

July 6, 2026

Chair Sieben
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101

RE: Docket Number 20266-232726 – BESS Project Cottage Grove

Dear, Chair Sieben and Commissioners.

The Applicant has indicated to the City that their project does not require local jurisdiction review however, the City appreciates the Applicant complying with minimum setback requirements and working to meet minimum stormwater standards. Typical projects of this scope require a Site Plan Review Application to be evaluated and reviewed by the City's Planning Commission and City Council. Our understanding is the Applicant is not planning to submit an official application with the city for local jurisdiction review therefore, the City submits the following comments for the Commission to consider including as conditions of approval of the Applicant's request.

The City of Cottage Grove has reviewed the proposed BESS Cottage Grove project plans and provides the following comments for consideration by the Commission in their review:

1. The city requires minimum landscape provided for projects within Industrial Zoning Districts. No Landscape plan has been provided in the submittal meeting the city's minimum landscape requirements therefore, the city requests the Applicant provide appropriate landscape screening as required to protect future development scenarios specifically on the north side of the project site. In addition, the city's landscape standards require no less than 15% of the site to be preserved as green/open space which has not been indicated on the Applicant's submittal.
2. The city has minimum stormwater management standards to be met. The attached stormwater management comments were provided to the Applicant on March 26, 2026, and are required to be addressed to ensure compliance with the city's standards and appropriate and efficient management with the addition of impervious surface.

The City appreciates the ability to provide comments on the application under review by the PUC and looks forward to reviewing updated plans.

Thank you for your consideration.

Sincerely,



Myron Bailey
Mayor, City of Cottage Grove



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MEMORANDUM

Date: 03/26/2026
To: Paul Sponholz, PE
From: Mike Boex, PE
Subject: LSP Battery Storage
City of Cottage Grove, MN
Project No.: 24X140120

This memo summarizes the review of site plan documents submitted by Westwood, dated 01/26/26 (received 03/18/26).

Sheet C100:

1. For clarity, list the vertical datum on the plans so it is clear what the elevations on the plans represent.

Sheet C300:

2. There is a note on the plans that states: *Project to use existing outfall. Outfall size and elevation to be verified prior to next submittal.*
 - a. Verification is important to confirm stormwater modeling requirements are met.
3. Notes 1 & 8 state:
 - a. *This plan is preliminary and subject to change. Items to be determined during detailed engineering include...drainage mitigation measures and sizing, parking areas,...existing road improvements, and grading.*
 - b. *Existing storm pipes and other underground utilities to be located... additional detail to be provided in more advanced future plan sets.*

The next submittal should have these items clarified and resolved.

4. Wetland:
 - a. Note 6 indicates that environmental data is pending the Wetland Delineation Study. Please provide copies of all wetland delineation and permitting information. The South Washington Watershed District (SWWD) is the LGU for the Wetland Conservation Act.
 - b. The South Washington Watershed District rules call for wetland buffers and other requirements based on wetland management classification and size. The following Table 5.3 is reprinted from the South Washington Watershed District rules and lists wetland criteria for quantity, quality and buffers. Please provide supporting documentation to show compliance with these criteria.

Table 5.3: Protection standards for wetland management classes			
Criteria	Protect	Manage 1	Manage 2
Water Quality			
Phosphorus Inflow Load (average annual pounds)	Maintain predevelopment	60% post- development load reduction	60% post- development load reduction
Water Quantity			
Storm bounce 10-year rainfall	Existing	Existing plus 1.0 foot	No limit
Discharge rate (inflow) 2-year & 100-year rainfall	Existing	Existing or less	Existing or less
Inundation period 1-year rainfall	Existing	Existing plus 2 days	Existing plus 7 days
Inundation period 2-year rainfall	Existing	Existing plus 14 days	Existing plus 14 days
Run-out control elevation (free flowing)	No change	0 to 1.0 feet above existing run out	0 to 4.0 feet above existing run out
Run-out control elevation (landlocked)	Based on SWWD Floodplain Map	Based on SWWD Floodplain Map	Based on SWWD Floodplain Map
Buffer Width			
Wetlands < 1 acre	75 feet	50 feet	25 feet
Wetlands > 1 acre	100 feet	75 feet	50 feet
Impact Mitigation			
Area replacement ratio	3:1	2:1	2:1
Volume replacement ratio	2:1	2:1	2:1

5. EOFs:

- a. An EOF location is identified for the southwest basin. Please label the EOF locations for the North Basin and Eastern Basin on this sheet as well. The locations and elevations for those basins should also be depicted on Sheet C400.

