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January 10, 2014

Mr. Richard Davis  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101

Re: Responses to Comments from the Minnesota Department of Commerce for the Bird and Bat Conservation Strategy for the EDF Renewable Energy Stoneray Wind Project  
Burns & McDonnell Project No. 62823

Dear Mr. Davis:

Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) is providing environmental support services for the EDF Renewable Energy (EDF) proposed 105-megawatt (MW) wind energy facility, the Stoneray Wind Project (Project), to be located in Pipestone and Murray counties in southwestern Minnesota.

For the purpose of continuing coordination with the Minnesota Department of Commerce (MDC) regarding the Project, we are providing responses to the comments (dated December 16, 2013) provided by the MDC for the Project Bird and Bat Conservation Strategy (BBCS). Each comment provided by the MDC is included in the order which they were itemized by the MDC. The response is provided immediately below the comment. Several responses include reference to edited language in the BBCS. A revised version of the BBCS is included in the Enclosures.

Additionally, the responses to the Minnesota Department of Natural Resources comments are included with this letter (see enclosures). Significant portions of their comments relate to those from the MDC and language was edited in the BBCS to accommodate both agencies.

### **MDC Comments and Project Responses**

#### **MDC Comment 1:**

The use of the words voluntary and voluntarily should be removed from the BBCS document. EERA understand that the *U.S. Fish and Wildlife Service's (USFWS) Land Based Wind Energy Guidelines* are voluntary in nature. However, EERA staff would like to state that the Tier 3 wildlife studies, the BBCS, and any post-construction monitoring to be completed for the Stoneray Wind Project are not viewed as voluntary by the EERA. The studies, BBCS, and monitoring listed above are considered required to complete the environmental review of a State-issued Large Wind Energy Conversion System (LWECS) site permit. The voluntary nature of the *Land Based Wind Energy Guidelines* is limited to the Applicant's engagement with the USFWS, and should be extended to the EERA's environmental review or the Commission's LWECS site permit process.

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Response 1-A:

This edit has been made throughout the document.

Page 1-2 – Section 1.2 states that this plan is intended to meet the requirements of the Public Utilities Commission (PUC) Site Permit for an ABPP, and this section should specifically list the following elements it contains to meet that purpose:

- Steps to identify and mitigate impacts to avian and bat species during construction and operation
- Formal and incidental monitoring
- Training
- Wildlife handling, documentation, and reporting protocols
- Quarterly avian and bat reports
- Immediate Incident Reports
- Annual report and annual audit of ABPP implementation

Response 1-B:

Language in this section has been edited in this section to reference the outline these items. Details for the specifics for each item are included in Chapters 5, 6, and 7.

MDC Comment 2:

The Stoneray BBCS (November 2013) states that the *2011 Draft Eagle Conservation Plan Guidance* (USFWS 2011a) was utilized as guidance document to develop the BBCS. EERA recommends the more recent *Eagle Conservation Plan Module 1 – Land-based Wind Energy, Version 2* (USFWS April 2013) be utilized as a guidance document.

Response 2:

The suggested guidance has been reviewed and referenced within the document.

The USFWS 2011 guidance has been the primary reference for this species because the field studies and efforts for the Project were completed prior to the issuance of the 2013 USFWS guidance. Additionally, the USFWS consultations have not indicated that bald eagles are known to frequent the Project area or have nests or roosting areas within the Project. The Project does not contain any bald eagle nests and no bald eagles were observed during any of the environmental field studies completed in 2012 and 2013. Reports detailing these field studies are included as appendices to the Project's Site Permit Application for a Large Wind Energy Conversion System (LWECS), PUC Docket No. IP-6646/WS-13-216. As such, it is the opinion of EDF that Project poses low risk and should not have any adverse impacts to bald eagles.

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MDC Comment 3:  
Page 1-5 – PUC Site Permit should be included in Section 1.4.4.

Response 3:  
The list of entities in the bullet list has been updated with this revision.

MDC Comment 4:  
Rename Chapter 2.0 to make it more appropriate to fulfill the roles of both a state and federal agency document. A possible chapter title may be Environmental Baseline.

Response 4:  
The Chapter title has been edited.

