

September 10, 2018

David P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of the Applications of Flying Cow Wind, LLC for a Site Permit for the up to 152 MW Bitter Root Wind Project and Associated Facilities in Yellow Medicine County. EERA's exceptions to the Administrative Law Judge's Findings of Fact, Conclusions of Law and Recommendation

OAH No. 60-2500-35035
MPUC No. IP6984/WS-17-749

Dear Mr. Wolf:

EERA has reviewed the Findings of Fact, Conclusions of Law and Recommendation (Report) prepared by Administrative Law Judge James E. LaFave for the above referenced docket.

EERA appreciates Judge LaFave's thorough review of the record; staff edits are attached (applicable pages only) as "tracked changes" to said report. Below EERA provides the Commission with a narrative on the recommended changes.

Finding 194, page 36 of the ALJ's report

EERA staff has the following three concerns regarding Finding 194; First, the finding appears in Section XI *Application of the Statutory Siting Criteria to the Proposed Project*, and as such should be limited to the facts surrounding potential impacts from the Bitter Root Wind Project for each criterion, leaving findings and footnotes regarding public comments (i.e., "Numerous residents of Lake Cochrane have expressed concerns....") to Section IX *Summary of Public and Agency Comments*.

Second, omitting data on the distance of the nearest turbine to Lake Cochrane misrepresents the potential visual impact.

EERA provides the following suggested changes to Finding 194 below:

194. Lake Cochrane is located less than one-half mile from the Minnesota

~~South Dakota Border,³⁴⁷ with the closest turbine (T3) located approximately 1.25 miles east of the lake. Several turbines will be prominently visible and dominate the horizon as viewed from the Lake Cochrane Recreation Area.³⁴⁸ Numerous residents of Lake Cochrane have expressed concerns regarding the visual disruption to this natural resource and vigorously oppose locating any turbines within 3 miles of Lake Cochrane.³⁴⁹~~

Third, footnote 348 of the ALJ's report actually references two documents, the first being Exhibit 214 (submitted into the record on June 22, 2018, prior to the Public Hearing, eDocket No. 20186-144071-01 to 05) which includes visual simulations of the proposed Bitter Root Wind Project prepared by DNV KEMA Renewables, Inc. (DNV GL). The second item (submitted by the Lake Cochrane Improvement Association (LCIA) during the Public Hearing reply comment period on August 6, 2018, eDocket No. 20188-145563-02) is a pictorial representation of the Bitter Root Wind Project prepared by Artistic Engineering (AE) from a photograph provided by the LCIA.

The footnote in the "tracked changes" version attached is edited for clarification.

Importantly, the two simulations vary considerably in their representations. While the DNV GL document provides, along with the photomontages, a report describing the methodology, data and software used to develop the simulations, the LCIA/AE submittal provides minimal information in which to evaluate the accuracy of the work-product.

Finding 224, page 42 of the ALJ's report

As with Finding 194, omitting data on the distance of the nearest turbine to Lake Cochrane misrepresents the potential visual impact.

EERA provides the following suggested changes to Finding 224 below:

224. In addition, the Lake Cochrane Recreation Area is located one-half mile to the west of the Project in Deuel County, South Dakota,⁴¹⁵ with the closest turbine (T3) located approximately 1.25 miles east of the lake. The South Dakota Department of Game Fish and Parks operates the Lake Cochrane recreation area on the north shore of Lake Cochrane.⁴¹⁶ The recreational area offers camping, cabin lodging, picnic facilities, a playground, and a swimming beach.⁴¹⁷ There is also a well-used walking and running path that circles the lake.⁴¹⁸ There is also a public golf course adjacent to the lake.⁴¹⁹

Section Z Permit Conditions, new Finding 312, page 60 of the ALJ's report

In its August 6, 2018, comment letter (Comments and Recommendations, eDocket No. 20188-145537-01) relative to proposed modifications and additions to the Draft Site Permit, EERA also stated that the staff does not support the requested 3-mile setback from Lake Cochrane, implying that the more restrictive set-back requirement, above the standard LWECS conditions and the Yellow Medicine County Land Use and Related Resource Management Ordinance, was not warranted.

