

June 16, 2023

Honorable Suzanne Todnem  
Minnesota Office of Administrative Hearings  
P.O. Box 64620  
Saint Paul, MN 55164-0620

RE: In the Matter of the Application of Great River Energy for a Route Permit to Rebuild the Existing 69kV ST-WW Transmission Line to 115kV in Stearns County, Minnesota

OAH Docket 23-2500-38942  
MPUC ET-2/TL-22-235

Judge Todnem,

The Department of Commerce, Energy Environmental Review and Analysis (EERA) has reviewed the *Proposed Findings of Fact and Conclusion of Law* filed on June 6, 2023, by Great River Energy (GRE or Applicant).<sup>1</sup> EERA provides the following response.

#### *Draft Site Permit*

EERA largely supports the *Proposed Findings of Fact* submitted by GRE except for special permit conditions in the Draft Site Permit.

Regarding special permit condition 6.3 Vegetation Management Plan (VMP), EERA agrees that landowner preference is an important and reasonable consideration for any transmission line project. However, EERA believes it is not appropriate to include such preferences in the permit condition. EERA does support inclusion of landowner preferences as a goal of the VMP, with supporting objectives. Incorporating landowner preference as a goal allows GRE to support landowners along the transmission line route, while allowing for the flexibility, adaptability, and differences across landowners through specific management objectives. This option is also consistent with other vegetation management plans, where landowner preferences can include visual screening, disposal or use of trees and woody debris removed from private property, and other site-specific restoration activities requested by landowners.<sup>2</sup>

EERA recommends the following permit language:

#### **6.3 Vegetation Management Plan**

The Permittee shall develop a vegetation management plan in coordination with EERA and DNR. The vegetation management plan and documentation of the coordination efforts between the permittee

---

<sup>1</sup> *Great River Energy Reply Comments--St-Ws Reply Comments with Proposed Findings of Fact*, June 6, 2023, eDockets No. [20236-196407-01](#).

<sup>2</sup> *See Aurora Solar Revised Vegetation Management Plan, April 10, 2020, e-dockets No. [20204-161984-01](#).*

and the coordinating agencies shall be filed at least 14 days prior to the plan and profile for the project. The Permittee shall provide all affected landowners with copies of the plan.

The vegetation management plan must include the following:

- Management objectives addressing short term (seeding and establishment) and long-term goals (life of the project).
- A description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used.
- A description of tree removal/planting activities and the timing of such activities.
- A description of how the site will be monitored and evaluated to meet management goals.
- A description of the management tools used to maintain vegetation (e.g., mowing, spotspraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities.

EERA believes that building landowner goals and associated objectives into the VMP allows GRE to meet their goal of accommodating landowner requests for site restoration along the transmission route while preserving the technical function of the vegetation management plan.

In response to comments submitted by the Minnesota Department of Natural Resources (MDNR), EERA recommends the following special permit conditions be included, consistent with other recently issued permits:<sup>3</sup>

#### **6.5 Dust Control**

The Permittee shall utilize non-chloride products for onsite dust control during construction.

#### **6.6 Wildlife-Friendly Erosion Control**

The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

Staff is available to answer any questions you may have.

Sincerely,



Jamie MacAlister  
Environmental Review Manager

Cc: Ray Kirsch, EERA  
Cezar Panait, PUC

---

<sup>3</sup> See *Byron Solar Site Permit*, May 1, 2023, eDockets No. [20235-195471-02](#)