

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

November 3, 2025

Public Advisor  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
St. Paul, MN 55101

**RE: In the Matter of the Application of Castle Rock Solar LLC for a Site Permit for the up to 150 MW Castle Rock Solar Project in Dakota County, Minnesota  
PUC Docket Number: IP-7137/GS-24-267**

Public Advisor,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) and draft site permit (DSP) for Castle Rock Solar (Applicant) to construct an up to 150 MW solar energy generating system (Project). Based on the review of the EA and the DSP, the DNR offers the following comments:

### **Security Fencing**

The EA states the largest impact associated with solar facilities are security fences. The EA states the fence design proposed by the Applicant may increase the risk of large wildlife, like deer, from getting trapped within the solar facility. The EA also indicates the Project's infrastructure may impede deer's ability to exit the Project since wildlife might not be able to reach the speed necessary to jump the security fence. Due to these concerns, the DNR requests the Applicant adheres to our agency's fencing guidance to construct a fence that reaches a height of at least 10 feet. Our agency supports permit condition 4.3.32 of the draft site permit requiring the Permittee to design the final security fence in coordination with the DNR.

### **Karst Features**

The EA indicates the Project is prone to karst development, but karst features have not been identified. Since the Project is prone to karst development, the DNR supports special condition 5.14 of the DSP directing the Permittee to file a geotechnical report prior to construction and limits construction activity within 150 feet of documented karst features. The DNR recommends the special condition also

directs the Permittee to conduct a survey of surface karst features within the Project boundary that are mapped by the DNR's [Minnesota Regions Prone to Surface Karst Feature Development](#). A geotechnical report will not identify surface karst features, so the DNR requests a survey is completed to ensure construction activities do not occur within 150 feet from surface karst features. The DNR also offers a revision to the active karst definition in the DSP for clarity and accuracy. The DNR's proposed revision is underlined as follows: "The Permittee shall survey for surface karst features within areas mapped by the DNR as Regions Prone to Surface Karst Feature Development. The Permittee shall not locate project infrastructure within 150 feet of documented active karst features and avoid all construction activity within 150 feet of documented active karst features. ~~Active karst is~~ Areas prone to surface karst feature development are defined as areas underlain by carbonate bedrock with less than 50 feet of sediment cover."

### **Loggerhead Shrike**

The EA addresses impacts to loggerhead shrikes, a state-listed endangered species, can occur if tree- and shrub-clearing take place during the breeding season. Given the potential for loggerhead shrike to be found near the Project, the DNR supports special condition 5.24 as written in the DSP.

### **Northern long-eared Bat**

The EA indicates that northern long-eared bat, a state-listed species of special concern, may be present within or near the Project. The DNR supports special condition 5.23 of the DSP as written.

### **Sites of Biodiversity Significance**

The EA identifies multiple Minnesota Biological Surveys sites of biodiversity significance near or within the project boundary. The DNR supports special condition 5.22 of the DSP as written.

### **Dewatering**

The EA indicates dewatering may be required during construction due to shallow groundwater in some areas of the Project. As stated in the EA, a DNR Water Appropriation Permit is required for dewatering activities during construction if the water pumped exceeds 10,000 gallons in a day and/or one million gallons in one year. The DNR General Permit for Temporary Appropriation may be used for the dewatering if the dewatering volume is less than 50 million gallons, and the time of the appropriation is less than one year. The DNR appreciates the Applicant's commitment to developing a dewatering plan and supports special condition 5.16 of the DSP directing the Permittee to develop a dewatering plan.

### **Snowmobile Trail**

The EA accurately identifies that the Project would impact Snowmobile Trail 123. Development and maintenance of these trails are financially assisted by Minnesota's grants-in-aid program, which is administered by the DNR. The DNR requests the Applicant coordinate with the snowmobile trail

associations regarding any impacts, such as temporary closure, rerouting, or safety concerns. Coordination with the snowmobile clubs is strongly encouraged to allow time to accommodate any changes to the snowmobile trail route. The [DNR's interactive snowmobile trail map](#) is available online, along with spatial data for download. The DNR supports special condition 5.3 of the DSP as written.

### **Vegetation Management Plan**

The DNR recommends continued coordination with the Vegetation Management Plan Working Group (VMPWG). The DNR supports section 4.3.16 of the DSP encouraging the Applicant to meet the standards of the Minnesota Habitat Friendly Solar Program and requiring native perennial vegetation to create habitat and improve soil quality. Our agency also supports section 4.3.17 of the DSP directing the Applicant to continue coordination with the VMPWG. The final VMP should be developed in accordance with the DNR's [Prairie Establishment & Maintenance Technical Guidance for Solar Projects](#). Our agency appreciates that the Applicant's VMP describes a diverse seed mix of native grasses and forbs for the Project.

### **Lighting**

The EA indicates the Applicant will install motion-activated and down-lit lighting at the Project. The DNR supports special condition 5.19 of the DSP as written.

### **Dust**

The EA states that chloride, a frequently used dust control agent, harms aquatic wildlife by impacting reproduction and physiology and cause fatalities. The DNR supports special condition 5.2 of the DSP as written.

### **Wildlife Friendly Erosion Control**

The EA discusses that plastic erosion control materials can entangle and kill wildlife. The EA also states malachite green dye can enter water bodies and poses serious toxicity concerns for wildlife. Due to these concerns, our agency supports special condition 5.8 as written.

The DNR appreciates the opportunity to comment on the EA and DSP for the Castle Rock Solar Project. Please contact me if you have questions.

Sincerely,

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CC: Melissa Collins, DNR Regional Environmental Assessment Ecologist

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