



July 11, 2023

ND Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480

RE: PU-23-176: Luverne Wind Farm, Steele County, North Dakota

Mr. Kahl,

The North Dakota Game and Fish Department (Department) appreciates Otter Tail Power Company's commitment to maintaining efficient renewable energy projects while also working to ensure minimal impacts to wildlife and the habitats they depend on. Based on discussions between the Department, The US Fish and Wildlife Service, and the developer, it appears there will be little to no new disturbance on the landscape; however, the Department would like to reiterate the following recommendations as general considerations for all repower projects in North Dakota:

1. Avoid disturbance to native landscapes:
  - a. Native prairie (prairie that has not been plowed or broken in any way) is the most endangered ecosystem in North Dakota and, as we are a grassland state, many of our native species are linked to prairie. Disturbance, fragmentation, and loss of native prairie have adversely impacted a wide variety of species and these negative impacts will only continue to compound as more development takes place on the landscape. Further, any impact to native prairie is considered permanent, as once it is broken, it can never be unbroken. Therefore, the Department recommends avoiding impact to native landscapes, whether the disturbance on that landscape is only temporary (i.e., temporary crane paths or construction yards).
2. If habitat disturbance cannot be avoided, it should be reseeded using a diverse, native seed mix using the parameters below:
  - i. 1 cool-season bunch grass
  - ii. 1 cool-season rhizomatous grass
  - iii. 1 warm-season bunch grass
  - iv. 1 warm-season rhizomatous grass
  - v. 3 forbs with early summer bloom period
  - vi. 3 forbs with mid-summer bloom period
  - vii. 3 forbs with late summer bloom period
3. If any new turbines are added to the project, a new impact analysis should be conducted. The Department's *Wind Energy Development in North Dakota: Best Management Practices (2021)* can be found here: <https://gf.nd.gov/node/4800>, and includes information on conducting both a risk analysis and an impact analysis which

Governor  
Doug Burgum

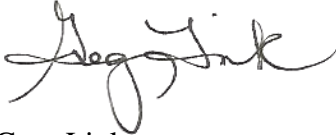
Director  
Jeb Williams

Deputy Director  
Scott A. Peterson

- will assist in placing new infrastructure in areas with minimal impacts to wildlife and the habitat they depend on.
4. Equipment and part disposal should be done in accordance with any recommendation made by the Department of Environmental Quality and outside of areas of undisturbed native habitats.

Thank you for your consideration on the matters above.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Link". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "Link".

Greg Link  
Chief, Conservation and Communications Division

Governor  
Doug Burgum

Director  
Jeb Williams

Deputy Director  
Scott A. Peterson