

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

December 2, 2025

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

**RE: In the Matter of Wisconsin Power & Light Company's Site Permit Application for a Large Wind Energy Conversion System of up to 153 MW in Freeborn County, Minnesota
Docket Number: IP-7145/WS-24-349**

Public Advisor,

The Minnesota Department of Natural Resources (DNR) has reviewed Wisconsin Power and Light's (Applicant) site permit application and the draft site permit (DSP) for the up to 153 MW Bent Tree Wind Project (Project) in Freeborn County. Our agency offers the following comments regarding the site permit and DSP.

Bird and Bat Conservation Strategy

The Bird and Bat Conservation Strategy (BBCS) included in appendix G of the site permit application does not include a post-construction fatality monitoring plan. A robust post-construction fatality monitoring plan will be necessary to assess bird and bat fatalities at this site. Our agency advises that all wind projects in Minnesota are currently required to conduct post-construction fatality monitoring for a minimum of two days per week for two years. The DNR recommends the BBCS includes a thorough discussion of adaptive management strategies, such as operational curtailment, that may be used if high avian and or bat fatalities are reported. If avian or bat fatalities are high, it is our agency's expectation the Applicant will work with the DNR and the Commission to employ measures to reduce fatalities. If mitigation measures are necessary, additional monitoring will be needed to assess their effectiveness.

State-listed Species

The DNR supports a special condition to require the Applicant to complete coordination with the DNR regarding rare species, including following the stated avoidance measures and the Takings Permit

process if needed, before Project activities begin. Our agency proposes the following special condition to ensure compliance with state endangered species laws: *The Permittee will comply with applicable Minnesota Department of Natural Resources requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134). The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.*

Dust Control

The DNR supports special condition 6.1 directing the Applicant to use non-chloride dust suppression products during construction as written in the DSP.

Wildlife-Friendly Erosion Control

The DNR supports special condition 6.2 directing the Applicant to use wildlife-friendly erosion control materials as written in the DSP.

Facility lighting

The DNR supports special condition 6.3 of the DSP requiring shielded and downward facing lighting as written in the DSP.

Snowmobile Trails

The DNR supports special condition 6.4 as written in the DSP.

The DNR appreciates the opportunity to comment on the Bent Tree Wind Project. Please contact me if you have questions.

Sincerely,

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CC: Haley Byron, Minnesota DNR
Equal Opportunity Employer