



August 6, 2015

Tricia DeBleeckere
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101-2147

Re: In the Matter of Flat Hill Windpark I, LLC's Certificate of Need for a 201 Megawatt Large Energy Conversion System and Associated Facilities in Clay County
PUC Docket Number/s: IP-6687/CN-08-951, WS-08-1134

Dear Ms. DeBleeckere:

The Minnesota Department of Natural Resources (DNR) has reviewed the Noble Flat Hill Wind Farm I record and has the following comments regarding the amendment to the site permit.


If the Public Utilities Commission determines that it is appropriate to amend the Site Permit to extend the time for commencing construction, then the DNR recommends also amending the site permit to reflect more recent updates in environmental permit conditions.

DNR records show that the last Natural Heritage Information System (NHIS) review of this project was dated January 9, 2007. The project developer should request an updated review of the current project boundary. Updated information should be used to inform an Avian and Bat Protection Plan (ABPP).

Previously, the DNR assessed the project area and estimated the risk of bird and bat fatality to be low due to avoidance of the nearby beach ridge habitat. It is possible that this assessment could be updated based on changes in the Natural Heritage Information System data or results of pre-construction surveys. If the risk remains low, it would be appropriate for the Site Permit to be amended to include a condition requiring post-construction fatality monitoring for one year. The DNR recommends that the company review the Avian and Bat Survey Protocols for Wind Energy Projects at: http://www.dnr.state.mn.us/eco/pubs_landuse.html. The permittee should develop monitoring protocol in coordination with the Department of Commerce Energy Environmental Review and Analysis and the DNR.

Thank you for the opportunity to provide comments regarding the Noble Flat Hill Wind Farm I Site Permit Amendment. Please contact me with any questions.

Sincerely,


Caroline Magnuson, Planner
Environmental Review Unit
(651) 259-5130

cc: David Birkholz, Minnesota Department of Commerce
Brian Meloy, Stinson Leonard Street, LLP

