

Hamre, John G.

From: Hamre, John G.
Sent: Tuesday, December 21, 2021 3:04 PM
To: Hamre, John G.
Subject: Supplemental Information requested by the PSC for Minnkota's Line 12C Structure Replacement Project - PU-21-378
Attachments: PSC response letter RE initial submittal.pdf; 21-6836 NHPA Johnson.pdf; 21062_Line 12C Tower Replacement Rpt_v3.pdf; Minnkota Line 12C Natural Resources Inventory 211208.pdf
Importance: High

From: Terry Johnson <tjohnson@minnkota.com>
Sent: Wednesday, December 15, 2021 3:02 PM
To: Schock, Victor F. <vschock@nd.gov>
Subject: Supplemental Information requested by the PSC for Minnkota's Line 12C Structure Replacement Project - PU-21-378
Importance: High

******* CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *********

Please find attached the additional proposed project assessment information provided by Minnkota for the aforementioned project as per your requests associated with your Sept. 9th Email, your Sept. 13th letter, and your September 30th Email. As you can see by review of this information, the Phase 1 Field archaeological\Historical survey work indicates that this project does not impact cultural or historic resources or features. This conclusion is also supported by the previous Phase 1a literature review and by the ND SHPO concurrence in their October letter (attached). In addition, Minnkota performed a biological survey as requested. Review of this information from our consultant's report indicates that the project does not impact biological resources.

The sole potential cultural feature previously identified was a very small rock cairn feature near the edge of the corridor boundary associated with structure 643 (nearly 350 feet away). This feature is located significantly uphill from the HVTL ROW, near the crest of a hill adjacent to the landowner's deer stand. The project work could in no way venture anywhere close to this feature. Mitigation (avoidance) would be achieved simply by geomorphology. The archaeologist thinks that leaving it be as opposed to marking it would be the better option so as not to draw attention to it.

Minnkota's opinion is that the cumulative impact assessment information provided more than meets PSC requirements for approval of this project moving forward. However, if you have any questions associated with this information, please feel free to get in touch.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmission, email and any files transmitted with it, may be: (1) subject to the Attorney-Client Privilege, (2) an attorney work product, or (3) strictly confidential under federal or state law. If you are not the intended recipient of this message, you may not use, disclose, print, copy or disseminate this information. If you have

received this transmission in error, notify the sender (only) and delete the message. This message may also be subject to disclosure under the North Dakota Open Records Laws.



October 15, 2021

Mr. Terry Johnson
Minnkota Power Cooperative
5301 32nd Ave S
Grand Forks, ND 58201-3312

ND SHPO Ref.: 21-6836 Class I Literature Review & Field Survey -Request for Concurrence - Proposed Line 12C Structure Replacement Project HVTL structures {#596-598 & 643}, Walsh County, North Dakota

Dear Mr. Johnson,

We reviewed ND SHPO Ref.: 21-6836 Class I Literature Review & Field Survey -Request for Concurrence -Proposed Line 12C Structure Replacement Project HVTL structures {#596-598 & 643}, Walsh County, North Dakota and we concur with a determination of "No Historic Properties Affected" for this project provided it takes place in the location and in the manner described in the documentation and provided all borrow comes from an approved source.

Thank you for the opportunity to review this project. Please include the ND SHPO Reference number listed above in further correspondence for this specific project. If you have any questions please contact Lisa Steckler, Historic Preservation Specialist at (701) 328-3577 or lsteckler@nd.gov

Sincerely,

for William D. Peterson, PhD
State Historic Preservation Officer
(North Dakota)

21-6836

CENTER TO MAPLE RIVER 345kV REPLACEMENT PROJECT
NDPSC Case Number PU-21-378
Natural Resources Inventory Report



Prepared For:
Barr Engineering, Inc.

On Behalf of:
Minnkota Power Cooperative, Inc.



Beaver Creek
ENVIRONMENTAL

1632 Capitol Way | Bismarck, ND 58501 | PH [701] 575.0731 | FX [701] 663.5589

www.bcenv.org | mail: ltoso@bcenv.org

Executive Summary

Minnkota Power Cooperative, Inc. (Minnkota), is proposing to replace four (4) structures on their existing Center to Maple River 345-kV Transmission Line in Stutsman County, North Dakota, referred to as the Project. The North Dakota Public Service Commission (NDPSC) requested that Minnkota provide documentation showing how the Project would comply with exclusion and avoidance areas. This report has been prepared to document compliance with North Dakota Century Code 69-06-08-02 Exclusion area D areas critical to the life stages of threatened or endangered animal or plant species and; Exclusion area E Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged.

While native prairie habitat is present in the area surrounding Structure #643, impacts to threatened or endangered species are not anticipated. The Structure #643 replacement would occur on flat grassland that already contains an existing utility structure. No new disturbance would be required for the access road, which follows an established ranch trail. No new disturbance to native prairie outside of the established utility corridor would be needed for construction of the Project, therefore, direct and indirect impacts are not anticipated to threatened or endangered animal or plant species.

