

## Shannon Hansen

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**From:** Boettcher, Joanne (DNR) <Joanne.Boettcher@state.mn.us>  
**Sent:** Friday, November 13, 2020 11:30 AM  
**To:** David Weetman  
**Cc:** Warzecha, Cynthia (DNR); Benage, Megan (DNR); Gelvin-Innvaer, Lisa A (DNR); Beste, Brent (DNR); Kresko, Tom (DNR); Doorenbos, Ryan D (DNR); Schuna, Bill (DNR); Kolander, Todd D (DNR); Gieseke, Tim (DNR); Collett, Robert G (DNR); Nick\_Utrup@fws.gov; Dawn Marsh (dawn\_marsh@fws.gov)  
**Subject:** DNR comments on Community Wind South Repower  
**Attachments:** CommunityWindSouthRepower\_DNRCommentLetter\_20201113.pdf

Hi David,

Please find the DNR's comment letter attached.

Thanks,

Joanne Boettcher  
Regional Environmental Assessment Ecologist  
MNDNR – Mankato  
(507) 389-8813





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

November 13, 2020

David Weetman  
Westwood Professional Services, Minnetonka MN  
david.weetman@westwoodps.com

Subject: DNR Early Coordination Comments for Community Wind South Repower

Dear David,

This letter includes DNR's early coordination review comments of the proposed Community Wind South Repower project in response to a review request received on 10/12/20 with shapefile project information received 10/20/20. The proposed project, located in central Nobles County, is to retrofit all 15 turbines with larger rotors and different nacelles to increase energy yield and extend the life of the project. The review request letter describes much of the infrastructure remaining the same, but several temporary impacts as well as road/intersection upgrades will also be necessary. 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 thoroughly review and integrate the [MNDNR Guidance for Commercial Wind Energy Projects](#) throughout project development. Several natural resource GIS data layers are available on the [Minnesota Geospatial Commons](#) including Native Plant Communities, Calcareous Fens, 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](#).

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). I am not currently identifying any issues with this setback and your current tower location in regards to State owned lands, but ensure this requirement is met for private lands as well.

### **Rare Species (NHIS Review) and Habitat Protection**

The MNDNR recommends or requires (depending on the specific type of species/community impact) avoidance of rare species/communities. A Natural Heritage Information System (NHIS) review provides direction on rare species/communities. The NHIS review must be completed, and plans to avoid impacts should be in place, prior

to submitting the PUC application. Your NHIS review was completed 6/8/20 and the results are valid for one year.

The project area is within the Rock River watershed, 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](#).

While none have been reported in the vicinity of this project, recent studies have indicated that the State threatened [Blanding's Turtles](#) have begun moving into this portion of the state, often overlapping with Topeka Shiner habitat. Most practices that will generally protect stream and upland habitat will also help protect Blanding's turtles – more information and specific recommendations are provided in the [Blanding's Turtle Fact Sheet](#). We also encourage on-site worker to keep an eye out for Blanding's turtles and report any sightings to our non-game staff. The Blanding's Turtle ID and Reporting Factsheet (attached) can be provided to staff to help facilitate this.

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 discuss if any additional surveys are recommended. The ABPP should include, as an Appendix, a post-construction fatality monitoring plan to assess project impacts using the [Minnesota Avian and Bat Survey Protocols for Wind Energy Projects](#).

Recent Minnesota Public Utilities Commission site permits have required that all turbines are locked or feathered 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. Site permits also state that operating turbines must be equipped with operational software capable of adjusting turbine cut-in speeds. The MNDNR supports this site permit requirement.

### **Waterbodies**

Three public water streams, their floodplains, and several other smaller flow paths are within the project boundary. Some National Wetland Inventory wetlands and sensitive groundwater areas are also located within the project boundary. Any crossings of public waters will require a [DNR Utility Crossing License](#). If any dewatering or water appropriations are necessary, we encourage early coordination with DNR Hydrologists when applying for water appropriations permits due to sensitive groundwater and surface water features found in and near the project area. The project should work with the appropriate authority (typically the county) to ensure any Wetland Conservation Act, flood plain, or other local environmental requirements are fulfilled.

