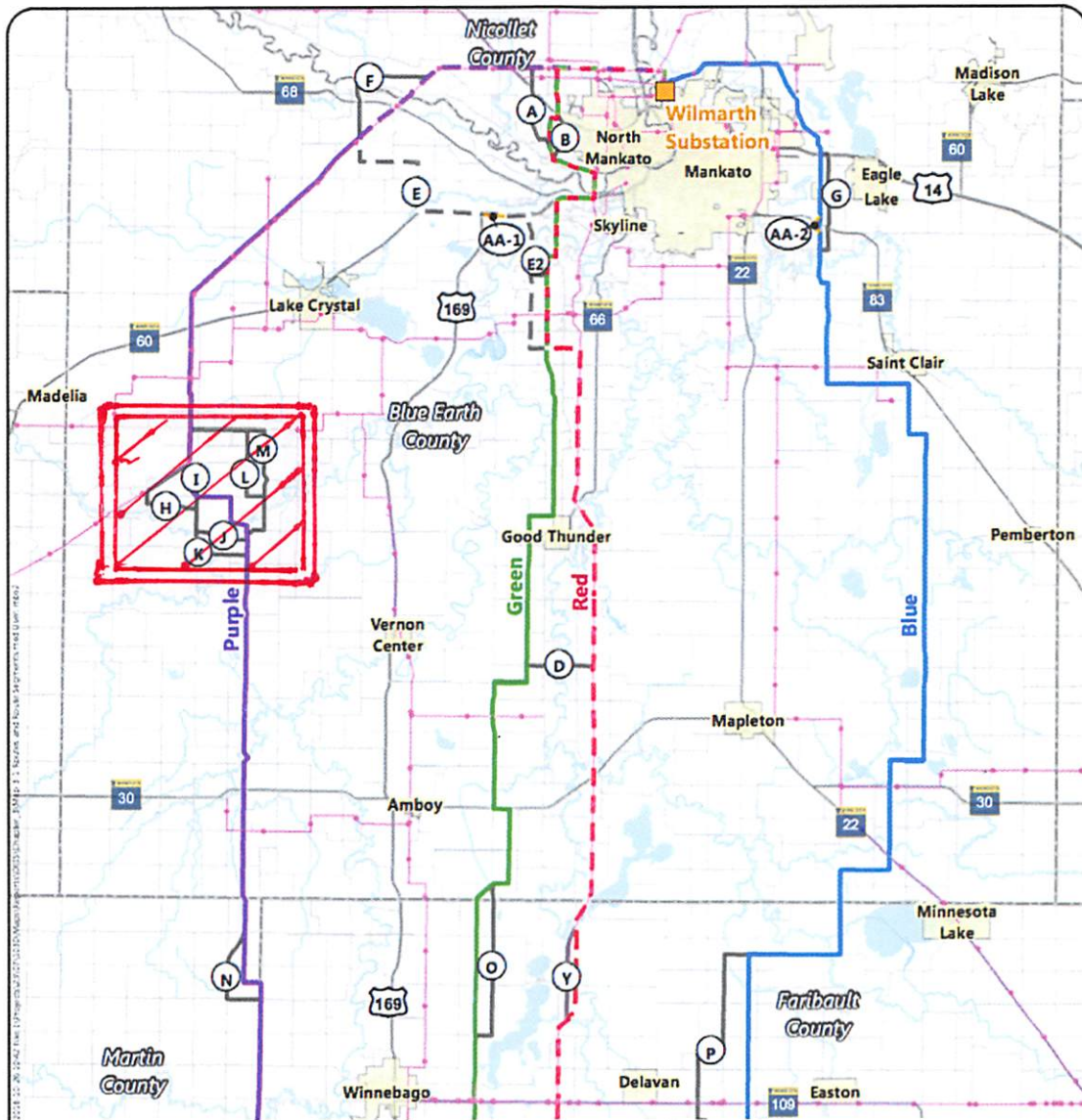


WATONWAN CROSSING

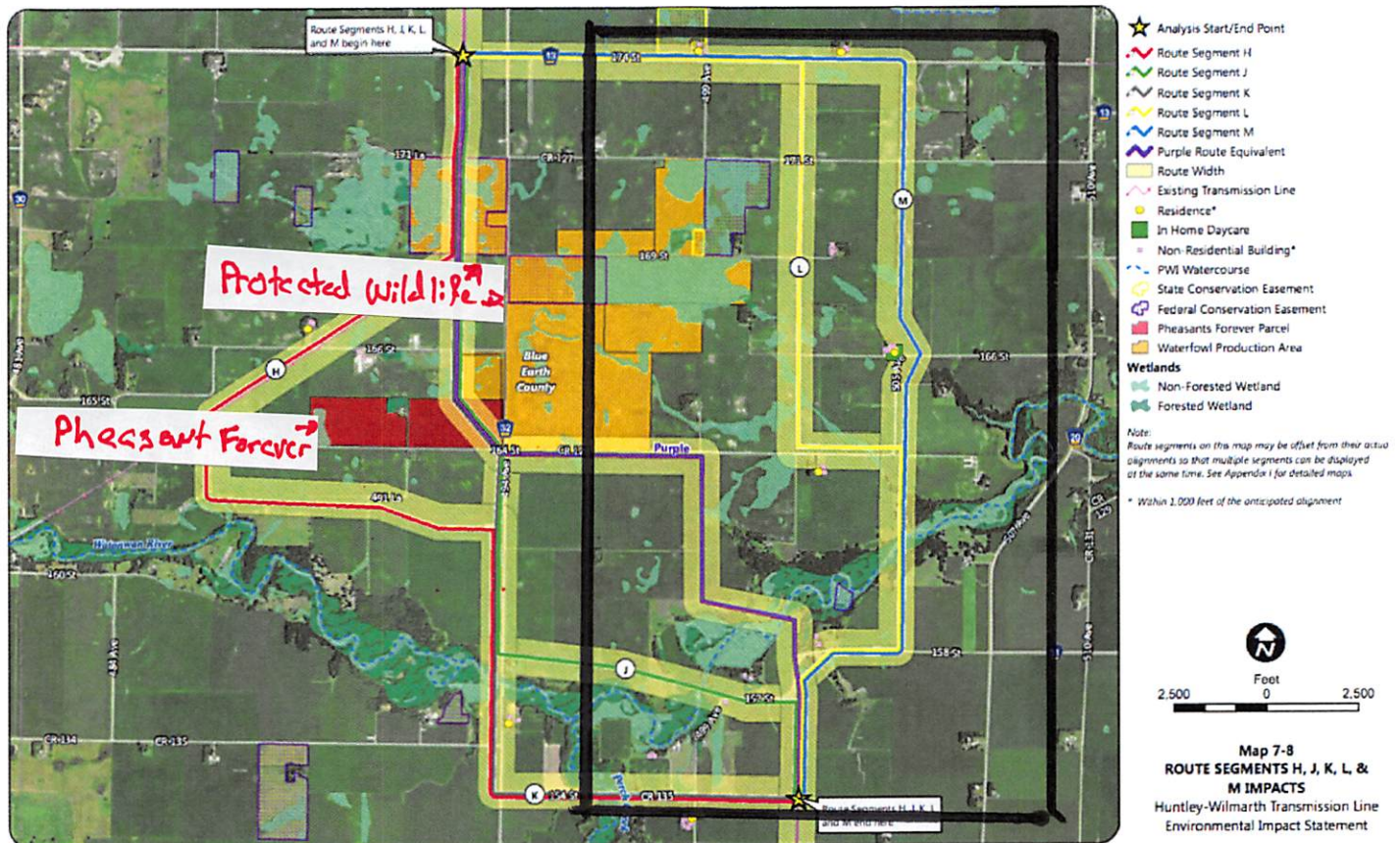
Map 3-1 Routing Alternatives



Commissioner Tuma

WATONWAN CROSSING

Page 7-27 FEIS



HILLSTROM'S Relevant Comments on Alternative L and the Watonwan River Crossing

DIRECT TESTIMONY OF THOMAS G. HILLSTROM

On Behalf of NORTHERN STATES POWER COMPANY, and ITC MIDWEST LLC

September 6, 2018

Pages 24-25

**Q. HOW WERE THESE SIX ROUTE SEGMENT ALTERNATIVES RELATED TO THE
WANTOWAN RIVER DEVELOPED?**

A. Some of the segment alternatives were proposed during public scoping. Route segments H-M were developed as a result of a field visit conducted by the Applicants and MnDNR in consultation with DOC-EERA. These segments provide different crossing options for the Watonwan River and some avoid crossing the Pheasants Forever parcel.

REBUTTAL TESTIMONY OF THOMAS G. HILLSTROM

On Behalf of NORTHERN STATES POWER COMPANY, and ITC MIDWEST LLC

December 18, 2018

Page 14

Based on discussions with USFWS staff, Applicants believe that the land along Segment H has the highest probability of being acquired for the Federal refuge system.

Alternative Segment H is also the most costly segment alternative under consideration for the Watonwan River crossing. As Segments J and K require the use of Segment H to avoid the Federal refuge lands to the north, these same considerations apply to these segments. Based on the probability of property along this segment being acquired by USFWS, the higher costs, as well as Applicants' review and comparison of human and environmental impacts for all of these segments, Applicants prefer either Route Segment L or Route Segment M for the Watonwan River crossing.

