

APPENDIX K

Agency Correspondence

THIS PAGE INTENTIONALLY BLANK



GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 15, 2014

Ms. Cathy Huebsch
Office of Aeronautics
Minnesota Department of Transportation
222 E. Plato Blvd.
St. Paul, MN 55107-1618

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Ms: Huebsch:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Menahga area will serve two primary purposes:

- Strengthen the electric transmission system in the Menahga area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) Red Eye distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).

The Project will include:

- Construction of an east-west transmission line between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- Construction of a generally north-south transmission line between the existing Minnesota Power Pipeline Substation and the proposed new Todd-Wadena Red Eye distribution substation, which will be approximately 15.5 miles of primarily single-circuit 115 kV line.
- Construction of the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation and the new Todd-Wadena Red Eye Substation to serve the new MPL pumping station; and modifications to the existing Todd-Wadena Menahga Substation and the Minnesota Power Pipeline Substation.

Ms. Cathy Huebsch
September 15, 2014
Page 2

If you would like to learn more about the project, an open house public meeting for the project will be held on:

September 30, 2014

4-7 p.m.

at:

Menahga Senior Center
19 Cedar Ave. SE
Menahga, MN 56464

In most cases, round wood transmission structures will be used that will range in height from 60 to 90 feet above ground.

Great River Energy is requesting information on the possible effects of the proposed project on airports or airstrips in the project area. The proposed Project is nearly five miles from the Park Rapids Municipal Airport in Park Rapids, approximately 15 miles from the Wadena Municipal Airport in Wadena, and approximately 16 miles from the New York Mills Municipal Airport in New York Mills, Minnesota.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5214. If you wish to respond by e-mail, my address is cschmidt@greenergy.com.

Thank you for your attention to this important project.

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures: Fact Sheet/Project Map

s:\legal\environmental\transmission\projects\Menahga Area Project\Agency Correspondence\MenahgaMnDOTltr.doc

Menahga Area 115 kV Transmission Project



Great River Energy
12300 Elm Creek Blvd
Maple Grove, MN 55369-4718
1-888-521-0130
www.greatriverenergy.com



TODD-WADENA
ELECTRIC COOPERATIVE

Todd-Wadena Electric Cooperative
550 Ash Avenue NE
Wadena, MN 56482
1-800-321-8932
www.toddwadena.coop

Project Need

Great River Energy proposes a new overhead 115 kilovolt (kV) transmission line project (Menahga Area Project) in Hubbard, Wadena and Becker Counties to relieve overload issues on the transmission system in the area and to serve a new pumping station to be built by Minnesota Pipe Line Company (MPL). The Menahga Area Project would:

- Strengthen the Menahga area electric transmission system, as the existing 34.5 kV system serving the area is becoming outdated and reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) "Red Eye" distribution substation that would provide electric power to a new pipeline pumping station proposed by MPL.

Project Description

The Menahga Area Project (see map on back) would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line (see top photo) and approximately 2.5 miles will be single-circuit 115 kV line (see middle photo).
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing Minnesota Power Pipeline Substation and the proposed new Red Eye distribution substation.
- The proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing Minnesota Power Pipeline Substation.

The proposed transmission line would generally require a 100-foot-wide right-of-way, 50 feet on each side of the centerline. The majority of the project would use single round wood poles ranging in height from 60 - 90 feet above ground and a distance between poles of 275 - 400 feet. Poles with guy wires/anchors, two-pole H-frame or steel poles may be required in some areas as line angles, soil conditions, or crossing of existing utilities necessitate. Some segments of the line would carry lower-voltage distribution underbuild (see bottom photo).

Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and Route Permit before project construction can proceed. Great River Energy and Minnesota Power will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

Easements/Trees

Once project approval is granted by the Commission, Great River Energy will contact landowners to present an easement and offer of compensation. Most poles will be located on private property, although the majority of the right-of-way can continue to be used for agricultural cultivation, underground utilities, fencing and access drives. During acquisition, information is shared on tree removal, access and construction practices. Removal of trees and vegetation in the right-of-way will be necessary for safety and maintenance.

