

- Turbine (91m rotor diameter)
- Turbine (97m rotor diameter)
- Turbine (136m rotor diameter)
- Residential Structure (within 1 mile of Project Area Boundary)
- Existing Substation
- Project Boundary
- O&M Area
- Project Substation
- Proposed Crane Path
- Snowmobile Trail
- Existing Transmission Line
- Public Water Watercourse
- Existing Lease Agreement
- Wind Rights Only (in process)
- Wildlife Management Area (WMA)
- Public Water Basin

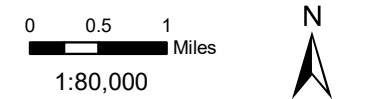
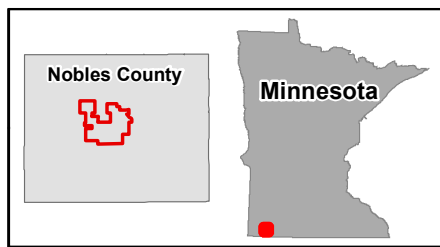
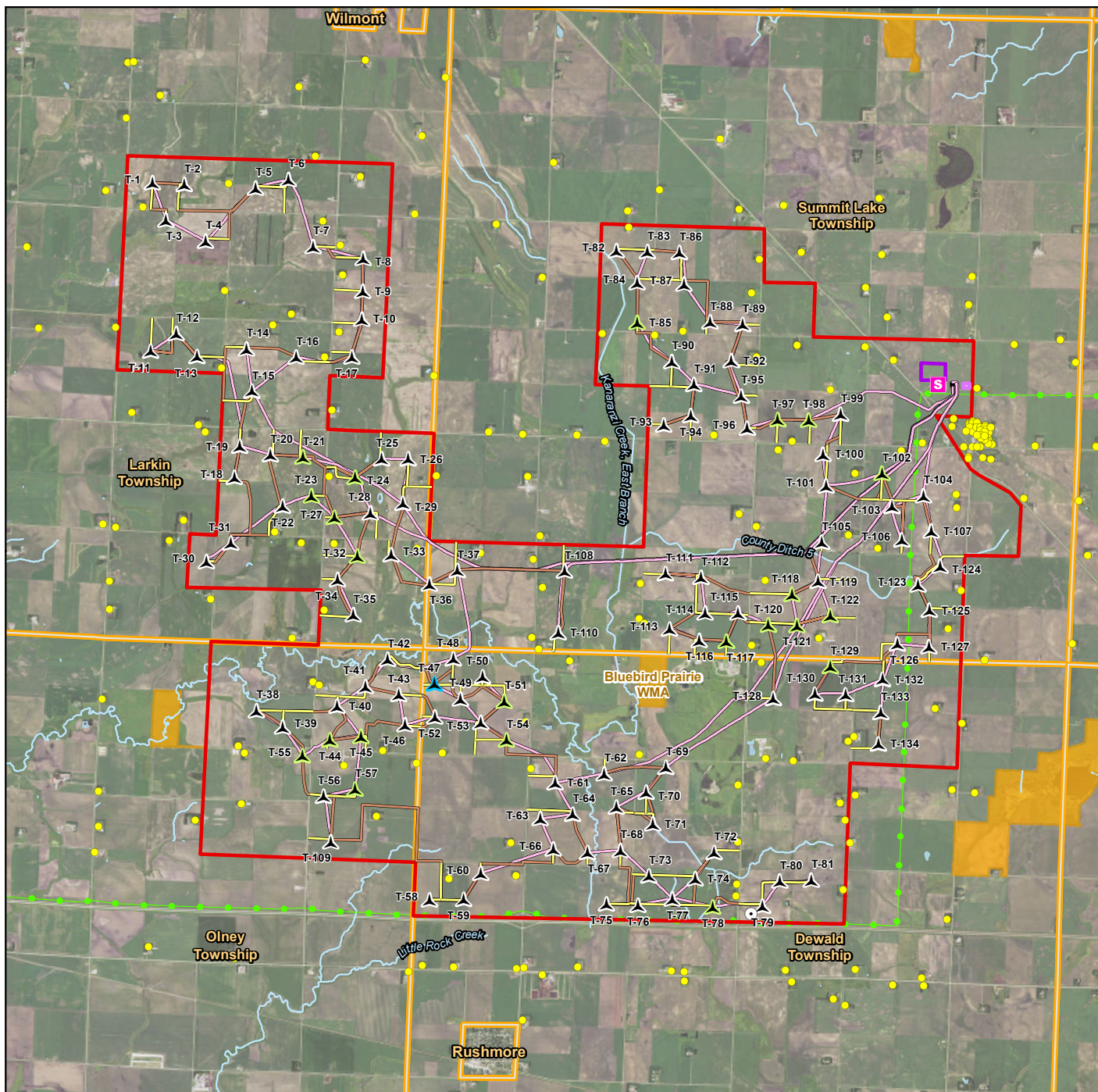
Data Source: Xcel Energy, US Census, MDOT, USGS