Hillstrom Direct
9/6/18

1 Q. CAN YOU DESCRIBE THE NEW ROUTE SEGMENT AND ALIGNMENT
2 ALTERNATIVES FOR THE PURPLE ROUTE?

3 A. Yes. Seven of the route segment alternatives and one of the alignment
4 alternatives contained in the scoping decision are for the Purple Route. Six
5 of the route segment alternatives relate to the area near the Purple Route's
6 crossing of the Watonwan River.

7
8 Q. WHY ARE THERE SIX NEW ROUTE SEGMENT ALTERNATIVES FOR THE PURPLE
9 ROUTE NEAR THE WATONWAN RIVER?

10 A. There are two separate issues that resulted in the addition of these new
11 segments: (1) the area near the Watonwan River contains high value wildlife
12 habitat and (2) there is a parcel of land that is currently owned by Pheasants
13 Forever, and this parcel is in the process of being transferred to USFWS to
14 be added to the existing WPA. The current proposed route for the Purple
15 Route traverses this Pheasants Forever property and is adjacent to the
16 southern boundary of an existing WPA. As the Applicants may be unable to
17 obtain a new transmission line easement across the Pheasants Forever
18 parcel, additional route segment alternatives are proposed for this area. The
19 six new segments provide alternatives to avoid current and future WPA land
20 and cross the Watonwan River at locations that minimize effects to the
21 Watonwan River valley.

22
23 Q. HOW WERE THESE SIX ROUTE SEGMENT ALTERNATIVES RELATED TO THE
24 WATONWAN RIVER DEVELOPED?

25 A. Some of the segment alternatives were proposed during public scoping.
26 Route segments H-M were developed as a result of a field visit conducted by

1 the Applicants and MnDNR in consultation with DOC-EERA. These
2 segments provide different crossing options for the Watonwan River and
3 some avoid crossing the Pheasants Forever parcel.
4

5 Q. HAVE USFWS OR PHEASANTS FOREVER PROVIDED FEEDBACK ON THE
6 FEASIBILITY OF CROSSING THE PHEASANTS FOREVER PARCEL?

7 A. USFWS staff have indicated that they would not support a route through the
8 Pheasants Forever parcel. Applicants understand that USFWS will provide
9 formal comments during the permitting process.
10

11 Q. DO THE APPLICANTS HAVE A PREFERENCE AMONG THESE SIX ROUTE
12 ALTERNATIVES?

13 A. Not at this time. While Applicants no longer support the original Purple
14 Route in this area given the difficulty of obtaining the necessary land rights,
15 each of these six route alternatives is a viable route. These six route
16 segments avoid the Pheasants Forever parcel and also cross the Watonwan
17 River in low-impact areas along a road or at a narrow area of the river valley.
18

19 Q. WHAT OTHER ROUTE SEGMENT ALTERNATIVES ARE PROPOSED FOR THE
20 PURPLE ROUTE?

21 A. On the southern half of the Purple Route, Route Segment N was proposed
22 during scoping to minimize impacts to farmland and follows a drainage
23 ditch. Applicants note that this segment adds approximately 0.6 miles of
24 length, thereby increasing costs, and passes by two additional residences than
25 the comparative portion of the Purple Route.
26

1 Q. BASED ON YOUR REVIEW OF THE CURRENT HUD GUIDELINES, DO YOU
2 BELIEVE THE PROPOSED TRANSMISSION LINE WILL IMPACT THE ABILITY OF
3 HOMEOWNERS OR DEVELOPERS TO OBTAIN FHA-INSURANCE FOR THEIR
4 MORTGAGES?

5 A. No. I do not believe that the proposed transmission line will impact the
6 ability of homeowners or developers to qualify for an FHA-insured
7 mortgage. No homes are currently located under the proposed location for
8 the conductors for the Project. In addition, no homes or structures are
9 located within the proposed easement area for the transmission line. As a
10 result, the HUD criteria related to proximity to transmission lines will be
11 met. Further, in all of the proceedings I have participated in, no one has
12 identified any instance where an FHA-insured mortgage was denied for a
13 single-family home due to its proximity to a transmission line.
14

15 III. WATONWAN RIVER CROSSING

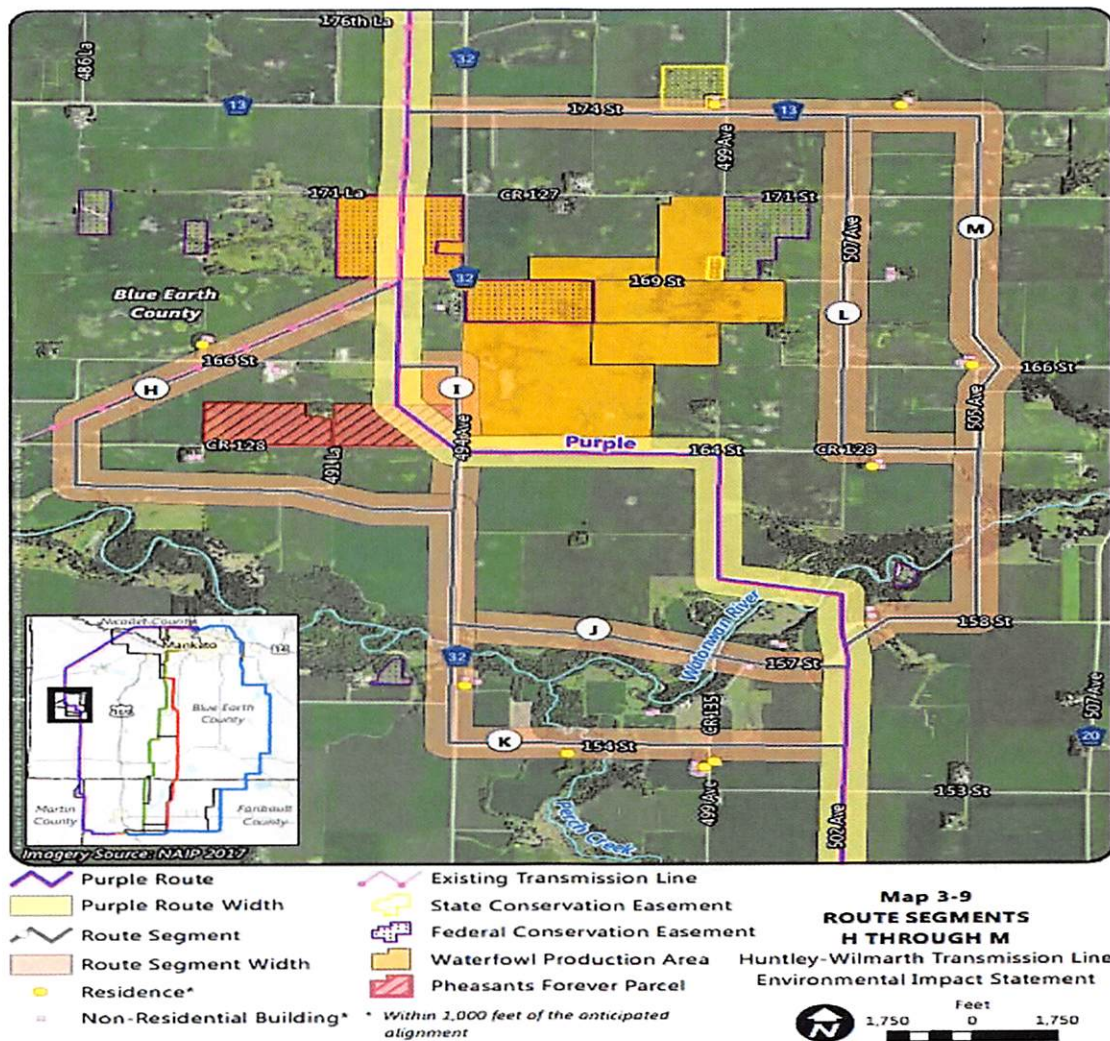
16

17 Q. IN YOUR DIRECT TESTIMONY YOU STATED THAT THERE ARE CURRENTLY SIX
18 ROUTE SEGMENT ALTERNATIVES (ROUTE SEGMENTS H-M) FOR THE PURPLE
19 ROUTE NEAR THE WATONWAN RIVER. YOU ALSO TESTIFIED THAT YOU
20 ANTICIPATED THAT USFWS WOULD PROVIDE FEEDBACK ON THESE SIX
21 ROUTE SEGMENT ALTERNATIVES. HAS THE USFWS PROVIDED ANY
22 FEEDBACK ON THESE ROUTES?

23 A. Applicants have discussed the Project with USFWS but the USFWS has not
24 provided formal feedback on the various segments being considered near the
25 Watonwan River (Segments H-M). Applicants believe that neither the
26 original Purple Route nor Alternative Segment I is a permissible route

because these segments cross lands recently purchased and integrated into the Federal refuge system (shown in red hatched box shading in Figure 4). Remaining routes in the Watonwan River Crossing area can either go west of refuge lands (Segment H or Segment H plus Segment J or K) or east of refuge lands (Segments L or M). These segments are shown on Figure 4 below which is a copy of map 3-9 from page 3-13 of the DEIS.

