

Appendix B

Agency Correspondence



September 3, 2020

[Address Block]

RE: Requesting Comments on a 161-kilovolt Transmission Line in Cottonwood, Watonwan, and Martin Counties, Minnesota

Dear [Name],

Big Bend Wind, LLC (“Big Bend”) and Red Rock Solar, LLC (“Red Rock”), are indirect wholly-owned subsidiaries of Apex Clean Energy Holdings, LLC (“Apex”), and are proposing to construct up to 335 megawatts (“MW”) of new renewable energy generation in Cottonwood and Watonwan Counties, Minnesota. As proposed, the renewable generation could consist of up to 314 MWs of wind (the “Wind Farm”), or a combination of wind and up to 60 MWs of solar (the “Solar Project”). In addition, Big Bend is proposing to construct a 161 kilovolt (“kV”) transmission line and associated facilities (“Transmission Line”) to support the Wind Farm and Solar Project.

The Transmission Line is needed to interconnect the Wind Farm and Solar Project to the transmission grid. The Transmission Line will consist of approximately 18 miles of 161 kV transmission line located in Cottonwood, Watonwan and Martin Counties, Minnesota. As proposed, the Transmission Line will extend south from the Wind Farm’s project substation to an existing 345 kV transmission line near the Xcel Energy Crandall 345 kV Switching Station in Martin County. A step-up substation will be constructed to connect the proposed Transmission Line to the existing 345 kV transmission system.

The proposed route for the Transmission Line will start from the Wind Farm’s project substation, located approximately 1.25 miles northwest of the Town of Mountain Lake, and terminate approximately ten miles southeast of Mountain Lake. Big Bend proposes to use 70 to 120-foot tall steel or laminate wood structures with spans of approximately 400 to 650 feet. Big Bend is planning to obtain a 100-foot wide permanent right-of-way on parcel lines and 150-foot wide permanent right-of-way when adjacent to road right-of-way, supporting the path of the 161kV transmission line. Big Bend is currently acquiring easements from landowners in order to secure the right-of-way required for the Transmission Line.

The enclosed Transmission Line Project Area map depicts the area within which the route may be proposed. Big Bend must obtain two approvals from the Minnesota Public Utilities Commission (“Commission”) to construct the proposed Transmission Line: a Certificate of Need and a Route Permit. In the Certificate of Need proceeding, the Commission determines whether a proposed transmission line project is needed and the appropriate size, configuration, and timing. If the



Commission determines that the Transmission Line is needed, the Commission will then determine the route for the Transmission Line.

To facilitate your review, we have enclosed a map of that depicts the area within which routes may be proposed. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

