

# **Appendix F**

## **Agency Correspondence**



October 18, 2025

[Address Block]

RE: Requesting Comments on a Revised High Voltage Transmission Line in Cottonwood for Plum Creek Wind Farm

Dear [Name],

Plum Creek Wind Farm, LLC (“Plum Creek”), a wholly owned subsidiary of National Grid Renewables, LLC, would like to update you on the proposed changes for a portion of the approved 345 kilovolt (kV) high voltage transmission line (HVTL Project) associated with the up to 414 megawatt (MW) Plum Creek Wind Farm (Wind Farm) in Cottonwood, Murray, and Redwood Counties, Minnesota.

Plum Creek plans to submit a Route Permit Amendment Request (RPAR) for the HTVL Project to the Minnesota Public Utilities Commission (“PUC”) requesting a change the southern approximately 7.5 miles of the HVTL Project (referred to as the Ordered Route Segment) to a shorter, approximately 4.1-mile-long, optimized route (referred to as the Optimized Route Segment) that will connect Collector Substation 2 to the revised location of Collector Substation 1 (Revised Collector Substation 1) in Ann Township, Cottonwood County. Table 1 provides the revised sections of land that Plum Creek is evaluating for siting the HTVL.

Changes to the location of Collector Substation 1 will be addressed in a Site Permit Amendment Request (SPAR) that will be submitted concurrently with the RPAR.

**Table 1: Location of Optimized and Order Route Segments**

Route Segment	County	Township	Range	Section(s)
Optimized Route Segment	Cottonwood	108N	38W	5-7, 18-19
	Redwood	108N	38W	5-6
		109N	38W	32-33
Ordered Route Segment	Cottonwood	108N	38W	3-5, 8-10, 15-20
	Redwood	108N	38W	4-5
		109N	38W	32-33



Please find enclosed an updated map of the Plum Creek HTVL route and the associated corridor.

If you require further information or have questions regarding this matter, please contact me at 952.988.9000 or at [marta@nationalgridrenewables.com](mailto:marta@nationalgridrenewables.com).