Figure 4
Route Segments H through M



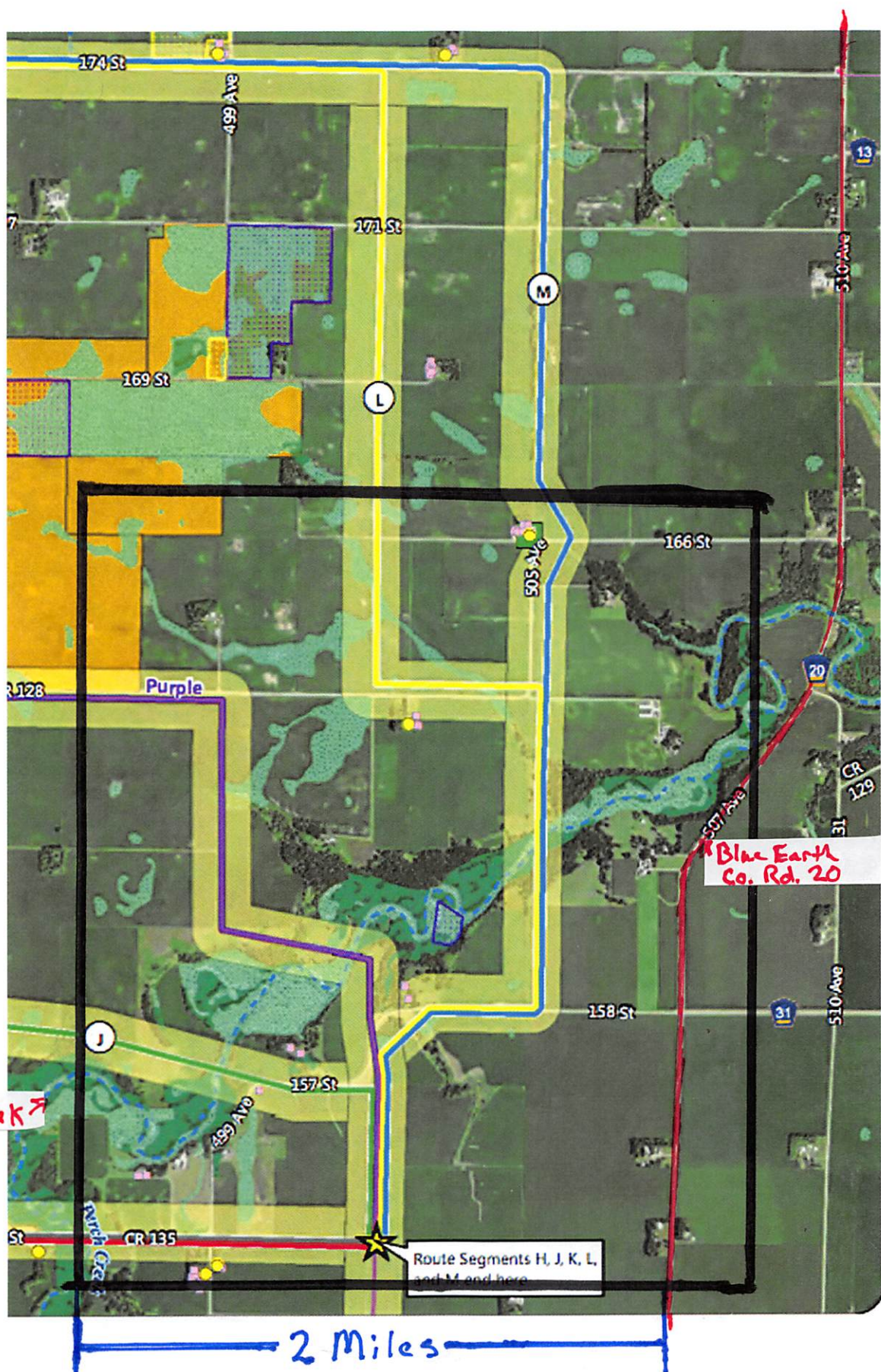
1
2 Based on discussions with USFWS staff, Applicants believe that the land
3 along Segment H has the highest probability of being acquired for the
4 Federal refuge system. Alternative Segment H is also the most costly
5 segment alternative under consideration for the Watonwan River crossing.
6 As Segments J and K require the use of Segment H to avoid the Federal
7 refuge lands to the north, these same considerations apply to these segments.
8 Based on the probability of property along this segment being acquired by
9 USFWS, the higher costs, as well as Applicants' review and comparison of
10 human and environmental impacts for all of these segments, Applicants
11 prefer either Route Segment L or Route Segment M for the Watonwan River
12 crossing.

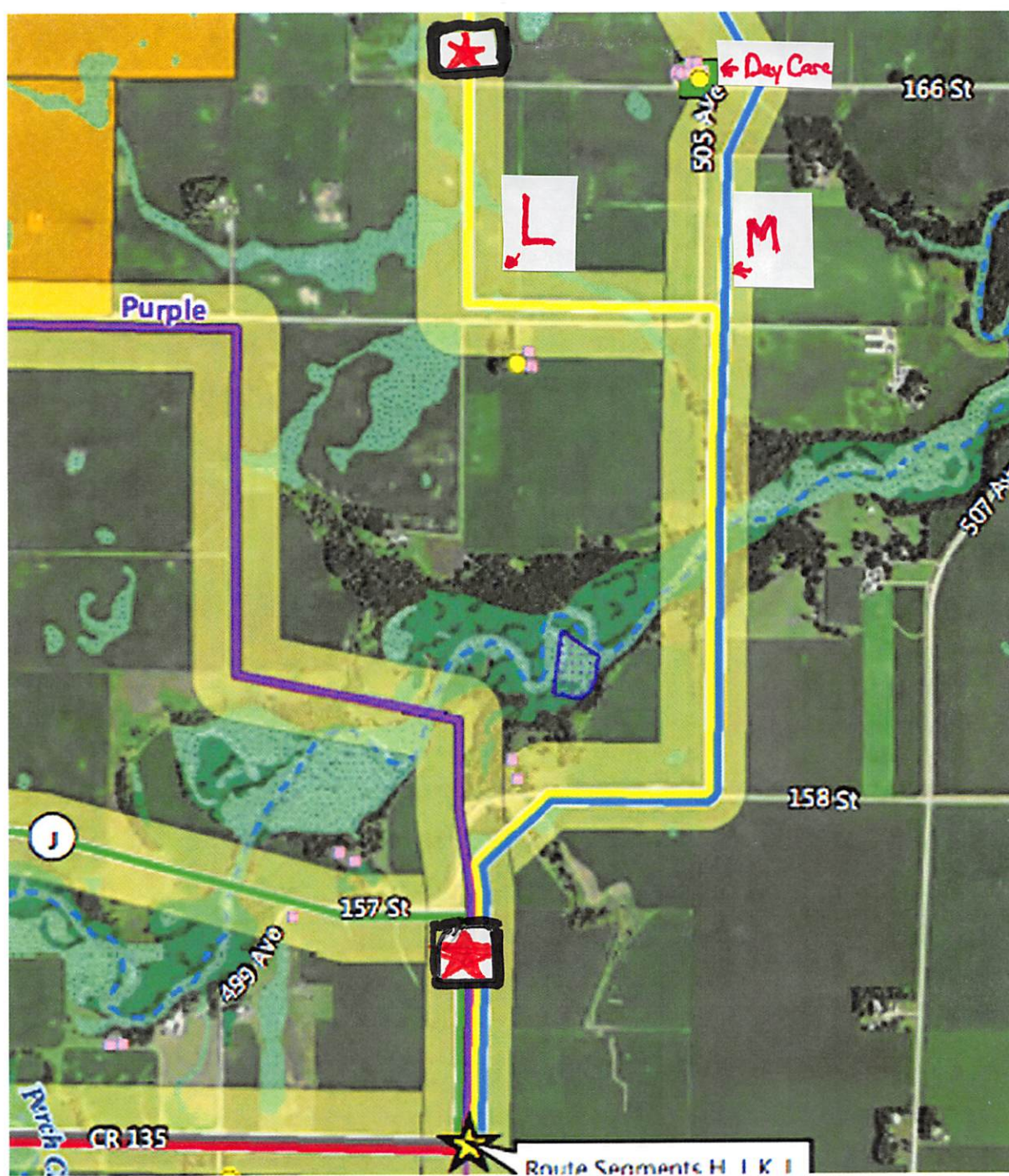
13 14 IV. AGRICULTURAL MITIGATION PLAN

15
16 Q. IN YOUR DIRECT TESTIMONY YOU STATED THAT A DRAFT AGRICULTURAL
17 MITIGATION PLAN FOR THE PROJECT HAD BEEN PREPARED AND WAS BEING
18 REVIEWED BY THE MINNESOTA DEPARTMENT OF AGRICULTURE. DO YOU
19 HAVE ANY UPDATES ON THIS REVIEW?

