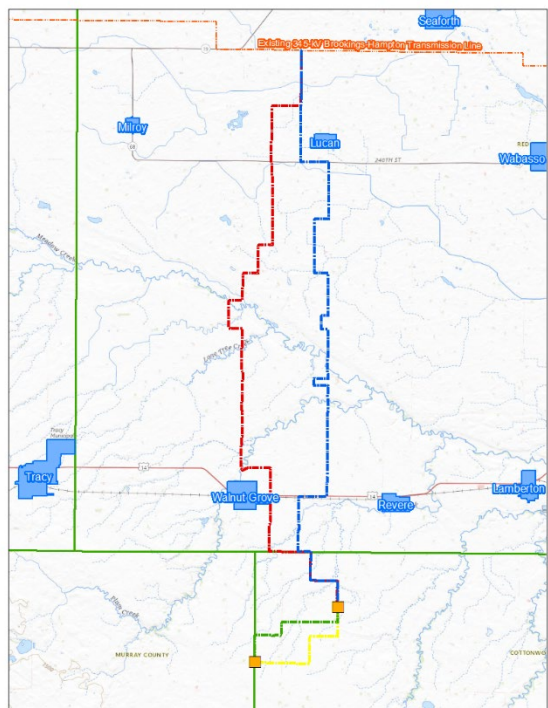


Plum Creek Wind Project Final Environmental Impact Statement
Appendix G: Comment Response Document



May 2021
Docket Numbers IP6997/CN-18-699, IP6997/WS-19-700,
IP6997/TL-19-701

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Attachments

Attachment 1 Comments Received

1 Introduction

This appendix contains all of the oral and written comments received on the draft environmental impact statement (DEIS) and the draft site permit (DSP) for the Plum Creek Wind project, and responses to these comments by Department of Commerce, Energy Environmental Review and Analysis (EERA) staff. A draft site permit was issued by the Commission on October 30, 2020; the draft EIS was issued on January 11, 2021. Comments on these drafts were solicited by EERA staff through public meetings and a public comment period.

Commission and EERA staff jointly held a public meeting on the DEIS and the DSP on February 1, 2021. Due to the current COVID-19 pandemic and the suspension of in-person meetings, the DEIS and DSP meeting was held via remote access technology. The public comment period ended on February 12, 2021.

Notice of and instructions on how to participate in the meeting were posted on the Commission's eDocket and the Department's Energy Facilities web pages, the EQB Monitor (January 12, 2021, Volume 45, Number 2), and published in the Cottonwood County Citizen, the Lamberton News, and the Murray County Wheel-Herald and Southwest Peach newspapers.

A total of 5 oral commentors and 5 written comments were recorded during the public meeting and written comment period.

2 Methodology

Minnesota Rule 7850.2500, Subpart 9, states that the Department shall respond to the timely substantive comments received on the draft environmental impact statement consistent with the scoping decision and prepare the final environmental impact statement. The term "substantive" is not defined in Rule. Dictionaries define this term to mean "having practical importance, value, or effect" or "involving matters of major or practical importance to all concerned." In the context of environmental review, this term generally has been interpreted to include a comment that addresses some specific aspect of the project or the environmental review document, rather than simply expressing a preference for or against the project.

Comments received can range from statements of support for, or opposition to, a proposed action under review by the agency, to detailed critiques of the EIS's analyses. Comments might identify errors of fact, highlight areas of controversy, identify omissions, or provide new information. An agency's focus in preparing the final EIS is the consideration of and response to these comments. The comment-response process includes all steps from receipt and consideration of comments through the preparation of responses and any needed revisions to the EIS. The agency cannot complete the EIS process until it has considered and responded to these comments in the final EIS. The comment-response process helps the Commission make better-informed decisions.

In preparing the Final EIS, EERA staff considered all comments to the extent practicable. An identification number was assigned to each originator of a comment, including those expressed orally at the public meeting (**Table 1**). For individuals who submitted comments containing multiple points, sequential numbers were assigned to each commenter's distinct point; for example, Comment 9-4 refers to the 4th comment by the commenter assigned as number 9.

Table 1: Draft EIS Commenters

| Commenter Number | Commenter Name | Commenter Agency or Organization |
|---------------------------------|-----------------------|--|
| Oral Commenter – Public Meeting | | |
| 1 | Nathan Runke | Private Citizen – member Local Union 49 |
| 2 | Dallas Dolan | Vesta Township Supervisor |
| 3 | Kevin Maas | Private Citizen |
| 4 | Lucas Franco | Private Citizen – member Laborers Union |
| 5 | Larry Chapman | Private Citizen |
| Written Commenter | | |
| 6 | Dave & Bonnie Doubler | Private Citizen |
| 7 | Karen Kromar | Minnesota Pollution Control Agency |
| 8 | Cynthia Warzecha | Minnesota Department of Natural Resources |
| 9 | Jordan Burmeister | Applicant – National Grid Renewables |
| 10 | Kelly Gragg-Johnson | Minnesota State Historic Preservation Office |
| 11 | Jessica Welu | Southwest Regional Development Commission |

3 Description of Comments Received

After reviewing and analyzing the comments received, a summary table of issues and responses was developed for each commenter.

Transcripts from the public meeting, as well as scanned images of the original written comments received are included in their entirety in **Attachment 1** to this appendix. The commenters are identified in the preceding table. All comment documents on the Draft EIS, as included in this comment-response document, have been entered into the administrative record for this EIS. Individual responses for each comment are provided in **Table 2**.

Table 2: Summary of Issues and Response

| Comment Number | Summary of Issues | EERA Response |
|-----------------------|--|---|
| 1-1 | As a member of Local 49 equipment operators, Mr. Runke expressed the importance of using local labor in the construction of these wind energy production facilities as they can be a significant source of employment. | <p>The DEIS contains a discussion on potential work-force impacts in Section 3.3.5.3-<i>Local Economy</i> (pp. 75-81) and Section 6.4.5-<i>Socioeconomics</i> (pp. 166-168).</p> <p>This comment is also applicable to the DSP. Section 10.5-<i>Labor Statistic Reporting</i>, of the DSP contains a reporting requirement that the Permittee must provide labor statistics so the Commission can track the use of local labor.</p> <p>No changes, edits, or additions to the DEIS were necessary.</p> |
| 2-1 | Mr. Dolan, Vesta Township Supervisor, inquired about the extent of the 150-foot HVTL ROW into adjacent properties when paralleling roadways. | <p>Both the HVTL Route Permit Application (Section 2.4, pp. 10-11) and the DEIS (Section 4.1.2.2, pp. 129-130) provide an accurate description of ROW sharing.</p> <p>No changes, edits, or additions to the DEIS were necessary.</p> |
| 2-2 | Additionally, Mr. Dolan asked about potential damages to township roads during construction and the consequential repairs. | <p>The comments concerning potential local roadway damage and repair is applicable to both the sample Route Permit (RP) and the DSP. Section 5.3.13-<i>Public Roads</i>, of both permits contains a requirement that the Permittee make satisfactory arrangements with the appropriate governmental unit for maintenance and repair of roads.</p> <p>The issue of roadways is covered adequately in Sections 3.3.7.1-<i>Infrastructure</i> (LWECS) and Section 6.4.9-<i>Transportation</i> (HVTL) of the DEIS.</p> <p>No changes, edits, or additions to the DEIS were necessary.</p> |
| 2-3 | Continuing, Mr. Dolan asked about potential damages to township landowner drain tile during construction and the consequential repairs. | <p>The comments concerning potential drain tile damage and repair is applicable to both the RP and the DSP. Section 5.3.19-<i>Damages</i>, of the RP and Section 5.3.20-<i>Drainage Tiles</i>, of the DSP require the Permittee to promptly repair or replace all drainage tiles broken or damaged.</p> <p>The issue of drain tiles is covered adequately in Sections 3.3.9.1-<i>Cropland</i>, (LWECS) and Section 6.6.1-<i>Agriculture</i>, (HVTL) of the DEIS.</p> <p>No changes, edits, or additions to the DEIS were necessary.</p> |

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| 3-1 | Mr. Maas expressed concern that the Cottonwood River alignment, along the proposed Red Route, impacts more wetlands relative to the proposed CSAH 5 alignment. | Section 5.3- <i>Alternative Alignments and Route Segments Discussion of Impacts</i> , within the DEIS contains a comparison of these two alignments. No changes, edits, or additions to the DEIS were necessary. |
| 3-2 | Mr. Maas second question assumes that wind turbines would not be sited in wetlands, so how can HVTL structures be sited in wetlands? | The DEIS states (Section 3.3.2.5- <i>Wetlands</i> , p. 48) that turbines for the wind farms are sited and built in upland, higher elevation areas to maximize the wind resources and, in doing so, will avoid direct impacts to wetlands and surface waters. Relative to on the ground impacts, the DEIS states that turbine tower foundations have a ground-level diameter of roughly 20-feet (p. 23), while transmission line structures have a diameter of 9-feet (p. 196). No changes, edits, or additions to the DEIS were necessary. |
| 3-3 | Mr. Maas further states that the Laura Ingalls Wilder site lies within the proposed alignment/ROW of the Red Route. | The Ingalls Dugout Site (a NHRP-nominated site), is located approximately 1.5 miles north of the town of Walnut Grove and approximately <u>250 feet east</u> of the Red Route along the banks of Plum Creek (DEIS Section 6.4.7- <i>Cultural Values</i> , p. 171). No changes, edits, or additions to the DEIS were necessary. |
| 4-1 | As a member of the local laborers' union, Mr. Franco expressed the importance of using local labor in the construction of energy development projects and supports the workforce reporting language in the DSP. | Thank you for your comment, response to comment 1-1 also deals with this issue. No changes, edits, or additions to the DEIS were necessary. |
| 5-1 | Mr. Chapman was wondering if the type of wind turbine being proposed changed, whether due to external or internal forces, how would that affect the EIS document. | Should the Permittee desire to make a post-permit change in the number, location, or make/model of turbine to be used at the site, the Permittee would be required to submit a request for permit amendment to the Commission (see DSP Section 12.4- <i>Modification of Conditions</i> and Section 13- <i>Permit Amendment</i>). The comparative potential environmental impacts discussion would be required as part of said request. No changes, edits, or additions to the DEIS were necessary. |
| 5-2 | Additionally, Mr. Chapman had questions concerning the responsibilities for decommissioning the site at the end of use. | The DEIS discusses the decommissioning of the site and the project components (Section 3.1.3- <i>Project Decommissioning</i> , pp. 28-29 for the LWECs and Section 4.1.7- <i>Transmission Project Decommissioning</i> , p. 139 for the HVTL). No changes, edits, or additions to the DEIS were necessary. |

