

Figure 3.5: General Land Office Map
 Xcel Energy
 Nobles Wind Farm Repower Project
 Nobles County, Minnesota

Project Area	Turbine Location
Literature Search Study Area	Previous Survey
	Township Boundary



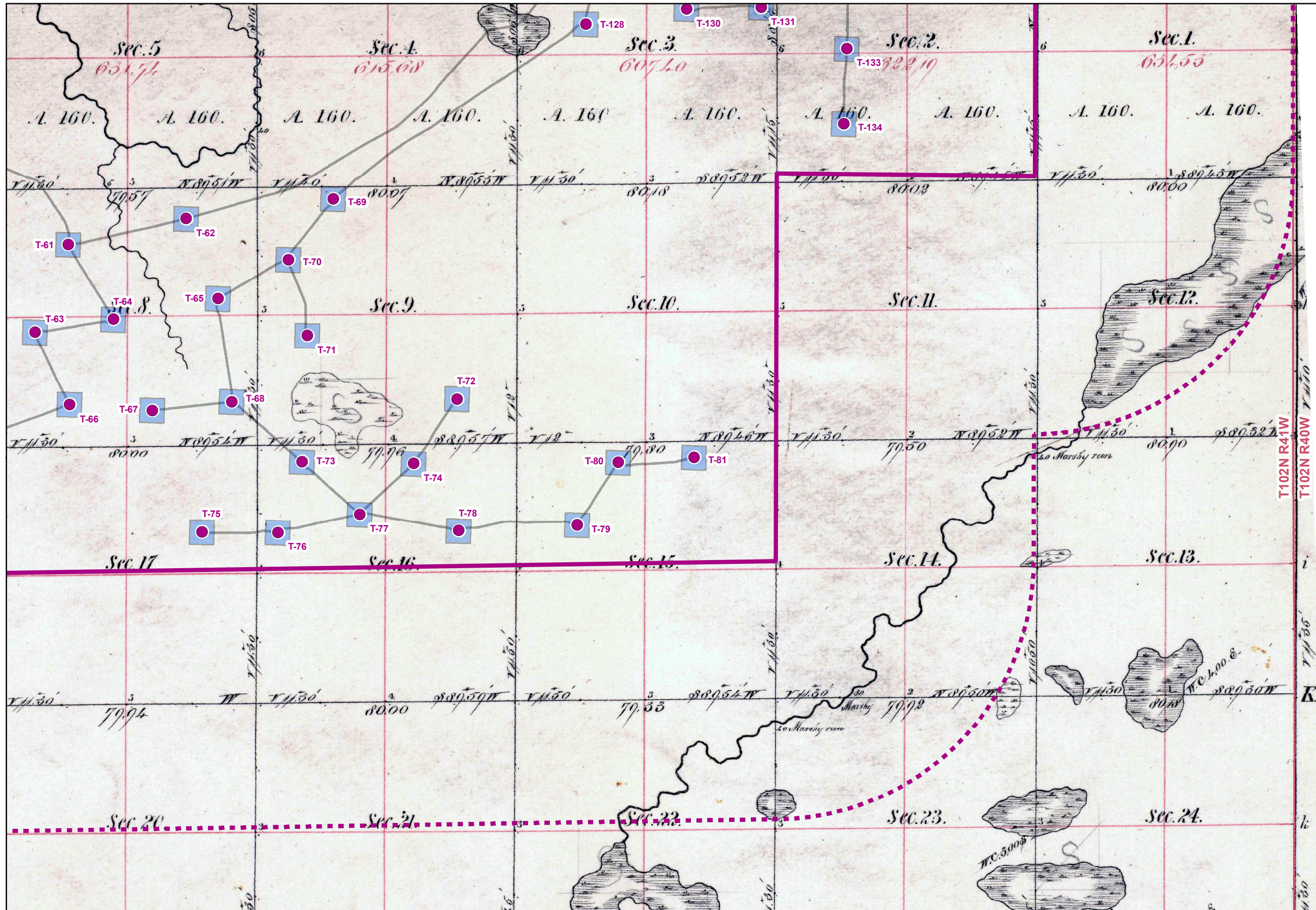


Figure 3.6: General Land Office Map
Xcel Energy
Nobles Wind Farm Repower Project
Nobles County, Minnesota

-  Project Area
-  Literature Search Study Area
-  Turbine Location
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p 612.746.3660 ■ f 612.746.3679 ■ www.merjent.com

1 Main Street SE ■ Suite 300 ■ Minneapolis, Minnesota ■ 55414

Via Email

February 22, 2021

Ms. Lisa Joyal
Endangered Species Review Coordinator
NHIS Data Distribution Coordinator
Division of Ecological and Water Resources
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155

Email: lisa.joyal@state.mn.us

**Re: Natural Heritage Data Review of the Proposed Nobles Repower Project
Nobles County, Minnesota**

Dear Ms. Joyal:

On behalf of Northern States Power Company (NSP), a Minnesota corporation, doing business as Xcel Energy, Merjent, Inc. (Merjent) queried the Minnesota Natural Heritage Information System (NHIS) to conduct a natural heritage data review for the proposed Nobles Wind Farm Repower Project (Project).