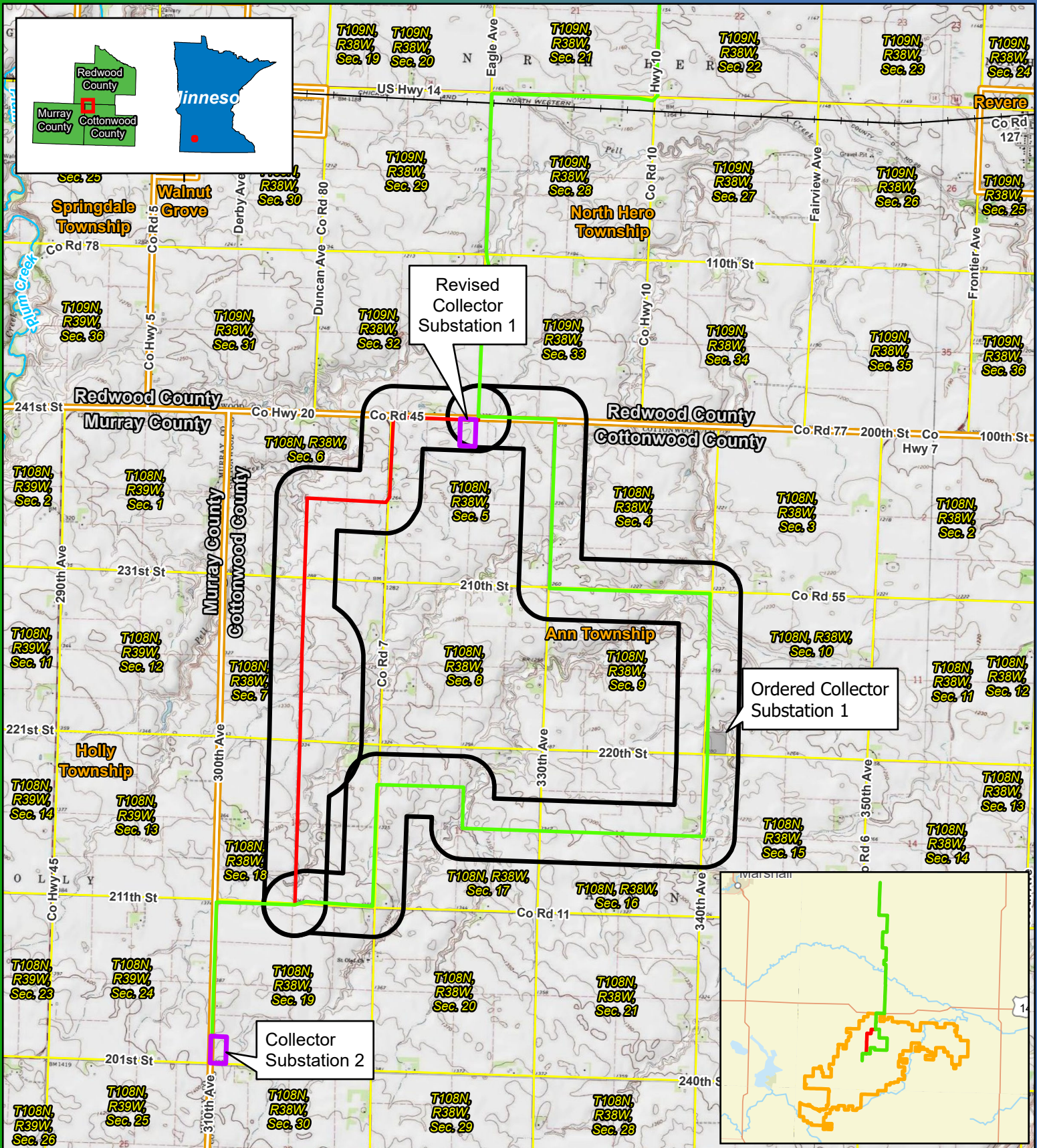
Sincerely,

A handwritten signature in grey ink that reads "Marta Lasch".

Marta Lasch  
Permitting Lead  
National Grid Renewables, LLC  
on behalf of Plum Creek Wind Farm, LLC  
8400 Normandale Lake Blvd., Ste 1200  
Bloomington, MN 55437

Enclosure:  
Plum Creek Location Map





0 2,000 4,000 Feet

Data Source: National Grid Renewables, US Census, USGS, MDNR

Document Path: Z:\Clients\W\_P\National\_Grid\Plum\_Creek\_Wind\ArcGIS\Permitting\State\Route\_Permit\Figures\Figures.aprx

Figure 1  
Route Permit Amendment  
Request Overview  
  
Plum Creek HVTL Project  
  
Redwood and  
Cottonwood Counties, MN

- Optimized Route Segment
- Ordered Route Segment
- Route Width
- Collector Substation
- Ordered Collector Substation 1
- +— Railroad
- NHD Named Stream
- Section Boundary
- City/Township
- County Boundary

Date: 10/16/2024

## Plum Creek HVTL Project

Meeting with Suzanne Steinhauer at EERA 10-16-24

Topic: Route Permit Amendment Request (RPAR) and updates on the Site Permit Amendment Request (SPAR)

National Grid Renewables Attendees: Marta Lasch, Jeremy Duehr, Monika Davis

- Marta introduced the changes to HVTL Project that will be discussed in the RPAR and change to location of collector sub that will be discussed in the SPAR
  - Minor shift in one turbine to allow route to go straight north-south
  - Requesting extension in construction start and in-service dates – being driven by 23-12 docket
  - Still at 345 kV, structures, conductors, not changing
- Suzanne recommends:
  - Acknowledge BESS and refer to the docket where that is disclosed
  - Be clear about why Plum Creek is seeking amendment, what the amendment would do, cross reference apps.
- Does NGR have easement agreements? Yes
- Current request was not considered in the first proceeding
- Submitting both at once? Yes
- Probably still Suzanne as EERA contact
- 23-12 docket – indicated working on ER for this docket
- Busy until Tuesday before Thanksgiving – Suzanne
- Maybe could look at draft sometime in mid-November – not before the 15<sup>th</sup>
- EERA is hiring, but not likely to start until mid-November. Everybody is very busy.
- We still have some work to do, wanted to preview this with Suzanne to solicit any early comments so we can incorporate into the draft.
- NG Renewables may submit prior to 11/15 but understand the schedule constraints

