# Appendix D Agency Correspondence

This appendix provides a summary of outreach efforts conducted by Xcel Energy. On February 1 and 2, 2022, Xcel Energy sent project notification letters to individuals representing federal, state, and local entities requesting comment on the proposed Pleasant Valley Wind Farm Repowering Project. The agencies contacted are included in the table below and a representative letter as well as agency responses as of April 29, 2022, follow the table.

Agency Correspondence for the Pleasant Valley Wind Farm Repower Project				
Agency	Response Date (Type)			
Federal	,			
U.S. Army Corps of Engineers, La Crescent Field Office	No response to date			
U.S. Fish and Wildlife Service – Twin Cities Ecological Services Field Office	No response to date			
National Telecommunications and Information Administration	March 14, 2022 (Response)			
State				
Minnesota Historical Society – State Historic Preservation Office	No response to date			
Minnesota Office of the State Archaeologist	March 16, 2022 (Response)			
Minnesota Department of Natural Resources (MNDNR) – Energy Projects Review	No response to date			
MNDNR – Region 4 (Southern Region)	March 1, 2022 (Response March 4, 2022 (Response) March 7, 2022 (Response and Early Coordination Letter)			
MNDNR – Natural Heritage Information System Review	No response to date			
Minnesota Department of Health	No response to date			
Minnesota Department of Agriculture	No response to date			
Minnesota Department of Transportation (MNDOT)– Routing and Siting Coordinator	February 2, 2022 (Response) February 24, 2022 (Response)			
MNDOT – District 6 Engineer	No response to date			
Minnesota Department of Employment & Economic Development	No response to date			
Minnesota Pollution Control Agency, Southeast Region, Rochester Office	No response to date			
Minnesota Department of Public Safety	No response to date			
County				
Mower County – Public Works	No response to date			
Mower County – District 2	No response to date			
Dodge County – District 3	No response to date			
Dodge County – District 4	No response to date			
Dodge County Highway Department	No response to date			

Agency Correspondence for the Pleasant Valley Wind Farm Repower Project			
Agency	Response Date (Type)		
Dodge County Environmental Services Department	No response to date		
<b>Local Government Units</b>			
Dexter Township – Chairman	No response to date		
Red Rock Township – Chairman	No response to date		
Sargeant Township – Chairman	No response to date		
Waltham Township – Chairman	No response to date		
Hayfield Township – Chair	No response to date		
Vernon Township – Chair	No response to date		
City of Sargeant - Mayor	February 7, 2022 (Response)		
City of Dexter - Mayor	No response to date		
City of Waltham - Mayor	No response to date		
Native American Tribes			
Tribal Historic Preservation Officer Lower Sioux Indian Community	No response to date		
Tribal Historic Preservation Officer Upper Sioux Community	No response to date		
Tribal Historic Preservation Officer/Director Prairie Island Indian Community	No response to date		
Shakopee Cultural Resource Director	No response to date		
Bois Forte Tribal Historic Preservation Officer	No response to date		
Fond du Lac Tribal Historic Preservation Officer	No response to date		
Grand Portage Tribal Historic Preservation Officer	No response to date		
Leech Lake Tribal Historic Preservation Officer	No response to date		
Mille Lacs Tribal Historic Preservation Officer	No response to date		
Red Lake Archaeologist	No response to date		
White Earth Tribal Historic Preservation Officer	No response to date		
MIAC Cultural Resources Specialist	No response to date		

**Representative Project Introduction Letter** 



January 17, 2022

# RE: Requesting Comments on the Pleasant Valley Wind Farm Repower Project in Mower and Dodge Counties, Minnesota

Dear Agency Staff,

Xcel Energy is writing to request comments regarding its plans to acquire an amended Site Permit from the Minnesota Public Utilities Commission ("MPUC") for the Pleasant Valley Wind Farm Repower Project ("Project") located in Mower and Dodge Counties, Minnesota (see attached Project Location Map). The original Site Permit for the 100-turbine, 200-megawatt large wind energy conversion system was issued by the MPUC on February 10, 2014. Xcel Energy anticipates applying for an amendment during the second quarter of 2022.

The Project would extend the life of the wind farm and include adding longer blades (rotors) and upgrading other components within 86 turbines and replacing the entire nacelle for 14 turbines. Repowering would change the turbine rating from 2.0 megawatts ("MW") to 2.2 MW for 86 turbines and 14 repowered turbines would remain at 2.0 MW. The purpose of the Project is to improve turbine technology and to maximize energy yield. Longer blades provide an increase in the rotor swept area, which results in a corresponding increase in the nominal production capacity of the Project. No new turbines would be added to the existing wind farm as part of the Project and the Project is expected to extend the life of the wind farm for 25 years.

