

m DEPARTMENT OF
NATURAL RESOURCES

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

Electronic Submittal

April 13, 2018

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 supplemental information for the site permit application for repowering the Trimont Wind I project in Martin and Jackson counties. Our agency has also reviewed the applicant's assessment of impacts to known occurrences of rare features. It is important to acknowledge that, although the Natural Heritage Information System (NHIS) does not identify records of bats in the vicinity of the project, all seven of Minnesota's bats can be found throughout Minnesota. The northern long-eared bat (*Myotis septentrionalis*), tricolored bat (*Perimyotis subflavus*), big brown bat (*Eptesicus fuscus*), and little brown bat (*Myotis lucifugus*) are all state-listed species of special concern and are vulnerable to further population declines.

Given the proximity of proposed turbines to stream corridors, which may provide bat habitat, the DNR recommends that the feathering language used for new site permits granted by the Public Utilities Commission (Commission) also be used for the Trimont Wind Repower. The Commission's current permitting language states, "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.

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

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Warzecha".

Cynthia Warzecha
Energy Projects Planner

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