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June 9, 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 Certificate of Need and a Site Permit for the 50 MW Louise Solar Project in Mower County, Minnesota
PUC Docket Numbers: IP7039/CN-20-646, IP7039/GS-20-647

Dear Ms. MacAlister,

On May 10th, 2021, the Minnesota Public Utilities Commission (PUC) issued a Notice of Public information and Environmental Review Scoping Meeting which includes a public comment period regarding the scope of the environmental report (ER) and the draft site permit that is under consideration with respect to the 50 MW Louise Solar Project, LLC (Louise Solar) solar energy generating system in Mower County, Minnesota. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

The Louise Solar, LLC application already includes language specifying that the Permittee shall acquire all federal, state, local, and tribal government permits and approvals necessary for construction and operation of the Project. For any areas where the project intersects state highway rights of way, Louise Solar should adhere to MnDOT's Utility Accommodation Policy - [MnDOT Accommodation Policy](#).

Section 3.1.5 of the application states that site access points will be from 150th Avenue, 690th Avenue, 140th Street, 680th Street and Trunk Highway (TH) 56. Appendix A Maps 1-4 do not seem to illustrate new, direct site access from TH 56. If Louise Solar is referring to the existing access to the existing substation, MnDOT has no issue with this claim. However, if Louise Solar is referring to any NEW access to the proposed site via TH 56, we would suggest that no such access is necessary given the availability of existing county and township roads currently accessible via TH 56 within/adjacent to the project area.

MnDOT's District 6 Water Resources Engineer would like to see *and verify* storm water runoff calculations, including a summary table, showing that the Louise Solar Project will not be increasing peak runoff rate to MnDOT right of way.

MnDOT views solar generating projects as it would any other private commercial venture and does not consider a solar generating project to be a public utility for transportation purposes. Any MnDOT land that Louise Solar may wish to occupy would need to be leased (in the areas where a lease is feasible). In addition, any associated electrical collection systems that run *along* a trunk highway right of way would need to be permitted through a municipal, cooperative or investor owned electric service provider. MnDOT allows private parties to place connecting lines across trunk highway rights of way but does not allow private parties to place such facilities longitudinally along trunk highways.

Because MnDOT's highway construction activities could impact project construction and plans to haul oversized loads to the proposed site, Louise Solar will need to coordinate with MnDOT when planning such loads. MnDOT District 6 planned construction projects can be found here:

[Projects - Southeast Minnesota District 6 \(state.mn.us\)](https://state.mn.us/projects-southeast-minnesota-district-6)

Should the PUC issue a Site Permit for the Louise Solar Project, LLC, early coordination with MnDOT staff is strongly encouraged. Any MnDOT permits applied for as a part of these projects will not be issued until the PUC has issued an approved site permit for this project. All applicable permitting, traffic control and construction coordination efforts should be made through Jonathan Keranen, MnDOT District 6B Engineering Specialist at 507-456-5347 or Jonathan.Keranen@state.mn.us. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT owned property.

MnDOT has a continuing interest in working with the PUC, DOC EERA and Louise Solar Project, LLC to ensure that possible impacts to the state transportation system are adequately addressed. MnDOT appreciates the opportunity to participate in the development of the scope of the environmental report.

Sincerely,

Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management
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cc: Jonathan Keranen – District 6B Permits

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