Figure 3
Wind Access Buffer
Setbacks
Nobles Repower Project
Nobles County, Minnesota



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- Turbine (91m rotor diameter)
 - Turbine (97m rotor diameter)
 - Turbine (136m rotor diameter)
 - Residence (within 1 mile of Project Boundary)
 - Permanent Met Tower
 - Nobles County Substation
 - Proposed Crane Path
 - Access Road
 - Collection Line
 - River/Stream
 - Existing 345 kV Transmission Line
 - Project Boundary
 - O&M Area
 - Project Substation
 - City/Township
 - Laydown Area
 - Lake, Pond or Reservoir
 - Wildlife Management
- Data Source: Xcel Energy, US Census, MDOT, MDNR, 2019 NAIP*

**Figure 4
Project Area and
Facilities**

Nobles Repower Project

Nobles County, Minnesota

RESPONSIBLE BY NATURESM

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Division of Ecological & Water Resources
Region 4 (Southern Region)
21371 Highway 15 South
New Ulm, MN 56073

December 2, 2020

Matthew Langan
Excel Energy
Matthew.A.Langan@xcelenergy.com

Subject: DNR Early Coordination Comments for Nobles Wind Repower

Dear Matthew,

This letter includes DNR's early coordination review comments of the proposed Nobles Wind Repower project in response to a 11/2/20 review request and shapefile project information received 11/4/20 (footprint and turbines) and 11/20/20 (crane paths). The proposed project, located in central Nobles County, is to retrofit 134 turbines with larger rotors and different nacelles to increase energy yield and extend the life of the project. The originally permitted wind towers, access roads, and collection lines will be used, but road/intersection upgrades and temporary impacts including crane paths and a laydown yard will occur. This project is located along the peak of the Prairie Coteau, a substantially wind-developed area within Minnesota. This is a high priority conservation region in the [MN Wildlife Action Plan](#), the [MN Prairie Conservation Plan](#), and the [Missouri River One Watershed One Plan](#).

General Guidance and Recommendations

The project should review and integrate the [MNDNR Guidance for Commercial Wind Energy Projects](#). Several natural resource GIS data layers are available on the [Minnesota Geospatial Commons](#) including Native Plant Communities, Public Waters, and MBS Sites of Biodiversity Significance to assist in your project planning. Additional resources are also available from conservation groups such as the [The Nature Conservancy's Site Wind Right](#). Since most of the project components are already in place, most avoidance strategies apply to the temporary impacts associated with the project.

The Public Utilities Commission (PUC) protects non-participating landowners through the wind access buffer of 5 rotor diameters (prevailing wind direction) and 3 rotor diameters (non-prevailing wind direction). The only public land identified within the project footprint is Blue Bird WMA (Herlein-Boote and Van Drie Ridge WMAs are just outside of the project footprint area). At about 0.2 miles to the closest turbine, we are not identifying any issues with this setback in regards to State owned lands, but ensure this requirement is met for private lands as well.

NHIS Review, Rare Species, and Habitat Protection

The MNDNR recommends or requires (depending on the specific type of species/community impact) avoidance of rare species, communities, and features in accordance with [Minnesota Rules Chapter 6134](#). A Natural Heritage Information System (NHIS) review provides direction on these rare species/communities. The NHIS review must be completed and plans to avoid impacts should be in place prior to submitting the PUC application. The NHIS review can be requested using the form on the [NHIS review webpage](#). The NHIS review results are valid for one year. Please note that generally the DNR prefers for NHIS reviews to proceed early coordination review. As such, some NHIS issues may be referred to in this letter, but the NHIS review may provide more specific requirements.

Several natural resources (i.e. native plants, sites of biodiversity significance, mussels, Topeka shiners, other Species in Greatest Conservation Need) have been identified adjacent to the East Branch of Kanaranzi Creek. Overall, the proposed project crane paths seem to consider this and other resource-rich areas within the project boundary. However, some areas (e.g. crane path between towers 61 and 62 adjacent native plant communities) appear to come excessively close to high value resources despite an adjacent road. We recommend that wherever possible, any resources are avoided by using already established roads or access roads.

