



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

December 31, 2024

Mandy Bohnenblust  
Merjent, Inc.

RE: Natural Heritage Review of the proposed North Star BESS Project,  
T34N R21W Section 1, T35N R21W Sections 35-36; Chisago County

Dear Mandy Bohnenblust,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2024-00911** 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:

*State-listed Species*

- Blanding's turtles (*Emydoidea blandingii*), a state-listed threatened species, have been documented in the vicinity of the proposed project. Blanding's turtles use upland areas up to and over a mile distant from wetlands, waterbodies, and watercourses. Uplands are used for nesting, basking, periods of dormancy, and traveling between wetlands. Factors believed to contribute to the decline of this species include collisions with vehicles, wetland drainage and degradation, and the development of upland habitat. Any added mortality can be detrimental to populations of Blanding's turtles, as these turtles have a low reproduction rate that depends upon a high survival rate to maintain population levels.

This project has the potential to impact this rare turtle through direct fatalities and habitat disturbance/destruction due to proposed project activities associated with the project. 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. As such, **the following avoidance measures are required:**

- Avoid wetland and aquatic impacts during hibernation season, between September 15 and April 15, if the area is suitable for hibernation.
- Install and maintain a temporary turtle proof barrier, such as a silt fence, to keep turtles out of soil stockpiles, gravel pads, and other areas of exposed soil/sand/sediment during nesting

- season, May 15 to July 15. The turtle proof barrier must be buried a minimum of 10 inches and removed once project is complete.
- Limit erosion and sediment control to [wildlife friendly erosion control](#).
  - Avoid hydro-mulch products that contain any materials with synthetic (plastic) fiber additives, as the fibers can re-suspend and flow into waterbodies.
  - Check bare ground within construction areas for turtles before the use of heavy equipment or any ground disturbance.
  - The [Blanding's turtle flyer](#) must be given to all contractors working in the area.
  - Report any sightings using the [Quick Species Observation Form](#).
  - If turtles are in imminent danger, move them by hand out of harm's way; otherwise, they are to be left undisturbed. Directions on how to move turtles safely can be found at [Helping Turtles Across the Road](#)

Additional Blanding's turtle avoidance measures may include, but are not limited to, recommendations from List 1 and List 2 of the [Blanding's turtle fact sheet](#).

**Please contact [Review.NHIS@state.mn.us](mailto:Review.NHIS@state.mn.us) to confirm that the above required avoidance measures will be implemented or to inform us that they are not feasible.** If the measures are not feasible, a project-specific avoidance plan will likely be needed.

- Please visit the [DNR Rare Species Guide](#) for more information on the habitat use of this species and further 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*

- 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 native plant communities, rare species, and other rare features. However, the NHIS is not an exhaustive inventory and does not contain the locations of all rare features in 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 [Natural Heritage Review](#) for additional information regarding this process, survey guidance, and other related information. For information on the environmental review process or other natural resource concerns, please 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](mailto:james.f.drake@state.mn.us)

Cc: Melissa Collins