

Minnesota Department of Natural Resources

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December 27, 2013

Richard Davis, Environmental Review Manager
Energy Environmental Review and Analysis
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

Re: Site Permit Application for the Odell Wind Farm
PUC Docket Number: IP-6914/WS-13-843

Mr. Davis:

The Minnesota Department of Natural Resources (DNR) has reviewed the Site Permit Application for the Odell Wind Farm in Cottonwood, Jackson, Martin and Watonwan Counties. The DNR has also reviewed bat acoustic monitoring data for the Odell Wind Farm and offers the following comments.

Due to the siting of Odell Wind Farm turbines in areas that avoid natural resource features such as native plant communities and conservation lands, and based on recently submitted acoustic bat monitoring results, the DNR estimates that the risk of affects to avian and bat species appears low. However, the DNR is concerned that the site is located in the vicinity of wind projects where early fatality monitoring results indicate higher than expected bat fatality results. Therefore, it is important that the Site Permit require fatality surveys.

The DNR suggests requiring the attached survey protocol developed for low risk sites. The attached low risk survey protocol summary should be considered an update to the February 19, 2013 Draft Avian and Bat Survey Protocols for Large Wind Energy Conversion Systems in Minnesota, while the final draft of this document is being completed, and both should be used as a reference for developing the Avian and Bat Protection Plan (ABPP). The attached summary of low risk protocols includes minimum numbers of turbines to search. Due to the larger number of turbines at the Odell Wind Farm, the DNR recommends the following protocols above the minimums as appropriate for this site:

- For the full plots only search option, 15 – 20 turbines should be searched (rather than the minimum of 10).
- For the option of combining road and pad searches with full plot searches, full plots should be searched at 5 turbines, and roads and pads should be searched at 50 turbines (rather than the minimum of 40 road and pad turbine searches).

DNR reviewers would appreciate the opportunity to comment on the upcoming ABPP for the Odell Wind Farm. Survey protocol should be described in detail, rather than referenced, in the ABPP.

Using a third party surveyor to conduct fatality monitoring is recommended and should also be discussed in the ABPP.

The Site Permit Application describes four turbine models under consideration ranging from 1.5 MW to 2.0 MW, resulting in 100-133 turbines in the project area. Based on our current knowledge of possible natural resource impacts, the DNR supports the use of fewer turbines to reduce the number of access roads and other infrastructure needed to support turbines. Fewer of the larger model of turbines may also reduce the overall collision risk per megawatt compared to a greater number of the relatively smaller model of turbines.

The DNR appreciates the coordination that has occurred with Odell Wind Farm, LLC and the Department of Commerce regarding natural resources for this project. Thank you for the opportunity to review the Site Permit Application for the Odell Wind Farm. Please contact me with any questions.

Sincerely,



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Enclosures: 1

C: Michael Kaluzniak, Minnesota Public Utilities Commission
Patrick Smith, Odell Wind Farm, LLC
Kevin Mixon, DNR