DEPARTMENT OF NATURAL RESOURCES

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

October 14, 2022

Project ID: MCE #2022-00287

Mark Strohfus
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369

RE: Automated Natural Heritage Review of the proposed Proposed ST-WS 115-kV transmission line and substation upgrades
See Cover Page for location and project details.

Dear Mark Strohfus,

As requested, the above project has been reviewed for potential effects to rare features. Based on this review, the following rare features may be adversely affected by the proposed project:

Project Type and/or Project Type Activity Comments

- The Natural Heritage Information System (NHIS) tracks bat roost trees and hibernacula plus some acoustic data, but this information is not exhaustive. Even if there are no bat records listed below, all seven of Minnesota's bats, including the federally threatened northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. Tree removal can negatively impact bats by destroying roosting habitat, especially during the pup rearing season when females are forming maternity roosting colonies and the pups cannot yet fly. To minimize these impacts, the DNR recommends that tree removal be avoided during the months of June and July.

Ecologically Significant Area

- One or more calcareous fens have been documented in the vicinity of the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. 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. Calcareous fens are fragile and may be impacted by stormwater runoff, any activity within the fen, or any activity that affects groundwater hydrology including groundwater pumping, contamination, or discharge). 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.

Depending on the distance to the calcareous fen(s), additional guidance may be provided below if you indicated that potential project activities include wetland impacts or groundwater impacts. If you did not correctly identify wetland or groundwater impacts as part of your project, this impact analysis may be incorrect.

State-Listed Endangered or Threatened Species

No state-listed endangered or threatened species have been documented in the vicinity of the project.

State-Listed Species of Special Concern

Taxonomic Group	Common Name	Scientific Name	Water Regime	Habitat	Federal Status
Invertebrate Animal	Black Sandshell	Ligumia recta		Large Rivers, Medium Rivers and Streams	

- The above table identifies state-listed species of special concern that have been documented in the vicinity of your project. If suitable habitat for any of these species occurs within your project footprint or activity impact area, the project may negatively impact those species. To avoid impacting state-listed species of special concern, the DNR recommends modifying the location of project activities to avoid suitable habitat or modifying the timing of project activities to avoid the presence of the species. 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. For further assistance, please contact the appropriate DNR Regional Nongame Specialist or Regional Ecologist. Species-specific comments, if any, appear below.

Federally Listed Species

The Natural Heritage Information System does not contain any records for federally listed species within one mile of the proposed project. However, to ensure compliance with federal law, please conduct a federal regulatory review using the U.S. Fish and Wildlife Service's online Information for Planning and Consultation (IPaC) tool.

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 the project description provided on the cover page. If project details change or construction has not occurred within one year, please resubmit the project for review.

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 effects to these rare features. 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.