The previously permitted locations of turbines, access roads, collection lines, and other supporting infrastructure will remain the same. A full-sized crane will be used to remove the old rotors and nacelles and install the new components. Some minor upgrading of public roadways and intersections may be required to allow for delivery of the replacement rotors and nacelles to each turbine location. A temporary staging/laydown yard will be constructed within agricultural lands to stage the turbine components prior to installation. Xcel Energy will widen existing turbine access roads to allow for use by heavy construction equipment, including cranes, for installing the new rotors and nacelles. The widened access roads will be restored to pre-construction conditions following the repower. Xcel Energy anticipates construction to begin in the third quarter of 2024.

Xcel Energy is conducting field studies to identify a suitable location for the staging/laydown area and the precise location of this facility is pending. Table 1 provides the public land sections that are included in the Project area.



Table 1 Pleasant Valley Wind Farm Repower Project Location						
<b>County Name</b>	Township Name	Township	Range	Sections		
Mower	Dexter	103N	16W	3 - 9, 14 - 30, and 33		
	Red Rock	103N	17W	1, 12		
	Sargeant	104N	16W	5 - 11, 14 - 22, and 27 - 34		
	Sargeant/City of Sargeant	104N	16W	18 and 19		
	Waltham	104N	17W	1 - 5, 10 - 15, 22 - 24, and 36		
Dodge	Hayfield	105N	17W	24, 25, and 32 - 36		
	Vernon	105N	16W	19, 20, and 29 - 32		

With this letter, Xcel Energy is requesting comments on any resources that should be considered in the Site Permit Amendment Application for the proposed Project. To facilitate your review, we have enclosed a map that depicts the proposed Project area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the Commission's review process.

If you require further information or have questions regarding this matter, please contact me at (612) 330-5835 or <a href="mailto:Thomas.Hillstrom@xcelenergy.com">Thomas.Hillstrom@xcelenergy.com</a>.

Sincerely,

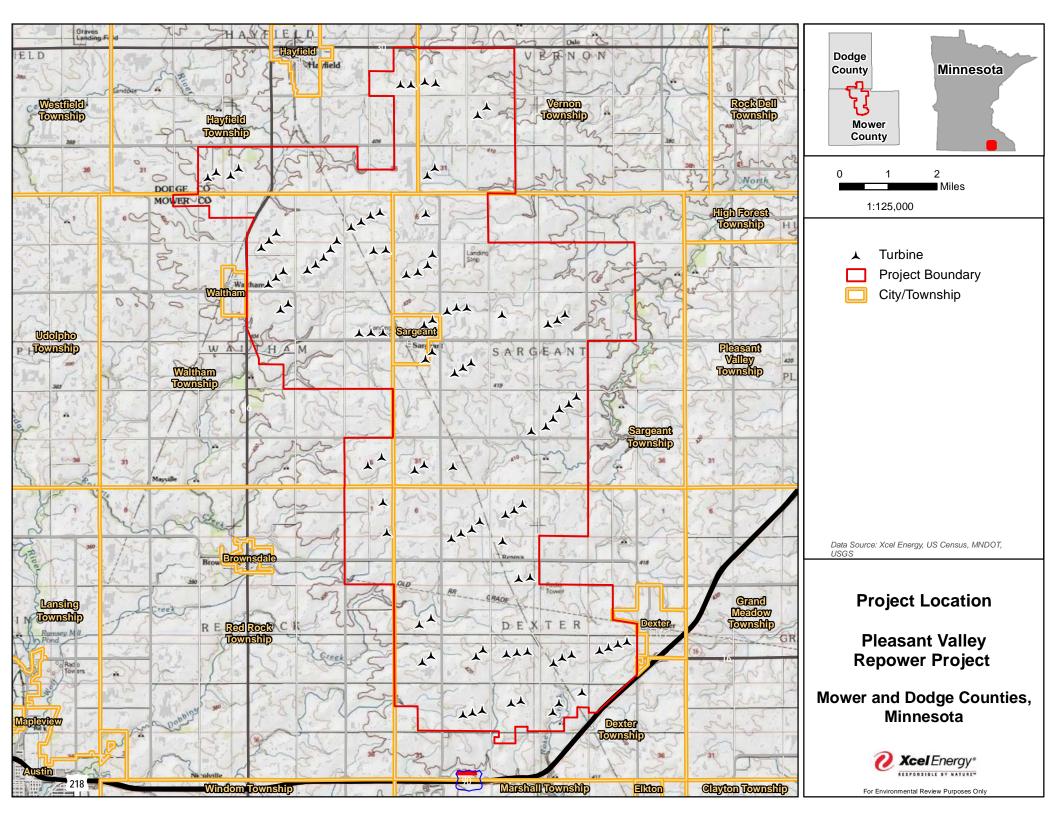
**Thomas Hillstrom** 

I Millet

Principal Permitting Agent, Siting and Land Rights

**Xcel Energy** 

Enc. Pleasant Valley Wind Farm Repower Project Area Map



**Agency Responses** 

March 14, 2022

Mr. Frank O'Brien COMSEARCH 19700 Janelia Farm Blvd. Ashburn, VA 20147

Re: Pleasant Valley Wind Farm Repower Project: Mower & Dodge Counties,

MN

Dear Mr. O'Brien:

In response to your request on January 21, 2022, the National Telecommunications and Information Administration provided to the federal agencies represented in the Interdepartment Radio Advisory Committee (IRAC) the plans for the Pleasant Valley Wind Farm Repower Project, located in Mower and Dodge Counties, Minnesota.