We look forward to working with you on this in a positive and collaborative manner to ensure that sustainable energy sources are developed while protecting Minnesota's natural resources. Please contact me if you have any questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Joanne Boettcher".

Joanne Boettcher, Regional Environmental Assessment Ecologist

cc:

Cynthia Warzecha, Energy Project Planner  
Megan Benage, Regional Ecologist  
Lisa Gelvin-Innvaer, South District Nongame Wildlife Specialist  
Brent Beste, Groundwater Protection Hydrologist  
Tom Kresko, Area Hydrologist  
Ryan Doorenbos, Area Fisheries Supervisor  
Bill Schuna, Area Wildlife Supervisor  
Todd Kolander, EWR South District Supervisor  
Tim Gieseke, EWR Assistant Regional Manager  
Robb Collett, EWR Regional Manager  
Nick Utrup, USFWS  
Dawn Marsh, USFWS



# HAVE YOU SEEN A BLANDING'S TURTLE ?

State-listed Threatened Species



**Carapace**



**Male=concave Plastron Female=flat**

**Carapace** (upper shell): Round, dome-shaped, very smooth, dull black with specks and streaks of yellow throughout.

**Plastron** (lower shell): Yellow with dark splotches on each scute (section); hinged between 3<sup>rd</sup> and 4<sup>th</sup> pair of scutes (front closes like a drawbridge) So the Blanding's turtle is sometimes called a "semi-Box Turtle"

The **bright yellow chin and underside of the long neck** is one of the most conspicuous features of this turtle. Marshes, ponds, rivers & streams, adjacent uplands; Also travel overland & cross roads. May bask on logs, shore



**Yellow neck/chin; no stripes**



**Domed Carapace**

The MNDNR Nongame Wildlife Program (NWP) is seeking reports of **Blanding's turtles** in the counties of southern Minnesota\*.

If possible, sightings should be verified promptly by either:

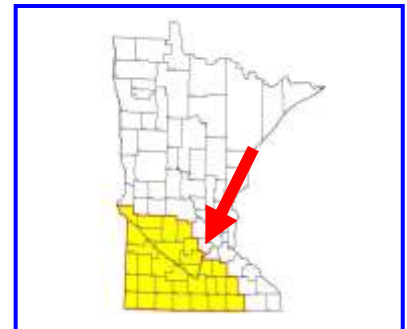
1. photographs showing identifying characteristics (top & bottom of shell, jaw) AND/OR
2. a detailed written description specifying identifying characteristics and circumstances of the sighting. (incl. if turtle shell is marked in any way)

Please include:

- Name phone number &/or email address of person reporting sighting
- Date of Sighting
- Number of Blanding's turtles observed
- Specific Location of Sighting  
e.g. GPS coordinates OR Township, Range Section to the nearest 1/4 1/4 section &/OR
- Specific directions (e.g. roads with distance and direction from nearest town or other conspicuous landmark with any other information that may be helpful for locating the site. Details about the habitat & landowner contacts also really help. **Many Thanks !**

Please Report Sightings as soon as possible to:

MNDNR Nongame Wildlife Program- Southern Region  
Lisa Gelvin-Innvaer, Phone: 507-233-1254 Email: [lisa.gelvin-innvaer@state.mn.us](mailto:lisa.gelvin-innvaer@state.mn.us)  
Mike Worland Phone: 507-362-8786 Email: [michael.worland@state.mn.us](mailto:michael.worland@state.mn.us)



## Standard Erosion Control and Invasive Species Prevention Best Practices

Take precautions when working near waterbodies to prevent sedimentation and erosion:

- Erodible surfaces should not be left exposed for greater than one day. For example, work should not commence late in the week if it will be left unfinished over a weekend.
- Work should not commence if rain is predicted.
- All wheeled or tracked construction equipment should be restricted to work areas above the stream bank.
- Fill material should not be stockpiled in the floodplain.
- Backfill placed below Ordinary High Water (OHW) should consist of clean granular material free of fines, silts, soils, and mud.
- Use [Best Practices for DNR General Public Waters Work Permit GP 2004-0001: Species Protection](#). Refer to pages: 3, 11, 14, 16, 25, 33, and 34 as relevant to a particular project.
- Vegetative “grout” should be incorporated with any installed rip rap (see page 33 of above link).
- [Native species planting/seeding](#) should be used.
- DNR Public Waters Work Permit may be required. Permit requirements must be followed.

