

Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40



May 14, 2014

The Honorable Steve Mihalchick
Office of Administrative Hearings
P.O. Box 64620
600 North Robert Street
St. Paul MN 55164-0620

Re: Application of Minnesota Power for a Route Permit for the Canisteo 115 Kilovolt High Voltage Transmission Line (HVTL) Project in Itasca County
Public Utilities Commission (PUC) Docket Number: E-015/TL-13-805
Office of Administrative Hearings (OAH) Docket Number: 48-2500-31336
ERDB Number: 20140042

Dear Judge Mihalchick:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application and Environmental Assessment for the Canisteo 115 kV Transmission Line project in Itasca County. Previously the DNR submitted the enclosed comment letters dated January 3, 2014 and March 21, 2014 to the Department of Commerce regarding Scoping for the Environmental Assessment. Please consider these enclosures part of the Office of Administrative Hearings record for this project. It is also notable that the DNR has worked collaboratively with Minnesota Power regarding a draft of their Noxious Weeds and Invasive Species Control Plan and a work plan for a rare plant survey. The following comments remain in addition to those previously provided.

In T56N R24W Sections 8 & 17, the proposed route traverses an area that the Minnesota Biological Survey has preliminarily identified as a Site of Moderate Biodiversity Significance. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Sites ranked as Moderate contain occurrences of rare species and/or moderately disturbed native plant communities, and/or landscapes that have a strong potential for recovery. Preliminary sites are subject to change, including changes to boundaries and rankings. Typically, the DNR requests that disturbance within Sites of Moderate Biodiversity Significance be minimized to the extent feasible. Actions to minimize disturbance may include, but are not limited to, the following recommendations:

- As much as possible, operate within already-disturbed areas;
- Minimize vehicular disturbance in the area;
- Do not park equipment or stockpile supplies in the area;
- Do not place spoil within MBS Sites or other sensitive areas;
- Inspect and clean all equipment prior to bringing it to the site to prevent the introduction and spread of invasive species;
- If possible, conduct the work under frozen ground conditions;



- Use effective erosion prevention and sediment control measures;
- Re-vegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible; and
- Use only weed-free mulches, topsoils, and seed mixes.

Thank you for the opportunity to provide comments regarding the Canisteo 115 kV Transmission Line project in Itasca County. Please contact me with any questions.

Sincerely,



Jamie Schrenzel
Principal Planner
Environmental Review Unit
(651) 259-5115

Enclosures: 2

cc: Michael Kaluzniak, Minnesota Public Utilities Commission
Bill Storm, Minnesota Department of Commerce
Daniel McCourtney, Minnesota Power