

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

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April 12, 2018

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Palmer's Creek Wind Farm, LLC for a Large Wind Energy Conversion System Site Permit for the 44.6 MW Palmer's Creek Wind Project in Chippewa County
PUC Docket Number: IP-6979/WS-17-265

Dear Mr. Wolf,

The Minnesota Department of Natural Resources (DNR) has reviewed the Native Prairie Protection Plan (filed April 5, 2018) and the Wildlife Monitoring Report (filed March 28, 2018) for Palmer's Creek Wind Farm. The DNR appreciated the opportunity to review draft versions of both documents before they were filed. The modifications we requested were adequately addressed in the final documents.

The Draft Site Permit has a condition specific to the Avian Bat Protection Plan (ABPP) that references coordination with the DNR. In accordance with that condition, DNR staff reviewed the ABPP prior to its filing on April 5, 2018. Based on that review, our agency requested several revisions. Although some of the changes were made, our agency still has two primary concerns with the ABPP.

From the DNR's perspective, Fagen Engineering has been too closely involved in the development of the Palmer's Creek Wind Farm to serve as an objective and unbiased independent third party. Therefore, we reiterate our recommendation that an independent party conduct the post-construction fatality monitoring.

In addition, the DNR advised that Appendix C of the ABPP clearly state that the 10 plots used for the carcass searches be cleared. Cleared plots increase searcher efficiency and positive identification of the birds and bats being killed. Our agency again recommends that the text in Appendix C specify that the 10 plots be cleared of vegetation. Incorporating these recommendations will improve fatality estimates and add validity to the ABPP.

If you have any questions, please contact me at 651-259-5078.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Warzecha". The signature is written in black ink and has a fluid, connected style.

Cynthia Warzecha

Energy Projects Planner

Environmental Review Unit

CC: Cezar Panait, Minnesota Public Utilities Commission
Richard Davis, Minnesota Department of Commerce
Mike Rutledge, Fagen Engineering
ERDB 20160322