

TABLE 1-1  
 Responses to Public Comments on the Palouse Wind Draft Environmental Impact Statement (DEIS) (November 2010) and the Addendum to the DEIS (DEIS Addendum) (March 2011), SEPA Lead Agency: Whitman County, Washington  
 Palouse Wind LLC, Whitman County, Washington

Comment Number	Issues Raised	EIS Category	Commenter	Date Comment Received	Comments	Response to Comment	Documents and Pages in which Comment is Addressed
1 LAR-1	Supports Project	General	Robert Larsen Potlatch, ID 83855	Nov. 22, 2010	Support postcard: No written comments	Comment noted.	No change to the text required.
2 MOT-1	Supports Project	General	Motley-Motley Pullman, WA 99163	Nov. 22, 2010	Support postcard: "Great Project"	Comment noted.	No change to the text required.
3 EVA-1	Supports Project	General	Bill Evans Lacrosse, WA	Nov. 24, 2010	Support postcard: "Hi Alan, I just want to say hang in there"	Comment noted.	No change to the text required.
4 HAY-1	Supports Project	General	Gary Hayden Pullman, WA 99163	Nov. 24, 2010	Support postcard: "Palouse Wind Farm is a tremendous plus for Whitman Co."	Comment noted.	No change to the text required.
5 BEC-1	Supports Project	General	Carol and Bruce Becker Spokane, WA 99224	Nov. 24, 2010	Support postcard: "We're big supporters of Palouse Wind and alternative sources of energy. Please make this happen!"	Comment noted.	No change to the text required.
6 WHI-1	Low Frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	<p>"The EIS should acknowledge the fact that industrial wind turbines produce great quantities of high-level, low frequency noise pollution.</p> <p>The introduction of high levels of low frequency noise pollution into an environment containing the homes of families is an environmental impact and should be included in an environmental impact statement."</p>	<p>The potential for the generation of low-frequency noise by wind turbines is discussed on DEIS pages 3-188, 3-189, 3-192, and 3-197.</p> <p>The potential swishing noise associated with the rotation of turbine blades is often mistaken for low-frequency noise. The frequency content of the swish is typically within the 500 to 1,000 Hertz (Hz) range. The scientific, peer-reviewed journals do not support the hypothesis that there are harmful levels of low-frequency noise from wind turbines (Hessler, et al., 2008; Hessler, 2009; Leventhall, 2006). For wind turbines, the measurement of low-frequency noise is complicated by the presence of wind and the resulting wind-induced noise. Recent wind tunnel testing concludes that "any casual measurement of sound using a standard windscreen in a windy field will yield ostensibly high levels of low-frequency or infrasound noise whether the wind turbine is present or not" (Hessler, et al. 2008; Hessler, 2009). These studies note that the wind-induced self-noise resulted in approximately 74 C-weighted acoustic decibels (dBC) at both 1,000 feet as well as 3 miles from an operating wind project. Therefore, one is only measuring the self-generated wind noise across the microphone, rather than actual emissions from the wind turbine. When the measurements were corrected for wind-induced self-noise, a level of 48 dBC at 1,000 feet was estimated. This is below the 65 dBC level that was discussed on DEIS page 3-188, which some jurisdictions use as the potential indicator for further investigation. In addition, it is noted on DEIS page 3-192 that the Chief Medical Officer of Ontario found that "low-frequency sound and infrasound from current generation upwind model turbines are well below the sound pressure levels at which known health effects occur." As continued on DEIS page 3-197, a 2006 French National Academy of Medicine report notes that infrasound from wind turbines "have no impact on human health" and "This fear of infrasounds produced by wind turbines is, therefore, unfounded." However, there are individuals who remain concerned about the issue, as set forth in the comment, and who experience annoyance with sound emissions.</p>	<p>DEIS Section 3.15.4.2, paragraph 8 (page 3-192) will be revised to include the following sentence:</p> <p><i>It is recognized that some individuals experience an annoyance to or disturbed reaction from sound emissions of wind turbines. Annoyance is noted to be the primary affect related to low-frequency noise (Broner, 2007).</i></p>

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<b>7</b> <b>WHI-2</b>	Low Frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Ignoring the fact that the proposed Palouse Wind industrial wind turbine development will, if constructed, dump high levels of low frequency noise pollution onto nearby families is an act of malfeasance."	Please refer to the response to Comment 6 (WHI-1). The DEIS addressed concerns over low-frequency noise levels raised during the scoping period.	Please refer to the revisions based on the response to Comment 6 (WHI-1).
<b>8</b> <b>WHI-3</b>	Low Frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Due to its long wavelength, low frequency noise pollution travels far, easily penetrates walls, and can be amplified by the structure of a home."	Comment noted. Please refer to the response to Comment 6 (WHI-1).	No change to the text required.
<b>9</b> <b>WHI-4</b>	Health Impacts	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Low frequency noise affects the inner ear, which, in turn, affects a number of brain functions. One of these brain functions, which is triggered by the low frequency noise pollution of industrial wind turbines, prevents a person from sleeping. Lack of sleep leads to ill health"	The DEIS discussed the postulation cited in the comment, including potential for sleep disturbance. See DEIS pages 3-189, 3-190, 3-192, and 3-197. However, as noted on pages 3-192 and 3-197, independent reviews of scientific evidence available have not identified a link between low-frequency noise from wind turbines and direct and adverse health effects.	No change to the text required.
<b>10</b> <b>WHI-5</b>	Health Impacts	Health and Safety	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Industrial wind turbines will produce an unhealthful environment for families that live near them."	The DEIS discusses the varying reactions to sounds from wind turbines. See DEIS pages 3-192 and 3-197.	No change to the text required.
<b>11</b> <b>WHI-6</b>	Health and Safety	Health and Safety	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"The State Environmental Policy Act (SEPA, RCW 43.21C.020) requires Whitman County 'to use all practicable means to ... assure for all people safe, healthful... surroundings.'  'To use all practicable means to...assure for all people safe, healthful surroundings' is a duty imposed by law. Can Whitman County assure for all people safe, healthful surroundings when it allows industrial wind turbines near homes?"	The Proposed Action will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities. See also response to Comment 10 (WHI-5).	No change to the text required.
<b>12</b> <b>WHI-7</b>	Low Frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"NASA's report <i>Wind Turbine Acoustics</i> by Harvey H. Hubbard and Kevin P. Shepherd is proof that homes near industrial wind turbines will receive high levels of low frequency noise pollution. See Exhibit A of my September 3, 2010 <i>Comment on scope of EIS: Palouse Wind Project, Whitman County CUP 10-16.</i> "	The referenced report was issued in 1990, and does not address the current generation of modern upwind turbines. The document primarily discusses older generation downwind turbines. The report does not address the improvements that have been made in the past 20 years, which include improved manufacturing processes, optimized aeroacoustic aerofoil design, as well as acoustically engineered nacelle from modern three-bladed upwind turbines on tubular towers.  The potential for low-frequency noise is discussed on DEIS pages 3-188, 3-189, and 3-192.  Please refer to the response to Comment 6 (WHI-1).	DEIS Section 3.15.4.2, paragraph 7 (page 3-192) will be revised as follows:  <i>Concerns over low-frequency noise levels were raised during the DEIS scoping process. There has been some confusion regarding the presence of significant levels of low-frequency noise. Older generation downwind turbines (turbines where the blades pass downwind of the tower) were found to emit low-frequency pulses when the blades passed through the turbulent wake of the tower. Newer generation turbines designed in the last 20 years have moved to a modern three-bladed upwind configuration that includes aeroacoustically optimized blades and acoustically mitigated nacelles. These design modifications have eliminated the low-frequency pulses experienced with the downwind turbines.</i>
<b>13</b> <b>WHI-8</b>	Low Frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Exhibit J of the above mentioned <i>Comment on scope of EIS</i> is <i>Audiology Today's</i> cover story for July/August 2010 entitled <i>Wind Turbine Noise: What Audiologists Should Know</i> . This peer reviewed report states that homes near industrial wind turbines receive 'unweighted sound levels ranging from 60 to 70 dB Leq' (p. 24)."	DEIS page 3-197 discusses the referenced article. The studies cited by this Comment have been reviewed by the Chief Medical Officer of Ontario (2010) as well as the international multidisciplinary expert sound panel (Colby et al., 2009) (refer to DEIS pages 3-192 and 3-197). "Page 24" referred to in the comment discusses the hypothesis of Vibroacoustic Disease (VAD), which as noted on DEIS page 3-192, has been offered by a group of Portuguese researchers. As noted on page 3-192, these hypotheses have not been accepted by the international medical community.  Please refer to the response to Comment 6 (WHI-1).	No change to the text required.

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<b>14</b> <b>WHI-9</b>	Noise/Health and Safety	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Exhibit F of the above mentioned <i>Comment on scope of EIS</i> is <i>Wind Turbine Syndrome</i> by Doctor Nina Pierpont. The Draft EIS dismisses <i>Wind Turbine Syndrome</i> on the grounds that Pierpont chose to commercially publish her findings rather than publish her work in a scientific journal (p. 3-192). The venue of publication is not a valid reason to ignore evidence."	Comment noted. It is stated on DEIS page 3-192 that Dr. Pierpont's hypotheses have not been broadly accepted and that multiple independent reviews have not reached similar conclusions.	No change to the text required.
<b>15</b> <b>WHI-10</b>	Noise/Health and Safety	Noise	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	" <i>Wind Turbine Syndrome</i> is a scientific, peer reviewed report that cannot be flippantly brushed aside because Whitman County does not like its findings. A professional environmental impact statement would address the evidence given in the <i>Wind Turbine Syndrome</i> report."	Please refer to the response to Comment 14 (WHI-9).	No change to the text required.
<b>16</b> <b>WHI-11</b>	Process	General	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"Whitman County does not have the discretion to ignore evidence by falsely classifying it as not credible."	The various studies are discussed on DEIS pages 3-192 and 3-197.	No change to the text required.
<b>17</b> <b>WHI-12</b>	Health and Safety	Health and Safety	Roger Whitten Oakesdale, WA 99158	Nov. 29, 2010	"The large landowners of Whitman County have placed pressure on the county government to ignore the public health threat posed by industrial wind turbines. They know that a safe setback between industrial wind turbines and residential property will result in fewer turbines, which means fewer dollars.  James Madison in <i>Federalist Paper Number 10</i> made it quite clear that it is of fundamental importance that the rights of the minority are not sacrificed to the financial interests of a powerful faction.  Will Whitman County produce an honest environmental impact statement that recognizes the public health threat that industrial wind turbines create for nearby residents?  Will Whitman County protect the rights of the individual?  Or, will Whitman County government promote the private interests of a few large landowners and force residents near industrial wind turbines to absorb the negative impacts of their neighbor's land use decision?"	Comment noted. The varying views regarding the potential for public health effects are discussed in the DEIS. The Proposed Action will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.	No change to the text required.
<b>18</b> <b>GBEC-1</b>	DEIS Process	General	Gregg Beckley Benge, WA 99105	Dec. 8, 2010	"The level of transparency during the preparation of this document is also much appreciated by the residents of the county."	Comment noted.	No change to the text required.
<b>19</b> <b>GBEC-2</b>	Economic Opportunity	Socioeconomics / Land Use	Gregg Beckley Benge, WA 99105	Dec. 8, 2010	"A wind farm offers landowners and communities a new crop to harvest: the wind."	Comment noted.	No change to the text required.
<b>20</b> <b>GBEC-3</b>	Supports Project	General	Gregg Beckley Benge, WA 99105	Dec. 8, 2010	"Furthermore, the Palouse Wind project will offer an opportunity for Whitman County to participate in the national and state trend of generating electricity from an abundant, clean, and renewable resource. Let's be part of the future - not let it pass us by."	Comment noted.	No change to the text required.
<b>21</b> <b>GBEC-4</b>	Tax Revenue	Socioeconomics	Gregg Beckley Benge, WA 99105	Dec. 8, 2010	"I am particularly excited about the substantial tax revenue that the Palouse Wind project will bring to the area, as outlined in the DEIS."	Comment noted.	No change to the text required.
<b>22</b> <b>GBEC-5</b>	Job Creation	Socioeconomics	Gregg Beckley Benge, WA 99105	Dec. 8, 2010	"In these hard economic times it is more important than ever for our local government to support private enterprise in order to create employment. Over 160 construction jobs, and 18 operations jobs will positively boost the local economy. These jobs will allow our children to have a future where they grew up."	Comment noted.	No change to the text required.

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<b>23</b> <b>COL-1</b>	Supports Project	General	Chud J. Wendle Coldwell Banker Pullman, WA 99163	Dec. 9, 2010	"As I examine the DEIS from the Whitman County website, I am confident that a thorough job has been done and there is no reason to delay the approval."	Comment noted.	No change to the text required.
<b>24</b> <b>COL-2</b>	Job Creation	Socioeconomics	Chud J. Wendle Coldwell Banker Pullman, WA 99163	Dec. 9, 2010	"In these hard economic times it is more important than ever for our local government to support private enterprise in order to create opportunity. The Palouse Wind project will bring over 160 construction jobs and 18 operations jobs. This activity will positively boost the local economy, which will in turn benefit businesses like mine."	Comment noted.	No change to the text required.
<b>25</b> <b>COL-3</b>	Socioeconomic Benefits	Socioeconomics	Chud J. Wendle Coldwell Banker Pullman, WA 99163	Dec. 9, 2010	"The DEIS clearly explains the socioeconomic benefits to our area. Let's stream line this process and approve this DEIS so there are less chances of creating obstacles for the Palouse Wind project."	Comment noted.	No change to the text required.
<b>26</b> <b>YAK-1</b>	Regulatory Authority	Cultural Resources	Johnson Meninick Yakama Nation Cultural Resources Program Manager Toppenish, WA 98948	Dec. 10, 2010	"Regulatory Authority: According to the Literature Review and the Draft Environmental Impact Statement (DEIS), this project is being reviewed under SEPA, via the county CUP process. However, the Literature Review prepared by Plateau Archaeological Investigations states that archaeology will be conducted in compliance with Section 106 of the Nation [sic] Historic Preservation Act (NHPA). It should be noted, however, that the application of NHPA is inappropriate on state level projects reviewed under SEPA. Rather, archaeological investigations conducted on state-level projects should be conducted in compliance with RCW 27.53. Yakama Nation CRP request the Literature Review be amended to reflect state-level archaeological review in compliance with RCW 27.53. If the project does indeed have a federal nexus, we request it be clearly defined and the DEIS amended to reflect review under the appropriate regularity authority."	The <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011) has been revised to indicate that the Proposed Action is being reviewed per the State Environmental Policy Act (SEPA) and that Whitman County is the lead agency.  DEIS Section 3.8.3, as previously submitted, correctly states that Whitman County is the lead SEPA agency for the Proposed Action (see DEIS page 3-99).	No change to the text required.
<b>27</b> <b>YAK-2</b>	Traditional Cultural Properties	Cultural Resources	Johnson Meninick Yakama Nation Cultural Resources Program Manager Toppenish, WA 98948	Dec. 10, 2010	"Traditional Cultural Properties: The Yakama Nation CRP has extensive knowledge regarding TCPs within the usual and accustomed areas of the Yakama Nation. The majority of this information is unpublished and unavailable to the public. Information regarding TCPs should be obtained from Yakama Nation through county government consultation."	Comment noted. The author recognizes and respects that the majority of the information regarding TCPs, if required, is usually unpublished and unavailable to the public, and should be obtained through tribal representatives.	No change to the text required.
<b>28</b> <b>YAK-3</b>	Field Methods	Cultural Resources	Johnson Meninick Yakama Nation Cultural Resources Program Manager Toppenish, WA 98948	Dec. 10, 2010	"Field Methods: Yakama Nation CRP has found that survey of buildable land has been more effective than survey of micro-siting plans. Micro-siting plans often change throughout the EIS and final CUP decision. Since micro-siting-based survey corridors are often narrow, changes in final layout result in numerous supplemental surveys. This has, on previous wind projects, led to confusion that ultimately resulted in damage to archaeological and cultural sites."	The micro-siting area selected by Palouse Wind and presented in the Conditional Use Permit (CUP) application and DEIS is more conservative than the "corridors" used to assess the impacts of other wind projects. Palouse Wind has purposely defined a larger micro-siting area to retain flexibility in siting facilities for the Proposed Action. The entire micro-siting area was surveyed for cultural resources. Should the micro-siting area require adjustment, Palouse Wind would conduct cultural resources surveys in those areas where ground disturbance is planned, but where a survey has not been conducted.	No change to the text required.

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<b>29</b> <b>FAA-1</b>	Airspace	Health and Safety	Deepa Parashar Federal Aviation Administration Renton, WA 98057- 3356	Dec. 13, 2010	<p>"This proposal for 39 wind turbines went through a FAA 7460 Airspace Study in 2009. Through this study Tech Ops found no objection with provision for all 39 turbines:</p> <p><i>We have reviewed the subject DE. Based on current FAA guidelines for evaluating wind turbine impacts 10 primary and secondary radars, we concur with the proposal, with the following comments:</i></p> <ol style="list-style-type: none"> <li>1. <i>The proposed wind turbines will be in line-of-sight from the Mica Peak, Washington ARSR-4.</i></li> <li>2. <i>A majority of the proposed wind turbines are within a four (4) nautical mile coordination zone on either side of a Victor Airway. The Victor Airway is V253.</i></li> <li>3. <i>Effects 10 the Mica Peak radar include:</i> <ol style="list-style-type: none"> <li>A. <i>Unwanted primary radar returns (clutter)</i></li> <li>B. <i>Non-associated beacon radar targets</i></li> <li>C. <i>Primary target drops in all areas of the turbines"</i></li> </ol> </li> </ol>	Palouse Wind has followed established procedure to notify the Federal Aviation Administration (FAA) regarding the over-height structures associated with this Proposed Action. As noted in the comment, Forms FAA 7460 were filed in 2009, and Determinations of Non Hazard were received. Palouse Wind will re-file the final configuration with the FAA prior to construction.	No change to the text required.
<b>30</b> <b>MAL-1</b>	DEIS Process	General	Wayne Maley Thornton, WA 99216	Dec. 14, 2010	<p>Support postcard:</p> <p>"I received a letter [notice of the DEIS] from Alan Thomson County planner the other day. Am answering...your idea, it's good."</p>	Comment noted.	No change to the text required.
<b>31</b> <b>SEW-1</b>	Economic Research	Socioeconomics	Duane C. Wollmuth Southeast Washington Economic Development Association Clarkston, WA 99403	Dec. 14, 2010	"SEWEDA was also the sponsor of a study conducted by Entrix, Inc. in 2009 on the Economic Impacts of Wind Energy Projects in Southeast Washington. This study, and others, have shown that wind farm projects have significant and varied positive impacts on the communities and counties in which they are constructed and operated."	Comment noted.	No change to the text required.
<b>32</b> <b>SEW-2</b>	DEIS Process	General	Duane C. Wollmuth Southeast Washington Economic Development Association Clarkston, WA 99403	Dec. 14, 2010	"It is our position that the DEIS presents a thorough and unbiased analysis of potential impacts to both the natural and man-made environments in Whitman County resulting from the construction, operation and decommissioning of the Palouse Wind Project."	Comment noted.	No change to the text required.
<b>33</b> <b>SEW-3</b>	Economic Benefits	Socioeconomics	Duane C. Wollmuth Southeast Washington Economic Development Association Clarkston, WA 99403	Dec. 14, 2010	"The economic impacts, including jobs, taxes, and economic diversification, will be substantial. It is during times, such as the current economic recession we are in, when rural communities throughout the U.S. struggle to not only compete for economic development, but simply survive. Wind farm projects, such as Palouse Wind, provide farmers and other landowners, another income stream that enables them to diversify and pass on their holdings to their children and future generations."	Comment noted.	No change to the text required.
<b>34</b> <b>SEW-4</b>	DEIS Process	General	Duane C. Wollmuth Southeast Washington Economic Development Association Clarkston, WA 99403	Dec. 14, 2010	"We believe the Draft EIS has thoroughly addressed the environmental impacts to vegetation, wildlife, and water, and provided adequate mitigation plans to these impacts. In summary, SEWEDA believes the DEIS is complete and acceptable, and that the Palouse Wind Project EIS should be accepted and approved."	Comment noted.	No change to the text required.

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<b>35</b> <b>DAY-1</b>	Job Creation	Socioeconomics	Craig George Mayor, City of Dayton Dayton, WA 99328	Dec. 15, 2010	"As the Mayor of Dayton, WA, I have seen the positive impact of the Wind projects have had on the economic viability of Columbia County. Our projects have met all of the environment impact statements (EIS) that were established here. The economic impact of the Wind projects has been tremendous. One of the biggest, if not the single most impact here in the area has been the 40 jobs that were created and filled by people under 40. There is finally a reason for young people to stay in the communities they grew in [sic] now that there are good paying jobs so they can raise their families."	Comment noted.	No change to the text required.
<b>36</b> <b>DAY-2</b>	Economic Benefits	Land Use and Agriculture/ Socioeconomics	Craig George Mayor, City of Dayton Dayton, WA 99328	Dec. 15, 2010	"Many of our farm families now have a alternative means of income when times are tough."	Comment noted.	No change to the text required.
<b>37</b> <b>DAY-4</b>	Supports Project	General	Craig George Mayor, City of Dayton Dayton, WA 99328	Dec. 15, 2010	"I strongly encourage you to approve the Palouse Wind project in your county."	Comment noted.	No change to the text required.
<b>38</b> <b>KIE-1</b>	Insufficient Notice	Visual and Aesthetic	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I find it astounding that a photograph of my farm is used in this report (Figure 11a of Appendix H); when factually, NEVER, EVER, has anyone from Whitman County or First Wind, or any agents representing them, contacted me, either by letter, phone or a personal visit to advise me of this 'proposed project' or to discuss the impact of the project on my life, health, property value or any other potential impact. When I met with the County Planner on December 10, 2008, (just after finding out about this proposed development) and asked why I was not contacted, he told me it was because I was not close enough to the project to contact. Only those near the proposed project would have been contacted. If I am near enough to the project to have a picture of my home in the EIS, then the Planner, as a public servant, should have the decency to contact me about a development which proposes to industrialize my neighborhood."	<p>Whitman County issued notice of the receipt of an application for a CUP and of the scoping for and issuance of the DEIS according to applicable local and state requirements. Notice was also provided for the DEIS Addendum. The requirements ensure that information about a project is distributed through a wide range of notification methods outlined in the Executive Summary of the DEIS (see pages DEIS pages ES-6 through ES-8).</p> <p>Adjacent landowners within 1,500 feet of the Proposed Action boundary were sent notices of the CUP application, Determination of Significance, and Requests for Scoping Comments, and were given an opportunity to comment on the scope of DEIS (August 26 through September 16, 2010) and the DEIS Addendum (March 3 through March 14, 2011).</p> <p>The industrial farming activities within most areas of Whitman County, including in the Oakesdale area, have been in operation for over 100 years. Palouse Wind and the landowners within the Proposed Action boundary are proposing to bring a commercial wind industry to Whitman County. These uses are compatible with the goals of Whitman County Comprehensive Plan that call for "development of new industrial uses...as a means of supporting the long term economic health of the County's communities." Smaller scale wind turbines have been used in Whitman County over the last 50 years or more.</p>	The FEIS Executive Summary has been updated to include the public notice and involvement activities that have occurred since issuance of the DEIS. Please see FEIS pages ES-4 and ES-5 for a list of updated efforts.

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<b>39</b> <b>KIE-2</b>	Public Notice	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I would like to point out that when one's property is in jeopardy of losing part, or all of its value, and where a number of turbines have an unobstructed line of sight to that property, and thus no obstruction for sound/noise, or low frequency sound waves, then it is obvious that a citizen has a right to be contacted by the government that is allowing these negative impacts to one's property."	Comment noted. Please refer to the response to Comment 38 (KIE-1). The DEIS was issued in compliance with the Chapter 9.04 of Whitman County Code (WCC) and applicable notice requirements contained in the SEPA Guidelines adopted by the WCC (WAC 197-11-010 through WAC 197-11-955). In addition, numerous public meetings were held and several newspaper notices were published in the <i>Whitman County Gazette</i> regarding the Proposed Action. Additional information on Palouse Wind's public involvement efforts is contained in the Executive Summary of the DEIS (DEIS pages ES-6 through ES-8), and as updated in this FEIS (see page ES-4).  Regarding property value, please refer to the response to Comment 138 (GIB-18).	Please refer to the revisions based on the response to Comment 38 (KIE-1).
<b>40</b> <b>KIE-3</b>	DEIS Process	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I have never been involved in this type of process before, therefore my expectations of such a report, I suppose, are fairly 'high.' This report, in my opinion, is merely a bloated Public Relations piece. At every opportunity the 'DEIS' propagandizes and seems to be an attempt to give the developer an appearance of being the 'saviour' of Whitman County and citizen's best friend."	Comment noted.	No change to the text required.
<b>41</b> <b>KIE-4</b>	DEIS Process	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Having done in-depth research on the developer, the industry and all of its ancillary professional services, in the form of other 'brother corporations,' I believe the report to be a sham. I have read statements of those who have been through this process, who say that it is nothing more than a glorified 'formal' HOOP through which a developer must leap before he is granted the permission to ravage the rural landscape with impunity. It makes one wonder if, in the past, a DEIS actually ever was a report of value."	Comment noted. Whitman County has prepared the Draft and Final EIS, and conducted its review under SEPA, according to the applicable regulations of WCC Chapter 9.04 and applicable Washington Department of Ecology regulations (WAC 197-11-010 through WAC 197-11-955).	No change to the text required.
<b>42</b> <b>KIE-5</b>	DEIS Process	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"When I first learned the DEIS was to be overseen by CH2M HILL, I found that troubling. For the sake of objectivity, I believed that a 'disinterested' third-party would be hired to oversee the factual presentation in the DEIS. CH2M Hill is an organization that, in my opinion, based on my research, has an incestuous relationship with First Wind, the developer. When a corporation shares employees (i.e. KELLY BRONSON), in my opinion, the line has been crossed. It seems to me that when you want to be 'above board,' you hire someone with whom you have no connections, in order to avoid any semblance of impropriety."	WCC 9.04.090(A), Preparation of EIS, allows an EIS to be prepared by a "consultant retained by the private applicant." Under such circumstances, Whitman County's responsible official "oversees the preparation of the EIS to ensure it is prepared in a responsible manner and with appropriate methodology" (WCC 9.04.090(B)). The responsible official also directs the areas of research and examination to be undertaken, as well as the organization of the resulting document. Thus, as required by County code, the County responsible official oversaw preparation of the EIS, not CH2M HILL.  CH2M HILL team members were carefully selected to ensure that there is no conflict of interest with this Proposed Action.	No change to the text required.
<b>43</b> <b>KIE-6</b>	Project Description	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"In addition, as I read through the DEIS I found it to be VERY 'non-committal.' First Wind 'hedges' throughout the document: 1) the size of the project is not stated with conclusive certainty; 2) the numbers of turbines to be used is also unclear; 3) the specific TYPE/Model and Make of turbines and their height is not given. This information should not be something that is 'determined at a later time'."	Comment noted. The Proposed Action described and analyzed in the DEIS is representative of the Proposed Action for which a CUP is being sought. The purpose of the EIS is to identify and disclose the potential impacts of the Proposed Action.  Palouse Wind has identified the maximum number of turbines to be permitted, i.e. up to 65. Likewise, the CUP application and associated amendments restrict the tip height of the turbines not to exceed 492 feet. As indicated in both the CUP application and the DEIS, Palouse Wind requests the flexibility to select the specific size and generation capacity of the turbine prior to final site plan approval by Whitman County,	No change to the text required.

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						<p>provided it meets the criteria outlined above.</p> <p>The DEIS acknowledges that the impacts resulting from the largest possible turbine currently available (3.0 MW) may be different from a smaller turbine, and evaluates the impacts that are likely to occur as a result from the use of a range of possible turbine sizes.</p> <p>Prior to final site plan approval by Whitman County, Palouse Wind will identify the turbines ultimately chosen to the County, and will demonstrate how the Proposed Action using these turbines is in compliance with the applicable design standards of WCC 19.61.060, Development Standards and Criteria, as well as with the requirements of the CUP.</p>	
<b>44</b> <b>KIE-7</b>	DEIS Analysis	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	<p>"Reports and models are used to conclude whatever someone 'wishes' to conclude. A person (or corporation) can hypothesize on 'outcomes' until the cows come home, but that will not necessarily make it so. Better had they used specific examples of other like-projects, the prior calculations for those specific projects and the final outcome of those specific projects once they were concluded. Models are worthless."</p>	<p>Comment noted. The use of existing reports and models in a DEIS is permitted under Washington Administrative Code. WAC 197-11-402(7) states, "Agencies shall reduce paperwork and the accumulation of background data by adopting or incorporating by reference, existing, publicly available environmental documents, wherever possible."</p> <p>Regarding the use of specific examples, the preparers of the DEIS did in fact incorporate data from similar existing wind energy facilities into the analysis presented in the DEIS (see DEIS Appendixes C, E, and F). For example, DEIS Appendix F, <i>Avian, Bat and Habitat Cumulative Impacts Associated with Wind Energy Developments in the Columbia Plateau Ecoregion of Eastern Washington and Oregon</i> (WEST Inc., 2010), presents data from 12 similar wind energy facilities located within the Columbia Plateau Ecoregion (CPE), where the Proposed Action is located. Using these existing data sets allowed the preparers of the DEIS to base their analysis on the most current relevant data associated with wind energy development in the CPE.</p>	No change to the text required.
<b>45</b> <b>KIE-8</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	<p>"In regard to Avian Use Data Analysis compiled by Northwest Wildlife Consultants, under 3.4.1 Target Species. They state: 'Based upon WDFW and USFWS lists, NWC regional experience, and a habitat review of the area utilizing aerial photos, eleven species of birds, eight species of mammals, and five species of reptiles were determined as possible inhabitants within the NWC survey Area during the survey period.' In other words, species were not 'found' in the area under consideration, but rather the writer of this report based 'findings' of 'possible' species from 'lists.' This is unsatisfactory. The Eastern Washington Palouse Region is UNLIKE the other areas/regions which have been studied by WDFW and USFWS and to 'assume' that species found in the areas which have actually been 'studied' will be found in the habitat that will be disturbed by this construction is, again, unsatisfactory. This is a unique area and it should have been studies with 'feet-on-the-ground' to make solid determinations of 'actual' species. Not only might there NOT be the same species in the area of the project, there may be other species not listed which are found in the project area. This oversight should be corrected, if this report is to be taken seriously."</p>	<p>DEIS Section 3.3.1.1 (page 3-24) includes the following passage:</p> <p>"In addition to the existing information resources (listed above), from summer 2008 through summer 2010, Palouse Wind's consultants gathered site-specific baseline data during field surveys necessary to describe the affected environment and analyze potential impacts of the Proposed Action."</p> <p>As indicated in Section 3.4.1 of DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010) and in DEIS Section 3.3.1, NWC reviewed available special status species lists prior to conducting the field surveys. NWC used available lists to prepare a comprehensive list of species that were likely to occur based on past records of occurrence, existing wildlife habitats within the Proposed Action area, and its experience conducting surveys in the general area. Priority Habitat and Species (PHS) data requests were made to the Washington Department of Fish and Wildlife (WDFW) in 2008, 2009, and 2010.</p> <p>WDFW representatives attended a site visit with Palouse Wind personnel on March 2, 2010. Prior to this site visit, Palouse Wind presented the Palouse Biological Study Plan to WDFW for review and comment. The study plan describes the</p>	No change to the text required.

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						<p>methodology for the field surveys in the Proposed Action area. WDFW responded to Palouse Wind on March 15, 2010 indicating that they had reviewed the plan and did not have any comments.</p> <p>The resulting list of target special-status species was used to focus field survey efforts. "Feet-on-the-ground" field surveys were conducted in the Proposed Action area between 2008 and 2010 by NWC, CH2M HILL, and others specifically for the Proposed Action. The list of species observed (see "Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind Whitman County, Washington" [NWC, 2010], page 46) represents the list of special-status target species as well as information about whether the species was observed during field surveys. The list also notes whether species that were not directly observed were expected to occur in the Palouse Wind area based on habitat suitability or information obtained from the natural resource agencies.</p>	
<b>46</b> <b>KIE-9</b>	Raptor Nests	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Next in section 3.5 Raptor Nest Survey - The report says that 'a single aerial Survey' was done on May 14, 2009, from a helicopter. It also indicates that at the time the actual boundary lines of the project were unknown. How accurate can a survey be, when the person making the survey doesn't even know the actual area where the project will be located? This is unbelievable to me."	It is standard practice to conduct one aerial survey for raptors (WDFW <i>Wind Power Guidelines</i> , 2009). Once micro-siting is complete, areas that have not been surveyed will be surveyed prior to final site plan approval by Whitman County. The general Proposed Action area was known at that time.	<p>DEIS Section 3.3.6.2, (page 3-47) will include the following mitigation measure:</p> <ul style="list-style-type: none"> <li><u>Palouse Wind will conduct an additional raptor nest survey in areas located within a 2-mile buffer of the Proposed Action area that were surveyed as reported in Appendix C of the DEIS; this additional survey will be conducted in the spring season prior to beginning of construction.</u></li> </ul>
<b>47</b> <b>KIE-10</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Additionally, the report indicates that WDFW told CH2M Hill: '...there is a gap in their PHS [Priority [sic] Habitat & Species] data in the Palouse Wind area and no alternative data is available (Gronli, Pers. Comm., 2010).' So the report says only that 'the lack of returns does not necessarily indicate that priority habitats and species are not present, but rather that data is not available.' Isn't the purpose of this EIS, to learn if there are priority habitats and species in the area in question? This report just says that WDFW says they don't have the data -- and leaves it at that. Once again -- this is unacceptable! I thought this report was supposed to be comprehensive and factual, obtaining the necessary information."	Page 6 of DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010), acknowledges the gap in the WDFW Priority, Habitat and Species (PHS) data. Therefore, the field teams conducted the appropriate field surveys to confirm presence or absence of PHS specifically within the Proposed Action area. As noted in the response to Comment 45 (KIE-8), Palouse Wind coordinated with WDFW on the Biological Study Plan. In addition, three separate PHS data requests were made of WDFW and each time the request returned no data for the Proposed Action site.	<p>DEIS Section 3.3.1.1 (page 3-24), first bullet will be revised as follows:</p> <ul style="list-style-type: none"> <li><i>WDFW PHS database records for habitats and species within 2 miles of all proposed facilities (WDFW, 2008, 2009, 2010)</i></li> </ul> <p>DEIS Section 3.3.1.1 (page 3-24), third bullet will be revised as follows:</p> <ul style="list-style-type: none"> <li><i>Contacts with WDFW personnel with knowledge of wind energy and wildlife use of in the Proposed Action area for supplementary data on wildlife and/or habitat information in the general area was made in early 2010 to review a Biological Study Plan and survey data collected to date; a site visit with WDFW staff on March 2, 2010 was completed to enhance WDFW's understanding of the Proposed Action and gather supplementary data on wildlife and/or habitat information known to WDFW personnel in the general area.</i></li> </ul>
<b>48</b> <b>KIE-11</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Further along in the report it talks about 'four seasons of avian use results for Palouse Wind were compared to four seasons of avian use at Hopkins Ridge and Stateline wind projects . . .' Once again, the WDFW Wind Power Guideline says that 'Two or more years of relevant data are recommended in the following cases: 1) risk to avian groups of concern is estimated to be high, 2) there is limited or no relevant data regarding seasonal use of the project site (e.g., data from nearby areas of similar habitat type), and/or 3) the project is significantly diverse in habitat and species. This additional avian use data should be collected to refine impact predictions and make decisions on	<p>Avian use surveys were conducted for the Proposed Action boundary between August 2008 and August 2010. The resulting data include two winter seasons, two spring seasons, one summer season, and one fall season for a total of six seasons of data. The surveys meet the recommendations contained in the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009). WDFW staff reviewed and accepted the Biological Study Plan.</p> <p>A benefit of discontinuous seasonal data is that it accounts better for year-to-year variation of species presence in the</p>	<p>DEIS Section 3.3.1.1 will incorporate the following text in the last paragraph "Review of Existing Information and Agency Coordination" (page 3-24):</p> <p><u>In January 2011, Palouse Wind's consultants conducted additional avian surveys of the Proposed Action area at previously surveyed Plots B, C, D, E, and F starting January 31, 2011 and ending March 9, 2011. Three additional study plots were added and surveyed to gather additional information about the Proposed Action area. Plots G, H, and I were established and surveyed during this partial winter season. A summary of this winter 2011</u></p>

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					<p>project layout.' The point I will emphasize here is that there is no relevant data for this specific project site, as there are none of a similar nature (see number 2 above). The KEY is that 'seasons' are not satisfactory --- the WDFW Guideline calls for YEARS, not seasons. There IS a difference! Based on the EIS to this point, I find the subsequent data and conclusions to be inaccurate."</p>	<p>Proposed Action boundary.</p> <p>There is no evidence that the Proposed Action represents a high risk to avian groups or individual bird species (see DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> [NWC, 2010], page 13).</p> <p>The Hopkins Ridge and Stateline projects, which are located approximately 55 and 103 miles from the Proposed Action site, respectively, are the closest facilities with similarities to Palouse Wind. These two facilities, as well as the Proposed Action boundary, are located within the defined Columbia Plateau Ecoregion. The general habitat and landscape associated with Hopkins Ridge and Stateline is similar to the Proposed Action within a regional basis.</p> <p>The Proposed Action boundary area consists primarily of agricultural and disturbed habitats, similar to those identified at the Hopkins Ridge and Stateline wind projects. Native grasslands, which include Palouse Prairie habitat, account for less than 4 percent of the total Proposed Action boundary (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> [NWC, 2010], pages 7 and 8). It is important to note that small, discontinuous habitat patches of higher quality habitats (e.g., Palouse Prairie) have limited ability to support wildlife, particularly less common species, due to edge effects, which make them more attractive to common ravens, coyotes, and other disturbance-adapted fauna (Johnson 2001, Sauvajot et al. 1998).</p>	<p><u>avian point count data is included as an appendix to this FEIS.</u></p> <p>DEIS Section 3.3.2.2, paragraph 2 (page 3-28) will be revised as follows:</p> <p><i>Avian point count surveys were conducted weekly at five plots during fall 2008, winter 2008/2009 and 2009/2010, spring <del>2009</del> 2008 and 2009, and summer 2010, thus meeting the WDFW Wind Power Guidelines requirement for a pre-project assessment of avian use suitable for predicting impacts (WDFW, 2009). A total of 1,646 individual birds were recorded in 661 groups. Surveyors documented 43 bird species during the avian use surveys (including incidentals). A comprehensive list of species observed during baseline studies is included in Appendix C. Table 3.3-3 summarizes mean use by avian group. In January 2011, Palouse Wind initiated additional weekly avian point counts to characterize avian usage of the Naff Ridge area west of US 195, and the Steam Shovel Hill area. Avian point counts were also resumed in the Naff Ridge area for the winter season. The Preliminary Summary of the Winter 2011 Avian Use Point Counts is provided as an appendix to this FEIS. Since the counts are still ongoing as of the issuance of the FEIS, the data is not incorporated into the overall avian use assessment discussed below.</i></p> <p>DEIS Section 3.3.6.1 (page 3-46), will be revised to include the following mitigation measures:</p> <ul style="list-style-type: none"> <li><i>Palouse Wind will conduct a spring 2011 raptor nest survey prior to final site plan approval by Whitman County. This survey will include the Proposed Action area described in the DEIS Addendum and a 2-mile buffer around it.</i></li> <li><i>Palouse Wind will conduct additional weekly avian use point count surveys from old and new locations during the months of January through March 2011 within the Proposed Action area prior to final site plan approval by Whitman County.</i></li> </ul> <p>DEIS Section 3.3.6.2 (page 3-46), will be revised to include the following mitigation measure:</p> <ul style="list-style-type: none"> <li><i>Palouse Wind will conduct additional avian use point counts in the Naff Ridge area west of US 195 and in the Steam Shovel Hill area prior to final site plan approval by Whitman County. Results of these surveys will be provided to Whitman County and to WDFW.</i></li> </ul> <p>DEIS Section 4.4 will include the following additional references:</p> <p><i>Johnson, D. 2001. "Habitat fragmentation effects on birds in grasslands and wetlands: a critique of our knowledge." Great Plains Research 11(2): 211-231. Jamestown, ND, Northern Prairie Wildlife Research Center Online.</i>  <a href="http://www.npwr.usgs.gov/resource/birds/habfrag/inde">http://www.npwr.usgs.gov/resource/birds/habfrag/inde</a></p>

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							<a href="#">x.htm [Version 21FEB2003]</a> . <u>Sauvajot, R.M., M. Buechner, D. Kamradt, and C. Schonewald. 1998. "Patterns of human disturbance and response by small mammals and birds in chaparral near urban development." <i>Urban Ecosystems</i>. 2:279-297.</u>
<b>49 KIE-12</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Furthermore, to calculate bird mortality in terms of avian collisions based on numbers that do not correspond with 'Guidelines' is folly. This report uses insufficient 'seasonal' data to 'conjure' important conclusions. This report does not follow the WDFW Wind Power Guidelines recommendations. This is unacceptable."	NWC, a local consulting firm that has conducted over 20,000 avian use counts for over 35 projects in the region, conducted the data collection and analysis in accordance with the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009), as well as other commonly accepted scientific methods and guidelines, including <i>Studying Wind Energy/Bird Interactions: A Guidance Document</i> (Anderson, et al., 1999). NWC has been conducting aerial nest surveys in eastern Oregon and Washington for 20 years; most surveys in the past 11 years have been for energy development such as transmission lines, wind, natural gas sites, and linear facilities that support Bonneville Power Administration (BPA), federal government agencies, and private energy companies.  As noted in the response to Comment 45 (KIE-8), WDFW agreed with the methodology outlined in the Biological Study Plan.	DEIS Section 4.4 will include the following additional reference:  <u>Anderson, R., M. Morrison, K. Sinclair, and D. Strickland. 1999. <i>Studying Wind Energy / Bird Interactions: A Guidance Document. Prepared for the National Wind Coordinating Committee.</i></u>
<b>50 KIE-13</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"At the bottom of Table 3.3-4 Raptor Nest Density, there is a Comment about not including American Kestrel nests because 'identification requires extensive ground-based surveys.' The American Kestrel is a 'species of concern' and I know that it is also a species with a strong presence in the project area. It seems rather negligent, to me, to simply state that the survey would be too 'extensive.' This report is supposed to provide information, not excuses."	Kestrels nest in cavities, cliffs, and a variety of structures. As such, and as understood by professional ornithologists and amateur birders, it is very difficult to observe this species' nests during aerial nest surveys. The American kestrel is a common raptor that has no protected status in Washington state or federally. The species is classified as Least Concern by the International Union for Conservation of Nature. Suspected kestrel nests will be verified prior to final site plan approval by Whitman County so that appropriate buffers can be established.  American kestrel were addressed in Tables 2, 3, 4, 5, and 9 in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010).	DEIS Section 3.3.4.1, paragraph 2 under "Impacts to Avian Species" (page 3-34) will be revised as follows:  <i>Overall, the risk of mortality to birds during construction is low, considering the general lack of suitable nesting habitat in the areas proposed for construction. Impacts to ground-nesting species could occur, but these species are likely to be habituated to disturbance from agricultural activities in the area and are unlikely to be significantly disturbed by construction of the Proposed Action. Prior to final site plan approval by Whitman County, raptor nests identified in proximity to planned construction activities will be verified for occupation so that species- and lifecycle-appropriate construction buffers can be established to minimize disturbance.</i>
<b>51 KIE-14</b>	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Early on I had requested that nocturnal migratory studies be done, based on advice from an Avian Biologist acquaintance, Mike Denny; yet in the EIS it states: 'Nocturnal migrants and raptors (owls) are challenging to survey in terms of mean use, thus no nocturnal surveys were conducted for the Proposed Action. Nocturnal migrant studies have been conducted at various projects in the CPE with mixed results. For this report, the authors assumed similar nocturnal migrant rates with the Hopkins Ridge and Stateline wind projects as a predictor of potential nocturnal migrant fatalities for the Proposed Action.' Once again, the authors have opted for convenience in place of accuracy. Once again, I say this is unacceptable! The Hopkins Wind site is different in terrain from the Proposed Site in Whitman County. We were told, by the Planner, that the 'EIS process will be very thorough.' Thus far, what I have found is that this EIS process is very 'wordy' and filled with 'excuses' for not doing the hard work to obtain accurate information."	To date, there have been no large incidents of migrating songbird fatalities at wind farms. Songbirds migrate across broad fronts and are not typically concentrated along any features.  Night migration surveys conducted at the Vansycle Ridge and Stateline wind projects in 2000-2001 found low rates of migration during the peak of passerine migration (Mabee and Cooper, 2002). Recently, results of marine radar surveys for proposed wind-energy facilities have indicated that the vast majority of nocturnal migrants fly at altitudes that do not put them at risk of collision with turbines (Young and Erickson, 2006). General research on bird migration has shown that most passerines (i.e. songbirds) fly at altitudes between 500 and 1,000 feet and nocturnal migrants tend to fly at higher elevations than species migrating during daylight hours (NPWRC, 2006)  Taken as a whole, for all these reasons The Wildlife Society, in a landmark publication on wind energy and wildlife,	DEIS Section 3.3.4.2, paragraph 3 under "Impacts to Avian Species" (page 3-36) will be revised as follows:  <i>The avian use information for the Proposed Action is based on detections of birds seen and/or heard calling. Because some birds (for example songbirds) are less vocal during fall, this information is skewed toward use during other seasons. Similarly, the levels of night migration for the Proposed Action are not known. However, a recent study of night migration fatalities at wind energy facilities found that only four multi-bird fatalities (that is, events with greater than three bird fatalities) were reported during 25,000 post-construction carcass searches at 30 operating wind farms in America, including eight farms in the west (Kerlinger et al., 2010).</i>  DEIS Section 3.3.4.2, paragraph 8 under "Impacts to Avian Species" (second paragraph on page 3-37) will be revised as follows:  <i>Nocturnal migrants and raptors (owls) are challenging to</i>

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						<p>concluded that fatalities of passerines from wind turbine strikes generally are not significant on a population-wide basis (Arnett et al., 2007. "Impacts of Wind Energy Facilities on Wildlife and Wildlife Habitat." <i>Wildlife Society Technical Review</i> 07-2. The Wildlife Society, Bethesda, Maryland.)</p> <p>The study plans meet the recommendations contained in the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009). WDFW staff reviewed and accepted the Biological Study Plan proposed.</p>	<p><u>survey in terms of mean use, as understood by professional ornithologists and amateur birders thus no nocturnal surveys were conducted for the Proposed Action. Night migration surveys conducted at the Vansycle Ridge and Stateline wind projects in 2000 (after construction)-2001 found low rates of migration during the peak of passerine migration (Mabee and Cooper, 2002). Recently, results of marine radar surveys for proposed wind-energy facilities have indicated that the vast majority of nocturnal migrants fly at altitudes that do not put them at risk of collision with turbines (Young and Erickson, 2006). In general, most passerines (i.e. songbirds) fly at altitudes between 500 and 1,000 feet and nocturnal migrants tend to fly at higher elevations than species migrating during daylight hours (NPWRC, 2006).</u></p> <p>The following references will be added to DEIS Section 4.4:</p> <p><u>Mabee, T.J. and B.A. Cooper. 2002. Nocturnal Bird Migration at the Stateline and Vansycle Wind Energy Projects, 2000-2001 Final Report. Prepared for CH2M HILL and FPL Energy Vansycle, LLC.</u></p> <p><u>Northern Prairie Wildlife Research Center (NPWRC). 2006. Migration of Birds: Migratory Flight Altitude. <a href="http://www.npwr.usgs.gov/resource/birds/migratio/altitude.htm">http://www.npwr.usgs.gov/resource/birds/migratio/altitude.htm</a></u></p> <p><u>Kerlinger, Paul, Joelle L. Gehring, Wallace P. Erickson, Richard Curry, Aaftab Jain, and John Guarnaccia. 2010. "Night Migrant Fatalities and Obstruction Lighting at Wind Turbines in North America." <i>The Wilson Journal of Ornithology</i> 122(4):744-754. December.</u></p> <p><u>Young, Jr., D.P. and W. P. Erickson. 2006. "Wildlife Issue Solutions: What Have Marine Radar Surveys Taught Us About Avian Risk Assessment?" <i>Proceedings of the American Wind Energy Association Windpower 2006 Conference and Exhibition, Pittsburgh, Pennsylvania, June 4-7, 2006.</i></u></p>
52 KIE-15	Avian Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	<p>"Another reason for the WDFW Wind Power Guidelines to be followed in this project area is the fact that only one (1) Sandhill Crane was spotted in the project area, when, in fact flocks migrate through that area, and if the surveyors actually spent any time in the area, they would know that. This project area is in the Eastern Pacific Flyway. There is also no mention of ring-necked pheasants or Partridges, both of which are found in the project area."</p>	<p>NWC did follow the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) (please refer to the response to Comment 49 [KIE-12]). We acknowledge on DEIS page ES-13 that the Proposed Action area is in the "eastern portion of the Pacific Flyway."</p> <p>Sandhill cranes may occasionally fly over the Proposed Action area. However, the Proposed Action area is located at the extreme eastern edge of the inland migration route for this species (Petruła and Rothe, 2005). The interior route passes through central Washington, with the primary stopping area being near Potholes Reservoir. No sizeable wetlands exist in or near the Proposed Action area that would attract migrating sandhill cranes.</p>	<p>DEIS Section 3.3.2.2, between paragraphs 3 and 4 (page 3-29), will include the following new paragraph:</p> <p><u>Many other species, such as ring-necked pheasant, gray partridge, and various owl species, may occur in the Proposed Action area, but they were not observed during the avian use surveys.</u></p> <p>DEIS Section 3.3.2.4 (page 3-29) will be changed as follows:</p> <ul style="list-style-type: none"> <li>• <b>Sandhill Crane.</b> <u>One Sandhill crane was observed during fall migration flying above the proposed rotor-swept area (RSA). Sandhill cranes may occasionally fly over the Proposed Action area. Using radio telemetry, researchers have documented two pathways used by the species during their southward migration from Alaska: a coastal route and an interior route (Petruła and Rothe, 2005). The interior route passes through central Washington, with the primary stopping area being near Potholes Reservoir and approximately 90 miles west of</u></li> </ul>

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							<p><u>the Proposed Action area. It is likely that the cranes stop in this area due to the proximity to water, is used primarily for roosting and loafing (Littlefield and Ivey, 2002). No sizeable wetlands exist in or near the Proposed Action area that would attract migrating sandhill cranes.</u></p> <p>DEIS Section 4.4 will include the following new references:</p> <p><u>Petrula, M. J. and T.C. Rothe. 2005. "Migration chronology, routes, and winter and summer range of Pacific Flyway Population of lesser sandhill cranes." Proceedings North American Crane Workshop. 9:53-68. <a href="http://www.wildlife.alaska.gov/index.cfm?adfg=waterfo/wl.crane">http://www.wildlife.alaska.gov/index.cfm?adfg=waterfo/wl.crane</a>.</u></p> <p><u>Littlefield, C. and G. Ivey. 2002. Sandhill Crane Recovery Plan. Prepared for Washington Department of Fish and Wildlife <a href="http://wdfw.wa.gov/publications/00396/wdfw00396.pdf">http://wdfw.wa.gov/publications/00396/wdfw00396.pdf</a>.</u></p>
<b>53 KIE-16</b>	Species Data	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	<p>"Another issue, is that the list of other 'general wildlife' in the area was based, not on an 'actual' survey of the area, but 'species that would be expected to occur in the survey area.' There was only one (1) species of owl noted, when, in fact pairs of Great-horned, Short-eared, Snowy and Burrowing owls have been seen in the project area. There was no mention of skunks or porcupines, both of which are also found in the survey area; however squirrels were listed, and are not found in the area. Two other major forms of wildlife that were not listed for the area were elk and moose, which are also found in the project area. (The moose calve in the area yearly and breed there, as well.)"</p>	<p>Field surveys were conducted for the Proposed Action area between August 2008 and August 2010, during which all wildlife observations were recorded. General wildlife observations were included on page 49 of DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010). There are likely other species that use the Proposed Action area that were not observed during the years that surveys were conducted; however, no survey method can be expected to detect 100 percent of the species present for every year. The field surveys followed accepted protocols. The purpose of the surveys was to represent site conditions, including wildlife that might occur based on observations. The surveys and analysis also focused more intensely on identifying the presence of protected species and habitats. The list of species that may occur in the general area (DEIS page 3-32) was intended to illustrate habitat conditions rather than to point out specific species occurrences in the Proposed Action area. This list is intended to give an idea of the type of habitat/species that may exist in the Proposed Action area. The comment is correct that California ground squirrels do not occur in the Proposed Action area. The WDFW PHS did not identify the Proposed Action area as big game range, but white-tailed and mule deer were observed during surveys, and other big game species may occur in the area at certain times of the year.</p>	<p>DEIS Section 3.3.2.6, paragraph 2 (page 3-32) will be revised as follows:</p> <p><u>Other general wildlife species that <del>would be expected to</del> may occur in the survey area include, but are not limited to coyote, American badger, raccoon (Procyon lotor), <del>California ground squirrel (Spermophilus beecheyi), northern grasshopper mouse (Onychomys leucogaster), California quail (Callipepla californica), barn owl (Tyto alba), yellow-rumped warbler (Dendroica coronata), lazuli bunting (Passerina amoena), house finch (Carpodacus mexicanus), western fence lizard (Sceloporus occidentalis), short-horned lizard (Phrynosoma douglassi), rainbow trout (Oncorhynchus mykiss), and sculpin (Cottus spp.).</del></u></p> <p><u>The WDFW PHS did not identify the Proposed Action area as a big game range, but white-tailed and mule deer were observed during surveys, and other big game species may occur in the area at certain times of the year.</u></p>
<b>54 KIE-17</b>	DEIS Analysis	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	<p>"This EIS is not at all what I expected. It is very 'boilerplate,' based on reports done in other unrelated locations, and therefore, very inaccurate relative to the actual Proposed Site."</p>	<p>Comment noted. The use of existing reports in a DEIS is permitted under Washington Administrative Code. WAC 197-11-402(7) states, "Agencies shall reduce paperwork and the accumulation of background data by adopting or incorporating by reference, existing, publicly available environmental documents, wherever possible." The documents this EIS referenced were chosen because the information they presented was relevant to the Proposed Action.</p> <p>Please refer to the response to Comment 44 (KIE-7).</p>	No change to the text required.

