



10/29/25

Ms. Lauren Agnew
Energy Infrastructure Permitting
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: October 2025 Environmental Assessment document for Castle Rock Solar, LLC

The Vermillion River Watershed Joint Powers Organization (VRWJPO) appreciates the opportunity to review and comment on the proposed Environment Assessment (EA) document for Castle Rock Solar, LLC in Castle Rock Township, Dakota County dated October 2025. Staff has reviewed the information available on the Minnesota Department of Commerce's website and have the following comments. Please note that all comments are referenced by the page number of the PDF:

EA Document:

1. Page 9, Soils. In defining the impacts to soils resultant of the project, it is suggested that discussion be included relating to how placement of poles/pilings will result in additional soil compaction?
2. Page 9, Surface Water. While this section anticipated minimal to moderate impacts, these impacts are not described. What types of impacts may be realized, specifically to the South Branch and Mainstem Vermillion River reaches?
3. Page 9, Vegetation. It should be noted that there's the possibility perennial vegetation may not establish well if heavily shaded by solar panels or challenges may exist with vegetation management. Depending on the type of vegetation, it should be described how vegetation will be successfully maintained and managed under solar panels.
4. Page 34, Figure 17. It's difficult to tell in this graphic when compared to Figure 44 where conflicts exists between delineated wetlands and stormwater treatment. It appears there are some proposed "Stormwater Vegetated Swales" located within wetlands as identified within the approved Castle Rock Solar Wetland Conservation (WCA) Act Notice of Decisions dated 12/26/2024 and 10/21/2025. The Minnesota WCA seeks to protect and enhance multiple wetland functions including those related to wildlife/fisheries habitat and aesthetic/recreational aspects. Utilizing these areas as stormwater treatment devices may result in the alteration in wetland function and would not be in conformance with the requirements outlined within the WCA.

5. In accordance with MN Rule 103B.235, Castle Rock Township has incorporated the VRWJPO's Watershed Management Plan into its local water management plan and ordinances. As such, some of Castle Rock Township's requirements for Post Construction Stormwater Management, Erosion and Sediment Control, Low Impact Development (LID) Practices, and Wetland and Watercourse Buffer requirements may be more restrictive than those required by the MPCA. This could have the potential to affect the three projects to a greater extent. Staff suggests that the EA document (and Appendix C) be updated accordingly. Listed below are a few comments related to this matter:
 - a. Page 54, Table 10: The text for Stormwater Management and Erosion Control and related footnote shown in Table 15 on page 82 should also be provided in Table 10 under the Local Unit of Government.
 - b. Page 56: Dakota County Soil and Water Conservation District is the delegated WCA LGU for Castle Rock Township. The EA indicates Dakota County oversees local implementation of the WCA in the project area, and this should be corrected.
 - c. Pages 56, 145,157: A Township permit for land disturbing activities should be mentioned with an associated footnote directed to Castle Rock Township's Ordinance 7.10 in addition to the MPCA Construction Stormwater Permit.
 - d. Page 156: Under mitigation, please add "Township and" in front of "NPDES" in first sentence.
6. Page 80, Table 14. The table states that the Project Land Cover incorrectly includes 123.8 acres of wetland. Referencing the above identified WCA NOD's, the table should indicate 155.19 acres of wetland. In addition, the calculation of percentage given doesn't appear correct, as there are farmed wetland acreages overlapping with agricultural land acreage, minimizing the actual spatial extent of wetlands present throughout the project. Percentages should be derived by taking the full project area acreage, and then dividing the actual amount of acreage present for each land cover type. This will better reflect the amount of wetlands within the study area.
7. Page 81, Figure 30. The map shown here is a Public Utilities Commission layer that does not reflect the approved delineated wetlands associated within the project boundary. The EA should reflect the WCA approved delineated wetlands in all land cover mapping, unless the map clearly identifies that there is an absence of such.
8. Pages 83-85, Potential Impacts and Mitigation. While the intent is to avoid all delineated wetland acreage, and avoid impacts to the South Branch Vermillion River, there is no discussion here relating to how: screening fencing may encroach on delineated wetlands, non-native vegetative under panels may negatively impact stream corridor habitat and other considerations for water resources. The EA should be fully inclusive of all impacts to water resources located within the project boundary and their potential mitigation.
9. Page 83: Under Dakota County Regulations, shouldn't "Stormwater and Erosion Control" be replaced with "Shoreland and Floodplain Management"? While Dakota County's Ordinance No. 50 does include stormwater management standards, the ordinance is broader and includes many shoreland and floodplain management requirements besides stormwater management.
10. Pages 84,124,149, and 166: EA indicates that a draft AIMP (Agricultural Impact Management Plan) is in Appendix C. However, Appendix C, 4.3.18 states that a plan must be submitted and is

not actually a part of Appendix C. Should the text in the EA be updated to read that the applicant must submit an AIMP?

11. Page 152, Figure 44. The delineated wetland areas in this figure do not match the delineated wetland areas in Figure 46 on page 162. This map shows solar arrays placed in the delineated wetland areas in Figure 46. Figure 46 should reflect approved wetland acreages as shown in Figure 44.
12. Page 173: Staff suggests adding text in front of the trout stream verbiage to read “Just downstream of the immediate study area...”
13. Page 178: Revise language to “prevent weed and invasive species spread” under long term maintenance, first paragraph.

Appendix C Document

1. Page 9: Please add that permittee must obtain a Township permit for land disturbing activities.
2. Page 22: Please add that the Township shall also be provided site plans for review and approval.

Thank you for the opportunity to review and comment on the October 2025 EA document for the Castle Rock Solar, LCC in Castle Rock Township, Dakota County. Please feel free to contact Travis Thiel at travis.thiel@co.dakota.mn.us or 952.891.7546 if you have any questions or comments.

Sincerely,



Travis Thiel
VRWJPO Administrator



Kelly Perrine
VRWJPO Senior Watershed Specialist

Cc: Tom Wolf, VRWJPO Board Chair
Mike Slavik, Dakota County Board of Commissioners Board Chair