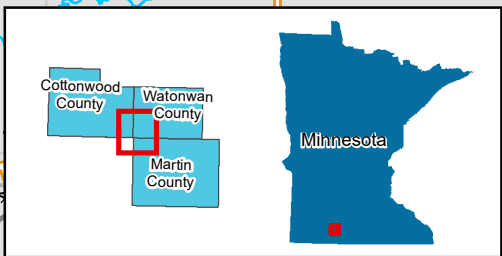
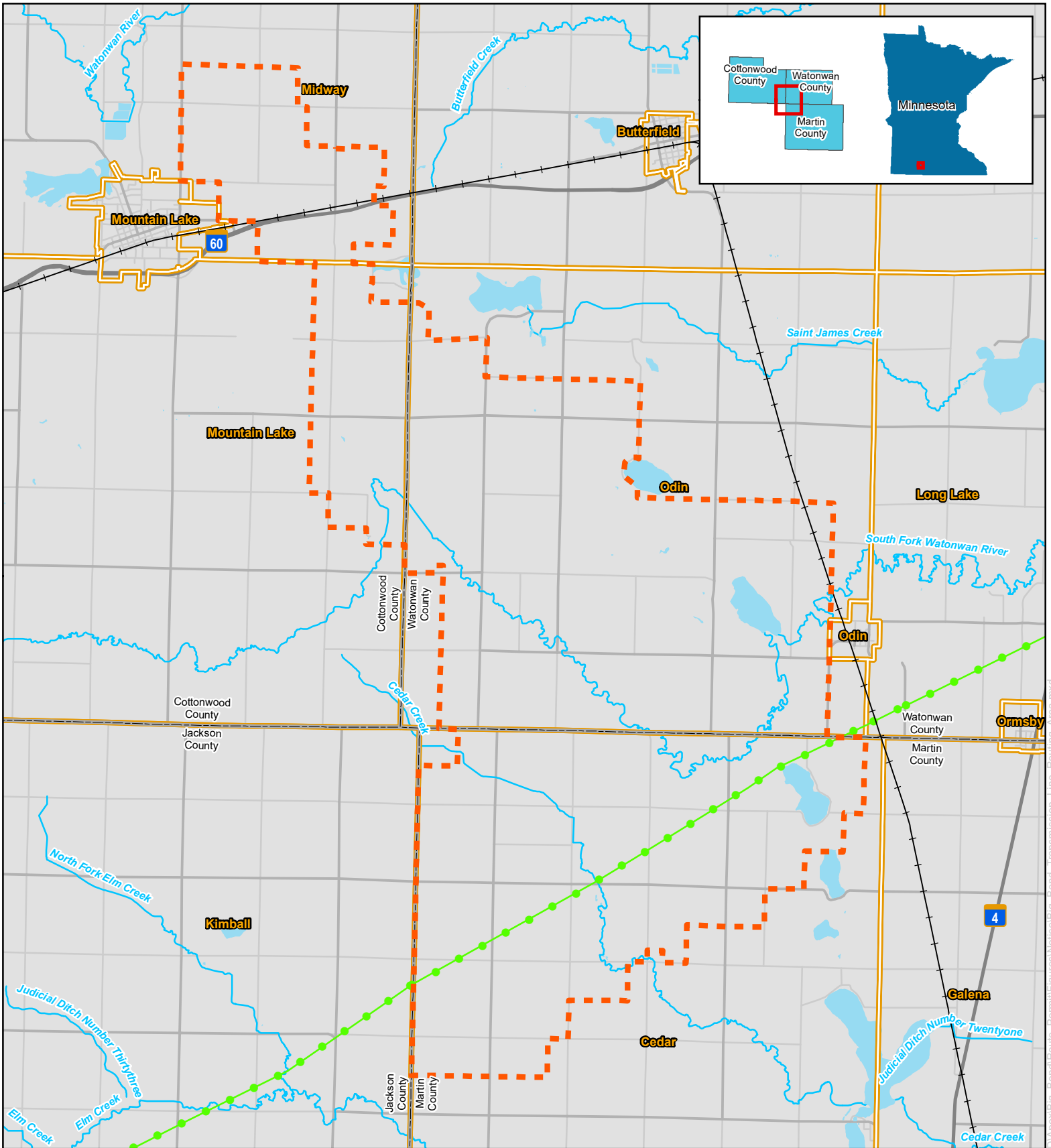
If you require further information or have questions regarding this matter, please contact me at (484) 364-9298 or Dylan.ikkala@apexcleanenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Dylan Ikkala", is positioned below the "Sincerely," text.

Dylan Ikkala
Development Manager
Apex Clean Energy

Enc. Transmission Line Project Area Map



BIG BEND
WIND

0 1 Miles

1:105,000

For Environmental Review Purposes Only

Big Bend Transmission Line Routing Area Cottonwood, Watonwan and Martin Counties, Minnesota

- Transmission Line Routing Area
- Existing 345 kV Transmission Line
- Railroad
- City/Township
- County Boundary
- NHD Named Stream
- NHD Waterbody

Dylan Ikkala

From: Marquardt, Shauna R <Shauna_Marquardt@fws.gov>
Sent: Thursday, October 1, 2020 1:46 PM
To: Dylan Ikkala
Subject: RE: [EXTERNAL] RE: Transmission Line in Cottonwood, Watonwan, and Martin Counties
Attachments: Fig01_BB_Project_Location.pdf; Big Bend Wind Farm Project Notification Letters_05082020.docx; Red_Rock_Project_Area_20200518.pdf; Red Rock Solar Project Notification Letters_05192020.docx

