

# **Appendix B**

## *Agency Correspondence*

# **Appendix B-1**

## Size Determination



Minnesota Statute § 216E.021 requires combining proposed solar energy generating systems for permitting purposes when certain conditions exist. The Department of Commerce requires the information requested below to determine 1) whether proposed solar energy generating systems meet the definition of a large electric power generating plant and, therefore, are subject to the Public Utilities Commission's siting authority; or 2) whether large electric power generating plants that are solar energy generating systems should be combined for permitting purposes. Based on the information provided, Commerce staff may require additional information to make a determination.

**Instructions:** Answer each question completely. Each question and answer must be clearly identified. Attach maps and supporting information as necessary. Return the signed and dated information to:

Louise Miltich  
Minnesota Department of Commerce  
85 Seventh Place East, Suite 280  
Saint Paul, MN 55101-2198

Phone: (651) 539-1853  
Fax: (651) 539-0109  
Email: [louise.miltich@state.mn.us](mailto:louise.miltich@state.mn.us)

Note: This form can be made available electronically, and submitted as an electronic document.

#### A. Project Description

Briefly describe the proposed project or projects, including name(s); need for the project(s); number of solar energy generating systems; alternating current nameplate capacity of the individual solar energy generating systems identified; and the combined alternating current nameplate capacity.

Winnebago Solar and Storage LLC ("Winnebago Solar and Storage"), a Delaware limited liability company and wholly-owned indirect subsidiary of GlidePath Development LLC (GlidePath), proposes an up to 150<sup>1</sup> megawatt ("MW") alternating current ("AC") photovoltaic ("PV") solar-energy generating system and associated battery storage at a single-site in Faribault County, Minnesota (the "Project") as indicated in the attached Figure 1. Winnebago Solar and Storage will be submitting an application to the Minnesota Public Utilities Commission ("PUC") for up to 150 MW AC of nameplate solar energy capacity, together with up to 50 MW AC of battery storage capacity as an associated facility.

---

<sup>1</sup> The Project capacity of up to 150 MW AC is based on the maximum, alternating current, power injection capacity of the facility that will be defined in the Generator Interconnection Agreement.

The approved interconnection capacity for 150 MW solar and 50 MW storage will come from a single interconnection request as one combined facility.

Construction of both the solar energy generation and storage components of the overall Project are expected to occur simultaneously. Additionally, Winnebago Solar and Storage intends to finance the Project's construction as a single combined project while also marketing the power generated by the facility with the power stored and metered back into the grid together. Operationally, there is not expected to be any discernable difference between the solar energy generation and storage components of the Project.

The Project will be located in Faribault County, and the Project area (i.e., land under lease, option, or easement) spans approximately 1,255 acres, with the anticipated project footprint being approximately 1,208 acres in Verona and Prescott Townships, Faribault County (Figure 1). The Project proposes to interconnect to the existing Northern States Power Huntley to Blue Earth 161 kilovolt (kV) transmission line, which transects the Project. Additionally, both the solar and storage components of the Project will use the same switchyard, which is to be permitted, constructed, and operated by Northern States Power.

The Project is necessary to meet the growing demand for additional renewable resources required to meet the Renewable Energy Standard set forth in Minnesota Statutes and other clean energy requirements in Minnesota, neighboring states, and the country at large, including the renewable energy and carbon reduction goals of Northern States Power Company, dba Xcel Energy.

## **B. Project Design and Location**

**Provide the following information regarding each solar energy generating system:**

B-1. Describe the 1) solar generating equipment and associated facilities; 2) project boundary location(s) (county, township, and sections); 3) the area within the project boundary (acres); and 4) area within the project boundary that will be developed for the solar project (acres).

The Project's permanent facilities may include:



**PUBLIC DOCUMENT - NONPUBLIC DATA HAS BEEN EXCISED**

- Solar modules, inverters, and racking;
- On-site buried electrical collection lines;
- A Project substation including one or more step-up power transformers;
- An overhead transmission line (gen-tie);
- Battery Energy Storage System (BESS) and collection system;
- Fencing;
- Access roads;
- An Operations and Maintenance (O&M) building; and
- Ancillary equipment and buildings as necessary.

The Project is planned in the following sections in Faribault County, Minnesota:

Township	Range	Section
103N	28W	11
103N	28W	12
103N	28W	13
103N	27W	7
103N	27W	18

The Project area includes approximately 1,255 acres in total (the “Project Area”) with 1,261 acres under solar lease and 12 acres under currently under purchase option.<sup>2</sup> The anticipated Project footprint is expected to be approximately 1,208 acres (the “Preliminary Development Area”). Winnebago Solar and Storage continues to analyze the optimal design layout within the Project Area, and the exact acres utilized will depend on final design. Areas are subject to applicable setbacks and public rights-of-way. A figure showing the Project Area and the Preliminary Development Area (i.e., Project footprint) is attached to this form as Figure 1.

B-2. Describe the anticipated point of electrical interconnection. Describe interconnection requests and the status of each request. Provide any assigned project or queue interconnection numbers.

The Project will interconnect at a new switchyard to be permitted, constructed, owned and operated by Northern States Power on the existing Northern States Power Huntley to Blue Earth 161 kV line in Faribault County, MN.

The Project has one interconnection request for the solar and storage facilities in the 2020 MISO Queue [REDACTED] for 150 MW of solar generation and 50 MW of energy storage. This interconnection request was part of MISO’s West DPP-2020 study group, which began in Q2 2020.

---

<sup>2</sup> At present, some land under lease or purchase option will not be utilized for the Project due to design considerations.

## PUBLIC DOCUMENT - NONPUBLIC DATA HAS BEEN EXCISED

In accordance with Minnesota Rules, part 7829.0500, Minn. Stat. Ch. 13 and the Commission's standard procedures, Winnebago Solar and Storage has designated as trade secret certain commercially-sensitive information, i.e., MISO queue information, which is considered confidential and proprietary trade secret information, provided to answer the questions posed in this form. Release of this data would have a detrimental effect on Winnebago Solar and Storage by providing potential competitors and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.

B-3. Provide a map showing the proposed facility boundary, the interconnection site, anticipated solar module layout, and associated facilities. "Associated facilities" includes access roads, operation and maintenance facilities, collector and feeder lines, and substations. Maps should be at 1:24,000 scale using an imagery basemap. The map must include a legend and scale bar.

The attached Figure 1 shows the Project Area, Preliminary Development Area footprint, and point of interconnection for the proposed solar project and associated storage component. While initial Project design and layout has been initiated, further revisions may occur as the Project advances towards filing.

### C. Project Characteristics

Provide the following information regarding each solar energy generating system:

C-1. List and describe the entity responsible for constructing the project.

Winnebago Solar and Storage will be responsible for constructing the Project. Winnebago Solar and Storage has not yet selected a construction contractor for the Project.

C-2. List and describe the entity responsible for operating and maintaining the project.

Winnebago Solar and Storage will be responsible for operating and maintaining the Project.

C-3. Describe the ownership structure, sales agreement(s), interconnection(s), revenue sharing, debt or equity financing, and any other characteristics of the solar energy generating system. Include a statement indicating whether these characteristics are "independent" or "shared." If shared, indicate with what existing or proposed project.

Winnebago Solar and Storage is an independent power producer that was formed to own, construct and operate the Project. Winnebago Solar and Storage is a Delaware limited liability company and wholly-owned indirect subsidiary of GlidePath Development LLC (GlidePath). Winnebago Solar and Storage will continue to own, operate and construct the Project after construction. The Project's solar and battery storage queue position includes only enough capacity to serve the Project. Accordingly, the Project will not share interconnection with any

other project. Winnebago Solar and Storage does not currently have or anticipate sharing revenue, debt or equity financing with any other project.

C-4. Provide the anticipated schedule for completion, including dates for permitting, construction (start and end dates), and commercial operation.

Winnebago Solar and Storage plans to file a Site Permit Application in the first quarter of 2022 so that it receives Commission approval for the Project in early 2023. Construction is anticipated to begin as early as spring of 2023 with commercial operation expected by the end of 2023 or early 2024.

**D. Applicant Information**

D-1. Provide the name, address, email, and telephone number of the applicant and any authorized representative.

Peter Rood, Chief Development Officer  
132 N. York Street, Suite 3L  
Elmhurst, IL 60126  
prood@glidepath.net  
651-583-5393

Jeremy Duehr  
Fredrikson & Byron, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402  
Direct: 612.492.7413  
jduehr@fredlaw.com

D-2. Provide the name, address, e-mail, and telephone number of the person or persons who would prepare the application to the Public Utilities Commission or to a Minnesota county or local unit of government, if such an application would be prepared by an agent or consultant of the applicant.

Joe Sedarski  
Westwood Professional Services, Inc.  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343  
Direct: 952.207.7631  
joe.sedarski@westwoodps.com

D-3. Briefly describe the applicant's business entity including its ownership and financial structure.

Winnebago Solar and Storage was formed for the purpose of developing this Project. Winnebago Solar and Storage is a Delaware limited liability company and wholly-owned indirect subsidiary of GlidePath Development LLC (GlidePath), a leading energy storage and renewable energy company based in Elmhurst, Illinois.

D-4. Provide the Minnesota Secretary of State organizational ID number for the applicant business entity, all subordinate entities, and all solar developer entities involved with the project.

Winnebago Solar and Storage's Minnesota Secretary of State organizational identification number is 1249205500047. Winnebago Solar and Storage does not have any subordinate entities. Winnebago Solar and Storage is solely owned by GlidePath Development LLC (GlidePath), the developer of the Project.

D-5. Identify and provide contact information for the person or persons who would be the permittees, if different than the applicant, if the solar energy generating systems were permitted by the Public Utilities Commission or a Minnesota county.

The permittee is Winnebago Solar Energy LLC, who is also the applicant.

Representatives:

Peter Rood, Chief Development Officer  
132 N. York Street, Suite 3L  
Elmhurst, IL 60126  
[prood@glidepath.net](mailto:prood@glidepath.net)  
651-583-5393

#### **E. Other Projects in Minnesota**

E-1. Identify any planned or existing solar energy generating system(s) in Minnesota in which the applicant, or a principal, partner, or affiliate of the applicant, has an ownership or other financial interest. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

While the applicant has several hybrid solar and storage projects under development across the country, it has no other solar energy projects currently under development in Minnesota.

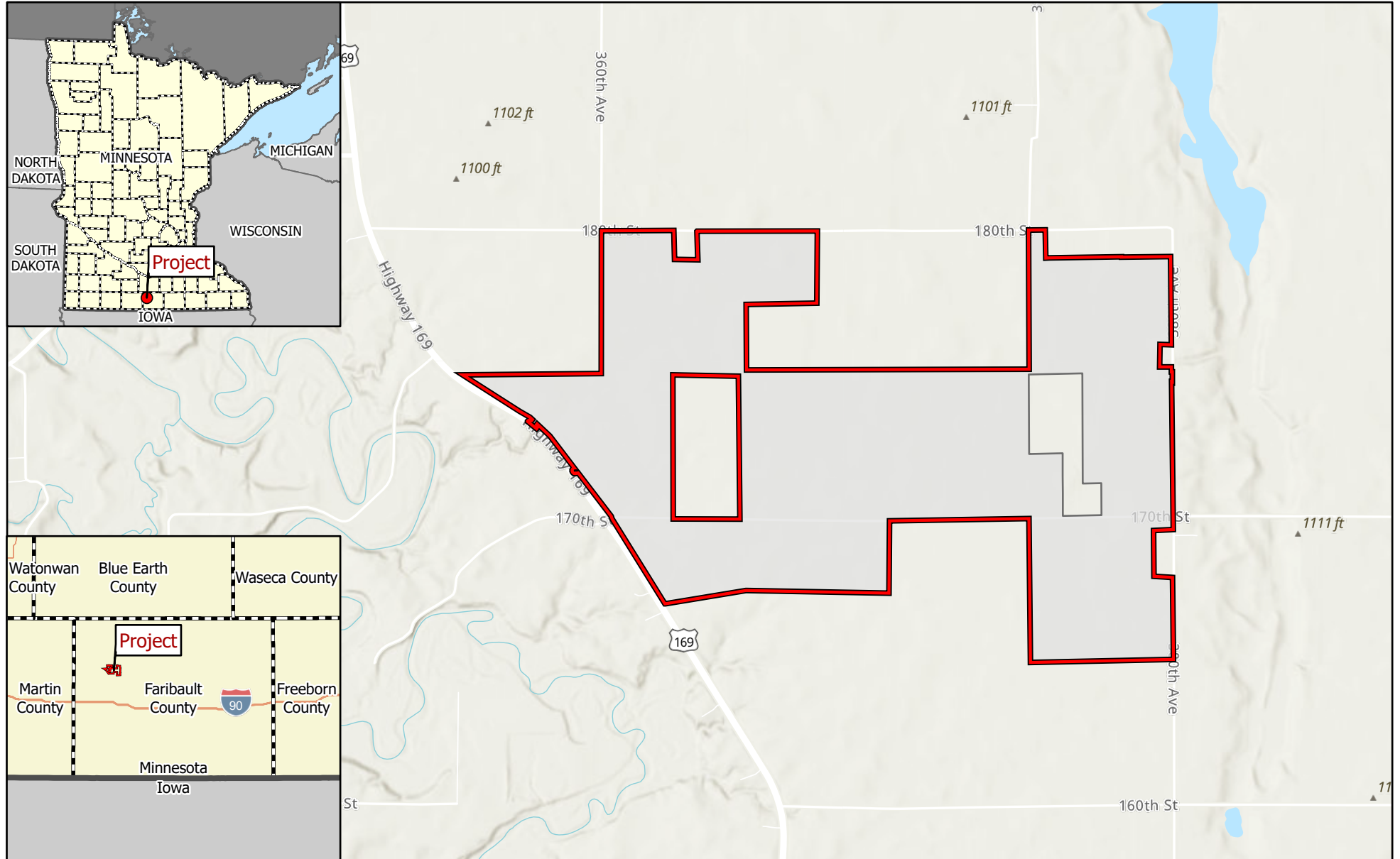
E-2. Identify any additional solar energy generating system(s) in Minnesota in which the applicant, or principal, partner, or affiliate of the applicant, has an ownership or other financial interest and is currently under construction or construction is planned to begin within 12 months of the proposed project(s) estimated completion date. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

None.

E-3. Identify any planned or existing solar energy generating system(s) in Minnesota which that shares any of the following with the proposed project: power purchase agreement, interconnection, sales, revenues, debt or equity financing, or other ownership or financial interests. Describe any facilities identified, including their location, alternating current nameplate capacity, and their interconnection requests.

None.

© 2022 Westwood Professional Services, Inc.



Data Source(s): Westwood (2022); ESRI WMS Topo Basemap (Accessed 2022).

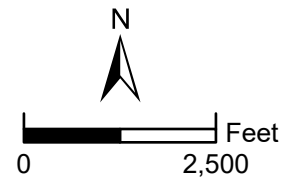
### Legend

- Project Area
- Preliminary Development Area

## Winnebago Solar and Storage Project

Faribault County, Minnesota

Project Location



**Westwood**

Toll Free (888) 937-5150 [westwoodps.com](http://westwoodps.com)  
Westwood Professional Services, Inc.