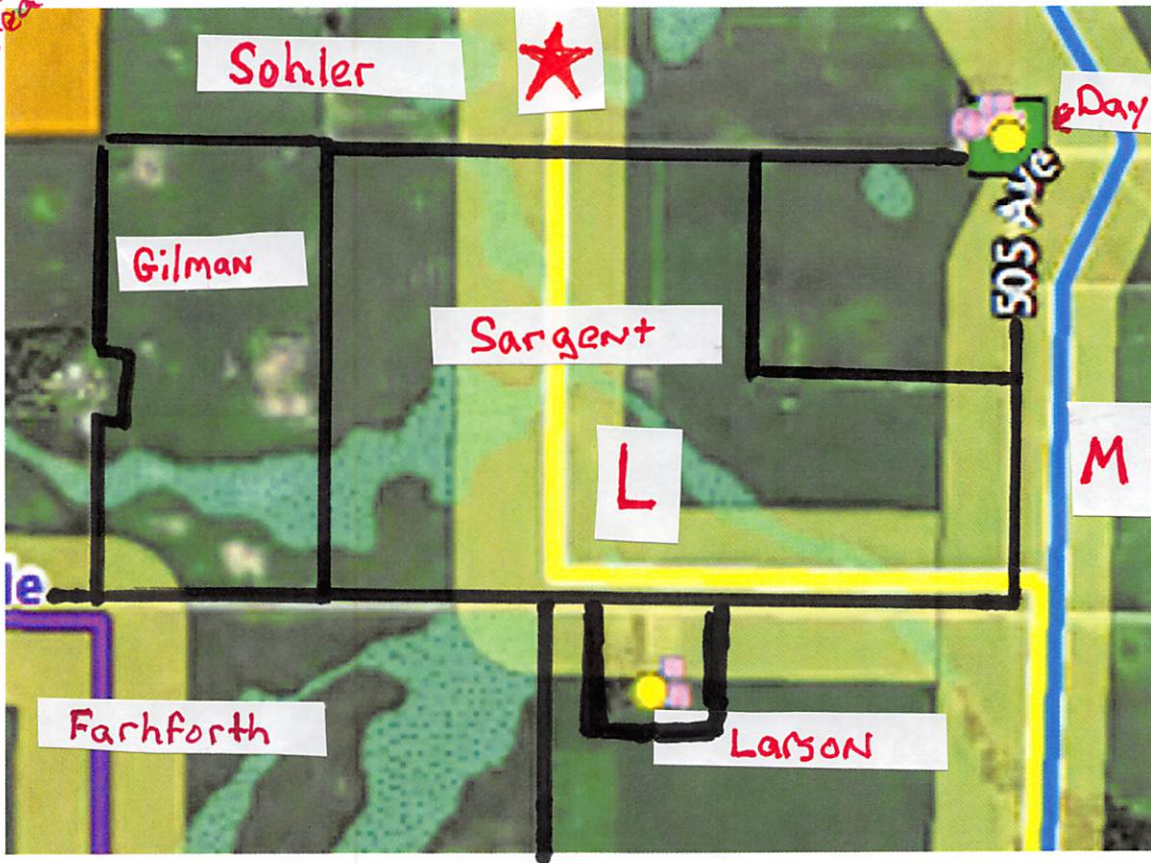
20 A. Yes. Applicants and the Department of Agriculture have finalized the terms
21 of the Agricultural Mitigation Plan for this Project. The Agricultural
22 Mitigation Plan specifies the measures that Applicants will take to avoid and
23 mitigate any impacts to agricultural land that may result from the
24 construction of this Project. A copy of the final Agricultural Mitigation Plan
25 for the Project is included as Appendix D to the DEIS.

26





Wildlife Area



Sergeant and Larson parcels

Abby Larson Comment, Monday, January 28, 2019

Appendix L, pages 185-186

Appendix L Comments and Responses

FEIS ID #23

From: [Abby Larson](#)
To: [Kirsch, Raymond \(COMM\)](#)
Cc: [Lance Larson](#)
Subject: Public Comment for Huntley to Wilmarth 345 kV Transmission Line Project
Date: Monday, January 28, 2019 10:12:18 PM

Dear Ray Kirsch, Environmental Review Manager,

23-1

We have a family of 5 and live on the purple L route option. We have many concerns about this option. My husband is medically retired Army. He served two difficult tours of duty in Iraq during Operation Iraqi Freedom. We chose the location we live because it is very private and quiet. He has PTSD and the extra traffic and noise that these lines will cause could make it worse.

23-2

23-3

I have also read many studies that cannot disprove the increased risk of cancer these lines may cause. My degree and career is in the medical field and I understand these studies and the health risks. Our mother died of lung cancer at a young age. We have cancer on both sides of our family. We do everything we can to reduce our risk and reduce the risks to our children. Having these power lines so close to our home will provide too much of an extra risk. We have 3 children to think about and we have many safety and health concerns.

23-4

We are also starting a dog training business in which we will be training service dogs and hunting dogs. We fear that the extra commotion, noise and traffic will set off the dogs and also pose a potential safety risk to them. These power lines reduce property value. Our family simply cannot afford that. Please take our concerns into consideration when choosing the route.

23-5

The purple L route will affect many families and livelihoods. We met with our neighbors who also have valid concerns and we all feel the Purple, E, Red route is the better option as this will avoid more homes, businesses and livestock.

Thank you for your consideration,

Lance and Abby Larson

Page 186 - responses to Abby Larson Comment

Appendix L
Comments and Responses

FEIS ID #23

23-1.

Your objection to route segment L is noted and included in the record for this EIS.

23-2.

Chapter 5.4.3 of the EIS discusses potential noise impacts from the project and associated mitigation measures.

23-3.

Chapter 5.6 of the EIS discusses potential public health and safety impacts of the project and associated mitigation measures.

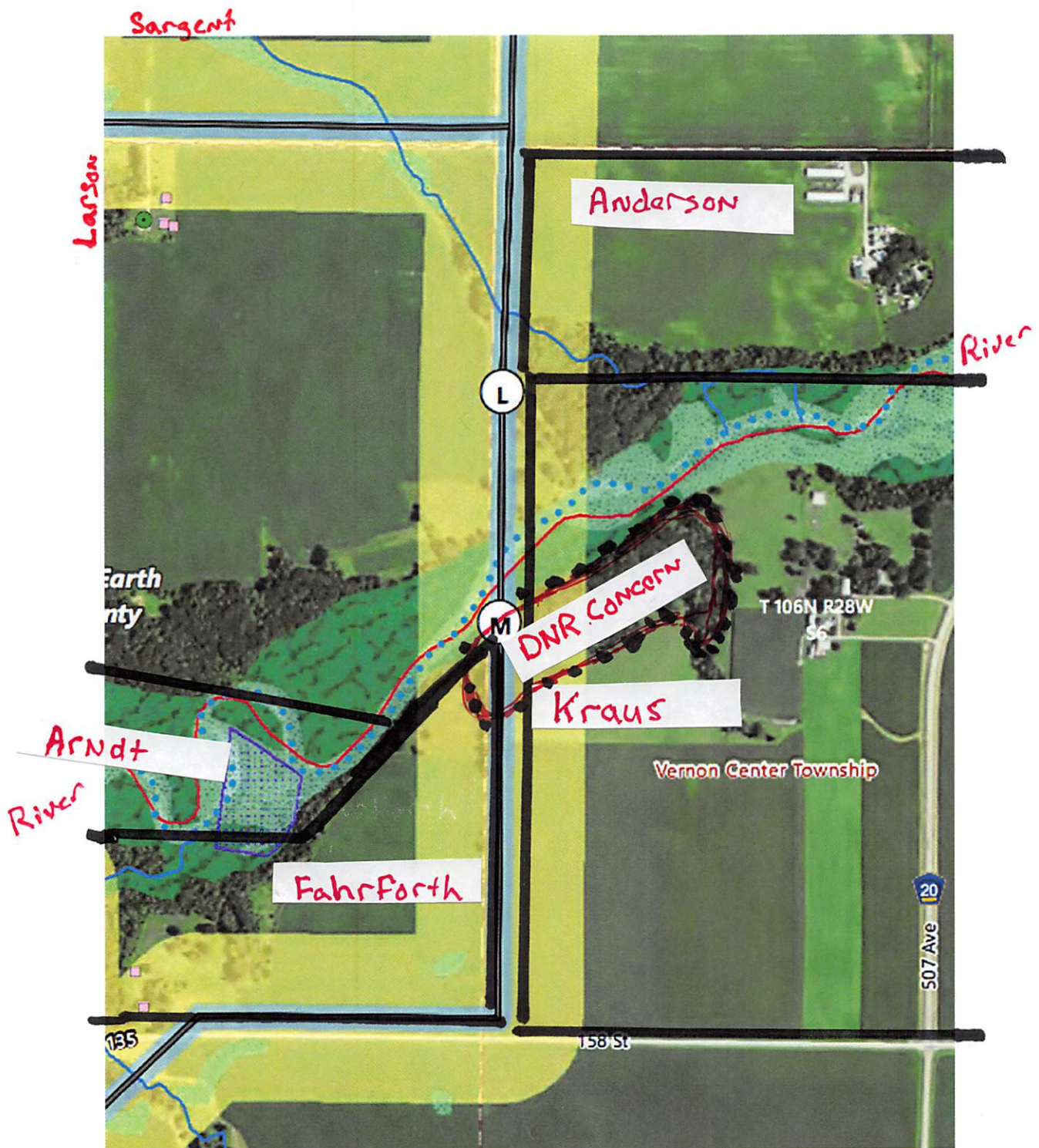
23-4.

Chapter 3.6 of the EIS discusses construction and maintenance procedures for the project. Chapter 5.4.4 and Appendix E of the EIS discuss potential property value impacts for the project and associated mitigation measures.

23-5.

Your objection to route segment L and support for the purple-E-red route are noted and included in the record for this EIS.

Barb Anderson Comments, January 9, 2019
Mankato Marriott
Appendix L, pages 352-357





Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road
St. Paul, MN 55155-4040

March 14, 2019

[Electronic Submittal]

Charley Bruce
Public Advisor
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
St. Paul MN 55101-2147

RE: In the Matter of the Applications of Xcel Energy and ITC Midwest LLC for a Certificate of Need and a Route Permit for the Huntley to Wilmarth 345 kV Transmission Line Project in South Central Minnesota
Public Utilities Commission Docket Number: ET-6675/TL-17-185

Dear Mr. Bruce,

The Minnesota Department of Natural Resources (DNR) has reviewed the draft environmental impact statement (EIS) for the Huntley to Wilmarth 345 kV Transmission Line Project in South Central Minnesota. The DNR offers our recommendations on the various route options as well as conditions that should be included in the route permit to mitigate project impacts.

