

September 19, 2023

*Via Electronic Mail & U.S. Mail*

Mr. Adam Renfandt  
Public Utilities Analyst  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, North Dakota 58505-0480  
[arenfandt@nd.gov](mailto:arenfandt@nd.gov)  
[ndpsc@nd.gov](mailto:ndpsc@nd.gov)


**In re: Northern Divide Wind, LLC  
Northern Divide Wind Energy Center  
Northern Divide 345-kV Transmission Line  
Case Nos. PU-19-376 & PU-19-377  
Our File No. 035218-000045**

Dear Mr. Renfandt:

On behalf of Northern Divide Wind, LLC, please find enclosed for filing in Case Nos. PU-19-376 and PU-19-377 five copies of Northern Divide Wind, LLC's letter supplementing its Final Tree and Shrub Mitigation Report filed on August 25, 2023.

Please feel free to contact me with any questions. Thank you.

Sincerely,



Casey A. Furey

CAF/lh

Enc.

cc: Tracy Davis (via e-mail)

208 PU-19-376 Filed 09/19/2023 Pages: 4  
Letter Supplementing the Final Tree and Shrub Mitigation Report Filed on August 25, 2023  
Northern Divide Wind, LLC  
Casey Furey, Crowley Fleck, PLLP  
200 PU-19-377 Filed 09/19/2023 Pages: 4  
Letter Supplementing the Final Tree and Shrub Mitigation Report Filed on August 25, 2023  
Northern Divide Wind, LLC  
Casey Furey, Crowley Fleck, PLLP

**Northern Divide Wind, LLC  
700 Universe Blvd.  
Juno Beach, FL 33408**

September 19, 2023

Mr. Steve Kahl  
Executive Director  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
[ndpsc@nd.gov](mailto:ndpsc@nd.gov)

RE: Final Tree and Shrub Mitigation Report  
Northern Divide Wind, LLC  
Case Nos. PU-19-376 and PU-19-377

Dear Mr. Kahl:

On August 25, 2023, Northern Divide Wind, LLC (“Northern Divide”) filed its Final Tree and Shrub Mitigation Report in the above-captioned cases for the Northern Divide Wind Energy Center and the Northern Divide 345 kilovolt (“kV”) Transmission Line (collectively, the “projects”), describing its compliance with the Tree and Shrub Mitigation Plan (“Plan) approved by the North Dakota Public Service Commission (“Commission”) on April 14, 2021. Northern Divide submits this follow-up letter to provide additional information regarding its tree and shrub mitigation efforts to date.

Northern Divide retained Environmental Consulting & Technology, Inc. (“ECT”) to develop the Plan. The purpose of the Plan was to create sustainable plantings appropriate for local growing conditions to provide long-term benefits to landowners, farmers, ranchers, the community, wildlife, and the environment. The Plan was developed in consultation with impacted landowners and the local Soil Conservation District office in accordance with the United States Department of Agriculture (“USDA”)-Natural Resource Conservation Service (“NRCS”)-North Dakota Field Office Technical Guide: Windbreak and Woodland Tree Care and Management.

A total of 5,072 trees and shrubs were removed during construction. The Plan provided that trees and shrubs would be replaced at a minimum 2:1 ratio, with a minimum of 10,144 trees and shrubs to be replanted. However, as noted in Northern Divide Wind’s Final Tree and Shrub Mitigation Report, in order to maximize the survival rates, Northern Divide planted a total of 11,006 trees and shrubs (for an additional 862 trees and shrubs above the 2:1 ratio). Planting occurred in May 2021. To date, the replanting effort has met a 54.76% survival rate. The table below provides an inventory of the trees and shrubs planted:

<b>Landowner</b>	<b>Total Planted</b>	<b>Year 1 Surviving</b>	<b>Year 2 Surviving</b>	<b>Year 2 Percent Success</b>
Douglass Ness	1,926	765	1,439	79.81 %
Darrell Dihle	1,925	1,474	88	34.11%
Alex Brodal	1,926	1,719	1,633	84.79 %
Jeff Larson	1,357	1,317	634	58.01 %
James Elsbernd	1,512	1,260	1,044	69.05 %
Embarc Farm LLP	1,195	688	311	26.03 %
Rodney Olsen	528	367	224	51.85 %
LeRoy and Marcia Schroeder	94	61	20	21.28 %
Brad Dibble	222	143	61	27.48 %
Hank's Difficult Decisions	88	86	0	0
Norman Westernness	185	183	101	79.53 %
Linda and Ower Enget	48	Not counted <sup>a</sup>	Not counted <sup>a</sup>	N/A
<b>Total</b>	<b>11,006</b>	<b>8,063</b>	<b>5,555</b>	<b>63.49 %</b>
<b>Total Required by Plan</b>	<b>10,144</b>			<b>54.76%</b>

<sup>a</sup> No visual survey conducted during monitoring, due to landowner/access issues

Northern Divide submits that the replanting effort has successfully achieved the purpose of Northern Divide's Mitigation Plan, in particular given the drought conditions that have been experienced in the project area since the planting occurred in May 2021. Specifically, the six months after planting saw a 2.5-inch precipitation deficit from the 20-year mean precipitation in Burke County, North Dakota, resulting in adverse growing conditions to the trees and shrubs during a critical time in their initial growth. To give the trees and shrubs a better chance of survival, Northern Divide's consultant, ECT, added supplemental nutrient-rich potting soil and a synthetic moisture retaining polymer around the roots during the planting of each tree or shrub in Year 1 and Year 2. Landowners receiving trees and/or shrubs were advised to provide supplemental watering to increase survivability. Additionally, after July 2021 precipitation data was reviewed, ECT conducted a supplemental watering effort for all plantings in August 2021, in an attempt to supplement the low precipitation experienced in Year 2.

These efforts promoted plantings that were able to withstand adverse drought and growing conditions. The overall survivability of plantings, despite the constraints faced during the growing seasons, demonstrates the sustainable nature of Northern Divide's planting efforts. For these reasons, Northern Divide submits its planting efforts were not only appropriate for the growing conditions faced, but they will provide long-term benefits to landowners, wildlife, and the environment. Thus, Northern Divide has fulfilled the goals of its Tree and Shrub Mitigation Plan and satisfied the criteria set forth in the Commission's Tree and Shrub Mitigation Specifications.

North Dakota Public Service Commission  
September 19, 2023  
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Sincerely,

*/s/ Alexander K. Vineyard*

Alexander Vineyard  
Regional Wind Site Manager  
NextEra Energy Resources, LLC

On behalf of Northern Divide Wind, LLC