

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

December 23, 2024

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

**RE: In the Matter of the Application of Snowshoe BESS, LLC for a Site Permit for the up to 150 MW
Snowshoe Energy Storage Project in Olmstead County, Minnesota.**

Dear Ms. Steinhauer,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application for the Snowshoe Energy Storage Project (Applicant) to construct an up to 150 MW battery energy storage system (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 4.1.4 describes the security fencing as a six-foot-tall chain linked fence topped with one to two feet of barbed 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 also advises against the use of barbed wire due to entanglement and injury concerns it can cause to wildlife. The DNR requests that the Applicant coordinate with our agency before finalizing the security fence design.

Lighting

The DNR recommends that any lighting installed is shielded and downward facing to minimize potential impacts related to illumination. LED lighting has become increasingly popular due to its efficiency and long lifespan, but they tend to emit blue light which can be harmful to wildlife. The DNR recommends choosing products that emit the lowest levels of blue hue, backlight, and glare possible.

Dust

Section 5.5.1.1 of the permit application indicates that the Applicant intends to employ dust suppression practices like watering or treating access roads to minimize fugitive dust at the project site. Dust control agents used to control fugitive dust levels 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 4.3.3 of the permit application indicates that disturbed areas from construction will be stabilized with temporary erosion control measures like hydro-mulch, silt fences, and sediment control logs until permanent vegetation has established. The DNR recommends using biodegradable erosion control materials. Erosion control blankets used should be limited to “bio-netting” or “natural netting” types and should not contain plastic components. Hydro-mulches used at the Project site should not contain synthetic fibers (plastic) and malachite green dyes because they pose toxicity concerns to wildlife.

The DNR appreciates the opportunity to provide EA scoping comments on the Snowshoe Energy Storage Project. If you have questions about the DNR’s comments, I may be contacted at martin.donovan@state.mn.us or 651-259-5402.

Sincerely,

Martin Donovan
Energy Review Planner

CC: Melissa Collins, Minnesota Department of Natural Resources

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