



July 27, 2021

VIA E-MAIL

North Dakota Public Service Commission
c/o Steven Kahl, Executive Secretary
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505

**RE: 100 MW Clean Energy #1 Wind Project-Mercer & Morton Counties
Case No. PU-11-662**

Dear Mr. Kahl:

On July 6, 2021, in compliance with the North Dakota Public Service Commission's ("Commission") August 29, 2012 order, point 35, in the above referenced Case Number, as well as Item 1 in the Commission's June 15, 2021 Notice of Noncompliance, ALLETE Clean Energy ("Company") submitted the design specifications for the construction of the energy conversion facility. In that letter the Company noted that Item 2 in the Notice of Noncompliance would be submitted by August 15, 2021 and would request an applicable site permit. ALLETE Clean Energy was able to complete the Tree and Shrub Mitigation Specifications ("Specifications") ahead of what was previously communicated and hereby submits the attached in compliance with the Commission's March 13, 2019 Specifications. In addition, as noted in the Commission's June 15, 2021 Notice, the Company requests an amendment to the August 29, 2012 Order to instead comply with the Commission's March 13, 2019 simplified version of the Tree and Shrub Mitigation Specifications. Thank you for bringing that version to the Company's attention.

If you have any questions, or need additional information, please contact me at 218-723-3963 or dmoeller@allete.com.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller

DRM:th

Glen Ullin Energy Center Tree and Shrub Mitigation Plan Glen Ullin Energy Center Wind Project, North Dakota

To: North Dakota Public Service Commission
From: Daniel McCourtney, ALLETE Inc.
Date: July 23, 2021

Re: Tree and Shrub Mitigation Plan

BACKGROUND

The Glen Ullin Energy Center Wind Project located in Morton and Mercer Counties, ND, was constructed throughout 2019 with final close out completed in 2021. During construction, some trees and shrub were removed to facilitate construction. In accordance with the Certification Relating to Order Provision 21 of the ND Public Service Commission (PSC) Site Permit issued August 29, 2012 and the PSC Tree and Shrub Mitigation Specifications issued March 13, 2019, the Glen Ullin Energy Center respectfully submits this proposed Tree and Shrub Mitigation Plan for PSC review and approval.

Post construction tree and shrub surveys were performed by Western Ecosystems Technology Inc. on behalf of the Glen Ullin Energy Center in July 2021. The surveys identified that seven shrubs (all chokecherry) and 20 trees (14 siberian elms, 6 green ash) were removed during construction. A copy of the post construction survey report is included as Attachment A.

Two landowners were contacted to inquire whether they would prefer to have the mitigation plantings take place on their property or on an alternate mitigation site identified by the Glen Ullin Energy Center. In both cases, the landowners opted to use the Glen Ullin Energy Center's alternate mitigation site. A copy of the signed waivers are included in Attachment B.

Mitigation Plan

The Glen Ullin Energy Center proposes to mitigate all impacted chokecherry shrubs with seedlings of the same species. The tree species removed during construction consisted of both green ash and siberian elm (a non-native species in ND). The Glen Ullin Energy Center proposes to mitigate all impacted tree species with green ash seedlings to ensure that all tree and shrub mitigation species planted are native to ND.

All species will be planted at a ratio of at least 2:1 at Glen Ullin Energy Center's alternate mitigation site shown on Attachment C.

Planting is scheduled for spring 2022. Survival surveys will be conducted two years post planting and results will be filed with the PSC.

Attachment A

Post Construction Tree and Shrub Inventory



Attachment A

ENVIRONMENTAL & STATISTICAL CONSULTANTS

4007 State Street, Suite 109. Bismarck, North Dakota 58503
Phone: 701-250-1756 ♦ www.west-inc.com ♦ Fax: 701-250-1761

Date: July 14, 2021

To: Daniel McCourtney – ALLETE Clean Energy

From: Martin Piorkowski– Western EcoSystems Technology, Inc.

Subject: Glen Ullin Wind Project – Post-construction Tree and Shrub Inventory

INTRODUCTION

On June 24th, 2021, ALLETE Clean Energy (ALLETE) contracted Western EcoSystems Technology, Inc. (WEST) to conduct a post-construction tree and shrub inventory at the Glen Ullin Wind Energy Center (Project), in Mercer and Morton counties, North Dakota. Geographic Information System (GIS) files were provided by ALLETE for a post-construction survey and inventory effort to compare with pre-construction survey efforts to document any tree and/or shrub removal associated with the construction of the Project. This included what species and how many trees/shrubs (or stems) were removed during the construction of the phase.

