

**Office of Land Management**

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Mailstop 678

March 20, 2018

David Birkholz, Environmental Review Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198

RE: In the Matter of the Applications of Nobles 2 Power Partners, LLC for a Certificate of Need and Site Permit Application for the Nobles 2 Wind Project in Nobles County  
PUC Docket Number: IP6964/CN-16-289 (Certificate of Need)  
IP6964/WS-17-597 (Site Permit)

Dear Mr. Birkholz,

On February 12<sup>th</sup>, 2018, the Minnesota Public Utilities Commission (PUC) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information which includes a public comment period regarding the scope of the draft site permit that is under consideration with respect to the Nobles 2 Wind Project, a 260 MW Large Wind Energy Conversion System in Nobles County. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

MnDOT appreciates the opportunity to comment on the draft site permit. MnDOT notes that there are several provisions that may have impacts on the state transportation system.

The draft site permit should include language specifying that the Permittee shall obtain all relevant permits or authorizations from road authorities relating to any electric cables and/or feeder lines that may be proposed to be placed in a public road right of way. MnDOT has adopted a formal policy and procedures for accommodation of utilities on the highway rights of way ("Utility Accommodation Policy"). A copy of MnDOT's policy can be found at <http://www.dot.state.mn.us/policy/operations/op002.html>. MnDOT's policy seeks to permit utilities to occupy portions of the trunk highway rights of way where such occupation does not put the safety of the traveling public or highway workers at risk or unduly impair the public's investment in the transportation system. Compliance with MnDOT's Utility Accommodation Policy, and similar policies of other road authorities, should be included as a condition of the site permit.

Based on the information provided in the Site Permit Application, it appears that the project area involves trunk highways (TH) 91 and 266. As stated in the Application, MnDOT District 7 has communicated with the Applicant that TH 91 would be resurfaced and two box culverts replaced in the fall of 2018 or summer of 2019, potentially impacting delivery of wind turbine components. At

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times, these scheduled projects could change the alignment/width of an existing right of way and therefore could have an impact on placement decision of wind turbines. Future state projects for this area can be found by visiting: <http://www.dot.state.mn.us/d7/projects.html>. Consideration for future projects should be made when placing wind turbines at the PUC minimum 250 foot setback (1 times the total height respectively for Nobles County and Project Design) from any MnDOT trunk highway right of way. Additionally, there may be highway-related considerations related to oversize/overweight hauling of wind turbines and equipment. Large loads of freight are often transported along nearby interregional corridors such as I-90 (High priority) and US 59 (Regional). 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. If the Nobles 2 Wind Project or its associated facilities should happen to intersect with the trunk highway system, the Applicant will need to apply for and obtain permits for those locations.

Mention could not be located in the Application or Appendix E (Telecommunication Studies) regarding ARMER microwave paths in the immediate or surrounding project area. Wind turbine placement could affect MnDOT's ARMER microwave paths. The Applicant should consult with MnDOT's Office of Statewide Radio Communications to confirm the impact status of this project.

Any wind farm construction work, including delivery or storage of structures, materials or equipment that may affect MnDOT right of way is of concern such that MnDOT should be involved in planning and coordinating such activities. The site permit should include language specifying that the Permittee shall obtain all relevant permits from road authorities relating to the transport of oversize materials and equipment related to the project over public roads, as well as installation of facilities that may be proposed to occupy portions of public road rights of way. If work is required within MnDOT right of way for temporary or permanent access, such work should be coordinated with Marc Fischer, Engineering Specialist in the District 7B Permits Office at 507-831-8012 or [Marc.Fischer@state.mn.us](mailto:Marc.Fischer@state.mn.us).

Sincerely,



Stacy Kotch Egstad

Utility Transmission Route Coordinator

Minnesota Department of Transportation

cc: Marc Fischer – MnDOT District 7B Permits

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