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<b>55</b> <b>KIE-18</b>	Avian Analysis	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"You cannot simply plug in species you 'feel' should be found in an area and 'call it good.' This calls into question the accuracy and veracity of the entire report. How can one trust the contents? Additionally, how can one quantify the potential effects on the avian population in the area, and the potential mortality statistics?"	Please refer to the responses to Comment 45 (KIE-8) and Comment 53 (KIE-16). Also, see DEIS Section 3.3.1.	No change to the text required.
<b>56</b> <b>KIE-19</b>	Bat Analysis	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Oddly, in the EIS section on mortality issues, there is much discussion of bat mortality and the statement 'no known collisions' of bats with turbine blades. My research indicates that collisions are not the problem with bats. Bats are affected by the sudden drop of blood pressure, after which their lungs burst, killing them. In some areas where wind farms have been constructed, bats have had very significant numbers of deaths. I find it disingenuous that the authors state 'no known collisions' when they are well aware that industrial turbines kill bats by the thousands due to pressure levels—not collisions."	The DEIS noted by reference the work performed to identify barotrauma as a potential mechanism by which bats are adversely affected by the operation of wind turbines.  New text will be added to state that other causes of bat mortality at wind energy facilities (i.e. barotrauma) continue to be researched by the scientific community and, for that reason, have not yet been incorporated into preconstruction bat risk assessment guidelines.	DEIS Section 3.3.4.2 (page 3-43) will be revised as follows:  <b>Impacts to Bats.</b> <i>Assessing the potential impacts of wind energy development to bats at in the proposed Facility Proposed Action area is complicated because the proximate and ultimate causes of bat fatalities at turbines range from collisions to are poorly understood events such as barotrauma (Kunz et al., 2007b; Baerwald et al., 2008; Cryan and Barclay, 2009), and because monitoring elusive, night-flying animals is inherently difficult (O'Shea et al., 2003). In addition, although installed capacity for wind energy has increased rapidly in recent years, the availability of results from studies at those projects has lagged, and therefore, the results are not available to inform studies at new projects (Kunz et al., 2007b)...</i>  DEIS Section 3.3.4.2/Impacts to Bats (page 3-44), paragraph 4 will include the following changes:  <i>No known collisions of federally endangered or threatened bat species have been documented in conjunction with wind turbines (NRC, 2007). Collisions involving other bat species are typically on the same order as expected for birds, with 3.4 bat kills/turbine/year (4.6 bats/MW/year) as the national average from the NWCC fact sheet (NWCC, 2004). However, much higher rates (15.3 to 41.1 bats/MW/year) were found during some studies in the Appalachian Mountains and at other locations in recent years (GAO, 2005; NRC, 2007). Since these data are based on the number of carcasses found during monitoring, they encompass all causes for mortality, including collisions or other effects. Bat mortality estimates have been made for 11 existing wind-energy facilities in the Pacific Northwest, where they have been lower than the national average, ranging from 0.23 to 2.46/MW/year, and averaged 1.20/MW/year (Johnson and Erickson 2010). It should be noted that recent findings surrounding other causes of bat mortality at wind energy facilities (such as barotrauma) continue to be researched by the scientific community and, for that reason, have not yet been incorporated into preconstruction bat risk assessment guidelines.</i>
<b>57</b> <b>KIE-20</b>	Giant Palouse Earthworm	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Section 3.3.4.1 Invertebrates - The Giant Palouse Earthworm's habitat has, according to this section, been identified as being present in very limited areas in the proposed construction site; therefore, because of the rarity of this invertebrate the Washington State University department studying it, as well as the Palouse Prairie Foundation, should be allowed 'on site' prior to excavation in order to determine whether or not this rare creature is indeed present, SINCE the authors of this EIS have not done any studies or made any determination that the Giant Palouse Earthworm is not present there."	The types of studies required to identify the presence of giant Palouse earthworm (GPE) include shovel probing and electroshocking, and often lead to the demise of the specimens when they are found. A recent petition by the Palouse Prairie Foundation to the U.S. Fish and Wildlife Service (USFWS) indicated that three of the last few reported individuals of this species have been inadvertently killed during research activities focused on reporting the rarity of its existence (CBD, 2006).	DEIS Section 3.3.1.1 (page 3-24), bullet 5 will be revised as follows:  <ul style="list-style-type: none"> <li>• <i>Giant Palouse earthworm desktop review. A desktop evaluation of the giant Palouse earthworm (GPE) (Driloleirus americanus) was conducted by CH2M HILL. The review included review of the species' range, distribution, conservation status, habitat requirements, and known occurrences near the Proposed Action area. No field survey was conducted for this species as no</i></li> </ul>

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					<p>The GPE is known to dwell in burrows up to 15 feet below the surface and is associated with Palouse Prairie grasslands that have not been disturbed. Unlike many other earthworms, they do not regularly visit the surface. As indicated in DEIS Section 3.2.6 (page 3-21), most remnant Palouse Prairie habitats are expected to be avoided. If avoidance is not fully possible, disturbance to these areas will be minimized, and the mitigation measures listed on DEIS pages 3-21 and 3-22 will be implemented. Avoidance and minimization of impacts to Palouse Prairie will also avoid and minimize impacts to the GPE if it were present.</p> <p>Remnant areas of Palouse Prairie within the Proposed Action area will be delineated prior to final site plan approval by Whitman County and impacts to Palouse Prairie habitat will be minimized to the greatest extent practicable, which will minimize impacts to the GPE. Methods previously used to survey for the giant Palouse earthworm can cause injury or mortality to the species and can severely impact the species' habitat.</p>	<p>The GPE is known to dwell in burrows up to 15 feet below the surface and is associated with Palouse Prairie grasslands that have not been disturbed. Unlike many other earthworms, they do not regularly visit the surface. As indicated in DEIS Section 3.2.6 (page 3-21), most remnant Palouse Prairie habitats are expected to be avoided. If avoidance is not fully possible, disturbance to these areas will be minimized, and the mitigation measures listed on DEIS pages 3-21 and 3-22 will be implemented. Avoidance and minimization of impacts to Palouse Prairie will also avoid and minimize impacts to the GPE if it were present.</p> <p>Remnant areas of Palouse Prairie within the Proposed Action area will be delineated prior to final site plan approval by Whitman County and impacts to Palouse Prairie habitat will be minimized to the greatest extent practicable, which will minimize impacts to the GPE. Methods previously used to survey for the giant Palouse earthworm can cause injury or mortality to the species and can severely impact the species' habitat.</p>	<p><del>survey protocol has been established.</del></p> <p>The last paragraph of DEIS Section 3.3.2.4 (page 3-31) will be changed as follows:</p> <p><i>Potentially suitable habitat for the GPE is present within the Proposed Action area in remnant areas of Palouse Prairie grassland that have not been disturbed by agricultural or other development activities. However, given the very limited and fragmented nature of the habitat together with the species' extreme rarity, it is unlikely this species is present in the Proposed Action area. Research indicates that small, discontinuous patches of higher quality habitats (for example, Palouse Prairie) have limited ability to support wildlife, particularly for less common species, due to edge effects (Johnson, 2001; Sauvajot, et al., 1998). Field surveys for the GPE were not conducted, in part, because methods used to survey for the species can cause injury or mortality to the species and can severely impact the species' habitat. A recent petition by the Palouse Prairie Foundation to the USFWS indicated that three of the last few reported individuals of this species have been inadvertently killed during research activities focused on reporting the rarity of its existence (CBD, 2006).</i></p> <p>DEIS Section 3.3.4.1, Invertebrates (page 3-35), will be revised to include the following text after last sentence:</p> <p><i>Unavoidable impacts to patches of potential GPE habitat (such as Palouse Prairie) will be minimized to the greatest extent practicable, which will minimize potential impacts to the GPE.</i></p> <p>DEIS Section 4.4 will include the following references:</p> <p><i>Johnson, D. 2001. Habitat fragmentation effects on birds in grasslands and wetlands: a critique of our knowledge. Great Plains Research 11(2): 211-231. Jamestown, ND, Northern Prairie Wildlife Research Center Online. <a href="http://www.npwr.usgs.gov/resource/birds/habfrag/index.htm">http://www.npwr.usgs.gov/resource/birds/habfrag/index.htm</a> [Version 21FEB2003]</i></p> <p><i>Sauvajot, R.M., M. Buechner, D. Kamradt, and C. Schonewald. 1998. Patterns of human disturbance and response by small mammals and birds in chaparral near urban development. Urban Ecosystems 2:279-297.</i></p>

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58 KIE-21	Avian Impacts	Wildlife	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"In the Section 3.3.6.2 Proposed Mitigation Measures for Avian and Bat Species -there is various discussion. One of the statements made is that 'the Facility is not expected to contribute substantially to declines in local avian or bat species because the annual number of fatalities would be small and spread among various species.' Isn't any mortality a contribution? What is substantial? This Facility, which does not currently exist and does not currently cause harm or death to birds or bats, when once built and operational, will cause deaths to birds and bats. That makes it significant, if not substantial."	<p>Predictions of mortality rates for avian and bat species are conducted based on best available science and similar projects in the area.</p> <p>The surveys that were performed on the site are all consistent with the WDFW's <i>Wind Power Guidelines</i> (WDFW, 2009). The protocols applied to the surveys themselves are widely accepted within this scientific field. It is appropriate to apply standard protocols and methodologies in order to gather the baseline data.</p> <p>Historically, this approach to conducting predictive modeling of mortality using on-site baseline data indicates that mortality trends at area wind projects do not tend to vary greatly from what is anticipated. Based on the information available, some impacts to birds and bats may occur; however, no probable significant adverse impacts will occur to these species on a population-wide basis.</p>	No change to the text required.
59 KIE-22	Technical Advisory Committee	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Nowhere in this section is there mention of a Technical Advisory Committee (TAC). I do not know of a Facility in the Northwest that does not have a TAC. This Facility should have a TAC in order to fairly assess problems, make corrections, and minimize impacts to avian and bat populations. Other developers have agreed to have TACs. What is First Wind's (Palouse Wind) rationale for omitting this form of mitigation? I understand there are others in the County who want a TAC for this project and Avian Biologist Mike Denny suggests that this should be done. I look with suspicion on any developer who is not open and transparent about day-to-day operations, especially when it concerns wildlife mortalities, which will certainly occur."	WCC Chapter 19.61, Commercial Wind Energy Facilities, does not require the establishment of a Technical Advisory Committee (TAC). WCC 19.61.060(8)(f) ensures that monitoring data be collected for a minimum of 1 year following Proposed Action start-up to estimate bird and bat fatality rates, and that bird fatalities observed be reported to WDFW and USFWS on a quarterly basis for the life of the Proposed Action unless and until these wildlife agencies waive or reduce this reporting requirement. Palouse Wind will establish a TAC for this project.	DEIS Section 3.3.6.2 (page 3-46) will include the following mitigation measure: <ul style="list-style-type: none"> <li>• <u>Palouse Wind will establish a Technical Advisory Committee (TAC) by the time commercial operations of the Proposed Action commence in order to examine the results related to avian and bat monitoring data and to make recommendations to Whitman County on monitoring and adaptive management-measures. The TAC shall include representatives from Whitman County. Representatives from WDFW and USFWS, as well as landowners and other avian-interested stakeholders will be invited to participate in the TAC as appropriate.</u></li> </ul>
60 KIE-23	Decommissioning	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"There is nothing mentioned in this report about the developer setting aside at least a percentage of the cost for decommissioning. In light of the extremely tenuous financial condition of First Wind (aka Palouse Wind) there should be a set-aside for decommissioning in the event of insolvency, which is a distinctly possible situation."	WCC 19.61.060(14)(a) establishes the requirements for providing financial security to ensure proper decommissioning of Proposed Action facilities, as follows: "A bond, letter of credit, or other security acceptable to the County is required to ensure proper decommissioning of each turbine and other equipment. The amount of the security shall be determined based on the site-specific conditions affecting the costs of decommissioning, access, depth of foundation, terrain, etc., to include credit for salvage value of the equipment. The timing for supplying the security shall be determined in consultation with the County. If, however, the Facility is owned and operated by an investor-owned electric utility regulated by the Washington Utility and Transportation Commission, such security device as described in this condition may be waived and the removal and restoration obligations hereunder shall be a general obligation of the investor-owned utility." The CUP, if issued, would require Palouse Wind, or any future owner, to abide by these requirements.	No change to the text required.

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<b>61</b> <b>KIE-24</b>	Wind Turbine Syndrome	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"In the DEIS there is mention of Dr. Nina Pierpont. The authors dismiss Pierpont's <i>Wind Turbine Syndrome</i> report because it has been commercially published (page 3-192). The fact that a scientific report can be commercially published should alert an inquisitive mind to the realization that something of importance is present. There is a reason that so many people are willing to pay \$18 for the peer reviewed scientific report <i>Wind Turbine Syndrome</i> . That reason is that industrial wind turbines pollute the environment with high levels of low frequency sound waves, which create adverse health effects for nearby residents. An environmental impact statement that brushes off a serious threat to the public health, instead of examining the issue, is a fraud."	Comment noted. It is stated on DEIS page 3-192 that Dr. Pierpont's hypotheses have not been broadly accepted and that independent reviews have not reached similar conclusions.  Additionally, please refer to the response to Comment 14 (WHI-9).	No change to the text required.
<b>62</b> <b>KIE-25</b>	American and Canadian Wind Energy Associations	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"As part of the 'brush off' the DEIS cites 'the American and Canadian Wind Energy Associations' which established a 'panel of international experts' to review 'the assertion that sounds from wind turbines could lead to direct health effects.' Naturally, they do not support those assertions. I might give more weight to those findings if they were not solicited and paid for by the wind energy developers, who seek a particular outcome; usually getting what they pay for."	DEIS page 3-197 discusses the conclusions reached by independent public health agencies, as well as the American Wind Energy Association and Canadian Wind Energy Association (AWEA/CanWEA) Study (Colby et al., 2009).	No change to the text required.
<b>63</b> <b>KIE-26</b>	Noise Research	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I would like to refer to <i>Public Health Impacts of Wind Turbines</i> prepared by Minnesota Department of Health, Environmental Health Division, in response to a request from Minnesota Department of Commerce, Office of Energy Security, May 22, 2009. (My e-mail submission will have the pdf of the study in its entirety.)"	Comment noted. The referenced report identifies a regulatory standard of 50 A-weighted decibels (dBA). It also identifies similar conclusions as those reached by the Chief Medical Officer of Ontario, which are discussed on DEIS page 3-192. These conclusions note that community attitudes toward a project are important factors. The referenced report also identifies that an individual's sensitivity to sound is variable. It should be noted that the referenced report was issued prior to reports by the Chief Medical Officer of Ontario and the AWEA/CanWEA, which are discussed in the DEIS. As noted above, these reports reach similar conclusions regarding the variability in response to sound.	No change to the text required.
<b>64</b> <b>KIE-27</b>	Low Frequency Noise	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Wind turbines generate a broad spectrum of low-intensity noise. At typical setback distances higher frequencies are attenuate. In addition, walls and windows of homes attenuate high frequencies, but their effect on low frequencies is limited."	Comment noted. Please refer to the responses to Comment 63 (KIE-26), Comment 6 (WHI-1), and Comment 9 (WHI-4). The potential for disturbance is discussed in the DEIS; see DEIS page 3-197 in reference to this comment and to Comment 65 (KIE-28).	No change to the text required.
<b>65</b> <b>KIE-28</b>	Low Frequency Noise	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Low frequency noise is primarily a problem that may affect some people in their homes, especially at night. It is not generally a problem for businesses, public buildings, or for people outdoors. The most common complaint in various studies of wind turbine effects on people is annoyance complaints...Complaints appear to rise with increasing outside noise levels above 35dB(A)."	Please refer to the responses to Comment 9 (WHI-4) and Comment 64 (KIE-27).	No change to the text required.
<b>66</b> <b>KIE-29</b>	Health Impacts	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"It has been hypothesized that direct activation of the vestibular and autonomic nervous system may be responsible for less common complaints but evidence is scant."	Comment noted. Please refer to the responses to Comment 62 (KIE-25) and Comment 64 (KIE-27). The DEIS references the Chief Medical Officer of Ontario and the AWEA/CanWEA review of these hypothesis. Their conclusions are cited on pages 3-192 and 3-197 of the DEIS.	No change to the text required.
<b>67</b> <b>KIE-30</b>	Noise Impacts	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"This DEIS does not talk about the 'Project Area' and the fact that the ambient sound is very quiet there. The quiet is one of the main reasons residents enjoy their country homes."	DEIS pages 3-186 and 3-187 discuss the Affected Environment, which includes the Proposed Action area.	No change to the text required.

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<b>68</b> <b>KIE-31</b>	Noise Studies	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I was under the impression that sound studies would be done in the area where the project is proposed."	Noise modeling has been conducted for the Proposed Action area as discussed on DEIS page 3-191. This results of this modeling are shown on Figure 3.15-1 of the DEIS Addendum. DEIS page 3-198 identifies that additional noise modeling of the final Facility will be conducted.  Please refer to the responses to Comment 129 (GIB-9), Comment 130 (GIB-10), and Comment 165 (HOC-6).	No change to the text required.
<b>69</b> <b>KIE-32</b>	Echoes	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"There are 'echoes' in the area surrounding the ridges targeted for development. This condition is likely to cause the sound to be amplified and thus make it 'louder' and more intrusive to residents."	Comment noted. The Proposed Action facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.  A noise source reflected off a wall could result in some increase in decibel level. For example, a perfect reflection would result in a 3-dBA increase (i.e., as if there were two sources of the same level, 40 dBA direct + 40 dBA reflected = 43 dBA overall). However, perfect reflections do not exist when evaluating vertical hard concrete noise walls used along highways and would also not exist in sloping, grass-covered terrain, as is characteristic of the Proposed Action site. Therefore, any expected increase in noise level from a single source due to reflection will be less than 3 dBA.	No change to the text required.
<b>70</b> <b>KIE-33</b>	Noise Studies	Noise	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"(I would also suggest a review of the <i>Audiology Today</i> July/August, 2010 issue that features wind turbine sound and health effects, which has previously been submitted to the County.)"	DEIS page 3-197 discusses the referenced article.	No change to the text required.
<b>71</b> <b>KIE-34</b>	Financial Feasibility of Wind Energy	Socioeconomics	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"Industrial wind has never been a financially viable form for energy production and likely never will be."	Comment noted.	No change to the text required.
<b>72</b> <b>KIE-35</b>	DEIS Content	General	Carolyn Kiesz Thornton, WA 99111	Dec. 15, 2010	"I expected true numerical computations based on actual findings from 'real surveys' from the Project Area. That is not what this report represents. What a monumental disappointment."	Comment noted. Field surveys were in fact completed for the DEIS. Please refer to the responses to Comment 48 (KIE-11), Comment 49 (KIE-12), Comment 68 (KIE-31), and Comment 205 (PPF-2).	No change to the text required.
<b>73</b> <b>WDOE-1</b>	Erosion and Sediment Control	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205-1295	Dec. 15, 2010	"Proper erosion and sediment control practices must be used on the construction site and adjacent areas to prevent upland sediments from entering surface water. Local stormwater ordinances will provide specific requirements. Also refer to the Stormwater Management Manual for Eastern Washington ( <a href="http://www.ecy.wa.gov/programs/wq/stormwater/eastern_manual/manual.html">http://www.ecy.wa.gov/programs/wq/stormwater/eastern_manual/manual.html</a> ). All ground disturbed by construction activities must be stabilized. When appropriate, use native vegetation typical of the site."	Comment noted. As stated in DEIS Section 3.6.6.1 (page 3-83 to 3-84), Palouse Wind will apply for National Pollutant Discharge Elimination System (NPDES) coverage under the Washington Department of Ecology's General Construction Stormwater Discharge Permit. The DEIS also states that a site-specific Stormwater Pollution Prevention Plan (SWPPP) will be prepared which will outline the erosion and sediment control Best Management Practices (BMPs) that will be implemented during construction of the Facility. BMPs will be selected to minimize erosion and prevent sediment from entering surface water bodies. All ground disturbances will be stabilized prior to closing the permit.	The following text has been added to DEIS Section 3.6.6.1 (page 3-84):  <i>The Proposed Action site will be monitored for erosion and corrective actions taken as required by the Facility's NPDES permit requirements. All ground disturbances will be stabilized prior to closing the permit.</i>
<b>74</b> <b>WDOE-2</b>	Stormwater Discharge	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205-1295	Dec. 15, 2010	"Any operation which would generate a waste discharge or have the potential to impact the quality of state waters, must receive specific prior authorization from the Department of Ecology as provided under Chapter 90.48 RCW, Chapter 173-216 WAC, Chapter 173-220 WAC, Chapter 173-200 WAC and Chapter 173-201A WAC."	Comment noted. The Facility will not generate process waste that could be discharged into water bodies of the State. A Spill Prevention, Control, and Countermeasures (SPCC) plan will be prepared to guide operational practices for storing and handling bulk materials to prevent impacts to surface water bodies of the State.	No change to the text required.

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<b>75</b> <b>WDOE-3</b>	Erosion and Sediment Control	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205- 1295	Dec. 15, 2010	"Routine inspections and maintenance of all erosion and sediment control Best Management Practices (BMPs) are recommended both during and after development of the site."	Comment noted. The Facility will obtain and comply with the Washington Department of Ecology's General Construction Stormwater Discharge Permit. As part of this permit, inspection and maintenance of all installed BMPs is required.	No change to the text required.
<b>76</b> <b>WDOE-4</b>	Erosion and Sediment Control	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205- 1295	Dec. 15, 2010	"A Stormwater Pollution Prevention Plan for the project site may be required and should be developed by a qualified person(s). Erosion and sediment control measures in the plan must be implemented prior to any clearing, grading, or construction. These control measures must be effective to prevent soil from being carried into surface water by stormwater runoff. Sand, silt, and soil can damage aquatic habitat and are considered pollutants. The plan must be upgraded as necessary during the construction period."	Comment noted. A site-specific SWPPP will be prepared that will outline the erosion and sediment control BMPs that will be implemented during construction of the Facility. BMPs will be selected to minimize erosion and prevent sediment from entering surface water bodies. The SWPPP will be prepared by a knowledgeable and qualified individual.	No change to the text required.
<b>77</b> <b>WDOE-5</b>	Stormwater Drainage	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205- 1295	Dec. 15, 2010	"Proper disposal of construction debris must be in such a manner that debris cannot enter the natural stormwater drainage system or cause water quality degradation of surface waters. Dumpsters and refuse collection containers shall be durable, corrosion resistant, nonabsorbent, nonleaking, and have close fitting covers. If spillage or leakage does occur, the waste shall be picked up immediately and returned to the container and the area properly cleaned."	Comment noted. The site-specific SWPPP will incorporate good housekeeping BMPs, including proper waste management and collection to prevent debris, spill, and leaks from entering enter water bodies of the State or causing adverse effects to water quality in receiving drainages.	No change to the text required.
<b>78</b> <b>WDOE-6</b>	Stormwater Discharge	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205- 1295	Dec. 15, 2010	"The operator of a construction site that disturbs one acre or more of total land area, and which has or will have a discharge of stormwater to a surface water or to a storm sewer, must apply for coverage under Department of Ecology's Construction Stormwater General Permit. Owners of sites where less than one acre of total land area will be disturbed must also apply if the construction activity is part of a larger plan of development or sale in which more than one acre will eventually be disturbed. Discharge of stormwater from such sites without a permit is illegal and subject to enforcement action by the Department of Ecology. Application should be made at least 60 days prior to commencement of construction activities. A permit application and related documents are available online at:  <a href="http://www.ecy.wa.gov/programs/wq/stormwater/construction">http://www.ecy.wa.gov/programs/wq/stormwater/construction</a> or by contacting the Water Quality program, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600; (360) 407-6401."	Comment noted. Palouse Wind will apply for NPDES coverage under the Washington Department of Ecology's General Construction Stormwater Discharge Permit.	No change to the text required.
<b>79</b> <b>WDOE-7</b>	Other Authorizations	Water Resources	Terri Costello Washington Department of Ecology Spokane, WA 99205- 1295	Dec. 15, 2010	"Ecology's comments are based upon the information submitted for review. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action."	Comment noted.	No change to the text required.

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<b>80</b> <b>WWCC-1</b>	Supports Project	General	Janet V. Danley Director, Clarkston Campus Walla Walla Community College Clarkston, WA 99403	Dec. 15, 2010	"Walla Walla Community College has been supportive of and in a close working relationship with several large wind farm projects in Columbia and Garfield Counties, including the Lower Snake River Wind Farm Project (with over 800 planned wind turbines in Garfield and Columbia Counties) currently under construction in Garfield County. Walla Walla Community College support studies that have shown that wind farm projects have significant and varied positive impacts on the communities and counties in which they are constructed and operated."	Comment noted.	No change to the text required.
<b>81</b> <b>WWCC-2</b>	Economic Impacts	Socioeconomics	Janet V. Danley Director, Clarkston Campus Walla Walla Community College Clarkston, WA 99403	Dec. 15, 2010	"The economic impacts, including jobs, taxes, and economic diversification, will be substantial. It is during times, such as the current economic recession we are in, when rural communities throughout the U.S. struggle to not only compete for economic development, but simply survive."	Comment noted.	No change to the text required.
<b>82</b> <b>WWCC-3</b>	Economic Impacts	Land Use and Agriculture / Socioeconomics	Janet V. Danley Director, Clarkston Campus Walla Walla Community College Clarkston, WA 99403	Dec. 15, 2010	"Wind farm projects, such as Palouse Wind, provide farmers and other landowners, another income stream that enables them to diversify and pass on their holdings to their children and future generations."	Comment noted.	No change to the text required.
<b>83</b> <b>WWCC-4</b>	DEIS Analysis	General	Janet V. Danley Director, Clarkston Campus Walla Walla Community College Clarkston, WA 99403	Dec. 15, 2010	"We believe the Draft EIS has thoroughly addressed the environmental impacts to vegetation, wildlife, and water, and provided adequate mitigation plans to these impacts. In summary, Walla Walla Community College believes the DEIS is complete and acceptable, and that the Palouse Wind Project EIS should be accepted and approved."	Comment noted.	No change to the text required.
<b>84</b> <b>CRO-1</b>	Supports Project	Socioeconomic	Robert M. Crow Oakesdale, WA 99158	Dec. 16, 2010	Support postcard: "Palouse Wind has the great potential for economic development for Whitman County and Eastern Washington"	Comment noted.	No change to the text required.
<b>85</b> <b>DEG-1</b>	Supports Project	Socioeconomics/ Public Services and Utilities	Steve and Mary DeGon Oakesdale, WA 99158	Dec. 16, 2010	Support postcard: "The DEIS demonstrated that the project will have minimal impacts and our schools will benefit from the increased tax revenues."	Comment noted.	No change to the text required.
<b>86</b> <b>WNPS-1</b>	Wetland Avoidance	Wetlands and Surface Waters	Laura B. Maier Washington Native Plant Society Walla Walla, WA 99362	Dec. 16, 2010	"The Walla Walla subchapter of the Washington Native Plant Society urges you to protect any wetlands (4 are located within the area of impact, including a vernal pool) and any and all Washington state endangered, sensitive, and threatened plant species (1 of each)."	Turbines and other supporting facilities such as roads will be sited to avoid jurisdictional wetlands to the greatest extent possible. Work in wetlands, and mitigation for wetlands losses if necessary, will be conducted in accordance with applicable local, state, and federal requirements. Any potential disturbances to wetlands for the Proposed Action will be short-term during construction and/or will be related to collector line installation, road crossings, and associated culvert installation.	No change to the text required.
<b>87</b> <b>WNPS-2</b>	Palouse Prairie Avoidance	Vegetation	Laura B. Maier Washington Native Plant Society Walla Walla, WA 99362	Dec. 16, 2010	"Please protect any remnants of Palouse Prairie, including some where turbines are planned to be constructed. These natural areas cannot be re-created; we must not lose them."	Final layout of the Proposed Action will include micro-siting to avoid impacts, including impacts to special status plant populations, including Palouse Prairie remnants, to the maximum extent possible. Palouse Wind will coordinate with WDFW and the Palouse Prairie Foundation to develop avoidance and mitigation measures for Palouse Prairie habitat.  Additionally, the mitigation measures contained in DEIS	DEIS Section 3.2.6 (page 3-22), bullets 2, 3, and 5 will be revised as follows:  <ul style="list-style-type: none"> <li>• <i>Areas of identified <del>rare</del> special status species plant populations and areas of Palouse Prairie habitat will be marked or flagged prior to construction final site plan approval by Whitman County and avoided to the extent possible during construction...</i></li> <li>• <i>Micro-siting will be implemented such that slight</i></li> </ul>

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						Section 3.2.6 have been revised as indicated.	<p><del>relocations of <u>Project-Proposed Action</u> facilities may be made to avoid <u>rare special status species</u> plant populations and <u>Palouse Prairie habitat</u> if encountered during construction</del></p> <ul style="list-style-type: none"> <li>• <u>Palouse Wind will implement habitat mitigation actions in accordance with the Wind Power Guidelines (WDFW, 2009) for disturbance in natural habitats. Palouse Wind will consult with Whitman County, WDFW, and the Palouse Prairie Foundation regarding mitigation actions proposed for impacts to areas of Palouse Prairie habitat (native grasslands). Palouse Wind shall document consultation before final site plan approval.</u></li> </ul> <p>DEIS Section 3.2.6, paragraph 2 and bullets 1-3 (page 3-22) will be revised as follows:</p> <p><del>If avoidance or minimization of impacts to <u>protected vegetation or protected plant species special status plant populations</u> is not possible, mitigation measures specific to the <u>vegetation communities or plant species those special status plant populations</u> will be developed in coordination with the appropriate local, state, and federal regulatory agencies. Mitigation measures <del>may</del> <u>would</u> include <u>one or more of the following as appropriate:</u></del></p> <ul style="list-style-type: none"> <li>• <del>Removal, conservation, and replanting of protected individuals.</del></li> <li>• <del>Replanting of areas temporarily disturbed by construction activities with seed obtained from a qualified cultivator of rare plants</del></li> <li>• <del>Seeding of additional approved areas(s) with the same species.</del></li> <li>• <u>If restoration activities are proposed for impacts to Palouse Prairie habitat, following scientifically based or established guidelines such as the Native Palouse Prairie Restoration (CP-25) Plantings (Stannard, 2003; Skinner, 2005)</u></li> <li>• <u>When revegetation is proposed for areas temporarily disturbed by construction activities, select seed mixes appropriate to the pre-existing vegetation being restored; seed mixes will be weed free and obtained from a qualified cultivator</u></li> <li>• <u>Select restoration measures that would have a reasonable rate of success should habitat restoration be chosen as a means of mitigation</u></li> </ul> <p>DEIS Section 4.3 will include the following references:</p> <p><u>Stannard, M.E. 2003. Native Palouse Prairie Restoration (CP-25) Plantings. Washington State NRCS, Spokane WA. 2003. 5p. (ID# 5087).</u></p> <p><u>Skinner, D., B. Weddell, and M.E. Stannard. 2005. Palouse Prairie Restoration. <a href="http://www.wsu.edu/pmc_nrcs/Docs/Palouse_Prairie_Restoration_Brochure_Final.pdf">http://www.wsu.edu/pmc_nrcs/Docs/Palouse_Prairie_Restoration_Brochure_Final.pdf</a> Sept. 2005. 13p. (ID# 6206).</u></p>

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<b>88</b> <b>HAN-1</b>	Historic Wind Use	Land Use and Agriculture	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"When making your decision on this matter, we respectfully ask you to consider the history of the Palouse, or for that matter, agriculture as a whole. You will clearly see wind power is not unfamiliar or new to the ag-sector. Wind has been harnessed successfully for centuries, by all cultures."	Comment noted.	No change to the text required.
<b>89</b> <b>HAN-2</b>	Energy Diversification	Land Use and Agriculture	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"Most of the gains in agricultural productivity over my life time have come with an 'energy price tag'. The agricultural sector cannot and will not feed the world, if we do not find a solution; this energy equation."	Comment noted.	No change to the text required.
<b>90</b> <b>HAN-3</b>	Relationship to Agriculture	Land Use and Agriculture	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"why would we in agriculture turn a blind eye to an energy source that has served us for centuries?"	Comment noted.	No change to the text required.
<b>91</b> <b>HAN-4</b>	Economic Diversity	Socioeconomics	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"Now we have an opportunity to again benefit from it. Not just as individuals this time, but as a community. Wind projects bring much needed economic diversity to this region. The jobs, tax base, income and energy from this project are desperately needed. Each kilowatt generated by the wind is one that does not need to be generated by oil or gas. The world needs portable energy (oil). Agriculture needs energy. It is the efficiency of such energy that fanning demands. I am also sure; I need not point out the main feed stock for anhydrous ammonia is natural gas. Again each K.W. generated by wind frees up more natural gas, for fertilizer production and more oil (fuel) for our equipment."	Comment noted.	No change to the text required.
<b>92</b> <b>HAN-5</b>	Benefit to Agriculture	Land Use and Agriculture	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"In short, the term wind power will free up energy for ag-production. In the future the wind may provide hydrogen as a form of 'portable energy' for the ag-sector and the world. At this time, wind power can help to lengthen the amount of time we as farmers can continue to feed the world using present terms and conditions of production."	Comment noted.	No change to the text required.
<b>93</b> <b>HAN-6</b>	Public Comments	General	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"My last point is to do with the effects of this project on our neighbors. It has been said at public meetings that we must not have this project because the wind power may cause distress to our neighbors."	Comment noted. Please refer to the responses to Comment 6 (WHI-1) and Comment 17 (WHI-12).	Please refer to the revisions based on the response to Comment 6 (WHI-1).
<b>94</b> <b>HAN-7</b>	Turbine Appearance	Visual and Aesthetics	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"Another point that is often brought up is how windmills look. We have all heard beauty is in the eye of the beholder. I find the windmills very pleasant to look at. Who is to say that in the future people won't travel thousands of miles to look at them as they do the windmills in the Netherlands? What was the reaction of the neighbors to that first windmill in Holland? Who could anyone [sic] have seen the impact it had on the area."	Comment noted.	No change to the text required.

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<b>95</b> <b>HAN-8</b>	Best Economic Use	Socioeconomics	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"Does it really serve our communities interest to limit the 'best economic use' of private property? Should we base that decision on objections of a few individuals? If we did, how would we ever place a new road, power line, water line or dam anywhere in the country? If private property rights are crushed based on opinions of a few, how long before we will be restricted from growing individual crops, because the neighbor is allergic to the pollen? How long before I can't drive on a gravel road because it creates too much dust. Where does this end. The best economic use of our private property is the base of our economy. It is certainly the base our agricultural community. If we cannot find the will to proceed with this project, with all the good it can do, what can we do?"	Comment noted.	No change to the text required.
<b>96</b> <b>HAN-9</b>	Supports Project	General	Karen Hanson Oakesdale, WA 99158	Dec. 17, 2010	"I am fully supportive of this project, I see it as a 'win' for agriculture, the community, and ultimately for the nation."	Comment noted.	No change to the text required.
<b>97</b> <b>CAR-1</b>	Supports Project	General	Chris Carlson Spokane, WA 99223	Dec. 17, 2010	Support postcard: "Full speed ahead – future energy needs are 'blowin' in the wind'."	Comment noted.	No change to the text required.
<b>98</b> <b>FUN-1</b>	Supports Project	General	Lena Funston Nine Mile Falls, WA 99026	Dec. 17, 2010	Support postcard: "Please support the draft EIS for Palouse Wind. Reduce dependence on foreign oil"	Comment noted.	No change to the text required.
<b>99</b> <b>JAM-1</b>	Supports Project	General	Hollis Jamison Garfield, WA 99130	Dec. 17, 2010	Support postcard: "Windmills will increase jobs, generate needed county tax revenue, put some new families in the County to maintain them, and put more students in the small town schools. It would be a new industry in Whitman County. Win win situation!"	Comment noted.	No change to the text required.
<b>100</b> <b>OAK-1</b>	Energy Diversification	Energy and Natural Resources	Dennis Palmer Mayor, Town of Oakesdale, WA 99158	Dec. 17, 2010	"Approving the DEIS will allow Whitman County to contribute to the energy demand solution as opposed to just being part of the problem"	Comment noted.	No change to the text required.
<b>101</b> <b>OAK-2</b>	Job Creation	Socioeconomics	Dennis Palmer Mayor, Town of Oakesdale, WA 99158	Dec. 17, 2010	"The project will add substantial tax revenue to the area and will create job opportunities. The project is expected to employ over 160 construction jobs and 18 operation jobs that will be a positive impact on our local communities and boost local economy without adversely affecting housing, recreation and public resources. The DEIS clearly explains the socioeconomic benefits to our area for this project."	Comment noted.	No change to the text required.
<b>102</b> <b>OAK-3</b>	Safety	Health and Safety	Dennis Palmer Mayor, Town of Oakesdale, WA 99158	Dec. 17, 2010	"The DEIS also demonstrates that facilities of this nature can be constructed and operated in such a manner that it is safe to both employees and surrounding population as a whole. The project will adhere to setbacks required by Whitman County Code for commercial wind energy facilities. The DEIS correctly concludes that health and safety impacts will be properly minimized and mitigated."	Comment noted.	No change to the text required.
<b>103</b> <b>WEB-1</b>	Supports Project	General	Jared Webley (no contact info provided)	Dec. 17, 2010	"I would like to see the county avoid any delay in approving the Draft Environmental Impact Statement (DEIS)."	Comment noted.	No change to the text required.

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<b>104</b> <b>WEB-2</b>	Tax Revenue	Socioeconomics	Jared Webley (no contact info provided)	Dec. 17, 2010	"The tax revenue that the Palouse Wind project will generate during the construction and operations phases of the project will be substantial. According to the DEIS, Whitman County will receive approximately \$780,000 per year through property tax revenue. Almost 70% of this will go to area schools. This will be revenue that lowers tax burden on us and other Whitman County residents; it will allow us to make capital improvements to our schools, and will enhance County services."	Comment noted.	No change to the text required.
<b>105</b> <b>WEB-3</b>	DEIS Analysis	General	Jared Webley (no contact info provided)	Dec. 17, 2010	"I have reviewed the DEIS. It thoroughly takes into account the environmental, economic, and social impacts that the Palouse Wind project will have to the areas required to be reviewed by SEPA."	Comment noted.	No change to the text required.
<b>106</b> <b>WEB-4</b>	Energy Diversification	Energy and Natural Resources	Jared Webley (no contact info provided)	Dec. 17, 2010	"The Palouse Wind project will offer an opportunity for Whitman County to participate in the national and state trend of generating electricity from an abundant, clean, and renewable natural resource. Let's be part of the future - not let it pass us by."	Comment noted.	No change to the text required.
<b>107</b> <b>AVI-1</b>	Transmission Line Connection	Public Services and Utilities	Paul J. Kimmell Avista Utilities Spokane, WA 3727	Dec. 20, 2010	"Please note that all customers who wish to connect to and utilize Avista's transmission system are required to submit such requests pursuant to procedures established by the Federal Energy Regulatory Commission (FERC). In responding to these requests, Avista is required to follow a specific process set forth by FERC. Additional information regarding this process can be found at:  <a href="http://www.avistautilities.com/inside/resources/pages/transmissionservices.aspx">http://www.avistautilities.com/inside/resources/pages/transmissionservices.aspx</a>  Palouse Wind, LLC and Avista are currently engaged in this interconnection process and the interconnection facilities identified therein have been appropriately referenced in the DEIS."	Comment noted.	No change to the text required.
<b>108</b> <b>CAS-1</b>	DEIS Process	General	Tom Casey La Center, WA 96629	Dec. 20, 2010	"While attending various meetings and open houses with the First Wind staff in Oakesdale, it is apparent to me that they have been very responsive to the needs of the community and stewardship of the culture and environment for this project"	Comment noted.	No change to the text required.
<b>109</b> <b>CAS-2</b>	DEIS Analysis	General	Tom Casey La Center, WA 96629	Dec. 20, 2010	"From all the information that I read in the DEIS, I feel that First Wind has addressed any and all issues and appear to have done full due diligence in completing and making this report available for comment."	Comment noted.	No change to the text required.
<b>110</b> <b>CCT-1</b>	Project Location	Cultural Resources	Camille Pleasants Confederated Tribe of the Colville Reservation Nespelem, WA 99155	Dec. 20, 2010	"Please be advised that the proposed undertaking lies within the traditional territory of the Palus Tribe, one of the twelve tribes that make up the Confederated Tribes of the Colville Reservation (also known as the Colville Confederated Tribes or CCT)."	Comment noted. DEIS Section 3.8.2.1, paragraph 1, sentence 1 (page 3-97) recognizes this fact:  "The Project Area lies in the region traditionally associated with the Palouse (Palus)."	DEIS Section 3.8.2.1, paragraph 1, sentence 1 (page 3-97) will be revised as follows:  <i>The SEPA Study area Proposed Action boundary lies in the region traditionally associated with the Palouse (Palus), one of the 12 tribes that make up the Confederated Tribes of the Colville Reservation (also known as the Colville Confederated Tribes or CCT), Nez Perce, Coeur d'Alene, and Spokane tribes Tribes."</i>
<b>111</b> <b>CCT-2</b>	Culturally Important Plants	Cultural Resources/ Vegetation	Camille Pleasants Confederated Tribe of the Colville Reservation Nespelem, WA 99155	Dec. 20, 2010	"The EIS does not consider culturally important plants within the cultural resources sections. The Vegetation sections specifically state that there are areas within the project area that are still native perennial grasslands. These places are likely to contain culturally important plants, such as <i>Lomatium</i> sp., camas, and balsamroot as well as others. The EIS should clearly state how	Comment noted. The <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011)(page 10, paragraph 5) recognizes the cultural importance of plants:  "Plant resources also played an important role in diet and the	DEIS Section 3.8.2.1, paragraph 2 (page 3-97), will revised as follows:  <i>The Palouse. At Euro-American contact the Palouse territory stretched from the between the confluences of the Snake and Columbia rivers (present day Richland,</i>

**TABLE 1-1**  
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Comment Number	Issues Raised	EIS Category	Commenter	Date Comment Received	Comments	Response to Comment	Documents and Pages in which Comment is Addressed
					the undertaking will affect culturally important plants.”	annual round. Camas and other roots were gathered in the region between Pullman, Washington and Moscow, Idaho (Trafzer and Scheurman, 1986).”  Additionally, DEIS Section 3.8.2.1 has been revised to incorporate this information.	<i>Washington) to the confluence of the Snake and Clearwater rivers (present day Lewiston, Idaho). Linguistically, the Palouse are part of the Sahaptian family that also includes the Nez Perce. Plant resources also played an important role in the Tribe’s diet, cultural activities, and the annual round. Camas and other roots were gathered in the region between Pullman, Washington, and Moscow, Idaho (Trafzer and Scheurman, 1986). Note that camas was not observed during plant surveys conducted for the Proposed Action. However, Lomatium sp. plants and balsamroot, two other culturally significant plants, were observed in the area. These species are found in native perennial grasslands.</i>  DEIS Section 4.9 will include the following reference:  <u>Trafzer, Clifford E. and Richard D. Scheurman. 1986. Renegade Tribe: The Palouse Indians and the Invasion of the Inland Pacific Northwest. Washington State University Press, Pullman, WA.</u>
<b>112 CCT-3</b>	Traditional Cultural Places	Cultural Resources	Camille Pleasants Confederated Tribe of the Colville Reservation Nespelem, WA 99155	Dec. 20, 2010	“The cultural resources section states that a number of published ethnographies were reviewed to determine the presence of traditional cultural places. Prior to intensive agricultural development, the area between Pullman and Spokane was rich in root crops, but specific locations are not recorded. Given the lack of understanding about the traditional use of the project area and the scope of the project, we recommend that a Native American Traditional Cultural Property study be conducted as a part of the cultural resources study.”	Comment noted. The author recognizes and respects that the majority of the information regarding TCPs, if required, is usually unpublished and unavailable to the public, and should be obtained through tribal representatives.  The application of NHPA is inappropriate on state-level projects reviewed under SEPA. Rather, archaeological investigations conducted on state-level projects should be conducted in compliance with RCW 27.53. Nonetheless, the <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011)(page 10, paragraph 5) recognizes the cultural importance of plants:  “Plant resources also played an important role in diet and the annual round. Camas and other roots were gathered in the region between Pullman, Washington and Moscow, Idaho (Trafzer and Scheurman, 1986).”  DEIS Section 3.8.2.1 has been revised to incorporate this information.	Please refer to the revisions based on the response to Comment 111 (CCT-2).
<b>113 CCT-4</b>	Additional Information	Cultural Resources	Camille Pleasants Confederated Tribe of the Colville Reservation Nespelem, WA 99155	Dec. 20, 2010	“We reserve the right to revise our comments as information becomes available.”	Comment noted. A copy of the complete <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011) was provided to the Confederated Tribes of the Colville Reservation prior to issuance of the FEIS.	No change to the text required.
<b>114 DWEB-1</b>	Supports Project	General	Dal Webley LaCrosse, WA	Dec. 20, 2010	“I support the approval of the Draft Environmental Impact Statement (DEIS) for the Palouse Wind project near Oakesdale, WA. The DEIS provides a complete assessment of the environmental and social impacts that the project will have on the site where the wind farm will be constructed.”	Comment noted.	No change to the text required.
<b>115 DWEB-2</b>	Job Creation	Socioeconomics	Dal Webley LaCrosse, WA	Dec. 20, 2010	“Let’s bring some of that economic prosperity to Whitman County. Approximately 160 construction jobs and 18 permanent jobs would be huge for Whitman County and the surrounding towns of Oakesdale, Rosalia, and St. John.  Please approve the DEIS and help kick start some positive economic momentum for Whitman County.”	Comment noted.	No change to the text required.

