measure be removed, and MVE recommends that BLM modify the text in Section 3.3.4.2.2 in the third paragraph after Table 3.3- 14 to specify that BLM 2015 RDF #62 is not applicable due to the rationale described in this comment.	See response to comment 11978-48 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-51	Magic Valley Energy, LLC	49. Appendix 4- Table App4-3, M “BLM would not issue ROW for new energy development roads, unless for a temporary use consistent with all other terms and conditions in the ARMPA (BLM 2015).” (BLM 2015 RDF #90) MVE Comment: RDF #90 in BLM 2015 reads, “Do not issue ROWs or SUAs to counties on newly constructed energy or mineral development roads, unless for a temporary use consistent with all other terms and conditions included in this document.” (emphasis added) This RDF does not prohibit BLM issuing ROWs for energy development roads; it only prohibits counties from being issued ROWs over energy development roads. This prohibition may be to prevent the additional traffic and maintenance impacts that could result from converting well- regulated energy and mineral development roads to county roads where the road users might have less regard for BLM standards. It appears that this RDF was not intended to be applied to energy development permittees such as MVE; thus, MVE requests that this measure be deleted.	See response to comment 11978-48 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-52	Magic Valley Energy, LLC	50. Appendix 4- Table App4-4, a “Where applicant-committed measures (Table App4-2) are written only for specified project phases (i.e., construction, operation, or decommissioning), the BLM would require that MVE implement them regardless of the project phase if those measures would reduce impacts to resources, where feasible. For measures regarding pre-clearance, the BLM would determine what would require pre-clearance during maintenance and decommissioning.” MVE Comment: As previously mentioned in the comment letter, this additional measure is not warranted as the applicant-committed mitigation measures detailed for each phase are specifically tailored towards avoiding and minimizing impacts efficiently and effectively for that particular phase of the Project life. BLM’s 2005 Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States (the “Wind Energy PEIS”) supports the strategy of applying purposeful measures under differing phases, as shown in the following excerpts20: • Construction. “All control and mitigation measures established for the project in the POD and the resource-specific management plans that are part of the POD shall be maintained and implemented throughout the construction phase, as appropriate.” • Operation. “All control and mitigation measures established for the project in the POD and the resource-specific management plans that are part of the POD shall be maintained and implemented throughout the operational phase, as appropriate. These control and mitigation measures shall be reviewed and revised, as needed, to address changing conditions or requirements at the site, throughout the operational phase. This adaptive management approach would help ensure the impacts from operations are kept to a minimum." • Decommissioning. “All management plans, BMPs, and stipulations developed for the construction phase shall be applied to similar activities during the decommissioning phase.” As detailed above, the Wind Energy PEIS clearly views phase-specific mitigation measures and BMPs as appropriate for wind energy projects on BLM-administered lands. Moreover, requiring phase-tailored measures to apply across all project phases could result in unintended consequences or absurd results, such as prohibiting maintenance activities during operation without first conducting clearance surveys for sensitive wildlife and plant species which could result in significant delays in necessary equipment maintenance, or forcing excessive water use by requiring unpaved Project roads to be watered during operations. Thus, for consistency with BLM policy established in the Wind Energy PEIS and to avoid unintended consequences and absurd results, MVE requests that BLM delete this measure in the FEIS.	The comment misinterprets the meaning of BLM (2015), which specifically states that “all control and mitigation measures established for the project in MVE (2023) and the resource-specific management plans that are part of MVE (2023) shall be maintained and implemented throughout the operational phase, as appropriate” (BLM 2015:2-23 and “All management plans, BMPs, and stipulations developed for the construction phase shall be applied to similar activities during the decommissioning phase” (BLM 2015:2-24). Thus, additional measure a is consistent with the recommended BMPs in BLM (2015). As stated in additional measure a, construction measures would only be required during operations and decommissioning if those measures would reduce impacts to resources, and only where feasible. The measure also specifically states that the BLM would have discretion to determine whether preconstruction clearance measures are warranted for operations or decommissioning activities. This is consistent with the recommendation in BLM (2015) that [construction] control and mitigation measures be reviewed and revised, as needed, to address changing conditions or requirements at the site, and would ensure this measure does not have “unintended consequences” or “absurd results.” Therefore, no revisions are necessary.
11978-53	Magic Valley Energy, LLC	51. Appendix 4- Table App4-4, b Tier 4 compliant generators would be used when available during construction to reduce nitrogen oxide (NOx) emissions.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 10 in this comment letter. [see MVE pdf letter, comment 10 on page 7] In addition, MVE notes that a requirement for Tier 4 generators is not warranted since the analysis in the DEIS	The BLM’s best practices include use of Tier 4 compliant generators when available. This measure would be included in MVE’s ROW grant, if the project authorized.

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		demonstrates no concerns regarding NOX emissions or ambient pollutant concentrations. As such, MVE requests that this measure be removed from the FEIS on either premise.	
11978-54	Magic Valley Energy, LLC	52. Appendix 4- Table App4-4, c “MVE and its contractors would control dust to the extent that off-site transport of visible dust plumes is eliminated. Water would be used as a dust control method during the life of the project to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas, along major highways and interstates, and near cultural and historic resources. (This measure adds to applicant-committed measure 111.)” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 10 in this comment letter [see MVE pdf letter, comment 10 on page 7]; however, if this measure will not be removed, the following comment applies: In the interest of conserving water, MVE requests that BLM revise this measure to include additional dust suppression techniques beyond water spray that are listed in Appendix O of the POD, including stabilization with gravel/aggregate and treatment with dust palliative products. The revised measure would read as follows: “MVE and its contractors would control dust to the extent that off-site transport of visible dust plumes is eliminated. Dust control methods, including water, surface stabilization with gravel/aggregate, or dust palliatives such as magnesium chloride (or other palliatives approved by BLM), will be used throughout the life of the project to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas, along major highways and interstates, and near cultural and historic resources. (This measure adds to applicant-committed measure 111.)”	Measures in Table App4-4 are additional to measures in Tables App4-2 and App4-3. The measures in Table App4-4 do not necessarily replace measures in Tables App4-2 and App4-3, they may modify and improve upon them.
11978-55	Magic Valley Energy, LLC	53. Appendix 4- Table App4-4, e “Construction activities may be limited or scaled back to reduce off-site transport where practice water application would be ineffective at controlling dust. Operations that can be controlled or that produce minor or very little dust would continue as normal/scheduled.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 10 in this comment letter. [see MVE pdf letter, comment 10 on page 7]	See response to comment 11978-78 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-56	Magic Valley Energy, LLC	54. Appendix 4- Table App4-4, j Turbines would not be placed within 0.25 mile of known bat roosts. Other infrastructure within that buffer would be minimized. MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter [see MVE pdf letter, comment 18 on page 13]. In addition, WEST surveys and historical data show no known bat roosts within 0.25 of a turbine for any alternative. As such, MVE requests that this measure be removed from the FEIS on either premise.	As described in EIS Section 3.3.1.2.2 (Bat Populations and Roosting Habitat, Alternative B [Proposed Action]), “Roosting has been documented at the lava crater near NABat station 89781-NE in the siting corridors and could be disturbed under Alternative B.” Given the increased potential for bat collisions with operational turbines in the vicinity of this roost site, the BLM has included additional measure n as a means of proactively reducing impacts to bats from the project. As described in the response to comment 11978-20 (see in Table A-3cc, Mitigation – EIS Appendix 4), the conclusion that impacts to bats are not expected to result in a trend toward ESA listing or loss of population viability are based on the implementation of all mitigation measures, including additional measure n. Therefore, no revisions are necessary.
11978-57	Magic Valley Energy, LLC	55. Appendix 4- Table App4-4, k “Phase construction by 1) concentrating work in a small percentage of the project area during the breeding season, and 2) spreading work over multiple years to only incrementally impact birds in a given area/landscape over time.” MVE Comment: MVE requests that BLM remove this measure since all applicable seasonal restrictions and nest buffers for avian species are already addressed in detail in other sections of the DEIS, including DEIS Section 3.3 for sage grouse and POD Appendices M, P, and T for other avian species. This measure k only adds ambiguity about how seasonal restrictions will be implemented and raises questions regarding how MVE would comply with the measure (what defines concentration of work? what defines a small percentage? How many years? What type of landscape?). Additionally, this measure does not seem to be backed by scientific research (i.e., would artificially prolonging construction and dispersing construction activity in the Project area over multiple years actually reduce impacts to bird populations relative to more concentrated construction over a shorter duration?)	See response to comment 11978-78 (see in Table A-3cc, Mitigation – EIS Appendix 4). Added “to the extent feasible” to this measure. Species-specific measures also provide additional details.
11978-58	Magic Valley Energy, LLC	56. Appendix 4- Table App4-4, m “MVE would include methods targeting burrowing owls in preconstruction surveys. Methods for avian use and nest surveys have not included these methods and therefore nests may go undetected.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter. [see MVE pdf letter, comment 21 on page 19]	As described in EIS Section 3.3.2.1.2 (Avian Populations, Species Analyzed in Detail), “Ten burrowing owls were recorded during the first year of avian use surveys (WEST 2021a), though actual burrowing owl use is likely to be higher because surveys were not designed to detect the species.” Additionally, the western burrowing owl is a BLM sensitive species and is afforded protection under the MBTA. If preconstruction surveys do not include methods that target western burrowing owls, construction activities could result in violations of the MBTA and impacts that would be inconsistent with BLM direction for management of sensitive species, as well as the BLM and USFWS’s MOU implementing EO 13186 (see EIS Section 3.3.2.1 [Avian Populations, Affected Environment]). Therefore, no revisions are necessary.
11978-59	Magic Valley Energy, LLC	57. Appendix 4- Table App4-4, n “Apply the following to postconstruction avian and bat fatality monitoring. a. The timing of surveys should coincide with times when bats are active in the area, or if data are limited, surveys should occur year-round. b. For fatality monitoring, select wind turbines at random or via a systematic random approach. c. Establish a search plot at least ½ the height of the wind turbine with a minimum plot width of at least 120 meters from the turbine. d. Define, using GPS, the searchable area and identify the different visibility classes within each plot. e. Delineate transect lines, within the plot, in most situations, no further than 6 m apart, but this may vary from 3–10 meters, depending on ground cover.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 and comment 21 in this comment letter. [see MVE pdf letter, comment 18 on page 13 and comment 21 on page 19]	Postconstruction fatality monitoring is intended to better quantify avian and bat fatality rates during operations and determine which adaptive management measures need to be implemented to reduce fatalities, if any. The protocol for carcass searches is dictated by the best available science and literature (not the estimated magnitude of impact to avian and bat populations) and may be further modified by the TAC, if deemed appropriate (see measure u). Additional measure n has been replaced with measure u, which refers to the full Avian and Bat Postconstruction Monitoring Plan that has been added to EIS Appendix 4 (Mitigation).
11978-60	Magic Valley Energy, LLC	58. Appendix 4- Table App4-4, o “Consult with BCI, the TAC, state and federal agencies, or other experts in bat-wind energy experts to determine the best minimization strategy for the species occurring in the area.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter. [see MVE pdf letter, comment 18 on page 13] In addition, the BLM and cooperating agencies with	As described in the response to comment 11978-20 (see in Table A-3cc, Mitigation – EIS Appendix 4), there is uncertainty in quantifying the magnitude of impacts to bats over the 30-year operation phase, and the TAC will need to continuously evaluate new data, literature, and technologies as they become available to determine the best course of action for minimizing bat fatalities that exceed acceptable thresholds. The BLM appreciates

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		expertise on avian and bat issues (e.g., USFWS and IDFG) have reviewed and commented accordingly to MVE's BBCS and worked in concert with MVE to develop the extensive mitigation strategies detailed in the BBCS. Therefore, no further consultation is needed as minimization strategies have been implemented with the appropriate cooperating agencies. As such, MVE requests that this measure be removed from the FEIS on either premise.	MVE's coordination with the USFWS, IDFG, and others; however, the continued consultation requirements described in additional project-specific measure w have been included at the specific request of IDFG and others that have expressed concern that the measures MVE has committed to in the BBCS will be insufficient to address the potential impacts to bat populations from collisions with operational turbines.
11978-61	Magic Valley Energy, LLC	59. Appendix 4- Table App4-4, p "Use data collected by the wind turbines or meteorological towers to relate bat fatality to weather and operational variables." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter. [see MVE pdf letter, comment 18 on page 13] In addition, this has already been implemented in the BBCS as part of the adaptive management strategy. As such, MVE requests that this measure be removed from the FEIS on either premise.	As described in response to comment 11978-20 (see in Table A-3cc, Mitigation – EIS Appendix 4), there is uncertainty in quantifying the magnitude of impacts to bats over the 30-year operation phase, and the TAC will need to continuously evaluate new data, literature, and technologies as they become available to determine the best course of action for minimizing bat fatalities that exceed acceptable thresholds. The adaptive management strategy in the BBCS states that MVE will "consider" model-driven curtailment strategies that correlate bat activity with weather conditions. By requiring that bat fatality data be related to weather data collected by met towers or wind turbines, additional project-specific measure v provides assurance that adaptive management measures implemented to reduce bat fatalities (including curtailment) would be targeted to periods or locations of peak collision risk for bats, which would help minimize the financial impact of implementing adaptive management measures by limiting their scope and duration. Therefore, no revisions are necessary.
11978-62	Magic Valley Energy, LLC	60. Appendix 4- Table App4-4, q "As part of MVE's adaptive management (applicant-committed measure 157), if ferruginous hawk fatalities are observed, implement Tier 5 studies (as per the WEG [USFWS 2012]) to further assess the potential for population-level effects following construction. This could include annual raptor nest monitoring over the life of the facility so that turbines within 1 mile of those nests can be curtailed (applicant-committed measure 158)." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter. [see MVE pdf letter, comment 21 on page 19] In addition, MVE's BBCS (POD Appendix M) details the adaptive management procedures that apply to all avian species, including ferruginous hawk. The adaptive management section of the BBCS prescribes measures including additional on-site studies, installation of anti-perching devices, and strategic curtailment targeting high risk locations and time periods, all of which would serve to ensure that impacts to ferruginous hawks would be avoided, minimized, or compensated appropriately. As such, MVE requests that this measure be deleted for this reason as well, since its goals are already accomplished via the BBCS. If this measure will not be removed, MVE suggests revising this language as follows: "As part of MVE's adaptive management (applicant-committed measure 157), if ferruginous hawk fatalities are observed, implement Tier 5 studies (as per the WEG [USFWS 2012]) to further assess the potential for population-level effects following construction. This could include annual raptor nest monitoring over the life of the facility so that turbines within 1 mile of those nests can be curtailed if turbines within this distance present a risk to nesting ferruginous hawk based on nest monitoring data." (added language underlined)	Siting corridors were adjusted to avoid known active ferruginous hawk nests, and it may be necessary during operation to curtail turbines near active ferruginous hawk nests not previously detected. The TAC would provide adaptive management recommendations based on the results of postconstruction monitoring.
11978-63	Magic Valley Energy, LLC	61. Appendix 4- Table App4-4, s "Continue with acoustic monitoring and roost surveys (for a duration determined by BLM) to document the presence or absence of important roost sites to inform adaptive management (including curtailment)." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter. [see MVE pdf letter, comment 21 on page 19] Also, additional acoustic monitoring and roost surveys would not supply useful information for curtailment that has not already been provided through previous surveys. In addition, MVE has already completed surveys in accordance with the wind energy guidelines, and additional postconstruction surveys are not warranted since adaptive management strategies will be based on postconstruction monitoring as detailed in the BBCS (POD Appendix M). As such, MVE requests that this measure be removed from the FEIS on either premise.	See responses to comments 11978-20 and 11978-25 (see in Table A-3cc, Mitigation – EIS Appendix 4) and 12130-28, 12982-14, and 13008-12 (see in Table A-3b, Bats). Former measure s is now measure aa in EIS Appendix 4 (Mitigation).
11978-64	Magic Valley Energy, LLC	62. Appendix 4- Table App4-4, t "For amphibian habitat avoidance, MVE would survey for amphibians and their breeding habitat within 330 feet of all wetlands in the ground disturbance footprint beginning at the outer edge of hydric vegetation and wetland soil. If breeding habitat is occupied, MVE would coordinate with BLM to identify appropriate mitigation measures before construction." MVE Comment: As detailed in comment 43 of this comment letter, [see MVE pdf letter, comment 43 on page 31] MVE contends that this measure should be deleted since the analysis in the DEIS does not demonstrate any impacts that warrant additional mitigation measures beyond the applicant-committed measures that will effectively protect amphibian species.	See response to comment 11978-46 (see in Table A-3aa, Wildlife, including Big Game).
11978-65	Magic Valley Energy, LLC	63. Appendix 4- Table App4-4, u "During all project phases, MVE would avoid anthropogenic disturbance in big game winter range (assumed to be the entirety of the siting corridors) to the fullest extent (per Idaho IB2021-003 [BLM 2020b]). Generally, mule deer and pronghorn are on winter range from November 15-April 30, but specific dates may be adjusted in coordination with the IDFG regional office. If project activities cannot be avoided during the winter season, MVE would coordinate with the BLM and IDFG prior to NTP to develop standard operating procedures and adaptive management practices that isolate disturbance in the project area so that animals can use wintering areas without unnecessary disturbance. MVE would be required to include a phased approach for construction, maintenance, and decommissioning activities to minimize intrusion on the winter and migration seasons. MVE, BLM, and IDFG would use the following factors to evaluate when adjustments to the intensity or location of activities would be required throughout the wintering and migration seasons: 1. Animal presence or absence (i.e., high or low abundance) 2. Animal condition 3. Weather severity 4. Habitat condition and availability 5. Site location 6. Timing 7. Kind and duration of disruptive activity expected (short term vs. longer term) For example, if during winter, animals were present in the siting corridors or were in poor condition, if there was severe weather (especially for a long period), or it was late in the season when energy reserves may be more depleted, then construction in the area would be adjusted to shift the location, duration, or intensity to	Based on available habitat and distribution information and IDFG and BLM observations, it is reasonable to assume that the full project footprint contains important winter habitat for pronghorn and mule deer. Final mitigation measures for the project include seasonal restrictions for construction and decommissioning activities between January 1 and April 15, and a recommendation to avoid maintenance and repair activities between January 1 and April 30 during the operations phase. A variance process for requests to modify these seasonal restrictions and/or other mitigation measures at site-specific locations is outlined in EIS Appendix 4 (Mitigation).

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		minimize or avoid effects to big game." MVE Comment: MVE requests removal of "assumed to be the entirety of the siting corridors." It is understood that big game individuals could be found throughout the entire Project area, however the Project area does not contain important mule deer wintering areas such as migration stopover areas or migration routes (DEIS Figure 3.18-2) and only partially overlaps with pronghorn migration routes and stopover areas within the Owinza Migration Route (DEIS Figure 3.18-3). If an alternative does not overlap with migration routes or stop over areas, then it should be expected that project activities could continue during the wintering months and impacts could be avoided to big game. Imposing seasonal restrictions on construction in areas outside of the mapped wintering and migration areas would present an undue burden to Project construction and would result in additional environmental impacts by extending the duration of construction over a longer period. Additionally, Idaho IB2021-003 does not require 1) coordination between BLM, IDFG, and MVE regarding standard operating procedures and adaptive management prior to BLM's issuance of a Notice to Proceed (NTP) with construction, or 2) using a "phased approach" for construction, maintenance, and decommissioning activities, since the need for and appropriateness of such measures will be highly situational and may not be possible to determine in advance of the NTP due to construction conditions and weather conditions that may change after the NTP is granted. As such, the phased approach and pre-NTP coordination requirements should be removed. Moreover, Idaho IB2021-003 states that "[f]or transparency, informing the public in NEPA that exceptions and waivers to seasonal restrictions may be granted in certain circumstances may be appropriate." The language in the DEIS does not explicitly state that exceptions or waivers to the restrictions may be authorized in accordance with the terms of Idaho IB2021-003, so MVE recommends that the DEIS measure language be revised to inform the public as suggested in the IB. To incorporate the concepts discussed above and to better match the language from Idaho IB 2021-003, MVE requests that the measure "u" in Table App4-4 be revised to read as follows: "During all project phases, seasonal restrictions within big game winter range typically will apply from November 15 through April 30 each year per IB2021-003 [BLM 2020b]. These dates, as specified, are general in nature and may be adjusted as needed in coordination with the BLM and IDFG. Exceptions and waivers to the seasonal restriction periods may be granted in certain circumstances in accordance with the provisions of BLM 2020b. In considering waivers, modifications, and/or exceptions to seasonal restrictions, the following are examples of factors to be evaluated per BLM 2020b: 1. Animal presence or absence (i.e., high or low abundance) 2. Animal condition 3. Weather severity 4. Habitat condition and availability 5. Site location 6. Timing 7. Kind and duration of disruptive activity expected (short term vs. longer term)"	
11978-66	Magic Valley Energy, LLC	64. Appendix 4- Table App4-4, w "Adaptively manage impacts to big game by supporting long-term telemetry and annual winter counts conducted by IDFG and/or BLM. Use these data to: • Identify, with IDFG, potential pinch points where pronghorn movement may be impacted by the project (especially near the intersection of the project with Highway 24). If pinch points are identified, ensure project fencing in the area allows for big game movement. • Minimize construction traffic volume (if a pinch point is identified) along the route with high game movement, particularly if big game may be migrating to or from their winter range. Focus mitigation efforts and adaptively mange by removing fences, closing roads, reducing speed limits, installing signage, and/or rehabilitating native plants." MVE Comments: a) In order to make this mitigation measure more specific, MVE requests that the introductory language be revised to read as follows: "Adaptively manage impacts to big game by providing funds to purchase up to 20 GPS collars to support long-term telemetry and annual winter counts conducted by IDFG and/or BLM. Use these data to:" (revised portion underlined) b) MVE suggests the following changes to the last bullet point, given that MVE's wildlife friendly fences will support grazing and protection, and BLM manages road closures for the public: Minimize construction traffic volume (if a pinch point is identified) along the route with high game movement, particularly if big game may be migrating to or from their winter range. Focus mitigation efforts and adaptively mange by installing wildlife friendly fencing, reducing speed limits, installing signage, and/or rehabilitating native plants. (revised portion underlined) [see MVE pdf letter, page 43 for underlined text]	Regarding wildlife-friendly fencing, BLM-required measure Y was retained and measure cccc was added: "The BLM would apply more recent fence guidance to BLM fencing handbook H-1741-1 (BLM 1989) [BLM-required measure Y in Table App4-3], such as *A Landowner's Guide to Wildlife Friendly Fences* (Paige 2012). These recommendations include a maximum height (40 inches) and minimum bottom wire height (18 inches) that would facilitate big game passage."
11978-67	Magic Valley Energy, LLC	65. Appendix 4- Table App4-4, aa "MVE would work with owners and operators of communication systems located within and surrounding the project to determine where there is a potential for EMF. Prior to construction of infrastructure that has the potential to result in interference, MVE would work with the owner/operator of the impacted communication system to ensure modifications to the project design, or the communication infrastructure would facilitate the use of the communication without impacts." MVE Comment: This issue is evaluated in DEIS Appendix 3 (Issues Analyzed in Brief), where the analysis commits that mitigation would reduce impacts below significance. MVE requests this language be updated for consistency with the POD and the language in DEIS Appendix 3: "Prior to construction of infrastructure that has the potential to result in significant adverse impacts through EMF, MVE would work with the owner/operator of the impacted communication system to come to a solution." (revised portion underlined)	Measure revised to state, "MVE would work with operators of communication systems located within and surrounding the project to determine where there is a potential for electromagnetic interference (EMI; e.g., impacts to radar, microwave, television, and radio transmissions). Prior to construction, MVE would work with the operator of the potentially impacted communication system to ensure modifications to the project design to reduce potential interference."
11978-68	Magic Valley Energy, LLC	66. Appendix 4- Table App4-4, cc "Fuel storage (for construction, maintenance and decommissioning vehicles and equipment) would be a temporary activity occurring only for as long as is needed to support those activities." MVE Comment: MVE suggests removal of "maintenance," as this measure only applies to construction (and subsequently decommissioning) in the Wind Energy PEIS.	As described in the response to comment 11978-52 (see in Table A-3cc, Mitigation – EIS Appendix 4), BLM (2015) recommends that control and mitigation measures implemented during construction should continue to be implemented during operations. Therefore, no revision is necessary.
11978-69	Magic Valley Energy, LLC	67. Appendix 4- Table App4-4, ee "A paleontological evaluation would be completed prior to decommissioning to determine the potential of material source areas not yet determined (associated with project decommissioning and reclamation) to contain	Revised additional measure (now labeled yy), to clarify the paleontological evaluation would only apply to material source locations that have not been previously evaluated for the project.

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		paleontological resources. If deemed necessary, a monitoring and inadvertent discovery plan would be developed to reduce the likelihood of impact to these resources." MVE Comment: MVE requests removal of this measure, as decommissioning of a wind energy development project has a negligible potential for affecting paleontological resources because the decommissioning areas will overlap the construction disturbance areas, which means the resources would have been evaluated and treated by a qualified professional prior to construction (per the mitigation measures as described in Section 5.2.5).	
11978-70	Magic Valley Energy, LLC	68. Appendix 4- Table App4-4, hh "Insecticide use is prohibited except where explicitly authorized by the BLM Field Manager." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter. [see MVE pdf letter, comment 35 on page 26]	MVE Comment 35 is specific to the St. Anthony sand dune tiger beetle and is addressed in the response to comment 11978-38 (see in Table A-3t, Pollinators and Insects). The prohibition of insecticide use without authorization is intended to minimize impacts to all insects and pollinators. The BLM's authority to develop required mitigation for inclusion in the terms and stipulation of a ROW grant are not limited to those impacts are expected to be significant. In the case of the St. Anthony sand dune tiger beetle and other BLM-sensitive species, the BLM has a responsibility to identify and implement proactive mitigation measures that would minimize or avoid impacts before they occur. Therefore, no revisions are necessary.
11978-71	Magic Valley Energy, LLC	48. Appendix 4- Table App4-3, K "MVE would equip aboveground facilities (buildings and other structures where birds could perch or nest) with structures or devices that discourage perching or nesting of raptors and ravens." (BLM 2015 RDF #70) MVE Comment: As RDF #70 in BLM 2015 does not include the words "perch" or "perching," MVE requests removal of these terms in the FEIS to match the language in BLM 2015: "MVE would equip aboveground facilities (buildings and other structures where birds could nest) with structures or devices that discourage nesting of raptors and ravens."	See response to comment 11978-48 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-72	Magic Valley Energy, LLC	69. Appendix 4- Table App4-4, ii "Do not use pesticides known to be toxic to bees or other pollinators. Avoid applying multiple pesticide formulations at one time. Apply pesticides at the lowest legal effective application rate and using targeted application methods. Time pesticide application to avoid pollinator exposure as per McKnight et al. (2018)." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter; [see MVE pdf letter, comment 35 on page 26] however, if this measure will not be removed, the following comment applies: MVE suggests this language be updated to match McKnight et al. 2018: "Do not use pesticides known to be toxic to bees or other pollinators, when at-risk species are present. Avoid applying multiple pesticide formulations at one time. Apply pesticides at the lowest legal effective application rate and using targeted application methods. Time pesticide application to avoid pollinator exposure as per McKnight et al. (2018)." (revised portion underlined)	Measure not edited to include ", when at-risk species are present."
11978-73	Magic Valley Energy, LLC	70. Appendix 4- Table App4-4, jj "Sensitive species surveys (applicant-committed measure 12) would include surveys for presence of sensitive pollinators (i.e., monarch butterfly, Suckley's cuckoo bumble bee, and western bumble bee) from May through October." MVE Comment: MVE requests removal of this measure. Pollinators can migrate/move from one area to another rather easily, which may render survey efforts uninformative. The mitigation measures (applicant-committed. other BLM additional measures, and compensatory mitigation) have already captured strategies to not only protect pollinators, but also provide benefits for the species. These include the lowering speed limits, addition of milkweed surveys, removal of noxious weeds, seeding with desired plant species in an effort to provide a better habitat. Compensatory measures listed in the DEIS such as funding restoration for sensitive plants (Measure II) and funding riparian habitat improvements (Measure VI) effectively serve as measures and compensatory mitigation for pollinators.	This measure has been deleted. Survey requirements for monarch butterfly have been combined with the milkweed survey requirements in measure zz. The preconstruction survey requirements for Suckley's cuckoo bumble bee and western bumble bee have been changed to indicate that these species will be recorded incidentally as part of the WIRS.
11978-75	Magic Valley Energy, LLC	71. Appendix 4- Table App4-4, kk "If it is not possible for MVE to design the project to completely avoid prime farmland and farmland of statewide importance, MVE would minimize or mitigate impacts to prime farmland and farmland of statewide importance as determined by BLM" MVE Comment: MVE notes that wind development is compatible with agricultural use of lands as evidenced by numerous wind facilities that coexist with agricultural areas (both croplands and grazing lands) throughout the U.S. and elsewhere. Additionally, the Project will not result in permanent impacts to prime farmland or farmland of statewide importance since MVE will reclaim temporary disturbances after construction in accordance with our postconstruction reclamation requirements and MVE will have a bonded post-decommissioning reclamation plan in place that will ensure the land will remain suitable for agricultural use at the end of the Project life. As such, the Project's extensive reclamation requirements will sufficiently minimize and mitigate all impacts to prime farmland and farmland of statewide importance, and as such, no additional mitigation is needed. Moreover, prime farmland and farmland of statewide importance mapping layers provided to the BLM all carried the designation "if irrigated", and MVE noted in our review that these areas do not appear to be irrigated in any locations where they overlap with the Project siting corridors. It seems likely that actually irrigating these lands and using them for agricultural production would have the potential for significant environmental impacts in terms of water usage and surface disturbance impacts to sensitive biological and cultural resources, which would require detailed NEPA review by BLM prior to any such activities being undertaken. Based on the foregoing, MVE proposes that this measure be deleted in the FEIS and a note added in the FEIS Issues Analyzed in Brief section specifying that MVE's postconstruction and post- decommissioning reclamation plans will be sufficient to mitigate all impacts to these farmland types.	This measure supports the AIB-34 analysis rationale. Measure not edited.
11978-76	Magic Valley Energy, LLC	72. Appendix 4- Table App4-4, ll "Construction, maintenance, and decommissioning activities would not be performed during periods when the soil is too wet to adequately support equipment. If such equipment creates	Requested edit not made. This is now measure hhh in the final EIS.

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		ruts in excess of 5 inches deep. The soil would be deemed too wet to adequately support it." MVE Comment: MVE requests this language be updated as follows to allow the use of rigid matting if needed to provide a stabilized surface on which to operate equipment while preventing rutting of the surface: "Construction, maintenance, and decommissioning activities would not be performed during periods when the soil is too wet to adequately support equipment. If such equipment creates ruts in excess of 5 inches deep for 100 feet, rigid matting may be used to create a stable pathway until soils are able to adequately support equipment. Otherwise, the soil would be deemed too wet to adequately support it." (revised portion underlined)	
11978-77	Magic Valley Energy, LLC	73. Appendix 4- Table App4-4, mm "MVE would evaluate whether project construction activities and infrastructure could occur outside of 0.75-mile of potential and occupied St. Anthony sand dune tiger beetle habitat. Where it is not possible to avoid these areas, field surveys would be conducted and project construction would avoid new identified or potential or occupied habitat to the extent feasible allowing for access along existing roads. Avoid fragmenting habitats with roads within 0.75 miles of occupied tiger beetle habitat to allow for dispersal. Minimize new infrastructure and the density of infrastructure near dune complexes." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter. [see MVE pdf letter, comment 35 on page 26] In addition, MVE's applicant-committed measures provide equivalent or better protections to the species, and any additional measures are unnecessary. As such, MVE requests that this measure be removed from the FEIS on either premise. However; if this measure will not be removed, the following comment applies: MVE requests changing the language for consistency with the measures described in DEIS Section 3.11.2.2.2: "MVE would evaluate whether project construction activities and infrastructure could occur outside of 0.75-mile of good or occupied St. Anthony sand dune tiger beetle habitat. Where it is not possible to avoid these areas, field surveys would be conducted and project construction would avoid occupied habitat to the extent feasible allowing for access along existing roads. Avoid fragmenting habitats with roads within 0.75 miles of occupied tiger beetle habitat to allow for dispersal. Minimize new infrastructure and the density of infrastructure near dune complexes." (revised portion underlined)	Requested edit not made. The BLM has revised this measure since the draft EIS.
11978-78	Magic Valley Energy, LLC	74. Appendix 4- Table App4-4, nn "Limit construction personnel walking across sand dunes." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter. [see MVE pdf letter, comment 35 on page 26]	As stated in Section 2.1.C of the BLM Mitigation Manual (BLM 2021), "The BLM will identifies and considers mitigation to address impacts to resources in NEPA analyses for proposed public land uses, and, as appropriate, requires mitigation to address impacts to resources in the associated decision documents and land use authorizations ([Manual] Chapter 6 and [Manual] Chapter 7). The BLM will identify, consider, and, as appropriate, require mitigation, to address reasonably foreseeable impacts, whether or not the impacts are "significant" (as defined by 40 CFR 1508.1). The BLM has authority to require appropriate mitigation under a variety of authorities, including FLPMA (Manual Section 1.3)."
11978-79	Magic Valley Energy, LLC	75. Appendix 4- Table App4-4, oo "MVE would avoid disturbance to known BLM-listed sensitive plant individuals and habitat. If BLM, in coordination with MVE, determines that avoidance of all sensitive plant locations is not achievable the BLM would determine if MVE can proceed with construction, maintenance, or decommissioning activities after considering the species present and the type and intensity of the activity planned in the specific location. If disturbance and impact to the special-status species is expected to contribute to a population decline resulting in a trend to federal listing under the ESA, the activity would not be authorized until mitigation measures would be sufficient to reverse this trend. If it would result in a loss in individual plants or population viability that would not be expected to contribute to a trend to federal listing, mitigation stated in applicant- committed measure 107 would be required prior to proceeding." MVE Comment: MVE requests the addition of a time limit for a BLM response in order to prevent costly construction delays that could also result in higher environmental impacts due to prolonged construction. The revised measure would read as follows: "MVE would avoid disturbance to known BLM-listed sensitive plant individuals and habitat. If BLM, in coordination with MVE, determines that avoidance of all sensitive plant locations is not achievable the BLM would determine if MVE can proceed with construction, maintenance, or decommissioning activities after considering the species present and the type and intensity of the activity planned in the specific location. If disturbance and impact to the special-status species is expected to contribute to a population decline resulting in a trend to federal listing under the ESA, the activity would not be authorized until mitigation measures would be sufficient to reverse this trend. For any mitigation proposal submitted by MVE, the BLM would review the proposal and either request additional information or provide authorization within 10 days; mitigation proposals for which no response is received within 10 days would be deemed approved. If it would result in a loss in individual plants or population viability that would not be expected to contribute to a trend to federal listing, mitigation stated in applicant- committed measure 107 would be required prior to proceeding." (revised portion underlined)	No revision made to this measure. The BLM and MVE review and response timeframes and responsibilities are included in the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]).
11978-80	Magic Valley Energy, LLC	76. Appendix 4- Table App4-4, pp "MVE would work with FAA to adjust turbine height or micro siting as needed to avoid impacts to Jerome Airport airspace." MVE Comment: MVE requests updating this measure language to reflect that there is a wide range of mechanisms by which the Project may address airspace concerns in accordance with FAA regulations: "MVE would work with FAA as needed to ensure that the Project is designed to meet FAA regulations with respect to Jerome Airport airspace."	Revision incorporated.
11978-81	Magic Valley Energy, LLC	77. Appendix 4- Table App4-4, xx "Use of dull gray porcelain or polymer insulators to reduce insulator visibility." MVE Comment: MVE requests removal of this measure, as insulators will not have a noticeable effect on the visual resources given the insulators will not be a prominent visual element in the viewscape. Glass insulators offer benefits such as longer lifespan - which may eliminate the need to replace insulators during the life of the	This measure was removed.

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		Project, which can prevent or minimize operation and maintenance disturbances. Additionally, glass insulators already occur on transmission line infrastructure in existing rights-of-way that extend through the Project area.	
11978-82	Magic Valley Energy, LLC	78. Appendix 4- Table App4-4, aaa "If necessary to install project infrastructure in wetlands or drainages (including ephemeral channels), installation would occur during dry periods or if areas are wetted, and if dewatering is needed, it would occur in well vegetated areas. Buried collector lines would route around wetlands; overhead collector lines may cross wetlands." MVE Comment: MVE previously discussed wetland measures with BLM and added Applicant- Committed Measures 117, 120, and 122 (among MVE's other measures 117 through 134 to protect wetlands and water quality) to the POD. These Applicant-Committed Measures address the wetland protections that we understand BLM intended to ensure with Table App4-4 item aaa. As such, we request that BLM remove this measure from the FEIS.	See additional project-specific measure www which includes more specific requirements for construction, where avoidance of wetlands is not possible, that are not addressed in MVE's applicant-committed measures. No revisions are necessary.
11978-83	Magic Valley Energy, LLC	79. Appendix 4-Table App4-5. MVE Comment: As a comment globally applicable to each compensatory mitigation measure listed in Table App4-5, MVE proposes that BLM add an option for MVE to satisfy the mitigation measure by contributing to a mitigation fund by which the mitigation for that resource would be accomplished by a third party.	Added "Table App4-5 describes compensatory mitigation options. These options are not meant to limit compensatory mitigation measures; in the future, the BLM and MVE may consider other measures not listed in Table App4-5." to the first paragraph before Table App4-5.
11978-84	Magic Valley Energy, LLC	80. Appendix 4-Table App4-5, I "If postconstruction carcass monitoring (mitigation measure VII), IDFG telemetry data, and/or annual winter counts indicate impacts to big game or avoidance of the area by big game, then consider the following: • Fence removal or modification and habitat enhancement in areas inside but as well as immediately adjacent to the project area. • If big game movement across Highway 24 becomes more concentrated and/or wildlife-vehicle collisions increase after the project begins, add measures that would reduce mortalities, e.g. sensors that would detect animals approaching the highway and warn drivers. • Improve big game winter habitat south of the project area by planting sagebrush and bitterbrush, treating invasive annual grasses with herbicide, and seeding perennial grass. • Modify or remove existing fences within the Smokey-Boise and/or Big Desert- Mountain Valley Complex Secretarial Order 3362 Priority Areas. • Plant or seed shrubs such as bitterbrush and sagebrush on winter ranges that are currently limited in browse or shrub cover. • Could augment current/ongoing fire rehabilitation or restoration efforts nearby or in other important areas within the Smokey-Boise and Big Desert-Mountain Valleys SO3362 priority areas. • Control noxious or invasive weeds on winter range." MVE Comment: Regarding collisions on Highway 24, collisions could be increased by a number of factors, such as variability in population numbers or population density in a given area, residential development, weather, food source availability, etc. Therefore, it would not be logical to attribute all increases in collisions to the Project. MVE requests specification of this measure: "If post- construction carcass monitoring (mitigation measure VII), IDFG telemetry data, and/or annual winter counts demonstrate Project-caused impacts to big game or Project-caused avoidance of the area by big game that is expected to contribute to a population decline resulting in a trend to federal listing under the ESA, then consider the following…" (revised portions underlined)	This request was not incorporated into the mitigation measures, as the threshold of "contribute to a population decline resulting in a trend to federal listing under the ESA" is inappropriate for species with local population concerns. Pronghorn and mule deer populations range across the western United States, and contribution of a single project would be unlikely to contribute to population losses to the degree at which listing under the ESA would be warranted. As such, the request is not an appropriate metric with which to trigger the need for compensatory mitigation to address local population losses that may result from the project.
11978-85	Magic Valley Energy, LLC	81. Appendix 4- Table App4-5, II "If MVE determines avoidance of sensitive plants is not feasible, construction would be allowed to proceed, and MVE would fund restoration at degraded population sites in coordination with BLM." MVE Comment: Since effects to individual plants or small stands of plants would not be expected to have population-level effects or warrant mitigation, MVE requests this measure specify that compensatory mitigation is required only when the Project has a negative effect on species populations: "If MVE determines avoidance of sensitive plants is not feasible, construction would be allowed to proceed in coordination with BLM. If the Project impacts are expected to contribute to a population decline resulting in a trend to federal listing under the ESA, MVE would fund restoration at degraded population sites at a 1:1 ratio in coordination with BLM."	This measure has been combined into additional measure kkk: "MVE would avoid disturbance to known BLM special-status plant individuals and habitat. If BLM determines that avoidance of all special-status plant locations is not achievable, the BLM would determine whether MVE can proceed with construction, maintenance, or decommissioning activities after considering the species present and the type and intensity of the activity planned in the specific location. If disturbance and impact to the BLM special-status species would occur, BLM would require MVE to complete: • Seed collection and banking from the impacted population(s). • Plant propagation with a portion of the seed collected, and out-planting to suitable reclaimed areas and other habitat in the area. MVE would implement these measures as directed by the BLM, following BLM (2008b)."
11978-86	Magic Valley Energy, LLC	82. Appendix 4- Table App4-5, III "Purchase or acquire through exchange lands with existing tiger beetle habitats or dunes occurring on private or state lands. Opportunities may occur off-site, such as the dune areas north of Lake Walcott between Rupert and American Falls, Idaho." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter; [see MVE pdf letter, comment 35 on page 26] however, if this measure will not be removed, the following comment applies: MVE has requested above that Table App4-4 additional mitigation measure mm be worded as follows: "MVE would evaluate whether project construction activities and infrastructure could occur outside of 0.75-mile of good or occupied St. Anthony sand dune tiger beetle habitat. Where it is not possible to avoid these areas, field surveys would be conducted and project construction would avoid occupied habitat to the extent feasible allowing for access along existing roads." Given that Table App4-4 additional mitigation measure mm would adequately protect good and occupied tiger beetle habitat by siting infrastructure outside of a standard 0.75-mile radius, compensatory mitigation does not seem warranted unless the Project causes population level impacts by creating new surface disturbance to good or occupied tiger beetle habitat. As such MVE requests that measure III be changed to read, "If the Project causes population level impacts via new surface disturbance to good or occupied habitat, MVE will purchase or acquire through exchange lands with existing tiger beetle habitats or	See response to comment 11978-38 (see in Table A-3t. Pollinators and Insects). This additional measure (formerly "mm", now "iii") has been revised to "If placement of infrastructure or construction activities within 0.75-mile of potential St. Anthony sand dune tiger beetle identified in WEST (2020) cannot be avoided, MVE would conduct pre-construction field verification surveys following the same methodology described in WEST (2020). Surveys must occur during the appropriate detection window (April through June). No construction activities or infrastructure would be allowed within occupied St. Anthony sand dune tiger beetle habitat; avoid fragmenting habitats with new roads within 0.75 mile of occupied tiger beetle habitat to allow for dispersal, allowing for access along existing roads. Minimize new infrastructure and the density of infrastructure near occupied tiger beetle habitat. MVE would be required to consult with BLM on measures to minimize impacts to tiger beetles and their habitat." The final EIS states: "With the implementation of applicant-committed measures and additional mitigation, including avoidance of occupied habitat (see EIS Appendix 4), impacts to St. Anthony sand dune tiger beetle would be largely minimized or avoided. If during site-specific project design the BLM and MVE determine complete avoidance of potential habitat is not feasible, compensatory mitigation measures (see Table App4-5 in EIS Appendix 4) would be warranted and could include the following:

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		dunes occurring on private or state lands. Opportunities may occur off-site, such as the dune areas north of Lake Walcott between Rupert and American Falls, Idaho."	• Measure II: Purchase or acquire through exchange lands with existing tiger beetle habitats or dunes occurring on private or state lands. Opportunities may occur off-site, such as the dune areas north of Lake Walcott between Rupert and American Falls, Idaho. • Measure III: Treat noxious or invasive weeds (i.e., cheatgrass, Russian thistle, others) in or adjacent to dunes/dune complexes to reduce undesirable/nonnative vegetation cover on dunes. • Measure IV: Where dunes have been previously stabilized by perennial grass seedings, consider chemical treatment or other disturbance to reduce grass cover to foster tiger beetle habitat and restore the natural integrity of dune complexes."
11978-87	Magic Valley Energy, LLC	83. Appendix 4- Table App4-5, IV "Treat noxious or invasive weeds (i.e., cheatgrass, Russian thistle, others) in or adjacent to dunes/dune complexes to reduce undesirable/nonnative vegetation cover on dunes." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter; [see MVE pdf letter, comment 35 on page 26] however, if this measure will not be removed, the following comment applies: As discussed above, given that the revised version of Table App4-4 additional mitigation measure mm would adequately protect good and occupied tiger beetle habitat by siting infrastructure outside of a standard 0.75-mile radius, compensatory mitigation does not seem warranted unless the Project causes population level impacts by creating new surface disturbance to good or occupied tiger beetle habitat. As such, MVE requests that measure IV be changed to read: "If the Project causes population level impacts via new surface disturbance to good or occupied habitat, MVE will treat noxious or invasive weeds (i.e., cheatgrass, Russian thistle, others) in or adjacent to dunes/dune complexes to reduce undesirable/nonnative vegetation cover on dunes."	See response to comment 11978-86 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11978-88	Magic Valley Energy, LLC	84. Appendix 4- Table App4-5, V "Where dunes have been previously stabilized by perennial grass seedings, consider chemical treatment or other disturbance to reduce grass cover to foster tiger beetle habitat and restore the natural integrity of dune complexes." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 35 in this comment letter; [see MVE pdf letter, comment 35 on page 26] however, if this measure will not be removed, the following comment applies: As discussed above, given that the revised version of Table App4-4 additional mitigation measure mm would adequately protect good and occupied tiger beetle habitat by siting infrastructure outside of a standard 0.75-mile radius, compensatory mitigation does not seem warranted unless the Project causes population level impacts by creating new surface disturbance to good or occupied tiger beetle habitat. As such, MVE requests that measure IV be changed to read, "If the Project causes population level impacts via new surface disturbance to good or occupied habitat, where dunes have been previously stabilized by perennial grass seedings, MVE will consider chemical treatment or other disturbance to reduce grass cover to foster tiger beetle habitat and aid in the restoration of the dune complexes.	See response to comment 11978-86 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11978-89	Magic Valley Energy, LLC	85. Appendix 4-Table App4-5, VI "Contribute to riparian habitat improvement project to improve bat foraging habitat." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter; [see MVE pdf letter, comment 18 on page 13] however, if this measure will not be removed, the following comment applies: MVE suggests changing to: "Contribute funds to riparian habitat improvement projects to improve bat foraging habitat." (revised portion underlined)	See response to comment 11978-116 (see in Table A-3b. Bats). Minor text revision made.
11978-90	Magic Valley Energy, LLC	87. Appendix 4-Table App4-5, VIII "Contribute funds to assist with research on white nose syndrome and vaccination against white nose syndrome." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter; [see MVE pdf letter, comment 18 on page 13] however, if this measure will not be removed, the following comment applies: Such contributions would only seem warranted in the event that the Project causes population-level impacts that could result in a trend toward federal listing. MVE proposes that the measure be revised to read as follows: "If Project impacts cause a population decline resulting in a trend toward federal listing under the ESA, MVE will contribute funds to assist with research on white nose syndrome and vaccination against white nose syndrome."	The measures listed in "Types of Mitigation Actions" (see Mitigation Framework for Birds and Bats in EIS Appendix 4) are examples of the types of compensatory mitigation measures that may be considered for bats. The TAC will be responsible for reviewing the results of postconstruction fatality monitoring and recommending compensatory mitigation measures, as warranted, based on the best available science and technology at that time. EIS Section 3.3.1.4 (Bat Populations and Roosting Habitat, Compensatory Mitigation) states that compensatory mitigation would be required, if adaptive management measures do not reduce fatalities below the adaptive management threshold. The adaptive management threshold would be developed by the TAC and would be based on species' population trends and current meta-analysis of wind energy impact on birds and bats.
11978-91	Magic Valley Energy, LLC	88. Appendix 4-Table App4-5, IX "Construct and maintain artificial nesting platforms for ferruginous hawks in appropriate habitats off-site." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter; [see MVE pdf letter, comment 21 on page 19] however, if this measure will not be removed, the following comment applies: Such measures would only seem warranted in the event that the Project causes population-level impacts that could result in a trend toward federal listing. Additionally, MVE does not have expertise in constructing and maintaining nesting platforms. As such, MVE proposes that the measure be revised to read as follows: "If Project impacts cause a population decline resulting in a trend toward federal listing under the ESA, MVE will contribute funds to construct and maintain artificial nesting platforms for ferruginous hawks in appropriate habitats off-site."	See responses to comments 11978-83 (see in Table A-3cc, Mitigation – EIS Appendix 4) and 11978-90 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-92	Magic Valley Energy, LLC	89. Appendix 4-Table App4-5, X "Construct and maintain artificial nest burrows for burrowing owls in appropriate habitats off- site." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter; [see MVE pdf letter, comment 21 on page 19] however, if this measure will not be removed, the following comment applies: Such measures would only seem warranted in the event that the Project causes population-level impacts that could result in a trend toward federal listing. Additionally, MVE does not have expertise in constructing or maintaining artificial burrows. As such, MVE proposes that the	See responses to comments 11978-83 (see in Table A-3cc, Mitigation – EIS Appendix 4) and 11978-90 (see in Table A-3cc, Mitigation – EIS Appendix 4).

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		measure be revised to read as follows: "If Project impacts cause a population decline resulting in a trend toward federal listing under the ESA, MVE will contribute funds to construct and maintain artificial nesting burrows for burrowing owls in appropriate habitats off-site."	
11978-93	Magic Valley Energy, LLC	90. Appendix 4-Table App4-5, XI "Consider measures for other special-status species and other species of concern, as determined through postconstruction monitoring." MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 21 in this comment letter. [see MVE pdf letter, comment 21 on page 19] Additionally, the primary affected resource listed in the table for this measure is avian and bat species. MVE notes that the Project's BBCS (POD Appendix M) is applicable to other special-status avian and bat species and provides detailed procedures for conducting postconstruction monitoring and adaptive management requirements, which include additional avoidance, minimization, and compensation measures applicable to other special status avian and bat species. Measure XI is therefore redundant with the BBCS requirements. As such, MVE requests that this measure be removed from the FEIS on either premise.	This measure clarifies that the TAC may recommend, and the BLM Authorized Officer may require, compensatory mitigation for any special-status avian species (not just those discussed in the EIS or BBCS) if postconstruction monitoring indicates such measures are warranted. Therefore, no revision is necessary.
11978-94	Magic Valley Energy, LLC	91. Appendix 4-Table App4-5, XIII "If impacts to sensitive plants during ground-disturbing activities cannot be avoided, MVE would implement the following: • Seed collection and banking from impacted population(s). • Plant propagation with a portion of the seed collected, and out-planting to suitable reclaimed areas and other habitat in the area. • A comprehensive weed treatment plan. Conserving a currently unprotected occurrence of these plant species, including a conservation easement and funding to manage the species in perpetuity, would be considered where the above measures are not feasible, and it is appropriate for the species." MVE Comment: Compensatory Mitigation Measure II already captures the essence of this compensatory mitigation goal, as funding through Compensatory Mitigation Measure II can be used to complete the objectives stated. In addition, when evaluated in conjunction with applicant- committed measures, additional mitigation measures, and Compensatory Mitigation Measure II, any residual impacts would be negligible. Requiring a conservation easement and funding in perpetuity does not follow the BLM's mitigation principles, which call for mitigation measures to be commensurate with the level of impact to the environmental resource. MVE requests that this measure be removed in the FEIS.	See response to comment 11978-85 (see in Table A-3cc, Mitigation – EIS Appendix 4).
11978-95	Magic Valley Energy, LLC	92. Appendix 4-Table App4-5, XIV "MVE would fund the design and preparation of an ethnographic study and report related to Minidoka National Historic Site. This would be accomplished in close coordinate with Japanese American Stakeholders and the National Park Service." MVE Comment: The Table App4-5 mitigation measures are described in the DEIS as compensatory mitigation measures that could be applied to alternatives if significant impacts are expected to remain after applicant-committed measures, required mitigation, and additional avoidance and minimization measures are implemented. Ethnographic information would be part of the context provided in the cultural resource surveys and potentially the Historic (Properties Management Plan) to be prepared as part of the National Historic Preservation Act (NHPA) Section 106 consultation process. A Programmatic Agreement (PA) is currently being prepared by the Section 106 Consulting Parties that will set forth the process to be followed in executing the Section 106 process for the Project. Certain actions to be carried out under the PA, such as cultural resources field surveys and reporting, will not be completed until after the BLM's record of decision is issued. As such, the need for this mitigation measure (DEIS Table App4-5, item XIV) would not be known until after the BLM's Record of Decision is issued. As such, MVE requests that this measure be removed in the FEIS, and the need for ethnographic information would be addressed in the Section 106 process to prevent the potential for conflicting requirements.	Compensatory Mitigation Measures VI and VII were updated in the final EIS, per coordination with the BLM, based on draft EIS comments regarding ethnographic studies not being an acceptable form of mitigation.
11978-96	Magic Valley Energy, LLC	93. Appendix 4-Table App4-5, XV "MVE would fund the design and preparation of an ethnographic study and report related to Shoshone-Bannock Tribes and Shoshone-Paiute Tribes. This would be accomplished in close coordinate with these Native American Tribes." MVE Comment: As discussed in the comment above, the need for this mitigation measure (DEIS Table App4-5, item XV) would not be known until later in the Section 106 consultation process after the BLM's Record of Decision is issued. As such, MVE requests that this measure be removed in the FEIS, and the need for ethnographic information would be addressed in the Section 106 process to prevent the potential for conflicting requirements.	Compensatory Mitigation Measures VI and VII were updated to remove potential ethnographic studies.
11978-97	Magic Valley Energy, LLC	94. Appendix 4-Table App4-5, XVI "MVE would establish a fund to be used based on recommendations from a committee that would be established and comprise Minidoka NHS stakeholders with an emphasis on including representatives of Japanese American organizations. Recommendations from the committee would focus on enhancing the fundamental values of Minidoka NHS so that it will continue to provide opportunities for commemoration and healing through pilgrimages and provide opportunities for bettering humanity as a site of conscience. Recommendations from the committee may include but are not limited to the following: • Establishing conservation easements to preserve the visual character of the surrounding landscape • Removal of existing visual intrusions within close proximity to Minidoka NHS that take away from meeting its fundamental values Increasing access to pilgrimages and educational materials that provide a better understanding of the history associated with Minidoka NHS." MVE Comment: All mitigation measures, including compensatory mitigation measures, that are built around protections for cultural resources would be most appropriately addressed in the Section 106 process through the Programmatic Agreement, Historic Properties Management Plan, or Historic Preservation Treatment Plans to avoid conflicting management requirements. MVE requests that this measure be deleted in the FEIS and left to be addressed through the Section 106 process.	Also see response to comment 11978-95 (see in Table A-3cc, Mitigation – EIS Appendix 4). The EIS text in Section 3.5.3 (Programmatic Agreement) clarifies that the PA specifies potential avoidance, minimization, and mitigation measures and where avoidance would not eliminate adverse effects, final measures for minimization or mitigation of adverse effects would be included in an HPMP and HPTPs for specific properties, which would be developed pursuant to the stipulations of the PA. The measures listed in Alternative B with the Additional Measures portions of Section 3.5.4.2.2 and Section 3.5.5.2.2, are mitigation that the BLM would apply to Alternative B and are applicable to other resources (not only cultural resources); these measures will remain in the final EIS. The stipulations listed in EIS Section 3.5.3 that the "BLM would ensure the design of the project includes" have been removed from the final EIS, consistent with PA version updates beyond the draft EIS. The BLM's priority for treatment of adverse effects to historic properties is avoidance, minimization, mitigation. Mitigation should be commensurate with the nature of the adverse effect. Where such mitigation would not adequately resolve adverse effects, and would result in residual impacts to the affected communities (Japanese American and Minidoka-connected communities and Tribes), compensatory mitigation can be applied. The compensatory mitigation text in Section 3.5.5.4 in Cultural Resources was updated to include a sentence clarifying that similar to development of measures to avoid, minimize, or mitigate non-physical impacts to cultural resources under the HPMP as part of the project's PA, compensatory mitigation measures (should the BLM

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			determine these are warranted), would be developed and implemented through the Section 106 consultation process under the HPMP, under the PA.
11978-114	Magic Valley Energy, LLC	16. Section 3.03.1.2.2 - Bat Populations “Using data collected during post- construction monitoring, MVE would develop curtailment strategies in coordination with the BLM, USFWS, IDFG, and Idaho Governor’s Office of Species Conservation (OSC) (applicant-committed measure 158).” MVE requests changing existing language to better capture postconstruction curtailment and monitoring strategies: “If needed to further reduce fatalities, MVE would use the data collected during postconstruction monitoring to develop curtailment strategies to avoid population-level impacts to species of concern in coordination with the BLM, USFWS, IDFG, and Idaho Governor’s Office of Species Conservation (OSC) (applicant-committed measure 158).”	Mitigation measures related to curtailment have been revised and clarified in the final EIS; therefore, the requested revision is no longer necessary.
11978-115	Magic Valley Energy, LLC	17. Section 3.03.1.2.2 - Bat Populations “The curtailment strategy would describe the type and number of detection devices required for successful implementation and would include an adaptive management framework that identifies how fatalities would be monitored and when adjustments would be necessary to further reduce fatalities.” MVE requests the FEIS should state the following to align with the POD: “The curtailment strategy would describe the type and number of detection devices required for successful implementation and would include an adaptive management framework that identifies how fatalities would be monitored and when adjustments would be necessary to further reduce fatalities. Alongside the implementation of other mitigation strategies, the cost effectiveness of curtailment strategies will be taken into consideration when evaluating their potential viability.”	References to MVE’s BBCS have been provided in this section, and it is not necessary to repeat these details here. This language is also included in the full mitigation measure (applicant-committed measure 158) in EIS Appendix 4 (Mitigation).
11978-146	Magic Valley Energy, LLC	48. Appendix 4- App4-2c, #23 “Where practical, lighting at both the operation and maintenance facilities and substations located within 0.5 mile of the turbines would include at a minimum the following: Lights with motion or heat sensors and switches would be used to keep lights off when not required. Outdoor facility lighting would be designed with light caps and/or directed downward to minimize off-site glare. The use of high-intensity lighting, steady- burning lights, or bright lights such as sodium vapor, quartz, halogen, or other bright spotlights would be minimized. All internal turbine nacelle and tower lighting would be extinguished when unoccupied. Turbine doors would not have exterior lights installed at the entrance.” MVE is noting that exterior lighting of turbine doors is a required safety feature. To accommodate this, MVE suggests changing the language to: “Where practical, lighting at both the operation and maintenance facilities and substations located within 0.5 mile of the turbines would include at a minimum the following: Lights with motion or heat sensors and switches would be used to keep lights off when not required. Outdoor facility lighting would be designed with light caps and/or directed downward to minimize off-site glare. The use of high-intensity lighting, steady-burning lights, or bright lights such as sodium vapor, quartz, halogen, or other bright spotlights would be minimized. All internal turbine nacelle and tower lighting would be extinguished when unoccupied. The exterior lights at turbine entrance doors will be turned off unless they are needed for safe entrance/exit to the turbine or for O&M activities. Exterior turbine entrance door lights will be operated by a switch, motion detector, or remotely through the SCADA system.”	Applicant-committed measure 23 in Table App4-2c has been revised as requested.
11978-147	Magic Valley Energy, LLC	49. Appendix 4- App4-2e, #34 “Roads negatively affected by construction would be returned to preconstruction condition.“ This measure should be deleted as it is covered more aptly in measure #39, which further matches the language in the POD: All existing public roads that are used or improved by MVE during the course of construction would be left in a condition that is as good as or better than their condition when the construction period begins. Roadways identified for use would be videotaped and accompanied by supporting notes prior to construction.	Edit made as requested.
11978-148	Magic Valley Energy, LLC	50. Appendix 4- App4-2e, #35 “Where road intersection improvements would be required to accommodate extra-long vehicles, potential upgrades could include placement of relocating signs, placement of temporary paving, and use of flaggers, as needed. Upon completion of construction, most intersection improvements would be restored to a condition sufficient for the operations phase of the project. Intersection improvements would be re-established during the operation and maintenance phase, as needed, to accommodate large equipment (for example, replacing a wind turbine blade).” This measure should be modified to match the language in the POD: “Where road intersection improvements would be required to accommodate extra-long vehicles, potential upgrades could include placement of relocating signs, placement of temporary paving, and use of flaggers, as needed. Upon completion of construction, some intersection improvements would be restored to a condition sufficient for the operations phase of the project. Intersection improvements would be re-established during the operation and maintenance phase, as needed, to accommodate large equipment (for example, replacing a wind turbine blade).”	Edit made as requested.
11978-150	Magic Valley Energy, LLC	52. Appendix 4- App4-2h, #72 “Construction vehicles (trucks, bulldozers, etc.), helicopters (if required), and equipment (pumps, generators, etc.) would be fueled and serviced in designated areas that are flat.” This measure should be removed, as it has been updated. and is now accurately addressed in Applicant-Committed mitigation measure #134: “Construction vehicles (trucks, bulldozers, etc.), helicopters (if required), and equipment (pumps, generators, etc.) generally would be fueled and serviced in designated areas. Refueling locations would generally be flat. Fueling or refueling would not occur within 50 feet of a wetland or watercourse. Every effort would be made to minimize the threat of a fuel spill during refueling and servicing and secondary containment measures would be located at all fuel handling areas.”	This is now applicant-committed measure 71 in Table App4-2g and has been combined with the draft EIS applicant-committed measure 134 referred to in this comment.

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11978-151	Magic Valley Energy, LLC	53. Appendix 4- App4-2m, #122 “Roadside ditches and culverts would be used to prevent ponding of runoff storm water and to minimize erosion of aggregate road base where needed. If culverts or drainage crossings are needed, they would be designed for a 25-year or greater storm frequency, without the development of a static head at the pipe inlet.“ The requirement to design culverts or drainage crossings without the development of a static head at the pipe inlet would cause unnecessary additional disturbance because of larger pipes and/or a greater number of pipes that would be needed to convey water flow, and is not typical for this type of engineering design. MVE requests this measure be updated to match the language in the POD, which already details MVE’s efforts to meet the BLM standards and those of cooperating agencies: “MVE will implement the applicable U.S. Army Corps of Engineers (USACE), Idaho Department of Water Resources (IDWR), and BLM standards (e.g., erosion and sediment control measures, culverts sized in accordance with USACE and BLM standards, etc.) for all road crossings or other work in wetlands or waters to ensure protection of water quality and to maintain the hydrology of affected areas.” “The roadway grade and culvert size should be balanced to avoid head and velocity damage.”	The measure was updated to reflect both the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]), which specifies the 25-year design, and the Stormwater Pollution Prevention Plan (Appendix D in MVE [2023]), which describes MVE’s efforts, as mentioned by the commenter.
11978-152	Magic Valley Energy, LLC	54. Appendix 4- App4-2m, #126 “Where practical, MVE would avoid altering existing drainage systems in sensitive areas such as erodible soils or steep slopes.” MVE requests an edit to the table to match the language in the POD: “Where practical, MVE would avoid altering existing drainage systems in sensitive areas such as erodible soils or steep slopes, with considerations given to such scenarios as road design and safety.”	Edits made as requested.
11978-153	Magic Valley Energy, LLC	55. Appendix 4- App4-2m, #127 “Where practical, access roads would be designed so that changes to surface water runoff are avoided and erosion is not initiated.” MVE requests an edit to the table to match the language in the POD: “Access roads will be designed so that changes to surface water runoff are avoided and erosion is not initiated. If changes to surface water runoff cannot be avoided, design features will be implemented to minimize impacts.”	Edits made as requested.
11978-154	Magic Valley Energy, LLC	56. Appendix 4- App4-2n, #135 “Scientifically rigorous avian and bat use surveys would be conducted; the amount and extent of ecological baseline data required would be determined by BLM. Full study plans and methodologies, as approved by the requisite state/federal agencies, would be implemented to characterize the existing resource conditions in the Project area.” This measure should be removed as biological studies, study plans, and methodologies have already been conducted and completed. Removing this measure will avoid any confusion with preconstruction requirements.	This applicant-committed measure has been removed from Table App4-2n.
11978-155	Magic Valley Energy, LLC	57. Appendix 4- App4-2n, #136 “Riparian areas would be avoided to the extent practical; however, full avoidance may not be practical.” MVE requests an edit to the table to match the language in the POD: “100-foot no-ground-disturbance buffer would be applied to all wetlands, streams, and riparian areas. If disturbance to such areas cannot be avoided, MVE would prepare site-specific plans and measures (e.g., erosion and sediment control measures, culverts sized in accordance with USACE and BLM standards, etc.) to mitigate impacts.”	Applicant-committed measure 136 in Table App4-2n has been deleted. This measure is duplicative of applicant-committed measure 136 in Table App4-2m.
11978-156	Magic Valley Energy, LLC	58. Appendix 4- App4-2n, #137 “A bird and bat conservation strategy and an environmental construction and compliance monitoring plan would be drafted to avoid and minimize effects to birds and bats.” The Construction Monitoring Plan (CMP; Appendix P) is more applicable here than the Environmental Compliance Monitoring Plan (ECMP; Appendix Q): “A bird and bat conservation strategy and a construction monitoring plan would be drafted to avoid and minimize effects to birds and bats.”	Added the Construction Monitoring Plan to the measure.
11978-157	Magic Valley Energy, LLC	59. Appendix 4- App4-2n, #138 “Turbines would be sited to minimize impacts to birds and bats through the following features: • No turbines would occur within 2.0 miles of an occupied golden eagle nest. • No turbines would occur within 1 mile of an occupied ferruginous hawk nest. • No Project infrastructure would occur on BLM-managed lands within 3.1 miles of greater sage-grouse leks in compliance with the BLM’s Approved Resource Management Plan Amendment, in order to minimize impacts to native sagebrush habitats. • The project would avoid conservation easements and protected lands. Wetlands and other waters would be avoided to the greatest extent practicable. No turbines would occur within 1,000 feet of irrigation canals to minimize impacts to bats and avian species attracted to such features.” MVE has actively removed turbines from within the stated buffers of known nest locations. To more accurately state this measure, MVE requests an edit to: “Turbines have been sited to minimize impacts to birds and bats through the following features: • All turbines were removed within 2.0 miles of an occupied golden eagle nest. • All turbines were removed within 1 mile of an occupied ferruginous hawk nest. • The Project layout was revised to remove all Project infrastructure on BLM-managed lands within 3.1 miles of greater sage-grouse leks in compliance with the BLM’s Approved Resource Management Plan Amendment, in order to minimize impacts to native sagebrush habitats. • The project has avoided conservation easements and protected lands. Wetlands and other waters were avoided to the greatest extent practicable. No turbines would occur within 1,000 feet of irrigation canals to minimize impacts to bats and avian species attracted to such features.’ [From POD Appendix M, Section 5.2:] “If new raptor nests were constructed in proximity to turbine corridors in the future, MVE will coordinate with BLM and USFWS about an appropriate course of action.”	As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), “The project’s final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. The project’s final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer.” Therefore, these changes to applicant-committed measure 138 in Table App4-2n would not be appropriate.

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11978-158	Magic Valley Energy, LLC	60. Appendix 4- App4-2n, #139 “Clearing of trees, native vegetation, or vegetated ground surfaces would occur outside the migratory bird nesting season (as listed in Table P-a1 in Appendix P of the POD), to the extent practicable. Vegetation clearing conducted during the nesting season would be done under the supervision of a compliance monitor to who would identify nests for avoidance prior to construction. Active nests would be marked/staked with the appropriate buffer and construction activities would not occur within the buffer until a biologist determines the nest is no longer active. When a nest is no longer active, nest marking sticks or flagging would be removed and the construction company notified that activities can resume.” MVE requests an edit to the table to match the language in the POD, where the full paragraph states the full intention: “Marked nests will be avoided during construction while the nest is active. Nests will be checked up to once per week to determine if they are still active. In some cases, nests can be checked from a distance by observing if a bird is present on a nest or if a bird is bringing food items to nestlings. Care will be taken to not flush the bird if at all possible. In other cases, nests may need to be checked at the nest and flushing of a bird may occur. Nests will not be approached if there are birds such as corvids in the vicinity (Martin and Geupel 1993); Environmental monitors will watch for predatory birds, which could indicate where nests are located. When a nest is no longer active, nest marking sticks or flagging will be removed and the construction company notified that activities can resume within the nest buffer.”	The measure as written accurately captures the nest identification and avoidance measures that MVE has committed to. Procedures for monitoring active nests during construction are described in the BBCS and do not need to be repeated here because they would not lead to a more informed analysis.
11978-161	Magic Valley Energy, LLC	63. Appendix 4- App4-2n, #151 “As part of MVE’s Eagle Incidental Take Permit, eagle fatality monitoring would be conducted by a qualified independent third- party who would provide all data from monitoring efforts directly to the Migratory Bird Permit Office.” This measure should match the terms agreed to by USFWS and as outlined in the POD: “As part of MVE’s Eagle Incidental Take Permit, eagle fatality monitoring would be conducted.”	This measure has been revised to read, “Eagle fatality monitoring would be conducted in accordance with the terms of MVE’s Eagle Incidental Take Permit.”
11978-162	Magic Valley Energy, LLC	64. Appendix 4- App4-2o, #162 “Foundations for turbines, transformers, met towers, substations, Operation and Maintenance facilities, and other above ground infrastructure would be removed to a minimum of three feet below surrounding grade and covered with soil.” MVE anticipates that the O&M buildings may not be at the end of its useful life at the time of decommissioning, and as described in L-3.7 of the POD the buildings may be sold or donated rather than demolished. MVE recommends either removing O&M facilities from Measure Number 162 or add a qualifying statement such as “Foundations for turbines, transformers, met towers, substations, decommissioned Operation and Maintenance facilities, and other above ground infrastructure would be removed to a minimum of three feet below surrounding grade and covered with soil.”	Applicant-committed measure 162 in Table App4-2o has been revised as requested and combined with measure 163 (see response to comment 11978-163 [see in Table A-3cc, Mitigation – EIS Appendix 4]).
11978-163	Magic Valley Energy, LLC	65. Appendix 4- App4-2o, #163 “Turbines, transformers, met towers, substations, Operation and Maintenance facilities, and other above ground infrastructure would be removed, as would buried infrastructure, such as the collector system or fiber optic cable, that is less than two feet below grade. (Cables buried more than two feet will remain in place.)” Measure Number 162 already addresses above ground infrastructure. MVE recommends revising Measure Number 163 to align with what is proposed in the POD Appendix L: “Underground cables buried less than two feet below grade will be removed, and cables buried more than two feet will remain in place.”	Measure 163 has been combined with applicant-committed measure 162.
11978-171	Magic Valley Energy, LLC	86. Appendix 4- Table App4-5, VII “Contribute funds to survey abandoned mines for bats and, if used, close with bat-friendly gates.” MVE Comment: MVE anticipates this measure will be removed in the FEIS based on comment 18 in this comment letter.	As described in the response to comment 11978-20 (see in Table A-3cc, Mitigation – EIS Appendix 4), the TAC will be responsible for evaluating postconstruction bat fatality monitoring results and for recommending compensatory mitigation measures when deemed appropriate.
11991-15	Julie Abo	Who is going to measure if the comparison of these potential measurements of sound and sight and physical impacts to birds, bats etc..and the actual outcomes? And what will happen if the negative impacts exceed the estimates of the DEIS and eventual EIS? Is there any means of ensuring these agreements have not been violated? This is not clear to me and I do not have confidence that such measurements will be taken nor LS Power would be held accountable to those measurements.	The mitigation measures described in EIS Appendix 4 (Mitigation) would be included in the terms and stipulations of MVE’s ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in measure oo, MVE’s compliance manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring.
11991-20	Julie Abo	Although the Programmatic Agreement attempts to address mitigation measures to resolve the negative impacts, it is not an acceptable resolution as the negative impacts persist. “Measures under the PA to minimize and mitigate adverse effects would range across a variety of approaches for historic properties including Minidoka NHS and WRC and other TCPs or Tribal resources. These measures would serve to address physical, non-physical (visual, auditory, atmospheric), and cumulative impacts to cultural resources. Potential measures could include monitoring and addressing post-review discoveries (see EIS Appendix 8).” (page 3-159) Cultural resources cannot be reconstituted once they are damaged or moved. They are completely irretrievable or able to be replaced. These cultural resources are part and parcel of the landscape and its spiritual and historical significance. It’s already been disturbed to perform this DEIS. “Power (2021) identifies 362 cultural resources in its study area. Of these cultural resources, 139 are in the physical APE.” (page 3-164)	The cultural resources in Power (2021) were identified through a Class I cultural resources inventory, which relies entirely on data obtained from previous archaeological investigations within the APE. Class III pedestrian cultural surveys would be required prior to BLM issuance of an NTP, if a ROW is grant is issued. These surveys use non-invasive methods that would not disturb cultural resources. Therefore, no disturbance to cultural resources has occurred, nor will disturbance to cultural resources occur as part of the surveys or as a result of the preparation of this EIS. Avoidance, minimization, or mitigation of historic properties would be implemented pursuant to the PA for the project and would be made conditions of ROW approval in the ROD. Further monitoring of cultural resources, as specified under the PA, is intended to ensure that historic properties are not inadvertently damaged during construction, post-review discoveries will be treated in accordance with the unanticipated discovery procedures described on page 19 of the draft PA (EIS Appendix 8). Where adverse effects to historic properties cannot be avoided, HPTPs describing site-specific mitigation measures will be prepared and included in the HPMP. Refer to pages 16–19 of the draft PA (EIS Appendix 8) for additional details.
12108-1	David Hickok	One of the biggest issues I have with the project is the shear number of birds and bats that will be killed including eagles and sage grouse. When I asked about the plan to minimize these loses, I was told that the wind farm would “miϴgate” these loses. However, the presenters could not tell me how these loses would be	As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B [Proposed Action]), “The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting

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		“miϴgated”. Does that just mean pay a fine or make sure the populaϴon is the same in 35 years as it is today? Reading the EIS Document did not add any details as to how this would happen. For this reason alone, the proposed wind farm should be stopped.	corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]).” Also see EIS Section 2.3.4 (Avoidance and Minimization) and the BBCS (Appendix M in MVE [2023]). Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). “Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project.” However, this section also notes, “This reduction may already be accounted for in the avian fatality estimates presented in Table 3.3-12 because the estimates are based on fatality averages across numerous existing wind energy facilities, and thus, may already account for variability in siting considerations (e.g., other wind facilities may have also sited their turbines to avoid known raptor nests)” and “Due to the degree of variability among species and among individual wind energy facilities, preconstruction avian use is a poor predictor of avian fatality rates observed following construction (WEST 2011). Therefore, it is difficult to predict fatality rates for individual avian species.” Due in part to the uncertainty in quantifying fatality rates prior to construction, mitigation measures include postconstruction avian fatality monitoring to assess actual avian fatality rates and determine which adaptive management measures need to be implemented to reduce fatalities (if any), as well as additional monitoring to assess the effectiveness of adaptive management measures and determine whether there are unresolved or residual impacts that warrant compensatory mitigation; see the BBCS (Appendix M in MVE [2023]) and EIS Appendix 4 (Mitigation) for additional details. This strategy is consistent with the USFWS’s land-based wind energy guidelines (USFWS 2012).
12130-12	Brenda Pace	Since future postconstruction fatality studies and mitigation are applicable to all bats that may use the Lava Ridge project area, this request may seem inconsequential. However, the interplay between decisions made in the DEIS and implementation of adaptive management through the Bird and Bat Conservation Strategy (BBCS) are flexible and may be subject to change over the lifetime of the project. I believe this presents a potential for exclusion of Townsend’s big-eared bats from future adaptive management and potentially important conservation action, which is unacceptable. Mitigation. Appendix 4 of the DEIS presents mitigation measures that will help to avoid, minimize, and mitigate adverse impacts of the Lava Ridge project. It is essential that all four of the mitigation types detailed in DEIS Appendix 4 (Table 4-1) be implemented for any action alternatives developed for the Lava Ridge project. This includes full incorporation of relevant measures into the Bird and Bat Conservation Strategy that will guide mitigation in the postconstruction timeframe.	See response to comment 12130-11 (see in Table A-3b, Bats). Postconstruction bat fatality monitoring will provide an opportunity to assess the fatality rates for all bat species, including Townsend’s big-eared bat, and determine whether adaptive management measures are needed to reduce fatalities. The mitigation measures listed in EIS Appendix 4 (Mitigation) would be required under all action alternatives and would be included in the terms and stipulations of the ROW grant, if issued. The BBCS (Appendix M in MVE [2023]) is a document prepared by MVE; additional mitigation measures for birds and bats that are not in the BBCS are listed in Table App4-4. As with other mitigation measures, these would be required under all action alternatives and would be included in the terms and stipulations of the ROW grant, if issued. Additional types of compensatory mitigation actions that would be considered are described in the Mitigation Framework for Birds and Bats in EIS Appendix 4.
12130-13	Brenda Pace	Applicant-Committed Measure #137 states that a Bird and Bat Conservation Strategy will be “drafted” but there is no indication it will be implemented. The same is true of #94 related to a “Historic Properties Treatment Plan for cultural resources. #137 also commits to “avoid and minimize” impacts to birds and bats but does not mention mitigation. These are semantic, but could present unacceptable loopholes. I recommend that they be reworded.	The BBCS and HPTPs are required documents that must be approved by the BLM Authorized Officer prior to issuance of an NTP, if a ROW is granted. As described in the response to comment 12130-12 (see in Table A-3cc, Mitigation – EIS Appendix 4), all mitigation measures (which include avoidance and minimization measures) listed in EIS Appendix 4 (Mitigation) would be required under all action alternatives and would be included in the terms and stipulations of the ROW grant, if issued. Thus, all of the plans that would be drafted would be implemented.
12130-15	Brenda Pace	Applicant-Committed Measure #153 describes employee training on how to handle dead or injured birds or bats. In addition to being held every three years, as indicated, I recommend that this training should be mandatory for all new hires.	Additional project-specific measure pp requires training for all new hires.
12130-16	Brenda Pace	Applicant-Committed Measure #160 appears to be a voluntary preemptive curtailment strategy that will save the lives of some birds and bats. I commend MVE for implementing this measure as long as it is put into practice at the beginning of turbine operations and not just as a curtailment strategy to be implemented after postconstruction fatality surveys are completed.	Applicant-committed measure 160 states that turbine blades will be feathered when wind speeds are below the manufacturer’s cut-in speed (i.e., the speed at which wind turbines begin generating electricity). As described in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B [Proposed Action]), this type of feathering is not considered “curtailment” because it does not reduce the power generated by the turbines. Curtailment is defined as feathering turbine blades when wind speeds exceed the manufacturer’s cut-in speed because it reduces (or curtails) the power generated by the turbines.
12130-17	Brenda Pace	Additional Mitigation Measure “n” describes postconstruction avian and bat fatality monitoring. Based on long term research on bat activity at the Idaho National Laboratory on the northeastern Snake River Plain (DOE-ID 2018), I recommend that the timing of bat surveys should coincide with a minimum timeframe of April through September, when bats are most active in the region. Furthermore, I recommend that within this active period, it is essential that surveys be completed on a weekly basis, and on a bi-weekly basis during the Fall migration period in August and September (Kunz et al. 2007, Smallwood 2020). I recommend that searcher efficiency and carcass persistence trials must also be completed per standard guidelines (USFWS 2012, WDFW 2009, WGFD 2021). I recommend that reports must be prepared and shared with the BLM, IDFG, USFWS, local and regional bat biologists and researchers, and provided or at least summarized for inclusion in public data archives.	The BBCS in Appendix M of MVE (2023) has been updated to include an Avian and Bat Postconstruction Monitoring Plan that provides a more detailed description of the protocols that would be implemented and clarifies the responsibilities of the TAC, which include determining the appropriate interval for carcass searches. EIS Appendix 4 (Mitigation) has also been updated as needed to reflect the changes in the BBCS and to provide additional details on the TAC; see applicant-committed measure 150 and additional measures u, w, y, aa, and mm.
12130-18	Brenda Pace	Additional Mitigation Measure “o” describes consultation necessary to determine the best strategies to minimize impacts found during postconstruction fatality surveys and implement adaptive management. The acronyms “BCI” and “TAC” are not defined, but in this context, they likely refer to “Bat Conservation International” and a “Technical Advisory Committee.” I strongly support this requirement to establish a “TAC” for broadening the group that will review post?construction fatality data and recommend mitigations for bats and birds. I recommend that the BLM consider including wildlife biologists from Craters of the Moon National Monument and Minidoka National Wildlife Refuge, Idaho Universities (including the Intermountain Bird Observatory), and the Idaho Bat Working Group (Rita Dixon and Bill Doering, POCs), and East Idaho Bat Collaborative (David Dressel POC).	See response to comment 12130-17 (see in Table A-3cc, Mitigation – EIS Appendix 4); EIS Appendix 4 (Mitigation) has been revised to include additional details on the TAC. As described in additional project-specific measure mm, the TAC will consist of resource specialists from the BLM, USFWS, OSC, and IDFG. The TAC will be responsible for continually re-evaluating the potential impacts to avian and bat species based on the results of postconstruction fatality monitoring, the latest publicly available data and literature on avian and bat populations, and the potential impacts of wind energy development on these species to determine which adaptive management or compensatory mitigation measures should be implemented to reduce fatalities, if any.

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		These individuals will provide essential unique perspectives on bats and birds to establish meaningful thresholds for fatality, implement mitigation strategies, and ensure that adaptive management is employed for the life of the Lava Ridge Wind project.	
12130-19	Brenda Pace	Additional Mitigation Measure “s” describes continued acoustic monitoring for bat use of the Lava Ridge Wind project area to inform adaptive management. To be most useful for this application, I recommend that this acoustic monitoring must continue through the proposed two years of postconstruction fatality monitoring and on a less frequent, systematic basis for the life of the project.	Additional project-specific measure aa was revised to clarify that the BLM Authorized Officer (in consideration of the TAC’s recommendations) would determine the duration of the surveys.
12130-20	Brenda Pace	Additional Mitigation Measure “v” describes winter road maintenance relative to big game winter use of the Lava Ridge project area. In this context, I recommend that periodic breaks be created in the snow banks along plowed roads to allow for escape routes for big game.	The final EIS has been revised to include additional project-specific measure ii, which requires that gaps at least 100 feet wide be left in snow berms at least every 1/4 mile to accommodate big game movement.
12130-21	Brenda Pace	Additional Mitigation Measure “eee” addresses wildlife entrapment specifically related to vertical pipes and birds. I recommend that this measure be expanded to include mitigation measures (ramps) to prevent wildlife entrapment in new and existing livestock troughs and open water storage tanks (Anderson et al. 2021).	BLM-required measure T requires MVE to “Install ramps in new and existing livestock troughs and open water storage tanks to facilitate the use of and escape from troughs by greater sage-grouse and other wildlife,” as required by BLM (2015). Also, the final EIS was revised to include additional measure ffff, which requires the use of escape ramps in open trenches.
12130-22	Brenda Pace	Compensatory mitigation is addressed in the DEIS Appendix 4 (Table 4-5). I recommend implementation of all the mitigation measures outlined in this Table. Regional wildlife biologists from Craters of the Moon National Monument and Minidoka National Wildlife Refuge and active researchers from Idaho universities and bat/bird organizations like the Intermountain Bird Observatory, Idaho Bat Working Group, and SE Idaho Bat Collaborative, would be in a unique position to understand research and management needs for birds and bats. I recommend that these individuals and groups be consulted to tailor compensatory mitigation measures for the Lava Ridge Wind project. Based on my own experience, I recommend that measures related to research on bat maternity colonies (Call et al. 2018), bat, bird and insect tracking with Motus nanotechnology and towers (Taylor et al. 2017), bat guano analysis (DNA, carbon isotope) to aid in population estimates, habitat use, and diet (Scholz and Voight 2022), and baseline studies of bat insect prey (e.g., light trapping, DNA and stable isotope analyses of moth wings collected from bat roosts) (Walker et al. 2016).	EIS Appendix 4 (Mitigation) has been revised to include additional details on the TAC. As described in additional project-specific measure mm, the TAC will consist of resource specialists from the BLM, USFWS, OSC, and IDFG. The TAC will be responsible for continually reevaluating the potential impacts to avian and bat species based on the results of postconstruction fatality monitoring and the latest publicly available data and literature on avian and bat populations and the potential impacts of wind energy development on these species to determine which adaptive management or compensatory mitigation measures should be implemented to reduce fatalities, if any. The compensatory mitigation measures presented in the Mitigation Frameworks in EIS Appendix 4 are examples of the types of mitigation that the TAC may recommend but do not represent an exhaustive list since new science and technologies will be developed over the 30-year operation phase.
12130-29	Brenda Pace	In BBCS Section 6.1, there is no indication of when postconstruction fatality surveys are to be conducted for birds and bats. Following published standards (Kunz 2007, USFWS 2012, WGFD 2021), I recommend that bird fatality surveys be conducted on a year-round basis and that bat fatality surveys be conducted from April through September, or possibly even longer from March – October. Additionally, Section 6.1 defines the search interval for all postconstruction fatality surveys as a “minimum of 14 days.” While this may be suitable for large raptors, as required by USFWS consultation for the Lava Ridge project Eagle Take Permit, it is not suitable for small birds or bats (Kunz 2007, Smallwood 2020). Following the published standards, I recommend that bat surveys be conducted weekly from April to August and biweekly in August and September. Small bird 10 surveys should also be more frequent than the 14-day minimum in the Spring, Summer and Fall seasons.	The BBCS in the final EIS has been updated to include an Avian and Bat Postconstruction Monitoring Plan that provides a more detailed description of the protocols that would be implemented and clarifies the responsibilities of the TAC, which include determining the appropriate interval for carcass searches. EIS Appendix 4 (Mitigation) has also been updated as needed to reflect the changes in the BBCS and to provide additional details on the TAC; see applicant-committed measure 150 and additional measure mm.
12130-30	Brenda Pace	Section 6.5 describes yearly reporting on postconstruction fatality monitoring and review by USFWS, BLM, and IDFG. I recommend that these reports be prepared in a manner that will allow them to be shared with the public and to open access databases such as the American Wind Wildlife Institute’s documents library (https://awwic.nacse.org/), where they can be used to better understand how wildlife interacts with wind energy.	The Bird and Bat Conservation Strategy (Appendix M in MVE [2023]) protocols will be finalized in coordination with the TAC and could include sharing reports via open access databases such as the American Wind Wildlife Institute’s documents library (https://awwic.nacse.org/). The TAC would include resource specialists from the BLM, OSC, USFWS, and IDFG.
12130-33	Brenda Pace	• Applicant-Committed Measure #157 outlines vague thresholds for bird and bat fatalities that will likely result in no adaptive management to address fatalities.	While the draft EIS noted that consultation with the TAC would be necessary to determine the best minimization strategy for the species occurring in the area, the final EIS has been revised to include additional details on the role of the TAC (see additional measures w, y, and mm) and the thresholds that would trigger an adaptive management response (see additional measures w and nn).
12130-34	Brenda Pace	• Applicant-Committed Measure #150 describes a long-term postconstruction survey protocol for detecting large-bird carcasses that is unsuitable for small birds or bats.	See response to comment 12130-29 (see in Table A-3cc, Mitigation – EIS Appendix 4).
12130-36	Brenda Pace	In addition, per my comments above on “Additional Mitigation Measure ‘o’” (DEIS Appendix 4, Table 4-4), I recommend that a “Technical Advisory Committee” be established to review post?construction fatality data and implement mitigation and adaptive management along with USFWS, BLM, and IDFG. Membership on this TAC should be inclusive of local wildlife biologists, University personnel, and other knowledgeable individuals from the Idaho Bat Working Group and East Idaho Bat Collaborative. While I have the deepest respect for USFWS, BLM and IDFG personnel, I believe it is essential to balance the perspectives and interests of these parties with up-to-date local knowledge and expertise.	EIS Appendix 4 (Mitigation) has been revised to include additional details on the TAC. As described in additional project-specific measure mm the TAC will consist of resource specialists from the BLM, USFWS, OSC, and IDFG. The TAC will be responsible for continually reevaluating the potential impacts to avian and bat species based on the results of postconstruction fatality monitoring and the latest publicly available data and literature on avian and bat populations and the potential impacts of wind energy development on these species to determine which adaptive management or compensatory mitigation measures should be implemented to reduce fatalities, if any.
12226-1	Ted Deetz	EIS Section 3.17.1.4 Compensatory Mitigation states that “MVE would develop and implement a hazardous materials management plan”. Comment: I guess BLM has to approve the plan before they see it? A plan for prevention must be determined before approval. I say this because I have been down this road as a member of the PWSD. If it is not clearly covered before approval it will never be implemented. If the prevention plan is not covered before approval, just small tokens of mitigation and a lot of “rubber stamped paperwork” is all that will happen. The only other mention of the effects on the ESPA I could find is in AIB46 and AIB49 and there is no discussion of the long term effects on ESPA.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). All plans would have to be approved by the BLM prior to construction notice to proceed.

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12338-10	National Park Service	Section: Appendix 4 (Mitigation) Page: App 4-4 The NPS recommends inclusion of clear facility lighting specifications for minimized uplight (e.g., full cut-off, uplight rating 0), and minimized blue light (e.g., <3000k correlated color temperature) for Measure 23 in Table App 4-2c.	The BLM would not authorize construction notice to proceed until MVE provides a final POD; MVE (2023) includes MVE's project plans as of December 2023.
12338-11	National Park Service	Section: Appendix 4 (Mitigation) Page: App 4-15, Table App 4-2l The NPS appreciates the dust mitigation measures incorporated in tables 4-2 (applicant committed mitigation measures for dust) and 4-3 (BLM-required mitigation measures) of appendix 4. The NPS recommends the following additional dust mitigation measures are added to this list: (1) Require real-time air quality monitoring at least during construction to ensure the effectiveness of dust mitigation and to determine whether long-term monitoring is necessary. (2) Identify potential high use access roads and include specific paving requirements. This recommendation is partially addressed under construction requirements by noting that the applicant will "Identify potential high use access roads and consider paving requirements." (3) Require paving for high-use, long-term parking and staging areas. (4) Require the application of gravel or acrylic polymer for unpaved parking and staging areas with high dust emission potential (e.g., exposed soils, high silt content). (5) Require mulch for exposed or disturbed areas that are not suitable for gravel with high dust emission potential (e.g., exposed soils, high silt content). (6) Require the use of natural or manmade wind breaks at large construction sites and staging areas where ongoing dust emissions are occurring to minimize particle entrainment at the site. (7) Provide specified training activities for company employees and contractors on dust mitigation strategies.	The BLM would not authorize construction notice to proceed until MVE provides a final POD; MVE (2023) includes MVE's project plans as of December 2023.
12338-12	National Park Service	Section: Appendix 4 (Mitigation) Page: App 4-15 The NPS appreciates the incorporation of Measure #116 in Appendix 4, Table App 4-2l (on page App 4-15) to protect air quality. The NPS recommends including additional detail in Measure #116 to ensure the mitigation measure is effective. For example, the measure should identify what monitoring would be employed and what thresholds would be used to determine acceptable/unacceptable levels of dust.	The BLM would not authorize construction notice to proceed until MVE provides a final POD; MVE (2023) includes MVE's project plans as of December 2023.
12465-3	Regina Smith	The mere term carcasses defines it all. They have already counted the carcasses from other projects, and they have predicted numbers, but they offer no real mitigation, yet throughout the document they claim there will be no significant impacts. The few avoidances or minimizing steps presented are preferenced with "if cost-effective" or "if feasible". These are loopholes not mitigation. ... If actual mitigation of impacts cannot be developed before the project, counting carcasses afterwards is useless.	As stated in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B [Proposed Action]), "The project has been sited outside of major flyways for migratory birds; features that concentrate raptor migration (such as prominent ridgelines) are not present. In coordination with the BLM and USFWS, MVE has adjusted the siting corridors to avoid or minimize the placement of infrastructure in areas known to be occupied by avian species of concern (e.g., golden eagle [Section 3.3.3] and greater sage-grouse [Section 3.3.4]) (see EIS Section 2.3.4, Avoidance and Minimization, and Appendix M of MVE [2023]). Turbines have been sited to reduce the risk of avian collisions (applicant-committed measures 136 and 138 to avoid occupied golden eagle and ferruginous hawk nests and to avoid riparian areas and wetlands to the extent practicable). Proper facility and turbine siting can lead to lower avian fatality rates, as would be expected for the Lava Ridge Wind Project." The draft EIS presented a range of different adaptive management and compensatory mitigation measures as examples of the measures that the TAC may recommend based on the best currently available scientific data and literature. EIS Appendix 4 (Mitigation) has been revised to include additional details on the TAC. As described in additional project-specific measure mm, the TAC will consist of resource specialists from the BLM, USFWS, OSC, and IDFG. The TAC will be responsible for continually re-evaluating the potential impacts to avian and bat species based on the results of postconstruction fatality monitoring and the latest publicly available data and literature on avian and bat populations and the potential impacts of wind energy development on these species to determine which adaptive management or compensatory mitigation measures should be implemented to reduce fatalities, if any. As described in EIS Section 3.3.2.2.2, additional monitoring would be required to assess the effectiveness of adaptive management measures.
12538-3	Clarke Kido	I cite the observations, analyses, and conclusions of the draft EIS as part of my basis to oppose the project. · Section 3.5.3 says "The Japanese American community has expressed that no mitigation of project impacts could protect the site from the intrusion and desecration of, what to the community is considered, a sacred site." · Section 3.5.5.3 says "An irreversible effect on cultural resources could occur under all action alternatives where the project does not avoid physical impacts to cultural resources." · Section 3.5.6.3 says "Long-term effects (visual and auditory impacts) on the preservation of cultural resources would persist until operations cease and the aboveground infrastructure is removed. This would include related irreversible effects to significant cultural resources of the Japanese American community and of Native American Tribes." · Section 3.6.2.3 says "Japanese American communities and Native American Tribes would be subject to disproportionately high and adverse long-term irretrievable effects from increased noise, changes to the visual character and inherent scenic quality of the analysis area, and non-physical impacts to cultural resources. Comments on Compensatory Mitigation · Appendix 4, Table App4-5 says "Implementation of [compensatory mitigation] measures XIV and XV would not directly reduce any project-related effects but would aim to compensate for project-related effects indirectly by funding studies which are desired by the Japanese American community and Native American Tribes." My comment is that measures XIV and XV are token attempts to appease the affected parties. The proposed ethnographic studies, while desired, cannot begin to offset the physical, cultural and emotional damages that will last for the 30+ year lifespan of the project, perhaps forever. · Appendix 4, Table App4-5 says "Measure XVI: MVE would establish a fund to be used based on recommendations from a committee that would be established and comprise Minidoka NHS stakeholders with an emphasis on including representatives of Japanese American organizations. Recommendations from the committee would focus on enhancing the fundamental values of Minidoka NHS so that it will continue to provide opportunities for commemoration and healing through pilgrimages and provide opportunities for bettering humanity as a site of conscience. Recommendations from the committee may include but are not limited to the following: o Establishing	The mitigation measures referenced in EIS Appendix 4 (Mitigation) have been revised. See the "Mitigation Framework for Key Resources and Values Associated with Minidoka National Historic Site" in EIS Appendix 4. Also see responses to comments 9080-15 (see in Table A-3cc, Mitigation – EIS Appendix 4) and 11782-5 (see in Table A-3cc, Mitigation – EIS Appendix 4).

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		conservation easements to preserve the visual character of the surrounding landscape o Removal of existing visual intrusions within close proximity to Minidoka NHS that take away from meeting its fundamental values o Increasing access to pilgrimages and educational materials that provide a better understanding of the history associated with Minidoka NHS" My comment is that I need more information to judge the merits of mitigation measure MVI.	
12859-43	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Mitigation. While we appreciate BLM's efforts to minimize damage to Minidoka's cultural and historic values, Alternatives C and E have "disproportionately high and adverse impacts to the Japanese American community and Native American tribes."270 This proposed wind project suffers from intrusive viewshed impacts to Minidoka National Historic Site BLM must follow the mitigation hierarchy in evaluating those impacts. The DEIS does not adequately identify mitigation measures that would offset the disproportionate adverse impacts. As noted above, these Alternatives do not conform with requirements in the BLM's Monument Resource Management Plan (RMP) to preserve Japanese American Traditional Cultural Property (TCP) and other cultural values.	See response to comment 11557-4 (see in Table A-3g, Cultural Resources and Native American Concerns).
12927-3	John Arkoosh	The DEIS talks about applicant committed measures and compensatory mitigation but does not define in any detail what these will consist of. The DEIS is woefully insufficient in terms of mitigation strategies, such strategies must be clearly and completely defined before any build alternative is permitted.	More detail was added to EIS Appendix 4 (Mitigation), which has a complete list of mitigation measures and a definition of each type of mitigation. Additional details can be found in the various plans attached to MVE (2023) and the other sources cited throughout this appendix.
12934-4	Rob Thornberry, Theodore Roosevelt Conservation Partnership	Strengthen compensatory mitigation language. In Figure 3.18.2.4, the language regarding compensatory mitigation for the effects of the project on big game migrations is vague, and therefore meaningless. For example, the language currently says: "If postconstruction carcass monitoring (mitigation measure VII), IDFG telemetry data, and/or annual winter counts indicate impacts to big game or avoidance of the area by big game, then consider the following …" The existing language offers no assurance the applicant or BLM will take action to implement effective mitigation measures for functional loss of pronghorn habitat that is likely to impact the Owinza herd. The phrasing should include measurable thresholds and concrete actions the applicant will undertake to fulfill its mitigation obligations to address unavoidable adverse impacts, should they occur. In a draft of the pronghorn management plan currently out for public comment, the IDFG identified six goals. The first three goals are: (1) Improve the quality of pronghorn population monitoring data to better estimate population size and understand population trends; (2) collaborate with private landowners, land management agencies, and others to incorporate measures in land use and resource management plans that benefit pronghorn habitat; and (3) increase knowledge of pronghorn survival, habitat use, genetics, and other factors affecting pronghorn populations, movements, and migrations. The applicant and BLM should consider language within the proposed plan to address the needs of pronghorn as stated by the IDFG.	An additional mitigation measure (measure mm) described in EIS Appendix 4 (Mitigation) describes the establishment and responsibilities of a TAC. The TAC will be established to determine the need for avoidance, minimization, adaptive management, and compensatory mitigation (including for big game) for the life of the project, and will consist of resource specialists from the BLM, USFWS, IDFG, and OSC. The TAC will be responsible for reviewing monitoring results and identifying the impact thresholds over which compensatory mitigation would be required, as well as identifying specific actions for compensatory mitigation.
12966-3	Ted Deetz	EIS Section AIB46 states that "MVE would develop and implement a hazardous materials management plan". Comment: Again, plans should be developed prior to approval. There is no mention of the long term effects on the ESPA. The supposed plan will only address Storage, Use, Transportation and Disposal of hazardous materials and no mention of prevention of hazardous materials such as the tons of ammonium nitrate fuel residue that is forced into the basalt and surrounding environment. This is not a "Green Project".	All plans would be approved by the BLM prior to an NTP, not before the ROD.
12982-13	Jerry Taylor	The DEIS cavalierly projects significant impacts on federally protected avian species and species of concern, and suggests future mitigation would make up for habitat loss and/or projected "take" (i.e. death} of significant numbers of individuals from several protected species. The company(s) are allowed to promise avoidance "to the extent feasible", or promise "mitigation compensation" to buy the agencies and stake holders off with promises of future investment in habitat improvement elsewhere, etc. This is a joke, and BLM knows it or should know it. Sagebrush/grass habitat is being lost every year at an alarming rate due to wildfire, cheatgrass invasion, and encroachment from development in the urban interface and on dispersed private wildlands. There is no more land to buy in reality that would offset the amount lost every year. Habitat improvement is a drop in the bucket compared to the overall decline. So "Mitigation Compensation" in the way of payments to government agencies to go forth and do good work to offset significant impacts is an exercise in futility. There was a time when BLM put restrictions on building projects within a mile of a single eagle nest, that might fledge and eaglet or two in a good year. The same is true for sage grouse leks, and critical habitat. Now the government agencies seem to be willing to allow them to be slapped from the sky with impunity and in great numbers. Bold statements of "take" (mortality) in consultation with BLM, USFW, etc. How things have changed and not for the better. BLM should reject pie in the sky promises of future mitigation and do proper analysis of impacts up front.	The analysis in EIS Chapter 3 (Affected Environment and Impacts) discloses the need for mitigation measures to avoid or minimize impacts to special-status avian species from turbine collisions as well as the potential that adaptive management measures (including curtailment) and compensatory mitigation (including studies of the geographic origin of fatalities) may be necessary to further reduce or offset the remaining impacts. A complete list of required mitigation measures is provided in EIS Appendix 4 (Mitigation); this includes MVE's applicant-committed measures as well as additional measures required by BLM policy, additional project-specific mitigation developed by the BLM to address impacts that have not been sufficiently minimized by MVE's applicant-committed measures, and potential compensatory mitigation measures. Compensatory mitigation options are not limited to the acquisition of conservation easements or funding habitat restoration projects; the TAC would be responsible for recommending the most appropriate compensatory mitigation measures for the project, based on the results of postconstruction monitoring and the best available science and technology available at that time (see additional measure mm). This would include recommending appropriate mitigation ratios to ensure that residual impacts are adequately offset. Compensatory mitigation for greater sage-grouse must meet the requirements established in BLM (2015a). It is the USFWS's jurisdiction to make the decision on MVE's eagle ITP and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines. All mitigation measures described in EIS Appendix 4 would be included in the terms and stipulations of MVE's ROW authorization, if granted. The Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describes procedures for monitoring and enforcement of mitigation measures. As described in measures nn and oo, MVE's Compliance Manager would be required to submit annual reports to the TAC, the BLM, and other relevant agencies documenting compliance with required mitigation measures and the results of any required monitoring. As described in EIS Section 3.3.3.2.2 (Eagles, Alternative B [Proposed Action]), there are no eagle nests within 2.5 miles of the siting corridors. MVE has also committed to additional preconstruction surveys to identify new raptor nest locations and to establish the status of previously identified raptor nests (applicant-committed measure 146). Avoidance buffers and additional mitigation measures would be required if any new eagle nests are detected; see applicant-committed measures 138, 140, and 144. Greater sage-grouse leks were considered in early project design and the siting corridors were adjusted to avoid placement of infrastructure within 3.1 miles of known leks. A number of additional mitigation measures for

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			greater sage-grouse, including activity-specific avoidance buffers and timing requirements, would be implemented as described in EIS Section 3.3.4.2.2 (Greater Sage-Grouse, Alternative B [Proposed Action]).
12993-1	Jim Meeks	In the Lava Ridge wind project draft environmental impact statement: Volume 3 appendix 4 "Mitigation" table app 4-2f; 44-66: The reduction of available grazing acres coupled with the wind river project proposed "fencing" is a death threat to grazing animals from range fires. It is also guaranteed bankruptcy for the grazer producers. Seriously, there is no viable or affordable alternative for other food sources (hay or alternate pastures) for the grazer producers. The draft prescribed "mitigation" for such is dishonest.	See responses to comments 11204-13 and 11204-19 (see in Table A-3p, Livestock Grazing) and 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
13003-7	Lynden Osborne	As stated in App3-14 Vegetation AIB-41, Vegetation will be rehabilitated... 'to the greatest extent feasible". In the end who will determine what feasible means?	AIB-42 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief), describes that MVE would be required to consult with the BLM when determining where avoidance of environmentally sensitive areas would be feasible. As described in EIS Section 3.15.1.2.2 (Native Upland Vegetation Communities, Alternative B [Proposed Action]) MVE would be required to purchase a reclamation bond prior to construction and would be held to BLM-approved reclamation success criteria. These success criteria are described in Section E-2.2 in the Reclamation Plan (Appendix E in MVE [2023]). The final EIS has been revised to include additional details on the reclamation bond; see applicant-committed measure 164 in EIS Appendix 4 (Mitigation).
13006-2	Leon Smith	3) Recommend that BLM modify the DEIS to identify more compensatory mitigation for cultural resources, treaty rights and environmental justice issues. Recommend BLM modify the DEIS to include acquiring land as mitigation at a higher rate than the loss to account for the impacts, in addition to other possible treaty rights mitigations, and outline the timeframe and a mechanism to acquire the land.	Some of the mitigation measures in EIS Appendix 4 (Mitigation) and EIS Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities) related to environmental justice and cultural resources have been revised. Due to the ongoing nature of Section 106 and government-to-government consultation, which are key drivers in identifying potential impacts and determining appropriate forms of avoidance, minimization, and mitigation for cultural resources and environmental justice populations, more specific compensatory mitigation measures cannot be determined at this time. Also see response to comment 11661-6 (see in Table A-3h, Environmental Justice and Socioeconomics) regarding Tribal Treaty Rights.
13006-8	Leon Smith	10) If the project goes forward against the strong objection of the subcommittee, the BLM should include a specific process to acquire conservation easements to preserve adjacent private lands in the compensatory mitigation section to ensure that mitigation is durable/effective.	The acquisition of conservation easements would be considered as a potential compensatory mitigation measure as described in the Mitigation Frameworks in EIS Appendix 4. The BLM Authorized Officer will determine final compensatory mitigation measure requirements based on recommendations from the TAC (for biological resources) and a committee of Minidoka NHS stakeholders (for impacts to Minidoka NHS and the Japanese American community). The final EIS has been revised to provide additional details on the TAC and compensatory mitigation plans.
13006-16	Leon Smith	7) Recommend a preemptive seasonal curtailment strategy to reduce bat mortality, rather than waiting for high mortality to start curtailment.	As stated in applicant-committed measure 160, MVE would feather turbine blades when wind speeds are below the manufacturer's cut-in speed (i.e., the speed at which the turbine begins generating electricity). Although this is not considered curtailment because it does not reduce the power generated by the turbines, it would provide a means for pre-emptively reducing bat fatalities because it prevents turbines from rotating rapidly at low wind speeds, when bats are most active. As described in EIS Section 3.3.1.2.2 (Alternative B [Proposed Action]), the need for a curtailment strategy would be determined based on the results of postconstruction avian and bat fatality monitoring; if a curtailment strategy is implemented, it would be tailored to the periods and locations of peak risk for bats, as determined by the TAC. The final EIS has been revised to include additional information on the responsibilities of the TAC and the thresholds that would trigger an adaptive management response; see additional measure mm.
13006-19	Leon Smith	10) Recommend BLM add more detail to the DEIS regarding mitigation measures for wildlife with consideration of long-term displacement impacts and irreversible/irretrievable losses that cannot be mitigated.	Impacts to wildlife, including displacement, and the measures that would be implemented to minimize or avoid those impacts are described in EIS Section 3.18 (Wildlife). Irreversible and irretrievable impacts are also disclosed in this section, and compensatory mitigation measures to offset these impacts have been recommended, where warranted. The final EIS has been revised to include additional details on compensatory mitigation, including the Mitigation Framework for Big Game (EIS Appendix 4).
13006-20	Leon Smith	11) Recommend BLM consult with IDFG and NPS bat experts locally to craft specifically tailored fatality thresholds that would lead to operational curtailment and compensatory mitigation for bats in this region, as well as other species.	EIS Appendix 4 (Mitigation) has been revised to include additional details on the TAC. As described in additional measure mm, the TAC will consist of resource specialists from the BLM, USFWS, OSC, and IDFG. The TAC will be responsible for continually re-evaluating the potential impacts to avian and bat species based on the results of postconstruction fatality monitoring and the latest publicly available data and literature on avian and bat populations and the potential impacts of wind energy development on these species to determine the adaptive management or compensatory mitigation measures that should be implemented to reduce fatalities, if any.
13008-5	Scott Hauser	Appendix I, Blast Plan Methodology (section 1-6) makes no mention of taking wildlife health and protection into account. This raises concerns and many questions. USRT suggests enacting an environmental protection plan for wildlife, specifically birds. Sage-grouse leks and other important bird species may be at risk from blasting and construction operations. USRT suggests avoiding blasting during nesting periods or verifying that blasting will occur far enough away to not disturb nesting birds.	The project has been designed to avoid greater sage-grouse leks and species-specific construction avoidance measures, including species-specific avoidance buffers for active bird nests and sage-grouse leks, where construction avoidance buffers may not be sufficient to prevent impacts from blasting, additional blasting-specific avoidance buffers have been established; see, for example, additional measure m that prohibits blasting in the nest buffers of all BLM special-status birds as outlined in IDIB-2020-014 (BLM 2020a). A complete list of mitigation measures is provided in EIS Appendix 4 (Mitigation).
13008-10	Scott Hauser	The diurnal raptors section states, "The likelihood of collision is highly variable and dependent upon the interaction of site location, season, and species-specific behaviors." The DEIS leaves questions as to how this variability will be dealt with. Are there plans to monitor this, and determine if Lava Ridge is going to have an impact on the raptor population? What mitigation efforts will be made to rectify a high likelihood of collisions within the Lava Ridge Project?	EIS Section 3.3.2 (Avian Populations), EIS Section 3.3.3 (Eagles), and EIS Section 3.3.4 (Greater Sage-Grouse) describe the mitigation measures that would be implemented to minimize, avoid, or offset impact to avian species, including raptors. The mitigation measures include a minimum of 2 years of postconstruction avian fatality monitoring (see applicant-committed measure 150). Additional details are provided in the GRSG Mitigation Plan (Appendix U in MVE [2023]), BBCS (Appendix M in MVE [2023]), and Eagle Conservation Plan (Appendix T in MVE [2023]) as well as EIS Appendix 4 (Mitigation).