## Plum Creek HVTL Project

Meeting with Minnesota Department of Natural Resources (MDNR), 10-21-24

Topic: Route Permit Amendment Request (RPAR) and updates on the Site Permit Amendment Request (SPAR)

MDNR Attendees: Martin Donovan, Haley Byron, Samantha Bump

National Grid Renewables Attendees: Marta Lasch (NGR), Jeremy Duehr (Fredrikson & Byron), Sophia Gilleland (NGR), Monika Davis (Merjent)

Marta introduced the Optimized Route Segment and Revised Collector Substation 1

Questions/conversation:

- Haley: Is tree clearing required for the new sub?
  - No.
  - A portion of the optimized route segment will require removal of trees in a windrow. The landowner wants these trees removed.
- Haley commented she does not have concerns with wind turbine shifts that will be requested with the SPAR.
- The Site of Biodiversity Significance (SOBS) and Native Plant Community (NPC) that are within the right-of-way of the Optimized Route Segment should be avoidance areas during construction and ROW maintenance.
  - We could fence the area off to avoid disturbance during construction.
  - NGR requested a list of measures MDNR would like to see if ROW overlaps this area.
- NPC = Dry upland prairie, does not include the trees. Haley needs to check with regional ecologist regarding plant community type in NPC.
- Optimized route should have fewer impacts on flight corridors, crossing fewer drainages.
- NGR is trying to balance landowner preferences with resource protection.
- NGR is planning to file the RPAR in late December or early January.
- What additional information can NGR provide?
  - Haley requested shapefile of alignment and ROW, access roads. Haley will send to regional ecologist to request measures that could be used to protect the SOBS and NPC.
  - NGR will provide the shapefile, as requested.

## **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:

10/10/2024 19:07:55 UTC

Project Code: 2025-0004549

Project Name: Plum Creek\_Optimized\_2000

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  $\geq 3$  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 range-wide northern long-eared bat 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](mailto:Review.NHIS@state.mn.us)

#### *Wisconsin*

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

Email: [DNRERReview@wi.gov](mailto: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

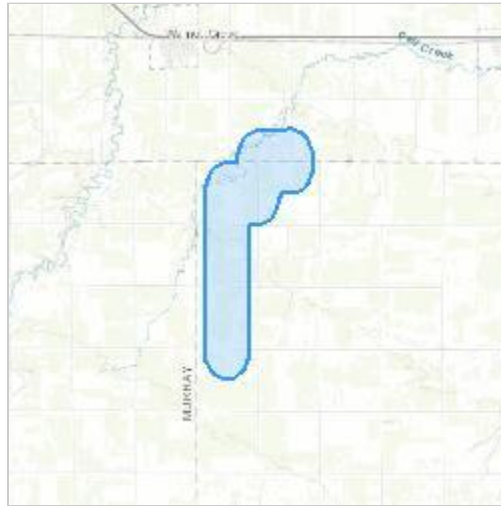
Bloomington, MN 55425-1659

(952) 858-0793

## PROJECT SUMMARY

Project Code: 2025-0004549  
Project Name: Plum Creek\_Optimized\_2000  
Project Type: Transmission Line - New Constr - Above Ground  
Project Description: X  
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@44.17412565,-95.45257976373432,14z>



Counties: Cottonwood and Redwood counties, Minnesota

## ENDANGERED SPECIES ACT SPECIES

There is a total of 1 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 Fisheries<sup>1</sup>, 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.

