

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

November 12, 2025

Public Advisor  
Consumers Affairs Office  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
St. Paul, MN 55101

**RE: In the Matter of the Application of North Star Energy Storage, LLC for an up to 100-megawatt Battery Energy Storage System Site Permit for the North Star Storage Project in Chisago County, Minnesota. PUC Docket Number: IP-7155/ESS-25-123**

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for North Star Energy Storage (Applicant) to construct an up to 100 MW battery energy storage system (Project). Based on the review of the EA and draft site permit (DSP), the DNR offers the following comments:

### **Blanding's Turtle**

As stated in the DNR's Natural Heritage Review Letter, Blanding's turtles, a state-listed threatened species, have been documented in the vicinity of the Project. The EA indicates that suitable habitat for Blanding's turtles is present in the Project area. The DNR supports special condition 5.10 of the DSP to mitigate impacts to Blanding's turtles.

### **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 and minimize entanglement and injury concerns barbed wire can cause to wildlife. The proposed Project is adjacent to the existing North Star Solar project, which is a large, fenced facility so wildlife's movement could already be impeded. Due to the existing solar facility and the presence of deer, the DNR requests the security fence reaches a minimum of 10 feet. The DNR supports special condition 5.7 of the DSP 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 as written.

## **Wildlife-Friendly Erosion Control**

The EA discusses how plastic erosion control materials can injure birds, fish, mammals, and reptiles. The DNR supports special condition 5.8 as written.

## **Dust Control**

The EA states that the Project will generate fugitive dust from travel on unpaved roads, grading, and excavation. The EA discusses applying water to exposed surfaces at the Project as a standard construction practice for reducing fugitive dust. The DNR supports special condition 5.9 as written.

## **Vegetation Management Plan**

The DNR recommends coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's Vegetation Management Plan (VMP). Our agency supports special condition 5.5 of the DSP as written. The VMP should prioritize planting a diverse mix of native grasses and forbs that suit site conditions to create habitat, improve soil health, and avoid erosion. While the Applicant has resubmitted their VMP from the permitted North Star Solar project, criteria for a complete VMP has changed since the original development of this plan and warrants additional updating and coordination. The DNR recommends the Applicant revise the VMP in accordance with our Agency's [Prairie Establishment & Maintenance Technical Guidance for Solar Projects](#) and the VMPWG's guidance to meet the criteria established in special condition 5.5.

The DNR appreciates the opportunity to comment on the North Star Energy Storage project. Please contact me if you have questions.

Sincerely,

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CC: Melissa Collins, Department of Natural Resources  
*Equal Opportunity Employer*