After a 45+ day period of evaluation, no *reviewing* agencies had issues with turbine placement in this area.

While the IRAC agencies did not identify any concerns regarding radio frequency blockage, this does not eliminate the need for the wind energy facilities to meet any other requirements specified by law related to these agencies. For example, this review by the IRAC does not eliminate any need that may exist to coordinate with the Federal Aviation Administration concerning flight obstruction.

Thank you for the opportunity to review these proposals.

Sincerely,

John R. McFall Deputy Chief, Spectrum Services Division Office of Spectrum Management From: <u>Hillstrom, Thomas G</u>
To: <u>Tworzyanski, Jennifer (ADM)</u>

Cc: Monika Davis

Subject: EXTERNAL: RE: OSA Comments for Pleasant Valley Wind Farm Repower Project

**Date:** Wednesday, March 16, 2022 3:10:40 PM

Attachments: <u>image001.png</u>

# **CAUTION:** This email originated from outside of Merjent.

Hi Jennifer,

Thanks for the comments, we have plenty of time to incorporate this into our permit application.

I'll forward this to our consultants with expertise in cultural resources but I think our project can avoid any disturbance to the archaeological site and visual impacts should be minimal since we are just retrofitting existing turbines (not building new ones).

Thank you,

### **Tom Hillstrom**

### Xcel Energy | Responsible By Nature

**Principal Permitting Agent** 

414 Nicollet Mall, 414-6A Minneapolis, MN 55401

P: 612 330 5835 C: 612 584 8783 E: <a href="mailto:thomas.hillstrom@xcelenergy.com">thomas.hillstrom@xcelenergy.com</a>

From: Tworzyanski, Jennifer (ADM) < Jennifer. Tworzyanski@state.mn.us>

Sent: Wednesday, March 16, 2022 3:05 PM

**To:** Hillstrom, Thomas G <Thomas.Hillstrom@xcelenergy.com>

Subject: OSA Comments for Pleasant Valley Wind Farm Repower Project

### **EXTERNAL - STOP & THINK** before opening links and attachments.

Thomas,

I apologize the Office of the State Archaeologist's comments for this project were delayed. Attached are our comments and recommendations. Please let me know if you have any questions or concerns.

Thanks,
-Jennifer

Jennifer Tworzyanski Assistant to the State Archaeologist Office of the State Archaeologist 328 West Kellogg Blvd St Paul, MN 55102



# 328 West Kellogg Blvd St Paul, MN 55102

OSA.Project.Reviews.adm@state.mn.us

**Date:** 03/16/2022

Tom Hillstrom Xcel Energy 612 330 5835 Thomas.Hillstrom@xcelenergy.com

Project Name: Pleasant Valley Wind Farm Repower Project

Known or Suspected Cemeteries	
☑ Platted Cemeteries - T103 R17 S12 E SW; T104 R16 S31 NE NE	
☑ Unplatted Cemeteries - T103 R16 S29 SE SW; T104 R17 S22 SW SW	
☐ Burial File	
Notes/Comments	

Thank you for giving the Office of the State Archaeologist the opportunity to provide comments for the Pleasant Valley Wind Farm Repower project. Review of our files indicates the proposed project boundary intersects intersects with archaeological site lead 21MWw (Sutton, ghost town). While there is a single archaeological site lead in the proposed project area, given the areas of moderate to high archaeological potential, as well as the presence of multiple unplatted cemeteries in the project area, a phase la literature review is recommended to determine the project's potential for impacting the unplatted cemeteries, as well as previously unrecorded archaeological and cemetery sites.

### Recommendations

Letter 1

□ Not Applicable	
□ No Concerns	
☐ Monitoring	
☑ Phase Ia – Literature Review	
☐ Phase I – Reconnaissance survey	
☐ Phase II — Evaluation	
☐ Phase III – Data Recovery	

If you require additional information or have questions, comments, or concerns please contact our office.

Sincerely,

Jennifer Tworzyanski

Assistant to the State Archaeologist

OSA

Kellogg Center 328 Kellogg Blvd W

St Paul MN 55102

651.201.2265

jennifer.tworzyanski@state.mn.us

Letter 2

From: Schindler, Kate D

To: <u>Angela Durand</u>; <u>Monika Davis</u>

Subject: EXTERNAL: FW: DNR early coordination comments on Pleasant Valley Wind Repower project

