Appendix C

Agency, Tribal and Local Government Unit Contacts and Correspondence

Appendix C-1

Agency Correspondence

TABLE C1-1

Agency Contacts

Agency Name	Contact Name and Title
FEDERAL AGENCIES	
U.S. Army Corps of Engineers	Paul Leffler, Project Manager
	Catherine Beatty, Project Manager
U.S. Fish and Wildlife Service, Region 3 Minnesota-Wisconsin Ecological Services Field Office	Katie O'Brien, Minnesota Projects
U.S. Fish and Wildlife Service, Upper Mississippi River National Wildlife and Fish Refuge	Sabrina Chandler, Refuge Manager
U.S. Department of Agriculture, Natural Resources Conservation Service	Troy Daniell, State Conservationist
	Luther Newton, Southeast Assistant State Conservationist – Field Operations
	Christopher Schmidt, District Conservationist
	Jessica Bronson, Soil Conservationist
	Teddy Morenosantos, Soil Conservationist
U.S. Department of Agriculture, Farm Service Agency	Cassie Buck, Chief Agricultural Program Specialist
STATE OF MINNESOTA	
Board of Water and Soil Resources	Dilan Christiansen, Wetland Conservation Act
	TBD, Water Programs Coordinator
	Karli Swenson, Conservation Easement Specialist
Department of Agriculture	Stephan Roos, Environmental Review Program Manager, Energy and Environment Section
Department of Health	Amanda Strommer, Drinking Water Protection – Wellhead Protection Program, Planner
	Yarta Clemens-Billaigbakpu, Drinking Water Protection – Wellhead Protection Program, Hydrologist
	Scott Hanson, Wellhead Protection Program Planner
	Allison Friello, Wellhead Protection Program Hydrologist
	Dereck Richter, Surface Water Protection Program
	Danielle Nielsen, Surface Water Protection Program
	David Bell, Environmental Research Scientist
Department of Labor and Industry	Dean Hunter, Assistant Chief Electrical Inspector
Department of Natural Resources	Melissa Collins, Ecological and Water Resources Division, Regional Environmental Assessment Ecologist
	Samantha Bump, Ecological and Water Resources Division, Energy Review Planner
	Martin Donovan, Ecological and Water Resources Division, Energy Review Planner
	Keylor Andrews, Ecological and Water Resources Division, Calcareous Fen Program Coordinator
	Benjamin Schaefer, Lands & Minerals Division, Region 4 (South) Regional Operations Coordinator
	Claire Olson, Lands & Minerals Division, Region 3 (Central) Regional Operations Coordinator
	Haley Byron, Ecological and Water Resources Division, Environmental Review Program
	Todd Piepho, Area Hydrologist
	Nicole Lehman, Area Hydrologist
	Lucas Youngsma, Area Hydrologist
	Kate Fairman, Environmental Review Coordinator, Environmental Review Operations Lead

TABLE C1-1

Agency Contacts

Agency Name	Contact Name and Title
Department of Public Safety	Jonathan Wolfgram, Office of Pipeline Safety / Office of State Safety Oversight, Director
Department of Revenue	Alan Whipple
Department of Transportation	Stacy Kotch Egstad, Utility Routing and Siting Coordinator
	Beth Brown, Wetland Conservation Act, Wetland Program Coordinator
	Nathan Gregor, Wetland Conservation Act – District 6
	Mark Schoenfelder, District 6 (Southeast Minnesota Regional) Engineer
	TBD, Aeronautics – Aviation Planning
Indian Affairs Council	George J. Goggleye Jr. , Cultural Resources Manager
	Isaac Weston, Cultural Resources Manager
State Historic Preservation Office	MN_ADM_ENV Review SHPO
Office of the State Archaeologist	Amanda Gronhovd, MN State Archaeologist
Department of Public Safety, Office of Pipeline Safety	Jonathan Wolfgram, Director
Pollution Control Agency	Chris Green
LOCAL	
Fillmore County	Blake Lea, Wetland Conservation Act, Land Use Director
	Riley Buley, Soil and Water Conservation District, District Administrator
	Ronald Gregg, County Engineer
Goodhue County	Megan Smith, Land Use Management Director
	Beau Kennedy, Soil and Water Conservation District, District Manager
	Ben Dvorak, Soil and Water Conservation District, Wetland Conservation Act
	Jess Greenwood, County Engineer
Houston County	Amelia Meiners, Planning and Zoning, Wetland Conservation Act
	Brian Pogodzinski, County Engineer
Mower County	Cody Fox, Soil and Conservation District, District Manager
	Steve Lawler, Soil and Water Conservation District, Wetland Conservation Act
	Angie Lipelt, Zoning and Land Use, Environmental Services Supervisor
	Mitch Wenum, PE, County Engineer
Olmsted County	Skip Langer, Soil and Conservation District, Soil Conservation Manager, Wetland Conservation Act
	Allison Sosa, Planning, Land Use & Zoning, Planning Supervisor
	Benjamin Johnson, County Engineer
Wabasha County	Terri Peters, Soil and Water Conservation District, District Manager
	Joseph Kaltenbach, Planning and Zoning Administrator
	Keaton Tollakson, Wetland Conservation Act
	Dietrich Flesch, County Engineer
City of Rochester	Don VanKeulen, Wetland Conservation Act
Root River Soil and Water Conservation District	Dave Walter, District Manager
Southwest Regional Development Commission	Jayme Trusty, Executive Director
Mississippi River Parkway Commission	Senator Karin Housley

TABLE C1-2

Agency Correspondence

Jurisdiction / Agency	Date	Summary of Correspondence
FEDERAL AGENCIES		
U.S. Army Corps of Engineers	1/16/26	Pre-application meeting with USACE.
	1/20/26	USACE asked for additional information to assign a Corps project number (MVP-2026-00083).
	1/15/26 to 3/23/26	Email correspondence regarding bridge height clearance requirements.
	5/1/26	216I Project introduction letter and route options map sent.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	9/15/26-10/5/26	Meeting coordination with USACE.
	10/9/26	Meeting with USACE to provide state permitting updates, discuss federal permitting plan, status of land exchange with USFWS and Project design basis (bridge clearances).
U.S. Fish and Wildlife Service, Region 3 Minnesota-Wisconsin Ecological Services Field Office	5/1/26	216I Project introduction letter and route options map sent.
	5/1/26	Automatic reply from USFWS with background information.
	8/5/26	Applicants submitted query through the USFWS Information for Planning and Consulting System (IPaC) (Project Code: 2026-0104431).
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/20/26	USFWS provided response identifying process for further coordination and general recommendations for conservation measures for federally protected species and habitat.
U.S. Fish and Wildlife Service, Upper Mississippi River National Wildlife and Fish Refuge	12/15/25	Meeting with the USFWS to discuss Mississippi River crossing analysis.
	1/20/26	Pre-application follow-up.
	1/21/26	Meeting with USFWS to discuss parcel identification and review.
	3/2/26	The Applicants provided a fact sheet to USFWS for review.
	3/4/26	The Applicants provided formal notice of intent to initiate a land exchange.
	3/20/26	The Applicants provided fact sheets to USFWS on the existing right-of-way and potential lands at Jack Oak Island in Pool 11.
	3/23/26	Meeting with USFWS to initiate land exchange discussion.
	4/1/26	Response from USFWS acknowledging receipt of intent to initiate land exchange.
	4/24/26	Meeting to discuss intent to initiate land exchange.
	5/1/26	216I Project introduction letter and route options map sent.
	5/18/26	Meeting with USFWS to review Statement of Proposed Land Exchange and environmental review process planning
	5/21/26	Meeting with USFWS to discuss land exchange process.
	6/5/26	Provide email to USFWS with 5/22/26 letter to USFWS identifying parcels for land for exchange.
	6/8/26	Recurring meeting with USFWS to discuss land exchange process.
	7/6/26	Recurring meeting with USFWS to discuss land exchange process.
	7/17/26	Meeting with USFWS to review survey planning updates, Statement of Proposed Land Exchange status, and environmental review requirements.
	8/3/26	Meeting with USFWS to review survey activities updates, Statement of Proposed Land Exchange status, and environmental review requirements.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/31/26	Meeting with USWS to discuss survey data and report status, Statement of Proposed Land Exchange status, Memorandum of Understanding requirements for environmental review, and public outreach updates.
	9/28/26	

TABLE C1-2

Agency Correspondence

Jurisdiction / Agency	Date	Summary of Correspondence
	10/9/26	Meting with USFWS to discuss Statement of Proposed Land Exchange status, including supporting studies and stakeholder engagement updates. Meeting with USFWS to discuss Statement of Proposed Land Exchange status and USFWS review process for draft, schedule updates, USACE coordination updates, and stakeholder outreach updates and needs.
U.S. Department of Agriculture, Natural Resources Conservation Service	5/1/26 8/12/26	216I Project introduction letter and route options map sent. (No response) 216I Project introduction letter and Proposed Route map sent. (No response)
U.S. Department of Agriculture, Farm Service Agency	5/1/26 8/12/26	216I Project introduction letter and route options map sent. (No response) 216I Project introduction letter and Proposed Route map sent. (No response)
STATE OF MINNESOTA		
Board of Water and Soil Resources	5/1/26 8/5/26 8/12/26 8/21/26 8/24/26 8/31/26	216I Project introduction letter and route options map sent. (No response) Applicants sent email with Proposed Right-of-Way crossings of BWSR conservation easements and request for meeting. 216I Project introduction letter and Proposed Route map sent. The Applicants met with BWSR to discuss the conservation easements crossed by the Proposed Rights-of-Way and to discuss the easement process. The Applicants provided shapefiles of the Proposed Route, Proposed Alignment and Proposed Rights-of-Way, in addition to Dairyland's existing 161 kV easements to BWSR for review. BWSR responded with additional details regarding each conservation easement crossed by the Proposed Rights-of-Way based on their preliminary review.
Department of Agriculture	5/1/26 8/12/26 10/22/26	216I Project introduction letter and route options map sent. (No response) 216I Project introduction letter and Proposed Route map sent. (No response) Applicants submitted draft AIMP to MDA for review.
Department of Commerce	5/1/26 8/12/26/	216I Project introduction letter and route options map sent. (No response) 216I Project introduction letter and Proposed Route map sent. (No response)
Department of Health	5/1/26 5/7/26 8/12/26	216I Project introduction letter and route options map sent. MDH responded with comments regarding Drinking Water Supply Management Areas, wells, and karst geology. 216I Project introduction letter and Proposed Route map sent. (No response)
Department of Labor and Industry	5/1/26 8/12/26	216I Project introduction letter and route options map sent. (No response) 216I Project introduction letter and Proposed Route map sent. (No response)
Department of Natural Resources	3/4/26 5/1/26	The Applicants met with the MDNR to provide an overview of the Project. 216I Project introduction letter and route options map sent.

TABLE C1-2

Agency Correspondence

Jurisdiction / Agency	Date	Summary of Correspondence
	6/11/26	The Applicants submitted a Natural Heritage Review Request (No. 2026-00499) via the online Minnesota Conservation Explorer system
	6/12/26	The Applicants provided the Calcareous Fen Program Coordinator a shapefile of the Proposed Alignment
	6/16/26	in advance of meeting for review.
	6/23/26	The Applicants met with the Calcareous Fen Program Coordinator to discuss the Project; meeting notes were provided to MDNR.
	7/28/26	Monthly meeting with the MDNR Environmental Review Unit.
	8/12/26	Monthly meeting with the MDNR Environmental Review Unit.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/13/26	Email sent to MDNR Lands & Minerals Division identifying preliminary right-of-way crossings of public lands and waters and to request federal encumbrances review.
	8/25/26	MDNR responded with corrected list of appropriate MDNR Hydrologists for the Project area.
	8/31/26	Monthly meeting with the MDNR Environmental Review Unit and Lands & Minerals Division.
	9/22/26	MDNR submitted early coordination letter to the Applicants.
	9/25/26	Monthly meeting with MDNR Environmental Review Unit. The Applicants responded to the MDNR's early coordination letter and provided updated Proposed Route shapefile.
	10/20/26	Monthly meeting with MDNR Environmental Review Unit.
	10/28/26	The Applicants provided the MDNR with the notes from the 10/20/26 meeting.
Department of Revenue	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Department of Transportation	5/1/26	216I Project introduction letter and route options map sent.
	5/5/26	MnDOT requested a meeting to introduce the Project to MnDOT staff and to request a .kmz of the proposed alignment.
	6/8/26	The Applicants responded and provided a .kmz of the proposed alignment and meeting poll.
	6/16/26	The Applicants met with the MnDOT to discuss the Project; meeting notes were provided to MnDOT.
	6/16/26	MnDOT provided current Early Notification Memo and Checklist forms.
	7/13/26	Email exchange with MnDOT to request Commissioner's Order number for scenic easements along I-90.
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Indian Affairs Council	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/11/26	Applicants submitted online Project review request to MIAC. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	10/7/26	MIAC responded identifying burial and archaeological sites within the Project area and describing the procedures required to protect burial sites.
State Historic Preservation Office	7/27/26	Applicants submitted Phase Ia Cultural Resources Literature Review.
	8/26/26	SHPO responded concurring with the Applicant's recommendation of additional survey of the route designated by the MPUC.
Office of Pipeline Safety	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Pollution Control Agency	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)

TABLE C1-2

Agency Correspondence

Jurisdiction / Agency	Date	Summary of Correspondence
LOCAL		
Fillmore County	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Goodhue County	5/1/26 and 5/8/26	216I Project introduction letter and route options map sent.
	5/4/26	The Land Use Management Director acknowledged receipt and indicated they are following the Project progress and will follow-up with questions.
	5/12/26	The Goodhue County Wetland Conservation Act Local Government Unit responded providing comments from Mazeppa Township Board of Supervisors.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/17/26	Responded with same letter provided in May 2026 recommending wetland avoidance, use of existing corridors and avoidance of disturbance to wildlife habitat areas and other ecologically sensitive regions.
Houston County	5/1/26 and 5/8/26	216I Project introduction letter and route options map sent.
	7/29/26	Meeting held with County Commissioners and County Highway Department.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/13/26	County Commissioner responded that he is not in support of the Project due questions regarding the necessity of the transmission line and health concerns.
	9/14/26	Winnebago Township in Houston County sent an email to the Applicants indicating opposition to the Project.
	10/28/26	Jefferson Township sent an email in opposition to the Project, expressing concern with potential Project impacts, including impacts to aesthetics, tourism, noise, EMF, agricultural land use, karst geology, damage to township roads, electric bill rates, and property values.
Mower County	5/1/26 and 5/8/26	216I Project introduction letter and route options map sent.
	5/11/26	The Mower County Highway Department acknowledged receipt and indicated they had no comments because the proposed route follows the existing 161 kV transmission route.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/12/26	Response requesting shapefile of Project route and to offer karst inventory data.
	8/14/26	Provided shapefile and responded to karst inventory data.
		Response to questions and provided links to information on EMF.
Olmsted County	5/1/26 and 5/8/26	216I Project introduction letter and route options map sent.
	5/24/26	Requested meeting with the Applicants to introduce the Project.
	6/15/26	The Applicants met with the Olmsted County Highway Department to discuss the Project. The Applicants sent a .kmz of the proposed alignment to staff for review.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/17/26	Acknowledged receipt of 216I letter.
Wabasha County	5/1/26	216I Project introduction letter and route options map sent.
	5/4/26	The Wabasha County Wetland Conservation Act Local Government requested review of wetland impacts and requested a shapefile of the route.

TABLE C1-2

Agency Correspondence

Jurisdiction / Agency	Date	Summary of Correspondence
	5/8/26	The Applicants provided a .kmz of the current route options that were being considered and provided an overview of the permitting timeline.
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	9/3/26	Mazeppa Township providing comments on the Project similar to comments provided in May 2026.
	9/9/26	Mazeppa Township provided additional information regarding the extent of impact associated with a potential dam breach at the Lake Zumbro Power Dam for consideration in Project design.
	10/21/26	Mazeppa Township provided a map of the “rainy day” scenario for potential dam breach at the Lake Zumbro Power Dam.
Root River Soil and Water Conservation District	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Southwest Regional Development Commission	5/1/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)
Mississippi River Parkway Commission	5/22/26	216I Project introduction letter and route options map sent. (No response)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response)

Project Letters

The following Project letters and associated maps were submitted to the agencies identified on Table C1-2.

May 1, 2026 **VIA Email**

XXXXX

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear XX:

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The proposed Project is an approximately 140-mile-long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota (see enclosed Project Overview Map). This Project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 34-mile-long single circuit 765 kV HVTL between the existing North Rochester Substation and a point near Marion, Minnesota;

- **Segment 2:** Dairyland is developing an approximately 105-mile-long 765 kV/161 kV double circuit HVTL from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

The Project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc. (MISO) Long-Range Transmission Planning Tranche 2.1 Portfolio. The Project includes the Minnesota portions of Tranche 2.1 project number 26. Together with the rest of the Tranche 2.1 Portfolio, the Project is needed to maintain system reliability amid fundamental changes in demand for electricity, as well as the type and amount of generation that is interconnected to the grid within the MISO footprint.

For Segment 1, Xcel Energy would install four-legged, self-supporting steel lattice structures placed 1,200 to 1,400 feet apart. The height of the structures will typically be between 150 to 175 feet. Segment 1 will generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints. On Segment 2, new structures would be installed to allow both the new 765 kV circuit and existing 161 kV line to become double circuited on new structures. These structures would also consist of four-legged, self-supporting lattice structures. The structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be

150 to 199 feet tall. Segment 2 will also generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints.

Two approvals must be obtained from the Minnesota Public Utilities Commission (the Commission) before HVTLs and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants submitted an application for a Joint Certificate of Need on February 6, 2026 and plan to submit an application for a Route Permit for the Project in accordance with Minnesota Statute Chapter 216I in late 2026. As part of this process, the Applicants are undertaking agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process.

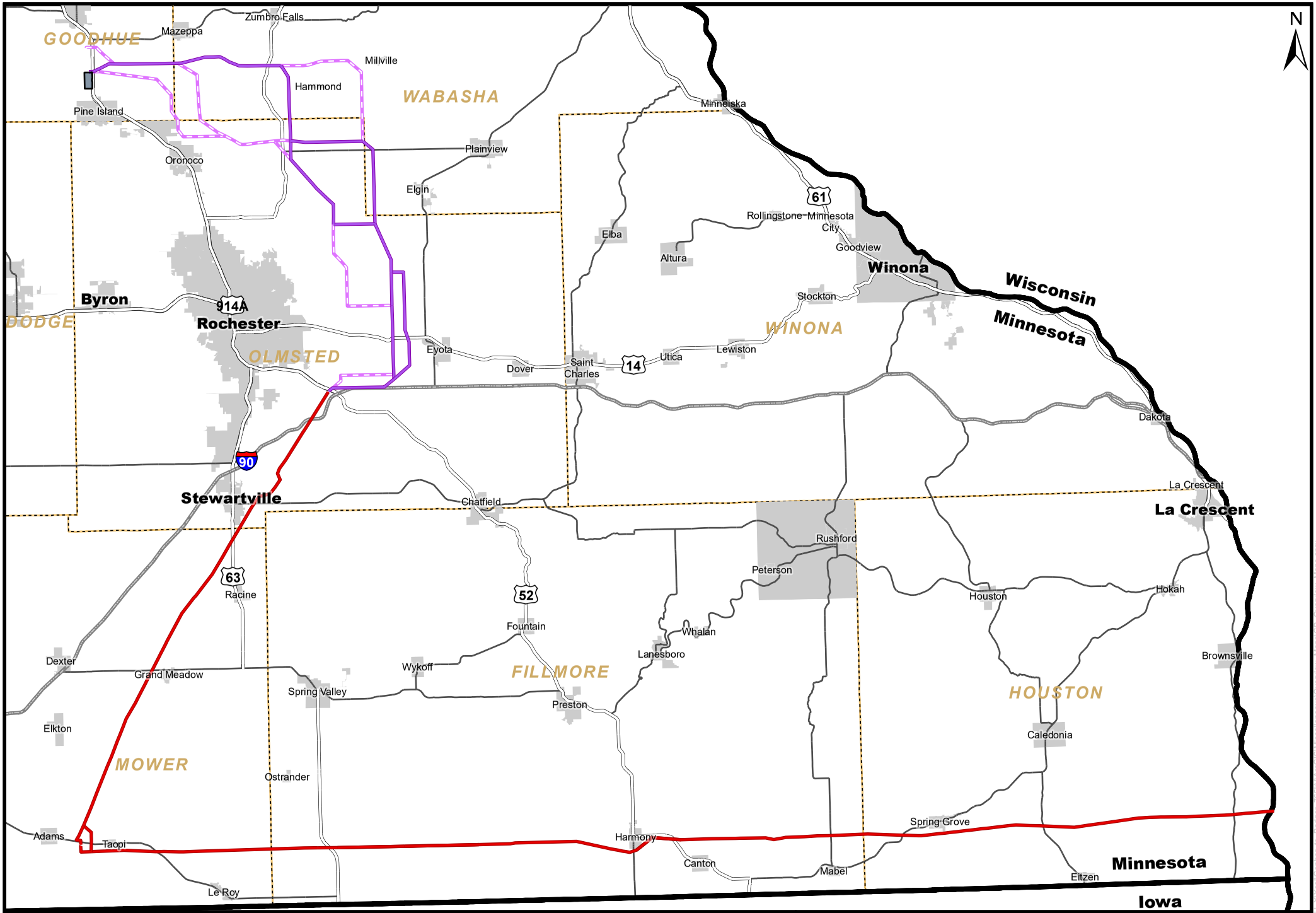
Please let us know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

Enclosure: Project Overview Map



Gopher to Badger Link

Gopher to Badger Link Project

Segment 1 Route Options
Segment 2: MariBell Segment
Previously Considered Routes
Substation Study Area
County Boundary

0 3.5 7 Miles

Date: 4/28/2026

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

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August 12, 2026 **VIA Email**

Name
Title
Department
Agency
Address
Address
Email

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear Name:

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The proposed Project is an approximately 145-mile-long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota (see enclosed Project Overview Map). This Project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 39-mile-long single circuit 765 kV HVTL between the existing North Rochester Substation and a point near Marion, Minnesota;

- **Segment 2:** Dairyland is developing an approximately 105-mile-long 765 kV/161 kV double circuit HVTL from near Marion, Minnesota, to the eastern border of Minnesota. Segment 2 also includes a new three-circuit breaker 161 kV switching station in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

- **Q-9 Reroute:** Rerouting approximately 1.2 miles of Dairyland's existing Q-9 161 kV line to connect to the proposed switching station.

The Project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc. (MISO) Long-Range Transmission Planning Tranche 2.1 Portfolio. The Project includes the Minnesota portions of Tranche 2.1 project number 26. Together with the rest of the Tranche 2.1 Portfolio, the Project is needed to maintain system reliability amid fundamental changes in demand for electricity, as well as the type and amount of generation that is interconnected to the grid within the MISO footprint.

For Segment 1, Xcel Energy would install four-legged, self-supporting steel lattice structures generally placed approximately 1,200 to 1,400 feet apart, on average. The height of the structures will typically be between 150 to 175 feet. Segment 1 will generally require an approximately 250-foot-wide right-of-way.

On Segment 2, new structures would be installed to allow both the new 765 kV circuit and existing 161 kV line to become double circuited on new structures. These structures would also consist of four-legged, self-supporting lattice structures. The structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be 150 to 199 feet tall. Segment 2 will also generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints.

Two approvals must be obtained from the Minnesota Public Utilities Commission (the Commission) before HVTLs and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants submitted an application for a Joint Certificate of Need on February 6, 2026 and plan to submit an application for a Route Permit for the Project in accordance with Minnesota Statute Chapter 216I in fall 2026. As part of this process, the Applicants are undertaking agency, tribal, and public outreach on the Project through letters, meetings, and open houses.

At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential routing constraints. The Applicants recently refined potential Project routes based on outreach conducted to date. The enclosed Project Overview Map identifies the current Proposed Route that the Applicants intend to file with the Route Permit application this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

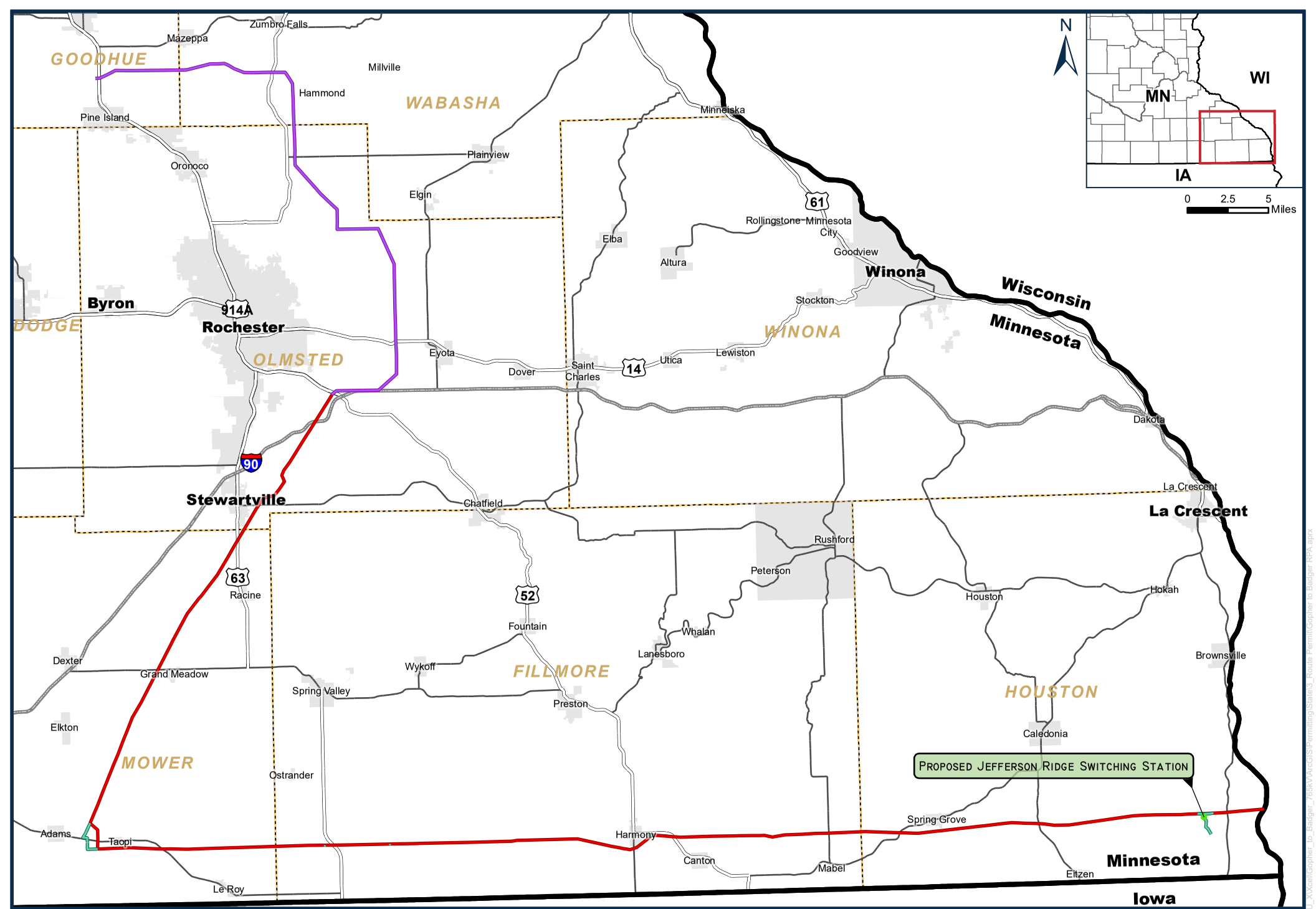
Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

Enclosure: Project Overview Map



Gopher to Badger Link

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Project Overview Map

Date: 8/3/2026

- Proposed Jefferson Ridge Switching Station
- Segment 1
- Segment 2
- Dairyland 161 kV Rebuilds (including Q-9)
- Municipality
- County Boundary

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United States Army Corps of Engineers

Outlook

MariBell Transmission project PreApp Follow-up

From Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Date Tue 1/20/2026 3:09 PM
To Eric Myers <eric.myers@swca.com>; Stephanie Strength <Stephanie.Strength@swca.com>
Cc Strahle, Trace R CIV USARMY CEMVP (USA) <Trace.R.Strahle@usace.army.mil>

Good afternoon,

I am following up on our pre-application meeting last Friday, January 16, 2026 to get the MariBell Transmission project into our database and assigned a Corps file number. To do so, I need some additional information:

1. Primary Applicant and Agent Points of Contact names and their contact information (address, email, phone numbers etc.).
2. Latitude/Longitude coordinates (in decimal degrees) where the proposed project crosses the Mississippi River
3. If readily available, project maps which show the approximate proposed route.
4. If you have any shapefiles readily available for the proposed route, they would be helpful, but are not required at this time.

Thank you,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx

Outlook

RE: Contact Email from Rob McCaskey

From Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Date Tue 3/3/2026 5:02 PM
To Eric Myers <eric.myers@swca.com>
Cc Stephanie Strength <Stephanie.Strength@swca.com>

Hi Eric-

Are you still planning on sending me an email with your specific design reference height questions so I can work on getting you an answer? I still have this open as a pre-app, but if you don't intend to send it, I will close it out.

Thanks,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx

From: Beatty, Catherine E CIV USARMY CEMVP (USA)
Sent: Tuesday, February 3, 2026 8:50 AM
To: Eric Myers <eric.myers@swca.com>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>
Subject: RE: Contact Email from Rob McCaskey

Hi Eric-

I am not clear on your ask, but I am happy to chat and see if I can assist within my regulatory capacity.

I can be available most of today, so please let me know what time you'd like to give me a call, and I can block out that time on my calendar. If today doesn't work, we can figure out another time this week.

Thanks,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx

From: Eric Myers <eric.myers@swca.com>
Sent: Wednesday, January 28, 2026 8:16 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>
Subject: [Non-DoD Source] FW: Contact Email from Rob McCaskey

Good Morning, Catherine-

I wanted to connect with you to see if there is anything I can do to move this conversation forward. Could I give you a call today?

Thanks,

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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From: Eric Myers
Sent: Thursday, January 22, 2026 12:26 PM
To: 'Mccaskey, Robert E CIV USCG (USA)' <Rob.E.McCaskey@uscg.mil>
Cc: 'Monterroza, Allan O CIV USCG D8 (USA)' <Allan.O.Monterroza@uscg.mil>; 'Catherine.E.Beatty@usace.army.mil' <Catherine.E.Beatty@usace.army.mil>; Stephanie Strength <Stephanie.Strength@SWCA.COM>; Leffler, Paul M CIV USARMY CEMVP (USA) <paul.m.leffler@usace.army.mil>; Coffield, Lucas <lucas.coffield@nexteraenergy.com>
Subject: RE: Contact Email from Rob McCaskey

Good Afternoon, Rob –

Thanks again for your help on this. Syncing up my conversation with Allan and USACE (Catherine Beatty and Paul Leffler copied here), I wanted to make sure your guidance reflects the new Lansing Bridge, as I expect the existing tables may have not been updated The old bridge was demolished just before Christmas, and the new bridge goes into service next year(Notice re: new Lansing bridge attached – thanks Allan). Does your guidance of 67.5 incorporate the new bridge design?

Thanks Rob,

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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From: Mccaskey, Robert E CIV USCG (USA) <Rob.E.McCaskey@uscg.mil>
Sent: Thursday, January 15, 2026 2:28 PM
To: Eric Myers <eric.myers@swca.com>
Subject: RE: Contact Email from Rob McCaskey

It looks like 67.5 is the highest vertical clearance near that location. Under normal circumstances, the USCG would require a new bridge to meet or exceed this clearance.
Rob

From: Mccaskey, Robert E CIV USCG (USA)
Sent: Thursday, January 15, 2026 8:14 AM
To: 'Eric.myers@swac.com' <Eric.myers@swac.com>
Subject: Contact Email from Rob McCaskey

Rob McCaskey
Heartland Coast Guard District(dwb)
1222 Spruce street
Suite 2.102D
St. Louis, MO.
63103-2832

Outlook

RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

From Eric Myers <eric.myers@swca.com>
Date Wed 3/4/2026 5:47 PM
To Catherine.E.Beatty@usace.army.mil <catherine.e.beatty@usace.army.mil>
Cc Stephanie Strength <Stephanie.Strength@swca.com>; Coffield, Lucas <lucas.coffield@nexteraenergy.com>; Michael Peters <michael.peters@dairylandpower.com>

3 attachments (2 MB)
Lansing Bridge.pdf; Mar_2026 MariBell Fact Sheet.pdf; MariBell_PoolBridge_Map.png;

Good Evening, Catherine -

Thank you for meeting with us in January and for the follow-up phone call last month. As we discussed, we've provided a fact sheet for specific project understanding and some context to other projects in the region (attached). We've also spent some time refining our question regarding clearances required over the Mississippi River and assembled some useful references.

Clearance Confirmation Request

1) Can USACE confirm that the Lansing Bridge at Mississippi River Mile (RM) 663.4 is the correct structure to govern clearance calculations (683.3 feet AMSL)? We recognize this is the mid-span clearance, not the minimum low steel level. Please let us know if this (and not 679.3 feet AMSL) is the correct reference point. – see attached USCG Public Notice D8 DWB-911

2) Per guidance under 33 CFR 322.5, the line would maintain a clearance of 728.3'AMSL based on the 683.3' AMSL reference point and the 45' clearance stipulated for765kV transmission lines. (eCFR :: 33 CFR 322.5 -- Special policies.) Is this your understanding of the appropriate calculation?

3) May we confirm the process for final determination of this clearance through consultation between USCG and USACE – have we appropriately calculated the clearance, and is there further evaluation that could change this low steel reference point?

Background
To further engineering and resource assessment, the Project requires confirmation of the necessary clearance crossing the Mississippi River. Based on the location, the height restrictions associated with the new bridge crossing from Lansing, IA to Crawford County, WI at Mississippi River Mile 663.4 (hereafter the "Lansing Bridge," aka "IA 9 Bridge" or "Black Hawk Bridge"). Design information approved by the USCG and attached indicates the lowest steel elevation for the main channel span is 679.3 feet AMSL and a mid-channel Low Steel Elevation of 683.3 feet AMSL. Please see the attached map of these locations and USCG communication regarding bridge design.

Crossing details and associated infrastructure by Mississippi River Mile (RM) :

- RM 697.5 - The closest upstream bridge is the Mississippi River Bridge (consisting of the Cass Street and Cameron Avenue Bridges)
- RM 679.2 - Genoa Dam and locks (separates Pool 8 from Pool 9)
- RM 679 - Proposed transmission line crossing, Project MariBell
- RM 663.4 - Bridge/Black Hawk Pool 9 (downstream limitation). New bridge has a low steel elevation at mid channel of height clearance 60-64' lowest steel. Existing tables for determining clearance may have not been updated, see attached design.

We recognize that we are raising this issue early in the project development process and greatly appreciate your assistance in helping us set design criteria for the project. We look forward to further conversation on this matter.

Thank you,

Eric Myers
eric.myers@swca.com

Stephanie Strength
stephanie.strength@swca.com

Outlook

RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

From Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Date Mon 3/23/2026 4:01 PM
To Eric Myers <eric.myers@swca.com>
Cc Stephanie Strength <Stephanie.Strength@swca.com>

Hi Eric-

The 2-foot correction is in line with what we were estimating as well and appears to be an appropriate adjustment. Hope that helps!

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Eric Myers <eric.myers@swca.com>
Sent: Monday, March 23, 2026 9:28 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>
Subject: [Non-DoD Source] RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good Morning, Catherine!

I hope your Monday and week are off to a great start. Sorry to keep this issue rolling-I'm trying to give my engineering partners some more guidance on clearance. Does the 2' incremental average pool allowance seem adequate for the difference between Lansing and the tailwater of Genoa?

Thanks,

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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Book time to meet with me

From: Eric Myers
Sent: Wednesday, March 18, 2026 9:57 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@SWCA.COM>; Allan.O.Monterroza@uscg.mil; rob.e.mccaskey@uscg.mil; Stephanie Strength <Stephanie.Strength@SWCA.COM>; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Thank you Catherine.

Based on gage readings available online, March 17 Elevations as follows:

3/17 Elevations:
Tailwater of Genoa Lock and Dam 8 = 623.43'
Mississippi River at Lansing, IA = 620.48'
Difference on 3/17/2026 = 2.45'

Normal Pool Elevation for Pool 8 is frequently cited 631'. With the Lift of Lock 8 cited as 10-11', that would put normal pool elevation below Lock and Dam 8 at 620' – 621'
Normal Pool Elevation for Pool 9 above Lock and Dam 9 at Lynxville, Wisconsin is Cited as 619'-620'
Normal Pool Elevation Difference 1-2'

Understanding that the Lansing Bridge is located at River Mile 670, located approximately 20 river miles above Lock and Dam 9, and Lock 8 and the proposed crossing are located 10 miles above the Lansing Bridge, it would seem reasonable that 2' would be a sufficient addition to the elevation and associated clearance calculations. Does that line up with the initial calculations you and your team did?

Thanks,

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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Book time to meet with me

From: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Sent: Tuesday, March 17, 2026 4:17 PM
To: Eric Myers <eric.myers@swca.com>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>; Allan.O.Monterroza@uscg.mil; rob.e.mccaskey@uscg.mil; Stephanie Strength <Stephanie.Strength@swca.com>; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Hi Eric,

We did a preliminary review of the water level elevations at both locations and there appears to be a sufficient enough difference that an adjustment would be needed.

Thanks,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Eric Myers <eric.myers@swca.com>
Sent: Monday, March 16, 2026 11:26 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>; Allan.O.Monterroza@uscg.mil; rob.e.mccaskey@uscg.mil; Stephanie Strength <Stephanie.Strength@swca.com>; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>
Subject: [Non-DoD Source] RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Thanks Catherine –

Since the proposed crossing and the Lansing Bridge are both in Upper Pool 9, would there still be an elevation adjustment or would the Pool Elevation be the same?

Thanks

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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Book time to meet with me

From: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Sent: Thursday, March 12, 2026 12:22 PM
To: Eric Myers <eric.myers@swca.com>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>; Allan.O.Monterroza@uscg.mil; rob.e.mccaskey@uscg.mil; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Hi Eric,

We can confirm that the Lansing Bridge is the correct reference structure for vertical clearance requirements per 33 CFR 322.5. As confirmed by the Coast Guard, the required vertical clearance for the new bridge to be 64.0 feet above the normal pool elevation. Per guidance under 33 CFR 322.5, the line would require a minimum additional clearance of 45' stipulated for 765kV transmission lines. Since the Lansing Bridge vertical clearance elevation at the center of the channel was determined based on the normal pool elevation at the existing bridge location, the proposed 765-kV line elevation would then need to be corrected for the normal pool elevation at the proposed utility crossing location. This would correct for the upstream location difference between the Lansing Bridge and proposed utility crossing. I am not aware of any further evaluation that could change the low steel reference point. Please let me know if you have any additional questions.

Sincerely,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Eric Myers <eric.myers@swca.com>
Sent: Wednesday, March 11, 2026 10:22 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@swca.com>
Subject: [Non-DoD Source] RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good Morning, Catherine –

Just following up on my note from last week. Is there anything else I can provide that would be helpful?

Thank you,

-Eric

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com

SWCA | 100% Employee OWNED

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Book time to meet with me

From: Eric Myers
Sent: Wednesday, March 4, 2026 5:47 PM
To: Catherine.E.Beatty@usace.army.mil
Cc: Stephanie Strength <Stephanie.Strength@SWCA.COM>; Coffield, Lucas <lucas.coffield@nexteraenergy.com>; Michael Peters <michael.peters@dairylandpower.com>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good Evening, Catherine -

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2) Per guidance under 33 CFR 322.5, the line would maintain a clearance of 728.3'AMSL based on the 683.3' AMSL reference point and the 45' clearance stipulated for765kV transmission lines. (eCFR :: 33 CFR 322.5 -- Special policies.) Is this your understanding of the appropriate calculation?

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- RM 679.2 - Genoa Dam and locks (separates Pool 8 from Pool 9)
- RM 679 - Proposed transmission line crossing, Project MariBell
- RM 663.4 - Bridge/Black Hawk Pool 9 (downstream limitation). New bridge has a low steel elevation at mid channel of height clearance 60-64' lowest steel. Existing tables for determining clearance may have not been updated, see attached design.

We recognize that we are raising this issue early in the project development process and greatly appreciate your assistance in helping us set design criteria for the project. We look forward to further conversation on this matter.

Thank you,

Eric Myers
eric.myers@swca.com

Stephanie Strength
stephanie.strength@swca.com

U.S. Department of Homeland Security
United States Coast Guard

Commander
Eighth Coast Guard District

1222 Spruce Street, Room 2.102D
St. Louis, MO 63103-2832
Staff Symbol: dwb
Phone: (314) 269-2378
Email: Eric.Washburn@uscg.mil

June 23, 2023

PUBLIC NOTICE D8 DWB-911

All interested parties are herein notified that the Commander, Eighth Coast Guard District, has received application materials dated May 19, 2023 from the Iowa Department of Transportation for approval of location and plans for the construction of a bridge over a navigable waterway of the United States.

WATERWAY AND LOCATION: Upper Mississippi River, Mile 663.4, on Iowa 9 between Lansing, Allamakee County, IA and Crawford County, WI.

CHARACTER OF WORK: Replace a fixed steel-truss highway bridge with a fixed steel through-truss highway bridge. The new bridge replaces a structurally deficient bridge which will be removed.

MINIMUM NAVIGATIONAL CLEARANCES:

	Existing	Proposed
Horizontal:	Main channel span is 640.0 feet measured normal to axis of the channel.	Main channel span is 764.5 feet measured normal to axis of the channel.
Vertical:	Main channel span low steel elevation is 686.8 feet. Normal pool elevation is 619.3 for a total of 67.5 feet vertical clearance.	Main channel span low steel elevation is 679.3 feet. Normal pool elevation is 619.3 for a total of 60.0 feet vertical clearance at left and right descending piers, 64.0 feet vertical clearance at center of channel.

Datum: NAVD88

ENVIRONMENTAL CONSIDERATIONS:

The Federal Highway Administration (FWHA) is the lead Federal agency for satisfying the requirements of the National Environmental Policy Act (NEPA). The FHWA is acting on behalf of the U.S. Coast Guard for all environmental control laws. An Environmental Assessment/Finding of No Significant Impact (EA/FONSI) was issued on November 1, 2022 pursuant to NEPA, as amended. The U.S. Coast Guard has tentatively determined that the proposed action will not have a significant impact for the purposes of NEPA and plans to issue a

EA/FONSI for the project. Documents are available for review at the above address, Monday through Friday, 8:00 a.m. to 4:00 p.m.

A water quality certification in accordance with Section 401 of the Clean Water Act, as amended, for this project was issued from Wisconsin Department of Natural Resources and Iowa Department of Natural Resources on June 13, 2023. The bridge is located in the floodplain. The 100-year flood elevation is 632.6 feet, while elevation of the low member of the navigation span is 679.3. Elevations are referenced to NAVD88 datum. The total impacted acres of wetland is .50 acres.

The decision as to whether to grant approval of the location and plans for the proposed action rests primarily upon the effect it has on navigation.

SOLICITATION OF COMMENTS:

Mariners are requested to comment on the proposed navigation clearances, placement of a bridge protective system and other navigational safety issues, including need for clearance gauges and extent of nighttime navigation to determine the need for bridge lighting. Interested parties are requested to express their views, in writing, on the proposed bridge project including its possible impacts to navigation.

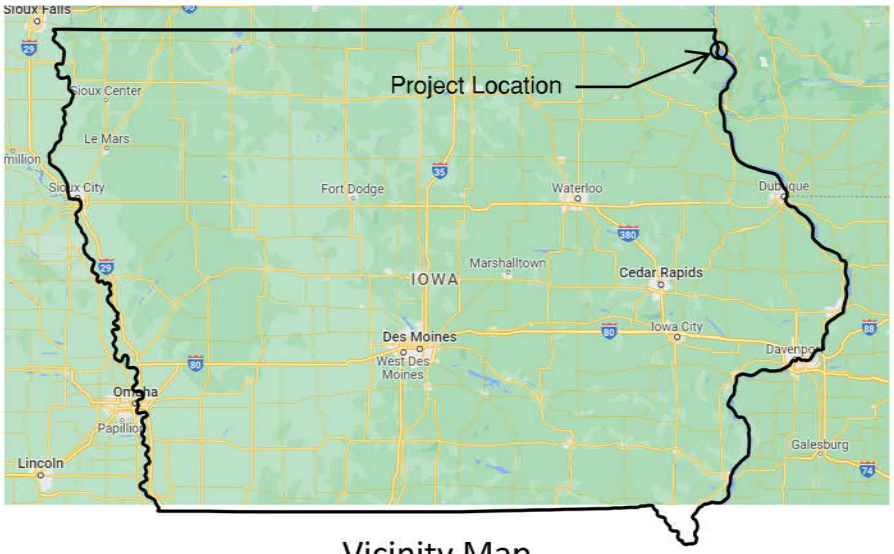
We will forward comments of an environmental nature such as those regarding wildlife refuges, public parks, historic sites, wetlands, floodplain issues, air, water quality, environmental justice, etc. to the FHWA. Comments will be received for the record at the address noted in the header or via email eric.washburn@uscg.mil through **July 24, 2023**.

Map of location and plans attached.

ERIC A. WASHBURN
Bridge Supervisor, Western Rivers
By direction of the District Commander

NOTE: The mailing list for this Public Notice is arranged by watershed. Due to the size of this list, selective mailing is not practical. Please discard notices that are not of interest to you. If you have no need for any of these notices, please advise us so that your name can be removed from the mailing list.

POSTMASTER: Official business. Please post.



Vicinity Map

N



Location Map



LICENSED PROFESSIONAL ENGINEER
Gregory T. Hasbrouck
22905
IOWA

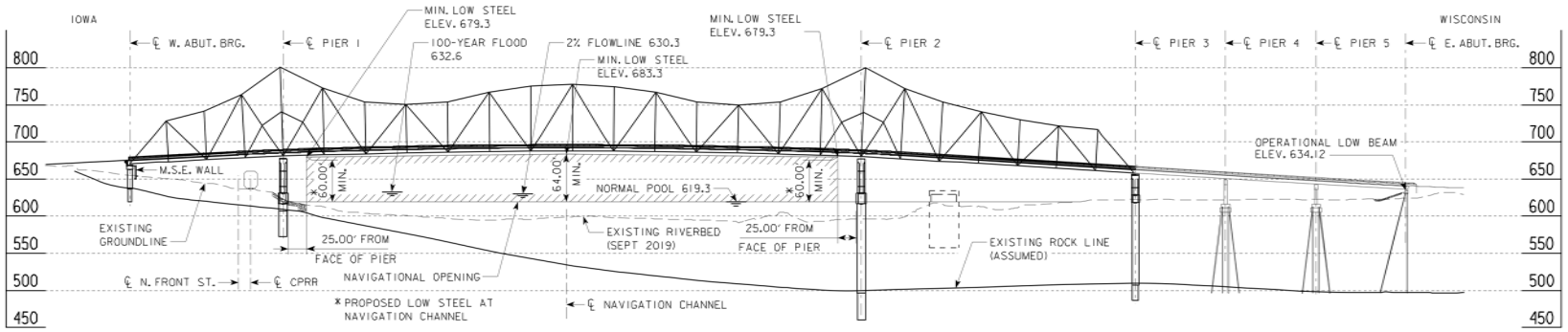
06/08/23

CONCEPTUAL PLANS UTILLIZED TO OBTAIN COAST GUARD BRIDGE PERMIT.

IA 9 BRIDGE (ALSO KNOWN AS BLACK HAWK BRIDGE)
OVER THE MISSISSIPPI RIVER, RM 663.40
AT CITY OF LANSING, ALLAMAKEE COUNTY, IOWA AND
CRAWFORD COUNTY, WISCONSIN

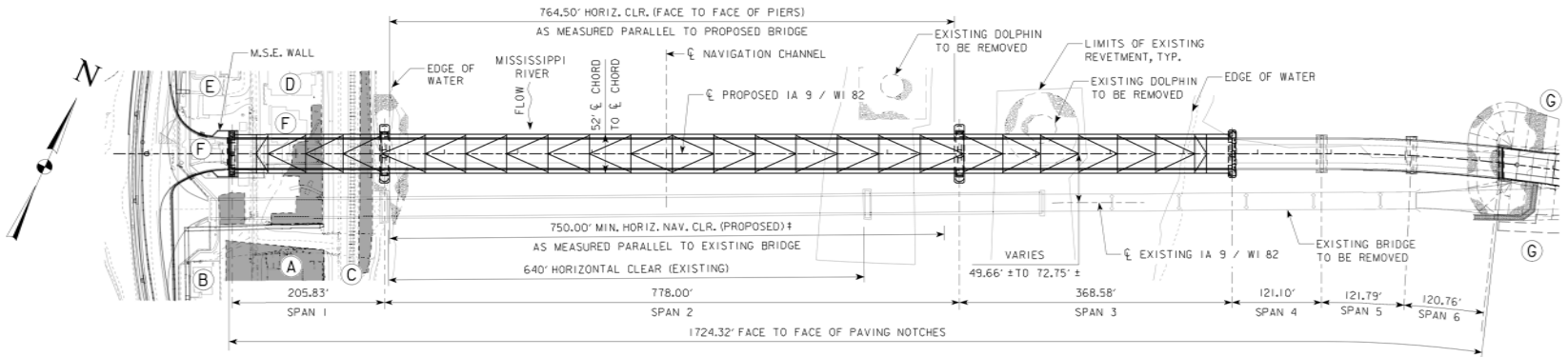
APPLICATION BY
IOWA DEPARTMENT OF TRANSPORTATION
AGENT: JIM D. ELLIS, P.E.

05/19/2023



‡ HORIZ. CLR. FOR NAVIGATION BEGINS WHERE IOWA BANK MEETS NORMAL POOL ELEV. 619.3

ELEVATION
(LOOKING UPSTREAM)



PLAN

0 40 80
SCALE IN FEET

(A) MONTE S. & MOLLIE W. MARTI
(B) MAYNARD JOHNSON
(C) DAKOTA, MINNESOTA, & EASTERN RAILROAD CORPORATION DBA CANADIAN PACIFIC
(D) JAMES RUSSELL FENNERTY - TRUSTEE
(E) PATRICIA WENNES KOBRIGER
(F) IOWA DOT (ACQUISITION PENDING)
(G) USA (US GOVERMENT)

PLAN NOTE:
VERTICAL DATUM NAVD 88.
NAVD 88 = MSL 1912 - 0.7'

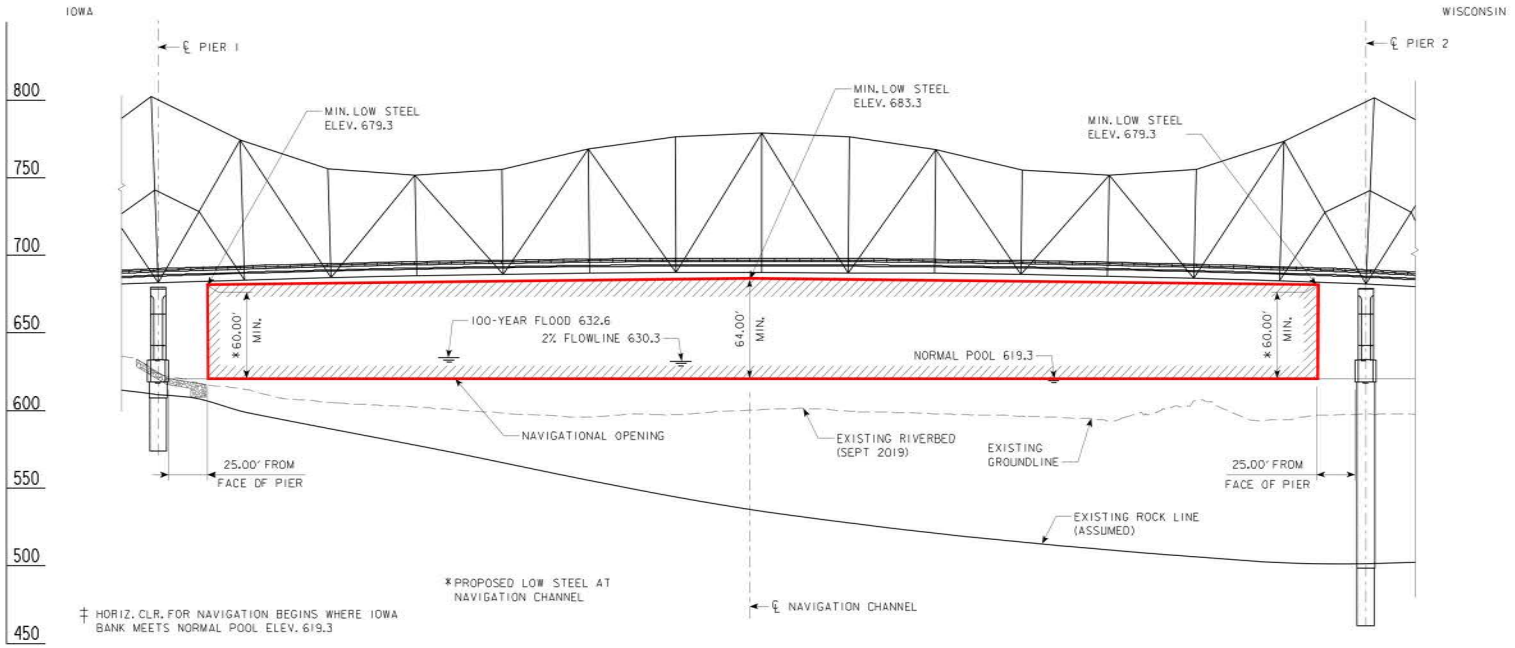
LICENSED PROFESSIONAL ENGINEER
Gregory T. Hasbrouck
22905
IOWA

06/08/23

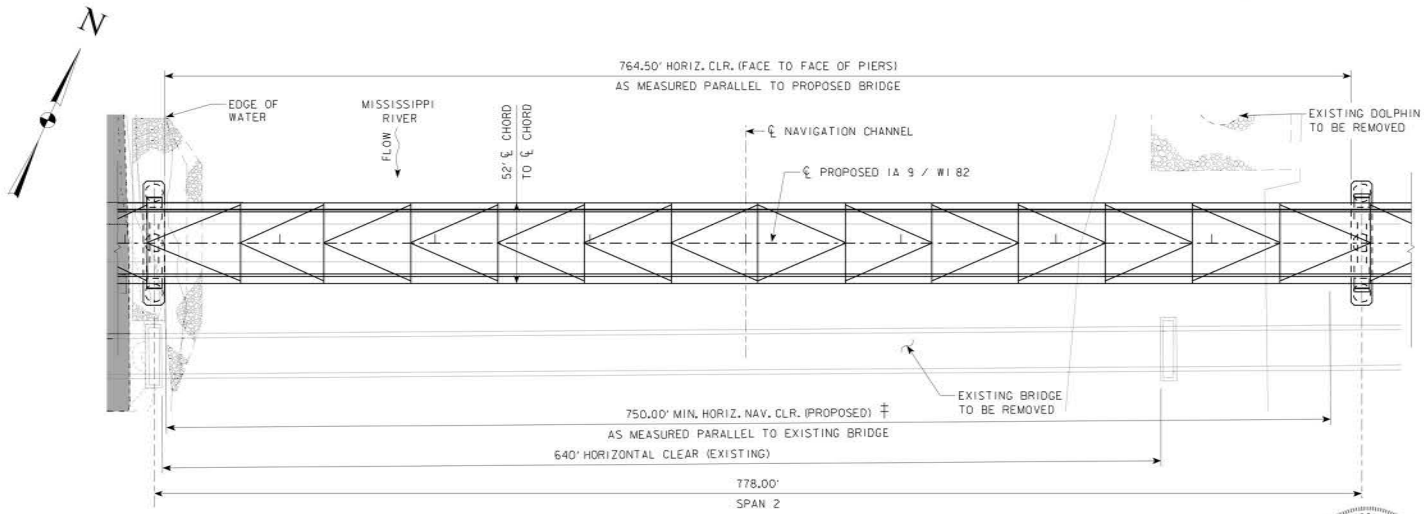
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AT CITY OF LANSING, ALLAMAKEE COUNTY, IOWA AND
CRAWFORD COUNTY, WISCONSIN

APPLICATION BY
IOWA DEPARTMENT OF TRANSPORTATION
AGENT: JIM D. ELLIS, P.E.



ELEVATION
(LOOKING UPSTREAM)



PLAN
0 20 40
SCALE IN FEET

PLAN NOTE:
VERTICAL DATUM NAVD 88.
NAVD 88 = MSL 1912 - 0.7'

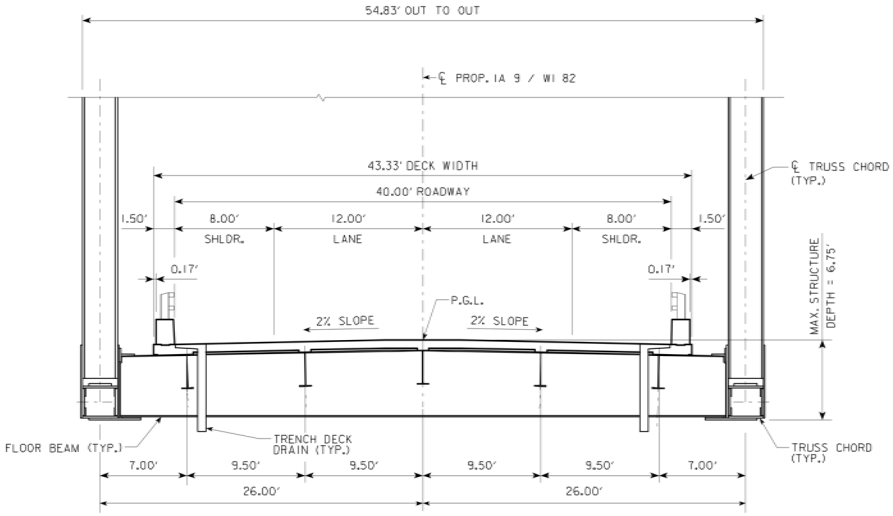
LICENSED PROFESSIONAL ENGINEER
Gregory T. Hasbrouck
22905
IOWA

06/08/23

CONCEPTUAL PLANS UTILLIZED TO OBTAIN COAST GUARD BRIDGE PERMIT.

IA 9 BRIDGE (ALSO KNOWN AS BLACK HAWK BRIDGE)
OVER THE MISSISSIPPI RIVER, RM 663.40
AT CITY OF LANSING, ALLAMAKEE COUNTY, IOWA AND
CRAWFORD COUNTY, WISCONSIN

APPLICATION BY
IOWA DEPARTMENT OF TRANSPORTATION
AGENT: JIM D. ELLIS, P.E.



TYPICAL TRUSS SECTION AT NAVIGATION CHANNEL
(LOOKING UPSTATION)

0 2.5 5
SCALE IN FEET

LICENSED PROFESSIONAL ENGINEER
Gregory T. Hasbrouck
22905
IOWA

06/08/23

CONCEPTUAL PLANS UTILLIZED TO OBTAIN COAST GUARD BRIDGE PERMIT.

IA 9 BRIDGE (ALSO KNOWN AS BLACK HAWK BRIDGE)
OVER THE MISSISSIPPI RIVER, RM 663.40
AT CITY OF LANSING, ALLAMAKEE COUNTY, IOWA AND
CRAWFORD COUNTY, WISCONSIN

APPLICATION BY
IOWA DEPARTMENT OF TRANSPORTATION
AGENT: JIM D. ELLIS, P.E.

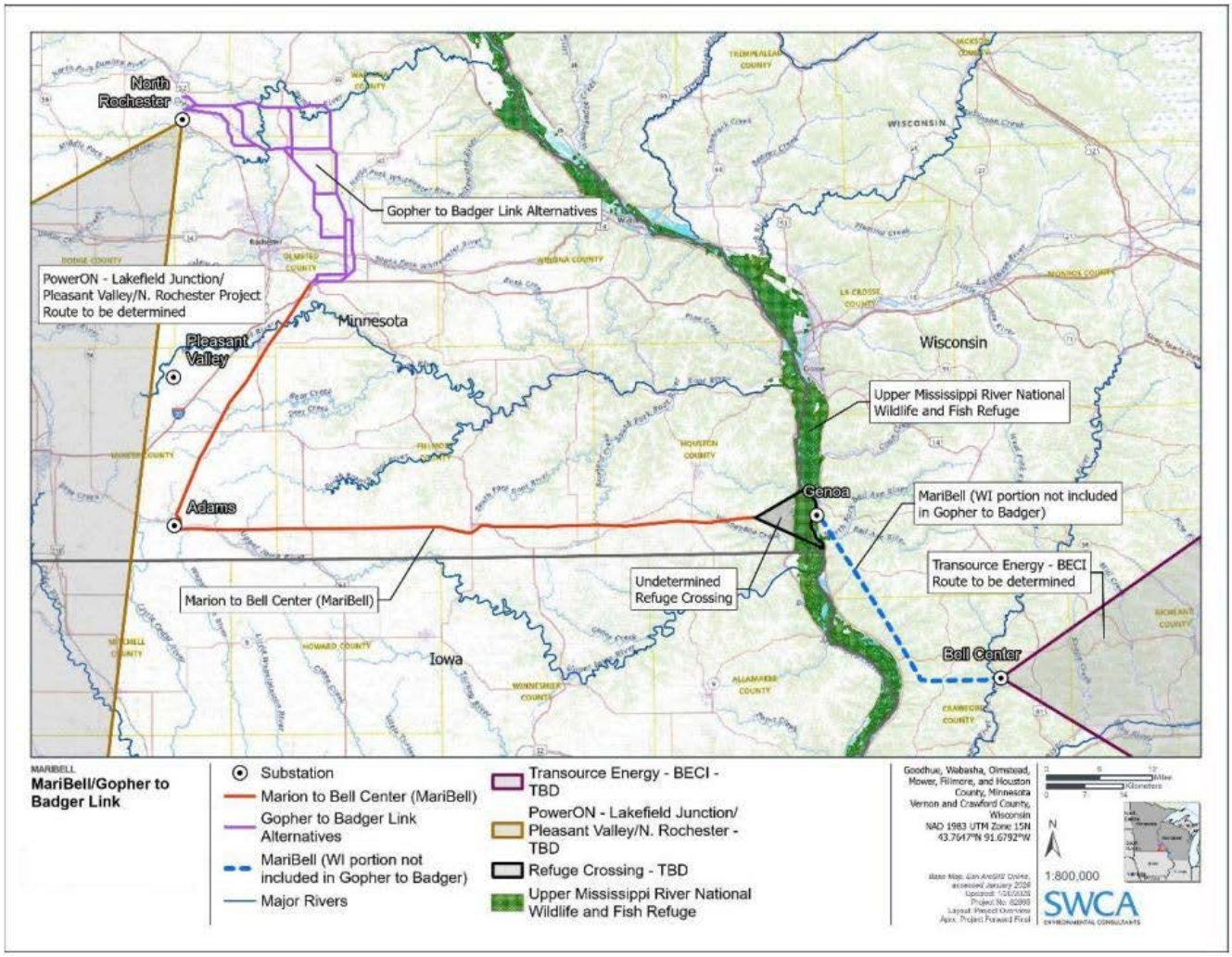
05/19/2023

DAIRYLAND POWER COOPERATIVE
A Touchstone Energy® Cooperative

GridLiance HEARTLAND

AGENCY PROJECT FACT SHEET

MariBell 765/161 kV Transmission Line Project
Parallel Federal and State Processes (Minnesota and Wisconsin)



AGENCY PROJECT FACT SHEET

Name:	**MariBell 765/161 kV Transmission Line Project (MariBell Project or Project)***
Related Project Names*	**Minnesota-Wisconsin Reliability Link - (Dairyland Power Cooperative [DPC] and GridLiance**) – Previous (historical) name of the MariBell Project. **Gopher to Badger Link - (Xcel Energy, GridLiance, and DPC)** – 765 kilovolt (kV) project in Minnesota stretching from North Rochester to the Minnesota–Wisconsin state line. The section from Marion, Minnesota, to the Minnesota/Wisconsin state line overlaps the Minnesota portion of the MariBell Project. . **PowerOn Midwest** – **(Xcel Energy, ITC and Great River Energy)** – 765 kV project connecting Lakefield Junction, Minnesota to North Rochester, Minnesota. **BECI (Bell Center – Columbia – Sugar Creek – IL/WI State Line) - (Transource) –** A separate 765 kV project consisting of three 765 kV transmission line facilities in Wisconsin extending from Bell Center, Wisconsin to Columbia, Wisconsin, and southwest to the Illinois/Wisconsin state line.
Location	The MariBell project extends from **Marion, Minnesota**, across the driftless region and the Mississippi River to an interconnection point near **Bell Center, Wisconsin**, and proposes to **rebuild and co-locate an existing 161 kV DPC transmission line** with a new 765-kV line **using the existing right-of-way (ROW).**
U.S. Fish and Wildlife (USFWS) Refuge	Upper Mississippi River National Wildlife and Fish Refuge – Co-location with existing 161 kV lines at Genoa/Reno Bottoms and on easement managed lands in the McGregor District.
Counties (MariBell Project)	**Minnesota** – Olmsted, Mower, Fillmore, and Houston **Wisconsin** – Vernon and Crawford
Project Components	**Minnesota –** MariBell (GridLiance and DPC) – Approximately 105 miles of 765 kV/161 kV double-circuit high-voltage transmission line between Marion, Minnesota, and the Minnesota/Wisconsin state line. Applicants propose the use of four-legged self-supporting lattice structures. Generally, the structures will be placed 1,200 to 1,500 feet apart and will typically be 150 to 199 feet in height and located on a ROW of up to ~250 feet in width. **In the vicinity of the Mississippi River crossing the existing easement is 200 feet, and the structure design/height/ROW width will be determined through agency and resource considerations.** **Wisconsin –** MariBell (GridLiance and DPC) – This segment consists of approximately 32 miles of 765 kV/161 kV double-circuit high-voltage transmission line between the Mississippi River crossing and Bell Center, Wisconsin. Minnesota/Wisconsin state line. Applicants propose the use of four-legged self-supporting lattice structures. Generally, the structures will be placed 1,200 to 1,500 feet apart and will typically be 150 to 199 feet in height and located on a ROW of up to ~250 feet in width. **In the vicinity of the Mississippi River crossing the existing easement is 200 feet, and the structure design/height/ROW width will be determined through agency and resource considerations.**
Project Purpose	This project is part of a larger effort by **MISO to maintain a resilient, reliable and flexible electric grid**.

AGENCY PROJECT FACT SHEET

Status

- Voluntary public meetings underway in both Minnesota and Wisconsin
- Certificate of Need application filing in Minnesota in February 2026
- Minnesota Route Permit and Wisconsin Certificate of Public Convenience and Necessity (CPCN) application filings expected in late 2026
- Pre-application meetings have begun with Upper Mississippi River National Wildlife and Fish Refuge
- Initial voluntary outreach via written correspondence to several Tribes with ancestral connections to the project area was performed in December 2025. This voluntary outreach and engagement effort is not intended to replace formal government-to-government consultation.

Tribes contacted for initial voluntary outreach
Northern Arapaho Tribe
Fort Peck Assiniboine & Sioux Tribes
Bad River Band of Lake Superior Chippewa Tribe
Cheyenne and Arapaho Tribes
Cheyenne River Sioux Tribe
Chippewa Cree Tribe
Flandreau Santee Sioux Tribe
Forest County Potawatomi
Fort Belknap Indian Community
Ho-Chunk Nation
Iowa Tribe of Kansas & Nebraska
Lac Courte Oreilles Band of Lake Superior Chippewa Indians
Lac du Flambeau Band of Lake Superior Chippewa Indians
Lac Vieux Desert Band of Lake Superior Chippewa Indians
Lower Sioux Indian Community
Gun Lake Tribe
Menominee Indian Tribe
Miami Tribe of Oklahoma
Bois Forte Band of Chippewa
Fond du Lac Band of Lake Superior Chippewa
Grand Portage Band of Chippewa
Leech Lake Band of Ojibwe
Mille Lacs Band of Ojibwe
White Earth Nation
Northern Cheyenne Tribe
Omaha Tribe of Nebraska
Onieda Nation

Otoe-Missouria Tribe
Prairie Island Indian Community
Red Cliff Band of Lake Superior Chippewa Indians
Red Lake Nation
Rosebud Sioux Tribe
Meskwaki Nation
Saginaw Chippewa Tribe
Santee Sioux Nation
Shakopee Mdewakanton Sioux Community
Sisseton Wahpeton Oyate
Sokaogon Chippewa Community
Spirit Lake Tribe
St. Croix Chippewa Indians
Standing Rock Sioux Tribe
Stockbridge-Munsee Community
Mandan, Hidatsa, and Arikara Nation
Turtle Mountain Band of Chippewa Indians
Upper Sioux Community
Winnebago Tribe of Nebraska
Yankton Sioux Tribe

Outlook

Re: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

From Laura Klewicki <laura.klewicki@swca.com>
Date Mon 10/5/2026 2:35 PM
To Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>; Eric Myers <eric.myers@swca.com>
Cc Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>; Strahle, Trace R CIV USARMY CEMVP (USA) <Trace.R.Strahle@usace.army.mil>

Hi Catherine,

Thank you very much for providing these options. The Friday slot will work great. I'll circulate an invite.

