



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

December 29, 2022

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

RE: In the Matter of the Application of Great River Energy for a Route Permit to Rebuild the Existing 69kV ST-WW Transmission Line to 115kV in Stearns County, PUC Docket Number: ET-2/TL-22-235

Dear Ms. MacAlister,

The Minnesota Department of Natural Resources (DNR) has reviewed Great River Energy's application for a route permit to rebuild the existing 69kV ST-WW transmission Line to 115kV in Stearns County. Our agency offers the following comments regarding the potential environmental impacts that should be considered in the environmental assessment (EA):

Northern Long-eared Bat

Section 7.6.3 Flora and Fauna (Page 7-28), identifies the northern long-eared bat (NLEB) as federally threatened. The EA should acknowledge that this species has been uplisted to federally endangered. Because the project borders a township known to contain NLEB, the DNR recommends further coordination with U.S. Fish and Wildlife Service to understand how this change in status could affect the project. Our agency advises that avoiding tree removal during the active season, approximately April through October, should be considered as a method to avoid potential NLEB impacts.

Important Bird Area

The EA should recognize that the proposed transmission lines are less than a half mile from the Audubon Society's Avon Hills Important Bird Area (IBA). The southern portion of the project area along Ridgewood Road contains wetlands that extend into the IBA and are likely used by the bird species that have been documented within the IBA. Our agency advises that installing swan-type flight diverters along the southern portion of the transmission line in areas that are in/border wetlands near the IBA should be considered as a method to minimize avian injuries and fatalities.

The DNR appreciates the opportunity to comment on the rebuild of the existing 69kV ST-WW transmission line. If you have questions about our agency's comments, I may be reached at 651-259-5078 or cynthia.warzecha@state.mn.us.

Sincerely,

/s/ Cynthia Warzecha

Energy Projects Planner

CC: Scott Ek, Minnesota Public Utilities Commission
Mark Strohfus, Great River Energy
Melissa Collins, Minnesota Department of Natural Resources
MCE #: 2022-00287

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