Use wildlife friendly erosion control:

- Biodegradable netting should be used, preferably natural materials with short degradation periods.
- Erosion control blankets should be limited to bio-netting or natural netting types due to the risk of entanglement and death of small animals. [2018 MnDOT Standards Specifications for Construction](#) identify acceptable materials in Category 3N or 4N mulches.
- Do not use products that require UV-light to degrade (also called “photodegradable”), as they do not degrade properly when covered/shaded.
- Do not use products containing plastic mesh netting or other plastic components.
- Do not use mulch products that contain synthetic (plastic) fiber additives near waterbodies.
- See [Wildlife Friendly Erosion Control](#) for more information.

Take active steps to prevent invasive species introduction and spread:

- Clean all equipment (including but not limited to: vehicles, clothing, and gear) at a site prior to moving to another site. All soil, aggregate material, mulch, vegetation, seeds, animals, etc. need to be removed using a hand tool, brush, compressed air, pressure washer, or otherwise.
- If equipment is not cleaned before arriving to a work site, then clean the equipment in the parking or staging area, ensuring no material is deposited at the new site. Material cleaned from equipment should be disposed of legally.
- All equipment (including but not limited to: waders, tracked vehicles, barges, boats, turbidity curtain, sheet pile, and pumps) used for work in an “infested water” must be adequately decontaminated. See [Watercraft Decontamination Manual](#) for more information.
- See [Come Clean, Leave Clean](#) for more detailed guidance. This guidance is required for those working on DNR lands as part of grant or contract or are working under a permit, your grant, contract, or permit.

### Referenced Links

[https://files.dnr.state.mn.us/waters/watermgmt\\_section/pwpermits/gp\\_2004\\_0001\\_chapter1.pdf](https://files.dnr.state.mn.us/waters/watermgmt_section/pwpermits/gp_2004_0001_chapter1.pdf)

<https://bwsr.state.mn.us/seed-mixes>

<https://files.dnr.state.mn.us/eco/nongame/wildlife-friendly-erosion-control.pdf>

<http://www.dot.state.mn.us/pre-letting/spec/2018/2018-spec-book-final.pdf>

<https://www.dnr.state.mn.us/invasives/dnrlands.html>

<https://www.dnr.state.mn.us/invasives/dnrlands.html>

[https://files.dnr.state.mn.us/natural\\_resources/invasives/mndnr\\_ais\\_decontamination\\_handbook.pdf](https://files.dnr.state.mn.us/natural_resources/invasives/mndnr_ais_decontamination_handbook.pdf)

October 6, 2020

Greg Ous (District 7 Engineer)  
Minnesota Department of Transportation  
2151 Bassett Drive  
Mankato, MN 56001-6888

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Greg:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

Zephyr plans to retrofit all 15 REpower MM92, 2.05 MW turbines by installing larger rotors and different nacelles. The purpose of the retrofitting project is to improve turbine technology, increase energy yield and extend the useful life of the project. Rotor modifications provide an increase in the rotor swept area, which results in a corresponding increase in the nominal production capacity of the Project. Optimizing energy production using the existing permitted wind energy facility will help the State of Minnesota meet its Renewable Portfolio Standard (RPS) with fewer turbines and less disruption to the natural environment.

