



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

August 2, 2021

David Birkholz
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

**RE: In the Matter of the Application of Xcel Energy for an Amendment to the
Site Permit for the Grand Meadow Wind Farm Repower Project in Mower County
PUC Docket Number: IP6646/WS-07-839**

Dear Mr. Birkholz,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit amendment application for the Grand Meadow Wind Farm Repower Project in Mower County. Our agency offers the following comments:

The Mower County Management Snowmobile Trail is funded through a grant-in-aid (GIA) cost-sharing program administered by DNR Parks and Trails. The site permit amendment application states that crane paths will cross this snowmobile trail during construction, resulting in temporary impacts. Our agency advises that the best way to avoid impacts to snowmobile trails is to avoid construction activity from December 1 through April 1. If this timeframe is not feasible, the applicant will need to coordinate with the appropriate trail contact(s) early on to allow time to accommodate any trail route changes.

Snowmobile clubs finalize trail routes by mid-summer and the routes are not normally changed. Trail users incorporate the route maps as applications on their phones and any late-determined route changes can cause safety issues. The DNR recommends that the applicant contact Phil Nasby, DNR Parks and Trails Area Supervisor, to coordinate any route changes. It is important to note that GIA 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).

The site permit amendment application also acknowledges that Turbine 157 is within 165 feet of the Mower County Management Snowmobile Trail. This distance is less than the 250-foot setback established by the Public Utilities Commission (Commission). Although snowmobilers have safely used this trail during the operation of the existing Grand Meadow Wind Farm, our agency cautions that there is a potential for snowmobiler injury due to ice throw.

The DNR appreciates the opportunity to comment on the Grand Meadow Repower Project. Our agency advises that any DNR permits or licenses required for the project will not be granted until the Commission has issued an approved permit for this project. If you have questions about our agency's comments, I may be reached at 651-259-5078 or cynthia.warzecha@state.mn.us.

Sincerely,

/S/ Cynthia Warzecha
Energy Projects Planner

CC: Matt Langan, Xcel Energy
Michael Kaluzniak, Minnesota Public Utilities Commission
Joanne Boettcher, Minnesota Department of Natural Resources
ERDB 20210299