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<b>116</b> <b>FAAM-1</b>	Aviation Impacts	Health and Safety	Augustin Moses, P.E. Federal Aviation Administration Operations Support Group Western Service Area (425) 203-4536		"The FAA needs to assess if there are any problems with the beacon targets in enroute airspace that cannot be mitigated. If such situation occurs then it would allow degradation of a key radar system which is a major safety concern."	Comment noted. Per WCC 19.61.060(13)(b), turbines will have lighting and markings that meet FAA requirements. Palouse Wind will continue to consult with FAA according to established procedures. See Table ES-3, DEIS pages ES-24 and ES-26.	No change to the text required.
<b>117</b> <b>FAAM-2</b>	Aviation Impacts	Health and Safety	Augustin Moses, P.E. Federal Aviation Administration Operations Support Group Western Service Area (425) 203-4536		"In addition, the FAA is coordinating with the military for its comments on the impacts to the military routes due to the proposed project, and communicate with you of any of the implications the military may come up with."	Comment noted. Palouse Wind will continue to consult with FAA according to established procedures and comply with FAA requirements. See Table ES-3, DEIS pages ES-24 and ES-26.	No change to the text required.
<b>118</b> <b>FOL-1</b>	Palouse Prairie	Vegetation	Ray and Joan Folwell Pullman, WA 99163	Dec. 20, 2010	"After seven years of continual effort (planting, replanting, weed maintenance, seed collection and growing, etc.) and investments (3 CRP programs, a WA Department of Ecology grant (\$2,700.00), a US Fish and Wildlife grant (\$21,000.00), personal expenses for supplies, tools, and machinery including a tractor and accessories), we are beginning to make our acreage look like Palouse Prairie. However, most of what constitutes the biomass of the Prairie is below the surface of the ground -75 to 85% of it. The biota that make up that underground symbiotic plant and animal community are what makes the Prairie so dynamic and powerful as a carbon sequestering system; it is that carbon sequestering ability that makes the soil so extremely fertile. It is the Prairie system that has built up the soil in this region to become some of the most productive in the world. We Folwells cannot hope to duplicate or restore that system in our lives. It can only be done by nature and time."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>119</b> <b>FOL-2</b>	Palouse Prairie	Vegetation	Ray and Joan Folwell Pullman, WA 99163	Dec. 20, 2010	"We believe from experience that the mitigation measures noted in Part 3.2.6 for 'restoration' of native Palouse Prairie areas that will be disturbed in any way by the construction of this wind farm are completely inadequate."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>120</b> <b>FOL-3</b>	Palouse Prairie	Vegetation	Ray and Joan Folwell Pullman, WA 99163	Dec. 20, 2010	"We urge you to prohibit any disturbance of these native Palouse Prairie areas as a stated condition in the final version of the EIS for the Palouse Wind Farm."	Please refer to the responses to Comment 48 (KIE-11), Comment 57 (KIE-20), and Comment 87 (WNPS-2).	Please refer to the responses to Comment 48 (KIE-11), Comment 57 (KIE-20), and Comment 87 (WNPS-2).
<b>121</b> <b>GIB-1</b>	KOP-1 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 1 Rosalia: Baseball field site does not mention the view in regard to nearby residences."	The closest residences to the baseball field are directly north of it, along the west side of South Summit Avenue. Views of the turbines from these residences would be more obstructed than the views from KOP 1 due to vegetation near the residences and the row of trees on the east side of South Summit Avenue that would block views toward the Proposed Action site for at least part of the year. Additional residences with views to the south are located north of Saint John's Road. However, terrain and vegetation interrupts some of these views of the Proposed Action site. KOP 1 offers a clearer view of the turbines than from either of these residential areas	No change to the text required.
<b>122</b> <b>GIB-2</b>	KOP 2 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 2 Oakesdale: By selecting a cemetery site this should minimize any negative impact statement by residents, although	Comment noted. The DEIS will be revised as indicated.	DEIS Section 3.9.2.2/KOP 2: Oakesdale (page 3-110) will be revised as follows:

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					they acknowledged the impact to visitors and motorists again, little to no regard for nearby non participating homeowners."		<p><del>KOP 2 is located just outside of central Oakesdale near the Oakesdale Cemetery and the intersection of SR 271/SR 27 with and Tekoa-Oakesdale Road. As with Rosalia, Oakesdale is one of the closest communities to the Proposed Action, so it warranted a KOP. The closest turbines to this KOP location chosen would be approximately 2.5 miles away. However, it was difficult to find publicly accessible locations in downtown Oakesdale that had better unobstructed views of the Proposed Action and the Steam Shovel Hill areas site than this location because views from most locations in town would be obscured by trees and buildings. This location would be one of the places in Oakesdale where the Facility would be potentially most visible. The location of this KOP provides unobstructed views of the Proposed Action and Steam Shovel Hill areas from a roadway that is accessible to the general public. Its views of the Proposed Action and Steam Shovel Hill sites are similar to those from the nearby Oakesdale Cemetery (the southern boundary of which is approximately 400 feet north of the KOP 2 location) and nearby residences that are at a similar elevation. The closest turbines to KOP 2 would be approximately 2.5 miles away. For this FEIS, a second photograph was taken to the immediate "right" of the KOP 2 photographs that were included in the DEIS and DEIS Addendum and a "panorama" image was created using parts of the two photographs. The new panoramic image was used to develop a simulation of the Proposed Action turbines.</del></p> <p>The view to the west from this location includes SR 271/SR 27, several residences and farm buildings, the Oakesdale water tower and fields (see Figure 8a of Appendix H included herein). Trees planted as windbreaks and for landscaping as well as the town's water tower are silhouetted against the sky and provide vertical elements in this rolling landscape largely devoid of trees. Granite Butte and Naff Ridge Higher ridges can be seen several miles behind the rolling hills in the foreground. People who would potentially view the Facility from this location include motorists (locals and travelers), and people visiting the nearby cemetery and people at nearby residences that are located at elevations similar to KOP 2 would have views that are similar to the view depicted in Figure 8a (provided herein). The viewing sensitivity of changes to the viewed landscape for motorists (including possible sightseers) who quickly drive by it is considered to be low to medium. The viewing sensitivity of visitors to the cemetery is who may spend moderate amounts of time there is considered to be medium to high and the sensitivity of residents is considered to be high.</p>
123 GIB-3	KOP-3 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 3 Steptoe: Although this site is a good selection in respect to overall regional view shed, it again has more concern given to visitors than to taxpayers."	Comment noted.	No change to the text required.

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<b>124</b> <b>GIB-4</b>	KOP-4 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 4 195 North: This site does not address residential impact at all, when in fact this view mimics the visual impact from my living room. It makes one wonder if in fact the individuals completing this study were indeed told to ignore any negative impacts or maybe just inept at realizing/stating the obvious."	The site for KOP 4 was selected to offer one of clearest and least obstructed views of the Proposed Action site from US 195 (which is the viewing area from which the greatest number of people will see the Facility). Views from residences located at similar distances (1.5 to 2.5 miles) from turbines were represented in KOP 5 (Trestle Creek Road).	No change to the text required.
<b>125</b> <b>GIB-5</b>	KOP-5 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 5 Trestle Creek; The choosing of this site was representative of what could be considered as typical to non participating homeowners. Why when there is a high impact to residents were the full effects or presence and appearance of wind turbines omitted."	The simulation for KOP 5 was able to establish that there would be moderate to high visual impacts to views from residences in this area depending upon viewing location. From the KOP 5 location, additional turbines would be seen to the left side of the simulated photograph. The additional turbines that would be seen would be no more prominent than those depicted in Figure 11b of the DEIS Addendum. We do not typically use panoramic views for simulations if a "one-frame" view can establish impacts, as was the case for KOP 5. One-frame views are preferable to panoramic views because one-frame views are better able to replicate the viewing angle of how the human eye sees a landscape.	No change to the text required.
<b>126</b> <b>GIB-6</b>	KOP-6 Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"KOP 6; 195 South; This area also selected to negate any possible impact that would not reflect favorable results."	This location offered one of the closest and most unobstructed views of the Steam Shovel Hill area available to the public, which is why it was chosen.	No change to the text required.
<b>127</b> <b>GIB-7</b>	General KOP Selection	Visual and Aesthetics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"When addressed we were told that representative sites would be chosen and approved by the Planning Department as best reflect areas of concern as related to visibility impact. It is my opinion that the site selection was closely monitored as to put this project in the best possible position not to show negative impact to residents. While looking at included maps that show locations of the selected KOP's it is easy to infer that the County Planning office did indeed plan to reduce or omit as much negative impact findings as possible."	An explanation of how the KOPs were selected is provided on DEIS pages 3-105 and 3-106. Whitman County selected all KOP locations. Please note, the selected KOPs are from locations that are accessible to the public and are not on private property.	No change to the text required.
<b>128</b> <b>GIB-8</b>	Noise Research	Noise	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"Next in relationship to the noise produced by an operating wind farm, it appears again that Whitman County chooses to ignore the most recent studies and findings by authoring and accepting noise compliance standards that have been shown to be ineffective."	The varying views are discussed on DEIS pages 3-192 and 3-197. The Facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.	No change to the text required.
<b>129</b> <b>GIB-9</b>	Noise Monitoring	Noise	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"For the protection of residents it would be prudent to have noise sampling conducted prior to construction and completion and continuous monitoring to take place to protect non participation homeowners."	Comment noted. The Facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.  As described in DEIS Section 3.15.2, ambient noise levels are highly variable. Ambient noise is the result of a number of factors, including wind conditions, and the presence of other noise sources such as agricultural equipment operations; irrigation pumps and equipment; livestock; road, rail, and air traffic; wildlife, birds, insects, and dogs; and routine human activities. In addition, the applicable standard in Washington (WAC Chapter 173-60) is not dependent on existing ambient levels. Washington State noise regulations, which Whitman County has adopted, require compliance with maximum noise limits, not ambient noise levels. These state standards must be met regardless of ambient noise levels.  DEIS Section 3.15.4.2, (page 3-192 and forward) discusses potential health concerns raised during scoping, concluding that the exposure to noise of both participating and non-participating landowners will not lead to adverse health	No change to the text required.

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						effects. As required by WCC 19.61.060(4) "Noise: State noise standard compliance," Facility turbines will be sited during construction and operations to meet or exceed the applicable noise standards." Code enforcement is the appropriate County mechanism for addressing future assertions of the Proposed Action's noncompliance with state and county noise standards.	
<b>130</b> <b>GIB-10</b>	Noise Monitoring	Noise	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"It is a shame that home owners have to pay to have studies done in order to protect themselves in the future."	Comment noted. DEIS page 3-198 specifies that additional noise modeling of the Facility will be conducted. The Facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.  Code enforcement is the appropriate County mechanism for addressing future assertions of the Proposed Action's noncompliance with state and county noise standards.	No change to the text required.
<b>131</b> <b>GIB-11</b>	Noise Monitoring	Noise	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"The county wants residents to believe there will be no harm to their quality of life, but the county's decision not to require testing or future mitigation when proven wrong only shows intent to ignore possible violations."	Comment noted. In addition, Please refer to the response to Comment 6 (WHI-1). DEIS page 3-197 acknowledges that some may find the Facility disturbing. DEIS page 3-198 specifies that additional noise modeling of the final Facility will be conducted. The Facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.	No change to the text required.
<b>132</b> <b>GIB-12</b>	Property Values	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"In regards to the issue of property values the drafters of this section were obviously told to omit as much negative information as feasibly possible. It is apparent that those charged with protecting the people's interest only have the interest of the county as a whole and not individuals."	DEIS Section 3.16.4.2, page 3-206 references the most up-to-date research on the impact that wind-power projects may have on property values.  The economic analysis presented in Appendix I, <i>Economic Impacts of the Proposed Palouse Wind Project</i> (Yoder, 2010) accurately represents the findings of cited research.  The preparers of this analysis included the appropriate qualifiers when discussing research findings so as not to imply "evidence of absence." An example of the preparer's representation of data is included in the following excerpt from Appendix I, <i>Economic Impacts of the Proposed Palouse Wind Project</i> :  "The Entrix analysis concludes that there is <i>no systematic evidence</i> in the literature that suggests a negative impact of wind power developments on surrounding land values. Since the 2009 publication of Entrix, a larger scale, multi-state study has been published that, again, finds <i>no discernible statistically significant negative impact</i> on residential property values attributable to wind power projects" (emphasis added).	DEIS Section 3.16.4.2, Impacts to Property Values (page 3-206) will be revised as follows:  <b>Impacts to Property Values.</b> <i>Yoder (2010) provides a summary of studies that have evaluated the impact of wind power projects on surrounding property values. One of these studies, the Entrix (2009) study, concluded that there was no systematic evidence in the literature that suggests a negative impact of wind power development on land values. Another study, Hoen (2009), also reviewed by Yoder (2010), showed no statistically significant impact on residential property values attributable to wind power projects other than leased property, which will receive additional income from Palouse Wind leases. Despite the prediction of some researchers that property values will be negatively impacted, Hoen notes that based on numerous studies (Poletti, 2005 and 2007; Hoen, 2006; Sims and Dent, 2007; Sims et al., 2008) large impacts (for example, greater than 10 percent of the overall property value) have failed to materialize when actual sales are investigated after construction of wind energy facilities. These findings are also supported by a more recent study conducted by Hinman (2010). Hinman's study presents evidence that demonstrates even close proximity to one operating wind farm that was analyzed did not necessarily negatively influence property value appreciation rates or property value levels. Thus, the construction and operation of the Facility will likely not have a negative effect on property values overall.</i>  DEIS Section 4.17 will include the following references:  <i>Hoen, B., R. Wiser, P. Cappers, M. Thayer, G. Sethi. 2009. The Impact of Wind Power Projects on Residential Property Values in the United States: A Multi-Site</i>

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							<u>Hedonic Analysis. U.S. Department of Energy.</u> <u>Hinman, J. 2010. Wind Farm Proximity and Property Values: A Pooled Hedonic Regression Analysis of Property Values in Central Illinois. University of Illinois.</u>
<b>133</b> <b>GIB-13</b>	Economic Research	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"The cited studies and models used and reviewed are both dated and skewed."	Comment noted. The studies cited in Appendix I, <i>Economic Impacts of the Proposed Palouse Wind Project</i> (Yoder, 2010), are widely accepted by both professional and academic communities. Relevant peer-reviewed research was also included in this analysis when available. Furthermore, no study or model used in this analysis can be considered dated by academic standards. The vast majority of research referenced in this analysis was published over the last 24 months, with multiple studies being as current as 2010.	No change to the text required.
<b>134</b> <b>GIB-14</b>	Economic Research	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"If the preparer's would have read the studies that they cited, they do not state that there are no negative impacts. Most of these studies include absence of evidence vs. evidence of absence disclaimers."	Comment noted. Please refer to the response to Comment 132 (GIB-12).	No change to the text required.
<b>135</b> <b>GIB-15</b>	Economic Research	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"There are newer studies (look at the dates of studies reviewed for God's sake) that show actual sales and findings exactly the opposite of the conclusions drawn by asking tax assessors and a single real estate sales agent."	Comment noted. Please refer to the response to Comment 137 (GIB-17).	No change to the text required.
<b>136</b> <b>GIB-16</b>	Economic Impacts	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"By the sure nature of placement of wind farms in remote locations, most have little to no sales activity in the area as related to list as a non participating party."	Comment noted. Please refer to the response to Comment 132 (GIB-12).	Please refer to the revisions based on the responses to Comment 132 (GIB-12).
<b>137</b> <b>GIB-17</b>	Property Values	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"The studies that do reflect minimal impact to as much as 70 percent decline in property values."	Comment noted. Please refer to the response to Comment 132 (GIB-12). Portions of this comment are factually inaccurate.  Research conducted by Ben Hoen of the Lawrence Berkeley National Laboratory in 2009 (cited by Mr. Gibbar in Comment 138, below) notes that while many experts (for example, appraisers, assessors, realtors) have not experienced notable reductions in value, some researchers have predicted negative impacts to property values. This impact to property value has been predicted by one researcher (Kielisch) to be as much as 24 to 43 percent.  Despite the prediction of some researchers that property values will be negatively impacted, Hoen notes that based on numerous studies ( <i>Poletti, 2005 and 2007; Hoen, 2006; Sims and Dent, 2007; Sims et al., 2008</i> ) large impacts (for example, greater than 10 percent) have failed to materialize when actual sales are investigated after construction of wind energy facilities.	Please refer to the revisions based on the responses to Comment 132 (GIB-12).
<b>138</b> <b>GIB-18</b>	Property Values	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	"Even US DOE has concluded that in relationship to wind farms protections should be put into place to protect property values of non participating effected parties.  *HOEN May 2010 Impacts on Residential Property Values Near Wind Turbines: An Overview of Research Findings and Where to Go From Here, Lawrence Berkeley National laboratory NEWEEP Webinar May 5, 2010, Funded in part by the U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, Wind & Hydropower Technologies Program."	Comment noted. Portions of this comment are factually inaccurate.  The presentation cited in this comment, while funded in part by the U.S. Department of Energy (DOE), does not reflect an agency conclusion or directive regarding wind energy facilities. Furthermore, a transcript of this Webinar obtained from the New England Wind Energy Education Project (NEWEEP) does not contain any reference to DOE making this claim.  Hoen's research does, however, lead him to the following conclusions regarding the impact of wind energy facilities on	Please refer to the revisions based on the responses to Comment 132 (GIB-12).  DEIS Section 4.17 will include the following reference:  <u>Hoen, Ben. 2010. Impact of Wind Power Projects on Residential Property Values Webinar. New England Wind Energy Education Project Webinar. Transcript available from <a href="http://www.windpoweringamerica.gov/filter_detail.asp?itmid=2610">http://www.windpoweringamerica.gov/filter_detail.asp?itmid=2610</a>. Accessed January 7, 2011.</u>

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						<p>neighboring property values.”</p> <p><i>“There is an absence of evidence of sale prices of homes - evidence that sale prices of homes without views of turbines and further than one mile from the facility are stigmatized with arrival of that facility.</i></p> <p><i>Similarly there is an absence of evidence that sale prices of homes with a view of turbines are uniquely stigmatized, even if that view is dramatic”</i> (Hoen, 2010).</p>	
<b>139 GIB-19</b>	DEIS Process	General	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	“It is truly hard to believe that so many omissions of fact is pure coincidence or is it collusion between affected parties.”	<p>The DEIS was prepared in compliance with the requirements of Revised Code of Washington (RCW) 43.21C.120 (SEPA), and WAC 173-802 (SEPA Procedures) and WAC 197-11 (SEPA Rules).</p> <p>Please refer to the response to Comment 42 (KIE-5).</p>	No change to the text required.
<b>140 GIB-20</b>	Tax Impacts	Socioeconomics	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	“As to asking tax assessors if they have realized negative impacts, who you trying to fool? I have yet to meet an assessor that would devalue a neighboring property based on construction of a large capital project on an adjoining parcel. Revenue is the name of the game; fairness goes out the window, this coming from someone who has seen his taxes more than double on his own property in just a couple of years.”	Comment noted.	No change to the text required.
<b>141 GIB-21</b>	DEIS Process	General	Dave Gibbar Thornton, WA 99176	Dec. 20, 2010	“In conclusion if the county so chooses to purposely omit findings of fact over theory, you could have just told the truth and ended with a statement that community tax revenues trump private property rights sorry but tough shit.”	Comment noted.	No change to the text required.
<b>142 GWI-1</b>	Revenue Impacts	Land Use and Agriculture	Bruce D. Gwinn Bloomfield Hill, MI 48304	Dec. 20, 2010	“The Gwinn family has been involved in farming wheat in Whitman County for generations. The stability of wind revenue makes a welcome balance to the volatility of farming.”	Comment noted.	No change to the text required.
<b>143 GWI-2</b>	Economic Impacts	Socioeconomics	Bruce D. Gwinn Bloomfield Hill, MI 48304	Dec. 20, 2010	“In a broader sense, this will be a definite boon to Whitman County, and to the wider region. In a time when we are trying to adjust to sustainable energy sources, 100 MW of renewable electricity is a very solid start. In addition, the construction and operations jobs will help to diversify the Whitman county economy.”	Comment noted.	No change to the text required.
<b>144 GWI-3</b>	County Wind Ordinance	Visual and Aesthetics	Bruce D. Gwinn Bloomfield Hill, MI 48304	Dec. 20, 2010	“I understand that wind turbines have a visual impact. I think that the County’s Wind Ordinance properly considers the rights of all parties, and the Draft EIS is comprehensive and is in full compliance with the measures outlined in detail in the ordinance.”	Comment noted.	No change to the text required.
<b>145 GWI-4</b>	Supports Project	General	Bruce D. Gwinn Bloomfield Hill, MI 48304	Dec. 20, 2010	“I urge you to approve the Palouse Wind Draft EIS. It’s an important project that I am fully supportive of.”	Comment noted.	No change to the text required.
<b>146 HAL-1</b>	Palouse Prairie	Vegetation	David Hall Moscow, ID 83843	Dec. 20, 2010	“All of the native perennial (Palouse Prairie) remnants are valuable because the ecosystem is rare, whether or not they contain rare plants.”	Comment noted. Palouse Wind will avoid impacts to Palouse Prairie remnants to the maximum extent practicable. Please refer to the response to Comment 87 (WNPS-2).	No change to the text required.
<b>147 HAL-2</b>	Palouse Prairie	Vegetation	David Hall Moscow, ID 83843	Dec. 20, 2010	“The DEIS states that Granite Knob is a high quality Palouse prairie remnant. [DEIS p. 12, 3.4.2 Field Results] This remnant especially should be avoided during construction, operation, and decommissioning. The DEIS states that ‘One area surveyed on the east on Granite Knob is a high quality area of Palouse prairie habitat that should be avoided, if possible.’ But it then seems not to follow its own advice, as there appear to be	<p>The final layout of the Proposed Action will include micro-siting elements to avoid impacts to special status plant populations, including Palouse Prairie remnants, to the maximum extent possible.</p> <p>As indicated in DEIS Section 3.2.6, most remnant Palouse Prairie habitats are expected to be avoided. If avoidance is not fully possible, disturbance to these areas will be minimized,</p>	<p>No change to the text required.</p> <p>Please refer to the revisions based on the responses to Comment 48 (KIE-11), Comment 57 (KIE-20), and Comment 87 (WNPS-2).</p>

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					towers located within that remnant.”	and the mitigation measures outlined in DEIS Section 3.2.6 will be implemented. During final Facility design, the actual layout of elements will be field-verified with the location of the prairie remnants and adjustments to Facility location will be made to ensure the maximum avoidance to the extent possible.  Please refer to the response to Comment 87 (WNPS-2).	
<b>148 HAL-3</b>	Vegetation Restoration	Vegetation	David Hall Moscow, ID 83843	Dec. 20, 2010	“Simply replanting salvaged plants or reseeding native species will not restore a damaged prairie habitat. The prairie is more than the individual plants.”	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>149 HAL-4</b>	Palouse Prairie	Vegetation	David Hall Moscow, ID 83843	Dec. 20, 2010	“We should not allow any of it to be damaged in the development or operation of the proposed wind farm.”	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>150 HAL-5</b>	Sensitive Species	Wildlife	David Hall Moscow, ID 83843	Dec. 20, 2010	“Better studies should be performed for the giant Palouse earthworm, raptor nests and raptor nest density, nocturnal avian migrants and raptors, bats, and American kestrels.”	Please refer to the responses to Comment 46 (KIE-9), Comment 50 (KIE-13), Comment 51 (KIE-14), Comment 56 (KIE-19), and Comment 57 (KIE-20).	No change to the text required.
<b>151 HAL-6</b>	Health Impacts	Health and Safety	David Hall Moscow, ID 83843	Dec. 20, 2010	“There is some debate as to the health effects of the power in power lines. High frequency voltage transients (‘dirty electricity’) are a potential carcinogen. ‘Dirty electricity rides along on the sixty-cycle sine wave of alternating current (AC) power as high frequency voltage transients, between two and one hundred kilohertz.’ [Milham, S. 2010. Dirty Electricity: Electrification and the Diseases of Civilization. Bloomington, IN: Rising Star/iUniverse., p. xi]”	The debate on the health effects of power in power lines has been ongoing for many years. Dr. Milham has been active in this area of EMF health effects for some time, but has not obtained support from the scientific community that the so-called “dirty electricity” is a health concern.	No change to the text required.
<b>152 HAL-7</b>	Health Impacts	Health and Safety	David Hall Moscow, ID 83843	Dec. 20, 2010	“The health effects of the generation and transmission of clean electricity is noted in the DEIS, which states that ‘there is no causal relationship between exposure to extremely low frequency EMF associated with 60 Hz electrical facilities and adverse effects to human health.’ [DEIS p. 3-131]  ‘Smooth’ 60-Hz sine wave EMFs seem to have few biological effects in animal exposure studies. [Milham 2010, p. 91]  New findings on transients—particularly those crawling along utility wiring—are causing some scientists to rethink that part of the debate pertaining to the hazards of power lines. Contracted researchers from McGill University studying the health effects of power line EMFs on Hydro-Quebec employees found that workers exposed to high-frequency transients had up to a 15-fold increased risk of developing lung cancer. [Segell, M. January 2010. Electroshocker: A Prevention Special Report. Prevention. health.msn.com/health-topics/articlepage.aspx?cp-documentid=100251510]”	Many thousands of studies have been conducted around the world looking for any link between EMF exposure and a disease outcome. The National Academy of Science and the National Institute of Environmental Health Sciences did not find a causal link between exposure to EMF and disease.  Transients on power lines have been produced for many years from many types of devices such as room dimmer switches and small electrical appliances. While there has been some concern that these transients may interfere with sensitive electrical devices and possibly AM radio and TV reception, significant health issues from the Proposed Action are not likely.	No change to the text required.
<b>153 HAL-8</b>	Health Impacts	Health and Safety	David Hall Moscow, ID 83843	Dec. 20, 2010	“The recent utility practice of tying the neutral return lines to the ground will also increase dirty electricity in ground currents. [Milham 2010, p. 59]”	Utilities have tied neutral return lines to ground rods in electrical distribution systems for over a century. This is and has been the usual practice in local power distribution systems. High-voltage power transmission lines do not have a neutral conductor at all. This practice is nothing new and is quite common.	No change to the text required.

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<b>154</b> <b>HAL-9</b>	Health Impacts	Health and Safety	David Hall Moscow, ID 83843	Dec. 20, 2010	<p>“‘Green’ energy resources (such as wind and photovoltaic solar generating facilities) may increase exposures to dirty electricity. They use grid intertie inverters and controllers to convert the power they generate into utility-grade electricity that can be sent out on the grid, and the devices that do the conversion inject transients onto the grid. [Milham 2010]</p> <p>‘I’ve looked at the wind farms and I’ve looked at photovoltaic solar. They can both be...producers of dirty electricity...If they have bad [grid intertie converters] they dirty-up the grid right from the get-go. I’ve measured a wind farm here in the valley here by Palm Springs, it’s the worst ground current tracings I’ve ever seen anywhere. [Milham, S., MD, MPH. Epidemiology and Electromog. KPFA broadcast, October 26, 2010. yourownhealthandfitness.org. Transcription of radio program, from minutes 53:19–55:37]”</p>	<p>Wind turbines and photovoltaic systems do have grid-tied inverters and controllers to condition the power they produce for the power grid.</p> <p>Other than Dr. Milham, no scientists have expressed a concern about these devices producing transients that create a health hazard. Furthermore, Dr. Milham’s research methods have not been widely accepted in the scientific community.</p>	No change to the text required.
<b>155</b> <b>HAL-10</b>	Health Impacts	Health and Safety	David Hall Moscow, ID 83843	Dec. 20, 2010	<p>“The Palouse Wind electric grid should be built with wiring adequate to return currents to the substation without using the ground. It should also use equipment that produces transient-free power to the Avista lines.”</p>	<p>Comment noted. Please refer to the response to Comment 151 (HAL-6).</p> <p>Palouse Wind will use standard utility practices to electrically connect the wind turbines to each other and to the grid. This will include a neutral in the collector lines that brings the power to the substation and no neutral in the transmission tie line that exits the substation. No extraordinary equipment is needed to filter any transients from the 60-Hz power produced by Palouse Wind.</p>	No change to the text required.
<b>156</b> <b>HAT-1</b>	Palouse Prairie	Wildlife/ Vegetation	Timothy D. Hatten Moscow ID 83843	Dec. 20, 2010	<p>“My overarching concern is for the protection of Palouse Prairie in the proposed project site. As you know, several patches of prairie (i.e. ‘remnant’ Palouse Prairie) have been identified on the site, and at least several state listed rare plant species are likely to be present in the project area. It is also certain that numerous animals including mammals, birds, bats and invertebrate species occur, or utilize, these Palouse Prairie remnants as well, and these deserve to be conserved as each contributes to proper functioning of the ecosystem.”</p>	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>157</b> <b>HAT-2</b>	Baseline Surveys	Wildlife/ Vegetation	Timothy D. Hatten Moscow ID 83843	Dec. 20, 2010	<p>“A concern I have is that we do not have an adequate baseline survey of the plants or animals found in these remnants. Adequate data can only be obtained if all remnants in the area, including those found on Granite Knob, are surveyed during the correct times of year to adequately detect species presence and/or abundance. Some species are active or utilize the prairie during the spring, others during the summer, fall, or winter, hence the timing of the survey is important. To be certain that species occur in the area, however, one should survey multiple times during the year and over a minimum of a two year time period. This way seasonal phenology of the organism is accounted for as well as inter-year variation in occurrence or activity.”</p>	Comment noted. Please refer to the responses to Comment 45 (KIE-8) and Comment 47 (KIE-10).	Please refer to the revisions based on the responses to Comment 45 (KIE-8) and Comment 47 (KIE-10).
<b>158</b> <b>HAT-3</b>	GPE Sampling	Wildlife	Timothy D. Hatten Moscow ID 83843	Dec. 20, 2010	<p>“It is extremely likely that remnant prairie found on site provides habitat for rare invertebrate species including the Giant Palouse Earthworm (<i>Driloleirus americanus</i>). The Giant Palouse Earthworm is currently under a status review by US Fish and Wildlife Service to determine the merits of listing it as endangered. To detect the presence of this species, however, would require specialized sampling techniques including hand sorting, chemical extraction and/or electric shocking. These methods are time consuming and potentially expensive, but</p>	Please refer to the response to Comment 57 (KIE-20).	No change to the text required.

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					they are necessary if one is to assess presence of earthworms or <i>D. americanus</i> ."		
<b>159 HAT-4</b>	Western Bumble Bee	Wildlife	Timothy D. Hatten Moscow ID 83843	Dec. 20, 2010	"There are several bumblebee species identified by the Xerces Society as potential species for their red list, including <i>Bombus occidentalis</i> that likely occur on site. These bumblebees and especially <i>B. occidentalis</i> should be sampled for."	Invertebrates such as the bumblebee are not listed as sensitive species and do not have protected status under state or federal laws and regulations. Nevertheless, some bumblebee habitat could be impacted by the Proposed Action. However, the Proposed Action is not expected to directly impact hives, and will impact only a small percentage of the acreage the Proposed Action area encompasses.	No change to the text required.
<b>160 HOC-1</b>	Shadow Flicker	Visual and Aesthetics	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"The EIS appears to use the ordinance's discussion of 'visual and aesthetic impacts' as having a common definition with shadow flicker. Shadow flicker is more than a visual impact. It casts shadows in a pulsing manner on a residence and I do not believe the members of the Planning Commission intended for the ordinance to be interpreted that way.' The EIS should be required to perform a thorough modeling of the shadows cast by turbines based on their approved locations with consideration of the solar trajectory during all seasons. If a turbine casts shadows on a residence the County should preclude that location from development or require a shutdown of certain turbines when the flicker of a turbine would affect the residence."	The phenomenon of shadow flicker is described on DEIS pages 3-129 and 3-130. Shadow flicker has been identified as potentially causing annoyance to individuals who perceive it within their surroundings.  As stated in DEIS Section 3.10.4.2, the number of elements required to create shadow flicker, along with the frequency of cloud cover in the region, suggests that the actual occurrence of shadow flicker will be low.  Furthermore, Whitman County setback standards contained in WCC 19.61.060 are reasonably calculated to prevent shadow flicker from occurring. As discussed in DEIS Section 2.1, the Proposed Action will meet or exceed all County setback requirements. As stated in DEIS Section 3.10.6, page 3-134, Palouse Wind will comply and cooperate with the applicable complaint procedures contained in WCC 19.61.060(15).	Table ES-3, DEIS page ES-25 and DEIS Section 3.10.6 will be revised to include the following mitigation measure:  • <u>Should the County receive notice, during Proposed Action operations, of shadow flicker events occurring at adjacent residential structures, the County shall advise the Project Operator and shall arrange for the verification of the claim in accordance with applicable County code provisions. If verified, the Project Operator shall design possible measures to reduce or eliminate the shadow flicker event, subject to County approval.</u>
<b>161 HOC-2</b>	Visual Impacts	Visual and Aesthetics	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"There are certain occupied residences near the project which warrant specific scrutiny given their position relative to the wind towers. These include the Whitten, Shahan, and Hockett residences. This study should be required for both the Proposed Action and the SSEA based on the actual turbine models to be installed."	The selected KOPs needed to be from publicly accessible locations and not located on private property. The KOPs selected were also representative of what other nearby residences might be expected to see if their views are unobstructed. Because turbines have not yet been selected for the Proposed Action, the "tallest" turbines that might be used were simulated. This is a common conservative approach for wind energy projects during the SEPA review phase of a project.	No change to the text required.
<b>162 HOC-3</b>	KOP-6	Visual and aesthetics	David Hockett Oakesdale WA 9915899158	Dec. 20, 2010	"The visual impact analysis appears to be in error when stating that only 13 turbines would be visible from Oakesdale (KOP-6). It appears as if the photograph is to the southwest and only captures a view of the SSEA turbines. The direction of the area shown in Figure H-I shows the direction of the photograph as due west. The orientation of the photograph understates the visual impact of the turbines that would be located in the SO/33 turbine phase which would be visible from Oakesdale. The narrative describing KOP-6 also verbally describes Naff Ridge and Granite Butte in the background. The visible buttes in this photo are Eckhart Hill and Steam Shovel Hill."	We believe the comment is referring to KOP 2 (Oakesdale) rather than KOP 6 (US 195).The existing conditions photo, simulation, and associated analysis for KOP 2 has been revised for the FEIS. Additionally, Figure H-1 has been reproduced as Figure 3.9-1 and shows the correct direction in which the photos were taken. For the FEIS, a second photograph was taken to the immediate "right" of the KOP 2 photograph that was included in the DEIS and DEIS Addendum and a "panorama" image was created using parts of the two photographs. This resulted in more turbines being depicted in the panoramic simulation than would have been depicted in a simulation developed from a 50-mm lens (the standard lens for simulation development). The location of this KOP provides unobstructed views of the Proposed Action and Steam Shovel Hill from a roadway that is accessible to the general public.  Please refer to the response to Comment 122 (GIB-2).	Please refer to the revisions based on the response to Comment 122 (GIB-2). Additional revisions to Section 3.9 of the DEIS and DEIS Addendum are also included in the FEIS.
<b>163 HOC-4</b>	Visual Analysis	Visual and Aesthetic	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"In addition, the conclusions on the visual impact indicate the project cannot be seen from Oakesdale. A portion of Oakesdale resides in low ground, but there are four distinct hills within the Oakesdale Township which contain multiple residences. A KOP should be established on Rednour Street, at the West side of	Please refer to DEIS Section 3.9.4.2 (page 3-116), which describes what would be visible from KOP 2 (Oakesdale). It is not considered necessary to take photographs and develop simulations for all sensitive views related to a proposed project. Representative photographs and simulations of	No change to the text required.

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					the School, and at homes on the eastern and northwestern hills, which includes a significant number of residences. Oakesdale will have the most visual impact. These should be panoramic photos and should include a view of both the Proposed Action and the SSEA. See map below for specific locations."  <i>(Note – map is included in Mr. Hockett's letter to Whitman County)</i>	various situations are typically chosen to represent types of potential impacts associated with a project. Locations in other parts of Oakesdale are no closer to the simulated turbines than the location of KOP 2 (2.5 to 4.5 miles away) and many would have view obstructions like vegetation and buildings (unlike KOP 2).  Please refer to the response to Comment 122 (GIB-2).	
<b>164 HOC-5</b>	Visual Analysis	Visual and Aesthetic	David Hockett Oakesdale WA 9915899158	Dec. 20, 2010	"The visual impact analysis should also be performed from all residences within 1 mile of a turbine. It seems unusual that the people this will impact the most did not warrant a photograph near their residence. It would seem as if a photo should have been taken near the residences on Oakesdale Road and all residences on Trestle Creek Road."	See the above response related to suggestions for representative views. As shown in DEIS Addendum Table 3.9-1, the visual assessment determined that impacts to views from residences within 1.5 to 2.5 miles would range from moderate to high. Impacts to views (assuming they are unobstructed by vegetation or terrain) from residences closer than 1.5 miles can be assumed to be high. However, unless non-participating residences are located within 1,968 feet (0.37 mile) of a turbine, they would be consistent with the County's wind energy development standards established to protect residents from potential visual and aesthetic impacts (see DEIS pages 3-122 to 3-123).  Please refer to the response to Comment 161 (HOC-2).	No change to the text required.
<b>165 HOC-6</b>	Noise Impact	Noise	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"The EIS references a detailed noise study based on manufacturer's noise ratings. The EIS should not be finalized until the actual models and layouts are known and the noise study is completed. The noise study should be obtained independently of CH2M Hill and should be ordered by the County rather than Palouse Wind. I do not trust Palouse Wind or CH2M Hill to perform an accurate assessment given their bias towards development of the wind facilities."	Comment noted. DEIS page 3-198 specifies that additional noise modeling of the final Facility will be conducted. DEIS page 3-191 states, "To ensure compliance under the greatest noise-generating conditions, the turbines maximum sound power levels will be used as a basis for noise modeling." The Facility will be designed and operated in accordance with applicable state and local requirements for wind-generation facilities.	No change to the text required.
<b>166 HOC-7</b>	Noise Impact	Noise	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"In addition, a before and after A scale noise study should be performed for all nonparticipating residences within 1 mile of a turbine. How is Whitman County going to verify their modeling and ultimately the noise to which residents are subject?"	Comment noted. Please refer to the responses to Comment 165 (HOC-6), Comment 129 (GIB-9), and Comment 130 (GIB-10).	No change to the text required.
<b>167 HOC-8</b>	Turbine Specifications	General	David Hockett Oakesdale WA 99158	Dec 20, 2010	"Turbine manufacturer specifications as well as installation and operating manuals should be included in the EIS as a required exhibit. This may highlight risks with the installation and operation of turbines which may not be addressed by the EIS"	Comment noted. Please refer to the response to Comment 43 (KIE-6).	Please refer to the revisions based on the response to Comment 43 (KIE-6).
<b>168 HOC-9</b>	SSEA	General	David Hockett Oakesdale WA 99158	Dec. 20, 2010	"It does not seem appropriate to include the SSEA when Palouse Wind has not filed a permit, nor obtained approval from some of the landlord owners noted in the expansion area."	Comment noted. It is appropriate to consider the Steam Shovel Hill area in this EIS to comply with SEPA regulations. WAC 197-11-060(3)(b) requires that proposals or parts of proposals that are related closely enough to be, in effect, a single course of action to be evaluated in the same environmental document. This discourages that the analysis of environmental impacts is piecemealed if the various parts of the proposal were assessed separately.  On February 24, 2011, Palouse Wind amended its initial CUP application to incorporate the Steam Shovel Hill area into the Proposed Action area; that Amendment to Conditional Use Permit application includes owner affidavits showing their approval for use of their land for the Proposed Action.	No change to the text required.

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<b>169</b> <b>HOO-1</b>	Supports Project	General	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"After reviewing the Palouse Wind Project Draft Environmental Impact Statement (DEIS), Ecological Baseline Studies and Wildlife Impact Assessment/or Palouse Wind, as well as attending public meetings where the project's potential impacts were discussed, I very much would like to see the project completed. I believe that any negative impacts will be more than outweighed by the benefits of having a wind farm of this magnitude in the community."	Comment noted.	No change to the text required.
<b>170</b> <b>HOO-2</b>	Turbine Models	General	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"I noticed that the two proposals discussed in the DEIS are only intended to produce 100 MW of power, utilizing 50 2MW units or 33 3MW units. Why wasn't the option of utilizing 50 3MW units considered?"	Comment noted. The CUP application requests the flexibility to select the size and type of turbine based on commercially available models at the time of construction. As revised on February 24, 2010, the CUP application sets a cap of 65 turbines for the Proposed Action. Currently, commercially available turbine models range from 1.5 to 3.0 MW.	No change to the text required.
<b>171</b> <b>HOO-3</b>	Railroad	DEIS Figures	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"Many of the figures, starting with I-I indicate a railroad connecting Thornton and Oakesdale. This line has been removed and only the right-of-way remains."	Comment noted. The Thornton-Oakesdale route of the Palouse River and Coulee City Railroad (PCC), was formerly operated by Union Pacific Railroad before it was abandoned in 1992 (WSU, 2007). However, after a fire in 2006 destroyed a timber trestle near Colfax, studies were conducted by Washington State University (WSU) in 2007 and Washington Department of Transportation (WSDOT) in 2009 to examine the feasibility of reconstructing this route. While a final determination regarding the reconstruction of this line has yet to be made by WSDOT, there is a possibility that this abandoned right-of-way could once again be used for rail transport in the near future. Therefore, this route was included on the applicable figures submitted with the DEIS.	No change to the text required.
<b>172</b> <b>HOO-4</b>	Plant Names	Vegetation	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"Lewis' mock orange ( <i>Philadelphus lewisii</i> ) is better known as syringa in this area."	Comment noted. " <i>Syringa</i> " will be added as an alternate name for Lewis' mock orange.	DEIS Section 3.2.2.1/Riparian, sentence 2 (page 3-13) will be revised as follows:  <i>The most common vegetation elements here are scattered large, mature black cottonwood (Populus trichocarpa) intermixed with riparian shrub species such as Lewis' mock orange or syringa (Philadelphus lewisii) and chokecherry (Prunus virginiana).</i>
<b>173</b> <b>HOO-5</b>	Plant Names	Vegetation	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"The common name for <i>Pseudotsuga menziesii</i> is Douglas-fir (with a hyphen)."	Correction made; hyphen will be added.	In DEIS Sections 3.2.2.1/Upland Trees (page 3-13), Section 3.3.2.1/Upland Trees (page 3-27) and Table 3.2-1 (page 3-14), the following will be revised:  <del>Douglas-fir</del> <u>Douglas-fir</u>
<b>174</b> <b>HOO-6</b>	Energy Resources	Energy and Natural Resources	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"The section on energy resources (3.7.2.1) seems somewhat lacking. There is no mention made of Lower Granite Dam, one of the key producers of electricity to the area. Neither Oakesdale nor Rosalia are mentioned on figure 3.1-1 [sic], and there does not appear to be any electrical utilities provided to their locations."	Comment noted. Please see revised Figure 3.7-1 and the revised text. Please note that Figure 3.7-1 shows major utilities near the Proposed Action boundary and is not intended to include smaller electrical utility facilities in communities such as Oakesdale or Rosalia. These towns have been added to Figure 3.7-1 for reference purposes only, as the Proposed Action does not require connection to transmission lines or substations in these communities. Additionally, Lower Granite Dam is not included on Figure 3.7-1 because it is located outside of the area of analysis. Lower Granite Dam is nonetheless an important regional utility, and a discussion of it is included in the FEIS as indicated.	DEIS Section 3.7.2.1/Proposed Action Area, paragraph 3 (page 3-86) will be revised to include the following paragraph 4:  <u><i>The Lower Granite Dam (LGD) is located approximately 30 miles south of the Proposed Action boundary. The LGD spans the Snake River along the border between Whitman and Garfield Counties, and has a hydroelectric nameplate capacity of 810 MW (WSU, 2008). The LGD is owned and operated by the U.S. Army Corps of Engineers, and power generated by the dam is distributed by Bonneville Power Administration (BPA, 2001). As Avista will provide interconnection services for power generated by the Proposed Action, no impacts to LGD operations or BPA's delivery of hydroelectric power from the dam are anticipated.</i></u>

**TABLE 1-1**  
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							DEIS Section 4.8 will include the following references: <u>Bonneville Power Administration (BPA). 2001. The Columbia River System Inside Story. Second Edition. Portland, Oregon. April.</u> <u>Washington State University (WSU). 2008. Lower granite Dam General Information. Available online: <a href="http://www.cbr.washington.edu/crisp/hydro/lwg.html">http://www.cbr.washington.edu/crisp/hydro/lwg.html</a>. Accessed January 7, 2011.</u>
175 HOO-7	KOP-1	Visual	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"There seems to be a problem with directions in the description of KOP-1. Rosalia is North of the wind farm, so the photograph taken for it is looking towards the South, and not the North as described."	"North" will be changed to "south".	DEIS Section 3.9.2.2, paragraph 2, sentence 3 (page 3-110), will be revised as follows:  <i>The photograph for KOP 1 was taken from the community baseball field looking <del>north</del> south toward the Proposed Action site (see Figure 7a of Appendix H the DEIS Addendum).</i>
176 HOO-8	Kamiak Butte	Recreation	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"Kamiak Butte County Park is not very well documented in section 3.12.2 as it is misidentified as a state park on figure 3.12-1 and not even mentioned in the text of section 3.12."	Comment noted. Figure 3.12-1 and the supporting text will be amended to include Kamiak Butte County Park.	See revised Figure F3.12-1. DEIS Section 3.12.2, paragraph 1 (bullet list on page 3-143) will be revised to include the following bullet: <ul style="list-style-type: none"><li><u>Kamiak Butte County Park</u></li></ul> The following paragraph will be added after DEIS Section 3.12.2, paragraph 9 (page 3-145):  <u>Kamiak Butte County Park is located 3 miles south of the city of Palouse on Highway 27. This 300-acre park offers hiking trails, wildlife viewing, and camping (Whitman County, 2009). Facilities include day-use shelters, picnic tables with cooking grills, a playground, and an amphitheatre.</u>  Section 4.13 will include the following reference: <u>Whitman County. 2009. Kamiak Butte County Park. <a href="http://whitmancounty.org/ssi.aspx?ssid=81">http://whitmancounty.org/ssi.aspx?ssid=81</a>. Accessed January 1, 2011.</u>
177 HOO-9	School District Boundaries	Public Services and Utilities	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"The Oakesdale School District is described as being 'within the close proximity of the Proposed Action site,' when the Proposed Action boundary is actually within the district boundaries."	Comment noted. The text will be amended to include Oakesdale School District.	DEIS Section 3.13.4.1, paragraph 3 (page 3-165) will be revised as follows:  <i>The Rosalia School District is north of the Proposed Action site, while the Oakesdale School District is just east of the Proposed Action site. The Proposed Action boundary crosses both the Rosalia School District and the Oakesdale School District.</i>  DEIS Section 3.14.2.4, paragraphs 1 and 2 (page 3-175) will be revised as follows:  <i>The Proposed Action boundary is located within the Rosalia Unified School District No. 320 (Rosalia, 2010) and the Oakesdale Unified School District No. 324 (Koordinates, 2010). The Rosalia School District operates one school, Rosalia Elementary and High School, which has an enrollment of 221 students. All students in the district attend Rosalia Elementary and High School from Kindergarten through 12th grade. <del>Outside of the Rosalia School District, there are two additional schools located within the close proximity of the Proposed Action site. The Oakesdale School District has an enrollment of 103 students and operates two schools: Oakesdale Elementary</del></i>

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							<i>and Oakesdale High School (Epodunk, 2007). Oakesdale Elementary School and Oakesdale High School are both located approximately 3-miles from the proposed site...</i>  DEIS Section 4.15 will include the following reference: <i>Koordinates. 2010. Washington School Districts (2007 Census). <a href="http://koordinates.com/layer/1528-washington-school-districts-2007-census/#/layer/1528-washington-school-districts-2007-census/metadata/">http://koordinates.com/layer/1528-washington-school-districts-2007-census/#/layer/1528-washington-school-districts-2007-census/metadata/</a>. Accessed January 7, 2011.</i>
<b>178 HOO-10</b>	Public Services	Public Services and Utilities	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"Section 3.14.2.5 neglects to mention that wireless, high-speed internet service is provided by First Step Research. Also, the proper name of the newspaper is the <i>Moscow-Pullman Daily News</i> ."	Comment noted. Text will be amended as requested.	DEIS Section 3.14.2.5, paragraph 3 (page 3-175) will be revised as follows:  <i>Moscow-Pullman Daily Review News</i>
<b>179 HOO-11</b>	Tax Districts	Socioeconomics	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"Which tax districts does the property leased by Palouse Wind reside in?"	The Proposed Action boundary crosses tax districts 110, 119, 130, and 131. Please see the new Figure 3.16-1, included in this FEIS.	DEIS Section 3.16.2, paragraph 4 (page 3-202) will be revised as follows:  <b><i>Fiscal Resources.</i></b> <i>The Proposed Action boundary crosses Whitman County tax districts 110, 119, 130, and 131 (see Figure 3.16-1). Data from the Washington State Auditor's Office Local Government Reporting System (LGFERS) shows increasing general property tax revenues for Whitman County despite declining total general fund revenues over the last 3 fiscal years.</i>
<b>180 HOO-12</b>	School Districts	Public Service and Utilities	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"I find it interesting that the Oakesdale School District is not mentioned as a reference for public services and utilities"	Comment noted. Text will be amended to include Oakesdale School District.	Please refer to the revisions based on the response to Comment 177 (HOO-9).
<b>181 HOO-13</b>	Wildlife Impact Assessment	Wildlife	David L Hooks Jr. Oakesdale, WA	Dec. 20, 2010	"What is meant by the term 'adjacent two miles'?"	The term "adjacent two miles" refers to a 2-mile buffer around the survey area that was used to define the wildlife database search parameters. As shown on Figure 2 in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010) the extent of the database search covers a much larger area than the Proposed Action boundary. The intent of this 2-mile buffer is to capture the most complete set of data pertaining to species that could be potentially impacted by the Proposed Action.	No change to the text required.
<b>182 KEN-1</b>	Supports Project	General	Melanie Kennedy (Hanford) 1626 E. 58th Ave. Spokane, WA 99223 Phil Hanford Wenatchee, W A 98801	Dec 20, 2010	"It is our hope to embrace clean renewable energy that maybe the source of the future. We appreciate your support of the Wind Project that will help preserve the economy of the community."	Comment noted.	No change to the text required.
<b>183 NPT-1</b>	Cultural Property	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"The literature review by Plateau Archaeological Research, Inc. presents a thorough discussion of Euroamerican exploration and settlement within the project area. Unfortunately, it does not sufficiently address archaeological or cultural properties of the Nez Perce Tribe."	Comment noted. Please refer to the responses to Comment 185 (NPT-3) and Comment 190 (NPT-8). The comments to the literature review and survey report submitted by DAHP and the tribes have been considered and revisions to the DEIS text made accordingly.	Please refer to the revisions based on the responses to Comment 185 (NPT-3) and Comment 190 (NPT-8).