Sheet C400:

6. Freeboard: Please demonstrate that adequate freeboard is provided between the proposed stormwater basin HWLs and EOFs and the existing and proposed substations and battery storage equipment. The low adjacent grade elevation for all new structures must be a minimum of 3 feet above both the peak surface water elevation for the 100-year precipitation event and 2 feet above the emergency overflow elevation of any immediately adjacent new stormwater basin.
7. Seed the stormwater basins with native seed mixes and identify them on the plan.

Stormwater Comments:

8. HydroCAD:

- a. The HydroCAD model simulates 17.2 acres flowing directly to the combined stormwater basin (Pond 1PB) plus 1.9 acres inflow from the infiltration trench. Please simulate Basin 1PB as 3 separate stormwater detention basins with connecting pipes and overflow spillways in order to determine the HWL and outflow rates from each basin.

- b. Please include the inflow and outflow hydrograph plots in the HydroCAD reports so the model routings and stability can be reviewed.
9. Curve Numbers: The Curve Number 30 was used was simulating pervious areas in the existing and proposed conditions models. Section 6.1.2 of the City's Surface Water Management Plan recommends a CN value of 61 for site pervious areas that are likely mass graded and compacted. Please use a CN value of 61 for proposed conditions site pervious areas that are expected to be graded and compacted or explain why a CN value of 61 is not appropriate.
10. Soil Borings: Soil borings are required in the vicinity of proposed volume control BMPs. Borings are needed to identify soil conditions and the presence of groundwater or bedrock. Soil borings should extend a minimum of 5 feet below the lowest constructed elevation of proposed BMPs.
11. Infiltration Basins:
 - a. Include notes on the plans indicating how to stage construction and use low-impact earth moving equipment to avoid compaction of the soils under the infiltration system in order to improve the likelihood of successful infiltration.
 - b. Pretreatment: The City requires adequate pretreatment of stormwater runoff from development and redevelopment areas prior to discharge into infiltration basins and other waterbodies. The City prefers infiltration basins to be constructed to be "off-line" in order to have better long-term operation and less maintenance.
 - c. Infiltration/filtration media: Identify proposed section on the plans. For a successful vegetation establishment, the City recommends providing a Filter Topsoil Borrow (MnDOT 3877.2G) consisting of 70% sand (meeting the gradation requirements of 3126 "Fine Aggregate for Portland Cement Concrete") and 30% Grade 2 Compost (MnDOT 3890). Lower compost levels have typically proved difficult when establishing vegetation in basins.
 - d. Pipe outlets into infiltration basins or other overland discharge should have design velocities of 4 fps or less.
12. Post Construction Testing of Infiltration Required: The City will require post-construction testing to verify the infiltration/filtration rate and drawdown period of any infiltration/filtration basins. Please add the following to the infiltration basin plan notes: "Post construction testing of the infiltration rate and drawdown period will be required." Post construction testing should yield results of approximately twice the design rate, providing a safety factor. If test results exceed 8.3 inches per hour, soil should be amended to slow the infiltration rate below 8.3 inches per hour.
13. P8 Water Quality Model: The existing and proposed conditions P8 models appear to be using the wrong filtration efficiency values. Filtration efficiencies of 60% and 25% are being used for the P0% and P10% particle fractions. Please use the default infiltration basin values of 90% and 100% for these fractions or explain the approach.
14. Control erosion at construction sites: The City requires that applications for new or redevelopment activity include in their applications for City review, a SWPPP as required under the NPDES construction permit in effect at the time of review. Construction sites will be inspected to ensure compliance with the existing erosion and sediment control ordinance, Watershed District requirements, and with the construction site permit under NPDES Phase II MS4 rules. The City completes quality assurance inspections on all NPDES permits in the City (where the City is not the owner) twice each month. Erosion and sediment control best

management practices as outlined in the Minnesota Stormwater Manual will be required and must be shown on required submittals to the City for approval. Any street sweeping conducted by the City to remove erosional debris from streets will be charged to the owner of the property.

15. Models: Please note that digital copies of the final stormwater models and shapefiles or CAD drawings of existing and proposed drainage areas are to be submitted to the city once the review and revision process is complete.
16. A Stormwater Management Agreement will need to be executed for all BMPs installed with the site. The City will provide the agreement for signature prior to site grading.
17. NPDES Construction Stormwater Permit: Since the disturbed area of the redevelopment area exceeds 1 acre, an NPDES Construction Stormwater Permit is required.