EERA provides the following suggested new finding (Finding 312) below:

312. EERA also recommended that the Commission not adopt the three mile set-back from Lake Cochrane as the project has been designed to comply with the Setbacks, and the Requirements and Standards of the Yellow Medicine County Land Use and Related Resource Management Ordinance, which includes management directives related to floodplains, shore-land, rural preservation, and renewable energy.

The Administrative Law Judge' Suggested Changes, page 61 of the ALJ's report

The ALJ's suggested changes to the Site Permit (i.e., the removal of turbine locations A2, T35, T2, and T3 via micro-siting) are based on the opinion that the presence of these turbines would damage Lake Cochrane's recreational resources, lower property values around the lake, negatively impact tourism along with the benefits it provides to the community, and injure Lake Cochrane's status as a unique natural resource.

While EERA does agree that micro-siting is a helpful tool in the mitigation/minimization of those types of impacts, the record in the Bitter Root Wind Project docket does not in fact support the supposition that there are significant impacts to the site permit criteria to warrant the removal of turbine locations A2, T35, T2, and T3.

As such, EERA recommends deleting Finding 313 through Finding 317 in the ALJ's report.

Conclusions of Law, page 62 of the ALJ's report

As in the previous discussion, EERA does not agree with the ALJ that removal of turbine locations A2, T35, T2, and T3, is necessary for the Bitter Root Wind Project to comply with the requirements of Minnesota Statute Section 216B.03, that LWECs must be sited in an orderly manner compatible with environmental preservation, sustainable development, and efficient use of resources.

Therefore, in order to align the "Conclusions of Law" with the supportable facts within the Bitter Root Wind Project docket record, EERA recommends the deleting of Conclusion-Finding 8, and the following changes to Conclusion-Findings 9, 10, and 11.

9. The Project, with the Draft Site Permit conditions revised as set forth in EERA's Comments and Recommendations ~~above and removal of turbines A2, T35, T2, and T3~~, satisfies the site permit criteria for a LWECs contained in Minn. Stat. § 216F.03 and meets all other applicable legal requirements.
10. The Project, with the permit conditions as set forth in EERA's Comments and Recommendations ~~discussed above and removal of turbines A2, T35, T2, and T3~~, is compatible with environmental preservation, sustainable development, and the efficient use of resources.

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11. The Project, with the permit conditions as set forth in EERA's Comments and Recommendations ~~discussed above and removal of turbines A2, T35, T2, and T3~~, does not present a potential for significant adverse environmental effects pursuant to the Minnesota Environmental Rights Act and the Minnesota Environmental Policy Act.

EERA staff recommends that the Commission issue a site permit to Flying Cow Wind to construct and operate the up to 152 MW Bitter Root Wind Project in Yellow Medicine County.

Please contact me if you have any questions or concerns.

Sincerely,

William Cole Storm, DOC EERA Staff

ATTACHMENT A – EERA “Track Changes” to the ALJ Report (applicable pages only)

192. Visual sensitivity is a measure of viewer interest and concern for the visual quality of the landscape and potential changes to it, which is determined on a combination of viewer sensitivity and viewer exposure.³⁴⁰ Viewer sensitivity varies for individuals and groups depending on the activities viewers are engaged in, their values and expectations related to the appearance and character of the landscape, and their potential level of concern for changes to the landscape.³⁴¹ High viewer sensitivity is typically assigned to viewer groups engaged in: recreational or leisure activities; traveling on scenic routes for pleasure or to and from recreational or scenic areas; experiencing or traveling to or from protected, natural, cultural, or historic areas; or experiencing views from resort areas or their residences.³⁴² Low viewer sensitivity is typically assigned to viewer groups engaged in work activities or commuting to or from work.³⁴³

193. Because the topography in the vicinity is relatively flat, and the agricultural vegetation has a low profile, objects with comparably high profiles will be potentially viewed as visual disruptions.³⁴⁴ Visual impacts will be most evident to people who live in and near the Project and to people traveling through the Project Area.³⁴⁵ While people living in or traveling through the area are accustomed to viewing wind turbines, the Project will add to the cumulative visual impacts by adding up to 44 new turbines in the area.³⁴⁶

