

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

March 4, 2025

Jim Sullivan
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**RE: In the Matter of the Application of Dairyland Power Cooperative for a Route Permit for the
Wabasha Relocation 161 kV Transmission Line Project in Wabasha County
PUC Docket Number: ET-3/TL-23-388**

Dear Jim Sullivan,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment for the Wabasha Relocation 161 kV Transmission Line Project (Project), proposed by Dairyland Power Cooperative (Applicant). Our agency offers the following comments:

Hydrology: Karst

The Project is within a region prone to surface karst feature development, the DNR recommends including a special permit condition requiring a Karst Survey Plan and the development of a Karst Contingency Plan prior to construction. The Applicant must coordinate closely with DNR geotechnical expert, John Barry (john.barry@state.mn.us) to ensure that pole structures are properly supported as well as to limit any potential impact and pollution of this sensitive hydrogeology.

Rare Resources: Natural Heritage Reviews

Two Natural Heritage Reviews have been completed for this Project via the Minnesota Conservation Explorer (MCE): MCE 2023-00935 provided a review of the proposed alignment; MCE 2024-00881 provided a review of the proposed alternatives. The permit should refer to both letters and the conditions listed in them to minimize or avoid impacts to state-listed species and other rare resources. This includes, but is not limited to, the following:

Calcareous Fens

A calcareous fen has been documented in the vicinity of the Project. The DNR requests a special permit condition, similar to TL-23-159, that the Applicant must coordinate with the DNR to determine if any impacts will occur during the Project. If the Project is anticipated to impact the calcareous fen, the Applicant must develop a Calcareous Fen Management Plan in coordination with the DNR, as specified in Minn. Stat. § 103G.223.

Please note that the boundary of the calcareous fen is considered to be the boundary of the entire wetland complex where it is located. Any structures placed within the vicinity of the fen should be monitored for artesian conditions.

State-listed Species

The Applicant has been in coordination with the DNR and has agreed to follow the avoidance measures listed in the attached email (MCE2023-00935-Avoidance). We request the PUC include permit conditions that require the Applicant to complete coordination with the DNR regarding rare species, including following the stated avoidance measures and the Takings Permit process if needed, before Project activities begin.

Turtle Species

Blanding's and wood turtles have been documented in the vicinity and the Project and avoidance measures are required.

Snake Species

Timber rattlesnakes have been documented in the vicinity of the Project and avoidance measures are required.

Plant Species

Seaside three-awn, clasping milkweed, beach heather, and Davis' sedge have been documented in the vicinity of the Project and avoidance measures are required.

The Natural Heritage Review letters are based on the Applicant's proposed routes and are valid for one year. Please keep in mind that the final route may need to be re-evaluated, and any route changes would require an updated review to ensure rare resources are identified and any potential impacts are mitigated. The Applicant should also submit plans for temporary access roads and staging areas.

Facility Lighting

The DNR recommends including a special permit condition, similar to TL-23-159, to utilize downlit and shielded lighting and minimize blue hue to reduce harm to birds, insects, and other animals. Potential Project impacts related to illuminated facilities can be avoided or minimized by using shielded and downward facing lighting that also minimizes blue hue.

Dust Control

The DNR recommends including a special permit condition, similar to TL-23-159, to avoid products containing calcium chloride or magnesium chloride, which are often used for dust control. Chloride products that are released into the environment do not break down, and instead accumulate to levels that are toxic to plants and wildlife.

Wildlife-Friendly Erosion Control

Due to entanglement issues with small animals, the DNR recommends including a special permit condition, similar to TL-23-159, that erosion control blankets be limited to “bio-netting” or “natural netting” types, and specifically not products containing plastic mesh netting or other plastic components. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. These loose fibers could potentially re-suspend and make their way into waterways.

Water Appropriation

A DNR Water Appropriation Permit is required for dewatering activities during construction if the water pumped exceeds 10,000 gallons in a day, and/or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced time for review, may be used for the dewatering if the dewatering volume is less than 50 million gallons and the time of the appropriation is less than one year. MPARS can be used to apply for a DNR Water Appropriation Permit.

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Wabasha Relocation 161 kV Transmission Line Project. Please contact me if you have questions about our agency’s comments.

Sincerely,

Samantha Bump
Energy Projects Planner
Samantha.Bump@state.mn.us
651.259.5999

Attachments: Natural Heritage Review Letters (2)
Natural Heritage Avoidance Coordination

CC: Melissa Collins

Equal Opportunity Employer