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13015-1	Diane Meeks, Jim Meeks	In the Lava Ridge Wind Project Draft Environmental Impact statement: Volume 1, Chapter 3.3.1.4 states that only with the final EIS ..."Final residual impacts and compensatory mitigation plan would be required..." We say no until a complete "Final and detailed "mitigation" draft is issued for our review.	The final EIS has been revised to include additional details on compensatory mitigation requirements and resource-specific mitigation plans have prepared as appropriate and included in the appendices to the final EIS. These types of plans are not required for a ROD but would have to be approved by the BLM prior to any potential NTP.
1325-1	Mike Gerrity	I support efforts to reduce the killing of birds. Please consider mitigating bird deaths by trapping feral cats. Cats kills billions of birds every year.	Although contributing funds to programs that spay and neuter stray or feral cats was not specifically listed as a potential compensatory mitigation measure in the EIS, the TAC will be responsible for evaluating the result of postconstruction avian fatality monitoring and recommending adaptive management and compensatory mitigation measures based on the best available scientific data and literature (see additional project-specific measure mm).
24-1	Timothy Ekeberg	Permanent scarring of the lands will occur even after the so called decommissioning. If and very likely when most of these companies cease to exist the taxpayers will be held to pay for decommissioning this project. There are numerous studies showing the regular failure across our Nation and other Nations of these wind generators because the cost to do proper maintenance and upgrade them are not only extremely costly that requires extremely expensive and specialized equipment and crews to do the maintenance and upgrades. This destroys projected returns on investment. These maintenance and upgrades are grossly under estimated by the company trying to sell this project.	As described in in applicant-committed measure 164, “MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria.” The final EIS has been revised to include additional details on the reclamation bond; see applicant-committed measure 164.
2915-6	Roger Twitchell	who specifically would have the authority to implement the mitigation measures such as feathering? Could MVE or their customers veto implementation of mitigation measures? Who would be the final arbiter and what time frame would be needed to implement a mitigation measure when needed?	The mitigation measures listed in EIS Appendix 4 (Mitigation) would be required under all action alternatives and would be included in the terms and conditions of the ROW grant, if issued. The BLM Authorized Officer has the authority to enforce the terms of the grant and take punitive actions, including cancellation of the ROW grant, if MVE fails to comply with those terms. The BLM Authorized Officer may modify the ROW grant at any time to include new or revised terms and conditions, as warranted. A complete list of required mitigation measures is provided in EIS Appendix 4, which includes details on monitoring and reporting requirements, as well as potential adaptive management and compensatory mitigation measures. The TAC would be responsible for regularly evaluating postconstruction monitoring and compliance reports and advising the BLM Authorized Officer on appropriate adaptive management and compensatory mitigation measures for biological resources. The final EIS has been revised to include additional details on the TAC and their responsibilities; see additional project-specific measure mm. A committee of Minidoka NHS stakeholders would be established to provide recommendations to the BLM Authorized Officer for compensatory mitigation measures to address impacts to Minidoka NHS and the Japanese American and Minidoka-connected communities.
2920-3	Regina Smith	The compensatory mitigation (3.6.3.4, pg. 3-223) is "There would be no residual effects..." I maintain the project itself will be a residual effect.	There would be no residual effects to community services, employment, and housing availability that would require compensatory mitigation because “[t]he project would not have irreversible or irretrievable effects on community services, employment, or housing availability. There would be a short-term increase in population during the 2-year construction and decommissioning periods that would increase the demand for community services such as public schools or law enforcement; however, a long-term population increase and demand for community services is not anticipated. The project would also have beneficial long-term effects on community services from increased tax revenues over the 34-year life of the project,” as stated in EIS Section 3.6.2.3 (Community Services, Employment, and Housing Availability, Irreversible and Irretrievable Commitments and Short-Term Uses Versus Long-Term Productivity). All action alternatives would result in residual effects to some resources, as described throughout the relevant sections in EIS Chapter 3 (Affected Environment and Impacts).
2930-1	Regina Smith	In Appendix F of the POD. F-6.3 line 16, states "All vehicles will have a fire extinguisher. At least one motorized vehicle in each active construction area still contain: shovel, Pulaski, hardhat etc." Measure 61 volume three page App 4-9 says the same thing. Shouldn't all passenger type vehicles carry this equipment in case of fire? And I would presume all the workers would carry hardhats, gloves and eye protection. There is no mention of personal protection equipment (PPE.) I wouldn't know about requirements for non-passenger equipment such as cranes, cement trucks, or helicopters etc.	The Health and Safety Plan (Appendix F in MVE [2023]) is the source of applicant-committed measure 61. The requirement for fire extinguishers applies to all service vehicles used for the project. This measure also states that at least one motorized vehicle in each construction area carry basic fire suppression equipment. This provides sufficient fire protection for each work site, and requiring all passenger vehicles and construction equipment to be equipped with similar fire protection equipment would be unnecessary and redundant. The PPE requirements listed in applicant-committed measure 61 are intended to ensure that personnel have sufficient PPE to implement basic fire suppression attempts. Additional PPE measures for construction, operations, and decommissioning activities will be included elsewhere in the Health and Safety Plan, as described in applicant-committed measure 65.
2939-3	George Solverson	A remarkable study demonstrated a reduction of bird strikes by 70% by simply integrating a "single" dark color blade on each tower should not have been dismissed out of hand without further written rational from the FAA. Transparency for all mitigation/monitoring actions and assurances needs to be made available to the public for the life of the project.	As described in EIS Section 2.9.5 (Alternative Components), the BLM evaluated painting one turbine blade black on each turbine because this has been documented to reduce bird fatalities by 70% in Europe (May et al. 2020). However, this would not comply with FAA standards (FAA 2020) and was not carried forward for detailed analysis. The marking standards outlined in FAA (2020) are required for aviation safety.
3074-1	Benjamin Byers	I support the Lava Ridge project, however, I don't think Alternative B is a suitable option for the communities impacted. Strong rules for MVE during construction and operation should be upheld to minimize the impacts to wildlife and surrounding communities. It is very critical that lighting is minimized to mitigate impacts on surrounding dark sky areas.	See EIS Chapter 3 (Affected Environment and Impacts) for a discussion of mitigation measures that would be implemented to minimize or avoid impacts to wildlife and night skies. A complete list of required mitigation measures is provided in EIS Appendix 4 (Mitigation).
3165-1	Lorand Layton	It seems to me that if after all the speeches are given and thoughts. expressed and before permission given to continue with the lava ridge project. there should be an agreement to provide the state of Idaho a percentage of	Details regarding mitigation can be found in EIS Appendix 4 (Mitigation). As described there, MVE would leave all existing public roads that are used or improved by MVE during the course of construction in a condition that is

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		the electrical power generated on and in the state of Idaho. In the form of rental and payment for Roads, Water, and Niceties used in the building and Maintenance of the facilities. And payment for any damages caused during the Installation of the project Caled Lava Ridge.	as good as or better than their condition when the construction period begins in accordance with MVE's agreements with the associated governing body (applicant-committed measure 38).
3169-2	Name Not Provided	will LS power be required to post a bond to cover any damages caused by the project.	See response to comment 24-1 (see in Table A-3cc, Mitigation – EIS Appendix 4).
3255-1	Regina Smith	Page 1- 5, last paragraph, "Issues that were identified..., where applicant-committed measures or other mitigation would reduce impacts below significance,..." There are literally hundreds of measures in this document. Some of which may be beneficial and others are meaningless. Under avian and bat species. Section 3.3.1.4 Compensatory mitigation Page 3-57 Measure VII "Contribute funds to survey abandon mines for bats and, if used, close with bat friendly gates. How does this lessen the impacts on bat collisions into windmills? It doesn't. In Nevada, the Abandoned Mine Survey has already completed most of this type of work. If this type of survey has been completed in Idaho then once again MVE is contributing nothing. Page 3-87, Measure XI "consider measures for other special-status species and species of concern, as determined through post construction monitoring. How is this a mitigation measure? In other words, let's go ahead and build this and see what happens. Really? Obviously the post construction surveys that they used for this analysis haven't worked. How does this constitute mitigation of impacts on bats? Or other species? Measure 158, on page APP 4-22, must've been written in conjunction with the previous measure. It starts with "a curtailment plan would be considered... only if such efforts are demonstrated to be cost-effective..." Assuming this plan were developed, when w;0uld this curtailment plan be developed? 1 year? 10 years into the operation? It reads as though MVE will be developing these curtailment strategies with very little consultation with governing agencies. The first bullet goes on to say that "peak periods and locations would be identified based on post construction fatality monitoring results..." Study should be started before construction. Flyways and routes of different species along with seasons are probably already charted. Mitigation plans need to be developed from predictive models based on known studies. It is irresponsible not to use and develop studies in advance. The bird sensors and monitors discussed elsewhere could be mounted on towers to record activity in various locations. Raptor studies have been in used for years. Powerlines run through the area currently. Why should MVE get a "get out of jail free card" for killing these threatened and endangered and special-status species? If they are released from liability, MVE won't need to bother with mitigation measures. Who is going to monitor to se_ that these measures are completed? Studies like these should be one in advance. Certain surveys have to be done in advance of construction mandated by law. For instance the class Ill cultural resources inventory. Meaningful mitigation measures can be developed simultaneously if not sooner.	Compensatory mitigation, by definition, is not intended to directly minimize or avoid impacts resulting from the project. Instead, the purpose of compensatory mitigation is to offset (or compensate for) impacts of the project that cannot be entirely avoided. Compensatory mitigation is the last tier in the mitigation hierarchy and is only considered after avoidance, minimization, and adaptive management measures have been implemented. "Types of [Compensatory] Mitigation Actions" that would be considered for bats are provided in "Mitigation Framework for Birds and Bats" (in EIS Appendix 4). These measures would offset impacts to bats from collisions with operational turbines at the project by improving habitat for bats elsewhere. Species-specific mitigation measures have been developed for avian species analyzed in detail in the EIS; however, as disclosed in EIS Section 3.3.2.2.2 (Avian Populations, Alternative B [Proposed Action]), "It is impossible to accurately predict the fatality rate for the Lava Ridge Wind Project because preconstruction use is not correlated with postconstruction fatality rates (WEST 2011)." Therefore, the "Mitigation Framework for Birds and Bats" is intended to provide flexibility in developing appropriate mitigation measures in the event that there are higher than anticipated impacts to other BLM-sensitive avian species (i.e., species that were dismissed from detailed analysis in the EIS; see Table App3-3 in EIS Appendix 3 [Issues Analyzed in Brief]). Although it is not anticipated that mitigation measures will need to be developed for these species, the purpose of the postconstruction avian fatality monitoring is to assess the actual avian fatality rates at the project and determine which adaptive management measures need to be implemented to reduce fatalities, if any. As described in applicant-committed measure 158, MVE would develop the curtailment strategy in coordination with the USFWS, BLM, IDFG, and OSC. Additional measure mm requires coordination with the TAC in determining appropriate species-specific mitigation measures. While applicant-committed measure 158 only considers implementing curtailment after other adaptive management measures have been proven to be unsuccessful, additional measure y was added in the final EIS to clarify that the TAC would be responsible for evaluating the results of postconstruction avian and bat fatality monitoring and recommending appropriate adaptive management measures (including curtailment strategies) to the BLM Authorized Officer, if warranted. The final EIS has been revised to include additional details on the TAC and clarify its role in recommending appropriate mitigation measures; see additional measure mm in EIS Appendix 4 (Mitigation). While a minimum of 1 year of postconstruction fatality monitoring would be necessary to determine whether avian or bat fatality rates exceed acceptable thresholds, the BLM Authorized Officer has the authority to require MVE to implement a curtailment strategy at any time during the 30-year operation phase. As described in EIS Section 3.3 (Avian and Bat Species), MVE has conducted a number of baseline resource inventories, including 2 years of avian use surveys, raptor nest surveys, and bat acoustic monitoring to characterize avian and bat use in the siting corridors. The results of these inventories were used to refine the locations of the siting corridors and develop avoidance buffers for high-use or sensitive areas; for example, no turbines would be placed within 1,000 feet of the agricultural canals in the siting corridors (see applicant-committed measure 138) or within 0.25 mile of known bat roosts (see additional measure n). As described in EIS Section 3.3, the project has also been sited outside of major migratory flyways for birds and bats and does not contain habitats or topography that would attract migrating birds and bats. However, as stated above, postconstruction fatality monitoring provides an opportunity to assess actual avian and bat fatality rates and determine which adaptive management measures need to be implemented to reduce fatalities, if any. This strategy is consistent with the recommendations in the USFWS's land-based wind energy guidelines (USFWS 2012). As described in Table App3-2 through Table App3-5, no species listed as threatened or endangered under the ESA occur in the siting corridors; additional consultation with the USFWS would be required if any species occurring in the siting corridors become listed in the future. MVE has not been released from liability and must comply with the MBTA and BGEPA. MBTA compliance is discussed in EIS Section 3.3.2.2 (Avian Populations, Impacts), and BGEPA compliance is discussed in EIS Section 3.3.3.2 (Eagles, Impacts). MVE's compliance manager is responsible for monitoring for compliance with required mitigation measures, including postconstruction avian and bat fatality monitoring. The final EIS has been revised to include additional details on the compliance manager as well as reporting requirements (see additional measure oo). As described in EIS Section 3.5.5 (Cultural Resources, Physical Impacts), pedestrian cultural resource surveys would be required prior to construction; additional details are provided in EIS Appendix 8 (Cultural Resources Programmatic Agreement).
3302-2	Susan Canham	What do you mean by "compensatory mitigation" if adaptive management practices for bats and birds are not successful?	As described under Compensatory Mitigation in EIS Appendix 4 (Mitigation), "Compensatory mitigation measures in Table App4-5 could be applied to alternatives if residual impacts are expected to remain after applicant-committed measures, required mitigation, and additional avoidance and minimization measures are implemented (BLM 2021)." Compensatory mitigation measures do not directly minimize or avoid impacts resulting from the project. Instead, the purpose of compensatory mitigation is to offset (or compensate for) impacts of the project that cannot be entirely avoided.
3350-1	Danielle Hughes	Lava ridge. This is an early draft and I feel strongly it should not ve public. However, I thought you should have the ideas in a minor way. Theoretically edit more and such. Not sure worth more time at moment. If it is I will edit and send formally in OK form for public viewing. Reconceptualize Celebrate and enjoy it including multicultural center and park that celebrates Idaho and the world. Enjoy the wind turbines in the area they are in. Create a public area where people can enjoy being there. A big rambling outdoor area integrated with the wind	The BLM is responding to MVE's application for a wind generation facility on public land that connects to the Midpoint Substation or SWIP-North. New parks are outside the scope of the EIS; however, a number of potential compensatory mitigation measures are being considered and are described in EIS Appendix 4 (Mitigation).

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		turbines that does not interfere with grazing or environment. The center can include the arts, the environment, history, culture, exercise and a diverse energy system that is in nature including active in area industry and culture already. It is possible to include in the proposed planned passenger train from Salt Lake City, Utah to Boise, Idaho with a stop at the center along the existing tracks there to enjoy the diversity of Idaho largely outdoors The energy system could have an option to have some power produced to stay in idaho if there is a need. For example, Boise in the last some years had a power outage when the school district returned from spring break and turned back on all the copiers. The energy system could largely be the wind turbines. A water wheel of a small size approximately 6 feet in diameter showing the concept in a functional way. Hydropower is more than that and that can be included in text on signage. A small solar part that utilizes current and new technology completes the system. Less than a linear mile of sections total of that. Maybe walking and snow shoe and cross country scenic paths including birdwatching nature and exercise and meditation stops as well as enjoy the combined contemporary sounds of idaho with nature and industry in harmony (Carl Sandburg poem type quietly current on inspiration board) Architecture evocative of existing including silhouette. Likely open structures for much of it. Long low with peaked metal roof close to horizon. But not only. Blends in and almost unseen. A cultural area that includes a smallish outdoor stage for theater, dance, film and more. Stage including theater outdoors that features plays from each continent annually as well as idaho writers and Shakspeare and the Greeks. (Copyright free plays partly) Sculptures around in various configurations including groupings. A bunch together here in a meaningful diverse supportive inclusive welcoming way. Peoples, time periods, and parts of Idaho etc. An outdoor mural that highlights Idaho and its people. Features people of idaho. Hundreds. Close enough to census stats. Including people from each of the tribes and major immigrant groups. Has learning stations that feature the history, environment, people and culture of idaho including downloadable pds of writers including poems about idaho and prose and essays. These can be traditional park type signage. A language center where people can learn the many languages of Idaho including native basque and many more. Free pdf and audio files including a download station there so can enjoy it outdoors in the environment. Explore the music of Idaho including created here including performance. This can possibly have a not extremely expensive or difficult start option. Approximately layout hoped for. Start core and lay in a start. See if extra is around including previous in storage that can be used for the thirty year life span of the project. For example nature stem trail learning stop sign explaining something. The walking trail. One of the buildings including picnic seating in one end for a third of the building. Idaho legislature sometimes authorizes sculpture and this can be a nice place for such. A brick wall about ten feet tall is possible across part of an area. Note: proposed world peace monument in South west idaho could have a pleasant with this.	
3500-2	Alta Toler	Also, what are you doing to minimize the killing of birds and bats? Have you looked into different colors so that they are more visible to flying animals? This current style machine, with wide, huge blades, contributes to the death of many animals and unless you have investigated how to correct this then this is NOT a good project. It is time to upgrade and find better solutions to these old-style wind generators. I want us to be more energy independent, but I want us to be smarter about it. https://www.sciencedaily.com/releases/2021/04/210427085752.htm BEST WISHES, Alta Toler Alta Toler ALTATOLER@GMAIL.COM	Measures that would be implemented to minimize, avoid, or offset impacts to avian and bat species are discussed in EIS Section 3.3 (Avian and Bat Species). As described in EIS Section 2.9.5 (Alternative Components), “The BLM evaluated painting one turbine blade black on each turbine because this has been documented to reduce bird fatalities by 70% in Europe (May et al. 2020). However, this would not comply with FAA standards (FAA 2020) and was not carried forward for detailed analysis.” The vertical turbines described in the news article referenced in the comment are still in the very early stages of development, and there are no commercially available models that could be used for this project.
36-1	Jim Kuehn	Any power generated by any turbines built in the state of Idaho and shipped out of state, should have a substantial tax placed on the exported energy and placed in a fund to mitigate wildlife damage, environmental damage and benefit upgrading, maintaining and expansion of existing and potential new sustainable energy projects that keep the generated power in the state of Idaho. Before this project gets approved and moves forward, the developers of this project need to provide a bond that is 2.5X the estimated cost of 100% removal and restoration of the land this or any other ESG project that the BLM is contemplating allowing on their ground in the state of Idaho.	The BLM is responding to MVE’s application for a wind generation facility on public land that connects to the Midpoint Substation or SWIP-North. New taxes are outside the scope of the EIS; however, a number of potential compensatory mitigation measures are being considered for impacts to wildlife and other resources, which include providing funds to programs that conserve or enhance habitat for wildlife (see, for example the “Types of Mitigation Actions” in the Mitigation Frameworks in EIS Appendix 4). As described in applicant-committed measure 164, “MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria.” The final EIS has been revised to include additional details on the reclamation bond; see applicant-committed measure 164.
4558-2	Joan Hurlock	According to Tables 2.4-1 Project Components by Action Alternative, 2.4-2 Access Road Categories and Mileage within the Citing Corridors, and 2.4-3 Traffic Details, the construction phase of the Lava Ridge Wind Project will include the addition of up to 486 miles of new roads and up to 2.4 million vehicle trips for the duration of the construction phase. The generation of Fugitive Dust Emissions will be substantial and has the potential to impact the air quality. To mitigate this, Magic Valley Energy proposes posting 25 mph speed limit signs (p 3-19), spraying water on the access roads and using a chemical dust palliative such as Magnesium Chloride (MgCl), p 3-20. Posting speed limit signs is not effective and are largely ignored. Using water to control dust will utilize a resource that is scarce in the Magic Valley, as we are experiencing a multi-year drought. Because these mitigation methods will have little impact on controlling fugitive dust emissions, it is likely the chemical dust palliative, MgCl, will be necessary to control fugitive dust emissions. It is MgCl that I will address. Magnesium Chloride is used to control dust and is also used as a chemical deicer on winter roads. Being a water soluble compound, when applied to road surfaces, the MgCl will eventually dissolve and research has shown this negatively impacts soil, water, and vegetation. The use of Magnesium chloride can lead to soil degradation by causing soil sealing, destabilization of aggregate and land salinization. The application of MgCl on access roads can suppress plant growth by impacting plant photosynthesis and plant respiration. And most importantly, McCl can pollute ground and drinking water. The Lava Ridge project area is situated atop the Snake River Aquifer. What will the temporary and/or cumulative permanent effects be to the aquifer, area wells, and to the Snake River when the MgCl dissolves and eventually leaches into these sources of water? How does Magic Valley Energy plan to mitigate the contamination to these sources of water? Included with this letter is a research paper	See response to comment 3811-4 (in Table A-3v, Soils). The magnesium chloride application rates would be well below the level that would be expected to result in measurable impacts to soil and water resources or cause damage to vehicles. As described in EIS Section 3.2.1.2.2 (Air Quality, Alternative B with Additional Measures), “MVE and its contractors would control dust to the extent that off-site transport of visible dust plumes is eliminated” (see additional measure e). A number of other preventative measures are described here that would reduce the need for water applications to control dust. The final EIS has been revised to include additional details on construction monitoring and reporting requirements. A complete list of required mitigation measures is provided in EIS Appendix 4 (Mitigation).

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		that evaluates the effects of MgCl on the environment, as well as the sales literature produced by Snow & Ice Salt & Chemicals Unlimited, LLC. Even this literature has a statement that MgCl can be harmful to the environment. Also included is an article that discusses MgCl and the effects it has on vehicles. According to the article, " Magnesium Chloride is especially corrosive to metals, and therefore vehicles". See the attached "What is Mag Chloride & What Does It Do To Your Car?". The solution to preventing corrosion is to remove the chemical with soap and water. Was the additional water that will be used to clean all of the machinery and employee vehicles, taken in to consideration in the water usage totals? Will Magic Valley Energy pay for the damage done to vehicles and equipment that is caused by the corrosive nature of MgCl? According to pages 3-351,352, & 353 of the EIS report, the Soil Surveys revealed that 95% of the soil in the project area is classified as fragile and 4.5% is very fragile. The disturbance to the biological soil crusts may have impacts that last up to 125 years and others will have permanent impacts due to the concrete pillars that will remain indefinitely under the ground upon decommissioning of the project.	
5213-4	Sue Page	3.11.1.4 COMPENSATORY MITIGATION No Compensatory Mitigation is proposed!!!	Compensatory mitigation measures are not proposed for pollinators; this is because it is not anticipated that there would be residual impacts to pollinators after the implementation of applicant-committed and additional project-specific mitigation measures, which would largely minimize or avoid impacts to pollinators. Species-specific compensatory mitigation measures have been developed for the St. Anthony sand dune tiger beetle, which are described in EIS Section 3.11.2.5 (St. Anthony Sand Dune Tiger Beetle, Compensatory Mitigation). Compensatory mitigation measures for other resources are described throughout the relevant sections in EIS Chapter 3 (Affected Environment and Impacts); a complete list is provided in Table App4-5 in EIS Appendix 4 (Mitigation). The final EIS has been revised to include additional details on compensatory mitigation, where appropriate (see the Mitigation Frameworks in EIS Appendix 4).
6836-1	Karleen Davis	hope that we can find some mitigations that will retain the emotional and historical value of the Minidoka National Historical Site. I hope visitors to the Minidoka Historical Site will have an emotional experience and come to understand the human toll of this tragedy. Although, I haven't found any ground level photos from the camp facing south. But I do see in the aerial photos, the earth berms around the camp. I suggest that re-installation of these berms will help visitors to fell hemmed in and isolated the way Japanese Americans felt there. And will help to mitigate the visual impact of the turbines 2 miles away.	See analysis presented in Sections 3.5.5.2, 3.6.1.2, and 3.19. See response to comment 9080-46 (see in Table A-3cc. Mitigation – EIS Appendix 4).
8-2	Patrick Williams	Though the EIS will cover the required items, the intangibles are still not addressed. Kills of local and migratory birds needs to be better considered. For example, the wind farm on Maui requires finding and reporting all birds kills; of which the company is required to pay fines for each kill. If this project must proceed--investment in painting one blade of each windmill a dark or black color. This is proven to provide contrast so birds can actually see the blades.	ESA ITPs have been required for wind energy developments in Hawaii due to the potential for ESA listed and threatened and endangered species to be killed by collisions with operational turbines. While ESA ITPs specify compensatory mitigation requirements for incidental take authorized by the permit, which may include payments to mitigation funds, the BLM is not aware of any fines being issued for ITP violations at Hawaiian wind energy facilities. An ITP is not required for the Lava Ridge project because threatened and endangered species do not occur in the siting corridors. Should any species occurring in the siting corridors become listed under the ESA in the future, additional consultation with the USFWS would be required. As described in EIS Section 3.3 (Avian and Bat Species), a number of mitigation measures would be implemented to minimize or avoid impacts to avian and bat species, and a minimum of 2 years of standardized postconstruction avian and bat fatality monitoring would be implemented to assess actual avian and bat fatality rates and determine which adaptive management measures need to be implemented to reduce fatalities, if any. Bald and golden eagles are not listed under the ESA but are protected under the BGEPA; the USFWS issues ITPs for incidental take of eagles in accordance with the Eagle Permit Rule. As described in EIS Section 3.3.3.4 (Eagles, Compensatory Mitigation), "The USFWS will be responsible for making a decision on MVE's eagle incidental take permit application and determining any compensatory mitigation necessary to address incidental take arising from collisions with turbines." Painting one turbine blade black was not analyzed in detail in the EIS because it would not be compliant with FAA regulations (see EIS Section 2.9.5 [Alternative Components]).
8629-5	Cathy Schiers	What are the mitigation plans if there is an oil spill and the oil seeps into the porous lava beds? The aquifer is right below those lava beds, and that is a concern for the health and safety of Idaho residents, plants, and wildlife.	A new issue was added to the EIS to address groundwater quality: Section 3.17.3 (Groundwater Quality). Also, see AIB-47 in EIS Appendix 3 (Issues Analyzed in Brief): How would inadvertent spills or leaks from the storage or application of herbicides or the use or production of hazardous materials and wastes during construction and operation affect surface water or groundwater quality?
9080-15	The Coalition to Protect America's National Parks	3. The DEIS contains confusing and inconsistent information regarding potential compensatory mitigation for Dispersed Environmental Justice Populations (the Japanese American Community and Native American Tribes) – DEIS Appendix B, Table App4-5, on Potential Compensatory Mitigation Measures, Items XIV-XVI indicates that MVE will provide the following compensatory mitigation to Environmental Justice Populations: • XIV. MVE would fund the design and preparation of an ethnographic study and report related to Minidoka National Historic Site. This would be accomplished in close coordinate with Japanese American Stakeholders and the National Park Service. • XV. MVE would fund the design and preparation of an ethnographic study and report related to Shoshone-Bannock Tribes and Shoshone-Paiute Tribes. This would be accomplished in close coordinate with these Native American Tribes. • XVI. MVE would establish a fund to be used based on recommendations from a committee that would be established and comprise Minidoka NHS stakeholders with an emphasis on including representatives of Japanese American organizations. Recommendations from the committee would focus on enhancing the fundamental values of Minidoka NHS so that it will continue to provide opportunities for commemoration and healing through pilgrimages and provide opportunities for bettering humanity as a site of	EIS Appendix 4 presents the compensatory mitigation measures in Table App4-5 as measures that "could be applied to alternatives if residual impacts are expected to remain after applicant-committed measures, required mitigation, and additional avoidance and minimization measures are implemented (BLM 2021). Potential compensatory mitigation in Table App4-5 could be included in compensatory mitigation plans if the BLM determines they are warranted." This is consistent with how the measures are presented throughout the Chapter 3 analyses; for example, Section 3.6.1.4.1 (Compensatory Mitigation for Dispersed Environmental Justice Populations) was revised to state that "the following compensatory mitigation measures could be applied to any action alternative if the BLM determines it is warranted." Under NEPA, the purpose of an EIS is to provide the BLM decision-maker, with enough information to make an informed decision on whether or not to grant the ROW, and whether or not to attach terms and conditions, including compensatory mitigation measures. This is why mitigation measures are presented as "potential" since the BLM has not yet made their decision on the requested ROW prior to issuing the ROD. Should compensatory mitigation be warranted, compensatory mitigation would be developed through consultation with consulting parties and government-to-government

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		conscience. Recommendations from the committee may include but are not limited to the following: o Establishing conservation easements to preserve the visual character of the surrounding landscape o Removal of existing visual intrusions within close proximity to Minidoka NHS that take away from meeting its fundamental values o Increasing access to pilgrimages and educational materials that provide a better understanding of the history associated with Minidoka NHS The above section of Appendix B creates the impression that MVE would provide the listed compensatory mitigation regardless of which action alternative is selected. However, for the majority of impact topics discussed in Chapter 3 of the DEIS, BLM states, in effect, "that compensatory mitigation would not be warranted." The only two impact areas that could possibly result in compensatory mitigation for the Japanese American Community and Native American Tribes are "Cultural Resources" and "Environmental Justice and Socioeconomics." However, both Sections 3.5.6.4 and 3.6.2.4.2 in Chapter 3 state specifically that (for Cultural Resources and Environmental Justice and Socioeconomics respectively) the "compensatory mitigation measures could be applied to [only] Alternative B [but only] if the BLM determines it is warranted (see EIS Appendix 4)." (Emphasis added) These statements that "compensatory mitigation could apply [only] to Alternative B" are both confusing and concerning because BLM has elsewhere created an expectation among the Japanese American Community and Native American Tribes that the proposed compensatory mitigation measures would apply regardless of which action alternative is ultimately selected. BLM should correct the wording in these two sections of the DEIS (or in Appendix B, if needed) to accurately reflect BLM's intent about compensatory mitigation.	consultation as part of the NHPA Section 106 process under the HPMP of the PA (draft provided as EIS Appendix 8).
9080-38	The Coalition to Protect America's National Parks	D. Section 2.3.4 Avoidance and Minimization (p. 2-4) – This section provides a brief overview of the concept of mitigation, which is defined in the Council on Environmental Quality's (CEQ) NEPA regulations (40 CFR 1508.1(s)) as "avoiding, minimizing, rectifying, reducing over time, or compensating for impacts of a proposed action." In plain terms, there is a significant difference between "avoidance" (meaning "no impacts occur") and the other levels of "mitigation" listed in the CEQ definition, all of which would allow varying degrees of adverse effects. As we will discuss later in these comments, we are very concerned that throughout the DEIS BLM focuses primarily on avoiding only physical adverse effects to protected cultural and historic sites such as Minidoka NHS, the WRC, and Wilson Butte Cave. In contrast, all action alternatives would readily allow non-physical adverse effects such as major visual intrusions and noise that would adversely affect the protected sites. Later in this letter we will comment on the proposed mitigation measures, which are described in Appendix 4 of the DEIS.	The Mitigation Framework provided in EIS Appendix 4 (Mitigation) describes the BLM's mitigation hierarchy and differences between the types of mitigation (avoidance, minimization, rehabilitation, and compensatory mitigation).
9080-45	The Coalition to Protect America's National Parks	E. Section 3.5.6.4 Compensatory Mitigation for Cultural Resources (p. 3-188) – As background, see General Comment 3 above. This section of the DEIS states that "[e]ven with the implementation of avoidance, minimization, and mitigation measures, residual impacts to the Japanese American community and Native American Tribes could still occur." It goes on to include a confusing if not misleading statement regarding the applicability of compensatory mitigation under the proposed Programmatic Agreement (PA) described in Appendix 4. (The draft PA creates the impression that the compensatory mitigations measures would apply to any/all of the action alternatives.) However, p. 3-188 of the DEIS states: "The following compensatory mitigation measures could be applied to Alternative B if the BLM determines it is warranted (see EIS Appendix 4: Table App 4-5)." (Emphasis added) The statement that "compensatory mitigation could apply only to Alternative B" is both confusing and concerning because BLM has created an expectation among the Japanese American Community and Native American Tribes that the proposed compensatory mitigation would apply regardless of which action alternative is ultimately selected. BLM should correct the wording in this section of the DEIS (or in Appendix B, if needed) to accurately reflect BLM's intent about compensatory mitigation.	See response to comment 9080-15 (see in Table A-3cc, Mitigation – EIS Appendix 4).
9080-46	The Coalition to Protect America's National Parks	F. Section 3.6.2.4.2 Compensatory Mitigation for Dispersed Environmental Justice Populations (pp. 216-217) – This concern is similar to the above comment. With regard to the Japanese American Community, this section states that compensatory mitigation measures "could be applied to Alternative B if the BLM determines it is warranted." With regard to Native American Tribes, this section states that "[t]he following compensatory mitigation measure could be applied to Alternative B if the BLM determines it is warranted." (Emphasis added) These statements that compensatory mitigation could apply only to Alternative B are both confusing and concerning because BLM has created an expectation among the Japanese American Community and Native American Tribes that the proposed compensatory mitigation would apply regardless of which action alternative is ultimately selected. BLM should correct the wording in this section of the DEIS (or in Appendix B, if needed) to accurately reflect BLM's intent about compensatory mitigation.	Revisions were made in the EIS to these Compensatory Mitigation sections, as well as the measures in Table App4-5. Compensatory mitigation frameworks were developed and are provided in EIS Appendix 4: • Key Resources and Values Associated with Minidoka National Historic Site • Greater Sage-grouse • Big Game • Birds and Bats
9080-56	The Coalition to Protect America's National Parks	5. APPENDIX 4. Mitigation – Multiple tables in this appendix list numerous "applicant committed measures" that are purported to lessen the severity of the many adverse effects that would be caused by the Project. However, very few of the proposed mitigation measures actually result in the "avoidance" of adverse effects, even though "avoidance" is the most effective form of mitigation. For example, Table App4-2c lists measures #18-28 intended to reduce impacts related to "Visual Resources, Lighting, and EMF." The measures listed are generally common sense things like turning off unneeded lights at night; and painting facilities including the giant wind turbines with dull colors and/or non-reflective finishes, rather than bright colors or highly reflective finishes. While these measures undoubtedly would reduce unnecessary exaggeration of the visibility of the wind turbines (e.g., that could otherwise be caused by unnecessary lighting or extremely colorful or highly reflective paint jobs), they would do little to actually prevent or avoid significant visual impacts due in large part to the size, number, and proximity of the turbines to affected sites. Our observation has been that there is no such thing as a paint job that will make a 500-to-700 foot tall wind turbine blend into the background scenery, especially at the inadequate	See response to comment 9080-15 (see in Table A-3cc, Mitigation – EIS Appendix 4). Regarding additional consideration of avoidance measures, project redesign and the range of alternatives considered in the EIS incorporate additional avoidance and minimization of adverse effects to Minidoka NHS and a variety of other resources, such as other historic properties, although all historic resources are not fully avoidable by project adverse effects under any alternative. See response to comment 12177-1 (see in Table A-3g, Cultural Resources and Native American Concerns) regarding setbacks as related to cultural resources.

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		setback distances proposed in each of the action alternatives. The turbines will still be readily visible, especially in an open landscape such as that surrounding Minidoka NHS. True avoidance of visual impacts involving wind farms is primarily accomplished through siting decision(s), which is where this Project proposal falls short. BLM is considering a number of action alternatives that would allow multiple rows of very large wind turbines to be constructed in close proximity to significant historical and cultural sites.	
9080-57	The Coalition to Protect America's National Parks	In addition, Table App4-2j lists Applicant-Committed Mitigation Measures # 94-96 related to Cultural Resources. These include a "historic properties treatment plan (HPTP) and a paleontological resources treatment plan (PRTP) [that] would be drafted prior to construction." It is not clear from the description which entities would be involved in the preparation and/or review of the respective plans. In addition to BLM, the National Park Service, Native American Tribes, the Japanese American Community, and the Idaho State Historic Preservation Officer (SHPO), we ask that the Advisory Council of Historic Preservation71 (ACHP) be actively involved in the preparation and review of the respective plans. In total, the project is highly controversial and concerning because it presents so many potential threats to the preservation of historic properties and associated cultural resources within the Project area. It is essential that the programmatic agreement, treatment plans, mitigation measures, any related actions and processes developed to avoid or minimize adverse effects on historic resources are widely perceived as credible. We believe the best way to ensure credibility in this case is to have the active participation of the ACHP.	See response to comment 6900-1 (see in Table A-3ff, Consultation and Coordination). The ACHP is actively participating in the NHPA Section 106 consultation process for the project, including reviews of the PA as it continues to be developed, and the consideration of supporting documents specified by the PA, such as the HPMP and HPTPs.
9080-58	The Coalition to Protect America's National Parks	To repeat an earlier comment, the introduction to the section on Compensatory Mitigation beginning on p. App4-33 creates the impression that the potential compensatory mitigation measures listed in Table App4-5 (including measures XIV-XVI related to "environmental justice, cultural resources") could/would apply to any/all of the action alternatives. We call your attention to our previous comments about DEIS sections 3.5.6.4 (Cultural Resources) and 3.6.3.4.2 (Environmental Justice Communities) which, in contrast to Appendix 4, state that the proposed compensatory mitigation "could be applied [only] to Alternative B." We (again) request that BLM fix this discrepancy so that the intended application of compensatory mitigation for the Japanese American Community and Native American Tribes is clear and consistent throughout the EIS.	See response to comment 9080-15 (see in Table A-3cc, Mitigation – EIS Appendix 4).

Plan of Development – EIS Appendix 1

Table A-3dd. Plan of Development – EIS Appendix 1

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1030-1	Linda Denning	Also, please consider that there is no good way to dispose of the massive blades should they ever need to be dismantled.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
1040-1	Name Not Provided	I also understand they leak oil and they need to have regular oil changes, what does this do to our land,	The Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]) describes BMPs and requirements that address how potential oil leaks or spills would be addressed.
1040-2	Name Not Provided	What do you do with them when the become outdated?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste), and see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
1042-25	WildLands Defense	Where will gravel come from and what is the pollution footprint– what other land will be destroyed for gravel alone? Where will all materials used in turbines and all other components originate, and what toxic pollution will be associated with mining and processing and what will be contaminated?].	Section 2.8 of MVE (2023) discusses the source and use of gravel.
10427-3	Jess Bartlett	How about the excessive number of wells that will be drilled for the incoming work force, and the strain that will put on our already limited water supply?	The use of groundwater wells is discussed in Section 1.3.11 of MVE (2023).
10471-4	Brett Lemmons	Have you ever heard a pinhole in a blade of a wind generator? It echoes for miles, how long would it take their maintenance crew to shut down this unit with a pinhole and repair it? The maintenance crews for the Hagerman Valley wind farm take 3 days to show up.	Maintenance and operation of the proposed facility are discussed in Section 4.0 of MVE (2023).
10508-2	Susan Johnson	And the proposed project is only to be in place for 34 years? All of this disruption and permanently ruining our public lands for thirty-four years? Who is going to do reclamation?	The authorization holder will be required to complete the reclamation. See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
1051-1	Bill Baker	1. My concern is that the wind turbines be located as close to the final users as possible. Routing long distance across uninhabited areas leaves the transmission line towers exposed to possible damage by groups like those that have been attacking electrical substations.	The market demand for renewable electricity is described in Section 1.2 of MVE (2023).
1051-2	Bill Baker	2. If these generators prove to be unprofitable and are abandon. Who cleans them up and at what cost to the tax payers?	See response to comment 12925-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
1071-2	Don Campbell	2) the Environmental Impact Statement should include how components of the wind farm will be disposed of after their useful life; who will pay for the dismantling and disposal.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).

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11189-3	Anthony Lombardi	Wind turbines are also made with "Carbon Composite blades"... that go out of balance and must be replaced, which Mojave and Tehachapi, Calif. Have found out the hard way. Massive trenches were dug to " bury" the blades, which will leach chemicals from the adhesives and the materials themselves for years and years.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
11204-6	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Permittees are particularly disturbed by the lack of consideration and assessment as to timing in the DEIS. Timing is a material, critical element because it provides the necessary sideboard for how, if at all, the Permittees can sustain their respective livestock operations relative to the actual implementation of the construction phase, rehabilitation phase, operational phase, and decommissioning phase. The lack of disclosure as to the actual timing of each phase makes it effectively impossible for BLM to adequately assess livestock impacts, and also makes it effectively impossible for the Permittees to comment to the actions / mitigations currently considered and assessed in the DEIS.	See the Grazing Coordination Plan (Appendix S in MVE [2023]). MVE will coordinate timing specifics with the BLM and grazing permittees during all project phases.
11204-7	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	I. Lack of identified wind resource potential in the Project area. See 2021 Comments, pgs. 4-6. Summary: The DEIS needs to be revised to verify that a commercially viable wind resource potential exists to support the proposed Project based upon empirical evidence rather than vague claims. The 2021 Comments noted that there is an "apparent lack of wind potential within the Star Lake Allotment according to the U.S. Department of the Interior itself" and concluded that because "little or no wind potential exists, it seems the project is doomed at the outset." 2021 Comments, pg. 4. According to a Wind study report by the USDI, "the wind potential to support a Wind Project upon the public lands within the Star Lake Allotment is non-existent in some parts and low in other parts," 2021 Comments, pg. 5, while areas to the southeast and to the southwest of the Allotment have "Medium" and "High" wind resource potential, 2021 Comments, pg. 6. The DEIS did not adequately address this issue. The Project requires a viable wind resource potential to be successful. However, the wind resource potential to support a wind power generation project upon the public lands within the Star Lake Allotment was rated non-existent in some parts and low in other parts according to a 2005 Wind study report by USDI.3 In fact, the DEIS "tiers to the BLM's Final Programmatic Environmental Impact Statement for Wind Energy Development on BLM-Administered Lands in the Western United States (BLM 2005a)," DEIS, pg. 1-7, indicating explicit knowledge by USDI-BLM and by MVE of such wind study report, and such lack of wind resource within the Star Lake Allotment. The 2005 Wind study report found that areas outside the boundary of the Star Lake Allotment, i.e., to the southeast and to the southwest, have "Medium" and "High" wind resource potential. See 2021 Comments, pgs. 4-6. The DEIS and its supporting documents make some superficial claims that a viable wind resource potential exists to support the proposed Project. The Project's Plan of Development states: The proposed Project location was selected based on the quality of the wind resource in the area, the power markets accessible by existing and planned transmission lines in the area, the availability of suitable land, and the absence of land use constraints such as wildlife management areas, areas of critical environmental concern ("ACECs"), designated wilderness areas, wilderness study areas ("WSAs"), roadless areas, and other restrictive land use designations. DEIS, pg. 591 [Appendix 1, Plan of Development, pg. 3] (emphasis added). The plan of development for the project also states: MVE currently has eight (8) temporary preconstruction meteorological towers ("met towers") installed across the Project site to record wind conditions. MVE also deployed a LiDAR to record wind speeds at higher elevations and confirm other atmospheric conditions suggested by the met tower data. DEIS, pg. 645 [Appendix 1, Plan of Development, pg. 57] (emphasis added). However, despite these claims, the DEIS fails to disclose, or even to summarize, such purported "wind resource" or data to document that a commercially viable wind resource potential exists to support the proposed Project. The DEIS even admits that: Site-specific data for wind variability within the project area were not available to the BLM, but it is generally understood that the wind resource varies with topographic features and associated changes in elevation that are present across the project area. DEIS, pg. 2-17 (bold and underline emphasis added). This is analogous to BLM considering and assessing a FLPMA Road Right-of-Way across the public lands that is surrounded by private land owned by others, i.e., the non-applicant. If the applicant cannot get access across the adjacent private land, then BLM considering and assessing a FLPMA Road Right-of-Way across the isolated public lands is meaningless and a waste of public resources and time. In this case, if there is not a viable wind resource to support the proposed wind Project, considering and assessing a Wind Right-of-Way is meaningless and an entire waste of public resources and time. The admitted lack of "[s]ite-specific data for wind variability within the project area," DEIS, pg. 2-17, is a fatal flaw in the NEPA process, given that the: Alternatives were developed using subsets of the Proposed Action siting corridors because the Proposed Action siting corridors were developed considering wind resource data and requirements needed to develop a technically feasible project. DEIS, pg. 2-1. Given the admitted lack of "wind resource data" and given the best evidence, i.e., 2005 Wind study, has rated the Project area as having non-existent or low wind resource potential for wind power projects, it goes without saying that the proposal is damned before it even gets started. Further, vague statements as to any claimed "wind resource" currently in the POD are inadequate, particularly for NEPA purposes.	See Section 1.2 of MVE (2023). The BLM is evaluating MVE's project application. MVE has gathered meteorological information from their eight towers across the project. This information is more current than information presented in the 2005 wind study (BLM 2005a). The BLM considered wind resource information that was presented by staff from the National Renewable Energy Laboratory (NREL) and downloaded from Global Wind Atlas (2023). The BLM reviewed the modeled average wind speed at 100 m for the analysis area and the Proposed Action turbine corridors overlap with the higher values from this information. Global Wind Atlas. 2023. Welcome to the Global Wind Atlas. Available at: https://globalwindatlas.info/en. Accessed December 28, 2023.
11204-10	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	V. Lack of specific information as to planning and timing during the construction phase and operation & maintenance phase of the Project. See 2021 Comments, pg. 4. Summary: The DEIS needs to be revised to disclose and analyze a "worst-case scenario" that includes site-specific impacts that would result from the proposed Project assuming the maximum of 400 3-MW wind turbines or 349 6-MW wind turbines were installed at specified "final" locations that just / barely comply with the minimum setbacks evaluated. In other words, such "worst-case scenario" analysis would project a "final" location for every wind turbine that would be installed under a 3-MW or 6-MW operational scenario to just / barely achieve compliance with the minimum setbacks established by the DEIS sideboards, and then disclose the impacts that would result from such worst-case wind turbine siting locations. Page 4 of the 2021 Comments acknowledged receipt of the April 5, 2021 Notice	The EIS describes the assumption used for construction timing and duration.

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		("Notice"), relating to the proposed Project (Right-of-Way Serial No. IDI-39174) impacting, among other lands, the public lands in the Star Lake Allotment. The Notice invited comments on "site-specific issues on how the proposed project may impact your grazing operations" including "on-the-ground grazing mitigation, such as grazing practices, seasonal movements, range improvements (e.g., moving fences, water distribution), rerouting access, etc.". The 2021 Comments noted that it is a difficult challenge to provide site-specific comments regarding such grazing matters when the environmental documentation regarding the Project provides little or no site-specific information relative to the Star Lake Allotment particularly as to timing of the actual implementation of the construction phase, rehabilitation phase, operational phase, and decommissioning phase. 2021 Comments, pg.4.	
11204-12	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	VI. The Construction phase is likely to exceed the projected 2-year timeframe, see 2021 Comments, pgs. 4 & 16, and related Permittees' request to divide the Construction phase into three subphases within the Star Lake Allotment. See 2022 Comments, pgs. 4-5. Summary: Assuming and subject to the disclosure of the location and timing specifics, as addressed in the above Sections, the DEIS needs to be revised to reduce resource impacts during construction by stipulating that the Project avoids construction activities when road-bases and soils are saturated and prone to muddy conditions (resulting in excessive rutting, displacement, and compaction) and avoids periods when soils are likely frozen and would require heavier equipment to break loose and work. The DEIS should limit construction (and decommissioning) activities to the period between June 1 and October 31 each year. Construction (and decommissioning) activities within the Star Lake Allotment should be spread out over at least a 3- year construction period with one of three (3) subphases being constructed between June 1 and October 31 each year (if the Project is authorized). Any shorter construction period within the Star Lake Allotment would be incompatible with, or excessively disruptive to, ongoing grazing operations. If the 4-year construction timeframe within the Star Lake Allotment consisting of 3 consecutive 16-month periods requested under the 2022 Comments is objectionable to MVE, the DEIS should be revised to a 3-year construction period within the Star Lake Allotment with one of the three subphases being constructed between June 1 and October 31 each year (if the Project is authorized). We view any shorter construction period within the Star Lake Allotment as being incompatible with, or excessively disruptive to, our ongoing grazing operations. The 2021 Comments and 2022 Comments opined that it was unrealistic to anticipate that the project construction phase could be completed within a 2-year timeframe (2021 Comments, pgs. 4 & 16 [and 2022 Comments, pg. 3, footnote 4]) during a 16-month period from June 1 in year 1 through September 30 of Year 2 (2022 Comments, pg. 4). Instead, the 2022 Comments requested that the construction phase of the Project be divided into three (3) subphases within the Star Lake Allotment, as follows: • Subphase 1 = public lands within the southeastern portion of the Star Lake Allotment during "one" 16-month construction period (2022 Comments, pg. 4); • Subphase 2 = public lands within the northeastern portion of the Star Lake Allotment during "another" 16-month construction period (2022 Comments, pgs. 4-5); and, • Subphase 3 = public lands within the western portion of the Star Lake Allotment during "one" (a third) 16-month construction period (2022 Comments, pg. 5). Thus, the Permittees requested in their 2022 Comments that the construction phase of the Project be divided into three (3) subphases within the Star Lake Allotment and anticipated that such construction subphases would spread the construction over three separate 16-month periods for an overall construction phase lasting 48 months (a 4-year period). The DEIS did not adequately address these issues. While the DEIS states that the construction schedule within the Star Lake Allotment would be divided "into three subphases" so that construction occurs in approximately 1/3 of the Star Lake Allotment at any given time (DEIS, pgs. 2-3, 3-233, and 3-279), the DEIS still lacks specific information regarding planning and timing relative to these three construction subphases. Similarly, the DEIS omits any consideration and assessment of the same relative to the rehabilitation phase. Furthermore, the DEIS anticipates that the three construction subphases within the Star Lake Allotment will still be completed "during the 2-year construction phase" originally projected for the Project (DEIS, pg. 3- 233). Again, the Permittees urge that the construction phase of the Project within the Star Lake Allotment, if authorized, be spread over a longer timeframe to reduce the potential for conflicts between construction activities and livestock operations and to reduce the amount of temporary infrastructure necessary during construction. Timing is a material element because it provides the necessary sideboard for MVE to plan and implement construction and rehabilitation, and more importantly, it provides the absolutely necessary sideboard for the Permittees as to notice and planning of their respective livestock operations. Permittees cannot be reasonably asked to accommodate any construction or rehabilitation plan without significant pre-notice, i.e., at least 1-year. Also, while the Permittees request that the construction schedule within the Star Lake Allotment be divided "into three subphases" to spread construction over a timeframe longer than the anticipated 2-year period to reduce potential conflicts between construction activities and livestock operations, an excessively lengthy construction period would also be problematic. Some Permittees heard suggestions from BLM personnel that the actual construction period for the proposed Project may end up spanning a period as long as 20 years. Any construction period that exceeds 4 years is totally unworkable for the Permittees as such long-term interruptions to their livestock operations would irreversibly destabilize them, even to a degree that they could be vulnerable to bankruptcy. BLM has a wealth of knowledge as to grazing management and grazing systems. Allotment Management Plans and Planning are even a cornerstone element within the Federal Land Policy and Management Act, 43 U.S.C. § 1752(d). This would factually and legally indicate that BLM is capable of demanding from the applicant the specifics as to location and timing as to all phases from which BLM, Permittees, and Interested Publics could then comment to develop an AMP, assuming such specifics are compatible with maintaining and sustaining the Permittee's current livestock operation throughout each of the	These comments have been considered in adjustments made to construction timing and duration within the Star Lake allotment.

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		four (4) phases. Again, the lack of specifics as to location and timing unreasonably prejudices this entire process as against the Permittees and for the applicant, i.e., MVE, i.e., Wind Company.	
11204-30	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	E. Permittees requested for a "25 MPH speed limit" upon wind project roads See 2022 Comments, pg. 6. The 2022 Comments requested establishment of a "25 MPH speed limit" upon wind project roads during pre- and postconstruction phases and during the operational phase of the proposed Project (2022 Comments, pg. 6). The DEIS does not adequately address this issue. The DEIS reports that "speed limits" would be implemented to reduce potential impacts to livestock grazing from project-related traffic (DEIS, pg. 3-281) but fails to specify what speed any such limits would be set to for particular Project roads or road types. The DEIS references applicant-committed measure 33 and mitigation measure N "which establish speed limits on BLM roads and require project personnel to adhere to them" (DEIS, pg. 3-292) but again fails to specify what any such speed limits would be. The DEIS states that during construction "personnel would also be instructed and required to adhere to speed limits commensurate with road types, traffic volumes, vehicle types, and site-specific conditions to ensure safe and efficient traffic flow" (DEIS, pg. 3-371) but again fails to specify what any such speed limits would be set to for any "road types, traffic volumes, vehicle types, and site-specific conditions…". The DEIS reports "Project personnel during all project phases would be required to drive 25 mph or less on non-public project roads, be alert for wildlife, and use additional caution in low-visibility conditions when driving any vehicle (applicant-committed measure 33)." DEIS, pg. 3-97 (emphasis added). See also DEIS, pgs. 3-123, 3-457, 3-478, J-8, M-58, T-32, T-33, U-a-8, App3-5, App3-18, App3-22, and App4-6 (applicant- committed measure 33). The DEIS further states that MVE would "enforce a 25-mph speed limit on private project access roads (applicant-committed measure 33)." DEIS, pg. 3-504 (emphasis added). These DEIS statements indicate that a 25-mph speed limit would only be established and enforced for non-public (private) Project roads and do not specify any speed limits that would be established for roads on BLM administered public land or other public roads. The only statement in the DEIS that implies that a 25-mph speed limit might be established and enforced on all Project roads is in Appendix M where it is reported that all Project "personnel will obey posted speed limits (25 mph or less) on Project roads." DEIS, Appendix M, Lava Ridge Bird and Bat Conservation Strategy, pg. M-59). However, Appendix M previously explicitly states that the 25-mph speed limit is applicable to "non- public Project roads." DEIS, Appendix M, pg. M-58.	Specific speed limits are identified in measures evaluated in the EIS.
11204-32	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The Plan of Development attached to the DEIS includes Appendix F (Health and Safety Plan) which reports that the ROW associated with the proposed Project "will be maintained in a sanitary condition at all times" with all waste materials "disposed of at an appropriate waste disposal site" and defines "waste" as "all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ash, and equipment that are a result of the Project Team's activities." DEIS, pg. 694, Appendix 1, Plan of Development in its Appendix F, pg. F-3. Such waste disposal commitment would appear to indicate that MVE "assumes the cost and obligation" for "garbage removal adjacent to the roads" and all "as constructed" Project-related facilities during each phase of the proposed Project (2022 Comments, pgs. 7 & 9). The DEIS needs to clarify that MVE "assumes the cost and obligation" for "weed control" and "garbage removal adjacent to the roads" and all other Project-related facilities during each phase of the proposed Project.	The terms and conditions related to weed control and garbage removal are described within MVE (2023) and additional measures in EIS Appendix 4 (Mitigation).
11204-34	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	Table App4-2g (Applicant-Committed Measures – Fire) reports under Measure Number 50: "A fire protection and prevention plan would be implemented and would outline responsibilities, notification procedures, fire prevention measures and precautions, fire suppression equipment, initial response procedures, and post-fire rehabilitation strategies related to the Project" (DEIS, pg. App4-8). It is unclear if the responsibilities outlined by the fire protection and prevention plan include financial responsibilities associated with suppression and rehabilitation for Project-related fires. Table App4-2g reports under Measure Number 51: "The project team would be responsible for taking immediate steps to suppress a Project-related fire and would be responsible for post-fire rehabilitation" (DEIS, pg. App4-8). It is unclear if these project team responsibilities include paying for the costs associated with suppression and rehabilitation for "Project-related" fires. Furthermore, the DEIS does not appear to contain any measures to ensure that MVE is responsible for paying for the value of AUMs lost due to forage reductions from future "Project-related" fires. The DEIS needs to clarify that MVE would be responsible for paying for the costs associated with suppression and rehabilitation for "Project-related" fires, would be responsible for paying compensation for any lost AUMs resulting from "Project-related" fires, and would be responsible for paying compensation for any livestock injured or killed due to any "Project-related" fires.	Table App4-2g (in EIS Appendix 4 [Mitigation]) includes applicant-committed mitigation measures regarding fire and fuels management. Specifically applicant-committed measures 49 through 51 provide details on the [MVE] project team responsibilities for initial suppression and response. Per the BLM Fire Planning Handbook (H-9211-1), fire trespass refers to the occurrence of unauthorized fire on BLM lands where the source of ignition is a result of human activity and there is evidence of negligence or intent. For human-caused fires where negligence or intent can be established, actions must be taken to recover the cost of suppression activities, emergency stabilization and rehabilitation treatments, and damages to the resources and improvements. The BLM investigates and pursues cost recovery of any liable individual; this could include MVE. Also see response to comment 11204-14 (see in Table A-3p, Livestock Grazing), EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics), and the Grazing Coordination Plan (Appendix S in MVE [2023]). Permittees would not be compensated for minor permanent reduction in forage availability from the project (see EIS Appendix 12 [Historical Livestock Actual Use and Utilization]). Fire rehabilitation seedings have increased forage production across the project area, such that there is additional abundant forage available, above what is currently permitted. There is more forage available than what is currently in use and beyond what would be permanently affected. Following the Idaho Open Range Law (Idaho Code 25-2118), if project traffic injures or kills livestock, MVE would compensate those grazing permittees for injured or lost livestock.
11204-43	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	XI. Lack of information on decommissioning the wind project after its expected life has elapsed. See 2021 Comments, pg. 18. The 2021 Comments asked if the proposed Project is authorized, "what will happen when the useful life of the project ends or the economics result in the need to abandon the project" and "what is the plan for decommissioning?" The DEIS devotes significant space to discussing the decommissioning or final reclamation phase of the proposed Project and analyzing related impacts. However, the DEIS information regarding the decommissioning phase generally contains the same deficiencies that are discussed in detail above with respect to the construction phase.	As described in the EIS, the potential for impacts from the decommissioning phase would be similar to those described for the construction phase. Also see response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11222-2	Donald Campbell	I have not seen the requirement for "spinning reserve" addressed in any media or other informational sources. Wind across southern Idaho is not necessarily predictable. As such, any reliance on wind power of a project this	See Section 1.2 of MVE (2023). MVE's project aides in President Biden's administrative priorities as well as numerous state goals of using renewable energy sources. While wind may be variable, the project will reliably

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		size, or any size for that matter, requires a source of dependable power at least as large as that proposed. Thus, Idaho Power and/or another entity will need to have a dependable source of electrical capacity, in excess of that proposed by Lava Ridge, off-line but ready to deliver power at a moment's notice. The cost of providing "spinning reserve" is a requirement and cannot be ignored. Because electrical power cannot be effectively stored, a separate and dependable power plant has to be running 24/7/365. In other words, a coal-fired, natural gas fired, or nuclear plant has to be on-line and able to fulfill all electricity requirements when the wind stops blowing. This effectively nullifies any "climate change" benefits of having wind as a power source.	and economically produce renewable energy for power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation, or to a new substation, ultimately making the transmission of energy more reliable as energy use increases. GHG emissions that would be avoided if the project were constructed are described in EIS Section 3.4 (Climate Change and Greenhouse Gases).
11278-2	Daniel Eyre	This is only the first project. Blasting in this area will damage the cap on the aquifer, I am a retired army engineer, demolitions specialist and this was my specialty. These companies don't care about Idaho, this project will destroy our environment, just looking at the mortality rates will tell you this. This company, will declare bankruptcy at the end of the wind farm life and will leave Idaho tax payers with the burden of cleanup. And, has anyone noticed that is no recycle program for any of the windmills or materials?? Just some thoughts on phase one of a four phase program, which a lot of people do not know of.	See the Blasting Plan Methodology (Appendix I in MVE [2023]). The plan outlines how the blasting plan will be developed in coordination with the BLM to mitigate risks and potential impacts associated with blasting procedures. Overall, MVE (2023) includes several environmental protection measures to be implemented to mitigate impacts to water sources and wildlife. As stated in the environmental protection measures, blasting will avoid ground blasting within 1,000 feet of waterbodies and wells to the maximum extent possible. Regarding clean-up, MVE (2023) includes several appendices, including the Decommissioning Plan (Appendix L in MVE [2023]) and the Reclamation Plan (Appendix E in MVE [2023]), describing the decommissioning and reclamation of disturbed sites with goals to reclaim disturbed areas to conditions similar to the surrounding areas at time of reclamation with specific reclamation standards. The final Decommissioning Plan will be approved by the appropriate state and federal agencies, including the BLM. Additionally, MVE states they will prioritize the re-use, recycling, or scrap value of decommissioned project components as much as possible. See Section L-2 of the Decommissioning Plan that specifically discusses how decommissioned project components will be handled.
11285-1	Jerry K Dodds, Joellen Dodds	When they are no longer useful, how will they be removed? It will be a huge undertaking and more expensive than probably anticipated. There is better, new, technology available. Why is it not being esplored?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11188-5 (see in Table A-3jj, Legal or Policy Compliance).
11290-1	James Keating	The true environmental impact of products must be considered from cradle to grave - and that includes recycling and disposal. In fact. we have yet to devise any way to adequately dispose of or recycle wind turbines. Metal can be recycled but the composite blade material cannot. These will all have to be dissambeled buried somewhere. Where will that be? That will requre destruction of yet more land and ecosystems. Large windmill farms will mean large windmill graves at their end of use. How about all of the (fossil) energy that goes into production, installation, repair, and decommission of the many, many (hundreds of miles) of these towering turbines and high voltage transmission lines that must be used to connect these turbines? Again, this information is purposfully missing from the discussion.	See responses to comment 11344-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1) and comment 12976-12 (see in Table A-3f, Climate and Greenhouse Gas Emissions) regarding lifecycle emissions from wind energy. See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding turbine disposal.
11313-1	Name Not Provided	The Lava Ridge Project will have to take down and do some thing with the Windmill Blades and towers as they break down and are not longer project worthy. WHERE ARE THEY GOING TO BURRY ALL THAT OUT DATED AND USELESS EQUIPMET? What part of ranch and farm land will they need to use as there is a large mass of towers and blades to be installed with this project. The old mine shafts are not a very good idea that use either.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). See Section 6.0 of MVE (2023) for representative drawings and figures of project components.
11344-1	Richard Williams	First, these giant wind turbines are not carbon or oil neutral. The entire premise behind the efficiency of the these machines is skewed. By the times the machines would create more energy than it took to create them, the machines are typically needing major repairs or have fallen apart. This EIS fails to address the impact of continual repair and degradation of the blades where small erosion of surfaces will drip on the land and leach into the soil.	According to references summarized in NREL (2021), total GHG lifecycle emissions from wind power energy are estimated at 13g CO2e/kWh, whereas natural gas, oil, and coal are estimated at 37, 65, and 77 times greater, respectively. Other renewable energy sources range from 8 to 52g CO_2e/kWh, and nuclear is estimated at 13g CO_2e/kWh. Also see response to comment 11667-5 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding leaks and spills from turbines and the response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1) regarding leading-edge erosion and the potential for soil contamination. National Renewable Energy Laboratory (NREL). 2021. LifeCycle Greenhouse Gas Emissions from Electricity Generation: Update. Available at: https://www.nrel.gov/docs/fy21osti/80580.pdf. Accessed December 28, 2023.
11360-2	Sergio Arroyo Jr.	"Measure i: Blasting would not occur on days where wind speeds are expected to exceed 25 mph" DEIS V 1, 3-20. Idaho wind speeds vary in seconds, do they receive meteorological updates every second? Do they have a private fire crew on hand for every blast or do they rely on the BLM and taxpayer funded fire suppression? If they have a fire outbreak, will they reimburse the taxpayers since they are a private company, fire suppression should not be funded by taxpayers.	Wildfire ignition, spread, response, and suppression are analyzed in detail in EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression). Specific mitigation measures that would be implemented to minimize or avoid affects associated with project-related wildfires are listed in EIS Appendix 4 (Mitigation) and in Section F-6 (Fire Protection and Prevention Plan) in the Health and Safety Plan (Appendix F in MVE [2023]). Section F-6 also describes each entities responsibilities in the event of a project-related wildlife (see Section F-6.1). Additional fire protection measures specific to blasting are described in Section I-5.2 the Blasting Plan Methodology (Appendix I in MVE [2023]), which include posting fire suppression personnel at the blast site during high fire danger periods and prohibiting blasting during extreme fire danger periods. Blasting personnel will be equipped with portable weather stations (e.g., Kestrel), which allow wind speeds to be measured at the blast site. The MVE project team is responsible for initial fire suppression activities. Applicant-committed measure 50 states “The project team would be responsible for taking immediate steps to suppress a Project-related fire and would be responsible for post-fire rehabilitation. The project team would take aggressive action to prevent and suppress fires on and adjacent to the project areas. If a fire starts in the project area, the project team would initiate and implement fire suppression activities until relieved by the appropriate fire agencies. Fire suppression personnel and equipment would be dispatched by the project team within 15 minutes from the time a fire is reported.” The BLM is typically the primary fire responder on lands managed by the BLM, even when private infrastructure that poses heightened wildfire risk is situated on it. Currently, in addition to the BLM, rangeland fire protection associations (RFPAs), and rural volunteer fire departments throughout the project area also provide structural

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			fire protection and wildland fire initial attack within their jurisdictional boundaries. The closest forces concept, regardless of agency, is used to minimize response times to an incident on the BLM lands in the project area. See response to comment 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1) regarding financial responsibility for fire suppression.
11360-4	Sergio Arroyo Jr.	What are the credentials of the blaster, does he have experience in subsurface blasting? His credentials need to be scrutinized for the necessary experience and training for this specific depth. To put it in perspective, just because a guy has been blasting for 30 years doesn't mean he knows how to blast underwater. Local blasters largely have experience at shallow depth for footings, ponds, irrigation lines, and above ground road construction to remove rock, not underground over aquifer.	See the Blasting Plan Methodology (Appendix I in MVE [2023]). Blasting will comply with all applicable permits and laws, including the credentials of the blaster.
11372-3	Jamie Kohtz	The need for clean energy is actually causing tremendous waste. The turbine blades which are not easy to recycle, are piling up in states all over the US. Some are buried, while others are just sitting in piles at sites. The EIS does not address cleanup, recycling, etc. Where will the turbines be taken during decommission? Dumped in the desert? Idaho landfills? The waste and damage this does to the environment does not justify the clean energy gained from a windmill.	See responses to comments 11873-7 and 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11405-1	Gena Anderson	I have several concerns regarding this project, but want to focus on what happens to these wind turbines when they no longer operate. My understanding is that they are not recyclable, so where do they go? And will the concrete bases become a permanent fixture to our landscape?	See responses to comments 11873-7 and 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11411-4	Rayma Cates	Large transmission lines create an additional fire hazard for Idaho's farm and range land.	See the Health and Safety Plan (Appendix F in MVE [2023]). Section F-6 details Fire Protection and Prevention Plan. This plan details measures that will reduce the risk of starting fires and how to suppress fires in the event one does occur.
11411-7	Rayma Cates	Windfarms have a limited useful life and the land will not be returned to it's original condition.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). See also the Reclamation Plan (Appendix E in MVE [2023]).
11428-1	David Briggs	End of life for wind energy means dealing with replacing windmill parts every so many years. Blades aren't recyclable. They're huge.	See responses to comments 11873-7 and 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11463-1	Diane Christiansen	The proposed electric output is unproven and will not benefit Idaho.	See MVE (2023), Section 1.3 (General Facility Description, Design, and Operation), which discusses estimated output.
11466-1	John Arkoosh	The DEIS does not sufficiently evaluate the hazards of Ice throw, to humans and animals in the project area. https://www.americanexperiment.org/mn-wind-turbines-shut-down-over-safety-concerns-from-ice-updated/ https://savethehuronmountains.org/2018/06/26/a-wind-turbine-flings-400-lb-chunk-of-ice-1000-feet/ https://www.windsystemsmag.com/construction-24/ https://stopthesethings.com/2018/02/22/deadly-cool-wind-turbine-throws-ice-chunks-into-us-college/	Impacts to human health and safety are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-10, AIB-11, AIB-12, and AIB-13. In response to public comments, AIB-14—"Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public?"—has been included in the final EIS.
11487-3	Idaho Noxious Weed Control Association	However, the INWCA is concerned about the unforeseen effects from the disruptions to the environment, and movement of noxious weeds and invasive species across the landscape. If this project does take flight, the INWCA would strongly urge that the applicant or property owner take sufficient steps to create and follow a detailed plan to prevent, control and if it should occur, eradicate noxious weeds in the disturbed areas. [...] The Draft Environmental Impact Statement provides an overview of the noxious weeds and invasive species located in the project area. See Lava Ridge Wind Project, Draft Appendix R: Noxious Weed Management Plan. This plan is a starting point but needs to have the ability to adapt to current needs. It should be noted that there are always new chemistries emerging alongside innovative techniques on how to manage noxious weeds. Since this project will likely take years to complete, the management plan should provide flexibility for notifying the applicant of new species, and adapting or creating Best Management Practices for the applicant to stay up to date on preventing and controlling noxious weeds.	The most current version of the Noxious Weed Management Plan (currently Appendix R in MVE [2023]) will be provided with the final EIS. This is a draft plan, and prior to construction, the BLM would approve MVE's final plan.
11491-28	Dean Dimond, Jennie Bateman	2. no detailed description of maintenance and turbine failures,	Project O&M is described in EIS Appendix 11 (Project Elements Common to All Action Alternatives) and MVE (2023).
11491-36	Dean Dimond, Jennie Bateman	27. Disposal plan for retired turbines and all wind generation parts,	See Section F-5 (Waste Management Plan) of the Health and Safety Plan (Appendix F in MVE [2023]). See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (see in Table A-3l, Hazardous Materials and Solid Waste).
11496-4	Danielle Gunn	The project will also affect rural communities and how they currently function. Magic Valley Energy (MVE) has conducted reasonable outreach to affected permittees, rural communities, and other public entities to mitigate the negative impacts of the project. However, no contingencies have been developed to address unforeseen impacts. It is pertinent to provide flexibility to land users, particularly permittees, when unforeseen damage and impact occur. The final EIS must include a section for managing unforeseen or unexpected problems.	As described in the Grazing Coordination Plan (Appendix S in MVE [2023]): "During the construction and reclamation periods, MVE will provide a rangeland coordinator to act as a single point of contact for grazing permittees should issues arise during these periods of the project. The rangeland coordinator will manage the resolution of any project-related damages to range improvements and livestock conflicts with project activities. The rangeland coordinator will maintain frequent communications with grazing permittees to provide advance notice of construction plans in actively grazed pastures, ensure awareness of stockwater pipeline locations and functionality, ascertain permittees' plans for livestock movement between pastures, and undertake those actions deemed reasonable to facilitate a cooperative use of the public lands by both the grazing permittees and the project. The rangeland coordinator will also coordinate with the construction contractor to take corrective actions when dust emissions from construction activities are elevated, and to inform construction crews regarding best practices for construction tasks that occur in proximity to livestock."

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			Impacts to livestock grazing and rural communities are disclosed in EIS Section 3.9.1 (Grazing Allotments and Range Socioeconomics) and EIS Section 3.6 (Environmental Justice and Socioeconomics). Also see AIB-12, AIB-16, and AIB-20 in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief). See also responses to comments 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1) and 1042-14 (see in Table A-3z, Water and Wetland Resources).
11496-10	Danielle Gunn	The DEIS needs to identify who will be responsible for enforcing the EIS and Grazing Coordination Plan. The DEIS should analyze and answer the following questions: • Who will inspect equipment for weed seeds and hazardous materials? • Who will ensure weed free materials are being used so invasive and/or noxious plant and insect species are not spread to pristine areas? • Who will provide communication to permittees and how their livestock will be managed during construction phases? • How much time will be given for livestock permittees to move livestock when necessary? The DEIS and Grazing Coordination Plan state MVE will pay for all range improvements. However, it is not clear if MVE will pay for power bills for pumping water and other unforeseen expenses that occur as a result of disruption to our current livestock grazing practices.	The Construction Monitoring Plan (Appendix P in MVE [2023]) and the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) describe the procedures for implementing the mitigation measures described in MVE (2023), including the Grazing Coordination Plan (Appendix S in MVE [2023]) and EIS Appendix 4 (Mitigation). EIS Appendix 4 has been revised to include additional project-specific mitigation measures that provide further details on clarifications on required components of the Environmental Compliance and Monitoring Plan, the responsibility of MVE's compliance manager to monitor for and enforce compliance with required mitigation measures, and annual reporting requirements. Also see response to comment 11204-34 (see in Table A-3dd, Plan of Development – EIS Appendix 1). Regarding power bills to operate water pumps, see MVE (2023) Section S3.1. The rangeland coordinator will manage the resolution of any project-related damages to range improvements and livestock conflicts with project activities.
11504-2	Gary Smith	Until the full extent of potential damage to the aquifer can be determined a lease agreement should not be approved. The current Terms and Conditions do not cover the total damages and until fully understood this lease agreement should not be approved.	If approved, the terms and conditions will be included in the ROD after the final EIS and additional BLM-required stipulations are determined.
11516-1	Liz Niccum	I have lived here in this valley for 18 years and I am a meteorologist. I watch the weather daily, I pay attention to the effect the Magic Valley has on weather systems and for the what kind of long range weather scenarios form during the different seasons. The Magic Valley is located at the widest part of the terrain in Southern Idaho and storms tend to weaken here. In the summer, we have persistent days of no winds. Will a wind farm produce sufficient energy to justify its presence here? Will non-renewable fossil fuels come to the rescue when wind production is low? Will intense winds aloft stress and then topple the massively tall towers as has happened in other countries?	Applicants are required to demonstrate financial and technical capability as part of the BLM ROW application process. MVE (2023) Section 1.6 (Financial and Technical Capability of Applicant) provides this documentation.
11534-17	Matt Arnold, William Eubanks	The DEIS Fails to Examine the Project's Risk of Ice Shedding and Ice Throw, Including Strategies to Mitigate that Risk As with any tall structure built in Idaho, wind turbines can and do accumulate ice when ambient temperatures reach freezing or near-freezing temperatures. As temperatures or operating conditions change, this ice may then be "shed" from or "thrown" by the turbines. This has serious safety implications for those people and livestock nearby the Project site, as "[a]ny ice that is accumulated may be shed from the turbine due to both gravity and the mechanical forces of the rotating blades." David Wahl & Philippe Giguere, Ice Shedding and Ice Throw – Risk and Mitigation, GE ENERGY, https://invent.ge/3nYqk25 (last visited Apr. 11, 2023). In fact, "rotating turbine blades may propel ice fragments some distance from the turbine—up to several hundred meters," which "may cause damage to structures and vehicles, and injury to site personnel and the general public, unless adequate measures are put in place for protection." Id.; see also Colin Morgan et al., Assessment of Safety Risk Arising from Wind Turbine Icing, BOREAS IV, March 1998, https://bit.ly/3MA5eBF (proposing guidelines to address turbine icing risks). This danger is increased by the fact that the Project includes turbines that are significantly larger and will operate at a higher speed than any existing wind project. The DEIS does not examine the Project's potential for ice shedding or throw, or how these risks can be mitigated. This should be addressed in the final EIS.	See response to comment 11466-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11535-68	Steven Andersen	Moreover, the DEIS does not speak to the type of roads that will be constructed or what materials will be used for construction. Presumably, sand, gravel and quarry stone would be needed during the construction phase. These materials would most likely be mined as close to the potential wind energy development site as possible. If existing quarries were not used to provide these resources, excavation from a new source would disturb the land surface…creating the potential local soil erosion. Thus, as described in the opinion from Civil Science (Exhibit 51), road construction has a much wider impact than is outlined in the DEIS.	See response to comment 11499-1 (see in Table A-3aa, Wildlife, including Big Game) for a description of the analysis of access road construction and improvements in the EIS. Refer to the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]) for details on road design and construction.
11535-119	Steven Andersen	Without engineering, turbine models, and siting specifics, the wake effects and consequent performance of the turbines cannot be known or analyzed. Wake effects can significantly decrease power production and increase electricity costs.351 Wake losses occur when wind speed is below the rated value and turbines are partially aligned to the angle of the incoming wind. Wake effects are complex and involve a variety of factors including turbulence and rotation; cumulative effects; distance between turbines (wake increases when wind turbines are placed in close proximity to avoid land and transmission line constraints).352 Wake effects can degrade wind farm efficiency by 40%.353 As discussed in our comments regarding site suitability, anticipated wind speeds in the proposed project area are anticipated to be deficient, and there are no specifics regarding siting or models of the turbines, let alone the necessary detailed analysis of predicted wake measurements to gauge productivity, whether the project is even "efficient" and to assess potential mitigation measures against underperformance.	As described in Section 1.3.4 of MVE (2023): "Several factors influence the number and size of wind turbines for any given project and make it impractical to identify with certainty the exact characteristics of the turbine during the early development stage. Manufacturers' advancement in turbine technology during the wind project development period can offer opportunities to deploy more efficient models that are better suited to the Project area's wind resource. Ultimately, the selection of a specific turbine model is an iterative process that considers the wind resource, siting constraints, mitigation requirements, and the timing of a specific turbine's availability in relation to the construction schedule. While the specific turbine model and its associated size characteristics will not be known until late in the development phase, MVE is able to define the anticipated range of potential wind turbine units that may be sited within the Project including the number of units as well as a range of key sizing characteristics." As described in Section 1.3.5 of MVE (2023): "The preliminary turbine locations have been proposed within siting corridors to allow for the flexibility to microsite individual turbines based on site-specific engineering or resource constraints. . . . Should MVE identify an engineering issue within the proposed turbine locations, or determine that relocating proposed turbines to alternate turbine areas will increase project efficiency, MVE may elect to make that adjustment. . . . Final

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			placement of the Project components will be informed by environmental constraints and site-specific engineering considerations including, but not limited to, geotechnical, topographic, and wind resource properties." As described in Alternatives Considered by MVE (Appendix C in MVE [2023]), MVE considered multiple sites for the project and selected this location with the help of the latest computer modeling software and assistance from leading consultants in meteorology and wind development. Emphasis was also placed on avoiding impacts to important and priority sage-grouse habitat.
11536-5	Richard Llewellyn	Moreover, the responsibilities of the applicant, the methodologies that will be employed, and the incremental and final evaluation procedures of restoration are either absent, vague, referenced in documents not easily available to the public, or left for future determination by the BLM. As such, the EIS fails to provide the public any assurance that undefined restoration efforts will ultimately be successful in part or whole. For example, the EIS states in multiple locations "Apply applicant-committed measure 98 at the soonest appropriate time of year recommended by a BLM Botanist (and prior to the following growing season) to avoid invasive species establishment." However, this measure 98 is not defined within the EIS, and attempts to locate it in the associated documents (eg the Lava Wind Project POD June 2021) show only a 'measure 98' that deals with counting bird carcasses to assess turbine caused mortality. As 'measure 98' is evoked to reduce 'the likelihood of introduction and spread of nonnative plants' – a likelihood that is the subject of so many research projects that, if successful measures are discovered or developed, will lead to reliably successful restoration efforts – it is essential that this measure is described in full within the EIS.	Applicant-committed measure 98 is now measure 101 in Table App4-2k (Applicant-Committed Measures – Weeds and Vegetation): "MVE would comply with the applicable Federal and State Laws and regulations concerning the use of herbicides and other similar substances in all activities/operations. Herbicides would be used only in accordance with their registered uses and within the limitations imposed by the Secretary of the Interior (BLM 2019a). Prior to the use of herbicides, MVE would obtain from the BLM a written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary. Herbicides would not be permanently stored on public lands, and applicator(s) would hold a current applicator's license or be under the direct supervision of a licensed applicator. MVE would provide an annual report to the BLM to report type and quantities of herbicides applied to public lands." MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria. Applicant-committed measures, as well as other mitigation, were further clarified in the final EIS. Appendix 4 (Mitigation) details reclamation efforts in Table App4-2o (Applicant-Committed Measures – Reclamation and Decommissioning). See also BLM-required measures P and Q. Refer to the Reclamation Plan (Appendix E in MVE [2023]) for additional details on reclamation methods and requirements.
11536-7	Richard Llewellyn	The expected efforts, liabilities, and responsibilities of the applicant for sage steppe restoration that are described within the EIS demonstrate a remarkable incongruence with the general scientific consensus of uncertainty, long time frames, and dependence on ever less predictable precipitation patterns for initial establishment that make almost guarantee that many if not most of the restoration efforts will require repeated application before success. For example, the following paragraph (EIS 3-381) describes the applicant (MVE) responsibilities with respect to restoration, but the referenced MVE[2022] could not be located online. "MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria for MVE's vegetation treatment and weed management plan. The goal of reclamation would be to establish vegetation communities in disturbed areas that are comparable to the vegetation community in adjacent undisturbed areas. Postconstruction reclamation monitoring would be conducted by MVE and would include qualitative and quantitative (line-point intercept transects, etc.) assessments of the cover and diversity of vegetation present after reclamation. MVE has committed to up to 5 years of reclamation monitoring (applicant-committed measure 164). If desired cover and diversity thresholds (see Appendix E in MVE [2022] for details) have not been met after 5 years, MVE would coordinate with the BLM on possible adjustments to the criteria or the use of adaptive management procedures to address revegetation challenges. However, BLM policy requires desired plant communities to be restored in all disturbed areas (required mitigation measure P). Use of irrigation (as necessary) and mulching would also be required to expedite interim reclamation in work areas (required mitigation measure Q)." Those criteria that are described are vague – eg "are comparable to the vegetation community in adjacent undisturbed areas," while applicant responsibilities are appallingly inadequate "MVE has committed up to 5 years of reclamation monitoring" – in this case, an order of magnitude less than the 84 years that the agency expects for revegetation efforts to mature (34 years of construction to decommission, plus 50 years of plant community development). Compounding the discrepancy between agency expectations and applicant responsibilities is "If desired cover and diversity thresholds (see Appendix E in MVE [2022] for details) have not been met after 5 years, MVE would coordinate with the BLM on possible adjustments to the criteria or the use of adaptive management procedures to address revegetation challenges."	See the Reclamation Plan (Appendix E in MVE [2023]) for success criteria after temporary and permanent disturbances. See the Decommissioning Plan (Appendix L in MVE [2023]) for reclamation efforts after decommissioning.
11547-6	Lowell Ihler, Carol Ihler	Even though LS Power would have to put up a bond to "ensure" the wind turbines would be decommissioned, nothing can assure us that they would be removed and the land returned to its native state. After so much upheaval and 400+ miles of roads this can't be undone. Even the the concrete bases would not be removed. No one can know what the cost will be in 20 years or so to remove the turbines so a bond is only a start as to the actual cost. Who is to say if LS Power will even be around in 20 years and who will be responsible then?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
11552-1	Summer Osmond	The poor plan of development submitted by Magic Valley Energy LLC is laughable, and vague at best in so many critical areas, such as preconstruction, water rights, water development and use, mitigation measures, construction, postconstruction and reclamation. It is unstated what the amount of water that the company's construction will require, and where this water will be found. Is the Magic Valley Energy LLC also applying for water rights for the construction phase as well as the postconstruction fire abatement? If not, where will this water be found and used come from? Even during the construction phase, they mention the use of water to dig through the rocky ground to install the bases for the wind towers. Where will this tremendous amount of water come from? There are no specific details listed for any of their planned water uses as to how they plan to acquire those waters.	See Section 1.3.11 of MVE (2023) for water usage, amounts, and sources.
11552-4	Summer Osmond	The project is proposed to function for 34 years, but what is covered in the reclamation plan? Will the entire site, including all of the roads be reclaimed, and how do they plan to remove the bases of the wind tower? What is the bonding in a project of this size and scope?	See the Reclamation Plan (Appendix E in MVE [2023]) for details regarding reclamation. See also the Decommissioning Plan (Appendix L in MVE [2023]). See comment 11598-22 (see in Table A-3dd, Plan of Development – EIS Appendix 1) for bonding information.

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11576-3	Kelly Human	What about the waste that is generated by lava ridge? Where are they going to recycle the worn out parts?	See responses to comments 11873-7 and 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11598-22	Idaho Conservation League	Reclamation Reclamation is a key component of large projects like Lava Ridge being proposed for public lands. According to the DEIS, the project proponent is required to have a reclamation bond in place prior to beginning substantial work on the project. We request that MVE's Reclamation Plan be made available for public review and comment. The BLM should disclose additional information in the FEIS regarding the expected amount of the reclamation bond, how it is calculated, the discount rates, when it is anticipated to be finalized (if the project moves forward) and the financial mechanism. We note that the BLM recently included bonding estimates in the draft Environmental Assessment for the Granite Creek Place Mining Project in the Four Rivers Field Office. The BLM should also provide additional details regarding how and where the wind turbine blades will be disposed of, as this is a long-standing concern associated with wind energy projects.	See response to comment 11536-5 (see in Table A-3dd, Plan of Development – EIS Appendix 1). The Reclamation Plan is provided as Appendix E in MVE (2023). MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria. The bond is typically attached to the notice to proceed, after the ROW grant is authorized, but prior to ground disturbance. Additional details on the reclamation bond and the reclamation cost estimate have been added to EIS Appendix 4 (Mitigation) as applicant-committed measure 164. The Decommissioning Plan (Appendix L in MVE [2023]) provides additional details on decommissioning, including disposal of turbine blades.
11615-3	Spencer Dixon	It is a huge waste of resources to tear up our wilderness only to "reclaim" it in 30 years when the decommissioning starts. I do not think it is adequate land bond protection to ensure the project will be decommissioned properly. There will be a greater need for electricity in the future so to plan on the removal in 30 short years seems to be the height of corporate greed and government complacency if this is allowed. These turbines are offshore size and and not been studied for on land use	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
11635-1	Bucky Whittier	The depth of these turbines cannot be as shallow as we've heard. For 700' structures and with the Southern Idaho winds they have to be closer to 200'+ deep, as in specifically, 192' in the North Sea. They must also have to include massive guy wire assemblies, further degrading the landscape.	See response to comment 11833-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11670-2	Greg Bryant	Who pays for the backup energy when the wind doesn't blow?	In the event the project does not output the expected energy due to unforeseen circumstances, energy is still delivered onto the grid through existing connections and sources. The presence of the Lava Ridge Wind Project would only increase grid stability, but would not decrease energy stability if not built or experiencing an unforeseen event.
11686-1	Joan Hurlock	Please accept my comment regarding the Lava Ridge Wind Project DEIS as it relates to the health of public lands and the shedding of tons of microplastics across the desert. Wind turbine blades are composed of balsa wood, fiberglass, and epoxy, with Bisphenol-A (BPA) comprising approximately 40% of the epoxy. BPAs are frequently banned substances due to their link to almost 80 diseases, including testicular cancer, and reproductive disorders. BPAs are also known as endocrine disrupters and neurotoxins. Studies have shown that wind turbine blades experience "leading edge erosion", which is the shedding of the epoxy coating, due to wind, rain and hail. One turbine will shed about 136 pounds of BPAs annually. It has been estimated that a 400 turbine project will shed almost 25 TONS of these toxic chemicals per year. Here is a link to the article where information about microplastic shedding can be found: https://breakingviewsnz.blogspot.com/2023/02/ian-bradford-more-problems-with-wind.html <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fbreakingviewsnz.blogspot.com%2F2023%2F02%2Fian-bradford-more-problems-with-wind.html&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C527970c7cc154df994bd08db40f11ff9%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638175176595480024%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Nd%2BtgQCqj7yX9gxKIRlDleGzD1KAiM7MWzMrvs19idY%3D&reserved=0> Noticeably absent from the DEIS is any study related to the shedding of microplastics from wind turbine blades. How far are the epoxy resins distributed across the land? What effects will tons of BPAs strewn across the desert have on water quality, especially with the Snake River Plains Aquifer below the surface of the Lava Ridge project? Will these BPAs leach in to the groundwater? The mission of the BLM is "to sustain the health, diversity, and productivity of public lands…". How will the shed BPAs impact the health of wildlife, livestock, humans and agricultural crops in the surrounding area? Will the milk produced from the nearby organic dairies be contaminated with BPAs? How does blade shedding facilitate the BLM's mission of sustaining health? Will LS Power/Magic Valley Energy be held liable in the ensuing years if there is an increase in cancer rates, infertility, or other health problems?	The referenced opinion piece (Bradford 2023) was based on a self-published report by The Turbine Group (2021) that did not undergo peer review. Further, this report was based on a study of uncoated turbine blade tips (where blade speed is highest and erosion is most severe) under worst-case conditions and was later refuted by the author of the original study (American Clean Power 2023). As noted by American Clean Power (2023), in real-world conditions, blades are coated with nontoxic materials to protect the epoxy/fiberglass layers of the blade itself, with extra reinforcement along the tip. Thus, the limited amount of material shed from erosion of the protective layer is generally nontoxic. Additionally, the epoxy glue used to manufacture turbine blades contains only microscopic traces of BPA after the epoxy hardens in the factory, prior to delivery to the project site. Thus, there is extremely low potential for emissions of BPA or other potentially harmful chemicals, and no further analysis is warranted. American Clean Power. 2023. Claims vs. Facts: Microplastics and BPA in Wind Turbine Blades. Available at: https://cleanpower.org/resources/microplastics-and-bpa-in-wind-turbine-blades/. Accessed January 5, 2024. Bradford, I. 2023. Ian Bradford: More problems with wind farms. Wind Turbine Blades are Shedding Tonnes of Toxic Microplastics. Available at: https://breakingviewsnz.blogspot.com/2023/02/ian-bradford-more-problems-with-wind.html. Accessed December 28, 2023. The Turbine Group. 2021. *Leading Edge erosion and pollution from wind turbine blades, 5th edition - English*. Available at: https://www.researchgate.net/publication/353395665_Leading_Edge_erosion_and_pollution_from_wind_turbine_blades_5_th_Edition_-_English. Accessed January 5, 2024.
11722-1	Charlotte Erickson	Also concerns about how we dispose of wind turbines.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11740-3	Logan Dimond	Furthermore, there are concerns about the manufacturing and disposal of wind turbines, which require significant amounts of raw materials, energy, and water for their production, and can generate waste and emissions during their manufacturing and decommissioning processes. Additionally, wind turbines have a finite lifespan and need to be replaced after a certain period, resulting in additional waste and potential environmental impacts	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11747-3	Eric Hess	5.What guarantees do we have that the turbines will be completely decommissioned and where will they be disposed of, leaving a pockmarked landscape of concrete foundations?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11411-7 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11753-6	Mary Rios	These wind turbines will have to be shut down if the Idaho winds get to be 50 mph or higher. Windstorms occur from October to July in this state, according to www.nrc.gov. That is 10 months out of the year. So, with that information, how often will these turbines be shut down and not working? What research has been done on that?	As stated in Section 1.3.7 (Ancillary Facilities and Buildings) of MVE (2023), "Multiple permanent meteorological towers will be placed in the Project area to monitor the weather conditions and inform efficient operation of the wind turbines."

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			As stated in Section C-2 (Alternative Project Locations) of the Alternatives Considered by MVE (Appendix C in MVE [2023]), the project was sited "with the help of the latest computer modeling software and assistance from leading consultants in meteorology and wind development."
11782-3	Ken Fitch	And indeed, the applicant for the adjacent project is under no such long -term requirement for a venture that has been stated in one of the presentations as for a 30 years span. After 30 years, what happens then? Abandonment or reclamation, or new innovations and innovative contraptions corresponding to the delivery mechanisms in vogue at that time?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11411-7 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
11833-2	Bob Hassoldt	Returning to Appendix M, section 5.3.1, Operational Procedures, Facility Operation, lines 23-25, is the following: "MVE will feather the turbine blades when wind speeds are below the manufacturer's cut-in speed, which will significantly reduce rotational speed during periods when the turbines are not generating power." While that is a common mitigation procedure the question is: What is the cut-in speed of these turbines? That figure is not presented in any of these documents and doesn't look like it can be since MVE hasn't designated a turbine manufacturer at this time. That adds another measure of uncertainty to this analysis.	Section 1.0 of MVE (2023) discusses turbine selection and associated characteristics.
11871-112	WildLands Defense	Turbines Are Falling Apart, and May Cause Wildfires A recent news article describes: "The skinny blade, as tall as an 11-story building and weighing more than four Toyota Camrys, soared the full length of a football field. It plowed a furrow 4-feet deep in the wheat stubble where it eventually landed. Heavy-duty bolts that once kept the blade fastened to the tower scattered around the turbine base like shrapnel, some spiked deep into the soil. "Someone could have been killed or badly injured," said Kathryn McCullough, whose husband, Kevin, farms under about half of Biglow Canyon's turbines – including the one that lost its blade. The broken bolts preceding the incident weren't the only warning signs of problems at PGE's flagship wind facility, which opened 15 years ago amid a push to expand green energy technology in Oregon and nationally. But it took the so-called "blade liberation" for PGE to take urgent action at Biglow Canyon, one of Oregon's largest wind farms, shutting down all 217 turbines for testing and keeping some out of service for at least four months." Also: "An investigation by The Oregonian/OregonLive has found that the seemingly isolated blade incident is part of a wider set of maintenance problems and equipment failures that are now undercutting electricity generation at Biglow Canyon, shortchanging ratepayers and landowners, and putting those who cultivate crops under the turbines – and potentially their farmland itself – at risk. Among the findings: • PGE has failed to report public safety incidents at Biglow Canyon, in potential violation of its operating agreement with the state. The utility hasn't disclosed incidents where hatches, metal disks and blade bolts have fallen off turbines from a height of about 265 feet. PGE has questioned whether such incidents meet the reporting threshold, but regulators insist even small objects may be a hazard to anyone near a turbine because they can reach almost 90 mph when falling. • PGE knowingly operated at least four turbines at Biglow Canyon with broken blade bolts, in one case for nearly a year, maintenance records show. Those bolts clamp blades to the rotor and bear the stress of wind and motion. Research indicates that broken bolts, while not uncommon, can become a serious problem leading to catastrophic blade failures like the one in February. • Oil leaks from Biglow Canyon's wind turbines and transformers are environmental and fire hazards. The turbines have been plagued by leaks of oil and lubricants that coat towers and blades and spit on to their gravel pads and surrounding fields. Transformers have ruptured regularly, causing two fires and spilling about 3,000 gallons of mineral oil into surrounding soil that prompted expensive cleanups. • The number of problems PGE has disclosed to regulators is out of line with other wind farms. Since 2010, PGE has reported more than a dozen oil spills and other incidents at Biglow Canyon with the potential to affect public safety — about three times more than any other wind farm regulated by the state. But state officials only recently began pressing PGE to explain those troubles.	See Section F-6 (Fire Protection and Prevention Plan) in the Health and Safety Plan (Appendix F in MVE [2023]); the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]); and Section 4.0 (Operations and Maintenance) of MVE (2023).
11871-114	WildLands Defense	Catastrophic failures typically result from a cascading set of events. "Usually, the first bolt will break due to fatigue, and after a number of other bolt breakages the rest will break due to overload," he wrote. https://projects.oregonlive.com/wind-farms/ There is much danger and risk from these industrial wind facilities, and they have no place on public lands where perennially under-staffed BLM will not sufficiently be able to track harms. As WLD found when reading the very old Monument RMP, BLM was supposed to produce a Pronghorn Plan for the animals in this area of Idaho – and never got around to doing one – between 1986 and 2023! How can the public be expected to believe this facility will be sufficiently monitored and compliance with any "mitigation measures" and safety matters will be enforced?	See Section 4.0 (Operations and Maintenance) of MVE (2023), which outlines routine, long-term, and emergency maintenance. See also Section 2.0 (Roles and Responsibilities) of the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) for information regarding the roles and responsibilities.
11873-5	Mary Schwartz, Frank Schwartz	5. Since wind power is not economical without being heavily subsidized, there is a significant risk associated with the potential abandonment of the project infrastructure at the end of the design life, or sooner if the subsidies are ended sooner. The US taxpayers and residents of the state of Idaho would be saddled with this legacy. A mandatory component of all of these wind projects should be that the companies (developers and operators) are required to pay into a fund over the life of the project that will cover the complete costs of decommissioning, cleanup and restoration of the project sites at the end of life. The fund that these companies pay into should be administered by the state of Idaho, and not the Federal government, to assure the complete removal of all associated infrastructure is in fact accomplished. Without having such a fund, no wind or solar projects should ever be considered. The BLM should never allow a project such as this to proceed without having the financial assurance covering the complete removal of infrastructure and restoration of the impacted area.	See the Decommissioning Plan (Appendix L in MVE [2023]) and the Reclamation Plan (Appendix E in MVE [2023]). See comment 11598-22 (see in Table A-3dd, Plan of Development – EIS Appendix 1) for bonding information.
11873-8	Mary Schwartz, Frank Schwartz	8. The DEIS Appendix 11 indicates that the battery storage system will be electrochemical batteries. The DEIS currently does not evaluate potential environmental impacts associated with battery storage system and passes	See AIB-45 in EIS Appendix 3, Issues Analyzed in Brief: How would hazardous materials and wastes generated by the project be managed? Would they exceed capacities of approved disposal facilities?

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		it off as something that will be defined after an alternative is selected, but indicates it will support thousands of megawatt hours of storage potential. This battery storage system represents a large hazard and safety issue for the project. These electrochemical batteries are hazardous material and represent a large hazardous waste legacy at the end of life. There is no analysis in this DEIS for this environmental hazard during transportation, installation, operation and decommissioning and the associated potential environmental impacts. While it is understood that details get finalized during design, the DEIS should be providing an enveloping analysis, covering the range of potential scenarios associated with the batteries and system. The DEIS is incomplete without addressing the potential significance of this impact.	
11899-1	Diana Nielson	In the draft EIS I can't find the OSHA standards mentioned. I can find where Berming is mentioned in areas in case of leaks, and dust abatement, but nothing of who will respond in case of an emergency.	Emergency response procedures are described in the Health and Safety Plan (Appendix F in MVE [2023]). Spill control measures are described in the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]).
11899-3	Diana Nielson	Between fuels, explosives,Solvents, human waste, oil leaks we need to have a inventory list with the MDS sheets. The public and the workforce need an actual functional disaster plan that Community Hospitals can provide life saving procedures with the appropriate information. Will the employees be educated? Who will be in charge of Hazard recognition and where will contaminates be disposed? Where will the Toxic chemical lists be available and where will the MDS be kept?	See the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]).
11899-4	Diana Nielson	Will this project follow the EPA standards? Lava Ridge Wind Turbine Project mentions they need to acquire the Storm Water Protection Plan SWPP from the EPA. In areas so porous they are used for recharge and are over the Snake River Aquifer that is a Single Source Aquifer, who will be held accountable if their SWPP fails?	See the Stormwater Pollution Prevention Plan (Appendix D in MVE [2023]).
11915-4	Kim Peyman	Will these batteries be disposed of in Idaho, or is there a plan to recycle these batteries? To what expense and for whom? What becomes of the 700 gallons of crude oil and hydraulic fluid that each turbine needs to operate? Replacement of these fluids is necessary every nine months. So, over their lifetime of 20 years, replacement of these fluids will be done at least 27 times per unit. You do the math (27 x 700 x too many). I thought the idea of these wind farm projects was to reduce the use of fossil fuels. This does not sound to me like a reduction in fossil fuel usage. How many roads are going to be "improved" to afford big rigs access to these turbines in order to build and service them? In the words of Joni Mitchell, "They paved paradise, put up a parking lot!"2 Please do not allow this to happen to our public lands. I wonder what will become of those huge towers and blades when they can no longer be of service in 20 years? Will they remain as an obnoxious, alien part of our backyard? Will they end up in our landfills? This whole wind farm proposal seems to add up to a very toxic arrangement for the residents of this affected area (animal and man alike), and potentially, for the State of Idaho.	See responses to comments 11873-7 and 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
11962-4	Cassie Christensen, Tyler Christensen	Also in regards to the Carbon Exchange, what will happen when the mills are dismantled? Currently, the only way to recycle a windmill is to ship it back to China. Will this also be factored into the Carbon Emissions put off by this project? What about the construction of the turbines? 3Do they ever offset their emission of complete building and disposal, especially because they only have a lifespan of 20 years?	See response to comment 11873-7 and 11926-11 (see in Table A-3l, Hazardous Materials and Solid Waste) and comment 1042-10 (see in Table A-3f, Climate and Greenhouse Gas Emissions).
11962-10	Cassie Christensen, Tyler Christensen	Will Magic Valley Electric also be responsible for the replacement/repair of our county roads? The entry point also has not been stated and in order to gather such a plan, shouldn't the proposed travel path be determined before the project could be approved? In Appendix J-a Figures there are multiple diagrams for 2.0-3.0 MW turbines presented, this information is irrelevant to the 6.0 MW turbines which have been proposed. Even in Volume 2a-Page 7, only a 3MW example is used. What research has been presented on the 6 MW turbines? How will the development plans change for the larger turbines? I would assume that they would need to double, possibly triple the road width, subgrade and aggregate thickness, turn radaii leading to the site on public and country roads. What will happen if there is a house close to the road? How do they propose to work around structures that are already in place? Who will be responsible for roadways (even though all of the money from this subsidized project will come from tax payers money one way or another, but will it be Federal or State)?	See MVE (2023), which describes turbine information, road construction and road maintenance.
11970-2	Janet Keegan	V2A, Appendix 1, 5.1.4, page 66: Cultural and Historic Resource Sites and Values: This section of the POD is so vague it is laughable. As stated above, the MNHS and MWRC is a well-known site to LS Power the mother company of MVE. There is no mention of the sites in the POD. The date of the original application by MVE to the BLM is not published in the DEIS. However, it is known that the BLM notified the grazers of the project as early as 2020 and was in negotiations with them regarding mitigation. The JA Community was not notified until 2021.	See response to comment 9080-24 (see in Table A-3jj, Legal or Policy Compliance).
12018-1	Jerry Davis	The lifetime of the blades is appropriately 20 years. The replacement of the blades requires that the old ones be dealt with. To date nothing has been created to deal with the blades but to bury them. Burying them close by is the preferred method since they are very expensive to move to another location.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
12050-2	Roger LeRoy Miller	You have also left out how you plan to replace the blades when they are no longer useable. Will you then create enormous blade graveyards? What will be the environmental impact then? Why is there no estimate of the estimated life expectancy of each blade?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
12057-5	A. Ben Crouch	7. What about a decommission plan? When Magic Valley Energy pulls out in 30 years, are they planning on removing all of the foundations? What will they do with the actual windmills when they are done?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).

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12233-6	Elizabeth Lampert	The EIS does not mention the potential damage or mitigation to the underground aquifer as 400 wind turbine footings would need to be blasted into the rock formation above said acquirer as part of construction. In fact, the EIS does not give the approximate dimensions of a footing to accommodate the wind turbine structure. The EIS does however dimension the height and width of the wind turbine to be between 390 to 740 feet tall. Why not mention the footing size.	See response to comment 3140-3 (see in Table A-3j, Geology) along with the General Facility Description, Design, and Operation (Section 1.3 of MVE [2023]) for information about the turbine size. Also, as mentioned in the Blasting Plan Methodology (Appendix I in MVE [2023]), "blasting will be used only in areas where traditional excavation and earth moving equipment and practices are unable to accomplish the excavation."
12307-12	Dean Dimond	no detailed description of maintenance and turbine failures,	See Section 4.0 (Operations and Maintenance) of MVE (2023).
12307-16	Dean Dimond	no wildland fire prevention with plan for emergency shutdown of wind turbines, 5. No provision for access in prescribed burning for sagebrush as required treatment for habitat greater prairie sage leks and sagebrush communities,	A Fire Protection and Prevention Plan was provided with the draft EIS in Section F.6 (Fire Protection and Prevention Plan) in the Health and Safety Plan (Appendix F in MVE [2023]). Impacts to Fuels Reduction and Habitat Restoration Projects are disclosed in EIS Section 3.7.2 (Fuels Reduction and Habitat Restoration Projects).
12307-19	Dean Dimond	Disposal plan for retired turbines and all wind generation parts,	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
12307-30	Dean Dimond	Seasonal access including snow/ ice load on wind turbines including breakdowns and access for snow and grass fire fuel load removal,	See AIB-37 and AIB-39 in EIS Appendix 3 (Issues Analyzed in Brief) for a description of impacts related to access for road maintenance. Additionally, AIB-14 was added to the final EIS to disclose impacts from turbine ice throw. Impacts to fuels management are analyzed in EIS Section 3.7 (Fire and Fuels Management).
12454-2	John MacMillan, Kathy MacMillan	the Lava Ridge Wind Project lists in its description that the "project area spans 197,474 acres" or 308.6 square miles which is approximately 1/3 the size of the state of Rhode Island! The project components and infrastructure "includes corridors which are to be one half mile wide and cover 84,385 acres" which is 131.8 square miles; this is an enormous Idaho land mass to turn over to this or any company. They conclude by stating that "the project infrastructure proposed within the corridors is estimated to have a 2,374-acre footprint and a total disturbance of 9,114 acres." The calculation discrepancies in their area of impacted acreage are not only huge, but mind boggling! No one can overlook the difference between 9,114 acres and 197,474 acres.	The "general project area" under Alternative B is 197,474 acres, which is the general area within a polygon around the project site. It is larger than the area that would be disturbed. The "siting corridors" (as described in EIS Section 3.1.2.3 [Siting Corridors]), are approximately 0.5-mile-wide corridors where infrastructure would be sited. The "ground disturbance" would be the actual work area or infrastructure disturbance within the siting corridors. This is summarized in EIS Table 2.4-1. The actual ground disturbance from the project would be substantially smaller than the overall project area or even the siting corridors.
12776-1	Brian Olmstead	The Time to construct this giant Wind Energy Project along with all power lines, transmission lines, new roads etc is completely misleading. This is one of the largest construction projects ever built in the State of Idaho, and it is not even in the realm of possibility that LS Power could complete it in two years! LS Power knows, you know, and I know that with the scope of this project, the present supply lines, labor availability, cement availability, steel availability, and all the weather, terrain, and access problems, this project will take a minimum of 5 years to complete. All of the wildlife disruptions, ranching disruptions, county road disruptions, noise disruptions, quality of life for neighbors etc. are completely underestimated by this ridiculous attempt at a DEIS. LS Power has no intention of getting this project done within the timeframe they propose.	See Section 1.1 (Introduction) of MVE (2023). MVE's anticipated schedule for the Project includes: 1) a development period during which the applicable permits and approvals are sought, targeting completion of development during the second calendar quarter of 2023; 2) an approximately two year construction timeframe with initial commercial operations commencing during the fourth calendar quarter of 2025; 3) an operation phase of up to 30 years; and 4) a two year decommissioning phase that would occur if the right-of way ("ROW") grant is not renewed. See also Section 2.3.3 (Project Phases and Duration). The project is proposed such that the entire development may be constructed in a single continuous period or divided into two or more individual subphases that entail a portion of the overall project. The EIS analysis assumes an approximate project schedule consisting of three phases: 2 years of construction, up to 30 years of operation and maintenance, and 2 years of decommissioning for Alternative B. Alternatives C through E and the Preferred Alternative would have the same operation and maintenance phase but would have construction and decommissioning phases of up to 3 years. Construction and decommissioning for all action alternatives may occur continuously or with gaps of time in between. If construction occurs with gaps of time in between, it could take longer than 2 to 3 years.
12835-1	Greg Johnson	I have concerns regarding the number of employees that will be coming to our area in RVs, possibly tents, or overloading our hotel accommodations in the surrounding area. I would like to know since all of the RV parks are currently full where are they going to house the employees. Are they going to allow RVs to be parked out on BLM property. Are they going to set up a Wastewater handling facility? Are they going to be creating new RV parks that have not been discussed or permitted. Do any of the wastewater treatment plants in the area have the necessary dump stations and treatment capacity to handle the waste from all of the porta potties that they may try to use on the work sites. Having been in charge of a wastewater treatment plant I know what happens to a wastewater treatment plant if there are too many chemicals and too many solids that come into the plant if the plant can't sustain the high BOD (biochemical oxygen demand) and have enough dissolved oxygen in the water or the capacity to increase the amount of air that needs to go into breaking down the load that could come into the wastewater treatment plant. Also, can enough potable water be provided in the work area to accommodate 700 workers. Is the Bureau of Land Management going to give out permits to allow recreational vehicles to be scattered throughout the property? Who is going to monitor if they are dumping on the ground and hoping that no one will notice? The average Idaho resident uses 168 gallons per day of water. If you multiply that by 700 workers we will need 117,600 gallons per day of water which will end up going mostly to the wastewater treatment plant in the form of urea and BOD. Who will pay if necessary upgrades need to be made to handle the increased Wastewater influent flow to a plant that may be running at capacity already. Each Wastewater Treatment Plant in the United States operates on a National Pollutant Discharge Elimination System (NPDES)permit. The fines if a wastewater treatment plant violates this permit are extremely high. They can range from $1 per gallon to upwards of $10 per gallon for every gallon of water that has not been completely treated and has made contact with any surface outside of the treatment plant including waterways. If the excess load causes this violation who is going to pay the fine?	See responses to comments 11869-9 and 11869-11 (see in Table A-3h, Environmental Justice and Socioeconomics).
12867-2	Steve Lampert	The EIS does not mention the potential environmental damage to maintain dirt access roads with chemicals to mitigate for dust and vegetation control.	See response to comment 3811-4 (in Table A-3v, Soils) for a discussion of impacts from the application of chemical palliatives for fugitive dust control on access roads. Impacts from herbicide application are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-47 and AIB-58. Species-specific impacts

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			from herbicide application are also disclosed in EIS Sections 3.11 (Pollinators and Insects), 3.18.3 (Amphibians), and 3.18.4 (Pygmy Rabbit).
12904-1	Lyle Johnstone	E-3 Preconstruction Activities Preconstruction surveys, such as those outlined in the POD and POD Appendix N: Historic Properties Treatment Plan, Appendix P: Lava Ridge Construction Monitoring Plan, and Appendix Q: Paleontological Resources Treatment Plan, focus on protection of sensitive areas and resources identified for preservation. The limitations of areas to be disturbed would be defined prior to the disturbance to support resource protection and to guide reclamation implementation. Limits would be staked or flagged as necessary. Construction activities would be limited to these areas to prevent adverse effects on sensitive areas. When construction and reclamation are complete, stakes and flags would be removed. Historic Protection of Milner Gooding Canal, is a historic site, this would make many miles of the canal protected, the construction preparation sites, camp sites for the construction phase of the canal. This is not being addressed in the EIS and is completely overlooked by LS Power and BLM. Page: E-3 Preconstruction Activities Reference: Appendix E	See response to comment 12276-1 (see in Table A-3g, Cultural Resources and Native American Concerns).
12925-2	John Haux	However, one issue I have failed to see in the information I have gleaned is who is funding this project. There are no financials on either LS Power or Magic Valley Energy. This is extremely concerning for me. You have a major project on public land which will greatly impact : wildlife, agriculture, aviation, recreation, environment and who knows what else and no information as to where the funding comes from. Further, there is no benefit from the output of the project for Idaho. There may be some local benefit for a short period during construction but there is no promise for even that. I cannot support any public project which does not present full financial disclosure. Can you provide information as the where the funding for this project comes from, government, private party and if so whom in detail?	For local economic benefit information please see the responses to comments 11372-2 and 11789-1 (see in Table A-3h, Environmental Justice and Socioeconomics). The financial and technical capability of MVE is described in Section 1.6 (Financial and Technical Capability of Applicant) in MVE (2023). MVE would be required to purchase a reclamation bond prior to notice to proceed for construction if a ROW grant is issued. Additional details on the methodology for calculating the value of the reclamation bond have been added to the Decommissioning Plan (Appendix L in MVE [2023]); see also applicant-committed measure 164.
12933-1	Tony Martinez	Hi there so just trying to voice my concerns on this lava ridge project. One of them is the affect it will have on our aquifer especially for how much they have blast. Then also with all the oil out consumes and what will happen when they have to change the oil or if it leaks what affects it will have with the environment around it. I know we have windmills already but the size of these ones are are substantially bigger and for that matter what affects it will have around wildlife of the energy it puts out for how much they produce.	See response to comment 11278-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1) for information on the effects blasting will have on the aquifers. For information on oil leaks, also see the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]). For information regarding wildlife, see the response to comment 11598-11 (see in Table A-3aa, Wildlife, including Big Game).
12973-1	Cathy Schiers	What plans are in place for disposal of the equipment when it fails, wears out, or is no longer functioning? Will Idaho land also be required for landfills for the giant turbine parts and equipment?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
12973-2	Cathy Schiers	What are the mitigation plans if there is an oil spill and the oil seeps into the porous lava beds? The aquifer is right below those lava beds, and that is a concern for the health and safety of Idaho residents, plants, and wildlife. It will affect us all.	See the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]).
12976-1	James Komadina	1. Baseline Data Acquisition a. The DEIS presents Meteorology and Climate in Section 3.2.1.1.3. The source documents are found in Appendix 10-12: Midwestern Regional Climate Center.2022 and U.S. Climate Data.2022. BLM PEIS 2005a, Section 2.2.3.2.2 lists General requirements for the Plan of Development ("POD") and specifically in Section 3.1.1 notes that "Site monitoring and testing involve the collection of sufficient amounts of meteorological data to accurately characterize the wind regime. These data are used to support decisions on whether the wind resources at the site are suitable for development and, if so, the appropriate number, type and location of wind turbines." Further, "Meteorological data, such as data on wind speed and direction, wind shear, temperature, and humidity, are typically collected over a period of at least 1 year. However, some developers may choose to collect data for as long as 3 years to account for anticipated annual weather variations." Alternative B will encumber approximately 309 square miles of public lands. Other than the meager Twin Falls data cited, the DEIS contains no site-specific meteorological data which would comply with BLM PEIS 2005a criteria. i. COMMENT - The DEIS does not adequately describe project economic viability based on site wind resources, turbine siting decision making meteorological information, baseline air quality and sufficiency data nor has it included topographic maps indicating potential turbine locations for Alternatives B, C, D and E.	Section 2.2.3.2.2 of BLM (2005a) lists BMPs for POD preparation; there are no BMPs in this section that require proponents to collect or provide detailed information on wind resources or local meteorology in the project area. Section 3.1.1 of BLM (2005a) describes site monitoring and testing activities that are likely to occur as part of a wind energy project, which include the deployment of met towers to collect local meteorological data. This data is used by proponents to inform the design of their projects and there is no requirement that this data be disclosed to the public or evaluated in the EIS. As described under Meteorological Towers in EIS Appendix 11 (Project Elements Common to All Action Alternatives), there are currently eight temporary preconstruction met towers installed across the site to record wind conditions. This section also describes the additional met towers that would be installed during project construction if a ROW grant is issued. Refer to Figures 2.4-1 (Action alternatives comparison) and 2.4-2 (Action alternatives comparison by siting corridor types) in EIS Chapter 2 for maps of the siting corridors under each action alternative. As described in EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction), “The project’s final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. The project’s final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer. This EIS identifies and considers effects to resources present within the siting corridors, allowing for identification of areas with fewer impacts or specific resource trade-offs. This identification of resource constraints within the siting corridors provides flexibility for the project design to adjust through site-specific engineering for the final layout. The action alternatives consider different configurations of the siting corridors to avoid or minimize potential effects.”
12976-2	James Komadina	b. BLM PEIS 2005a, Section 2.2.3.2.2 lists General requirements for the POD and specifically for: i. Storm Water "Operators shall develop a storm water management plan for the site to ensure compliance with applicable regulations and prevent off-site migration of contaminated storm water or increased soil erosion." 1. POD Appendix D describes MVE's Storm Water Plan. 11. Excavation and Blasting Activities "Operators shall avoid creating hydrologic conduits between two aquifers during foundation excavation and other activities." 1. POD Appendix I describes MVE's Blasting Plan. 111. POD Section 5.1.2 describes the impacted lands as rangeland, irrigated cropland, prime farmland and single-family residences. 1v. COMMENT- The absence of baseline meteorological data for the Project area does not allow for an estimation of Probable Maximum Precipitation ("PMP") events to be made and hence, the required storm water structures and procedures are not addressed in POD Appendix D other than stating that the construction contractor will develop these. MVE is the responsible party for informing the BLM and public at large of its plans to control storm water from impacted lands. Idaho assumed primacy ofEPA's Storm Water programs for Construction and Industrial Activities in July 2021, which	See Section 3.2 (Meteorological Towers) of MVE (2023). The BLM is evaluating MVE’s project application. MVE has gathered meteorological information from their eight towers across the project. Also see the response to comment 8421-4 (see in Table A-3m, Human Health and Safety).