Figure 1

## **Appendix B-2**

Representative Project Introduction Letter – Federal,  
State, and Local Agencies

November 15, 2021

<Name and Address Block>

**Re: Request for Comments on Winnebago Solar and Storage Project**  
**Faribault County, Minnesota**  
File No R0027810.00

Dear <Name>:

On behalf of Winnebago Solar and Storage LLC (Winnebago), Westwood Professional Services, Inc. (Westwood) is gathering information and requesting agency comments for the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota (**Figure 1**). The purpose of this letter is to inform you of the proposed Project, request comments or questions from you regarding the Project, seek your input concerning permits or approvals that may be required, and identify other interests you may have in the Project Area (herein described) or surrounding vicinity.

The Project is located in portions of Sections 7 and 18, Township 103 North, Range 27 West (Prescott Township) and Sections 11, 12, and 13, Township 103 North, Range 28 West (Verona Township) in Faribault County, Minnesota (Project Area). The Project is east of and adjacent to US Highway 169 and south of the City of Winnebago. A map of the Project Area location and boundary is enclosed for your reference (**Figure 1**).

The Project Area is generally flat with rolling hills and consists of approximately 1,311 acres. Land use within the Project Area is currently row-crop agriculture with rural home sites bordering the Project on all sides. Areas surrounding the Project consist of row crop agriculture, wetlands, forested drainages, the Blue Earth River and US Highway 169 to the west and the City of Winnebago to the northwest.

The Project has a proposed nameplate energy generation capacity of up to 150 megawatts (MW) alternating current (AC), a 50 MW battery storage facility, and a short 161 kilovolt (kV) transmission line within the Project Area that will connect the Project to an existing transmission line that crosses through the Project boundary.

The Project's facilities will include:

- Solar modules and racking
- Solar inverters and associated transformers
- On-site electrical collection lines
- A Project substation, including a building housing safety and controls equipment
- A main power transformer to step up to transmission voltage
- Battery storage system, including battery modules in enclosures and associated safety and controls equipment
- Battery inverters and associated transformers



- An overhead transmission line (gen-tie)
- A utility switchyard
- Fencing
- Access roads
- An Operations and Maintenance (O&M) building
- Ancillary equipment and buildings as necessary

The proposed Project solar array layout, battery system layout, other facility locations, and engineering design/layout have not been finalized at this time. Foundations for the solar arrays will likely be driven steel piles, while the battery storage enclosures will be on concrete pads. Fencing will consist of an appropriately-sized fence material and equipped with security gates as needed. Gates will be secured with lock boxes.

Access will be controlled by the Project owner with access provided to local emergency response officials as needed. Access roads will be installed as necessary to allow access to Project facilities for O&M of the Project. Access road design typically includes stripping the surface vegetation root zone for the width of the road and placing compacted aggregate over the stabilized subgrade. Mechanical stabilization, such as geotextile reinforcement, may also be employed on top of compacted subgrade before aggregate placement.

The O&M building, Project substation, step-up transformer and switchyard are currently planned to be located near one another and located adjacent to the existing transmission line with which the Project will connect to the Xcel Energy (Xcel) transmission system (**Figure 1**). The switchyard (to be owned by Xcel) will be constructed to interconnect the Project to an existing transmission line (referred to as the point of interconnection, or POI). The electrical collection lines between the solar inverters, battery inverters, and the Project substation will be 34.5 kV and may be installed aboveground or direct buried in a trench at a reasonable and standard industry practice depth. Directional boring may be used to install collectors at some portions of the Project. A short 161 kV overhead electrical transmission (gen-tie) line will be installed between the Project substation and the switchyard.

Winnebago will seek a Certificate of Need (CN) and Site Permit (SP) from the Minnesota Public Utilities Commission (PUC) for the Project. The proposed transmission line for the Project will not require a Route Permit from the PUC because it does not exceed applicable rules that require PUC approval. However, transmission facilities will be included and described in the applications for the CN and SP. Winnebago plans to submit the CN and SP applications to the PUC in December 2021 or January 2022. Construction of the Project is anticipated to begin after issuance of the CN and SP, which would likely be during Spring/Summer 2023. Winnebago plans to construct the Project on a schedule that facilitates an in-service date in late 2023 or early 2024.

We welcome any comments your agency may have at this time and throughout the PUC CN and SP application processes. Please provide comments within 30 days of receipt of this letter. Any written comments provided in response to this letter will be incorporated into the PUC's review of the SP Application that will be submitted in late 2021 or early 2022.

If you require further information or have questions regarding this matter, please contact either Michelle Matthews, Senior Director of Development, Winnebago, at 612.590.8653/[mmathews@glidepath.net](mailto:mmathews@glidepath.net), or me at 612.214.6658/[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com).

Please contact me if you have any questions.

November 15, 2021  
Page 3

Sincerely,

WESTWOOD PROFESSIONAL SERVICES, INC.

A handwritten signature in blue ink, reading "Joe Sedarski", enclosed in a thin black rectangular border.

Joe Sedarski  
Senior Project Manager

Enc. Figure 1 Winnebago Solar and Storage Project Location



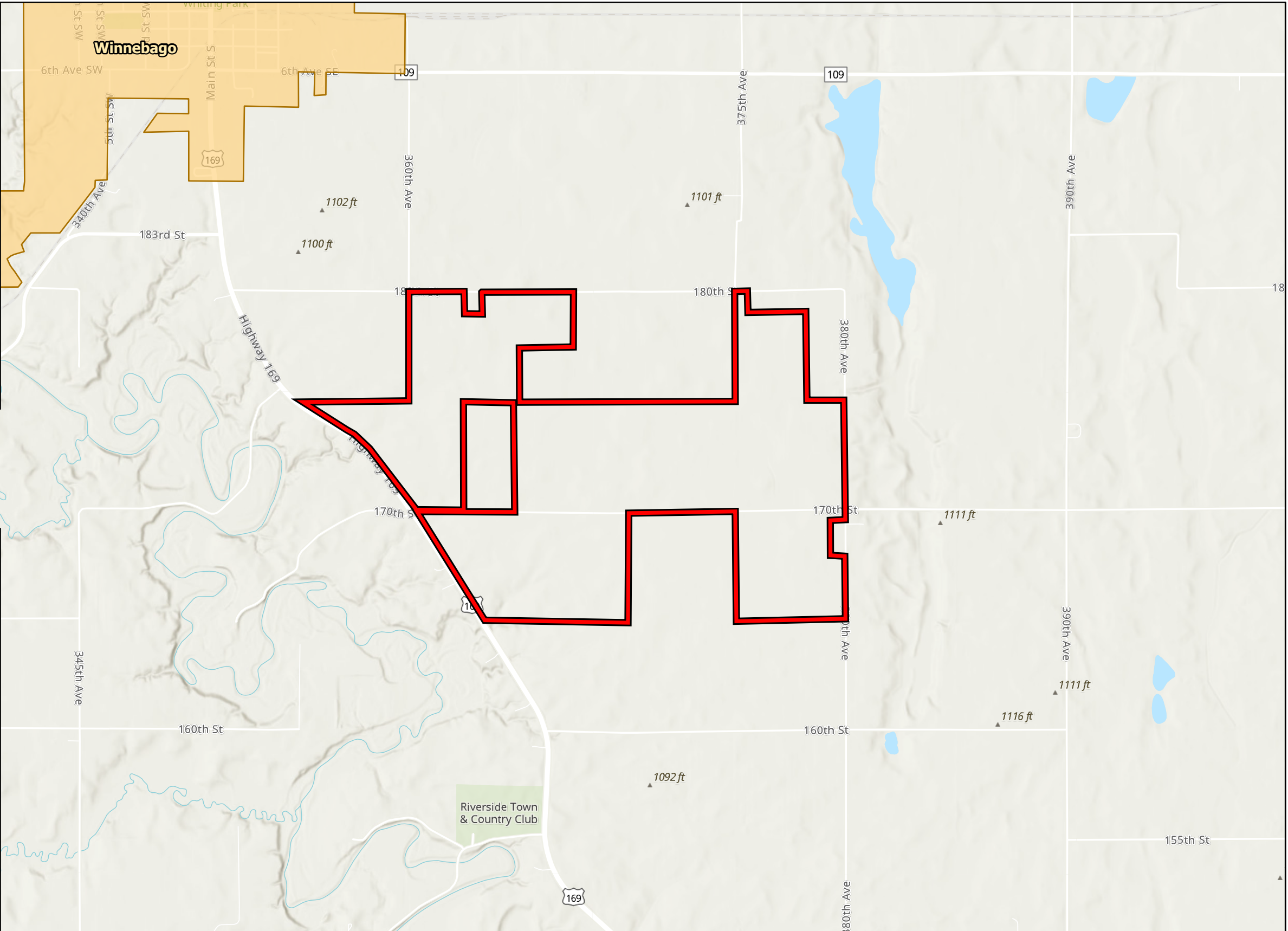
Data Source(s): Westwood (2021); ESRI WMS  
World Topographic & World Streets Basemaps  
(Accessed 2021); U.S. Census Bureau (2020).

## Legend

-  Project Area
-  County Boundary
-  Municipal Boundary
-  State Boundary

**Westwood**

Toll Free (888) 937-5150 westwoodps.com  
Westwood Professional Services, Inc.



## Winnebago Solar Energy Generation & Storage Project

Faribault County, Minnesota

Project Location  
November 2021

FIGURE 1

Agency Contact List

Name	Title	Agency1	Agency2	Address1	Address2	City	State	Zip	Email
<b>Federal</b>									
Raelene Hegge	Project Manager	U.S. Army Corps of Engineers	St. Paul District - Regulatory	180 5th Street East	Suite 700	St. Paul	MN	55101	<a href="mailto:Raelene.Hegge@usace.army.mil">Raelene.Hegge@usace.army.mil</a> <a href="mailto:USACE_Requests_MN@usace.army.mil">USACE_Requests_MN@usace.army.mil</a>
Sarah Quamme	Field Office Supervisor	U.S. Fish and Wildlife Service	Minnesota-Wisconsin Ecological Services Field	4101 American Boulevard East		Bloomington	MN	55425	<a href="mailto:TwinCities@fws.gov">TwinCities@fws.gov</a> <a href="mailto:Sarah_Quamme@fws.gov">Sarah_Quamme@fws.gov</a>
Dawn Marsh	Biologist	U.S. Fish and Wildlife Service	Minnesota-Wisconsin Field Office	4101 American Boulevard East		Bloomington	MN	55425	<a href="mailto:dawn_marsh@fws.gov">dawn_marsh@fws.gov</a>
Lindsay Butler	Manager	Federal Aviation Administration	Dakota / Minnesota Airports District (Minneapolis Office)	6020 28 <sup>th</sup> Ave S.	Suite 102	Minneapolis	MN	55450-2700	<a href="mailto:Linsday.butler@faa.gov">Linsday.butler@faa.gov</a>
<b>State</b>									
Sarah Beimers	Environmental Review Program	State Historic Preservation Office		203 Administration Building	50 Sherburne Avenue	St. Paul	MN	55155	<a href="mailto:Sarah.Beimers@state.mn.us">Sarah.Beimers@state.mn.us</a> <a href="mailto:MNSHPO@state.mn.us">MNSHPO@state.mn.us</a>
Cynthia Warzecha	Energy Projects Planner	Minnesota Department of Natural Resources		500 Lafayette Road		St. Paul	MN	55155	<a href="mailto:cynthia.warzecha@state.mn.us">cynthia.warzecha@state.mn.us</a>
Joanne Boettcher	Regional Environmental Assessment Ecologist	Minnesota Department of Natural Resources	Region 4 (South Region)	117 Rogers Street		Mankato	MN	56001	<a href="mailto:Joanne.Boettcher@state.mn.us">Joanne.Boettcher@state.mn.us</a>
Lisa Joyal	Endangered Species Review Coordinator	Minnesota Department of Natural Resources	Division of Ecological and Water Resources - Natural Heritage Information System (NHIS) Data Request	500 Lafayette Road	Box 25	St. Paul	MN	55155	<a href="mailto:lisa.joyal@state.mn.us">lisa.joyal@state.mn.us</a>
Stephan Roos	Environmental Planner	Minnesota Department of Agriculture	Ag Marketing and Development Division - Energy and Environment Section	625 Robert Street North		St. Paul		55155	<a href="mailto:Stephan.Roos@state.mn.us">Stephan.Roos@state.mn.us</a>
Stacy Kotch Egstad	Utility Routing and Siting Coordinator	Minnesota Department of Transportation	Office of Land Management	395 John Ireland Boulevard	MS 678	St. Paul	MN	55155	<a href="mailto:stacy.kotch@state.mn.us">stacy.kotch@state.mn.us</a>
Lisa Hughes	Business Development	Minnesota Department of Employment and Economic	Region 9 (South Central Region)	332 Minnesota Street	Suite E200	St. Paul	MN	55101	<a href="mailto:DEED.CustomerService@state.mn.us">DEED.CustomerService@state.mn.us</a> <a href="mailto:lisa.hughes@state.mn.us">lisa.hughes@state.mn.us</a>
Dan Card	Supervisor, Environmental Review Unit	Minnesota Pollution Control Agency		520 Lafayette Road		St. Paul	MN	55155	<a href="mailto:dan.card@state.mn.us">dan.card@state.mn.us</a>
Thomas Hogan	Director	Minnesota Department of Health	Environmental Health Division	625 Robert Street North		St. Paul	MN	55164-0975	<a href="mailto:health.review@state.mn.us">health.review@state.mn.us</a>
<b>County</b>									
John Roper	Chairman	Faribault County	Board of Commissioners	415 North Main Street	PO Box 130	Blue Earth	MN	56013	
Greg Young	Vice Chair	Faribault County	Board of Commissioners	415 North Main Street	PO Box 130	Blue Earth	MN	56013	
Bill Groskreutz	Commissioner	Faribault County	Board of Commissioners	415 North Main Street	PO Box 130	Blue Earth	MN	56013	
Tom Loveall	Commissioner	Faribault County	Board of Commissioners	415 North Main Street	PO Box 130	Blue Earth	MN	56013	

Bruce Anderson	Commissioner	Faribault County	Board of Commissioners	415 North Main Street	PO Box 130	Blue Earth	MN	56013	
Mark Daly	Public Works Director/Engineer	Faribault County	Public Works Department	727 E 5th Street	PO Box 325	Blue Earth	MN	56013	
Nate Carr	Conservation Technician	Faribault County SWCD		415 S Grove Street	Suite 9	Blue Earth	MN	56013	
County Attorney	County Attorney	Faribault County		125 W 2nd Street		Blue Earth	MN	56013	
Bryce Werner	Parks Manager	Faribault County	County Parks	727 E 5th Street	PO Box 325	Blue Earth	MN	56013	
Annie Leibel	Director	Faribault County	Economic Development Authority	415 S Grove Street	Suite 4	Blue Earth	MN	56013	<a href="mailto:annie.leibel@cedausa.com">annie.leibel@cedausa.com</a>
Brandee Douglas	GIS coordinator	Faribault County	GIS	415 S Grove Street	Suite8	Blue Earth	MN	56013	
Local									
Brian Millmann	Chair	Township of Prescott		13882 390th Ave		Blue Earth	MN	56013	<a href="mailto:millmann@bevcomm.net">millmann@bevcomm.net</a>
Neal Mensing	Chair	Township of Verona		14136 365th Ave		Blue Earth	MN	56013	<a href="mailto:farmx5@bevcomm.net">farmx5@bevcomm.net</a>
Scott Robertson	Mayor	City of Winnebago		140 Main Street South	PO Box 35	Winnebago	MN	56098	<a href="mailto:robson1@bevcomm.net">robson1@bevcomm.net</a>
Mandy Fletcher	Superintendent	Blue Earth Schools		315 East 6th Street		Blue Earth	MN	56013	<a href="mailto:mfletcher@beas.blueearth.k12.mn.us">mfletcher@beas.blueearth.k12.mn.us</a>

## **Appendix B-3**

Representative Project Introduction Letter – Tribal  
Representatives

VIA U.S. Mail and Email

November 15, 2021

<Name and Address Block>

**Re: Request for Comments on Winnebago Solar and Storage Project  
Faribault County, Minnesota  
File No R0027810.00**

Dear <Name>:

On behalf of Winnebago Solar and Storage LLC (Winnebago), Westwood Professional Services, Inc. (Westwood) is gathering information and requesting agency comments for the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota (**Figure 1**). The purpose of this letter is to inform you of the proposed Project, request comments or questions from you regarding the Project, seek your input concerning permits or approvals that may be required, and identify other interests you may have in the Project Area (herein described) or surrounding vicinity.