Best Regards,
Laura

Laura Klewicki
P +1.630.705.1762 | C +1.919.924.2349
laura.klewicki@swca.com

From: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Sent: Monday, October 5, 2026 11:34 AM
To: Laura Klewicki <laura.klewicki@swca.com>; Eric Myers <eric.myers@swca.com>
Cc: Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>; Strahle, Trace R CIV USARMY CEMVP (USA) <Trace.R.Strahle@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good morning Laura and Eric,

Based on our current calendars, the following timeframes are presently showing as available for a meeting:

Tuesday 10/6- 1500-1600
Thursday 10/8- 1500-1600
Friday 10/9- 0900-1100

Please let us know which of these times works best for both of you or if we need to investigate sometime next week.

Thank you,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Laura Klewicki <laura.klewicki@swca.com>
Sent: Wednesday, September 23, 2026 10:07 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>; Eric Myers <eric.myers@swca.com>
Cc: Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>; Strahle, Trace R CIV USARMY CEMVP (USA) <Trace.R.Strahle@usace.army.mil>
Subject: [Non-DoD Source] Re: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Hi Catherine,

Jumping in here as Eric is at a conference this week. Apologies we couldn't make it yesterday, and I've got a conflict tomorrow. Could you send us times you, Paul, and Trace are available over the next couple of weeks (except 9/30)?

I look forward to meeting you and the rest of the team.

Best Regards,
Laura

Laura Klewicki
P +1.630.705.1762 | C +1.919.924.2349
laura.klewicki@swca.com

From: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Sent: Tuesday, September 22, 2026 10:59 AM
To: Eric Myers <eric.myers@swca.com>
Cc: Laura Klewicki <laura.klewicki@swca.com>; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>; Strahle, Trace R CIV USARMY CEMVP (USA) <Trace.R.Strahle@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Hi Eric,

Currently, we are available today (Tuesday 9/22) from 1-2pm or Thursday (9/24) from 1-2pm. Please include Paul Leffler (Paul.M.Leffler@usace.army.mil) on the meeting invite as well. If you have updates for the WI portion of the project, please also include Trace Strahle (Trace.R.Strahle@usace.army.mil).

Thank you,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Eric Myers <eric.myers@swca.com>
Sent: Monday, September 21, 2026 10:19 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Laura Klewicki <laura.klewicki@swca.com>
Subject: [Non-DoD Source] RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Wonderful!

Thanks Catherine – looking forward to catching up.

-E

Eric Myers
Vice President – Strategic Growth

SWCA Environmental Consultants
262.422.1831
Eric.Myers@swca.com



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Book time to meet with me

From: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Sent: Monday, September 21, 2026 10:16 AM
To: Eric Myers <eric.myers@swca.com>
Cc: Laura Klewicki <laura.klewicki@swca.com>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

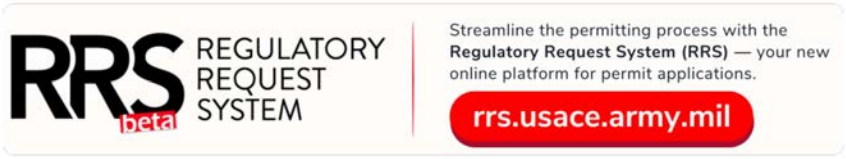
Hi Eric-

Thank you for reaching out. I am currently coordinating schedules with my team and will follow up with some suitable times for us to meet as soon as I get that ironed out.

Thanks,

Catherine Beatty
Regulatory Project Manager
U.S. Army Corps of Engineers – St. Paul District
Phone: 612-258-3504

https://www.mvp.usace.army.mil/Missions/Regulatory.aspx



From: Eric Myers <eric.myers@swca.com>
Sent: Monday, September 21, 2026 7:51 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Laura Klewicki <laura.klewicki@swca.com>
Subject: [Non-DoD Source] RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good Morning, Catherine –

I hope your week is off to a good start! Wanted to bump this to the top of your in box. Any chance we could connect this week so Laura and I could provide a project update?

Thanks,

-Eric

Eric Myers
Vice President – Strategic Growth

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Book time to meet with me

From: Eric Myers
Sent: Tuesday, September 15, 2026 2:31 PM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <catherine.e.beatty@usace.army.mil>
Cc: Laura Klewicki <laura.klewicki@swca.com>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Good Afternoon, Catherine!

I hope this note finds you well, and that you had an amazing summer! Hard to believe we last spoke in the spring. I wanted to refresh our conversation and provide you some project updates. I also wanted to introduce Laura Klewicki who has since joined our team and from whom you might be hearing in the future (in addition to Stephanie and me).

We'd love to set up a time to provide an update over Teams. In the meantime, I'm also doing some research on the USACE's participation in the Upper Mississippi River Restoration Plan. Do you have a colleague you could refer me to that might be able to help me get up the curve?

Thanks,

-Eric

Eric Myers
Vice President – Strategic Growth

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262.422.1831
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Book time to meet with me

From: Eric Myers
Sent: Wednesday, March 18, 2026 9:57 AM
To: Beatty, Catherine E CIV USARMY CEMVP (USA) <Catherine.E.Beatty@usace.army.mil>
Cc: Stephanie Strength <Stephanie.Strength@SWCA.COM>; Allan.O.Monterroza@uscg.mil; rob.e.mccaskey@uscg.mil; Stephanie Strength <Stephanie.Strength@SWCA.COM>; Leffler, Paul M CIV USARMY CEMVP (USA) <Paul.M.Leffler@usace.army.mil>
Subject: RE: File # MVP-2026-00083/CB MariBell Follow-up Bridge Height and Fact Sheet

Thank you Catherine.

Based on gage readings available online, March 17 Elevations as follows:

3/17 Elevations:
Tailwater of Genoa Lock and Dam 8 = 623.43'
Mississippi River at Lansing, IA = 620.48'
Difference on 3/17/2026 = 2.45'

Normal Pool Elevation for Pool 8 is frequently cited 631'. With the Lift of Lock 8 cited as 10-11', that would put normal pool elevation below Lock and Dam 8 at 620' – 621'
Normal Pool Elevation for Pool 9 above Lock and Dam 9 at Lynxville, Wisconsin is Cited as 619'-620'
Normal Pool Elevation Difference 1-2'

United States Fish and Wildlife Service

From: Twin Cities, FW3
To: Kristin Lenz
Subject: EXTERNAL: Automatic reply: [EXTERNAL] Gopher to Badger Link Project Introduction - Route Options
Date: Friday, May 1, 2026 4:29:07 PM

CAUTION: This email originated from outside of Merjent.

Thank you for contacting the U.S. Fish and Wildlife Service's Minnesota-Wisconsin Ecological Services Field Office.

See below for information and instructions specific to your inquiry.

Information on Federal Trust Resources

For general information about federal trust resources in Minnesota and Wisconsin, including federally listed species, please visit our Minnesota-Wisconsin Field Office website. The site has helpful information about species, habitats, and the programs administered by the U.S. Fish and Wildlife Service.

Consultation Technical Assistance

If you are requesting technical assistance with an environmental review specifically concerning threatened and endangered species under the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531-1544), we provide technical assistance through our Information for Planning and Consultation (IPaC) system. You can access the information you're looking for regarding federally listed species that could occur in your project area through IPaC by entering the geographic and activity details for your project. The system will generate an Official Species List that provides a list of federally listed species and designated critical habitat that may be impacted by your project. The species list also will include any species proposed for listing and any areas proposed as critical habitat that overlap with the project area.

Once you have reviewed the Official Species List, 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. Likewise, if there is no habitat for the species that IPaC indicates, then the appropriate determination is **No Effect**. 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 Bat

The Minnesota-Wisconsin D-key does not include the northern long-eared bat. If the northern long-eared bat appears on the user's species list, the federal project user will instead be directed to either the Northern Long-eared Bat and Tricolored Bat Range-wide 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 these tools and the new range-wide D-key is available on the Service's northern long-eared bat website.

We released the final tools and guidance documents on October 23, 2024. At that time the final tools and guidance documents replaced the NLEB's interim products; however, the NLEB Interim Consultation Framework was still valid for use by federal agencies through November 30, 2024. For federal agency projects not completed by November 30, 2024 that previously were issued streamlined biological opinions for NLEB under the Interim Consultation Framework, a memorandum (memo) was released with recommended next steps for these projects. This memo states that agencies that have not completed their projects by November 30, 2024 do not need to contact the Service if the only change to their project is that it will continue after November 30, 2024. It also outlines the process to follow if reinitiation is needed based on reinitiation criteria described at 50 CFR 402.16, such as exceeding the amount of take. This memorandum can be be found on the Service's northern long-eared bat website.

Consultation Next Steps

After reviewing the species list and applicable links, if you determine that further consultation is required with the Service (i.e., your project "May Affect" listed species or critical habitat), please contact our office for further assistance. If your agency has a designated point-of-contact (POC) in the Minnesota-Wisconsin Field Office, you may send your inquiry directly to the POC.

***Please include the IPaC consultation code in the e-mail subject line when emailing us for further coordination. Please also include a copy of your output letter in your correspondence with our office as it will help expedite our review of your project.**

Other Questions and Inquiries

All other questions and inquiries will be reviewed and either a response will be provided, or the inquiry will be directed to the appropriate U.S. Fish and Wildlife Service, or partner agency contact for response.

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) 256-7289

In Reply Refer To: 08/05/2026 18:34:16 UTC
Project Code: 2026-0104431
Project Name: Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

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 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.

For projects that intersect with or are adjacent to Tribal lands: The Service has federal Trust responsibilities and a strong commitment to working with Tribal governments to help sustain fish and wildlife resources for future generations.?Tribal governments should be provided with sufficient opportunity to express their perspectives and/or concerns for proposed projects.?If your project intersects with Tribal lands or impacts culturally sensitive resources, please engage with the federally recognized Tribe to ensure they have an opportunity to provide input on this project.

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 ≥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 A 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 northern long-eared bat and tricolored bat range-wide 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 helps 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

Wisconsin
Wisconsin Department of Natural Resources - Endangered Resources Review Homepage
Email: 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) 256-7289

PROJECT SUMMARY

Project Code: 2026-0104431

Project Name: Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

Project Type: Transmission Line - New Constr - Above Ground

Project Description: The Project will be part of a 765 kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of two segments:

Segment 1: A single-circuit 765 kV high voltage transmission line between the existing North Rochester Substation and a point near Marion, Minnesota;

Segment 2: A 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@43.890113,-92.41188807963397,14z



Counties: Minnesota and Wisconsin

ENDANGERED SPECIES ACT SPECIES

There is a total of 12 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[1], 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.

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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.

MAMMALS

NAME	STATUS
Northern Long-Eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Whooping crane *Grus americana* Population: Eastern Migratory NEP - U.S.A. (AL, AR, FL, GA, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, OH, SC, TN, VA, WI, WV) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

CLAMS

NAME	STATUS
Higgins eye (pearlymussel) *Lampsilis higginsii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5428	Endangered
Salamander mussel *Simpsonaias ambigua* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6208	Proposed Endangered
Sheepnose Mussel *Plethobasus cyphyus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6903	Endangered

INSECTS

NAME	STATUS
Monarch butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Rusty patched bumble bee *Bombus affinis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9383 General project design guidelines: https://ipac.ecosphere.fws.gov/project/KXIPHOFRKNDVZABBZPMHR2HJUM/documents/generated/12949.pdf	Endangered

NAME	STATUS
Western regal fritillary *Argynnis idalia occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Leedy's roseroot *Rhodiola integrifolia ssp. leedyi* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/285	Threatened
Prairie bush-clover *Lespedeza leptostachya* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4458	Threatened
Western prairie fringed Orchid *Platanthera praeclara* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1669	Threatened

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.

The following FWS National Wildlife Refuge Lands and Fish Hatcheries lie fully or partially within your project area:

FACILITY NAME	ACRES
FILLMORE FSA https://www.fws.gov/our-facilities?$keywords="%5C%22FILLMORE+FSA%5C%22"	88,552.505

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts

activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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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 Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* 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. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31

NAME	BREEDING SEASON
Golden Eagle *Aquila chrysaetos* 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. https://ecos.fws.gov/ecp/species/1680	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.

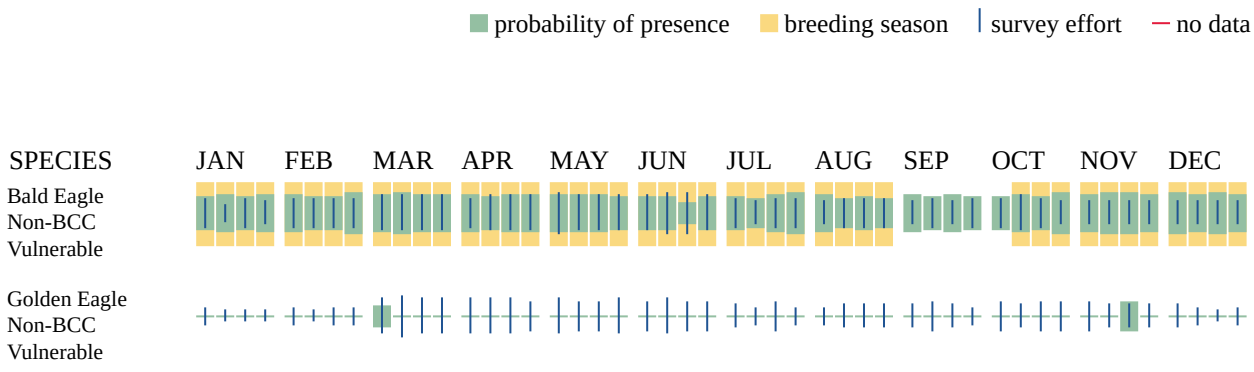
Probability of Presence (▪)

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.



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 avoidance and minimization 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

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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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
American Golden-Plover *Pluvialis dominica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere
Bald Eagle *Haliaeetus leucocephalus* 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. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31
Black Tern *Chlidonias niger surinamenisis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20
Black-billed Cuckoo *Coccyzus erythropthalmus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10

NAME	BREEDING SEASON
Bobolink *Dolichonyx oryzivorus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
Canada Warbler *Cardellina canadensis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9643	Breeds May 20 to Aug 10
Cerulean Warbler *Setophaga cerulea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974	Breeds Apr 21 to Jul 20
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Eastern Whip-poor-will *Antrostomus vociferus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10678	Breeds May 1 to Aug 20
Golden Eagle *Aquila chrysaetos* 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. https://ecos.fws.gov/ecp/species/1680	Breeds elsewhere
Golden-winged warbler *Vermivora chrysoptera* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745	Breeds May 1 to Jul 20
Grasshopper Sparrow *Ammodramus savannarum perpallidus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Henslow's Sparrow *Centronyx henslowii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
Hudsonian Godwit *Limosa haemastica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9482	Breeds elsewhere

NAME	BREEDING SEASON
Le Conte's Sparrow *Ammospiza leconteii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9469	Breeds Jun 1 to Aug 15
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Long-eared Owl *asio otus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3631	Breeds Mar 1 to Jul 15
Marbled Godwit *Limosa fedoa* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds May 1 to Jul 31
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Prairie Loggerhead Shrike *Lanius ludovicianus excubitorides* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8833	Breeds Feb 1 to Jul 31
Prothonotary Warbler *Protonotaria citrea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9439	Breeds Apr 1 to Jul 31
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Ruddy Turnstone *Arenaria interpres morinella* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/10633	Breeds elsewhere
Rusty Blackbird *Euphagus carolinus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9478	Breeds elsewhere

NAME	BREEDING SEASON
Semipalmated Sandpiper *Calidris pusilla* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9603	Breeds elsewhere
Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Upland Sandpiper *Bartramia longicauda* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9294	Breeds May 1 to Aug 31
Western Grebe *Aechmophorus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Wood Thrush *Hylocichla mustelina* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9431	Breeds May 10 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.

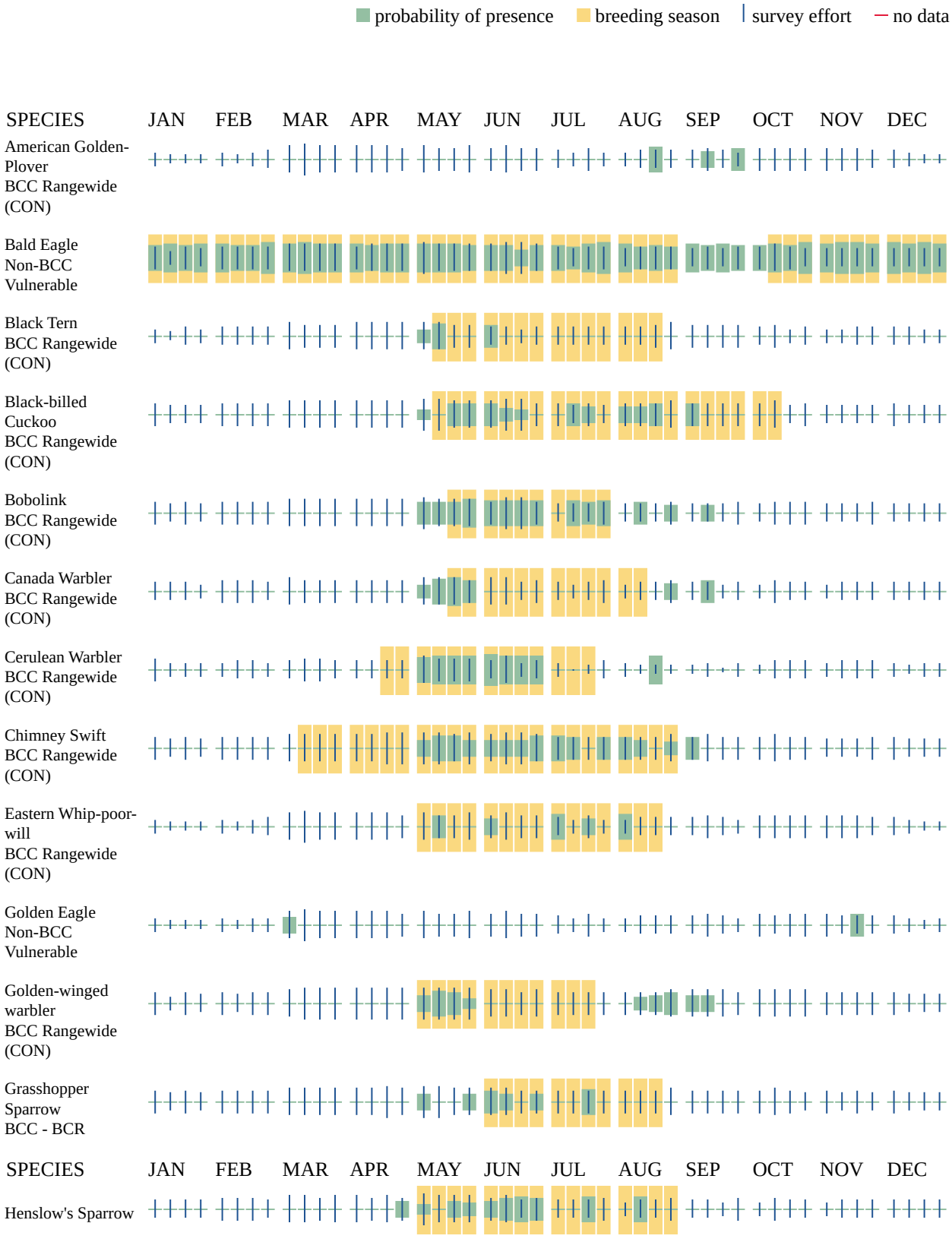
Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

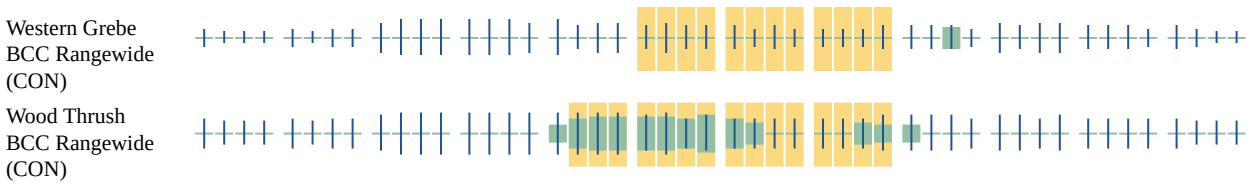
Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

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.


probability of presence
breeding season
survey effort
no data
SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
American Golden-Plover BCC Rangewide (CON)
Bald Eagle Non-BCC Vulnerable
Black Tern BCC Rangewide (CON)
Black-billed Cuckoo BCC Rangewide (CON)
Bobolink BCC Rangewide (CON)
Canada Warbler BCC Rangewide (CON)
Cerulean Warbler BCC Rangewide (CON)
Chimney Swift BCC Rangewide (CON)
Eastern Whip-poor-will BCC Rangewide (CON)
Golden Eagle Non-BCC Vulnerable
Golden-winged warbler BCC Rangewide (CON)
Grasshopper Sparrow BCC - BCR
SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
Henslow's Sparrow


BCC Rangewide (CON)
Hudsonian Godwit BCC Rangewide (CON)
Le Conte's Sparrow BCC Rangewide (CON)
Lesser Yellowlegs BCC Rangewide (CON)
Long-eared Owl BCC Rangewide (CON)
Marbled Godwit BCC Rangewide (CON)
Pectoral Sandpiper BCC Rangewide (CON)
Prairie Loggerhead Shrike BCC - BCR
Prothonotary Warbler BCC Rangewide (CON)
Red-headed Woodpecker BCC Rangewide (CON)
Ruddy Turnstone BCC - BCR
Rusty Blackbird BCC - BCR
SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
Semipalmated Sandpiper BCC - BCR
Short-billed Dowitcher BCC Rangewide (CON)
Upland Sandpiper BCC - BCR



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 avoidance and minimization measures for birds
- 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.

Due to your project's size, the list below may be incomplete, or the acreages reported may be inaccurate. For a full list, please contact the local U.S. Fish and Wildlife office or visit https://www.fws.gov/wetlands/data/mapper.HTML

FRESHWATER EMERGENT WETLAND

- PEM1/FO1C
- PEM1Cx
- PEM1Ch
- PEM1/SS1C
- PEM1Ad
- PEM1B
- PEM1/SS1Cx
- PEM1Ax
- PEM1C
- PEM1Af

- PEM1A
- PEM1/FOCh
- PEM1Ah

FRESHWATER FORESTED/SHRUB WETLAND

- PSS1A
- PSS1Ch
- PFO1B
- PFO1C
- PFO1/EM1Ax
- PFO1A
- PSS1Cx
- PSS1C
- PSS1/EM1C
- PFO1Ch
- PFO1/EM1C
- PSS1B
- PFO1Cx
- PSS1/EM1Ax
- PFO1/EM1B
- PFO1/EM1A

FRESHWATER POND

- PUBF
- PUBFx
- PABFh
- PABF
- PABHh
- PUBHx
- PUBFh
- PUBHh

RIVERINE

- R2UBGx
- R5UBH
- R5UBFx
- R2USC
- R2UBH
- R4SBA

- R2UBG
- R4SBC
- R4SBCx
- R2USA
- R2UBF

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hannah Phelps
Address: 1 Main Street SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email hannah.phelps@merjent.com
Phone: 3042761892

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers

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) 256-7289

In Reply Refer To: 08/05/2026 18:40:17 UTC
Project code: 2026-0104431
Project Name: Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

Subject: Technical Assistance letter for 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Hannah Phelps:

The U.S. Fish and Wildlife Service (Service) received on **August 05, 2026** your effect determination(s) for the 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link' (Action) using the Minnesota-Wisconsin DKey within the Service's Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your responses to the Service's Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Higgins eye (pearlymussel) (*Lampsilis higginsii*)	Endangered	May affect
Leedy's roseroot (*Rhodiola integrifolia ssp. leedyi*)	Threatened	NLAA
Monarch butterfly (*Danaus plexippus*)	Proposed Threatened	No effect
Prairie bush-clover (*Lespedeza leptostachya*)	Threatened	May affect
Salamander mussel (*Simpsonaias ambigua*)	Proposed Endangered	May affect
Sheepnose Mussel (*Plethobasus cyphyus*)	Endangered	May affect
Western prairie fringed Orchid (*Platanthera praeclara*)	Threatened	May affect
Whooping crane (*Grus americana*)	Experimental Population, Non-Essential	No effect

Determination Information

Consultation with the Service is not complete. Further consultation with the Minnesota-Wisconsin Ecological Services Field Office is required for those species with a determination of "May Affect," listed above. Please email our office at TwinCities@fws.gov and attach a copy of this letter, so we can discuss methods to avoid or minimize potential adverse effects to those species.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect federally listed species or federally designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

For non-Federal representatives: Please note that when a project requires consultation under section 7 of the Act, the Service must consult directly with the Federal action agency unless that agency formally designates a non-Federal representative (50 CFR 402.08). Non-Federal representatives may prepare analyses or conduct informal consultations; however, the ultimate responsibility for section 7 compliance under the Act remains with the Federal agency. Please include the Federal action agency in additional correspondence regarding this project.

Species-specific information

Freshwater Mussels: Freshwater mussels are one of the most critically imperiled groups of organisms in the world. In North America, 65% of the remaining 300 species are vulnerable to extinction (Haag and Williams 2014). Implementing measures to conserve and restore freshwater mussel populations directly improves water quality in lakes, rivers, and streams throughout Minnesota and Wisconsin. An adult freshwater mussel filters anywhere from 1 to 38 gallons of water per day (Baker and Levinton 2003, Barnhart pers. comm. 2019). A 2015 survey found that in some areas, mussels can reduce the bacterial populations by more than 85% (Othman et al. 2015 in Vaughn 2017). Mussels are also considered to be ecosystem engineers by stabilizing substrate and providing habitat for other aquatic organisms (Vaughn 2017). In addition to ecosystem services, mussels play an important role in the food web, contributing critical nutrients to both terrestrial and aquatic habitats, including those that support sport fish (Vaughn 2017). Taking proactive measures to conserve and restore freshwater mussels will improve water

quality, which has the potential to positively impact human health and recreation in the States of Minnesota and Wisconsin.

Federally listed mussels may be present in the Action area. Projects may adversely affect listed mussels if they permanently affect local hydrology, directly impact a stream (e.g., stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.), and/or indirectly impact a stream or riparian zone (e.g., cut and fill, horizontal directional drilling, construction, vegetation removal, discharge, etc.). Please coordinate with the Minnesota-Wisconsin Ecological Services Field Office to further evaluate effects of the Action on Federally listed mussels.
Listed Plants: Based on your answers and the assistance of the DKey, you have determined that the proposed Federal Action has the potential to adversely affect a threatened or endangered plant. **Please coordinate with the Minnesota-Wisconsin Ecological Services Field Office to further evaluate effects of the Action on listed plants.**

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the "taking" of bald and golden eagles and defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The Eagle Act's implementing regulations define disturb as "… to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

If you observe a bald eagle nest in the vicinity of your proposed project, you should follow the National Bald Eagle Management Guidelines (May 2007). For more information on eagles and conducting activities in the vicinity of an eagle nest, please visit our regional eagle website or contact Margaret at Margaret_Martin@fws.gov. If the Action may affect bald or golden eagles, additional coordination with the Service under the Eagle Act may be required.

Additional Species Requiring Review

In addition to the species described above, the following species or critical habitats may also occur in your project area and are not covered by this conclusion:

- Northern Long-Eared Bat *Myotis septentrionalis* Endangered
- Rusty patched bumble bee *Bombus affinis* Endangered
- Tricolored bat *Perimyotis subflavus* Proposed Endangered
- Western regal fritillary *Argynnis idalia occidentalis* Proposed Threatened

Coordination with the Service is not complete if additional coordination is advised above for any species.

Mussel References

Baker, S.M. and J. Levinton. 2003. Selective feeding by three native North American freshwater mussels implies food competition with zebra mussels. Hydrobiologia 505(1):97-105.

Haag, W. R. and J.D. Williams, 2014. Biodiversity on the brink: an assessment of conservation strategies for North American freshwater mussels. Hydrobiologia 735:45-60.

Morowski, D., L. James and D. Hunter. 2009. Freshwater mussels in the Clinton River, southeastern Michigan: an assessment of community status. Michigan Academician XXXIX: 131-148.

Othman, F., M.S. Islam, E.N. Sharifah, F. Shahrom-Harrison and A. Hassan. 2015. Biological control of streptococcal infection in Nile tilapia Oreochromis niloticus (Linnaeus, 1758) using filter-feeding bivalve mussel Pilsbryoconcha exilis (Lea, 1838). Journal of Applied Ichthyology 31: 724-728.

Vaughn, C.C. 2017. Ecosystem services provided by freshwater mussels. Hydrobiologia DOI: 10.1007/s10750-017-3139-x.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

2. Description

The following description was provided for the project 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link':

> The Project will be part of a 765 kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of two segments:
>
> Segment 1: A single-circuit 765 kV high voltage transmission line between the existing North Rochester Substation and a point near Marion, Minnesota;
>
> Segment 2: A 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@43.890113,-92.41188807963397,14z



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

   Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

   Yes
2. Is the action being funded, authorized, or carried out by a Federal agency?

   Yes
3. Are you the Federal agency or designated non-federal representative?

   No
4. Does the action involve the installation or operation of wind turbines?

   No
5. Does the action involve purposeful take of a listed animal?

   No
6. Does the action involve a new communications tower?

   No
7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc)?

   No
8. Will your action permanently affect local hydrology?

   No
9. Will your action temporarily affect local hydrology?

   No
10. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

    No

11. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

    Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

    Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

    Yes

12. Will your action disturb the ground or existing vegetation?

    Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

    Yes

13. Will your action include spraying insecticides?

    No

14. Does your action area occur entirely within an already developed area?

    Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

    No

15. Your project is within the range of federally listed freshwater mussels. Have surveys for freshwater mussels been conducted according to a Service-approved survey plan?

    Note: You must receive prior approval for any proposed mussel survey by contacting the Minnesota-Wisconsin Ecological Services Field Office. All mussel surveys in Minnesota and Wisconsin must comply with State approved protocols.
    Minnesota Mussel Protocol: https://files.dnr.state.mn.us/eco/nhnrp/mn-mussel-survey-and-relocation-protocol.pdf.
    Wisconsin Mussel Protocol: https://molluskconservation.org/Library/Protocol%20PDFs/WI%20Wadable%20Mussel%20Protocol_8-18-15.pdf

    No

16. [Semantic] Does the project intersect the Salamander mussel AOI?

    Automatically answered
    Yes

17. Does western prairie fringed orchid occur in the action area?

    Yes

18. Did you conduct a survey to determine if western prairie fringed orchid (WPFO) occurs in the action area? If yes, please upload survey results.

    No

19. Will the project indirectly alter the habitat or resources of western prairie fringed orchid? (I.e., could your action result in a change in canopy cover, microclimate, humidity; increase in invasive species; hydrologic alterations, etc.?)
    If unsure, select yes.

    Yes

20. Does Leedy's roseroot occur in the action area?

    Yes

21. Did you conduct a survey to determine if Leedy's roseroot (LERO) occurs in the action area? If yes, please upload survey results.

    No

22. Will the project indirectly alter the habitat or resources of Leedy's roseroot?
    (I.e., could your action result in an increase in erosion or runoff above or on cliff faces; a decrease in cliff stability; introduction of invasive species; change in canopy cover, microclimate, or humidity; hydrologic alterations, etc.?)
    If unsure, select yes.

    No

23. Could the action directly harm Leedy's roseroot?
    (I.e., does your action include prescribed fire, herbicide application, trampling, grazing, cutting/clearing, cultivation, crushing by vehicle, reduce to possession, etc.?)

    No

24. Does prairie bush-clover occur in the action area?

    Yes

25. Did you conduct a survey to determine if prairie bush-clover (PBC) occurs in the action area? If yes, please upload survey results.

    No

26. Will the project indirectly alter the habitat or resources of prairie bush-clover?
    (I.e., could your action result in a change in canopy cover, microclimate, humidity, increase in invasive species, hydrologic alterations, etc.?)
    If unsure, select yes.

    Yes

27. Have you determined that the action will have no effect on individuals within the whooping crane nonessential experimental population (NEP)?

    Yes

28. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

    Automatically answered
    Yes

29. Under the ESA, monarchs remain warranted but precluded by listing actions of higher priority. The monarch is a candidate for listing at this time. The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary.

    If your project will have no effect on monarch butterflies (for example, if your project won't affect their habitat or individuals), then you can make a "no effect" determination for this project.

    Are you making a "no effect" determination for monarch?

    Yes

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hannah Phelps
Address: 1 Main Street SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email hannah.phelps@merjent.com
Phone: 3042761892

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers

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) 256-7289

In Reply Refer To: 08/05/2026 18:48:17 UTC
Project code: 2026-0104431
Project Name: Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

Federal Nexus: yes
Federal Action Agency (if applicable): Army Corps of Engineers

Subject: Technical assistance for 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link'

Dear Hannah Phelps:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on August 05, 2026, for 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link' (here forward, Project). This project has been assigned Project Code 2026-0104431 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey), invalidates this letter.**

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Northern Long-Eared Bat (*Myotis septentrionalis*)	Endangered	May affect

Tricolored bat (*Perimyotis subflavus*)	Proposed Endangered	May affect

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate. Projects that receive a may affect determination for tricolored bat through the key, should contact the appropriate Ecological Services Field Office if they want to conference on this species.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Higgins eye (pearlymussel) *Lampsilis higginsii* Endangered
- Leedy's roseroot *Rhodiola integrifolia ssp. leedyi* Threatened
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- Prairie bush-clover *Lespedeza leptostachya* Threatened
- Rusty patched bumble bee *Bombus affinis* Endangered
- Salamander mussel *Simpsonaias ambigua* Proposed Endangered
- Sheepnose Mussel *Plethobasus cyphyus* Endangered
- Western prairie fringed Orchid *Platanthera praeclara* Threatened
- Western regal fritillary *Argynnis idalia occidentalis* Proposed Threatened
- Whooping crane *Grus americana* Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may cause prohibited take of the species listed above.

Conclusion

Consultation with the Service is not complete. Further consultation or coordination with the Service is necessary for those species or designated critical habitats with a determination of “May Affect.” A “May Affect” determination in this key indicates that the project, as entered, is not consistent with the questions in the key. Not all projects that reach a “May Affect” determination are anticipated to result in adverse impacts to listed species. These projects may result in a “No Effect”, “May Affect, Not Likely to Adversely Affect”, or “May Affect, Likely to Adversely Affect” determination depending on the details of the project. Please contact our

Minnesota-Wisconsin Ecological Services Field Office to discuss methods to avoid or minimize potential adverse effects to those species or designated critical habitats.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

2. Description

The following description was provided for the project 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link':

> The Project will be part of a 765 kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of two segments:
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> Segment 2: A 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@43.890113,-92.41188807963397,14z



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species that is not covered by an existing section 10 (a)(1)(A) Recovery Permit, exempted under section 4(d) or authorized by a section 6 cooperative agreement? **Note:** Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/ encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

   No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

   Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

   No

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

   No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

   No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered

    No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

    No

12. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

    No

13. Is the action located in New England (CT, MA, ME, NH, RI, or VT)?

    No

14. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

15. Will the action result in effects to a culvert or tunnel at any time of year?

    No

16. Are trees present within 1000 feet of the action area? **Note:** If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

17. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

    No

18. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

    No

19. Will the action cause construction of one or more new roads open to the public?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

    No

21. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

    For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

22. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

    Note: For information regarding NSF/ANSI 60 please visit https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects

    No

23. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

    No

24. Will the action include drilling or blasting?

    Yes

25. Will the drilling or blasting produce noise or vibrations above existing background levels that will affect suitable summer habitat for northern long-eared bats and/or tricolored bats? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and/or tricolored bat, can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines.

    Yes

26. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

    No

27. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

    Yes

28. Will the action include or result in herbicide use that may affect suitable summer habitat for the northern long-eared bat or tricolored bat? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

29. Will all herbicide use that may affect suitable summer habitat for the northern long-eared bat or tricolored bat include only targeted application methods like hack-and-squirt, basal bark, injections, cut-stump, or spot-spraying (foliar spraying on individual herbaceous plants with no foliar spraying of deciduous tree leaves or Spanish moss)? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

30. Will the action include or cause the application or drift of pesticides (e.g., fungicides, insecticides, or rodenticides) into forested areas that are suitable summer habitat for the northern long-eared bat or tricolored bat? Answer "Yes" if the application may result in transport (e.g., in water) or aerial drift of the pesticide into forested areas that are suitable summer habitat for the northern long-eared bat or tricolored bat. **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

31. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season? Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining. **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

32. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable forested northern long-eared bat or tricolored bat roosting habitat? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

33. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

    Yes

34. Is the project related to the production of coal, including projects that support the mining of coal, as well as the production and/or distribution of energy produced from coal?

    No

35. Will the proposed action occur exclusively in an already established and currently maintained utility right-of-way?

    No

36. Does the action include emergency cutting or trimming of hazard trees in order to remove an imminent threat to human safety or property? See hazard tree note at the bottom of the key for text that will be added to response letters

    Note: A "hazard tree" is a tree that is an immediate threat to lives, public health and safety, or improved property.

    No

37. Does the project intersect with the 0- 9.9% forest density category?

    Automatically answered
    Yes

38. Does the project intersect with the 10.0- 19.9% forest density category map?

    Automatically answered
    Yes

39. Does the project intersect with the 20.0- 29.9% forest density category map?

    Automatically answered
    Yes

40. Does the project intersect with the 30.0- 100% forest density category map?

    Automatically answered
    Yes

41. Will the action cause trees to be cut, knocked down, or otherwise brought down across an area greater than 0.5 acre in total extent?

    Yes

42. Does the action area intersect the northern long-eared bat species list area?

    Automatically answered
    Yes

43. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

44. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

45. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.Have you contacted the appropriate agency to determine if your action is within 150 feet of any documented northern long-eared bat roosts?

    Note: A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat roosts is available here. Location information for northern long-eared bat roosts is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

    Automatically answered
    No

46. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities? If unsure, answer "Yes." **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines

    Yes

47. Has a presence/probable absence summer bat survey targeting the northern long-eared bat following the Service's Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines been conducted within the project area?

    No

48. Does the action area intersect the tricolored bat species list area?

    Automatically answered
    Yes

49. Is the action area located within 0.5-mile of radius of an entrance/opening to any known tricolored bat hibernacula or winter roost?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

    Automatically answered
    No

50. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

51. Is suitable summer habitat for the tricolored bat present within 1000 feet of project activities? (If unsure, answer ""Yes."") **Note:** If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer ""Yes."" For a complete definition of suitable summer habitat for the tricolored bat, please see the Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines.

    Yes

52. Do you have any documents that you want to include with this submission?

    No

PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

20

If tree cutting will be part of the proposed action, at what time of year will tree cutting be conducted?

During the inactive season for bats.

Can the proposed action be modified to ensure that tree cutting will be conducted outside of the season when bats will be present and roosting in trees?

Yes,

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hannah Phelps
Address: 1 Main Street SE, Suite 300
City: Minneapolis
State: MN
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Email hannah.phelps@merjent.com
Phone: 3042761892

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers

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) 256-7289

In Reply Refer To: 08/05/2026 19:09:29 UTC
Project code: 2026-0104431
Project Name: Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

Federal Nexus: yes

Federal Action Agency (if applicable): Army Corps of Engineers

Subject: Technical Assistance letter for 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link' for rusty patched bumble bee that may occur in your proposed project location consistent with the Rusty Patched Bumble Bee Range Wide Determination Key (RPBB DKey).

Dear Hannah Phelps:

This letter records your determination using the RPBB DKey within the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (USFWS) on **August 05, 2026**, for 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link' (here forward, Project). This project has been assigned Project Code '2026-0104431' and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC Determination Keys

The USFWS developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.). All information submitted by the Project proponent into the IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the RPBB DKey, invalidates this letter.**

Determination for the Rusty Patched Bumble Bee

Based on your answers and the assistance of the USFWS' RPBB DKey, you made the following effect determination for the proposed Action:

Species	Listing Status	Determination

Rusty patched bumble bee (*Bombus affinis*)	Endangered	May affect

Consultation with the USFWS is not complete. This determination was reached because the RPBB DKey was unable to provide a conclusion for activities which you were either unsure about the determination or you chose to make a “may affect” determination. If the RPBB DKey was unable to provide a conclusion, this does not necessarily mean that the project is likely to adversely affect the species.

Your agency’s ESA section 7 consultation requirement for rusty patched bumble bee with the USFWS is not complete, and further consultation with the USFWS is required. Please email the local USFWS Ecological Services Field Office and attach a copy of this letter, so we can discuss methods to avoid or minimize potential adverse impacts.

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the rusty patched bumble bee **does not** apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Higgins eye (pearlymussel) *Lampsilis higginsii* Endangered
- Leedy's roseroot *Rhodiola integrifolia ssp. leedyi* Threatened
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- Northern Long-Eared Bat *Myotis septentrionalis* Endangered
- Prairie bush-clover *Lespedeza leptostachya* Threatened
- Salamander mussel *Simpsonaias ambigua* Proposed Endangered
- Sheepnose Mussel *Plethobasus cyphyus* Endangered
- Tricolored bat *Perimyotis subflavus* Proposed Endangered
- Western prairie fringed Orchid *Platanthera praeclara* Threatened
- Western regal fritillary *Argynnis idalia occidentalis* Proposed Threatened
- Whooping crane *Grus americana* Experimental Population, Non-Essential

Coordination with the USFWS is advised for any species and/or critical habitat listed above.

You should coordinate with our Office to determine whether the Action may affect the species and/or critical habitat listed above and if further consultation is required. Note that reinitiation of consultation would be necessary if a new species is listed or critical habitat designated that may be affected by the identified action before it is complete.

If you have any questions regarding this letter or need further assistance, please contact the local Ecological Services Field Office and reference Project Code ‘2026-0104431’ associated with this Project. See the top of this letter for the Project Code.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the local Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect rusty patched bumble bee in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to rusty patched bumble bee; or 4) or critical habitat is designated. If any of the above conditions occur, additional consultation with the Service should take place before project changes are final or resources are committed.

For non-Federal representatives: Please note that when a project requires consultation under section 7 of the Act, the USFWS must consult directly with the Federal action agency unless that agency formally designates a non-Federal representative (50 CFR 402.08). Non-Federal representatives may prepare analyses or conduct informal consultations; however, the ultimate responsibility for section 7 compliance under the Act remains with the Federal agency. Please include the Federal action agency in additional correspondence regarding this project.

Species-specific information

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “… to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

If you observe a bald eagle nest in the vicinity of your proposed project, you should follow the National Bald Eagle Management Guidelines (May 2007). For more information on eagles and conducting activities in the vicinity of an eagle nest, please visit our regional eagle website or contact the local Ecological Services Field Office. If the Action may affect bald or golden eagles, additional coordination with the Service under the Eagle Act may be required.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link

2. Description

The following description was provided for the project 'Northern States Power Company and Dairyland Power Cooperative - Gopher to Badger Link':

> The Project will be part of a 765 kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of two segments:
>
> Segment 1: A single-circuit 765 kV high voltage transmission line between the existing North Rochester Substation and a point near Marion, Minnesota;
>
> Segment 2: A 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@43.890113,-92.41188807963397,14z



QUALIFICATION INTERVIEW

1. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

2. Are you the Federal agency or designated non-federal representative?

   No

3. Does the action area overlap with a rusty patched bumble bee high potential zone?

   Automatically answered
   Yes

4. Is the action being implemented under one of the following Natural Resources Conservation Service (NRCS) or Farm Service Agency (FSA) programs?

   - Conservation Reserve Program
   - Environmental Quality Incentive Program
   - NRCS Easement Program, Farm Loan Program
   - Farm Storage Facility Loan Program

   No

5. Does the action include - or is it reasonably certain to cause - intentional take of rusty patched bumble bee (rusty patched bumble bee) that is not covered under a scientific recovery permit under section 10(A)1(a) of the Endangered Species Act or under a cooperative agreement with a state agency?

   Note: This could include, for example, surveys or studies that include handling or capture of the species. Whether "Project Review" surveys using USFWS protocols were conducted as part of the action is addressed later in this key.

   No

6. Does the action include – or is it reasonably certain to result in – construction of one or more new roads or rail lines that will result in vehicle traffic speeds at 45mph or higher in a rusty patched bumble bee HPZ? For example, answer 'NO' if the project will construct a low speed (< 30 mph) road (Such as Forest Service Road Maintenance Levels 1 -3 (refer to https://www.fs.usda.gov/eng/pubs/pdf/05771205.pdf).

   No

7. Does the action include – or is it reasonably certain to result in – the addition of one or more travel lanes that are likely to increase vehicle speeds to at least 45mph on one or more existing roads in a rusty patched bumble bee HPZ? For example, answer NO if considering a travel lane addition that maintains road with low speeds (< 30 mph).

   No

8. Is an increase in vehicular traffic speeds to over 45mph to an existing road in one or more HPZs a likely outcome of the federal action? For example, answer 'NO' if traffic speeds would stay relatively low (e.g., 30 mph).

   No

9. Does the action include – or is it reasonably certain to cause – the use of commercial/ managed bees (e.g., the use of honeybees or managed bumble bees to pollinate crops).

   No

10. Have you conducted a habitat assessment for nesting, overwintering, and/or foraging habitat suitability in your action area? (Note, conducting a habitat assessment will expediate our review and assist you with answering habitat questions below and may be reviewed by USFWS).

    Habitat descriptions: Suitable overwintering habitat: Contiguous upland forest habitat, at least 25 meters (82 feet) from a non-forested edge (i.e., a minimum patch size of 0.75 acres), with herbaceous and woody plants that provide spring pollen and nectar for spring queen foraging immediately after emergence from diapause, leaf litter or duff for burrowing, and without dense invasive plant understory vegetation. For overwintering, rusty patched bumble bees also need well-drained, uncompacted, loose soils sheltered from the elements. Suitable nesting habitat: Upland grasslands, shrublands, savannas, and the forest edge interface between forested and non-forested natural habitats that extends approximately 30 meters (98 feet) into the forest. Rusty patched bumble bees also need abandoned rodent burrows, other mammal burrows, or cavities with ample cover, or similar existing cavities at the soil surface or below to roughly 4 feet underground for nesting. For nesting, rusty patched bumble bees also need well-drained, uncompacted, loose soils sheltered from the elements. In the Appalachians, interior forest with these elements is also considered nesting habitat. is also considered nesting habitat. Suitable foraging habitat: Diverse and abundant native floral resources. Open grasslands, shrublands, savanna, riparian, and/or palustrine wetlands and seasonally -flooded wetlands with flowering vegetative cover, including flowering shrubs, trees and/or understory native plants. Or forested edge habitats adjacent to open areas with flowering plants and over 10% vegetative cover. Ideally, foraging resources should be in bloom throughout the active flight seasons (spring, summer and fall), however this may not be possible given the habitat type.

    No

11. Is there suitable habitat for nesting, foraging, and/or overwintering for the rusty patched bumble bee in the action area?

    Note: Please refer to descriptions of suitable habitat in the questions above, or within the ESA Section 7(a)(2) Voluntary Implementation Technical Assistance for Rusty Patched Bumble Bee at: https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-technical-assistance-rusty-patched-bumble-bee.

    Yes

12. Have “Project Review” surveys for rusty patched bumble bees already been conducted in the action area according to Service-approved protocols? If you don't know, answer 'NO'.

    Note: the Rusty Patched Bumble Bee Reporting Form can be found at https://www.fws.gov/media/rusty-patched-bumble-bee-reporting-form

    No

13. Does the action include collection of seed from native species?

    No

14. Does the action include, or will it cause the application of insecticides or fungicides?

    No

15. Does the action include, or will it cause activities to control native rodent species (such that it may cause a reduction in available nesting cavities)?

    No

16. Does the action include, or will it cause planting or seeding of non-native plant species?

    No

17. Will the action include or cause herbicide use?

    Yes

18. Will herbicide application methods include only wiping individual plants with a wick or glove, cut-stump, spot-spraying, or basal bark treatments?

    Yes

19. Will the action cause an increase in the extent or duration of surface flooding or soil saturation in rusty patched bumble bee overwintering or nesting habitat in a High Potential Zone?

    Note: This may occur, for example, as a result of activities or structures that impound water, otherwise alter or interrupt existing drainage patterns, or that affect surface runoff.

    No

20. Will the action cause ground disturbance in suitable rusty patched bumble bee nesting habitat?

    Note: suitable nesting habitat: Upland grasslands, shrublands, savannas, and the forest edge interface between forested and non-forested natural habitats that extends approximately 30 meters (98 feet) into the forest. Rusty patched bumble bees also need abandoned rodent burrows, other mammal burrows, or cavities with ample cover, or similar existing cavities at the soil surface or below to roughly 4 feet underground for nesting. For nesting, rusty patched bumble bees also need well-drained, uncompacted, loose soils sheltered from the elements. In the Appalachians, interior forest with these elements is also considered nesting habitat is also considered nesting

    Yes

21. Will the impacts to habitat occur in medium-high-quality nesting habitat? (if you are unsure or are unable to assess the quality, answer 'YES').

    Yes

22. Will the ground disturbance within the High Potential Zone affect more than 0.30 acre (0.1 hectare) of rusty patched bumble bee nesting habitat?

    Yes

23. Will the ground disturbance occur during the nesting season (April 15 to October 10)?

    Yes

24. You have reached a determination of may affect for the rusty patched bumble bee.

    Automatically answered
    Yes

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hannah Phelps
Address: 1 Main Street SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email hannah.phelps@merjent.com
Phone: 3042761892

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Army Corps of Engineers

From: O"Brien, Katie E
To: Kristin Lenz; Tawes, Robert
Cc: Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence
Subject: EXTERNAL: Re: [EXTERNAL] Gopher to Badger Link Project Update
Date: Thursday, August 20, 2026 12:02:36 PM
Attachments:

CAUTION: This email originated from outside of Merjent.

Dear Kristin:

Thank you for reaching out to the Minnesota-Wisconsin Field Office with this update and the refined potential routes for the Xcel Energy and Dairyland Power Cooperative proposed Gopher to Badger Link 765 kV Transmission Line Project (Gopher – Badger Link Project). Our comments are provided in accordance with the Endangered Species Act (16 U.S.C. 1531-1544) (ESA), Migratory Bird Treaty Act (16 U.S.C. 703-712) (MBTA), and Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d).

- Please continue to consult with our Information for Planning and Consultation (IPaC) system (https://ipac.ecosphere.fws.gov/) as you progress through the planning phases for the most up-to-date species list, determination keys, and conservation measures. Species that are either federally protected or proposed for protection may occur in the project area.

- The U.S. Fish and Wildlife Service (FWS) manages the Upper Mississippi River National Wildlife and Fish Refuge within the Gopher – Badger Link Project Area.
    - A map of FWS land interests can be accessed at https://gis-fws.opendata.arcgis.com/datasets/fws::fws-national-realty-boundaries/about. This data layer depicts land and water administered by the U.S. Fish and Wildlife Service in North America, U.S. trust territories and possessions categorized by the type of legal interest the agency possesses or administers. In addition to National Wildlife Refuges, FWS manages Waterfowl Production Areas (WPAs) which include fee title lands (WPAs) and conservation easement interest lands (habitat, wetland, and Farmers Home Administration (FmHA) easements). Conservation easements are lands where FWS has worked with landowners to purchase and permanently protect upland and/or wetland habitat on private property to provide benefits to migratory bird populations. These lands are managed through the National Wildlife Refuge Administration Act (16 USC668 dd), and proposed uses of these lands cannot be allowed unless they are compatible (Compatibility Policy 603 FW2) with the purposes for which the unit was

established. Our goal is to work with you to identify route alternatives that completely avoid or minimize impacts to federal interest lands managed by the FWS. We recommend that you coordinate route alternatives with the FWS Project Leader responsible for administering NWRS lands within the geographic area of the project, Sabrina Chandler (sabrina_chandler@fws.gov, 507-204-2094).

- The Gopher – Badger Link Project Area occurs within a sensitive area for migratory birds (i.e., Upper Mississippi River Fish and Wildlife Refuge and Blufflands Root-River Important Bird Area). We recommend consulting with the Cornell Lab of Ornithology's eBird database (https://ebird.org/home) and Birdcast website (https://birdcast.info) for more robust and real-time data on bird occurrence and timing/composition/estimated altitude of bird migration throughout the Gopher – Badger Link Project Area. While incidental take is not prohibited under the MBTA, we believe that siting and design concessions could avoid or minimize impacts of the project to migratory birds.
    - If the Gopher - Badger Link Project will include tree-clearing activities, we request that you evaluate and disclose impacts to all forest-dwelling species of federal interest and include associated conservation measures to minimize risk, impacts, and adverse effects:
        - We recommend limiting forest clearing activities to occur outside of the migratory bird nesting season (March 1 – August 31) and summer occupancy period for Northern Long-eared Bat (April 15 – September 30). If clearing must be completed within the bat occupancy season, we recommend surveys be conducted to avoid or minimize take of federally protected species.
    - We recommend development of an Avian Protection Plan to reduce avian risk of electrocution, collision, and death, as well as bird-caused power outages. We recommend inclusion of the following guidelines from the Avian Power Line Interaction Committee:
        - To ensure adequate clearance, design structures should, at a minimum, provide at least 60 inches of horizontal separation between energized conductors and/or energized conductors and grounded hardware and 48-60 inches of vertical separation.
            - Avoid siting lines in areas where birds concentrate (i.e., wetlands, stream crossings, historic staging areas, roosts, and nesting colonies).
            - Install visibility enhancement devices (e.g., marker spheres, spirals, suspended devices, bird diverters) placed in varying

configurations, depending on the line design and location; large diameter wire may also increase line visibility.

- If a "problem pole" is identified (i.e., documented avian collision, electrocution, problem nest material, or high risk of avian mortality), we recommend retrofitting the pole by: 1) covering jumper wires, conductors, and equipment; 2) discouraging perching in unsafe areas (e.g., perch guards); 3) reframing; 4) replacing a structure; or 5) providing safe alternatives for perching and nesting (e.g., nesting platforms).
- When collisions cannot be reduced by another method, such as line marking or managing surrounding lands, the configuration of an existing line can sometimes be changed to minimize collisions. Options for changes might include: 1) lowering the height of the lines (e.g., below the tree line); 2) changing the wire diameter; 3) bundling wires; 4) using spacers to improve visibility; 5) rearranging wire configuration (e.g., converting from vertical to horizontal); 6) changing the structure type to increase its visibility; or 7) decreasing span length (e.g., by adding a pole mid-span).
- Consider construction, placement, and monitoring of nest boxes for cavity-nesting populations, as well as bats and flying squirrels.

- We recommend limiting any increase in lighting of native habitats during the avian breeding season through the following actions:
  - To the maximum extent practicable, limit construction activities to the time between dawn and dusk to avoid illumination of adjacent habitat areas.
  - If construction activity time restrictions are not possible, use down shielding or directional lighting to avoid light trespass into wildlife habitat. To the maximum extent possible, while allowing for public safety, low intensity lighting should be used.
  - Eliminate the use of steady burning lights on tall structures (e.g., greater than 200 feet in height; Federal Aviation Administration (FAA) regulations allow for the use of intermittently flashing white or red lights).

- If the Gopher - Badger Link Project may impact bald or golden eagles, we would encourage you to obtain an eagle take permit. Eagle take permits are voluntary, and Xcel Energy/Dairyland Cooperative must assess its own risk of impacts to eagles.

The most up-to-date information on the permitting process (including eligibility requirements for "General" and "Specific" permits) can be found on the Eagle Incidental Take Permits for Powerlines webpage: https://www.fws.gov/program/eagle-management/power-line-permits.

- We recommend siting the Gopher - Badger Link Project to minimize habitat fragmentation by adhering to existing developed Rights-of-Way (ROW) to the greatest extent possible.

- We recommend preservation and enhancement of native plant communities, especially for re-vegetation of areas disturbed within new and existing ROW and associated facilities, to ensure on-going protection of native plant communities and pollinator species:
    - For temporary and permanent habitat restoration/abatement, use only native and local (when possible) seed and plant stock. Pollinator-favored plants can be found on this list: https://www.fws.gov/media/plants-favored-rusty-patched-bumble-bee.
    - Consider creating vehicle wash stations prior to entering sensitive habitat areas to prevent accidental introduction of non-native plants.
    - Because pollinators are dependent on flowering plants for nutrients and energy, especially in the summer, we recommend mowing at a rate or height that does not reduce a significant number of flowering plants for foraging pollinators (for additional recommendations, please review this document: https://www.fws.gov/media/conservation-management-technical-assistance-rusty-patched-bumble-bee).
    - If possible, we recommend that any mowing or ground disturbance during construction or maintenance not take place until after the native plant communities have stopped flowering.

Please do not hesitate to contact me should you have any questions or concerns. We appreciate your early coordination efforts. We believe, through continued discussion, that we can help develop wildlife-focused measures to protect federal trust resources while meeting the Gopher - Badger Link Project's energy production objectives.

Sincerely,
Katie

Katie O'Brien
U.S. Fish and Wildlife Service - Midwest Region

katie_obrien@fws.gov | 612.413.4873
Minnesota-Wisconsin Ecological Services

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 1:59 PM
To: Twin Cities, FW3 <TwinCities@fws.gov>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: [EXTERNAL] Gopher to Badger Link Project Update

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile

kristin.lenz@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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United States Fish and Wildlife Service

Upper Mississippi River National Wildlife and Fish Refuge

From: Michael Peters
To: Chandler, Sabrina; Pednault, Kendra
Cc: Coffield, Lucas
Subject: MariBell Fact Sheet
Date: Monday, March 2, 2026 4:42:06 PM
Attachments:

Sabrina and Kendra,

Attached you will find a Fact Sheet for the MariBell project, and a breakdown of its relationship to the additional 765 kV Transmission Line Projects in the area. The document was developed following previous discussions in which some questions were expressed regarding how the MariBell Project fit in with the overall 765 kV buildout in the area, and your indications that such a document would be of benefit for your team.

Additionally, we are finalizing internally a formal notice of our intentions to initiate a land exchange for the 765 kV transmission line crossing near Genoa, Wisconsin. We anticipate that notice will be submitted by the end of the week. Following its submittal, we are hoping to schedule a meeting with you two in the relative near term to discuss the next steps in this process. Considering the spring field seasons are likely to be ramping up for both of you, would you be able to send us any availability you two would have to get together in mid to late March. We are thinking a 2-hour meeting would likely be sufficient to get these discussions started, and we would be flexible as your thoughts on if you would like to hold the meetings in-person or virtually. If you could send us over a handful of times that you two would be available to meet, we will work internally to prioritize a time to get a meeting on the schedule.

Thanks to both of you, and let me know if you have any questions, comments, or concerns on both the above or the attached Fact Sheet.

Mike Peters

Michael Peters
Environmental Permitting Lead
Regional Transmission Projects
Dairyland Power Cooperative
3200 East Ave South
P.O. Box 817, La Crosse, WI 54602-0817
Phone: (608) 787-1300
Michael.Peters@DairylandPower.com

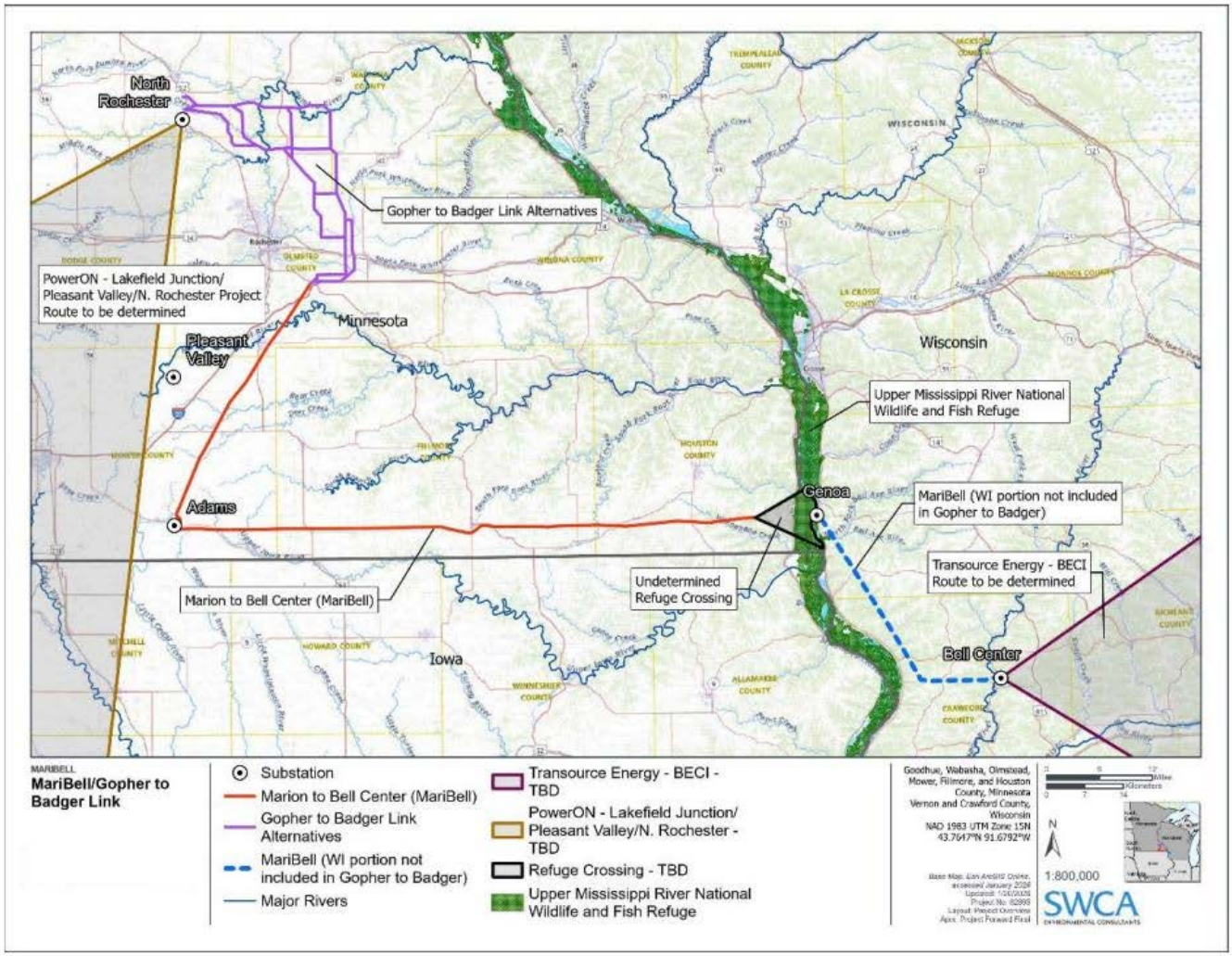
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DAIRYLAND POWER COOPERATIVE
A Touchstone Energy® Cooperative

GridLiance HEARTLAND

AGENCY PROJECT FACT SHEET

MariBell 765/161 kV Transmission Line Project
Parallel Federal and State Processes (Minnesota and Wisconsin)



AGENCY PROJECT FACT SHEET

Name:	**MariBell 765/161 kV Transmission Line Project (MariBell Project or Project)***
Related Project Names*	**Minnesota-Wisconsin Reliability Link - (Dairyland Power Cooperative [DPC] and GridLiance**) – Previous (historical) name of the MariBell Project. **Gopher to Badger Link - (Xcel Energy, GridLiance, and DPC)** – 765 kilovolt (kV) project in Minnesota stretching from North Rochester to the Minnesota–Wisconsin state line. The section from Marion, Minnesota, to the Minnesota/Wisconsin state line overlaps the Minnesota portion of the MariBell Project. . **PowerOn Midwest** – **(Xcel Energy, ITC and Great River Energy)** – 765 kV project connecting Lakefield Junction, Minnesota to North Rochester, Minnesota. **BECI (Bell Center – Columbia – Sugar Creek – IL/WI State Line) - (Transource) –** A separate 765 kV project consisting of three 765 kV transmission line facilities in Wisconsin extending from Bell Center, Wisconsin to Columbia, Wisconsin, and southwest to the Illinois/Wisconsin state line.
Location	The MariBell project extends from **Marion, Minnesota**, across the driftless region and the Mississippi River to an interconnection point near **Bell Center, Wisconsin**, and proposes to **rebuild and co-locate an existing 161 kV DPC transmission line** with a new 765-kV line **using the existing right-of-way (ROW).**
U.S. Fish and Wildlife (USFWS) Refuge	Upper Mississippi River National Wildlife and Fish Refuge – Co-location with existing 161 kV lines at Genoa/Reno Bottoms and on easement managed lands in the McGregor District.
Counties (MariBell Project)	**Minnesota** – Olmsted, Mower, Fillmore, and Houston **Wisconsin** – Vernon and Crawford
Project Components	**Minnesota –** MariBell (GridLiance and DPC) – Approximately 105 miles of 765 kV/161 kV double-circuit high-voltage transmission line between Marion, Minnesota, and the Minnesota/Wisconsin state line. Applicants propose the use of four-legged self-supporting lattice structures. Generally, the structures will be placed 1,200 to 1,500 feet apart and will typically be 150 to 199 feet in height and located on a ROW of up to ~250 feet in width. **In the vicinity of the Mississippi River crossing the existing easement is 200 feet, and the structure design/height/ROW width will be determined through agency and resource considerations.** **Wisconsin –** MariBell (GridLiance and DPC) – This segment consists of approximately 32 miles of 765 kV/161 kV double-circuit high-voltage transmission line between the Mississippi River crossing and Bell Center, Wisconsin. Minnesota/Wisconsin state line. Applicants propose the use of four-legged self-supporting lattice structures. Generally, the structures will be placed 1,200 to 1,500 feet apart and will typically be 150 to 199 feet in height and located on a ROW of up to ~250 feet in width. **In the vicinity of the Mississippi River crossing the existing easement is 200 feet, and the structure design/height/ROW width will be determined through agency and resource considerations.**
Project Purpose	This project is part of a larger effort by **MISO to maintain a resilient, reliable and flexible electric grid**.

AGENCY PROJECT FACT SHEET

Status

- Voluntary public meetings underway in both Minnesota and Wisconsin
- Certificate of Need application filing in Minnesota in February 2026
- Minnesota Route Permit and Wisconsin Certificate of Public Convenience and Necessity (CPCN) application filings expected in late 2026
- Pre-application meetings have begun with Upper Mississippi River National Wildlife and Fish Refuge
- Initial voluntary outreach via written correspondence to several Tribes with ancestral connections to the project area was performed in December 2025. This voluntary outreach and engagement effort is not intended to replace formal government-to-government consultation.

Tribes contacted for initial voluntary outreach
Northern Arapaho Tribe
Fort Peck Assiniboine & Sioux Tribes
Bad River Band of Lake Superior Chippewa Tribe
Cheyenne and Arapaho Tribes
Cheyenne River Sioux Tribe
Chippewa Cree Tribe
Flandreau Santee Sioux Tribe
Forest County Potawatomi
Fort Belknap Indian Community
Ho-Chunk Nation
Iowa Tribe of Kansas & Nebraska
Lac Courte Oreilles Band of Lake Superior Chippewa Indians
Lac du Flambeau Band of Lake Superior Chippewa Indians
Lac Vieux Desert Band of Lake Superior Chippewa Indians
Lower Sioux Indian Community
Gun Lake Tribe
Menominee Indian Tribe
Miami Tribe of Oklahoma
Bois Forte Band of Chippewa
Fond du Lac Band of Lake Superior Chippewa
Grand Portage Band of Chippewa
Leech Lake Band of Ojibwe
Mille Lacs Band of Ojibwe
White Earth Nation
Northern Cheyenne Tribe
Omaha Tribe of Nebraska
Onieda Nation

Otoe-Missouria Tribe
Prairie Island Indian Community
Red Cliff Band of Lake Superior Chippewa Indians
Red Lake Nation
Rosebud Sioux Tribe
Meskwaki Nation
Saginaw Chippewa Tribe
Santee Sioux Nation
Shakopee Mdewakanton Sioux Community
Sisseton Wahpeton Oyate
Sokaogon Chippewa Community
Spirit Lake Tribe
St. Croix Chippewa Indians
Standing Rock Sioux Tribe
Stockbridge-Munsee Community
Mandan, Hidatsa, and Arikara Nation
Turtle Mountain Band of Chippewa Indians
Upper Sioux Community
Winnebago Tribe of Nebraska
Yankton Sioux Tribe

From: Michael Peters
To: Chandler, Sabrina; Pednault, Kendra
Cc: Clay DeWitt; Hewitt, Jessica; Coffield, Lucas
Subject: MariBell Transmission Line Potential Refuge Crossing
Date: Wednesday, March 4, 2026 4:25:51 PM
Attachments:

Sabrina and Kendra,

Following our conversations regarding the potential of a 765 kV transmission line crossing near Genoa, WI, the MariBell Project team is providing the attached formal notice of our intent to initiate a land exchange.
We look forward to scheduling a meeting at your earliest convenience to discuss the steps in this process and options for exchange parcels.

Please let me know if you have any questions.

Thank you,

Mike Peters

Michael Peters
Environmental Permitting Lead
Regional Transmission Projects
Dairyland Power Cooperative
3200 East Ave South
P.O. Box 817, La Crosse, WI 54602-0817
Phone: (608) 787-1300
Michael.Peters@DairylandPower.com

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March 4, 2026

Sent Via E-Mail
Sabrina Chandler, Manager
Upper Mississippi National Wildlife and Fish Refuge
U.S. Fish and Wildlife Service
102 Walnut Street, Suite 204
Winona, Minnesota 55987

Re: Project MariBell Request for USFWS Land Exchange

Dear Ms. Chandler:

I am writing on behalf of Dairyland Power Cooperative and GridLiance Heartland LLC (the "Companies") that are developing the proposed Project MariBell ("Project"), a 765/161 kV double-circuit transmission line from Marion, Minnesota to Bell Center, Wisconsin. The purpose of this letter is to initiate discussions with the U.S. Fish & Wildlife Service ("Service") regarding consideration of an exchange of lands to accommodate the Project's potential crossing of the Upper Mississippi River National Wildlife and Fish Refuge (Refuge).

