

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

March 13, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East
St. Paul, MN 55101

RE: In the Matter of Lake Charlotte Solar, LLC's joint application for the Lake Charlotte 150-MW Solar Facility and 150-MW Lake Charlotte Battery Energy Storage System (BESS) located in Rutland Township, Martin County, Minnesota. Docket Numbers: GS-25-206; ESS-25-205

Ms. Bergman,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) and draft site permits (DSP) for Lake Charlotte Solar (Applicant) to construct a 150 MW solar facility and a 150 MW battery energy storage system (BESS). Based on the review of the EA and DSP, the DNR offers the following comments.

Surface Waters

The DNR appreciates the Commission's consideration by including the DNR as a party the permittee must consult regarding surface waters in special condition 5.9 of the DSP. The DNR's concerns regarding the project's impacts to surface waters are sufficiently addressed in special condition 5.12 and 5.13 of the DSP. Our agency respectfully requests to remove the DNR from special condition 5.9.

Security Fencing

The EA states the largest impact associated with solar facilities are security fences. The EA states the fence design proposed by the Applicant may increase the risk of large wildlife, like deer, from getting trapped within the solar facility. The EA also indicates the project's infrastructure may impede deers' ability to exit the project since wildlife might not be able to reach the speed necessary to jump the security fence. Due to these concerns, the DNR requests the Applicant adheres to our agency's fencing guidance to construct a fence that reaches a height of at least 10 feet. Under the Applicant's proposed fence design, project operators would be responsible for safely removing deer that enter the solar facility without harassment, which includes chasing. Conservation Officers and DNR Wildlife staff will

not be deployed to assist with removal. The DNR will also not issue a permit for taking if the woven wire fence is lower than 10 feet. Our agency supports permit condition 4.3.32 of the DSP requiring the permittee to design the final security fence in coordination with the DNR.

Grant-in-Aid Trail

The EA indicates that segment #161 of the Prairieland Trail crosses through the project's Land Control Area. The development and maintenance of the snowmobile trail are financially assisted by Minnesota's grant-in-aid program, which is administered by the DNR. Coordination with local snowmobile clubs is strongly encouraged to allow time to accommodate changes to the snowmobile trail route. The DNR supports special condition 5.8 of the DSP as written.

Vegetation Management Plan

The DNR supports standard conditions 4.3.16 and 4.3.17 of the DSP as written. The DNR's review of the Applicant's VMP identified non-native plant species and species that are not compatible with the soil at the project area. The DNR advises against planting non-native species because they can outcompete native plants and forbs. Planting species that are not suitable to the site conditions at the project can also inhibit successful vegetation establishment. Our agency commends the Applicant for committing to the Board of Water and Soil Resources' Habitat Friendly Solar Gold Standard for the solar array, permitter, and wetland seed mixes. The DNR looks forward to continued coordination on the VMP to ensure successful vegetation establishment.

Facility Lighting

The DNR supports special condition 5.11 as written.

Dust Control

The DNR supports special condition 5.12 as written.

Wildlife Friendly Erosion Control

The DNR supports special condition 5.13 as written.

The DNR appreciates the opportunity to comment on the Lake Charlotte Solar project. Please contact me if you have questions.

Sincerely,

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CC: Haley Byron, Minnesota DNR

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