

November 9, 2018

Mr. Scott Larson  
North Dakota Field Office, United States Fish & Wildlife Service  
3425 Miriam Avenue  
Bismarck, ND 58501

RE: Aurora Wind Project, LLC (2018-CPA-0017)

Dear Mr. Larson:

Aurora Wind Project, LLC (Aurora) is developing the Aurora Wind Energy Project (Project) in Williams and Mountrail counties, North Dakota. Aurora submitted an Application for a Certificate of Corridor Compatibility and Route Permit to the North Dakota Public Service Commission on September 28, 2018 (Application). Prior to submitting the Application, Aurora's consultant, Burns & McDonnell (B&McD), sent consultation letters to various agencies and other stakeholders, including the North Dakota Field Office, United States Fish & Wildlife Service (USFWS). In response, we received your letter dated October 12, 2018. I am writing this letter to provide specific responses to the matters discussed in your letter. For clarity, "Project" in this letter only references the approximately 20-mile overhead transmission line Project and associated Application in Williams and Mountrail counties. The associated wind energy conversion facility in Williams County will be addressed in separate correspondence.

As an initial matter, I spoke to Mr. Jerry Reinisch on October 24, 2018 regarding your letter. Per my discussion with Mr. Reinisch, I understand that the reference to the "BCWEC" project in the October 12 letter was a typographical error and therefore we will consider the USFWS intended to reference "Aurora".

Since you have been recently assigned to the Project, you may be unfamiliar with the history of Aurora's Project development and consultation with USFWS and the North Dakota Game and Fish Department (NDGFD). Aurora has been developing the Project in Williams and Mountrail counties, North Dakota since 2016. Throughout development, Aurora has been committed to siting, constructing, operating, and decommissioning the Project in an environmentally responsible and sustainable manner. The Project followed the tiered decision framework outlined in the USFWS's Land Based Wind Energy Guidelines ("WEG"; USFWS 2012) and the Eagle Conservation Plan Guidance ("ECPG"; USFWS 2013) and coordinated this with USFWS and NDGFD. The Project has contracted with Western Ecosystems Technology, Inc. (WEST), Stantec Consulting Services (Stantec) and B&McD to conduct desktop and field surveys to evaluate the wildlife and potential habitat of sensitive species in the Project and surrounding areas. Below is a partial list of the field and desktop surveys completed within the Project and surrounding areas:

- Site Characterization Study (2017)
- Stage 1 Site Assessment of Eagle Use/Risk (2018)
- Eagle and Avian Use point count surveys (2016 - 2018)
- Aerial raptor and eagle nest surveys (2017 and 2018)

- Acoustic bat activity surveys (2017 and 2018)
- Sharp tailed-grouse lek surveys (2018)
- Dakota skipper habitat assessment (2018)
- Whooping crane habitat assessment (2018)
- Wetland delineations (2018)

Aurora understands that early and often consultation with state and federal wildlife agencies is an important part of developing and operating wind energy projects for Aurora as well as being an integral part of the ECPG and WEGs, and has engaged with the North Dakota Field Office throughout development. Below is an outline of meetings and correspondences (where written correspondence is available) with your agency prior to your October 12, 2018 letter and my discussion with Mr. Reinisch on October 24, 2018:

- In person meeting with USFWS and NDGFD - February 8, 2017
- Letters to USFWS and NDGFD – December 21, 2017
- Email to USFWS – April 24, 2018
- Email to USFWS – August 7, 2018
- Email to USFWS and NDGFD – August 13, 2018
- In person meeting with USFWS and NDGFD – August 16, 2018
- Email from USFWS – August 23, 2018
- Email transmittal of August 16, 2018 meeting notes to USFWS and NDGFD – September 12, 2018
- Email transmittal of updated August 16, 2018 meeting notes to USFWS and NDGFD – September 21, 2018

Copies of these meeting notes and correspondences are attached to this letter for your convenience and reference.

In addition to the consultation with USFWS, Aurora has also had regular contact, both written and in person, with the North Dakota Game and Fish Department (NDGFD) since 2017 on state wildlife laws including species on the State of North Dakota Species of Conservation Priority list.

Several habitat types and specific species were addressed at length in your October 12, 2018 letter. For your information, below is a summary of the analysis and consultation that has occurred with respect to each.

#### USFWS Grassland and Wetland Easements

Aurora understands the importance of native grasslands and the value of the habitat they provide to a number of species that utilize the prairie pot-hole region. Aurora incorporated wetland and grassland easements held by USFWS into the siting and the design of the Project. Aurora communicated with the USFWS's Refuge Manager at the Lostwood Waterfowl Management District Complex in April 2018 for a review of the proposed Project area and again in August 2018 once a more refined Project area and design were known. Per written communication from the Refuge

Manager in August 2018, *"I see no obvious issues or impacts to USFWS wetland and grassland easements; or Waterfowl Production Areas. A tremendous effort was obviously put forth to avoid direct impacts to USFWS property interests. I greatly appreciate your work."* (emphasis added).

### Dakota Skipper

Avoidance of potential impacts to the federally threatened Dakota skipper was also considered during Project siting and avoidance of USFWS grassland easements. While areas of potential habitat were mapped within the overall Project Corridor, no actual structures will be located within the mapped potential habitat areas. Additionally, and as noted in the Application, impacts outside of the reproductive habitat but within grasslands in Mountrail County will be avoided during the adult flight period of late June through late July, avoiding potential impacts to adults. Through implementation of the avoidance and minimization measures, no impacts to Dakota skipper are anticipated. As indicated above, the Project has avoided all USFWS protected grassland easements.

### Whooping crane

Aurora is within the migratory corridor of the Aransas/Wood Buffalo population of whooping cranes, which pass through the area twice per year during their spring and fall migrations. Mortality due to collision with transmission lines is a known threat to fledged whooping cranes (Stehn and Wassenich 2008); however, no turbine caused mortalities are known (Derby et al. 2012). During the siting and development of the Project, Aurora identified the Big Meadow Waterfowl Production Area (Big Meadow) as high quality stopover habitat near the Project. Aurora has set back all facilities a minimum of two miles from Big Meadow. Aurora has committed to marking all of the Project's overhead transmission line to the Point of Interconnection at the existing Tande Substation in Mountrail County as we indicated to the USFWS during our August 16, 2018 meeting and as documented in meeting notes provided in September 2018. The Project will design and construct the overhead transmission line to be raptor friendly, following *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (Edison Electrical Institute). Additional and whooping crane specific monitoring and avoidance measures will be outlined in the Project's Bird and Bat Conservation Strategy (BBCS). Per the WEGs, the BBCS is a living document and as the Project continues through construction and operations, potential risk to all species will be evaluated and appropriate measures will be taken to address changes in the Project and surrounding area, if necessary.

In addition, during the wetland delineations completed by B&McD in 2018, Aurora took steps to minimize potential risk to existing avian stopover resources in the Project. During field surveys, the Project directed B&McD to analyze 1) all wetlands greater than 0.5 acres in size, 2) all wetlands considered to be high quality (smaller than 0.5 acres but located in non-agricultural fields and dominated by higher quality, non-invasive wetland species), and 3) all other wetlands. Aurora has taken this survey information into account with the design and micro siting of infrastructure.

## Survey Results and On-going Consultation

The results of the desktop and field surveys as well as consultation with USFWS and NDGFD will be outlined in the BBCS currently being drafted. As discussed in the meeting with Kevin Shelley with USFWS on August 16, 2018, and in meeting notes provided on September 21, 2018, the Project committed to sharing the draft BBCS with both USFWS and NDGFD for review and comment. In addition, Aurora noted that another meeting with both USFWS and NDGFD could potentially occur before the yet to be scheduled Public Service Commission public hearing to discuss any additional topics, including post-construction monitoring and habitat restoration. We would like to schedule this meeting in early December or early January.

Throughout development, Aurora has been committed to siting, constructing, operating, and decommissioning the Project in an environmentally responsible and sustainable manner. The Project followed the tiered decision framework outlined in the USFWS's Land Based Wind Energy Guidelines ("WEG"; USFWS 2012) and the Eagle Conservation Plan Guidance ("ECPG"; USFWS 2013) and coordinated this with USFWS and NDGFD. Aurora has taken steps to incorporate sensitive resources and USFWS and NDGFD input into the Project design and to minimize the potential to impact these resources.

Please feel free to contact me with any questions.

Sincerely,



Jennifer A. Dean

VP - Environmental Studies & Permitting

Tradewind Energy, Inc.

