



Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St. Paul, MN 55155-4040

March 12, 2025

Consumer Affairs Office
Minnesota Public Utilities Commission
127 7th Place East, Suite 350
Saint Paul, MN 55101-2147

RE: In the Matter of Request for Amendments to Plum Creek Wind Farm, LLC Certificate of Need, Site Permit, and Route Permit for an up to 414 MW Large Wind Energy Conversion System and 345 kV Transmission Line in Cottonwood, Murray, and Redwood Counties, Minnesota.
Docket No. IP-6997/CN-18-699, WS-18-700, and TL-18-701

Dear Consumer Affairs Office,

The Minnesota Department of Natural Resources (DNR) has reviewed the request for amendments Energy Environmental Review and Analysis (EERA) comment letter for the Plum Creek Wind Project (Project), proposed by Plum Creek Wind Farm, LLC (Applicant). Our agency supports the exiting permit conditions and EERA's recommended additional permit conditions addressing natural resource concerns. Our agency offers the following comments:

Natural Heritage Review

A Natural Heritage Review (MCE 2024-00281) has been completed for the Project. The letter includes measures to minimize or avoid impacts to state-listed species and other rare resources. This includes, but is not limited to, the following:

MBS Sites of Biodiversity Significance and DNR Native Plant Communities

Minnesota Biological Survey (MBS) Sites of Biodiversity Significance and DNR Native Plant Communities have been documented in the vicinity of the Project. The DNR requests a special permit condition that the Applicant shall develop a mitigation plan in cooperation with the DNR to avoid, minimize, and mitigate potential impacts to MBS Sites and DNR Native Plant Communities in Section 6 of Ann Township (T108N, R38W) during construction and operation of the transmission line.

Facility Lighting

The DNR recommends including a special permit condition, similar to TL-23-159, to utilize downlit and shielded lighting and minimize blue hue to reduce harm to birds, insects, and other animals. Potential project impacts related to illuminated facilities can be avoided or minimized by using shielded and downward facing lighting and lighting that minimizes blue hue.

Dust Control

The DNR recommends including a special permit condition, similar to TL-23-159, to avoid products containing calcium chloride or magnesium chloride, which are often used for dust control. Chloride products that are released into the environment do not break down and instead accumulate to levels that are toxic to plants and wildlife.

Wildlife-Friendly Erosion Control

Due to entanglement issues with small animals, the DNR recommends including a special permit condition, similar to TL-23-159, that erosion control blankets be limited to “bio-netting” or “natural netting” types, and specifically not products containing plastic mesh netting or other plastic components. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in their matrix strength. These loose fibers could potentially re-suspend and make their way into waterways.

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Plum Creek Wind Project. Please contact me if you have questions about our agency’s comments.

Sincerely,

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Attachments: Natural Heritage Review Letter

Equal Opportunity Employer