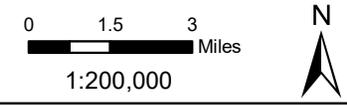
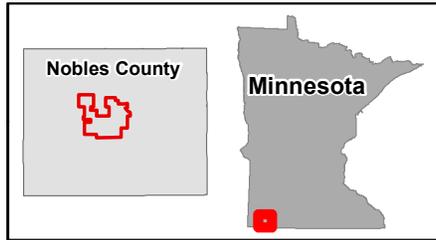
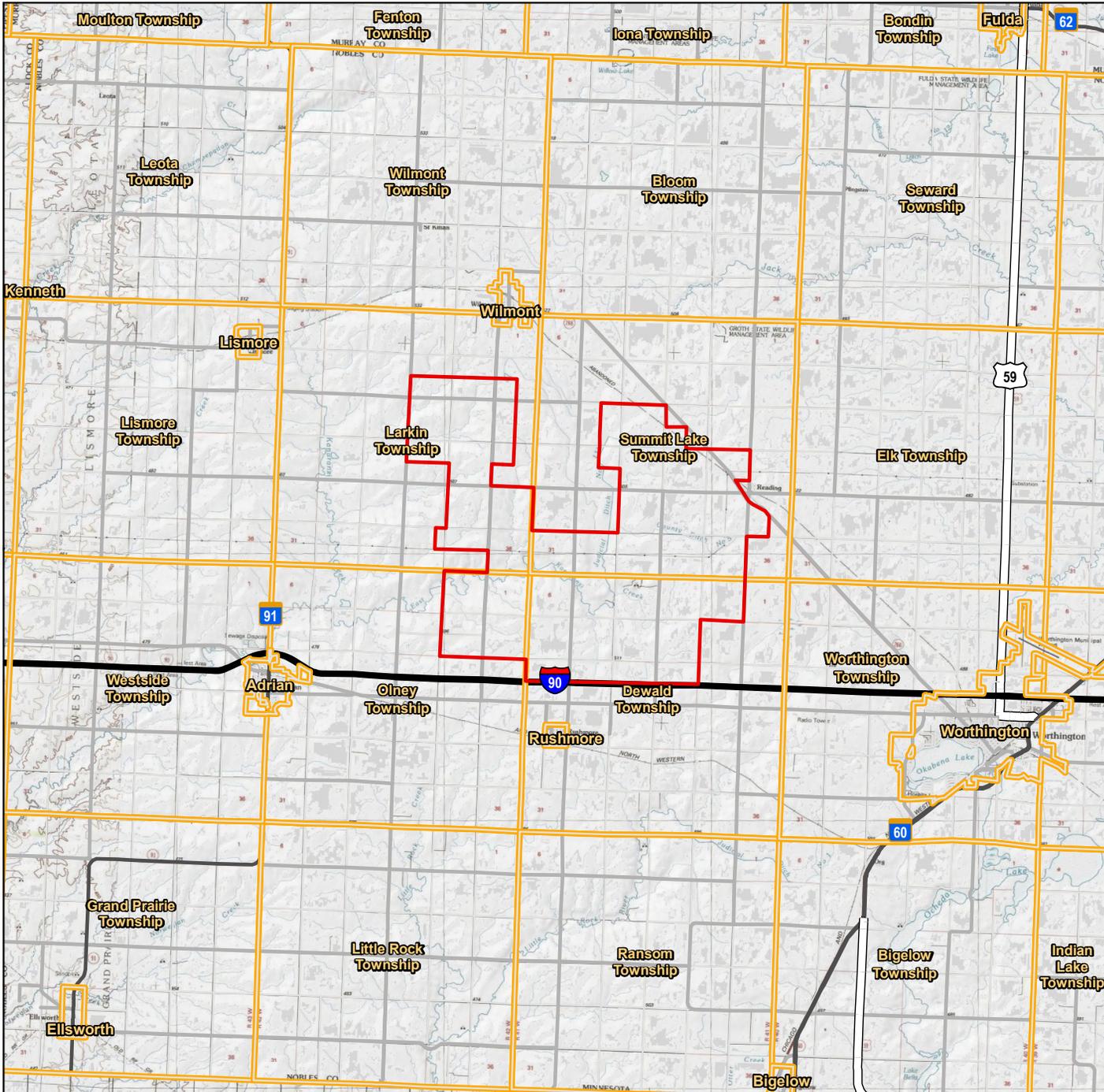