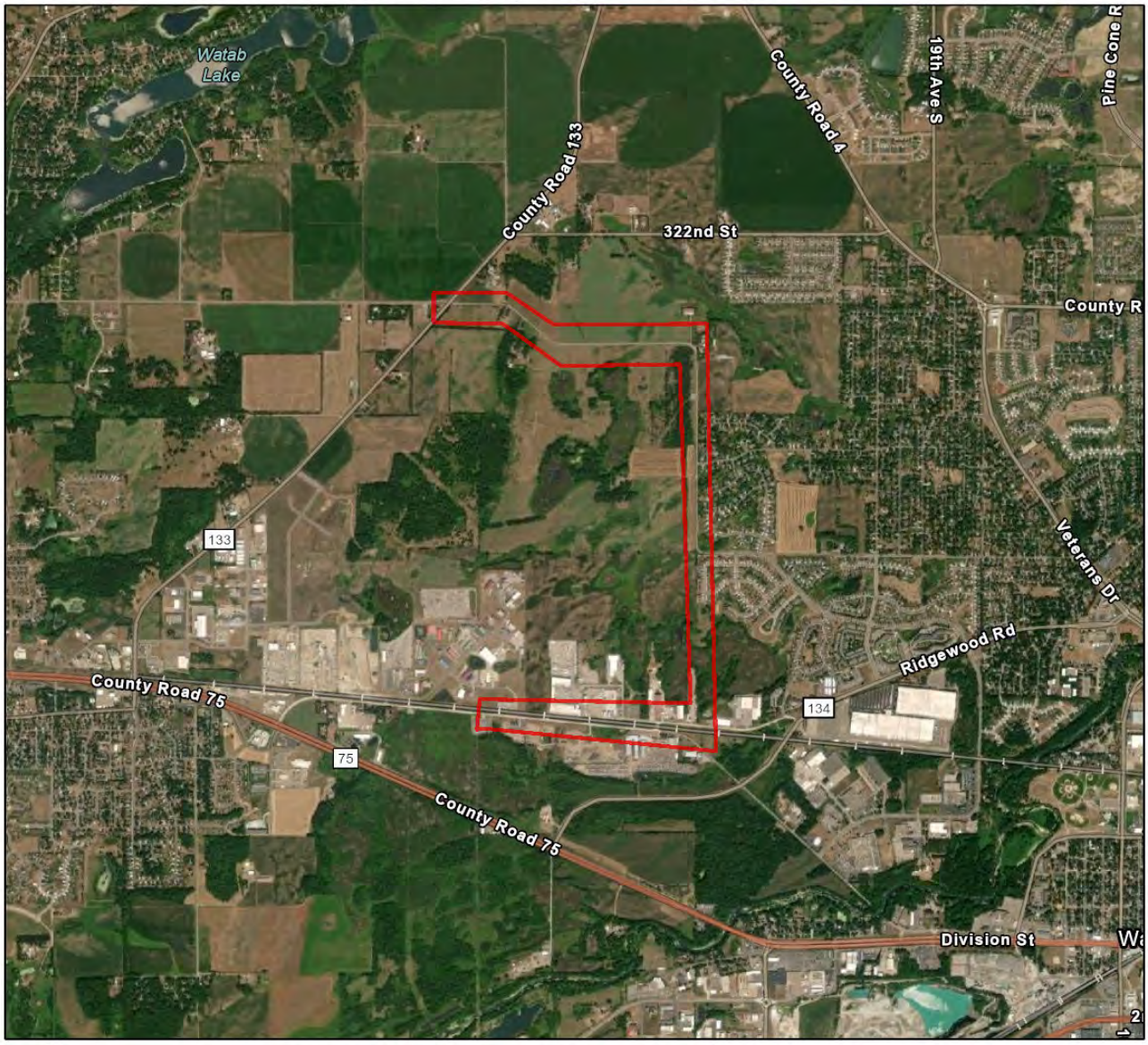
Sincerely,

Samantha Bump
Natural Heritage Review Specialist
Samantha.Bump@state.mn.us

Links: USFWS Information for Planning and Consultation (IPaC) tool
Information for Planning and Consultation (IPaC) tool
DNR Regional Environmental Assessment Ecologist Contact Info
https://www.dnr.state.mn.us/eco/ereview/erp_regioncontacts.html

osed ST-WS 115-kV transmission line and substation upgr

Aerial Imagery With Locator Map



N
W E
S

0 0.23 0.45 0.9 1.35 1.8
Miles

Project Boundary

Project Type: Utilities, Transmission (electric, cable, phone)