194. Lake Cochrane is located less than one-half mile from the Minnesota South Dakota Boarder³⁴⁷ with the closest turbine (T3) located approximately 1.25 miles to the east. Several turbines will be visible as viewed from the Lake Cochrane Recreation Area.³⁴⁸ Numerous residents of Lake Cochrane have expressed concerns regarding the visual disruption to this natural resource and vigorously oppose locating any turbines within 3 miles of Lake Cochrane.³⁴⁹

195. There are 33 Wildlife Management Areas (WMAs), 27 Waterfowl Production Areas (WPAs) and 1 Scientific and Natural Area (SNA) within 10 miles of the Project.³⁵⁰

196. The turbines will be lit in accordance with minimum FAA regulations.³⁵¹ On March 15, 2018, Flying Cow Wind committed to installing an ADLS, subject to FAA approval of the system.³⁵² The ADLS lighting would control the obstruction of turbine lights so that they only turn on if a plane is detected in the vicinity of the wind farm, thereby balancing safety and local residents' concerns.³⁵³

³⁴⁰ Ex. 110 at 48 (Environmental Report).

³⁴¹ *Id.*

³⁴² *Id.*

³⁴³ *Id.*

³⁴⁴ Ex. 202 at 28 (Site Permit Application).

³⁴⁵ *Id.*

³⁴⁶ *Id.*

³⁴⁷ Canby Tr. at 32 (Ruud).

³⁴⁸ Ex. 214, Flying Cow Wind Visual Simulations, June 22, 2018, eDocket No. 20186-144071-01 to 05, and Lake Cochrane Improvement Association Ron Ruud Declaration (Aug. 6, 2018) (eDocket No. 20188-145563-02).

³⁴⁹ See generally Canby Tr., Public Meeting Tr.

³⁵⁰ Ex. 110 at 49 (Environmental Report).

³⁵¹ Ex. 202 at 49 (Site Permit Application).

³⁵² Comments of Flying Cow Wind (March 15, 2018) (eDockets 20183-141102-01).

³⁵³ *Id.*

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riding, fishing, wildlife refuges, snowmobiling, golf courses, swimming pools, tennis courts, and skiing).⁴¹¹

223. The nearest park is Stonehill Regional Park, which is located approximately 2 miles east of the Project Area.⁴¹² There are five wildlife management areas (WMAs) and two Waterfowl Protection Areas (WPAs) within the Project Area.⁴¹³ There are 33 WMAs, 25 WPAs, and one scientific and natural area (SNA) located within 10 miles of the Project Area.⁴¹⁴

224. In addition, the Lake Cochrane Recreation Area is located one-half mile to the west of the Project in Deuel County, South Dakota,⁴¹⁵ with the closest turbine (T3) located approximately 1.25 miles east of the lake. The South Dakota Department of Game Fish and Parks operates the Lake Cochrane recreation area on the northshore of Lake Cochrane.⁴¹⁶ The recreational area offers camping, cabin lodging, picnic facilities, a playground, and a swimming beach.⁴¹⁷ There is also a well-used walking and running path that circles the lake.⁴¹⁸ There is also a public golf course adjacent to the lake.⁴¹⁹

225. Section 4.5 of the Draft Site Permit provides that wind turbines and associated facilities shall not be located in WMAs, WPAs, SNAs and county parks.⁴²⁰ The Project will avoid all WMAs and WPAs, and has been designed to maintain the three-by-five RD wind access buffer from all public lands.⁴²¹

226. In general, recreational impacts will be visual in nature, affecting individuals using public land near the Project Area for recreation.⁴²²

L. Effects on Agriculture and other Land-Based Economies

i. Agriculture

227. The majority of the Project Area is used for agricultural.⁴²³ Cultivated land comprises approximately 10,636 (46.5%) of the Project Area.⁴²⁴ Pasture land comprises approximately 5,990 acres (26.2%) of the Project Area.⁴²⁵

⁴¹¹ *Id.*

⁴¹² *Id.*

⁴¹³ *Id.* at 45-47.