16105 West 113<sup>th</sup> Street, Suite 105

Lenexa, KS 66219

913-322-7428 - office

913-219-5004 - mobile

[jidean@tradewindenergy.com](mailto:jidean@tradewindenergy.com)

## Attachments

cc: Dave Iadarola, Aurora  
Brice Barton, Aurora  
Clayton Derby, WEST  
Justin Bailey, B&McD  
Terry Steinwald, North Dakota Game and Fish Department  
Greg Link, North Dakota Game and Fish Department  
Steve Dyke, North Dakota Game and Fish Department  
John Schumacher, North Dakota Game and Fish Department  
Jerry Reinisch, United States Fish & Wildlife Service  
North Dakota Public Service Commission (PU-18-351)



## ENVIRONMENTAL & STATISTICAL CONSULTANTS

4007 State Street, Suite 109, Bismarck, ND 58503  
Phone: 701-250-1756 • www.west-inc.com • Fax: 701-250-1761

**TO: USFWS and NDGFD**

**RE: Aurora Wind Farm Survey Update and Planning for Future Efforts**

**DATE: February 8, 2017**

Western EcoSystems Technology, Inc. (WEST) has been assisting Aurora Wind Project, LLC (Aurora), a subsidiary of Tradewind Energy, Inc., in implementing Tier 2 and 3 actions as described in the USFWS Wind Energy Guidelines (WEG) and USFWS Eagle Conservation Planning Guidance (ECPG) for the proposed Aurora Wind Farm (Project). The Project encompasses approximately 54,316 acres and is located in Williams County, North Dakota (see attached figures). The purpose of this memo is to facilitate a discussion related to ongoing activities as well as future efforts that may be appropriate for the Project. Aurora understands that there are ongoing activities in North Dakota between wind project developers, agencies, and NGOs and that these concurrent discussions may help shape future survey needs.

### **Current Efforts**

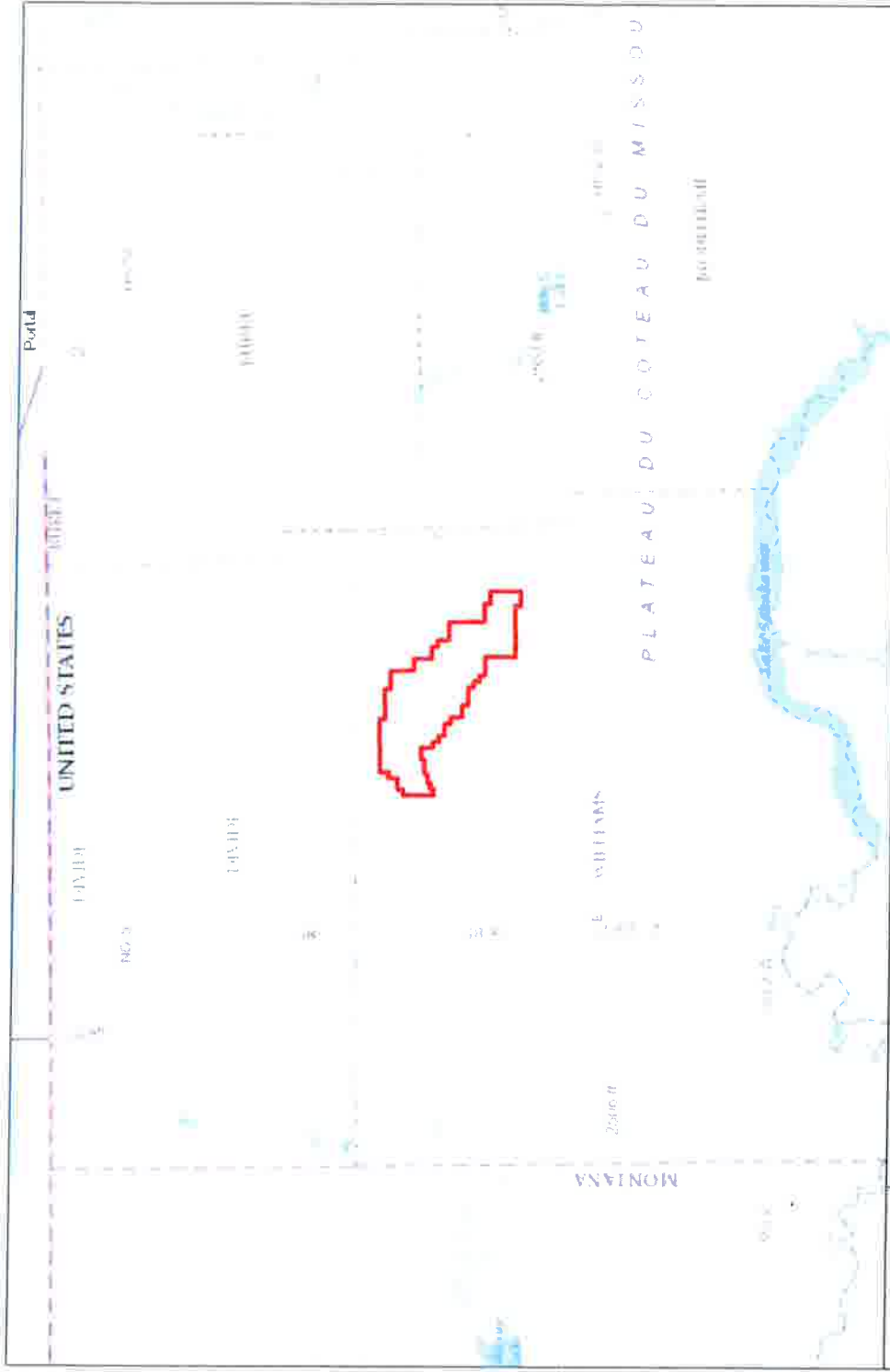
- Site Characterization Study (SCS)
- ECPG Stage 2 Eagle Evaluation
- Whooping Crane Habitat Evaluation
- Eagle/Avian Use Surveys

### **Future Efforts**

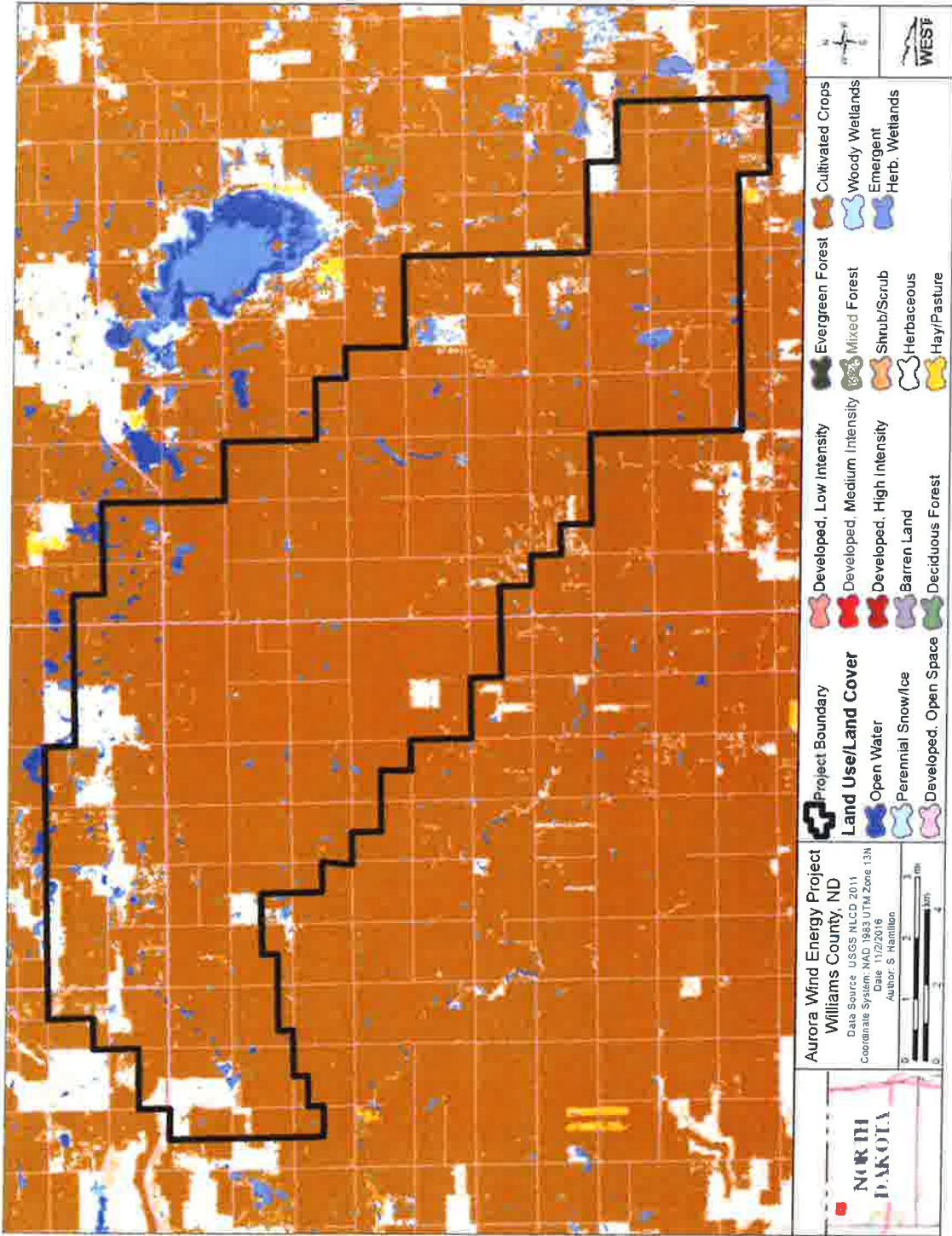
In addition to the efforts described above that are completed or ongoing, Aurora is contemplating the need for any future survey needs to help inform risk and Project layout. There may be opportunities to inform and/or offset potential Project impacts without the need for extensive field surveys. Future efforts could include:

- Raptor and Eagle Nest Surveys
- Year 2 Eagle Use
- Grouse Lek Surveys
- Dakota Skipper Surveys

While Aurora has been actively evaluating the proposed Project location following the WEG and ECPG, there do remain some questions that could be better informed through surveys, some fairly costly, or there may be opportunities to collaboratively evaluate potential risks with the information collected to date. This ultimate evaluation could be followed with reasonable post-construction fatality monitoring to confirm low risk. In addition, there may be opportunities to conduct more directed research efforts (potentially off the Project) to answer some of the larger questions being posed by the wildlife community regarding wind development in North Dakota (e.g., impacts to Sprague's pipit, impacts on sharp-tailed grouse). In addition, there may be help fund habitat restoration or conservation programs that would benefit wildlife in general in North Dakota.