METHODS

ALLETE provided GIS files for 133 pre-construction tree and shrub polygons for a post-construction survey and inventory effort. These polygons were mapped for field survey efforts. Field surveys included a visual inventory of all trees, shrubs, and stems within each polygon. The inventory documented the current species and status of trees and shrubs within each polygon and was then compared to pre-construction efforts provided by ALLETE. The following results summarize changes in either individual trees/shrubs or the stem count.

RESULTS

GIS exercises and desktop analyses were completed on June 28, 2021 with follow-up field surveys completed June 30 – July 2, 2021. Each of the 133 tree/shrub polygons provided by ALLETE were surveyed and inventoried. Seventeen polygons were identified as having some sort of tree or shrub removal. Seven shrubs and ten tree polygons (Table 1) were altered during construction removing the individuals. In total, seven shrubs and 20 trees were removed. Figure 1 displays the results of the inventory surveys indicating the polygons where tree/shrub removal occurred.

Attachment A

Glen Ullin Wind Energy Center – Post-construction Tree and Shrub Inventory

Table 1. Results of post-construction tree and shrub inventories at the Glen Ullin Wind Energy Center, Mercer and Morton counties, North Dakota.

ID	Scientific Name	Common Name	Individual or Clonal	Pre-Con # of Individuals	Pre-Con # of Stems	Planted or Volunteer	Tree or Shrub	Post-Con # of Individuals	Post-Con # of Stems	Post-Con Notes
27	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	30	Volunteer	Shrub	0	0	Total Removal
30	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	5	Volunteer	Shrub	0	0	Total Removal
45	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	15	Volunteer	Shrub	0	0	Total Removal
44	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	50	Volunteer	Shrub	0	0	Total Removal
42	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	25	Volunteer	Shrub	0	0	Total Removal
43	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	8	Volunteer	Shrub	0	0	Total Removal
50	<i>Prunus virginiana</i>	Chokecherry	Clonal	1	7	Volunteer	Shrub	0	0	Total Removal
59	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
60	<i>Ulmus pumila</i>	Siberian Elm	Individuals	4	0	Volunteer	Tree	0	0	Total Removal
62	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
61	<i>Ulmus pumila</i>	Siberian Elm	Individuals	2	0	Volunteer	Tree	0	0	Total Removal
63	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
64	<i>Ulmus pumila</i>	Siberian Elm	Individuals	2	0	Volunteer	Tree	0	0	Total Removal
65	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
66	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
67	<i>Ulmus pumila</i>	Siberian Elm	Individuals	1	0	Volunteer	Tree	0	0	Total Removal
79	<i>Fraxinus pennsylvanica</i>	Green Ash	Individuals	36	0	Planted	Tree	30	0	6 Individuals removed

