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April 30, 2021

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

In the Matter of the Application of Big Bend Wind, LLC for a Certificate of Need, Site Permit, and Route Permit for an up to 308 MW Wind Farm and Associated 161 kV Transmission Line in Cottonwood, Martin, and Watonwan Counties, Minnesota

PUC Docket Numbers: IP7013/CN-19-408, IP7013/WS-19-619, IP7013/TL-19-621

In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need and Site Permit for an up to 60 MW Solar Facility in Cottonwood County, Minnesota

PUC Docket Numbers: IP7014/CN-19-486, IP7014/GS-19-620

Dear Mr. Davis,

On March 17th 2021, the Minnesota Public Utilities Commission (PUC) issued a Notice of Public Information and Environmental Review Scoping Meeting on the Certificate of Need, Site Permit and Route Permit Applications for the Big Bend Wind, LLC and Red Rock Solar, LLC (Applicants) for their proposed 308 megawatt (MW) wind generation project, 161kV Transmission Line and 60 MW Solar Facility, respectively, in Cottonwood, Martin and Watonwan Counties. The Minnesota Department of Transportation (MnDOT) has reviewed the applications regarding the proposed project and submits the following comments in response to the Notice.

Based on the information provided in the Site Permit Application, it appears that the project area sits predominately between State Trunk Highways (TH) 60 to the south and TH 30 to the north. MnDOT requests that the DOC EERA and the PUC consider the following comments and recommendations for site permit conditions as they apply to these affected areas of the State of Minnesota Trunk Highway System:

HVTL Specific Comments

The proposed 161kV HVTL routes shows a single, perpendicular crossing of TH 60 at Cottonwood CSAH 8. TH 60 right of way width expands or “kicks out” to span approximately 615 feet at County Road 8. Because no pole placement would be allowed at site corners or within the median, and there may be drainage concerns in this area, the Applicants will need to work closely with MnDOT to ensure

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safe and permissible pole placement. Given that the spans between poles can reach anywhere from 600 to 1100 feet, depending on pole type, the Applicant should consider the needed precautions of this affected area when planning their alignment, which may require longer spans between poles. For reference, a visual of this affected area is attached.

LWES Specific Comments

At this time, the current project location map shows that no wind turbines or collection lines pose an immediate concern for MnDOT. Additionally, and according to Figure 3c, the Applicants will not be requesting access roads from THs 60 or 30 for construction or continued use on this project. MnDOT strongly supports the 1.1 x total turbine height setback from Public Roads and Trails (as shown in Table 5.1-1) being applied to Big Bend Wind Project. Shadow Flicker analysis shows that T55 will have up to 10 hours annually affecting TH 60. While overall trunk highway shadow flicker effects for a project this size are quite minimal, this affected portion of TH 60 is the unfortunate host to numerous crash problems. Because shadow flicker exposure has the potential to distract high-speed traffic, shadow flicker effects on Minnesota's traveling public will remain a concern for MnDOT.

Solar Facility Specific Comments

Because the proposed Red Rock Solar Facility sits amid the Big Bend Wind Project and does not directly abut a state trunk highway, MnDOT has no concerns at this time. The Applicants may need to acquire oversize/overweight hauling permits as explained below.

As noted in the Site and Route Permit Applications, the Applicants may need to acquire several types of permits from MnDOT including utility accommodation on trunk highway right of way, oversize/overweight hauling and other highway access permitting ([MnDOT Permit Forms](#)). Additionally, all applicable MnDOT utility permit applications are subject to review by our Office of Environmental Stewardship as a standard part of our permit review process. These reviews may result in additional construction criteria and/or a request to move portions of a planned project outside of any given area of concern.

Because MnDOT's highway construction activities could impact the Applicants' plans to haul oversize loads to the proposed site, the Applicants will need to coordinate with MnDOT when planning such loads. MnDOT District 7 has several projects planned for the 2022 construction season:

- 2 to 4-lane expansion of US 14 between Nicollet and New Ulm
- construction of an RCUT on US 14 in Eagle Lake between CSAH 86 and CSAH 17
- resurfacing of I-90 eastbound lanes from TH4 near Sherburn and TH15 near Fairmont
- pavement replacement and bridge rehabilitations on the eastbound and westbound lanes of TH 60/TH 15 between Madelia and the south junction of TH60

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- resurfacing of US 169 between Winnebago and Vernon Center and between Elmore and Blue Earth
- bridge replacements on US 169 near St. Peter
- a concrete overlay on both eastbound and westbound I-90 between the South Dakota/MN state line and Beaver Creek

These projects can change and therefore, the applicant should regularly check the MnDOT website at <https://www.dot.state.mn.us/roadwork/index.html#gsc.tab=0> to remain up to date of the latest project information.