Project Need

The Project is part of a portfolio of transmission upgrades identified by the Midcontinent Independent System Operator ("MISO") through the second phase of its Long-Range Transmission Planning ("LRTP") process, MISO LRTP Tranche 2.1 ("Tranche 2.1"), that will increase system efficiency and reliability, reduce congestion, and provide economic benefits to the region.[1] The LRTP is a multi-year, multi-phase effort to identify necessary regional transmission grid upgrades to cost-effectively maintain system reliability in the face of changing energy supply needs. In short, the LRTP is designed to enable the transmission grid to move more cost-effective electricity farther distances and from different generation sources to continue to serve electrical needs 24 hours a day, 7 days a week, 365 days a year.

[1] Northern States Power Company d/b/a Xcel Energy and Dairyland Power Cooperative, *Joint Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Gopher to Badger Link Project*, MPUC Docket No. ET3, E002/CN-25-121 (February 2026).

In 2024, MISO approved Tranche 2.1, which establishes a new 765-kV "backbone" across the Midwest and includes 24 projects totaling approximately 3,600 miles of new and upgraded transmission infrastructure. MISO followed an extensive stakeholder process, spending more than 40,000 staff hours, facilitating more than 300 meetings, and capturing feedback to arrive at the LRTP Tranche 2.1 Portfolio. The Project is part of a group of actions intended to address reliability and energy delivery needs specific to southern Minnesota, eastern North Dakota, eastern South Dakota, northern and central Iowa, and western Wisconsin. This region is bisected by the Mississippi River and the Upper Mississippi River National Wildlife and Fish Refuge ("Refuge"). The Project is proposed to be in service by 2034, as stipulated in the LRTP.

Project Approach

In general, MISO prioritizes project approaches that can be built through upgrades to or co-location with existing facilities to maximize the use of previously disturbed areas and minimize the acquisition and establishment of new rights-of-way (ROW). The Companies explored existing corridors and associated Mississippi River crossings and identified a suitable corridor that includes two existing 161-kV transmission lines, which cross the Refuge and the Mississippi River in southeast Minnesota and southwest Wisconsin near the Wisconsin town of Genoa. Recognizing the combined priorities of co-location and meeting the stipulated in-service date, the Companies identified a land exchange as a suitable approach to establishing a Project crossing in a timely manner.

Refuge Land Exchange

The Companies recognize the Service must adhere to specific policies when considering a land exchange, including the net benefit of such an exchange to the purposes for which the Refuge was established. As set forth in the 1997 National Wildlife Refuge System Improvement Act, the Secretary of the U.S. Department of the Interior has broad discretion to "[a]cquire lands or interests therein by exchange for acquired lands or public lands, or for interests in acquired or public lands, under his jurisdiction which he finds to be suitable for disposition."[2] The Companies recognize the Service must adhere to specific policies when considering a land exchange, including that any land exchange must be a "net benefit" to the Refuge. Service policies applicable to land exchanges identify a range of considerations for determining whether an exchange will provide a net benefit (e.g., property value, considerations favoring exchanges in fee over conveyance of use rights, acquisition of land with higher habitat value, etc.). An exchange of Refuge land with an existing ROW and associated impacted habitat for higher value habitat lands may fit these criteria.

[2] 16 U.S.C. § 668dd(b)(3).

Next Steps

In preparing an application for a land exchange for the Project, the Companies propose to begin the following steps in coordination with the Service:

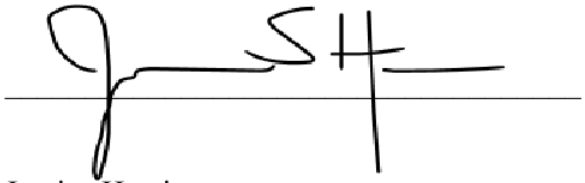
1) Identify parcels located within the prescribed Refuge Acquisition Boundary that are likely to provide a net benefit.
2) Conduct a resource inventory and cadastral review of Dairyland Power Cooperative's existing 161 kV ROW.
3) Inventory resources on parcels identified for potential exchange.
4) Obtain feedback from the Service on the suitability of potential exchange parcels.
5) Identify measures the Companies would commit to in managing the transferred ROW (e.g., vegetation management protocols identified by the Service, resource protection measures, continued Refuge access to ROW).
6) Submit an application for exchange of identified parcels.

Please do not hesitate to contact us with any questions about this letter. You can reach us through Michael Peters by email at Michael.Peters@DairylandPower.com or phone at (608) 787-1300. We look forward to receiving your feedback on these proposed next steps for consideration by the Service of a land exchange.

Sincerely,



Clay DeWitt
Manager, Regional Transmission Projects
Dairyland Power Cooperative



Jessica Hewitt
Senior Director, Project Execution
GridLiance Heartland

From: Michael Peters
To: Chandler, Sabrina; Pednault, Kendra
Cc: Eric Myers; Stephanie Strength; Rob Maly; Dylan Felten; Coffield, Lucas
Subject: Prep Documents for Monday"s Call
Date: Friday, March 20, 2026 3:59:33 PM
Attachments:

Sabrina and Kendra,

Per earlier conversations, I have attached fact sheets for your review for the Existing Refuge right-of-way, and one example of potential lands at Jack Oak Island in Pool 11. These are being sent so the two of you can have a chance to do a quick review prior to our meeting in hopes of guiding our conversations a little.

Let me know if you have any questions or comments, otherwise we obviously plan to discuss further Monday.

Thanks, and have a great weekend.

Mike Peters

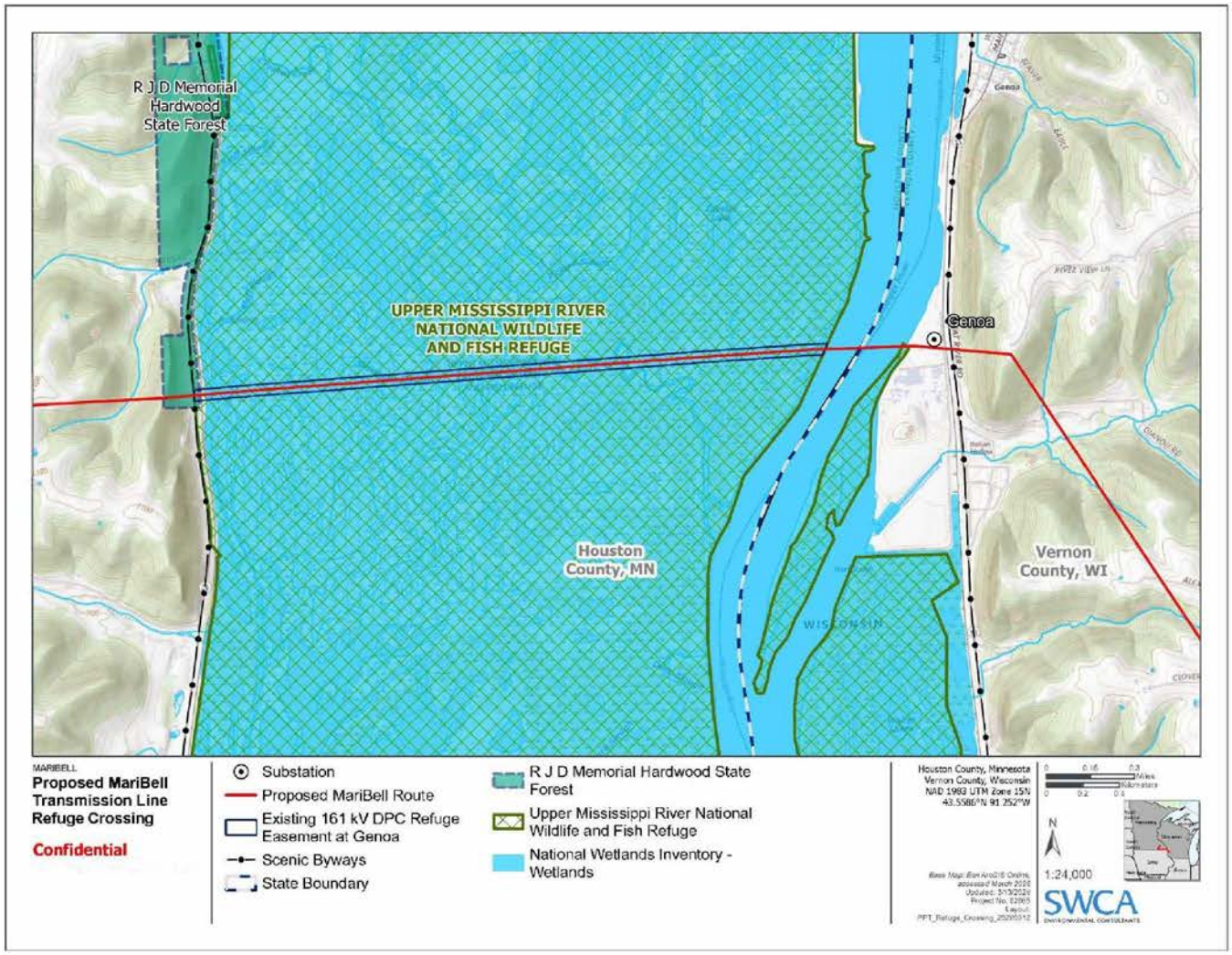
Michael Peters
Environmental Permitting Lead
Regional Transmission Projects
Dairyland Power Cooperative
3200 East Ave South
P.O. Box 817, La Crosse, WI 54602-0817
Phone: (608) 787-1300
Michael.Peters@DairylandPower.com

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MariBell 765-kV/161-kV Transmission Line Project
Genoa River Crossing Existing Easement Fact Sheet



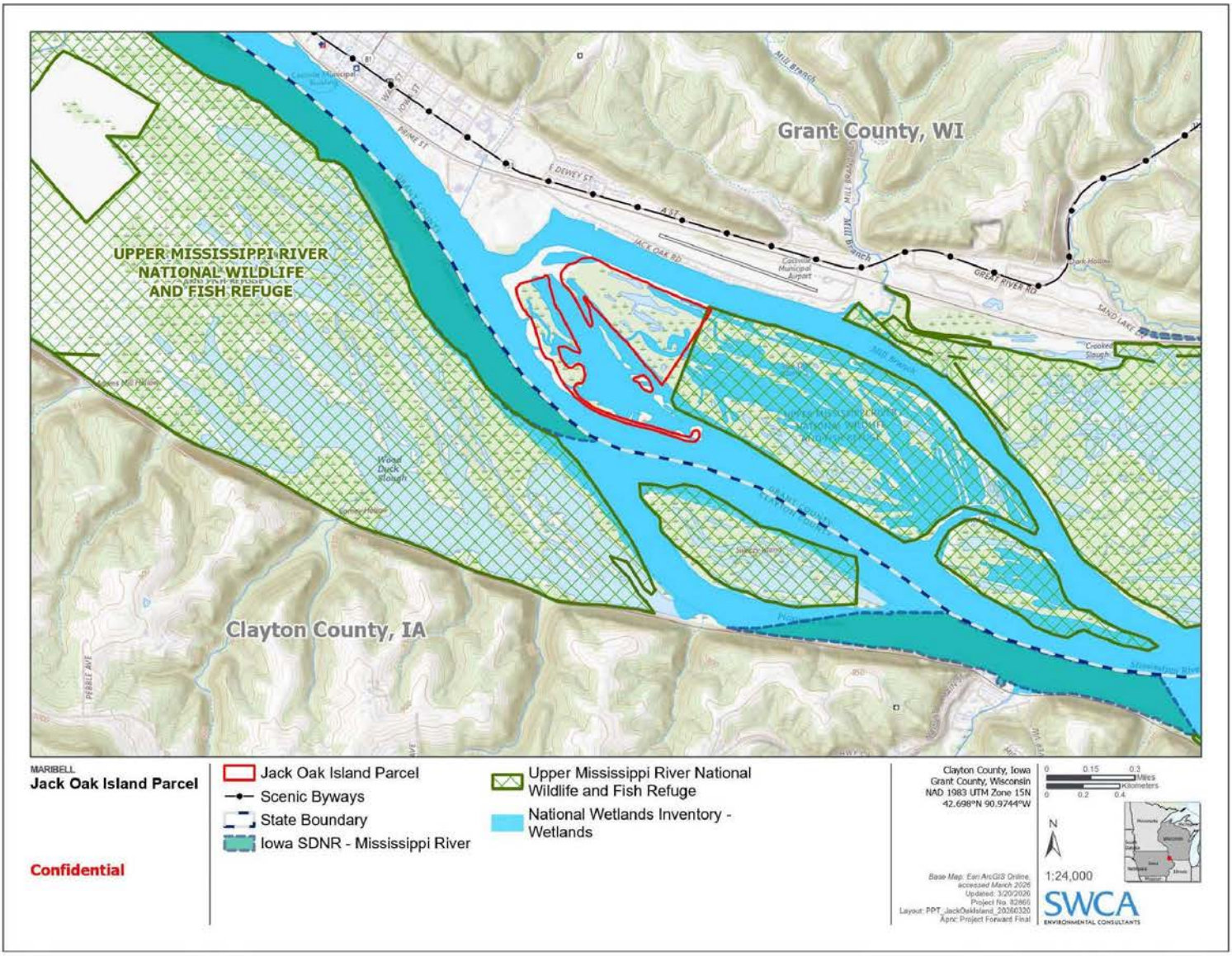
GENOA RIVER CROSSING FACT SHEET

MariBell 765-kV/161-kV Transmission Line Project (MariBell Project or Project)
Genoa River Crossing Existing Easement

Genoa River Crossing Existing Easement	The Genoa River Crossing Existing Easement (Existing Easement) held by Dairyland Power Cooperative (DPC) is an approximately 40-acre area that encompasses a 200-foot right-of-way (ROW) with two existing DPC-owned 161-kilovolt (kV) transmission lines (existing 161-kV). The Existing Easement is in Houston County, Minnesota, approximately 3 miles south of the town of Reno, Minnesota, and is located within the Upper Mississippi River National Wildlife and Fish Refuge, which is owned or managed by the U.S. Fish and Wildlife Service (USFWS). The approximate center of the Existing Easement is located at 43.560004°, -91.258441°, with the eastern edge bordered by the Mississippi River.
U.S. Fish and Wildlife Refuge	The Existing Easement is located within the Upper Mississippi River National Wildlife and Fish Refuge.
Genoa River Crossing Existing Easement Resources	The Existing Easement is within the Reno Bottoms Habitat Rehabilitation and Enhancement Project area. The Existing Easement is primary forested with emergent herbaceous wetlands, open water, and woody wetlands. The following six federally listed and proposed for listing species have the potential to occur within the Existing Easement: tricolored bat (*Perimyotis subflavus*; proposed endangered), whooping crane (*Grus americana*; experimental population), Higgins eye pearlymussel (*Lampsilis higginsii*; endangered), salamander mussel (*Simpsonaias ambigua*; endangered), sheepnose mussel (*Plethobasus cyphyus*; endangered), and monarch butterfly (*Danaus plexippus*; proposed threatened). The area within and around the Existing Easement is a low-lying, flat river plain within the Mississippi River corridor with sinuous tributary water courses throughout. Existing infrastructure is within the viewshed of the Existing Easement.

JACK OAK ISLAND FACT SHEET

MariBell 765-/161-kV Transmission Line Project
Jack Oak Island Parcel – Pool 11



JACK OAK ISLAND FACT SHEET

MariBell 765-kV/161-kV Transmission Line Project (MariBell Project or Project)
Jack Oak Island Parcel – Pool 11

Jack Island Oak Parcel	Jack Oak Island Parcel (or Parcel) is an approximately 85-acre privately-owned parcel. The Parcel is located on the northwest corner of Jack Oak Island, which is situated in the Mississippi River as it runs between Wisconsin and Iowa. Jack Oak Island is located in Grant County, Wisconsin, less than 1 mile south of the town of Cassville, Wisconsin. The approximate center point of the Parcel is located at 42.701587°, -90.974575°.
U.S. Fish and Wildlife Refuge	The Upper Mississippi River National Wildlife and Fish Refuge, which is owned or managed by the U.S. Fish and Wildlife Service (USFWS), is immediately adjacent to the east of the Jack Oak Island Parcel.
Jack Oak Island Parcel Resources	The Jack Oak Island Parcel is primarily forested, with woody wetlands prevalent across most of the Parcel. The Parcel is bisected by the Mississippi River. The following five federally listed and proposed for listing species have the potential to occur on the Jack Oak Island Parcel: Northern long-eared bat (*Myotis septentrionalis,* federally endangered), tricolored bat (*Perimyotis subflavus*; proposed endangered), whooping crane (*Grus americana*; experimental population), eastern massasauga (*Sistrurus catenatu,* federally threatened), and monarch butterfly (*Danaus plexippus*; proposed threatened). The area surrounding the Parcel includes tall deciduous trees, shrubs, and marshes, with vibrant seasonal color changes. The viewshed includes a river view but is interrupted by barge traffic, existing transmission lines, and nearby residential development.
Jack Oak Island Summary	High value habitat for threatened and endangered species would be protected, as would an additional 1.8 miles of shoreline of the Mississippi River. The parcel acquisition would enhance connectivity to existing USFWS Refuge lands. The Jack Oak Island Parcel would reduce fragmentation of the Upper Mississippi River National Wildlife and Fish Refuge.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Upper Mississippi River National Wildlife and Fish Refuge
102 Walnut Street, Suite 204
Winona, Minnesota 55987

April 1, 2026

Mr. Clay DeWitt
Manager, Regional Transmission Projects
Dairyland Power Cooperative
3200 East Ave South
P.O. Box 817, La Crosse, WI 54602-0817

Dear Mr. DeWitt,

Thank you for your letter dated March 4, 2026, regarding a potential land exchange to facilitate the Project MariBell transmission line. In your letter you describe next steps for this proposal, and I look forward to hearing more details soon.

Sincerely,

SABRINA CHANDLER

Digitally signed by SABRINA CHANDLER
Date: 2026.04.01 15:43:35 -05'00'

Sabrina Chandler
Refuge Manager

Cc: Jessica Hewitt, GridLiance Heartland
Micheal Peters, Dairyland Power Cooperative

From: Chandler, Sabrina
To: Michael Peters; Pednault, Kendra
Cc: Clay DeWitt; Hewitt, Jessica; Coffield, Lucas
Subject: Re: [EXTERNAL] MariBell Transmission Line Potential Refuge Crossing
Date: Wednesday, April 1, 2026 4:19:13 PM
Attachments:

Mike,
Please see attached response. We look forward to exploring this proposal further. As this is transmitted via email, I don't intend to snail mail but can if you prefer.

Sabrina_Chandler |Refuge Manager/Area Supervisor|Upper Mississippi River National Wildlife and Fish Refuge|102 Walnut Street, Suite 204|Winona, MN 55987|507-458-0144

From: Michael Peters <Michael.Peters@DairylandPower.com>
Sent: Wednesday, March 4, 2026 4:21 PM
To: Chandler, Sabrina <sabrina_chandler@fws.gov>; Pednault, Kendra <Kendra_Pednault@fws.gov>
Cc: Clay DeWitt <Clay.DeWitt@DairylandPower.com>; Hewitt, Jessica <jessica.hewitt@nexteraenergy.com>; Coffield, Lucas <lucas.coffield@nexteraenergy.com>
Subject: [EXTERNAL] MariBell Transmission Line Potential Refuge Crossing

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Sabrina and Kendra,

Following our conversations regarding the potential of a 765 kV transmission line crossing near Genoa, WI, the MariBell Project team is providing the attached formal notice of our intent to initiate a land exchange.
We look forward to scheduling a meeting at your earliest convenience to discuss the steps in this process and options for exchange parcels.

Please let me know if you have any questions.

Thank you,

Mike Peters

Michael Peters
Environmental Permitting Lead
Regional Transmission Projects

From: Stephanie Strength
To: Pednault, Kendra; Chandler, Sabrina
Cc: Eric Myers; Rob Maly; Coffield, Lucas; Michael Peters
Subject: MariBell Meeting Notes and Letter Identifying Parcels for Exchange
Date: Friday, June 5, 2026 2:36:19 PM
Attachments:

Sabrina,

Please see the attached notes summarizing the April meeting on the MariBell Project, provided for your confirmation or clarification.

Additionally, please see the attached letter from the MariBell Project applicants. The letter identifies the parcels identified for potential land exchange.

We look forward to your comments. Please reach out with any questions.

Regards,

Stephanie Strength
Senior Environmental Planner
New Mexico – Four Corners

SWCA Environmental Consultants
130 Rock Point Drive, Suite A
Durango, CO 81301
C 202.297.4964



May 22, 2026

Sent Via E-Mail
Sabrina Chandler, Manager
Upper Mississippi National Wildlife and Fish Refuge
U.S. Fish and Wildlife Service
102 Walnut Street, Suite 204
Winona, Minnesota 55987

Re: Project MariBell Identification of Parcels for USFWS Land Exchange

Dear Ms. Chandler:

I am writing on behalf of Dairyland Power Cooperative (DPC) and GridLiance Heartland LLC (the "Companies") that are developing the proposed Project MariBell ("Project"), a 765/161 kV double-circuit transmission line from Marion, Minnesota to Bell Center, Wisconsin. The purpose of this letter is to continue discussions with the U.S. Fish & Wildlife Service ("Service") regarding consideration of an exchange of lands to accommodate the Project's potential crossing of the Upper Mississippi River National Wildlife and Fish Refuge (Refuge).

Prior Correspondence

The previous letter initiating the exchange (dated March 4, 2026) provides the purpose of the Project, the Project approach and the specific policies relating to land exchanges for the Refuge. The initiating letter also identified the Companies' proposed next steps in the land exchange process, with the initial step being the subject of this letter.

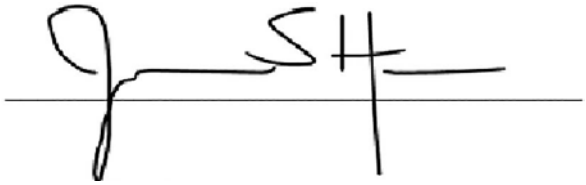
Identification of Parcels for Exchange

The Companies' have identified parcel(s) located within the prescribed Refuge Acquisition Boundary that are likely to provide a net benefit to the Refuge, in exchange for the existing DPC 161kV Right-of-Way at Genoa, WI. The parcel for proposed acquisition is the northern portion of Jack Oak Island in Grant County, WI.

Please do not hesitate to contact us with any questions about this letter. You can reach us through Michael Peters by email at Michael.Peters@DairylandPower.com or phone at (608) 787-1300. We look forward to receiving your feedback on these proposed next steps for consideration by the Service of a land exchange.

Sincerely,





Clay DeWitt
Manager, Regional Transmission Projects
Dairyland Power Cooperative

Jessica Hewitt
Senior Director, Project Execution
GridLiance Heartland

Minnesota Board of Water and Soil Resources

From: Kristin Lenz
To: "VanThuyne, Dusty (He/Him/His) (BWSR)"
Cc: "Michael Peters"; Dylan Felten; Coffield, Lucas; Dan Ryan
Subject: Gopher to Badger Link Project Introduction - BWSR Conservation Easements
Date: Wednesday, August 5, 2026 1:30:00 PM
Attachments:

Good afternoon,

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin (please see prior email below).

At this stage in Project development, the Applicants are developing a Route Permit application to submit to the Minnesota Public Utilities Commission in fall 2026. Through that process, the Applicants have identified three Minnesota Board of Water and Soil Resources (BWSR) conservation easements that would be crossed by the preliminary right-of-way (see Table 1 below). We would like to meet with you to review these easements, make sure we have the correct easement boundaries, understand any potential restrictions associated with those easements, and the authorization process. All of these easements are along Dairyland's existing 161 kV transmission line, but the right-of-way would be expanded at these crossings to accommodate the new 765 kV / 161 kV double circuited transmission line.

TABLE 1
Gopher to Badger Link Project
Conservation Easements Crossed by the Preliminary Right-of-Way

Managing Agency	Easement Type	County	Right-of-Way (acres)	Easement No.
Segment 2				
BWSR	RIM 4 – Wetland Restoration	Mower	4.8	50-02-94-01
BWSR	RIM A - Marginal Cropland - Perpetual	Houston	1.2	28-03-09-06
BWSR	PWP	Houston	3.3	28-03-93-03-B
TOTAL			**10.6**	

Would you be able to provide some good dates or times to meet with you and your staff?

Please reach out with any questions or concerns.

Thank you!

Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Kristin Lenz
Sent: Friday, May 1, 2026 4:53 PM
To: VanThuyne, Dusty (He/Him/His) (BWSR) <dusty.vanthuyne@state.mn.us>
Cc: 'Michael Peters' <michael.peters@dairylandpower.com>; 'Heine, Ellen L' <ellen.l.heine@xcelenergy.com>
Subject: Gopher to Badger Link Project Introduction - Route Options

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com



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Minneapolis, MN 55414
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Gopher to Badger Link
Minnesota Board of Water & Soil Resources (BWSR)
Project Introduction Meeting
August 21, 2026

Participants:

Karlie Swenson, Minnesota Board of Water & Soil Resources (BWSR)
Peter Jordet, BWSR
Michael Peters, Dairyland Power Cooperative (Dairyland)
Dylan Felten, Dairyland
Lucas Coffield, GridLiance Heartland (GridLiance)
Kristin Lenz, Merjent, Inc. (Merjent)
Dan Ryan, Merjent

Action items are identified in red font.

Project Overview

- Dairyland and Xcel Energy have prepared a Route Permit Application which is currently being reviewed by the Minnesota Public Utilities Commission (MPUC).
- Dairyland and Xcel Energy anticipate filing the official application after the MPUC review tentatively in October 2026.
- Dairyland and Xcel Energy assessed a Proposed Route or Route Width within the Route Permit Application, which is a corridor ranging from 1,500 feet up to 1.25 miles wide within which the Proposed Alignment and associated right-of-way may be located. Dairyland and Xcel Energy have requested this flexibility to site the centerline to avoid impacts to sensitive resources and allow for input from landowners, agencies, etc.
- After the Route Permit is submitted, the MPUC will start the scoping process and will hold informational hearings within the Project area. That may result in suggestions of route alternatives.
- The MPUC will then develop an Environmental Impact Statement that assesses the environmental and human impacts associated with the Proposed Route, and potentially other route alternatives.
- The MPUC will ultimately select the Proposed Route; it is possible that there will be changes to the Proposed Route submitted in the initial Route Permit Application.
- Dairyland and Xcel Energy anticipate that the Route Permit would be issued in Q1 2028. Dairyland would initiate the official consultation process with BWSR for any easement crossings after that.
- Swenson requested that Dairyland provide the Proposed Route, alignment and right-of-way shapefiles to BWSR for review. At this time, BWSR will focus their review on the three easement crossings along the Segment 2 right-of-way (see Table 1 below); not the full Proposed Route.

TABLE 1
Gopher to Badger Link Project
Conservation Easements Crossed by the Preliminary Right-of-Way

Managing Agency	Easement Type	County	Right-of-Way (acres)	Easement No.
Segment 2				
BWSR	RIM 4 – Wetland Restoration	Mower	4.8	50-02-94-01
BWSR	RIM A - Marginal Cropland - Perpetual	Houston	1.2	28-03-09-06
BWSR	PWP	Houston	3.3	28-03-93-03-B
TOTAL			**10.6**	

Gopher to Badger Link
Minnesota Board of Water & Soil Resources (BWSR)
Project Introduction Meeting
August 21, 2026

Easement Process

- Swenson noted that BWSR was able to track down Dairyland's existing 161 kilovolt (kV) easements for 2 of the 3 crossings. Felten indicated that there are existing easements for all three crossings. Dairyland will provide these to BWSR for review.
- Swenson indicated that there may be two different easement processes depending on the easement type and associated restrictions:
    - Expansion of the existing easement through a Special Use Permit (SUP)
        - Swenson indicated that in this circumstance, if the prior easement was a blanket easement, BWSR will request a confined easement specific to the right-of-way width
        - BWSR may include conditions with the SUP, such as using native grass forb mix during restoration
    - Easement Alteration, which could include a full or partial release of the existing BWSR easement (see enclosed *Conservation Easement Alteration Requests and Board Policy*).
        - The existing transmission right-of-way easement is generally 80 to 100 feet wide. The new easement would be expanded to 200 or 250 feet. BWSR may prefer a full release since it would be more than double the current width, but will evaluate this further.
- Swenson explained that compensation is required for alterations at two times the Reinvest in Minnesota (RIM) rate based on township-specific valuations. To provide an example, on another project, they are working through a 5-acre release with approximately $90,000 release value. Compensation varies depending upon the location, what that easement was originally (e.g., farmland), and what the easement is managed for (e.g., grassland, forest).
- State and federal funding is often associated with these easements and approval from these entities would be required for alterations. The review timeframe varies depending on the state or federal entity. BWSR will review these easements to determine if there is any state or federal funding so that review period can be built into the Project timeline.
- Swenson also inquired about whether Dairyland uses bird diverters, noting that a couple of the easements are wetland easements. Peters indicated that Dairyland follows Avian Power Line Interaction Committee (APLIC) guidelines and will work with agencies, including BWSR, to identify locations where diverters are needed.
- Lenz requested that BWSR provide a preliminary review of the Project right-of-way crossings of the easements. Dairyland is looking for a general understanding of the process, and also wants to make sure that it is feasible to cross the easements. Dairyland would not be prepared to start the easement process until after the Route Permit is issued.
- Swenson indicated that BWSR would only look at the right-of-way crossings at this time in case there were further future changes to the alignment as part of the MPUC process, and BWSR will provide a summary of the vegetation management restrictions and funding sources for these easements.
- Swenson also explained that BWSR generally would not start the easement process until after Dairyland had obtained easements from the landowners.

Conservation Easement Alteration Requests and Board Policy

December 20, 2017

RIM Reserve Rule Affecting Alteration Requests

MN Rule 8400.3610 - Alteration, Release or Termination of Conservation Easements

The Board may alter, release, or terminate a conservation easement after consultation with the commissioners of agriculture and natural resources. The Board may alter, release, or terminate an easement only if the Board determines that the public interests and general welfare are better served by the alteration, release, or termination.

The Board must be provided the following information at least 30 days prior to a Board meeting, before the Board will consider a request to alter, release, or terminate a conservation easement:

A. a copy of the letter from the landowner to the district Board justifying the change and identifying how the public interest and general welfare will be better served;
B. a letter from the district Board recommending either approval or disapproval of the proposed change;
C. a letter from the Department of Natural Resources area wildlife manager recommending either approval or disapproval of the proposed change; and
D. other supporting documents, including:
    1) an aerial photo identifying the requested change;
    2) a soil survey map of the area;
    3) cropping history information; and
    4) other pertinent documentation that will support the request.

The Board reserves the right to require special provisions to ensure at least equal resource value as a condition of approving the request. The Board must be compensated by the landowner for all damages and loss of benefits to the conservation easement and the Board may also require reimbursement for administrative expenses and costs incurred in the alteration, release, or termination of a conservation easement.

Policy Developed by RIM Committee and adopted by the BWSR on 12/20/2017

This policy applies to all state RIM, PWP and CREP easements currently in place and all future state conservation easement acquisitions. The purpose of this policy is to provide a framework for the BWSR Board and staff on how to implement MN Rule 8400.3610 to ensure consistent and fair treatment of easement alteration requests, conservation benefits are not diminished, and ensure that rule requirements are met.

All easement alteration requests that come to BWSR will be accompanied by a $500 processing fee per easement. Checks should be made payable to the BWSR. For alterations where actual costs to amend the easement exceed $500 the Board reserves the right to charge the applicant the actual cost.

Public benefitted projects -
Easement staff has the authority to tentatively approve of releases for public infrastructure projects. However, releases are not considered final until after the release request is presented to and approved by the Board and all fees have been paid.

In addition to the fee as outlined above, public entities must pay:

1) Two times the current RIM payment rate for acres released, and
2) An amount equal to all state funds dispersed as reimbursement for costs incurred to establish cover on the land being released.

Private landowner requests

All alteration requests that come to the BWSR must contain all the information items requested in Section 8400.3610 of RIM Reserve Rule (items A – D as listed above), plus the $500 per easement processing fee in the form of a check made payable to the BWSR.

All requests must also meet the following conditions for BWSR approval:

1) The resource protection, conservation and habitat benefits for which the easement was originally acquired will remain the same or be enhanced by the proposed alteration. For example;
   - restored wetland acres will not be drained or filled by the proposal
   - riparian buffers will be preserved or enhanced
   - easement configuration will preserve or enhance wildlife benefits (larger blocks of habitat, not fractured puzzle-like boundaries).

2) Replacement acres will increase by a minimum factor as follows:
   Released cropland acres replaced with cropland acres: A minimum of 2:1 (replacement acres to released acres)

   Released cropland acres replaced with non-cropland acres: A minimum of 4:1 (replacement acres to released acres)

   Released non-cropland acres to non-cropland acre: A minimum of 2:1 (replacement acres to released acres)

   Released non-cropland acres to cropland acre: A minimum of 2:1 (replacement acres to released acres)

3) Replacement cropland acres proposed as replacement acres must meet crop history requirements, cropped 2 of last 5 years.

4) Replacement acres should be adjacent to or as near as possible to the existing easement.

5) The ratios above may, in rare circumstances, be altered based upon a best professional judgement recommendation by easement staff that the conservation benefits of the replacement acres significantly outweigh the conservation benefits being impacted.

6) Landowners will be required to pay necessary title insurance and recording fees, and all costs associated with establishment of conservation cover practices on replacement acres according to an approved conservation plan.

Meeting the criteria outlined above for private requests does not guarantee that the Board will approve of the request for release and alteration of a conservation easement.

From: Swenson, Karli (BWSR)
To: Kristin Lenz; Jordet, Peter (BWSR)
Cc: Michael Peters; Dylan Felten; Coffield, Lucas; Dan Ryan; Minnesota G2BL MN Tribe Agency Correspondence
Subject: Re: EXTERNAL: Re: Gopher to Badger Link Project Intro - BWSR
Date: Monday, August 31, 2026 3:51:56 PM
Attachments:

Good afternoon all,

After our preliminary review, we have determined the following:

Easement 50-02-94-01:

- The proposed ROW will overlap ~4.8ac of the RIM easement (2.4 existing, 2.4 new)
- Conservation practices in the ROW are restored wetlands and a grass/forb planting
- We handle this one with a Special Use Authorization that will leave both easements in place, and require re-seeding of any disturbed areas of the conservation easement after construction

Easement 28-02-09-06:

- The proposed ROW will overlap ~1.4ac of the RIM easement (0.7 existing, 0.7 new)
- Conservation practice in the ROW is a native grass planting
- We can handle this one with a Special Use Authorization that will leave both easements in place, and require re-seeding of any disturbed areas of the conservation easement after construction

Easement 28-03-93-03:

- The proposed ROW will overlap 3.3 acres of the RIM easement
- Conservation practice in the ROW is protection of existing trees
- We will require an Easement Alteration Request to release the ROW from the RIM easement, since the conservation practice cannot be maintained according to the RIM conservation plan.
- We propose releasing the entirety of the 3.3 acre ROW from the easement. (The existing utility easement did not show up on our title work for this easement, and appears it was never recorded).
- The easement alteration policy requires 2x the current RIM rate per acre released. The 2026 non-cropland rate for Winnebago township is $4474/ac. 2x 4474 = 8948/ac. The estimated cost to release 3.3 acres is $29,528.40. This is based on the 2026 RIM rates which are subject to change annually, so if you submit the easement alteration request in 2027 or 2028, this value will change.
- There is also a $1000 administrative fee for the easement alteration request.
- This is a CREP easement that also has an active CRP contract. Acres released from the RIM easement may also need to be removed from CRP, depending on FSA's rules for CREP. You will need to work with FSA on any modifications to the CRP contract that result from the RIM easement alteration.

I've attached our Easement Alteration Policy. Let me know if you have any questions at this time.

Thank you!

Karli Swenson
Conservation Easement Specialist
MN Board of Water and Soil Resources (BWSR)
St. Paul, Minnesota
Ph: 651-440-2456

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Thursday, August 27, 2026 3:01 PM
To: Swenson, Karli (BWSR) <karli.swenson@state.mn.us>; Jordet, Peter (BWSR) <peter.jordet@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Dylan Felten <Dylan.Felten@DairylandPower.com>; Coffield, Lucas <Lucas.Coffield@nexteraenergy.com>; Dan Ryan <dan.ryan@merjent.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: RE: EXTERNAL: Re: Gopher to Badger Link Project Intro - BWSR

Thank you!

Kristin Lenz
Senior Project Manager
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kristin.lenz@merjent.com

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From: Swenson, Karli (BWSR) <karli.swenson@state.mn.us>
Sent: Thursday, August 27, 2026 3:00 PM
To: Kristin Lenz <kristin.lenz@merjent.com>; Jordet, Peter (BWSR) <peter.jordet@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Dylan Felten <Dylan.Felten@DairylandPower.com>; Coffield, Lucas <Lucas.Coffield@nexteraenergy.com>; Dan Ryan <dan.ryan@merjent.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: EXTERNAL: Re: Gopher to Badger Link Project Intro - BWSR

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Thank you Kristen!

We will complete our review and get back to you soon with our preliminary findings.

Karli Swenson
Conservation Easement Specialist
MN Board of Water and Soil Resources (BWSR)
St. Paul, Minnesota
Ph: 651-440-2456

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Monday, August 24, 2026 11:59 AM
To: Swenson, Karli (BWSR) <karli.swenson@state.mn.us>; Jordet, Peter (BWSR) <peter.jordet@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Dylan Felten <Dylan.Felten@DairylandPower.com>; Coffield, Lucas <Lucas.Coffield@nexteraenergy.com>; Dan Ryan <dan.ryan@merjent.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: Gopher to Badger Link Project Intro - BWSR

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Good morning all,

Thank you again for meeting with us last week. Attached are the shapefiles for the:

- Proposed Route (Route Width) – varies from 1,500 feet to 1.25 miles within which the transmission line centerline and associated right-of-way can move to avoid sensitive resources, based on landowner input, etc.
- Proposed Alignment
- Proposed Right-of-Way

As discussed, these are preliminary and there may be changes as we progress through the MPUC process. We discussed during the meeting that you would focus your review on any potential BWSR easements crossed by the Proposed Alignment and Right-of-Way. Can you also confirm that we have not missed any crossings?

We've also attached Dairyland's existing easements for the crossings of BWSR easements along their 161 kV transmission line. The new line is proposed to use this same corridor and

the new 765 kV and existing 161 kV transmission lines will be double circuited on new structures. This will also require an expansion of the right-of-way generally to 200 or 250 feet.

Please reach out with any questions or concerns!

Thank you,
Kristin

Kristin Lenz
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Minnesota Department of Agriculture

From: Kristin Lenz
To: "Roos, Stephan (MDA)"
Cc: "Michael Peters"; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence
Subject: RE: Gopher to Badger Link Project Update - draft AIMP for review
Date: Thursday, October 22, 2026 12:09:00 PM
Attachments:

Good afternoon Stephan,

Dairyland and Xcel Energy (the Applicants) have prepared a draft Agricultural Impact Mitigation Plan (AIMP) for inclusion in the Minnesota Public Utilities Commission (MPUC) Route Permit Application that the Applicants are planning on filing soon for the Gopher to Badger Link Project (details below). We wanted to provide you with an advance opportunity to review the draft AIMP, attached. Please let us know if you have any feedback or concerns or would like to further discuss with the Applicants.

Thank you,
Kristin

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From: Kristin Lenz
Sent: Wednesday, August 12, 2026 12:56 PM
To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: Gopher to Badger Link Project Update

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the

Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

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Minnesota Department of Health

From: Friello, Allison (She/Her/Hers) (MDH) <Allison.Friello@state.mn.us>
Sent: Thursday, May 7, 2026 12:43 PM
To: Kristin Lenz <kristin.lenz@merjent.com>; Strommer, Amanda (MDH) <amanda.strommer@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Clemens-Billaigbakpu, Yarta (MDH) <yarta.clemens-billaigbakpu@state.mn.us>; Hanson, Scott.J (MDH) <Scott.J.Hanson@state.mn.us>; Richter, Dereck (He/Him/His) (MDH) <dereck.richter@state.mn.us>; danielle.nielsen@state.mn.us; Bell, David (MDH) <david.bell@state.mn.us>
Subject: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options

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Kristin, Michael, and Ellen

The proposed routes intersect the Stewartville DWSMA (Drinking Water Supply Management Area). The route may also intersect the Harmony DWSMA, but I couldn't confirm this with the pdf map you shared. Consider re-routing to avoid these management areas. You can view or download DWSMA spatial data at these locations:
SWP Map Viewer
Drinking Water Supply Management Areas | Minnesota Geospatial Commons

Avoid placing structures in areas that would limit access to private and non-community wells.

Private well data can be accessed here:
Minnesota Well Index
Well Information from County Well Index for the General Public | Minnesota Geospatial Commons
You can request information on non-community wells (which are not on Minnesota Well Index) here:
Online Services - MN Dept. of Health

As you likely know, the proposed routes cross regions dominated by Karst geology where fractures and conduits allow surface pollutants to reach the water table quickly. Please be mindful of potential groundwater impacts as you move forward with this project.

Thank you,

Allison Friello
Hydrologist | Source Water Protection

Minnesota Department of Health
Office: 651-201-4538

DEPARTMENT OF HEALTH

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, May 1, 2026 4:56 PM
To: Strommer, Amanda (MDH) <amanda.strommer@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Clemens-Billaigbakpu, Yarta (MDH) <yarta.clemens-billaigbakpu@state.mn.us>; Hanson, Scott.J (MDH) <Scott.J.Hanson@state.mn.us>; Friello, Allison (She/Her/Hers) (MDH) <Allison.Friello@state.mn.us>; Richter, Dereck (He/Him/His) (MDH) <dereck.richter@state.mn.us>; danielle.nielsen@state.mn.us; Bell, David (MDH) <david.bell@state.mn.us>
Subject: Gopher to Badger Link Project Introduction - Route Options

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> Operations Center.

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

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Minnesota Department of Natural Resources

Gopher to Badger Link
Minnesota Department of Natural Resources (MDNR)
Project Introduction Meeting
March 4, 2026

Participants:
Mellisa Collins, Minnesota Department of Natural Resources (MDNR)
Samantha Bump, MDNR
Michael Peters, Dairyland Power Cooperative
Ellen Heine, Xcel Energy
Allison Ray, Xcel Energy
Lucas Coffield, GridLiance Heartland
Naomi Christenson, Merjent
Kristin Lenz, Merjent

Lenz presented PowerPoint presentation (attached) that provides an overview of the Gopher to Badger Link Project (Project), including discussion of the Midwest Independent System Operator (MISO) Tranche 2.1 Long Range Transmission Plan (LRTP), presentation of typical structure design, height, spans and foundation depths, anticipated MDNR permitting and coordination needs, MDNR interests within the Project area, and Project schedule.

- Project Overview
    - Collins asked about the depth of the foundations. Typical structure foundation is 25 to 65 feet, but additional geotechnical data will be needed to determine depth at each structure location. Collins asked if the depth includes the piling needs as well as foundation depths. Ray responded that additional depth may be required for the pilings, but additional geotechnical data will be needed to make those determinations.
- Anticipated Permits and Coordination
    - Collins noted a calcareous fen management plan might be required; Collins indicated that it appeared one of the routes crosses a calcareous fen near Stewartville, Minnesota along Segment 2. The MDNR identifies potential fens for further impact assessment within 5 miles of the proposed routes. Lenz indicated that she assumed that fens in proximity the proposed route would be identified during the MDNR Minnesota Conservation Explorer (MCE) online review process. Collins confirmed this is the case, but encouraged the Project to coordinate early with Keylor Andrews, the Calcareous Fen Program Coordinator (keylor.andrews@state.mn.us) early to ensure avoidance of any fens.
    - Bump reiterated that avoidance of calcareous fens is desired. Lenz clarified that avoidance means that an overhead transmission line could not span a calcareous fen. Bump and Collins confirmed and indicated that the vegetation management practices on the right-of-way through a fen are not compatible with maintaining the integrity of the fen. Further, there are typically many state-listed species within a fen.
    - The calcareous fen data is publicly available from Minnesota Geospatial Commons as a point feature.[1] To determine the boundaries of the fen, Collins recommended using the MDNR Native Plant Community layer.[2]
    - The MDNR now requests that Projects fill out the “Information Requirements of Projects near Groundwater Dependent Features” form to evaluate potential impacts to fens in proximity. Lenz indicated that some of the data for this form,

[1] https://gisdata.mn.gov/dataset/biota-nhis-calcareous-fens
[2] https://gisdata.mn.gov/dataset/biota-dnr-native-plant-comm

such as depth to foundations, may not be available during the Route Permit application process, but we can start conversations with Andrews to identify potential concerns. Collins indicated that it is important that the structure design and construction process is well understood and documented. The concern surrounding foundation and piling depths is the potential to breach a confined aquifer that provides water to the calcareous fens.

- MDNR Interests in the Project Area
    - Collins and Bump identified the following MDNR concerns associated with the Project and requested further coordination to identify potential route alternatives to avoid or minimize these impacts:
        - Viewshed impacts from public lands towards the transmission line; Collins and Bump indicated that concerned citizens have already started calling in with these concerns to nearby Wildlife Management Areas (WMAs), State Parks, and State Forests
        - Migratory bird paths – the Project bisects an Important Bird Area (IBA) at the Mississippi River and at nearby WMAs, some of which are managed for waterfowl production. Collins and Bump also indicated that concerned citizens have called in regarding these potential impacts.
        - Geology / karst is another concern from the MDNR and a Karst Contingency Plan will likely be requested by the MDNR during the Route Permit application process. Collins noted that other wind projects proposed in this area have been unsuccessful due to the geology.
        - Bump also noted that issues have come up on other transmission projects that have sited structures too close to MDNR properties that use prescribed burns; this should be taken into account when siting structures.
        - In terms of tiers of impacts, Collins noted that the Scientific Natural Area (SNA) would be at the top of the tier – MDNR typically prohibits any impacts to SNAs.
        - Bump indicated other priorities from the MDNR include co-locating with existing utility corridors and existing crossing locations.
        - Collins also indicated that the Rusty Patched Bumble Bee (RPBB) was recently uplisted to State Endangered in Minnesota (potentially effective 3/1/26). State guidance is not available yet; it is likely to be similar to the U.S. Fish and Wildlife Service (USFWS) guidance, but will be more regulated in the state. Collins assumed that bat species may also be present in the Project area.
        - Regarding the tree replacement Route Permit condition recently added by the Minnesota Public Utilities Commission on many transmission line projects, the MDNR is working with a subcommittee of the Vegetation Management Plan Working Group to provide further guidance to applicants on how to implement this condition. They are looking at the Future Forester's proposal that was used on Enbridge's Line 3 Replacement Project as an example.

Heine and Ray noted that there is less flexibility with rerouting 765 kilovolt (kV) projects relative to smaller voltage transmission lines due to the size of the structures, which limits ability to create larger angles. Further, the Project must also balance impacts to residents and other land

use activities. Collins and Bump acknowledged these limitations and appreciates the early coordination efforts to identify, avoid and/or minimize potential impacts to MDNR resources and interests.

Collins noted that Olmsted County has ordinance related to Decorah Edge, a critical geological feature.[3]

Next steps:

- Project introduction letters will be sent to the MDNR in late April/early May with maps and .kmz of the proposed route for further evaluation by the MDNR for potential concerns.
- Set up another meeting after the intro letter is sent to further discuss MDNR concerns and evaluate if route alternatives are needed to avoid / minimize impacts.

[3] https://www.olmstedcounty.gov/sites/default/files/2020-10/Chapter%203700%20Wetland%20Conservation%20Ordinance.pdf.

Gopher to Badger Link Project

Project Introduction Meeting – Minnesota Department of Natural Resources (MDNR)

Gopher to Badger Link

Xcel Energy®

DAIRYLAND POWER COOPERATIVE

Agenda

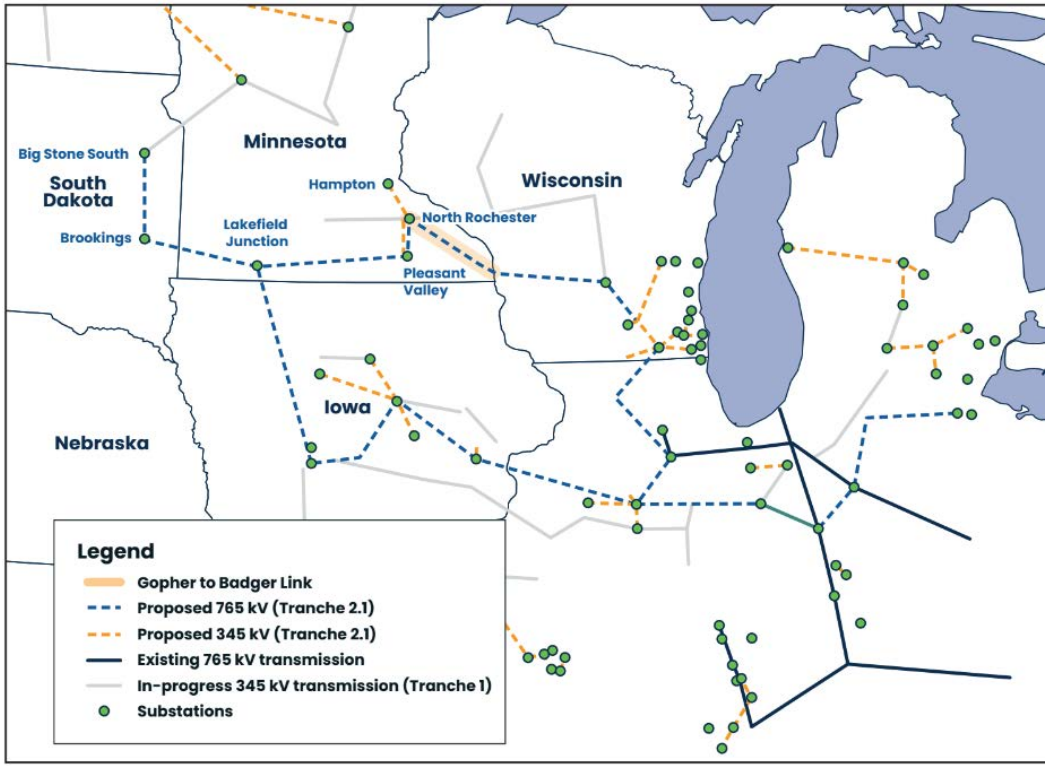
- Introductions
- Project Overview
  - MISO Tranche 2.1 Project
  - Project Description
- Anticipated Permits
- Potential MDNR Interests
- Project Timeline
- Next Steps / Info Needs?

MISO Overview

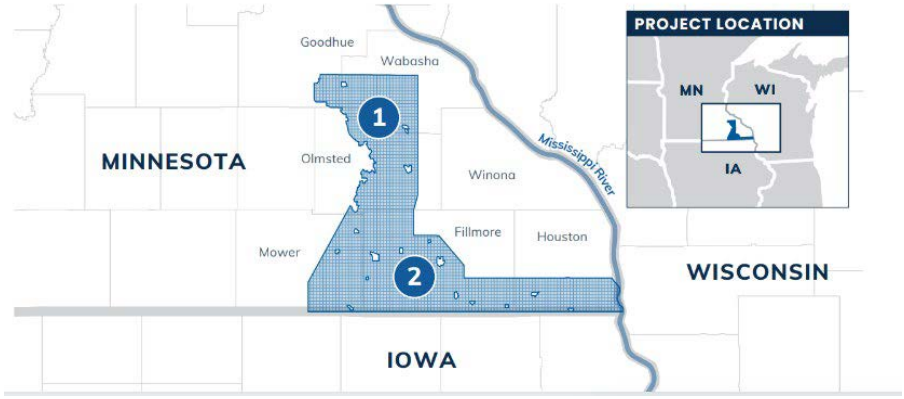
MISO conducted 2-year regional planning process to identify a portfolio of 24 transmission projects to enhance the reliability of the electric grid, improve access to remote energy resources and deliver reliable power to homes, farms and businesses through the Midwest region.

Gopher to Badger Link was identified as one of the projects in MISO's proposed Long Range Transmission Plan (LRTP).

MISO's Final Tranche 2.1 Map



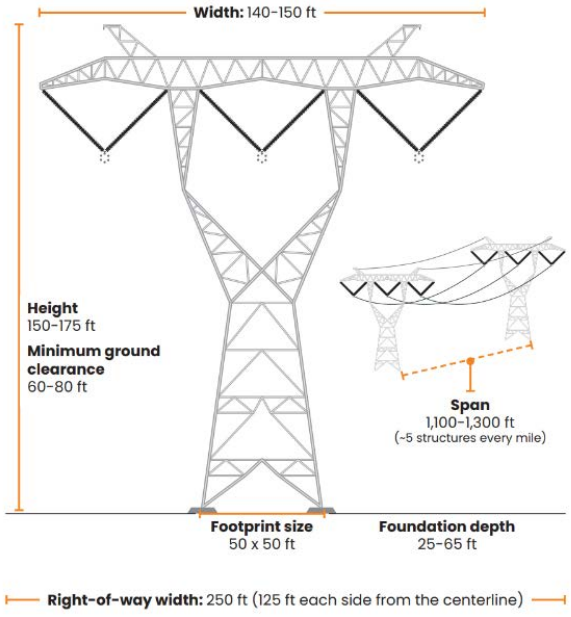
Project Overview



- North Rochester to Marion Segment (Segment 1):
  - Xcel Energy is developing approximately 35 miles of a new single circuit 765 kV transmission line from the North Rochester Substation near Pine Island to Marion, MN
- Marion to Mississippi River Segment (Segment 2):
  - Dairyland Power Cooperative is developing approximately 105 miles from Marion to the Mississippi River. This segment consists of replacing an existing 161 kV transmission line with a new 765/161 kV double-circuit transmission line

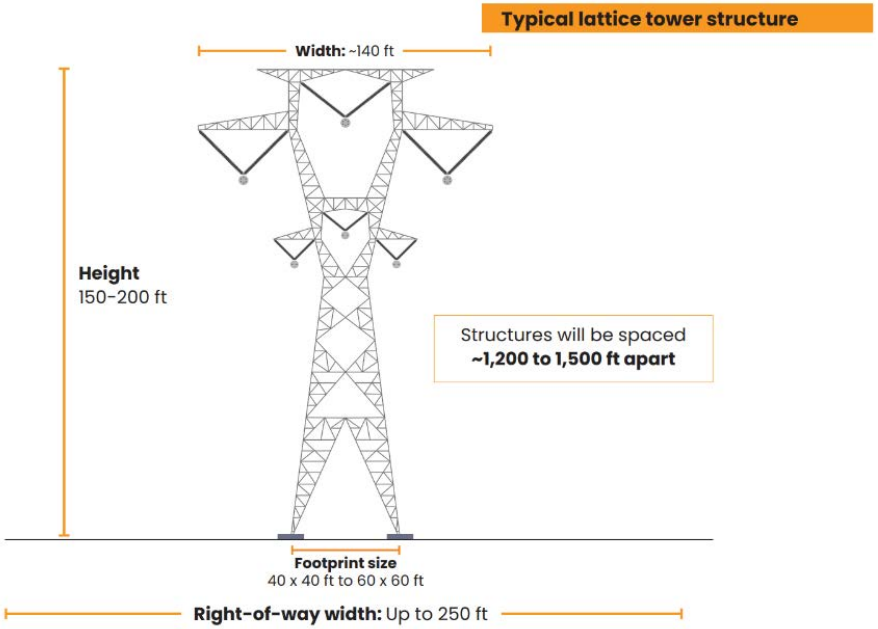
765 kV Structures

This is an example of a typical single-circuit 765 kV structure, similar to what could be used on the North Rochester to Marion segment.



NOTE: Preliminary design, not to be used for construction.

This is an example of a double-circuit 765/161 kV steel lattice structure, similar to what could be used on the MariBell segment.



NOTE: Preliminary design, not to be used for construction.

Anticipated MDNR Permits

Minnesota Department of Natural Resources – Anticipated Permits / Coordination
State Natural Heritage Review and Coordination
Utility Crossing Licenses – Public Lands
Utility Crossing Licenses – Public Waters
Work in Public Waters Permit
Water Appropriation Permits

MDNR Interests in Project Area*

Public Lands	Public Waters	Natural Resources	
Shooting Star SNA	Zumbro River	Driftless Region / karst	Sites of Biodiversity Significance
Haverhill WMA	Bear Creek	Trout streams	Native Plant Communities
Winnebago Creek Aquatic Management Area	Winnebago Creek	Calcareous fens	Old growth forest
Richard J. Dorer Memorial Hardwood State Forest	Iowa River/Little Iowa River	Snowmobile/canoe trails	Wild rice
	Mississippi River	Shooting Star State Trail	State-listed species

*This is not an exhaustive list; this will be updated based on the refined route filed with the Route Permit application.

Project Milestones

Activity	Timeline
File Certificate of Need MPUC Docket #: CN-25-121	February 6, 2026
Agency / Tribal Project Introduction Letters with Route Maps	Late April/early May 2026
Route Permit Open Houses	Week of May 5, 2026
File Route Permit Application	Fall 2026
CN / RP Order Anticipated Issuance	Q1 2028
Federal / State Permitting Obtained	2030
Start Project Construction	2031 (Segment 2) / 2033 (Segment 1)
Project Operations	2034

Next Steps / Questions?

From: mce-auto.dnr@state.mn.us on behalf of Minnesota Conservation Explorer
To: Hannah Phelps
Subject: EXTERNAL: Natural Heritage Review: Automated Results Posted
Date: Thursday, June 11, 2026 10:10:27 AM

CAUTION: This email originated from outside of Merjent.

Project: Gopher to Badger Link Transmission Line Project
Project ID: 2026-00499
Date Submitted: 06/11/2026 - 10:06

Dear Hannah Phelps,

Thank you for submitting the request for a Natural Heritage Review of Gopher to Badger Link Transmission Line Project. The automated results of the review can be found at https://mce.dnr.state.mn.us/project/gopher-badger-link-transmission-line-project-17896 by clicking on the most recent Project Report listed in the Automated Review Results table. You will need to log in to see the results.

If no further review is needed, the report will include a cover letter and map summarizing your project and a Natural Heritage Review letter.

If further review is needed, the report will include a cover letter and map summarizing your project and a notice that your project needs further review by the Natural Heritage Review Team. If your project needs further review, you will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

The Project Report can be printed for your files, and may be included in any public environmental review document and may be submitted to permitting, licensing, or other government authorities.

If you have questions about the contents of the report or need further assistance, please see the contact information contained within the report. Please send status inquiries to Review.NHIS@state.mn.us.

PLEASE DO NOT REPLY to this email, as it has been generated automatically and you will not receive a response.

Natural Heritage Review Team
Minnesota DNR

Minnesota Conservation Explorer
https://mce.dnr.state.mn.us/

DEPARTMENT OF NATURAL RESOURCES

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: Gopher to Badger Link Transmission Line Project

Project Proposer: Northern States Power Company, d/b/a Xcel Energy and Dairyland Power Cooperative

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

Project Type Activities: Wetland impacts (e.g., dewatering, tiling, drainage, discharge, excavation, fill, runoff, sedimentation, changes in hydrology);Tree Removal;Grading;Project activities/impacts will occur outside the road ROW;Project activities/impacts will occur within road ROW in areas with no previous soil disturbance;Project activities/impacts will occur within road ROW in areas with previous soil disturbance (provide map of ROW & previous soil disturbance)

TRS: T101 R10 S13, T101 R10 S14, T101 R10 S15, T101 R10 S16, T101 R10 S17, T101 R10 S18, T101 R10 S19, T101 R10 S20, T101 R10 S21, T101 R10 S22, T101 R10 S23, T101 R10 S24 +

County(s): Fillmore, Goodhue, Houston, Mower, Olmsted, Wabasha

DNR Admin Region(s): Central, South

Reason Requested: PUC Site or Route Application

Project Description: Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (Xcel Energy) and Dairyland Power Cooperative (Dairyland) propose the Gopher ...

Existing Land Uses: Land use consists of agricultural, forested, wetlands/waterbodies (crossings), and developed acres.

Landcover / Habitat Impacted: Forested and wetland/waterbodies (crossings).

Waterbodies Affected: Multiple wetlands and waterbodies will be crossed due to the extent of the proposed Project. As this Project is a transmission line build, avoidance to ...

Groundwater Resources Affected: N/A

Previous Natural Heritage Review: No

Previous Habitat Assessments / Surveys: No

SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	Comments	Tree Removal - Recommendations

Category	Results	Response By Category
Ecologically Significant Area	Needs Further Review	MBS Sites - Recommendations Potential RNC under WCA Potential Local Conservation Value NPCs - Recommendations Protected Wetlands: Calcareous Fens Potential Fen Impacts Lakes - Recommendations
State-Listed Endangered or Threatened Species	Needs Further Review	State-protected Species - Needs Further Review
State-Listed Species of Special Concern	Comments	Recommendations
Federally Listed Species	Comments	Visit IPaC for Federal Review RPBB High Potential Zone

DEPARTMENT OF NATURAL RESOURCES

June 11, 2026

Project Name: Gopher to Badger Link Transmission Line Project
Project Proposer: Northern States Power Company, d/b/a Xcel Energy and Dairyland Power Cooperative
Project Type: Utilities, Transmission (electric, cable, phone)
Project ID: MCE #2026-00499

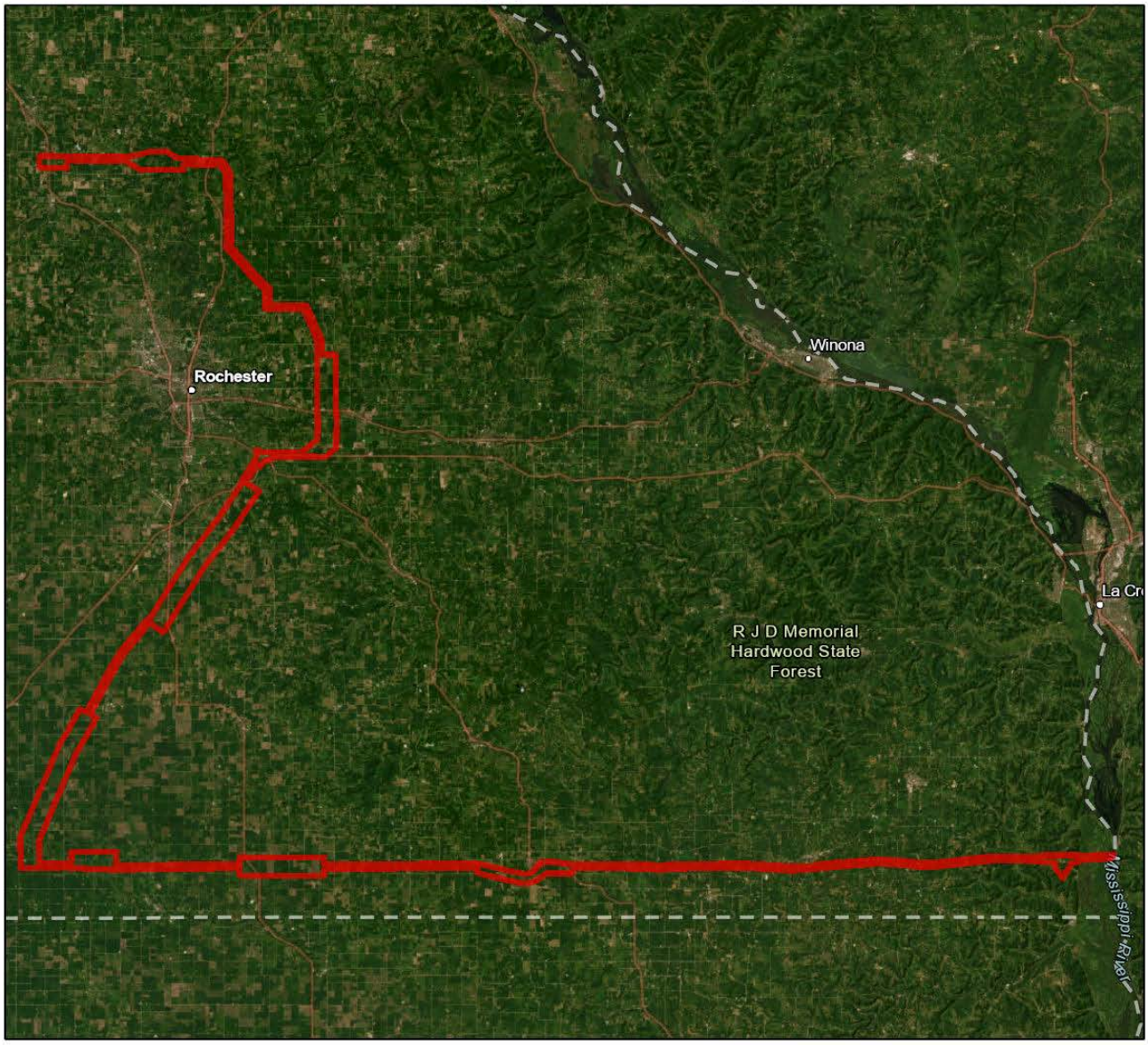
AUTOMATED RESULTS: FURTHER REVIEW IS NEEDED
As requested, the above project has undergone an automated review for potential impacts to rare features. Based on this review, one or more rare features may be impacted by the proposed project and further review by the Natural Heritage Review Team is needed. You will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

Please refer to the table on the cover page of this report for a summary of potential impacts to rare features. For additional information or planning purposes, use the Explore Page in Minnesota Conservation Explorer to view the potentially impacted rare features or to create a Conservation Planning Report for the proposed project.

If you have additional information to help resolve the potential impacts listed in the summary results, please attach related project documentation in the Edit Details tab of the Project page. Relevant information includes, but is not limited to, additional project details, completed habitat assessments, or survey results. This additional information will be considered during the project review.

Gopher to Badger Link Transmission Line Project

Aerial Imagery With Locator Map



N
W E
S

0 4.25 8.5 17 25.5 34
Miles

Project Boundary

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

Project Size (acres): 54,983.15

County(s): Fillmore, Goodhue, Houston, Mower +

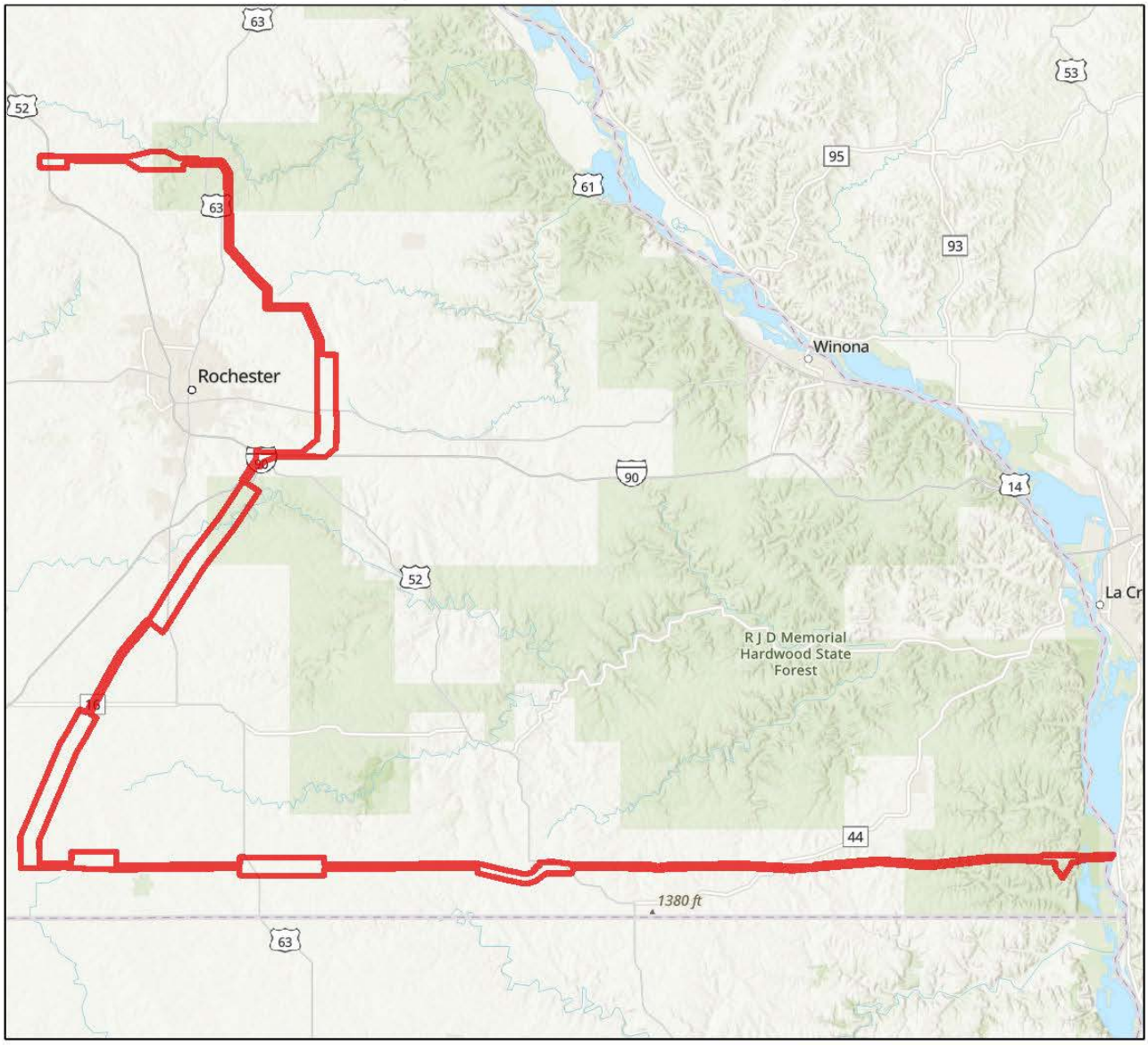
TRS: T101 R10 S13, T101 R10 S14, T101 R10 S15, T101 R10 S16, T101 R10 S17 +



Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Earthstar Geographics
MN Dept Natural Resources, Esri, TomTom, Garmin, SafeGraph, FAO, METI/

Gopher to Badger Link Transmission Line Project

USA Topo Basemap With Locator Map



N
W E
S

0 4.25 8.5 17 25.5 34
Miles

Project Boundary



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

Project Size (acres): 54,983.15

County(s): Fillmore, Goodhue, Houston, Mower +

TRS: T101 R10 S13, T101 R10 S14, T101 R10 S15, T101 R10 S16, T101 R10 S17 +

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Esri, CGIAR, USGS
MN Dept Natural Resources, Esri, TomTom, Garmin, SafeGraph, FAO, METI/

From: Kristin Lenz
To: Andrews, Keylor (DNR)
Cc: Michael Peters; Gregory, Shawn; Tremayne, Aaron; Naomi Christenson
Subject: RE: Gopher to Badger Link Project Intro - Calc Fen Discussion
Date: Friday, June 12, 2026 1:37:00 PM
Attachments:

Hi Keylor,

I just sent you an invite for next Tuesday. Also attached is the shapefile for the preliminary proposed route.