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		requires obtaining authorization for discharges prior to construction activities. Yet no description of pollution prevention and Best Management Practices are provided. As such, a review of the adequacy of POD Appendix Dis not possible.	
12976-5	James Komadina	c. Among the numerous problems inherent with renewable energy is that the source of these low intensity power generation methods is not proximal to the end users, thus requiring interconnection to the existing electrical grid or construction of new power lines to the grid. Both of these interconnection methods are required by the proposed DEIS action to achieve an economic outcome. i. In the February 25, 2022 BLM National NEPA Register, it is noted that, "As currently authorized, the Southwest Intertie Project (SWIP), now owned by Great Basin Transmission LLC, is inclusive of two (2) segments of transmission line. The southern segment, SWIP South, runs from Robinson Substation outside of Ely, Nevada to the Harry Allen Substation in Clark County, Nevada. This segment has been constructed and in operation since 2014. The northern segment, SWIP North, has been authorized but has not yet been constructed. SWIP North is a 275-mile, single circuit 500 kilovolt (kV) transmission line and ancillary facilities from the Robinson Substation, located northwest of Ely, Nevada, to the Midpoint Substation, located north of Jerome, Idaho." 11. Great Basin Transmission LLC is owned by LS Power, the owner ofMVE. 111. The DOE Office of Energy Efficiency and Renewable Energy Land-Based Wind Market Report: 2022 Edition Executive Summary notes that "A record-high 247 GW of wind power capacity now exists in transmission interconnection queues, but solar and storage are growing at a much more rapid pace." This observation is further supported by a January 23, 2023 Wall Street Journal article Renewable Energy Draws Billions of Dollars but Installations Don't Get Built by Jennifer Hiller. 1v. BLM PEIS 2005a, Section 6.4.3.2 expresses that "The interconnection Feasibility Study preliminarily evaluates the feasibility of the proposed interconnection to the transmission system. The study should consist of a power flow and short-circuit analysis and provide a list of facilities, a nonbinding good-faith estimate of cost responsibility, and a nonbinding good-faith estimated time to construct." v. Page 56 of the DEIS POD states that "MVE has executed a Large Generator Interconnection Agreement with Idaho Power Company ("IPC"). The next step of the process is for IPC to design, procure, and construct the interconnection facilities necessary to accommodate the Project." v1. COMMENT - The DEIS is silent on the BLM PEIS 2005a requirements. MVE must provide the information set forth in 2c (iv), above, as part of this DEIS process. vu. COMMENT - MVE must provide all related interconnection information, such as transmission alignment(s) and substation location(s), as part ofthis DEIS process.	See Section 1.3.6 (General Facility Description, Design, and Operation) for information on the substations, and Section 6.0 (Maps) for proposed substation locations in MVE (2023).
12976-7	James Komadina	e. The Executive Summary (ES-ix) and POD (page 20) briefly describe a lithium battery facility to be located within the permitted DEIS ROW. MVE's ownership has experience with these types of installations. i. LS Power Energizes Largest Battery Storage Project in the World: the 250 MW Gateway Project in California-LS Power The DEIS is silent on the design, location and safety systems to be associated with this portion of the entire system. ii. Crews battle Tesla battery fire at Moorabool, near Geelong- ABC News 111. COMMENT - Material aspects of the proposed battery plant, including but not limited to the design criteria, mechanism, size, maintenance practices, fire suppression systems and location must be disclosed in this DEIS.	See Section F-6 (Fire Protection and Prevention Plan) in the Health and Safety Plan (Appendix F in MVE [2023]) for information regarding fire suppression. See Section 6.0 (Maps) of MVE (2023), for proposed location information. Design criteria, mechanism, and size would be speculative at this point, but preliminary information can be found in Section 1.3.6 (Substations and Transmission Lines) of MVE (2023).
12976-9	James Komadina	3. Reclamation Plan a. The DEIS presents a Reclamation and Decommissioning Plan in Appendices E and L, respectively. BLM PEIS 2005a, Section 2.2.3.2.5 lists General requirements for the POD. i. Recent NEPA EIS actions have provided for the funding of irrevocable financial assurance instruments for the purpose of decommissioning, reclamation and closure. See 1 FINAL ROSEMONT ROD.PDF (defense.gov) as well as final EIS I Resolution Copper Project and Land Exchange Environmental Impact Statement (resolutionrnineeis.us). 11. For third party investors and the greater public, International Financial Reporting Standards ("IFRS") IFRIC 1 describes the process and necessary financial steps to address reclamation and closure liabilities: https://www.ifrs.org/issued-standards/list-of standards/ifric-1-changes-in-existing-decommissioning restoration-and-similar-liabilities. 111. This DEIS and POD are silent on these matters. As set forth in 2b(i), above, it is critical to calculate Decommissioning and Reclamation costs using 2023 dollar estimates based upon existing technologies along with definition of estimated accuracy levels, subject to future review and approval of the BLM. 1. Such Decommissioning and Reclamation costs must be inflated to the end of the Project life and discounted back to present values to fully describe MVE's anticipated balance sheet liabilities and the public's financial exposure at large through the BLM. a. Mr. Berra is correct, the future is tough to define but current energy policies have driven the cost of fossil fuel energy up markedly with no sign of abatement in the near term The February 4, 2023 Wall Street Joumal lead article, Hiring Shows Surprising Strength by David Hanson, describes a year on year CPI increase well over 6% and private sector wage increases well over 4% for the period 2021 to date. It would appear that a 5% per annum cost inflation factor is reasonable for the life of this POD. b. Appendix 10-33 of Interagency Working Group on Social Cost of Greenhouse Gases (IWG). 2021. Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide. Interim Estimates under Executive Order 13990 provides insightful guidance that supports "lower discount rates when a rule has important intergenerational benefits or costs, agencies may consider conducting additional sensitivity analysis using discount rates below 2.5 percent." 1v. COMMENT- Using the input variables presented in 2d(i) to (iii), a financial model for the 6MW installation indicates an annual EBITDA of $161 million to $289 million for 25% to 45% capacity factors, respectively. Should the IRA taxpayer provided public subsidies be met under the Bonus Labor Credit for union labor utilization, EBITDA increases to $848 million and $1527 million under the capacity factors examined. The resulting payback period is less than 2.5 years for both capacity cases. Without adequate financial closure and reclamation bonds, the operator has no incentive to perform these actions at the end of the approved ROW license. v. COMMENT-To fully apprise BLM and the public ofMVE's Decommissioning and Reclamation costs,	See response to comment 11598-22 (see in Table A-3dd, Plan of Development – EIS Appendix 1).

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		these expenses must be calculated and clearly set forth based upon industry operating factors for all equipment utilized in support of such actions, using current R. S. Means equipment rates, Davis-Bacon labor rates hourly wages and fuel costs, and based upon existing technologies and solid waste disposal methods. These future costs should be inflated using a 5% per annum factor to the end of the ROW license and then discounted back to present using a 2.5% or lower factor. IFRIC 1 guidance should be used. Given the uncertainty of future financial markets, the BLM must require an irrevocable cash bond covering the full liability be provided by MVE prior to commencement of any activities contemplated by the DEIS.	
12978-3	Susan Jesser	10. Wind turbines are not green or clean energy. How many gallons of oil does each turbine take to operate? Are battery operated trucks, cranes, bulldozers, etc. used to build the project?	GHG emissions associated with the project are disclosed in EIS Section 3.4 (Climate and Greenhouse Gases). While approximately 600 liters (158.5 gallons) of oil, lubricants, and other petroleum products are used in each turbine, these fluids typically only require replacement once every 5 to 10 years (see Section 4.1.1 of MVE [2023]). Thus, the amount of petroleum products used during operation would be relatively small in comparison to conventional power generation sources and does not warrant further analysis.
12982-6	Jerry Taylor	There is a similar question regarding acquisition of legal access. Has the proponent acquired legal access through private lands or identified specific parcels of private land, where such access would be pursued? If not, why not? Are they pushing ahead, based on promises of future actions, in order to set the stage for future condemnation actions under the cover of Imminent Domain? I suspect so. If these actions (i.e. significant impacts on the human environment, of which farm and ranch families are certainly a part) are expected, they should be disclosed upfront and analyzed in full! Otherwise, BLM will be guilty of "piece meal planning". I understand that MVE has approached land owners about access and has been rebuffed. The DEIS should be suspended until such time as MVE secures legal access required to construct and operate, hopefully on a willing seller/ willing buyer basis.	See the Road Design, Traffic and Transportation Plan (Appendix J in MVE [2023]). Most of the access will be done during the construction phase, which can be largely done from U.S. 93 and ID 24.
12982-12	Jerry Taylor	The "Blasting Plan", with analysis and input from a Certified Blasting Engineer must be done before the DEIS proceeds. A Certified Blasting Engineer is needed upfront to help inform the impacts that can be expected both above and below ground. The "Blasting Plan" should be fleshed out upfront and included in the DEIS to help inform specific resource impacts and cumulative impacts expected. If not, BLM will be guilty of piece meal planning and the required disclosure of potentially significant impacts and cumulative impacts will not be possible.	See the Blasting Plan Methodology (Appendix I in MVE [2023]). The plan is to be prepared by a construction contractor and will be reviewed by applicable parties prior to implementation.
12990-1	Jim Meeks	In the Lava Ridge wind draft environmental impact statement: Volume 1, Appendix 3.2 completely omits any data about the turbine wings being treated with toxic PFAS. Table ES-2 "air quality" has the same omission. How can we address the detrimental impacts to our air, ground and water quality when the draft omits mention of PFAS? We say no to any PFAS treated turbine blades.	See response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
13000-13	Nathan Small	Obsolete forms of energy generation cannot be considered as end-state structures, so the Tribes would also request the NEPA document completely evaluate the closure plan for this proposed facility and the rehabilitation of all disturbed areas at the completion of this project at the end of the lease term.	See the Decommissioning Plan (Appendix L in MVE [2023]) and the Reclamation Plan (Appendix E in MVE [2023]).
13003-5	Lynden Osborne	Disturbed soil, once exposed to wind and sun, is dryer than undisturbed soil, ultimately affecting revegetation efforts. The Lava Ridge Project developers, according to the written plan, expect to have annual rainfall of twelve inches to aid vegetative restoration. That number might be overly optimistic. From 2006 to 2020, I recorded an average of 7.6 inches of annual rainfll with one year yielding only 2.7 inches. Granted, while I am located twenty miles from the project area, this 4.4- inch difference seems rather substantial. As stated previously, dry conditions not only lead to more dust, but dry conditions generally inhibit plant propagation. According to the DEIS, the windmills will cause the air near them to be warmer and dryer. Surely, this would also make the soil dose to them warmer and dryer making it very difficult to reestablish desirable vegetation.	See response to comment 12976-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1). As stated in MVE's applicant-committed measures 163 and 164 in EIS Appendix 4 (Mitigation), MVE would be held to reclamation success criteria. Reclamation areas would be monitored until the success criteria is met or up to 5 years following the initial or additional reclamation activities. Monitoring and additional measures may extend beyond 5 years if success criteria are not met. Reclamation success is defined by the re-establishment of vegetation and topography compared to conditions in the surrounding area at the time of reclamation. MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria.
13004-1	Jim Meeks	In the Lava Ridge wind project draft environmental impact statement: Volume 2a, appendix I1 through I6 does not address the specific depth of blasting or excavation. We cannot analyze the impact of either because the draft statement data is incomplete.	See the Blasting Plan Methodology (Appendix I in MVE [2023]). The blasting contractor will be responsible for preparing and implementing the Blasting Plan and must comply with all applicable federal, state, and local laws and regulations. No blasting operations will be undertaken until appropriate permits and approvals have been obtained. The depth of the blasts will vary by site, and blasting will only be used in areas where traditional excavation and earth moving equipment are unable to accomplish the excavation.
13008-2	Scott Hauser	In section 1.3.16, the DEIS states, "Project fences will only be installed as necessary. A chain-link fence will be installed around the Project O&M facilities and substations for safety. In instances where permanent fences are meant to be a barrier only to livestock or vehicles, wildlife friendly fencing will be used. In other instances security fencing will be used as necessary to protect MVE property (e.g., O&M buildings, substations) or prevent injury to non-MVE personnel, livestock, and wildlife." It is unclear if all fencing will be chain-link or if other types of fencing will be used. It is also unclear as to what "wildlife friendly fencing" refers to. Does this include flagging/installing strike guards for sage-grouse and clean strands of wire for Pronghorn? It would be beneficial if the DEIS expanded on what type of fencing would be permanently (life of the project) installed and what type of measures will be included for wildlife friendly fencing.	See response to comment 13006-13 (see in Table A-3aa, Wildlife, including Big Game) and the Flagging, Fencing, and Signage Plan (Appendix K in MVE [2023]). A combination of rope, plastic, and safety fencing will be used in addition to flagging and signage.
13008-3	Scott Hauser	Roads and traffic will have an impact in the short and long term. USRT has a few questions regarding these potential impacts: 1) How many miles of road will be established and maintained throughout the life of the	Miles of new and improved access roads by type are provided for each action alternative in Table 2.4-2. As described in EIS Appendix 11 (Project Elements Common to All Action Alternatives), project access roads would generally be open to the public, although access may be restricted during certain construction and O&M activities for public safety. The BLM would evaluate project access roads for decommissioning at the end of the

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		project? 2) Are these roads open to the public? If they are open to the public, is there consideration of whether these roads will last beyond the life of the project?	project, the analysis in EIS Chapter 3 (Affected Environment and Impacts) assumes that all project access roads would be permanently retained.
13012-7	Heather Saunders	The bigger concerns in the wind turbine industry are fire and lightning (which usually leads to fire). According to an article published by Fire Safety Science, a peer-reviewed journal of the International Association of Fire Safety Science, the tendency of wind turbines to catch fire is one of the major challenges facing the industry. What plan is in place to prevent a wind turbine fire from escalating into a major wildfire, particularly considering the remote location? Will the company responsible for any catastrophes have an escrow account established to pay damages to farmers, ranchers and homeowners who may end up losing herds, fields and homes to an uncontrolled wildfire started by one of their turbines? Are they prepared to cover the costs of fighting such a fire? I spent 16 years working in disaster services for a local county and I know exactly how much it costs to fight a wildfire. Taxpayers should not be held accountable for financing the cost of fighting a major wildfire started by a private company in the pursuit of profit. According to that same article, although progress has been made since 2002, fires are still a major problem for the industry resulting in 30-40% of the losses suffered. How much wildlife and how many people are being endangered with this project that will not benefit our state in a way we consider to be meaningful?	A Fire Prevention and Protection Plan is provided as Section F.6 (Fire Prevention and Protection Plan) in the Health and Safety Plan (Appendix F in MVE [2023]). See response to comment 11360-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1) for a discussion of fire suppression responsibilities in the project area. Impacts to wildfire ignition, spread, response, and suppression are disclosed in EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression).
13012-9	Heather Saunders	As you know, we don't have a lot of tall anything in that area to attract lightning away from wind turbines, which means they are going to need a top notch grounding system. The problem I expect them to encounter is that the grounding rod needs to have better contact with moisture in the ground than the tower footings to be effective (Solar Age Magazine). I farm in southern Idaho and I can assure you that moisture in the soil is something we lack. We have had years when the soil was so dry it actually became hydrophobic; we had to till thewater into the soil to get it to stay put. When the soil gets that dry it also picks up a lot of static electricity. Static electricity can have serious detrimental effects on wind turbines, causing problems throughout every system. The drier the air, the higher the probability that static electricity will cause problems, and Idaho has very dry air indeed. Experts say that relative humidity of 40% is required to control static in the air; southern Idaho's relative humidity in the summer months is well below that number (Climatology of the Idaho National Laboratory 4th Edition, June 2018), indicating a need for additional and robust static protection in any such installation (M.S. Davis and M.R. Madani, "Investigation into the Effects of Static Electricity on Wind Turbine Systems," 2018, pp.1-7, doi: l.1109/IRSEC.2018.8703008). According to Davis and Madani, an unnamed German study stated that lightning strikes account for 80% of wind turbine insurance claims. One German installation on Helgeland Island was shut down after only 3 years because the insurance company refused to cover any further losses due to lightning (totaling over half a million dollars at that point). The same thing could easily happen here in Idaho. Is this company prepared to decommission this installation and pay whatever amount is necessary to return it to its pristine state if it turns out to be too costly to maintain?	As described in Appendix C (Alternatives Considered by MVE) in MVE (2023), MVE considered multiple sites for the project and selected this location with the help of the latest computer modeling software and assistance from leading consultants in meteorology and wind development. Emphasis was also placed on avoiding impacts to important and priority sage-grouse habitat. MVE would be responsible for repairing or replacing any turbines damaged by lightning or static electricity. As described in the Decommissioning Plan (Appendix L in MVE [2023]), MVE would be required to purchase a reclamation bond prior to notice to proceed for construction, if a ROW grant is issued. Additional details on the methodology for calculating the value of the bond have been added to the Decommissioning Plan; see also applicant-committed measure 164 in EIS Appendix 4 (Mitigation).
13012-10	Heather Saunders	Another common problem with wind turbines is leading edge erosion, which begins the moment a wind turbine goes online. Here we have wind driven dust that includes erosive particles of both basalt and rhyolite. Basalt is a relatively hard mineral with a Mohs of 6; rhyolite contains a quartz base and can be even harder (quartz is 8 on the Mohs scale). Both of these substances are considerably harder than the plastic/fiberglass covering on the blades of wind turbines, and wind driven dust composed of these elements will cause the breakdown of the leading edge. Dust that manages to penetrate the windmill will cause even greater damage; nothing can destroy mechanical workings of all types like volcanic material. Metal is no defense.	See response to comment 11686-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
13012-11	Heather Saunders	Warming is also a problem with wind turbines. A 2018 study conducted by scientists from Harvard that was published in the academic journal Joule found that wind turbines cause significant local increases in surface temperatures in the areas where they are located. The typical Idaho summer is already set on broil; how much higher did they wish it to go? Further, the warming impact of the turbines was higher than the expected impact on warming from the turbines. This study was conducted in Minnesota where they don't have ground composed largely of basalt that also absorbs heat and raises temperatures. Minnesota is also much closer to sea level than Idaho is, a factor can weigh heavily of the efficiency of wind turbines. Higher temperatures make both wind turbines and solar panels less efficient. Solar panels lose 10-25% of their efficiency in high temperatures; for wind turbines the loss of efficiency is dependent upon the air density. However, at temperatures over 113 degrees wind turbines start to shut down, according to an article in Fortune magazine. There tends to be more wind in areas of higher temperatures, but the weatherization of wind turbines has concentrated more on preparing them for cold environments than hot environments. We don't get many days that are that hot, but we do get them...usually multiples in a row. Here's the part that I don't understand, and maybe you can get these guys to explain it to you. Why are so many companies determined to build wind farms in a state that is so unsuited to it? Yes, Idaho has a fantastic wind map but that is only one quarter of the equation. The efficiency of wind turbines is based upon temperature, the air density (which is also based on temperature), the rotor diameter, and the wind speed. Wind turbines are designed for optimal operation at an air density of 1.225 kg/m"3 and at temperatures well below 104 degrees Fahrenheit. The 104 degree F figure is the temperature at which wind turbines start to overheat. The average air density in southern Idaho is 1.06 kg/m"3 and we have multiple days above 104 degrees (Climatology of the Idaho National Laboratory 4th Edition, June 2018). In 2022 Boise had 25 days of temperatures over 100 degrees, and has been consistently above ten days of 100 degree temperatures since 2006. Things don't get any cooler as you go east. It seems that the further you get from the rivers, the hotter the temperature gets and the longer the high temperatures last. Southern Idaho is obviously not	See Section 1.2 (Purpose and Need for the Project) of MVE (2023). The project location was selected based on the quality of the wind resource in the area, the power markets accessible by existing and planned transmission lines in the area, the availability of suitable land, and the absence of land use constraints.

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		as suitable a place for wind turbines as other areas (wind speeds not withstanding), with temperature extremes and air densities that will guarantee a hit to the efficiency of this installation.	
13012-13	Heather Saunders	At the end of the turbines lifetime we have waste. Non-recyclable turbine blades are clogging our landfills. Experts in the field expect the waste from wind turbines to increase to hundreds of thousands of metric tons before 2030. Are you going to ensure that all that waste is shipped to the people who are actually benefitting from the electricity this project will produce?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
13024-4	Keith Stone	There are other concerns, such as disposal of the massive turbine blades that cannot be recycled or composted. Our pristine high desert areas should be protected and not subjected to the blasting, construction equipment, foundations, maintenance crews, and waste disposal that will certainly be required with the proposed project. I	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
1334-1	Ranger Cook	If this boondoggle is allowed to proceed, please make sure money is put in escrow for end of life of the windmillsaEUR|..before start. The citizens of Idaho should not be left to clean up a skeletal mess	See response to comment 12925-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
1953-2	Allan Lloyd	In 15 to 20 years these huge machines will be piles of rusting metal with thousands of pounds of concrete under the ground. What will you do with them then?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
1984-1	Sue Williams	There is no plan in the DEIS that shows what MVE's plan is for fire suppression on a wind turbine and on the wildland that surrounds the structure. While MVE presents a periodic maintenance plan for the turbines, there is no acknowledgement of the difficulty of suppressing a wind turbine fire from either an internal fault in the nacelle or from a lightning strike, igniting the 600-900 liters of oil. Records show that most wind turbines that catch fire cannot be suppressed directly due to the excessive height of the nacelle. The standard practice is to allow the fire to burn itself out destroying the nacelle and the structure. This is unacceptable due to the danger of a fire spreading to the surrounding wildland, destroying wildlife habitat, and endangering farms and ranches in the immediate area. Further, there is no plan in the DEIS showing what MVE's plan is for suppressing a wildland fire in the project area. Not addressing the potential effects on the surrounding communities in terms of the cost to fight such a wildland fire, the lack of sufficient personnel and equipment, and the inability of possible slurry bombers to access the site, make this a serious deficiency in the DEIS.	We have included additional discussion in the impacts analysis in EIS Section 3.7 (Fire and Fuels Management) concerning fire risk associated with wind turbines. See also MVE's Fire Protection and Prevention Plan—located in Section F-6 of the Health and Safety Plan (Appendix F in MVE [2023]).
2096-1	Nancy Anna Caldwell	I feel energy such as windmills is a creative idea. And we need sustainable energy. I saw the destruction in TX after their huge freeze. What makes your system more sustainable in freezing temperatures ? Not to mention the birds that fly into the windmills? Are your windmills less susceptible to freezing weather and how do you plan on disposing of windmills that get damaged?	Turbines are equipped with sophisticated monitoring equipment that provide the operator with up-to-date information regarding environmental conditions that inform turbine operations. This monitoring equipment allows the operator to shut down turbines in the event that ambient temperatures exceed the turbine operating envelope. Turbines installed in Texas do not require, and are typically not equipped with, cold weather packages (CWPs) that are offered by the major wind turbine manufacturers. These CWPs can include, but are not limited to heating systems within the gearbox, generator and electrical cabinets to keep components and fluids warm, as well as specialty lubricants designed to allow operations in cold weather climates. Turbines without CWPs can operate down to an ambient temperature of around -15℃ (5℉). Turbines with CWPs installed can operate down to an ambient temperature of around -30℃ (-22℉). The turbines installed at Lava Ridge would be equipped with CWPs. Bird strikes are one of several factors that can cause wear and tear on turbine blades; turbine blades would be replaced as needed during operations and maintenance, as described under Project Operation and Maintenance in EIS Appendix 11 (Project Elements Common to All Action Alternatives) and Section 4.0 (Operations and Maintenance) in MVE (2023). Disposal and recycling of turbine blades and other project components is described in the Decommissioning Plan (Appendix L in MVE [2023]).
2208-1	Katie Powell	Site preparation with vegetation removal and "treatment" with fences what kind of treatment ?	See response to comment 11487-2 (see in Table A-3x, Vegetation).
23-1	John & Mary Mills	I have seen many wind projects all over the Western USA and none have the size of the towers to be used at Lava Ridge. Why? Why not shorter say 200' instead of 750'.	See response to comment 1042-2 (see in Table A-3ee, Alternatives). Larger rotor diameters allow wind turbines to sweep more area, capture more wind, and produce more electricity.
2314-6	Mike Tylka	Wind generators have limited life span and no effective method to recycle their components. How much initial energy is invested in their manufacture?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding turbine disposal and comment 11344-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1) regarding lifecycle emissions associated with wind turbines.
2385-1	Bob Stokes	Who would benefit from this massive project? Idaho residents? Or will the electricity be delivered to California?	As described in Section 1.2 (Purpose and Need for the Project) of MVE (2023), the project would interconnect at the existing Midpoint Substation or SWIP-North line; existing and planned transmission pathways will allow power from the project to be delivered to load serving entities in several western U.S. states, including Idaho and California. Economic impacts of the project are described in EIS Section 3.6 (Environmental Justice and Socioeconomics).
2459-1	John	What is your plan to dispose of the turbine blades after being replaced? More forever chemicals???	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
2842-1	Matt Delaney	There was not enough information to me that showed how efficiently the impacts would be. 200 to 400 turbines, 2-5 substitution whether or not the interconnect would be midarny sub or SWIFT? One battery storage does not sound reliable for 2-5 collector subs. There does not seem to be the design of the project in place or set in stone to make an accurate assumption of the environmental impacts. For the long term. Nothing was evident to who would be held accountable. These projects are bought & sold several times and the energy is not efficient and likely to be used locally.	Refer to MVE (2023) for a detailed description of the project. As described in the Decommissioning Plan (Appendix L in MVE [2023]), MVE would be required to purchase a reclamation prior to notice to proceed for construction, if a ROW grant is issued. Additional details on the methodology for calculating the value of the reclamation bond have been added to the Decommissioning Plan; see also applicant-committed measure 164.

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2863-2	Brock Dille	The EIS doesn't mention support and rather Idaho Power can transmit the power. There is no guarantee that when each turbine is all the end of life, restoration will occur. How do ensure restoration will occur as defined in the EIS?	The power generated would interconnect with the existing Idaho Power Midpoint substation or a new interconnection substation located along the SWIP-North alignment, as mentioned in Section 1.1 (Introduction) of MVE (2023). See the Decommissioning Plan (Appendix L in MVE [2023]) and the Reclamation Plan (Appendix E in MVE [2023]). The terms and conditions within in an authorization, if approved, would require a reclamation bond prior to an NTP with construction is issued.
2878-2	Scott Prow	Nowhere in the EIS does it speak to the size of a 3-MW turbine. In light of this oversight I cannot know for sure the actual height of a shorter 3-MW turbine and this inconsistency (between the 2-MW and 3-MW turbines) gives me pause and I question what else in this EIS may be wanting or disingenuous. Because of this I cannot support this project and would propose Alternative "A" -No Action. Respectfully,	See Section 1.3.4 (Number and Size of Wind Turbines) of MVE (2023). Several factors influence the size and number of wind turbines with a minimum height of 390 feet and a maximum of 740 feet.
2895-1	Sue Williams	While MVE presents a plan for periodic maintenance for the turbines, there is no acknowledgement of fire occurrences and their plan for suppression of a wind turbine or a resulting wildland fire. Public records indicate that it is standard wind farm practice to allow the nacelle to bum out completely, exposing the ground to contamination from fluids and burning plastic components from the collapsing structure. If the turbine's blades are moving while on fire, there is significant danger of ignition of the wildland surrounding the structure, destroying wildlife habitat and endangering farms and ranches in the immediate area.	MVE's Fire Protection and Prevention Plan is located in Section F-6 of the Health and Safety Plan (Appendix F in MVE [2023]). EIS Section 3.7 (Fire and Fuels Management) describes the potential for project-related fire ignition, spread, response, and suppression.
2915-4	Roger Twitchell	Another issue, one which is not addressed in the DEIS is security. The proposed wind turbines, under any alternative would be spread out over a huge area. As recently demonstrated, electrical substations in the US are vulnerable to vandalism/sabotage. The wind turbines would provide a target for similar assault and would be harder to protect than a substation. Would MVE provide area wide security for the wind turbines? Would the public lands on which the wind turbines are proposed to be located remain open or be closed to the general public?	See response to comment 12934-5 (see in Table A-3n, Issues Analyzed in Brief – EIS Appendix 3).
2915-5	Roger Twitchell	Also, for MVE to respond, where will the components for the wind turbines be sourced? Where are the environmental impacts analyzed?	See EIS Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) and EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions). It would be speculative to guess where the wind turbines will be sourced from at this point in time.
2928-1	Julie Stadtherr	I do not think that this issue has been addressed sufficiently. Exactly how do you mitigate for blasting damage far below the surface of the ground? Are there any studies that show conclusively that this blasting, other construction activity and building gigantic, ground vibrating structures on top of a lava aquifer causes no damage? Will MVE be held legally liable and required to replace any wells in the region, meaning ANY AREA that derives its water from the Snake River Plain Aquifer, should water volume or water quality be affected?	See response to comment 11278-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1) and the Blasting Plan Methodology (Appendix I in MVE [2023]).
2933-1	Alwena Sauage	1. Will the wind turbines be replaced when they were out after 20-30 years? or are they just going to be thrown out? If they cannot be replaced - then wind turbines are an unstable source of power. Pt 2 of 2 2. What will be the harmful effect of magnesium chloride after he wind turbines are gone? (like 30 years) 3. Does LS power own the turbines that are already in Idaho? How many are in production? Who has contracted with LS power for existing power? This should be public knowledge? Where can I find this information?	LS Power does not currently operate wind turbines in Idaho. Contracting for the power that would be generated from the project has not yet been established. See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding turbine disposal. See response to comment 3811-4 (see in Table A-3v, Soils) regarding impacts from the use of magnesium chloride as a dust palliative.
2939-5	George Solverson	last, the Qecommission Plan needs to address the risks in dealing with the substantial tower, blade, and battery waste stream. Where will the landfill be located to bury the unrecyclable blades and will the dump site include more solid waste from other planned wind facilities?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
3032-1	Robert Johnson	If that is not enough I would ask that you get more data on the long term effects of the loss of vegetation,birds,big game ,and small game ,what kind of help of recovery ,if at all, at the end of the projects life span , I also did not see where there was an actual end date of the program ,just a time frame,for the life span of the windmills ,or is the project permanent and who would be responsible for tearing out all of the roads and fences that will be built, and where will all of these windmills be destroyed or buried.There are many un answered questions just alot of information on how much damage that will be caused.	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste), 11554-15 (see in Table A-3aa, Wildlife, including Big Game), and 6075-4 (see in Table A-3aa, Wildlife, including Big Game). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
3044-1	Name Not Provided	The article stated it will supply 350,000 homes with electricity. So, does one windmill power 1,000 plus homes with power for 24 hours per day? That seems to me an exaggeration. I would assume you have verified evidence to exactly how much power this Power Plant will supply. I did not see verified numbers on your website.	Table 2.4-1 in EIS Section 2.4 (Alternative B [Proposed Action]) lists the estimated annual power generation of the project under each action alternative based on a net capacity factor of 35-45%. Annual net capacity factor is the ratio of the net electricity generated in 1 year to the energy that could have been generated at continuous full-power operation in 1 year. Annual power generation is presented in TWh; neither the EIS nor MVE (2023) make any statements as to the number of homes that would be powered by the project. Estimates for the number of homes that can be powered per MW of generation capacity vary widely, but even at the lower end (100 homes per MW) a single 3-MW turbine could power 300 homes and a single 6-MW turbine could power 600 homes. Thus, at maximum capacity, the project would provide enough power for more than 200,000 homes. When the full range of estimates is considered, the number of homes powered at maximum capacity could be close to 2,000,000.

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3055-2	Karen Matsumoto	Monitoring of construction and operation of the wind farm was not clearly outlined or evaluated in the DEIS document. Who is accountable?	See the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]). The plan outlines the roles and responsibilities of the compliance team in executing the plan and describes their reporting relationships.
3072-2	Matt Delaney	The EIS can not be accurately completed when the design of the project is still in question. There are A through E options? MVE could answer and do not have a plan as to how the foundations of the turbines are going to be built? How can a study be accurate when the details for the project are not there.	The BLM is evaluating the potential impacts from Alternatives A through E via this EIS NEPA process. If the BLM selects an action alternative, MVE would conduct site-specific geotechnical studies (MVE 2023) and summarized details in EIS Appendix 11 (Project Elements Common to All Action Alternatives). See also EIS Section 2.3.1 (Project Location, Siting, Landownership, and Jurisdiction): "Although the exact location of infrastructure and activities within the siting corridors is unknown at this time, evaluating the entirety of the siting corridors for potential impacts provides flexibility to site the project components where necessary (from both resources and engineering perspectives) within the siting corridors. The project's final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. The project's final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer. This EIS identifies and considers effects to resources present within the siting corridors, allowing for identification of areas with fewer impacts or specific resource trade-offs. This identification of resource constraints within the siting corridors provides flexibility for the project design to adjust through site-specific engineering for the final layout. The action alternatives consider different configurations of the siting corridors to avoid or minimize potential effects. These configurations are described by alternative below."
3073-2	Becky Ipsen	4) The loss of use of the land to our cattlemen and recreationists. 5) What do we do with the waste? Windmill after windmill are taking up large landfills in Wyoming at this time. Why can't we recycle these? If the government was serious about saving our resources then why are these large projects not made to be recycled and low impact?	See response to comment 13006-24 (see in Table A-3u, Recreation) regarding recreationalists, along with the Decommissioning Plan (Appendix L in MVE [2023]) and the Grazing Coordination Plan (Appendix S in MVE [2023]). MVE will prioritize the re-use, recycling, or scrap value of the decommissioned project components over direct disposal in approved landfill facilities. New industrial technologies that recycle turbine blades are currently gaining traction in the marketplace and are expected to increase in utilization over the life span of the project.
3084-3	Julee Austin	but what has not been addressed is what consequences construction can have on groundwater supplies and what remedies are available.	See response to comment 8421-4 (see in Table A-3m, Human Health and Safety) and the Stormwater Pollution Prevention Plan (Appendix D in MVE [2023])
3092-1	Jeff Juker	Will the land be put back as it was found at end of life of the project? Who will guarantee this if so and provide funding to do so?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11411-7 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
3115-1	Virginia White	I am against wind farms until the industry recycles their structures. The mining industry is required to reclaim where they mine, leaving the site beautiful and usable. I am very concerned about the environmental impact of the turbine blades when they fail at the end of productivity. The first generation of turbine blades are now failing and cannot be recycled. I have heard some are being buried in farm fields. Why would Idaho want to build wind farms with no plans to recycle these huge turbines? Building wind farms without plans to recycle these turbine blades is a terrible way of polluting our beautiful land in Idaho. It is irresponsible to continue building wind farms until this problem is solved.	MVE will prioritize the re-use, recycling, or scrap value of decommissioned Project components over direct disposal in approved landfill facilities as stated in the Decommissioning Plan (Appendix L in MVE [2023]).
3140-1	Susan Page	Where is the plan showing how the blades will be de-iced? The Idaho weather will cause freezing effects to the blades which will require chemicals sprayed on them. How? One new method is for drones to spray chemicals into the air and onto the blades. How will that chemical effect the surrounding area? The wildlife but more importantly the recreational activities by hunters of ducks and geese that fly through the area as well as the sound of the drones scaring the wildlife out of an area used for lots of winter activities.	AIB-14 was added to EIS Appendix 3 (Issues Analyzed in Brief): Would ice throw or ice shed from turbine blades pose risk of injury to workers and the public? Application of deicers for turbine blades or the use of drones are not proposed under any action alternative. Site-specific meteorological data collected by MVE indicates a relatively low potential for icing.
3150-4	Cameron Stauffer	Continuing at the BLM open house, the public was made aware that one of, if not the biggest, driving factor for "green energy" development, is because of the current political administration. This project is slated for two years of construction, 32 years of operation, and up to 50 years for full reclamation of native habitat. In the best-case scenario, this is an 84-year project being determined by a four-year administration. When asked at the open house; what would happen if MVE forfeits their bonds for the project? There was no answer, and it undoubtedly would leave the landscape worse off.	See responses to comments 11782-6 (see in Table A-3bb, Applicant's Interests and Objectives) and 12059-2 (see in Table A-3bb, Applicant's Interests and Objectives).
3163-4	Rick Aitchison	If the Project goes Forward we should Take Small Steps 10 Windmills with follow up studies and not Add more Windmills for at least 1 year from the First 10 Windmills are Implemented.	The BLM is responding to MVE's application for an up to 400 turbine wind generation facility. Part of the project proposal is construction phasing, see Section 2.3 of MVE (2023). The application did not request phasing installation of only 10 turbines per year. This construction approach would render the project uneconomical.
3163-5	Rick Aitchison	Mandate only American Manufactured Parts are Used.	Refer to EIS Section 1.3 (Decision to be Made) for a description of the decisions the BLM is evaluating in this EIS. Decisions regarding materials sources and manufacturing are outside the scope of this EIS.
3163-8	Rick Aitchison	Mandate Preventive Maintenance Procedures are Followed.	Operational staff will perform routine maintenance, long-term maintenance, and emergency work as needed. Routine maintenance typically occurs every 6 months to a year, as described in the Operations and Maintenance section of MVE (2023).
3163-9	Rick Aitchison	Use Local Builders or Construction Companies to Build Roads.	See response to comment 11869-9 (see in Table A-3h, Environmental Justice and Socioeconomics).
3204-1	Carol Pelazini	I understand that wind turbines are being proposed for Idaho. That will be a tremendous and horrendous project. It will destroy the grandeur and majesty of the Idaho landscape. I moved to Idaho 11 years ago from Redlands, CA. Between Redlands (city east of San Bernardino) and Palm Springs there are two windmill farms. I read in	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). MVE will prioritize re-use, recycling, or scrap value of decommissioned project components over direct disposal in approved landfills, as covered in the Decommissioning Plan (Appendix L in MVE [2023]). For information related to effects

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		our local paper before moving that they were known as Condor Cuisinarts due to the large number of dead birds underneath. Even though the wind blows there almost constantly some of the turbines are still making me wonder about the maintenance and therefore the efficiency. Where do the worn out parts go? To the landfills? I'm well aware of the need for renewable energy but windmills are not the answer. They pose a great threat to our environment.	on avian populations please see comments 12469-10 (see in Table A-3d, Eagles) and 13012-8 (see in Table A-3, Birds). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
3250-2	Joni Nakayama Kimoto	I am also greatly concerned over the safety and the possible risks of equipment failure once the turbines are operating. There is an article in the Oregonian dated August 24, 2022, where Biglow Canyon's wind farm in the Columbia River Gorge, experienced disastrous turbine failure. The article cited that broken bolts and nuts detached a wind turbine blade. This 8 ton blade separated from the turbine and soared the full length of a football field, plowing into a nearby farmer's field 4 feet deep. The blade is like shrapnel and spiked deep into the soil. The nuts, bolts and hatch doors fell from a height of 265 feet, and reached 90 mph, maybe a hazard to anybody nearby. How would that compare to the height of the Lava Ridge turbines at 740 feet high? How many tons will one Lava Ridge blade be and how far can it fly? Article also stated that oil leaks and lubricants from Biglow Canyon's wind turbines are environmental and fire hazards, if not properly maintained as they age. Would Lava Ridge guarantee preventative maintenance so as not to impact the safety of nearby Minidoka's site?	See Section 4.0 (Operations and Maintenance) of MVE (2023) for scheduled wind turbine maintenance plans. Also see the Health and Safety Plan (Appendix F in MVE [2023]).
3302-8	Susan Canham	What is the energy source of operating the battery energy storage system and its energy cost?	The battery storage system would be powered by the wind turbines and is discussed in Section 1.3.6 of MVE (2023).
3477-2	Rebecca Loomis	Are batteries part of this project? There are no batteries to store the power generated. No battery system could store the amount of energy needed to power cities.	Batteries will be a part of the project and are covered in Section 1.3.6 of MVE (2023).
3500-1	Alta Toler	I would ask that you look into vertical wind machines. They do less damage and provide as much or more energy.	See response to comment 1043-1 (see in Table A-3ee, Alternatives).
3508-1	Russell LeJeune	I suggest your organization assure the landowners that they will not be responsible for maintaining and removing the turbines should a change in operation or redirection occur.	Operational staff will perform maintenance as mentioned in Section 4.0 (Operations and Maintenance) of MVE (2023).
4542-1	Judy Stockham	According to the EIS, even with mitigation and strict adherence to the plan in decommissioning, it will take 50 years for the projects footprint to be no longer visible. This is a fragile ecosystem that will be virtually damaged/changed for three-quarters of a century. That will be past the lifetime of myself, my children, and my grandchildren. The one thing that will outlive the project and remediation are the turbine blades which will be here for the life of the earth. A fact that will over whelm and local landfill and what about the long-term consequences of burying these blades. The taller higher-capacity turbines produce even more waste and they will need to be cut up onsite before removing them. What harmful effect will be produced when cutting/grinding these fiberglass blades into a more manageable size? This could pose a risk to all inhabited areas that are in the winds path as they bring these harmful particles out from the site. Wind turbine blades pose the greatest challenge to end-of-use considerations.	See the Decommissioning Plan (Appendix L in MVE [2023]), which states that MVE anticipates that the decommissioning activities for the project can be completed over a 2-year period. It will also be conducted in strict accordance with the Health and Safety Plan (Appendix F in MVE [2023]).
4542-2	Judy Stockham	The taller turbines (both proposal heights) should be rejected as the studies on these high capacity towers is still incomplete. Bloomberg (1-23-2023) reported on these taller towers buckling and falling on top of themselves. According to Bloomberg, Siemens Energy revised down their earnings outlook for 2023 citing higher than expected costs caused by flaws. “There’s a hesitancy among insurers and lenders about these big models that haven’t been tested yet. The technology alarm bells are ringing”. Therefore, with an abundance of caution no approvals should be issued for the taller towers and the application should be re-submitted with average height not to exceed that of towers already built within the Magic Valley. Most wind farms are maxed at 229 ft towers with 164 ft long blades. EIS noted turbine blade motion will affect weather at the surface: warmer at night and cooler during the day. According to a study by the University of Delaware wind projects can have unintended effects on local weather in the form of minimal though statistically significant impact when it comes to wind speed and reduced precipitation at nearby locations. This would affect an already arid desert land and the re-planting of grasses may not be viable due to a decrease in moisture. Journal of Physics (2022) states “as wind turbines are getting bigger in size, designs are becoming more light weight and consequently the ratio of the aerodynamic over the inertial loading increases”. “This makes the turbines more prone to Stallin Vortex Induced Vibrations. This may appear during locked or in idling mode”. Is the turbine safe during these vibrations and to what extent will the increased vibrations and noise affect any wildlife, humans, or occupied areas. Again it seems these very tall turbines have not sufficiently been studied for their influence on aerodynamic behavior and its influence on the physical environment.	The size of the turbines proposed for the project are within the range of turbines installed at existing U.S. wind energy facilities (see, for example, the discussion in EIS Section 3.3 [Avian and Bat Species]). Impacts related to changes in air flow and surface temperatures from wind turbine operations are disclosed in Table App3-1 in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-44. See response to comment 11336-2 (see in Table A-3aa, Wildlife, including Big Game) for a discussion of impacts to wildlife from turbine vibrations and noise.
4770-3	Brinya Olmstead	I have read that LS Power proposed to complete this project in two years. I do not believe that construction timeline to be probable or possible. I worked for Western Construction for 3 years on road projects throughout southern Idaho and have seen first hand how many things can go wrong, especially when moving large amounts of earth in a previously undisturbed area. My family and I drove out to the south side of the proposed project last week and the desert roads were muddy and virtually unpassable unless you wanted to risk getting stuck every couple miles and tearing up the surrounding grassland by driving off road. We turned around, but what is LS Power going to do in these conditions? Won't there be a significant amount of time each winter that they are unable to work due to unpassable roads? I read that they are going to build 600 miles of road to accomplish this project. The amount of gravel and maintenance that will be required to keep these roads passable to heavy equipment during the winter months seems to me that it will be Very disruptive to the native wild life and beauty	See responses to comments 11204-12 (see in Table A-3dd, Plan of Development – EIS Appendix 1) and 11535-142 (see in Table A-3w Transportation).

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		of our desert. This will not end with the end of construction as I can only assume that these gigantic windmills will need constant maintenance that can only be performed with large equipment.	
5332-1	Marilyn Broek	A 2 year construction project. Ridiculous to even say such a thing. Of course there is small print stating that the construction 2 years could be split into 2 or more phases. That means there are no limits on the construction time. And it is stated that construction will avoid eagle nesting times(Jan thru end of August). As well as other time restricted construction windows. So many Applicant Committed Measures that need to be tabulated. Who is going to monitor developer to see that their commitments are realized? I have little confidence that the developer will follow through on his commitments. Words are cheap, once construction starts, funny how the worker bees didn't know they were not supposed to doze thru that area.	See Section 2.0 (Construction of Facilities) of MVE (2023).
5332-3	Marilyn Broek	Aggregates. Very few road projects in Idaho are new roads. We add lanes and widen and improve existing. 400 miles of new roads proposed for this project is more than Idaho has built in 40 years. Where is this road aggregate supposed to come from? Not from the lava that will be blasted from the foundation locations. It is dirty and soft. Often not allowed on State, FAA, Federal roads because of its lousy properties. And, draft EIS says need 3 on site concrete batch plants. How much concrete are we talking about? Concrete aggregate is difficult to find and crush. It must be so clean. And cement. Where is it supposed to come from? Our concrete paving projects have a difficult and spendy supply chain issue every year.	See responses to comments 6387-6 (see in Table A-3k, Mineral Resources) and 11535-142 (see in Table A-3w, Transportation).
5453-1	Brett Smith	My biggest concern with this project is the "fact" that wind turbine generators are not reusable / recyclable, but I've since learned that this is not entirely true (please convin me that such is so).	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
5503-2	Mark Hofhine	The major concerns I have are in regards to environmental views, waste, materials and wildlife. It appears MVE says they will mitigate wildlife issues somewhat but there will still be a lot of loss. How can I trust that MVE will care about the environment and resources? Where are the materials coming from? Many of the wind turbines in the US come from China. Has the structural integrity of these items been fully evaluated? Tall structures are more susceptible to structural fatigue. Where will the waste go? The aesthetics looks like it will be significantly impacted. The existing windmills are really an eyesore. Why would this be any different? Information provided says everyone in the magic valley area will see the windmills.	For information regarding wildlife, see the response to comment 11598-11 (see in Table A-3aa, Wildlife, including Big Game). Also see Section 5.0 (Environmental Considerations) of MVE (2023), which states, "protecting the environment and working with local communities are two important factors of MVE's development philosophy." Guessing the source for project materials would be speculative at this point. For information regarding how project components will be disposed at the end of their life span, see the Decommissioning Plan (Appendix L in MVE [2023]). For information about visual resources, see the response to comment 6837-1 (see in Table A-3u, Recreation).
6064-1	Raiza Giorgi	ind and solar have ridiculous costs to not just keep them maintained, but have you looked into how wind and solar are disposed once they are no longer viable? Aside from the environmental impact, wind farms are extremely noisy and they are a aesthetic blight on the landscape. Wind turbine blades can be extremely hazardous to birds, especially turbines that are built near migratory flight pattern areas. Wind turbines are very susceptible to damage from lightning because of their tall and metallic form, which, in very few cases can be dangerous for nearby animals or people. Another big disadvantage of wind energy is that no matter how great the technology becomes, a wind turbine will never be able to be more than 59.3% efficient according Betz's Law. Betz's law states that the wind which passes through the blades of a wind turbine can never be captured to more than a 59.3% efficiency because of the physical laws of moving parcels of air.	For information regarding the disposal of project materials, please see the Decommissioning Plan (Appendix L in MVE [2023]). See response to comment 11410-1 (see in Table A-3r, Noise) regarding noise levels, and comment regarding avian studies.
6382-2	Laurie Bourn	There will be lots of trucks and tractors and whatever other fuel guzzling vehicles needed to put these up all along OUR lava beds. And, these blades are not recyclible... where are you going to bury them? Plus, all of the fossil fuels just to lubricate them. Plus, all of the coal energy to manufacture them.	See the Decommissioning Plan (Appendix L in MVE [2023]) for information regarding the disposal of project components and Section F-5 (Waste Management Plan) of the Health and Safety Plan (Appendix F in MVE [2023]).
6382-3	Laurie Bourn	And, these blades are not recyclible... where are you going to bury them?	See response to comment 6382-2 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
656-1	Beth Elliott	What happens when mother nature comes through with any ice storm, tornadoes or hurricanes? Are these wind turbines strong enough to hold up to mother nature?	See response to comment 12398-16 (see in Table A-3f, Climate and Greenhouse Gas Emissions).
6820-3	Chris Callen	Who will clean these up when they fail?	See responses to comments 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) and 11491-28 (see in Table A-3f, Climate and Greenhouse Gas Emissions). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
6829-1	Linda Bush	I am 100% against wind farms anywhere. What happens when there is no wind? Do generators keep them going? Generators run on fossil fuels? How about the birds that get killed? What happens when the blades are no longer working? What landfill do they go in to stay forever? Put them on John Kerry or Al Gores property. The wind farms by Palm Springs are not working more than they are. Not a good idea. Please do not destroy Idaho with these monstrosities.	Generators collect power from the wind turbine and will not be used to power the turbines and is covered in the Section 1.3 (General Facility Description, Design, and Operation) of MVE (2023). Impacts on birds and bats are discussed in Section 5.0 (Environmental Considerations) of MVE (2023). See the Decommissioning Plan (Appendix L in MVE [2023]) for information pertaining to blades at the end of their life cycle.

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6840-1	David Thedens	Consider the construction of a smaller 120 foot turbine. Diesel powered earth movers must dig a significant hole for a foundation. Then up to 63 fully loaded diesel powered concrete trucks will be needed to pour the rebar (from china) reinforced foundation. Where is the nearest concrete factory? Diesel powered semi must transport the various blades and towers to the site where diesel powered crane will be used to assemble the unit. The 120 foot blades only last 5 to 10 years depending upon how many bird strikes occur. How many ducks, geese, and eagles are projected to die? Fiberglass has no half life. The current disposition is to bury the fractured blades in Montana. Major source of pollution. What is LS Powers current disposal proposal? The 120 foot turbines have a service life of 20 years. What is the service life of the larger turbines? Will LS Power remove the massive concrete foundations and the massive towers when they abandon the site? Currently there are 57,000 windmills producing 9% of the US energy production. To replace the fossil fuel generation of natural gas (40%) and coal (20%) we would need to build 360000 windmills whereas the US currently builds a little more than 3000 a year. Not practical at all. 75,000 windmills have been built, and I assume the off line or retired turbines are still standing. Eyesores forever.	See Section 3.4.1.2.2 (Alternative B [Proposed Action]) Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) of the draft EIS for estimates of the direct and indirect greenhouse emissions as well as Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) in EIS Section 3.4.2.2.2 (Alternative B [Proposed Action]). See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste) regarding turbine disposal and response to comment 11344-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1) regarding lifecycle GHG emissions. Impacts to avian populations from turbine collisions are described in EIS Section 3.3.2 (Avian Populations). As described in EIS Appendix 11 (Project Elements Common to All Action Alternatives), wind turbines would be completely removed during decommissioning and foundations would be removed to a depth of at least 3 feet.
6840-2	David Thedens	Of course LS Power will just declare bankruptcy after the profit dwindles leaving Idaho to dismantle the waste.	MVE, the BLM, and any other applicable agencies will meet prior to formal decommissioning per the Decommissioning Plan (Appendix L in MVE [2023]).
6868-1	Barbara Martie	Noted that the following areas were not completely covered. [...] The blade replacement and disposal has not been fully addressed. Blades are too long to be placed on trucks so need to be cut down to fit for removal. What is the effect of the fiberglass that would pollute the land? From what I have read blade replacement is no a minor matter 8,000 a year. Where would the blades be disposed until recycling blades becomes a reality? Local landfills introduce another environmental impact. Size of trucks to move the blades out of the area. Blade disposal is a key issue to affect the community.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
6883-2	Ron Moody	The EIS for Alternative B doesn't adequately address how these behemoth towers will be disposed of once their relatively short lifespan is reached. This will cause an environmental disaster for future generations.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
7333-1	Kenneth Hansen	Quoting Windpower Engineering Development, "Some wind farms report up to 20% annual energy production losses due to icing," says Matthew Wadham-Gagnon, a Pro-ject Manager at TechnoCentre eolien (TCE). TCE is a Canadian organization that sup-ports wind-industry development through research, technology transfer, and technical assistance for business. In addition to production losses, ice accretion can affect the structural design load case of a blade, as well as other components in a wind turbine. For example, ice shedding from a blade can damage other blades or hit the roof of the nacelle, adds Wadham-Gagnon. But quantifying or predicting the exact effects icing may have on a wind farm -- say, for a proposal or business case made to a financier -- is challenging because weather conditions change. "Icing could have a significant effect on the annual production of a wind project. It depends on the frequency, duration, se-verity, and intensity of icing which varies from year to year, site to site, and turbine to turbine, says Wadham-Gagnon." Then follows a list of developing methods to address the icing problem. I would suggest that this area is not suitable for the proposed 740' high wind turbines. The weather frequently brings sticky snow as well as heavy frost, and the possibility of an ice storm. It is not proven that propeller blades of that size can withstand the potential snow and ice loads.	See response to comment 11466-1 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
7339-2	Matt F.	In addition to the reduction in power output, turbine collapses present obvious safety issues. BLM should begin scrutinizing the warranty agreements that the project applicants have with the turbine manufacturers, as well as what insurance mechanisms are in place to replace the turbines when they collapse, which will inevitably happen. As the articles noted above, insurers are raising their premiums. This will no doubt lead to the applicants balking at paying for insurance. BLM should remain firm on this and require them to have insurance for every single piece of property involved in the project.	MVE would be responsible for purchasing appropriate insurance for wind turbines and other project infrastructure at their own discretion. As described in EIS Appendix 11 (Project Elements Common to All Action Alternatives) MVE would be required to purchase a reclamation bond prior to notice to proceed if the project is authorized. Also see response to comment 7346-1 (see in Table A-3jj, Legal or Policy Compliance).
7343-1	Matt F.	Please accept my comment regarding the Lava Ridge Wind Project EIS as it relates to the authority of BLM to completely halt the project during the operations phase, should it be approved. At the moment, and likely into the future, BLM is being asked to approve the usage of technology and associated machinery at a scale which has not been used before in previous BLM approvals in Idaho. For example, the EIS states on pp 2-4: "The generation capacity of Alternative B would be nearly 25% more than the largest existing wind facility in the United States" This means there is uncertainty on what the exact outcomes will be once the project enters the operations phase. BLM does its best to extrapolate from existing projects, but it can never be 100% certain. For that reason, if any alternative other than A, no build, is approved, BLM should put a caveat in their approval which states that if the impacts become unreasonably damaging to the environment, people, property or businesses, that they reserve the right to shut down the project completely at any point during the operations phase. This will help protect the public from negative impacts which were impossible to foresee during the EIS stage.	The NEPA process provides a disclosure of potential impacts using the best-available information at the time the NEPA analysis is conducted. It is not necessary to be 100% certain to conduct a meaningful analysis and comparison of alternatives. If the project is authorized, the BLM will continue to manage lands within the SFO for multiple use according to the BLM SFO's *Monument Resource Management Plan* (BLM 1986), as amended. The BLM will coordinate project operation details with MVE throughout the 30-year ROW grant.
7345-1	Matt F.	Please accept my comment regarding the Lava Ridge Wind Project EIS as it relates to the Rectification of Non-Compliance by the project applicant, Magic Valley Energy. The draft EIS volume 2a, appendix V and volume 3, appendix 10 discuss environmental compliance, monitoring and mitigation. They focus mainly on the construction phase of the project and do not satisfactorily address issues that can and will arise during the operations phase of the project. Specifically, they do not propose a person/method of contact, or a formal dispute resolution process which can be completed in a timely manner. Meaning, when a person, structure or business is injured in some way by the operation of the wind turbines, there is no formal process for the injured	See the Health and Safety Plan (Appendix F in MVE [2023]) along with the response to comment 11204-24 (see in Table A-3m, Human Health and Safety). MVE is committed to responsible management in all areas of health, safety, security, and environment. A more detailed Health and Safety Plan will be developed by the project team in cooperation with the BLM prior to construction.

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		party to file any type of grievance or notice of non-compliance. For example, in volume 1 page 3-431, Measure ww discusses how shadow flicker will be handled. It says turbines which are impacting residences with shadow flicker can be turned off while that is the case. However, what is the remedy for when more shadow flicker than predicted occurs? Or when it is occurring, but due to an oversight, MVE has not shut off those turbines? Who should the residents contact so they can order MVE to come into compliance with Measure ww? Further, the EIS doesn't account for emergency situations. Imagine a scenario in which a resident in the path of shadow flicker has a visiting relative who has something akin to photosensitive epilepsy in which flickering lights can trigger a seizure. That visiting relative immediately begins showing symptoms after they arrive at the resident's home. However, it is on a Sunday afternoon, when personnel are not in the BLM or MVE offices. Who or what is the emergency contact the resident can contact to have the turbine shut off immediately? Last, when a complaint is lodged, how long should the injured party expect to wait for MVE to become compliant? The EIS does not call this out, so it's safe to assume that residents could be left to suffer for weeks or months before MVE is brought into compliance. Therefore, if any alternative other than A is approved, there should be a 24 hour point of contact available for residents and businesses in the area to call to report non-compliance or other emergencies, such as a turbine catching on fire, which often happens. This point of contact should have emergency authority to order MVE to immediately come into compliance by whatever means are necessary, including shutting off turbines. Approving any alternative other than A without providing such a mechanism for compliance enforcement, dispute resolution and a requirement for a 24-hour point of contact is gross negligence because these injuries and disputes will inevitably happen.	
7376-1	Name Not Provided	I work for a local company that handles the communications not only for our company but also the local First Responders in the area. When the last windmills came to town out at Bell Rapids we ran into some issues with the communication system for the Regional 911 system. I was currently in charge of taking care of the communication system between the remote towers of the 911 system. We discovered that the Wind Turbines can cause a interference issue with the communications between the towers, by causing a disturbance in the FCC coordinated pathways between the towers. We talked with the engineers with the State of Oregon who had already experienced the interference that these turbines cause. In the Oregon case turbines had to be removed that were causing the issue. We were lucky enough to catch this early on and work with the engineers doing the project here in the Magic Valley to eliminate that issue from happening here. So now being not only a part of taking care of the 911 system, but also have our own FCC pathways going thru this area. I would like to see a similar approach taken to solve the issue before it happens. I know these construction guys promise the world. But until everyone is at the table and discussing the issue, things slip thru the cracks and are missed. With these being FCC coordinated pathways. All entities who have these licensed in the areas that will be impacted will have the right to request the removal of the turbine for interference issues. The owners should realize there could be a significant financial impact on their companies if this were to happen. So it makes since to get all the facts out there before a determination is made on these things.	MVE may investigate means of improving wireless communications on-site and will explore voice and data communication options through local providers per Section 3.3 (Related Facilities and Systems) in MVE (2023).
75-2	Janet Meredith	Please use the new Hemp batteries for storage as they last longer & are more eco friendly the previous types.	The proposed battery energy storage system will “consist of racks of electrochemical batteries,” as mentioned in Section 1.3.6 (Substations and Transmission Lines) of MVE (2023).
7794-2	Jefferie Wilson	Why aren’t we concerned about using renewable part, part that are recyclable, like the blades.	See Section L-2 (Disposal of Project Components) in the Decommissioning Plan (Appendix L in MVE [2023]), which states, “MVE will prioritize the re-use, recycling, or scrap value of decommissioned project components over direct disposal. . . . New industrial technologies that recycle turbine blades are currently gaining traction in the marketplace and are expected to increase in utilization over the lifespan of the project.”
8281-2	Ronald Buck	Battery technology to store large amounts (power in hundreds of Mega Watts) of power is nearly impractical and will create a hazard waste problem when they would have to be replaced along with disposable of blades once they have served their life span.	See Section F-5 (Waste Management Plan) of the Health and Safety Plan (Appendix F in MVE [2023]). See response to comment 869-4 (see in Table A-3dd, Plan of Development – EIS Appendix 1).
8421-3	Brian Olmstead	LS Power estimates they will only use about 304 acre ft of water during the 2 year construction phase. From my experience working with TFCC crews building and maintaining over 1,000 miles of dirt and gravel roads, I submit to you that if they plan on any reasonable dust control plan for their 500+ miles of new roads, just for dust control, they will need at least 3,000 acre/ft per year. (I will send you my calculations if requested). So for their 2 year construction (which they know is an impossibly short time to build this huge project) that would be 6,000 acre/ft! 20 times their estimate just for dust control. There are a couple of other options they could use for dust control: 1. No dust control, just let all their workers and everybody living on all sides live with choking dust. 2. Gravel all the roads, which again from my experience with TFCC, would take somewhere over 1 million cubic yards of gravel. (again with LOTS of water for compaction and to control dust.) 3. They could apply a chemical dust control method like Mag Chloride; which of course is basically a soil sterilant and has lots of bad consequences for the desert plants and wildlife.	See responses to comments 10509-1 (see in Table A-3z, Water and Wetland Resources), 1042-14 (see in Table A-3z, Water and Wetland Resources), and 3811-4 (in Table A-3v, Soils).
8670-2	Nancy Huddleston, Terrell Huddleston	I can’t imagine managing this Lava Ridge project during construction, operation, or decommissioning. Who is going to monitor that work is progressing properly? Who will enforce compliance with this EIS once it is corrected? The Lava Ridge engineers will get well paid, Las Vegas and California will get very expensive power, China will get paid for manufacturing, but BLM, Idaho and taxpayers will be left dealing with Lava Ridge after we correct course and install something that will address our needs like small nuclear power plants. California, Idaho, and BLM will each be far ahead to walk away from these ill-conceived wind turbine projects. The headaches are just beginning, many more are proposed!	See the Decommissioning Plan (Appendix L in MVE [2023]), the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]), and the Construction Monitoring Plan (Appendix P in MVE [2023]).

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869-4	Michael Crout	You show the advantages but is it really worth it, having another country handle the dirty aspect of production. A country that doesn't have the same EPA rules/laws as the U.S. Whatever is polluting the earth in one area will pollute the whole planet. Nothings mentioned about maintenance and the side effects of items that are not recyclable. In short, is this a dog and pony show that's doing more damage than good. Effective yes, taking a look at the whole, efficient no.?	Maintenance is discussed in Section 4.0 in MVE (2023), and the Decommissioning Plan (Appendix L in MVE [2023]) covers disposal of project components, including prioritizing "the re-use, recycling, or scrap value of decommissioned Project components over direct disposal."
878-1	Cathy Lee	Thank you for the opportunity to provide feedback on the Lava Ridge project as part of the public permitting process. I know that wind power seems like a good source of energy and that new temporary jobs would open up while the turbines are being installed but what happens in a few years when these turbines start to break down? Will the company that installed them be able to repair them? Is it cost effective to repair them or will they be left standing on the land forming a graveyard of wind turbines?	There will be O&M buildings on site that allow staff to perform "routine maintenance, long-term maintenance, and emergency work" per Section 4.0 (Operations and Maintenance) of MVE (2023).
8984-1	Diana Nielson	The Decommissioning is more destructive than the construction of Lava Ridge. The disturbance of the struggling ecosystems to recover from the construction and maintenance of Lava Ridge Wind Turbine Project. More loss of fagile soils, vegetation, habitat, mule deer, pronghorn, elk, sage grouse, pigmy rabbits, Bob cats, bats, badgers, coyotes, fox, skinks, lizards, snakes, burrowing owls, eagles, monarch butterflies and the list goes on and on. The grazers will be displaced again and it will take decades. Generations of recreational choices will be lost. Concerning Volume 1, Chapter 3 Appendix 11 pages 11-19 The decommissioning doesn't mention where the wind turbines will be disposed and recycled. How will all of the synthetic oils will be disposed? Where will the the rare earth minerals go? How will the Wind Turbines be taken down? It is very expensive to do. Will they be taken down in pieces or will the use of explosives to drop them over and down be used? Where can they be recycled? The wind turbines are supposed to decrease carbons. The rare earth minerals the magnets in the generators are made with produce toxic heavy metal and radioactive waste. The Rare earth minerals that will be used in the Large Battery Storage Stations: Where will they be disposed? Where is the Large Storage Battery recycle facility? We use these rare earth minerals in lasers and other equipment but that waste is very small compared to one 4 or 6 MW Generator in a Wind Turbine. The decommissioning will disrupt the ecological systems that will still be trying to recover from the construction and maintenance phases. The Decommissioning plan is speculative and inadequate. The consequential damages can not be recovered. To build the Wind Turbines is more distruction and waste. The excuse of carbon emission reduction is invalid when you consider the cascade of other toxic wastes and the carbons it takes to build the Lava Ridge Project. Rare Earth Elements: A Resource Constraint of the Energy Transition kleinmanenergy.upenn.edu Lava Ridge Wind Project Draft Environmental Impact Statement Appendix 11. Project Elements Common to All Action Alternatives. Page 11-19 The blue ink questions the draft EIS project Project Decommissioning and Final Reclamation Prior to formal decommissioning, MVE, the BLM, and any other applicable agencies would meet to determine whether specific infrastructure or civil works offer public benefits and if they should remain in place (e.g., specific roadways or infrastructure). If the agencies determine that it is in the public interest for some project infrastructure to remain, appropriate steps would be taken to secure the necessary approvals or transfer of ownership. Project decommissioning and reclamation (hereafter referred to as decommissioning) would be completed over a 2-year period. The estimated duration of decommissioning is based on the amount of equipment mobilized, crew sizes, weather and climate conditions, and overall productivity. The goal of decommissioning would be to remove the installed power generation equipment and return the site to similar conditions as the undisturbed surrounding areas, as much as is feasible. The major activities required for the decommissioning would be as follows: • Remove wind turbines and met towers. How will the wind turbines be taken down? The current practice on Bell Rapids is using explosives because to dismantle is to expensive. Other projects on Public Land have been abandoned by the project owners and the government left with the responsibility of reclamation. (In example Pope Shannon mine in Lemhi County the USFS was stuck with reclamation and the Bond didn't cover the expense) • Remove overhead electrical system and lines buried less than 2 feet below grade What will be considered grade? The original surface of the land or the build site? • Remove structural foundations in accordance with a BLM-approved Decommissioning Plan (preliminary draft in Appendix L of MVE [2022]) They are not removing the structures this statement is misleading. • Remove roads not desired for other purposes The removal of roads will re-disturb what soil and vegetation has taken root. This also will disrupt the wildlife again. • Re-grade and recontour the disturbed area. The contour of the Lava Ridges, Blow outs, cinder cones and Lava Tubes you will not be able to restore or recontour geological features. This also will contribute to the Fugitive dust with the covering of vegetation, wetlands, cultural sites and more soil erosion . • Reapply topsoil and revegetate How will fragile topsoils be saved? Some of the vegetation is very slow growing and who will maintain the invasive vegetation after the lease is up? 5 years is not lang enough to nurture fragile soil with slow growing native vegetation. The disassembly and removal of wind turbines and met towers, including the large components that make up a wind turbine, would essentially be the reverse order of the installation activities. Further details on decommissioning are in MVE's Decommissioning Plan (Appendix L of MVE [2022]) and summarized below. What is the guarantee this will be done? A Bond is only monetary and does not pay for wildlife and cultural loses. Disturbed areas would be reclaimed postconstruction following MVE's Reclamation Plan (Appendix E of MVE [2022]). MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria. Reclamation areas would be monitored until the success criteria is met or up to 5 years following the initial reclamation activities. If at the end of the fifth year of monitoring a reclaimed area does not meet the reclamation success criteria, MVE and the BLM Authorized Officer would	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).

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		discuss possible adjustments to the criteria or the use of adaptive management procedures to address revegetation challenges. Reclamation success is defined by the re-establishment of vegetation and topography compared to conditions in the surrounding area at the time of reclamation. This definition is inadequate, weak and not attainable. You can't recline what has been destroyed. The glossing over the destruction is misleading. Option A: No Build is the only option. Stop Lava Ridge! Stop Salmon Falls! Stop Taurus! A concerned citizen Diana Nielson	
9013-1	Jerry Daniels	Dear Mr. Prestwich, [Form I am writing to express my views on Magic Valley Energy's Lava Ridge Project.: 93.3%] You do not need to be spending millions on destroying land so that you can impress the democrats!! Everybody knows that you NEVER get out of wind power what you put into it!! You create unsightly landscapes and have to use extreme amounts of oil, anyway!! And then there is the massive oil leaks that happen!! What about the massive energy consumed to make the parts? The use of fuel to transport the parts? The output of the windmill is too small compared to the energy put into building and transporting it! Anybody in there right mind would say no to this! SINCERELY	The project is estimated to generate 500 kV of energy (Section 1.1 [Introduction] of MVE [2023]) and possible oil leaks are addressed in the Spill Prevention, Control, and Countermeasures Plan (Appendix G in MVE [2023]). See response to comment 11188-5 (see in Table A-3jj, Legal or Policy Compliance).
9080-37	The Coalition to Protect America's National Parks	C. Section 2.3.3 Project Phases and Duration (p. 2-3) – As described, "[t]he EIS analysis assumes an approximate project schedule consisting of three phases: 2 years of construction, up to 30 years of operation and maintenance, and 2 years of decommissioning." (Emphasis added) We ask BLM to explain the basis for its assumption that the wind farm would have an operational lifespan of (only) 30 years. We cannot imagine that would be the case, particularly considering the considerable investment MVE would need to make in constructing, operating, and maintaining such a massive wind farm. Based on the proposed action, we fully expect adverse effects to cultural sites would be so long-term that they are, in effect, permanent. If BLM decides to approve the proposed wind farm in any form and is serious about limiting the duration of its operation, then we request that BLM formalize the assumed 30- year limit with a "date certain" expiration date in the ROW grant that includes only two additional years for decommissioning and removal of the wind farm. If BLM is not willing to enforce its "30-year assumption" with such a measure, then BLM should at least be transparent about the fact that the adverse effects of the wind farm are likely to last longer than 30 years.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste).
9473-3	Jeffrey Warren	How will fire abatement be implemented? You won't be able to fight fires from the air with turbines that tall. Reports say that the wind pattern in this area is poor at best. Why not find a better site?	See AIB-11 in EIS Appendix 3 (Issues Analyzed in Brief): How would the project impact emergency responders that serve the project vicinity? Impacts to fire suppression, including aerial suppression, are disclosed in EIS Section 3.7.1 (Wildfire Ignition, Spread, Response, and Suppression). As described in Section 1.2 (Purpose and Need) in MVE (2023), "The proposed Project location was selected based on the quality of the wind resource in the area, the power markets accessible by existing and planned transmission lines in the area, the availability of suitable land, and the absence of land use constraints."
956-2	Bill Doll	What is the plan for recycling these windmills in 20 years when their generation efficiency drops to the point where the produce no electricity?	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
9591-2	John Barry	I'd also like to know what is to be done with these monstrosities after their lifetimes have expired.	See response to comment 11873-7 (see in Table A-3l, Hazardous Materials and Solid Waste). Also see response to comment 11926-11 (in Table A-3l, Hazardous Materials and Solid Waste).
9778-1	William LaMunyan	Does the power created at lava ridge stay in Idaho for Idaho usage?	See response to comment 11822-5 (see in Table A-3bb, Applicant's Interests and Objectives).

NEPA Process Category Topics

Alternatives

Table A-3ee. Alternatives

Comment ID	Commenter	Public Comment	Response to Comment
1022-3	Amy	After analyzing the project and listening to public comments, I urge you to now move your Lava Ridge to a more appropriate site for generating power for the States of Nevada and California.	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. Moving the project to Nevada or California would not meet this part of the BLM's purpose and need to respond to MVE's application.
1042-2	WildLands Defense	There is no adequate range of alternatives. A Supplemental EIS must be prepared, with a range of reasonable alternatives using DIFFERENT and innovative types of much shorter and less lethal turbines, and with development of far fewer turbines closer together must be considered, as well as comparisons with how much energy would be generated with solar arrays, the relative greenhouse gas emissions, etc	The EIS describes the alternative development process in Chapter 2 (Proposed Action and Alternatives). The BLM will consider all alternatives analyzed in detail in the EIS and the mitigation measures in Appendix 4 (Mitigation), when making the decision whether to authorize MVE's project. The BLM is responding to MVE's application for a wind generation facility, not a solar generation facility. Evaluating solar panels would not meet the BLM's purpose and need to respond to MVE's application. Turbine size, design, layout, and siting corridors were developed considering wind resource data and requirements needed to develop a technically feasible project. In MVE (2023), see Section 1.0 (Project

Comment ID	Commenter	Public Comment	Response to Comment
			Description), which includes Section 1.3 (General Facility Description, Design, and Operation) and Section 1.4 (Alternatives Considered by Applicant), as well as Alternatives Considered by MVE (Appendix C in MVE [2023]). For information about the turbines and construction, see Section 2.9 (Wind Turbines) of MVE (2023). If the project is authorized, the turbine specifications will be determined by MVE (see Section 5.3 [Design Criteria] of MVE [2023]). For information about greenhouse gas emissions see EIS Section 3.4 (Climate and Greenhouse Gases).
1042-24	Wildlands Defense	[The DEIS fails to analyze a truly REASONABLE alternatives range –and fails to take into account the full range environmental degradation and impacts and reduced value to private lands, and fails to examine alternatives such as much reduced turbine height, entirely different turbine designs, etc.].	See response to comment 1042-2 (see in Table A-3ee, Alternatives). Environmental impacts are addressed in EIS Chapter 3 (Affected Environment and Impacts), including Section 3.6.4 (Residential Property Values). Additional environmental considerations are addressed in EIS Appendix 3 (Issues Analyzed in Brief).
1043-1	KS McMullin	Instead of making tall wind fans, that have to be turned in the direction of the wind, would it not be more practical to make vertical wind mills? They do no have to be turned and they take up less room making easier to have more turbines in less space.	The BLM is responding to MVE's application for a wind generation facility. If the project is authorized, the turbine specifications will be determined by MVE.
10471-1	Brett Lemmons	if California, Oregon want/need power, let them destroy their public lands, that should be the TOP OF THE LIST.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
10492-2	Michael Lavey	I firmly believe that electrification projects should be foremost associated with a more local need. Build these kinds of big intrusive projects where direct use and benefit occur	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
10494-1	Name Not Provided	There are other locations that are appropriate and can reach Biden's goal of permitting 25 GW by 2025 on public lands. This location should be removed from the potential projects;	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
10500-2	Nancy	There is plenty of land in California and Nevada to install them, the power is for them, let them have them, leave our beautiful state alone.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
10504-2	Bryan Russell	private land and private dollars is the only way this should happen.	The BLM is responding to MVE's application for a wind generation facility on public land. Evaluating non-BLM land would not meet the BLM's purpose and need to respond to MVE's application.
10505-1	Name Not Provided	Please site wind turbines so that there is the least impact to wildlife. It is possible to move forward with the project, maybe at a smaller scale or with re-siting of turbines, and protect some of the most important wildlife values, particularly for migration.	The EIS addressed environmental analysis in Chapter 3 (Affected Environment and Impacts). The following environmental considerations are addressed in this chapter: air quality, avian and bat species, climate and greenhouse gases, cultural resources, environmental justice and socioeconomics, fire and fuels management, land use and realty, livestock grazing, paleontological resources, pollinators and insects, recreation, soils, transportation, vegetation, visual resources, water and wetland resources, and wildlife. Information about migration and impacts to migration as a result of the Proposed Action and alternatives can be found in Section 3.3 (Avian and Bat Species). Specifically, you can read about bat use in the siting corridors in Section 3.3.1.1.2 and impacts (to bats) in Section 3.3.1.2. You can read about avian use in the siting corridors in Section 3.3.2.1.1 and impacts (to avian species) in Section 3.3.2.2.
10509-3	Sue Page	Build these 740ft beasts were they can best service the end user, Nevada or California.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11204-3	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	DEIS did not: (a) develop an adequate range of alternatives to address resource conflicts, particularly relative to public land livestock grazing upon the Star Lake Allotment;	The EIS provides analysis on livestock grazing impacts in several sections. Section 3.9 (Livestock Grazing) analyzes the impacts of the Proposed Action and alternatives in detail. Additionally, information about livestock grazing and the Star Lake allotment can be found in the Grazing Coordination Plan (Appendix S in MVE [2023]). As demonstrated in the alternatives comparison tables throughout Section 3.9.1.2 (Impacts), the range of impacts varies among alternatives. See also response to comment 1042-2 (see in Table A-3ee, Alternatives).
11209-1	Linda Ando	The opportunity to consider other alternative Wind Project lands that are not encroaching historic sites is an option that can be explored.	See response to comment 11455-2 (see in Table A-3ee, Alternatives).
11269-1	Clare Josaitis	According to the BLM's Final Programmatic Environmental Impact Statement for Wind Energy Development on BLM-Administered Lands in the Western United States (BLM 2005a), to which this DEIS tiers, the wind resource potential was measured by the DOE's National Renewable Energy Laboratory (NREL). According to the maps in Wind Energy EIS, the wind resource potential measured in the proposed project areas is "low". EPA.gov states that wind turbines are 20% to 40% efficient at converting wind into energy. Given the low wind resource rating and the inefficiency of wind turbines for producing energy, how can there be any justification in building these turbines?	The BLM is responding to MVE's application for a wind generation facility. The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. MVE completed sitting analysis and the latest computer modeling to assist in their selection of the project area as a viable wind energy facility. MVE has also established meteorological stations to gather additional information on the wind resources within the project area. MVE outlines their consideration for siting the project in the general area and earlier efforts to develop the project in other locations. This information can be found in MVE (2023) and in Alternatives Considered by MVE (Appendix C in MVE [2023]).
11327-5	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	Given the highly sensitive relationship between successful migration and population resiliency, we recommend the BLM develop new alternatives that completely avoid siting corridors in the path of these migrating and wintering animals.	See response to comment 11327-7 (see in Table A-3ee, Alternatives).

Comment ID	Commenter	Public Comment	Response to Comment
11327-7	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	III. Given conflicting nature of alternatives presented in DEIS, BLM must provide new alternative(s) that takes all wildlife into account. When viewed through the lens of multiple wildlife species, specifically pronghorn and Greater Sage-grouse (sage-grouse), our organizations are troubled by the range of action alternatives. It seems that, if an action alternative must be selected, wildlife advocates would be forced to choose between increased development within the Owinza pronghorn migration or increased development in some of the last remaining intact sagebrush East of Crestview road, which sage- grouse have been known to occupy (comments related to Greater sage-grouse are further below). For example, Alternative D eliminates siting corridors East of Crestview road, but maintains a greater number of turbines and corridors throughout the path of the Owinza pronghorn migration, especially at its southern terminus. Alternative E eliminates much of the development within the southern terminus of the migration route but places siting corridors East of Crestview road and wraps around the eastern edge of the Greater sage-grouse lek buffer, as shown in Figure 2. We do not support this approach – of having to choose which species, both iconic Idaho native species revered by sportsmen and outdoor recreationists, will receive be fortunate to experience fewer negative impacts at the other's expense. In our scoping comments, we asked if the BLM found "an overlap of the project area in functionally available winter range, alternatives that minimize impacts to these areas or avoid them altogether must be developed and considered." We are greatly disappointed that the BLM did not take this suggestion into consideration when developing the range of alternatives. Because of the development in the identified Owinza pronghorn migration route in each of the action alternatives, we cannot support any action alternative. Therefore, BLM should develop a new alternative(s) that takes all wildlife into account.	The EIS provides information on alternatives and the alternative development process in Chapter 2 (Proposed Action and Alternatives). The BLM evaluated a Preferred Alternative in the final EIS that provides an assessment of reduced disturbance to big game migration routes and winter concentration areas. Impacts to pronghorn can be found in Section 3.18.2.2 (Impacts). Impacts to greater sage-grouse can be found in Section 3.3.4.2 (Impacts).
11354-1	Robert Hendricks	Should it be decided to move forward with any level of wind development in this area, I suggest a notably smaller alternate be investigated that would focus construction generally adjacent to and South of Highway 24, extend no further South than the noted West-side Energy line and be bounded to the East by Crestview Rd...essentially this proposal includes only those development areas that are common to both Alternative D and Alternative E (per Fig. ES-2). This proposal would still allow for key energy infrastructure connections, would cause notably less overall land use disturbance and siting issues, and would still provide for future expansion opportunities should the project ultimately prove to be as minimally disruptive to both game and avian species as it is currently being presented. My request in this situation would be for the BLM to ONLY move forward in small increments.	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. The EIS provides information regarding the alternative development process in Chapter 2 (Proposed Action and Alternatives). Section 2.8 (Preferred Alternative) provides further details and rational regarding alternatives the agency considered but were eliminated from detailed analysis. The BLM has prepared a full and detailed analysis with robust public participation with the NEPA process supporting requirements for a hard look in BLM decision-making.
11393-1	Lawrence Cates	TAke the project to California or Nevada where the power will be used.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11396-7	Gina Jerke	I don't believe that there will be "minimal to no damage" as stated in the DEIS. All habitat will be adversely affected[...]	The EIS addressed environmental analysis in Chapter 3 (Affected Environment and Impacts). The following environmental considerations are addressed in this chapter: air quality, avian and bat species, climate and greenhouse gases, cultural resources, environmental justice and socioeconomics, fire and fuels management, land use and realty, livestock grazing, paleontological resources, pollinators and insects, recreation, soils, transportation, vegetation, visual resources, water and wetland resources, and wildlife. The EIS provides information on impacts on wildlife specifically in Sections 3.18.1.2, 3.18.3.2, and 3.18.4.2.
11411-1	Rayma Cates	Windfarms should be located closer to the states where the power is needed.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11445-2	Mei Reifer	if some one want it should build in their on private land	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11455-2	Aiko E. Low	I would like that the turbine heights be diminished if they are respectfully placed close to Minidoka National Historic Site. A few "standard size" turbine towers placed farther away, instead of the newer, taller versions, would be less of an eyesore and less disruptive. Moving the bulk of the turbine towers farther away would not eliminate them from view but the noise would be reduce.	The BLM evaluated a Preferred Alternative in the final EIS that includes a maximum turbine tip height limit for all turbines of 660 feet. The Preferred Alternative also increases the distance of turbine corridors from Minidoka NHS. The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. Also see response to comment 1042-2 (see in Table A-3ee, Alternatives). Alternatives, including those considering nearby historical sites can be found in Chapter 2 (Proposed Action and Alternatives). "A siting consideration for alternatives development was the proximity of the project to the Minidoka NHS, a World War II–era Japanese American incarceration site located in Jerome County. As described further in Section 3.5.2 (Minidoka War Relocation Center and Minidoka National Historic Site), the incarceration site encompasses approximately 152 acres and is managed by the NPS. The site comprises the central portion of the original approximately 34,000-acre Minidoka WRC. The area within the Minidoka WRC boundary is now a mixture of federal, state-, and privately-owned land. Because scoping comments identified the potential for impacts to the Minidoka NHS, alternatives were developed to avoid or minimize impacts to the site. Impacts to both Minidoka NHS and Minidoka WRC are described in Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities)." See also response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
11458-6	Kathy McKenzie	Existing electrical corridors must be used and incorporated in any of the alternatives --If the application is approved.	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. Figure 1.3-1 of the EIS shows the proposed siting corridor layered with the existing transmission corridors. Table 2.4-1 shows project components by action alternative, including information regarding substations, interconnection, and collector lines. Figure 2.4-1 shows the siting corridors of each alternative layered with transmission corridors. Detailed information about electrical infrastructure can be found in EIS Section 3.1 (Introduction and Methodology) as well as in Section 2.10 (Electrical) in MVE (2023).
11468-3	Randy McCarron, Jane McCarron	I've been told this energy will be sent to California. California is in trouble because of their inefficient green energy policies. Let them figure out solutions to their own problems	See response to comment 1022-3 (see in Table A-3ee, Alternatives).

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11507-2	Kathryn	Magic Valley Energy, a private business, needs to purchase private land if they are wanting to install hundreds of wind turbines for their business.	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. The BLM makes decisions regarding managing public lands, and so private land development is out of scope for this EIS.
11518-4	Karen Steenhof	The BLM should take a more comprehensive look across all of southern Idaho to identify any alternative areas that might be appropriate for large-scale renewable energy development. Any such analysis should include a detailed evaluation of impacts on all sensitive wildlife species including not only eagles, bats, sage-grouse, and pronghorn but also Long-billed Curlews, Burrowing Owls, Short-eared Owls, Ferruginous Hawks, and Brewer's Sparrows. Populations of most of these species are already declining.	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. Projects sites outside this application are out of scope for this EIS.
11521-3	Angela Mooney	Relocate this where it is not over an aquifer, where the blasts that will occur to lay the cement foundations will not impact the ceiling of an aquifer this size and of this significance.	See response to comment 1042-14 (see in Table A-3z, Water and Wetland Resources). Additional information about groundwater contamination is found in the issue analyzed in brief, AIB-47. The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-North. Project sites outside this application are out of the scope for this EIS.
11524-1	Name Not Provided	To Lava Ridge, you should put them in CA. Or Nevada. Nevada has plenty of wind areas where no on lives close by.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11534-8	Matt Arnold, William Eubanks	As outlined above, the Project's four action alternatives differ only with respect to the locations of their respective siting corridors. See supra at 4-5; see also DEIS at 2-4–14. None of those alternatives, however, consider any operational restrictions, including those that might benefit wildlife by dramatically reducing the number of fatalities and injuries resulting from the Project. Although the Project proponent has ostensibly committed to certain "curtailment measures" for all action alternatives, these are limited to feathering and would only be implemented "when wind speeds are below the cut-in speed for the turbine (i.e., the speed at which wind turbines begin generating electricity)." DEIS at 3-47. In other words, the curtailment measures only apply when it is economically advantageous for the Project proponent, MVE. NEPA, however, requires Department of Interior agencies to consider all "alternatives that are technically and economically practical or feasible and meet the purpose and need of the proposed action." 43 C.F.R. § 46.420(b)-(c) (emphases added); see also 40 C.F.R. § 1502.14. Given the significant population-level effects threatened by the Project, infra, e.g., at 16- 17, BLM should consider alternatives that condition authorization on operational limits that further reduce impacts to avian and bat species.	The BLM added additional project-specific mitigation measures to stipulate that the BLM Authorized Officer may require the implementation of a curtailment strategy at any time, even if other adaptive management measures have not yet been implemented. The curtailment strategy will include different levels of curtailment (e.g., cut-in speed, number of turbines, season/duration) to allow for an assessment of which variables have the strongest effect on fatalities. The BLM, USFWS, and MVE are coordinating regarding details of the BBCS (Appendix M in MVE [2023]) and Eagle Conservation Plan (Appendix T in MVE [2023]), and these would be applied to the project, if authorized.
11535-6	Steven Andersen	By failing to consider interconnection of the proposed action for SWIP North and LS Power's interconnection, the impact analysis and comparison in the DEIS to a No Action Alternative is flawed from inception. The No Action Alternative permits a comparison of the environmental consequences of the status quo to the consequences of the proposed action, which cannot be done without a complete picture of the entire project.	The EIS provides information regarding the project description in Chapter 1 (Introduction). Additional information on the project elements and construction is provided in MVE (2023). In MVE (2023), descriptions of the construction of electrical components can be found in Section 2.0 (Construction of Facilities). Additionally, information regarding transmission system interconnection can be found in Section 3.0, Related Facilities and Systems. These actions and their impacts are included in the NEPA analysis provided in the EIS. Information about the detailed impacts analysis by issue can be found in Chapter 3 (Affected Environment and Impacts).
11535-7	Steven Andersen	Further, the No Action Alternative was inadequately discussed and analyzed, which means it was not an accurate baseline for the other alternatives. The DEIS states that the Purpose and Need of the proposal is to broadly respond to MVE's application for a ROW to construct, operate, maintain, and decommission a wind energy facility on federal land. But the DEIS analyzes the consequences of the No Action Alternative by simply focusing on federal and regional renewable energy goals, noting that those goals would have to be met using other alternative energy projects at other locations. In fact, at a hearing on the FY 2024 budget requests for the BLM, when Congressman Mike Simpson asked BLM Director Stone-Manning about the Lava Ridge project's consequences on habitat and the environment, she began by answering, "…we are working hard to meet Congress's request that we get 25 gigawatts of renewable energy and the President's request that we get 25 gigawatts of renewable energy on our public lands by 2025…." 7 It is concerning that political pressure to meet arbitrary goals is primarily influencing the analysis of the No Action Alternative, rather than any identifiable environmental impacts. Further, the proposed action and need, as defined in the DEIS, is for a wind energy facility on federal land. To assert "green energy" benefits will be obtained in the region is speculative at best. The BLM would effectively allow degradation of Idaho land (the geographic region being considered in the DEIS) to put additional wind energy on the open energy market with the stated benefit of contributing to federal initiatives. The only potential benefits of the project – to arguably expand "clean" energy – would not be realized in the region burdened by the environmental impacts (Idaho), as the energy will, in all likelihood, never be consumed in Idaho. Consequently, the No Action Alternative will have no negative impacts for the region subject to the Proposed Action but may have political repercussions for an agency under pressure to meet federal renewable energy goals. Nevertheless, this is misplaced in a NEPA analysis. Without adequately establishing the No Action Alternative, the other alternatives cannot be meaningfully analyzed in comparison.	The BLM's project purpose and need and decision to be made are described in Sections 1.2 and 1.3, respectively. The BLM considered each alternative, including the No Action alternative, presented in the EIS. EIS Chapter 2 provides information on the alternatives development process (Section 2.1) and on the No Action alternative (Section 2.2). Under Alternative A, no project impacts would occur; the potential for ongoing and future impacts would be the same as those described in each Chapter 3 Affected Environment section for existing and future trends and actions.
11535-8	Steven Andersen	DEIS TREATMENT OF ALTERNATIVES SHOWS AN IMPROPER BIAS IN FAVOR OF THE PROPOSED ACTION The treatment of alternatives shows a clear bias in favor of the Proposed Action, and thus, the DEIS fails to give substantial treatment to the other alternatives, as is required.	The BLM decision to be made is described in Section 1.3, as follows: "This EIS provides the information and environmental analysis necessary to inform the BLM's Authorized Officer and the public about the potential environmental impacts from the project. The BLM decision to be made will include • whether to grant, grant with modification, or deny a ROW to construct, operate and maintain, and decommission the proposed wind energy facility on public lands;

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			• the most appropriate location for the project on public lands; and • the terms and conditions (stipulations) for the construction, operation and maintenance, and decommissioning of the wind energy facility on public lands that should be applied to the ROW." Full descriptions of the alternative development process and action alternatives is provided in Chapter 2 (Proposed Action and Alternatives).
11535-10	Steven Andersen	The DEIS falls well short of devoting substantially similar treatment to alternatives as it does to the Proposed Action. The DEIS is glaringly biased in favor of the Proposed Action. To illustrate as much, one need only look at the brief and bare nature of the discussions for the various Alternatives presented for each of the identified affected environment and impacts. For example: - With respect to greater sage-grouse, the DEIS spends pages 3-115 to 3-124 on the Proposed Action's impacts, a total of 9 pages. Conversely, Alternatives C-E on the impacts to greater sage-grouse consist of less than one page each, at most.16 - With respect to bats, the DEIS spends pages 3-44 to 3-53 on the Proposed Action's impacts, a total of 9 pages. Conversely, Alternatives C-E on the impacts to bats consist of less than one page each, at most.17 - With respect to avian populations, the DEIS spends pages 3-72 to 3-84 on the Proposed Action's impacts, a total of 12 pages. Conversely, Alternatives C-E on the impacts to avian populations of a combined two total pages, 3-84 to 3-85. - With respect to environmental justice and socioeconomics, the DEIS spends pages 3-197 to 3-210 on the Proposed Action's impacts, a total of 13 pages. Conversely, Alternatives C-E on the impacts to environmental justice and socioeconomics consist of only 3 and a half pages, at most.18 - With respect to Alternative A, the DEIS simply points to the federal government's alternative energy goals, acknowledging the political pressure upon the agency, rather than a reasoned analysis of environmental consequences. It does not state that the goals cannot be met with projects elsewhere but just that they will need to be met with alternative projects. Examples are riddled throughout the DEIS. It is undisputable the DEIS failed to devote the same degree of analysis to each of the alternatives for each of the identified impacts (not to mention those impacts that have not been identified), and consequently, the DEIS is wholly unsatisfactory. Further, there is not an adequate range of alternatives. The selection determination of alternatives was subjective and not based on defined criteria. Wind energy can be selectively developed on sites that are already disturbed (e.g., reclaimed mines, agricultural fields, industrial sites) because of the widespread availability of this resource.19 The proposed plan here would require undisturbed land to be sacrificed. No alternative includes placing this project on a site already disturbed.	See comment responses to 1022-3 (see in Table A-3ee, Alternatives) and 11598-7 (see in Table A-3ee, Alternatives). Also, Alternative B is the largest alternative, making it the most impactful to resources and resulting in the most analysis language. Other alternatives were developed to reduce impacts and result in less resource disturbance and effects, making those analyses shorter. Not repeating text that describes the types of effects that may occur across multiple alternatives is standard in an EIS.
11535-11	Steven Andersen	Additionally, without specifics on the siting of the turbines within the alternatives, it is impossible to analyze most of the environmental impacts, including but not limited to, radio and electromagnetic interference, noise, consequences caused by roadways, environmental justice and impacts to wildlife, and therefore to ensure suitable alternatives are being considered and appropriately compared.	Methodology of the impacts analysis of turbine siting corridors is provided in Section 3.1 (Introduction and Methodology) of the EIS; also see response to comment 1042-2 (see in Table A-3ee, Alternatives). Find a detailed analysis of electromagnetic interference in Section 3.8.1.1, roads in Section 3.14, wildlife in Section 3.18, and environmental justice in Section 3.6. Noise-related impacts are discussed in several sections specific to the issue analyzed; analysis of noise impacts on avian and bat species can be found in Section 3.3; impacts to environmental justice communities can be found in Section 3.6.1; impacts to cultural resources can be found in Section 3.5; impacts to wildlife can be found in Section 3.18; and impacts to livestock can be found in Section 3.9. Table ES-2 summarizes and compares the impacts of the action alternatives on the issues analyzed in the EIS.
11535-151	Steven Andersen	The DEIS fails to provide an alternative (other than Alternative A) that makes any colorable attempt to minimize aesthetic impacts by noticeably reducing the height of the turbines or scale of the project.	The EIS provides information on the impacts to visual resources in Section 3.16 (Visual Resources) and includes impacts to travelers, visitors, and residents. Visual impacts are also analyzed in Sections 3.5 (Cultural Resources) and 3.19 (Minidoka National Historic Site Interpretive Purpose). Table 3.16-4 compares the visual impact of each alternative. Mitigation measures to minimize impacts can be found in Tables App4-2 and App4-3 in EIS Appendix 4 (Mitigation) and additional project-specific measures can be found in Table App4-4 in EIS Appendix 4.
11535-171	Steven Andersen	Further, as reiterated herein, without knowing the location of infrastructure and activities within the general corridors, the efficiency (see discussion on wake effect), potential impacts, and overall site suitability, cannot be adequately analyzed. The exact location does matter – for purposes of analyzing construction disturbance, wake effect, roads, electromagnetic interference, socioeconomic impacts, habitat interference, noise, etc.	See response to comment 11535-11 (see in Table A-3ee, Alternatives).
11598-5	Idaho Conservation League	Another alternative that the BLM could investigate is a greatly reduced turbine configuration in the gap between pronghorn, sage-grouse habitat, the Minidoka National Historic Site and Wilson Butte Cave. See figure 1 below showing the narrow band in the middle of Alternative C. These other alternatives would still need to be reviewed by the public to see if they sufficiently address concerns.	See response to comment 11598-7 (see in Table A-3ee, Alternatives).
11598-7	Idaho Conservation League	Alternatives not in the DEIS One alternative that the BLM did not develop in detail is permanent protections of the Pronghorn Migration Route, remaining areas with conservation value for sage-grouse, the viewshed around the Minidoka National Historic Site and original relocation center area, and Wilson Butte Cave and other cultural areas. ICL recommends the BLM develop a proposal that analyzes these protections and then evaluates the potential for turbine strings in between these protected areas (essentially the middle of Alternative C), or deem the entire area unsuitable for development. See figure 1 below. 2 https://www.blm.gov/policy/im-2023-005-change-1 3https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final- draft-formatted.pdf Figure 1. Alternative C overlaid on Pronghorn migration route and Sage Grouse Habitat.	The EIS provides information on the alternative development process in Chapter 2 (Proposed Action and Alternatives), including a description and rationale for alternatives that were considered but eliminated from detailed analysis. Information about the analysis of issues are provided in Chapter 3 (Affected Environment and Impacts). Impacts to pronghorn can be found in Section 3.18 (Wildlife); impacts to cultural sites, including Minidoka NHS and Wilson Butte Cave, can be found in Section 3.5 (Cultural Resources); impacts to greater sage-grouse can be found in Section 3.3.4, and impacts to visual resources can be found in Section 3.16 (Visual Resources). Also see response to comment 1042-2 (see in Table A-3ee, Alternatives).

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11634-7	Name Not Provided	In drafting the DEIS, an alternative that addressed concerns of the Japanese American community was briefly considered, but not fully investigated in the DEIS. The reasons for not including this alternative are arbitrary, and the DEIS is inadequate as a result. The Lava Ridge Wind Project will have significant affects to the Minidoka National Historic Site Japanese Internment Camp and subsequently, the Japanese American community. Public Law 109-441, "An Act to provide for the preservation of the historic confinement sites where Japanese Americans were detained during World War II, and for other purposes," was passed in an effort to preserve sites such as Minidoka, and this project is in opposition to the intent of Congress in passing Public Law 109-441 and in opposition of the legislation that created Minidoka National Historic Site. The intent of Congress to preserve Japanese Internment/Confinement Sites is further demonstrated in the recent passage (2023) of the Norman Y. Mineta Japanese American Confinement Education Act. This federal legislation reauthorizes the Japanese American Confinement Site (JACS) program to educate Americans on the incarceration of Japanese Americans during World War II. Given all this, the BLM should have fully investigated the Alternative intended to preserve the Minidoka National Historic Site and support the Japanese American community.	See response to comment 11455-2 (Table A-3ee, Alternatives).
11645-1	Berry Swinney	This project will cause unforseen damage to countless Idahoan family's and industry wildlife and our beautiful countryside for what so California can have more power, they do have wind and they need power build it where it's needed no sense running power lines thousands of mile when it can all be had right there at less cost and no destruction of Idaho.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11737-2	Jay Theiler	Alternative uses for the land such as cattle grazing that are sustainable and which provide more public benefits while minimizing the environmental impacts on public lands would be preferable.	See response to comment 1022-3 (see in Table A-3ee, Alternatives). Also, the EIS includes Section 3.9 evaluating the potential impacts to livestock grazing from the project.
11746-2	Bonnie Marshall	Let the Lava Ridge investors build the windmills in California, where the electricity will be used.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11779-2	Chris Cody, Betsy Merritt; National Trust for Historical Preservation	The National Trust also supports Alternative H, which was designed to completely avoid adverse effects to the Minidoka National Historic Site (“Minidoka”).3 The National Trust specifically requested the development of this alternative in our October 20, 2021 letter. Unfortunately, BLM’s analysis concluded that Alternative H would generate only 20% of the electricity compared to the applicant’s proposal, but would require the same amount of transmission infrastructure.4 Nonetheless, we continue to support it as an appropriate alternative given Minidoka’s extremely high level of historic significance and its status as a National Historic Site.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). See Section 2.9.4 for rationale for not analyzing Alternative H in detail.
11821-6	Laura Cunningham, Kevin Emmerich, WildLands Defense	Visual Resources buffers of at least 10 miles from new substations and transmission infrastructure should be considered to protect viewscapes for lands with wilderness characters, historic trails, national park units and state park units, and cultural landscapes important to Tribes. Variance Process	See response to comment 11455-2 (see in Table A-3ee, Alternatives). Also see Section 3.16 (Visual Resources) of the EIS.
11821-50	Laura Cunningham, Kevin Emmerich, WildLands Defense	BLM must consider the following alternatives and/or alternatives based on a combination of elements of: A distributed generation alternative; An energy conservation alternative; A degraded lands alternative; A private land alternative; [...] An alternative that would exclude all environmentally sensitive areas, Area of Critical Environmental Concerns (ACEC), Lands with Wilderness Characteristics, protection of ALL remaining areas with native shrub/tree vegetation cover present; all areas of habitat for Sage-grouse, Pygmy Rabbit, and sensitive and declining migratory birds like Sagebrush Sparrow, Loggerhead Shrike, and Pinyon Jay; areas of cultural and/or historical significance.	See responses to comments to 1022-3 (see in Table A-3ee, Alternatives) and 11598-7 (see in Table A-3ee, Alternatives).
11833-1	Bob Hassoldt	The statement in section 3.3.2, page 128: “There are no previous studies of a wind facility of the size proposed, nor have there been studies of any facilities with turbines as large as those proposed for the Lava Ridge Wind Project and it is unknown how these differences would affect avian fatalities during operation.”, when combined with this sentence in section 2.4, page 54: “The generation capacity of Alternative B would be nearly 25% more than the largest existing wind facility in the United States.”, indicate that the environmental evaluation of this project is in completely new territory. That being the case, the final EIS is going to require a higher degree of confidence to be scientifically valid. While we will never get perfect knowledge, a confidence level of 98% versus 95% would be an appropriate level to base any decisions on. If that can’t be achieved then the project should not be approved or severely scaled back to an even lower level than the Alternative D option.	A description of the project purpose and need is provided in Section 1.2 (Purpose and Need for the Project) in MVE (2023) and in Section 1.2 (Purpose and Need) of the EIS. Section 1.3 (Decision to be Made) in the EIS, also states the following: “This EIS provides the information and environmental analysis necessary to inform the BLM’s Authorized Officer and the public about the potential environmental impacts from the project. The BLM decision to be made will include • whether to grant, grant with modification, or deny a ROW to construct, operate and maintain, and decommission the proposed wind energy facility on public lands; • the most appropriate location for the project on public lands; and • the terms and conditions (stipulations) for the construction, operation and maintenance, and decommissioning of the wind energy facility on public lands that should be applied to the ROW.”
11849-3	Charles Brockway	No consideration was made of the land-use efficiency of wind farms as opposed to other established power generation technologies. Wind farms normally have total land requirements ranging from 40 to 80 acres per installed megawatt capacity, as opposed to coal, natural gas, and nuclear facilities at 12 to 13 acres per megawatt. But the proposed action has an incredible land use of 160 acres per megawatt or about 2.7 times the average for wind farms and 13 times the typical coal or nuclear plant land use requirement. If a similar calculation is made over the total life of the wind farm, the intermittent nature of wind makes the project even less viable: the land area per total megawatt-hour generated increases to about 20 times that of coal, natural gas, and nuclear. The BLM is charged with managing public lands in an optimal manner for multiple public uses. The proposed wind project should be rejected on its face as a grossly inefficient and wasteful use of public land resources. Approval of the proposed action would be contrary to the agency's legal obligation. The	See response to comment 1022-3 (see in Table A-3ee, Alternatives).