- 
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: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## 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.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

## BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act<sup>1</sup> and the Migratory Bird Treaty Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats<sup>3</sup>, 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. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	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 (■)

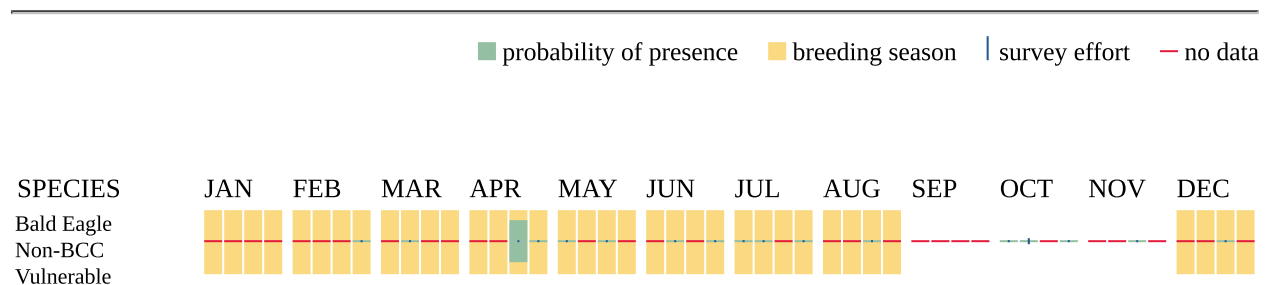
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

### 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 Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats<sup>3</sup> 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
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. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Dec 1 to Aug 31
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9454">https://ecos.fws.gov/ecp/species/9454</a>	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. <a href="https://ecos.fws.gov/ecp/species/9406">https://ecos.fws.gov/ecp/species/9406</a>	Breeds Mar 15 to Aug 25

NAME	BREEDING SEASON
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 <a href="https://ecos.fws.gov/ecp/species/8329">https://ecos.fws.gov/ecp/species/8329</a>	Breeds Jun 1 to Aug 20
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9679">https://ecos.fws.gov/ecp/species/9679</a>	Breeds elsewhere
Pectoral Sandpiper <i>Calidris melanotos</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9561">https://ecos.fws.gov/ecp/species/9561</a>	Breeds elsewhere

## 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 (|)

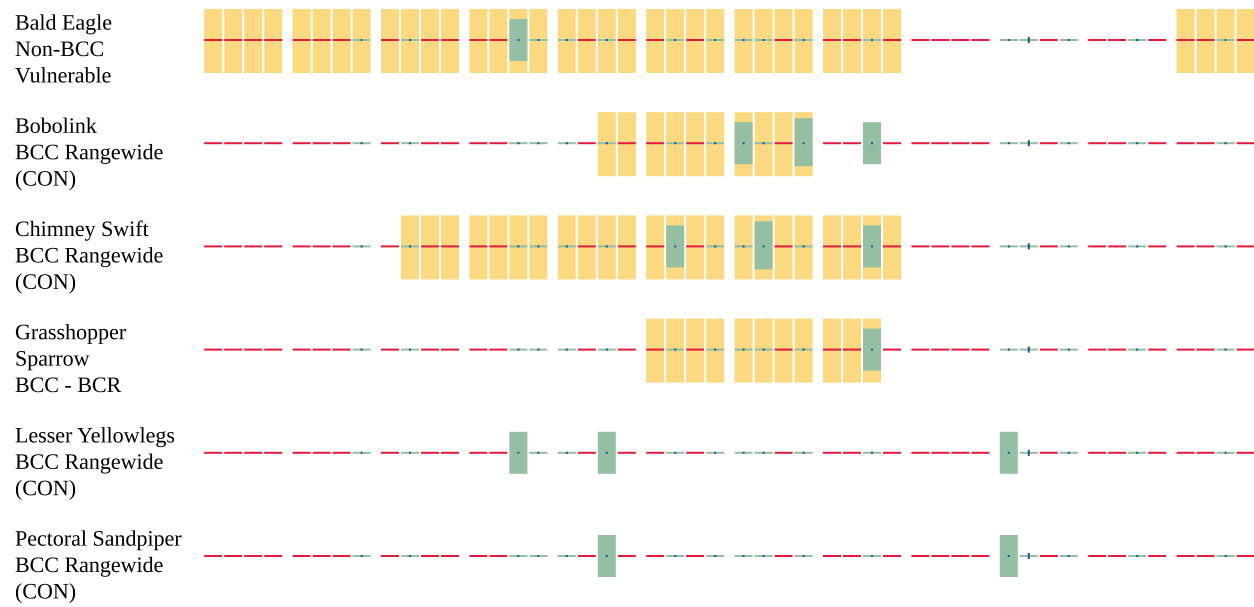
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

### No Data (—)

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

■ probability of presence   ■ breeding season   | survey effort   — no data

SPECIES   JAN   FEB   MAR   APR   MAY   JUN   JUL   AUG   SEP   OCT   NOV   DEC



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.