The project area is within the Rock River watershed and the East Branch Kanaranzi Creek subwatershed, a designated critical habitat for the federally protected and state special concern species [Topeka Shiner](#). The project should consult with the USFWS. Generally, avoidance practices for this species include those that avoid impacts or degradation of the stream, habitat, or water quality within streams. Specific recommendations are found in the USFWS' [Recommendations for Projects Affecting Waters Inhabited by Topeka Shiners in Minnesota](#).

The State Threatened [Blanding's Turtle](#) has not been specifically identified in this project boundary; however, its habitat often overlaps with Topeka Shiner habitat. This species depends upon both upland and aquatic habitats, moving between them. On-site workers should be provided the Blanding's Turtle ID and Reporting Factsheet (attached) and be vigilant for Blanding's turtles. If a Blanding's turtle is observed within the project area, please document its location and promptly notify the MNDNR Southern Region Nongame Wildlife Specialists who will provide further guidance, as needed. If a Blanding's turtle is in danger of imminent or likely harm, the turtles should be transferred by hand (Blanding's turtles don't bite, hold them by their shells, not by their tails or legs) to a safe, nearby location beyond project activities or other hazards. Turtles which are not in imminent danger should be left undisturbed. Many practices that generally protect stream, wetland, and upland habitat will also help protect Blanding's turtles, although additional measures may be required depending upon site and project specific circumstances. More information and specific recommendations are provided in the [Blanding's Turtle Fact Sheet](#).

We generally recommend wildlife friendly erosion control and invasive species prevention practices (attached) to minimize risks to aquatic and terrestrial habitats.

Bat and Bird Protection

The project proposer will need to prepare an Avian and Bat Protection Plan (ABPP a.k.a. Bird and Bat Conservation Strategy) per [US Fish and Wildlife Service Land-Based Wind Energy Guidelines](#) to identify and document measures to avoid and minimize risks to rare species. After the Tier 1 and Tier 2 Evaluations, we can

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Nobles Wind Repower - Early Coordination DNR Comments

3

discuss if any additional surveys are recommended. The ABPP should include, as an Appendix, a post-construction fatality monitoring plan to assess project impacts using the [Minnesota Avian and Bat Survey Protocols for Wind Energy Projects](#).

Recent Minnesota Public Utilities Commission site permits have required that all turbines are locked or feathered up to the manufacturer's standard cut-in speed from one-half hour before sunset to one-half hour after sunrise from April 1 to October 31 of each year of operation. Site permits also state that operating turbines must be equipped with operational software capable of adjusting turbine cut-in speeds. The MNDNR supports this site permit requirement.

Waterbodies

Several public water streams, their floodplains, and many other smaller flow paths are within the project boundary. Some National Wetland Inventory wetlands and sensitive groundwater areas are also located within the project boundary. Any crossings of public waters will require a [DNR Utility Crossing License](#). If any dewatering or water appropriations are necessary, we encourage early coordination with DNR Hydrologists when applying for [Water Appropriation Permit](#) due to sensitive groundwater and surface water features found in and near the project area. The project should work with the appropriate authority (typically the county) to ensure any Wetland Conservation Act, flood plain, or other local environmental requirements are fulfilled.

Conclusion

We look forward to working with you on this in a positive and collaborative manner to ensure that sustainable energy sources are developed while protecting Minnesota's natural resources. Please contact me if you have any questions about these comments.

Sincerely,



Joanne Boettcher

Regional Environmental Assessment Ecologist

cc:

Cynthia Warzecha, Energy Project Planner

Megan Benage, Regional Ecologist

Lisa Gelvin-Innvaer, South District Nongame Wildlife Specialist

Brent Beste, Groundwater Protection Hydrologist

Tom Kresko, Area Hydrologist

Ryan Doorenbos, Area Fisheries Supervisor

Bill Schuna, Area Wildlife Supervisor

Todd Kolander, EWR South District Supervisor

Tim Gieseke, EWR Assistant Regional Manager

Robb Collett, EWR Regional Manager

Nick Utrup, USFWS

Dawn Marsh, USFWS



HAVE YOU SEEN A BLANDING'S TURTLE ?

State-listed Threatened Species



Carapace



Male=concave Plastron Female=flat

Carapace (upper shell): Round, dome-shaped, very smooth, dull black with specks and streaks of yellow throughout.

Plastron (lower shell): Yellow with dark splotches on each scute (section); hinged between 3rd and 4th pair of scutes (front closes like a drawbridge) So the Blanding's turtle is sometimes called a "semi-Box Turtle"

The **bright yellow chin and underside of the long neck** is one of the most conspicuous features of this turtle.

Marshes, ponds, rivers & streams, adjacent uplands; Also travel overland & cross roads. May bask on logs, shore



Yellow neck/chin; no stripes



Domed Carapace

The MNDNR Nongame Wildlife Program (NWP) is seeking reports of **Blanding's turtles** in the counties of southern Minnesota*.

