

Appendix G

Agency Correspondence

Federal Agencies



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793



In Reply Refer To:

11/01/2024 19:06:11 UTC

Project Code: 2025-0004694

Project Name: Plum Creek Wind Farm_SPAR

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please 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 and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of “no effect” or “may affect, not likely to adversely affect.” In each case, the Service has compiled and analyzed the best available information on the species’ biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a “Not Likely to Adversely Affect” (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a “May Affect” determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for “May Affect” determinations unless otherwise indicated in your output letter.

Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review. If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected. For bat activity dates, please review Appendix L in the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#).

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC

species list report for your records.

If any of the above activities are proposed, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the northern long-eared bat and tricolored bat range-wide D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. **Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.**

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd East

Bloomington, MN 55425-1659

(952) 858-0793

PROJECT SUMMARY

Project Code: 2025-0004694

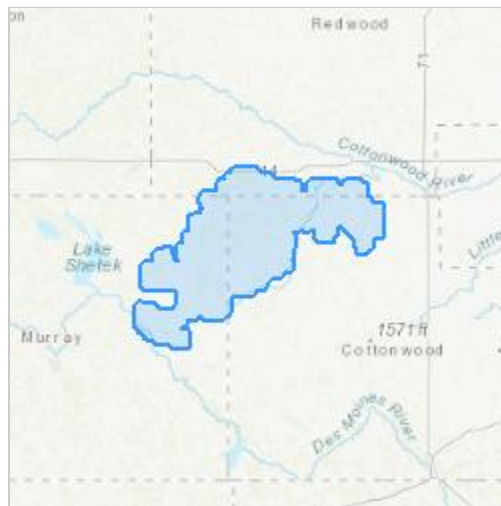
Project Name: Plum Creek Wind Farm_SPAR

Project Type: Power Gen - Wind

Project Description: Plum Creek Wind Farm, LLC (Plum Creek or Applicant), a wholly owned subsidiary of National Grid Renewables Development, is requesting a site permit amendment to allow use of one of four new turbine models: GE 3.8-154; GE 6.1-158; Vestas V150-4.5; and Vestas V163-4.5, corresponding to between 68 and 77 wind turbine locations upon construction of the Project and an additional 1-year extension of the date by which construction of the Project must commence. Plum Creek also requests an extension of the in-service date to December 31, 2028 to allow adequate time for construction activities to be completed.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@44.119819750000005,-95.44988946503005,14z>



Counties: Cottonwood , Murray , and Redwood counties, Minnesota

ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [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.

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate
Western Regal Fritillary <i>Argynnis idalia occidentalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

FLOWERING PLANTS

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

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

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.

The following FWS National Wildlife Refuge Lands and Fish Hatcheries lie fully or partially within your project area:

FACILITY NAME	ACRES
NORTHERN TALLGRASS PRAIRIE NATIONAL WILDLIFE REFUGE https://www.fws.gov/our-facilities? keywords=%5C%22NORTHERN+TALLGRASS+PRAIRIE+NATIONAL+WILDLIFE+REFUGE%5C%22"	868.202

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the ["Supplemental Information on Migratory Birds and Eagles"](#).

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#)

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

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> 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	Breeds Dec 1 to Aug 31

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 ["Supplemental Information on Migratory Birds and Eagles"](#), specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

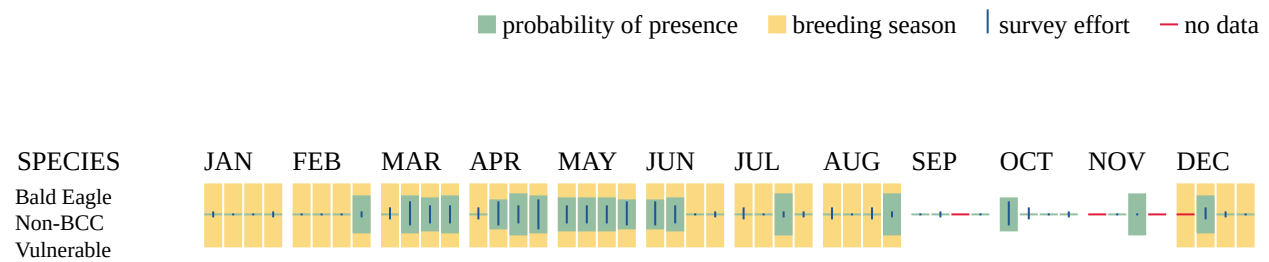
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

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



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

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 habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

