

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

June 26, 2026

Sam Weaver
Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Xcel Energy and Echo Zone LLC for a Route Permit for the North Rochester to Skyway High Voltage Transmission Line Project in Goodhue County.
PUC Docket Number: E002/TL-26-135

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application for the North Rochester to Skyway 345 kV High Voltage Transmission Line (HVTL) project (Project), proposed by Northern States Power Company, doing business as Xcel Energy, and Echo Zone LLC, a subsidiary of Google LLC (Applicants). Our agency offers the following comments:

Lighting

The DNR recommends including a permit condition to utilize downlit and shielded lighting and minimize blue hue to reduce harm to birds, insects, and other animals. Animals depend on the daily cycle of light and dark for behaviors such as hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. Potential project impacts related to illuminated facilities can be avoided or minimized by using shielded and downward facing lighting. We recommend using a nominal color temperature below 2700K, which is preferable for wildlife.

If feasible, we also recommend that all non-essential lighting be turned off during the Mayfly hatch and following the [Audubon Society's Lights Out](#) program. This program advocates for darkening all buildings and structures during the bird migration from midnight until dawn March 15 - May 31 and August 15 - Oct 31.

Avian Flight Diverters

To prevent avian collisions due to visibility issues, the DNR recommends including a permit condition that the Applicant will coordinate with the DNR to determine appropriate locations for avian flight diverters after the route is finalized. Generally, the avian flight diverters will be needed at river crossings, fragmented forested patches, and near lakes and wetlands. The use of avian flight diverters minimizes the number of bird collisions with the transmission lines. Standard transmission line design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices.

Vegetation Clearing Timing

The DNR recommends including a special permit condition requiring the Applicants to avoid tree removal from June 1 through August 15. This minimizes impacts to some bird species and bats, including the federally endangered northern long-eared bat, during the maternity roosting season when pups are unable to fly.

Wildlife-Friendly Erosion Control

Due to entanglement issues with small animals, the DNR recommends including a permit condition that erosion control blankets be limited to “bio-netting” or “natural netting” types, and specifically not products containing plastic mesh netting or other plastic components. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength; these loose fibers could potentially re-suspend and make their way into waterways.

Dust Control

The DNR recommends including a permit condition to avoid products containing calcium chloride or magnesium chloride, which are often used for dust control. Chloride products that are released into the environment do not break down, and instead accumulate to levels that are toxic to plants and wildlife.

DNR Permitting: Water Appropriation

A DNR Water Appropriation Permit is required for all users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year. The permit can be applied for in the [MNDNR Permitting and Reporting System \(MPARS\)](#).

The DNR appreciates the opportunity to comment on the construction and operation of the proposed North Rochester to Skyway 345 kV HVTL Project. Please contact me if you have questions about our agency's comments.

Sincerely,

Samantha Bump

Digitally signed by Samantha

Bump

Date: 2026.06.26 15:33:43 -05'00'

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