



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

[Electronic Submittal]

September 25, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of Department of Commerce Working Group on Decommissioning of Wind and Solar Facilities, Public Utilities Commission Docket Number: E-999/M-17-123

Dear Mr. Wolf,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to comment on the Working Group Decommissioning Report and the Department of Commerce Energy Environmental Review & Analysis' (DOC EERA) Comments and Recommendations. The DNR offers the following recommendations and comments regarding the information that should be considered in the review and implementation of decommissioning requirements for permitted and future projects:

Plan Review and Updates

The DNR agrees that decommissioning plans should be available earlier in the permitting process. If the plan were included in the site permit application, we would have an opportunity to provide input during the public comment period. Our agency also agrees that plans should be adaptable and we support periodic review and updates to existing plans as best practices, technologies, and regulations evolve. It is likely that the plans would become more detailed as a facility moves closer to decommissioning.

Disturbance Area Maps

The DNR recommends that decommissioning plans include maps identifying areas likely to be disturbed during decommissioning. The maps should be updated if modifications to the disturbance areas are necessary due to engineering constraints or other feasibility issues.

Agency Coordination

Permits and Licenses

The DNR recommends that decommissioning plans require coordination with relevant state agencies. Some decommissioning activities may trigger the need for agency permits or licenses. For example, if crane paths cross public lands or waters in a new location, a DNR license to cross public lands or waters would be required.

Infrastructure Removal

The DNR recommends coordination with our agency regarding the potential environmental impacts resulting from the removal of infrastructure such as solar panels, turbines, access roads, and collector lines. In some situations, it may be important to remove collector lines whereas in other situations leaving them in place could reduce environmental impacts. For example, collector lines should be removed from under public water courses as they may become exposed over time, resulting in navigational hazards or collect debris that could impede flow. Conversely, collector lines could remain in environmentally sensitive areas that are not farmed such as native prairie, wetlands, and sites of biodiversity significance.

Sensitive Resources

The DNR recommends coordination with our agency to ensure protection of rare and unique resources. Staging areas, crane paths, and other aspects of decommissioning could result in environmental impacts to native prairies, calcareous fens, rare species, and other sensitive resources. For example, the location of a crane path during decommissioning may be different from the crane path that was used during original construction and may directly or indirectly affect a calcareous fen. Any effect on fens due to decommissioning activities would require preparation of a calcareous fen management plan and DNR approval. Additionally, the Natural Heritage Information System (NHIS), which provides information on Minnesota's rare plants, animals, native plant communities, and other rare features is continually updated and the status of rare features may change over time.

Thank you for the opportunity to review the Working Group Decommissioning Report and the DOC EERA Comments and Recommendations. If you have questions about the content of this letter, feel free to contact me at cynthia.warzecha@state.mn.us or 651-259-5078.

Sincerely,

/S/ Cynthia Warzecha
Energy Projects Planner

CC: Tricia DeBleeckere, Minnesota Public Utilities Commission
Suzanne Steinhauer, Minnesota Department of Commerce