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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612.746.3660
www.merjent.com

From: Andrews, Keylor (DNR) <keylor.andrews@state.mn.us>
Sent: Tuesday, June 9, 2026 2:24 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Gregory, Shawn <Shawn.Gregory@nexteraenergy.com>; Tremayne, Aaron <Aaron.Tremayne@nexteraenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: EXTERNAL: RE: Gopher to Badger Link Project Intro - Calc Fen Discussion

CAUTION: This email originated from outside of Merjent.

Hello Kristin,

Can you send me the route in a arc pro shapefile format?

My availability in the next few weeks is

June 11, 1-430
June 15, 10-1 and 2-430
June 16, 830-10-30 and 1-430
June 17, 11-430

If you need more dates let me know

Thank you

Keylor Andrews
Calcareous Fen Program Coordinator|Ecological and Water Resources

Minnesota Department of Natural Resources
500 Lafayette Rd.
Saint Paul , MN, 55155
Phone: 651-259-5259
Email: Keylor.Andrews@state.mn.us
mndnr.gov
Calcareous Fens | Minnesota DNR (state.mn.us)
Wetlands | Minnesota DNR (state.mn.us)

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Monday, June 8, 2026 3:25 PM
To: Andrews, Keylor (DNR) <keylor.andrews@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Gregory, Shawn <Shawn.Gregory@nexteraenergy.com>; Tremayne, Aaron <Aaron.Tremayne@nexteraenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: Gopher to Badger Link Project Intro - Calc Fen Discussion

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Good afternoon Keylor,

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project

(Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project. I've also attached a .kmz of the currently proposed alignment.

We have conducted preliminary review of Natural Heritage Inventory System data and have identified two fens in proximity the Project. We'd like to meet with you to take a look at these two sites and talk next steps. We are planning on filing a Route Permit application with the Minnesota Public Utilities Commission (MPUC) this fall. Are there any good dates/times that you would be available to meet with us in the next few weeks?

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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From: Andrews, Keylor (DNR)
To: Kristin Lenz; Michael Peters; Gregory, Shawn; Tremayne, Aaron
Cc: Naomi Christenson; Bump, Samantha (DNR); Collins, Melissa (DNR); Heine, Ellen L; Ray, Allison; Coffield, Lucas; Minnesota G2BL MN Tribe Agency Correspondence; Dan Ryan
Subject: EXTERNAL: RE: G2BL MDNR Calcareous Fen - Project Intro - Meeting Notes 6/16/26
Date: Tuesday, June 16, 2026 11:59:36 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Kristen,

Good notes here are my clarifications in red below, I also added the fen numbers because the fen names can get confusing. There also may be other DNR concerns regarding non-fen issues the Melissa and Samantha would know more about.

Thank you

Keylor Andrews
Calcareous Fen Program Coordinator|Ecological and Water Resources

Minnesota Department of Natural Resources
500 Lafayette Rd.
Saint Paul , MN, 55155
Phone: 651-259-5259
Email: Keylor.Andrews@state.mn.us
mndnr.gov
Calcareous Fens | Minnesota DNR (state.mn.us)
Wetlands | Minnesota DNR (state.mn.us)

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Tuesday, June 16, 2026 10:41 AM
To: Andrews, Keylor (DNR) <keylor.andrews@state.mn.us>; Michael Peters <Michael.Peters@DairylandPower.com>; Gregory, Shawn <Shawn.Gregory@nexteraenergy.com>; Tremayne, Aaron <Aaron.Tremayne@nexteraenergy.com>
Cc: Naomi Christenson <naomi.christenson@merjent.com>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>; Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Ray, Allison <allison.ray@xcelenergy.com>; Coffield, Lucas

<Lucas.Coffield@nexteraenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Dan Ryan <dan.ryan@merjent.com>
Subject: G2BL MDNR Calcareous Fen - Project Intro - Meeting Notes 6/16/26

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Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Good morning,

Thanks again for meeting with us this morning. Meeting notes are provided below for review – please let us know if there are any inaccuracies.

Participants: Keylor Andrews (MDNR), Kristin Lenz, Naomi Christenson (Merjent), Shawn Gregory, Aaron Tremayne (GridLiance [GLH]), Michael Peters (Dairyland Power Cooperative [DPC])

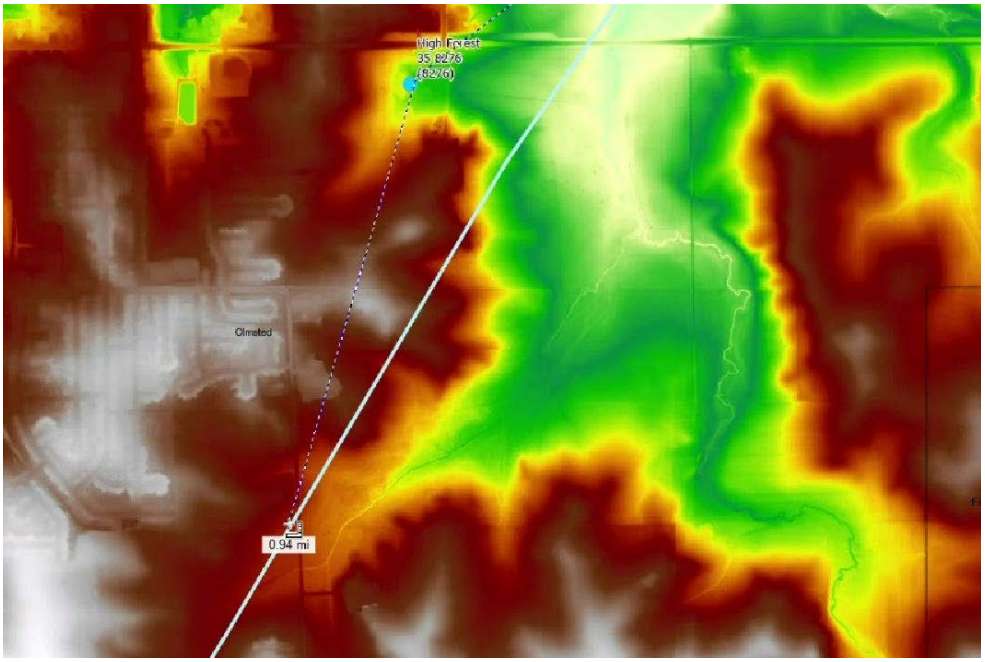
Mike Peters provided an overview of the Gopher to Badger Link Project (Project) and the routing process.

The main concerns for the Minnesota Department of Natural Resources (MDNR) regarding high voltage transmission line (HVTL) construction and the calcareous fen resources is the initial construction of the foundations and associated dewatering. MDNR prefers that transmission line rights-of-way never cross over a fen because of potential for herbicide treatment. The MDNR does not have a defined avoidance buffer for a fen – that is determined on a case-by-case basis based on the hydrology. MDNR is mainly concerned about the High Forest 35 (fen number 8276) (near Stewartville) and Chester Fens (fen number 9628), which are the closest fens to the proposed alignment. MDNR will want to understand depth of the structure foundations in proximity to these sites.

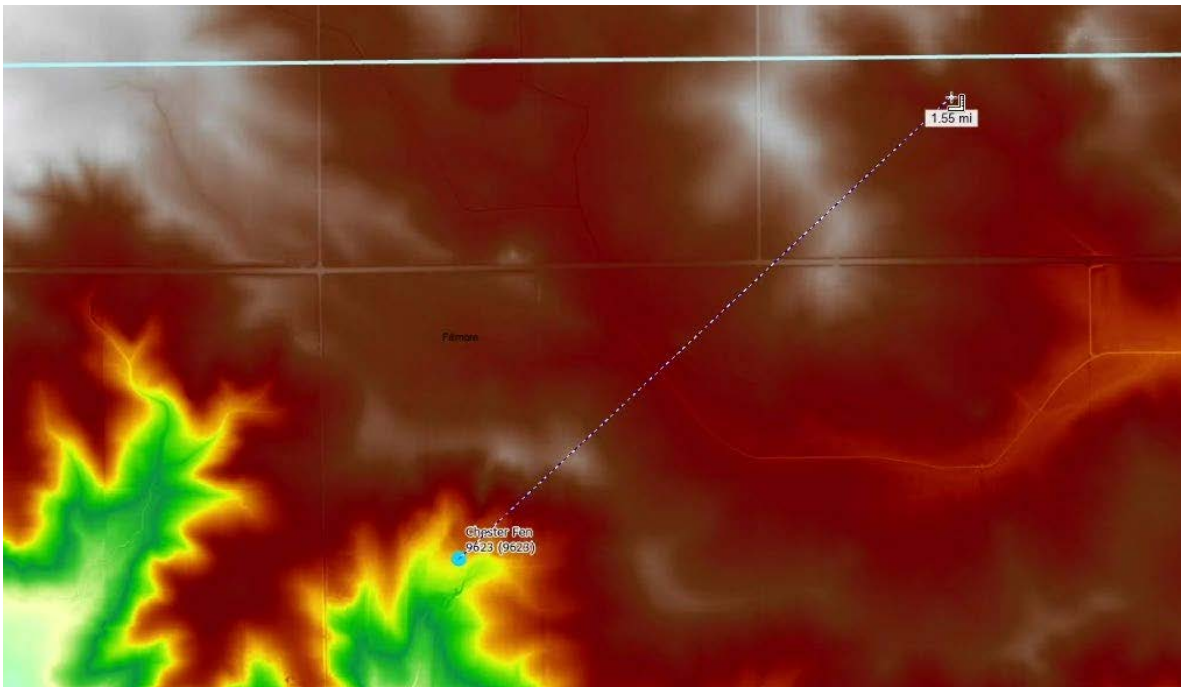
Andrews indicated that the Decorah Edge mapping from Olmsted County can be indicative of suitable hydrologic conditions for fens – consists of a fat clay layer. If clay or shale is encountered during the boring, MDNR recommends getting a complete soil profile extending at least 5 feet deeper (or through the clay layer) . MDNR is conservative on what is considered Decorah Edge – if it is a fat clay layer or deteriorating layer, it will likely be considered Decorah Edge. Piercing of the Decorah Edge by foundations could disrupt the hydrology in this area and indirectly impact fens. The Edge can perch up wetlands or it can also cap the wetlands (either drains or can increase flow). Mapping of the Decorah Edge could be incomplete in this area.

MDNR recommends conducting geotechnical borings within 1.5 miles of the fens and record static water levels within 24 hours to understand artesian conditions. Specifically for High Forest 35, recommend conducting borings 1 mile to the south and north to 1st St E. The snip below provides

elevational LiDAR profile; would not expect that water is flowing to the north of 1st St E.



For Chester ~~24~~ Fen (Fen number 9628), MDNR requested geotech within 1.5 miles of the fen in all directions (see snip below).



DPC/GLH will prepare a boring plan that incorporates the recommendations from the MDNR for these locations. MDNR indicated there is no preference on timing of the borings – could be 1-2 years in advance. Only preference to avoid drought conditions, as practicable. For the Route Permit

application, DPC will summarize this coordination and the commitment to complete the borings. Depending on the timing of the borings, DPC may be able to provide some preliminary information to MDNR for review prior to the issuance of the Route Permit to inform avoidance measures. MDNR could request additional geotechnical data in the future depending on the results. In general, the farther the structures can be sited from the fens the better.

Once the Route Permit is issued, DPC will initiate the formal consultation process by providing the *Information Requirements for Projects near Groundwater Dependent Features* (see attached form). If the MDNR concludes that there is a potential to adversely affect a fen, additional consultation will be required. If there is no potential avoidance, mitigation can include installation of groundwater monitoring wells and long-term monitoring activities. The potential to impact a fen would require a Fen Management Plan under Minnesota Admin Rules 8420.0935, and would increase the level of permitting requirements for the U.S. Army Corps of Engineers, Minnesota Pollution Control Agency and Wetland Conservation Act.

Action Items: Dairyland provide meeting notes to MDNR (include Samantha Bower and Melissa Collins), and provide boring plan that incorporates MDNR recommendations.

Kristin Lenz
Senior Project Manager
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DEPARTMENT OF NATURAL RESOURCES

Ecological and Water Resources - Groundwater Technical Analysis Unit

Information requirements for projects near groundwater-dependent features

Overview

You have notified the DNR that you intend to construct a project near a groundwater-dependent feature such as a calcareous fen wetland or a groundwater-fed stream. Your construction activities could inadvertently change groundwater flow and damage the groundwater-dependent feature. **Before you begin construction work, the DNR needs to determine whether your project could cause damage to the groundwater-dependent feature.**

This document describes the data that DNR initially needs to review your proposed project. DNR may require more data than what is initially requested, depending on the nature of the project and the feature. To minimize cost to project proposers, DNR requests and reviews data submittals iteratively. If the data described in this document is not sufficient for the conditions at the project site, then DNR will ask for additional data specific to the proposed project site.

- If the DNR determines that your project could affect the feature, then you may be required to collect additional field data, modify your project design, and/or implement a calcareous fen management plan.
- If the DNR determines that your project is unlikely to affect the feature, then we will issue a No Effect Concurrence Letter which will document your proposed activities and DNR's conclusions.

You must provide all required data in the requested format and in one data package. DNR review cannot begin until all requested information is received. DNR review will be delayed if you submit improperly formatted data, unnecessary information, or send data in multiple submissions.

Required project information

We need to know about the parts of your project that relate to groundwater, specifically:

- The overall area of disturbance and construction activities
- Where and how deep you are excavating
- Where you intend to dewater, your dewatering method, how long you intend to dewater, and dewatering rate (if known)
- Where you have already collected site data, like soil borings or depth to water table

Required data is listed on the following pages as a checklist for your ease of use.

Section 1: Project overview information

Name of your project: _____

Primary contact: This individual listed below will provide information to the DNR for this and (if needed) subsequent information requests.

Name: _____

Company: _____

Phone number: _____

Email: _____

☐ *Attach a description of your project.* Describe the purpose for the project and what activities will be conducted. It is most important to describe subsurface activities like excavation, dewatering, sheet-piling, etc. We do not need to know construction details like how thick the bituminous will be.

☐ *Attach a description of project timing and duration.* When will your project start and end? How long will the project take? Are there conditions (Ex: weather, road restrictions) that limit when you can conduct the work?

☐ *Attach a PDF map showing the perimeter of the project.* Indicate what major activities will occur or what major features will be built within the perimeter (Ex: utility trenches, basements, road grading, sheet piling, foundations). Include a legend.

☐ *Submit GIS information for the project perimeter* (ArcGIS geodatabase strongly preferred). Use UTM NAD83 Zone 15N (meters) for horizontal coordinates; use NAVD88 (feet) for vertical elevations.

Indicate location method for horizontal coordinates (check one):

☐Survey-grade GPS ☐Handheld GPS ☐Air photo ☐Other (specify): _____

Indicate location method for vertical coordinates (check one):

☐Survey-grade GPS ☐Level survey ☐LiDAR ☐Other (specify): _____

Section 2: Excavation and earth disturbance information

☐ *Attach a PDF map showing areas that will be excavated or disturbed (like sheet piling).* Clearly label each area (Ex: utility trenches, basements, sheet piling) so that the labels correlate with the table below. Include a legend. If any excavations will be in previously excavated areas, note that and list them separately on the table below.

☐ *Submit GIS data for excavation and disturbance areas* (ArcGIS geodatabase strongly preferred). Use UTM NAD83 Zone 15N (meters) for horizontal coordinates; use NAVD88 (feet) for vertical elevations.

☐ *Submit detailed elevation data for the maximum depth of excavation, if available.* If you have elevation contours that can be provided in ArcGIS raster or geodatabase, provide that as well.

☐ *Submit a spreadsheet or table of the excavation and disturbance areas.* Include the following information:

- Excavation/disturbance area names/labels (Ex:, “Excavation A”, “Sheet piling 1”, etc.)
- Installation method for each anchor, sheet piling, etc.
- Excavation and disturbance length or area for each feature (indicate units)
- Elevation of maximum depth excavation or disturbance (ft NAVD88)

Section 3: Dewatering and hydrologic information

Does the project require dewatering?

☐ Yes → If yes, you must provide the information requested in this section. Also, a DNR Water Appropriations Permit may be required for dewatering. Check here for more details about permits.

☐ No → If no, you do not need to provide the information in the rest of Section 3. Skip to Section 4 (below).

☐ Unsure → If unsure, you do not need to provide the information in the rest of Section 3. Skip to Section 4 (below).

☐ *Attach a PDF map showing areas that will be dewatered.* Clearly label each area so that the labels correlate with the table below. Include a legend.

☐ *Submit GIS information for dewatering areas* (ArcGIS geodatabase strongly preferred). Use UTM NAD83 Zone 15N (meters) for horizontal coordinates; use NAVD88 (feet) for vertical elevations.

☐ *Submit a spreadsheet or table of the dewatering areas.* Include the following information:

- Dewatering area names/labels
- Dewatering method for each area (trenches, wells, sumps)
- Dewatering length or area (indicate units)
- Static depth to water table below existing grade (feet)
- Depth of dewatering (in feet) below the static water table
- When dewatering will occur (dates)
- Duration of dewatering (indicate units)
- Expected dewatering rate (gpm) indicate if unknown
- Expected total dewatering volume (gallons), indicate if unknown

Have you observed seeps or springs in the project vicinity?

☐ No

☐ Yes → If yes, *attach a PDF map showing seeps and springs.* Clearly indicate and label each area.

Section 4: Soil boring and test pit information

If you installed soil borings or test pits, complete this section.

If you do **not** plan to install soil borings or test pits, skip this section. DNR will let you know if soil borings/test pits are needed to evaluate your project.

If you plan to install soil borings or test pits in future but have not **yet** done so, notify DNR of your plans and submit the rest of the information required in this document to DNR. When the soil borings or test pits are done, complete this section and submit to DNR.

☐ *Attach a PDF map showing all soil borings and test pits.* Clearly label each feature so that the labels correlate with the table below. Include a legend.

☐ *Submit locations for all soil borings and test pits in GIS format* (ArcGIS geodatabase strongly preferred). Use UTM NAD83 Zone 15N (meters) for horizontal coordinates; use NAVD88 (feet) for vertical elevations.

☐ *Submit logs for all soil borings and test pits in PDF format.* Each log should be an individual PDF file labeled to correlate with the PDF map and the table below. Boring logs should note material encountered, depths, and other drilling notes (e.g., depth to water table, artesian conditions, etc.).

☐ *Submit a spreadsheet or table of the boring logs.* Include the following information:

- Soil boring names/labels
- Date drilled or completed
- Ground surface elevation (ft NAVD88)
- UTME and UTMN (NAD83 Zone 15N)
- Depth drilled (feet)
- Water table elevation (ft NAVD88)
- MDH Sealing ID (if applicable)
- Hydrologic notes (artesian conditions encountered, perched conditions, etc.)

Was each soil boring advanced to the maximum depth of disturbance at that location?

☐ Yes

☐ No → If no, *attach a description of which borings did not reach the maximum depth of disturbance* and describe why the maximum depth was not reached.

Section 5: Well information

If you installed observation wells or used information from nearby well logs to design your project, complete this section. If you did not use information from nearby well logs and did not install any wells, then you can skip this section.

☐ *Attach a PDF map showing well locations.* Clearly label each feature so that the labels correlate with the table below. Include a legend.

☐ *Submit locations for all wells in GIS format* (ArcGIS geodatabase strongly preferred). Use UTM NAD83 Zone 15N (meters) for horizontal coordinates; use NAVD88 (feet) for vertical elevations.

☐ *Submit logs for all wells in PDF format.* Each log should be an individual PDF file labeled to correlate with the PDF map and the table below. Include logs for wells that you drilled for the project and for wells with information that you used to design your project.

☐ *Submit a spreadsheet or table of the well logs.* Include the following information:

- Well names (include local or project name, if used, Ex. “MW-1”)
- MWI/CWI Unique ID
- MDH Sealing ID (if applicable)
- UTME and UTMN (NAD83 Zone 15N)
- Date drilled or completed
- Ground surface elevation (ft NAVD88)
- Depth completed (feet)
- Water table elevation (ft NAVD88)
- Hydrologic notes (artesian conditions encountered, perched conditions, etc.)

Where to send this worksheet and information

Gather the information requested above, then send this completed worksheet, data, and attachments to the DNR staff person you were directed to contact. If you are not sure whether to provide data, ask the DNR contact.

From:	Kristin Lenz
To:	Michael Peters; Heine, Ellen L; Ray, Allison; Coffield, Lucas
Cc:	Brusven, Christina; Duffus, Bridget; Naomi Christenson; Dan Ryan; Jo Render
Subject:	Gopher to Badger Link - MDNR Monthly Meeting - 6/23/26 Meeting Notes
Date:	Tuesday, June 23, 2026 12:32:00 PM
Attachments:	

Participants: Melissa Collins, Samantha Bump (Minnesota Department of Natural Resources [MDNR]), Michael Peters (Dairyland Power Cooperative [Dairyland]), Lucas Coffield (GridLiance), Kristin Lenz, Jo Render, Dan Ryan (Merjent),

Lenz provided a summary of the status of the Gopher to Badger Link Project (Project) and Route Permit application. Dairyland and Xcel Energy (the Applicants) are currently developing the Route Permit application with the intent to submit to the Minnesota Public Utilities Commission (MPUC) in fall 2026 – tentatively early October 2026. The Applicants have initiated the following coordination with MDNR:

- Meeting with Keylor Andrews regarding calcareous fens in proximity to the proposed alignment – this is a longer-term coordination that will involve providing information for a No Effect Concurrence Request. Dairyland will collect geotechnical data to inform that request later.
- Merjent submitted the Minnesota Conservation Explorer (MCE) online submittal; response from MDNR is pending – Merjent has reviewed the Natural Heritage Information System (NHIS) data; no old growth communities are crossed, but there are crossings of Sites of Biodiversity Significance (SOBS) and Native Plant Communities (NPCs). Collins indicated that the MDNR would want the Project to avoid crossing Outstanding ranked SOBS and S1-S3 ranked NPCs. Collins indicated that protected plant surveys may be required. Lenz acknowledged this and indicated that the Applicants will review the MDNR MCE review when received for this information.

Lenz indicated that the Project crosses karst terrain, and the Applicants anticipate that the MDNR will request a Karst Survey Plan and Contingency Plan as part of the Route Permit application process. The Applicants are already considering this and will be collecting geotechnical data. Collins indicated that perhaps the geotechnical data should be collected sooner – how would the Applicants incorporate alignment changes if significant karst features are identified during geotechnical investigations? Lenz explained that that is the purpose of providing a route width in the MPUC Route Permit application – to allow for flexibility in revising the alignment based on additional information gathered and during the downstream permitting process. Further, typically, geotechnical borings are collected very close to the proposed structure locations because karst features/terrain can change over short distances. We would anticipate that the discovery of a karst feature (e.g., subterranean cavern) that must be avoided would be avoided by shifting the structure location up or down the alignment first, if it cannot be otherwise mitigated. Moving the alignment would be a worst-case scenario. If the alignment had to shift outside of the route width approved by the MPUC, the Applicants

would have to request a Route Amendment.

Collins also inquired about on whether the Applicants will present route alternatives in the Route Permit application. Lenz explained that there will be only one proposed route in the Route Permit application per the new 216i guidelines. The Applicants have established a minimum route width of 1,500 feet and up to the maximum 1.25 miles in locations. Bump inquired on where the Applicants had established a wider route width – Lenz/Peters indicated this included near the Rochester Airport, at the two fen locations along Segment 2 (765-/161-kV double circuit), near the Shooting Star Scientific Natural Area (SNA), near existing wind and solar facilities, and near some landowner-driven pinch points.

The Applicants are preparing an email to the MDNR Lands and Waters Division to coordinate a meeting to discuss public lands and waters crossings. The Applicants will include a table of the public lands and waters crossed by the proposed route, a shapefile of the proposed alignment, and a meeting poll. Bump and Collins requested that they be included on the email as they are the points of contact for all MDNR coordination at this point in the Route Permit application process. Lenz indicated that they will be copied on all MDNR correspondence. Lenz also indicated that the Applicants will request a federal encumbrance review of the public lands/waters crossing when the email is sent. The intent of the meeting would be to provide an overview of the Project to the MDNR Lands and Mineral Division Regional Managers and MDNR Property Managers. The Applicants are interested in site-specific concerns with the proposed crossing locations – if the property is using prescribed burns, known environmental considerations, etc. The Applicants also want to review the public land boundary information.

Collins expressed concern regarding Wildlife Management Area (WMA) crossings and proximity to WMA properties – Collins requested that the Applicants include a wider route width for locations where the alignment is adjacent to WMAs in order to ensure flexibility for moving the alignment as needed if the WMA is managed for waterfowl/bird habitat. MDNR would like the flexibility to move the route farther from the WMA if considered a potential mitigation to prevent/reduce avian collisions. There are no WMAs crossed or immediately adjacent to either Segments 1 or 2. The Applicants confirmed after the meeting that the Rustic Retreat WMA is the closest WMA to Project, approximately ¼ mile north of the proposed Segment 2 alignment near Taopi. The Rustic Retreat WMA is located within the route width, which is approximately 1.1 miles wide at that location.

Collins inquired if the Project had coordinated with the U.S. Fish and Wildlife Service (USFWS) regarding federal-listed species and Migratory Bird Protection Act. Lenz indicated that the Applicants sent a letter to the USFWS Region 3 office and that generally at this stage in the Project, they send a standard letter – more in-depth coordination would occur with the lead federal agency and/or the Applicants may request technical assistance coordination later in the process.

Lenz indicated that the Applicants intend to develop an Avian Protection Plan and Vegetation

Management Plan for the Project. Lenz inquired on the status of the Tree Replacement Plan conversations; Bump indicated that there is a meeting next week with the Forestry Division and that hopefully they will have some additional guidance for Applicants in the near future.

Next meeting is scheduled for Tuesday, July 28. Lenz indicated that the Applicants will be further along on the Route Permit application development process and may have more specific items for discussion at that time.

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From: Kristin Lenz
To: Kristin Lenz
Subject: FW: G2BL MDNR Monthly Recurring Check-in Meeting - 7/28/26
Date: Tuesday, August 4, 2026 9:27:30 PM
Attachments:

Participants:
Kristin Lenz, Jo Render, Dan Ryan (Merjent)
Melissa Collins, Samantha Bump (MDNR)
Michael Peters (Dairyland)
Ellen Heine (Xcel Energy)

Lenz indicated that the Applicants are continuing to work on the Route Permit application and still intend to file this fall. Collins inquired on whether this will be an applicant-prepared Environmental Assessment or Environmental Impact Statement (EIS). Heine explained that this would be an EIS conducted by the MPUC. The Route Permit application proposes one route, but the MPUC will conduct scoping and informational hearings and other route alternatives could be added.

Samantha Bump inquired on whether the Applicants could provide shapefiles for review; Lenz indicated shapefiles are forthcoming with the tables of MDNR public lands and waters crossed and the request for a LAWCON review.

Collins indicated that the MDNR has completed many karst inventory and dye trace studies within southeastern Minnesota, and would like to see that information incorporated into the alternative analysis. Collins indicated the concern is related to the size of the foundations; that there are wind farms that have not been built in this area due to concerns with stability. The foundations have the potential to intersect with connected underground karst features and larger foundations likely would be required to create stability. Heine explained that geotechnical investigations likely would not occur until after a Route Permit is issued as landowner access may not be available prior.

The MDNR may also be requesting a viewshed study for Louise State Park. Collins also requested additional flexibility (i.e., route width) around state lands that are in the vicinity of the proposed alignment.

Bump inquired on whether public meetings have been completed and asked about major themes and route alternatives. Heine explained that public meetings have occurred, landowners generally do not want the transmission line near their residences. Bump requested a summary of route alternatives that have been considered and rejected; Lenz indicated that there is a section of the Route Permit application that will thoroughly cover this topic.

The MDNR will also be requesting an Avian Protection Plan. Heine indicated that Xcel has a

standard Avian Protection Plan and will evaluate where diverters will be installed, but would not necessarily develop a Project-specific Avian Protection Plan. Bump explained that the MDNR was looking for a more complete analysis, in coordination with the PowerOn Midwest team. Heine explained that these are bigger structures with the bigger conductors so would be more visible to birds. Bump indicated that there may be concern with the longer span lengths. Heine explained that these are bundled conductors and would be more visible – usually only the shield wires would be marked. Collins also expressed concern about additional vertical planes, lighting and potential for nesting on structures.

Bump inquired if any additional information is needed at this time from Keylor Andrews, Calcareous Fen Program Manager. Lenz indicated that no further information needed at this time; the Applicants will need to conduct the geotechnical investigations to inform the information needed for that assessment. Bump indicated that she will invite the appropriate Lands & Minerals staff to the next meeting, scheduled on August 25, 2026. The Applicants would like to confirm the boundaries of the MDNR properties, particularly the Shooting Star SNA. Collins indicated that MDNR does not issue permits for SNA crossings. Lenz acknowledged this and indicated that Dairyland has an easement that predates the formation of the SNA, and that it appears where the right-of-way crosses the southwestern corner of the boundary based on publicly available data is likely road right-of-way. The Applicants would like to confirm the boundaries with the Lands & Minerals Division.

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From:	Kristin Lenz
To:	Collins, Melissa (DNR); Bump, Samantha (DNR)
Cc:	Michael Peters; Heine, Ellen L; Naomi Christenson; Dan Ryan; Coffield, Lucas; Dylan Felten
Subject:	Gopher to Badger Link Project - Preliminary Crossings of Public Lands and Waters for August 25, 2026 Meeting with Lands & Minerals
Date:	Wednesday, August 12, 2026 6:24:00 PM
Attachments:	

Hi Melissa and Samantha,

I apologize for the delay in getting this information to you. Attached are two tables that show the Gopher to Badger Link Project's preliminary right-of-way crossings of MDNR surface interests, including fee properties and easements, and public waters. As previously discussed, we'd like to review these with the Lands & Minerals Division to identify any potential concerns, and we also specifically want to review the boundaries of the Shooting Star Scientific Natural Area (SNA). We only have the publicly available surface interest boundary geospatial data, which often are a little off – and it looks like the corner where the proposed right-of-way may clip the SNA boundary could potentially be road right-of-way.

Could we also request MDNR review of any federal encumbrances on the MDNR surface interests crossed by the Project?

I have also attached the geospatial data for the preliminary alignment, preliminary right-of-way and route width for the Project to facilitate your review.

Look forward to discussing further at our August 25 meeting!

Thank you,
Kristin

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From: Wolf, Emily (She/Her/Hers) (DNR)
To: Piepho, Todd (DNR); Lehman, Nicole (DNR); Youngsma, Lucas (DNR); Kristin Lenz
Subject: EXTERNAL: FW: Gopher to Badger Link Project Update
Date: Thursday, August 13, 2026 8:42:19 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Hi Kristin,
Here are the appropriate DNR Area Hydrologists for this project area.

Best regards,

Emily Wolf
Spicer Area Hydrologist, Region 4 | Ecological and Water Resources

Minnesota Department of Natural Resources
164 Co Rd 8 NE
P.O. Box 457
Spicer, MN, 56288
Phone: 320-409-2042
Cellphone 320-423-4258
Email: emily.wolf@state.mn.us
mndnr.gov





From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 12:53 PM
To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Andrews, Keylor (DNR) <keylor.andrews@state.mn.us>; Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>; Donovan, Martin (DNR) <Martin.Donovan@state.mn.us>; Olson, Claire (She/Her/Hers) (DNR) <Claire.Olson@state.mn.us>; Schaefer, Benjamin (DNR) <benjamin.schaefer@state.mn.us>; Byron, Haley (DNR) <Haley.Byron@state.mn.us>; Wolf, Emily (She/Her/Hers) (DNR) <Emily.Wolf@state.mn.us>; Fairman, Kate (DNR) <kate.fairman@state.mn.us>
Subject: Gopher to Badger Link Project Update

Some people who received this message don't often get email from kristin.lenz@merjent.com. Learn why this is important

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Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

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Gopher to Badger Link Transmission Line Project
Minnesota Department of Natural Resources Monthly Call
August 25, 2026

Attendees
Minnesota Department of Natural Resources (MDNR): Samantha Bump, Haley Byron, Melissa Collins, Claire Olson
Dairyland Power Cooperative (Dairyland): Mike Peters, Dylan Felten
Xcel Energy: Ellen Heine
GridLiance Heartland: Lucas Coffield
Merjent: Kristin Lenz, Dan Ryan, Jo Render

Project Status and Desciption: Lenz summarized the status of the Project. The Applicants have submitted the draft Route Permit Application (Application) to the MN Public Utilities Commission (Commission) Energy Infrastructure Permitting staff for review and anticipate submitting the Route Permit Application this Fall. The Applicants anticipate the Commission will develop an environmental impact statement for the Project. Scoping would begin after Application submittal, potentially in late November-early December. The Project is approximately 145 miles in total and is discussed in the Application as two segments. Segment 1 will be a single circuit 765 kV transmission line owned and operated by Xcel Energy, beginning at the North Rochester Substation to a point in change of ownership in the Marion Road/US Highway 52 area. Segment 2 will be a double circuit transmission line replacing Dairyland's existing 161 kV line with a new 161 kV line and 765 kV line on shared structures. Segment 2 will be developed within the existing 161 kV transmission corridor. The existing right-of-way is approximately 80 feet, and the proposed right-of-way would typically be 250 feet wide. The Applicants anticipate a decision from the Commission in 1st Quarter 2028.

MDNR staff asked for clarification on the difference between the existing 161 kV and new 765 kv / 161 kV double circuit structures. Peters confirmed there will be a change in structures and structure height in Segment 2 when the existing 161 kV structures are replaced. Lenz noted the structures would change from wooden H-frames to steel structures; the new structures would allow for longer spans and fewer total structures needed. Lenz provided the following draft descriptions:

> "The existing 161 kV structures along Dairyland's existing Q-4/Q-8/Q-7 corridor were originally constructed between 1962 and 1968; and therefore, have been installed for 66 to 72 years. These lines consist of approximately 673 wooden H-frame structures that range in height from 80 to 120 feet tall, with spans averaging between 600 and 800 feet between each structure. The foundational width of the H-frame structures is approximately 25 to 40 feet. These structures would be removed and replaced with the new lattice structures, which although larger than the existing H-frame structures, would have longer spans therefore resulting in fewer structures than currently installed. The Applicants currently estimate that the 673 existing structures would be replaced by approximately 419 new lattice structures and 39 monopole structures; or approximately 215 fewer structures than are currently installed. "
>
> "The existing 161 kV transmission line will be rebuilt as a double-circuit on the new lattice structures with the 765 kV, and the old 161 kV structures will be removed. Wherever the new 765 kV Proposed Route deviates from the current 161 kV transmission corridor, the 161 kV transmission line will be re-routed with the 765 kV alignment, except at the Adams and Harmony substations as previously described. The

structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be 150 to 199 feet tall. Typical figures of these structures are provided in **Appendix B**. Segment 2 will generally require up to a 250-foot-wide right-of-way; by exception, a 300-foot-wide right-of-way may be required in some locations depending on span length, terrain, and other design requirements."

State Lands and Ecologically Significant Areas: Collins inquired about whether the Commission establishes a maximum width for the Proposed Route width. Collins indicated that the MDNR may request additional route width to avoid direct and indirect impacts to sensitive resources, including Scientific and Natural Areas (SNAs); Wildlife Management Areas (WMAs); state trails, forests, and parks; Board of Water and Soil Resources (BWSR) Reinvest in Minnesota (RIM) program areas, Rare Natural Communities, and karst. Lenz confirmed the Commission's maximum route width is 1.25 miles. The Applicants have requested the maximum route width in a few locations, including the area surrounding the Shooting Star SNA and trail to allow for flexibility routing in this area. Collins indicated that the MDNR may suggest a route alternative in this area to avoid the Shooting Star SNA and trails, and increase the distance from the Lake Louise State Park to minimize aesthetic impacts. Collins also indicated that the MDNR may request a setback distance from MDNR-managed properties (e.g., SNA, WMAs, etc.).

Lenz indicated that the draft Application includes a discussion of alternatives and constraints reviewed by the Applicants. Heine encouraged the MDNR to provide their routing comments and any suggested route alternatives during the Commission's scoping process, as this would allow the Commission to study and compare the route alternatives. Collins noted MDNR's preference for discussing alternatives through early coordination prior to the submittal of the Application, to allow for a greater opportunity to discuss avoidance of sensitive areas prior to public scoping. This is the approach being taken with other projects. The MDNR are receiving communications from many concerned citizens regarding the Project. Bump affirmed the MDNR preference for discussion of alternatives during early coordination to allow MDNR scoping comments to focus on which alternatives are preferred, acknowledging the Applicants are constrained by the requirement to provide only one proposed route in the Application per the new regulations implemented in July 2025. Collins stated MDNR division leadership is interested in speaking with the leadership of Xcel Energy and Dairyland prior to submittal and requested points of contact to coordinate that discussion. Xcel Energy and Dairyland to take that back to identify the appropriate points of contact.

The Applicants provided MDNR staff with copies of the proposed route, proposed right-of-way, and proposed alignment shapefiles on August 12, 2026. Lenz requested that the MDNR provide suggested areas of concern or potential route alternatives based on their review of these shapefiles. Collins noted concern for scenic areas and where the boundary of the proposed route crosses within 0.25 mile of Rare Natural Communities that are groundwater dependent. The route width also crosses sensitive karst areas that may require geotechnical analysis. Collins emphasized MDNR does not want to propose alternatives that are not feasible and prefers early coordination.

Shooting Star SNA and State Trail: Collins indicated that it appears that the proposed right-of-way would cross the SNA and the Proposed Route crosses the state trail three times. Collins also noted that there is a BWSR RIM easement adjacent to the SNA. Lenz indicated that the Applicants have met with BWSR to discuss potential crossings of RIM easements. Lenz stated the proposed right-of-way clips the corner of the SNA boundary, but this location appears to be road right-of-way based on the available MDNR public lands tract data. The MDNR does not

have better geospatial data to confirm the boundary of the SNA. Bump provided the following legal description for the SNA:

> "All that abandoned railroad right-of-way located in and passing through Section Thirteen (13), Township One Hundred One (101) North, Range fifteen (15) West, which abandoned right-of-way is a 100 foot strip being 50 feet on each side of a center line, as identified as Parcels Nos. 6 and 7 on Chicago, Milwaukee and St. Paul Railroad Company map MINN 9-2 and being a part of that property conveyed to the Grantor by the Trustee of the property of Chicago, Milwaukee, St. Paul and Pacific Railroad Company by deed recorded in Book 426 at pages 218-220 in the Mower County Recorder's Office."

Lenz noted additional cadastral survey would be undertaken to better define the SNA boundary. Survey results would be shared with MDNR. Collins stated no permission will be given to cross the SNA; and the MDNR would likely require a setback from SNAs. MDNR would probably request a modification to the proposed route in this area.

Racine Prairie SNA: Lenz confirmed the SNA is within the proposed route width, but is not crossed by the proposed right-of-way. Lenz noted that although the SNA is located within the proposed route, it is unlikely that Dairyland would move the proposed alignment and associated right-of-way in this area from the existing transmission line corridor to cross this SNA except in extreme circumstances where there is no other alternative to avoid impacts to resources. The wider route width is meant to allow for flexibility in identifying the proposed alignment, balancing environmental and human constraints and incorporating feedback from landowners, agencies and other stakeholders. The Racine Prairie SNA is located off Highway 63 and occurs within a 11.8-mile-long segment of a 1.25-mile-wide proposed route to allow for flexibility in routing in proximity to the Rochester International Airport and the High Forest 35 calcareous fen.

Blufflands Trail System, Chesterwoods Segment (Olmsted County): Lenz requested clarification on whether the trail segment just west of Eyota on Segment 1 has been built or is still in the planning stage. Publicly available information indicated the land has been purchased by MDNR, but the trail has not been built. Olson will follow up with State Parks and Trails to confirm when the trail may be built.

Winnebago Creek AMA: The AMA is crossed by the proposed right-of-way.

Richard J. Dorer Memorial Hardwood State Forest: The forest is crossed by the proposed right-of-way.

Crossing Licensing: Olson asked whether there are existing crossing licenses for Segment 2 that may be affected by the proposed replacement. Felten stated the majority of the existing line agreements predate MDNR purchase of the properties. If line work has occurred since MDNR purchase, such as the installation of fiber, licenses have been implemented while the existing transmission line is under an earlier blanket agreement. Olson noted decommissioning of licensed lines would be handled in separate processes outside of the ULA application process. If additional space outside of the licensed area is required to provide access to the proposed right-of-way (e.g., access roads, temporary workspaces), separate short term leases would be required. Lenz confirmed details regarding temporary workspace and access are still being developed.

Olson asked for clarification on how the licensing application would be handled for those segments of line where the existing line is not already licensed. Lenz noted the Applicants will apply for a crossing license for both the 161 kV and 765 kV lines. Olson stated separate licenses will be needed for the 161 kV and 765 kV lines and confirmed images and mapping of the route can be common to both applications as long as the different lines are clearly labeled.

Upper Mississippi River National Wildlife and Fish Refuge: Lenz noted constraints on the eastern end of the Project related to the Refuge. Peters stated there are ongoing discussions with regional Refuge management staff. There are two existing 161 kV lines crossing the Refuge in a 200-foot-wide corridor. Dairyland intends to use the existing right-of-way.

Next Steps: Lenz acknowledged MDNR preferences for early coordination. Lenz reiterated that the 350-page Route Permit Application describes the route alternatives considered by the Applicants and describes the various constraints in the Project area that would be beneficial context for the MDNR when considering potential route alternatives. These details are challenging to discuss without a better understanding of the specific locations and potential route alternatives that the MDNR would like the Applicants to consider. Collins reiterated the request to review those considerations in early coordination discussions so that MDNR understands what alternatives may be feasible and the rationale behind the decisions made for the proposed route. MDNR has reviewed the alternatives that were described during public outreach for Segment 1. MDNR is primarily concerned with understanding if there were any alternatives considered for Segment 2. Collins inquired about the rationale for the wider route width east of the city of Rochester. Lenz explained that this was due to proximity to the Rochester International Airport. Collins inquired if the proposed alignment through this area has been approved by the airport; Lenz indicated that these communications are still in progress.

MDNR indicated that they will continue their review of the proposed Project shapefiles and will get back to the Applicants with additional comments.

Action Items:

- Merjent will follow up with names of contacts for a meeting between MDNR Division leadership and Applicant leadership.
- MDNR will provide their comments on the Project routing.
- MDNR will provide information on the Chesterwoods Segment of the Blufflands Trail System.

DEPARTMENT OF NATURAL RESOURCES

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

August 31, 2026

Michael Peters
Environmental Permitting Lead
Dairyland Power Cooperative

Ellen Heine
Principal Agent, Siting and Land Rights
Xcel Energy

Subject: Gopher to Badger Link 765 kV, High Voltage Transmission Line Project

Dear Michael Peters and Ellen Heine,

Thank you for engaging the Minnesota Department of Natural Resources (DNR) in early coordination for the upcoming Gopher to Badger Link 765 kV High Voltage Transmission Line (HVTL). This HVTL project proposes to connect to a substation near Pine Island, MN in Goodhue County and extend a total of 140-miles to the southeast through Wabasha, Olmsted, Mower, Fillmore, and Houston Counties and across the Mississippi River into Wisconsin. The DNR has concerns that natural resource impacts have not been fully explored in the selection of a route and would like to further coordinate to better understand what project alternatives have been considered, especially for the MariBell Segment of the project that extends from Marion to the Mississippi River. With that goal in mind, the DNR respectfully submits the following comments for your consideration as you prepare to submit a route permit application to the Public Utilities Commission (PUC).

Early Coordination

The DNR is concerned by the nature of early coordination for the project and that our agency has not been able to provide input on proposed route alternatives in order to reduce potential impacts to natural resources. DNR initiated contact with the applicant in April 2026 to request monthly meetings during the development of route alternatives. DNR also requested shapefiles of the proposed project area to begin our review for natural resource considerations. Shapefiles

were not provided by the applicant until August 13, 2026. The applicant sent DNR an early coordination letter on May 1, 2026, and an updated version on August 12, 2026. A Natural Heritage Review request that was submitted to Minnesota Conservation Explorer (MCE) on June 11, 2026, and is currently under review, but has not been used to inform route alternatives. On August 25, 2026, during a meeting with the applicant, DNR expressed these concerns and a desire to explore route alternatives that limit natural resource impacts during early coordination. The applicant responded by directing DNR to submit alternate routes during the scoping period after the route application has already been submitted.

Route Alternatives

Segment 1, the 34-mile proposed route from Pine Island to near Rochester, explored several route alternatives before narrowing down the applicant's preferred route. This selection was made without coordination with DNR on potential natural resource impacts. The longer 105-mile Segment 2, also known as the MariBell Transmission Project, is following an existing 161kV transmission line route, and the applicant did not consider any alternatives. Our understanding of Segment 2 is that the existing 161kV transmission line was built between 1962 and 1968 and is in some places unlicensed. The existing transmission line is between 80 to 120 feet tall with a Right-of-Way (ROW) only 80 feet wide. The proposed 765kV HVTL would be between 150 to 210 feet tall and have an average ROW of 250 feet. This new HVTL would be approximately double the height of the existing line and would require more than triple the amount of ROW and tree clearing. The 765kV HVTL would require less structures than the existing transmission line, but these structures would be far more substantial and require deep foundations through a sensitive karst area of the state.

DNR generally supports the use of existing corridors for locating transmission lines. In this situation, the 161kV transmission line route was selected over 60-years ago prior to the development of the regulatory framework that exists today and without consideration for many of the unique natural resources in the area. The 161kV transmission line will be relocated on the new 765kV HVTL structures providing the ideal opportunity to relocate the line away from sensitive resources following guidance based on today's standards. Despite following existing routes for a large portion or the proposed route, some of the additional 170 feet of ROW width expansion would have a greater impact on natural resources and state-listed species than an entirely new route would in a less sensitive location. This is particularly true through river corridors where extensive tree clearing would be required within shoreland, in state forests, in sensitive karst geology, and in areas where rare plant and animal species occur. We request that the applicant work with DNR to identify sensitive areas where the exploration of route alternatives would be appropriate. DNR does not support the project as proposed without the meaningful consideration of any route alternatives for Segment 2.

General Comments

Please consider the following comments when making the final route selection and through the environmental review and permitting processes.

Wildlife

Direct Impacts

Habitat fragmentation is one of the largest threats to wildlife. Areas that would require vegetation and tree removal or ground disturbance in shoreland, prairies, wetlands, forests, Minnesota Biological Sites of Biodiversity Significance, and DNR Native Plant Communities should be prioritized for avoidance. Habitat preservation should also be prioritized near public lands, including Wildlife Management Areas (WMA), state parks, state forests and conservation lands. This will minimize the long-term impact of linear disturbances.

Avian Impacts

Although the risk of avian electrocution is lower for 765kV projects than on smaller lines, it remains a concern for 161kV portions of the project, and particularly at substations. Avian-safe designs should be incorporated into pole and substation design and operation. Avian collisions should be mitigated through thoughtful siting and the use of flight diverters. Areas where flight diverters are needed include, but are not limited to:

- Flight pathways between water basins and wetland complexes
- Watercourse crossings
- Large blocks of wildlife habitat
- Important bird areas
- Migratory corridors

DNR staff are available to consult on where flight diverters should be utilized.

Given the scope and scale of the proposed project, developing an Avian Protection Plan (APP) is strongly recommended to reduce the operational and avian risks resulting from interactions with electric utility infrastructure. The recently updated guidance from the Avian Power Line Interaction Committee should be incorporated into the plan.

Bats

All of Minnesota's bats, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. During the active season (approximately April-November) bats roost underneath bark, in cavities, or in crevices of both live and dead trees. 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 from June 1 through August 15.

Indirect Impacts

Displacement of wildlife, particularly grassland birds, is a significant concern. Grassland birds are deterred by large structures and will avoid using otherwise suitable habitat. This can lead to decreased survival, reproduction, and distribution. Adopting an adequate setback distance from WMAs and other suitable grassland bird habitat is strongly encouraged. A robust discussion of indirect impacts should be included in the Environmental Impact Statement along with proposed setback distances.

Minnesota Recreation System Units

State Parks

Lake Louise State Park is located in close proximity to the proposed route. Preserving the aesthetic value of state parks is essential to fulfilling their purpose outlined in Minnesota Statutes 86A.05 subd. c and fulfilling the DNR's federal Land and Water Conservation Fund obligations. Impacts on state park viewsheds can negatively affect visitor experience and hinder the DNR's ability to continue providing high-quality outdoor recreational opportunities for this and future generations. A visual impact study should be completed to assess potential impacts on the state park. All impacts on state parks should be avoided.

State Trails

The proposed route width includes two State Trails but would have significant impacts on Shooting Star State Trail, which runs along the border of several WMAs and prairies before connecting to Lake Louise State Park. The proposed route would cross the trail three times and run directly parallel to it for over a mile impacting natural scenic views. The visual impact of the proposed 765kV HVTL would be significantly greater than the existing wooden structures, which are half the height the proposed HVTL.

- Great River Ridge State Trail
- Shooting Star State Trail

State Water Trails

State water trail crossings should be avoided when practicable. If a state water trail is crossed, impacts on the riparian area should be minimized to the extent feasible and installation and maintenance should be done in a way that limits interference with recreational use.

- Zumbro River State Water Trail
- Mississippi River State Water Trail

Wildlife Management Areas

Wildlife Management Areas (WMA) are the backbone of DNR's wildlife management efforts. Large-scale developments in close proximity to WMAs impact the ability to perpetuate wildlife

populations and provide robust recreational opportunities. Transmission lines can also impact management activities such as prescribed fire and grazing. There are significant safety concerns regarding the use of prescribed fire near transmission lines, which may prevent the use of fire as a management tool. The use of grazing may also be hindered as some local producers have concerns regarding stray voltage.

The proposed project could potentially impact the following WMAs depending on the placement of the line within the proposed route width, requiring thoughtful infrastructure placement.

- Rustic Retreat WMA
- Beaver Creek WMA
- Nosek WMA

Aquatic Management Areas

Aquatic Management Areas (AMA) provide angler and management access, protect critical shoreland habitat, and provide areas for education and research.

- Winnebago Creek AMA

State Forest

State Forests provide critical wildlife habitat, as well as important recreational opportunities such as camping and miles of trails to accommodate every kind of activity: hiking, hunting, mountain biking, OHV riding, cross-country skiing, snowshoeing, horseback riding, and more. State forests in the southeastern part of the state stabilize soil protecting highly erodible steep bluffland and prevent erosion.

- R J D Memorial Forest (Olmsted County)
- R J D Memorial Forest (Houston County)

Scientific and Natural Areas

Scientific and Natural Areas protect natural features of exceptional scientific or educational value that include native plant communities, populations of rare species, and geological features. These areas are open to recreational activities that do not disturb natural conditions such as birdwatching, nature photography, and hiking. All impacts on SNAs should be avoided.

- Shooting Star Prairie SNA
- Racine Prairie SNA

Utility Crossing License & Access Agreements

If infrastructure crosses over, under, or across DNR-managed lands, a Utility Crossing License from the DNR Division of Lands and Minerals (LAM) will be required. DNR-managed land cannot be used to access project sites without a formal agreement. If needed, please work with LAM

staff on utility crossing licenses and access agreements. A license from LAM cannot be issued until Public Utilities Commission proceedings are complete and a site permit has been issued. Please note that the decommissioning of the existing 161kV transmission line route should be submitted separately from the proposed project and that the new 161Kv transmission line should be submitted for licensing separately from the proposed 765Kv HVTL even though they would share pole structures.

State-listed Species

Because the submittal of the project to Minnesota Conservation Explorer (MCE) occurred in June, coordination regarding rare features and state-listed species has not informed route selection up until this point. 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. Further discussion of route alternatives may be necessary to avoid significant impacts to state-listed species. Of particular concern is further forest and wildlife habitat fragmentation, which should be avoided. DNR is still reviewing the project submitted to MCE. Please be aware that extensive documentation of threatened and endangered species has occurred along the proposed route, and that some of that data is still being processed by DNR and is not yet available in Natural Heritage Information System data used by the applicant. DNR will use this most recent data in our review. The route permit application should not be considered complete without this review.

Native Plant Communities and Sites of Biodiversity Significance and Sensitive Ecological Areas

Impacts to Minnesota Biological Survey (MBS) Sites of Biodiversity Significance and DNR Native Plant Communities (NPC), especially those with a Conservation Status Rank of S1-S3, be avoided. When feasible, operate within already disturbed areas and retain a buffer between proposed activities and these plant communities. The portion of the project area located within the driftless region of the state containing steep bluffs and highly erodible landscapes will be especially challenging. As currently proposed, this route would cross many MBS Sites and NPCs, some of which are considered rare and vulnerable to extirpation in the state. Even in areas with an existing 80 feet of ROW, any expansion into these rare forested NPCs could have a significant impact.

RIM and CREP Land

There are numerous Reinvest in Minnesota (RIM) and Conservation Reserve Enhancement Program (CREP) lands documented within the proposed route. These programs restore wetlands and protect lands are specifically identified as environmentally sensitive. While these areas may not be DNR managed lands, many are a part of a patchwork of conservation areas and connected to DNR lands as part of a larger block of managed wildlife habitat. Impacts to

RIM and CREP lands will also impact the adjacent DNR lands, their management and the wildlife that utilizes them.

Vegetation Management Plan

We look forward to working with you and the Vegetation Management Plan Working Group on the Vegetation Management Plan (VMP). The following should be discussed in the VMP:

- Tree removal timing
- DNR Native Plant Communities
- MBS Site of Biodiversity Significance
- Wildlife Management Areas
- Aquatic Management Areas
- Scientific and Natural Areas
- State Forests
- RIM and CREP easements

Wetlands, Rivers and Trout Streams

Construction and operation of the project can impact water resources including riparian and shoreland areas and the wildlife that depends on these spaces. While we have identified some concerns with existing ROW on Segment 2, we do generally encourage following existing transportation or transmission line ROW over rivers and streams to reduce impacts on riparian zones and wildlife that use watercourses as travel corridors. Trout streams are groundwater dependent and need to maintain cold temperatures to provide habitat. Removing vegetative tree cover and shade raises water temperature, therefore we discourage the selection of routes that will cross designated trout streams and their tributaries. Impacts on the following public watercourses are of particular concern:

- Zumbro River (M-034)
    - This route creates a new river crossing through intact natural forest vegetation mapped as an MBS Site.
- Root River (M-009)
    - An extensive part of the river and associated MBS Sites and R J D Memorial Hardwood Forest are within the extended route width. DNR does not support this area for route consideration.
- Frego Creek (M-009-010-010-006)
    - Designated Trout Stream surrounded by MBS Site

    - The route would also cross two trout stream tributaries
- Riceford Creek (M-009-010-005)
    - Designated Trout Stream
    - The route would also cross one trout stream tributary
- Winnebago Creek (M-001)
    - Designated Trout Stream
    - Route would cross seven trout stream tributaries
    - Route would cross adjacent MBS Sites and NPCs
    - Route would cross the Winnebago Creek AMA and associated RIM easement

Calcareous Fens

Calcareous fens are a protected wetland type under Minnesota Statute 103G.223, which states that calcareous fens may not be impacted or altered by any activity, unless the Commissioner of the DNR agrees that some alteration is necessary under an approved management plan. Impacts include any temporary or permanent disturbance from project-related activities, including construction, transport, infrastructure, or hydrology or water quality changes. For regulatory purposes, the boundary of calcareous fens is the boundary of the entire wetland complex surrounding the fen community. For fens in the vicinity of the project area, impact avoidance on the wetland containing the calcareous fen will need to be demonstrated.

Coordination with DNR will be needed to certify there is no impact, or a calcareous fen management plan will need to be approved by the DNR Commissioner. DNR approval of the final project plan and avoidance measures is required prior to project construction. The main point of contact for these determinations is the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).

Rare Natural Communities

Rare natural communities (RNC) are located within the preliminary route corridor and are one of the "Special Considerations" listed in the Minnesota Wetland Conservation Act rules for wetland replacement plans.

Avoiding these areas is encouraged as they contain high-quality native plant communities that support an array of wildlife. Please review the joint MN Board of Water and Soil Resources and DNR RNC Technical Guidance and RNC spatial data to ensure these areas are properly evaluated. Please note that a groundwater dependent RNC is located in close proximity to the proposed route in Houston County.

Public Waters Permits

A Water Appropriations Permit is required if the water pumped exceeds 10,000 gallons in a day, or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced time for review, may be used for the dewatering if the dewatering volume is less than 50 million gallons and the time of the appropriation is less than one year.

Where the utility line crosses public waters (or DNR-owned land), a Utility Crossing License is required. If, in order to access a site, a public water crossing needs to be constructed or work must be performed below the ordinary high water level, a Public Waters Work Permit is required.

Karst Geology

Karst is a terrain with distinctive landforms and hydrology created primarily from the dissolution of soluble rocks. It is characterized by sinkholes, caves, springs, and underground drainage dominated by rapid conduit flow. In karst, water dissolves fractures and joints in the bedrock forming a network of interconnected underground conduits that can carry groundwater long distances at speeds up to miles per day. Sinkholes, blind valleys, karst windows and springs are found on the land surface above underground karst systems and are thought of as surface expressions of karst or "karst topography." Karst also occurs in areas with few or none of these land surface features and therefore the absence of a karst feature does not imply the absence of karst.

Filmore and Olmsted counties have the most densely concentrated surface karst features in the state. Cave systems are documented in each county, especially within the Galena Group, and include Mystery Cave, Niagara Cave, and multiple caves managed by the Minnesota Cave Preserve. The proposed route is less than two-miles from the Niagara Cave and Goliath Cave entrances, and less than one-mile from the Holy Grail Cave entrance. Several of these cave systems extend for miles underground, and much of the bedrock under the entire area is a complex network of voids and conduits.

Results from ongoing springshed mapping, surface karst feature mapping, and spring mapping illustrates a well-developed karst in the Spillville though Cummingsville formations. Dye tracing, summarized in the Minnesota Groundwater Tracing Database, has established rapid groundwater flow rates over large distances.

The proposed route also crosses the well-documented karst of the Prairie du Chien Group. Karst features of the Prairie du Chien most commonly occur near specific horizons but do occur throughout the entire group. These horizons are associated with catastrophic failure and rapid drainage through sinkhole collapse of three different wastewater treatment lagoons at four separate times in southeastern Minnesota.

Impacts to karst can ultimately have a wide range of effects, including impacts on water quality, aquatic communities and associated trout fisheries. Impacting karst can also have an influence

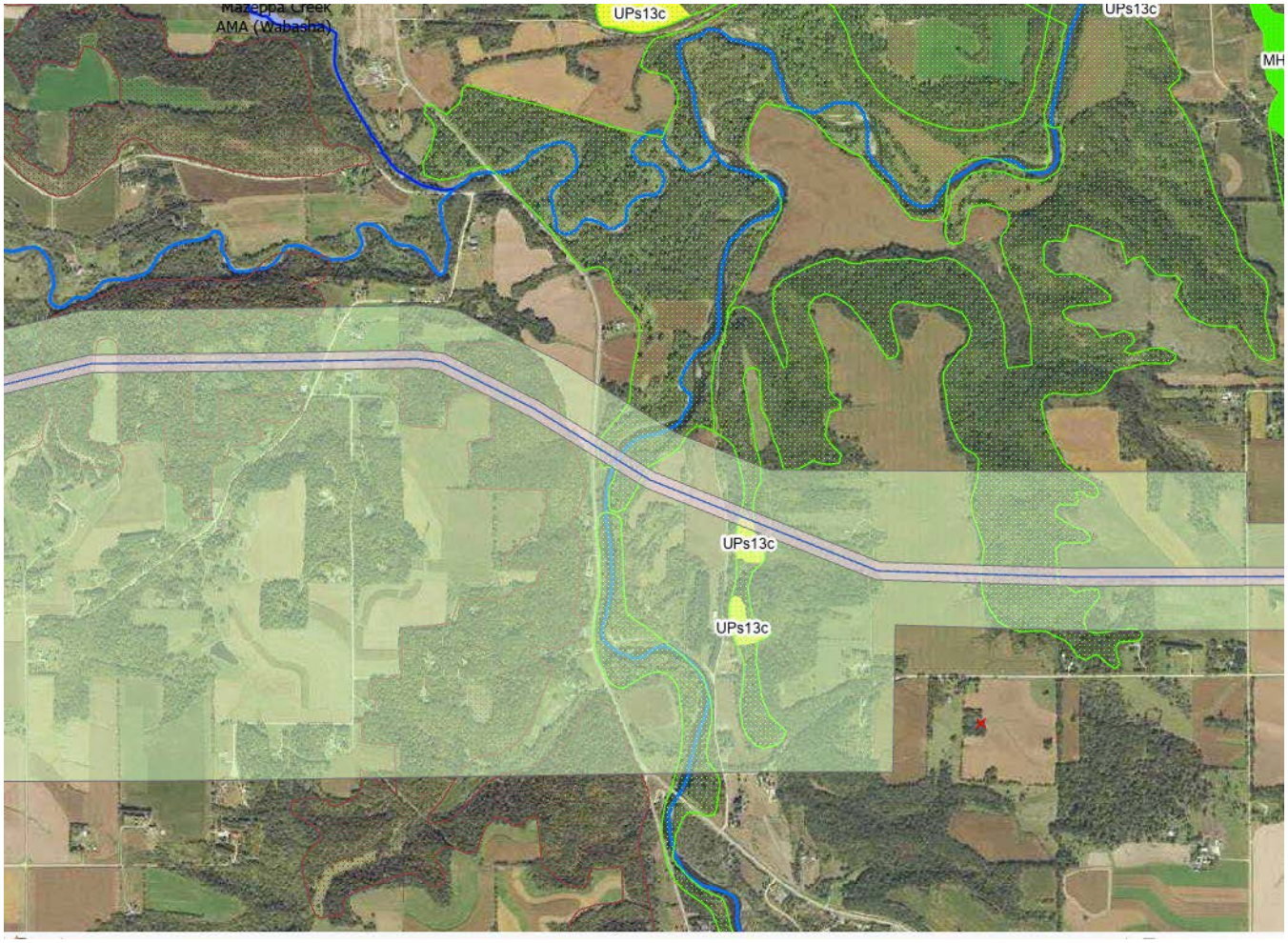
on cave temperature/airflow and humidity and a variety of species that depend on environmental conditions that are supported by karst features (Algific talus native plant communities, bat hibernaculum, Pleistocene snails, etc.). There are known cave adapted invertebrates in Goliath's Cave that are very susceptible to very small changes in water quality. Altering airflow and hydrology can threaten both species and natural plant communities that are dependent upon site conditions that are associated with karst.

Building in karst can also be a risk to the proposer and builder as structure collapse is a concern. This area poses many challenges for constructing tower foundations, whatever construction method is used. Grout and concrete poured for foundations has the potential to migrate large distances and could impact nearby caves, groundwater, domestic wells, and high-value trout streams. Therefore, we make the following recommendations:

- We recommend that a Geotechnical Report is completed for proposed structure sites by a firm with expertise in building in karst.
- While this project is not a feedlot or manure storage area there are many similarities to siting the structure foundations in a karst landscape. We recommend a Karst Inventory Survey is completed following the 3 steps outlined in the MPCAs Locating Feedlots and Manure Storage Areas in Minnesota's Karst Region guidance document in all areas mapped as prone to karst surface feature development.
- We recommend referencing the Karst Features Inventory and the Minnesota Spring Inventory to make sure that structure sites are not located adjacent to sinkholes and that known and mapped sinkholes are sufficiently buffered. It is important to note that current mapping of karst features and springs is incomplete. No surface sinkhole features were present before a large sinkhole opened up to form the entrance to Holy Grail Cave, a large underground system containing passages over 100 feet tall located in the project vicinity. There may be other such unknown features in this area.
- We recommend that the proposer also coordinates with the Minnesota Cave Preserve, which owns land associated with Goliath's Cave and Holy Grail Cave for a better understanding of the full extent of the caves near the project area.
- We recommend that the project follow guidance from the Minnesota Stormwater Manual's Karst page during construction activities.
- We recommend that the project have appropriate safeguard and mitigation plans for when grout and concrete is pumped into voids in the bedrock.