Recommendations on Routes, Route Segments, and Alignment Alternatives

Alignment Alternative 3 (AA-3)

As described in Chapter 3.3.3, AA-3a and AA-3b provide reduced impacts to the forested habitat associated with the Blue Earth River. Our agency supports either AA-3a or AA-3b over the purple route, which is located north of both alignment alternatives.

Red Route and Route Segment Y

Chapter 7.14 discusses the red route (405th Avenue) and route segment Y near Smith Wildlife Management Area (WMA). Our agency supports the red route with double circuiting to include the existing Huntley-South Bend 161 kV transmission line. This removes the existing 161 kV transmission line from running parallel to Smith WMA and reduces the number of WMA acres impacted. Currently the 161kV line is near large wetlands on Smith WMA that are highly used by avian species. Moving the existing transmission line farther from the WMA is likely to reduce the number of avian collisions.

Route Segment F

Chapter 7.5 discusses route segment F that avoids crossing Minneopa State Park. Our agency can only support route segment F if it includes the removal of the existing transmission line that crosses the Minnesota River and goes through Minneopa State Park. The existing line would then be co-located with the new line associated with route segment F. Instead of maintaining two crossings, the removal of the existing line would maintain only one crossing of the Minnesota River (route segment F) and allow the currently fragmented forest to re-establish along the river.

Purple Route

As illustrated in Map 7-6, the purple route passes through Minneopa State Park on an existing transmission line right of way. If this route is chosen for construction, it should use double circuit monopoles to limit the impacts to the park. The DNR's support of the purple route as a viable option is based on the transmission line work being restricted to the existing easement area.

Alternative Segments A and B

Map 28 of 86 depicts the green red route, alternative segments A and B. Alternative segment B is parallel to Rockford Road and minimizes impacts to forested habitat and avian collisions. As such, alternative segment B is more environmentally sensitive than alternative segment A.

New Segment Alternatives

Xcel Energy filed new segment alternatives for the purple and blue routes on February 1, 2019. Based on the information in the filing, the new purple route segment alternative BB and blue route segment alternative CC minimize impacts to natural resources. Table 1 and Table 2 indicate the number of stream crossings, forested habitat cleared, and wetland in the right-of-way would be reduced. As such, our agency supports including the new segments in the final EIS as viable segments that cause the least amount of environmental damage when compared to the original routes.

Impact Minimization and Permit Conditions

Native Plant Community

Map 7-8 in Chapter 7.7 depicts route segment M crossing the Watonwan River by going through a native plant community consisting of very mature basswood and bur oaks (map attached). Impacts to route segment M can be minimized by shifting it approximately 125 feet to the west of the native plant community. Efforts should continue on all segments to further minimize impacts and the final EIS table should reflect those numbers.

Vegetation Management Plan

The DNR recommends that a detailed Vegetation Management Plan (VMP) be prepared for the right-of-way easement in Minneopa State Park. The VMP will need to be very specific about the techniques that will be used to control invasive plants, monitoring schedules, and reports that will be provided to Minneopa State Park staff. The final EIS needs to include a commitment by Xcel to develop the VMP. The VMP should be coordinated with the DNR and be included as a condition of the route permit.

Winter Tree Clearing

The DNR supports winter tree clearing for the project. Winter tree clearing ensures that nesting birds and roosting bats are not directly impacted by construction. Our agency recommends that the final EIS include a

commitment from Xcel for winter tree clearing. Additionally, the route permit should require this best management practice.

Avian Flight Diverters

Our agency will work with Xcel to determine appropriate locations for avian flight diverters after the route is determined. Avian flight diverters will be needed at river crossings, fragmented forested patches, and near lakes and wetlands. The use of avian flight diverters will minimize the number of bird collisions with the transmission lines.

Rare and Unique Natural Resources

Chapter 5.10 states that the applicant will coordinate with the appropriate agencies regarding potential impacts to rare native plant communities and state-listed species, including the need for surveys. The DNR recommends that agency coordination be included as a route permit condition.

The DNR appreciates the opportunity to comment on the draft EIS for the Huntley to Wilmarth Transmission Line Project. If you have questions about our agency's comments, I can be reached at cynthia.warzecha@state.mn.us or 651-259-5078.

Sincerely,

A handwritten signature in black ink, reading "Cynthia Warzecha". The signature is fluid and cursive, with a long horizontal stroke at the end.

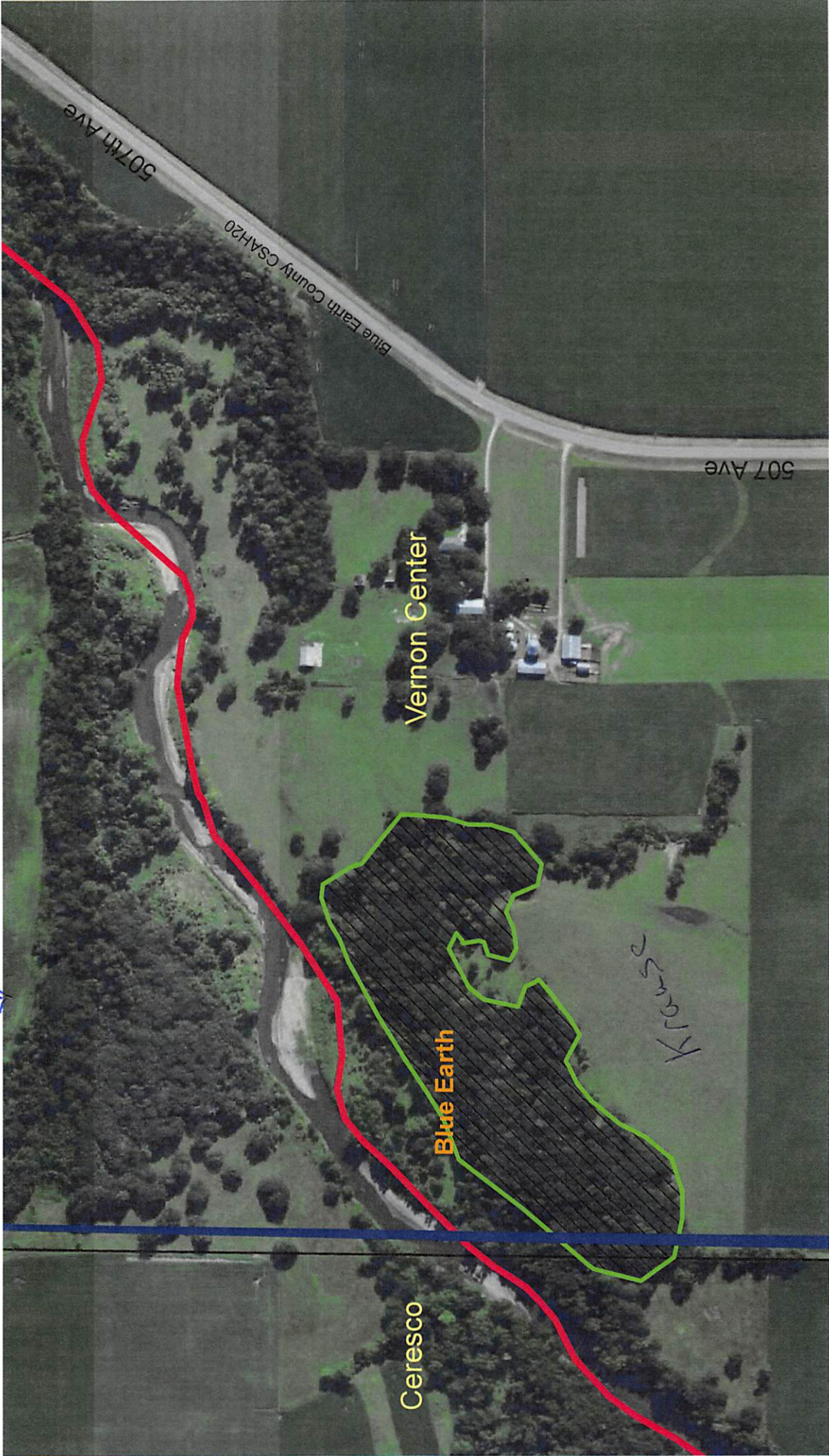
Cynthia Warzecha
Energy Projects Planner
Environmental Review Unit

Attachment: Route Segment M crossing the Watonwan River – Native Plant Community

CC: Tricia DeBleeckere, Minnesota Public Utilities Commission
Ray Kirsch, Minnesota Department of Commerce
Thomas Hillstrom, Xcel Energy
ERDB 20170367

