



**DEPARTMENT OF
NATURAL RESOURCES**

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

March 16, 2017

[Electronic Submittal]

Michael Kaluzniak
Project Analyst
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Red Pine Wind Project, LLC for a Site Permit
for the up to 200.1-Megawatt Red Pine Wind Project in Lincoln County
Public Utilities Commission (PUC) Docket Numbers: IP-6646/WS-16-618
Office of Administrative Hearings (OAH) Docket Number: 82-2500-34034

Dear Mr. Kaluzniak,

The Minnesota Department of Natural Resources (DNR) has reviewed the Draft Site Permit for the proposed Red Pine Wind Project in Lincoln County.

Project Updates

The DNR's primary concerns regarding the proposed project, including calcareous fens and turbine siting, have been addressed through ongoing coordination with EDF Renewable Energy (EDF). The applicant's consultant has conducted a detailed investigation to determine the potential presence of calcareous fens within the project area. Based on the Calcareous Fen Evaluation letter dated February 8, 2017 and discussions with EDF, we concur that no impacts to calcareous fens are anticipated and a Calcareous Fen Management Plan is not required.

The DNR's concerns regarding the proximity of turbines 43, 59, and 73 to sensitive resources have been resolved. Turbines 43 and 59, originally sited close to a rookery on Hawk's Nest Lake, have been eliminated. Turbine 73 has been made an alternate and moved 200 feet farther from the large wetland located within a permanent Reinvest in Minnesota (RIM) conservation easement. The DNR appreciates EDF's responsiveness to the DNR's recommendations regarding turbine siting.

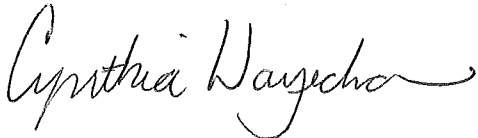
EDF has consulted with the DNR to update the Avian Bat Protection Plan (ABPP). Due to the high risk nature of the site, two years of fatality monitoring are required. The first year will follow DNR protocol, which recommends a search frequency of four days a week for cleared plot search areas and once a week for road and pad search areas, from March 15 through November 15. Protocol for the second year will be developed based on the results of the first year of monitoring. EDF's coordination with the DNR is expected to be ongoing as details of the ABPP are refined.

Recommendation

During consultation on the ABPP, the DNR recommended that language used in the ABPP regarding the feathering of turbine blades be consistent with the language included in Section 5.5.4 *Turbine Operation Curtailment Requirements* of the Draft Site Permit. However, the ABPP filed with the Commission on March 2, 2017 characterizes feathering turbine blades as a *voluntary* operation measure to minimize bat fatalities. The DNR recommends the language used in the Draft Site Permit (Section 5.5.4), that requires feathering, be used in the ABPP.

The DNR appreciates the coordination that has occurred with EDF and the Department of Commerce regarding natural resources for this project. If you have any questions, please contact me at 651-259-5078.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Warzecha".

Cynthia Warzecha
Principal Planner
Environmental Review Unit

CC: Barbara Case, Office of Administrative Hearings
Richard Davis, Department of Commerce
Shanelle Montana, EDF Renewable Energy Inc.