



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

May 8, 2025

Public Advisor
Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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.
PUC Docket No: IP-7138/ESS-24-279**

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) as reviewed the Environmental Assessment (EA) for the Snowshoe Energy Storage Project (Applicant) to construct a 150 MW battery energy storage system (Project). Based on the review of the EA, the DNR offers the following comments:

Security Fencing

The EA describes the security fence design as a six-foot-tall chain linked fence topped with two feet of barbed wire. Our agency advises the security fence reaches a minimum height of 10 feet to prevent large wildlife from entering the Project. The DNR also advises against the use of barbed wire due to entanglement and injury concerns in can cause wildlife. The Applicant should adhere to out agency's security fencing guidance detailed in the DNR's [Fencing Handbook For 10 ft Woven Wire Deer Exclusion Fence](#). Our agency supports special condition 5.9 of the draft site permit requiring the Permittee to design the final security fence in coordination with the DNR.

Lighting

The EA states lighting impacts can be minimized by using shielded and downward facing lighting fixtures and procuring lights that minimize blue hue. The DNR supports special condition 5.1 which directs the Permittee to use shielded and downward facing lighting and lights that minimize blue hue.

Wildlife-Friendly Erosion Control

The EA discusses how plastic erosion control materials can injure birds, fish, mammals, and reptiles. The DNR supports special condition 5.10 which requires the Permittee to use wildlife-friendly erosion control materials that do not contain plastic components.

Dust Control

The EA states that the project will generate fugitive dust from travel on unpaved roads, grading, and excavation. The EA discusses watering exposed surfaces at the Project site as a standard construction practice for reducing fugitive dust. The DNR supports special condition 5.11 of the draft site permit prohibiting the use of dust suppression agents that contain chloride.

Vegetation Management Plan

The DNR recommends continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's Vegetation Management Plan (VMP). Our agency supports special condition 5.6 of the draft site permit directing the Permittee to coordinate with the VMPWG. The VMP should prioritize planting a diverse mix of native grasses and forbs that suit site conditions to create habitat and improve soil health. The final VMP should be developed in accordance with the DNR's [Prairie Establishment & Maintenance Technical Guidance for Solar Projects](#) to the extent practicable for a BESS facility.

The DNR's review of the VMP identified a high percentage of non-native grasses. The DNR advises against planting non-native seed mixes because they can outcompete native plant species thus defeating the purpose of using adjacent native seed mixes. The DNR recommends replacing non-native species with additional native seeds that suit site conditions. The DNR looks forward to future coordination on the VMP and is happy to discuss substitutions with the Applicant to develop a seed mix that can meet vegetation establishment goals.

The DNR appreciates the opportunity to comment on the Snowshoe Energy Storage Project. Please contact me if you have questions about the DNR's comments.

Sincerely,

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CC: Melissa Collins, Minnesota Department of Natural Resources

Attachments: Natural Heritage Review Letter

Equal Opportunity Employer