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| | | The DSP, Section 11.1-Decommissioning Plan, requires the Permittee file, on an on-going basis, updated decommissioning plans, including information identifying all surety and financial securities established for decommissioning and site restoration of the project in accordance with the requirements of Minn. R. 7854.0500, subpart 13. |
| 5-3 | Mr. Chapman also asked about developing and evolving technologies potential effect on these LWECS project. | <p>Recently, the Commission has seen a number of projects originally developed and permitted 10-15 years ago coming before the Commission for an amendment to the existing permit to upgrade components (larger turbines, blades, generators, etc.) in what is termed “Repowering” in efforts to modernize and lengthen a projects lifespan.</p> <p>No changes, edits, or additions to the DEIS were necessary.</p> |
| 5-4 | In his last comment, Mr. Chapman wanted to know what happens to the various easements granted for the project once the projects useful life has ended. | <p>The anticipated lifespan of a wind farm is on the order of 30 years (DEIS Section 3.1.3-<i>Project decommissioning</i>), however, as stated above it is not uncommon for these projects to come before the Commission in a “Repowering” proceeding. In circumstances where the project is decommissioned it is typical for leases to be terminated and landowners released from those leases.</p> <p>It should also be noted that in practice because they have few mechanical elements and are designed and constructed to withstand the weather extremes typical of the region, high-voltage transmission lines are seldom completely retired. It is possible that, following the retirement or decommissioning of a wind farm, another entity may seek to leave the transmission line in place to support other transmission activities (DEIS Section 4.1.7-<i>Transmission Project decommissioning</i>, p.139).</p> <p>No changes, edits, or additions to the DEIS were necessary required.</p> |
| 6-1 | The Doublers expressed concern regarding the potential impacts to the local bald eagle population and general habitat of the area. | <p>Thank you for your comment.</p> <p>Please note that the DEIS discusses (<i>Section 3.3.4-Natural Resources</i>), the potential impact to the natural environment, including local eagle populations.</p> <p>Additionally, the LWECS DSP (Section 7.5-Avian and Bat Protection) contains a requirement for the preparation of an Avian and Bat Protection Plan.</p> |

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| | | No changes, edits, or additions to the DEIS were necessary. |
| 7-1 and 7-2 | The Minnesota Pollution Control Agency (MPCA) submitted several comments. The first and second comments deal with the presence of impaired surface water in the project vicinity. Specifically, the MPCA provided a list of local impaired waters and noted that due to anticipated acres disturbed a NPDES/SDS CSW and corresponding SWPPP will be required as a “down-stream” permit. | The DEIS (Section 3.3.2.4- <i>Surface Waters</i> and Figure 5a/5b- <i>Surface Waters Map</i>) identifies the five MPCA impaired waters which lie within the project area: the Des Moines River, Plum Creek (Judicial Ditch 20A), Pell Creek, Dutch Charlie Creek, and Devils Run Creek. Highwater Creek (07020008-519) and Dry Creek (07020008-520) lie outside the project area. No changes, edits, or additions to the DEIS were necessary. |
| 7-3 | The MPCA felt that the DEIS did not adequately discuss measures to protect surface waters. | The DEIS discusses, throughout the document, the requirement of the Permittee to obtain “down-stream” permits (NPDES/SDS CSW and corresponding SWPPP) designed to assure the protection of surface waters from construction/operation activities of the project (Section 3.3.2.4- <i>Surface Waters/Mitigation</i> , pp. 45-46; Section 3.3.2.5- <i>Wetlands/Mitigation</i> , pp. 49-50; Section 3.3.4.2- <i>Wildlife/Mitigation</i> , p. 67; Section 4.1.3.4- <i>Construction</i> , p.135; Section 6.8.1- <i>Surface Waters/Mitigation</i> , p.209; and Section 6.8.3- <i>Wetlands/Mitigation</i> , p. 213. These discussions, while not exhaustive, include examples of BMPs. No changes, edits, or additions to the DEIS were necessary. |
| 7-4 | The MPCA felt that the DEIS did not provide an adequate level of detail on stormwater management practices required for treatment of runoff post construction for the new impervious surfaces resulting from the Project; including the amount of new impervious surfaces created by the Project and the method of treatment (i.e., infiltration basins or other stormwater volume reduction) proposed. The MPCA noted that all buildings, tower foundations, access roads, parking areas are impervious surfaces that require stormwater management. | Additional detail has been added to Section 3.3.2.4-Surface Water, (pages 45-46) of the EIS. |
| 7-5 | The MPCA encourages the Permittee to utilize native plantings within the site where feasible, both to assist with stormwater management and to provide pollinator habitat. | The DEIS does contain discussions (Section 3.3.4.3-Vegetation, pp. 68-71, and Section 6.6.1-Agriculture, pp.194-196) on potential impacts to vegetation and agricultural lands, and the requirement for preparation and submittal of a Vegetation Management Plan and a Agriculture Mitigation Plan should a permit be granted. No changes, edits, or additions to the DEIS were necessary. |
| 8-1 | The Minnesota Department of Natural Resources (DNR) submitted | Section 5.3.3- <i>Public Services</i> , of the Sample HVTL Route permit and |

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| | several comments. First, the DNR noted that the Red Rock Rural Water System serves many residences within the project boundary area and encourages the Permittee to work with the rural water system to ensure that water supply lines are not disturbed during road construction, electrical line installation, or turbine installation. | Section 5.3.4- <i>Public Services</i> , of the DSP requires that during construction, the Permittee shall minimize any disruption to public services or public utilities. No changes, edits, or additions to the DEIS were necessary. |
| 8-2 | The DNR requested that a “DNR Water Appropriation Permit” be added to Table 1 since the need for a concrete batch plant is being considered. | A Water Appropriations Permit may be required if temporary dewatering activities are needed during construction and/or if a temporary concrete batch plant is determined to be necessary (DEIS, p. 38). Table 1 in the FEIS has been edited to include the potential Water Appropriations Permit. |
| 8-3 | The DNR noted that the DEIS (p. 67) states that Plum Creek will conduct one year of post-construction Project monitoring for birds and bats to assess operational impacts to birds and bats; the DNR supports a two-year requirement. | The DEIS (p. 67) reiterates commitments made by Plum Creek in their Amended Site Permit Application (p.112). Section 7.5.1- <i>Operational Phase Fatality Monitoring</i> of the DSP requires the Permittee to conduct a minimum of two full years of avian and bat fatality monitoring following the commencement of the operational phase of the facility. The FEIS (p. 67) has been edited to include the two years of monitoring requested by the DNR. |
| 8-4 | The DNR requested edits to Table 29- <i>Comparison of Factors Cottonwood River Alternative Alignment</i> , to account for the number of Cottonwood River crossings. | Table 29 in the FEIS has been edited to include the number of Cottonwood River crossings. |
| 9-1 | The Applicant (National Grid Renewables, fka Geronimo) pointed out that the DEIS describes the length of the HVTL as 30-miles and 31-miles in various places; it should be 31 miles. | The FEIS has been edited for consistency to reference the length of the HVTL as 31 miles. |
| 9-2 | The Applicant requests that the discussion on Eminent Domain within the DEIS (p. 132) reflect the language from Plum Creek’s notice of applications. | The statement “If Plum Creek and a landowner are unable to negotiate an easement for the HVTL right-of-way, Plum Creek reserves the right to evaluate whether the use of eminent domain is appropriate under Minn. Stat. Ch. 117, based on specific circumstances” has been added to the FEIS (p. 132). |
| 9-3 | The Applicant requested that the DEIS be edited (p.178) to reflect Jordan Burmeister’s testimony regarding Plum Creek’s modification options to address MNDOT’s concerns along the Blue Route and US Highway 14. | The FEIS has been edited (p. 178) to include the Applicant’s “work around” to address MNDOT’s concerns along US Highway 14. |

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| 9-4 | The Applicant suggest that the land requirement delta between the generic solar generation alternative and LWECS be included in the DEIS analysis of alternatives. | The footprint (acres) required for a specific MW LWECS and a solar facility is discussed in various places within the DEIS (p. 70, p. 85, and p. 119). No changes, edits, or additions to the DEIS were necessary. |
| 9-5 | The Applicant notes that Plum Creek has applied to the Federal Aviation Administration for approval to use an ADLS system for the Wind Farm. | The DEIS (p. 88) includes that Plum Creek has stated that it will coordinate with the FAA on potential implementation of an Aircraft Detection Lighting System (ADLS) for the Project. No changes, edits, or additions to the DEIS were necessary. |
| | The Applicant suggests that a comparison route alignment Cottonwood River Alternative and Alternative Route Segment Blue E with their counterparts be included in the Relative Merits section. | These comparisons are made in the DEIS in Section 5.3- <i>Alternative Alignments and Route Segments/Discussion of Impacts</i> . No changes, edits, or additions to the DEIS were necessary. |
| 9-6 | The Applicant requests that the authors of <i>Appendix-Electric and Magnetic Fields Supplemental Paper</i> be identified. | Appendix F was assembled by EERA staff; sources for the information contained within the appendix are provided in the references section. No changes, edits, or additions to the DEIS were necessary. |
| 9-7 | The Applicant notes that Plum Creek anticipates that mitigation discussions will take the better part of 2021 to reach resolution. Plum Creek anticipates that the agreed-upon mitigation solution will most likely include removal of a relatively small subset of the Project's turbine positions and/or use of the project's proposed ADLS system as "in-fill" radar to offset any negative visual impacts to the Tyler CARSR line of sight. | Thank you for your comment. No changes, edits, or additions to the DEIS were necessary. |
| 9-8 | The Applicant notes that due to the NORAD radar issues to be worked out Plum Creek expects that the project's anticipated commercial operation date may occur in 2023 rather than during 2022 as originally anticipated and request that the timeline in the DEIS Section 3.1.2- <i>Project Cost and Schedule</i> be updated. | The FEIS (p. 28) has been edited to update the timeline. |
| 9-10 | The Applicant points out that the discussion on schedule in the DEIS (p. 140) appears to contain language that reflects a different docket. Plum Creek requests it be updated for consistency with a 2023 in-service date for the Wind Farm and transmission line. | The FEIS (p. 28 and p. 140) has been edited to update the timeline and correct errors. |
| 10-1 | Due to the nature and location of the proposed Project, the Minnesota State Historic Preservation Office (SHPO) recommended that a Phase Ia archaeological assessment be completed in addition to the literature review that was completed. If, as a result of this assessment, a Phase I | The comments concerning potential impacts to archaeological features are applicable to both the sample Route Permit (RP) and the DSP. Sections 5.3.16 (LWECS) and 5.3.14 (HVTL)- <i>Archaeological and Historic Resources</i> , of both permits contains a requirement that the |

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| | archaeological survey is recommended, this survey should be completed. The Phase I survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. | Permittee shall make every effort to avoid impacts to identified archaeological and historic resources when constructing the project facilities. In the event that a resource is encountered, the Permittee shall contact and consult with the State Historic Preservation Office and the State Archaeologist. No changes, edits, or additions to the DEIS were necessary. |
| 11-1 | SWRDC Staff approves of the Draft Environmental Impact Statement and is unaware of any objections to the draft EIS. It is noted that this statement applies to the draft Environmental Impact Statement itself, and not the project in its entirety. | Thank you for your comment. No changes, edits, or additions to the DEIS were necessary. |

4 Changes to the Draft EIS

In preparing this Final EIS, EERA considered comments received during the scoping period and public comment period on the Draft EIS. EERA also considered comments and input from “down-stream” permitting agencies in the preparation of the Final EIS. The EIS was also revised based on EERA’s internal technical and editorial review of the Draft EIS (i.e., changes made to the EIS that were not in response to a comment received).