The Project would occur on working agricultural land used for crop production and cattle ranching. The native prairie habitat within the survey corridor is similar to habitats found in the surrounding landscape, and therefore would not be considered rare or unique in this area. The existing utility corridor already coexists in the presence of native prairie habitat, which indicates that the original installation did not cause irreversible damage to this habitat. Therefore, since the Project would occur within habitat that is not unique or rare, and would occur within the existing utility corridor, replacement of an existing structure would not cause irreversible damage to unique or rare habitats.

Table of Contents

Executive Summary	i
Table of Contents	ii
Introduction.....	1
Methods	1
Results.....	3
Discussion.....	9
Conclusion	12
References Cited	13
Table 1. Federally Listed, Proposed, and Candidate Resources with the Action Area.....	1
Table 1. Dakota Skipper Primary Constituent Elements	2

Exhibits

- Exhibit 1. Vicinity Map
- Exhibit 2. Survey Corridor Map

Introduction

Minnkota Power Cooperative, Inc. (Minnkota), is proposing to replace four (4) structures on the existing Center to Maple River 345-kV Transmission Line. The four structures planned for replacement are collectively referred to as the Project. The Project would be in Stutsman County, North Dakota in the following locations:

- Structure #596 - #598 – Section 5, Township (T) 141 North (N), Range (R) 67 West (W).
- Structure #643 – Section 4, T141N, R66W, with a proposed access road in Section 3 and 10, T141N, R66W.

The North Dakota Public Service Commission (NDPSC), the regulatory authority over the Project, requested that Minnkota provide “written reports of field surveys for exclusion and avoidance areas within 700ft wide corridor in areas of planned construction activities”. Exclusion and avoidance areas are documented in ND Century Code 69-06-08-02 Transmission Facility Corridor and Route Criteria. On behalf of Minnkota, Barr Engineering, Inc. contracted Beaver Creek, Inc. to complete natural resources field surveys for the Project to ensure compliance with applicable avoidance and exclusion areas. This report has been prepared to document compliance with ND Century Code 69-06-08-02 exclusion criteria:

- D.) Areas critical to the life stages of threatened or endangered animal or plant species and;
- E.) Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged

Methods

Desktop Review

Prior to field surveys, a desktop review was conducted to determine what potential resources were present in the Project vicinity. Statewide aerial photography, US Geological Survey (USGS) Topographic Maps, and land ownership data were reviewed to determine current and historic land use. A list of federally threatened, endangered, candidate and proposed resources was obtained for Stutsman County from the USFWS Information for Planning and Conservation (IPaC) application (USFWS 2021) (**Table 1**). These data helped guide the field survey efforts.

Table 1. Federally Listed, Proposed, and Candidate Resources with the Action Area

Species/Critical Habitat	Status	Habitat Description and Range in North Dakota
Whooping Crane (<i>Grus americana</i>)	E	Migrates through ND, using wetlands and agricultural land as stopover habitat.
Dakota Skipper (<i>Hesperia dacotae</i>)	T	Typically found in native prairie communities with abundant bunchgrasses and native forb species.
Northern Long-Eared Bat (<i>Myotis septentrionalis</i>)	T	Forested habitats, emergent wetlands, agricultural fields, old fields, pastures.
Piping Plover (<i>Charadrius melodus</i>)	T	Sparsely vegetated sandbars, sand and gravel beaches on islands in the Yellowstone and Missouri Rivers or saline wetlands with exposed beach habitats.
Rufa Red Knot (<i>Calidris canutus rufa</i>)	T	Migratory transient through ND using similar habitat as the piping plover for stopover habitat.
Monarch Butterfly (<i>Danaus plexippus</i>)	C	Use milkweed (<i>Asclepias</i> spp.) as obligate host plant for larvae. Adults require a diversity of blooming nectar sources during breeding and migration.

¹ Status Codes: E=federally listed endangered; T=federally listed threatened; P= federally proposed for listing; C= federal candidate for listing; and CH=designated critical habitat

General Field Survey Methods

Field surveys were conducted by Luke Toso, Botanist/Wildlife Biologist, on October 28, 2021. Rare plant surveys, plant community delineations, and Dakota skipper habitat delineations were completed within an approximately 700-foot-wide survey corridor centered on the proposed structure replacements; An approximately 100-foot-wide corridor was used to evaluate proposed temporary construction access roads (**Figure 2**). Representative digital photographs were taken of the Project area and surroundings to illustrate habitat, topography, and existing development. A complete list of plant species observed was recorded.

Dakota Skipper Habitat Survey Methods

Specific techniques were used to delineate Dakota skipper habitat. Determining the presence of suitable habitat for the Dakota skipper was based primarily on information in the Federal Register. If a plant community contained primary constituent elements for skippers to complete breeding, feeding/foraging, and sheltering behaviors (**Table 1**, 79 FR No 206, p. 63672-63748), it was considered “reproductive habitat” and was delineated using a sub-meter accurate GPS unit. If a community was native prairie with adequate forb diversity or abundance to serve as foraging habitat, but did not have bunchgrasses or soil conditions appropriate for larval development (e.g., western wheatgrass prairie), it was considered “foraging habitat” and was delineated using GPS or digitized from aerial imagery or marked hard copy field maps; foraging habitat included little bluestem/needlegrass communities that had evidence of previous soil disturbance (e.g. reclaimed pipelines/roads). Other grassland communities that would be limited only for use as “dispersal habitat,” (e.g., heavily invaded swales or previously cultivated or disturbed areas dominated by introduced grasses), were documented by taking general plant community notes and recording dominant species composition. Habitat types that were unsuitable for the Dakota skipper (i.e., non-grassland habitats such as woody draws and wetlands) were noted but no detailed plant community information was taken for each area.