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		alternatives evaluated in the EIS are not actual alternatives - they are just slight variations on the same land-intensive, inefficient technology.	
11866-2	Jen Pierce	So where does that leave us? The 'no action' alternative is not acceptable, because we absolutely must reduce atmospheric carbon dioxide to ensure a healthy, functioning, and habitable planet for ourselves, our children, and our grandchildren. The other options (B,C, D, and E) are really not acceptable either because of the impacts on cultural and natural resources. (I believe there used to be an 'alternative H'? What happened to that alternative?) In particular, the cultural and historic significance of the original Minidoka camp acreage must be honored and considered.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). Alternative H is described in Section 2.9.4.
11871-1	WildLands Defense	EIS Table ES-2 does not lay out comparisons between alternatives in a fair and balanced manner. There is also no 'No Action alternative in this Table". It does not provide adequate and systematic alternatives element comparisons.	Table ES-2 is a summary comparison of the impacts of the action alternatives on the issues analyzed in the EIS. Alternative A (No Action alternative) is not compared in this table because there would be no project impacts as a result of denying the project and project development not occurring. Detailed information on the impacts of each alternative (including the No Action Alternative) for the issues analyzed is provided in Chapter 3 (Affected Environmental and Impacts). Section 3.1 (Introduction and Methodology) includes a description of the EIS analysis methodology.
11871-10	WildLands Defense	Table ES-2 contains imbalanced and vague, nebulous comparisons underlain by a significant lack of systematic baseline environmental and biological information and analysis (discussed below)– which is critical for developing and assessing alternatives and making legitimate comparisons among various alternatives. It is also critical for assessing how severe project harms will turn out to be, and for holding the wind developer to any claimed mitigation promises.	Table ES-2 provides a summary comparison of the issues analyzed in the EIS. Chapter 3 (Affected Environment and Impacts) provides information regarding the detailed analysis of each issue and action alternative. A description of the methodology is provided in Section 3.1 (Introduction and Methodology). Information regarding the roles and responsibilities of MVE and the BLM can be found in the Environmental Compliance Monitoring Plan (Appendix V in MVE [2023]) regarding environmental compliance.
11871-13	WildLands Defense	Why is there an "Alt. B with additional Measures"? Why isn't this laid out as a clear separate alternative? The alternatives are all fraught with tremendous uncertain - given the flaws in underlying data and EIS NEPA analysis. The biological reports, and NMPs ad supposed "mitigation" measures are filled with weasel words and "outs". The consultant report language related to an avian and bat and other documents is a prime example. It is impossible to adequately evaluate and compare alternatives without much more certainty certainty – not the uncertain wording regarding what would be considered as "additional measures"? The missing information must be developed as part of a new alternative in a SEIS process.	The EIS provides information regarding the alternative development process in Chapter 2 (Proposed Action and Alternatives). Table ES-2 provides and compares the impacts of the action alternatives on the issues analyzed in the EIS. Chapter 3 (Affected Environment and Impacts) provides information on the environmental issues analyzed in the EIS. Section 3.1(Introduction and Methodology) includes a description of the methodology used for this EIS analysis.
11871-19	WildLands Defense	Simplistic comparisons are made. Example: "Same as Alt. C but Alt. C avoids areas with higher sagebrush". Where is an adequate map? Aren't a significant number of sensitive species associated with non-sagebrush areas? Where are areas of recovering sage? Recovering rabbitbrush? Where is an alternative that avoids habitats of "grassland" sensitive species, too – as they appear to out-number the sagebrush sensitive species? Is one group being sacrificed for the other?	See response to comment 11871-13 (see in Table A-3ee, Alternatives).
11873-3	Mary Schwartz, Frank Schwartz	None of the action alternatives proposed provide an acceptable reduction in environmental impacts.	The EIS provides information on the alternative development process in Chapter 2 (Proposed Action and Alternatives), and an analysis of the impacts of the Proposed Action and alternative actions in Chapter 3 (Affected Environment and Impacts).
11886-11	Sandra Eto	According to the DEIS (Ch. 2.1, p. 2-1): A range of alternatives was developed and alternatives were carried forward for detailed analysis if they 1) met the BLM's purpose and need, 2) were technically and economically feasible, 3) addressed the substantive issues identified in scoping, 4) reduced potential adverse environmental effects or addressed resource conflicts when compared with the proponent's project, and 5) were consistent with management objectives outlined in BLM (1986), as amended. If Alternatives C, D, and E, which have been developed as reasonable alternatives that address substantive issues raised in scoping, reduce potential adverse environmental effects and address resource conflicts when compared with the proponent's proposed project, I question why BLM would consider approving an Alternative B that would not necessarily include the most comprehensive mitigation approach that the pared down alternatives are being held to? I would argue the proponent would benefit the most from this approach. Certainly, Alternative B would result in the most adverse impacts, especially to the environment, including the Minidoka NHS, which would adversely affect the survivors of the World War II Japanese American internment camps, their descendants, and the American people.	See response to comment 1042-2 (see in Table A-3ee, Alternatives)
11941-2	Helen Ogden, Wayne Ogden	To Lava Ridge, you should put them in CA. Or Nevada. Nevada has plenty of wind areas where no on lives close by.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
11942-2	Richard Ito	While not being an expert on EIS reports, I would have expected the appropriate place in the report to as fully as reasonably possible to address this concern would be in the "no build option" section although it actually belongs in each analyzed project possibility assumption. In addition but related, I would think it appropriate to further discuss alternative sites and alternative means other than the proposed rotating wing style mega towers.	See response to comment 1042-2 (see in Table A-3ee, Alternatives).
11949-2	Victor Yamada	Avoidance of Impacts – A revised Lava Ridge project should consider moving the wind towers away from the Minidoka National Historic Site (buffer zone) and using smaller turbines so that structures would not be visible at the Historic Site.	See response to comment 11455-2 (Table A-3ee, Alternatives).
11978-3	Magic Valley Energy, LLC	Section 2.8 BLM Alternatives Considered But Eliminated From Detailed Analysis 4. The DEIS states: "Two of the core siting requirements, wind resource quality and access to suitable transmission, reduce the feasibility	See response to comment 12859-18 (see in Table A-3ee, Alternatives).

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		of Alternative H compared to the Proposed Action and other action alternatives." a. MVE Comment: For clarity, the FEIS should state here that when compared to other action alternatives, Alternative H includes only those corridors furthest away from the proposed point of interconnection (Midpoint Substation or SWIP-N), and greatly restricts the number and maximum height of turbines that may be deployed, which substantially reduces the generation potential of the Project. However, the lengths of the transmission and collector lines required to support development of these furthest corridors would not be reduced proportionally with the reduced generation potential. Alternative H would require installation of comparatively long transmission line and collector line lengths to transport a much smaller amount of energy. The disproportion between the generation potential and transmission line length created under Alternative H would result in an increase in project costs on a dollars per megawatt delivered basis. Additionally, Project economics would be further degraded with the restriction to limit the turbine height to 545 feet, preventing deployment of the latest models of efficient turbine technologies. Taken together, these factors so severely affect the resulting cost of energy that they render Alternative H economically infeasible.	
11991-22	Julie Abo	I would support the creation of a new alternative or reviving of omitted alternatives, such as Alternative H that that resolves the problem that Alternatives B through E, "the federal undertaking could alter any of the characteristics that qualify the resource for the NRHP in a manner that would diminish the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5(a)(1))" directly and indirectly and in light of the increasingly negative cumulative effects with the mention of the two projects that are currently being planned to the East and West of Lava Ridge as mentioned in this DEIS. (page 3-144) However, I am still concerned that Alternative H does not meet the needs of the Native American Tribes and their concerns about the irreversible damage on cultural resources.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). The EIS provides information about Native American resources in Section 3.5.1 and in Section 3.6.1 (Environmental Justice Communities).
12054-4	Kevin Emmerich	The BLM is also reviewing a new rule that would emphasize and recognize Conservation as a land use.3 Under the proposed rule, the BLM would elevate conservation to be on equal footing with other permitted uses for federal land — such as mining, green energy, grazing, or oil and gas permitting — that have historically taken precedence. It defines conservation as pertaining to both the protection and restoration of public lands. The proposed rule would also amend the existing Area of Critical Environmental Concern (ACEC) regulations to better ensure that the BLM is meeting FLPMA's command to give priority to the designation and protection of ACECs. The proposed regulatory changes would emphasize ACECs as the principal designation for protecting important natural, cultural, and scenic resources, and establish a more comprehensive framework for the BLM to identify, evaluate, and consider special management attention for ACECs in land use planning. ACECs are areas where special management attention is needed to protect important historic, cultural, and scenic values, fish, or wildlife resources, or other natural systems or processes, or to protect human life and safety from natural hazards. The proposed rule clarifies and expands existing ACEC regulations to better ensure that the BLM is meeting FLPMA's command to give priority to the designation and protection of these important areas. These proposed regulatory changes support and enhance BLM's protection of intact landscapes through ACEC designation and better leverage this statutory tool for ecosystem resilience. To implement FLPMA's direction to "give priority to the designation and protection of areas of critical environmental concern," the BLM follows regulatory requirements found at 43 CFR 1610.7-2 and policy instruction found in Manual Section 1613. The BLM currently inventories, evaluates, and designates ACECs requiring special management direction as part of the land use planning process. The BLM's land use planning process guides BLM resource management decisions in a manner that allows the BLM to respond to issues and to consider trade-offs among environmental, social, and economic values. Further, the planning process requires coordination, cooperation, and consultation, and provides other opportunities for public involvement that can foster relationships, build trust, and result in durable decision making. As part of this rulemaking, the BLM proposes establishing procedures that require consideration of ecosystem resilience, landscape-level needs, and rapidly changing landscape conditions in designating and managing ACECs. The BLM may also revise the ACEC manual and develop an ACEC handbook to integrate the existing rule as well as the changes proposed in this rulemaking, if finalized, into policy. The BLM would thus provide additional guidance for how to incorporate ACECs into resource management decisions in a way that considers trade-offs among environmental, social, and economic values during land use planning. The Friends of Minidoka have recently submitted a nomination for an Area of Critical Environmental Concern that is intended to be considered as an alternative to the proposed wind project. While it is not considered in the DEIS, it should be added. The role of the Purpose and Need Statement is to define the range of alternative so we want to see more conservation measure in the statement.	Designation of an ACEC is outside the scope of this EIS, the purpose and need of which is to respond to MVE's application. Changing the purpose and need of this EIS would not respond to the application the BLM has received. The BLM can receive and consider ACEC proposals at any time, but any designation would take place outside of this EIS. The draft Conservation Rule is not in place yet and may be revised based on the ongoing public comment period. If an organization wanted to apply for a conservation easement under the new rule, it would have to wait for the rule to be finalized. Changing the purpose and need of this EIS based on a draft rule would not be appropriate.
12054-5	Kevin Emmerich	Alternatives: The DEIS does not recognize or list a full range of reasonable alternatives. The NEPA directs the BLM to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources;..." (NEPA Sec102(2)(E)). We appreciate that the BLM has chosen two smaller alternatives as their preferred alternatives, but even the smallest footprint alternative would still develop 122,444 acres! It would also place 244 turbines, over 700 feet tall trough out the view-scape. Alternative E would still be visible from the Minidoka National Historic Site, kill over 8,000 bats per year, 10,000 birds per year, 8 golden eagles per year, would lose 560 acres of sage grouse and pygmy rabbit habitat, and impact pronghorn migration.	The EIS provides information regarding the alternative development process in Chapter 2 (Proposed Action and Alternatives). Section 2.8 (Preferred Alternative) provides further details and rational regarding alternatives the agency considered but which were eliminated from detailed analysis. The BLM has prepared a full and detailed analysis with robust public participation with the NEPA process supporting requirements for a hard look in BLM decision-making.
12054-8	Kevin Emmerich	Under NEPA, BLM is required to consider alternatives "outside of the jurisdiction of the lead agency."	The BLM will consider all alternatives and options included in the EIS and consistent with NEPA review requirements.

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		The Environmental Protection Agency has identified 15 million acres of brownfield in the USA that would be suitable for renewable energy.4 The BLM can't direct a developer onto private lands but can choose a No Action Alternative based on numbers for distributed energy.	
12130-1	Brenda Pace	I am concerned that the BLM was not provided with detailed information on specific turbines and their output potential for use in designing alternatives ("Site-specific data for wind variability within the project area were not available to the BLM" DEIS pg 2-17). Turbine-specific information is essential to support decisions about micro-siting to avoid/reduce impacts to resources that occupy specific locations. The generalized "turbine array" information that was available to BLM prevented the development of alternatives for project footprints that would have been truly responsive to the distribution of sensitive resources by preventing the consideration of smaller groupings of turbines in the development of alternatives. Instead, all proposed alternatives include long ½ mile-wide areas of potential disturbance that dissect the entire area and affect habitat connectivity no matter which alternative is chosen. I understand that some of this wind resource information is proprietary and would present a risk of loss to Magic Valley Energy (MVE) if released to the public, which might include other companies that may want to develop their own wind projects in the same area. However, it should have been provided to the BLM and since it wasn't, the NEPA analysis is significantly less nuanced in the development of unique alternatives. It surely could have been possible to trust the BLM with this information, while restricting its distribution to the public at large.	See response to comment 1042-24 (see in Table A-3ee, Alternatives).
12130-2	Brenda Pace	I recommend that BLM consider if another alternative that is based on specific turbine locations, possibly in smaller and more widely spaced concentrations, rather than in multiple, long ½ mile-wide strings, would offer greater flexibility in micro siting project components and reducing impacts.	See response to comment 1042-24 (see in Table A-3ee, Alternatives).
12136-2	Diane Honda	Page 3-156 under 3.5 Cultural Resources of the Draft Environmental Impact Statement (DEIS) states: "The openness and undeveloped landscape are vital to the historic character and purpose of Minidoka NHS. These defining characteristics—expansiveness, remoteness, high desert, and agrarian terrain—convey the government's site criteria and the long-lasting effects of that intentional decision-making process." (BLM 2022) While various sections of the DEIS cite the impact of the proposed Lava Wind Project on the Minidoka National Historic Site (NHS), aside from Alternative A, none of the proposed DEIS Alternatives protect the land surrounding the Minidoka NHS from changes that will impact Minidoka NHS's purpose. The "least-worst" impact cited is 'A "moderate" degree of visual change to Minidoka NHS's viewshed'. That change would make it difficult, if not impossible for the Minidoka NHS to offer its visitors an immersive experience akin to what its prisoners endured. This experiential component must be preserved so visitors can absorb Minidoka NHS's energy, learn what happened there, and heal. The DEIS should be expanded to include how Minidoka NHS's sense of place can be preserved if this project as well as other proposed projects in the area are permitted to proceed.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). Also, a new section and analysis was added to the EIS, Section 3.19: "How would the impacts identified within the draft EIS affect the NPS interpretive purpose of Minidoka NHS?" Section 3.19 discusses how project visual impacts could potentially change the Minidoka NHS visitor experience (Section 3.16, Visual Resources).
12225-2	Sarah Halvorson	Locating this project in California or Nevada closer to its intended destination greatly minimizes this cost and risks.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
12365-2	Jerry Davis	hope you will reconsider a greatly scaled down proposal, carefully planned to minimize wildlife impacts.	The EIS addressed environmental analysis in Chapter 3 (Affected Environment and Impacts). The following environmental considerations are addressed in this chapter: air quality, avian and bat species, climate and greenhouse gases, cultural resources, environmental justice and socioeconomics, fire and fuels management, land use and realty, livestock grazing, paleontological resources, pollinators and insects, recreation, soils, transportation, vegetation, visual resources, water and wetland resources, and wildlife. The EIS provides information on impacts on wildlife specifically in Sections 3.18.1.2, 3.18.3.2, and 3.18.4.2. Alternatives and the alternatives development process are covered in detail in EIS Chapter 2 (Proposed Action and Alternatives). The size of the project area and siting corridors, as well as the number of turbines, are shown in Table 2.4-1.
12370-1	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	We acknowledge our "alternative" reference to Alternative E but, as we stated in our comments, such reference remains subject to the "modifications … as discussed in more detail" in our comments dated April 14, 2023. We wish to be clear that the "modifications … as discussed in more detail" in our comments dated April 14, 2023, implicate a significantly smaller footprint than that stated in Alternative E, and likely outside of the Star Lake Allotment.	The EIS provides information regarding Alternatives in Chapter 2 (Proposed Action and Alternatives).
12398-4	Environmental Protection Agency	• Specific to the disproportionate cultural impacts of the proposed project on Japanese American community at the Minidoka War Relocation Center and Minidoka National Historic Site: further evaluate Alternative H, eliminated from the detailed analysis, which has the potential to avoid anticipated major visual effects that result in disproportional cultural impacts. EPA notes that although Alternative E will minimize impacts, major impacts to cultural resources will remain, even after application of mitigation measures.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). As described in Section 2.9.4 (Alternative H), Alternative H does not meet the purpose and need of the project.
12859-18	Kristen Brengel, Robyn Achilles; Friends of Minidoka	2.8 BLM Alternatives Considered but Eliminated from Detailed Analysis In the letter sent to BLM on July 8, 2022, Japanese American organizations and partners asked BLM to "develop and analyze an additional alternative in the draft EIS that would avoid any adverse impacts on the Minidoka Relocation Center and Minidoka NHS."154 While we were pleased that BLM developed Alternative H, BLM's finding that Alternative H	See response to comment 11455-2 (see in Table A-3ee, Alternatives). The BLM added to Section 2.9.4 more explanation and information sources for why Alternative H would be economically infeasible. BLM reviewed publicly available wind speed data for the project area from NREL and the Global Wind Atlas (Argonne National Laboratory 2023; Davis et al. 2023). BLM prepared simulations for 17 key observation points (KOPs)

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		was not economically feasible and therefore not considered as an alternative is based on inadequate information.155 CEQ regulations require BLM to analyze "a reasonable range of alternatives that are technically and economically feasible."156 BLM's feasibility conclusion was based on unsupported reasoning and analysis regarding both wind speed and transmission availability and costs. In considering Alternative H, the BLM states that a combination of poor wind quality and distance from the Mid-Point Substation and SWIP-N line makes Alternative H infeasible. BLM's Alternative H is based on siting corridors with 84 3 MW turbines (545 feet). In terms of wind quality, BLM did not review "[s]ite-specific data for wind variability within the project area." It based its feasibility analysis on a general understanding "that the wind resource varies with topographic features and associated changes in elevation …" BLM later states that some of the turbine locations "would be located in areas assumed to have a lower quality wind resource …" However, BLM does not base this analysis on detailed wind speed information that the company presumably could provide to BLM to support its analysis. A cursory review of Alternative H shows similar wind resources to other parts of the project area. A portion of Alternative H is in the vicinity of Kimama and Sid Buttes, high points in the project area, with a higher base elevation and better wind speeds. The NREL's Wind Supply Curve Interactive map shows that the area proposed for Alternative H has an average capacity of 287 (MW) and wind speeds between 6.55 and 6.92 miles per hour, which are similar to the overall Lava Ridge project area.157 Also, the Global Wind Atlas shows that the area proposed for Alternative H has wind resources that are similar to the rest of the project area.158 Based on the NREL and Global Wind Atlas interactive maps, the wind quality in Alternative H appears similar to wind quality throughout the project area.159 The NREL nationwide wind speed maps show higher wind speeds at higher elevations. In terms of BLM's dynamic visual simulations, posted on its E Planning web-site, BLM's simulations feature 3 MW turbines to minimize the visual impacts.160 However, in its discussion of Alternative H, it says that the wind quality for 3 MW turbines "has less potential for generating electricity … [and] lower wind potential."161 The BLM also cited the lack of "access to suitable transmission" and the need to build 19 miles of new 500 kV transmission line as another reason to find that Alternative H is not economically feasible. However, as noted by BLM in its 2023 "Energy Overview Map,"162 Alternative H is either bisected by or immediately adjacent to several existing and permitted power lines located between the Borah and Midpoint substations including: • Kinport to Midpoint existing 345 kV power line (bisecting Alternative H) • Midpoint to Adelaide existing 345 kV power line (located in the 2009 WEC 49-112 corridor.)163 • Midpoint to Borah existing 345 kV power line.164 • Midpoint to Valmy existing 345 KV power line (located within WEC Corridor 112-226).165 • Gateway West permitted 500 kV power line (Borah-to-Midpoint bisecting of Alt. H) (upgrade of existing Kinport to Midpoint line to 500 kv)166 • Westwide Energy Corridor (WEC) – Segment 49-112 o 2009 WEC corridor (immediately south of Alternative H, Midpoint to Adelaide.)167 o Proposed 2022 realignment along Gateway West corridor (which bisects Alt. H) 168 • Borah-to-Hunt, existing 203kV power line While Idaho Power identified transmission constraints west of Midpoint, between the Magic Valley and Boise,169 Idaho Power's 2021 Integrated Resource Plan (IRP) did not identify any transmission constraints between Borah and Midpoint (where Alternative H would interconnect). According to Magic Valley Energy, it has executed a Large Generator Interconnection Agreement with Idaho Power Company. BLM makes an assumption that Alternative H needs to connect to the Midpoint Substation or SWIP-N and that LS Power would need to build an additional 19 miles of 500 kV power line which would increase the cost of Alternative H. However, Alternative H has ample existing and planned transmission, as pointed out by LS Power's own Plan of Development, in and around Alternative H. The FEIS should address whether an interconnection to the existing or planned transmission closer to Alternative H is technically feasible and if so, if it would change BLM's conclusions about the economic viability of Alternative H. BLM also states that because Alternative H would provide 252 MW, or only 20 percent of the electricity generation it is economically infeasible. Because of the large size of the Plan of Development (POD) and its associated unacceptable impacts, this 20% reasoning is also flawed. The DEIS should consider the absolute size of Alternative H, not its relation to the original POD. Idaho has several wind projects of this size currently operating in Idaho including: • Burley – 34 turbines generating 51 MW. • American Falls – 44 turbines generating 79 MW • Mountain Home – 80 turbines generating 180 MW. Also, a project that is 20% of the original POD would have lower cost to build and operate. We recommend that the BLM reexamine whether the Alternative H is economically viable or if it is needed to help LS Power secure its financing to construct the SWIP-N line which is connected to the Lava Ridge project.	for a range of turbine sizes, 3-MW and 6-MW for Alternatives B, C, D, and E, and 5-MW for the Preferred Alternative. Select visual simulations are available in EIS Appendix 5; all simulations prepared for the project are available in Appendix C of the Visual Resources Technical Report (SWCA 2024).
12934-3	Rob Thornberry, Theodore Roosevelt Conservation Partnership	TRCP asks the BLM to consider the following changes and additions to the DEIS: ... Provide a true conservation alternative. Despite the known concerns around the effects of industrial wind farming on pronghorn behavior, all four of the action alternatives develop infrastructure in a known migration route. The TRCP suggests building an alternative that avoids all intrusion on the known Owinza pronghorn migration route. An example of an alternative that accounts for migration projections can be found in Figure 2.8-1 in the Executive Summary. The table lists alternatives considered by BLM but eliminated from detailed analysis.	The EIS provides information regarding the alternative development process in Chapter 2 (Proposed Action and Alternatives). Information on the impacts to pronghorn is included in Section 3.18.1 (Wildlife Movement [non-game mammals and reptiles]) and Section 3.18.2 (Big Game Habitats and Populations).
12985-2	Jerry Heimerdinger	I am experiencing difficulty coming up with reasonable alternatives to MVE's proposal specifically. Drastically reducing the magnitude of the project's size would be an idea. Fifty to one hundred turbines? If the project were approved with modifications, it could be a model for future projects elsewhere. Substantially scaled down, extremely high and enforced rehabilitation of the ravaged ecosystem, and stringent and forceful decommissioning of any kind would make these types of projects more feasible.	The EIS provides information regarding the alternative development process in Chapter 2 (Proposed Action and Alternatives). A comparison of the turbine numbers and sizes for each alternative is provided in Table 2.4-1. Information regarding proposed mitigation, including applicant-committed measures, BLM-required measures, and additional project-specific mitigation can be found in EIS Appendix 4 (Mitigation). The project Decommissioning Plan is provided in Appendix L in MVE (2023). The BLM will consider each alternative and option analyzed in the EIS.

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12986-2	Victor Yamada	Avoidance of Impacts - A revised Lava Ridge project should consider moving the wind towers away from the Minidoka National Historic Site (buffer zone) and using smaller turbines so that structures would not be visible at the Historic Site.	See response to comment 11455-2 (see in Table A-3ee, Alternatives).
13006-12	Leon Smith	3) Recommend that BLM's action alternatives avoid or minimizes impacts to both sage grouse habitat and the Owinza pronghorn migration route. There is no existing alternative that avoids the pronghorn migration route. Action alternatives should not include siting corridors in migration routes.	The EIS provides information about impacts to greater sage-grouse in Section 3.3.4, and pronghorn in Section 3.18.2, including analysis of each alternative on the species. information regarding the alternative development process is provided in Chapter 2 (Proposed Action and Alternatives).
1311-2	David Mollineaux	I am concerned about this project. If all the energy generated from this project goes to California and Nevada, then why not build it in those states. Why should we have the impact here?	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
165-2	Ash Marshall	I encourage you to approve Alternative C. Alternative C reduces the impacts to and still allows a good amount of turbines to produce clean, renewable energy for Idaho, our neighboring states, and most importantly, our children. Wind energy nets zero greenhouse gasses and uses a resource that is unlimited. The maintenance for a wind turbine is minimal, especially when considering that it generates power from a resource that we will never run out of. To me, the biggest environmental consideration is how much water this project would need, as 70% of Idaho is in some stage of drought right now, even after the heavy snowfall recently.	The BLM will consider all alternatives and relevant options analyzed in the EIS. Impacts of each alternative are discussed in Chapter 3 (Affected Environment and Impacts), including air quality, climate and GHGs, water and wetland resources, and wildlife. Information about the project operation and maintenance is provided in Section 4.0 (Operations and Maintenance) in MVE (2023).
2825-1	Keith Dunbar	Support of alternative "E", with modification. Remove most westerly line of turbines closest to the historic footprint of the internment camp.	The BLM will consider all alternatives and relevant options analyzed in the EIS. See response to comment 11455-2 (see in Table A-3ee, Alternatives) regarding impacts to Minidoka NHS.
3062-1	Kate Lopez	There are other public lands where blasting into bedrock can be avoided. Why not select another site, or amend the management use plan to eliminate this area from "renewable" use potential?	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
3227-1	Mark Schneider	I do prefer that the wind turbines be of the smaller design and not the larger type.	See response to comment 1042-2 (see in Table A-3ee, Alternatives).
3369-2	LuAnn Craner	There are better options: a) Wind Panels - no blades, b) Aeromine Tech have 50% more energy than solar using 10% of space. c) Power Nest wind turbines and solar together on rooftops in cities. d) AIR FOILS - no external moving parts, air foils have no problems with bad weather, can use wind as low as 5 mph. e) also vertical Induced Vibration Resonant wind generators, and IceWind windmills.	See response to comment 3715-1 (see in Table A-3ee, Alternatives).
3575-1	Sue Page	Suggestions Move to areas that do not impact the towns, cities, historical sites or aquifer around the turbines. 1. Wells, NV along Hwy 80. This area has as much wind, easier access to move transmission lines south towards the end users Las Vegas and California. 2. Replace and rebuild abandoned wind turbines already in California in Palm Springs, Indio, Bakersfield to name a few. 3. Build in California at Eagle Mountain, Imperial Sand Dunes, Lake Crowley or Mono Lake to name a few locations. Stop Lava Ridge Wind and all alternative suggestions.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
3715-1	No Name Provided	I vote NO on Lava Ridge Wind Project. 1) There are better options: a) Wind Panels - no blades, b) Aeromine Tech have 50% more energy than solar using 10% of space. c) Power Nest wind turbines and solar together on roof tops in cities. d) AIR FOILS - no external moving parts, air foils have no problems with bad weather, can use wind as low as 5 mph. e) also vertical Induced Vibration Resonant wind generators, and IceWind windmills.	See response to comment 1042-2 (see in Table A-3ee, Alternatives) regarding turbine design. Alternative generation technology and locations do not meet the purpose and need of this project (see response to comment 1022-3 in Table A-3ee, Alternatives).
39-1	Colten Michael	I'd like to start by saying that I appreciate that this project is under consideration for construction in Idaho. New energy resources are needed to meet increasing demand, and I'd rather have the resources sourced in Idaho so that our utility payments go to companies and employees in the local community. With that said, I'd like to advocate for alternative B or C. I believe that the larger scale of this project, here and now, is needed to meet energy demand in Idaho and beyond. However, given the state of supply chains in the electric utility industry and the concerns of fellow Idahoans about the large footprint (especially near the Minidoka Historic Site), I think that a phased project could be best. Perhaps the BLM could approve the right of way for alternatives B or C but construction would begin only on the footprint of alternative E and could not proceed to the expanded footprint until 80% or so of construction is done on footprint E. This could allow use to continue in its current state at the footprints of alternatives B and C that are not included in E until the project is nearly complete, which could potentially limit friction between the project and local stakeholders. Thanks for all of your work on this project so far.	The BLM considers each alternative when evaluating the project purpose and need. Information about project construction and site plans are included in MVE (2023). The EIS provides information on the alternatives and alternative development in Chapter 2 (Proposed Action and Alternatives). See response to comment 11455-2 (see in Table A-3ee, Alternatives) regarding the impacts to Minidoka NHS.
3990-3	Diana Nielson	4. Where technically and financially feasible, bury distribution powerlines and communication lines within existing disturbance. 5. Place infrastructure in already disturbed locations where the habitat has not been fully restored. 6. Co-locate linear facilities within one mile of existing linear facilities.	Information regarding construction and development are provided in MVE (2023) and include details about electrical infrastructure and transmission system interconnection. The EIS includes information about project components in Appendix 11 (Project Elements Common to All Action Alternatives).
4057-1	Dean Dimond	I am opposed to Lava Ridge In reviewing the DEIS It is clear that the Alternate A option was never developed? Every project should have a pro and con list for all options. Were is that list for any of the options in the DEIS?	See response to comment 9275-5 (see in Table A-3ee, Alternatives).

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		Part of the BLMs job is to protect the land for future generations. Why didn't you analyze what the shape the wildlife, land, aquifer, etc…. will be in 5, 10, 20, 30,40 and even 50 years for each option? Were is any analyzation for alt A? While the DEIS is a long a complicated document their has been a lot of "copy and paste" used. and again you totally skipped Alt. A. The BLM needs to go back and analyze what shape the ground is in now and identify what measure could be taken in the future to IMPOVE the area and how the proposed windmills would conflict with any future uses. Their are a lot of pro's to Alt. A. The BLM must consider them. Please complete this study	
4220-5	Sue Page	You want suggestions? Let California create their own energy. Put turbines in the Mojave Desert, around Eagle Mountain, Mono and Crowley Lakes. (Pictures attached)	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
4220-6	Sue Page	Or better yet join the Alnshultz Wind Farm project in Wyoming. It's all on private property.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
5978-1	Jeff Roper	It is unfortunate that the BLM planners didn't understand that preserving the view from the Minidoka National Historical Site was important—perhaps the project can be altered to move the windmills at least 10 miles away.	See response to comment 11455-2 (see in Table A-3ee, Alternatives).
6350-1	Linda Olson	Wind turbines over 84,000 acres that will be 700 feet tall for California power should be in California. There are thousands of desert land there where nothing would be disrupted.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
6849-3	Name Not Provided	California has ample public land, let them sacrifice their own land, for this project	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
7356-2	Elaine French	But I greatly favor installing the fewest number of wind turbines of the lowest effective height on a smaller amount of land. I would like the project to impact as little as possible the view shed and wildlife habitat and corridors in the area.	See response to comment 1042-2 (see in Table A-3ee, Alternatives). Table 2.4-1 provides information on the alternatives considered and the project components of each alternative. the information includes details regarding the number and type of wind turbine and various information about the project area (e.g., total area, ground disturbance, siting corridors). Visual and wildlife resource impact information for each alternative is provided in the Affected Environment and Impacts sections in Sections 3.16 (Visual Resources) and 3.18 (Wildlife).
8324-1	Curtis Wolthuis	I understand from the Executive Summary and other News reports that the BLM is actually looking to find alternative wind turbines or products that are much less intrusive to the visual sight lines and ambiance of the area in which the project could be potentially located. I am aware of low profile smaller wind turbines that should be considered as an alternative for this project.	See response to comment 1042-2 (see in Table A-3ee, Alternatives).
8338-1	Kim Hanks	I hope the wind project will consider the "tulip" style turbines that are non lethal to wildlife	See response to comment 1042-2 (see in Table A-3ee, Alternatives).
8420-2	Sue Page	Let this project be built were the end user has better accessible. There is plenty of open land in both Nevada and California to be used.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
8435-2	Gary Smith	If the goal is truly to increase Clean Reusable Energy for the West Coast Power Grid, then BLM and all parties concerned should be to reuse all the wind turbines that have been abandoned. In my opinion it makes more sense to reuse the land and infrastructure in California wind farms. There are estimates of over 10,000 abandoned wind turbines and the wind farms in Southern California.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
8458-8	Sue Page	Put turbines in the Mojave Desert, around Eagle Mountain, Mono and Crowley Lakes.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
8458-10	Sue Page	Or better yet join the Alnshultz Wind Farm project in Wyoming. It's all on private property.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
8829-2	George Snyder	Also, there is talk of the power going to other more power hungry states. I can't speak to the available lands in in many other states, but I do know about California. From the Navada and California border going north on interstate 15 there is hundreds of square miles of land that isn't used for anything that could be used for such a project.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
9080-35	The Coalition to Protect America's National Parks	A. Section 2.1 Alternatives Development Process (p. 2-1) – As described in the DEIS, "[a] range of alternatives was developed and alternatives were carried forward for detailed analysis if they: 1) met the BLM's purpose and need, 2) were technically and economically feasible, 3) addressed the substantive issues identified in scoping, 4) reduced potential adverse environmental effects or addressed resource conflicts when compared with the proponent's project, and 5) were consistent with management objectives outlined in BLM (1986), as amended." Our concern with the range of action alternatives considered is that none would successfully avoid substantial adverse effects to visual resources as seen from the perspective of Minidoka NHS, the WRC, and Native American cultural sites such as Wilson Butte Cave, regardless of whatever "mitigation measures" BLM proposes to try to lessen the relative severity of those impacts. In our scoping comments, we had recommended that BLM consider at least one action alternative in a location with adequate wind energy potential but outside of the current Project area in order to avoid conflicts with the sites mentioned above. However, it appears that BLM has not fully considered such an alternative.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). As discussed in EIS Section 2.3 (Project Elements Common to All Action Alternatives), action alternatives have been developed with the intent to avoid and minimize potential impacts to Wilson Butte Cave, Minidoka NHS, and the communities that have connections to these places, as well as accounting for other resource concerns (see Table ES-2 for a comparison of potential impacts from each action alternative).
9080-40	The Coalition to Protect America's National Parks	F. Section 2.8.4 Alternative H (pp. 2-16 and 2-17) – As described under Alternatives Considered but Eliminated, "Alternative H was considered in order to examine an alternative that eliminates potential impacts to the visual landscape surrounding the Minidoka NHS. Alternative H considered a project layout that would only include turbine siting corridors not potentially visible from the Minidoka NHS (see Figure 2.8-1)." (Emphasis added) However, BLM dismissed this alternative from further consideration because "[t]wo of the core siting requirements, wind resource quality and access to suitable transmission, reduce the feasibility of	See response to comments 11455-2 and 12859-18 (see in Table A-3ee, Alternatives).

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		Alternative H compared to the Proposed Action and other action alternatives." BLM's decision to limit ALL of the action alternatives to the same location within close proximity of Minidoka NHS, the WRC, and Wilson Butte Cave has created an irreconcilable conflict between managing for appropriate energy development under FLMPA and conserving scenic and cultural resources and values, which is also mandated by FLMPA. As a result, the range of action alternatives presented in the DEIS is merely a list of relatively bad options that vary in the level of adverse effects they would cause. Alternative A (No Action) is the only alternative considered that would actually avoid substantial adverse effects to the cultural landscape surrounding and encompassing these sites.	
9275-2	AJ Whitecotton	In reviewing the Lava Ridge Wind Project Draft Environmental Impact Statement, I noticed that you only offered the public options B, C, D and E. Yet Option A, which is to do nothing at all was missing from your charts. I believe that this was misleading to the public and it needs to be corrected and a new comment review period with better explanation that the public could have picked or selected Option A for the BLM to do nothing and deny the project.	See response to comment 9275-5 (see in Table A-3ee, Alternatives).
9275-5	AJ Whitecotton	Lastly, I find only B, C, and D, in your proposal, where is option A that no wind tower's be built in this area.	Alternative A (No Action) is addressed in the EIS. Chapter 2 (Proposed Action and Alternatives) provides details on alternative development and describes the No Action Alternative in Section 2.2. Details about how the alternatives were developed is provided in Section 2.1 (Alternatives Development Process). The impacts of Alternative A are explored in each section of Chapter 3 (Affected Environment and Impacts). Table ES-2 summarizes and compares the impacts of action alternatives on the issues analyzed in the EIS. Also see response to comment 11535-7 (see in Table A-3ee, Alternatives).
9657-6	Saiyare Refaei	I ask that you reconsider an alternative location for this project because as it stands the leading Alternatives C and E still will impose on the immersive feeling and impact of the ambiance of the Minidoka National Historic Site that is critical in the educational aspect of the experience.	See response to comment 11455-2 (see in Table A-3ee, Alternatives). The BLM also added EIS Section 3.19 evaluating potential project impacts to the NPS interpretive purpose at Minidoka NHS.

Consultation and Coordination

Table A-3ff. Consultation and Coordination

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11535-99	Steven Andersen	The GPS interference caused by industrial wind turbines is also a threat to national security. As a result, the Department of Defense ("DOD") Siting Clearinghouse works with developers to address risks to national security during development. However, there is no discussion or mention that MVE ever consulted with the DOD, received feedback on national security risks, evaluated any potential mitigation measures, let alone received a green light.	See MVE (2023) Section 5.2.1 (Aviation and/or Military Considerations).: "The FAA/Department of Defense Preliminary Screening tool was used to determine potential FAA permitting processes for the Project area. The Long Range Radar screening tool indicates the Target Area is in a green zone, which signifies there are no anticipated impacts to Air Defense and Homeland Security radars… The preliminary review of the Military Operations screening tool did not return any likely impacts to military airspace. MVE will continue coordinating with the agencies listed above to ensure they are informed as design of the Project is refined." Entities seeking to develop a wind energy project on BLM public lands, in conjunction with BLM Washington Office and Field Office staff, shall consult with the U.S. Department of Defense regarding the location of wind power projects and turbine siting as early in the planning process as appropriate. This consultation shall occur concurrently at both the installation/field level and the Pentagon/BLM Washington Office level. An interagency protocol agreement is being developed to establish a consultation process and to identify the scope of issues for consultation (BLM 2012). Bureau of Land Management (BLM). 2012. Appendix C: BLM Wind Energy Development Program Policies and BMPs. In *Searchlight Wind Energy Project FEIS*. Available at: https://www.energy.gov/sites/default/files/EIS-0413-FEIS_Appendix%20C_BLM%20Wind%20Energy%20BMPs.pdf. Accessed December 28, 2023.
11535-104	Steven Andersen	The Executive Director of the Southern Idaho Regional Communications Center (SIRCOMM) submitted scoping expressing serious concerns regarding risk that the Project could interfere with radio transmission and reception pathways near Nietrich Butte; interference with transmission and reception pathways between Dietrich, Hansen and Gooding Tower Sites; interference with the transmission and reception pathways between Dietrich Butte and Skeleton Butte; and interference with the transmission and reception pathways caused by equipment utilized for construction and interfere with a comprehensive upgrade to the telecommunication system in the area.323 As such SIRCOMM asked for continued updates and involvement,324 which never happened.	See EIS Section 3.8.1.1.4 (Land Use and Realty, Communication Sites). This section of the draft EIS states that "additional details concerning existing communication systems in the analysis area were identified through scoping" and summarizes these concerns related to radio transmission and reception pathways. This section additionally states that "MVE's coordination with communication providers and operators is ongoing to identify specific sites and pathways of concern in the analysis area," and provides assessment of the impact of wind turbines on communication sites. Results of this assessment indicate that the impact of wind turbines on communication services is consistently low and the frequency of the operation for these services would allow the signal to propagate through the wind turbines. "Per MVE's applicant-committed measures 27 and 28, MVE would design the project to minimize interference with communication systems and work with system users to resolve any issues; measures to reduce interference may include the use of Comsearch's recommended setbacks from land mobile fixed-base stations (254 feet) or other design modifications such as attaching communications equipment to project infrastructure or to existing communications structures in the analysis area. Signal studies were provided in April 2021 to all communication site authorization holders who had submitted responses to the BLM following notification provided in July 2020. Prior to final design and siting of project infrastructure, MVE would complete a line-of-sight interference study to further identify communication

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			pathways potentially blocked by the project's proposed infrastructure and to determine where potential impacts to existing communication towers can either be avoided through micro-siting of infrastructure or mitigated. Coordination with local communication providers and operators is considered ongoing."
11585-4	Preservation Idaho	Both the Shoshone-Bannock and the Shoshone-Paiute Tribes have voiced their significant concerns about the loss of artifacts and history. Disturbance and destruction of these lands and the history and sites that they contain is nothing short of disrespectful and negligent. Federal policy such as the 1966 National Historic Preservation Act requires and allows consideration of these concerns and mandates that preservation of this heritage is in the public interest.	Native American concerns are addressed in Section 3.5 (Cultural Resources). See response to comment 6900-1 (see in Table A-3ff, Consultation and Coordination) regarding the BLM's consideration of input received throughout the NEPA and NHPA Section 106 processes, (including from government-to-government consultation with Tribes) in their alternatives development and decision-making processes.
11640-4	Amber Madsen	How many animals, endangered or otherwise, have to die? Not even one is acceptable. An individual citizen would be imprisoned, why is it acceptable for a corporation to injure or kill any?	See EIS Sections 3.3 (Avian and Bat Species), 3.11 (Pollinators), and 3.18 (Wildlife), which summarize project impacts to animals; and EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), Consultation and Coordination, Cooperating Agencies, U.S. Fish and Wildlife Service section. The USFWS section of EIS Appendix 10 discusses the statutory responsibility of the USFWS related to MBTA, ESA, and BGEPA implementation, and states that each of these statutes applies to MVE's permit request. The USFWS provided input regarding 1) the risk of incidental take of eagles from turbine operations; 2) avoidance and minimization measures, compensatory mitigation, and fatality monitoring related to incidental eagle take from turbine operations; and 3) project impacts to migratory birds, bats, endangered species, and critical habitat, and options for addressing those impacts. The USFWS intends to use this information in decision-making for a BGEPA eagle take permit application submitted by MVE on July 28, 2021, and in meeting other USFWS statutory obligations. Coordination with the USFWS on the above matters is ongoing. Per EIS Appendix 10, Mitigation Framework, Types of Mitigation section, the USFWS will issue their own NEPA document to facilitate their decision regarding the project's BGEPA eagle take permit application submitted by MVE on July 28, 2021. This document may include additional mitigations should USFWS find they are warranted after completing their own NEPA analysis.
11862-1	Suzanne K. Ishii-Regan	Given the significant relationship of the Indigenous People of Alaska to the WWII Japanese Internment, and its cultural impact, I respectfully urge that the Alaska Native tribes and corporations be included in the discussion of the proposed Lava Ridge Wind Farm Project.	See response to comment 11315-3 (see in Table A-3gg, Cumulative Effects).
11886-4	Sandra Eto	Consultation to Inform Identification The Draft PA indicates BLM will identify properties to which Japanese Americans attach cultural significance, pursuant to 36 Code of Federal Regulations (CFR) 800.2(c)(5). Given the expertise and jurisdiction of the NPS over properties within the non-physical APE and/or that may be affected by the proposed project, the NPS needs to be included in any discussion regarding the handling of these types of properties. The entire 34,000-acre WRC site is an area within which the activities occurring between 1942 and 1945 have made a significant contribution to the lives of 120,000 Japanese Americans and their descendants, and the culture of the Japanese American community since World War II, as well as the history of the US as a Nation.	The NPS is a consulting party on the project under NHPA Section 106 and will continue to be consulted by BLM on the identification of historic properties and potential effects to them as the Section 106 process is completed under a final PA.
11991-13	Julie Abo	NEPA is not a collaborative process. The consulting parties' and the public's role is simply reacting to a a very complex plan that is difficult for people who are not familiar with archeology, geology, preservation, conservation and other terms and concepts that are needed to understand the scoping comments and the DEIS and participate in meetings that are difficult to attend during the day. We (the Japanese American community) haven't been part of shaping the plan. As stated in the DEIS: "However, the BLM will continue to solicit input from environmental justice populations regarding potential mitigation measures for adverse effects to facilitate collaborative decision-making throughout this EIS process." It is disingenuous to characterize this process as "collaborative."	See response to comment 6900-1 (see in Table A-3ff, Consultation and Coordination). The BLM also prepared the *Lava Ridge Wind Project Stakeholder Assessment and Engagement Report* to conduct a situation assessment that focused on the Japanese American communities with connection to the Minidoka NHS. The situation assessment was designed to gather information and recommend approaches for a public involvement strategy and identify what characteristics of the NHS are most important to these stakeholders (BLM 2022).
11991-21	Julie Abo	It is noted in the DEIS: "Tribes have noted they would consider the presence of the project on the landscape severely impactful. The Shoshone-Bannock Tribes specifically voiced concerns that the project would impact traditional Tribal resources relating to hunting, gathering, and other practices. The Shoshone-Bannock Tribes voiced concerns about severe cultural and spiritual impacts on their members, dark skies concerns related to turbine lighting that would present severe effects to Tribal practices in the area, and concerns for the diminishment of their exercise of Treaty Rights in the area." (page 3-208) This should be high on the list of concerns for the BLM and the Department of the Interior.	See response to comment 11585-4 (see in Table A-3ff, Consultation and Coordination).
12398-22	Environmental Protection Agency	Potential Impacts to Biological Resources EPA recommends that the FEIS include information on working with the U.S. Fish and Wildlife Service, and as appropriate, with the Idaho Department of Fish and Game, including recommended measures to reduce risks and protect biota and habitat during implementation of the proposed project. In addition, include in the FEIS information on the outcomes of Section 7 of the ESA consultations with the Service and coordination with other agencies. The DEIS indicates the project may impact federally and state protected species occurring on the analysis area or vicinity, including many bird and bat species, bald and golden eagles, sage-grouse, pygmy rabbit, and yellow-billed cuckoo. The impacts will be related to the anticipated suitable habitat degradation, fragmentation, alteration, and loss; higher than optimal noise levels especially during project construction activities; air quality from smoke and fugitive dust, as well as mortality due to collision with turbines and vehicles. As a result of	Consultation and coordination with USFWS, IDFG, and other agencies is summarized in the Consultation and Coordination Section of EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers). This section notes the role each agency played in the development of measures to minimize or avoid impacts to biological resources. BLM has continued to coordinate with USFWS during the development of the FEIS and is currently preparing a BA for Section 7 Consultation. Although the BA and Section 7 Consultation will not be completed prior to the publication of the FEIS, these will be completed prior to, and the outcome will be summarized in, the ROD. EIS Appendix 3 (Issues Analyzed Brief) includes preliminary effects determinations for all species included in the official species list for the project. As stated in EIS Appendix 3, the project would have no effect on any ESA-listed plant species because none are present in the siting corridors (see AIB-43 in Table App3-1). The project would have no effect on Canada lynx, grizzly bear (Greater Yellowstone ecosystem and Selkirk-Cabinet populations), northern Idaho ground squirrel, wolverine, bull trout, Banbury Springs limpet, Bliss Rapids snail,

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		collision with turbines alone, the DEIS indicates that up to more than 15,000 bats could die each year the project will operate.	Bruneau hot springsnail, or Snake River physa because these species do not occur in the general project area (see Tables App3-4 and App3-5). The yellow-billed cuckoo (western distinct population segment) may migrate through the siting corridors but riparian habitats for foraging and breeding cuckoos are not present. The monarch butterfly, which is a candidate for ESA listing, is discussed in EIS Section 3.11.3 (Monarch Butterfly).
12469-4	Mike Telford	Coordination The DEIS states on the front page that Minidoka, Jerome, and Lincoln counties, along with the State of Idaho are cooperating agencies. Its is my understanding (see NEPA) that The BLM is required to work with and consider input from the counties, state and local governments. Those three counties have all passed resolutions against Lava Ridge and urge Alternative A. In addition, a historic joint resolution in opposition was sign by all 7 magic valley counties. This historic event took place April 6 2023 at the Historic Japanese internment camp location in Jerome County. Both houses of the State legislator have passed unanimous resolutions in opposition to Lava Ridge. Additionally, the Idaho Governor, Lt Governor, and the Attorney General have joined Idaho's national Delegation of Senators and Congressmen in declaring opposition to Lava Ridge.	The seven cooperating agencies for the project are the NPS, the USACE, the USFWS, the State of Idaho, Jerome County, Lincoln County, and Minidoka County. As noted in the Cooperating Agencies section of draft EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), the BLM solicited input from cooperating agencies during the planning, scoping, and EIS analysis phases, and will continue to solicit input from cooperating agencies throughout the EIS process. Any new input received has been addressed in the final EIS. This section of EIS Appendix 10 provides a list of cooperating agencies and their authority/expertise (Table App10-2) and summarizes how input received from cooperating agencies has been incorporated into the EIS analysis. For a summary of the role of cooperating agencies in the NEPA process, please refer to 43 CFR Subsection 46.230 (https://www.law.cornell.edu/cfr/text/43/46.230): In accordance with 40 CFR 1501.6, throughout the development of an environmental document, the lead bureau will collaborate, to the fullest extent possible, with all cooperating agencies concerning those issues relating to their jurisdiction and special expertise. Cooperating agencies may, by agreement with the lead bureau, help to do the following: (a) identify issues to be addressed; (b) arrange for the collection and/or assembly of necessary resource, environmental, social, economic, and institutional data; (c) analyze data; (d) develop alternatives; (e) evaluate alternatives and estimate the effects of implementing each alternative; and (f) carry out any other task necessary for the development of the environmental analysis and documentation.
13008-13	Scott Hauser	Secondly, the use of the phrase "other Shoshone-Paiute groups" is vague and leaves potential for many Native American groups to be left out of this discussion. The Shoshone and Paiute people were very nomadic and traveled extensively throughout their home range, which included everything from southern Utah and Northern California to Canada and from Wyoming and Montana to the Pacific Coast. USRT feels there should be much more effort in reaching out to all Shoshone and Paiute tribes, people, and communities, as well as other Native American groups and communities that historically inhabited this area.	The Section 106 Consultation and Government-to-Government Tribal Consultation sections of draft EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers) summarize the BLM's outreach and consultation efforts with regard to Native American Tribes with ties to the project area. The BLM contacted the following Native American Tribes to provide information on the project and the Section 106 process and to inquire about engaging in future consultations: the Shoshone-Paiute Tribes of the Duck Valley Indian Reservation (Shoshone-Paiute Tribes), the Shoshone-Bannock Tribes of the Fort Hall Indian Reservation (Shoshone-Bannock Tribes), the Northwestern Band of the Shoshone Nation (Northwestern Band), the Nez Perce Tribe of Idaho, the Te-Moak Tribe of Western Shoshone including the Battle Mountain Band, the Elko Band, the South Fork Band, the Wells Band, and the Confederated Tribes of the Goshute Reservation. In summary, the BLM did reach out to additional Native American Tribes and not simply the Shoshone-Paiute in general. As noted within this context, the Shoshone-Paiute Tribes specifically refer to the Shoshone-Paiute Tribes of the Duck Valley Indian Reservation. Per EIS Appendix 10, the Shoshone-Paiute Tribes, the Shoshone-Bannock Tribes, and the Northwestern Band of the Shoshone Nation have chosen to consult with the BLM and participate in the Section 106 process, including development of the PA.
2826-1	Kelly Campbell	Oregon Physicians for Social Responsibility (PSR) requests to be a Consulting Party for section 106 compliance on the issue of the siting of Magic Valley Energy's Lava Ridge Wind Project. Guided by the values and expertise of healthcare and public health, Oregon PSR works to protect human life from the gravest threats to health and survival by striving to protect our climate, end the nuclear threat, promote peace, and advance justice. As the local affiliate of the International Physicians for the Prevention of Nuclear War and the International Campaign to Abolish Nuclear Weapons, Oregon PSR was honored to share in both the 1985 and 2017 Nobel Peace Prize for our work to educate about the dangers of nuclear weapons and nuclear war. As part of our educational work to prevent nuclear war, Oregon PSR works closely with the Japanese and Japanese-American communities in Oregon as well as other community partners to organize the annual commemoration of the bombing of Hiroshima and Nagasaki every year at the Japanese-American Historical Plaza in Portland, Oregon, drawing hundreds of participants. Our partners at the Portland Japanese American Citizens League and Japanese American Museum of Oregon have alerted us to their opposition to the siting of Magic Valley Energy's "Lava Ridge Wind Project" on the historic footprint of the Minidoka National Historic Site and where almost all 400 turbines would be visible to visitors. The Minidoka National Historic Site is where thousands of Oregon residents of Japanese ancestry were unjustly imprisoned during World War II, and the preservation of this historic site is important for all visitors to help us understand the chilling injustice, critical civil rights lessons, and to lift up the stories of the individuals forcibly removed and incarcerated there from 1942 to 1945. Part of the significance of the location that visitors still witness today is its remote and desolate location. We question whether the siting such a massive wind project where it is highly visible and detracting from the experience of this National Historic Site is appropriate. Oregon PSR is an organization that strongly supports a just transition to 100% clean energy, and has worked on many campaigns to do just that. We know that our clean energy future will necessarily include a significant commitment to wind power. However, key to this just transition is ensuring that historically marginalized communities have a say over where and how clean energy projects are sited, so as to not replicate the injustices of the past. We are writing to express our	The Cultural Resources section (Section 3.5) of the draft EIS, Section 3.5.2, provides background on the Minidoka WRC and Minidoka NHS, an assessment of project-related impacts under each action alternative, and a summary of Japanese American community concerns associated with the project. In the context of environmental justice, the interests and concerns of Japanese Americans within the analysis area are further described in EIS Section 3.6.1 (Environmental Justice Communities) and Section 3.6.1 of Appendix 9. The BLM and the Office of Collaborative Action and Dispute Resolution have implemented proactive approaches to solicit input on the EIS from members of the Japanese American community. These parties have also been included in Section 106 consultation, as described in the Section 106 Consultation section of EIS Appendix 10. See also EIS Section 3.5 and Section 3.6.1 (Environmental Justice Communities) for EIS analyses regarding potential project impacts to cultural resources and environmental justice communities. The BLM will consider the request of the PSR for consulting party status under Section 106 of the NHPA.

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		concern that the siting of this project where it will detract from the experience of visitors to the Minidoka National Historic Site is not appropriate, and that instead, other sites where it will not have such a negative cultural and historical impact should be sought out. We urge you to listen to the comments of individuals and organizations connected to those who were incarcerated at Minidoka as you decide where to site this project. We appreciate the opportunity to submit comments on this project and look forward to being informed about next steps as a Consulting Party.	
3302-7	Susan Canham	Who decides that this project is "unlikely to cause, or contribute to, a trend toward listing under the ESA" for bees, beetles, etc., and what happens if it does?	The Pollinators and Insects section of the EIS (Section 3.11) provides analysis of project effects to pollinators (Section 3.11.1); the St. Anthony Sand Dune Tiger Beetle (Section 3.11.2), monarch butterfly (Section 3.11.3), and BLM special-status bumble bees (Section 3.11.4). The statement made regarding a trend toward listing under the ESA is made with regard to the St. Anthony sand dune tiger beetle, specifically (see Section 3.11.2 [St. Anthony Sand Dune Tiger Beetle]), and is based on the analysis of the results of the desktop assessment and field survey of potential habitat for St. Anthony sand dune tiger beetle in the analysis area. With applicant-committed measures and additional mitigation applicable to the St. Anthony sand dune tiger beetle (summarized in EIS Appendix 4), impacts to the St. Anthony sand dune tiger beetle would be largely minimized or avoided; if it is determined that complete avoidance is not feasible, compensatory mitigation measures (see Table App4-5 in EIS Appendix 4) may be required. With this minimization and avoidance in mind, in consideration of whether project effects on individual St. Anthony sand dune tiger beetles and suitable habitats would be irretrievable and irreversible, the draft EIS analysis indicates that although irretrievable, the effects would not be irreversible because the majority of existing tiger beetle habitat would be unaffected by the project, and because the small number of individuals that may be killed would not likely result in a trend toward federal listing under the ESA or a loss of population viability. As stated above, if it is determined that complete avoidance is not feasible, compensatory mitigation measures may be required. BLM considered the information presented in the baseline reports and developed appropriate mitigation measures (including pre-construction field verification surveys, complete avoidance of occupied habitat, minimization of effects in potential habitat and dispersal areas, and compensatory mitigation for residual impacts) that, when implemented, would ensure that no alternative results in a trend toward ESA-listing or loss of population viability.
3527-1	Diana Nielson	For some reason the BLM has failed many times to mention Option A. The Maps, RAC meetings, Sub RAC meetings and presentations I have been to have failed to show the Option A, No Build Option on their maps. This Opton A is only mentioned in our comment periods. The Friends of Minidoka, Shoshone Bannock Tribes and the grassroots group Stop Lava Ridge has recently brought this to the BLM's attention. As Part of the NEPA process the BLM has to work with the communities and Local Governments. So far the Commissioners of Jerome, Minidoka, Lincoln, Gooding, Twin Falls, and Camas Counties have signed Resolutions against Lava Ridge Wind Turbine Project. We have approached Blaine County Commissioners to also sign a resolution against Lava Ridge Wind Turbine Project. We need our State Government to stand up against Lava Ridge. We do not want our States Endowment Lands in Lava Ridge. The gentrification of Rural Idaho and its underserved populations is a violation of our way of life. I LOVE MY STATE OF IDAHO. KEEP IT WILD AND FREE. DO NOT SELL US OUT TO CAISO AND INVESTMENT CORPORATIONS!	See responses to comments 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement) and 9275-5 (see in Table A-3ee, Alternatives). See Consultation and Coordination in Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers) regarding parties involved in project consultation and coordination.
6900-1	Name Not Provided	The Section 106 consultations are not worth the effort of any person opposing the project. The Section 106 PA does not allow for consulting parties to oppose the project, have their dissent matter, and are virtually powerless in the decision-making process. Consulting parties should have been told up front that if they don't want the project, then their time is wasted in participating in numerous consultation meetings when the end result is going to be a selection of one of the action alternatives.	The regulations guiding the Section 106 process under the NHPA state that federal agencies are required to take into account the effects of their undertakings on historic properties and afford the ACHP a reasonable opportunity to comment on such undertakings. The procedures under the Section 106 regulations define how federal agencies meet these statutory responsibilities. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of project planning. The goal of consultation is to identify historic properties potentially affected by the undertaking, to assess its effects, and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties (see 36 CFR 800.1 [Purposes]). Pursuant to regulation, 36 CFR 800.2(c)(5), certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties or their concern with the undertaking's effects on historic properties. Consulting party status entitles you to share your views, receive and review pertinent information, offer ideas, and consider possible solutions together with the federal agency and other consulting parties. It is not a forum for project opposition. See ACHP (2021). Failure to Resolve Adverse Effects (or "termination of consultation") under Section 106 does not constitute automatic cancellation of an undertaking/project or an inherent requirement to avoid adverse effects to historic properties. Throughout the NEPA process, the BLM is considering and addressing in the EIS, input received from cooperating agencies, consulting parties, government-to-government consultation with Tribes, Japanese American and Minidoka-connected communities, and the public. This input is considered in the BLM's alternatives development and decision-making (see the project scoping report available on the BLM project website: https://eplanning.blm.gov/eplanning-ui/project/2013782/510 [SWCA 2021]) and the BLM's

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			consultation and coordination documentation in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers). Please note that the BLM's scoping and identification of a preferred alternative does not indicate that the BLM would authorize the project. The BLM's decision on the project would be reflected in their ROD. The BLM also contemplates public input received on the EIS, and during Section 106 review, the PA. If consulting parties or the public have concerns regarding an undertaking, its effects on historic properties, or associated analyses, they are encouraged to make these known by submitting them in writing to the lead agency for review and consideration. It is not uncommon for PAs to reflect views from consulting parties or the public who have expressed such concerns. The BLM timed revisions to the draft PA (EIS Appendix 8) to occur after the public comment period on the draft EIS ended, so that any public comments or consulting party comments received concerning cultural resources could be addressed as appropriate. Advisory Council on Historic Preservation (ACHP). 2021. *Protecting Historic Properties: A Citizen's Guide to Section 106 Review*. Available at: https://www.achp.gov/sites/default/files/documents/2021-01/CitizenGuide2021_011321.pdf. Accessed December 28, 2023.
9657-7	Saiyare Refaei	If there is not proper consultation and full approval from neighbors, local tribes and culturally significant sites that have been deemed historically significant then construction should not progress.	See responses to comments 6900-1 (see in Table A-3ff, Consultation and Coordination) and 12469-4 (see in Table A-3ff, Consultation and Coordination).

Cumulative Effects

Table A-3gg. Cumulative Effects

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1042-7	WildLands Defense	There are MET towers now peppering BLM land areas north of Salmon Falls Dam, and another immense wind project very foreseeably looms there – with potential for a huge additional amount of killing migratory birds, bats, Golden Eagles and other wildlife over a whole other landscape, and killing large numbers of individuals as another big blow to local, regional and range-wide populations. How large does BLM estimate that project will be and with how many turbines? An equal or greater number – as Idaho is turned into a desolate energy exploitation zone to perpetuate Las Vegas sprawl.	The Salmon Falls Wind project was included in the RFFAs (Section 3.1.1 [Existing and Future Trends and Actions]) evaluated in the cumulative effects analysis.
10557-1	Robert Penney	Finally, although this is a stand-alone proposal it is only one of several similar projects being studied for the local area. As such, its approval would set a precedent for approval of the rest. While impact of any one proposal might not be tragic or permanent, approval of numerous similar local projects cannot help but change the future of local wildlife permanently and for the worse.	The cumulative effects of the project in combination with other RFFAs are described in Section 3.18.1.2.7 (Wildlife Movement [non-game mammals and reptiles], Cumulative Impacts) and Section 3.18.2.2.7 (Big Game Habitats and Populations, Cumulative Impacts).
11315-3	Karen Atkinson	Description of Impacts: Each of the Impacts descriptions for the Action Alternatives (B, C, D, and E) in Sections 3.6.2.2.2-5 and Cumulative Impacts Section (3.6.2.2.6) and associated tables do not describe the impacts on Alaska Natives.	Alaska Natives are part of the larger "Japanese American and Minidoka-Connected" dispersed environmental justice community. Section 3.6.1.1 (Dispersed Environmental Justice Populations) and Section 3.6.1 in EIS Appendix 9 has been revised to clarify that Alaska Natives are part of the larger Minidoka-connected community due to their connections with Minidoka NHS and WRC.
11326-1	Filip Camacho, Tasha Sorensen	Responsible energy development includes proper site selection and taking a hard look at the scale of proposed projects. The BLM needs to consider scale at the level of maximum impact. In the DEIS, the scale of multiple proposed renewable energy projects in this area should be included in a cumulative effects analysis. As the U.S. ramps up domestic production of energy resources, our land management agencies must think and act differently if we are to avoid the same mistakes of the past. For example, we are still cleaning up abandoned hard rock mines from over a century ago and struggling to just identify all the orphan and abandoned oil and gas wells across the U.S.—let alone plug and reclaim them. The Lava Ridge project is massive with proposed development upwards of over 300 square miles for this one project. In the DEIS, the BLM fails to address cumulative impacts of this project. Notably, the BLM should be required to address cumulative impacts from Tauraus Wind Project (and other proposed projects in the vicinity totaling over 200,000 acres in developments), located immediately northwest of the Lava Ridge Wind Project, and a project that would be similar in size and scale to the Lava Ridge Wind Project. The BLM must use the best available science and improved mapping technology to identify areas with minimal resource conflict and already disturbed areas that may be suitable for renewable energy development. Our remaining, intact public lands should not be carved up before exhausting all other options. Without fully analyzing all related activity and development, the BLM risks overlooking the direct, indirect, and cumulative impacts to fish and wildlife habitat, nearby communities, farms, ranches and cultural and Tribal resources.	Taurus Wind is included in the RFFAs evaluated in the EIS (Section 3.1.1 [Existing and Future Trends and Actions]).
11327-21	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	There is little that is currently in place that requires projects to avoid development in big game migration routes, winter range, and stopover areas. Even if the BLM chooses to select Alternative A, or "No Action," for Lava Ridge, there are very few mechanisms in place today that prevent the next proposal to come in behind it on the same landscape. There are many unique challenges and issues to Lava Ridge, but these issues are likely to	The BLM has developed mitigation specific to big game migration. This was added to final EIS Appendix 4 (Mitigation) and Section 3.18.2 (Big Game Habitats and Populations).

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		spill over into other proposed renewable energy projects in our state. This is especially concerning as the BLM is currently working through applications for 11 solar, wind, and geothermal projects in the Twin Falls District alone. The DEIS notes that three solar energy facilities (by Invenergy and Longroad) and another another wind facility (Taurus Wind Project) are already proposed in the analysis area adjacent to the proposed Lava Ridge Wind Project. Many of the proposed project footprints overlap with big game winter range, mapped migration routes and stopover areas for pronghorn and mule deer, and important raptor and eagle habitat.	
11327-23	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	ii) Potential Continental-Scale Consequences The Draft EA fails to recognize that Golden Eagle fatalities in Idaho could have broader continental-scale population impacts. Given the value of the state for supporting breeding, wintering and migrating individuals, eagle fatalities at Lava Ridge could have far-reaching consequences. For an international example that holds powerful similarities to Golden Eagles in Idaho, researchers in Spain - which is the world's third largest wind-power producer after the United States and Germany - examined the population response of Egyptian vultures (a long-lived raptor that had the bulk of its breeding population in Spain) to wind farms35. They found that even "very low" reductions in survival associated with wind-farms strongly impacted the species' population viability. The authors note the extension of this research in the management of other imperiled, long-lived species, notably Golden Eagles. Numerous researchers have documented the effects of renewable energy projects extending far beyond the location of energy production to impact bird populations in distant regions across continental migration networks. In 2017, this was demonstrated with Golden Eagles killed at the Altamont Pass Wind Resource Area in California. Researchers used genetic and stable isotope data to show that the effects of local-scale wind-energy associated fatalities can have continental- scale consequences36. In the Conkling et al. (2022) research, eagle mortalities originated from both local and non-local subpopulations and vulnerability population-level effects occurred to both. Additionally, Domenech reported to the Wyoming Golden Eagle Working Group of results of his work to determine natal origins of eagles killed at Wyoming wind energy facilities37. Based on feather samples from 33 juvenile (n=11) and immature (n=22) Golden Eagles killed on five wind farms in Converse and Carbon Counties from 2017-2019, he found that 67% had natal origins significantly north of where they were recovered in Wyoming, indicating that the majority killed and collected were possibly migrants or long-distance dispersers. Additional work is being conducted by Dr. Katzner at the U.S. Geological Survey, who is working with a team of researchers to determine the range-wide demographic consequences of fatalities of Golden Eagles. Effective management of energy production is improved by an understanding of its consequences, locally, nationally, and globally. Given the loss of approximately 3 billion birds in North America since 197038 and the ecological/economic value of avian species, understanding and mitigating the many threats to bird populations is critical to make renewable-energy industry truly sustainable. Conkling et al. (2022) note in the closing paragraph of their publication, "In the case of renewable energy, decisions about facility siting, investment and development, as well as management and mitigation actions, will be most effective if they consider both local and non- local impacts to focal species, and if their demographic frame of reference extends to breeding, wintering or stopover habitat far from where the facility is located." We strongly encourage the BLM to explore the population-level consequences of the proposed project and all the potential mechanisms to minimize, mitigate, and reduce negative consequences of this project on broader populations as a whole. For this reason, we applaud these two options in Applicant-committed measureNumber 157, "Providing physical samples for the U.S. Geological Survey or other agencies interested in analyzing such samples" and "Providing funding for research or conservation efforts to be implemented for the benefit of impacted species", as both will advance collective knowledge and improve future management efforts.	See response to comment 10442-7 (see in Table A-3d, Eagles).
11353-2	Don Wind, Dave Price; Oregon-California Trails Association	Page 3-1, Section 3.1.1, Existing and Future Trends and Actions Page 3-3, Figure 3.1-1, Existing and future trends and actions near the siting corridors Page 3-186, Section 3.5.6.2.6, Cumulative Impacts Cumulative impacts to the Oregon Trail in Idaho and the California Trail in Nevada are multiplied by transmission lines and other infrastructure needed to deliver power generated by the Lava Ridge Wind Project (LRWP). The project causing the greatest adverse effects to these Trails is the Southwest Intertie Project – North (SWIP-North). This 500 KV transmission line crosses the Oregon Trail near Twin Falls, and also crosses the California Trail, the Pony Express Trail, and Hastings Cutoff in Nevada, ruining the viewshed in those pristine areas and having potentially significant physical impacts to the Trails themselves. SWIP-North has been proposed as the primary transmission line project for the delivery of LRWP electricity to Ely and markets in southern California. The LRWP is dependent on the SWIP-North transmission line to deliver generated power to proposed customers. This EIS lacks a thorough explanation of cumulative impacts caused by separate projects, but projects that are dependent on each other for their value and purpose. OCTA finds that treatment of the cumulative impacts of SWIP-North as necessary ancillary infrastructure is sorely lacking in this draft EIS and needs to be addressed in a more thorough and detailed way. Unfortunately, other energy projects proposed for south-central Idaho will also have additional cumulative effects on the Oregon and California Trails in Idaho. Other projects contributing cumulative impacts to the Trails include the Taurus Wind Project, the Salmon Falls Wind Project, and the Gateway West Transmission Line. While the EIS lists these projects as contributing to additional impacts to cultural resources in the area, it lacks a thorough explanation of cumulative impacts to the Oregon and California Trails in Idaho. The BLM should place a greater emphasis in this EIS on the impacts of cumulative effects of the multiple energy and energy infrastructure projects proposed for this area. To focus on each project individually, while ignoring the cumulative effects of at least five energy and energy infrastructure projects in relatively close proximity to one another, will produce adverse impacts in the field never recognized with each new proposed project. This EIS lacks the specificity of cumulative effects and what is to be done to address these effects. This EIS does not address how the cumulative adverse effects are going to be avoided	The projects listed by the commenter are evaluated in the cumulative effects analyses of the EIS. The SWIP-North project has already been authorized and although the Lava Ridge Wind project could tie into SWIP-North, SWIP-North is not a "connected action" because the Lava Ridge Wind project could also tie into the Midpoint substation. Impacts to the Oregon Trail and its various components (e.g., Milner Ruts) are specifically analyzed between each action alternative in EIS Section 3.5 (Cultural Resources). This includes consideration of cumulative impacts. Where project action alternatives would have visual impacts on the Oregon Trail, per the EIS, then cumulative impacts from the project would occur in combination with the visual impacts of other existing and reasonably foreseeable projects (e.g., the Salmon Falls Wind Project in relation to Milner Ruts). Please note that Milner Ruts were the location where KOP 4 was placed to help consider the visual impacts to the Oregon Trail; however, as stated in the EIS (Section 3.5), Oregon Trail analyses rely on the field-verified trail segments within the project viewshed in the non-physical APE for each action alternative.

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		or minimized. This EIS does not address how the cumulative effects of multiple projects will affect the decision-making process for the LRWP.	
11491-3	Dean Dimond, Jennie Bateman	The Purpose and Need for this Wind Project is treated as stand-alone with no measurable impact to meet unidentified energy shortfalls from existing projects. In other words, to add a ROW of this size to BLM lands, we must be aware of what role this additional electric generating project will play in meeting the needs of the Nation's power grid and other energy needs to address cumulative effects and the actual environmental effects pursuant to the NEPA.	See response to comment 12307-2 (see in Table A-3ll. Purpose and Need).
11491-6	Dean Dimond, Jennie Bateman	No information generated in this document indicates a full interdisciplinary analysis of even the separate areas of concern identified as to their cumulative impacts to the project area and upon the people living in the immediate area and to the American people.	As per 40 CFR 1502.2, EISs shall not be encyclopedic. The RFFAs in the project area for which information is publicly available are described in Section 3.1.1 (Existing and Future Trends and Actions) and evaluated in the cumulative impacts analysis for the resources analyzed in detail in the EIS.
11491-24	Dean Dimond, Jennie Bateman	28. A full disclosure of impacts of other wind projects in the USA as to bat, insect, bird and other fatality and injury numbers,	See responses to comments 11808-4, 12982-17, and 11534-22 (see all in Table A-3gg, Cumulative Effects). Cumulative impacts to pollinators and other insects are disclosed in EIS Section 3.11 (Pollinators and Insects).
11514-2	Judy Ruprecht	Cumulative impacts are those that result from the collective effects of multiple projects across the landscape. Each project has an individual impact on the environment, but the cumulative effects of multiple projects have the potential to be greater than the sum of the individual projects alone. Very little is known about the cumulative effects of multiple large scale projects. We cannot ignore the accelerated rate at which renewable projects are being proposed across the state.	See response to comment 12982-17 (see in Table A-3gg, Cumulative Effects).
11518-3	Karen Steenhof	Furthermore, Lava Ridge is not the only wind project planned for the immediate area. It is essential that BLM evaluate the cumulative effects of all proposed projects before any individual projects are authorized.	The RFFAs in the project area for which information is publicly available are described in Section 3.1.1 (Existing and Future Trends and Actions) and evaluated in the cumulative impacts analysis for the resources analyzed in detail in the EIS.
11523-1	Janice Simpkin	* There is no statewide/regional plan to assess cumulative effects of land uses. Developing a comprehensive plan would provide a tool for land managers to site projects appropriately to minimize damage. Such a plan should consider, in part, the following: o impacts on wildlife (especially birds, bats, and migratory mammals) o Community impacts that include housing, transportation, and equity o Equitable electricity distribution to local communities	The BLM is preparing a programmatic EIS for wind and solar energy that will address the issues mentioned in the comment. Although it will not be ready before publication of the Lava Ridge Wind EIS, the Lava Ridge project is being considered in the programmatic EIS.
11534-21	Matt Arnold, William Eubanks	Arbitrary Analytical Limits Render the DEIS's Cumulative Impact Analyses Useless for Informing the Public and Decisionmakers In conducting an analysis of the Project's environmental "effects," NEPA obligates BLM to evaluate "cumulative effects," which the Act's implementing regulations define as "effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. §§ 1508.1(g)(3), 1502.16(a)(2). As indicated above, "[a] proper consideration of the cumulative impacts of a project requires 'some quantified or detailed information; . . . [g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.'" Klamath–Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt., 387 F.3d 989, 993-94 (9th Cir. 2004) (quoting Ocean Advocates, 361 F.3d at 1128). This analysis "must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects." Id. at 994. The DEIS's cumulative impact analyses do not pass muster under this test. As a threshold issue, BLM inexplicably limits the scope of its cumulative impacts analyses to other anticipated wind-energy projects; in other words, BLM ignores the effects of other built or planned projects in the analysis areas. Compare DEIS at 3-55–56 (Project's cumulative effects on bats), and id. at 3-100 (eagles), with id. at 3-115 ("Three solar energy facilities . . . are proposed in the analysis area adjacent to the Lava Ridge Wind Project."). However, BLM never explains why it excluded from its analysis other fatality sources that presently or will occur in the area. This is a troubling oversight since these alternative kinds of energy projects also entail significant sources of mortality for bird and bat species. See, e.g., K. Shawn Smallwood, Utility-scale Solar Impacts to Volant Wildlife, J. WILDLIFE MGMT., May 2022, at 1-2 (finding that fatalities/MW/year "averaged 11.61 birds and 0.06 bats at [photovoltaic panel] projects and 64.61 birds and 5.49 bats at solar thermal projects," totals which "consistently exceeded those reported").17 BLM's failure to analyze the expected impact of these projects alongside its current proposal, therefore, arbitrarily understates the full extent of the Project's impacts. This must be corrected in order to satisfy the agency's NEPA obligations.	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline. EIS Section 3.3.1.2.7 (Bat Populations and Roosting Habitat, Cumulative Impacts) and EIS Section 3.3.2.2.7 (Avian Populations, Cumulative Impacts), provide a quantitative analysis of both mortality from existing wind facilities within the analysis area, as well as reasonably foreseeable future wind projects. Other sources of mortality are discussed qualitatively because there is insufficient data to quantify all possible cumulative sources of mortality for birds and bats within the analysis area, and because the issue evaluated in the EIS is specific to the effect that turbines would have on avian and bat populations. Even if other sources of mortality could be precisely quantified, there is insufficient data on the current population sizes and trends to perform a quantitative analysis for most avian and bat species. Both EIS Section 3.3.1.2.7 and 3.3.2.2.7 disclose the potential for the cumulative effects to result in the decline of some populations of birds and bats. As noted in these sections, fatalities from turbine collisions represent a relatively small proportion of overall avian fatalities from anthropogenic sources and are not a major threat to most avian species, while for bats, turbine collisions are a major source of mortality for many species (especially migratory tree bats) and their populations may be threatened by the continued development of wind energy if sufficient measures are not implemented to minimize or avoid these fatalities. Since the project's contribution to cumulative effects to avian and bat species is proportionate to the generation capacity of each alternative, the cumulative effects analyses for avian and bat species use the percentage increase in existing wind generation capacity within their respective analysis areas as quantitative estimate of each alternative's relative contribution to cumulative effects from fatalities due to turbine collisions. The RFFAs described for greater sage-grouse (at draft EIS 3-115) in EIS Section 3.3.4.1.4 (Greater Sage-Grouse, Existing and Future Trends and Actions) differs from those presented for bats (at draft EIS 3-55) in EIS Section 3.3.1.1.3 (Bat Populations and Roosting Habitat, Existing and Future Trends and Actions) and eagles (at draft EIS 3-100) in EIS Section 3.3.3.1.1 (Eagles, Existing and Future Trends and Actions) because each of these resources has a different analysis area specific to that impact analysis.
11534-22	Matt Arnold, William Eubanks	the DEIS's limited discussion of wind-project-driven cumulative impacts is insufficient. With respect to bats, for instance, the DEIS concludes that "the cumulative impacts of numerous facilities with high fatality rates across the landscape could compound the impacts on bat populations." DEIS at 3-43; see also id. at 3-56 (explaining that the Project "would contribute to additional turbine collisions that could lead to declines in bat populations in the analysis area over the next 30 years," even "if fatality rates were relatively low"). According to BLM, a more fulsome analysis "is impossible" because it "would depend on several site-specific variables at each project location, the number and size of turbines that would be used, and the implementation and effectiveness of mitigation measures to reduce impacts to bats." Id. at 3-43. The problem with BLM's claimed inability to assess	See responses to comments 11808-4 and 12982-17 (see both in Table A-3gg, Cumulative Effects). For birds and bats, wind projects are a substantial source of mortality, and the EIS discloses that wind projects alone could result in significant effects to bird and bat populations. Section 3.3.1.2.7 (Cumulative Impacts) discloses that impacts of the project in combination with the RFFAs would be significant.

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		the impacts of other proposed wind- energy facilities is that the same limitations ostensibly apply to its analysis of this Project. Indeed, the same "site-specific variables"—such as the number and size of the turbines that will be used, and the implementation and effectiveness of mitigation measures—remain undefined for this Project in the DEIS. See DEIS at 3-8 ("[T]he exact location of project components is not yet known . . ."); id. at 2-2 ("The project's final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD."); id. at 3-57 ("Final residual impacts and compensatory mitigation will be described in the final EIS after public comments are considered."). BLM, however, never explains why the guesswork that supports its DEIS analysis for this Project cannot be used to examine the cumulative impact of these forthcoming projects. Instead, it merely regurgitates the conclusions of its alternatives analysis by listing which alternatives may contribute the most impacts relative to one another. See DEIS at 3-56 (ordering Alternatives C–E according to their "proportional contribution to wind capacity in the analysis area"). Of course, this restatement does not provide "a useful analysis of the cumulative impacts of past, present, and future projects" because it fails to inform the public whether the "total impact from [these] actions [are] greater than the sum of the[ir] parts." Klamath–Siskiyou Wildlands Ctr., 387 F.3d at 994. For these reasons, the DEIS's cumulative impacts analysis is deficient and must be corrected before this Project moves forward.18	
11534-23	Matt Arnold, William Eubanks	The DEIS does, however, use "federal and state renewable energy mandates" to downplay the reduced cumulative effects that would be associated with approving a smaller version of the Project. See DEIS at 3-87 ("[A]lternatives that substantially reduce the generation capacity of the Lava Ridge Wind Project may result in additional wind energy projects being constructed elsewhere within [the avian analysis area] in order to meet federal and state renewable energy mandates, which could result in a similar level of cumulative impacts across all the action alternatives."); see also id. (reasoning that smaller versions of the Project might actually "result in greater impacts to avian populations").	The draft EIS discloses that additional wind projects could be constructed, and Section 3.1.1 (Existing and Future Trends and Actions) discloses that specific projects have already begun the planning and permitting stage.
11535-153	Steven Andersen	Multiple wind farms are in development in south Idaho. The EIS should display maps showing the wind farms (both on private and public lands) along with the Lava Ridge proposal to show the separate and cumulative adverse visual impacts upon historic properties, sites, and districts listed or eligible for listing in the National Register or Historic Places. This is particularly important when considering the potential impacts of pending renewable energy applications in the area as depicted in the BLM's map below:	Figure 3.1.1 and Figure 3.16.3 provide the locations of the RFFAs analyzed in the EIS, including other wind projects.
11535-154	Steven Andersen	The cumulative effects analysis in the DEIS is inadequate and fails to account for necessary past, present and future foreseeable projects and how this project will incrementally contribute to impacts in the area. Given the sensitivity of the area combined with the inundation of recent and foreseeable projects, the cumulative effects analysis should have been robust. The proposed project will interact with many others to affect lands and wildlife in the project area and throughout the west – including avian and bat populations, aquatic systems, human perturbations, including irrigated agriculture, wildfires, livestock grazing, road networks, native species and ecosystem function --- this all must be thoughtfully analyzed.	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline.
11535-155	Steven Andersen	Additionally, given the area of the proposed project, the agency must look carefully at the cumulative impacts to cultural resources including archaeological and cultural resources. The area has tribal and historical significance, including the Minidoka National Historic Site. A comprehensive study of cumulative impacts, including a field inventory of the area to be subjected to inundation and surface disturbance should have been undertaken by a qualified archaeologist, and a full analysis of cumulative impacts presented for each alternative, taking into account: foreseeable energy projects based on pending renewable energy applications; the Gateway West transmission lines (running east to west north and south of Lava Ridge); the two WEC transmission lines (running east west and north south); and SWIP North.	Cumulative impacts to the cultural resources are specifically analyzed between each action alternative in EIS Section 3.5 (Cultural Resources). This includes consideration of reasonably foreseeable projects including other wind generation and transmission line projects. As stated in the Introduction, the EIS analyzes and discloses the potential environmental impacts of MVE's project and alternatives for BLM decision-making. As such, the EIS provides sufficient information to understand the basis for that decision-making and is not intended to provide extensive or exhaustive detail, or to include additional new studies such as intensive field survey. The BLM is developing a PA to complete the Section 106 process, which would include additional cultural resources identification efforts (e.g., field survey) prior to construction beginning on the project and the also would require the resolution of adverse effects to historic properties (including cumulative adverse effects) under HPMPs. For more detail, refer to the draft PA (EIS Appendix 8 [Cultural Resources Programmatic Agreement]), which is a working document subject to revisions deemed necessary to address public concerns per public and consulting party comments.
11535-156	Steven Andersen	In the Final Environmental Assessments and Proposed Land Use Plan Amendments for Idaho sections of Gateway West, it was specifically contemplated that "construction … could lead to the establishment of a corridor in which other lines may be installed in the future. There is a potential that cumulative impacts to the visual settings for some cultural resources would occur due to the establishment of a corridor and the subsequent construction of additional transmission lines." As aptly noted in the B2H final EIS and Proposed LUP Amendments, "The B2H Project, in combination with proposed wind facilities and the B2H Project would result in relatively high cumulative impacts." The DEIS should be analyzed in conjunction with pending projects and known transmission lines in the area to evaluate certain key cumulative effects. There is no thoughtful analysis in the DEIS or discussion of how the proposed project would combine with these past, present and reasonably foreseeable future actions to contribute to cumulative impacts on a broad range of environmental resources including historic cultural resources, including critical viewsheds, and effects on EJ populations, wildfires, socioeconomics, habitat, air and the ecosystem. There are only brief references to other alternative energy projects in the area and alignment with existing transmission lines. The FEIS fails to enumerate the environmental effects of other projects or consider the interaction of multiple activities, which is required under a cumulative effects analysis.	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline.

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11598-32	Idaho Conservation League	Lessons learned from existing projects There are a myriad of existing wind and solar projects on private properties in Idaho. The lessons learned from these projects can help inform the location and design of Lava Ridge and other projects. The BLM and our State partners should be taking a comprehensive look at the issues related to these projects, particularly to see if they functioned as intended and if the impacts were as anticipated.	In preparation of the EIS, the BLM reviewed the U.S. Wind Turbine database (Hoen et. al. 2018; updated as recently as May 2023), including summarizing in Section 3.1 (Introduction and Methodology) the number of turbines within 30 miles of the project. The avian and bat cumulative analyses additionally evaluated numbers of turbines within bird conservation Region 9 and for bats the North American Desert Level 1 ecoregion. Where data were available/applicable for both avian and bat species from other facilities in the United States and Idaho, these were used within those EIS analyses to estimate fatalities from the project. Scoping, public comments on the draft EIS, and prior wind projects were used to inform the issues analyzed in detail and in brief within this EIS. Where information was publicly available or provided by MVE or cooperating agencies, the BLM evaluated these information in the EIS.
11603-2	Sheri Freemuth	ollowing my review of this particularly complex document, I submit that the BLM neglected to perform an adequate cumulative impact analysis. In particular, I did not find a clear presentation of past, present and reasonably foreseeable actions. Specifically the following actions are not adequately described or are missing: references to infrastructure related programs, local airport improvements/plans, the CAFE program and other agricultural endeavors, updated comprehensive and local transportation plans, modifications to urban and rural development patterns (past, present and future), within a broad area. Furthermore, the analysis of cumulative impacts is segmented by resource, when in fact the intent is to consider the impacts holistically, across disciplines. In this geographic area a variety of agencies, jurisdictions, and private entities and industries coexist; were their future plans adequately considered? The Minidoka NHS has already been challenged once by a proposed adjacent Confined Animal Feeding Operation on adjacent private land; what would be the cumulative impact to the visitor experience of a nationally significant resource, and visitor attraction, if a CAFO (routinely permitted in Jerome County) were to occur in combination with Lava Ridge? In short, did the EIS preparers include the use of trends information, interagency plans, and private development potential within the region to determine the combined effects of past, present, and future actions across the full and spectrum of NEPA resources?	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline. RFFAs are defined and described in Section 3.1.1 (Existing and Future Trends and Actions). All of the RFFAs that meet this definition and for which information is publicly available are described in this section and considered in the analysis. No CAROs are reasonably foreseeable.
11618-1	Bif Brigman	Why are you not addressing issues of the cumulative impacts from this and other projects? Why do you allow this shady and biased business of these billion dollar for profit companies not having to address any of the TOTAL impacts from their projects like they aren't connected to each other?	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline.
11667-9	Alisa Bowman	Concern: Damage to the ecology The land would be disturbed by hundreds of miles of roads, dust pollution, and the cumulative destructive activity for the construction of these machines.	The effects of roads and dust on various biological resources are described in Sections 3.3 (Avian and Bat), 3.11.1 (Pollinators), 3.13.1 (Soils), 3.15.1 (Native Upland Vegetation Communities), 3.17 (Water and Wetland Resources), and 3.18 (Wildlife). Cumulative effects are described in the Cumulative Impacts sections of those resource chapters.
11687-2	Robert Nielson, Diana Nielson	How many 500KV lines can fit on the ROW across BLM land and Private lands? What about the Minidoka National Historical Sites view? And Private land owners that do not want 3 transmission lines across their property? If all 3 will fit they will open the door wider for more Green Energy Projects on private and public land due to the electric transmission lines in Idaho are deregulated. If a transmission line has the capacity for more Electricity than it is carrying, it can not refuse the of wheeling of power from other providers. The public lands are to be multi use, not for abuse and destruction of open spaces necessary for the sustainability of wildlife, recreation and protein source production from grazing and hunting.	Transmission lines and electrical infrastructure are sited to minimize impacts and thus are typically required to first use areas that are already impacted rather than develop land without any disturbance. Thus, multiple lines may run in the same corridor. See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
11740-4	Logan Dimond	negative effects that need to be considered and addressed. These may include impacts on wildlife, visual and noise impacts on local communities, potential impacts on human health, changes to local economies and communities, and concerns about manufacturing and disposal processes. It is essential to carefully plan and manage wind energy projects, taking into account their negative effects. Additionally, ongoing research and monitoring are needed to better understand the negative impacts of windmills.	The effects of the project on wildlife are described in Section 3.18 (Wildlife), on visual resources in Section 3.16 (Visual Resources), on noise in the various resource sections where there would be sensitive receptors, on human health in EIS Appendix 3 (Issues Analyzed in Brief), and on local economies in Sections 3.6.2 (Community Services, Employment, and Housing Availability), 3.6.3 (Local and Regional Economy), and 3.9.1 (Grazing Allotments and Range Socioeconomics). Waste is addressed in EIS Appendix 3.
11808-4	Jon Ochi	One of the requirements of the National Environmental Policy Act (NEPA) is the requirement to consider the cumulative impacts of a proposed action the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non- Federal) or person undertakes such other actions (40 CFR ~ 1508.7). An obvious cumulative effect would be other similar projects in the vicinity of the project being studied. Here are projects in the immediate (with 30 miles) vicinity of LRWP: Other Wind Projects: 1. Taurus Wind: 1500 MW, located immediately west of LRWP 2. Salmon Falls Wind: 800 MW, located 30 miles south of LRWP Other Solar Projects: 1. Invenergy Gem Vale Facility: 500 MW (guesstimate based on 3,500 acre footprint, located east of US 93, just north of the Midpoint Substation and south of Shoshone, Idaho 2. Two Longroad Energy Facilities: 1000 MW combined produced by the two facilities, located east of US 93 just south of the Midpoint Substation and north of Twin Falls [...] It is possible that losses of bats from LRWP may not trigger Endangered Species Act (ESA) protections. But under the doctrine of cumulative effects, the ESA protections would be much more likely to be triggered if there are three wind projects and three solar projects all within 30 miles proximity. Maximum avian mortalities from three wind projects are projected to be 30,000 to 51,000 mortalities per year. The additional deaths from the three solar projects cannot be determined with currently available	The wind and solar projects referenced in the comment are described in EIS Section 3.1.1 (Existing and Future Trends and Actions) and analyzed in the Cumulative Impacts sections in EIS Chapter 3 (Affected Environment and Impacts) as appropriate. There are no ESA-listed bats or other ESA-listed species that occur in the siting corridors. Section 7 consultation would be required if any bats (other species occurring in the siting corridors) become listed in the future. NEPA documents must disclose cumulative effects, but there is no requirement that similar but independent projects be grouped together in a single NEPA document.

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		studies. In a similar fashion, more damage to ecosystems will occur with the addition of three more wind projects and three more solar projects as being “reasonably foreseeable future actions.” According to NEPA law, it is unacceptable to treat each project as a discrete, unconnected event. The doctrine of cumulative effects was intended to counteract case by case actions. In NEPA law one must consider that cutting one tree at a time still results in the loss of the forest.	
11978-4	Magic Valley Energy, LLC	Section 3.1.1 – Existing and Future Trends and Actions 5. MVE Comment: As stated in the DEIS: “the existing and future trends and actions should include reasonably foreseeably actions that have existing decisions, funding, formal proposals, or are highly probable.” To this extent, the FEIS should include in the analysis the potential for reasonably foreseeable private land actions in the analysis area that could have cumulative impacts. This notion should be applied globally throughout the ‘existing and future trends and actions’ sections of the FEIS. For instance, Section 3.8.1.1.6 (Land Use and Realty) should include foreseeable actions of adjacent landowners tying into electrical infrastructure through privately owned wind turbines. Similarly, Section 3.16 (Visual Resources) includes subsections, such as shadow flicker in Section 3.16.3.2.6, where the cumulative impacts should evaluate the possibility of private landowners tying into electrical infrastructure if landowners desire to do so. The current language in Section 3.16.3.2.6 could be read as contradictory to this possibility.	Information about private land actions are typically not publicly available. This was clarified in EIS Section 3.1.1 (Existing and Future Trends and Actions).
11978-5	Magic Valley Energy, LLC	Chapter 3 Section 3.1.1 – Existing and Future Trends and Actions ... MVE Comment: The FEIS should follow the Council on Environmental Quality (CEQ) regulation- based terminology for a more cohesive document. For example, the DEIS introduces the notion of “trends” where that word is not used in the regulatory definition of effects or impacts. Further, Section 3.1 states impacts are “reasonable changes to the affected environment” where it should say “reasonably foreseeable changes to the affected environment” to be consistent with the definition of impacts in CEQ’s regulations (40 C.F.R. § 1608.1(g)).	Assumed the commenter was referring to the 40 CFR 1508.1(g)(3) definition for cumulative effects. In the current and proposed CEQ NEPA Implementing Regulations (as of July 2023), 40 CFR 1502.15(a) and (b) require evaluation of “reasonably foreseeable environmental trends and planned actions in the area”; this EIS follows these regulations. Also see response to comment 12976-15 (see in Table A-3gg, Cumulative Effects).
11979-1	Louisa Gauger	One last thing, we are aware that there are 3 other projects waiting in the wings to be presented if this one is approved. Personally speaking, I do not want to live in a forest of wind farms, that will destroy not only our land, it detrimentally affects human health as well.	Reasonably foreseeable wind and solar projects in the area are listed in Section 3.1.1 (Existing and Future Trends and Actions) and analyzed in the EIS.
12307-3	Dean Dimond	No information generated in this document indicates a full interdisciplinary analysis of even the separate areas of concern identified as to their cumulative impacts to the project area and upon the people living in the immediate area and to the American people. This is a deficiency that only a Supplemental draft EIS can possibly address.	See response to comment 11491-6 (see in Table A-3gg, Cumulative Effects).
12307-7	Dean Dimond	- In February of 2023, the BLM sent out letters to counties and others in five states regarding the expansion of the Western Solar Plan. This programmatic EIS will expand their Solar Plan in those five additional western states. With the obvious lack of cumulative impact analysis of existing energy resource development and the addition of solar projects, this Lava Ridge DEIS is premature. The Western Solar Plan will require a cumulative effects analysis of both solar and wind projects on federal BLM lands. Without this Programmatic EIS completed for solar and with only 2 more years before a new programmatic EIS is required for BLM Wind Development Planning (per this Lava Ridge DEIS), the Lava Ridge Project Supplemental EIS will need to be tabled until the Western Solar Plan NEPA is completed. The information contained in the BLM Wind Plan is not current and expires in 2025. The “NO ACTION” alternative for the Lava Ridge Wind Project must be chosen until the BLM can coordinate their planning efforts for their Western Solar Plan with the Wind Plan for both effective and efficient transparent planning, public involvement, county, state and tribal and NEPA on federal lands.	The BLM is preparing a programmatic EIS for wind and solar energy that will address cumulative impacts. Although it will not be ready before publication of the Lava Ridge Wind Project EIS, the project is being considered in the programmatic EIS.
12455-2	Diana Nielson	The easements for SWIP Line North have not been completed at this time. The approval of Lava Ridge would be putting the cart before the horse without the means for the power to be delivered to California Independent System Operator aka CAISO. If Lava Ridge is to be approved and not able to start construction, they will need to stockpile supplies needed to qualify by the deadline for the Tax Incentives that have been increased and dates extended. One of the issues is not all of the ROW easements are approved across private land. Another issue is the transmission line from Cedar Hill to Midpoint is part of the Gateway West Segment. Who has been approved for this BLM easement shared with Idaho Power? Is CAISO aware of this? If push comes to shove who will be dominate over the ROW. Today I watched a presentation from Idaho Power, Rocky Mountain Power and PacifiCorp in a Jerome County Planners Meeting. How many 500KV lines can fit on the ROW across BLM land and Private lands? What about the Minidoka National Historical Sites view? And Private land owners that do not want 3 transmission lines across their property? If all 3 will fit they will open the door wider for more Green Energy Projects on private and public land due to the electric transmission lines in Idaho are deregulated. If a transmission line has the capacity for more Electricity than it is carrying, it can not refuse the of wheeling of power from other providers.	See response to comment 11687-2 (see in Table A-3gg, Cumulative Effects). See Section 3.16 (Visual Resources) for disclosure of potential visual resources impacts from the project.
12476-2	Rebecca Kenison	In addition, other projects are being planned in the vicinity of Minidoka. DEIS does not address the cumulative effects of those other planned projects. There are other options for placement of the Lava Ridge project. The need for this project in this location has not been established	Other reasonably foreseeable projects in the project area for which information is publicly available are described in Section 3.1.1 (Existing and Future Trends and Actions), and evaluated throughout the EIS in the Cumulative Impacts sections. BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM’s purpose and need for action arises from the BLM’s responsibility under FLPMA to respond to a ROW application requesting authorized use

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			of public lands for a specific type of renewable energy development. Technical and economic feasibility of wind energy projects require meeting the correct combination of core siting requirements.
12859-46	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Failure to conduct inventory and monitoring. BLM did not comply with its own guidance to conduct inventories and monitoring to identify trends and emerging issues during plan evaluations that are supposed to occur every five years.273 As noted in the BLM Instruction Memorandum 2023-013: BLM state offices should ensure that inventories used to obtain information and data on the relevance and importance of values, resources, systems or processes, and natural hazards (MS- 1613.21(B)) are kept current consistent with section 201(a) of FLPMA “so as to reflect changes in conditions and to identify new and emerging resource and other values” (43 USC 1711(a)). Inventories and subsequent monitoring should be performed and updated on intervals appropriate to the resource value sensitivity to ensure data are available to identify trends and emerging issues during the plan evaluations that occur every 5 years (43 CFR 1610.4-9; MS-1613.63; Handbook- 1601-1, Land Use Planning, rel. 1-1693)	The BLM is responding to an application for a wind generation facility. Since March 2022, the BLM Idaho has been systematically completing LUP evaluations by district. LUP evaluations for the Twin Falls District are currently underway in accordance with 43 CFR 1610.4-9, with expected completion in the first quarter of 2024. Additional information about Idaho BLM LUP status can be obtained here: https://www.blm.gov/programs/planning-and-nepa/plans-in-development/idaho.
12934-6	Rob Thornberry; Theodore Roosevelt Conservation Partnership	Consider cumulative effects to private land owners. Although the DEIS outlines the project’s clear threat of habitat fragmentation to the long-term viability of pronghorn in analysis area, it does not consider the potential effects of displacing pronghorn to the private ground of nearby agricultural producers. Idaho political officials have a history of solving depredation concerns by forcing IDFG to thin pronghorn populations, and the TRCP is concerned that habitat loss in the area, combined with unfriendly depredation politics, could further damage the area’s pronghorn population. The TRCP encourages the BLM to consider the ramifications of wind power development moving pronghorn from finite winter habitat and pushing them on nearby private ground.	See response to comment 13006-18 (see in Table A-3aa, Wildlife, including Big Game).
12976-15	James Komadina	E. Direct and Indirect Effects As discussed in Section IV(A), agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information. As with any NEPA review, the rule of reason should guide the agency's analysis and the level of effort can be proportionate to the scale of the net GHG effects and whether net effects are positive or negative, with actions resulting in very few or an overall reduction in GHG emissions generally requiring less detailed analysis than actions with large emissions." b. Throughout the DEIS, numerous other renewable energy projects are described. Specifically on page 3-6 these are: i. "The BLM Twin Falls District Office has received additional ROW applications for other wind and solar development projects. One of the proposed projects, Taurus Wind, would be immediately west of Lava Ridge (potentially within 1 mile) and be of a similar size and scale (1,500 MW). Another proposed wind project, Salmon Falls Wind (800 MW), would be located approximately 30 miles south of Lava Ridge. Three solar facilities are also proposed adjacent to the siting corridors. The Invenergy Gem Vale facility would cover approximately 3,500 acres on the east side of U.S. 93, just north of the Midpoint Substation. Two Longroad Energy facilities would cover a total of 6,800 acres (producing roughly a combined 1,000 MW)just east ofU.S. 93 and south of(connecting to) the Midpoint Substation." 11. The spatial relationship of several projects to this DEIS are depicted in Figure 3.5-2. 111. The socio-economic study, Black, G., and S. Peterson. 2020. Econonuc and Fiscal Impacts Report: Two Proposed Southern Idaho Wind/arms and the SWIP-North Transnussion Line in Southern Idaho and Eastern Nevada, discloses numerous projects to be constructed in Idaho and Nevada linked with the Lava Ridge Project. 1v. The DEIS concludes the following in 3.16.1.2.6: "A project like this, where the project elements being introduced are not currently found in the existing landscape would set the stage for similar types of proiects and development to occur within the area." (Emphasis added). v. 40 CFR 1508.1 (g) and 40 CFR 1508.1 (g)(l) provide the following definitions applicable to this DEIS: 1. (g) Effects or impacts means changes to the human environment from the proposed action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including those effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. 2. (1) Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic (such as the effects on employment), social, or health effects. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial. v1. Other recent NEPA compliant EIS reviews have addressed the Cumulative Effects aspect of a proposed action: Resolution Copper final EIS I Resolution Copper Project and Land Exchange Environmental Impact Statement (resolutionmineeis.us) Resolution Copper's EIS, Chapter 4 Cumulative Effects notes: "CEQ regulations in effect for this FEIS define a cumulative impact as one that 'results from the incremental impact of the action when added to other past, present, and reasonably foreseeable actions, regardless of what agency (Federal or non Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time' (40 CFR 1508.7). Cumulative impacts are the combination of impacts from • the proposed action or alternatives • other past or present actions • reasonably foreseeable future actions." vn. COMMENT: This DEIS and POD are silent on the matters of Cumulative Effects which are reasonably foreseeable and for which, public Open Houses have been held in the greater Twin Falls area. The impacts of the future projects must be included in this DEIS to advise the public fully of impacts of President Biden's EO	The EIS introduces past, present, and reasonably foreseeable trends and actions in Section 3.1 (Introduction and Methodology). Then each section accounts for these trends and actions in the Affected Environment and No Action Alternative sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how reasonably foreseeable trends and actions would exacerbate, compound, or offset the effects of the project on the environmental baseline. See also analysis in EIS Section 3.4 (Climate and Greenhouse Gases) and response to comment 11978-5 (see in Table A-3gg, Cumulative Effects).

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		14008 decree which "set a renewable energy goal to provide 25 gigawatts (GW) of onshore renewable energy on DOI lands by 2025."	
12982-17	Jerry Taylor	The scope and frequency of these types of wind projects have increased considerably in recent years, and to meet the current administration's stated green energy goals will have to increase exponentially in a very short time. Consequently, the cumulative environmental impacts from these projects will increase at, or exceed, the rate of construction. The DEIS must analyze this loss of habitat and the direct impacts of species "take" and cumulative impacts in a much broader context, in order to understand and disclose to the decision makers and the public how significant this particular loss really is. How many wind projects are in operation within sage brush ecosystems in the Inter Mountain West, within Idaho, the Great Basin, the Columbia basin, and the Snake River Basin now? What are the kill rates of each, for federally protected avian species and others? How much habitat has been lost or is threatened? How much is expected to be lost overall? What are the cumulative impacts, considering all that has been done and what is planned?	Impacts to avian habitat are disclosed in EIS Appendix 3 (Issues Analyzed in Brief); see AIB-1. The potential for cumulative impacts to avian and bat species from multiple wind energy facilities across the landscape was specifically considered when determining the appropriate analysis area for bat populations (EPA North American Deserts Level I ecoregion; see EIS Section 3.3.1 [Bat Populations and Roosting Habitat]) and avian populations (BCR 9; see EIS Section 3.3.2 [Avian Populations]). Both the avian and bat population analyses examined fatality rates at multiple spatial scales and recognized that the vulnerability of specific avian and bat species to wind energy development is due to the cumulative nature of fatalities from numerous individual wind energy facilities throughout these species' ranges. Thus, even though none of the action alternatives are likely to have significant impacts on the population of any avian or bat species, a robust mitigation framework for avian and bat species has been developed in acknowledgement of the fact that each individual wind energy facility will have to reduce its overall contribution to cumulative impacts on avian and bat populations to prevent the declines of the most vulnerable species. Specifically, a TAC will be created (additional measure mm) that will be responsible for evaluating the data gathered during postconstruction avian and bat fatality monitoring (applicant-committed measure 150; additional measure u) and, if thresholds for adaptive management are triggered, recommending appropriate adaptive management measures including curtailment (applicant-committed measure 158; additional measures w and y) to reduce fatalities. Additional monitoring would be required to assess the effectiveness of these adaptive management measures and determine whether compensatory mitigation measure are warranted. See EIS Appendix 4 (Mitigation) for a complete list of required mitigation measures.
12988-8	Melody Asher	DEIS 3.3.2.1.3 EXISTING AND FUTURE TRENDS AND ACTIONS Your DEIS says "Existing and future trends and actions have influenced and will continue to influence bird populations in the analysis area through habitat disturbance, introduction of invasive species, or conversion of open space to agriculture or rural residential, particularly where those actions occur in suitable habitats (shrublands, rangelands, agricultural areas, and rocky outcrops) for bird species and their prey." This is just another cumulative impact to our ecosystem and the birds/mammals. This says to me that we need a state/region wide plan to decide where/how much cumulative effect from these proposed wind power/solar power developments that the environment and all the flora/fauna can handle and still have any semblance of any normal ecosystems.	See the cumulative impact analyses within each of the Chapter 3 biological sections. Potential cumulative impacts were evaluated in this EIS from existing and future trends and actions, and when combined with the project, must overlap temporally and spatially. For this reason, each Chapter 3 biological section defines an analysis area within which project and cumulative impacts are evaluated. Also see response to comment 3256-1 (see in Table A-3gg, Cumulative Effects).
13006-17	Leon Smith	8) Recommend consider cumulative impacts from additional proposed wind, solar, and battery projects in the region.	Reasonably foreseeable wind and solar projects in the area are listed in Section 3.1.1 (Existing and Future Trends and Actions) and analyzed in the EIS Cumulative Impacts sections.
2930-3	Regina Smith	400 wind turbines will certainly change fire suppression tactics in this area. I did not see a cumulative impact discussion on this topic but multiplied by other projects of a similar scope and size could impede large areas during fire suppression. I have seen the results of some 8000 homes destroyed in the Santa Rosa area (California).	Section 3.7.1.2.7 (Cumulative Impacts) describes the cumulative impacts of the project and other RFFAs and trends on fire and fuels management.
3256-1	Regina Smith	If one operation is constructed where will the limit be for cumulative impacts?	The EIS explains in Section 3.1 (Introduction and Methodology) the RFFAs evaluated within this EIS. The BLM is also preparing a programmatic EIS for solar energy that will evaluate cumulative impacts for the region, although it will not be completed before publication of the final EIS.
3256-5	Regina Smith	More study on cumulative impacts needs to be put into this analysis before we start an irreversible trend.	See response to comment 3256-1 (see in Table A-3gg, Cumulative Effects).
3256-6	Regina Smith	All in all The impacts anticipated;·existing and future trends, cumulative impacts and compensatory mitigation sections are glossed over.	The EIS accounts for past and present projects and trends in the Affected Environment sections since these actions and trends are currently affecting resources and contribute to the environmental baseline. The Cumulative Impacts sections describe how RFFAs and trends would exacerbate or compound the effects of the project on the environmental baseline.
4768-1	Regina Smith	I am trying to review and make comments on this draft EIS. On page 3-6 there are multiple ROW applications for similar wind and solar projects mentioned. I would like to know if there is one map showing the projects listed. I have not seen much about the Cumulative Impacts of all these projects together. For instance the Taurus wind project is adjacent to the Lava Ridge project. What are the cumulative impacts of multiple projects of similar size and scope? Twin Falls may be outside of the Lava Ridge project area but may be surrounded by multiple projects. There's no analysis of the impacts to Twin Falls or other surrounding communities. In addition sage grouse habitat may be affected by the Lava Ridge project but what will the impacts from numerous projects? If the disturbance during construction causes the wildlife to move out of the immediate area where will they move to? This will affect the hunting resources, recreational resources, cultural resources, OHV and visual resources. I understand that we are mainly analyzing the Lava Ridge project however if this is approved that will set a precedent for other projects. The long-term effects could be extremely overreaching.	Figure 3.1.1 (Existing and future trends and actions near the siting corridors) provides the locations of the RFFAs analyzed in the EIS including other wind projects. The cumulative effects of these RFFAs combined with the project are described in the Cumulative Impacts sections throughout EIS Chapter 3.
6913-11	Public Comments Canyon Crest Events Center	They also know nothing about the line, the transmission line that's going to go to Las Vegas, Nevada. I'm not sure the exact mileage, but it's probably at least an eight-hour drive from here, maybe more, a long way, and that power line is not even part of this study. It probably doesn't kill eagles but it impacts lots of acreage all the way to Vegas. Then from Vegas, a big hub for electricity, part of the national network, it's going to be shipped to California from there.	Reasonably foreseeable future projects in the area are listed in Section 3.1.1 (Existing and Future Trends and Actions) and evaluated in the Cumulative Impacts sections of Chapter 3.