The Project is located in portions of Sections 7 and 18, Township 103 North, Range 27 West (Prescott Township) and Sections 11, 12, and 13, Township 103 North, Range 28 West (Verona Township) in Faribault County, Minnesota (Project Area). The Project is east of and adjacent to US Highway 169 and south of the City of Winnebago. A map of the Project Area location and boundary is enclosed for your reference (**Figure 1**).

The Project Area is generally flat with rolling hills and consists of approximately 1,311 acres. Land use within the Project Area is currently row-crop agriculture with rural home sites bordering the Project on all sides. Areas surrounding the Project consist of row crop agriculture, wetlands, forested drainages, the Blue Earth River and US Highway 169 to the west and the City of Winnebago to the northwest.

The Project has a proposed nameplate energy generation capacity of up to 150 megawatts (MW) alternating current (AC), a 50 MW battery storage facility, and a short 161 kilovolt (kV) transmission line within the Project Area that will connect the Project to an existing transmission line that crosses through the Project boundary.

The Project's facilities will include:

- Solar modules and racking
- Solar inverters and associated transformers
- On-site electrical collection lines
- A Project substation, including a building housing safety and controls equipment
- A main power transformer to step up to transmission voltage
- Battery storage system, including battery modules in enclosures and associated safety and controls equipment
- Battery inverters and associated transformers



- An overhead transmission line (gen-tie)
- A utility switchyard
- Fencing
- Access roads
- An Operations and Maintenance (O&M) building
- Ancillary equipment and buildings as necessary

The proposed Project solar array layout, battery system layout, other facility locations, and engineering design/layout have not been finalized at this time. Foundations for the solar arrays will likely be driven steel piles, while the battery storage enclosures will be on concrete pads. Fencing will consist of an appropriately-sized fence material and equipped with security gates as needed. Gates will be secured with lock boxes.

Access will be controlled by the Project owner with access provided to local emergency response officials as needed. Access roads will be installed as necessary to allow access to Project facilities for O&M of the Project. Access road design typically includes stripping the surface vegetation root zone for the width of the road and placing compacted aggregate over the stabilized subgrade. Mechanical stabilization, such as geotextile reinforcement, may also be employed on top of compacted subgrade before aggregate placement.

The O&M building, Project substation, step-up transformer and switchyard are currently planned to be located near one another and located adjacent to the existing transmission line with which the Project will connect to the Xcel Energy (Xcel) transmission system (**Figure 1**). The switchyard (to be owned by Xcel) will be constructed to interconnect the Project to an existing transmission line (referred to as the point of interconnection, or POI). The electrical collection lines between the solar inverters, battery inverters, and the Project substation will be 34.5 kV and may be installed aboveground or direct buried in a trench at a reasonable and standard industry practice depth. Directional boring may be used to install collectors at some portions of the Project. A short 161 kV overhead electrical transmission (gen-tie) line will be installed between the Project substation and the switchyard.

Winnebago will seek a Certificate of Need (CN) and Site Permit (SP) from the Minnesota Public Utilities Commission (PUC) for the Project. The proposed transmission line for the Project will not require a Route Permit from the PUC because it does not exceed applicable rules that require PUC approval. However, transmission facilities will be included and described in the applications for the CN and SP. Winnebago plans to submit the CN and SP applications to the PUC in December 2021 or January 2022. Construction of the Project is anticipated to begin after issuance of the CN and SP, which would likely be during Spring/Summer 2023. Winnebago plans to construct the Project on a schedule that facilitates an in-service date in late 2023 or early 2024.

We welcome any comments your agency may have at this time and throughout the PUC CN and SP application processes. Please provide comments within 30 days of receipt of this letter. Any written comments provided in response to this letter will be incorporated into the PUC's review of the SP Application that will be submitted in late 2021 or early 2022.

If you require further information or have questions regarding this matter, please contact either Michelle Matthews, Senior Director of Development, Winnebago, at 612.590.8653/[mmathews@glidepath.net](mailto:mmathews@glidepath.net), or me at 612.214.6658/[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com).

Please contact me if you have any questions.



November 15, 2021  
Page 3

Sincerely,

WESTWOOD PROFESSIONAL SERVICES, INC.

A handwritten signature in blue ink, reading "Joe Sedarski", enclosed in a thin black rectangular border.

Joe Sedarski  
Senior Project Manager

Enc. Figure 1 Winnebago Solar and Storage Project Location



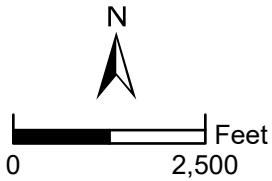
Data Source(s): Westwood (2021); ESRI WMS  
World Topographic & World Streets Basemaps  
(Accessed 2021); U.S. Census Bureau (2020).

### Legend

- Project Area
- County Boundary
- Municipal Boundary
- State Boundary

**Westwood**

Toll Free (888) 937-5150 westwoodps.com  
Westwood Professional Services, Inc.



## Winnebago Solar Energy Generation & Storage Project

Faribault County, Minnesota

Project Location  
November 2021

FIGURE 1

VIA U.S. Mail and Email

May 25, 2022

<Name and Address Block>

**Re: Second Request for Comment on Winnebago Solar and Storage Project  
Faribault County, Minnesota  
File No R0027810.00**

Dear <Name>:

On behalf of Winnebago Solar and Storage LLC (Winnebago), Westwood Professional Services, Inc. (Westwood) is gathering information and requesting agency comments for the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota (**Figure 1**). The purpose of this letter is to update you on the Project, seek your input concerning permits or approvals that may be required, and identify other interests you may have in the Project Area (herein described) or surrounding vicinity.

As a reminder, the Project is located in portions of Sections 7 and 18, Township 103 North, Range 27 West (Prescott Township) and Sections 11, 12, and 13, Township 103 North, Range 28 West (Verona Township) in Faribault County, Minnesota (Project Area). The Project is east of and adjacent to US Highway 169 and south of the City of Winnebago. The area has shifted slightly since the time of the initial November 2021 letter we sent you. An updated map of the Project Area location and boundary is enclosed for your reference (**Figure 1**).

The Project Area is generally flat with rolling hills and consists of approximately 1,255 acres. Land use within the Project Area is currently row-crop agriculture with rural home sites bordering the Project on all sides. Areas surrounding the Project consist of row crop agriculture, wetlands, forested drainages, the Blue Earth River and US Highway 169 to the west and the City of Winnebago to the northwest.

The Project has a proposed nameplate energy generation capacity of up to 150 megawatts (MW) alternating current (AC), a 50 MW battery storage facility, and a short 161 kilovolt (kV) transmission line within the Project Area that will connect the Project to an existing transmission line that crosses through the Project boundary.

Since our initial outreach letter sent to you in November 2021, a Phase I archaeological pedestrian survey was conducted. No archaeological resources were identified within the Project Area by Westwood archaeologists during the Phase I Survey and no further work is recommended for the Project at this time. This report will be updated once spring 2022 fieldwork has been completed for un-surveyed areas. Additionally, a Unanticipated Discovery Plan for Cultural Resources has been prepared and will be part of Project permitting documents.

We welcome any comments you may have at this time and throughout the PUC CN and SP application processes. Please provide comments within 30 days of receipt of this letter. Any written comments provided in response to this letter will be incorporated into the PUC's review of the SP Application that we estimate will be submitted in the second quarter 2022.

If you require further information or have questions regarding this matter, please contact either Peter Rood, Chief Development Officer, Winnebago, at 651.494.4939/[prood@glidepath.net](mailto:prood@glidepath.net), or me at 317.453.1416/[annabel.sammons@westwoodps.com](mailto:annabel.sammons@westwoodps.com). We appreciate your consideration of this Project.

Sincerely,

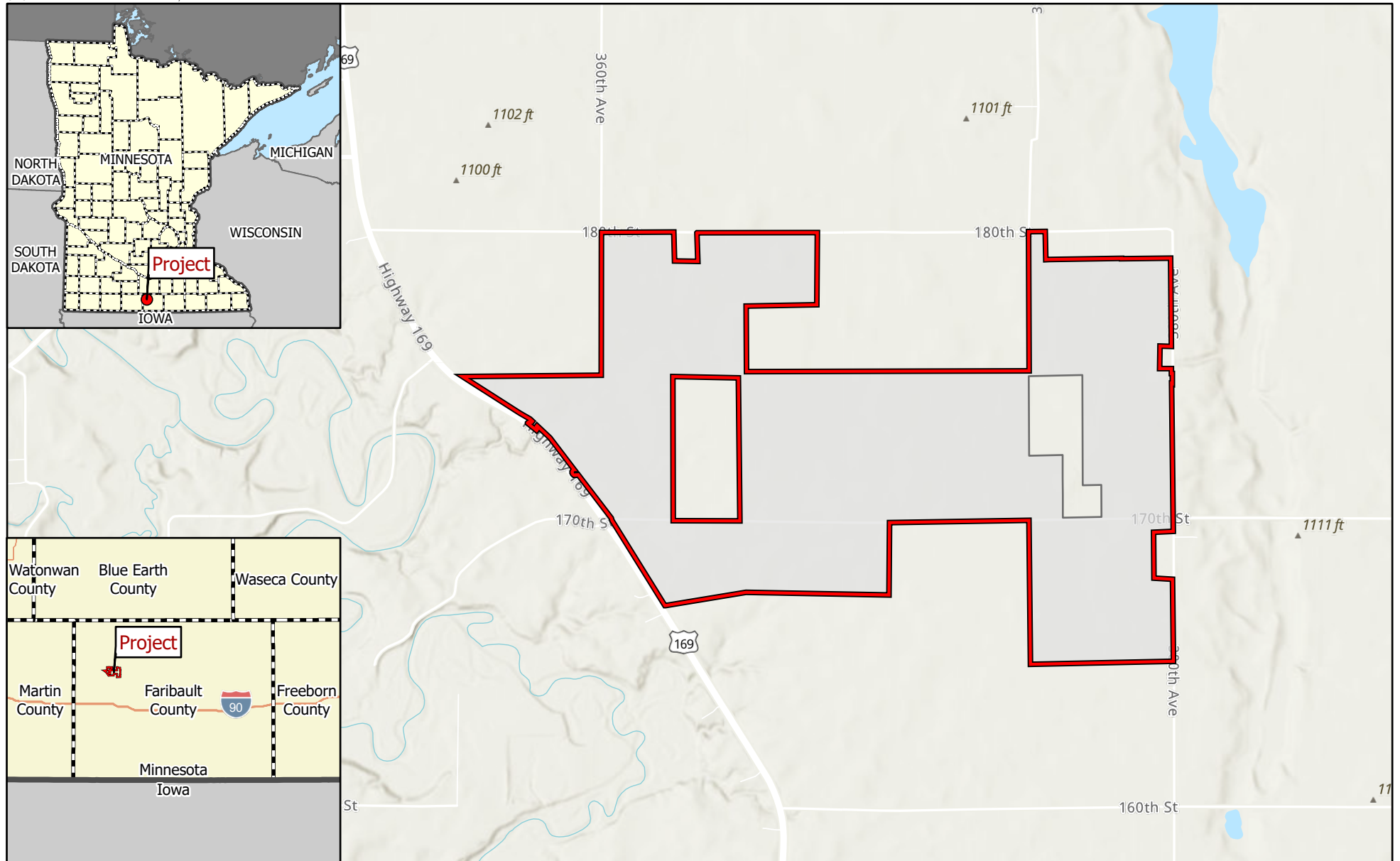
WESTWOOD PROFESSIONAL SERVICES, INC.

*Annabel Sammons*

Annabel Sammons  
Environmental Scientist

Enc. Figure 1 Project Area Boundary and Location

© 2022 Westwood Professional Services, Inc.



Data Source(s): Westwood (2022); ESRI WMS Topo Basemap (Accessed 2022).

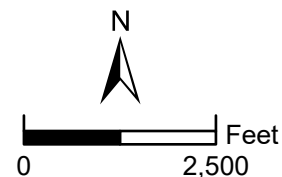
### Legend

- Project Area
- Preliminary Development Area

## Winnebago Solar and Storage Project

Faribault County, Minnesota

Project Location



**Westwood**

Toll Free (888) 937-5150 [westwoodps.com](http://westwoodps.com)  
Westwood Professional Services, Inc.