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

NAME	BREEDING SEASON
American Golden-plover <i>Pluvialis dominica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere
Bald Eagle <i>Haliaeetus leucocephalus</i> 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	Breeds Dec 1 to Aug 31
Black Tern <i>Chlidonias niger surinamenis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Franklin's Gull <i>Leucophaeus pipixcan</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10567	Breeds May 1 to Jul 31
Grasshopper Sparrow <i>Ammodramus savannarum perpallidus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Henslow's Sparrow <i>Centronyx henslowii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere

NAME	BREEDING SEASON
Northern Harrier <i>Circus hudsonius</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350	Breeds Apr 1 to Sep 15
Pectoral Sandpiper <i>Calidris melanotos</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10669	Breeds Apr 20 to Aug 5

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 "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

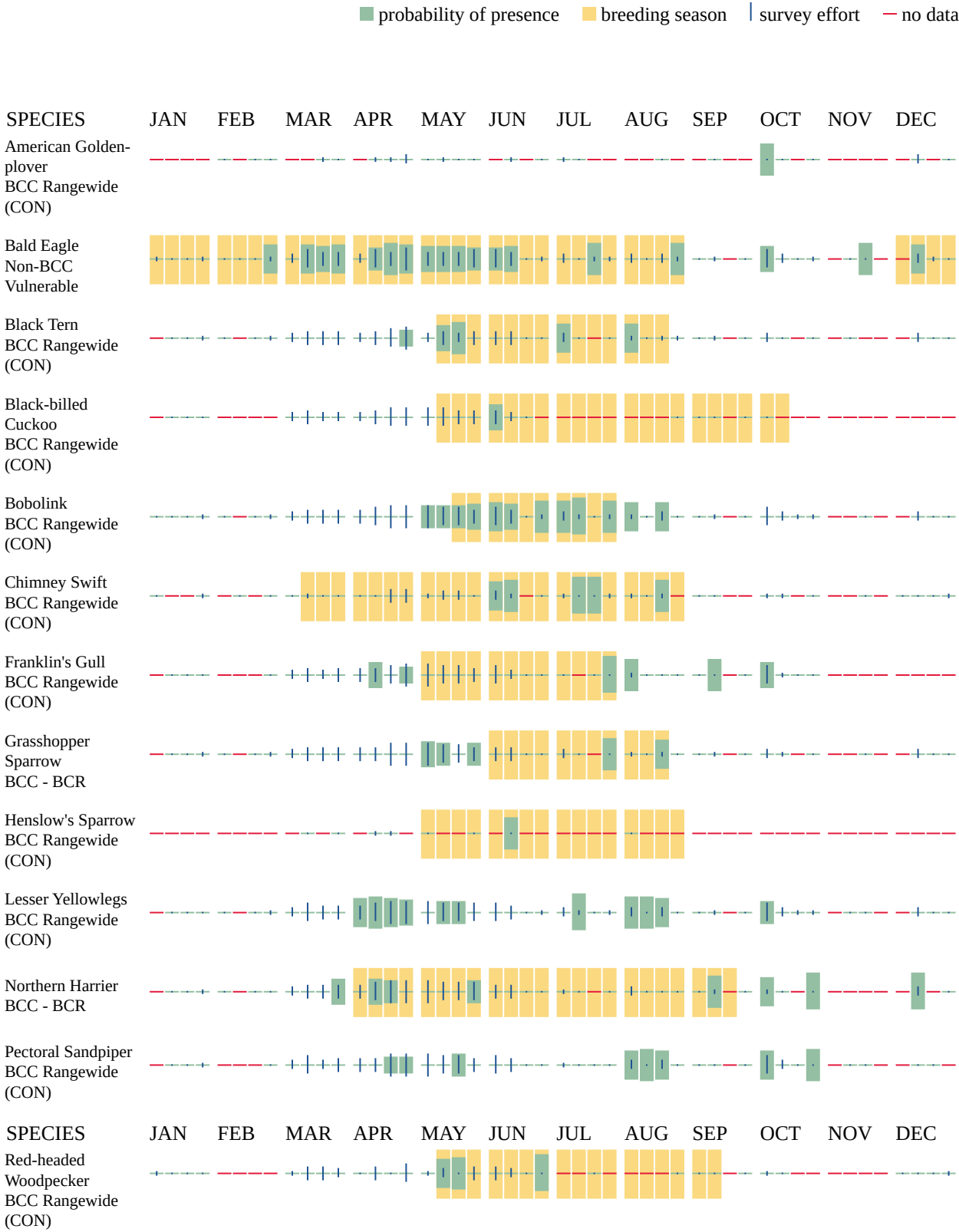
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

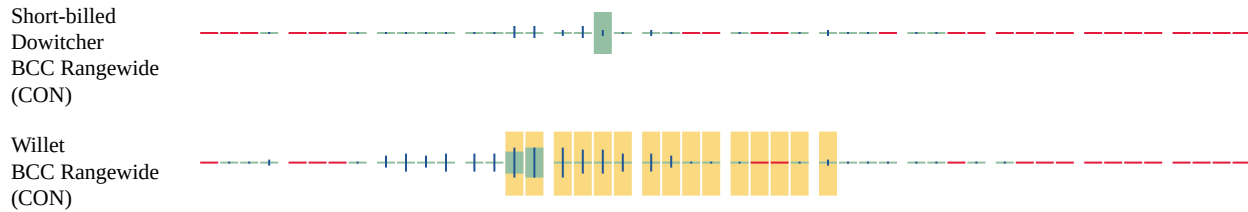
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

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





Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

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.

