



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

July 03, 2024

Jenna Ness
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

**RE: In the Matter of the Environmental Assessment for the Alexandria to Big Oaks 345-kV
Transmission Project in Central Minnesota, PUC Docket Number: TL-23-159**

Dear Ms. Ness,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment for the Alexandria to Big Oaks 345-kV Transmission Project in Central Minnesota. Our agency offers the following comments.

Route Alternatives

We greatly appreciate Xcel Energy's consideration and response to previous DNR comments and seeking to find a mutually-acceptable solution. Their creative problem-solving has introduced less impactful alternatives than DNR's previous solutions due to their ability and willingness to relocate the existing 115 kV line out of the floodway and off the island in the Mississippi River. DNR thanks Matthew Langan for his testimony at the May 30, 2024, Public Utilities Commission hearing, and for introducing two new alternatives.

Based on Mr. Langan's May 30, 2024, testimony and associated information, the DNR's preferred alternative is now DNR Option 2B. This alternative meets our stated priorities regarding natural resource impacts in the following manner:

- a. Maintaining only one crossing of the Mississippi River within the wild and scenic river district;
- b. Minimizing tree removal and vegetation clearing along the Mississippi River bluff and within the mapped Minnesota Biological Survey (MBS) Sites of Biodiversity Significance and DNR Native Plant Community (NPC), FDs37 - Southern Dry-Mesic Oak (Maple) Woodland. Option 2B crosses the river and then continues straight, away from the river in an area with the fewest trees and least amount of impact to the native vegetation, whereas Western Option B crosses the river and then turns north to closely follow the edge of the Mississippi River bluff for over a mile within an MBS Site and NPC. This option would require extensive tree clearing along the bluff, which could pose issues for long-term bluff stability and may not be compatible with local bluff

impact zone ordinances. Western Option B would also create a more significant barrier for migratory birds by running the transmission line along the edge of the river bluff for over a mile. Placing large transmission lines and tree clearing along the river would also negatively impact the visual quality of the wild and scenic river.

- c. Removing the existing transmission line from the island in the Mississippi River that is also mapped as an MBS Site and DNR NPC FFs68a - Silver Maple - (Virginia Creeper) Floodplain Forest that provides important wildlife habitat; and
- d. Relocating the existing transmission line out of the floodway removing ongoing maintenance and stability challenges.

The DNR prefers utilizing pole structures for the Mississippi River crossing that place transmission lines side by side rather than stacked. While this option may require a wider right-of-way, it creates fewer vertical planes, thereby reducing potential migratory bird impacts. If DNR Option 2B is selected, this wider route would require far less tree removal than other alternatives because the type of NPCs within the corridor have fewer trees. While the Western Option B crosses similar plant communities, the additional mile of corridor along the Mississippi River bluff will require far more extensive tree removal.

Calcareous Fen

Calcareous fens are protected by Minnesota Statutes, section 103G.223, which states that calcareous fens may not be impacted or altered. We advise the proposer to coordinate with DNR regarding the proposed new pole structures that will be located in close proximity to the new St. Martin 15 calcareous fen.

Our agency recommends that a special condition be added to the route permit requiring coordination and a no effect concurrence from the DNR regarding the St. Martin 15 calcareous fen. To ensure that the St. Martin 15 calcareous fen is not impacted or altered, the proposer will need to obtain a *no effect concurrence decision* from the DNR prior to construction. To obtain a no effect concurrence decision, the proposer will need to demonstrate that any temporary or permanent disturbance from any project-related activities, including dewatering, are avoided. To make a determination regarding potential fen impacts, DNR staff will need a project plan describing construction, depth and area of excavation or installation of infrastructure, transport, or changes to hydrology or water quality. If impacts to the fen cannot be avoided, a Calcareous Fen Management Plan (CFMP) would need to be approved by the Commissioner of the DNR. Please note that the CFMP development is completed by the applicant and can take a significant amount of time and resources. Please coordinate regarding calcareous fen impacts with DNR calcareous fen program coordinator, Keylor Andrews (651-259-5259; keylor.andrews@state.mn.us).

State-listed Species

Once a final route is selected, the proposer should coordinate further with DNR on requirements for protected state-listed species. Please see the Natural Heritage Review letter (MCE#2023-00630) in Appendix G of the EA. A rare plant survey is required for the state-endangered Butternut (*Juglans cinerea*). An avoidance plan is required for the state-threatened Blanding's turtle (*Emydoidea blandingii*). The DNR recommends that the route permit include special conditions related to the butternut survey and the Blanding's turtle avoidance plan to ensure completion of these two matters.

Dust Control

Products containing calcium chloride or magnesium chloride 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. To ensure that chloride products are not used for dust control, the DNR recommends a special permit condition like the one included for the Regal Solar site permit (Docket GS-19-395): *The Permittee shall utilize non-chloride products for dust control activities.*

Wildlife-Friendly Erosion Control

Synthetic erosion control materials can cause entanglement issues for the state-threatened Blanding's turtle and other small animals, and hydro-mulch products may contain small synthetic (plastic) fibers to aid in matrix strength. These loose fibers could potentially re-suspend and make their way into waterways. Therefore, the DNR recommends a special permit condition requiring the use of wildlife friendly erosion control akin to the special permit condition for the rebuild of the 69 kV transmission line in Stearns County (Docket TL-22-235): *The Permittee shall use only "bio-netting" or "natural netting" types and mulch products without synthetic (plastic) fiber additives.*

The DNR appreciates the opportunity to comment on the Alexandria to Big Oaks 345-kV Transmission Project. If you have questions about our agency's comments, I may be reached at 651-259-5122 or becky.horton@state.mn.us.

Sincerely,

/s/ Becky Horton

EC: Scott Ek, Minnesota Public Utilities Commission
 Melissa Collins, Minnesota Department of Natural Resources
 Lisa Joyal, Minnesota Department of Natural Resources
 Keylor Andrews, Minnesota Department of Natural Resources
 Matt Langan, Xcel Energy

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