Comments By County (North to South)

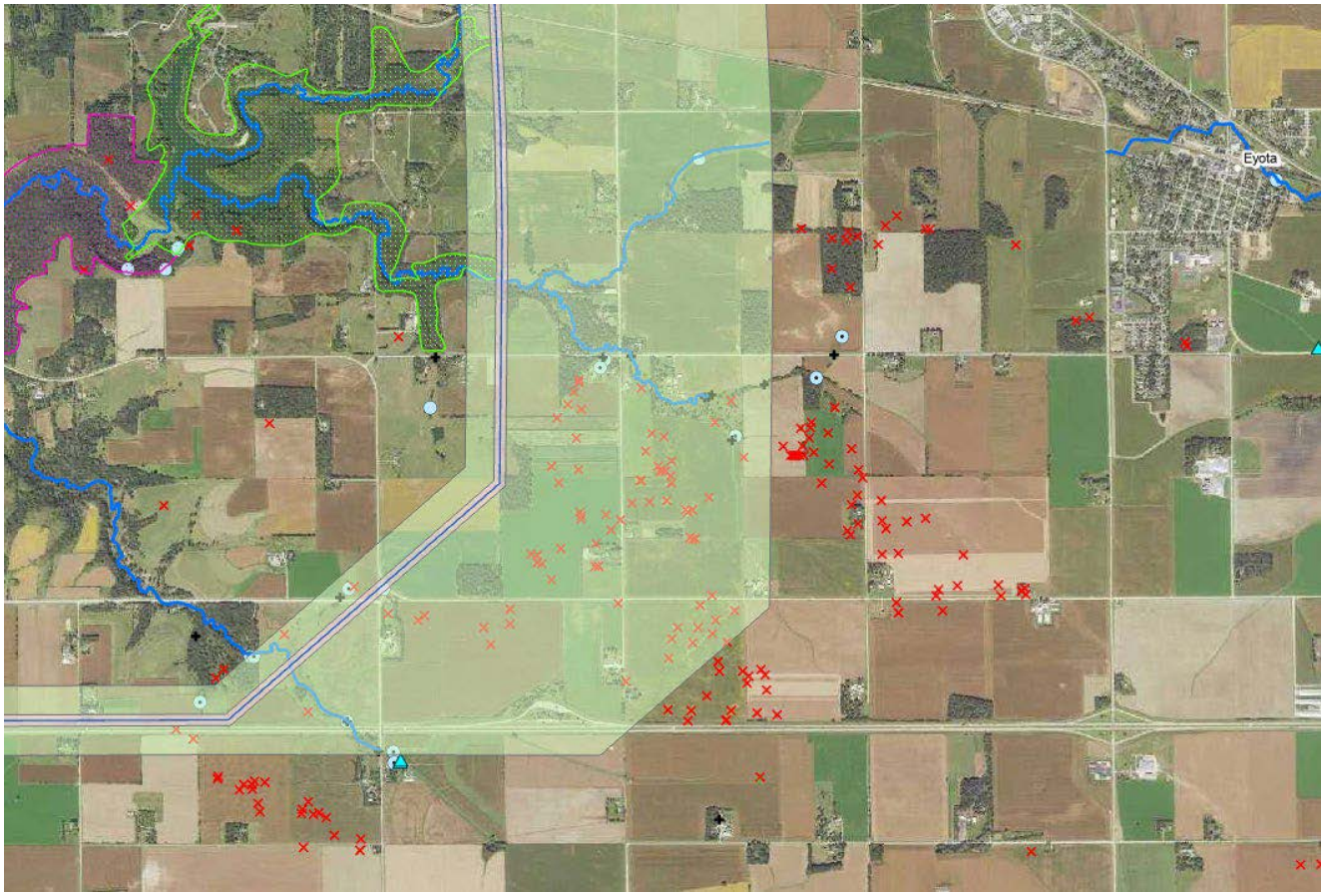
Wabasha County



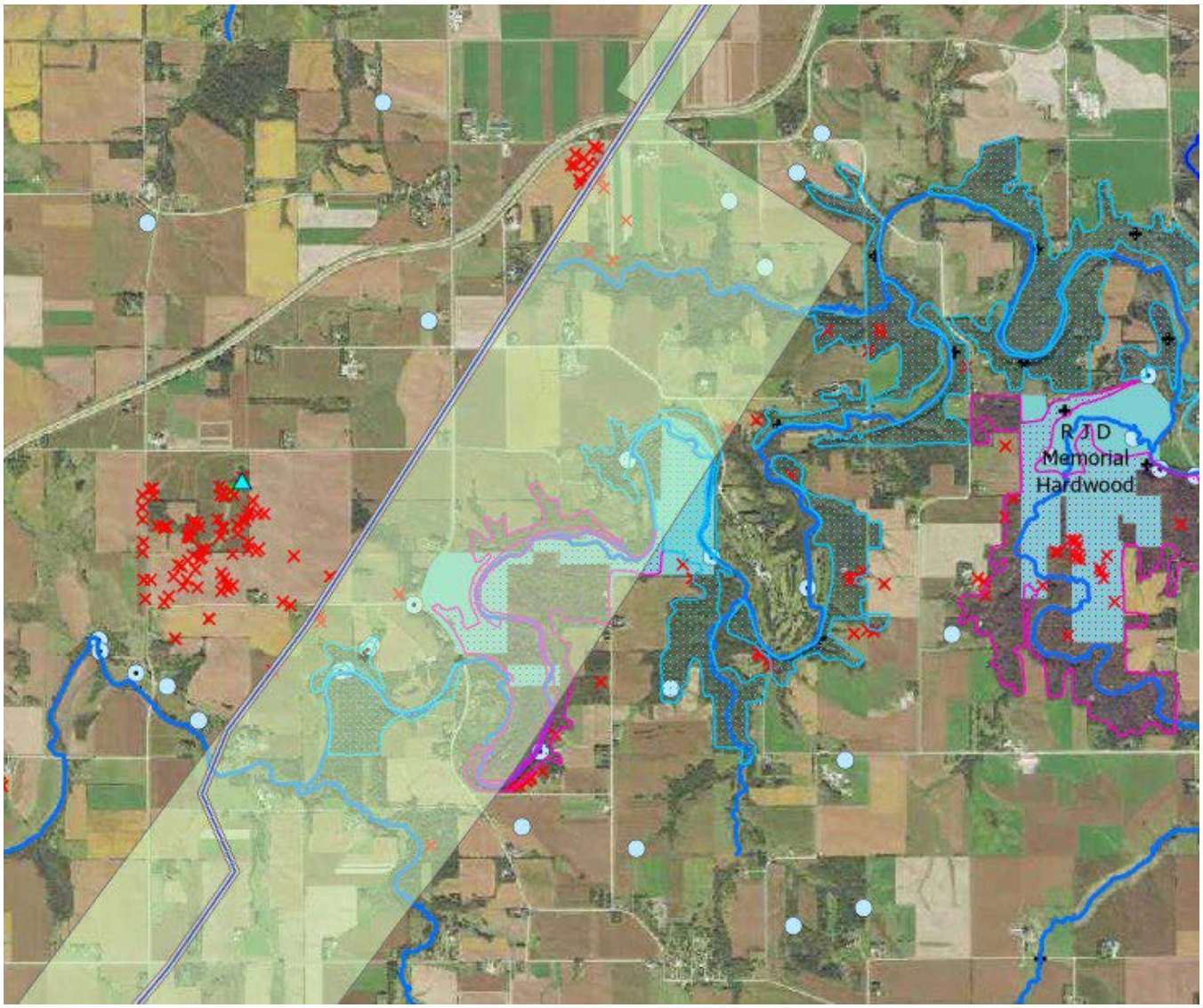
The proposed route crosses the Zumbro River in Wabasha County at a point where there are several MBS Sites of Biodiversity Significance, and a Dry Bedrock Bluff Prairie (Southern, UPs13c) NPC. Less than 1% of Minnesota's native prairie remains intact and we strongly advocate for preserving and maintaining all native prairie remnants. Routing the HVTL though this area could pose ongoing challenges for prairie maintenance through prescribed burning that could eventually degrade this rare feature.

We also recommend crossing the river at a point that minimizes tree removal and impacts to MBS Sites and avoiding MBS Sites where tree removal would fragment habitat and destabilize steep slopes.

Olmsted County



Olmsted County contains many sensitive areas including calcareous fens, natural springs, and karst geology. The route width through the above area contains numerous sinkholes (red x). The siting of structures through this area and the area shown in the image below will require extensive geotechnical investigation.



An expanded route width was used for the area above and includes a large section of the Root River that is surrounded by R J D Memorial Hardwood Forest, NPCs, and MBS Sites of Biodiversity Significance including the Simpson Maderitic Cliffs, which are mapped as an MBS Site of Outstanding Biodiversity Significance. "Outstanding" sites contain the best occurrences of the rarest species, the most outstanding examples of the rarest native plant communities, and/or the largest, most ecologically intact or functional landscapes. All of the NPCs mapped in this area are ranked S1-S3, which means that they are vulnerable to extirpation and prioritized for conservation.

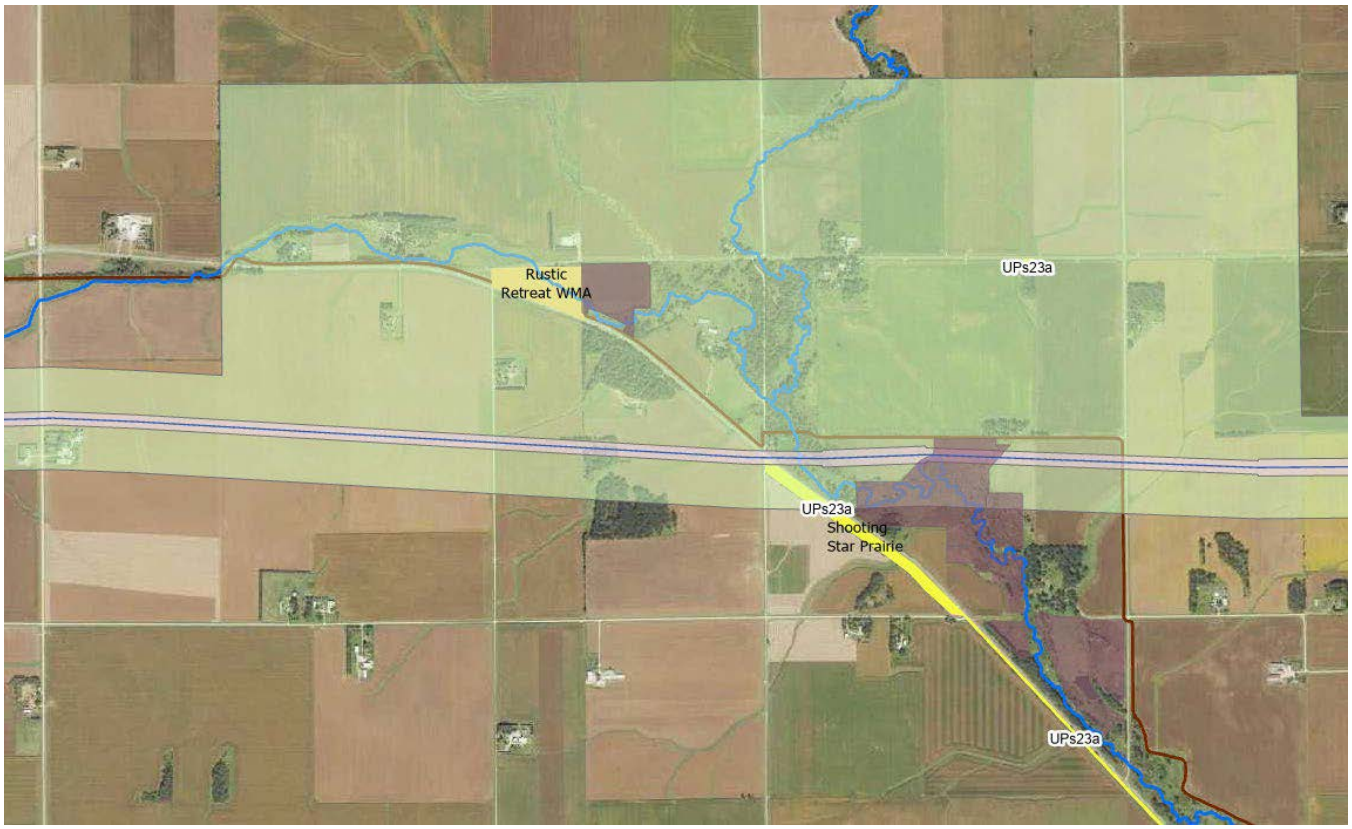
Additionally, the removal of tree cover through this bluff system could destabilize the area and create ongoing erosion control and sedimentation issues in and along the Root River. DNR does not support the inclusion of this expanded route width through this area nor any route that would fragment state forest or cross this sensitive ecological area.

Mower County



The expanded route width through this section of Mower County includes the Racine SNA, which is also mapped as a Mesic Prairie (Southern, UPs23a) NPC with an S2 rank. We do not support the inclusion of the SNA in the route width and request that the proposer work with DNR to ensure an appropriate setback is maintained to avoid impacting the SNA and any associated maintenance activities.

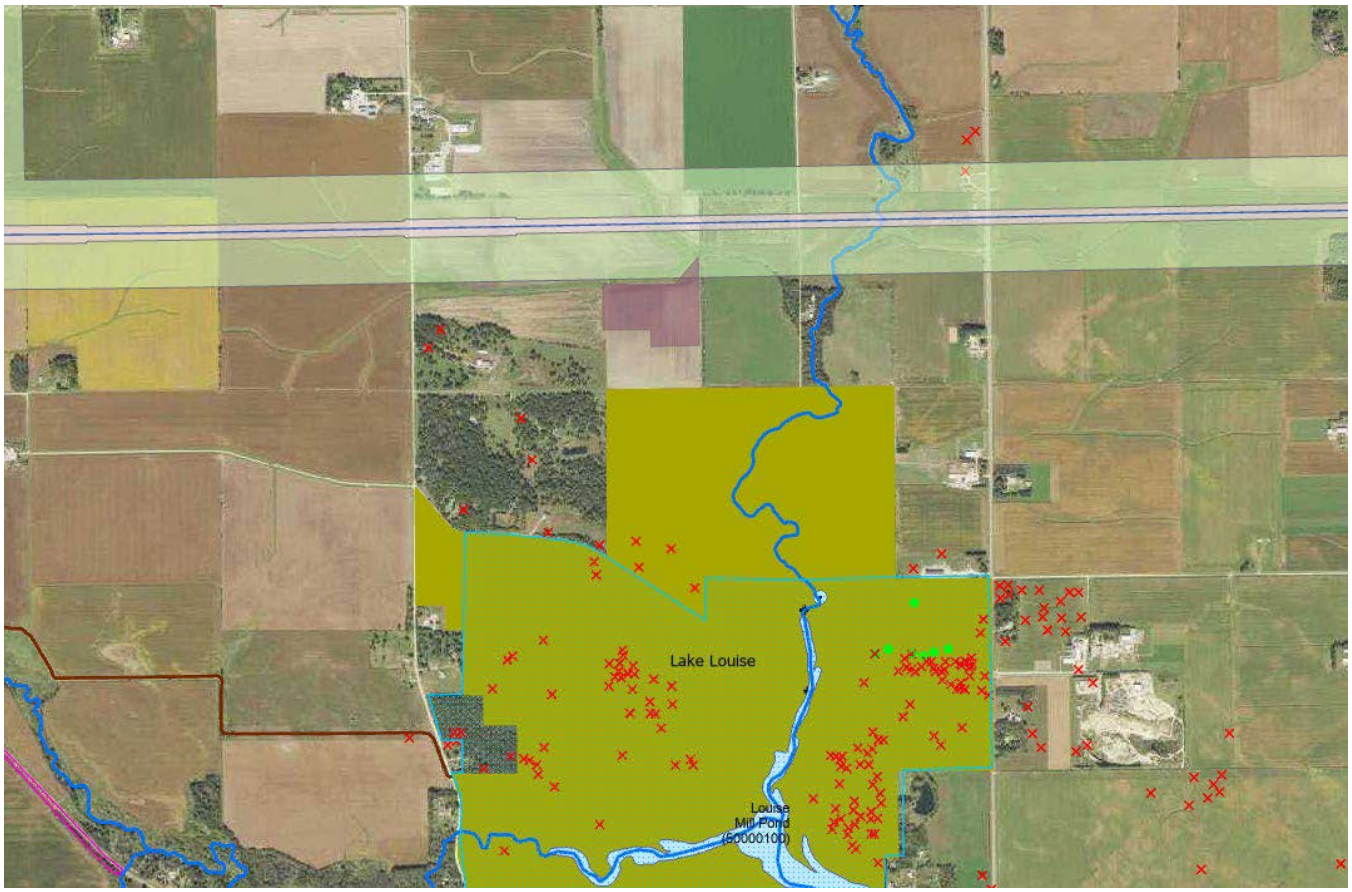
The Grand Meadow Chert Quarry/Wanhi Yukan Archaeological and Cultural Preserve is a significant cultural/historical site located north of Grand Meadow in Mower County, approximately 0.25-miles from the proposed route width. The site is on the National Register of Historic Places and is currently administered by the Mower County Historical Society. It was continuously used for over 8,000 years as a source of chert/flint stone for tool making. The potential visual impact of the project on this historic site should be considered.



The area of Mower County shown in the image above contains a mosaic of wildlife habitat and conservation land including the Rustic Retreat WMA, Shooting Star Prairie, RIM lands, and wetlands associated with the Upper Iowa River. In an area dominated by agriculture, wetlands, river corridors and conservation lands provide important wildlife habitat and migratory corridors.

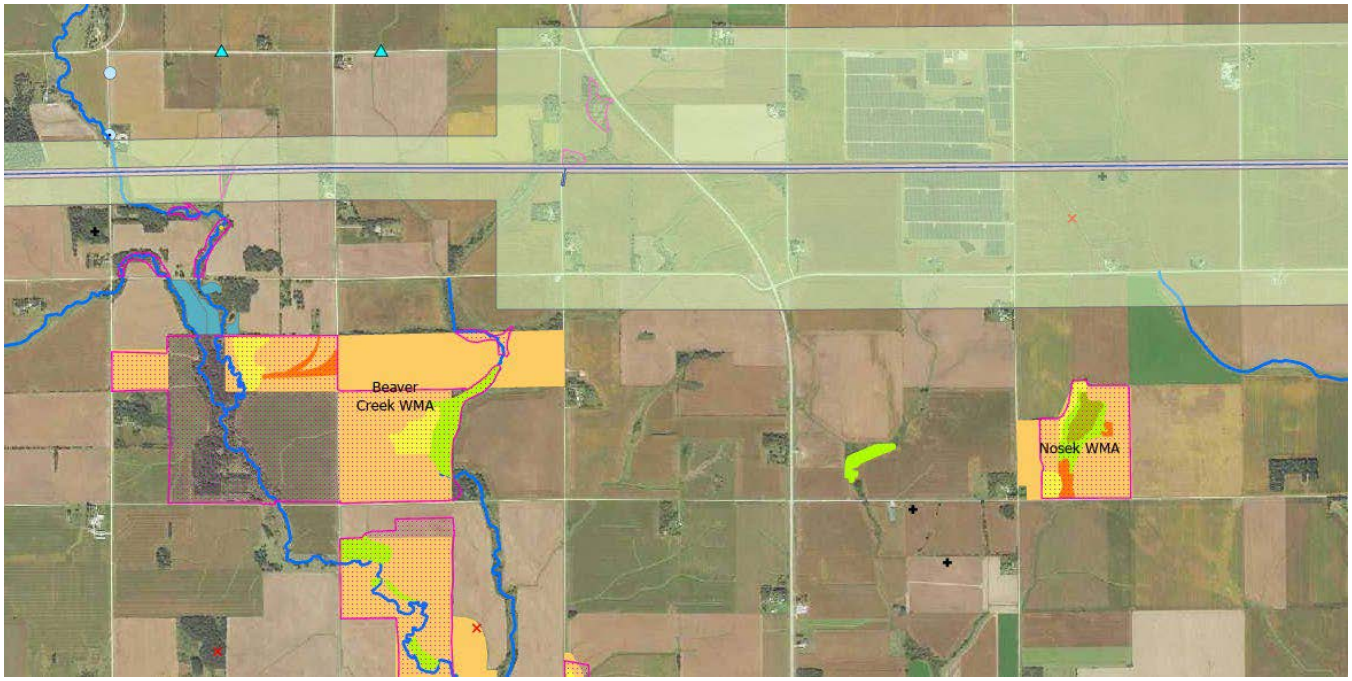
The brown line above depicts the Shooting Star State Trail that runs through the WMA, crosses the river and then runs parallel to the RIM easement before angling southeast and connecting to Lake Louise State Park. The proposed 765kV HVTL would be nearly double the height of the existing 161kV transmission line with a much greater visual impact to this natural area than what currently exists.

DNR advises that we are unlikely to approve of any ROW crossing of the SNA. We recommend sufficient setback to avoid impacting the WMA and SNA management activities. We recommend consideration of alternatives that would route around these sensitive areas.

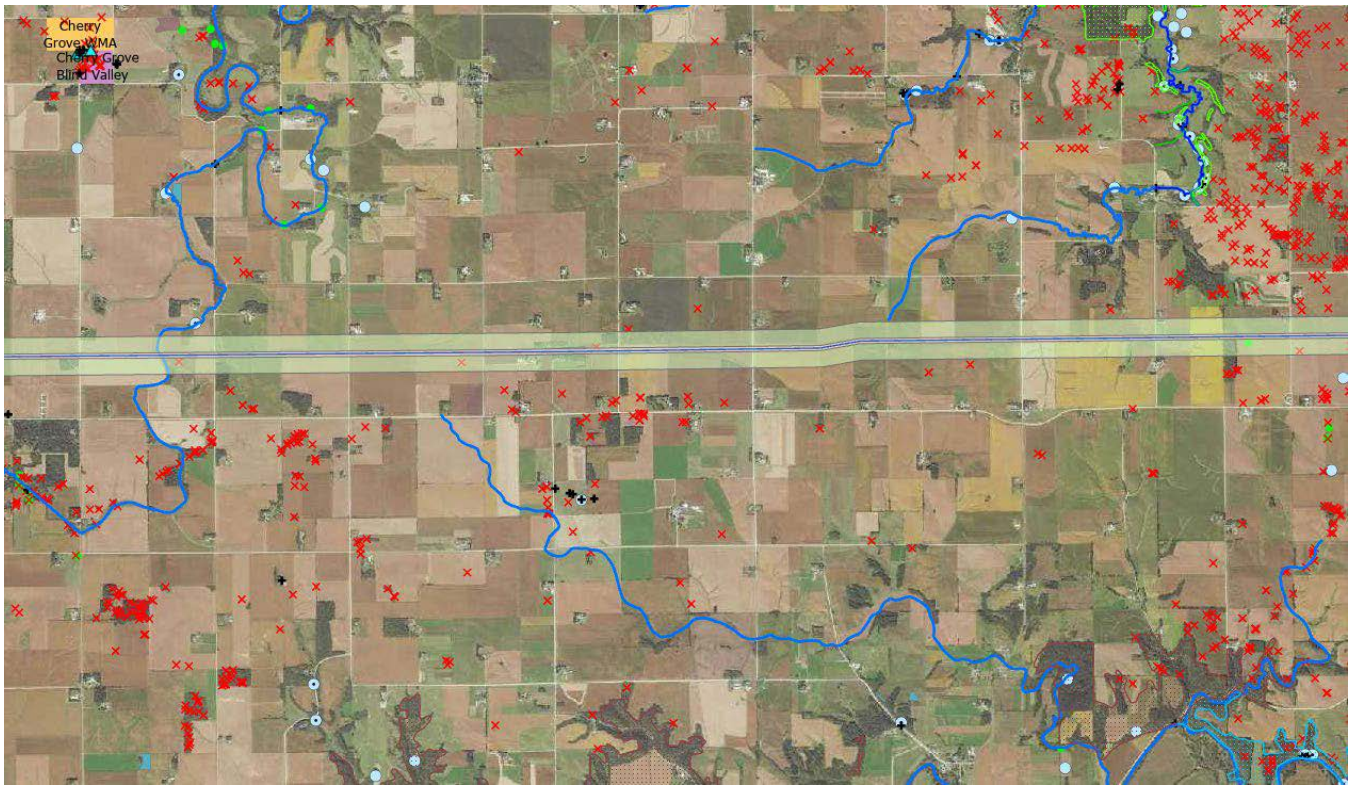


As previously discussed, the route passes in close proximity to Lake Louise State Park and DNR requests the preparation of a visual impact study to determine how the project could impact the experience of recreational users.

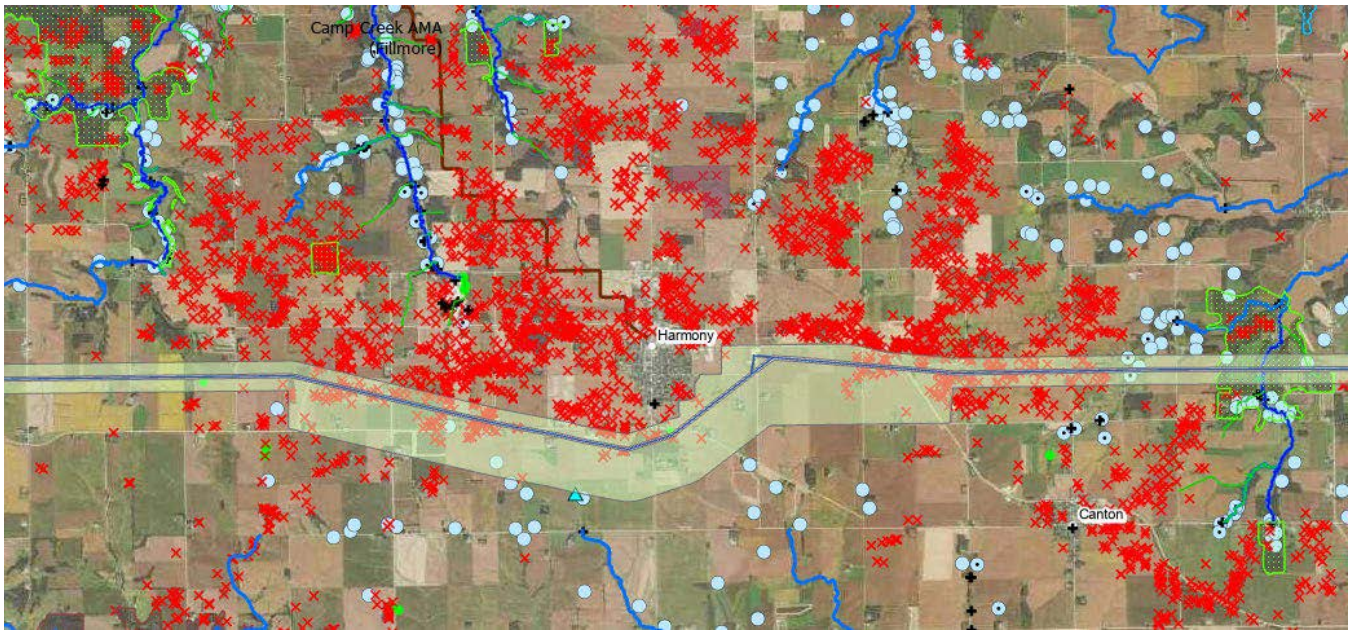
Fillmore County



Beaver Creek WMA and Nosek WMA are in close proximity to the expanded route width. The MBS Sites of Outstanding Biodiversity Significance that support many rare species within the WMAs also exist beyond the boundary of the WMAs and pockets would be crossed by the proposed route. A calcareous fen also exists in this area, and further coordination will be required to determine if project activities could impact the fen.

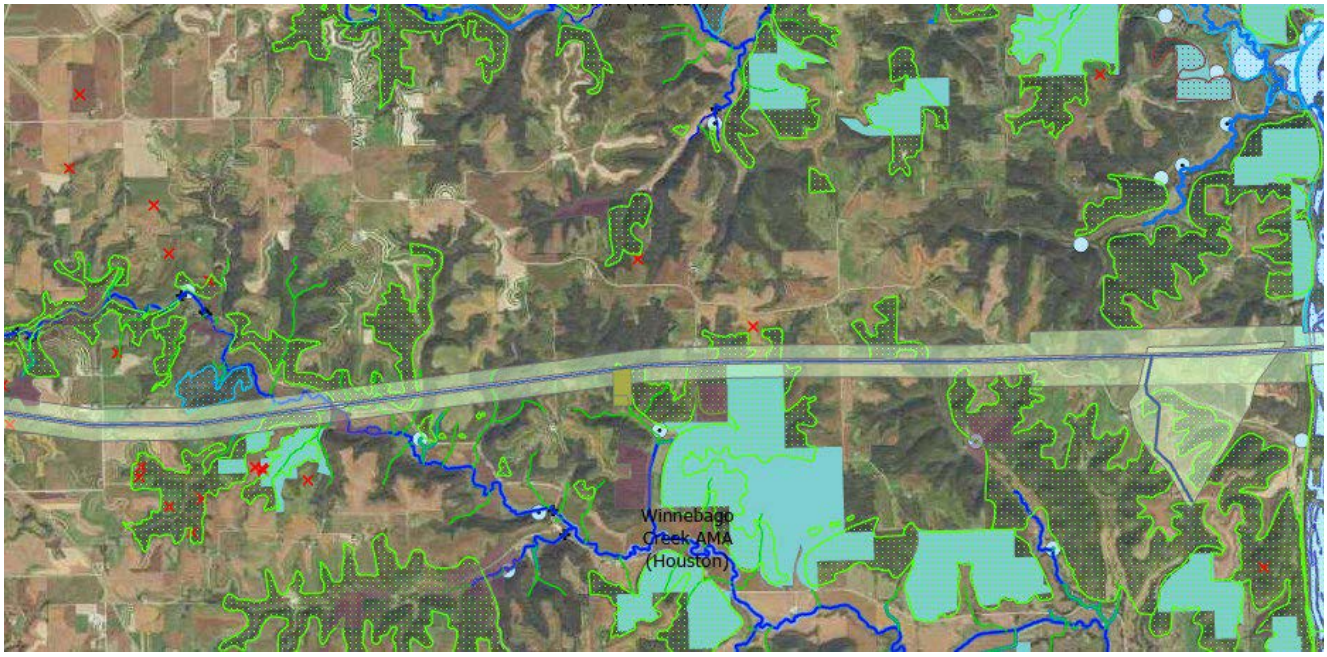


Extensive cave systems have been documented throughout the area and within one to two miles of the proposed route. These caves stretch on for miles, and the full extent of these systems is unknown. Any project that proposes deep foundations in this area is at risk of encountering large cavities that could pose challenges for structure stability. These caves also have unique ecosystems that are incredibly sensitive to any change in humidity, temperature, or water quality. The migration of grout or concrete during foundation construction could damage these delicate systems. Extensive geotechnical investigations by experts in karst geology will be needed throughout this area.

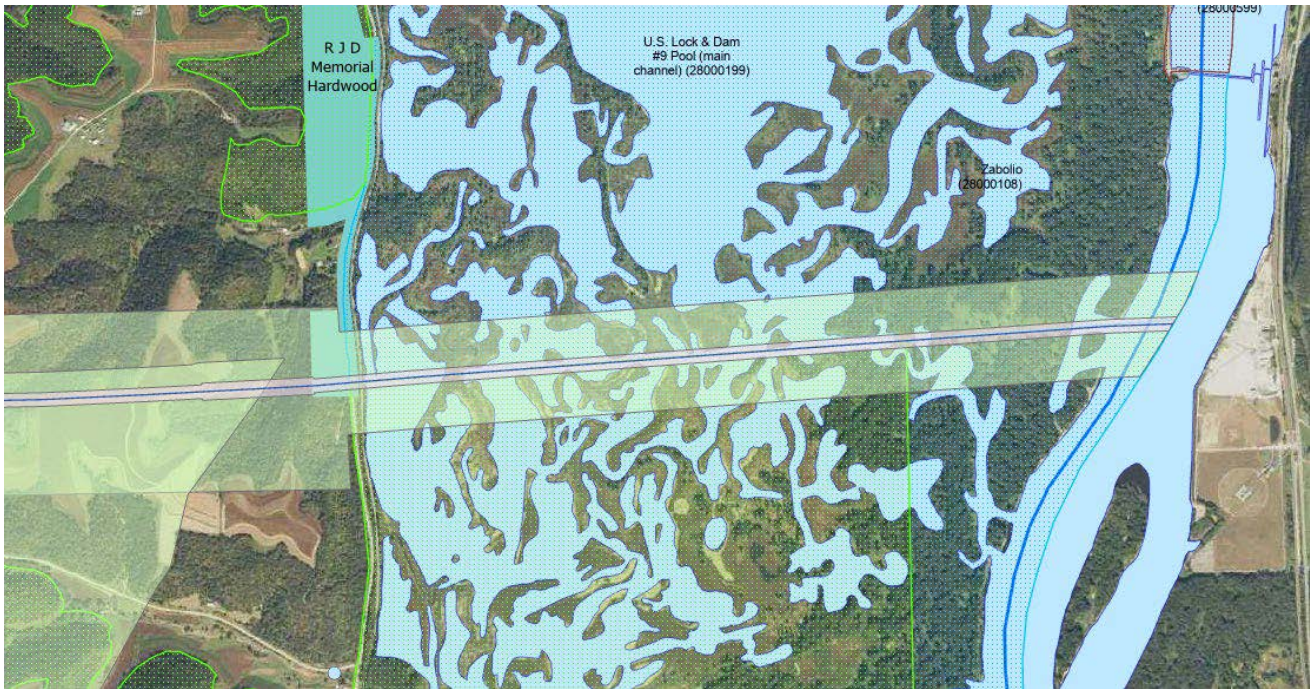


The route proposes to cross an area that contains some of the most densely documented karst features (sinkholes = red x; natural springs = blue dot) in the state. It will be challenging to find locations for structure siting that are geologically stable and maintain adequate setback from sinkholes. We recommend that extensive geotechnical investigations are conducted in this area by technical experts experienced with karst geology and that alternative routes be considered in case geotechnical studies find that a feasible route cannot be found. We also recommend that the maximum route 1.25-mile width be used throughout this entire area to allow for flexibility in route selection.

Houston County



The route through Houston County follows the existing 161kV route that was developed in the 1960's without clear consideration of natural resource impacts. The proposed route would need to expand the existing ROW by 170 feet, clearing trees and vegetation through MBS Sites, state forest, over trout streams, through AMAs, through extensive areas mapped with threatened and endangered species and over blufflands that are highly susceptible to erosion. Expanding the ROW in this area has the potential for much greater natural resource impacts than a new ROW would have in a less sensitive area. DNR recommends that the project include alternatives that utilize existing transportation corridors rather than further fragment and impact this sensitive ecological region.



The proposed crossing of the Mississippi River is located in an area that would greatly impact MBS Sites and NPCs containing floodplain forest. The existing ROW would need to be expanded resulting in an additional 170 feet of tree clearing in a sensitive ecological area. A new ROW that requires less tree clearing would be preferred to the proposed route. This area is located within a National Wildlife Refuge and contains extensive public waters. DNR coordinates closely with U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers on habitat maintenance and improvement projects throughout this area of the river and we request to be included in any coordination that occurs with USFWS regarding this crossing.

Next Steps

The DNR appreciates continued coordination with the proposer prior to the final route permit application submittal to the PUC with the goal of identifying solutions to the concerns raised in this letter. Our desire is to work through these issues together to find the least impactful route options that also work for Xcel Energy and Dairyland Cooperative.

Thank you again for your ongoing coordination. Please let us know if you have any questions.

Sincerely,



Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources
Phone: 651-259-5755
Email: melissa.collins@state.mn.us

CC: Kristin Lenz, Mergent
Tim Rogers, Xcel Energy
Samantha Bump, DNR Energy Planner
Haley Byron, DNR R4 Regional Environmental Assessment Ecologist
Theresa Ebbenga, DNR R4 Assistant Regional Manager
Melissa Kuskie, DNR EWR Division Director

Gopher to Badger Link Transmission Line Project
Minnesota Department of Natural Resources Monthly Call
September 22, 2026

Attendees

Minnesota Department of Natural Resources (MDNR): Melissa Collins, Haley Byron
Xcel Energy: Ellen Heine, Allison Ray
Dairyland Power Cooperative: Mike Peters
Merjent: Kristin Lenz, Dan Ryan, Jo Render

Discussion

Lenz reported the letter from MDNR dated August 31, 2026 was received. The Gopher to Badger Project (Project) team is working to complete its response and anticipates transmitting the response this week. Some revisions have been made to the Proposed Route width based on MDNR's suggestions. The response will include updated .shp files and a discussion of some of the alternatives considered in the route permit application. The Project team also provided an email with requested contact information to facilitate scheduling a meeting between MDNR and Project leadership. Collins confirmed that information was received. Lenz noted if the requested leadership call occurs before the response is transmitted, the Project team will make themselves available to schedule an additional meeting to respond to any questions that may arise once MDNR has a chance to review the project team's response.

Lenz noted the Minnesota Public Utilities Commission Energy Infrastructure Permitting (EIP) group is reviewing the draft application; the Project team has not received an update on when the EIP group may complete its review.

Lenz asked if there are any preferred dates and times for the leadership meeting. Collins noted information on scheduling the leadership call will come from Melissa Kuskie, Director, MDNR Ecological and Water Resources Division.

From: Kristin Lenz
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: Gopher to Badger 765kV HVTL - DNR Early Coordination Letter
Date: Friday, September 25, 2026 3:20:37 PM
Attachments: G2BL_MDNR_Early_Coordination_Response_20260925_Rev0.pdf

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From: Kristin Lenz
Sent: Friday, September 25, 2026 3:19 PM
To: 'Collins, Melissa (DNR)' <Melissa.Collins@state.mn.us>
Cc: Rogers, Timothy G <TIMOTHY.G.ROGERS@XCELENERGY.COM>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>; Haley Byron <Haley.Byron@state.mn.us>; Ebbenga, Theresa (DNR) <theresa.ebbenga@state.mn.us>; Kuskie, Melissa (MPCA) <melissa.kuskie@state.mn.us>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Michael Peters <Michael.Peters@DairylandPower.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: RE: Gopher to Badger 765kV HVTL - DNR Early Coordination Letter

Good afternoon Melissa,

Dairyland Power Cooperative (Dairyland) and Northern States Power Company (NSP), a Minnesota corporation, doing business as (d/b/a) Xcel Energy (Xcel Energy) (together, Applicants) appreciate the opportunity to coordinate with Minnesota Department of Natural Resources (MDNR) on the Gopher to Badger Link Project (Project) and provide the attached correspondence in response to MDNR's August 31, 2026 letter concerning the Project (MDNR Letter).

The Applicants have revised the Proposed Route to exclude the Racine Scientific Natural Area (SNA) and increase the Proposed Route width north of Lake Louise State Park and in the vicinity of the City of Harmony, as requested on pages 14, 16, and 18 of the MDNR Letter, respectively (see enclosed shapefile). During the August 25, 2026 meeting, the MDNR stated that they would like to obtain shapefiles of the route alternatives that were considered and

rejected by the Applicants in the draft Route Permit Application for review. These shapefiles are also enclosed for review.

Please reach out with any additional questions or comments.

Thank you,
Kristin Lenz
On behalf of the Applicants

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From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Sent: Monday, August 31, 2026 4:33 PM
To: Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Michael Peters <Michael.Peters@DairylandPower.com>
Cc: Kristin Lenz <kristin.lenz@merjent.com>; Rogers, Timothy G <TIMOTHY.G.ROGERS@XCELENERGY.COM>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>; Haley Byron <Haley.Byron@state.mn.us>; Ebbenga, Theresa (DNR) <theresa.ebbenga@state.mn.us>; Kuskie, Melissa (MPCA) <melissa.kuskie@state.mn.us>
Subject: EXTERNAL: Gopher to Badger 765kV HVTL - DNR Early Coordination Letter

CAUTION: This email originated from outside of Merjent.

Dear Ellen Heine and Michael Peters,
Please see the attached DNR early coordination letter regarding the proposed Gopher to Badger 765kV HVTL Project. A confirmation of receipt would be most appreciated.

Thank you,

Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Pronouns: She/her/hers
Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106

September 25, 2026 **VIA Email**

Melissa Collins
Regional Environmental Assessment Ecologist, Ecological and Water Resources
Minnesota Department of Natural Resources
Region 3 Headquarters
1200 Warner Road
St. Paul, MN 55106
melissa.collins@state.mn.us

Re: **Gopher to Badger Link 765 kilovolt (kV) High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear Melissa Collins,

Dairyland Power Cooperative (Dairyland) and Northern States Power Company (NSP), a Minnesota corporation, doing business as (d/b/a) Xcel Energy (Xcel Energy) (together, Applicants) appreciate the opportunity to coordinate with Minnesota Department of Natural Resources (MDNR) on the Gopher to Badger Link Project (Project) and provide this correspondence in response to MDNR's August 31, 2026 letter concerning the Project (MDNR Letter). The Applicants generally address the issues in the same order as presented in the MDNR Letter.

Pre-Application Coordination

MDNR expressed concern regarding the Applicants' coordination with MDNR in advance of filing a Route Permit Application (Application) with the Minnesota Public Utilities Commission (MPUC or Commission) this fall. The Applicants appreciate MDNR's interest in the Project and provide the following log reflecting the Applicants' engagement in multiple rounds of pre-Application coordination with MDNR:

- March 4, 2026: Applicants met with MDNR to provide a high-level introductory meeting of the Project, including Project update letter and map showing Segment 1 route options under consideration at that time, and Segment 2 Proposed Route.
- May 29, 2026: MDNR requested recurring meetings with Applicants regarding the Project. Applicants agreed and subsequent meetings were held.
- June 11, 2026: The Applicants submitted an NHIS review request to the MDNR.
- June 12, 2026: Applicants provided shapefiles of Proposed Route to MDNR Calcareous Fen Coordinator.
- June 16, 2026: Applicants met with MDNR Calcareous Fen Coordinator. Notes from this meeting were provided to the MDNR Regional Environmental Assessment Ecologist and MDNR Energy Planner.

- June 23, 2026: Recurring coordination meeting requested by MDNR held between Applicants and MDNR Regional Environmental Assessment Ecologist and Energy Planner. July 28, 2026: Recurring coordination meeting held between Applicants and MDNR Regional Environmental Assessment Ecologist and Energy Planner.

- August 12, 2026: Applicants provided shapefiles of Proposed Route, Proposed Right-of-Way, and Proposed Alignment to MDNR.

- August 25, 2026: Recurring coordination meeting between Applicants and MDNR Regional Environmental Assessment Ecologist and Energy Planner. The MDNR Lands & Minerals Division staff also participated in this meeting. The Applicants informed the MDNR that the draft Application had been submitted to the MPUC for review, and the Applicants intended to submit the final application this fall, potentially in October 2026.

- September 22, 2026: Recurring coordination meeting between Applicants and MDNR Regional Environmental Assessment Ecologist.

As noted by the MDNR, the Applicants sent an updated Project update letter with a map depicting the Proposed Route to the MDNR, in addition to the other federal, state, and local agencies and Tribal governments on August 12, 2026.

NHIS Review

As noted by the MDNR, the Applicants also submitted an Natural Heritage Information System (NHIS) review request to the MDNR on June 11, 2026 via the Minnesota Conservation Explorer (MCE), and as of the date of this letter, the June 11, 2026 review remains pending. The Applicants' consultants independently reviewed NHIS information available through their license, along with publicly available MDNR datasets for sites of biodiversity significance (SBS), native plant communities (NPCs), and calcareous fens. Accordingly, available NHIS was considered during route development. The Applicants will review and incorporate additional information provided through the pending MCE review as it becomes available. As indicated above, the Applicants also met with the Calcareous Fen Coordinator in June 2026.

MDNR's correspondence states that MDNR wished to explore route alternatives during pre-Application coordination that further limit impacts on natural resources. As described above, the Applicants have been coordinating with MDNR regarding the Project. In addition to MDNR coordination, the Applicants have been engaged in coordination with federal, state, and local agencies, as well as Tribes, landowners, and other stakeholders. All of those stakeholders raised a range of issues and impacts on natural resources that will be reflected in the Application. The Applicants have considered all of this input in developing the Proposed Route for both Segment 1 and Segment 2. Similarly, Minnesota law requires the Commission to consider a broad range of environmental, human settlement, land-use, engineering, reliability, and economic factors when designating a route. The Commission must also evaluate route alternatives, where applicable, and consider use of existing transmission routes and parallel highway rights-of-way (see Minn.

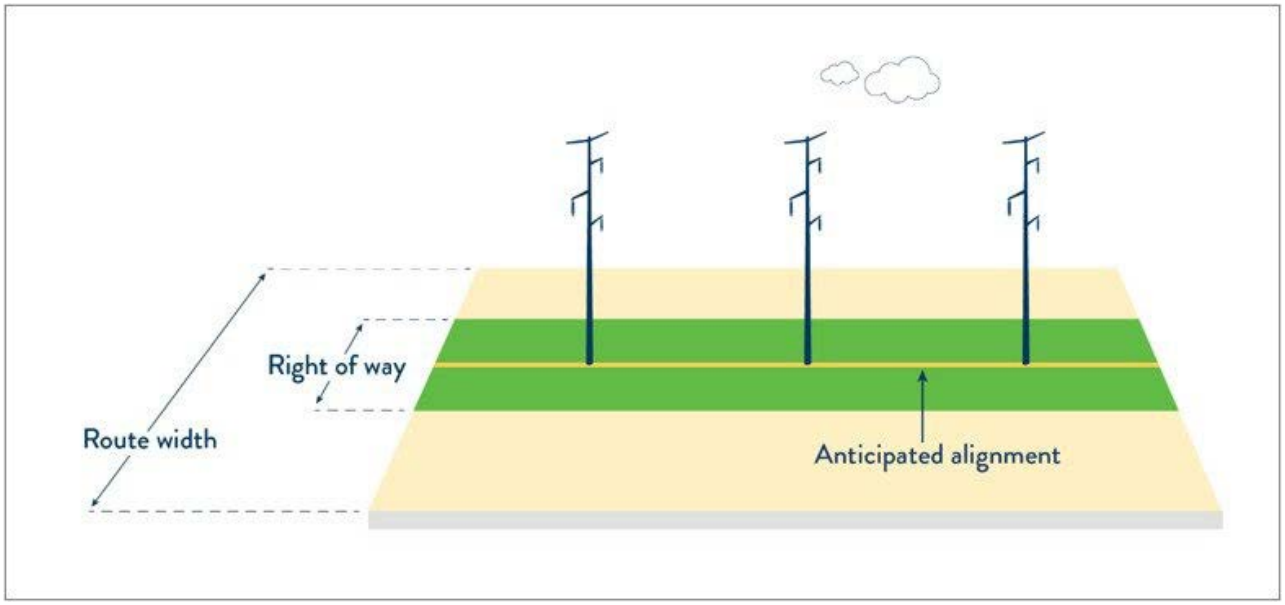
Stat. § 216I.05, subd. 11). The Applicants considered these factors, including the presence of sensitive natural resources, in developing and evaluating the Proposed Route.

The Applicants encouraged the MDNR to provide their comments and any suggested route alternatives to the MPUC during the scoping process in the Route Permit proceeding and also invited the MDNR to provide the Applicants with any written comments and specific route alternatives developed by the MDNR. During the June, July, and August meetings, the Applicants explained that, per the new 216I requirements, the Applicants would propose one route in the Application, but that there would be opportunities during the MPUC scoping process for agencies, Tribes, landowners and other stakeholders to suggest route alternatives.

Applicants' Consideration of Route Alternatives

As defined by Minn. Stat. § 216I.02, subd. 13, a route means a location for a high-voltage transmission line with a variable width of up to 1.25 miles (see Illustration 1 below). This definition is the basis for the MPUC issuing a Route Permit that identifies a designated route rather than a final centerline. A proposed route (or, route width) should be wide enough to provide flexibility for the permittee to address engineering issues and to work with landowners, agencies, and other external stakeholders to address concerns that may arise after a Route Permit is issued. The MDNR Letter provides some comments on the Proposed Route, to either expand or reduce the route width to allow for additional flexibility or to exclude features, respectively. However, the MDNR Letter also includes comments that the Applicants interpret as being related to Alignment Alternatives – specifically where the MDNR has not suggested a change in the Proposed Route but are suggesting a different crossing of a public land or water feature within the Proposed Route. The Applicants will continue to work with the MDNR regarding Alternative Alignments throughout the permitting process.

Illustration 1: Route Width, Right-of-Way and Alignment



The MDNR Letter includes discussion of the Applicants' consideration of route alternatives on Segment 1 and Segment 2. The Applicants provided an initial Project introduction letter identifying the route options being considered on May 1, 2026 (Initiation Letter) to the MDNR, in addition to other federal, state, and local agencies and Tribes. The Initiation Letter invited recipients to provide any information that the agency or Tribe might have to help identify potential route options or routing constraints.

The Applicants subsequently met with the MDNR in June, July and August 2026 to discuss the Project. During those meetings, MDNR identified general natural resource concerns but did not identify a preferred Segment 1 route option or suggest any specific alternative route. MDNR did express concerns with one of the segment options, segment L, which was in close proximity to the Haverhill WMA. The Applicants will not include that option in the Proposed Route.

On page 11 of the MDNR Letter, the MDNR states that the Proposed Route crosses the Zumbro River at a location with several SBS and a Dry Bedrock Bluff Prairie (Ups13c) NPC and that routing through those communities could pose ongoing challenges for prairie maintenance through prescribed burning and could eventually degrade these features. The MDNR also recommended crossing the river at a point that minimizes tree removal and impacts to SBS and avoids habitat fragmentation. However, as reflected in correspondence and maps previously provided to MDNR, the Applicants evaluated multiple route alternatives for Segment 1, including two possible crossings of the Zumbro River. Additional crossings were not advanced because of constraints associated with topography, Zumbro Lake, and significant residential development further south. Both of the Zumbro crossing options included in the preliminary route evaluation would result in impacts to SBS and NPC. The proposed crossing location was ultimately selected because in addition to the SBS and NPC, there were already multiple transmission line circuits (both existing and soon to be constructed) crossing the river at the southern crossing and a greater density of residential development on both sides of the river. The Applicants recognize the sensitivity of this area and will retain an approximately one-mile-wide Proposed Route width at the Zumbro River crossing to provide flexibility for continued alignment refinement in coordination with MDNR and other stakeholders during the routing and environmental review process.

With regard to Segment 2, as discussed above, the routing criteria set forth in regulations requires the Applicants to consider many factors when routing the transmission line, and the Commission must make a specific finding that the Commission considered locating a route for an HVTL on an existing high-voltage transmission route and using parallel existing highway right-of-way. While the Application will identify a number of high-level route alternatives for Segment 2 that were considered and rejected, it is important to note that the Midcontinent Independent System Operator (MISO) identified the Segment 2 portion of the Project as a co-location with Dairyland's existing 161 kilovolt (kV) transmission lines. Segment 2 presents an opportunity to reduce the number of new transmission routes in this area and avoid new habitat fragmentation, while also realizing the benefits of rebuilding the existing 161 kV transmission line. It is impractical to consider wholly relocating the existing 161 kV line as MDNR has suggested. As noted, the line has been in service for approximately 70 years, connecting to existing substations to provide reliable power to the local area. The Applicants invite MDNR to identify route alternatives that

would avoid specific resources of concern, either directly to the Applicants or during MPUC scoping, to support comparative evaluation of potential impacts.

The MDNR did not propose any route alternatives for either Segment 1 or Segment 2 in the MDNR Letter; however, the MDNR identified areas of resource concerns and asked that the Applicants consider either widening the Proposed Route width to provide additional alignment flexibility or reducing the Proposed Route width to exclude identified sensitive resources. The Applicants have revised the Proposed Route to exclude the Racine Scientific Natural Area (SNA) and increase the Proposed Route width north of Lake Louise State Park and in the vicinity of the City of Harmony, as requested on pages 14, 16, and 18 of the MDNR Letter, respectively (see enclosed shapefile). The Applicants will continue to coordinate with the MDNR to avoid site-specific resource features that the MDNR has identified on pages 11, 12, 13, and 15.

During the August 25, 2026 meeting, the MDNR stated that they would like to obtain shapefiles of the route alternatives that were considered and rejected by the Applicants in the Application for review. These shapefiles are enclosed for review.

Response to General Comments

Throughout the MDNR Letter, concerns are noted regarding habitat fragmentation and MDNR encourages the Applicants to avoid and minimize habitat fragmentation. We believe that the Proposed Route does minimize habitat fragmentation. Segment 1 is proposed to be co-located with approximately 2.8 miles of Minnesota Department of Transportation (MnDOT) and local roads, and approximately 0.3 miles of existing transmission lines (approximately 8 percent of Segment 1). Opportunities to further co-locate with existing transmission lines and transportation corridors are limited along this portion of the Project. The Proposed Right-of-Way is co-located with an existing transmission line right-of-way for approximately 98 miles, or 93 percent of Segment 2. Wherever the new 765 kV Proposed Route deviates from the current 161 kV transmission right-of-way, the 161 kV transmission line will be re-routed with the 765 kV alignment and the old structures removed, with limited exceptions such as at the Adams and Harmony substations, and the Jefferson Ridge Switching Station.

To minimize impacts to NPCs and SBS, the Applicants will minimize clearing limits, utilize existing access routes where practicable, avoid placement of structure work areas and staging areas within high-quality natural communities to the extent practicable, and restore temporarily disturbed areas in accordance with the Vegetation Management Plan.

No new substations will be developed as part of this Project. A switching station will be built in Houston County. The single circuit 161 kV component of the Project consists of less than 2 miles of transmission lines. Additionally, the Applicants will design the Project in accordance with applicable Avian Powerline Interaction Committee (APLIC) Avian Protection Plan Guidelines and APLIC Avian Safe Design recommendations. In coordination with the USFWS and MDNR, bird flight diverters, shield-wire marking, or other species-specific measures may be implemented in areas of elevated collision risk, including river crossings, wetland complexes, and known eagle use areas.

The Applicants will conduct tree clearing consistent with applicable USFWS guidance and requirements for locations associated with potential impacts to listed bat species.

Regarding indirect impacts, the Applicants are not aware of scientific studies indicating grassland passerine bird avoidance of electric transmission line structures.[1,2] The Applicants respectfully request MDNR share the citations for these studies to allow Applicants the opportunity for further review. The MPUC is responsible for preparing the Environmental Impact Statement (EIS); therefore, the Applicants recommend that MDNR submit its comments and supporting literature during scoping so that potential indirect effects on grassland birds and any appropriate mitigation measures may be considered in the environmental review as appropriate.

Minnesota Recreation System Units

State Parks

Neither the Proposed Right-of-Way nor the Proposed Route crosses a state park. The closest state park is Lake Louise State Park, which is approximately 0.4 miles south of the Proposed Right-of-Way and 0.3 miles south of the Proposed Route. As discussed above, the Applicants have enclosed a revised Proposed Route that increases the Proposed Route width north of Lake Louise State Park, as requested on page 16 of the MDNR Letter.

State Trails

The Proposed Route parallels the Great River Ridge State Trail; however, the Proposed Right-of-Way ranges from 0.8 and 1.5 miles west of this trail and does not cross it.

The Proposed Route and Proposed Right-of-Way cross the Shooting Star Trail as follows:

- **Crossing 1**: The existing 161 kV transmission line that would be rebuilt as part of the Project crosses the Shooting Star Trail approximately 550 feet from the Adams Substation before entering the substation. There is one existing 345 kV line, two existing 161 kV lines, and two existing 69 kV lines that cross the Shooting Star Trail at this same location to enter into the existing Adams Substation. The Shooting Star Trail runs parallel to State Highway 56 and is located approximately 0.9 mile southwest of a wind turbine associated with the Mower County Wind Energy Center and approximately 0.25 miles southwest of the Louise Solar Project.
- **Crossing 2**: The single circuit 765 kV line would cross the Shooting Star Trail approximately 0.6 mile east of the Adams Substation. The Shooting Star Trail runs parallel to State Highway 56 and is located approximately 0.4 mile southwest of a wind turbine associated with the Mower County Wind Energy Center and approximately 0.25 miles southeast of the Louise Solar Project.

[1] Walters, K., K. Kosciuch, and J. Jones. 2014. Can the Effect of Tall Structures on Birds Be Isolated from Other Aspects of Development? *Wildlife Society Bulletin* 38(2):250–256. Available online at: https://www.jstor.org/stable/wildsocibull2011.38.2.250. Accessed September 2026.
[2] Martin, C., E. Bork, and S. Nielsen. 2019. Effects of Industrial Linear Landscape Features on Grassland Songbirds. University of Alberta Rangeland Research Institute. Available online at: https://rri.ualberta.ca/wp-content/uploads/sites/48/2024/07/Martin-Bork-2019.pdfhttps://rri.ualberta.ca/wp-content/uploads/sites/48/2024/07/Martin-Bork-2019.pdf. Accessed September 2026.

- **Crossing 3**: The double circuit 765 kV / 161 kV transmission line would cross the Shooting Star Trail where the trail turns south along 740th Avenue. This is an open agricultural area. There is an existing 69 kV line that runs east-west and crosses the trail approximately 0.4 mile south along 740th Avenue. State Highway 56 is located approximately 0.6 mile southwest of the trail at this crossing location.

Existing energy infrastructure is a prominent component of the existing visual environment at the proposed crossings 1 and 2 of the Shooting Star Trail, and to a lesser extent at crossing 3. The Applicants will continue to coordinate with the MDNR on the best alignment through this area.

State Water Trails

Avoiding crossing the Zumbro River is not possible because of the location of the Project endpoints (North Rochester Substation and the Mississippi River) in relation to the multiple forks of the Zumbro River. The Applicants have proposed an approximately 1-mile route width at the proposed Zumbro River crossing in order to continue coordination with the MDNR, and other stakeholders, on the best alignment through this area.

Because the Project is part of a planned 765 kV transmission path connecting Minnesota, South Dakota, Iowa, and Wisconsin, avoiding a crossing of the Mississippi River is not feasible. The area around the Mississippi River at the proposed crossing location is managed by the U.S. Fish and Wildlife Service (USFWS) Upper Mississippi National Wildlife and Fish Refuge (NWFR). Dairyland maintains the existing Q-7/Q-9 161 kV transmission lines crossing of the Mississippi River at this location. The Applicants selected this crossing location to minimize new or additional right-of-way within the USFWS NWFR and to avoid and minimize impacts to other human and environmental resources. Dairyland's existing right-of-way for the Q-7/Q-9 is approximately 200 feet wide and will not require expansion. To accommodate the new 765/161 kV double circuit configuration and utilize the existing right-of-way width, the portion of the Q-9 161 kV line from the Genoa Substation across the Mississippi River west into Minnesota will be retired and removed. The existing 161 kV transmission lines through this area consist of approximately 28 existing wooden H-frame structures, and two lattice structures on the western banks of the Mississippi River. These structures will be replaced with approximately eight double circuit lattice structures with a priority on placing structures within existing disturbance footprints where practicable, resulting in approximately 22 fewer structures within the Upper Mississippi NWFR. The final number of structures and locations are subject to change based on future studies, engineering, and surveys, and coordination with the USFWS. The Applicants are coordinating with the USFWS NWFR to pursue the approvals that will be required for the proposed crossing location.

The Applicants have assessed other crossing locations along the Mississippi River. The Applicants have enclosed shapefiles of these crossing alternatives for MDNR review.

Wildlife Management Areas

The Rustic Retreat WMA is crossed by the Proposed Route, but is approximately 0.4 mile north of the Proposed Right-of-Way and is not proposed to be impacted.

The Beaver Creek WMA is located 0.7 mile south of the Proposed Right-of-Way and 500 feet to 0.6 mile south of the Proposed Route and is not proposed to be impacted.

The Nosek WMA is located 1 mile south of the Proposed Right-of-Way and 0.3 mile south of the Proposed Route and is not proposed to be impacted.

Aquatic Management Areas

The Project is proposed to cross the Winnebago Creek AMA along Dairyland's existing 161 kV transmission line. A wider right-of-way would be required at this crossing, impacting approximately 1.1 acres of the AMA. The Applicants requested the Lands and Minerals Division staff's attendance during the August 25, 2026 meeting with the intent of discussing this and the other MDNR public lands and waters crossings to understand if the MDNR had any specific route concerns or recommendations. However, the MDNR Lands & Minerals staff communicated during that meeting that they had not yet had the opportunity to review the Project crossings of the MDNR public lands or waters crossings. The Applicants will continue to coordinate with the MDNR on the best alignment through this area.

State Forest

The Richard J. Dorer Memorial Hardwood State Forest encompasses more than 1 million acres in southeastern Minnesota and consists of a mosaic of non-contiguous public and private lands distributed throughout the Project area. The Proposed Right-of-Way would cross one tract of the Richard J. Dorer Memorial Hardwood State Forest along its existing 161 kV transmission line in Houston County adjacent to the Mississippi River. In an effort to limit the impacts across the USFWS Upper Mississippi NWFR and the Mississippi River, impacts to this parcel are likely unavoidable. The Applicants will continue to coordinate with the MDNR on the best alignment through this area.

Scientific and Natural Areas

Minnesota's Outdoor Recreation System classification identifies SNAs as lands managed for the preservation and protection of areas containing natural features of exceptional scientific and educational value (Minn. Stat. § 86A.05, subd. 5). Similarly, transmission line routing criteria require consideration of effects on rare and unique natural resources and public conservation lands during route selection. Consistent with these policies, the Applicants sought to avoid and minimize impacts to SNAs during route development and incorporated additional route width in the vicinity of the Racine Prairie and Shooting Star Prairie SNAs to provide flexibility during final alignment selection.

The wider Proposed Routes in these locations allow the Applicants to refine the final centerline, structure placements, access routes, and other design features during detailed engineering to avoid or minimize impacts to SNAs and other sensitive environmental resources to the extent

practicable. Consequently, the Proposed Route represents the route corridor evaluated for permitting purposes and does not indicate that the final transmission line alignment will necessarily cross these protected natural areas. Rather, the expanded Proposed Route was intentionally developed to provide opportunities to avoid or reduce impacts to SNAs, wetlands, cultural resources, residences, and other environmental constraints during subsequent project design.

In response to MDNR's request, the Applicants have since revised the Proposed Route to exclude the Racine SNA. This revised Proposed Route shapefile is enclosed.

The Applicants have proposed the maximum 1.25-mile wide Proposed Route in the vicinity of the Shooting Star SNA. The Applicants' Proposed Right-of-Way would utilize Dairyland's existing 161 kV transmission line corridor; however, a wider right-of-way will be needed, which overlaps approximately 0.03 acres of the Shooting Star SNA. Other constraints that should be considered when evaluating alignment options in this area include:

- a residence on the corner of State Highway 56 and 730th Avenue;
- additional residences along State Highway 56 and 140th Street to the north;
- the forested valley of the Upper Iowa River, an MDNR public water, extends north and south of the Proposed Right-of-Way through this area; and
- Shooting Star Trail parallels the route for approximately 1 mile through this area.

In addition, it is the Applicants' understanding that the MDNR does not want the transmission line located farther to the south of the proposed location because of the proximity to Lake Louise State Park.

During the August 25, 2026 meeting with the MDNR, the Applicants inquired if the MDNR had more precise boundary data for the Shooting Star SNA because aerial photos indicate that the area of apparent overlap may be within county road right-of-way. The MDNR confirmed that they did not have more accurate boundary geospatial data, but provided the legal description of the SNA. The Applicants have completed cadastral surveys of the SNA and have confirmed that the Proposed Right-of-Way overlaps the SNA boundary by approximately 45 feet.

The Applicants will continue to work with the MDNR to identify the best alignment through this area.

Utility Crossing License & Access Agreements

The Applicants understand these requirements and will pursue the appropriate licenses and short-term leases after the MPUC proceedings are complete.

State-listed Species

As noted by the MDNR, the Applicants did submit an NHIS review request to the MDNR on June 11, 2026, and as of the date of this letter, the Applicants have not received a response from the MDNR. Although the June 11, 2026 MCE review remains pending, the Applicants' consultants

reviewed NHIS information available through their license, along with publicly available MDNR datasets for SBS, NPCs, and calcareous fens. Accordingly, available NHIS was considered during route development. The Applicants will review and incorporate additional information provided through the pending MCE review as it becomes available. As indicated above, the Applicants also met with the Calcareous Fen Coordinator in June 2026. The Applicants have used the best available information to prepare the draft Application and will provide any additional information received from MDNR to the MPUC for consideration in the EIS.

The Applicants anticipate additional consultation with the MDNR during the planning and permitting processes regarding state-listed species, which may include:

- Updating the NHIS review, which expires annually;
- Potentially performing pre-construction habitat or presence/absence surveys on the route selected by the Commission;
- Micro-siting of the alignment and/or structures to avoid sensitive areas identified in desktop assessments or field surveys;
- Adherence to seasonal work restrictions;
- Biological monitoring;
- Avoidance buffers/exclusion fencing around sensitive areas; and
- Habitat restoration measures.

Native Plant Communities and Sites of Biodiversity Significance and Sensitive Ecological Areas

To minimize impacts to NPCs and SBS, the Applicants will minimize clearing limits, utilize existing access routes where practicable, avoid placement of structure work areas and staging areas within high-quality natural communities to the extent practicable, and restore temporarily disturbed areas in accordance with the Vegetation Management Plan.

RIM and CREP Land

The Applicants met with the Minnesota Board of Soil and Water Resources (BWSR) to discuss the Proposed Right-of-Way crossings of conservation easements managed by BWSR. The Applicants will continue to coordinate with BWSR throughout the planning and permitting process.

Vegetation Management Plan (VMP)

The Applicants' draft VMP will be included with the Application.

Wetlands, Rivers and Trout Streams

Zumbro River

The Applicants have proposed an approximately 1-mile wide Proposed Route at the Zumbro River crossing in order to continue coordination with the MDNR, and other stakeholders, on the best alignment through this area.

Root River

The Applicants have proposed a wider Proposed Route in the vicinity of the Root River because of the proximity of the Rochester International Airport and need for flexibility in designing the alignment to comply with Federal Aviation Administration height limitations. The High Forest 35 calcareous fen is also located in this general vicinity. As discussed above, the wider Proposed Route allows the Applicants to refine the final centerline, structure placements, access routes, and other design features during detailed engineering to avoid or minimize impacts to calcareous fens and other sensitive environmental resources to the extent practicable. Consequently, the Proposed Route represents the route corridor evaluated for permitting purposes and does not indicate that the final transmission line alignment will necessarily cross these natural areas. Rather, the expanded Proposed Route was intentionally developed to provide opportunities to avoid or reduce impacts to calcareous fens, wetlands, cultural resources, residences, and other environmental constraints during subsequent Project design.

Frego Creek

The Proposed Right-of-Way would cross Frego Creek along Dairyland's existing 161 kV transmission line corridor. Use of the existing corridor would minimize additional tree clearing and habitat fragmentation. The Applicants will continue to coordinate with MDNR regarding alignment and appropriate avoidance and minimization measures in this area.

Riceford Creek

The Proposed Right-of-Way would cross Riceford Creek along Dairyland's existing 161 kV transmission line corridor. Use of the existing corridor would minimize additional tree clearing and habitat fragmentation. The Applicants will continue to coordinate with MDNR regarding alignment and appropriate avoidance and minimization measures in this area.

Winnebago Creek

As discussed above, the Project is proposed to cross the Winnebago Creek AMA along Dairyland's existing 161 kV transmission line corridor. A wider right-of-way would be required at this crossing, impacting approximately 1.1 acres of the AMA. The Applicants requested the Lands and Minerals Division staff's attendance during the August 25, 2026 meeting with the intent of discussing this and the other MDNR public lands and waters crossings to understand if the MDNR had any specific route concerns or recommendations. However, the MDNR Lands & Minerals staff communicated during that meeting that they had not yet had the opportunity to review the Project crossings of the MDNR public lands or waters crossings. The Applicants will continue to coordinate with the MDNR on the best alignment through this area.

Calcareous Fens

The Applicants met with the MDNR Calcareous Fen Program Coordinator, as recommended by the MDNR during the March 4, 2026 meeting, on June 16, 2026. The Applicants provided a shapefile of the Proposed Alignment to the MDNR Calcareous Fen Program Coordinator on June 12, 2026 prior to the meeting. Notes from this meeting were provided to the MDNR Regional Environmental Assessment Ecologist and MDNR Energy Planner. The Applicants will continue to coordinate with the MDNR Calcareous Fen Program Coordinator throughout the planning and permitting process.

Rare Natural Communities

The Applicants have reviewed MDNR's RNC dataset[3] and did not identify a designated RNC within the Proposed Right-of-Way or the Proposed Route. The Applicants did identify areas mapped in MDNR's potential RNC[4] dataset that intersect the Proposed Right-of-Way and the Proposed Route.

Public Waters Permits

Construction dewatering activities are sometimes required during the installation of transmission structures and would be informed by geotechnical investigations conducted prior to construction. The Applicants will obtain a MDNR water-appropriation permit if anticipated dewatering would exceed 10,000 gallons per day or 1 million gallons per year, or if otherwise required under applicable MDNR requirements. The Applicants will also apply for a Work in Public Waters Permit for any anticipated activities occurring below the ordinary high-water mark of a public water.

Karst Geology

Collection of geotechnical data is necessary for final design of the transmission line foundations and will be performed in one or more mobilizations during the design phase. The Applicants recognize that the Project is located in a region of Minnesota known to have karst features. The MDNR, in its early coordination comments, noted the presence of karst in the Project area, noting that several karst features have been documented within 1,000 feet of the Project area. Karst landscapes can develop where the dissolution of soluble bedrock can result in voids, sinkholes, springs, caves, or other such features at or near the surface.[5] This necessitates planning to identify karst features prior to construction, as well as development of a contingency plan should karst features be encountered during construction.

The Applicants will develop a Karst Survey Plan identifying the locations of the proposed geotechnical investigations in relation to proposed structure locations and the extent and potential impact of subsurface features. This Karst Survey Plan may include site reconnaissance by a

[3] MDNR. 2026. Rare Natural Communities. Available online at: https://gis.data.mn.gov/datasets/minnesota::rare-natural-communities-3/explore?location=46.435000%2C-93.380000%2C7. Accessed August 2026.
[4] MDNR. 2026. Potential Rare Natural Communities. Available online at: https://gis.data.mn.gov/datasets/potential-rare-natural-communities-1/explore?location=46.435000%2C-93.380000%2C7&showTable=true. Accessed August 2026.
[5] National Park Service. 2022. Karst Landscapes. Available online at: https://www.nps.gov/subjects/caves/karst-landscapes.htm. Accessed July 2026.

geologist and/or geotechnical engineer, geophysical studies, additional soil borings, or other geotechnical investigation methods as appropriate.

Following completion of the Karst Survey Plan outlined above, the Applicants will develop a Karst Contingency Plan prior to construction that includes actions to take to mitigate any unexpected voids encountered during construction.

Comments by County (North to South)

Wabasha County

The Applicants have proposed an approximately 1-mile wide Proposed Route at the Zumbro River crossing (page 11 of the MDNR Letter) in order to continue coordination with the MDNR, and other stakeholders, on the best alignment through this area.

Olmsted County

As described in the Karst Geology response above, the Applicants will develop a Karst Survey Plan and a Karst Contingency Plan. These plans will address the proposed structure locations in the area identified on page 12 of the MDNR Letter, and appropriate investigation and contingency measures.

The Applicants have proposed a wider Proposed Route in the vicinity of the Root River, identified on page 13 of the MDNR Letter, because of the proximity of the Rochester International Airport and need for flexibility in designing the alignment to comply with Federal Aviation Administration height limitations. The High Forest 35 calcareous fen is also located in this general vicinity. As discussed above, the wider Proposed Route allows the Applicants to refine the final centerline, structure placements, access routes, and other design features during detailed engineering to avoid or minimize impacts to calcareous fens and other sensitive environmental resources to the extent practicable. Consequently, the Proposed Route represents the route area evaluated for permitting purposes and does not indicate that the final transmission line right-of-way will necessarily cross these natural areas. Rather, the expanded Proposed Route was intentionally developed to provide opportunities to avoid or reduce impacts to calcareous fens, wetlands, cultural resources, residences, and other environmental constraints during subsequent project design.

Mower County

In response to MDNR's request, the Applicants have revised the Proposed Route to exclude the Racine SNA identified on page 14 of the MDNR Letter. This revised Proposed Route shapefile is enclosed with this Letter. The Applicants have also conducted a Phase Ia Cultural Resources Literature Review for the Proposed Routes and a 1-mile buffer and have initiated consultation with the State Historic Preservation Office.

The Applicants agree that there are many routing constraints in the area identified on page 15 of the MDNR Letter and will continue to work with the MDNR to identify the best alignment through this area. The Applicants invite the MDNR to provide a Proposed Route alternative through this section considering several of the routing constraints are MDNR-managed resources, including

the Shooting Star Trail, Shooting Star SNA, Lake Louise State Park, and Upper Iowa River public water.

The Applicants suggest that the MDNR provide the comments provided on page 16 of the MDNR Letter to the MPUC during the scoping process for further evaluation.

