



**DEPARTMENT OF  
NATURAL RESOURCES**

Minnesota Department of Natural Resources  
Division of Ecological & Water Resources  
500 Lafayette Road  
St. Paul, MN 55155-4040

February 21, 2018

[Electronic Submittal]

Tricia DeBleeckere  
Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul MN 55101

RE: In the Matter of the Site Permit Amendment Application for Repowering the Trimont Wind I Project in Martin and Jackson Counties

Public Utilities Commission Docket Number: IP6907/WS-13-258

Dear Ms. DeBleeckere,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application for repowering the Trimont Wind I project in Martin and Jackson counties. Our agency offers the following comments and recommendations:

Wind Access Buffers

Page 12 indicates that 21 turbines would not meet the wind access buffer setback (Table 7). Trimont Wind is requesting an adjustment to the wind access buffer requirements to allow 21 turbines to operate without additional site control. Wind access buffers are designed to protect the wind rights of non-participating landowners. Many of those landowners are non-participating because they did not want the project on or near their land. The increased blade length will be more visible to adjoining non-participating landowners.

Increasing the turbine height, rotor diameter, and rotor swept zone at repower sites is likely to increase bat fatalities within Minnesota, especially when they are located near suitable habitat. Cumulative bat fatalities are increasing at an alarming rate due to the boom in wind development in recent years. The DNR, as a non-participating landowner on wind projects, does not support exemptions to wind access buffers being applied to DNR administered Lands.

As turbines continue to increase in height and rotor diameter, it is important to consider at what distance an exemption is acceptable to non-participating landowners, both now and in the future. Perhaps new wind projects need an increased wind access buffer to account for future repowering. The DNR recommends that the Commission establish a clear policy on exemptions to existing (permitted) wind access buffers before allowing them on any project.

### Wetland Permitting

Page 14 states, "In areas of potential construction disturbance a wetland delineation will be conducted. If temporary or permanent impacts to wetlands or waters may occur due to retrofit construction, then those impacts will be permitted with the applicable agencies (U.S. Army Corps of Engineers (USACE), Department of Natural Resources (DNR), Jackson or Martin County Soil and Water Conservation District (SWCS)." The language should be changed from "then those impacts will be permitted" to "then a permit application will be submitted" with the applicable agencies.

### Turbine Feathering

Page 16 states, "Trimont Wind implements a voluntary strategy of feathering/pause-to-cut-in for turbines at wind speeds up to three meters/second (m/s), from one-half hour before sunset to one-half hour after sunrise, between July 15th and October 15th, when temperatures are over 50 Fahrenheit." The DNR recommends that the current feathering language used for new site permits granted by the Public Utilities Commission also be used for the Trimont Wind I repowering project. The current language reads as follows: "The Permittee shall operate all facility turbines so that all turbines are programmed to be locked or feathered at wind speeds up to the manufacturer's standard cut-in speed, from one-half hour before sunset to one-half hour after sunrise, from April 1 to October 31 of each year of operation through the life of the project."

Using the same feathering approach for new and repower projects will ensure consistency, provide uniform treatment among wind companies, and further reduce bat fatalities. Reducing bat fatalities at previously permitted project sites is essential because the cumulative bat fatalities from all operating turbines has increased to a level that has the potential to negatively affect bat populations on a long-term basis.

The DNR appreciates the opportunity to review the Site Permit Amendment Application for Repowering the Trimont Wind I Project. Please feel free to contact me at 651-259-5078 with any questions.

Sincerely,



Cynthia Warzecha  
Principal Planner

CC: David Birkholz, Minnesota Department of Commerce - EERA  
Adam Sokolski, Trimont Wind I / Avangrid Renewables  
ERDB #20180258