

# Minnesota Department of Natural Resources

Division of Ecological Resources  
940 Industrial Drive South, Suite 103  
Sauk Rapids, Minnesota 56379



April 12, 2010

Mr. Bruce Jennings  
DeWild Grant Reckert and Associates  
Post Office Box 511  
Rock Rapids, Iowa 51246

Dear Mr. Jennings:

The Minnesota Department of Natural Resources has received your letter of March 16, 2010 regarding the prospective Getty Wind Farm Large Wind Energy Conversion System in western Stearns County, Minnesota. We offer the following comments for your consideration.

The proposed windfarm is located in an area of rolling topography in prairie pothole country. Although the prairie has been converted to cropfields in the windfarm boundary, there are numerous seasonal and semipermanent wetlands scattered throughout the site, along with restored grasslands on wildlife management units.

The Padua Wildlife Management Area (WMA) is located at the southwest corner of the project boundary. We recommend a minimum ½ mile setback from all WMAs for all wind turbines. There are also two U.S. Fish and Wildlife Service (USFWS) Waterfowl Production Areas (WPAs) in the vicinity of the project area. If you have not done so already, I encourage you to contact the USFWS Twin Cities Field Office at 612-725-3548. One is the Kenna WPA located in Sections 9 and 16 of Getty Twp. adjacent to the eastern boundary of the proposed windfarm boundary. The other is the Trisco WPA located in Section 6 of Getty Twp. and section 31 of Sauk Center Twp. The USFWS also recommends a minimum ½ mile setback from all WMAs for all wind turbines.

I conducted a drive-by avian survey of the proposed windfarm site on March 26, 2010. I noted a few scattered pairs of Canada geese (*Branta canadensis*) and mallards (*Anas platyrhynchos*) and numerous pairs of horned larks (*Eremophila alpestris*) throughout the area, an apparent pair of red-tailed hawks (*Buteo jamaicensis*) in Sections 5 and 6 of Getty Twp., and a few killdeer (*Charadrius vociferus*) and a northern harrier (*Circus cyaneus*). The WMAs and WPAs in the vicinity provide habitat during the breeding season and during migration for many other species of birds, and waterbirds often migrate between wetland complexes. We understand that many of the proposed turbine locations are speculative at this point. However, several are located in or adjacent to wetlands or wetland complexes. The most problematic site is turbine #14, which is

[www.mndnr.gov](http://www.mndnr.gov)

AN EQUAL OPPORTUNITY EMPLOYER



PRINTED ON RECYCLED PAPER CONTAINING A MINIMUM OF 10% POST-CONSUMER WASTE

located in or at the edge of a farmed wetland. On March 26<sup>th</sup>, I saw 110 tundra swans (*Cygnus columbianus*) sitting on or flying in and out of this wetland, along with 60 Canada geese and over 200 mallards and ring-necked ducks (*Aythya collaris*) sitting on the wetland. Other problematic turbines that are too close to either WMAs/WPAs, wetlands, or wetland complexes are #7, 16, 22, 23 and 27. In addition, turbines #1, 2, 3, 13, 15, and 25 appear to be within flyways related to the wetland complexes present.

Another high value wetland that is located on private property is in the SE1/4 of Section 4 of Getty Twp. Last year, during the first year of a 5-year effort to develop a breeding bird atlas for Minnesota, this wetland was discovered to support a breeding colony of black terns (*Chlidonias niger*) and red-necked grebes (*Podiceps grisegena*). So far, there have only been 10 confirmed breeding locales for black terns, and 15 for red-necked grebes (see [www.mnbba.org](http://www.mnbba.org)).

The southwest portion of the project boundary contains part of a Central Region Regionally Significant Ecological Area (RSEA). The DNR Central Region identified these ecologically significant terrestrial and wetland areas by conducting a landscape-scale assessment based on the size and shape of the ecological area, land cover within the ecological area, adjacent land cover/use, and connectivity to other ecological areas. The purpose of the data is to inform regional scale land use decisions, especially as it relates to balancing development and natural resource protection. A GIS shapefile of this data layer can be downloaded from the DNR Data Deli at <http://deli.dnr.state.mn.us>. For more information on RSEAs, or to view pdf versions of the final maps, please visit <http://www.dnr.state.mn.us/rsea/index.html>. If you would like help interpreting the RSEA data, contact Hannah Texler, Regional Plant Ecologist for DNR's Central Region, at 651-259-5811.

The map attached to your letter implied that there are no natural heritage elements within the proposed windfarm boundary. This is inaccurate. There are records of the Powesheik skipper (*Oarisma powesheik*), a state-listed species of special concern, in the project area. Additionally, in 1997, there were breeding season observations of the marbled godwit (*Limosa fedoa*), a state-listed bird of special concern, and the upland sandpiper (*Bartramia longicauda*) in the vicinity of the project. If you have not done so already, please contact Lisa Joyal, DNR Endangered Species Environmental Review Coordinator, at 651-259-5109 to arrange for a Natural Heritage Database element search. There is a fee for this search.

Also please be aware that any transmission line crossings of Wildlife Management Areas or public waters requires a License to Cross Public Lands or a License to Cross Public Waters from the DNR. There are numerous Public Waters in the windfarm boundary, including an unnamed tributary to the Sauk River along the eastern edge of the windfarm boundary. For applications to cross public lands or waters, please contact Trina Zieman at 651-259-5792.

In summary, given the number of state and federal wildlife management lands, the number of semipermanent and seasonal wetlands present, and the documented avian resources in the area, this does not seem like a viable location for a windfarm. However, if the project is proposed to proceed, we recommend 1 full year of pre-application and 2

full years of post-construction avian and bat surveys be conducted to adequately assess the year-around use of the site by these resources.

Thank you for the opportunity to review the preliminary information. If you have any questions, I may be reached at 320-255-4279, ext. 235.

Sincerely,

A handwritten signature in cursive script that reads "Michael R. North".

Michael R. North  
Regional Environmental Assessment Ecologist

ERDB 20100605

Cc: Fred Bengtson, Tim Bremicker, Randall Doneen, Lisa Joyal, Joe Kurcinka, Nick Snavely, Hannah Texler, Jan Wolff, Trina Zieman (DNR)  
Rich Davis, Tony Sullins (USFWS)