Figure 1

Tribal Representative Contact List									
Name	Title	Tribal Nation	Department	Address1	Address2	City	State	Zip Code	Email
Cheyenne St. John	THPO	Lower Sioux Indian Community	Tribal Historic Preservation Office	39527 Highway 1		Morton	MN	56270	<a href="mailto:Cheyanne.stjohn@lowersioux.com">Cheyanne.stjohn@lowersioux.com</a>
Samantha Odegard	THPO Assistant	Upper Sioux Community	Tribal Historic Preservation Office	PO Box 147		Granite Falls	MN	56241	<a href="mailto:samanthao@uppersiouxcommunity-nsn.gov">samanthao@uppersiouxcommunity-nsn.gov</a>
Noah White	THPO	Prairie Island Indian Community	Tribal Historic Preservation Office	5636 Sturgeon Lake Road		Welch	MN	55089	<a href="mailto:noah.white@piic.org">noah.white@piic.org</a>
Leonard Wabasha	Director of Cultural Resources	Shakopee Mdewakanton Sioux Community		2330 Sioux Trail NW		Prior Lake	MN	55372	<a href="mailto:culturalresources@shakopeedakota.org">culturalresources@shakopeedakota.org</a> <a href="mailto:leonard.wabasha@shakopeedakota.org">leonard.wabasha@shakopeedakota.org</a>
Jaylen Strong	THPO	Bois Forte Band of Chippewa	Tribal Historic Preservation Office	5344 Lake Shore Drive	PO Box 16	Nett Lake	MN	55772	<a href="mailto:jaylen.strong@boisforte-nsn.gov">jaylen.strong@boisforte-nsn.gov</a>
Jill Hoppe	THPO	Fond du Lac Band of Lake Superior Chippewa Indians	Tribal Historic Preservation Office	1720 Big Lake Road		Cloquet	MN	55720	<a href="mailto:jillhoppe@fdlrez.com">jillhoppe@fdlrez.com</a>
Wayne DuPuis		Fond du Lac Band of Lake Superior Chippewa Indians	Tribal Historic Preservation Office	1720 Big Lake Road		Cloquet	MN	55720	<a href="mailto:WayneDupuis@fdlrez.com">WayneDupuis@fdlrez.com</a>
Mary Ann Gagnon	THPO	Grand Portage Band of Lake Superior Chippewa	Tribal Historic Preservation Office	PO Box 428		Grand Portage	MN	55605	<a href="mailto:maryanng@grandportage.com">maryanng@grandportage.com</a>
Amy Burnette	THPO	Leech Lake Band of Ojibwe	Tribal Historic Preservation Office	115 6 <sup>th</sup> Street NW	Suite E	Cass Lake	MN	56633	<a href="mailto:amy.burnette@llojibwe.net">amy.burnette@llojibwe.net</a>
Terry Kemper	THPO	Mille Lacs Band of Ojibwe Indians	Tribal Historic Preservation Office	43408 Oodena Drive		Onamia	MN	56349	<a href="mailto:terry.kemper@millelacsband.com">terry.kemper@millelacsband.com</a>
Kade Ferris	THPO/Tribal Archaeologist	Red Lake Nation		PO Box 274		Red Lake	MN	56671	<a href="mailto:kade.ferris@redlakenation.org">kade.ferris@redlakenation.org</a>
Jaime Arsenault	THPO	White Earth Nation	Tribal Historic Preservation Office	PO Box 418		White Earth	MN	56591	<a href="mailto:Jaime.arsenault@whiteearth-nsn.gov">Jaime.arsenault@whiteearth-nsn.gov</a>
Monica Hedstrom	Environmental Director	White Earth Nation	Tribal Historic Preservation Office	PO Box 418		White Earth	MN	56591	<a href="mailto:Monica.Hedstrom@whiteearth-nsn.gov">Monica.Hedstrom@whiteearth-nsn.gov</a>
Melissa Cerda	Cultural Resources Specialist	Minnesota Indian Affairs Council		161 St. Anthony Avenue	Suite 919	St. Paul	MN	55103	<a href="mailto:Melissa.cerda@state.mn.us">Melissa.cerda@state.mn.us</a>

## **Appendix B-4**

### **Agency and Tribal Responses**

**From:** [Joe Sedarski](#)  
**To:** [Boettcher, Joanne \(DNR\)](#); [Warzecha, Cynthia \(DNR\)](#); [Marsh, Dawn S](#)  
**Cc:** [Michelle Matthews](#); [Annabel Sammons](#)  
**Subject:** Winnebago Solar Energy Project - Informal Natural Resource Review Request  
**Date:** Thursday, November 11, 2021 10:30:13 AM  
**Attachments:** [Winnebago IPaC\\_210729.pdf](#)  
[Winnebago ProjectBoundary\\_210805.zip](#)

---

Good morning Joanne, Cynthia and Dawn,

As a requested follow up to the Winnebago Solar and Storage Project (Project) meeting we held with you on September 28, 2021, we are sending you the shapefiles for the Project Area along with a copy of the USFWS IPaC (dated July 29, 2021). Please use this information as needed for your initial review of the Project at this time.

Note we will also be making a formal request to the MnDNR (Lisa Joyal) for a Natural Heritage Review (NHR) review for the Project this week as well.

Should you have any questions or comments at this time, please let us know. We appreciate your review and assistance with this Project!

Best Regards,  
Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631  
**main** (952) 937-5150  
**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

**[westwoodps.com](http://westwoodps.com)**

**(888) 937-5150**





## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Minnesota-Wisconsin Ecological Services Field Office  
4101 American Blvd E  
Bloomington, MN 55425-1665  
Phone: (952) 252-0092 Fax: (952) 646-2873  
<http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html>



In Reply Refer To:

July 29, 2021

Consultation Code: 03E19000-2021-SLI-1943

Event Code: 03E19000-2021-E-05880

Project Name: Winnebago Solar Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

### Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the ECOS IPaC website at regular intervals during project planning and implementation

for updates to species lists and information. An updated list may be requested through the ECOS IPaC system by completing the same process used to receive the enclosed list.

### Consultation Technical Assistance

Please refer to the Midwest Region [S7 Technical Assistance](#) website for step-by-step instructions for making species determinations and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

### Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example ["No Effect" document](#) also can be found on the S7 Technical Assistance website.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) through the S7 Technical Assistance website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **No Effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example ["No Effect" document](#) also can be found on the S7 Technical Assistance website.
3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

### Northern Long-Eared Bats

---

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

This species hibernates in caves or mines only during the winter. In Minnesota and Wisconsin, the hibernation season is considered to be November 1 to March 31. During the active season (April 1 to October 31) they roost in forest and woodland habitats. Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected.

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A stand of eastern red cedar shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
  - Any activity in or near the entrance to a cave or mine,
  - Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
  - Construction of one or more wind turbines, or
-

- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

*If none of the above activities are proposed*, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example ["No Effect" document](#) also can be found on the S7 Technical Assistance website.

*If any of the above activities are proposed*, please use the northern long-eared bat determination key in IPaC. This tool streamlines consultation under the 2016 rangewide programmatic biological opinion for the 4(d) rule. The key helps to determine if prohibited take might occur and, if not, will generate an automated verification letter. No further review by us is necessary. Please visit the links below for additional information about "may affect" determinations for the northern long-eared bat.

[NLEB Section 7 consultation](#)

[Key to the NLEB 4\(d\) rule for federal actions that may affect](#)

[Instructions for the NLEB 4\(d\) assisted d-key](#)

[Maternity tree and hibernaculum locations by state](#)

### **Other Trust Resources and Activities**

*Bald and Golden Eagles* - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. Should bald or golden eagles occur within or near the project area please contact our office for further coordination. For communication and wind energy projects, please refer to additional guidelines below.

*Migratory Birds* - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of recommendations that minimize potential impacts to migratory birds. Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

---

*Communication Towers* - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

*Transmission Lines* - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

*Wind Energy* - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

## **State Department of Natural Resources Coordination**

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.

### *Minnesota*

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: [Review.NHIS@state.mn.us](mailto:Review.NHIS@state.mn.us)

### *Wisconsin*

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: [DNRERReview@wi.gov](mailto:DNRERReview@wi.gov)

---

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- Migratory Birds

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Minnesota-Wisconsin Ecological Services Field Office**

4101 American Blvd E

Bloomington, MN 55425-1665

(952) 252-0092

---

## Project Summary

Consultation Code: 03E19000-2021-SLI-1943

Event Code: 03E19000-2021-E-05880

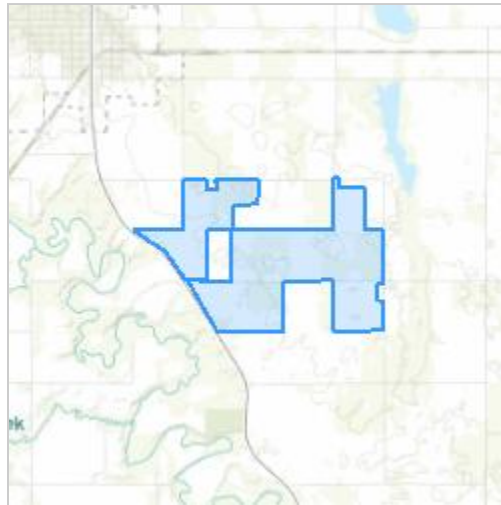
Project Name: Winnebago Solar Project

Project Type: POWER GENERATION

Project Description: Utility-scale solar project

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.7350872,-94.12306044628019,14z>



Counties: Faribault County, Minnesota

---



## Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

---

## Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<b>American Bittern <i>Botaurus lentiginosus</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/6582">https://ecos.fws.gov/ecp/species/6582</a>	Breeds Apr 1 to Aug 31
<b>Bald Eagle <i>Haliaeetus leucocephalus</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Dec 1 to Aug 31

---

NAME	BREEDING SEASON
<b>Black Tern <i>Chlidonias niger</i></b> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/3093">https://ecos.fws.gov/ecp/species/3093</a>	Breeds May 15 to Aug 20
<b>Bobolink <i>Dolichonyx oryzivorus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Jul 31
<b>Franklin's Gull <i>Leucophaeus pipixcan</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
<b>Lesser Yellowlegs <i>Tringa flavipes</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9679">https://ecos.fws.gov/ecp/species/9679</a>	Breeds elsewhere
<b>Long-eared Owl <i>asio otus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/3631">https://ecos.fws.gov/ecp/species/3631</a>	Breeds Mar 1 to Jul 15
<b>Nelson's Sparrow <i>Ammodramus nelsoni</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Sep 5
<b>Red-headed Woodpecker <i>Melanerpes erythrocephalus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
<b>Semipalmated Sandpiper <i>Calidris pusilla</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere

## Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see

below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

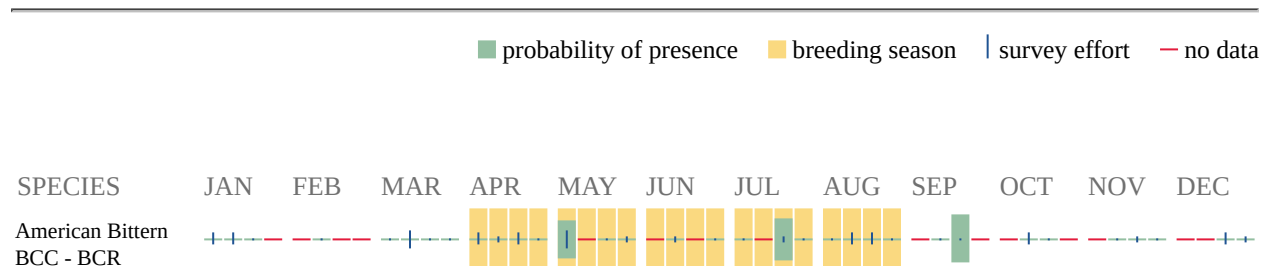
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

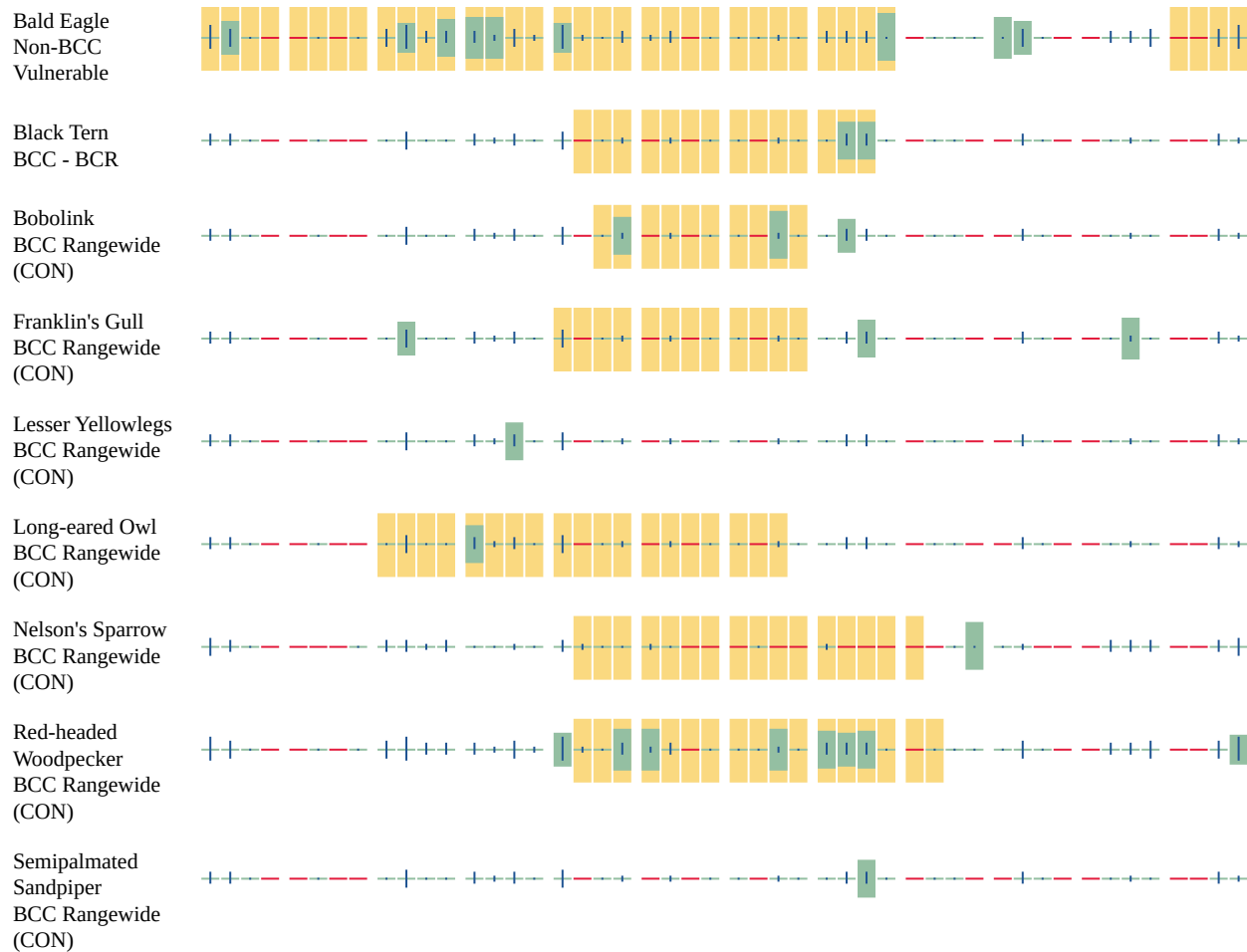
### No Data (—)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

## Migratory Birds FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding

in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

### **What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

### **What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### **How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
-

2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

---



**From:** [Marsh, Dawn S](#)  
**To:** [Joe Sedarski](#); [Boettcher, Joanne \(DNR\)](#); [Warzecha, Cynthia \(DNR\)](#)  
**Cc:** [Michelle Matthews](#); [Annabel Sammons](#)  
**Subject:** Re: [EXTERNAL] Winnebago Solar Energy Project - Informal Natural Resource Review Request  
**Date:** Monday, November 29, 2021 12:00:22 PM

---

Good morning,

Thank you for the opportunity to comment on the proposed Winnebago Solar Energy site location and project in Faribault County, Minnesota. The U.S. Fish and Wildlife Service (Service) provides comments on the proposed location described in your email dated November 11, 2021. Because the proposed project could impact federal trust resources, we are providing the following comments pursuant to the Endangered Species Act (ESA) and the Bald and Golden Eagle Protection Act to help inform project planning and development.

The Service provides the following specific comments for species that could occur in the proposed project area.

#### Impacts to Listed Species

##### **Northern Long-eared Bat** (*Myotis septentrionalis*, Threatened)

The Northern long-eared bat (NLEB) has the potential to occur in Faribault County and may occur within the proposed project boundary. The Service currently does not have any documented records of NLEB within the vicinity of the project, and there are no known records of hibernaculum within Faribault County. Suitable habitat exists for NLEB adjacent to the project area and the Service recommends a 1,000-foot setback from wooded areas where NLEB may be foraging. This minimization measure will also benefit other bat species.