⁴¹⁴ *Id.*

⁴¹⁵ Canby Tr. at 32 (Ruud).

⁴¹⁶ Public Meeting Tr. at 56 (Ruud).

⁴¹⁷ *Id.*

⁴¹⁸ *Id.*

⁴¹⁹ *Id.*

⁴²⁰ Ex. 108 at 3 (Draft Site Permit).

⁴²¹ Ex. 202 at 47 (Site Permit Application).

⁴²² *Id.*

⁴²³ *Id.* at 52.

⁴²⁴ *Id.*

⁴²⁵ *Id.*

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309. EERA also recommended including the following site permit condition, inserted as Section 4.1, regarding potential impacts to calcareous fens:

4.6.1 Calcareous Fens

Should any calcareous Fens be identified within the project area, the Permittee must work with MN DNR to determine if any impacts will occur during any phase of the Project. If the project is anticipated to impact any calcareous fens, the Permittee must develop a Calcareous Fen Management Plan in coordination with MN DNR, as specified in Minn. Stat. 103G.223. Should a Calcareous Fen Management Plan be required, the approved plan must be submitted to the Commission 30 days prior to the submittal of the site plan required in Section 10.3 of this Permit.

310. EERA also recommended including a condition requiring Flying Cow Wind to incorporate a Threatened and Endangered Species Avoidance Plan into its Prairie Protection and Management Plan required by Section 4.7 of the Draft Site Permit. EERA recommended including the following language at the end of Section 4.7:

A Threatened and Endangered Species Avoidance Plan shall be incorporated into the Prairie Protection and Management Plan outlining the steps that will be taken to avoid impacts to these species and mitigation for any unavoidable impacts.

311. EERA recognized that the Site Permit should also take into consideration the regulatory uncertainty associated with FAA approval of an ADLS system. Accordingly, EERA recommended editing the existing Draft Site Permit language in Section 6.1 as follows:

6.1 Obstruction Marking and Lighting

The Permittee shall install an Aircraft Detection Lighting System (ADLS) to mitigate the aesthetic and visual effects of the FAA's aviation lighting requirements. Permittee may install an FAA approved lighting system without ADLS if the Permittee demonstrates that, despite its reasonable efforts to secure FAA approval for an ADLS, one of the following conditions exists:

- 1) The FAA denies the Permittee's application for an ADLS system, or
- 2) Permittee is unable to secure FAA approval in a timely manner.

If either of these two conditions occur, the permittee's reasonable efforts to secure FAA approval of the ADLS must be described and filed with the Commission 14 days before the pre-construction meeting.

312. EERA also recommended that the Commission not adopt the three mile set-back from Lake Cochrane as the project has been designed to comply with the Setbacks, and Requirements and Standards of the Yellow Medicine County Land Use and Related Resource Management Ordinance, which includes management directives related to floodplains, shore-land, rural preservation, and renewable energy.

The Administrative Law Judge's suggested changes

Based on these Findings of Fact, the Administrative Law Judge makes the following:

⁶³¹ Minn. Stat. § 216B.03.

⁶³² Minn. R. 7854.0500, subp. 7(C).

⁶³³ *Id.*, subp. 7(F).

⁶³⁴ *Id.*, subp. 7(J).

⁶³⁵ *Id.*, subp. 7(R).

⁶³⁶ DOC-EERA in the EA considered the effect of sound on the Lake Cochrane area. See Ex. 211 at 6 (Sound Modeling Assessment).

⁶³⁷ Ex. 214 (Flying Cow Wind Visual Simulations); Lake Cochrane Improvement Association Ron Ruud Declaration (Aug. 6, 2018) (eDocket No. 20188-145561-02).

⁶³⁸ Ex. 110 at 62 (Environmental Report).

⁶³⁹ *Id.* at 50.

⁶⁴⁰ See Canby Tr. at 55-56 (Ruud) (208 cabins/houses and 10,000 annual visitors).

⁶⁴¹ Flying Cow Wind has eight alternative turbine locations. See Ex. 210 at 1-2 (Site Permit Addendum).