Comment ID	Commenter	Public Comment	Response to Comment
7338-1	Matt F.	Please accept my comment regarding the Lava Ridge Wind Project EIS as it relates to the cumulative environmental impact from this project and others currently in the approval process pipeline. It is clear that BLM's long term planning vision involves multiple wind and solar projects blanketing southern Idaho. BLM needs to begin taking into account the concept of cumulative effect. Stated simply: while the impact in a particular area of one project may be minimal, the total impact across all projects in all areas could, and likely will be, devastating to the environment, people, property and businesses. BLM should develop some type of impound account which all projects must contribute funds to such that when the negative impacts become so large, the funds can be used to mitigate damage or to pay out injured parties. Further, if BLM ascertains that the cumulative effect of the entirety of planned projects would lead to negative impacts so great that a project would be denied, it should begin the denials in the beginning with the first project, not at the end after the damage has already been done. This would stop the damage from happening in the first place, rather than waiting until irreversible damage has been done to the region. For example: one project might not result in substantial declines in the Greater Sage Grouse population. However, if all of the projects were to be approved, they could reasonably be assumed to have a devastating effect on the GRSG population. It would be irresponsible for BLM to approve the projects knowing full well what would happen. So rather than wait until the end, after the damage has been done, the projects should be denied from the beginning such that the cumulative effect never comes to be. This reasoning could be applied to impacts on human systems as well, such as when ascertaining the cumulative negative impacts to airports and fire fighting ability.	MVE would be required to have a reclamation bond and would be held to BLM-approved reclamation success criteria. The BLM is preparing a programmatic EIS for wind and solar energy that will address cumulative impacts for the region. Though it will not be ready before publication of the EIS, the Lava Ridge Wind Project is being considered in the programmatic EIS. Cumulative impacts to sage-grouse are described in Section 3.3.4.2.7.
8068-2	Richard Dinges	Chapter 3.11 discusses the effect of the wind turbines on the population of pollinators and insects. In 3.11.1.2.2 under "Displacement, Injury, or Mortality" heading and third paragraph the following is stated: "Decline of insect populations may also diminish their ecosystem function, such as pollination. Declines in pollinators can thus reduce the ability for plants to reproduce and maintain native vegetation community components." Although it is recognized that a diminished insect population will diminish their ecosystem function, the full extent of what that entails is not addressed. Reference to maintaining native vegetation community components could vaguely refer to providing food for wildlife in the project area. It does not address the effect on cow-calf cattle grazing in the project area. The project is sited on many traditional grazing allotments. What remains of these allotments would be impacted by this expected loss of pollinators in that a loss of or degradation of the native vegetation means less pounds gained by the calves, loss of body score on the mother cows and more cows not breeding back. This will result in an economic loss for the cattlemen compared to the situation pre project. Also,the Lava Ridge project abuts and partially encompasses private property, the majority being irrigated farm land. A wide variety of crops are grown on these properties. Some of these crops require pollination to produce a yield. This aspect of the "ecosystem function" has not been addressed in this Chapter. If the crop is not fully pollinated, yield is reduced and the grower suffers a lower than expected return. He suffers an economic loss. The tv ads that have been aired by the developers of this project have touted the great economic benefit that this project will bring to the Magic Valley. Explain this to the cattleman and crop grower.	Although all action alternatives would impact pollinators to some degree, there is currently no evidence that direct mortality from wind turbine collisions poses a major threat to insect populations (Arcadis Belgium 2020). Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but in none of these cases has a reduction in crop productivity or yields due to pollinator declines been documented. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that direct mortality of pollinators and other insects from collisions with operational wind turbines would have negative economic consequences for the local agricultural economy. Arcadis Belgium. 2020. Business and nature working together: action by the energy sector to protect wild pollinators. Technical guidance prepared by Arcadis Belgium for the European Commission under contract No. 07.0202/2018/795538/SER/ENV.D.2 “Technical support related to the implementation of the EU Pollinators Initiative.” Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
8074-4	Richard Dinges	Chapter 3.3.2 in the Lava Ridge Environmental Impact Statement (EIS) discusses the probable number of birds that will be killed by collisions with the turbine blades. One aspect of the mortality of the birds that is not discussed, is how these deaths affect the overall ecosystem. It is a given fact that the bird's main diet are insects. When the bird population decreases, the insect population will increase. The Lava Ridge project abuts and in some cases partially encloses private property. In some cases this ground is irrigated crop land, and many different crops are grown on it. There are insects which can damage some of these crops. With a decreased bird population, it can be expected to see the detrimental insect population increase. The grower of the crop then is faced with a reduced yield or must apply chemical sprays to control the insects to achieve his yield goal. In both cases, the net result is less income from either a lower yield or increased input costs due to purchased chemicals. The TV ads being run to tout this project exclaim how this wind farm is going to bring economic benefits to the whole Magic Valley. Explain that to the grower who experiences a lower net profit. I believe that a more comprehensive review of the effects this project will have on the bird population and its effect on the ecosystem must be made.	Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but in none of these cases has a reduction in crop productivity or yields due to pollinator declines been documented. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that direct mortality of pollinators and other insects from collisions with operational wind turbines would have negative economic consequences for the local agricultural economy. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
8129-4	Richard Dinges	Chapter 3.3.1 in the Lava Ridge Environmental Impact Statement (EIS) discusses the probable number of bats that will be killed by collisions with the turbine blades or by the barotrauma associated with the vortecies from the blades. One aspect of the mortality of the bats that is not discussed, is how these deaths affect the overall	Approximately half of all existing wind energy turbines are located in cultivated cropland (Harrison-Atlas et al. 2022); concerns have been raised that continued conversion of farmland to wind energy development can reduce overall agricultural output (Harrison-Atlas et al. 2022; Mills 2015; Morris and Blekkenhorst 2017), but in

Comment ID	Commenter	Public Comment	Response to Comment
		ecosystem. It is a given fact that the bat's main diet are insects. When the bat population decreases, the insect population will increase. The Lava Ridge project abuts and in some cases partially encloses private property. In some cases this ground is irrigated crop land, and many different crops are grown on it. There are insects which can damage some of these crops. With a decreased bat population, it can be expected to see the detrimental insect population increase. The grower of the crop then is faced with a reduced yield or must apply chemical sprays to control the insects to achieve his yield goal. In both cases, the net result is less income from either a lower yield or increased input costs due to purchased chemicals. The TV ads being run to tout this project exclaim how this wind farm is going to bring economic benefits to the whole Magic Valley. Explain that to the grower who experiences a lower net profit. I believe that a more comprehensive review of the effects this project will have on the bat population and its effect on the ecosystem must be made.	none of these cases has a reduction in crop productivity or yields due to pollinator declines been documented. Given the prevalence of wind energy turbines in agricultural lands and the lack of documented declines in crop productivity in the vicinity of these turbines, it is unlikely that that direct mortality of pollinators and other insects from collisions with operational wind turbines would have negative economic consequences for the local agricultural economy. Harrison-Atlas, D., A. Lopez, and E. Lantz. 2022. Dynamic land use implications of rapidly expanding and evolving wind power deployment. *Environmental Research Letters* 17(4):17 044064. Available at: https://iopscience.iop.org/article/10.1088/1748-9326/ac5f2c/meta. Accessed December 29, 2023. Mills, S.B. 2015. Preserving Agriculture through Wind Energy Development: A Study of the Social, Economic, and Land Use Effects of Windfarms on Rural Landowners and Their Communities. Ph.D. dissertation, University of Michigan. Available at: https://deepblue.lib.umich.edu/bitstream/handle/2027.42/111508/sbmills_1.pdf. Accessed December 29, 2023. Morris, D.W., and N. Blekkenhorst. 2017. Wind energy versus sustainable agriculture: An Ontario perspective. *Journal of Rural and Community Development* 12(1):24-34. Available at: https://dmorris.lakeheadu.ca/113.pdf. Accessed December 29, 2023.
8624-3	Public Comments via Remote Video	The question is, is this the right place to do that? We have failed to consider the cumulative impacts from having projects at Salmon Falls, Lava Ridge, Arco, Idaho, as well as solar projects, and the cumulative damage to wildlife and the overall Idaho experience that many of us value very highly.	Reasonably foreseeable wind and solar projects in the area are listed in Section 3.1.1 (Existing and Future Trends and Actions) and analyzed in the Cumulative Impacts sections of Chapter 3. The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. Technical and economic feasibility of wind energy projects require meeting the correct combination of core siting requirements.

Decision Process

Table A-3hh. Decision Process

Comment ID	Commenter	Public Comment	Response to Comment
11204-11	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	The DEIS did not adequately address these issues. The DEIS continues to preclude the formulation of substantive site-specific comments when it makes admissions like: • “the exact location of infrastructure and activities within the siting corridors is unknown at this time” (DEIS, pgs. ES-vi and 2-2); • the “project’s final design and engineering would be completed after the BLM has issued a record of decision” (DEIS, pgs. ES-vi and 2-2); • the Project’s “final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer” (DEIS, pg. 2-2); • because “the exact location of project components is not yet known, beyond being located within the siting corridors, the acreage of work area and infrastructure disturbances are proportionally applied to the siting corridors” (DEIS, pg. 3-8); • the “exact location of overhead collector lines undetermined” (DEIS, pg. 3-117); and, • “the exact location of the groundwater wells would be determined during final design” (see DEIS, pg. 3-440). The lack of site-specific information within the DEIS regarding the exact location (and related timing) of infrastructure and activities within the siting corridors is problematic when many of the issues being analyzed (such as visual changes, the generation of noise, the potential for shadow flicker, and impacts to grazing practices) are highly dependent upon the exact location and engineering of the infrastructure and the timing of its installation and use. The request for site-specific concerns regarding potential impacts from the proposed Project is an impractical task when site-specific information is not yet available regarding the location and design of Project components and regarding the timing of their planning, construction, operation, and decommissioning. In fact, the ability for the Permittees to actually comment to the DEIS is effectively negated by such lack of location and timing specifics. This is because, absent such specifics, the Permittees cannot reasonably know the impacts upon their livestock operations during each of the four (4) different phases, i.e., construction, rehabilitation, operation, and decommissioning, and based thereon, know if it is even reasonably possible to maintain and sustain their current livestock operations during each of the phases. The lack of	As described in the EIS, turbines and associated project elements could be sited anywhere within the siting corridors. The Chapter 3 analysis assumes project siting (including for turbines) could occur anywhere within the corridors, and the EIS discloses potential impacts to the issues evaluated. In accordance with NEPA and the BLM NEPA Handbook, the analysis presented in the EIS provides a reasonable comparison of project alternatives. Additional site-specific coordination between the BLM, MVE, and grazing permittees would occur preconstruction, through construction, and during project operation and decommissioning. See also MVE (2023) and EIS Appendix 11 (Project Elements Common to All Action Alternatives) for additional project details.

Comment ID	Commenter	Public Comment	Response to Comment
		specifics as to location and timing unreasonably prejudices this entire process as against the Permittees and for the applicant, i.e., MVE, i.e., Wind Company.	
11491-34	Dean Dimond, Jennie Bateman	24. Need new info the on the ground scale —- the computer modeling level does not appear to be verified on the ground	MVE conducted a number of baseline resources to verify the results of desktop investigations and collect site-specific information necessary to inform the analysis in the EIS, as described throughout EIS Chapter 3 (Affected Environment and Impacts).
11534-5	Matt Arnold, William Eubanks	According to the DEIS, "BLM's purpose is to respond to MVE's application for a ROW grant to construct, operate and maintain, and decommission a wind energy facility on public lands in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies"; the "need" is defined as "aris[ing] from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy." DEIS at 1-1. In deciding whether to grant the ROW, BLM explains that it "will also consider a number of federal policies, including . . . [t]he policy expressed in 43 USC [§] 3004(b)," which "seek[s] to issue permits that, in total, authorize production of not less than 25 gigawatts of electricity from wind, solar, and geothermal energy projects by not later than 2025, through management of public lands and administration of Federal laws." Id. Apart from this single reference in its purpose-and-need statement, BLM fails to explain its purported consideration of and motivation by the nationwide policy codified at 43 U.S.C. § 3004(b). ... Given this Project's potential to permanently impair the Minidoka National Historic Site, "a nationally significant [historical] site . . . related to civil rights and liberties," DEIS at 3-155, 3-166, the population-level impacts to certain wildlife species, and the other significant impacts to affected resources, it is incumbent on BLM to explain in the FEIS how much nationwide progress has been made towards achieving the renewable-energy goal identified at 43 U.S.C. § 3004(b), and why this Project, specifically, is necessary to achieve that goal (compared, for example, to other BLM-administered lands where wind-energy infrastructure would threaten far less risk to affected resources). Such an explanation is critical for the public's understanding of how BLM seeks to balance its renewable-energy and Project-specific goals against its other codified duties, including the protection and promotion of historically significant properties like Minidoka, see, e.g., 54 U.S.C. § 300101 (espousing a national policy of prioritizing historical preservation of significant sites), and the conservation of migratory birds and other species of concern that reside in the Project area, see, e.g., 16 U.S.C. §§ 703-712 (prohibiting anyone from killing or otherwise "taking" migratory birds).	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-N. The BLM follows applicable laws, regulations, and policies that guide the preparation of the EIS and inform the evaluation of proposals like the project. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS and migratory birds to understand how the potential impacts relate to laws, regulations, and policies. See also response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
11556-1	Mark Menlove; The Nature Conservancy	The Conservancy urges the Bureau of Land Management to invest in rigorous decision-making processes, including engagement with local communities, and to proactively identify places that are best suited for renewable energy development. These actions could help us minimize negative impacts to nature and people and avoid local conflict, which has surrounded the project.	The BLM follows the laws, regulations, and policies to guide the preparation of the EIS and inform the evaluation of proposals like the Lave Ridge Wind Project. Throughout the perpetration of the EIS the BLM has used the mitigation hierarchy to identify measures and alternatives that would avoid and minimize potential impacts. The development of measures and alternatives have been informed by the robust suite of outreach efforts that the BLM facilitated throughout the preparation of the EIS. The BLM provided opportunities for input early on through coordination with stakeholders and cooperating agencies and incorporated input from the public throughout the preparation of the EIS. These outreach efforts have resulted in considering elements that have the potential to minimize adverse impacts.
12453-3	Alexia Deetz	The SWCA Environmental Consultants chosen by BLM to research and create this report are people invested in "climate change"remediation. Go and look at their website and see some of the Board of Directors and their "twitter" posts. SWCA utilizes desk surveys to back up statements they make. Most of the literature cited in Appendix 2 App 2-5 and Appendix 3 App 3-58 – App 3-65 is outdated and hearkens back as far as 1999. I only saw one that referenced Idaho. Based on outdated desk survey data and research not performed in southern Idaho this report states whether impacts to the BLM land are significant or not and what mitigation efforts would be needed. This is fraudulent, in my opinion, because there hasn't been any "real" local impact study. The "real information" to consider is the information provided by the people who live and work here. They have "real local expertise". In addition, there are no "studies" cited for the impact caused by either the size of the windmills planned for this project or the number of windmills to be built. I am not interested in putting our public land, aquifer and people at risk for an experiment. Furthermore, desk surveys are based on data gleaned from the internet. The data is analyzed and yields information for decision making. Data can be secondary or primary. Secondary data is most often available to researchers and is often produced by other researchers. The " Impact Statement" referenced above is primarily based on secondary data collection and analysis. The problems with secondary data are many. Such as reliability of the data, it is often difficult to ascertain whether the data has been tampered with, altered or is even truthful. There are restrictions for using secondary data. Secondary data does not always represent a continuous time interval of interest to researchers or may be missing some factual aspects and has scattered sources which makes them incomparable, or they may not be labeled adequately. Data may be outdated. There are technical challenges for data acquisition, not every researcher has the skill set for efficient acquisition of data from websites and data processing. Secondary data often requires long processing before relevant information can be extracted. Secondary data collection can be biased. I do not find "desk survey" research to support informed decision making, particularly the important decision to be made about the Lava Ridge Wind Project or any other projects on the horizon.	The BLM follows applicable laws, regulations, and policies that guide the preparation of the EIS and inform the evaluation of proposals like the Lava Ridge Wind Project. This includes making use of reliable existing data and resources to describe the existing conditions and inform the analysis of potential impacts. Throughout the preparation of the EIS, the BLM has obtained the relevant data and information needed to prepare the EIS. This information has come from project-specific surveys, publications and analytical documents prepared by cooperating agencies and other reliable resources, and from information supplied by individuals and stakeholder groups.
3230-5	Gary Carney	Among the few that I mentioned, there are many others. However, the overall theme is that there has been an extreme lack of diligence brought forward to make an informed decision. There are many other clean energy options that can be brought to light to help the delivery of electricity to those who will benefit, but this decision may have sever adverse effects on millions of citizens. This is an extremely large project and deserves proper due diligence that would require years to satisfy and cannot be underestimated. The Bureau of Land	The BLM is responding to MVE's application for a wind generation facility that connects to the Midpoint Substation or SWIP-N. The BLM follows applicable laws, regulations, and policies that guide the preparation of the EIS and inform the evaluation of proposals like the project. This includes making use of reliable existing data and resources to describe the existing conditions and inform the analysis of potential impacts. Throughout the preparation of the EIS, the BLM has obtained the relevant data and information needed to prepare the EIS.

Comment ID	Commenter	Public Comment	Response to Comment
		Management should require more inspections done that require a longer time period than what was given. The BLM should require non-bias 3rd Party ecologists, biologists, geologists, and other field professionals to study the project. These hires take much more time than what the BLM has granted. The timeframe given to us as locals was just enough to scratch the surface, and has brought the attention to those who have reached out to field experts in order to write letters like mine.	This information has come from project-specific surveys, publications and analytical documents prepared by cooperating agencies and other reliable resources, and information supplied by individuals and stakeholder groups.

Decision Process for National Park Service

Table A-3ii. Decision Process for National Park Service

Comment ID	Commenter	Public Comment	Response to Comment
11782-4	Ken Fitch	There are competing obligations and jurisdictions here, some of them legal and jurisdictional. NPS under the Organic Act has obligation to “conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” In terms of NPS evaluation, the adjacent actions would constitute an impairment, As a Cultural Resource Manager at a NPS unit once told me, “We are required to protect the items in our care not just for the next five years, but the next 500 years” and beyond.	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service), 11598-26 (see in Table A-3jj, Legal or Policy Compliance), and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11886-2	Sandra Eto	This land has gone through significant processes to acknowledge and protect the importance of the Minidoka NHS as part of the history of the US’ struggle as a democratic nation, one that is still little known to the Nation at large. The Foundation Document, prepared by the NPS, has identified the basis upon which planning and management of the Minidoka NHS has occurred. The NPS is the jurisdictional entity for managing the Minidoka NHS. It is current and relevant to the Lava Ridge proposed project, unlike the Monument RMP (1986). The Foundation Document must be recognized as the basis upon which impacts from the proposed project on the Minidoka NHS are evaluated. And NPS must be the agency at the table to speak for decisions being made that affect the Minidoka NHS (and the Oregon Trail), such as the non-physical APE. The NPS must be a concurring party to the PA and be included in any decision-making or discussions involving or affecting the Minidoka NHS.	The project is being proposed on public lands managed by the BLM. The location of project infrastructure would be located in areas adjacent to Minidoka NHS, a site managed by the NPS, but no portion of the project would be located on lands within the jurisdiction of the NPS. The NPS is a cooperating agency, and the BLM has worked with them closely to ensure the EIS evaluates potential impacts to the NPS units and associated resources. The NPS is also participating as a consulting party within the Section 106 process and has actively participated in the preparation of the PA that would stipulate the process necessary to comply with Section 106 obligations. The BLM has considered information in the Foundation Document (NPS 2016) prepared for Minidoka NHS; however, the Monument RMP (BLM 1986), as amended is the guiding land use plan for uses occurring on public lands managed by the BLM. The BLM has coordinated and taken into consideration extensive input from the NPS and has used that information to inform the analysis of potential impacts within the EIS. The line officers for the NPS units adjacent to the project area are not delegated the authority for decision related to the project and cannot legally make determinations or enter into agreements regarding the project and the associated PA.
12338-1	National Park Service	Topic #1 – Standalone Summary of Impacts to Minidoka NHS Global comment The NPS recommends that the Environmental Impact Statement (EIS) include a standalone section that summarizes the identified impacts on Minidoka National Historic Site (NHS) for each action alternative, in order to clearly identify impacts to the NPS ability to carry out its mission at Minidoka NHS. The draft EIS currently fragments the analysis of effects to the park in different sections of Chapter 3. Impacts to the Japanese American community and to the former Minidoka War Relocation Center are identified, without a clear indication of which effects accrue to Minidoka NHS. A stand-alone section would help the reader understand the totality of the project’s impacts to the park’s mission. The NPS also recommends the analysis include impacts to the park’s purposes, stated in legislation as interpreting “the story of the relocation of Japanese Americans during World War II to the Minidoka Relocation Center and other centers across the United States; the living conditions of the relocation centers; the work performed by the internees at the relocation centers; and the contributions to the United States military made by Japanese Americans who had been interned” (PL 110-229, Section 313). Minidoka NHS legislative purposes are implemented through planning documents, including its General Management Plan (GMP), a Foundation Document, and an Interpretive Plan. These documents all address interpretation and commemoration. The GMP and Foundation documents mention reflection and healing to different degrees. The statutorily required GMP, a publicly developed document, references that some commentors on the GMP believe that Minidoka NHS is a place of healing for former incarcerees and their descendants. The Foundation Document, an internally developed document, identifies healing and commemoration as fundamental values. The NPS can provide the park’s GMP, Foundation Document, and other planning and operational documents and, if requested, can assist in providing context for this section. The NPS makes this recommendation to ensure that the impacts of visible wind turbines to Minidoka NHS legislative interpretive mission are fully considered.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
9080-51	The Coalition to Protect America’s National Parks	B. National Park Service Organic Act of 1916, as amended58 – In contrast to the BLM’s “multiple use mandate” under FLPMA, the NPS-managed resources at Minidoka NHS are managed and protected under a separate statutory requirement, which is the “conservation mandate” of the NPS Organic Act of 1916 and	The project is proposed on public lands managed by the BLM. The location of project infrastructure would be located in areas adjacent to Minidoka NHS, a site managed by the NPS, but no portion of the project would be located on lands within the jurisdiction of the NPS. The NPS is a cooperating agency, and the BLM has

Comment ID	Commenter	Public Comment	Response to Comment
		subsequent amendments. The Organic Act established the fundamental purpose of units of the National Park System, which is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (54 USC § 100101(a)). Courts have consistently interpreted the Organic Act as giving conservation priority over use such that "when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant" (NPS Management Policies 2006 §1.4.3). In addition, as described under General Comment 10 above, under the NPS Organic Act, as amended, the Secretary of the Interior "has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system."	coordinated with the NPS to ensure the EIS evaluates potential impacts to the NPS units and associated resources. The NPS is also participating as a consulting party within the Section 106 process and has actively participated in the preparation of the PA that would specify the process necessary to comply with Section 106 obligations. The BLM additionally prepared Section 3.19 (Minidoka National Historic Site Interpretive Purpose) to disclose potential impacts to this NPS-managed property's legislated purpose.

Legal or Policy Compliance

Table A-3jj. Legal or Policy Compliance

Comment ID	Commenter	Public Comment	Response to Comment
11188-1	Clare Josaitis	Neither in the MVE's Plan of Development or in the DEIS, are the identities of MVE's participants disclosed. Per FLMPA 1976 (as amended), the BLM "shall require the applicant to disclose the identity of the participants in the entity." Who are the partners and shareholders involved in MVE?	FLPMA does provide the Secretary with the authority to require applicants to disclose the identity of the participants in the entity (partnership, corporation, association, or other business entity) when it is deemed necessary to a determination of whether or not a ROW grant shall be issued. This authority is provided to allow for the effective adjudication of MVE's legal authority to hold a ROW grant and is not provided in the EIS, as it is not relevant to the BLM's analysis and review of potential impacts that may result from the Proposed Action.
11188-2	Clare Josaitis	FLPMA states that "The Congress declares that it is the policy of the United States that - ... public lands not previously designated for any specific use and all existing classifications of public lands that were effected by executive action or statute before October 21, 1976, be reviewed in accordance with the provisions of this Act...". All the land within the project area has already in fact been designated for livestock grazing use through existing permitted allotments. Additionally, numerous other consumptive and non-consumptive uses currently take place in the project area. Implementation of the proposed action or any other identified action alternatives would directly and drastically usurp the existing designated allotments and associated grazing permits that have been in use by local cattle and sheep ranchers for decades. Congress has not exercised its constitutional authority to withdraw the lands in the project area from livestock use. Implementation of any of the action alternatives would effectively cause the termination of existing permitted livestock use. This is in conflict with the letter and spirit of FLPMA.	See responses to comments 11204-13 (see in Table A-3p, Livestock Grazing) and 11326-9 (see in Table A-3jj, Legal or Policy Compliance). The BLM considers the potential impacts to other valid existing uses on public lands, including permitted livestock grazing, in the EIS. See Section 3.8.1 (Land Use Authorizations), Section 3.9.1 (Grazing Allotments and Range Socioeconomic), and EIS Appendix 12 (Historical Livestock Actual Use and Utilization). If the project were to be authorized, other uses of public lands would not be precluded.
11188-4	Clare Josaitis	The 1986 Monument Resource Management Plan cited in the DEIS is antiquated and does not have any discussion of wind energy. So, to truly be in conformance with the management plan for the Monument Resource Area, the proposed project should not be authorized.	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).
11188-5	Clare Josaitis	According to the BLM's Final Programmatic Environmental Impact Statement for Wind Energy Development on BLM-Administered Lands in the Western United States (BLM 2005a), to which this DEIS tiers, the wind resource potential was measured by the DOE's National Renewable Energy Laboratory (NREL). According to the maps in Wind Energy EIS, the wind resource potential measured in the proposed project areas is "low". EPA.gov states that wind turbines are 20% to 40% efficient at converting wind into energy. Given the low wind resource rating and the inefficiency of wind turbines for producing energy, how can there be any justification in building these pseudo-green turbines?	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. MVE completed siting analysis and used the latest computer modeling to assist in their selection of the project area as a viable wind energy facility. MVE has also established meteorological stations to gather additional information on the wind resources within the project area.
11204-5	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	DEIS did not consider or assess the applicable land use planning.	EIS Appendix 2 provided a description of the project's conformance with the land use plan.
11204-8	Livestock Permittees within the Star Lake Allotment: Barbara Oneida, David Oneida, James Ritchie, William Shaw, Karma Posey, Justin Posey, Oralia Gergen, W. Alan Schroeder, William Arkoosh, Shawna McKay, Bryan McKay, Kevin Gergen	II. Land Use Plan violation: The applicable Land Use Plan (the 1986 Monument Resource Management Plan) was not amended by the 2005 ROD-Wind and does not authorize wind projects as amended. See 2021 Comments, pgs. 7-8. Summary: The DEIS needs to be revised to explain how the proposed Project can be authorized despite the fact that the 1986 Monument RMP was not amended by the 2005 ROD-Wind and the 1986 Monument RMP, as amended, does not authorize wind projects. The 2021 Comments stated that the applicable land use plan is the 1986 Monument RMP, as amended, by the following documents: • the Record of Decision dated August 20, 2003, relating to Land Tenure Adjustment and Areas of Critical Environmental Concern ("2003 ROD-Land Tenure"); • the Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region (including the Greater Sage-Grouse Sub-Regions of Idaho and S.W. Montana, Nevada and N.E. California, Oregon, and Utah) dated September 15, 2015 ("2015 ROD- ARMPA"); • Attachment I to the 2015 ROD-ARMPA dated September 15, 2015, relating to the Idaho and S.W. Montana	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).

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		Greater Sage-Grouse Resource Management Plan Amendment ("2015 Idaho ROD-ARMPA"); and • the Idaho Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment dated March 14, 2019 ("2019 Idaho ROD-ARMPA"), as reaffirmed by the Idaho Record of Decision for the Greater Sage-Grouse Supplemental Environmental Impact Statement dated December 30, 2020 ("2020 Idaho ROD-SEIS"). See 2021 Comments, pgs. 7-8. The 2021 Comments noted that, while there is some uncertainty whether the 2019 Idaho ROD-ARMPA is currently an applicable land use plan amendment because the 2019 Idaho ROD- ARMPA was enjoined from implementation by W. Watersheds Project v. Schneider, 417 F. Supp. 3d 1319 (D. Idaho 2019), "such court decision was issued before issuance of the 2020 Idaho ROD-SEIS." 2021 Comments, pg. 8. The 2021 Comments go on to note that even if the 2015 Idaho ROD-ARMPA and/or the 2019 Idaho ROD-ARMPA, as reaffirmed by the 2020 Idaho ROD-SEIS, are currently the applicable land use plan amendments, then the Permittees still don't find any explicit management direction for wind energy in the 1986 Monument RMP. See 2021 Comments, pg. 8. The 2021 Comments noted that the applicable Land Use Plan ("LUP"), i.e., the 1986 Monument Resource Management Plan, does not authorize wind projects. 2021 Comments, pg. 7. The 2021 Comments also noted that the 1986 Monument RMP was not amended by the 2005 ROD-Wind that resulted from the 2005 PEIS-Wind. 2021 Comments, pg. 8. The DEIS did not adequately address these issues. Under the heading "Conformance with Land Use Plans," the DEIS states that the applicable land use plan is the 1986 Monument RMP (BLM 1986), as amended, including the 2015 Idaho and Southern Montana Grater Sage-Grouse Approved Resource Management Plan Amendment (BLM 2015)." See DEIS, pgs. ES-v and 1-2. The DEIS admits that the 1986 Monument RMP was not amended by the 2005 ROD-Wind at pages 1-7 and 3-7 which report that "BLM (1986),[4] as amended, was excluded from being amended by BLM (2005b)."5 The DEIS attempts to excuse the fact that the 2005 ROD-Wind did not amend the 1986 Monument RMP by explaining that the exclusion of the 1986 Monument RMP from the LUPs that were amended by the 2005 ROD- Wind "could have been for a variety reasons, including that developable wind resources were not deemed present in the area managed by the SFO at that time, or that BLM (1986) was expected to be amended in the near term (and thus analysis [from the 2005 ROD-Wind] would be incorporated into BLM [1986])." The DEIS therefore concludes that even though the 1986 Monument RMP was not amended by the 2005 ROD-Wind, its associated Best Management Practices (BMPs) and 2005 PEIS-Wind analyses are "relevant for the Lava Ridge Wind EIS." However, such rationalization does not change the fact that the 1986 Monument RMP does not authorize wind projects and was not amended by the 2005 ROD-Wind. Given the lack of wind resource and development in the 1986 Monument RMP, the 1986 Monument RMP must be revised as per 43 C.F.R. § 1610.5-6, or alternatively, a land use plan amendment must be developed as per 43 C.F.R. § 1610.5-3(c), as a condition precedent to any consideration of the proposed Wind Project. While, as explained below in the next Section, the Permittees will acknowledge that the 2015 Idaho ROD-ARMPA and/ the 2019 Idaho ROD-ARMPA, as reaffirmed by the 2020 Idaho ROD-SEIS, considered and assessed wind development, such consideration and assessment was limited as specifically related to sage-grouse management, not as related to the consideration and assessment of all of the public lands and public land resources, including the multiple-uses, upon the public lands. Neither the 2015 Idaho ROD-ARMPA nor the 2019 Idaho ROD-ARMPA provide the factual or legal land use planning direction under 43 C.F.R. § 1610.5-3 to support the proposal and wind development generally upon the public lands.	
11274-1	Karen Schumacher	It seems the BLM has not followed federal law for Coordination, specifically 43 USE 1712(c)(9). This law states, "(9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." The BLM is required to follow Coordination laws in the Lava Ridge project as it is required to by both FLPMA and NEPA rules. Coordination is found in both of these laws, (42 U.S.C. 4331(b)), NEPA (42 U.S.C. 4331(b)), FLPMA (43 U.S. Code SS 1712(9)), and both state "shall" as mandates for Coordination. Until the BLM engages in Coordination and ensures consistency with local land use plans with ALL counties involved in this project, it cannot move forward and a No Action alternative must be the decision. In the 2005 BLM Wind Energy Development Program Record of Decision, there are protections for the cattle industry. On page A-2 it states, "wind energy projects shall be developed in a manner that will not prevent other land uses, including...livestock grazing, recreational use, and other ROW uses". It also states, "Additional areas of land may be excluded from wind energy development on the basis of findings of resource impacts that cannot be mitigated and/or conflict with existing and planned multiple-use activities or land use plans." Since the BLM has failed to initiate its responsibility for Coordination with local counties, and consistency with land use plans has not be determined, this project cannot move forward. The construction of the project conflicts with resource impacts for multiple use and grazing rights, as well as for up to 34 years, with reduction of allotments after that time. This violates the BLM's own policies. In addition, according to its Policies and Best Management Practices (BMPS), BLM wind energy projects "shall be developed in a manner that will not prevent other land uses, including...livestock grazing, recreational use, and other ROW uses (1-1)." During construction the Grazing Plan calls for the removal of allotments and AUMs which violates these	Coordination occurred as described in EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers) and included Jerome, Lincoln, and Minidoka Counties as cooperating agencies. Coordination with permittees began early in the evaluation of the project and incorporated permittees feedback. The draft EIS evaluates potential impacts to livestock grazing within Section 3.9 of the draft EIS, and the approval of the Proposed Action or other action alternatives would maintain other compatible uses, such as livestock grazing.

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		policies by preventing land use, along with recreational use, for years with eventual permanent loss of use. Based on this the BLM must select Alternative A, No Action. 43 USC 315b states holders of grazing permits "are entitled to participate in the use of the range". With this project, those entitlements are being taken away, a violation of the law. With this project land will not be available for grazing, a clear violation of federal law 43 CFR SS 4130.2(e)(1) The ongoing destruction of the land with temporary fencing that is then removed for fencing in another area causes a cumulative overall significant impact which violates 40 CFR 1508.27(b)(7). According to this law, breaking up these small areas does not diminish the significance of the cumulative damage. It also violates 40 CFR 1508.7 43 U.S. Code SS 1701 requires that the land will be managed in a manner that will provide food and habitat for domestic animals. The destruction of this land violates this law. 43 CFR SS 4130.2(e)(1) states that grazing permits that have been issued remain available for livestock grazing. This right to grazing is being removed by the project, another law violation. In the BLM Mitigation Handbook it states "wind energy projects shall be developed in a manner that will not prevent other land uses, including...livestock grazing..." This whole project violates the BLM's own Mitigation Handbook directives. Because of so many federal law violations, the BLM has no other choice than to pick Alternative A, NO ACTION.	
11326-9	Filip Camacho, Tasha Sorensen	The Idaho BLM Field Offices should also be proponents for being included in any programmatic efforts for wind and solar.3 Additionally, we support full-plan revisions and amending resource management plans in Idaho to address renewable energy developments more comprehensively including biodiversity and connectivity of intact landscapes. In this area, the Monument Resource Management Plan (RMP 1986)4 is outdated and pre-dates industrial-scale development of public lands. The RMP also does not include wildlife migrations or reference the significant avian populations in this region. Of note, the Monument RMP was omitted in the 2005 Wind Energy Development PEIS, which amended 52 BLM land use plans in Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming.	The December 2005 *Record of Decision for the Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments* states, "The decision is hereby made to implement a comprehensive Wind Energy Development Program to administer the development of wind energy resources on BLM-administered public lands in 11 western states: Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming. The decision establishes policies and best management practices (BMPs) for the administration of wind energy development activities and establishes minimum requirements for mitigation measures. The policies and BMPs were evaluated in the Final Wind Energy PEIS (BLM 2005a) and are included in Attachment A. With the decision to implement the Wind Energy Development Program, the BLM Interim Wind Energy Policy (BLM 2002) will be replaced by a new policy that incorporates the programmatic policies and BMPs evaluated in the PEIS. Elements of the Interim Policy addressing applications, authorizations, competitive interests, and due diligence will not be changed by the new program requirements. (emphasis added)" (BLM 2005b). In processing the application for the Lava Ridge Wind Energy Project the BLM follows the elements and the BMPs established by the December 2005 ROD and analyzed in the PEIS. The BLM recognizes that the use of these program elements and BMPs are not a requirement established by an amended land use plan but considers them as established guidance through policy. The BLM routinely reviews its land use plans and updates them, as necessary. Since the *Monument Resource Management Plan* (BLM 1986), as amended, was approved, it has been amended multiple times to provide direction on management actions and allocations related to the management of sage-grouse, designations of ROW corridors, analysis of geothermal leasing, designation of Areas of Critical Environmental Concern, fire and vegetation management, and identification of parcels available for land tenure adjustments. The action alternatives described in this EIS are in conformance with BLM (1986), as amended, including BLM (2015). The action alternatives fall within an area designated as moderate use, which is described as follows: "Moderate use areas are generally suitable for a wide range of existing and potential uses and will be managed for production and use of their forage, timber, minerals and energy, recreation, or other values. Where conflicts occur with resources or uses, full consideration of all benefits and costs will be taken into account in resolving such conflicts. Sensitive and significant values will always be protected consistent with Federal and State law. Public lands in a moderate use area will be retained in Federal ownership (BLM 1986:4). No special limitations or restrictions on the type or intensity of resource use will be applied in this area. Valid uses will be allowed subject to environmental review and stipulations or special conditions to protect resources (BLM 1986:6)." In addition, because the siting corridors are in a General HMA for greater sage-grouse, the area is designated as open to wind energy development per BLM (2015).
11327-19	Michael Gibson, Daly Edmunds, Garret Visser; Idaho Wildlife Federation	In Idaho, the majority of Resource Management Plans (RMPs) are outdated and in need of full plan revisions. The Monument Resource Management Plan is no exception- it is severely outdated and includes no reference to wildlife migrations or renewable energy development. The Monument Resource Management Plan was also omitted in the 2005 Wind Energy Development PEIS, which amended 52 BLM land use plans in Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming.56 The absence of plan revisions has left the BLM to largely rely on the 2015 Greater Sage-Grouse Resource Management Plan Amendments to respond to renewable energy projects on public lands. While these amendments require measures that avoid, minimize, and mitigate impacts to Greater sage-grouse and their habitat, they are only looked at through the lens of that one species. This has resulted in negative impacts to other resources and will continue to do so if the BLM does not adopt more comprehensive strategies to guide renewable energy development – regarding siting, operation, and decommissioning. Simply put, southern Idaho will suffer from a piecemeal approach to wind and solar energy development if the BLM continues to analyze projects in the same manner that they are today.	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).
11491-1	Dean Dimond, Jennie Bateman	- My first concern for this draft EIS is that it has not been developed strictly according to the Congressionally mandated criteria of the National Environmental Policy Act, as amended. It includes two Executive Orders (EOs) written to address Environmental Justice (President Clinton 1994) and another regarding Climate Change (President Biden 2021). Although the power of an EO is effective in steering our Nation in effective ways toward addressing issues of great concern, I must point out that the criteria for the NEPA analysis of a	See EIS Section 3.4.1.2.2 (Alternative B [Proposed Action]) Table 3.4-3 (Estimated Annual Project Construction Greenhouse Gas Emissions) for estimates of the direct and indirect GHG emissions as well as EIS Table 3.4-5 (Estimated Annual Project Operation and Maintenance Greenhouse Gas Emissions) in Section 3.4.2.2.2 (Alternative B [Proposed Action]). In addition, EIS Appendix 4 (Mitigation) includes a list of

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		project must include the actual conditions on the ground and the interdisciplinary effects of a project on federal lands. I share the content on the most recent EO and must challenge the far-reaching and barricade to true NEPA analysis that it represents in this draft EIS. Without sounding disrespectful, this EO breeches the authority of the BLM to change the criteria for analysis of environmental impacts of this wind project by removing the existing contributions and of the loss of production of other energy sources within BLM authorities. Without the impact of the loss of other energy production included in this DEIS, the American people cannot assess the need, capacity and or the impact of this wind development project to meeting the domestic energy needs of the American people, the energy grid security and other aspects covered in this EO. To illustrate my comment, an excerpt from EO 14008 signed January 27, 2021 by President Biden follows: "Sec. 207. Renewable Energy on Public Lands and in Offshore Waters. The Secretary of the Interior shall review siting and permitting processes on public lands and in offshore waters to identify to the Task Force steps that can be taken, consistent with applicable law, to increase renewable energy production on those lands and in those waters, with the goal of doubling offshore wind by 2030 while ensuring robust protection for our lands, waters, and biodiversity and creating good jobs. In conducting this review, the Secretary of the Interior shall consult, as appropriate, with the heads of relevant agencies, including the Secretary of Defense, the Secretary of Agriculture, the Secretary of Commerce, through the Administrator of the National Oceanic and Atmospheric Administration, the Secretary of Energy, the Chair of the Council on Environmental Quality, State and Tribal authorities, project developers, and other interested parties. The Secretary of the Interior shall engage with Tribal authorities regarding the development and management of renewable and conventional energy resources on Tribal lands. Sec. 208. Oil and Natural Gas Development on Public Lands and in Offshore Waters. To the extent consistent with applicable law, the Secretary of the Interior shall pause new oil and natural gas leases on public lands or in offshore waters pending completion of a comprehensive review and recon- sideration of Federal oil and gas permitting and leasing practices in light of the Secretary of the Interior's broad stewardship responsibilities over the public lands and in offshore waters, including potential climate and other impacts associated with oil and gas activities on public lands or in offshore waters. The Secretary of the Interior shall complete that review in consultation with the Secretary of Agriculture, the Secretary of Commerce, through the National Oceanic and Atmospheric Administration, and the Secretary of Energy. In conducting this analysis, and to the extent consistent with applicable law, the Secretary of the Interior shall consider whether to adjust royalties associated with coal, oil, and gas resources extracted from public lands and offshore waters, or take other appropriate action, to account for corresponding climate costs. Sec. 209. Fossil Fuel Subsidies. The heads of agencies shall identify for the Director of the Office of Management and Budget and the National Climate Advisor any fossil fuel subsidies provided by their respective agencies, and then take steps to ensure that, to the extent consistent with applicable law, Federal funding is not directly subsidizing fossil fuels. The Director of the Office of Management and Budget shall seek, in coordination with the heads of agencies and the National Climate Advisor, to eliminate fossil fuel subsidies from the budget request for Fiscal Year 2022 and thereafter. Sec. 210. Clean Energy in Financial Management. The heads of agencies shall identify opportunities for Federal funding to spur innovation, commercialization, and deployment of clean energy technologies and infrastructure for the Director of the Office of Management and Budget and the National Climate Advisor, and then take steps to ensure that, to the extent consistent with applicable law, Federal funding is used to spur innovation, commercialization, and deployment of clean energy technologies and infrastructure. The Director of the Office of Management and Budget, in coordination with agency heads and the National Climate Advisor, shall seek to prioritize such investments in the President's budget request for Fiscal Year 2022 and thereafter." I contend that the measurements of climate impacts of existing energy production have not been analyzed to address the true environmental impacts (positive and adverse) of the addition of this wind project. This alone creates a fatal flaw in this DEIS for the Lava Ridge wind project.	the applicant-committed measures to encourage carpooling among construction workers and minimize excessive exhaust emissions from construction equipment. In addition, Section 3.4.2.2.2 quantifies the estimated avoided emissions and the social cost of carbon for Alternative B.
11491-5	Dean Dimond, Jennie Bateman	- My second comment will certainly be unpopular with the Department of Interior and BLM, however, NEPA is required on federal lands and the interdisciplinary analysis of the impacts of any proposed program or project must be determined transparently by the Agency of authority. Glaringly absent is the identification of the BLM interdisciplinary team of resource professionals assigned to this important task. It appears that the Climate Change Task Force created in EO 14008 is directing the use of computer modeling and broad-brush generalities as to impacts of the project. Based on this requirement for BLM to convene their own ID Team, I contend that this draft EIS does not meet BLM's fiduciary requirements for production of federal agency interdisciplinary NEPA documentation. I also question the use of this Task Force as a politically driven group of Presidential appointees that are acting in deference to the Federal Advisory Committee Act (FACA) in a vacuum to meet objectives outside of the federal NEPA statutory requirements. No information generated in this document indicates a full interdisciplinary analysis of even the separate areas of concern identified as to their cumulative impacts to the project area and upon the people living in the immediate area and to the American people. This is a deficiency that only a Supplemental draft EIS can possibly address.	EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers) Table App10-3 provides a list of individuals on the interdisciplinary team from the BLM and the third-party contractor team responsible for preparing this EIS.
11534-2	Matt Arnold, William Eubanks	At its most basic level, FLPMA endeavors to strike a balance between competing uses of federal public lands. Norton v. S. Utah Wilderness All., 542 U.S. 55, 58 (2004). BLM ostensibly achieves that balance through the resource management planning process, which results in the publication of a governing RMP. Id. FLPMA makes clear that a crucial aspect of this process is public involvement. Klamath Siskiyou Wildlands Ctr. v. Boody, 468 F.3d 549, 557 (9th Cir. 2006) (discussing "FLPMA's requirement that BLM ensure the 'views of the general public' and 'third-party participation' are adequately incorporated into the land planning process" (citing 43 U.S.C. § 1701(a)(5); 43 C.F.R. § 1610.2)). Any subsequent authorizations, like authorizing a ROW for a	The BLM SFO's *Monument Resource Management Plan*, as amended, guides decision-making for the public lands affected by the project (BLM 1986). The plan has been amended over the years to address critical resources, including sensitive species such as sage-grouse. Also see responses to comments 1022-3 (see in Table A-3ee, Alternatives) and 11326-9 (see in Table A-3jj, Legal or Policy Compliance). If the project were to be authorized, other uses of public lands would not be precluded.

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		major wind facility, must be consistent with the governing RMP. Norton, 542 U.S. at 69 ("The statutory directive that BLM manage 'in accordance with' land use plans, and the regulatory requirement that authorizations and actions 'conform to' those plans, prevent BLM from taking actions inconsistent with the provisions of a land use plan."). "Unless and until the [RMP] is amended, [inconsistent] actions can be set aside as contrary to law pursuant to 5 U.S.C. § 706(2)." Id. BLM's Shoshone Field Office manages public lands under its jurisdiction according to the 1986 Monument RMP. DEIS at 1-1. That RMP categorized "[a]ll public land in the Monument Planning Area" into four areas, including: "limited use," "moderate use," and "intensive use/development areas." BLM, Monument Resource Management Plan at 4 (Jan. 1986) [hereinafter "Monument RMP"]. According to BLM, the Project will occupy lands "within an area designated as moderate use," DEIS at 1-2, which the Monument RMP describes as: [G]enerally suitable for a wide range of existing and potential uses and will be managed for production and use of their forage, timber, minerals and energy, recreation, or other values. Where conflicts occur with resources or uses, full consideration of all benefits and costs will be taken into account in resolving such conflicts. Sensitive and significant values will always be protected consistent with Federal and State law. Monument RMP at 4; see also id. at 6 (explaining that "[n]o special limitations or restrictions on the type or intensity of resource use will be applied in this area," and "[v]alid uses will be allowed subject to environmental review and stipulations or special conditions to protect resources"). By contrast, "Intensive Use/Development Areas" are those that "will generally be managed for a major or large-scale intensive use/development such as a major campground, off- road vehicle (ORV) area, mine, or public utility installation," but "[n]o intensive use/development areas were established in the Monument RMP." Id. at 4 (emphases added). By acknowledging that "no projects of this size have been constructed before," DEIS at 3-86, the DEIS demonstrates that this Project is precisely the kind of "major or large-scale intensive use/development" that belongs in an "Intensive Use/Development Area," as envisioned by the agency's own land-planning process, see Monument RMP at 4. That no "Intensive Use/Development Areas" were designated in the Monument RMP (or evaluated as part of any concomitant environmental review) clearly indicates that a large-scale wind facility like this one is not "clearly consistent with the terms, conditions, and decisions of the approved [Monument RMP]." 43 C.F.R. § 1601.0-5. Moreover, although the Monument RMP generically envisions in moderate-use areas "a wide range of existing and potential uses," including the vague category of "energy," id., industrial wind-energy facilities were not economically viable, and thus were not even contemplated, sources of energy development on public lands (or elsewhere) at the time the Monument RMP was developed. In fact, as of 1986, only three relatively small wind-energy facilities were in operation. See The U.S. Wind Turbine Database, U.S. GEOLOGICAL SURV., https://bit.ly/418vSWA (last visited April 12, 2023).1 Consequently, the Monument RMP's management prescription for energy development does not even mention potential wind-energy developments; instead, the RMP considers potential "energy leases" alongside "geology" and "minerals" management, indicating that BLM (and the public) only expected and/or considered the kind of fossil fuel developments then in existence on BLM lands. Those traditional energy developments, of course, come with an entirely different set of environmental and related consequences than those resulting from hundreds of 700-foot turbines across thousands of acres of the surface estate administered by BLM. In short, authorizing this Project would plainly change the "scope of resource uses" under the Monument RMP. 43 C.F.R. § 1610.5-5 ("An amendment shall be initiated by . . . a change in the scope of resource uses" of the RMP). And, it would be arbitrary and capricious for BLM to interpret the scope of the Monument RMP's language regarding a "wide range of existing and potential uses" as encompassing energy sources that were not viable or contemplated at the time of its promulgation. See, e.g., Boody, 468 F.3d at 557 ("[D]esigning a management plan that 'contemplates' a wide swath of future changes" to avoid "plan amendments" is unlawful because it "would render nugatory the provisions of FLPMA requiring BLM to act in accordance with established resource management plans.").	
11534-3	Matt Arnold, William Eubanks	The patent inconsistency between the Monument RMP and the Project is further underscored by the fact that in 2005 BLM undertook a programmatic review with the express purpose of amending 52 specific "BLM land use plans to address wind energy development"— but BLM explicitly excluded the Monument RMP from that programmatic review. See BLM, Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM- Administered Lands in the Western United States at 1-2, 2-26–2-27 (June 2005) [hereinafter "Wind Energy PEIS"]; see also BLM, Record of Decision: Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments (Dec. 2005) [hereinafter "ROD"]. For those RMPs that the agency excluded from its programmatic decision (such as the Monument RMP), BLM explained that it "expected" wind energy projects to be addressed "through ongoing and future land use planning efforts." See ROD at 6 ("The amendment of 52 BLM land use plans to adopt the program ensures that the program will have a maximum effect. Additional land use plan amendments and revisions are expected to follow the issuance of this ROD in those remaining areas with potentially developable wind energy resources through ongoing and future land use planning efforts."). In the DEIS for this Project, BLM attempts to sidestep the ROD's commitment to future RMP amendments by implying that the reason for the Monument RMP's exclusion from the agency's previous programmatic review is a mystery. See DEIS at 1-7 (The "[ROD] states that this exclusion could have been for a variety reasons, including that developable wind resources were not deemed present in the area managed by the [Shoshone Field Office] at that time, or that [the Monument RMP] was expected to be amended in the near term (and thus analysis would be incorporated into [that RMP])."). But the reason the Monument RMP was excluded is no secret; the 37-year-old Monument RMP is long overdue for revision, and has been scheduled to be replaced imminently. BLM itself acknowledged as much in 2014 when reevaluating the RMP for the abutting Jarbidge Field Office. See, e.g., BLM, Jarbidge	See response to comment 11534-2 (Table A-3jj, Legal or Policy Compliance).

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		Proposed RMP/final EIS at 4-102 (May 2014) (noting that the Shoshone Field Office and others nearby "are scheduled to prepare RMPs for their respective planning areas in the near future." (emphasis added)). In other words, it is clear that the Monument RMP was excluded from the 2005 ROD either because BLM anticipated that it would be formally amended before any industrial wind energy facilities were authorized, or because BLM, in 2005, did not deem the public lands governed by the Monument RMP to contain developable wind resources. Either rationale only further reinforces that BLM's 1986 Monument RMP (developed nearly two decades before the agency's 2005 programmatic wind-energy review that itself excluded these public lands) in no way contemplated, or even could have contemplated, the possibility of massive commercial- scale industrial wind-energy turbines and infrastructure on these public lands. Put simply, BLM cannot have it both ways—having already acknowledged in the PEIS that BLM had to amend 52 RMPs prior to BLM authorizing specific wind-energy projects under those RMPs, BLM must likewise amend the Monument RMP prior to authorizing wind-energy projects under this RMP. Balancing wind-energy production as a new addition to the "multiple uses" permitted by the Shoshone Field Office now is also imperative because "wind energy generation in [the Twin Falls District Office] is expected to increase substantially over the next 30 years. At least two other large wind energy facilities are proposed near the Lava Ridge Wind Project." DEIS at 3-85. But, as explained, BLM has not considered in the DEIS or elsewhere how this new, major energy source—which is fundamentally different from other energy sources in terms of its impacts on public lands and the many users of those lands—fits within the Monument RMP's existing energy-production mix, nor how that overall mix balances with non-energy uses on BLM lands in the Shoshone Field Office. Until and unless BLM completes a formal amendment to the Monument RMP that adequately addresses these concerns, BLM must halt the DEIS process to avoid unlawfully placing the cart (Project-specific DEIS) before the horse (RMP amendment). Only once an RMP amendment process is complete may BLM restart its DEIS process, and any new Project-specific EIS process must rely upon and be "clearly consistent with the terms, conditions, and decisions of the approved [amendment to the Monument RMP]." 43 C.F.R. § 1601.0-5. In the absence of an amended RMP prior to approval of this Project, BLM will stand in flagrant violation of FLPMA, NEPA, and those statutes' implementing regulations.	
11534-4	Matt Arnold, William Eubanks	BLM Must Specify Which Version of NEPA's Implementing Regulations the Agency is Relying on to Analyze the Project As a threshold matter, the DEIS does not disclose which version of NEPA's implementing regulations BLM is applying to analyze the Project. In 1978, CEQ promulgated regulations implementing NEPA, 43 Fed. Reg. 55978 (Nov. 29, 1978), as well as a minor substantive amendment to those regulations in 1986, see 51 Fed. Reg. 15618 (Apr. 25, 1986). In 2020, however, CEQ published a new rule, effective September 14, 2020, further revising the 1978 regulations. 85 Fed. Reg. 43,304-43,376 (July 16, 2020). Shortly after the new rule was published, CEQ announced that it had "begun a review of the 2020 Rule to, among other things, determine if the rule may adversely affect environmental justice communities, climate change or environmental quality." Sec'y of Interior, Secretarial Order No. 3399, Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process § 3 (Apr. 16, 2021) [hereinafter "NEPA Order"]. In recognition of that review, Secretary of the Interior Deb Haaland directed agencies within the Department of Interior—including BLM—to "not apply the 2020 Rule in a manner that would change the application or level of NEPA that would have been applied to a proposed action before the 2020 Rule went into effect on September 14, 2020." Id. § 5(a). The DEIS dos not identify which version of NEPA's implementing regulations BLM applied to analyze the Project and its effects on the environment. Given the present uncertainty surrounding NEPA's implementing regulations, clarification is necessary; that is, BLM should specify whether it is relying on the 2020 NEPA regulations, or those that were in effect when BLM issued the 2005 Wind Energy PEIS. If the former, BLM must also explain why it has decided to ignore the Secretary's NEPA Order, what authority it retains to do so, and how it has rectified any incongruities between the analytical bases for the DEIS and the document to which it tiers. Such explanation is important for assuring the public that BLM has not used the current ambiguity surrounding NEPA's regulations to sidestep any environmental analyses for this commercial-scale Project with its significant impacts.	The BLM uses the direction and guidance provided in the most recent laws, regulations, and policies.
11534-6	Matt Arnold, William Eubanks	The DEIS purports to "tier" several important effects analyses to the 2005 Wind Energy PEIS. DEIS at 1-7; see also id. at 1-5 (explaining that "issues analyzed in other NEPA documents and tiered to in the [DEIS] . . . were analyzed in brief" in Appendix 3). The abbreviated discussion of impacts based on tiering includes, for example, how Project lighting affects bat foraging; how dust from Project roads affect vegetation, wildlife, and invertebrates; and the collision and electrocution risks posed to raptors by overhead powerlines, among others.3 BLM's decision to rely on the PEIS to escape its "hard look" duty under NEPA is arbitrary for multiple reasons. First, the 2005 Wind Energy PEIS is already stale and cannot, therefore, be used to support the Project authorization sought here. See Western Org. of Res. Councils v. Zinke, 892 F.3d 1234, 1244-45 (D.C. Cir. 2018) (BLM "admits that any deficiencies in the PEIS," including that it is "too outdated," "may affect the ability of BLM to 'tier' to that document when making individual leasing decisions."). The PEIS here was prepared in 2005, when wind projects existed in only three areas on BLM-administered lands. Even then, the collective generating capacity of those projects is likely smaller that this single Project alone. Compare PEIS at 2-28–2-29 (identifying projects with a combined generating capacity of 1,558 MW), with DEIS at 2-4 (considering installation of "349 6-MW turbines," or 2,094 MW total). Since the PEIS was published, wind energy projects (and the best way to mitigate the impacts thereof) have evolved significantly, including important technological advances that allow them to be installed in an increasing number of environments. This is evident from the fact that the Shoshone Field Office's Monument RMP was excluded from those amended by the PEIS because "developable wind resources were not deemed present in the area managed	The December 2005 *Record of Decision for the Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments* states, "The decision is hereby made to implement a comprehensive Wind Energy Development Program to administer the development of wind energy resources on BLM-administered public lands in 11 western states: Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming. The decision establishes policies and best management practices (BMPs) for the administration of wind energy development activities and establishes minimum requirements for mitigation measures. The policies and BMPs were evaluated in the Final Wind Energy PEIS (BLM 2005a) and are included in Attachment A. With the decision to implement the Wind Energy Development Program, the BLM Interim Wind Energy Policy (BLM 2002) will be replaced by a new policy that incorporates the programmatic policies and BMPs evaluated in the PEIS. Elements of the Interim Policy addressing applications, authorizations, competitive interests, and due diligence will not be changed by the new program requirements" (emphasis added) (BLM 2005b). In processing the application for the Lava Ridge Wind Project, the BLM follows the elements and the BMPs established by the December 2005 ROD (BLM 2005b) and analyzed in the PEIS. The BLM recognizes that the use of these program elements and BMPs are not a requirement established by an amended land use plan but considers them as established guidance through policy.

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		by the SFO [i.e., Shoshone Field Office] at that time." DEIS at 1-7. The PEIS itself implicitly acknowledges that such advancements limited its utility in future authorizations. The "Maximum Potential Development Scenario" ("MPDS"), for instance, is limited to 20 years (i.e., until 2025). PEIS at 2-2–2-3 (explaining that the MPDS "identifies the spatial distribution of the maximum possible extent of future wind energy development activities that may occur on BLM- administered lands over the next 20 years (i.e., 2005 through 2025)," and was "evaluated . . . as representing an upper bound of potential impacts and showing where the potential development may occur."). The Project here is slated to operate until 2055 at least, and in an area outside those considered by the MPDS. DEIS at 2-3 ("The EIS analysis assumes an approximate project schedule consisting of three phases: 2 years of construction, up to 30 years of operation and maintenance, and 2 years of decommissioning."). On its face, therefore, the PEIS is an inappropriate basis for tiering in the DEIS, both because the analysis contained in the PEIS is severely outdated and, in any event, was never intended to apply to wind-energy projects on these public lands or operating three decades into the future after the conclusion of the PEIS's own stated window of analysis. Even setting aside the age and geographical limitations of the PEIS, it is also an improper basis for tiering due to its cursory (or, in some cases, non-existent) analysis of certain issues. ... BLM's decision to tier to the PEIS also undermines other sections of the DEIS, rendering those "analyses" insufficient under NEPA and Ninth Circuit precedent. See DEIS at App'x 3-2, (deferring to the PEIS for examinations of Project effects in a broad array of areas, including "avian habitat," "noise and human activity from project construction and operation," "collision and electrocution risks" to raptors from overhead powerlines, and groundwater contamination, among other things). Because these tiered analyses fail to provide "some quantified or detailed information" concerning the actual effect this Project will have on the resource, "neither the courts nor the public . . . can be assured that [BLM] provided the hard look that it is required to provide" under NEPA. Neighbors of Cuddy Mtn. v. U.S. Forest Serv., 137 F.3d 1372, 1379-80 (9th Cir. 1998).	See EIS Section 3.1.2.2. The BLM has evaluated the information provided in the PEIS for its applicability to the project and uses the analysis as support for the use of BMPs. The draft and final EIS provide an in depth review of specific impacts that could occur if the Proposed Action or alternatives are selected. The information provided in the PEIS and the EIS together provide the information needed to support a "hard look" as the BLM considers the decision on the proposal.
11535-2	Steven Andersen	We also reiterate our strong objection that the BLM is processing this application before the completion of the NEPA process for the Programmatic Environmental Impact Statement ("PEIS") and correlating Resource Management Plan amendments for western states, which is being expanded to BLM-administered lands in Oregon, Washington, Montana, Wyoming and Idaho. According to the Notice of Intent and Planning Criteria, the PEIS is specifically being completed to appropriately account for protection and management of cultural and historic resources in response to the development of utility-scale renewable energy development projects like Lava Ridge. The DEIS states that the current PEIS for Wind Energy Development in the Western United States (BLM 2005) did not amend the Monument RMP but is relevant for the Lava Ridge Wind EIS and goes so far as to indicate that the EIS tiers to the BLM's 2005 Final Programmatic Environmental Impact Statement for Wind Energy Development on BLM Administered Lands in the Western United States, even though the 2005 Programmatic EIS only applied to BLM administered lands in Arizona, California, Colorado, Nevada, New Mexico and Utah – not Idaho. Tiering this EIS to the inapplicable 2005 Programmatic EIS is inappropriate; however, the PEIS and correlating RMP amendments for western states will extend to Idaho: To accelerate the processing of the Lava Ridge application ahead of the PEIS and necessary RMP amendments is contrary to the mandate of Executive Order 14008 and the BLM's obligations under FLPMA.	The ongoing planning effort supported by the programmatic EIS is focused on renewable solar energy projects not wind projects. The BLM SFO is working with the BLM State and Headquarter offices so that the planning action and actions (if any) authorized at on a project level are not conflicting. See response to comment 11534-6 (see in Table A-3jj, Legal or Policy Compliance).
11535-3	Steven Andersen	Additionally, processing of this application should await a decision on Proposed Federal Rule Doc. 2023-06310 in response to Executive Order 14072. The proposed rule is intended to "promote the use of conservation to ensure ecosystem resilience, and in so doing the proposed rule would clarify conservation as a use within the BLM's multiple use framework, including in the decision making, authorization and planning processes."2 Given the complexity of the proposed project and its multi-faceted impacts on public lands, and the clear disturbance of the ecosystem, awaiting the finalization of the rule would provide clarity to defining key terms like disturbance, direct and indirect effects, important, scarce and sensitive resource, as well as "Indigenous Knowledge" and "intact landscape" as well as "mitigation" and "permittee" when identifying the responsibility of parties in the context of mitigation. Id. All of this is directly related to the Lava Ridge proposal and will be impactful to analysis of the application and evaluation of associated environmental impacts.	The BLM's is processing this application consistent with all applicable laws, regulations, and policies. The BLM has coordinated with Native American Tribes throughout the evaluation of the project, considering their input and feedback on processes and potential impacts. The information obtained through coordination with Native American Tribes and other stakeholders and communities play a significant role in shaping the information in the EIS and the BLM's decision.
11535-5	Steven Andersen	This action is closely related to and should be discussed in the same NEPA document as proposed actions for the entire Southwest Intertie Project northern portion, known as SWIP North (SWIP Phase III).3 These actions are part of a singular, connected system and are so functionally interdependent as to constitute a single federal action. Both actions are aspects of a broader proposal and a single NEPA document is necessary to fully and adequately evaluate the cumulative impacts contemplated by the system. LS Power strategically sited Lava Ridge to feed into SWIP, as shown in LS Power's own materials: In fact, MVE's Development Plan and the alternatives discussed in the DEIS repeatedly address suitable access for interconnection with SWIP-North. There is no independent utility in Lava Ridge without SWIP North, and analysis of the environmental impacts of the two projects should not be segmented to avoid a broader and more accurate analysis of those impacts. In fact, although the financial capability of MVE was glossed over in MVE's Plan of Development, MVE's financing for Lava Ridge is dependent upon completion of and interconnection to SWIP North and securing Power Purchase Agreements (as well as Federal financing). Currently, SWIP North is undergoing cultural inventories, sage grouse analysis and ethnographic studies. However, failure to consider the projects together fails to account for key impacts like habitat fragmentation and consideration of broader alternatives to meet national "clean" energy objectives. By considering the actions piecemeal, the agency and public cannot understand the true scope and impact of the activities that should be under consideration. MVE's attempt to	Within the draft EIS Section 3.1 (Introduction and Methodology), the SWIP-North transmission line is described as an authorized use contributing to cumulative impacts. The combined impacts of the existing and future trends and actions and the project are discussed for each resource in the analysis of potential impacts.

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		divide up this project for separate consideration under NEPA is inappropriate and the agency's consideration of the projects separately is arbitrary and capricious.	
11535-15	Steven Andersen	The project fragments large, continuous tracts of sage-grouse habitat, and does not focus the wind energy development on lands already altered or cultivated and away from areas of intact and healthy native habitats. 35 This is contrary to policy. Wind energy development located in areas with high levels of conflict and sensitive resources present the public and land management agencies with a corresponding risk or adverse consequences. Development should be directed away from areas of high conflict resources and towards areas of low conflict, such as previously disturbed sites, areas adjacent to previously disturbed sites, and locations that minimize construction of new roads and transmission lines.36 Broad EPA and BLM policies express a preference for directing renewable energy development towards low conflict areas. These policies aim to promote renewable energy development on disturbed or degraded lands, and also establish screening and prioritization processes designed to direct development away from lands with high conflict or sensitive resource values and towards low conflict areas.37 None of this was properly considered in the DEIS. The Audubon Society has designated lands within the boundary of the INL, generally throughout the proposed project area, as a global "Important Bird Area," with a concentration of species that inhabit largely undisturbed sagebrush steppe habitats, i.e., sage-grouse.	The steps MVE took as they considered project locations are described in the Alternatives Considered by MVE (Appendix C in MVE [2023]). The descriptions of these steps support that the BLM and other agencies worked with MVE to direct projects away from high conflict resources, such as priority habitat management areas for sage-grouse. Sections 3.7 (Fire and Fuels Management) and 3.15 (Vegetation) describe the project area as having high levels of disturbance from wildfire and having significant areas of non-native plant communities. Additionally, within Section 3.8 (Land Use and Realty), the draft EIS describes the development of high voltage transmission lines that are authorized and in place within the project area. Other areas of public lands outside of the project area have much less development, have seen less impacts from wildfires, and continue to have intact native plant communities offering higher quality wildlife habitat. The BLM recognizes that there continues to be important resources within the project area and fully considers potential impacts within the draft and final EIS with the intent of making an informed decision considering all laws, regulations, and policies.
11535-170	Steven Andersen	The DEIS selects the site alternatives without adequate consideration of suitability. It appears the sites presented in the DEIS were considered as suitable in large part due to insufficient and outdated land management plans. By avoiding "red tape" found in updated and comprehensive land management plans and areas with VRM Class ratings, the site is not more suitable. Rather, the agency has a duty to assess the same factors that should be considered in such updated plans, including visual resource management concerns. It has been widely reported that there is relatively low wind energy potential in the proposed project area. This is why the area was not included in the BLM's Final Programmatic EIS for Wind Energy Development on BLM-Administered Lands in the Western United States (BLM 2005a). See Record of Decision, December 15, 2005 (and associated wind study). In reality, MVE wanted proximity to SWIP North, with very little red tape.	See responses to comments 11326-9 (see in Table A-3jj, Legal or Policy Compliance), 11534-2 (see in Table A-3jj, Legal or Policy Compliance), 11535-15 (see in Table A-3jj, Legal or Policy Compliance), and 11535-149 (see in Table A-3y, Visual Resources).
11535-172	Steven Andersen	Further, breaking up this NEPA analysis from the SWIP North analysis eliminates an evaluation and understanding of MVE's interconnection requirements and a cohesive analysis of the location suitability.	See response to comment 11535-5 (see in Table A-3jj, Legal or Policy Compliance).
11546-2	Dan Sakura	Doe Run Solicitor's Opinion. The DEIS does not adequately describe the Secretary's responsibilities to manage units of the National Park System pursuant to NPS statutory authorities, in conjunction with FLPMA and other authorities outlined in the Friends of Minidoka comment letter. The relationship between the Secretary's requirement to manage parks unimpaired for future generations pursuant to the Organic and Redwoods Acts and actvities on lands outside the boundaries of National Parks is described in the 1998 Solicitor's Opinion relating to permits requested by the Doe Run mining company. Redwoods Act. The Redwoods Act of 1978 states that "Congress further reaffirms, declares, and directs that the promo□on and regulation of the various areas of the National Park System, as defined in section 2 of this Act, shall be consistent with and founded in the purpose established by the first sec□on of the Act of August 25, 1916, to the common benefit of all the people of the United States." According to Molly Ross, the Doe Run opinion concludes that the Secretary "bears responsibility both for determining whether the ac□vi□es of other DOI bureaus threaten park resources and values and—as implied in the solicitor's description of the secretary's options—for protecting them, as long as the statutes governing those non-NPS activities provide the secretary sufficient discretion." Because the Organic Act (as amended by the Redwoods Act) does not expressly limit "authorization of activities" to areas within park boundaries, the Solicitor found that "the text of the 1978 [Redwoods Act] Amendment and the other legal considerations discussed in this sec□on support the conclusion that the Organic Act as amended in 1978 does have application to the Secretary's exercise of his authorities over ac□vi□es taking place outside the boundaries of park units."3 The Congressional guidance in Minidoka's authorizing legislation directs the Secretary to preserve and interpret the Minidoka Relocation Center, which extends well beyond the boundaries of the Minidoka National Historic Site's authorized boundary.	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. See also response to comment 9080-46 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11546-6	Dan Sakura	Secretary's authority outside park boundaries. As a general mater, the Solicitor's opinion cites an article no□ng the Secretary's "general lack of regulatory authority over ac□vi□es arising outside the parks." Robert B. Keiter, On Protec□ng the National Parks from the External Threats Dilemma, 20 Land & Water L. Rev. 355 (1985).4 However, in the case of Lava Ridge, the Secretary has the authority under FLPMA to deny Magic Valley Energy's application for a BLM ROW permit. Derogation of park purposes is not directly and specifically authorized. According to the Solicitor, the Redwoods Act requires that "`authorization of activities' shall not be exercised 'in derogation of the values and purposes for which these various areas have been established,' except as 'directly and specifically provided by Congress.'"	See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19 (Minidoka National Historic Site Interpretive Purpose) in the final EIS. See also response to comment 9080-46 (see in Table A-3cc. Mitigation – EIS Appendix 4).
11546-7	Dan Sakura	As noted in the Friends of Minidoka letter, FLPMA by itself directs the Secretary to preserve Minidoka's cultural resources by beginning a planning process to consider the Greater Minidoka ACEC. In conjunction with park specific authorizing legislation, there is clear Congressional authority to protect Minidoka. Moreover, FLPMA does not "directly and specifically" authorize the Secretary to derogate Minidoka's values and purposes. Also, the Energy Policy Act does not include direct or specific authority relating to Minidoka NHS: it directs the Secretary to seek to permit at least 25 gigawatts (GW) of electricity from wind, solar, and geothermal projects by 2025, a nationwide goal. Redwoods Act and Minidoka NHS. The Solicitor found that "[t]he more the threat is	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service) and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		direct, specific, and credible, and the more it relates to a fundamental value or purpose of the park in ques□on, the more clearly the 1978 Amendment comes into play."6 As noted by the Friends of Minidoka DEIS comment letter, the proposed Lava Ridge project poses a direct, specific and credible threat to Minidoka's viewshed and associated park purposes and fundamental values to interpret the lives of incarcerees and support commemora□ve ac□vi□es and healing. The FEIS should consider the Solicitor's Opinion in its analysis of BLM's legal authorities.	
11554-12	Raul Labrador; Idaho Attorney General's Office	MVE is an out-of-state energy company that wants to take public lands and use them for private gain. The Project's unprecedented scope has raised significant concerns across the public-interest spectrum. And for good reason. Bulldozing across nearly 200,000 acres of public land to import 400 steel turbines that rise up 740 feet and crank 230-foot blades all day is going to cause unalterable damage and have serious collateral consequences. If the Project is approved, Idaho's people, resources, and interests will bear these harms so MVE can sell power to California. These concerns are reflected by the Idaho Legislature's joint resolution—unanimously passed—opposing the Project. See Idaho House Concurrent Resolution 4, (2023). Indeed, the agency must steward these lands for the benefit of the public and ensure that any use is consistent with the land's public nature. See 43 U.S.C. § 1701(8). The agency must also ensure that uses do not violate protected interests, such as State, environmental, and tribal interests. But MVE's proposal and the agency's preferred alternatives are legally indefensible. The agency's Draft Environmental Impact Statement acknowledges as much, repeatedly noting the "irreversible and irretrievable" consequences posed by the Project. It is well recognized in our federal system that Idaho retains sovereign interests in its water, air, wildlife and the well-being of its people. See Massachusetts v. E.P.A., 549 U.S. 497, 518–19 (2007). MVE's Project would infringe on each of these interests. And the BLM's draft EIS fails to account for these harms in its proposed alternatives. [...] CONCLUSION [...] It's no surprise that the agency's failure here has catalyzed Idahoans from across the political spectrum to unite in opposition to the Project.12 The agency should listen to these voices and reject MVE's attempt to capitalize personally at the expense of the public. The harms are overwhelming and are too great to ignore.	The BLM recognizes the State of Idaho's interest and the potential of uses on public lands to result in impacts to air, water, and wildlife. Early in the evaluation of the project, the BLM coordinated with the State of Idaho agencies and incorporated them as cooperating agencies in the preparation of the EIS. The BLM has coordinated with State agencies extensively and used information pertaining to the State's jurisdiction by law and the agencies' expertise to prepare the EIS and provide a hard look at these issues. The potential impacts to water, air, and wildlife have been described in the EIS.
11554-13	Raul Labrador; Idaho Attorney General's Office	MVE's Project cannot be justified under the law. It represents a disregard for the environment and other vital interests entrusted to the agency's safekeeping. The Project cannot be squared with Congress's mandate in the FLPMA that the agency must manage all public lands to "protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values." 43 U.S.C. § 1701(8). The agency's draft EIS fails to take a hard look at the numerous sweeping environmental impacts the Project will cause. Ctr. for Biological Diversity v. Dep't of Interior, 623 F.3d at 641 (9th Cir. 2010). It also fails to account for numerous other relevant interests. And the Project would significantly intrude on Idaho's "residual and inviolable" sovereignty, disrupting the critical federal-state balance that underlies our constitutional system of "dual sovereignty." Printz, 528 U.S. at 918–19. On the other side of the balance sheet, only one private company will profit.	BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. Within the EIS the BLM fully considers impacts to resources and considers the potential impacts and how they relate to laws, regulations, and policies. The BLM recognizes the State of Idaho's interest and the potential of uses on public lands to result in impacts. Early in the evaluation of the project, the BLM coordinated with the State of Idaho agencies and incorporated them as cooperating agencies in the preparation of the EIS. The BLM has coordinated with State agencies extensively and used information pertaining to the State's jurisdiction by law and the agencies' expertise to prepare the EIS providing a hard look at a comprehensive set of issues.
11554-14	Raul Labrador; Idaho Attorney General's Office	Idaho has a special interest in preserving the wildlife within its borders. See Kleppe v. New Mexico, 426 U.S. 529, 545 (1976) ("Unquestionably the States have broad trustee and police powers over wild animals within their jurisdictions."); Baldwin v. Fish and Game Comm'n of Montana, 436 U.S. 371, 391 (1978) ("Protection of the wild life of the State is peculiarly within the police power, and the State has great latitude in determining what means are appropriate for its protection.") (cleaned up). Indeed, "the protection of wildlife and other natural resources of a state are some of the state's most important interests." Conservation Force, Inc. v. Manning, 301 F.3d 985, 996 (9th Cir. 2002) (cleaned up). To protect this critical interest, Idaho law declares "[a]ll wildlife ... within the state of Idaho . . . to be the property of the state of Idaho" and requires the state to "preserve, protect, perpetuate, its wildlife" and "provide continued supplies of such wildlife for hunting, fishing and trapping." Idaho Code § 36-103(a). The Project will undermine Idaho's rights over its wildlife. And no amount of compensatory mitigation will adequately address the Project's deep harms.	The BLM recognizes the State authorities and responsibilities for managing wildlife. The BLM regularly coordinates on broader policies and principles for ensuring the sustainability of wildlife and their habitats located on public lands. Additionally, the BLM has coordinated with the State of Idaho through our evaluation of the project to ensure that important issues and potential impacts are considered. With the information and expertise that the State of Idaho has provided, the BLM has prepared an EIS that will provide what is needed to take a hard look that considers potential impacts to wildlife and the State of Idaho's interests in the project.
11563-6	Idaho Cattle Association	The Biden administration and Department of Interior leadership have made clear their priority to encourage and facilitate renewable energy development on federal lands. The Lava Ridge project is certainly an outgrowth of that. Despite the administration's goals for expanded renewable energy, adequate review and planning for such massive infrastructure has not occurred. The BLM's Resource Management Plan (RMP) for this area dates back to 1986 and lacks sufficient direction for managing energy development. At the local and state level, there should be an effort undertaken to first develop comprehensive energy development planning and then update plans RMPs accordingly, with the input of the locally affected communities at every step of the way. This project should be put on hold until the RMP is updated and the BLM, in concert with the state, has more robust plans for energy development across the state.	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).
11598-3	Idaho Conservation League	If the BLM still decides to move forward with some form of an action alternative for this project, we recommend that the BLM not proceed directly towards a Final Environmental Impact Statement and Record of Decision but instead initiate a Supplemental Draft Environmental Impact Statement. We note that Federal Agencies can take this step when it becomes clear that additional information or additional alternatives are needed. The BLM can use the SDEIS process to conduct additional baseline monitoring on wildlife and cultural resources, further the analysis in response to public comments about the project, and develop one or more additional alternatives that better avoids, minimizes and mitigates impacts. We believe that it is possible to address the wildlife issues detailed below through a robust Supplemental draft EIS process, a programmatic approach on BLM lands	The BLM has prepared a full and detailed analysis with robust public participation with the NEPA process supporting requirements for a hard look in BLM decision-making. After the public comment period for the draft EIS, the BLM responded to comments by • modifying alternatives as supported by analysis or comments; • improving or modifying analysis after considering information from comments; • making factual corrections; and • adding detail or adjustments to mitigation measures supported by analysis or comments.

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		across southern Idaho, and a willingness of the project proponent to adjust the proposal to better fit the landscape.	The BLM's NEPA policy that a supplemental analysis is not warranted unless the BLM • makes substantial changes to the Proposed Action that are relevant to environmental concerns; • adds a new alternative that is outside the spectrum of alternatives already analyzed; or • there are significant new circumstances or information relevant to environmental concerns and bearing on the Proposed Action or its effects. In our review of comments and preparing the final EIS, the BLM did not make any of these adjustments warranting supplementation.
11598-24	Idaho Conservation League	Comments on NEPA Procedure ICL appreciates how future micro-siting might be used to further avoid and minimize impacts, but we are concerned about the BLM not taking the required hard look as required by NEPA: Although the exact location of infrastructure and activities within the siting corridors is unknown at this time, evaluating the entirety of the siting corridors for potential impacts provides flexibility to site the project components where necessary (from both resources and engineering perspectives) within the siting corridors. The project's final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. Lava Ridge DEIS, ES-vi. and Although the exact location of infrastructure and activities within the siting corridors is unknown at this time, evaluating the entirety of the siting corridors for potential impacts provides flexibility to site the project components where necessary (from both resources and engineering perspectives) within the siting corridors. The project's final design and engineering would be completed after the BLM has issued a record of decision (ROD) and would be informed by applicant-committed measures and other mitigation requirements established in the ROD. The project's final design would identify the specific location for all infrastructure and project activities and would be approved by the BLM Authorized Officer. This EIS identifies and considers effects to resources present within the siting corridors, allowing for identification of areas with fewer impacts or specific resource trade-offs. This identification of resource constraints within the siting corridors provides flexibility for the project design to adjust through site-specific engineering for the final layout. EIS 2-2. In order to address these and other NEPA deficiencies, we recommend that the BLM complete a Supplemental Draft Environmental Impact Statement (SDEIS). The BLM can use that opportunity to conduct additional baseline monitoring on wildlife and cultural resources, further the analysis in response to public comments about the project, and develop one or more additional alternatives that actually avoid impacts (see Figure 1 below). We note that the BLM has utilized a SDEIS for the Jonah Infill Drilling Project, Willow Master Development Plan, Arctic National Wildlife Refuge Coastal Plain Oil and Gas Leasing Program. The Forest Service has utilized the Supplemental process for the Stibnite Gold DEIS and the CuMo Mine Exploration Project EA, both also in Idaho. The SDEIS should also include alternatives for the permanent administrative protections of those areas deemed incompatible with infrastructure development, including Areas of Critical Environmental Concern, as mentioned below.	The BLM's NEPA policy recognizes the level of detail used to describe a proposed action will vary by nature and stage of the project and the level of detail will influence the specificity of the analysis and assumptions made in analyzing the potential impacts. Utilizing siting corridors in the Proposed Action and alternatives to describe the location of proposed infrastructure provides the required amount of detail to fully analyze the potential impacts. The details provided in the description of the siting corridors, the proposed infrastructure, and the actions associated with construction and operation has provided the information needed to have • focused and meaningful public input and internal discussions, • completely identify issues, • develop a range of reasonable alternatives, • prepare a sound and focused analysis of effects, • have a focused consideration of mitigation measures, and • supports a hard look for BLM decision-making. See response to comment 11598-3 (see in Table A-3jj, Legal or Policy Compliance).
11598-26	Idaho Conservation League	As noted in our scoping comments, the Monument RMP calls for more detailed management plans or activity plans when the need arises. As part of mitigation for this project, the BLM should complete an activity plan focused on protecting the values of the adjacent Minidoka National Historic Site: Detailed Management Plans The RMP provides general guidance for the resource area. More detailed management plans, called activity plans, will be prepared to deal with areas where a greater level of detail is required. Activity plans will indicate specific management practices, improvements, allocations, and other information for a particular site or area. They will be prepared for most major BLM programs such as range (allotment management plans), recreation (recreation area management plans), wildlife (habitat management plans), and cultural resources (cultural resources activity plans.). Where two or more activities have activity plan needs in the same general area, a single consolidated activity plan may be prepared. Coordination, consultation, and public involvement are integral parts in the formulation of activity plans. -Monument RMP, p. 26.	The action alternatives are not proposed on Minidoka NHS; the NPS manages Minidoka NHS under the *Minidoka Internment National Monument: General Management Plan* (NPS 2006). The BLM is adding an EIS section evaluating potential project impacts to the NPS interpretive purpose at Minidoka NHS. Also see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
11598-31	Idaho Conservation League	Decision Space The BLM should be clearer about the decision space it has for this project and if the No Action Alternative is feasible. In the event the BLM selects the No Action Alternative for the Lava Ridge Project, the BLM should also inform the public if there is anything in the Resource Management Plan (RMP) or BLM policy that would prevent another renewable energy project from being proposed in the same location.	The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based the information specific to the project.
11598-34	Idaho Conservation League	A programmatic approach needed to select appropriate areas for renewable energy development. Many members of the public are concerned that Lava Ridge is just the first of a series of projects that would fully develop the Snake River Plain with renewable energy projects. State and federal agencies need to be clear that to meet Idaho's clean energy goals and the Administration's renewable energy goals, it will not be necessary to develop all potential lands in southern Idaho with solar, wind or geothermal energy projects. While we do not believe this full development would occur in the foreseeable future, we are concerned that less suitable sites with conflicting public values may be developed. At this point, there is nothing in the BLM or State direction that would specifically preclude such overdevelopment or protect existing uses. While Lava Ridge would appear to be a suitable location based on avoidance of important areas such as Sage-grouse Priority and Important Habitat Management Areas, Wilderness Study Areas, Areas of Critical Environmental Concern and known habitat for threatened and endangered species, there are still significant issues with the proposed location based on other values. It may be the case that some form of energy project in the Lava Ridge location is indeed the best place in the Snake River Plain for a development project, but without an additional programmatic analysis, we will not know for sure. A transparent, public process is the best way to build confidence in renewable energy projects and to prevent renewable energy projects from being developed	The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands. Additionally, the BLM has determined that the proposed action and range of reasonable alternatives needed to meet the purpose and need are in conformance with the *Monument Resource Management Plan* (BLM 1986), as amended. Therefore the preparation of a programmatic analysis for the purpose of supporting a land use plan amendment for renewable energy is outside the scope of the EIS. See response to comment 11534-6 (see in Table A-3jj, Legal or Policy Compliance).

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		in sensitive areas such as wildlife and viewsheds where renewable energy projects should not be allowed. We recommend that the BLM take a programmatic approach across all Resource Management Plans in southern Idaho and see which areas have the greatest renewable energy potential with the fewest natural resource and community impacts. Once the BLM has gone through this process and identified a discrete number of sites and acreages suitable for energy development, the BLM should apply its Prioritization Criteria for these sites and facilitate the permitting of projects that are "smart from the start." We propose that the Idaho BLM undertake a series of Resource Management Plan amendments, similar to the Greater sage-grouse RMPA (Resource Management Plan Amendments) process. The Monument RMP is one of the oldest RMPs in the country and many of the other RMPs are also significantly outdated and insufficient to provide adequate guidance on renewable energy development. Without a consistent approach to this issue, we are concerned that public lands are going to be developed in an uncoordinated and patchwork manner with projects receiving different levels of scrutiny, varying levels of protections, inconsistent design features, insufficient mitigation measures and suboptimal coordination for efficient energy development. Just as the Greater sage-grouse RMPA focused on management issues that may affect Greater sage-grouse, this Renewable Energy RMPA would update RMPs to examine resource energy potential and energy transmission and the effects that these projects might have on cultural resources, wildlife habitat, recreation and other community values. For areas that are identified through this RMPA process as being incompatible with renewable energy development, the RMPs should be amended to preclude such development and safeguard these resources. For areas that are deemed not suitable for renewable energy development, this determination should be codified in the RMP amendments. Temporary segregation or withdrawal for renewable energy projects, similar to an administrative mineral withdrawal, could be another option. Even if the BLM selects the No Action Alternative for the Lava Ridge project because of cultural or wildlife values or other issues, there is currently nothing in the current RMP that would prevent another project from being proposed in the very same area. If there is always the possibility of such a proposal being developed in an area with conflicting and unresolvable issues, it will be difficult for the BLM and partners to optimize the other values in this area such as restoring habitat for wildlife or additional interpretation of cultural values. If wildlife habitat is determined to be of critical importance, as has been expressed for certain areas of Lava Ridge, then the RMP should be amended to state that these areas are to be managed instead for wildlife habitat conservation and restoration. Likewise, areas with fewer resource conflicts could be optimized for renewable energy development but the RMPA would allow for more strategic and expanded mitigation opportunities. Renewable Energy Conservation Plan The California Desert Renewable Energy Conservation Plan was a public process involving the BLM, the state of California and counties. The plan started out with approximately 20 million acres under review for potential projects and was then narrowed down to some 11 million acres of public lands. Lands not deemed appropriate for energy development were safeguarded with conservation measures to protect local values, while lands that were deemed appropriate for development included mitigation measures and setbacks for wildlife and cultural resource issues. Counties received support to engage in this process. Although this particular process took 8 years, the lessons learned from this process could be applied more strategically and help federal, state and local governments in Idaho address this issue.	
11598-35	Idaho Conservation League	Update and tier to the BLM's Wind and Solar Programmatic EIS The BLM could work with the state, county, Tribal governments, and members of the public to update the BLM's Wind and Solar Programmatic Environmental Impacts Statements for southern Idaho to provide more specific direction similar to the BLM's Solar Energy Development programmatic EIS for western states including CA, NV, NM, AZ, UT, and CO. The BLM could tier to the PEISs and provide a more specific analysis to all RMPs in southern Idaho with an updated review process. Protecting cultural values for Shoshone-Bannock and Shoshone-Paiute Tribal members, as well as for members of the Japanese-American community, will be a critical component to this process.	See responses to comments 11598-34 and 11534-6 (see both in Table A-3jj, Legal or Policy Compliance).
11620-2	Simone Griffin; BlueRibbon Coalition	The Bureau of Land Management is required to show a broad range of alternatives when undertaking a NEPA process. In order to adequately comply with NEPA the BLM must have alternatives that explore a range of alternatives. Closure is not management. These areas provide a purpose and need for outdoor access that improves physical and mental health for public land users.	The BLM analyzed a full range of reasonable alternatives and describes additional alternatives that were considered within the draft EIS and the final EIS. The description of the Alternatives is located within EIS Chapter 2 and the analysis of potential impacts is located within Chapter 3.
11672-2	Teiko Saito	• BLM's Monument Resource Management Plan (RMP) is 38 years old and horribly out of date, as demonstrated by the fact that it fails to (ironically, given the name of the RMP) recognize Minidoka's initial status as a designated National Monument under the Antiquities Act, let alone Minidoka' s subsequent Congressional designation as a National Historic Site that is part of the National Park System. It will be arbitrary and capricious for BLM to make a major land use management decision of the magnitude of Lava Ridge Project based upon such an out-of-date RMP. Accordingly, BLM should logically pause further work on the Lava Ridge Project and first update the Monument RMP, so it accurately reflects the current land use designations, uses and resource values within the RMP planning area.	See responses to comments 11326-9 and 11598-26 (see both in Table A-3jj, Legal or Policy Compliance).
11674-1	Marilyn Broek	The proposed Lava Ridge wind turbine project is to be constructed on Federal public lands. It must be obligated to meet the requirements of this long standing law protecting migratory birds between the United States and Canada, Mexico, Japan, and Russia The proposed Lava Ridge wind turbines draft EIS states up to 11,799 birds will be killed by the turbines every year. It is beyond comprehension that this project can even be considered as acceptable on public lands in our United States. Our federal agencies are required to live within the rules of this Act. So must any private business thinking they can construct and operate on our public lands.	The EIS describes potential impacts to migratory birds and compliance with the MBTA within Section 3.3.2.

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		As a project engineer working on large construction projects located on public and private lands in Idaho for the last 40 years I have delt with this Migratory Bird Treaty Act many times. The scope of the bird kills along with the stated mitigation efforts anticipated for Lava Ridge is a slap in the face to Idaho, the United States, Canada, Mexico, Japan, and Russia. And it is a death warrant for our beloved birds.	
11821-10	Laura Cunningham, Kevin Emmerich, WildLands Defense	Many BLM Resource Management Plans (RMPs) are decades old and in need of revision. As BLM considers the lands that it manages for renewable energy development, BLM cannot rely on outdated information from existing RMPs. Instead, there must be an updated robust environmental analysis at the local level with full public and stakeholder participation. [...] The plans were made before BLM had developed the VRM Class policy. By default, any unevaluated Visual Classes for BLM resource areas are managed as VRM Class IV which encourages development. A fair evaluation of these lands may determine they qualify for VRM Class II or VRM Class III which are more restrictive to energy development.	See responses to comments 11326-9, 11534-2 (see both in Table A-3jj, Legal or Policy Compliance), and 11535-149 (see in Table A-3y, Visual Resources).
11860-12	Shauna Robinson	Monument Resource Management Plan • Even though the Greater Sage Grouse Resource Management Plan from 2015 was used as an update to the 1986 Monument Resource Management Plan, it seems inadequate in addressing the impacts caused by renewable energy projects on public lands, i.e., Lave Ridge. It states that lands rated as General Habitat Management Areas are open to a host of uses, wind energy projects included. The “moderate use” areas are deemed “generally suitable for a wide range of existing and potential uses with no special limitations or restrictions on the type of intensity of resource use,” and “because the siting corridors are in a General Habitat Management Area (GHMA) for Greater Sage Grouse…the area is designated as open to wind-energy development per BLM (2015).”(ES-v, Monument RMP, p.4, p.6) I feel this is inadequate because it does not take into consideration resources other than Greater Sage Grouse in determining locations for wind energy projects. Endemic species of insects, vegetation, or amphibians could inhabit some of those GHMA sections. Perhaps such an area would be part of a flyway used by migrating birds, and, certainly, with the extensive history of human habitation in areas like the Lava Ridge project area, surface and sub-surface artifacts may be there. Consider, too, unique geologic features that can be found in a volcanic plain or features like playas. So, just opening the land to huge energy projects because the habitat may not support Sage Grouse is a mistake. A comprehensive strategy for energy projects is needed that considers all resources.	Also see response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance). The SFO has a history of updating management direction within management plans when a need has been established. Within the EIS the BLM considers impacts to multiple resources and species to understand how the potential impacts relate to laws, regulations, and policies.
11869-5	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	And by failing to account for Idaho’s sovereign interest in its water, the draft EIS also falls short of the requirements of NEPA and the FLPMA. See Ctr. for Biological Diversity v. Dep’t of Interior, 623 F.3d 633, 641 (9th Cir. 2010) (NEPA requires agencies to take “a ‘hard look’ at the environmental consequences of its proposed actions”); see also 43 U.S.C. § 1701(a)(8) (requiring the Bureau to manage public lands in a manner that “will protect the quality of [its] water resource”	The BLM recognizes the State authorities pertaining to the allocation of water resources. The BLM regularly coordinates on broader policies and principles for ensuring the sustainability of water uses on public lands and ensuring these uses comply with state laws. Additionally, the BLM has coordinated with the State of Idaho through our evaluation of the project to ensure that important issues and potential impacts are considered. With the information and expertise that the State of Idaho has provided, the EIS will provide the BLM with what is needed to take a hard look that considers potential impacts to State of Idaho’s interests in our decision on this project. See response to comment 11554-13 (see in Table A-3jj, Legal or Policy Compliance).
11869-6	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	Our Constitution creates a system of “dual sovereignty.” Printz v. United States, 521 U.S. 898, 918 (cleaned up). When the States entered the Union, they “retained a residuary and inviolable sovereignty.” Id. at 919 (quoting The Federalist No. 39 (J. Madison)). One of the states’ retained powers is the right to hold title over all non-navigable waters. United States v. Utah, 283 U.S. 64, 75 (1931). The States have had a “traditional and primary power over . . . water use.” Solid Waste Agency of Northern Cook Cnty. v. United States Army Corps of Engineers, 531 U.S. 159, 174 (2001) (SWANCC); see also 33 U.S.C. § 1251(b) (“It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to . . . plan the development and use (including restoration, preservation, and enhancement) of land and water resources”). So the law has long recognized a state’s ownership of its waters as “an essential attribute of [its] sovereignty.” Idaho v. Coeur d’Alene Tribe of Idaho, 521 U.S. 261, 283 (1997). The draft EIS acknowledges that “all action alternatives” will have “long-term irretrievable impacts on” Idaho’s wetlands and surface waters. DEIS at 3-447. Ground disturbance from building and operating the wind farm will “remove or alter wetlands, change their function, change the rate and quantity of runoff from the fill footprint, compact soils, and alter flow patterns.” DEIS 3-444. The Project could also pollute Idaho groundwater and surface water through inadvertent spills of hazardous materials, soil disruption. DEIS at 3-442, id. at Appendix 3-17–18. The draft EIS irresponsibly entrusts MVE to mitigate these impacts while at the same time conceding that even perfect compliance with these mitigation measures “would reduce but not eliminate potential impacts to wetlands and waters.” DEIS at 3-445. The draft EIS also fails to analyze how these impacts will affect Idaho’s sovereign interests over its waters or even acknowledge that Idaho has such an interest.5	See responses to comments 11869-5 and 11554-13 (see both in Table A-3jj, Legal or Policy Compliance).
11869-7	Raul Labrador, Josh Turner; Idaho Attorney General’s Office	Idaho also has a sovereign interest “in all the air within its domain.” Massachusetts v. EPA, 549 U.S. at 518–19 (cleaned up). The Project appropriates Idaho’s wind for private profit. In doing so, it deprives Idaho of the ability to use state-owned land in the Magic Valley to harvest wind for energy. Wind in Idaho is a resource that belongs to Idaho, and MVE’s use diminishes it for use by Idaho and its people. The draft EIS fails to consider Idaho’s interest in harvesting energy from its own wind.	The BLM recognizes the State of Idaho’s interest and the potential uses of public lands to result in impacts to air. Early in the evaluation of the project the BLM coordinated with the State of Idaho agencies and incorporated them as cooperating agencies in the preparation of the EIS. The BLM has coordinated with State agencies extensively and used information pertaining to the State’s jurisdiction by law and the agencies’ expertise to prepare the EIS and provide a hard look at these issues. The potential impacts to air have been described in the EIS. The BLM recognizes the State authorities and responsibilities for approving land uses including those to harvest wind on state-owned lands. The BLM regularly coordinated with the Idaho Department of Lands on broader policies and principles for ensuring compatible land uses. Additionally, the BLM has coordinated with the State of Idaho through our evaluation of the project to ensure that important issues and potential impacts are considered. With the information and expertise that the State of Idaho has

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			provided, the BLM has prepared an EIS that will provide what is needed to take a hard look that considers potential impacts and the State of Idaho's interests in our decision on this project.
11869-21	Raul Labrador, Josh Turner; Idaho Attorney General's Office	The agency's recommended alternatives do not mitigate the harm. They also would "have irreversible impacts on mule deer and pronghorn from human activities (e.g., vehicle use, construction equipment, maintenance activities), wind turbine operation (e.g. noise, vibration, shadow flicker caused by moving blades) and ground disturbance that would remove or alter habitat." DEIS at 3-485. As noted above, Idaho maintains the right and responsibility to "preserve, protect, and perpetuate" its wild game populations and to "provide continued supplies of such wildlife for hunting, fishing and trapping." Idaho Code § 36-103(a). MVE's devastation to Idaho wild game is a clear invasion of Idaho's legal rights.	See responses to comments 11554-13 (see in Table A-3jj, Legal or Policy Compliance) and 11554-14 (see in Table A-3jj, Legal or Policy Compliance).
11869-23	Raul Labrador, Josh Turner; Idaho Attorney General's Office	Similarly, Idaho has designated several birds as SCGNs that the agency also recognizes will be severely and "irretrievably" harmed by the Project. See, e.g., DEIS at 3-126 (all action alternatives will have irretrievable harm on sage grouse); id. 3-68, 3-78 (ferruginous hawks are "vulnerable to population-level effects from wind energy development). As trustee over its wildlife, Idaho has a special interest in preserving these populations. The draft EIS's failure to account for, or even mention, Idaho's interest in SGCNs is a clear violation of federal law.	See responses to comments 11554-13 (see in Table A-3jj, Legal or Policy Compliance) and 11554-14 (see in Table A-3jj, Legal or Policy Compliance).
11871-9	WildLands Defense	This thwarts a meaningful hard look direct, indirect and cumulative impacts analysis under NEPA. NEPA-compliant hard look systematic science-based comparisons cannot be made unless the full range of pre-decisional biological, cultural and other information is gathered.	See response to comment 11871-14 (see in Table A-3jj, Legal or Policy Compliance).
11871-14	WildLands Defense	Reliance on post-decisional surveys for sensitive and other species and various other values of public land violates NEPA, FLPMA and the Migratory Bird Treaty Act. It violates the Monument RMP protections for sensitive values, the BLM sensitive species policy, BGEPA, the MBTA, the ARMPA, numerous BLM IMs, MOUs and policies. It is impossible to adequately assess the direct, indirect, cumulative and synergistic effects unless the specific project facility/infrastructure locations and other specific data - including for all biota of concern are identified pre-decisionally. Surveys must be conducted pre-decisionally and new analysis provided in a Supplemental EIS for public review and comment prior to any alternatives being developed.	Prior to the preparation of the draft EIS, multiple surveys were completed to gather information fully supporting the BLM's analysis of potential impacts and inform the BLM's decision. Measures described within the EIS identify additional surveys that would be required prior to construction if an authorization is granted to inform the implementation of an approved action in accordance with the required measures and design features.
11871-22	WildLands Defense	https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1002/fee.2456 CEQ Corridors and New Connectivity Guidance A hard look assessment of Lava Ridge's direct, indirect and cumulative impacts on all wildlife seasonal ranges and movement corridor habitats must be assessed in a SEIS. This must also include migration corridors for volant species – but first, of course, a solid baseline of studies and analysis must be conducted. These habitats must be identified across the landscape. See: https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf "Connectivity is the degree to which landscapes, waterscapes, and seascapes allow species to move freely and ecological processes to function unimpeded. Corridors are distinct components of a landscape, waterscape, or seascape that provide connectivity. Corridors have policy relevance because they facilitate movement of species between blocks of intact habitat, notably during seasonal migrations or in response to changing conditions… Increasing connectivity is one of the most frequently recommended climate adaptation strategies for biodiversity management." "To the maximum extent practicable, Federal agencies are expected to advance the objectives of this guidance by developing policies, through regulations, guidance, or other means, to consider how to conserve, enhance, protect, and restore corridors and connectivity during planning and decision-making, and to encourage collaborative processes across management and ownership boundaries. Any existing corridor and connectivity policies or related policies should be updated as needed to align with the objectives in this guidance. Federal agencies should have new or updated policies ready to implement by the first quarter of 2024 and make their policies publicly available. Federal agencies should also actively identify and prioritize actions that advance the objectives set forth in this guidance." "Federal agencies should not limit engagement in restoration activities only to circumstances when restoration serves as a mitigation strategy to compensate for adverse impacts from projects or actions. Instead, Federal agencies should consider where there are opportunities in their programs and policies to carry out restoration with the objective of promoting greater connectivity."	Within the EIS, the BLM fully considers impacts to resources such as wildlife and migratory corridors and considers all applicable laws, regulations, and policies.
11873-2	Mary Schwartz, Frank Schwartz	1. The BLM obviously does not realize the NEPA regulations changed a few years back. This BLM NEPA product for this windfarm proposal is typical old-school NEPA, not adhering to page limits, including analysis in appendices that should be in the body of the document, containing much repetitive and extraneous information, and not acknowledging or analyzing quite a number of environmental impacts to some resource areas. The purpose of the NEPA analysis in an environmental impact statement is to inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies should focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear and to the point and shall be supported by evidence that the agency has made the necessary environmental analyses. The text of final environmental impact statements {paragraphs {a)(4) through (6) of 1502.10) shall be 150 pages or fewer, and for proposals of unusual scope or complexity, shall be 300 pages or fewer unless a senior agency official of the lead agency approves in writing a statement to exceed 300 pages and establishes a new page limit. This DEIS, for 40 CFR 1502.10 {a)(4) through (6), is 508 pages, includes much repetition and extraneous information, and does not include some important analyses that should be included. The appendices to this DEIS are also excessively long, repetitive, contain extraneous information	The BLM follows applicable laws, regulations, and policies that guide the preparation of the EIS and inform the evaluation of proposals like the Lave Ridge Wind Project. This includes making use of reliable existing data and resources to describe the existing conditions and inform the analysis of potential impacts. Throughout the preparation of the EIS the BLM has obtained the relevant data and information needed to prepare the EIS. This information has come from project-specific surveys, publications and analytical documents prepared by cooperating agencies and other reliable resources, and from information supplied by individuals and stakeholder groups.

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		and omit some important information. The company hired to do this NEPA analysis obviously used a recycle approach from other NEPA analyses that they have done in years past, including the same omissions, repetition and extraneous information, which is likely a part the reason this document does not meet the current NEPA regulations and does not address some analyses that are important to informing the decision maker and public. See 40 CFR 1502.	
11886-1	Sandra Eto	I could find no copy of the Monument Resource Management Plan (RMP) on the internet other than that in the Lava Ridge DEIS Literature Cited.2 There was no decision or location map provided with this citation. Therefore, it is difficult to address land use decisions made in the RMP that require the map. Nor is any explanation provided as to why revisions or amendments have not been made since 1986, except for minor fish and wildlife activities related to Greater Sage Grouse habitat.3 Albeit small in acreage, significant changes in land use and transfer areas have occurred within the Monument RMP since 1986: listing of the former Minidoka WRC on the National Register of Historic Places (NRHP) in 1979; Presidential Proclamation 7395 dated January 17, 2001, establishing the National Monument as the 385th unit of the National Park System; Public Law 110-229 dated May 8, 2008, which enlarged the National Monument (and added the Bainbridge Island Japanese American Exclusion Memorial), and changed the designation to the Minidoka NHS. Included in these actions, where appropriate, was the transfer of jurisdiction from the Bureau of Land Management (BLM) to NPS. Most notably there is no recognition in the Monument RMP that there has been a transfer of jurisdiction from BLM to NPS of the 388-acre NHS which—adequately or not—currently represents the original approximately 34,000-acre Minidoka WRC.	The BLM Twin Falls District RMPs are posted on the BLM's ePlanning NEPA Register (https://eplanning.blm.gov) with links to applicable amendments on the RMP ePlanning sites; direct links to the RMP ePlanning sites are available on the BLM website: https://www.blm.gov/programs/planning-and-nepa/plans-in-development/idaho. See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance) and also 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
11991-14	Julie Abo	If the Monument Resource Management Plan is from 1986 and doesn't include visual resource management, this should be revised. Craters of the Moon's Resource Management Plan is from 2007 and includes evaluation of scenic quality. "The SFO Monument Resource Management Plan (BLM 1986b) does not establish Visual Resource Management (VRM) classes or associated management objectives for BLM public lands in the siting corridors; for this reason, conformance with BLM VRM (page 3-396)	Within the EIS the BLM considers impacts to visual resources to understand how the potential impacts relate to laws, regulations, and policies. Also see responses to comments 11326-9 (see in Table A-3jj, Legal or Policy Compliance) and 11535-149 (see in Table A-3y, Visual Resources).
12054-1	Kevin Emmerich	The DEIS is being evaluated based on an outdated Resource Management Plan: The BLM is basing the NEPA review on a very old and outdated Resource Management Plan (RMP) called the Monument Resource Management Plan that was completed in 1986! The plan is so old, it is a scan of a typewritten document and pre-dates modern technology. The plan also neglects to even discuss Visual Resource Management Classes. The Federal Land Policy and Management Act (FLPMA) requires the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values (Inventories, Section 201). Planning, per FLPMA Section 202 instructs that the Secretary of the Interior shall, with public involvement and consistent with the terms and conditions of the Act, develop, maintain, and, when appropriate, revise land use plans which provide tracts or areas for the use of the public lands. The purpose of a Resource Management Plan (RMP) is to: 1. Allocate resources and determine appropriate multiple uses for the public lands; 2. Provide a strategy to manage and protect resources; 3. Establish systems to monitor and evaluate the health of resources and effectiveness of practices. RMPs are like a public lands version of municipal zoning. Examples of situations that may require new or changed land-use plan decisions include: The Bureau of Land Management evaluates and amends or revises its land-use plans in response to changing conditions and demands on the public lands, or when new components are added to the National Conservation Lands that it manages. Keeping a plan up-to-date helps ensure that the BLM manages the public lands in ways that meet the multiple-use and sustained yield goals that Congress has set for these lands. Examples of situations that may require new or changed land-use plan decisions include: The Monument RMP is 36 years old and in that timeframe, values, visitation and use of the area have changed. The Minidoka National Historic Site was established in 2001, 18 years after the Monument RMP was released. The Minidoka National Historic commemorates the more than 9,000 Japanese Americans who were imprisoned at the Minidoka War Relocation Center during the Second World War. Cultural landscapes, viewsheds, historic structures and archeological sites are all identified as fundamental resources and values by the National Park Service for the Minidoka National Historic Site. The National Park Service defines a cultural landscape as a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values. Equally, the visitation statistics for the Craters of the Moon National Monument have changed. We learned from personal communication with the National Park Service that visitation has nearly doubled since 1986 with annual visitation that year at 178.332 compared to 2021 annual visitation at 270,829. This is a significant increase since 1986.	See responses to comments 11991-14 (see in Table A-3jj, Legal or Policy Compliance) and 11535-149 (see in Table A-3y, Visual Resources).
12054-3	Kevin Emmerich	Two New Significant Land Use Plans must be Considered for Purpose and Need and Alternatives: The BLM is reviewing a new western renewable energy plan that emphasizes "exclusion criteria" based on resource conflicts. The 2023 update to the solar programmatic environmental impact statement is reviewing the 2012 Western Solar Plan which created Solar Energy Zones, Variance Lands and Exclusion Zones. The BLM is considering adding wind energy to this review. When the updated plan is approved, it could require a Plan Amendment to the Monument RMP. This would be a potential opportunity to create a Renewable Energy Exclusion Zone.1 As the BLM states: "The identification of exclusion areas allows the BLM to support the highest and best use of public lands by avoiding potential resource conflicts and reserving for other uses public lands that are not well suited for utility-scale solar energy development. Because of the size and scale of utility-scale solar energy development (typically involving a single use of public lands), the BLM has excluded a broader set of categories from utility-scale solar energy development than would be identified in a land use	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).