**Date:** Monday, March 7, 2022 3:01:22 PM

Attachments: image001.png

2022-03-07-PleasantValleyWindRepower DNREarlyCoordinationLetter.pdf

# **CAUTION:** This email originated from outside of Merjent.

From: Boettcher, Joanne (DNR) < Joanne. Boettcher@state.mn.us>

**Sent:** Monday, March 7, 2022 2:57 PM

**To:** Hillstrom, Thomas G <Thomas.Hillstrom@xcelenergy.com>; Schindler, Kate D <Kathleen.Schindler@xcelenergy.com>; Whiton, Shannon <Shannon.Whiton@xcelenergy.com>

Cc: Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Piepho, Todd (DNR) <todd.piepho@state.mn.us>; Beste, Brent (DNR) <br/>
craig.soupir@state.mn.us>; Vorland, Jeanine (DNR) <jeanine.vorland@state.mn.us>; Gelvin-Innvaer, Lisa A (DNR) lisa.gelvin-innvaer@state.mn.us>; Kolander, Todd D (DNR) <todd.kolander@state.mn.us>; Gieseke, Tim (DNR) <tim.gieseke@state.mn.us>; Woodley, Korey (DNR) <Korey.Woodley@state.mn.us>; Roemhildt, Scott (DNR) <scott.roemhildt@state.mn.us>; Marsh, Dawn S <dawn\_marsh@fws.gov>; Miltich, Louise (COMM) <louise.miltich@state.mn.us> Subject: DNR early coordination comments on Pleasant Valley Wind Repower project

# **EXTERNAL - STOP & THINK** before opening links and attachments.

Tom, Kate, and Shannon,

Please find the DNR early coordination comment letter attached.

Thank you for the responses you sent earlier today. I appreciate that excel is using roads for the crane paths. Let me know if you have any questions or follow-up.

Thanks,

Joanne Boettcher Regional Environmental Assessment Ecologist MNDNR – Mankato (507) 389-8813



**From:** Schindler, Kate D < <a href="mailto:Kathleen.Schindler@xcelenergy.com">Kathleen.Schindler@xcelenergy.com</a>>

**Sent:** Monday, March 7, 2022 9:09 AM

**To:** Boettcher, Joanne (DNR) < <u>Joanne.Boettcher@state.mn.us</u>>

**Cc:** Hillstrom, Thomas G < Thomas. Hillstrom@xcelenergy.com>; Whiton, Shannon

<<u>Shannon.Whiton@xcelenergy.com</u>>; Warzecha, Cynthia (DNR) <<u>cynthia.warzecha@state.mn.us</u>> **Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

Hi Joanne,

Please see below in red for our responses to your questions about the Pleasant Valley Wind Farm repower project. Please let us know if you need any additional information for your review.

Thank you,

Kate

### **Kate Schindler**

### **Xcel Energy**

**Environmental Analyst** 

414 Nicollet Mall, 2<sup>nd</sup> Floor, Minneapolis, MN 55401

**P:** 612.330.6743 **C:** 715.864.6864 **E:** <u>kathleen.schindler@xcelenergy.com</u>

<u>Call me in Teams</u> <u>Message me in Teams</u>

XCELENERGY.COM

Please consider the environment before printing this email.

**From:** Boettcher, Joanne (DNR) < <u>Joanne.Boettcher@state.mn.us</u>>

**Sent:** Friday, March 4, 2022 11:12 AM

To: Hodkiewicz, Laurel < Laurel. Hodkiewicz@xcelenergy.com >; Hillstrom, Thomas G

<Thomas.Hillstrom@xcelenergy.com>

**Cc:** Warzecha, Cynthia (DNR) < <u>cynthia.warzecha@state.mn.us</u>>

Subject: RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

### **EXTERNAL - STOP & THINK** before opening links and attachments.

Hi, Looking at this project today. Can you clarify a couple things:

- The collection lines are in place and do not represent new disturbance, correct? Yes, that is correct.
- The shapefile does not contain a specific item identified as crane paths. I do see access roads and note that the letter mentions that existing access roads will be widened. Do the provided shapefiles show all cranepaths or is some of this being developed? Is there anything else I need to understand about those? Crane movements will follow public and private roads and existing turbine access roads. Turbine access roads may need to be widened, and we are still working to determine how much widening will be necessary. We have identified two areas of native prairie adjacent to planned access at Turbine 4 and Turbine 70. We intend to modify our access to avoid any impacts to these native prairie areas. In addition, we will conduct a survey to identify native prairie within the project area and develop a Native Prairie Protection Plan in coordination with DNR prior to the start of construction.

Are there any other on-the-ground impacted areas not currently identified within the

provided shapefile? Yes, there will be a crane assembly area of roughly 300 by 60 feet adjacent to turbine access roads. Around each turbine, there will be a 400-foot radius temporary workspace and a 250-foot radius crane working pad. A portion or all of the crane assembly area and crane working pad will be constructed of compacted soil with a gravel surface. These work areas will be temporary and will be sited to avoid impacts to natural areas such as wetlands, grassland, native prairie and streams.

• Did the project originally review wetlands for potential calcareous fen presence? If so, can you send me that report? The original wetland study for the wind farm did not include a review for potential calcareous fens. We reviewed the MN Natural Resource Atlas site for fens and did not identify any recorded fens within the project area.

