

Our team members, which includes project developers, environmental lead, and consultants from Cardno, would like to join to ensure that we are aligned on this effort and any others moving forward under your team's guidance.

How would I need to proceed in setting up that call?

Thanks,

James Hartsig | Manager, Vegetation Management
Invenergy | 1401 17th Street, Suite 1100, Denver, CO 80202
jhartsig@invenergy.com | O 303.800.9341 | C 970.380.7448 | @InvenergyLLC



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From: Levi, Andrew (COMM) <andrew.levi@state.mn.us>
Sent: Monday, June 6, 2022 9:30 AM
To: Hartsig, James <JHartsig@invenergy.com>; MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>
Subject: [EXTERNAL] RE: Lake Wilson Vegetation Management Plan Review

Good morning,

You will need to coordinate with Jamie MacAlister (copied). She is EERA's VMP lead.

Thank you.

—Andrew

From: Hartsig, James <JHartsig@invenergy.com>
Sent: Monday, June 6, 2022 10:19 AM
To: Levi, Andrew (COMM) <andrew.levi@state.mn.us>
Subject: RE: Lake Wilson Vegetation Management Plan Review

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Good morning Andrew,

We have reviewed your team's comments and summary and have made some necessary changes to our Vegetation and Soil Management Plan (VSMP) for the Lake Wilson Solar Project. I'd like to share that updated document and schedule a call to discuss your team's review of the document. We want to assure that we are aligned on some of these components. Invenergy is looking to expand some the corridors from the original layout that your team reviewed. However, I think that touching base on your high-level comments will help us with identifying core concepts and finalizing this document.

Do I need to schedule that call with you? Or do I need to go through the EERA website? I'll make sure that you have our updated VSMP before scheduling that call.

Thanks,

James Hartsig | Manager, Vegetation Management
Invenergy | 1401 17th Street, Suite 1100, Denver, CO 80202
jhartsig@invenergy.com | O 303.800.9341 | C 970.380.7448 | @InvenergyLLC



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From: Levi, Andrew (COMM) <andrew.levi@state.mn.us>
Sent: Thursday, February 10, 2022 12:29 PM
To: Hartsig, James <JHartsig@invenergy.com>
Cc: Giampoli, Andrea <AGiampoli@invenergy.com>; Crawl, Mark <MCrawl@invenergy.com>; Joe Sedarski <Joe.Sedarski@westwoodps.com>; Jeremy Duehr <JDuehr@fredlaw.com>; MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>
Subject: [EXTERNAL] Lake Wilson Vegetation Management Plan Review

Good day,

The following is consolidated state agency comment. Please give me a call so we can discuss next steps.

The Lake Wilson Draft Vegetation Management Plan (VMP) has been reviewed by the interagency Vegetation Management Planning Workgroup. Detailed comments are included in the attached plan, with additional comments below. We look forward to discussing our comments with you and helping you develop a vegetation management plan that is consistent with current guidance and best practices.

High-Level Comments

The plan is moving in the right direction. Clearly defining objectives (and how they will be measured) will address a number of the concerns below.

- The plan does not include a definition of high-quality prairie, a term used throughout. Please define this term and how it will be measured.
- The objectives are sometimes conflicting and not measurable, which leaves other sections lacking in detail (supplemental seeding, mowing, etc).
- Seed mixes are confusing and do not always correspond to soil type (see DNR and BWSR suggestions below).
- It's not clear how adjacent natural features are being treated (avoided? Impacted? Mitigation if appropriate?). Please clarify.
- There is concern that if lands adjacent to buffer areas are cropped, pesticide drift is a concern for establishment and long-term management.
- Monitoring section is weak largely because there are no measurable objectives.
- Pre-seeding the area with native seeds before construction is unusual. How will the pre-seeded areas be avoided during construction and monitored for potential disturbance? How will the transition from temporary seed mixes to permanent seed mixes be accomplished and how does this relate to the SWPPP?
- Ideally, any temporary cover that is used would be treated with herbicide just before or shortly after a permanent native seed mix is installed to eliminate competition. This is particularly important if winter wheat is

used as a temporary cover as it can be aggressive inhibit native species through chemical means as well. This has been a tricky sequence related to compliance with permits. Seed should probably be installed with a native seed drill to the extent possible to help with the establishment of the grasses (forbs and sedges broadcast on the surface). This sequencing and relation to permits would be a good topic for us to continue discussing.

- Poorly drained areas have been matched with mesic seed mixes when instead, a wet-mesic seed mix is most appropriate for these areas. The species included in the “mesic” grass mix does indeed contain wet species. So, to avoid confusion, suggest relabeling some of the mesic mixes to wet-mesic.
- Maps should be included/embedded within the document.

Seed Mixes

Upland array grass mix: *Carex pensylvanica* is not appropriate for this mix; difficulty establishing from seed, supply issues

- The only 2 forbs are red and white clover—two non-native species (while inconsistent with our preferences for native vegetation, this is likely OK given that applicant is not trying to meet the habitat friendly solar standard)

Mesic array grass mix

- The species included are appropriate for the poorly drained soils on site
- Relabel this mix wet-mesic mix so it’s not confusing. The majority of species in the mix are appropriate for wetter sites
- Concerns about the soil moisture on site given that this “mesic” mix is really a wetland mix given the species contained therein.