MDC Comment 5:  
Page 2-6 – Two designated Important Bird Areas (IBA) are identified in the BBCS as being within the project area. At this time neither of the designated IBAs are identified on any publicly available lists. Additional review of these designated IBAs should be completed to ensure the BBCS is accurate. The report appears to be confusing the Prairie Coteau Complex Ecoregion, the Prairie Pothole Bird Conservation Region, and the Eastern Tallgrass Prairie Bird Conservation Region as IBAs. Although the Ecoregion and Bird Conservation Region are important to note, they are much larger landscape areas with broader goals than a designated IBA.

Response 5:  
Information regarding IBAs in Minnesota has been reviewed. Information from the Audubon Society's website as well as GIS data was reviewed. This information includes delineation of the boundaries of the IBAs in Minnesota. This information is available at:

- <http://mn.audubon.org/important-bird-areas-3>
- <http://www.arcgis.com/home/webmap/viewer.html?webmap=3b3d225539f8449daf84be6aa89eab50>
- <http://www.dnr.state.mn.us/iba/index.html>

IBA's are first discussed in Answer 1-2 with the following language:  
“In November 2012, The Audubon Society of Minnesota designated six separate areas lying within the Prairie Pothole and Eastern Tallgrass Prairie Bird Conservation Regions as an Important Bird Area (IBA). This area is designated as the “Prairie Coteau Complex IBA”. Portions of the IBA occupy the northwestern corner and a small portion of the far southeastern corner of the Project area.”

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The Prairie Coteau Complex IBA is included in the Audubon information and Minnesota area number 35 on their interactive GIS database. This area and some other Audubon-designated IBAs are not included in the MDNR data.

Language referencing IBAs is contained in Answer I-2 page 2-3, Section 2.2.3 page 2-4, Section 2.2.3.1 page 2-6, and Answer II-6 page 2-13 in the revised BBCS. The document makes a differentiation between the Conservation Regions and the IBAs. The Project requests any detailed additional information if the language regarding IBAs is incorrect in the opinion of the MDC.

MDC Comment 6:

The Stoneray BBCS currently does not identify the greater prairie-chicken (*Tympanuchus cupido*), big brown bat (*Eptesicus fuscus*) and the little brown bat (*Myotis lucifugus*) as state listed as Special Concern. Additionally, the BBCS indicated that state listed species are designated by county as is the case with federally listed species, which is not accurate. State listed species are protected throughout their entire range within the State of Minnesota, and county listings or designations are not applicable. All wording within the BBCS which indicates the county designation of state listed species should be removed.

Response 6:

The language throughout the document has been edited to reflect this comment.

The greater prairie-chicken is not known from the Project area according to the MDNR data. Sections such as 2.2.3.3 discuss the Desktop State Listed Species Review; therefore the greater prairie-chicken would not be included in this section, as the data evaluated in a desktop review (*i.e.*, MDNR data) did not indicate this species is a concern for the Project. Field efforts for the Project noted one audible observation of the species, which was likely a transient or isolated presence and circumstance. This observation and species is discussed in other sections of the document.

MDC Comment 7:

Greater prairie chickens are discussed in the Stoneray BBCS, and EERA offers the following comments:

Page 3-4 – The BBCS points out that the greater prairie chicken is not protected by MBTA, which is correct. However, the USFWS has issued a white paper for guidance regarding prairie grouse species, which includes greater prairie chickens.

- Manville, A.M., II. 2004. Prairie grouse leks and wind turbines: U.S. Fish and Wildlife Service justification for a 5-mile buffer from leks; additional grassland songbird

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recommendations. Division of Migratory Bird Management, USFWS, Arlington, VA, peer-reviewed briefing paper. 17 pp.

Response 7-A:

This reference, and others, have been re-reviewed and added to the document resulting in a more robust position for the Project. There is research as well as range-wide efforts by agencies and developers to understand and minimize impacts to the prairie-grouse species.

Additionally, Manville (2004) states:

“The Service reiterates that our wind siting guidelines are voluntary; we are not restricting installation of wind turbines or wind facilities within a 5-mile radius of active leks.”

Manes and Obermeyer (2013) state:

“The study indicates that wind energy facilities in fragmented grasslands may pose some detriments to prairie chickens; but those detriments, in certain settings, may be less than previously anticipated...”

Merrill et al. (1999) states:

“(In Minnesota) traditional leks were surrounded by less forest and cropland and by larger grassland patches than were temporary leks.”