Due to your project's size, the list below may be incomplete, or the acreages reported may be inaccurate. For a full list, please contact the local U.S. Fish and Wildlife office or visit <https://www.fws.gov/wetlands/data/mapper.HTML>

FRESHWATER EMERGENT WETLAND

- PEM1Ax
- PEM1C
- PEM1Bd
- PEM1Ah
- PEM1Af
- PEM1F
- PEM1Cx
- PEM1B

- PEM1Fh
- PEM1Cd
- PEM1Ch
- PEM1A
- PEM1Fx

FRESHWATER FORESTED/SHRUB WETLAND

- PFO1A
- PFO1B
- PFO1C
- PFO1/EM1A
- PFO1Ax
- PFO1Cx

FRESHWATER POND

- PABF
- PABHh
- PABFh
- PABH
- PABFx

LAKE

- L2ABH
- L2UBHh
- L2UBH

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Andrea Townsend
Address: 1 SE Main St
Address Line 2: Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email: andrea.sampson@merjent.com
Phone: 6122261331

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers

State Agencies



Formal Natural Heritage Review - Cover Page

See next page for results of review. A draft watermark means the project details have not been finalized and the results are not official.

Project Name: Plum Creek Wind Farm

Project Proposer: Plum Creek Wind Farm, LLC

Project Type: Power, Wind

Project Type Activities: Waterbody or watercourse impacts (e.g., dewatering, discharge, excavation, fill, runoff, sedimentation, changes in hydrology); Wetland impacts (e.g., dewatering, tiling, drainage, discharge, excavation, fill, runoff, sedimentation, changes in hydrology)

TRS: T106 R39 S4, T106 R39 S5, T106 R39 S6, T106 R40 S1, T107 R38 S10, T107 R38 S19, T107 R38 S2, T107 R38 S3, T107 R38 S4, T107 R38 S5, T107 R38 S6, T107 R38 S7 +

County(s): Cottonwood, Murray, Redwood

DNR Admin Region(s): South

Reason Requested: PUC Site or Route Application, Local Government Permit, DNR Permit or License

Project Description: Plum Creek Wind Farm, LLC (Plum Creek or Applicant), a wholly owned subsidiary of National Grid Renewables Development, LLC (NG Renewables), intends to ...

Existing Land Uses: The majority of land use in the Project Area is cultivated crop land (approximately 66,654 acres or 91.2 percent). Pasture/hay lands comprise approximately ...

Landcover / Habitat Impacted: As noted above, the project is located primarily in cultivated crop land. Forested areas are primarily surrounding residences as windbreaks and riparian ...

Waterbodies Affected: Waterbodies - The Project will have minor, mostly short-term effects on surface water resources. Project facilities have been designed to avoid impacts ...

Groundwater Resources Affected: Plum Creek does not anticipate any impacts to bedrock during construction or operation of the Project as bedrock within the Project Area is at depths greater ...

Previous Natural Heritage Review: Yes, ERDB#: 20170252

Previous Habitat Assessments / Surveys: No

SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	Needs Further Review	Needs Further Review
Ecologically Significant Area	Comments	MBS Sites - Recommendations Local Conservation Value - Comment Potential RNC - Will Require Consultation Protected Wetlands: Calcareous Fens

Category	Results	Response By Category
State-Listed Endangered or Threatened Species	Needs Further Review	State-protected Species in Vicinity
State-Listed Species of Special Concern	Comments	Recommendations
Federally Listed Species	Comments	Visit IPaC for Federal Review



May 29, 2024

Project Name: Plum Creek Wind Farm
Project Proposer: Plum Creek Wind Farm, LLC
Project Type: Power, Wind
Project ID: MCE #2024-00281

