Minnesota Department of Natural Resources

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



February 24, 2014

Richard Davis, Environmental Review Manager Minnesota Department of Commerce 85 7th Place East, Suite 500 St. Paul MN 55101

Re:

In the Matter of the Application of Odell Wind Farm, LLC for a Route Permit for a High

Voltage Transmission Line for the Odell Wind Farm Project

Public Utilities Commission (PUC) Docket Number: IP-6914/TL-13-591

DNR ERDB Number: 20140215

Dear Mr. Davis:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application (Application) for the Transmission Line for the Odell Wind Farm Project. Please consider the following comments regarding the Application and for preparation of an Environmental Assessment.

As discussed in the Application, the proposed route includes two crossings of the public watercourse Cedar Creek. This activity will require a License to Cross Public Waters. Also the Woad Hill Substation is close to the same public watercourse. It would be beneficial to keep the substation footprint to the western portion of the proposed substation site and to increase the vegetative buffer by the watercourse. The attached aerial photograph shows habitat along Cedar Creek in the vicinity of the substation site.

The Application states that there are no rare features within one mile of the proposed project. The DNR has reviewed data for this project and concurs that there are no rare features within one mile of the project area. However, it is unclear from the Application how the project proposer made their determination. A Natural Heritage Review was not completed specifically for this project and the Natural Heritage letter, completed for the Odell Wind Farm and attached to the application, mentions several rare features. It should be noted that the Natural Heritage letter for the Odell Wind Farm does not apply to the Odell Transmission Line. Natural Heritage letters are project specific and only valid for the project as described on the Natural Heritage Information System Data Request Form.

Though the DNR reviewed this project and concurs with the findings in the Application, in the future, a Natural Heritage Review should be completed prior to the submission of the Route Permit Application. Or, if the determination of no rare features was done through a License Agreement, the Application should note this and include the License Agreement number.

Thank you for the opportunity to review the Route Permit Application for the Transmission Line for the Odell Wind Farm Project. Please contact me with any questions.

Sincerely,

Jamie Schrenzel Principal Planner

Environmental Review Unit

(651) 259-5115

Enclosure: 1

cc: Michael Kaluzniak, Minnesota Public Utilities Commission

Patrick Smith, Odell Wind Farm, LLC