⁶⁴² See Ex. 110 at Figures 2, 4 (Environmental Report).

Deleted: As noted above, an LWECs must be sited in an orderly manner compatible with environmental preservation, sustainable development, and efficient use of resources.⁶³¹ The law requires the Commission to consider, among other things, the following environmental impacts of the Project: (1) visual impacts,⁶³² (2) recreational resources,⁶³³ (3) tourism and community benefits,⁶³⁴ and (4) rare and unique natural resources.⁶³⁵¶

¶ There is nothing in the law that limits consideration of these impacts to just Minnesota.⁶³⁶ The record demonstrates that several of the proposed turbines in the Project would dominate the landscape and create an immense visual impact for all viewers near Lake Cochrane.⁶³⁷ This visual impairment would damage Lake Cochrane's recreational resources, arguably lower property values around the lake, and impact tourism, the benefits it provides to the community, and Lake Cochrane's status as a unique natural resource.¶

¶ In the Environmental Report, DOC-EERA noted that in situations where property values may be negatively impacted, such impacts can be mitigated by siting turbines away from such residences.⁶³⁸ DOC-EERA also noted that aesthetic impacts can be mitigated by siting the wind turbines outside of these areas to reduce the visual intrusions.⁶³⁹ Given the number of homes and cabins surrounding Lake Cochrane, and the high number of annual visitors, mitigation seems appropriate here.⁶⁴⁰¶

The Administrative Law Judge, therefore, recommends the Commission require the removal of turbines, A2, T35, T2, and T3.⁶⁴¹ These four turbines are significantly closer to Lake Cochrane than any other turbines in the Project.⁶⁴² Flying Cow Wind may use the alternative locations to relocate these four turbines.¶

¶ Any of the above Findings of Fact more properly designated as Conclusions of Law are hereby adopted as such.¶

CONCLUSIONS OF LAW

1. The Commission and the Administrative Law Judge have jurisdiction over the site permit applied for by Applicant for the up to 152 MW Project pursuant to Minn. Stat. § 216F.04.

2. Flying Cow Wind has complied with the procedural requirements of Minnesota Statutes chapter 216F and Minnesota Rules chapter 7854.

3. The Commission has complied with all procedural requirements of Minn. Stat. ch. 216F and Minn. R. ch. 7854.

4. A public hearing was conducted in Canby, a community near the Project. Proper notice of the public hearing was provided, and the public was given the opportunity to speak at the hearing and submit written comments.

5. The Commission has the authority under Minn. Stat. § 216F.04 to place conditions in a LWECs site permit.

6. It is reasonable and appropriate to amend the Draft Site Permit to include the changes agreed to between Applicant and DOC-EERA regarding conditions 6.1 (Obstruction Marking and Lighting), 4.6.1 (Calcareous Fens), 4.7 (Threatened and Endangered Species Avoidance Plan), and 10.4.1 (Labor Statistics Report).

7. The Draft Site Permit contains a number of important mitigation measures and other reasonable conditions.

9. The Project, with the Draft Site Permit conditions revised as set forth in [EERA's Comments and Recommendations](#), satisfies the site permit criteria for a LWECs contained in Minn. Stat. § 216F.03 and meets all other applicable legal requirements.

10. The Project, with the permit conditions [as set forth in EERA's Comments and Recommendations](#), is compatible with environmental preservation, sustainable development, and the efficient use of resources.

11. The Project, with the permit conditions [as set forth in EERA's Comments and Recommendations](#), does not present a potential for significant adverse environmental effects pursuant to the Minnesota Environmental Rights Act and the Minnesota Environmental Policy Act.

12. Any of the above Conclusions of Law more properly designated as Findings of Fact are hereby adopted as such.

Deleted: ~~object~~ Removal of Turbines A2, T35, T2, and T3 is necessary for the Project to be compatible with environmental preservation and the efficient use of resources.¶

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Exceptions**

Docket No. IP 6984/CN-17-676 and IP6984/WS-17-749

Dated this **10th** day of **September 2018**

/s/Sharon Ferguson

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