The previously permitted locations of turbines, access roads, collection lines, and other supporting infrastructure will remain the same. Full-sized and pre-assembly cranes will be used to remove the old rotors and nacelles and install the new components. Some minor upgrading of public roadways and intersections may be required to allow for delivery of the replacement rotors and nacelles to each turbine location. A temporary laydown yard will be constructed within agricultural lands to stage the turbine components prior to installation. A temporary crane path will also be required for installing the new rotors and nacelles, which will be restored to pre-construction conditions following retrofitting. Efforts will be made to use the original crane path corridor to minimize disturbance to new areas.

No aspect of the project is anticipated to trigger Section 106 of the National Historic Preservation Act. In support of the site permit application, archaeological surveys of the new crane walk areas are being planned for this fall. The archaeological survey results can be provided upon request to

the Tribal Historic Preservation Offices (THPOs). Also, if interested, THPOs can coordinate a visit with the archaeological crews during the survey if they wish to review the area.

Zephyr plans to apply for an amended site permit from the MPUC in Q4 2020 to meet planned construction and a Commercial Operation Date (COD) anticipated in 2022. Written comments provided in response to this letter will be incorporated into the MPUC's review process. Please respond as soon as possible, or within 30 days of the date of this letter. If you have questions or require further information regarding the project, I can be reached at (952) 906-7419 or via email [david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com).

Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager



## Shannon Hansen

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**From:** Piltaver, Angela (DOT) <angela.piltaver@state.mn.us>  
**Sent:** Friday, October 9, 2020 1:59 PM  
**To:** David Weetman  
**Subject:** Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 20201006\_MNDOT.PDF

Mr. Weetman,

Good afternoon! MnDOT District 7 District Engineer Greg Ous has received your letter about the proposed Community Wind South Repower project in Nobles County, MN. In order to better evaluate and provide comment, could you please provide a Google Earth kmz file of the project boundary, along with a map of the original/planned crane walk paths? Also, if there are any state highways that need to be “modified” in order to move the equipment to the lay-down yards, please specify which of those that temporary modifications likely would be needed and the type of modification.

Thank you in advance for your time and assistance.

Angela Piltaver, M.A.U.P., AICP, LEED AP  
Senior Planner  
MnDOT District 7  
2151 Bassett Drive  
Mankato, MN 56001-6888  
507-508-3409  
[angela.piltaver@state.mn.us](mailto:angela.piltaver@state.mn.us)

## Shannon Hansen

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**From:** David Weetman  
**Sent:** Friday, October 9, 2020 10:51 AM  
**To:** greg.ous@state.mn.us  
**Subject:** Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 20201006\_MNDOT.PDF

Please see attached letter regarding the Community Wind South Repower Project.

Best Regards,

### David Weetman

**Environmental Permitting Manager**

david.weetman@westwoodps.com

**direct** (952) 906-7419  
**main** (952) 937-5150  
**cell** (612) 849-5320

### Westwood

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**westwoodps.com**

(888) 937-5150

## Shannon Hansen

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**From:** David Weetman  
**Sent:** Friday, October 9, 2020 2:28 PM  
**To:** Piltaver, Angela (DOT)  
**Cc:** Justin Fike  
**Subject:** RE: Community Wind South Repower Project, Nobles County, MN  
**Attachments:** CWS\_ProjectBoundary\_200319.kmz; CWS Crane Paths 2020-07-28.kmz

Good afternoon Angela,

Attached is a kmz of the project boundary and crane walks.

I'm not aware of state highways that will need to be modified at this stage, but we will keep you in the loop as we move forward and know more.

Please let us know if you have further questions,

Best Regards,  
David

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**From:** Piltaver, Angela (DOT) [mailto:angela.piltaver@state.mn.us]  
**Sent:** Friday, October 9, 2020 1:59 PM  
**To:** David Weetman <David.Weetman@westwoodps.com>  
**Subject:** Community Wind South Repower Project, Nobles County, MN

Mr. Weetman,

Good afternoon! MnDOT District 7 District Engineer Greg Ous has received your letter about the proposed Community Wind South Repower project in Nobles County, MN. In order to better evaluate and provide comment, could you please provide a Google Earth kmz file of the project boundary, along with a map of the original/planned crane walk paths? Also, if there are any state highways that need to be "modified" in order to move the equipment to the lay-down yards, please specify which of those that temporary modifications likely would be needed and the type of modification.

