



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

May 13, 2025

Consumer Affairs Office
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
Beaver Creek 161-kV Transmission Line in Fillmore County, Minnesota
PUC Docket Number: ET3/TL-24-95**

Dear Public Utilities Commission,

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

Natural Heritage Review

A Natural Heritage Review has been completed for this Project via the Minnesota Conservation Explorer (MCE 2024-00334). The DNR recommends including a special permit condition that the Applicant will comply with applicable requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134). This includes following the conditions listed in the letter to minimize or avoid impacts to state-listed species and other rare resources that have the potential to be impacted by the Project.

Calcareous Fen

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 work with DNR to determine if any impacts will occur during any phase of the project. If the Project is anticipated to impact any

calcareous fens, the Applicant must develop a Calcareous Fen Management Plan in coordination with the DNR, as specified in Minn. Stat. § 103G.223.

Hydrology: Karst

A portion of the project is within a region prone to karst surface feature development and sinkholes have been documented within and in close proximity to the Project. The Applicant should inspect the project area for karst features before conducting any construction activities, and report any new karst features to the [DNR Karst Features Inventory](#). Excavation and the placement of footings have the potential to encounter unstable conditions. We strongly recommend conducting a geotechnical evaluation prior to construction activities given the substantial size of the pole structures. Please refer to the [Karst Page within the Minnesota Stormwater Manual](#) for Best Management Practices when working in these areas as well as further information on karst topography. Given the sensitive nature of working in an area with karst features, the DNR recommends including a special permit condition requiring a Karst Survey Plan prior to construction. At the first sign of any spill within or near a karst feature, the Applicant must contact the [Minnesota Duty Officer](#) at 800-422-0798 or 651-649-5451.

Dust Control

The DNR recommends including a special permit condition, similar to TL-22-415, 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-22-415, 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. [MNDNR Permitting and Reporting System \(MPARS\)](#) 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 Beaver Creek 161 kV Transmission Line Project. Please contact me if you have questions about our agency's comments.

Sincerely,

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Attachments: NHIS Letter

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