Fillmore County

As discussed above, neither the Beaver Creek WMA nor the Nosek WMA, identified on page 17 of the MDNR Letter, are crossed by the Proposed Route. The Applicants have initiated coordination with the MDNR Calcareous Fen Program Coordinator.

As recommended by the MDNR, the Applicants have revised the Proposed Route through the area identified on page 18 of the MDNR Letter to the 1.25-mile maximum width to allow additional flexibility in siting the alignment. The revised Proposed Route shapefile is enclosed for MDNR review.

As described in the Karst Geology response above, the Applicants will develop a Karst Survey Plan and a Karst Contingency Plan. These plans will address the proposed structure locations in the areas identified on pages 17 and 18 of the MDNR Letter and appropriate investigation and contingency measures.

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 2, 2026

Hannah Phelps
Merjent, Inc.

RE: Natural Heritage Review of the proposed Gopher to Badger Link Transmission Line Project, Fillmore, Goodhue, Houston, Mower, Olmsted, and Wabasha Counties

Dear Hannah Phelps,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2026-00499** 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:

Ecologically Significant Areas

- The proposed project overlaps or is very close to 25 Sites of Biological Significance. There are three ranked as *Outstanding*, six ranked as *High*, and 16 ranked as *Moderate*. 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. There are almost 100 mapped native plant communities (NPCs) near the proposed project in these Sites. These NPCs have state conservation ranks ranging from Critically Imperiled (S1) to Apparently secure, Uncommon but not rare (S4). NPCs ranked S1 through S3 are considered rare in Minnesota. A list of all Sites of Biodiversity Significance and NPCs can be found in the Conservation Planning Report (GopherToBadgerLinkTransmissionLine.pdf) attached to this project's MCE page. Note that some of these NPCs contain groundwater dependent species that could be impacted by changes in groundwater hydrology. Some of these groundwater dependent species are linked to calcareous fens but others are not. The DNR recommends that the project be designed to avoid impacts on these ecologically significant areas. Actions to avoid or minimize disturbance include, but are not limited to, the following recommendations:
    - Avoid MBS Sites and native plant communities ranked S1, S2, or S3.
    - As much as possible, operate within already-disturbed areas.
    - Minimize vehicular disturbance in MBS Sites (allow only vehicles/equipment necessary for construction activities).
    - Do not park equipment or stockpile supplies in the MBS Sites.

- Do not place spoil in MBS Sites or other sensitive areas.
- Impacts to MBS Sites and native plant communities should be addressed in the vegetation management plan.
- If possible, conduct the work under frozen ground conditions.
- Use effective erosion prevention and sediment control measures.
- Inspect and clean equipment prior to operation and follow recommendations to prevent the spread of invasive species.
- Revegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible.
- Use only weed-free mulches, topsoils, and seed mixes. Of particular concern are birdsfoot trefoil (*Lotus corniculatus*) and crown vetch (*Coronilla varia*), two invasive species that are sold commercially and are problematic in prairies and disturbed open areas.

- The Minnesota Biological Survey (MBS) considered 12 areas near the proposed project for Sites of Biodiversity Significance. They were determined to be *Below* the minimum biodiversity threshold for statewide significance. These areas, however, may have conservation value at the local level as habitat for native plants and animals, corridors for animal movements, buffers surrounding higher quality natural areas, or as areas with high potential for restoration of native habitat. As such, indirect impacts from surface runoff or the spread of invasive species should be considered during project design and implementation.

- Pool 8 of the Mississippi River has been identified as a Lake of *Outstanding* Biological Significance. Lakes of Biological Significance were ranked as *Outstanding, High, or Moderate* based on unique plant and animal presence. It is important that effective erosion prevention and sediment control practices be implemented and maintained near lakes throughout the project. Indirect impacts, such as the introduction or spread of invasive species, should also be considered and minimized.

- The proposed project crosses two Important Bird Areas (IBAs) – the Blufflands-Root River IBA and Upper Mississippi Valley NWR IBA. Important Birds Areas, identified by Audubon Minnesota in partnership with the DNR, are part of an international conservation effort aimed at conserving critical bird habitats. They are voluntary and non-regulatory, but the designation does demonstrate the biological value of this surrounding area.

    - The Blufflands-Root River IBA is marked by deep river valleys, steep riverbanks, floodplain forests and upland deciduous forests. This habitat mix supports not only a significant number of breeding species but provides important migratory stopover habitat in a landscape otherwise dominated by agricultural fields.

    - The Upper Mississippi Valley NWR has recorded 305 species of birds, 133 of which are known to breed there. The IBA is an important site for migrating waterfowl. Nineteen species of waterfowl have been recorded during fall migration on the Upper Mississippi River NWR. Among the most notable fall concentrations are those of canvasbacks, representing up to 50% of the continental population, and tundra swans with an estimated 20% of the eastern North American population. While the number of wintering eagles in Minnesota is not as high as portions of the river further south, the lock and dam system and wooded cliffs provide excellent winter bald eagle habitat.

- Ecologically significant areas can be viewed using the Explore page in Minnesota Conservation Explorer (MCE) or their GIS shapefiles can be downloaded from the MN Geospatial Commons. Reference the MBS Site Biodiversity Significance and Native Plant Community websites for information on interpreting the data. A Conservation Planning Report with a list of ecologically significant areas in the vicinity of this project has been created and is attached to the MCE Project page.

- Nine calcareous fens (see Conservation Planning Report for a list) have been documented within the vicinity of the proposed project area. Sterile sedge (*Carex sterilis*) and edible valerian (*Valeriana edulis* var. *ciliata*), state-listed threatened plants, have been documented within the fens. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act, authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. 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. 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.

  Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g., groundwater pumping, contamination, or discharge). To ensure compliance with WCA, please contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us). **If it is determined the project will impact the fen in any way, including indirect impacts through the alteration of hydrological conditions, a botanical survey is required**. Surveys must be conducted by a qualified surveyor and follow the standards contained in the Rare Species Survey Process and Rare Plant Guidance. Visit the Natural Heritage Review page for a list of certified surveyors and more information on this process. Survey proposals should be submitted to Reports.NHIS@state.mn.us prior to initiating survey work. Project planning should take into account that any botanical survey needs to be conducted during the appropriate time of the year, which may be limited. Please consult Review.NHIS@state.mn.us if you have any questions regarding this process.

- If the Wetland Conservation Act (WCA) is applicable to this project, please note that Native Plant Communities with a Conservation Status Rank of S1 through S3 or wetlands within *High* or *Outstanding* MBS Sites of Biodiversity Significance may qualify as Rare Natural Communities (RNC) under WCA. Minnesota Rules, part 8420.0515, subpart 3 states that a wetland replacement plan for activities that modify a RNC must be denied if the local government unit determines the proposed activities will permanently adversely affect the RNC. 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 RNC Technical Guidance.

State-listed Species

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 endangered or threatened plants or animals, including their parts or seeds, without a permit.

Plants

- Many state-listed plant species have been documented within the vicinity of the proposed project; these are listed in the table below and includes recently documented (2026) records. **All known occurrences of state-listed endangered and threatened plant species and all their potential habitats must be avoided**. Given that the right-of-way is regularly maintained, spanning is not considered avoidance. If avoidance is not feasible, a qualified surveyor will need to (1) resurvey known occurrences and (2) conduct a habitat assessment to determine if suitable habitat exists within the activity impact area and, if so, conduct a rare plant survey prior to any project activities. The goal of the habitat assessment is to identify potential locations where endangered (END) and threatened (THR) species may occur to help formulate an avoidance plan. If state-listed endangered or threatened species are within the permitted right-of-way, a take permit will likely be needed. Species of special concern (SPC) are not protected under Minnesota's endangered species law; however, we encourage project alternatives that avoid or minimize impacts to known occurrences of species of special concern.

  Surveys must be conducted by a qualified surveyor and follow the standards contained in the Rare Species Survey Process and Rare Plant Guidance. Visit the Natural Heritage Review page for a list of certified surveyors and more information on this process. Survey proposals should be submitted to Reports.NHIS@state.mn.us prior to initiating survey work. Project planning should take into account that any botanical survey needs to be conducted during the appropriate time of the year, which may be limited. Please consult Review.NHIS@state.mn.us if you have any questions regarding this process.

MN Status	Fed Status	Common Name	Scientific Name	Habitat
END		Butternut*	*Juglans cinerea*	Mesic Hardwood Forest
END		Canada Forked Chickweed	*Paronychia canadensis*	Upland Prairie, Savanna
END		Carey's Sedge	*Carex careyana*	Mesic Hardwood Forest
END		Christmas Fern*	*Polystichum acrostichoides*	Mesic Hardwood Forest
END		Goldenseal	*Hydrastes canadensis*	Mesic Hardwood Forest
END	THR	Leedy's Roseroot	*Rhodiola integrifolia* ssp. *leedyi*	Cliff
END		Prairie Shooting Star*	*Dodecatheon meadia*	Upland Prairie
END		Wild Quinine*	*Parthenium integrifolium*	Savanna, Upland Prairie
THR		Catchfly Grass*	*Leersia lenticularis*	Floodplain Forest
THR		Clasping Milkweed*	*Asclepias amplexicaulis*	Savanna, Upland Prairie
THR		Clustered Broomrape	*Orobanche fasciculata*	Savanna, Upland Prairie
THR		Davis' Sedge	*Carex davisii*	Floodplain Forest

THR	Edible Valerian*	*Valeriana edulis* var. *ciliata*	Lowland Prairie, Cliff, Upland Prairie, Rock Outcrop, Wet Meadow/Carr, Non-forested Rich Peatland
THR	Glade Mallow*	*Napaea dioica*	Small Rivers and Streams, Floodplain Forest
THR	Great Indian Plantain*	*Arnoglossum reniforme*	Floodplain Forest, Lowland Prairie, Wet Meadow/Carr
THR	James' Sedge*	*Carex jamesii*	Mesic Hardwood Forest
THR	Narrow-leaved Glade Fern	*Homalosorus pycnocarpos*	Mesic Hardwood Forest
THR	One-flowered Broomrape*	*Orobanche uniflora*	Fire Dependent Forest, Savanna, Upland Prairie, Mesic Hardwood Forest
THR	Rock Firmoss	*Huperzia porophila*	Cliff
THR	Rock Sandwort	*Minuartia dawsonensis*	Savanna, Rock Outcrop, Upland Prairie
THR	Silverleaef grape*	*Vitis aestivalis*	Mesic Hardwood Forest
THR	Smooth-sheathed Sedge	*Carex laevivaginata*	Wet Meadow/Carr, Wet Forest
THR	Snowy Campion*	*Silene nivea*	Wet Meadow/Carr, Floodplain Forest
THR	Spreading Sedge*	*Carex laxiculmis* var. *copulate*	
THR	Stemless Tick Trefoil*	*Hylodesmum nudiflorum*	Mesic Hardwood Forest
THR	Sullivant's Milkweed	*Asclepias sullivantii*	Upland Prairie
THR	Tubercled Rein Orchid	*Platanthera flava* var. *herbiola*	Savanna, Wet Meadow/Carr, Lowland Prairie
THR	Tuberous Indian Plantain	*Arnoglossum plantagineum*	Upland Prairie
THR	Witch-hazel	*Hamamelis virginiana*	Mesic Hardwood Forest
SPC	A Species of Firedot Lichen	*Caloplaca stellata*	Cliff, Talus
SPC	Arabian Whitlow Grass*	*Draba arabisans*	Cliff
SPC	Beaked Snakeroot*	*Sanicula trifoliata*	Mesic Hardwood Forest
SPC	Cattail Sedge	*Carex typhina*	Floodplain Forest
SPC	Ebony Spleenwort*	*Asplenium platyneuron*	Mesic Hardwood Forest
SPC	Goldie's Woodfern*	*Dryopteris goldieana*	Mesic Hardwood Forest
SPC	Gray's Sedge	*Carex grayi*	Floodplain Forest
SPC	Green Dragon*	*Arisaema dracontium*	Floodplain Forest, Wet Forest
SPC	Hill's Thistle*	*Cirsium pumilum* var. *hillii*	Upland Prairie, Savanna
SPC	Late Hawthorn	*Crataegus calpodendron*	Mesic Hardwood Forest
SPC	Muskingum Sedge*	*Carex muskingumensis*	Floodplain Forest
SPC	Nodding Wild Onion	*Allium cernuum*	Mesic Hardwood Forest, Cliff, Talus
SPC	Oregon cliff fern	*Woodsia oregana* ssp. *cathcartiana*	Cliff, Talus, Rock Outcrop
SPC	Plains Wild Indigo*	*Baptisia leucophaea*	Savanna, Upland Prairie
SPC	Purple Cliff Brake*	*Pellaea atropurpurea*	Rock Outcrop, Upland Prairie
SPC	Rattlesnake Master*	*Eryngium yuccifolium*	Upland Prairie
SPC	Silvery Spleenwort*	*Deparia acrostichoides*	Mesic Hardwood Forest
SPC	Smooth Rock Cress*	*Borodinia laevigata*	Mesic Hardwood Forest, Cliff, Talus
SPC	Snow Trillium*	*Trillium nivale*	Floodplain Forest, Mesic Hardwood Forest

SPC	Squirrel Corn*	*Dicentra canadensis*	Mesic Hardwood Forest
SPC	Swamp White Oak	*Quercus bicolor*	Floodplain Forest
SPC	White Wild Indigo*	*Baptisia lactea* var. *lactea*	Savanna, Upland Prairie
SPC	Wild Sweetwilliam*	*Phlox maculata*	Lowland Prairie, Wet Meadow/Carr
SPC	Yellow Pimpernel	*Taenidia integerrima*	Savanna, Cliff, Mesic Hardwood Forest, Fire Dependent Forest
SPC	Yellow-fruit Sedge	*Carex annectens*	Lowland Prairie, Upland Prairie, Savanna

Aquatic Species

All the aquatic species listed below are vulnerable to deterioration in water quality, especially increased siltation. As such, it is important that effective erosion prevention and sediment control practices be implemented throughout the duration of the project near the streams listed below and their tributaries.

- Several state-listed mussels, including endangered and threatened mussels, have been documented near the proposed project crosses or may impact the following rivers and creeks. These species are listed below in the rivers where they have been documented near the proposed project and are noted as endangered (END), threatened (THR), or species of special concern (SPC).
    - Zumbro River – flutedshell (*Lasmigona costata*) THR, black sandshell (*Ligumia recta*) SPC
    - Root River – elktoe (*Alasmidonta marginata*) THR, ellipse (*Venustaconcha ellipsiformis*) THR, flutedshell (*Lasmigona costata*) THR, creek heelsplitter (*Platynaias compressa*) SPC
    - Deer Creek – ellipse ellipse (*Venustaconcha ellipsiformis*) THR, creek heelsplitter (*Platynaias compressa*) SPC
    - North and South Forks of Bear Creek – ellipse (*Venustaconcha ellipsiformis*) THR, creek heelsplitter (*Platynaias compressa*) SPC
    - Mississippi River backwaters and main channel – rock pocketbook (*Arcidens confragosus*) END, Rockshell (*Theliderma metanerva*) END, washboard (*Megalonaias nervosa*) END, Higgin's eye (*Lampsilis higginsii*) END, butterfly (*Ellipsaria lineolata*) THR, wartyback (*Pustulosa nodulata*) THR, black sandshell (*Ligumia recta*) SPC, round pigtoe (*Pleurobema sintoxia*) SPC

  If there will be impacts to these rivers and creeks, including crossing with equipment or disturbance to the streambeds, then to demonstrate avoidance, the applicant will need to hire a qualified surveyor to determine if suitable habitat exists within the activity impact area and, if there is, conduct a survey. If state-listed threatened or endangered species are documented during the survey, a permit to take will be needed. **No disturbance to the riverbed (including sedimentation from bank work) may occur until avoidance has been approved or a permit to take has been issued.**

  Surveys must follow the Rare Species Survey Process and the MN Mussel Survey and Relocation Protocol. Alternatively, in situations where a survey is not feasible, the applicant can assume presence of state-protected mussels and apply for a permit to take. Visit Natural Heritage Review for a list of certified surveyors and more information regarding the survey process. Visit Endangered and

Threatened Species Permits for information regarding permits. Please consult with Review.NHIS@state.mn.us if you have questions regarding the survey process or EndangeredSpeciesPermits.dnr@state.mn.us if you have questions regarding the permit to take process.

- There are also state-listed fish that have been documented in rivers and streams near a crossing by the proposed project. These species are listed below in the rivers they have been documented in near the proposed project and are noted as endangered (END), threatened (THR), or species of special concern (SPC).
    - Mississippi River – pallid shiner (*Hybopsis amnis*) END, black buffalo (*Ictiobus niger*) THR, lake sturgeon (*Acipenser fulvescens*) SPC, American eel (*Anguila rostrata*) SPC, pirate perch (*Aphredoderus gibbosus*) SPC, blue sucker (*Cycleptus elongatus*) SPC, Mississippi silvery minnow (*Hybognathus nuchalis*) SPC, and warmouth (*Lepomis gulosus*) SPC. **If the project area contains suitable spawning habitat for pallid shiners or black buffalo, work within the water needs to be avoided from April 1st through July 15.**
    - Zumbro – crystal darter (*Crystallaria asprella*) END, redfin shiner (*Lythurus umbratilis*) SPC, and black redhorse (*Moxostoma duquesnei*) SPC. **To protect spawning crystal darters, work within the water needs to be avoided from March 22nd through June 8.**
    - North Branch Root River – Gravel chub (*Erimystax x-punctatus*) THR. **To protect spawning gravel chubs, work within the water must be avoided from May 1 to June 15.**

  Contact Review.NHIS@state.mn.us if avoiding work in the water in suitable spawning habitat for the species noted above is not feasible, as further action may be needed.

Birds

Several state-listed birds that are associated with wetlands, ponds, and lakes have been documented in close proximity to the proposed projects. These rare birds may be at risk of colliding with or being electrocuted by overhead transmission lines. We recommend the use of bird diverters on overhead lines near lakes and rivers, or other areas that may attract large concentrations of waterfowl.

If avoidance of suitable habitat for state-listed endangered or threatened species during the breeding season is not feasible, areas that will be disturbed that contain suitable nesting habitat will need to be surveyed for active nests prior to any disturbance. Requirements for surveys and lists of DNR certified surveyors can be found at the Natural Heritage Review website.

- Loggerhead shrikes (*Lanius ludovicianus*), a state-listed endangered bird, have been documented in the vicinity of the project site in Olmsted County. Loggerhead shrikes use grasslands that contain short grass and scattered perching sites such as hedgerows, shrubs, or small trees. They can be found in native prairie, pastures, shelterbelts, old fields or orchards, cemeteries, grassy roadsides, and farmyards. Given the potential for this species to be found in the vicinity of the project, **tree and shrub removal is required to be avoided during the breeding season, April 1 through July 31, in Olmsted County.**

  Please contact Review.NHIS@state.mn.us to confirm that the above avoidance measure will be implemented or to inform us that avoidance is not feasible.

- Henslow's sparrow (*Centronyx henslowii*), a state-listed endangered bird species, has been documented in the immediate vicinity of the proposed project in Fillmore County. Suitable nesting habitat for this species includes uncultivated and unmowed grasslands and old fields with standing, dead vegetation, and a substantial litter layer. As such, **disturbance in areas that contain suitable nesting habitat in Fillmore County should not occur during their breeding season, between May 15 and July 15.**

  Please contact Review.NHIS@state.mn.us to confirm that the above avoidance measure will be implemented or to inform us that avoidance is not feasible.

- Red-shouldered hawks (*Buteo lineatus*), a state-listed species of special concern, have been documented during the breeding season in the vicinity of the project. This species requires large, contiguous forest tracts interspersed with wetlands. We recommend, to the extent possible, the retention of forest cover to help maintain habitat connectivity to other forest tracts in the area. **Check any trees in large forest blocks scheduled to be removed from April through June for active nests. If feasible, disturbance within 1000 ft of active nests should be avoided during the critical nesting time, April and May.**

- Lark sparrow (*Chondestes grammacus*), Bell's vireo (*Vireo bellii*), and cerulean warbler (*Setophaga cerulea*), a state-listed bird species of special concern, has been documented in the vicinity of the project. Lark sparrows are found in open, dry grassland areas with scattered trees and shrubs, Bell's vireo prefers shrub thickets within or bordering open habitats such as grasslands or wetlands, and cerulean warblers are found in deciduous forest and constructs its nests on tree limbs. **If feasible, avoid initial disturbance to grassland areas and tree/shrub removal from May 15 through August 15 to avoid disturbance of nesting birds.**

- Peregrine falcons (*Falco peregrinus*), a state-listed species of special concern, have been documented nesting on both sides of the Mississippi River where the proposed project will cross. In the proposed project area, peregrine falcons nest on tall buildings, bridges, and smokestacks and on cliffs along the Mississippi River. Please report any sightings using the DNR Plant and Animal Observation Form.

Reptiles

- Wood turtles (*Glyptemys insculpta*) and Blanding's turtles (*Emydoidea blandingii*), state-listed threatened species, have been documented in the vicinity of the proposed project in Mower, Olmsted, and Wabasha Counties. Both species are semi-aquatic, spending time both on land and in water. Any added fatality can be detrimental to these populations of turtles, as these turtles have a low reproduction rate and depend upon a high survival rate to maintain population levels.

  The proposed project has the potential to impact this rare turtle through direct fatalities and habitat disturbance/destruction. **As such, please contact Review.NHIS@state.mn.us to confirm that the following measures will be implemented in Mower, Olmsted, and Wabasha Counties:**

  - Avoid wetland and aquatic impacts during overwintering season, between September 15 and April 15, if the area is suitable for overwintering.
    - Wetlands and aquatic habitats that freeze solid to the bed (no liquid water) are not suitable overwintering habitat. However, Blanding's turtles will overwinter in wetlands and aquatic habitat where ice has closed over the water's surface.

- Limit erosion and sediment control to wildlife friendly erosion control.
- 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 DNR Plant and Animal 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.

If the above measures are not feasible, please contact Review.NHIS@state.mn.us as a project-specific avoidance plan will likely be needed to demonstrate avoidance.

Additional Blanding's turtle avoidance measures may include, but are not limited to, the following recommendations:

- Recommendations from List 1 of the Blanding's turtle fact sheet. If greater protection for turtles is desired, implement recommendations from List 2.
- Avoid hydro-mulch products that contain any materials with synthetic (plastic) fiber additives, as the fibers can re-suspend and flow into waterbodies.

- Timber rattlesnakes (*Crotalus horridus)*, a state-listed threatened species, and North American racers (*Coluber constrictor*), gophersnake (*Pituophis catenifer*), and western ratsnake (*Pantherophis obsoletus*), all state-listed species of special concern, have been reported in the vicinity of the proposed project and may be encountered on site. In Minnesota, the ideal habitat for timber rattlesnakes is forested bluffs, south-facing rock outcrops, and bluff prairies, particularly in the Mississippi River Valley. Nearby forests, prairies, and agricultural lands are used as summer feeding grounds. Timber rattlesnake mortality in Minnesota is most commonly caused by poaching, vehicle collisions, and habitat destruction. The loss of a single adult, especially a female, can impact the population significantly. **As such the following avoidance measures are required:**

  - Advise crews working in the area that if they encounter any snakes, the snakes must not be disturbed.
  - Limit erosion and sediment control to wildlife friendly erosion control to avoid the inadvertent take of timber rattlesnakes.
  - Report any sightings using the DNR Plant and Animal Observation Form.

  Please contact 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.**

  Additional timber rattlesnake precautions may include, but are not limited to, the following recommendations:

  - Wear appropriate personal protection equipment, such as thick pants, boots, and leather gloves.
  - Care should be taken around stockpiled materials and existing riprap as snakes may use these materials for shelter.

- The area of interest overlaps with a U.S Fish and Wildlife Service (USFWS) Rusty Patched Bumble Bee High Potential Zone. The rusty patched bumble bee *(Bombus affinis)* is federally listed as endangered and is anticipated to be listed as an endangered species in Minnesota in 2026. This species is likely to be present in suitable habitat (shrub/tree cover and the surrounding 100 feet of vegetation) within High Potential Zones and may be impacted by a variety of land management activities including, but not limited to, prescribed fire, tree-removal, haying, grazing, herbicide use, pesticide use, land-clearing, soil disturbance or compaction, or use of non-native bees. 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. **If the project will impact more than two acres of suitable habitat within the high potential zone, avoidance measures or a permit to take may be needed when the endangered status becomes effective.** Updates to the status of this species will be posted at Endangered and Threatened Species Permits.

- 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 nearby, all of Minnesota's bats, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. During the active season (approximately April-November) bats roost underneath bark, in cavities, or in crevices of both live and dead trees. 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 from June 1 through August 15.**

- Please visit the DNR Rare Species Guide for more information on the habitat use of state-listed species and recommended measures to avoid or minimize impacts.

- Please report incidental sightings of state-listed species via the DNR Plant and Animal Observation Form.

Federally Protected Species

- **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.** Please note that all projects, regardless of whether there is a federal nexus, are subject to federal take prohibitions. The IPaC review will determine if prohibited take is likely to occur and, if not, will generate an automated letter.

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.** Resubmit by selecting *Clone Project as Draft* on the project page in MCE.

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 and for your interest in the conservation of Minnesota's rare natural resources.

Sincerely,

James Drake

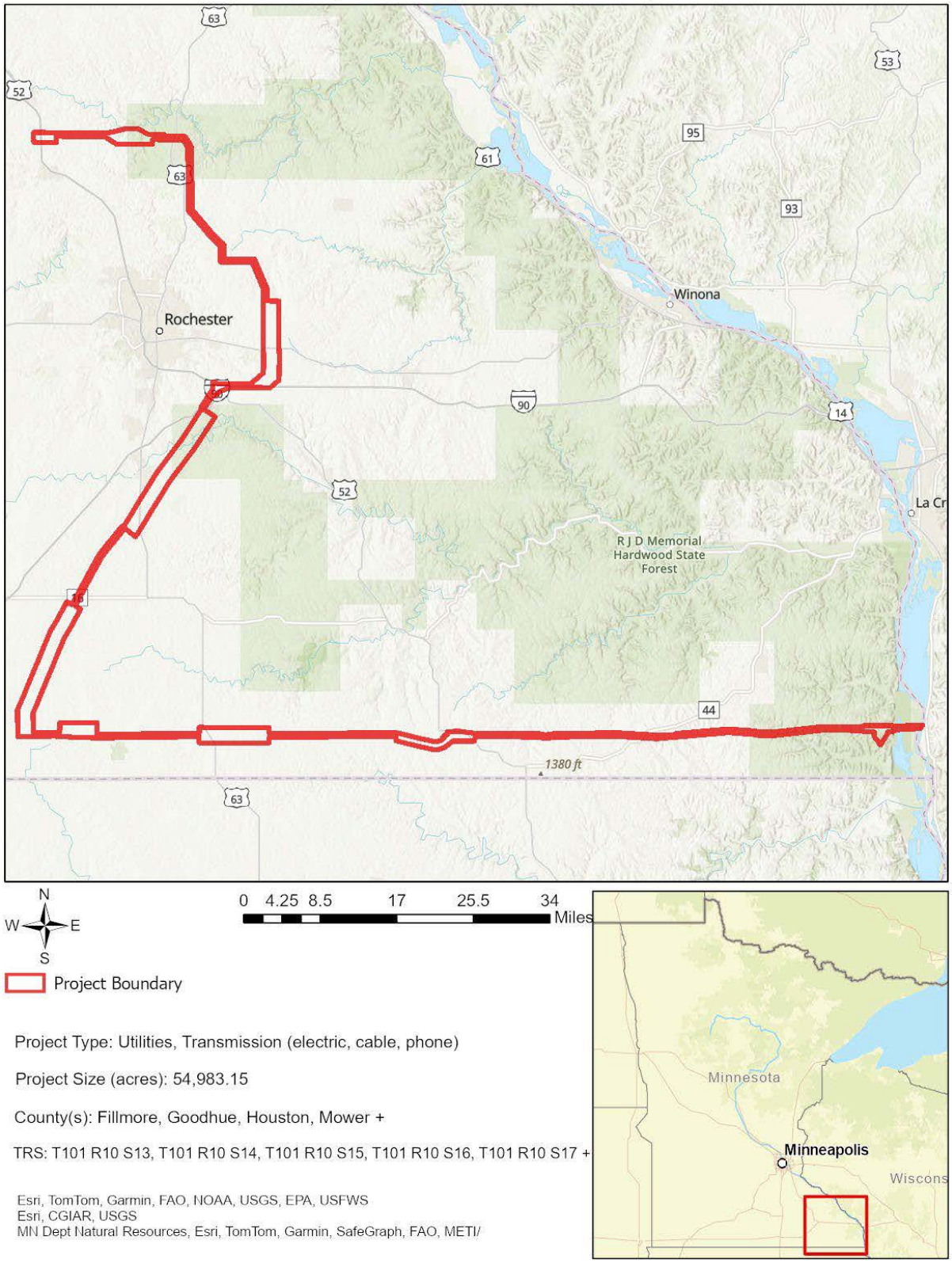
Natural Heritage Review Specialist
james.f.drake@state.mn.us

Cc: Melissa Collins, Amanda Weise, Haley Byron, Megan Benage, Jennie Skancke, Keylor Andrews, Samantha Bump

For more project details, see the MCE-generated Final Project Report, available on the MCE project page.

Gopher to Badger Link Transmission Line Project

USA Topo Basemap With Locator Map



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

Project Size (acres): 54,983.15

County(s): Fillmore, Goodhue, Houston, Mower +

TRS: T101 R10 S13, T101 R10 S14, T101 R10 S15, T101 R10 S16, T101 R10 S17 +

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Esri, CGIAR, USGS
MN Dept Natural Resources, Esri, TomTom, Garmin, SafeGraph, FAO, METI/

Conservation Planning Report: 2026-00499-CPR

This document is intended for planning purposes only for the area of interest defined by the user. The report identifies ecologically significant areas documented within the defined area of interest plus any additional search distance indicated below. These ecologically significant areas can be viewed in the Explore Tab of the Minnesota Conservation Explorer. Please visit MN Geospatial Commons for downloadable GIS data.

This document does not meet the criteria for a Natural Heritage Review. If a Natural Heritage Review is needed, please define an Area of Interest in the Explore Tab and click on the Natural Heritage Review option.

This document does not include known occurrences of state-listed or federally listed species.

MBS Sites of Biodiversity Significance

Search distance = 330 feet

Minnesota Biological Survey (MBS) Sites of Biodiversity Significance are areas with varying levels of native biodiversity that may contain high quality native plant communities, rare plants, rare animals, and/or animal aggregations. A Biodiversity Significance Rank is assigned on the basis of the number of rare species, the quality of the native plant communities, size of the site, and context within the landscape. MBS Sites are ranked Outstanding, High, or Moderate. Areas ranked as Below were found to be disturbed and are retained in the layer as negative data. These areas do not meet the minimum biodiversity threshold for statewide significance but may have conservation value at the local level as habitat for native plants and animals, corridors for animal movements, buffers surrounding higher quality natural areas, or as areas with high potential for restoration of native habitat. The DNR recommends avoidance of MBS Sites of Biodiversity Significance ranked High or Outstanding.

Wetlands within MBS Sites of Outstanding or High Biodiversity Significance may be considered Rare Natural Communities under the Wetland Conservation Act. For technical guidance on Rare Natural Communities, please visit WCA Program Guidance and Information.

For more information please visit MBS Sites of Biodiversity Significance.

The following MBS Sites of Biodiversity Significance are within the search area:

MBS Site Name	Biodiversity Significance	Status
BEAVER CREEK	Outstanding	final
CABBAGE RIDGE NORTH	Moderate	final
CANTON TWP 15	Moderate	final
CHESTER WOODS--EAST	Moderate	final
Clayton 3	Below	final
Clayton 30	Moderate	final
Frankford 6	Below	final
FUGLE'S MILL	High	final
HAYSHORE LAKE	Moderate	final
JEFFERSON 10	Moderate	final
JEFFERSON 21	Moderate	final
Lodi 7	Below	final
Lodi 13 Northeast	Moderate	final
Lodi 13	Below	final
Lodi 14	Below	final

MBS Site Name	Biodiversity Significance	Status
Lodi 24	Outstanding	final
MAYVILLE 36	Moderate	final
MAZEPPA 10	Moderate	final
MAZEPPA 17	Below	final
MAZEPPA 22	Below	final
PICKEREL SLOUGH	High	final
PINE ISLAND 13	Below	final
PLEASANT GROVE 16	High	final
Racine 28	Below	final
Racine Highway 63	Moderate	final
RENO BOTTOMS (RUNNING SLOUGH)	High	final
SIMPSON MADERITIC CLIFFS	Outstanding	final
SPRING GROVE 13	Below	final
TABLE ROCK	High	final
TWIN PEAKS BLUFFS	Moderate	final
VIOLA 28 NE	Below	final
VIOLA 28 SW	Below	final
WINNEBAGO 9	Moderate	final
WINNEBAGO 13	Moderate	final
WINNEBAGO 18	High	final
ZUMBRO 11	Moderate	final
ZUMBRO RIVER-WOODVILLE	Moderate	final

DNR Native Plant Communities

Search distance = 330 feet

A native plant community is a group of native plants that interact with each other and with their environment in ways not greatly altered by modern human activity or by introduced organisms. These groups of native plant species form recognizable units, such as oak savannas, pine forests, or marshes, that tend to repeat over space and time. Native plant communities are classified and described by considering vegetation, hydrology, landforms, soils, and natural disturbance regimes.

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). Native plant communities with a Conservation Status Rank of S1 through S3 are considered rare in the state. The DNR recommends avoidance of rare native plant communities.

Wetland native plant communities with a conservation status rank of S1 through S3 may also be considered Rare Natural Communities under the Wetland Conservation Act. For technical guidance on Rare Natural Communities, please visit WCA Program Guidance and Information.

DNR Native Plant Communities may be given a Condition Rank that reflects the degree of ecological integrity of a specific occurrence of a native plant community. The Condition Rank is based on species composition, vegetation structure, ecological processes and functions, level of human disturbance, presence of exotic species, and other factors. Condition Ranks range from A-rank (excellent ecological integrity) to D-rank (poor ecological integrity. A Condition Rank of NR means Not Ranked and a Condition Rank of MULTI mean multiple ranks are present because the record is a native plant community complex.

For more information please visit Minnesota's Native Plant Communities.

The following DNR Native Plant Communities are within the search area:

MBS Site Name	NPC Code	Native Plant Community Classification	Conservation Status Rank	Number of Communities
CABBAGE RIDGE NORTH	FDs38a	Oak - Shagbark Hickory Woodland	S3	1
CABBAGE RIDGE NORTH	MHs37b	Red Oak - White Oak - (Sugar Maple) Forest	S4	1
CABBAGE RIDGE NORTH	MHs38c	Red Oak - Sugar Maple - Basswood - (Bitternut Hickory) Forest	S3	1
CANTON TWP 15	MHs37b	Red Oak - White Oak - (Sugar Maple) Forest	S4	1
CANTON TWP 15	MHs39b	Sugar Maple - Basswood - Red Oak - (Blue Beech) Forest	S3	1
Clayton 30	UPs23a	Mesic Prairie (Southern)	S2	1
FUGLE'S MILL	FFs59c	Elm - Ash - Basswood Terrace Forest	S2	1
FUGLE'S MILL	MHs38a	White Pine - Oak - Sugar Maple Forest	S3	1
FUGLE'S MILL	MHs39a	Sugar Maple - Basswood - (Bitternut Hickory) Forest	S2	3
HAYSHORE LAKE	FFs68a	Silver Maple - (Virginia Creeper) Floodplain Forest	S3	9
HAYSHORE LAKE	MRn93	Northern Bulrush-Spikerush Marsh	(S2, S3)	3
Lodi 13 Northeast	UPs23a	Mesic Prairie (Southern)	S2	1
Lodi 24	UPs23a	Mesic Prairie (Southern)	S2	1
MAYVILLE 36	MHs37b	Red Oak - White Oak - (Sugar Maple) Forest	S4	2
PICKEREL SLOUGH	FFs59b	Swamp White Oak Terrace Forest	S1	1
PICKEREL SLOUGH	FFs68a	Silver Maple - (Virginia Creeper) Floodplain Forest	S3	3
PICKEREL SLOUGH	MRn93	Northern Bulrush-Spikerush Marsh	(S2, S3)	1
PICKEREL SLOUGH	WMs83a	Seepage Meadow/Carr	S3	1
PLEASANT GROVE 16	FFs59c	Elm - Ash - Basswood Terrace Forest	S2	3
PLEASANT GROVE 16	MHs37	Southern Dry-Mesic Oak Forest	(S3, S4)	2
PLEASANT GROVE 16	MHs38a	White Pine - Oak - Sugar Maple Forest	S3	1
Racine Highway 63	UPs23a	Mesic Prairie (Southern)	S2	1
RENO BOTTOMS (RUNNING SLOUGH)	FFs59b	Swamp White Oak Terrace Forest	S1	1
RENO BOTTOMS (RUNNING SLOUGH)	FFs68a	Silver Maple - (Virginia Creeper) Floodplain Forest	S3	10
RENO BOTTOMS (RUNNING SLOUGH)	MRn93	Northern Bulrush-Spikerush Marsh	(S2, S3)	8
SIMPSON MADERITIC CLIFFS	CTs12	Southern Dry Cliff	(S1, S2, S4)	3
SIMPSON MADERITIC CLIFFS	CTs43a1	Maderate Cliff, Limestone Subtype	S1	2
SIMPSON MADERITIC CLIFFS	FFs59c	Elm - Ash - Basswood Terrace Forest	S2	4
SIMPSON MADERITIC CLIFFS	MHs37	Southern Dry-Mesic Oak Forest	(S3, S4)	2
SIMPSON MADERITIC CLIFFS	MHs37a	Red Oak - White Oak Forest	S3	2
SIMPSON MADERITIC CLIFFS	MHs37b	Red Oak - White Oak - (Sugar Maple) Forest	S4	1
SIMPSON MADERITIC CLIFFS	MHs38a	White Pine - Oak - Sugar Maple Forest	S3	5
SIMPSON MADERITIC CLIFFS	MHs39a	Sugar Maple - Basswood - (Bitternut Hickory) Forest	S2	2
TWIN PEAKS BLUFFS	FDs38a	Oak - Shagbark Hickory Woodland	S3	1
TWIN PEAKS BLUFFS	MHs39b	Sugar Maple - Basswood - Red Oak - (Blue Beech) Forest	S3	2
TWIN PEAKS BLUFFS	UPs13c	Dry Bedrock Bluff Prairie (Southern)	S3	1
WINNEBAGO 9	FDs38a	Oak - Shagbark Hickory Woodland	S3	2
WINNEBAGO 9	UPs13c	Dry Bedrock Bluff Prairie (Southern)	S3	3
WINNEBAGO 13	FDs38a	Oak - Shagbark Hickory Woodland	S3	1
WINNEBAGO 13	UPs13c	Dry Bedrock Bluff Prairie (Southern)	S3	2

MBS Site Name	NPC Code	Native Plant Community Classification	Conservation Status Rank	Number of Communities
WINNEBAGO 18	MHs38c	Red Oak - Sugar Maple - Basswood - (Bitternut Hickory) Forest	S3	1
WINNEBAGO 18	MHs39b	Sugar Maple - Basswood - Red Oak - (Blue Beech) Forest	S3	2
ZUMBRO 11	UPs13c	Dry Bedrock Bluff Prairie (Southern)	S3	2

Calcareous Fens

Search distance = 5 miles

A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota under the Wetland Conservation Act (*Minnesota Statutes*, section 103G.223). 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. For more information regarding calcareous fens, please see the Calcareous Fen Fact Sheet or review the List of Known Calcareous Fens.

The following Calcareous Fens are within the search area:

Fen Site Name	Fen ID	TRS
Chester Fen	9623	101N013W - 24
Dover 7	8257	106N011W - 7
Dover 13	2936	106N012W - 13
Haverhill 19	31983	107N013W - 18; 107N013W - 19
High Forest 15	8275	105N014W - 15
High Forest 35	8276	105N014W - 35
Joyce Park Fen	31964	106N013W - 8; 106N013W - 7
Marion 30	8274	106N013W - 30
Marion 8	31964	106N013W - 8

DNR Old Growth Stands

Search distance = 330 feet

Old-growth forests are natural forests that have developed over a long period of time, generally at least 120 years, without experiencing severe, stand-replacing disturbances such as fires, windstorms, or logging. Old-growth forests are a unique, nearly vanished piece of Minnesota's history and ecology; less than 4% of Minnesota's old-growth forests remain. The DNR recommends avoidance of all DNR Old Growth Stands. The following DNR Old Growth Stands have been documented within the search area.

SEARCH RESULTS: No features were found within the search area.

MN Prairie Conservation Plan

Search distance = 330 feet

The Minnesota Prairie Conservation Plan, a twenty-five year strategy for accelerating prairie conservation in the state, identifies Core Areas, Corridors, and Corridor Complexes as areas to focus conservation efforts. The Plan's strategies include protection, enhancement, and restoration of grassland and wetland habitat. To meet the Plan's goals, approaches within Core Areas will need to include restoration and approaches within Corridors will need to include conservation of grassland habitat which can provide stepping stones between larger Core Areas.

SEARCH RESULTS: No features were found within the search area.

Important Bird Areas

Search distance = 1 mile

Important Bird Areas, identified by the Audubon Society in partnership with the DNR, are part of an international conservation effort aimed at conserving globally important bird habitats. They are voluntary and non-regulatory, but the designation demonstrates the significant ecological value of the area.

The following Important Birds Areas are within the search area:

- Blufflands-Root River
- Upper Mississippi NWR IBA

Lakes of Biological Significance

Search distance = 330 feet

Lakes of Biological Significance are high quality lakes as determined by the aquatic plant, fish, bird, or amphibian communities present within the lake. To be included in this layer, a lake only needs to meet the criteria for one of these four community types. The lake is assigned a biological significance of Outstanding, High, or Moderate based on the community with the highest quality.

The following Lakes of Biological Significance are within the search area:

Public Water Basin Name	Biological Significance	Plant Rank	Fish Rank	Amphibian Rank	Bird Rank
Mississippi River - U.S. Lock & Dam #9 Pool	Outstanding		1		

USFWS Habitat Conservation Plans

A Habitat Conservation Plan (HCP) is a mechanism for compliance with the federal Endangered Species Act for a given set of activities and protected species. An HCP is required by the U.S. Fish and Wildlife Service (USFWS) as part of an application for an incidental take permit (ITP). The ITP allows the permit holder to proceed with activities covered in the HCP that could result in the unintentional take of federally listed species.

Lakes States Forest Management Bat Habitat Conservation Plan (Bat HCP): (search distance = 0; within area of interest only) This HCP was created to provide flexibility to the Minnesota Department of Natural Resources (DNR) to manage forests while addressing federal Endangered Species Act (ESA) regulations related to federally threatened and endangered bat species. The Bat HCP covers three bat species within Minnesota: northern long-eared bat, little brown bat, and tricolored bat. This report is intended to help non-federal, non-DNR landowners evaluate their potential eligibility for the Landowner Enrollment Program of the Bat HCP (For DNR-administered land, DNR staff should refer to the Bat HCP Implementation Policy).

Landowner Enrollment Program – DNR's incidental take permit may be extended through the Landowner Enrollment Program (LEP) to eligible non-federal landowners who conduct forest management activities. Landowners may be eligible to enroll in the LEP if they are a county land administrator, own more than 10,000 acres, or own land that overlaps a Bat HCP feature. The results below indicate if the defined area of interest overlaps a Bat HCP feature. For more information on how to enroll in the LEP, please visit the Landowner Enrollment Program (LEP).

SEARCH RESULTS: No Bat HCP features were found within the area of interest. Landowners are only eligible to apply for the Landowner Enrollment Program if they are a county land administrator or they own more than 10,000 acres.

USFWS Regulatory Layers

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. This report is not a substitution for a Section 7 review.

For informational purposes only, this tool currently checks the following USFWS Regulatory Layers:

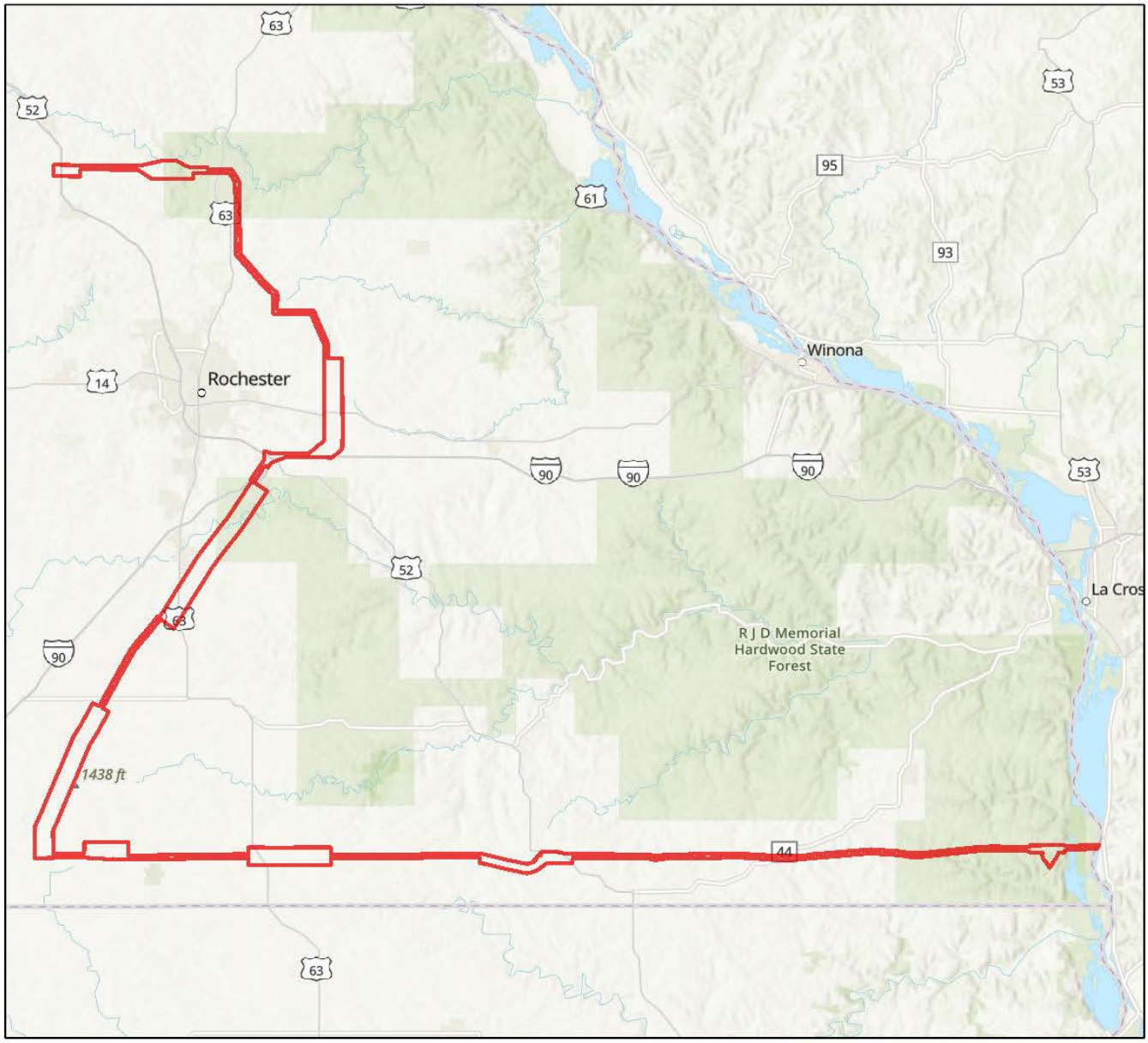
Rusty Patched Bumblebee High Potential Zones: (*search distance = 0; within area of interest only*) The rusty patched bumble bee (*Bombus affinis*), federally listed as endangered, is likely to be present in suitable habitat within the high potential zones. From April through October this species uses underground nests in upland grasslands, shrublands, and forest edges, and forages where nectar and pollen are available. From October through April the species overwinters under tree litter in upland forests and woodlands. The rusty patched bumble bee may be impacted by a variety of land management activities including, but not limited to, prescribed fire, tree-removal, haying, grazing, herbicide use, pesticide use, land-clearing, soil disturbance or compaction, or use of non-native bees. The USFWS RPBB guidance provides guidance on avoiding impacts to rusty patched bumble bee and a key for determining if actions are likely to affect the species; the determination key can be found in the appendix. Please visit the USFWS Rusty Patched Bumble Bee Map for the most current locations of High Potential Zones.

The following USFWS Regulatory Species are within the search area:

- Rusty Patched Bumble Bee High Potential Zone

2026-00499-CPR

Conservation Planning Map



N
W E
S

0 4.25 8.5 17 25.5 34 Miles

Area of Interest



Size (acres): 54,983.10

County(s): Fillmore, Goodhue, Houston, Mower +

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Esri, CGIAR, USGS
MN Dept Natural Resources, Esri, TomTom, Garmin, SafeGraph, FAO, METI/

Gopher to Badger Link Transmission Line Project
Minnesota Department of Natural Resources Monthly Call
October 20, 2026

Attendees

Minnesota Department of Natural Resources (MDNR): Melissa Collins, Samantha Bump, Haley Byron, Jean Coleman

Xcel Energy (Xcel): Ellen Heine, Allison Ray, Tony Wendland

Dairyland Power Cooperative (Dairyland): Mike Peters, Clay DeWitt

Fredrikson & Byron, P.A.: Christina Brusven, Haley Waller Pitts

Merjent, Inc.: Kristin Lenz, Dan Ryan, Jo Render, Hannah Phelps

Collins confirmed MDNR had no specific points for discussion regarding the response letter provided to the MDNR on September 25, 2026. Lenz noted MDNR's letter of August 31, 2026 discussed the potential for development of an alternative alignment to avoid Shooting Star Prairie Scientific and Natural Area (SNA). Lenz inquired if the MDNR had had the opportunity to further review the shapefiles of the Proposed Route, Proposed Right-of-Way and Proposed Alignment and had a proposed alternative alignment in this area. Collins indicated that MDNR would look to the Applicants to provide potential route alternatives for MDNR consideration because the Applicants have a better understanding of what needs to be considered during routing from an engineering and constructability perspective.

Collins noted MDNR's letter requested an opportunity to hear more about the routing process that Xcel and Dairyland (the Applicants) used to evaluate the Proposed Route and route alternatives. Collins requested additional information on what criteria were considered when developing the Proposed Route. Brusven explained a wide range of criteria were evaluated, which are described in the Route Permit Application. The criteria included, but were not limited to:

- Ability to co-locate with existing utility or transportation corridors;
- Proximity to residences, farms, airports, and other facilities;
- Crossing of federal- and state-managed lands;
- Proximity to ecologically significant areas; and
- Engineering feasibility and safety.

Collins noted that much of the existing 161 kilovolt (kV) transmission corridor that the Project follows was developed at a time when there was less environmental regulation and less knowledge of resources. The concern was for areas within the existing 161 kV corridor where clear cutting for a wider route may extirpate rare plant communities or endangered species. DeWitt clarified there is no plan to clear cut within an SNA.

Shooting Star Prairie SNA

Lenz shared a map of the Shooting Star Prairie SNA and the surrounding area, including nearby residences, the Iowa River (MDNR public water), Lake Louise State Park, Shooting Star Trail and other conservation easements managed by the Minnesota Board of Soil and Water (BWSR). Brusven indicated that this area is a pinch point due to the number of resources in the area and that the Applicants had proposed the Proposed Alignment along the existing 161 kV transmission line because it best balances impacts to environmental and other human features at this location. Lenz also highlighted that the 0.03 acres of the Proposed Right-of-Way overlapping the Shooting Star Prairie SNA would occur in an area that is already cleared, as it appears to occur within road

right-of-way. Collins indicated that, based on MDNR's current understanding of the Project, they would be very unlikely to issue a License to Cross the SNA because operations and maintenance of the transmission line right-of-way would degrade the SNA. Collins also indicated that the SNA is part of a larger block of habitat that also includes the BWSR easement to the east. Byron noted the possibility of deed restrictions on the SNA. Lenz reported that the Applicants had met with BWSR regarding the proposed crossings and that BWSR had not indicated that the proposed Project was not permittable; Dairyland has existing easements through these areas that would need to be expanded or renewed.

Lenz inquired if the MDNR had any feedback on priorities or preferred routing through this area. Lenz acknowledged, for example, that the MDNR had previously indicated that they do not want the route to go further to the south closer to Lake Louise State Park. Peters stated Dairyland has been in discussions with the adjacent landowner just north of the Proposed Alignment, who has expressed they are not interested in relocation. Lenz noted the Proposed Alignment crosses the Shooting Star State Trail in three areas: two of those crossings are near the existing Adams Substation where there are existing transmission lines already crossing the trail. The other crossing is just to the east of the Shooting Star Prairie SNA. Collins raised a possible route alternative alignment north of County Road 140 along field section lines along the northern edge of the Proposed Route to avoid the Shooting Star Prairie SNA. Collins stated it may be acceptable to the MDNR to be within 0.25 mile of the Cartney Slough Wildlife Management Area that is located north of the Proposed Route. The Applicants indicated that they would take this back and discuss how to incorporate into the Route Permit Application, but it would likely be introduced as an Alternative Alignment that the Applicants would request that the Minnesota Public Utilities Commission (MPUC or Commission) further evaluate during scoping and in the Environmental Impact Statement.

Overview of Route Alternative Process Conducted by the Applicants

Lenz led an overview of the route alternatives considered in the development of the Proposed Route. Lenz reminded the MDNR that the Applicants provided a shapefile of the route alternatives considered to the MDNR with the September 25, 2026 response letter. The Applicants started the route alternatives process by establishing a Route Study Area. The Applicants reviewed an area extending from the North Rochester Substation area northeast to Kellogg, Minnesota and the Minnesota/Wisconsin state line along the Mississippi River, and south to the Minnesota/Iowa border and east. Lenz explained that the 765 kV transmission line would continue into Wisconsin to the Bell Center area. Lenz shared a map of the Routing Study Area that showed existing utility and transportation corridors, and a map showing rare and unique natural resources, including MDNR Sites of Biodiversity Significance (SBS), Native Plant Communities (NPCs) and Potential Rare Natural Communities (RNCs). This map highlighted that the Proposed Route avoids the largest concentration of ecologically sensitive areas that occur along the Mississippi River in Wabasha, Winona and Houston counties, and stretches west into Fillmore County along river valleys and hillslopes.

The Mississippi River crossing is the biggest constraint on the eastern end of Segment 2. The U.S. Fish and Wildlife Service's (USFWS') Upper Mississippi National Fish and Wildlife Refuge (NWFR) runs along the Mississippi River from Iowa north past Red Wing, Minnesota. Other constraints in this area include the river's status as a Section 10 navigable water, which has associated clearance restrictions established by the U.S. Army Corps of Engineers (USACE) and U.S. Coast Guard (USCG). There are also a few airports along the river that also have clearance restrictions, but in contrast to the USACE and USCG restrictions, the airports generally require shorter structures in the interest of aviation safety. The steep terrain along the river also poses challenges, and there are several notable population centers, including Winona, La Crescent, and

La Crosse. The Applicants have been coordinating with the USFWS regarding the NWFR crossing since 2024. The Proposed Right-of-Way at the river crossing would use Dairyland's existing 200-foot-wide right-of-way that currently hosts two 161 kV transmission lines. The Applicants would not need to widen the right-of-way at this crossing; one of the 161 kV transmission lines would be retired and removed, and the other 161 kV line would then be installed on the same structures as the new 765 kV line. Currently there are 28 wooden H-frame and two lattice structures along the right-of-way within the NWFR; the Project would reduce the number of structures to 8 lattice structures.

The Applicants also considered three route alternatives following Interstate 90 (I-90). The Segment 1 portion of the Proposed Route would remain largely the same until I-90. Route Alternative A would largely follow I-90 and cross the Mississippi River into the La Crosse, Wisconsin area. The density of residences near I-90 increases as I-90 moves east to the Mississippi River. Further, the La Crosse Regional Airport is approximately 0.5 mile from I-90, which would likely require shorter structures. However, shorter structures could conflict with USACE clearance requirements for the Mississippi River crossing. Finally, the Applicants understand from MnDOT that MnDOT has scenic easement rights along this portion of I-90, particularly from Nodine towards Dakota and the Mississippi River Valley. Route Alternatives B and C partially follow I-90, but then turn south to follow existing Dairyland 69 kV transmission lines – one near Ridgeway and the other near Fremont, Minnesota. The Applicants provide a comparison of impacts to environmental and human features for the Proposed Route and Route Alternatives A, B and C in the Route Permit Application. These Route Alternatives were ultimately rejected by the Applicants because the Proposed Route offers a favorable balance between human and environmental considerations by emphasizing co-location with existing infrastructure, and reducing potential effects on nearby residences and key natural resources, among other engineering challenges.

Heine provided an overview of the West of Rochester and the CapX Route Alternatives. Comments received during public outreach suggested routing the Project south from the North Rochester Substation on the west side of Rochester to the Adams Substation before turning east. The Applicants evaluated whether a reasonable and prudent route alternative could be developed west of Rochester paralleling existing transmission lines. There are several existing and planned high voltage transmission lines approximately 5 miles to the west of Rochester between the North Rochester Substation and the Pleasant Valley Substation, which is approximately 17 miles north of the Adams Substation. Currently, there is a single-circuit 345 kV line between the North Rochester and Pleasant Valley substations, and a 161 kV line which runs between the Pleasant Valley Substation and Byron Substation. In addition, the Tranche 2.1 Portfolio includes a new 765 kV Lakefield – Pleasant Valley – North Rochester 765 kV line (LRTP 24) and a new 345 kV Pleasant Valley – North Rochester – Hampton 345 kV line (LRTP25) to be double-circuited with the existing 345 kV line in that right-of-way. These two new transmission lines are being developed as part of PowerOn Midwest. If the Project were also routed west of Rochester, the area between Pleasant Valley and North Rochester would contain two separate 765 kV transmission lines, a double-circuit 345 kV transmission line, and, over a portion of its length, an existing 161 kV transmission line. The Applicants determined that such a concentration of backbone transmission facilities is not prudent from a system reliability perspective.

Heine also noted that the Applicants evaluated a route alternative that would parallel the existing CapX 345 kV line from the North Rochester Substation and into Wisconsin near Alma, Wisconsin, and also evaluated options to parallel portions of the CapX line but continue south to the Dairyland 161 kV line near Marion. These options were problematic due to the close proximity to the City of Oronoco and significant rural residential development, infrastructure congestion at the crossing of the Zumbro River at White Bridge Road, and the Mankato to Mississippi River Transmission

(MMRT) project. The MMRT project was recently approved by the Commission and includes constructing a new 161 kV line generally in parallel with the existing double-circuit 345 kV CapX structures. Lenz also added that Dairyland is building a new 345 kV line starting in Alma, Wisconsin on the east side of the Mississippi River starting in Q4 2026, and that transmission line corridor is also congested. The USACE has also purchased property on the west side of the river in Minnesota and is undertaking native prairie restoration in this area.

MDNR Route Segment Alternative Suggestion – Houston County

Collins suggested looking at potential route segment alternative generally following County Road 14 in Houston County from around State Highway 76 to the area proposed for the new Jefferson Ridge Switchyard to avoid further expansion of the existing transmission line corridor in NPCs, SBS and RNCs, and impacting state-listed species found within these habitats. Collins noted the Proposed Right-of-Way would create 170 feet of additional clearing and significantly affect rare communities that should be avoided, providing examples of wetlands on the slopes of bluffs and intact high-quality forested plant communities supporting rare species. MDNR staff have been in the area recently conducting surveys and documenting an extensive list of species. Collins noted this is one of the most sensitive areas along the Proposed Route. The MDNR indicated that seeking a Take Permit after a Route Permit is issued would result in an extensive effort to avoid, mitigate, or compensate for affected resources; potentially requiring up to a year to issue a Take Permit.

DeWitt noted that by following the existing transmission line right-of-way, the Proposed Right-of-Way would use an area that has already been partially cleared of woody vegetation. DeWitt also noted the need for the existing 161 kV transmission line to tie into existing substations, which could be a challenge for this proposed route alternative. The Applicants are making every effort to stay within already impacted areas. Lenz noted the practice to conduct flora surveys to identify species after the route is designated by the MPUC; micro-siting would provide opportunities to avoid identified sensitive species. Collins stated the MDNR is interested in preserving plant communities as well as individual plants. Brusven inquired on whether the lack of SBS and NPCs along County Road 14 may be a result of lack of survey data. Collins indicated that the area along County Road 14 is located on a plateau area that is already affected by residential development and agricultural land use and has fewer intact plant communities. She acknowledged there would still be tree clearing needed along the route alternative, but large intact plant communities along the Proposed Route would not be affected. Collins indicated that the large block habitats the MDNR is interested in preserving extend beyond the mapped boundaries of the SBS and NPCs and include the intact forested tendrils that are adjacent and connected to these communities that should be protected.

The Applicants indicated that they would also take this suggested route alternative back for review and discuss either incorporating into the Route Permit Application or identified for potential evaluation by the MPUC during the scoping process.

Natural Heritage Review

In its October 2, 2026 Natural Heritage Review, MDNR stated "*All known occurrences of state-listed endangered and threatened plant species and all their potential habitats must be avoided. Given that the right-of-way is regularly maintained, spanning is not considered avoidance.*" Lenz observed this language is notably different than in past reviews, and inquired on what MDNR meant by indicating that "*and all their potential habitats*" must be avoided. Collins noted the MDNR's concern to protect intact habitat that supports these species, with recent examples identified by agency staff in forests near the Project area. The act of tree clearing and the creation of a fringe forested area would be challenging to maintain these rare species. Brusven noted the

Proposed Right-of-Way would not create a new clear cut in the area but rather would expand the existing corridor.

Lenz requested clarification on whether the MDNR was indicating they would not issue a Take Permit if surveys identified individuals within the Proposed Right-of-Way and how the MDNR would establish “potential habitat”. Collins noted that issuing a Take Permit must consider whether take of individuals would jeopardize the species population within the state. The MDNR cannot issue a Take Permit if the Project would result in the extirpation of a population. Lenz noted this would be a similar approach to the federal biological assessment process. With regard to potential habitat, Collins pointed back to the Natural Heritage Review letter from the MDNR that identifies habitat types where certain species occur. Lenz confirmed that the MDNR’s intent then would be to identify “potential habitat” associated with individuals identified during survey. Lenz also suggested that there may be other conservation measures that the Applicants could commit to that would allow for spanning and protect species, such as prohibiting the use of herbicides in these areas. Byron said there were examples in which other utilities had made commitments to specific measures, such as prohibiting the use of herbicides, but these commitments were not upheld during operations. That is the rationale behind the MDNR including the statement that “spanning is not considered avoidance.” Brusven asked whether the MDNR has submitted such concerns to the Commission that would be available for review. Byron was uncertain and indicated that that issue had not come up in the last four years that she was aware of in her region.

Minnesota Department of Transportation

From: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>
Sent: Tuesday, May 5, 2026 2:37 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>; Michael Peters <Michael.Peters@DairylandPower.com>
Cc: Gregor, Nathan (DOT) <nathan.gregor@state.mn.us>; Kristin Lenz <kristin.lenz@merjent.com>; Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>; Brown, Beth A (DOT) <elizabeth.a.brown@state.mn.us>; Schoenfelder, Mark (DOT) <mark.schoenfelder@state.mn.us>
Subject: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options

CAUTION: This email originated from outside of Merjent.

Thanks Stacy,

That would be really helpful. We are in our second round of open houses this week, so will soon be narrowing down to what our expected proposed route will be. We will loop a few more folks in and look to identify some dates/times that would work for us to connect with your team to get this scheduled.

Ellen

Ellen Heine
Xcel Energy
P: 612.330.6073 **C:** 651-247-0957
E: ellen.l.heine@xcelenergy.com

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Tuesday, May 5, 2026 11:40 AM

To: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>; Michael Peters <Michael.Peters@DairylandPower.com>
Cc: Gregor, Nathan (DOT) <nathan.gregor@state.mn.us>; Kristin Lenz <kristin.lenz@merjent.com>; Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>; Brown, Beth A (DOT) <elizabeth.a.brown@state.mn.us>; Schoenfelder, Mark (DOT) <mark.schoenfelder@state.mn.us>
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EXTERNAL - STOP & THINK before opening links and attachments.

Good Morning, Ellen and Michael,

Thank you for initiating early coordination with MnDOT regarding the Gopher to Badger Link Project.

Per our usual protocol, and when certain specifics are available, MnDOT welcomes you to host a project introduction meeting with applicable agency staff. When the Project team is ready, please share a few availability options and I will work to make a Microsoft Teams meeting happen on my end.

Anticipated meeting topics would be:

1. Scope of work
2. Project timeline
3. Other state/federal agency coordination to-date
4. Anticipated effects on the state trunk highway system
5. Cursory review impact/mitigation results from MnDOT *(shapefiles of the current routes/route options shown in the emailed attachment are requested as soon as possible)*
6. Discussion around TH collocation opportunities and/or limitations
7. An overview of MnDOT's early coordination expectations (Utility Early Notification Memo process) – by MnDOT staff

MnDOT District 6 CHIP

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@Brown, Beth A (DOT) and **@Schoenfelder, Mark (DOT)** – I will be inviting @Hartzheim, Paul (DOT), @Condon, Terry (He/Him/His) (DOT), @Evans, David (DOT), @Smith, Russell M (DOT), and @Wayne, Kurt (He/Him/His) (DOT) to this meeting. If you'd like to join, please let me know. Otherwise, these are the typical attendees at relevant "Project Introduction Meetings" MnDOT engages in for PUC project planning.

Stacy Kotch Egstad

Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
651-358-0786

DEPARTMENT OF TRANSPORTATION

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, May 1, 2026 5:02 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Brown, Beth A (DOT) <elizabeth.a.brown@state.mn.us>; Gregor, Nathan (DOT) <nathan.gregor@state.mn.us>; Schoenfelder, Mark (DOT) <mark.schoenfelder@state.mn.us>; Schoenfelder, Mark (DOT) <mark.schoenfelder@state.mn.us>
Subject: Gopher to Badger Link Project Introduction - Route Options

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Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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From: Dan Ryan
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: Gopher to Badger Link Project Introduction - Route Options - MnDOT Meeting
Date:
Attachments:

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Monday, June 8, 2026 2:17 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Gregor, Nathan (DOT) <nathan.gregor@state.mn.us>; Hogan, Karissa (She/Her/Hers) (DOT) <Karissa.Hogan@state.mn.us>; Brown, Beth A (DOT) <elizabeth.a.brown@state.mn.us>; Schoenfelder, Mark (DOT) <mark.schoenfelder@state.mn.us>; Gregory, Shawn <Shawn.Gregory@nexteraenergy.com>; Jacob LaDuke <Jacob.LaDuke@DairylandPower.com>; Tremayne, Aaron <Aaron.Tremayne@nexteraenergy.com>; Dan Ryan <dan.ryan@merjent.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Michael Peters <Michael.Peters@DairylandPower.com>; Naomi Christenson <naomi.christenson@merjent.com>; Amanda Johnson <amanda.johnson@merjent.com>; Gallay, Benjamin J <Benjamin.J.Gallay@xcelenergy.com>
Subject: Gopher to Badger Link Project Introduction - Route Options - MnDOT Meeting

Good afternoon Stacy,

Attached please find the .kmz for the current Gopher to Badger Link Project proposed alignment, which consists of Segment 1 (Xcel segment) and Segment 2 (Dairyland/GridLiance segment). We have also received comments from the public to explore a route alternative along I-90, which we would also like to discuss with you.

With the larger group, I've put together a meeting poll to figure out which date/time would work best for all invitees. There are some potential dates for this week, so I'd like to ask folks to fill out the poll by **EOD tomorrow, June 9** please, and I'll get the meeting invite sent out tomorrow for the best date/time.

Scheduling poll

RE: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options

1 hour duration

23 time options

Vote | View all your polls

We assume we'll want to meet a couple more times, so hoping we can look at calendars during the first meeting to set up some future dates!

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
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kristin.lenz@merjent.com

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Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
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On behalf of Dairyland and Xcel Energy,

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From: Kotch Egstad, Stacy (DOT)
To: Kristin Lenz
Subject: RE: Gopher to Badger Link Project Introduction - Route Options - MnDOT Meeting
Date: Tuesday, June 16, 2026 6:11:35 PM
Attachments:

Kristin,

As requested, last revision/completely blank ENM and Checklist (to be returned as well, FYI). Even portions I typically pre-fill before delivery have been left blank to use as your own template now and later for other projects, if needed.

Please let me know if you have questions on the documents.

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
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Subject: Gopher to Badger Link Project Introduction - Route Options - MnDOT Meeting

Some people who received this message don't often get email from kristin.lenz@merjent.com. Learn why this is important

Minnesota Department of Transportation

Early Notification Memo (Utility Projects) THIS PAGE FOR MNDOT USE ONLY

IMPORTANT NOTE: Please focus your review on areas where the proposed utility directly crosses, is collocated with, or is adjacent to MnDOT trunk highways.[1] You are not responsible to review project areas that are outside of MnDOT ROW.

District(s):

County(ies):

Trunk Highways Impacted:

Date: Click here to enter a date.
Subject: Request for Utility Project Review
Project Name:
Project Proponent:

Job Number (completed by MnDOT): **SRC (completed by MnDOT):**
Anticipated MNPUC Filing Date (if known):
MNPUC Docket No:
Construction Start Date (if known):
In-Service Date (if known):

Please reply by (completed by MnDOT): Click here to enter a date.
If this date is not possible, please reply and provide an estimate of when this review can be completed.