Project Schedule

Project contact and/or notifications	-----	Fall 2014
State permitting	-----	Early 2015 – early 2016
Survey/design	-----	Summer 2015 – Spring 2016
Easement acquisition/right-of-way permits	-----	Spring 2016 – Fall 2016
Transmission line construction	-----	Fall 2016 – Spring 2017
Energyization	-----	Spring 2017

For project updates and information, visit greatriverenergy.com/Menahga or contact:

Michelle Lommel
Sr. Field Representative
Great River Energy - Land Rights Department
(763) 445-5977 or 1-888-521-0130
mlommel@greenergy.com

Carole Schmidt
Supervisor, Transmission Permitting and Compliance
Great River Energy – Environmental Services Department
763-445-5214
cschmidt@greenergy.com



Typical 115 kV Wood
Double Circuit Structure

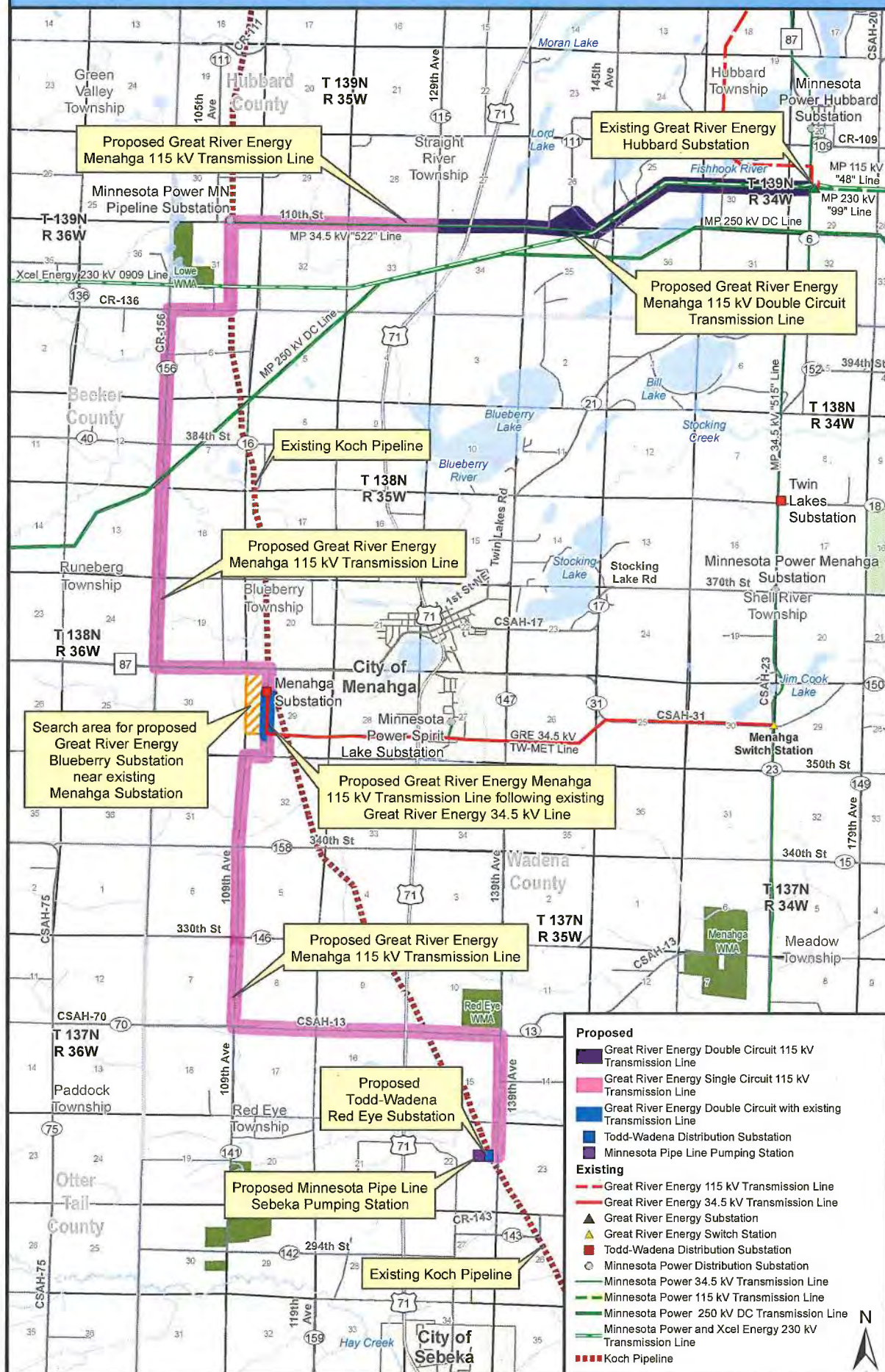


Typical 115 kV Wood
Single Circuit Structure



Typical 115 kV Wood
Structure with
Distribution Underbuild

Preliminary Project Study Area



Schmidt, Carole GRE-MG

From: Sorenson, Debra (DOT) [deb.sorenson@state.mn.us]
Sent: Tuesday, October 07, 2014 12:34 PM
To: Schmidt, Carole GRE-MG
Cc: Aguirre, Matthew (DOT); Huebsch, Catherine (DOT); Gaug, Ryan (DOT)
Subject: Proposed Menahga Area 115 kV Transmission Project

The project description Proposed Menahga Area 115 kV Transmission Project Early Notification Memo has been received and reviewed by the Office of Aeronautics and has been determined to have no significant effect to the operations at the any of the following airports - Park Rapids Municipal Airport Wadena Municipal Airport, New York Mills Municipal Airport.

Thank you for the opportunity to comment.

Debra Sorenson
Planning Coordinator
MNDOT Office of Aeronautics
651-234-7191
deb.sorenson@state.mn.us



GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 19, 2014

Ms. Sarah Belmers, Manager
Government Programs and Compliance
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102-1906

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Ms. Belmers:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission.

The proposed electric transmission improvement project in the Menahga area will serve two primary purposes:

- Strengthen the electric transmission system in the Menahga area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) Red Eye distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).

The Project will include:

- Construction of an east-west transmission line between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- Construction of a generally north-south transmission line between the existing Minnesota Power Pipeline Substation and the proposed new Todd-Wadena Red Eye distribution substation, which will be approximately 15.5 miles of primarily single-circuit 115 kV line.
- Construction of the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation and the new Todd-Wadena Red Eye Substation to serve the new MPL pumping station; and modifications to the existing Todd-Wadena Menahga Substation and the Minnesota Power Pipeline Substation.