Should the PUC issue a Site Permit and Route Permit for the Big Bend Wind, LLC and Red Rock Solar, LLC, early coordination with MnDOT staff is strongly encouraged. Any MnDOT permits applied for as a part of these projects will not be issued until the PUC has issued an approved site permit for this project. All applicable permitting, traffic control and construction coordination efforts should be made through Marc Fischer, Engineering Specialist in the District 7B Permits Office at 507-822-2191 or Marc.Fischer@state.mn.us. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT owned property.

MnDOT has a continuing interest in working with the PUC, the DOC EERA and the Applicants to ensure that possible impacts to the entire state trunk highway system, traveling public and environmentally significant areas of concern are adequately addressed.

Thank you for the opportunity to provide these comments.

Sincerely,

Stacy Kotch Egstad

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

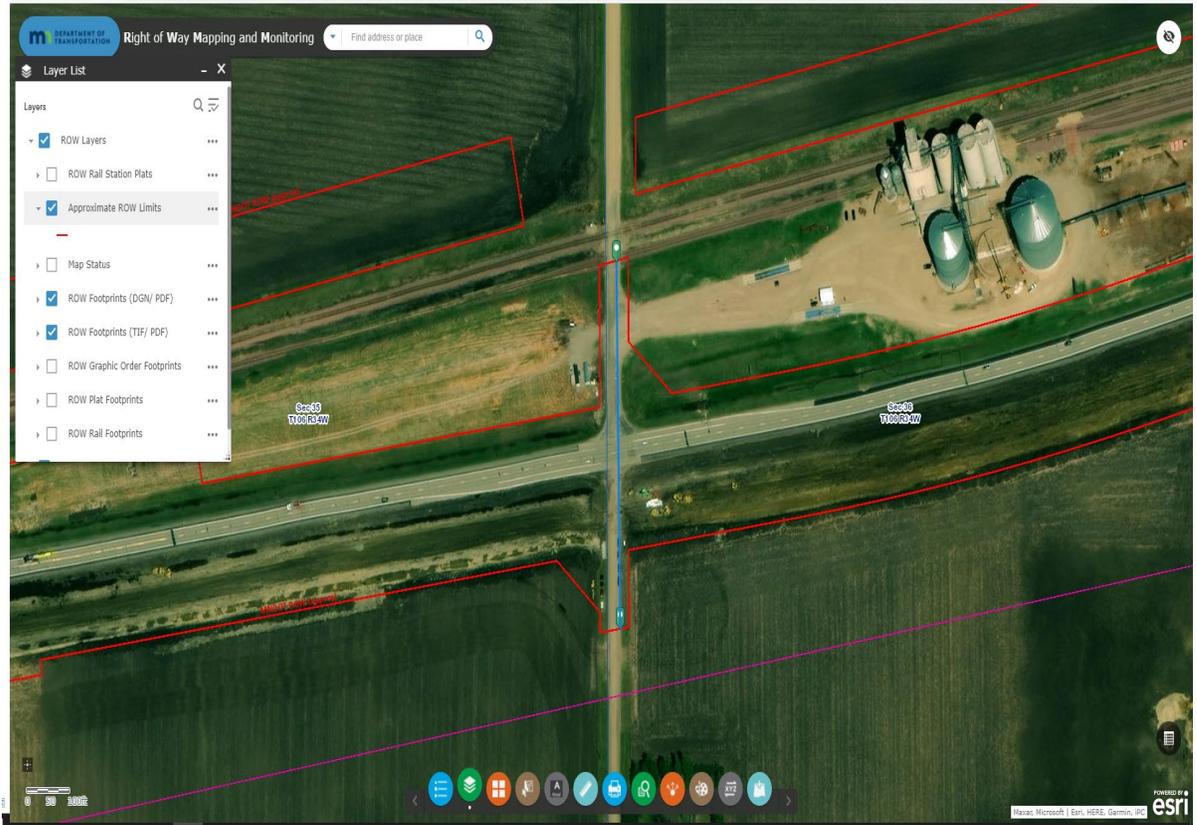
cc: Marc Fischer– MnDOT District 7 Permits

Angela Piltaver – MnDOT District 7 Senior Planner

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MnDOT Right of Way TH 60/Co Rd 8



Approximate MnDOT ROW Limits

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