This ENM report was prepared by:

Office of Land Management (OLM) - Stacy Kotch Egstad
MnDOT Central Office
Email: Stacy.Kotch@state.mn.us
Phone: 651-366-4635 (Office only Tue & Thur)

A Teams channel has been created to assist in your review. The folder has copies of XXX. Please see the "MNDOT_Utility ENM Project Review Instructions" document in Teams Channel for more information on how to complete responses to this ENM.

<<Insert link to Teams Channel>>

For additional information about the project, please contact the ENM Report writer (Stacy Kotch Egstad, stacy.kotch@state.mn.us) and/or the OES Utility Review Coordinator (Paul Hartzheim, paul.hartzheim@state.mn.us).

[1] Note: review of designated scenic byways may involve roadways that are not state Trunk Highways.

APPLICANTS: PLEASE RETURN A COMPLETED COPY OF THIS FORM, APPLICANT CHECKLIST, AND SUPPLEMENTAL INFORMATION TO THE MnDOT OFFICE OF LAND MANAGEMENT (OLM) MANAGER / EARLY NOTIFICATION MEMO (ENM) REPORT WRITER

Utility Applicants:
Click the checkboxes in left column if your project meets thresholds (click heading link for thresholds). By default, MnDOT's Design Support, Safety and Operations Management, Blowing Snow Control Cultural Resources Unit, Environmental Assessment Unit, Traffic Management Systems, and District staff will be notified of all Utility ENMs.

	Contact(s) for Area of Concern
☐	Protected Species Program (Environmental Assessment Unit)
☐	Contaminated Materials Management
☐	Regulated Waste and Storage Tanks
☐	Vegetation Review and Survey
☐	Wetlands Coordination
☐	Water Permits—Federal Agencies, Floodplains
☐	Historic Roadside Properties Program
☐	Construction Stormwater and Erosion/Sediment Control
☐	Safety Rest Area Program
☐	Scenic Byways
☐	Railroad
☐	Airport Influence Area aviationplanning.dot@state.mn.us
☐	Office of Statewide Radio Communications (wind projects only)
X	Design Support
X	Safety and Operations Management
X	Blowing Snow Control
X	Cultural Resources
X	OES Environmental Assessment Unit (All ENMs)
X	Traffic Management Systems (Metro and Greater MN)
X	District Permitting and Planning Staff

Request for information and early coordination from MnDOT functional groups

The OLM is providing early notification of the proposed utility project described in the subject line of this ENM and is requesting your review of the project. Project information available at this time may be limited, therefore, we recognize that responses are preliminary and may change after reviewing other documents and/or if project details change. However, your early input will help assure that all environmental concerns and interests considered in the development of this project.

Project Description

Utility applicants/ENM Writer: Provide a plain language narrative description of the utility project location and the nature of the proposed work. Include the following project information below, if known:

- Type of utility
  - High voltage transmission lines
    - pole height, spacing, voltage
  - Pipeline
    - type (e.g., oil, natural gas, CO_2, etc.)
    - pipe diameter and material
  - Wind farms
  - Solar farms
  - Power plants
  - Energy storage systems
- Mileage (total and colocated)
- Typical temporary workspace dimensions and depth of excavations
- Typical permanent easement dimensions – easements do not apply *within* MnDOT TH ROW
- Number and locations of trunk highways crossed and/or miles of proposed colocation
- Scenic Byways within 7 miles of the project
- General project schedule
- Powerlines – is there a potential to locate poles/infrastructure within MnDOT ROW?
  - Poles: planned distance from TH ROW line?
  - Davit arms: planned overhang (in feet)?
  - Aerial/blowout: max CME?
- Pipelines/buried utilities – method of installation within MnDOT ROW (e.g., bore, HDD, typical open cut trench, etc.)
- Access – locate and describe temporary or permanent access request(s) off TH ROW

Provide shapefiles, corresponding maps/datasets, and all other information identified in the enclosed *Utility ENM – Supplemental Information Checklist* form. Please return this completed checklist along with this Utility ENM form. Note that you may need to provide some of the supplemental information in a stand-alone document.

General Project Information:

District(s):	
County(ies):	City(ies):
Planned Construction Dates:	
Location and Reference Points: Refer to enclosed maps/shapefiles for location of MnDOT Trunk Highway crossings.	
Project Phase: ☐ Pre-Filing ☐ Post-Filing ☐ MnDOT Permitting Phase ☐ Post-Construction Monitoring and Maintenance Additional Comments (Docket number, public comment/notice number/date, etc.): _____	
Tribal Lands: Is any part of project within a reservation or tribal trust land outside of reservation boundaries? ☐ Yes ☐ No If yes, list name of reservation: _____ Has the tribe(s) been made aware of the proposed project? ☐ Yes ☐ No ☐ Unknown	

Current Land Use(s): **(Attention: See Detailed Maps or Supplemental PDF)**	
Recreational Resources:	
☐	There are parks, trails, wildlife refuges, state water trails, and/or recreation areas in the project vicinity.
	If checked above, will this project have impacts on these parks, trails, refuges, and/or recreation area? ☐ Yes ☐ No ☐ Unknown If yes, provide additional details: _____
Community Impacts and Demographics	
☐	There are manufactured home parks, apartment buildings, or other identifiable minority or low-income populations in the project vicinity.
	If checked above, will this Project have any impacts [direct or indirect (e.g., noise)] on any manufactured home parks, apartment buildings, and/or other identifiable minority or low-income populations? ☐ Yes ☐ No ☐ Unknown
	If checked, please describe what measures are proposed to mitigate impacts to environmental justice communities: _____

Additional information, by subject area

Protected Species Program Review -- All Actions – Send ENM to OES wildlife ecologist.	
☐	The Project may involve work that occurs within 300 feet of an existing road (e.g., MnDOT Trunk Highway) surface.
☐	The Project bisects or borders federally-designed critical habitat for threatened and/or endangered species
☐	The project's route passes over or under a bridge with evidence of bats (see Bridge Inspection Report(s)) – Element #900, CS 4 = 1); (**projects meeting this criterion may require bat surveys**)
☐	The Project may use temporary lighting and/or install or replace permanent lighting.
☐	The Project will involve tree clearing on or near MnDOT ROW. ☐ Yes ☐ No ☐ Unknown For tree clearing timing requirements, please see Technical Memorandum No. 24-02-ENV-01 dated January 30, 2024.[2]
☐	The Project may clear trees more than 100 feet from the from the roadway surface at any time, including winter clearing.
Other pertinent information regarding protected species (e.g., summary of agency consultations with USFWS/DNR, summary of field surveys, etc.): _____	

Contaminated Material	
☐	Project includes grading, excavation within MnDOT ROW. Details: _____
☐	Project includes access and/or travel across MnDOT ROW Details: _____
☐	Project is in or near a commercial/industrial area.
☐	Project may require groundwater dewatering. Details: _____
☐	Applicant has information that indicates potentially contaminated sites are located along the corridor (e.g., filling stations, dumps, manufacturing, scrap yards, dry cleaners, etc.)
Other pertinent information regarding contaminated material: _____	

Regulated Waste and Storage Tanks	
☐	Project will include building demolition or relocation.
☐	Project will include acquisition of property with above ground discarded regulated materials or waste.
☐	Project will produce waste that cannot be turned over to construction contractor as excess material (examples: hazardous waste, sandblasting waste, asbestos containing material)
Other pertinent information regarding regulated waste and storage tanks: _____	

Blowing Snow Control (to be identified by MnDOT staff)
Known blowing snow problem areas and existing snow mitigation infrastructure in the vicinity of the Project location will be identified by MnDOT staff during their review of this ENM. Specific comments and recommendations will be provided, as necessary.

[2] Technical Memo is only available to MnDOT staff.

Vegetation (Map[3] vegetation of interest along roadsides)	
☐	Project may occur along Trunk Highways listed in the Vegetation TPDP (specific locations below): • Highway 2 (Reference post 35-37 and 42-48) • Highway 32 (Reference post 35-37, 49-52, 55-58, and 70-74) • Highway 71 (Reference post 81-83) • Highway 56 (Reference post 8-16) • Highway 102 (Reference post 2-6) • Highway 218 (Reference post 20-44)
☐	Project may cause soil disturbance beyond inslope
☐	Project may include soil disturbance under canopy of existing woody vegetation
☐	Project is located within an area of known sensitive or protected vegetation identified through the Minnesota Conservation Explorer Planning Tool (within one or more of the following data sets): • Minnesota DNR Native Plant Community • Minnesota Biological Survey (MBS) Railroad Rights-of-Way Prairies • MBS Site of Biodiversity Significance
☐	Project is located within an area of known high priority weed infestation (data available through EDDMapS.org)
☐	Project may require staging or access within MnDOT right-of-way
Other pertinent information regarding vegetation: _____	

Wetlands and Waterbodies	
☐	A level 1 wetland/aquatic resource delineation (i.e., mapping exercise using NWI, aerial photography and other off-site methods) has been conducted within the project limits.
	☐ Based on the level 1 wetland delineation, there are wetlands within the project limits. Details: _____
	Does the project have the potential to temporarily impact wetlands? ☐ Yes ☐ No ☐ Unknown Does the project have the potential to permanently impact wetlands (e.g, fill or type conversion)? ☐ Yes ☐ No ☐ Unknown Details: _____
Other pertinent information regarding wetlands and waterbodies: _____	

Floodplains	
☐	The project may impact 100-year floodplains. (FEMA Maps) Details: _____
	☐ If yes, will the project do any work below or adjacent to the 100-year floodplain elevation? ☐ If yes, will any aboveground structures or impervious surfaces be located within the floodplain?
Other pertinent information regarding floodplains: _____ _____	

Wetland and Waterbody Permits—Federal Agencies	
☐	US Army Corps of Engineers Section 404 permit may be needed. If checked, the project may qualify for: ☐ Regional General Permit ☐ Individual Permit ☐ Unknown

[3] Google Earth shapefile; only available to MnDOT staff.

☐	US Army Corps of Engineers Section 10 (navigable waters) permit may be needed.
☐	US Coast Guard coordination and/or permit may be needed (navigable waters).
Other pertinent information regarding wetland and waterbody permitting: _____	

Cultural Resources (Historic Properties and Tribal Consultation) Review
Provide narrative summary of relevant information regarding cultural resources, surveys, and agency consultation completed to date. (*e.g., summary of archaeology, architecture/history surveys to date, status of consultation with the State Historic Preservation Office (SHPO), Minnesota Indian Affairs Council (MIAC), Office of the State Archaeologist (OSA), Tribal partners, etc.)*: _____

State Entry Signs/Monuments	
☐	Project may impact an existing Minnesota state entry monument (locations and sign types[4])
☐	Project is located on the National Highway System (NHS) within three miles of the state border.
Other pertinent information regarding state entry signs/monuments: _____	

Historic Roadside Properties Program	
☐	Project is near or adjacent to known historic roadside properties on MnDOT right of way. Known properties are listed by District, Trunk Highway, Reference Point and Historic Name (of property) in the Historic Roadside Properties on Minnesota Trunk Highways.[5]
☐	Project is near or adjacent to structures/elements in the MnDOT right of way older than fifty years but is not included on list above. Structures/elements include historic walls, historic markers, objects, overlooks, buildings, etc.
Other pertinent information regarding Historic Roadside Properties Program: _____	

Construction Stormwater and Erosion/Sediment Control	
☐	Will the Project disturb greater than 1 acre of land and require coverage under MCPA General Permit MNR100001?
☐	Will the Project disturb (excavation, grading, stockpiling, equipment traffic, compaction) at least 5 acres of MnDOT ROW?
☐	Will the Project result in discharges to special or impaired waters (refer to MNR100001 for examples)?
☐	Will the Project disturb slopes steeper than 2.5:1 and ditch gradients greater than 5%?
☐	Will the Project cross MnDOT ROW within a designated MS4 boundary[6], as defined by MPCA?
Other pertinent information regarding Construction Stormwater and Erosion/Sediment Control: _____	

Scenic Byways	
☐	Project is within 7 miles of a Scenic Byway (maps: Georilla[7], Enterprise MnDOT Mapping Application [EMMA], Right of Way Mapping and Monitoring [ROWMM]). If yes, list the Scenic Byway(s) and provide the nearest distance: _____ Height of tallest project structure: _____
Other pertinent information regarding Scenic Byways: _____	

[4] Link is only available to MnDOT staff.

[5] Link is only available to MnDOT staff.

[6] For screening purposes only, actual MS4 boundaries may differ from those displayed on viewer.

[7] Georilla viewer only available to MnDOT staff.

Safety Rest Area Program	
☐	Project may directly or indirectly impact an existing rest area (rest area locations), travel information center, wayside, or scenic overlook. This includes temporary closures and disruptions in access to rest area of more than 48 hours.
Other pertinent information regarding Safety Rest Areas: _____	

Airport Influence Area	
☐	Project is within five (5) miles of an airport. (For Airport locations see Airport Influence Maps, but use the 5-mile criterion, not the influence area). If yes, provide name of airport, and distance/direction from project: _____
Other pertinent information regarding Airports: _____	

Railroad Coordination and Railroad Agreement See attached map[8] for Rail Safety and Coordination Project Managers	
☐	Construction activity is expected within 50 feet of the centerline of an individual pair of railroad (RR) tracks
☐	Project limits are estimated to be within 600 feet of any RR tracks
☐	Project involves a detour that directs traffic across a RR grade crossing
Other pertinent information regarding Railroads: _____	

NOTE TO MnDOT REVIEWERS: SEE SUPPLEMENTAL MAPS AND INFORMATION REFERENCED IN THESE RESPONSES

[8] Link is only available to MnDOT staff.

Utility ENM – Supplemental Information Checklist

Applicant(s): Click or tap here to enter text.

Type of Project: Choose an item.

Number of Miles (total project): Click or tap here to enter text.

Number of Miles (collocated with MnDOT ROW): Click or tap here to enter text.

MnDOT Trunk Highways Potentially Impacted Click or tap here to enter text.

NOTE to Applicants: Please provide the following supplemental information, which is required for MnDOT staff to initiate review of utility projects.

☐ Shapefiles in ArcGIS, .kml, and .kmz formats displaying the following Project features:
- ☐ Project Centerline
- ☐ Route/Corridor Width (Construction)
- ☐ Alternative(s)
- ☐ Study Area, if applicable
- ☐ Project Stationing/Mileposting (if defined at time of submittal)
- ☐ Non-linear Project details (if known at time of submittal)
  - ALL associated project facilities (i.e., O&M, laydown yard, Subs, accesses, collection system, water basins, crane paths, etc.)

☐ Overview maps (.pdf format) with MnDOT Trunk Highways and major features identified. Locations of MnDOT right-of-way (ROW) can be identified here.
- ☐ Base layers to include:
  - ☐ Cities
  - ☐ Counties
  - ☐ State Highways / Interstates
  - ☐ Named rivers and waterbodies
  - ☐ Scenic Byways (with 7-mile buffer)
  - ☐ National, State, or County Parks, Recreational Areas, Wildlife Management Areas, etc.

☐ Detailed (zoomed in maps, aerial background, .pdf format) with MnDOT's ROW identified. Detailed maps are only needed for portions of Project that intersect or are collocated with MnDOT ROW. Map extents should show a minimum of 0.5 mile surrounding the MnDOT ROW.
include the following features [note: may require multiple map pages]
- ☐ Public land ownership (federal/state/parks/tribal lands)
- ☐ Protected Biological Resources
  - ☐ Designated Critical Habitat
  - ☐ Rusty Patch Bumble Bee High Potential Zones

- ☐ Minnesota DNR Native Plant Communities
- ☐ Minnesota Biological Survey (MBS) Railroad Rights-of-Way Prairies
- ☐ MBS Sites of Biodiversity Significance

☐ Water Resources and Hydrology

- ☐ National Wetland Inventory (NWI) (or field-delineated) wetlands
- ☐ National Hydrography Dataset (NHD) Waterbodies
- ☐ Floodplains
- ☐ Drinking Water Supply Management Areas
- ☐ MPCA designated special and impaired waters (with a construction related impairment, e.g., turbidity)

☐ Potential Contaminated Sites: What's In My Neighborhood (WIMN) sites within 500-feet of MnDOT's ROW at crossings or co-located areas.

- MPCA WIMN sites: Multiple Programs, Investigation and Cleanup, and Tanks.
- MDA WIMN sites: Small Spills and Investigations, Old Emergencies, Contingency Areas, and Incident Investigations.

☐ Scenic Byways

☐ Corresponding data tables (Excel files) detailing publicly available GIS data displayed on corresponding mapsets. Include easy-to-interpret geographic data (e.g., mileposts, lat/long, PLSS, label IDs) and metadata for each feature so staff can easily cross-reference to the feature on the map.

☐ Temporary workspace and permanent easement typicals (greenfield and co-located, as applicable). Include typical workspace configurations for road crossings, as applicable.

☐ Known occurrences of state- or county-listed noxious weeds (see EDDMapS). A current state list is available here and county lists are here. We recommend consulting with the counties directly to verify their list is current.

☐ Narrative summary of environmental field surveys done to date. Provide an anticipated schedule for completion, if applicable.

- ☐ Cultural Resources
- ☐ Tribal Resources
- ☐ Wetlands and Waterbodies
- ☐ Protected Species / Habitat Assessments
- ☐ Contaminated Materials (Phase I ESA/II)
- ☐ Noxious/Invasive Weeds
- ☐ Other (specify:_____)

☐ Summary of agency consultations/communications/public engagement done to date. If none, provide an anticipated schedule.

☐ Is permanent infrastructure expected to be installed within MnDOT's ROW? If so, provide details.

☐ Is travel across/along MnDOT's ROW anticipated? If so, provide details and anticipated Best Management Practices to be used (e.g., timber matting, erosion/sediment controls, etc.)

☐ Project Schedule/Major Milestones (Minnesota Public Utilities Commission filing, construction/restoration, in-service date, etc.)

****

☐ *Powerlines:* Utility pole typical drawings (if collocated, include drawings of proposed poles in relation to existing)

- ☐ Typical pole spacing lengths
- ☐ Typical pole type (e.g., H-frame, monopole, etc.) and pole material
- ☐ Typical pole footprint and depth
- ☐ Typical pole height and max davit arm width

☐ *Pipelines:*

- ☐ Plan and profile typical drawings of workspace configurations show depth of cover, width of workspaces, topsoil stripping, etc.
- ☐ Pipe diameter and materials

☐ *Wind Farm/Solar Farm/Power Plant/BESS:* (referenced for proximity to trunk highway ROW)

- ☐ Access from trunk highway locations (new/upgraded existing)
- ☐ Collection line and/or Gen-Tie line locations
- ☐ Water basin locations
- ☐ Crane path(s)
- ☐ Step or Substation location
- ☐ Laydown yard
- ☐ O&M building

From:	Kristin Lenz
To:	Heine, Ellen L; Gallay, Benjamin J; Michael Peters; Jacob LaDuke; Gregory, Shawn; Tremayne, Aaron; Coffield, Lucas; Amanda Johnson; Naomi Christenson; Driver, Ann (DOT); stacy.kotch@state.mn.us; Gregor, Nathan (DOT); paul.hartzheim@state.mn.us; kurt.wayne@state.mn.us; Condon, Terry (He/Him/His) (DOT)
Cc:	Minnesota G2BL MN Tribe Agency Correspondence; Dan Ryan
Subject:	G2BL MnDOT Project Introduction - Meeting Notes - 6/16/26
Date:	Tuesday, June 16, 2026 7:41:00 PM
Attachments:	

Thank you all again for your time this morning. Below are notes from our meeting; please reach out if you there are any inaccuracies!

Participants:

Ellen Heine, Ben Gallay (Xcel Energy [Xcel])
Michael Peters, Jacob LaDuke (Dairyland Power Cooperative [DPC])
Shawn Gregory, Aaron Tremayne, Lucas Coffield (GridLiance [GLH])
Kristin Lenz, Amanda Johnson (Merjent)
Ann Driver, Nathan Gregor, Paul Hartzheim, Stacy Kotch Egstad, Kurt Wayne, Terry Condon (Minnesota Department of Transportation [MnDOT])

Heine/Peters provided an overview of the Gopher to Badger Link Project in AGO, describing the two segments.

Segment 1 – 1.5 miles of the proposed route is co-located with I-90. Xcel reviewed other route segments that had longer sections co-located with the MnDOT right-of-way (ROW), but that will not be carried forward for other reasons in the Route Permit application. These alternatives could be reintroduced during scoping conducted by the Minnesota Public Utilities Commission (MPUC). Segment 1 would be a single-circuit 765-kilovolt (kV) transmission line. The current alignment proposes the lattice structures to be located just outside of the MnDOT ROW. Condon inquired on the extent of aerial encroachment into the ROW; Heine indicated that this has not yet been determined. Xcel and DPC (the Applicants) are looking for MnDOT to provide some guidance/insight on the extent of acceptable encroachment into the MnDOT ROW. The MnDOT indicated that Federal Highway Administration (FHWA) approval will be required for any structures within the ROW for I-90; and that that pre-planning/conceptual discussions could be started with the FHWA staff. Driver indicated that MnDOT can follow-up with the FHWA staff to confirm this approach. Official approval of structures within the I-90 ROW would occur via the Utility Accommodation Permit application review and issuance process. MnDOT has requested that the PowerOn Team provide additional information on the safety considerations of the siting 765-kV structures within the ROW on the trunk highway system. MnDOT inquired if additional space would be needed for the lattice structures; Gallay confirmed that for the proposed route, no extra space / setbacks would be needed and that the structures are being designed to comply with the required MnDOT clearances. Further conversation on the safety considerations will occur with the PowerOn group next week.

Wayne indicated that the MnDOT may be planning some snow fencing on the north or south side of

the MnDOT ROW within the 1.5-mile co-located portion of Segment 1; MnDOT would take a closer look at this during the Early Notification Memo (ENM) process. Lenz requested if the MnDOT could provide the latest version of the ENM form. The current proposed route is greater than two miles from the Rochester airport; therefore, MnDOT zoning requirements would not be triggered. Lenz acknowledged that there are likely other crossings of MnDOT ROW along the proposed route, but wanted to focus on this co-location segment first, which is the only portion of the proposed route that is co-located with MnDOT ROW.

Lenz explained that the Applicants have received comments from the public suggesting a route alternative along the I-90 corridor from Rochester to La Crosse and inquired if there were any considerations, opportunities, or constraints along this portion of the highway. Wayne (MnDOT planning director) indicated that the I-90 improvements between Rochester and Winona segment is currently occurring; no additional improvements are currently planned over the next 10 years. MnDOT is looking at adding snow fences from Rochester east; this would generally occur just outside of the MnDOT ROW. If any improvements were to occur in the next several years, it would likely include improvements at interchanges for safety. MnDOT recommend that the alignment be moved further outside of the MnDOT ROW from the interchanges to allow for these potential future improvements. A new truck stop has been proposed on the southwest side of the St. Charles interchange; there is likely to be other development pressure in this area in the future.

MnDOT has purchased scenic easement rights from the adjacent landowners along this portion of I-90, particularly east from Nodine/Enterprise towards the Mississippi River Valley. Generally, utilities are not allowed within the scenic easements (Sec. 173.04 MN Statutes). The MnDOT ROW and Monitoring mapping application (Right of Way Mapping and Monitoring - MnDOT) show the scenic easement boundaries; for the last 4 miles from Nodine to the river, the scenic easement (indicated as "SC" on the MnDOT ROW maps) extends up to over 1,000 feet from MnDOT ROW. Additional details are provided by parcel at the bottom of the ROW map. These are also recorded at the County Courthouse. Each easement has an associated Commissioner's Order, which are available to the public (MnDOT eDOCS Public Web - Profile Search); MnDOT can help identify the Commissioner's Order number associated with each easement if not readily accessible. MnDOT also offered to take a closer look at the I-90 route alternative if needed for the Route Permit application.

Hartzheim mentioned that the MnDOT also maintains a scenic easement along the Great River Road along the Mississippi River and that the Applicants should reach out to the Mississippi River Parkway Commission (MRPC). Lenz confirmed that a Project introduction letter was sent out to the MRPC in late May. The proposed route would cross the Great River Road along the existing 161-kV transmission line.

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

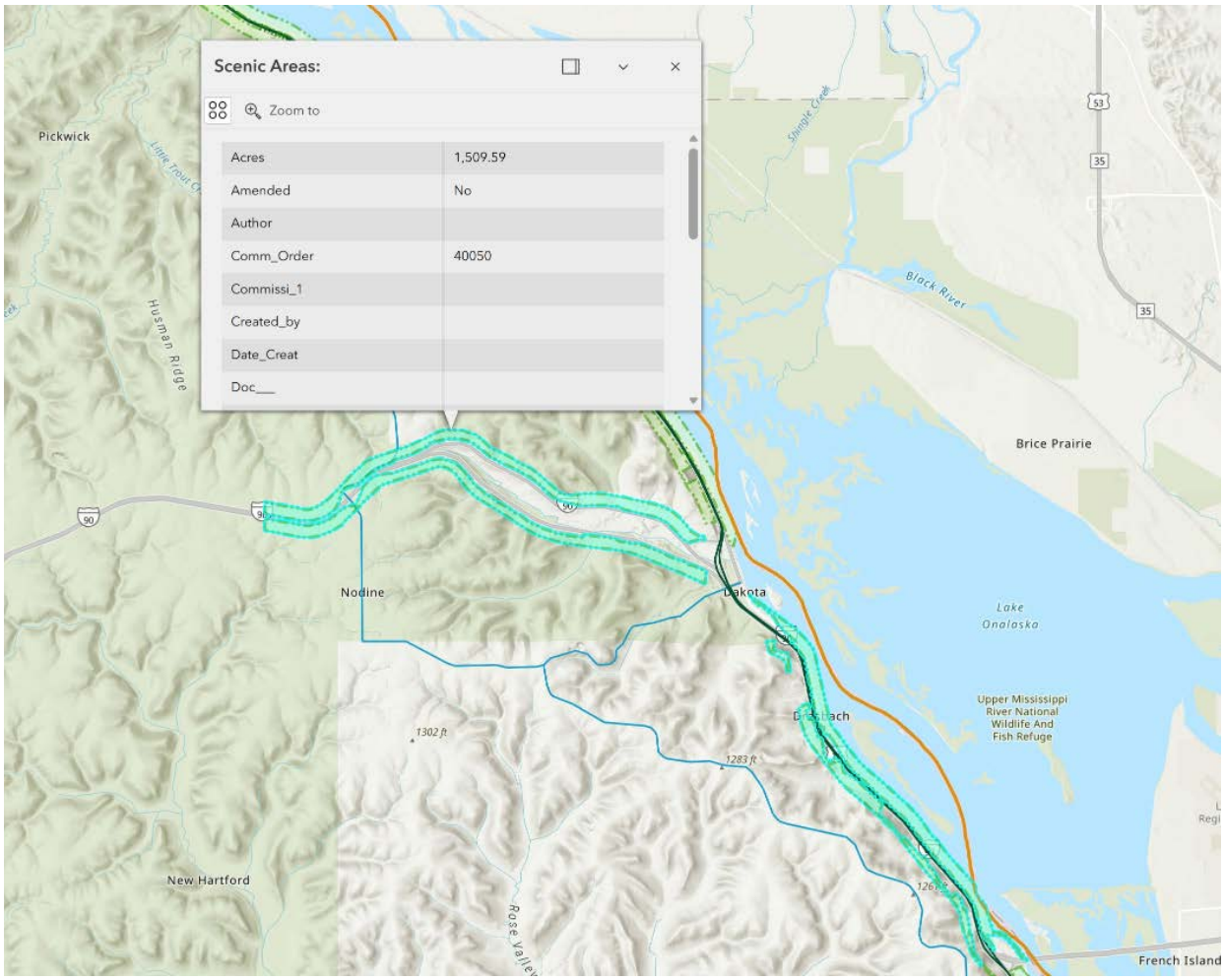
From: Kristin Lenz
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: EXTERNAL: RE: Gopher to Badger Link I-90 Scenic Easements
Date: Monday, July 13, 2026 1:18:23 PM
Attachments:

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Monday, July 13, 2026 12:12 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: RE: EXTERNAL: RE: Gopher to Badger Link I-90 Scenic Easements

According to my findings, all of the scenic areas along I90 on the eastern edge of Winona County fall under Commissioner's Order # 40050: https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/DisplayDoc?docnumber=1043660&identifier=1043660



From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Monday, July 13, 2026 10:46 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: RE: EXTERNAL: RE: Gopher to Badger Link I-90 Scenic Easements

Good morning Stacy,

These are all located in Winona County.

Thanks!
Kristin

Kristin Lenz
Senior Project Manager
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kristin.lenz@merjent.com

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From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>

Sent: Monday, July 13, 2026 10:43 AM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: EXTERNAL: RE: Gopher to Badger Link I-90 Scenic Easements

CAUTION: This email originated from outside of Merjent.

Good Morning, Kristin,

Could you confirm the Counties in these requests? I can then send along ALL Commissioner's Orders for scenic easements/areas along I90 in those counties. Easier and faster (for me anyway).

Thanks much,

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
651-358-0786

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Monday, July 13, 2026 10:26 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Naomi Christenson <naomi.christenson@merjent.com>
Subject: Gopher to Badger Link I-90 Scenic Easements

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Good morning Stacy,

We have gone through the MnDOT ROW plat maps and identified scenic easements along the eastern end of I-90 near the state line. We were unable to identify the Commissioner's Order numbers so that we can pull these easements – would MnDOT be able to provide the Commissioner Order numbers for these? I have the link to the page where I can download those easements.

Thank you!
Kristin

Kristin Lenz
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Minnesota Indian Affairs Council

From: Kevin Mieras
To: MIAC Cultural Resources
Cc: Michael Peters; Heine, Ellen L; Kristin Lenz
Subject: Project review request - Gopher to Badger Link Transmission Project
Date: Tuesday, August 11, 2026 10:27:21 AM
Attachments:

Hello,

Please see the project review request for the Gopher to Badger Link Transmission Project. The submission includes:

- Project review form
- Project cover letter
- Project overview map

Please do not hesitate to reach out with any questions.

Thank you,

Kevin Mieras
612.924.3978 direct
612.558.6982 mobile
kevin.mieras@merjent.com

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MINNESOTA
INDIAN AFFAIRS COUNCIL

161 Rondo Ave, Ste 919, Saint Paul, MN 55103
MIAC.Culturalresources@state.mn.us

Date: 10-07-2026
Michael Peters
Northern States Power Company, doing business as Xcel Energy, and Dairyland Power Cooperative
6087871300
michael.peters@dairylandpower.com

Project Information

Project Name: Gopher to Badger Link 765 kV High Voltage Transmission Line Project

Submitter's Project ID:

Known or Suspected Cemeteries

- ☐ Platted Cemeteries
- ☐ Unplatted Cemeteries
- ☑ Burial Files 21WBa, 21HUv, 21OLad, and 21OL0003
- ☐ Authenticated Burial

Notes/Comments

Thank you for the opportunity to comment on the above-listed project. I have reviewed this project pursuant to the responsibilities given to the Minnesota Indian Affairs Council by the Private Cemeteries Act (Minn. Stat. § 307.08), and the Minnesota Field Archaeology Act (Minn. Stat. § 138.31-.42).[G(1.1]
The Area of Potential Effect ("APE") is located within/adjacent to burial sites 21WBa, 21HUv, 21Olad, and 21OL003. As well as archaeological sites 21GD0324, 21HU0162, 21HUz, 21FL0146, 21FL0089, 21FL0083, 21FL0084 (NRHP), 21FL0085, 21FLbc, 21FL0076, 21FL0077, 21FL0079, 21FL0080, 21FL0082, 21FL0081, 21FL0074, 21FL0143, 21FL0144, 21FL0158, 21FL0159, 21MW0046, 21MW0047, 21MW0045, 21MW0037, 21MW0038, 21MW0039, 21MW0004, 21MW0011, 21MW0014, 21MW0016, 21MW008 (NRHP Grand Meadow Quarry), 21MW0009, 21MW0010, 21MW0098, 21MW0099, 21MW0087, 21OLaa, 21OL0042 , which will require the input of the Office of the State Archaeologist and/or the State Historic Preservation Office. The Grand Meadow Quarry portion of the project will also need to be consulted with the Archaeological Conservancy, Midwestern Regional Director.
Because this [known or suspected] cemetery or burial site is within private lands or waters in the State of Minnesota, you will have to obtain approval from the Office of the State Archaeologist and the Minnesota Indian Affairs Council to conduct archaeological work. Approval applies only to Authentication (also referred to as Condition Assessment), cemetery, and burial-related fieldwork conducted under Minnesota Statute § 307.08 on private land. Condition Assessments are at the discretion of the appropriate authority (Minn. Stat. § 307.08, Subd. 3a).
As such, Phase I archaeological survey shall occur as is the appropriate measure to be taken prior to any ground disturbance within and adjacent to the boundaries of the cemeteries and archaeological sites.
If the ground disturbing activities will affect culturally sensitive areas, avoidance is the appropriate measure to be taken.
Construction Monitoring during all ground disturbing activities is required within and along the boundaries of the American Indian cemetery site and recommended 50 feet in every direction from the boundaries of the

cemetery site.
It is also recommended that the Phase I survey continue throughout the entire APE as there is potential for archaeological resources and human remains.
Cemetery soils cannot be moved outside of cemetery site boundaries without written permission from the Minnesota Indian Affairs Council. Cemetery soil cannot be mixed with construction materials such as concrete.
A cemetery site's classification as disturbed does not negate its status as a cemetery.
The staging and driving of machinery and vehicles are not permitted within cemetery site boundaries unless on paved roads or on protective matting. This may never occur on burials or mounds. Protective fencing may be necessary to protect the burials or mounds.
Please have an approved Inadvertent Discovery Plan in place. If human remains are found during ground disturbing activities, immediately contact law enforcement and the appropriate authority.

Recommendations

- ☐ Not Applicable
- ☐ No Concerns
- ☑ Monitoring
- ☑ Avoidance
- ☐ Phase Ia – Literature Review
- ☑ Phase I – Reconnaissance survey
- ☐ Phase II – Evaluation
- ☐ Phase III – Data Recovery
- ☑ Other Tribal Involvement, develop inadvertent discovery plan

If you require additional information or have questions, comments, or concerns please contact our office.

Sincerely,

Isaac Weston
Cultural Resource Manager
Minnesota Indian Affairs Council
161 Rondo Avenue, Ste. 919
Saint Paul MN 55103
612-512-8391
isaac.weston@state.mn.us

State Historic Preservation Office

From: Aaron Armstrong-Duarte <aaron.armstrong-duarte@merjent.com>
Sent: Monday, July 27, 2026 8:41 AM
To: MN_ADM_ENV Review SHPO <enreviewshpo@state.mn.us>
Cc: Kristin Lenz <kristin.lenz@merjent.com>; Kevin Mieras <kevin.mieras@merjent.com>
Subject: Gopher to Badger Link Project - Phase Ia Submittal

Dear SHPO,

On July 27, 2026, Merjent, Inc., on behalf of Xcel Energy and Dairyland Power Cooperative, submitted to the Office of the State Archaeologist Portal reports submittal module a Phase Ia literature review for the Gopher to Badger Link Project in Goodhue, Wabasha, Olmsted, Mower, Fillmore, and Houston Counties, Minnesota. Merjent, Inc., on behalf of Xcel Energy and Dairyland Power Cooperative, respectfully requests your review and comment on the Phase Ia literature review.

The document is titled:
Phase Ia Literature Review for the Gopher to Badger Link Project Goodhue, Wabasha, Olmsted, Mower, Fillmore, and Houston Counties, Minnesota

Please find the review request submittal letter attached to this email. Please let me know if you have any questions.

Thanks,

Aaron Armstrong-Duarte, PhD
612.924.3986 direct

July 27, 2026 **VIA Email**

Minnesota State Historic Preservation Office
50 Sherburne Ave.
St. Paul, MN 55155
ENReviewSHPO@state.mn.us

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

To Whom it May Concern:

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, (Xcel Energy) and Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) (together, Applicants) are proposing to construct the Gopher to Badger Link Project (Project) in Goodhue, Wabasha, Olmsted, Mower, Fillmore, and Houston Counties, Minnesota.

The Project is part of a planned 765-kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of the following:

- **Segment 1**: Approximately 39 miles of single-circuit 765 kV high voltage transmission line between the existing North Rochester Substation and a point near Marion, Minnesota;
- **Segment 2**: Approximately 105 miles of 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the eastern border of Minnesota. Segment 2 also includes a new three-circuit breaker 161 kV switching station in Houston County, Minnesota, as well as minor upgrades at existing 161 kV Adams and Harmony substations to support operation of the new Project facilities; and
- **Q-9 Reroute**: Rerouting of approximately 1.4 miles of Dairyland's existing Q-9 161 kV line to connect to the proposed switching station.

The Applicants intend to submit a Route Permit Application to the Minnesota Public Utilities Commission (MPUC) in Fall 2026 pursuant to Minnesota Statutes Chapter 216I.

Merjent, Inc. (Merjent) conducted a Phase Ia literature review of cultural resources reports, archaeological sites, historical cemeteries, and historic architectural resources within the 765 kV and Q-9 Route Widths or Proposed Routes plus a 1-mile buffer (Study Area) using information provided by the Minnesota State Historic Preservation Office (SHPO) and Office of the State Archaeologist (OSA), as well as historical atlases, historical aerial photography, and nineteenth-century General Land Office maps. The Phase Ia literature review has been uploaded to the OSA website for your review. Please reach out with any questions or concerns.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

DEPARTMENT OF ADMINISTRATION
STATE HISTORIC PRESERVATION OFFICE

August 26, 2026

Michael Peters
Dairyland Power Cooperative
Michael.Peters@dairylandpower.com

And

Ellen Heine
Xcel Energy
Ellen.L.Heine@xcelenergy.com

RE: Gopher to Badger Link 765 kV High Voltage Transmission Line Project
Goodhue, Wabasha, Olmsted, Mower, Fillmore, and Houston Counties
SHPO Number: 2026-1342

Dear Michael Peters and Ellen Heine:

Thank you for reaching out to the State Historic Preservation Office regarding a project that will require a permit from the Minnesota Public Utilities Commission (PUC). Based on the legislative changes and guidance at the PUC, we understand that you have reached out to our office during the permit pre-application outreach. The PUC permit application is required to address "archaeological and historic resources," which have been defined in PUC guidance.

We have reviewed the archaeological literature review, *Phase Ia Literature Review for the Gopher to Badger Link Project Goodhue, Wabasha, Olmsted, Mower, Fillmore, and Houston Counties, Minnesota,* prepared by Merjent, Inc. in July 2026. We understand that Merjent has recommended an archaeological survey to identify archaeological sites that may be affected by the proposed project and we agree that this is appropriate. We note that there are thirteen previously documented archaeological sites that are within the proposed route corridor that are either unevaluated or have been determined eligible for listing in the National Register of Historic Places. We recommend that the proposed project avoid impacting these sites pursuant to PUC guidance. If the sites cannot be avoided, we recommend that those that are not yet evaluated be evaluated to determine their eligibility. If eligible archaeological sites cannot be avoided by the proposed project, we look forward to additional coordination pursuant to PUC guidance. We have listed the previously documented archaeological sites that are unevaluated and/or previously determined eligible below.

- 21FL0081
- 21FL0082
- 21FL0083
- 21FL0084
- 21FL0085
- 21FL0089
- 21MW0009
- 21MW0014
- 21MW0037
- 21MW0038
- 21MW0039
- 21OLaa

- 21OL0042

Please keep in mind that under state statute, 216I.18, the PUC is responsible for satisfying the requirements under Minnesota Statute 138.665 because the PUC makes the decision on whether to issue a permit and what conditions should be included in the permit.

Based on the literature review report, we understand that there are nine properties listed in the National Register of Historic Places near the proposed project area and one property listed in the State Register of Historic Places. Pursuant to Minnesota Statute 138.665, "The state, state departments, agencies, and political subdivisions, including the Board of Regents of the University of Minnesota, have a responsibility to protect the physical features and historic character of properties designated in sections 138.662 and 138.664 or listed on the National Register of Historic Places created by Public Law 89-665. Before carrying out any undertaking that will affect designated or listed properties, or funding or licensing an undertaking by other parties, the state department or agency shall consult with the State Historic Preservation Office pursuant to the State Historic Preservation Office's established procedures to determine appropriate treatments and to seek ways to avoid and mitigate any adverse effects on designated or listed properties." **We look forward to consulting with the PUC as described in state statute. If the Dairyland Power Cooperative and Xcel Energy are authorized by the PUC to consult our office under state statute, please provide a copy of the authorization to our office when you are prepared to initiate consultation under this state statute. We have included the list of properties below.**

- George Baslington Farmhouse (GD-PIT-00011)
- the Benike Family Barn (OL-FRM-00020)
- the Viola Cooperative Creamery (OL-VIO-00004)
- the Ballard House (HU-SGC-00025)
- Booth Post No. 130 – Grand Army of the Republic Hall (MW-GRA-00005)
- the Exchange State Bank (MW-GRA-00002)
- the Harmony Commercial Historic District (FL-HRC-00019, including 11 contributing structures)
- the McMichael Grain Elevator (FL-HRC-00008)
- Grand Meadow Chert Quarry (21MW0008/MW-GMT-00001)
- Fugle's Flour Mill (OL-PGT 00026)

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency in order to define an appropriate area of potential effects for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you would like to continue to discuss this project with our office, please send additional material for review via email to ENReviewSHPO@state.mn.us and include the SHPO ERP Number (2026-1342) in your reply.

Please contact Environmental Review Archaeologist Lucy Harrington at lucy.harrington@state.mn.us if you have any questions.

Sincerely,



Amy Spong
Deputy State Historic Preservation Office

CC: Kristin Lenz, Merjent, kristin.lenz@merjent.com
Kevin Mieras, Merjent, kevin.mieras@merjent.com
Aaron Armstrong-Duarte, Merjent, aaron.armstrong-duarte@merjent.com

Goodhue County

From: Beau Kennedy <beaukennedy@yahoo.com>
Sent: Tuesday, May 12, 2026 11:06 AM
To: Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Michael Peters <Michael.Peters@DairylandPower.com>; Kristin Lenz <kristin.lenz@merjent.com>
Subject: EXTERNAL: Mazeppa Township Route Comments

CAUTION: This email originated from outside of Merjent.

Good Morning Kristin
The attached was sent previously to be entered into the record regarding route options through Mazeppa Township in Wabasha County. We encourage route selections that utilize existing utility corridors and also have the least amount of impact to residents, natural areas and not add a new power line river crossing on the Zumbro River. Please accept the attached letter in the record of comment for this route proposal.
Thank you
Mazeppa Township Board

GOODHUE
SOIL & WATER
CONSERVATION DISTRICT

Goodhue County SWCD
104 East 3rd Ave, P.O. Box 335
Goodhue, MN 55027
651-923-5286 Ext. 4
www.goodhueswcd.org

Kristin Lenz
Senior Project Manager
Merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414

Dairyland and Xcel Energy – Gopher to Badger Link – Route Options

Ms. Lenz,

Please accept the following comments from Goodhue SWCD regarding the route options outlined in your email dated May 1, 2026, submitted on behalf of Dairyland and Xcel Energy.

Wetland Avoidance
When identifying new transmission line locations, please ensure compliance with the Minnesota Wetland Conservation Act, including adherence to avoidance requirements (Minnesota WCA Rule 8420.0100 Subp. 1C.), stating "avoid direct or indirect impacts from activities that destroy or diminish the quantity, quality, and biological diversity of wetlands".

Use of Existing Corridors
We recommend prioritizing routes that follow existing roadways and utility rights-of-way in an effort to minimize new land disturbance and fragmentation of cropland and woodland land uses.

Wildlife Habitat Protection
Please avoid disturbance to established wildlife habitat areas, including woodlands and other ecologically sensitive regions.

Thank you for the opportunity to provide input. We appreciate your consideration of these recommendations to help avoid potential negative environmental impacts associated with this proposed transmission project.

Sincerely,

Beau Kennedy
District Manager
Goodhue SWCD

From: Smith, Megan
To: Kristin Lenz
Cc: Michael Peters; Heine, Ellen L
Subject: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options
Date: Monday, May 4, 2026 8:32:28 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Kristin,

Thanks for the email with the map and letter. I've been following the project progress and will be in touch with any questions or comments. Thanks,

Megan Smith | Land Use Management Director
Land Use Management | 509 W. 5th Street Red Wing, MN 55066
P: 651-385-3103 | **F:** 651-267-4872 | **E:**
megan.smith@goodhuecountymn.gov
Facebook | Jobs

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, May 1, 2026 4:31 PM
To: Smith, Megan <megan.smith@goodhuecountymn.gov>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: Gopher to Badger Link Project Introduction - Route Options

You don't often get email from kristin.lenz@merjent.com. Learn why this is important

External Email - Use caution opening links or attachments!

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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From: Kennedy, Beau
To: Kristin Lenz
Cc: Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence; Dvorak, Ben; Christiansen, Dilan T (BWSR)
Subject: EXTERNAL: RE: Gopher to Badger Link Project Update
Date: Monday, August 17, 2026 8:10:21 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Good morning

The SWCD did submit comment on the transmission route back in May to Ms. Lenz. We attached a letter emphasizing the proposed route utilize existing utility corridors and avoid wetland impacts and segmenting woodlands.

Thank you for your consideration.

Beau Kennedy
District Manager
bkennedy@goodhueswcd.org
651-923-5286 Ext 114
www.goodhueswcd.org
104 East 3rd Ave/PO Box 335
Goodhue, MN 55027

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 1:56 PM
To: Kennedy, Beau <bkennedy@goodhueswcd.org>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Dvorak, Ben <ben.dvorak@goodhueswcd.org>; Christiansen, Dilan T (BWSR) <dilan.t.christiansen@state.mn.us>
Subject: Gopher to Badger Link Project Update

Some people who received this message don't often get email from kristin.lenz@merjent.com. Learn why this is important

External Email - Use caution opening links or attachments!

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South

Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com
merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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GOODHUE
SOIL & WATER
CONSERVATION DISTRICT

Goodhue County SWCD
104 East 3rd Ave, P.O. Box 335
Goodhue, MN 55027
651-923-5286 Ext. 4
www.goodhueswcd.org

Kristin Lenz
Senior Project Manager
Merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414

Dairyland and Xcel Energy – Gopher to Badger Link – Updated Route Options

Ms. Lenz,

Please accept the following comments from Goodhue SWCD regarding the route options outlined in your email dated August 12th, 2026, submitted on behalf of Dairyland and Xcel Energy.

Wetland Avoidance - When identifying new transmission line locations, please ensure compliance with the Minnesota Wetland Conservation Act, including adherence to avoidance requirements (Minnesota WCA Rule 8420.0100 Subp. 1C.), stating "avoid direct or indirect impacts from activities that destroy or diminish the quantity, quality, and biological diversity of wetlands".

Use of Existing Corridors - We recommend prioritizing routes that follow existing roadways and utility rights-of-way in an effort to minimize new land disturbance and fragmentation woodland land uses.

Wildlife Habitat Protection - Please avoid disturbance to established wildlife habitat areas, including woodlands and other ecologically sensitive regions in the routing process. Transmission line ROW are far less disruptive to the landscape when existing utility corridors or row crop agricultural uses are present.

Thank you for the opportunity to provide input. We appreciate your consideration of these recommendations to help avoid potential negative environmental impacts associated with this proposed transmission project.

Sincerely,

Beau Kennedy
District Manager
Goodhue SWCD

Houston County

Gopher to Badger Link Project
Houston County Project Meeting
July 29, 2026

Participants:

Dairyland Power Cooperative:

- Michael Peters
- Jacob LaDuke
- Branden Yates

GridLiance

- Jessica Hewitt
- Laurie Dunham
- Shawn Gregory
- Aaron Tremayne

Merjent

- Kristin Lenz

Houston County

- Commissioner Greg Myhre
- Commissioner Cindy Wright
- Brent Parker- County Coordinator
- Brian Pogodzinski - Highway Commissioner/ Airport Contact
- Alison Wagner- Economic Development Coordinator and Brents Assistant

Environmental Discussion:

- Lenz provided an overview of the permitting process. Xcel Energy and Dairyland (the Applicants) submitted a Certificate of Need application to the Minnesota Public Utilities Commission (MPUC) in February 2026.
- The Applicants are currently preparing a Route Permit application, with intent to file with the MPUC in Fall 2026. That Application includes an assessment of transportation-related impacts, including County roads and airports.
- The proposed right-of-way only crosses Houston County and Township roads along Dairyland's existing 161 kilovolt (kV) transmission line; it does not parallel any roads.
- Action Item: Commissioner Cindy Wright asked for a list of the Houston County and township roads that the proposed right-of-way will cross. Lenz is following up on this request
- Commissioner Myhre asked what happens if a township denies our request to cross their road
- Lenz indicated that upon receipt of the Applicants' Route Permit application, the MPUC will initiate a scoping process and hold informational meetings in the Project area. The MPUC will solicit comments from the public regarding issues, concerns and potential route alternatives to assess in their Environmental Impact Statement for the Project. The MPUC will ultimately make a determination on the route.

- The Applicants expect to initiate road permit applications in 2029 after the Minnesota Public Utilities Commission issues a decision on the Certificate of Need and Route Permit and the final Project design has been issued.

Airport Discussion:

- Houston County is currently developing an approach procedure, which should be complete the beginning of 2027.
- Pogodzinski indicated that there is no current plan for expansion of the Houston County Airport in the 20-year master plan.
- The airport building consists of two “T-Hangers”.
- Pogodzinski noted that nothing is being developed that could impact the Proposed Route.
- Gregory requested to establish a line of communication with the County for future airport design-related questions.
- The 2010 airport master plan discussed a 7-degree shift to the tarmac with an expansion to the south and east but that has since been eliminated.

Questions:

- Parker - what happens if this route isn’t approved. Are you exploring other routes?
    - Hewitt explained that the Route Permit application includes a section that evaluates alternatives that have not been carried forward; however, the new 216I requirements that were put into place in July 2025 do not require the Applicants to propose more than one route in the Route Permit application.
    - Lenz reinforced that upon receipt of the Route Permit application, the MPUC will initiate the scoping process and hold informational meetings in the Project area. The MPUC will solicit comments from the public, including potential route alternatives, to evaluate in their Environmental Impact Statement.
- Commissioner Wright- Is there an underground build out option? The Commissioner requested that the Applicants provide further information on this to share with inquiring constituents.
    - Gregory provided an explanation of the engineering and environmental challenges associated with burying a 765 kV line.
    - There is currently a technology limitation for buried alternating current (AC) solutions at this voltage class. 765 kV AC does not have a cable rated for underground at scale.
    - Increased environmental impact caused by continuous trench(es) for this solution. Splice boxes every 1,500 to 2,000 feet, which are concrete vaults.
    - If you could bury a 765 kV AC line, you’d need reactive compensation stations every 3-5 miles due to voltage charge effect of buried applications.
    - Tremayne mentioned that maintenance is impaired for extra high voltage buried applications as it’s challenging to locate a fault.

        - Action Item: provide the Commissioner the language from the Certificate of Need that evaluates this option (Lenz) and provide an FAQ on this topic on the Project website (Hewitt/Jacobson).
- Commissioner Mhyre - Inquired about why this transmission line is “okay” in the air but not underground
    - Gregory reiterated the prior points on the additional environmental impacts and lack of technology.
- Commissioner Wright - Inquired about the number of additional substations needed in Houston County and what other build out is needed with the proposed line
    - Gregory explained that the existing Adams and Harmony substations will be upgraded for the rebuilt 161 kV transmission lines and a new switching station will be installed in Houston County for the 161 kV rebuilds.
- Commissioner Myhre - Asked what happens to the old poles
    - Gregory explained that the old 161 kV transmission line structures will be removed and replaced with the new 765 kV / 161 kV double-circuit structures.
- Pogodzinski - Asked how many of these structures will be across Houston County
    - Gregory/Tremayne estimated around 100 structures over the approximately 25 miles of the route across Houton County based on average span length.
- Pogodzinski - asked about weight loads for Road Use Agreements and Oversize/Overwidth permits
    - Gregory/Tremayne indicated that information is not currently available, but will be provided once the Project is further along in the permitting and design process.

From: Kurt Zehnder
To: Kristin Lenz
Cc: Brent Parker; Eric Johnson; Robert Schuldt; Cindy Wright; Greg Myhre
Subject: EXTERNAL: Re: Gopher to Badger Link Project Update
Date: Thursday, August 13, 2026 11:27:45 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Good morning, I like many people have great concerns with this unnecessary transmission line. I don't believe you have answered the most important questions when it comes to the health of people affected by this unnecessary line. You have not demonstrated at all the benefit to Houston County. As a representative of the people in my district of Houston County I will not support this project.
Good Day

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 4:42 PM
To: Brent Parker <BParker@HoCoMN.gov>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Cindy Wright <CWright@HoCoMN.gov>; Eric Johnson <EPJohnson@HoCoMN.gov>; Kurt Zehnder <KZehnder@HoCoMN.gov>; Robert Schuldt <RSchuldt@HoCoMN.gov>; Greg Myhre <GMyhre@HoCoMN.gov>
Subject: Gopher to Badger Link Project Update

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Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact

Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
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From: Kristin Lenz
To: Kristin Lenz
Subject: FW: EXTERNAL: FW: [EXT] Proposed 765kV Transmission line route
Date: Monday, October 19, 2026 4:31:24 PM

From: Winnebago Township Clerk <winnebagotwpclerk@gmail.com>
Sent: Monday, September 14, 2026 8:09 AM
To: Michael Peters <michael.peters@dairylandpower.com>; Ellen.L.Heine@xcelenergy.com
Subject: [EXT] Proposed 765kV Transmission line route

Landowners across the township are united in their opposition to the proposed 765 kV transmission line. The project would have significant impacts on farms, homes, property values, and the rural character of our community. We believe there are better alternatives and are asking decision-makers to listen to the landowners who would be directly affected. Our message is clear: **we do not support this transmission line through our township.**

Sent on behalf of the Winnebago Township Board.

--
Bonnie Giesler, Clerk
Winnebago Township

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"Zero By Choice - Everyone Home Safe Every Day"

From:	Kristin Lenz
To:	Kristin Lenz
Subject:	FW: EXTERNAL: FW: Gopher To Badger Link: Jefferson Township
Date:	Wednesday, October 28, 2026 9:20:26 AM

From: Anne Falken <falken@alumni.umn.edu>
Sent: Wednesday, October 28, 2026 5:44 AM
To: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>; michael.peters@dairylandpower.com
Subject: Gopher To Badger Link: Jefferson Township

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Report as a Suspicious Email

This is Jefferson Township's response to your 8/12/26 letter to our Chair, Dale Neumann, and our Clerk, Anne Falken, regarding the above-stated project.

Jefferson Township in Southeast Minnesota represents many taxpayers against this project. The route you have proposed goes directly through farmland, woods, sink holes, a very karst geology, and an extremely scenic area known as the Driftless Area. Tourism, hunting and fishing are very important here, as well as generational agriculture. The visual aspect of this 765/161 kV proposed projected line would drastically change what we have lived here for all of our lives. There are many generational properties in Jefferson Township, and we wish to pass on to our children and grandchildren the same land we have sacrificed to keep. This line would no doubt cause significant change to our properties, and decrease our property values.

We feel that this proposed high voltage line, with the noise levels and EMF it produces, will have repercussions for both people and livestock that isn't totally known. There are also agricultural concerns, both in difficulty working the land around poles, and the unknown topographical effects to our driftless, karst geology. There are concerns about increased rates in electric bills, and damage to our township roads

We question the "need" for this project in our area, when the benefits are largely needed elsewhere. We value our livestock and farming as it is, the purity of our water, the abundance of wildlife, and most of all our health and that of our descendants. We strongly oppose this 765/161 kV route through Jefferson Township.

Jefferson Township Board

Mower County

From: Kristin Lenz
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: External: Gopher to Badger Link Project Introduction - Route Options
Date: Monday, May 11, 2026 4:41:18 PM
Attachments:

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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From: Mitch Wenum <mitchw@co.mower.mn.us>
Sent: Monday, May 11, 2026 3:59 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: RE: External: Gopher to Badger Link Project Introduction - Route Options

Kristin,

Thanks for the information. My understanding is that the new line follows the existing line. I do not have any comments on the route at this time.

Thanks,

Mitch Wenum, PE
Mower County Engineer
1105 8th Ave NE
Austin, MN 55912
507-437-7718
MitchW@co.mower.mn.us
MOWER COUNTY

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, May 8, 2026 4:21 PM
To: Mitch Wenum <mitchw@co.mower.mn.us>

Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: External: Gopher to Badger Link Project Introduction - Route Options

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Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

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Senior Project Manager
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From:	Kristin Lenz
To:	Angie Lipelt; Zoning
Cc:	Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence; Valerie Sheedy; Mitch Wenum; Mindy Williamson; Keith Bollinger
Subject:	RE: Gopher to Badger Link Project Update
Date:	
Attachments:	

Hi Angie,

Thanks for the call today. Below I've listed some additional resources that we used to develop the Route Permit application related to electric magnetic fields (EMF).

Electric and Magnetic Fields from Power Lines | US EPA

Tables describing EMF output from household devices is available from the EPA here: EMF-Portal | EMF in your Environment: Magnetic Field Measurements of Everyday Electrical Devices

There is a fact sheet developed for the Project on EMF as well available on the Project's website: GTBL_EMF_Factsheet_2026.pdf

Please let me know if you have any further questions! Thank you and have a nice weekend.

Kristin

Kristin Lenz
Senior Project Manager
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kristin.lenz@merjent.com

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From: Kristin Lenz
Sent: Friday, August 14, 2026 1:11 PM
To: 'Angie Lipelt' <angiel@co.mower.mn.us>; Zoning <zoning@CO.MOWER.MN.US>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Valerie Sheedy <valeries@CO.MOWER.MN.US>; Mitch Wenum <mitchw@co.mower.mn.us>; Mindy Williamson <Mindyw@CO.MOWER.MN.US>; Keith Bollinger <Keithb@CO.MOWER.MN.US>
Subject: RE: EXTERNAL: RE: Gopher to Badger Link Project Update

Thank you for this information Angie, much appreciated.

Yes – you are correct. The proposed 765 kV line follows Dairyland's existing 161 kV transmission. The old 161 kV structures would be removed and the 765 kV and 161 kV lines would be installed on new lattice structures through that same corridor, with some minor deviations.

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
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kristin.lenz@merjent.com

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From: Angie Lipelt <angiel@co.mower.mn.us>
Sent: Friday, August 14, 2026 12:14 PM
To: Kristin Lenz <kristin.lenz@merjent.com>; Zoning <zoning@CO.MOWER.MN.US>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Valerie Sheedy <valeries@CO.MOWER.MN.US>; Mitch Wenum <mitchw@co.mower.mn.us>; Mindy Williamson <Mindyw@CO.MOWER.MN.US>; Keith Bollinger <Keithb@CO.MOWER.MN.US>
Subject: RE: EXTERNAL: RE: Gopher to Badger Link Project Update

Dear Kristin,
Please correct me if I am wrong; it appears that most of this corridor is already in existence for the same/similar purpose throughout Mower County. I see a new segment that is just under 2 miles in Lodi Township. Do I have the gist of this project for Mower County correct?

When I looked through the corridor the only things that came to mind for me, regarding this project are the following: (being that your team is or has looked at all those other features discussed previously).

- The Rochester Airport is expanding their airport protection areas because they are adding precision landing equipment which runway protection zones to their facility into Mower, Dodge and Freeborn County. Olmsted County will likely provide you with that information during their review. Olmsted County has that information via their planning office.
- Karst region as we discussed, earlier. Our GIS Staff will be sending you the layer for

Mower County.

- Mower County and the State of MN have 911 communication corridors running throughout the county. You will find those if you do an FCC review.
    - But what you **won't** find is that Mower County has 2 (currently) unused reserve corridors for future use/expansion. The GIS department, via Keith Bollinger, can send you that layer so that you can have those.

Thank you for the opportunity to review this project.

Angela M. Lipelt
Environmental Services Director
Mower County, Minnesota
angiel@co.mower.mn.us
office 507-437-7718
cell 507-438-4717

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, August 14, 2026 10:08 AM
To: Angie Lipelt <angiel@co.mower.mn.us>; Zoning <zoning@CO.MOWER.MN.US>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: RE: EXTERNAL: RE: Gopher to Badger Link Project Update

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Good morning Angie,

Thank you for your response. I've attached the preliminary Route Width (Proposed Route), alignment and right-of-way for the Project that Xcel Energy and Dairyland have assessed as part of its Route Permit application to be submitted to the Minnesota Public Utilities

Commission (MPUC) this fall. The Route Width is representative of a larger study area that we evaluated in the Route Permit application to allow for flexibility when designing the final alignment and right-of-way to avoid sensitive features, incorporate landowner concerns, etc.

Yes, the Applicants have assessed the Project's potential impacts to environmental features, including wetlands, waterbodies, karst features, archaeological features, wildlife, land use, zoning, etc. That information is included in the Route Permit application that will be submitted this fall. Additionally, the MPUC will undertake an extensive review process, which will include scoping for additional potential route alternatives and development of an Environmental Impact Statement for the Project over the next year after submittal of the application. Ultimately, the MPUC will make a determination on both the need and route for the Project.

Specifically regarding karst features, we have reviewed the Minnesota Department of Natural Resources (MDNR) karst feature inventory and we also obtained county-specific data from both Olmsted and Fillmore counties. If you have county-specific data for karst features in Mower County, we would definitely be interested in obtaining that geospatial data.

Please feel free to reach out with any additional questions or comments.

Thank you!
Kristin

Kristin Lenz
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From: Angie Lipelt <angiel@co.mower.mn.us>
Sent: Wednesday, August 12, 2026 3:58 PM
To: Kristin Lenz <kristin.lenz@merjent.com>; Zoning <zoning@CO.MOWER.MN.US>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: EXTERNAL: RE: Gopher to Badger Link Project Update

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Dear Kristen,
Thank you for the information and the informative letter. I am happy to help you to identify any

possible issues within Mower County.

I was wondering if your team could provide me with the route overlaid onto our GIS system, or any equivalent system which shows sections, townships, and underlying terrain. This will help me to identify any areas in the county in which you may encounter issues. This would be beneficial to me, to be able to assist you.

Thanks much for this opportunity. Off the top of my head when thinking about this project – as you may know Mower County is in the Karst region and we do have mapping of known sinkholes and springs. Is it safe for me to assume that your team has looked at sensitive features such as archeological areas, ecological review, shorelands and floodplains? Please let me know,

Sincerely,

Angela M. Lipelt
Environmental Services Director
Mower County, Minnesota
angiel@co.mower.mn.us
office 507-437-7718
cell 507-438-4717

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 1:54 PM
To: Angie Lipelt <angiel@co.mower.mn.us>; Zoning <zoning@co.mower.mn.us>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: Gopher to Badger Link Project Update

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The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

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Olmsted County

From: Kristin Lenz
To: Michael Peters; Heine, Ellen L
Cc: Minnesota G2BL MN Tribe Agency Correspondence
Subject: G2BL Olmsted County Public Works Dept - Meeting Notes - 6/15/26
Date: Monday, June 15, 2026 9:45:00 AM
Attachments:

Participants:
Scott Leary, Tom Canan, Benjamin Johnson, Jeremy Douglas, Eric Stennes, Jeremy Douglas, Nathan Arnold, Nicholas Sanford, Scott Holmes (Olmsted County Public Works Department)
Ellen Heine, Xcel Energy (Xcel)
Michael Peters, Dairyland Power Cooperative (Dairyland)
Kristin Lenz, Merjent

Heine and Peters provided an overview of the proposed route via the Gopher to Bader Link Project (Project) Viewer.

The County inquired on whether the transmission line right-of-way (ROW) will overlap road ROW, specifically where there are existing transmission lines. Heine explained that Xcel looked at sharing road ROW; however, there are a few instances where the proposed route shares road ROW and there are no areas where there would be transmission lines on both sides of the road. There is one short section where the proposed route parallels County Road 11; however, in most cases, the line is not co-located with local roads because there are many residences located along the roads. For smaller voltage lines, utilities often can switch back and forth across the road to avoid homes; however, this is more challenging with larger voltage lines. The County's main concern is if there are locations where the proposed route is co-located with road ROW that the County would want to understand if they have any future projects planned that would require moving structures.

Lenz explained the timeline for the Project – anticipate filing the Route Permit (RP) application with the Minnesota Public Utilities Commission (MPUC) in Fall 2026; this is Certificate of Need (CN)/RP joint proceeding that will take approximately 12-18 months, so RP issuance is anticipated in early 2028. Heine explained that with the new 216i statutes, applicants only have to submit one proposed route as part of the route permit application; however, there will be a scoping process that solicits additional route alternatives. The MPUC will determine which route alternatives are further evaluated in the Environmental Impact Statement. Construction is anticipated to begin in 2029/2030 and would take approximately 3 years.

The County inquired about whether the Project intersects any solar or wind energy projects – viewed these sites on the Viewer. The proposed route does intersect the Lemon Hill solar project area located northeast of Rochester. There would be no direct connection from any of the solar or wind energy projects to the line. Heine mentioned that there are likely developers in the area looking for land options, so there may be new projects coming online as well that the Project is not aware of at this time. Once the Project team becomes aware, outreach will occur to discuss any constraints/considerations.

The County indicated that it does not appear to be any other county-owned land intersected by the proposed route. Requested to review a County road layer to understand where the line intersects or shares County road ROW; Lenz indicated that the Project can provide a centerline shapefile so that the County can review where the alignments are co-located with road ROW. Lenz to provide a shapefile/.kmz of the alignments and also the MPUC docket no. so that they County can subscribe to the Project. If other route alternatives through Olmsted County are suggested by the public, Olmsted County could provide their comments on those alternatives through the RP proceedings.

Thanks,
Kristin

Kristin Lenz
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kristin.lenz@merjent.com

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From:	Kristin Lenz
To:	Benjamin Johnson; Nathan Arnold; Jeremy Douglas; Eric Stennes; Scott Leary; Nicholas Sandford; Tom Canan
Cc:	Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence
Subject:	Gopher to Badger Link Project Intro - Olmsted County Public Works Dept
Date:	Monday, June 15, 2026 2:44:00 PM
Attachments:	

Good afternoon all,

Thanks again for the opportunity to meet with you all this morning regarding the Gopher to Badger Link Project. Attached is the preliminary proposed alignment for your review.

As I mentioned, you can also subscribe to the MPUC docket for Project notifications using docket number TL-26-156. The instructions to subscribe to the docket can be found here: https://mn.gov/puc/edockets/how-to/

Thank you!
Kristin

Kristin Lenz
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From: PW SWCD
To: Kristin Lenz
Subject: EXTERNAL: RE: Gopher to Badger Link Project Update
Date: Monday, August 17, 2026 1:21:21 PM
Attachments:

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Thank you, Kristin.

Skip Langer
Soil Conservation Director
Olmsted Soil & Water Conservation District

1188 50th Street SE
Rochester, MN 55904
Ph # 328-7070
skip.langer@olmstedcounty.gov

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 1:51 PM
To: PW SWCD <swcd@olmstedcounty.gov>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>; Don VanKeulen <don.vankeulen@olmstedcounty.gov>; Christiansen, Dilan T (BWSR) <dilan.t.christiansen@state.mn.us>
Subject: Gopher to Badger Link Project Update

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Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

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Wabasha County

From: Kristin Lenz
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: EXTERNAL: RE: [External Email]Gopher to Badger Link Project Introduction - Route Options
Date: Friday, May 8, 2026 9:38:55 AM
Attachments:

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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From: Kristin Lenz
Sent: Friday, May 8, 2026 9:38 AM
To: 'Peters, Terri - FPAC-NRCS, MN' <terri.peters@mn.nacdnet.net>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Jurgerson, Ella - FPAC-NRCS, MN <Ella.Jurgerson@mn.nacdnet.net>; Dilan.T.Christiansen@state.mn.us
Subject: RE: EXTERNAL: RE: [External Email]Gopher to Badger Link Project Introduction - Route Options

Good morning Terri,

Thank you for your email. The attached .kmz includes the current route options that are being considered. We are planning to file the Route Permit application with the Minnesota Public Utilities Commission this fall, which will only include one route. We anticipate the Route Permit may be issued Q1 2028, at which point we would prepare the final design to facilitate wetland permitting.

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
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763.913.4740 mobile
kristin.lenz@merjent.com

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Minneapolis, MN 55414

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From: Peters, Terri - FPAC-NRCS, MN <terri.peters@mn.nacdnet.net>
Sent: Monday, May 4, 2026 8:31 AM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Jurgerson, Ella - FPAC-NRCS, MN <Ella.Jurgerson@mn.nacdnet.net>; Dilan.T.Christiansen@state.mn.us
Subject: EXTERNAL: RE: [External Email]Gopher to Badger Link Project Introduction - Route Options

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Hi Kristen,

Thank you for the information. We would likely review potential wetland impacts. Do you have a shapefile for the route options that you can share? Sometimes other land use questions come to us for these projects.