Ms. Sarah Beimers
September 19, 2014
Page 2

If you would like to learn more about the project, an open house public meeting for the project will be held on:

September 30, 2014

4-7 p.m.

at:

**Menahga Senior Center
19 Cedar Ave. SE
Menahga, MN 56464**

Merjent conducted a Phase 1A Cultural Resources Assessment of the proposed Project (see enclosed letter). Merjent reported eight previously recorded archaeological sites and five previously recorded historic structures in the study area, although none overlap the proposed Menahga Area Project. Merjent recommended an archaeological inventory of the Project ROW once the route is defined, but recommended that an architectural review is not appropriate for the Project.

The project will likely require a Section 404 permit from the US Army Corps of Engineers (COE). If a permit is required, we understand the COE will initiate the Section 106 requirements and consult with the SHPO under your joint Programmatic Agreement.

A letter and fact sheet were sent to representatives of the White Earth Band of Ojibwe and the Leech Lake Band of Ojibwe.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5214. If you wish to respond by e-mail, my address is cschmidt@greenergy.com.

Thank you for your attention to this important project.

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures: Fact Sheet/Project Map, Letter of 9/19/14 from Merjent

Menahga Area 115 kV Transmission Project



Great River Energy
12300 Elm Creek Blvd
Maple Grove, MN 55369-4718
1-888-521-0130
www.greatriverenergy.com



**TODD-WADENA
ELECTRIC COOPERATIVE**

Todd-Wadena Electric Cooperative
550 Ash Avenue NE
Wadena, MN 56482
1-800-321-8932
www.toddwadena.coop

Project Need

Great River Energy proposes a new overhead 115 kilovolt (kV) transmission line project (Menahga Area Project) in Hubbard, Wadena and Becker Counties to relieve overload issues on the transmission system in the area and to serve a new pumping station to be built by Minnesota Pipe Line Company (MPL). The Menahga Area Project would:

- Strengthen the Menahga area electric transmission system, as the existing 34.5 kV system serving the area is becoming outdated and reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) "Red Eye" distribution substation that would provide electric power to a new pipeline pumping station proposed by MPL.

Project Description

The Menahga Area Project (see map on back) would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line (see top photo) and approximately 2.5 miles will be single-circuit 115 kV line (see middle photo).
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing Minnesota Power Pipeline Substation and the proposed new Red Eye distribution substation.
- The proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing Minnesota Power Pipeline Substation.