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		plan for other types of ROWs."2 This of course can also apply to wind energy. The point is that a land use plan amendment can be used to protect the local resources.	
12054-10	Kevin Emmerich	There are two ways to change an RMP: Plan revisions: Plan revisions involve a complete or near-complete rewrite of an existing land- use plan. A plan revision always requires a full Environmental Impact Statement. Plan amendments: Plan amendments modify one or more parts of an existing land-use plan, for example, allowing the development of wind energy resources where they had not previously been considered. Depending on how wide-ranging the effects of an amendment would be, the BLM will prepare either an Environmental Assessment or a full EIS to accompany a plan amendment. The BLM moved forward with the review of the Lava Ridge Project and before the Monument Resource Management Plan was revised. Approving the Lava Ridge Project without any kind of RMP update is a form of BLM streamlining and is irresponsible because it limits the opportunity of the public to oppose the project.	See response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance). The BLM has not limited opportunities for public involvement in the NEPA process for the project.
12130-3	Brenda Pace	While most project components would be located on BLM public lands, several privately owned, State of Idaho–owned, and Bureau of Reclamation-owned parcels are also present in the Lava Ridge Wind project area. The DEIS suggests that these would "provide opportunities to locate additional wind turbines, collector and transmission lines, and potentially other ancillary components" (DEIS pg. 2-1 and pg. 3-262). The likelihood of additional development on non-BLM lands inside the project area should have been discussed in the DEIS, as part of Chapter 3, "Affected Environment and Impacts," but I have not been able to identify this discussion in the DEIS. I am particularly concerned that there will be no environmental review or mitigation for Lava Ridge Wind project developments on State and private lands. For cultural resources, this likelihood is stated clearly "Where federal permitting and law do not apply (e.g., on state or private lands), cultural resources identification efforts might not occur, and impacts might go unmitigated" (DEIS 3-165). Since Lava Ridge Wind project developments on non-BLM lands would be linked to the federal action evaluation in the DEIS, I believe that they must be subject to the same level of environmental review and mitigation. I request that BLM confirm that Lava Ridge project developments on non-BLM land are included in the NEPA analysis and all of the mitigations contained within and provide justification if they are not.	The EIS analysis describes impacts associated with all components of the project including those that would occur off of public lands. The location of the project components was discussed in Section 2.3.1 of the draft EIS.
12307-1	Dean Dimond	I share the content on the most recent EO and must challenge the far-reaching and barricade to true NEPA analysis that it represents in this draft EIS. Without sounding disrespectful, this EO breeches the authority of the BLM to change the criteria for analysis of environmental impacts of this wind project by removing the existing contributions and of the loss of production of other energy sources within BLM authorities. Without the impact of the loss of other energy production included in this DEIS, the American people cannot assess the need, capacity and or the impact of this wind development project to meeting the domestic energy needs of the American people, the energy grid security and other aspects covered in this EO. To illustrate my comment, an excerpt from EO 14008 signed January 27, 2021 by President Biden follows: "Sec. 207. Renewable Energy on Public Lands and in Offshore Waters. The Secretary of the Interior shall review siting and permitting processes on public lands and in offshore waters to identify to the Task Force steps that can be taken, consistent with applicable law, to increase renewable energy production on those lands and in those waters, with the goal of doubling offshore wind by 2030 while ensuring robust protection for our lands, waters, and biodiversity and creating good jobs. In conducting this review, the Secretary of the Interior shall consult, as appropriate, with the heads of relevant agencies, including the Secretary of Defense, the Secretary of Agriculture, the Secretary of Commerce, through the Administrator of the National Oceanic and Atmospheric Administration, the Secretary of Energy, the Chair of the Council on Environmental Quality, State and Tribal authorities, project developers, and other interested parties. The Secretary of the Interior shall engage with Tribal authorities regarding the development and management of renewable and conventional energy resources on Tribal lands. Sec. 208. Oil and Natural Gas Development on Public Lands and in Offshore Waters. To the extent consistent with applicable law, the Secretary of the Interior shall pause new oil and natural gas leases on public lands or in offshore waters pending completion of a comprehensive review and recon- sideration of Federal oil and gas permitting and leasing practices in light of the Secretary of the Interior's broad stewardship responsibilities over the public lands and in offshore waters, including potential climate and other impacts associated with oil and gas activities on public lands or in offshore waters. The Secretary of the Interior shall complete that review in consultation with the Secretary of Agriculture, the Secretary of Commerce, through the National Oceanic and Atmospheric Administration, and the Secretary of Energy. In conducting this analysis, and to the extent consistent with applicable law, the Secretary of the Interior shall consider whether to adjust royalties associated with coal, oil, and gas resources extracted from public lands and offshore waters, or take other appropriate action, to account for corresponding climate costs. Sec. 209. Fossil Fuel Subsidies. The heads of agencies shall identify for the Director of the Office of Management and Budget and the National Climate Advisor any fossil fuel subsidies provided by their respective agencies, and then take steps to ensure that, to the extent consistent with applicable law, Federal funding is not directly subsidizing fossil fuels. The Director of the Office of Management and Budget shall seek, in coordination with the heads of agencies and the National Climate Advisor, to eliminate fossil fuel subsidies from the budget request for Fiscal Year 2022 and thereafter. Sec. 210. Clean Energy in Financial Management. The heads of agencies shall identify opportunities for Federal funding to spur innovation, commercialization, and deployment of clean energy technologies and infrastructure for the Director of the Office of Management and Budget and the National Climate Advisor, and then take steps to ensure that, to the extent consistent with applicable law, Federal funding is used to spur innovation, commercialization, and deployment of clean energy technologies and infrastructure. The Director of the Office of Management and	Climate impacts of all existing energy production is outside the scope of the project and EIS. See response to comment 11491-1 (see in Table A-3jj, Legal or Policy Compliance).

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		Budget, in coordination with agency heads and the National Climate Advisor, shall seek to prioritize such investments in the President's budget request for Fiscal Year 2022 and thereafter." I contend that the measurements of climate impacts of existing energy production have not been analyzed to address the true environmental impacts (positive and adverse) of the addition of this wind project. This alone creates a fatal flaw in this DEIS for the Lava Ridge wind project.	
12307-9	Dean Dimond	My first concern for this draft EIS is that it has not been developed strictly according to the Congressionally mandated criteria of the National Environmental Policy Act, as amended. It includes two Executive Orders (EOs) written to address Environmental Justice (President Clinton 1994) and another regarding Climate Change (President Biden 2021). Although the power of an EO is effective in steering our Nation in effective ways toward addressing issues of great concern, I must point out that the criteria for the NEPA analysis of a project must include the actual conditions on the ground and the interdisciplinary effects of a project on federal lands.	The EIS was prepared considering project-specific issues and project-specific impacts in accordance to the applicable laws and policies, including NEPA.
1231-1	Carolyn Dimond	We have discovered that: The zoning for this area of BLM ground in all three counties (Jerome, Minidoka, Lincoln) is A1- Agriculture. In order for windmills to be built in A1 zone it requires a special use permit from each county. Realizing that BLM is exempt from local zoning laws, LS power is a private company and is not exempt but subject to all local zoning laws. The Federal Land Policy Management Act confirms this. LS power has not included or even applied for this required special use permit that must be included in the DEIS. Along with that requirement, there are other state owned lands managed by the state in conjunction with the BLM, known as school sections, checkered board across the proposed area that clearly require all local zoning laws be followed. (see permit application for state lands) These permits have not been obtained and LS Power cannot be permitted to continue with this project.	The system of public lands managed by the BLM are not under the jurisdiction of county planning and zoning laws and regulations. The BLM uses land use plans to establish what actions and protections are appropriate for public lands within the planning area. The BLM considers State and local plans in the preparation of land use plans to ensure there is consistency to the maximum extent as allowable under other laws and fulling the purpose of FLPMA. This, however, does not mean that an applicant requesting the use of public lands is required to obtain a permit from the county as there is no development proposed on private property within the jurisdiction of the local government. MVE has applied for or will be required to apply for the use of the State sections, managed by the Idaho Department of Lands, that are incorporated within the project proposal. These State lands are not within BLM's jurisdiction and although the EIS considers impacts on these lands as part of the larger project the BLM is not delegated authority to approve or deny the use of the State lands.
12371-4	Alan Hansten; Northside Canal Company	NSCC would note that the Idaho Legislature recently passed House Concurrent Resolution No. 4 where the House and Senate unanimously voted to support a "no-build" option for the Lava Ridge Project. Alternative A or the "no action" alternative is the only alternative that would fall in line with the Legislature's position. In addition, Jerome County and several other local counties have all opposed the project as negatively impacting area citizens. HCR 4 identifies concerns to Idaho's agriculture and citizens which would include NSCC's shareholders as well. NSCC requests that the BLM strongly consider the Idaho Legislature's statement and the local county commissioners' positions on this issue in formulating the final EIS.	The counties and state agencies have participated in the preparation of the EIS as cooperating agencies and the BLM has received and considered all stakeholder feedback in the preparation of the EIS.
12398-23	US Environmental Protection Agency	Permits and Authorizations The EPA is aware that project construction will be contingent upon completion of the environmental planning and review process under NEPA and regulatory approvals that may be outstanding or subject to modification at the end of the NEPA process. These include CWA Sections 401 and 404 authorizations, Historic Properties Management Plan, an Eagle Conservation Plan, an Air Quality Permits, a Stormwater Pollution Prevention Plan, among others. EPA therefore recommends that the FEIS include information on all authorizations (federal, state, local government, etc…) that will be necessary for the project and highlight any changes to significance determinations or additional conditions. In a consolidated fashion (as a narrative or table in the FEIS), present the status of all permits or approvals needed by the project to help the public and responsible agencies better understand the scope of work and assist with construction planning and scheduling, as well as measures to reduce risks to environmental resources.	Other federal, state, and local permit requirements are described in Section 1.5 of MVE (2023).
12398-25	US Environmental Protection Agency	The DEIS identifies underserved communities that face disproportionate impacts within the project area, including the Japanese American community, Native Americans, and low income and minority populations. The proposed project has the potential to have significant disproportionate impacts to these identified communities, including cultural impacts to historically important sites. In reviewing the EJ analysis of the DEIS, EPA utilized several key documents and policies for considering and addressing EJ concerns within NEPA analyses, which are further described in the following. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations2, requires "each Federal agency… make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effect of its programs, policies, and activities on minority populations and low- income populations in the United States… " As noted in the Guidance from CEQ on Environmental Justice and the National Environmental Policy Act3 (CEQ EJ Guidance): "NEPA's fundamental policy is to "encourage productive and enjoyable harmony between man and his environment" . . .The following goals, set forth in NEPA, make clear that attainment of environmental justice is wholly consistent with the purposes and policies of NEPA . . . to assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings". . . and "preserve important historic, cultural, and natural aspects of our natural heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice" The CEQ EJ Guidance goes on to state "Agencies should recognize that the question of whether agency action raises environmental justice issues is highly sensitive to the history or circumstances of a particular community or population, the particular type of environmental or human health impact, and the nature of the proposed action itself" and provides six principles as general guidance for identifying and addressing environmental justice. These principles include: • "Agencies should recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effect of the proposed agency action. These factors should include the physical sensitivity of the community or population to particular impacts; the effect of any disruption on the community structure associated with the proposed action; and the nature and degree of the impact on the physical and	The BLM considers laws, regulations, and policies related to evaluating potential impacts to environmental justice communities. The potential impacts to these communities are described in the EIS in Section 3.6.

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		social structure of the community." • "Agencies should assure meaningful community representation in the process. Agencies should be aware of the diverse constituencies within any particular community when they seek community representation and should endeavor to have complete representation of the community as a whole." The CEQ EJ Guidance identifies four important ways to consider EJ under NEPA, including: • "Mitigation measures identified as part of . . .an environmental impact statement (EIS), or a record of decision (ROD), should, whenever feasible, address significant and adverse environmental effects of proposed federal actions on minority populations, low-income populations, and Indian tribes." • "Each Federal agency must provide opportunities for effective community participation in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of public meetings, crucial documents, and notices." • "Review of NEPA compliance (such as EPA's review under § 309 of the Clean Air Act) must ensure that the lead agency preparing NEPA analyses and documentation has appropriately analyzed environmental effects on minority populations, low-income populations, or Indian tribes, including human health, social and economic effects."4 Finally, the CEQ EJ Guidance specifies that: • "When the agency has identified a disproportionately high and adverse human health or environmental effect on low-income populations, minority populations, or Indian tribes from either the proposed action or alternatives, the distribution as well as the magnitude of the disproportionate impacts in these communities should be a factor in determining the environmentally preferable alternative. In weighing this factor, the agency should consider the views it has received from the affected communities, and the magnitude of environmental impacts associated with alternatives that have a less disproportionate and adverse effect on low- income populations, minority populations, or Indian tribes." • "Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmental unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population."	
12469-5	Mike Telford	The DEIS in 3.8.1 talks about land use authorities. It sites 1986 land use documents. Those are out dated and are in the process of being rewritten. New ordinances are being drafted to oppose these large scale wind projects All this alone should compel BLM to decide Alternative A is the only answer.	See responses to comments 12371-4 (see in Table A-3jj, Legal or Policy Compliance) and 11326-9 (see in Table A-3jj, Legal or Policy Compliance).
12859-10	Kristen Brengel, Robyn Achilles; Friends of Minidoka	The Department of the Interior via the BLM has a duty to protect Minidoka The Federal Land Policy and Management Act (FLPMA) requires the Interior Department and BLM to: • "Protect public land values including air and atmospheric, water resource, ecological, environmental, and scenic values," and to preserve and protect "certain public lands in their natural condition," and "food and habitat for fish and wildlife,"104 • Account for "the long-term needs of future generations;"105 • Prevent "permanent impairment of the productivity of the land and quality of the environment;"106 and • Shall "take any action necessary to prevent unnecessary or undue degradation of the lands."107 While these substantive obligations have existed since the passage of FLPMA in 1976, BLM has not properly applied these land and resource management requirements in the Monument RMP or the Lava Ridge DEIS. Instead, the BLM chooses preferred alternatives that would run counter to FLPMA's requirements, Minidoka specific statutes, laws of general applicability and environmental justice.	See responses to comments 11554-13 and 11598-26 (see both in Table A-3jj, Legal or Policy Compliance).
12859-11	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Among FLPMA's requirements, BLM must adhere to 43 USC §1701(a)(8) which provides for protection of scenic and historical values: [Regs quoted and citations included in full pdf letter, pages 23-26] Furthermore, FLPMA's definition of "multiple use" in 43 USC 1702(c) includes scenic and historical values: [Regs quoted and citations included in full pdf letter, pages 23-26] Additionally, when considering multiple renewable energy projects, BLM regulations require it to apply screening criteria to prioritize wind energy development applications with a goal to reduce resource conflicts.108 Low-priority applications, which may not be feasible to authorize, include those for projects sited on land "near or adjacent to lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which may be adversely affected by development."109 Here, the proposed project meets the criteria for a "low-priority" designation because it is sited on land "near or adjacent to … units of the National Park System." As stated in an 2022 Instruction Memorandum relating to initial screening and prioritization for solar and wind energy applications, "BLM's objective is to facilitate solar and wind projects with the greatest technical and financial feasibility and the least anticipated natural and cultural resource conflicts on BLM-administered lands."111 BLM has incorporated the prioritization principles in its new Idaho Renewable Energy Strategy, which it adopted in early 2023, after beginning the Lava Ridge wind project NEPA process.112 In addition, BLM's Best Management Practices (BMPs) include siting wind projects outside of sensitive viewsheds, or as far as possible from sensitive viewing locations, including units of the National Park System: [Regs quoted and citations included in full pdf letter, pages 23-26] Incomplete list of authorities. In our comments in support of the ACEC designation (above) and regarding the relationship to statutes, regulations and other NEPA Documents (below), we demonstrate requirements for BLM to protect Minidoka's cultural resources through BLM's authorities and congressional direction that Minidoka and other incarceration sites should be protected and interpreted as part of a comprehensive network to tell the whole story of America. BLM's current list of authorities in the Purpose and Need section of the DEIS and Appendix 2	BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyze impacts, and inform the BLM's decision. The project is being proposed on public lands managed by the BLM. The location of project infrastructure would be located in areas adjacent to Minidoka NHS, a site managed by the NPS, but no portion of the project would be located on lands within the jurisdiction of the NPS. The NPS is a cooperating agency, and the BLM has worked with them closely to ensure the EIS evaluates potential impacts to the NPS units and associated resources. The NPS is also participating as a consulting party within the Section 106 process and has actively participated in the preparation of the PA that would stipulate the process necessary to comply with Section 106 obligations. Also see response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).

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		"Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations and Policies" is incomplete and does not include relevant statutory and Executive Branch authorities. While the DEIS lists only partial authorities relating to Minidoka and Japanese American incarceration sites, BLM lists one industry-backed legislative rider in an appropriations bill that establishes a nationwide goal for renewable energy.114 Congressional intent and "Better fitting statutes." The Property Clause of the U.S. Constitution vests Congress with the power to manage public lands.115 Congress has directed that Minidoka and other Japanese American incarceration sites, including the Bainbridge Island Japanese American Exclusion Memorial, Amache, Manzanar, Tule Lake, and Honouliuli, be managed unimpaired for the benefit of current and future generations, as required by the NPS Organic Act, the Redwoods Act and other statutes. [Regs quoted and citations included in full pdf letter, pages 23-26] In the absence of direct and specific Congressional authority to derogate Minidoka's "values and purposes," as required by the Redwoods Act of 1978, BLM lacks the authority to impair Minidoka's fundamental resources and values.122 BLM lacks authority to issue a permit that damages Minidoka NHS. FLPMA's permitting provisions also preclude BLM from issuing permits which "damage federal property."123 The NPS has highlighted the Lava Ridge proposal's significant negative impacts on federal lands it manages as part of the National Park System.124 Based on federal law relating to deference to agency interpretation of its own statutory authority, determination of what constitutes protection under the NPS Organic Act, NHPA and other NPS statutes is best made by NPS.125 BLM must choose an alternative that does not allow development within the viewshed of Minidoka National Historic Site. It is well within BLM's authority to make decisions regarding land use authorizations that protect National Park System units and resources.126 Development adjacent to NPS units can result in significant impacts to park resources and values, as well as the ability for current and future visitors to experience parks "unimpaired," as intended by the 1916 National Park Service Organic Act. [Regs quoted and citations included in full pdf letter, pages 23-26]	
12859-13	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Japanese American Confinement Sites Act. In 2006, Congress passed bipartisan legislation "to provide for the preservation of the historic confinement sites where Japanese Americans were detained during World War II."143 Known as the Japanese American Confinement Sites Act (JACS), the Act directed the Secretary of the Interior to: … create a program within the National Park Service to encourage, support, recognize, and work in partnership with citizens, Federal agencies, State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation's commitment to equal justice under the law."144 Because the law defines historic confinement sites to include the Minidoka Relocation Center, which includes approximately 33,000 acres as depicted in Figure 9.2 from the NPS's Confinement and Ethnicity publication, we ask that BLM list this statute in its list of applicable laws and consider the intent of Congress.145 In 2022, Congress reauthorized and expanded the Japanese American Confinement Sites Act via the Norman Y. Mineta Japanese American Confinement Education (JACE) Act.	Public Law 109-441 Japanese American Confinement Sites Act, as amended by Sec 644 of the Consolidated Appropriations Act of 2023, titled the Norman Y. Mineta Japanese American Confinement Education Grants was added to the list of Federal Regulations in EIS Appendix 2. The project is being proposed on public lands managed by the BLM. The location of project infrastructure would be located in areas adjacent to Minidoka NHS, a site managed by the NPS, but no portion of the project would be located on lands within the jurisdiction of the NPS. The NPS is a cooperating agency, and the BLM has worked with them closely to ensure the EIS evaluates potential impacts to the NPS units and associated resources. The BLM considered impacts associated with Minidoka NHS in EIS Sections 3.5 (Cultural Resources) and 3.6.1 (Environmental Justice Communities). See also response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding the addition of new Section 3.19.
12934-8	Rob Thornberry, Theodore Roosevelt Conservation Partnership	Programmatic EIS encouraged. The TRCP encourages the BLM to undertake a programmatic environmental impact study for all wind projects in Idaho. The Lava Ridge proposal is the first of many to be considered by Idaho BLM in the coming years, and it will set expectations for other applicants in the future. Still, we believe taking a statewide look at wind development issues will lead to less confusion about this and future projects; potentially fewer criticisms, and ultimately better project proposals that adequately consider historic uses of public lands, which include hunting and other types of recreation.	See response to comment 11598-34 (see in Table A-3jj, Legal or Policy Compliance).
12968-1	Charles Brockway	The Federal Land Policy Management Act does not require that the BLM consider this application. FLPMA certainly requires that public land be managed for multiple uses but does not require consideration of any particular application for generation of electric energy. BLM has made the decision to consider the application in the face of widespread public opposition.	See response to comment 12968-5 (see in Table A-3jj, Legal or Policy Compliance).
12968-5	Charles Brockway	No consideration was made of the land-use efficiency of wind farms as opposed to other established power generation technologies. Wind farms normally have total land requirements ranging from 40 to 80 acres per installed megawatt capacity, as opposed to coal, natural gas, and nuclear facilities at 12 to 13 acres per megawatt. But the proposed action has an incredible land use of 160 acres per megawatt or about 2.7 times the average for wind farms and 13 times the typical coal or nuclear plant land use requirement. If a similar calculation is made over the total life of the wind farm, the intermittent nature of wind makes the project even less viable: the land area per total megawatt-hour generated increases to about 20 times that of coal, natural gas, and nuclear. The BLM is charged with managing public lands in an optimal manner for multiple public uses. The proposed wind project should be rejected on its face as a grossly inefficient and wasteful use of public land resources. Approval of the proposed action would be contrary to the agency's legal obligation. The alternatives evaluated in the EIS are not actual alternatives - they are just slight variations on the same land-intensive, inefficient technology.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyze impacts, and inform the BLM's decision. Within the EIS, the BLM fully considers impacts to resources and considers the potential impacts and how they relate to laws, regulations, and policies. See response to comment 11188-5 (see in Table A-3jj, Legal or Policy Compliance).
12968-6	Charles Brockway	Wind has an extremely low generating efficiency. Typical wind-to-wire efficiency is 20 to 40%, on par with solar farms. Modern coal-fired plants have efficiencies of 45 to 55%, and combined-cycle gasification facilities can reach 55 to 60%. Hydroelectric plants have typical water-to-wire efficiencies of 60 to 75%. Allowing such an inefficient and wasteful technology on public land is contrary to the BLM's land use management obligation.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyze impacts, and inform the

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			BLM's decision. Within the EIS the BLM fully considers impacts to resources and considers the potential impacts and how they relate to laws, regulations, and policies. See response to comment 11188-5 (see in Table A-3jj, Legal or Policy Compliance).
12982-2	Jerry Taylor	The Draft Lava Ridge Wind Project EIS (DEIS) is long on volume, short on analysis, and is premature. Critical steps were skipped and vital data were not collected or analyzed. The DEIS is insufficient and BLM should suspend the EIS process, until such time as critical data is collected, properly analyzed and the impacts are disclosed in full. ... The DEIS relies too much on future studies (like "Geo Technical studies"), which should be conducted upfront to properly inform the impacts section of the DEIS. It relies too much on future mitigation (involving future inventory, analysis, agreements, plans and "mitigation compensation"), at the expense of cumulative impact analysis upfront. It arbitrarily dismisses potentially significant impacts without substantive data, analysis or reasonable justification. It relegates these potentially significant impacts to "Issues Analyzed in Brief' (Appendix 3) and/or future "Mitigation" (Appendix 4). It relies heavily on future inventory, plans and agreements to address potentially significant impacts. This approach is flawed, as disclosure of reasonably foreseeable significant impacts on the human environment are not available upfront to inform the public and the decision maker. The BLM should compel MVE to collect the required data up front, so it can be analyzed and the impacts can be described and disclosed. The lack of needed information or data is not a sound rationale for arbitrarily dismissing potentially significant impacts, or deferring to future actions promised, in lieu of analysis upfront. Impact analysis, particularly cumulative impact analysis, and the disclosure of such analysis to the decision maker and to the public is dependent on the agencies' due diligence upfront. What is presented in the DEIS is a piecemeal approach to planning, which I believe you will find has been rejected by the courts in other cases. The BLM must do its due diligence upfront. Gather sorely needed data, analyze it and fully disclose the impacts (individual and cumulative) before moving forward.	Prior to the preparation of the draft EIS multiple surveys were completed to gather information fully supporting the BLM's analysis of potential impacts and inform the BLM's decision. Measures described within the EIS identify additional surveys that would be required prior to construction if an authorization is granted to inform the implementation of an approved action in accordance with the required measures and design features. NEPA as amended guides the agencies on information source by identifying that agencies may make use of any reliable data sources and clearly stating that it is not required to undertake new scientific or technical research unless the new scientific or technical research is essential to a reasoned choice among alternatives. Additionally, if agencies are requiring new scientific or technical research, they should consider if the overall costs and time frame for obtaining it are reasonable.
12982-3	Jerry Taylor	The Code of Federal Regulations (40 CFR 1500 Chapter V) lays out the Purpose, Policy, and Mandate for NEPA regulations. It provides direction to Federal agencies on what they "must do" to comply with NEPA. For example: "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail." Furthermore, "Environmental Impact Statements shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses." The draft EIS fails to comply with the regulations, in its current state. Sufficient information currently does not exist to describe and analyze potentially significant impacts and declare them in the DEIS.	See response to comment 12982-2 (see in Table A-3jj, Legal or Policy Compliance).
12982-4	Jerry Taylor	In preparing an EIS, BLMs own NEPA Handbook (H-1790-1) instructs that: "Early in the process, the lead office should begin to identify information and data needs and availability. Generally this will involve: reviewing and organizing existing information and data; determining what additional information or data are needed, including the level of detail; obtaining additional information and data; and determining if there is any incomplete or unavailable information." In addition, the NEPA Handbook says, in part, "Information needs are primarily determined by the extent to which the proposed action and alternatives are likely to affect the quality of the human environment ... 11 It also says, in part, that "Enough information about the proposed action and alternatives and environmental setting must be available to analyze potential impacts." The draft EIS fails to comply with BLMs NEPA Handbook. Enough information is not available on the environmental setting, the proposed action or alternatives to analyze potentially significant impacts. The Federal Land Policy and Management Act of October 21, 1976, Title 2, Section 201(a) states, in part, " ... the Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values ... ". The BLM doesn't have the inventory base it needs to go forward with the EIS process, at this time.	See response to comment 12982-2 (see in Table A-3jj,Legal or Policy Compliance).
13006-31	Leon Smith	4) Recommend that the conformance section be rewritten to find that the proposal does not conform with the Monument RMP because of the plan's requirement to protect sensitive values, including Minidoka Traditional Cultural Property (TCP).	The EIS addresses conformance with the land use plan in EIS Appendix 2.
13006-33	Leon Smith	7) Recommend that BLM adopt protective measures for the cultural landscape and heritage of wise multiple use. 8) Recommend BLM begin a public process to amend the Monument RMP to designate protective measures around Minidoka and other wise multiple uses, subject to valid existing rights.	The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based the information specific to the project. The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands. Additionally, the BLM has determined that the Proposed Action and range of reasonable alternatives needed to meet the purpose and need are in conformance with the *Monument Resource Management Plan* (BLM1986), as amended. Therefore the preparation of a land use plan amendment to designate protective measures around Minidoka NHS is outside the scope of the EIS. See response to comment 11598-26 (see in Table A-3jj, Legal or Policy Compliance).
1605-2	Dean Dimond	The Zoning for this area of BLM ground in all three counties (Jerome , Lincoln, Minidoka) is A1 Agriculture. In order for a windmill to be built in A1 zone it requires a special use permit from each county. While we realize the BLM is exempt from local zoning laws LS power is NOT the BLM. LS power is a Private company thus they are subject to all Local laws. The FLPMA confirms this. LS power has failed to obtain the REQUIRED or even	The system of public lands managed by the BLM are not under the jurisdiction of County Planning and Zoning laws and regulations. The BLM considers State and local plans in the preparation of land use plans to ensure there is consistency to the maximum extent as allowable under other laws and fulling the purpose of FLPMA. This, however, does not mean that an applicant requesting the use of public lands is required to obtain a

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		apply for the required special use permit. LS Power must obtain the required special use permits to be included in the DEIS. There are also many sections of state owned land, known as school sections, checkered board across the proposed area. These lands are managed by the state in conjunction with the BLM. These lands also clearly require that all local zoning laws be followed. (See permit application for state lands)	permit from the county as there is no development proposed on private property within the jurisdiction of the local government. The county commissioners from Lincoln, Jerome, and Minidoka Counties have been coordinated with as a cooperating agency throughout preparation of the EIS. As a local agency with jurisdiction by law over adjacent private lands and memorandum of understanding was entered into outlining the counties responsibilities for adjudicating the Proposed Action and alternatives with local planning and zoning ordinances. During reviews of the administrative draft EIS the counties did not identify an action that would require MVE to obtain a special use permit from the county. See response to comment 1231-1 (see in Table A-3jj, Legal or Policy Compliance).
1968-2	Dean Dimond	In reviewing the DEIS I can not find were they have addressed or made any agreement with the permit holders to run cows on the affected properties. My farm shares common boarder with the BLM. Through the years I have developed a crop rotation that helps midigate problems that arise to the fields that boarder the desert. For example: it is a fact that grazing the desert help control fires and Voles. On years when I know that they are not going to graze the desert or they have a late season turn out .I avoid planting small Grain in these fields. This helps reduce the risk of fire coming of the desert onto my place The opposite is also true. On these years I try to plant a green crop next to BLM. I also know that the risk of fires go way up with the more people you have on the desert. Is LS power prepared to pay for damages they cause to my place? The same for the voles, deer, elk and other wildlife as they disrupt the habitat. Is LS power going to pay me for those damages? It is going to affect ground miles away from the windmill area. I have heard that LS power is considering purchasing AMUs to offer the cattlemen as mitigation. The BLM allowing LS power to purchase/rent AMUs is wrong on so many levels. but we cannot even speculate on the problems this will cause because it isn't in the DEIS. In addition I count on my crop residue in the fall the feed my cattle. With the increased actively on the desert and the destruction of the wildlife habitat the wildlife is going to find its way to my farm. The DEIS is missing information on all of this.	The draft EIS and subsequently the final EIS, as warranted, describes potential impacts associated with these issues and other issues identified by stakeholders during the scoping period and public comment period. For a full discussion on potential impacts and a description of the Proposed Action and alternatives, please refer to Chapters 2 and 3 of the EIS, specifically Section 3.9 (Livestock Grazing).
2565-1	WildLands Defense	Courtney said he was not aware of any findings that would shut down all renewable projects in the area, but that a process did exist to amend resource management plans to create exclusion areas=94. Here's what CAN be done. And what we believe what needs to be done - given the terrible Eagle death toll, the intrusion on homes and quality of life, how ancient the Land Use Plans are, and the great public opposition to this monstrosity. Please prepare a Supplemental DEIS with an alternative that amends the affected Land Use Plans to makes land UNAVAILABLE to industrial wind farms and other industrial energy.	The BLM has prepared a full and detailed analysis with robust public participation with the NEPA process supporting requirements for a hard look in BLM decision-making. After the public comment period for the draft EIS the BLM responded to comments by • modifying alternatives as supported by analysis or comments; • improving or modifying analysis after considering information from comments; • making factual corrections; and • adding detail or adjustments to mitigation measures supported by analysis or comments. The BLM's NEPA policy that a supplemental analysis is not warranted unless the BLM • makes substantial changes to the Proposed Action that are relevant to environmental concerns; • adds a new alternative that is outside the spectrum of alternatives already analyzed; or • there are significant new circumstances or information relevant to environmental concerns and bearing on the Proposed Action or its effects. In our review of comments and preparing the final EIS, the BLM did not make any of these adjustments warranting supplementation. The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based the information specific to the project. The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands. Additionally, the BLM has determined that the Proposed Action and range of reasonable alternatives needed to meet the purpose and need are in conformance with the *Monument Resource Management Plan* (BLM1986), as amended. Therefore, the preparation of a land use plan amendment to designate lands as unavailable to wind energy projects is outside the scope of the EIS.
2939-6	George Solverson	I believe the scope and detail of the LRWP cumulative effects analysis does not meet the legal requirement under the National Environmental Policy Act (NEPA) based on the following: • The Shoshone Field Office was specifically excluded for tiering to the 2005 USDI BLM Wind Energy Programmatic EIS (PEIS). • The LRWP EIS attempt to incorporate by reference to the PEIS fails the NEPA compliance test given the following: PEIS stated 20-year effects analysis horizon is near the end; referenced studies, research, and data in the PEIS is outdated, and the PEIS did not evaluate the cumulative effects based on the accelerated scale of proposed DOI activities (25 gigawatt by 2025).	See EIS Section 3.1.2.2 (Tiering to the 2005 Programmatic Wind Environmental Impact Statement). Although SFO land management planning was not amended by BLM (2005b), the BLM (2005a) analysis includes the area managed by the SFO, and therefore some of the analysis (BLM 2005a) and the BLM (2005b) BMPs are relevant for the Lava Ridge Wind EIS. As appropriate, this EIS uses conclusions and BMPs from BLM (2005a) and BLM (2005b). These are referenced in the issues analyzed in detail (Chapter 3) and in EIS Appendix 3 (Issues Analyzed in Brief). Potential site-specific impacts and impacts not disclosed in detail in BLM (2005a) are discussed in this EIS. See response to comment 11534-6 (see in Table A-3jj, Legal or Policy Compliance).
3780-1	Stephanie Novacek, Ron Novacek	It is very interesting to read BLM's purpose statement "The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." To date, the local BLM has pretty much adhered to their proclaimed mission statement; however, I fail to understand how passing approval of the Lava Ridge proposed site, or any future green energy proposals, meets this declaration. How does an 80 year disruption of land, ranching, historical sites, Native	The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based the information specific to the project. The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands.

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		American religious sites, wildlife(both winged and furred) and the complete destruction of Magic Valley viewsheads comply with your mission statement?	
3812-1	Jan Hanks, Butch Hanks	I oppose the proposed Wind Turbine Project. I believe it violates your mission to “sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.” The negative impact of this project to Idaho is greater than the benefits. It will destroy the “use and enjoyment of present and future generations” part of your mission. This is a conflict with the Biden-Harris administration. You work for us not the Biden-Harris administration. Our local voice should be your priority. Please do not destroy Idaho with wind turbines.	See response to comment 3780-1 (see in Table A-3jj Legal or Policy Compliance).
3858-1	Stephanie Novacek	The BLM’s mission statement says to "sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations". How does a proposed wind site of 170,000+ acres, with a total area-affected timespan of 80 years accomplish this? The only honest, conscientous and appropriate choice is Alternative A.	See response to comment 3780-1 (see in Table A-3jj Legal or Policy Compliance).
5054-1	Sue Page	As outlined under Idaho Title 36 Fish and Game, Chapter 1, Sections 36 - 103 Universal citation: ID Code section 36-103 (2020) 36-103 WILDLIFE PROPERTY OF STATE - PRESERVATION States all wildlife within our state is declared property of Idaho. As government officials you should know this and rather than me lecturing you, I am simply asking you to uphold the laws of our state. Protect our state from outside forces from destroying our state for the benefit of others.	The BLM recognizes the State authorities and responsibilities for managing wildlife. The BLM regularly coordinate on broader policies and principles for ensuring the sustainability of wildlife and their habitats located on public lands. Additionally, the BLM has coordinated with the State of Idaho through our evaluation of the project to ensure that important issues and potential impacts are considered. With the information and expertise that the State of Idaho has provided, the BLM has prepared an EIS that will provide what is needed to take a hard look that considers potential impacts to wildlife and the State of Idaho’s interests in our decision on this project.
6882-2	Will (No Last Name Provided)	I am not convinced that this project can continue without violating the treaty rights of Shoshone-Bannock Tribes.	See EIS Appendix 10 (Agency and Public Involvement, Consultation and Coordination, Environmental Impact Statement Literature Cited, and Preparers), regarding the BLM’s government-to-government consultation with Native American Tribes, which considers treaty rights. Tribal Treaty Rights are further discussed in the Cultural Resources, Native American Resources EIS Section 3.5.1. The EIS notes that Tribal Treaty Rights span a variety of subjects, including rights reserved by Tribes in relation to natural resources (i.e., the right to hunt, fish, and gather on land ceded by or land retained by Tribes). Tribal Treaty Rights are considered in the agency decision-making process, consistent with the federal government’s trust responsibility to federally recognized Tribes.
6899-2	Japanese American Community	Impairment is not allowed under the National Park Service's Organic Act. It is the responsibility of the Secretary of the Interior to not allow impairment of NPS sites and resources. This project is in violation of the Organic Act. NPS Management Policies describe unacceptable impacts as "inconsistent with a park's purposes or values"; "diminish opportunities for current and future generations to enjoy, learn about, or be inspired by park resources and values;" and "unreasonably interfere with park programs, an appropriate use, or the atmosphere of peace and tranquility, or the national soundscape maintained in wilderness and natural, historic, and commemorative locations with the park" page 12. Management Policies states that "an impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is: necessary to fulfilling specific purposes identified in the establishing legislation or proclamation of the park, or key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified in the park's general management plan or other relevant NPS planning documents as being of significance" page 11. Management Policies goes on to describe what park resources and values are subject to the non-impairment standard. The resources and values for Minidoka that are subject to the non-impairment standard include: the park's scenery, scenic features, natural visibility, both daytime and at night, cultural landscapes, ethnographic resources, appropriate opportunities to experience enjoyment of the above resources, and "the park's role in contribute to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park's system." Furthermore, Management Policies states "Impairment may also result from sources or activities outside the park" page 11. The Lava Ridge Project surely meets the description of unacceptable impacts and impairment of Minidoka NHS. While NPS Management Policies do not apply to the BLM, the impairment of resources does apply to the Secretary of the Interior. There is no doubt about the impacts and that they constitute impairment and conflict with the Organic Act.	See responses to comments 12859-11 and 11598-26 (see both in Table A-3jj, Legal or Policy Compliance).
7346-1	Matt F.	This CFR section spells out liability for public lands permit grantees: https://www.ecfr.gov/current/title-43/subtitle-B/chapter-II/subchapter-B/part-2800/subpart-2807/section-2807.12 This says that grantees are liable for any damages caused to the United States or to third parties. This is a good start, but it should go farther. The applicant should be required to carry some type of bond or insurance, the funds of which are kept in an impound account for when the inevitable claims must be paid. This mechanism is already practiced, and is mentioned in the EIS with regard to "Reclamation bonds", which are money set aside for decommissioning. However, there are no mentions of such bonds for the operations phase of the project. BLM should require such for this project if any alternative other than A, no build, is chosen. With that in mind, another question that arises is: what is the process for people to report negative impacts, and how responsive should they expect BLM and the applicants to be? Will there be a 24-hour hotline they can call? Will it go to a live operator, or will they have to just leave a message and hope someone gets back to them in a timely manner? Is there a	The BLM’s regulations under 43 CFR 2805.20 allow the BLM to require a ROW grant holder provide a performance bond and reclamation bond prior to receiving a notice to proceed with construction and operation activates. The reclamation bond will be based on a reclamation cost estimated and the bond amount will be regularly re-evaluated throughout the term of the authorization.

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		requirement that they be responded to within a certain amount of time? There needs to be some type of complaint hotline/process for rectification of these negative impacts. Last, BLM should devise some type of process that is more akin to arbitration, rather than a court proceeding. The reason is that when individuals are eventually and inevitably harmed by these projects, they shouldn't have to spend a decade in court fighting a multi billion dollar global corporation just to be compensated for their loss. Rather, BLM should devise a simplified process which is focused on getting the payments out to injured parties as fast as possible. Should the payments rise faster than anticipated, or the damages continue to mount, BLM should reserve the right and the authority to shut down the project during the operations phase. Such a caveat could and should be included in the permit approval language. Without a mandated bond, a special contact hotline, and a mechanism for dispute resolution, residents and businesses in the area are likely to suffer severe loss of property and life without any established way for them to be compensated.	
8420-3	Sue Page	The mission of the BLM is to protect the land and its resources now and for future generations. It is not suppose to allow any sole source, use that will infringe on the land, environment or impact the enjoyment by all.	See response to comment 3780-1 (see in Table A-3jj Legal or Policy Compliance).
8699-1	Heidi Olson	Simple question, why is a private company allowed to start a business on public land? If so, I would like to start my next business on BLM ground as well. I am at least a citizen of idaho	The BLM considers uses on public lands that are consistent with laws, regulations, and policies. The uses proposed by MVE are consistent with allowable uses on public lands as provided for within 43 CFR 2800.
8788-2	Sue Page	The BLM has a duty first and foremost to protect public lands set aside, OUR LAND. To sustain the health, diversity and productivity of public lands for the people, the wildlife and the habitats for present and future generations. Lava Ridge Wind Project does not conform to any of the duties required by the BLM for the People's Land.	See response to comment 3780-1 (see in Table A-3jj Legal or Policy Compliance).
9001-1	Karen Schumacher	In the 2005 BLM Wind Energy Development Program <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwindeis.anl.gov%2Feis%2Findex.cfm&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Ccc059dc6765c400e76d708db3b990496%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169300617810839%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Tw9hybHYI3wlLLJvPOGVzZS9lmff%2FoyKD1osEdJ2ky8%3D&reserved=0> Record of Decision, there are protections for the cattle industry. On page A-2 it states, "wind energy projects shall be developed in a manner that will not prevent other land uses, including…livestock grazing, recreational use, and other ROW uses". It also states, "Additional areas of land may be excluded from wind energy development on the basis of findings of resource impacts that cannot be mitigated and/or conflict with existing and planned multiple-use activities or land use plans." Since the BLM has failed to initiate its responsibility for Coordination with local counties, and consistency with land use plans has not be determined, this project cannot move forward. The construction of the project conflicts with resource impacts for multiple use and grazing rights, as well as for up to 34 years, with reduction of allotments after that time. This violates the BLM's own policies.	In the EIS, the BLM provides a description of potential impacts to livestock grazing and will consider these potential impacts as a decision on the project is prepared. The county commissioners from Lincoln, Jerome, and Minidoka Counties have been coordinated with as a Cooperating Agency throughout preparation of the EIS. As a local agency with jurisdiction by law over adjacent private lands and memorandum of understanding was entered into outlining the counties' responsibilities for adjudicating the Proposed Action and alternatives with local planning and zoning ordinances. During reviews of the administrative draft EIS, the counties did not provide information regarding specific issues. See response to comment 11188-2 (see in Table A-3jj, Legal or Policy Compliance).
9001-2	Karen Schumacher	In addition, according to its Policies <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwindeis.anl.gov%2Fdocuments%2Fdocs%2FIM2009-043_att1.pdf&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7Ccc059dc6765c400e76d708db3b990496%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169300617810839%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=nIF0a7kkwr%2Bt09fwziCcdA7Fto6gPE%2FtqvMlspFvIFU%3D&reserved=0> and Best Management Practices (BMPS), BLM wind energy projects "shall be developed in a manner that will not prevent other land uses, including...livestock grazing, recreational use, and other ROW uses (1-1)." During construction the Grazing Plan calls for the removal of allotments and AUMs which violates these policies by preventing land use, along with recreational use, for years with eventual permanent loss of use.	See response to comment 9001-1 (see in Table A-3jj Legal or Policy Compliance).
9010-1	Karen Schumacher	It seems the BLM has not followed federal law for Coordination, specifically 43 USE 1712(c)(9) <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.law.cornell.edu%2Fuscode%2Ftext%2F43%2F1712&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0b66af63b7fc4fdbc71108db3b966dc4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169289500739389%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Dd690I3G%2FL3MsxtXEdkA%2FKHGNgNMDwZBe9Vq2n%2FbcUE%3D&reserved=0> . This law states, "(9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." The BLM is required to follow Coordination laws in the Lava Ridge project as it is required to by both FLPMA and NEPA rules. Coordination	The county commissioners from Lincoln, Jerome, and Minidoka Counties have been coordinated with as a Cooperating Agency throughout preparation of the EIS. As a local agency with jurisdiction by law over adjacent private lands and memorandum of understanding was entered into outlining the counties responsibilities for adjudicating the Proposed Action and alternatives with local planning and zoning ordinances. During reviews of the administrative draft EIS, the counties did not provide information regarding specific issues. The BLM recognizes the State of Idaho's interest and the potential uses of public lands. Early in the evaluation of the project the BLM coordinated with the State of Idaho agencies and incorporated them as cooperating agencies in the preparation of the EIS. The BLM has coordinated with State agencies extensively and used information pertaining to the State's jurisdiction by law and the agencies' expertise to prepare the EIS and provide a hard look.

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		<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Famericanstewards.us%2Fcoordination%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0b66af63b7fc4fdbc71108db3b966dc4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169289501050777%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=VnNatdrCA8LBXClqqd%2FM8he%2Bz%2BeBOy%2Br7OEnCYdfOqg%3D&reserved=0> is found in both of these laws, (42 U.S.C. 4331(b) <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.law.cornell.edu%2Fuscode%2Ftext%2F42%2F4331&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0b66af63b7fc4fdbc71108db3b966dc4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169289501050777%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=VQRHtFTTsXjP1pkXaTDF5tTr6NE7kIw1N1GvFOvUUAU%3D&reserved=0>), NEPA <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.law.cornell.edu%2Fuscode%2Ftext%2F42%2F4331&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0b66af63b7fc4fdbc71108db3b966dc4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169289501050777%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=VQRHtFTTsXjP1pkXaTDF5tTr6NE7kIw1N1GvFOvUUAU%3D&reserved=0> (42 U.S.C. 4331(b)), FLPMA <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.law.cornell.edu%2Fuscode%2Ftext%2F43%2F1712&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0b66af63b7fc4fdbc71108db3b966dc4%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638169289501050777%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=OctFvzjHCmyqFOfQMWt77ika1Zl5wAkbdpQCGv82aoE%3D&reserved=0> (43 U.S. Code § 1712(9)), and both state "shall" as mandates for Coordination. Until the BLM engages in Coordination and ensures consistency with local land use plans with ALL counties involved in this project, it cannot move forward and a No Action alternative must be the decision.	
9080-24	The Coalition to Protect America's National Parks	5. Multiple credible information sources indicate the wind resources in the Project area fall BELOW the U.S. Department of Energy (DOE) recommended threshold for wind energy development. However, the DEIS fails to adequately explain or analyze the "wind potential" rationale underlying the proposed siting of the Project – As background, the DOE Wind Energy Technologies Office states that "[a]reas with annual average wind speeds around 6.5 meters per second and greater at 80-m height are generally considered to have a resource suitable for wind development."35 However, the National Renewable Energy Laboratory (NREL) wind resource map for Idaho indicates that the average wind speed in the vicinity of the Lava Ridge project site just north of Twin Falls is less than the recommended 6.5 meters per second threshold. See map below. [map] As further evidence of the concern about the adequacy of wind energy potential at the site, see DEIS section 3.1.2.2 (p. 3-7) on "Tiering to the 2005 Programmatic Wind Environmental Impact Statement (PEIS)."36 As described, the 1986 Monument RMP for the SFO was NOT amended by the Record of Decision for the PEIS "for a variety reasons (BLM 2005b:B-2), including that developable wind resources were not deemed present in the area managed by the SFO at that time, or that BLM (1986) was expected to be amended in the near term (and thus analysis would be incorporated into BLM [1986])." (Emphasis added) In addition, a review of Appendix B, p. B-70, of the PEIS indicates the wind energy potential for the SFO is "Low." See the following map at PEIS Appendix B, p. B-70. [map] This begs the question – why is BLM entertaining a massive wind energy project at a location with "low" wind energy potential, so low, in fact, that the Monument RMP was NOT amended by the 2005 Wind Energy PEIS? When considering the current proposed Project area, to what extent did MVE or BLM consider the Project's obvious, significant, and unmitigable adverse effects on resources and values of Minidoka NHS, a unit of the National Park System before proceeding with Project planning at the proposed location? And why did BLM not suggest or discourage MVE from applying for this site because of the direct conflicts with the conservation of Minidoka's resources and values? Based on the POD information cited above, it sounds like BLM's primary feedback to MVE related to the avoidance of conflicts with sage grouse habitat. As a result, MVE was unaware or unconcerned about potential visual resource impacts in the vicinity of Minidoka. These questions/concerns have not been adequately addressed in the DEIS, which is sorely lacking in information or analysis regarding the rationale for siting the Project in a low wind energy potential area immediately adjacent to Minidoka NHS.	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. MVE completed sitting analysis and the latest computer modeling to assist in their selection of the project area as a viable wind energy facility. MVE has also established meteorological stations to gather additional information on the wind resources within the project area. MVE outlines their consideration for siting the project in the general area and earlier efforts to develop the project in other locations. This information can be in found in MVE (2023) and in Alternatives Considered by MVE (Appendix C in MVE [2023]). Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS to understand how the potential impacts relate to laws, regulations, and policies. See response to comment 11598-26 (see in Table A-3jj, Legal or Policy Compliance).
9080-25	The Coalition to Protect America's National Parks	6. The completion of SWIP Phase III (AKA SWIP-North) in Idaho and the LRWP appear be "connected actions" under NEPA; however, they are not identified or evaluated as such in the DEIS – We previously raised this concern in our scoping comments. Although the Record of Decision (ROD) for SWIP was issued in 1994, SWIP Phase III (AKA SWIP-North) has never been constructed. As proposed, SWIP-North would provide a 275-mile 500 kV transmission line between Midpoint Sub-station near Shoshone, Idaho and Robinson Summit in Nevada. Because the NEPA review for SWIP-North was conducted nearly 30 years ago, it is surely outdated as environmental conditions in the project area have changed significantly since 1994 (e.g., impacts of climate change; changes in sage grouse conservation). In December 2020, LS Power reported37 that SWIP-North is "permitted but seeking cost recovery" (i.e., construction funding) and that the "project is nearly construction ready and could be online as early as June 2024." The same report also indicated that SWIP-North would provide a link to "Idaho Power Company's interconnection queue; primarily wind, including a 1050 MW Lava Ridge wind project, being developed by [an] LS Power affiliate that is scheduled to be online in 2024." (Emphasis added.) Based on this statement, SWIP-North is clearly "connected" to the Lava Ridge Wind Project. The long delayed completion of SWIP-North, first approved in 1994 but never constructed, and the	See response to comment 11535-5 (see in Table A-3jj, Legal or Policy Compliance).

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		proposed LRWP are both planned for completion in 2024; both are being developed by LS Power or an "affiliate" of LS Power; and either project would be impractical without the other. In fact, the map below contained in LS Power's December 2020 report geographically illustrates the dependency of one project's existence upon the completion of the other, and vice versa. [map] Last but not least, the most recent (July 2021) U.S. Geological Survey (USGS) interactive "wind turbine database" map38 for Idaho shows there are no existing wind turbines in the immediate vicinity of the Twin Falls-Midpoint Substation-Shoshone area. Completing the Idaho leg of an interstate high voltage transmission line that terminates in rural Idaho nearly three decades after it was approved makes no sense unless and until there will be a major energy generation facility near the same terminus. As a result, SWIP-North and the LRWP clearly appear to be "connected actions" under NEPA. As described in BLM Permanent Instruction Memorandum (IM) No. 2018-023:39	
9080-26	The Coalition to Protect America's National Parks	Connected actions are those proposed Federal actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). (Emphasis added.) If the connected action is also a proposed BLM action, we recommend that you include both actions as aspects of a broader "proposal" (40 CFR 1508.23), analyzed in a single NEPA document. You may either construct an integrated purpose and need statement for both your proposed action and the connected action, or you may present separate purpose and need statements for your proposed action and the connected action. Regardless of the structure of the purpose and need statement(s), you must develop alternatives and mitigation measures for both actions (40 CFR 1508.25(b)), and analyze the direct, indirect, and cumulative effects of both actions (40 CFR 1508.25(c)). (Emphasis added) In other words, if either action "cannot or will not proceed without the other," then they are "connected" under NEPA and should be evaluated accordingly in the same NEPA document. As a result, we urge BLM to defer any further planning for the LRWP until BLM has prepared a supplemental EIS that properly analyzes both SWIP-North (Phase III) and Lava Ridge as "connected actions" under NEPA.	See response to comment 11535-5 (see in Table A-3jj, Legal or Policy Compliance).
9080-27	The Coalition to Protect America's National Parks	7. The DEIS does not consider the Area of Critical Environmental Concern (ACEC) nomination submitted for the 237,000-acre area surrounding the Minidoka WRC. Any decision on the Project should be deferred until after BLM makes a determination on the ACEC nomination – FLPMA requires BLM to "give priority to the designation and protection of areas of critical environmental concern," or ACECs, in the development and revision of land-use plans (43 U.S.C. § 1712(c)). The statute defines an Area of Critical Environmental Concern (ACEC) as follows: Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards [43 U.S.C. § 1702(a)]. (Emphasis added) Page 55 of the TCP study prepared by Algonquin Consultants, Inc. (see General Comment 2 above) states that: Algonquin also completed an ACEC Study report and nomination concurrent with this TCP Study that was submitted to the BLM, Twin Falls District Office. The ACEC nomination found that the BLM should establish the approximately 237,000-acre area surrounding the Minidoka Relocation Center as an Area of Critical Environmental Concern (ACEC). Minidoka and its vicinity represent a sensitive and culturally important site for the Minidoka descendant community. The landscape surrounding and incorporating Minidoka is also of significant national and historic importance, commemorating the experiences of incarcerated Japanese Americans during WWII. (Emphasis added) Given that FLPMA requires BLM to "give priority to the designation and protection of ACECs," it is incumbent upon BLM to fully evaluate the ACEC nomination before proceeding with further planning or approval of the ROW application for the Project.	The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based the information specific to the project. The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands. Additionally, the BLM has determined that the Proposed Action and range of reasonable alternatives needed to meet the purpose and need are in conformance with the *Monument Resource Management Plan* (BLM 1986), as amended. Therefore, the preparation of an analysis for the purpose of a nomination of an ACEC and land use plan amendment is outside the scope of the EIS. Within the EIS, the BLM considers the potential impacts to the resources that contribute to the resource values described in the ACEC nomination. However, the action to establish an ACEC will require evaluation on its own merits within a land use planning revision or amendment process. See response to comment 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
9080-28	The Coalition to Protect America's National Parks	8. The DEIS does not consider BLM's pending Idaho Renewable Energy Strategy (Strategy).40 Any decision about the LRWP should be deferred until after the Strategy is finalized, so that BLM can apply the Strategy's screening criteria to the Project before BLM makes a final decision whether to approve MVE's ROW application or not – BLM has recently announced that it is undertaking a review of its Renewable Energy Strategy (Strategy) in Idaho. Note: We submitted separate comments on the proposed Strategy and will not repeat them here. First, we commend BLM Idaho for reviewing its Strategy by taking a holistic look at its current approach to managing renewable energy projects. In our view, the current policy, if there is one, sorely lacks effective screening criteria for evaluating renewable energy proposals in Idaho. As an effective model for renewable energy project screening criteria, we call your attention to the 2012 Western Solar Plan (Plan).41 The Plan identifies "priority development zones" with high energy development potential and low potential for conflict with the protection of other resources and uses. It also identifies numerous "exclusion areas" where utility scale energy development would NOT be allowed in order to "to support the highest and best use of public lands by avoiding potential resource conflicts and reserving for other uses public lands that are not well suited for utility-scale solar energy development." Had a proper project screening process been in place in Idaho that identified priority wind energy development zones and exclusion areas, we suspect BLM would have denied or redirected the LRWP to another location when it was first proposed. This is due to the relatively low wind energy potential in the Project area and the relatively high potential for conflict of the Project with the protection of nearby historic and cultural sites. In the absence of an effective screening process, MVE, BLM, and many stakeholders have now invested considerable time, energy, and expense in a complicated and lengthy planning process. It is inevitable that whatever BLM decides to do with the Project after such a	The BLM Idaho renewable energy strategy as described in Instruction Memorandum IM-2023-09 outlines a pre-NEPA process that will help applicants, the BLM, and stakeholders have the information needed to effectively proceed with the NEPA process once the BLM proceeds with evaluating a project. The policy is not intended to replace the NEPA process for informing the BLM's decisions.

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		process, some party or parties will be extremely disappointed with the decision. BLM Idaho has stated that the summary document for the Idaho Renewable Energy Strategy will be available by May 1, 2023,42 which means BLM will complete the Strategy well before it issues a final EIS or Record of Decision (ROD) on the LRWP. Once the Strategy is completed, we recommend that BLM apply it to the Project to help inform its decision about whether to approve the Project or not.	
1022-3-29	The Coalition to Protect America's National Parks	9. The proposed action violates the letter and intent of P.L. 109-441, an Act to Provide for the Preservation of Japanese American Confinement Sites43 – The Act requires the Secretary to establish a program "for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring "historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation's commitment to equal justice under the law." (Emphasis added.) As described in the law, this is an "all of the above" mandate, not a discretionary or "one or none of the above" decision option for Interior agencies. The proposed action, a massive wind farm development with up to 400 wind turbines with a maximum height of up to 740 feet, will be highly visible, dominate the landscape, and overwhelm the scenic vistas immediately north and northeast of Minidoka National Historic Site (NHS). In addition, the proposed action would "overlap 4,818 acres (8 square miles) of Minidoka WRC." (DEIS p. 168) Moving forward with the proposed action, as described, would be the antithesis of the Act's mandate to right the injustice of Nikkei incarcerations and demonstrate the "Nation's commitment to equal justice under the law." Although portions of the DEIS acknowledge the history of Japanese American incarceration at Minidoka WRC, the fact remains that all proposed action alternatives would cause substantial adverse effects to the site. As a result, BLM's planning process continues to seem indifferent to the unjust treatment suffered by and the amazing resiliency demonstrated by the Nikkei community at Minidoka WRC44 during one of the gravest American civil rights injustices of the 20th century. Moving forward, consistent with P.L. 109- 441, BLM should carefully re-consider the historical and cultural context of the Minidoka landscape that BLM's proposed action would irreparably harm.	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service), 11598-26 (see in Table A-3jj. Legal or Policy Compliance), and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
9080-30	The Coalition to Protect America's National Parks	10. Notwithstanding FLPMA's "multiple use" mandate, the Secretary of the Interior has an "absolute duty" under the NPS Organic Act, as amended,45 to protect the resources and values of Minidoka NHS from unacceptable impacts – As the chief executive of the U.S. Department of the Interior, the Secretary is responsible for ensuring the Department and its bureaus comply with a variety of agency-specific legal mandates. For example, as stated in the DEIS (p. 1-1), FLPMA "requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V)." While FLPMA emphasizes managing public lands for multiple uses, at its core it is a conservation law. Section 102 (a)(8) of the Act states, in part: "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values[.] (Emphasis added.) In contrast to the BLM's "multiple use mandate" under FLPMA, the NPS-managed resources at Minidoka NHS are protected under the "conservation mandate" of the NPS Organic Act of 1916 and subsequent amendments. The Organic Act established the fundamental purpose of units of the National Park System, which is: to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (54 USC § 100101(a))	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service), 11598-26 (see in Table A-3jj, Legal or Policy Compliance), 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics), and 12859-11 (see in Table A-3jj, Legal or Policy Compliance).
9080-31	The Coalition to Protect America's National Parks	Congress supplemented and clarified the NPS Organic Act's 1916 provisions through enactment of the General Authorities Act in 1970, and again through enactment of a 1978 amendment commonly referred as the "Redwood amendment" because it was included in a bill expanding Redwood National Park. Key language from these amendments includes the following: Congress further reaffirms, declares, and directs that the promotion and regulation of the various areas of the National Park System… shall be consistent with and founded in the purpose established by section 1 of this title [the Organic Act provision quoted above], to the common benefit of all the people of the United States. The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress. (16 USC 1a-1) (Emphasis added) Congress intended the language of the Redwood Amendment to the General Authorities Act to reinforce the provisions of the Organic Act, not create a substantively different management standard. As stated in the Senate committee report:46 The Secretary is to afford the highest standard of protection and care to the natural resources within . . . the National Park System. No decision shall compromise these resource values except as Congress may have specifically provided. The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system. (Emphasis added) Similarly, the House committee report described the Redwood amendment as a "declaration by Congress" that the promotion and regulation of the National Park System are to be consistent with the Organic Act. The House report47 stated: The Secretary is to afford the highest duty of protection and care [to parklands]. (Emphasis added) In other words, while FLPMA Title V may "authorize the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric public lands," the Secretary of the Interior has overarching responsibility over all bureaus of the Department. The Secretary's responsibility includes "an absolute duty, which is not to be compromised,…to take whatever actions and seek	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service), 11598-26 (see in Table A-3jj, Legal or Policy Compliance), 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics), and 12859-11 (see in Table A-3jj, Legal or Policy Compliance).

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		whatever relief as will safeguard the units of the national park system," including Minidoka NHS. We urge Secretary Haaland to fulfill this absolute duty by denying MVE's problematic ROW grant application.	
9080-33	The Coalition to Protect America's National Parks	Section 1.4 Conformance with Land Use Plans (p. 1-2) – This section of the DEIS states the following: The Proposed Action and alternatives described in this EIS are in conformance with the [1986 Monument Resources Management Plan (RMP)], as amended, including the 2015 Idaho and Southern Montana Grater Sage-Grouse Approved Resource Management Plan Amendment (BLM 2015). (Emphasis added) The Proposed Action and alternatives fall within an area designated as "moderate use", which is described as follows: Moderate use areas are generally suitable for a wide range of existing and potential uses and will be managed for production and use of their forage, timber, minerals and energy, recreation, or other values. Where conflicts occur with resources or uses, full consideration of all benefits and costs will be taken into account in resolving such conflicts. Sensitive and significant values will always be protected consistent with Federal and State law. Public lands in a moderate use area will be retained in Federal ownership. (BLM 1986:4) (Emphasis added) No special limitations or restrictions on the type or intensity of resource use will be applied in this area. Valid uses will be allowed subject to environmental review and stipulations or special conditions to protect resources. (BLM 1986:6) (Emphasis added) We believe the BLM has mischaracterized the proposed LRWP as a "moderate use." An energy generation facility is defined as a "public utility" under applicable Idaho statutes; and a "public utility installation" is an "intensive use/development" that is explicitly precluded in the 1986 Monument RMP, see p. 4, which states: Intensive Use/Development Areas – These areas will generally be managed for a major or large- scale intensive use/development such as a major campground, off-road vehicle (ORV) area, mine, or public utility installation. No intensive use/development areas were established in the Monument RMP. (Emphasis added)	The BLM discusses conformance with the *Monument Resource Management Plan* (BLM 1986), as amended, in EIS Appendix 2. Also see response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance).
9080-34	The Coalition to Protect America's National Parks	First, under Title 61 of the Idaho Statutes, §61-11848, LRWP meets the definition of an "electric plant": The term "electric plant" when used in this act includes all real estate, fixtures and personal property owned, controlled, operated or managed in connection with or to facilitate the production, generation, transmission, delivery or furnishing of electricity for light, heat or power, and all conduits, ducts or other devices, materials, apparatus or property for containing, holding or carrying conductors used or to be used for the transmission of electricity for light, heat or power. (Emphasis added) Second, under § 61-12949 of the statute, LWRP meets the definition of a "public utility": The term "public utility"…includes every common carrier, pipeline corporation, gas corporation, electrical corporation, telephone corporation and water corporation … and each thereof is hereby declared to be a public utility and to be subject to the jurisdiction, control and regulation of the commission and to the provisions of this act. The term "public utility" as used in this act shall cover cases: (1) Where the service is performed and the commodity delivered directly to the public or some portion thereof, and where the service is performed or the commodity delivered to any corporation or corporations, or any person or persons, who in turn, either directly or indirectly or mediately or immediately, performs the services or delivers such commodity to or for the public or some portion thereof[.] (Emphasis added) In other words, LWRP, if approved, will be considered a "public utility" under applicable Idaho statutes; "public utility installations" are explicitly identified as an "intensive use/development" under the Monument RMP; and no "intensive use/development areas" were established in the RMP. Therefore the Project is not in conformance with the Monument RMP. We ask that BLM revise the DEIS to accurately reflect the nonconformance. In addition to the legal definitions described above, we also question in common sense terms how the BLM could view the LRWP as only a "moderate use" of the area. As described in the FR Notice, "[t]he Project area spans 197,474 acres and all project components would be sited within a series of corridors. These corridors are approximately one-half mile wide and cover approximately 84,385 acres." (Emphasis added) In mathematical terms, 84,385 acres or 43% of the Project area would be heavily developed with concentrated corridors of as many as 400 wind turbines up to 740 feet tall. While there may be "open space" between the numerous corridors, the visual adverse effects of such concentrated development over such a large area would resonate across the Project area and beyond. If one compares the size of the Project area with the size of the proposed ACEC described in General Comment 7 above, the Project area of 197,474 acres would constitute 83% of the proposed 237,000-acre ACEC. This hardly seems like "moderate use" to us.	See responses to comments 9080-33 (see in Table A-3jj Legal or Policy Compliance) and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
9080-41	The Coalition to Protect America's National Parks	A. Section 3.1.1 Existing and Future Trends and Actions – This comment is specifically about the SWIP-North project mentioned on DEIS p. 3-5. See General Comment 6 above. In December 2020, LS Power reported51 that SWIP-North, approved in 1994, is "permitted but seeking cost recovery" (i.e., construction funding) and that the "project is nearly construction ready and could be online as early as June 2024." The same report also indicated that SWIP North would provide a link to "Idaho Power Company's interconnection queue; primarily wind, including a 1050 MW Lava Ridge wind project, being developed by [an] LS Power affiliate that is scheduled to be online in 2024." (Emphasis added.) The 1994 NEPA compliance for SWIP-North is undoubtedly outdated, as environmental conditions in the project area have changed significantly over the past three decades (e.g., impacts of climate change; changes in sage grouse conservation, etc.). It is clear from LS Power's 2020 report that the primary reason the company is moving forward with that project now, with a target completion date of 2024, is because the LRWP is also anticipated to be completed by 2024. As a result, BLM should follow its guidance in Permanent Instruction Memorandum (IM) No. 2018- 023:52 Connected actions are those proposed Federal actions that are "closely related" and "should be discussed" in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they… cannot or will not proceed unless other actions are taken previously or simultaneously (40 CFR 1508.25 (a)(1))… If the connected action is also a proposed BLM action, we recommend that you include both actions as aspects of a broader	See response to comment 11535-5 (see in Table A-3jj, Legal or Policy Compliance).

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		"proposal" (40 CFR 1508.23), analyzed in a single NEPA document. (Emphasis added) We urge the BLM to defer any further planning on LRWP until it has prepared a supplemental EIS that properly evaluates the Lava Ridge Wind Project and SWIP-North as "connected actions," which they clearly are.	
9080-42	The Coalition to Protect America's National Parks	B. Section 3.1.2.2 Tiering to the 2005 Programmatic Wind Environmental Impact Statement (PEIS) (p. 3-7) – See General Comment 5 and Chapter 1, Section 1.7 comment above. As described previously, BLM did NOT amend/incorporate provisions of the 2005 PEIS into the Monument RMP due to the lack of wind energy potential in the SFO. Yet BLM proposes to "adopt" just the best management practices (BMPs) from the 2005 plan while disregarding the more recent BMPs for "Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands,"53 published in 2013. For example, the 2013 BMPs recommend: "Site [alternative energy] facilities and ROWs outside of sensitive viewsheds or as far as possible from sensitive viewing locations." (Emphasis added) However, the proposed action for the LRWP is located only 0.5 miles from the boundary of Minidoka NHS, which is the antithesis of "outside of sensitive viewsheds or as far as possible from sensitive viewing locations." In general, BLM has not explained its rationale for adopting just the BMPs from a plan/PEIS that it did not otherwise amend or incorporate into the Monument RMP, while disregarding more recent BMPs that are specifically related to reducing visual impacts of renewable energy facilities on BLM-administered land. We recommend that BLM adopt the 2013 BMPs instead.	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. Throughout the preparation of the EIS, the BLM has used the mitigation hierarchy to identify measures and alternatives that would avoid and minimize potential impacts. The development of measures and alternatives have been informed by the robust suite of outreach efforts that the BLM facilitated throughout the preparation of the EIS. The BLM provides opportunities for input early on through coordination with stakeholders and cooperating agencies and incorporated input from the public throughout the preparation of the EIS. These outreach efforts have resulted in considering elements that have the potential to minimize adverse impacts. Through completion of the BLM's evaluation of the project consistent with NEPA, a decision will be based on an analysis of the full range of potential impacts with consideration for the use of appropriate BMPs. See response to comment 11534-6 (see in Table A-3jj, Legal or Policy Compliance).
9080-49	The Coalition to Protect America's National Parks	4. APPENDIX 2. Potential Major Agency Authorities and Actions and Other Applicable Federal Laws, Regulations, and Policies – The appendix fails to include numerous significant federal statutes and guidelines that are directly applicable to the Project. The following authorities provide important context for this issue and should be included in the listing: [see comment letter for full list, too much to fit in one comment]	Table App2-1 lists the major relevant agency actions and authorities that must be obtained or considered for the project. Other federal, state, and local authorities that may require actions and authorities applicable to this EIS are listed after the table. The relevant actions and authorities provided in this appendix are not meant to be comprehensive.
9080-53	The Coalition to Protect America's National Parks	G. The Civil Liberties Act of 1988 (Public Law 100-383)66 – The Act granted limited reparations to Japanese Americans who had been incarcerated by the United States government during World War II. The limits of these reparations reinforce the importance of preserving Minidoka WRC and the remembrance of its history and the people connected to it. H. P.L. 109-441, An Act to Provide for the Preservation of Japanese American Confinement Sites67 – Section 1(a) of the Act provides that The Secretary shall create a program within the National Park Service to encourage, support, recognize, and work in partnership with citizens, Federal agencies, State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation's commitment to equal justice under the law. (Emphasis added.) In other words, it was the expressed intent of Congress that the Secretary of the Interior shall, among other things, identify, protect, and restore Japanese American confinement sites to "demonstrate the Nation's commitment to equal justice under the law." Implicit within this statement is Congress's recognition that the Nikkei were unjustly incarcerated at sites like Minidoka; and preservation of these sites by the Department of the Interior is necessary to demonstrate the Nation's commitment to righting that that injustice.	See responses to comments 9080-51 (see in Table A-3ii, Decision Process for National Park Service), 11598-26 (see in Table A-3jj, Legal or Policy Compliance), and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
9080-55	The Coalition to Protect America's National Parks	K. 43 CFR Part 280070 – Section 501 (a)(4) of FLPMA authorizes the Secretary of the Interior "to grant, issue, or renew rights-of-way . . . for generation, transmission, and distribution of electric energy." The Secretary has delegated that authority to the BLM; and the Bureau has promulgated regulations at 43 CFR Part 2800 governing the granting such rights-of-way. Section 2804.35 describes how BLM will prioritize solar and wind applications. Specifically, § 2804.35(c) states: (c) Low-priority applications may not be feasible to authorize. These applications may include lands that meet the following criteria: (1) Lands near or adjacent to lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which may be adversely affected by development (Emphasis added) In other words, under applicable BLM regulations, because of its location the LRWP is considered a "low-priority" project that "may not be feasible to authorize" in order to protect "sensitive viewsheds, resources and values" of a unit of the National Park System. BLM should follow its own regulations and deny MVE's ROW application.	This pre-NEPA processing step described in the regulations is intended to help applicants, the BLM, and stakeholders have the information needed to effectively proceed with the NEPA process once the BLM proceeds with evaluating a project. The policy is not intended to replace the NEPA process for informing the BLM's decisions.
F1-3		I respectfully request that BLM immediately suspend its review of the Lava Ridge project including the ongoing NEPA and Section 106 processes and commence a holistic public process to update the Monument Resource Management Plan, which has not been updated in more than 37 years. This will allow the BLM to examine the cultural, historic, and resource values of the public lands in and around the Minidoka National Historic Site in a holistic way, providing meaningful protection for cultural resources, scenery, wildlife, and recreation, when evaluating potential renewable energy projects.	Also see response to comment 11326-9 (see in Table A-3jj, Legal or Policy Compliance). The BLM's decision space is described in Section 1.3 (Decision to be Made) of the EIS. The decisions made by the BLM on the project or any subsequent renewable energy proposal are made after considering the relevant information and based on information specific to the project. The BLM's purpose and need for the project is specific to responding to MVE's application for a ROW grant to construct, operate, maintain, and decommission a wind energy facility on public lands. Additionally, the BLM has determined that the Proposed Action and range of reasonable alternatives needed to meet the purpose and need are in conformance with the *Monument Resource Management Plan* (BLM 1986), as amended. Therefore, the preparation of an EIS for a land use plan amendment or revision is outside the scope of the EIS. The blm analyzes a full range of reasonable alternatives and describes additional alternatives that were considered within the EIS. The description of the alternatives is in EIS Chapter 2 and the analysis of potential

Comment ID	Commenter	Public Comment	Response to Comment
			impacts is in Chapter 3. This analysis provides the BLM an opportunity to evaluate the project with the information needed to take a hard look prior to a making an informed decision.

Public and Stakeholder Involvement

Table A-3kk. Public and Stakeholder Involvement

Comment ID	Commenter	Public Comment	Response to Comment
10450-1	Eric Bush	What I would like to see is Fact based information so a thinking person can judge the pros and cons.	The EIS was prepared using best-available information and clarifies impacts analysis rationale throughout Chapter 3 (Affected Environment and Impacts) and within EIS Appendix 3 (Issues Analyzed in Brief).
10531-2	Steph Olmstead	I urge BLM to extend the comment period at least 30 more days to give all citizens a chance to review the very large document concerning the Lava Ridge wind project.	The BLM initially provided a 60-day review period for the draft EIS (January 20 to March 20 of 2023). In response to requests to extend the public comment period on the draft EIS, the BLM provided an additional 30 days, leaving the comment period open through April 20, 2023.
11297-3	Steven Upton, Linda Upton	Another group impacted will be the low income and minority groups. Materials for Lava Ridge Project have not been provided in alternative formats in order for these groups to make public comments. Has LS Power, aka Magic Valley Energy and the BLM purposely excluded non-English speaking communities? [] What about our farmers and ranchers? Please do not ignore our communities and work with us to address all concerns.	See response to comment 11629-1 (see in table A-3kk, Public and Stakeholder Involvement). The affected grazing permittees are in coordination with BLM and MVE; MVE developed the Grazing Coordination Plan (Appendix S in MVE [2023]) through coordination with the grazing permittees.
11372-1	Jamie Kohtz	62,000 AUM's and nearly 42 ranchers, my family included, will be impacted by the project. Factoring in their employees, hundreds of families will be impacted in some way due to the inaccessible AUM's. The employees that live and work on these local farms and ranches are primarily migrant and Spanish speaking. I do not feel that enough has been done to reach out to these people, gather their input, and educate them on the project.	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11436-2	Tim Ekeberg	In addition you have had Idaho's Senator's requesting additional time for the public to view and fully understand the EIR and ALL of the Alternative choices available to them. With this error it is clear either the BLM extend the comment period or face legal challenges for years to come costing tax payers millions to fight litigation that might be avoided by extending the comment period.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1145-1	Sue Williams	After attending the Lava Ridge meeting in Jerome and recognizing the level of detail contained in the draft EIS, I respectfully request that the deadline for comments be extended a minimum of 30 days. This extension would give more time to thoroughly understand the impacts noted in the document and provide time for the public to involve their own experts to analyze and provide substantive objections to this project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
11491-8	Dean Dimond, Jennie Bateman	Counties have not been given tangible impacts of this wind project. [...] This is an example of regulatory overreach of federal overreach as well as circumvents true public involvement. Counties have been disregarded in this deficient draft EIS.	As listed in EIS Appendix 10, Table App10-2, the three counties in which the project is located are participating in the project NEPA process as cooperating agencies. See also comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement) regarding the draft EIS public comment period extension.
11535-1	Steven Andersen	As a preliminary matter, we express our continued objection to the denial of our firm's previous requests for an extension to the public comment period beyond April 20, 2023. The DEIS describes a proposal for massive turbines never constructed or tested, without any specificity on siting, or engineering for the proposed project, with huge gaps in necessary analysis. The DEIS acknowledges a lack of engineering and site specifics but tries to brush it off as a positive that allows "flexibility". In reality, this is key information necessary for an informed analysis of environmental impacts. The agency should have allowed itself more time for an adequate DEIS based on necessary information and likewise, permitted the public adequate time to review and participate. Not only is this an extremely complicated topic with multi-faceted implications (many not addressed in the DEIS), but the impacted public – specifically, many impacted minority and low-income rural communities – remained, by and large, uninformed, and unable to meaningfully participate on this expedited track relative to the complexity of the project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement) and EIS Appendix 10 for all public involvement opportunities provided. Also, Section 3.6.1.1.1 (Low-Income, Minority, and Tribal Populations) and 3.6.1.2 (Impacts) of the EIS provide an evaluation of potential project impacts to low-Income and minority communities.
11551-2	Erin Shigaki	Regarding the March 2, 2023 Open House Event Because the BLM failed to notify impacted populations in Idaho and throughout the US (including Japanese Americans) before the Notice of Intent was posted on August 20, 2021, I was glad to see that there would be "open house" events in certain locations. During the "open house" event on Mercer Island, WA on March 2, 2023, I was present for the full four hour long event along with several other members of the Minidoka Pilgrimage Planning Committee. Please explain why the event was held at an inconvenient suburban location when there are several historic Japanese American locations in Seattle proper. Who did you reach out to to decide where this event should take place? Why was it held during the work week, and in the middle of rush hour traffic? Please explain why not one BLM employee introduced themselves to me, even as I interacted with our survivors and other community members, as well as reviewed your visuals. Please explain why the LS Power employees who were present were not wearing identification badges. I also ask for an explanation as to why LS Power employees were traveling with your group at all, and–as I understand it–staying at the same hotels and dining with BLM staff. Please explain why	In support of the BLM, NPS staff suggested the Portland and Seattle meeting times and locations. LS Power attended the meetings because they were open to the public. LS Power was not attending on behalf of BLM. No BLM staff dined with LS Power. BLM staff attempted to approach all members of the public attending the meetings. At public meetings, BLM staff visited with all members of the public who approached BLM staff for questions or clarifications. The No Action Alternative is evaluated in the EIS and is the background to all maps within the EIS. This was printed and included at meetings in response to public requests to do so.

Comment ID	Commenter	Public Comment	Response to Comment
		the Alternative A: No Action option was not printed on your many materials at the event, instead only on a hastily taped up piece of cardboard as an afterthought?	
11573-1	Jaimee Orton	However, my frustration with this project goes beyond its potential environmental impacts. I am also extremely frustrated by the difficulty of actually being able to submit public comment on this issue. As someone who cares deeply about our community and the environment, I want to have a say in this decision-making process. But the process for submitting public comment has been extremely confusing and frustrating, making it difficult for me and many others to participate. In order to submit public comment, I had to navigate a confusing online system. Even after I successfully submitted my comment, I received no confirmation or acknowledgment that my comment had been received. This lack of feedback left me feeling disengaged from the process and unsure if my voice had been heard. I am not alone in my frustration. Many of my friends and neighbors have also expressed difficulty in navigating the comment submission process. This lack of accessibility and transparency in the public comment process is deeply concerning and could result in the voices of concerned citizens like myself being ignored. I urge you to reconsider the process for submitting public comment on this issue. The community deserves a clear and accessible way to have their voices heard in this important decision-making process.	The BLM provided several open houses in late February (in Shoshone and Twin Falls, as well as a virtual online meeting) and early March (in Portland and Seattle) for submittal of in-person (or virtual) public comments, including comment transcription by a court reporter. Comments were also received via hardcopy mail to the SFO, via the project email address, and through online comment submissions on the project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/570). Also see response to comment 10531-2 (see in table A-3kk, Public and Stakeholder Involvement).
11618-2	Bif Brigman	Some of my most important questions relate to the cultural competency of Bureau of Land Management - staff, consultants and managers and their subsequent actions, decisions and priorities impacting the Minidoka National Historic site and Japanese American stakeholders. To date, everyone has appeared to be white. Everyone. The BLM track record on this EIS is a clear disaster on engaging the vast Japanese American community who have profound ties to Magic Valley. It really speaks volumes on the inability for BLM to successfully understand or engage this historically marginalized community with any depth. You are convinced you understand - but your actions and words tell me and others otherwise. I don't see how can you possibly think you understand and realistically or adequately can assess the impacts on these communities you don't belong to? And yet some continue to drive a process when you clearly do not understand the communities you are impacting, at all, nor the harm you are visiting on them. This proposal, at this location, is actively inflicting harm and you are only in the planning stage. It is shameful that you are visiting harm and trauma on a community that the Department of Interior originally harmed and traumatized in 1942. [...] Why won't you answer questions about what sorts of training Blm staffers have had when it comes to cultural competency? Why do you not require that from your consultants? Why can't you answer any questions about diversity equity and inclusion requirements for the Bureau of land management or policies that you are currently following as it relates to the subjects? Why is it not reflected in the EIS? [...] Why were no materials produced in Japanese language for non-English speakers who are associated with the Minidoka national historic landmark why were no ethnic newspapers, or other media engaged in the outreach efforts of BLM? Why was there no Spanish language translations of materials and notices? Spanish is the next most spoken language and NOTHING, Again massive failure of cultural competency and BLM. I also would like to know what formal process BLM has for addressing formal complaints against your biased EIS and especially the open house process and "outreach" - including signage, biased and selective posted options, location, timing and , the overly chummy relationship between the energy company proposing this project and your staff people? https://youtu.be/14MdgztuaP0	See EIS Appendix 10 for a list of Section 106 consulting parties involved in the Lava Ridge Wind Project NEPA process, including Japanese Americans and Tribes. Also see Tables A-1 and A-2 in this Public Comment Summary Report appendix. Also see response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement) regarding the translation of materials into Spanish.
11622-8	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	In addition to flaws in the DEIS, we wish to express our concerns about BLM's failure to follow DOI, BLM and Biden Administration policies regarding engaging with Environmental Justice Communities early in the planning process. While we appreciate BLM's outreach through Langdon Group/CADR program and the public meetings in Washington and Oregon, we felt that it was more of a "check the box" approach rather than a good-faith effort to engage with the Japanese American and Alaska Native community as required by Administration policies. This can be seen by BLM's disregard for some of the most important findings in the Lava Ridge Wind Project Stakeholder Assessment and Engagement Report that was produced by Langdon Group/Kearns & West for BLM in preparation for the DEIS process, such as the section that stated "appropriate meeting locations, dates and times should be coordinated with Local Japanese American community groups." In the Seattle area, a single public open house was held on Mercer Island to discuss the DEIS with the community. The location, date, and time were not discussed with local Japanese American community groups. The Langdon Group's report also found that increased "cultural competency training within BLM is warranted for meaningful engagement." Several members of the Minidoka Pilgrimage Planning Committee attended the open house and were greatly disappointed by the lack of meaningful engagement and cultural competency from BLM representatives. At various points during the open house, committee members were burdened with the responsibility of explaining concepts and history to BLM representatives that should have been known and taken into consideration from the beginning of the DEIS process. The committee also had to endure a BLM staff member calling images of children imprisoned in Minidoka "cute." We hope to see the lessons learned by BLM at the open house and in the Langdon Group's report reflected in the FEIS. We would welcome the opportunity to engage directly with the BLM and encourage it to work in meaningful ways with the Minidoka stakeholders located in Washington, Oregon, Alaska, California and throughout the United States, as well as Friends of Minidoka in Idaho to protect Minidoka's sacred values for current and future generations. The Lava Ridge project has clearly demonstrated that Minidoka has many lessons left to teach about avoiding repeating the wrongs of the past.	See responses to comments 11573-1 (see in Table A-3kk, Public and Stakeholder Involvement), 11551-2 (see in Table A-3kk, Public and Stakeholder Involvement), and 11618-2 (see in Table A-3kk, Public and Stakeholder Involvement).

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11629-1	Ruth Harder	-Why is it available in English only? There are many citizens that would be directly effected by the Lava Ridge project that cannot read or respond to the proposal.	The draft EIS handout and scoping notice were prepared in Spanish. A Spanish-translated draft EIS Executive Summary was provided to those that specifically requested Spanish translation. For information on how to obtain project information documents in accessible formats and/or translated into different languages, contact: Kasey Prestwich, Project Manager. By email: BLM_ID_LavaRidge@blm.gov. By mail: BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352. Additional information on the BLM Accessibility Program is always available at https://www.blm.gov/programs/recreation/recreation-programs/accessibility.
11741-1	S J Arima	Recently, I attended an informational gathering on Mercer Island, Washington sponsored by the BLM. Unfortunately it was not informative as a whole. Alternative A was not initially presented. By name it was added by onto the bottom of one of the boards featuring other alternatives in detail. The fact that there are other energy sites being proposed in Idaho was not featured. Seemingly they would have much less impact on the Minidoka Historical Site. There was no information that the possible energy produced by the Lava Ridge wind farm could very well be sold outside of Idaho. I was given the impression that attendees were being purposely guided by information and the lack of disclosures to favor Alternative E. A more complete factual presentation would have supported Alternative A.	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11772-7	Erin Shigaki, Stephen Kitajo; Minidoka Pilgrimage Planning Committee	The Langdon Group's report also found that increased "cultural competency training within BLM is warranted for meaningful engagement." Several members of the Minidoka Pilgrimage Planning Committee attended the open house and were greatly disappointed by the lack of meaningful engagement and cultural competency from BLM representatives. At various points during the open house, committee members were burdened with the responsibility of explaining concepts and history to BLM representatives that should have been known and taken into consideration from the beginning of the DEIS process. The committee also had to endure a BLM staff member calling images of children imprisoned in Minidoka "cute." We hope to see the lessons learned by BLM at the open house and in the Langdon Group's report reflected in the FEIS.	See response to comment 11618-2 (see in Table A-3kk, Public and Stakeholder Involvement).
11814-1	Jake Powell	I was extremely dismayed that the Alt A has never been presented at any of the scoping meetings I've attended. It seems like the decision is already made and the BLM is playing charades with the public and this scoping process.	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11842-1	Erin Nishijima	Additionally, you have failed to notify the impacted population in Idaho and throughout the US before the Notice of Intent was posted on August 20, 2021.	The NOI was the BLM's first public announcement of the agency's intent to prepare an EIS. The NOI initiates the NEPA scoping process which defines issues for analysis in the EIS and informs the BLM's alternatives development process.
11873-21	Mary Schwartz, Frank Schwartz	23. A large part of the demographic in the area of the Lava Ridge project is Spanish-speaking. The BLM's communications approach for this DEIS did not appear to consider this. The local population needs to be fully informed of this proposal, and it is BLM's responsibility to assure that happens.	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
11912-2	Da'nell Cannon	[...] have adequate town-hall informative meetings been held to inform and gain the consent of Idahoans?	See responses to comments 11573-1 (see in Table A-3kk, Public and Stakeholder Involvement) and 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
11926-9	Name Not Provided, Susan Jesser	BLM withheld information from the public at Open Houses in not sharing about Alternative A-no action. Can BLM be trusted to honestly consider the comments? Is a neutral party monitoring this process?	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement). Also multiple agencies and interested parties are participating in the NEPA process as cooperating agencies and providing on the analysis in the EIS, although the BLM is the land management agency and will make the final decision when selecting an alternative in the ROD.
1202-1	Dawn Leiske	I am requesting that you grant us an extension on Lava Ridge Comment Period from March 21, 2023; for at least another 60 days. We are not skilled researchers or writers for this project. We will need more time to put together our comments. The BLM and LS Power has taken 3 years to put the EIS research and document together. It is to our disadvantage that we have such a short period of time to read this whole document and comment on it.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement). The BLM proactively reached out to stakeholders (identified through: scoping, meetings with cooperating agencies, public expressions of interest, and Section 106 consultation) in the months prior to public release of the draft EIS to alert them of the upcoming review timeframe.
12101-1	Dawn Leiske	We are still waited for a hard copy of a Spanish version of the Lava Ridge Wind Turbines EIS, which was not provided by the end of the public comment deadline of April 20, 2023. "Limited English proficiency individual versions", of the Lava Ridge Wind Turbines EIS should have been provided by BLM at the beginning of the public comment period. There are NO "limited English proficiency individual's versions" of the Lava Ridge Wind Turbines EIS for the English limited individuals in Idaho. English language Zip files were given out, but that technology is no longer relevant in today's technical world. The majority of individuals wanting to comment did not own a tablet or a computer. They own cell phones. So receiving a hard copy of the EIS all (4) volumes was critical. We were told by the BLM that they had limited resources; and that they were too costly and difficult getting the EIS printed. I only received a hard copy of the English 4th volume after weeks of trying to get a hard copy from the BLM. Very few copies of the full 4 volumes of the English version where even distributed. That was because BLM felt they were "unnecessary", for us to review due to the nature of content within the 4th volume. I noted on the cover of the 4th volume; Section 508 of the Rehabilitation Act of 1973 was printed on it. (Not printed on volumes 1, 2, and 3 below). There is no mention of any languages, "such as Spanish or Japanese", for the individuals whom may be directly affected by this project. A federal government agency such as the BLM directly involved in the EIS process should provide full hard copies, in "all languages" for everyone wanting to make a formal public comment to the Lava Ridge Wind Turbines EIS? We were told to	See responses to comments 10531-2 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).

Comment ID	Commenter	Public Comment	Response to Comment
		write substantive comments with EIS references or it would not be considered as a public comment. Yet we were not able to obtain all necessary materials for all of the individuals wanting to make public comments. How are the limited English proficiency individuals going to write substantive comments without a these language appropriate EIS? The full English version of a hard copy was much too difficult to acquire.	
12305-1	Marcy (No Last Name Provided)	Why is the EIS only provided in English language? Reports are supposed to be available in the language common to the area. Spanish speaking residents of Jerome county make up 40% of the population. Native American tribes, Potuguese, and Japanese also make up a large potion of the population in the Magic Valley. And why are there not enough copies of the EIS for persons who are computer challenged and for those who do not have computers?	See responses to comments 11618-2 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12307-4	Dean Dimond	This is an example of regulatory overreach of federal overreach as well as circumvents true public involvement. Counties have been disregarded in this deficient draft EIS.	See responses to comments 10531-2 and 11491-8 (see in Table A-3kk, Public and Stakeholder Involvement).
12400-4	Elizabeth Lampert	I would respectfully request that the Public Comment Period be extended for at least another 6 months to allow more public comment.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
12402-1	Name Not Provided, Dawn Leiske	I understand that there is a Policy on adequate opportunity to provide input. These are the last couple of days until the deadline and this information should have been provided in the beginning of the comment period from what I read. I appreciate your time and effort on this matter but the issue has not been resolved for all people with limited English proficiency.	See responses to comments 10531-2 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12453-1	Alexia Deetz	I also, have some eyesight issues and find the time frame to respond to the enormous report extremely unrealistic. It is also of concern that there are no multi-lingual or audible copies of the Impact Statement and the only efficient access is online, using acrobat reader. How many people have resources, skills and abilities to access this way?	See responses to comments 10531-2, 11629-1, and 12555-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12555-1	Darrell and Jennifer Schutte	2. Why was the Lava Ridge EIS only available in English? This is not giving equal access to all. What about the 40% Hispanic population of Jerome County? What about people like our mother-in-law, who is legally blind? She has a right to know what is happening to her public lands, as well, and have the opportunity to have a say. What about those peoples who couldn't get a copy of the EIS because there were so few copies of the monstrosity of a document it was and could not access a digital copy?	See responses to comments 10531-2 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement). All documents provided via the project website (https://eplanning.blm.gov/eplanning-ui/project/2013782/570) were compliant with Section 508 accessibility requirements.
12556-1	Darrell and Jennifer Schutte	The Lava Ridge EIS and all materials distributed by LS Power / Magic Valley Energy and the BLM are 100% misleading. It is clearly evident that the only options offered to the public were Options B, C, D and E. What about Option A, which is to do nothing at all? Why is it missing from your charts? I believe that this was misleading to the public and it needs to be corrected. A new comment review period should take place with better explanation that the public does have, can have, and should have the option to pick or select Option A, for the BLM to do nothing and deny the project. We feel LS Power / Magic Valley Energy and the BLM failed to give full disclosure of ALL the facts and ALL possible options, including Option A. Again, the impact study should be redone so that the public understands that they infact had and have another option. All public meetings that used these misleading materials and charts will have to be repeated as well. I would ask that all who submitted comments on your web page or by other means and who commented on social media be notified as well, because it is proven that they have concern and deserve to be presented with all the options.	See responses to comments 10531-2 and 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12834-2	Sheree Bovey	The BLM has NOT mentioned to residents that there is an option A for this project. At no time have I seen and Option A presented in the maps. This would be the NO build option. This has been brought to the BLM's attention by several groups and they continue to not provide this.	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12846-1	Regina Smith	There have been requests for this document in Spanish. Hispanics, Basque, Portuguese and other minorities make up 40% of the population. They are not represented here. Requests for Spanish translations have been denied. It would not be unreasonable for MVE to foot the cost of a few copies for a large, local minority.	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12859-44	Kristen Brengel, Robyn Achilles; Friends of Minidoka	The Lava Ridge permit process began with little outreach to the Japanese American community. This directly contravenes the administration's Executive Orders and policies regarding stakeholder engagement while implementing its climate agenda. Climate Crisis Executive Order 14008. On January 27, 2021, President Biden issued Executive Order 14008, entitled "Tackling the Climate Crisis at Home and Abroad." The Climate Crisis E.O. states the goals of the Administration to reduce climate pollution and deliver environmental justice.271 The E.O. also states that: "[s]uccessfully meeting these challenges will require the Federal Government to pursue such a coordinated approach from planning to implementation, coupled with substantive engagement by stakeholders, including State, local, and Tribal governments." Secretarial Order 3399. To carry out this guidance from the President's Climate Crisis EO, Secretary Haaland issued Secretarial Order 3399, entitled a "Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process." Section 5 (c)of the Secretary's Order clearly requires BLM to engage with stakeholders early in the planning process, before a decision to prepare an environmental impact statement: "Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. 'Early in the project planning process' includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared." Emphases added.	See responses to comments 11618-2 (see in Table A-3kk, Public and Stakeholder Involvement) and 11842-1 (see in Table A-3kk, Public and Stakeholder Involvement).

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12867-3	Steve Lampert	There are many more issues that I believe the EIS does not adequately address for the Project. For this reason, I would respectfully request that the Public Comment Period be extended for at least another 6 months to allow more public comment.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
12949-1	Ralph Kincheloe; Connie Kincheloe	We attended the public meeting in Twin Falls on February 24 hosted by the Bureau of Land Management and the Galileo Project, LLC. The display boards did not include Option A, No Build. This is a violation of NEPA. While the DEIS does include this option, most of the public was interested in the boards and did not sit down to read the DEIS. How many of the attending public were unaware, based on the visual display boards, that this was still a viable option. It is questionable that they may have been driven to choose between other alternatives because of this decision to leave out a board. The zoom presentation on the following day also did not include Option A.	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12955-1	Jose Torres	I have concerns about the project that there is no information in Spanish and considering that almost 48% of the population in Jerome County are Spanish-speaking and we are homeowners. I was scared I asked more about the environmental impact statement in my area.	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12968-2	Charles Brockway	The public involvement allowed for this application has been absurdly inadequate given the massive scope and impact of the proposed project. Public meetings have been highly constrained and limited in scope, allowing only token public comment. Input from local governing bodies such as county commissions and city councils has been insignificant. The two virtual public scoping meetings were poorly executed, and did not allow for adequate and meaningful public comment.	See responses to comments 10531-2, 11491-8, and 11573-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12972-1	Sheila West	The Environmental Impact Statement for the Lava Ridge Wind Project does not comply with Executive Orders EO12898 and EO13166 which requires federal agencies to provide meaningful access for people with limited English proficiency. The above document is only available in English and not all languages of people effected by the scope of the project. The BLM is ignoring the Law and the people the law protects. The Lava Ridge Wind Project needs to be available in Spanish, Portuguese, Basque and Hindi to name a few of the languages spoken in the Magic Valley.	See responses to comments 10531-2 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12978-1	Susan Jesser	4. Jerome County has large LEP (limited English proficiency population and the draft EIS was not translated into Spanish. A Hispanic friend told me the Jerome is nicknamed "Little Mexico." This concern should be investigated by the Federal Coordination and Compliance Section of LEP.gov	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12978-2	Susan Jesser	8. BLM withheld information from the public at Open Houses in not sharing about Alternative A-no action. How can BLM be trusted to honestly consider the comments? Is a neutral party monitoring this process?	See responses to comments 1022-3 (see in Table A-3ee, Alternatives) and 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12979-1	Susan Jesser	In August 2022, I was first introduced to the Lava Ridge Wind Project and the negative impact on the economy, wildlife, habitat, aquifer, etc. When I attended the open house in Shoshone, listened to ZOOM meetings, and started asking questions, my eyes were opened to new concerns and more questions about Lava Ridge Wind Project I would appreciate some understanding as to why Alternative A-no change was not placed on the display posters? I asked a presenter, "What is/Where is "A" at the Shoshone Open House? When I heard that "A" is no change and "mysteriously" missing from the posters, I was very disappointed and angry. r Was there hot ONE person from SWCA, Galileo Project, MVE, or BLM, etc. who recommend showing the truth and that there was an Alternative A? The posters had Alternatives B C D E listed with C and E labeled (preferred) but no "A". Was showing "A" on the posters even discussed at all of the meetings? Who made the final decision that Alternative A-No Change shouldn't be presented to the public? Keeping the citizens in the dark about "A" appears to be a lack of honesty and that no change was an option for the area. At the open house in Twin Falls there was a paper showing Alternative A on the table with the printed DEIS volumes but not in Shoshone. Not letting folks know "no change" was an option from the start was not honest or being government employees or consultants with integrity. Another aspect of not listing Alternative A for Lava Ridge and "hiding" information concerns a sweet friend. She lives in the Clover area where Salmon Falls Wind project is being considered. She was telling me about a wind monitoring station not far from her home. She thought the coming wind turbines were a done deal when we talked. More keeping information from the public and not being told about NO CHANGE OPTION.	See response to comment 9275-1 (see in Table A-3kk, Public and Stakeholder Involvement).
12982-1	Jerry Taylor	The cumbersome format of the DEIS, the inordinate volume of the document, and the inherent difficulty in navigating electronic/online versions seriously detracts from the publics' ability to gain access to, focus on, or clearly understand what is being proposed or the impacts that would likely result. Pitiful few paper copies of the DEIS were made available for public review.	See response to comment 12555-1 (see in Table A-3kk, Public and Stakeholder Involvement).
13002-1	Jim Meeks	There are zero copies of the Lava Ridge wind project draft environmental impact statement printed in Spanish or any other language other than English. Idaho, proudly supports our significant percentage of Hispanic businesses and ag. land owners. Our Hispanic neighbors observe the opportunity to review the draft impacts in Spanish.	See response to comment 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).
1377-1	Teiko Saito	I am writing to request that the Bureau of Land Management give the public an additional 30 days to comment on the DEIS for the proposed Lava Ridge wind project. The DEIS is very long, has multiple volumes and reading through it is a massive task for a personally	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).

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		affected citizen like myself. The likely impacts of the project are so sweeping and significant that it is taking me a long time to read through the DEIS, let alone draft my comments to send to you on this proposal. I don't believe that a 30 day comment period extension request is unreasonable, especially from the point of view of an elderly survivor from Minidoka. For that reason, I would deeply appreciate it if you and BLM would grant my request for a 30 day extension in the DEIS comment period for Lava Ridge	
1378-2	Brian Olmstead	One more small request: I am working hard every day to read, understand, and make respectful, thoughtful comments to each environmental issue in the DEIS. I cannot possibly finish this important process by March 21. This is a huge, unprecedented, project and this DEIS took a great many months to produce. Give myself and all citizens a fair chance to comment by extending the period by AT LEAST 30 additional days!	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1452-1	Bridget Keaveney	The Japanese American Citizens League, the nation's oldest and largest Asian American civil rights membership organization and representing over 8,000 members nationally, requests a 30 day extension to the comment period for the BLM's Draft Environmental Impact Statement from the currently scheduled March 21st, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1490-1	Sam Kito Jr	The DEIS is over 500 pages long and includes numerous attachments and supporting documents. Also, the BLM has not provided the public with hard copies of this document, making it more difficult for Minidoka survivors – all quite elderly Americans - to review. Because of the complexity of the project, additional time is needed to review and comment on the project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1578-1	The Coalition to Protect America's National Parks	I am writing to you on behalf of the Coalition to Protect America's National Parks (Coalition). Our membership is comprised of over 2,300 National Park Service (NPS) retirees, former and current employees, and NPS volunteers, who collectively represent more than 45,000 years of national park management and stewardship experience. We request that the Bureau of Land Management extend the public comment period for the Lava Ridge Wind Project by 30 days. This would give the public a total of 90 days to review and comment on the Draft Environmental Impact Statement (DEIS), a document that is well over 1,500 pages long including attachments.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1592-1	Stephanie Olmstead	I urge BLM to extend the comment period at least 30 more days to give all citizens a chance to review the very large document concerning the Lava Ridge wind project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1593-1	Eila Olmstead	I urge the BLM to extend the comment period so that my generation has a chance to educate ourselves on this project (right now I can tell you that many of my generation aren't even aware) and let our opinions be known for the preservation of Idaho public lands for generations to come.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1618-5	Brian Olmstead	I respectfully ask you again to extend the comment period, as studying and making important, knowledgeable comments takes a lot of time! 60 days is not a reasonable comment period for a gigantic project such as this!	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1691-2	Regina Smith	BLM extended the release date at least 3 times. To expect normal citizens to be able to study the DEIS and make effective comments in 60 days is unrealistic. Community members may have an the issue of even finding a professional to consult in 60 days. If we found a professional in this time period, and schedule an appointment, it could take 2 to 3 months to get in to see the professional. This 60 days comment(s) time limit is setting your community members up for failure. Please extend the comment period. I look forward to the news of the extension being released shortly.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1693-1	Brian Olmstead	First of all, I must ask for an extension of at least 30 days to the comment period for the draft EIS. I am reading it section by section and will be making comments on a great many of the draft findings. I want them to be personal, accurate, and pertinent to the subjects in the EIS. This will take research and there simply isn't time in the next 50 days to do all I need to do.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
1953-3	Allan Lloyd	Why not put this up for a vote for all of us to decide, instead of trying to ram it through with very little chance of all of Idaho having a voice?	See responses to comments 1022-3 (see in Table A-3ee, Alternatives) and 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2100-2	Office of Governor Brad Little, Office of Lieutenant Governor Scott Bedke, Office of US Senator Mike Crapo, Office of US Senator Jim Risch, Office of Congressman Mike Simpson	Our offices were informed that public outreach efforts have been insufficient to adequately engage Idaho citizens in the process. For these reasons we urge the BLM to reassess and refocus the process on working with the local communities to address the concerns outlined above. If all these concerns are not addressed, it is unlikely we will be able to support this project moving forward. Without community support, the BLM risks jeopardizing trust in government, which in turn makes future projects more challenging to accomplish.	See responses to comments 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement) and 11491-8 (see in Table A-3kk, Public and Stakeholder Involvement).
2193-1	Simone Griffin; BlueRibbon Coalition	As our members and others have continued to engage we believe an extension is warranted. There has been a high volume of interest in this project that should be accommodated. Because there has been such a high interest in public review of information we believe BLM should grant an extension to give adequate time for public comment. The comment period is imperative for the BLM to make these decisions, and if the public hasn't been given adequate time to review all information it compromises the integrity of the NEPA process. BRC would like to point out that the largest current wind farm in Idaho is more than ¼ the size of the proposed	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).

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		project. Therefore, a project of this size is new territory for residents and public land users. We hope BLM will strongly consider our recommendation to extend the comment period for another 30 days. This will provide adequate time for public comments to be made on accurate information. BRC would like to be considered an interested public for this project.	
2327-1	Toni McNeill	I am writing to request a 6 month extension to the public input on the EIS report. The report is extensive and time is needed for the public to address their concerns in the manner the BLM is requesting.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2336-1	Saundra Bell	It took 6 months for you all to come up with the EIS report you need to extend the time for us as citizens to respond with our input. Thank you for your consideration.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2364-1	Joe Alexander	I was writing in hopes that you could extend the time I have to respond to the lava ridge EIS it will take a long time to read.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2380-1	Doreen Alexander	I am writing to ask for an extension on the Lava Ridge comment due date. Because the letters are needing to be Substantive, they will take longer. Please consider extending this due date.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2554-1	Barbara Takei; Tule Lake Committee	As a grassroots non-profit organization composed of Japanese American survivors and descendants of the WWII incarceration, the Tule Lake Committee urges the BLM to grant an extension on the current March 21, 2023 deadline for public comment on the Lava Ridge draft EIS. Protection of archeological, historic, cultural and environmental resources is a complex conversation. The present 30-day comment period for the Lava Ridge draft EIS is not reasonable if the purpose of the comment period is to provide for a democratic process that includes, rather than discourages citizen participation. The present 30-day comment period for a 500-page technical and specialized report ensures the only participants in the process will be environmental professionals representing business and government, effectively excluding members of the general public. We urge the BLM to please consider extending the deadline another 30 days, or if possible, another 60-days. Such an extension would enable greater citizen participation on a matter of deep concern.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2821-1	Erin Shigaki	The Minidoka Pilgrimage Planning Committee (MPPC) is a volunteer-run 501(c)3 organization based in Seattle, WA. Our mission is to honor those who were incarcerated during World War II and educate the general public on this history. We organize an annual pilgrimage to the Minidoka National Historic Site in southern Idaho, where Japanese Americans from Seattle, Portland and Alaska were incarcerated. We serve incarceration survivors, descendants, and allies who care about this history. It follows that our community has a huge interest and stake in the forthcoming decisions to be made around the Lava Ridge Project. On behalf of the executive board of the Minidoka Pilgrimage Planning Committee, I write to urgently request a thirty day extension of the public comment period for the Lava Ridge Draft Environmental Impact Statement. This extension will provide the public with a 90 day comment period which provides a more fair and equitable period of time in which to digest and process the 578 pages of the DEIS.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2836-1	Brenda Ford	I would like the comments from the public to be extended 30 to 60 days.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2839-1	Susan Jesser	More time for this public comment is necessary to address this project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2841-1	Lowell Ihler	We respectfully request a 60-90 day extension of the comment period for the draft EIS report regarding the Lave Ridge Wind Farm. This is a huge project that will impact our state and valley for upwards of 100 plus years or more. The existing time frame for comments is not enough for the average citizen to study the DEIS and make informed decisions and educated comments. The LS Power has had a long time to put this all together, so a little longer for citizens to comment only seems fair. Many citizens are just now gaining access or even hearing about the project and all it entails, and because of the size of the draft EIS and the time involved to read it we ask you to, please, extend the comment period another 69-90 days.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2843-1	Lois Chapman	I want the comment period to be extended for 90 days so everyone has an opportunity to express their concerns.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2886-1	Diane Meeks	Please extend the community response time an additional 30 days, to April 30, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2887-1	Jose Martinez	Please extend the community response time another 30 days; to April 30, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2888-1	John Shaw	Please extend the community response to an additional 30 days; to April 30, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2889-1	Jim Meeks	Please allow for an additional 30 days for community response time...to April 30, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2890-1	Juan Martinez	Please allow another 30 days for community response time.. April 30, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2899-1	Matt Feemster	I am requesting a 60-day extension of the comment period for the draft EIS. The document is very long with substantial research for numerous environmental topics required by the [indecipherable]. An additional sixty (60) days would allow voters appropriate time to research all topics covered as well as read all appendices.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2900-1	Eric Hess	I am requesting an extension of time for review and comments on the Lava Ridge EIS due to complexity of the project for a period of 60-90 days.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).

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2902-1	Margerete Frigoyen	I am writing this note to ask you to give an extension of another 60 days so I can study the EIS/ There is a lot to read	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2904-1	Toni McNeill	I am writing to request an extension letter for responding to the environmental impact report. Extra time was given to produce the report & the report is very cumbersome. Responding in the manner you are requesting will take time, much more time for the lay person who does not work with these documents on a stable basis. I am requesting an extra 6 months for response letters.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2906-1	Heather Stroup	I would like to respectfully request an extension per the deadline for comments concerning the Lava Ridge wind project. Please allow an additional 30-60 days for members of our community to do their own research, and formulate responses to their findings.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2908-1	Gary Dixon	Please extend the comment period on the Lava Ridge wind turbine project. I am just becoming aware of this project and need more time to become informed. At least extend by 60 days.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2910-1	Alexia Decte	This letter is to request a 60-90 day extension on the March 21, 2023 comment period for the Lava Ridge wind project. Due to the extensive report there is to review and the public comment [indecipherable]. I need more time to prepare and submit my statement.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2913-1	Liz Niccum	I respectively request an extension for the March 21, 2023 deadline to submit written comments concerning the Lava Ridge draft EIS. This is an important concern for all citizens living in the magic valley and adequate time is needed to allow for there citizens to provide their written concerns about the impact of the Lava Ridge wind project will have on their lives and property.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2920-2	Regina Smith	The first one is simple I am requesting an extension to the comment period.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2921-1	Sheila West	Therefore, I respectfully request a 30 to 60 day extension on the Lava Ridge Project EIS comment period.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2924-1	Steven Andersen	In our firm's initial analysis of the DEIS, it is clear that the complexity of subjects addressed (and those omitted) paired with the gravity of the Proposed Action and Alternatives require an extended public comment period.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2935-1	Rob Norris	request that the BLM extend the comment period for a minimum 30 days, and 60 more days would be more reasonable.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2936-1	Kim Brackett, Chet Brackett	Due to the volume of the EIS and our age related inability to adequately maneuver the document on the computer, we need more time to be able to: 1. Secure a written copy of the EIS and 2. Review and study the document. The invasive and potentially irrevocable damage to sensitive environment - we feel that a comprehensive study time for this is very necessary- so we are respectfully asking for an adequate extension of time to review the EIS. At least 6 months.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
2943-1	Vern Eames	Please extend the comment period so that credible analysis and research can be included in public comments.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3052-1	Marsha Jones	Please extend the public comment period by at least 30 days so we have time to review the thousands of pages of the Lava Ridge disaster project for Idaho.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3054-1	Philip Gossi; Gooding-Lincoln County Farm Bureau	I would like to have the deadline for submitting comments on the Lava Ridge Wind Projected extended 30 to 60 days	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3055-1	Karen Matsumoto	Due to the length and complexity of the draft EIS, and the difficulty of interested parties to fully understand the process and provide meaningful comments in such a short time, the public comment period should be extended by 30 days to April 21, 20223.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3056-1	Scott Prow	I am requesting that you consider extending the public's comment period.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3163-2	Rick Aitchison	Bring about Structured Questions that all Parties involved can agree to. Questions that must be generated by communities and must be answered	See Section 1.4 of the document for the preliminary issues identified through public scoping and stakeholder involvement and the questions that were analyzed in brief (EIS Appendix 3) and analyzed in detail (Chapter 3).
3163-3	Rick Aitchison	let communities Vote Yeah or Neah for this Project.	See response to comment 1022-3 (see in Table A-3ee, Alternatives).
3262-2	Dawn Leiske	I am requesting that you grant us an extension on Lava Ridge Comment Period from March 21, 2023; for at least another 60 days. We are not skilled researchers or writers for this project. We will need more time to put together our comments. The BLM and LS Power has taken 3 years to put the EIS research and document together. It is to our disadvantage that we have such a short period of time to read this whole document and comment on it.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3701-1	Tony Cuciti	As a concerned resident of southern Idaho, I am writing to request that the Bureau of Land Management (BLM) extends the Lava Ridge Wind Project EIS public comment period. According to a Federal Register notice, dated 20 August, 2021, preparation of this EIS began, in earnest, with the January, 2021 Executive Order 14008. From that date, multiple full-time, fully-funded staffs, consisting of dedicated legal and other subject matter experts, required approximately two years, including delays, to prepare the EIS draft. Given that	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).