### FRESHWATER FORESTED/SHRUB WETLAND

- PFO1A
- PFO1B

FRESHWATER EMERGENT WETLAND

- PEM1Ch
- PEM1C
- PEM1A
- PEM1B

FRESHWATER POND

- PUBFh
- PUBFx

RIVERINE

- R4SBC



## **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\_Route Permit Amendment

**Project Proposer:** Plum Creek Wind Farm, LLC

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

**Project Type Activities:** Other

**TRS:** T108 R38 S18, T108 R38 S19, T108 R38 S5, T108 R38 S6, T108 R38 S7

**County(s):** Cottonwood

**DNR Admin Region(s):** South

**Reason Requested:** PUC Site or Route Application

**Project Description:** Plum Creek Wind Farm, LLC (Plum Creek), a wholly owned subsidiary of National Grid Renewables Development, LLC (NG Renewables), is preparing a Route Permit ...

**Existing Land Uses:** Land along the Optimized Route Segment is predominantly rural with sparsely scattered rural residences, farmsteads, commercial livestock operations, and agricultural support facilities throughout.

**Landcover / Habitat Impacted:** Cultivated crops and developed lands.

**Waterbodies Affected:** None

**Groundwater Resources Affected:** None

**Previous Natural Heritage Review:** No

**Previous Habitat Assessments / Surveys:** No

### SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	No Comments	No Further Review Required
Ecologically Significant Area	Comments	MBS Sites - Recommendations Potential RNC - Will Require Consultation
State-Listed Endangered or Threatened Species	No Comments	No Further Review Required
State-Listed Species of Special Concern	No Comments	No Further Review Required
Federally Listed Species	No Records	Visit IPaC For Federal Review



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

October 10, 2024

Project ID: MCE #2024-00861

Andrea Sampson  
Merjent, Inc.  
1 Main Street SE, Suite 300  
Minneapolis, MN 55414

RE: Automated Natural Heritage Review of the proposed Plum Creek\_Route Permit Amendment  
See Cover Page for location and project details.

Dear Andrea Sampson,

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:

*Ecologically Significant Area*

- The Minnesota Biological Survey (MBS) has identified one or more Sites of Biodiversity Significance within or adjacent to the project boundary. 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. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape.

High or Moderate MBS Site - One or more MBS Sites of Biodiversity Significance ranked High or Moderate may be impacted by the proposed project. Sites ranked as High contain very good quality occurrences of the rarest species, high quality examples of the rare native plant communities, and/or important functional landscapes. 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. The DNR recommends that the project be designed to avoid impacts to these ecologically significant areas. Actions to avoid or minimize disturbance include, but are not limited to, the following recommendations:

- Retain a buffer between proposed activities and the MBS Site,
- Minimize project footprint within the MBS Site,
- Operate within already-disturbed areas,
- Minimize vehicular disturbance within the MBS Site,
- Do not park equipment or stockpile supplies within the MBS Site,

- Do not place spoil within the MBS Site,
  - Inspect and clean equipment prior to operating within the MBS Site, and follow other recommendations to [prevent the spread of invasive species](#),
  - Conduct the work under frozen ground conditions,
  - Use effective erosion prevention and sediment control measures,
  - Revegetate disturbed soil with native [seed mixes](#) suitable to the local habitat as soon after construction as possible,
  - Use only weed-free mulches, topsoils, and seed mixes.
- One or more DNR Native Plant Communities have been identified within or adjacent to the proposed project (for a list of all the native plant community types, please run a Conservation Planning Report; spatial data can be viewed on the Explore Page). DNR Native Plant Community types and subtypes are given a [Conservation Status Rank](#) that reflects the relative rarity and endangerment of the community type in Minnesota. Conservation Status Ranks range from S1 (critically imperiled) to S5 (secure, common, widespread, and abundant).