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<b>184 NPT-2</b>	Traditional Cultural Properties	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"Despite the review of a handful of ethnographic materials. It should be noted that this is in no way comprehensive enough to identify Traditional Cultural Properties. The determination of the likelihood of TCP's being present must be based upon the 'totality of evidence,' which includes information that may not be documented. Despite many of these ethnographies which were consulted being very good resources, they are by no means conclusive and should not be viewed as being a sufficient effort to address TCP's or the identification of these properties."	Please refer to the responses to Comment 185 (NPT-3) and Comment 190 (NPT-8).	Please refer to the revisions based on the responses to Comment 185 (NPT-3) and Comment 190 (NPT-8).
<b>185 NPT-3</b>	Traditional Cultural Properties	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"Additionally, the statement that 'no camps or villages were located in or near the Project Area,' is not the case, since the Colfax, Washington area is a known historically occupation site of the Nez Perce Tribe. The ancestral name for this place in the Nez Perce language is ti'natpa'ama."	Comment noted. The ancestral name for this location has been included in the EIS text.	DEIS Section 3.8.2.1 (page 3-98) will be revised as follows:  <b><i>The Nez Perce.</i></b> <i>The Nez Perce are divided into Upper Nez Perce and Lower Nez Perce. While the Nez Perce as a whole exhibit lifestyles typical of Indians living within the Columbia Basin, the Upper Nez Perce led a lifestyle more typical of Plains Indians. The Lower Nez Perce were closely related linguistically, culturally, and socially to neighboring tribes such as the Palouse, Walla Walla, Yakama, Umatilla, and Wayampam. The Colfax, Washington area was historically occupied by the Nez Perce Tribe. The ancestral name for this place in the Nez Perce language is ti'natpa'ama. Steptoe Butte is also an important landmark for the Nez Perce people, which is referred to as yomâstas in the Nez Perce language. The Nez Perce had a network of trails throughout their territory that followed major waterways, ridgelines, and other natural geographic features.</i>
<b>186 NPT-4</b>	Traditional Cultural Properties	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"The Steptoe Butte is also a very important sacred site/landmark for the Nez Perce people, which is referred to as yomâstas in the Nez Perce language."	Please refer to the responses to Comment 185 (NPT-3). DEIS Section 3.8.2.1 has been updated to reflect Steptoe Butte as an important landmark for the Nez Perce people; the ancestral name for this location has also been included in the EIS text.	Please refer to the revisions based on the response to Comment 185 (NPT-3).
<b>187 NPT-5</b>	Traditional Cultural Properties	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"Also, the assertion that 'Nez Perce trails following major waterways' is somehow indicative of all types of trails systems used by the Nez Perce is also an untrue statement. Many well known trail systems followed ridgelines and other natural geographic features."	Please refer to the responses to Comment 185 (NPT-3). The discussion of trail systems used by the Nez Perce people will be updated in the cultural resources survey report to reflect the various types of geographic features used as trail systems.	Please refer to the revisions based on the response to Comment 185 (NPT-3).
<b>188 NPT-6</b>	Shovel Probes	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"The authors state that, 'Plateau has pinpointed locations for shovel probing' (p 27). The Tribe expects an opportunity to review the methodology used to identify these locations before commenting on this specific activity."	The <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011) was provided to the Nez Perce Tribe for review subsequent to this comment.	No change to the text required.

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<b>189 NPT-7</b>	Buried Cultural Material	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"Appendix A claims to address 'Potential for Buried Cultural Material.' In reviewing this section, we found no discussion of buried cultural material or the potential for these deposits within the project area. This section must be revised to include this discussion, or removed from the report, as it does not provide any meaningful information about the project or its possible effects on cultural resources in its present form."	The purpose of Appendix A was to identify the Paleocology of the Palouse and to relate how the changes in the environment affected the occupation of the area by humans and the resources they depended upon for survival. The appendix concluded that based on the analysis performed, habitation and resource procurement was likely tied to areas that supported wetlands. These areas would therefore represent an area where archeological native American resources might be more prevalent. The possible effects of Proposed Action have been described in the <i>Cultural Resource Survey for the Palouse Wind Project, Whitman County, Washington</i> (Plateau, 2011) – this report was provided to DAHP and the Tribes after this comment and for their review prior to this FEIS being finalized. DEIS and DEIS Addendum Sections 3.8, Cultural Resources, have been updated accordingly in the FEIS.	Please refer to the revisions based on the responses to Comment 185 (NPT-3), Comment 187 (NPT-5), and Comment 190 (NPT-8).
<b>190 NPT-8</b>	Cultural Resource Inventory	Cultural Resources	Vera Sonneck Nez Perce Tribe Lapwai, ID 83540	Dec 20, 2010	"In addition, Plateau has recommended mitigation measures to be implemented during construction and operation of the wind energy facility in the Draft EIS (p 3-100). The Tribe's cultural resources staff believes that it is premature to recommend mitigation measures before a cultural resources inventory has been completed."	Mitigation measures for potential impacts to cultural resources were identified in the DEIS Addendum. A CD of this Addendum was mailed to the Nez Perce Tribe via U.S. Postal Service on March 2, 2011.	Please refer to the revisions in Section 3.8 of the FEIS.
<b>191 NWMA-1</b>	Supports Project	General	Laura Skaer Northwest Mining Association Spokane, WA 99201	Dec. 20, 2010	"The Northwest Mining Association (NWMA) supports the Palouse Wind Project and the Draft Environmental Impact Statement (DEIS), which is currently open to public review and comment. We understand the DEIS must have been a tremendous undertaking for Whitman County. Congratulations on preparing a well crafted document."	Comment noted.	No change to the text required.
<b>192 NWMA-2</b>	Economic Impacts	Socioeconomics	Laura Skaer Northwest Mining Association Spokane, WA 99201	Dec. 20, 2010	"According to the DEIS, wind farms provide positive economic benefits to the communities in which they are built. The impact is also felt in industries that provide parts and labor for wind farms. The mining industry, for example, sees a substantial positive economic impact from the development of wind farms. A typical 3.0 MW commercial wind turbine requires 335 tons of steel, 4.7 tons of copper, 13 tons of fiberglass, 3 tons of aluminum. 2 tons of rare earth elements and 1,200 tons of reinforced concrete.  If the United States is going to expand our renewable energy production, it is critical that we domestically produce the raw materials needed to support this effort. Any claims that renewable energy development will lessen our reliance on foreign sources of petroleum ring hollow if the Nation becomes more reliant on foreign sources of the infrastructure minerals necessary to build wind turbines, transmission lines, etc. The domestic mining industry, working with the wind energy industry, can provide the jobs, metals and minerals necessary for economic recovery and energy independence."	Comment noted.	No change to the text required.
<b>193 NWMA-3</b>	DEIS Analysis	General	Laura Skaer Northwest Mining Association Spokane, WA 99201	Dec. 20, 2010	"The DEIS presents a systematic and balanced examination of potential impacts to the environment in Whitman County that result from the development of the Palouse Wind Project."	Comment noted.	No change to the text required.

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<b>194</b> <b>NWMA-4</b>	Domestic Resources	Energy and Natural Resources	Laura Skaer Northwest Mining Association Spokane, WA 99201	Dec. 20, 2010	"In times like these, it is more important than ever to approve projects that give us an opportunity to responsibly utilize our own domestic resources. The Palouse Wind project is one of these opportunities. Please facilitate the approval of the DEIS for the Palouse wind project."	Comment noted.	No change to the text required.
<b>195</b> <b>PAS-1</b>	Avian Studies	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"One of the most serious concerns we have about the ecological baseline survey is that it is incomplete and does not include the entire project area. Survey sites A through E were located in the eastern portion of the project area, with Site F located on Steam Shovel Hill, also in the eastern portion of the project area. However, the DEIS shows a large section of the project area, Figure ES-2, located on the eastern and western sides of the Old Thornton Highway, where no avian studies were conducted, neither seasonal surveys nor raptor nest surveys. Given that the baseline survey failed to include this large section of the project area, it is difficult to see how a Conditional Use Permit can be issued."	Please refer to the response to Comment 48 (KIE-11).	Please refer to the revisions based on the response to Comment 48 (KIE-11).
<b>196</b> <b>PAS-2</b>	Golden Eagles	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Washington Department of Fish and Wildlife Wind Power Guidelines recommend a minimum of one full year of avian surveys, with two or more years of data recommended when there is limited or no relevant data regarding seasonal use of the project site...  Considering the evidence of a decline in numbers for Golden Eagle populations in western North America, observed in part by our monitoring on migration routes, more specific efforts at a local scale are necessary to determine the impact of wind power generation on raptors. HWI has done raptor surveys at a local scale, but not in eastern Washington. (Markus Mika, Hawkwatch International, personal communication.) Other resources that were contacted just said: There is no raptor migration data for eastern Washington."	The first portion of this Comment is addressed in the response to Comment 46 (KIE-9).  No golden eagle nests were observed within 2 miles of the Proposed Action area (DEIS page 3-33). An additional raptor nest survey planned for 2011 will examine an area within 2 miles of turbines to be constructed. Prior to final site plan approval by Whitman County, any raptor nests identified during the surveys will be verified so that species- and lifecycle-appropriate construction buffers can be established.	Please refer to the revisions based on the response to Comment 46 (KIE-9).
<b>197</b> <b>PAS-3</b>	Baseline Studies	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Another concern we have about the baseline studies involves the non-continuous periods of the survey. During this period, there was opportunity to complete the recommended 2 years of avian surveys; however, this was not done. Considering the extreme variation in weather conditions during the seasons encompassed by this period, it would appear that the avian survey data lacks a scientific statistical consistency that would be required in an EIS. With no adequate explanation for the piecemeal scheduling of the surveys, it is not possible to know if the data represent a true characterization of the areas surveyed, or whether the results represent 'cherry-picking' of a larger data set to show more favorable conditions at the site."	Please refer to the response to Comment 48 (KIE-11).	No change to the text required.

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<b>198</b> <b>PAS-4</b>	Raptor Nest Survey	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"It is also puzzling that the raptor nest survey does not include information on the location of nests of Great Horned Owls. Great Horned Owls occupy the same habitat as Red-tailed Hawks, hunting by night in the same areas that Red-tailed Hawks hunt by day. Owls do not build their own nests but use nests built by Red-tailed Hawks when they begin nesting in the winter. When the Red-tailed Hawks begin their breeding period in spring, these nests are not available to them, so they either build another nest or use an occupied one. The raptor nest survey done in May should have located these owl nests, as the young are generally still in the nest in mid-May."	Locations of all raptor nests observed were recorded during the 2009 aerial raptor nest survey (see DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> [NWC, 2010], page 5). If nests used by great-horned owls were present within the survey area, they would have been recorded if viewable from the air. Because of the evolving Proposed Action area boundary, an additional raptor nest survey planned for 2011 will examine an area within 2 miles of turbines to be constructed. Prior to final site plan approval by Whitman County, any raptor nests identified during the surveys will be verified so that species- and lifecycle-appropriate construction buffers can be established.	No change to the text required.
<b>199</b> <b>PAS-5</b>	SSEA	General	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Another of our concerns involves the proposed Steam Shovel expansion area which will add an additional 50 MW of energy generation to the study area - an equivalent of 1/3 of the entire facility with no EIS and with, to date, incomplete data. Although only incomplete avian surveys have been conducted there (Palouse Wind Energy Ecological Baseline Studies, Northwest Wildlife Consultants, Inc, November 15, 2010), raptor use of this expansion area is greatly increased when compared to the other survey sites (Figure 8, page 59). Because there is an assumption by the owners/developers that the Steam Shovel expansion area will be issued a CUP without a separate EIS, concerns about this area must be addressed in the DEIS review."	Please refer to the response to Comment 168 (HOC-9).	No change to the text required.
<b>200</b> <b>PAS-6</b>	Steptoe Butte	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"The proximity of the site to Steptoe Butte is troubling, not only for the aesthetic degradation of the view but also for the avian use of the butte during migration. Although the avian migratory route have not been precisely identified, we feel that Steptoe and Kamiak Buttes serve as a major land mass during migration. This is evident by observations at Steptoe Butte and by bird surveys conducted at Mann Lake in North Lewiston, Idaho. Mann Lake lies due south of the two buttes and has some of the highest and most diverse migratory species counts east of the Walla Walla delta. If the Steam Shovel Hill expansion area is ever to be considered, a separate EIS must be conducted or it must be addressed in the DEIS review. The mortality of avian species is expected to be far greater than the proposed area."	Based on the results of avian point counts conducted in the Steam Shovel Hill area that show a higher number of birds present, the comment infers that the Steam Shovel Hill area, because of its closer proximity to Steptoe Butte, may experience higher avian use than the remainder of the Proposed Action area around Naff Ridge, and that some of this use would be due to migration influences. DEIS Section 3.3.4.1, Migratory Birds (page 3-34), addresses the identification of migratory birds during avian point counts and indicates that the site-specific studies did not see an increase of bird use during the spring and fall migrations.  Plot F, located in the Steam Shovel Hill area, was only surveyed during the spring and summer seasons. Most avian points that are in some type of cover, rather than wheat fields (in this case planted grassland), usually show greater use. The five species of highest mean use at Plot F were American robin, horned lark, chukar, western meadowlark, and common raven, which are all common species. Palouse Wind will conduct additional avian point count studies in the Steam Shovel Hill area. Please refer to the response to Comment 48 (KIE-11).  Please refer to the response to Comment 168 (HOC-9).  Steptoe and Kamiak buttes are located well south of the Proposed Action area and are outside the area of analysis for this EIS.	Please refer to the revisions based on the response to Comment 48 (KIE-11).

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<b>201 PAS-7</b>	Sharp-tailed Grouse Habitat	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Whitman County, with its higher rainfall and deeper soils, is being considered for the creation of more reserves for Sharp-tailed and Sage Grouse by WDFW. Both of these species are considered either threatened or endangered. Current reserves will not sustain the population and the reintroduction of the species in Whitman County holds great promise. The degradation of any native prairie will contribute to the failure of the programs being planned. Sharp-tailed grouse were native to the Palouse and extirpated by early settlers but they are a part of our heritage and should be in our future."	In a letter dated January 14, 2011, WDFW responded to our request for additional information about conservation efforts for sharp-tailed grouse and sage grouse in Whitman County. The letter indicates that there are no recovery units in Whitman County for sage grouse. In regards to the sharp-tailed grouse, WDFW indicates that Whitman County and other southeast Washington counties are in a category of "Other Potential Recovery Areas." According to the agency, potential "alternatives would be to focus on the Revere Wildlife Area and adjacent BLM lands, or get recovery started in the central or eastern part of the county, perhaps tying together some Palouse remnants with a combination of acquisitions and CRP type contracts" (Karin Divens/WDFW, 2011. Personal communication (e-mail) and B. Canty/ CH2M HILL January 14).	No change to the text required.
<b>202 PAS-8</b>	Horned Lark	Wildlife	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Our area is continually compared to other wind farm locations when describing bird habitat and projected mortality. In all cases, projected mortality is termed as non-significant. At what point is mortality considered significant? The area addressed in the DEIS is yearlong habitat for the common Horned Lark. Breeding bird surveys indicate that the northern half of the county is the primary breeding area for the Horned Lark and Grasshopper Sparrow. Horned Larks are recorded as the primary mortality of avian species by wind farms. If every wind farm removes a given percentage of the population, what is the accumulative effect on the species? When will the Horned Lark need to be protected because of the constant degradation of their population? The attitude that mortality is non-significant indicates a lack of concern that a few don't matter. They do matter!"	Please refer to the responses to Comment 56 (KIE-19) and Comment 58 (KIE-21) and to DEIS Appendix F, page 12.  The Horned Lark is not a protected species covered by the applicable regulatory guidelines contained in DEIS Section 3.3.3.  Horned larks have been the most commonly observed songbird fatality in the Columbia Plateau Ecoregion and have also been the most abundant songbird observed during pre-construction fixed point bird use surveys at these sites (Johnson and Erickson, 2010). Based on long term Breeding Bird Survey data, horned larks are likely one of the most common birds in the Columbia Plateau. An analysis of cumulative impacts to avian species from development of 6,700 MW of wind energy in the Columbia Plateau Ecoregion predicted that approximately 0.06 percent of the breeding horned lark population would be affected. Given that annual mortality rates of song birds typically range from 30 to 70 percent losses amounting to less than 1 percent are impacts to individuals, and therefore not significant from a population standpoint (Johnson and Erickson, 2010).	No change to the text required.
<b>203 PAS-9</b>	Technical Advisory Committee	General	Thomas Weber Palouse Audubon Society Pullman, WA 99163	Dec. 20, 2010	"Aside from concerns about the avian surveys our strongest concern is the lack of a TAC. A Technical Advisory Committee (TAC) is recommended to function as a post-construction advisory committee to the project owner and the permitting authority. The TAC is responsible for reviewing results of post-construction monitoring data and making suggestions to the project owner and permitting authority regarding the need to adjust mitigation and monitoring requirements based on results of monitoring data and relevant data. Potential members include stakeholders from environmental groups, wind project owners, and/or developers of the project, landowners, and county representatives, tribes, and state and federal resource agencies. (Washington Department of Fish and Wildlife Wind Power Guidelines, 2009, p. 6) The Palouse Audubon Society strongly urges that a TAC be formed. A suggested makeup of the committee would be representatives of:  <ul style="list-style-type: none"> <li>• Washington Fish and Wildlife</li> <li>• US Fish and Wildlife</li> <li>• Whitman County Commissioners</li> <li>• Whitman County Planner</li> <li>• Conservation District</li> </ul>	Please refer to the response to Comment 59 (KIE-22).	Please refer to the response to Comment 59 (KIE-22).

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					<ul style="list-style-type: none"> <li>• Wind farm landowner</li> <li>• Non-wind farm land owner</li> <li>• City of Oakesdale (or other communities being affected)</li> <li>• Palouse Prairie Foundation</li> <li>• Palouse Audubon Society</li> <li>• First Wind</li> </ul> <p>The citizens of the county deserve to have a voice in the operation of any county wind farm. The TAC affords the citizens an avenue to express concerns about operation and a forum for communication regarding the CUP."</p>		
<b>204</b> <b>PPF-1</b>	Palouse Prairie	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"No Palouse Prairie should be harmed during the construction phase. No Palouse Prairie should be harmed during operations. No Palouse Prairie should be harmed during decommissioning. Tower locations and construction disturbances should be placed so as to completely avoid Palouse Prairie."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>205</b> <b>PPF-2</b>	Palouse Prairie	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"All Palouse Prairie habitat—not just rare plant locations—should be flagged for avoidance"	<p>During the habitat characterization and rare plant surveys, both Palouse Prairie habitat areas and rare plant locations were identified in the field. Both of these types of resource occurrences will be considered for avoidance, and flagged appropriately to ensure they are not disturbed if complete avoidance can be achieved.</p> <p>Please refer to the response to Comment 87 (WNPS-2).</p>	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>206</b> <b>PPF-3</b>	Plant Survey	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"The Palouse Prairie Foundation objects to the quality of the surveys performed; the mitigation proposals; harm to be done to birds, bats, insect pollinators, and other native animals; the harmful health effects on residents (humans and other animals) from the generation of the electricity; sociological aspects; and economic issues."	Surveys for avian species, bats, and other wildlife as well as plants, and wetlands were performed according to accepted scientific protocols and will be updated as needed prior to final site plan approval by Whitman County. The results of these surveys and mitigation measures for any potential impacts to the natural or built environment are presented clearly in the applicable sections of the DEIS.	No change to text required.
<b>207</b> <b>PPF-4</b>	Granite Knob	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	<p>"The DEIS states that 'One area surveyed on the east on Granite Knob is a high quality area of Palouse prairie habitat that should be avoided, if possible' yet on the DEIS survey map (DEIS Figure 2), they show several tower locations on the Palouse Prairie remnant mapped on Granite Knob (figure 1). These tower locations should be abandoned altogether in order to protect this high quality Palouse Prairie.</p> <p>At least four tower locations along the transmission line running just south of the Granite Knob location are immediately adjacent to mapped Palouse prairie remnants (figure 1). These towers should be abandoned or moved so as to do no damage to the remnants during construction or operation.</p> <p>Similarly, two proposed tower locations are shown immediately adjacent to a mapped Palouse Prairie remnant south of Sheahan Road (figure 2); these should be moved or abandoned."</p>	Please refer to the responses to Comment 87 (WNPS-2), Comment 49 (KIE-12), and Comment 58 (KIE-21).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>208</b> <b>PPF-5</b>	Restoration	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"It is unlikely that full ecological function will be restored. Perhaps plants can be restarted in the area, but the soil and other parts and functions of the area will no doubt be damaged more permanently."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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<b>209</b> <b>PPF-6</b>	Plant Survey	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"A short sampling period was used for the plant field surveys during a year of unusual weather. Some of the endangered/threatened species don't come up or bloom every year (they exhibit 'prolonged dormancy') [See, for example, Lesica, P.; Crone, E.E. 2007. Causes and Consequences of Prolonged Dormancy for an Iteroparous geophyte, <i>Silene spaldingii</i> . Journal of Ecology 95:1360-1369]."	All plant surveys were conducted at species-appropriate bloom times for the special status species likely to occur in the vicinity of the Proposed Action. These surveys adhered to protocols developed by the Washington Natural Heritage Program (WNHP) as well as to other applicable state and federal regulations pertaining to threatened or endangered species.  Please refer to the response to Comment 206 (PPF-3).	No change to the text required.
<b>210</b> <b>PPF-7</b>	GPE Survey	Wildlife	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"According to DEIS Section 3.3.4.1, Invertebrates, <i>Driloleirus americanus</i> (giant Palouse earthworm, or GPE) habitat has been identified as being present in the proposed construction site. However, no survey is presented for the GPE. The species is given only a hand-waving of suppositions, such as, 'Given the limited habitat and lack of occurrence records in the Proposed Action area, impacts to the species are unlikely as a result of Proposed Action construction.' [DEIS p. 3-35] and 'Potentially suitable habitat for the GPE is present within the Proposed Action area in remnant areas of Palouse prairie grassland that have not been disturbed by agricultural or other development activities. However, given the very limited and fragmented nature of the habitat together with the species' extreme rarity, it is unlikely this species is present in the Proposed Action area.' (emphasis ours) [DEIS p. 3-31]. These statements are conjecture. This species is under a status review by the U.S. Fish and Wildlife Service for endangered species listing and a scientific analysis should be done in the Environmental Impact Statement."	Please refer to the response to Comment 57 (KIE-20).	No change to the text required.
<b>211</b> <b>PPF-8</b>	Raptor Nest Survey	Wildlife	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"A raptor nest survey should be done. It is insufficient to say 'the lack of returns does not necessarily indicate that priority habitats and species are not present, but rather that data is not available.' [DEIS p. 6, 4.1 Information Reviews]"	Please refer to the response to Comment 46 (KIE-9).	No change to the text required.
<b>212</b> <b>PPF-9</b>	Raptor Nest Survey	Wildlife	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"A raptor nest density analysis should be done for the American Kestrel. Nest density was not studied because 'identification requires extensive ground-based surveys' [DEIS p. 3-29, Table 3.3-4]. The American Kestrel is a 'species of concern' and has a strong presence in the project area. It should not be dismissed due to perceived (or actual) difficulty in surveying."	Please refer to the response to Comment 50 (KIE-13).	No change to the text required.
<b>213</b> <b>PPF-10</b>	Nocturnal Studies	Wildlife	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"Nocturnal migratory studies should be done. 'Nocturnal migrants and raptors (owls) are challenging to survey in terms of mean use, thus no nocturnal surveys were conducted for the Proposed Action.' [DEIS p. 3-37] Nocturnal migratory studies should not be dismissed due to perceived (or actual) difficulty in surveying."	Please refer to the response to Comment 51 (KIE-14).	No change to the text required.
<b>214</b> <b>PPF-11</b>	Bat Mortality	Wildlife	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"Bat mortality is measured in the DEIS by collisions of bats with turbine blades. However, bat mortality related to wind turbines is generally caused by the sudden drop of air pressure (barotrauma) which induces death by burst lungs"	Please refer to the response to Comment 56 (KIE-19).	No change to the text required.
<b>215</b> <b>PPF-12</b>	Mitigation	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"The mitigation proposals in the draft EIS are problematic. 'The DEIS addresses the concerns of WNHP [Washington Natural Heritage Program] and demonstrates mitigation measures to avoid or reduce impacts to rare plants and Palouse prairie habitat.' [DEIS p. ES-13] But specified mitigation in the DEIS seems to focus on individual plants and not on the prairie habitat."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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<b>216</b> <b>PPF-13</b>	Mitigation	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	<p>"Avoidance or minimization of impacts to protected vegetation or protected plant species should be required.</p> <p>As complex as the Palouse Prairie is, it cannot be 'restored' by the mitigation practices (e.g., reseeding with native seeds) cited in the DEIS. Palouse Prairie Foundation members have worked on restoring Palouse Prairie since 1996 and, to date, we have been able to recreate only rough approximations of the original Palouse Prairie. To do more will take a tremendous amount of time, energy, dedication, and resources. Some of the parts (especially soil organisms) may be missing and we may never know what they were. This makes the existing remnants very valuable, as it is far easier and less expensive to preserve them than to restore them.</p> <p>Replanting of a protected individual plant likely will not succeed. Replanting with seed post-disturbance will not restore the area. The active disturbance may be temporary but the effects of the disturbance on the prairie habitat will be permanent."</p>	<p>Avoidance and minimization measures to protect vegetation and special status plant species have been implemented from the start of the Proposed Action design process. Layout of Proposed Action facilities has been revised several times to avoid sensitive areas. As part of the final Facility design, micrositing will be implemented such that further slight relocations of Proposed Action facilities may be made to further avoid impacts to sensitive areas.</p> <p>Please refer to the response to Comment 87 (WNPS-2).</p>	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>217</b> <b>PPF-14</b>	Mitigation	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	<p>"As part of the conditional use permitting process, the county could require that native prairie lands in the project area or elsewhere either be purchased by the developer and be turned over to the local land trust, or, as a part of the lease agreement, the landowners could be required to put their native prairie lands into an approved conservation easement.</p> <p>The Palouse Land Trust works with landowners in Whitman and Latah Counties and surrounding areas to put Palouse prairie remnants and other important lands into conservation easements."</p>	<p>Palouse Wind has committed to providing mitigation for temporary and permanent impacts to habitats according to the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) (see DEIS Section 3.2.6, page 3-22). This will include mitigation for impacts to native prairie lands. Once the Facility layout has been finalized, and actual acreage impacts have been established, Palouse Wind will prepare a Habitat Mitigation Plan. During the preparation of this plan, Palouse wind will consider mitigation opportunities available, and will consult with WDFW to determine which measures are acceptable under the terms of the WDFW <i>Wind Power Guidelines</i>. Such measures may include conservation easement opportunities, as stated in the comment.</p> <p>Please refer to the response to Comment 87 (WNPS-2).</p>	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>218</b> <b>PPF-15</b>	Revegetation	Vegetation	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	<p>"Although it does not recreate a native habitat, all revegetation of land disturbed by tower and road construction should be done with approved native plants. Likewise during deconstruction of the project."</p>	<p>Areas temporarily disturbed by construction activities will be revegetated with appropriate seed mixes (i.e. if Conservation Reserve Program [CRP] areas are disturbed, the area will be revegetated with CRP species) to be obtained from a qualified cultivator.</p> <p>Seed mixes for areas enrolled in the CRP program will be selected to meet U.S. Department of Agriculture (USDA) requirements for the contracted parcel. The seed mixes used for revegetating CRP lands will be included in the Habitat Mitigation Plan.</p> <p>Please refer to the response to Comment 87 (WNPS-2).</p>	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>219</b> <b>PPF-16</b>	EMF	Health and Safety	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	<p>"The health effects of the generation and transmission of clean electricity is noted in the DEIS, which states that 'there is no causal relationship between exposure to extremely low frequency EMF associated with 60 Hz electrical facilities and adverse effects to human health' [DEIS p. 3-131]. (This statement may be true, but see check out the report of the Bioinitiative Working Group, an international collaboration of prestigious scientists and public health policy experts, that details the toxic effects of EMFs from all sources.)"</p>	<p>The Bioinitiative Working Group is an ad hoc group of people who assembled to make a case that EMF is a health threat. Their report was co-edited by David Carpenter and Cindy Sage, who have both been active in this subject for many years. The Bioinitiative Working Group report is contrary to those from many other scientific organizations that convened scientific review panels, including the National Academy of Sciences, the National Institute of Environmental Health Sciences, and the World Health Organization. Accordingly, the views of the Bioinitiative Working Group are not shared by the majority of the scientific community.</p>	No change to the text required.

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<b>220</b> <b>PPF-17</b>	EMF	Health and Safety	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"The electrical transformer and transmission system must be designed properly so as to not generate 'dirty electricity' – high frequency spikes in the transmission lines. The project must use converters that generate a pure 60 Hz sine wave. In addition, transmission lines must be installed so as not to use the earth as a ground return. Dirty electricity has been linked to increased cancer and other health problems in humans. The use of the earth as a ground return circuit would most likely have a detrimental effect on ground-dwelling animals (such as native earthworms and insects) as well as on the people above-ground, particularly those who live in the area. The cleanliness and environmental impact of the generated electricity should be divulged."	Please refer to the responses to Comments 152 (HAL-7) and 155 (HAL-10). Palouse Wind will use standard utility practices to electrically connect the wind turbines to each other and to the grid. This will include a neutral in the collector lines that bring the power to the substation and no neutral in the transmission tie line that exits the substation. Transmission lines need no neutral since the phase currents in the transmission line are balanced at the substation resulting in no current that would flow on a neutral if one were present. No extraordinary equipment is needed to generate a pure 60-Hz sine wave or to filter any transients from the 60-Hz power produced by Palouse Wind.	No change to the text required.
<b>221</b> <b>PPF-18</b>	Decommissioning	General	David Hall Palouse Prairie Foundation Moscow ID 83843	Dec. 20, 2010	"Although seemingly not a direct 'Environmental Impact,' one must consider whether the project has a hope of being completed and providing power. If the company is on unstable ground, then the project should not be allowed. It would be horrible to start development, and fail, without fulfilling mitigation requirements, or ever producing any power. The company must be bonded or have some equivalent guarantee that mitigation and clean-up will be funded."	Please refer to the response to Comment 60 (KIE-23).	No change to the text required.
<b>222</b> <b>SET-1</b>	Benefit to Agriculture	Land Use and Agriculture	Raymond A. Setters Buckeye, AZ 85396	Dec. 20, 2010	"My family has been farming wheat in Whitman County since the 1930's. Though the ebbs and flow of market fluctuation, natural disasters, and the constant increase in price for fuel and fertilizer, farming can be a constant struggle. Harnessing the power of wind on our farm is common sense. It's a novel approach for generating electricity for consumers and revenue for Whitman County and allows us to diversify the crops we harvest."	Comment noted.	No change to the text required.
<b>223</b> <b>SET-2</b>	Energy Diversification	Energy and Natural Resources	Raymond A. Setters Buckeye, AZ 85396	Dec. 20, 2010	"Whitman County has an opportunity to be part of a win-win project that contributes 100 MW of renewable electricity to the region. Approving the DEIS will allow Whitman County to contribute to the energy-demand solution as opposed to just being part of the problem."	Comment noted.	No change to the text required.
<b>224</b> <b>SET-3</b>	Economic Impacts	Socioeconomics	Raymond A. Setters Buckeye, AZ 85396	Dec. 20, 2010	"As indicated by the DEIS, over 160 construction jobs, and 18 operations jobs will be created by the Palouse Wind project. In addition, the local impacts for Whitman County are estimated to be \$11.3 million for the construction phase and \$1.1 million per year for the 30-year operations phase. In these hard economic times, it is more important than ever to jump at this opportunity for an additional source of revenue."	Comment noted.	No change to the text required.
<b>225</b> <b>SET-4</b>	DEIS Analysis	General	Raymond A. Setters Buckeye, AZ 85396	Dec. 20, 2010	"We appreciate the hard work you put into creating the County's Wind Ordinance and feel that it provides the perfect balance of protecting my private property rights to place wind turbines on my property and the rights of the citizens around me. The DEIS addresses the wind ordinance extensively and is in full compliance with the measures outlined in detail in the ordinance."	Comment noted.	No change to the text required.
<b>226</b> <b>SET-5</b>	Supports Project	General	Raymond A. Setters Buckeye, AZ 85396	Dec. 20, 2010	"We urge you to approve the Palouse Wind Draft EIS, and do so in a timely fashion. It's an important project that we have confidence will be done right."	Comment noted.	No change to the text required.

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<b>227</b> <b>SKI-1</b>	Prairie Habitat/ Vegetation	Vegetation/ Habitat	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"No Palouse Prairie should be damaged in any way either during construction or operation of the wind facility. No towers, roads, transmission lines, or any other parts of the facility should be placed where they will cause damage to any Palouse prairie remnants on this site."	Please refer to the response to Comment 147 (HAL-2).	No change to the text required.
<b>228</b> <b>SKI-2</b>	Restoration	Vegetation	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"Restoration efforts thus far have been able to recreate only rough approximations of the original prairie. Damaged prairie cannot simply be repaired by seeding 'native grasses' as is suggested in the DEIS. The mitigation suggested in the DEIS is totally inadequate and inappropriate. If damage cannot be avoided, the company should purchase other good quality remnant land either on or off site and place in a land trust to protect it."	During the development of the Habitat Mitigation Plan, Palouse Wind will consult with WDFW to determine the mitigation measures that are acceptable under the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009). Should habitat restoration be one of them, Palouse Wind would contract with the appropriate specialist to design restoration measures that would have a reasonable rate of success.  Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>229</b> <b>SKI-3</b>	Palouse Prairie	Vegetation	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"Presence or absence of rare plants should not be the determining factor in whether a prairie remnant is valuable. Because of the rarity of the ecosystem, all of the remnants are valuable, whether or not they contain rare plants."	DEIS Section 3.2.1.1 describes the methodologies used to identify habitats (including native grasslands and prairie remnants). Habitat types were mapped based on visual observations from a road or high point, and confirmed by field-walking. Wildlife biologists with experience in the eastern Washington Columbia Plateau Ecoregion conducted this work. Separate surveys were also conducted to specifically identify the presence of rare plants (see DEIS Section 3.2.1.2). During these surveys, a landscape-level survey was conducted in the field to identify non-agricultural areas with permanent vegetative cover. These areas deemed to be Palouse Prairie remnants were subjected to a more complete review for rare plants, as described in DEIS Appendix D, <i>Special Status Species Plant Survey for the Palouse Wind Project, Whitman County, Washington</i> . DEIS Appendix D lists all the plant species observed during the rare plant survey in the prairie remnants. As indicated on DEIS page 3-13, all Native Perennial Grassland habitat was assigned a "high" value because of its overall species diversity and because they provide opportunities for preservation of native plant species.	No change to the text required.
<b>230</b> <b>SKI-4</b>	Rare Plants	Vegetation	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"The sampling procedure for the rare plant survey is inadequate. The surveys were conducted over a short time period late in the summer. Many of the native Palouse Prairie plants are adapted to dry summers of the Palouse and are dormant by that time. Dormant plants are difficult to locate."	Comment noted. Please refer to the response to Comment 209 (PPF-6).	No change to the text required.
<b>231</b> <b>SKI-5</b>	Habitat Surveys	Vegetation	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"Portions of Granite Knob were not adequately surveyed because the landowner did not grant permission. If the landowner will not cooperate with the permitting process and the EIS, the land should not be included in the project."	Comment noted. Please refer to the responses to Comment 87 (WNPS-2)147 (HAL-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>232</b> <b>SKI-6</b>	Nocturnal Surveys	Wildlife	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"Surveys should be conducted for night flying birds and bats. Because 'nocturnal migrants and raptors (owls) are challenging to survey' as stated in the DEIS does not mean they should not be attempted. Using data extrapolated from other projects in other areas is not acceptable."	Please refer to the response to Comment 51 (KIE-14).	Please refer to the revisions based on the response to Comment 51 (KIE-14).

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<b>233 SKI-7</b>	Revegetation	Vegetation	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"Species native to the Palouse should be used to revegetated [sic] any land disturbed during the construction process. This includes but is not limited to tower sites, roads, transmission lines, whether buried or above-ground."	The areas temporarily disturbed by construction activities will be revegetated with seed mixes appropriate to the habitat impacted. Areas that were in active cultivation will be seeded with species selected in consultation with the landowner. Areas enrolled in the CRP will be re-seeded with seed mixes approved by USDA. Impacts to native habitats will be mitigated according to WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) and may include seeding with appropriate mixes.  Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>234 SKI-8</b>	Health and Safety	Health and Safety	David M Skinner Moscow, ID 88843	Dec. 20, 2010	"It is my understanding that the permit applicant, First Wind, is experiencing financial difficulties. Because of that, the temptation to take shortcuts both in environmental protection and worker safety may be stronger than usual for this project. The permitting process, the CUP, the Whitman County Commissioners, and any other regulatory agencies should play close attention to the construction process to assure that proper procedures are followed regarding safety of workers, safety of the public or environmental protection."	Comment noted. Enforcement according to applicable laws and regulations is the appropriate mechanism for addressing future assertions of the Proposed Action's noncompliance with local, state, or federal approvals.	No change to the text required.
<b>235 SRR-1</b>	Supports Project	General	William Evans Snake River Ranches Lacrosse, WA 99143	Dec. 20, 2010	"Please don't stand in the way of farmers that want to harvest a renewable and green resource. I encourage you to approve the DEIS and help get the Palouse Wind project off the ground."	Comment noted.	No change to the text required.
<b>236 SRR-2</b>	County Support	General	William Evans Snake River Ranches Lacrosse, WA 99143	Dec. 20, 2010	"The majority of residents in Whitman County want wind energy companies in the area. The commissioners did their due diligence and listened to all of the ludicrous reasons cited by the opposition against the installation of turbines. Extensive studies have been completed on the noise, light obstruction, and change to the character of the land. All of these factors have been proven to be minimal or non-existent."	Comment noted.	No change to the text required.
<b>237 SRR-3</b>	Turbine Appearance	Visual	William Evans Snake River Ranches Lacrosse, WA 99143	Dec. 20, 2010	"I can see a Wind Farm from my property. In my opinion, the spinning turbines are not anymore unsightly than the cell towers, grain elevators, or power lines that exist today."	Comment noted.	No change to the text required.
<b>238 SRR-4</b>	Energy Diversification	Land Use / Energy and Natural Resources	William Evans Snake River Ranches Lacrosse, WA 99143	Dec. 20, 2010	"I believe the wind turbines represent an evolution in land use development and a commitment by patriotic citizens to answer our nation's dependency on foreign oil."	Comment noted.	No change to the text required.
<b>239 SRR-5</b>	Energy Diversification	Socioeconomics	William Evans Snake River Ranches Lacrosse, WA 99143	Dec. 20, 2010	"Adding wind turbines to the skyline of the Palouse is a price worth paying to boost revenue and increase job opportunities in the County."	Comment noted.	No change to the text required.
<b>240 DEVA-1</b>	Supports Project	General	Della Evans LaCrosse, WA 99143	Dec. 20, 2010	Support postcard: "The Palouse Wind Project will provide an economic impact for Whitman County. I support the project."	Comment noted.	No change to the text required.
<b>241 SMI-1</b>	Supports Project	General	Cliff Smith Tekoa, WA 99033	Dec. 20, 2010	Support postcard: "More jobs are a plus to Whitman County. Non-smokestack industry is needed!"	Comment noted.	No change to the text required.
<b>242 LWEB-1</b>	Supports Project	General	LeeAnna Webley Cheney, WA 99004	Dec. 20, 2010	Support postcard: "I want wind energy in Whitman County."	Comment noted.	No change to the text required.

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<b>243</b> <b>SWEB-1</b>	Supports Project	General	Shann Webley LaCrosse, WA 99143	Dec. 20, 2010	Support postcard: "Please approve DEIS for the Palouse project. I support renewable energy in Whitman County."	Comment noted.	No change to the text required.
<b>244</b> <b>VOG-1</b>	Notice	DEIS Process	William O. Vogel Olympia, WA	Dec. 20, 2010	"I contacted Jared Webley over 2 months ago. He promised to keep me apprised. I have heard nothing until reading a paper in Colfax today."	Please refer to the response to Comment 38 (KIE-1).	Please refer to the revisions based on Comment 38 (KIE-1).
<b>245</b> <b>VOG-2</b>	Comment Period Extension	General	William O. Vogel Olympia, WA	Dec. 20, 2010	"I will be out of e-mail and cell phone coverage along the Grande Ronde until Dec 23. I believe I have grounds to request an extension until Jan 31 to obtain, read, and Comment on the DEIS."	Comment noted.	No change to the text required.
<b>246</b> <b>VOG-3</b>	Economic Impact	Socioeconomics	William O. Vogel Olympia, WA	Dec. 20, 2010	"There is a tremendous economy in Whitman County from photo tours to photograph the rolling landscape. People from all over the world spend millions in the county each year. There are dozens of companies that offer such tours plus people that come on their own. They stay in motels and eat in restaurants. Not everyone that has an intense interest in the Palouse lives here during all of the year"	Comment noted. Please refer to Section 3.16, Socioeconomics, and Appendix I, <i>Economic Impacts of the Proposed Palouse Wind Project</i> (Yoder, 2010). The DEIS text will be revised as indicated.	A new subsection called "Impacts to Tourism" will be included in DEIS Section 3.16.4.2, after "Impacts to Property Values" and prior to the "Decommissioning Impacts" subsection (page 3-206).  DEIS Section 4.17 will include the following references:  <u><i>Dean Runyan Associates. 2010. Washington State County Travel Impacts 1991-2009. Prepared for Washington State Department of Commerce. September</i></u>  <u><i>Hall, Mike, Douglas L. Young, David J. Walker. 1999. Agriculture in the Palouse. A Portrait of Diversity. Bulletin 794. University of Idaho, College of Agriculture, Cooperative Extension System. February.</i></u>
<b>247</b> <b>WIL-1</b>	Supports Project	General	Eric Williams Cheney, WA 99004	Dec. 20, 2010	"Taken in total, your DEIS demonstrates how Palouse Wind is an excellent project for Whitman County and all of Washington. Here are a few of the ways:  <ul style="list-style-type: none"> <li>• Helps reduce our dependence on foreign energy</li> <li>• Provides good construction followed by family wage permanent jobs</li> <li>• Increases the County's (and thus local schools') tax base</li> <li>• More than adequately addresses the any environmental concerns</li> <li>• More than adequately addresses any noise concerns"</li> </ul>	Comment noted.	No change to the text required.
<b>248</b> <b>WIL-2</b>	Noise	Noise	Eric Williams Cheney, WA 99004	Dec. 20, 2010	"I particularly want to note that [sic] the DEIS's proper treatment of noise. Some critics of wind energy have glommed on to often inaccurate or misleading studies regarding noise to make specious arguments in opposition. As you know, under SEPA, a critic simply raising an issue does not constitute stopping or delaying a project - particularly when the DEIS addresses that issue. The impacts have been disclosed and addressed. Well done."	Comment noted.	No change to the text required.
<b>249</b> <b>WSDOT-1</b>	Mitigation	Transportation	Greg Figg Washington State Department of Transportation Spokane, WA 99207	Dec. 20, 2010	"The DEIS identifies the site will employ about 200 workers during the peak construction period which will generate about 350 vehicle trips per day. This would be in addition to the 50 trucks per day that will also access the site. The majority of these vehicles will turn left to access the site from US 195, which has a posted speed limit of 60 MPH. The three proposed site access roadways; Baird Road, Trestle Creek Road, and Finch Road do not have left turn channelization on US 195.	Palouse Wind will consult with Washington State Department of Transportation (WSDOT) regarding temporary construction traffic and the need for managing left turns on US 195 safely. Palouse Wind will work with WSDOT and the County to identify solutions and develop a traffic management plan to meet all needs.	DEIS Section 3.13.4.1, paragraph 1 (page 3-165) will be revised as follows:  <i>Potential impacts that could result from construction of the Proposed Action are evaluated in this section. Vehicle trip generation was estimated based on the number of turbines and the expected construction materials and equipment needed for the Proposed Action. Truck estimates for</i>

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					<p>The advance warning signs that are proposed in the DEIS for US 195 to address these left turns are not adequate mitigation for this project. The EIS needs to evaluate the warrants for left turn channelization and other improvements to accommodate the projected traffic volumes. WSDOT Design Standards need to be referenced to determine if improvements to these intersections are required,</p> <p>Based on the project description the majority of the traffic generated by this project will be temporary in nature lasting less than one year. This fact can also be addressed in the EIS."</p>		<p><i>turbines, cranes, concrete, gravel, and electrical materials were provided by the Facility owner. <u>The majority of traffic generated by the Proposed Action will be temporary in nature, lasting less than 1 year.</u></i></p> <p>DEIS Section 3.13.6, bullet 1, between the 4th and 5th ticks (page 3-168) will be revised to include the following:</p> <p>- <u>Palouse Wind will evaluate the need for left-turn channelization, turning radii enhancements relative to US 195 intersections, and other improvements to accommodate the projected traffic volumes on US 195 based on USDOT's Manual on Uniform Traffic Control Devices, Part 6 – Temporary Traffic Control and WSDOT's Design Manual, Chapter 10 – Work Zone Safety and Mobility. Palouse Wind will consult with Whitman County and WSDOT in developing the Traffic Management Plan to ensure traffic concerns are addressed.</u></p>
<b>250 WSDOT-2</b>	Additional Information	Transportation	Greg Figg Washington State Department of Transportation Spokane, WA 99207	Dec. 20, 2010	"Some of the trucks that will be entering and exiting the site will be either over length or over width, the turning radii of these trucks needs to be addressed relative to the US 195 intersections. Additionally, identify and evaluate the speed of the vehicles completing turns, as some large loads turn very slowly."	Included in the preparation of the Palouse Wind Traffic Management Plan, trucks entering and exiting US 195 will be evaluated for the necessary turning radii. Vehicle speeds, while turning, will be determined and evaluated based on WSDOT's <i>Design Manual</i> , Chapter 1240 -Turning Roadways. Please refer to the response to Comment 249 (WSDOT-1).	Please refer to the revisions based on Comment 249 (WSDOT-1).
<b>251 DAHP-1</b>	Regulatory Requirements	Cultural Resources	Gretchen Kaehler Department of Archaeology & Historic Preservation Olympia, WA 98501	Dec. 21, 2010 (Note: received after the DEIS comment period ended)	<p>"Pg. 1 states that cultural resources survey in progress 'will meet the requirements of Section 106 of the national Historic Preservation Act and consider the potential impacts to historic properties.' We were not aware that this project had a federal nexus, rather, that the project fell under the State Environmental Protection Act (SEPA) and state laws protecting archaeology and human remains.</p> <p>The term 'historic properties applies to Section 106 projects and resources that have been determined eligible by the lead agency. If there are no federal funds or permits involved in the project, the use of Section 106 language is not warranted. State laws RCW 27.53, RCW 27.44, and RCW 68.60 will apply to any resources and/or human remains identified. Survey reports must be submitted in their entirety to DAHP and the interested Tribes for review. DAHP must make determinations on the eligibility of historic archaeological resources. All precontact resources are protected and must be avoided or a permit must be obtained from DAHP if they are to be impacted. Please make sure that survey reports and recommendations made for managing cultural resources reflect the correct regulatory requirements."</p>	Please refer to the response to Comment 26 (YAK-1).	No change to the text required.
<b>252 DAHP-2</b>	Cultural Surveys	Cultural Resources	Gretchen Kaehler Department of Archaeology & Historic Preservation Olympia, WA 98501	Dec. 21, 2010 (Note: received after the DEIS comment period ended)	"We recommend that the entire project area be surveyed rather than just the micro-siting corridor. Designating micro-siting corridors for cultural resources survey prior to construction has proven problematic in the past in that it does not allow for construction deviation into unsurveyed areas should that become necessary."	Please refer to the response to Comment 28 (YAK-3).	No change to the text required.