Project Size (acres): 224.95

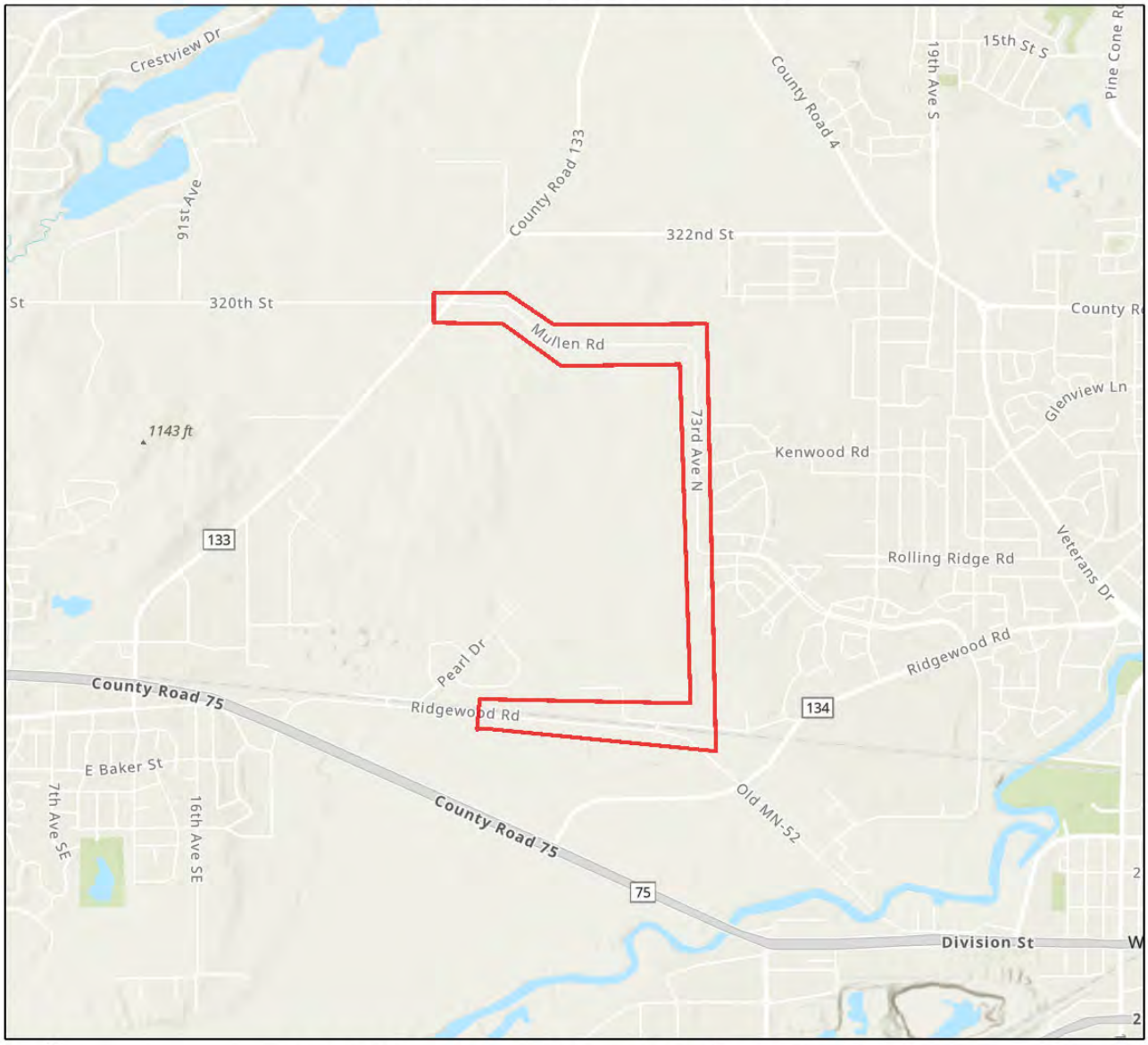
County(s): Stearns

TRS: T124 R28 S6, T124 R28 S7, T124 R29 S1, T124 R29 S12, T125 R29 S36

Earthstar Geographics
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA

osed ST-WS 115-kV transmission line and substation upgr

USA Topo Basemap With Locator Map



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TRS: T124 R28 S6, T124 R28 S7, T124 R29 S1, T124 R29 S12, T125 R29 S36

ATTACHMENT F

Attachment F

From: Strohfus, Mark GRE-MG
Sent: Wednesday, November 2, 2022 2:56 PM
To: MacAlister, Jamie (COMM) <jamie.macalister@state.mn.us>
Subject: RE: Public Meeting Planning - GRE St. Joseph Project 22-235

Jamie,

Thank you for the table. We will work to get you responses as soon as possible.

It's not clear to me what you are looking for on the GHG calculations. I've attached the live spreadsheet version of Table 7-6, pg 7-23 in the application. Please look this over and then let's have a conversation around what else you're looking for.