**Rare Native Plant Communities** - One or more rare native plant communities may be impacted by the proposed project. Native plant communities with a Conservation Status Rank of S1 through S3 are considered rare in the state, and the DNR recommends avoidance of these ecologically significant areas. In addition, please note that native plant communities with a Conservation Status Rank of S1 through S3 may qualify as Rare Natural Communities (RNC) under the Wetland Conservation Act (WCA). If the proposed project includes a wetland replacement plan under WCA, please contact your [DNR Regional Ecologist](#) for further evaluation. Please visit [WCA Program Guidance and Information](#) for additional information, including the [Rare Natural Communities Technical Guidance](#).

#### *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*

No state-listed species of special concern have been documented in the vicinity of the project.

#### *Federally Listed Species*

The Natural Heritage Information System does not contain any records for federally listed species within one mile of the proposed project. Please note, however, that not all federally listed species are tracked within the NHIS. 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 before 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. 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,

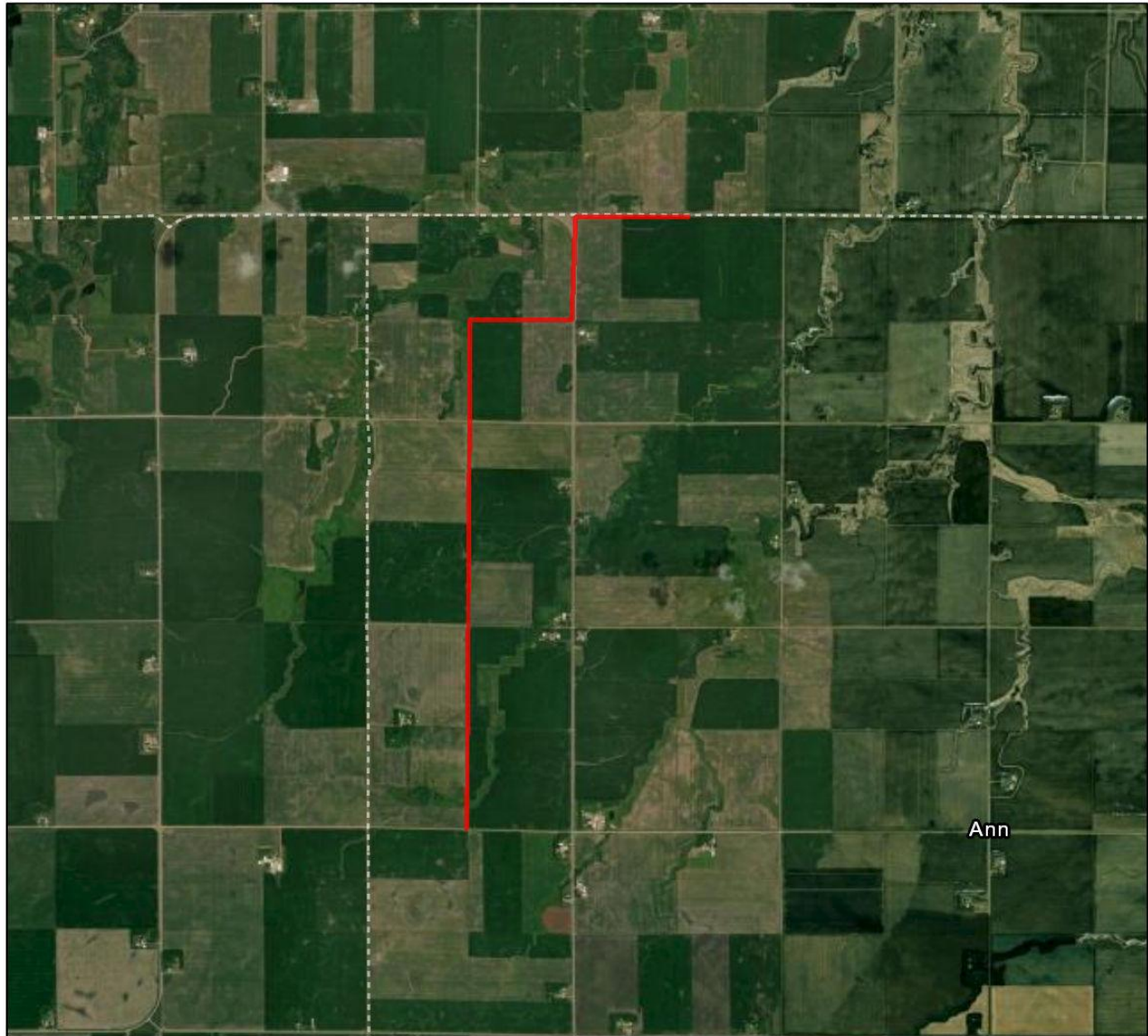
*Jim Drake* Jim Drake  
Natural Heritage Review Specialist  
[James.F.Drake@state.mn.us](mailto:James.F.Drake@state.mn.us)