The Project also would like to put forth that the audible observation of only one greater prairie-chicken does not equate to the creation, verification, or documentation of a breeding “lek” by the accepted survey standards for the species. Project siting has avoided intact native prairie and other habitats determined by the MDNR as sensitive. The Project area is highly fragmented with roads, power lines, existing wind generation facilities and infrastructure, homes and farms, meteorological towers, and other development. For these reasons, the Project area is generally unsuitable for supporting greater prairie chickens.

Page 3-5 – In Table 3-1 the greater prairie chicken is marked with ~\*, but there is no explanation as to what these symbols indicate.

Response 7-B:

This has been edited to include this clarification for the greater prairie-chicken as well as other species in Table 3-1.

Page 3-7 – The BBCS statement, “Additional wind generation facilities would not likely add to any cumulative impacts to the greater prairie chicken.” This statement assumes that the local population of greater prairie chickens are currently using the operating facilities, and

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the greater prairie chickens are currently not avoiding utilization of habitat due to the operation of turbines in the area. This statement should be removed unless you have data to support these conclusions.

Response 7-C:

The language has been edited to remove this statement. The assumptions to be made from the original statement includes that the habitat in the Project area is generally unsuitable for supporting greater prairie-chickens as a result of land use and a high degree of fragmentation. No conclusions should be drawn from the studies and documents put forth by the Project (*i.e.*, within the BBCS, LWECS application packet and appendices) that 1) there are local populations of greater prairie-chickens, 2) that individual greater prairie-chickens are utilizing developed habitat in the area.

Page 3-5 now includes the following statement:

“It is not anticipated that the Project would have a negative impact on the greater prairie-chicken due to general lack of suitable habitat for the species in the Project area, highly fragmented and diverse land use practices and habitats within the Project area, and the lack of historical documented occurrences in the region (*i.e.*, MDNR data and only one observation during the APC surveys despite a significant repeated survey effort in 2012).”

Page 3-14 – Question III-2 should have further consideration and discussion of greater prairie chickens in the area. Possibly provide an explanation from the standpoint of large intact tracts of possible habitat not being present within the site, or siting turbines and infrastructure away from the larger intact tracts of habitat.

Response 7-D:

The language has been edited to reflect this consultation.

MDC Comment 8:

Page 3-14 – Question and Answer III-1 should (have) identified state listed species of special concern, not just threatened and endangered.

Response 8:

The language has been edited to include these species.

MDC Comment 9:

Page 3-15 – Question and Answer III-3 should have further discussion on turbine placement in close proximity to potential upland sandpiper habitat. Upland sandpipers have aerial flight

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displays during courtship, which tend to begin over preferred prairie habitats but can terminate a significant distance from where they begin. During these flights the sandpipers would likely be less aware of turbines in the area, and could fly through the rotor swept area.

Response 9-A:

The language has been edited to reflect the comment above.

Answer III-3 states, “to the extent practicable,” remnant native prairie will be avoided, which implies that remnant native prairie will be impacted to some degree. It should be clarified as to if remnant native prairie will be impacted, and if so, to what extent. If remnant native prairie will be impacted, this will trigger a prairie management plan, per PUC Site Permit condition 4.7.

Response 9-B:

The language has been edited. Remnant native prairie will not be impacted by the Project.

MDC Comment 10:

Page 3-16 – The statement, “Tier IV analysis includes post-construction studies designed to assess whether Project-specific predictions of fatality risk and direct and indirect impacts to habitats,” is confusing and needs to be revised. This statement implies that project-specific predictions for fatalities and habitat impacts have been made or specifically stated in the BBCS, which they have not. A range of anticipated bat and bird fatalities should be stated in the BBCS, and anticipated direct and indirect habitat impacts should be quantified and specified in the BBCS. Without specifically stating anticipated project impacts, there is no way to provide post-construction analysis and comparison to what was anticipated.

Response 10:

The language has been revised in the BBCS, including an extensive review of the available literature from the Buffalo Ridge Wind Generation Area, upper Midwest, and region. Mortality estimates from other projects are included and compared to the anticipated mortality risk for the Project. Tier III classification conclusions are also used to develop a determination of Project risk to avian, bat, and sensitive species.

MDC Comment 11:

Chapter 4.0 should be restructured and separated into four chapters; Project Risk Assessment, Project Impact Avoidance and Minimization Measures, Post-construction Monitoring, and Implementation of the ABPP/BBCS.

