



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

May 17, 2024

Public Advisor  
Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**RE: In the Matter of the Application of Xcel Energy for a Site Permit for the up to 250 MW Sherco 3 Solar Energy Generating System in Sherburne County. PUC Docket Number: E-002/GS-23-217**

Public Advisor:

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment for the Sherco 3 Solar Energy project in Sherburne County. Our agency offers the following comments.

### **Facility Lighting**

The DNR recommends a special permit condition to minimize lighting impacts associated with substations and inverters by using lighting that is shielded, downward-facing, and minimizes blue hue. LED lighting is often high in blue light, which is harmful to birds, insects, and other animals. A similar special permit condition was included for the substation associated with the Frazee to Erie 115 kV Transmission Line Project (Docket TL-20-423): *Permittees must use shielded and downward facing lighting and LED lighting that minimizes blue hue at the project substation. Downward facing lighting must be clearly visible on the plan and profile submitted for the project.*

### **Dust Control**

Products containing calcium chloride or magnesium chloride 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. The DNR recommends a permit condition requiring the permittee to avoid using dust control products containing chloride.

### **Wildlife-Friendly Erosion Control**

Section 4.7.7.2 of the EA states that the Draft Site Permit (Appendix C - section 5.2), includes a special condition for the use of wildlife friendly erosion control. However, section 5.2 of the Draft Site Permit includes a special condition for snowmobile trails. The DNR did find discussion of the use of wildlife-friendly erosion control within

the Draft Site Permit. The DNR recommends that the Draft Site Permit be updated to include a condition requiring the use of use of wildlife friendly erosion control, as identified in the EA.

The DNR appreciates the opportunity to comment on the Sherco 3 Solar Energy project. If you have questions about our agency's comments, I may be reached at [becky.horton@state.mn.us](mailto:becky.horton@state.mn.us).

Sincerely,

*/s/ Becky Horton*

Planner Principal

Cc: Suzanne Steinhaur, Minnesota Department of Commerce  
Melissa Collins, Minnesota Department of Natural Resources  
ERDB 20220206