Thank you in advance for your time and assistance.

Angela Piltaver, M.A.U.P., AICP, LEED AP  
Senior Planner  
MnDOT District 7  
2151 Bassett Drive  
Mankato, MN 56001-6888  
507-508-3409  
[angela.piltaver@state.mn.us](mailto:angela.piltaver@state.mn.us)

## Shannon Hansen

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**From:** Degenstein, Doris (DOT) <doris.degenstein@state.mn.us> on behalf of Ous, Greg (DOT) <greg.ous@state.mn.us>  
**Sent:** Monday, October 12, 2020 11:45 AM  
**To:** David Weetman  
**Cc:** Ous, Greg (DOT); Allis, Ronda (DOT)  
**Subject:** RE: Community Wind South Repower Project, Nobles County, MN  
**Attachments:** Community Wind South project response\_10-12-2020.pdf

David,  
Thank you for the opportunity to provide early comment on this project.

Please find our response attached.

If you have questions or need additional information please feel free to contact me.

Thank you,

**Greg Ous, P.E.**

District Engineer  
Minnesota Department of Transportation  
2151 Bassett Drive  
Mankato, MN 56001  
507-304-6101  
[greg.ous@state.mn.us](mailto:greg.ous@state.mn.us)



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**From:** David Weetman <David.Weetman@westwoodps.com>  
**Sent:** Friday, October 09, 2020 10:51 AM  
**To:** Ous, Greg (DOT) <greg.ous@state.mn.us>  
**Subject:** Community Wind South Repower Project, Nobles County, MN

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Please see attached letter regarding the Community Wind South Repower Project.

Best Regards,

**David Weetman**

Environmental Permitting Manager  
david.weetman@westwoodps.com

**direct** (952) 906-7419  
**main** (952) 937-5150  
**cell** (612) 849-5320

**Westwood**

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**westwoodps.com**  
**(888) 937-5150**



**District 7 - Mankato**  
**2151 Bassett Drive**  
**Mankato, MN 56001**

October 12, 2020

Mr. David Weetman  
Environmental Permitting Manager  
Westwood Professional Services  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

Dear David,

We received your letter dated October 6, 2020, notifying MnDOT District 7 of the proposed amendment to the site permit for the Community Wind South project located in Nobles County. Thank you for the opportunity to provide early comment on this project.

We understand that the project includes retrofitting 15 existing turbines with larger rotors and different nacelles to optimize energy production, and that all infrastructure and turbine locations will remain the same. We also understand that full-sized and pre-assembly cranes will be used to remove the old rotors and nacelles and install new components using the original crane path corridor. Further, your letter indicates that some minor upgrading of public roads and intersections may be necessary to deliver the new components for installation.

Based on your correspondence, it appears that the project is not adjacent to state highways, and is unlikely to create direct impacts to the state trunk highway system. Although it is my understanding that at this time you are not aware of any state highways or state highway intersections that will need minor upgrading or modifications to deliver the new equipment, we will appreciate being kept informed if this changes. We look forward to review of the formal application once submitted to the Minnesota Public Utilities Commission, and again, thank you for your early coordination on this project.

Sincerely,

Greg Ous, P.E.  
District Engineer

CC: Ronda Allis, Planning Director

*Equal Opportunity Employer*

## Shannon Hansen

---

**From:** David Weetman  
**Sent:** Friday, October 9, 2020 10:46 AM  
**To:** sarah.beimers@state.mn.us  
**Subject:** Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 20201006\_Minnesota SHPO.PDF

Please see attached letter regarding the Community Wind South Repower Project.

Note: A paper copy has been mailed as well.

