



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

August 31, 2022

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

**RE: In the Matter of the Application for a Site Permit Amendment to Repower the 200 MW Pleasant Valley Large Wind Energy Conversion System in Dodge and Mower Counties
PUC Docket Number: E-002/WS-09-1197**

Dear Consumer Affairs Office,

The Minnesota Department of Natural Resources (DNR) has reviewed the Pleasant Valley Wind repower project in Dodge and Mower counties. Our agency offers the following comments:

Wildlife Friendly Erosion Control

Due to entanglement issues with small animals, the DNR recommends 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. Furthermore, hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. The DNR recommends a special permit condition requiring the use of wildlife friendly erosion control akin to the condition included for the Louise Solar project (Docket WS-20-647): *The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.*

Snowmobile Trail

The Minnesota Legislature has delegated the responsibility of administering a cost-sharing program for the development and maintenance of snowmobile trails to the DNR. Section 8.8.1 of the permit application states that the Mower County Management Snowmobile Trail will be crossed by a public intersection improvement workspace that intersects a small portion of the trail. There may be a temporary impact to the trail, depending on construction timing. The best way to avoid impacts to the snowmobile trail would be to avoid construction activities from December 1 through April 1. Statewide snowmobile routes are finalized by mid-summer and are not normally changed prior to the winter recreation season. Snowmobilers incorporate the route maps as Apps onto mobile devices and any route changes can cause safety issues. As

stated in Section 8.8.2, the applicant will consult with snowmobile groups on construction timing and to determine if rerouting of the trail is needed and/or to facilitate any modifications. To ensure trail user safety, the DNR recommends a permit condition requiring the permittee to consult with snowmobile groups regarding potential impacts to the Mower County Management Snowmobile Trail. A similar condition was included in Sherco Solar's proposed site permit (Docket GS-21-191).

Prairie Protection and Management Plan

The draft site permit requires the permittee to prepare a Prairie Protection and Management Plan in consultation with the DNR if native prairie is identified within the site boundaries. The site permit amendment application states that the applicant will conduct a survey of the project area to identify native prairie, including unmapped native prairie. Our agency looks forward to reviewing the Prairie Protection Management Plan when it becomes available.

The DNR appreciates the opportunity to comment on the Pleasant Valley Wind repower project. Our agency advises that any DNR permits or licenses required for the project will not be granted until the PUC has issued an approved permit for this project. If you have questions about our agency's comments, I may be reached at 651-259-5078 or cynthia.warzecha@state.mn.us.

Sincerely,

/s/ Cynthia Warzecha

Energy Projects Planner

CC: Scott Ek, Minnesota Public Utilities Commission
Rich Davis, Minnesota Department of Commerce - EERA
Matt Langan, Xcel Energy
Joanne Boettcher, Minnesota Department of Natural Resources

Equal Opportunity Employer