

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

January 8, 2025

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

RE: In the Matter of the Application of Otter Tail Power Company for a Site Permit for the up to 66 MW Solway Solar Project in Beltrami County, Minnesota

Dear Mr. Hicks,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application for Otter Tail Power Company's Solway Solar Project (Applicant) to construct a 66 MW solar array project (Project). Based on the review of the application, the DNR offers the following comments regarding potential environmental and wildlife impacts that should be considered in scoping for the Environmental Assessment (EA).

Fencing

Section 4.1.5 of the site permit application states that the Applicant intends to install a security fence that reaches a height of eight feet. The DNR recommends the security fence reaches a minimum height of 10 feet around each group of solar arrays to prevent white-tailed deer and other large wildlife from entering the facility. Our agency advises the fence is designed in accordance with the DNR's *Commercial Solar Siting Guidance* and the *Fencing Handbook for 10 ft Woven Wire Deer Exclusion Fence*. We appreciate that the Applicant does not intend to use barbed wire on top of the security fence. The Applicant should coordinate with the DNR to finalize their fencing design to minimize or avoid impacts to wildlife due to fencing.

Lighting

The EA should discuss measures to mitigate lighting impacts associated with substations and inverters. The permit application indicates that the Applicant plans to use down lit lighting at the entrances and

each inverter. In addition to down lit lighting, the DNR also recommends the lighting installed at the project is shielded. The DNR's Commercial Solar Siting Guidance advises limiting the Uplight rating to 0. The nominal color temperature of lighting installed should also not exceed 4,000 kelvin. The DNR recommends choosing lighting products that emit the lowest levels of blue hue, backlight, and glare possible to minimize impacts to birds and insects.

Dust

Section 5.5.1.1.1 of the permit application states that the Applicant will employ dust suppression practices like watering exposed gravel surfaces and using other dust control agents. Dust control agents applied during construction often contain calcium chloride or magnesium chloride. The DNR advises against using products that contain chloride as a dust suppression agent because they do not break down and may accumulate to levels that are toxic to wildlife and plants. The DNR recommends the EA address fugitive dust levels and dust suppression measures that will be taken during construction and once the facility is operational.

Wildlife Friendly Erosion Control

The DNR recommends the EA discuss wildlife friendly erosion control measures at the Project site. Section 4.3.4 of the permit application states that the areas under the solar arrays will contain temporary erosion control measures like silt fences, biologs, and erosion control blankets until permanent vegetation has established. The DNR recommends using biodegradable erosion control materials that are flexible and rectangular due to entanglement concerns of small wildlife. Specifically, erosion control blankets should be limited to "bio-netting" or "natural netting" types and should not contain plastic mesh or other plastic components. If the Applicant intends to use hydro-mulches, the DNR advises using hydro-mulches that do not contain synthetic fibers (plastic) and malachite green dyes which can pose toxicity concerns for fish, wildlife, and insects.

Tree Clearing

The DNR recommends the EA discuss tree clearing at the Project site and the associated ecological and environmental impacts. If feasible, the DNR recommends that the Applicant consider a different project layout by moving the Project Area and Project Boundary to an area that would require less tree clearing. There are clusters of trees in the southeast, northeast, and northwest sections of the Project Boundary. The Natural Heritage Information System letter dated July 15, 2024, indicates that tree removal at the Project Area may adversely effect bat roosting, particularly the federally endangered northern long-eared bat (*Myotis septentrionalis*). Tree removal can be especially detrimental during pup rearing season when females are forming maternity colonies and pups cannot fly. The EA should address tree removal restrictions to protect bat pups. Our agency appreciates the Applicant indicating they will avoid tree removal from March 15 to August 15.

Vegetation Management Plan

The DNR recommends the utilization of a vegetation management plan (VMP), which is included in the Project's permit application. The Project's VMP should be consistent with the DNR's *Prairie Establishment and Maintenance Technical Guidance for Solar Projects*, which provides technical guidance for prairie establishment and management at solar sites. The aim of a VMP should be to develop native seed mixes that suit site conditions and are pollinator-friendly and habitat-friendly. The EA should discuss the Project's construction and vegetation reestablishment phases to minimize stormwater runoff, stabilize soil, and support habitat. The DNR and other members of the Vegetation Management Plan Working Group look forward to future coordination on the Applicant's VMP.

The DNR appreciates the opportunity to provide EA scoping comments on the Solway Solar Project. If you have questions about our agency's comments, I may be reached at martin.donovan@state.mn.us or 651-259-5402.

Sincerely,

Martin Donovan
Energy Review Planner

CC: Owen Baird, Minnesota Department of Natural Resources

Equal Opportunity Employer