	<p><b>Aurora Wind Energy Facility</b> Williams County, ND</p> <p>Data Source: World Topographic Map Coordinate System: NAD 1983 UTM 20N+ 13N Date: 11/12/2016 Author: S. Hamilton</p>				
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**Aurora Wind Energy Project**  
**Williams County, ND**  
 Data Source: USGS NLCD 2011  
 Coordinate System: NAD 1983 UTM Zone 13N  
 Date: 11/2/2016  
 Author: S. Hamilton

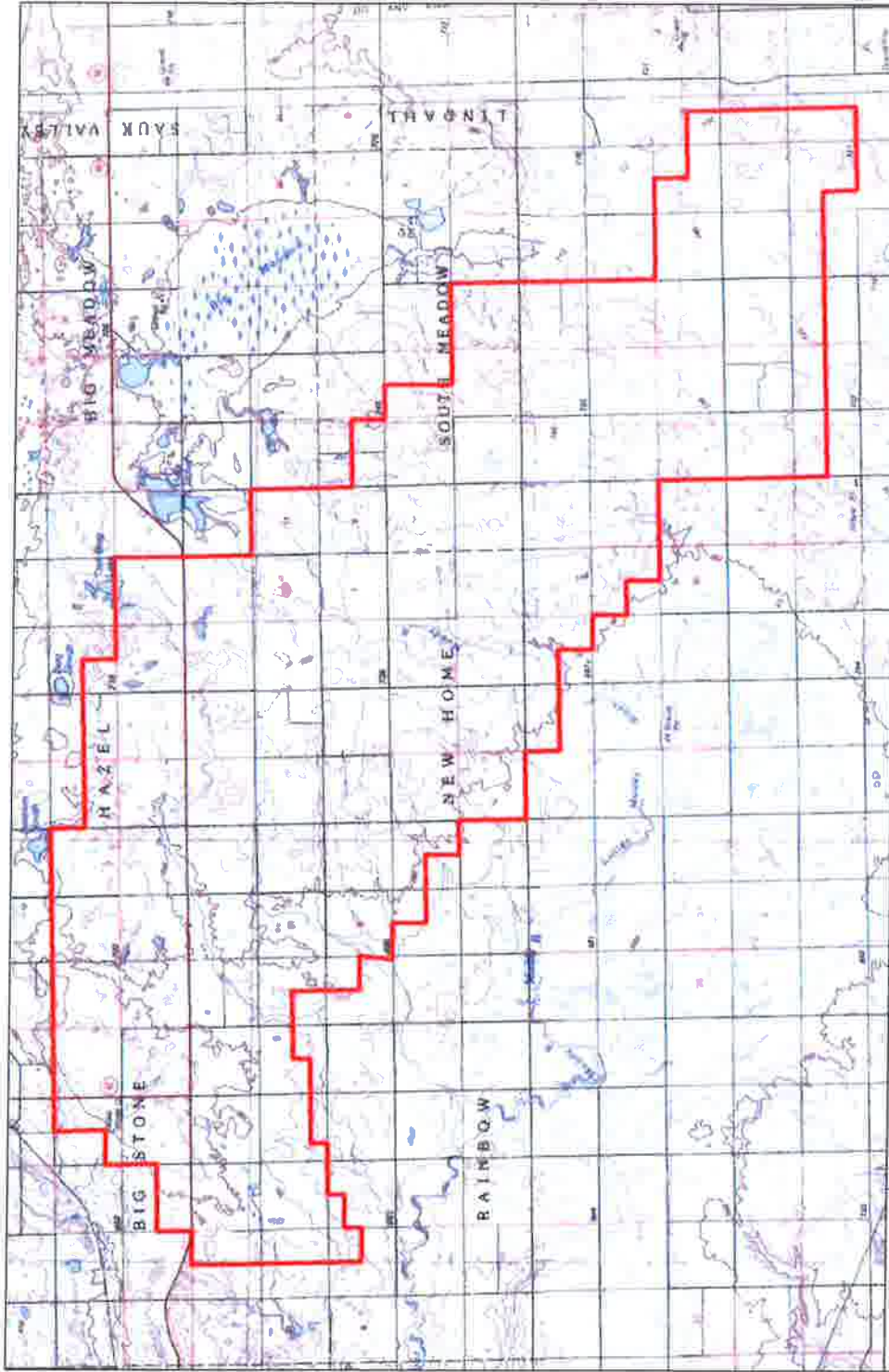
**Project Boundary**  
**Land Use/Land Cover**  
 Open Water  
 Perennial Snow/Ice  
 Developed, Open Space

Developed, Low Intensity  
 Developed, Medium Intensity  
 Developed, High Intensity  
 Barren Land  
 Deciduous Forest

Evergreen Forest  
 Mixed Forest  
 Shrub/Scrub  
 Herbaceous  
 Hay/Pasture

Cultivated Crops  
 Woody Wetlands  
 Emergent Herb. Wetlands





	<b>Aurora Wind Energy Project</b> Williams County, ND		
	Data Source: USA Topo Maps Coordinate System: NAD 1983 UTM Zone 18N Date: 11/1/2016 Author: S. Hamilton		



December 21, 2017

Addressee Name  
Addressee Title  
Organization  
Address Line 1  
City, State Zip Code

Re: Information Request for the Proposed Aurora Wind Project and Associated Transmission Line in Williams and Mountrail Counties, ND

Dear Recipient:

Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) has been contracted by Aurora Wind Project, LLC (Aurora), a subsidiary of Tradewind Energy, Inc. (Tradewind), to assist with obtaining permits from the North Dakota Public Service Commission (NDPSC) for the proposed Aurora Wind Project (Wind Project) in Williams County, North Dakota, and an associated transmission line (Transmission Line Project) in Williams and Mountrail Counties, North Dakota. Two separate NDPSC applications will be prepared: (1) an Application for a Certificate of Site Compatibility for the proposed Wind Project; and (2) a Consolidated Application for a Certificate of Corridor Compatibility and Route Permit for the proposed Transmission Line Project.

The proposed Wind Project would be approximately 300 megawatts (MW); the proposed location of specific infrastructure has not yet been determined. The Wind Project would interconnect to the electrical grid via the existing Basin Electric Power Cooperative Tande 345-kilovolt (kV) Substation (Tande Substation), located in the Northeast Quarter of Section 29, Township 157 North, Range 94 West, Mountrail County, North Dakota. The current potential development area for the Wind Project is shown in the attached Figure 1.

The Wind Project area includes portions of the following tracts:

County	Township	Range	Sections
Williams	157 N	95 W	6, 7
Williams	157 N	96 W	1-18
Williams	157 N	97 W	1, 11-14
Williams	158 N	95 W	31
Williams	158 N	96 W	5-9, 15-22, 27-36
Williams	158 N	97 W	1-16, 22-28, 33-36
Williams	158 N	98 W	1, 4, 5



Addressee Name  
Organization  
December 21, 2017  
Page 2

<b>County</b>	<b>Township</b>	<b>Range</b>	<b>Sections</b>
Williams	159 N	96 W	31
Williams	159 N	97 W	14-36
Williams	159 N	98 W	13-15, 21-29, 32-36

The proposed Transmission Line Project would extend from the Wind Project substation in Williams County to the point of interconnection at the Tande Substation in Mountrail County. The Transmission Line would consist of approximately 25 miles of 345-kV overhead transmission line. The current potential development area and potential route for the Transmission Line Project are shown in the attached Figure 2.

The Transmission Line area includes the following tracts:

<b>County</b>	<b>Township</b>	<b>Range</b>	<b>Sections</b>
Mountrail	157 N	94 W	7, 8, 17-20, 29
Williams	157 N	95 W	7-18
Williams	157 N	96 W	3-16
Williams	158 N	96 W	19, 29-32
Williams	158 N	97 W	1, 2, 11-14, 23-26, 36

In conjunction with preparing the referenced applications, we are seeking input from your agency or entity regarding any sensitive resources, current or planned development, or property interests your agency or entity may have in or around the Project Areas that Aurora should consider as it moves forward with development. In addition, we ask that you provide information regarding any applicable permits that may be required from your office. At this point, the Project is not anticipated to require federal funding or to otherwise have a federal nexus. For your information, we have sent similar query letters to other agencies and entities, including, but not limited to, the U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and North Dakota Game and Fish Department.