Best Regards,

### David Weetman

**Environmental Permitting Manager**  
david.weetman@westwoodps.com

**direct** (952) 906-7419  
**main** (952) 937-5150  
**cell** (612) 849-5320

**Westwood**  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

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(888) 937-5150

October 6, 2020

Sarah Beimers (Environmental Review Program Manager)  
State Historic Preservation Office  
Administration Building #203  
50 Sherburne Ave.  
St. Paul, Minnesota 55155

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Sarah:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

Zephyr plans to retrofit all 15 REpower MM92, 2.05 MW turbines by installing larger rotors and different nacelles. The purpose of the retrofitting project is to improve turbine technology, increase energy yield and extend the useful life of the project. Rotor modifications provide an increase in the rotor swept area, which results in a corresponding increase in the nominal production capacity of the Project. Optimizing energy production using the existing permitted wind energy facility will help the State of Minnesota meet its Renewable Portfolio Standard (RPS) with fewer turbines and less disruption to the natural environment.

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No aspect of the project is anticipated to trigger Section 106 of the National Historic Preservation Act. In support of the site permit application, archaeological surveys of the new crane walk areas



are being planned for this fall. The archaeological survey results can be provided upon request to the Tribal Historic Preservation Offices (THPOs). Also, if interested, THPOs can coordinate a visit with the archaeological crews during the survey if they wish to review the area.

Zephyr plans to apply for an amended site permit from the MPUC in Q4 2020 to meet planned construction and a Commercial Operation Date (COD) anticipated in 2022. Written comments provided in response to this letter will be incorporated into the MPUC's review process. Please respond as soon as possible, or within 30 days of the date of this letter. If you have questions or require further information regarding the project, I can be reached at (952) 906-7419 or via email [david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com).

Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

## Shannon Hansen

---

**From:** GraggJohnson, Kelly (ADM) <kelly.graggjohnson@state.mn.us>  
**Sent:** Monday, November 9, 2020 4:51 PM  
**To:** David Weetman  
**Subject:** SHPO No. 2021-0181; Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 2021-0181.pdf

Good Afternoon,

Here is the SHPO comment letter for this project. Please let me know if you have any questions.

Best,

Kelly



**Kelly Gragg-Johnson | Environmental Review Specialist**  
**50 Sherburne Avenue, Suite 203**  
**Saint Paul, MN 55155**  
**(651) 201-3285**  
[kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us)

Given the Governor's implementation of [Stay Safe MN](#), SHPO staff will continue to work remotely and be available via [phone and email](#), and the SHPO office will be closed to visitors and unable to accommodate in-person research and deliveries. Mail is being delivered to the office via USPS, FedEx and UPS, however, staff have limited weekly access to sort and process mail. Our office will continue to take file search requests via [DataRequestSHPO@state.mn.us](mailto:DataRequestSHPO@state.mn.us). Check [SHPO's webpage](#) for the latest updates and we thank you for your continued patience.



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**From:** Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>  
**Sent:** Monday, October 19, 2020 5:38 PM  
**To:** MN\_ADM\_ENV Review SHPO <ENReviewSHPO@state.mn.us>  
**Subject:** FW: Community Wind South Repower Project, Nobles County, MN

For Kelly.

**Sarah Beimers | Environmental Review Program Manager**  
**Minnesota State Historic Preservation Office**  
50 Sherburne Avenue, Suite 203  
Saint Paul, MN 55155  
(651) 201-3290  
[sarah.beimers@state.mn.us](mailto:sarah.beimers@state.mn.us)

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[Facebook](#) | [Instagram](#) | [Twitter](#)

---

**From:** David Weetman <[David.Weetman@westwoodps.com](mailto:David.Weetman@westwoodps.com)>  
**Sent:** Friday, October 9, 2020 10:46 AM  
**To:** Beimers, Sarah (ADM) <[sarah.beimers@state.mn.us](mailto:sarah.beimers@state.mn.us)>  
**Subject:** Community Wind South Repower Project, Nobles County, MN

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Please see attached letter regarding the Community Wind South Repower Project.

Note: A paper copy has been mailed as well.

