

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

March 21, 2025

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 Joint Application of Northern Crescent Solar LLC for a Solar Energy Generating System Site Permit and a Battery Energy Storage System Site Permit for the up to 150 MW Northern Crescent Solar and 50 MW Storage Project in Faribault County, Minnesota: PUC Docket Number: IP-7135/GS-22-57 and IP-7135/ESS-24-238**

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for the Northern Crescent Solar, LLC (Applicant) to construct a 150 MW solar energy generating system and a 50 MW battery energy storage system (Project). Based on the review of the EA, the DNR offers the following comments:

### **Fencing**

The EA describes the security fencing design as an agricultural woven wire fencing topped with smooth wire for a total height of approximately 10 feet. The DNR appreciates the security fencing will be designed in accordance with our agency's recommended guidance. The DNR supports section 4.3.31 of the sample site permit which would direct the Applicant to coordinate the final fencing design with the DNR and the Department of Commerce. The DNR anticipates the final security fencing plan to be consistent with the fencing design described in the EA.

### **Facility Lighting**

The EA describes the Project's lighting as down lot and motion activated. To ensure lighting impacts are minimized, the DNR recommends a special permit condition that requires shielded and downward

facing lighting and lighting that minimize blue hue. LED lighting is often high in blue light, which is harmful to birds, insects, and other animals. The DNR recommends the following special permit condition: *The permittee shall use motion activated, down-lit, and shielded lighting that minimizes blue hue. Downward facing lighting must be clearly visible on the site plan submitted for the project.*

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

The EA states plastic erosion control can cause injuries and death due to entanglement. Due to this concern, the DNR recommends erosion control blankets be limited to “bio-netting” or “natural netting” types, and specifically not products containing plastic mesh netting or other plastic components. Furthermore, hydro-mulch products may contain small synthetic (plastic) fibers and malachite green dye. Synthetic fibers and malachite green dye may enter water bodies and pose toxicity concerns to fish and wildlife. The DNR recommends the following special permit condition: *The permittee shall use erosion control materials that do not contain plastic or synthetic fibers or malachite green dye.*

### **Dust Control**

The EA states that the project will generate fugitive dust from travel on unpaved roads, grading, and excavation. The EA discusses watering exposed surfaces at the Project site as a standard construction practice for reducing fugitive dust. Products containing calcium chloride or magnesium chloride are commonly used dust control agents. Chloride products that are released into the environment do not break down and accumulate to levels that are toxic to plants and wildlife. To ensure chloride products are not used at the Project site, the DNR recommends a special permit condition which was included in the permitted Byron Solar Project (Docket GS-20-763): *The Permittee shall utilize non-chloride products for onsite dust control during construction.*

### **Vegetation Management Plan**

The DNR recommends continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project’s Vegetation Management Plan (VMP). The DNR supports section 4.3.17 of the draft site permit to require the Applicant to develop a VMP in coordination with the VMPWG. Our agency also supports section 4.3.16 of the sample permit application to encourage the Applicant to meet the standards of the Minnesota Habitat Friendly Solar Program by submitting the necessary documentation with the Board of Water and Soil Resources to ensure compliance with the program’s standards. The final VMP should be developed in accordance with the DNR’s recently revised [Prairie Establishment & Maintenance Technical Guidance for Solar Projects](#). The VMP should include a mix of native grasses and forbs that will be planted throughout the entire Project Area to minimize erosion, create pollinator and wildlife habitat, and improve soil health.

The DNR appreciates the opportunity to comment on the Northern Crescent Solar project. Please contact me if you have questions about the DNR’s comments.

Sincerely,

Martin Donovan

Energy Review Planner

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CC: Haley Byron, Minnesota Department of Natural Resources

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