Upland high-quality mix:

- Is this mix intended to be more dry soil moisture types? It just says upland so assuming that means dry
- Limited number of cool-season species included
- Consider adding *Carex bicknellii* and *Carex brevior*
- Increase rate of prairie dropseed

Upland mesic high-quality mix:

- This mix is not appropriate for the soils on site and seeding area where it’s prescribed; many of the species are more appropriate for the upland high quality seed mix areas
- Area where this is slated to go includes poorly drained soils, mix does not contain enough wet-moisture species
- Most of the species in this mix are drier
- Remove *Elymus trachycaulus*, this can only be found as a cultivar
- Add 5 forb species

Thank you.

—Andrew

Andrew Levi

Environmental Review Manager

Energy Environmental Review and Analysis

Department of Commerce

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From: Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>
Sent: Wednesday, July 20, 2022 11:39 AM
To: Olagbegi, Korede; Hartsig, James; Phillips, Michelle; Mark Prankus; Schultz, Rob
Cc: MacAlister, Jamie (COMM); Roos, Stephan (MDA); Shaw, Dan B (BWSR); Smith, Todd (MPCA); Benage, Megan (DNR); Boettcher, Joanne (DNR)
Subject: [EXTERNAL] RE: VMP working group - Early DNR Coordination Follow Up
Attachments: Lake Wilson Solar Project, Murray Co, MN - DNR Early Coordination Comments; 2016 05 DNR-CommercialSolarSitingGuidanceMay2016_2.pdf

Good morning all,

During yesterday's VMP meeting, there was some discussion about locations outside of the array areas. Early coordination with DNR staff did identify sensitive resources in the project area. Due to the changeover in staff, I am sending the early coordination email that was provided by Joanne Boettcher, the Regional Environmental Assessment Ecologist in the Region 4. Joanne will be your primary DNR contact until your site permit application has been submitted.

The DNR's Commercial Solar Guidance (attached) is currently being updated and there will be some substantial revisions to the document. We can provide the updated version when it becomes available. Note that there will be changes to the section on security fencing. Recent PUC site permits have required the permittee to coordinate with the DNR on appropriate fencing.

Additions to the DNR's Commercial Solar Guidance include the following recommendations:

Facility Lighting

Animals depend on the daily cycle of light and dark for behaviors such as hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. In addition to the undesirable effects of upward facing lighting, the hue of lights can also affect wildlife. LED lighting has become increasingly popular due to its efficiency and long lifespan. However, these bright lights tend to emit blue light, which can be harmful to birds, insects, and fish. The DNR recommends using shielded and downward facing lighting to minimize impacts associated with security lights, substations, and operations and/or maintenance buildings. The DNR also recommends using LED lights with warm hues because they are less likely to affect wildlife and attract insects.

Snowmobile Trail Reroutes or Closures

Snowmobiling is a popular recreational activity during Minnesota's winter months. The Minnesota Legislature has delegated the responsibility of administering a cost-sharing program for the development and maintenance of snowmobile trails to the DNR. The state's grants-in-aid (GIA) program provides funding for trail maintenance and grooming to a snowmobile trail system that has grown to over 21,000 miles.

Impacts to snowmobile trails can be best avoided by limiting or refraining from construction activities from December 1 through April 1. If a snowmobile trail route within or near the project boundary will be temporarily or permanently rerouted, the project proposer should coordinate with the appropriate trail contact (e.g., the local snowmobile club) and DNR Parks and Trails. Coordination should occur early on to allow time to accommodate any changes to the snowmobile trail route. Snowmobile clubs finalize trail routes by mid-summer and the trails are not normally changed prior to the winter recreation season. Trail users

incorporate the route maps as mobile phone applications on their phones and any late-determined route changes can cause safety issues.

Water Appropriation

A water appropriation permit may be needed for construction dewatering or dust control. The Water Appropriation Permit Program exists to balance competing management objectives that include both development and protection of Minnesota's water resources. A water use permit from the DNR is required for all users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year.

Dust Control

Products containing calcium chloride or magnesium chloride are often used for dust control. Chloride products that are released into the environment do not break down and can accumulate to levels that are toxic to plants and wildlife. The DNR recommends the avoidance of chemical dust suppressants containing chloride.

Best regards,

Cynthia

Cynthia Warzecha

Energy Projects Planner

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155

Phone: 651-259-5078

Email: cynthia.warzecha@state.mn.us



From: Olagbegi, Korede <KOlagbegi@invenergy.com>

Sent: Tuesday, July 19, 2022 1:16 PM

To: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>; Hartsig, James <JHartsig@invenergy.com>; Phillips, Michelle <MPhillips@invenergy.com>; Mark Prankus <Mark.Prankus@cardno.com>; Benage, Megan (DNR) <megan.benage@state.mn.us>; Schultz, Rob <RSchultz@invenergy.com>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>; Roos, Stephan (MDA) <stephan.roos@state.mn.us>; Shaw, Dan B (BWSR) <dan.shaw@state.mn.us>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Ek, Scott (PUC) <scott.ek@state.mn.us>; Smith, Todd (MPCA) <todd.smith@state.mn.us>

