



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

July 30, 2024

Rich Davis
Minnesota Department of Commerce
85 7th Place East, Suite 280
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 - TL-23-157

Dear Rich Davis,

The Minnesota Department of Natural Resources (DNR) has reviewed the application for a Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota. Our agency offers the following comments regarding potential environmental impacts, as well as river crossing options, that should be considered in the environmental assessment (EA).

Calcareous Fen

Many calcareous fens (Holden 1 West (13336), Wanamingo 22 (29025), Kasota 7 (34551), McCarthy Lake (31975), Haverhill 19 (31983), and Lime 30 (38219)) have been documented within five miles of the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act (WCA), authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away. For more information regarding calcareous fens, please see the [Calcareous Fen Fact Sheet](#). To minimize stormwater impacts, please refer to the Minnesota Pollution Control Agency's [General Principles for Erosion Prevention and Sediment Control](#) in the Minnesota Stormwater Manual. Please note that calcareous fens are "Special Waters" and a [buffer zone](#) may be required. Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g., groundwater pumping, contamination, discharge, or excavation). To ensure compliance under WCA, please contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).

Route 3 proposes to use existing right-of-way and pole structures. It will be important to fully understand the temporary impacts that could occur as a result of this project in the McCarthy Lake Wildlife Management Area and Calcareous Fen. The EIS should fully describe the BMPs that will be used, the timing of the work, the equipment and materials, and any temporary staging areas and work spaces in or near the McCarthy WMA. If any existing pole structures are found to be in need of repair or replacement, the EIS should describe what process will be used to ensure that the fen is not impacted. Please be aware that in areas where new pole structures are proposed in close proximity to a calcareous fen, DNR dewatering permits could require longer review periods to ensure that the fen is not impacted.

Karst

Much of the proposed route options in Olmsted County are in close or direct proximity to mapped karst features. The EIS should address how the project will account for karst geology in pole structure design and placement, and what measures will be taken in the event that karst features are encountered during construction.

Natural Heritage Review

Any additional route alternatives considered in the upcoming EIS, including Option 4 West A, should be submitted to DNR Natural Heritage (NH) staff in order to update the January 23, 2024, NH Review letter. Please coordinate with NH Review staff using the Review.NHIS@state.mn.us email address and put MCE# 2023-00832 in the subject line.

The DNR appreciates the opportunity to comment on the Mankato – Mississippi River 345 kV Transmission Line Project. If you have questions about our agency's comments, I may be reached at becky.horton@state.mn.us.

Sincerely,

/s/ Becky Horton

DNR Project Manager

EC: Melissa Collins, Minnesota Department of Natural Resources
 Haley Byron, Minnesota Department of Natural Resources
 Lisa Joyal, Minnesota Department of Natural Resources