Response 11:

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The organization of the document and language has been edited to include this suggestion by modifying Chapter 3, adding Chapters 4 and 5, and moving Chapter 6 (formerly Chapter 4).

MDC Comment 12:

Post construction studies and monitoring are identified, and it is stated they will be completed using the survey protocol developed by MDNR for low risk sites. The detailed methods for the proposed post construction monitoring should be included in the BBCS; as the final protocols to be used must be reviewed by EERA and MDNR.

Response 12:

The language has been edited to reflect the consultations.

MDC Comment 13:

Chapter 4.0 of the BBCS does not contain a conclusion sub-section as the title implies. EERA recommends that a conclusion sub-section be added to the BBCS, and this sub-section should be developed to include analysis of fatality monitoring data, conclusions and recommendations developed by Stoneray from the data, and discussion of the process by which the data, conclusions, and recommendations are submitted to and discussed with the Commission, EERA, and MDNR.

Response 13:

Section 6.4 of the revised document (formerly within Chapter 4) has been revised to include additional conclusions and considerations.

MDC Comment 14:

Page 4-2 – The BBCS statement, “External lighting of the facilities in the Project has been minimized to the maximum extent possible. Kerlinger (2000) reports the relative absence of large-scale avian fatality events at wind farms lit in this manner. This approach to lighting appears to reduce avian and bat fatalities.” should be moved to section 4.2.4.2 Project Facilities.

Response 14:

The language has been edited to reflect the consultation.

MDC Comment 15:

Page 4-3 – Section 4.3.2 states that disturbed native prairie habitat will undergo restoration. Again, if native prairie will be disturbed/impacted, a native prairie management plan will be required per the PUC Site Permit condition 4.7.

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Response 15:

The Project will not impact native prairie. The language has been edited to reflect this siting consideration.

MDC Comment 16:

Page 4-4 – In section 4.4.5 what does “generally educate” mean?

Response 16:

The language has been edited to reflect the consultations.

MDC Comment 17:

Page 4-4 – Section 4.4.6 Incident Reporting indicates that significant events, 5 carcasses or more, and mortality of state and federally protected species will (be) reported to the agencies on an annual basis. These events should be reported within 24 hours.

Response 17:

The language has been edited to reflect the consultations.

MDC Comment 18:

Page 4-5 – Section 4.4.8 should have a contact in the EERA office.

Response 18:

The language has been edited to reflect the consultations.

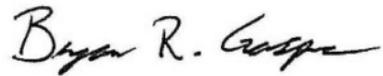
### **Conclusions**

The Project team believes these responses, changes to the document, and addition of figures fulfill the requests described in the MDC comments. Additionally, based on the studies completed, consultations, and Project siting, we do not believe that Project will result in adverse impacts to protected species.

If you have any questions regarding the responses, please let us know as soon as possible. Please contact Bryan Gasper (Biologist) at (816) 349-6770 or [bgasper@burnsmcd.com](mailto:bgasper@burnsmcd.com) or Justin Bailey (Project Manager) at (816) 822-4311 or [jbailey@burnsmcd.com](mailto:jbailey@burnsmcd.com) at your convenience. However, for other components of the Project to remain on schedule, we request a response from your office as soon as possible. Additional comments will be addressed as received from other agencies, as applicable.

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Sincerely,



Bryan R. Gasper  
Senior Environmental Scientist/Wildlife Biologist  
Burns & McDonnell Engineering Company, Inc.  
9400 Ward Parkway  
Kansas City, Missouri 64114  
816-349-6770  
bgasper@burnsmcd.com

cc: Melissa Peterson, EDF Renewable Energy  
Justin Bailey, Burns & McDonnell  
Andy Kim, EVS  
Files

Enclosures



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December 18, 2013

Ms. Jamie Schrenzel  
Minnesota Department of Natural Resources  
Division of Ecological and Water Resources  
500 Lafayette Road  
St. Paul, Minnesota 55155

Re: Responses to Comments from the MDNR for the Bird and Bat Conservation Strategy for the  
EDF Renewable Energy Stoneray Wind Project  
Burns & McDonnell Project No. 62823

Dear Ms. Schrenzel:

Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) is providing environmental support services for the EDF Renewable Energy (EDF) proposed 105-megawatt (MW) wind energy facility, the Stoneray Wind Project (Project), to be located in Pipestone and Murray counties in southwestern Minnesota.