Thanks,

Joanne

**From:** Hodkiewicz, Laurel < <u>Laurel.Hodkiewicz@xcelenergy.com</u>>

Sent: Wednesday, February 2, 2022 12:36 PM

**To:** Boettcher, Joanne (DNR) < <u>Joanne.Boettcher@state.mn.us</u>> **Cc:** Hillstrom, Thomas G < <u>Thomas.Hillstrom@xcelenergy.com</u>>

**Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

Joanne,

The Pleasant Valley GIS data has been made available in the link below. If you have any questions or need other data, please let me know.

One or more files have been made available for you to download. In order to download the file(s), please use the link(s) below. The link(s) will expire at 2022-02-07 12:35:18 PM CST and may be used for no more than 5 times.

PV\_Data\_to\_MDNR.zip:

https://xpressdrive.xcelenergy.com/portalseefx/~public/MTVmMjQ5NGUtMmZhYi00MWI2LTk1ZTYtNWVjOGU1Y2Q4 OWM1?download

Thanks,

# **Laurel Hanson Hodkiewicz**

**Xcel Energy** 

Senior Geospatial Analyst - Siting & Land Rights 1414 W. Hamilton Ave., Eau Claire, WI 54701 P: 715.737.1308 C: 715.456.1819

## E: <u>Laurel.Hodkiewicz@xcelenergy.com</u>

### **XCELENERGY.COM**

Please consider the environment before printing this email.

**From:** Hillstrom, Thomas G < Thomas. Hillstrom@xcelenergy.com>

Sent: Tuesday, February 1, 2022 12:36 PM

**To:** Hodkiewicz, Laurel < <u>Laurel.Hodkiewicz@xcelenergy.com</u>>

**Subject:** FW: Xcel Proposed Repower of the Pleasant Valley Wind Facility

Laurel,

Could you send the Pleasant Valley Re-Power shapefile to Joanne? (project boundary, access routes, crane pads turn radius, etc)

Thanks much

### **Tom Hillstrom**

## Xcel Energy | Responsible By Nature

**Principal Permitting Agent** 

414 Nicollet Mall, 414-6A Minneapolis, MN 55401

P: 612 330 5835 C: 612 584 8783 E: <a href="mailto:thomas.hillstrom@xcelenergy.com">thomas.hillstrom@xcelenergy.com</a>

**From:** Boettcher, Joanne (DNR) < <u>Joanne.Boettcher@state.mn.us</u>>

Sent: Tuesday, February 1, 2022 12:27 PM

**To:** Hillstrom, Thomas G < Thomas.Hillstrom@xcelenergy.com>

**Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

# **EXTERNAL - STOP & THINK** before opening links and attachments.

Hi Tom, Thanks! I only see the project map. Is this a full or partial repower? Can you send in a shapefile of the project footprint and disturbed/infrastructure areas? Thanks, Joanne

**From:** Hillstrom, Thomas G < Thomas.Hillstrom@xcelenergy.com>

Sent: Tuesday, February 1, 2022 12:18 PM

To: Boettcher, Joanne (DNR) < <u>Joanne.Boettcher@state.mn.us</u>>

Cc: Warzecha, Cynthia (DNR) < <u>cynthia.warzecha@state.mn.us</u>>

Subject: Xcel Proposed Repower of the Pleasant Valley Wind Facility

### This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Joanne,

Xcel plans to file a MN PUC permit application to re-power the Pleasant Valley Wind Farm in Dodge and Mower counties. The attached letter provides some background information and requests comments on the proposal.

Thanks for any input you can provide. We will include any feedback you provide in our permit application. We'll likely submit the application in April.

We will also send a specific NHIS letter to Samantha Bump and have copied Cynthia Warzecha on this correspondence.

### **Tom Hillstrom**

# Xcel Energy | Responsible By Nature

**Principal Permitting Agent** 414 Nicollet Mall, 414-6A Minneapolis, MN 55401

P: 612 330 5835 C: 612 584 8783 E: <a href="mailto:thomas.hillstrom@xcelenergy.com">thomas.hillstrom@xcelenergy.com</a>



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

March 7, 2022

Thomas Hillstrom

Excel Energy

Thomas.Hillstrom@xcelenergy.com

Subject: DNR Early Coordination Comments for Pleasant Valley Wind Repower

Dear Thomas,

This letter includes Minnesota Department of Natural Resource's early coordination review comments of the proposed Pleasant Valley Wind Repower project in response to a 2/1/22 review request and shapefile project information received 2/2/22 (footprint, turbines, access roads). As we understand, the proposed project, located in Mower and Dodge Counties (map attached for reference), is to retrofit 86 turbines to increase energy yield and extend the life of the project. The originally permitted towers, access roads, and collection lines will be used, but road widening and other temporary impacts including crane paths and a staging/laydown yard will occur. No new turbines will be added. Please submit updated shapefiles when all impacted areas are identified. Please note that we may request/confirm that we have the most updated shapefiles at formal review points.

