



January 3, 2018

**Via Electronic Filing**

Mr. Daniel Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: *In the Matter of the Application of Palmer's Creek Wind Farm LLC for a Large Wind Energy Conversion System Site Permit for the 44.6 MW Palmer's Creek Wind Project in Chippewa County, Minnesota. Docket No. IP-6979/WS-17-265***

Dear Mr. Wolf:

In accordance with section 4.7 of the draft Site Permit for Palmer's Creek Wind Farm, Palmer's Creek respectfully submits the attached Native Prairie Protection Document prepared by Wenck .

Sincerely,

Kate Carlton  
Corporate Counsel  
Fagen Incorporated  
P.O. Box 159  
Granite Falls, MN 56241



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Exceptional outcomes.

December 29, 2017

**Mr. Daniel Wolf**

Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: Palmer's Creek Wind Farm, LLC  
Chippewa County, MN  
MPUC Docket No.: 17-265**

**Mr. Wolf:**

Palmer's Creek Wind Farm, LLC. (Palmer's Creek) has considered native prairie as an avoidance feature from the early stages of project planning, and has coordinated with the Minnesota Department of Natural Resources (DNR) to determine the presence of potential prairies and other sensitive resources within the area. This included a DNR Natural Heritage Information Systems (NHIS) database review on July 5, 2016 and subsequent meetings, DNR comments, and coordination and correspondence with DNR. As defined by Minn. Stat. 84.02, subd. 5:

"Native prairie" means land that has never been plowed where native prairie vegetation originating from the site currently predominates or, if disturbed, is predominantly covered with native prairie vegetation that originated from the site. Unbroken pasture land used for livestock grazing can be considered native prairie if it has predominantly native vegetation originating from the site and conservation practices have maintained biological diversity.

The Draft Site Permit (Section 4.7) for Palmer's Creek states the following regarding native prairie:

**4.7 Native Prairie**

*Wind turbines and associated facilities including foundations, access roads, collector and feeder lines, underground cable, and transformers shall not be placed in native prairie, as defined in Minn. Stat. § 84.02, subd. 5, unless addressed in a prairie protection and management plan and shall not be located in areas enrolled in the Native Prairie Bank Program. Construction activities, as defined in Minn. Stat. § 216E.01, shall not impact native prairie unless addressed in a prairie protection and management plan.*

*The Permittee shall prepare a prairie protection and management plan in consultation with the Minnesota Department of Natural Resources if native prairie, as defined in Minn. Stat. § 84.02, subd. 5, is identified within the site boundaries. The Permittee shall file the plan 30 days prior to submitting the site plan required by Section 10.3 of this permit. The plan shall address steps that will be taken to avoid impacts to native prairie and mitigation to unavoidable impacts to native prairie by restoration or management of other native prairie areas that are in degraded condition, by conveyance of conservation*

**Mr. Rich Davis**  
State Site Permit Manager  
Minnesota Department of Commerce  
December 29, 2017



*easements, or by other means agreed to by the Permittee, the Minnesota Department of Natural Resources, and the Commission.*

In response to comments during the Draft Site Permit process, Palmer's Creek has committed to avoidance and minimization measures for areas of native prairie. Specifically, comments from the DNR on July 6, 2017 identified DNR Prairie Native Plant Community (upland prairie) where a collector line runs between Wind Turbine Generator (WTG) 17 and WTG 18 (**Figures 1 and 2**). DNR further indicated that a Minnesota Biological Survey (MBS) Site of Moderate Biodiversity Significance surrounds this upland prairie. The required DNR utility-crossing license will require horizontal directional drilling (HDD) in this location as an avoidance of impacts to native prairie.

The collector line between WTG 17 and WTG 18 would cross approximately 375 feet of the native prairie boundary identified by desktop delineation (i.e., the MBS Site of Moderate Biodiversity Significance lands polygon classified as moderate is wider than as observed on the aerial photograph) (**Figure 2**). This portion of the collector line will be bored and no surface disturbances within the desktop native prairie boundary will occur. This is the only MBS Site of Moderate Biodiversity Significance within the site boundary. The site boundary is defined as any temporary or permanent disturbances due to the construction and/or operation of the proposed project.

In response to DNR's comments, Palmer's Creek has committed to using HDD to eliminate impact to the DNR Prairie Native Plant Community. Please refer to letter dated July 31, 2017 from Stinson Leonard Street to Mr. D. Wolf, Minnesota Public Utilities Commission. Impacts to native prairie will be avoided during the installation of the collector line between WTG 17 and WTG 18 since HDD will be used.