Addressee Name  
Organization  
December 21, 2017  
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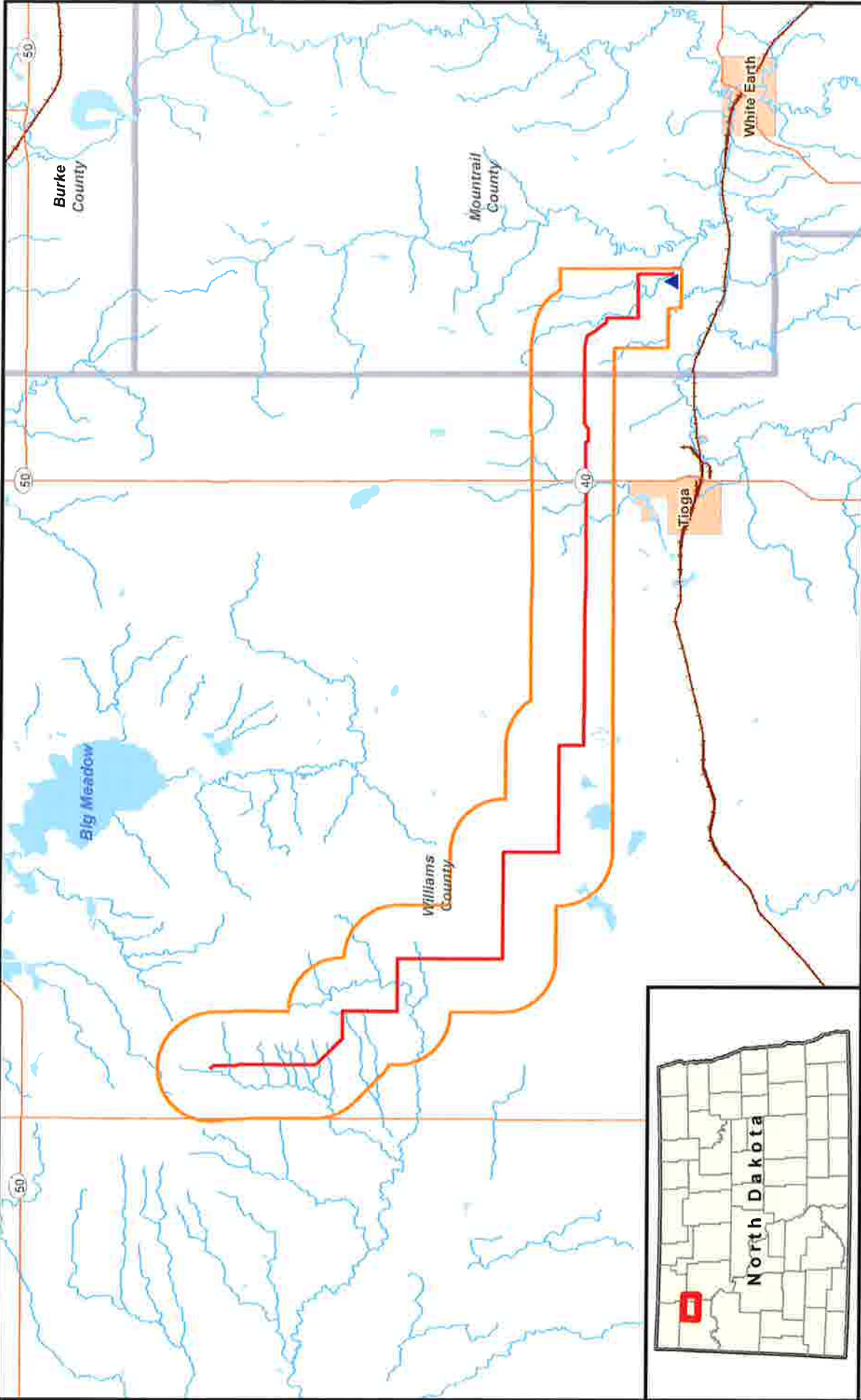
We would appreciate a response by January 21, 2018. Please contact me at (303) 474-2229 or [jbelle@burnsmcd.com](mailto:jbelle@burnsmcd.com) if you have any questions. Thank you for your assistance.

Sincerely,

Jennifer Bell  
Senior Environmental Scientist  
Burns & McDonnell  
9785 Maroon Circle, Suite 400  
Centennial, CO 80112

Attachment

cc: Jennifer Dean, Vice President, Environmental Studies & Permitting, Tradewind



- Proposed Transmission Line Route
- Proposed Transmission Line Project Area
- Tande Substation
- Major Road
- County Boundary



Figure 2  
Project Location Map  
Transmission Line Project  
Aurora Wind Project, LLC  
Williams and Mountrail Co., ND



## Jennifer Dean

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**From:** Clayton Derby <cderby@west-inc.com>  
**Sent:** Tuesday, April 24, 2018 11:00 AM  
**To:** Jennifer Dean  
**Subject:** Fwd: [EXTERNAL] Aurora - t-line structures easement request

Hi Jenni

No easements in the t-line corridor.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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----- Forwarded message -----

**From:** Richardson, Kory <[kory\\_richardson@fws.gov](mailto:kory_richardson@fws.gov)>  
**Date:** Tue, Apr 24, 2018 at 9:26 AM  
**Subject:** Re: [EXTERNAL] Aurora - t-line structures easement request  
**To:** Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)>  
**Cc:** Terri Thorn <[tthorn@west-inc.com](mailto:tthorn@west-inc.com)>

Clayton - I have reviewed the proposed transmission line and structure placement. No easement protected wetlands or grasslands are impacted. I greatly appreciate your effort in avoiding easement protected areas. Don't hesitate to contact me as you continue to work on development of the proposed Aurora Wind Farm. Thanks.

Kory

On Tue, Apr 24, 2018 at 7:46 AM, Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)> wrote:  
Hello Kory

I hope that spring is going well for you in NW ND. I believe it may have finally arrived here in Bismarck.

Late 2017/early 2018 I sent you a request regarding easement information for the Aurora wind farm. Thank you for providing that information. The company has now identified a potential transmission line route, see attached map and shapefile. Can you please check you records to determine if there are any easements within the route, both grassland and wetland.

Thank you.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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---  
Kory Richardson  
Refuge Manager  
Lostwood WMD Complex  
8315 Hwy 8  
Kenmare, ND 58746

Office: 701-848-2722 x13  
Fax: 701-848-2702  
Cell: 701-339-1451

## Jennifer Dean

---

**From:** Clayton Derby <cderby@west-inc.com>  
**Sent:** Thursday, August 23, 2018 3:55 PM  
**To:** Jennifer Dean; Katherine Moratz  
**Subject:** Fwd: [EXTERNAL] Fwd: Updated Aurora design

Jenni - see review of easement information from USFWS refuge office.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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**From:** Kory Richardson <[kory\\_richardson@fws.gov](mailto:kory_richardson@fws.gov)>  
**Date:** Thu, Aug 23, 2018 at 3:47 PM  
**Subject:** Re: [EXTERNAL] Fwd: Updated Aurora design  
**To:** Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)>

Clayton - I have reviewed the proposed wind tower locations, access roads, crane paths, collection lines, intersections, fiber optic sections, lay down yards, substation, transmission lines and structures associated with the proposed Aurora Wind Project. I see no obvious issues or impacts to USFWS wetland and grassland easements; or Waterfowl Production Areas. A tremendous effort was obviously put forth to avoid direct impacts to USFWS property interests. I greatly appreciate your work.

I see two areas on wetland easement that may or may not be actual wetlands (I can't tell for sure from the aerial imagery etc.) that could potentially be impacted by an access road, collection line or crane path. Once staking

of access roads etc. is complete I would like to take a closer look at those "questionable" sites in the field. On area is 159-97-20, S1/2N1/2 (Williams 210X); and 159-97-21, N1/2N1/2 (Williams 142X,1).

Thank you for the opportunity to review the various components of the Aurora Wind Farm. If you have any questions or concerns please don't hesitate to contact me.

Kory

On Tue, Aug 7, 2018 at 8:05 AM Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)> wrote:  
Hi Kory

Thanks for the past reviews for the Aurora wind project regarding wetland and grassland easements. The project has developed a more refined layout with all the various constraints - road/house setbacks, avoidance of easements, etc. Can you please take another look at this more refined layout to confirm that it avoids all the basins within the wetland easements as well as all the grassland easements? I know that easements are always a bit in motion with new ones coming in and want to make sure a current review has been completed.