Table 3 provides a summary of the substantive revisions made from the Draft EIS to the Final EIS based on agency and public comments. Additions to the EIS appear as underlined passages, while deletions appear as strikeouts.

Table 3: Summary of Changes to the Draft EIS

| EIS Section | Revision(s) to Draft EIS |
|---|--|
| Front Matter | Update cover sheets, and footers throughout the document, to reflect the new designation as the Final EIS. The table of contents with the addition of Appendix G-Comment Response Document. |
| Summary | Correction from 30 mile to 31 miles for length of the HVTL. |
| 1. Introduction | Page 7, added updated information to reflect receipt and handling of comments on the DEIS. |
| 2. Regulatory Framework | Page 16, update document as to release of DEIS, the public meeting and comment period on the DEIS and development of the comment response document. Page 16, update document as to the Public and Evidentiary hearings. Page 18, addition of the potential Water Appropriation Permit from the DNR. Page 19, Table 1, the addition of the potential Water Appropriation Permit. |
| 3. Proposed Wind Farm and System Alternatives | Page 45 to 46, added information on the anticipated impervious surfaces and possible mitigative measures for stormwater control. Page 68, correct the post-construction Project monitoring for birds and bats to assess operational impacts from the stated one year to two years. |
| 4. Proposed Transmission Project and System Alternatives | Page 134, added Plum Creek’s preferred language relative to the use of eminent domain. Page 142, updated the anticipated schedule and corrected errors. |
| 5. Transmission Project – Routing Alternatives | Page, Table 29, addition of a line item to account for the number of Cottonwood River crossings (count). |
| 6. Transmission Project – Affected Environment, Potential Impacts and Mitigation Measures | Page 156, corrected the statement referring to the number of crossings of the Cottonwood River along the Alternative Alignment. Page 180, updated to add Plum Creek’s options to resolve the potential aerial encroachment of US 14 along the Blue Route. |
| 7. Cumulative Effects | No changes are made to this section. |
| FIGURES | No changes are made to the DEIS figures. |
| APPENDICES | Added Appendix G Comment Response Document. |
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ATTACHMENT 1 COMMENTS RECEIVED

In The Matter Of:

Plum Creek Wind Farm Project - Public Meeting

18-699 18-700 18-701

February 1, 2021

*Shaddix & Associates
7400 Lyndale Avenue South
Suite 190
Richfield, MN 55423*

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| <p style="text-align: right;">Page 1</p> <p>1 DEIS AND SITE PERMIT PUBLIC MEETING 2 18-699 18-700 18-701 3 FEBRUARY 1, 2021 4 BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION 5 AND DEPARTMENT OF COMMERCE 6 7 PLUM CREEK WIND FARM PROJECT 8 9 10 11 12 13 14 15 WEBEX AND TELEPHONIC 16 17 18 19 20 21 22 23 24 25 COURT REPORTER: Janet Shaddix Elling, RPR</p> | <p style="text-align: right;">Page 3</p> <p>1 OPERATOR: Thank you for standing by. 2 Welcome to the Plum Creek DEIS and draft 3 site permit meeting. 4 At this time all participants are in a 5 listen-only mode. After the speaker presentation, 6 there will be a question and answer session. If you 7 ask a question during the session you will need to 8 press *1 on your telephone. 9 Please be advised that this conference is 10 being recorded. If you require any further 11 assistance, please press *0. 12 I will now like to turn the conference 13 over to your speaker today, Mr. Scott Ek. 14 Thank you. Please go ahead. 15 MR. SCOTT EK: Thank you, Abigail. 16 Good evening. My name is Scott Ek, I am 17 an energy facilities planner with the Minnesota 18 Public Utilities Commission. And welcome to the 19 February 1st draft site permit and draft 20 environmental impact statement public meeting for 21 the proposed Plum Creek Wind Project. 22 As described in the meeting notice that 23 was sent out, this meeting is being conducted 24 remotely through Internet and telephone in 25 accordance with the governor's executive orders</p> |
| <p style="text-align: right;">Page 2</p> <p>1 I N D E X 2 SPEAKER PAGE 3 Scott Ek 3 4 Jordan Burmeister 10 5 Bill Storm 16 6 Nathan Runke Commenter #1 22 7 Dallas Dolan Commenter #2 24 8 Kevin Maas Commenter #3 28 9 Lucas Franco Commenter #4 32 10 Larry Chapman commentter #5 34 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> | <p style="text-align: right;">Page 4</p> <p>1 concerning the COVID-19 pandemic. 2 So you can see, if you're on the WebEx, 3 if you'd like to view the presentation, we have a 4 PowerPoint presentation that's being displayed on 5 WebEx. So if you go to minnesota.webex.com and type 6 in the meeting information, the event number -- the 7 event number, I'm sorry, is 146-589-5982, and this 8 information was included in the notice. And you can 9 join the meeting tonight by telephone to listen via 10 audio or provide verbal comments. And the number is 11 1-866-609-6127, and the conference number for that 12 is 4136159. 13 Just a moment here, bear with me. 14 So the agenda for tonight's meeting will 15 include this PowerPoint presentation that will 16 provide a summary of the state's site and route 17 permit application review process, followed by a 18 description of the proposed project by the 19 applicant, Plum Creek Wind, LLC, and ending with a 20 brief discussion on the draft site permit and draft 21 environmental impact statement that has been 22 prepared for this proposed project. 23 And most important is the remainder of 24 the meeting which is reserved for questions and 25 comments from those of you on the telephone. As</p> |

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| <p style="text-align: right;">Page 5</p> <p>1 Abigail indicated at the beginning of the meeting, 2 throughout the presentation you may press *1 on your 3 phone if you're interested in asking questions or 4 providing comments, then you'll be placed into a 5 queue and then we'll take your comments in an 6 orderly manner at the end of the presentation. 7 So the Plum Creek Wind Project is a 8 proposed 414 megawatt large wind energy conversion 9 system that would include a new approximately 10 31-mile 345 kilovolt transmission line that would 11 connect the facility to the electrical power system. 12 The project is being proposed by Plum 13 Creek Wind Farm, LLC under its parent company, 14 National Grid Renewables, they were formerly known 15 as Geronimo Energy, that's when this project started 16 out and they've since changed their name to National 17 Grid Renewables. 18 Jordan Burmeister with National Grid 19 Renewables will provide additional details on this 20 project later in the presentation. 21 So before a project such as this can be 22 constructed, the Public Utilities Commission needs 23 to issue a certificate of need, and that's because 24 the wind facility is greater than 50 megawatts and 25 it includes a transmission line that connects the --</p> | <p style="text-align: right;">Page 7</p> <p>1 first bullet, the certificate of need, they look at 2 the type of the facility, that is, could another 3 facility, a different type facility better provide 4 this energy. They look at the size of the facility, 5 should it be bigger, should it be smaller. And the 6 timing, is it appropriate to place this facility 7 into service now or would it be better sometime in 8 the future. And that's for the certificate of need 9 portion. 10 The Commission also looks overall at 11 maintaining an efficient, cost-effective and secure 12 power supply and -- power supply and electric 13 transmission infrastructure. 14 And the next bullet is more of the 15 environmental and the human impacts. And a lot of 16 that information -- all of this information is 17 covered in the environmental impact statement, but 18 the environmental impact statement -- and Bill will 19 cover this, Bill Storm with the Department of 20 Commerce a little later in the presentation, but it 21 looks at these are just some examples of the items 22 that are evaluated in an environmental document, an 23 EIS in this case, an environmental impact statement. 24 We look at noise, aesthetics, public services, 25 impacts on agriculture, historic resources, air and</p> |
| <p style="text-align: right;">Page 6</p> <p>1 that would connect the wind farm to the electric 2 transmission system. A site permit for the wind 3 farm is also needed because the wind farm is greater 4 than five megawatts. And, lastly, a routing permit 5 is required for the high voltage transmission line 6 because the line is greater than 100 kilovolts and 7 greater than 1,500 feet in length. So the project 8 needs three decisions: A certificate of need, a 9 site permit, and a route permit. 10 So at the end of this review process, 11 once we -- we'll go -- the next slide is a timeline 12 of the review process, but at the end of this review 13 process, the Commission makes a final decision on 14 whether to issue the certificate of need, site 15 permit, and route permit. The Commission takes into 16 consideration many things. The comments received by 17 interested citizens, local governments, the 18 environmental impact statement, they review the 19 permit application, and many other documents that 20 are included in the record of the case. 21 In addition to all that information, the 22 Commission bases its decision on a number of factors 23 and criteria that are set out in state rule and 24 statute. This screen just provides a few of the 25 items the Commission considers. For example, the</p> | <p style="text-align: right;">Page 8</p> <p>1 water quality, natural resources, flora and fauna, 2 there's a very long list and this just provides you 3 with a few of the items. 4 So as I said, following is the estimated 5 review timeline. You can see the application was 6 filed back in November of 2019. We're here tonight 7 where it's highlighted in green, the draft site 8 permit and draft EIS meeting. After tonight you can 9 see there will be a public hearing that will be held 10 in a couple weeks, February 16th, and notices should 11 be going out on that in a day or two. The public 12 hearings, I should say, are conducted by an 13 administrative law judge and they'll be in a similar 14 format as tonight. 15 The public hearings are generally the 16 last opportunity in the review process for public 17 participation. Much like tonight, members of the 18 public will get to ask questions and provide 19 comments, but on the merits of the project during 20 the hearing, whereas tonight we're specifically 21 looking for comments on the draft environmental 22 impact statement that was prepared as well as the 23 draft site permit that was prepared for the proposed 24 wind farm. 25 So after the public hearing closes and is</p> |