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<b>253</b> <b>COOP-1</b>	DEIS Analysis	General	Rick L. Winters Cooperative Schools St. Johns, WA 99171	Dec. 20, 2010	"The study for the DEIS presents a thorough analysis of potential impacts to both the natural and man-made environments in Whitman County resulting from the construction, operation and decommissioning of the Palouse Wind Project."	Comment noted.	No change to the text required.
<b>254</b> <b>COOP-2</b>	Economic Benefits	Socioeconomics	Rick L. Winters Cooperative Schools St. Johns, WA 99171	Dec. 20, 2010	"The economic impacts, including jobs, taxes, and economic diversification, will be substantial."	Comment noted.	No change to the text required.
<b>255</b> <b>COOP-3</b>	Economic Benefits	Land Use and Agriculture / Socioeconomics	Rick L. Winters Cooperative Schools St. Johns, WA 99171	Dec. 20, 2010	"Wind farm projects, such as Palouse Wind, provide farmers and other landowners, another income stream that enables them to diversify and pass on their holdings."	Comment noted.	No change to the text required.
<b>256</b> <b>ROY-1</b>	Supports Project	General	Bob Royer Seattle, WA 98121	Dec. 22, 2010 (Note: received after the DEIS comment period ended)	Support postcard: "Our family strongly supports renewable energy such as wind power. We are also aware that wind projects create significant benefits to county governments."	Comment noted.	No change to the text required.
<b>257</b> <b>WEI-1</b>	Supports Project	General	Julia Weisenburger Seattle, WA 90117	Dec. 22, 2010 (Note: received after the DEIS comment period ended)	Support postcard: "Clean, safe, efficient...that makes sense for now and the future."	Comment noted.	No change to the text required.
<b>258</b> <b>WIC-1</b>	Supports Project	General	Emily Wicks Seattle, WA 98119	Dec. 22, 2010 (Note: received after the DEIS comment period ended)	Support postcard: "Palouse Wind is doing some great things! When I drive back to WSU for homecoming it's thrilling to see the hardwork and the move toward energy efficiency!"	Comment noted.	No change to the text required.
<b>259</b> <b>RWEI-1</b>	Supports Project	General	Rob Weisenburger Seattle, WA 98117	Dec. 23, 2010 (Note: received after the DEIS comment period ended)	Support postcard: "I do support wind energy. As a hunter and fisherman of Eastern Washington I want to see more of this power generated to keep the environment clean."	Comment noted.	No change to the text required.
<b>260</b> <b>WDFW-1</b>	SEPA Study Area	General	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	Dec. 23, 2010 (Note: received after the DEIS comment period ended)	"The DEIS identifies both a Proposed Action Area and a SEPA Study Area. Based on our review, it is not clear, as well as confusing, why a SEPA Study AREA was delineated, since the project will only occur within the Proposed Study Area, and likely the Steam Shovel Expansion Area...We would argue that that Section 3 does not describe the SEPA Study Area, only the Proposed Study Area...WDFW has not encountered any other wind power projects that identify a SEPA Study Area; only project boundaries and proposed action areas within the boundaries. Therefore, WDFW recommends that further revisions of the EIS omit the depiction of the SEPA Study Area from any figures and references to it in any text, unless by doing so would be inconsistent with SEPA standards."	Please refer to the responses to Comment 168 (HOC-9). The SEPA Study Area was removed from all Proposed Action figures in the March 2011 DEIS Addendum.	No change to the text required.

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<b>261</b> <b>WDFW-2</b>	Temporary Impacts	Vegetation	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	Dec. 23, 2010  (Note: received after the DEIS comment period ended)	"It is our concern that temporary impacts will represent permanent impacts in these types of sensitive native habitats. In the recent meeting we discussed collaborative micro-siting as a means to eliminate any impacts to these areas and we look forward to these discussions and field visits. At this point in time, WDFW recommends that there be no impacts to native perennial grasslands (Palouse Prairie)."	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>262</b> <b>WDFW-3</b>	Revegetation	Vegetation	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	Dec. 23, 2010  (Note: received after the DEIS comment period ended)	"Impacts to CRP lands are typically re-seeded [sic] with an appropriate CRP seed mix and WDFW would like to be consulted as to the mix used."	Please refer to the responses to Comment 73 (WDOE-1), Comment 87 (WNPS-2), and Comment 233 (SKI-7).	Please refer to the revisions based on the response to Comment 73 (WDOE-1) and Comment 87 (WNPS-2).
<b>263</b> <b>WDFW-4</b>	Avian Fatality Rates	Wildlife	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	Dec. 23, 2010  (Note: received after the DEIS comment period ended)	"In Table 5 of the Ecological Baseline Studies, mean avian use was highest at survey plots A, C and F, even though plot F had only two seasons (Spring and Summer) and plots A and C had four seasons of data. While the proposed project site (5.38) had '...substantially lower avian mean use than either Stateline (13.1) or Hopkins Ridge (8.4)...' this does not reduce the likelihood that fatality rates may be higher at the proposed project site in comparison to these other projects. In contrast, on page 13 of the Ecological Baseline Studies states, 'estimated fatalities would be expected to be lower than either Stateline (Erickson et al., 2004) (2.9/MW/Year) or Hopkins Ridge (Young et al., 2009) (1.2/MW/Year)'."	Please refer to the responses to Comment 49 (KIE-12), Comment 55 (KIE-18), and Comment 195 (PAS-1).	No change to the text required.
<b>264</b> <b>WDFW-5</b>	Avian Use Data	Wildlife	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	Dec. 23, 2010  (Note: received after the DEIS comment period ended)	"WDFW previously expressed a need for the collection of avian use information during the winter months. The 2009 surveys were stopped after January 9th and winter 2010 was a [sic] El Nino year which led to a mild non-typical Eastern Washington winter. WDFW District Wildlife Biologist, Howard Ferguson, conducted a study which indicates that the West Plains experience high winter raptor use during winters with cold temperatures in the north. These cold temperatures push the birds south into habitats that offer foraging opportunities. WDFW is concerned that the lack of data collection during typical winter conditions will result in an inaccurate mortality estimate during operation. WDFW raised this concern again during the December 6th meeting with First Wind. WDFW recommends that the proponent conduct these additional raptor surveys to better understand winter-time raptor use and abundance in the project area, and recommend that these surveys be initiated soon."	Please refer to the response to Comment 48 (KIE-11).	Please refer to the revisions based on the response to Comment 48 (KIE-11).
<b>265</b> <b>KAR-A-1</b>	Overview	General	Karl and Associates; Pullman, WA	March 3, 2011	"These comments are directed at the proposed Conditional Use Permit being considered by Whitman County per a request by First Wind Energy LLC of Massachusetts. Information about this project was derived from the Draft Environmental Impact Statement (DEIS) for the Palouse Wind Energy Project. These comments are also pertaining to the inadequacy of the DEIS as a disclosure document."	Comment noted.	No change to the text required.
<b>266</b> <b>KAR-A-2</b>	Overview	General	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS indicates that First Wind has not taken necessary steps to disclose all the facts to citizens of Whitman County or other citizens in the State of Washington. They have not taken all reasonable measures to avoid or minimize the impacts to wildlife (and specifically to migratory birds, as required by law)."	Comment noted. See Table ES-3, Summary of Impacts and Proposed Mitigation Measures for the Palouse Wind Project, for a detailed description of impacts and mitigation measures.	No change to the text required.

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<b>267</b> <b>KAR-A-3</b>	Overview	General	Karl and Associates; Pullman, WA	March 3, 2011	"They have understated the negative effects of this project, and overstated any benefits. We encourage Whitman County to deny this Conditional Use Permit and preserve the character of our valued landscapes and County character."	Comment noted. Please refer to the response to Comment 266 (KAR-A-2). Development of a commercial wind-energy generating facility is allowed under the Whitman County Zoning Code as a conditional use.	No change to the text required.
<b>268</b> <b>KAR-A-4</b>	Availability of Documents	General	Karl and Associates; Pullman, WA	March 3, 2011	"The documents were not generally available and First Wind was not forthcoming in responding to requests for information. We are aware of several people that did not receive notification of the open comment period despite requests made in advance."	Whitman County followed the notice procedures required by Whitman County Code (WCC) 9.04.020, "SEPA Guidelines Adopted by Reference," and the sections of Washington Administrative Code (WAC) 197-11-510, "Public Notice," adopted by reference. The distribution of notice regarding all stages of review of the Proposed Action under SEPA was addressed in the Executive Summary (page ES-5) of the November 2010 DEIS, the Fact Sheet (page i) of the March 2011 DEIS Addendum, and the Executive Summary (ES-2) of this FEIS. Copies of documents related to Palouse Wind's Application for Conditional Use Permit and the County's review under SEPA were duly posted to the County's Web site ( <a href="http://www.whitmancounty.org/page.aspx?pn=Planning+Division">http://www.whitmancounty.org/page.aspx?pn=Planning+Division</a> ). Hard copies and electronic versions (CDs) of the EIS and CUP documents were made available at the public libraries in Colfax, Oakesdale, and Rosalia. Public Notices were published in the <i>Whitman County Gazette</i> , and mailed to over 240 recipients representing tribal, local, state, and federal agencies, nongovernmental organizations, and private citizens.	The DEIS Executive Summary (pages ES-6 to ES-8) has been updated to include the public notice and involvement activities that have occurred since issuance of the DEIS. Please see page ES-4 of the FEIS for a list of updated efforts.
<b>269</b> <b>KAR-A-5</b>	Availability of Documents	General	Karl and Associates; Pullman, WA	March 3, 2011	"On its website, First Wind claims it is <i>"committed to developing our wind energy projects responsibly and openly. We work diligently to ensure that each one of our projects is in full compliance with all local, state, and federal regulations."</i> This is apparently not the case."	Comment noted. Please refer to the response to Comment 268 (KAR-A-4).	No change to the text required.
<b>270</b> <b>KAR-A-6</b>	Availability of Documents	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Contrary to the DEIS, Palouse Wind has not been working with the U.S. Fish and Wildlife Service. We contacted their headquarters in Olympia, Washington. They claim the U.S. Fish and Wildlife Service never received any documents from Palouse Wind and have not been involved in any discussions with them (William Vogel pers. comm. February 17, 2011)."	The U.S. Fish and Wildlife Service (USFWS) has been aware of the Palouse Wind Project since November 2009, at which time the USFWS addressed correspondence to First Wind, LLC. This correspondence is documented in a letter from the USFWS Office of Law Enforcement, dated November 4, 2009. As requested, First Wind provided USFWS with additional information by letter dated December 9, 2009. Palouse Wind has been in contact with the regional USFWS biologist since early 2010. The following contacts with the USFWS biologist were made by Palouse Wind staff: phone contact on February 23, 2010 to invite USFWS staff to a site visit by regulatory agencies of the Proposed Action area ; by e-mail on November 23, 2010, informing USFWS staff of the issuance of the DEIS for public comment, and inviting USFWS to contact Palouse Wind staff to discuss the Proposed Action; by phone on March 8, 2011 to update USFWS staff on the Proposed Action relative to Whitman County's issuance of the DEIS Addendum, and a follow up by e-mail on March 9, 2011.  Whitman County also included the USFWS Washington State Field Office headquarters on notices related to the CUP application and SEPA environmental review. A Notice of Addendum from Whitman County (sent via e-mail on February 24, 2011), was sent to USFWS staff. USFWS staff were also provided with a CD of the DEIS Addendum (mailed via U.S. Postal Service on March 2, 2011). No mail addressed to USFWS sent by Whitman County, or by CH2M HILL on the County's behalf, was returned as undeliverable.	No change to the text required.

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271 KAR-A-7	Legal Citations and Interpretations	General	Karl and Associates; Pullman, WA	March 3, 2011	"While it might seem that correct citations are trivial; they are indicative of the knowledge of the document writers, as well as the care they tend to put into their products. It also displays the lack of any involvement by the appropriate agencies."	Comment noted. Citations have been updated and revised for the FEIS.	See Section 4.0, References.
272 KAR-A-8	Legal Citations and Interpretations	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"On page 3-33, the citation for the Migratory Bird Treaty Act (MBTA) provided in the DEIS is wrong. The correct citation is 16 U.S.C. 703-711. This is because section 712 comes from the Fish and Wildlife Improvement Act (16 U.S.C. 7421 and others) not the Migratory Bird Treaty Act. The Fish and Wildlife Improvement Act contained amendments to numerous other laws."	Per the U.S. Fish and Wildlife Service (USFWS), the FEIS authors confirmed that the correct citation had been used. See: <a href="http://www.fws.gov/le/pdf/MBTA.pdf">http://www.fws.gov/le/pdf/MBTA.pdf</a>	No change to the text required.
273 KAR-A-9	Legal Citations and Interpretations	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"On page 3-33, the DEIS uses the misnomer "Bald and Golden Eagle Protection Act" which is not the correct name of that Act. The Bald Eagle Protection Act was amended on several occasions to add protections for and later to strengthen protections for golden eagles ( <i>Aquila chrysaetos</i> ) – but the name of the Act was never changed. It remains the Bald Eagle Protection Act."	Per the U.S. Fish and Wildlife Service (USFWS) Web site, the act is publicly referred to as the "Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c)." Please see following USFWS links: <a href="http://www.fws.gov/midwest/eagle/guidelines/bgepa.html">http://www.fws.gov/midwest/eagle/guidelines/bgepa.html</a> <a href="http://www.fws.gov/migratorybirds/mbpermits/regulations/BGEPA.PDF">http://www.fws.gov/migratorybirds/mbpermits/regulations/BGEPA.PDF</a>	No change to the text required.
274 KAR-A-10	Legal Citations and Interpretations	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	"On page 3-18, the DEIS states 'The National Oceanic and Atmospheric Administration (NOAA) Fisheries Division (formerly NMFS)'. The National Marine Fisheries Service has not changed their name and remains NMFS. NOAA-fisheries is a misnomer."	While the Northwest Regional Office retains the National Marine Fisheries Service name ( <a href="http://www.nwr.noaa.gov/">http://www.nwr.noaa.gov/</a> ), the following welcome message appears on the main page of the NOAA Web site ( <a href="http://www.nmfs.noaa.gov/">http://www.nmfs.noaa.gov/</a> ), "Welcome to NOAA's National Marine Fisheries Service (NOAA Fisheries Service). NOAA Fisheries Service is dedicated to the stewardship of living marine resources through science-based conservation and management, and the promotion of healthy ecosystems."	No change to the text required.
275 KAR-A-11	Legal Citations and Interpretations	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	"Also on page 3-18, the DEIS says with regard to the Endangered Species Act (ESA) (16 U.S.C. 1531 et seq.), 'Unlike animal species, listed plants receive protection only if they are on federal land.' This is also not true. Certain actions (i.e., removal or damage) with respect to endangered plants are prohibited not only on Federal lands, but are also prohibited when associated with trespass or when in violation of State law. Other actions are also prohibited such as the sale or transport of such plants, as well as violating any regulations pertaining to such species promulgated under section 4 of the ESA."	Comment noted. The FEIS text will be revised to clarify this distinction.	The end of the second paragraph of DEIS Section 3.2.3.1 (page 3-18) will be revised as follows:  <i>Unlike animal species, listed plants receive protection only if they are on federal land. This prohibition against "take" covers fish and wildlife but not plants [Cf. 16 U.S.C. § 1532(8) and § 1532(14)]. It is, however, illegal to remove an endangered plant from federal land and reduce it to possession. Removal or damage of federally listed plants is also prohibited when associated with knowing violation of any law or regulation of any state or in the course of any violation of a state criminal trespass law.</i>

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276 KAR-A-12	Legal Citations and Interpretations	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"On page 3-33, the DEIS states 'Although the Proposed Action would not be expected to result in a take or killing of migratory bird species within the meaning of the Act...', This is not true and Project Proponents making such a statement is a serious distortion of the facts. 'Take' is defined to include a number of actions including to kill migratory birds. According to 50 CFR 10.3, Take means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect. This project will kill birds and the Company and the County (through issuance of a Conditional Use Permit) would bear the potential liability of that 'take' with the Federal government. Therefore, the statement in the DEIS is a 'factual inaccuracy'. Such statements which are not accurate place the credibility and integrity of the proponent in question. Constructing or permitting the construction of turbines (that are known to kill golden eagles and other migratory birds) is in wanton disregard of the consequences."	The Proposed Action is not expected to take or kill birds protected under the Endangered Species Act or the Bald and Golden Eagle Protection Act. The Washington Department of Fish and Wildlife (WDFW) did not identify the site as a significant migratory corridor in the priority habitat data analyzed. Additionally, site-specific studies did not indicate that there was an increase in migratory bird use in the Proposed Action area. The mitigation measures outlined in DEIS Section 3.3.6.2 are proposed in part to avoid a take or kill of all protected species under applicable state and federal laws.	No change to the text required.
277 KAR-A-13	Scope	General	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS fails to consider that this project will contribute to the demand for high-power transmission lines and does not analyze the effects of additional high-power transmission lines in the County and other portions of the western U.S."	There is no evidence in the record and none known to the FEIS authors that the existing transmission system to which the electricity from this Proposed Action would be connected lacks capacity to receive such power. Furthermore, public documents obtained from Avista indicate that the existing Avista 230-kilovolt (kV) line proposed for interconnection has sufficient capacity to serve the Proposed Action (Avista, 2010). In addition, a representative from Avista Corps confirmed to an author of the FEIS that the existing line has adequate capacity to serve the Proposed Action (2011). <i>Avista Corps. 2010. Avista's 2011 Electric Integrated Resource Plan. PowerPoint presentation, delivered at Avista Headquarters, Spokane, WA. December 2.</i>  <i>Kalitch, Clint. 2011. Personal communication (phone call) between Clint Kalitch/Avista Corps and Marlina Guhlke/CH2M HILL regarding existing line capacity. March 21.</i>	No change to the text required.
278 KAR-A-14	Scope	Description of the Proposed Action	Karl and Associates; Pullman, WA	March 3, 2011	"It also did not adequately address the 3 to 4 miles of transmission lines needed to connect to the high-power transmission lines to the west."	The area that would surround the approximate 4 miles of transmission line (generator line) that is needed to connect to the high-power transmission lines to the west were given the same level of review as the remainder of the Proposed Action. Please refer to the DEIS appendixes and their figures as well as the DEIS Addendum, which include the generator line for special plant species, wetlands, habitat evaluation, cultural resources, visual resources, etc.  <ul style="list-style-type: none"> <li>• Figures 1 through 5 in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind</i>, prepared by Northwest Wildlife Consultants, Inc (NWC)</li> <li>• Figure 2 in DEIS Appendix D, <i>Special Status Species Plant Survey for the Palouse Wind Project</i></li> <li>• Figures 3, 4, and 5 in DEIS Appendix G, <i>Wetlands and Other Waters Delineation Report for the Palouse Project</i></li> <li>• Figure H-1, Appendix H, <i>Visual Resource Photographs</i></li> </ul> These figures show the area for the generator line. Both NWC and CH2M HILL included the generator line area in their studies. In addition, the study of avian use in the area west of US 195 is underway per the DEIS Addendum, (see	No change to the text required.

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						Addendum Figure 3.3.1); raptor nests were covered within the buffer; an additional 2011 spring flight survey will re-cover and will add 2 miles out of the transmission line corridor.	
<b>279 KAR-A-15</b>	Scope	Section 2.4, Steam Shovel Expansion Area	Karl and Associates; Pullman, WA	March 3, 2011	<p>“The DEIS was confusing in that it attempted to address the already-planned expansion on Steam Shovel Hill. However, the treatment of this area was uneven and not given a full analysis. This area did not receive the same surveys as the other areas, and the assessment of the impacts in this area was confusing. This is a good example of why the County should consider the precedent and cumulative effects of allowing this project, and then deny this project. No matter how extensive the documentation and assessments, this project is still a very bad idea.”</p>	<p>Please refer to the response to Comment 168 (HOC-9).</p> <p>In February 2011, the Palouse Wind incorporated Steam Shovel Hill (previously referred to as the Steam Shovel Expansion Area [SSEA] in the November 2010 DEIS) into its amended CUP application and the Proposed Action now includes both areas. At the time of DEIS issuance, when the CUP application was only for Naff Ridge, it was appropriate to consider the Steam Shovel Hill as part of the DEIS evaluations in accordance with WAC 197-11-060(3)(b), to avoid a “piecemeal” review, as all relevant code criteria were met. Subsequent to the November 2010 DEIS, the March 2011 DEIS Addendum and this FEIS provide further environmental analysis regarding the change in the proposed action that includes the Steam Shovel Hill area.</p> <p>The Steam Shovel Hill area received the same level of review as the remainder of the Proposed Action area. Please refer to the DEIS appendixes and their figures as well as the DEIS Addendum, which include the Steam Shovel Hill area in their assessments for special status plant species, wetlands, habitat evaluation, cultural resources, visual resources, etc.</p> <ul style="list-style-type: none"> <li>• Figures 1 through 5 in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind</i>, prepared by Northwest Wildlife Consultants, Inc (NWC)</li> <li>• Figure 2 in DEIS Appendix D, <i>Special Status Species Plant Survey for the Palouse Wind Project</i></li> <li>• Figures 3, 4, and 5 in DEIS Appendix G, <i>Wetlands and Other Waters Delineation Report for the Palouse Project</i></li> <li>• Figure H-1, Appendix H, <i>Visual Resource Photographs</i></li> </ul> <p>The figures show the Steam Shovel Hill area. Both NWC and CH2M HILL included the Steam Shovel Hill area in their studies.</p> <p>Development of a commercial wind generating facility is allowed under the Whitman County Zoning Code as a conditional use.</p>	No change to the text required.
<b>280 KAR-A-16</b>	Fire	Health and Safety/ Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	<p>“Some of these turbines will be up to 492 feet tall with rotor diameters of up to 328 feet. If you stood a Boeing 747 on its tail, it would fit within the rotor-swept perimeter. Turbines can and do catch on fire. This has happened on numerous occasions. Nacelles would be about 328 feet above the ground. Nacelles contain substantial amounts of lubricant and blades are made of treated wood. Flaming blade tips traveling at almost 200 mph might be a problem during the beginning of harvest in August (as well as at other times of the year) and the potential for this should have been better addressed, both in terms of economic and other community effects, as well as the effects of additional fires on surrounding habitats.”</p>	<p>The potential for fires during operations is addressed in DEIS Section 3.14.4.2 (Fire Protection, page 3-179). It is not the nacelle that contains lubricant, but the mechanical equipment making up the turbine is lubricated. Wind turbine fluid quantities are listed in DEIS Table 3.7-2 (page 3-92). The rotor blades are not made out of wood.</p> <p>Palouse Wind acknowledges that fire events do occur, but are very rare. Emergency preparedness and emergency access measures proposed by Palouse Wind will reduce potential impacts to surrounding property, rescue personnel, and the public in the event of an emergency. These measures are discussed further in DEIS Section 3.10.6, Health and Safety, and include preparation of a Health and Safety Plan, an Emergency Response Plan, and a Fire Mitigation Plan for both construction and operation activities.</p>	No change to the text required.

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281 KAR-A-17	Habitats	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	<p>"This project includes areas with native Palouse prairie remnants (250 acres) and is highly likely to contain 3 rare plants. The DEIS states that Palouse prairie is included within Eastside Shrub Steppe under the Washington Department of Fish and Wildlife's Wind Power Guidelines (WDFW 2009). This is not true.</p> <p>They claim it is neither Class I nor Class II habitat, but the only remaining categories would be Conservation Reserve Program lands or Eastside (interior) grasslands (e.g., degraded annual grasslands), neither of which fit this precious resource. If Palouse prairie were categorized as Eastside Shrub Steppe (as they claim in the DEIS), it would still be a Class II habitat requiring 2:1 mitigation (see WDFW 2009; page 19 mitigation chart).</p> <p>However, the WDFW Wind Power Guidelines (WDFW 2009; page 19) state above the mitigation chart 'Where a wind project will affect habitat in 'excellent' condition (based on methods acceptable to WDFW) or Species of Greatest Conservation Need [footnote provided], wind project developers should engage in additional consultation with WDFW and the permitting authority regarding suitable mitigation requirements for such habitats.' This is the category in which the remaining 0.1 percent of the original Palouse prairie is placed by WDFW.</p> <p>Palouse prairie is a WDFW Priority Habitat and deserves more mitigation than provided by other categories in the chart, except as indicated in Class I where additional consultation is required. The U.S. Fish and Wildlife Service is supportive of WDFW's approach (William Vogel pers. comm. February 17, 2011).</p> <p>Given its status, native Palouse prairie would be assigned as a Class I Habitat if the chart went into such detail. Class I Habitats require further consultation. As it now stands, the proponent claims they have no Category I or Category II habitats – even though Eastside Shrub Steppe (which is how they categorize Palouse prairie) is a Class II habitat requiring 2:1 mitigation in the chart. This is misleading."</p> <p>(Reference provided: Washington Department of Fish and Wildlife. 2009. Wind Power guidelines. Olympia, WA. 30pp. <a href="http://wdfw.wa.gov/hab/engineer/major_projects/wind_power.htm">http://wdfw.wa.gov/hab/engineer/major_projects/wind_power.htm</a>)</p>	<p>The FEIS has been revised to clarify that Palouse Prairie would be categorized as Eastside Steppe, not Eastside Shrub Steppe. Eastside Steppe is a Washington Priority Habitat (WDFW, 2008). Eastside Steppe falls into the Washington <i>Wind Power Guidelines</i> (WDFW, 2009) category Eastside (Interior) Grasslands, a Class III habitat. WDFW <i>Wind Power Guidelines</i> category for <i>Eastside (Interior) Grasslands</i> aligns with the Washington Priority Habitat and Species (PHS) List definition for the Priority Habitat <i>Eastside Steppe</i>. WDFW <i>Wind Power Guidelines</i> category for <i>Shrub-Steppe</i> aligns with the PHS List definition for <i>Shrub-Steppe</i>. The following describes these two naming systems in more detail.</p> <p><b>WDFW Priority Habitat and Species List</b> (WDFW, 2008) identifies <i>Eastside Steppe</i> and <i>Shrub-Steppe</i> as Priority Habitats. They are described as follows:</p> <p><b>Shrub Steppe:</b> A nonforested vegetation type consisting of one or more layers of perennial bunchgrasses and a conspicuous but discontinuous layer of shrubs.</p> <p><b>Eastside Steppe:</b> A nonforested vegetation type dominated by broadleaf herbaceous flora (i.e., forbs), perennial bunchgrasses, or a combination of both. Shrubs are either absent or scattered in the overstory of steppe habitat.</p> <p>WDFW does not identify Palouse Prairie specifically as a Priority Habitat in its 2008 PHS List. However, because the assemblage of vegetation types and species that characterize Palouse Prairie is also described as one component of Eastside Steppe (that is, "perennial bunchgrasses or forbs, or a combination of both"), it follows that Palouse Prairie, as one type of Eastside Steppe, is a Priority Habitat.</p> <p><b>WDFW Wind Power Guidelines</b> (WDFW, 2009) identifies and defines <i>Eastside (Interior) Grasslands</i> and <i>Shrub-Steppe</i>. The <i>Wind Power Guidelines</i> follows the descriptions given in the Washington Comprehensive Wildlife Conservation Strategy (WDFW, 2005), which are described below:</p> <p><b>Eastside (Interior) Grasslands:</b> This habitat is found primarily in Washington at mid- to low elevations and on plateaus in the Blue Mountains. This habitat is dominated by short to medium-tall grasses. Total herbaceous cover can be closed to only sparsely vegetated. In general, this habitat is an open and irregular arrangement of grass clumps rather than a continuous sod cover. These medium-tall grasslands often have scattered and diverse patches of low shrubs, but few or no medium-tall shrubs (&lt;10 percent cover of shrubs are taller than the grass layer). This habitat is called Palouse Prairie, Pacific Northwest grassland, steppe vegetation, or bunchgrass prairie in general ecological literature.</p> <p><b>Shrub Steppe:</b> This habitat is a shrub savanna or shrubland with shrub coverage of 10 to 60 percent. In an undisturbed condition, shrub cover varies between 10 and 30 percent.</p> <p>Field reconnaissance was conducted to determine the actual habitat(s) present in the Proposed Action area. The vegetative assemblage found in the field, that is, Perennial Native grasslands (Palouse Prairie), is best described by the characteristics of <i>Eastside Steppe/Eastern (Interior) Grasslands</i> as described above. Insufficient shrubs (sagebrush, etc.) are present to classify it as shrub steppe,</p>	<p>DEIS Section 3.2.1.2 paragraph 4, sentence 2 (page 3-11) will be revised as follows:</p> <p><i>Palouse Prairie habitat is a sub-habitat of Eastside Shrub Steppe-Eastside Steppe, which is a WDFW Priority Habitat (WDFW, 2008).</i></p> <p>The following reference will be added to DEIS Section 4.4:</p> <p><i>Interactive Biodiversity Information System (IBIS). 2011. Wildlife habitat types: Eastside (interior) grasslands. <a href="http://www.nwhi.org/index/habdescriptions#15">http://www.nwhi.org/index/habdescriptions#15</a>. Eastside (Interior) Grasslands. Accessed on March 16, 2011.</i></p>

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						<p>according to any of the definitions cited above.</p> <p>Therefore, the categorization is appropriate, based in the actual onsite evaluation and review of habitat category descriptions, as the WDFW <i>Wind Power Guidelines</i> category: Eastside (Interior) Grasslands. WDFW reviewed the categorization and did not identify any concerns or request any modifications to the habitat classifications presented. WDFW did state that it is a unique habitat.</p> <p>Palouse Wind will work to minimize both temporary and permanent impacts to Palouse Prairie habitat. Once the final layout is complete, Palouse Wind will be able to determine required acreages for mitigation. If Palouse Prairie will be disturbed, Palouse Wind will consult with WDFW, Whitman County, and the Palouse Prairie Foundation to develop a compensatory mitigation package that meets WDFW <i>Wind Power Guidelines</i>. Palouse Wind understands the difficulty of restoring Palouse Prairie habitat and is interested in various opportunities with a high probability of success. Please refer to Table ES-3 in the FEIS, which contains mitigation measures proposed for potential impacts to vegetation and wildlife.</p>	
282 KAR-A-18	Habitats	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	<p>“Additionally, they only categorized the 7,000 acres they would affect directly with their footprint. They should categorize the surrounding lands that would be affected by this project. See later discussion for displacement of sensitive wildlife species. Mitigation for this surrounding habitat should occur with at least a 2-to-1 ratio and perhaps much more. Where would this mitigation occur and who would hold the title?”</p>	<p>The Proposed Action would be developed on approximately 9,000 acres. However, the maximum area that would be impacted by the Proposed Action is 355 acres (see DEIS Addendum Table 3.2-2). Approximately 59 acres would be permanently impacted; the remaining 296 acres would be temporarily impacted during construction.</p> <p>The Proposed Action area and a 2-mile area surrounding the Proposed Action boundary were analyzed for sensitive biological resources including special-status species and priority habitats (WDFW, 2008 and 2010).</p> <p>Mitigation for unavoidable impacts is proposed at the ratio proscribed by the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009). Please refer to the response to Comment 281 (KAR-A-17).</p> <p>Displacement of sensitive wildlife species in response to development of the Proposed Action is expected to be minimal to discountable with implementation of proposed habitat mitigation measures (see DEIS Section 3.3.6.1). The WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) identify a range of options for mitigating habitat impacts, including restoration and acquisition of replacement habitat.</p>	No change to text required.
283 KAR-A-19	Habitats	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	<p>“The value of Conservation Reserve Program lands (CRP) was called “moderate” in the DEIS. This is misleading. CRP has strict specifications on planting mixtures of grass, forbs, and shrubs and very high standards for management. Most of Washington’s sage grouse (<i>Centrocercus urophasianus</i>) population resides in Douglas County where approximately 33 percent of the County’s agricultural land is enrolled as CRP or in similar programs. These sage grouse would not exist if it were not for the CRP and interspersed shrub steppe. Many sage grouse attend leks that are on agricultural fields and nest and rear their broods in CRP. CRP should be mitigated with at least a 1-to-1 ratio as it is defined as a Class III Habitat. Where would this mitigation occur and who would hold the title? These details are important to provide to the public in order for there to</p>	<p>The “moderate” designation of Conservation Reserve Program (CRP) land within the Proposed Action area was based on the characteristics of this habitat identified during the field surveys (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i>, NWC, 2010).</p> <p>Sage grouse may have historically been present within Whitman County; however, there is no evidence that the species’ current range includes the County or the Proposed Action area (WDFW, 2004). CRP land within the Proposed Action area lacks the shrub steppe dominance (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i>,</p>	<p>No change to text required.</p> <p>The following reference will be added to DEIS Section 4.4: <i>Schroeder, M.S. and W.M. Vander Haegen. 2006. Use of CRP Fields by Greater Sage-grouse and other Shrubsteppe associated Wildlife in Washington. Washington Department of Fish and Wildlife. Olympia, WA.</i></p>

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					be full disclosure regarding effects and compensation.”	NWC, 2010) associated with sage grouse use of CRP habitat (Schroeder and Vander Haegen, 2006).  Unavoidable impacts to CRP habitat will be mitigated per the Class III ratios specified in the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009), as described above for Eastside Interior Grasslands. Please refer to the response to Comment 281 KAR-A-17).	
<b>284 KAR-A-20</b>	Habitats	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	“Remnant ‘eyebrows’ of hills (also called scab patches) offer important refugia and habitat for some species and allow them to utilize the matrix of croplands in which the ‘eyebrows’ are interspersed. It is also important to remember that croplands and even annual grasslands support their own types of wildlife and also have potential for restoration. Significant amounts of native habitat are associated with Steptoe Butte and the wildlife using this area are likely to be negatively affected and killed by this wind farm. Therefore, the DEIS should consider the reduced value and productivity of those habitats as well.”	The remnant patches of Palouse Prairie described as “eyebrows” in the DEIS were considered for their habitat value. As described above (please refer to the response to Comment 281 [KAR-A-17]), WDFW did not identify any priority habitats within the Proposed Action area and these areas are included within the Eastside Interior Grassland habitat described in the DEIS (see DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> , NWC, 2010). Therefore, these areas will be mitigated at the ratios proscribed by the WDFW <i>Wind Power Guidelines</i> for Class III habitat (WDFW, 2009).  Croplands and annual grasslands were surveyed for wildlife use (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> , NWC, 2010). While no mitigation is required for croplands, unavoidable impacts to annual grassland (Class III) habitat will be mitigated in accordance with WDFW’s <i>Wind Power Guidelines</i> (WDFW, 2009). Restoration of croplands is done at the discretion of the private landowner. Agricultural activities are likely to continue on privately owned cropland.  Steptoe Butte is located more than 7 miles away from the Proposed Action. There will be no direct impacts to habitats, native or otherwise, at Steptoe Butte.	No change to text required.
<b>285 KAR-A-21</b>	Habitats	Vegetation	Karl and Associates; Pullman, WA	March 3, 2011	“WDFW states (letter to Whitman County December 20, 2010) that the native perennial grasslands in the study area are a unique habitat type. They believe this habitat is important to native and migratory bird and mammal species that are dependent on such grassland habitats. WDFW further states that they have expressed their concerns regarding this habitat type to First Wind as this habitat represents remnants of the once vast Palouse Prairie and that this fact alone makes these habitat areas all the more valuable to species.  WDFW is only beginning to attempt restoration of these sensitive habitats and state they are not confident in their ability to do so. Therefore, they expressed their concern that temporary impacts will represent permanent impacts on these types of sensitive native habitats. They recommend there be no impacts to native perennial grasslands (Palouse prairie).”  (Reference provided: Washington Department of Fish and Wildlife. 2010. Letter to Whitman County commenting on Palouse Wind Project. Pasco, WA. December 20, 2010. 2pp.)	Comment noted. As described above (please refer to the response to Comment 281 [KAR-A-17]), unavoidable impacts to perennial grasslands (a sub-type of Eastside Interior Grasslands), will be mitigated per the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) for the mitigation of Class III habitats. Assuming that portions of the collector line are built using the aboveground option, only 2 acres of temporary impacts are expected to perennial grasslands. Please refer to the response to and Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>286 KAR-A-22</b>	Wildlife	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	“The three main issues with regard to wildlife in the DEIS were that the surveys were woefully inadequate; negative effects to species are severely understated; and minimization and mitigation measures are almost nonexistent.”	Comment noted. Please refer to the responses to Comment 45 (KIE-11), Comment 46 (KIE-9), Comment 48 (KIE-11), and Comment 57 (KIE-20).	Please refer to the revisions based on the response to Comment 46 (KIE-9), Comment 48 (KIE-11), and Comment 57 (KIE-20).

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287 KAR-A-23	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Wildlife Surveys in general were grossly inadequate. Searching for "special status wildlife" from June 2 to June 4 of 2010 is ludicrous. The reason many species have special status is because they are rare. Sometimes these species are cryptic and hard to observe; in other cases, they are not always present at one location. Even many farmers and ranchers do not see coyotes every day – but they are present, abundant, and will use their properties. Can you imagine a farmer being denied assistance with elk damage control because a game warden came by and at that instant in time did not see any elk on the farm?"	"Rare" does not mean difficult to detect. The survey methods used are proven processes for detection of species of interest. Please refer to NWC's methodology, as detailed in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind</i> (NWC, 2010).  Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), and Comment 58 (KIE-21).	Please refer to the revisions based on the response to Comment 49 (KIE-12).
288 KAR-A-24	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The giant Palouse earthworm ( <i>Driloleirus americanus</i> ) was addressed through a 'desktop review'. Given that a relatively small portion of the project area is native prairie, it would have seemed prudent and relatively easy to analyze those portions of the native prairie with the deepest soils. The estimated amount of habitat conversion varies, but several studies have determined that the conversion of native habitats is very high: 99.9 percent of Palouse prairie habitats converted to agriculture (Noss et al. 1995, p. 91). The U.S. Fish and Wildlife Service has indicated that listing the giant Palouse earthworm as threatened or endangered may be warranted and is initiating a review of the status of the species (July 19, 2010 Federal Register; 75 FR 42059-42066)."  (Reference provided: Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered ecosystems of the United States: a preliminary assessment of loss and degradation. U.S. National Biological Service. Biological Report 28.)	Survey and probability models for the giant Palouse earthworm are only now being developed and fine-tuned, as not much is known about its ecology and likelihood of detection.  Please refer to the response to Comment 57 (KIE-20).	No change to the text required.
289 KAR-A-25	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Applying only one Anabat (bat detector) at 20 meters and one at 40 meters on the same meteorological tower is also ludicrous. The project area covers over 5,000 acres and sampling was only conducted at one point. This does not meet the minimum industry standards for bat surveys. The project proponent should survey for bats using some of the more recent technology and should do so in a more comprehensive manner. (See discussion under Bats). Bat Conservation International recently stated that data obtained from detectors in only one location for a project of this size is 'virtually useless'."	Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), and Comment 58 (KIE-21).	Please refer to the revisions based on the response to Comment 49 (KIE-12).
290 KAR-A-26	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Avian surveys did not cover the project area. In fact, they were absent from the area in which birds are likely to be most abundant and species likely to be most diverse. The survey periods reported are suspiciously discontinuous indicating selective reporting. They only observed one duck and could not even identify that one to species. Not even dabbling or diver?"	Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), Comment 58 (KIE-21), and Comment 200 (PAS-6).	Please refer to the revisions based on the response to Comment 49 (KIE-12).
291 KAR-A-27	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Raptor surveys did not cover the entire project area. Raptor surveys were particularly inadequate in the winter. The winter of 2010 was an El Niño year which led to a mild non-typical Eastern Washington winter. Surveys in 2009 were stopped after January 9, therefore not covering the entire winter period. The subject areas receive high raptor use during winters with cold temperatures. These habitats offer raptors with winter foraging opportunities. Lack of data during a typical winter will result in inaccurate and understated mortality estimates."	Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), Comment 58 (KIE-21), and Comment 200 (PAS-6).	Please refer to the revisions based on the response to Comment 49 (KIE-12).

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292 KAR-A-28	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"The project proponent should complete at least 2 years, and preferably 3 years, of temporally contiguous avian and raptor surveys before making estimates of future mortality. Even this time represents a compromise as conditions are variable from year to year and 2 to 3 years may not capture this variability. According to the State Guidelines (WDFW 2009; page 4), 2 or more years of relevant data are recommended if the risk to avian groups of concern is estimated to be high; there is limited or no relevant data regarding seasonal use of the project site (e.g., data from nearby areas of similar habitat type); and /or the project is significantly diverse in habitat and species."</p> <p>(Reference provided: Washington Department of Fish and Wildlife. 2009. Wind Power guidelines. Olympia, WA. 30pp. <a href="http://wdfw.wa.gov/hab/engineer/major_projects/wind_power.htm">http://wdfw.wa.gov/hab/engineer/major_projects/wind_power.htm</a>)</p>	Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), Comment 58 (KIE-21), and Comment 200 (PAS-6).	Please refer to the revisions based on the response to Comment 49 (KIE-12).
293 KAR-A-29	Surveys	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"It was very disturbing to see that nocturnal surveys were not conducted. The DEIS states 'Nocturnal migrants and raptors (owls) are challenging to survey in terms of mean use, thus no nocturnal surveys were conducted for the Proposed Action.'"</p>	Please refer to the response to Comment 51 (KIE-14).	Please refer to the revisions in response to Comment 51 (KIE-14).
294 KAR-A-30	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"<i>Savanna and Grasshopper sparrow</i>. Grasshopper sparrow (<i>Ammodramus savannarum</i>) and savanna sparrow (<i>Passerculus sandwichensis</i>) are ground-nesting birds and as such are subject to disturbance and displacement. At one wind project, it was documented that grasshopper sparrows had a statistically significant negative change (Erickson et al. 2007). However, they then analyzed selected portions of the data and explained away the results. "Wally Erickson, who did the study, believes the reduction is due to temporarily disturbed vegetation near the turbines. Areas have been replanted but it will take several years to reach the pre-construction conditions" (Oregon EFSC 2007). However this is a typical response by industry to documented effects.</p> <p>In fact, Miller et al. (1998) documented the sensitivity of this and other ground-nesting species to disturbances; and results of Miller et al.'s (1998) study are supported by a number of other studies indicating that some ground-nesting species are particularly sensitive to human disturbance. Leddy et al. (1999) found that there were fewer nesting birds within 100 meters to 200 meters surrounding turbines in grasslands of southwestern Minnesota."</p> <p>(References provided: Erickson, W.P., K. Kronner, and K.J. Bay. 2007. Stateline Wind Project Wildlife Monitoring Annual Report, January – December 2006. Technical report submitted to FPL Energy, the Oregon Energy Facility Siting Council, and the Stateline Technical Advisory Committee. Produced by Western EcoSystems Technology, Inc. Cheyenne, Wyoming; and Northwest Wildlife Consultants, Inc.; Pendleton, Oregon. 40 pp</p> <p>Oregon Energy Facility Siting Council. 2007. Minutes of Energy Facility Siting Council Meeting. The Dalles, Oregon; June 30, 2006 Approved by Energy Facility Siting Council February 2, 2007</p> <p>Miller, S.G., R.L. Knight, and C.K. Miller. 1998. Influence of recreational trails on breeding bird communities. Ecological</p>	<p>Comment noted. The Proposed Action would be located on approximately 9,000 acres of leased privately owned Agricultural District zoned land, nearly all of which is actively farmed and in wheat production. Approximate acres of disturbance within these 9,000 acres are shown in Table 2-2 of the DEIS Addendum (page 6). The turbines could disturb a maximum of approximately 126 acres temporarily and 4 acres permanently. The maximum total Facility disturbance area would be a maximum of approximately 296 acres temporarily and 59 acres permanently. Altogether, these acreages represent a small portion of the 9,000-acre Proposed Action area and do not take into account that low-quality cropland represents most of the disturbance.</p> <p>The DEIS authors acknowledged the potential for displacement of some grassland-nesting bird species in DEIS Section 3.3.4.2 (page 3-42) and indicated that restoration of the disturbed habitat is expected to reduce the extent of displacement as restored vegetation matures. To date, no studies have been published that show long-term displacement of grassland-nesting birds at operating wind energy facilities. Please refer to the response to Comment 281 (KAR-A-17) for further information about mitigation.</p>	No change to the text required.