Thank you,

**Clayton Derby**  
**CSO / Wildlife Biologist**



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## Jennifer Dean

---

**From:** Clayton Derby <cderby@west-inc.com>  
**Sent:** Monday, August 13, 2018 12:02 PM  
**To:** Kevin Shelley; JOHN SCHUMACHER  
**Cc:** Jennifer Dean; Katherine Moratz  
**Subject:** Re: Aurora Meeting Materials  
**Attachments:** Aurora\_Aug 16 2018\_Agency Memo Final.pdf

With attachment this time.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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On Mon, Aug 13, 2018 at 11:21 AM, Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)> wrote:  
Hello Kevin and John

Attached please find a summary memo and a few figures to help lead the Aurora Wind Project meeting at 1 pm this Thursday, August 16. Please note that the meeting will be at the NDGFD office.

See you on Thursday.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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**ENVIRONMENTAL & STATISTICAL CONSULTANTS**

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Phone: 701-250-1756 • www.west-inc.com • Fax: 701-250-1761

**TO: USFWS and NDGFD**  
**RE: Aurora Wind Energy Project Survey Update**  
**DATE: August 16, 2018**

Western EcoSystems Technology, Inc. (WEST) has been assisting Aurora Wind Project, LLC (Aurora), a subsidiary of Tradewind Energy, Inc., in implementing Tier 2 and 3 actions as described in the USFWS Wind Energy Guidelines (WEG) and USFWS Eagle Conservation Planning Guidance (ECPG) for the proposed Aurora Wind Energy Project (Project). The Project as currently planned encompasses approximately 44,000 acres and is located in Williams and Mountrail counties, North Dakota (Figure 1). The purpose of this memo is to facilitate a discussion related to the completed Tier 2 and Tier 3 wildlife surveys and future survey work at the Project.

**Tier 2 Efforts:**

1. Site Characterization Study
  - Review of biological resources with respect to potential Project development
  - Anticipated low adverse impacts to bird and bat species
2. Whooping Crane Habitat Analysis
  - Assess potential suitability of wetlands within the Project
  - Project had smallest average sized wetlands and the second smallest total wetland acreage and number of basins compared to four adjacent reference areas
  - Project located with the defined whooping crane corridor but all facilities are outside the non-covered lands from WEWAG effort
  - Project falls within unoccupied stopover site use intensity cells
  - No whooping cranes documented in Project area from the USFWS sighting database. Whooping cranes observed during point counts, see Tier 3.
  - Potential to migrate over or through the Project
3. Stage 1 Site Assessment of Eagle Use/Risk
  - Assess if Project is known or likely to be used by eagles
  - Golden eagles uncommon
  - Bald eagles possible since some potential habitat exists (wetland complexes, grasslands) but overall the area lacks nesting habitat
  - NDGFD reports no known bald or golden eagle nests within 10 miles
  - No significant adverse impacts expected

### **Tier 3 Efforts:**

#### 1. Eagle/Avian Use Surveys

- 2 years of surveys
- 1 hour fixed-point surveys at 33 points
- 700 60-minute fixed point surveys
- 4 bald and 2 golden eagles observed during fixed-point surveys
- Anticipated low risk
- Do not plan to seek an eagle permit
- Total of 12 whooping cranes observed flying above rotor swept height with flocks of sandhill cranes on April 24, 2018.
- 

#### 2. Eagle/Raptor Nest Surveys

- 2 years of aerial surveys
- Meandering aerial transects of potential suitable habitat
- Eagle nests within 10 miles and non-eagle raptors within 1 mile of boundary
- No eagle nests observed

#### 3. Sharp-tailed Grouse Lek Surveys

- Road-based surveys in 2018
- 3 surveys from early April to early May
- Limited overall grassland blocks within and adjacent to Project (Figure 3) for lekking, brood rearing, etc.
- 52 points along public roads/trails around grasslands >80 acres
- 5 minutes of observations at each point
- 3 leks observed (2 confirmed and 1 potential; Figure 3)
- Turbines adjusted such that no leks within 1 mile of proposed turbine locations

### **Future Efforts:**

#### 1. Construction and Operations

- Operations personnel training for whooping crane identification and shutdown procedures if within 2 miles of turbines.
- Transmission line to be marked with bird diverters
- Post-construction fatality monitoring (Tier 4 surveys)
- Development of Bird and Bat Conservation Strategy (BBCS)

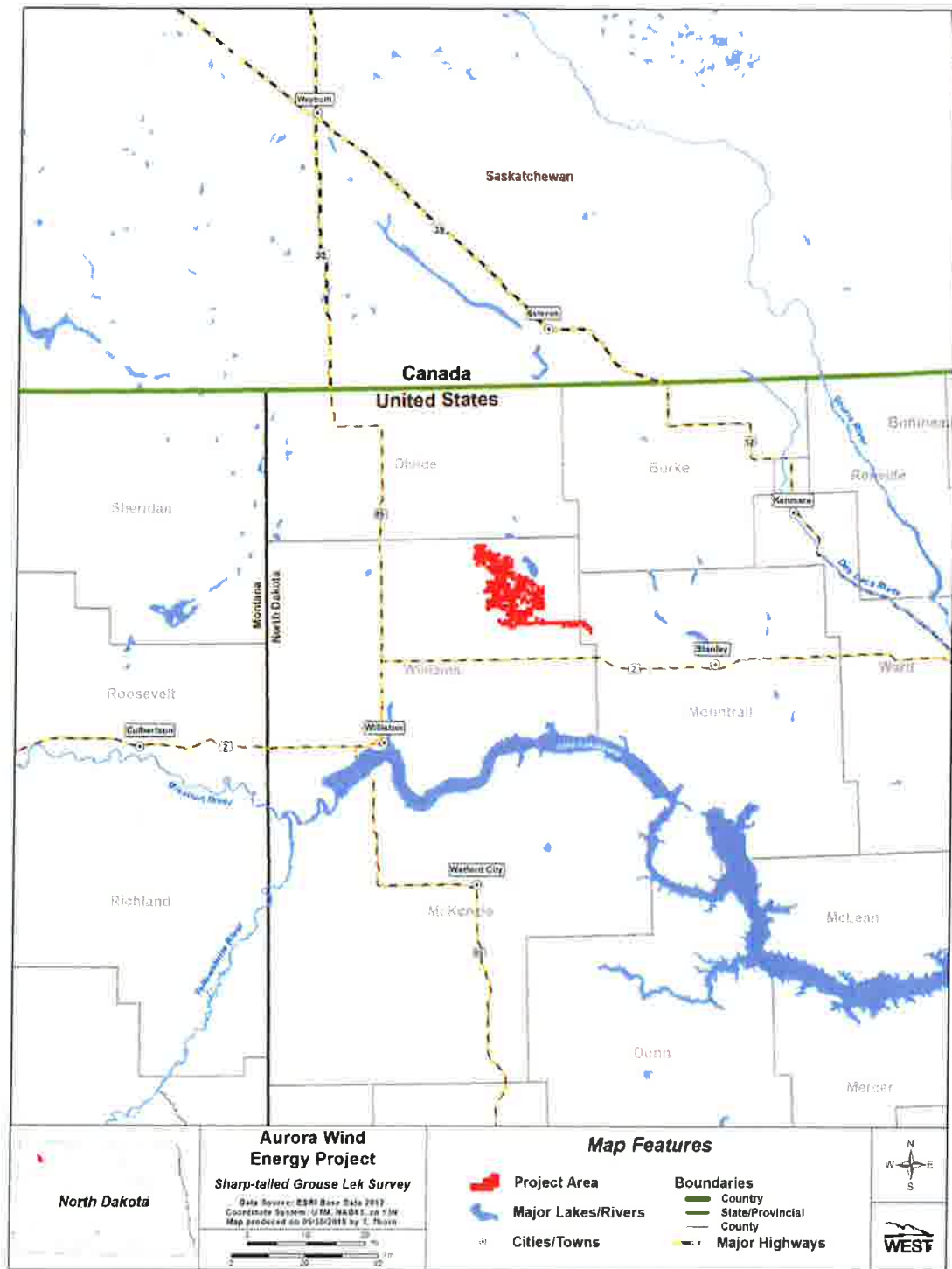


Figure 1. Location and current boundary of the Aurora Wind Energy Project in Williams and Mountrail counties, North Dakota.