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| <p style="text-align: right;">Page 9</p> <p>1 completed, there is a written comment period tied to 2 that as well. The Department of Commerce will then 3 prepare the final EIS, and Bill will -- Bill Storm 4 will get into that more later in the presentation. 5 But they prepare a final EIS that responds to 6 comments that are received tonight and during the 7 following comment period after this meeting. 8 After the final environmental impact 9 statement is prepared, the administrative law judge 10 will issue findings of fact, conclusions of law, and 11 recommendations to the Commission, and the 12 Commission will take that information, the EIS and 13 all the information in the record and make the 14 decisions I spoke about earlier. So that's just a 15 quick review of a summary of the review process for 16 this case. 17 So that next I'm going to turn it over to 18 Jordan Burmeister with National Grid Renewables to 19 provide a description of the proposed project. But 20 before that I want to let folks know that this live 21 presentation, the draft site permit, the draft 22 environmental impact statement, the application and 23 much more, all the information in the record is 24 available on the Commission's eDocket system for 25 viewing and download. Information on how to access</p> | <p style="text-align: right;">Page 11</p> <p>1 as Scott mentioned, that is formerly known as 2 Geronimo Energy. 3 The project location is within 4 Cottonwood, Murray, and Redwood counties. And the 5 wind facility, the project area, is approximately 6 73,000 acres and that's shown in the presentation by 7 the orange area on the map. 8 The project, as far as the transmission 9 line, there's two routes proposed, two options 10 there. And each line is approximately 31 miles long 11 and go from the site on the map, the orange area, 12 and kind of meanders north up to where it will 13 interconnect to the transmission grid at a point on 14 the existing 345 kilovolt Brookings to Hampton 15 transmission line. That route is within Cottonwood 16 and Redwood counties, and where it'll interconnect, 17 the line will be at a point along that line in 18 Redwood County towards the north and top side of the 19 map as shown on the presentation there. 20 As far as the target commercial operation 21 date for the project, it's targeted for the end of 22 2022. 23 As far as facilities and more detail on 24 the project, what will be, you know, involved as far 25 as infrastructure out there, you know, could be up</p> |
| <p style="text-align: right;">Page 10</p> <p>1 the eDocket system and other information is provided 2 later in the slide show. It's also included in the 3 notice for tonight's meeting. At the end of the 4 presentation, I'll have a slide that will just stay 5 up that will provide all that information so you can 6 write it down, if you like. 7 Also, just a reminder for those of you on 8 the telephone, you can press *1 on your phone if you 9 would like to provide a question, or ask a question 10 or provide a comment. We'll take your comments 11 after the presentation, so thanks for your patience. 12 Okay, Jordan, are you ready? 13 MR. JORDAN BURMEISTER: Yes. Thanks, 14 Scott. 15 All right. Thank you. As Scott 16 mentioned, I'll be -- I'm with the Plum Creek Wind 17 Farm and National Grid Renewables, and I'll be 18 giving a full review and kind of recap on the 19 project details this evening. 20 All right. As far as the project 21 overview, on, you know, the overall project, it's a 22 414 megawatt wind energy facility that will also 23 include a 345 kilovolt transmission line. The 24 project is being developed, the Plum Creek Wind Farm 25 is being developed by National Grid Renewables, and</p> | <p style="text-align: right;">Page 12</p> <p>1 to, as mentioned before, 414 megawatts, of which 2 entails approximately 78 turbines. And that'll 3 depend on the model selected. On a couple of the 4 following slides I'll do kind of a high level 5 overview of the two layouts that are currently 6 proposed. 7 The site will often include underground 8 collection lines, those would be at a 34.5 kilovolt 9 voltage and those will be between the turbines, 10 connecting the turbines back to the project 11 substation. 12 There will also be access roads to the 13 turbines that will be utilized during construction 14 as well as the long term operation of the project. 15 Up to four permanent meteorological towers during 16 operations, and then two project substations for 17 collecting the project power from the turbines, we 18 have the collection system and also an operations 19 and maintenance building, and than lastly here the 20 project is proposed to utilize the aircraft 21 detection lighting system, ADLS. So it's kind of an 22 overview of the details for the infrastructure on 23 the project. 24 As far as the two layouts, this is layout 25 number one, this is for a Vestas V162, which is a</p> |

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1 5.6 megawatt turbine. The blue dots are shown as
2 primary turbines and the green are alternative
3 turbines. And so that shows -- that's kind of what
4 this map shows here.
5 And the next map, not too much of a
6 difference as far as the dots except for the
7 coloring. This is for a SG170 model turbine, this
8 is a 6.2 megawatt turbine. And, again, the blue
9 locations are the primaries and the green are the
10 proposed alternative sites.
11 As far as the transmission line, the
12 right-of-way proposes a 150-foot-wide, structure
13 height, approximately 110 to 125 foot tall
14 structures, and as far as the span between the
15 structures is roughly 650 feet between the lines.
16 So the map shown here on the bottom end, the two
17 boxes, are the project substations where they'll
18 collect the power from the turbines, the underground
19 collection lines, and then that power will be sent
20 north via the two alternative routes north up to the
21 point of interconnection on the top side of the map
22 here.
23 And that's all I have as far as a project
24 summary this evening. Again, my contact information
25 is here as well as Jenny Monson-Miller's if there's

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1 any other questions. But that's all I have this
2 evening.
3 MR. SCOTT EK: Okay. Thank you, Jordan.
4 This is Scott Ek again with the Public
5 Utilities Commission. I'm going to go over, just
6 quickly go over the draft site permit, a few items
7 about what the draft site permit is and where it can
8 be found, and then I'll turn it over to Bill Storm
9 with the Department of Commerce who will go over the
10 draft environmental impact statement.
11 So the Commission issued a draft site
12 permit for the wind facility on October 30th. And
13 so the issuance of the draft site permit, basically
14 it affords the public an opportunity to review and
15 provide comments on the requirements and conditions
16 that should be included in a final site permit,
17 should it be issued. It's beneficial to receive
18 input on those unique site specific conditions,
19 typically known best by those folks living in the
20 area, or by the local governments with knowledge of
21 the site in the area. So that's what the draft site
22 permit is for. The availability of a draft site
23 permit does not imply that a final permit will be
24 issued, as the Commission can change the draft site
25 permit in any respect before final issuance, or may

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1 deny the site permit. So its sole purpose is to aid
2 in the application review process and gather
3 important information that's needed in the process.
4 A copy of the draft site permit, and the
5 draft environmental impact statement, for that
6 matter, can be found at either of the following
7 locations. The Department of Commerce website, and
8 the Commission's eDocket system, which I spoke about
9 earlier. I will -- again, I'll put this information
10 up at the end of the presentation on one slide so
11 you'll be able to write it down and, also, this is
12 information that was included in the notice for
13 tonight's meeting as well so it should be available
14 for you there.
15 This is an important slide. After
16 tonight there is a written comment period, and we'll
17 accept written comments on the draft site permit as
18 well as comments on the draft environmental impact
19 statement through February 12th. Specifically, I'll
20 talk about the draft site permit and the comments
21 we're looking for there. We want folks to focus
22 their comments on additional conditions or
23 requirements that should be included in the site
24 permit that would help minimize, mitigate, or avoid
25 impacts of the proposed project. So information

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1 that concerns you as a landowner, as you'd be living
2 by the project or the project would be near you in
3 your town, and from the local governments that I
4 spoke of earlier, information from them is always
5 helpful to be considered in a draft -- in a final
6 permit, I should say, should it be issued. And,
7 again, we'll provide this information again later in
8 the presentation.
9 So I will turn it over now to Bill Storm
10 with the Department of Commerce and who prepared the
11 draft EIS. And are you ready?
12 MR. BILL STORM: Yeah, sure, Scott,
13 thanks.
14 Good evening. This is Bill Storm. As
15 Scott said, I work for the Department of Commerce
16 EERA, Energy Environmental Review and Analysis
17 group. My group is charged with assisting the
18 Commission in the environmental review and what we
19 do is we end up writing the environmental document.
20 As Scott mentioned earlier, the Plum
21 Creek project requires three approvals from the
22 Commission. The first approval is a certificate of
23 need, which would cover both the wind farm and the
24 transmission line. A second thing, they need a
25 route permit for the transmission line. And third

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| <p style="text-align: right;">Page 17</p> <p>1 they need a site permit for the wind farm. Items 2 one and two require environmental documents, and in 3 this case it's an environmental impact statement. 4 The Department, we issued a draft environmental 5 impact statement on July 11th of this year. The EIS 6 addresses the environmental requirements for the 7 certificate of need and the environmental 8 requirements under the rules for the transmission 9 line for the proposed project. It corresponds to 10 the docket CN 18-699 and TL 18-701, CN standing for 11 certificate of need and TL standing for transmission 12 line. 13 Next. Basically what is an environmental 14 impact statement. The environmental impact 15 statement describes the project and any alternatives 16 that came up through scoping and also issues that 17 came up through scoping. It assesses the human and 18 environmental impacts from the proposed project, as 19 well as those impacts associated with any 20 alternatives that were included in the scope. And 21 the scope is basically just a document that defines 22 the table of contents or the content of the 23 environmental document. It identifies strategies to 24 avoid or mitigate impacts, so it identifies 25 potential impacts, it also identifies ways that</p> | <p style="text-align: right;">Page 19</p> <p>1 at a hard copy, you can view a hard copy there. 2 Note that because of the pandemic the library hours 3 may be restricted so you want to call them first. 4 If you want a hard copy for yourself, you can 5 contact me and we can print one up and send one out 6 to you. The only caveat I'd make to that is it'll 7 take a week to ten days for you to actually get the 8 copy because we're only printing them on a demand 9 basis. 10 And as with the draft site permit, we are 11 seeking the public's input on the draft EIS. The 12 comments that are generated tonight and through the 13 comment period for the draft EIS, those comments 14 will be -- will help inform me, help me develop the 15 final EIS. So there may be some areas where you 16 don't think I gave it enough attention or you think 17 I missed something or I might need to expand on the 18 area, this is your opportunity to put those comments 19 forth and when I put out the final EIS it will 20 incorporate the comments that were collected tonight 21 and through the comment period and the document will 22 be edited accordingly. 23 So if you -- as with the draft site 24 permit, if you want to make a comment on the draft 25 EIS, the comment period is open through</p> |
| <p style="text-align: right;">Page 18</p> <p>1 these impacts could be avoided, minimized, or 2 mitigated. It does not advocate a position, it just 3 provides the factual information for the Commission 4 so they can weigh, where they have options, where 5 they can weigh them. It provides an objective 6 comparison between alternatives, between the red 7 route and the blue route or between the wind farm 8 versus some other form to generate the electricity. 9 Okay. Next, Scott. 10 Okay. The draft EIS has been out since 11 January 11th. You can view it. There's several 12 ways you can view it. You can go to the 13 Department's website, the EERA basic website, follow 14 the URL that's listed on the slide there, look at 15 the Plum site project, and then you'll see a listing 16 of all of the documents, the draft EIS being one of 17 those documents. You can also view the draft EIS on 18 eDockets, and you just enter the year, it's 18, and 19 you enter one of the docket numbers, and you'll see 20 a register, a list of documents, and in that list 21 you'll find the draft EIS. 22 And also I sent hard copies of the draft 23 EIS to three libraries, the Tracy Public Library, 24 the Lamberton Public Library and the Westbrook 25 Public Library. So you can go, if you want to look</p> | <p style="text-align: right;">Page 20</p> <p>1 February 12th. Please include docket numbers on 2 your correspondence. It just makes it easier to 3 track, because we do have other projects with 4 comments coming in. And as with the draft site 5 permit where Scott went through what he's seeking or 6 what we're seeking you to focus on, on the draft EIS 7 what I'm asking the public to focus on is what 8 information needs to be clarified or included in the 9 draft EIS to make sure that the final EIS is 10 complete and accurate. 11 Okay, Scott. 12 So you can send your comments either on 13 the draft site permit or the draft EIS to me, to my 14 attention, Bill Storm. Again, by February 12th. 15 And you can do it online, you can go online to the 16 Department's URL that's listed there and there's a 17 way you can comment electronically. You can email 18 your comments to me, you can fax your comments to 19 me, and of course you can also mail them. 20 Okay, Scott. 21 There's just additional information. If 22 you want to see the full record, that's what 23 eDockets is all about. If you want to get on the 24 mailing list to get notices on when the final EIS 25 will be out or when the hearing will be that's</p> |