AUTOMATED RESULTS: FURTHER REVIEW IS NEEDED

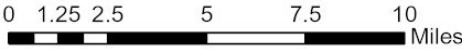
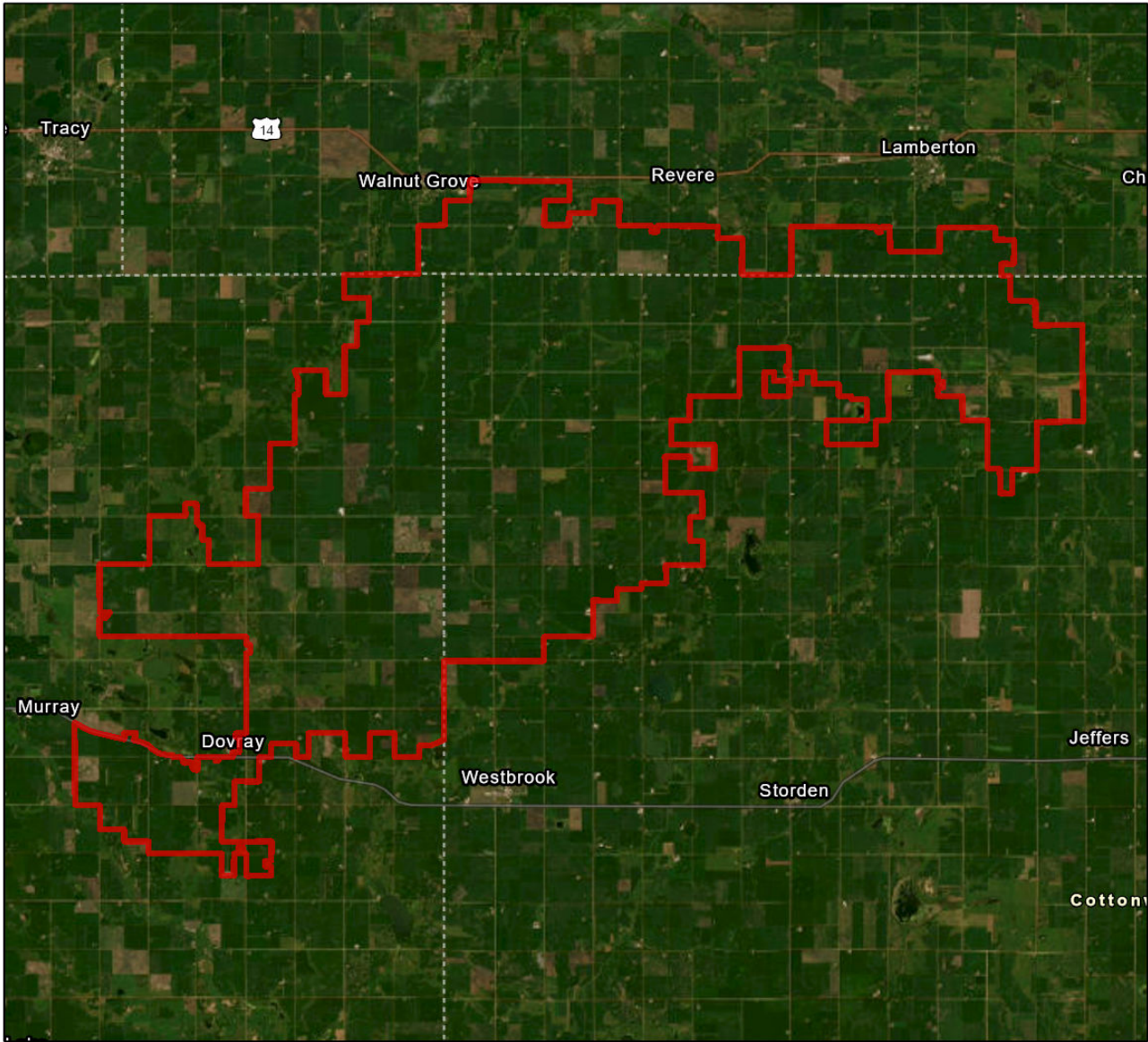
As requested, the above project has undergone an automated review for potential impacts to rare features. Based on this review, one or more rare features may be impacted by the proposed project and further review by the Natural Heritage Review Team is needed. You will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

Please refer to the table on the cover page of this report for a summary of potential impacts to rare features. For additional information or planning purposes, use the Explore Page in Minnesota Conservation Explorer to view the potentially impacted rare features or to create a Conservation Planning Report for the proposed project.

If you have additional information to help resolve the potential impacts listed in the summary results, please attach related project documentation in the Edit Details tab of the Project page. Relevant information includes, but is not limited to, additional project details, completed habitat assessments, or survey results. This additional information will be considered during the project review.