### **General Guidance and Resources**

The project should review and integrate the <u>DNR Guidance for Commercial Wind Energy Projects</u>. Several natural resource GIS data layers are available on the <u>Minnesota Geospatial Commons</u> 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 <u>The Nature Conservancy's Site Wind Right</u>. Since most of the project components are already in place, avoidance strategies apply to the temporary impacts associated with the project.

# Bat, Bird, and Wildlife Protection

The project proposer will need to prepare an Avian and Bat Protection Plan (ABPP a.k.a. Bird and Bat Conservation Strategy) to identify and document measures to avoid and minimize risks to animals. 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 DNR supports this site permit requirement.

As a general precaution to small animals (birds, reptiles, small mammals, etc.), please use wildlife friendly erosion control products (see attachment) where erosion control is necessary. Specifically, do not use erosion control logs, blankets, or other products that contain plastic mesh. Plastic mesh tangles and kills small animals and persists in the environment for decades. We also generally encourage projects to minimize impacts to wildlife by avoiding habitat removal during the nesting and rearing season (generally spring through late summer) and checking for and deterring/removing wildlife from direct impacts from project activities (grading, machinery tracks, trench backfilling, etc.).

# Rare Features and Listed Species (NHIS Review)

The DNR 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. I did a preliminary review of the NHIS database (where data on these rare and listed features is kept), and I am not flagging any serious issues. The NHIS review results that you applied for will provide you the formal results.

### Waters, Wetlands, and Calcareous Fens

The project appears to be sited to largely avoid public waters, NWI wetlands, and sensitive groundwater areas. If a public water crossing were necessary, a <a href="DNR Utility Crossing License">DNR Utility Crossing License</a> is required. If dewatering or water appropriations are necessary, a <a href="Water Appropriation Permit">Water Appropriation Permit</a> may be necessary. Wetland delineations and avoidance should be done in accordance with Wetland Conservation Act (WCA) rules; the LGU is typically the WCA authority.

Calcareous fens, a rare and legally protected wetland type, are defined in the <u>DNR Calcareous Fen Technical</u> <u>Criteria</u>. Per MN Statute 103G.223G and MN Rule 8420.0935 Subp.4, calcareous fens must not be impacted, altered, or degraded except as provided for in a Calcareous Fen Management Plan (CFMP) approved by the DNR. Impacts include any temporary or permanent disturbance from any project related activities including construction, transport, infrastructure, or changes to hydrology or water quality. No calcareous fens have been documented within the project boundary, but one has been documented about 2 miles northeast. The project area could contain an undocumented calcareous fen. We ask that projects review the impacted areas including a 500 foot buffer around these areas to verify that there are no calcareous fens. If a potential calcareous fen is identified, the project is responsible to report this to the DNR as soon as possible, and additional coordination will be necessary.

### **Native Prairies**

A minimal amount of native prairie is within the project boundary, and it appears that the project will not be impacting the prairie. If this assessment is incorrect or if plans change and any prairie may be impacted, please let us know so we can look at this issue in more detail. We encourage projects to avoid any impacts to native prairie due to its extreme rarity and critical ecological niche for so many rare species in this area.

PUC's site permits require permittees to prepare a Prairie Protection and Management Plan (PPMP) in consultation with the DNR if native prairie, as defined in Minn. Stat. § 84.02, subd. 5, is identified within the site boundaries. The plan needs to describe the process by which native prairie was identified (e.g., historical imagery, GIS data layers, field verification) and the measures taken to avoid impacts to native prairie. The project may be able to update any existing PPMP as needed if any impacts to prairie may occur.

# **Invasive Species**

<u>Wild parsnip</u> has been identified within the project boundary. This plant can cause human injury and precautions should be taken. Please use invasive species prevention best practices (see attachment) to minimize risks to aquatic and terrestrial habitats.

# **Land Ownership Considerations**

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). Wild Indigo SNA is within the project boundary, but the project does not appear to impact this area. Three state-funded snowmobile trails bisect the project boundary. The project does not appear to impact the trails as currently mapped. Note that 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. As such, communication with these groups may be prudent:

- DN Snow Seekers, Mitch Hallaway (507) 458-5165
- Mower County Management Trails, Al Mullenbach (507) 437-4286
- Heartland Sno-goers, Jay Soltau (507) 438-0986

