



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

May 25, 2023

Jenna Ness  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
St. Paul, MN 55101

**RE: In the Matter of the Applications of Lake Wilson Solar Energy LLC for a Certificate of Need and Site Permit for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, PUC Docket Number: IP-7070/GS-21-792**

Dear Ms. Ness,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application for the Lake Wilson Solar and Associated Battery Storage Project in Murray County. Our agency offers the following comments regarding the potential environmental impacts that should be considered in the environmental assessment (EA).

Unnamed Stream and Beaver Creek

The project borders a significant stretch of an unnamed stream. In one section, panels will be on both sides of the unnamed stream. Our agency recommends that adequate buffer and erosion control be maintained between the stream and land disturbing activities to prevent sediment from entering the system. Downstream of the unnamed stream, Beaver Creek is biologically impaired for fish and macroinvertebrates. Stormwater runoff from the site could contribute to impairments on Beaver Creek.

Security Fencing

Section 3.1.7 of the permit application describes the security fencing that will be installed along the perimeter of each group of solar arrays. The permit application further states that fencing will be designed to prevent the public and larger wildlife from gaining access to solar array electrical equipment, which could cause harm or injury. Our agency recommends that the fence be designed in accordance with the DNR's recently updated *Commercial Solar Siting Guidance*. The DNR appreciates that barbed wire will not be used at the top of the 8-foot agricultural woven wire fence.

### Facility Lighting

The project will include a substation, an operations and maintenance building, and other associated facilities such as a security gate, lighting, and signage. The DNR advises that LED lighting is often high in blue light, which is harmful to birds, insects, and other animals. Potential project impacts related to illuminated facilities can be avoided or minimized by using shielded and downward facing lighting and lighting that minimizes blue hue.

### Dust Control

The permit application acknowledges that dust related to construction traffic is a primary unavoidable project impact. Section 4.5.1 of the permit application states that best management practices will be used during construction to minimize dust emissions. These practices may include watering or treating haul and access roads and other exposed dust producing areas to control fugitive dust. Our agency advises that 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 instead accumulate to levels that are toxic to plants and wildlife. Hence, our agency recommends avoiding the use of dust control products containing chlorides.

### 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. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. These loose fibers could potentially re-suspend and make their way into waterways.

The DNR appreciates the opportunity to comment on the Lake Wilson Solar and Associated Battery Storage 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

EC: Cezar Panait, Minnesota Public Utilities Commission  
Haley Byron, Minnesota Department of Natural Resources  
Korede Olagbegi, Invenergy

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