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| <p style="text-align: right;">Page 21</p> <p>1 coming up, you can sign up to receive those notices 2 also through the eDocket system. 3 All right, Scott. 4 Just a list of the state agency contacts. 5 The public advisor is Charley Bruce. If you have 6 questions about how to participate or the process in 7 general you can certainly contact Charley. Scott, 8 of course, you can contact Scott, he's on staff of 9 the PUC. And me if you have any comments or 10 questions. Even if you don't want to make a comment 11 on the draft EIS and just want some edification 12 comments you can contact me and we can discuss. 13 MR. SCOTT EK: So that's the end of our 14 slide show, Bill. 15 MR. BILL STORM: Okay. I'll turn it back 16 to you then, Scott. 17 MR. SCOTT EK: Great. Thank you, Bill. 18 So now that's the end of the slide 19 presentation, we'll go ahead and open the meeting to 20 comments and questions. So, again, if you're 21 interested in providing a comment, press *1 on your 22 phone and you'll be placed into a queue. So when we 23 come around to you, the operator will unmute your 24 phone and you'll be able to provide a comment. 25 When you are talking, if you could please</p> | <p style="text-align: right;">Page 23</p> <p>1 MR. SCOTT EK: Yes, Nathan. 2 MR. NATHAN RUNKE: My name is Nathan 3 Runke, N-A-T-H-A-N, R-U-N-K-E. I work with the 4 local union, Local 49 for the equipment operators. 5 And I guess my only comment would be to hopefully 6 have the scope of it kind of include like a local 7 workforce being involved in the creation of this. 8 We feel like these wind energy production facilities 9 like this are a huge part and an important part for 10 Minnesota here and we just want to make sure that it 11 is Minnesotans that are helping to build it 12 themselves. 13 I'm sorry if I lost you. 14 MR. SCOTT EK: Oh, I'm sorry, Mr. Runke. 15 Yes, thank you for your comments. And I guess I'd 16 note that, yeah, that's a specific item we include, 17 it's included in the draft site permit, there's a 18 mention of local labor, and we're tracking that as 19 well. 20 MR. NATHAN RUNKE: Thank you. 21 MR. SCOTT EK: Thank you. 22 OPERATOR: And, again, to ask a question 23 you will need to press *1 on your telephone. 24 Our next question comes from Dallas 25 Dolan. Your line is now open.</p> |
| <p style="text-align: right;">Page 22</p> <p>1 state your name and spell it for the court reporter, 2 who is also listening in and is transcribing the 3 meeting, then we'll have meeting notes of all the 4 comments and questions provided by folks. 5 If you could please try to limit your 6 comments initially to three minutes so we can be 7 sure to have time to hear all who want to 8 participate. And if time allows, what we'll do is 9 we'll just come back to the queue and take 10 additional questions, you just need to hit *1 and we 11 can come back to you and keep going through until 12 we've answered all the questions we can or taken all 13 the comments we can. 14 So thank you for listening. Thanks for 15 your patience. 16 And, Abigail, I guess we can open it up 17 to questions from those on the phone, please. 18 OPERATOR: Sure. And if anyone would 19 like to ask a question, you will need to press *1 on 20 your telephone. To withdraw your question, press 21 the # or hash key. 22 Our first question is from Nathan Runke. 23 The line is now open. 24 MR. NATHAN RUNKE: Are you guys able to 25 hear me?</p> | <p style="text-align: right;">Page 24</p> <p>1 MR. DALLAS DOLAN: Yeah, this is Dallas 2 Dolan, I'm a supervisor in Vesta Township, and I 3 also have some land alongside the proposed electric 4 line that they're going to be installing. 5 I was wondering about the easement, it's 6 150 feet wide, is that from the center of the pole, 7 75 feet each way, or is it from the pole 150 feet 8 out into the field? 9 And I was wondering about damage fixing 10 to the township roads when they're building it, and 11 as far as installing, you know, approaches and stuff 12 into their -- their substation sites. 13 And that's about it. 14 MR. SCOTT EK: Okay. Thank you. 15 I guess, let's see. Could somebody from 16 National Grid speak to -- we have a question on the 17 right-of-way, and is it from center, you know, from 18 the poles, you know, 150 feet out? There is a 19 question on damage to township roads and installing 20 approaches and whatnot. 21 MR. JORDAN BURMEISTER: Scott, I can take 22 that question. 23 And hi, Dallas, Jordan Burmeister here 24 with National Grid Renewables on behalf of the Plum 25 Creek Wind Farm.</p> |

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| <p style="text-align: right;">Page 25</p> <p>1 Yeah, to answer your question there, as 2 far as the transmission line right-of-way, the 150 3 foot, our easements will generally cover -- include 4 the road right-of-way then the 150 is from the edge 5 of the road right-of-way into the field. And our 6 poles are generally placed as close as we can to the 7 road right-of-way, along the road right-of-way, or 8 if it's along a fence line, you know, adjacent to 9 the fence line. So that 150 foot refers to the edge 10 of the right-of-way into the field for allowing the 11 construction of the transmission line. 12 And then as far as the township roads and 13 all roads within the project, yeah, we will 14 coordinate with the local county and townships to 15 coordinate on a development agreement that will 16 include the, you know, maintenance and kind of the 17 flow of traffic throughout the project during 18 construction and kind of utilizing specific roads 19 and then also repairs to those roads as well, 20 whether that's prior to construction or post 21 construction. But we do do a road evaluation prior 22 to construction as well to get kind of the level of 23 what types of roads we have out there, where there 24 might be issues, and where we can address some of 25 those maybe prior to construction at least so we</p> | <p style="text-align: right;">Page 27</p> <p>1 make maybe hips here and then to not impact poles 2 and then during construction to mitigate any issues 3 as well. So a very key important part of, you know, 4 the preconstruction process that we do pay close 5 attention on, on collecting tile maps and, you know, 6 getting as much information as we can to prevent any 7 issues during construction. But if there are -- and 8 if there is damage, you know, that is something that 9 we definitely do repair. Sometimes we can't prevent 10 all damage to tile and, you know, whether it's the 11 wind farm or the collection lines, those are made 12 during the time of construction. 13 MR. DALLAS DOLAN: Okay. Thank you. 14 MR. SCOTT EK: Is that all you had? 15 Mr. Dolan? 16 MR. DALLAS DOLAN: Yes. 17 MR. SCOTT EK: Is that all you had for us 18 today for questions or comments? 19 MR. DALLAS DOLAN: I guess I was just 20 wondering how big the north substation was. It's 21 not too far from a wetland, but I'm sure you've 22 looked into that already. 23 MR. SCOTT EK: This would be a question 24 for either Jordan or Bill. 25 MR. JORDAN BURMEISTER: I could take it.</p> |
| <p style="text-align: right;">Page 26</p> <p>1 have an indication of the condition of that road 2 prior to construction so we can coordinate through 3 that development agreement to address any concerns 4 and things as far as repairs and remove stuff, too. 5 So we'll be coordinating with that when we get 6 closer to the start of construction. 7 Hopefully that answers your questions 8 there, Dallas? 9 MR. DALLAS DOLAN: Pretty much. 10 I guess I had another question on tile 11 lines. Are they going to notify the farmers to mark 12 their tile lines so they can put that cribbing so 13 they don't damage them when they drive over them? I 14 know that other 345 volt line that they're hooking 15 into they didn't do that for me and they damaged 16 quite a few tile lines. 17 MR. JORDAN BURMEISTER: Yeah, another 18 good question there. As far as tile, we do, as far 19 as our process, during our development of our 20 projects, do request tile maps from the landowners 21 so that we can identify where they're located, you 22 know. And then prior to construction try to flag 23 those where we can when we're starting to install 24 the poles or even prior to that when we're designing 25 it and locating specific pole placement. So we can</p> | <p style="text-align: right;">Page 28</p> <p>1 Yeah, as far as, you know, designing the 2 substation location, we did do wetland delineations 3 within the project and identified any issues with 4 those, you know. I can't speak to specifically 5 exact locations at this time, but, you know, it is 6 sited to avoid wetlands as it's proposed. 7 MR. DALLAS DOLAN: Okay. 8 MR. SCOTT EK: Thank you, Mr. Dolan. 9 MR. DALLAS DOLAN: You're welcome. 10 MR. SCOTT EK: Abigail, could you let the 11 next speaker through? 12 OPERATOR: And our next question comes 13 from Kevin Maas. Your line is now open. 14 MR. KEVIN MAAS: Thank you. Kevin Maas, 15 M-A-A-S. 16 A couple of questions. In particular, 17 regarding the red route, since the last meeting 18 there was an adjustment made to the route, as I 19 understand it, the Cottonwood River alignment 20 requested by the DNR. And from my perspective, it 21 seems like that alignment, or realignment really 22 increases the amount of wetlands affected rather 23 than decreasing the impact on the environment. 24 Noting that it's my understanding from the map that 25 in that alignment, the Cottonwood River alignment, a</p> |

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1 portion of the red line, the red route, that it jogs
2 a half mile west and a mile north and back again to
3 County Road 5. In doing so, it guarantees that land
4 that's been designated by the NRS as wetlands can't
5 be avoided. So that's a comment. I think that
6 proposed alignment section creates some very
7 significant concerns.
8 Related to that comment is a question.
9 Would a wind tower be placed in a wetland? I'm
10 assuming the answer to that is no, it wouldn't be
11 allowed. So my question is then how do we reconcile
12 that with transmission lines and those towers and
13 the significant impact on wetlands? I'll just leave
14 that as a comment, no need to respond.
15 Third comment is I noted in some of the
16 considerations that are addressed in considering the
17 project, there's reference to cultural, historical
18 factors, and I would point out that the red line, as
19 it jogs around the city of Walnut Grove and finds
20 its way to County Road 5 does so in a manner that
21 again seems to be designed to maximize its wetland
22 impact relative to the Cottonwood River -- no, not
23 the Cottonwood, the Plum Creek River, stream,
24 trickle. And also from a cultural standpoint, it
25 seems to go out of its way to make sure it includes

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1 the Laura Ingalls Wilder site within the
2 right-of-way. That's a cultural consideration and
3 certainly should be taken into account.
4 So those are my three comments. I'm done
5 if anyone wants to respond to those, and I'm more
6 than happy to entertain comments. Thank you.
7 MR. SCOTT EK: Thank you, Mr. Maas. And
8 I hope I had the pronunciation of your name right.
9 I don't know, Bill, is this something
10 that you'd want to --
11 MR. BILL STORM: Yeah, I can respond a
12 little bit to that comment.
13 If you take the time and go look at the
14 draft EIS, there is a table, a comparison table of
15 that. Look at the red route, the segment of the red
16 route that crosses the Cottonwood relative to the
17 alternative that was included in the scope that was
18 also studied, the Cottonwood River alternative, the
19 one that they came up with through the DNR's
20 comments. So we have looked at them and that
21 information is in the draft EIS. So the Commission
22 will have the data and they can make a
23 determination, and if they would pick the red route,
24 they could then make a determination of whether the
25 proposed route going up 5, or the Cottonwood

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1 alignment, they would have to pick one of them two.
2 Again, also to the draft EIS, if you
3 track it down through the information I've provided,
4 you also see there's a section in there that talks
5 about cultural values and it certainly definitely
6 covers and identifies and recognizes the Laura
7 Ingalls dugout and how the red route approaches that
8 area a bit. So the information is in the draft EIS.
9 I would encourage you to look at the draft EIS, if
10 you get the time, and I know it's not exciting
11 reading. And if you look through there, especially
12 the two issues that you mentioned, and if you see
13 something that you want me to expand on, you know,
14 certainly submit a comment.
15 As far as the placement of poles in
16 wetlands, that is definitely -- they try to make an
17 attempt to avoid that, as well as floodplains, too.
18 In some instances you can stand them, some instances
19 you can't. I can't really speak to a transmission
20 line versus a turbine tower, you know, for the wind
21 tower. But I know the towers are almost always
22 placed to avoid -- the turbine towers to avoid the
23 wetlands, but it's also in the nature of the tower
24 to want to be up on a higher elevation because you
25 want to capture the wind.