Hi Dylan,

Because of current workload management, we are not able to provide the level of initial technical assessment that you are requesting for the three parts of this project. We now rely on available web-based tools to provide initial technical assistance. You can access the information you're looking for regarding federally listed species that could occur in your project area through our Information for Planning and Consultation (IPaC) system (<https://ecos.fws.gov/ipac/>). Through IPaC, you will be able to enter geographic and activity details for your project to generate an Official Species List that provides a list of federally listed species and designated critical habitat that may be impacted by your project. The species list will also include any species proposed for listing and any areas proposed as critical habitat that overlap with the project area. You then can refer to our [Section 7 website](#) for guidance and [technical assistance](#), including [step-by-step instructions](#) for making effects determinations for each species that might be present. If there is no habitat for the species that IPaC indicates, then the appropriate determination is No Effect. You do not need to consult further with us for No Effect determinations, simply document the logic and conclusion for your files.

Should you determine that listed species or other federal trust resources could occur in your project area and would like to coordinate on a path forward under for ESA consultation and permitting under section 7 or section 10, you can contact me for additional assistance.

Shauna Marquardt (she/her/hers)
Assistant Field Supervisor
U.S. Fish and Wildlife Service
Minnesota-Wisconsin Ecological Services Field Office
573-239-3293

IPaC resource list

This report is a summary of resources referred to as trust resources. It is expected to be used primarily outside of the project area. However, determining the location of gathering additional information proposed activities.

Below is a summary of resources

jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

LOGIN.GOV SIGN IN MIGRATION

In mid-to-late December 2020, IPaC will change its sign-in process to use Login.gov. At that time, you will need an account with Login.gov with the same email address you are currently using to log into IPaC. This change includes Google login users.

ECOS applications other than IPaC have already switched to Login.gov. Until IPaC moves to Login.gov in December, you will need to sign in to both platforms separately.

collectively known or identified resources that occur within the project area. This process usually requires coordination and timing of activities with the appropriate office(s) with

Location

Cottonwood, Martin and Watonwan counties, Minnesota



Local office

Minnesota-Wisconsin Ecological Services Field Office

(952) 252-0092

(952) 646-2873

MAILING ADDRESS

4101 American Blvd E
Bloomington, MN 55425-1665

PHYSICAL ADDRESS

4101 American Blvd E
-
Bloomington, MN 55425-1665

<http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9045	Threatened

Flowering Plants

NAME	STATUS
Prairie Bush-clover <i>Lespedeza leptostachya</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4458	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
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Bald Eagle *Haliaeetus leucocephalus*

Breeds Dec 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Franklin's Gull *Leucophaeus pipixcan*

Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Lesser Yellowlegs *Tringa flavipes*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

Semipalmated Sandpiper *Calidris pusilla*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