NONPUBLIC DATA - NOT FOR PUBLIC DISCLOSURE



-  Project Boundary
-  City/Township

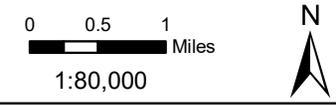
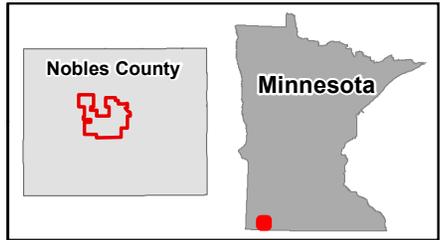
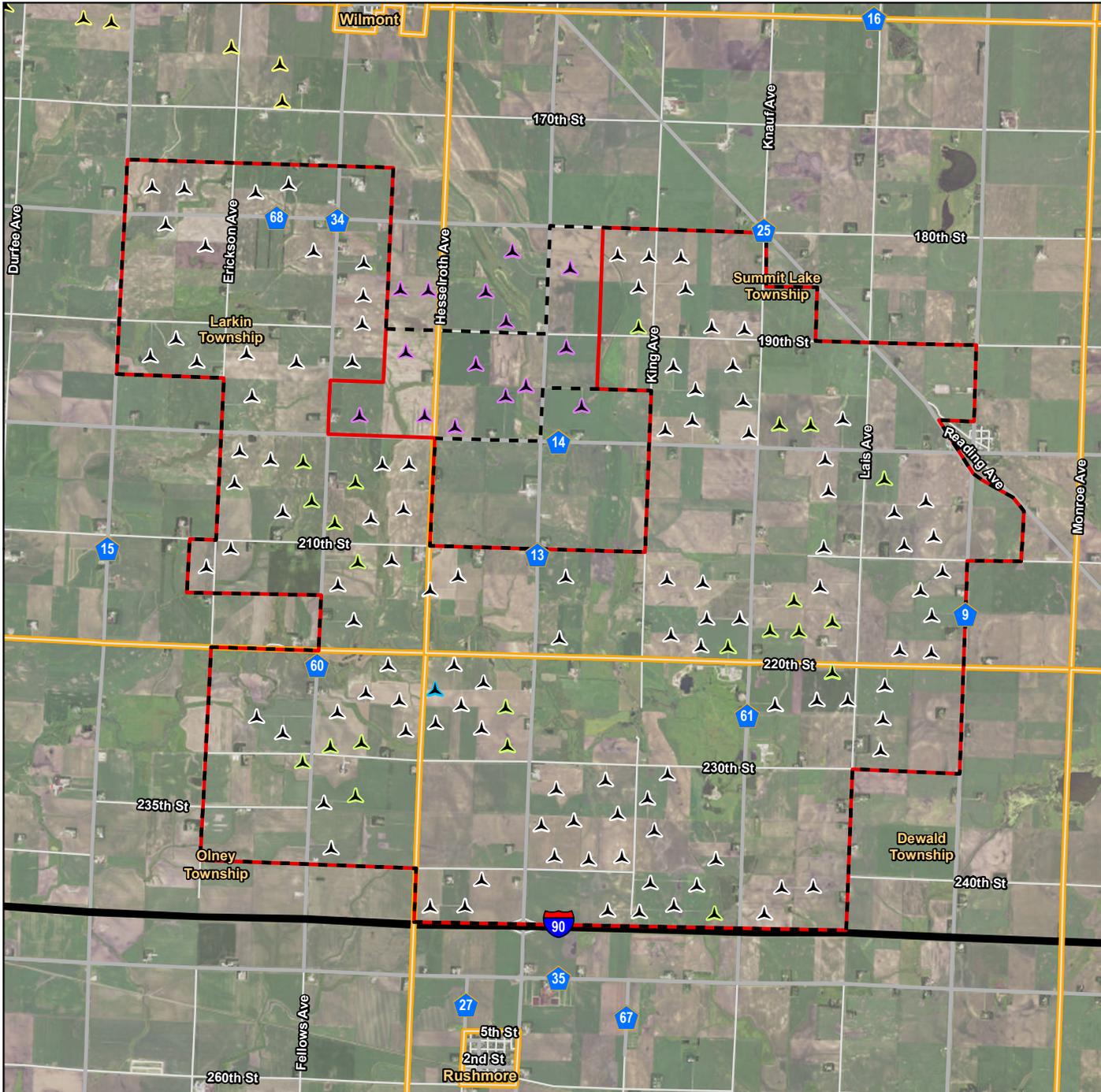
Data Source: Xcel Energy, US Census, MDOT, USGS