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					Applications 8(1) 1998. 162-169. Leddy, K., K.F. Higgins, and D.E. Naugle. 1999. Effects of wind turbines on upland nesting birds in conservation reserve program grasslands. <i>Wilson Bulletin</i> 111:100-104)		
<b>295 KAR-A- 31</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p><i>"Raptors:</i> The EIS did not adequately address the use raptors would make of the area for foraging. For instance, they say the area is far from eagle nests. In fact, eagles use the area for foraging. The DEIS says "Palouse Wind would ensure appropriate mitigating measures" regarding migratory birds. The MBTA requires that take (including killing) be avoided. Yet this project will not avoid killing birds. They say there are no bald eagle or golden eagle nests nearby – but they are found nesting in the County and forage throughout the County. If they forage among turbines they will be at risk of being struck by turbine-blade tips traveling at up to 200 mph."</p>	<p>NWC conducted an aerial raptor nest survey on May 14, 2009 (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> [NWC, 2010]). The survey covered the Proposed Action area and a 2-mile buffer of the avian use survey plots because the Proposed Action boundary had not been identified at the time of the survey. All potential nesting areas were searched for both active and inactive nests of raptors (including eagles). Ground-based confirmation of nests, status, and outcome were conducted during the course of other wildlife surveys. During the 2009 survey, the following active nests were identified: 10 red-tailed hawk nests, 3 Swainson's hawk nests, and 2 common raven nests. No nests for bald eagles or golden eagles were documented within the survey area and no suitable nesting habitat was identified for either species.</p> <p>Please refer to the response to Comment 48 (KIE-11) and Comment 49 (KIE-12) for information about an additional raptor nest survey planned for spring 2011.</p> <p>The Proposed Action area provides very limited foraging habitat for either the bald eagle or the golden eagle as most of the site is actively farmed cropland. Bald eagles typically forage along large rivers or lakes; neither of these habitat features is located near the Proposed Action area. Golden eagles may forage in open areas, but generally in native habitats that support prey items such as rodents and rabbits. Golden eagles may also forage on livestock carcasses on pasturelands.</p> <p>No bald eagles were observed in the Proposed Action area during surveys conducted from 2008-2011. (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County Washington</i> [NWC, 2010]) and FEIS Appendix, <i>Preliminary Summary of Winter 2011 Avian Point Counts</i> [NWC, 2011]). A single golden eagle sighting occurred during these avian surveys, although no nests were observed within a 2-mile buffer of the Proposed Action boundary. Both species are considered uncommon in Whitman County (Palouse Audubon, 2011). Despite the lack of suitable nesting and limited foraging habitat, both bald and golden eagles may migrate through the site in very low numbers, but are most likely to do so at elevations above the rotor-swept area. In addition, per WCC 19.61.060.8(e) Palouse Wind will be required to remove any carcasses of livestock or big game from within the Proposed Action boundary. Therefore, the likelihood of collisions with operating turbines is very low for both the bald eagle and golden eagle.</p>	<p>Please refer to the revisions in response to Comment 48 (KIE-11) and Comment 49 (KIE-12).</p> <p>The following reference will be added to DEIS Section 4.4: <i>Palouse Audubon. 2011. Checklist of birds for Whitman County.</i> <a href="http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf">http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf</a>. Accessed on March 16, 2011.</p>

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296 KAR-A-32	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Because of the higher precipitation in the Palouse, it would be erroneous to extrapolate too heavily from other wind facilities in the Columbia Plateau Ecosystem which the DEIS attempted. How many birds will this project kill and how many nesting pairs will it take to try to make up for that mortality? Do not forget that many of our species are already declining – some at alarming rates. The DEIS did not address the population-level impacts of this mortality nor did it provide us with a reasonable estimate of mortality."	Please refer to the response to Comment 48 (KIE-11).  Due to a lack of wind energy facilities located in close proximity to the Proposed Action, the facilities used for comparison, which include facilities (such as the Hopkins Ridge and Stateline wind facilities) located in the adjacent counties, represent the best choice for comparison in the Columbia Plateau Ecoregion (CPE). Furthermore, these facilities are similar in habitat and overall landscape and may be located within the same general avian migratory pathway as the site of the Proposed Action.  Cumulative impacts to avian and bat species (including special-status species) are addressed in DEIS Section 3.3.7. The DEIS includes a discussion of predicted avian mortality based on comparisons of avian use at the Proposed Action relative to use and mortality at other operating wind energy facilities in the CPE. As described in DEIS Appendix C ( <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> [NWC, 2010]), direct comparison of overall mean use between the Proposed Action and the Stateline and Hopkins Ridge facilities shows that the Proposed Action area (5.38) had substantially lower avian mean use than either Stateline (13.1) or Hopkins Ridge (8.4). Thus, estimated fatalities would be expected to be lower than either Stateline (Erickson et al., 2004) (2.9/MW/Year) or Hopkins Ridge (Young et al., 2009) (1.2/MW/Year).	Please refer to the revisions in response to Comment 48 (KIE-11).
297 KAR-A-33	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"What about owls? – they utilize the area at night and during the day. We know great horned owls ( <i>Bubo virginianus</i> ) make extensive use of this and other parts of the Palouse prairie. Nest surveys appear to have only been conducted on one day in May. Could these surveys really have missed great horned owls in spite of the fact it was conducted during their nesting period?"	Early May is borderline for great horned owl nesting, as many have started to fledge already and surveys often miss some great horned owl nests. This is one reason why inactive nests are noted and mapped, as they could be used by great horned owls in future years. There could certainly be some risk to great horned owls, along with other non-special status raptor species.  Please refer to the response to Comment 45 (KIE-8) and Comment 48 (KIE-11).	No change to the text required.
298 KAR-A-34	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"There is no mention in the DEIS of snowy owls ( <i>Bubo scandiacus</i> ) even though they are frequent winter residents and often migrate through the project area."	Snowy owls were not mentioned as none were recorded and they have no state or federal special status. They are listed as a Code 4 bird for Whitman County and have not been documented in the county even annually (Palouse Audubon. 2011. Checklist of birds for Whitman County. <a href="http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf">http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf</a> . Accessed on March 16, 2011.)  Please refer to the response to Comment 45 (KIE-8).	No change to the text required.  The following reference will be added to DEIS Section 4.4:  <i>Palouse Audubon. 2011. Checklist of birds for Whitman County.</i> <a href="http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf">http://www.palouseaudubon.org/Checklists/WhitmanCountyBirds.pdf</a> . Accessed on March 16, 2011.
299 KAR-A-35	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Burrowing owls are only mentioned once – casually mentioning they use open habitats – but not describing the level of impact anticipated for this species. Burrowing owls are known to occur at this site and have been shown vulnerable to collisions."	The species was surveyed for using methods developed to detect such species and WDFW databases searches recorded nothing.  Please refer to the response to Comment 45 (KIE-8).	No change to the text required.
300 KAR-A-36	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The risk for short-eared owls ( <i>Asio flammeus</i> ) is described as low, even though it is likely to be high."	Please refer to the response to Comment 45 (KIE-8).	No change to the text required.

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<b>301 KAR-A-37</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS says that ferruginous hawks ( <i>Buteo regalis</i> ) are at low risk of collision – in fact, this species may be particularly susceptible to collisions. Even if the numbers killed and then observed in monitoring each year will be low, they will be killed, and perhaps in greater proportion than other species. The same is true for the short-eared owl."	The low risk attributed to ferruginous hawks was based on the fact that there were no individuals observed within the Proposed Action area during the 2008-2010 surveys and no nests identified during the 2009 aerial nest survey (DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind</i> [NWC, 2010]). Despite the fact that the species has been observed infrequently at the Hopkins Ridge wind energy facility, no ferruginous hawk fatalities have been reported at that facility (Young, et al., 2007 and 2009).	No change to the text required.
<b>302 KAR-A-38</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"In fact, golden eagles were not even listed in the DEIS summary – another example of downplaying the effects."	Please refer to the response to Comment 49 (KIE-12) and Comment 58 (KIE-21). Golden eagles were addressed in DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment for Palouse Wind, Whitman County, Washington</i> (NWC, 2010).  Please refer to the response to Comment 49 (KIE-12) and Comment 402 (PAS-A-6).	No change to the text required.
<b>303 KAR-A-39</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Prie [sic] Grouse: Sharp-tailed grouse ( <i>Tympanuchus phasianellus</i> ) and sage grouse rely on native prairie and shrub-steppe habitats. Palouse prairie is among the most imperilled [sic] ecosystem in the United States. WDFW strongly encourages its preservation. Whitman County with its higher rainfall and deeper soils is being considered for the creation of reserves for sharp-tailed grouse and sage grouse by WDFW (Palouse Audubon 2010). Both of these species are considered either State threatened or endangered. Considerable expense has been expended to preserve these species in Washington State. Current occupied habitats are unlikely to sustain these species and the reintroduction into Whitman County holds great promise. The degradation of any native prairie will contribute to the failure of the programs. Sharptails were native to the Palouse and extirpated by early settlers. However, they are part of our heritage and should be preserved for our future."	Please see the WDFW's <i>Draft Sharp-tailed Grouse Recovery Plan</i> , available online at: <a href="http://wdfw.wa.gov/publications/00882/wdfw00882.pdf">http://wdfw.wa.gov/publications/00882/wdfw00882.pdf</a>  Figure 2 of the <i>Draft Sharp-tailed Grouse Recovery Plan</i> shows historic and current range for sharp-tailed grouse. The Proposed Action area is in the historic range. Currently, WDFW has not planned reintroduction in Whitman County.  The WDFW's 2004 <i>Greater Sage-grouse Recovery Plan</i> mentions that 70,000 acres of important riparian and shrub-steppe habitat in six counties (including Whitman was acquired; however, no map is included showing these units. In an e-mail dated January 14, 2011, WDFW indicated that there are no sage-grouse recovery units or management units in Whitman County (Divens, pers. comm. 2011a). WDFW personnel indicated during an earlier telephone conversation that they were unaware of any plans by WDFW to acquire habitat for the creation of a reserve for the sage-grouse (Divens, pers. comm. 2011b).  Please refer to the response to Comment 201 (PAS-7).  Divens, K. 2011a. Personal communication between Karin Divens/WDFW and Bridget Canty/CH2M HILL regarding the existence of or plans to preserve habitat for sharp-tailed grouse and sage-grouse in Whitman County, Washington. E-mail. January 14.  Divens, K. 2011b. Personal communication between Karin Divens/WDFW and Bridget Canty/CH2M HILL regarding the existence of or plans to preserve habitat for sharp-tailed grouse and sage-grouse in Whitman County, Washington. Telephone call. January 6.  Stinson, D.W., D.W. Hayes, and M. Schroeder. 2004. <i>Greater Sage-grouse Recovery Plan</i> . Washington Department of Fish and Wildlife. May.	No change to the text required.
<b>304 KAR-A-40</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Birds in general: Both Steptoe and Kamiak Buttes serve as major land masses during migration. The mortality of avian species is expected to be high in proximity to Steptoe Butte."	Please refer to the response to Comment 200 (PAS-6).	No change to the text required.

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305 KAR-A-41	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"More than 200 different kinds of birds and 12 species of bats have been recorded in this area. These species are also likely to fly across the project area. How will the mortality of these species affect the goals and objectives of the Refuge?"	Turnbull National Wildlife Refuge was created to preserve high quality habitat. The Proposed Action area does not have the same type of habitat, nor the same attractiveness for a number of species that use the refuge. Avian use surveys in the Proposed Action area documented low use by waterfowl and waterbirds, which would be expected to frequent the refuge. Development of the Proposed Action is not expected to affect wildlife use at the refuge, which is located approximately 18 miles from the Proposed Action area.	No change to the text required.
306 KAR-A-42	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The area is also used by trumpeter swans ( <i>Cygnus buccinator</i> ) which are particularly vulnerable to collisions and electrocutions at high power transmission lines. High-power transmission lines are generally built with sufficient space to avoid electrocuting most birds; but swans are different. They have large body mass and extensive wing spans. Their bodies are heavy enough that if they strike a line they can sway it closer to the other lines. Also, they fly close together, essentially wing-tip to wing-tip, and often will cause a line to arc across multiple individuals resulting in death of several birds at once. This risk was also not discussed in the DEIS. White pelicans ( <i>Pelecanus erythrorhynchos</i> ) are also large birds that can fly in tight formation, and are found at Turnbull Refuge."	Please refer to the responses to Comment 45 (KIE-8) and Comment 305 (KAR-A-41). The habitat features that are attractive to these species (large bodies of water/wetlands) are not present in the Proposed Action area. It is recognized that these birds may migrate through the area, but the potential for impacts is very low.	No change to the text required.
307 KAR-A-43	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"What about nocturnal migrants, do they fly through the area at night? We do not know. Why do we not know? -- because the project proponent conducted absolutely no nocturnal surveys for birds. How was this oversight allowed? No Nocturnal Surveys??"	Please refer to the response to Comment 51 (KIE-14).	Please refer to the revisions in response to Comment 51 (KIE-14).
308 KAR-A-44	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"Bats: As mentioned earlier, the surveys were only conducted for 1 year and used only one valid detector which renders the completed surveys essentially useless with respect to bats. This approach may have missed over 99 percent of the potential bat detections, and perhaps much more....</p> <p>Over 90 percent of bat mortalities currently recorded at wind-energy developments involve migratory species (Lausen et al. 2006). Depending on the location, hoary bats (<i>Lasiurus cinereus</i>), eastern red bats (<i>Lasiurus borealis</i>), and silver-haired bats (<i>Lasionycteris noctivagans</i>) dominate mortalities...</p> <p>Because bat migration is poorly understood, all proposed wind-energy development locations should be monitored for bats using a pre-construction survey. Wind-energy developments should not be located within a mile of known bat hibernacula. The goal of pre-construction surveys is to achieve a representative sampling of bat activity across the proposed location of a wind-energy development. This will facilitate estimates of the relative risk to bats from wind turbines at proposed sites and allow for better siting. Specifically, the surveys should be designed to determine:</p> <ol style="list-style-type: none"> <li>1. Species occurrence and diversity;</li> <li>2. Activity levels (e.g., relative abundance, seasonal timing, daily timing); and</li> <li>3. Potential migration routes.</li> </ol> <p>Because the number and distribution of detectors in the First Wind surveys were so inadequate, we also have no confidence</p>	<p>Please refer to the response to Comment 56 (KIE-19, and Comment 295 (KAR-A-25).</p> <p>Assessment of bat activity at proposed wind farms varies across the country, from collection of no data to collection of use data with one to several monitoring stations. This is due to a number of factors, including variability among types of detectors, variability in habitat availability, the lack of any one standard protocol, and difficulty in tying use data from detectors directly to fatality quantities.</p> <p>Palouse Wind chose to collect bat acoustic data from a representative location during the annual time period when bats appear to be more susceptible to collisions with wind turbines. The location chosen was in a wheat field and was representative of the vast majority of the Proposed Action area and where wind turbines would be located. These surveys were not required per the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009), but Palouse Wind felt it prudent to collect some bat use data during this time period to verify that species occurrence and composition is generally as would be expected given the Proposed Action's regional location and available habitats.</p> <p>The survey data were not anticipated to be the only data source used to assess potential impacts of the Proposed Action on bats. Rather, fatality survey results from comparable wind development projects provide greater insight into the likely impacts in the Proposed Action area. A large number of wind projects in Washington and Oregon have been intensively studied to measure impacts to bats. These projects</p>	Please refer to the revisions in response to Comment 56 (KIE-19) and Comment 295 (KAR-A-25).

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					<p>that the other aspects of detector deployment were correct. For instance, we question the orientation, wiring, and sensitivity adjustment. Sensitivity of the AnaBat detectors can be adjusted, and it is recommended that a level of 8 be used unless this generates too many extraneous “noise” files, if so, sensitivity can be lowered, but this compromises detection range. All AnaBat detectors in the survey area should be set at the same sensitivity setting, and this sensitivity should be provided with data submission. Sensitivity settings were not provided in the DEIS. Because AnaBat sensitivity decreases as battery power decreases, the battery should be monitored and recharged as necessary. Again, we have no confidence this care was taken since they did not deploy the required number of detectors for a valid sample.</p> <p>There was no mention of post-construction monitoring for bats. While we continue to recommend denial of the Conditional Use Permit, any wind farm permitted should provide the following post-construction monitoring for bats. Continue bat surveys using radar and AnaBat technology. These surveys will help correlate mortality monitoring with bat activity. Conduct annual surveys during fall migration. Continue monitoring of hibernacula and roosts sites to detect any changes in use of these areas.</p> <p>These findings are very relevant to this project as Palouse wind only deployed one detector at sufficient height to make such samples. It is easily possible that such a detector, even if operating properly, could only detect a fraction of a percent of the detections that would be detected by a sufficient array.”</p>	<p>are particularly relevant because they occur in essentially identical habitats as the Proposed Action, occur within the same region and would have comparable resident and migratory bat populations, and consist of similar modern wind turbines.</p> <p>Together, the data collected in the Proposed Action area and the available fatality data from nearby projects provides a strong foundation on which to assess risk at the Proposed Action site. Most importantly, there appears to be no indication that the Proposed Action would represent a greater risk to bats than other projects in the Northwest in similar habitats. Consequently, fatality surveys from other nearby projects provide reliable data on which to assess the likely impact of this project on bats. The DEIS provides a thorough review of the reported fatality data from those projects and provides the biological and ecological rationale as to why impacts at the Proposed Action would be relatively low and similar to that found at other similar projects in the region.</p> <p>In addition, while bat migration may be “poorly understood,” bat fatalities at wind projects are very well understood in terms of same trends occurring through the U.S. and Canada.</p>	
309 KAR-A-45	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>“It is good that meteorological towers will not be guyed. Avian mortality is a concern at any towers or tall structures (Manville 2000). The construct [sic] of these towers as well as lighting of them and wind turbine towers should conform to the recommendations of Manville (2001a, 2001b, 2005, and 2007) as well as more recent guidance. Synchronized red strobes with short ‘on’ pulses are best. Lighting of the turbines is required to comply with FAA regulations at a minimum; however, we also suggest that all lights illuminate synchronously and use the minimum number of strobed, strobe-like or blinking red incandescent lights with the minimum intensity, dual strobe lights. No steady burning lights should be used on the turbines (or facilities). All lights should be focused downward to reduce skyward illumination and equip lights with motion detectors to avoid continuous illumination (Manville 2001a, 2001b, 2005, 2007; Gehring et al. 2009).”</p> <p>(References provided: Gehring, J., P. Kerlinger, and A.M. Manville II. 2009. Communication towers, lights, and birds: successful methods of reducing the frequency of avian collisions. <i>Ecological Applications</i> 19:505–514. [doi:10.1890/07-1708.1]: <a href="http://www.esajournals.org/doi/full/10.1890/07-1708.1">http://www.esajournals.org/doi/full/10.1890/07-1708.1</a></p> <p>Manville II, A.M., 2000. Avian mortality at communication towers: background and overview. In: W. R. Evans and A. M. Manville, II, eds. <i>Proceedings of the workshop on avian mortality at communication towers</i>; 1-5. <a href="http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm">http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm</a></p> <p>Manville II, A.M., 2001a. The ABCs of avoiding bird collisions at</p>	<p>Comment noted. Please refer to the response to Comment 116 (FAAM-1). All Facility lighting will adhere to current Federal Aviation Administration (FAA) guidelines for lighting (FAA, 2007). Furthermore, a recent study chronicled in <i>The Wilson Journal of Ornithology</i> indicates that towers lit with flashing red lights, as recommended by the FAA, have significantly fewer avian fatalities than towers lit with a combination of steady-burning and flashing lights (Kerlinger et al, 2010).</p> <p>Federal Aviation Administration. 2007. <i>Advisory Circular: Obstruction Marking and Lighting</i>. <a href="http://rgl.faa.gov/Regulatory_and_Guidance_Library/rqAdvisoryCircular.nsf/0/b993dcdcf37fcdc486257251005c4e21">http://rgl.faa.gov/Regulatory_and_Guidance_Library/rqAdvisoryCircular.nsf/0/b993dcdcf37fcdc486257251005c4e21</a>. Accessed March 24, 2011.</p> <p>Kerlinger, P. et al. 2010. <i>Night Migrant Fatalities and Obstruction Lighting at Wind Turbines in North America</i>. <i>The Wilson Journal of Ornithology</i>. 122(4): 744-754.</p>	No change to the text required.

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					<p>communication towers: next steps. In: R. L. Carlton, editor. Avian interactions with utility and communication structures. Proceedings of a workshop held in Charleston, South Carolina, December 2-3, 1999. Concord, CA: EPRI Technical Report; 85-103.</p> <p>Manville II., A.M. 2001b. Avian mortality at communication towers: steps to alleviate a growing problem. Pages 75–86. In: Levitt, B. B., editor. Cell towers: Wireless convenience? or environmental hazard? Proceedings of the Cell Towers Forum: state of the science/state of the law. 2 December 2000, Litchfield, Connecticut USA; Markham, Ontario, Canada. New Century Publishing, 2000.</p> <p>Manville II., A.M. 2005. Bird strikes and electrocutions at power lines, communication towers, and wind turbines: state of the art and state of the science—next steps toward mitigation. Pages. 1051–1064. In: Ralph, C. John; Rich, Terrell D., editors 2005. Bird Conservation Implementation and Integration in the Americas: Proceedings of the Third International Partners in Flight Conference. 2002 March 20-24; Asilomar, California, Volume 2: Gen. Tech. Rep. PSW-GTR-191. Albany, CA: U.S. Dept. of Agriculture, Forest Service, Pacific Southwest Research Station.</p> <p>Manville II., A.M. 2007. Comments of the U.S. Fish and Wildlife Service submitted electronically to the FCC and 47 CFR Parts 1 and 17. WT Docket Number 03-187, FCC 06-164. Notice of Proposed Rulemaking, “Effects of Communication Towers on Migratory Birds.”)</p>		
<b>310 KAR-A-46</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	“We also recommend that the project utilize minimum intensity, maximum “off-phased” dual strobes.”	Comment noted. Please refer to the responses to Comment 116 (FAAM-1) and Comment 309 (KAR-A-45).	No change to the text required.
<b>311 KAR-A-47</b>	Negative Effects to Species	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>“There was also no mention of cut-in speed. Low wind periods are associated with increased bat activity (Arnett et al. 2010a) and curtailment of turbines during low wind periods (cut-in-speeds) has been shown to be effective in reducing the number of bat mortalities.</p> <p>Without such provisions for cut-in-speeds and/or curtailment it is difficult to imagine that the Company is taking “all reasonable measures” to avoid and minimize the illegal killing of migratory birds. Cut-in-speeds should be set at no less than 10 mph to protect bats adequately.”</p> <p>(References provided: Arnett, E.B., M. Schirmacher, M.M.P. Huso, and J.P. Hayes. 2010a. Effectiveness of changing wind turbine cut-in speed to reduce bat fatalities at wind facilities. Final Report. Annual report prepared for the Bats and Wind Energy Cooperative and the Pennsylvania Game Commission.</p>	There is some evidence that implementation of these strategies may be effective at reducing wildlife collisions with wind turbines (Arnett, et al., 2009). Changes in cut-in speeds and curtailment are mitigation measures that are used when adverse operational impacts to special status wildlife species have a high probability of occurrence. The Proposed Action is not expected to have significant operational impacts to any special status species; however, similar measures would be considered in consultation with applicable regulatory agencies if the Proposed Action demonstrates actual mortality rates are significantly higher than expected levels.	<p>No change to the text required.</p> <p>The following reference will be added to DEIS Section 4.4:  <u>Arnett, E.B, M. Schirmacher, M.M.P. Huso, and J.P. Hayes. 2009. Effectiveness of Changing Wind Turbine Cut-in Speed to Reduce Bat Fatalities at Wind Facilities. Annual Report. Prepared for the Bats and Wind Energy Cooperative and the Pennsylvania Game Commission. April.</u></p>
<b>313 KAR-A-48</b>	Negative Effects to Species		Karl and Associates; Pullman, WA	March 3, 2011	“On page 116, they talk about turbine siting. That’s not the issue; the issue is facility siting. The only way to correct improper siting of a facility is to not build it.”	Comment noted.	No change to the text required.
<b>314 KAR-A-49</b>	Negative Effects to Species	General	Karl and Associates; Pullman, WA	March 3, 2011	“The WDFW Wind Power Guidelines (2009; page 6) recommend a Technical Advisory Committee (TAC) be established to function as a post-construction advisory committee to the project owner and the permitting authority. The TAC is responsible for reviewing results of post-construction monitoring data and making suggestions regarding	Palouse Wind will establish a TAC for this project. Regulatory agencies will have access to the operational monitoring data. Palouse Wind will continue coordination with these agencies to ensure that appropriate measures are implemented in response to the actual impacts of the Proposed Action.	Please refer to the revisions based on the response to Comment 59 (KIE-22)

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					the need to adjust mitigation and monitoring requirements based on results of monitoring data and other relevant data. Potential members include stakeholders from environmental groups, wind-project owners and / or developers of the project, landowners, and county representatives, tribes, state and federal resource agencies (WDFW 2009). The range of potential adjustments to the monitoring and mitigation requirements should be clearly stated in the project permit. Adjustments should be made if unanticipated impacts become apparent from the monitoring data. Such changes may include but are not limited to the following examples: reducing or eliminating the source of the impact, management plans, additional monitoring or research focused on understanding the identified impacts to particular species, and creation of raptor nesting structures. TACs should review and comment on the protocols for conducting the monitoring study, and the procedures and form for reporting the information (WDFW 2009)."	Please refer to the response to Comment 59 (KIE-22)	
<b>315 KAR-A-50</b>	Negative Effects to Species	Description of Proposed Action	Karl and Associates; Pullman, WA	March 3, 2011	"There was no discussion of the mitigation acres required, nor where they would be or how they would be managed. They did not discuss compacting soils near turbine pads to reduce rodent populations and thereby reducing the attractive nuisance of raptor prey. There was no mention of burying the interconnecting lines between turbines."	Comment noted. Please refer to the responses to Comments 281 (KAR-A-17) and 282 (KAR-A-18) regarding mitigation acres.  As shown on DEIS Figure 2-4, there will be a gravel apron with a diameter of approximately 60 feet that will serve to reduce rodent populations in areas surrounding the turbines.  DEIS Section 2.5.4 (page 2-17) states that the majority of the collector system will be installed underground. DEIS Addendum Section 2.3.1.5 (page 5) notes that any aboveground collector line will be designed in accordance with the recommendations of the Avian Power Line Interaction Committee (APLIC) in order to reduce the impacts of power lines on birds.	Please refer to the revisions based on the response to Comment 281 (KAR-A-17).
<b>316 KAR-A-51</b>	Negative Effects to Species	General	Karl and Associates; Pullman, WA	March 3, 2011	"Overall, this project proposal lacks reasonable avoidance and minimization measures, therefore would be implemented in wanton disregard for the consequences. It does not describe the required mitigation and how it would be implemented. In fact, it misleads the reader into believing there would not be any mitigation required."	Please refer to the mitigation measures provided in Table ES-3, Summary of Impacts and Proposed Mitigation Measures for the Palouse Wind Project.  Please refer to the responses to Comments 281 (KAR-A-17) and 282 (KAR-A-18) regarding mitigation acres.	Please refer to the revisions based on the response to Comment 281 (KAR-A-17).
<b>317 KAR-A-52</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"Contrary to the DEIS claims, disturbance to birds is not limited to construction and is not temporary (per page 103). There is ample science demonstrating long-term displacement of sage grouse, prairie chickens, grasshopper sparrows, and other species."	Please refer to the responses to Comment 201 (PAS-7), Comment 283 (KAR-A-19), Comment 294 (KAR-A-30), and Comment 299 (KAR-A-35).  The Proposed Action area does not provide habitat for sage grouse or prairie chickens; therefore, these species would not be displaced by development of the Proposed Action.	Please refer to the revisions in response to Comment 283 (KAR-A-19).
<b>318 KAR-A-53</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS makes exaggerated claims. It downplays the effects of converting CRP and cropland. On page 104 it says the project would be unlikely to have adverse impacts to bats – it will kill them. Yes, bat biology and behavior are poorly understood. But the fact that First Wind's surveys were almost nonexistent is not going to help any in understanding the impacts of this project."	Please refer to the response to Comment 56 (KIE-19), Comment 58 (KIE-21), and Comment 306 (KAR-A-42).  The DEIS acknowledges that there will be bat mortality as a result of development of the Proposed Action. No bat hibernacula or roosts were identified in the Proposed Action area (DEIS page 3-35) and the Proposed Action area contains limited foraging habitat (such as riparian habitat); therefore, impacts from habitat conversion during construction of the Facility are likely to be very low to discountable. No riparian habitat would be impacted by the Proposed Action. The level of mortality from collision with operating wind turbines is	Please refer to the revisions in response to Comment 56 (KIE-19).

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						predicted to be low (DEIS page 3-36) and similar to that recorded at operating wind energy facilities in the Columbia Plateau Ecoregion.	
<b>319 KAR-A-54</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"They note that tree-roosting bats comprise the majority of those killed. They fail to mention that tree-roosting bats (e.g., Hoary bats) have also been killed in great numbers at prairie facilities."	Please refer to the responses to Comment 306 (KAR-A-42) and Comment 316 (KAR-A-51).  As noted in Appendix E to the DEIS ( <i>Avian, Bat and Habitat Cumulative Impacts Associated with Wind Energy Development in the Columbia Plateau Ecoregion of Eastern Washington and Oregon</i> , WEST, Inc., 2010), only 3.3 percent of the bat use recorded during the surveys was attributed to hoary bats, representing low use by this vulnerable tree-roosting species. Overall bat mortality at the Proposed Action is expected to be within the lower part of the range of mortality reported at operational wind energy facilities in the Northwest (WEST, 2010).	No change to the text required.
<b>320 KAR-A-55</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS greatly downplayed the effects this project will have on raptors. They say that once a construction timeline is finalized, effects will be further analyzed. That is too late."	The DEIS includes a detailed analysis of potential effects to raptors including those that may result from construction and operation of the Proposed Action (see DEIS Sections 3.3.4.1 and 3.3.4.2). The DEIS also includes predictions of raptor mortality based on the results of the avian use surveys relative to pre- and post-construction data available for operating wind energy facilities in the Columbia Plateau Ecoregion. Few nesting raptors were documented within the Proposed Action area during the aerial raptor nest survey. If nesting raptors are identified proximate to the Proposed Action during the 2011 aerial nest survey, species- and lifecycle-appropriate construction buffers can be established to minimize disturbance.	No change to text required
<b>321 KAR-A-56</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The public is supposed to get a chance to comment on the anticipated effects and the County should be considering these effects. The 'further analysis' will also be too late because the decision will have been made. Then we will find out the effects will be greater than anticipated."	The public was offered multiple opportunities to comment on the EIS. Public comment was solicited during the scoping period (August 26, 2010 to September 16, 2010), and after the submittal of the DEIS (November 18, 2010 to December 20, 2010) and the DEIS Addendum (March 3, 2011 to March 14, 2011).  Please refer to the response to Comment 320 (KAR-A-55)	No change to text required
<b>322 KAR-A-57</b>	Understated Wildlife Effects	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"When past studies have shown effects to wildlife, wind companies have just explained it away – and this DEIS repeats those 'explanations'."	Comment noted. The analyses presented in the EIS reflect best available science as applied to this specific type of industry.	No change to the text required.
<b>323 KAR-A-58</b>	Post-Construction Monitoring	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The suggestion that post-construction monitoring of mortality should only last 1 year is just another way (among many) that the project proponent intends to cover up the real mortality levels. If they were serious about monitoring for potential problems, they would monitor for the life of the project."	Whitman County Code (WCC) 19.61.060(8)(f) requires that the applicant monitor the project for a minimum of 1 year following project start-up to estimate bird and bat fatalities using standard protocol. The monitoring data will be provided to the Technical Advisory Committee (TAC) (please refer to the response to Comment 59 [KIE-22]), and to Washington Department of Fish and Wildlife (WDFW) and U.S. Fish and Wildlife Service (USFWS) for review and comment. Based on the actual mortality results identified, the TAC and the agencies will be able to provide recommendations to Whitman County regarding whether additional monitoring is warranted.	No change to the text required.

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<b>324 KAR-A-59</b>	Post-Construction Monitoring	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"They say they will report observed mortalities to U.S. Fish and Wildlife Service on a quarterly basis. This is for the time periods that they will not be conducting monitoring. Therefore, they would only be reporting the birds they trip over but do not actively look for.</p> <p>The DEIS says they will follow this requirement unless the U.S. Fish and Wildlife Service waive the requirement. However, there is no such requirement by U.S. Fish and Wildlife Service. This is again an attempt by the project proponent to confuse the public into believing they are well intentioned and are actually working with the agencies."</p>	<p>WCC 19.61.060(8)(f) also requires that "the applicant shall report bird fatalities observed for the life of the project to WDFW and USFWS on a quarterly basis, unless and until these wildlife agencies waive or reduce this reporting requirement." Palouse Wind will comply with this requirement.</p> <p>Please refer to the response to Comment 270 (KAR-A-6).</p>	No change to the text required.
<b>325 KAR-A-60</b>	Post-Construction Monitoring	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"The U.S. Fish and Wildlife Service has not been discussing reporting requirements or any other aspects of this project with Palouse Wind as of February 17, 2011, (William Vogel pers. comm. February 17, 2011)."</p>	<p>Comment noted. Please refer to the response to Comment 270 (KAR-A-6) and Comment 324 (KAR-A-59).</p>	No change to the text required.
<b>326 KAR-A-61</b>	Post-Construction Monitoring	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	<p>"U.S. Fish and Wildlife Service does not generally forward cases for prosecution by the Department of Justice regarding migratory birds if project proponents are applying all reasonable measures to avoid and minimize such killing. These reasonable measures are generally addressed through an Avian and Bat Protection Plan and an Eagle Conservation Plan. Palouse Wind has completed neither of these documents. How does this affect the liability the County will be accepting by approving this project?"</p>	<p>Palouse Wind will continue to coordinate with U.S. Fish and Wildlife Service (USFWS) to ensure reasonable measures are being considered in the implementation and operation of this Proposed Action with respect to impacts to migratory birds.</p> <p>In consultation with USFWS, Palouse Wind will determine if development of an Avian and Bat Protection plan is an appropriate measure in consideration of the site-specific aspects of the Proposed Action.</p> <p>In February 2011, USFWS issued draft Eagle Conservation Plan Guidance; the guidance anticipates that "project proponents determine which of the following categories the project, as planned, falls into: (1) high risk to eagles, little opportunity to minimize effects; (2) high to moderate risk to eagles, but with an opportunity to minimize effects; (3) minimal risk to eagles; or (4) uncertain." As noted elsewhere, the guidance is still in draft form and is not yet implemented. Nevertheless, Palouse Wind will work with USFWS to ascertain the appropriate categorization of the Proposed Action in the spirit of the guidance, whether development of an Eagle Conservation Plan may be appropriate for the Proposed Action, and if appropriate, the contents of such a plan.</p> <p>Please refer to the response to Comment 336 (KAR-A-71) regarding the question of County liability on this issue.</p>	No change to the text required.
<b>327 KAR-A-62</b>	Land Use	Recreation	Karl and Associates; Pullman, WA	March 3, 2011	<p>"The curtailment of hunting on adjacent properties will be interesting. What if adjoining landowners do not oblige? Will they be threatened or coerced into complying? What are the economic benefits derived in the County from hunters each fall?</p> <p>Why should we believe the Company would only seek such restrictions during the "hunting season" when some shooting such as coyotes is allowed year round? Why should we believe they would only seek these restrictions during construction and not throughout the life of the project?"</p>	<p>As stated in DEIS Section 3.12.2.1, Hunting (page 3-147), the closest publicly accessible hunting location is approximately 7 miles southwest of the Proposed Action area. There are no Washington Department of Fish and Wildlife (WDFW)-designated public-access hunting locations within the Proposed Action area; all landowners located within the area privately manage access and hunting on their own lands.</p> <p>Palouse Wind will work with landowners participating in the Proposed Action to ensure that hunting activities within the Proposed Action area are conducted in a manner protective of facilities, staff, and the hunters themselves (see DEIS, 3.12.4.2, page 3-148).</p> <p>Palouse Wind does not have control over activities on property that has not been leased for purposes of constructing Proposed Action facilities. Landowners of such adjoining</p>	No change to the text required.

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						properties will continue to privately manage access to, and hunting on, their properties.	
<b>328 KAR-A-63</b>	Landscapes	Visual	Karl and Associates; Pullman, WA	March 3, 2011	"Portions of the DEIS dealing with impacts and assessments of view sheds did not account at all for photographers. Steptoe Butte is an area with extreme sensitivity. The Palouse Scenic Byway surrounds the project and the project will have a great impact on the utility of this designation. This project will degrade the landscape setting and the character of the surrounding areas and communities. The locations they chose to analyze for this assessment were biased."	Chapter 47.39 of the Revised Code of Washington (RCW) codifies the Scenic and Recreational Highway Act of 1967. Subsection (2) of Section 47.39.069 (Designation and Removal Criteria). The subsection states that the criteria developed in Section 47.39.069 "must not impose nor require regulation of privately owned lands or property rights..."  The Palouse Scenic Byway Corridor Plan (Plan) was published in 2006. The Plan does not direct or restrict adjacent land use other than highway related upgrades and repairs.	Please refer to the changes based on the response to Comment 246 (VOG-3).
<b>329 KAR-A-64</b>	Landscapes	Visual	Karl and Associates; Pullman, WA	March 3, 2011	"We disagree with their claim that tourist [sic] would not notice the change as viewed from Steptoe Butte – how could they not notice? Tourists come to Steptoe Butte to see the agrarian landscapes depicted in so many pictures they have seen. How could you not notice 63 structures as big as Boeing 747's (almost 500 feet high) and spinning at almost 200 mph – with blinking red lights. Please pause and consider that assertion. Would tourists also not notice if a smelter with a 500-foot smoke stack were placed on top of Steptoe Butte?  Are we also to believe they would not notice high-voltage transmission lines which will also be an integral part of this project?"	The FEIS authors acknowledge that many turbines could be seen from this location (DEIS pages 3-104 and 3-110), we maintain that due to viewing distance (4.5 to 10.0 miles from this location), atmospheric conditions, and visual complexity of the seen landscape (strong geometric shapes of fields) impacts to most viewers would be low (DEIS page 3-116). See Figure 9b in the DEIS Addendum for a simulation of the 65-turbine layout as seen from Steptoe Butte.  The approximately 4-mile-long aboveground 34.5- or 230-kilovolt (KV) generator line that would be used to transmit the electrical current to the interconnection substation would be similar in scale and appearance to existing transmission lines in the Proposed Action area. Its visual impact to most viewers from Steptoe Butte (if they could see it at all) would likely be low.	No change to the text required.
<b>330 KAR-A-65</b>	Landscapes	Socioeconomics	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS section on land use also did not address photographic tours and neither did any of the economic analyses. Numerous companies and individuals offer photographic tours of the Palouse Region. People come from all over the United States, Europe, and other parts of the world such as Australia to view and photograph our unique landscape."	Please refer to the response to Comment 246 (VOG-3).	Please refer to the changes based on the response to Comment 246 (VOG-3).
<b>331 KAR-A-66</b>	Landscapes	Socioeconomics	Karl and Associates; Pullman, WA	March 3, 2011	"They eat in restaurants, stay in motels, and shop in our stores. On an annual basis, they expend over a million dollars in meals and lodging alone. But there was no mention of this in the DEIS. These people come to photograph the Palouse, including covered bridges, old barns, and beautiful sunsets across the wheat fields, and, primarily, our pristine rolling landscapes -- with no wind turbines. The Steptoe Butte area is a key destination for almost all such tours. Placing 63 wind turbines north of Steptoe Butte would be a devastating blow to this industry as well as to the local residents and tourists alike."	Please refer to the response to Comment 246 (VOG-3).	Please refer to the changes based on the response to Comment 246 (VOG-3).
<b>332 KAR-A-67</b>	Economics	Socioeconomics	Karl and Associates; Pullman, WA	March 3, 2011	"The DEIS claims there will be economic benefits from construction workers staying in our communities. No. They will be staying in Spokane where there is a larger selection of restaurants and nightlife – they are construction workers."	Comment noted. It is anticipated that construction workers will select the place they stay based on their day-to-day needs and their readiness to commute. It is anticipated that some will chose locations within adjacent communities, including those in Whitman County.  Please refer to the response to Comment 357 (VOG-A-4).	No change to the text required.

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<b>333 KAR-A-68</b>	Economics	Socioeconomics	Karl and Associates; Pullman, WA	March 3, 2011	"On page 208, the DEIS claims that the project will increase tourism – another extremely inaccurate statement. It will in fact have a severe impact on a major economy in the county (i.e., photographic tours)."	Comment noted. Please refer to the response to Comment 246 (VOG-3).	Please refer to the changes based on the response to Comment 246 (VOG-3).
<b>334 KAR-A-69</b>	Economics	Socioeconomics	Karl and Associates; Pullman, WA	March 3, 2011	"We also find it hard to believe that agriculture, forestry, and fishing all together, along with all the associated jobs, make up less than 2 percent of the employment in Whitman County."	The reference (Washington State Employment Security Department [WSESD]) was re-checked and the data is correct. Farm employment alone is about 1 percent of the entire employment in Whitman County.	No change to the text required.
<b>335 KAR-A-70</b>	Energy Issues	General	Karl and Associates; Pullman, WA	March 3, 2011	<p>"On page 104 and 105 of the DEIS, we are provided with rhetoric on climate change and supposed benefits of wind power. Much of this discussion is simply not true or is taken out of context. Placement of this Wind Farm will not reverse the effects of greenhouse gases nor reverse global climate change. Because the wind does not blow all the time, and power must be used and generated concurrently, there will still need to be coal-fired plants up and running to make up the difference. This is a requirement of a fickle energy source such as wind. Nevertheless, power companies will be required to purchase wind, the project proponent will get big tax credits, and they may even get cash payments. If it were not for these requirements to purchase this power and the incentives provided to project proponents at the expense of taxpayers, project proponents could not sell their energy at competitive prices. In fact, last year Bonneville Power Administration had to pay people to use power during peak wind-generation periods and could not reach the vast majority of wind projects to request curtailment.</p> <p>Quoting from the Administrative Draft Record of Decision on Environmental Redispatch and Negative Pricing Policy (February 18, 2011), 'In June 2010, the BPA Balancing Authority Area faced a temporary oversupply of generation due to surging spring runoff on the FCRPS and high winds. The generation levels in the BPA Balancing Authority Area exceeded its load and export commitments. Excess generation in relation to loads and exports creates high frequency, which, if unmitigated, could negatively impact power system reliability. These conditions also led to a lack of demand for federal hydropower even at zero cost and threatened to create water conditions in the Columbia River dangerous to fish and in violation of BPA's CWA and ESA obligations.'"</p>	<p>Pages that are referenced (pages 104 and 105) of the DEIS do not appear related to these comments. On page DEIS 3-35 there is a statement that "Some positive impacts on bird populations would result from increased use of wind energy. Increased wind energy, on a cumulative level, could slow the negative impacts of global climate change and air emissions on wildlife and people." The text goes on to say that, "Development of wind energy could also have adverse effects on birds (and bats) due to collisions and/or displacement from associated habitats. Studies have documented these negative impacts at some wind projects; however, numerous studies and reviews of avian impacts from wind energy projects in Europe and North America indicate that mortality rates are low, particularly when compared to other sources of bird mortality (Ericson et al., 2001; NWCC, 2004; GAO, 2005)."</p> <p>Thus, the DEIS stated that wind projects could have both positive and negative effects on birds. The positive effects were related to the potential for wind projects to lessen climate change. As stated in the comment, wind cannot totally substitute for existing power sources that may include fossil fuel sources.</p> <p>DEIS Section 3.1.7 (page 3-7) states, "The generation of electricity by the Facility will have a beneficial contribution to air quality, as it will avoid cumulative emissions from other non-renewable, fossil-fuel power sources. In addition, the Facility will cumulatively contribute to meeting the renewable energy targets for the State of Washington, lowering the amount of greenhouse gasses (GHGs) produced." Some climate change benefit will be gained with wind-powered projects.</p> <p>In regards to the discussion of climate change, numerous studies support the assertion that wind energy generation facilities contribute to an emissions savings for the overall power grid (AWEA, 2010). A recent study released by the American Wind Energy Association (AWEA) indicates that adding 100 megawatts (MW) of wind energy to the energy grid has the potential to reduce approximately 48 tons of CO<sub>2</sub> emissions per hour that would otherwise be created by fossil fuel-burning power plants (2010). Research conducted at the Fusion Technology Institute at the University of Wisconsin found that over the entire lifecycle, wind energy generation facilities abate more GHG emissions than are needed for their manufacture, installation, and operation (White and Kulcinski, 1999; White and Kulcinski, 1998). The DEIS does not make the claim that wind energy will reverse "global climate change". There is, however, a large body of research showing that greenhouse gas emissions from wind energy generation facilities are substantially lower than those from fossil fuel-</p>	No change to the text required.

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						<p>burning power plants.</p> <p>In regards to the discussion on wind power and its role in the energy market; comment noted.</p> <p>American Wind Energy Association (AWEA). 2010. "The Facts about Wind Energy's Emissions Savings." August 27. <a href="http://archive.awea.org/newsroom/pdf/08-27-10-Wind_and_emissions_response.pdf">http://archive.awea.org/newsroom/pdf/08-27-10-Wind_and_emissions_response.pdf</a>. Accessed March 21, 2011.</p> <p>White, S.W., and G.L. Kulcinski. 1998. "Net Energy Payback and CO<sub>2</sub> Emissions from Wind-Generated Electricity in the Midwest." UWFDM-1092. Fusion Technology Institute of Wisconsin. December. <a href="http://fti.neep.wisc.edu/pdf/fdm1092.pdf">http://fti.neep.wisc.edu/pdf/fdm1092.pdf</a>. Accessed March 21, 2011.</p> <p>White, Scott, and Gerald L. Kulcinski. 1999. "Birth to Death' Analysis of the energy payback Ratio and CO<sub>2</sub> Gas Emission Rates from Coal, Fission, Wind, and DT Fusion Electrical Plants." UWFDM-1063. Fusion Technology Institute of Wisconsin. February Revision (March 1998). <a href="http://fti.neep.wisc.edu/pdf/fdm1063.pdf">http://fti.neep.wisc.edu/pdf/fdm1063.pdf</a>. Accessed March 21, 2011.</p>	
336 KAR-A-71	Energy Issues	General	Karl and Associates; Pullman, WA	March 3, 2011	<p>"Federal courts have held that local and state governments violate the law if their regulations do not sufficiently restrain third-party actions that threaten endangered species. Because this imposes liability on governments for the criminal actions of individual constituents, the term "vicarious liability" is applied to describe the doctrine.</p> <p>In <i>Sierra Club v. Yeutter</i>, 926 F.2d 429 (5th Cir. 1991), the court held the Forest Service responsible for private timber harvesting conducted pursuant to the agency's timber management plan where the logging impaired the breeding, feeding, and sheltering practices of the endangered red-cockaded woodpecker (<i>Picoides borealis</i>). Following <i>Yeutter</i>, vicarious liability issues continued to appear in suits against other Federal defendants, such as <i>House v. United States Forest Serv.</i>, 974 F. Supp. 1022 (E.D. Ky. 1997), where the courts granted an injunction against U.S. Forest Service to prohibit the sale of timber because its removal by private parties would take the endangered Indiana bat (<i>Myotis sodalis</i>).</p> <p>In <i>United States v. Town of New Plymouth</i>, 6 F. Supp. 2d 81 (D. Mass. 1998), the United States brought an enforcement action against the town of New Plymouth, and the town was held liable for issuing annual permits to ORV users because the permit holders' riding on the town beach harmed the endangered piping plover (<i>Charadrius melodus</i>). <i>New Plymouth</i> is instructive because it was founded on evidence of actual death or injury to protected birds after repeated warnings from U.S. Fish and Wildlife Service and a factual pattern of extreme disregard for protection of breeding birds on the part of city officials.</p> <p>In <i>Strahan v. Coxe</i>, 127 F.3d 155 (1st Cir. 1997), cert. denied, 119 S. Ct. 81, and cert. denied, 119 S. Ct. 437 (1998), the First Circuit held that the Massachusetts Department of Fisheries' authorization of gillnet and lobster gear use by commercial fishing boats caused a take because endangered northern right</p>	<p>The cases cited in the comment are, with one exception, brought under the Endangered Species Act's (ESA's) citizen suit provision. The lone case brought by the federal government against a town is arguably similar. In <i>United States v. Town of Plymouth</i>, 6 F Supp 2d 81, 91 (D Mass 1998), the federal government sought injunctive relief against the town of Plymouth because the town's permissive regulation that allowed off-road vehicles on a beach was causing the take of plover chicks, which were being run over and killed by off-road vehicles. None of the cases cited involve criminal or civil liability under the ESA, which would require not only a violation of the ESA but a "knowing" violation. 16 U.S.C. § 1540(a)(1), (b)(1). Neither the bald eagle nor the golden eagle is listed under the federal ESA. While similar in some regards, the federal courts treat the ESA and Bald and Golden Eagle Protection Act as distinct.</p> <p>None of the ESA cases speaks to a relevant distinction between the ESA cases and criminal liability under the Bald and Golden Eagle Protection Act, which requires mens rea. The Bald and Golden Eagle Protection Act is not a strict liability criminal statute. Criminal liability under the Bald and Golden Eagle Protection Act requires that a taking be done "knowingly, or with wanton disregard for the consequences of [the person's] act." 16 U.S.C. § 668(a). This is a factual determination based on facts not in existence. Civil liability under the Bald and Golden Eagle Protection Act does not require a culpable mens rea; however, the Bald and Golden Eagle Protection Act provides that "the gravity of the violation, and the demonstrated good faith of the person charged shall be considered by the Secretary." Because the County does not enforce these federal laws, the County does not make these determinations.</p> <p>The County is responsible for reviewing the Proposed Action under applicable local and state laws which include issuing an</p>	No revision to text required.