The Federal Register defines three primary constituent elements that are essential to conservation of the Dakota skipper (79 FR No 206, p. 63674-63675). While these elements are specific to designated critical habitat, they concisely define the habitat required for the continued survival of this species via the completion of their life cycle. The presence of primary constituent elements was conservatively applied to determine if habitat was suitable for the Dakota skipper; in other words, if habitat was marginal, it was still included as reproductive habitat. **Table 2** lists the primary constituent elements as defined in the Federal Register along with how each definition was modified for habitat delineation in this Project:

Table 2. Dakota Skipper Primary Constituent Elements

Primary Constituent Element	Modification for Habitat Delineation
<p>1) Wet-mesic tallgrass or mixed-grass remnant untilled prairie that occurs on high-quality dry-mesic remnant untilled prairie on rolling terrain consisting of gravelly glacial moraine soil deposits, containing:</p> <ul style="list-style-type: none"> a) A predominance of native grasses and native flowering forbs, b) Glacial soils that provide the soil surface or near surface (between soil surface and 2 cm depth) micro-climate conditions conducive to Dakota skipper larval survival and native prairie vegetation, c) If present, trees or large shrub cover of less than 5 percent of area in dry prairies and less than 25 percent in wet-mesic prairies; and d) If present, nonnative invasive plant species occurring in less than 5 percent of area. 	<p>1b) The Project is within the Missouri Coteau ecoregion, and contains glaciated soils which are assumed suitable for the Dakota skipper.</p> <p>1c and d) Up to 50 percent relative cover of woody species or nonnative invasive species were included within and along the boundary of a polygon if associated with forb or bunchgrass cover of at least 20 percent relative cover. Inclusions of stands or swales of woody species or introduced grasses were included in polygons if the inclusions were within an otherwise contiguous area of high-quality habitat and if openings were present where a butterfly in flight could pass through or across the inclusion.</p>

Primary Constituent Element	Modification for Habitat Delineation
<p>2) Native grasses and native flowering forbs for larval and adult food and shelter, specifically:</p> <p>a) At least one of the following native grasses to provide larval food and shelter sources during Dakota skipper larval stages: Prairie dropseed (<i>Sporobolus heterolepis</i>) or little bluestem (<i>Schizachyrium scoparium</i>); and</p> <p>b) One or more of the following forbs in bloom to provide nectar and water sources during the Dakota skipper flight period: Purple coneflower (<i>Echinacea angustifolia</i>), bluebell bellflower (<i>Campanula rotundifolia</i>), white prairie clover (<i>Dalea candida</i>), upright prairie coneflower (<i>Ratibida columnifera</i>), fleabane (<i>Erigeron</i> spp.), blanketflower (<i>Gaillardia</i> spp.), black-eyed Susan (<i>Rudbeckia hirta</i>), yellow sundrops (<i>Calylophus serrulatus</i>), prairie milkvetch (<i>Astragalus adsurgens</i>), or common gaillardia (<i>Gaillardia aristata</i>).</p>	<p>1a) The presence of needle or porcupine grasses (<i>Hesperostipa</i> sp.) was also considered sufficient for larval food and shelter, as defined by characteristics of “Type B” Dakota skipper habitat in western North Dakota</p>
<p>3) Dispersal grassland habitat that is within 1 km (0.6 mi) of native high-quality remnant prairie (as defined in Primary Constituent Element 1) that connects high-quality wet-mesic to dry tallgrass prairies or moist meadow habitats. Dispersal grassland habitat consists of undeveloped open areas dominated by perennial grassland with limited or no barriers to dispersal including tree or shrub cover less than 25 percent of the area and no row crops such as corn, beans, potatoes, or sunflowers.</p>	<p>3) The desktop analysis provided a context to evaluate dispersal habitat within the broader landscape.</p>

Results

The action area is within the Missouri Coteau ecoregion (Bryce et al. 1996). This ecoregion is characterized as rolling hills dominated by native prairie, with frequent low lying wetland depressions. Agricultural crop land is present on areas of flat to gently rolling topography. Land use is a combination of cattle ranching on grassland habitat and agricultural production (NDGF 2021).

While late in the growing season, it was still possible to precisely identify individual plant species and plant community boundaries. Plant material from the entire growing season was present throughout the survey corridor. Material from spring blooming plants, such as Pasqueflower (*Anemone patens*), was still present, as well as senesced summer and fall blooming plants, such as Canada goldenrod and purple coneflower (*Echinacea purpurea*). For grasses, identifying characteristics were still present despite grazing pressure.

Structure #596-598

Present on generally flat to rolling topography, Structures 596-598 and associated access roads were within mostly cultivated agricultural fields (**Photo 1, 2**). Uncultivated habitats contained low diversity grassland and wetland habitat.