Cc: Erdmann, Paul (BWSR) <paul.erdmann@state.mn.us>; Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>; Groenheider, Kim (COMM) <kim.Groenheider@state.mn.us>

Subject: RE: VMP working group

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From: Olagbegi, Korede
Sent: Tuesday, February 7, 2023 5:15 PM
To: 'MacAlister, Jamie (COMM)'; 'Ness, Jenna (COMM)'
Cc: Monterrosa, Monica; Hartsig, James; 'Benage, Megan (DNR)'; 'Ek, Scott (PUC)'; 'Miltich, Louise (COMM)'; 'Roos, Stephan (MDA)'; 'Shaw, Dan B (BWSR)'; 'Smith, Todd (MPCA)'; 'Warzecha, Cynthia (DNR)'; 'Erdmann, Paul (BWSR)'; 'Jeremy Duehr'; 'Agrimonti, Lisa'; Giampoli, Andrea; Schultz, Rob
Subject: RE: Lake Wilson Solar Vegetation and Soil Management Plan (for Working Group)
Attachments: Lake Wilson VSMP _ Site Permit Submittal.pdf

Good Afternoon,

Thank you again for your comments on the VSMP for Lake Wilson. We took your comments into account and revised the document where we could based upon the information we have at this moment. Attached is the revised document, which will also be available for review with our official site permit application filing that we plan to submit this week. We believe we can address any additional comments or questions during the permitting process.

Thank you,

Korede Olagbegi | Associate, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
kolagbegi@invenergy.com | W: 708-377-9803 | C: 757-597-6211

From: Olagbegi, Korede <KOlagbegi@invenergy.com>
Sent: Thursday, December 29, 2022 2:20 PM
To: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>; Ness, Jenna (COMM) <jenna.ness@state.mn.us>
Cc: Monterrosa, Monica <MMonterrosa@invenergy.com>; Hartsig, James <JHartsig@invenergy.com>; Benage, Megan (DNR) <megan.benage@state.mn.us>; Ek, Scott (PUC) <scott.ek@state.mn.us>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>; Roos, Stephan (MDA) <stephan.roos@state.mn.us>; Shaw, Dan B (BWSR) <dan.shaw@state.mn.us>; Smith, Todd (MPCA) <todd.smith@state.mn.us>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Erdmann, Paul (BWSR) <paul.erdmann@state.mn.us>; Jeremy Duehr <JDuehr@fredlaw.com>; Agrimonti, Lisa <LAgrimonti@fredlaw.com>; Giampoli, Andrea <AGiampoli@invenergy.com>; Schultz, Rob <RSchultz@invenergy.com>
Subject: RE: Lake Wilson Solar Vegetation and Soil Management Plan (for Working Group)

Thank you all,

We will review the comments provided and will be in touch if there are any questions.

Happy Holidays and Best Regards,

Korede

Korede Olagbegi | Associate, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
kolagbegi@invenergy.com | W: 708-377-9803 | C: 757-597-6211

From: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>

Sent: Thursday, December 22, 2022 4:19 PM

To: Olagbegi, Korede <KOlagbegi@invenenergy.com>; Ness, Jenna (COMM) <jenna.ness@state.mn.us>

Cc: Monterrosa, Monica <MMonterrosa@invenenergy.com>; Hartsig, James <JHartsig@invenenergy.com>; Benage, Megan (DNR) <megan.benage@state.mn.us>; Ek, Scott (PUC) <scott.ek@state.mn.us>; MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>; Roos, Stephan (MDA) <stephan.roos@state.mn.us>; Shaw, Dan B (BWSR) <dan.shaw@state.mn.us>; Smith, Todd (MPCA) <todd.smith@state.mn.us>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Erdmann, Paul (BWSR) <paul.erdmann@state.mn.us>

Subject: [EXTERNAL] RE: Lake Wilson Solar Vegetation and Soil Management Plan (for Working Group)

Korede and team:

The VMPWG has reviewed the revised Lake Wilson VSMP. The attached pdf has specific comments, with BWSR comments below. Overall, this is a very well-crafted plan! Specifically, the embedded graphics along with their inclusion in an appendix is extremely helpful for understanding the site and proposed actions. Secondly, the goals, objectives, and monitoring sections are thorough and understandable. We appreciate the work you've put into the revised plan and our relatively minor comments reflect that.

One thing that is not clear to me is if LWS is committing to Habitat Friendly Solar (HFS) or not. Based on the scorecard in the back, I would say yes, but I didn't see a specific commitment to that in the plan. If LWS is committing to HFS, I recommend putting that commitment up front in the document. Based on BWSR's comments below, the project qualifies and we would like to see a commitment to HFS. If I missed that, my apologies.