#### Impacts to Eagles

Bald eagles, golden eagles, and their nests are protected under the Eagle Act. The Eagle Act prohibits, except when authorized by a permit, the taking of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “...to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

Our [National Bald Eagle Management Guidelines](#) are intended to help people protect eagle nests and avoid “disturbance” of eagles as required by the Eagle Act. We have also developed guidance to help determine if you may need an [incidental take permit for bald eagles](#) if disturbance cannot be avoided. If your project may impact a bald eagle nest, or you anticipate that you will be unable to avoid disturbing bald eagles, please contact us regarding the Eagle Act permit process.

#### Site Selection and Layout Recommendations:

1. Select a site with the least wildlife value practicable. Sites such as vehicle parking areas (using elevated solar panels), commercial roof tops, brownfields, industrial developments, or municipal solid waste landfills may provide adequate space for a solar development and have no impact to existing wildlife habitat. Additionally, developing solar with compatible forms of agriculture (e.g., “dual-use farming”) may allow for continued crop production or grazing by using elevated solar panels and minimize the potential for additional loss of wildlife habitat.

2. If low wildlife value sites are not feasible, we suggest avoiding or minimizing to the greatest degree the conversion of forested areas, native grasslands, and wetlands. These areas provide important habitat for a variety of species and help protect water quality.
3. Plan the site to help ensure bat habitat is adequately protected by minimizing the removal of forested habitat and protecting forested hedgerows or other forested corridors connecting areas of suitable bat habitat.
4. Identify bald eagle nests that are within or near the project site to help inform project layout. Bald eagle nests are large (4-6 feet in diameter and 3 feet deep, on average) and therefore noticeable, especially when in deciduous trees after leaf drop.
5. Plan the site to provide habitat for pollinators. Many pollinators are declining, including species that pollinate key agricultural crops and help maintain natural plant communities. Planting a diverse group of native plants around and under solar panels will help support the nutritional needs of Minnesota's pollinators. We recommend a mix of flowering trees, shrubs, and herbaceous plants so that something is always in bloom and pollen is available during the active periods of pollinators (mid-March to mid-October).
6. Incorporate a water source (e.g., ephemeral pool or low area) to provide additional resources for pollinators and bats.

*Project Construction Recommendations:*

1. When removing potential wildlife habitat is necessary, avoid spring and summer (March 15-August 15) when feasible to help prevent the loss of nests, non-mobile young, and help wildlife populations maintain productivity.
2. Consider voluntary mitigation in addition to any required mitigation to offset the loss of forested areas, wetlands, or native grasslands.
3. Use construction techniques and materials (wildlife friendly erosion control materials) that are not likely to cause additional harm to wildlife.
4. Implement measures to reduce the chances that equipment will exacerbate the spread of invasive species into natural habitats (e.g., cleaning equipment prior to accessing the site, post-site restoration monitoring, and invasive plant treatments, as necessary).
5. Any above ground electrical transmission lines or other equipment should follow the [Avian Power Line Interaction Committee guidelines](#) for minimizing avian electrocution and collision risk.

Thank you for the opportunity to comment on the proposed Winnebago Solar Energy Project. Should you have any questions or concerns, or if the status of any species that may be present in the project area changes, please do not hesitate to contact me

Thank you,  
Dawn

---

Dawn Marsh (she/her/hers) | Fish and Wildlife Biologist  
U.S. Fish & Wildlife Service | Minnesota-Wisconsin Field Office  
4101 American Blvd. E., Bloomington, MN 55425  
Tel: (952) 252-0092 x 202\*  
\*Teleworking - please email to schedule a call

---

**From:** Joe Sedarski <Joe.Sedarski@westwoodps.com>  
**Sent:** Thursday, November 11, 2021 9:30 AM  
**To:** Boettcher, Joanne (DNR) <Joanne.Boettcher@state.mn.us>; Warzecha, Cynthia (DNR)

<cynthia.warzecha@state.mn.us>; Marsh, Dawn S <dawn\_marsh@fws.gov>

**Cc:** Michelle Matthews <mmatthews@glidepath.net>; Annabel Sammons

<Annabel.Sammons@westwoodps.com>

**Subject:** [EXTERNAL] Winnebago Solar Energy Project - Informal Natural Resource Review Request

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Good morning Joanne, Cynthia and Dawn,

As a requested follow up to the Winnebago Solar and Storage Project (Project) meeting we held with you on September 28, 2021, we are sending you the shapefiles for the Project Area along with a copy of the USFWS IPaC (dated July 29, 2021). Please use this information as needed for your initial review of the Project at this time.

Note we will also be making a formal request to the MnDNR (Lisa Joyal) for a Natural Heritage Review (NHR) review for the Project this week as well.

Should you have any questions or comments at this time, please let us know. We appreciate your review and assistance with this Project!

Best Regards,

Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631

**main** (952) 937-5150

**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300

Minnetonka, MN 55343

[westwoodps.com](http://westwoodps.com)

(888) 937-5150

**From:** [Joe Sedarski](#)  
**To:** [Hegge, Raelene J CIV USARMY CEMVP \(USA\)](#)  
**Cc:** [Michelle Matthews](#); [Annabel Sammons](#); [Bobby Cress](#); [Shannon Hansen](#)  
**Subject:** RE: 2021-02454-RMH 20211203 PREAPP .pdf  
**Date:** Monday, December 6, 2021 9:37:03 AM  
**Attachments:** [2021-02454-RMH 20211203 PREAPP .pdf](#)  
[image001.png](#)

---

Good morning Ms. Hegge – thank you for your review and comment at this stage of the Winnebago Solar and Storage Project. We'll review your letter and get back to you with any questions.

Also, thanks for the update paperless communication procedures for MN and WI projects and working with the USACE – greatly appreciated.

Best,  
Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631  
**main** (952) 937-5150  
**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

[westwoodps.com](http://westwoodps.com)

(888) 937-5150

---

**From:** Hegge, Raelene J CIV USARMY CEMVP (USA) <Raelene.Hegge@usace.army.mil>  
**Sent:** Saturday, December 4, 2021 8:12 AM  
**To:** Joe Sedarski <joe.sedarski@westwoodps.com>  
**Subject:** 2021-02454-RMH 20211203 PREAPP .pdf

Hello,

Attached please find the subject document. A hard copy will not be sent. If you wish to receive a hard copy of this letter please respond to this email. If you have any other questions, please contact the project manager indicated in the letter.

Information on Corps of Engineers Regulatory Program status during the COVID-19 pandemic can be found at: <https://www.mvp.usace.army.mil/missions/regulatory>

We are pleased to introduce our new paperless communication procedures in Minnesota & Wisconsin. Requests for action (pre-application consultations, permit applications, requests for delineation concurrences, requests for jurisdictional determinations, and mitigation bank proposals) should be sent directly to the following email: (in MN) [usace\\_requests\\_mn@usace.army.mil](mailto:usace_requests_mn@usace.army.mil) (in WI) [usace\\_requests\\_wi@usace.army.mil](mailto:usace_requests_wi@usace.army.mil). Please include the county name in the subject line of the email (e.g. Washington County). These changes will improve efficiency, reduce costs and reduce the environmental footprint. Additional information can be found in our public notice located here: <http://www.mvp.usace.army.mil/Missions/Regulatory.aspx>

Thank you.

Raelene Hegge  
USACE Regulatory Specialist  
St. Paul District Office  
180 5th Street E  
St. Paul, Minnesota 55101  
(651) 290-5355  
[Raelene.Hegge@usace.army.mil](mailto:Raelene.Hegge@usace.army.mil)



**DEPARTMENT OF THE ARMY**  
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT  
180 FIFTH STREET EAST, SUITE 700  
ST. PAUL, MN 55101-1678

December 3, 2021

Regulatory File No. MVP-2021-02454-RMH

Westwood Professional Services, Inc.  
c/o: Joe Sedarski  
[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Dear Joe Sedarski:

This letter is in response to correspondence we received regarding the Winnebago Solar and Storage Project proposed by Winnebago Solar and Storage Project, LLC. The project site is located in Sections 7 and 8, Township 103 North, Range 27 West and Sections 11-13, Township 103 North, Range 28 West in Faribault County, Minnesota.

Without detailed plans, we cannot provide specific comments regarding the effects the proposed activity would have on jurisdictional waters of the United States or whether a Department of the Army Permit would be required. In lieu of a specific response, please consider the following general information concerning our regulatory program that may apply to the proposed project.

If the proposal involves activity in navigable waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 (Section 10). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit.

If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (CWA Section 404). Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps evaluation of a Section 10 and/or a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

If the proposal requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental

Regulatory Branch (File No. MVP-2021-02454-RMH)

consequences" (40 CFR § 230.10(a)). Time and money spent on the proposal prior to applying for a Section 404 permit cannot be factored into the Corps' decision whether there is a less damaging practicable alternative to the proposal.

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

If you have any questions, please contact Raelene Hegge in our St. Paul office at (651) 290-5355 or [Raelene.Hegge@usace.army.mil](mailto:Raelene.Hegge@usace.army.mil). In any correspondence or inquiries, please refer to the Regulatory file number shown above.

Sincerely,

Raelene Hegge  
Regulatory Specialist

**From:** [Joe Sedarski](#)  
**To:** [Kotch Egstad, Stacy \(DOT\)](#); [mmathews@glidepath.net](mailto:mmathews@glidepath.net)  
**Cc:** [Annabel Sammons](#); [Duehr, Jeremy](#); [John Sotirin](#)  
**Subject:** RE: MnDOT Preliminary Comments - Winnebago Solar  
**Date:** Monday, December 13, 2021 10:13:15 AM  
**Attachments:** [image001.png](#)

---

Good morning Ms. Kotch Egstad –

Thanks for reviewing the Winnebago Solar and Storage Project information we sent you and the responses below. We'll be in touch with any questions as the Project moves forward.

Best,  
Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631  
**main** (952) 937-5150  
**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

[westwoodps.com](http://westwoodps.com)

(888) 937-5150

---

**From:** Kotch Egstad, Stacy (DOT) <[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)>  
**Sent:** Monday, December 13, 2021 8:59 AM  
**To:** [mmathews@glidepath.net](mailto:mmathews@glidepath.net); Joe Sedarski <[JOE.SEDARSKI@WESTWOODPS.COM](mailto:JOE.SEDARSKI@WESTWOODPS.COM)>  
**Subject:** MnDOT Preliminary Comments - Winnebago Solar

Good Afternoon Ms. Matthews,

MnDOT has reviewed the preliminary information provided in your mailing for the Winnebago Solar and Storage Project and offers the following comments for consideration:

1. MnDOT recommends that all new project access come from county and/or township roads
2. No permanent structures or aerial encroachment of associated facilities will be allowed on MnDOT right of way (excluding aerial or buried crossings of HVTL/electric cable/feeder lines, explained below)
3. If utilizing any existing accesses from state trunk highways, MnDOT permits will be needed as this is a change of use, even if temporary, from the existing access and any requests may need MnDOT District 7 Access Committee review
4. MnDOT District 7 staff requests that the developer consider potential glare affects on drivers



when designing placement of solar panels

5. MnDOT encourages developers to stay aware of our future projects so that they can plan accordingly for delivery of the equipment to the proposed project site(s) - [MnDOT District 7 Projects](#)
6. MnDOT's Office of Environmental Stewardship will need to review applicable permit applications due to any presence of sensitive vegetation, contamination, cultural resources, or protected wildlife within the project area/MnDOT property
7. Permit applications and instructions are located here:  
<http://www.dot.state.mn.us/utility/index.html> - keeping in mind that you may need more than one type of permit from MnDOT
8. MnDOT views solar generating projects as it would any other private commercial venture and does not consider a solar generating project to be a public utility for transportation purposes and therefore, any MnDOT land that these projects may wish to occupy would need to be leased (in the areas where a lease is feasible)
9. Any associated electric cable/feeder lines that run **along** a trunk highway right of way would need to be permitted through a municipal, cooperative or investor-owned electric service provider
10. Crossings are permitted without utilizing the above-mentioned providers

Early permit coordination is recommended and should be done through Steve Schoeb, MnDOT District 7 Engineering Specialist at [Steve.Schoeb@state.mn.us](mailto:Steve.Schoeb@state.mn.us) or work 507-304-6180 /cell 507-381-2564

Thank you for the opportunity to provide early feedback on this project. Please contact me with any questions.

***Stacy Kotch Egstad***

Utility Routing and Siting Coordinator  
Minnesota Department of Transportation  
Office of Land Management  
[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)



December 15, 2021

**VIA EMAIL ONLY**

Joe Sedarski  
Westwood Professional Services  
12701 Whitewater Dr, Suite 300  
Minnetonka, MN 55343

RE: File No R0027810.00  
Winnebago Solar and Storage Project  
Faribault County  
SHPO Number: 2022-0452

Dear Joe Sedarski:

Thank you for the opportunity to comment on the above referenced project. Information received on November 22, 2021 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 your submittal, Winnebago Solar and Storage LLC is proposing to develop a 150 MW Solar Energy Facility (Project) on approximately 1,311 acres in Faribault County. The proposed project will include the installation of solar modules and racking, solar inverters and associated transformers, onsite electrical collection lines, a substation, a main power transformer, a battery storage system, battery inverters and associated transformers, an overhead transmission line, a utility switchyard, fencing, an O&M building, and associated access roads.

We recommend that a background literature review for architectural and archaeological resources be completed for this Project. We also recommend that a Phase Ia archaeological assessment be completed. If as a result of this assessment, a Phase I archaeological survey is recommended, this survey should be conducted. The 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, 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 (including architectural resources that are listed in the National or State Register of Historic Places and archaeological sites). Indirect effects can also include changes to a historic property's use.

