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December 16, 2021

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

RE: In the Matter of the Application of Zephyr Wind, LLC for an Amendment to the Site Permit for the Community Wind South Repower Project in Nobles County, Minnesota

PUC Docket Number: IP-6871/WS-11-863

Dear Advisor,

On November 5th, 2021, the Minnesota Public Utilities Commission (PUC) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information Meeting and Comment Period on the application of Zephyr Wind LLC (Community Wind South, applicant) for their proposed Large Wind Energy Conversion System (LWECS) site permit amendment. The Minnesota Department of Transportation (MnDOT) has reviewed the information regarding the Site Amendment Application and submits the following comments in response to the Notice.

In addition to comments previously provided to the Applicant and included in Appendix F3 of the amended application, MnDOT offers these additional comments for consideration.

With any repower/upgrade wind project, existing turbine locations in proximity (minimum 250-foot setback) to state trunk highway right of way warrant concern regarding the proposed height increases as they relate to the safety of the traveling public in the project area. MnDOT believes these proposed height changes should be taken into consideration when reviewing the potential human and environmental impacts of this project and not solely as they apply to our agency's concerns. For this project, none of the existing turbines are near state trunk highway right of way and therefore, do not present any concerns for MnDOT at this time.

On Page 3 of the Application, it states that "some minor upgrades to the electrical collection system may be needed to support the higher capacity turbines." In email exchanges with the Applicant, MnDOT has been made aware that there are no planned changes to the collection line crossing of MnDOT trunk highway (TH) 266. Should this information change and upgrades to lines affecting MnDOT right of way be needed, the Applicant will need to work with MnDOT District 7 staff on applicable utility permits for those changes. Additionally, any state highways or state highway intersections that will need minor upgrading or modifications to deliver new equipment, or haul replaced equipment, would require the same coordination. It should be noted that all utility permit applications are subject to review by our Office of Environmental Stewardship which could result in additional permitting criteria and/or a request to move the line outside of any significant area of environmental concern.

As always, the Applicant should familiarize themselves with MnDOT construction projects within the project and anticipated delivery areas. Future state projects for this area can be found by visiting: [MnDOT District 7 Projects](#). Because MnDOT's highway construction activities could impact the Applicant's plans to haul oversize loads to the proposed site, the Applicant will need to coordinate with MnDOT when planning such loads.

Any MnDOT permits applied for as a part of the Community Wind South Repower Project will not be issued until the PUC has issued an approved, amended Site Permit for this project. All applicable permitting, traffic control and construction coordination efforts should be made through Marc Fischer, Engineering Specialist in the District 7B Permits Office at 507-822-2191 or Marc.Fischer@state.mn.us. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT owned property.

MnDOT has a continuing interest in working with the PUC, the DOC EERA and the Applicant to ensure that possible impacts to the entire state trunk highway system, traveling public and environmentally significant areas of concern are adequately addressed.

Thank you for the opportunity to provide these comments.

Sincerely,

Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management
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cc: Marc Fischer, Angela Piltaver– District 7B Permits/Planning

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