The proposed transmission line would generally require a 100-foot-wide right-of-way, 50 feet on each side of the centerline. The majority of the project would use single round wood poles ranging in height from 60 - 90 feet above ground and a distance between poles of 275 - 400 feet. Poles with guy wires/anchors, two-pole H-frame or steel poles may be required in some areas as line angles, soil conditions, or crossing of existing utilities necessitate. Some segments of the line would carry lower-voltage distribution underbuild (see bottom photo).

Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and Route Permit before project construction can proceed. Great River Energy and Minnesota Power will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

Easements/Trees

Once project approval is granted by the Commission, Great River Energy will contact landowners to present an easement and offer of compensation. Most poles will be located on private property, although the majority of the right-of-way can continue to be used for agricultural cultivation, underground utilities, fencing and access drives. During acquisition, information is shared on tree removal, access and construction practices. Removal of trees and vegetation in the right-of-way will be necessary for safety and maintenance.

Project Schedule

Project contact and/or notifications -----	Fall 2014
State permitting -----	Early 2015 – early 2016
Survey/design -----	Summer 2015 – Spring 2016
Easement acquisition/right-of-way permits -----	Spring 2016 – Fall 2016
Transmission line construction -----	Fall 2016 – Spring 2017
Energization -----	Spring 2017

For project updates and information, visit greatriverenergy.com/Menahga or contact:

Michelle Lommel
Sr. Field Representative
Great River Energy - Land Rights Department
(763) 445-5977 or 1-888-521-0130
mlommel@greenergy.com

Carole Schmidt
Supervisor, Transmission Permitting and Compliance
Great River Energy – Environmental Services Department
763-445-5214
cschmidt@greenergy.com



