

**APPENDIX K**  
**Project Correspondence**

**Public**

**Appendix K**  
**Project Correspondence - Federal, State and Local Agencies**

Jurisdiction	Agency	Department/District/Division	Contact Name	Address	Email	Response to Introductory Letter?
Federal	U.S. Army Corps of Engineers	St. Paul District - Regulatory and Permits	Benjamin Orne	332 Minnesota St., Ste. E1500, St. Paul, MN 55101	<a href="mailto:benjamin.g.orne@usace.army.mil">benjamin.g.orne@usace.army.mil</a>	N
Federal	U.S. Department of Agriculture	Natural Resources Conservation Service	Elizabeth Dawson	430 3rd Street, Suite 250 Farmington, MN 55024	<a href="mailto:elizabeth.dawson@usda.gov">elizabeth.dawson@usda.gov</a>	N
Federal	U.S. Fish and Wildlife Service	Minnesota Ecological Services Field Office	Betsy Galbraith	3815 American Blvd. East, Bloomington, MN 55425	<a href="mailto:betsy_galbraith@fws.gov">betsy_galbraith@fws.gov</a>	Y; IPaC and Dkey
State	Minnesota Board of Soil and Water Resources	Wetland Conservation Act	Dilan Christiansen		<a href="mailto:Dilan.T.Christiansen@state.mn.us">Dilan.T.Christiansen@state.mn.us</a>	Y
Local	Swift County Environmental Department	Water Planning	Scott Collins	1000 Industry Dr., PO Box 207, Benson, MN 56215	<a href="mailto:scott.collins@swiftmn.us">scott.collins@swiftmn.us</a>	N
Local	Swift County Highway Department	Highway Permits	Tyler Baumchen, Engineer	1635 Hoban Avenue; PO Box 241, Benson, MN 56215	<a href="mailto:tyler.baumchen@swiftmn.us">tyler.baumchen@swiftmn.us</a>	N
Local	Swift County Parks, Drainage & Wetlands	Wetland Conservation Act	Kody Fossum	1635 Hoban Avenue, Benson, MN 56201	<a href="mailto:kody.fossum@co.swift.mn.us">kody.fossum@co.swift.mn.us</a>	Y
State	Minnesota Department of Agriculture	Ag Marketing & Development	Stephan Roos	625 Robert Street North, St. Paul, MN 55155-2538	<a href="mailto:stephan.roos@state.mn.us">stephan.roos@state.mn.us</a>	N
State	Minnesota Department of Health	Environmental Health Division - Southwest	Amanda Strommer		<a href="mailto:amanda.strommer@state.mn.us">amanda.strommer@state.mn.us</a>	Y
State	Minnesota Department of Health	Environmental Health Division - Southwest	Yarta Clemens-Billaigbakpu		<a href="mailto:yarta.clemens-billaigbakpu@state.mn.us">yarta.clemens-billaigbakpu@state.mn.us</a>	Y
State	Minnesota Department of Health	Environmental Health Division - Surface Water Protection Program	Derek Richter		<a href="mailto:derek.richter@state.mn.us">derek.richter@state.mn.us</a>	N
State	Minnesota Department of Health	Environmental Health Division - Surface Water Protection Program	Danielle Nielsen		<a href="mailto:danielle.nielsen@state.mn.us">danielle.nielsen@state.mn.us</a>	N
State	Minnesota Department of Natural Resources	Environmental Review Coordinator	Martin Donovan		<a href="mailto:martin.donovan@state.mn.us">martin.donovan@state.mn.us</a>	N
State	Minnesota Department of Natural Resources	Lands & Minerals	Benjamin Schaefer	21371 State Hwy 15, New Ulm, MN 56073-5228	<a href="mailto:benjamin.schaefer@state.mn.us">benjamin.schaefer@state.mn.us</a>	Y
State	Minnesota Department of Natural Resources	Ecological and Water Resources - Environmental Review Program	Haley Byron	117 Rogers Street, Mankato, MN 56001	<a href="mailto:Haley.Byron@state.mn.us">Haley.Byron@state.mn.us</a>	Y
State	Minnesota Department of Natural Resources	Minnesota Endangered Species	Molly Barrett	500 Lafayette Rd., Box 25, St. Paul, MN 55155	<a href="mailto:Molly.Barrett@state.mn.us">Molly.Barrett@state.mn.us</a>	MCE Online Reviewer
State	Minnesota Department of Natural Resources	Water Appropriation - Area Hydrologist; Wetland Conservation Act	Emily Wolf	PO Box 457, 10590 County Road 8 NE, Spicer, MN 55350	<a href="mailto:Emily.Wolf@state.mn.us">Emily.Wolf@state.mn.us</a>	N
State	Minnesota Department of Transportation	Land Management	Stacy Kotch Egstad		<a href="mailto:stacy.kotch@state.mn.us">stacy.kotch@state.mn.us</a>	Y
State	Minnesota Department of Transportation	Wetland Conservation Act - District 4	Gabe Dretsch		<a href="mailto:gabriel.dretsch@state.mn.us">gabriel.dretsch@state.mn.us</a>	N
State	Minnesota Department of Transportation	Wetland Conservation Act - Wetland Program Coordinator	Beth Brown		<a href="mailto:elizabeth.a.brown@state.mn.us">elizabeth.a.brown@state.mn.us</a>	Y
State	Minnesota Indian Affairs Council	Section 106 / MN Cultural Resources Review	Shannon Geshick	161 St. Anthony Ave, Ste. 919, St. Paul, MN 55103	<a href="mailto:shannon.geshick@state.mn.us">shannon.geshick@state.mn.us</a>	N
State	Minnesota Indian Affairs Council	Section 106 / MN Cultural Resources Review	George J. Goggleye Jr.	161 St. Anthony Ave, Ste. 919, St. Paul, MN 55103	<a href="mailto:george.goggleye@state.mn.us">george.goggleye@state.mn.us</a>	N
State	Minnesota State Historic Preservation Office	Section 106 / MN Cultural Resources Review	Kelly Gragg Johnson	Administration Building #203, 50 Sherburne Ave., St. Paul, MN 55155	<a href="mailto:kelly.graggjohnson@state.mn.us">kelly.graggjohnson@state.mn.us</a>	Y; SHPO No. 2025-0092
State	Office of the State Archaeologist	Section 106 / MN Cultural Resources Review	Amanda Gronhovd	328 W. Kellogg Blvd., St. Paul, MN 55102	<a href="mailto:Amanda.Gronhovd@state.mn.us">Amanda.Gronhovd@state.mn.us</a>	N
State	Minnesota Board of Water and Soil Resources	Riparian Easements	Dusty Van Thuyne	520 Lafayette Rd., Box 25, St. Paul, MN 55155	<a href="mailto:dusty.vanthuyne@state.mn.us">dusty.vanthuyne@state.mn.us</a>	Y

Notes: The agencies and Tribal points of contacts in this table received a Project introductory letter (example letter included herein). Additional correspondence from these points of contact, as noted in the "Response to Introductory Letter?" column, is also provided in this appendix.

**Appendix K**  
Project Correspondence - Tribal Nations

Tribal Name	First Name	Last Name	Title	Street Address	City	State	Zip Code	Email	URL	Response to Introductory Letter?
Bois Forte Band of Chippewa	Catherine	Chavers	Chairwoman	5344 Lakeshore Drive	Nett Lake	MN	55772	cchavers@boisforte-nsn.gov	<a href="http://www.boisforte.com">www.boisforte.com</a>	N
Bois Forte Band of Chippewa	Jaylen	Strong	THPO	1500 Bois Forte Road	Tower	MN	55790	jaylen.strong@boisforte-nsn.gov		N
Fond du Lac Band of the Lake Superior Chippewa	Bruce	Savage	Chairman	1720 Big Lake Rd	Cloquet	MN	55720	brucesavage@fdlband.org	<a href="https://fdlband.org/">https://fdlband.org/</a>	N
Fond du Lac Band of the Lake Superior Chippewa	Evan	Schroeder	THPO	1720 Big Lake Rd	Cloquet	MN	55720	Evan.Schroeder@fdlband.org		N
Grand Portage Band of Lake Superior Chippewa	Robert "Bobby"	Deschampe	Chairman	PO Box 428	Grand Portage	MN	55605	robertdeschampe@grandportage.com	<a href="http://www.grandportageband.com">www.grandportageband.com</a>	N
Grand Portage Band of Lake Superior Chippewa	Rob	Hull	THPO	PO Box 428	Grand Portage	MN	55605	thpo@grandportage.com		N
Leech Lake Band of Ojibwe	Faron	Jackson	Chairman	190 Sailstar Drive NE	Cass Lake	MN	56633	Faron.Jackson@llojibwe.net	<a href="http://www.llojibwe.org">www.llojibwe.org</a>	N
Leech Lake Band of Ojibwe	Gina	Lemon	THPO	190 Sailstar Drive NE	Cass Lake	MN	56633	gina.lemon@llojibwe.net	<a href="http://www.llojibwe.org">www.llojibwe.org</a>	Y
Leech Lake Band of Ojibwe	Brandy	Toft	Environmental Director	190 Sailstar Drive NE	Cass Lake	MN	56633	Brandy.toft@llojibwe.net		N
Leech Lake Band of Ojibwe	Eugene	Strowbridge	Sustainability Coordinator	190 Sailstar Drive NE	Cass Lake	MN	56633	Eugene.Strowbridge@llojibwe.net		N
Lower Sioux Indian Community in the State of Minnesota	Robert	Larsen	President	39527 Reservation Hwy. 1, PO Box 308	Morton	MN	56270	robert.larsen@lowersioux.com	<a href="http://www.lowersioux.com">www.lowersioux.com</a>	N
Lower Sioux Indian Community in the State of Minnesota	Cheyanne	St. John	THPO	39527 Reservation Hwy. 1, PO Box 308	Morton	MN	56270	cheyanne.stjohn@lowersioux.com		N
Mille Lacs Band of Ojibwe	Virgil	Wind	Chief Executive	43408 Oodena Drive	Onamia	MN	56359	virgil.wind@millelacsband.com	<a href="http://www.millelacsband.com">www.millelacsband.com</a>	N
Mille Lacs Band of Ojibwe	Charles	Lippert	Air Quality Specialist	43408 Oodena Drive	Onamia	MN	56359	Charlie.Lippert@millelacsband.com		N
Mille Lacs Band of Ojibwe	Perry	Bunting	Director of Environmental Programs	43408 Oodena Drive	Onamia	MN	56359	perry.bunting@millelacsband.com		N
Mille Lacs Band of Ojibwe	Mike	Wilson	THPO	43408 Oodena Drive	Onamia	MN	56359	Mike.Wilson@millelacsband.com		N
Mille Lacs Band of Ojibwe	Susan	Klapel	Executive Director of Natural Resources	43408 Oodena Drive	Onamia	MN	56359	Susan.Klapel@millelacsband.com		N
Prairie Island Indian Community	Grant	Johnson	President	5636 Sturgeon Lake Road	Welch	MN	55089	grant.johnson@piic.org	<a href="http://prairieisland.org/">http://prairieisland.org/</a>	N
Prairie Island Indian Community	Noah	White	THPO	5636 Sturgeon Lake Road	Welch	MN	55089	noah.white@piic.org		N
Red Lake Band of Chippewa Indians	Darrell	Seki	Chairman	15484 Migizi Drive	Red Lake	MN	56671	dseki@redlakenation.org	<a href="http://www.redlakenation.org">www.redlakenation.org</a>	N
Red Lake Band of Chippewa Indians	Kade	Ferris	THPO	PO Box 274	Red Lake	MN	56671	kade.ferris@redlakenation.org		N
Shakopee Mdewakanton Sioux Community	Cole	Miller	Chairman	2330 Sioux Trail NW	Prior Lake	MN	55372	cole.miller@shakopeedakota.org	<a href="http://www.shakopeedakota.org/">www.shakopeedakota.org/</a>	N
Shakopee Mdewakanton Sioux Community	Leonard	Wabasha	THPO	2330 Sioux Trail NW	Prior Lake	MN	55372	leonard.wabasha@shakopeedakota.org		Y
Upper Sioux Community	Kevin	Jensvold	Chairman	5722 Travers Lane, PO Box 147	Granite Falls	MN	56241	kevinj@uppersiouxcommunity-nsn.gov	<a href="http://www.uppersiouxcommunity-nsn.gov">www.uppersiouxcommunity-nsn.gov</a>	N
Upper Sioux Community	Samantha	Odegard	THPO	5722 Travers Lane, PO Box 147	Granite Falls	MN	56241	samanthao@uppersiouxcommunity-nsn.gov		Y
White Earth Nation	Michael	Fairbanks	Chairman	35500 Eagle View Road	Ogema	MN	56569	Michael.Fairbanks@whiteearth-nsn.gov	<a href="http://www.whiteearth.com">www.whiteearth.com</a>	N
White Earth Nation	Jaime	Arsenault	THPO and NAGPRA Representative	PO Box 418	White Earth	MN	56591	Jaime.Arsenault@whiteearth-nsn.gov		N
Minnesota Chippewa Tribe	Michael	LaRoque	President	P.O. Box 217	Cass Lake	MN	56633	gfrazer@mnchippewatribe.org	<a href="http://www.mnchippewatribe.org/">www.mnchippewatribe.org/</a>	N
Minnesota Chippewa Tribe	Rob	Hull	THPO	P.O. Box 428	Grand Portage	MN	55605	thpo@grandportage.com		N

Notes: The agencies and Tribal points of contacts in this table received a Project introductory letter (example letter included herein). Additional correspondence from these points of contact, as noted in the "Response to Introductory Letter?" column, is also provided in this appendix.



12300 Elm Creek Boulevard  
Maple Grove, Minnesota 55369-4718  
763-445-5000  
greatriverenergy.com

September 5, 2024

Name  
Title  
Agency  
Address  
Address  
Email Address

**Subject: Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and the City of Benson Appleton to Benson 115-kV Transmission Line Project in Swift County, Minnesota**

Name:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

As shown in the enclosed Figure, the Applicants propose to upgrade approximately 18 miles of existing 41.6-kV transmission lines, reconductor approximately 1 mile of an existing 115-kV transmission line, and construct approximately 8 miles of new 115-kV transmission line connecting the following substations: Appleton, Shible Lake, Moyer, Danvers, and Benson. Additionally, a 1.7-mile 115-kV transmission line would be installed from Great River Energy's existing AG-BK 115-kV line southwest of the City of Benson to the Benson Municipal Substation. As part of this construction, 0.7 mile of the existing AG-BK line would be removed. The Project will also include construction of new Appleton transmission and distribution substations, a new Moyer Substation or modifications to the existing Moyer Substation, and modifications to the following existing substations: Shible Lake; Danvers; and Benson Municipal Substation.

The Project will primarily use single-pole wood structures. Typical pole heights will range from 70 to 90 feet above ground and spans between poles will generally range from 350 to 400 feet. Final design, which will occur after the Minnesota Public Utilities Commission issues a Route Permit, will determine the span and distances and need for specialty poles. Construction will generally occur within a 100-foot-wide right-of-way (ROW) easement that the Applicants will obtain to construct, operate and maintain the transmission line. The 100-foot-wide ROW easement will be centered on the Proposed Alignment (or 50 feet on either side of the transmission line).

