

# Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40\_\_



September 29, 2014

Burl Haar, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

Re: Permit Modifications for the Black Oak Wind and Getty Wind Site Permit  
PUC Docket Numbers: IP-6853/WS-10-1240 (Black Oak Wind)  
IP-6866/WS-11-831 (Getty Wind)

Dear Dr. Haar:

The Minnesota Department of Natural Resources (DNR) has reviewed the updated Vestas 110 Layout Maps for the Getty and Black Oak Wind Projects in Stearns County, Minnesota. Changes in turbine layout were compared to permitted layouts. The DNR estimated risk of avian and bat collision for these projects has been closely related to turbine layout and has previously changed as turbine layouts changed. The following comments are provided regarding the current layout, including an update to the estimated risk of avian and bat collision.

The DNR considered the proposed updated layout, previous layouts, flight path analyses, species identification, proximity of turbines to conservation lands, acoustic bat data, and use of previously disturbed land uses and continues to rank the estimated risk of bird and bat collision as Moderate for both the Black Oak and Getty Wind Projects. We would recommend following the Moderate risk survey protocols for fatality surveys included in the survey protocol guidance at the following webpage: <http://files.dnr.state.mn.us/eco/ereview/avian-bat-protocols.pdf>

There are, however, turbines we would recommend considering as alternative locations due to proximity to avian and bat habitat and possible increase in collision risk. Or, if there are other alternative locations identified, consider using those instead of these locations. In other words, we would recommend these as "second choices" in comparison to other turbine locations:

For the Getty Wind Project, Turbine 37 on the attached map: This turbine is in closer proximity to documented flight paths between a Waterfowl Production Area and a public water and should be considered an alternative location.

For the Black Oak Wind Project, Turbine 40 on the attached map: This turbine is located in a documented area of heavier flight path use and is near Hoboken Creek and what appears from aerial photography to be ephemeral, or seasonal, wetlands. This would be a reasonable turbine to consider as an alternative from a natural resources perspective.

For the Black Oak Wind Project, Turbine 9 shown on attached maps: Turbine 9 is adjacent to a public water wetland. The DNR encourages avoiding siting next to wetlands to decrease the collision risk to species using the wetland as habitat. This would be a reasonable turbine to consider as an alternative from a natural resources perspective.

Thank you for the opportunity to comment regarding Site Permit modifications to the Getty and Black Oak Wind Projects. Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Schrenzel".

Jamie Schrenzel  
Principal Planner  
Environmental Review Unit  
(651) 259-5115

Enclosures: 2

cc: Scott Ek, Minnesota Public Utilities Commission  
Suzanne Steinhauer, Minnesota Department of Commerce  
Patrick Smith, Geronimo Energy