Best Regards,

**David Weetman**  
**Environmental Permitting Manager**  
[david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com)

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**Westwood**  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**[westwoodps.com](http://westwoodps.com)**  
**(888) 937-5150**

November 9, 2020

David Weetman  
Westwood Professional Services  
12701 Whitewater Driver, Suite 300  
Minnetonka, MN 55343

RE: File: 0026682.00  
Community Wind South Repower Project  
Nobles County  
SHPO Number: 2021-0181

Dear Mr. Weetman:

Thank you for the opportunity to comment on the above project. Information received on October 9, 2020 has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and the Minnesota Field Archaeology Act (Minn. Stat. 138.40).

According to your October 6, 2020 cover letter, Zephyr Wind is planning to retrofit fifteen (15) existing wind turbines by installing larger rotors and different nacelles. This will improve turbine technology, increase energy yield, and extend the useful life of the project. The previously permitted locations of turbines, access roads, collection lines, and other supporting infrastructure will stay the same, however, large cranes will be used to remove the old rotors and nacelles and install the new components. Some minor upgrades to existing public roadways and intersections may be required to allow for delivery of these large components and a temporary equipment laydown yard and crane path will be constructed in order to install the new equipment.

Due to the nature and location of the proposed project, we recommend that a Phase IA literature review be conducted to assess the potential for architectural and archaeological resources being located within the proposed project area. If, as a result of this assessment, a Phase I archaeological survey is recommended, this survey should be completed. The Phase I survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking this type of research and archaeological surveys, please visit the website

**<http://www.mnhs.org/shpo/preservation-directory>**, and select "Archaeologists, Contract" in the "Specialties" box.

The Phase Ia literature review and assessment should take into account not only direct impacts, but potential indirect impacts as well. This would include the introduction of visual, atmospheric, or audible elements that may have an effect on any historic structures that are listed in the National or State Register of Historic Places, as well as any changes to a historic property's use.

The resulting cultural resources report should include a map with clearly marked project areas including the new laydown yard, crane paths, and larger above-ground equipment structures in relation to any identified cultural resources (architectural properties and archaeological sites). The report should discuss ways in which the project will avoid impacting, both directly and indirectly, any cultural resources that are identified.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact me at [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,

*Kelly Gragg-Johnson*

Kelly Gragg-Johnson  
Environmental Review Specialist

## Shannon Hansen

---

**From:** David Weetman  
**Sent:** Friday, October 9, 2020 10:58 AM  
**To:** [execdir@swrdc.org](mailto:execdir@swrdc.org)  
**Subject:** Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 20201006\_Southwest Regional Dev Commis.pdf

Please see attached letter regarding the Community Wind South Repower Project.

Best Regards,

### David Weetman

**Environmental Permitting Manager**

[david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com)

**direct** (952) 906-7419  
**main** (952) 937-5150  
**cell** (612) 849-5320

### Westwood

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**[westwoodps.com](http://westwoodps.com)**

**(888) 937-5150**

October 6, 2020

Jayne I. Trusty  
South West Regional Development Commission  
2401 Broadway Avenue, Suite 1  
Slayton, MN 56172

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Jayme:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

Zephyr plans to retrofit all 15 REpower MM92, 2.05 MW turbines by installing larger rotors and different nacelles. The purpose of the retrofitting project is to improve turbine technology, increase energy yield and extend the useful life of the project. Rotor modifications provide an increase in the rotor swept area, which results in a corresponding increase in the nominal production capacity of the Project. Optimizing energy production using the existing permitted wind energy facility will help the State of Minnesota meet its Renewable Portfolio Standard (RPS) with fewer turbines and less disruption to the natural environment.

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the Tribal Historic Preservation Offices (THPOs). Also, if interested, THPOs can coordinate a visit with the archaeological crews during the survey if they wish to review the area.

Zephyr plans to apply for an amended site permit from the MPUC in Q4 2020 to meet planned construction and a Commercial Operation Date (COD) anticipated in 2022. Written comments provided in response to this letter will be incorporated into the MPUC's review process. Please respond as soon as possible, or within 30 days of the date of this letter. If you have questions or require further information regarding the project, I can be reached at (952) 906-7419 or via email [david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com).

Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager



## Shannon Hansen

---

**From:** David Weetman  
**Sent:** Friday, October 9, 2020 10:53 AM  
**To:** john.shea@noblesswcd.org  
**Subject:** Community Wind South Repower Project, Nobles County, MN  
**Attachments:** 20201006\_Nobles Soil & Water Cons Dist.pdf

Please see attached letter regarding the Community Wind South Repower Project.

Best Regards,

### David Weetman

**Environmental Permitting Manager**

david.weetman@westwoodps.com

**direct** (952) 906-7419  
**main** (952) 937-5150  
**cell** (612) 849-5320

### Westwood

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**westwoodps.com**

(888) 937-5150

October 6, 2020

John Shea (District Manager)  
Nobles County SWCD  
1567 McMillan Street, Suite 3  
Worthington, MN 56187

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear John:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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The previously permitted locations of turbines, access roads, collection lines, and other supporting infrastructure will remain the same. Full-sized and pre-assembly cranes will be used to remove the old rotors and nacelles and install the new components. Some minor upgrading of public roadways and intersections may be required to allow for delivery of the replacement rotors and nacelles to each turbine location. A temporary laydown yard will be constructed within agricultural lands to stage the turbine components prior to installation. A temporary crane path will also be required for installing the new rotors and nacelles, which will be restored to pre-construction conditions following retrofitting. Efforts will be made to use the original crane path corridor to minimize disturbance to new areas.

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Zephyr plans to apply for an amended site permit from the MPUC in Q4 2020 to meet planned construction and a Commercial Operation Date (COD) anticipated in 2022. Written comments provided in response to this letter will be incorporated into the MPUC's review process. Please respond as soon as possible, or within 30 days of the date of this letter. If you have questions or require further information regarding the project, I can be reached at (952) 906-7419 or via email [david.weetman@westwoodps.com](mailto:david.weetman@westwoodps.com).

Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Bill Latady  
Bois Forte Tribal Historic Preservation Office  
5344 Lake Shore Drive/PO Box 16  
Nett Lake, MN 55772

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Bill:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Jill Hoppe  
Fond du Lac Tribal Historic Preservation Office  
1720 Big Lake Road  
Cloquet, MN 55720

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Jill:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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No aspect of the project is anticipated to trigger Section 106 of the National Historic Preservation Act. In support of the site permit application, archaeological surveys of the new crane walk areas are being planned for this fall. The archaeological survey results can be provided upon request to

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Mary Ann Gagnon  
Grand Portage Tribal Historic Preservation Office  
PO Box 428  
Grand Portage, MN 55605

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Mary Ann:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Melissa Cerda  
Cultural Resources Specialist  
Minnesota Indian Affairs Council  
161 St. Anthony Ave, Suite 919  
St. Paul, Minnesota 55103

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Melissa:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Amy Burnette  
Leech Lake Tribal Historic Preservation Office  
115 6th Street NW, Suite E  
Cass Lake, MN 56633

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Amy:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Cheyenne St. John  
Tribal Historic Preservation Office Lower Sioux Indian Community  
39527 Highway 1  
Morton, Minnesota 56270

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Cheyenne:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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Sincerely,

WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager

October 6, 2020

Natalie Weyaus  
Mille Lacs Tribal Historic Preservation Office  
43408 Oodena Drive  
Onamia, MN 56349

**Re: Community Wind South Repower Project, Nobles County, Minnesota**  
File: 0026682.00

Dear Natalie:

On behalf of Zephyr Wind, LLC (Zephyr), Westwood Professional Services is writing to request comments regarding the Applicant's plans to obtain an amended site permit from the Minnesota Public Utilities Commission (MPUC) for the Community Wind South Project located in Nobles County, Minnesota (Exhibit 1). The original Site Permit for the 30.75 megawatt large wind energy conversion system (LWECS) was issued by the MPUC on May 1, 2012.

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WESTWOOD PROFESSIONAL SERVICES



David M. Weetman  
Environmental Permitting Manager