Upland grassland habitat was dominated by smooth brome (*Bromus inermis*) and Kentucky bluegrass (*Poa pratensis*), which are both introduced grass species. Western snowberry (*Symphoricarpos occidentalis*) was also common throughout the area. Other species observed in uplands included Canada thistle (*Cirsium arvense*), Canada goldenrod (*Solidago canadensis*), American licorice (*Glycyrrhiza lepidota*), and false tarragon (*Artemisia dracunculus*).

Wetland habitat was present within the footprint of Structure 597. Dominant species included reed canary grass (*Phalaris arundinacea*) and cattails (*Typha angustifolia*). Curly dock (*Rumex crispus*)

and biennial wormwood (*Artemisia biennis*) were present within the center of the basin. Other species present included field sow thistle (*Sonchus arvensis*), quackgrass (*Elymus repens*), and Canada goldenrod.



Photo 1. View of the typical landscape present within the Structure #596-598 survey corridor. Grassland in the foreground was dominated by smooth brome, while the isolated wetland to the right was dominated by cattails. Agricultural land was the dominant land use of the area, as shown in the background of this image.



Photo 2. View northeast of the emergent wetland habitat present within the footprint of Structure #597. Note the change in color within the wetland, which corresponds to the transition from reed canary grass near the edge, to cattails and curly dock near the wetland center. Smooth brome is shown in the foreground on upland habitat.

Structure #643

Native pasture was present throughout the Structure #643 survey corridor. The majority of the survey corridor was upland grassland habitat, with some wetland habitat on low lying topography (**Photo 3**). Plant species were distributed based on topography, with rolling hillsides containing a higher species diversity than grassland on flat topography.

Flat topography, specifically where the structure replacement would occur, was dominated by western wheatgrass (*Pascopyrum smithii*), Kentucky bluegrass, and blue grama (*Bouteloua gracilis*) (**Photo 4, 6**). Other graminoids present in this community included smooth brome, green needlegrass (*Nassella viridula*), sun sedge (*Carex inops*), threadleaf sedge (*Carex filifolia*), and porcupine grass (*Hesperostipa comata*). Forbs were much less frequent than grasses. Those present included sweet clover (*Melilotus officinalis*), yarrow (*Achillea millefolium*), curly-cup gumweed (*Grindelia squarrosa*), false tarragon, field sage (*Artemisia ludoviciana*), and fringed sage (*Artemisia frigida*).

Hillsides were dominated by native bunchgrasses such as little bluestem (*Schyzacharium scoparium*) and porcupine grass. Side-oats grama (*Bouteloua curtipendula*) and green needlegrass were also commonly observed. Forb species observed on flat topography were also present on hillsides. Forbs unique to the native hillsides included dotted blazingstar (*Liatris punctata*), prairie coneflower (*Ratibida columnifera*), field sagewort (*Artemisia campestris*), Canada goldenrod, Pasqueflower, purple coneflower (*Echinacea purpurea*), and purple prairie clover (*Dalea purpurea*). Some woody encroachment from silverberry (*Elaeagnus commutata*) was present, especially on north facing slopes (**Photo 5, 7**).

On lower slopes of some hillsides, hawthorn (*Crataegus chrysocarpa*) and buffaloberry (*Shepherdia argentea*) thickets were present (**Photo 5, 6, 7**). Western snowberry was abundant along with hawthorn in these areas. The understory contained smooth brome and Kentucky bluegrass, but much of the understory was impacted by cattle.

Emergent wetland habitat was present on low lying topography (**Photo 3**). In addition to the vegetation present in the Structure #596-598 survey corridor, woolly sedge (*Carex pellita*) and prairie cordgrass (*Spartina pectinata*) were also present.



Photo 3. View west of the existing ranch road crossing an emergent wetland. Note the combination of flat topography and rolling hillsides in the background.



Photo 4. View west of the existing ranch trail that would be used to access the structure replacement. View shows the typical topography and vegetation composition of flat topography. Short vegetation structure is a result of heavy grazing.



Photo 5. View east of the existing ranch trail. View shows the rolling hillsides with silverberry encroachment, and hawthorn thickets present on lower slopes.



Photo 6. View west/northwest of Structure 643, which is planned for replacement. View shows that the structure lies on flat topography.



Photo 7. View east of the typical rolling hillsides present within the survey corridor. Note the silverberry encroachment in the foreground, and hawthorn thicket on the lower slopes of the hills. Little bluestem is the ungrazed bunchgrass present in the foreground.

Discussion

The purpose of this report is to provide field data to determine if the Project complies with NDPSC exclusion area criteria. The following discussion focuses on the two exclusion and avoidance areas evaluated by the field surveys for the Project.