Merjent holds a license agreement with the Minnesota Department of Natural Resources (MnDNR) to access electronic NHIS data. On April 22, 2020, Merjent requested from the MnDNR its annual NHIS data update per its license agreement which was provided on May 8, 2020. This updated MnDNR data was used for this Natural Heritage Data Review by a trained and experienced Merjent biologist. The following provides a brief background of the Project, results of the NHIS query, additional information, and an assessment of potential impacts to rare natural features and state-listed species. Based upon this information and review, Merjent respectfully requests that the MnDNR review and concur with this Natural Heritage Data Review for the Project.

Background

On December 11, 2009, the Commission issued an order approving a site permit to enXco Development corporation to construct the Nobles Wind Farm (the 2009 Site Permit). The Commission order also approved the transfer of the Site Permit from enXco to NSP, effective upon notification to the Commission. On August 9, 2010, NSP and enXco notified the Commission of the transfer of the 2009 Site Permit to NSP pursuant to the December 11, 2009 Order. On August 25, 2010, the Commission issued an order transferring and reissuing the site permit to NSP (the 2009 Site Permit, as amended).

Xcel Energy is seeking an amendment of the Site Permit to allow Xcel Energy to repower all 134 turbines (Repower), which will increase energy production from the facility, improve overall reliability, and extend the service life of the turbines. The current turbines are otherwise operating as planned. In 2010 when the GE 1.5 sle turbines were installed, the rotor size was 77 meters (252.6 feet) in diameter; Xcel Energy proposes to repower 111 turbines with 97-meter rotors and 22 turbines with 91-meter rotors and replace one GE 1.5 sle with a Vestas V136 turbine within approximately 100 feet of the existing turbine’s location.

The purpose of the repowering project is to improve turbine technology, maximize energy yield, and extend service life of the turbines. New blades provide an increase in the rotor swept area, which, when coupled with the upgraded generators, results in a corresponding increase in the nominal production capacity of the Project from 201 MW to roughly 217 MW, a 7.7 percent increase.

Project Description

The Repower Project infrastructure is physically located on approximately 23,910 acres of privately owned and mostly leased land in Nobles County (Table 1), generally north of Interstate 90 and west of Highway 25 (Figure 1 – Project Location). All of these acres are located within the previously evaluated, and permitted, project boundary. Approximately 1,615 acres of the 2009 permitted boundary contains a portion of the Community Wind South Wind Farm and its infrastructure, not Nobles Wind Farm infrastructure, and has therefore been eliminated from the Repower Project Area for permit amendment purposes (Figure 2 – Project Boundary Modification). Typical landscapes within the reduced Wind Farm area consist largely of agricultural fields and wind energy infrastructure.

Xcel Energy is also negotiating with additional landowners for wind rights-only leases to accommodate the 3RD x 5RD Wind Access Buffer setback for the longer blades. Figure 3 (Wind Access Buffer Setbacks) shows the existing wind easements and the parcels Xcel Energy is acquiring wind rights only leases for (i.e., no impacts to listed species or rare natural resources would occur on these wind rights-only lands).

Table 1 Project Location				
County Name	Township Name	Township	Range	Sections
Nobles	Dewald	102N	41W	2-10 and 15-18
	Olney	102N	42W	1-2 and 11-12
	Summit Lake	103N	41W	15-17, 20-23, 25-28, and 31-35
	Larkin	103N	42W	10-15, 22-26, and 34-36

Construction of the Repower Project will require the following temporary workspaces (Figure 4):

- Generally, 400-foot radius around turbines,
- Up to 150-foot-wide access roads,
- Up to 100-foot-wide crane paths, and
- One 23-acre laydown area on Xcel Energy Property.

Additionally, the V136 turbine will require less than 0.1 acre of permanent impact associated with a 25-foot radius turbine pad and 16-foot wide access road approximately 36 feet in length.

Natural Heritage Review

In a letter dated November 2, 2020, Xcel Energy requested comments on the Project from the MNDNR. The MNDNR responded with early coordination comments on the Project in a letter dated December 2, 2020. Those comments are attached and discussed further below as they pertain to this NHIS Review Request.

