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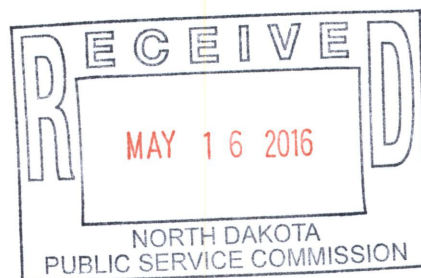
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May 16, 2016

Mr. Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, North Dakota 58505-0480

Re: Bison 1 Wind Project
Oliver/Morton Counties Siting Application
Case No. PU-09-151

Re: Bison 1 HVTL Project
Case No. PU-09-587

Dear Mr. Nitschke:

Please find attached for filing in both the above-referenced Cases, Minnesota Power's Bison Interim Bald Eagle Risk Minimization Strategy.

Yours truly,

David R. Moeller

DPM:sr
Attach.

95 **PU-09-587** Filed: 5/16/2016 Pages: 5
Interim Bald Eagle Risk Minimization Strategy report

Allete, Inc.

David Moeller

Minnesota Power- Bison Wind Facility

Bald Eagle Intern Risk Minimization Strategy



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Minnesota Power currently owns and operates the 496.6 megawatt Bison Wind Energy Conversion Facility (facility) located north of New Salem, North Dakota. The Bison facility consists of 165 turbines across over 46,000 acres and is the largest wind facility in the state.

Minnesota Power is proud of its environmental commitment and continually seeks new ways to provide electricity with the least possible impact on the environment. Environmental stewardship is one of Minnesota Power's corporate values while providing affordable and reliable electricity to customers. Minnesota Power is committed to siting, designing, constructing and operating its wind facilities in a way that minimizes adverse environmental impacts consistent with State and Federal regulations.

As a responsible corporate citizen in the state of North Dakota, Minnesota Power is developing an Eagle Conservation Plan (ECP) for bald eagles in coordination with the US Fish and Wildlife Service (Service) for its Bison facility. The ECP will be developed for the entire Bison facility for an Incidental Take Permit (ITP) awarded by the Service to Minnesota Power.

In a proactive approach to bald eagle management, Minnesota Power has initiated this Bald Eagle Interim Risk Minimization Strategy (strategy) for its facility while its ECP is being developed. This strategy outlines the impact minimization measures that Minnesota Power has voluntarily adopted to minimize its potential impact to bald eagles while operating its facility. This strategy covers the existing Bison facility and does not include any wind facility projects under construction that are not affiliated with Minnesota Power.

Minnesota Power will implement a variety of Best Management Practices to reduce operational risks to bald eagles (and all raptor species). In addition, adaptive management strategies informed through post-construction monitoring and ECP development surveys may be incorporated to minimize and/or mitigate potential/perceived impacts. The following BMP's have been implemented as part of Minnesota Power's strategy for the Bison facility during operation:

- Management activities such as seeding forbs or maintaining rock piles that attract potential prey will be avoided.
- Parts and equipment which may be used as cover by prey will not be stored long term in the vicinity of wind turbines.
- Low level speed limits (<35 mph) will be maintained on all project developed access roads.
- Personnel will be trained to be alert for wildlife at all times, especially during low visibility conditions.
- Personnel, contractors, and visitors will be instructed to avoid disturbing eagles, especially during the breeding seasons and seasonal periods of stress.
- The Bison facility will maintain its existing Wildlife Incident Reporting System.
- Fire hazards will be reduced from vehicles and human activities (e.g., use spark arrestors on power equipment, avoid driving vehicles off roads, and allow smoking in designated areas only).
- Federal and state measures for handling toxic substances will be followed.
- Effects to wetlands and water resources will be minimized by following provisions of the Clean Water Act (1972).



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*Bald Eagle Interim Risk Minimization Strategy
Bison Wind Facility-New Salem, ND*

- Roads will be plowed during the winter so as not to impede ungulate movement. Snow banks can cause ungulates to run along roads, resulting in their colliding with vehicles. Roadside carcasses attract raptors, subjecting them to collision as well.
- Carcass searches on facility access road will be performed by facility personnel.