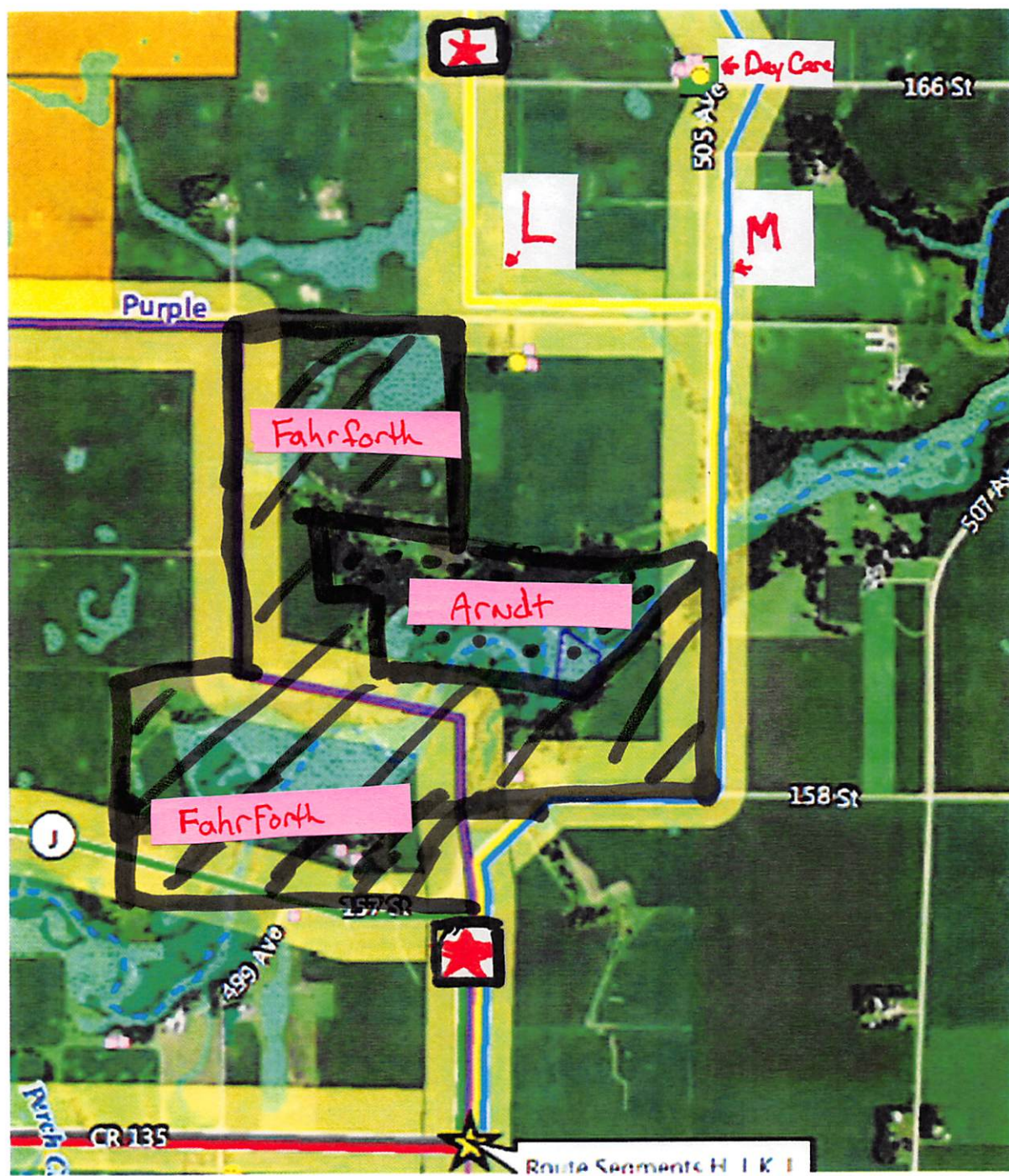
North
↑

Wassenaar
↓



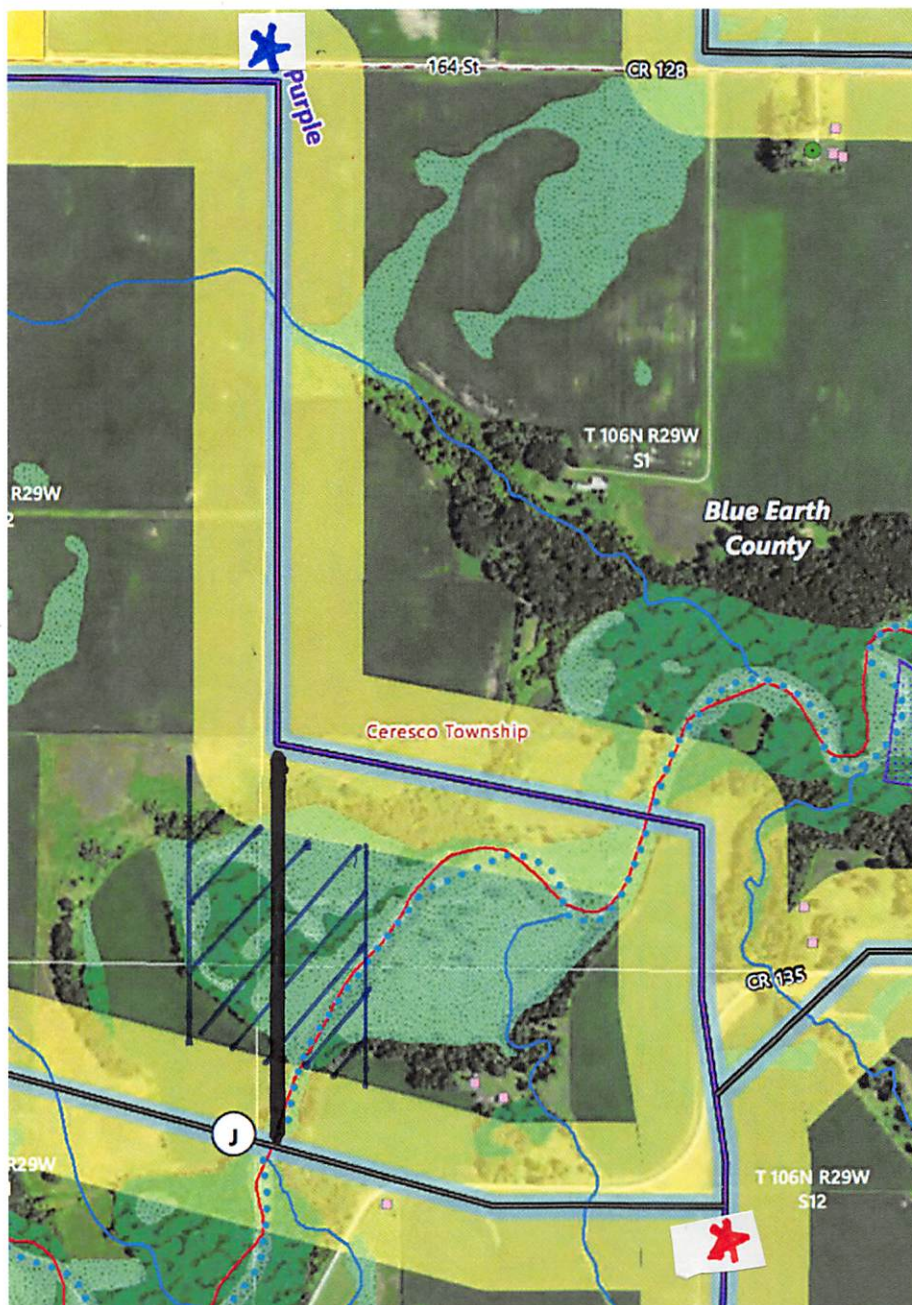
Sohler, Sargent & Gilman Property/Field Line Alternative





Arndt - Fahrforth Offered Alternative

During the scoping comment period for the EIS, Ms. Connie Fahrforth, and Mr. Darwin Arndt discusses possible alternative to the purple route Crossing of the Watonwan River (see scoping comment letters of Ms. Connie Fahrforth and Mr. Darwin Arndt, May 24, 2018, eDockets Number 20185-143325-09).



Purple

Ceresco Township

Eagle Nest (Arndt)

