



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

September 15, 2021

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

RE: In the Matter of the Application of Xcel Energy for a Site Permit and Two Route Permits for the up to 460 Megawatt Sherco Solar Energy Generating System and Associated 345 Kilovolt Transmission Lines in Sherburne County

PUC Docket Number – Site Permit: GS-21-191

PUC Docket Number – Route Permit for East 345 kV Transmission Line: TL-21-190

PUC Docket Number – Route Permit for West 345 kV Transmission Line: TL-21-189

Dear Mr. Storm,

The Minnesota Department of Natural Resources (DNR) has reviewed the application for the Sherco Solar project and its associated transmission lines. Our agency offers the following comments regarding the development of the Environmental Assessment (EA):

Vegetation Management Plan

The DNR appreciates the applicant's extensive early project coordination regarding the Vegetation Management Plan. From our agency's perspective, this project has the potential to provide valuable pollinator habitat. We appreciate the effort made to refine the native seed mixes to suit site conditions and pollinator needs. DNR staff, in conjunction with other members of the Vegetation Management Working Group, look forward to further coordination on the applicant's recently updated plan.

Fencing

Section 5.5.7.2 of the application (page 161) discusses impacts and mitigation associated with wildlife. The DNR appreciates the applicant's intent to coordinate with our agency to ensure that the best strategies for passage/exclusion are used to achieve wildlife safety and to avoid animal-vehicle collisions. Fencing of the solar site has the potential to disrupt wildlife travel corridors, and to funnel wildlife onto nearby highways. The DNR recommends that the EA discuss adequate setbacks from roads to avoid channeling wildlife onto roadways, potentially resulting in wildlife fatalities and safety concerns for the motoring public. The DNR

advises that, at sites where Blanding's turtles are known to occur, gaps at the bottom of the fencing can be incorporated into the design to allow turtles to move in and out of the fenced area.

Potentially Unknown Wells

Section 5.5.2.1 of the permit application (page 138) discusses impacts and mitigation related to geology and groundwater resources. The EA should acknowledge that unknown wells could be discovered during project construction. If previously unknown wells are found, they should be sealed in accordance with Minnesota Department of Health guidelines.

The DNR appreciates the opportunity to provide EA scoping comments on the Sherco Solar project, including its associated transmission lines. 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

CC: William Risse, National Grid Renewables
Scott Ek, Minnesota Public Utilities Commission
Michael Kaluzniak, Minnesota Public Utilities Commission
Melissa Collins, Minnesota Department of Natural Resources
ERDB 20210125