*Typical 115 kV Wood
Double Circuit Structure*

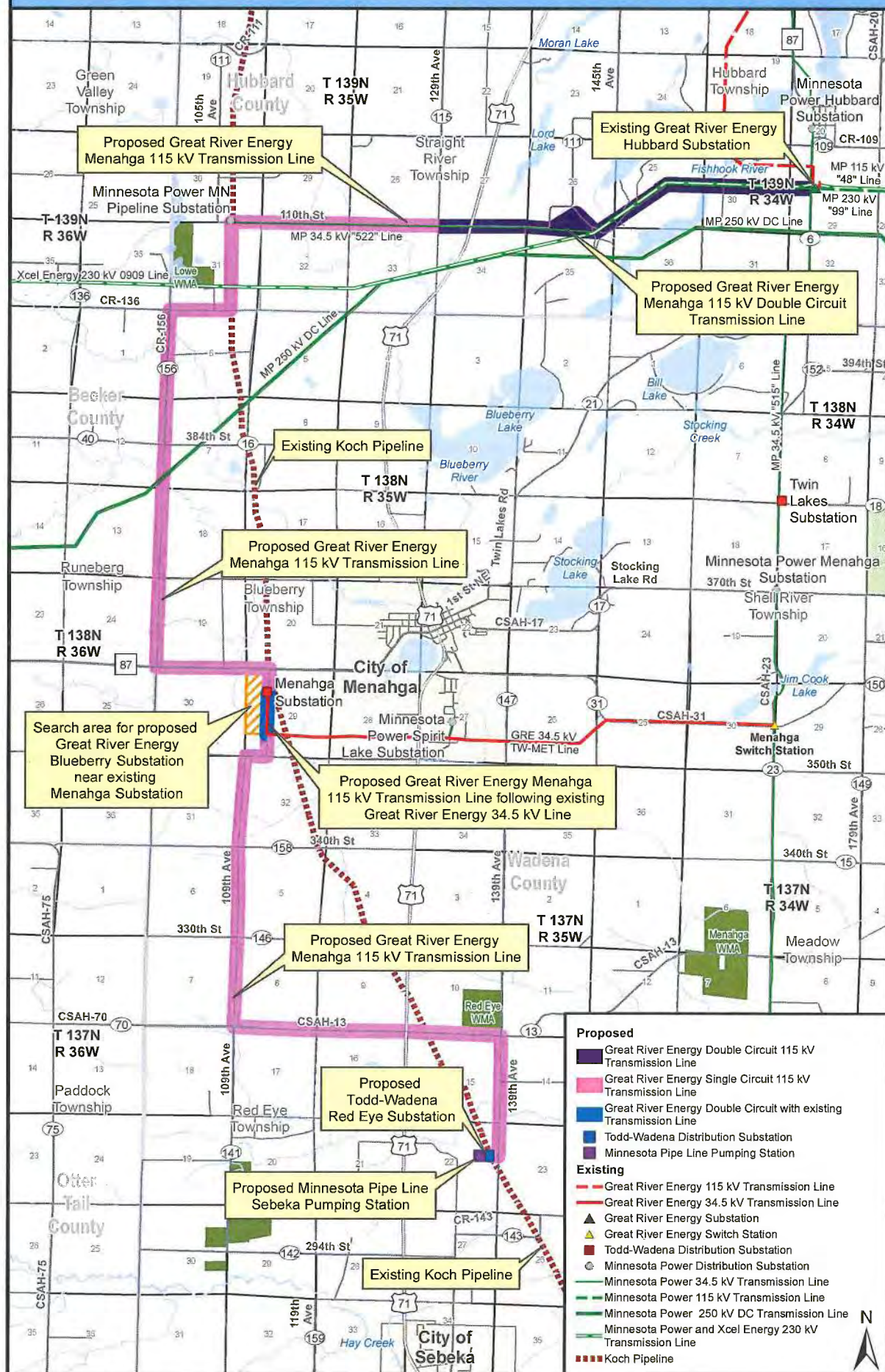


*Typical 115 kV Wood
Single Circuit Structure*



*Typical 115 kV Wood
Structure with
Distribution Underbuild*

Preliminary Project Study Area





September 19, 2014

Carole Schmidt
Supervisor, Transmission Permitting and Compliance
Great River Energy
12300 Elm Creek Boulevard
Maple Grove, MN 55369-4718

Re: Phase IA Cultural Resources Assessment of the proposed Menahga Area 115 kilovolt (kV) Transmission Line Project, Hubbard, Wadena and Becker Counties, Minnesota.

Dear Carole:

Merjent was contacted in September 2014 by Great River Energy to conduct a Phase IA Cultural Resources Assessment in support of the proposed Menahga Area 115 kilovolt (kV) Transmission Line Project (Menahga Area Project) in Hubbard, Wadena and Becker Counties, Minnesota. Great River Energy proposes construction of the line to strengthen the existing Menahga area electric transmission system and to provide service to a new Todd-Wadena Electric Cooperative (Todd-Wadena) distribution substation that would in turn provide electric power to a new pumping station to be built by Minnesota Pipe Line Company (MPL).

Project Description

The Menahga Area Project would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power (MP) Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing MP Pipeline Substation and the proposed new Red Eye Substation.
- New facilities or upgrades of existing facilities including: the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing MP Pipeline Substation.

Proposed Menahga Area Project activities may occur in the following counties and legal locations, which served as the Phase IA study area:

County	Township	Range	Sections
Hubbard	139N	34W	29, 30
Hubbard	139N	35W	25-35
Hubbard	139N	36W	36
Wadena	138N	35W	6-7, 18-20, 29-32
Becker	138N	36W	1, 12-13, 24-25
Wadena	137N	35W	5-10, 14-18, 22-23

Literature Review

The main objective in reviewing the cultural resources literature is to identify the recorded cultural sites and assess the potential for unrecorded sites within the study area. The standard for considering a cultural property as significant is whether it meets the criteria for listing on the National Register of Historic Places (NRHP). The initial criterion for such listing is an age of 50 or more years. Beyond age, a property must retain integrity and be associated with significant historic trends, historic persons, building styles and craftsmanship, or the property must have the potential to provide significant information about the past.

Merjent reviewed and followed the published guidelines for conducting cultural resources literature reviews in Minnesota. The Minnesota State Historic Preservation Office (SHPO), located in the Minnesota History Center in St. Paul, maintains the state's prehistoric and historic archaeological site files, historic standing structure inventory files, and field survey reports.

Merjent examined the current topographic maps and aerial photographs to understand the modern land use of the study area and to provide a baseline for examining the historic maps and documents. Merjent also examined primary sources that have been digitized and made available online, such as the original land survey maps and the original land patent records.

In September 2014 Merjent Cultural Resource Specialist Dan Born examined site files maintained at the Minnesota State Historic Preservation Office (SHPO).

Previously Recorded Archaeological Resources

Merjent identified eight (8) previously recorded archaeological sites in the study area.