Pre-Con = Pre-Construction, Post-Con = Post-Construction

Attachment A

Glen Ullin Wind Energy Center – Post-construction Tree and Shrub Inventory

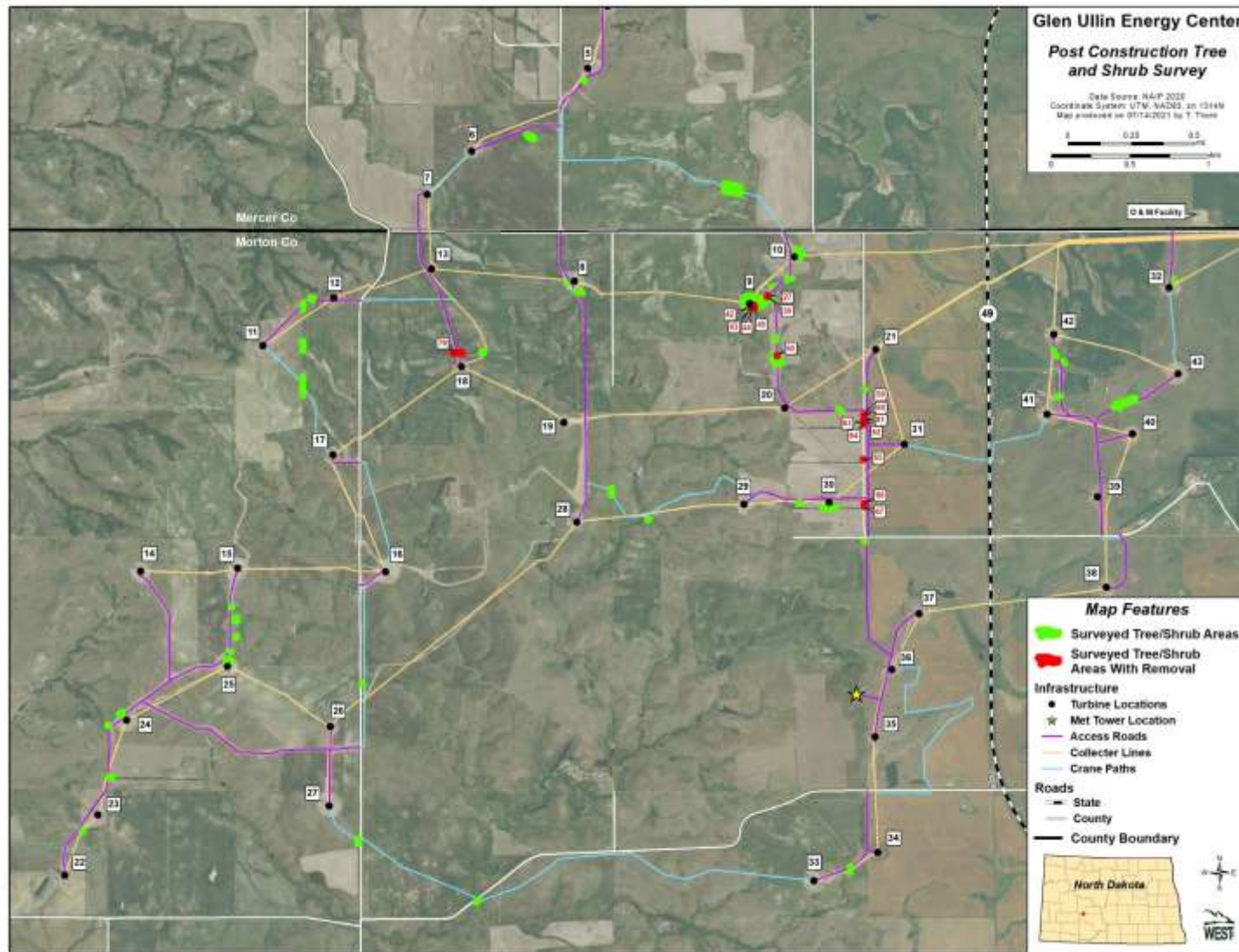


Figure 1: Changes in tree and shrub inventories between pre-construction and post-construction inventories at the Glen Ullin Wind Energy Center, Mercer and Morton counties, North Dakota.

Attachment B

Signed Landowner Waivers



July 16, 2021

Dear Joan Kinnischtzke,

As you are already aware, Glen Ullin Energy Center has obtained an easement from you and has constructed a wind energy project that runs across your ownership. As part of the permitting requirements between Glen Ullin Energy Center and the North Dakota Public Service Commission, all shrubs and trees that were removed during construction of the wind farm are required to be replanted at a 2:1 ratio.

During construction of the wind farm some shrubs and/or trees were removed from your property. Glen Ullin is required by the North Dakota Public Service Commission to replace every shrub/tree removed at a 2:1 ratio. We realize that in many cases land owners/grantors of easement do not want the removed shrubs/trees reestablished on their property. Therefore, in working in good faith with the Public Service Commission Glen Ullin has two options:

- 1) Glen Ullin Energy Center can replant the removed shrubs back on to your own property.
- (or)
- 2) Glen Ullin Energy Center can replant the removed shrubs at their own facility on their own land located away from your ownership.

Glen Ullin Energy Center is willing to work with all affected land owners on either course of action.

If you would prefer to have the shrubs replanted at a different location that is owned by Glen Ullin Energy Center (option #2 above) please sign the enclosed form and return it in the enclosed envelope.

Please take some time to think about which option would work best for you. If you have any questions please give me a call at you convenience at 1-218- 355-3590 or I can be reached electronically at dkellner@alletecleanenergy.com. Thank you for your time.

Best regards,

Mitchell Bettenhausen
ACE Lead Wind Technician
701 348 3398



July 16, 2021

Dear Mark and Lori Kottre,

As you are already aware, Glen Ullin Energy Center has obtained an easement from you and has constructed a wind energy project that runs across your ownership. As part of the permitting requirements between Glen Ullin Energy Center and the North Dakota Public Service Commission, all shrubs and trees that were removed during construction of the wind farm are required to be replanted at a 2:1 ratio.

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Please take some time to think about which option would work best for you. If you have any questions please give me a call at you convenience at 1-218- 355-3590 or I can be reached electronically at dkellner@alletecleanenergy.com. Thank you for your time.