Palmer's Creek believes the above narrative will be sufficient for a Native Prairie Protection Plan because of the small area within the site boundary that is classified as a MBS Site of Moderate Biodiversity Significance, and because HDD will be utilized.

If you have any questions or need additional information, please do not hesitate to contact me at (701) 751-6125 or [jaskim@wenck.com](mailto:jaskim@wenck.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Askim'.

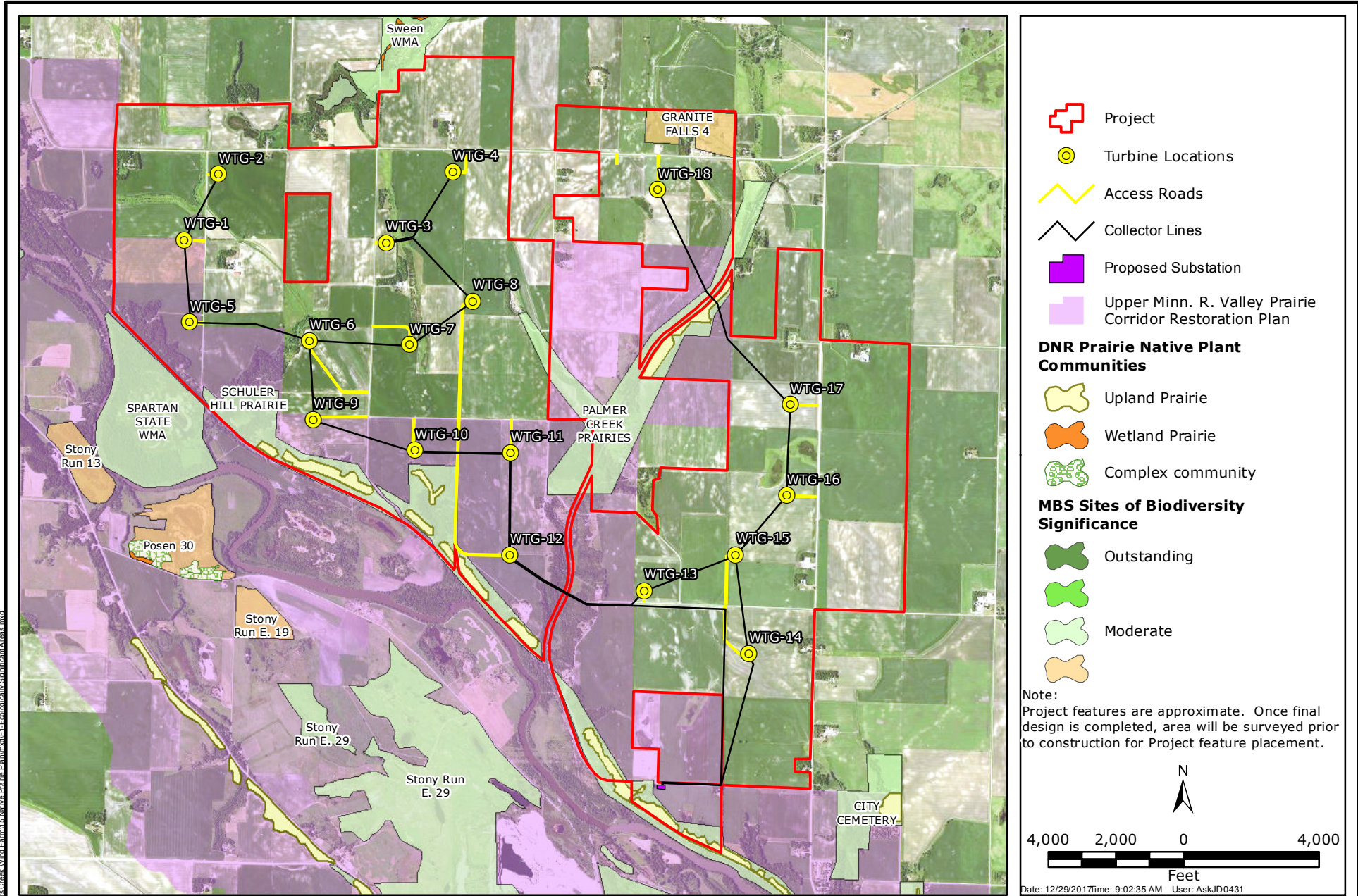
Justin Askim, Principal  
Wildlife Biologist/Natural Resources Specialist

A handwritten signature in black ink, appearing to read 'Daniel S. Ackerman'.

Daniel S. Ackerman, Associate  
Wildlife Biologist/Natural Resources Specialist

A handwritten signature in black ink, appearing to read 'Amy Denz'.