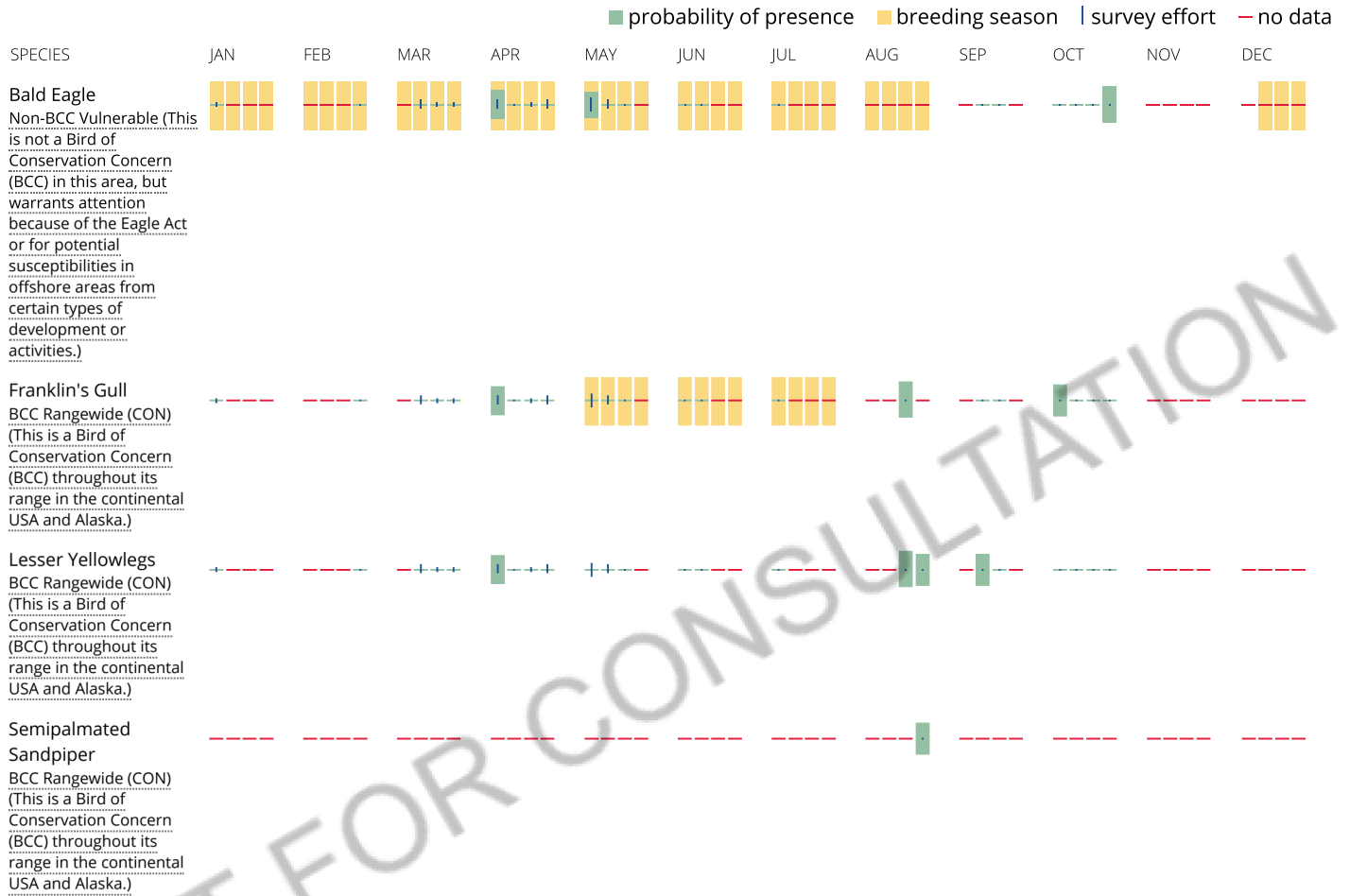
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

[PEM1A](#)
[PEM1Af](#)
[PEM1C](#)
[PEM1B](#)
[PEM1Cx](#)

FRESHWATER FORESTED/SHRUB WETLAND

[PFO1A](#)
[PFO1C](#)
[PSS1C](#)
[PSS1A](#)
[PFO1Cx](#)

FRESHWATER POND

[PUBKx](#)
[PUBF](#)

RIVERINE

[R2UBG](#)
[R4SBC](#)
[R2UBH](#)
[R2UBGx](#)
[R2UBHx](#)
[R4SBCx](#)
[R5UBFx](#)
[R5UBH](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Dylan Ikkala

From: Boettcher, Joanne (DNR) <Joanne.Boettcher@state.mn.us>
Sent: Monday, October 5, 2020 10:47 AM
To: Dylan Ikkala
Cc: Kresko, Tom (DNR); Girolamo, Daniel (DNR); Wigen, Katie (DNR); Beste, Brent (DNR); Gelvin-Innvaer, Lisa A (DNR); Benage, Megan (DNR); Doorenbos, Ryan D (DNR); Mackenthun, Scott (DNR); Nyborg, Brian (DNR); Netland, Cory (DNR); Gieseke, Tim (DNR); Warzecha, Cynthia (DNR)
Subject: Big Bend HVTL - early coordination comments
Attachments: Erosion_InvasiveSpecies_StandardGuidance_20200707.pdf

Hi Dylan, Please find DNR early coordination comments below for the proposed Big Bend HVTL (review request letter dated 9/3/20 and shapefiles submitted 9/10/20):