Figure 1
Project Location
Nobles Repower Project
Nobles County, Minnesota



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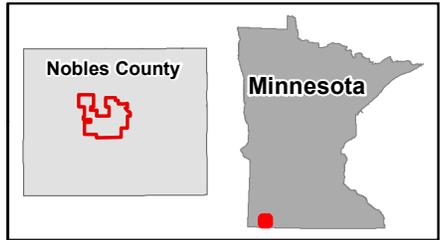
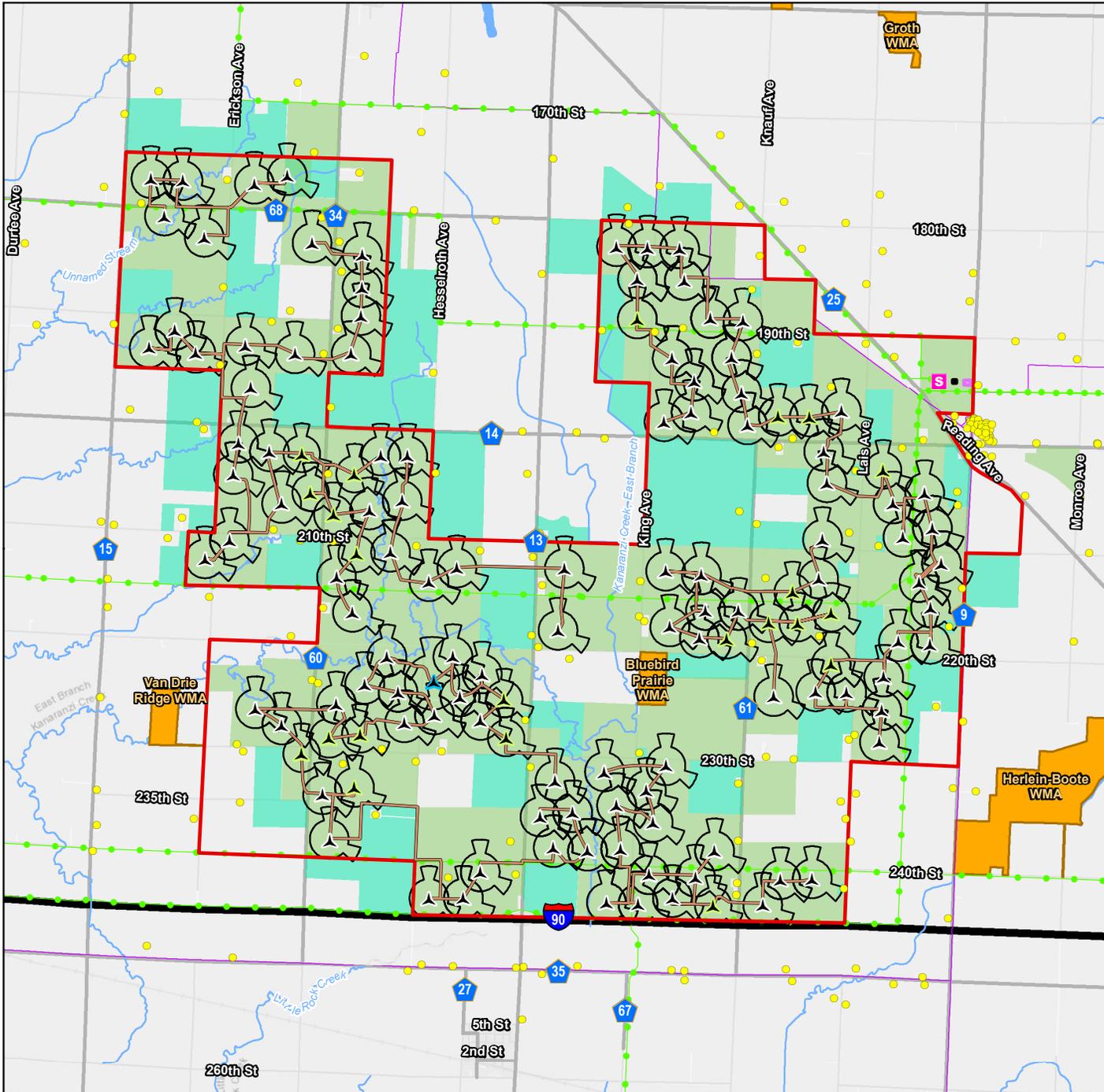
- Turbine (91m rotor diameter)
- Turbine (97m rotor diameter)
- Turbine (136m rotor diameter)
- Community Wind South
- Existing Wind Project
- Project Boundary
- 2009 Project Boundary
- City/Township

