

## EIS Scoping- Missing, Incomplete, or Unsupported Components

- **NEPA applicability and status (lead agency, class of action, EA/EIS/FONSI):** Not discussed. The application identifies several federal permits/authorizations (FAA determinations, potential USACE Section 404 and state 401 WQC, USFWS ESA authorizations) but does not state whether a federal lead agency will prepare a NEPA document, whether actions are categorically excluded, or whether an EA/EIS is anticipated. This is a gap for a comprehensive EIA crosswalk when federal approvals create a NEPA nexus. <sup>1</sup>
- **Alternatives analysis depth (including “no action”):** The siting alternatives narrative addresses site screening and brownfields impracticability but does not present a full alternatives matrix including the no-action alternative, layout alternatives analysis with quantified comparative impacts, or technology alternatives beyond the selected turbine model. The AFR-level discussion indicates equal weighting and narrative rationale but limited comparative environmental consequences across alternatives.
- **Cumulative impacts analysis (project-wide):** No discrete, integrated cumulative impacts section assessing combined effects with other past, present, and reasonably foreseeable projects. Topic sections describe localized/minimal impacts, but a cumulative analysis consistent with federal practice is absent. <sup>1</sup>
- **Environmental justice (EJ) screening and analysis:** No EJ identification, screening, or discussion of potential disproportionate impacts on minority/low-income or sensitive populations, nor description of targeted outreach to such communities. Socioeconomic content focuses on revenues/jobs and general outreach, with no focus on loss of value or revenue by altering the viewscape and threatened recreational activities.
- **Air quality (construction emissions) and GHG/climate discussion:** The filing commits to erosion/stormwater controls and SPCC but does not quantify construction air emissions (e.g., NOx/PM from heavy equipment, fugitive dust) or discuss GHG emissions or climate considerations that are often addressed in federal EIAs/NEPA documents. No conformity or significance discussion is provided.
- **Wetland/Waterway impacts—final quantification and field verification:** The application presents a robust methodology and preliminary impact estimates, but several determinations are deferred: many collector crossings and five bore pits rely on conservative desktop delineations pending spring 2026 field verifications, and one access road alignment (to T-16) relies on desktop delineation. Final wetland/waterway impacts and matting locations are therefore incomplete at filing; commitments to avoid/shift are made, but final acreages and crossing details are “to be confirmed”.

- **Low-water crossings design detail and hydrologic connectivity:** Two permanent “low-water crossings” in wetlands (301-W02 and 111-W02) will be constructed with fill and “not vented or culverted,” with a general statement that cross-drainage pipes will be installed to maintain connectivity. Detailed hydraulic design criteria, sizing, and demonstration of no adverse hydrologic impacts to wetlands are not provided at this stage; reliance on later plan submittals leaves the analysis incomplete for final impact assessment.
- **Post-construction wildlife monitoring plan specificity:** The document states post-construction monitoring may occur depending on risk level and references USFWS guidelines but does not include a defined, project-specific post-construction monitoring protocol (survey methods, duration, triggers) or adaptive management thresholds. Bat curtailment is tied to BITP/HCP pathways, but concrete monitoring commitments remain general.
- **Shadow flicker—compliance demonstration for non-participants above 20 hours:** Modeling shows up to 18 (proposed-only) or 35 (proposed + alternates) non-participant receptors exceeding 30 hours/year; the text states the final layout will be designed to comply and references curtailment and SFM-V4.0. However, it does not present a specific compliance layout or a receptor-by-receptor mitigation plan to ensure Wis. Admin. Code § PSC 128.15 limits (and 20-hour mitigation threshold) are met at the time of approval; thus compliance is prospective rather than demonstrated.
- **Noise—final compliance across final layout and operational modes:** The modeled 47-turbine configuration shows compliance; exceedances only arise when alternates are combined. Because turbine selection and exact final siting are pending, and certain combinations would exceed nighttime limits, the document recommends final modeling. A firm, final compliance demonstration tied to a fixed layout is not yet in the record.
- **Cultural resources—field surveys not complete:** The filing identifies sites and pledges avoidance; five resources intersect preliminary collection routes. Field investigations to refine/confirm impacts are scheduled for Q3 2026. Until those surveys and any WHS consultations are complete, the cultural resources impact assessment is incomplete for final approvals that depend on confirmed APE and avoidance/mitigation.
- **Traffic management—final haul route analysis and specific road modifications:** The plan commits to complete a haul route analysis and negotiate operating/road use agreements later; specific intersections/road segments for widening, line drops, or tree clearing are not finalized, leaving transportation impacts partially undefined pending final engineering and manufacturer selection.
- **Contaminated sites—protocols tied to construction footprint:** While WRRD sites are listed (mostly closed), no project-specific inadvertent discovery/management protocol (e.g., soil handling, dewatering in contaminated areas) is detailed beyond

general SPCC/ECSWMP commitments. Given identified sites within two miles and a few within the project area, a defined plan would strengthen the EIA; as filed, treatment is general. <sup>1</sup>

- **Socioeconomic analysis—housing, community services, EJ:** Socioeconomic effects are framed around revenues and jobs; potential impacts to housing availability, community services demand during construction, or EJ communities are not analyzed. Public health outcomes are not separately evaluated beyond noise/shadow/EMF discussions.
- **Climate resilience/adaptation:** No discussion of resilience of project infrastructure to increasing extreme precipitation/winds or adaptation measures; floodplain discussion is limited to siting outside 100-year areas and minimal road/collection presence.
- **Greenhouse gas accounting for construction or net system benefits:** The record provides energy output and capacity factor but does not address GHG emissions reduction benefits or construction emissions accounting; while not a state AFR requirement, it is commonly addressed in federal NEPA reviews and comprehensive EIAs.
- **NEPA agency coordination record:** Although permit tables list federal contacts and statuses, the record does not identify a federal lead or cooperating agencies or aggregate the status of federal consultations in a NEPA context. NTIA “Letter of Concurrence” is “in progress,” but implications for NEPA are not discussed.