- Natural resource GIS data layers referenced in these comments are available on the [Minnesota Geospatial Commons](#).
- NHIS review identifies instances of rare species, communities, and features and required and/or recommended avoidance strategies. NHIS review must be completed and issues resolved prior to the PUC application being submitted. NHIS reviews are currently taking about two months to complete and are valid for one year. Depending on the results of that review, additional early coordination review could be warranted.
- Any public water crossings will require a [Utility Crossing License](#).
- For water body or other crossings of substantial habitat and/or with known or suspected large avian flight paths, we recommend the use of yellow-colored [swan flight diverters](#), installed per manufacture's recommendations. **Once a final route is selected and you have planned for the flight diverters, please submit those plans for DNR review.**
- A number of stream crossings will potentially be made, depending on the selected route. We encourage the project proposer to minimize the number of stream crossings, particularly over stream areas with more areas of habitat.
- Native mussels have been identified in several of the streams in the project area. The project needs to avoid in-stream impacts and implement effective erosion control adjacent streams with mussels.
- We recommend avoiding native prairies remnants as these areas are rare on the landscape and typically have several rare species associated with them. The primary line currently runs across the S Watonwan River, through a native prairie remnant. We recommend the project utilizing the alternate path that avoids this area.
- Any work within the ordinary high water level, dewatering, water appropriations or other work that impacts public waters or ground water (and meets thresholds) will require [Public Waters Work Permit](#).
- The proposed route crosses at least one area identified as a sensitive groundwater area. Impacts to groundwater should be avoided.
- We don't recommend placing any infrastructure in the flood zone. If you decide to pursue this specific location, ensure you are meeting any local floodplain requirements.
- The proposed route crosses areas identified as National Wetlands Inventory wetlands. We recommend avoiding these areas to avoid installation and operational problems as well as to minimize environmental impacts. Ensure any wetland and WCA requirements are fulfilled by contacting the Wetland Conservation Act authority, typically the county.

- The proposed route currently crosses JD1. A large area around JD1 is a historical wetland/drained lakebed and is identified as a large restorable wetland. The soils in this area are identified as “very poorly drained”. You may want to consider the impact of the soils, water table, and potential to restore water storage in this location on the project.
- Also near the proposed JD1 crossing, the route is within about a mile of Regehr and Sulem Lake WMAs.
- We recommend wildlife-friendly erosion control and invasive species prevention best practices throughout the project (see attachment).
- **If the route changes, when the proposed routes are further narrowed down, and/or when the final route is selected, please send in an updated shapefile and brief narrative describing the route change.**

I will continue to be your point of contact for DNR environmental review until the PUC permit application is submitted. At that time, Cynthia Warzecha will become your point of contact. Please let me know if you have any questions about these comments.

Thanks,

Joanne Boettcher
Regional Environmental Assessment Ecologist
MNDNR – Mankato
(507) 389-8813



Dylan Ikkala

From: Nick Klisch <Nick.Klisch@co.cottonwood.mn.us>
Sent: Wednesday, September 9, 2020 11:30 AM
To: Dylan Ikkala
Cc: Alex Schultz
Subject: Big Bend Transmission Line
Attachments: 161 KW Transmission Line.pdf

Dylan, I received the attached request for comments in regards to the proposed transmission line. Below are my comments on behalf of the Cottonwood County Highway Department.

1. Cottonwood County Highway Department is supportive of this project and the clean energy and positive economic impacts that result from it.
2. Cottonwood County Highway Department is supportive of the fact that the transmission lines will be placed on private easements rather than road right of way.
3. Cottonwood County Highway Department would ask that Big Bend Wind work with the proper Road Authority (Township, County, or State Highway Departments) when placing Transmission Lines adjacent to Road Right-of-Way in order to determine acceptable setbacks from the Road Right-of-way as to prevent the need to relocate the Transmission Line in the event of a future road improvement project and also to ensure the safety of the traveling public. The need to determine an acceptable setback is that the proposed structures are 70 to 120 feet in height with an unknown width dimension (much larger than current in-place transmission line structures). Acceptable setbacks could be determined when the structure size, type, and exact placement of each structure are known. My main concern within Cottonwood County is the 1.5 miles of transmission line proposed adjacent to County State Aid Highway 1 just north of Mountain Lake and a small section of the proposed transmission line adjacent to County State Aid Highway 27 on the east side of Mountain Lake, but I am confident that Cottonwood County Highway Department can work with Big Bend to accommodate the proposed route.

Feel free to contact me with any questions.

Thank you!

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