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					<p>whales (<i>Balaena glacialis</i>) became entangled in the gillnets and lobster gear. The state argued that the licenses were not the proximate cause of harm to the whales because the harm was indirect, in other words, that the fishermen were an intervening and superseding cause. The court, however, rejected the argument, noting that section 9 encompassed indirectly caused harm. The state is the cause of the problem because it initiated the harm-causing activity. That the gillnetters and lobstermen serve as intervening causes presents a proximate cause question, but not a very difficult one.</p> <p>Consider the Eleventh Circuit's decision in <i>Loggerhead Turtle v. County Council of Volusia (Volusia County)</i>, 148 F.3d 1231 (11th Cir. 1998), cert. denied, 119 S. Ct. 1488 (1999) on remand, 92 F. Supp.2d 1296 (M.D. Fla.), related proceeding, 120 F. Supp.2d 1005 (M.D. Fla. 2000). The case involved a suit against the County for taking protected loggerhead sea turtles (<i>Caretta caretta</i>). Upon hatching, turtles "instinctively crawl toward the brightest light on the horizon." In nature, that light is the moon reflecting off the water, but "on a developed beach, the brightest light can be an artificial inland source." Turtles on some of the County's beaches were becoming disoriented by artificial beachfront lighting and crawling the wrong way to their death. The Eleventh Circuit found that because the County possessed "primary authority to regulate artificial beach-front lighting," it could be liable for "'harmfully' inadequate regulation of artificial beachfront lighting."</p> <p>Let us consider the Migratory Bird Treaty Act and the Bald Eagle Protection Act (which also addresses golden eagles). Neither of these statutes have the same citizen suit provisions of the ESA. However, they nonetheless contain prohibitions to take. If a party is not taking all reasonable measures to avoid or minimize such take or is acting in wanton disregard of the consequences, they maintain a liability under these statutes. The County, through issuing a Conditional Use Permit accepts their portion of that liability.</p> <p>We would recommend that prior to accepting this liability, the County would want to base its decision on a fact pattern that displays: 1. Due diligence in surveys and data collection; 2. SEPA documents that openly and honestly disclose potential effects and do so in an unbiased manner; and 3. Including measures within the Conditional Use Permit sufficient to demonstrate that all reasonable measures were taken to avoid the killing of protected species (such as migratory birds)."</p>	environmental impact statement that assesses probable, significant adverse impacts. Technical consultants have prepared an analysis that is consistent with applicable local and state law and regulations, the industry standard and with the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009). WDFW and USFWS were provided the opportunity to submit comments on this environmental review.	
<b>337 KAR-A- 72</b>	Energy Issues	Energy and Natural Resources	Karl and Associates; Pullman, WA	March 3, 2011	"For instance, the County should ensure that the appropriate surveys were completed and that they were conducted in a proper manner."	Please refer to the responses to Comment 45 (KIE-8), Comment 46 (KIE-9), Comment 49 (KIE-12), and 58 (KIE-21).	Please refer to the revisions in response to Comment 46 (KIE-9).

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<b>338</b> <b>KAR-A-73</b>	Energy Issues	Wildlife	Karl and Associates; Pullman, WA	March 3, 2011	"The County would be well advised to require First Wind to complete an Avian Bat Protection Plan that meets with approval for the Federal agencies prior to issuing a Conditional Use Permit."	Comment noted. Existing federal guidance regarding the preparation of Avian Bat Protection Plan (ABPP) and Eagle Protection Plan is still being drafted, is undergoing public review, and is open to public comment until May 19, 2011. As noted above, Palouse Wind will continue coordinating with U.S. Fish and Wildlife Service (USFWS) to address due diligence with respect to the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.  Preparation of an ABPP is not required by Whitman County Code, and the County does not enforce federal statutes.	No change to the text required.
<b>339</b> <b>KAR-A-74</b>	Energy Issues	Energy and Natural Resources	Karl and Associates; Pullman, WA	March 3, 2011	"First Wind should complete consultation with Washington Department of Fish and Wildlife, including all required minimization and mitigation requirements. The results of these efforts should be incorporated into a project proposal which is then released for public comment through the SEPA process."	Please refer to the response to Comment 45 (KIE-8). The results of these efforts were presented in the DEIS. The public was offered multiple opportunities to comment on the EIS. Public comment was solicited during the scoping period (August 26, 2010 to September 16, 2010), and after the submittal of the DEIS (November 18, 2010 to December 20, 2010) and the DEIS Addendum (March 3, 2011 to March 14, 2011).	No change to the text required.
<b>340</b> <b>WHI-A-1</b>	Health Impacts	General	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"Whitman County continues to ignore peer-reviewed, scientific evidence that demonstrates a public health threat exists whenever industrial wind turbines are sited near homes, in particular, Doctor Nina Pierpont's report <i>Wind Turbine Syndrome</i> ."	Please refer to the response to Comment 14 (WHI-9).	No change to the text required.
<b>341</b> <b>WHI-A-2</b>	Health Impacts	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"It is the duty of Whitman County to protect the public health. The willful failure to do so is a violation of law."	The Proposed Action will be designed and operated in accordance with applicable state and local requirements for wind-energy-generation facilities. See also the response to Comment 10 (WHI-5).	No change to the text required.
<b>342</b> <b>WHI-A-3</b>	Health Impacts	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"Whitman County knows the following facts:  1) Around the globe, people living near industrial wind turbines report adverse health effects due to the proximity of the turbines. (See Exhibit L of my September 3, 2010 <i>Comment on scope of EIS, Noise Radiation From Wind Turbines Installed Near Homes: Effects On Health</i> by Barbara J. Frey and Peter J. Hadden; and Exhibit M, A self-reporting survey: adverse health effects with industrial wind turbines and the need for vigilance.)"	The DEIS discusses the varying reactions to sounds from wind turbines. See DEIS pages 3-192 and 3-197.	No change to the text required.
<b>343</b> <b>WHI-A-4</b>	Low-frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"2) Industrial wind turbines produce large quantities of low frequency noise pollution. (See Exhibit A of my September 3, 2010 <i>Comment on scope of EIS, NASA's report Wind Turbine Acoustics</i> by Harvey H. Hubbard and Kevin P. Shepherd.)"	Please refer to the responses to DEIS Comment 6 (WHI-1) and DEIS Comment 12 (WHI-7).	Please refer to the revisions based on the responses to Comment 6 (WHI-1) and Comment 12 (WHI-7).
<b>344</b> <b>WHI-A-5</b>	Low-frequency Noise	Noise/Public Health	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"3) Extended doses of low frequency noise pollution pose a health threat to people because the low frequency noise pollution interacts with the inner ear, which is tied to numerous brain functions. Low frequency noise pollution is an invisible, usually inaudible danger to human health that, among other things, prevents people from sleeping. (See Exhibit F of my September 3, 2010 <i>Comment on scope of EIS, Wind Turbine Syndrome</i> by Doctor Nina Pierpont. Also see Exhibit H, Doctor Amanda Harry's report <i>Wind Turbines, Noise and Health</i> ; Exhibit D, France's National Academy of Medicine's report <i>The repercussions of wind turbine operation on human health</i> ; Exhibit C, Doctor Nuno A.A. Castelo Branco's report for NATO entitled <i>Low Frequency Noise: A Major Risk Factor in Military Operations</i> ; and Exhibit J, <i>Audiology Today's</i> cover story for	Please refer to the response to Comment 9 (WHI-4).	No change to the text required.

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					July/August 2010 entitled <i>Wind Turbine Noise: What Audiologists Should Know.</i> )"		
<b>345</b> <b>WHI-A-6</b>	Low-frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"4) Washington noise control laws are completely inadequate to protect people from low frequency noise pollution because state law uses the A scale to measure noise. The A scale discounts low frequency noise. When measuring low frequency noise the C scale should be used. (See Exhibit B of my September 3, 2010 <i>Comment on scope of EIS, Low Frequency Noise and Annoyance</i> by H. G. Leventhall.)  5) Washington law states, "The department [of Ecology] conceives the function of noise abatement and control to be primarily the role of local government and intends actively to encourage local government to adopt measures for noise abatement and control" WAC 173-60-110."	Regulatory Framework is discussed in DEIS Section 3.15.3 (beginning on DEIS page 3-183).  Please refer to the responses to Comment 6 (WHI-1), Comment 129 (GIB-9), and Comment 131 (GIB-11).	Please refer to the revisions based on the response to Comment 6 (WHI-1).
<b>346</b> <b>WHI-A-7</b>	Low-frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"There is an easy, practicable solution to protecting the public health from the low frequency noise pollution of industrial wind turbines, namely, the implementation of the following proposed ordinance:  <i>Residential property shall not receive a noise level of greater than 50 dBC between the hours of 7:00 a.m. and 10:00 p.m., and 40 dBC between the hours of 10:00 p.m. and 7:00 a.m.</i> "	Comment noted. Note that the quasi-judicial process of permitting a project is not a forum that is legally available for adopting new ordinances or legislation, which would apply county-wide. Commercial wind energy facilities are sited on a case-by-case basis by the Whitman County Board of Adjustment or a Hearing Examiner. Ordinances of Whitman County are passed by the Whitman County Board of Commissioners.	No change to the text required.
<b>347</b> <b>WHI-A-8</b>	Low-frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	"How many homes near the industrial wind turbine development will be bombarded with noise pollution over 50 dBC?  "If one were to make a noise contour map, similar to Figure 3.15-1 of the March 2011 Addendum to the Draft EIS, that shows the extent of low frequency noise pollution from the turbines measured at the 50 dBC level, then it will become obvious why Whitman County is willfully ignoring state laws (including Washington's Sate Environmental Policy Act RCW 43.21C.020 which requires Whitman County 'to use all practicable means to ... assure for all people safe, healthful ... surroundings').  An accurate noise contour map using the C scale, will show many homes within a 50 dBC noise level. I request that Whitman County produce such a map."	Whitman County utilizes Washington Administrative Code (WAC 173-60), including the dBA-weighted scale, to regulate noise impacts. The project application is vested to the development regulations in effect at the time the completed application was submitted, including the regulations at WAC 173-60 reflecting use of a dBA scale. The quasi-judicial process of permitting a project is not a forum that is available for adopting new ordinances or legislation. Commercial wind energy facilities are sited on a case-by-case basis by the Whitman County Board of Adjustment or a Hearing Examiner. Ordinances of Whitman County are passed by the Whitman County Board of Commissioners.  DEIS page 3-188 discusses circumstances where use of the C-weighted scale is common. Specifically, the dBC scale was referenced in other regulatory standards, where the 65-dBC level is used as a potential indicator for further study. It is also important to note that American National Standards Institute (ANSI) Standard B133.8 "Gas Turbine Installation Sound Emissions" establishes an approximate threshold of 75 to 80 dBC for complaints and perceptible vibrations.	

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<b>348</b> <b>WHI-A-9</b>	Low-frequency Noise	Noise	Roger Whitten Oakesdale, WA 99158	March 5, 2011	<p>“Protecting the people from the harm of low frequency noise pollution from industrial wind turbines would jeopardize the entire wind turbine development.</p> <p>“Whitman County wants the money that an industrial wind turbine development will bring, and it is willing to sacrifice the public health to get that money.</p> <p>“Whitman County is blatantly, knowingly, and willfully violating the law because the money is more important to them than the public health</p> <p>“Allowing an industrial wind turbine development to bombard people with harmful levels of low frequency noise pollution is a crime, and the officials in Whitman County government that are responsible for this crime should be held personally liable.”</p>	<p>Please refer to the response to Comment 6 (WHI-1). The DEIS addressed concerns over low-frequency noise levels raised during the scoping period.</p> <p>Neither the Washington Administrative Code (WAC) 173-60 nor the Washington State Environmental Policy Act (SEPA) is a criminal statute.</p>	Please refer to the revisions based on the response to Comment 6 (WHI-1).
<b>349</b> <b>WHI-A-10</b>	Property Value	Property Value	Roger Whitten Oakesdale, WA 99158	March 5, 2011	<p>“At the very least, the people whose homes will be invaded by low frequency noise pollution should be compensated for the theft of their property value. After all, who would by [sic] a home that is in an unhealthy environment?”</p>	Comment noted. Please refer to the response to Comment 132 (GIB-12).	Please refer to the revisions based on the response to Comment 132 (GIB-12).
<b>350</b> <b>WAL-A-1</b>	Recommended Condition	General	C.B. “Barney” Waldrop Pullman, WA 99163	March 5, 2011	<p>“Wind generation is significantly dependent on subsidization. Thus, its long-term commercial viability as an alternative energy source is subject to some question.</p> <p>Such being the case, it is my recommendation that the following or similar language be a part of any Whitman County permitting:</p> <p>‘Should a particular wind generator be inoperative and/or not generate power for a continuous period of six (6) months, the permittee shall remove the wind generator in its entirety and restore the site to its original natural state. A bond in sufficient amount shall be provided to Whitman County to insure compliance with this requirement.’”</p>	<p>Comment noted. A wind generator can become inoperative for a number of reasons unrelated to long-term viability of a project; for example, a single turbine could become inoperative for mechanical reasons, and require a lengthy period for repairs.</p> <p>As noted in DEIS Section 2.7, Palouse Wind is required to abide by the decommissioning requirements of WCC 19.61.060(14).</p>	No change to the text required.
<b>351</b> <b>GRE-A-1</b>	Unsignhtliness	Visual	Marlena Shahan Gregory Klamath Falls, Or 97603	March 7, 2011	<p>“As a property owner that is affected by the enclosed letter [March 3, 2011 Notice of Availability], I must say that I am opposed to the Wind Project of Steam Shovel Ridge. The wind turbines are unsightly to say the least and they are ruining the beautiful countryside. I grew up in Whitman County and you cannot find a more beautiful place to live anywhere. With the marginal electricity these things general I just cannot see the advantage.”</p>	<p>Comment noted. Section 3.9 of the DEIS and Section 3.9 of the DEIS Addendum provided sufficient analysis to describe and illustrate the existing character of the landscape. Furthermore, this analysis satisfies the visual resources requirement set forth in Whitman County Code (WCC) 19.61.060(13)(a).</p>	
<b>352</b> <b>YAK-A-1</b>	Regulatory Authority	Cultural Resources	Johnson Meninick Yakama Nation Cultural Resources Program Manager Toppenish, WA 98948	March 11, 2011	<p>“In reviewing the DEIS Addendum, we have identified plans for site avoidance that need correction in order to be compliant with the state law. Page 15 of the DEIS Addendum states:</p> <p>‘...the potentially impacted resources will be assessed for potential eligibility for listing on the NRHP prior to any ground disturbance within 100 feet (30.5 meters) of the resources. If DAHP deems the resources ineligible, ground disturbance will proceed. IF [sic] DAHP deems the resource eligible, additional consultation will take place with DAHP.’</p> <p>This statement is incorrect and must be amended in order to abide by state law RCW 27.53. Under RCW 27.53 prehistoric resources are protected regardless of eligibility, and only <i>historic resources</i> are protected based upon National Register of Historic Places criterion. Prior to the disturbance of any pre-</p>	<p>The text in the DEIS Addendum will be clarified to explain that only historic resources are protected based upon National Register of Historic Places criterion.</p> <p>Please refer to the response to Comment 190 (NPT-8).</p>	<p>Section 3.8 of the DEIS Addendum (page 15) will be revised as follows:</p> <ul style="list-style-type: none"> <li>• <i>Facilities will be sited to avoid identified historic resources to the maximum extent possible. If any of the historic resources identified during surveys previously completed cannot be avoided, the potentially impacted historic resources will be assessed for potential eligibility for listing on the NRHP prior to any ground disturbance within 100 feet (30.5 meters) of the resource. If DAHP deems the historic resource ineligible, ground disturbance will proceed. If DAHP deems the historic resource eligible, additional consultation will take place with DAHP.</i></li> <li>• <i>Prehistoric resources will be protected regardless of</i></li> </ul>

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					contact sites, RCW 27.53 requires a permit from the Department of Archaeology and Historic Preservation. It is imperative that the requirements of RCW 27.53 be understood and clarified. Failure to obtain permits prior to the disturbance of archaeological resources can result in criminal and civil penalties."		<u>NRHP eligibility. Prior to the disturbance of any prehistoric resource, a permit from the Department of Archeology and Historic Preservation will be obtained per RCW 27.53.</u>
<b>353 PPF-A-1</b>	TAC	General	David Hall, President Palouse Prairie Foundation, Moscow, ID 83843	March 13, 2011	<p>"We respectfully request that Palouse Prairie Foundation be granted representation on the Palouse Wind Technical Advisory Committee (TAC).</p> <p>The Palouse Wind project is located in the heart of the Palouse hills, which were once covered by Palouse Prairie. Less than 1% of the original prairie remains and it is considered one of this country's most endangered ecosystems by Washington Department of Fish and Wildlife. Figure 3.2-2: Maximum Habitat Impacts, submitted in the First Wind DEIS addendum, indicates that 6.5 acres of remnants will be disturbed temporarily and 0.88 permanently, plus another 2 acres impacted if an overhead collection system is used. In addition, ten acres (17%) of permanent impact area and 72 acres (24%) of temporary impact area are yet to be surveyed for habitat type.</p> <p>The Palouse Prairie Foundation can advise the project owner about proper mitigation techniques. It is the only organization whose members have the technical expertise and applied experience to provide information for effective mitigation actions to repair this endangered ecosystem. The Foundation's members include a retired USDA Plant Materials Center farm manager who developed native forb planting protocols, a local commercial native seed producer, and a large restoration project owner.</p> <p>Memberships of TACs across Washington State include relevant local environmental organizations such as the Audubon Society. We believe that Palouse Prairie Foundation has a vested interest in this project, that our participation is especially relevant for this region and, in particular, for the Palouse Wind facility."</p>	Comment noted. Palouse Wind will establish a TAC for this project. Please refer to the response to Comment 59 (KIE-22).	Please refer to the revisions based on the response to Comment 59 (KIE-22).
<b>354 VOG-A-1</b>	Surveys	Vegetation, Wildlife	William Vogel Olympia, WA 98512	March 13, 2011	<p>"Adequate surveys of the property were not conducted and were essentially non-existent on the expansion area.</p> <p>Any additional information gained from the new surveys being conducted need to be incorporated into a DEIS so that the public can comment on the entire action."</p>	<p>The expansion area was surveyed to the same extent as other areas (Steam Shovel Hill and Naff Ridge). The DEIS Addendum describes the fact that avian surveys are ongoing in 2011. Reports will be prepared and submitted to the County and WDFW for review. Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), Comment 58 (KIE-21), and Comment 200 (PAS-6)</p> <p>Additional micro-siting surveys will also be conducted in areas with ground disturbance if they have not been previously surveyed and this information will be provided to Whitman County, tribes, and appropriate agencies.</p>	No change to the text required.
<b>355 VOG-A 2</b>	Scenic Quality	Visual	William Vogel Olympia, WA 98512	March 13, 2011	"The scenic value of this area was not adequately addressed."	Comment noted. Please refer to the response to Comment 351 (GRE-A-1).	No change to the text required.
<b>356 VOG-A-3</b>	Impact to Turnbull Wildlife Refuge	Wildlife	William Vogel Olympia, WA 98512	March 13, 2011	"The relationship of this project to Turnbull NWR was not addressed."	Please refer to the responses to Comment 306 (KAR-A-41) and Comment 307 (KAR-A- 42)	No change to the text required.

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<b>357</b> <b>VOG-A-4</b>	Economic Analysis	Socioeconomics	William Vogel Olympia, WA 98512	March 13, 2011	<p>"The economic analysis seem critically flawed for several reasons:</p> <ol style="list-style-type: none"> <li>1. They do not even consider the industry in the County of photographic tours.</li> <li>2. They apparently use faulty inputs for lease rates and other variables</li> <li>3. Comparisons to Columbia and Garfield County are not appropriate.</li> <li>4. Faulty assumptions about source of employment and where they would stay</li> <li>5. Company used (Econ NW) notorious for overstating benefits"</li> </ol>	<p>The purpose of the analysis presented in DEIS Appendix I (<i>Economic Impacts of the Proposed Palouse Wind Project, Whitman Co, WA</i>; Yoder, 2010) is to determine the economic impact of the Proposed Action. The potential impact to photographic tours, a segment of the tourist industry is discussed in response to Comment 246 (VOG-3); a new subsection called "Impacts to Tourism" will be included in DEIS Section 3.16.4.2, after "Impacts to Property Values" and prior to the "Decommissioning Impacts" subsection (page 3-206).</p> <p>Regarding the inputs used to calculate lease rates, each lease contract with each developer can be different and is usually negotiated on an individual basis. Payments to landowners are usually a percentage of the gross revenues or are paid based on per-MW-generated basis. A recent report from the Government Accountability Office titled <i>Wind Power's Contribution to Electric Power Generation and Impact on Farms and Rural Communities</i> contains data indicating that lease payments for comparable wind energy facilities can be on the order of over \$5,000/MW/year (GAO, 2004). Additional anecdotal data indicates that most companies are paying \$4,000 to \$6,000 annually per megawatt of tower capacity for fixed-compensation packages and 3-5 percent of gross revenue from electricity sales for royalty compensation packages. Therefore, the inputs used to outline the economic benefits of lease payments are consistent with industry practice.</p> <p>Regarding comparisons made to other counties, the authors of the FEIS believe that the comment is addressing the Entrix (2009) study of property value impacts. Comparisons to other wind projects, especially ones that have been constructed, are useful in establishing the actual economic impacts realized from this type of development. The Wild Horse and Hopkins Ridge projects did result in additional employment opportunities resulting from construction and operation of these facilities.</p> <p>Regarding employment, DEIS page 3-203 states that sufficient skilled labor could be provided locally or regionally, which may result in workers commuting to the Proposed Action area on a daily or weekly basis. The construction work force is expected to be sourced from the local and regional vicinity, as is typical of a construction job of this magnitude that takes place in a rural setting.</p> <p>ECONorthwest was not contracted to prepare the economic analysis for the Palouse Wind. As noted on the cover page of DEIS Appendix I, the economic analysis for Palouse Wind was performed by Jonathan Yoder, Ph.D., Associate Professor, at the School of Economics, Washington State University, and Justin Taylor, MS, with 2L Data Solutions. A study conducted by ECONorthwest for the Desert Claim project (Kittitas County) was referenced in this study.</p> <p>Additionally, please refer to the responses to Comment 133 (GIB-13) and Comment 132 (GIB-12). The methodologies and assumptions used to complete the economic analysis presented in DEIS Appendix I and DEIS Section 3.16 adhered</p>	Please refer to the revisions based on the response to Comment 246 (VOG-3).

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						to accepted industry standards.  Eighteen full-time employees will be required for Facility operation. Given that the workers will be commuting to the site on a daily basis long term, it would be likely that they would pick housing that suits that need as well as the needs of their families (employment, schools, etc.) – and is expected to be closer to the Proposed Action site, but amongst the various communities.	
<b>358</b> <b>VOG-A-5</b>	Wildlife Surveys	Wildlife	William Vogel Olympia, WA 98512	March 13, 2011	<p>“Recommend company do adequate surveys of the entire area and then enter into an upfront SEPA process.</p> <p>This time, I would recommend that when people actually contact the company and or county and ask to be put on a mailing / contact list that you actually respond to them rather than “sneak” the document [sic] out for comment without notifying those people.”</p>	As discussed throughout the DEIS and relevant appendixes, surveys were conducted throughout the Proposed Action boundary, including areas of Steam Shovel Hill and Naff Ridge. Areas of ground disturbance within micro-siting corridors that have not already been surveyed will be surveyed prior to final site plan approval by Whitman County using the same methodologies presented in the DEIS. Regarding the public availability of the DEIS and the DEIS Addendum, please refer to the responses to Comment 268 (KAR-A-4) and 270 (KAR-A-6).	No revision to the text is required.
<b>359</b> <b>KIE-A-1</b>	SEPA Process	General	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	<p>“The writer indicates ‘based on similarity in adjacent habitats and land uses, it is <b>anticipated</b> [bold added] that the remaining 2,000 acres that have not been surveyed would present wildlife observations similar to those that were confirmed in areas that were field surveyed.’ This “anticipation” is contrary to what you, as County Planner, and the “responsible official” assured us during the planning stages of this development. You assured the Planning Board, as well as those of us in attendance at the planning workshops, that “thorough studies” would be undertaken. Assumptions ARE NOT studies.”</p> <p>The habitats are VERY different within just a 5 mile area. For example, there are quail living in locations near Steam Shovel Hill; however, to the south of Naff Ridge, in the Trestle Creek area, a mile off of Highway 195, there are none. Just as there are <i>micro-climates</i> interspersed throughout the Palouse, there are also <i>micro-habitats</i>, if you will, where one finds species which are not found in another area that is within a 5-mile radius.”</p>	<p>While approximately 2,000 acres were added to the Proposed Action boundary through the revisions of the February 2011 Amendment to the CUP application, only 800 of these acres have been included within the micro-siting corridor being examined for potential development. Furthermore, portions of these areas have already been surveyed, as both desktop and field surveys were conducted with study areas that went beyond the original Proposed Action boundary as presented in the DEIS. For example, all 800 acres of newly added micro-siting corridor was desktop surveyed for wetlands. In addition, approximately 170 acres of newly added micro-siting corridor has already been field surveyed for wildlife and vegetation resources, and approximately 50 acres has already been surveyed for rare plant species.</p> <p>Areas of ground disturbance within micro-siting corridors that have not already been surveyed will be surveyed prior to final site plan approval using the same methodologies presented in the DEIS. If protected resources are found, the applicable mitigation measures discussed in the DEIS would be implemented. Please refer to the response to Comment 354 (VOG-A-1).</p>	<p>The following text will be added to the section of the DEIS Addendum titled “Revisions to the Affected Environment, Environmental Consequences, and Mitigation” (page 8) following the existing paragraph:</p> <p><u>As noted previously, the Proposed Action now encompasses approximately 9,000 acres, corresponding to the total acreage of leased lands participating in the CUP application. However, ground disturbance would only be permitted within the micro-siting corridor. The DEIS considered a micro-siting corridor of approximately 3,600 acres for the Naff Ridge Area, and approximately 800 acres for the Steam Shovel Hill area, for an approximate total of 4,400 acres. Palouse Wind surveyed the majority of this acreage, with small exceptions on a resource-by-resource basis.</u></p> <p><u>While approximately 2,000 additional acres were added to the Proposed Action boundary through the revisions of the February 2011 Amendment to the CUP application, only 800 of these acres have been included within the micro-siting corridor being examined for potential development. Furthermore, portions of these areas have already been surveyed, as both desktop and field surveys were conducted with study areas that went beyond the original Proposed Action boundary as presented in the DEIS. For example, all 800 acres of newly added micro-siting corridor was desktop surveyed for wetlands. In addition, approximately 170 acres of newly added micro-siting corridor has already been field surveyed for wildlife and vegetation resources, and approximately 50 acres has already been surveyed for rare plant species.</u></p> <p><u>Areas of ground disturbance within micro-siting corridors that have not already been surveyed will be surveyed prior to final site plan approval using the same methodologies presented in the DEIS. If protected resources are found, the applicable mitigation measures discussed in the DEIS would be implemented.</u></p>

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<b>360</b> <b>KIE-A-2</b>	Additional Wildlife Studies	Wildlife	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"STUDIES MUST BE DONE in order to determine if there are <i>protected species</i> or <i>species of concern</i> living in each habitat. How can Whitman County, and the developer, in good conscience, say that species have been accounted for, when the field-work has not been done to ascertain this information?"	Please refer to the responses to Comment 206 (PPF-3) and Comment 209 (PPF 6), and Comment 354 (VOG-A-1).	No change to the text required.
<b>361</b> <b>KIE-A-3</b>	Additional Wildlife Studies	Wildlife	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"Also, the <i>Washington Department of Fish and Wildlife Wind Power Guidelines</i> indicates that in those locations where no previous studies have ever been done, and no "like" habitats surveyed, that TWO YEARS of studies must be undertaken. Even though the developer is saying the areas they have already surveyed are "similar" -- there has NOT been TWO YEARS of studies done in those areas. The Guidelines have not been followed. (The addition of another 3 months of avian use in 2011, from January through March, does not constitute two years of studies!)"	Please refer to the responses to Comment 354 (VOG-A-1), and Comment 359 (KIE-A-1).  The WDFW <i>Wind Power Guidelines</i> (WDFW, 2009) specify that pre-project assessment "may utilize relevant information from projects in comparable habitat types in locations close to the proposed project." The purpose of conducting additional avian surveys in some areas is to give Palouse Wind a higher level of confidence on existing data and to address DEIS comments.	Please refer to the revisions based on the response to Comment 359 (KIE-A-1).
<b>363</b> <b>KIE-A-4</b>	Noise Mitigation	Noise	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"3.15 Noise This Addendum also indicates that 'Figure 3.15 has been updated to reflect the noise contours that would result from a Facility consisting of up to 65 turbines located in the revised Proposed Action area. Mitigation of operational noise impacts is primarily a function of siting the turbines so that the project meets the noise thresholds established by the Washington State Department of Ecology.' This Addendum does nothing further to mitigate harm to residents living in the project area around the newly added 2,000 acres. Nor did the DEIS address harm to rural residents in the initial project site."	The DEIS discusses the varying reactions to sounds from wind turbines. See DEIS pages 3-192 and 3-197. Additionally, please refer to the responses to Comment 6 (WHI-1) and Comment 12 (WHI-7).	Please refer to the revisions based on the response to Comment 6 (WHI-1) and Comment 12 (WHI-7).
<b>364</b> <b>KIE-A-5</b>	State Noise Standards	Noise	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"The Department of Ecology does not provide noise standards sufficient to keep rural residents safe from low frequency sound waves. The Washington Noise Standards, adopted in 1974, are based on an incorrect scale for measuring low frequency sound waves. At the time those guidelines were formulated, wind turbines were not considered and the scale with which sound is quantified is inadequate for the low frequency sound wave emissions from wind turbines."	Please refer to the response to Comment 6 (WHI-1). The DEIS addressed concerns over low-frequency noise levels raised during the scoping period.	Please refer to the revisions based on the response to Comment 6 (WHI-1).
<b>365</b> <b>KIE-A-6</b>	Noise Impacts	Noise	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"The County is well aware of material submitted supporting the argument that these projects cause physical harm. They know this project will do harm to those living where there is a direct path for sound waves from turbines to invade their property and their residences."	Comment noted.	Not change to the text required.
<b>366</b> <b>KIE-A-7</b>	Noise Impacts	Noise	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"The material shows this harm in other states. The County would do well to look to Idaho, where there is currently a bill introduced to put a moratorium on wind farms, 'Republican Rep. Erik Simpson of Idaho Falls says the moratorium is needed to give officials time to study the ramifications of the projects on the state's economy, the environment, and on energy bills received by consumers.'"	Comment noted.	No change to the text required.
<b>367</b> <b>KIE-A-8</b>	Low Frequency Sound	Noise	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	"If the County is interested in protection of the public's health from low frequency sound waves, I would agree with a previous simple solution posed by Mr. Roger Whitten. A simple fix would be to: 'limit noise levels of greater than 50 dBC between 7:00 a.m. and 10:00 p.m., and 40 dBC between 10:00 p.m. and 7:00 a.m.'"	Please refer to the response to Comment 347 (WHI-A-8).	No change to the text required.

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<b>368</b> <b>KIE-A-9</b>	Project Scope	General	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	<p>"The last comment that I have about this addendum is that this developer is continually changing the scope of the project. Each time their changes more negatively impact the wildlife habitat and the residents living in the project area.</p> <p>First, they were going to install only 50 turbines; then, it went to 55 turbines and now it has increased to 65 turbines. Additionally, the turbine height started out as one figure, then another figure, and now the height is up to a possible 492 feet, but that is not yet even confirmed in this report because the developer says it is only the 'worst-case scenario.'</p> <p>With this kind of "planning" it seems as though the County is simply giving the developer <i>carte blanche</i> to change whatever figures they want, any time they want. This is not so much a plan, as it is a <i>liquid sketch</i> of what the developer thinks they want to do at any one given point in time, <i>which seems constant only in it's [sic] continual metamorphosis.</i>"</p>	<p>Comment noted. DEIS addenda are permitted under Washington Administrative Code (WAC), and the content and analysis provided in the DEIS Addendum complies with WAC 197-11-625.</p> <p>The information regarding turbine specifications presented in both the DEIS and the DEIS Addendum is based on the best available data. Because turbine technology evolves quickly, Palouse Wind requests the flexibility to select the type, size, and vendor for the turbine technology when Proposed Action design is complete. The analysis included in the DEIS Addendum presents the maximum potential impacts, meaning that potential impacts resulting from the Proposed Action are not anticipated to exceed those outlined in the DEIS Addendum. Similarly, turbine numbers and specifications are not anticipated to exceed those outlined in the DEIS Addendum.</p>	No change to the text required.
<b>369</b> <b>KIE-A-10</b>	DEIS Addendum	General	Carolyn Kiesz Thornton, WA 99111	March 14, 2011	<p>"In reviewing the developer's Addendum, I find a very telling expression that is used in their text more than once. It is the use of the expression "worst-case scenario." Based on my research and contact with other rural residents living in project areas, I find the use of this expression to be prophetic. The use of this expression is a forecast of the transformation of many rural County residents into individuals "with standing" in a Court of Law."</p>	Comment noted.	No change to the text required.
<b>370</b> <b>HAL-A-1</b>	Water Rights	Water Resources	David Hall Moscow, ID 83843	March 14, 2011	<p>"Addendum Table 3.7-1 indicates that the total maximum water consumption during construction will be 13 million gallons. Water consumption for operations and maintenance are to be less than 5,000 [gallons] per day—or 1,825,000 gallons per year.</p> <p>The DEIS says that the impact on water resources is insignificant. If the water is to come from the Grande Ronde aquifer, then it is not a mammoth percentage of the water withdrawn in a year from that declining resource, but it is nonetheless a substantial amount of water. The EIS should consider the cumulative effects of water use.</p> <p>The DEIS is too vague as to the source of the water to be used during construction: "... water will be supplied to the Proposed Action area from landowners or municipalities with compatible existing water rights" [DEIS section 3.6.4.1].</p> <p>No municipality serves that area as far as I know, and there may be issues with municipalities selling water to an operation outside the municipality's boundaries or jurisdiction.</p> <p>Whose water rights will be used? Can water from local landowner wells, intended for domestic use, legally be put to such commercial uses?"</p>	<p>Water used during construction of the Facility will likely be obtained from offsite sources. Water may be supplied to the Proposed Action from the Grande Ronde aquifer, the shallower Wanapum Basalt aquifer, or shallower aquifers located close to the ground surface. In 2009, approximately 2.8 billion gallons of water was pumped from the Palouse groundwater basin (PBAC, 2010). While 13 million gallons is a large volume of water, it is insignificant when compared to water usage within the basin, and the volume of the groundwater aquifers. Regardless of the final water source Palouse Wind selects, water in amounts allowed by Washington law will be supplied in accordance with state law.</p> <p>Water used during operation of the Facility will likely be obtained from either an existing or new domestic well. It is anticipated that water would be obtained from either an existing or a new domestic well that delivers less than 5,000 gallons per day. Such wells are deemed exempt by the Department of Ecology.</p> <p>Regarding the cumulative impacts of water use, please refer to the response to Comment 379 (PPF-A2-7).</p> <p>Palouse Basin Aquifer Committee (PBAC). 2010. <i>Palouse Groundwater Basin Water Use Report</i>. <a href="http://www.webs.uidaho.edu/pbac/">http://www.webs.uidaho.edu/pbac/</a>. Accessed March 15, 2011.</p>	No change to the text required.
<b>371</b> <b>HAL-A-2</b>	Water Source	Water Resources	David Hall Moscow, ID 83843	March 14, 2011	<p>"Similarly, the DEIS is too vague about the source of water to be used during operations: 'Water necessary for Facility operations will be obtained in accordance with Washington State Law and local requirements.'</p>	<p>A determination of significance was issued for this Proposed Action. As stated in Response to Comment 370 (HAL-A-1), Palouse Wind will obtain water from existing water sources with compatible water rights. At the time these water rights are certified, the Department of Ecology reviews the amounts of</p>	No change to the text required.

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					Sources of the water should be specified in the EIS. How can a determination of non-significance be proffered without that disclosure or knowledge?"	withdrawal and assesses the impacts of such amounts on water availability from these sources. Palouse Wind would obtain and use water within the specific conditions of these rights.  With respect to operations water use, it is anticipated that water would be obtained from either an existing or a new domestic well, that delivers less than 5,000 gallons per day. Such wells are deemed exempt by the Department of Ecology.	
<b>372</b> <b>HAL-A-3</b>	Use of non-drinking water	Water Resources	David Hall Moscow, ID 83843	March 14, 2011	"If possible, non-drinking-quality water should be used, and alternatives should be sought to reduce the amount of water used.  The Conditional Use Permit, if issued, should be contingent upon Palouse Wind showing proof of sufficient and appropriate water rights."	Please refer to the response to Comment 370 (HAL-A-1). Water usage will be minimized to the extent practicable. Water used for dust suppression will likely contain soil binders and tackifiers to minimize the total volume of water used during the construction of the Proposed Action.	No change to the text required.
<b>373</b> <b>PPF-A2-1</b>	Avoidance of Palouse Prairie	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	"Towers which are proposed in the DEIS to be located in Palouse Prairie habitat must not be placed there. This is more than "micrositing;" the proposed towers located in and adjacent to that habitat on Granite Butte (Granite Knob) as proposed within the DEIS, those adjacent to Palouse Prairie in the Steam Shovel Expansion Area, and the other towers adjacent to Palouse Prairie habitat should be removed from consideration in the final EIS. Table 3.2-2 in the Addendum to the DEIS states that 1.99 acres of native perennial grassland would be impacted if a portion of the collection system is constructed overhead. This potential impact also should be avoided."	Comment noted. Please refer to the response to Comment 281 (KAR-A-17).	Please refer to the revisions based on the response to Comment 281 (KAR-A-17)).
<b>374</b> <b>PPF-A2-2</b>	Avoidance of Palouse Prairie	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	"If only one alternative is presented in the Palouse Wind final EIS, then it should be one in which no towers are locate within, adjacent to, or within harm's way of Palouse Prairie habitat. If more than one alternative is presented, then the Final EIS should include an alternative in which no wind towers are placed in, adjacent to, or within harm's way of Palouse Prairie habitat. That alternative should be the preferred alternative.  In their comments to Whitman County Planning on the draft EIS, the Washington Department of Fish & Wildlife recommends that <i>there be no impacts to native perennial grasslands (Palouse Prairie)</i> [emphasis added]:  Based on Table 3.2-2, page 3-20, temporary and permanent impacts are likely to occur to native perennial grasslands in both the Proposed Action Area and Steam Shovel Action Area. While these impacts total approximately 3% of those anticipated, they will impact a unique habitat type that is important to native and migratory bird and mammal species that are dependent on these grassland habitats. The avian use surveys detected the presence of grasshopper sparrows and savannah sparrows in the project area. In our December 6th meeting with representatives from First Wind, we expressed our concerns regarding this habitat type as it represents remnants of the once vast Palouse Prairie. This fact alone makes these habitat areas all the more valuable to species. We are only beginning to attempt restoration of these sensitive habitats and at [sic] are not confident in our ability to successfully do so. It is our concern that temporary impacts will represent permanent impacts in these types of sensitive native habitats. ... At this point in time, WDFW recommends that there	Please refer to the responses to Comment 139 (GIB-19) and Comment 87 (WNPS-2) regarding the issue of Palouse Prairie habitat. Regarding the issue of alternatives, SEPA only requires the analysis of two alternatives (Proposed Action and No Action) for private projects. Analysis of these alternatives is included in the DEIS.	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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					be no impacts to native perennial grasslands (Palouse Prairie)."		
<b>375</b> <b>PPF-A2-3</b>	Special Status Species/ Habitats	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	"Whitman County's commercial wind farm regulations specify a need to flag areas of sensitive habitat (Palouse Prairie surely would qualify), and assure that the sensitive areas are avoided (not harmed and 'mitigated' in some way) (section 19.61.060(F)):  19.61.060 - Development Standards and Criteria – F. Vegetation and wildlife construction limitations: ... applicant shall limit construction disturbance by flagging sensitive areas ... to assure that flagged areas are avoided. ...."	Please refer to the response to Comment 87 (WNPS-2) and response to Comment 205 (PPF-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>376</b> <b>PPF-A2-4</b>	Special Status Species/ Habitats	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	"Likewise, the U.S. Fish and Wildlife Service prefers avoidance of sensitive habitats:  After assessing potential risk from exposure to various factors ... and portions of a project..., the developer should take appropriate steps to avoid or minimize effects. ... avoidance ... is typically the preference of the Service. [www.fws.gov/windenergy/docs/Wind_Energy_Guidelines_2_15_2011FINAL.pdf p. 12]  Wind project development results in direct habitat loss and habitat modification, especially at sites previously undeveloped. Many of North America's native landscapes are greatly diminished or degraded from multiple causes unrelated to wind energy. Important remnants of these landscapes are identified and documented in various databases held by private conservation organizations, state wildlife agencies, and, in some cases, by the Service. Species that depend on these landscapes are susceptible to further loss of habitat, which will affect their ability to reproduce and survive. While habitat lost due to footprints of turbines, roads, and other infrastructure is obvious, less obvious is the potential reduction of habitat quality. [ibid p. 10]  Habitat fragmentation and site modification are important issues ... Identify areas of high sensitivity due to the presence of blocks of native habitats, paying particular attention to known or suspected "species sensitive to habitat fragmentation." [ibid p. 11]  Figure 3.2-1, Habitat Types, in the DEIS shows "native perennial grassland" (Palouse Prairie) within the Steam Shovel Expansion Area (figure right, below) as well as on Granite Butte (below, left). It appears that one tower is proposed to be located immediately adjacent to Palouse Prairie habitat within the expansion area. That tower should either be removed from consideration, or be moved so as to have no impact on the remnant during either construction or operation. The towers proposed for Granite Butte should be removed as well."	Comment noted. Please refer to the responses to Comment 87 (WNPS-2) and Comment 147 (HAL-2).  Palouse Wind will microsite Proposed Action facilities to avoid native habitats to the maximum extent practicable. Areas that are to be avoided will be flagged and identified as "No Work Areas." During operation, all work will be conducted on existing roads, turbine pads, etc.	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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Comment Number	Issues Raised	EIS Category	Commenter	Date Comment Received	Comments	Response to Comment	Documents and Pages in which Comment is Addressed
<b>377</b> <b>PPF-A2-5</b>	Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The Grande Ronde aquifer system—our source of water on the Palouse—is a non-renewing resource of very high quality water. Water levels in the Grande Ronde aquifer are dropping about one foot per year. "The water we're consuming most likely seeped into the Grande Ronde basalts during the last ice age, when the Palouse was covered with water. It is 10,000-20,000 years old, pristine as well as irreplaceable. Soil research shows that little precipitation is able to penetrate to the basalt layers from which we draw our water. .... Once our groundwater is gone, it will never be restored (at least not on a human time scale)." [Palouse Water Conservation Network, www.pwcn.org]</p> <p>The original DEIS states, "It is estimated that 50,000 gallons per day of water will be used for dust suppression and road maintenance. Additionally, up to 35,000 gallons per day will be used for concrete production. It is estimated that a maximum of 10 million gallons of water will be used for the duration of Facility construction. As previously discussed, water will be supplied to the Proposed Action area from landowners or municipalities with compatible existing water rights." [DEIS section 3.6.4.1]"</p>	Please refer to the response to Comment 370 (HAL-A-1).	No change to the text required.
<b>378</b> <b>PPF-A2-6</b>	Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"Those figures increase with the inclusion of the Steam Shovel Expansion Area; DEIS Addendum Table 3.7-1, "Summary of Potential Energy and Natural Resources Requirement," indicates that the total maximum water consumption during construction would be 13 million gallons – up to 11,700,000 gallons for dust suppression and up to 536,400 gallons for cement – for the life of the project, for the 65-turbine layout. Water consumption for operations and maintenance are to be less than 5,000 [gallons] per day [ibid]—or 1,825,000 gallons per year.</p> <p>Are there better options for dust abatement and cement than using 13 million gallons of our drinking water?"</p>	Soil binders and tackifiers will be used during construction of the Proposed Action for dust minimization, as required by the County. The use of soil binders and tackifiers will greatly reduce the total volume of water used during construction.	No change to the text required.
<b>379</b> <b>PPF-A2-7</b>	Impact on Water Resources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The DEIS says that the impact on water resources is insignificant. But water use adds up. Federal guidelines stipulate that cumulative effects be considered."</p>	Comment noted. Whitman County has prepared the EIS and conducted its review under SEPA, according to the applicable regulations of WCC Chapter 9.04 and applicable Washington Department of Ecology regulations (WAC 197-10-955 through WAC 197-11-955). Cumulative impacts have been considered as required by these regulations. Water withdrawals are controlled through water rights, and as such, the State along with local Water Masters consider the cumulative effects of water usage. Please refer to the response to Comment 370 (HAL-A-1).	No change to the text required.
<b>380</b> <b>PPF-A2-8</b>	Construction Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The DEIS is not sufficiently specific as to where the water used during construction will come from. The assertion that "water will be supplied to the Proposed Action area from landowners or municipalities with compatible existing water rights" is too vague."</p>	Please refer to the responses to Comment 370 (HAL-A-1), Comment 371 (HAL-A-2), Comment 378 (PPF-A2- 6), and Comment 379 (PPF-A2-7).	No change to the text required.

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<b>381</b> <b>PPF-A2-9</b>	Construction Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"Will Grande Ronde aquifer water be used? Or will it be water from shallower wells? Will it be surface water? If it is surface water, the majority of it would likely be trucked in from off site; how will the project keep potential invasive plant seeds from being transported and introduced?"</p> <p>"The water used during construction will either evaporate, or infiltrate into adjacent pastures or farmland. Impacts related to water use are not anticipated." Water broadcast near native prairie habitat could negatively affect the native habitat by altering the hydrologic balance. If water is trucked in, then non-native seeds, either from the water (if surface water), or from the vehicle tanks, could be introduced. This would be a negative impact on native vegetation."</p>	Buffers will be created around sensitive areas to prevent impacts to these resources. The minimum volume of water will be used during construction to control dust, and as such, water is not anticipated to leave the roadway. Water will be provided in a limited quantity, and applied on an as-needed basis. Given the application methods typically used (spray truck), it is very unlikely that the water would flow (either concentrated or sheet flow) off of the roads and then flow through adjacent areas. Any water that did leave the roads, would likely infiltrate or evaporate in a close proximity to the roads. As previously discussed, water is a limited resource in the area, and over application of water would not be cost effective.	No change to the text required.
<b>382</b> <b>PPF-A2-10</b>	Operational Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	"Similarly, the DEIS is not sufficiently specific as to where the water used during operations will come from. This water will be used primarily to meet the needs of the operations and maintenance building. "Water necessary for Facility operations will be obtained in accordance with Washington State Law and local requirements." Again, this is vague. It is unlikely that such water would be trucked in. And the Facility is not within any municipality's reach."	Please refer to the responses to Comment 370 (HAL-A-1), Comment 371 (HAL-A-2), Comment 378 (PPF-A2- 6), Comment 379 (PPF-A2-7), and Comment 381 (PPF-A2-9).	No change to the text required.
<b>383</b> <b>PPF-A2-11</b>	Stormwater Runoff	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	"During operation, "Additional stormwater will likely run off into underdeveloped pastureland or farmland and infiltrate." This stormwater runoff would be detrimental to native Palouse Prairie remnants. Again, this water could change the hydrologic balance, and it has the potential for carrying and delivering non-native seeds."	A Stormwater Control Plan drawn up by an engineer licensed in the state of Washington is required for this Proposed Action. The construction of the Facility will not significantly change the infiltration rates, and capacity of the localized watershed. During operations, stormwater that sheds from developed project surfaces will be directed to appropriate conveyances. These conveyances will include check dams, and other Best Management Practices (BMPs) to minimize stormwater velocities and to promote infiltration. All conveyances and associated BMPs will be designed and selected from the <i>Eastern Washington Stormwater Manual</i> (Ecology, 2006).	No change to the text required.
<b>384</b> <b>PPF-A2-12</b>	Water Sources	Water Resources	David Hall, President Palouse Prairie Foundation	March 14, 2011	"The sources of the water need to be specified in the final EIS. Non-drinking-quality water (surface water) should be used, and alternatives should be considered to reduce the amount of water used. This reduction in water use is important both to reduce resources used (clearly our valuable water itself, and secondarily the resource costs of hauling and applying the water), and to reduce the amount that the landscape is altered hydrologically."	Water will be obtained from an appropriate existing water right. Best Management Practices (BMPs) such as soil binders and tackifiers will be used to minimize the amount of water that will be used for dust suppression. Water will be applied at a rate and quantity that will not allow water to be pooled, or flow through the Facility. The minimum amount of water needed to suppress the dust will be used. Please refer to the responses to Comment 370 (HAL-A2-1) and Comment 378 (PPF-A2-6).	No change to the text required.
<b>385</b> <b>PPF-A2-13</b>	Inadequate Surveys	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	"We believe that the data collected to support the findings in the DEIS for flora and fauna on the site are inadequate. For example, the studies performed for data collection were not performed with enough frequency or over a long enough time to truly reflect reality, and it is not sufficient to extrapolate and compare "similar" sites since the Palouse hills are unique."	Please refer to the responses to Comment 209 (PPF-6) and Comment 354 (VOG-A-1).	No change to the text required.
<b>386</b> <b>PPF-A2-14</b>	Micrositing Habitat Surveys	Vegetation, Wildlife	David Hall, President Palouse Prairie Foundation	March 14, 2011	"The proposal to conduct habitat and special status plant species surveys in micrositing areas proposed for ground disturbance that were not previously surveyed (Addendum p. 10) is inadequate. Some special status plant species are hard to find and might not be apparent during the short amount of time that would likely be allotted for micrositing."	Any additional plant surveys will be conducted following Washington Natural Heritage Program (WNHP) survey protocol at species-appropriate bloom times for the special status species likely to occur in the vicinity of the Proposed Actions.	No change to the text required.