Data Source: Xcel Energy, US Census, 2019 NAIP

Figure 2
Project Boundary
Modification
Nobles Repower Project
Nobles County, Minnesota



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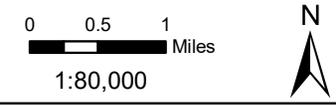
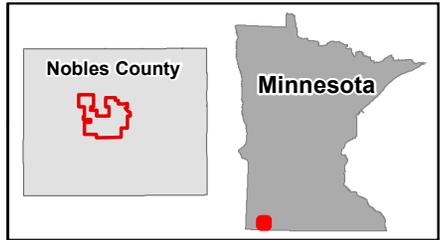
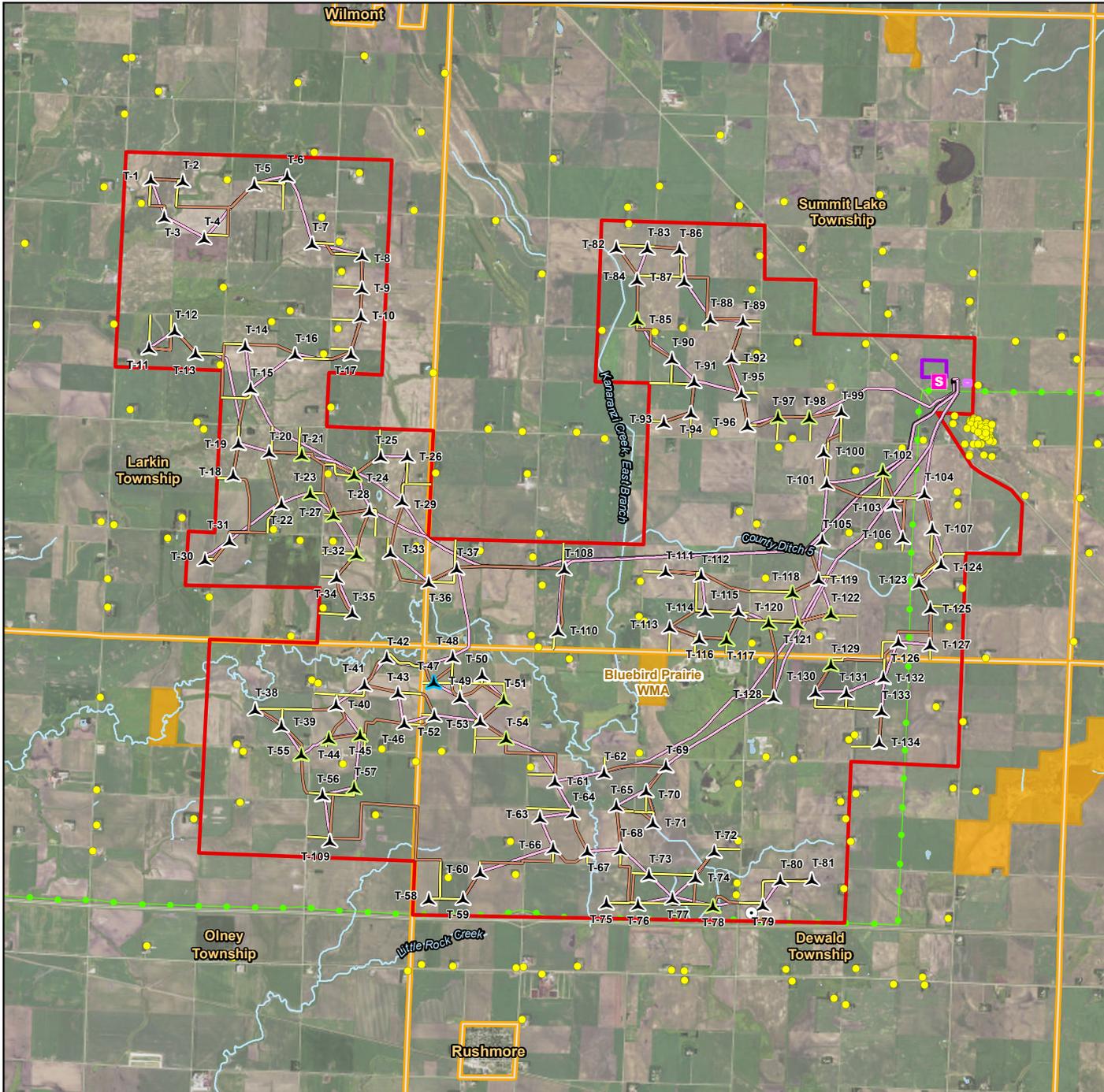
- Turbine (91m rotor diameter)
- Turbine (97m rotor diameter)
- Turbine (136m rotor diameter)
- Residential Structure (within 1 mile of Project Area Boundary)
- Existing Substation
- Project Boundary
- O&M Area
- Project Substation
- Proposed Crane Path
- Snowmobile Trail
- Existing Transmission Line
- Public Water Watercourse
- Existing Lease Agreement
- Wind Rights Only (in process)
- Wildlife Management Area (WMA)
- Public Water Basin