Thanks Again,
Mark Strohfus
Project Manager, Transmission Permitting
12300 Elm Creek Boulevard
Maple Grove, MN 5536-4718
D: 763-445-5210
C: 612-961-9820
MStrohfus@GREnergy.com

Fuel Type	Estimated Total Fuel Use (gal)	Heating Value (mmBtu/gal)	CO2 Emission Factor (kg/mmBtu)	Total CO2 Emissions (kG)	CH4 Emission Factor (kg/mmBtu)	Total CH4 Emissions (kG)	N2O Emission Factor (kg/mmBtu)	Total CH4 Emissions (kG)
Distillate No. 1	10,800	0.139	73.25	109,963	0.003	4.5	0.0006	0.90
Distillate No. 2	10,800	0.138	73.96	110,230	0.003	4.5	0.0006	0.89
TOTAL (kG)	---	---	---	220,193	---	9.0	---	2
Global Warming Potential	---	---	---	1	---	25	---	298
Grandtotal as CO2e (kG)	---	---	---	220,193	---	224	---	535
Grandtotal as CO2e (tons)	**---**	**---**	**---**	**243**	**---**	**0.25**	**---**	**0.59**

GRE St. Joe 115 kV Transmission Line EA – Data Request 01

Data Request No.	Category	Date Requested	Purpose	Data/Information Request	Response
DR01-1	Environmental Impacts	3/17/23	Evaluation of impacts for expanded route width requested during the scoping comment period.	Please provide a description the expanded route width. This description should include: 1. Size of the expanded route width. 2. Type of vegetation within the expanded route width. 3. Timing of vegetation removal 4. A list of equipment that would be utilized. 5. Method or means disposing of removed vegetation. 6. Impacts resulting from vegetation removal on soil, wildlife, aesthetics, water resources, etc. 7. How will the area be restored and timeline for restoration? 8. Describe the circumstances that would lead GRE to use/not use the expanded route width.	See DR01-1 Responses below.
DR01-02	Cumulative Impacts	3/17/23	The EA will evaluate cumulative impacts associated with the project.	Please provide a comprehensive assessment of other proposed or anticipated projects in the area adjacent to and surrounding the project area as well as timing of any actions. This includes: 1. Potential local or state roadway improvements. 2. Developments within the business park 3. Changes to the bike trail 4. Improvements or construction activities associated with the adjacent railroad. 5. Water/Sewer Line improvements 6. Any other infrastructure projects proposed by the township, city, or county.	See DR01-2 Responses below.
DRO1-3	Maps	3/17/2023	The EA will include a series of maps for the project.	Please provide shapefiles for the existing non-project GRE and non-GRE transmission lines, substations, numbered project route segments, and similar shapefiles that were used to generate the maps in the application. We have the proposed centerline and updated route width, but not the project detail in maps included in the application. Jenna may have additional requests, but this should be a good start. She does not need non-project shapefiles such as zoning, soils, etc. It would be helpful to provide current and future planned City or MNDoT right-of-way shapefiles that are within the project if you have them.	DR01-3 Responses were emailed March 27, 2023. Copy attached.

DR01-1 RESPONSES

1. **Size of expanded route width**. Starting at the northeast corner of the Project at the intersection of 73rd Avenue and Mullen Road, the expanded route width is 450 feet wide west of the City of St. Cloud boundary, extending 1,480 feet south of the Mullen Road centerline. From this point, the route width decreases to 250 feet wide west of the City of St. Cloud boundary, extending 2,650 feet further to the south. From this point south to 304th Street, the route width returns to 100 feet west of the City of St. Cloud boundary, as depicted in the Route Permit Application.
2. **Type of vegetation within the expanded route width** – The following table provides the land use cover within the entire route including the expanded route width, the land use cover within the originally proposed route width, and the net differences between the two. Note that the available land use cover data (https://www.mrlc.gov/data) does not accurately characterize the current land use cover within the specific area of the expanded route area. For this analysis, Great River Energy has characterized the land use cover within the expanded route area consistent with what we have observed during on site reviews and 2021 Google Earth aerial photography.

Existing Land Cover	Acres within Entire Route with Expanded Route	Acres within Original Route	Additional Acres within Expanded Route
Cultivated	15.01	9.34	5.67
Developed	36.3	32.69	3.61
Forested	18.49	2.25	16.24
Pasture/Hay	9.33	9.18	0.15
Wetland	2.92	2.92	0
Total	**82.05**	**56.38**	**25.67**