D.) Areas critical to the life stages of threatened or endangered animal or plant species

Whooping Crane (*Grus americana*)

The survey corridor is within the migration corridor where 95 percent of confirmed whooping crane sightings have been made (USFWS 2012). Since the Project is within the whooping crane migratory corridor, whooping cranes may occur in the vicinity of the Project during the April 1 – May 15 and/or September 10 – October 31 migration periods. During migration, whooping cranes use stopover habitat opportunistically. In general, whooping cranes avoid rocky substrates and heavily vegetated sites (Armbruster 1990). They typically use shallow marshes with minimal to no emergent zone for roosting, and nearby (within one kilometer) upland cropland and pastures for foraging (Howe 1989). Therefore, the wetland habitat in the survey corridors may be suitable migratory habitat for the whooping crane.

If whooping cranes were to use stopover habitat in the vicinity of the Project, they would do so in the presence of the existing transmission line. The project would replace existing infrastructure, and would not result in new conversion of stopover habitat, or new utility corridor construction. Construction of the Project would not increase disturbance above the existing disturbance regime. Therefore, direct and indirect impacts are not anticipated to this species.

Dakota Skipper (*Hesperia dacotae*)

Native prairie habitat is present within the Structure #643 survey corridor that could be suitable habitat for the Dakota skipper. Native hillsides would be considered reproductive habitat since they contained both native bunchgrasses and forb species that supports both larval development and adult nectar sources. Flat grassland in the survey corridor would be used as dispersal habitat only, since it lacked forbs species. Impacts to the Dakota skipper would occur if disturbance to reproductive habitat occurred during construction of the Project.

While suitable habitat for the Dakota skipper is present in the survey corridor, the proposed Project would occur on flat grassland that already contains an existing utility structure. No new disturbance would be required for the access road, as it would follow an established ranch trail. Therefore, direct impacts would not occur to the Dakota skipper as a result of the Project. Indirect impacts are also not anticipated since construction of the Project would be within an established utility corridor; Dakota skippers that may be present within the survey corridor have existed in the presence of this utility line; since no additional disturbance would occur in reproductive habitat, indirect impacts are not anticipated. Therefore, direct and indirect impacts are not anticipated to this species.

Northern Long-eared Bat (*Myotis septentrionalis*)

The northern long-eared bat has been considered for listing primarily because of white nose syndrome (WNS), an infectious fungus that is responsible for severe population declines (80 FR 17974). In North Dakota, this species is typically known to roost in trees greater than 3 inches in diameter at breast height that have exfoliated bark, cracks, crevices, and/or cavities. Trees with these characteristics are present in the surrounding area, but not within the specific survey corridor.

Direct effects could occur if roosting trees used by northern long-eared bats were removed by construction activities during summer use (April through September). Trees would not be removed for Project construction. All construction of overhead power would occur within the existing

powerline right-of-way. No wooded vegetation would be cleared for Project construction. Therefore, no direct and or indirect effects would occur to the northern long-eared bat as a result of construction of the Project.

Piping Plover (*Charadrius melodus*)

Suitable habitat for piping plovers is characterized as sparsely vegetated channel sandbars and beaches along the Missouri River system and in alkaline wetland basins (67 FR 57638). Emergent wetland habitat in the survey corridor is present, but is heavily vegetated and lacks gravel beaches or saline flats. Therefore, suitable habitat is not present for this species. The nearest potential habitat is the Chase Lake, approximately 10 miles southwest of the Project.

Since suitable habitat is not present, direct and indirect impacts are not anticipated for this species.

Rufa Red Knot (*Calidris canutus rufa*)

The rufa red knot is a rare migratory transient through North Dakota (79 FR 73706). Information is lacking on specific non-coastal stopover habitat for the rufa red knot, but would include wetland habitats with easily digestible food. Wetland habitat is present in the survey corridor that could be suitable stopover habitat for this species.

Similar to the whooping crane, if rufa red knots were to use stopover habitat in the vicinity of the Project, they would do so in the presence of the existing transmission line. The project would replace existing infrastructure, and would not result in new conversion of stopover habitat, or new utility corridor construction. Construction of the Project would not increase disturbance above the existing disturbance regime. Therefore, direct and indirect impacts are not anticipated to this species.

Monarch Butterfly (*Danaus plexippus*)

The monarch butterfly uses milkweed as an obligate host plant for larval development, with adults using a variety of floral resources (85 FR 81813). Therefore, suitable habitat for this species would be considered present if milkweed was available nearby other floral resources. Similar to the Dakota skipper, abundant floral resources are present with native hillsides. While milkweed was not observed in the survey corridor, adults could opportunistically use the native hillsides during dispersal.

While suitable foraging habitat is present within the survey corridor, the proposed Project would occur on flat grassland that lacks forb species. Since suitable foraging habitat would not be impacted by the Project, direct impacts to this species are not anticipated. Foraging adult monarchs using the survey corridor would do so in the presence of the existing utility corridor. Replacement of an existing structure would not increase disturbance above the existing regime. Therefore, direct or indirect impacts are not anticipated for this species.

Threatened and Endangered Species Impacts Summary

Since the Project would be the replacement of existing structures within an established utility corridor, impacts to threatened or endangered species are not anticipated. No new disturbance would occur outside of the utility corridor as result of the Project. If threatened or endangered species were present in the area, they would use habitat in the presence of this existing disturbance regime and no additional impacts would be anticipated. Therefore, the Project would be in compliance with NDPSC citing rules regarding endangered and threatened species.