Native Prairie

Xcel Energy will generally use a 400-foot radius around each turbine for a temporary construction workspace unless a sensitive area necessitates avoidance. There is MNDNR-mapped native prairie within 400 feet of Turbine 42. As such, Xcel Energy will use an irregular shaped workspace at this turbine to avoid impacts to MNDNR-mapped native prairie; the temporary workspace will be limited to cultivated cropland. Similarly, Xcel Energy has sited all crane paths to avoid MNDNR-mapped native prairie.

Native Plant Communities

Similar to avoidance of MNDNR-mapped native prairie, Xcel Energy will avoid temporary construction impacts to native plant communities (NPCs). Turbine 42 is also within 400 feet of a NPC (similarly mapped MNDNR-native prairie), however, Xcel Energy will use an irregular shaped workspace in cropland to avoid impacts to NPCs.

In preliminary comments on the Project, the MNDNR noted concerns with the distance from the crane path between turbines 61 and 62 and the adjacent NPCs and recommended that these resources are avoided by using already established roads or access roads. Xcel Energy has removed the crane path between Turbines 61 and 62 and has designed the updated crane paths to include a buffer between the crane path and any NPCs. Further, in general, Xcel Energy will utilize a 400-foot-radius construction workspace around each turbine; however, where the turbines are in proximity to NPCs, Xcel Energy will utilize an irregular workspace design to avoid impacts to NPCs.

Sites of Biodiversity Significance

Similar to native prairie and NPCs, Xcel Energy will limit construction workspaces to cultivated cropland where the 400-foot workspace buffer includes SOBS. Irregular workspaces would be utilized at Turbines 3, 11, 42, 50, and 110. Turbine 110 is sited in cultivated cropland and crosses approximately 85 feet of one MBS SOBS (ranked “below”); however, the current land use where the crane path intersects this MBS SOBS is actively cultivated agricultural field. Agricultural production in the immediate Project vicinity may experience minor short-term impacts from the use of crane paths during construction, but these impacts would resolve when construction is complete.

State-listed Species

Merjent reviewed the MndNR NHIS for state-listed threatened and endangered species that are known to occur within 1 mile of the proposed Project. There are no records of species listed as state threatened or endangered within 1 mile of the Project. However, although not identified within 1 mile of the Project Area, the MNDNR noted in its early coordination comments that habitat for the state-threatened Blanding’s turtle often overlaps with that of the federally listed Topeka shiner, which is present in the Project area.

Suitable aquatic habitat used by the Blanding’s turtle will not be directly impacted by the Project; however, indirect impacts could occur as the result of sedimentation from construction activities near waterbodies. In addition, it’s possible that Blanding’s turtles could pass through the Project Area while

traveling between aquatic and nesting habitats in the summer or when the turtles move to and from overwintering sites (spring and fall).

Per the MNDNR's recommendations, Xcel Energy will provide workers with the Blanding's Turtle ID and Reporting Fact Sheet; if a Blanding's turtle is observed within the Project Area, Xcel Energy will document its location and contact the MNDNR for further guidance. Xcel Energy will also adhere to the Recommendations for Avoiding and Minimizing Impacts to Blanding's Turtle, provided in the MNDNR's Blanding's Turtle Fact Sheet, as applicable. In addition, Xcel Energy's commitment to the mitigation measures discussed below for the federally listed Topeka shiner will also be protective of Blanding's turtle aquatic habitat.

- Follow all applicable requirements and BMPs for stormwater and erosion control;
- In non-cropland areas, Xcel Energy will mulch areas of disturbed soils and reseed promptly with native species; and
- Implement appropriate erosion and sediment prevention measures to the maximum extent practicable. Inspect devices frequently to ensure that they are effective and in good repair, especially after precipitation.

Based on implementation of the measures described above, we believe the Project will not impact state-listed species or rare natural resources. On behalf of Xcel Energy, Merjent respectfully requests that the MNDNR review and concur with this Natural Heritage Data Review for the Project within 30 days of receipt of this submittal. Xcel Energy has also reached out to the U.S. Fish and Wildlife Service regarding impacts to federally listed species.

Should you have any questions or comments regarding this matter, please contact me at 612-746-3666, or at angela.durand@merjent.com.

Sincerely,



Angela Durand
Senior Environmental Analyst
Merjent, Inc.

- Enclosure:
- Figure 1 – Project Location Map
 - Figure 2 – Project Boundary Modification
 - Figure 3 – Wind Access Buffer Setbacks
 - Figure 4 – Project Area and Facilities
 - MN DNR Early Coordination Letter (dated December 2, 2020)