3. **Timing of vegetation removal** – Vegetation removal within the expanded route width will be consistent with the removal for the rest of the Project ROW. Minimal tree clearing is expected on the Project where the final design follows the existing centerline. If the Project deviates from the existing centerline within the expanded route width due to the Cities' road expansion, additional tree clearing could be necessary. Tree and vegetation removal would be completed in accordance with guidance from USFWS at that time, including in compliance with applicable timing restrictions in place at that time.
4. **A list of equipment that would be utilized** – The same equipment would be used in the expanded route width as on the rest of the Project. Commonly used equipment include a feller buncher to remove larger trees, mowers or mulching heads on an excavator to clear shrubs, skid-steer-mounted grinders to grind trunks to just below grade, a chipper or shredder, and miscellaneous hand tools (chain saw, hand saws, brush cutters) might also be used. Additional discussion of construction procedures that will be used on the Project (including any work within the expanded route width) are included in Section 6.5 of the Application.
5. **Method or means disposing of removed vegetation** – Vegetation removal/disposal within the expanded route width would follow the same procedures as the remainder of the Project. More specifically, larger tree trunks or limbs would be cut to lengths of approximately 10 feet or more. Tree and shrub residuals would be chipped or shredded. If a landowner does not want to keep any or all the trunks, limbs, chips or shreds, an appropriate disposition site (typically a lumber mill, landfill, and/or compost site) will be identified by the contractor once Great River Energy has selected a vendor after permit issuance.
6. **Impacts resulting from vegetation removal on soil, wildlife, aesthetics, water resources, etc.** – Impacts within the expanded route width would be similar as what would occur within the rest of the Project ROW, except where the land cover differs in the expanded route width from what exists in the existing ROW (see DR01-1-2). The primary difference between the expanded route width and the remainder of the Project would be that the expanded route width includes areas which would require additional vegetation clearing and that is currently in row crop production that is not already crossed by an existing utility facility. More specifically, as noted in response DR01-1-2, shifting the ROW into the expanded route width would result in more acreage impacts to crop land and tree cover. The incremental tree clearing within the expanded route could impact visual aesthetics, but this would be mitigated in part due to the remaining woods on the north end of the expanded route width. On the south end of the expanded route width, potentially all of the trees might have to be cleared. There is one home on the west side of the southern portion of the expanded route width. Much of the southern portion of the expanded route width is currently in row crop production. If the ROW is shifted westerly in this area, additional agricultural impacts could occur as a result of transmission line structures being shifted into the field. On the northern portion of the expanded route width, there is a natural gas compressor station, rather than agricultural production, so agricultural impacts are not anticipated. There are no water resources within the expanded route width. Likewise, Great River Energy is not aware of any sensitive wildlife or habitat resources within the expanded route width. In general, impacts within the expanded route width would be anticipated to be similar to other transmission line construction projects; these impacts are described generally in Sections 7.2.4 (aesthetics), 7.4.1 (agriculture), 7.6 (natural environment), and 7.6.3 (flora and fauna) of the Application. Great River Energy would employ the avoidance, minimization, and mitigation measures described in the Application for applicable resources and impacts within the expanded route width.
7. **How will the area be restored and timeline for restoration** – The expanded route width would be restored using the same procedures and timeline as restoration on the remainder of the Project's route, which are described in Section 6.6 of the Application. These procedures include compaction alleviation, as applicable, particularly on agricultural properties.
8. **Describe the circumstances that would lead GRE to use/not use the expanded route width.** – Great River Energy proposed the expanded route width in response to comments from the Cities of St. Joseph and St. Cloud regarding a potential future road expansion in this area. Since reviewing those comments, Great River Energy has engaged in additional coordination with the City of St. Cloud, as well as the City of St. Joseph, and understands that the Cities' plans for a road expansion are, as of yet, undefined – there is no specific design or timeline for any road expansion. Although Great River Energy has an existing transmission facility along this road and proposed to follow that existing line for this Project to avoid and minimize human and environmental impacts, Great River Energy understands that, to the extent that road expansion plans become sufficiently defined to allow it, it is efficient and practical to design this Project with that future road expansion in mind. However, Great River Energy notes that it does have easements along this road for its existing facility, and shifting the Project within the expanded route width would require additional land rights.

   On the southern portion of the expanded route width, Great River Energy identified an expanded route width of 250 feet. On the northern portion of the expanded route width, Great River Energy identified an expanded route width of 450 feet. Great River Energy identified a wider expanded route width in this area because there is an existing natural gas compressor station that would also be impacted to the extent the road expands to the west, and additional space would be required to accommodate both the Project and the natural gas compressor station. Great River Energy is not aware of any plans to relocate the natural gas compressor station, however, and any relocation would also require relocating the pipeline segments connecting to that station.