### **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,

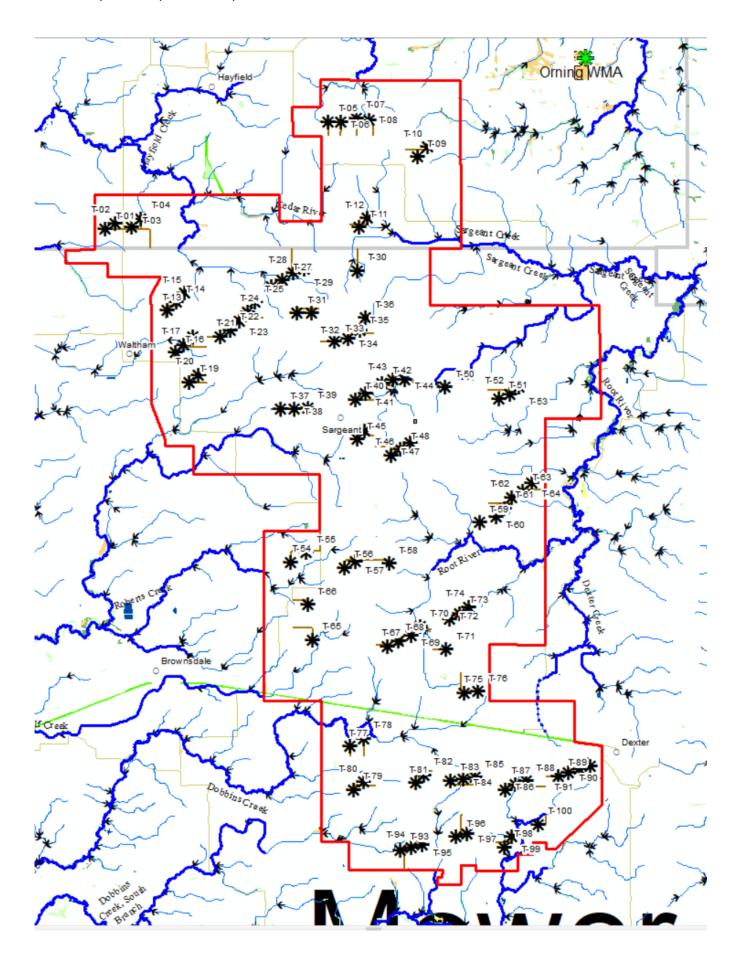
Joanne Boettcher

Joanne Boettcher

Regional Environmental Assessment Ecologist

cc:

Cynthia Warzecha, Energy Project Planner
Todd Piepho & Brent Beste, DNR Hydrologists
Craig Soupir, Jeanine Vorland, Lisa Gelvin-Innvaer, DNR Fish and Wildlife
Joel Wagar, DNR Parks and Trails; Megan Benage, Regional Ecologist
Todd Kolander, EWR South District Supervisor
Tim Gieseke, Korey Woodley, Scott Roemhildt, Regional Management
Dawn Marsh, USFWS
Louise Miltich, MNDOC



 From:
 Kotch Egstad, Stacy (DOT)

 To:
 Hillstrom, Thomas G

 Cc:
 Seely, Trevor R; Monika Davis

Subject: EXTERNAL: RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

**Date:** Thursday, February 24, 2022 12:41:36 PM

Attachments: <u>image001.png</u>

D6STIP.pdf

# **CAUTION:** This email originated from outside of Merjent.

Good Afternoon Mr. Hillstrom,

MnDOT has reviewed the preliminary information provided in your email for the Repower of the Pleasant Valley Wind Facility and offers the following comments for consideration:

- 1. MnDOT recommends that existing project access points remain the same
- 2. If utilizing any other type of existing accesses from state trunk highways, MnDOT permits will need to be applied for as this is a change of use, even if temporary, from the existing access
- 3. MnDOT encourages you to stay aware of our future projects so you can plan accordingly for delivery of the equipment to the project site attached is a PDF of MnDOT's District 6 STIP Construction Plans and also found <a href="https://example.com/here">here</a>
- 4. Permit applications and instructions are located here: MnDOT Utility Permits and MnDOT Oversize/Overweight Permits, keeping in mind that you may need more than one type of permit from MnDOT
- 5. Please note the PUC Docket number on all permits applied for so that district staff may cross reference the issuing of the PUC permit

Early permit coordination is recommended and should be done through Jon Keranen, MnDOT District 6A Engineering Specialist at <u>Jonathan.Keranen@state.mn.us</u> or 507-456-5347.

Thank you for the opportunity to provide early feedback on this proposed repower project. Please contact me with any questions.

# Stacy Kotch Egstad

Utility Routing and Siting Coordinator Minnesota Department of Transportation Office of Land Management stacv.kotch@state.mn.us

MnDOT



**From:** Hillstrom, Thomas G <Thomas.Hillstrom@xcelenergy.com>

Sent: Monday, February 7, 2022 12:56 PM

To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>

**Cc:** Seely, Trevor R < Trevor.R. Seely@xcelenergy.com>; Monika Hagebak Davis

<monika.davis@merjent.com>

**Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

Hi Stacy,

Thanks for the response, I'll do my best to give you some answers here. We are still in the planning phase so our answers to these questions will be refined over the coming months.

- 1. For the 6 permits for temporary work (delivery of turbines):
  - a. Will you utilize the same access for delivery of new components? We are not yet sure but it is likely that previous access routes will be utilized.
  - b. If not, do you have any idea at this time where those access points may be? It may be some time before we are certain about this because construction is not planned to start until late 2024.

