

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

July 16, 2026

Jessica Livingston
Minnesota Public Utilities Commission
121 7th Place East
St. Paul, MN 55101

**RE: In the Matter of the Application of LSP CG Storage, LLC for a Site Permit for the up to 80 MW
Cottage Grove BESS Project in Cottage Grove, Washington County, Minnesota.
PUC Docket Number: IP7180/ESS-26-184**

Jessica Livingston,

The Minnesota Department of Natural Resources (DNR) has reviewed the site permit application and Environmental Assessment for the up to 80 MW Cottage Grove BESS Project. Based on the review, the DNR offers the following comment:

Blanding's turtle

As stated in the Natural Heritage Review letter (MCE-2025-00811-02), Blanding's turtles, a state-listed threatened species, have been documented in the vicinity of the BESS. Section 6.7.7.3 of the site permit application addresses the mitigative measures detailed in the Natural Heritage Review letter. However, the site permit application incorrectly states the mitigative measures in the letter are DNR recommendations. Rather, the DNR maintains that the mitigative measures in the letter are necessary to comply with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134) which prohibit the take of a threatened or endangered species without a permit.

The DNR appreciates the opportunity to clarify the project's record regarding mitigative measures for Blanding's turtles. Please contact me if you have questions.

Sincerely,

Martin

Donovan

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by Martin
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Date: 2026.07.16
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Energy Review Planner

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651-259-5402

CC: Melissa Collins, DNR

Attachments: Natural Heritage Review Letter

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