



U.S. Department of Energy Categorical Exclusion Determination Form

<u>Categorical Exclusion Number:</u>	CX-270902
<u>Loan Application Number:</u>	EIR0011
<u>Proposed Action Title:</u>	Lansing Battery Energy Storage System (BESS)
<u>Program of Field Office:</u>	Office of Energy Dominance Financing (EDF)
<u>Location(s) (City/County/State):</u>	Allamakee County, Iowa

Proposed Action Description:

Description of Categorically Excluded Action

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) may provide loan guarantees for energy infrastructure projects under section 1706 of Title XVII of the Energy Policy Act of 2005, as amended by the Inflation Reduction Act of 2022 (42 U.S.C. 16517) and the One Big Beautiful Bill Act (Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025)) (the Energy Dominance Financing or EDF Program). The EDF Program provides loan guarantees for projects that either (1) retool, repower, repurpose or replace energy infrastructure that has ceased operations; (2) enable operating energy infrastructure to increase capacity or output; or (3) support or enable the provision of known or forecastable electric supply at time intervals necessary to maintain or enhance grid reliability or other system adequacy needs (42 U.S.C. 16517(a)(2) and Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025)).

EDF is considering whether to issue a loan guarantee of a funding facility to Interstate Power and Light Company (IPL or the Applicant) pursuant to its authority under the EDF Program. In its application, IPL has identified the Lansing Battery Energy Storage System (BESS) (the Project) for inclusion in the funding facility that is the subject of EDF’s loan guarantee (the Proposed Action). IPL may request inclusion of multiple individual projects with independent utility in the funding facility that is the subject of the EDF loan guarantee; accordingly, EDF will complete environmental reviews pursuant to applicable and relevant environmental statutes for these projects prior to their inclusion in the funding facility that is the subject of EDF’s loan guarantee.

Project Description

Interstate Power and Light Company (IPL) is proposing to build the Lansing Battery Energy Storage System (BESS) (the Project) at the former Lansing Generating Station (coal-fired power plant) in Allamakee County, Iowa. The Project consists of a lithium-ion battery system and foundations, a new collector substation, installation of additional systems required to safely interconnect to the grid, and operation of the system. The Project will have an approximate capacity of 150-megawatts (MW). Project construction is anticipated to begin in March 2026, with operations starting in December 2026. The expected lifespan of the Project is 20 years and will extend beyond the scope of federal support.

The Project will be constructed on approximately 20 acres of land within the property of the former Lansing Generating Station, including the adjacent coal pile site. IPL owns all the land on which the Project, the collector substation, and all other components will be built. IPL closed the 275-MW coal-fired power plant in 2022 and fully decommissioned it in 2023. As part of the decommissioning activities, the power plant was demolished, the coal pile was fully excavated, and both locations were refilled to their current final grade. Due to the Project site's former use and recent decommissioning activities, the Project site is heavily disturbed and devoid of any natural/undisturbed habitats or vegetation communities. As such, no tree clearing or vegetation removal is required for the Project.

Construction of the BESS involves civil preparation of the site and installation of foundations, battery containers, and power conversion systems, as well as related equipment, wiring, and conduit to support their function. Major supporting equipment includes auxiliary transformers and switchboards to provide Alternating Current (AC) power for operations of the equipment, low voltage dry transformers and panelboards for lighting and control power, field network enclosures for



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control, light poles for illumination and security camera mounting, and perimeter fencing. All wiring within the BESS areas will be underground. The BESS utilizes a modular self-containerized system. The capacity of each battery cell is 306 Amp-hours and two cells are integrated into one module with eight modules integrated into one rack. There are five racks per container. Each container resembles a metal shipping container and is roughly 8 feet wide and 20 feet long. Each concrete foundation pad would hold two containers. The Project will consist of 200 battery containers on 100 concrete foundations. Each battery container includes fire detection and prevention systems to monitor and respond to battery fires. The balance of plant system includes heat, gas, and smoke detection systems to communicate alarms to operators and responders, as well as battery management and exhaust ventilation systems to prevent fires from occurring. Fire flow requirements are under discussion with local authorities and responding fire departments, but no onsite water storage or wells are planned. All water is expected to be brought to site by emergency vehicles, if required.

The Project will utilize the existing Lansing Plant Substation infrastructure from the former coal-fired power plant (also known as the ITC Lansing Switchyard), which is immediately adjacent to the Project. Additionally, the Project will include construction of a new collection substation, which entails civil preparation of the site, installation of equipment, and concrete foundations for the following structures: High Voltage (HV) circuit breaker, 161 kilovolt (kV) transformer, Low Voltage (LV) breakers, capacitor bank, control enclosure, riser stands, feeder structures, deadend, and static mast structures. The collection substation area will be separately fenced off from the BESS.

Overhead transmission lines and associated structures will tie the BESS to the new collection substation and the existing ITC Lansing Switchyard. Additional systems for the Project include battery cabinets connected to pad-mount inverter/transformer skids, switchgear, collector substation, and an approximately 200 feet of overhead power line that connects the Project to the electrical grid.

