

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

July 10, 2025

Tessa Kothlow
Minnesota Public Utilities Commission
121 7th Place East
St. Paul, MN 55101

**RE: In the Matter of the Joint Application of Crane Energy Storage LLC and Sandhill Energy Storage LLC for their respective Site Permits for an up to 200 MW Battery Energy Storage System each in Olmsted County, Minnesota.
Docket Number: IP-7148/ESS-24-406, IP-7149/ESS-24-407**

Dear Tessa Kothlow,

The Minnesota Department of Natural Resources (DNR) has reviewed the joint site permit application for the Crane Energy Storage LLC and Sandhill Storage LLC (Applicant) to construct two independent battery energy storage systems (Project) in Olmsted County, each with a maximum capacity of 200 MW. Based on the review of the joint site permit 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 Fencing

The site permit application describes the security fence as a seven-foot-tall chain linked fence topped with one foot 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. The DNR will not issue a permit to take for a project with a fence height lower than 10 feet due to the challenges of safely removing wildlife from a facility. Our agency also advises against the use of barbed wire due to entanglement and injury concerns it can cause to wildlife.

Natural Heritage Review

The Applicant completed a Natural Heritage Review (MCE-2024-00874) for this Project. The EA should address whether the proposed Project has the potential to adversely affect the issues raised in the Natural Heritage Review letter and, if so, it should identify specific measures that will be taken to avoid

or minimize disturbances. Sufficient information should be provided so the DNR can determine whether a permit to take will be needed for any of the protected species mentioned in the letter.

Lighting

The DNR recommends the EA discuss measures to mitigate the impacts lighting will have on wildlife. LED lighting is often installed at battery energy storage system facilities and tend to emit blue hue which can adversely affect wildlife and insects. While we acknowledge the Project is not a commercial solar site, the DNR's [Commercial Solar Siting Guidance](#) is relevant in advising the nominal color temperature of lighting installed at facilities does not exceed 4,000 kelvin. The *Commercial Solar Siting Guidance* also recommends lighting is downlit and shielded lighting to minimize blue hue, backlight, and glare.

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 Project is 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.

Vegetation Management Plan

The EA should discuss the construction and vegetation reestablishment phases in the surrounding Project Boundary to minimize stormwater runoff, erosion, and support habitat. The Project's Vegetation Management Plan should be consistent with the DNR's [Prairie Establishment and Maintenance Technical Guidance for Solar Projects](#), which is applicable guidance for vegetation establishment and management for the surrounding Project Boundary.

The DNR appreciates the opportunity to comment on the Crane Energy Storage LLC and Sandhill Storage LLC projects. Please contact me if you have question about our agency's comments.

Sincerely,

Martin Donovan
Energy Review Planner
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651-259-5402

Attachments: Natural Heritage Review Letter

CC: Melissa Collins, Minnesota Department of Natural Resources

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