

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

January 20, 2026

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 Northern States Power Company d/b/a Xcel Energy for an up to 135.5 MW Battery Energy Storage System Site Permit for the Blue Lake Battery Energy Storage Project in Scott County, Minnesota. PUC Docket Number: E002/ESS-25-214**

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) and draft site permit (DSP) for Xcel Energy's (Applicant) up to 135.5 MW Blue Lake Battery Energy Storage Project (Project) in Scott County. Based on the review of the EA and DSP, the DNR offers the following comments.

### **State-listed Species**

The Applicant completed a rare plant survey and determined there are no anticipated impacts to Louisiana broomrape, a state-listed threatened species, or other state-listed plant species. The survey contains sufficient information to determine the probable absence of state-listed species, and no further surveys are required. The DNR has reviewed the survey and appreciates the Applicant quickly addressing the DNR's concern regarding impacts to state-listed species.

### **Security Fence**

The DNR supports the security fence design as described in Chapter 2 of the EA. The EA indicates the Project's security fence could potentially impact wildlife. Due to the potential wildlife impacts, the DNR recommends a special condition directing the Permittee to coordinate the final fencing plan with the DNR, similar to special condition 5.7 included in the permitted Snowshoe Energy Storage Project (Docket ESS-24-279).

## **Vegetation Management Plan**

The DNR recommends the Applicant's Vegetation Management Plan (VMP) includes a more detailed explanation of the vegetation reestablishment phases in areas where vegetation removal is anticipated to occur in the surrounding project boundary. The DNR also advises the VMP includes an explanation of the types of plant species the Applicant intends to plant as part of the vegetation reestablishment process. The DNR recommends the Applicant plants a diverse mix of native plant species that suit site conditions to minimize erosion and storm runoff.

The DNR supports special condition 5.8 of the DSP as written, which details constructive criteria to help the Applicant achieve successful vegetation reestablishment. The DNR looks forward to future coordination on the VMP and is available to discuss vegetation management practices and seed mixes that can meet vegetation establishment goals.

## **Lighting**

The DNR supports standard condition 4.3.28 of the DSP as written to minimize the impacts of the Project's lighting.

## **Wildlife-Friendly Erosion Control**

The EA states plastic erosion control materials can injure birds, fish, mammals, and reptiles. The DNR supports standard condition 4.3.30 as written to ensure plastic-free erosion control materials are utilized.

## **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 standard condition 4.3.29 of the DSP as written.

The DNR appreciates the opportunity to comment on the Blue Lake Battery Energy Storage Project. Please contact me if you have questions.

Sincerely,

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CC: Melissa Collins, Department of Natural Resources  
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