September 5, 2024

Page 2

The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact me at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

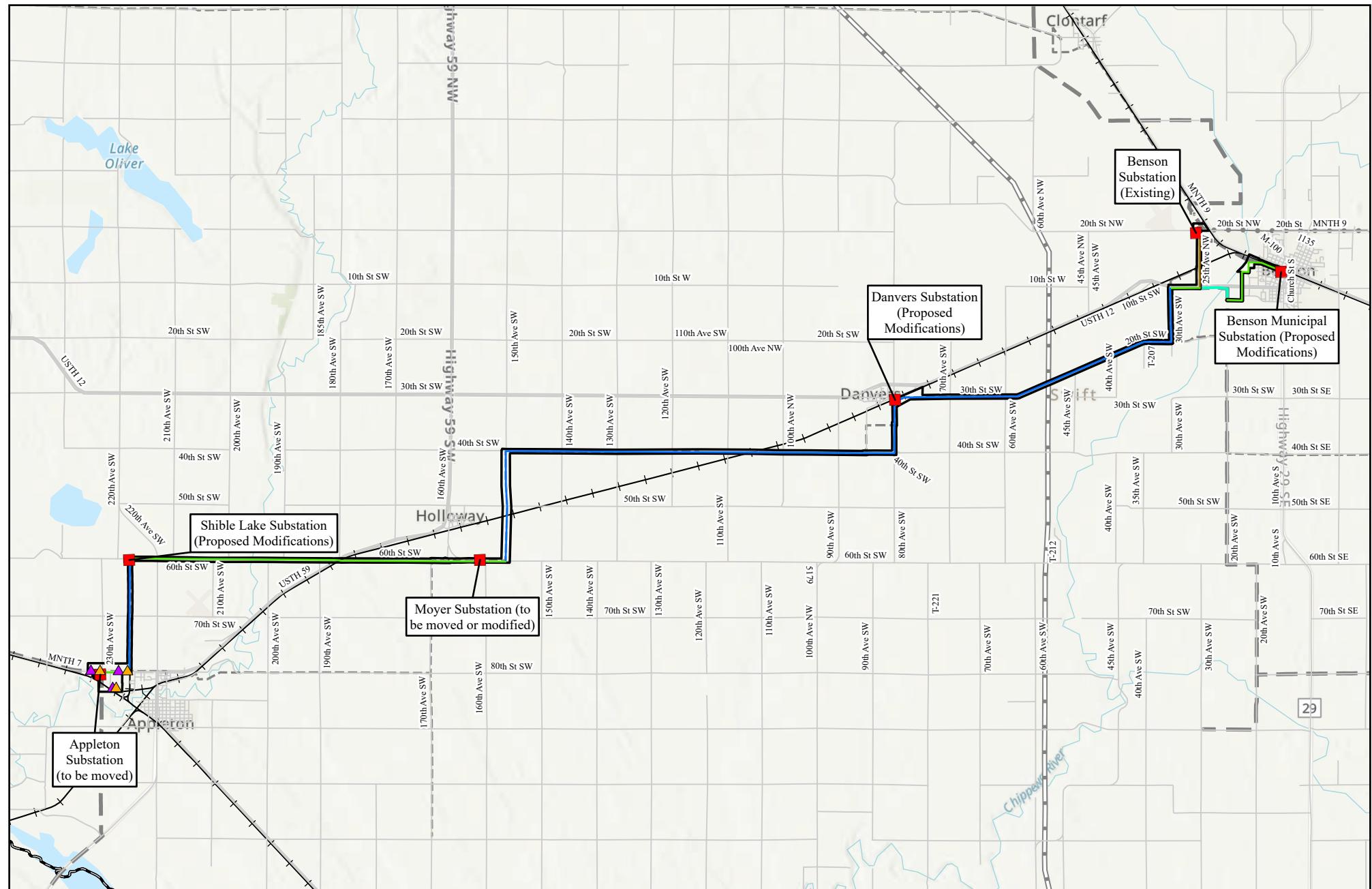
Sincerely,

GREAT RIVER ENERGY



Mark Strohfus  
Project Manager, Transmission Permitting

Encl: Project Overview Figure



# **Appleton to Benson 115-kV Transmission Line Project**

## **Swift County, Minnesota**

Legend:

- Substation (Red square)
- Appleton Distribution Substation Location Option (Yellow triangle)
- Appleton Transmission Substation Location Option (Purple triangle)
- Proposed New 115 kV Transmission Line (Green line)
- Proposed Rebuild of Existing 115-kV (Brown line)
- Proposed Upgrade 41.6-kV to 115-kV (Blue line)
- Proposed Removal of 115-kV Transmission Line (Cyan line)
- Rout Width (Black line)
- 41.6-kV Transmission Line (Dashed black line)
- 69-kV Transmission Line (Solid black line)
- 115-kV Transmission Line (Dashed black line)
- 230-kV Transmission Line (Solid black line)
- BNSF Railway (Solid black line)
- County Boundary (Solid black line)

## **Tribal Nations**

**From:** [Kristin Lenz](#)  
**To:** [jaylen.strong@boisforte-nsn.gov](mailto:jaylen.strong@boisforte-nsn.gov)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:38:00 AM  
**Attachments:** [image001.png](#)

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Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)

 merjent.  
1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 4:51 PM  
**To:** [jaylen.strong@boisforte-nsn.gov](mailto:jaylen.strong@boisforte-nsn.gov)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Apologies Jaylen, this should have been addressed to you.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)

 merjent.

1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 4:44 PM  
**To:** [jaylen.strong@boisforte-nsn.gov](mailto:jaylen.strong@boisforte-nsn.gov)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohenblust@merjent.com](mailto:mandy.bohenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Catherine Chavers:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)

  
1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

**From:** [Kristin Lenz](#)  
**To:** [EvanSchroeder@fdlband.org](mailto:EvanSchroeder@fdlband.org)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:39:00 AM  
**Attachments:** [image001.png](#)

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Thank you,  
Kristin

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



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Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 4:51 PM  
**To:** [EvanSchroeder@fdlband.org](mailto:EvanSchroeder@fdlband.org)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Evan Schroeder:

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [thpo@grandportage.com](mailto:thpo@grandportage.com)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:39:00 AM  
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Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
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763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 4:54 PM  
**To:** [thpo@grandportage.com](mailto:thpo@grandportage.com)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Rob Hull:

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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[www.merjent.com](http://www.merjent.com)



## LEECH LAKE BAND OF OJIBWE

### *Tribal Historic Preservation Office*

*Gina M Lemon, Tribal Historic Preservation Officer*

*Anita M Cloud, Tribal Historic Preservation Assistant*

---

September 23, 2024

Via Internet

Merjent

Attn: Kristin Lenz, Senior Project Manager  
1 Main Street SE – Suite 300  
Minneapolis, MN 55414

**RE: Appleton to Benson 115-kV Transmission Line Project.**

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson.

Swift County, MN

**LL THPO No. 24-479-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 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 Tribal Historic Preservation Office - Established in 1996

190 Sailstar Drive NE \* Cass Lake, MN 56633

[Gina.lemon@llojibwe.net](mailto:Gina.lemon@llojibwe.net)

**From:** [Gina Lemon](#)  
**To:** [Kristin Lenz](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 12:28:53 PM  
**Attachments:** [image001.png](#)  
[036\\_sm\\_fb\\_a1347472-45be-4a0b-af83-b901fa688c57.png](#)  
[036\\_sm\\_twitter\\_ead36a19-13db-46c4-9186-b34bea9f203c.png](#)

---

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Good Afternoon,

We do not need a copy of the Phase Ia Literature Review at this time. Thank you for the offer, we do appreciate that.

Gina

**Gina M. Lemon, Tribal Historic Preservation Officer**

**Leech Lake Band of Ojibwe**  
**109 Sailstar Drive NW**  
**Cass Lake, MN 56633**

**Office: 218-335-2940/Cell: 218-368-3668**

***Please leave a message if I do not answer, thank you!***

**Gina Lemon**  
**THPO**



[gina.lemon@llojibwe.net](mailto:gina.lemon@llojibwe.net)  
<http://www.llojibwe.org/>  
190 Sailstar Drive NW, Cass Lake, MN 56633



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---

**From:** Kristin Lenz <kristin.lenz@merjent.com>  
**Sent:** Wednesday, October 23, 2024 11:40 AM  
**To:** Gina Lemon <gina.lemon@llojibwe.net>  
**Cc:** Strohfus, Mark GRE-MG <MStrohfu@GRENergy.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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safe. If you are unsure about an email or the contents, please create a ticket. If you are prompted to enter your credentials from an email link, please create a ticket and report that email to MIS (Main Office: 218-335-3750). If you have entered your credentials in a phishing email, please notify MIS and your management immediately. If you are having random MFA prompts and you are not signing in, please notify MIS and your management immediately.

Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 4:57 PM  
**To:** [gina.lemon@llojibwe.net](mailto:gina.lemon@llojibwe.net)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Gina Lemon:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
*Senior Project Manager*  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [cheyanne.stjohn@lowersioux.com](mailto:cheyanne.stjohn@lowersioux.com)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:40:00 AM  
**Attachments:** [image001.png](#)

---

Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:06 PM  
**To:** [cheyanne.stjohn@lowersioux.com](mailto:cheyanne.stjohn@lowersioux.com)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Cheyanne St. John:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [Mike.Wilson@millelacsband.com](mailto:Mike.Wilson@millelacsband.com)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:40:00 AM  
**Attachments:** [image001.png](#)

---

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Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:11 PM  
**To:** [Mike.Wilson@millelacsband.com](mailto:Mike.Wilson@millelacsband.com)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Mike Wilson:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
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[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [noah.white@piic.org](mailto:noah.white@piic.org)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:41:00 AM  
**Attachments:** [image001.png](#)

---

Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:15 PM  
**To:** [noah.white@piic.org](mailto:noah.white@piic.org)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Noah White:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
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**From:** [Kristin Lenz](#)  
**To:** [kade.ferris@redlakenation.org](mailto:kade.ferris@redlakenation.org)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:41:00 AM  
**Attachments:** [image001.png](#)

---

Good afternoon,

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Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:17 PM  
**To:** [kade.ferris@redlakenation.org](mailto:kade.ferris@redlakenation.org)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Kade Ferris:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
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**From:** [Leonard Wabasha \(TO\)](#)  
**To:** [Kristin Lenz](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN - Cultural Resources Literature Review 2 of 2  
**Date:** Wednesday, October 23, 2024 12:01:20 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

Thank you for the information regarding the Appleton to Benson Transmission Line Project, as no burials will be impacted by the proposed project and for the fact that an Inadvertent Discovery Plan will be made available for the project I am okay with the project moving forward, should there be any changes please let me know, Thank you again and Have a Great Day!!



**LEONARD WABASHA**  
Tribal Historic Preservation Officer • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://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](mailto:kristin.lenz@merjent.com)>  
**Sent:** Wednesday, October 23, 2024 11:51 AM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN - Cultural Resources Literature Review 2 of 2

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And part 2 of 2.

Thanks!

Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Wednesday, October 23, 2024 11:50 AM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN - Cultural Resources Literature Review 1 of 2

Hi Leonard,

Please see attached – this is email 1 of 2 due to the size.

Thank you!

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Sent:** Wednesday, October 23, 2024 11:45 AM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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

Yes Please, Thank you And Have a Great Day!!



**LEONARD WABASHA**  
Tribal Historic Preservation Officer • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://shakopeedakota.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

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employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Wednesday, October 23, 2024 11:41 AM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
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[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)

  
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612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:19 PM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Leonard Wabasha:

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The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [Samantha Odegard](#); [Upper Sioux THPO](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: EXTERNAL: Re: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 12:10:00 PM  
**Attachments:** [GRE\\_Appleton to Benson\\_Phase IA\\_Letter Report\\_20241022\\_Part2of2.pdf](#)  
[image001.png](#)

---

And part 2 of 2!

Thanks,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
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**From:** Kristin Lenz  
**Sent:** Wednesday, October 23, 2024 12:10 PM  
**To:** 'Samantha Odegard' <[samanthao@uppersiouxcommunity-nsn.gov](mailto:samanthao@uppersiouxcommunity-nsn.gov)>; Upper Sioux THPO <[thpo@uppersiouxcommunity-nsn.gov](mailto:thpo@uppersiouxcommunity-nsn.gov)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: EXTERNAL: Re: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Good afternoon Samantha,

Here is part 1 of 2 of the literature review.

Thanks!  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
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**From:** Samantha Odegard <[samanthao@uppersiouxcommunity-nsn.gov](mailto:samanthao@uppersiouxcommunity-nsn.gov)>  
**Sent:** Wednesday, October 23, 2024 12:08 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>; Upper Sioux THPO <[thpo@uppersiouxcommunity-nsn.gov](mailto:thpo@uppersiouxcommunity-nsn.gov)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: Re: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Yes, please send a copy of the review.

### **Samantha Odegard**

Tribal Historic Preservation Officer | Upper Sioux Community | Phone: 320-564-6334

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**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Wednesday, October 23, 2024 11:41 AM  
**To:** Samantha Odegard <[samanthao@uppersiouxcommunity-nsn.gov](mailto:samanthao@uppersiouxcommunity-nsn.gov)>; Upper Sioux THPO <[thpo@uppersiouxcommunity-nsn.gov](mailto:thpo@uppersiouxcommunity-nsn.gov)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will

send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:22 PM  
**To:** [samanthao@uppersiouxcommunity-nsn.gov](mailto:samanthao@uppersiouxcommunity-nsn.gov); [THPO@uppersiouxcommunity-nsn.gov](mailto:THPO@uppersiouxcommunity-nsn.gov)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Samantha Odegard:

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**

**Senior Project Manager**

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**From:** [Kristin Lenz](#)  
**To:** ["Jaime.Arsenault@whiteearth-nsn.gov"](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, October 23, 2024 11:41:00 AM  
**Attachments:** [image001.png](#)

---

Good afternoon,

Merjent, on the behalf of the Applicants for the Appleton to Benson Transmission Project, submitted a Phase Ia Literature Review to the Minnesota State Historic Preservation Office on October 22, 2024. If you'd like a copy of this Literature Review, please let me know and I will send over a copy.

Thank you,  
Kristin

**Kristin Lenz**  
**Senior Project Manager**  
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---

**From:** Kristin Lenz  
**Sent:** Thursday, September 5, 2024 5:24 PM  
**To:** [Jaime.Arsenault@whiteearth-nsn.gov](#)  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Jaime Arsenault:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

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**U.S. Fish and Wildlife Service**

**From:** [Kristin Lenz](#)  
**To:** [Simpkins, Darin](#)  
**Cc:** [Galbraith, Betsy M](#); [Utrup, Nick J](#)  
**Subject:** RE: EXTERNAL: Re: [EXTERNAL] Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Tuesday, September 10, 2024 10:13:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Thank you Darin. Understood. Our intent with the letter is to notify the agency of the Project and solicit any potential issues that we should discuss in the environmental review of the MPUC Route Permit application. We will include the results of the IPaC and Dkeys in that application and will pursue necessary downstream federal permits, such as the USACE Section 404 permit, after the MPUC Route Permit process concludes.

Thank you,  
Kristin

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



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---

**From:** Simpkins, Darin <[Darin\\_Simpkins@fws.gov](mailto:Darin_Simpkins@fws.gov)>  
**Sent:** Tuesday, September 10, 2024 9:57 AM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Galbraith, Betsy M <[betsy\\_galbraith@fws.gov](mailto:betsy_galbraith@fws.gov)>; Utrup, Nick J <[nick\\_utrup@fws.gov](mailto:nick_utrup@fws.gov)>  
**Subject:** Re: EXTERNAL: Re: [EXTERNAL] Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Hi Kristin -

I am the point of contact for USACE and FERC project consultations, so would likely be responsible for reviewing this project. That being said, we would need an official request from a federal agency or their officially designated representative for project consultation to occur under section 7 of the ESA. You are more than welcome to collect information that can be used for those means, but the request for consultation must come from the federal agency where the nexus occurs, generally determined when an agency provides funding or a permit to conduct the project, which requires section 7 consultation.

There are ways to voluntarily consult under section 10 of the ESA when no federal nexus occurs, but take is expected. However, it is a lengthy process that would be inappropriate to pursue if a federal

nexus could exist. Again, this is a voluntary process that is not required.

I would suggest pursuing the appropriate USACE and other federal permits before pursuing consultation further at this time. USACE and other agencies have streamlined processes for consultation that they follow, and will save you a lot of time and resources.

BEST,

Darin

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Friday, September 6, 2024 2:22 PM  
**To:** Galbraith, Betsy M <[betsy\\_galbraith@fws.gov](mailto:betsy_galbraith@fws.gov)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** RE: EXTERNAL: Re: [EXTERNAL] Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Good afternoon Betsy,

No federal funding. We will be conducting the IPaC and DKey reviews as well and will include those results with our MPUC Route Permit application filing. It is possible that USACE Section 404 permitting would be required, but we would not apply for that permit until the final design is available after the MPUC Route Permit is issued.

Thank you!

Kristin

**Kristin Lenz**  
**Senior Project Manager**  
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**From:** Galbraith, Betsy M <[betsy\\_galbraith@fws.gov](mailto:betsy_galbraith@fws.gov)>  
**Sent:** Friday, September 6, 2024 1:08 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: Re: [EXTERNAL] Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Hi Kristin,

Can you please help US FWS understand any federal funds connected to this project?

Thanks,

Betsy

*Betsy Galbraith she/her*

Acting Project Leader

U.S. Fish & Wildlife Service

MN-WI Ecological Services Field Office

(920) 866-1753

**The Vision of the Minnesota-Wisconsin Field Office is to *foster a sustainable and just environment for future generations through science, collaboration, and stewardship.***



---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Thursday, September 5, 2024 2:54 PM

**To:** Galbraith, Betsy M <[betsy\\_galbraith@fws.gov](mailto:betsy_galbraith@fws.gov)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** [EXTERNAL] Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Betsy Galbraith:

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Regards,

Kristin Lenz on behalf of

Mark Strohfus

Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
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# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Minnesota-Wisconsin Ecological Services Field Office  
3815 American Blvd East  
Bloomington, MN 55425-1659  
Phone: (952) 858-0793

In Reply Refer To:

08/01/2024 15:57:40 UTC

Project Code: 2024-0009431

Project Name: Appleton to Benson

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

### **Threatened and Endangered Species**

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

### **Consultation Technical Assistance**

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of "no effect" or "may affect, not likely to adversely affect." In each case, the Service has compiled and analyzed the best available information on the species' biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a "Not Likely to Adversely Affect" (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a "May Affect" determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for "May Affect" determinations unless otherwise indicated in your output letter.

**Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review.** If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

### **Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species**

1. If IPaC returns a result of "There are no listed species found within the vicinity of the project," then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

### **Northern Long-Eared Bats**

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

This species hibernates in caves or mines only during the winter. In Minnesota and Wisconsin, the hibernation season is considered to be November 15 to March 31. During the active season (April 1 to November 14) they roost in forest and woodland habitats. Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags  $\geq 3$  inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected.

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

*If none of the above activities are proposed*, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No**

**Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

*If any of the above activities are proposed*, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the range-wide northern long-eared bat D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/ Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

### **Whooping Crane**

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

### **Other Trust Resources and Activities**

*Bald and Golden Eagles* - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

*Migratory Birds* - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

*Communication Towers* - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

*Transmission Lines* - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to

wetlands or other areas that support large numbers of raptors and migratory birds.

*Wind Energy* - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

### **State Department of Natural Resources Coordination**

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.

#### *Minnesota*

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

Email: [Review.NHIS@state.mn.us](mailto:Review.NHIS@state.mn.us)

#### *Wisconsin*

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

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

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

#### Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

## **OFFICIAL SPECIES LIST**

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

### **Minnesota-Wisconsin Ecological Services Field Office**

3815 American Blvd East  
Bloomington, MN 55425-1659  
(952) 858-0793

## PROJECT SUMMARY

Project Code: 2024-0009431

Project Name: Appleton to Benson

Project Type: Transmission Line - New Constr - Above Ground

Project Description: Electric Transmission

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@45.2614644,-95.74765466392579,14z>



Counties: Swift County, Minnesota

## ENDANGERED SPECIES ACT SPECIES

There is a total of 3 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. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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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 <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"><li>▪ This species only needs to be considered if the project includes wind turbine operations.</li></ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered

## INSECTS

NAME	STATUS
Dakota Skipper <i>Hesperia dacotae</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/1028">https://ecos.fws.gov/ecp/species/1028</a>	Threatened
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

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

FACILITY NAME	ACRES
SWIFT COUNTY WATERFOWL PRODUCTION AREA <a href="https://www.fws.gov/our-facilities?Keywords=%5C22SWIFT+COUNTY+WATERFOWL+PRODUCTION+AREA%5C22">https://www.fws.gov/our-facilities? \$Keywords=%5C22SWIFT+COUNTY+WATERFOWL+PRODUCTION+AREA%5C22</a>	5,534.284

## BALD & GOLDEN EAGLES

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

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats<sup>3</sup>, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the ["Supplemental Information on Migratory Birds and Eagles"](#).

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Dec 1 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read ["Supplemental Information on Migratory Birds and Eagles"](#), specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

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

### Breeding Season (■)

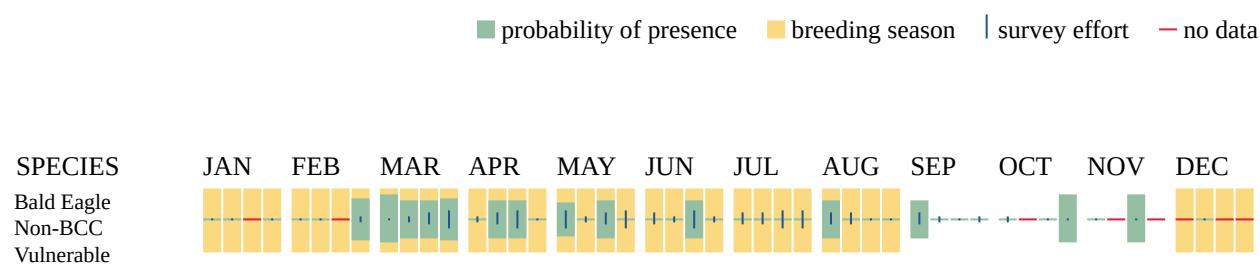
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

### Survey Effort (|)

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

### No Data (-)

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



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## MIGRATORY BIRDS

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

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats<sup>3</sup> should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "[Supplemental Information on Migratory Birds and Eagles](#)".

---

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a>	Breeds Dec 1 to Aug 31
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9399">https://ecos.fws.gov/ecp/species/9399</a>	Breeds May 15 to Oct 10
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9454">https://ecos.fws.gov/ecp/species/9454</a>	Breeds May 20 to Jul 31
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9406">https://ecos.fws.gov/ecp/species/9406</a>	Breeds Mar 15 to Aug 25
Franklin's Gull <i>Leucophaeus pipixcan</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/10567">https://ecos.fws.gov/ecp/species/10567</a>	Breeds May 1 to Jul 31
Grasshopper Sparrow <i>Ammodramus savannarum perpallidus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/8329">https://ecos.fws.gov/ecp/species/8329</a>	Breeds Jun 1 to Aug 20
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9679">https://ecos.fws.gov/ecp/species/9679</a>	Breeds elsewhere
Northern Harrier <i>Circus hudsonius</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA <a href="https://ecos.fws.gov/ecp/species/8350">https://ecos.fws.gov/ecp/species/8350</a>	Breeds Apr 1 to Sep 15
Pectoral Sandpiper <i>Calidris melanotos</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9561">https://ecos.fws.gov/ecp/species/9561</a>	Breeds elsewhere
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9398">https://ecos.fws.gov/ecp/species/9398</a>	Breeds May 10 to Sep 10

# 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 (■)

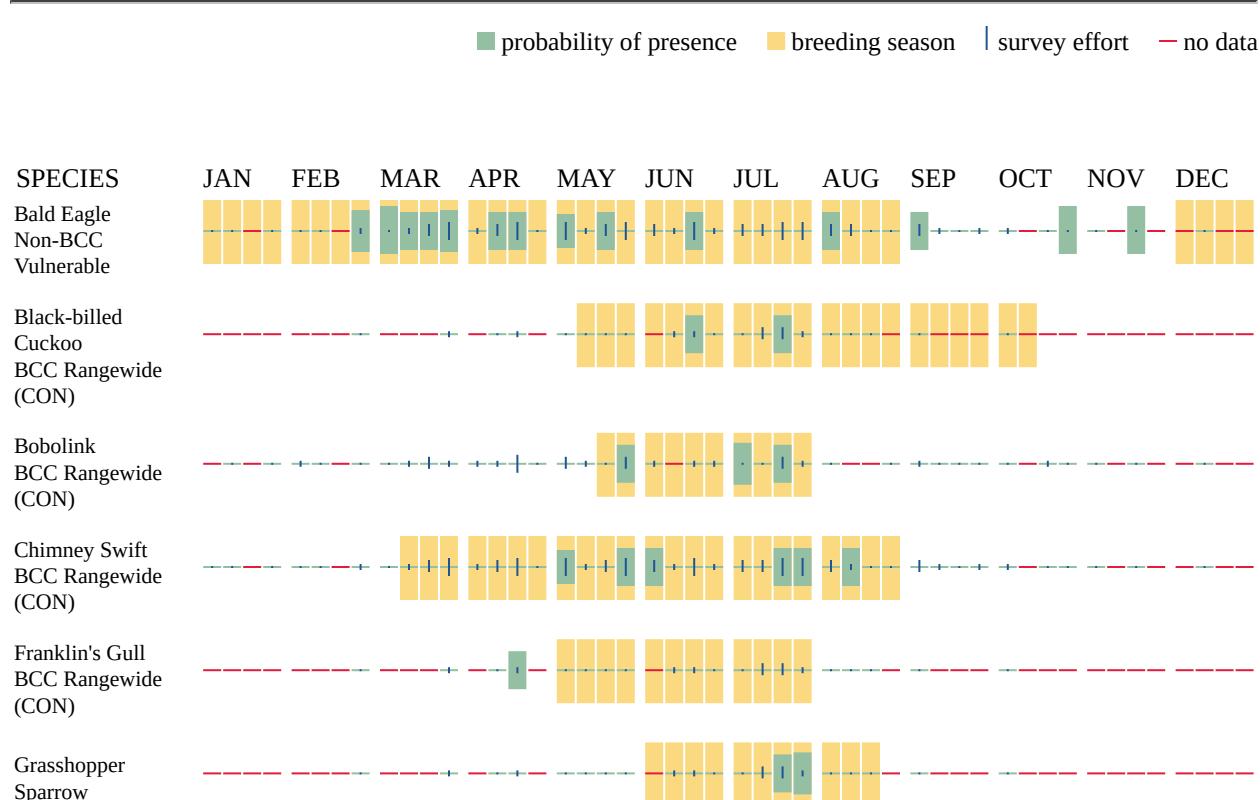
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

## Survey Effort (|)

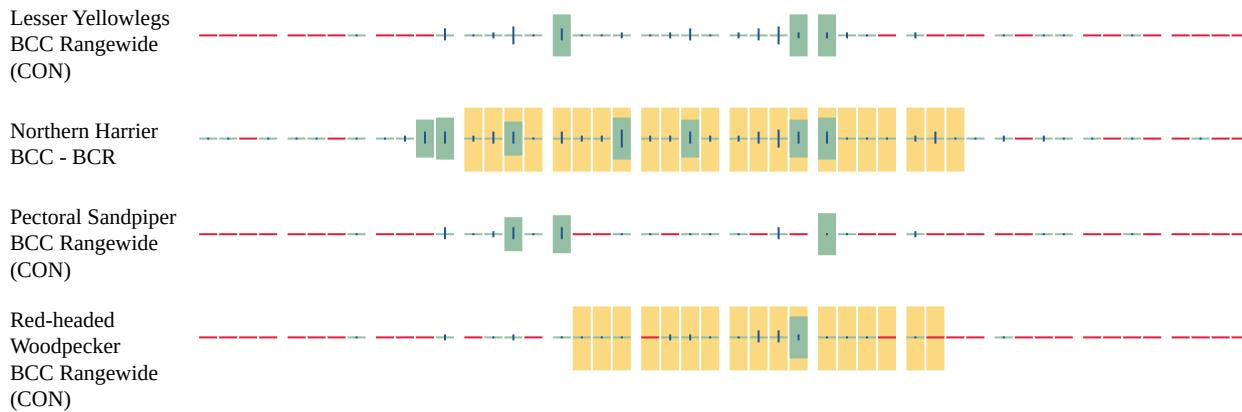
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

## No Data (-)

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



## 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 conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

### RIVERINE

- R2UBH
- R5UBH
- R4SBC
- R2UBHx
- R2UBGx

## FRESHWATER POND

- PUBFx
- PABFx
- PUBF

## FRESHWATER FORESTED/SHRUB WETLAND

- PFO1C
- PSS1C
- PSS1Cx
- PSS1A
- PFO1/SS1A
- PFO1A

## FRESHWATER EMERGENT WETLAND

- PEM1C
- PEM1A
- PEM1F
- PEM1Ad
- PEM1Ch
- PEM1Af
- PEM1Cx
- PEM1Ah
- PEM1Ax

## **IPAC USER CONTACT INFORMATION**

Agency: Merjent Inc.  
Name: Mandy Bohnenblust  
Address: 1 Main St SE, Suite 300  
City: Minneapolis  
State: MN  
Zip: 55414  
Email: mandy.bohnenblust@merjent.com  
Phone: 6127463677

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Army Corps of Engineers

**Federal Aviation Administration**



## Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V\_2018.2.0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference [CFR Title 14 Part 77.9](#).

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the [FAA Co-location Policy](#)
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the [Air Traffic Areas of Responsibility map](#) for Off Airport construction, or contact the [FAA Airports Region / District Office](#) for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

<b>* Structure Type:</b>	<input type="text" value="POWER_LINE   Utility Pole"/>
Please select structure type and complete location point information.	
<b>Latitude:</b>	45 <input type="text"/> Deg 14 <input type="text"/> M 21.89 <input type="text"/> S <input type="text" value="N"/>
<b>Longitude:</b>	96 <input type="text"/> Deg 0 <input type="text"/> M 41.29 <input type="text"/> S <input type="text" value="W"/>
<b>Horizontal Datum:</b>	<input type="text" value="NAD83"/>
<b>Site Elevation (SE):</b>	<input type="text" value="1025"/> (nearest foot)
<b>Structure Height :</b>	<input type="text" value="120"/> (nearest foot)
<b>Is structure on airport:</b>	<input checked="" type="radio"/> No <input type="radio"/> Yes

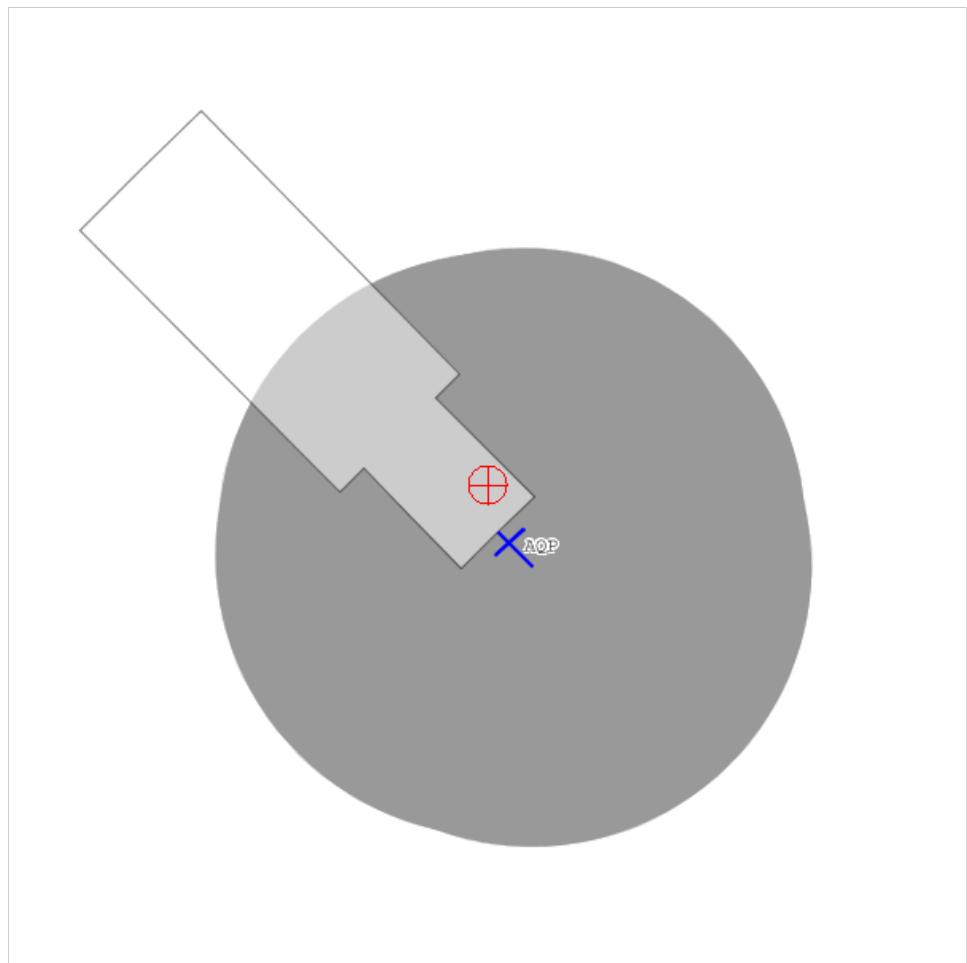
## Results

You exceed the following Notice Criteria:

Your proposed structure exceeds an instrument approach area by 125 feet and aeronautical study is needed to determine if it will exceed a standard of subpart C of 14CFR Part 77. The FAA, in accordance with 77.9, requests that you file.

77.9(b) by 92 ft. The nearest airport is AQP, and the nearest runway is 13/31.

The FAA requests that you file





## Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V\_2018.2.0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference [CFR Title 14 Part 77.9](#).