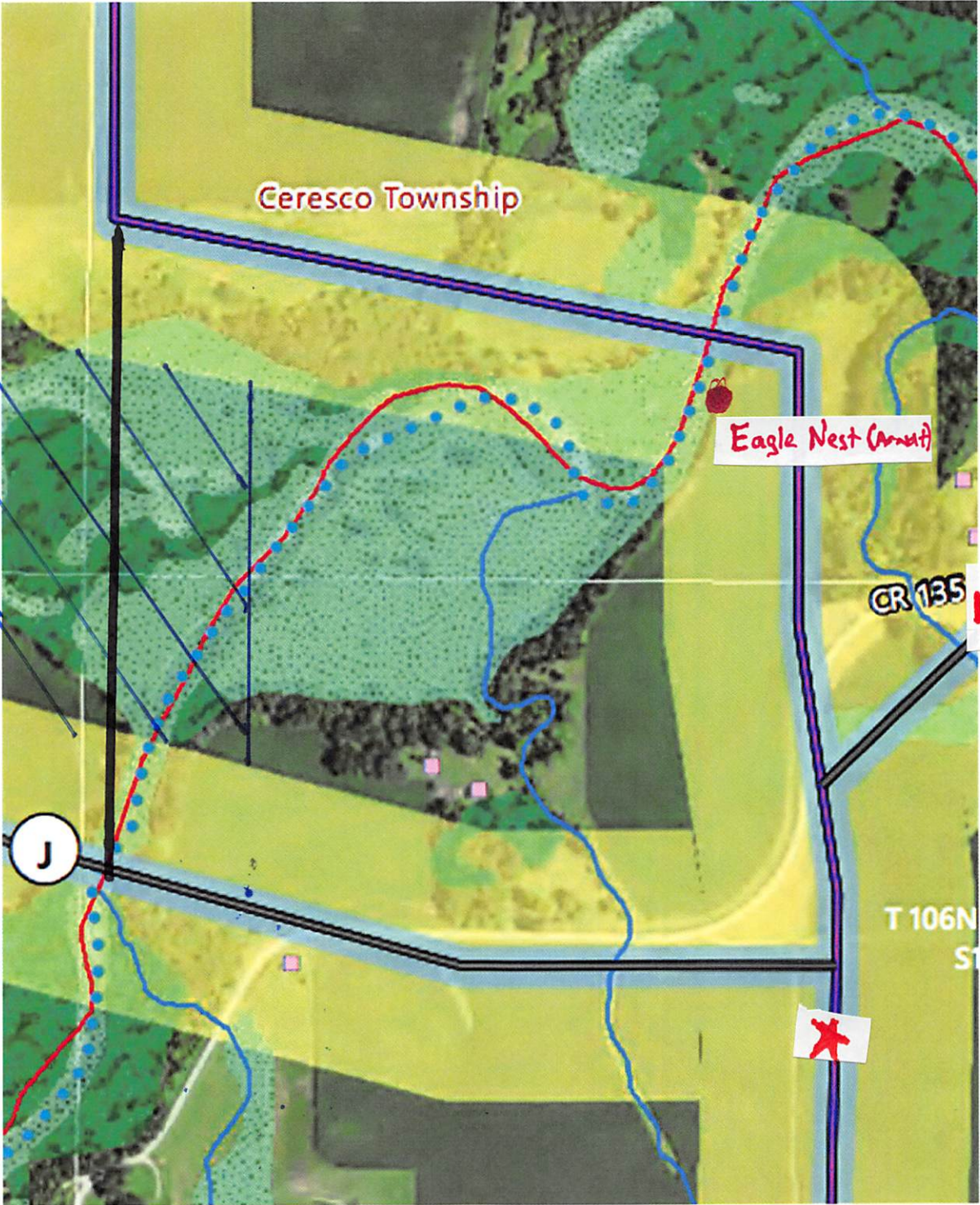
CR 135

L&M

T 106N
ST

Arndt
Fahrforth
Alt.

J



**Relevant Excerpts from the Comments of
Ms. Connie Fahrforth, and
Mr. Darwin Arndt**

Written comments of Darwin Arndt received April 30, 2018 "I do have some information that may be helpful from a former ownership experience and friendship with Connie Farhforth. I would like to make a suggestion if this alternative route (Purple) is selected based on my past familiarity with the area. I am placing some information on your map about this environmentally sensitive area." He drew a route taking the purple route down to what later become Alternative J and stated that his proposed improved route is "the area I'm referring to is mostly old cattle pasture."

May 16, 2018 joint letter from Darwin Arndt and Connie Farhforth "If the purple route is chosen, we would like to offer a proposal for crossing the farmland and forest, pasture in our section. We feel we have an alternative idea that would impact the environment much less and still meet the needs of electric power." They indicated their alternative "crosses more desirable terrain, little interference with the wild areas (oak savanna, sloughs, lagoons, resting areas, wintering areas and Eagles nest.), less deforestation for pathway and more accessible for future maintenance . . ."

RECEIVED
APR 30 2018
MAILROOM

PUBLIC COMMENT FORM

Huntley to Wilmarth 345 kV Transmission Line Project
Docket Nos. E002, ET6675/CN-17-184 and E002, ET6675/TL-17-185

Name: Darwin Arndt

Street Address: 83882 280th St

City: Madelia State: MN ZIP: 56062

Email or Phone: trucie@cccinternet.net 1-507-327-4499
1-507-642-8953

Please share your comments on the environmental impact statement (EIS) that will be prepared for the Huntley to Wilmarth 345 kV transmission line project:

- What human and environmental impacts of the project should be studied in the EIS?
- Are there specific methods to mitigate these impacts that should be studied in the EIS? Are there route alternatives that should be studied to mitigate these impacts?
- Are there other ways to meet the stated need for the project, instead of the proposed transmission line? If so, what alternatives to the project should be studied in the EIS?

COMMENTS MUST BE RECEIVED BY FRIDAY, MAY 4, 2018.

Dear Ray, I attended your input meeting in Mankato recently. I'm a former landowner that had property close to the proposed path of the transmission lines. My son, "Jon Arndt" is the new owner. I do have some information that may be helpful from my former ownership experience and friendship with landowner Connie Fehrfork. I would like to make a suggestion if this alternate route is selected based on my past familiarity with the area. I'm placing some information on your map about this environmentally sensitive area.

1. The area I'm referring to is mostly old cattle pasture
2. there is a federally protected species nesting near the route for the past 20 years. (Eagles) Dot on map.

Signature: Darwin Arndt Date: 4/27/2018

Please submit this form at today's meeting or mail it to the address provided on the back. Please use additional sheets as necessary. Comments can also be e-mailed to the Department of Commerce Environmental Review Manager, Ray Kirsch, at: raymond.kirsch@state.mn.us.

PUBLIC COMMENT FORMHuntley to Wilmarth 345 kV Transmission Line Project
Docket Nos. E002, ET6675/CN-17-184 and E002, ET6675/TL-17-185

Name: Darwin Arnot
Street Address: 83882 280th St.
City: Madelia State: MN ZIP: 56062
Email or Phone: 1-507-642-8853 1-507-327-4499

Please share your comments on the environmental impact statement (EIS) that will be prepared for the Huntley to Wilmarth 345 kV transmission line project:

- What human and environmental impacts of the project should be studied in the EIS?
- Are there specific methods to mitigate these impacts that should be studied in the EIS? Are there route alternatives that should be studied to mitigate these impacts?
- Are there other ways to meet the stated need for the project, instead of the proposed transmission line? If so, what alternatives to the project should be studied in the EIS?

COMMENTS MUST BE RECEIVED BY FRIDAY, MAY 4, 2018.

3. This site was selected by the DNR for the most westerly release of wild turkeys in 1992.
4. The DNR payed landowner for wild life food plots through the 1980's - 1990's because of the high volume of deer yarding here each year. Landowner continues program without reimbursement.
5. This pasture grassland is a highly prized nesting area for songbirds, meadowlarks and bobolinks.
6. DNR Foresters have compelled owner to preserve existing Oak Savana wood land
7. There is a CREP/Reimbursement in Minnesota project on Jon Arnot's land to help curtail riverbank erosion

Signature: Darwin Arnot Date: 4/27/2018

Please submit this form at today's meeting or mail it to the address provided on the back. Please use additional sheets as necessary. Comments can also be e-mailed to the Department of Commerce Environmental Review Manager, Ray Kirsch, at: raymond.kirsch@state.mn.us.

PUBLIC COMMENT FORMHuntley to Wilmarth 345 kV Transmission Line Project
Docket Nos. E002, ET6675/CN-17-184 and E002, ET6675/TL-17-185Name: Darwin Andt
Street Address: 83882 280th
City: Madelia State: MN ZIP: 56062
Email or Phone: 1-507-327-4499 1-507-642-8953

Please share your comments on the environmental impact statement (EIS) that will be prepared for the Huntley to Wilmarth 345 kV transmission line project:

- What human and environmental impacts of the project should be studied in the EIS?
- Are there specific methods to mitigate these impacts that should be studied in the EIS? Are there route alternatives that should be studied to mitigate these impacts?
- Are there other ways to meet the stated need for the project, instead of the proposed transmission line? If so, what alternatives to the project should be studied in the EIS?

COMMENTS MUST BE RECEIVED BY FRIDAY, MAY 4, 2018.

I'm offering an alternative idea for crossing the river other than what is proposed. Instead of cutting across pasture in most sensitive area, I think it would be prudent to go straight south across the pasture and river and make a jog to the east before heading south again.

This would seem to cause the least intrusion on the above mentioned species when servicing the line. Note black dot on map where Eagles nest is located as well as black dashed line for alternate course.

Signature: Darwin AndtDate: 4/27/2018Please submit this form at today's meeting or mail it to the address provided on the back. Please use additional sheets as necessary. Comments can also be e-mailed to the Department of Commerce Environmental Review Manager, Ray Kirsch, at: raymond.kirsch@state.mn.us.

Huntley Wilmarth Scoping Meeting



May 24, 2018

20185-143325-09

May 16 2018

Dear Mr. Kirsch,



Darwin Arndt
83882 280th St.
Madelia, MN 56062

Our family has attended two of your environmental impact meetings. Mankato / Mapleton.

If the Purple route is chosen, we would like to offer a proposal for crossing the farmland and forest, pasture in our section.

We feel we have an alternative idea that would impact the environment much less and still meet the needs of electric power.

Please see map included. It is a little written on, but we would be happy to show engineers the proposal. (Proposal would)

1. Rather than cut farm in half and go through environmentally sensitive areas.
 2. Cross the river in a more desirable terrain.
 3. Little interference with wild areas (Oak Savanna, sloughs, Lagoons, resting areas, wintering areas and Eagle nest.)
 4. Less deforestation for pathway
 5. More Accessible for future maintenance
- would like to show officials Idea.
Dar Arndt / Connie

Huntley Wilmarth Scoping Meeting

507th Ave - 507th Ave



**COMMENTS AND RECOMMENDATIONS OF MINNESOTA
DEPARTMENT OF COMMERCE
ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS
Ray Kirsch, June 19, 2018**

Pages 7-8

Route Segments H through M

The applicants, the DNR, and citizens proposed several route segments along the purple route near its crossing of the Watonwan River (Attachment 1, Map 5). This area contains high value wildlife habitat including grasslands, oak savannah, and wetlands. The discussion here regards only those route segments that EERA staff believes would aid in the Commission's decision on the route permit application. Those route segments that EERA staff believes would *not* aid in the Commission's decision and should not be carried forward in the EIS are discussed below (see Segments T through X).

Just north of the Watowan River, a substantial amount of land is preserved as a waterfowl production area (WPA). Pheasants Forever – a non-profit dedicated to preserving habitat for pheasants, quail, and other wildlife – is in the process of adding to this WPA by transferring a parcel of land for the WPA to the U.S. Fish and Wildlife Service (USFWS).²⁴ The applicants' proposed purple route crosses this parcel of land. If the parcel is transferred to the USFWS prior to construction of the transmission line, it is unlikely that the applicants could obtain an easement across the parcel. Thus, the purple route, as proposed, could be blocked.

