Minnesota Department of Natural Resources

Minnesota

500 Lafayette Road • St. Paul, MN • 55155-40

December 12, 2013

Burl Haar, Executive Secretary Minnesota PublicUtilities Commission 121 7th Place East, Suite 350 St. Paul MN 55101-2147

Re:

Site Permit Amendment - Pleasant Valley Wind

PUC Docket Number: IP-6828/WS-09-1197 (Site Permit)

Dr. Burl Haar:

The Minnesota Department of Natural Resources (DNR) has reviewed the Petition for a Site Permit Amendment submitted by Pleasant Valley Wind, LLC and submits the following comments for your consideration.

The last record of a Natural Heritage Review for the Pleasant Valley Wind Project was 2009. The project boundary has expanded from the boundary reviewed in 2009 and the 2009 review identified known occurrences of state-listed threatened and endangered plants within the 2009 project boundary. The DNR requests assurance that these previously reviewed locations will be avoided. Also, the current project boundary needs to be reviewed for possible new locations of threatened and endangered species. With construction nearing, it is important that Pleasant Valley Wind, LLC submit a Natural Heritage Information System (NHIS) Request or a request for DNR concurrence with the company's interpretation of data obtained through a license as soon as possible.

Regarding updating the review of NHIS data, in recent discussions with Pleasant Valley Wind representatives, Pleasant Valley clarified that project biologists are working on obtaining and reviewing updated data for Dodge and Mower Counties through their NHIS license. If data is obtained through a license rather than a NHIS review request to the DNR, the DNR is interested in reviewing the company's interpretation of the data to offer concurrence or comments for this project as soon as that interpretation is available. Further coordination on this topic can be directed to Lisa Joyal, NHIS coordinator, at 651-259-5109.

As Site Permit Amendment reviews have a shorter commenting opportunity than the full permit review process, DNR review would be more efficient, for future projects, if a Geographic Information System (GIS) shapefile of proposed layout changes were provided by the permittee at the time of the amendment petition.

The DNR is also currently working with Pleasant Valley Wind, LLC and the Department of Commerce regarding the drafting of an Avian and Bat Protection Plan/Bird and Bat Conservation Strategy for this project.

Thank you for the opportunity to provide comments regarding the Site Permit Amendment for the Pleasant Valley Wind Project.

Sincerely,

Jamie Schrenzel Principal Planner

Environmental Review Unit

(651) 259-5115