E.) Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged

The survey corridor for the Project crossed working lands used for agricultural purposes. The survey corridor for Structure #596-598 was mostly agricultural crop land, crossing some introduced grassland and emergent wetland habitat. This habitat would provide minor benefit to animal and plant species due to the low plant diversity and heavy agricultural development in the surrounding area.

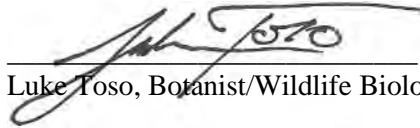
Native prairie habitat used for cattle grazing was present within the survey corridor for Structure #643. In addition to cattle grazing, this habitat would also support a variety of wildlife species due to the abundant native habitat in the surrounding landscape. In context, the survey corridor contains a similar vegetation composition compared to the surrounding landscape, and therefore would not be considered rare or unique in the context of the Missouri Coteau ecoregion.

Since the Project would be the replacement of an existing structure, Project impacts to native prairie would not cause irreversible damage. The existing power line already coexists in the presence of high-quality native prairie habitat, which indicates that the original installation did not cause irreversible damage to this habitat. Therefore, since the Project would occur within habitat that is not unique or rare, and would occur within the existing utility corridor, replacement of an existing structure would not cause irreversible damage to unique or rare habitats and would be in compliance with NDSPC citing rules.

Conclusion

The proposed Project would occur within an established utility corridor, and a new utility corridor would not be needed for the structure replacement. No impacts are anticipated to threatened or endangered species or their habitat. The Project would also not result in irreversible impacts to unique or rare habitats. Based on these findings, the proposed Project is in compliance with NDPSC citing rules.

I certify this report was prepared by me or under my direct supervision. Please contact me directly with questions or comments on this report at ltoso@bcenv.org or (701) 575-0731.



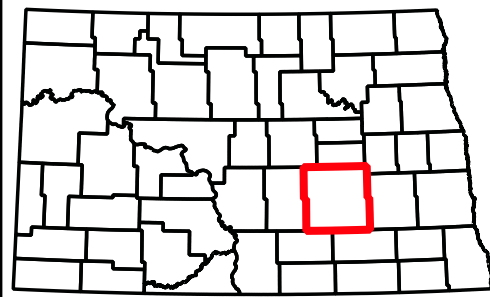
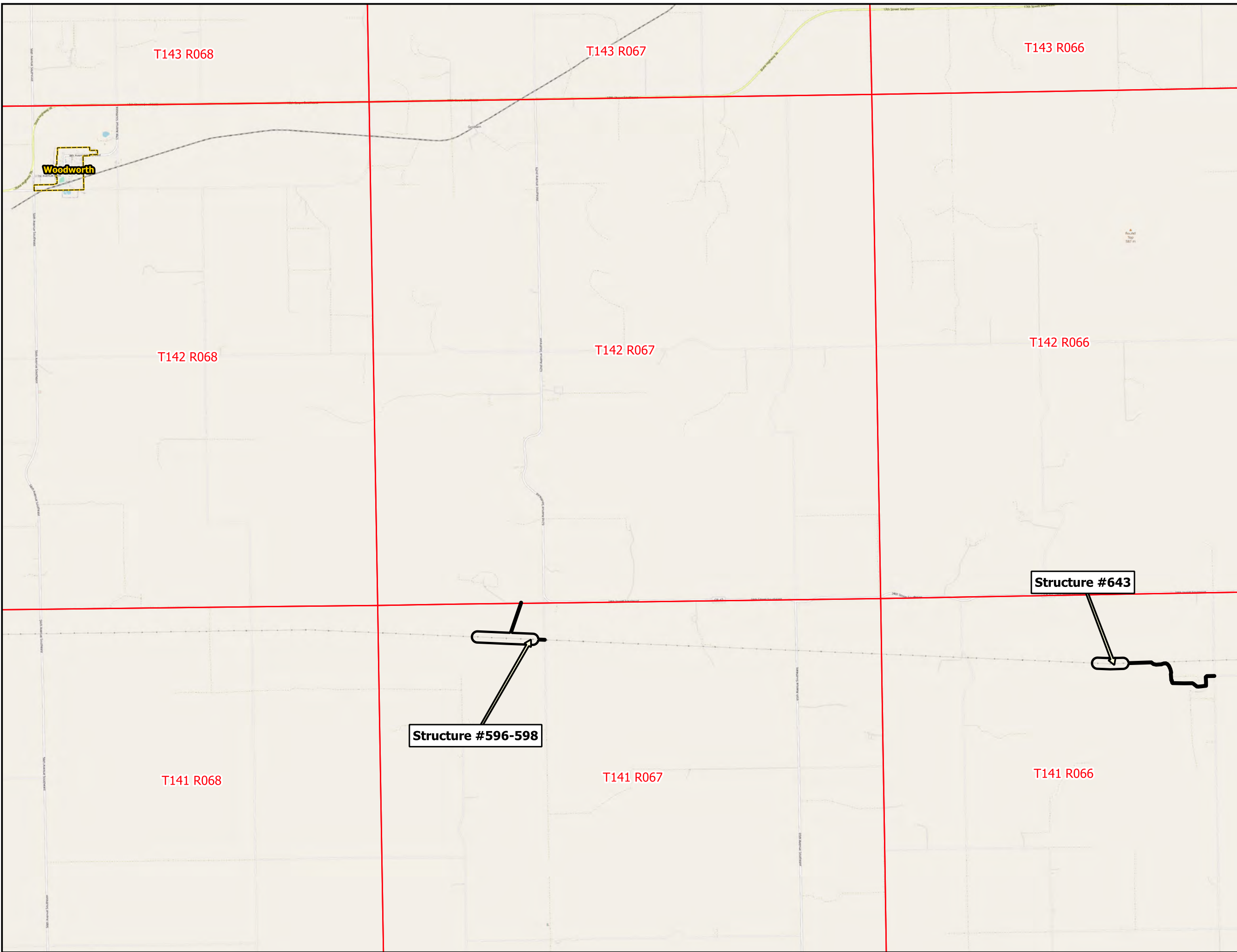
Luke Toso, Botanist/Wildlife Biologist