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1 I hope that addresses your comments. And
2 definitely feel free to contact me or, like I said,
3 look at the draft EIS and make a comment if you
4 think something needs to be flushed out a little
5 more.
6 Thank you, Scott.
7 MR. SCOTT EK: All right.
8 MR. KEVIN MAAS: Thank you.
9 MR. SCOTT EK: Thank you, Mr. Maas.
10 Abigail, could we get the next commenter,
11 please?
12 OPERATOR: There are no further questions
13 at this time. Please proceed.
14 MR. SCOTT EK: Oh, okay. Again, so I'll
15 ask if anybody listening are interested in asking a
16 question, if so, press *1 and the operator will
17 unmute your phone and let you have a turn here.
18 OPERATOR: We have a question from an
19 anonymous line. Please state your first and last
20 name. Your line is now open.
21 MR. LUCAS FRANCO: Yes, good afternoon.
22 Can you hear me? I think I'm the anonymous line.
23 MR. SCOTT EK: Yes, I can hear you.
24 State and spell your name, please.
25 MR. LUCAS FRANCO: Yes. My name is Lucas

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1 Franco, L-U-C-A-S, F-R-A-N-C-O. Thanks for taking
2 my comment. I'll keep it brief.
3 I work for the laborers union. We
4 represent construction workers across Minnesota,
5 many of which work on renewable energy projects.
6 I'm just calling in to support this project.
7 Our brothers and sisters in our union are
8 incredibly excited about the potential of this
9 project to create good, family-supporting jobs at a
10 time when folks really need those jobs. The
11 economic downturn caused by the COVID-19 crisis has
12 been really hard on our state, but particularly on
13 construction workers, so they're eager for good work
14 opportunities and this project has a potential of
15 creating a lot of good jobs for local workers. The
16 developer, Geronimo, has shown that they're willing
17 to work with the laborers and other trades and put
18 local workers first on the project, which is really
19 important and good to know. So maximizing the use
20 of local labor is just so important during this
21 downturn caused by COVID-19.
22 And the last thing I'll say is that the
23 project is being developed at a time when
24 transmission constraints are also limiting
25 opportunities to develop the abundant wind energy

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1 resources and solar resources across Minnesota, but
2 particularly in southwest Minnesota. And under
3 these circumstances, it's even more important that
4 the Commission ensure that each permitted project
5 maximizes local benefits and contributes to the
6 sustainability of local communities. And the use of
7 workforce reporting in the draft site permit is an
8 incredibly important and effective tool to help make
9 sure that projects maximize local labor.
10 So I appreciate the time and thank you
11 all. Have a great evening.
12 MR. SCOTT EK: Thank you, Mr. Franco.
13 It doesn't look, Abigail -- oh, it looks
14 like we do have another person that just popped up.
15 OPERATOR: And our next question from
16 Larry Chapman. Your line is now open.
17 MR. LARRY CHAPMAN: Larry Chapman,
18 L-A-R-R-Y, C-H-A-P-M-A-N.
19 Can you hear me?
20 MR. SCOTT EK: Yep. Go ahead,
21 Mr. Chapman.
22 MR. LARRY CHAPMAN: I was kind of
23 curious. I know with President Biden, he's pushing
24 for, you know, renewable energy projects, et cetera.
25 And as part of that he's also pushing for Buy

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1 American. And there were a couple I guess
2 alternatives for different wind towers that
3 presented itself, and obviously they have different
4 placements, from what I've seen on the project maps.
5 I'm kind of curious if this project -- if Biden
6 pushes for more stringent Buy American type
7 requirements for renewable energy, which might
8 impact some of the towers that are being proposed
9 for this project, how that would kind of play in to
10 the EIS in general because of the different, you
11 know, capabilities of the different towers, and if
12 that would at all be a consideration for the EIS
13 assessment?
14 MR. SCOTT EK: Thank you, Mr. Chapman. I
15 think I'm going to direct this question to Jordan at
16 National Grid Renewables. He can speak to the
17 different turbine types and possibly where they're
18 produced and the reasoning behind the two different
19 turbines to be used.
20 MR. JORDAN BURMEISTER: Hi Scott. Yeah,
21 I can try to answer the question, but, yeah, the two
22 turbine technologies that are considered, you know,
23 are the Vestas, the 162 and then the SG170. Yeah, I
24 don't have all the details as far as those in front
25 of me, or have a lot of details in front of me, but,

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1 you know, we're still evaluating, you know, the
2 policies and all that and how that'll affect any
3 projects. So I guess it's hard to speak
4 specifically to that at this time as far as how that
5 will play out with the project.
6 MR. LARRY CHAPMAN: Well, I guess my
7 concern is more should it potentially impact and
8 require a new EIS assessment, if you're required to
9 have a certain, you know, solution that's American
10 made. And, you know, those technologies impact, you
11 know, the design of the project itself.
12 MR. SCOTT EK: This is -- thank you,
13 Mr. Chapman. This is Scott Ek with the Commission.
14 I think what you're saying is, yeah, if
15 there was some type of law passed, of course, that
16 would impact, I guess, I imagine that would impact
17 how a developer would want to proceed with a project
18 depending on if we're requiring things to be
19 American made, you know, is indeed the case, yes, I
20 assume that would create, you know, the developer
21 would have to rethink, possibly rethink, depending
22 on what the law was. As part of the EIS, no, I
23 don't think that would impact anything in the EIS
24 that's already been studied. It would essentially
25 be akin to, you know, other requirements that the

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|---|---|
| <p style="text-align: right;">Page 37</p> <p>1 EIS points out that a developer would need to -- 2 other permits that they need to proceed, you know, 3 they need to get permit crossing permits from MnDOT, 4 they need a right-of-way agreement, you know, 5 different agreements and permits that would be 6 necessary, that would probably be in the list of 7 them then, should it ever pass into law, and it 8 would be just simply be identified. Does that kind 9 of help answer your question? 10 MR. LARRY CHAPMAN: It does to a certain 11 extent. I was just kind of curious, I would assume 12 that the EIS is kind of site specific. So if you 13 have a tower on a specific section of land, there 14 would be an EIS assessment for that parcel of land. 15 And because there's different placements for the 16 different tower technologies, you know, I'm assuming 17 that every -- every section that's within this EIS 18 study that's outlined in your map has been evaluated 19 for the EIS, I guess, fundamentally, is the 20 question. 21 MR. SCOTT EK: Yes, you're correct. You 22 know, if the project was to change, and the 23 boundaries and whatnot were to change, and 24 drastically change, yeah, that would be a 25 consideration for updating an environmental impact</p> | <p style="text-align: right;">Page 39</p> <p>1 decommissioning requirement which imposes certain 2 requirements on the applicant to assure that if and 3 when the project is done, that the materials and the 4 land is restored to the degree that it can be back 5 to normal. 6 MR. LARRY CHAPMAN: Did I read something 7 that indicated that as long as they are a viable 8 entity that they would be responsible for that? And 9 I might have read that incorrectly. I just want to 10 get some clarification around that. If for some 11 reason they no longer exist, you know, is there a 12 surety bond or something like that held to ensure 13 that on the decommissioning side of things that 14 everything can be taken care of? 15 MR. BILL STORM: Yes, the site permit has 16 a bonding requirement and also requires them to 17 review the status of not only the technology as far 18 as recycling and disposal, but also to keep the 19 company updated with financial securities. 20 MR. LARRY CHAPMAN: Okay. Thank you. 21 I've got another question regarding just 22 the technology and stuff because it is evolving. 23 Are there, and this might not be -- well, it's 24 probably not applicable to the EIS, so maybe you can 25 just defer, or it might be relevant. But if you</p> |
| <p style="text-align: right;">Page 38</p> <p>1 statement. Because, yes, the EIS did evaluate the 2 project as it was proposed. So if things change, 3 then, yes, you'd have to consider -- consider those 4 changes in the environmental document. 5 MR. LARRY CHAPMAN: Okay. Thank you for 6 clarifying that one. 7 I have another question regarding kind of 8 the end of life, you know, cradle the grave aspect 9 of the project specifically on the decommissioning 10 side of things. Does the EIS go into detail in 11 terms of the decommissioning process, you know, if 12 there's any failure by Plum Creek Farm to remove any 13 towers at the end of life, transmission lines, all 14 those different things, how that would be 15 potentially mitigated? 16 MR. BILL STORM: Scott, do you want me to 17 take that? 18 MR. SCOTT EK: Yeah, I guess you can also 19 bring up the requirement in the permit. 20 MR. BILL STORM: The draft EIS discusses 21 what is known now, what the applicant feels they 22 know now about the decommissioning plan. There is a 23 decommissioning plan in the application, that 24 narrative is carried over to the draft EIS. But 25 more importantly, the site permit has a</p> | <p style="text-align: right;">Page 40</p> <p>1 were to, as technology improves, there's new 2 turbines and stuff like that, is there any intent 3 over time to upgrade or improve the turbine towers, 4 transmission lines, anything along that line? Kind 5 of the life cycle of the project. 6 MR. SCOTT EK: Yeah. I -- well, I guess 7 I'll start out and maybe Jordan can chime in from 8 National Grid Renewables. 9 I guess the applicant would, you know, 10 they're proposing the project as it is, and I don't 11 think that's something -- I don't imagine that's 12 something they're thinking about right now because 13 they're still seeking permits and still would need 14 to build the project. But I can tell you that there 15 are other projects that have been constructed, you 16 know, five, ten, 15 years ago, that they are coming 17 to the Commission to -- and what we call it is a 18 repowering, and they'll apply to the Commission to 19 upgrade their turbines, either put on larger 20 turbines, larger blades, sometimes even upgrade the 21 turbine itself, and that's called a repowering. And 22 there's a number of projects that we've already seen 23 and I imagine there will be more. As for this 24 project, they certainly have the opportunity to in 25 the future to do that and they would have to come</p> |

