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November 30, 2015

Tricia DeBleeckere, Energy Facilities Planner
Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Motley Area 115 kV Transmission Line Project in Morrison, Cass and Todd Counties, Minnesota
Public Utilities Commission (PUC) Docket Numbers: ET2, E015/CN-14-853
ET2, E015/TL-15-204
Office of Administrative Hearings (OAH) Docket Number: 19-2500-32714

Dear Ms. DeBleeckere:

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) and Application for the Motley Area 115 kV Transmission Line Project and provides the following comments for your consideration.

Routing

The DNR would support the Old Tree Avoidance Alternative that utilizes the existing MP 34.5 kV sub-transmission line right-of-way to avoid impacts to a large American elm located within the proposed route.

The MP Land East River Crossing Alternative would appear to result in less impacts natural resources as it would utilize more existing disturbed corridors and there is an existing power line crossing of the Crow Wing River in that location. This alternative would reduce forestry and wetland impacts when compared to the West Route Option. In addition, the East River Crossing Alternative would not intersect native plant communities. The West Option Route would intersect a Moderate site of Biodiversity Significance. The East River Crossing Alternative would result in an additional public water crossing over Sevenmile Creek. The DNR would require construction and maintenance conditions to minimize impacts to this crossing as part of the License to Cross Public Lands and Waters.

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Suggested Requirements and Construction Practices

Vegetation removal is proposed to be minimized. The DNR recommends that wire-zone/border-zone vegetation removal and management is required in the Route Permit for the entire route. The concept differentiates between the wire zone directly under the conductors and the remaining border zone within the ROW and generally allows for different, yet compatible, vegetation types in these separate zones.

Wire Zone: Area directly underneath the conductors, including potential conductor sway. Vegetation in this zone consists of low-growing forbs and grasses.

Border Zone: Area that begins at the outside edge of the wire zone and extends to the edge of the easement or other right of way. This zone may contain additional low-growing woody plants and trees.

This would minimize fragmentation impacts on wildlife. This is required for public waters crossings in accordance with Minnesota Rules 6135. To the extent feasible, a vegetation buffer should be maintained at all water crossings during construction, particularly at the Crow Wing River crossing.

Invasive species management is recommended for the entire route. Disturbed ground and materials brought in onsite may result in the spread of invasive species. Best management practices should be followed to avoid the transport of invasive species. Disturbed ground should be reseeded immediately following disturbance or a cover crop should be used.

As mentioned in the EA, impacts associated with construction and maintenance activities at public water crossings, wetlands, and other water body crossings should be minimized to the extent possible. Construction activities that require physical crossings should occur during the winter when the ground is frozen.

The EA identifies that the Applicants would work with the DNR on identifying areas along the selected route where bird flight diverters should be placed. The DNR supports this action and looks forward to working with the Applicant during future project planning.

Rare and Unique Natural Resources

Impacts to native plant communities and rare and unique natural resources along the Common Route should be minimized as per the recommendations provided in scoping (see enclosure) and as included in the EA. This includes utilizing existing ROWs to the extent possible. According to the EA, the proposed common alignment to the west of U.S. Highway 10 ROW would impact less Sites of Biodiversity and has less potential for impacts to rare and unique natural resources than the East of U.S. Highway 10 Alternative. This also includes utilizing mitigation measures included in the EA for Blanding's turtles.

Table 17 of the EA should state "Rare and Unique Species within a mile of the Project Area."

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It should be noted that the EA incorrectly states the status of beach heather as Special Concern. Beach heather is state-listed as Threatened.

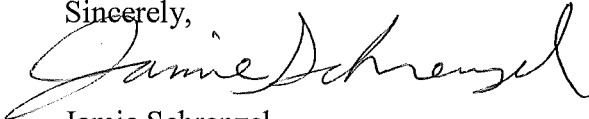
It should also be noted when reviewing the EA that the Basswood – Black Ash Forest is a rare native plant community with a conservation status rank of S3, indicating that it is vulnerable to extirpation within Minnesota.

Enclosure

Please also see the attached DNR comment letter to the Department of Commerce regarding the Motley Area Transmission Application dated June 3, 2015. Please enter these comments into the Office of Administrative Hearings record.

Thank you for the opportunity to provide comments. Please contact me with any questions.

Sincerely,



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

Enclosure: 1

cc: Administrative Law Judge Jeff Oxley, Office of Administrative Hearings
Richard Davis, Department of Commerce
Rick Heuring, Great River Energy