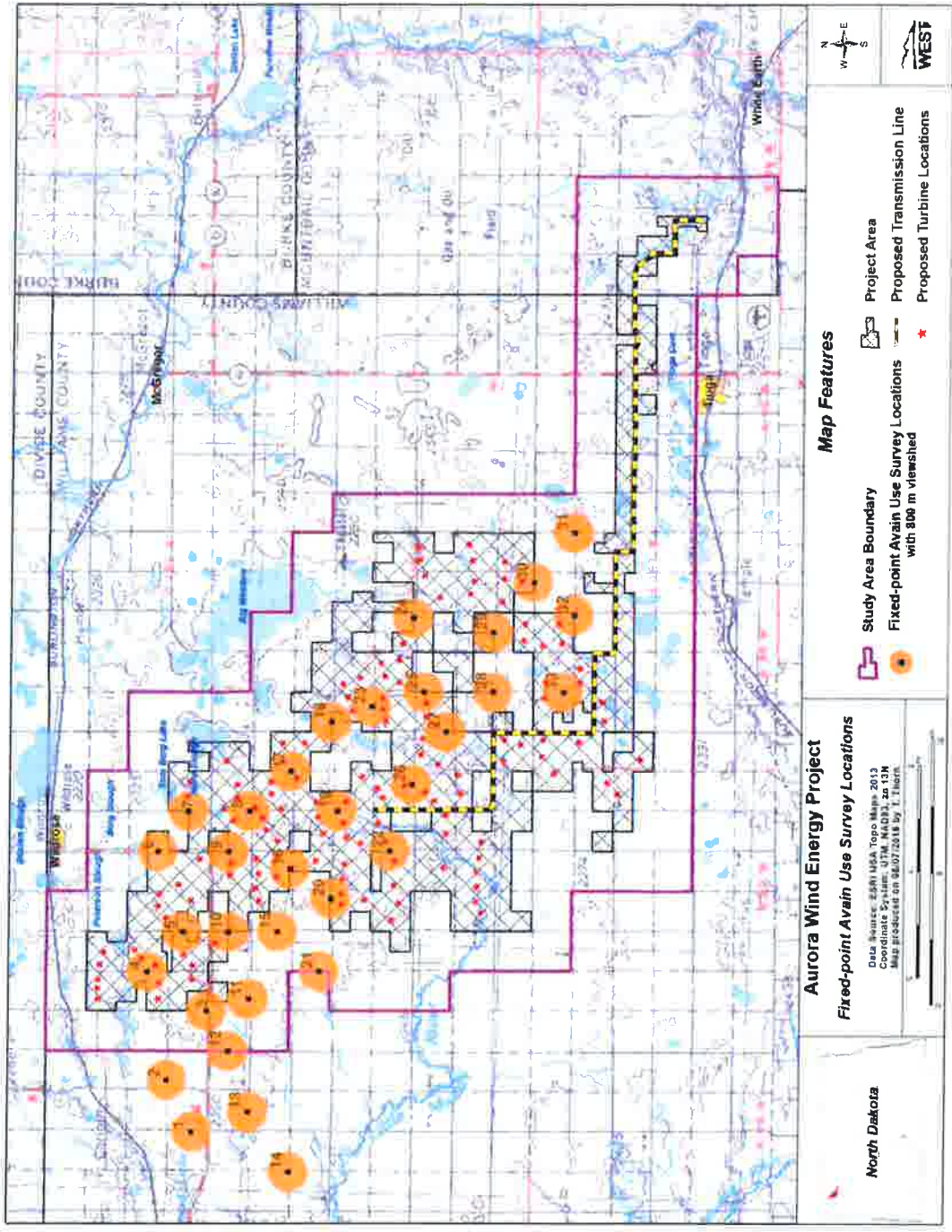


Figure 2. Fixed-point survey locations, proposed turbine locations, and proposed transmission line within the Aurora Wind Energy Project in Williams and Mountrail counties, North Dakota.

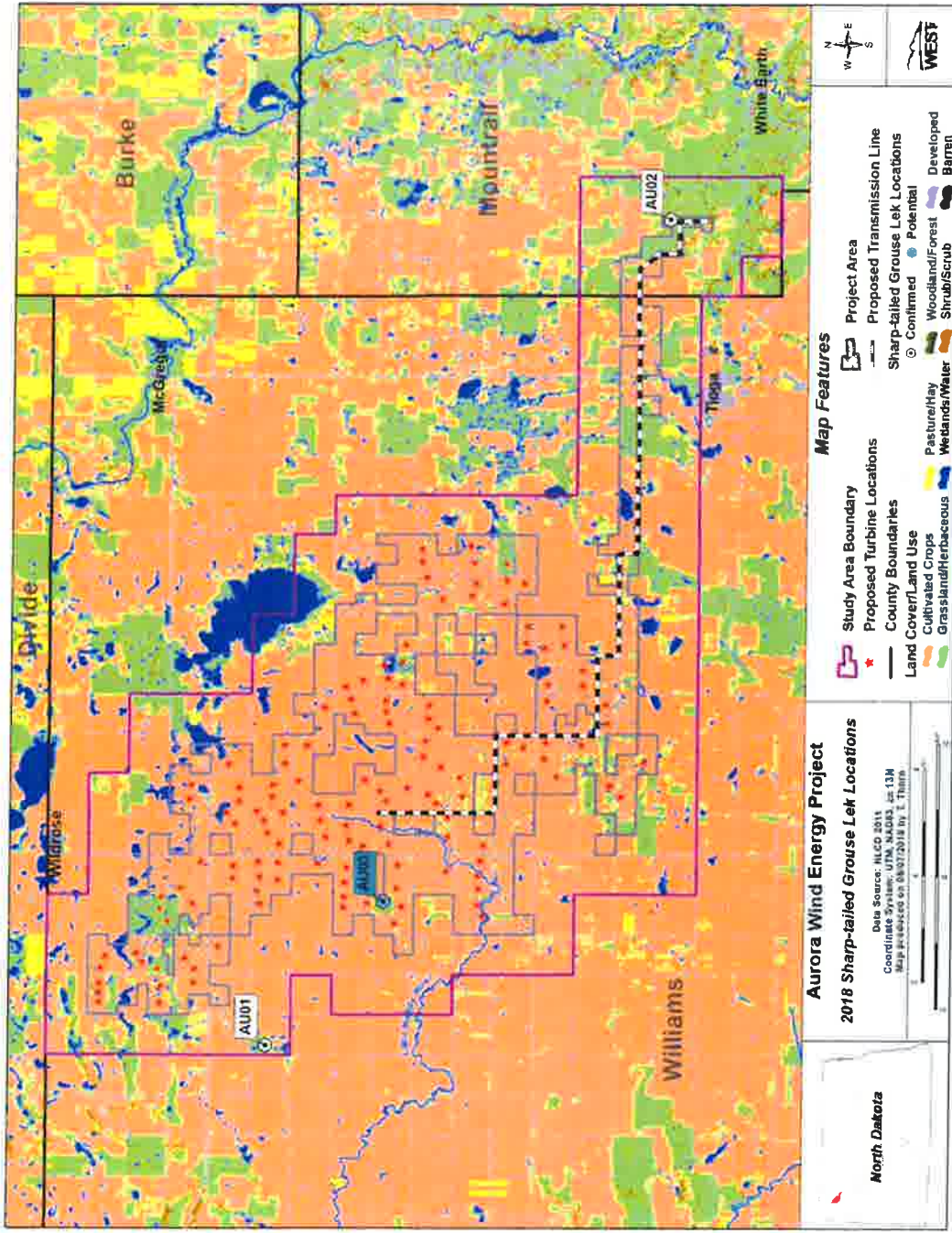


Figure 3. Sharp-tailed grouse lek locations, proposed turbine locations, and proposed transmission line within the Aurora Wind Energy Project, Williams and Mountrail counties, North Dakota.

## Jennifer Dean

---

**From:** Clayton Derby <cderby@west-inc.com>  
**Sent:** Wednesday, September 12, 2018 3:10 PM  
**To:** Kevin Shelley; Dyke, Steve (NDGF); JOHN SCHUMACHER  
**Cc:** Jennifer Dean; Katherine Moratz  
**Subject:** Aurora Wind Meeting  
**Attachments:** Aurora\_USFWS-NDGFD Meeting Notes\_081618 Final.pdf; Aurora\_Aug 16 2018\_Agency Memo Final.pdf

Hello

Attached please find meeting notes and referenced material from the Aurora Wind Project meeting held on August 16, 2018.

Thank you,

**Clayton Derby**  
**CSO / Wildlife Biologist**



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## MEETING NOTES

<b>SUBJECT:</b> Wildlife survey result update for agencies	
<b>PROJECT:</b> Aurora Wind Project	<b>MEETING LOCATION:</b> NDGFD Office
<b>MEETING DATE:</b> August 16, 2018	<b>NOTES BY:</b> K. Moratz and C. Derby

### ATTENDEES

Steve Dyke, NDGFD  
John Schumacher, NDGFD  
Elisha Mueller, NDGFD  
Kevin Shelley, USFWS  
Jennifer Dean, Aurora

Dave Iadarola, Aurora  
Haileigh Shull, Aurora  
Katherine Moratz, WEST  
Clayton Derby, USFWS

### TOPICS DISCUSSED

#### Project Overview

Dave Iadarola, Aurora Wind Project, LLC (Aurora), provided a brief review of the Aurora Wind Project (Project) location in northwestern North Dakota. The Project is mainly in eastern Williams County with approximately 3 miles of overhead transmission line that will connect to the existing Tande Substation in Mountrail County. The Project is anticipated to be up to 300MW and has obtained Conditional Use Permits in both Williams and Mountrail counties. The Project permitted up to 131 turbine locations which includes alternates. The 345 kV overhead transmission line is anticipated to be approximately 25 miles in total length. Jenni Dean, Aurora, briefly discussed a tentative timeline of the Public Service Commission (PSC) application for a Certificate of Site Compatibility (CSC) and Route Permit and hearings. At this time, the Project is targeting a mid to late September 2018 application submittal to the PSC for a CSC and anticipates public hearings to occur in January 2019. The Project noted it had received a letter from the North Dakota Game and Fish Department (NDGFD) in May 2018. To date, no correspondence has been received from the United States Fish & Wildlife Service (USFWS).