Site Number/Site Name/Site Type	County, Location (TRS)	Site Significance	Location to Project
21HB0046/Hubbard Mill/Historic-period industry	Hubbard, 139N/34W/20	Unknown	North of project terminus at existing Great River Energy Hubbard Substation
21HB0047(e)/Hubbard Mounds/Pre-contact earthworks	Hubbard, 139N/34W/20	Protected under MN 307	North of project terminus at existing Great River Energy Hubbard Substation
21HB0085/Pre-contact single artifact	Hubbard, 139N/34W/36	Unknown	South of project; adjacent to existing MP 250 kV DC line
21HB0086/Pre-contact single artifact	Hubbard, 139N/34W/36	Unknown	South of project; adjacent to existing MP 250 kV DC line
21HB0087/Pre-contact lithic scatter	Hubbard, 139N/34W/36	Unknown	South of project; adjacent to existing MP 250 kV DC line
21HB0089/Pre-contact artifact scatter	Hubbard, 139N/34W/36	Unknown	South of project; adjacent to existing MP 250 kV DC line
21WD0025/Heino/Pre-contact artifact scatter	Wadena, 137N/35W/15	Unknown	West of single circuit 115 kV transmission line
21WDj/ Pre-contact earthworks	Wadena (Hubbard), 139N/35W/35 (138N/35W/2)	Unknown	South of project

Six of the eight archaeological sites are in Hubbard County and **none overlap the proposed Menahga Area Project**. The available information suggests that the locales crossed by the proposed Menahga Area Project in southern Hubbard and northern Wadena counties have a moderate to high potential to intersect currently non-recorded pre-contact archaeological sites, including artifact scatters and earthworks. Such resources are generally considered to have a greater potential to be significant; in addition, pre-contact earthworks are almost always protected under the Minnesota Private Cemeteries Act (MN 307.08). Two of the eight sites are in Wadena County (with one overlapping into Hubbard County, namely 21WDj) and suggests moderate potential to cross similar sites along the balance of the Menahga Area Project. Extant sites are more likely in areas not disturbed by historic and modern (non-agricultural) development.

Previously Recorded Standing Historic Structures

Merjent identified five previously recorded standing historic structures in the study area.

Site Number/Site Name/Site Type	County, Location (TRS)	Site Significance	Likely Location to Project
HB-HUB-002/Hubbard School	Hubbard, 139N/34W/20	Unknown	North of project
HB-HUB-003/United Methodist Church	Hubbard, 139N/34W/20	Unknown	North of project
HB-HUB-005/Bridge No. 8219	Hubbard, 139N/34W/30	Unknown	North of project
HB-SRT-002/Straight River Township Hall	Hubbard, 139N/35W/28	Unknown	North of project
WD-BLB-001/Blueberry Township School, Town Hall	Wadena, 139N/34W/36	Unknown	West of project

Five of the six previously recorded historic structures are in Hubbard County and **none appear to overlap the proposed Menahga Area Project**. The sixth previously recorded historic structure appears to be adjacent west of the search area for the proposed Great River Energy Blueberry Substation near the existing Menahga Substation. All six structures were inventoried during a 1986 county survey; it is unlikely that other structures in the vicinity have become notable since that time, at least enough to warrant additional inventory along the project alignment.

Conclusions

Merjent recommends that there will be no adverse impact on known or suspected cultural resources as a result of this project. However, given the relatively high site density along the northern reaches of Menahga Area Project alignment, Merjent recommends that Great River Energy sponsor an archaeological resources inventory effort to identify significant sites heretofore unknown, as well as any protected under MN 307.08, that could represent a delay to the project permitting or construction schedule. This inventory should include enough information to support site-specific significance assessments and inform location-specific routing decisions. Merjent believes that SHPO will share this opinion given the relatively high archaeological site density in the vicinity.

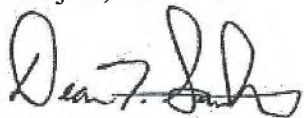
Given public and private development over the almost 30-year period since the 1985 survey, it is unlikely that additional structures would be identified that have not already had the opportunity. In addition, if these five or any other structures were truly significant, it is likely that previous public and private

developers over the past 30 years would have been tasked with evaluating the potential adverse effects of their projects. Merjent recommends that no architectural review is appropriate for this project.