| | |
|---|--|
| <p style="text-align: right;">Page 41</p> <p>1 back to the Commission to get the appropriate 2 permits and whatnot to do that to the project. But 3 I wouldn't imagine that's something that they're 4 even thinking about right now. 5 I don't know, Jordan, do you have 6 anything you could add? 7 MR. JORDAN BURMEISTER: Scott, I think 8 you covered it well. And, yeah, we don't have any, 9 you know, discussion of any decommissioning or 10 repowering at this time and are not being considered 11 right now through this process. 12 MR. LARRY CHAPMAN: Okay. I assume there 13 would be a separate EIS for that or that would 14 probably not be required if they're repowering? 15 MR. SCOTT EK: Yeah, this is Scott Ek 16 with the Commission. No, there's not an 17 environmental document required for that. We do -- 18 and it's kind of a new -- it's akin to a permit 19 amendment. Essentially they're amending their 20 existing permit and so we require information on, 21 you know, what would these new larger turbines or 22 moving a certain turbine and what would the impacts 23 be compared to the impacts that were previously 24 studied. And we generally would have either a 25 comment period, and depending on the changes that</p> | <p style="text-align: right;">Page 43</p> <p>1 released from those leases. So that would be the 2 situation that would play out at the end of the life 3 of a project further down the road. 4 MR. LARRY CHAPMAN: Okay. Thank you. 5 All right. That's all I have. Thanks, I 6 appreciate it. 7 MR. SCOTT EK: Thank you, Mr. Chapman. 8 Abigail, I don't see anybody else in the 9 queue, do you? 10 OPERATOR: No, there are no further 11 questions. Please proceed. 12 MR. SCOTT EK: Okay. So if there are any 13 other folks on the line that have a question or 14 would like to provide a comment on the draft site 15 permit or the draft environmental impact statement, 16 please go ahead and press *1 and we'll wait to see 17 here. 18 Just a reminder, up on the screen, while 19 we're waiting to see if anybody is still interested 20 in speaking. Written comments on the draft site 21 permit and the environmental impact statement, the 22 comment period for those comments will be open 23 through February 12th. 24 As you can see on the screen, they can be 25 submitted online through an online forum, and they</p> |
| <p style="text-align: right;">Page 42</p> <p>1 are proposed, possibly a public meeting. And, you 2 know, the Commission tries to build a record that 3 way so they can make a decision on essentially 4 amending the permit to consider any additional 5 impacts that a repowering would cause. 6 MR. LARRY CHAPMAN: Okay. Appreciate 7 that. 8 And one last question on easements and 9 right-of-ways and stuff for private owners. If they 10 were granted, you know, if a private owner were to 11 grant an easement, in the event, you know, end of 12 project, end of life for the wind farm, you know, 13 they vacate, they remove any equipment on the 14 private property owners, and what happens to the 15 easements or any covenants that were granted to Plum 16 Creek? Are they conveyed back to the landowner, or 17 any idea how that might be structured? 18 MR. SCOTT EK: Jordan, I think, is that 19 something you could answer? 20 MR. JORDAN BURMEISTER: Yeah, I can cover 21 that. 22 Yeah, Larry, as far as the easements and 23 leases go, once a project would be decommissioned 24 and fully removed and everything, yeah, the leases 25 would be terminated and the landowners would be</p> | <p style="text-align: right;">Page 44</p> <p>1 can be submitted by email, fax, or U.S. mail. 2 Also, on the screen it shows information, 3 it shows the Department of Commerce website as well 4 as how to access eDockets. At either of those 5 locations you'll be able to find pretty much all the 6 documents relative to the review of this proposed 7 project to date. 8 There is going to be documents that will 9 be added, and if you want to be notified of those 10 documents that are added and when they're added, 11 you'd want to go ahead and subscribe to the docket. 12 And that's also shown on the screen. You go to the 13 eDockets and there's a subscribe to eDockets 14 selection that you can hit and you just follow the 15 prompts. And then you'll receive an email 16 notification when new documents are filed in the 17 case. 18 So it's not looking like we have any 19 other folks. I'll give it a few more minutes. 20 Again, press *1 on your phone if you're 21 interested in having a question or providing a 22 comment. And then also, as Bill said, any folks, 23 after this meeting is adjourned, if folks have 24 questions just about the project or about the 25 process, about the draft EIS, you can contact Bill.</p> |

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1 You can also contact me and I can help answer
2 questions about the review process and what the
3 Commission does. And there's also our public
4 advisor, Charley Bruce, with the Commission who can
5 answer questions about the process, the
6 participation process and how to provide comments.
7 Well, it looks like we're not going to
8 have any other folks interested in providing
9 comments tonight and so with that I guess we will
10 adjourn the meeting.
11 Thank you all for attending. I hope we
12 provided some information to you on the project and
13 look forward to any comments that we might receive
14 from you, or questions.
15 So have a good evening and I think we'll
16 adjourn the meeting.
17 Thank you, Abigail.
18 OPERATOR: Thank you.
19 And ladies and gentlemen, this concludes
20 today's conference call. Thank you for
21 participating. You may now disconnect.
22 (Public meeting concluded at 7:06 p.m.)
23
24
25

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1 STATE OF MINNESOTA)
2) ss.
3 COUNTY OF HENNEPIN)
4
5
6 REPORTER'S CERTIFICATE
7
8
9 I, Janet Shaddix Elling, do hereby
10 certify that the above and foregoing transcript,
11 consisting of the preceding 45 pages is a
12 correct transcript of my stenographic notes, and is
13 a full, true and complete transcript of the
14 proceedings to the best of my ability.
15 Dated February 12, 2021.
16
17
18
19 /s/Janet Shaddix Elling
20 JANET SHADDIX ELLING
21 Registered Professional Reporter
22
23
24
25

commenter #6

Jan. 14 2021
Walnut Grove
MN 56180

Dear Bill,

As I write, we see two bald eagles in our grove. The plan is to have a windmill located across the road from the grove. Very frequently, we see many bald eagles that would be negatively affected by windmills.

We are not able to attend the conversation in February, but please take the safety of our habitat into consideration

Thank-You

Dave & Bonnie Doubler

RECEIVED

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February 9, 2021

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

Re: Plum Creek Wind Farm and High Voltage Transmission Line
Draft Environmental Impact Statement
PUC Docket Number: IP6997/WS-18-700 and IP6997/TL-18-701

Dear Bill Storm:

Thank you for the opportunity to review and comment on the Plum Creek Draft Environmental Impact Statement (DEIS), for a proposed wind farm and high voltage transmission line to be located in Cottonwood, Murray and Redwood Counties, Minnesota (Project). Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Section 6.8 Natural Environment

- Attached is a list of all the surface waters in the area of the Project that are impaired, some of which were not identified in the DEIS. It is important for the Project to keep watershed runoff out of the streams by ensuring adequate best management practices (BMPs) are used during construction. In addition, if road crossings will occur on non-intermittent streams, they should be sized to allow for fish passage during low flow and during high flows where flow velocity could potentially prevent passage. Please direct questions regarding impaired waters to Katherine Pekarek-Scott at 320-444-7186 or katherine.pekarek-scott@state.mn.us.
- The Project covers a very large area that includes the presence of impaired waters, unnamed streams and many wetlands. Due to the size of the Project, it will ultimately disturb 50 or more acres where stormwater from the construction is also likely to discharge to these waters. Therefore, the Stormwater Pollution Prevention Plan (SWPPP) for the Project will require review and approval by the MPCA prior to National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit (CSW Permit) issuance.
- The DEIS indicates erosion and sediment control BMPs will be employed during construction but does not adequately discuss protective measures to protect the surface waters described in the DEIS or address additional requirements for discharges to the impaired waters. Additional requirements include stabilizing temporarily or permanently unworked soils within 7 days on any portion of the site and providing temporary sediment ponds where 5 acres drain to one location. In addition, the SWPPP will need to include plans for installation of redundant (double) downgradient sediment controls for unavoidable disturbances within 50 feet of surface waters, including wetlands within the site.

- The DEIS does not adequately discuss stormwater management practices required for treatment of runoff post construction for the new impervious surfaces resulting from the Project. The amount of new impervious surfaces created by the Project or the method of treatment is not clear. All buildings, tower foundations or solar panels, access roads, parking areas are impervious surfaces that require stormwater management. Permanent stormwater management will be required and must be included with the SWPPP. The CSW Permit requires that infiltration be used for stormwater management unless prohibited for one of the reasons listed in the permit. If site conditions prohibit use of infiltration then another method of stormwater volume reduction must be considered. Wet sediment ponds should be considered only if infiltration or other volume reduction method cannot be utilized. Please direct questions regarding CSW Permit requirements to Roberta Getman at 507-206-2629 or Roberta.Getman@state.mn.us.
- The Project proposer is encouraged to utilize native plantings within the site where feasible, both to assist with stormwater management and to provide pollinator habitat.

Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this Project, please contact me by email at karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,

Karen Kromar

Karen Kromar
Project Manager
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul
Katherine Pekarek-Scott, MPCA, Marshall
Roberta Getman, MPCA, Rochester
Randy Hukriede, MPCA, Marshall

Impaired Waters in the Plum Creek Project Area

Dutch Charley Creek (07020008-517)

Aquatic Life: Turbidity & Fish bioassessments

Dutch Charley Creek (07020008-518)

Aquatic Life: Turbidity, Benthic macroinvertebrates bioassessments & Fish bioassessments

Highwater Creek (07020008-519)

Aquatic Life: Total Suspended Solids (TSS)

Aquatic Rec: Escherichia coli (E.coli)

Dry Creek (07020008-520)

Aquatic Life: Benthic macroinvertebrates bioassessments & Fish bioassessments

Aquatic Rec: Escherichia coli (E.coli)

Pell Creek (07020008-535)

Aquatic Life: Turbidity

Unnamed Creek (07020008-545)

Aquatic Life: Fish bioassessments

Plum Creek (07020008-602)

Aquatic Life: Turbidity

Plum Creek (07020008-603)

Aquatic Life: Turbidity

Des Moines River (07100001-546)

Aquatic Life: Turbidity, fish bioassessments, benthic macroinvertebrates bioassessments

Aquatic Rec: Fecal coliform

Devil's Run Creek (07100001-668)

Aquatic Life: Fish bioassessment



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

February 11, 2021

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

**RE: LWECS Site Permit, and HVTL Route Permit Applications for the Plum Creek Wind Project and associated facilities in Cottonwood, Murray, and Redwood Counties
PUC Docket Numbers: WS-18-700 and TL-18-701**

Dear Mr. Storm,

Minnesota Department of Natural Resources (DNR) staff have reviewed the draft environmental impact statement (draft EIS) for the Plum Creek Wind Project and associated facilities. Our agency's comments and recommendations address specific information that needs to be clarified or included in the draft EIS to ensure that the final EIS is complete and accurate.

Red Rock Rural Water System

The Red Rock Rural Water System serves many residences within the project boundary area. The DNR recommends that Plum Creek work with the rural water system to ensure that water supply lines are not disturbed during road construction, electrical line installation, or turbine installation.

Water Appropriations

Section 3.3.2.1 states that a water appropriations permit may be required if temporary dewatering activities are needed during construction as well as for a temporary concrete batch plant to construct turbine foundations. Please add "DNR water appropriation permit" to Table 1, in the event that a permit is required.

Post-construction Fatality Monitoring

Section 3.3.4.2 of the draft EIS states that Plum Creek will conduct one year of post-construction monitoring for birds and bats to assess operational impacts. Recent Public Utilities Commission site permits have required two years of post-construction fatality monitoring. The DNR supports this two-year monitoring requirement.

Cottonwood River Alternative Alignment

Section 5.3 discusses the impacts associated with alternative alignments and route segments. The proposed Red Route alignment crosses the Cottonwood River six times due to the winding path of the river in this location, while the Cottonwood River Alternative Alignment crosses the Cottonwood River only once, just south of CSAH 4. To provide a more complete comparison of the Red Route alignment and the Cottonwood River alternative Alignment, the DNR recommends including the number of Cottonwood River crossings in Table 29 – *Comparison of Factors Cottonwood River Alternative Alignment*.