#### Tier 2 and Tier 3 Review

Clayton Derby reviewed efforts completed to date at the Project (see attached "Aurora Wind Energy Project Survey Update" memo attached and previously provided electronically to USFWS and NDGFD on August 13, 2018). This synopsis included a brief review of efforts previously discussed at the February 8, 2017, agency meeting, including the Tier 2 site characterization study, Stage 1 site assessment of eagle use and risk, and year one eagle/avian use and raptor nest surveys. Additionally, Clayton provided an update on results of the year two avian use and raptor nest surveys. Clayton also provided results of the sharp-tailed grouse lek

surveys, a survey that was conducted in response to the May 22, 2018, NDGFD letter. In response to the 2018 lek survey, the Project has moved wind turbines to be more than one mile from these lek locations. In addition, wetland and cultural work is ongoing at the Project and is largely complete based in the current design. In an effort to minimize potential risk to existing avian stopover resources, the Project has analyzed the quality of wetlands into three categories: 1) all wetlands greater than 0.5 acres in size, 2) all wetlands considered to be high quality (smaller than 0.5 acres but located in non-agricultural fields and dominated by higher quality, non-invasive wetland species, and 3) all other wetlands. The Project is currently evaluating Project infrastructure as it relates to these categories of wetlands for siting. The Project has also coordinated with USFWS's easement office three times regarding information on wetland and grassland easements in the area as the Project design has evolved.

Clayton then outlined future efforts to be conducted at the Project that will be outlined in the Project's Bird and Bat Conservation Strategy (BBCS). As additional micrositing and design changes are finalized, the Project will continue to coordinate with USFWS's easement office to note protected basins and grasslands in relation to Project infrastructure. In addition to the above siting efforts, the Project and agencies noted the location of the area in regards to the migration corridor of the Whooping crane. The Project committed to marking 100% of the overhead transmission line with bird diverters. Additional monitoring efforts to minimize potential risk to migrating Whooping cranes will be noted in the BBCS. The Project committed to sharing a draft version of the BBCS with both agencies for review and comment.

#### Discussion

Both USFWS and NDGFD asked questions regarding the efforts completed; however questions were minimal. Questions and discussion included the future development steps for the Project and the PSC process. Both agencies provided positive remarks on the siting of the Project within a fragmented landscape. All parties voiced a willingness to continue to work together as the Project continues to develop. Another agency meeting could potentially occur before the PSC hearing to discuss any additional topics regarding infrastructure placement if all parties are interested.



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**TO: USFWS and NDGFD**  
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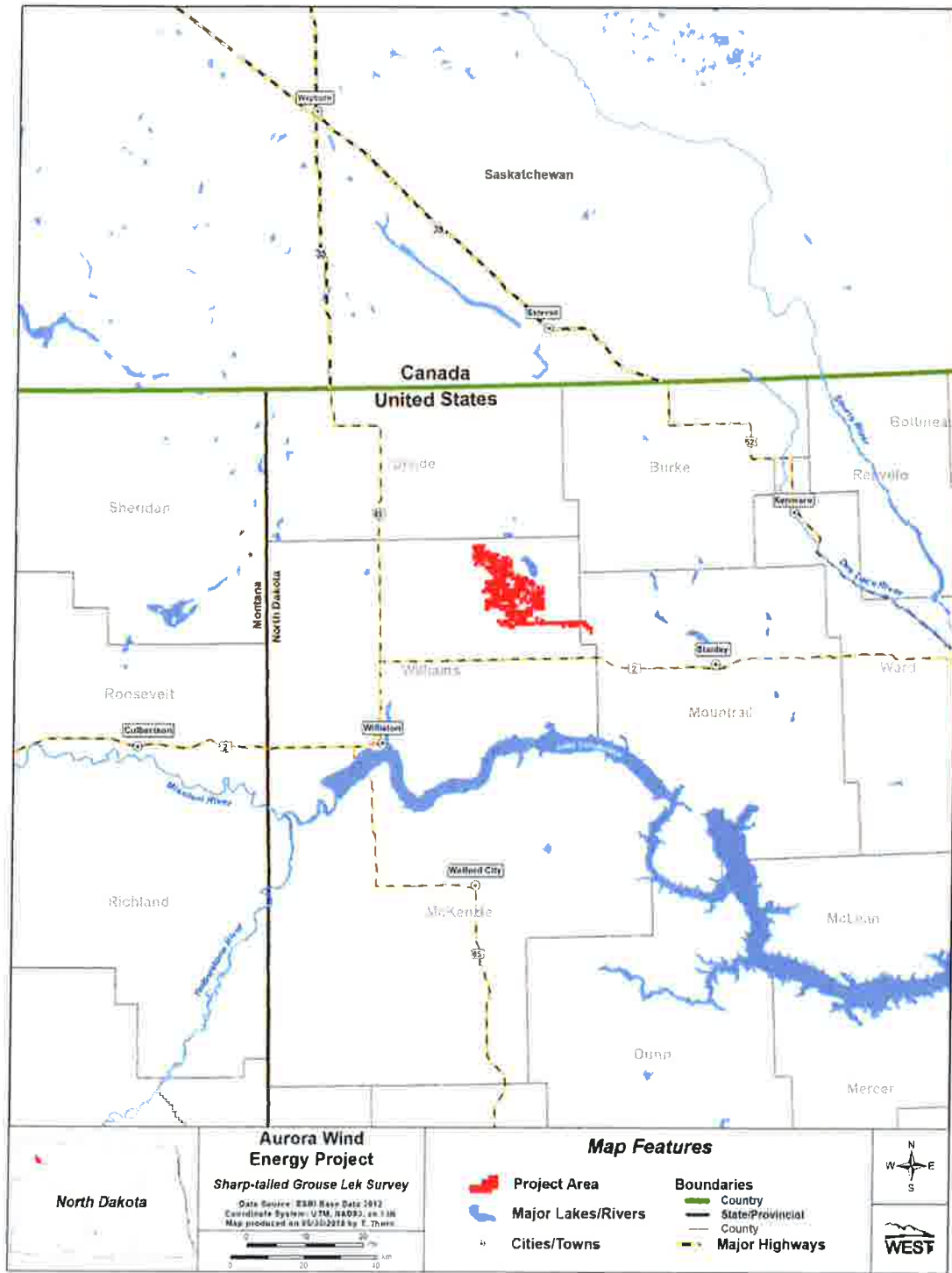


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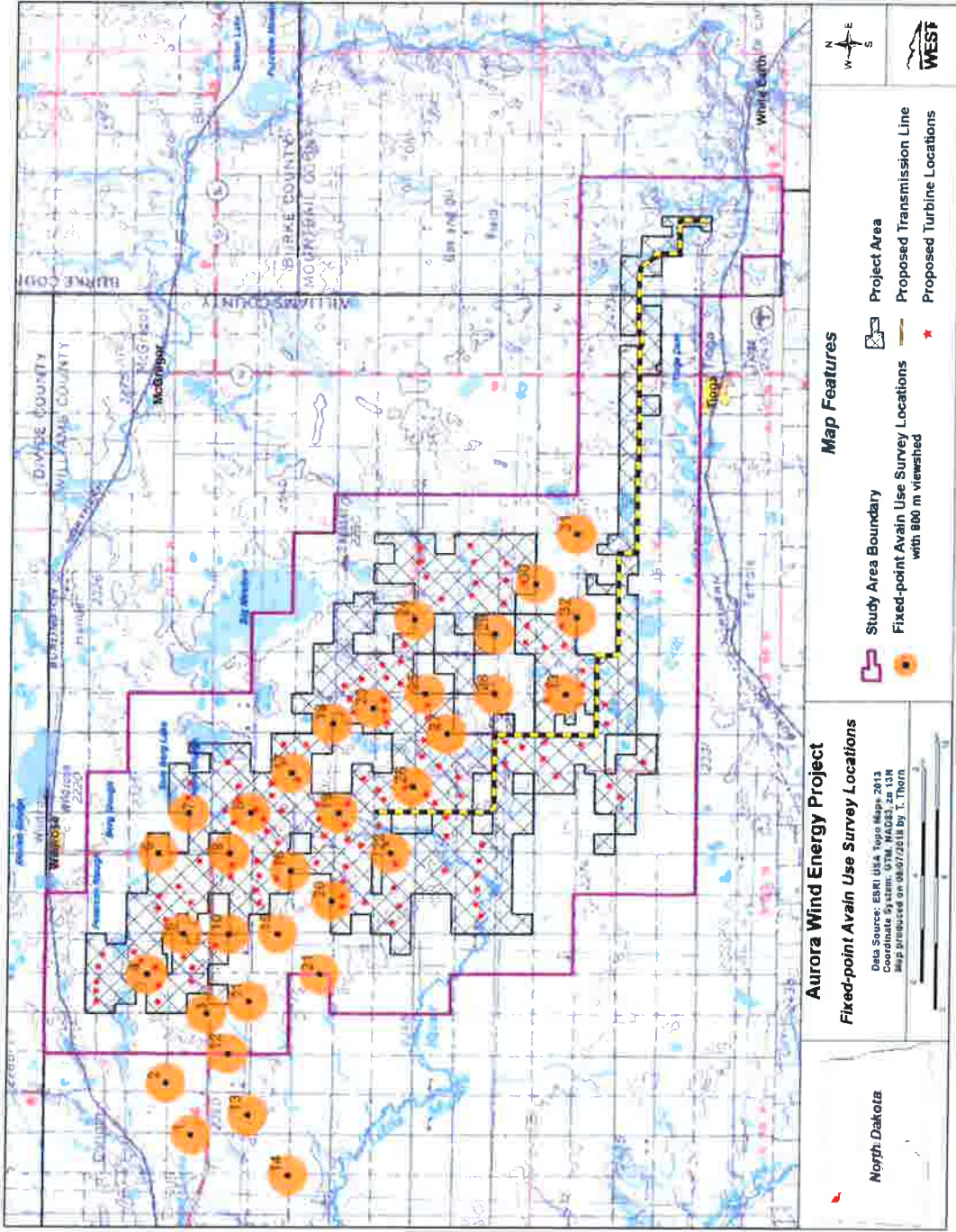