Data Source: Xcel Energy, US Census, MDT, USGS

Figure 3
Wind Access Buffer
Setbacks
Nobles Repower Project
Nobles County, Minnesota



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- Turbine (91m rotor diameter)
 - Turbine (97m rotor diameter)
 - Turbine (136m rotor diameter)
 - Residence (within 1 mile of Project Boundary)
 - Permanent Met Tower
 - Nobles County Substation
 - Proposed Crane Path
 - Access Road
 - Collection Line
 - River/Stream
 - Existing 345 kV Transmission Line
 - Project Boundary
 - O&M Area
 - Project Substation
 - City/Township
 - Laydown Area
 - Lake, Pond or Reservoir
 - Wildlife Management
- Data Source: Xcel Energy, US Census, MDOT, MDNR, 2019 NAIP

Figure 4
Project Area and
Facilities

Nobles Repower Project
Nobles County, Minnesota

Xcel Energy
RESPONSIBLE BY NATURE

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Division of Ecological & Water Resources
Region 4 (Southern Region)
21371 Highway 15 South
New Ulm, MN 56073

December 2, 2020

Matthew Langan
Excel Energy
Matthew.A.Langan@xcelenergy.com

Subject: DNR Early Coordination Comments for Nobles Wind Repower

Dear Matthew,

This letter includes DNR's early coordination review comments of the proposed Nobles Wind Repower project in response to a 11/2/20 review request and shapefile project information received 11/4/20 (footprint and turbines) and 11/20/20 (crane paths). The proposed project, located in central Nobles County, is to retrofit 134 turbines with larger rotors and different nacelles to increase energy yield and extend the life of the project. The originally permitted wind towers, access roads, and collection lines will be used, but road/intersection upgrades and temporary impacts including crane paths and a laydown yard will occur. This project is located along the peak of the Prairie Coteau, a substantially wind-developed area within Minnesota. This is a high priority conservation region in the [MN Wildlife Action Plan](#), the [MN Prairie Conservation Plan](#), and the [Missouri River One Watershed One Plan](#).