December 8 2021
Date




References Cited

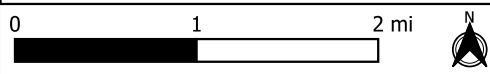
- Armbruster, M. J. 1990. Characterization of habitat used by whooping cranes during migration. U.S. Fish and Wildlife Service., Biol. Rep. 90(4). 16pp.
- Bryce, S.A., Omernik, J.M., Pater, D.A., Ulmer, M., Schaar, J., Freeouf, J., Johnson, R., Kuck, P., and Azevedo, S.H., 1996, Ecoregions of North Dakota and South Dakota, (color poster with map, descriptive text, summary tables, and photographs): Reston, Virginia, U.S. Geological Survey (map scale 1:1,500,000).
- Howe, M. A. 1989. Migration of radio-marked whooping cranes from the Aransas-Wood Buffalo population: Patterns of habitat use, behavior, and survival. U.S. Fish and Wildlife Service Technical Report 21. 33pp.
- North Dakota Game and Fish (NDGF). 2021. Habitat Types: Mixed-Grass Prairie (Missouri Coteau). Available online at: <https://gf.nd.gov/wildlife/habitats/habitats>. Accessed October 2021.
- NAIP (National Agriculture Imagery Program). 2019. North Dakota NAIP 2019 Imagery, 01 January 2019, USDA-FSA Aerial Photography Field Office.
- USDA-NRCS (U. S. Dept. of Agriculture, Natural Resource Conservation Service). 2019. The PLANTS Database (<http://plants.usda.gov>). National Plant Data Team, Greensboro, NC 27401-4901 USA.
- USFWS (US Fish and Wildlife Service). 2012. Whooping Crane (*Grus Americana*) 5-Year Review: Summary and Evaluation. USFWS Aransas National Wildlife Refuge, Austwell, Texas and Corpus Christi Ecological Services Field Office, Texas. Available online at: https://www.fws.gov/southwest/es/Documents/R2ES/Whooping_Crane_5-yr_Review_Feb2012.pdf. Accessed April 2020
- , 2021. Information for Planning and Conservation (IPaC) Trust Resources Report. Project Planning Tool Website: <https://ecos.fws.gov/ipac/>. IPaC v3.0.8. 10 p.