BWSR Comments:

From a Habitat Friendly Solar perspective, it looks like the site would meet the standard as currently proposed, however- (as identified by Megan in Feb. 2022)-

- Most of the site will have only native grasses, the only forbs they plan to seed are two non-native species, red and white clover. This is like setting the table, but not putting any food out. With such a large site and its location, there's great opportunity to provide good pollinator habitat. We would like to see additional native forbs in the main mixes (including spring, summer, and fall blooming species). Adding milkweed would benefit monarch butterflies (and other species).
- They do have native forbs in the Stormwater and Detention Pond Seed mix- but I am unable to find the pond(s) size or location- and the forbs are a small percentage of this mix.
- In the HFS Scorecard, they have scored 5 points for 2) Percent of Proposed Vegetation Cover to Be Dominated by Wildflowers- I am assuming that this score is including the non-native clovers (which is allowed) and the stormwater forbs- that these species combined will cover 10-20% of the site?
- In order to receive points for pollinator friendly signage, we would like to see more details including locations and total number of signs.
- In order to receive points for Insecticide Risk/Communications with local applicators, we would like to see examples of emails, letters or communications that will be provided to adjacent landowners. A communication template and fact sheet on pesticide drift can be found on the [HFS webpage](#) under resources.

Please let me know if you have any questions regarding our comments.

Peace, peace, peace and safe travels (if that is in your future).

JM

Jamie MacAlister (she/her)

Environmental Review Manager

651-539-1775

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Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Olagbegi, Korede <KOlagbegi@invenergy.com>

Sent: Tuesday, December 6, 2022 12:06 PM

To: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>; Levi, Andrew (COMM) <andrew.levi@state.mn.us>

Cc: Monterrosa, Monica <MMonterrosa@invenergy.com>; Hartsig, James <JHartsig@invenergy.com>

Subject: Lake Wilson Solar Vegetation and Soil Management Plan (for Working Group)

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Good afternoon,

I hope all has been well on your end. Lake Wilson Solar Energy LLC, a wholly owned subsidiary of Invenergy Solar Development North America LLC (Invenergy LLC), appreciates the opportunity to collaborate with the Vegetation Management Plan Working Group (VMPWG) for the review of our Vegetation and Soil Management Plan (VSMP) for the Lake Wilson Solar Project (Project) in Murray County. We submitted the draft site permit application for the Project to DOC EERA on 11/23/2022. We wanted to provide to the VMPWG for review, a courtesy copy of the revised VSMP we submitted with the draft site permit application. In the enclosed VSMP we have addressed both the high-level comments and the commentary we received in February 2022 from the VMPWG. The final VSMP will be included with the Project's site permit application as an appendix. We have provided the following responses bulleted below in blue to the VMPWG's high-level comments following its earlier review of our Draft VSMP.

High-Level Comments

1. The plan does not include a definition of high-quality prairie, a term used throughout. Please define this term and how it will be measured.
 - Reference to "high-quality prairie" has been removed. Prescribed management activities only include areas within the array fence lines and the perimeter buffer directly adjacent to and outside of the fence lines. All areas proposed for revegetation (excluding areas with existing undisturbed vegetation not under or between arrays and stormwater facilities) will be seeded with the appropriate hydrologic grass-dominated mix as specified in the VSMP.

2. The objectives are sometimes conflicting and not measurable, which leaves other sections lacking in detail (supplemental seeding, mowing, etc.).
 - Objectives have been updated to include specificity and management action triggers. Updated draft objectives were provided to the VMPWG and reviewed with the Project team during the VMPWG's 7/19/22 monthly meeting.
3. Seed mixes are confusing and do not always correspond to soil type (see DNR and BWSR suggestions below).
 - Seed mixes have been revised into dry-mesic and wet-mesic based on soil unit classifications.
4. It's not clear how adjacent natural features are being treated (avoided? Impacted? Mitigation if appropriate?). Please clarify.
 - Revised the VSMP to make clear that all adjacent natural features are being avoided and set objectives for doing so in the VSMP.
5. There is concern that if lands adjacent to buffer areas are cropped, pesticide drift is a concern for establishment and long-term management.
 - The VSMP outlines steps to avoid drift, which include annual landowner education and periodic inspections by facility operators. Chronic pesticide drift will be addressed on a case-by-case basis with landowners.
6. Monitoring section is weak largely because there are no measurable objectives.
 - Included indication that objectives have metrics that are tied into the monitoring program. The proposed monitoring protocol has been outlined and is based on methodology referenced in the Habitat Friendly Solar Program materials.
7. Pre-seeding the area with native seeds before construction is unusual. How will the pre-seeded areas be avoided during construction and monitored for potential disturbance? How will the transition from temporary seed mixes to permanent seed mixes be accomplished and how does this relate to the SWPPP?
 - Pre-construction permanent seeding will only occur in areas that will not be graded prior to array installation. During construction, on-site monitoring personnel will map areas of disturbance that will require re-seeding and weed treatment, if necessary.
 - A temporary cover crop will be included with the permanent seed mix. In areas where temporary cover crop is used by itself, temporary cover will remain in place prior to permanent seeding. If necessary, the cover crop will be chemically terminated before the installation of the permanent seed mix.
 - The sequencing of temporary cover crop to perennial cover aligns with the SWPPP because the outcome will be to either temporarily or permanently establish a vegetative cover for surface stabilization.
8. Ideally, any temporary cover that is used would be treated with herbicide just before or shortly after a permanent native seed mix is installed to eliminate competition. This is particularly important if winter wheat is used as a temporary cover as it can be aggressive inhibit native species through chemical means as well. This has been a tricky sequence related to compliance with permits. Seed should probably be installed with a native seed drill to the extent possible to help with the establishment of the grasses (forbs and sedges broadcast on the surface). This sequencing and relation to permits would be a good topic for us to continue discussing.
 - See previous comment. We are open to continuing to discuss this topic and will use our adaptive management program to adjust and update techniques as new lessons are learned through application.
9. Poorly drained areas have been matched with mesic seed mixes when instead, a wet-mesic seed mix is most appropriate for these areas. The species included in the "mesic" grass mix does indeed contain wet species. So, to avoid confusion, suggest relabeling some of the mesic mixes to wet-mesic.
 - Seed mixes have been revised and assigned based on soil characteristics.
10. Maps should be included/embedded within the document.
 - Maps have been embedded in the VSMP.