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](https://www.dnr.state.mn.us/eco/ereview/erp_regioncontacts.html)



# Plum Creek Route Permit Amendment

Aerial Imagery With Locator Map



0 0.3 0.6 1.2 1.8 2.4 Miles

Project\_Boundary

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

Project Size (acres): 9.78

County(s): Cottonwood

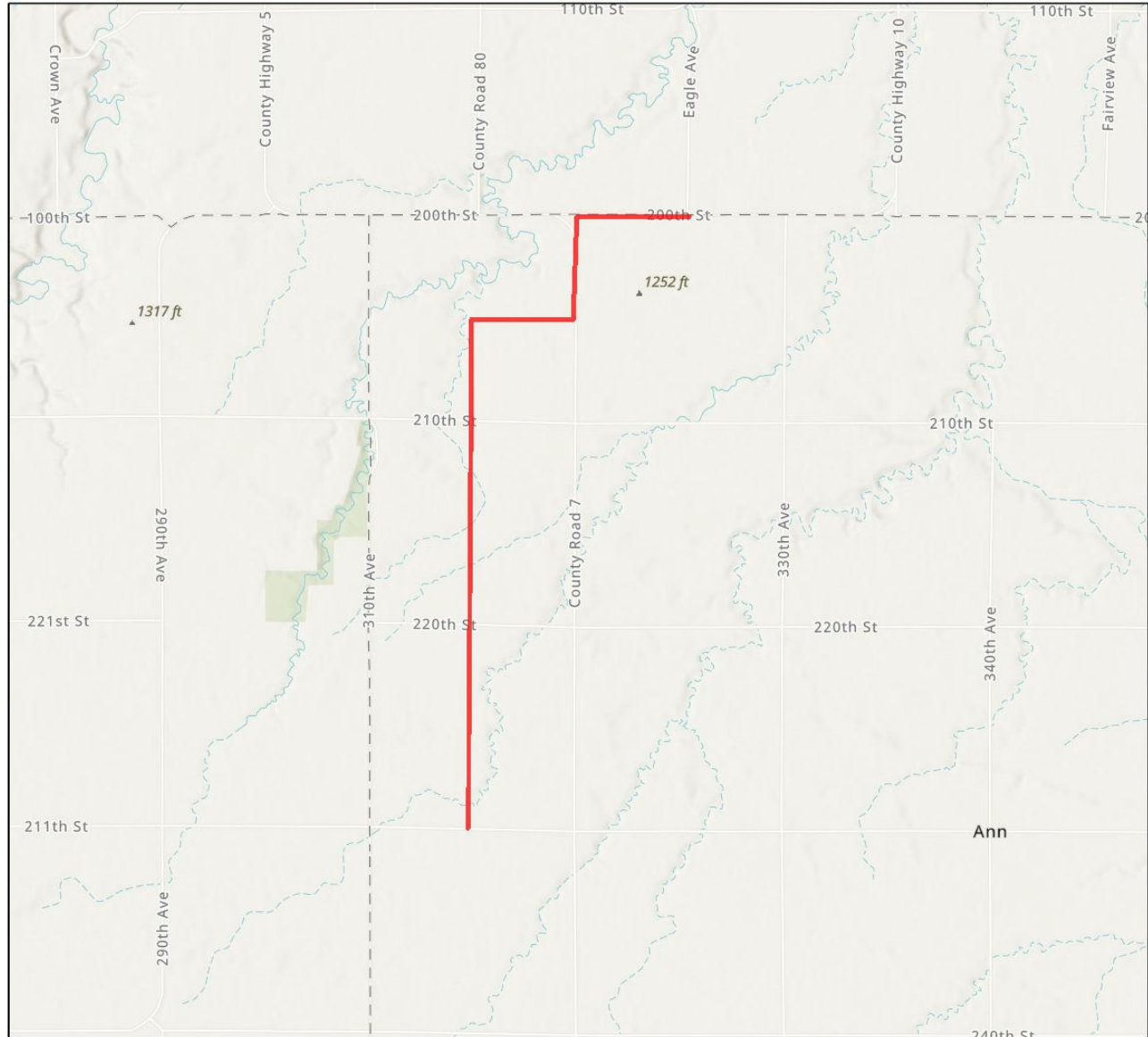
TRS: T108 R38 S18, T108 R38 S19, T108 R38 S5, T108 R38 S6, T108 R38 S7

