

Ruso Wind Partners, LLC
Ruso Wind Project and Gen-Tie Line
PU-19-28 and PU-19-29

Resource	Avoidance, Minimization, and Mitigation Commitments
Land Classifications	
Grasslands	<ul style="list-style-type: none"> • Conducted Grassland Assessment to identify unbroken and broken grasslands. • Updated Project Area contains only 10.8 percent grasslands (unbroken and broken), compared to 62.4 percent cultivated crops. • No Wind Project facilities sited in unbroken grasslands. • Only 0.04 acres of unbroken grasslands and 2.18 ac of broken grasslands impacted by Gen-Tie Line structures.
Wetlands	<ul style="list-style-type: none"> • Conducted desktop and field mapping survey. • Updated Project Area contains only 13.2 percent wetlands and waterbodies, compared to 62.4 percent cultivated crops. • Project facilities will avoid permanent impacts to both jurisdictional and non-jurisdictional wetlands.
Prime Farmland	<ul style="list-style-type: none"> • The Project will only impact up to 19.1 acres of prime farmland, prime farmland if drained and farmland of statewide importance, which equates to 0.24 percent of prime/important farmland within the Project that will be impacted; therefore, the impacts to prime farmland are negligible.
Wildlife	
Threatened & Endangered Species	<ul style="list-style-type: none"> • <u>Dakota Skipper</u>: Conducted habitat evaluation, which identified four habitat blocks capable of supporting all Dakota skipper life cycles. Conducted field flight surveys, during which no Dakota skippers were observed, indicating the Dakota skipper was not present. No Project facilities sited in the four potential habitat blocks. • <u>Whooping Crane</u>: Conducted habitat analysis to identify potentially suitable stopover habitat. Will install bird diverters on Gen-Tie Line within one mile of potential high usage areas. Will stop construction activities if a whooping crane is spotted in the area until it leaves the area. During migration season (late March – end of April and early October – mid November), Operations and Maintenance staff will curtail turbines when a whooping crane is within one mile of any turbine until the whooping crane leaves the area.
Eagles	<ul style="list-style-type: none"> • Conducted eagle point count surveys in 2017-18 and in 2018-19, and low bald eagle use of Project Area was recorded. No golden eagles observed. Results of surveys suggest low risk to bald eagles because of infrequent occurrence of eagles and infrequent flight at rotor height.

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Avian Species	<ul style="list-style-type: none"> • Close coordination with USFWS and NDGFD on survey type/methodology, data analysis, and avoidance and minimization measures. • Conducted pre-construction avian surveys in 2017-18, including general avian point count surveys, eagle point count surveys, aerial raptor/eagle nest surveys, and aerial and ground sharp-tailed grouse lek surveys. • All turbines set back at least one-half mile from active known leks, with all but five turbines over a mile from active known leks. • Project facilities sited at least one-half mile from active known raptor nests. • Will coordinate with NDGFD and USFWS regarding any previously unknown leks or raptor nests discovered during construction activities. • For special status avian species (USFWS BCC, species of habitat fragmentation concern, and/or NDGFD species of conservation priority), the five species accounting for approximately 74 percent of observations (lesser scaup, western meadowlark, American white pelican, Franklin’s gull, and northern pintail) have a low mean use rate. Additionally, with the exception of one species (northern pintail with a rate of 0.03), all other special status avian species had a rotor swept area encounter rate of 0 or were not observed flying at all. • Collection lines will be buried, and access roads have been sited to minimize grassland fragmentation. • Turbines sited on cropland to the extent practicable to minimize impacts on grasslands, wetlands, and wooded habitats. • A Bird and Bat Conservation Strategy (“BBCS”) will be developed for the Project prior to operation. • Will use bird flight diverters on the Gen-Tie Line and comply with APLIC standards. • Ongoing coordination with NDGFD and USFWS. • Proposed a voluntary offset package of paying \$500,000 to a third-party for conservation-related work within North Dakota to USFWS and NDGFS.
Bats	<ul style="list-style-type: none"> • Conducted pre-construction acoustic survey and will conduct bat mist-netting before August 15 2019. • Turbines sited to avoid woodland clearing. • Unlikely that Northern Long-Eared Bat is present within

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	Project Area, and will coordinate with USFWS and NDGFD if mist-netting identifies presence of species.
Cultural Resources	
Archaeological/Architectural Resources	<ul style="list-style-type: none"> • Conducted Class I investigation and Class III surveys. • Will avoid six known archaeological sites identified during surveys, with a buffer of 50 or 100 feet (depending on recommendation for specific site); temporary fencing will be installed to designate area and buffer prior to construction. • If construction activities were to occur within 100 feet of these sites or other sites identified during construction, archaeological monitoring would occur during ground-disturbing activities. • Have an Unanticipated Discoveries Plan. • Received SHSND concurrence on initial survey work and recommendations; concurrence anticipated on supplemental survey findings and recommendations.
Tribal Resources	<ul style="list-style-type: none"> • Contacted Turtle Mountain Chippewa, and its Tribal Cultural Specialist participated in 2019 Class III survey. • Turtle Mountain Chippewa Tribal Cultural Specialist agreed with initial and supplemental findings and recommended avoidance measures.
Architectural Resources	<ul style="list-style-type: none"> • Conducted Class II architectural inventory that was of SHSND-identified structures within two-mile radius of Project Area; report preparation in process.