Merjent recommends that if construction plans are altered to affect areas that were not previously surveyed or disturbed, these locations should be examined for cultural resources. Further, if human remains are encountered during construction activities, all ground disturbing activity must cease and local law enforcement must be notified per MN 307.08.

Please contact me at 612.924.3984 or Mike Madson at 612.834.3074 if you have questions.

Sincerely,
Merjent, Inc.

A handwritten signature in black ink, appearing to read "Dean T. Sather", written over a horizontal line.

Dean T. Sather, MA, RPA
Sr. Cultural Resource Specialist

Cc: Mike Madson, Merjent

RECEIVED OCT 23 2014



Using the Power of History to Transform Lives
PRESERVING > SHARING > CONNECTING

October 22, 2014

Ms. Carole Schmidt
Great River Energy
12300 Elm Creek Blvd
Maple Grove, MN 55369-4718

RE: Proposed Great River Energy Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties
SHPO Number: 2015-0028

Dear Ms. Schmidt:

Thank you for the opportunity to comment on the above project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

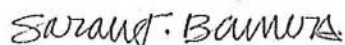
Due to the nature and location of the proposed project, we concur with your consultant's recommendation that a Phase I archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified.

We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson at (651) 259-3455.

Sincerely,



Sarah J. Belmers, Manager
Government Programs and Compliance

cc: Brad Johnson, USACE



GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 15, 2014

Mr. Andrew Horton, Habitat Conservation Biologist
United States Department of the Interior
Fish and Wildlife Service
Twin Cities Field Office
4101 American Blvd. East
Bloomington, MN 55425-1665

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Mr. Horton:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Menahga area will serve two primary purposes:

- Strengthen the electric transmission system in the Menahga area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) Red Eye distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).

The Project will include:

- Construction of an east-west transmission line between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- Construction of a generally north-south transmission line between the existing Minnesota Power Pipeline Substation and the proposed new Todd-Wadena Red Eye distribution substation, which will be approximately 15.5 miles of primarily single-circuit 115 kV line.
- Construction of the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation and the new Todd-Wadena Red Eye Substation to serve the new MPL pumping station; and modifications to the existing Todd-Wadena Menahga Substation and the Minnesota Power Pipeline Substation.

Mr. Andrew Horton
September 15, 2014
Page 2

If you would like to learn more about the project, an open house public meeting for the project will be held on:

September 30, 2014

4-7 p.m.

at:

Menahga Senior Center
19 Cedar Ave. SE
Menahga, MN 56464

The Fish and Wildlife Service website list for threatened and endangered species includes the Northern long-eared bat (proposed as endangered) in all three counties. Great River Energy does not believe the proposed transmission project will affect this species, but should it be listed, guidance associated with the bat will be considered.

The DNR Rare features database indicates the presence of the cowbane, kittentails and Blanding's turtles in the project area (see attached maps). These species will be evaluated further once a route is permitted, but we do not anticipate impacts to these species from construction of the project.

Great River Energy is requesting concurrence or information on the possible effects of the proposed project on any listed or proposed threatened or endangered species and designated or proposed critical habitat that may be present in the project area.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5214. If you wish to respond by e-mail, my address is cschmidt@greenergy.com.

Thank you for your attention to this important project.

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures: Fact Sheet/Project Map, Rare Features Maps

Menahga Area 115 kV Transmission Project



Great River Energy
12300 Elm Creek Blvd
Maple Grove, MN 55369-4718
1-888-521-0130
www.greatriverenergy.com



TODD-WADENA
ELECTRIC COOPERATIVE

Todd-Wadena Electric Cooperative
550 Ash Avenue NE
Wadena, MN 56482
1-800-321-8932
www.toddwadena.coop

Project Need

Great River Energy proposes a new overhead 115 kilovolt (kV) transmission line project (Menahga Area Project) in Hubbard, Wadena and Becker Counties to relieve overload issues on the transmission system in the area and to serve a new pumping station to be built by Minnesota Pipe Line Company (MPL). The Menahga Area Project would:

- Strengthen the Menahga area electric transmission system, as the existing 34.5 kV system serving the area is becoming outdated and reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) "Red Eye" distribution substation that would provide electric power to a new pipeline pumping station proposed by MPL.

Project Description

The Menahga Area Project (see map on back) would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line (see top photo) and approximately 2.5 miles will be single-circuit 115 kV line (see middle photo).
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing Minnesota Power Pipeline Substation and the proposed new Red Eye distribution substation.
- The proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing Minnesota Power Pipeline Substation.