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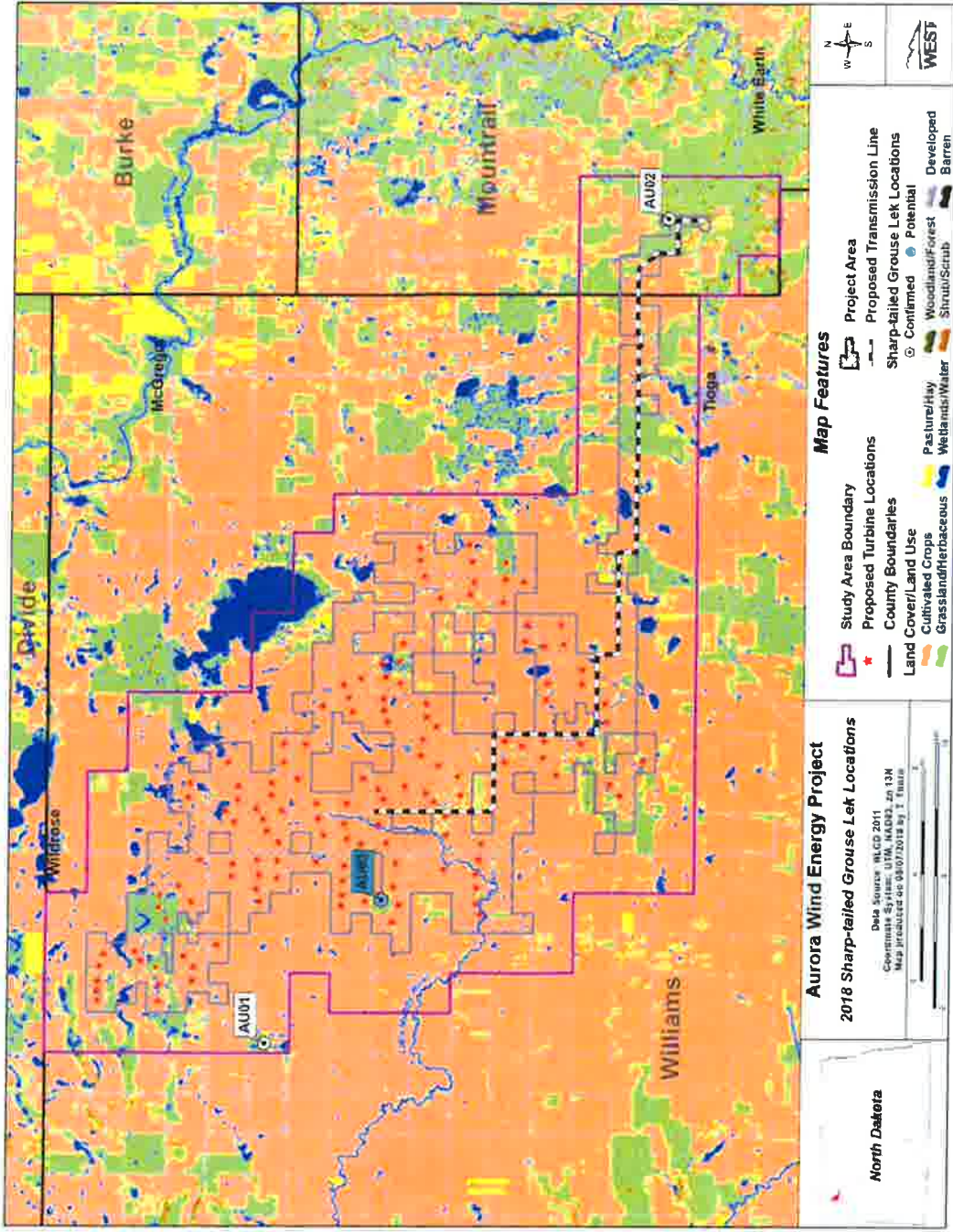


Figure 3. Sharp-tailed grouse lek locations, proposed turbine locations, and proposed transmission line within the Aurora Wind Energy Project, Williams and Mountrail counties, North Dakota.

## Jennifer Dean

---

**From:** Clayton Derby <cderby@west-inc.com>  
**Sent:** Friday, September 21, 2018 2:54 PM  
**To:** Dyke, Steve (NDGF)  
**Cc:** Kevin Shelley; JOHN SCHUMACHER; Jennifer Dean; Katherine Moratz; Scott\_Larson@fws.gov  
**Subject:** Re: Aurora Wind Meeting  
**Attachments:** Aurora\_USFWS-NDGFD Meeting Notes\_081618 Final Update.pdf; Aurora\_A031\_299.9MW--GE2.5x108\_GE2.3x13\_2018-07-26.zip

Hello Group

Steve, thank you for the suggested additions, I have put those ideas into the discussion section. The updated notes are attached for your files.

Also attached is the final layout shapefile for your review. We would be available and open to have further discussions with the group on any letter responses developed to have a "no surprises" understanding before public hearings on the PSC applications (I believe that was the term used by Steve during the meeting?).

Have a great weekend.

**Clayton Derby**  
**CSO / Wildlife Biologist**



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On Thu, Sep 13, 2018 at 2:40 PM Dyke, Steve R. <[sdyke@nd.gov](mailto:sdyke@nd.gov)> wrote:

Clayton, thanks for sharing the meeting notes. I suggest for your consideration the following items for inclusion into the meeting notes.

1. Could post construction collision survey \$ be better spent on offsets for habitat restoration efforts.
2. How there is a lack of 'vendors' in the state for habitat creation/restoration. The ND Natural Resource Trust might be positioned to help in that effort.

Additionally, while it may or may not have been discussed at the meeting, our agency strongly encourages the project sponsors provide us with the turbine locations and road alignments well before notice of a PSC public hearing on the project.

Steve

**From:** Clayton Derby <[cderby@west-inc.com](mailto:cderby@west-inc.com)>  
**Sent:** Wednesday, September 12, 2018 3:10 PM  
**To:** Kevin Shelley <[Kevin\\_Shelley@fws.gov](mailto:Kevin_Shelley@fws.gov)>; Dyke, Steve R. <[sdylke@nd.gov](mailto:sdylke@nd.gov)>; Schumacher, John D. <[jdschumacher@nd.gov](mailto:jdschumacher@nd.gov)>  
**Cc:** Jennifer Dean <[jidean@tradewindenergy.com](mailto:jidean@tradewindenergy.com)>; Katherine Moratz <[kmoratz@west-inc.com](mailto:kmoratz@west-inc.com)>  
**Subject:** Aurora Wind Meeting

**CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe.

Hello

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**Clayton Derby**

**CSO / Wildlife Biologist**

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<b>PROJECT:</b> Aurora Wind Project	<b>MEETING LOCATION:</b> NDGFD Office
<b>MEETING DATE:</b> August 16, 2018	<b>NOTES BY:</b> K. Moratz and C. Derby

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Steve Dyke, NDGFD  
John Schumacher, NDGFD  
Elisha Mueller, NDGFD  
Kevin Shelley, USFWS  
Jennifer Dean, Aurora

Dave Iadarola, Aurora  
Haileigh Shull, Aurora  
Katherine Moratz, WEST  
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#### Discussion

Both USFWS and NDGFD asked questions regarding the efforts completed; however questions were minimal. Questions and discussion included the future development steps for the Project and the PSC process. The group also discussed options for providing funds for habitat offsets instead of conducting expensive post-construction fatality monitoring studies, but agreement that currently there is a general lack of "vendors" in the state that can receive these funds and effectively implement habitat restoration or enhancement efforts. The North Dakota Natural Resource Trust may be one vendor that could be investigated to serve this purpose. Both agencies provided positive remarks on the siting of the Project within a fragmented landscape. All parties voiced a willingness to continue to work together as the Project continues to develop. Another agency meeting could potentially occur before the PSC hearing to discuss any additional topics regarding infrastructure placement if all parties are interested.