



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

May 2, 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 Application of Coneflower Energy, LLC for a Site Permit for the up to 235 MW Coneflower Solar Project in Lyon County, Minnesota
PUC Docket Number: IP-7131/GS-24-215

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for Coneflower Energy, LLC (Applicant) to construct a 235 MW solar energy generating system (Project). Based on the review of the EA, the DNR offers the following comments:

Security Fencing

The EA describes the security fence design as a seven-foot-tall woven wire fence topped with 1 foot of smooth wire. Our agency advises the security fence reaches a minimum height of 10 feet to prevent large wildlife from entering the solar facility, as detailed in the DNR's documents, [Fencing Handbook For 10 ft Woven Wire Deer Exclusion Fence](#) and [Commercial Solar Siting Guidance](#). The Applicant should note that the DNR will not issue a white-tailed deer removal permit for facilities with woven wire fences lower than 10 feet. The DNR supports section 4.3.32 of the draft site permit requiring the Permittee to design the final security fence in coordination with the DNR and the Department of Commerce. The DNR also supports special condition 5.13 which directs the Permittee to coordinate with the DNR to finalize a permeable fence design for small and mid-size animals and special condition 5.14 requiring the Permittee to coordinate with our agency to install visibility markers on the security fence to minimize the collision of low-flying birds.

Facility Lighting

The EA indicates the Applicant will install motion- and switch- activated lighting around the Project. The DNR supports special condition 5.10 which directs the Permittee to install motion-activated and down-lit lighting.

Dust Control

The EA states the Project will generate fugitive dust due to soil movement and vehicles travelling on unpaved roads. The EA also discusses the adverse impacts chloride, a common dust suppression agent, has on aquatic wildlife. The DNR supports special condition 5.11 requiring the Permittee to use dust suppression agents that do not contain chloride.

Wildlife-Friendly Erosion Control

The EA discusses how plastic erosion control can injure or kill aquatic wildlife by entanglement. Additionally, the EA addresses how hydro-mulches containing malachite green dye and synthetic (plastic) fibers pose toxicity concerns to wildlife. Due to these concerns, the DNR supports special condition 5.12 which requires the Permittee to use wildlife-friendly erosion control materials that do not contain plastic, synthetic fibers, or malachite green dye.

State-listed Species

The DNR supports a special condition to require the Applicant to complete coordination with the DNR regarding rare species, including following the stated avoidance measures and the Takings Permit process if needed, before Project activities begin. Our agency proposes the following permit condition to ensure compliance with state endangered species laws:

The Permittee will comply with applicable Minnesota Department of Natural Resources requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134). The Permittee shall keep records of compliance with this section and provide them upon the request of Department of Commerce or Commission staff.

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 4.3.16 of the draft site permit encouraging the Applicant to meet the standards of the Minnesota Habitat Friendly Solar Program and requiring native perennial vegetation to create habitat and improve soil quality. Our agency also supports section 4.3.17 of the draft site permit to require the Applicant to develop a VMP in coordination with the VMPWG. The final VMP should be developed in accordance with the DNR's [Prairie Establishment & Maintenance Technical Guidance for Solar Projects](#).

The DNR's review of the Applicant's VMP identified limited diversity of seed mixes and a high use of broadcast herbicide application. The DNR is concerned the Applicant's VMP will not satisfy the requirements established in section 4.3.16 of the draft site permit or our agency's technical guidance. The Applicant also intends to install modules that will be a minimum of 18-inches above grade at maximum tilt. Planning for a module height greater than 18-inches above grade ensures native plant species can successfully establish. The DNR and other members of the VMPWG look forward to future coordination on the Applicant's VMP.

The DNR appreciates the opportunity to comment on the Coneflower Energy project. Please contact me if you have questions about the DNR's comments.

Sincerely,

Martin Donovan
Energy Review Planner
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651-259-5402

Attachments: Natural Heritage Review Letter

CC: Haley Byron, Minnesota Department of Natural Resources

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