The Project will be designed and constructed in compliance with all applicable zoning and land use agreements. The following applicable permits have been obtained or are currently in process and are anticipated to be issued within a month and prior to start of construction:

- Issuance of the generating certificate by the IUC (Docket No. GCU-2025-0001)
- Construction Storm Water Permit
- Flood Plain Development Regulation Permit for Allamakee County
- Sovereign Lands and Flood Plain Development Permits from the Iowa Department of Natural Resources (IDNR)

There are existing storm water management features within the Project boundary that will be used to reduce storm water runoff from the Project. Runoff from the BESS will flow into grass lined ditches and will be collected in the detention basins sized to reduce peak runoff flows from a 24-hour/100-year storm event. The Project location is entirely outside of the Federal Emergency Management Agency (FEMA)-mapped 100-year floodplain. The floodplain permits referenced above are required by the IDNR for the portions of this facility that will be located within the FEMA-mapped 500-year floodplain. Per the Department of Energy's (DOE) floodplain regulations (10 CFR 1022), the Project is not considered a *critical action*, and therefore, the 500-year floodplain is not considered a *critical action floodplain*. As such, a DOE floodplain assessment and statement of finding is not required for the Project.

DOE's review of the Project in accordance with the Endangered Species Act determined that the Project would have *no effect* on the endangered higgins eye and sheepsnose mussel, proposed endangered salamander mussel, proposed threatened monarch butterfly, and the experimental population (non-essential) of whooping crane; the Project site contains no suitable habitat for these species and no in-water work is proposed. DOE determined that the Project *may affect, not likely to adversely affect* the proposed endangered tricolored bat. The USFWS concurred with this determination on September 30, 2025.



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In accordance with the National Historic Preservation Act (NHPA), DOE consulted with the Iowa State Historic Preservation Office (SHPO). The Iowa SHPO concurred with DOE’s finding of no historic properties affected for this Project on November 6, 2025. DOE identified and contacted twenty-nine (29) federally recognized Native American Indian Tribes (Tribes) to see if they have an interest in the Project: Apache Tribe of Oklahoma; Cheyenne River Sioux Tribe of the Cheyenne River Reservation, South Dakota; Citizen Potawatomi Nation, Oklahoma; Flandreau Santee Sioux Tribe of South Dakota; Ho-Chunk Nation of Wisconsin; Iowa Tribe of Kansas and Nebraska; Iowa Tribe of Oklahoma; Lower Sioux Indian Community in the State of Minnesota; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Omaha Tribe of Nebraska; Osage Nation; Otoe-Missouria Tribe of Indians, Oklahoma; Pawnee Nation of Oklahoma; Peoria Tribe of Indians of Oklahoma; Ponca Tribe of Indians of Oklahoma; Ponca Tribe of Nebraska; Prairie Band Potawatomi Nation; Prairie Island Indian Community in the State of Minnesota; Sac & Fox Nation of Missouri in Kansas and Nebraska; Sac & Fox Nation, Oklahoma; Sac & Fox Tribe of the Mississippi in Iowa; Santee Sioux Nation, Nebraska; Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota; Spirit Lake Tribe, North Dakota; Three Affiliated Tribes of the Fort Berthold Reservation, North Dakota; Upper Sioux Community, Minnesota; Winnebago Tribe of Nebraska; and Yankton Sioux Tribe of South Dakota. DOE received responses from the Flandreau Santee Sioux Tribe of South Dakota and the Miami Tribe of Oklahoma on October 10, 2025, and November 4, 2025, respectively. Both tribes stated they have no issues or objections to the Project. In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

Categorical Exclusion(s) Applied:

B4.11 - Electric power substations and interconnection facilities

B4.14 - Construction and operation of electrochemical-battery or flywheel energy storage

Choose an item.

Choose an item.

Choose an item.

Categorical Exclusion(s) Description:

B4.11 Electric Power Substations and Interconnection Facilities

Construction or modification of electric power substations or interconnection facilities (including, but not limited to, switching stations and support facilities).

B4.14 Construction and Operation of Electrochemical-Battery or Flywheel Energy Storage Systems

Construction, operation, upgrade, or decommissioning of an electrochemical-battery or flywheel energy storage system within a previously disturbed or developed area or within a small (as discussed at 10 CFR 1021.410(g)(2)) area contiguous to a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as land use and zoning requirements) in the proposed project area and the integral elements listed at the start of appendix B of this part, and would incorporate appropriate safety standards (including the current National Fire Protection Association 855, Standard for the Installation of Stationary Energy Storage Systems), design and construction standards, control technologies, and best management practices.

For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see [10 CFR 1021.102](#) and Appendix B to 10 CFR Part 1021, and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of [DOE's National Environmental Policy Act Implementing Procedures](#) (June 30, 2025).

Requirements and guidance in 10 CFR 1021.102 and DOE’s NEPA Implementing Procedures: (See full text in regulation and in Implementing Procedures)



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The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025).

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.

The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on [DOE's Section 109 webpage](#).]

Based on my review of the proposed action, as NEPA Compliance Officer, I have determined that the proposed action fits within the specified class(es) of action, the other requirements and guidance set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

Corporate Validation:

Name and Title (Print): Raja Sundararajan
EVP Chief Strategy Officer

Signature:

Date: 2/26/26

NEPA Compliance Officer:

Name and Title (Print): Todd Stribley
Director, Environmental Programs
Office of Energy Dominance Financing

Signature:

Date: 2/27/2026