



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

January 26, 2021

Suzanne Steinhauer, Environmental Review Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul MN 55101

**RE: Walleye Wind Project and Associated Facilities in Rock County  
PUC Number: WS-20-384**

Dear Ms. Steinhauer,

Minnesota Department of Natural Resources (DNR) staff have reviewed the amended site permit application (filed November 4, 2020) for the Walleye Wind project in Rock County. Our agency offers the following comments and recommendations:

**Public Waters**

A license must be obtained from the DNR for the passage of any utility crossing over, under, or across any state land or public water. The permit application identifies eight public watercourses within the project boundary. The list of potential permits and approvals in Table 53 includes a License to Cross Public Lands and Waters “if needed.” Based on the surface waters map, it looks as though collection lines cross public waters in at least five locations. In addition, a crane path appears to cross a public water (unnamed stream - tributary to Beaver Creek). Our agency advises the applicant to contact Karla Ihns, DNR Realty Specialist, regarding the licensing process.

A DNR Public Waters Work Permit is required to change or diminish the course, current, or cross section of public waters by filling, excavating, or placing materials in or on the bed of public waters. A permit may be required if a crane path crosses a public water. Our agency advises the applicant to contact Tom Kresko, DNR Area Hydrologist, regarding the permitting process.

**Buffalo-Ridge Snowmobile Trail**

The permit application states that the project may require “temporary closing or relocating of part of the snowmobile trails to ensure the safety of construction personnel and recreationists during construction activities.” The best way to avoid impacts to the Buffalo-Ridge Snowmobile Trail would be

to avoid construction activities from December 1 through April 1. If this timeframe is not feasible, the applicant will need to coordinate with the snowmobile club early on to allow time to accommodate changes to the snowmobile trail/route. Statewide snowmobile routes are finalized by mid-summer and are not normally changed. Snowmobilers incorporate the route maps as Apps on their phones and any route changes can cause safety issues. The DNR recommends that the applicant contact Phil Nasby, DNR Parks and Trails Area Supervisor, and Greg Vande Velde, Rock County Sno-Masters Trail Boss, to coordinate any route changes.

Please note that snowmobile trails are funded through a Grant-in-Aid program run through DNR Parks and Trails. Applications are prepared annually and are due on May 15. Part of this process is the review of the trail itself and any re-routes or changes that may be needed for the following year (for example, the application due May 15, 2021 is for the trail seasons December 1, 2021 through April 1, 2022).

### **Dewatering**

The permit application does not mention vulnerable groundwater areas, which DNR groundwater staff may consider if construction dewatering permits are necessary. Please contact Tom Kresko, DNR Area Hydrologist, if dewatering permits are needed.

### **Turbine Feathering**

The permit application states that Walleye Wind will coordinate with the DNR regarding potential minimization measures, such as the feathering of turbine blades up to the manufacturer set cut-in speed “at night.” The sample site permit states that the “Permittee shall operate all facility turbines so 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 of the following day from April 1 to October 31 of each year of operation.” The DNR supports this requirement.

### **Blanding’s Turtles**

Although the Natural Heritage Information System (NHIS) does not identify records of Blanding’s turtles within one mile of the project area, the DNR has preliminary reports of the turtles moving into many of the same creeks as the Topeka shiner. Our agency recommends that the applicant continue to coordinate with DNR staff to address potential impacts to Blanding’s turtles.

### **Erosion Control and Invasive Species Preventions Best Practices**

The DNR recommends wildlife friendly erosion control and invasive species preventions best practices (see attachment).

### **Contacts**

Karla Ihns	DNR	507-233-1210	karla.ihns@state.mn.us
Tom Kresko	DNR	507-832-6045	tom.kresko@state.mn.us
Phil Nasby	DNR	507-832-6031	phil.nasby@state.mn.us
Greg Vande Velde	Sno-Masters	507-920-5189	gcvande@hotmail.com

The DNR appreciates the opportunity to review the Walleye Wind project. If you have questions about our agency's comments, I may be reached at [cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us) or 651-259-5078.

Sincerely,

/S/ Cynthia Warzecha  
Energy Projects Planner

Attachment: Standard Erosion Control and Invasive Species Prevention Best Practices

CC: Mike Kaluzniak, Minnesota Public Utilities Commission  
Mike Weich, NextEra Energy  
Joanne Boettcher, Minnesota Department of Natural Resources  
ERDB #20210145