General Guidance and Recommendations

The project should review and integrate the [MNDNR Guidance for Commercial Wind Energy Projects](#). Several natural resource GIS data layers are available on the [Minnesota Geospatial Commons](#) including Native Plant Communities, Public Waters, and MBS Sites of Biodiversity Significance to assist in your project planning. Additional resources are also available from conservation groups such as the [The Nature Conservancy's Site Wind Right](#). Since most of the project components are already in place, most avoidance strategies apply to the temporary impacts associated with the project.

The Public Utilities Commission (PUC) protects non-participating landowners through the wind access buffer of 5 rotor diameters (prevailing wind direction) and 3 rotor diameters (non-prevailing wind direction). The only public land identified within the project footprint is Blue Bird WMA (Herlein-Boote and Van Drie Ridge WMAs are just outside of the project footprint area). At about 0.2 miles to the closest turbine, we are not identifying any issues with this setback in regards to State owned lands, but ensure this requirement is met for private lands as well.

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NHIS Review, Rare Species, and Habitat Protection

The MNDNR recommends or requires (depending on the specific type of species/community impact) avoidance of rare species, communities, and features in accordance with [Minnesota Rules Chapter 6134](#). A Natural Heritage Information System (NHIS) review provides direction on these rare species/communities. The NHIS review must be completed and plans to avoid impacts should be in place prior to submitting the PUC application. The NHIS review can be requested using the form on the [NHIS review webpage](#). The NHIS review results are valid for one year. Please note that generally the DNR prefers for NHIS reviews to proceed early coordination review. As such, some NHIS issues may be referred to in this letter, but the NHIS review may provide more specific requirements.

Several natural resources (i.e. native plants, sites of biodiversity significance, mussels, Topeka shiners, other Species in Greatest Conservation Need) have been identified adjacent to the East Branch of Kanaranzi Creek. Overall, the proposed project crane paths seem to consider this and other resource-rich areas within the project boundary. However, some areas (e.g. crane path between towers 61 and 62 adjacent native plant communities) appear to come excessively close to high value resources despite an adjacent road. We recommend that wherever possible, any resources are avoided by using already established roads or access roads.

The project area is within the Rock River watershed and the East Branch Kanaranzi Creek subwatershed, a designated critical habitat for the federally protected and state special concern species [Topeka Shiner](#). The project should consult with the USFWS. Generally, avoidance practices for this species include those that avoid impacts or degradation of the stream, habitat, or water quality within streams. Specific recommendations are found in the USFWS' [Recommendations for Projects Affecting Waters Inhabited by Topeka Shiners in Minnesota](#).

The State Threatened [Blanding's Turtle](#) has not been specifically identified in this project boundary; however, its habitat often overlaps with Topeka Shiner habitat. This species depends upon both upland and aquatic habitats, moving between them. On-site workers should be provided the Blanding's Turtle ID and Reporting Factsheet (attached) and be vigilant for Blanding's turtles. If a Blanding's turtle is observed within the project area, please document its location and promptly notify the MNDNR Southern Region Nongame Wildlife Specialists who will provide further guidance, as needed. If a Blanding's turtle is in danger of imminent or likely harm, the turtles should be transferred by hand (Blanding's turtles don't bite, hold them by their shells, not by their tails or legs) to a safe, nearby location beyond project activities or other hazards. Turtles which are not in imminent danger should be left undisturbed. Many practices that generally protect stream, wetland, and upland habitat will also help protect Blanding's turtles, although additional measures may be required depending upon site and project specific circumstances. More information and specific recommendations are provided in the [Blanding's Turtle Fact Sheet](#).

We generally recommend wildlife friendly erosion control and invasive species prevention practices (attached) to minimize risks to aquatic and terrestrial habitats.

Bat and Bird Protection

The project proposer will need to prepare an Avian and Bat Protection Plan (ABPP a.k.a. Bird and Bat Conservation Strategy) per [US Fish and Wildlife Service Land-Based Wind Energy Guidelines](#) to identify and document measures to avoid and minimize risks to rare species. After the Tier 1 and Tier 2 Evaluations, we can