If possible, sightings should be verified promptly by either:

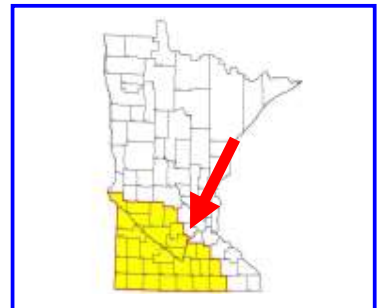
1. photographs showing identifying characteristics (top & bottom of shell, jaw) AND/OR
2. a detailed written description specifying identifying characteristics and circumstances of the sighting. (incl. if turtle shell is marked in any way)

Please include:

- Name phone number &/or email address of person reporting sighting
- Date of Sighting
- Number of Blanding's turtles observed
- Specific Location of Sighting
e.g. GPS coordinates OR Township, Range Section to the nearest ¼ ¼ section &/OR
- Specific directions (e.g. roads with distance and direction from nearest town or other conspicuous landmark with any other information that may be helpful for locating the site. Details about the habitat & landowner contacts also really help. **Many Thanks !**

Please Report Sightings as soon as possible to:

MNDNR Nongame Wildlife Program- Southern Region
Lisa Gelvin-Innvaer, Phone: 507-233-1254 Email: lisa.gelvin-innvaer@state.mn.us
Mike Worland Phone: 507-362-8786 Email: michael.worland@state.mn.us



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Standard Erosion Control and Invasive Species Prevention Best Practices

Take precautions when working near waterbodies to prevent sedimentation and erosion:

- Erodible surfaces should not be left exposed for greater than one day. For example, work should not commence late in the week if it will be left unfinished over a weekend.
- Work should not commence if rain is predicted.
- All wheeled or tracked construction equipment should be restricted to work areas above the stream bank.
- Fill material should not be stockpiled in the floodplain.
- Backfill placed below Ordinary High Water (OHW) should consist of clean granular material free of fines, silts, soils, and mud.
- Use [Best Practices for DNR General Public Waters Work Permit GP 2004-0001: Species Protection](#). Refer to pages: 3, 11, 14, 16, 25, 33, and 34 as relevant to a particular project.
- Vegetative “grout” should be incorporated with any installed rip rap (see page 33 of above link).
- [Native species planting/seeding](#) should be used.
- DNR Public Waters Work Permit may be required. Permit requirements must be followed.

Use wildlife friendly erosion control:

- Biodegradable netting should be used, preferably natural materials with short degradation periods.
- Erosion control blankets should be limited to bio-netting or natural netting types due to the risk of entanglement and death of small animals. [2018 MnDOT Standards Specifications for Construction](#) identify acceptable materials in Category 3N or 4N mulches.
- Do not use products that require UV-light to degrade (also called “photodegradable”), as they do not degrade properly when covered/shaded.
- Do not use products containing plastic mesh netting or other plastic components.
- Do not use mulch products that contain synthetic (plastic) fiber additives near waterbodies.
- See [Wildlife Friendly Erosion Control](#) for more information.

Take active steps to prevent invasive species introduction and spread:

- Clean all equipment (including but not limited to: vehicles, clothing, and gear) at a site prior to moving to another site. All soil, aggregate material, mulch, vegetation, seeds, animals, etc. need to be removed using a hand tool, brush, compressed air, pressure washer, or otherwise.
- If equipment is not cleaned before arriving to a work site, then clean the equipment in the parking or staging area, ensuring no material is deposited at the new site. Material cleaned from equipment should be disposed of legally.
- All equipment (including but not limited to: waders, tracked vehicles, barges, boats, turbidity curtain, sheet pile, and pumps) used for work in an “infested water” must be adequately decontaminated. See [Watercraft Decontamination Manual](#) for more information.
- See [Come Clean, Leave Clean](#) for more detailed guidance. This guidance is required for those working on DNR lands as part of grant or contract or are working under a permit, your grant, contract, or permit.

Referenced Links

https://files.dnr.state.mn.us/waters/watermgmt_section/pwpermits/gp_2004_0001_chapter1.pdf

<https://bwsr.state.mn.us/seed-mixes>

<https://files.dnr.state.mn.us/eco/nongame/wildlife-friendly-erosion-control.pdf>

<http://www.dot.state.mn.us/pre-letting/spec/2018/2018-spec-book-final.pdf>

<https://www.dnr.state.mn.us/invasives/dnrlands.html>

<https://www.dnr.state.mn.us/invasives/dnrlands.html>

https://files.dnr.state.mn.us/natural_resources/invasives/mndnr_ais_decontamination_handbook.pdf