Comment ID	Commenter	Public Comment	Response to Comment
		most members of the affected public, including myself, possesses neither resident subject matter expertise, ability to devote full-time effort, nor funding to obtain commensurate legal guidance, a 60-day public comment period does not afford concerned citizens a reasonable or equal opportunity to research and prepare substantive input to such a complex and lengthy document. Accordingly, I request you extend or encourage the extension of the public commenting period by a minimum of 180 days, allowing people to submit feedback that will not only enable decision makers to select the best course of action but will also foster public confidence in the decision making process itself. In the spirit of a government of the people, by the people, and for the people, the system and processes by which the BLM decides Lava Ridge Wind Project may prove to be even more important than the decision itself over the long-term. To remain credible, the government needs to work, to the maximum practical extent, for all stakeholders. This project may significantly affect the livelihoods, and quality of life, of families who have lived in southern Idaho for generations and will continue to do so indefinitely. We, as southern Idahoans, need to know that we receive the same consideration and voice as the individuals and entities who stand to gain from this project in the short-term yet have neither a long-term stake in this area nor will be subject to long-term accountability. At a time when public confidence in government could be higher, extending the comment period as requested, would be a crucial first step by which the BLM can demonstrate its commitment to a fair and objective decision making process, consistent with its mission to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. Please feel free to contact me if you have any questions.	
3775-1	Nolan Nefzger	I´m from Sawtooth Elementary in the fourth grade. I was wondering if you and the BLM could give us a thirty day extension to read the EIS statement. I think it's only fair that you give us a thirty day extension. Thank you. 😃	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
3782-1	Dawn Leiske	RE: Comment on the Lava Ridge Wind Turbine EIS Draft My comments regarding the proposed Lava Ridge Wind Turbine Project are presented in this letter. The whole process to access the Lava Ridge Wind Turbine EIS Draft is so difficult for community members trying to write a comment. Censorship is the first thing that comes to mind when I think of how the comment EIS materials have been provided to us. Most people do not have computers. Phones limit the ability to read the documents, and the zip drives are useless for the only-phone-users. The on-line files are so overwhelming for a non-specialist. We have asked for hard copies so that people can read them and learn about the environmental studies in order to make our comments. We have been told it is too expensive to provide these to the general public. We have received a few zip drives that are being shared among hundreds of interested individuals. We are not specialists in this field, yet we are treated as if we are specialists; that should know how to go through these technical writings on a zip drive or through the confusing on-line documents. This is a very time consuming and overwhelming task; searching for topics and pages to reference our concerns? We received a 30 day extension which is very unfair due to the fact that this EIS draft took years to be perfected. This is difficult, to such a degree that many people will not respond. We are an extreme disadvantage to LS Power, and Magic Valley Energy. Magic Valley Energy has a website with an automated form that frequently regenerates a support letter for individuals to submit directly to BLM. http://www.supportlavaridge.com/http:/www.supportlavaridge.com/ <https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.supportlavaridge.com%2Fhttp%3A%2Fwww.supportlavaridge.com%2F&data=05%7C01%7CBLM_ID_LavaRidge%40blm.gov%7C0aa9f9dc153b4d0f7e6a08db1b277f85%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C638133628675667074%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=qz2sOXrjFFa09aBlNp66Ay3CVMRtSlJUpvR8YYzVYQg%3D&reserved=0> I have made multiple calls and trips to BLM for zip drives and a hardcopy. But I have been told I can read the copies in the BLM office or check them out for a few hours. The BLM office has told us they have one or two hardcopies. I called to get a hardcopy and only received just 3 volumes after several weeks of asking for one. We were told they didn't give us the 4th volume because no one asks for it. All of this is time consuming, discouraging, and very difficult to accomplish. The EIS is a valuable reference, which we should have easy access to. This is a huge project that will greatly affect our lives and we have had the most difficult time obtaining the material to help us in the process. The Lava Ridge Wind Turbine EIS Draft comment period has proven to be discriminatory and appears to be a great way to shut us down or censor us with our concerns and comments. The PDF for Spanish speaking people doesn't even work. This has left us, the community members, at a great disadvantage. We are about to see a huge energy industrial project that will leave the door wide open for future projects of Wind Turbines and Solar Energy that is slated for Idaho that we can do little about as community members. We understand that the energy from this project is slated for consumers outside of the state of Idaho. I encourage you to select Alternative A – No Action, in which the BLM would not authorize construction, operation and maintenance, and decommissioning of the project. We are not equally supported in regard to being provided with the necessary documents to make our concerns and comments known on the Lava Ridge Wind Turbine EIS Draft project. Volume One, LAVA RIDGE WIND PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT Page: 3,4,5, 6 Reference: United States Department of the Interior BUREAU OF LAND MANAGEMENT - Enclosed for your review and comment is the draft environmental impact statement (EIS) for the Lava Ridge Wind Project (project). In Conclusion: The "No Action Alternative" should be the only choice for this project.	See responses to comments 10531-2, 11629-1, and 12555-1 (see in Table A-3kk, Public and Stakeholder Involvement).
4055-4	Dawn Leiske	Concerning Lava Ridge Wind Turbine Project: The communities involved do not trust the this NEPA process. Our Facebook page has Magic Valley Energy infiltrating it with their Support Lava Ridge offsite link. The Magic Valley Energy has a webpage that guides them to fill out pre set form letters that Support Lava Ridge is	See response to comment 11573-1 (see in Table A-3kk, Public and Stakeholder Involvement).

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		causing more mistrust. I myself am having spammers respond to my posts and other posts for Stop Lava Ridge members on FB with offsite webpage links. This increases our mistrust of this system and MVE. Having a person labeled Court Reporter is also intimidating by those who don't communicate well and are intimidated with this NEPA process and our Legal System.	
4109-1	Kiersten Vander Pol	I'm one of the students from sawtooth Elementary 4th grade you talked to us about the project.Me and my class are requesting that we have a extension to the time for the statement to be read so we can have a bit more time to do research and finalize our class assignment.I hope you consider my class's and the public's offer on for the time adjustment for the research of the E.I.S statement we would like just a small adjustment of a month .Thank you very much for reading the suggestion that me and my class and the public's suggestion. I hope once again you will consider our suggestion. Thank you.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4184-1	Hylee Bautista	Dear Kasey Presrwich, Hi I'm Hylee ,I'm in fourth grade at Sawtooth Elementary school. You came to talk to us about the Lava Ridge Wind Project. I would like a 30 day extension to read the EIS statement because it is about 527 pages.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4209-1	Olivia Jones	I'm in fourth grade at Sawtooth Elementary School. You came to talk us about the Lava Ridge project. I would like a 30 day extension for the Idaho people to read the EIS statement because it is about 527 pages. 🙏	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4215-1	Courtney Stevens	You visited our school, and I am requesting a 30 day extension for extra research. We need more time to read the EIS Statement, and more time to spread the word. Thank you.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4261-1	Lucas Dahle	Please give us more time to submit what we think. Maybe 'till sometime around May or June? -Luke D.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4266-1	Addison Bagley	I am in the class you presented to. My name is Addison. My class and I are hoping for some more time to look over the EIS statement. We are looking for about a 30 day extension.I hope you consider this.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4338-1	Logan Hawkins	This is about the Lava Ridge Wind project. I am asking for an extension for 30 days to read the EIS book. It has 527 pages.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4390-1	Lucas Dahle	Please give us more time to submit our answer or whatever it is. Maybe it could be due sometime around May or June? Thanks!	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4396-1	Dawson Peck	Please give us a 30 day extension, past March 21st, to read the EIS statement if you can.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4398-1	Tyler Christensen	I have so many concerns it will take some time to get them fully researched and written down, therefore an extension would be greatly needed and appreciated. I feel there is still such a large part of our community that has not been made aware of this project that could completely dismantle our aquifer. Also, there are not enough copies provided to the public and Jerome County's population is nearly 50% Hispanic and there is not a copy to provide them in Spanish. Please extend the deadline a minimum of 90 days in order to give our community enough time to	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4406-1	Cassie Christensen	Due to our limited time to currently reply, besides being available to the public in a hard copy they can take home, it should also be available in a more navigable format. The draft EIS has so many chapters on the BLM site to open, it makes it hard to use the search feature. A larger zip file would help to navigate this extensive document with more efficiency being it is nearly 2000 pages. Please strongly consider filing an extension for the maximum allotted time to help the people who care the most about this state.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4406-2	Cassie Christensen	Please take in consideration the limited amount of time that has been offered to the public for the comment period on the proposed Lava Ridge project. Our community is a working community and most people have to reply once they have returned home from their busy lives. The inability to navigate a physical copy is also limiting to many people because of their lack of internet or resources. LS Power should be responsible for providing the public copies of the draft EIS, in order for us to get our concerns out, as well as providing a copy in Spanish. Jerome County is 41.6% Hispanic according to the Census and between Minidoka, Cassia, Twin Falls, Jerome and Lincoln County there is an estimated to be over 36,300 Hispanics who reside in the area. This doesn't include the seasonal workers who come to the area in the summer to assist farmers. This is a huge discrimination against our local population.	See response to comment 10531-2, 11629-1, and 12555-1 (see in Table A-3kk, Public and Stakeholder Involvement).
4430-1	Miles Anderton	I want to ask you for an extension to read the EIS statement because it is more than 500 pages long. Please consider doing this thankyou!	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4441-1	Benson Willmore	Thank you for talking about the EIS project at Sawtooth Elementary School. We were wondering if you could give us a 30 day extension to read the EIS statement, past March 21. Thank you.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4462-1	Remington Coleman	I was wondering if you would give us a 30 day extension , past March 21str, to read the EIS statement.Thanks for the presentation.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4475-1	Chris Austin	I am humbly asking for a 90 day extension past the current March 21 deadline, for our comments on the Lava Ridge project. These substantive comments can take several of us quite a bit of time to research the subjects,	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).

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		since many of us have little if any experience in any of these fields. And due to the complexity of the project, we want to make sure we present to the BLM information that will be beneficial.	
45-1	Sue Williams	After attending the Lava Ridge meeting in Jerome on 2/2, and recognizing the level of detail contained in the draft EIS, I respectfully request that the deadline for comments be extended a minimum of 30 days. This extension would give more time to thoroughly understand the impacts noted in the document and provide time for the public to involve their own experts to analyze and provide substantive objections to this project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4539-1	Kelly Lee	and many others would greatly appreciate extending the comment period on lava ridge windmill project. I.am not a skilled researcher and need more time than the 3-21-23 deadline.thank you for your consideration .	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4564-1	Julee Austin	I am humbly asking for a 90 day extension past the current March 21 deadline, for our comments on the Lava Ridge project. These substantive comments can take several of us quite a bit of time to research the subjects, since many of us have little if any experience in any of these fields. And due to the complexity of the project, we want to make sure we present to the BLM information that will be beneficial.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4618-1	Douglas Miller	I write to request an extension of the public comment period for the Lava Ridge draft EIS. The draft EIS documents, as downloaded from the BLM Lava Ridge ePlanning website total a whopping 2614 pages. The draft EIS covers a wide and disparate variety of subject matter, much of which requires a specialized technical background to understand. It is unreasonable to expect any lay person to read, let alone critically review, these 2614 pages in 60 days. Therefore I request that the public comment period for the Lava Ridge draft EIS be extended a minimum of 90 days.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4641-1	Gevin Bennett	I would like to express my hope that the “Public Comment Period” be extended for a period of at least 90 days. This will allow additional time for the citizens of Southern Idaho to study and comment on this very important issue.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4664-1	Charlotte Moffitt	All I am asking you is if you guys could possibly wait until later before you make your decision about the lava ridge wind project so we have more time to look over the EIS statement.Can you at least have a 30 day extension.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4665-1	Emma Klein	All we are asking you, is if you could possibly wait before you make a decision about Lava Ridge Wind Project so we could have more time to look into the EIS statement.Can you give the people of Idaho at least a 30 day Extension, past March 21st?	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4666-1	Amelia Moffitt	I believe you should give people more time to look over the EIS statement. Something like a 30 day extension or more, because some people won't be able to let their voice be heard by March 21. Please take this into consideration. Have a good day	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4753-1	Joan Hurlock	I respectfully request a 30-60 day extension of the comment period for the draft EIS report regarding the Lava Ridge Wind Project. The magnitude of this project, and size and scope of the report, will require much more time to read through and study, for the public to submit appropriate comments. This project will have an estimated 84-125 year impact on our public lands. A 30-60 day extension is a small amount of time in comparison.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4757-1	Brian Olmstead	this EIS took a couple of years to produce. 60 days is simply NOT enough time for thousands of folks lijke me to write careful, respectful, knowledgeable comments to the hundreds of incompletely researched issues in the DEIS.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4768-2	Regina Smith	In addition, I would request more comment time, please extend the comment period so that we can continue our review.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4770-2	Brinya Olmstead	Please allow us more time for the public to consider and comment on this project. We need more time than a meager 60 days to consider and comment on all the relevent aspects of this project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4792-1	Kyle Kinoshita	We are a partner organization of Friends of Minidoka, and we support its request for a 30-day extension of the time for public comment, which is currently set to end on March 21 of this year. As the document is extensive and complex, we believe that more time is needed to review and analyze the report. Please allow time for the public to give informed reaction to the study.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4892-1	Cameron Stauffer	lease extend the comment period for Lava Ridge Wind project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
4966-2	Brinya Olmstead	I will end this email here but ask that you Please allow us more time for the public to consider and comment on this project. We need more time than a meager 60 days to consider and comment on all the relevent aspects of this project.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
5183-3	Gary Smith	I am asking for Public Meetings to be held in locations around the Treasure Valley to allow all that could be impacted a chance to submit comments and ask questions of BLM and the applicant before you decide. The Snake River Plain Aquifer is a major part of the Idaho Eco-System and should be protected at all costs.	See responses to comments 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement) and 11573-1 (see in Table A-3kk, Public and Stakeholder Involvement). See also the EIS water impacts analysis in Section 3.17 (Water and Wetland Resources).

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5599-1	Jennifer Reinhardt-Tessmer	I am writing to renew our firm's previous request for an extension to the public comment period (submitted on February 23, 2023) to make public comments due June 19, 2023. This is a 60-day extension from the current deadline of April 20, 2023.	See response to comment 10531-2 (see in Table A-3kk, Public and Stakeholder Involvement).
7370-2	Tara Tatton	My mother made the trip to your Shoshone office to pick up printed copies of the EIS for herself, our family, and friends. There were no print copies available, only digital and online. This fact alone limits the number of people who can easily read and respond. What about those who do not have computers and the internet? How about people who's only connection is with a smartphone? The document is far too large to download. How about the elderly, or others, who find computers difficult to navigate, or would have extreme difficulty sitting in front of a screen for the DAYS it will take to read this document? These people are valuable members of our community, and the lack of inclusive information has made it nearly impossible for them to form an EIS based opinion, much less have the ability to share that opinion with the BLM! As this document is in English only, anyone whose English is a second language, or only speaks another language would have to find a translator to read over a thousand pages on a computer! Costly, impractical, and unlikely to happen. Surely all parties are aware that we have a large Spanish speaking population in the Magic Valley, so of course it needs to be provided in Spanish. Furthermore, the CSI Refugee Center is instrumental in assisting the relocation of people from around the globe here to our area. These people will be affected by this project as well. Based on information from the CSI Refugee Center' online information, since 2012 these are the likely languages that would need translation: Afghani, Congolese, Sudanese, Iranian, Iraqi, Bhutanese, Burmese, and Eritreans! Of course, this center goes back to 1982, adding an additional fifteen languages to the ones I have already listed.	See responses to comments 10531-2, 11629-1, and 12555-1 (see in Table A-3kk, Public and Stakeholder Involvement).
9275-1	AJ Whitecotton	Because I feel that BLM failed to give full disclosure of the facts and all possible options including Option A, this Impact study should be extended again so that the public understands they had another option. I would ask that all who submitted comments on your web page and who commented on social media be notified also. Public meetings that used this material and charts will have to be repeated too.	Alternative A is the No Action alternative discussed in EIS Section 2.2. As described in Section 1.3 (Decision to be Made), the BLM will decide whether to grant, grant with modification, or deny a ROW grant. EIS Section 2.2 explains the option for BLM to deny the application. This alternative would not include impacts from construction of the project. The No Action represents the existing and future condition without addition of the project. This is discussed in the analysis in Chapter 3 and represents the background datasets shown on all draft EIS map figures. Where the final EIS includes map figures displaying all alternatives, Alternative A (the existing condition) is now included as its own map figure.
9787-1	Dawn Leiske	Please Inform me as to why there is no Spanish Version of the Lava Ridge Wind Turbines EIS for our Spanish speaking individuals in Idaho? I finally received the English 4th volume after weeks of trying to get a copy of the full volume. I noted on the cover of this last "4" volume, it states that Section 508 of the Rehabilitation Act of 1973 requires that the information in federal documents be accessible to individuals with disabilities (Not noted on any of the other volumes). But there is no mention of any languages, such as Spanish or Japanese, from which they may be directly affected by this project. Is there anything in Idaho law that states material such as this EIS from a federal government agency does not have to provide us with this information? Even the full English version was difficult to acquire. The Spanish version of the Lava Ridge Wind Turbines EIS is non-existence. How are Spanish speaking people going to write comments without a copy in Spanish? As we see more and more Spanish speaking individuals arrive into Idaho, why are they not being included? We are bending the laws of immigration by voting on illegals residing in Idaho drivers license, regardless of their immigration status: yet we can't get a Spanish speaking legal citizen a copy of the Lava Ridge Wind Turbines EIS?	See responses to comments 12555-1 and 11629-1 (see in Table A-3kk, Public and Stakeholder Involvement).

Purpose and Need

Table A-3ll. Purpose and Need

Comment ID	Commenter	Public Comment	Response to Comment
11210-6	Sheldon Ramsay	This project cannot be justified if wind were a reliable source of energy. How can it be justified from wind source whose actual performance of the technology is much worse than the calculations made based on 100% efficiency. And this poor performance is for existing turbine models not unproven 740 foot high Chinese manufactured ones which performance will be worse and which will haunt our landscape, and when they fail, our landfills.	See response to comment 11491-3 (see in Table A-3gg, Cumulative Effects).
11970-6	Janet Keegan	1.2, 1-1,2 References Executive Order (EO) #14008 to "increase renewable energy production on [public] lands." I suggest that EO #14008 clearly states a goal of "doubling offshore wind by 2030", but it does not state a measurable goal for wind production on terrestrial public land. See page 6 of EO #14008. Even though, the EO is not clear on how much wind energy, President Biden would like to see on public land, the DEIS and the head of the BLM, Tracey Stone-Manning states that she is following the mandate of the President in her reply to Idaho Representative Mike Simpson in the recent House Appropriations budget hearing. See my references below: eo-14008-tackling-climate-crisis-home-abroad.pdf (energy.gov) Budget Hearing – Fiscal Year 2024 Budget Requests for the Bureau of Land Management, U.S. Fish and Wildlife Service, and National Park Service | House Committee on Appropriations - Republicans Before a ROW is allowed in any form for the Lava Ridge project, the Final Environmental Impact Statement (FEIS) must reveal how much energy is actually	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that considers alternatives, analyzes impacts, and informs the BLM's decision. If authorized, this project would contribute approximately 1,000 MW of onshore wind energy generation from

Comment ID	Commenter	Public Comment	Response to Comment
		being produced and/or permitted to reach these vague goals as well as the policy expressed in 43 USC 3004(b) as stated on page 1-2 of Chapter 1 of the DEIS. Concrete goals as mandated elsewhere in the myriad of government documents, must be revealed to substantiate the NEED for the project. It is possible, that a genuine need relative to EO 14008 and 43 USC are covered by other renewable energy sources on public land.	BLM public lands. Because this project is furthest along in its evaluation of an onshore wind project on BLM public lands, other onshore wind projects would not meet this aspect of the purpose and need.
11978-2	Magic Valley Energy, LLC	Section 1.2 – Purpose and Need 3. MVE Comment: The BLM NEPA Handbook requires BLM to conform the purpose and need statement to "existing decisions, policies, regulation or law". In order to construct a robust purpose and need statement and ensure that BLM's purpose and need statement in the FEIS provides appropriate context in terms of addressing the numerous federal decisions, policies, regulations, or laws encouraging renewable energy development on federal lands, MVE would encourage BLM to consider incorporating summaries of the following in its purpose and need statement in the FEIS: • May 16, 2001 – The U.S. House of Representatives Committee on Science published a Report of the National Energy Policy Development Group, which was established to "develop a national energy policy designed to help the private sector, and, as necessary and appropriate, State and local governments, promote dependable, affordable, and environmentally sound production and distribution of energy for the future." • May 18, 2001 – Executive Order (EO) 13212, Actions to Expedite Energy-Related Projects, was signed to "implement recommendations from the National Energy Policy Development Group to establish a policy that federal agencies should take appropriate actions, to the extent consistent with applicable law, to expedite projects to increase the production, transmission, or conservation of energy." • August 8, 2005 – Energy Policy Act of 2005 (Public Law [P.L.] 109-58) was signed into law on August 8, 2005 stating "It is the sense of the Congress that the Secretary of the Interior should, before the end of the 10-year period beginning on the date of enactment of this Act, seek to have approved non-hydropower renewable energy projects located on the public lands with a generation capacity of at least 10,000-MWs of electricity." • 2009 – Wind Energy Development Program Instruction Memorandum (IM) No. WO- 2009-043 established by the BLM to further support wind energy development on public lands. The BLM initiated preparation of a Programmatic EIS in October 2003 and published the Record of Decision (ROD) for Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments in 2005. • December 8, 2021 – Executive Order, E.O. 14057, was issued for "Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability," which establishes a policy to "achieve a carbon pollution-free electricity sector by 2035 and net-zero emissions economy-wide by no later than 2050." The alignment of this goal with the need for clean energy infrastructure is detailed throughout the E.O., particularly in the following sections: o Section 101: "As the single largest land owner, energy consumer, and employer in the Nation, the Federal Government can catalyze private sector investment and expand the economy and American industry by transforming how we build, buy, and manage electricity, vehicles, buildings, and other operations to be clean and sustainable." o Section 102: "Leading the Nation on a firm path to net-zero emissions by 2050 and achieving the policy set forth in section 101 of this order will require bold action to transform Federal procurement and operations and secure a transition to clean, zero-emission technologies. Through a coordinated whole- of-government approach, the Federal Government shall use its scale and procurement power to achieve: (i) 100 percent carbon pollution-free electricity on a net annual basis by 2030, including 50 percent 24/7 carbon pollution-free electricity, as defined in section 603(a) of this order; …; and (vi) climate resilient infrastructure and operations." o Section 203: Addresses plans of transitioning to 100 percent carbon pollution- free electricity by stating that each agency shall "facilitate new carbon pollution-free electricity generation and energy storage capacity by authorizing use of their real property assets, such as rooftops, parking structures, and adjoining land, for the development of new carbon pollution-free electricity generation and energy storage through leases, grants, permits, or other mechanisms, to the extent permitted by law." • September 12, 2022 – "Executive Order on the Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022" prioritizes "driving progress to achieve the climate goals of the United States to reduce greenhouse gas emissions 50-52 percent below 2005 levels in 2030, achieve a carbon pollution-free electricity sector by 2035, and achieve net-zero emissions by no later than 2050. . . . [and] promoting construction of clean energy generation, storage, and transmission, and enabling technologies through efficient, effective mechanisms that incorporate community engagement."	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. The additional detail recommended would not change the evaluation of the project and would contribute to an extraneous amount of information that may result in the key purpose and need becoming less clear.
12054-2	Kevin Emmerich	Purpose and Need Statement: The Purpose and Need Statement should emphasize conservation goals relating to all of the impacts identified in the DEIS. The project is very controversial on many levels. Had BLM considered an alternative that would establish an Area of Critical Environmental Concern, the statement could reflect long-term conservation goals. The Purpose and Need Statement should be rewritten to recognize a Need to protect the cultural landscapes and scenic viewsheds protected by adjacent National Park Service lands. If the project were paused so the Monument RMP can be updated, conservation goals could be easily obtainable. Equally, the statement could be crafted to incorporate better wildlife conservation goals for golden eagles, pronghorn, bats, sage grouse and pygmy rabbits. According to BLM's NEPA Handbook4: The "purpose" can be described as a goal or objective that we are trying to reach. Often, the "purpose" can be presented as the solution to the problem described in the "need" for the action. In this case, we see a "need" to place a moratorium on the Lava Ridge Project until a solution to these controversial land use conflicts can be resolved. We request that the Purpose and Need Statement prioritize conservation over approval of industrial wind energy in this location.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. The SFO has a long history of establishing special designations for the protection of important resource values. In 1983, the *Monument Resource Management Plan* (BLM 1986) created the 128-acre Blue Heart Spring/Box Canyon Sensitive ACEC and the 105-acre Vineyard Creek Natural Area ACEC, as well as recommending 87,902 acres of suitable WSAs (Raven's Eye and Sand Butte WSA). The Great Rift WSA (179,990 acres) was also recommended suitable in a previous study. Nine other WSAs have been recommended suitable in the Timmerman Hills/Bennett Hills MFP area. The 1983 Sun Valley Management Framework Plan (MFP) was amended in 1991 to designate the Big Beaver-Little Beaver (6,282 acres), Sun Peak (560 acres), and Elk Mountain (7,753 acres) ACECs in the northern part of the Field Office for the protection of big game wintering habitat and a unique relic plant community. In 2000, Presidential Proclamation 7373 designated BLM lands as part of the Craters of the Moon National Monument, expanding the existing NPS Monument to 737,700 co-managed acres and closing those lands to future

Comment ID	Commenter	Public Comment	Response to Comment
			development. In 2003, a Land Tenure Plan Amendment added three more ACECs: Tee-Maze (10,762 acres), McKinney Butte (3,764 acres), and King Hill Creek (2,500 acres). In 2015, the *Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment* (BLM 2015) amended all the SFO land use plans and established allocations and limit travel to existing roads and trails to protect sage-grouse habitat. In all, the SFO has approximately 947,883 acres of special designation lands currently closed to development. Within the EIS, the BLM considers the potential impacts to resources that contribute to conservation values have and the protection set with the land use plan, as amended.
12307-2	Dean Dimond	An EO that dismisses the existing value and adverse impacts of other energy resources skews the purpose and need for this project in the first place. The Lava Ridge DEIS is arbitrary and capricious in assuming that the prior NEPA for other energy resources can be ignored. The Purpose and Need for this Wind Project is treated as stand-alone with no measurable impact to meet unidentified energy shortfalls from existing projects. In other words, to add a ROW of this size to BLM lands, we must be aware of what role this additional electric generating project will play in meeting the needs of the Nation's power grid and other energy needs to address cumulative effects and the actual environmental effects pursuant to the NEPA. Currently, the Council on Environmental Quality, with full oversight of NEPA compliance on all federal lands and assets, has published an NOI to change federal lands and resources NEPA analysis to match these two EOs for Environmental Justice and Climate Change. They intend to issue an "administrative" Categorical Exclusion to justify doing away with the current NEPA requirements. This further highlights my first substantive comment about this DEIS for Lava Ridge: It is fatally flawed as arbitrary and capricious in not addressing transparently the Purpose and Need for this project on federal public lands with the current NEPA criteria including cumulative effects of other existing energy production projects.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. See response to comment 11518-3 (see in Table A-3gg, Cumulative Effects).
12398-14	US Environmental Protection Agency	Project Purpose and Need Regarding the proposed project purpose and need, EPA recommends that the FEIS include: • A description of criteria used to determine the minimum project size that will be considered feasible. The DEIS does not discuss this directly, but for cumulative impacts, it seems projects that are considered in the realm of equivalent are those that produce over 500 MW. It also appears that under section 3.3.1.1.3, there is a lengthy discussion of Future Trends and Actions for wind development in the context of this project impacts to bats. This discussion provides more context for this analysis but may need to be expanded to clarify the minimum project size that will be considered feasible.	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. Technical and economic feasibility of wind energy projects require meeting the correct combination of core siting requirements. Defining a minimum project size would incorporate an incomplete assumption for the use of determining project feasibility. All proposals and alternatives should be determined feasible based on their ability to meet core siting requirements and their ability to meet the purpose and need. The purpose and need in the EIS is a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision.
12859-14	Kristen Brengel, Robyn Achilles; Friends of Minidoka	Chapter 1.2 Purpose and Need. We recommend replacing the current purpose and need section with the following: "In light of new information relating to the Minidoka Traditional Cultural Property (TCP) and the nomination for the Minidoka Area of Critical Environmental Concern (ACEC), the Bureau of Land Management is issuing a supplemental draft environmental impact statement regarding a plan amendment to the Monument Resource Management Plan (RMP) to designate an ACEC to protect the Minidoka National Historic Site, Minidoka Relocation Center, Minidoka TCP and important multiple uses and values including rangeland, cultural resources, scenery, wildlife and other values." The proposed new purpose and need section would align the Monument RMP land use inventory, planning and management activities, as required by FLPMA, with the listing of Minidoka on the National Register of Historic Places (1978), the National Monument designation (2001), the NPS General Management Plan (2006) and enactment of bipartisan Congressional legislation to expand, ratify and redesignate the Minidoka National Historic Site (2008).	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS to understand how the potential impacts relate to laws, regulations, and policies. Within the EIS, the BLM considers the potential impacts to resources that contribute to conservation values have and the protection set with the land use plan, as amended. The evaluation of land use plan allocations or special designations would require evaluation under a land use planning action and is outside the scope of the BLM's project specific evaluation of the project. See responses to comments 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics) and 11297-6 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site).
12859-15	Kristen Brengel, Robyn Achilles; Friends of Minidoka	At a minimum, the purpose and need section should include Congressional direction related to Minidoka.148 According to the D.C. Circuit, "[w]hen an agency is asked to sanction a specific plan, . . . the agency should take into account the needs and goals of the parties involved in the application [cites omitted]. Perhaps more importantly, an agency should always consider the views of Congress, expressed to the extent that the agency can determine them, in the agency's statutory authorization to act, as well as in other Congressional directives." The Purpose and Need Statement's should accurately reference Executive Order 14008, entitled "Tackling the Climate Crisis at Home and Abroad." The Climate Crisis E.O. states the goals of the Administration to reduce climate pollution and deliver environmental justice.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS and migratory birds to understand how the potential impacts relate to laws, regulations, and policies. See responses to comments 11297-6 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) and 12859-2 (see in Table A-3h, Environmental Justice and Socioeconomics).
12927-1	John Arkoosh	The DEIS states the need and purpose of the project is to combat climate change. The DEIS offers no evidence the project will in fact have a beneficial effect toward climate change. It appears to me that siting an energy project on 300 square miles, hundreds of miles from the point of energy use, with a power efficiency factor of around 35% and line loss of up to 10%, is not an environmentally friendly way to produce energy. Since this project will be sited entirely on public land and be funded in large part by tax credits, subsidies and grants. The EIS must address in depth the environmental and economic feasibility of the project. Including a	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated.

Comment ID	Commenter	Public Comment	Response to Comment
		transparent accounting of expected production, tax credits, grants and subsidies. The EIS must also conduct a thorough study of the environmental impact of the project in comparison to other methods of energy production. Just stating the climate change dogma that wind turbines will save the planet is not sufficient.	This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision.
13006-5	Leon Smith	Recommend replacing the current purpose and need with a purpose and need to preserve and protect the Minidoka National Historic and Relocation Center site, and additional federal land, to tell the whole story of their experience, as required by Congress. Support No Action Alternative A because of the significant negative impact on the Japanese American community and Minidoka National Historic Site.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. Within the EIS, the BLM fully considers impacts to resources such as Minidoka NHS to understand how the potential impacts relate to laws, regulations, and policies. See response to comment 1052-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding addition of new Section 3.19. Also see response to comment 11306-1 (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) (see in Table A-3q, Minidoka War Relocation Center and Minidoka National Historic Site) regarding potential impacts to Japanese American and other communities associated with Minidoka NHS as well as potential impacts to the natural and cultural landscape surrounding the site.
13006-30	Leon Smith	3) Recommend that the purpose and need statement address where the generated power is going and if the transmission line has the capacity to accept the power.	The BLM relies on industry to identify renewable energy technologies and general project locations and configurations that are technically and economically viable given current market conditions, renewable portfolio standards, technological advancements, and transmission access. The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. The purpose and need specifically states that the BLM may consider MVE's goals " . . . to generate renewable energy with wind turbines for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed along the permitted, but not-yet-constructed, SWIP-North."
6032-2	Peter Richardson	A full build-out of the proposed Lava Ridge project will generate approximately 1,000 MW (megawatts). While accurate, the jargon used in the electric industry can be confusing. 1,000 MW of wind power does NOT equate to 1,000 MW of energy available for local consumption. The typical wind project in Southern Idaho has a 'capacity factor' of approximately 33%. 3 That means over the course of a typical year, the project will be expected to consistently generate about one-third of its nameplate capacity. So, Idaho's energy deficit will not be reduced by 1,000 MW if Lava Ridge is fully built out, rather Idaho's energy deficit will only be reduced by about 333 MWh.	Table 2.4-1 within the EIS describes the estimated name plate capacity and the estimated annual generation for all action alternatives.
9080-32	The Coalition to Protect America's National Parks	Section 1.2 Purpose and Need (p.1-1) – First, we appreciate that the Purpose and Need statement provides for the possibility that BLM might deny MVE's ROW (ROW) grant application. Because the proposed action as well as any of the other action alternatives would have significant, unavoidable adverse effects on visual resources surrounding Minidoka NHS, the WRC, and Native American cultural sites such as Wilson Butte Cave, we strongly support Alternative A (No Action). It is the only alternative that would adequately protect the landscape settings of Minidoka NHS, the WRC, and Wilson Butte Cave. In contrast, we are very concerned that the Purpose and Need statement includes no mention of the "need" to conserve resources and values within the Project area. As stated in the DEIS (p. 1-1),"[t]he need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V)." This limited statement creates the impression that BLM is legally required to err on the side of "use" rather than "conservation." Despite its emphasis on allowing multiple uses, at its core FLMPA is a conservation law. For example, Section 102 (a)(8) of the Act states that: the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use. (Emphasis added.) We ask that BLM revise the Purpose and Need statement to reflect not only FLMPA's "multiple use mandate." The statement should also acknowledge the Act's "conservation mandate," which requires BLM to "protect the quality of… scenic [and] historical… values" as well. Otherwise, it sounds as if BLM's "mandate" is primarily focused on "use" rather than "conservation," which clearly is not the intent of FLPMA.	The BLM's purpose and need for action arises from the BLM's responsibility under FLPMA to respond to a ROW application requesting authorized use of public lands for a specific type of renewable energy development. The purpose and need in the EIS has been prepared to provide a brief and specific statement that provides clarity to the proposal being evaluated. This structure is in-line with requirements set within laws, regulations, and policies and facilitates the preparation of an EIS that effectively considers alternatives, analyzes impacts, and informs the BLM's decision. Within the EIS, the BLM considers the potential impacts to resources that contribute to conservation values have and the protection set with the land use plan, as amended.

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APPENDIX B

Notice of Availability

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[BLM_ID_FRN_MO4500168247]

Notice of Availability of the Draft Environmental Impact Statement for the Proposed Lava Ridge Wind Project in Jerome, Lincoln, and Minidoka Counties, ID

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of availability.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended (FLPMA), the Bureau of Land Management (BLM) announces the availability of the draft Environmental Impact Statement (EIS) for the proposed Lava Ridge Wind Project in Jerome, Lincoln, and Minidoka Counties, Idaho.

DATES: To afford the BLM the opportunity to consider comments in the final EIS, please ensure that the BLM receives your comments within 60 days following the date the Environmental Protection Agency (EPA) publishes its Notice of Availability (NOA) of the draft EIS in the **Federal Register**. The EPA usually publishes its NOAs on Fridays.

ADDRESSES: The draft EIS is available for review on the BLM ePlanning project website at *https://bit.ly/3uu3BuV.*

Written comments related to the Lava Ridge Wind Project may be submitted by any of the following methods:

- *ePlanning Website: https://bit.ly/3uu3BuV.*
- *Email: BLM_ID_LavaRidge@blm.gov.*
- *Mail:* Lava Ridge Wind Project EIS, BLM Shoshone Field Office, Attn: Kasey Prestwich, 400 West F Street, Shoshone, ID 83352.

Documents pertinent to this proposal may be examined online at: *https://bit.ly/3uu3BuV* and at the BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352.

FOR FURTHER INFORMATION CONTACT: Kasey Prestwich, project manager, telephone 208–732–7204; address BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352; email *kprestwich@blm.gov.* Individuals in the United States who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services for contacting Mr. Prestwich. Individuals outside the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States.

SUPPLEMENTARY INFORMATION:

Purpose and Need

Magic Valley Energy, LLC (MVE) has applied for a right-of-way (ROW) grant to construct, operate, maintain, and decommission the Lava Ridge Wind Project (the project), a wind energy facility and ancillary facilities primarily on BLM-administered public lands in Jerome, Lincoln, and Minidoka counties, Idaho. The BLM's purpose is to respond to the ROW application submitted by MVE in compliance with the FLPMA, BLM ROW regulations, and other applicable Federal laws and policies. The need for the BLM's Proposed Action arises from Title V of the FLPMA, which establishes a multiple use mandate for management of Federal lands, including ''systems for generation, transmission, and distribution of electric energy'' (43 U.S.C 1761).

Proposed Action and Alternatives

The project, as described by the Proposed Action (Alternative B), would be located primarily on public lands administered by the BLM Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho. The project would consist of up to 400 wind turbines and associated infrastructure, including new and improved roads, powerlines for collection and transmission of electricity, substations, operation and maintenance facilities, and a battery storage facility. The project's 500-kilovolt generation intertie transmission line would interconnect at Idaho Power Company's existing Midpoint Substation or at a new substation within the ROW corridor of the northern portion of the Southwest Intertie Project. The project's estimated generation capacity is 1,000 megawatts or more.

The project area spans 197,474 acres and all project components would be sited within a series of corridors. These corridors are approximately one-half mile wide and cover approximately 84,385 acres, of which 75,760 acres are located on public lands managed by the BLM, 2,910 acres are on State lands managed by the Idaho Department of Lands, 5,417 acres are on private lands, and 288 acres are on lands managed by the Bureau of Reclamation. All wind turbines, powerlines, and associated infrastructure would be located on lands managed by the BLM and the Idaho Department of Lands. The Bureau of Reclamation and private lands would include the use of existing public access roads, but no other project related infrastructure. The project infrastructure proposed within the corridors is estimated to have a 2,374-acre footprint and a total disturbance area of 9,114 acres.

Under the No Action Alternative, the Lava Ridge Wind Project would not be authorized and would not be constructed.

The project area of Alternative C would span 146,389 acres and the maximum number of turbines would be 378. Alternative C removes some siting corridors in the southwestern and northern portions of the project area to avoid or minimize potential impacts to Wilson Butte Cave, the Minidoka National Historic Site, and associated impacts to the Native American and Japanese American communities. Alternative C also removes siting corridors in the northern portion of the project area to reduce the potential for fragmenting wildlife habitat.

The project area of Alternative D would be the smallest of all action alternatives at 110,315 acres and the maximum number of turbines would be 280. Alternative D builds on the proposed changes in Alternative C that avoid and minimize potential impacts to Wilson Butte Cave, the Minidoka National Historic Site, and wildlife habitat. Alternative D further reduces potential impacts within wildlife habitat by removing siting corridors located in the eastern portion of the project area that have higher sagebrush cover that provide functional Greater sage-grouse habitat. Also, Alternative D would have substantially fewer wind turbines and less infrastructure than Alternatives B and C. It therefore would reduce the potential for bat and avian mortality and potential conflicts with livestock grazing operations.

The project area of Alternative E would span 122,444 acres and the maximum number of turbines would be 269. Alternative E builds off the proposed changes in Alternative C that avoid or minimize potential impacts to Wilson Butte Cave, the Minidoka National Historic Site, and wildlife habitat. Alternative E would remove siting corridors that are directly east of the Minidoka National Historic Site, resulting in this alternative having the least amount of visual impacts to the historic site. Like Alternative D, the smaller footprint and lower number of turbines would also reduce the potential for bat and avian mortality and potential conflicts with livestock grazing operations.

The BLM has identified Alternatives C and E as the agency's preferred alternatives. In selecting preferred alternatives, the BLM aims to consider project elements that balance energy production with reducing the potential for adverse impacts. Identification of these as the agency's preferred alternatives does not imply that one of these will be selected as the BLM's final decision. Information acquired during the public comment period could identify an alternative that blends elements of the agency's preferred alternatives, incorporates elements of any of the alternatives, or selects any of the five alternatives as the proposed alternative in the final EIS.

Draft EIS Preparation Process

A Notice of Intent to prepare an EIS was published in the **Federal Register** on August 20, 2021, (86 FR 46867), announcing the beginning of the public scoping process. The scoping period closed on October 20, 2021, and 1,478 comment submissions were received; of those, 1,157 are unique. A scoping report was prepared and is available on the project's ePlanning website *https://bit.ly/3uu3BuV.*

The scoping process and subsequent feedback received from agency resource specialists, Native American Tribes, cooperating agencies, consulting parties, and interested parties identified a range of concerns to be included in the EIS analysis. Concerns included, but were not limited to the following:

- Potential impacts to the Minidoka National Historic Site and associated impacts to Japanese American communities;
- Potential impacts to Wilson Butte Cave and associated impacts to Native American Tribes;
- Potential impacts to cultural resources associated with Native American habitation and early European-American settlement;
- Potential impacts to the Shoshone-Bannock Tribes' treaty rights, including the rights to hunt and harvest foods, medicines, and materials from their homeland;
- Potential impacts to big game winter range and movement corridors, bats, raptors, and the Greater sage-grouse general habitat management area;
- Potential impacts to permitted livestock grazing operations;
- Potential impacts to transportation networks needed to access the project; and
- Potential socioeconomic impacts.

Lead and Cooperating Agencies

The BLM is the lead agency responsible for completing the EIS and deciding whether to approve, approve with conditions, or deny MVE's request for a ROW grant. Cooperating agencies involved in the development of the draft EIS include the National Park Service, the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the State of Idaho, and the counties of Jerome, Lincoln, and Minidoka, Idaho.

Schedule for Decision Making Process

The final EIS is tentatively scheduled to be issued in summer 2023, with a Record of Decision in fall 2023.

Public Involvement Process

The BLM will hold virtual and in-person public meetings during the comment period. The date(s) and location(s) of meetings will be announced in advance through local media, email, mail, and the ePlanning project website *https://bit.ly/3uu3BuV.*

The purpose of public review of the draft EIS is to provide an opportunity for meaningful collaborative public engagement and for the public to provide substantive comments, such as identification of factual errors, data gaps, relevant methods, or scientific studies. You may submit comments at any time during the 60-day comment period by using one of the methods listed in the **ADDRESSES** section of this notice. The BLM will respond to substantive comments by making appropriate revisions to the EIS or explaining why a comment did not warrant a change.

The BLM will continue to consult with Indian Tribal Nations on a government-to-government basis in accordance with Executive Order 13175, BLM MS 1780, and other Departmental policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration.

The BLM will use the draft EIS review process to help fulfill the public involvement requirements under the National Historic Preservation Act (54 U.S.C. 306108), as provided in 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the Proposed Action will assist the BLM in identifying and evaluating impacts to such resources.

Before including your address, phone number, email 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 can 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.

(Authority: 40 CFR 1506.6, 40 CFR 1506.10)

Michael C. Courtney,

BLM Twin Falls District Manager.

[FR Doc. 2023–00646 Filed 1–19–23; 8:45 am]

BILLING CODE 4331–19–P

DEPARTMENT OF THE INTERIOR

National Park Service

[NPS–WASO–NRNHL–DTS#–35116; PPWOCRADI0, PCU00RP14.R50000]

National Register of Historic Places; Notification of Pending Nominations and Related Actions

AGENCY: National Park Service, Interior.

ACTION: Notice.

SUMMARY: The National Park Service is soliciting electronic comments on the significance of properties nominated before January 7, 2023, for listing or related actions in the National Register of Historic Places.

DATES: Comments should be submitted electronically by February 6, 2023.

ADDRESSES: Comments are encouraged to be submitted electronically to *National_Register_Submissions@nps.gov* with the subject line ''Public Comment on <property or proposed district name, (County) State>.'' If you have no access to email, you may send them via U.S. Postal Service and all other carriers to the National Register of Historic Places, National Park Service, 1849 C Street NW, MS 7228, Washington, DC 20240.

FOR FURTHER INFORMATION CONTACT: Sherry A. Frear, Chief, National Register of Historic Places/National Historic Landmarks Program, 1849 C Street NW, MS 7228, Washington, DC 20240, *sherry_frear@nps.gov,* 202–913–3763.

SUPPLEMENTARY INFORMATION: The properties listed in this notice are being considered for listing or related actions in the National Register of Historic Places. Nominations for their consideration were received by the National Park Service before January 7, 2023. Pursuant to section 60.13 of 36 CFR part 60, comments are being accepted concerning the significance of the nominated properties under the National Register criteria for evaluation.

Before including your address, phone number, email 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.

APPENDIX C

Public Meeting Notices and Announcements

U.S. Department of the Interior | Bureau of Land Management

Lava Ridge Wind Project Draft EIS Public Comment Period

The Bureau of Land Management (BLM) Shoshone Field Office issued a notice of availability for the draft environmental impact statement (EIS) for the Lava Ridge Wind Project on January 20, 2023, in accordance with the National Environmental Policy Act. To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement and has included the draft as Appendix 8 in the draft EIS.

The BLM is seeking public comment on the draft EIS and draft Programmatic Agreement during a 60-day public comment period that will close at 11:59 pm MDT on March 21, 2023.

Download the draft EIS and supporting materials: https://bit.ly/3EirzxD

For more information about the proposed Lava Ridge Wind Project:

Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Phone: 208-732-7204 **Email:** kprestwich@blm.gov **Website:** https://bit.ly/3EirzxD

Sign up for the project mailing list: https://forms.office.com/r/NDsr6rhtbs

U.S. Department of the Interior | Bureau of Land Management

Lava Ridge Wind Project Draft EIS Public Comment Period

The Bureau of Land Management (BLM) Shoshone Field Office issued a notice of availability for the draft environmental impact statement (EIS) for the Lava Ridge Wind Project on January 20, 2023, in accordance with the National Environmental Policy Act. To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement and has included the draft as Appendix 8 in the draft EIS.

The BLM is seeking public comment on the draft EIS and draft Programmatic Agreement during a 60-day public comment period that will close at 11:59 pm MDT on March 21, 2023.

Download the draft EIS and supporting materials: https://bit.ly/3EirzxD

For more information about the proposed Lava Ridge Wind Project:

Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Phone: 208-732-7204 Email: kprestwich@blm.gov Website: https://bit.ly/3EirzxD

Sign up for the project mailing list: https://forms.office.com/r/NDsr6rhtbs

U.S. Department of the Interior | Bureau of Land Management

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Sign up for the project mailing list: https://forms.office.com/r/NDsr6rhtbs

Submitting Comments

The most effective comments provide detailed information with clear rationale for why changes to the draft EIS or draft Programmatic Agreement are desired.

You may submit comments on the draft EIS in the following ways:

- Visit the BLM's project website: https://bit.ly/3EirzxD. Click on the "Participate Now" button to the left of the document link. Enter your comment and information, then click "Submit."
- E-mail to: BLM_ID_LavaRidge@blm.gov
- Delivered by hand or by mail and labeled "Lava Ridge Wind Project EIS" to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- Provided in writing or verbally to a designated court reporter during public meetings

To be considered in the development of the final EIS, comments must be postmarked by **March 21, 2023**.

Submittal of comments is completely voluntary and any identifying information provided will become part of the public record, and as such, must be released to any individual upon request. Requests to withhold comments and associated personal identifying information from public review cannot be guaranteed.

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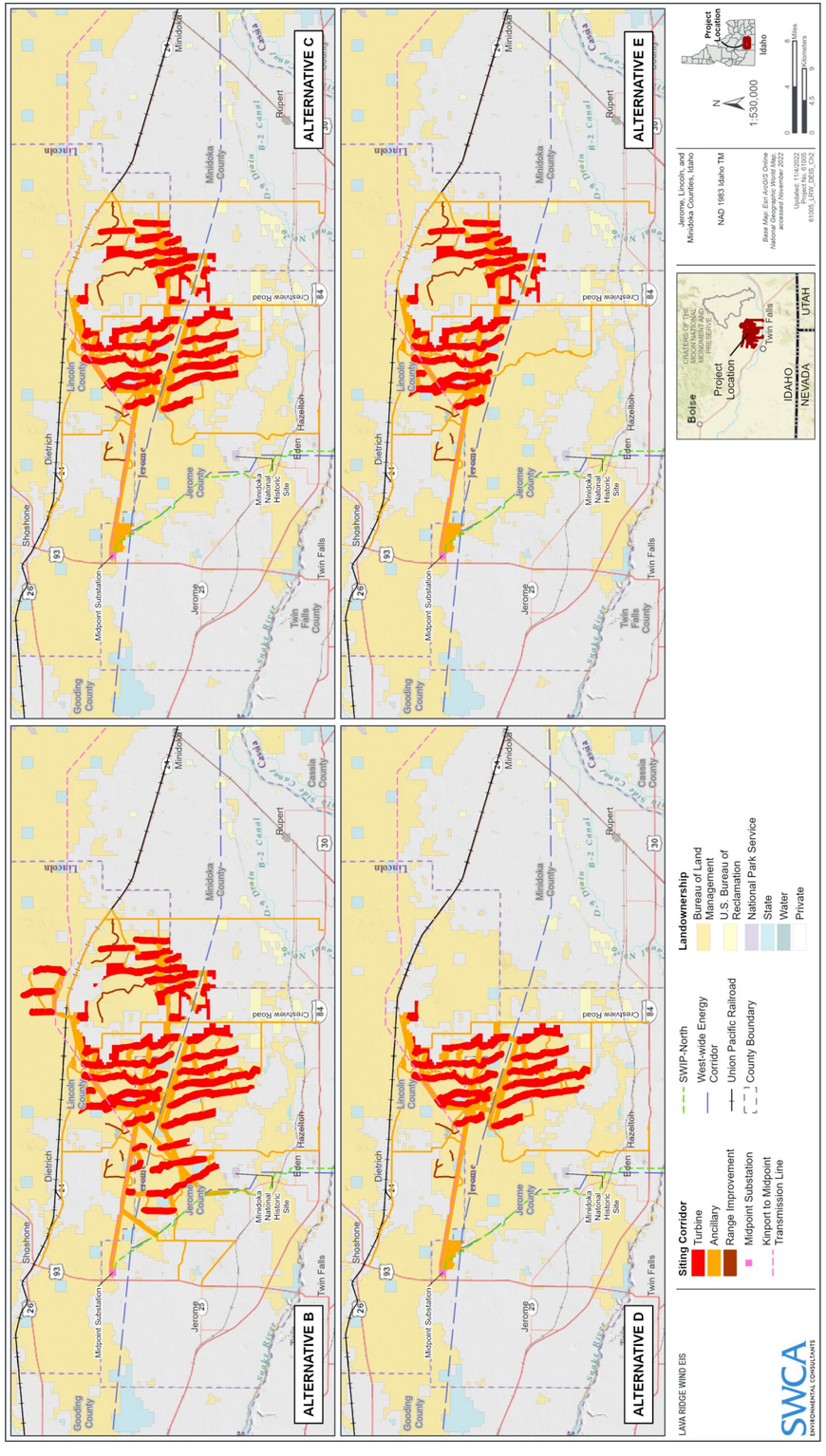
Lava Ridge Wind Project Draft Environmental Impact Statement
Map Comparison of Action Alternatives, January 2023



Lava Ridge Wind Project

Draft Environmental Impact Statement

January 2023

The Bureau of Land Management (BLM) Shoshone Field Office is seeking the public's review and comment on the draft environmental impact statement (EIS) and draft Programmatic Agreement for the proposed Lava Ridge Wind Project. The proposed project is a commercial-scale wind energy facility and would consist of up to 400 wind turbines and associated infrastructure, including new and improved roads, powerlines for collection and transmission of electricity, substations, operation and maintenance facilities, and a battery storage facility. The project would be located about 25 miles northeast of Twin Falls, Idaho. The project's 500-kilovolt generation intertie transmission line would interconnect at Idaho Power Company's existing Midpoint Substation or at a new substation within the right-of-way corridor of the northern portion of the Southwest Intertie Project.

Under the National Environmental Policy Act, the BLM developed the draft EIS using input provided by the public; from coordination with federal, state and local agencies; and through consultation with Native American Tribes. This input helped the BLM identify issues for analysis and develop alternatives to the Proposed Action. The draft EIS considers a range of alternatives that includes the Proposed Action, a no action alternative, and three additional action alternatives (see maps on page 4). The BLM has identified Alternatives C and E as the agency's preferred alternatives. In developing a decision, the BLM's Authorized Officer may select various components from each of the alternatives that best meet the purpose and need for the project.

To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement. The Programmatic Agreement will provide detail for how historic properties that may be affected by the Lava Ridge Wind Project will be identified, evaluated, and assessed for effects. A draft Programmatic Agreement has been prepared in coordination with consulting parties and is included as Appendix 8 in the draft EIS.

The BLM looks forward to receiving comments on the draft EIS and draft Programmatic Agreement. We encourage all who are interested to stay informed about the project by signing up for the project mailing list at https://forms.office.com/r/NDsr6rhtbs and to access the documents on the project's web page at https://bit.ly/3EirzxD.

Codie Martin, Field Manager

Download the draft EIS: https://bit.ly/3EirzxD

Read the draft EIS in hardcopy at the following locations:

- BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- BLM Twin Falls District Office, 2878 Addison Avenue East, Twin Falls, ID 83301
- BLM Burley Field Office, 15 East 200 South, Burley, ID 83318
- BLM Idaho State Office, 1387 South Vinnell Way, Boise, ID 83709

See attached insert for additional hardcopy locations.

For more information about the proposed Lava Ridge Wind Project:

Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Phone: 208-732-7204 **Email:** kprestwich@blm.gov **Website:** https://bit.ly/3EirzxD

Public Comment Period

The BLM submitted the draft EIS to the Environmental Protection Agency on January 13, 2023. The Environmental Protection Agency's notice of availability for the draft EIS is expected to be published in the *Federal Register* on January 20, 2023 and will begin a 60-day public comment period. The public comment period provides an opportunity for stakeholders and interested parties to provide feedback to the BLM on the draft EIS analysis, data sources, analytical methods, action alternatives, and mitigation measures. The BLM will respond to substantive comments received during the comment period in the final EIS. The BLM is also seeking public input on the draft Programmatic Agreement and will use the comments received to help finalize the document.

How to Comment Effectively

The most effective comments provide detailed information with clear rationale for why changes to the EIS or changes to the Programmatic Agreement are desired. To make the best use of your input, consider the following:

- Keep your comments focused on the proposed project and what is being analyzed.
- Describe the significance of the potential impacts and how they affect you, others, places, and activities.
- Provide any new information that is relevant to the project (e.g., potential affected resources).
- Discuss modifications to existing alternatives or suggest other reasonable alternatives with justification.
- Remember to provide detailed information and references to back up your comment.
- List the reasons why you are either in favor of or opposed to the project or specific features of the project.
- Make sure you submit your comments within the timeframe announced. This ensures the BLM will have all concerns documented for use in preparing the final EIS.
- Comments are not counted as votes or as a part of a referendum on the BLM's decision.

To be considered in the development of the final EIS, comments must be postmarked by March 21, 2023.

How can I participate in the EIS process and stay informed?

- Attend the public meetings to learn more about the project and ask questions.
- Submit a written comment on the draft EIS. You can use one of three ways:
  - Visit the BLM's project website: https://bit.ly/3EirzxD. Click on the "Participate Now" button to the right of the document link. Enter your comment and information, then click "Submit."
  - E-mail to: BLM_ID_LavaRidge@blm.gov
  - Delivered by hand or by mail and labeled "Lava Ridge Wind Project EIS" to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- Sign up for the project mailing list to receive project updates: https://forms.office.com/r/NDsr6rhtbs

Public Meetings

Orientation Meeting

The BLM will hold a virtual meeting early in the comment period to provide information about accessing and reviewing the draft EIS, participating in the review, and submitting comments.

Wednesday, February 1, 2023
2:00—4:00 pm Mountain
Virtual/Zoom webinar
Pre-register here:
https://bit.ly/LavaRidgeDEISIntro

Open Houses

The BLM will also hold both in-person and virtual open houses as agency Covid-related policy allows, providing opportunities to learn more about the analysis, speak with resource specialists and agency managers and provide comments.

Wednesday, February 22, 2023
2:00—4:00 pm Mountain
Lincoln County Community Center
201 South Beverly Street
Shoshone, ID 83352

Thursday, February 23, 2023
5:00—7:00 pm Mountain
Canyon Crest Event Center
330 Canyon Crest Drive
Twin Falls, ID 83301

Friday, February 24, 2023
2:00—4:00 pm Mountain
Virtual/Zoom webinar
Pre-register here:
https://bit.ly/LavaRidgePublicMtg

Wednesday, March 1, 2023
3:00—7:00 pm Pacific
DoubleTree by Hilton - Portland*
1000 NE Multnomah Street
Portland, OR 97232
**complimentary garage parking*

Thursday, March 2, 2023
3:00—7:00 pm Pacific
Mercer Island Community and Event Center
8236 South East 24th Street
Mercer Island, WA 98040

Virtual meetings will be hosted using the Zoom webinar application. The Zoom app is free to download and use and can be accessed on your computer, smartphone or tablet. You can also access the Zoom meetings using your web browser. There will be a call-in number for those who want to listen to the meeting by phone. Virtual meetings will require pre-registration using the links provided and you can pre-register up until the end of the meeting.

If you need special accommodations, please contact Jo Render at jo.render@galileoaz.com or (612) 213-7543.

Lava Ridge Wind Project
Draft Environmental Impact Statement

Hardcopy Locations

BLM Shoshone Field Office*
400 West F Street
Shoshone, ID 83352

BLM Burley Field Office*
15 East 200 South
Burley, ID 83318

BLM Twin Falls District Office*
2878 Addison Avenue East
Twin Falls, ID 83301

BLM Idaho State Office*
1387 South Vinnell Way
Boise, ID 83709

Japanese American Museum of Oregon**
411 NW Flanders St. STE 100
Portland, OR 97209

Oregon Buddhist Temple**
3720 SE 34th Ave
Portland, OR 97202

Bainbridge Public Library**
1270 Madison Ave N
Bainbridge Island, WA 98110

Japanese Cultural and Community Center of Washington**
1414 S Weller Street
Seattle, WA 98144

*Physical copies located at BLM offices will be available for review during normal business hours beginning January 13, 2023.

**The BLM has also coordinated with non-BLM locations to make physical copies available outside the local project area at locations familiar to Japanese American communities. Physical copies will be sent to these established locations prior to the beginning of the 60-day public comment period, to arrive on or around January 13, 2023. The availability of these copies at non-BLM locations are at the discretion of the location.

Electronic copies of the draft EIS are available for download at https://bit.ly/3EirzxD and additional physical copies can be made available if requested.

Bureau of Land Management
Lava Ridge Wind Project

The Bureau of Land Management (BLM) will hold a virtual orientation meeting to provide information about how you can access and review the draft environmental impact statement (EIS) and participate in the public comment period.

Orientation Meeting
Wednesday, February 1, 2023
2:00—4:00 pm Mountain
Virtual/Zoom webinar
Pre-register: **https://bit.ly/LavaRidgeDEISIntro**

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PUBLIC COMMENTS

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FOR MORE INFORMATION

If you have questions about the draft EIS or comment period, please contact Kasey Prestwich, Project Manager at kprestwich@blm.gov or (208) 732-7204.

Galileo Project, LLC | 4700 S McClintock Dr, Suite 100, Tempe, AZ 85282

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Bureau of Land Management
Lava Ridge Wind Project

The Bureau of Land Management (BLM) will host both in-person and virtual public open houses on the draft environmental impact statement (EIS) for the proposed Lava Ridge Wind Project.

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Bureau of Land Management
Lava Ridge Wind Project

BLM extends comment period for Lava Ridge Wind Project in response to stakeholder feedback

The Bureau of Land Management Twin Falls District will extend the public comment period for the Lava Ridge Wind Project draft environmental impact statement for an additional 30 days until April 20, 2023.

“The depth of the analysis in the impact statement has prompted many to request the public comment period be extended to allow more time for people to study the document,” said **BLM Twin Falls District Manager Mike Courtney**. “We are hopeful this extra time will alleviate concerns about being able to fully digest the document to allow for robust public feedback.”

The Lava Ridge Wind Project is a commercial-scale wind energy facility of up to 400 turbines proposed to be constructed on approximately 84,000 acres of Federal, State and private land about 25 miles northeast of Twin Falls in south-central Idaho. Magic Valley Energy, LLC, an affiliate of LS Power, is seeking authorization to construct the project in Jerome, Lincoln and Minidoka counties.

PUBLIC COMMENTS

Substantive comments that identify factual errors, data gaps, relevant methods or scientific studies are the most helpful. Comments can be submitted the following ways:

- The preferred way to comment is through the BLM’s ePlanning project site at **https://bit.ly/3uu3BuV**. Click on the “Participate Now” button to the left of the document link. Enter your comment and information, then click “Submit.”
- Through e-mail to **BLM_ID_LavaRidge@blm.gov**.

- Delivered by hand or U.S. mail enclosed in an envelope labeled “Lava Ridge Wind Project EIS,” to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352.

Those who provide comments should be aware that the entire comment–including personal identifying information like their address, phone number or e-mail address–may be made publicly available at any time. While commenters may ask to have their personal identifying information withheld from public review, the BLM cannot guarantee that they will be able to do so.

FOR MORE INFORMATION

If you have questions about the draft EIS or comment period, please contact Kasey Prestwich, Project Manager at kprestwich@blm.gov or (208) 732-7204.

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Bureau of Land Management
Lava Ridge Wind Project

Lava Ridge Wind Project Draft EIS Public Comment Period ends April 20, 2023

On January 20, 2023, the Bureau of Land Management (BLM) issued a Notice of Availability for the draft environmental impact statement (EIS) for the Lava Ridge Wind Project, in accordance with the National Environmental Policy Act. To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement and has included the draft as Appendix 8 in the draft EIS. The BLM is seeking public comment on the draft EIS and draft Programmatic Agreement during a 90-day public comment period that will close at 11:59 pm MDT on April 20, 2023.

To access the draft EIS and supporting materials please visit the BLM's ePlanning website at **https://bit.ly/3EirzxD**.

PUBLIC COMMENTS

You may submit a written comment on the draft EIS using one of three ways:

- Visit the BLM's project website: **https://bit.ly/3EirzxD**. Click on the "Participate Now" button to the left of the document link. Enter your comment and information, then click "Submit."
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Bureau of Land Management
Lava Ridge Wind Project

Lava Ridge Wind Project Draft EIS Public Comment Period ends April 20, 2023

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To access the draft EIS and supporting materials please visit the BLM's ePlanning website at **https://bit.ly/3EirzxD**.

PUBLIC COMMENTS

You may submit a written comment on the draft EIS using one of three ways:

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Oficina de Administración de Tierras

Proyecto eólico Lava Ridge

El borrador de la DIA del proyecto eólico de Lava Ridge finaliza el 20 de abril

El período de comentarios públicos para el borrador de la declaración de impacto ambiental (DIA) y el borrador del Acuerdo programático del Proyecto Eólico Lava Ridge se cerrará a las 11:59 p.m. MDT del 20 de abril de 2023.

El 20 de enero de 2023, la Oficina de Administración de Tierras (BLM) emitió un Aviso de disponibilidad para el borrador de la declaración de impacto ambiental (DIA) para el Proyecto eólico Lava Ridge (proyecto), de acuerdo con la Ley de política ambiental nacional. Para cumplir con la Sección 106 de la Ley Nacional de Preservación Histórica, la BLM está preparando un Acuerdo Programático y ha incluido el borrador como Apéndice 8 en el borrador de la DIA. La BLM está buscando comentarios públicos sobre el borrador de la DIA y el borrador del Acuerdo Programático.

Para acceder al borrador de la DIA y los materiales de apoyo, visite el sitio web de ePlanning de BLM en **https://bit.ly/3EirzxD**.

COMENTARIOS PÚBLICOS

Puede enviar un comentario por escrito sobre el borrador de la DIA utilizando una de las siguientes tres formas:

- Visite el sitio web del proyecto BLM: **https://bit.ly/3EirzxD**. Dé clic en el botón "Participar ahora" a la derecha del enlace del documento. Ingrese su comentario e información, después dé clic en "Enviar".
- Correo electrónico a: BLM_ID_LavaRidge@blm.gov
- Entregado en mano o por correo y etiquetado como "DIA de proyecto eólico de Lava Ridge" a Kasey Prestwich, Gerente de proyecto, oficina de campo Shoshone de BLM, 400 West F Street, Shoshone, ID 83352

Para ser considerado en el desarrollo de la DIA final, los comentarios deben tener matasellos antes del **20 de abril de 2023**.

El envío de comentarios es completamente voluntario y cualquier información de identificación proporcionada pasará a formar parte del registro público, y como tal, debe ser entregado a cualquier persona que lo solicite. No se pueden garantizar las solicitudes para retener comentarios y la información de identificación personal asociada de la revisión pública.

PARA MÁS INFORMACIÓN

Si tiene preguntas sobre el borrador de la DIA o el período de comentarios, comuníquese con Kasey Prestwich, gerente de proyectos en kprestwich@blm.gov o al (208) 732-7204.

Galileo Project, LLC | 4700 S McClintock Dr, Suite 100, Tempe, AZ 85282

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APPENDIX D

Public Meeting Handout

U.S. Department of the Interior
Bureau of Land Management

Lava Ridge Wind Project

Draft Environmental Impact Statement

The Bureau of Land Management (BLM) Shoshone Field Office is seeking public comment on the draft environmental impact statement (EIS) for the Lava Ridge Wind Project, a commercial-scale wind energy facility of up to 400 wind turbines and associated infrastructure, including new and improved roads, powerlines, substations, operation and maintenance facilities, and a battery storage facility. The project would have a generation capacity of 1,000 megawatts or more.

Purpose & Need

The BLM's purpose is to respond to Magic Valley Energy's application for a right-of-way (ROW) grant to construct, operate and maintain, and decommission a wind energy facility on public lands in compliance with Federal Land Policy and Management Act (FLPMA), BLM ROW regulations, and other applicable federal laws and policies. The need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V).

Agency's Preferred Alternatives

The draft EIS analyzes five alternatives: the No Action (Alternative A), the Proposed Action (Alternative B) and three additional action alternatives (Alternatives C, D, and E). The BLM has identified Alternatives C and E as the agency's preferred alternatives. Information acquired during the public comment period could identify an alternative that blends elements of the agency's preferred alternatives, incorporates elements of any of the alternatives, or selects any of the five alternatives as the preferred alternative in the final EIS.

Project Schedule

August 20, 2021	—	BLM initiates public scoping
October 20, 2021	—	Scoping period ends
January 20, 2023	—	Draft EIS released for public review
		Public comment period opens
April 20, 2023	—	Public comment period ends
Summer 2023	—	Final EIS released
Fall 2023	—	Record of Decision (ROD)

The BLM issued a notice of availability for the draft EIS for the Lava Ridge Wind Project on January 20, 2023, in accordance with the National Environmental Policy Act. To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement and has included the draft as Appendix 8 in the draft EIS. The BLM is seeking public comment on the draft EIS and draft Programmatic Agreement during a 90-day public comment period that will close at 11:59 pm MDT on April 20, 2023.

Accessing the draft EIS

Download the draft EIS: https://bit.ly/3EirzxD

Read the draft EIS in hardcopy at the following locations:

- BLM Shoshone Field Office*, 400 West F Street, Shoshone, ID 83352

- BLM Twin Falls District Office*, 2878 Addison Avenue East, Twin Falls, ID 83301
- BLM Burley Field Office*, 15 East 200 South, Burley, ID 83318
- BLM Idaho State Office*, 1387 South Vinnell Way, Boise, ID 83709
- Japanese American Museum of Oregon**, 411 NW Flanders St. STE 100, Portland, OR 97209
- Oregon Buddhist Temple**, 3720 SE 34th Ave, Portland, OR 97202
- Bainbridge Public Library**, 1270 Madison Ave N, Bainbridge Island, WA 98110
- Japanese Cultural and Community Center of Washington**, 1414 S Weller Street, Seattle, WA 98144

*Physical copies located at BLM offices are available for review during normal business hours beginning January 13, 2023.
**The BLM has also coordinated with non-BLM locations to make physical copies available outside the local project area at locations familiar to Japanese American communities. The availability of these copies at non-BLM locations are at the discretion of the location.

How to Comment

The most effective comments provide detailed information with clear rationale for why changes to the EIS or changes to the Programmatic Agreement are desired. To make the best use of your input, consider the following:

- Keep your comments focused on the proposed project and what is being analyzed.
- Describe the significance of the potential impacts and how they affect you, others, places, and activities.
- Provide any new information that is relevant to the project (e.g., potential affected resources).
- Discuss modifications to existing alternatives or suggest other reasonable alternatives with justification.
- Remember to provide detailed information and references to back up your comment.
- Make sure you submit your comments within the timeframe announced. This ensures the BLM will have all concerns documented for use in preparing the final EIS.
- Comments are not counted as votes or as a part of a referendum on the BLM's decision.

You may submit a written comment on the draft EIS in one of three ways:

- Visit the BLM's project website: https://bit.ly/3EirzxD. Click on the "Participate Now" button to the left of the document link. Enter your comment and information, then click "Submit."
- E-mail to: BLM_ID_LavaRidge@blm.gov
- Delivered by hand or by mail and labeled "Lava Ridge Wind Project EIS" to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352

To be considered in the development of the final EIS, comments must be postmarked by **April 20, 2023**.

Submittal of comments is completely voluntary and any identifying information provided will become part of the public record, and as such, must be released to any individual upon request. Requests to withhold comments and associated personal identifying information from public review cannot be guaranteed.

For More Information

For more information about the proposed Lava Ridge Wind Project and draft EIS, please contact:

Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Phone: 208-732-7204 **Email:** kprestwich@blm.gov **Website:** https://bit.ly/3EirzxD

Sign up for the project mailing list to receive project updates: https://forms.office.com/r/NDsr6rhtbs

Lava Ridge Wind Project

Draft Environmental Impact Statement

January 2023

The Bureau of Land Management (BLM) Shoshone Field Office is seeking the public's review and comment on the draft environmental impact statement (EIS) and draft Programmatic Agreement for the proposed Lava Ridge Wind Project. The proposed project is a commercial-scale wind energy facility and would consist of up to 400 wind turbines and associated infrastructure, including new and improved roads, powerlines for collection and transmission of electricity, substations, operation and maintenance facilities, and a battery storage facility. The project would be located about 25 miles northeast of Twin Falls, Idaho. The project's 500-kilovolt generation intertie transmission line would interconnect at Idaho Power Company's existing Midpoint Substation or at a new substation within the right-of-way corridor of the northern portion of the Southwest Intertie Project.

Under the National Environmental Policy Act, the BLM developed the draft EIS using input provided by the public; from coordination with federal, state and local agencies; and through consultation with Native American Tribes. This input helped the BLM identify issues for analysis and develop alternatives to the Proposed Action. The draft EIS considers a range of alternatives that includes the Proposed Action, a no action alternative, and three additional action alternatives (see maps on page 4). The BLM has identified Alternatives C and E as the agency's preferred alternatives. In developing a decision, the BLM's Authorized Officer may select various components from each of the alternatives that best meet the purpose and need for the project.

To comply with Section 106 of the National Historic Preservation Act, the BLM is preparing a Programmatic Agreement. The Programmatic Agreement will provide detail for how historic properties that may be affected by the Lava Ridge Wind Project will be identified, evaluated, and assessed for effects. A draft Programmatic Agreement has been prepared in coordination with consulting parties and is included as Appendix 8 in the draft EIS.

The BLM looks forward to receiving comments on the draft EIS and draft Programmatic Agreement. We encourage all who are interested to stay informed about the project by signing up for the project mailing list at https://forms.office.com/r/NDsr6rhtbs and to access the documents on the project's web page at https://bit.ly/3EirzxD.

Codie Martin, Field Manager

Download the draft EIS: https://bit.ly/3EirzxD

Read the draft EIS in hardcopy at the following locations:

- BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- BLM Twin Falls District Office, 2878 Addison Avenue East, Twin Falls, ID 83301
- BLM Burley Field Office, 15 East 200 South, Burley, ID 83318
- BLM Idaho State Office, 1387 South Vinnell Way, Boise, ID 83709

See page 5 for additional hardcopy locations.

For more information about the proposed Lava Ridge Wind Project:

Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Phone: 208-732-7204 **Email:** kprestwich@blm.gov **Website:** https://bit.ly/3EirzxD

Public Comment Period

The BLM submitted the draft EIS to the Environmental Protection Agency on January 13, 2023. The Environmental Protection Agency's notice of availability for the draft EIS is expected to be published in the *Federal Register* on January 20, 2023 and will begin a 60-day public comment period. The public comment period provides an opportunity for stakeholders and interested parties to provide feedback to the BLM on the draft EIS analysis, data sources, analytical methods, action alternatives, and mitigation measures. The BLM will respond to substantive comments received during the comment period in the final EIS. The BLM is also seeking public input on the draft Programmatic Agreement and will use the comments received to help finalize the document.

How to Comment Effectively

The most effective comments provide detailed information with clear rationale for why changes to the EIS or changes to the Programmatic Agreement are desired. To make the best use of your input, consider the following:

- Keep your comments focused on the proposed project and what is being analyzed.
- Describe the significance of the potential impacts and how they affect you, others, places, and activities.
- Provide any new information that is relevant to the project (e.g., potential affected resources).
- Discuss modifications to existing alternatives or suggest other reasonable alternatives with justification.
- Remember to provide detailed information and references to back up your comment.
- List the reasons why you are either in favor of or opposed to the project or specific features of the project.
- Make sure you submit your comments within the timeframe announced. This ensures the BLM will have all concerns documented for use in preparing the final EIS.
- Comments are not counted as votes or as a part of a referendum on the BLM's decision.

To be considered in the development of the final EIS, comments must be postmarked by March 21, 2023.

How can I participate in the EIS process and stay informed?

- Attend the public meetings to learn more about the project and ask questions.
- Submit a written comment on the draft EIS. You can use one of three ways:
  - Visit the BLM's project website: https://bit.ly/3EirzxD. Click on the "Participate Now" button to the right of the document link. Enter your comment and information, then click "Submit."
  - E-mail to: BLM_ID_LavaRidge@blm.gov
  - Delivered by hand or by mail and labeled "Lava Ridge Wind Project EIS" to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- Sign up for the project mailing list to receive project updates: https://forms.office.com/r/NDsr6rhtbs

Public Meetings

Orientation Meeting

The BLM will hold a virtual meeting early in the comment period to provide information about accessing and reviewing the draft EIS, participating in the review, and submitting comments.

Wednesday, February 1, 2023
2:00—4:00 pm Mountain
Virtual/Zoom webinar
Pre-register here:
https://bit.ly/LavaRidgeDEISIntro

Open Houses

The BLM will also hold both in-person and virtual open houses as agency Covid-related policy allows, providing opportunities to learn more about the analysis, speak with resource specialists and agency managers and provide comments.

Wednesday, February 22, 2023
2:00—4:00 pm Mountain
Lincoln County Community Center
201 South Beverly Street
Shoshone, ID 83352

Thursday, February 23, 2023
5:00—7:00 pm Mountain
Canyon Crest Event Center
330 Canyon Crest Drive
Twin Falls, ID 83301

Friday, February 24, 2023
2:00—4:00 pm Mountain
Virtual/Zoom webinar
Pre-register here:
https://bit.ly/LavaRidgePublicMtg

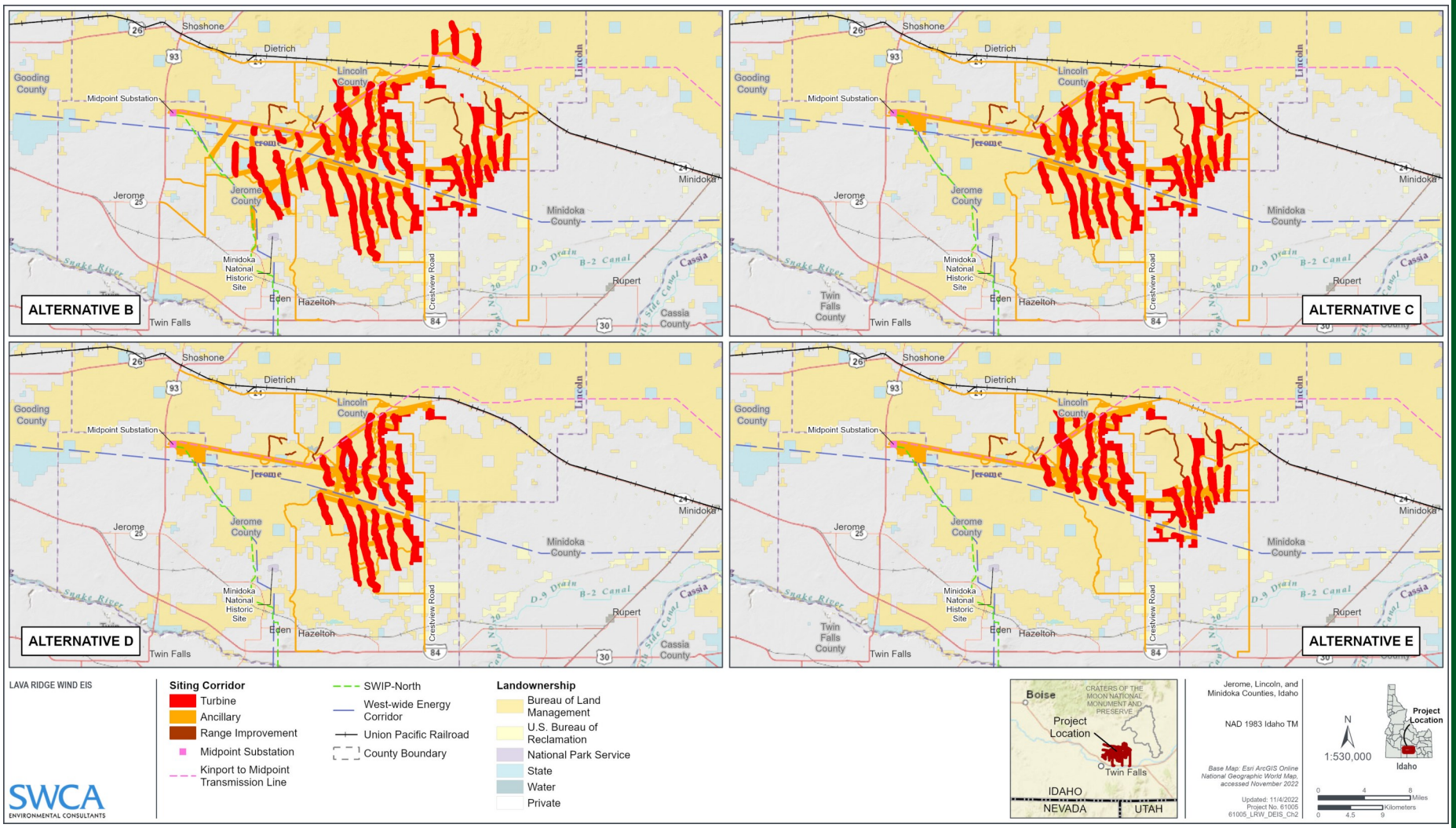
Wednesday, March 1, 2023
3:00—7:00 pm Pacific
DoubleTree by Hilton - Portland*
1000 NE Multnomah Street
Portland, OR 97232
**complimentary garage parking*

Thursday, March 2, 2023
3:00—7:00 pm Pacific
Mercer Island Community and Event Center
8236 South East 24th Street
Mercer Island, WA 98040

Virtual meetings will be hosted using the Zoom webinar application. The Zoom app is free to download and use and can be accessed on your computer, smartphone or tablet. You can also access the Zoom meetings using your web browser. There will be a call-in number for those who want to listen to the meeting by phone. Virtual meetings will require pre-registration using the links provided and you can pre-register up until the end of the meeting.

If you need special accommodations, please contact Jo Render at jo.render@galileoaz.com or (612) 213-7543.

Lava Ridge Wind Project Draft Environmental Impact Statement
Map Comparison of Action Alternatives, January 2023



Lava Ridge Wind Project
Draft EIS Hardcopy Locations

BLM Shoshone Field Office*
400 West F Street
Shoshone, ID 83352

BLM Burley Field Office*
15 East 200 South
Burley, ID 83318

BLM Twin Falls District Office*
2878 Addison Avenue East
Twin Falls, ID 83301

BLM Idaho State Office*
1387 South Vinnell Way
Boise, ID 83709

Japanese American Museum of Oregon**
411 NW Flanders St. STE 100
Portland, OR 97209

Oregon Buddhist Temple**
3720 SE 34th Ave
Portland, OR 97202

Bainbridge Public Library**
1270 Madison Ave N
Bainbridge Island, WA 98110

Japanese Cultural and Community Center of Washington**
1414 S Weller Street
Seattle, WA 98144

*Physical copies located at BLM offices will be available for review during normal business hours beginning January 13, 2023.

**The BLM has also coordinated with non-BLM locations to make physical copies available outside the local project area at locations familiar to Japanese American communities. Physical copies will be sent to these established locations prior to the beginning of the 60-day public comment period, to arrive on or around January 13, 2023. The availability of these copies at non-BLM locations are at the discretion of the location.

Electronic copies of the draft EIS are available for download at https://bit.ly/3EirzxD and additional physical copies can be made available if requested.

Proyecto Eólico Lava Ridge

Borrador de Declaración de Impacto Ambiental *Enero 2023*

La Oficina de Campo Shoshone de la Oficina de Administración de Tierras (BLM, por sus siglas en Inglés) busca la revisión y los comentarios del público sobre el borrador de la declaración de impacto ambiental (DIA) y el borrador del Acuerdo Programático para el Proyecto Eólico Lava Ridge propuesto. El proyecto propuesto es una instalación de energía eólica a escala comercial y constaría de hasta 400 turbinas eólicas e infraestructura asociada, incluyendo carreteras nuevas y mejoradas, líneas eléctricas para la recolección y transmisión de electricidad, subestaciones, instalaciones de operación y mantenimiento y una instalación de almacenamiento de baterías. El proyecto estaría ubicado aproximadamente a 25 millas al noreste de Twin Falls, Idaho. La línea de transmisión de interconexión de generación de 500 kilovoltios del proyecto se interconectaría a la Subestación Midpoint existente de Idaho Power Company o a una nueva subestación dentro del corredor de derecho de paso de la parte septentrional del Proyecto de Interconexión del Suroeste.

Bajo la Ley de Política Ambiental Nacional, la BLM desarrolló el borrador de la DIA utilizando los aportes proporcionados por el público; coordinación con agencias federales, estatales y locales; y a través de consultas con tribus nativas americanas. Estos aportes ayudaron a la BLM a identificar problemas en el análisis y a desarrollar alternativas a la Acción Propuesta. El borrador del DIA considera una gama de alternativas que incluye la Acción Propuesta, una alternativa de no acción y tres alternativas de acción adicionales (ver mapas en la página 4). La BLM ha identificado las Alternativas C y E como las alternativas preferidas de la agencia. Al desarrollar una decisión, el Oficial Autorizado de la BLM puede seleccionar varios componentes de cada una de las alternativas que mejor cumplan con el propósito y las necesidades del proyecto.

Para cumplir con la Sección 106 de la Ley Nacional de Preservación Histórica, la BLM está preparando un Acuerdo Programático. El Acuerdo Programático proporcionará detalles sobre cómo se identificarán, estimarán y evaluarán los efectos de las propiedades históricas que pueden verse afectadas por el Proyecto Eólico Lava Ridge. Se ha preparado un borrador de Acuerdo Programático en coordinación con las partes consultoras y se incluye como Apéndice 8 en el borrador de la DIA.

La BLM espera recibir comentarios sobre el borrador de la DIA y el borrador del Acuerdo Programático. Alentamos a todos los interesados a mantenerse informados sobre el proyecto registrándose en la lista de correo del proyecto en https://forms.office.com/r/NDsr6rhtbs y accediendo a los documentos en la página web del proyecto en https://bit.ly/3EirzxD.

Codie Martin, Gerente de Campo

Descargue el borrador de DIA: https://bit.ly/3EirzxD

Lea el borrador de la DIA en copia impresa en los siguientes lugares:

- Oficina local de BLM Shoshone, 400 West F Street, Shoshone, ID 83352
- Oficina de Distrito de Twin Falls de BLM, 2878 Addison Avenue East, Twin Falls, ID 83301
- Oficina local de BLM Burley, 15 East 200 South, Burley, ID 83318
- BLM Oficina Estatal de Idaho, 1387 South Vinnell Way, Boise, ID 83709

Consulte la página cinco para conocer las ubicaciones adicionales de las copias impresas.

Para obtener más información sobre el Proyecto Eólico Lava Ridge propuesto:

Kasey Prestwich, Gerente de Proyecto
Oficina local de BLM Shoshone
400 West F Street, Shoshone, ID 83352
Teléfono: 208-732-7204 **Correo electrónico:** kprestwich@blm.gov **Sitio web:** https://bit.ly/3EirzxD

Período de comentarios públicos

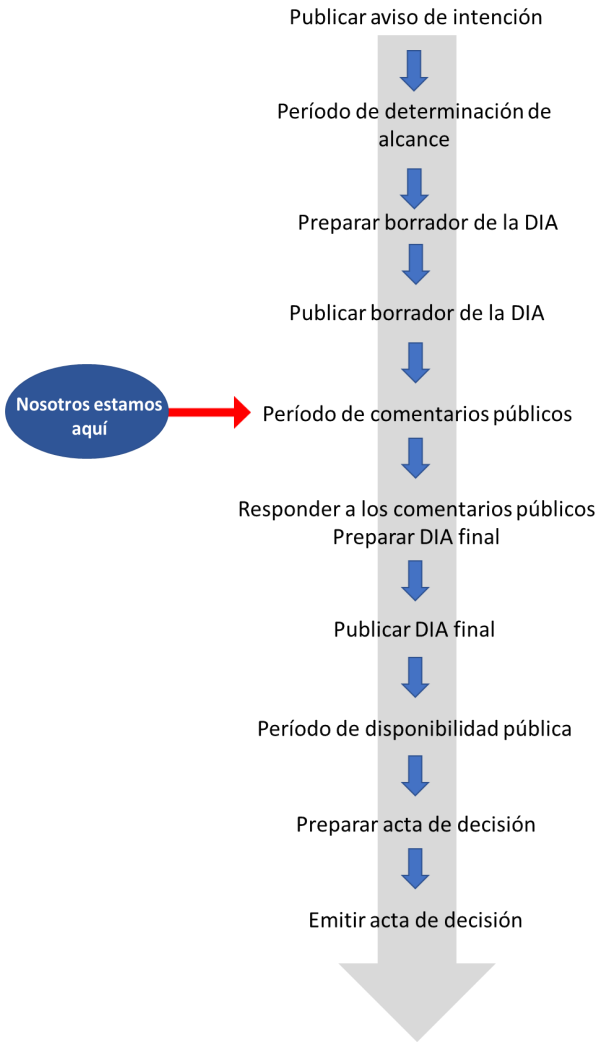
La BLM presentó el borrador de DIA a la Agencia de Protección Ambiental el 13 de enero de 2023. Se espera que el aviso de disponibilidad de la Agencia de Protección Ambiental para el borrador de la DIA se publique en el Registro Federal el 20 de enero de 2023 y comenzará un período de comentarios públicos de 60 días. El período de comentarios públicos brinda una oportunidad para que las partes interesadas proporcionen comentarios a la BLM sobre el borrador del análisis de la DIA, las fuentes de datos, los métodos analíticos, las alternativas de acción y las medidas de mitigación. La BLM responderá a los comentarios sustantivos recibidos durante el período de comentarios en la DIA final. La BLM también está buscando comentarios públicos sobre el borrador del Acuerdo Programático y utilizará los comentarios recibidos para ayudar a finalizar el documento.

¿Cómo comentar de manera efectiva?

Los comentarios más efectivos brindan información detallada con una justificación clara de por qué se desean cambios en la DIA o cambios en el Acuerdo Programático. Para poder hacer el mejor uso de sus comentarios, considere lo siguiente:

- Mantenga sus comentarios enfocados en el proyecto propuesto y lo que se está analizando.
- Describa la importancia de los impactos potenciales y cómo le afectan a usted, a otros, a los lugares y a las actividades.
- Proporcione cualquier información nueva que sea relevante para el proyecto (por ejemplo, los posibles recursos afectados).
- Discuta modificaciones a las alternativas existentes o proponga otras alternativas razonables con justificación.
- Recuerde proporcionar información detallada y referencias para respaldar su comentario.
- Enumere las razones por las que está a favor o en contra del proyecto o de las características específicas del proyecto.
- Asegúrese de enviar sus comentarios dentro del plazo anunciado. Esto asegura que la BLM tendrá todas las inquietudes documentadas para su uso en la preparación de la DIA final.
- Los comentarios no se cuentan como votos ni como parte de un referéndum sobre la decisión de la BLM.

Para ser considerado en el desarrollo de la DIA final, los comentarios deben contar con sello postal hasta el 21 de marzo de 2023.



¿Cómo puedo participar en el proceso de DIA y mantenerme informado?

- Asista a las reuniones públicas para obtener más información sobre el proyecto y hacer preguntas.
- Envíe un comentario por escrito sobre el borrador de la DIA. Puede usar una de estas tres formas:
  - Visite el sitio web del proyecto BLM: https://bit.ly/3EirzxD. Dé clic en el botón "Participar ahora" a la derecha del enlace del documento. Ingrese su comentario e información, después dé clic en "Enviar".
  - Correo electrónico a: BLM_ID_LavaRidge@blm.gov
  - Entregado en persona o por correo y etiquetado como "DIA de proyecto eólico de Lava Ridge" a Kasey Prestwich, Gerente de proyecto, oficina de campo Shoshone de BLM, 400 West F Street, Shoshone, ID 83352
- Regístrese en la lista de correo del proyecto para recibir actualizaciones del proyecto: https://forms.office.com/r/NDsr6rhtbs

Reuniones Públicas

Reunión de orientación

La BLM llevará a cabo una reunión virtual al principio del período de comentarios para proporcionar información sobre cómo acceder y revisar el borrador de DIA, participar en la revisión y enviar comentarios.

Miércoles, 1 de febrero de 2023
2:00—4:00 pm Horario de la montaña
Seminario web virtual/Zoom
Pre-registro aquí:
https://bit.ly/LavaRidgeDEISIntro

Puertas abiertas

La BLM también llevará a cabo jornadas de puertas abiertas tanto en persona como virtuales, conforme lo permita la política relacionada con Covid de la agencia, brindando oportunidades para obtener más información sobre el análisis, hablar con especialistas en recursos y gerentes de agencias y proporcionar comentarios.

Miércoles, 22 de febrero de 2023
2:00—4:00 pm Horario de la montaña
Centro Comunitario del Condado de Lincoln
201 South Beverly Street
Shoshone, ID 83352

Jueves, 23 de febrero de 2023
5:00—7:00 pm Horario de la montaña
Centro de Eventos Canyon Crest
330 Canyon Crest Drive
Twin Falls, ID 83301

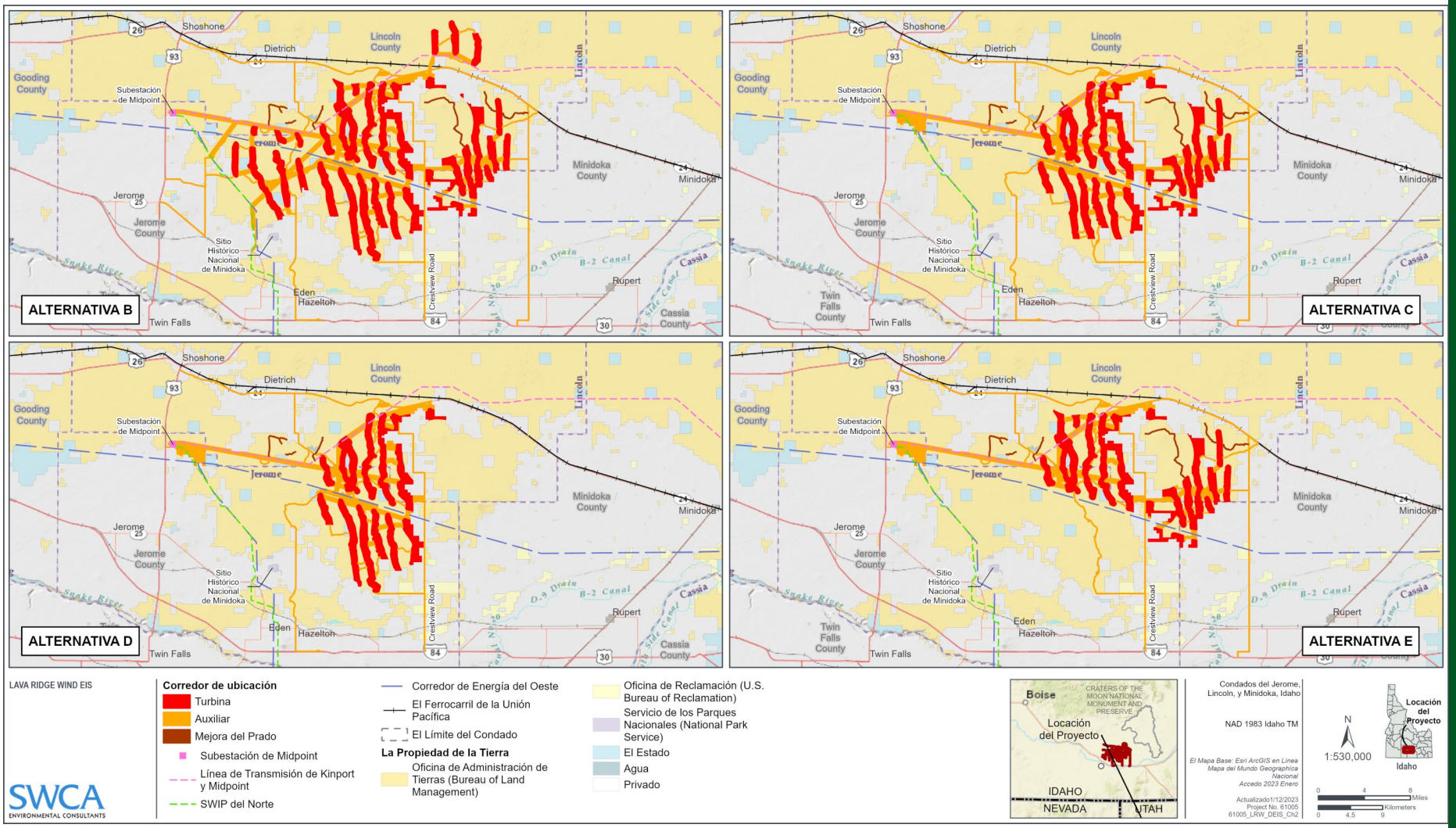
Viernes, 24 de febrero de 2023
2:00—4:00 pm Horario de la montaña
Seminario web virtual/Zoom
Pre-registro aquí:
https://bit.ly/LavaRidgePublicMtg

Miércoles, 01 de marzo de 2023
3:00—7:00 pm Horario del Pacífico
DoubleTree por Hilton - Portland*
1000 NE Multnomah Street
Portland, OR 97232
**estacionamiento en garaje de cortesía*

Jueves, 02 de marzo de 2023
3:00—7:00 pm Horario del Pacífico
Centro comunitario y de eventos de Mercer Island
8236 South East 24th Street
Mercer Island, WA 98040

Las reuniones virtuales se realizarán mediante la aplicación de seminarios web Zoom. La aplicación Zoom se puede descargar y usar de forma gratuita y se puede acceder a ella desde su computadora, teléfono inteligente o tableta. También puede acceder a las reuniones de Zoom usando su navegador web. Habrá un número de llamada para aquellos que quieran escuchar la reunión por teléfono. Las reuniones virtuales requerirán un registro previo utilizando los enlaces provistos y puede registrarse previamente hasta el final de la reunión.
Si necesita acomodaciones especiales, comuníquese con Jo Render en jo.render@galileoaz.com o al (612) 213-7543.

Borrador de Declaración de impacto ambiental del Proyecto Eólico Lava Ridge
Comparación de mapas de alternativas de acción, enero de 2023



Proyecto Eólico Lava Ridge
Ubicaciones de copias impresas

Oficina local de BLM Shoshone*
400 West F Street
Shoshone, ID 83352

Oficina local de BLM Burley*
15 East 200 South
Burley, ID 83318

Oficina de Distrito de Twin Falls de BLM*
2878 Addison Avenue East
Twin Falls, ID 83301

BLM Oficina Estatal de Idaho*
1387 South Vinnell Way
Boise, ID 83709

Museo Japonés Americano de Oregón**
411 NW Flanders St. STE 100
Portland, OR 97209

Templo budista de Oregón**
3720 SE 34th Ave
Portland, OR 97202

Biblioteca pública de Bainbridge**
1270 Madison Ave N
Bainbridge Island, WA 98110

Centro Cultural y Comunitario Japonés de Washington**
1414 S Weller Street
Seattle, WA 98144

*A partir del 13 de enero de 2023, las copias físicas ubicadas en las oficinas del BLM estarán disponibles para su revisión durante el horario normal de oficina.

**El BLM también ha coordinado con lugares que no pertenecen al BLM para que copias físicas estén disponibles fuera del área local del proyecto, en lugares que sean familiares para las comunidades japonesas-americanas. Las copias físicas se enviarán a estos lugares establecidos antes del inicio del período de comentarios públicos de 60 días, para que lleguen alrededor del 13 de enero de 2023. La disponibilidad de estas copias en lugares que no pertenecen al BLM queda a discreción del lugar.

Se pueden descargar copias electrónicas del borrador de EIS en https://bit.ly/3EirzxD y copias físicas adicionales estarán disponibles bajo previa solicitud.

APPENDIX E

Public Meeting Presentations

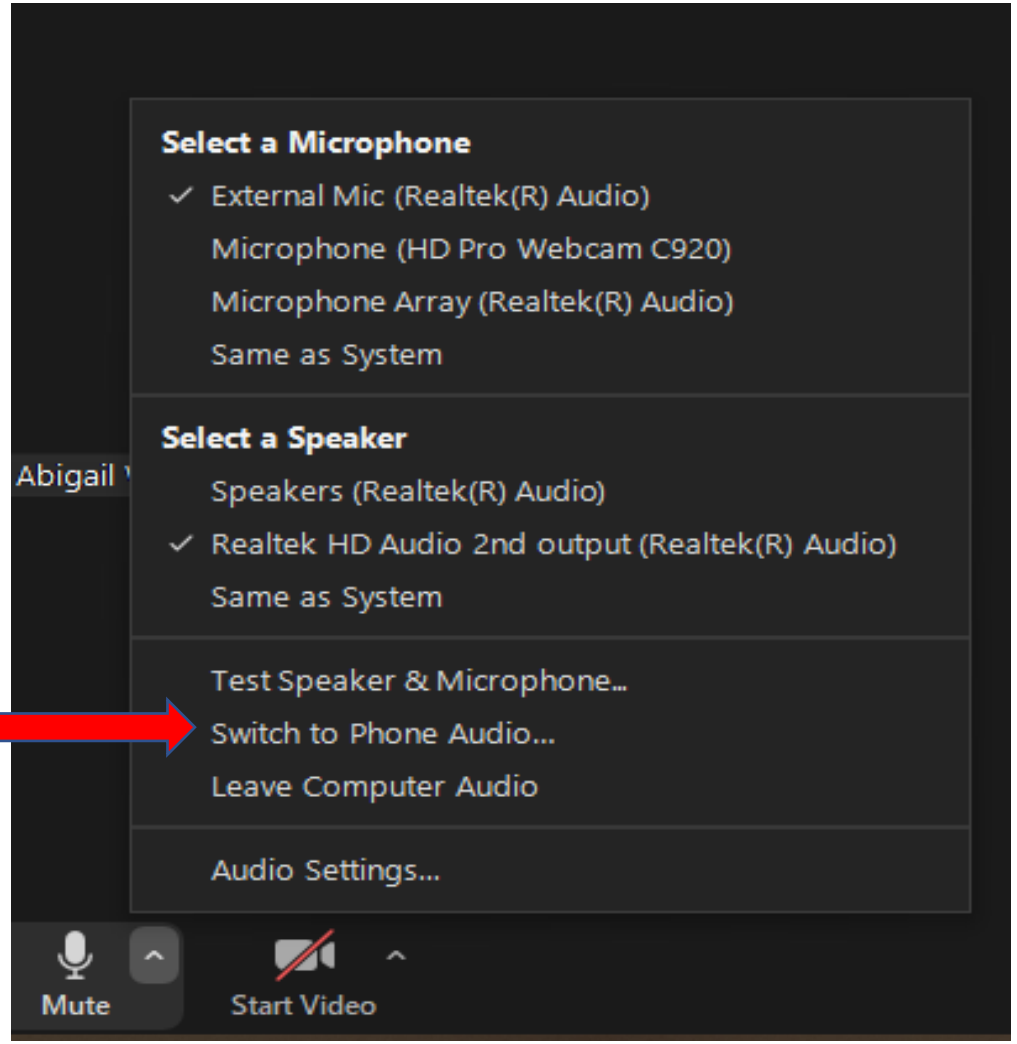
U.S. Department of the Interior
Bureau of Land Management

Draft Environmental Impact Statement for the Proposed Lava Ridge Wind Project

February 2023

Before We Begin

- This meeting is being recorded
- Attendees are muted and video feeds are turned off
- **Computer audio difficulties?** You can use your phone for audio by:
  - Clicking on Mic settings at the bottom left corner of your screen
  - Select "Switch to Phone Audio…"
- **Dial-in information**
  - Phone number: +1 253 205 0468
  - Webinar ID: 892 8235 1703
  - This may be a toll call.
- **Phone controls**
  - Raise/lower hand: *9
  - Mute/unmute: *6



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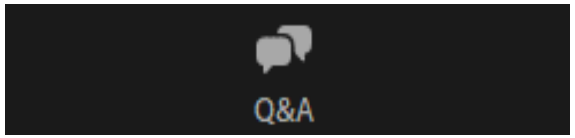
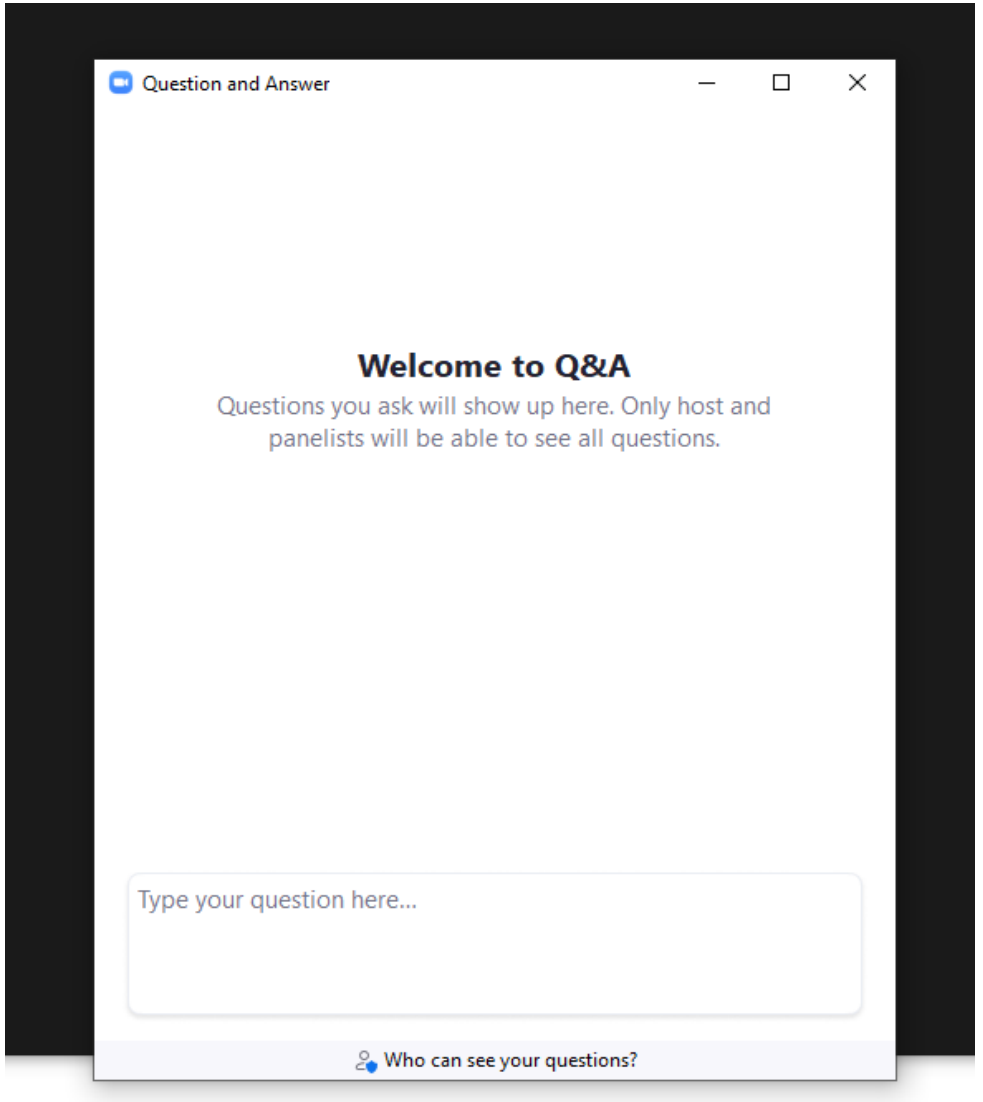




Meeting Panelists & Moderator

Kasey Prestwich
Bureau of Land Management
Shoshone Field Office
Project Manager

Codie Martin
Bureau of Land Management
Shoshone Field Office
Field Manager

Mike Courtney
Bureau of Land Management
Twin Falls District
District Manager

Heather Tiel-Nelson
Bureau of Land Management
Twin Falls District
Public Affairs Specialist

Jamie Young
SWCA
EIS Project Manager

Leyla Arson
SWCA
EIS Deputy Project Manager

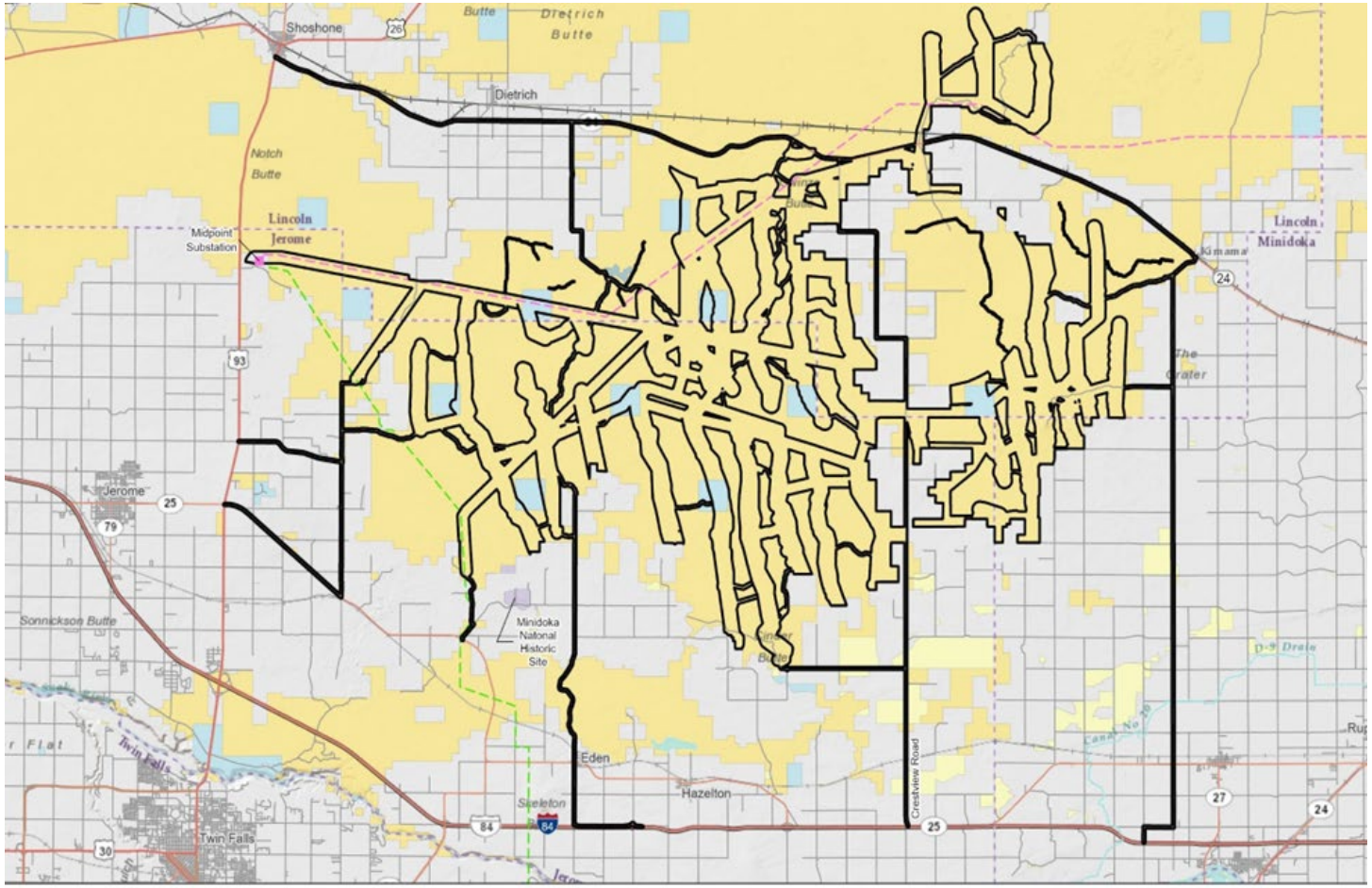
Jo Render
Galileo Project, LLC
Meeting Moderator

Meeting Objectives

This meeting will provide an overview of:

- National Environmental Policy Act (NEPA) process
- Where to access and download documents
- The draft Environmental Impact Statement (EIS)
- How to participate in the public comment period
- Upcoming open house meetings

Background



- Magic Valley Energy (MVE) applied for a right-of-way grant for a wind energy facility on public lands
- The BLM issued a Notice of Intent and held public scoping August – October 2021
- The BLM prepared a draft EIS to evaluate the proposed project and to respond to MVE's application

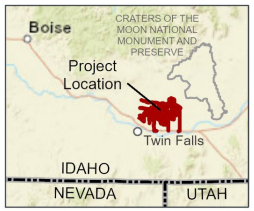
U.S. Department of the Interior
Bureau of Land Management

Overview of Alternatives

LAVA RIDGE WIND EIS

Siting Corridor
- Turbine
- Ancillary
- Range Improvement
- Midpoint Substation
- Kinport to Midpoint Transmission Line
- SWIP-North
- West-wide Energy Corridor
- Union Pacific Railroad
- County Boundary

Landownership
- Bureau of Land Management
- U.S. Bureau of Reclamation
- National Park Service
- State
- Water
- Private



Jerome, Lincoln, and Minidoka Counties, Idaho

NAD 1983 Idaho TM

Base Map: Esri ArcGIS Online National Geographic World Map, accessed November 2022

Updated: 11/4/2022
Project No. 61005
61005_LRW_DEIS_Ch2

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0 4 8 Miles
0 4.5 9 Kilometers

SWCA ENVIRONMENTAL CONSULTANTS

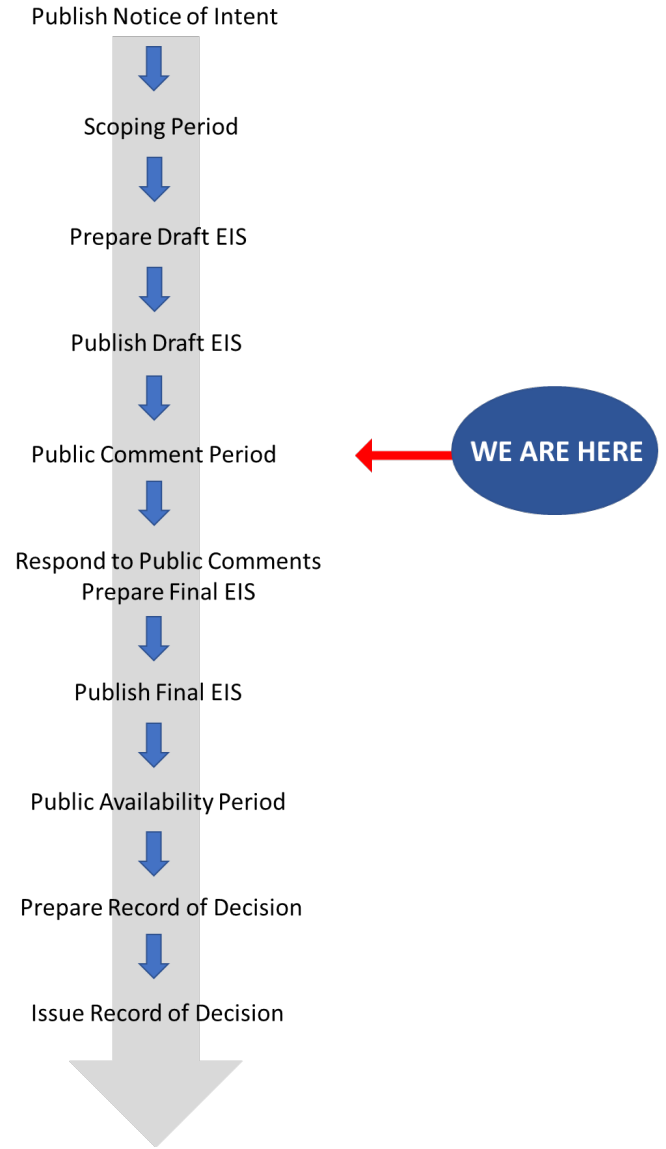
NEPA Process

What is an EIS?

