

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

December 3, 2024

Larry Hartman
Minnesota Department of Commerce
85 Seventh Place East, Suite 280
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
PUC Docket Number: ET3/TL-24-95**

Dear Larry Hartman,

The Minnesota Department of Natural Resources (DNR) has reviewed the application for a Route Permit for the Beaver Creek 161 kV Transmission Line (project) in Fillmore County, proposed by Dairyland Power Cooperative (applicant). Our agency offers the following comments:

Hydrology: Karst

As a portion of 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. There are two sinkholes documented in or directly adjacent to the project ROW and several other sinkholes documented within a mile. Please note that this area partially overlaps with [previous dye trace studies](#) that show an extensive blind valley spring and connected cave systems in this area. The full extent of these underground features is unknown. As such, the applicant must coordinate closely with geotechnical experts to ensure that pole structures are properly supported as well as to limit any potential impact and pollution of this sensitive hydrogeology.

Rare Features: Natural Heritage Review

As stated in the Natural Heritage Letter (MCE 2024-00334), 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 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.

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 and lighting that 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.

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,

Samantha Bump
Energy Projects Planner
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651.259.5999

Attachments: Natural Heritage Letter

CC: Melissa Collins

Equal Opportunity Employer