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the [FAA Co-location Policy](#)
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the [Air Traffic Areas of Responsibility map](#) for Off Airport construction, or contact the [FAA Airports Region / District Office](#) for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

<b>* Structure Type:</b>	<input type="text" value="POWER_LINE   Utility Pole"/>
Please select structure type and complete location point information.	
<b>Latitude:</b>	45 <input type="text"/> Deg 19 <input type="text"/> M 33.01 <input type="text"/> S <input type="text" value="N"/>
<b>Longitude:</b>	95 <input type="text"/> Deg 38 <input type="text"/> M 3.64 <input type="text"/> S <input type="text" value="W"/>
<b>Horizontal Datum:</b>	<input type="text" value="NAD83"/>
<b>Site Elevation (SE):</b>	<input type="text" value="1030"/> (nearest foot)
<b>Structure Height :</b>	<input type="text" value="120"/> (nearest foot)
<b>Is structure on airport:</b>	<input checked="" type="radio"/> No <input type="radio"/> Yes

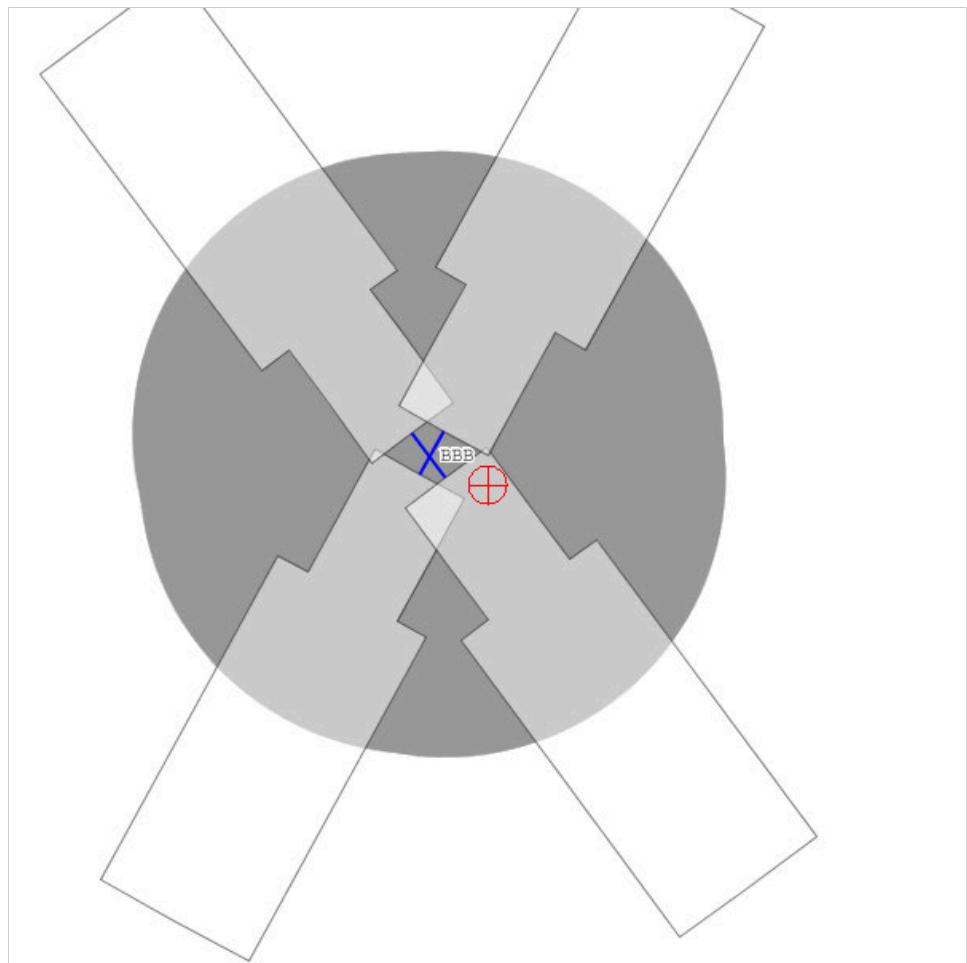
## Results

You exceed the following Notice Criteria:

Your proposed structure exceeds an instrument approach area by 112 feet and aeronautical study is needed to determine if it will exceed a standard of subpart C of 14CFR Part 77. The FAA, in accordance with 77.9, requests that you file.

77.9(b) by 82 ft. The nearest airport is BBB, and the nearest runway is 14/32.

The FAA requests that you file



**Minnesota Department of Health**

**From:** [Strohfus, Mark GRE-MG](#)  
**To:** [Strommer, Amanda \(MDH\)](#); [Kristin Lenz](#)  
**Cc:** [Mandy Bohnenblust](#); [Richter, Dereck \(He/Him/His\) \(MDH\)](#); [Luzinski, Danielle \(MDH\)](#); [Clemens-Billaigbakpu, Yarta \(MDH\)](#); [Wettlaufer, Mark \(MDH\)](#); [Woodside, John \(MDH\)](#)  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Saturday, October 5, 2024 8:57:47 AM  
**Attachments:** [image001.png](#)

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

Amanda and Yarta,

Thank you for the comments and maps. The City of Benson is a project partner and we'll work with them to address your recommendations.

Best Regards,

**Mark Strohfus**

**Project Manager, Transmission Permitting**

**Great River Energy**

12300 Elm Creek Boulevard  
Maple Grove, MN 55369-4718  
D: 763-445-5210  
C: 612-961-9820

[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)

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**From:** Strommer, Amanda (MDH) <[amanda.strommer@state.mn.us](mailto:amanda.strommer@state.mn.us)>  
**Sent:** Friday, October 4, 2024 3:22 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>; Richter, Dereck (He/Him/His) (MDH) <[dereck.richter@state.mn.us](mailto:dereck.richter@state.mn.us)>; Luzinski, Danielle (MDH) <[Danielle.Luzinski@state.mn.us](mailto:Danielle.Luzinski@state.mn.us)>; Clemens-Billaigbakpu, Yarta (MDH) <[yarta.clemens-billaigbakpu@state.mn.us](mailto:yarta.clemens-billaigbakpu@state.mn.us)>; Wettlaufer, Mark (MDH) <[mark.wettlaufer@state.mn.us](mailto:mark.wettlaufer@state.mn.us)>; Woodside, John (MDH) <[john.woodside@state.mn.us](mailto:john.woodside@state.mn.us)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

**This email was sent by an external sender. Opening attachments or clicking links from untrusted sources may cause damage to you and Great River Energy.**

The Minnesota Department of Health (MDH) Drinking Water Protection Program appreciates the notification and the opportunity to provide comments on the Proposed Transmission Line Project in Swift County.

The mission of MDH is to protect, maintain, and improve the health of all Minnesotans. The Drinking Water Protection Program protects public health by ensuring a safe and adequate supply of drinking water at all public water systems, which are those that serve water to the

public. The City of Appleton completed a Wellhead Protection Plan in August, 2020 and the City of Benson is in the process to amend their current Wellhead Protection Plan.

The letter from Great River Energy indicates that the transmission line project would be going through the Benson Drinking Water Supply Management Area (DWSMA). It will also be going through the Benson Emergency Response Area (ERA). The intent of this letter is to ensure that you are aware of the location of these areas and where you can find the GIS data for the DWSMAs in your project areas. Attached are maps with the locations and here is a link to the data:

<https://gisdata.mn.gov/dataset/water-drinking-water-supply>

Based on what was presented to us we did not identify any major issues or concerns with the proposal. We want to make note of the following setback distances from MN well code. Electrical transformer storage area, oil filled is 50 feet and electric transmission line is 10 feet required setback. It appears that the proposal meets these setbacks but please ensure they are met during construction.

We also advise that spill response be taken into consideration during construction and that any spills from equipment and machinery are immediately addressed. Ensure that the city water supply wells are protected from any spills, especially within the emergency response area (ERA).

If you have any questions or if there is any way we can be of further assistance, please contact us.

**Amanda Strommer**

Principal Planner | Drinking Water Protection Section  
Minnesota Department of Health  
1400 E. Lyon Street, Marshall, MN 56258-1268  
Office: 507-476-4241 | Mobile: 507-649-0854

**Yarta Clemens-Billaigbakpu**

*Source Water Protection Program  
Drinking Water Protection Section  
Minnesota Department of Health  
625 Robert St. N  
Saint Paul, MN  
Office: 651-201-4686*

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Sent:** Thursday, September 5, 2024 2:58 PM

**To:** Strommer, Amanda (MDH) <[amanda.strommer@state.mn.us](mailto:amanda.strommer@state.mn.us)>; Clemens-Billaigbakpu, Yarta

(MDH) <[yarta.clemens-billaigbakpu@state.mn.us](mailto:yarta.clemens-billaigbakpu@state.mn.us)>

**Cc:** Strohfus, Mark GRE-MG <[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)>; Mandy Bohnenblust

<[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>; Richter, Dereck (He/Him/His) (MDH)

<[dereck.richter@state.mn.us](mailto:dereck.richter@state.mn.us)>; Nielsen, Danielle (MDH) <[Danielle.Nielsen@state.mn.us](mailto:Danielle.Nielsen@state.mn.us)>

**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Amanda and Yarta:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,

Kristin Lenz on behalf of

Mark Strohfus

Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**

**Senior Project Manager**

612.924.3962 direct

763.913.4740 mobile

[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [Clemens-Billaigbakpu, Yarta \(MDH\)](#); [Strohfus, Mark GRE-MG](#)  
**Cc:** [Mandy Bohnenblust](#); [Richter, Dereck \(He/Him/His\) \(MDH\)](#); [Nielsen, Danielle \(MDH\)](#); [Strommer, Amanda \(MDH\)](#)  
**Subject:** RE: EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Thursday, September 19, 2024 4:05:00 PM  
**Attachments:** [image001.png](#)  
[AppletonBenson\\_20240919.zip](#)

---

Good afternoon Yarta,

Yes, the attached shapefiles include the Route Width, proposed centerline and associated 100-foot-wide right-of-way. The Route Width is a larger corridor that encompasses the centerline and right-of-way and allows adjustments as needed to avoid resources and/or address landowner concerns. The Route Width will be assessed by the Minnesota Public Utilities Commission (MPUC) as part of the Certificate of Need and Route Permit process. We have also included two additional alignment alternatives within the City of Benson in the shapefile; these are both encompassed by the Route Width, but we are currently assessing the potential environmental and human impacts associated with these two alignment alternatives. Please let us know if you have any preferences or concerns with the proposed or alignment alternatives.

Thank you,  
Kristin

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



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Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Clemens-Billaigbakpu, Yarta (MDH) <[yarta.clemens-billaigbakpu@state.mn.us](mailto:yarta.clemens-billaigbakpu@state.mn.us)>  
**Sent:** Friday, September 6, 2024 10:13 AM  
**To:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>  
**Cc:** Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>; Richter, Dereck (He/Him/His) (MDH) <[dereck.richter@state.mn.us](mailto:dereck.richter@state.mn.us)>; Nielsen, Danielle (MDH) <[Danielle.Nielsen@state.mn.us](mailto:Danielle.Nielsen@state.mn.us)>; Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>; Strommer, Amanda (MDH) <[amanda.strommer@state.mn.us](mailto:amanda.strommer@state.mn.us)>  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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

Hi Mark,

Can the GIS shapefiles of the various items represented in the legend of your attached map be made available to me. Having those files will speed up the assessment process.

Thanks!

Yarta CB

**Yarta Clemens-Billaigbakpu**

*Source Water Protection Program*

*Drinking Water Protection Section*

**Minnesota Department of Health**

*625 Robert St. N*

*Saint Paul, MN*

*Office: 651-201-4686 |*



---

**From:** Kristin Lenz <kristin.lenz@merjent.com>

**Sent:** Thursday, September 5, 2024 2:58 PM

**To:** Strommer, Amanda (MDH) <amanda.strommer@state.mn.us>; Clemens-Billaigbakpu, Yarta (MDH) <yarta.clemens-billaigbakpu@state.mn.us>

**Cc:** Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Richter, Dereck (He/Him/His) (MDH) <derek.richter@state.mn.us>; Nielsen, Danielle (MDH) <Danielle.Nielsen@state.mn.us>

**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Amanda and Yarta:

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The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**Minnesota Department of Natural Resources**

**From:** [Schaefer, Benjamin \(DNR\)](#)  
**To:** [Ihns, Karla A \(DNR\)](#)  
**Cc:** [Haley, Byron](#); [Barrett, Molly \(She/Her/Hers\) \(DNR\)](#); [Fairman, Kate \(DNR\)](#); [Horton, Becky \(DNR\)](#); [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#); [Kristin Lenz](#)  
**Subject:** EXTERNAL: FW: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Thursday, September 5, 2024 5:01:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Aligns\\_ROW100ft\\_PREFERRED\\_20231129\\_Appleton\\_Benson.zip](#)  
[GRE\\_Appleton-Benson\\_Intro\\_Letter\\_MDNR\\_20240905.pdf](#)  
**Importance:** High

---

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

Good afternoon Karla,

Can you please review this project for Merjent. Comments can go to Kristin. Thank you.



BENJAMIN J. SCHAEFER

**Southern Region Operations Coordinator**

Division of Lands and Minerals

21371 State Highway 15

New Ulm, MN 56073

Phone: 507-233-1211

Cell: 507-276-1985

[benjamin.schaefer@state.mn.us](mailto:benjamin.schaefer@state.mn.us)

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Sent:** Thursday, September 5, 2024 4:41 PM

**To:** Schaefer, Benjamin (DNR) <[benjamin.schaefer@state.mn.us](mailto:benjamin.schaefer@state.mn.us)>

**Cc:** Byron, Haley (DNR) <[Haley.Byron@state.mn.us](mailto:Haley.Byron@state.mn.us)>; Barrett, Molly (She/Her/Hers) (DNR) <[Molly.Barrett@state.mn.us](mailto:Molly.Barrett@state.mn.us)>; Fairman, Kate (DNR) <[kate.fairman@state.mn.us](mailto:kate.fairman@state.mn.us)>; Horton, Becky (DNR) <[becky.horton@state.mn.us](mailto:becky.horton@state.mn.us)>; Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Benjamin Schaefer:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to

construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
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September 5, 2024

Benjamin Schaefer  
Lands & Minerals – Region 4 (Southern Region)  
Minnesota Department of Natural Resources  
21371 State Highway 15  
New Ulm, MN 56073  
[benjamin.schaefer@state.mn.us](mailto:benjamin.schaefer@state.mn.us)

**Subject: Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency and the City of Benson  
Appleton to Benson 115-kV Transmission Line Project in Swift County, Minnesota**

Benjamin Schaefer:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and the City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

As shown in the enclosed Figure, the Applicants propose to upgrade approximately 18 miles of existing 41.6-kV transmission lines, reconducto approximately 1 mile of an existing 115-kV transmission line, and construct 8 miles of new 115-kV transmission line connecting the following substations: Appleton, Shible Lake, Moyer, Danvers, and Benson. Additionally, a 1.7-mile 115-kV transmission line would be installed from Great River Energy's existing AG-BK 115-kV line southwest of the City of Benson to the Benson Municipal Substation. As part of this construction, 0.7 mile of the existing AG-BK line would be removed, including the Chippewa River crossing. The Project will also include construction of new Appleton transmission and distribution substations, a new Moyer Substation or modifications to the existing Moyer Substation, and modifications to the following existing substations: Shible Lake; Danvers; and Benson Municipal Substation.

The Project will primarily use single-pole wood structures. Typical pole heights will range from 70 to 90 feet above ground and spans between poles will generally range from 350 to 400 feet. Final design, which will occur aft the Minnesota Public Utilities Commission issues a Route Permit, will determine the span and distances and need for specialty poles. Construction will generally occur within a 100-foot-wide right-of-way (ROW) easement that the Applicants will obtain to construct, operate and maintain the transmission line. The 100-foot-wide ROW easement will be centered on the Proposed Alignment (or 50 feet on either side of the transmission line).

The Applicants have considered MnDNR comments received on February 23, 2024 (enclosed) and have proposed a Project Alignment that avoids the Danvers Wildlife Management Area (WMA). Based on the

Applicants' review of publicly available data, the Proposed Alignment does not currently cross any MnDNR-administered public lands; although it is located on the north side of 30<sup>th</sup> St SW from the Clair Rollings WMA. The Applicants would appreciate the MDNR's confirmation that the Proposed Alignment avoids impacts to this WMA.

The Proposed Alignment would involve installation of the 115-kV transmission line across four public waters, and removal of a portion of an existing 115-kV transmission line across the Chippewa River, as noted in Table 1 and shown in the enclosed Figures.

**Table 1. Public Waters Crossed by the Proposed Alignment**

Waterbody Name	Kittle Number	Agency Designations	Flow Regime	Project Improvements
Pomme de Terre River	M-055-179	Canoe Route / Natural / Impaired	Perennial	New 115-kV crossing
Cottonwood Creek	M-055-158-014	Altered Natural / Public Ditch	Intermittent	Upgrade of Otter Tail Power OTP110 41.6-kV to 115-kV
Judicial Ditch 8	M-055-158-033.5-002	Altered Natural / Public Ditch / Impaired	Perennial	Upgrade of Otter Tail Power OTP110 41.6-kV to 115-kV
County Ditch 3	M-055-158-033.5	Altered Natural / Public Ditch / Impaired	Perennial	Upgrade of Otter Tail Power OTP110 41.6-kV to 115-kV
Chippewa River	M-055-158	Altered Natural / Public Ditch / Impaired	Perennial	Removal of existing AG-BK 115-kV line

On behalf of the Applicants, Merjent, Inc. (Merjent) submitted a formal Natural Heritage Review Request (2023-00817), and received a response from the MnDNR on January 18, 2024. The Applicants will continue to work with the MnDNR regarding avoidance and mitigation measures to protect the features and species discussed in this letter once a final route has been selected.

