



September 28, 2026

ND Public Service Commission
600 E. Boulevard, Dept. 4408
Bismarck, ND 58505-0408

RE: Proposed Homestead Wind Project, Williams County, ND

To whom it may concern:

The North Dakota Game and Fish Department (Department) has just been informed that an application has been submitted for the proposed Homestead Wind Project. Unfortunately, this has left little time to communicate with project proponents or to thoroughly review the application in its entirety. However, based on our initial review, The Department would like to provide the following comments.

Homestead falls mainly within areas of low value to wildlife and habitat. This is primarily due to minimal native habitats within the project boundary. We commend Apex for their initial siting of a low-risk area and making steps to avoid impacts on wildlife. However, a project cannot be evaluated based solely on its avoidance and minimization efforts alone. When impacts are not able to be avoided and occur despite determined efforts, additional attention to address and balance the specific diminution to this community's wildlife resources (reduction of production potential), as well as to reduce mounting project-by-project residual impacts overall, is recommended as basic due diligence.

First and foremost, the Department recommends avoiding all unbroken native grasslands. Native prairie is the most endangered ecosystem in North Dakota and, as we are a grassland state, many of our native species are linked to prairie. Disturbance, fragmentation, and loss of native prairie have adversely impacted a wide variety of species and these negative impacts will only continue to compound as more development takes place on the landscape. The remaining tracts of unbroken prairie are becoming more and more vital to many declining bird and pollinator species. This habitat supports 117 of the 232 Species of Greatest Conservation/Information Need identified in the North Dakota State Wildlife Action Plan (NDGFD 2025). The further loss of native prairie within the project boundary will likely have negative impacts on these rare and declining species, and avoiding disturbance to this important habitat is recommended. Further, grasslands are essential for sharp-tailed grouse nesting and brood rearing. The Department recommends that no turbines be placed within any grassland, unbroken or restored, within 2 miles of a lek.

Based on the layout provided by Apex in March 2026, the project as a whole will impact approximately 475 acres of native grassland and displace 189 duck pairs. These estimates were calculated by using the best science available to North Dakota- estimating a reduction in grassland nesting birds and breeding duck pairs due to wind development. To offset this impact, the Department recommends Apex replace 252 acres of grasslands and 26 seasonal wetlands.

The Department recommends any commitment to offsetting impacts be put into the Bird and Bat Conservation Strategy prior to permit approval.

Thank you for the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Kreft", written over a light gray rectangular background.

Bruce Kreft
Chief, Conservation and Communications Division