For the purpose of continuing coordination with the Minnesota Department of Natural Resources (MDNR) regarding the Project, we are providing responses to the comments (dated December 4, 2013) provided by the MDNR for the Project Bird and Bat Conservation Strategy (BBCS). Each comment provided by the MDNR is included in the order which they were itemized by the MDNR. The response is provided immediately below the comment. Several responses include reference to edited language in the BBCS. A revised version of the BBCS is included in the Enclosures.

#### **MDNR Comments and Project Responses**

MDNR Comment:

Page 2-12: States, "Species-specific seasonal construction or BMP requirements will be implemented in coordination with the DNR." This is in regard to Blanding's turtles. The DNR has previously recommended that turbines be constructed within potential Blanding's turtle habitat/nesting areas from November 1 – April 30. Though it is understandable that turtles may not be discussed in a Bird and Bat Conservation Strategy, rare species BMPs for species other than birds and bats should be included in an appropriate portion of the record reviewed prior to issuance of a site permit.

Response:

The language for this section has been edited to reflect the DNR comment above. Additionally, this information was included in the Site Permit Application for a Large Wind Energy Conversion System (LWECS), PUC Docket No. IP-6646/WS-13-216.

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MDNR Comment:

Page 3-7: States, “Additionally, the presence of many existing wind generation facilities nearby and within the Project site in a variety of locations indicates that the bird(s) currently present are adapted or not being disturbed.” No information has been presented to support this statement. This should not be included in the document. Also, there are known bird fatalities from nearby existing turbines, which would indicate adverse effects, at least to individuals.

Response:

This language has been removed from the document.

MDNR Comment:

Page 3-9: Discusses bat passes per night. A correction letter was sent by the Project developer regarding this information dated November 25, 2013. Information from the correction letter should be added to the BBCS to address what could be otherwise confusing results.

Response:

The language has been edited in the document to reflect this DNR comment and coincide with the correction letter dated November 25, 2013.

MDNR Comment:

Table 2-2: This table seems incomplete and outdated. The species list is not consistent with the text through the document. The northern grasshopper mouse is state-listed as special concern and the plains topminnow is state-listed as threatened.

Response:

The table and language in the document have been updated.

MDNR Comment:

Section 2.2.3.1: The document states that there are four kinds of rare native plant communities within the Project site. Will these communities be avoided? A map showing these communities along with the turbine locations, access roads, and other areas of disturbance would be helpful.

Response:

These areas will be avoided by the Project. The language in the report has been edited to reflect avoidance of these areas. Figures 5 and 6 in Appendix A have been added depicting these areas.

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MDNR Comment:

Section 2.2.3.3: It is stated that the Project developers have consulted with the DNR regarding state protected species. However, there is no apparent record of consultation with the Endangered Species Review Coordinator.

Response:

Appendix B – MDNR Project Correspondence and the license agreement has been added as well as referenced in the document.

MDNR Comment:

Section 2.2.3.4: This section is incorrect. There are seven species of bats known to occur throughout Minnesota. Four of these bats are state-listed as special concern. State-listed species are listed statewide; there are no exclusions for certain counties.

Response:

The language has been edited to reflect the comment above.

MDNR Comment:

Section 2.2.4: The document states that species are reported via MDNR data. Is this referring to the Rare Features Data? If so, the document should list the License Agreement number and the date of the data. No Natural Heritage Review or Natural Heritage Concurrence has been completed for this Project.

Response:

The language has been edited to reflect the MDNR consultations.

MDNR Comment:

Section 3.1.1.2: The greater prairie-chicken is a state-listed species of special concern. It is listed statewide; there are no exclusions for certain counties.

Response:

The language has been edited to reflect the comment above.

MDNR Comment:

Section 3.1.1.3: There are four bats state-listed as special concern. State-listed species are listed statewide; there are no exclusions for certain counties. This section should discuss all four species rather than focusing on only one species.

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Response:

The language has been edited to reflect the comment above.

MDNR Comment:

Section 3.1.1.4: This section discusses a habitat assessment for rare species. Will potential habitat be avoided? Providing a map that shows potential habitat along with turbine locations, access roads, and other areas of disturbance would be helpful for this section.

Response:

The Project will not impact these areas. Figures 5 and 6 in Appendix A have been added to the document to illustrate these areas.