Great River Energy's expanded route width represents its best effort at this time to understand the Cities' potential future road expansion plans, and Great River Energy has shared this route width with the Cities. However, as noted above, at this time, the Cities' potential future road expansion plans are not sufficiently defined to allow Great River Energy to determine whether shifting the Project's proposed alignment and using the expanded route width would be appropriate, given that it will result in additional tree clearing, potential agricultural impacts, and would require new right-of-way.

With respect to the northern portion of the expanded route width, to the extent the Cities are able to provide a road expansion design prior to the time Great River Energy commences final design for the Project, Great River Energy could seek to use the expanded route width. However, the road expansion design would need to also reflect an agreement to relocate the natural gas compressor station and landowner agreement. Great River Energy will commence final design after a route permit is issued for the Project. To the extent that the Cities have a sufficiently detailed road expansion design prior to that time, Great River Energy could use the expanded route width, and that alignment would be reflected in the compliance filings (including the plan and profile) submitted to the MPUC prior to Project construction.

With respect to the southern portion of the expanded route width, where there are residential parcels roughly north of Black Spruce Street and immediately east of 73rd Ave, Great River Energy is amenable to moving the transmission line sufficiently west without the cities having a complete design, funding or schedule for the section of 73rd Ave approximately north of Black Spruce St to where there are no existing residential properties immediately east of 73rd Avenue if the impacted landowners are willing to negotiate a new easement for the transmission line. The expanded route to the south is less likely to be used if the impacted landowners are not willing to negotiate a new easement.

Great River Energy is continuing to engage with the Cities on this issue, but at this time does not have further updates beyond what was provided in its November 22, 2022 filing. Great River Energy will provide further updates on this issue to the extent it receives further information from the Cities as this permitting process continues.

DR 01-02 RESPONSES

Please provide a comprehensive assessment of other proposed or anticipated projects in the area adjacent to and surrounding the project area as well as timing of any actions. To respond to this request, Great River Energy contacted the following offices/individuals:

- City of St. Joseph – Nate Keller, Community Development Director and Randy Sabart, SEH consulting engineer, emailed March 27, 2023
- City of St. Cloud – Matt Glaesman, Community Development Director, emailed March 27, 2023
- Stearns County – Mike Decker, Highway Department Engineer, phone conversation March 28, 2023; Benjamin Anderson, Parks Director, emailed March 28, 2023
- BNSF Railroad – Patricia Villegas, Permitting Director, emailed March 24, 2023; Northern Lines Railway, office answering machine, left voice mail requesting a call back.

Information gathered by Great River Energy through this outreach is identified below. Great River Energy further notes that, because it owns existing facilities in this area, it would generally expect to be notified or made aware of any forthcoming projects that would impact any of its existing facilities. Except as noted below, Great River Energy has not been notified of any such activities.

This includes:

1. **Potential local or state roadway improvements**. The City of St. Cloud identified a potential future road expansion, as discussed in DR01-01. See attached emails from Randy Sabart and Matt Glaesman. The timing of this expansion is undetermined, and it is not slated to occur within the next five years.

   Based on the conversation with Mike Decker, Stearns County has plans to add a roundabout at County Road 133 and County Road 4 in 2023 CSAH 4/CSAH 133 Roundabout | Stearns County, MN - Official Website (stearnscountymn.gov). The County also plans to construct a concrete divider on County Road 133 from County Road 75 to County Road 4 starting in 2024. The counties 5-year plan has several other projects identified 5-Year Construction Project Plan | Stearns County, MN - Official Website (stearnscountymn.gov).

2. **Developments within the business park.** See attached email from Randy Sabart.
3. **Changes to the bike trail**. The County and MnDOT have previously confirmed that no changes to the bike trail in the vicinity of the Project are currently contemplated. *See* Great River Energy's November 22, 2022 filing, at p. 7 and Attachment D.
4. **Improvements or construction activities associated with the adjacent railroad**. The railroad did not respond to Great River Energy's request for information. Nonetheless, Great River Energy notes that it owns existing facilities on this route, and it has not been made aware of any railroad activities in the vicinity of this area.
5. **Water/Sewer Line improvements.** Neither the City of St. Joseph nor the City St. Cloud have identified any sewer projects in the next 5 years.