



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

June 8, 2021

Jamie MacAlister, Environmental Review Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul MN 55101

**RE: In the Matter of the Application of Louise Solar Project, LLC for a Site Permit for the 50 MW Louise Solar Project in Mower County, PUC Docket Number: IP7039/GS-20-647**

Dear Ms. MacAlister,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application for the Louise Solar project. Our agency offers the following comments and recommendations.

#### Security Fencing

Section 5.0 of the site permit application references a fencing design described in the DNR's *Commercial Solar Siting Guidance*. Our agency would like to clarify that this guidance document, including fencing recommendations, is being updated to reflect current best practices and specifications. As such, our agency cautions that a 6-foot fence is not high enough to exclude deer and placing smooth strand wire on top of a 6-foot fence may result in entanglement. An 8-foot fence would exclude most deer, although some deer may be able to clear the fence. Deer that jump the fence may not be able to jump back out, thus becoming trapped within the solar facility. In this scenario, deer egress areas in the fencing design could allow deer a safe exit. To ensure complete deer exclusion from the solar facility, the *DNR's Fencing Handbook For 10 ft Woven Wire Deer Exclusion Fence* recommends 10-foot fencing.

#### Vegetation Management Plan

Our agency understands that the applicant is revising the Vegetation Management Plan, submitted with the site permit application, based on the *Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities*. It is our expectation that the DNR, along with other relevant state agencies, will have the opportunity to review the revised plan prior to finalization.

The DNR appreciates the opportunity to comment on the Louise Solar project. If you have questions about our agency's comments, I may be reached at 651-259-5078 or [cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us).

Sincerely,

/S/ Cynthia Warzecha  
Energy Projects Planner

CC: Michael Kaluzniak, Minnesota Public Utilities Commission  
Cezar Panait, Minnesota Public Utilities Commission  
Scott Wentzell, EDF Renewables, Inc.  
Joanne Boettcher, Minnesota Department of Natural Resources  
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