

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

June 10, 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 Xcel Energy for a Certificate of Need and Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota
Docket Number: E-002/TL-23-157

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the Draft Environmental Impact Statement (DEIS) for the Mankato to Mississippi River Transmission Line (Project), proposed by Xcel Energy. Our agency offers the following comments:

Route Preferences and Recommendations

Segment 17

To mitigate potential impacts on native plant communities, state-administered lands, and public waters, Route Segment 17 (Hwy 14) is preferred. If Segment 17 is not selected, the DNR strongly encourages double-circuiting the final route as much as feasible to minimize long-term impacts on natural resources.

Alternative 1J

The DNR highly encourages avoiding the use of route alternative 1J. This route alternative does not follow an existing transmission line and crosses between multiple areas known for their waterfowl population including Ballantyne, Duck, and Madison Lakes, all Lakes of Outstanding Biological Significance, and Gilfillan Lake Wildlife Management Area (WMA). This route would create a hazard for the bird populations in and migrating through the area.

Segment 2 North and South: Faribault WMA

Segment 2 North creates a new and additional transmission line in the vicinity of the Faribault WMA, which is not preferred. The DNR supports Segment 2 South near the Faribault WMA as it follows 235th Street East and has the potential to be double-circuited with an existing transmission line.

Segment 3/Segment4/Alternative 15: Zumbro River

The DNR supports the crossing of the Zumbro River that co-locates with the existing CapX transmission line. If the Right-of-Way (ROW) expansion or temporary staging areas are needed on the east side of the Zumbro Crossing, we request to limit the amount of tree removal within the Minnesota Biological Survey (MBS) Site of Moderate Biodiversity Significance and riparian zone of the Zumbro River.

Impact Mitigation and Permit Conditions

Rare Resources: Natural Heritage Review

Multiple Natural Heritage Reviews has been completed for the Project (MCE 2023-00832, 2025-00029, and 2025-00030). 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 Natural Heritage letters to minimize or avoid impacts to state-listed species and other rare resources that have the potential to be impacted by the Project.

State-listed Species

Several state-listed species have been documented throughout the Project area. The DEIS adequately addresses mitigation measures for these species.

Calcareous Fen

Calcareous fens have 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 the 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.

MBS Sites of Biodiversity Significance and DNR Native Plant Communities

Several MBS Sites of Biodiversity Significance and DNR Native Plant Communities have been documented throughout the project. The Natural Heritage letter addresses actions to mitigate disturbance to these ecologically significant areas which have been adequately addressed in the DEIS.

Coordination with the United States Fish and Wildlife Service (USFWS)

We recommend that coordination with USFWS regarding avoidance and permitting of federally protected species on the selected route be included as a permit condition.

Avian Flight Diverters

To prevent avian collisions due to visibility issues, the DNR recommends including a special permit condition, similar to TL-22-415, that the Applicant will coordinate with the DNR to determine appropriate locations for avian flight diverters after the route is finalized. Generally, the avian flight diverters will be needed at river crossings, fragmented forested patches, and near lakes and wetlands. The use of avian flight diverters minimizes the number of bird collisions with the transmission lines. Standard transmission line design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices.

Vegetation Management Plan

The DNR recommends continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's Vegetation Management Plan (VMP). Our agency also supports a special permit condition to require the Applicant to develop a VMP in coordination with the VMPWG. The VMP should specifically address vegetation removal timing and avoiding removal in floodplains and near designated trout streams.

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.

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.

Facility Lighting

The DNR recommends including a special permit condition, similar to TL-22-415, 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.

State Lands

The Project crosses multiple DNR-administered lands that will require a utility license from the DNR. The utility license review will identify potential natural resource and recreation concerns. The utility license to cross state lands review also determines deed, contract, funding, or other restrictions on state lands. Such restrictions could impact licensing and routing of the transmission line. Some DNR-administered lands have been purchased using funds that put restrictions on the lands. Before the DNR can grant a utility license over state lands with a funding restriction, our agency must receive written approval from the funding provider. The DNR will identify if and where there are funding restrictions on state lands. The funding provider review can take up to a year or more after which approval may or may not be granted.

Public Waters

Public waters are designated as such to indicate the lakes, wetlands, and watercourses over which DNR has regulatory jurisdiction. The Project proposes to cross multiple public waters, so a DNR Public Waters Work Permit or a DNR License to Cross would be required.

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 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. A DNR Water Appropriation Permit can be applied for in the [MNDNR Permitting and Reporting System \(MPARS\)](#).

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Mankato to Mississippi River 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
651.259.5828

Attachments: Natural Heritage Letters (MCE 2023-00832, 2025-00029, and 2025-00030)

Equal Opportunity Employer