Western Option

Based on consultation with the DNR and applicants, EERA staff is proposing an option to proceed around the western edge of the Pheasants Forever parcel, following an existing 345 kV line, and then proceeding east and south, crossing the Watonwan River along County Road 32, and then rejoining the purple route – route segment H. This segment minimizes potential impacts by following existing field lines and utilizing an existing crossing of the Watonwan River.

Central Options

Based on consultation with the DNR and applicants, EERA staff is proposing a crossing along the eastern edge of the Pheasants Forever parcel that may be preferable for the USFWS, as opposed to the diagonal crossing of the parcel by the purple route. This proposal is route segment I. If the purple route can proceed – on its original routing or along route segment I – there are two route segments that are relatively superior in minimizing potential wildlife habitat impacts – route segments J and K. Segment J was proposed by the DNR and jointly by Mr. Darwin Arndt and Ms.

Connie Fahrforth.²⁵ Segment K was proposed by the DNR and Ms. Connie Fahrforth.²⁶ Segment J crosses the river in a manner that limits potential impacts to forested areas. Segment K minimizes impacts by utilizing the existing crossing of the Watowan River along County Road 32.

Eastern Options

There are two route segments that could be used to proceed around the eastern side of the Pheasants Forever parcel and around existing WPA land in the area – route segments L and M. Route segment L was proposed by the applicants and modified in consultation with the DNR.²⁷ Based on consultation with the DNR and the applicants, EERA staff is proposing segment M. Both segments utilize existing roadway and field lines; both segments also minimize potential impacts to forested areas along the Watonwan River.

Based on the above discussion, EERA staff believes that route segments H through M would aid in the Commission's decision on the route permit application.

24 Applicants' Comments.

25 Comment Letter of Minnesota Department of Natural Resources, Agency Comments; Comment Letter of Mr. Darwin Arndt and Ms. Connie Fahrforth, Written Public Comments.

26 Comment Letter of Minnesota Department of Natural Resources, Agency Comments; Comment Letter of Ms. Connie Fahrforth, Written Public Comments.

27 Applicants' Comment Letter.

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Route Segments T through X

Route segments T through X were proposed by citizens along the purple route near the Watonwan River (Attachment 1, Map 15). They are cousins to route segments H through M (discussed above). However, after conferring with the DNR and applicants, EERA staff finds that segments T through X have relatively greater impacts than other routing alternatives that mitigate impacts at the Watonwan River (i.e., segments H through M; see Attachment 1, Map 16). Accordingly, EERA staff believes that segments T through X would not aid in the Commission's decision on the route permit application.

Mr. Douglas Fahrforth proposed an alternative to avoid wildlife habitat, particularly bird habitat, along the Watonwan River – route segment T.⁵⁰ Segment T is similar to Segment J, which was proposed by the DNR. However segment T impacts relatively more forested areas and places two ninety degree angles very near the Watonwan River. Accordingly, EERA staff finds that segment T has relatively more impacts than other alternatives that mitigate impacts to habitat near the river.

Mr. Darwin Arndt proposed an alternative to avoid pastures and wildlife habitat along the Watonwan River – route segment U.⁵¹ Segment U crosses an oxbow lake and a limited amount of forested area near the Watonwan River. Based on consultation with the DNR, EERA staff believes that a crossing of the Watonwan River near this oxbow lake and its associated habitat would have relatively more impacts than other alternatives that mitigate impacts to habitat along the river.

Ms. Connie Fahrforth proposed an alternative that could avoid wildlife habitat along the Watonwan

River by using an existing crossing along County Road 20 – route segment V.⁵² Though segment V minimizes impacts to habitat at the river, it impacts a number residences along County Road 20. Reviewing aerial photography, it appears that there are nine homes along County Road 20 that could be impacted by segment V. Other routing alternatives that mitigate impacts to habitat at the Watonwan River are near far fewer residences – e.g., the purple route in this area and segment J appear to impact no residences; segment K, three residences. Accordingly, EERA staff believes that segment V would have relatively more impacts than other alternatives that mitigate impacts to habitat along the river.

Mr. Darwin Arndt and Ms. Connie Fahrforth proposed two alternatives to avoid wildlife habitat along the Watonwan River – segments W and X.⁵³ These alternatives are variations on the applicants' purple route near the river. Like segment U, they propose crossing the Watowan River near an oxbow lake on the north side of the river. Based on consultation with the DNR, EERA staff believes that a crossing of the Watowan River near this oxbow lake and its associated habitat would have relatively more impacts than other alternatives that mitigate impacts to habitat along the river.

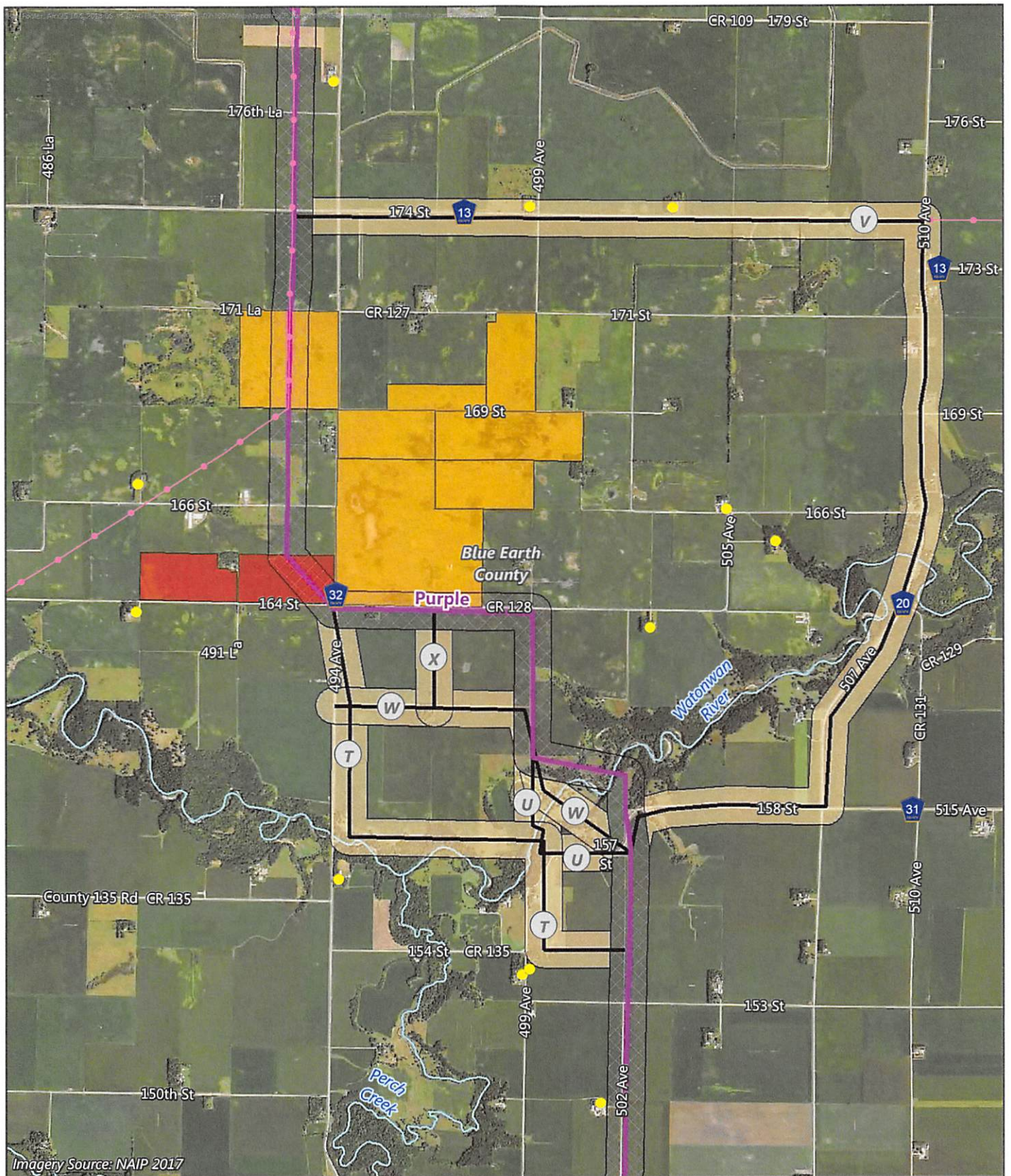
Based on the above discussion, EERA staff believes that route segments T through X would not aid in the Commission's decision on the route permit application.






50 Comment Letter of Mr. Douglas Fahrforth, Written Public Comments.

51 Comment Letter of Mr. Darwin Arndt, Written Public Comments.

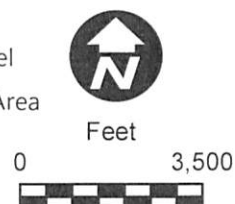
52 Comment Letter of Ms. Connie Fahrforth, Written Public Comments.

53 Comment Letter of Mr. Darwin Arndt and Ms. Connie Fahrforth, Written Public Comments.



-  Purple Route
-  Purple Route Width
-  Route Segment
-  Route Segment Width
-  Existing Transmission Line

-  Residence
-  Pheasants Forever Parcel
-  Waterfowl Production Area



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ROUTE SEGMENTS T THROUGH X
 Scoping Alternatives
 Huntley-Wilmarth 345kV Project