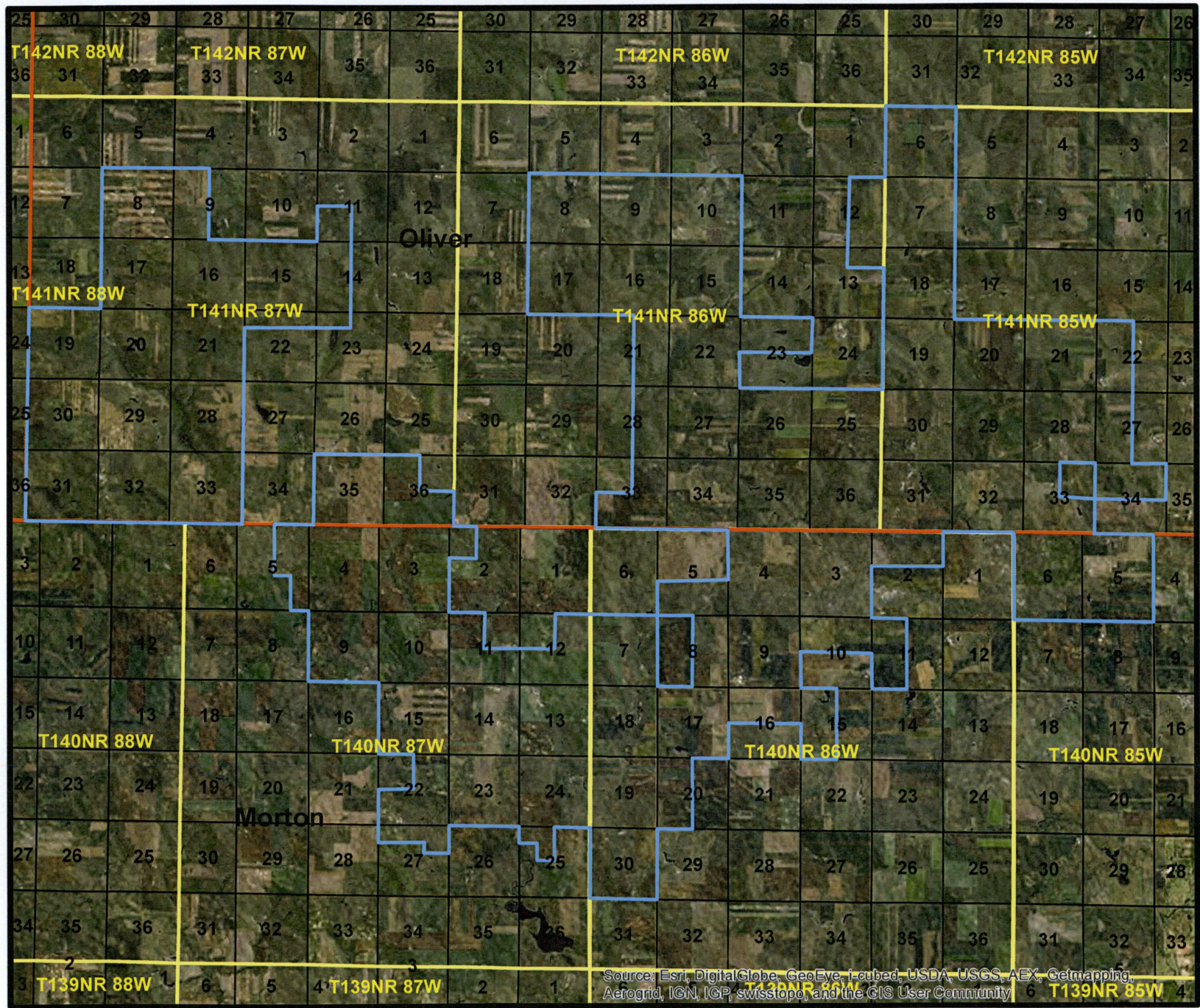
Minnesota Power will continue to regularly survey its existing wind turbines for avian and bat carcasses throughout operation. If any bald eagle (or other protected species) carcasses are identified, Minnesota Power will work with all applicable State and Federal regulatory entities and laws to ensure that correct protocol is followed.

By implementing this voluntary strategy Minnesota Power will minimize its potential impacts to bald eagles at its facility as well as minimize its exposure of violation of the Bald and Golden Protection Act during facility operation.

This strategy will not only minimize the facility's impacts to bald eagles but will also minimize impacts to other terrestrial wildlife species found around the facility further building on Minnesota Power's core value of environmental stewardship.

Minnesota Power- Eagle Conservation Plan Area

04/25/16



- Legend**
- Bison 1-4 Project Boundary
 - County
 - Townships
 - Sections



2 Miles



Source: Esri, DigitalGlobe, GeoEye, Earthstar, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community