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<b>387</b> <b>PPF-A2-15</b>	Inadequate Wildlife Surveys	Wildlife	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The wildlife surveys were inadequate. Surveying for "special status wildlife" for only two days is far from adequate. The giant Palouse earthworm was addressed only through a "desktop review." [Palouse Audubon Society comments to Whitman County Planning on the draft EIS]</p> <p>Avian surveys did not cover the project area. Raptor surveys did not cover the entire project area. Nocturnal surveys were not conducted. The ecological baseline survey is incomplete and does not include the entire project area. [ibid]</p> <p>The deficient studies should be completed properly before the final EIS can be accepted."</p>	Please refer to the responses to Comment 45 (KIE-8), Comment 49 (KIE-12), Comment 57 (KIE-20), Comment 58 (KIE-21), and Comment 200 (PAS-6).	Please refer to the revisions based on the response to Comment 49 (KIE-12) and Comment 57 (KIE-20).
<b>388</b> <b>PPF-A2-16</b>	Siting on Disturbed Areas	General	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The siting of the proposed project is partially right – primarily on heavily disturbed, agricultural land. It must be placed entirely on disturbed lands.</p> <p>"Wind power has the ability to be a green, bird-friendly form of power generation, but can also adversely affect birds. Birds can die in collisions with the turbine..., towers, power lines, or related structures, and can also be impacted through habitat destruction from the siting of turbines, power lines, and access roads. Some birds, such as sage-grouse are particularly sensitive to the presence of turbines, and can be scared away from their breeding grounds several miles away from a wind farm. ... Potentially all night-migrating songbirds are at risk of colliding with wind turbines, as are raptors and waterbirds ... Wind energy project location, design, operation, and lighting should be carefully evaluated to prevent bird mortality, as well as adverse impacts caused by habitat fragmentation, disturbance, and site avoidance. Wind power projects should be sited on areas with poor habitat where possible, such as heavily disturbed lands, (e.g. intensive agriculture)." [American Bird Conservation, American Bird Conservancy's Policy Statement on Wind Energy, <a href="http://www.abcbirds.org/abcprograms/policy/collisions/wind_farms.html">www.abcbirds.org/abcprograms/policy/collisions/wind_farms.html</a>]"</p>	Comment noted. The Palouse Wind project is sited in accordance with WDFW <i>Wind Power Guidelines</i> (WDFW, 2009), Whitman County's Comprehensive Plan and Whitman County's Code, Chapter 19.61, Commercial Wind Energy Facilities. As noted from the quote cited in the comment, "Wind power projects should be sited on areas with poor habitat where possible, such as heavily disturbed lands (e.g. intensive agriculture)." The Palouse Wind Facility will be sited primarily on cropland, and habitat with higher value will be avoided where possible.	No change to the text required.
<b>389</b> <b>PPF-A2-17</b>	Mitigation	Impact Areas	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"The Final EIS must clearly specify mitigation measures. There was no discussion in the Draft EIS of the mitigation acres required—nor where they would be, nor how they would be managed."</p>	<p>The FEIS outlines multiple mitigation measures proposed to minimize the impacts to wildlife. These mitigation measures have been developed in consideration of the WDFW <i>Wind Power Guidelines</i> (WDFW, 2009), WDFW will be consulted to ensure compensatory mitigation measures developed for impacts to habitat are also in accordance with the WDFW <i>Wind Power Guidelines</i>. Please see Table ES-3, Summary of Impacts, and Proposed Mitigation Measures for the Palouse Wind Project.</p> <p>Additionally, please refer to the response to Comment 87 (WNPS-2).</p>	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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<b>390</b> <b>PPF-A2-18</b>	Prairie Restoration	Vegetation	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"Mitigation by digging up plants to set aside and then replant is not possible for native prairie plants whose roots are 8 to 10 feet long. Nor is reseeding areas with native seed practical; many of these seeds are not available commercially to do the job.</p> <p>Although prairie restoration has been attempted on a small scale, to date, it brings back only a semblance of the prairie. The Prairie can likely not be truly fully restored by man. Compacted soils cannot be uncompacted. Damaged "popcorn" soils cannot be replaced.</p> <p>If other land is purchased as a mitigation measure, who will watch over it and maintain it? The local land trust is the Palouse Land Trust; perhaps they would have a role in providing conservation easements or being given title to Palouse Prairie habitat."</p> <p><i>[NOTE: The comment letter quotes several paragraphs from the Karl and Associates letter; please see copies of the original letters included herein.]</i></p>	Comment noted. Please refer to the responses to Comment 281 (KAR-A-17) and Comment 389 (PPF-A2-17). Palouse Wind will coordinate with WDFW and the Palouse Prairie Foundation to develop suitable compensatory mitigation for Palouse Prairie habitat.	No change to the text required.
<b>391</b> <b>PPF-A2-19</b>	Conditions of Approval	General	David Hall, President Palouse Prairie Foundation	March 14, 2011	"If this project is approved, perhaps a condition of acceptance would be that the leasing permits would be written such that any quality Palouse Prairie habitat in the project area be preserved in perpetuity (such as through an easement with the Palouse Land Trust) as a condition of a landowner leasing land to the developer."	Please refer to the response to Comment 389 (PPF-A2-17). If long-term protection of a property were ultimately decided upon as a mitigation measure, WDFW would be consulted to ensure the appropriate title protections are established.	No change to the text required.
<b>392</b> <b>PPF-A2-20</b>	TAC	General	David Hall, President Palouse Prairie Foundation	March 14, 2011	<p>"We are heartened to hear that a Technical Advisory Committee (TAC) will be specified in the final EIS.</p> <p>We feel that it should not be Palouse Wind which specifies the makeup of the committee. We respectfully suggest that the committee consist of representatives from the following:</p> <p>Whitman County Planning Department Whitman County Commissioners U.S. Fish and Wildlife Service Washington Department of Fish and Wildlife Palouse-Rock Lake Conservation District Palouse Audubon Society Palouse Prairie Foundation Palouse Wind or any future owner of the project Two landowners (one leasing and one not leasing property to wind projects)</p> <p>The TAC should exist for the life of the project and be maintained regardless of changes in ownership. The monitoring reports should be required for the life of the project.</p> <p>The TAC should ensure that no Palouse prairie habitat is harmed by operation of the wind farm. Ongoing monitoring of Palouse Prairie health should be performed.</p> <p>Follow-up studies performed under the oversight of the TAC need to be satisfactory. The avian surveys should be conducted monthly over a minimum of two years and include nighttime data during migration periods. The flora should be surveyed every month during the growing season from the beginning of March to the end of September for a minimum of two years.</p> <p>'The wind farm operator should issue these reports to the TAC</p>	Please refer to the response to Comment 58 (KIE-21), and Comment 306 (KAR-A-42). Palouse Wind has voluntarily agreed to form a Technical Advisory Committee (TAC). The responsibilities of the TAC will be established in coordination with Whitman County.	No change to the text required.

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					<p>at least every six months for the first two years of operation and every year thereafter. The TAC should meet every six months for the first two years of project operation. The TAC should include an educational component to allow and encourage Palouse Wind to promote green energy and a research component to permit further technical wind energy studies on that site.</p> <p>A Technical Advisory Committee as a site certification requirement for each commercial wind energy project is a recommendation made by the federal Wind Turbine Advisory Committee, the U. S. Fish and Wildlife Service, the Washington Energy Facilities Site Evaluation Council, and the Washington Department of Fish and Wildlife.</p> <p>The TAC is an important tool for Palouse Wind, Whitman County administration, other involved agencies, and the public to be able to address unforeseen, excessive and/or unplanned effects on the environment by the wind farm. It is logical and necessary that adjustments be made if unanticipated impacts become apparent from monitoring data. There must be a process in place to do so.' [Assessment of Palouse Wind Project, Karl and Associates; Pullman, WA, February 20, 2011]</p> <p>'We are particularly pleased that the interagency group of experts on wildlife biology (IWETT) and Technical Steering Committee are actively engaged as advisors on this project since wind power technology and configuration of wind turbines in this area are still relatively new. Effective adaptive management will be important to minimize and mitigate impacts.' [Cotteral Wind Power Project, September 22, 2005, comment letter EPA to BLM]</p> <p>'EPA supports project strategies that include monitoring, which is a necessary and crucial element in identifying and understanding the consequences of actions. The proposed project could be designed to include an effective feedback element, including implementation and effectiveness monitoring. Since wind power technology and configuration of wind turbines in this area are relatively new, effective adaptive management would also be important to minimize and mitigate impacts.' [EPA Detailed Scoping Comments on China Mountain Wind Power Project, EPA to BLM]</p> <p>'Because wind power technology and configuration of wind turbines in the project area are still relatively new, and their impacts on birds and bats within forested areas remain unclear, effective adaptive management will be important to reduce and mitigate the project impacts.' [Whistling Ridge Energy Project, July 16, 2010 letter EPA to BPA]"</p>		

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<b>393</b> <b>PWC-A-1</b>	Water Use	Water Resources	David Hall, board member Palouse Water Conservation Network Moscow, ID 83843-3002	March 14, 2011	“The Grande Ronde aquifer system—our source of water on the Palouse—is a non-renewing resource of very high quality water. Water levels in the Grande Ronde aquifer are dropping about one foot per year. The water we’re consuming most likely seeped into the Grande Ronde basalts during the last ice age, when the Palouse was covered with water. It is 10,000-20,000 years old, pristine as well as irreplaceable. Soil research shows that little precipitation is able to penetrate to the basalt layers from which we draw our water. .... Once our groundwater is gone, it will never be restored (at least not on a human time scale).”	Please refer to the responses to Comment 370 (HAL-A-1), Comment 371 (HAL-A-2), Comment 378 (PPF-A2- 6), Comment 379 (PPF-A2-7), and Comment 381 (PPF-A2-9).	No change to the text required.
<b>394</b> <b>PWC-A-2</b>	Water Use	Water Resources	David Hall, board member Palouse Water Conservation Network Moscow, ID 83843-3002	March 14, 2011	“The DEIS Addendum Table 3.7-1, “Summary of Potential Energy and Natural Resources Requirement,” indicates that the total maximum water consumption during construction would be 13 million gallons – up to 11,700,000 gallons for dust suppression and up to 536,400 gallons for cement – for the life of the project, for the 65-turbine layout. Water consumption for operations and maintenance are to be less than 5,000 [gallons] per day—or 1,825,000 gallons per year.  Are there better options for dust abatement and creating concrete than using 13 million gallons of our drinking water? Using a conservative 100 gallons of water per person per day, the amount of water used during construction would serve the needs of 130,000 people for a day – or 356 people for a year. And the daily operations and maintenance water budget would supply 50 people for a day.”	Please refer to the responses to Comment 370 (HAL-A-1), Comment 371 (HAL-A-2), Comment 378 (PPF-A2- 6), Comment 379 (PPF-A2-7), and Comment 381 (PPF-A2-9).	No change to the text required.
<b>395</b> <b>PWC-A-3</b>	Water Use	Water Resources	David Hall, board member Palouse Water Conservation Network Moscow, ID 83843-3002	March 14, 2011	“The DEIS says that the impact on water resources is insignificant. But water use adds up – this is especially important when it is taken from a high-quality declining non-renewable water source such as the Grande Ronde aquifer.  Will Grande Ronde aquifer water be used? Or will it be water from shallower wells? Or perhaps surface water?”	Please refer to the response to Comment 370 (HAL-A-1).	No change to the text required.
<b>396</b> <b>PWC-A-4</b>	Water Use	Water Resources	David Hall, board member Palouse Water Conservation Network Moscow, ID 83843-3002	March 14, 2011	“The sources of the water need to be specified in the final EIS. Non-drinking-quality water (surface water) should be used, and alternatives should be considered to reduce the amount of water used. This reduction in water use is important both to minimize resources used (primarily our valuable water itself, and secondarily the resource costs of hauling and applying the water), and to reduce the amount that the landscape is altered hydrologically.”	Please refer to the responses to Comment 370 (HAL-A-1), Comment 371 (HAL-A-2), Comment 378 (PPF-A2- 6), Comment 379 (PPF-A2-7), and Comment 381 (PPF-A2-9).	No change to the text required.

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<b>397</b> <b>PAS-A-1</b>	Directives from WDFW	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	“During a meeting on March 7, 2011, with Alan Thomson, Whitman County Planner, we were assured that First Wind has been working directly with Michael Ritter of Washington Department of Fish and Wildlife and are in full compliance with their directives concerning avian and bat studies. We have not been able to learn what his directives have been, other than the written reply regarding the DEIS in December. From those comments and those contained in the Addendum we do not understand how the minimum requirements for avian and bat studies have been fulfilled. Granted that WFWD comments are likely regarded as more critical than those of a private citizen or organization, we none-the-less feel that our concerns should be considered.”	Comment noted. WDFW has developed its <i>Wind Power Guidelines</i> (2009) collaboratively through a representative stakeholder group comprised of environmental representatives, county planners, wind energy developers, State and federal natural resource managers and biologists, and the public with consideration for fish and wildlife habitat protection, conservation and mitigation related to the development of wind energy facilities. These guidelines are intended to provide permitting agencies and wind project developers with an overview of the considerations that are made by WDFW in the review of wind energy project proposals.  The WDFW <i>Wind Power Guidelines</i> , available at <a href="http://wdfw.wa.gov/publications/pub.php?id=00294">http://wdfw.wa.gov/publications/pub.php?id=00294</a> , provides consistent statewide guidance for the development of land-based wind energy projects that avoid, minimize, and mitigate impacts to fish and wildlife habitats in Washington State. Palouse Wind is actively coordinating with WDFW regarding the Proposed Action, and will ensure that the Proposed Action is consistent with the WDFW <i>Wind Power Guidelines</i> .  Additionally, please refer to the response to Comment 45 (KIE-8).	No change to the text required.
<b>398</b> <b>PAS-A-2</b>	Additional Avian Surveys in Steam Shovel Hill Area	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	“The Steam Shovel avian plot (survey site F) addressed in the DEIS contained only two seasons of data (spring and summer). The Addendum suggests that additional winter avian studies have been completed at all of the original sites (5) plus at three additional sites (one of which is west of survey site F). The wording in the Addendum (3.3 Wildlife, p. 10) leaves some question whether that is indeed what took place. It is also unclear if a full year of avian studies at the Steam Shovel site or sites will be completed. In particular, we feel that fall raptor migration and use are extremely important at the Steam Shovel location.”	Avian point counts were conducted during the period of January through March 2011 in the Plots labeled G through I, as indicated in Figure 3.3-1 of the DEIS Addendum, and in the Plots labeled B, through F, as shown on Figure 4, in DEIS Appendix C.  Avian point counts at Plots G through I will continue through the Summer/Fall of 2011.	Section 3.3 of the DEIS Addendum (page 10, paragraph 1) will include the following text:  <i>Figure 3.3-1 illustrates the locations of the three additional avian use point plots for these areas. Plot G is located approximately 1 mile west of Steam Shovel Hill, Plot H is located just west of Naff Ridge, and Plot I is located near the western edge of the Proposed Action boundary near Maley Road.</i>
<b>399</b> <b>PAS-A-3</b>	Need for Additional Raptor Surveys	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	“In the DEIS, spring data at survey site F showed nearly three times the raptor use of any other site. No explanation is given for the increase of raptor use of this area in spring; however, it is likely that the increase is related to migration and the closer location of this site to Steptoe Butte. Steptoe Butte State Park is an active raptor area in all seasons of the year. Because much of the butte is composed of Palouse Prairie, the habitat brings in many raptors: Red-tailed Hawks, Northern Harriers, and American Kestrels nest on the butte and are commonly seen in spring, summer, and fall; Golden Eagle, Northern Goshawk, Harlan’s Hawks, and Rough-legged Hawks are observed in winter; Great Horned Owls and Long-eared Owls nest on the butte; Short-eared Owls hunt the fields surrounding the butte; Snowy Owls frequent the area in winter; Sharp-skinned Hawks, Cooper’s Hawks, Osprey, and Turkey Vultures have been seen in migration; American Crows and Common Ravens are often observed. Swainson’s Hawks have also been observed. We believe fall data will show the same or even greater use than the spring data revealed. It is not uncommon for kettles of 50 plus Swainson’s Hawks to be observed over Pullman during late August and early September evenings. These birds in migration are obviously using the corridor over Steptoe and Kamiak Buttes (and thus likely Steam Shovel Hill).”	Please refer to the response to Comment 200 (PAS-6).	No change to the text required.

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Comment Number	Issues Raised	EIS Category	Commenter	Date Comment Received	Comments	Response to Comment	Documents and Pages in which Comment is Addressed
<b>400</b> <b>PAS-A-4</b>	Avian Migratory Routes through Steptoe Butte	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	"The proximity of Steam Shovel Hill to Steptoe Butte is troubling, not only for the aesthetic degradation of the view but also for the avian use of the butte during migration. Although avian migratory routes have not been precisely identified, we strongly feel that Steptoe and Kamiak Buttes serve as a major land mass during migration. This is evident by observations at Steptoe Butte and by bird surveys conducted at Mann Lake in North Lewiston, Idaho. Mann Lake lies due south of the two buttes and has some of the highest and most diverse migratory species counts east of the Walla Walla delta. The mortality of avian species in the Steam Shovel vicinity is expected to be far greater than any of the remaining areas."	Please refer to the response to Comment 200 (PAS-6). The Proposed Action area does not have the same type of habitat as that found at Mann Lake, nor the same attractiveness for a number of species that may use the lake. Avian use surveys documented low use by waterfowl and waterbirds, which would be expected to frequent Mann Lake. Development of the Proposed Action is not expected to affect wildlife use at Mann Lake, which is located more than 50 miles southeast of the proposed Facility.	No change to the text required.
<b>401</b> <b>PAS-A-5</b>	Increased Mortality of Great Horned Owls	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	"We are further puzzled that the raptor nest survey does not include information on the location of nests of Great Horned Owls. Great Horned Owls occupy the same habitat as Red-tailed Hawks, hunting by night in the same areas that Red-tailed Hawks hunt by day. Owls do not build their own nests but use nests built by Red-tailed Hawks when they begin nesting in the winter. When the Red-tailed Hawks begin their breeding period in spring, these nests are not available to them, so they either build another nest or use an unoccupied one. The raptor nest survey done in May should have located these owl nests, as the young are still in the nest in mid-May. Because the nest survey was done in one day, and only near the end of the baseline studies, it is not known whether this is another example of incomplete data. Palouse Audubon Society strongly recommends that additional nest surveys be completed on the ground to ensure completeness and a one day event will not identify every raptor nest.  Of great concern is the fact that owls are totally missing from the avian studies data. As stated above, Great Horned Owls are present but their nests were undocumented. Depending on the winter, Snowy Owls are present; Long-eared Owls nest in old Black-billed Magpie nests found in brushy areas; Barn Owls nest in vacant farm buildings; and Short-eared Owls occupy the area during the fall and winter and are known to nest in CRP (personal observation)."	Please refer to the responses to Comment 45 (KIE-8), Comment 46 (KIE-9), Comment 48 (KIE-11), and Comment 198 (PAS-4).	No change to the text required.
<b>402</b> <b>PAS-A-6</b>	Requirement for Full Year of Avian Surveys	Wildlife	Thomas L. Weber President Palouse Audubon Society Pullman WA 99163	March 14, 2011	"As stated earlier, we have been informed that First Wind is in total compliance with the directives of WDFW. We feel, however, that they have NOT fulfilled those guidelines. Washington Department of Fish and Wildlife Wind Power Guidelines (April, 2009) recommend a minimum of one full year of avian surveys, with two or more years of data recommended when there is limited or no relevant data regarding seasonal use of the project site. Since there is no relevant data in the area being considered, why hasn't First Wind been required to fulfill the recommended two or more years of data? Avian surveys are sadly lacking in eastern Washington, especially in Whitman County. Our request for information on hawk migration in eastern Washington to Hawkwatch International, which maintains raptor survey sites throughout the United States and in the Cascade Mountains, on Chelan Ridge, resulted in this reply: "We have done satellite telemetry studies across several of our migration monitoring sites with Golden Eagles and Red-tailed Hawks to follow them more closely. Based on our results, birds are at least in the vicinity of the Pullman/Steptoe Butte area, but the scale of our work is not	Please refer to the responses to Comment 45 (KIE-8), Comment 46 (KIE-9), Comment 48 (KIE-11), Comment 196 (PAS-2), and Comment 198 (PAS-4).  The FEIS authors contacted HawkWatch International to request information on raptor migration studies in the Proposed Action area and environs. The nearest monitoring and trapping site used by HawkWatch is at Chelan Ridge, located approximately 140 miles west of the Proposed Action area. HawkWatch has done some limited satellite telemetry research of hawks in the area. There is some use of the general area by raptors with telemetry transmitters, but, there is no indication that there is significant raptor use of the Proposed Action and environs (Markus Mika, pers. comm. 2011). The results of the research are inconclusive due to the limited amount of data collected and the low intervals of telemetry data transmission (Markus Mika, pers. comm. 2011).  Avian use point counts were conducted in the Proposed Action area in the period of 2008-2011 (see DEIS Appendix C, <i>Ecological Baseline Studies and Wildlife Impact Assessment</i>	Section 3.3.3.5 of the DEIS (page 3-33) will be revised as follows:  <i>The Bald and Golden Eagle Protection Act of 1940 prohibits the taking or possessing of and commerce in bald and golden eagles, with limited exceptions (16 U.S.C. 668-668d, June 8, 1940, as amended 1959, 1962, 1972, and 1978). The Act only covers intentional acts or acts in "wanton disregard" of the safety of bald or golden eagles.</i>  <i>No bald or golden eagles or their nests were documented in the Proposed Action area. <u>A single golden eagle sighting occurred during the surveys, although no active or inactive nests were observed within a 2-mile buffer of the Proposed Action boundary.</u></i>  Additionally, the following paragraphs will be added the DEIS Section 3.3.4.2 "Operation Impact", in the subsection on Raptors (page 3-39):  <i>In Washington, golden eagles nest throughout much of the</i>

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					<p>detailed enough to draw clear conclusions on the use of the proposed wind farm corridor by raptors. Considering the evidence of a decline in numbers for Golden Eagle populations in western North America, observed in part by our monitoring on migration routes, more specific efforts at a local scale are necessary to determine the impact of wind power generation on raptors. HWI has done raptor surveys at a local scale, but not in eastern Washington.” (Markus Mika, Hawkwatch International, personal communication.) Other resources that were contacted just said: There is no raptor migration data for eastern Washington.</p> <p>In summary, we feel that:</p> <ol style="list-style-type: none"> <li>1. Avian studies do not always meet even the minimums recommended in the guidelines established by the WDFW, for example, there should have been a minimum of two years of data collection in an area with no prior data</li> <li>2. There is no indication in the Addendum that even a complete year of avian studies will be conducted at Steam Shovel Hill, resulting in no data for fall raptor and passerine migration</li> <li>3. A one-day helicopter raptor nest survey failed to identify any Great Horned Owl nests, indicating that either multiple helicopter surveys or a detailed ground survey should be conducted</li> <li>4. The incompleteness of the avian survey becomes obvious when not one owl species has been noted during the surveys”</li> </ol>	<p>for <i>Palouse Wind, Whitman County, Washington</i> [NWC, 2010], and FEIS Appendix, <i>Preliminary Summary of Winter 2011 Avian Point Counts</i> [NWC, 2011]). A raptor nest survey was also conducted in May 2009. These surveys resulted in a single golden eagle sighting and no identification of active or inactive eagle nests within the Proposed Action area and a 2-mile buffer.</p>	<p><u>state, but are most common in the north-central highland transitional area between montane and shrub-steppe habitats (WDFW, 2004). Scattered golden eagle nest sites are found in more arid portions of eastern Washington and west of the Cascades, where the species is uncommon (WDFW, 2004).</u></p> <p><u>A golden eagle fatality has been documented in the CPE near Goodnoe Hills in Washington (URS, 2010). Three golden eagles have been recently determined as fatalities at the Elkhorn Valley facility in Union County, Oregon (Rautenstrauch, 2010), which is not within the CPE. The Proposed Action area lacks habitat and topographic features, like large canyons and open shrub steppe habitat, that might have attracted golden eagles to Goodnoe Hills and Elkhorn Valley.</u></p> <p><u>The Proposed Action area is located in a region where most of the native habitat has been converted to agricultural cropland. The result is low prey availability for the golden eagle. In addition, there are few nesting opportunities in the Proposed Action area. Specifically, there is none of the species’ preferred cliff nesting habitat and few trees that could support an eagle nest.</u></p> <p><u>Based on the lack of suitable nesting, limited foraging habitat, and very low documented use of the Proposed Action area (one observation to date) and environs by the species, the risk to golden eagles from development and operation of the Facility is expected to be very low.</u></p> <p>DEIS Section 4.4 will include the following references:</p> <p><u>Mika, M. 2011. Personal communication between Markus Mika/HawkWatch International Science Director and Bridget Canty/CH2M HILL Ecologist on March 17, 2011 regarding existing hawk migration data and telemetry research in Southeastern Washington.</u></p> <p><u>Rautenstrauch, B. 2010. Wind farm forum draws 150. Article in the June 24, 2010 issue of The Observer, newspaper for Union and Wallowa Counties, Oregon. Available online at: <a href="http://www.lagrandeobserver.com/News/Local-News/Wind-farm-forum-draws-150">http://www.lagrandeobserver.com/News/Local-News/Wind-farm-forum-draws-150</a></u></p> <p><u>URS Corporation (URS). 2010. Final Goodnoe Hills Wind Project avian mortality monitoring report. Prepared for PacifiCorp, Salt Lake City, UT. Prepared by URS Corporation, Seattle, Washington.</u></p> <p><u>Washington Department of Fish and Wildlife (WDFW). 2004. Management Recommendations for Washington’s Priority Species – Volume IV: Birds. <a href="http://wdfw.wa.gov/publications/00026/wdfw00026.pdf">http://wdfw.wa.gov/publications/00026/wdfw00026.pdf</a>. Accessed on March 18, 2011.</u></p>

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<b>403</b> <b>SKI-A-1</b>	Protection of the Palouse Prairie	Vegetation	David M. Skinner Moscow, ID 83843	March 14, 2011	<p>"Palouse Prairie once covered most of Whitman County but is rare. Because the environmental conditions that formed the Palouse Prairie are the same ones that made it some of the most productive agricultural land in the world, over 99% of the prairie has been converted to agricultural and other uses and Palouse Prairie is one of the rarest ecosystems in the world. One that basis alone the few small and widely scattered remnants that remain should be protected from further harm. They provide habitat for many species including beneficial soil microbes, pollinators and other beneficial insects, birds and small mammals, and large animals.</p> <p>No Palouse Prairie should be damaged in any way either during the construction or during operation of the wind facility. No towers, roads, transmission lines, or any other parts of the facility should be placed where they will damage Palouse Prairie remnants on the site. The Washington Department of Fish and Wildlife (WDFW) considers Palouse Prairie to be among the most endangered ecosystems in the U.S. and endorses its preservation. The Environmental Protection Agency (Region 10), The Nature Conservancy, the Palouse Land Trust, and the Palouse Prairie Foundation all support preservation of the small amount of Palouse Prairie that remains."</p>	Please refer to the response to Comment 147 (HAL-2).	Please refer to the revisions based on the response to Comment 147 (HAL-2).
<b>404</b> <b>SKI-A-2</b>	Avoiding and Mitigating Damager to Palouse Prairie	Vegetation	David M. Skinner Moscow, ID 83843	March 14, 2011	<p>"Restoration efforts thus far have been able to recreate only rough approximations of the original Palouse Prairie. To do more will take a tremendous amount of time, energy, dedication, and resources. Some of the parts (especially soil organisms) may be missing and we may never know what they were. This makes the existing remnants very valuable, as it is far easier and less expensive to preserve them than to restore them. Damaged prairie cannot simply be repaired by seeding 'native grasses' as is suggested in the DEIS. The mitigation suggested in the DEIS is totally inadequate and inappropriate. Digging up plants and setting them aside for later replanting will not re-create, preserve or mitigate for any damage caused by construction. The plants are part of an ecosystem and must be considered as a whole. The only way to protect the ecosystem is to avoid it during siting, construction, and operation. If damage cannot be avoided, the company should purchase other good quality remnant land, either on or off site, and place it in a land trust to protect it in perpetuity."</p>	Please refer to the responses to Comment 87 (WNPS-2) and Comment 228 (SKI-2)	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>405</b> <b>SKI-A-3</b>	Rare Plant Surveys	Vegetation	David M. Skinner Moscow, ID 83843	March 14, 2011	<p>"Presence or absence of rare plants should not be the determining factor in whether a prairie remnant is valuable. Because of the rarity of the ecosystem, all of the remnants are valuable, whether or not they contain rare plants. Rare plants also may not be restricted to high quality Palouse Prairie remnants. Degraded areas should be surveyed for rare plants and any populations thereof should be protected from activity during construction and operation."</p>	Please refer to the response to Comment 229 (SKI-3)	No change to the text required.

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<b>406</b> <b>SKI-A-4</b>	Need for Additional, More Thorough Rare Plant Surveys	Vegetation	David M. Skinner Moscow, ID 83843	March 14, 2011	"The sampling procedure for the rare plant survey is inadequate. The surveys were conducted over a short time period late in the summer. Many of the native Palouse Prairie plants are adapted to the dry summers of the Palouse and are dormant by that time. Dormant plants are very difficult to locate. Additionally, some plants, including the threatened Spalding's catchfly ( <i>Silene spaldingii</i> ), are known to exhibit prolonged dormancy and may not appear above ground every year or may only produce a few leaves and then senesce long before flowering individuals of the species. For these reasons, the rare plant surveys need to be repeated earlier in the season with closer and more detailed inspections of potential habitat. The sampling procedures for the Steam Shovel Expansion Area are even more inadequate."	Please refer to the response to Comment 209 (PPF-6).	No change to the text required.
<b>407</b> <b>SKI-A-5</b>	Need for Additional Avian Studies	Wildlife	David M. Skinner Moscow, ID 83843	March 14, 2011	"Avian studies are inadequate and were not conducted over the entire project area nor with enough frequency to adequately access bird uses and migration patterns. In particular raptor use in the Steam Shovel Expansion Area is much greater than in other parts of the proposed project area and requires more accurate surveying before towers can be properly sited.  Avian studies need to be conducted on-site, and not extrapolated from other areas. The Palouse Prairie is a unique ecosystem which exists nowhere else in the world. Studies need to be conducted on-site to capture that unique quality."	Please refer to the responses to Comment 168 (HOC-9), Comment 200 (PAS-6), and Comment 354 (VOG-A-1).	No change to the text required.
<b>408</b> <b>KEA-A-1</b>	Economic Benefit	Socioeconomics	Andy Keats Back 40 Media	March 15, 2011 (Note: received after the DEIS Addendum comment period ended)	"I am a professional photographer who spends a significant amount of time in the Palouse. As a native of Southeast Washington I have grown up and built my career around the landscape that I know. The property in Pomeroy where I grew up is being developed with wind turbines, I am excited for the economic opportunity that these turbines are going to bring to my family and the community,"	Comment noted	No change to the text required.
<b>409</b> <b>KEA-A-2</b>	Tourism	Socioeconomics	Andy Keats Back 40 Media	March 15, 2011 (Note: received after the DEIS Addendum comment period ended)	"One aspect in particular that I am excited for is the opportunity to photograph these magnificent machines in the rolling hills of the Palouse. Building these turbines will develop a thriving tourism industry in Whitman County. Photographers will come from around the western United States to take pictures of these innovations of modern technology. I appreciate the opportunity to show my support for the Palouse Wind project."	Comment noted	No change to the text required.
<b>410</b> <b>KEA-A-3</b>	Tax Revenue	Socioeconomics	Andy Keats Back 40 Media	March 15, 2011 (Note: received after the DEIS Addendum comment period ended)	"According to my research, in addition to the development of an exciting tourism industry, the Palouse Wind project will generate substantial tax revenue for the County. I've driven most of Whitman County and I have noticed that towns, schools, infrastructure, and services don't seem to be what they used to be. I realize that a lot of this must be because of the ebbs and flows of the agriculture industry. Why not promote a source of revenue that is not dependent on crop prices that can fluctuate with climate, natural disaster, or world politics?"	Comment noted	No change to the text required.

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<b>411</b> <b>KEA-A-4</b>	Supports Project	General	Andy Keats Back 40 Media	March 15, 2011  (Note: received after the DEIS Addendum comment period ended)	"I realize that some people in Whitman County may not like the appearance of the turbines, I simply want to produce the other side of the issue, I feel like the minority voice in the region is louder than the voices of the people that actually care about our rural communities, There are many residents in Eastern Washington that want to be hosts to companies like First Wind in our communities, We want positive change, We want clean, home-grown energy, And we want to diversify the industries upon which our community tax structure depends on, I urge you to do everything possible to expedite the processing of the Palouse Wind conditional use permit."	Comment noted	No change to the text required.
<b>412</b> <b>WDFW-A-1</b>	WDFW Involvement	General	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	March 18, 2011  (Note: received after the DEIS Addendum comment period ended)	"WDFW would like to point out that we have been involved with Whitman County and the developer, First Wind, since the inception of this project. We value the collaboration with both the county and the developer, and the voluntary utilization of the WDFW Wind Power Guidelines by the developer. Additionally, the developer has demonstrated a willingness to hear and act on the concerns of WDFW related to raptor surveys and conservation of Palouse Prairie."	Comment noted	No change to the text required.
<b>412</b> <b>WDFW-A-2</b>	Avian Point Counts	Wildlife	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	March 18, 2011  (Note: received after the DEIS Addendum comment period ended)	"The DEIS Addendum is consistent with most of the information presented in the DEIS but there are differences that WDFW feels require additional information and clarification. In the Addendum, Section 3.3, Wildlife, it states that:  'In addition to the avian point counts described in the November 2010 DEIS.... Palouse Wind has re-initiated point counts (at existing locations...) to add additional characterization of the winter use of the entire Proposed Action area (as revised) from January through March 2011, and to collect additional data regarding avian use of the areas west of Naff Ridge and the western section of Steam Shovel Hill.'  Does the re-initiation of point counts mean that there will be more than one year of data regarding avian use of the proposed site for Avian Use Study Plots A-F? What about the new Avian Use Study Plots G-I? Will these just have winter surveys? Additional clarification would be useful to better understand the avian use of the site and potential impacts."	Please refer to the responses to Comment 48 (KIE-11) and 398 (PAS-A-2).	Please refer to the revisions based on the responses to Comment 48 (KIE-11) and 398 (PAS-A-2).
<b>412</b> <b>WDFW-A-3</b>	Bat Data	Wildlife	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	March 18, 2011  (Note: received after the DEIS Addendum comment period ended)	"In conjunction with the re-initiated and new avian point counts, it would be useful to have additional bat data from this site. Considering the original bat data and analysis was from one site in the project area in 2008, additional data from at least the Steam Shovel Expansion Area would be useful to compare with the original data and further refine species composition and potential impacts."	Palouse Wind will continue to coordinate with WDFW to determine the appropriate level of bat survey needed at Steam Shovel Hill to refine original data collected with respect to species present and potential impacts.	No change to the text required.
<b>412</b> <b>WDFW-A-4</b>	Palouse Prairie	Vegetation	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	March 18, 2011  (Note: received after the DEIS Addendum comment period ended)	"WDFW understands that the 65-turbine layout as depicted in the DEIS Addendum is the "worst-case scenario." However, more turbines typically equates to more impacts related to turbine pad sites. In this "worst-case scenario," it would seem that more pad sites would reduce our ability to collaboratively micro-site turbines to reduce or eliminate impacts to Palouse Prairie."	Please refer to the responses to Comment 87 (WNPS-2), Comment 368 (KIE-A-9), and Comment 147 (HAL-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

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<b>412</b> <b>WDFW-A-5</b>	Palouse Prairie	Vegetation	Michael Ritter Washington Department of Fish and Wildlife Pasco, WA 99301	March 18, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"We would like to reiterate the comments from our December 2010 letter to Whitman County on the DEIS, particularly the last sentence.</p> <p>'...temporary and permanent impacts are likely to occur to native perennial grasslands in both the Proposed Action Area and Steam Shovel Action Area. While these impacts total approximately 3% of those anticipated, they will impact a unique habitat type that is important to native and migratory bird and mammal species that are dependent on these grassland habitats. The avian use surveys detected the presence of grasshopper sparrows and savannah sparrows in the project area. In our December 6th meeting with representatives from First Wind, we expressed our concerns regarding this habitat type as it represents remnants of the once vast Palouse Prairie. This fact alone makes these habitat areas all the more valuable to species. We are only beginning to attempt restoration of these sensitive habitats and at are not confident in our ability to successfully do so. It is our concern that temporary impacts will represent permanent impacts in these types of sensitive native habitats. In the recent meeting we discussed collaborative micro-siting as a means to eliminate any impacts to these areas and we look forward to these discussions and field visits. At this point in time, WDFW recommends that there be no impacts to native perennial grasslands (Palouse Prairie)."</p>	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).
<b>413</b> <b>WAG-A-1</b>	Setbacks	Land Use	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"The proximity of the wind turbine to existing residences and buildings of my own and my neighbors: Setback Requirements as stated in First Wind's initial proposal states: "All setback distances established in this section shall be measured from the closest point of the tower to the closest point of the thing from which the tower is set back, for example, an occupied building or property line ... for all non-consenting, non-participating land owners, commercial wind energy turbine towers shall be setback a minimum distance of four -times (4x) the maximum height of the turbine, measured to the blade tip at its maximum elevation, from the non-participating landowner's occupied building". Since the letter of February 24th states that "as the owner of property located within 1500 feet of the site of a conditional use request, you are being notified of the following;" .... it is clear my farm is 1500 feet or less from the boundary. Therefore, per the dimensions in the initial proposal, the maximum height of the wind tower plus the turbine is equal to 492 feet x 4 which equals 1968 feet. If the tower were laid down, clearly it could reach the boundaries of my farm (and several of my neighbors on Oakesdale Road)."</p>	The setback requirement contained in WCC 19.61.060(1)(b) relates to the distance between wind turbine generators (turbines) and occupied buildings. As shown on Figure 1-2 of the DEIS Addendum, the proposed turbine locations are also setback a substantial distance from the Proposed Action boundary. As stated in the DEIS, the Proposed Action will comply with all setback standards contained in WCC 19.61.060(1)(b). (Note that Whitman County has provided more notice than its code requires.)	No change to text required.
<b>414</b> <b>WAG-A-2</b>	Facility Siting	General	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"There is no discussion of the precise planned location of wind turbines associated with the Steam Shovel Expansion. This "micro-siting" aspect of the Steam Shovel Expansion is critical given the number of residences, children, farm buildings, livestock and other animals in very-close proximity to wind turbine site."</p>	Please refer to the response to Comment 87 (WNPS-2).	Please refer to the revisions based on the response to Comment 87 (WNPS-2).

**TABLE 1-1**  
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 Palouse Wind LLC, Whitman County, Washington

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<b>415</b> <b>WAG-A-3</b>	Visual Impacts	Visual	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"I have lived on the property addressed in your letters all of my life and reside in the same farm house which was built in 1888 on this property. My parents bought this farm in 1940 and I currently own the land. My neighbors, similarly, are long-time Whitman County ancestors who have lived in a landscape virtually unchanged for generations since the first pioneers settled here. My neighbors and I on the Oakesdale Road, our children, horses, cattle and other farm animals, will be able to see and hear these turbines. Oakesdale Road runs between Rosalia, including the Rosalia Battlefield State Park, and is in a direct sightline from Steptoe Butte State Park with many tourists using this route as they visit these State Parks and travel the Palouse Scenic By-Ways . All of my farm land is in the Conservation Reserve Program (CRP), and thus is planted with native prairie grass. This return of land to a natural, undeveloped state is anathema to the installation of nearly 500 feet [sic] wind turbines, associated noise of the turbines, and the industrialized landscape that will be created by First Wind during its construction. The visual impact of the wind turbines from Steptoe Butte, my home, and tourists who travel through the area will be hampered by these turbines. Oakesdale Road travels east to west from Oakesdale to Highway 195 and local residents, visitors, and tourists will virtually pass right by these wind turbines placed on Steam Shovel Ridge."</p>	<p>Comment noted. Sections 3.9 and 3.15 of the DEIS and the DEIS Addendum identify potential impacts and provide analysis regarding visual and noise resources respectively.</p> <p>Additionally, please refer to the responses to Comment 329 KAR-A-64 and Comment 246 (VOG-3).</p>	Please refer to the revisions based on the response to Comment 246 (VOG-3).
<b>416</b> <b>WAG-A-4</b>	Wildlife Impacts	Wildlife	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"As I have stated above, I placed my farm into CRP seven years ago and have three more years left on a ten year contract. Therefore, I now have moose, deer, pheasant, coyotes, huns, red tailed hawks, horned owls, snow owls, and other wildlife that simply were not around or by the farm prior to CRP. Obviously, I have concerns on the negative impact the wind turbines would have on the existing wildlife, particularly on the beautiful owls that have finally returned in larger numbers with the introduction of CRP. As an owner of farm land I have tried to be a good "steward" of the land and I am proud of the CRP, the lack of erosion, the increase in wildlife, and the aesthetics of the land as it has been brought back to it's [sic] original state of native grasses. The grasses wave in the wind as I ride my horse over the hills and I can not [sic] even imagine looking across those hills to only see wind turbines on the next ridge."</p>	Please refer to the response to Comment 53 (KIE-16).	Please refer to the revisions based on the response to Comment 53 (KIE-16).

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<b>417</b> <b>WAG-A-5</b>	Socioeconomic Impacts	Socioeconomic	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	<p>"In Table ES-3 of the initial Application for Conditional Use Permit ("CUP"), it is indicated that no mitigation measures are planned for this project because all impacts are deemed to be beneficial. The Addendum DEIS associated with the Steam Shovel Expansion notes only that the County will gain increased tax revenues. These conclusory statements demonstrate a complete lack of meaningful analysis of the socioeconomic impacts of this project. The neighboring land owners are all served by Inland Power &amp; Light (IPL). Just last month the CEO of Power &amp; Light stated the following:</p> <p>'We are building wind energy out there not because we need new sources of electricity, but to meet renewable energy standards ..... [people] haven't made the connection between the costs of renewable energy and the effect it is going to have on their electric bill. Having to buy higher cost electricity we don't need is very difficult to understand.'</p> <p>In this regard, it is not clear to me where the power and the renewable benefits associated with this project are going. Has the County investigated this issue? My understanding is that many wind projects are developed in the Pacific Northwest in order for their power and their renewable attributes to be "exported" to California or other places where regulators have imposed strict renewable portfolio standards on their local utilities. Why would the County want to encourage a wind farm development if it hasn't even determined whether the environmental benefits will stay here ... or will be exported to Western Washington, Oregon or California?"</p>	Whitman County does not regulate purchase and sale of electricity. Once delivered to the regional electrical transmission system, the power generated by the Proposed Action will be used where demand exists.	No change to text required.
<b>418</b> <b>WAG-A-6</b>	Socioeconomic Impacts	Socioeconomic	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	"It is also unfair for the County to disregard completely the socioeconomic impacts on neighboring, nonparticipating landowners. Having the shadows of wind towers within 1500 feet of our historic farms and buildings can only be expected to have a negative impact on the values of our homes. This impact is not addressed at all in the Draft EIS associated with the Steam Shovel Expansion."	Please refer to the responses to Comment 132 (GIB-12), Comment 137 (GIB-17), and Comment 138 (GIB-18).	Please refer to the revisions based on the responses to Comment 132 (GIB-12), and Comment 138 (GIB-18).
<b>419</b> <b>WAG-A-7</b>	Socioeconomic Impacts	Socioeconomic	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	"To the extent the County is considering socioeconomic impacts associated with this project, including the Steam Shovel Expansion, the County should consider the following: (1) whether the renewable benefits associated with the wind energy produced go to the benefit of local Whitman County residents, or be exported to utilities serving the West side of the State, Oregon, or California?; (2) whether wind energy will have an adverse economic impact by increasing County residents' electricity bills; (3) whether the installation of massive turbines in a scenic, historic farming area that is currently undeveloped by any such massive industrial installations will lower neighboring residents' property values. These assessments are critical before the County can make any credible determination that mitigation of socioeconomic impacts is not needed."	Please refer to the response to Comment 417 (WAG-A-5). Development of a commercial wind generating facility is allowed under the Whitman County Zoning Code as a conditional use.	No change to text required.
<b>420</b> <b>WAG-A-8</b>	Blasting	Geological and Soil Resources	Marcia Wagner Oakesdale, WA 99158	March 23, 2011 (Note: received after the DEIS Addendum comment period ended)	"Blasting: This is also an area of grave concern due to the proximity of Steam Shovel Ridge to my property line as well as to my farm house, buildings, and animals. The blasting/excavation would be very disrupting and I fear that children and farm animals in the area could become alarmed, anxious or otherwise disturbed with potential injuries due to sudden blasting activity."	As stated in the Fact Sheets included in the DEIS and this FEIS, Palouse Wind will apply for a Blasting Permit from Whitman County Public Works and will adhere to the conditions and limitations of that permit. Blasting mitigation measures are addressed in Table ES-3, Summary of Impacts and Proposed Mitigation Measures for the Palouse Wind Project, under Geological and Soil Resources.	No change to text required.

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<b>421</b> <b>WAG-A-9</b>	Abandoned Mine	General	Marcia Wagner Oakesdale, WA 99158	March 23, 2011  (Note: received after the DEIS Addendum comment period ended)	“Historically, I recall that in the 1950s, neighbor children climbed Steam Shovel Ridge where they used to have an active mine, found some dynamite caps and blew off several fingers . I did not see any evaluation in the draft Addendum to the Draft EIS suggesting there has been any study of potential environmental hazards associated with disturbances to this old mine area. This highlights the cursory review given to the environmental analysis associated with the Steam Shovel Expansion.”	As stated in Table ES-3 of the FEIS, Palouse Wind will conduct a Phase 1 Environmental Site Assessment (ESA) to identify critical hazards within areas of potential development. A previous mining use would be indentified during this ESA and if so, that location would be avoided.	No change to text required.
<b>422</b> <b>WAG-A-10</b>	Notice	General	Marcia Wagner Oakesdale, WA 99158	March 23, 2011  (Note: received after the DEIS Addendum comment period ended)	“In conclusion, I would like to make it very clear I have been tentatively supportive of First Wind and the developing of renewable energy resources, to the extent that the benefits of such resources stay local, and there are no significant adverse impacts on residents. I do have major concerns, as noted above, with the Steam Shovel Expansion. I would appreciate these concerns addressed, not only to myself, but to my neighbors on Oakesdale Road who are affected by this as well. We would all appreciate more advance notification by letter of a future hearing and the ability to comment and appeal on the EIS as the process unfolds.”	Please refer to the responses to Comment 38 (KIE-1) and Comment 39 (KIE-2).	Please refer to the revisions based on the response to Comment 38 (KIE-1).

\*Because of space constraints in this matrix, the full text revisions made in response to this comment have not been included here. They can be found in full in the FEIS.

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