



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

December 5, 2023

Craig Janezich
Public Advisor – Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**RE: In the Matter of Lake Wilson Solar Energy LLC for a Site Permit for the up to 150 MW Lake Wilson Solar and Associated 95 MWac Battery Storage Project in Murray County
PUC Docket Number: GS-21-792**

Dear Mr. Janezich:

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County. Our agency offers the following comments:

Security Fencing

Page 17 of the EA states that gates will be installed at access road entrances on public roads or near transmission lines. Although security fencing meets DNR standards, the location of deer egress gates, if any, needs clarification. The DNR recommends further coordination with our agency to address this concern.

Facility Lighting

The project will include a substation as well as an operations and maintenance building. 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. Our agency recommends a special permit condition like the one included for the Regal Solar site permit (Docket GS-19-395): *The Permittee must use shielded and downward facing lighting and LED lighting that minimizes blue hue at the project substation and operations and maintenance facility. Downward facing lighting must be clearly visible on the site plan submitted for the project.*

Dust Control

Page 67 of the EA states that chemical stabilization may be used to mitigate dust emissions, but the type is not specified. The DNR 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. To ensure that chloride products are not used for dust control, the DNR recommends a special permit condition like the one included for the Regal Solar site permit (Docket GS-19-395): *The Permittee shall utilize non-chloride products for dust control activities.*

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 special permit condition for the rebuild of the 69 kV transmission line in Stearns County (Docket TL-22-235): *The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.*

The DNR appreciates the opportunity to comment on the Lake Wilson Solar Energy and Associated Battery 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 cynthia.warzecha@state.mn.us or 651-259-5078.

Sincerely,

/s/ Cynthia Warzecha

Energy Projects Planner

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

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