Terri Peters
District Manager/Water Planner
Wabasha SWCD
(651) 560 -2044

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Friday, May 1, 2026 4:51 PM
To: Peters, Terri - FPAC-NRCS, MN <terri.peters@mn.nacdnet.net>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Jurgerson, Ella - FPAC-NRCS, MN <Ella.Jurgerson@mn.nacdnet.net>; Dilan.T.Christiansen@state.mn.us
Subject: [External Email]Gopher to Badger Link Project Introduction - Route Options

Some people who received this message don't often get email from kristin.lenz@merjent.com. Learn why this is important

[External Email]
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Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting

Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
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From: Beau Kennedy
To: Heine, Ellen L; Michael Peters; Kristin Lenz
Subject: EXTERNAL: Mazeppa Township Route Comments
Date: Tuesday, May 12, 2026 11:05:54 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Good Morning Kristin
The attached was sent previously to be entered into the record regarding route options through Mazeppa Township in Wabasha County. We encourage route selections that utilize existing utility corridors and also have the least amount of impact to residents, natural areas and not add a new power line river crossing on the Zumbro River. Please accept the attached letter in the record of comment for this route proposal.
Thank you
Mazeppa Township Board

DAIRYLAND POWER COOPERATIVE

Katie Thomson
Call: 608-787-1323
katie.thomson@dairylandpower.com

Eric Jacobson
Call: 608-461-2125
eric.jacobson@dairylandpower.com

Xcel Energy®

Media Relations
Call: 612-215-5300
mediainquiries@xcelenergy.com

Date: 2/2/26

RE: Comments for Stakeholder Engagement - Gopher to Badger Link Transmission Line Project

Please accept the following comments into the record for the stakeholder engagement stage of the Gopher to Badger Link Transmission Line Project. These comments relate specifically to the North Rochester to Marion Segment currently being investigated through Mazeppa Township.

We respectfully request that the following considerations be carefully evaluated when sighting new transmission line routes within the North Rochester to Marion Segment:

1. **Utilize Existing Utility Corridors** - Existing utility and roadway corridors should be prioritized when developing potential routes. Mazeppa Township contains large, contiguous tracts of land that currently have no roads or overhead utility infrastructure, and these areas should be avoided to the greatest extent possible.
2. **Zumbro River Crossing** - Any proposed transmission line crossing of the Zumbro River should occur at a location where overhead transmission lines or road crossings already exist. The northernmost proposed route appears to introduce a new river crossing. Protecting the bluffland and floodplain habitats of the Zumbro River is critically important to the residents of Mazeppa Township, as well as to outdoor recreationists who value this area.
3. **Richard J. Doer Memorial Hardwood Forest** - The protection and continuity of the Richard J. Doer Memorial Hardwood Forest should be carefully considered when proposing routes through forested areas in Mazeppa Township. As noted on the Gopher to Badger Link website, *land within the right-of-way (ROW) may continue to be used for agricultural purposes*; however, in heavily forested areas, a new transmission line ROW would result in permanent land cover change. Conversion from woodland to non-woodland fragments wildlife corridors, degrades large forest blocks, and increases soil erosion on steep, sensitive soils. Forested areas should be avoided whenever feasible.
4. **Home Proximity** - Each of the proposed routes through Mazeppa Township includes numerous homes located within 150 feet of the transmission line. We request that routes be developed to avoid or minimize impacts to residential properties and landowners within the township.

Please accept these comments into the official record for consideration as possible route options are developed for the North Rochester to Marion Segment of the Gopher to Badger Link Transmission Line Project.

Sincerely,

Mazeppa Township Board of Supervisors

Beau Kennedy

Jay Sanborn

David Radtke

From:	Mazeppa Township Clerk
To:	Kristin Lenz
Cc:	Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence; jcsanborn@j-ots.com
Subject:	EXTERNAL: Fwd: Fw: Gopher to Badger Link Project Update
Date:	Thursday, September 3, 2026 3:41:25 PM
Attachments:	

CAUTION: This email originated from outside of Merjent.

Please see attached document regarding comments from Mazeppa Township

Thanks Mazeppa Township Clerk Debra Mathre

From: **Kristin Lenz** <kristin.lenz@merjent.com>
Date: Wed, Aug 12, 2026, 4:45 PM
Subject: Gopher to Badger Link Project Update
To: kiahackman@gmail.com <kiahackman@gmail.com>
Cc: Michael Peters <Michael.Peters@dairylandpower.com>, Heine, Ellen L <ellen.l.heine@xcelenergy.com>, Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>, jcsanborn@j-ots.com <jcsanborn@j-ots.com>

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz

Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
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Date: 8/12/26

RE: Comments for Project Route - Gopher to Badger Link Transmission Line Project

Please accept the following comments into the record for local government unit feedback for the Gopher to Badger Link Transmission Line Project. These comments relate specifically to the North Rochester to Marion Segment currently listed as the proposed route through Mazeppa Township.

We respectfully request that the following considerations be carefully reevaluated for the proposed transmission line through Mazeppa TWP:

1. **Utilize Existing Utility Corridors** - Existing utility and roadway corridors should be prioritized when developing potential routes. Mazeppa Township contains large, contiguous tracts of land that currently have no roads or overhead utility infrastructure, and these areas should be avoided to the greatest extent possible.
2. **Zumbro River Crossing** - Any proposed transmission line crossing of the Zumbro River should occur at a location where overhead transmission lines or road crossings already exist. The northernmost proposed route appears to introduce a new river crossing. Protecting the bluffland and floodplain habitats of the Zumbro River is critically important to the residents of Mazeppa Township, as well as to outdoor recreationists who value this area.
3. **Richard J. Doer Memorial Hardwood Forest** - The protection and continuity of the Richard J. Doer Memorial Hardwood Forest should be carefully considered when proposing routes through forested areas in Mazeppa Township. As noted on the Gopher to Badger Link website, *land within the right-of-way (ROW) may continue to be used for agricultural purposes*; however, in heavily forested areas, a new transmission line ROW would result in permanent land cover change. Conversion from woodland to non-woodland fragments wildlife corridors, degrades large forest blocks, and increases soil erosion on steep, sensitive soils. Forested areas should be avoided whenever feasible.
4. **Home Proximity** - Each of the proposed routes through Mazeppa Township includes numerous homes located within 150 feet of the transmission line. We request that routes be developed to avoid or minimize impacts to residential properties and landowners within the township.

Please reevaluate the current proposed route and accept these comments into the official record for consideration for route options of the Gopher to Badger Link Transmission Line Project through Mazeppa TWP.

Sincerely,

Mazeppa Township Board of Supervisors

Beau Kennedy | Jay Sanborn | David Radtke

From: Kia Hackman
To: Kristin Lenz
Subject: EXTERNAL: Fwd: dam breach route docs
Date: Wednesday, September 9, 2026 1:55:05 PM
Attachments:

CAUTION: This email originated from outside of Merjent.

---------- Forwarded message ---------
From: **Beau Kennedy** <beaukennedy@yahoo.com>
Date: Wed, Sep 9, 2026, 1:07 PM
Subject: RE: dam breach route docs
To: Mazeppa Township Clerk <mazeppatwnshp@gmail.com>, Kia Hackman <kiahackman@gmail.com>, Jay Sanborn <jaysanborn8@gmail.com>

Deb and Kia
Attached is the dam breach route that RPU completed back in 2007. it shows the extent of impact if the Lake Zumbro Power Dam would fail and the inundation downstream that it would cause.

can one of you please forward the message below from the Wabasha County Emergency Management Director and the attachment to

Kristin Lenz kristin.lenz@merjent.com
Eric Jacobson eric.jacobson@dairylandpower.com
and the PUC contact we have:
Jessica Livingston jessica.livingston@state.mn.us
Sam Lobby sam.lobby@state.mn.us

----- Forwarded Message -----
From: Tomlinson, Brenda <btomlinson@co.wabasha.mn.us>
To: Beau Kennedy <beaukennedy@yahoo.com>
Sent: Wednesday, September 9, 2026 at 11:50:56 AM CDT
Subject: RE: dam breach route docs

Hi Beau,
After doing some research, apparently the newer RPU inundation maps aren't different enough from the old one I have to make any difference for what you need. I've attached the map that I have from 2007, it is 11 x 17

Depending on the amount of flooding and whether it's flash flooding from heavy rains or flooding from a dam breach, the power of the flow of water will vary quite a bit. That, the height and spread of the water, and any large debris in the river, could potentially negatively affect any structures downstream.

Please let me know if there is anything else you need. Also, I would appreciate it if you would only use this photo for the issue at hand and not give it out freely.

Thank you,
Brenda

Brenda Tomlinson, Director

Appendix C-2

Tribal Correspondence

TABLE C2-1

Tribal Contacts

Tribal Nation / Organization	Contact Name	Position
Apache Tribe of Oklahoma	Durell Cooper	Chairman
Cheyenne and Arapaho Tribes, Oklahoma	Max Bear	THPO
	Reggie Wassana	Governor
Flandreau Santee Sioux Tribe of South Dakota	Anthony Reider	President
	Garrie Kills-A-Hundred	THPO
	April Herrick	Secretary
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	Randall Werk Sr.	President
	Michael Blackwolf	THPO
Iowa Tribe of Kansas and Nebraska	Missty Slater	Chairwoman
	Randy Teboe	THPO
Menominee Indian Tribe of Wisconsin	David Grignon	Historic Preservation Director
	Joey Awonohopay	Chairman
Santee Sioux Nation, Nebraska	Larry Thomas	THPO
	Alonzo Denney	Chairman
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	Dianne Desrosiers	THPO Program Director
	J. Garret Renville	Tribal Chairman
Spirit Lake Tribe, North Dakota	Kenneth Graywater	Interim Director THPO
	Lonna Jackson-Street	Chairperson
1854 Treaty Authority	Sonny Myers	Executive Director
Bois Forte Band of Chippewa	Amy Drift	Energy Director
	Carlos Hernandez	Chairman
	Jaylen Strong	THPO, Director of the Heritage Center and Cultural Museum
	Jeneal Goggleye	District I Representative S1
	Miranda Lilya	Executive Director
	Shane Drift	District I Representative S2
	Tara Geshick	Secretary Treasurer
	Robert Moyer, Jr.	Vice-Chairperson, District II Representative
Fond du Lac Band of Lake Superior Chippewa	Bill Thompson	Executive Director
	Brad Blacketter	District II Representative
	Bruce Savage	Chairman
	Caleb Dunlap	Communications Director
	Earl Otis	District III Representative
	Ian Young	Staff Attorney
	Scott Buchanan	Staff Attorney
	Wally Dupuis	Vice Chairman & District I Representative
	Wayne Dupuis	Secretary/Treasurer
	Evan Schroeder	THPO
Grand Portage Band of Lake Superior Chippewa	April McCormick	Secretary/Treasurer
	Marie Spry	Tribal Council
	Robert Deschampe	Chairman
	William Myers	District I Representative
	Dean Deschampe	District 2 Representative
	Rob Hull	THPO

TABLE C2-1

Tribal Contacts

Tribal Nation / Organization	Contact Name	Position
	Krishna Woerheide	Environmental Director
Leech Lake Band of Ojibwe	Craig Tangren	Environmental Deputy Director
	Gina Lemon	THPO
	Gov Relations	Tribal Government Contact List
	Kyle Fairbanks	District I Representative
	Leon Staples	District III Representative
	Mike Chosa	Director of Communications
	Steve White	District II Representative
	Brandy Tofte	Environmental Director
	Faron Jackson, Sr.	Chairman
	Leonard Fineday	Secretary/Treasurer
Lower Sioux Indian Community	Cheyanne St. John	THPO Director
	Deb Dirlam	Director, Environmental Programs
	Joseph OBrien	President
	Kristi Schoen	Secretary
	Miranda Sam	Senior Executive Assistant
	Nizhoni Smith	Legal Council
	Robert Prescott	Vice-President
	Tamara Desjarlais	Assistant Secretary/Treasurer
	Tyler Prescott	Treasurer
Mille Lacs Band of Ojibwe	Carolyn Beaulieu	District I Representative
	Charles Lippert	Air Quality Specialist
	Michelle Pomerleau	District III Representative
	Jamie Edwards	Senior Advisor of Government Affairs
	Kelly Applegate	Senior Advisor of Government Affairs
	Mike Wilson	THPO
	Luther Sam	THPO Assistant
	Perry Bunting	Director of Environmental Programs
	Sheldon Boyd	Secretary/Treasurer
	Susan Klapel	Executive Director of Natural Resources
	Virgil Wind	Chief Executive
	Raina Killspotted	District II Representative
Minnesota Chippewa Tribe	Joel Smith	Director of Administration
Prairie Island Indian Community	Blake Johnson	Senior Government Relations Specialist
	Constance Campbell	Treasurer
	George Taylor, Jr.	Assistant Secretary/Treasurer
	Grant Johnson	Tribal Council President
	Heather Westra	Tribal Staff Member
	Jessie Seim	General Counsel
	Jody Johnson Puddu	Executive Assistant
	Noah White	THPO
	Ronald Johnson	Tribal Council Vice President

TABLE C2-1

Tribal Contacts

Tribal Nation / Organization	Contact Name	Position
	Valentina Mgeni	Secretary
Red Lake Nation	George Branchaud	THPO
	Darrell Seki, Sr.	Chairman
	Jason Defoe	Executive Administrator
	Joe Plumer	Legal Council
	Samuel Strong	Tribal Secretary
	Vernelle Lussier	Treasurer
Shakopee Mdewakanton Sioux Community	Bill Rudnicki	Tribal Administrator
	Leonard Wabasha	THPO, Director of Cultural Resources
	Cole W. Miller	Chairman
	Steve Albrecht	Operations Administrator
Upper Sioux Community	Camille Tanhoff	Treasurer
	Caralyn Trutna	Vice Chair
	Drew Brockman	Tribal Secretary
	Jeremy Hamilton	Board of Trustees, Member at Large
	Samantha Odegard	THPO
	Kevin Jensvold	Chairman
White Earth Nation	Christie Haverkamp	Director of Compliance
	Eugene Sommers	District II Representative
	Henry Fox	District I Representative
	William Chinana	THPO
	Jacob McArthur	Economic Development Director
	Laura Erickson	District III Representative
	Michael Fairbanks	Chairman
	Mike Laroque	Secretary/Treasurer
	Mike Smith	Director of Facilities
	Nate Mathews	Utility Commission Executive Director
	Laurie York	Executive Director
The Ho-Chunk Nation	William Quackenbush	THPO
Minnesota Department of Natural Resources	LeRoy LaPlante	Tribal Liaison
Minnesota Department of Commerce	Jackie Dionne	Tribal Liaison

TABLE C2-2

Tribal Correspondence

Tribal Nation / Organization	Date	Summary of Correspondence
1854 Treaty Authority	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Minnesota Department of Natural Resources Tribal Liaison	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Minnesota Department of Commerce Tribal Liaison	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Bois Forte Band of Chippewa	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/4/26	Call attempt made; no answer.
	9/11/26	THPO confirmed receipt of the 8/12/26 email and indicated no comments on the Project at this time. THPO indicated they would defer to the Prairie Island Indian Community and Shakopee Mdewakanton Sioux Community THPOs for comments on the Project.
Fond du Lac Band of Lake Superior Chippewa	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/4/26	Called THPO; THPO inquired on the status of surveys. Applicants indicated surveys will not be conducted until later during the process, but a Phase Ia Cultural Resources Literature Review has been prepared, which includes documents from the OSA portal. Inquired on whether the Shakopee Mdewakanton Sioux Community THPO had responded. The Applicants indicated that he had and had asked the Applicants to continue to keep the THPO up to date and was also interested in the results of surveys. FDL THPO asked that if any communities reach out and identify any potential adverse effects from the Project that that Applicants advise the FDL THPO. The FDL THPO recommended that the Applicants consult the Trygg Land Office in Ely, Minnesota and a book about the Red River trails/ox cart routes between St. Paul and Selkirk. The FDL THPO recommended avoidance of villages and old trail networks. The FDL THPO indicated this Project was likely too far south for this information to be applicable. He will reach out if any thing else comes to mind.
	9/4/26	FDL THPO responded via requesting that the Applicants keep the THPO in the loop on historic property identification efforts.
Grand Portage Band of Lake Superior Chippewa	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/3/26	Called the THPO; THPO confirmed receipt of the 8/12/26 216I Project introduction letter and indicated the THPO has no comments or concerns at this time.

TABLE C2-2

Tribal Correspondence

Tribal Nation / Organization	Date	Summary of Correspondence
Leech Lake Band of Ojibwe	12/18/25	Notification email, letter and Notice Area map sent.
	1/2/26	Letter received from THPO determining that Leech Lake Band of Ojibwe does not have any recorded specific properties within the Notice Area (LL THPO No. 25-623-NCRI).
	5/1/26	216I Project introduction letter and route options map sent.
	5/19/26	Letter received from THPO determining that Leech Lake Band of Ojibwe does not have any recorded specific properties within the Notice Area (LL THPO No. 26-230-NCRI). Leech Lake recommended that the Project consult with the Prairie Island Community and the Ho-Chunk Nation.
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Lower Sioux Indian Community	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/4/26	Left voicemail message.
Mille Lacs Band of Ojibwe	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent.
	5/4/26	Mille Lacs Band of Ojibwe Air Quality Specialist responded indicating that as it relates to technical inputs, Mille Lacs would defer to the Dakota Tribes; however, because the Project is within 50 miles of the 1837 Treaty of St. Peters (7 Stat. 536) ceded territory, they are requesting periodic courtesy updates on the Project.
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/3/26	Left voicemail message.
Minnesota Chippewa Tribe	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Prairie Island Indian Community	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/3/26	Left voicemail message.
Red Lake Nation	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/3/26	Left voicemail message.
Shakopee Mdewakanton Sioux Community	12/18/25	Notification email, letter and Notice Area map sent.
	12/19/25	Response acknowledging receipt and requesting ongoing updates.
	5/1/26	Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	8/12/26	Response requesting ongoing updates and information on archaeological work conducted for the Proposed Route when available.
Upper Sioux Community	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/4/26	Left voicemail message.

TABLE C2-2

Tribal Correspondence

Tribal Nation / Organization	Date	Summary of Correspondence
White Earth Nation	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
	9/3/26	Called the THPO; THPO confirmed receipt of the 8/12/26 216I Project introduction letter and indicated the THPO has no comments or concerns at this time.
Apache Tribe of Oklahoma	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Cheyenne and Arapaho Tribes	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Flandreau Santee Sioux Tribe of South Dakota	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent.
	9/8/26	The THPO indicated that the THPO could prepare a report of areas of concern upon implementation of a contract.
	11/2/26	The Applicants responded to the THPO requesting initial feedback on potential concern areas to inform routing.
	11/2/26	The Applicants followed up with a phone call to discuss email; left a voicemail message.
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Iowa Tribe of Kansas and Nebraska	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	5/4/26	The THPO responded acknowledging receipt, providing updated contact information and requesting a .kmz of the Project area of potential of effect. The THPO also indicated that the Iowa Tribe of Kansas and Nebraska would like to be present during survey work and ground disturbing construction activities.
	5/11/26	The Applicants responded providing a .kmz of the current route options that were being considered and provided an overview of the anticipated permitting, survey, and construction schedule. The Applicants committed to providing Project updates as the Project progresses.
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Menominee Indian Tribe of Wisconsin	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Santee Sioux Nation, Nebraska	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)

TABLE C2-2

Tribal Correspondence

Tribal Nation / Organization	Date	Summary of Correspondence
Spirit Lake Tribe, North Dakota	12/18/25	Notification email, letter and Notice Area map sent. (No response.)
	5/1/26	216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)
Ho-Chunk Nation	5/30/26	Based on recommendation from Leech Lake, sent 216I Project introduction letter and route options map sent. (No response.)
	8/12/26	216I Project introduction letter and Proposed Route map sent. (No response.)

Project Letters

The following Project letters and associated maps were submitted to the Tribes identified on Table C2-2.

December 18, 2025

xxxx

Subject: Development of Gopher to Badger Link Transmission Project

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (together, the Applicants) are proposing the Gopher to Badger Link 765-kilovolt (kV) Transmission Project (Project). The Project extends from an existing substation near Pine Island, Minnesota, to the Minnesota/Wisconsin border along the Mississippi River in Houston County, Minnesota. Xcel Energy is developing the first segment of the Project between North Rochester, Minnesota, and Marion, Minnesota. Dairyland is developing the remaining segment between Marion, Minnesota, and the Minnesota-Wisconsin border, which will be a double-circuit 765-/161-kV transmission line (see enclosed Project Area Map). This letter provides information about the Project in Minnesota and the state of Minnesota's permitting process.

We are initiating outreach to briefly introduce the proposed Project at a very early stage of the development process and invite you to an ongoing dialogue as the Project proceeds through the development process.

Project Description

The Project includes:

- A single-circuit 765-kV high voltage transmission line between the existing North Rochester Substation[1] and a point near Marion, Minnesota;
- A 765-kV/161-kV double-circuit high voltage transmission line from near Marion, Minnesota, to the Wisconsin border; and
- A new three-circuit breaker 161 kV switching station in Houston County, Minnesota; a specific location has not yet been identified.

Project Need

The Project is part of the Midcontinent Independent System Operator, Inc.'s (MISO) Long Range Transmission Planning (LRTP) Tranche 2.1 set of transmission line projects, and is needed to maintain system reliability amid fundamental changes in demand for electricity and the type and amount of generation interconnected to the grid within the MISO footprint. The Project in combination with the other Tranche 2.1 projects will create a backbone connection in Minnesota that will ultimately be interconnected with the existing 765-kV network in the eastern United States. This network will make Minnesota's connection to the broader

[1] The existing North Rochester Substation will be expanded to accommodate 765-kV facilities as part of the PowerOn Midwest Project and will be part of a separate Certificate of Need Application.

Midwest and eastern United States more robust and resilient, enabling Minnesota and the region to meet electrical demand in a more reliable and cost-effective manner.

Regulatory Process

The Project requires two types of approvals from the Minnesota Public Utilities Commission (MPUC or Commission): a Certificate of Need and a Route Permit. The Participants will submit a Certificate of Need Application for the Project to the Commission in February 2026. Separately, Applicants will also submit a Route Permit application to the Commission later in 2026. The Project cannot be constructed unless the Commission determines that it is needed in the Certificate of Need proceeding. In the Route Permit proceedings, the Commission will decide where the transmission line and other associated facilities will be located.

Stakeholders will have an opportunity to submit comments and participate in the Certificate of Need and Route Permit processes. You can get involved by submitting comments or attending public meetings and hearings. Please keep in mind that "need" issues should be raised in the Certificate of Need process, and issues concerning the location of the transmission line should be raised during the forthcoming Route Permit process.

Prior to submitting a Route Permit application, the Participants will host open houses in the Project area to solicit feedback from landowners and stakeholders regarding the routes. The Participants will also send Project letters to the Tribes and agencies to invite feedback and meetings to further discuss routing. During the routing process, we would welcome guidance on culturally important locations, Traditional Cultural Properties, landscapes, and practices to consider. We will treat sensitive information with care and can discuss appropriate confidentiality protections.

We anticipate field surveys (environmental, cultural, and engineering) as development of the Project moves forward and are committed to coordinating with all interested Tribes as planning advances. We recognize and respect the enduring cultural, historical, and spiritual connections your Nation maintains with these lands and waters. The scope of jurisdiction and level of analysis under National Environmental Policy Act and a lead agency has not been determined. Xcel Energy and Dairyland do not intend for any discussions between the Tribes and the Applicants to take the place of any government-to-government consultation required under Section 106 of the National Historic Preservation Act.

Additional Information and Mailing Lists

To learn how to subscribe to the Project's Certificate of Need docket and to receive email notifications when information is filed in that docket, please visit www.mn.gov/puc/edockets/how-to/. To subscribe to this docket, follow those instructions and enter Docket Number 25-121. A docket number for the route permit has not yet been assigned.

To be placed on the Project Certificate of Need mailing list, email eservice.admin@state.mn.us or call 651-201-2246. You may request to receive notices by email or U.S. Mail. If you have questions about the state regulatory process, you may contact the Minnesota state regulatory staff listed below:

Sam Lobby
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101
651-201-2205
1-800-657-3782
Sam.lobby@state.mn.us

Also, please feel free to contact the Project team with any questions. Questions can be sent to: connect@gophertobadgerlink.com and 612-474-7799. Information regarding the Project is also available at www.gophertobadgerlink.com.

We hope this information has been helpful to you. Please contact Matt Langan with Xcel Energy or Michael Peters with Dairyland (contact information below) if you have an interest in the Project area and would like to be involved in further discussions so that we can answer any questions, provide you additional information, and discuss any concerns you may have about the Project.

Sincerely,

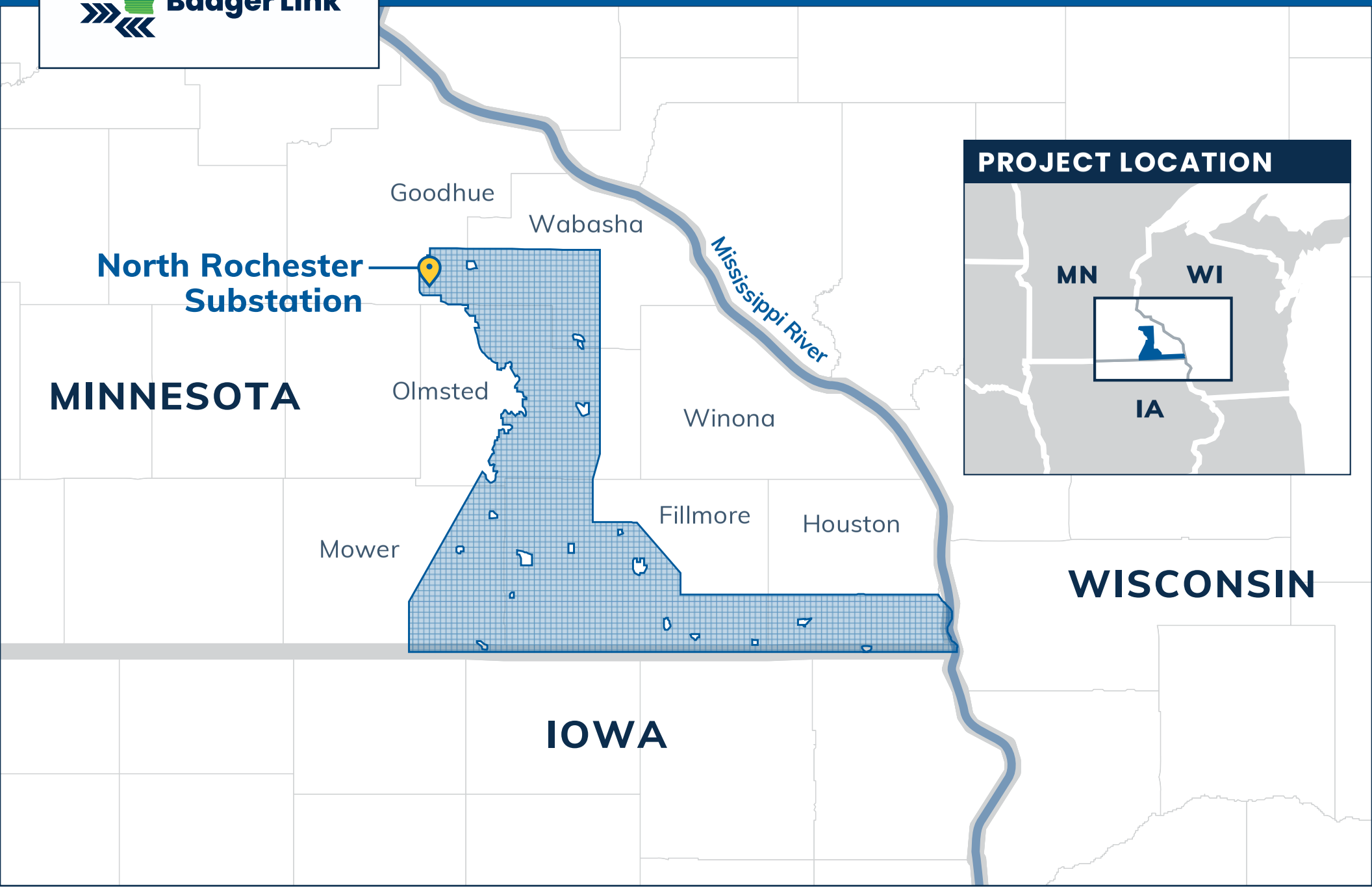
Matt Langan
Xcel Energy
Manager, Regulatory Policy
matthew.a.langan@xcelenergy.com
Phone: 612-330-6954

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@DairylandPower.com
Phone: 608-787-1300

Enclosed: Project Area Map

Gopher to Badger Link

PROJECT AREA MAP



DAIRYLAND POWER COOPERATIVE
A Touchstone Energy® Cooperative

Xcel Energy®

December 2025

May 1, 2026 **VIA Email**

XXXXX

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear XX:

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The proposed Project is an approximately 140-mile-long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota (see enclosed Project Overview Map). This Project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 34-mile-long single circuit 765 kV HVTL between the existing North Rochester Substation and a point near Marion, Minnesota;

- **Segment 2:** Dairyland is developing an approximately 105-mile-long 765 kV/161 kV double circuit HVTL from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

The Project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc. (MISO) Long-Range Transmission Planning Tranche 2.1 Portfolio. The Project includes the Minnesota portions of Tranche 2.1 project number 26. Together with the rest of the Tranche 2.1 Portfolio, the Project is needed to maintain system reliability amid fundamental changes in demand for electricity, as well as the type and amount of generation that is interconnected to the grid within the MISO footprint.

For Segment 1, Xcel Energy would install four-legged, self-supporting steel lattice structures placed 1,200 to 1,400 feet apart. The height of the structures will typically be between 150 to 175 feet. Segment 1 will generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints. On Segment 2, new structures would be installed to allow both the new 765 kV circuit and existing 161 kV line to become double circuited on new structures. These structures would also consist of four-legged, self-supporting lattice structures. The structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be

150 to 199 feet tall. Segment 2 will also generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints.

Two approvals must be obtained from the Minnesota Public Utilities Commission (the Commission) before HVTLs and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants submitted an application for a Joint Certificate of Need on February 6, 2026 and plan to submit an application for a Route Permit for the Project in accordance with Minnesota Statute Chapter 216I in late 2026. As part of this process, the Applicants are undertaking agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process.

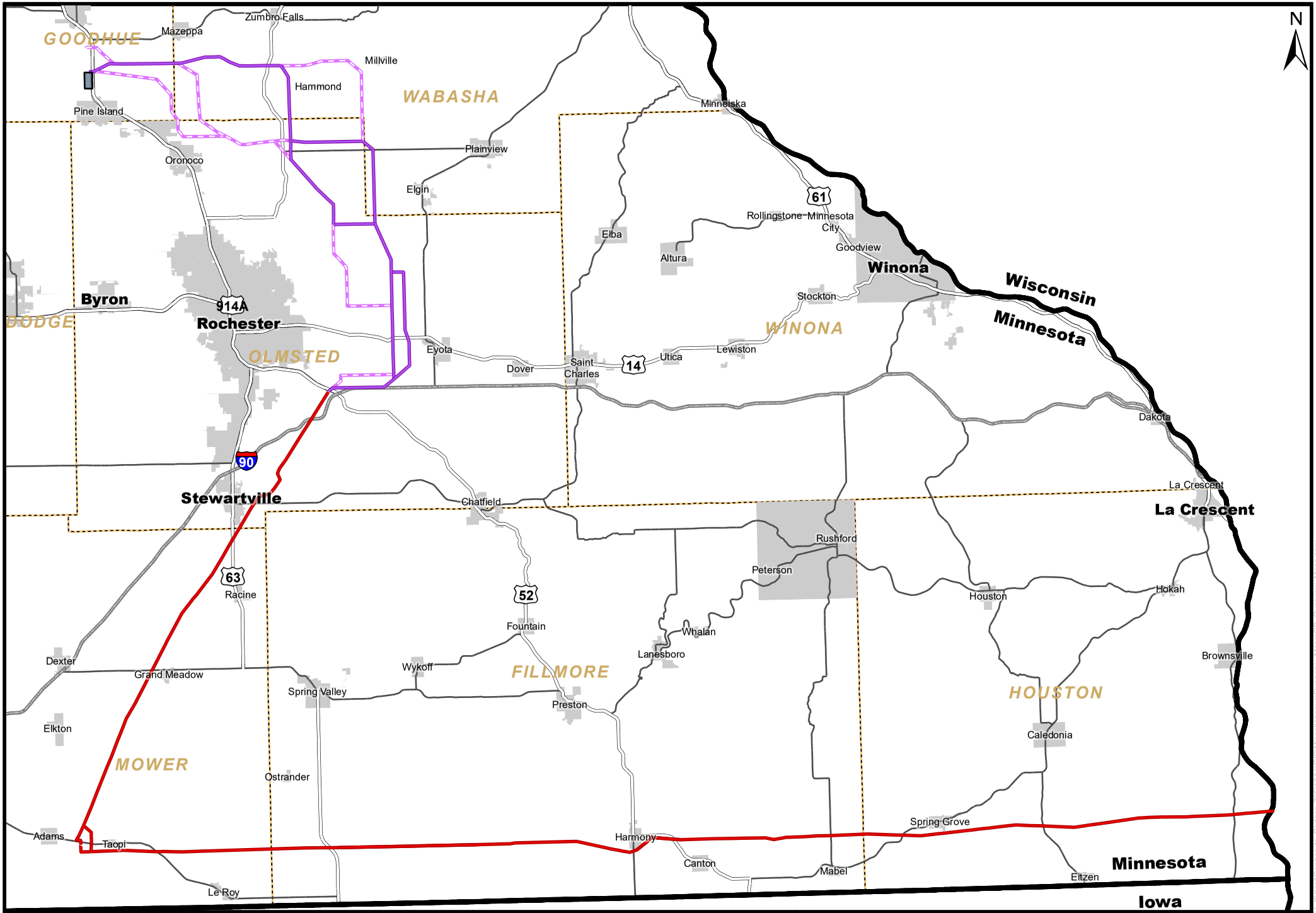
Please let us know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

Enclosure: Project Overview Map



Gopher to Badger Link

Gopher to Badger Link Project

Segment 1 Route Options
Segment 2: MariBell Segment
Previously Considered Routes
Substation Study Area
County Boundary

0 3.5 7 Miles

Date: 4/28/2026

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

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August 12, 2026 **VIA Email**

Name
Title
Department
Agency
Address
Address
Email

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear Name:

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The proposed Project is an approximately 145-mile-long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota (see enclosed Project Overview Map). This Project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 39-mile-long single circuit 765 kV HVTL between the existing North Rochester Substation and a point near Marion, Minnesota;

- **Segment 2:** Dairyland is developing an approximately 105-mile-long 765 kV/161 kV double circuit HVTL from near Marion, Minnesota, to the eastern border of Minnesota. Segment 2 also includes a new three-circuit breaker 161 kV switching station in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

- **Q-9 Reroute:** Rerouting approximately 1.2 miles of Dairyland's existing Q-9 161 kV line to connect to the proposed switching station.

The Project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc. (MISO) Long-Range Transmission Planning Tranche 2.1 Portfolio. The Project includes the Minnesota portions of Tranche 2.1 project number 26. Together with the rest of the Tranche 2.1 Portfolio, the Project is needed to maintain system reliability amid fundamental changes in demand for electricity, as well as the type and amount of generation that is interconnected to the grid within the MISO footprint.

For Segment 1, Xcel Energy would install four-legged, self-supporting steel lattice structures generally placed approximately 1,200 to 1,400 feet apart, on average. The height of the structures will typically be between 150 to 175 feet. Segment 1 will generally require an approximately 250-foot-wide right-of-way.

On Segment 2, new structures would be installed to allow both the new 765 kV circuit and existing 161 kV line to become double circuited on new structures. These structures would also consist of four-legged, self-supporting lattice structures. The structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be 150 to 199 feet tall. Segment 2 will also generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints.

Two approvals must be obtained from the Minnesota Public Utilities Commission (the Commission) before HVTLs and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants submitted an application for a Joint Certificate of Need on February 6, 2026 and plan to submit an application for a Route Permit for the Project in accordance with Minnesota Statute Chapter 216I in fall 2026. As part of this process, the Applicants are undertaking agency, tribal, and public outreach on the Project through letters, meetings, and open houses.

At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential routing constraints. The Applicants recently refined potential Project routes based on outreach conducted to date. The enclosed Project Overview Map identifies the current Proposed Route that the Applicants intend to file with the Route Permit application this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

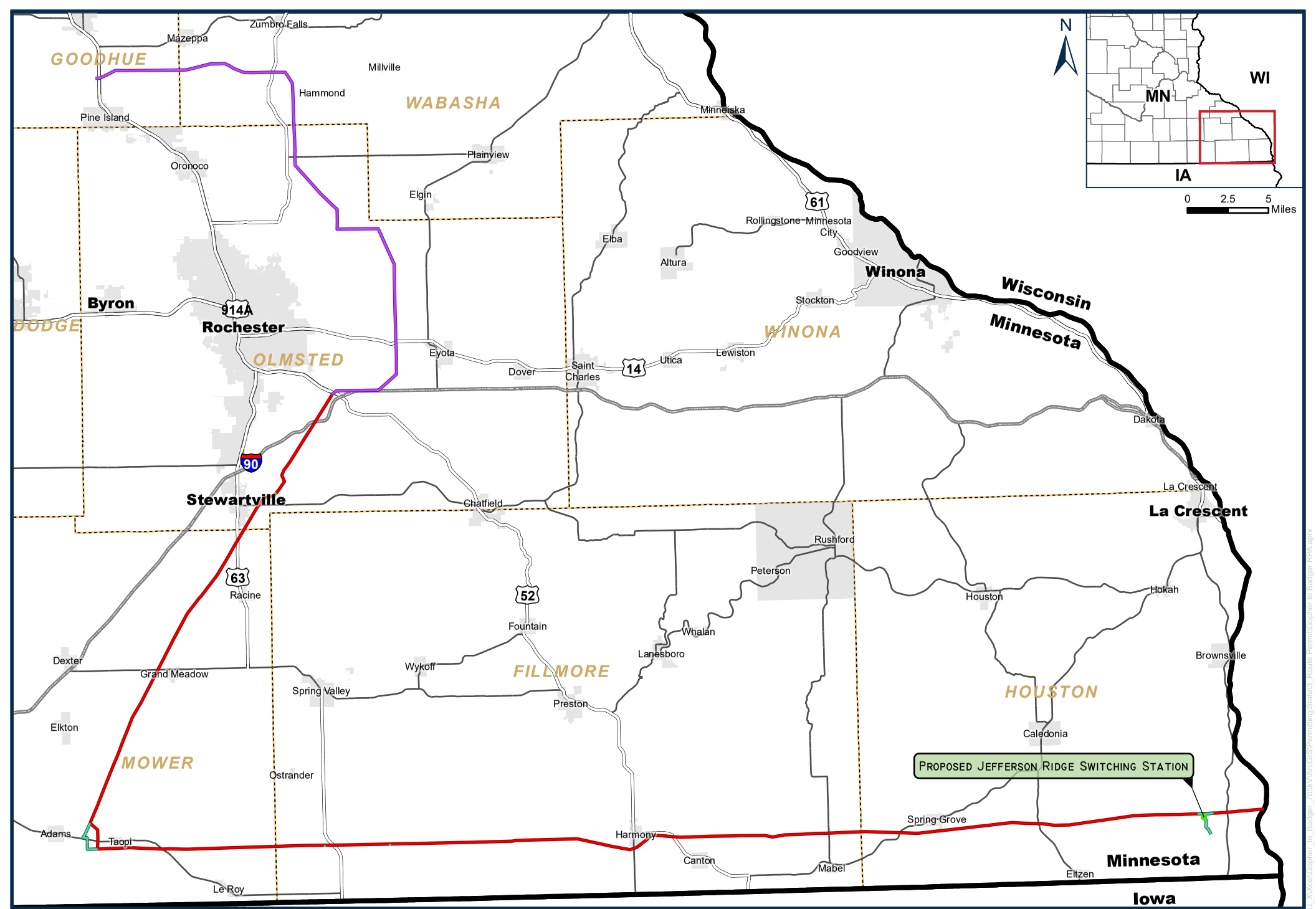
Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

Enclosure: Project Overview Map



Gopher to Badger Link

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Project Overview Map

Date: 8/3/2026

- Proposed Jefferson Ridge Switching Station
- Segment 1
- Segment 2
- Dairyland 161 kV Rebuilds (including Q-9)
- Municipality
- County Boundary

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Fond du Lac Band of Lake Superior Chippewa

From: Evan J Schroeder
To: Kristin Lenz
Cc: Michael Peters; Heine, Ellen L; Minnesota G2BL MN Tribe Agency Correspondence
Subject: EXTERNAL: Re: Gopher to Badger Link Project Update
Date: Friday, September 4, 2026 10:46:29 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Kristin,

Thanks for the phone call just now. Please keep up in the loop on historic property identification efforts.

Best,
Evan

Evan Schroeder | Tribal Historic Preservation Officer
Anishinaabe Izhitwaawin Ganawenjigewin Ozhibii'igewigamig
Resource Management Division | Environmental Program
Nagaajiwanaang Ishkonigan
Fond du Lac Band of Lake Superior Chippewa
Mail: 28 University Rd. Cloquet, MN 55720
Office: (218) 878 - 7129

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 2:57 PM
To: Evan J Schroeder <EvanSchroeder@FDLBand.org>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: Gopher to Badger Link Project Update

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Secured by Check Point

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's

approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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Shakopee Mdewakanton Sioux Community

From: Leonard Wabasha (TO)
To: Kristin Lenz
Cc: Michael Peters; Langan, Matthew A
Subject: EXTERNAL: RE: Development of Gopher to Badger Link Transmission Project, Minnesota
Date: Friday, December 19, 2025 6:56:48 AM
Attachments:

CAUTION: This email originated from outside of Merjent.

Thank you for the opportunity to consult, Please keep us informed...

LEONARD WABASHA
Tribal Historic Preservation Officer • Hocokata Ti
Shakopee Mdewakanton Sioux Community
d: 952.496.6120
shakopeedakota.org
Leonard.Wabasha@shakopeedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Thursday, December 18, 2025 5:19 PM
To: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Langan, Matthew A <Matthew.A.Langan@xcelenergy.com>
Subject: Development of Gopher to Badger Link Transmission Project, Minnesota

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Good afternoon,

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (together, the Applicants) are proposing the Gopher to Badger Link 765-kilovolt (kV) Transmission Project (Project). The Project extends from an existing substation near Pine Island, Minnesota, to the Minnesota/Wisconsin border along the Mississippi River in Houston County, Minnesota. Xcel Energy is developing the first segment of the Project between North Rochester, Minnesota, and Marion, Minnesota. Dairyland is developing the remaining segment between Marion, Minnesota, and the Minnesota-Wisconsin border, which will be a double-circuit 765-/161-kV transmission line (see enclosed Project Area Map). The attached letter provides information about the Project in Minnesota and the state of Minnesota's permitting process.

We are initiating outreach to briefly introduce the proposed Project at a very early stage of the development process and invite you to an ongoing dialogue as the Project proceeds through the development process.

We hope this information is helpful to you. Please contact Matt Langan with Xcel Energy or Michael Peters with Dairyland (contact information below) if you have an interest in the Project area and would like to be involved in further discussions so that we can answer any questions, provide you additional information, and discuss any concerns you may have about the Project.

Matt Langan
Xcel Energy
Manager, Regulatory Policy
matthew.a.langan@xcelenergy.com
Phone: 612-330-6954

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@DairylandPower.com
Phone: 608-787-1300

Kristin Lenz
Senior Project Manager
612.924.3962 direct
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kristin.lenz@merjent.com

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1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
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~~~~~~~~~~~~~~~~~~~~~~~~

From: Leonard Wabasha (TO)
To: Kristin Lenz
Subject: EXTERNAL: RE: Gopher to Badger Link Project Update
Date: Wednesday, August 12, 2026 3:46:22 PM
Attachments:

CAUTION: This email originated from outside of Merjent.

Thank you for the update, please continue to keep us informed and please share any archaeological work concerning any of the proposed routes as that information becomes available, Thank you again and Have a Great Day!

LEONARD WABASHA
Tribal Historic Preservation Officer • Hocokata Ti
Shakopee Mdewakanton Sioux Community
d: 952.496.6120
shakopeedakota.org
Leonard.Wabasha@shakopeedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 3:35 PM
To: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: Gopher to Badger Link Project Update

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Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
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kristin.lenz@merjent.com
merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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~~~~~~~~~~~~~~~~~~~~~~

Leech Lake Band of Ojibwe

LEECH LAKE BAND OF OJIBWE

Tribal Historic Preservation Office

Gina M Lemon, Tribal Historic Preservation Officer
Anita M Cloud, Tribal Historic Preservation Assistant

January 2, 2025 Via Internet

Merjent
Attn: Kristin Lenz, Senior Project Manager
1 Main Street SE – Suite 300
Minneapolis, MN 55414

RE: Development of Gopher to Badger Link Transmission Project.
Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (together, the Applicants) are proposing the Gopher to Badger Link 765-kV Transmission Project. The Project extends from the existing substation near Pine Island, MN, to the MN/WI border along the Mississippi River in Houston Co, MN. Xcel Energy is developing the first segment of the Project between North Rochester, MN, and Marion, MN. Dairyland is developing the remaining segment between Marion, MN, and the MN/WI border, which will be a double-circuit 765-/161-kV transmission line.
Various Co.'s., MN

LL THPO No. 25-623-NCRI

Dear Kristin Lenz,

Thank you for the opportunity to comment on the above referenced project. This has been reviewed pursuant to the responsibilities given to the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992, and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation. After careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any recorded *specific historic properties*, within this area. ** This does not mean there are not any cultural resources present, at this time. **

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff's Office, Office of the State Archaeologist, and the Leech Lake Band of Ojibwe along with other interested parties.

Please note the above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying you of an issue or us (LLBO) of concerns for this specific project, we may reenter into the consultation process.

You may contact me at **(218) 335-2940** if you have questions regarding our review of this project. Please refer to the **LL-THPO Number** as stated above in all correspondence with this project.

Respectfully submitted,

Gina M Lemon
Tribal Historic Preservation Officer

LEECH LAKE BAND OF OJIBWE

Tribal Historic Preservation Office

Gina M Lemon, Tribal Historic Preservation Officer
Anita M Cloud, Tribal Historic Preservation Assistant

May 19, 2026 Via Internet

Merjent
Attn: Kristin Lenz, Senior Project Manager
1 Main Street SE – Suite 300
Minneapolis, MN 55414

RE: Gopher to Badger Link 765 kV High Voltage Transmission Line Project.
MPUC Docket Nos. ET3, E002/CN-25-121 & TL-26-156.

This project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. The proposed project is an approximately 140-mile long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota.

This project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 34-mile long single circuit 765 kV HVLT between the existing North Rochester Substation and a point near Marion, Minnesota.
- **Segment 2:** Dairyland is developing an approximately 105-mile long 765 kV double circuit HVTL from near Marion, Minnesota, to the Wisconsin border. Segment 2 also includes a new three-circuit breaker 161 kV switching station at a location to be identified in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

LL THPO No. 26-230-NCRI

Dear Kristin Lenz,

Thank you for the opportunity to comment on the above referenced project. This has been reviewed pursuant to the responsibilities given to the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992, and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation. After careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any recorded *specific historic properties*, within this area. ** This does not mean there are not any cultural resources present, at this time. **

***Leech Lake Band of Ojibwe recommends that Merjent consults with the Prairie Island Community and the Ho-Chunk Nation.

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff's Office, Office of the State Archaeologist, and the Leech Lake Band of Ojibwe along with other interested parties.

Please note the above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying you of an issue or us (LLBO) of concerns for this specific project, we may reenter into the consultation process.

LEECH LAKE BAND OF OJIBWE

Tribal Historic Preservation Office

Gina M Lemon, Tribal Historic Preservation Officer
Anita M Cloud, Tribal Historic Preservation Assistant

You may contact me at **(218) 335-2940** if you have questions regarding our review of this project. Please refer to the **LL-THPO Number** as stated above in all correspondence with this project.

Respectfully submitted,

Gina M Lemon
Tribal Historic Preservation Officer

Mille Lacs Band of Ojibwe

From:	Kristin Lenz
To:	Charlie Lippert; Virgil Wind
Cc:	Michael Peters; Heine, Ellen L; Carolyn Beaulieu; Harry Davis; Jamie Edwards; Kelly Applegate; Perry Bunting; Sheldon Boyd; Susan Klapel; Wendy Merrill
Subject:	RE: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options
Date:	Monday, May 4, 2026 10:16:00 AM
Attachments:	

Good morning Charlie,

Thank you for your response. Yes, we can provide periodic updates on the Project. Additional information is also available on the Project website here: https://gophertobadgerlink.com/

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

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1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Charlie Lippert <Charlie.Lippert@millelacsband.com>
Sent: Monday, May 4, 2026 8:26 AM
To: Kristin Lenz <kristin.lenz@merjent.com>; Virgil Wind <Virgil.Wind@millelacsband.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Carolyn Beaulieu <Carolyn.Beaulieu@millelacsband.com>; Harry Davis <Harry.Davis@millelacsband.com>; Jamie Edwards <Jamie.Edwards@millelacsband.com>; Kelly Applegate <Kelly.Applegate@millelacsband.com>; Perry Bunting <Perry.Bunting@millelacsband.com>; Sheldon Boyd <Sheldon.Boyd@millelacsband.com>; Susan Klapel <Susan.Klapel@millelacsband.com>; Wendy Merrill <Wendy.Merrill@millelacsband.com>
Subject: EXTERNAL: RE: Gopher to Badger Link Project Introduction - Route Options

CAUTION: This email originated from outside of Merjent.

Boozhoo Kristin.

Miigwech for the notification for the Gopher to Badger Link 765kV High Voltage Transmission Line Project (MPUC Docket Numbers ET3, E002/CN-25-121 and TL-26-156).

When it comes to technical inputs, we defer to the Dakota Tribes that are more local to the project area. As for any consultation regarding the project, I defer that to our elected and duly appointed

officials of the Mille Lacs Band of Ojibwe.

However, Segment 1 of the project is within 50-miles of our 1837 Treaty of St. Peters (7 Stat. 536) ceded territory, so I would appreciate a periodic courtesy update on the project, just to that I am aware of the situation that may potentially impact our Treaty ceded territory.

Niin sa
Charlie L.



From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: May 1, 2026 5:40 PM
To: Virgil Wind <Virgil.Wind@millelacsband.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Charlie Lippert <Charlie.Lippert@millelacsband.com>; Carolyn Beaulieu <Carolyn.Beaulieu@millelacsband.com>; Harry Davis <Harry.Davis@millelacsband.com>; Jamie Edwards <Jamie.Edwards@millelacsband.com>; Kelly Applegate <Kelly.Applegate@millelacsband.com>; Perry Bunting <Perry.Bunting@millelacsband.com>; Sheldon Boyd <Sheldon.Boyd@millelacsband.com>; Susan Klapel <Susan.Klapel@millelacsband.com>; Wendy Merrill <Wendy.Merrill@millelacsband.com>
Subject: Gopher to Badger Link Project Introduction - Route Options

Some people who received this message don't often get email from kristin.lenz@merjent.com. Learn why this is important

Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.

At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting,

please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com



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Flandreau Santee Sioux Tribe of South Dakota

From: Kristin Lenz
To: "Sara Childers"
Cc: Michael Peters; Heine, Ellen L
Subject: RE: Gopher to Badger Link Project Update
Date: Monday, November 2, 2026 9:01:00 AM
Attachments: image001.png
image002.png
image003.png

Good morning Sara,

Thank you for your response and for your interest in the Project. Your input is important to us, and we appreciate your willingness to share your areas of concern. As noted in our letter we are reaching out to Tribes to find out if there is any information about the proposed Project study area that should be included in our application to the Minnesota Public Utilities Commission (MPUC). We are very early in the route permit process and at this time we are not looking for an in-depth consultant level review, but look forward to hearing more about your Project-specific concerns as we proceed through the MPUC process. We have also reached out to the 11 Minnesota Tribes for their input on the Project and will continue coordination with interested Tribes as the process moves forward. If you have any Project-specific concerns about the Gopher to Badger Link Project in southeast Minnesota we would appreciate hearing from you about those.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
612.924.3962 direct
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kristin.lenz@merjent.com

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From: Sara Childers <sara.childers@fsst-nsn.gov>
Sent: Tuesday, September 8, 2026 2:19 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Subject: EXTERNAL: Re: [EXT] Gopher to Badger Link Project Update

CAUTION: This email originated from outside of Merjent.

Hello,
I am not sure if anyone got back to you yet on our areas of concern through your proposed route.

We would be happy to engage with you on this project. I am enclosing our service fees and our W9. We will write up a report of our areas of concern ASAP. If you need to draw up a contract with us for us to do that please dont hesitate to send one over.
Thank you,
Sara Childers

At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential routing constraints. The Applicants recently refined potential Project routes based on outreach conducted to date. The enclosed Project Overview Map identifies the current Proposed Route that the Applicants intend to file with the Route Permit application this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sara Childers
Tribal Historic Preservation Assistant
p. 605.997.3891 x1226
Flandreau Santee Sioux Tribe

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From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, August 12, 2026 2:41 PM
To: Garrie Kills-A-Hundred <garrie.killsahundred@fsst-nsn.gov>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; Minnesota G2BL MN Tribe Agency Correspondence <MN-G2BL-Tribe-Agency-Corr@merjent.com>
Subject: [EXT] Gopher to Badger Link Project Update

CAUTION: This message originated from an external source. If you believe this message is malicious in nature, please report it by using the Phish Alert button.

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South

Dakota, Iowa, and Wisconsin.

The Applicants recently refined potential Project routes based on outreach conducted to date. The attached letter and map identify the current Proposed Route that the Applicants intend to file in the Route Permit application to the Minnesota Public Utilities Commission (Commission) this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact Michael Peters or Ellen Heine (copied above). We would be happy to discuss any questions that you may have about the Project.

On behalf of the Applicants,

Kristin Lenz
Senior Project Manager
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763.913.4740 mobile
kristin.lenz@merjent.com

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Iowa Tribes of Kansas and Nebraska

From: Kristin Lenz
To: Minnesota G2BL MN Tribe Agency Correspondence
Subject: FW: Gopher to Badger Link Project Introduction - Route Options
Date: Monday, May 11, 2026 10:51:23 AM
Attachments:

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com



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From: Kristin Lenz
Sent: Monday, May 11, 2026 10:51 AM
To: 'Randy Teboe' <rteboe@iowas.org>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: Re: Gopher to Badger Link Project Introduction - Route Options

Good morning Randy,

Thank you for your email and your contact information as the new THPO for the Iowa Tribe of Kansas and Nebraska; we have updated our records. The attached .kmz includes the current route options that are being considered. We are planning to file the Route Permit application with the Minnesota Public Utilities Commission this fall, which will only include one route. We anticipate the Route Permit may be issued Q1 2028. We currently anticipate environmental and cultural field surveys would occur shortly after the Route Permit is issued. We also anticipate that there will be a federal permit lead on this Project, potentially the U.S. Army Corps of Engineers. We will continue to keep you updated and will reach out to coordinate survey efforts as we get closer to the anticipated Route Permit issuance.

Please let us know if you would like any additional information in the interim (e.g., Phase Ia Cultural Resources Literature Review when prepared), and/or if you'd like us to set up a Project introduction meeting.

Thank you!
Kristin

Kristin Lenz
Senior Project Manager
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763.913.4740 mobile
kristin.lenz@merjent.com

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From: Randy Teboe <rteboe@iowas.org>
Sent: Monday, May 4, 2026 12:21 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Michael Peters <Michael.Peters@DairylandPower.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: EXTERNAL: Re: Gopher to Badger Link Project Introduction - Route Options

CAUTION: This email originated from outside of Merjent.

Ms. Lenz,

I received your email and the attachments regarding the Gopher to Badger Link Project. Please be advised that Mr. Lance Foster is no longer with the Iowa Tribe of Kansas and Nebraska. I am Randy Teboe, the current THPO for the Iowa Tribe of Kansas and Nebraska.

I am requesting a KMZ file of the Entire project APE. I would like to have boots on ground during any necessary survey work and for any ground disturbing construction activities.

On Fri, May 1, 2026 at 5:19 PM Kristin Lenz <kristin.lenz@merjent.com> wrote:

> Dairyland Power Cooperative (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are in the process of jointly developing a new 765 kilovolt (kV) high voltage transmission line, referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin. Please find attached a letter and overview map providing additional information about the Project.
>
> At this stage in Project development, the Applicants wanted to make you aware of the Project and to gather any information that you might have that will help them identify potential route options or routing constraints. If you have information that the Applicants should consider in evaluating and developing potential routes for the Project or would like to request a meeting, please contact them using the information provided in the attached letter.

On behalf of Dairyland and Xcel Energy,

Kristin Lenz
Senior Project Manager
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--

Randy Teboe
Tribal Historic Preservation Officer
Iowa Tribe of Kansas and Nebraska
3345 B Thrasher Rd.
White Cloud, KS. 66094
O 785-351-0080
C 785-850-8069

Appendix C-3

Local Government Unit Contacts

TABLE C3-1

Local Government Unit Contacts

Agency	Contact Name	Position/Title
Fillmore County	Mitch Lentz	District 1 Commissioner
	Randy Dahl	District 2 Commissioner
	Larry Hindt	District 3 Commissioner
	Duane Bakke	District 4 Commissioner
	Marc Prestby	District 5 Commissioner
	Bobbie Hillery	County Administrator
Goodhue County	Linda Flanders	District 1 Commissioner
	Brad Anderson	Chair, District 2 Commissioner
	Todd Greseth	District 3 Commissioner
	Jason Majerus	District 4 Commissioner
	Susan Betcher	Vice Chair, District 5 Commissioner
	Scott O. Arneson	County Administrator
Houston County	Cindy Wright	District 1 Commissioner
	Eric Johnson	District 2 Commissioner
	Kurt Zehnder	District 3 Commissioner
	Bob Schuldt	District 4 Commissioner
	Greg Myhre	District 5 Commissioner
	Brent Parker	County Coordinator
Mower County	John Mueller	District 1 Commissioner
	Polly Glynn	District 2 Commissioner
	Jerry Reinartz	District 3 Commissioner
	Dan Sparks	Chair, District 4 Commissioner
	Mike Ankeny	Vice Chair, District 5 Commissioner
	Matthew Verdick	County Administrator
Olmsted County	Laurel Podulke-Smith	District 1 Commissioner
	David Senjem	District 2 Commissioner
	Gregg Wright	District 3 Commissioner
	Brian Mueller	District 4 Commissioner
	Michelle Rossman	District 5 Commissioner
	Bob Hopkins	District 6 Commissioner
	Mark Thein	District 7 Commissioner
	Travis Gransee	County Administrator
Wabasha County	Bob Walkes	District 1 Commissioner
	Rick O. Powers	District 2 Commissioner
	Don Springer	District 3 Commissioner
	Mike Wobbe	District 4 Commissioner
	Cheryl Key	District 5 Commissioner
	Michael Plante	County Administrator
Beaver Township	Susan G Dahl	Clerk
	Justin Q Kennedy	Chair
Bristol Township	Eunice Biel	Clerk

TABLE C3-1

Local Government Unit Contacts

Agency	Contact Name	Position/Title
	Kevin Johnson	Chair
Canton Township	Fay Garness	Clerk
	Mike Munroe	Chair
Clayton Township	Ann Prescott	Clerk
	Andrew Marx	Chair
Eyota Township	Franklin Merchant	Clerk
	Township Board Chair	Chair
Farmington Township	Scott Schwanke	Clerk
	Township Board Chair	Chair
Frankford Township	Diane Hanson	Clerk
	Ron Vogt	Chair
Grand Meadow Township	LuAnn Holst	Clerk
	James Jacobson	Chair
City of Harmony	Alissa Stelpflug	City Administrator/Clerk
	Steve Donney	Mayor
Harmony Township	Anne Koliha	Clerk
	Brandon Koliha	Chair
Haverhill Township	Joe Mahoney	Clerk
	Ben Hain	Chair
High Forest Township	Nathan Svoboda	Clerk
	Township Board Chair	Chair
Jefferson Township	Anne Falken	Clerk
	Township Board Chair	Chair
Le Roy Township	Elizabeth Rice	Clerk
	Tim Freerksen	Chair
Lodi Township	Nancy Lewison	Clerk
	John Kirtz	Chair
Marion Township	Colleen Bjerke	Clerk
	Roger Bjerke	Chair
Mazeppa Township	Kia Hackman	Clerk
	Jay Sanborn	Chair
Newburg Township	Paula Hicks	Clerk
	Scott Hicks	Chair
Pine Island Township	David A. Arndt	Clerk
	Glen Betcher	Chair
Pleasant Grove Township	Stacey Kaldenburg	Clerk
	Township Board Chair	Chair
Racine Township	Brittany Stevens	Clerk
	Bruce Bucknell	Chair
Spring Grove Township	Michael Wiste	Clerk
	Township Board Chair	Chair

TABLE C3-1

Local Government Unit Contacts

Agency	Contact Name	Position/Title
Sumner Township	Marianne L. Hockema	Clerk
	Randy Ness	Chair
Viola Township	Barb Nicklay	Clerk
	Township Board Chair	Chair
Wilmington Township	Melissa Schroeder	Clerk
	Township Board Chair	Chair
Winnebago Township	Joyce Staggemeyer	Clerk
	Township Board Chair	Chair
York Township	Fred Scheevel	Clerk
	Andy Ness	Chair
Zumbro Township	Marcia Dworschak	Clerk
	Ed Jostock	Chair

Project Letters

The following Project letter and associated map were submitted to the LGUs identified on Table C3-1 on August 12, 2026.

August 12, 2026 **VIA Email**

Name
Title
Department
Agency
Address
Address
Email

Re: **Gopher to Badger Link 765 kV High Voltage Transmission Line Project**
MPUC Docket Nos. ET3, E002/CN-25-121 and TL-26-156

Dear Name:

Dairyland Power Cooperative, a cooperative association incorporated under the laws of the State of Wisconsin (Dairyland) and Northern States Power Company, doing business as Xcel Energy (Xcel Energy) (together, the Applicants) are jointly developing a new 765 kilovolt (kV) high voltage transmission line (HVTL), referred to as the Gopher to Badger Link Project (Project). This Project is part of a portfolio of projects that will create a 765 kV path connecting Minnesota with South Dakota, Iowa, and Wisconsin.

The proposed Project is an approximately 145-mile-long electric transmission line between the North Rochester Substation near Pine Island, Minnesota, and the Minnesota/Wisconsin border in Houston County, Minnesota (see enclosed Project Overview Map). This Project consists of two segments:

- **Segment 1:** Xcel Energy is developing an approximately 39-mile-long single circuit 765 kV HVTL between the existing North Rochester Substation and a point near Marion, Minnesota;

- **Segment 2:** Dairyland is developing an approximately 105-mile-long 765 kV/161 kV double circuit HVTL from near Marion, Minnesota, to the eastern border of Minnesota. Segment 2 also includes a new three-circuit breaker 161 kV switching station in Houston County, Minnesota, as well as minor upgrades at existing 161 kV substations to support operation of the new Project facilities.

- **Q-9 Reroute:** Rerouting approximately 1.2 miles of Dairyland's existing Q-9 161 kV line to connect to the proposed switching station.

The Project was studied, reviewed, and approved as part of the Midcontinent Independent System Operator, Inc. (MISO) Long-Range Transmission Planning Tranche 2.1 Portfolio. The Project includes the Minnesota portions of Tranche 2.1 project number 26. Together with the rest of the Tranche 2.1 Portfolio, the Project is needed to maintain system reliability amid fundamental changes in demand for electricity, as well as the type and amount of generation that is interconnected to the grid within the MISO footprint.

For Segment 1, Xcel Energy would install four-legged, self-supporting steel lattice structures generally placed approximately 1,200 to 1,400 feet apart, on average. The height of the structures will typically be between 150 to 175 feet. Segment 1 will generally require an approximately 250-foot-wide right-of-way.

On Segment 2, new structures would be installed to allow both the new 765 kV circuit and existing 161 kV line to become double circuited on new structures. These structures would also consist of four-legged, self-supporting lattice structures. The structures will be placed 1,200 to 1,500 feet apart, on average, and will typically be 150 to 199 feet tall. Segment 2 will also generally require up to an approximately 250-foot-wide right-of-way; however, a wider right-of-way may be required in some locations based on topography or other constraints.

Two approvals must be obtained from the Minnesota Public Utilities Commission (the Commission) before HVTLs and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants submitted an application for a Joint Certificate of Need on February 6, 2026 and plan to submit an application for a Route Permit for the Project in accordance with Minnesota Statute Chapter 216I in fall 2026. As part of this process, the Applicants are undertaking agency, tribal, and public outreach on the Project through letters, meetings, and open houses.

At this stage in Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential routing constraints. The Applicants recently refined potential Project routes based on outreach conducted to date. The enclosed Project Overview Map identifies the current Proposed Route that the Applicants intend to file with the Route Permit application this fall. We appreciate your assistance as we evaluate routing information and work through the Commission's approval process. Future Project updates will be available on the Project website: https://www.gophertobadgerlink.com/.

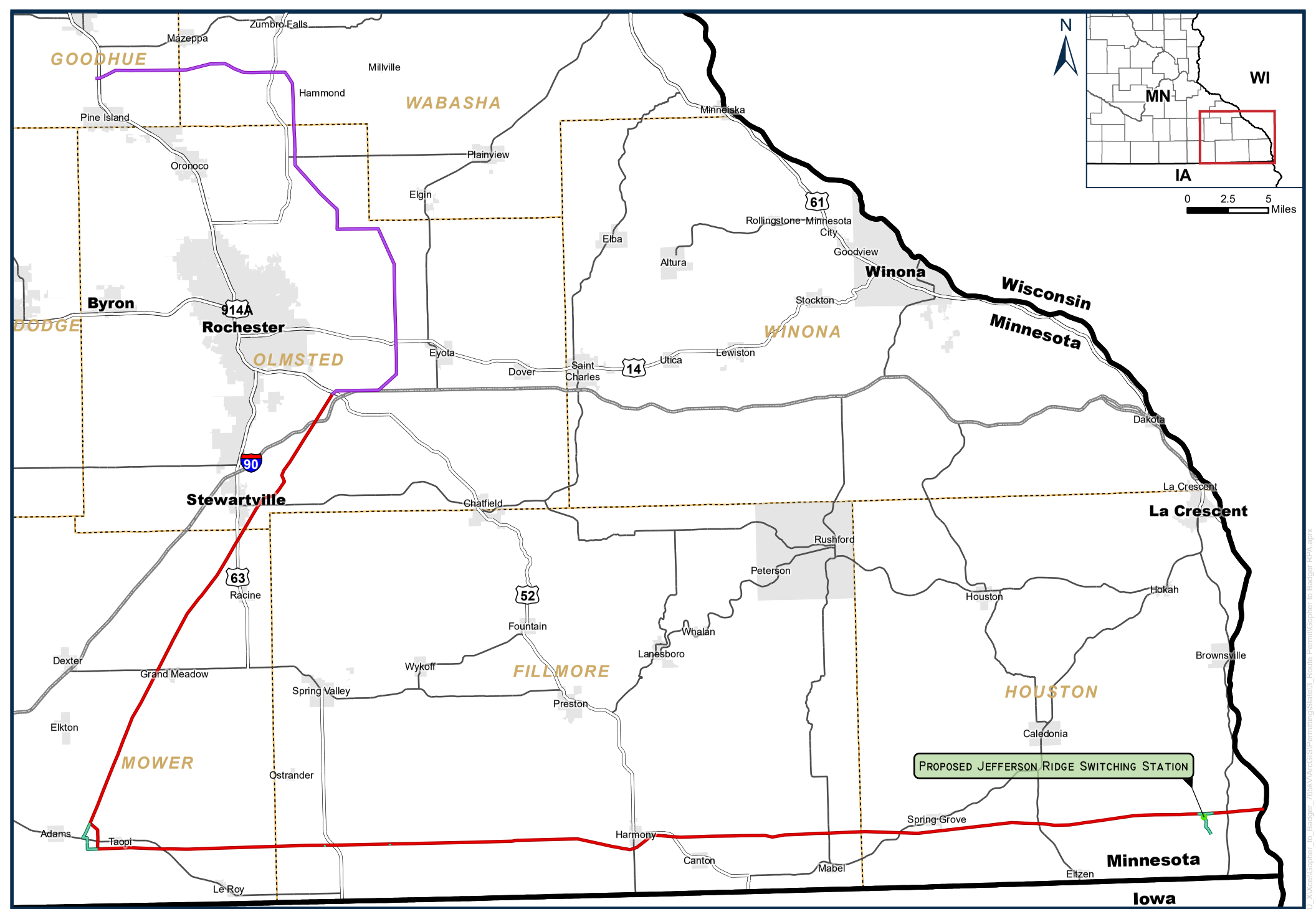
Please let us know if you have information that the Applicants should consider as we are developing the Route Permit Application. If you would like to speak to a Project representative, please contact us using the information below. We would be happy to discuss any questions that you may have about the Project.

Sincerely,

Michael Peters
Dairyland Power Cooperative
Environmental Permitting Lead
Michael.Peters@dairylandpower.com
608-787-1300

Ellen Heine
Xcel Energy
Principal Agent, Siting and Land Rights
Ellen.L.Heine@xcelenergy.com
612-330-6073

Enclosure: Project Overview Map



Gopher to Badger Link

DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

Project Overview Map

Date: 8/3/2026

- Proposed Jefferson Ridge Switching Station
- Segment 1
- Segment 2
- Dairyland 161 kV Rebuilds (including Q-9)
- Municipality
- County Boundary

Document Path: Z:\Clients\G_XX\en\Gopher_to_Badger_765kV\ArcGIS\Permitting\State\3_Route Permit\Gopher to Badger RPA.aprx