Plum Creek Wind Farm

Aerial Imagery With Locator Map



 Project_Boundary

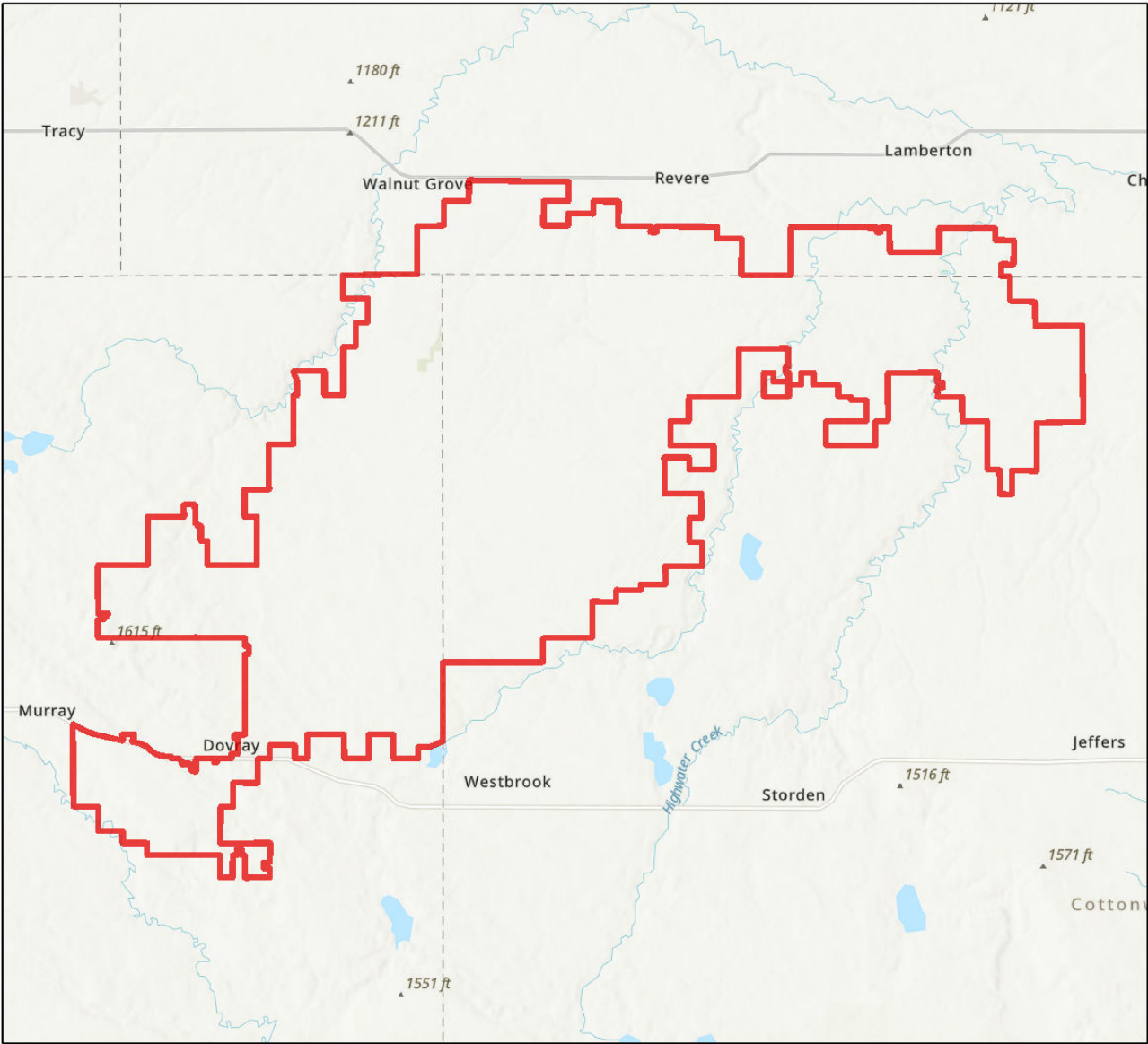
Project Type: Power, Wind
Project Size (acres): 72,969.28
County(s): Cottonwood, Murray, Redwood
TRS: T106 R39 S4, T106 R39 S5, T106 R39 S6, T106 R40 S1, T107 R38 S10 +

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Earthstar Geographics
Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA,



Plum Creek Wind Farm

USA Topo Basemap With Locator Map



 Project_Boundary

Project Type: Power, Wind

Project Size (acres): 72,969.28

County(s): Cottonwood, Murray, Redwood

TRS: T106 R39 S4, T106 R39 S5, T106 R39 S6, T106 R40 S1, T107 R38 S10 +

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Esri, NASA, NGA, USGS
Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA,





Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

July 1, 2024

Angela Durand
Merjent, Inc.

RE: Natural Heritage Review of the proposed Plum Creek Wind Farm,
Cottonwood, Murray, and Redwood County

Dear Angela Durand,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2024-00281** in the email subject line.