We look forward to continuing our engagement with the Energy Environmental Review and Analysis team throughout the implementation of the VSMP. For any questions regarding the content of the VSMP, please contact James Hartsig by email at jhartsig@invenergy.com or by phone at 720-617-7323, Korede Olagbegi by email at kolagbegi@invenergy.com or by phone at 708-377-9803, or Monica Monterrosa by email at MMonterrosa@invenergy.com or by phone at 312-582-1552.

Thank you,

Korede Olagbegi | Associate, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
kolagbegi@invenergy.com | W: 708-377-9803 | C: 757-597-6211

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Minnesota Department of Transportation (MDOT)

From: Monterrosa, Monica
Sent: Monday, November 14, 2022 1:04 PM
To: Kotch Egstad, Stacy (DOT)
Cc: Olagbegi, Korede
Subject: RE: RE: REQUEST FOR COMMENTS ON LAKE WILSON SOLAR ENERGY PROJECT IN MURRAY COUNTY

Thank you very much for sharing the links.

Best Regards,

Mónica Monterrosa, PMP | Director, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
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From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Monday, November 14, 2022 12:28 PM
To: Monterrosa, Monica <MMONTERROSA@INVENERGY.COM>
Cc: Olagbegi, Korede <KOlagbegi@invenergy.com>
Subject: [EXTERNAL] RE: RE: REQUEST FOR COMMENTS ON LAKE WILSON SOLAR ENERGY PROJECT IN MURRAY COUNTY

Thank you for your answers, much appreciated.

It seems that there will be little affect on the TH 30 corridor within the project area.

For all temporary access and other possible MnDOT permitting considerations, I've attached some helpful links below:

[D8 Planning](#) – Upcoming District Construction plans and staff contacts

[Utility Accommodation on Highway Right of Way - Policies - MnDOT \(state.mn.us\)](#)

[Permit Information and Forms - Utility Agreements & Permits - MnDOT \(state.mn.us\)](#)

[Right of Way Mapping and Monitoring - MnDOT \(state.mn.us\)](#)

Please feel free to contact me with any additional questions you may have,

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
O: 651-366-4635
mndot.gov/



From: Monterrosa, Monica <MMONTERROSA@INVENERGY.COM>

Sent: Monday, November 14, 2022 11:45 AM

To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>

Cc: Olagbegi, Korede <KOlagbegi@invenergy.com>

Subject: RE: RE: REQUEST FOR COMMENTS ON LAKE WILSON SOLAR ENERGY PROJECT IN MURRAY COUNTY

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Dear Ms. Kotch

Thank you for your response and comments to our Lake Wilson Project. As you correctly point out it is an early stage to have all the details of the project, for the same reason it has taken us some time to review your comments and provide an answer. Please see our comments in blue.

1. ***IF*** the project lies south of TH 30 in its entirety, why is the boundary overlapping to the north of TH 30?
The project will be entirely south of MN TH 30. The latest project area was included in the July 29, 2022 Request for Comment letter. This boundary was shown as a heavy red line and may give the appearance that the Project Area includes TH 30, but the Project in fact lies immediately south of the highway and will implement appropriate setbacks that meet or exceed the requirements listed in the Murray County ordinances.
2. Are there any early ideas of where the collection lines, access roads, O&M building and 115kV HVTL might be placed in relation the TH ROW?
Yes, currently the entire layout is located south of the ROW of TH 30, and within signed participating land. No features, including perimeter fences are proposed within the ROW and no access roads are proposed from TH 30. The O&M and short 115kV HVTL are all proposed approximately 1.75 miles south of TH 30 along 70th Ave.
3. Will NSP/Xcel be the owner of the 115kV line within the facility? The letter says they will own the switchyard but does not specify ownership of 115kV.
The 115kV line will be constructed as a portion of the project and ultimately owned by Xcel. It will be a very short line, not anticipated to exceed 500 feet and will be entirely contained on private land, outside of any ROW, approximately 1.75 miles south of TH 30 along 70th Ave.

We hope these comments answer your questions. Please let us know if you have any other questions.

Best,

Mónica Monterrosa, PMP | Director, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
mmonterrosa@invenergy.com | W (312) 582-1552 | C (312) 508-8743 | @InvenergyLLC

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Wednesday, August 24, 2022 9:32 AM
To: Monterrosa, Monica <MMONTERROSA@INVENERGY.COM>
Subject: [EXTERNAL] RE: REQUEST FOR COMMENTS ON LAKE WILSON SOLAR ENERGY PROJECT IN MURRAY COUNTY

Ms. Monterrosa,

Thank you for your request for comments on the above-mentioned project proposal.