Exhibits



Stutsman County, North Dakota

-  Survey Corridor
-  City Boundary
-  Townships



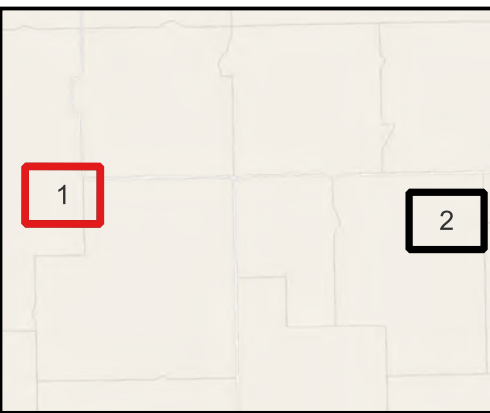
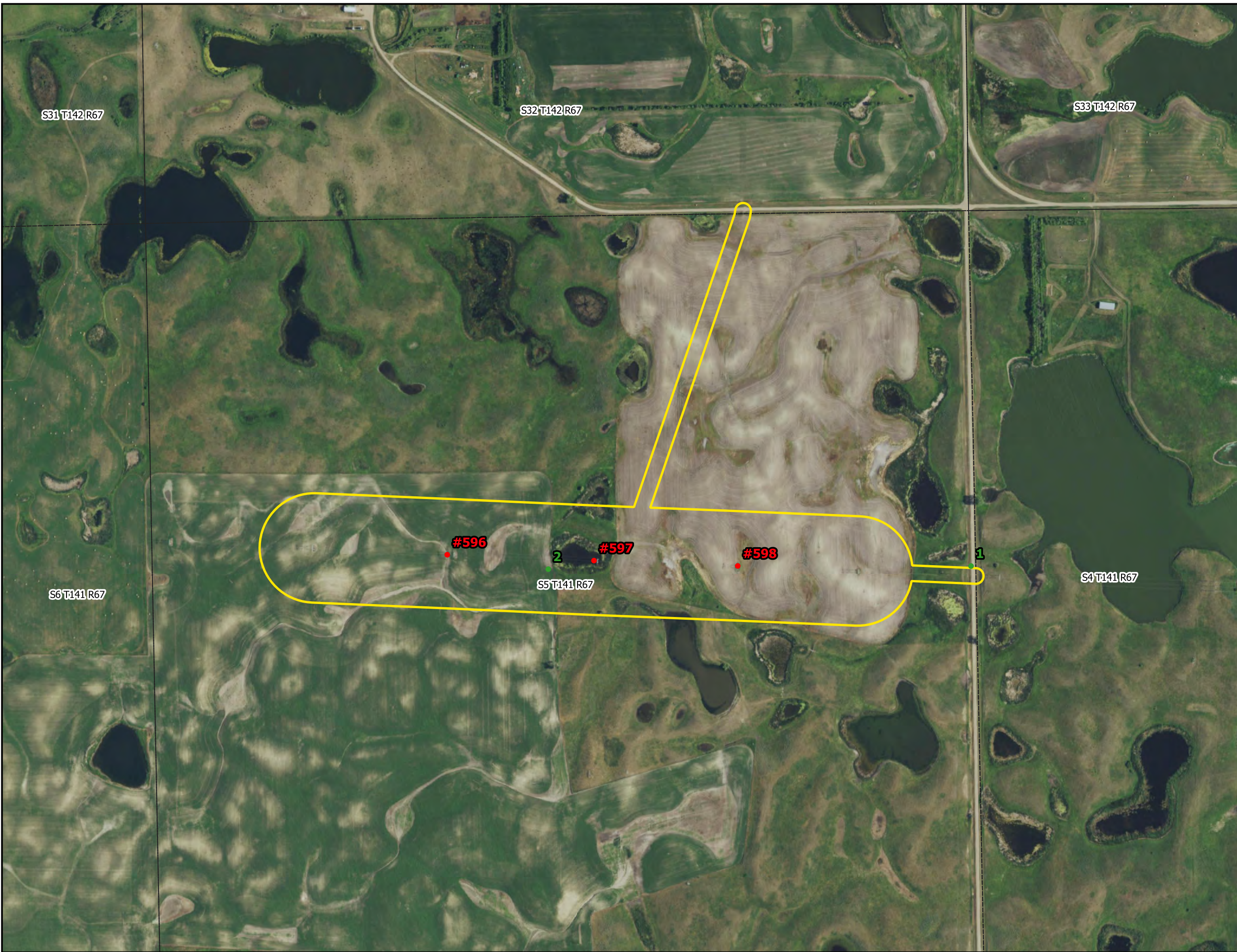
Surveyor: LToso
 Drawn by: AGoblirsch
 Field Date: 10/28/2021
 Map Date: 2021-11-23 08:07:05
 Project Name: Minnkota Line 12C
 Background Imagery: OSM Standard



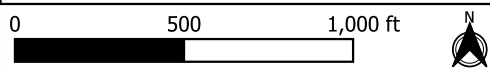
VICINITY MAP

Minnkota Line 12C
Barr Engineering, Inc.
Minnkota, Inc.

Exhibit 1



- Photo Point
- Structure
- DASK Habitat
- Survey Corridor
- Sections



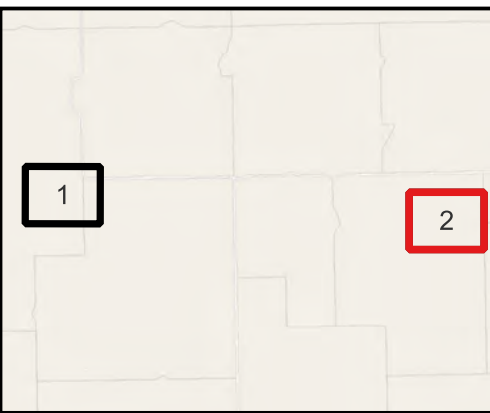
Surveyor: LToso
 Drawn by: AGoblirsch
 Field Date: 10/28/2021
 Map Date: 2021-11-23 08:10:28
 Project Name: Minnkota Line 12C
 Background Imagery: 2020 Aerial Image (NAIP)



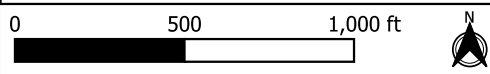
Survey Corridor Map

Minnkota Line 12C
Barr Engineering, Inc.
Minnkota, Inc.

Exhibit 2
Map 1 of 2



- Photo Point
- Structure
- DASK Habitat
- Survey Corridor
- Sections



Surveyor: LToso
 Drawn by: AGoblirsch
 Field Date: 10/28/2021
 Map Date: 2021-11-23 08:10:34
 Project Name: Minnkota Line 12C
 Background Imagery: 2020 Aerial Image (NAIP)



Survey Corridor Map

Minnkota Line 12C
Barr Engineering, Inc.
Minnkota, Inc.

Exhibit 2
Map 2 of 2