September 5, 2024

Page 3

The Applicants have enclosed shapefiles of the Proposed Route and associated 100-foot-wide ROW with this letter for further review. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact me at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Sincerely,

GREAT RIVER ENERGY

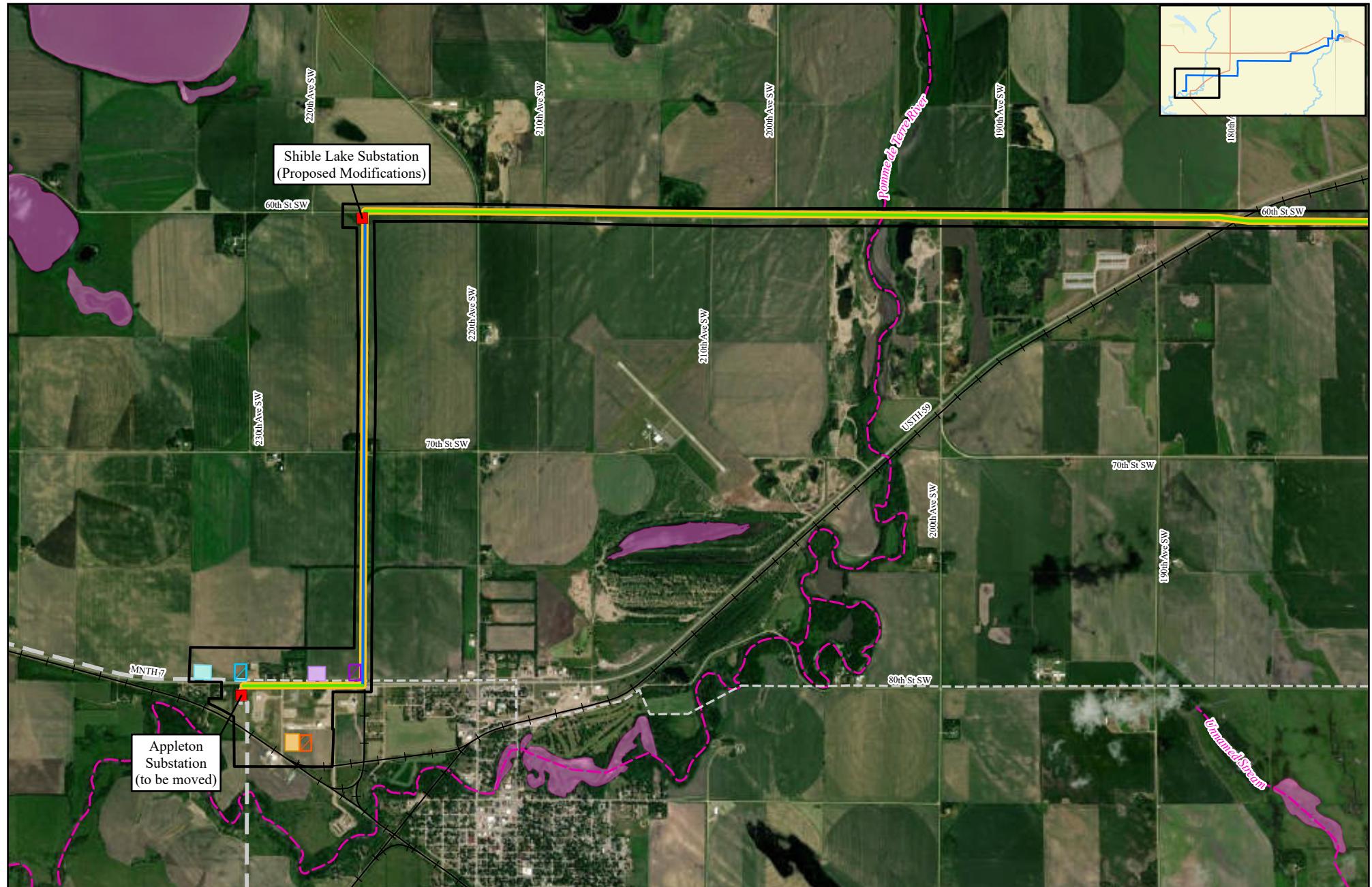


Mark Strohfus  
Project Manager, Transmission Permitting

Encl: Figures  
MDNR Correspondence (February 2024)  
Shapefiles of Proposed Route

cc:

Kate Fairman, Environmental Review Operations Lead / Energy Projects Review  
Becky Horton, Environmental Review Planner  
Haley Byron, Ecological and Water Resources  
Molly Barrett, Natural Heritage Review Specialist  
Kristin Lenz, Merjent  
Mandy Bohnenblust, Merjent



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Feet

N

## Appleton to Benson 115-kV Transmission Line Project

### Swift County, Minnesota

Page 1 of 4



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Feet

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## Appleton to Benson 115-kV Transmission Line Project Swift County, Minnesota

Page 2 of 4

- Substation
- Proposed New 115 kV Transmission Line
- Proposed Upgrade 41.6-kV to 115-kV
- 100ft Right-of-Way
- Route Width
- BNSF Railway
- 41.6-kV Transmission Line
- PWI Waterway
- PWI Basin
- County Boundary

Date: (7/30/2024) Source:



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1:36,000

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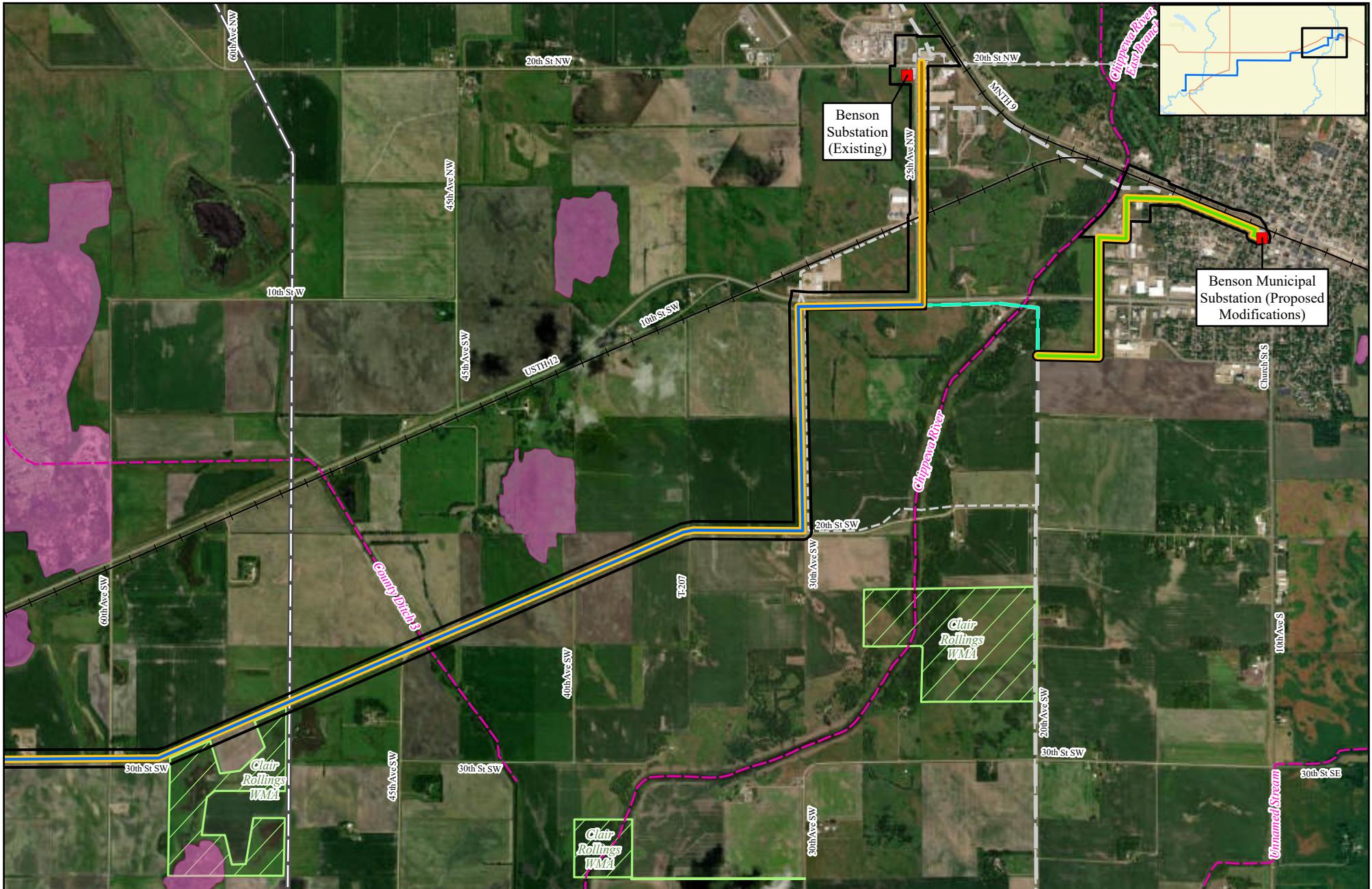
## Appleton to Benson 115-kV Transmission Line Project Swift County, Minnesota

Page 3 of 4

Substation  
Proposed Upgrade 41.6-kV to 115-kV  
100ft Right-of-Way  
Route Width  
County Boundary

— BNSF Railway  
- - - 41.6-kV Transmission Line  
- - - PWI Waterway  
- - - PWI Basin  
— County Boundary

Date: (7/30/2024) Source:



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Feet

1:36,000  
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## Appleton to Benson 115-kV Transmission Line Project Swift County, Minnesota

Page 4 of 4

- Substation
- Proposed New 115 kV Transmission Line
- Proposed Rebuild of Existing 115-kV
- Proposed Upgrade 41.6-kV to 115-kV
- Proposed Removal of 115-kV Transmission Line
- 100ft Right-of-Way
- Route Width
- BNSF Railway
- 115-kV Transmission Line
- 230-kV Transmission Line
- 69-kV Transmission Line
- 41.6-kV Transmission Line
- Clair Rollins Wildlife Management Area
- PWI Waterway
- PWI Basin
- County Boundary

Source: (7/30/2024)

**From:** [Byron, Haley \(DNR\)](#)  
**To:** [Strohfus, Mark GRE-MG](#)  
**Cc:** [Warzecha, Cynthia \(DNR\)](#)  
**Subject:** RE: Appleton to Benson Transmission Line Project  
**Date:** Friday, February 23, 2024 2:52:49 PM  
**Attachments:** [image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image002.png](#)

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Hi Mark,

The Natural Heritage Review Letter does a great job of identifying concerns and mitigation measures for the proposed project. I just have one item to add. Following the existing 41.6kV line to the extent possible is preferred, particularly between the City of Danvers and Benson. The alternative route identified to the north passes through Danvers Wildlife Management Area which contains a large public water basin. The Holloway Railroad Prairie also runs parallel to this alternative. Following the existing line will reduce potential natural resource impacts and avoid vegetation clearing in the WMA.

Please let me know if you have any questions moving forward. Thank you!

**Haley Byron**  
Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street  
Mankato, MN 56001  
Office: 507-389-8813  
Cell: 507-910-8963  
Email: [haley.byron@state.mn.us](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



---

**From:** Byron, Haley (DNR)  
**Sent:** Monday, January 8, 2024 11:05 AM  
**To:** Strohfus, Mark GRE-MG <MStrohfu@GRENergy.com>  
**Cc:** Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>  
**Subject:** RE: Appleton to Benson Transmission Line Project

Hi Mark,

Can you send me a shapefile of the blue line in your previous email and the existing transmission line?

Thank you!

**Haley Byron**  
Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street  
Mankato, MN 56001  
Office: 507-389-8813  
Cell: 507-910-8963  
Email: [haley.byron@state.mn.us](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



---

**From:** Byron, Haley (DNR)  
**Sent:** Wednesday, December 6, 2023 8:44 AM  
**To:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>  
**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>; Aukee, Dale GRE-MG <[DAukee@GREnergy.com](mailto:DAukee@GREnergy.com)>; Swenson, Michael GRE-MG <[mswenson@GREnergy.com](mailto:mswenson@GREnergy.com)>  
**Subject:** RE: Appleton to Benson Transmission Line Project

Thank you, Mark!

**Haley Byron**  
Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**  
117 Rogers Street  
Mankato, MN 56001  
Office: 507-389-8813  
Cell: 507-910-8963  
Email: [haley.byron@state.mn.us](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



---

**From:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>  
**Sent:** Tuesday, December 5, 2023 4:18 PM  
**To:** Byron, Haley (DNR) <[Haley.Byron@state.mn.us](mailto:Haley.Byron@state.mn.us)>  
**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>; Aukee, Dale GRE-MG <[DAukee@GREnergy.com](mailto:DAukee@GREnergy.com)>; Swenson, Michael GRE-MG <[mswenson@GREnergy.com](mailto:mswenson@GREnergy.com)>  
**Subject:** FW: Appleton to Benson Transmission Line Project

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Haley,

Attached are shapefiles for the alignment alternatives we are considering for the Appleton to Benson 115kV transmission line.

There are a couple alternatives included in these files. When I load them into my GIS, it comes out as follows:



Some people don't always see the same colors being loaded into their GIS.

The blue line is likely where will be proposing to construct as it primarily follows existing 41.6kV transmission lines, which will be converted to 115 kV. We are also looking at a couple alternatives which appear as brown lines above.

If you have a hard time interpreting what loads into your GIS, I'd be happy to get on a video call and we can walk through it.

I know there are some DNR lands along the proposed alignment, and we'd appreciate any feedback from you regarding those areas.

Sorry it took awhile to get these to you. We were trying to optimize some of the alternative routes and wanted to make sure you had the best info available. I am doing a site visit on Thursday, and I'll let you know if we make any additional changes as a result of that site visit.

Please contact me with any questions.

Thanks,

**Mark Strohfus**

**Project Manager, Transmission Permitting**

12300 Elm Creek Boulevard

Maple Grove, MN 5536-4718

D: 763-445-5210

C: 612-961-9820

[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)

---

**From:** Aukee, Dale GRE-MG <[DAukee@GREnergy.com](mailto:DAukee@GREnergy.com)>

**Sent:** Tuesday, December 5, 2023 2:32:11 PM

**To:** Swenson, Michael GRE-MG <[mswenson@GREnergy.com](mailto:mswenson@GREnergy.com)>

**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>; Byron, Haley (DNR) <[Haley.Byron@state.mn.us](mailto:Haley.Byron@state.mn.us)>;

Pearson, Diona GRE-MG <[DPearson@GREnergy.com](mailto:DPearson@GREnergy.com)>

**Subject:** RE: Appleton to Benson Transmission Line Project

Mike, will you please follow up with Haley? Thank you.

Dale Aukee, SR/WA  
Sr. Field Representative, Land Rights

Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
Direct 763-445-5978  
Cell 612-840-4019  
Fax 763-445-6778

---

**From:** Byron, Haley (DNR) <[Haley.Byron@state.mn.us](mailto:Haley.Byron@state.mn.us)>  
**Sent:** Tuesday, December 5, 2023 1:55 PM  
**To:** Pearson, Diona GRE-MG <[DPearson@GREnergy.com](mailto:DPearson@GREnergy.com)>  
**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>; Aukee, Dale GRE-MG <[DAukee@GREnergy.com](mailto:DAukee@GREnergy.com)>  
**Subject:** RE: Appleton to Benson Transmission Line Project

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Good Afternoon,

I'm reaching out again regarding shapefiles for the project.

Thank you!

**Haley Byron**  
Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**  
117 Rogers Street  
Mankato, MN 56001  
Office: 507-389-8813  
Cell: 507-910-8963  
Email: [haley.byron@state.mn.us](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



---

**From:** Byron, Haley (DNR)  
**Sent:** Thursday, November 16, 2023 10:28 AM  
**To:** Pearson, Diona GRE-MG <[DPearson@GREnergy.com](mailto:DPearson@GREnergy.com)>  
**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>; [daukee@greenergy.com](mailto:daukee@greenergy.com)  
**Subject:** RE: Appleton to Benson Transmission Line Project

Hello Diona,

Please see the below request regarding shapefiles for the Appleton to Benson project.

Thank you,

**Haley Byron**

Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street

Mankato, MN 56001

Office: 507-389-8813

Cell: 507-910-8963

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

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



---

**From:** Byron, Haley (DNR)

**Sent:** Thursday, November 16, 2023 10:26 AM

**To:** 'daukee@grenergy.com' <[daukee@grenergy.com](mailto:daukee@grenergy.com)>

**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>

**Subject:** RE: Appleton to Benson Transmission Line Project

Hello Diona,

I wanted to reach out again regarding project shapefiles. Once I receive the shapefiles, I will provide an early coordination letter for the project.

Thank you!