At this early stage, the project lacks many of the details required for MnDOT to provide sufficient comments. However, we have several questions that you may or may not be able to answer at this time:

1. ***IF*** the project lies south of TH 30 in its entirety, why is the boundary overlapping to the north of TH 30?
2. Are there any early ideas of where the collection lines, access roads, O&M building and 115kV HVTL might be placed in relation the TH ROW?
3. Will NSP/Xcel be the owner of the 115kV line within the facility? The letter says they will own the switchyard but does not specify ownership of 115kV.

Thank you for any additional information you can provide. MnDOT will deliver more specific comments once information is shared about facilities affecting TH ROW – whether that is now or when your application is filed with MN PUC.

Regards,

Stacy Kotch Egstad

Utility Routing & Siting Coordinator | Office of Land Management

Minnesota Department of Transportation

395 John Ireland Blvd Mailstop 678

St. Paul, MN. 55155

O: 651-366-4635

mndot.gov/



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Federal Aviation Administration (FAA)

From: Johnson, Mark R (FAA) <Mark.R.Johnson@faa.gov>
Sent: Tuesday, August 30, 2022 10:32 AM
To: Monterrosa, Monica; matthew.vollbrecht@westwoodps.com
Cc: Butler, Lindsay (FAA)
Subject: [EXTERNAL] Proposed Lake Wilson Solar Energy Project

Follow Up Flag: Follow up
Flag Status: Flagged

Monica,

Thank you for sharing with us your Lake Wilson Solar Energy Project information. Your submittal showed the proposed project location to be near the cities of Lake Wilson and Hadley, MN, in the vicinity of (IVO) 43° 58' 45" N / 95° 54' 13" W. This location is roughly 4 - 5 miles due west of the Slayton Municipal Airport (airport identifier KDVP), centered at 43° 59' 12.481" N / 95° 46' 57.397" W. As your project proceeds, the Federal Aviation Administration (FAA) would request that an airspace analysis be submitted to us, to determine the overall effects of your project on the national airspace both permanently, and temporarily (e.g. Would a crane be used to install the solar panels?). This airspace analysis would be submitted through an FAA form 7460, which can be completed electronically through the FAA's Obstruction Evaluation/Airports Airspace Analysis (OE/AAA) website. Please allow 45 days for your submittal to be reviewed prior to construction.

<https://oeaaa.faa.gov/oeaaa/oe3a/main/#/home>

This site provides a pre-screening tool and instructions on how to file a structure with the FAA (hyperlinks to the right of the page under "Getting Started, Top Tasks"). Please work through this site and contact me if you have questions.

v/r,

Mark R. Johnson, P.E.
Program Manager

Federal Aviation Administration
Dakota-Minnesota Airports District Office
6020 28th Avenue South, Suite 102
Minneapolis, MN 55450
Tel: 612-253-4642
Fax: 612-253-4611
Email: mark.r.johnson@faa.gov

Murray County, MN

From: Litchfield, Daniel
Sent: Wednesday, December 18, 2019 10:18 AM
To: 'Lori Gunnink'
Subject: RE: Lake Wilson solar update

Thanks, will do.

Dan Litchfield | Director, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
dlitchfield@invenergyllc.com | 773-318-1289 | @InvenergyLLC

From: Lori Gunnink <LGunnink@co.murray.mn.us>
Sent: Tuesday, December 17, 2019 10:54 PM
To: Litchfield, Daniel <DLitchfield@invenergyllc.com>
Subject: [EXTERNAL] Re: Lake Wilson solar update

Thank you for the update. Please let me know if there is anything I can do.
Lori

Sent from my iPhone

On Dec 17, 2019, at 5:21 PM, Litchfield, Daniel <DLitchfield@invenergyllc.com> wrote:

CAUTION – OUTSIDE EMAIL: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lori,

Hello! It has been awhile and I hope you are well. We really appreciate the opportunity Murray County gave us to comment on the proposed new zoning ordinance and the consideration the County gave to the comments we provided. We are looking forward to further coordination with the County to enable the local benefits that our project can bring.

Two updates for you:

Personnel – Michael Svedeman heard the call of the mountains and moved to our Denver office last year and is now transitioning to our western development team and will be working on renewable projects in a different region. I'm still in a leadership role in our central region and you haven't seen the last of me in Murray County, but Michael will be transitioning out of this project and we will continue our development work under the direct leadership of Mark Crawl and Harry Finch. Harry will likely contact you to schedule a visit in mid-January.