As requested, the [Minnesota Natural Heritage Information System](#) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. Based on the project details provided with the request, the following rare features may be impacted by the proposed project:

Ecologically Significant Areas

- The Minnesota Biological Survey (MBS) has identified multiple Sites of Biodiversity Significance and DNR Native Plant Communities (NPCs) within the project boundary (see the Conservation Project Report available in Minnesota Conservation Explorer for a list). There are 19 *Moderate* ranked Sites of Biodiversity Significance. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Sites ranked as *Moderate* contain occurrences of rare species and/or moderately disturbed native plant communities, and/or landscapes that have a strong potential for recovery. There are also 15 areas ranked as *Below* within the project boundary that the MBS considered for Sites of Biodiversity Significance but were determined to be below the minimum biodiversity threshold for statewide significance. These areas, however, have conservation value at the local level as habitat for native plants and animals, corridors for animal movements, buffers surrounding higher quality natural areas, or as areas with high potential for restoration of native habitat.

All of the NPCs within the project boundary are considered rare in Minnesota (i.e., they have a Conservation Status Rank of S1 through S3). Many of these NPCs are native prairie. More than 99% of the prairie that was present in the state before settlement has been destroyed, and more than one-third of Minnesota's endangered, threatened, and special concern species are now dependent on the remaining small fragments of Minnesota's prairie ecosystem. Therefore, we feel that all prairie remnants merit protection. We encourage you to consider project alternatives that would avoid or minimize disturbance to these ecologically significant areas. The proposed project includes land identified as *Prairie Corridor*

and *Corridor Complex* in the [Minnesota Prairie Conservation Plan](#), a twenty-five year strategy for accelerating prairie conservation in the state. To meet the Plan's goals, areas within *Prairie Corridor Areas* will need to include restoration. As such, any efforts toward [prairie or grassland restoration](#) after project construction are encouraged.

Given the ecological significance of these areas, the DNR recommends that MBS Sites ranked Moderate be considered avoidance areas within the permitting boundary. As mentioned above, less than one percent of prairie habitat remains in Minnesota. Many grassland bird species that depend on these remaining prairies are declining in number nationwide. Any cumulative impact assessment should address the issue of avian mortality. Indirect impacts from surface runoff or the spread of invasive species should be minimized during project construction and operation.

MBS Sites of Biodiversity Significance and DNR Native Plant Communities can be viewed using the [Minnesota Conservation Explorer](#) or their GIS shapefiles can be downloaded from the [MN Geospatial Commons](#). Please contact the [NH Review Team](#) if you need assistance accessing the data. Reference the [MBS Site Biodiversity Significance](#) and [Native Plant Community](#) websites for information on interpreting the data.

- If the Wetland Conservation Act (WCA) is applicable to this project, please note that wetlands within *High* or *Outstanding* MBS Sites of Biodiversity Significance may qualify as “rare natural communities” under this Act. Minnesota Rules, part 8420.0515, subpart 3 states that a wetland replacement plan for activities that modify a rare natural community must be denied if the local government unit determines the proposed activities will permanently adversely affect the natural community.
- A calcareous fen (Storden 21, ID 33992) was documented near the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act, 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](#). Wind turbines and associated infrastructure need to completely avoid calcareous fens and not alter the hydrological conditions in the surrounding area. If this is not possible and it is determined the proposed project will impact a calcareous fen in any way, you will need to consult with the Wetlands Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).

State-listed Species

- Wilson's phalarope (*Phalaropus tricolor*), a state-listed threatened bird, has been documented during the breeding season in the vicinity of the proposed project. This wetland species nests on the ground in wet meadows, grassy marshes, and along edges of shallow inland waters. Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit. Given the presence of this state-protected bird, **disturbance to suitable nesting habitat must be avoided between mid-May and July, the breeding season for Wilson's phalaropes.**

Please contact Review.NHIS@state.mn.us to confirm that the above avoidance measure will be implemented or to inform us that avoidance is not feasible. If avoidance is not feasible, the project area will need to be surveyed for active nests prior to any project disturbance. Requirements for surveys and lists of DNR certified lists of surveyors can be found at the [Natural Heritage Review website](#).

