



MINNESOTA DEPARTMENT OF NATURAL RESOURCES
CENTRAL OFFICE
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November 16, 2016

[Electronic transmittal]

Tricia DeBleeckere
Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Route Permit for the Black Dog Natural Gas Pipeline Project in Burnsville, Minnesota

PUC Docket Number: G002/GP-16-656

Dear Ms. DeBleeckere:

The Minnesota Department of Natural Resources (DNR) has reviewed the route permit application for the Black Dog Natural Gas Pipeline Project.

The DNR concurs with Xcel Energy's assessment of the project's potential to impact rare features. According to the assessment, there are no known occurrences of rare species within the project footprint and there will be no direct impacts to any identified DNR Native Plant Community.

Although there are no known occurrences of Blanding's turtles within an approximate one-mile radius of the project footprint, this rare turtle may be encountered on site. The DNR has provided Xcel Energy with a fact sheet and flyer that includes recommendations to minimize disturbance to this species. In particular, trenches should be checked for turtles before backfilling and, if applicable, wildlife friendly erosion control is recommended. If the proposed project will include dewatering, potential impacts to Blanding's turtles and calcareous fens will need to be adequately addressed.

The route permit application states that after construction is completed, vegetation will be reestablished by applying seed, mulch, and fertilizer mixtures specified by permit conditions, land managing agencies, and/or landowners. The DNR recommends using a native seed mix.

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The route permit application states that vegetation maintenance of the right-of-way will comply with any wildlife timing windows if specified by natural resource agencies. The DNR recommends that vegetation maintenance of the right-of-way occur outside of the avian nesting season (generally mid-May through July).

Any work that has the potential to adversely impact a calcareous fen must have a DNR approved fen management plan prior to conducting the work. The Black Dog Gas Pipeline project has the potential to impact the designated Black Dog Calcareous fen. The DNR understands that Xcel Energy is drafting a memorandum explaining how the project is not expected to adversely affect nearby fens. The DNR will determine the need for a calcareous fen management plan after it reviews this memorandum. Xcel Energy has indicated a willingness to coordinate with the DNR regarding its concerns about fen impacts. The DNR appreciates the opportunity to work with the company on this issue.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Warzecha". The signature is written in a cursive, flowing style.

Cynthia Warzecha
Principal Planner
Environmental Review Unit

cc: Bill Storm, Minnesota Department of Commerce
Ellen Heine, Xcel Energy

ERDB # 20170057

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