Project overview – I may seem like a broken record as I know I have lamented this before, but the regional transmission operator has a big backlog of future generation projects and there has been a corresponding delay in the schedule for the necessary engineering studies we need to go through before we can know what transmission upgrades are necessary to allow for the interconnection of our project. We filed our request to connect to the transmission line in Murray County in August 2017 and we got our first, preliminary feedback only in October this year! Though far from conclusive, the results were encouraging so we have stayed in the study process. We were expecting more definitive results in January, but last week another delay was announced and now we have to wait until April. Our project is one in a group of 27 projects representing over 4,000 megawatts (MW) of future projects across the MISO West region, which includes Minnesota, Iowa and the Dakotas. Within that group, we have the largest solar position in the state of Minnesota at 150 MW, compared to a 32.5 MW project in Lyon County and a 40 MW project in Pipestone County. So we like our leadership position and are hoping for a clean bill of health from the interconnection studies this spring. That said, until we get those results, we don't want to get you folks and others spun up with the permitting process for our project.

So I'm trying to say that our Lake Wilson site is very important to us and please don't misinterpret lack of activity on our part as disinterest. We just need to wait on the process to play out. We have conducted engineering and environmental research on the site so we are prepared to move forward when we find out more about our interconnection. Harry's visit in January is to do some "social investigation" to see what questions our landowners, their neighbors and the community have. So stay tuned for contact from Harry to try to schedule a meeting in January.

Have a fun and healthy holiday season with your families and happy new year in advance!

Regards,

Dan Litchfield | Director, Renewable Development
Invenenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
dlitchfield@invenenergyllc.com | 773-318-1289 | @InvenenergyLLC

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From: Litchfield, Daniel
Sent: Monday, June 7, 2021 4:54 PM
To: Jean Christoffels; Lori Gunnink
Cc: Crowl, Mark; Jeremy Duehr
Subject: RE: Lake Wilson Solar still chugging along

Thanks Jean, good to hear from you!

I'll schedule this and join if I can.

Dan Litchfield | Director, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
dlitchfield@invenergy.com | 773-318-1289 | @Invenergy

From: Jean Christoffels <JChristoffels@co.murray.mn.us>
Sent: Monday, June 7, 2021 1:26 PM
To: Lori Gunnink <LGunnink@co.murray.mn.us>; Litchfield, Daniel <DLitchfield@invenergy.com>
Cc: Crowl, Mark <MCrowl@invenergy.com>; Jeremy Duehr <JDuehr@fredlaw.com>
Subject: [EXTERNAL] RE: Lake Wilson Solar still chugging along

Good Afternoon –
Either the 17th or 18th work for me, and any time those days.

Thank you.

Jean M. Christoffels

Jean M. Christoffels
Murray County Zoning/Environmental Administrator
2500 28th Street – PO Box 57
Slayton, MN 56172
507-836-1166
jchristoffels@co.murray.mn.us
www.murraycountymn.com

From: Lori Gunnink <LGunnink@co.murray.mn.us>
Sent: Monday, June 7, 2021 7:18 AM
To: Litchfield, Daniel <DLitchfield@invenergy.com>
Cc: Jean Christoffels <JChristoffels@co.murray.mn.us>; Crowl, Mark <MCrowl@invenergy.com>; Jeremy Duehr <JDuehr@fredlaw.com>
Subject: Re: Lake Wilson Solar still chugging along

Good Morning
Either day will work for me, 17th 10 am or later and the 18th afternoon is best.
Thank you and look forward to moving project forward.

Lori

Sent from my iPhone

On Jun 4, 2021, at 9:42 AM, Litchfield, Daniel <DLitchfield@invenergy.com> wrote:

Warning! This email originated from outside Murray County and the sender is not verified. Use caution with links and attachments.

Good morning Jean and Lori,

Wow it has been awhile and I hope you are both healthy and getting through this wild pandemic time!

I am writing with an update on our solar project and am acutely aware that we've been talking about this for a long time. While we have been rapidly advancing some large solar projects in Wisconsin ([example article](#)), we are finally nearing a position to attempt to advance our project in your county. The much delayed regional grid interconnection studies have advanced and the clouds have parted and we think we have a viable path to connect. So we plan to begin permitting work later this year.

To that end, we'd like to schedule an update meeting with you over Microsoft Teams or another video conferencing software of your choice. A tentative agenda would be:

1. Introductions:
 - a. Mark Crowl is a Manager of Renewable Development and will be our day-to-day lead on this project
 - b. Jeremy Duehr is a permitting attorney with Fredrikson & Byron and we will be drawing on his vast experience permitting solar projects in Minnesota to guide us through the process
2. Project overview/refresher
3. Proposed schedule
4. Discussion of a potential discrepancy we've identified in your County Ordinance and maps that we'd like to address
5. Process to initiate a Development and Road Use Agreement
6. Roundtable

As for times, how about 6/17 or 6/18? I will be on PTO, but Mark and Jeremy can represent us well. I understand the week of 6/21 is not good for Lori.

Dan Litchfield | Director, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
dlitchfield@invenergy.com | 773-318-1289 | @Invenergy

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From: Travis Radke <TRadke@co.murray.mn.us>
Sent: Tuesday, September 13, 2022 9:41 AM
To: Olagbegi, Korede
Subject: [EXTERNAL] RE: Drain Tile Buffer - Lake Wilson Solar Project

Good morning,

I don't believe we have any maps that show easements related to ditches/tile. All our ditches follow Minnesota Statute 103E where the drainage authority acquires a perpetual right of way easement on the property over which a drainage system passes. This easement provides access for construction, inspection, and repair on the drainage system.

