



May 26, 2016

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

Re: In the Matter of the Application by Great River Energy and Minnesota Power for Route Permit for a 115 kV Transmission Line near Motley, Minnesota  
PUC Docket Number/s: ET2, E015/TL-15-204

Dear Ms. DeBleeckere:

The Minnesota Department of Natural Resource (DNR) has reviewed proposed minor alterations for the Motley Transmission Line Project. Please consider the following comments regarding Minor Alteration 2.

Unlike the originally permitted substation site, Minor Alternation 2 is within a Central Region Regionally Significant Ecological Area ranked Outstanding. Please see Figure 1 and Figure 3 depicting the boundary of the Central Region Regionally Significant Ecological Area.

The Minor Alteration 2 substation site is also directly north of and adjacent to a Minnesota Biological Survey (MBS) Site of Moderate Biodiversity Significance. Please see Figure 2 depicting the MBS sites in the vicinity of the site.

The Minor Alteration 2 site is north of a National Wetland Inventory (NWI) wetland classified as Type 6 (shrub/swamp). The minor alteration request states that impacts are not anticipated to the natural environment. However, until delineated, it is not clear whether there would be wetland impacts because sometimes wetland delineations differ from NWI estimated delineations.

Other site alternatives to consider for limiting natural resource impacts would be an agricultural field to the northwest of the existing substation and intersection, or the area directly south and adjacent to the existing substation (see Figure 3 for approximate locations). The agricultural site would have the least expected impacts. The option to the south of the existing substation would involve tree clearing, but would minimize encroachment to the Central Region Regionally Significant Ecological Area of Outstanding ranking. The project developer could also further explore ways to remain within the permitted site.

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



Thank you for your consideration of these recommendations. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Schrenzel". The signature is fluid and cursive, with a prominent vertical stroke at the end.

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

Enclosures: 3

cc: Rich Davis, Minnesota Department of Commerce  
Rick Heuring, Great River Energy

Figure 1 – Boundary of Central Region Regionally Significant Ecological Area (green) in vicinity of Minor Alteration 2.





**Figure 2 – Minnesota Biological Survey (MBS) Sites of Biodiversity Significance near Substation Site (red) and Minor Alteration 2 Site (yellow).**

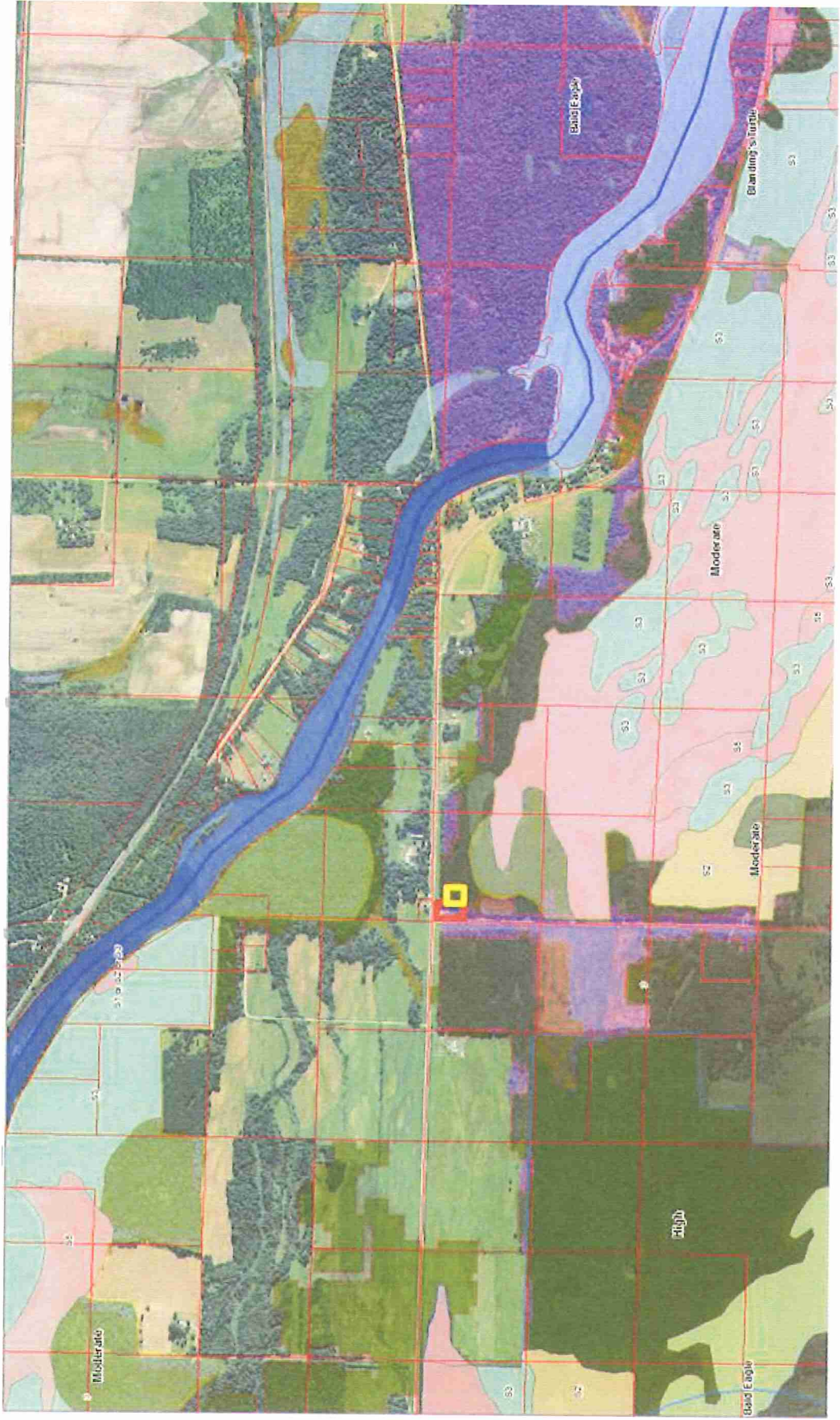




Figure 3 – Alternate Locations to Consider for the Motley Transmission Substation.