Best regards,

Mitchell Bettenhausen
ACE Lead Wind Technician
701 348 3398

Attachment C





Alternate Mitigation Site

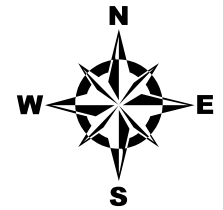
Glen Ullin Energy Center- Alternate Tree and Shrub Mitigation Site

Attachment C

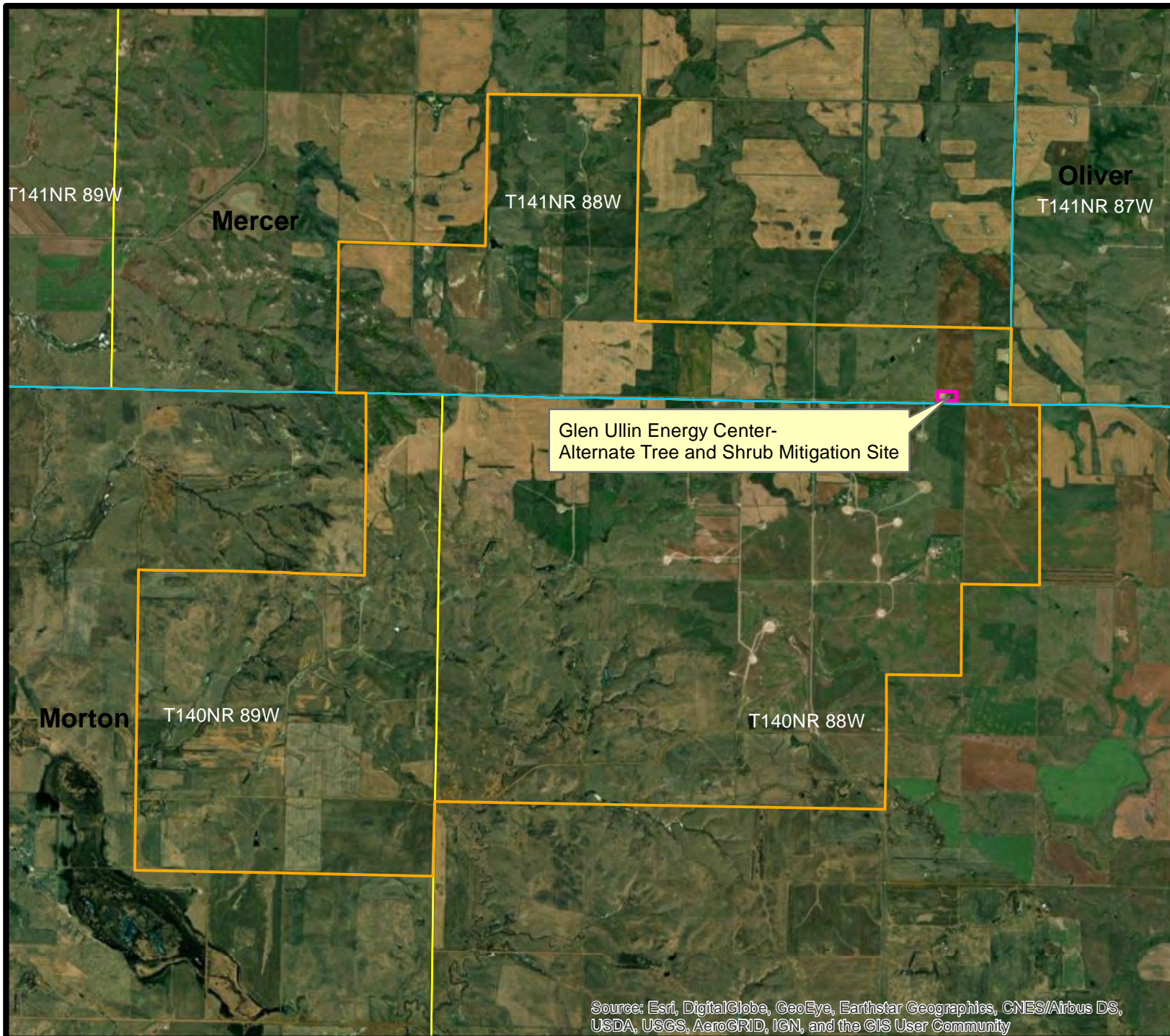
07/23/21

Legend

-  GUEC Alternate Mitigation Site
-  GUEC Project Boundary
-  County Boundary
-  Township Lone



1.5 Miles



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