From: Olagbegi, Korede <KOlagbegi@invenergy.com>
Sent: Monday, September 12, 2022 4:44 PM
To: Travis Radke <TRadke@co.murray.mn.us>
Subject: RE: Drain Tile Buffer - Lake Wilson Solar Project

Good afternoon,

Okay that is good to hear. Thank you for checking on that! Yes, I agree, if county tile were to be included in the fence line, we would not want the county to be unable to access the tile.

One more question for you if that's okay. As far as easements go, from our end we did not or have not seen existing county easements for the drain tile on the properties, besides from maybe one. I am attaching shapefiles of the project boundary just for your knowledge (this is not what would be fenced or anything), but are you aware of any easements that exist for the county tile in this area or the county in general? Is there a county easement map, or any records on file on your end or that could be dug up ?

Thank you,

Korede Olagbegi | Associate, Renewable Development
Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
kolagbegi@invenergy.com | W: 708-377-9803 | C: 757-597-6211

From: Travis Radke <TRadke@co.murray.mn.us>
Sent: Monday, September 12, 2022 3:40 PM
To: Olagbegi, Korede <KOlagbegi@invenergy.com>
Subject: [EXTERNAL] RE: Drain Tile Buffer - Lake Wilson Solar Project

Good afternoon,

I did check with some contractors to make sure the total of 50' would be adequate for repairs. They agreed that this would work. So a total of 50' buffer area for the county tile, 25' each side.
As long as someone will be onsite to facilitate, the fencing shouldn't matter. We just don't want to not be able to access the county tile.

Travis Radke
Travis Radke | Ditch Inspector

3051 20th Street, Slayton, MN 56172

P: 507-836-1137 | C: 507-626-6179

www.murraycountymn.com | e-mail: tradke@co.murray.mn.us



From: Olagbegi, Korede <KOlagbegi@invenergy.com>

Sent: Monday, September 12, 2022 1:46 PM

To: Travis Radke <TRadke@co.murray.mn.us>

Subject: Drain Tile Buffer - Lake Wilson Solar Project

Hi Travis,

It was good to talk in person last week, I hope the rest of your week went well. I left a voice message on your phone this morning, but I just wanted to send an email as well to follow up on the conversation regarding county drain tile and the proposed Lake Wilson Solar Project. As we discussed, since there are no stated set back distances from drain tile in the county ordinance nor in any easements for the private property that would make up the project, we wanted to look to you/the county to determine what would be an adequate distance from the county drain tile to place project facilities. I am looking to confirm that having a 50 ft total buffer/corridor (25 ft on either side) would be adequate for drain tile maintenance considerations as opposed to a 100 ft corridor. Please let me know if that would be okay or give me call when you get the chance. I am also looking to discuss/close the loop on fencing in relation to the tile.

Thank you,

Korede Olagbegi | Associate, Renewable Development

Invenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606

kolagbegi@invenergy.com | W: 708-377-9803 | C: 757-597-6211

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From: Jean Christoffels <JChristoffels@co.murray.mn.us>
Sent: Thursday, January 5, 2023 4:14 PM
To: Olagbegi, Korede
Subject: [EXTERNAL] RE: Lake Wilson Solar - Murray County Water/Sewer/other Extension Plans

Good Afternoon, Korede –

Thank you for sending this request regarding any planned expansion projects within the project boundary of the Lake Wilson Solar project. At this time, I am not aware of any projects being planned. The only area that may arise for individual building sites, would be the possibility of a replacement septic system, if the current one would happen to fail.

Please let me know if you have any questions or if you need anything more.

Have a great rest of your week!

Jean M. Christoffels

Jean M. Christoffels
Murray County Zoning/Environmental Administrator
2500 28th Street – PO Box 57
Slayton, MN 56172
507-836-1166
jchristoffels@co.murray.mn.us
www.murraycountymn.com

From: Olagbegi, Korede <KOlagbegi@invenenergy.com>
Sent: Thursday, January 5, 2023 11:44 AM
To: Jean Christoffels <JChristoffels@co.murray.mn.us>
Subject: Lake Wilson Solar - Murray County Water/Sewer/other Extension Plans

Morning Jean and Happy New Year!

I hope the holidays went well! I have another question that came up that I thought you may be able to help with. We included the following sentences in the draft permit application to the State for Lake Wilson:

“The Project has been designed in compliance with the Murray County Zoning Ordinance and Comprehensive Plan...Components of the Project may be located in areas where there is a planned extension of water, sewer, or other services. Construction of the Project would not preclude the future orderly extension of these services across property under Lake Wilson Solar’s control as these extensions would likely be accomplished by utilizing existing public rights-of-way which will not be impacted by the Project.”

Some feedback we received was that we should explicitly state any planned service extensions or projects that we are aware of, so I just wanted to run this by you to see if there is anything you are aware of at this time within the Project Area and if so if you could provide the nature/location. I included the project area boundary even though we are not planning to use the whole area because it would be good to know of anything in the vicinity.

Thank you,

Korede Olagbegi | Associate, Renewable Development
Invenenergy | One South Wacker Drive, Suite 1800, Chicago, IL 60606
kolagbegi@invenenergy.com | W: 708-377-9803 | C: 757-597-6211

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