- Trumpeter swans (*Cygnus buccinator*), a state-listed species of special concern, have been documented nesting in the vicinity of the proposed project. During the breeding season, trumpeter swans select small ponds and lakes with extensive beds of cattails, bulrush, sedges, and/or horsetail. Ideal habitat includes about 100 m of open water for take-off, stable levels of unpolluted water, emergent vegetation, low levels of human disturbance, and the presence of muskrat (*Ondatra zibethicus*) houses and American beaver (*Castor canadensis*) lodges for use as nesting platforms. If any of the wetlands on site provide suitable habitat, swans may choose to nest in these wetlands. **The DNR recommends avoiding construction activities during the nesting season, late April through early June, near suitable nesting habitat.**
- Great Plains toad (*Anaxyrus cognatus*), a state-listed species of special concern, was documented in the vicinity of the proposed project. This species is found in remnant prairies and grasslands in Western Minnesota. They breed from May to July in highly ephemeral water-filled prairie depressions and have adapted to breed in flooded agricultural fields. **Given the presence of these rare toads, the DNR recommends that the use of erosion control mesh, if any, be limited to [wildlife-friendly materials](#).**
- The nearby Waterfowl Production Areas and Wildlife Management Areas lands attract many other species of birds during the breeding season and during migration. **It should be noted that the NHIS does not include records of migrating birds.**

Wind farms can affect birds due to construction disturbance during the breeding season, loss or degradation of habitat, and collisions with turbines or overhead transmission lines. Actions to minimize impacts to state-listed birds may include, but are not limited to, the following recommendations:

- Site turbines away from wetlands, waterbodies, and grasslands.
- Avoid siting turbines within potential flight paths between suitable habitat.
- Avoid construction activities within suitable habitat.
- Use the results of the post-construction fatality monitoring to inform adaptive management.

The DNR looks forward to receiving the results of any avian surveys and may have additional comments regarding state-listed birds at that time.

- Please visit the [DNR Rare Species Guide](#) for more information on the habitat use of these species and recommended measures to avoid or minimize impacts.

Federally Protected Species

- To ensure compliance with federal law, conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

Environmental Review and Permitting

- Incorporate the relevant guidance, including setbacks, within the [DNR's Guidance for Commercial Wind Energy Projects](#) when determining infrastructure location and throughout the operation of this proposed project.
- Please include a copy of this letter and the MCE-generated Final Project Report in any state or local license or permit application. Please note that measures to avoid or minimize disturbance to the above rare features may be included as restrictions or conditions in any required permits or licenses.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. However, the NHIS is not an exhaustive inventory and thus does not represent all of the occurrences of rare features within the state. Therefore, ecologically significant features for which we have no records may exist within the project area. If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location and project description provided with the request. If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating project activities.

The Natural Heritage Review does not constitute project approval by the Department of Natural Resources. Instead, it identifies issues regarding known occurrences of rare features and potential impacts to these rare features. Visit the [Natural Heritage Review website](#) for additional information regarding this process, survey guidance, and other related information. For information on the environmental review process or other natural resource concerns, you may contact your [DNR Regional Environmental Assessment Ecologist](#).

Thank you for consulting us on this matter and for your interest in preserving Minnesota's rare natural resources.

Sincerely,

James Drake

Natural Heritage Review Specialist
James.F.Drake@state.mn.us

Cc: Haley Byron, Megan Benage, Jennie Skancke, Keylor Andrews

From: [Marta Lasch](#)
To: [Haley Byron](#); [Martin.Donovan](#); [Duehr, Jeremy](#); [Monika Davis](#); [Bump, Samantha \(DNR\)](#)
Cc: [Sophia Gilleland](#)
Subject: EXTERNAL: RE: [External] RE: Plum Creek Wind - HVTL
Date: Tuesday, January 14, 2025 3:26:27 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)

CAUTION: This email originated from outside of Merjent.

Hi Haley,

Appreciate that quick response and these recommendations. I will review the recommendations with the project team and circle back with questions.

Thanks,
Marta



Marta Lasch
Permitting Lead
P 612.259.3093

952.988.9000



From: Byron, Haley (DNR) <Haley.Byron@state.mn.us>
Sent: Tuesday, January 14, 2025 3:16 PM
To: Marta Lasch <mlasch@nationalgridrenewables.com>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Duehr, Jeremy <JDuehr@fredlaw.com>; Monika Hagebak Davis <monika.davis@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>
Cc: Sophia Gilleland <sgilleland@nationalgridrenewables.com>
Subject: RE: [External] RE: Plum Creek Wind - HVTL

Hello Marta,

Thank you for checking in. This area contains native dry hill prairie. Unfortunately, no plant survey is available for the area. For the proposed alignment, vegetation management within the right-of-way is more of a concern than structure placement. For all native plant communities and sites of biodiversity significance along transmission lines, we strongly recommend the following:

- Surveying all mapped native plant communities for state-listed species
- Limit vegetation clearing.
- Restricting herbicide use to spot treatments.
- DNR review of seed mixes used on or adjacent to the site.

Habitats with state-protected species may require a large buffer distance from herbicide use.