An EIS is prepared to analyze and disclose effects of a proposed action on the natural and human environment, and to consider reasonable alternatives and mitigation measures.

How is the public involved?

The notice of availability for the draft EIS was published in the *Federal Register* on January 20, 2023, beginning a 60-day public comment period.



Purpose of the Public Comment Period

The purpose of the public comment period is to solicit comments from the public on:

- Draft Environmental Impact Statement analysis, data sources, analytical methods, action alternatives, and mitigation measures
- Draft Programmatic Agreement developed under Section 106 of the National Register of Historic Preservation Act

60-day public comment period: January 20 – March 21, 2023

U.S. Department of the Interior
Bureau of Land Management

Where to Access the Draft EIS

BLM's ePlanning website: https://bit.ly/3EirzxD

EplanningUi

eplanning.blm.gov/eplanning-ui/project/2013782/510

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

BLM National NEPA Register

DOI-BLM-ID-T030-2021-0015-EIS

- Home
- Documents
- Maps
- Map Data
- News
- How to Get Involved
- Related Projects & Links

Last Updated: 9/22/2022, 10:19:34 MDT

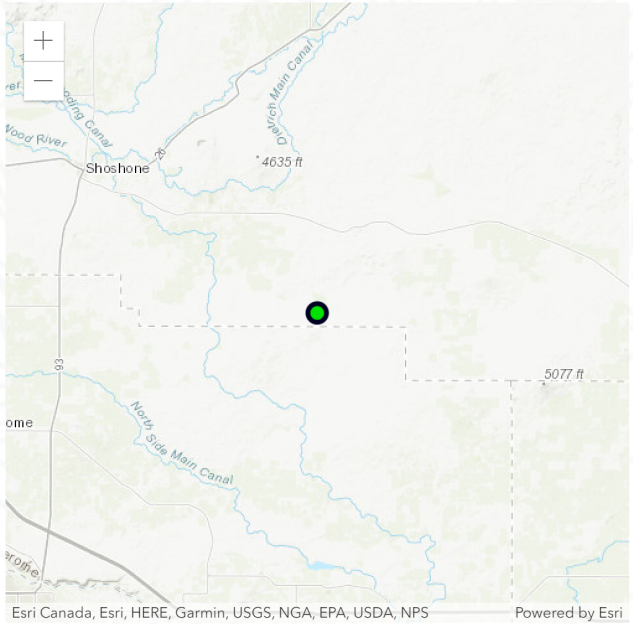
Lava Ridge Wind Project

Project Information

NEPA Number:	DOI-BLM-ID-T030-2021-0015-EIS
Project Name:	Lava Ridge Wind Project
Project Type:	Environmental Impact Statement
Project Status:	In Progress - Analysis & Document Preparation
Lead Office:	Shoshone FO
Last Updated:	09/22/2022 10:19:34 MDT

Project Description

Magic Valley Energy, LLC (MVE) seeks authorization to use Federal lands to construct, operate, maintain, and decommission the Lava Ridge Wind Project. The proposed project is located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within Jerome, Lincoln, and Minidoka Counties. The project's planned 500 kilovolt (kV) transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, or at an alternative location inside the right-of-way corridor for the not yet constructed, Southwest Intertie Project – Northern Portion (SWIP-North). The proposed project includes up to 400 wind turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers and construction-related staging yards. The project proposal has identified a range of possible turbine sizes that would have a generating capacity of 2 to 6 megawatts (MW) per turbine and would



Proiect Location

Hard Copy Draft EIS Locations

Location	Address
BLM Shoshone Field Office	400 West F Street, Shoshone, ID 83352
BLM Burley Field Office	15 East 200 South, Burley, ID 83318
BLM Twin Falls District Office	2878 Addison Avenue East, Twin Falls, ID 83301
BLM Idaho State Office	1387 South Vinnell Way, Boise, ID 83709
Japanese American Museum of Oregon	411 NW Flanders St. STE 100 Portland, OR 97209
Oregon Buddhist Temple	3720 SE 34th Ave Portland, OR 97202
Japanese Cultural and Community Center of Washington	1414 S Weller Street Seattle, WA 98144
Bainbridge Public Library	1270 Madison Ave N, Bainbridge Island, WA 98110

Overview of the Draft EIS

Volume 1

- Executive Summary
- Chapter 1. Introduction
- Chapter 2. Proposed Action and Alternatives
- Chapter 3. Affected Environment and Impacts

Volume 2

- Appendix 1. Plan of Development (Proposed Action) and related management plans

Volume 3

- Appendix 2 through Appendix 4 and Appendix 6 through Appendix 11

Volume 4

- Appendix 5. Select Visual Resources Simulations

Other Materials

Supporting materials can be accessed on the BLM's ePlanning website including:

- Analysis of Avian and Bat Mortalities at Existing Wind Facilities Report
- Year 1 Avian Use Study
- Bat Activity and North American Bat Surveys
- Year 2 Bat Acoustic Monitoring Surveys
- Vegetation Assessment Technical Memorandum
- Night Skies Analysis Report
- Wetlands and Waters Desktop Assessment
- Aquatic Resources Inventory Report
- Hydrogeologic Analysis Technical Memo
- Noise Technical Report
- Visual Resources Technical Report
- Stakeholder Assessment and Engagement Report

How to Participate

- Review the Draft EIS
  - On the BLM website: https://bit.ly/3EirzxD
  - Visit a hard copy location
- Attend public meetings
- Provide comments
- Sign up to be on the project mailing list: forms.office.com/r/NDsr6rhtbs
  - Please include your name and all relevant contact information when you complete the form.

Upcoming Public Open Houses

Idaho	Zoom Webinar	Oregon & Washington
Wednesday, February 22, 2023 Time: 2:00-4:00pm Mountain Location: Lincoln County Community Center Address: 201 South Beverly Street Shoshone, ID 83352 **Thursday, February 23, 2023** Time: 5:00-7:00pm Mountain Location: Canyon Crest Event Center Address: 330 Canyon Crest Drive Twin Falls, ID 83301	**Friday, February 24, 2023** Time: 2:00-4:00pm Mountain Virtual/Zoom Webinar Pre-register here: https://bit.ly/LavaRidgePublicMtg	**Wednesday, March 1, 2023** Time: 3:00-7:00pm Pacific Location: DoubleTree by Hilton – Portland Address: 1000 NE Multnomah Street, Portland, OR 97232 **Thursday, March 2, 2023** Time: 3:00-7:00pm Pacific Location: Mercer Island Community and Event Center Address: 8236 SE 24th St Mercer Island, WA 98040

How to Submit Comments

- The preferred way to comment is through the BLM's ePlanning project site at https://bit.ly/3EirzxD. Click on the "Participate Now" button to the left of the document link. Enter your comment and information then click "Submit."
- Through e-mail to BLM_ID_LavaRidge@blm.gov
- Delivered by hand or U.S. mail enclosed in an envelope labeled "Lava Ridge Wind Project EIS," to Kasey Prestwich, project manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- Provide comment during the Open House public meetings

Make sure you submit your comments by the end of the comment period

March 21, 2023

Types of Effective Comments

- Provide detailed information with rationale for why changes to the EIS or changes to the draft Programmatic Agreement are desired
- Describe the significance of the potential impacts and how they affect you, others, places, and activities
- Provide any new information that is relevant to the project
- Discuss modifications to existing alternatives or suggest other reasonable alternatives with justification
- Explain why you are in favor of or opposition to the project or specific features of the project, with a reasoned basis related to the analysis

Submit comments by March 21, 2023

How to Participate

- Review the Draft EIS
  - On the BLM website: https://bit.ly/3EirzxD
  - Visit a hard copy location
- Attend public meetings
- Provide comments
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  - Please include your name and all relevant contact information when you complete the form.

For More Information

Kasey Prestwich
Lava Ridge Wind Project EIS Project Manager
Phone: 208-732-7204
E-mail: kprestwich@blm.gov
Project website: https://bit.ly/3EirzxD

Questions on how to access documents and submit comments on the project?

Lava Ridge Wind Project

Draft Environmental Impact Statement

Public Meeting, February 24, 2023

BLM

Before We Begin

- This meeting is being recorded
- Attendees are muted and video feeds are turned off
- **Computer audio difficulties?** You can use your phone for audio by:
  - Clicking on Mic settings at the bottom left corner of your screen
  - Select “Switch to Phone Audio…”
- **Dial-in information**
  - Phone number: +1 253 205 0468
  - Webinar ID: 821 5598 1661
  - This may be a toll call.
- **Phone controls**
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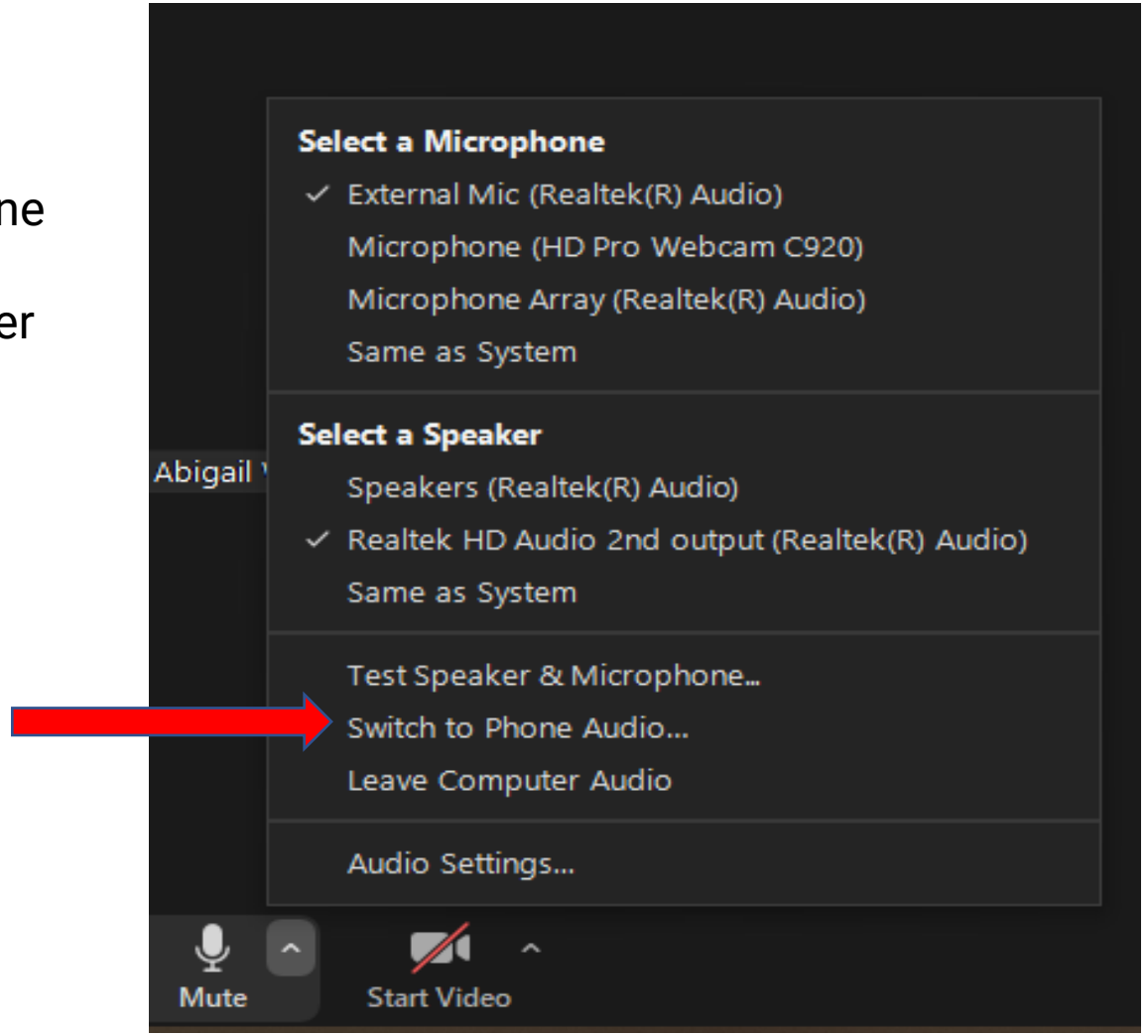

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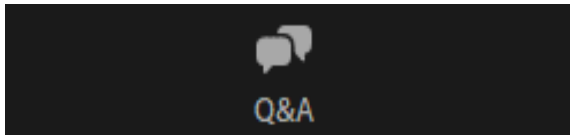
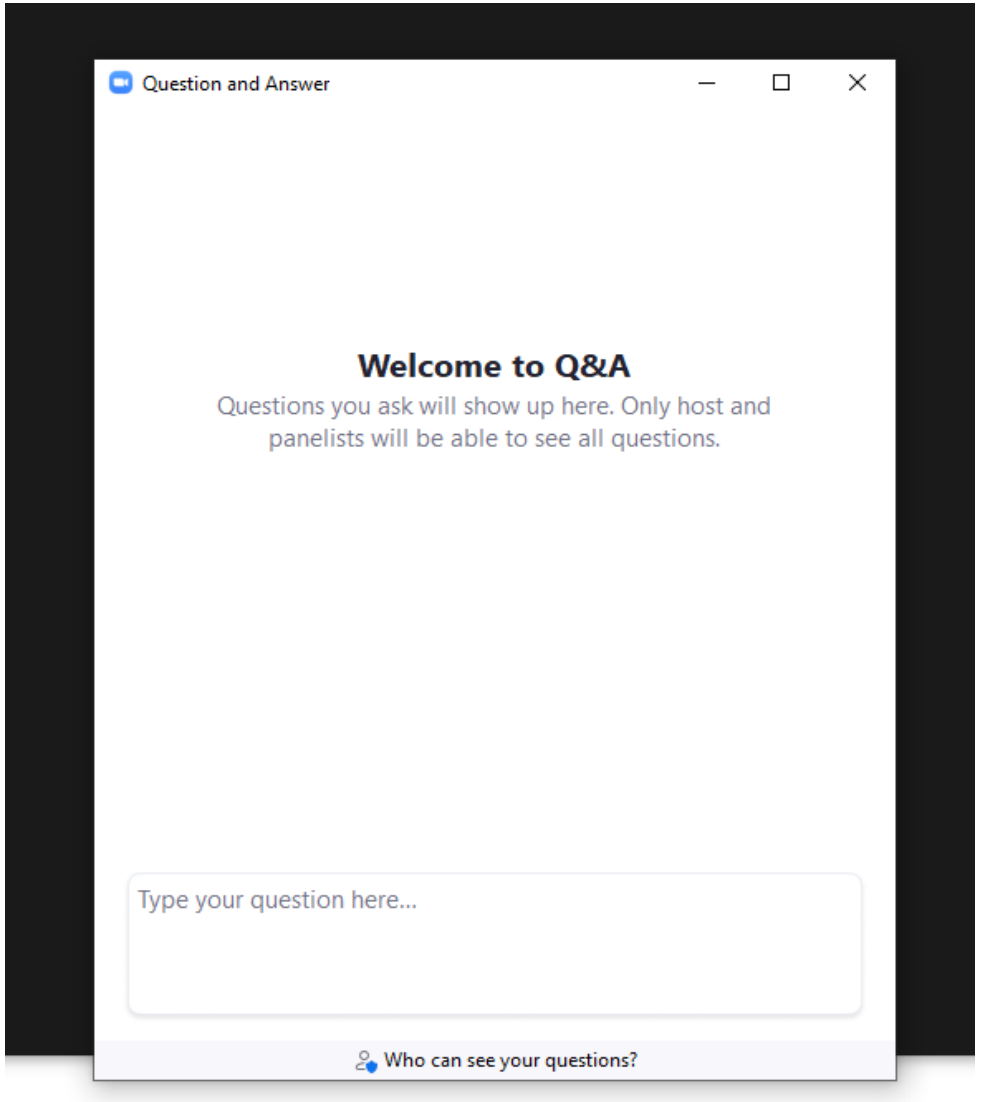




BLM

Meeting Panelists and Moderator

Mike Courtney
Bureau of Land Management
Twin Falls District
District Manager

Kasey Prestwich
Bureau of Land Management
Shoshone Field Office
Project Manager

Codie Martin
Bureau of Land Management
Shoshone Field Office
Field Manager

Heather Tiel-Nelson
Bureau of Land Management
Twin Falls District
Public Affairs Specialist

Ashley Long
Bureau of Land Management
Twin Falls District
District Renewable Energy
Archaeologist

Dave Freiberg
Bureau of Land Management
Shoshone Field Office
Outdoor Recreation Planner

Isaac Whitman
Bureau of Land Management
Shoshone Field Office
Rangeland Management Specialist

Jesse Rawson
Bureau of Land Management
Jarbidge Field Office
Wildlife Biologist

Jamie Young
SWCA
EIS Project Manager

Leyla Arsan
SWCA
EIS Project Manager

Meggan Dugan
SWCA
Wildlife Biologist

Chris Bockey
SWCA
Visual Resources Specialist

Scott Phillips
SWCA
Cultural Resources Specialist

Kayla Shockley
SWCA
Cultural Resources Specialist

Jo Render
Galileo Project, LLC
Meeting Moderator

Meeting Objectives

- Review the National Environmental Policy Act (NEPA) process and schedule
- Summarize elements and conclusions contained within the draft environmental impact statement (EIS) developed for the Lava Ridge Wind Project
- Respond to meeting participant questions about the NEPA process and draft EIS
- Provide participants with an opportunity for verbal comments
- Review how to provide written comments and continue participating in the NEPA process

What is an EIS?

An EIS is prepared to analyze and disclose effects of a proposed action on the environment, and to consider reasonable alternatives and mitigation measures.

August 20, 2021	BLM initiates public scoping
October 20, 2021	Scoping period ends
January 20, 2023	Draft EIS public comment period opens
March 21, 2023	Public comment period ends
Summer 2023	Final EIS released
Fall 2023	Record of Decision (ROD)

Lava Ridge Wind Project, February 2023

Purpose and Need

The BLM's purpose is to respond to Magic Valley Energy's application for a right-of-way (ROW) grant to construct, operate and maintain, and decommission a wind energy facility on public lands in compliance with the Federal Land Policy and Management Act (FLPMA), BLM ROW regulations, and other applicable federal laws and policies. The need for this action arises from FLPMA, which requires the BLM to manage public lands for multiple use and sustained yield and authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy (FLPMA Title V).

Lava Ridge Wind Project, February 2023

BLM

Agency Participation

Cooperating Agencies have:

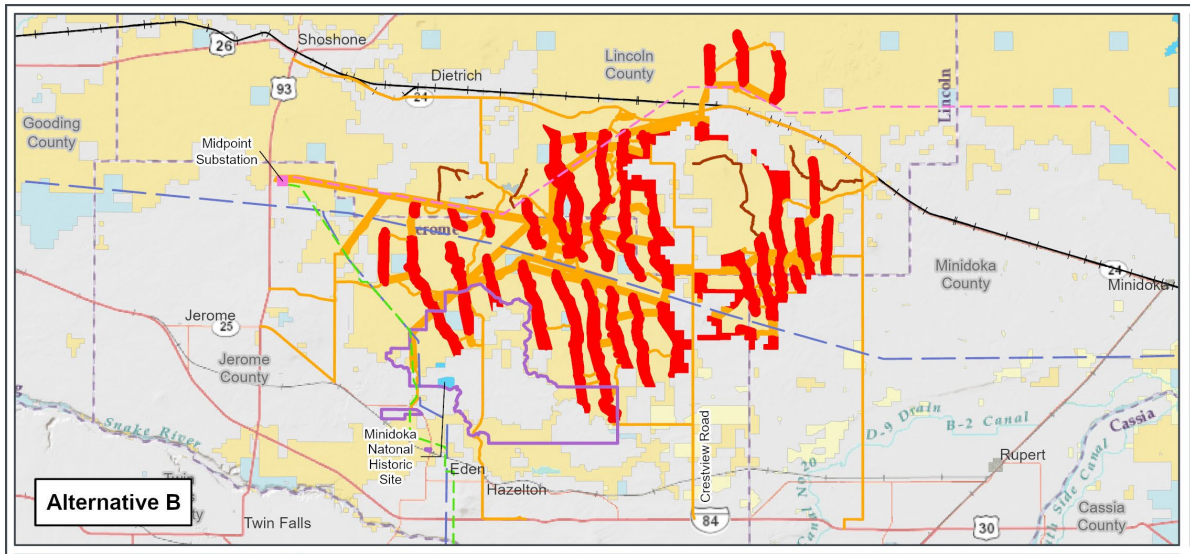
- Contributed staff to participate on the interdisciplinary team.
- Identified issues of concern regarding project impacts on the natural and human-made environment.
- Provided leadership, expertise, guidance, and review for the environmental analysis.

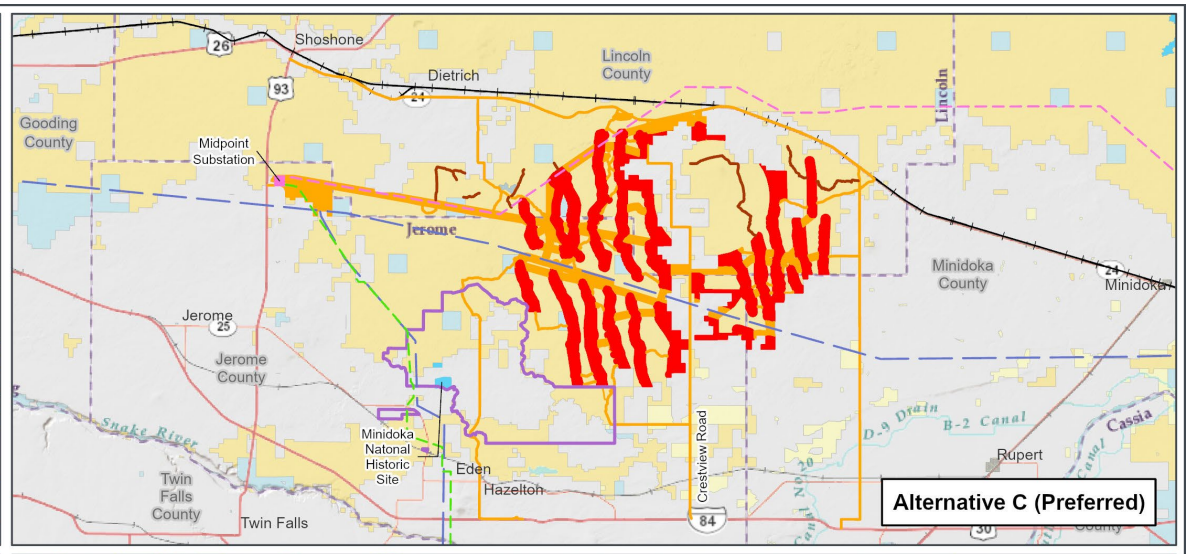
National Park Service
US Army Corps of Engineers
US Fish and Wildlife Service

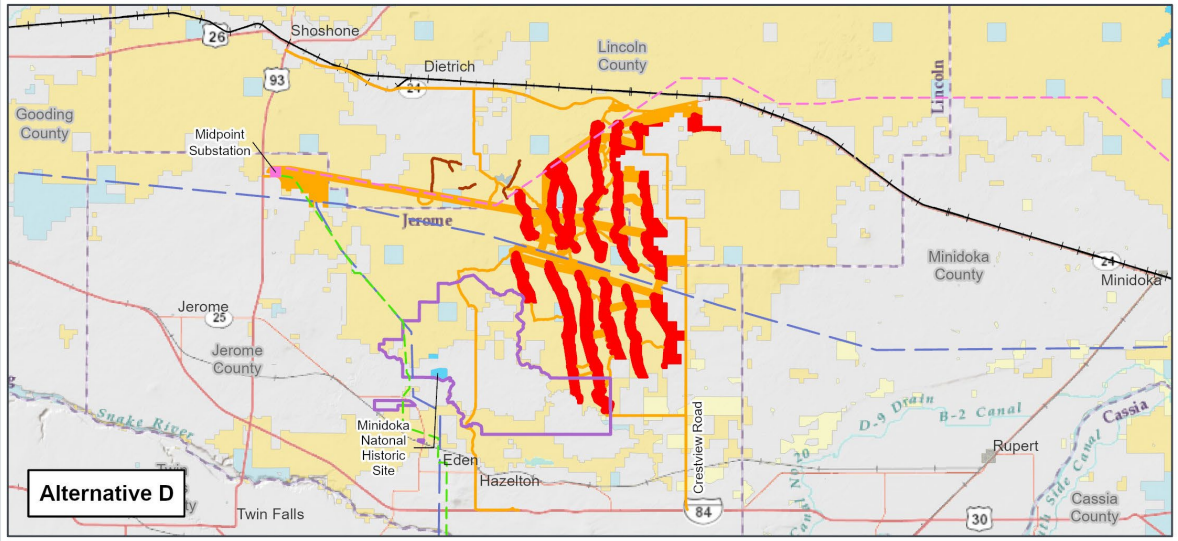
Idaho Department of Environmental Quality
Idaho Department of Fish and Game
Idaho Department of Lands
Idaho Office of Energy and Mineral Resources
Idaho Office of Species Conservation
Idaho State Department of Agriculture
Idaho State Historical Society

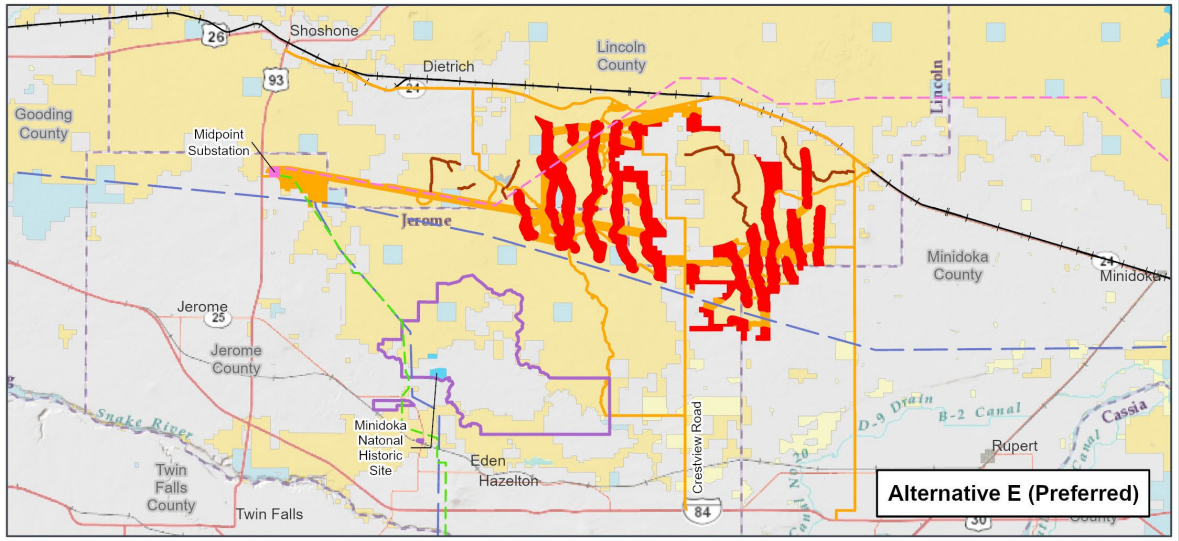
Jerome County
Lincoln County
Minidoka County

Alternatives Comparison









LAVA RIDGE WIND EIS

SWCA ENVIRONMENTAL CONSULTANTS

Siting Corridor
- Turbine
- Ancillary
- Range Improvement
- Midpoint Substation
- Kinport to Midpoint Transmission Line
- SWIP-North

- West-wide Energy Corridor
- Union Pacific Railroad
- Historic Minidoka War Relocation Center Boundary
- County Boundary

Landownership
- Bureau of Land Management
- U.S. Bureau of Reclamation
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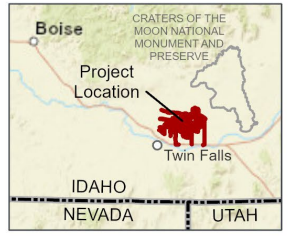

Jerome, Lincoln, and Minidoka Counties, Idaho

NAD 1983 Idaho TM

Base Map: Esri ArcGIS Online National Geographic World Map, accessed February 2023

Updated: 2/7/2023
Project No. 61005
61005_LRW_DEIS_PublicMeetings

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0 4 8 Miles
0 4.5 9 Kilometers

NATIONAL SYSTEM OF PUBLIC LANDS
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

BLM

Alternatives Comparison

Project Component	Alternative B (Proposed Action)	Alternative C [Preferred] (Reduced Western Corridors)	Alternative D (Centralized Corridors)	Alternative E [Preferred] (Reduced Southern Corridors)
General project area	197,474 acres	146,389 acres	110,315 acres	122,444 acres
Siting corridors	84,387 acres	64,367 acres	47,843 acres	49,833 acres
Wind turbines	Up to 400 3-MW turbines or up to 349 6-MW turbines	Up to 378 3-MW turbines or up to 259 6-MW turbines	Up to 280 3-MW turbines or up to 179 6-MW turbines	Up to 269 3-MW turbines or up to 194 6-MW turbines
Ground disturbance	9,114 acres total 2,374 acres infrastructure 6,740 acres work areas	6,953 acres total 1,811 acres infrastructure 5,142 acres work areas	4,838 acres total 1,124 acres infrastructure 3,714 acres work areas	5,136 acres total 1,402 acres infrastructure 3,734 acres work areas
Total project access roads	486 miles new 147 miles improved	360 miles new 117 miles improved	270 miles new 83 miles improved	272 miles new 101 miles improved
Vehicle traffic: trips per day	Construction: 1,103 average, range 11–2,032 Operation: 38 average, range 38– 134 Decommissioning: 1,270 average, range 13–1,830	Construction: 1,071 average, range 10–1,973 Operation: 37 average, range 37– 134 Decommissioning: 1,250 average, range 13–1,801	Construction: 863 average, range 8–1,590 Operation: 27 average, range 27–134 Decommissioning: 1,013 average, range 10–1,461	Construction: 836 average, range 8–1,541 Operation: 26 average, range 26– 134 Decommissioning: 983 average, range 10–1,417

Lava Ridge DEIS, February 2023

BLM

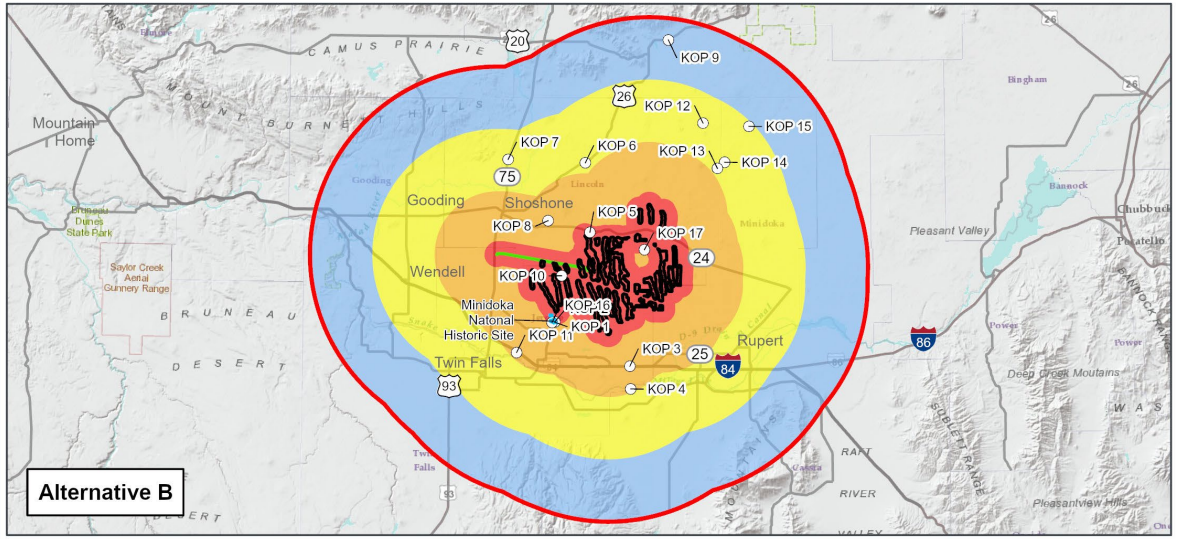
Alternatives Comparison

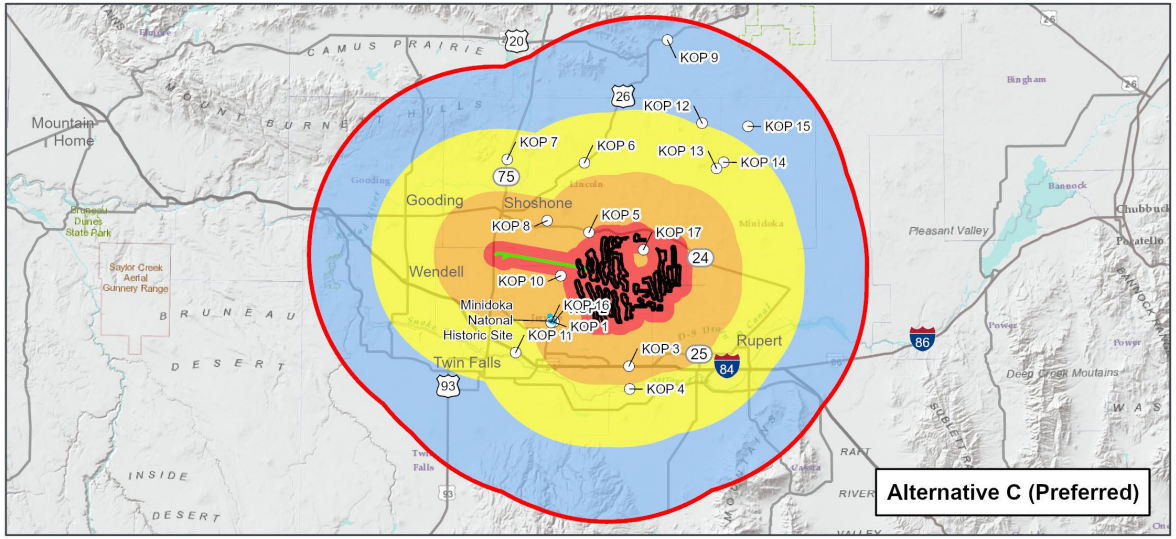
Project Component	Alternative B (Proposed Action)	Alternative C [Preferred] (Reduced Western Corridors)	Alternative D (Centralized Corridors)	Alternative E [Preferred] (Reduced Southern Corridors)
Water use	130,390,000 gallons total	126,210,000 gallons total	94,780,000 gallons total	91,840,000 gallons total
Livestock fencing	395 miles temporary	303 miles temporary	222 miles temporary	257 miles temporary
	(20%–25% of temporary fencing may be deployed at any given time during the 2 years of project construction and 2 years of decommissioning			
34.5-kV underground and overhead collector lines	248 miles total 56 miles underground 192 miles overhead	201 miles total 53 miles underground 148 miles overhead	150 miles total 39 miles underground 111 miles overhead	145 miles total 38 miles underground 107 miles overhead
230-kV and 500-kV transmission lines	53 miles	53 miles	40 miles	44 miles
Operation and maintenance facilities	3 facilities	3 facilities	3 facilities	3 facilities

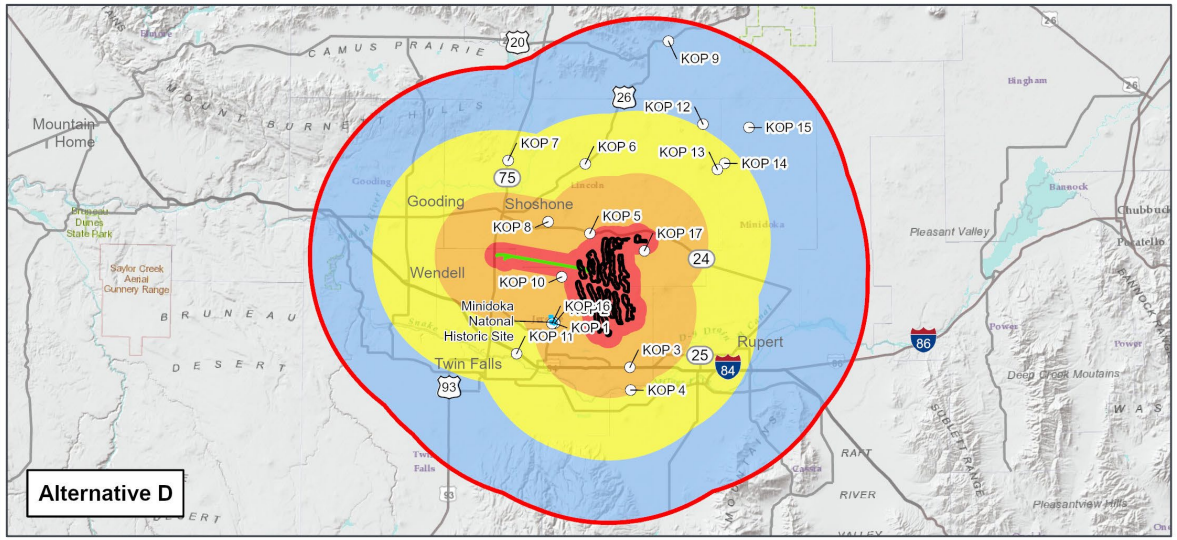
Lava Ridge DEIS, February 2023

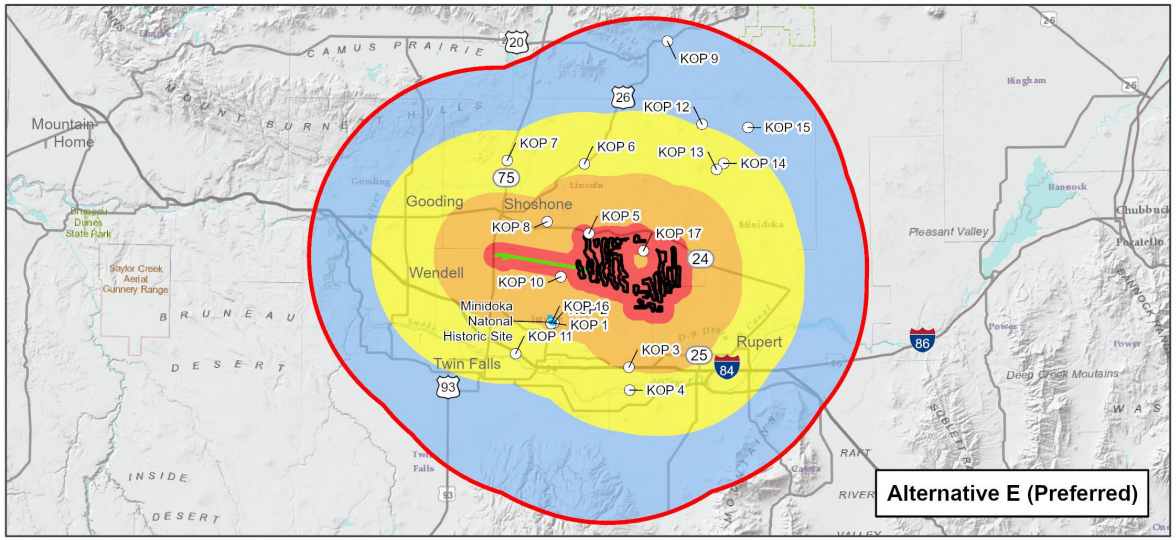
BLM

Key Observation Points (KOPs) and Distance Zones







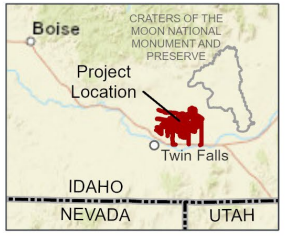


LAVA RIDGE WIND EIS

- Visual Resource Analysis Area
- Key Observation Point (KOP)
- Siting Corridor
- 500-kV Transmission Line
- Minidoka National Historic Site

Visual Resource Analysis Distance Zones

- Immediate Foreground 0–2 miles
- Foreground 2–10 miles
- Middleground 10–20 miles
- Background 20–30 miles
- Highway



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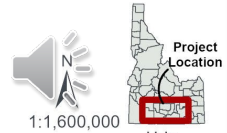

SWCA ENVIRONMENTAL CONSULTANTS

BLM

Visual Simulation for Alternating Distances from Idaho Highway 24 (KOP 5) With 3-MW and 6-MW Turbines

Lava Ridge Wind Project February 2023

BLM

Existing Condition for Minidoka National Historic Site Visitor Center (KOP 1)

Visual Simulation for Minidoka National Historic Site Visitor Center (KOP 1)
Alternative E with 6-MW Turbines

BLM

Existing Condition for Minidoka National Historic Site Block 22 Barracks (KOP 2)

Lava Ridge Wind Project February 2023

Visual Simulation for Minidoka National Historic Site Block 22 Barracks (KOP 2)
Alternative C: Morning with 6-MW Turbines

Lava Ridge Wind Project February 2023

BLM

Existing Condition for Minidoka National Historic Site Block 22 Barracks (KOP 2)

Visual Simulation for Minidoka National Historic Site Block 22 Barracks (KOP 2)
Alternative C: Afternoon with 6-MW Turbines

Existing Condition for Sid Butte (KOP 17)

Visual Simulation for Sid Butte (KOP 17)
Alternative E with 6-MW Turbines

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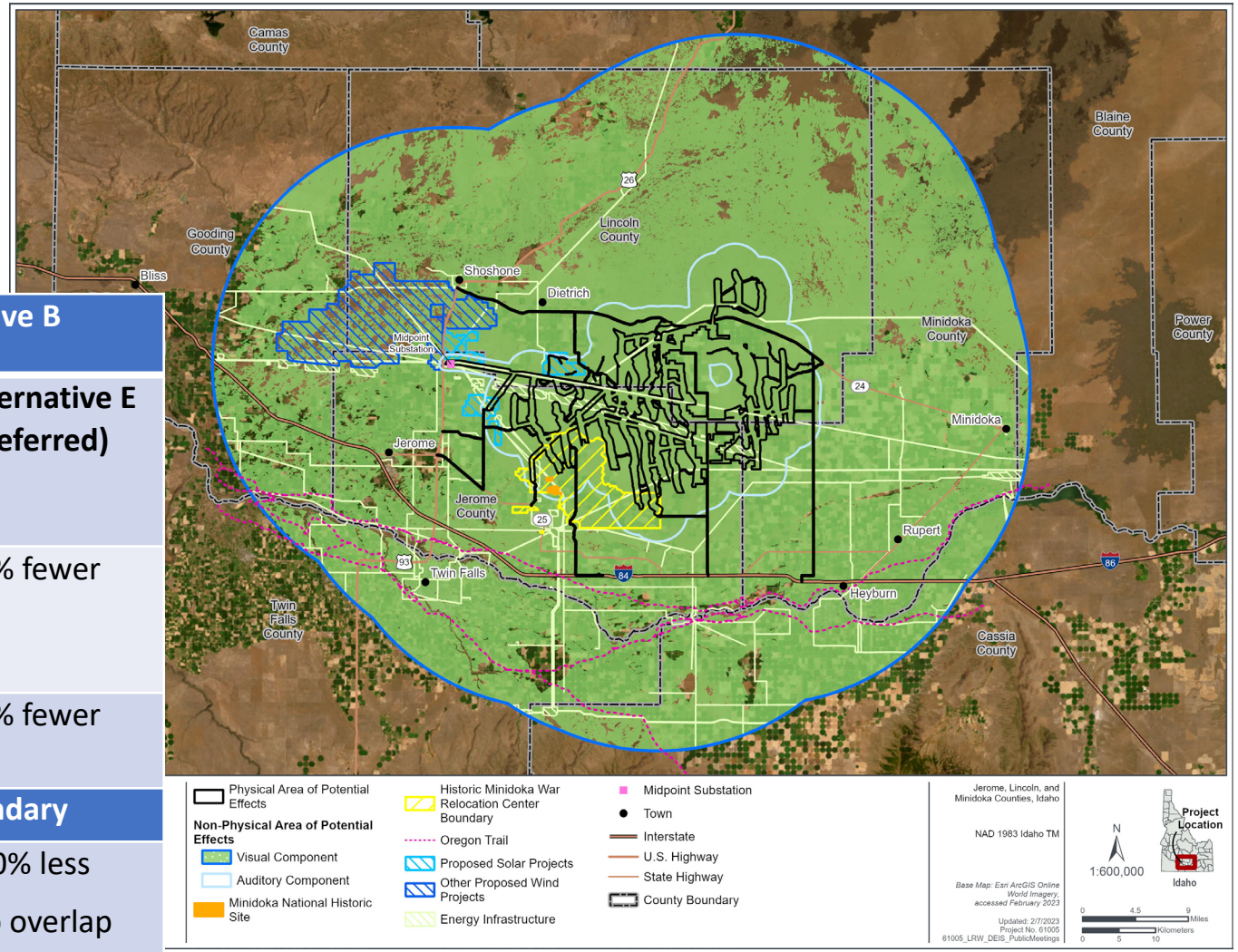
Visual or Auditory Impacts to Cultural Resources

Visual or auditory (non-physical) impacts to potentially susceptible cultural resources from turbines and 500-kV transmission lines would occur. Not all visual or auditory impacts can be avoided or minimized to avoid adverse effects. These impacts could affect setting, feeling, and association that may also result in disturbance of the resources' existing solitude and surroundings.

		Percent Difference from Alternative B		
	Alternative B	**Alternative C (Preferred)**	**Alternative D**	**Alternative E (Preferred)**
Visual Component	12,748 estimated resources	14% fewer	23% fewer	19% fewer
Auditory Component	361 estimated resources	29% fewer	47% fewer	40% fewer
Auditory Component Overlap of the Historic Minidoka WRC Boundary				
	41 square miles (also fully overlaps Minidoka NHS)	65% less (no overlap with NHS)	57% less (no overlap with NHS)	100% less (no overlap with NHS)



The majority of known cultural resources susceptible to visual impacts (approximately 80%) occur 10-20 miles from the project.

BLM

Physical Impacts to Cultural Resources

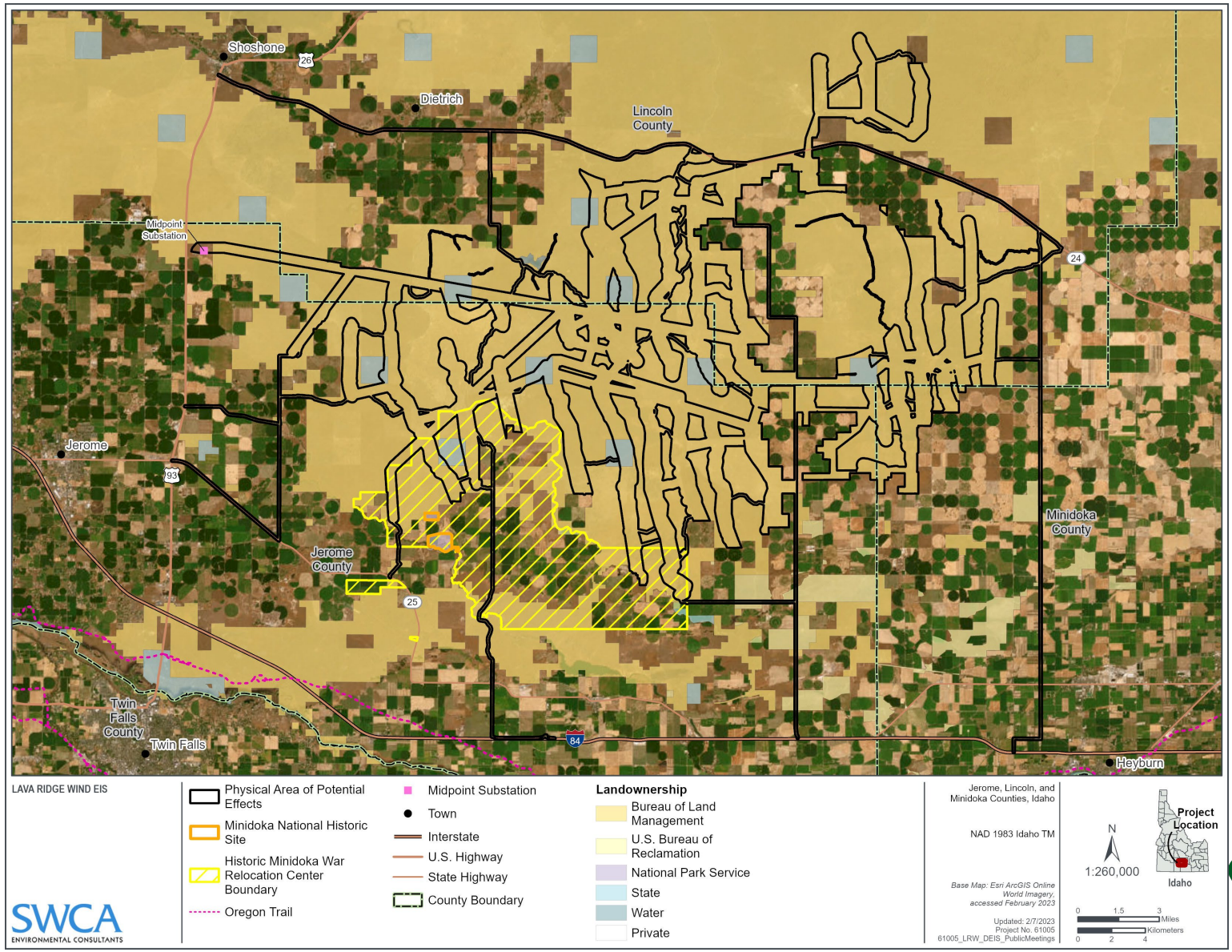
Ground disturbance has the potential to physically impact cultural resources in the project's physical area of potential effects (APE), including within the historic Minidoka War Relocation Center (WRC) boundary.

Alternative B
- 43 estimated resources in 14 square miles of ground disturbance
- 8 square miles of siting corridor overlap with Minidoka WRC

Alternative C
- 24% fewer estimated resources
- 86% less overlap with Minidoka WRC

Alternative D
- 47% fewer estimated resources
- 63% less overlap with Minidoka WRC

Alternative E
- 44% fewer estimated resources
- 97% less overlap with Minidoka WRC



BLM

Environmental Justice Communities

EO 12898 mandates consideration of environmental justice (EJ) issues: the fair treatment and meaningful involvement of all potentially affected people, regardless of race, color, national origin, or income.

Environmental justice populations: minority or low income, including geographically dispersed EJ populations who value this landscape for its viewshed and soundscape

Minority or Low Income:

- About half of all census tracts and block groups within the analysis area were identified as a low-income population, minority population, or both

Japanese American Community:

- the Minidoka National Historic Site is an international site of conscience; the historic Minidoka War Relocation Center has a larger 34k-acre historic boundary
- the landscape character and setting are key components of the visitor and survivor experience of remoteness, isolation, and abandonment, needed to engage in reflection, remembrance, and healing

Native American Tribes:

- the area is a cultural landscape supporting traditional uses and tribal treaty rights

Minidoka War Relocation Authority Center, 1942
Photo Credit: Francis Stewart

Engagement with Environmental Justice Communities

EO 12898 directs the BLM to evaluate how the project may affect environmental justice communities, including the places they live or locations they consider culturally-significant.

The BLM has worked to meaningfully engage with these environmental justice communities through in-person and virtual meetings, including National Historic Preservation Act Section 106 consultation meetings:

- Japanese American community
- the Shoshone-Bannock Tribes of the Fort Hall Indian Reservation (Shoshone-Bannock Tribes)
- the Shoshone-Paiute Tribes of the Duck Valley Indian Reservation (Shoshone-Paiute Tribes)

The Tribes and BLM have also been discussing the project in Government-to-Government meetings.

Minidoka National Historic Site Guard Tower
Photo Credit: National Park Service

Conclusion: Disproportionate high and adverse impacts to the Japanese American Community and Native American Tribes from changes to setting, feeling, and experience due to visual and noise impacts.

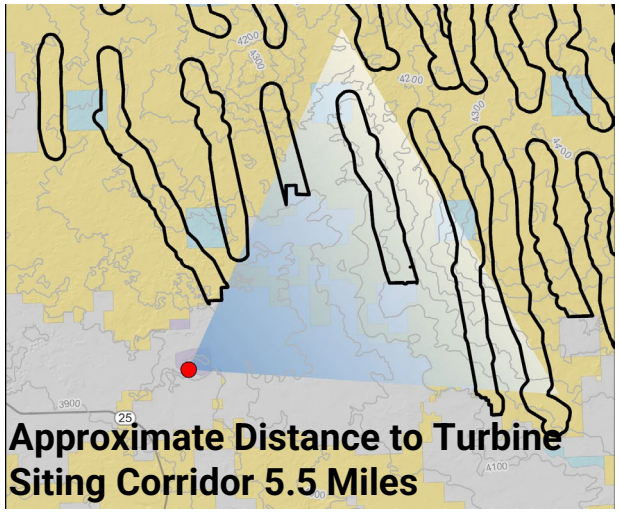
Cultural Resource Concerns of the Japanese American Community

The Minidoka NHS is a nationally significant historic site and provides stories of the individuals incarcerated there. The BLM is treating Minidoka WRC as a Traditional Cultural Property. These sites provide important civil rights lessons. The Japanese American community considers Minidoka NHS and War Relocation Center to be sacred and important places where learning and healing can be achieved through continued historic preservation.

Concerns include the following:

- honoring the place of Japanese Americans in national history;
- maintaining the wide open vistas, as would have been experienced during incarceration;
- prominent project structures and lighting visually impacting Minidoka NHS and WRC;
- siting the project in proximity to the Minidoka NHS and WRC, given Japanese American community sensitivities to development-related impacts in the surrounding area;
- disproportionate impacts to Japanese American historic sites.

Conclusion: The Japanese American community would consider the visual and emotional impact of the project on their experience of Minidoka NHS and WRC to be culturally and spiritually impactful.



Cultural Resource Concerns of Native American Tribes

Concerns include potential impacts to the following:

- a resource's setting, feeling, or association from a Tribal perspective;
- the views from Wilson Butte Cave (a nationally significant historic site) and other buttes and landforms;
- traditional resources for practices such as hunting and gathering;
- dark skies that support Tribal practices;
- vegetation and wildlife that Tribes hold spiritually and culturally significant, including wildlife habitats and corridors and migratory birds;
- Tribal treaty rights in the area;
- broader areas to which Tribes ascribe cultural significance.

Conclusion: Tribes would consider the presence of the project on the landscape to be culturally and spiritually impactful.

Draft Cultural Resources Programmatic Agreement (PA)

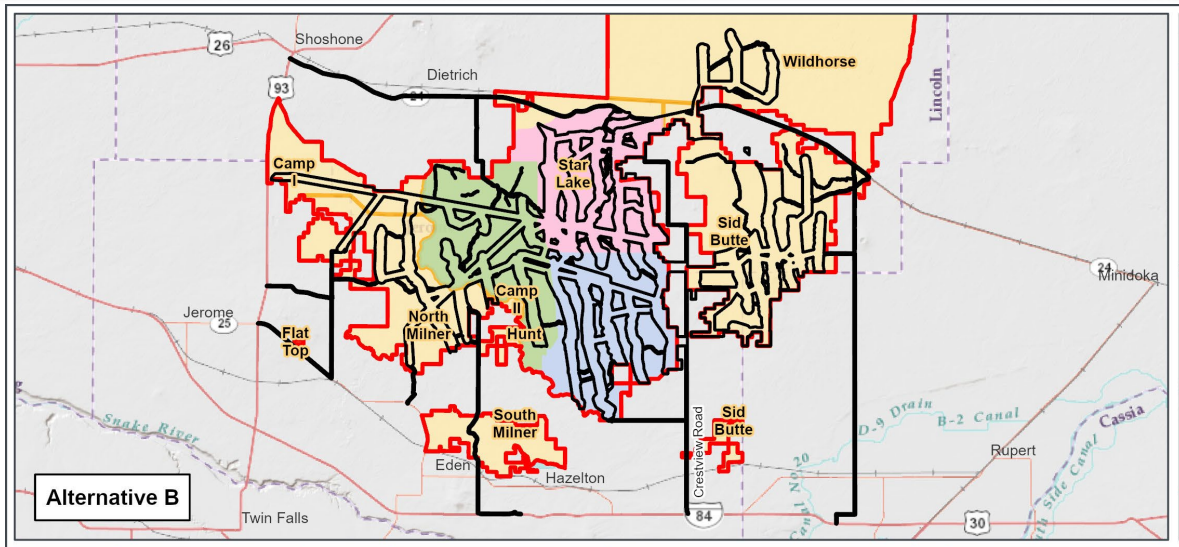
To comply with Section 106 of the National Historic Preservation Act (NHPA), the draft PA defines:

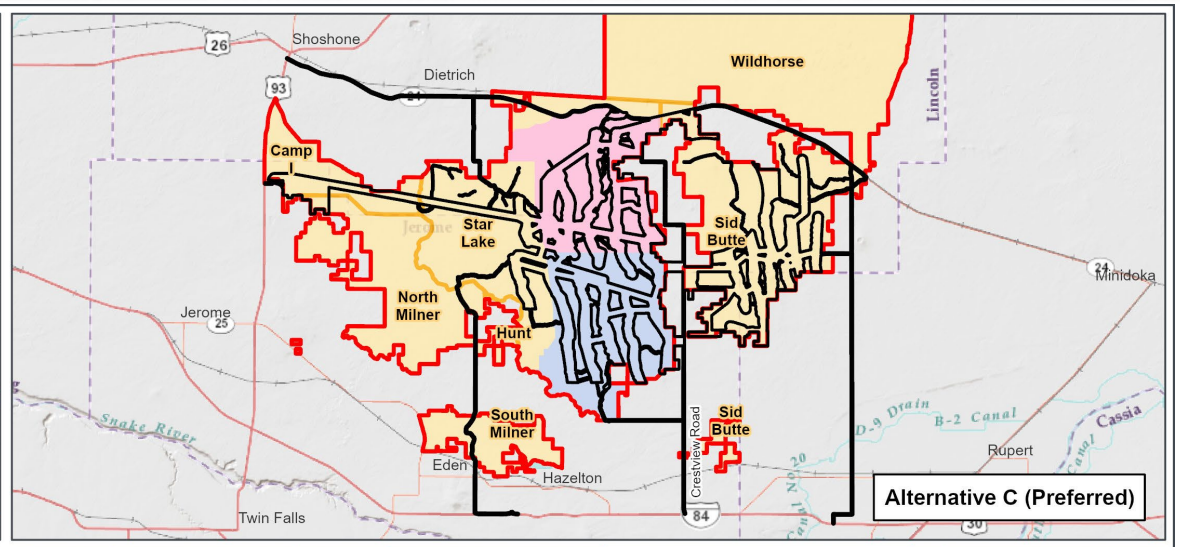
- the inventory and evaluation methods that will be implemented prior to project construction;
- further measures to avoid, minimize, or mitigate effects to cultural resources; with development of an Historic Properties Management Plan (HPMP) and Historic Properties Treatment Plans (HPTPs);
- development of a monitoring and discovery plan to address previously-unidentified cultural resources, if found during ground-disturbing activities.

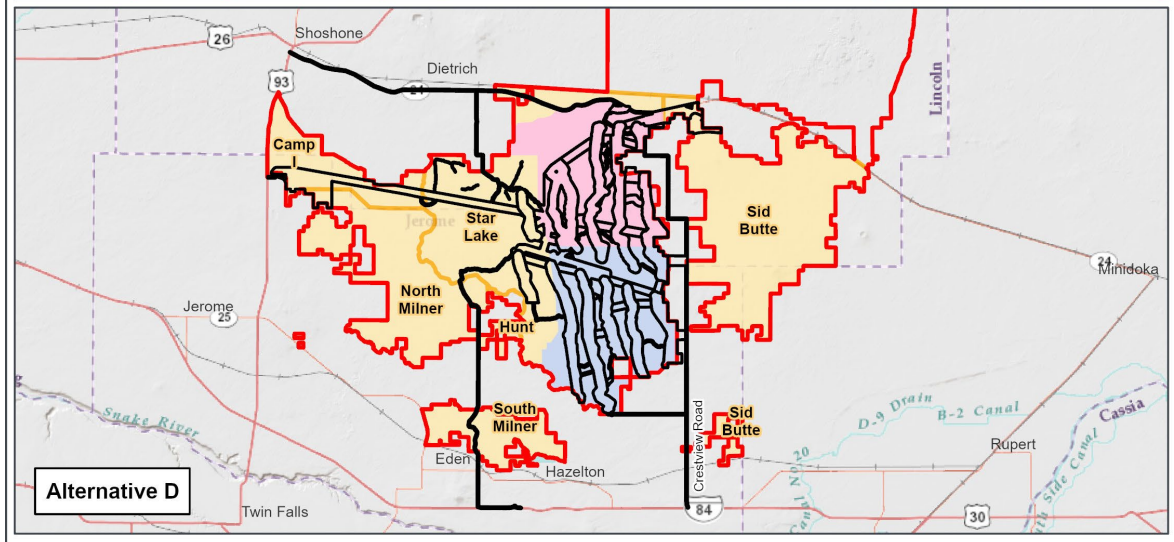
The BLM is seeking your input and written comment on the draft PA developed to comply with Section 106 of the NHPA. The draft PA was prepared in coordination with consulting parties and is included as Appendix 8 in the draft EIS. You may provide written comments on the draft PA or cultural resources and historic properties potentially affected by the Lava Ridge Wind Project.

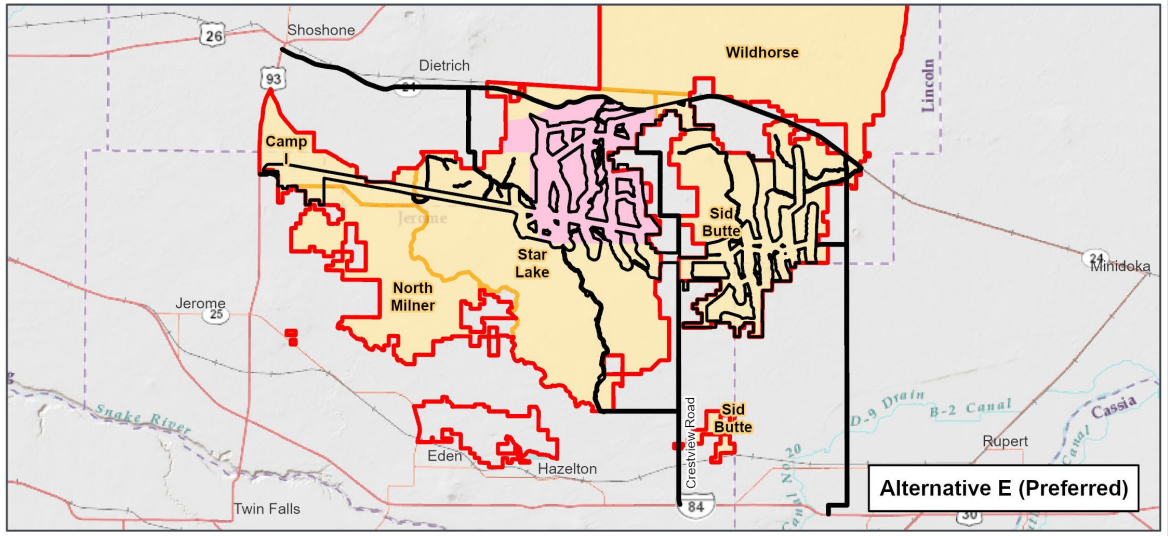
If you are interested in sharing information on these resources or have questions about the Section 106 process, please contact: **Shoshone Field Office,** email: BLM_ID_LavaRidge@blm.gov, phone: 208-732-7200.

Livestock Grazing and Affected Allotments







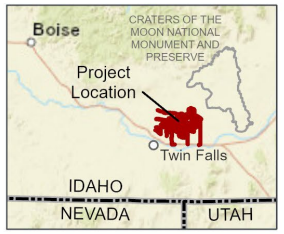


LAVA RIDGE WIND EIS

- Livestock Grazing Analysis Area
- Siting Corridor
- Affected Allotment
- County Boundary

Star Lake Allotment Subphase

- North Subphase
- South Subphase
- West Subphase

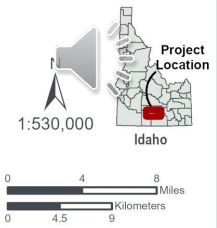


Jerome, Lincoln, and Minidoka Counties, Idaho

NAD 1983 Idaho TM

Base Map: Esri ArcGIS Online National Geographic World Map, accessed February 2023

Updated: 2/7/2023
Project No. 61005
61005_LRW_DEIS_PublicMeetings



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Livestock Grazing and Affected Allotments

- Project vegetation disturbance, infrastructure, and temporary fencing would result in affected allotment acreage and reduced forage availability.
- All action alternatives would include measures that ensure coordination between MVE and permittees and would allow for livestock grazing to continue throughout the project phases.
- Range improvements, such as fencing, watering, and cattle guards, would be installed to disperse livestock away from project activities.

Maximum Percent Allotment Acreage Affected during Construction and Decommissioning

Allotment Name*	Alternative B Acres Unavailable (% Allotment)	Alternative C (Preferred) Acres Unavailable (% Allotment)	Alternative D Acres Unavailable (% Allotment)	Alternative E (Preferred) Acres Unavailable (% Allotment)
Camp I	271 (2.2%)	319 (2.7%)	319 (2.7%)	319 (2.7%)
North Milner	839 (3.0%)	80 (0.3%)	80 (0.3%)	67 (0.2%)
Sid Butte	15,548 (34.9%)	15,548 (34.9%)	1,579 (3.5%)	15,548 (34.9%)
Star Lake	4,916 (5.0%)	4,039 (4.1%)	4, 163 (4.2%)	2,479 (2.5%)
Wildhorse	452 (0.2%)	4 (< 0.1%)	0 (0%)	4 (< 0.1%)

* The maximum affected acreage in the Camp II, Flat Top, Hunt, and South Milner allotments is less than 15 acres per allotment.

The maximum percent allotment acreage affected during operation and final reclamation ranges from <0.1% to 1.3%, depending on the allotment and the alternative.

Mule Deer and Pronghorn Habitats and Populations

- The project is within winter range for mule deer and pronghorn.
- The Owinza migration route for pronghorn bisects the siting corridors; stopover areas have been identified in the southern portion of the project, as well as just north of the project.
- Wintering mule deer and pronghorn already experience high energy demands and increased mortality rates; development pressure in winter habitat could increase stress and avoidance behavior of areas of new development, indirectly reduce available habitat, and increase energy losses and mortality.
- IDFG studies to further refine mapped routes and stopover areas of mule deer and pronghorn and identify other currently unmapped routes and stopover areas are ongoing.
- MVE would be required to minimize disturbance in big game winter range (assumed to be the entirety of the siting corridors) during all project phases. This may include implementing a phased approach for construction, maintenance, and decommissioning to minimize intrusion on the winter and migration seasons.
- Adaptive management, such as supporting and using IDFG telemetry studies, would be implemented to reduce impacts and focus mitigation efforts as needed.

Conclusion: All alternatives may displace mule deer and pronghorn from important winter habitats. Alternatives C, D, and E would result in fewer affected mule deer and pronghorn habitats because there would be fewer siting corridors in observed winter range and migration routes.

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Birds and Bats

- Bird and bat fatalities are expected due to collisions with turbines.

Indicator	Alternative B	Alternative C (Preferred)	Alternative D	Alternative E (Preferred)
Estimated bird fatalities per year from turbine collisions (operation only, 30 years)	Mean: All species: 3,240–5,654 birds Diurnal raptors only: 156–272 birds Eagles only: 416 birds Maximum: All species: 10,200–17,799 birds Diurnal raptors only: 348–607 birds	Mean: All species: 3,062–4,196 birds Diurnal raptors only: 147–202 birds Eagles only: 341 birds Maximum: All species: 9,639–13,209 birds Diurnal raptors only: 328–451 birds	Mean: All species: 2,268–2,900 birds Diurnal raptors only: 109–140 birds Eagles only: 237 birds Maximum: All species: 7,140–9,129 birds Diurnal raptors only: 244–311 birds	Mean: All species: 2,179–3,143 birds Diurnal raptors only: 105–151 birds Eagles only: 233 birds Maximum: All species: 6,860–9,894 birds Diurnal raptors only: 234–338 birds

Diurnal: active during the day

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Birds and Bats

- Adaptive management, including curtailment, would be implemented to reduce fatalities. Monitoring would evaluate the effectiveness of adaptive management and determine if compensatory mitigation is needed.
- See the Bird and Bat Conservation Strategy and the Eagle Conservation Plan in MVE's POD for more details.

Indicator	Alternative B	Alternative C (Preferred)	Alternative D	Alternative E (Preferred)
Estimated bat fatalities per year from turbine collisions (operation only, 30 years)	Mean: 1,800–3,141 bats Maximum: 8,880–15,496 bats	Mean: 1,733–2,331 bats Maximum: 8,547–11,500 bats	Mean: 1,256–1,611 bats Maximum: 6,194–7,948 bats	Mean: 1,210–1,746 bats Maximum: 5,972–8,614 bats

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Greater Sage-grouse and Sagebrush Habitat

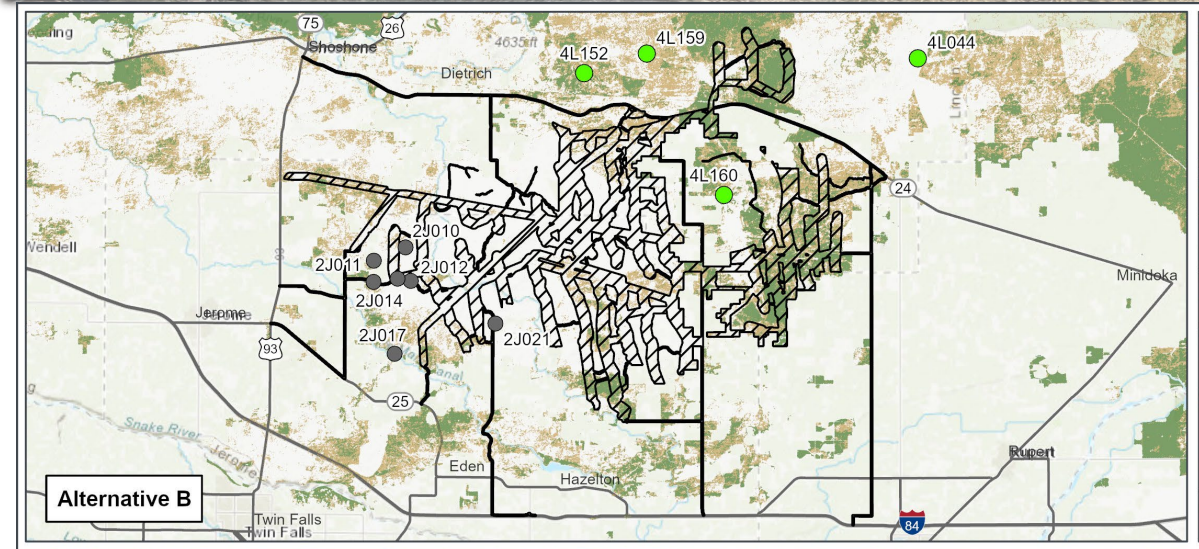
The project would disturb greater sage-grouse habitat and add infrastructure that could change the way greater sage-grouse use those habitats.

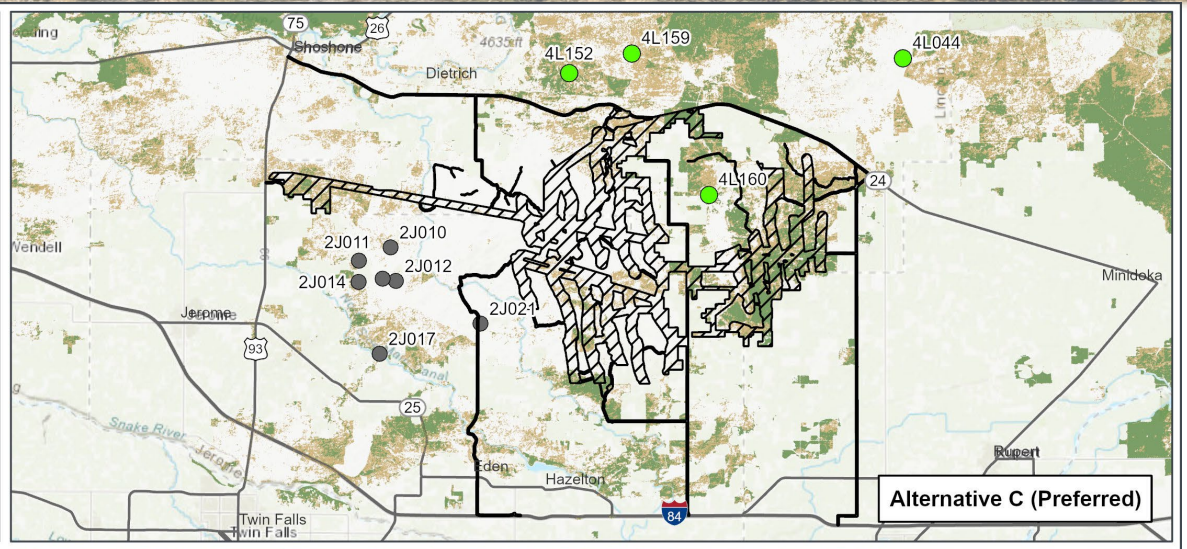
Any action alternative would meet the BLM's required net conservation gain standard. This would be determined by the BLM in coordination with the IDFG and informed by the IDFG's habitat quantification tool (HQT).

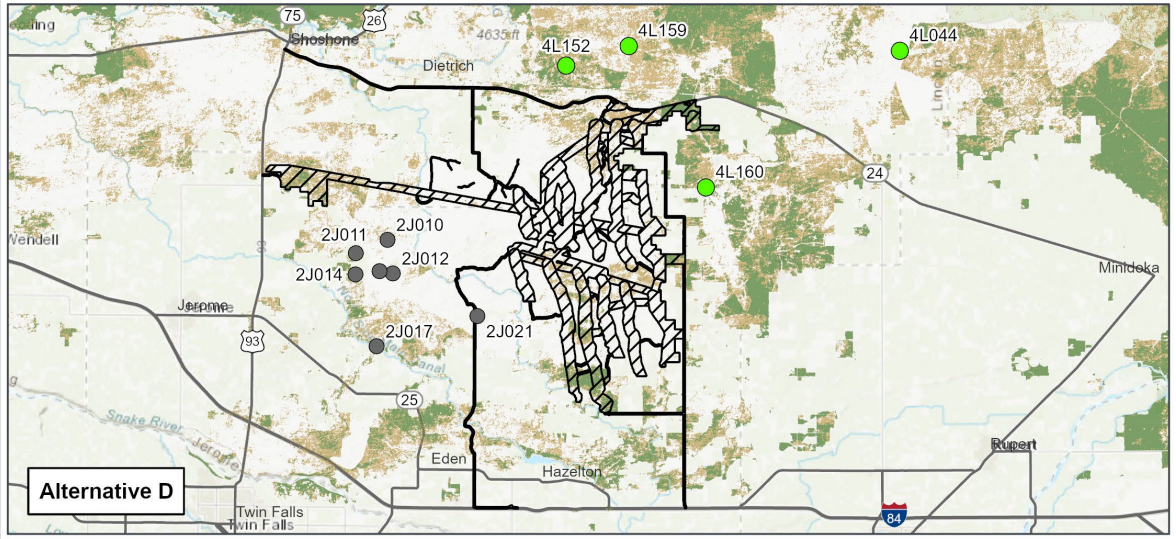
Indicator	Alternative B	Alternative C (Preferred)	Alternative D	Alternative E (Preferred)
Acres of ground disturbance in sagebrush habitat with > 10% cover†	940 acres work areas 331 acres infrastructure areas	724 acres work areas 255 acres infrastructure areas	298 acres work areas 90 acres infrastructure areas	625 acres work areas 235 acres infrastructure areas
Acres of ground disturbance in General Habitat Management Areas	6,145 acres work areas 2,161 acres infrastructure areas	4,611 acres work areas 1,621 acres infrastructure areas	3,386 acres work areas 1,026 acres infrastructure areas	3,306 acres work areas 1,240 acres infrastructure areas
Acres of functional habitat loss* from HQT analysis	806.8 acres	553.4 acres	75.3 acres	559.6 acres

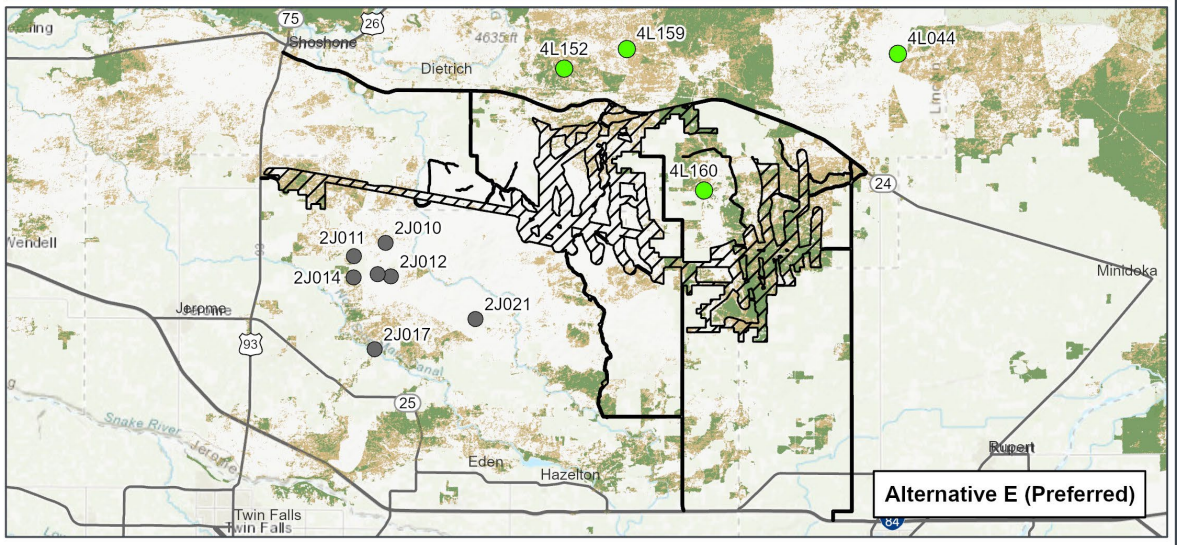
†Data from Xian et al. (2015).

Greater Sage-grouse and Sagebrush Habitat









LAVA RIDGE WIND EIS

Siting Corridor

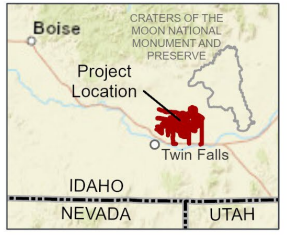
Highway

Sage-grouse Lek

- Occupied
- Unknown

Sagebrush Habitat

- 5-10% sagebrush cover
- > 10% sagebrush cover



Jerome, Lincoln, and Minidoka Counties, Idaho

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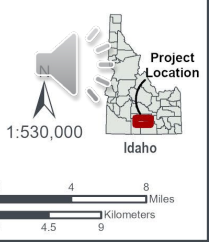

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Additional Analyses in the Draft EIS

- Air quality
- Climate and greenhouse gas (GHG) emissions
- Socioeconomics
- Fire and fuels management
- Land use and realty
- Paleontological resources
- Pollinators
- St. Anthony sand dune tiger beetle
- Monarch butterfly
- BLM special-status bumble bees
- Recreation
- Native upland vegetation communities
- Transportation

- Amphibians
- Pygmy rabbit
- Soils
- BLM special-status plants
- Water and wetland resources
- Wildlife movement

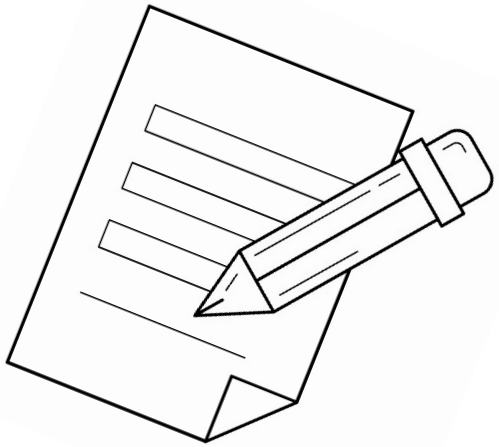
How to Submit Comments

Online: The preferred way to comment is through the BLM's ePlanning project site at https://bit.ly/3EirzxD. Click on the "Participate Now" button to the left of the document link. Enter your comment and information then click "Submit."

Email: BLM_ID_LavaRidge@blm.gov

Mail: Delivered by hand or U.S. mail enclosed in an envelope labeled "Lava Ridge Wind Project EIS," to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352

Public meetings: A court reporter will be available to record verbal comments during public meetings. Comment forms will also be available during in-person meetings.



Comments should be submitted by the end of the comment period March 21, 2023

For More Information

BLM

For more information or if you have further questions contact:

Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager
Phone: 208-732-7204
Email: kprestwich@blm.gov

For project updates: https://bit.ly/3EirzxD

To sign up for the mailing list: forms.office.com/r/NDsr6rhtbs

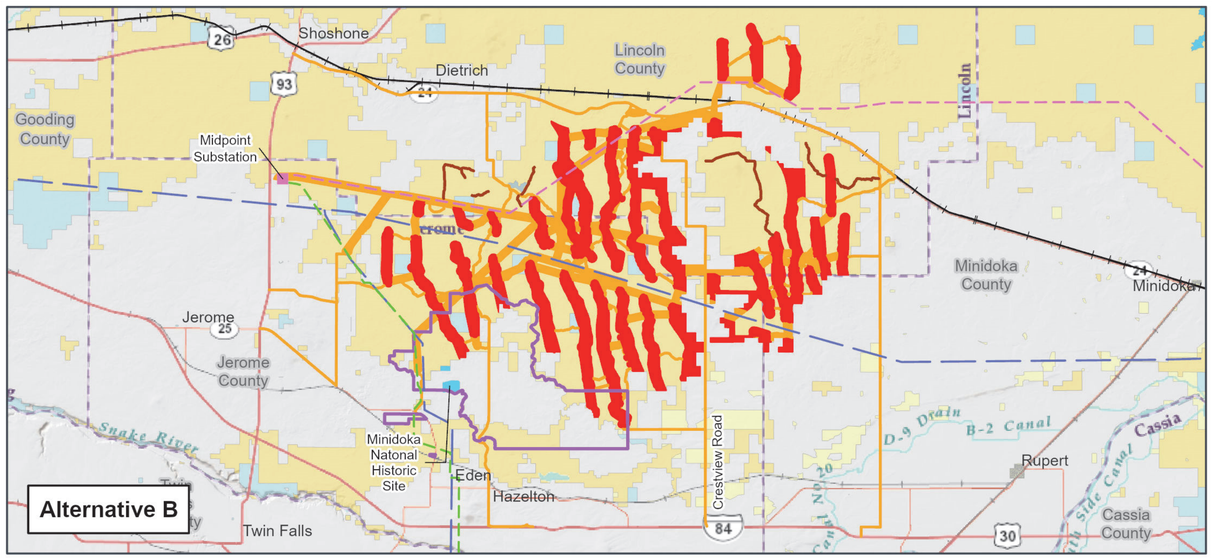
Please include your name and all relevant contact information when you complete the form

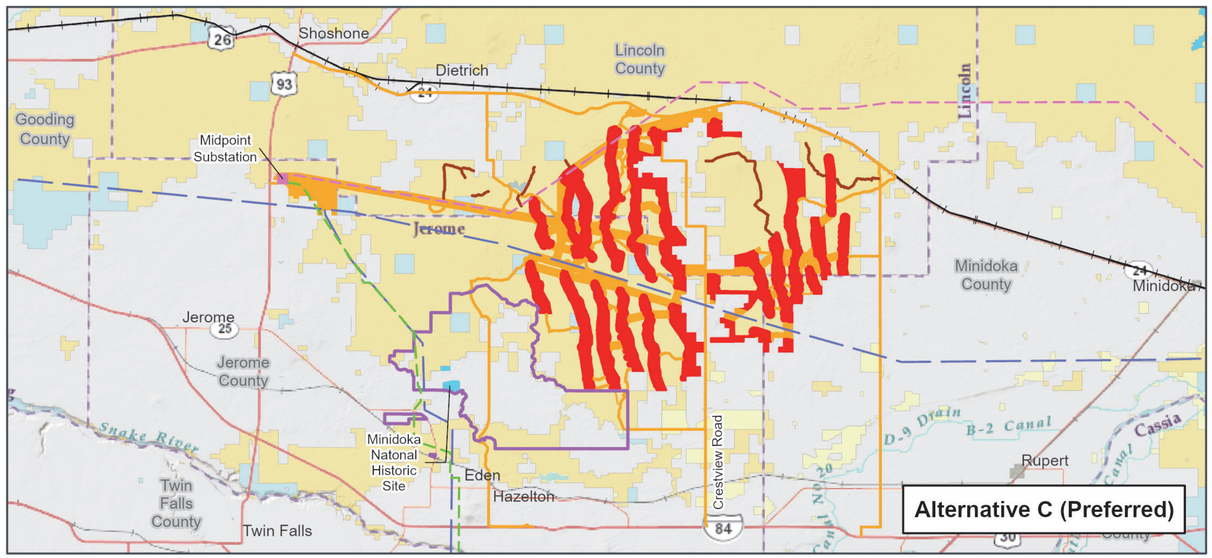
We have set aside some time to answer questions. If your questions do not get answered, please direct them to kprestwich@blm.gov

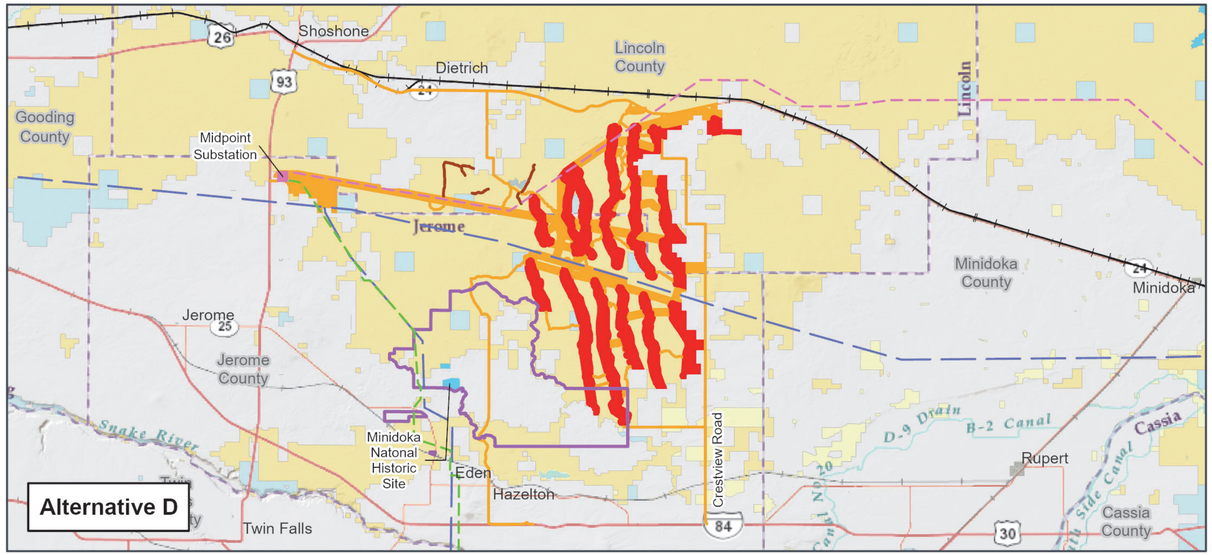
APPENDIX F

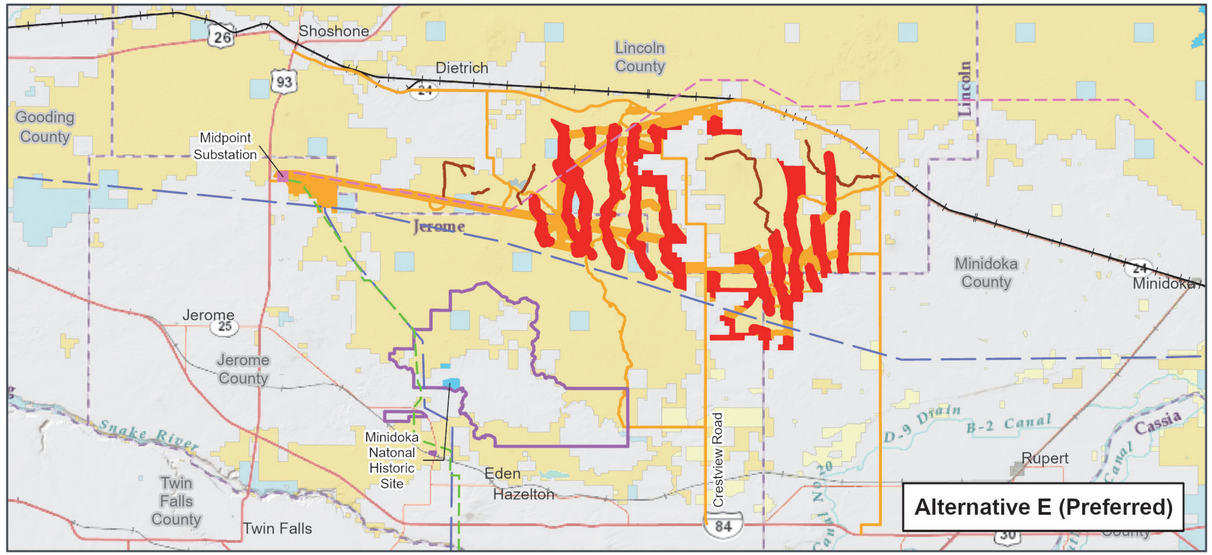
Public Meeting Posters

Alternatives Comparison









LAVA RIDGE WIND EIS

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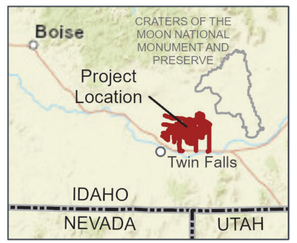
Siting Corridor
- Turbine
- Ancillary
- Range Improvement
- Midpoint Substation
- Kinport to Midpoint Transmission Line
- SWIP-North

- West-wide Energy Corridor
- Union Pacific Railroad
- Historic Minidoka War Relocation Center Boundary
- County Boundary

Landownership
- Bureau of Land Management
- U.S. Bureau of Reclamation
- National Park Service
- State
- Water
- Private



Jerome, Lincoln, and Minidoka Counties, Idaho

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61005_LRW_DEIS_PublicMeetings

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0 4 8 Miles
0 4.5 9 Kilometers

BLM

Alternatives Comparison

Project Component	Alternative B (Proposed Action)	Alternative C [Preferred] (Reduced Western Corridors)	Alternative D (Centralized Corridors)	Alternative E [Preferred] (Reduced Southern Corridors)
General project area	197,474 acres	146,389 acres	110,315 acres	122,444 acres
Siting corridors	84,387 acres	64,367 acres	47,843 acres	49,833 acres
Wind turbines	Up to 400 3-MW turbines or up to 349 6-MW turbines	Up to 378 3-MW turbines or up to 259 6-MW turbines	Up to 280 3-MW turbines or up to 179 6-MW turbines	Up to 269 3-MW turbines or up to 194 6-MW turbines
Ground disturbance	9,114 acres total 2,374 acres infrastructure 6,740 acres work areas	6,953 acres total 1,811 acres infrastructure 5,142 acres work areas	4,838 acres total 1,124 acres infrastructure 3,714 acres work areas	5,136 acres total 1,402 acres infrastructure 3,734 acres work areas
Total project access roads	486 miles new 147 miles improved	360 miles new 117 miles improved	270 miles new 83 miles improved	272 miles new 101 miles improved
Vehicle traffic: trips per day	Construction: 1,103 average, range 11–2,032 Operation: 38 average, range 38– 134 Decommissioning: 1,270 average, range 13–1,830	Construction: 1,071 average, range 10–1,973 Operation: 37 average, range 37– 134 Decommissioning: 1,250 average, range 13–1,801	Construction: 863 average, range 8–1,590 Operation: 27 average, range 27–134 Decommissioning: 1,013 average, range 10–1,461	Construction: 836 average, range 8–1,541 Operation: 26 average, range 26– 134 Decommissioning: 983 average, range 10–1,417
Water use	130,390,000 gallons total	126,210,000 gallons total	94,780,000 gallons total	91,840,000 gallons total
Livestock fencing	395 miles temporary	303 miles temporary	222 miles temporary	257 miles temporary
	(20%–25% of temporary fencing may be deployed at any given time; 2 years construction, 2 years decommissioning)			
34.5-kV underground and overhead collector lines	248 miles total 56 miles underground 192 miles overhead	201 miles total 53 miles underground 148 miles overhead	150 miles total 39 miles underground 111 miles overhead	145 miles total 38 miles underground 107 miles overhead
230-kV and 500-kV transmission lines	53 miles	53 miles	40 miles	44 miles
Operation and maintenance facilities	3 facilities	3 facilities	3 facilities	3 facilities

Lava Ridge Wind Project Draft Environmental Impact Statement, February 2023

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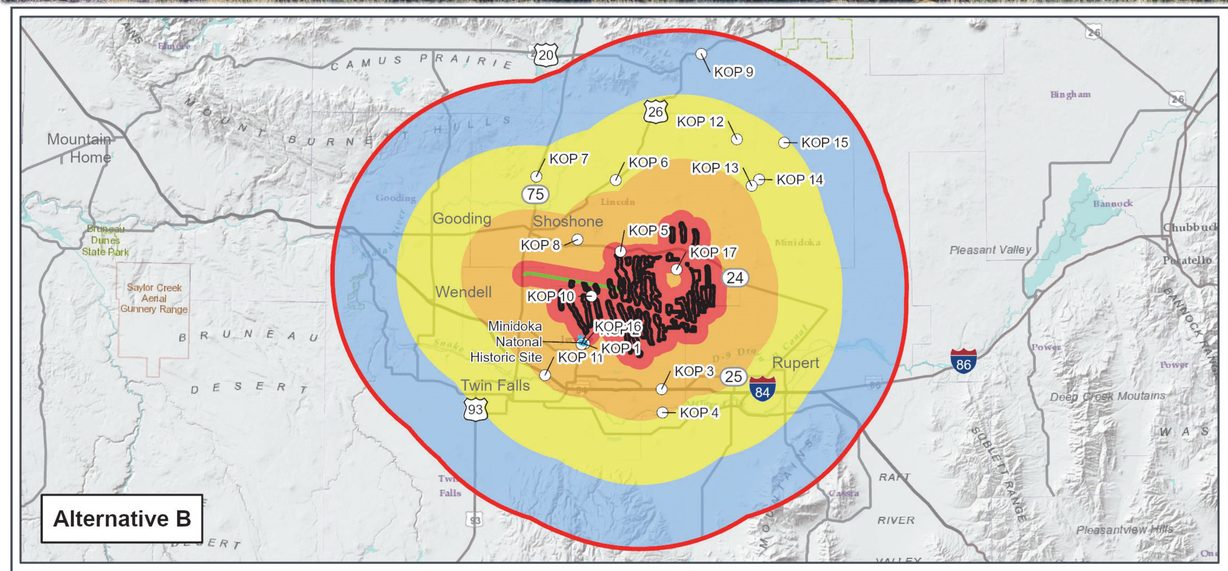
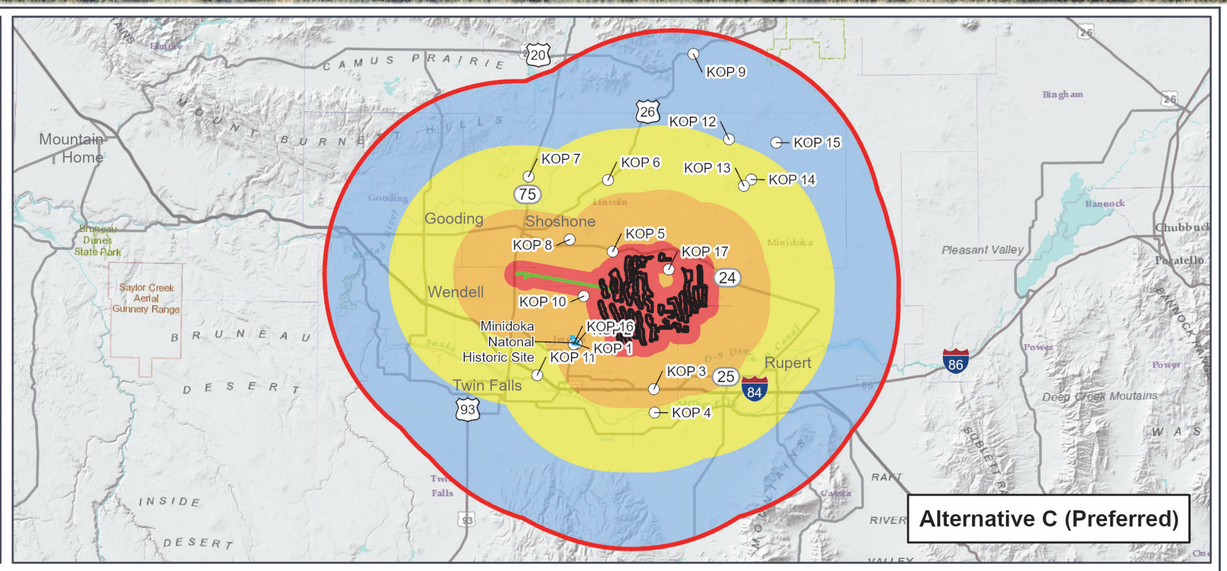
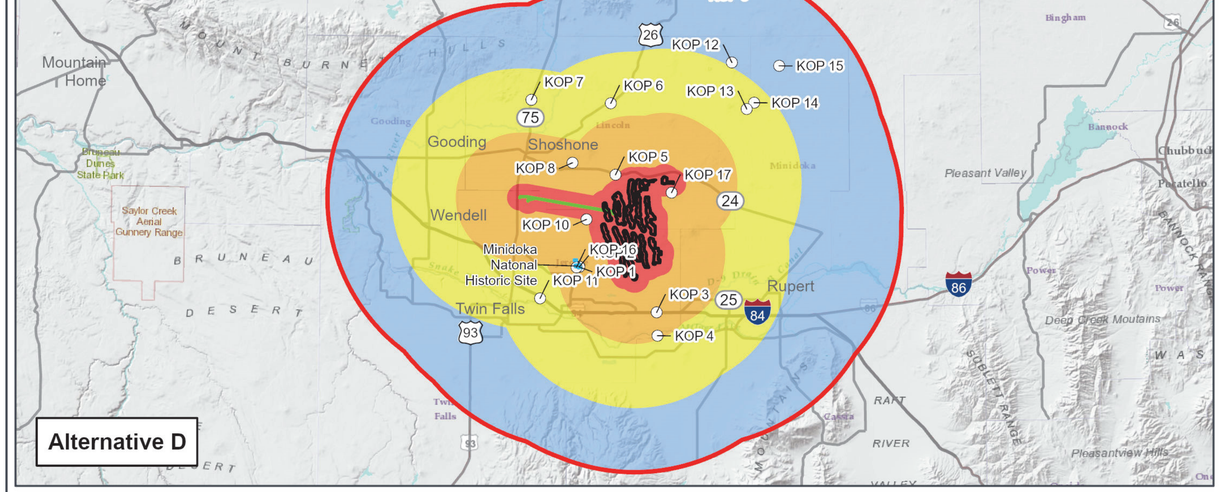
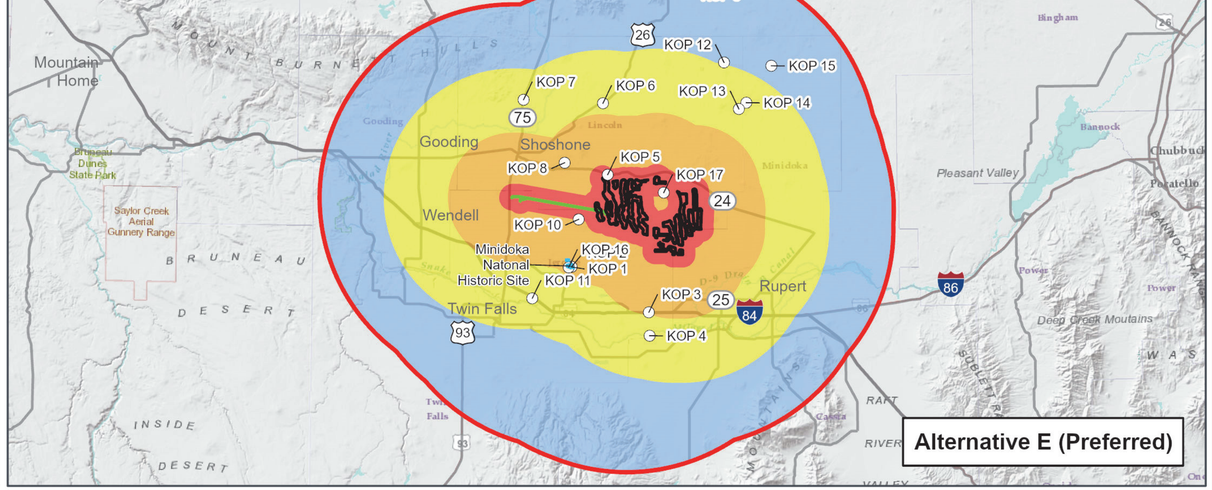
Key Observation Points (KOPs) and Distance Zones









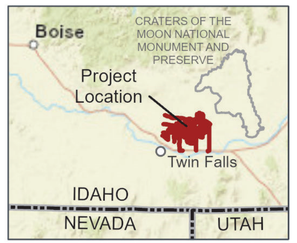
LAVA RIDGE WIND EIS

SWCA ENVIRONMENTAL CONSULTANTS

- Visual Resource Analysis Area
- Key Observation Point (KOP)
- Siting Corridor
- 500-kV Transmission Line
- Minidoka National Historic Site

Visual Resource Analysis Distance Zones

- Immediate Foreground 0–2 miles
- Foreground 2–10 miles
- Middleground 10–20 miles
- Background 20–30 miles
- Highway

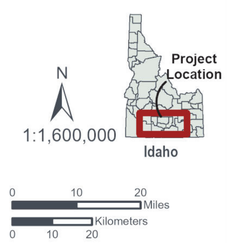


Jerome, Lincoln, and Minidoka Counties, Idaho

NAD 1983 Idaho TM

Base Map: Esri ArcGIS Online National Geographic World Map, accessed February 2023

Updated: 2/7/2023
Project No. 61005
61005_LRW_DEIS_PublicMeetings



BLM

Visual Simulation for Alternating Distances from Idaho Highway 24 (KOP 5) With 3-MW and 6-MW Turbines

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Visual Simulation for Minidoka National Historic Site Visitor Center (KOP 1)
Existing Condition

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Visual Simulation for Minidoka National Historic Site Visitor Center (KOP 1) Alternative E with 6-MW Turbines

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Visual Simulation for Minidoka National Historic Site Block 22 Barracks (KOP 2)
Existing Condition

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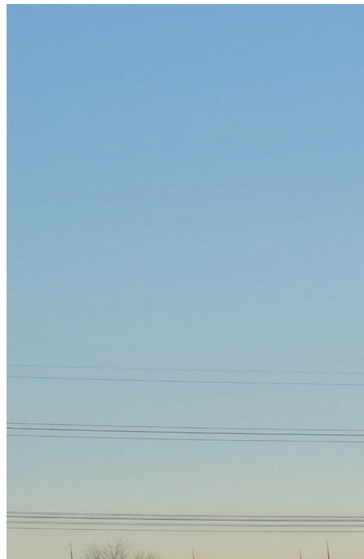
Visual Simulation for Minidoka National Historic Site Block 22 Barracks (KOP 2)
Alternative C: Morning with 6-MW Turbines



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Visual Simulation for Minidoka National Historic Site Block 22 Barracks (KOP 2)
Alternative C: Afternoon with 6-MW Turbines

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Visual Simulation for Sid Butte (KOP 17)
Alternative E with 6-MW Turbines

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