Language in the last paragraph in this section states, “Given Project siting to avoid these areas and the relatively small areas that contain suitable habitat, the Project as currently proposed would provide a low risk for adverse effects to these species.”

MDNR Comment:

Section 3.1.2: “Question III-1: Do field studies indicate that species of concern are present on or likely to use the proposed site?” This section as well as Answer III-4 and III-5, pages 3-15, should reflect the updated state listing of special concern bats in Minnesota. The fatality of a special concern bat would be an adverse effect.

Response:

The language has been edited to incorporate the DNR comment above as well as field studies and analyses completed for the Project.

MDNR Comment:

Section 3.1.2: There are state-listed species likely to be present and that will likely be adversely impacted. Specifically, the four state-listed bats and other state-listed species included in this document should be discussed. Blanding’s turtles should also be addressed in the Project record.

Response:

The language has been edited in this section and associated language throughout the document to reflect this DNR comment and similar comments.

The Project developer has and will continue to employ all means practicable to avoid adverse impacts to protected species. Based on the studies completed, consultations, and Project siting, the Project developer does not believe that Project will result in adverse impacts to protected species.

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**MDNR Comment:**

Section 4.1.1: Second bullet: Low risk fatality survey methods as described in the most recent draft of wildlife survey protocol should be used for this site. The DNR can provide the most recent draft of the survey protocol.

**Response:**

The language included reflects this wildlife survey protocol as follows: Recent consultation with the MDNR has indicated the Project area will be a low risk site.

Voluntary avian and bat species fatality surveys will be completed following the protocol developed by the MDNR for low risk sites (MDNR 2012). This includes one field season of post-construction fatality monitoring in addition to the other parameters outlined in “Fatality Monitoring for Low Risk Sites” in the MDNR protocol (2012). These include:

- 1) Minimum of 1 year of searches
- 2) Minimum of one search day per week with a minimum of 3 days of separation between searches
- 3) Minimum number of turbines searched is 10
- 4) Search area of 80 m (160 m per rectangular side) in all cardinal directions from the base of the turbine
- 5) Search time periods covering the peak fatality periods of March 15-June 15 and August 1-October 15
- 6) Searcher efficiency trials using a minimum of 75 placed carcasses
- 7) Scavenger removal trials using a minimum of 50

**MDNR Comment:**

Section 4.2.1: States, “The Project is not located in a key migratory corridor for birds and bats.” This should be removed from the BBCS because bat migratory corridors are not known in Minnesota.

**Response:**

The language has been edited to reflect this DNR comment.

**MDNR Comment:**

Section 4.3.2: Vegetation Clearing and Management states: “Disturbed native prairie habitat will undergo restoration in order to reclaim in.” Are there known impacts proposed to native prairie? If so, these should be described in the Project record in detail. If native prairie is proposed to be impacted, then rare species surveys may be required, a Natural Heritage Review is needed, and a

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Prairie Restoration and Management Plan should be completed. Any impact to native prairie other than MBS Native Plant Communities should be clearly identified.

Response:

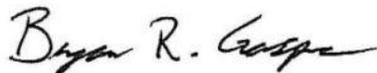
The Project will not impact native prairie. The language has been edited to reflect this siting consideration.

### Conclusions

The Project team believes these responses, changes to the document, and addition of figures fulfill the requests described in the MDNR comments. Additionally, based on the studies completed, consultations, and Project siting, we do not believe that Project will result in adverse impacts to protected species.

If you have any questions regarding the responses, please let us know as soon possible. Please contact Bryan Gasper (Biologist) at (816) 349-6770 or [bgasper@burnsmcd.com](mailto:bgasper@burnsmcd.com) or Justin Bailey (Project Manager) at (816) 822-4311 or [jbailey@burnsmcd.com](mailto:jbailey@burnsmcd.com) at your convenience. However, for other components of the Project to remain on schedule, we request a response from your office as soon as possible. Additional comments will be addressed as received from other agencies, as applicable.

Sincerely,



Bryan R. Gasper  
Senior Environmental Scientist/Wildlife Biologist  
Burns & McDonnell Engineering Company, Inc.  
9400 Ward Parkway  
Kansas City, Missouri 64114  
816-349-6770  
[bgasper@burnsmcd.com](mailto:bgasper@burnsmcd.com)

cc: Melissa Peterson, EDF Renewable Energy  
Justin Bailey, Burns & McDonnell  
Andy Kim, EVS  
Files

Enclosures