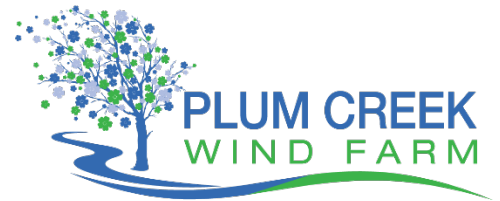
The DNR appreciates the opportunity to comment on the draft EIS for the Plum Creek Wind Project and associated facilities. If you have any questions about our agency's comments, please contact me at cynthia.warzecha@state.mn.us or 651-259-5078.

Sincerely,

/S/ Cynthia Warzecha
Energy Projects Planner

CC: Scott Ek, Minnesota Public Utilities Commission
Jenny Monson-Miller, National Grid Renewables
Joanne Boettcher, Minnesota Department of Natural Resources
HVTL ERDB #20200103
LWECS ERDB #20170252

commenter #9



February 11, 2021

VIA EMAIL: bill.storm@state.mn.us
Mr. Bill Storm
Environmental Review Manager
Energy Environmental Review and Analysis
Department of Commerce
85 Seventh Place East, Suite 280
St. Paul, MN 55101-2198

Re: Plum Creek Wind Farm – Comment Letter on the DEIS
Docket Nos. CN-18-699, WS-18-700 and TL-18-701

Dear Mr. Storm:

On behalf of Plum Creek Wind Farm, LLC (“Plum Creek”), I write to provide the following comments on the Draft Environmental Impact Statement (“DEIS”) for the Plum Creek Wind Farm (“Wind Farm”) and associated 345 kV transmission line (“Transmission Line”). Overall, the DEIS provides a comprehensive review of the potential environmental impacts of the proposed facilities that will inform the record. Plum Creek provides these limited comments to correct, clarify and supplement certain portions of the DEIS.

Corrections/Clarifications

- Throughout the DEIS, the Transmission Line is listed at 30 and 31 miles long. The correct length is 31 miles.
- The DEIS discusses eminent domain and states that Plum Creek has not indicated whether it has condemnation authority for acquiring easements for the transmission line. Plum Creek recommends that the final EIS include the following statement from Plum Creek’s Notice of Plum Creek Wind Farm, LLC’s Filing of Certificate of Need, Site Permit and Route Permit Applications with the Minnesota Public Utilities Commission:

Plum Creek has through voluntary agreements secured most of the private real estate rights necessary to construct the Project. If additional property rights are required for the Transmission Line, Plum Creek will seek to negotiate a voluntary easement agreement with each affected landowner. If Plum Creek and the landowner are unable to negotiate an easement for the right-of-way, Plum Creek reserves the right to evaluate whether the use of eminent domain is

appropriate under Minn. Stat. Ch. 117, based on specific circumstances.

Supplements

- Blue Route—Highway 14, p. 178. The section should include the response of Plum Creek to the Minnesota Department of Transportation’s (“MnDOT”) concern regarding the clear zone along the one-mile stretch where the route parallels Highway 14. As detailed in Jordan Burmeister’s Direct Testimony, pp. 8-10, Plum Creek has proposed either shifting the alignment 20 feet away from the road right-of-way or using the same alignment with a vertical single-pole configuration in this area to ensure the right-of-way for the Transmission Line does not overlap MnDOT right-of-way and avoids any impacts on the clear zone. MnDOT stated it did not have any concerns with these alternatives.
- The systems alternatives analysis includes a generic 414 MW solar generation alternative. Plum Creek believes that adding land requirements for such alternative would provide additional context and information about comparative environmental impacts.
- The DEIS references the potential implementation of an Aircraft Detection Lighting System (“ADLS”) for the Wind Farm, p. 88. Plum Creek has applied to the Federal Aviation Administration for approval to use an ADLS system for the Wind Farm.
- While the DEIS describes the Cottonwood River Alternative Alignment for the Red Route and Alternative Route Segment E for the Blue Route and compares them in Section 5.3, a discussion of these alternatives is not included in Section 6.12 Relative Merits of Route Alternatives. For completeness, Plum Creek recommends that these two segment alternatives be included in this summary discussion.
- Appendix F, “Electric and Magnetic Fields Supplemental Paper” is included with the DEIS but its authorship is not identified. Plum Creek Recommends that the author(s) be identified.
- North American Aerospace Defense Command (“NORAD”) has made a preliminary determination that the wind farm will have an adverse impact to NORAD missions for the Tyler MN Common Air Route Surveillance Radar (“CARSR”) system, if the Wind Farm is constructed as proposed, p. 112. Plum Creek formally entered into mitigation negotiations with NORAD in December 2020. Plum Creek anticipates that mitigation discussions will take the better part of 2021 to reach resolution. The climate policies and climate-focused political appointees of the new presidential administration are anticipated to improve the speed and availability of current and proposed mitigation options for wind farm developers with projects that fall within the line of sight of a military radar at or near saturation; however, confirmation of the new administration’s political appointees will likely not be complete until later this year. Plum Creek anticipates that the agreed-upon mitigation solution will most likely include removal of a relatively small subset of the Project’s turbine positions and/or use of the project’s proposed ADLS system as “in-fill” radar to offset any negative visual impacts to the Tyler CARSR line of sight.

Based on this timeline, Plum Creek expects that the project's anticipated commercial operation date ("COD") may occur in 2023 rather than during 2022 as originally anticipated. This COD should be updated in Section 3.1.2 of the DEIS. Plum Creek will provide additional detail regarding the project's updated commercial operation date once more clarity on timing comes out of the radar mitigation process.

Relatedly, Page 140 of the DEIS discusses an estimated schedule for construction of the proposed transmission line. It appears this language reflects the proposed schedule in a different docket. Plum Creek requests it be updated for consistency with a 2023 in-service date for the Wind Farm and transmission line schedule described for the wind farm on p. 28.

Sincerely,

/s/ Jordan Burmeister

Jordan Burmeister

Sr. Developer, Market Lead
National Grid Renewables
Jordan@geronimoenergy.com
P: 952-641-4044

72055893 v3



February 12, 2021

Mr. William Cole Storm
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

RE: Docket Numbers 18-699, 18-700, 18-701
Plum Creek Wind Project
Cottonwood, Murray and Redwood Counties
SHPO Number: 2019-0097

Dear Mr. Storm:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the above referenced project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.666).

According to Draft EIS, Plum Creek, LLC is proposing to develop a 414 MW Large Wind Energy Conversion System (Project) in Cottonwood, Murray, and Redwood Counties consisting of 67 to 74 wind turbines and an associated 31-mile 345 kV transmission line. The Project would also include the installation of above-or below-ground electric collection and communications lines; an above ground electric feeder line; two collector substations; four permanent meteorological towers; a sonic or light detection and ranging unit; two aircraft detection lighting system radars; an operation and maintenance building and new gravel access roads. The associated 345 kV transmission line would connect the wind facility to the existing Brookings-to-Hampton 345 kV transmission line via a new switching station.

It appears that a Phase Ia literature review was completed to inform the Draft EIS. However, due to the nature and location of the proposed Project, we recommend that a Phase Ia archaeological assessment be completed as well. If, as a result of this assessment, a Phase I archaeological survey is recommended, this survey should be completed. The Phase I survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking this type of research and archaeological surveys, please visit the website <http://www.mnhs.org/shpo/preservation-directory>, and select "Archaeologists, Contract" in the "Specialties" box.

The Project should consider not only direct impacts to cultural resources (both architectural properties and archaeological sites), but potential indirect impacts as well. The analysis completed for indirect impacts should take into account any introduction of visual, atmospheric or audible elements that may have an effect on cultural resources.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

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The resulting cultural resources report should include a map with clearly marked project areas including the wind turbines, laydown yards, crane paths, collector lines, access roads, and any other above-ground equipment structures (i.e. substation, O&M building, MET towers) in relation to any identified cultural resources (both architectural properties and archaeological sites). The report should discuss ways in which the Project will avoid impacting, both directly and indirectly, any cultural resources that are identified.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact me at kelly.graggjohnson@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist

From: [Jessica Welu](#)
To: [Storm, Bill \(COMM\)](#)
Cc: [Rosemary Bruce-White](#)
Subject: SRDC Written Comments on Plum Creek Wind Farm Draft EIS (Docket #18-699,18-700, 18-701). If questions, please contact Rosemary Bruce-White at our office.
Date: Friday, February 12, 2021 8:28:26 AM

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Southwest Regional Development Commission Project Review

Agenda Item: 6

Meeting Date: February 11, 2021

Project Name: Plum Creek Wind Farm, LLC Draft Environmental Impact Statement (DIS)

PUC Docket Numbers: IP6997/CN-18-699 (Certificate of Need), IP6997/WS-18-700 (Site Permit), and IP6997/TL-18-701 (Route Permit).

Project Description

The Department of Commerce authorized a combined Environmental Review and Environmental Impact Statement (ER and EIS). The Department of Commerce Energy Environmental Review and Analysis (EERA) is preparing that EIS so that it will address the certificate of need and route permit applications.

Staff Comments and Questions:

- During the SRDC Board of Directors meeting on October 10, 2019, the routes were described. No board member had any comments against the proposed routes, including county commissioners that serve in Cottonwood, Murray, and Redwood Counties.
- There was a public information/EIS scoping meeting on June 16, 2020, which provided community members the opportunity to 1) learn about the state permitting process and the proposed project and 2) to ask questions and provide comments on potential issues and alternatives to be considered for analysis for the EIS, or as a condition in a draft LWECS Permit. Attendees had concerns about bald eagle populations and decommissioning procedures.
- Each route was evaluated (known as Red, Blue, Yellow, and Green) on their impacts on Human Settlements/ Aesthetics, Public Health & Safety/EMF, Land-Based Economies/ Agriculture, Archaeological & Historic Resources, Natural Environment /Surface Waters, Rare and Unique Natural Resources, Use or Paralleling of existing ROWs, and Design-Route Dependent Costs.

- The Blue Route was identified to have minimal impacts on Use or Paralleling of Existing ROWs. No other impacts were identified.
- The Red Route was identified to have minimal impacts on Natural Environment/Wetlands, Rare and Unique Natural Resources. No other impacts were identified.
- The Yellow Route was identified to have minimal impacts on Natural Environment/Wetlands. No other impacts were identified.
- The Green Route was identified to have minimal impacts on Land-Based Economies /Agriculture, Natural Resources/Vegetation, and Use or Paralleling of Existing ROWs.
- The draft EIS was issued on January 11, 2021. Written comments will be accepted through February 12, 2021.
- Staff attended the online public meeting on February 1, 2021. Questions and comments provided during that meeting included:
 - Who will be the labor force used for the construction of the project?
 - If there are federal mandates on materials, will there be a second EIS?
- Staff approves of the Draft Environmental Impact Statement and is unaware of any objections to the draft EIS. It is noted that this statement applies to the draft Environmental Impact Statement itself, and not the project in its entirety. To review public comments and concerns on the Site Permit, Certificate of Need and Route Permit see the MNPUC website, and look up the Docket numbers above.

Review Time: 2 hours

Income from Project: \$0

Reviewer: Rosemary Brue-White, Development/Transportation Planner