**Haley Byron**

Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street

Mankato, MN 56001

Office: 507-389-8813

Cell: 507-910-8963

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

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



---

**From:** Byron, Haley (DNR)

**Sent:** Thursday, October 26, 2023 8:40 AM

**To:** [daukee@grenergy.com](mailto:daukee@grenergy.com)

**Cc:** Warzecha, Cynthia (DNR) <[cynthia.warzecha@state.mn.us](mailto:cynthia.warzecha@state.mn.us)>

**Subject:** Appleton to Benson Transmission Line Project

Hello Dale,

Thank you for initiating early coordination for the proposed Appleton to Benson transmission line project. In order to facilitate a thorough review, please provide GIS-compatible shapefiles of the project.

Thank you,

**Haley Byron**

Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street

Mankato, MN 56001

Office: 507-389-8813

Cell: 507-910-8963

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

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



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**From:** [Byron, Haley \(DNR\)](#)  
**To:** [Aukee, Dale GRE-MG](#)  
**Cc:** [Warzecha, Cynthia \(DNR\)](#)  
**Subject:** Appleton to Benson Transmission Line Project  
**Date:** Thursday, October 26, 2023 8:40:09 AM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

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Hello Dale,

Thank you for initiating early coordination for the proposed Appleton to Benson transmission line project. In order to facilitate a thorough review, please provide GIS-compatible shapefiles of the project.

Thank you,

**Haley Byron**

Regional Environmental Assessment Ecologist | Southern Region EWR

**Minnesota Department of Natural Resources**

117 Rogers Street

Mankato, MN 56001

Office: 507-389-8813

Cell: 507-910-8963

Email: [haley.byron@state.mn.us](mailto:haley.byron@state.mn.us)  
[mndnr.gov](http://mndnr.gov)



**Minnesota Department of Transportation**

**From:** [Britta Bergland](#)  
**To:** [stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)  
**Cc:** [Kristin Lenz](#); [Strohfus, Mark GRE-MG](#)  
**Subject:** Great River Energy - Appleton to Benson Project Utility ENM Submittal  
**Date:** Friday, December 20, 2024 3:35:01 PM  
**Attachments:** [GRE - Appleton to Benson Utility Project Review Rev0 20241220.pdf](#)  
[image001.png](#)  
[GRE\\_Appleton\\_to\\_Benson\\_ENM\\_Correspondence\\_Rev0\\_20241220.pdf](#)  
[GRE\\_Appleton\\_to\\_Benson\\_ENM\\_WIMN\\_500ft\\_Rev0\\_20241220.xls](#)  
[Appleton\\_Benson\\_Project\\_20241216.kmz](#)  
[Appleton\\_Benson\\_Project\\_20241216.zip](#)  
[Appleton\\_Benson\\_Project\\_20241216.kml](#)

---

Hello Stacy,

On behalf of *Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency through its agent Missouri River Energy Services, Agralite Electric Cooperative, and the City of Benson (together, the Applicants)*, please find the completed Utility Early Notification Memo form and supplemental information for the *Appleton to Benson Transmission Line Project in Swift County, Minnesota*. The submittal materials include:

- ENM Form (attached)
- Correspondence Supplement (attached)
- Table Supplement (attached)
- Project shapefiles, KML files, and KMZ file (attached)
- Figure Supplement (available at the following Adobe Cloud link due to file size:  
<https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:61da9b25-5d8e-4356-8dfa-91467903250d>)

Please reach out if you have any questions as you complete your review. The Applicants intend to file a joint Certificate of Need/Route Permit application to the Minnesota Public Utilities Commission later in December 2024.

Thank you,

Britta

**Britta Bergland**  
612.746.3673 direct  
[britta.bergland@merjent.com](mailto:britta.bergland@merjent.com)



1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
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Appleton to Benson 115-kV Transmission Project  
Minnesota Department of Transportation Meeting  
November 14, 2024

Participants:

Minnesota Department of Transportation (MnDOT): Paul Hartzheim, Stacy Kotch Egstad, John Gildersleeve, Ann Driver

Great River Energy: Mark Strohfus

Merjent: Kristin Lenz, Mandy Bohnenblust

Strohfus provided overview of the Project description and of the three potential Appleton Substation options being considered. The Project would parallel and cross MnDOT-managed State Highway 7 near the Appleton Substation. Strohfus also explained that this is a partnership with other utilities, including Otter Tail, WMMPA, Agralite and City of Benson (the Applicants). The existing OTP 41.6-kV line will be converted to an express feeder at this location.

Gildersleeve indicated that the area along State Highway 7 has been seeded with native plants and is flagged as a monarch butterfly adopted area. Review in this area will occur during the ENM process. MnDOT is a participant in the Monarch Candidate Conservation Agreement with Assurances (CCAA). Great River Energy will work with MnDOT and U.S. Fish and Wildlife Service (USFWS) on this – mitigation could consist of include milkweed in the native plant seed mixes in this area. South of the western substation option there is snow fencing as well that will need to be considered.

Merjent will pull together the ENM form for the MnDOT right-of-way (ROW) crossed by the Project. MnDOT will not be able to provide feedback prior to filing the Certificate of Need / Route Permit (CN/RP) Application with the Minnesota Public Utilities Commission (MPUC), but it is helpful for their scoping process.

The Project has a short crossing of State Highway 119. Appleton Municipal Airport is located to the south of the Project; the Applicants have conducted the Federal Aviation Administration (FAA) Notice Criteria Tool and it is included in the CN/RP Application.

MnDOT inquired on the setback from the railroad ROW; the Applicants are currently coordinating with the BNSF Railway. Appears that the distance from the US Highway 59 ROW to the other side of the railroad ROW is approximately 550 feet. A Crossing License will be required from the BNSF Railway. MnDOT prefers not to have poles in the road ROW with concrete foundation. Looking to span both the road and railway, potentially with steel structures on both sides with concrete foundations or H-frames, pending further discussion with the other Applicants.

The last crossing of MnDOT-managed roads is at US Highway 12 where the proposed alignment parallels Highway 12 for 0.5 mile and then crosses Highway 12. Approximately 2,500 feet of the existing AB-BK 115-kV line that parallels US Highway 12 will also be removed. Removal of the existing line will likely need a Misc. Permit from MnDOT. Misc. Permits are often issued in advance of the Utility Accommodation Permit because tree clearing activities need to occur first. The Utility Companies will likely seek separate Utility Accommodation Permits depending on the owner of the portion of the line; however, the Misc. Permit may be for the Project as a whole. This area has been flagged in the MnDOT system for potential threatened and endangered species and vegetation concerns, so this will also need to be reviewed during the ENM process.

Appleton to Benson 115-kV Transmission Project  
Minnesota Department of Transportation Meeting  
November 14, 2024

There is an additional US Highway 12 crossing as the line goes into the Benson Municipal Substation in the City of Benson. MnDOT agrees that separate Utility Accommodation Permits make sense for the different lines with different owners. Within the City of Benson, current preference is to stay on the north side of Pacific Ave; however, the ROW is tight to the BNSF Railway ROW. The license from the BNSF Railway can take a long time to obtain, which is a concern amongst the utilities. The Applicants are currently coordinating with the BNSF Railway to understand the timeline and process. The Applicants are also exploring alternates both north and south of Pacific Ave in case the BNSF License process does not align with the Project schedule.

The Applicants have submitted the draft CN/RP application to the DOC-EERA for a courtesy review, which is typically conducted within about 30 days. The Applicants will then file the official final application after incorporating those comments potentially in early to mid-December. The MPUC will host the scoping meetings after the application is filed.

Lenz introduced the four route alternatives that were considered and rejected in the CN/RP Application. Alternatives 1 and 2 had similar environmental impacts; however, were rejected because they do not utilize existing utility corridors. Alternatives 3 and 4 which are collocated with US Highway 12 and the BNSF Railway, respectively were rejected due to crossing of the Minnesota Department of Natural Resources (MDNR)-managed Danvers Wildlife Management Area (WMA) and USFWS-managed Waterfowl Production Area (WPA) and concerns with collocating with the railroad and highway. The MnDOT also expressed some concerns with snow management along US Highway 12 that may require improvements in the future. If a J-turn or roundabout are required, which can often be accommodated with existing ROW; roundabouts cannot.

Kotch Egstad is working with GIS to ensure that the MPUC project environmental reviews are also incorporated into the MnDOT system so that MnDOT staff have that information available. Kotch Egstad to send over the most recent ENM form for Merjent to develop.

**From:** [Kristin Lenz](#)  
**To:** [Kotch Egstad, Stacy \(DOT\)](#); [Strohfus, Mark GRE-MG](#)  
**Cc:** [Mandy Bohnenblust](#)  
**Subject:** RE: EXTERNAL: RE: Call to discuss Appleton to Benson 115kV - Docket No. 24-264  
**Date:** Wednesday, November 6, 2024 11:45:00 AM  
**Attachments:** [Aligns\\_ROW100ft\\_RouteWidth\\_Preferred\\_Appleton\\_Benson.zip](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)

---

Good morning Stacy,

Please see attached shapefile of the proposed alignment, ROW and MPUC Route Width.

Thanks!

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](http://www.merjent.com)

**From:** Kotch Egstad, Stacy (DOT) <[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)>  
**Sent:** Wednesday, November 6, 2024 7:13 AM  
**To:** Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>  
**Cc:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: RE: Call to discuss Appleton to Benson 115kV - Docket No. 24-264

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Mark,

Thursday, November 14<sup>th</sup> at 1pm works for the attendees I need on my side.

I'd very much appreciate a shapefile prior to the meeting so that we can come to the table with a high-level review of considerations within the project area.

Thank you,

**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

[Large Energy Facility Project Guidance - MnDOT \(state.mn.us\)](#)



**From:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>

**Sent:** Tuesday, November 5, 2024 2:09 PM

**To:** Kotch Egstad, Stacy (DOT) <[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)>

**Cc:** Kristin Lenz (<[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)> <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>); Mandy Bohnenblust (<[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)> <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>)

**Subject:** Call to discuss Appleton to Benson 115kV - Docket No. 24-264

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Stacy,

Kristin and I would like to have a call to talk about our Appleton to Benson 115kV project with you.

Let us know if any of these times work for you and whomever else you'd like to involve. I think one hour should be a good start.

- Wednesday, Nov 13, 9-11 and 2-4.
- Thursday, Nov 14, 9:30-4:30

We can work on getting you a shapefile for the proposed route if you'd like before the meeting.

Thanks,

**Mark Strohfus**

**Project Manager, Transmission Permitting**

**Great River Energy**

12300 Elm Creek Boulevard

Maple Grove, MN 55369-4718

D: 763-445-5210

C: 612-961-9820

[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)

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**From:** [Kotch Egstad, Stacy \(DOT\)](#)  
**To:** [Kristin Lenz](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Monday, September 9, 2024 3:28:43 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[District 4 CHIP 2023-37046039-v1.pdf](#)

---

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

Kristen,

Thank you for reaching out to begin early coordination for the Appleton to Benson 115-kV Transmission Project.

From the map provided, the project appears to have the potential to impact TH 7, TH 9, US 12, and US 59. If you have shapefiles for this project, please send those to me so that me may better identify the project's TH colocation areas.

Attached you'll find the MnDOT District 4 Capital Highway Investment Plan (CHIP) for researching MnDOT construction projects that may affect the timing of your project. Additional construction information for MnDOT District 4 can be found here: [Projects - West Central Minnesota District 4 \(state.mn.us\)](#).

As always, MnDOT welcomes you to host a brief project introduction meeting at your earliest convenience.

Anticipated meeting topics would be:

1. Scope of work
2. Project timeline
3. Available:
  - a. GIS/Non-GIS mapping
  - b. Expected TH colocation areas (within, adjacent, both)
  - c. Known existing utility or other conflicts/constraints
4. Anticipated effects on the state trunk highway system
5. Other state/federal agency coordination to-date
6. Discuss MnDOT Utility ENM (if deemed necessary)

If you care to share a few dates/times within the next couple weeks with your project team availability, I will work to make a Microsoft Teams meeting happen on my end.

Thanks again and please contact me with any questions,

**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

[Large Energy Facility Project Guidance - MnDOT \(state.mn.us\)](#)



**From:** Kristin Lenz <kristin.lenz@merjent.com>

**Sent:** Thursday, September 5, 2024 3:01 PM

**To:** Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>

**Cc:** Strohfus, Mark GRE-MG <MStrohfus@GREnergy.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Stacy:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,

Kristin Lenz on behalf of

Mark Strohfus

Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**

**Senior Project Manager**

612.924.3962 direct

763.913.4740 mobile

[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Brown, Beth A \(DOT\)](#)  
**To:** [Kristin Lenz](#)  
**Cc:** [Dretsche, Gabriel \(DOT\)](#); [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#); [Steffenson, Cade \(BWSR\)](#)  
**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, September 18, 2024 10:08:53 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

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Hi Kristin,

Thanks for reaching out and introducing us to this proposed project.

I just touched base with Stacy Kotch Egstad, MnDOT's Utility Routing & Siting Coordinator, who confirmed you two have been in contact regarding this project. Stacy will be your primary point of contact at MnDOT and will be providing comments on behalf of MnDOT as your early project coordination continues. That will include some comments regarding wetland regulatory compliance where the proposed work intersects MnDOT TH ROW.

Please feel free to contact me with any questions but for now I'll defer to Stacy as our lead for this coordination.

Thanks!

Beth

**Beth Brown (she/her)**  
Wetland Program Coordinator

**MnDOT Office of Environmental Stewardship**  
395 John Ireland Blvd., MS 620, Saint Paul, MN 55155  
[elizabeth.a.brown@state.mn.us](mailto:elizabeth.a.brown@state.mn.us)  
Office (voicemail checked daily): 651-366-4297



---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Thursday, September 5, 2024 3:02 PM  
**To:** Brown, Beth A (DOT) <[elizabeth.a.brown@state.mn.us](mailto:elizabeth.a.brown@state.mn.us)>; Dretsche, Gabriel (DOT) <[gabriel.dretsche@state.mn.us](mailto:gabriel.dretsche@state.mn.us)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GReEnergy.com](mailto:MStrohfu@GReEnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>; Steffenson, Cade (BWSR) <[cade.steffenson@state.mn.us](mailto:cade.steffenson@state.mn.us)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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---

Beth and Gabriel:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

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**Senior Project Manager**  
612.924.3962 direct  
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612.746.3360  
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**From:** [Kotch Egstad, Stacy \(DOT\)](#)  
**To:** [Aukee, Dale GRE-MG](#)  
**Subject:** Appleton - Benson 115kV WO#208103  
**Date:** Thursday, October 26, 2023 7:35:24 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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**This email was sent by an external sender. Opening attachments or clicking links from untrusted sources may cause damage to you and Great River Energy.**

Good Morning, Dale,

I just received the paper notification regarding the Open Houses for your Appleton to Benson 115kV project. I am wondering if there are shapefiles/.kmz files available that you can share with me. If not yet, I'll take them whenever they are available.

Of course, we are open to having an intro meeting when the time is right.

Thank you,

**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  
O: 651-366-4635 (Thur)  
[mndot.gov/](http://mndot.gov/)



**Minnesota State Historic Preservation Office**

November 26, 2024

Lacy Lepisto, Cultural Resource Specialist  
Merjent  
1 Main St SE, Suite 300  
Minneapolis, MN 55414

RE: Appleton to Benson Transmission Line  
Swift County  
SHPO Number: 2025-0092

Dear Lacy Lepisto:

Thank you for the opportunity to comment on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

According to your October 22, 2024 correspondence, the proposed project includes the construction of approximately 27 miles of 115 kV transmission line from the existing Appleton Substation to the existing Benson Substation in Swift County, as well as an additional 1.7 mile 115 kV transmission line to the Benson Municipal Substation. The project also includes the construction of a new Appleton Transmission Substation and new Appleton Distribution Substation. In addition, the applicants propose to decommission the existing collocated Appleton Transmission and Distribution Substation and have identified three (3) potential locations for a new transmission and distribution substation. Applicants may also expand the existing or construct new Moyer and Danvers distribution substations. Improvements are also planned at the existing Shible Lake and Benson Municipal Substations.

We have reviewed the documentation included with your October 22<sup>nd</sup> submission, and we do not agree with the recommendation provided in the Phase IA Cultural Resources Assessment. Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified.

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. 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 have any questions regarding our review of this project, please contact me at 651-201-3285 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,

*Kelly Gragg-Johnson*

Kelly Gragg-Johnson  
Environmental Review Program Specialist

---

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287 [mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■  
[mnshpo@state.mn.us](mailto:mnshpo@state.mn.us)

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

**From:** [MN ADM ENV Review SHPO](#)  
**To:** [Kristin Lenz](#)  
**Subject:** EXTERNAL: Automatic reply: Appleton to Benson Transmission Line Project - New Project Review Request (Email 2 of 2)  
**Date:** Tuesday, October 22, 2024 4:53:06 PM

---

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

Thank you contacting the Minnesota State Historic Preservation Office via the Environmental Review Program mailbox.

If you've submitted a project review request, this message serves as **confirmation** that we have received your email.