The resulting cultural resources report should include maps with clearly defined project areas including the location of the solar modules and associated equipment, any laydown yards, transmission lines, collector lines, access roads, and any other above-ground equipment structures (i.e. substations,

---

**MINNESOTA STATE HISTORIC PRESERVATION OFFICE**

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

[mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■ [mnshpo@state.mn.us](mailto:mnshpo@state.mn.us)

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

operation and maintenance buildings, etc) in relation to any identified cultural resources (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](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,

*Kelly Gragg-Johnson*

Kelly Gragg-Johnson  
Environmental Review Program Specialist

**From:** [Boettcher, Joanne \(DNR\)](#)  
**To:** [Joe Sedarski](#); [Michelle Matthews](#); [Annabel Sammons](#)  
**Cc:** [Warzecha, Cynthia \(DNR\)](#); [Benage, Megan \(DNR\)](#); [Innvaer, Stein H \(DNR\)](#)  
**Subject:** DNR Early Coordination comments on Winnebago Solar and Storage Project  
**Date:** Tuesday, January 11, 2022 12:00:58 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[Erosion\\_InvasiveSpecies\\_StandardGuidance\\_20200707.pdf](#)

---

Hi Joe,

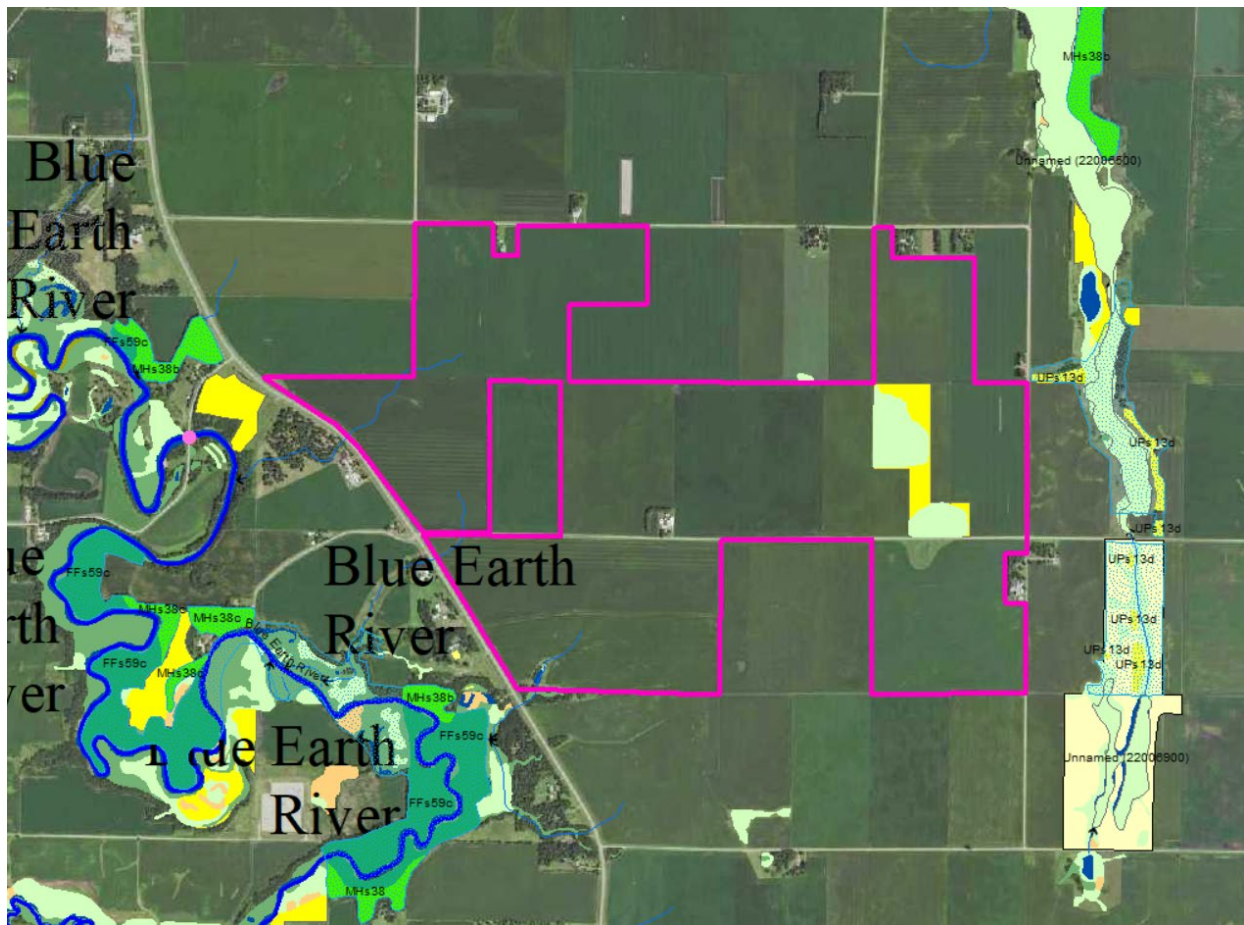
Thanks for the responses. Also, I apologize for the delay in getting early coordination comments to you on this. We look forward to continued collaboration with the project to protect natural resources while developing sustainable energy resources in Minnesota. Let me know if you have any questions. Our comments so far include:

**General recommendations**

- Refer to the [DNR Commercial Siting Guidance](#) for a broad overview of DNR recommendations. Please note that the guidance is 5 years old, and our specific recommendations may have evolved. For example, our deer exclusion fencing recommendations are currently evolving, where we generally recommend 8-10 feet tall fencing for deer exclusion and may no longer recommend smooth wire (and definitely not barbed wire) as some entanglement issues have occurred. Once more specific infrastructure locations are identified, I will work with our wildlife staff to develop any potential fencing recommendations in more detail.
- Please refer to the [MNGeo site](#) for natural resource and other shapefiles referenced in these comments. An informal map is included below for quick reference. Note that non-public shapefiles (such as much of the NHIS database associated with listed species) are not available on this website.
- An NHIS review or concurrence request will be necessary. Often times, requesting that review is best once the specific areas of impact and infrastructure are identified. For your planning purposes, please note that review request are taking approximately 4 months and the results are valid for one year.
- Please send in more specific infrastructure locations (or updated info if the project study boundary changes) via shapefile when identified for DNR review. Please expect that the DNR will request updated shapefile (if any changes were made) at formal review points.
- We recommend that the project establish and manage native vegetation within the solar facility per the [Guidance for Develop a Vegetation Establishment and Management Plan for Solar Facilities](#). The DNR would like to review and comment on the project's Vegetation Establishment and Management Plan.
- We recommend practices and construction timing that minimize impacts to wildlife habitat including nesting and rearing habitat. We also recommend wildlife friendly erosion control and invasive species best practices (see attached).

**Project-specific recommendations**

- Ensure that the project contacts BWSR regarding any limitations or requirements regarding the onsite RIM easement. A large portion of the RIM easement is also an NWI wetland. Ensure any WCA requirements are met.
- The area of the RIM easement and nearby locations were historically a wetland. We'd recommend not siting infrastructure in this area.
- The project area contains a mix of soil types, roughly half of which are poorly drained. We have seen subsurface drainage networks fail over time with a change of land use, contributing to construction and operational issues. We urge you to plan carefully to avoid complications due to soil types and drainage issues. Seed mixes should be matched to the soil conditions.
- The site is "nestled" between the Blue Earth River corridor on the West and a wetland complex on the East. Due to these habitat features, this area may be used by wildlife. As mentioned above, we can look at the fencing more once specific infrastructure is identified.
- Some flow paths (identified as unnamed streams in the below map) occur on the West edge of the project area. We recommend avoiding these areas and careful erosion protection within these areas.
- Can you provide more safety information on the storage aspect of the project? I am not familiar with this type of project. Are there any additional regulatory requirements regarding this storage?



Joanne Boettcher  
Regional Environmental Assessment Ecologist  
MNDNR – Mankato  
(507) 389-8813



**From:** Joe Sedarski <Joe.Sedarski@westwoodps.com>  
**Sent:** Wednesday, December 29, 2021 2:54 PM  
**To:** Boettcher, Joanne (DNR) <Joanne.Boettcher@state.mn.us>  
**Cc:** Michelle Matthews <mmatthews@glidepath.net>; Annabel Sammons <Annabel.Sammons@westwoodps.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>  
**Subject:** RE: Follow up to Request for Comments on Winnebago Solar and Storage Project

Hi Joanne, thanks for these questions. We are still preparing the Project layout and have been going through revisions on that, and we are getting close. Once that is completed, we can share a more detailed kmz for your review/use. Concerning the RIM easement area, the plan is to avoid placing Project facilities within this area. More details to come on flow paths, pollinator friendly, and related questions.

In the meantime, we welcome any comments (specific or general) that you may have at this time.

Thanks again!  
Joe

**Joseph Sedarski, PE, JD**  
Senior Project Manager  
[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)  
Licensed in MN

**direct** (952) 207-7631  
**main** (952) 937-5150  
**cell** (612) 214-6658

**Westwood**  
12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

[westwoodps.com](http://westwoodps.com)  
(888) 937-5150

---

**From:** Boettcher, Joanne (DNR) <[Joanne.Boettcher@state.mn.us](mailto:Joanne.Boettcher@state.mn.us)>

**Sent:** Wednesday, December 29, 2021 12:51 PM

**To:** Joe Sedarski <[Joe.Sedarski@westwoodps.com](mailto:Joe.Sedarski@westwoodps.com)>

**Cc:** Michelle Matthews <[mmatthews@glidepath.net](mailto:mmatthews@glidepath.net)>; Annabel Sammons <[Annabel.Sammons@westwoodps.com](mailto:Annabel.Sammons@westwoodps.com)>; Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>

**Subject:** RE: Follow up to Request for Comments on Winnebago Solar and Storage Project

Thanks Joe. Do you have a shapefile or site plan and project description that identifies specific infrastructure, fencing, roads, etc. ? I'm also wondering what the plans are for the RIM easement, fencing (locations, height and type), and some of the flow paths on the West side down to the Blue Earth River. Are you planning to incorporate pollinator plantings? Any preliminary info you have can help me develop more specific feedback. If you haven't yet identified these features, that is fine; my comments will be more general. Thanks, Joanne

**From:** [Leonard Wabasha \(TO\)](#)  
**To:** [Joe Sedarski](#); [CulturalResources](#)  
**Cc:** [Michelle Matthews](#); [Annabel Sammons](#)  
**Subject:** RE: Winnebago Solar and Storage Project, Faribault Co, MN  
**Date:** Thursday, November 18, 2021 5:28:44 PM  
**Attachments:** [image001.png](#)

---

Dear Joe Sedarski

Thank you for the opportunity to consult, at this time I would like to be kept informed of the progress of the project, when archaeological reports are available please share them with us. Thank you and have a great day!



**LEONARD WABASHA**  
Director of Cultural Resources • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[hokokatati.org](http://hokokatati.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Joe Sedarski <Joe.Sedarski@westwoodps.com>  
**Sent:** Thursday, November 18, 2021 2:18 PM  
**To:** CulturalResources <CulturalResources@ShakopeeDakota.org>; Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>  
**Cc:** Michelle Matthews <mmatthews@glidepath.net>; Annabel Sammons <Annabel.Sammons@westwoodps.com>  
**Subject:** Winnebago Solar and Storage Project, Faribault Co, MN

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Good afternoon Leonard Wabasha,

On behalf of Winnebago Solar and Storage LLC (Winnebago), please find attached a description of the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota and request for comments and/or questions you may have concerning the Project.

We are both emailing and mailing the attached letter to you, and response(s) will be included in the Site Permit Application (SPA) that will be submitted to the Minnesota Public Utilities Commission at the end of the year or first part of next year.

Please feel free to contact either Michelle at GlidePath or myself should you like to discuss or have questions.

We appreciate your review of the attached letter and comments you may have at this time.

Best Regards,

Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631

**main** (952) 937-5150

**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300

Minnetonka, MN 55343

**[westwoodps.com](http://westwoodps.com)**

**(888) 937-5150**

~~~~~  
The information contained in this message is confidential. If you are not the intended recipient, dissemination or copying of this information is prohibited.  
If you have received this communication in error, please notify the sender and delete the message from your system. Thank you!  
~~~~~



---

**From:** Jaime Arsenault <Jaime.Arsenault@whiteearth-nsn.gov>  
**Sent:** Monday, December 6, 2021 12:42 PM  
**To:** mmathews@glidepath.net; Joe Sedarski <joe.sedarski@westwoodps.com>  
**Subject:** Winnebago Solar and Storage Project Faribault County

Hello,

Thank you for the opportunity to comment on the Winnebago Solar and Storage Project project.

The White Earth Tribal Historic Preservation Office has reviewed the project location and concludes that there are no known (to us) historic sites located near the project area.

However, White Earth is always concerned about the preservation and protection of waterways and wild rice watersheds as we consider these to be cultural sites. Should these waterways be located within or near the APE, I ask that you please contact my office. We ask that special precautions be taken to ensure the quality, quantity and safety of the wild rice and connecting watersheds are not affected in a negative way. Does your project have the potential to increase sediment levels along the Blue Earth River? Will there be any other impacts to the Blue Earth River or surrounding wetlands? I ask this because I am aware that this river is already struggling and it has a direct impact on the Minnesota River as the Blue Earth River is the largest tributary.

While there are no known cultural sites associated with the proposed location, this does not preclude the possibility for deeply buried or currently unknown cultural sites associated with the location. Please note, if cultural materials are uncovered during the course of construction, we ask that all work cease and this Tribal Historic Preservation Office be contacted at: [Jaime.arsenault@whiteearth-nsn.gov](mailto:Jaime.arsenault@whiteearth-nsn.gov)

Respectfully,

Jaime Arsenault

White Earth Nation

PO Box 418

White Earth, MN 56569

Phone: (218) 983-3285 (ext. 5807)

Email: [Jaime.arsenault@whiteearth-nsn.gov](mailto:Jaime.arsenault@whiteearth-nsn.gov)

**From:** [Annabel Sammons](#)  
**To:** [Shannon Hansen](#)  
**Subject:** FW: Winnebago Solar and Storage Project Faribault County  
**Date:** Wednesday, January 31, 2024 11:20:15 AM

---

---

**From:** Joe Sedarski <Joe.Sedarski@westwoodps.com>  
**Sent:** Tuesday, December 7, 2021 10:56 AM  
**To:** Jaime Arsenault <Jaime.Arsenault@whiteearth-nsn.gov>; mmathews@glidepath.net  
**Cc:** Annabel Sammons <Annabel.Sammons@westwoodps.com>; Ryan Grohnke <Ryan.Grohnke@westwoodps.com>; MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>  
**Subject:** RE: Winnebago Solar and Storage Project Faribault County

Good morning Jaime Arsenault,

Thanks very much for your review of this Project and comments below – we appreciate this information! We will look further into whether waterways and wild rice watersheds are located within or near the APE and let you know.

Concerning the potential to increase sediment levels along the Blue Earth River, the Project will likely be a net benefit to water quality given applicable ag land will be converted to a solar energy generating facility (and no longer in row-crop production), non-facility areas would be vegetated and maintained for the life of the Project (~30 years), and stormwater from Project facilities would be managed via stormwater management ponds.

Additional analysis of potential impacts from the Project will be included in the Site Permit Application which has not yet been submitted to the MN Public Utilities Commission.

Thanks again and best regards,  
Joe

**Joseph Sedarski, PE, JD**

**Senior Project Manager**

[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)

Licensed in MN

**direct** (952) 207-7631  
**main** (952) 937-5150  
**cell** (612) 214-6658

**Westwood**

12701 Whitewater Drive, Suite 300  
Minnetonka, MN 55343

[westwoodps.com](http://westwoodps.com)

(888) 937-5150

---

**From:** Jaime Arsenault <[Jaime.Arsenault@whiteearth-nsn.gov](mailto:Jaime.Arsenault@whiteearth-nsn.gov)>

**Sent:** Monday, December 6, 2021 12:42 PM

**To:** [mmathews@glidepath.net](mailto:mmathews@glidepath.net); Joe Sedarski <[joe.sedarski@westwoodps.com](mailto:joe.sedarski@westwoodps.com)>

**Subject:** Winnebago Solar and Storage Project Faribault County

Hello,

Thank you for the opportunity to comment on the Winnebago Solar and Storage Project project.

The White Earth Tribal Historic Preservation Office has reviewed the project location and concludes that there are no known (to us) historic sites located near the project area.

