

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

June 5, 2025

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

RE: In the Matter of the Joint Application of Summit Lake Solar, LLC for a Solar Energy Generating System Site Permit and a Battery Energy Storage System Site Permit for the up to 200 MW Summit Lake Solar Facility and the up to 200 MW Battery Energy Storage System in Nobles County, Minnesota. Docket Number: IP-7153/GS-25-89 and IP-7153/ESS-25-88

Dear Sam Weaver,

The Minnesota Department of Natural Resources (DNR) has reviewed the joint site permit application for Summit Lake Solar (Applicant) to construct an up to 200 MW solar generating system (solar facility) and an up to 200 MW battery energy storage system (BESS). Based on the review of the application, the DNR offers the following comments regarding the potential environmental and wildlife impacts that should be considered in scoping for the Environmental Assessment (EA).

Security Fence

The permit application describes the security fencing around each grouping of solar arrays as seven-foot-tall topped with one foot of smooth wire. The DNR recommends the security fence reaches a minimum height of 10 feet to prevent white-tailed deer and other large wildlife from entering the facility. Our agency appreciates the Applicant using smooth wire on top of the fence instead of barbed wire. The final security fence plan should be designed in accordance with our agency's [Fencing Handbook for 10ft Woven Wire Deer Exclusion Fence](#). While the DNR understands the security fence design must follow the National Electrical Code, our agency requests the Applicant adhere to the DNR's fencing guidance to the maximum extent practicable.

Lighting

The DNR recommends the EA discuss measures to mitigate the impacts lighting will have on wildlife. LEDs are often installed at solar facilities and BESS sites due to their efficiency and cost competitiveness. LEDs tend to emit blue hue which can adversely affect wildlife and insects. The DNR's [*Commercial Solar Siting Guidance*](#) advises the nominal color temperature of lighting installed does not exceed 4,000 kelvin. The *Commercial Solar Siting Guidance* also recommends lighting is downlit and shielded to minimize blue hue, backlight, and glare.

Dust

The joint site permit application indicates the Applicant will use best management practices to suppress fugitive dust. The DNR advises against the use of dust suppression agents containing chloride. Chloride does 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 solar facility and BESS are operational.

Wildlife-Friendly Erosion Control

The EA should discuss the use of wildlife-friendly erosion control. Due to entanglement issues with small animals, the DNR recommends that erosion control blankets be limited to "bio-netting" or "natural netting" types, and specifically not products containing plastic mesh netting or other plastic components. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. These loose fibers could potentially re-suspend and make their way into nearby waterways. Our agency appreciates the Applicant commitment to using wildlife-friendly erosion control materials.

Vegetation Management Plan

The EA should discuss the construction and vegetation reestablishment phases to minimize stormwater runoff, stabilize soil, and support habitat. The DNR recommends the utilization of a vegetation management plan (VMP) throughout the permitted sites. The 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 DNR greatly appreciates the Applicant's commitment to meeting the Board of Water and Soil Resource's (BWSR) Habitat Friendly Solar Standards. The DNR looks forward to future coordination on the Applicant's VMP.

The DNR appreciates the opportunity to comment on the Summit Lake Solar project. Please contact me if you have questions about our agency's comments.

Sincerely,

**Martin
Donovan**

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Martin Donovan
Date: 2025.06.05
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Martin Donovan

Energy Review Planner

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651-259-5402

Attachments: Natural Heritage Review Letter

CC: Haley Byron, Minnesota Department of Natural Resources

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