**Please Note:** The Environmental Review Team continues to experience a high volume of project submissions, and most review times can take between 45-60 days to complete. Currently, the Team has vacant positions with staff taking on additional responsibilities, and as a result, some reviews may take longer, including our response time to questions and inquiries. As agencies submit projects for review, we ask you please plan for a longer response times from SHPO.

- Please continue to send projects for review to [ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us).
- General environmental review inquiries should be directed to [MNSHPO@state.mn.us](mailto:MNSHPO@state.mn.us) where your request will be redirected to the appropriate SHPO team member.

We value and appreciate your partnership and understand the impacts when there is uncertainty around project timelines. We have made strides recently with the launch of [Minnesota's Statewide Historic Inventory Portal](#) (MnSHIP) allowing greater online access to historic inventories, and we continue to accept electronic project submissions, a change made in 2020 due to the pandemic.

Sincerely,

**Environmental Review Program Team**  
State Historic Preservation Office  
*Minnesota Department of Administration*

For information on submitting projects for review, please visit the [Environmental Review Program Website](#).



p 612.746.3660 ■ f 612.746.3679 ■ [www.merjent.com](http://www.merjent.com)

1 Main Street SE ■ Suite 300 ■ Minneapolis, Minnesota ■ 55414

October 22, 2024

Minnesota State Historic Preservation Office  
Administration Building #203  
50 Sherburne Ave.  
St. Paul, MN 55155  
[ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us)

Re: Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative, and City of Benson (Applicants)  
Appleton to Benson Transmission Line Project  
Phase IA Cultural Resources Assessment (**Contains Confidential Information**)

To Whom it May Concern:

This letter presents the results of a file search completed in support of the Appleton to Benson Transmission Line Project (Project) in Swift County, Minnesota. Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency (WMMPA), Agralite Electric Cooperative (Agralite), and the City of Benson (together, the Applicants) will submit a joint Certificate of Need and Route Permit application in Fall 2024 to the Minnesota Public Utilities Commission (MPUC) for this Project. The Project consists of an approximately 27-mile 115-kilovolt (kV) transmission line from the existing WMMPA-owned Appleton Substation in the City of Appleton, Minnesota, to the existing Great River Energy-owned Benson Substation near the City of Benson in Swift County, Minnesota. An additional 1.7-mile of 115-kV transmission line will also be built to the Benson Municipal Substation.

The Project will also involve construction of a new Appleton Transmission Substation and a new Appleton Distribution Substation. The Applicants propose to decommission the existing collocated Appleton Transmission and Distribution Substation and have identified three potential locations for a new transmission and a new distribution substation in the vicinity of the existing substation. The Applicants may also expand the existing or construct new Moyer and Danvers distribution substations. Improvements will also be made to the existing Shible Lake and Benson Municipal Substations. In addition, Great River Energy will decommission and remove 0.7 miles of the existing AG-BK 115-kV line across the Chippewa River. To assist with Project planning, Merjent, Inc. (Merjent) prepared this letter which includes the results of a file search and recommendations.

Figures 1 and 2 (enclosed) identify the Route Width (also referred to as the Proposed Route), and the transmission centerline (Proposed Alignment) associated with the Project, in addition to the new proposed and existing substation locations. The Route Width is a corridor that encompasses the transmission line centerline and its associated 100-foot-wide right-of-way, and substation locations that will be reviewed by the MPUC. A larger Route Width is assessed to allow for minor routing and siting adjustments during final design to avoid resource impacts and/or to address landowner requests. The final design for the Project will be developed after the MPUC issues the Route Permit and impacts would be limited to the transmission line centerline, 100-foot-wide ROW and substation locations, in addition to temporary construction workspace areas.

In order to adequately address resources that may be affected by the Project, a larger Study Area was created to establish context and understand nearby archaeological site density. The Study Area includes the Project Area plus an additional half-mile buffer on each side of the transmission line. The Study Area crosses the Townships, Ranges, Sections identified in Table 1.

**Table 1. Township, Range and Section of the Study Area**

County	Township	Range	Sections
Swift	120N	42W	2, 3, 4, 5, 6
Swift	120N	43W	1, 2, 3, 9, 10, 15, 16
Swift	121N	39W	5, 6, 7, 8
Swift	121N	40W	1, 2, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 30
Swift	121N	41W	19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30
Swift	121N	42W	23, 24, 25, 26, 31, 32, 33, 34, 35, 36
Swift	121N	43W	35, 36
Swift	122N	40W	36

The Project would involve upgrading approximately 18.3 miles of existing 41.6-kV transmission lines, and the reconductoring or rebuilding of 1.0 mile of an existing 115-kV transmission line. Only 9.5 miles would be new 115-kV transmission line construction; however, 67 percent of the Project route is also collocated<sup>1</sup> with road rights-of-way.

## **REGULATORY FRAMEWORK**

When Project development proceeds, we expect that the Minnesota Field Archaeology Act (Minn. Stat § 138.31-138.42) will apply to the Project. Regardless of specific permits required prior to construction, the Private Cemeteries Act (Minn. Stat § 307.08) will apply.

The Minnesota Field Archaeology Act (Minn. Stat § 138.32-138.42) establishes the Office of the State Archaeologist (OSA); requires licenses to engage in archaeology on nonfederal public land; establishes ownership, custody, and use of objects and data recovered during survey; and requires state agencies to submit development plans to the OSA, Minnesota State Historic Preservation Office (SHPO), and the Minnesota Indian Affairs Council for review when there are known or suspected archaeological sites in the area.

The United States Army Corps of Engineers (USACE) has jurisdiction for the placement of dredged or fill material in waters of the U.S. pursuant to Section 404 of the Clean Water Act (33 U.S.C. § 1344; 33 CFR Part 323). A Section 404 permit would be a federal action associated with the Undertaking that requires compliance with Section 106 of the NHPA and 36 CFR Part 800; this Project may require coverage under a Section 404 Regional General Permit. In addition, Appendix C of 33 CFR Part 325 contains the USACE procedures for the protection of historic properties to fulfill the requirements set forth in the NHPA and other applicable laws.

<sup>1</sup> Collocation is defined as any road or utility located within 50 feet either side of the Proposed Alignment.

Minnesota's Private Cemeteries Act (Minn. Stat § 307.08) affords all human burial grounds and remains older than 50 years and located outside of platted or identified cemeteries protection from unauthorized disturbance. This statute applies to burials on either public or private lands or waters and includes prehistoric Indian burial mounds as well as historic cemeteries.

### **Literature Review**

On January 24, 2023, Merjent retrieved cultural resources site information (archaeological sites and historic structures) and on February 7, 2024, retrieved previous survey files from the SHPO. Merjent Cultural Resource Specialists reviewed archaeological site files on the OSA online portal, historic property files on the Minnesota Statewide Historic Inventory Portal (MnSHIP), and the General Land Office (GLO) maps and available historical aerial photography accessed online through the OSA Portal<sup>2</sup>. Enclosed Figures 1 and 2 show the features discussed below identified during this review.

## **BACKGROUND RESEARCH RESULTS**

### **Previously Recorded Archaeological Resources**

According to the OSA and SHPO files, there is one site within the Study Area, but it does not intersect the Route Width. This site (21SWc) is an alpha site, meaning that it was identified by historic documentation and has not been field-verified by a professional archaeologist. This site is described as a habitation site on the Chippewa River, which was reported by several Benson residents, but has possibly been covered by dredge spoil. According to Google Streetview, this area is a small preserve (Ambush Park) with a short, paved trail located adjacent to the Benson Golf Club. Historic aerial photographs and GLO maps show that this area has remained relatively the same since the 1870s. The GLO map shows a short unnamed trail just south of the site. The site and the unnamed trail are more than 0.4-mile north and east of the proposed Project, and the Project is not within the viewshed of 21SWc (see page 8 of Figure 1). This site will not be impacted by the Project due to distance.

### **Previously Recorded Archaeological Surveys**

One previous archaeological survey is located within the Study Area. Survey MULT-1999-05 was conducted in 1999 for access roads associated with the Alliance Pipeline. This survey is located in Township 121N, Range 40W, Section 12 (see page 8 of Figure 1) and does not occur within the Route Width. It was negative for cultural resources.

### **Previously Recorded Standing Historic Buildings and Structures**

Ninety historic buildings and structures are located within the Study Area, seven of which occur within the Route Width. These structures include the following:

1. The Chicago Milwaukee and St. Paul Railway Company/Chicago Milwaukee St. Paul and Pacific Railroad Company: Hastings and Dakota Division Mainline  
[REDACTED] was constructed between 1872 and 1880 and

<sup>2</sup> OSA Portal. 2023. <https://osa.gisdata.mn.gov/OSAportal>. Accessed January 11, 2024.

follows Highway 212 from Minneapolis to Ortonville [REDACTED]). This property has been surveyed as an individual property, as well as a portion of the larger Chicago Milwaukee and St. Paul Railway Company rail lines. According to SHPO comments from May 4, 2021, this portion is not individually eligible for the NRHP [REDACTED]. However, as a contributing section to the larger rail-line, the property was evaluated as Eligible for listing on the NRHP on May 4, 2021, with a reevaluation on March 8, 2023 with concurring results [REDACTED]. It follows Highway 212 from Minneapolis to Ortonville [REDACTED]. The Route Width, but no permanent Project components, overlap a brief segment of this property, which is collocated with existing utilities, and is intersected by an existing foreign transmission line. Additionally, the Project will not result in an appreciable change in viewshed.

2. The Proposed Route parallels [REDACTED] (Trunk Highway 7 aka State Highway 7 SW) for approximately 0.5 mile within [REDACTED]. The Proposed Alignment intersects [REDACTED] at 215<sup>th</sup> Ave SW [REDACTED]. Trunk Highway 7 was constructed in 1921 and stretches from Trunk Highway 28 in Beardsley to Trunk Highway 100 in St. Louis Park. [REDACTED] was determined Not Eligible for the NRHP on October 23, 2020.
3. The Proposed Alignment intersects [REDACTED] (Trunk Highway 59 aka U.S. Highway 59) within in [REDACTED] at intersection with 60<sup>th</sup> St SW. Trunk Highway 59 was constructed in 1935 [REDACTED]. [REDACTED] was determined Not Eligible for the NRHP on July 13, 2022.
4. [REDACTED] occurs within the Proposed Route within T121N R40W Section 1 [REDACTED]. The structure is described as an outbuilding associated with other nearby farmstead-related structures [REDACTED]. This structure has not been evaluated for the NRHP; however, according to aerial photographs, all three structures have been razed and are no longer located at this location.
5. The Proposed Route parallels [REDACTED] (Trunk Highway 12 aka U.S. Highway 12) for approximately 0.5 mile within T121N R40W, Sections 11 and 12, and the Proposed Alignment intersects [REDACTED] within T121N R40W Section 1 at County Road 3 [REDACTED]. The Proposed Alignment intersects [REDACTED] again within T121N R39W, Section 6 [REDACTED]. Trunk Highway 12 was constructed in 1921 and stretches from Lake St. Croix in Lakeland to the Minnesota-South Dakota border near Ortonville. [REDACTED] was determined Not Eligible for the NRHP on October 23, 2020.

6. [REDACTED] (Trunk Highway 9) occurs within the Proposed Route within [REDACTED]. [REDACTED] Trunk Highway 9 was constructed in [REDACTED] 1921 and stretches from Kandiyohi County north to Wilkin County. [REDACTED] was determined Not Eligible for the NRHP on January 5, 2021.
7. [REDACTED] occurs within the Proposed Route [REDACTED]. The structure is described as a single-family dwelling constructed in 1890. This structure has not been evaluated for the NRHP; however, according to aerial photographs, this structure was located in the railroad ROW and has been razed and is no longer located at this location.

The remaining 83 historic buildings and structures will not be impacted due to distance from the Project. The remaining buildings and structures include additional transportation-related structures, farmsteads, homesteads, commercial buildings, and a variety of park-related structures. Three of these buildings are listed on the NRHP, and two are recommended as eligible for listing on the NRHP:

1. The Swift County Courthouse [REDACTED] was constructed in 1897 and was listed on the NRHP on September 19, 1977. It is located [REDACTED] [REDACTED] approximately 0.2 mile from the Project; no Project components overlap with or are visible from the Swift County Courthouse [REDACTED]
2. The Church of St. Francis Xavier [REDACTED] was constructed in 1917 and was listed on the NRHP on August 15, 1985. It is located [REDACTED] [REDACTED] approximately 0.4 miles from the Project; no Project components overlap with or are visible from the Church of St. Francis Xavier [REDACTED]
3. The Episcopal Christ Church [REDACTED] was constructed in 1879 and was listed on the NRHP on August 15, 1985. It is located [REDACTED] [REDACTED] approximately 0.3 mile from the Project; no Project components overlap with or are visible from the Episcopal Christ Church (see page 8 of Figure 1).
4. The Benson Public Library [REDACTED] was constructed in 1913 and evaluated as eligible for the NRHP on January 23, 1992; however, according to Benson City Staff, the library was demolished in 1994 (see page 8 of Figure 1).

The majority of the remaining buildings are located among non-historic buildings within Benson; therefore, they do not have a direct line-of-sight to the current Project, which will not result in an appreciable change to viewshed for buildings and structures within Benson. Additionally, the Project is collocated with existing utility and road rights-of-way near these structures and will not result in an appreciable change in viewshed for buildings and structures outside of Benson.

**Table 2. Historic Sites Located in the Study Area and NRHP Status**

Property Number/Name	Property Category	Location (TRS)	NRHP Status	Figure 1 Map Page Reference
SW-BEN-00002	Building		Unevaluated	
SW-BEN-00004	Building		Unevaluated	
SW-BEN-00005	Building		Unevaluated	
SW-BEN-00006	Building		Unevaluated	
SW-BEN-00007	Building		Unevaluated	
SW-BEN-00008	Building		Unevaluated	
SW-BEN-00009	Building		Unevaluated	
SW-BEN-00010	Building		Unevaluated	
SW-BEN-00011	Building		Unevaluated	
SW-BEN-00012	Building		Unevaluated	
SW-BEN-00013	Building		Listed	
SW-BEN-00014	Building		Unevaluated	
SW-BEN-00015	Building		Listed	
SW-BEN-00018	Building		Unevaluated	
SW-BEN-00019	Building		Unevaluated	
SW-BEN-00020	Building		Unevaluated	
SW-BEN-00021	Building		Unevaluated	
SW-BEN-00022	Building		Listed	
SW-BEN-00023	Building		Not Eligible	
SW-BEN-00024	Building (razed)		Eligible	
SW-BEN-00026	Building		Unevaluated	
SW-BEN-00027	Building		Unevaluated	
SW-BEN-00028	Building		Unevaluated	
SW-BEN-00029	Building		Not Eligible	
SW-BEN-00030	Building		Unevaluated	
SW-BEN-00031	Building		Unevaluated	
SW-BEN-00032	Building		Unevaluated	
SW-BEN-00033	Building		Unevaluated	
SW-BEN-00034	Building		Unevaluated	
SW-BEN-00035	Building		Unevaluated	
SW-BEN-00037	Building		Unevaluated	
SW-BEN-00038	Building		Unevaluated	
SW-BEN-00039	Building		Unevaluated	
SW-BEN-00040	Building		Not Eligible	
SW-BEN-00042	Building		Unevaluated	
SW-BEN-00043	Building		Unevaluated	
SW-BEN-00044	Building		Unevaluated	
SW-BEN-00045	Building		Unevaluated	
SW-BEN-00046	Building		Unevaluated	
SW-BEN-00047	Building		Unevaluated	
SW-BEN-00048	Building		Unevaluated	
SW-BEN-00049	Building		Unevaluated	
SW-BEN-00050	Building		Unevaluated	

Property Number/Name	Property Category	Location (TRS)	NRHP Status	Figure 1 Map Page Reference
SW-BEN-00052	Building		Unevaluated	
SW-BEN-00053	Building		Unevaluated	
SW-BEN-00055	Building		Unevaluated	
SW-BEN-00056	Site		Unevaluated	
SW-BEN-00057	Building		Unevaluated	
SW-BEN-00058	Building		Unevaluated	
SW-BEN-00059	Building		Not Eligible	
SW-BEN-00060	Building		Unevaluated	
SW-BEN-00061	Building		Unevaluated	
SW-BEN-00062	Homestead		Unevaluated	
SW-BEN-00063	Building		Unevaluated	
SW-BEN-00064	Outbuilding		Unevaluated	
SW-BEN-00065	Farmstead		Unevaluated	
SW-BEN-00066	Building		Unevaluated	
SW-BEN-00067	Barn		Unevaluated	
SW-BEN-00069	Park		Unevaluated	
SW-BEN-00070	School		Unevaluated	
SW-BEN-00071	Bathroom building		Unevaluated	
SW-BEN-00072	Shelter		Unevaluated	
SW-BEN-00073	Shelter		Unevaluated	
SW-BEN-00074	Kiosk		Unevaluated	
SW-BEN-00075	Historic marker		Unevaluated	
SW-BEN-00076	Park caretaker building		Unevaluated	
SW-BEN-00077	Storage shed		Unevaluated	
SW-BEN-00078	Miniature golf course		Unevaluated	
SW-BEN-00079	Playground structures		Unevaluated	
SW-BEN-00080	Farmstead		Unevaluated	
SW-BEN-00081	Barn		Unevaluated	
SW-BEN-00082	Commercial building		Unevaluated	
SW-BEN-00083	Veterinary office		Unevaluated	
SW-BEN-00084	Building		Unevaluated	
SW-BEN-00089	Structure		Not Eligible	
SW-BEN-00090	Structure		Not Eligible	
SW-BEN-00091	Building		Unevaluated	
SW-DAN-00001	Church		Unevaluated	
SW-DAN-00002	Building		Unevaluated	
SW-DAN-00003	House		Unevaluated	
SW-HOL-0008	Culvert		Unevaluated	
SW-KER-00001	House		Unevaluated	
SW-SIX-00003	Structure		Not Eligible	
XX-ROD-00053	Structure		Not Eligible	
XX-ROD-00060	Structure		Not Eligible	
XX-ROD-00111	Structure		Not Eligible	
XX-ROD-00151	Structure		Not Eligible	

Property Number/Name	Property Category	Location (TRS)	NRHP Status	Figure 1 Map Page Reference
XX-ROD-00168	Structure	[REDACTED]	Not Eligible	[REDACTED]
XX-RRD-CSP010	Structure	[REDACTED]	Eligible	[REDACTED]
XX-RRD-CSP012	Structure	[REDACTED]	Unevaluated	[REDACTED]

Notes: Gray highlight indicates site is intersected by the Route Width.