(I know the letter states you will use existing but wanted to make sure)

- 2. For the 1 permit for the 34.5kV crossing of TH 56 is under Xcel Energy C/O Pleasant Valley Wind, LLC so:
  - a. I do not believe that a new permit needs to be applied for to accommodate ownership change since Xcel is already listed but,
  - b. Should you replace/upgrade the collection line, a new permit would be needed regardless which I'm sure you already know.

We agree that the existing permit will probably be sufficient because we do not plan to upgrade the collection system.

We appreciate your involvement and we'll plan to keep you informed as construction details become more clear.

### **Tom Hillstrom**

# **Xcel Energy**

Principal Permitting Agent
414 Nicollet Mall. 414-6A Minneapolis. MN 55401

P: 612 330 5835 C: 612 584 8783 E: thomas.hillstrom@xcelenergy.com

**From:** Kotch Egstad, Stacy (DOT) < <a href="mailto:stacy.kotch@state.mn.us">stacy.kotch@state.mn.us</a>>

Sent: Wednesday, February 2, 2022 1:43 PM

**To:** Hillstrom, Thomas G < <a href="mailto:Thomas.Hillstrom@xcelenergy.com">Thomas G < <a href="mailto:Thomas.Hillstrom@xcelenergy.com">Thomas.Hillstrom@xcelenergy.com</a>>

**Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

**EXTERNAL - STOP & THINK** before opening links and attachments.

Good Afternoon Tom.

Thank you for the email.

I have asked MnDOT's District 6 staff to send me their comments on the project so that you'll have a combined document to add to the permit application when the time comes.

After doing some research on what existing permits we have for the original project, I have a couple of questions/comments.

- 1. For the 6 permits for temporary work (delivery of turbines):
  - a. Will you utilize the same access for delivery of new components?
  - b. If not, do you have any idea at this time where those access points may be?

(I know the letter states you will use existing but wanted to make sure)

- 2. For the 1 permit for the 34.5kV crossing of TH 56 is under Xcel Energy C/O Pleasant Valley Wind, LLC so:
  - a. I do not believe that a new permit needs to be applied for to accommodate ownership change since Xcel is already listed but,
  - b. Should you replace/upgrade the collection line, a new permit would be needed regardless – which I'm sure you already know.

Thank you for any answers you can provide.

I'll send a more formal response when I hear back from the District.

# Stacy Kotch Egstad

Utility Routing and Siting Coordinator Minnesota Department of Transportation Office of Land Management

stacy.kotch@state.mn.us

MnDOT

**From:** Hillstrom, Thomas G < Thomas.Hillstrom@xcelenergy.com>

Sent: Tuesday, February 1, 2022 12:29 PM

**To:** Kotch Egstad, Stacy (DOT) < <a href="mailto:stacy.kotch@state.mn.us">stacy.kotch@state.mn.us</a>>

**Subject:** RE: Xcel Proposed Repower of the Pleasant Valley Wind Facility

# This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Stacy,

My previous e-mail only included the map. The whole letter is attached here.

### **Tom Hillstrom**

### **Xcel Energy | Responsible By Nature**

Principal Permitting Agent

414 Nicollet Mall, 414-6A Minneapolis, MN 55401

P: 612 330 5835 C: 612 584 8783 E: <a href="mailto:thomas.hillstrom@xcelenergy.com">thomas.hillstrom@xcelenergy.com</a>

From: Hillstrom, Thomas G

Sent: Tuesday, February 1, 2022 12:22 PM

To: stacy.kotch@state.mn.us

Subject: Xcel Proposed Repower of the Pleasant Valley Wind Facility

Stacy,

Xcel plans to file a MN PUC permit application to re-power the Pleasant Valley Wind Farm in Dodge and Mower counties. The attached letter provides some background information and requests comments on the proposal.

Thanks for any input you can provide. We will include any feedback you provide in our permit application. We'll likely submit the application in April.

# **Tom Hillstrom**

# Xcel Energy | Responsible By Nature

**Principal Permitting Agent** 

414 Nicollet Mall, 414-6A Minneapolis, MN 55401

P: 612 330 5835 C: 612 584 8783 E: <a href="mailto:thomas.hillstrom@xcelenergy.com">thomas.hillstrom@xcelenergy.com</a>

Record of Telephone Call

Project: Pleasant Valley Repower

Date: February 7, 2022

Caller: Roger Nelson, Mayor of Sargent MN

j.rnelson@yahoo.com

507 421 3788 200 East Main Sargent, MN 55973

### Discussion:

Roger found our recent mailing at the City Facility. Our mailing list needs to be updated to reflect that Roger is the current Mayor. He asked that we use the address above.

Roger has heard his neighbors complaining about shadow flicker and noise. He believes that people will be involved in this upcoming process to express their concerns.

There are three turbines located within city limits of Sargent. Roger expressed concerns of future development being placed near these turbines and being exposed to noise and flicker. He indicated that many people are being drawn to opportunities in Rochester and may increase development in communities like Sargent.