However, White Earth is always concerned about the preservation and protection of waterways and wild rice watersheds as we consider these to be cultural sites. Should these waterways be located within or near the APE, I ask that you please contact my office. We ask that special precautions be taken to ensure the quality, quantity and safety of the wild rice and connecting watersheds are not affected in a negative way. Does your project have the potential to increase sediment levels along the Blue Earth River? Will there be any other impacts to the Blue Earth River or surrounding wetlands? I ask this because I am aware that this river is already struggling and it has a direct impact on the Minnesota River as the Blue Earth River is the largest tributary.

While there are no known cultural sites associated with the proposed location, this does not preclude the possibility for deeply buried or currently unknown cultural sites associated with the location. Please note, if cultural materials are uncovered during the course of construction, we ask that all work cease and this Tribal Historic Preservation Office be contacted at: [Jaime.arsenault@whiteearth-nsn.gov](mailto:Jaime.arsenault@whiteearth-nsn.gov)

Respectfully,

Jaime Arsenault

White Earth Nation

PO Box 418

White Earth, MN 56569

Phone: (218) 983-3285 (ext. 5807)

Email: [Jaime.arsenault@whiteearth-nsn.gov](mailto:Jaime.arsenault@whiteearth-nsn.gov)

## Annabel Sammons

---

**From:** Annabel Sammons  
**Sent:** Thursday, May 26, 2022 12:20 PM  
**To:** Terry Kemper  
**Subject:** RE: Winnebago Solar Energy Project

Good morning Terry!

Of course! We wanted to send a follow-up to our email/letter that we sent last fall (November 18, 2021).

We have not utilized tribal involvement on the survey. Should you have knowledge of cultural resources in the Project area we would like to have further discussions to be certain that resources can be avoided by any development.

We will be happy to submit the final report to you at the same time we submit to SHPO. Currently the report has not been submitted to SHPO due to the possibility additional survey may be required if there are any changes to the Project design. I have attached the interim memo summarizing the investigations to date. No archaeological resources were identified during the survey. Should artifacts be identified, their disposition will be up to the landowner as all land is privately owned.

If you have any questions, please let me know!

Thank you!

**Annabel Sammons**

**Environmental Scientist**

annabel.sammons@westwoodps.com

**direct** (585) 358-7060  
**cell** (317) 453-1416

**Westwood**

75 Thruway Park Dr, Unit A  
West Henrietta, NY 14586

**westwoodps.com**  
**(888) 937-5150**

---

**From:** Terry Kemper <Terry.Kemper@millelacsband.com>  
**Sent:** Thursday, May 26, 2022 9:16 AM  
**To:** Annabel Sammons <Annabel.Sammons@westwoodps.com>  
**Subject:** RE: Winnebago Solar Energy Project

Good Morning.

Thank you for reaching out to the Mille lacs Band regarding this solar project.

The THPO department for the Mille Lacs Band would ask a question.

Do you have any tribal involvement in the archeology survey?

We are very interested in seeing the current survey results. Has there been any artifacts found? and if so what was done with them?

Miigwetch (thank you)

---

**From:** Annabel Sammons <[Annabel.Sammons@westwoodps.com](mailto:Annabel.Sammons@westwoodps.com)>  
**Sent:** Thursday, May 26, 2022 7:31 AM

**To:** Terry Kemper <[Terry.Kemper@millelacsband.com](mailto:Terry.Kemper@millelacsband.com)>

**Cc:** David Weetman <[David.Weetman@westwoodps.com](mailto:David.Weetman@westwoodps.com)>; Mike Wallgren <[mwallgren@glidepath.net](mailto:mwallgren@glidepath.net)>; Peter Rood <[prood@glidepath.net](mailto:prood@glidepath.net)>

**Subject:** Winnebago Solar Energy Project

Good morning!

On behalf of Winnebago Solar and Storage LLC (Winnebago), please find attached an updated description of the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota and request for comments and/or questions you may have concerning the Project.

We are both emailing and mailing the attached letter to you, and response(s) will be included in the Site Permit Application (SPA) that will be submitted to the Minnesota Public Utilities Commission at the end of the year or first part of next year.

Please feel free to contact either Peter at GlidePath or myself should you like to discuss or have questions.

We appreciate your review of the attached letter and comments you may have at this time.

Best Regards,  
Annabel

**Annabel Sammons**

**Environmental Scientist**

[annabel.sammons@westwoodps.com](mailto:annabel.sammons@westwoodps.com)

**direct** (585) 358-7060

**cell** (317) 453-1416

**Westwood**

75 Thruway Park Dr, Unit A  
West Henrietta, NY 14586

**[westwoodps.com](http://westwoodps.com)**

**(888) 937-5150**

## Annabel Sammons

---

**From:** Annabel Sammons  
**Sent:** Tuesday, June 7, 2022 2:07 PM  
**To:** 'Leonard Wabasha (TO)'  
**Subject:** RE: Winnebago Solar Energy Project  
**Attachments:** Winnebago\_Cultural\_Interim\_Memo\_211229.pdf

Hi!

We will be happy to submit the final report to you at the same time we submit to SHPO. Currently the report has not been submitted to SHPO due to the possibility additional survey may be required if there are any changes to the Project design. I have attached the interim memo summarizing the investigations to date.

Thank you!

**Annabel Sammons**

**Environmental Scientist**

annabel.sammons@westwoodps.com

**direct** (585) 358-7060  
**cell** (317) 453-1416

**Westwood**

75 Thruway Park Dr, Unit A  
West Henrietta, NY 14586

**westwoodps.com**

(888) 937-5150

---

**From:** Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>  
**Sent:** Tuesday, June 7, 2022 12:29 PM  
**To:** Annabel Sammons <Annabel.Sammons@westwoodps.com>  
**Subject:** RE: Winnebago Solar Energy Project

Thanks Annabel

Would an arch. report be available to view? I just want to perform my due diligence... Thanks and Have a Great Day!!



**LEONARD WABASHA**

Director of Cultural Resources • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
shakopeedakota.org  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Annabel Sammons <[Annabel.Sammons@westwoodps.com](mailto:Annabel.Sammons@westwoodps.com)>  
**Sent:** Tuesday, June 7, 2022 8:45 AM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>; CulturalResources <[CulturalResources@ShakopeeDakota.org](mailto:CulturalResources@ShakopeeDakota.org)>  
**Subject:** RE: Winnebago Solar Energy Project

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Good morning Leonard!

Thank you for your response! A database search was requested from the OSA and SHPO on July 28, 2021 and all information has been reviewed. Additionally, the project has an unanticipated discovery plan.

If there is anything else you would like to know, please let me know!

Thank you!

**Annabel Sammons**

**Environmental Scientist**

annabel.sammons@westwoodps.com

**direct** (585) 358-7060

**cell** (317) 453-1416

**Westwood**

75 Thruway Park Dr, Unit A  
West Henrietta, NY 14586

**westwoodps.com**

(888) 937-5150

---

**From:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>

**Sent:** Thursday, May 26, 2022 10:44 AM

**To:** Annabel Sammons <[Annabel.Sammons@westwoodps.com](mailto:Annabel.Sammons@westwoodps.com)>; CulturalResources  
<[CulturalResources@ShakopeeDakota.org](mailto:CulturalResources@ShakopeeDakota.org)>

**Cc:** David Weetman <[David.Weetman@westwoodps.com](mailto:David.Weetman@westwoodps.com)>; Mike Wallgren <[mwallgren@glidepath.net](mailto:mwallgren@glidepath.net)>; Peter Rood  
<[prood@glidepath.net](mailto:prood@glidepath.net)>

**Subject:** RE: Winnebago Solar Energy Project

Thank you for the opportunity to consult, please demonstrate that a records search through SHPO or the Office of the State Archaeologist has been completed and also please have an Inadvertent Discovery Plan in place, Thank You and Have a Greta Day!



**LEONARD WABASHA**

Director of Cultural Resources • Cultural Resources

Shakopee Mdewakanton Sioux Community

d: 952.496.6120

shakopeedakota.org

[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Annabel Sammons <[Annabel.Sammons@westwoodps.com](mailto:Annabel.Sammons@westwoodps.com)>

**Sent:** Thursday, May 26, 2022 7:33 AM

**To:** CulturalResources <[CulturalResources@ShakopeeDakota.org](mailto:CulturalResources@ShakopeeDakota.org)>; Leonard Wabasha (TO)  
<[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>

**Cc:** David Weetman <[David.Weetman@westwoodps.com](mailto:David.Weetman@westwoodps.com)>; Mike Wallgren <[mwallgren@glidepath.net](mailto:mwallgren@glidepath.net)>; Peter Rood



<[prood@glidepath.net](mailto:prood@glidepath.net)>

**Subject:** Winnebago Solar Energy Project

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Good morning!

On behalf of Winnebago Solar and Storage LLC (Winnebago), please find attached an updated description of the proposed Winnebago Solar and Storage Project (Project) in Faribault County, Minnesota and request for comments and/or questions you may have concerning the Project.

We are both emailing and mailing the attached letter to you, and response(s) will be included in the Site Permit Application (SPA) that will be submitted to the Minnesota Public Utilities Commission at the end of the year or first part of next year.

Please feel free to contact either Peter at GlidePath or myself should you like to discuss or have questions.

We appreciate your review of the attached letter and comments you may have at this time.

Best Regards,  
Annabel

**Annabel Sammons**

**Environmental Scientist**

[annabel.sammons@westwoodps.com](mailto:annabel.sammons@westwoodps.com)

**direct** (585) 358-7060  
**cell** (317) 453-1416

**Westwood**

75 Thruway Park Dr, Unit A  
West Henrietta, NY 14586

**[westwoodps.com](http://westwoodps.com)**

**(888) 937-5150**

~~~~~  
The information contained in this message is confidential. If you are not the intended recipient, dissemination or copying of this information is prohibited.

If you have received this communication in error, please notify the sender and delete the message from your system. Thank you!

~~~~~

~~~~~  
The information contained in this message is confidential. If you are not the intended recipient, dissemination or copying of this information is prohibited.

If you have received this communication in error, please notify the sender and delete the message from your system. Thank you!

~~~~~

# **Appendix B-5**

## *Agency Meeting Notes*



# WINNEBAGO SOLAR & STORAGE

150MW SOLAR + 50MW STORAGE

WINNEBAGO, FARIBAULT COUNTY, MN

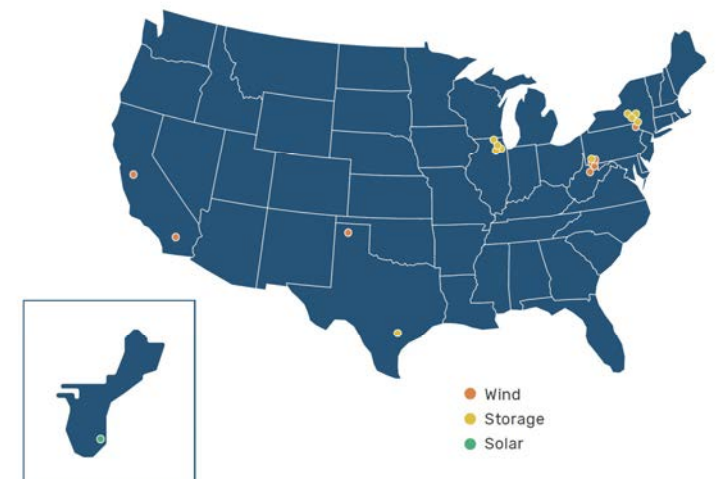
SEPTEMBER 2021

# AGENDA

1. Introductions
2. GlidePath company introduction
3. Winnebago Project overview
  - Project Characteristics
  - Why Solar + Storage in MISO?
  - Battery Storage
  - Project Studies
4. Questions, comments, feedback?

# GLIDEPATH | COMPANY OVERVIEW

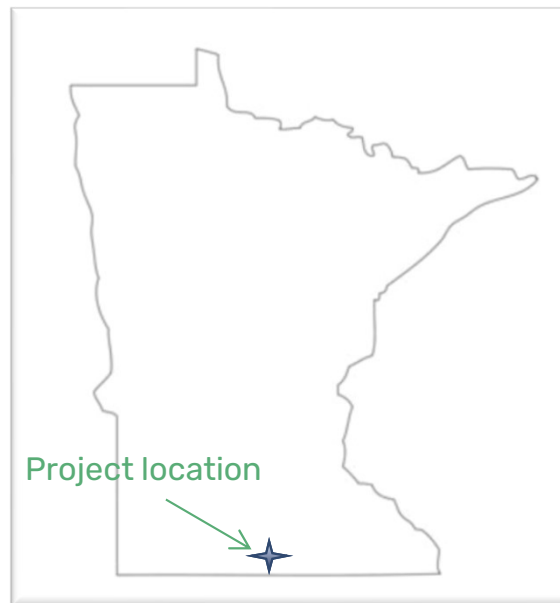
- GlidePath is a leading independent developer and owner of advanced energy systems. Our nationwide portfolio includes:
  - >600 MW of battery storage and renewable energy projects;
  - 3 standalone 50 MW storage projects in MN active in the MISO queue
  - >450 MW greenfield development portfolio of solar energy projects; and
  - >2.1 GW pipeline of battery storage projects.
- GlidePath's team has experience across the energy industry, from project development and finance to engineering, technology, construction and operations.
- U.S. offices in St. Paul, MN and Elmhurst, IL





# WINNEBAGO | PROJECT OVERVIEW

- **Project Location:** Winnebago, Faribault County (Blue Earth City Twp), MN
- **Environmental Studies:** Summer 2021 (Ongoing)
- **Permits/Approvals:** Q4 2022 – Q1 2023
- **Construction:** Q1 2023 – Q4 2023
- **Proposed In-Service Date:** Q4 2023
- **Solar Nameplate Capacity:** 150 MWac
- **BESS Capacity / Duration:** 50 MWac / 200 MWh



# SOLAR + STORAGE IN MN

## MISO

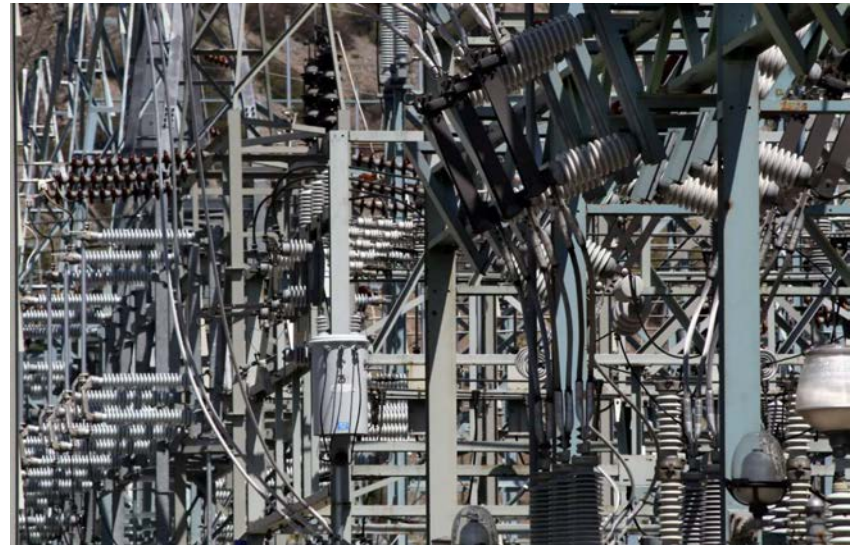
- High renewable penetration (wind projects in western MN), leads to high congestion
- Transmission infrastructure needs to catch up with generation development, and storage can help
- Solar and storage can relieve congestion and store energy produced to be dispatched when consumers need it most (and when the grid needs it most)

