

Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40__



February 5, 2014

Burl Haar, Executive Secretary, Minnesota
Public Utilities Commission,
121 7th Place East, Suite 350
St. Paul MN 55101-2147

Re: In the Matter of the Application of Minnesota Power for a Pipeline Routing Permit for the Laskin Energy Center Natural Gas Pipeline Project in Hoyt Lakes
Public Utilities Commission (PUC) Docket Number: E015/GP-13-978

Dear Dr. Haar:

The Minnesota Department of Natural Resources has reviewed the Application for a Pipeline Routing Permit for the Laskin Energy Center Natural Gas Pipeline Project in Hoyt Lakes, Minnesota. The following comments are provided for your consideration.

The application discusses restoration of the pipeline Right-of-Way. The DNR recommends using native vegetation seeding wherever possible, in consultation with land owners. Please see the following webpage for information regarding seed mixes appropriate for various Minnesota regions.

http://www.bwsr.state.mn.us/native_vegetation/

The application discusses management of noxious weeds. The DNR appreciates attention to reducing the introduction and spread of invasive species. Project plans should include construction methods that reduce the introduction of invasive species. Resources are available for planning invasive species Best Management Practices at the following webpages:

<http://www.dnr.state.mn.us/invasives/locations.html>

<http://www.dnr.state.mn.us/invasives/dnrlands.html>

There is also a "Field Worker" section on the following webpage:

<http://www.playcleango.org/takeaction.html>

The following webpage includes applicable Best Management Practices for Transmission and Utility Corridors in Wisconsin and is helpful for Minnesota:

<http://council.wisconsinforestry.org/invasives/transportation/>

The following webpage is an additional reference:

<http://www.mda.state.mn.us/plants/badplants/noxiouslist.aspx>



The application discusses the possible presence of the wood turtle. Please consider the following Natural Heritage Information System review response to regarding an inquiry from the project developer: The DNR concurs that the project is not likely to impact the wood turtle (*Clemmys insculpta*), a state-listed threatened species. In the unlikely event that wood turtles are encountered on site, they should be moved by hand to the edge of the nearest river out of harm's way. All contractors working in the area should be made aware of the potential to encounter these rare turtles, and any sightings should be reported to the DNR. As wood turtles are intolerant of water pollution, including siltation, it is important that effective erosion prevention and sediment control practices are implemented and maintained for the duration of the project.

The DNR encourages the use of wildlife-friendly erosion control wherever possible, and particularly in the vicinity of wetlands or rare species habitat. This type of erosion control helps avoid trapping wildlife, as sometimes occurs with plastic mesh erosion control (see enclosed fact sheet).

Thank you for the opportunity to review the Laskin Energy Center Natural Gas Pipeline Project. Please contact me with any questions.

Sincerely,



Jamie Schrenzel
Principal Planner
Environmental Review Unit
(651) 259-5115

Enclosures: 1

C: Tricia DeBleeckere, Minnesota Public Utilities Commission
Larry Hartman, Minnesota Department of Commerce
Jim Atkinson, Minnesota Power

Wildlife Friendly Erosion Control

Wildlife entanglement in, and death from, plastic netting and other man-made plastic materials has been documented in birds (Johnson, 1990; Fuller-Perrine and Tobin, 1993), fish (Johnson, 1990), mammals (Derraik, 2002), and reptiles (Barton and Kinkead, 2005; Kapfer and Paloski, 2011). Yet the use of these materials continues in many cases, without consideration for wildlife impacts. Plastic netting is frequently used for erosion control during construction and landscape projects, and can negatively impact terrestrial and aquatic wildlife populations as well as snag in maintenance machinery resulting in costly repairs and delays. However, wildlife friendly erosion control materials do exist, and are sold by several large erosion control material companies. Below are a few key considerations before starting a project.

Know Your Options

- When erosion control is necessary, select products with biodegradable netting (Natural Fiber, Biodegradable Polyesters, etc.).
- **DO NOT** use products that require UV-light to biodegrade (also called, “photodegradable”). These do not biodegrade properly when shaded by vegetation.
- Use netting with rectangular shaped mesh (not square mesh).
- Use netting with flexible (non-welded) mesh.
- Wildlife friendly erosion netting costs are often similar to conventional plastic netting.

Know the Landscape

- It is especially important to use wildlife friendly erosion control around:
 - Wetlands, rivers, lakes, and other watercourses.
 - Habitat transition zones (Prairie – Woodland Edges, Rocky Outcrop –Woodland Edges, Steep Rocky Slopes, etc.).
 - Areas with threatened or endangered species.
- Use *plastic* erosion mesh wisely, not all areas with disturbed ground necessitate its use. Do not use *plastic* mesh unless it is absolutely necessary. Other erosion control options exist (open weave textile (OWT), rolled erosion control products (RECPs) with woven natural fiber netting).

Protect Wildlife

- Remember to consult with local natural resource authorities (DNR, USFWS, etc.) before starting a project. They can help you identify sensitive areas and rare species.
- Avoid erosion control materials with plastic netting where possible.
- Use only biodegradable materials, preferably those that biodegrade quickest.



Plains Garter Snake (*Thamnophis radix*) stuck in erosion mesh. Southern Minnesota.



Vole (*Microtus* sp.) found dead in erosion mesh. Southern Minnesota.

Literature Referenced

Barton, C. and K. Kinkead. 2005. Do Erosion Control and Snakes Mesh? *Soil and Water Conservation Society* 60:33A-35A.

Derraik, J.G.B. 2002. The Pollution of the Marine Environment by Plastic Debris: a Review. *Marine Pollution Bulletin* 44:842-852.

Fuller-Perrine, L.D., and M.E. Tobin. 1993. A Method for Applying and Removing Bird-Exclusion Netting in Commercial Vineyards. *Wildlife Society Bulletin* 21:47-51.

Johnson, S.W. 1990. Distribution, Abundance, and Source of Entanglement Debris and Other Plastics on Alaskan Beaches, 1982-1988. *Proceedings of the Second International Conference on Marine Debris* 331-348.

Kapfer, J. M., and R. A. Paloski. 2011. On the Threat to Snakes of Mesh Deployed for Erosion Control and Wildlife Exclusion. *Herpetological Conservation and Biology* 6:1-9.