Amy Denz, Associate  
Environmental Review Specialist

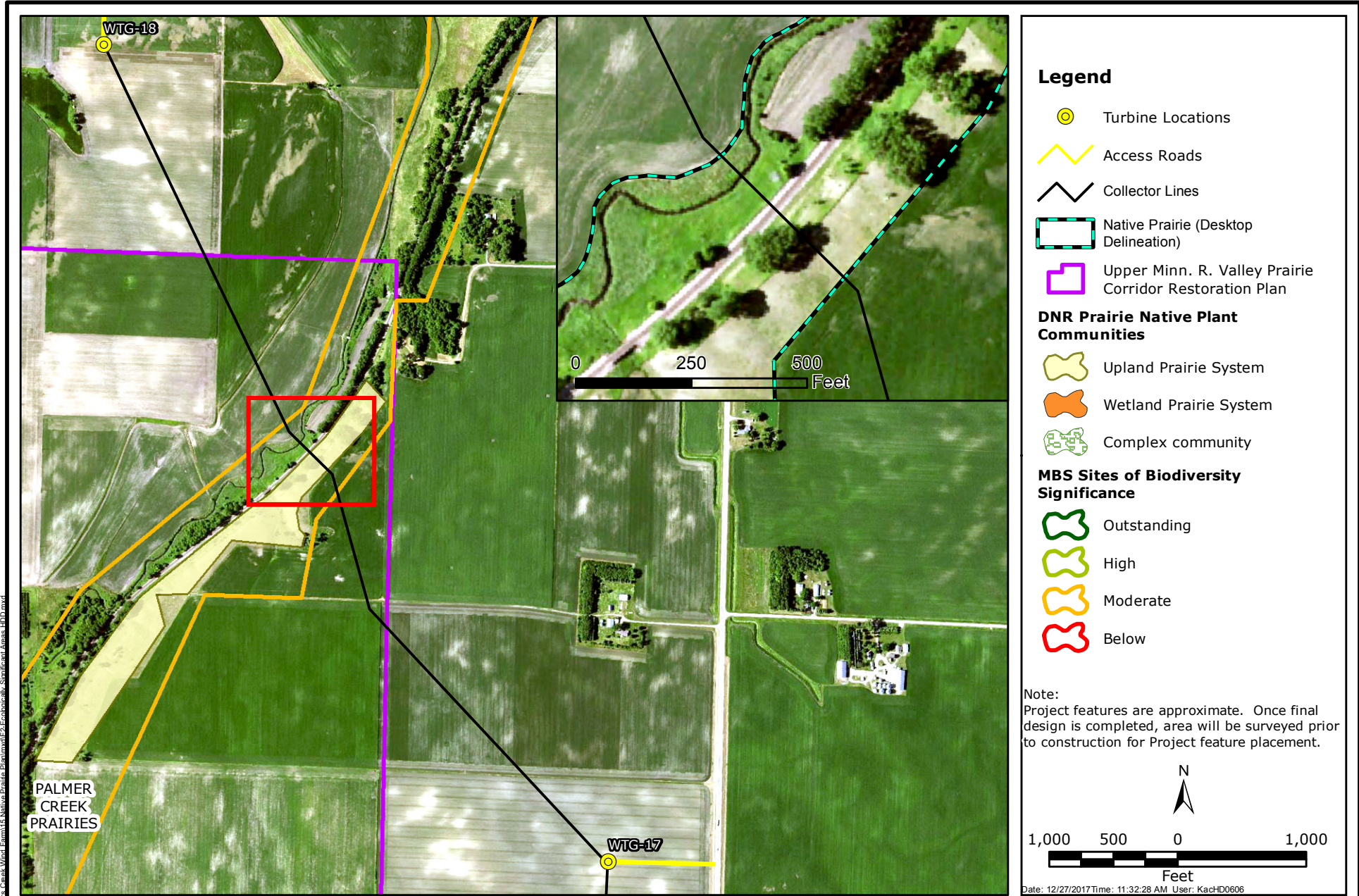


PALMER'S CREEK WIND FARM, LLC  
Ecologically Significant Areas



DEC 2017  
Figure 1

Path: \\GIS\GIS\2017\Palmer's Creek Wind Farm\1.4 Native Prairie Planning\1.4 Ecologically Significant Areas.mxd



Path: \\GIS\2017\6016\_Palmer's\_Creek\_Wind\_Farm\14\_NativePrairie\_Planning\ES2\_Ecologically\_Significant\_Areas\_HDD.mxd

PALMER'S CREEK WIND FARM, LLC

Ecologically Significant Areas



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Figure 2