{...NONPUBLIC DATA ENDS HERE}

#### General Land Office and Aerial Photo Review

Merjent reviewed nineteenth-century GLO maps and notes on file with the Bureau of Land Management<sup>3</sup>. The GLO map of the Project Area illustrated conditions in 1870 as being prairie, with many lakes and wetlands and connecting streams and rivers. Aerial photographs from 1938 show that roads and the railroad have been constructed and farms have been established, with agricultural fields dominating the landscape. Subsequent historic and modern aerial photographs show that the landscape of the Project area has remained largely the same since that time, with roads being the main addition to the area.

#### SUMMARY AND RECOMMENDATIONS

One archaeological site and 90 historic buildings and structures were identified within the Study Area; seven historic structures are intersected by the Project Width but will not be impacted due to Project activities. There is potential for Historic-period sites within the Project area because the area has been inhabited at least since the 1930s; however, given that the Project consists of upgrading or rebuilding existing overhead transmission lines over 67 percent of the route, and is collocated with disturbed road rights-of-way for 68 percent of the route, there is a low potential for intact historic sites. Mn Model4 indicates that the Project's Area of Potential Effect has a low site potential, and although no survey has occurred in the areas impacted by the Project, the larger general area has been well surveyed. The Project area could contain precontact sites given its location near several water sources. Given that the Project is located in an area with several existing overhead distribution lines and will be constructed along and within areas of previous disturbance such as existing rights-of-way and agricultural fields, Merjent recommends no survey required ahead of Project construction.

<sup>3</sup> Bureau of Land Management General Land Office Records. 2024. <https://glorecords.blm.gov/>

If human remains are encountered during construction activities, all ground disturbing activity must cease, and local law enforcement must be notified per Minn. Stat § 307.08. The Applicants will also develop an Unanticipated Discoveries Plan for the Project.

If you have any questions regarding this memorandum, please do not hesitate to contact me ([lacy.lepisto@merjent.com](mailto:lacy.lepisto@merjent.com)).

Sincerely,  
Merjent, Inc.



Lacy Lepisto  
Cultural Resource Specialist

Enclosed:

Figure 1 Topographic Map (*Contains Confidential and Privileged Information*)  
Figure 2 Aerial Map (*Contains Confidential and Privileged Information*)

cc: Mark Strohfus, Great River Energy  
Kristin Lenz, Merjent  
Bill Harding, Merjent

**PUBLIC DOCUMENT - NONPUBLIC DATA HAS BEEN EXCISED**

**FIGURES HAVE BEEN EXCISED FROM THIS DOCUMENT  
DUE TO THE CONFIDENTIAL NATURE OF THE CONTENT**

**Minnesota Board of Water and Soil Resources**

**From:** [Swenson, Karli \(BWSR\)](#)  
**To:** [Kristin Lenz](#)  
**Cc:** [VanThuyne, Dusty \(He/Him/His\) \(BWSR\)](#); [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#); [Jordet, Peter \(BWSR\)](#)  
**Subject:** RE: EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Wednesday, September 25, 2024 9:53:22 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image006.png](#)  
[RIM Easement Info.zip](#)  
[EasementAlterationPolicy\\_Attachment.pdf](#)

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Kristin,

I have attached some info related to 4 RIM easements that would be intersected by the transmission line, 100 ft ROW or Route Width according to the shapefiles you provided. I have included shapefiles of all 4 RIM easement boundaries, copies of the recorded easement documents and a summary of the overlap for each easement. There was one easement that was not previously identified, and one easement you identified we determined there is no overlap. The boundaries included herein may be slightly different than what is shown in the RIM public boundary layer. We reviewed each boundary and associated legal description, and made some minor adjustments based on current parcel data.

All in all, there is only one easement where the proposed centerline itself intersects a RIM easement. The summary notes explain the acres of overlap of the ROW and Route Width.

We would be ok with ROW overlap, as long as the vegetation on the RIM easement would remain the same as in the associated conservation plan. Any permanent surface impacts within the easement area, such as vegetation destruction, permanent structures, permanent access roads, etc, would require an easement alteration proposal to release the area of impact. I've attached our Easement Alteration Policy for your review. For easements where the poles/towers are placed within the RIM easement, we would require release of the entire ROW. It would be best to avoid locating towers within the RIM easement if another route is feasible.

Payment to BWSR for acres released would be 2x the current RIM payment rate for the township where the easement is located.

Let me know if you have any questions at this time.

Thank you!

**Karli Swenson | Conservation Easement Specialist**  
Minnesota Board of Water and Soil Resources (BWSR)  
520 Lafayette Road North  
St. Paul, MN 55155  
**651-440-2456**

---

**From:** Kristin Lenz <kristin.lenz@merjent.com>

**Sent:** Friday, September 13, 2024 10:40 AM

**To:** Swenson, Karli (BWSR) <[karli.swenson@state.mn.us](mailto:karli.swenson@state.mn.us)>

**Cc:** VanThuyne, Dusty (He/Him/His) (BWSR) <[dusty.vanthuyne@state.mn.us](mailto:dusty.vanthuyne@state.mn.us)>; Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** RE: EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Good morning Karli,

Thanks for your response. I've attached the shapefiles of the Route Width, transmission line centerline and 100-foot-wide ROW. The Minnesota Public Utilities Commission (MPUC) will assess potential impacts within a larger "Route Width" that would allow the proposed centerline and associated 100-foot-wide right-of-way to be adjusted as needed to avoid resource impacts or to address landowner concerns. At this stage of the Project, we are preparing a Certificate of Need and Route Permit Application (Application) for the MPUC. The MPUC will use that information to prepare an Environmental Assessment (EA) that assesses the environmental impacts of the Proposed Route and potential route alternatives. The EA will be used by the Commissioners to inform a decision on the final route. Great River Energy will then develop a final transmission line design within the final route selected by the Commission.

We have reviewed the legal descriptions and were hoping you can help us understand the boundaries of the easements and also if there any restrictions on activities, like vegetation clearing that you mentioned. We have the publicly available shapefile of BWSR easements, but based on the legal descriptions, I think at least one of them appears to be a bit smaller.

Thank you!

Kristin

**Kristin Lenz**

**Senior Project Manager**

612.924.3962 direct

763.913.4740 mobile

[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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---

**From:** Swenson, Karli (BWSR) <[karli.swenson@state.mn.us](mailto:karli.swenson@state.mn.us)>

**Sent:** Friday, September 13, 2024 9:47 AM

**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Cc:** VanThuyne, Dusty (He/Him/His) (BWSR) <[dusty.vanthuyne@state.mn.us](mailto:dusty.vanthuyne@state.mn.us)>; Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Hi Kristen,

Thank you for reaching out about this project. It would be helpful if you could provide us a shapefile of the proposed route so we can see how it intersects our RIM easement boundaries using GIS. Some overlap of right-of-way along the edge of an easement might be ok, as long as there would not be any permanent impacts to the RIM easement area, such as tree removal, permanent structures, access roads, etc. Our easements also require restoration of vegetative cover after any temporary impacts that may occur during construction. We would need to get a better idea of the specific location of the lines, poles and right-of-way to determine if we need to take additional steps to release any areas of permanent impact from the RIM easement which would require a formal easement alteration request and compensation to the State for any areas ultimately released from RIM.

**Karli Swenson | Conservation Easement Specialist**

Minnesota Board of Water and Soil Resources (BWSR)

520 Lafayette Road North

St. Paul, MN 55155

**651-440-2456**

---

**From:** VanThuyne, Dusty (He/Him/His) (BWSR) <[dusty.vanthuyne@state.mn.us](mailto:dusty.vanthuyne@state.mn.us)>

**Sent:** Thursday, September 5, 2024 3:19 PM

**To:** Swenson, Karli (BWSR) <[karli.swenson@state.mn.us](mailto:karli.swenson@state.mn.us)>

**Subject:** FW: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

Hi Karli –

Is this request something you would handle, or should I send it elsewhere?

Thank you,

**Dusty Van Thuyne | Easement Programs Coordinator**

Minnesota Board of Water and Soil Resources (BWSR)

520 Lafayette Road North

St. Paul, MN 55155

O: 651.539.2573 **NEW NUMBER**



---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Sent:** Thursday, September 5, 2024 3:07 PM

**To:** VanThuyne, Dusty (He/Him/His) (BWSR) <[dusty.vanthuyne@state.mn.us](mailto:dusty.vanthuyne@state.mn.us)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Dusty Van Thuyne:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the Proposed Route. Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of  
Mark Strohfus  
Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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## **Swift County**

**From:** [Kody Fossum](#)  
**To:** [Kristin Lenz](#); [Christiansen, Dilan T \(BWSR\)](#)  
**Cc:** [Steffenson, Cade \(BWSR\)](#); [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN  
**Date:** Thursday, September 12, 2024 2:02:18 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

---

Perfect, thank you very much Kristin!

Kody

**Kody Fossum**  
*County Drainage Ditch Inspector*  
*County Parks Supervisor*  
*County Wetlands LGU*



>Main: 320.843.5341  
Cell: 320.269.1505  
Email: [kody.fossum@co.swift.mn.us](mailto:kody.fossum@co.swift.mn.us)

[Website](#) [Facebook](#)

---

**From:** Kristin Lenz <kristin.lenz@merjent.com>  
**Sent:** Thursday, September 12, 2024 2:00 PM  
**To:** Christiansen, Dilan T (BWSR) <Dilan.T.Christiansen@state.mn.us>; Kody Fossum <kody.fossum@swiftnm.us>  
**Cc:** Steffenson, Cade (BWSR) <cade.steffenson@state.mn.us>; Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Good afternoon Dilan and Kody,

Thank you for the update, we have updated our contact information accordingly.

At this stage of the Project, we are preparing a Certificate of Need and Route Permit Application (Application) for the Minnesota Public Utilities Commission (MPUC) that assesses

potential impacts within a larger “route width” that would allow the proposed centerline and associated 100-foot-wide right-of-way to be adjusted as needed to avoid resource impacts or to address landowner concerns. Our Application will also assess route alternatives that have been considered and rejected. The MPUC will use that information to prepare an Environmental Assessment (EA) that assesses the environmental impacts of the Proposed Route and potential route alternatives. The EA will be used by the Commissioners to inform a decision on the final route. Great River Energy will then develop a final transmission line design within the final route selected by the Commission, and will pursue any necessary wetland permitting, including USACE Section 404 permitting. We will provide further information on potential wetland impacts associated with the final route at that time.

Thank you!

Kristin

**Kristin Lenz**

**Senior Project Manager**

612.924.3962 direct

763.913.4740 mobile

[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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---

**From:** Christiansen, Dilan T (BWSR) <[Dilan.T.Christiansen@state.mn.us](mailto:Dilan.T.Christiansen@state.mn.us)>

**Sent:** Monday, September 9, 2024 8:40 AM

**To:** Kody Fossum <[kody.fossum@swiftn.us](mailto:kody.fossum@swiftn.us)>; Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Cc:** Steffenson, Cade (BWSR) <[cade.steffenson@state.mn.us](mailto:cade.steffenson@state.mn.us)>; Strohfus, Mark GRE-MG

<[MSstrohfu@GREnergy.com](mailto:MSstrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohenblust@merjent.com](mailto:mandy.bohenblust@merjent.com)>

**Subject:** EXTERNAL: RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Good morning,

Thank you for forwarding that over Kody. Yes I agree, we would want some information on the wetland impacts for the lines and the substations.

**Dilan Christiansen | Wetland Specialist**

Minnesota Board of Water and Soil Resources (BWSR)

Phone: (320)407-3640

[Dilan.T.Christiansen@state.mn.us](mailto:Dilan.T.Christiansen@state.mn.us)

---

**From:** Kody Fossum <[kody.fossum@swiftn.us](mailto:kody.fossum@swiftn.us)>  
**Sent:** Thursday, September 5, 2024 4:35 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Steffenson, Cade (BWSR) <[cade.steffenson@state.mn.us](mailto:cade.steffenson@state.mn.us)>; Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>; Christiansen, Dilan T (BWSR) <[Dilan.T.Christiansen@state.mn.us](mailto:Dilan.T.Christiansen@state.mn.us)>  
**Subject:** RE: Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Good Afternoon Kristin,

Cade Steffenson has moved to a different district for wetlands. Dilan Christiansen is Swift County's BWSR Rep. I have Cc'd Dilan on this email. Mark seeing that you are attached to this thread could you please share with Dilan and I an potential wetland impacts or crossings along with which side of the road the proposed line is to be set. I am also the county ditch inspector and the proposed path crosses both county open bottom ditches and county tiles.

Thank you,

Kody

**Kody Fossum**  
*County Drainage Ditch Inspector  
County Parks Supervisor  
County Wetlands LGU*



>Main: 320.843.5341  
Cell: 320.269.1505  
Email: [kody.fossum@co.swift.mn.us](mailto:kody.fossum@co.swift.mn.us)

[Website](#) [Facebook](#)

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Sent:** Thursday, September 5, 2024 2:47 PM  
**To:** Kody Fossum <[kody.fossum@swiftn.us](mailto:kody.fossum@swiftn.us)>  
**Cc:** [cade.steffenson@state.mn.us](mailto:cade.steffenson@state.mn.us); Strohfus, Mark GRE-MG <[MStrohfu@GRENergy.com](mailto:MStrohfu@GRENergy.com)>; Mandy

Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** Appleton to Benson 115-kV Transmission Line Project in Swift County, MN

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Kody Fossum:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative and City of Benson (together, the Applicants) are proposing to construct approximately 29 miles of new 115-kilovolt (kV) high voltage transmission line (HVTL) from the City of Appleton to the City of Benson in Swift County, Minnesota, referred to as the Appleton to Benson 115-kV Transmission Line Project (Project). The Applicants intend to submit a Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in Fall 2024. The Applicants anticipate starting construction in Fall/Winter 2028 and energizing the Project in 2030.

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Regards,

Kristin Lenz on behalf of

Mark Strohfus

Project Manager, Great River Energy Transmission Permitting

**Kristin Lenz**

**Senior Project Manager**

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## **State Legislature**

**From:** [Aukee, Dale GRE-MG](#)  
**To:** [Becker, Cory](#)  
**Subject:** RE: Appleton Transmission Line project Open House

---

Thank you Cory. I look forward to meeting you. If you have any questions prior to the meeting please let me know.

Dale Aukee, SR/WA  
Sr. Field Representative, Land Rights

Great River Energy  
12300 Elm Creek Blvd  
Maple Grove, MN 55369  
Direct 763-445-5978  
Cell 612-840-4019

---

**From:** Becker, Cory <[Cory.Becker@mail.house.gov](mailto:Cory.Becker@mail.house.gov)>  
**Sent:** Tuesday, October 24, 2023 12:03 PM  
**To:** Aukee, Dale GRE-MG <[DAukee@GREnergy.com](mailto:DAukee@GREnergy.com)>  
**Subject:** Appleton Transmission Line project Open House

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Good afternoon Dale,

My name is Cory Becker and I am work for Congresswoman Michelle Fischbach. I wanted to send an email today and introduce myself, and let you know that I am planning to attend the Appleton Open House next Wednesday, November 1<sup>st</sup>.

I look forward to learning more about the project.

Best,

Cory Becker  
District Outreach Representative  
Congresswoman Michelle Fischbach (MN – 07)  
507-517-8665

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