



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

[Electronic Submittal]

July 11, 2018

Charley Bruce, Public Advisor
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Applications of Nobles 2 Power Partners, LLC for a Site Permit for the up to 260 MW Nobles 2 Wind Project and Associated Facilities in Nobles County, Minnesota
Commission Docket Number: IP6964/WS-17-597, OAH Docket Number: 71-2500-35110

Dear Mr. Bruce,

The Minnesota Department of Natural Resources (DNR) has reviewed the draft site permit for the Nobles 2 Wind Project in Nobles County. We offer the following comments and recommendations for your consideration:

It is our agency's understanding that the great blue heron rookery identified in the site permit application is approximately 10.9 miles from the nearest turbine. Therefore, no further review of the rookery is necessary.

The DNR's comment letter (March 20, 2018) recommended that, in the absence of moving an adequate number of turbines to achieve a low risk designation, Nobles 2 post-construction fatality monitoring would require inclusion of three turbines near the WMAs. The direct testimony of Joseph Finocchiaro states that Nobles 2 is willing to revise its post-construction monitoring protocol to include monitoring of three turbines near the WMAs. The DNR encourages timely modification of the Bird and Bat Conservation Strategy to reflect the site's moderate risk level and the changes in monitoring protocol, including a minimum of two search days per week for fatality monitoring rather than one day per week.

Native prairie has been identified within the site boundaries. Hence, the DNR advises that preparation of a prairie protection and management plan in consultation with our agency is needed per section 4.7 of the draft site permit.

Other issues brought forth during project coordination have been adequately addressed.

The DNR appreciates the opportunity to comment on the draft site permit. If you have any questions regarding our agency's review of the document, please contact me at cynthia.warzecha@state.mn.us or 651-258-5078.

Sincerely,

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

Cynthia Warzecha
Energy Projects Planner
Environmental Review Unit

EC: Michael Kaluzniak, Minnesota Public Utilities Commission
David Birkholz, Minnesota Department of Commerce
Scott Seier, Nobles 2 Power Partners
Kevin Mixon, Minnesota Department of Natural Resources
ERDB #20160294