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS  
Earthstar Geographics  
Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,



# Plum Creek\_Route Permit Amendment

## USA Topo Basemap With Locator Map



0 0.3 0.6 1.2 1.8 2.4 Miles

 Project\_Boundary

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

Project Size (acres): 9.78

County(s): Cottonwood

TRS: T108 R38 S18, T108 R38 S19, T108 R38 S5, T108 R38 S6, T108 R38 S7

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS  
Esri, NASA, NGA, USGS, FEMA  
Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,



**From:** [Byron, Haley \(DNR\)](#)  
**To:** [Marta Lasch](#); [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 3:15:47 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image009.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.jpg](#)  
[image001.png](#)

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**CAUTION:** This email originated from outside of Merjent.

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](mailto:haley.byron@state.mn.us)

[mndnr.gov](http://mndnr.gov)



---

**From:** Marta Lasch <[mlasch@nationalgridrenewables.com](mailto:mlasch@nationalgridrenewables.com)>

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

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

**Cc:** Sophia Gilleland <[sgilleland@nationalgridrenewables.com](mailto: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](mailto: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](mailto:mlasch@nationalgridrenewables.com)>

**Sent:** Wednesday, December 11, 2024 10:18 AM

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

**Cc:** Sophia Gilleland <[sgilleland@nationalgridrenewables.com](mailto: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

952.988.9000



---

**From:** Byron, Haley (DNR) <[Haley.Byron@state.mn.us](mailto:Haley.Byron@state.mn.us)>

**Sent:** Monday, October 28, 2024 2:45 PM

**To:** Marta Lasch <[marta@nationalgridrenewables.com](mailto:marta@nationalgridrenewables.com)>; Donovan, Martin (DNR) <[Martin.Donovan@state.mn.us](mailto:Martin.Donovan@state.mn.us)>; Duehr, Jeremy <[JDuehr@fredlaw.com](mailto:JDuehr@fredlaw.com)>; Monika Hagebak Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>; Bump, Samantha (DNR) <[Samantha.Bump@state.mn.us](mailto:Samantha.Bump@state.mn.us)>

**Cc:** Sophia Gilleland <[sgilleland@nationalgridrenewables.com](mailto: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](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



---

**From:** Marta Lasch <[marta@nationalgridrenewables.com](mailto:marta@nationalgridrenewables.com)>

**Sent:** Friday, October 25, 2024 12:46 PM

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

**Cc:** Sophia Gilleland <[sgilleland@nationalgridrenewables.com](mailto:sgilleland@nationalgridrenewables.com)>

**Subject:** RE: Plum Creek Wind - HVTL

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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



**Marta Lasch**

Permitting Lead

**P** 612.259.3093

**E** [marta@nationalgridrenewables.com](mailto:marta@nationalgridrenewables.com)

952.988.9000



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

---

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