## Offtake Opportunities

- Ancillary services (MISO's regulation reserve market)
- Energy arbitrage
- Capacity, with potential additional options of network transmission charge reduction and storage-as-transmission
- PPA

## State/Utility Directives

- MN directives: 25% renewable by 2025, already achieved
- Xcel: pledged to be carbon free by 2050
- Xcel's IRP (2019 and 2021) highlights the future role of storage; likely interest in project to show their commitment to customer base



# PROJECT CHARACTERISTICS

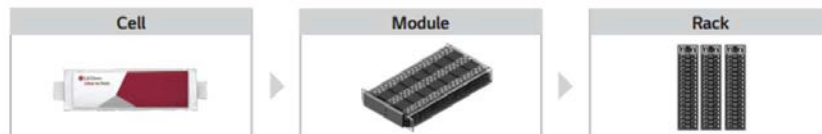
- **Interconnection: MISO DPP 2020 West queue position**
  - Point of interconnection: Huntley – Blue Earth 161kV (Xcel Energy)
- **Existing land use**
  - 96% row crop farmland, 4% CRP land
  - One residence within project footprint (participating landowner)
- **Preliminary Project components**
  - Solar Technology: Trina Solar bi-facial 550Wdc panels on Nextracker single-axis tracking with Power Electronics 3,550kW inverters
  - BESS Technology: CATL or similar Li-Ion batteries with Nordec or equivalent software controls and Power Electronics 2,920kW inverters
- **Permitting**
  - Site Permit and Certificate of Need in development
  - Route permit not required
- **Additional considerations**
  - Vegetation and screening
  - Pollinator-friendly habitat



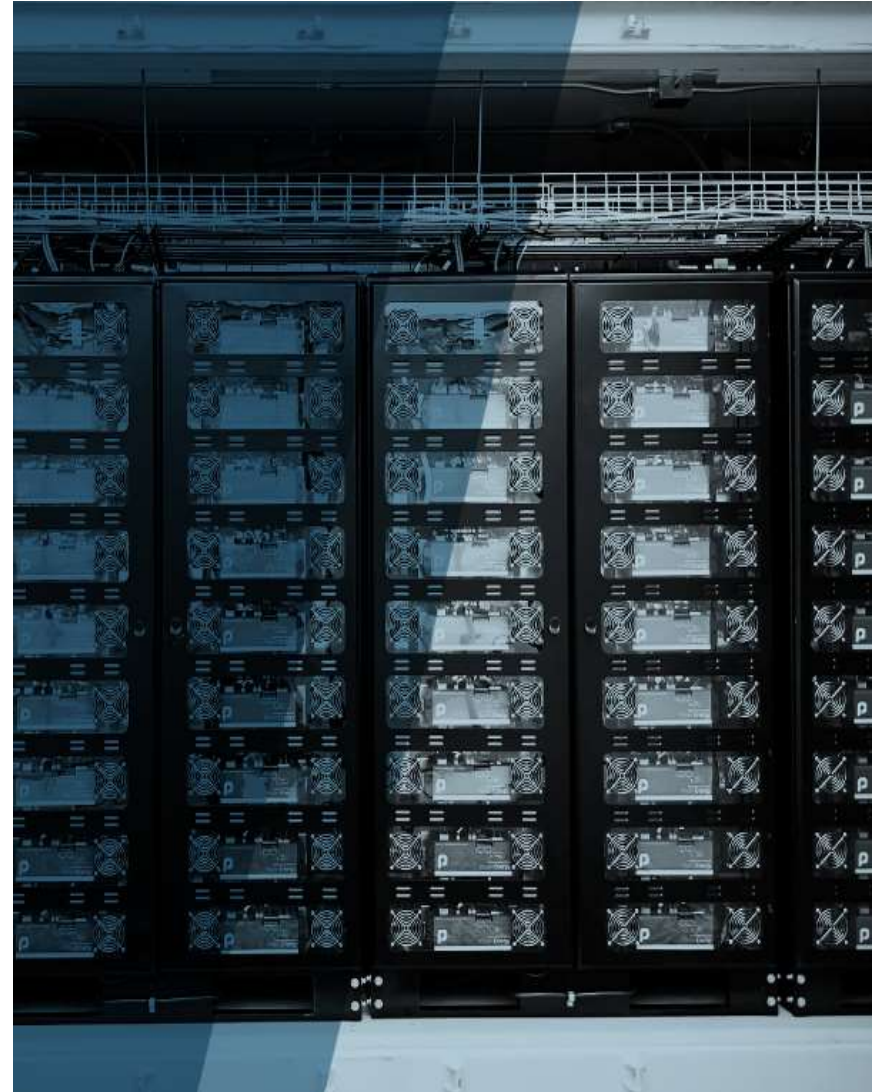


# BESS (BATTERY ENERGY STORAGE SYSTEM)

- **Project components:**
  - Lithium-ion battery modules will be stacked in racks within custom enclosures.
  - Batteries will operate using direct current (DC) and will be connected to inverters to convert the DC electricity to alternating current (AC) to be used by the grid.
  - From the inverter, the energy will pass through a transformer to increase the voltage to match that of the interconnecting utility.
  - Energy from multiple sets of battery combinations will be combined and, after passing through metering and protection equipment, will be transmitted to the grid at the point of interconnection.



- Each enclosure includes its own fire mitigation system





# GLIDEPATH STORAGE PROJECTS



# Project Considerations and Studies

- **Westwood will prepare bulleted text indicating work/studies/considerations on this slide – MISO queue and process; Site identification; Site studies (desktop and field – various and will list out); Engineering and Project layout; Land survey and setback analysis; Faribault County ordinance review; Prime Farmland; Vegetation Management; Ag Impact Assessment; Certificate of Need; Site Permit, etc.**

# QUESTIONS, FEEDBACK?

## GLIDEPATH

MICHELLE MATTHEWS  
SR. DIRECTOR OF DEVELOPMENT

2147 UNIVERSITY AVE W #204  
ST PAUL, MN 55114  
mmatthews@glidepath.net  
(612) 590-8653

## WESTWOOD

JOE SEDARSKI  
SR. PROJECT MANAGER

12701 WHITEWATER DRIVE, SUITE 300  
MINNETONKA, MN 55343  
joe.sedarski@westwoodps.com  
(952) 207-7631

## FREDRICKSON & BYRON, P.A.

JEREMY DUEHR  
COUNSEL

200 SOUTH SIXTH STREET, SUITE 4000  
MINNEAPOLIS, MN 55402  
jduehr@fredlaw.com  
(612) 492-7413

## Meeting Minutes

**Meeting Date:** September 20, 2021

**Project Number:** R0027810.00

**Project Name:** Winnebago Solar and Storage Project

**Meeting Location:** Online via teams

**Meeting Topic:** Introduce Project to MDA

Attendees:	Company Name:	Contact Info (email/phone)
Joe Sedarski Annabel Sammons	Westwood Professional Services	<a href="mailto:Joe.Sedarski@westwoodps.com">Joe.Sedarski@westwoodps.com</a> ; <a href="mailto:Annabel.Sammons@westwoodps.com">Annabel.Sammons@westwoodps.com</a>
Michelle Matthews	GlidePath	MMatthews@glidepath.net
Jeremy Duehr	Fredrikson & Byron	<a href="mailto:JDuehr@fredlaw.com">JDuehr@fredlaw.com</a> ;
Stephan Roos	Minnesota Department of Agriculture (Ag Marketing and Development)	Stephan.roos@state.ms.us



## Meeting Notes

Item:	Discussion:
1	Introductions to individuals.
2	Michelle pulled up Project presentation and introduced GlidePath and the Project (capacity, battery storage, location, need, and timelines)
3	<p>No large-scale transmission line is expected as the point of interconnection is in the Project Area.</p> <p>Options are open as GlidePath isn't locked into a certain PPA or providing certain ancillary services. This will allow the Project to be customized to fit needs.</p> <p>Explanation of environmental studies that have been conducted and those to be conducted, BESS, and fire mitigation. Exhibits for prime farmland and wetlands were shared. Stephen confirmed CRP land location.</p>
4	<p><b>Q/A Time:</b></p> <p>Stephan – Prime farmland conversations are driven by the PUC's rule from the 80's and the MDA is working with the EERA to develop guidance to address the rule. It is very important to discuss the necessity of the location chosen for the Project. It is less about how productive prime farmland is and more about how it is the least environmentally sensitive land.</p> <p>Stephan – The AIMP should focus on preserving the qualities of the soil and if possible, improve it. Maintaining drainage systems is also very important. The same goes for the VMP – preserving soil is the focus. Pollinator friendly is not required but the PUC looks upon it favorably. Stephen mentioned liking the plan for the fire mitigation plan- discuss with EERA about maybe adding it to the AIMP.</p> <p>Stephan – asked about whether the land would be leased or not. Michelle answered that most of the Project area will be leased, but a small portion – for the interconnection, storage, and possibly the substation, is under a purchase option. Stephen mentioned that leasing land is looked upon favorably as it suggests that the Project is more likely to be temporary, lease payments give farmers a stream of revenue, and agricultural co-use of the land can be looked at more easily.</p> <p>Stephan – prime farmland justification needs to be looked at closely and clearly communicated; the PUC doesn't want their sole decision to be about prime farmland</p>

## Meeting Minutes

**Meeting Date:** September 22, 2021

**Project Number:** R0027810.00

**Project Name:** Winnebago Solar and Storage Project

**Meeting Location:** Online via teams

**Meeting Topic:** Introduce Project to PUC/Department of Commerce

Attendees:	Company Name:	Contact Info (email/phone)
Joe Sedarski Annabel Sammons	Westwood Professional Services	<a href="mailto:Joe.Sedarski@westwoodps.com">Joe.Sedarski@westwoodps.com</a> ; <a href="mailto:Annabel.Sammons@westwoodps.com">Annabel.Sammons@westwoodps.com</a>
Michelle Matthews	GlidePath	MMatthews@glidepath.net
Jeremy Duehr	Fredrikson & Byron	<a href="mailto:JDuehr@fredlaw.com">JDuehr@fredlaw.com</a> ;
Cezar Panait Charley Bruce Bret Eknes	Minnesota PUC	<a href="mailto:Cezar.Panait@state.mn.us">Cezar.Panait@state.mn.us</a> <a href="mailto:Charley.Bruce@state.mn.us">Charley.Bruce@state.mn.us</a> <a href="mailto:Bret.Eknes@state.ms.us">Bret.Eknes@state.ms.us</a>
Louise Miltich David Birkholz Andrew Levi	Department of Commerce	<a href="mailto:Louise.Miltich@state.mn.us">Louise.Miltich@state.mn.us</a> <a href="mailto:David.Birkholz@sate.mn.us">David.Birkholz@sate.mn.us</a> Andrew.Levi@state.ms.us

## Meeting Notes

Item:	Discussion:
1	Introductions to individuals.
2	Michelle pulled up Project presentation and introduced GlidePath and the Project (capacity, battery storage, location, need, and timelines)
3	<p>Bret asked what the sizes are of the other projects that GlidePath has done around the country. Michelle answered that most are large scale and that when they had just started – some were smaller (around 10-20 megawatt sites)</p> <p>Cezar asked Michelle to share the powerpoint with him. Jeremy and Michelle will discuss and get back to him.</p> <p>Covered need for solar and storage in Minnesota and pointed out that storage will help the congestion that is occurring.</p> <p>Options are open as GlidePath isn't locked into a certain PPA or providing certain ancillary services. This will allow the Project to be customized to fit needs.</p> <p>Explanation of environmental studies that have been conducted and those to be conducted, BESS, and fire mitigation. Exhibits for prime farmland and wetlands were shared. Stephen confirmed CRP land location.</p>
4	<b>Q/A Time:</b>



## Meeting Minutes

**Meeting Date:** September 29, 2021

**Project Number:** R0027810.00

**Project Name:** Winnebago Solar and Storage Project

**Meeting Location:** Online via teams

**Meeting Topic:** Introduce Project to MNDNR and USFWS

Attendees:	Company Name:	Contact Info (email/phone)
Joe Sedarski Annabel Sammons	Westwood Professional Services	<a href="mailto:Joe.Sedarski@westwoodps.com">Joe.Sedarski@westwoodps.com</a> ; <a href="mailto:Annabel.Sammons@westwoodps.com">Annabel.Sammons@westwoodps.com</a>
Michelle Matthews	GlidePath	MMatthews@glidepath.net
Jeremy Duehr	Fredrikson & Byron	<a href="mailto:JDuehr@fredlaw.com">JDuehr@fredlaw.com</a> ;
Joanne Boettcher Dawn Marsh	Minnesota Department of Natural Resources	<a href="mailto:Joanne.Boettcher@state.mn.us">Joanne.Boettcher@state.mn.us</a> <a href="mailto:Cynthia.Warzecha@state.mn.us">Cynthia.Warzecha@state.mn.us</a>
Cynthia Warzecha	U.S. Fish and Wildlife Service	Dawn_Marsh@fws.gov

## Meeting Notes

Item:	Discussion:
1	Introductions to individuals.
2	Michelle pulled up Project presentation and introduced GlidePath and the Project (capacity, battery storage, location, need, and timelines)
3	<p>Michelle covered the need for solar and storage in the state.</p> <p>No defined offtake yet as there are many avenues and GlidePath wants to pick the best match.</p> <p>Jeremy will be putting together the Certificate of Need. No route permit is needed.</p> <p>As far as battery storage is concerned, each structure has it's own fire mitigation plan.</p> <p>Explanation of environmental studies that have been conducted and those to be conducted, BESS, and fire mitigation. Exhibits for prime farmland and wetlands were shared. CRP land was reviewed and the location was pointed out.</p> <p>Critical issues analysis was done Summer 2020.</p>
4	<p><b>Q/A Time:</b></p> <p>Cynthia – have you been in touch with the MPCA? Due to the impervious surface of the storage facility – they might want to be in on that. Joe responded that there is an outreach plan and the group will talk to them (specifically Todd Smith as Cynthia pointed out).</p> <p>Joanne – requested early coordination in the form of a shapefile of the project footprint. She also requested that the NHIS request be sent in as soon as possible as the project is nestled between two high habitat production areas. There will need to be a focus on fencing (barbed wire) and reducing erosion.</p> <p>Jeremy – asked about Joanne's comment about barbed wire and Joanne answered that recommendations on fencing have been evolving and it will need to be looked at.</p> <p>Cynthia – there should be space between fencing and the roadway for passage area for deer/wildlife</p> <p>Joanne- is battery storage new in Minnesota? What are some of the concerns? Hazardous materials? Michelle answered that it is pretty new and dealing with fire mitigation will be a focus. Michelle will look into specifics about the hazards and provide them.</p>

Item:	Discussion:
	Cynthia – excited to learn about storage as it is relatively new and appreciates that the storage will alleviate congestion
5	<b>Action Item(s):</b> Westwood to send shapefile and put in NHIS request.