

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

December 16, 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 Joint Application of Crane Energy Storage LLC and Sandhill Energy Storage LLC for their respective Site Permits for an up to 200 MW Battery Energy Storage System each in Olmsted County, Minnesota.**

**PUC Docket Number: IP-7148/ESS-24-406, IP-7149/ESS-24-407**

Consumer Affairs Staff,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) and draft site permit (DSP) for the Crane Energy Storage and Sandhill Energy Storage (Applicant) to construct two independent 200 MW battery energy storage systems (Project) in Olmsted County. Based on the review of the EA and the DSP, the DNR offers the following comments:

### **Security Fencing**

The Applicant stated in their direct testimony that the Project's security fence will reach 10 feet. The DNR appreciates the Applicant's willingness to comply with our recommended minimum height of 10 feet for the security fence to minimize entanglement and injury concerns barbed wire can cause to wildlife. The DNR supports special condition 5.8 of the DSP requiring the Permittee to design the final security fence in coordination with the DNR.

### **Loggerhead Shrike**

The EA adequately addressed the DNR's concerns regarding the Loggerhead Shrike, a state-listed endangered species. The DNR has no further comments regarding the Loggerhead Shrike.

## **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 in the DSP.

## **Wildlife-Friendly Erosion Control**

The EA discusses how plastic erosion control materials can injure birds, fish, mammals, and reptiles. The DNR supports special condition 5.9 as written in the DSP.

## **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 5.10 as written in the DSP.

## **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 DSP directing the Permittee to coordinate with the VMPWG. The DNR appreciates the Applicant intends to plant a diverse seed mix of predominately native species. The DNR recommends the Applicant replace any non-native plant species with native plant species. 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 appreciates the opportunity to comment on the Crane Energy Storage and Sandhill Energy Storage projects. Please contact me if you have questions.

Sincerely,

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CC: Melissa Collins, Department of Natural Resources

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