- The cut and scatter method of cutting understory trees, branches, and brush and scattering them across the site should not be used in sensitive habitats like native prairie where the cleared vegetation consists of invasive species. Brush in these communities should be piled, burned, or removed from the site.

Please let me know if you have any questions. Thank you!

Haley Byron

Regional Environmental Assessment Ecologist | Southern Region EWR

Minnesota Department of Natural Resources

117 Rogers Street

Mankato, MN 56001

Office: 507-389-8813

Cell: 507-910-8963

Email: haley.byron@state.mn.us

mndnr.gov



From: Marta Lasch <mlasch@nationalgridrenewables.com>

Sent: Tuesday, January 14, 2025 2:37 PM

To: Byron, Haley (DNR) <Haley.Byron@state.mn.us>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Duehr, Jeremy <JDuehr@fredlaw.com>; Monika Hagebak Davis <monika.davis@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>

Cc: Sophia Gilleland <sgilleland@nationalgridrenewables.com>

Subject: RE: [External] RE: Plum Creek Wind - HVTL

Some people who received this message don't often get email from mlasch@nationalgridrenewables.com. [Learn why this is important](#)

Hi Martin, Samantha and Haley,

Following up to see if you've been able to review the preliminary alignment of the proposed preferred route segment.

If there is any information you can provide about the native plant community in the vicinity of this route, we would utilize that in the development and planning of the project.

Thank you,

Marta



Marta Lasch
Permitting Lead

P 612.259.3093

952.988.9000



From: Marta Lasch <mlasch@nationalgridrenewables.com>
Sent: Wednesday, December 11, 2024 10:18 AM
To: Byron, Haley (DNR) <Haley.Byron@state.mn.us>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Duehr, Jeremy <JDuehr@fredlaw.com>; Monika Hagebak Davis <monika.davis@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>
Cc: Sophia Gilleland <sgilleland@nationalgridrenewables.com>
Subject: RE: [External] RE: Plum Creek Wind - HVTL

Hello folks,

Apologies for the delay in providing the Optimized Route Segment for your review. Attached is a kmz showing the transmission line and preliminary pole placement. Please note we've placed a pole near but outside of the native plant community and site of biodiversity significance that were discussed.

I also wanted to follow up to see if details of the native plant community could be shared.

Please let us know if you have additional questions about the proposed Optimized Route Segment.

Thank you,
Marta



Marta Lasch
Permitting Lead
P 612.259.3093

952.988.9000



From: Byron, Haley (DNR) <Haley.Byron@state.mn.us>
Sent: Monday, October 28, 2024 2:45 PM
To: Marta Lasch <marta@nationalgridrenewables.com>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Duehr, Jeremy <JDuehr@fredlaw.com>; Monika Hagebak Davis <monika.davis@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>
Cc: Sophia Gilleland <sgilleland@nationalgridrenewables.com>
Subject: [External] RE: Plum Creek Wind - HVTL

Hi Marta,

I've reached out to our Regional Ecologists and will let you know what I hear back. Thank you!

Haley Byron

Regional Environmental Assessment Ecologist | Southern Region EWR

Minnesota Department of Natural Resources

117 Rogers Street
Mankato, MN 56001
Office: 507-389-8813

Cell: 507-910-8963
Email: haley.byron@state.mn.us
mndnr.gov



From: Marta Lasch <marta@nationalgridrenewables.com>
Sent: Friday, October 25, 2024 12:46 PM
To: Byron, Haley (DNR) <Haley.Byron@state.mn.us>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Duehr, Jeremy <JDuehr@fredlaw.com>; Monika Hagebak Davis <monika.davis@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>
Cc: Sophia Gilleland <sgilleland@nationalgridrenewables.com>
Subject: RE: Plum Creek Wind - HVTL

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello Haley, Martin and Samantha,

Thank you for your time Monday. We appreciate the opportunity to talk through the proposed amendment. Notes from our meeting are attached.

We are working with the engineers to adjust the alignment to reflect the span we discussed over the NPC. I will circulate those shapefiles when available. In the meantime, can the DNR share the details of the plant communities in the NPC?

Thank you and as always please reach out with any questions.
Marta



952.988.9000



Marta Lasch

Permitting Lead

P 612.259.3093

E marta@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

-----Original Appointment-----

From: Marta Lasch
Sent: Monday, October 14, 2024 1:57 PM
To: Marta Lasch; Byron, Haley (DNR); Donovan, Martin (DNR); Duehr, Jeremy; Monika Hagebak Davis
Cc: Sophia Gilleland
Subject: Plum Creek Wind - HVTL
When: Monday, October 21, 2024 2:00 PM-2:30 PM (UTC-06:00) Central Time (US & Canada).
Where: Microsoft Teams Meeting

[Org help](#)