The proposed transmission line would generally require a 100-foot-wide right-of-way, 50 feet on each side of the centerline. The majority of the project would use single round wood poles ranging in height from 60 - 90 feet above ground and a distance between poles of 275 - 400 feet. Poles with guy wires/anchors, two-pole H-frame or steel poles may be required in some areas as line angles, soil conditions, or crossing of existing utilities necessitate. Some segments of the line would carry lower-voltage distribution underbuild (see bottom photo).

Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and Route Permit before project construction can proceed. Great River Energy and Minnesota Power will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

Easements/Trees

Once project approval is granted by the Commission, Great River Energy will contact landowners to present an easement and offer of compensation. Most poles will be located on private property, although the majority of the right-of-way can continue to be used for agricultural cultivation, underground utilities, fencing and access drives. During acquisition, information is shared on tree removal, access and construction practices. Removal of trees and vegetation in the right-of-way will be necessary for safety and maintenance.

Project Schedule

Project contact and/or notifications	-----	Fall 2014
State permitting	-----	Early 2015 – early 2016
Survey/design	-----	Summer 2015 – Spring 2016
Easement acquisition/right-of-way permits	-----	Spring 2016 – Fall 2016
Transmission line construction	-----	Fall 2016 – Spring 2017
Energization	-----	Spring 2017

For project updates and information, visit greatriverenergy.com/Menahga or contact:

Michelle Lommel
Sr. Field Representative
Great River Energy - Land Rights Department
(763) 445-5977 or 1-888-521-0130
mlommel@grenergy.com

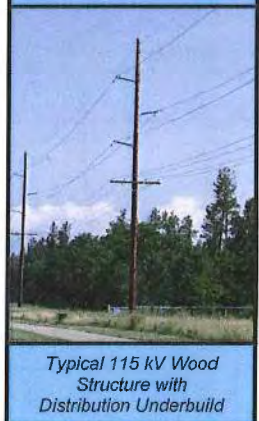
Carole Schmidt
Supervisor, Transmission Permitting and Compliance
Great River Energy – Environmental Services Department
763-445-5214
cschmidt@grenergy.com



Typical 115 kV Wood
Double Circuit Structure



Typical 115 kV Wood
Single Circuit Structure



Typical 115 kV Wood
Structure with
Distribution Underbuild

Preliminary Project Study Area

Proposed

- Great River Energy Double Circuit 115 kV Transmission Line
- Great River Energy Single Circuit 115 kV Transmission Line
- Great River Energy Double Circuit with existing Transmission Line
- Todd-Wadena Distribution Substation
- Minnesota Pipe Line Pumping Station

Existing

- Great River Energy 115 kV Transmission Line
- Great River Energy 34.5 kV Transmission Line
- Great River Energy Substation
- Great River Energy Switch Station
- Todd-Wadena Distribution Substation
- Minnesota Power Distribution Substation
- Minnesota Power 34.5 kV Transmission Line
- Minnesota Power 115 kV Transmission Line
- Minnesota Power 250 kV DC Transmission Line
- Minnesota Power and Xcel Energy 230 kV Transmission Line
- Koch Pipeline



GREAT RIVER ENERGY

A Touchstone Energy Cooperative

Proposed Great River Energy

115 kV Transmission Line

Existing Great River Energy

34.5 kV Transmission Line

115 kV Transmission Line

Transmission Substation

Existing Cooperative

Distribution Substation

Non-Great River Energy

34.5 kV Transmission Line

115 kV Transmission Line

230 kV Transmission Line

250 kV DC Transmission Line

Distribution Substation

MN Rare Natural Feature (NMHS)

Protection Status

Special Concern

Not listed

MN Sites of Biodiversity Significance

Biodiversity Significance

Moderate

Updated: 9/15/2014

Data Sources vary between

MNDOT, MNDNR, MNGEO

and Great River Energy

Rare Features Heritage data

from MNDNR

Topo scanned image maps

from the United States

Geological Survey (USGS)

ESRI Basemap service

Map Projection:

UTM, NAD83, Zone 15, Meters

*Copyright (2011), State of Minnesota,

Department of Natural Resources. Rare features

data included here were

provided by the Division of Ecological Resources,

Minnesota. Department of Natural Resources.

These data were current as of (8/4/2011).

The lack of data for any

geographic area shall not be construed to mean

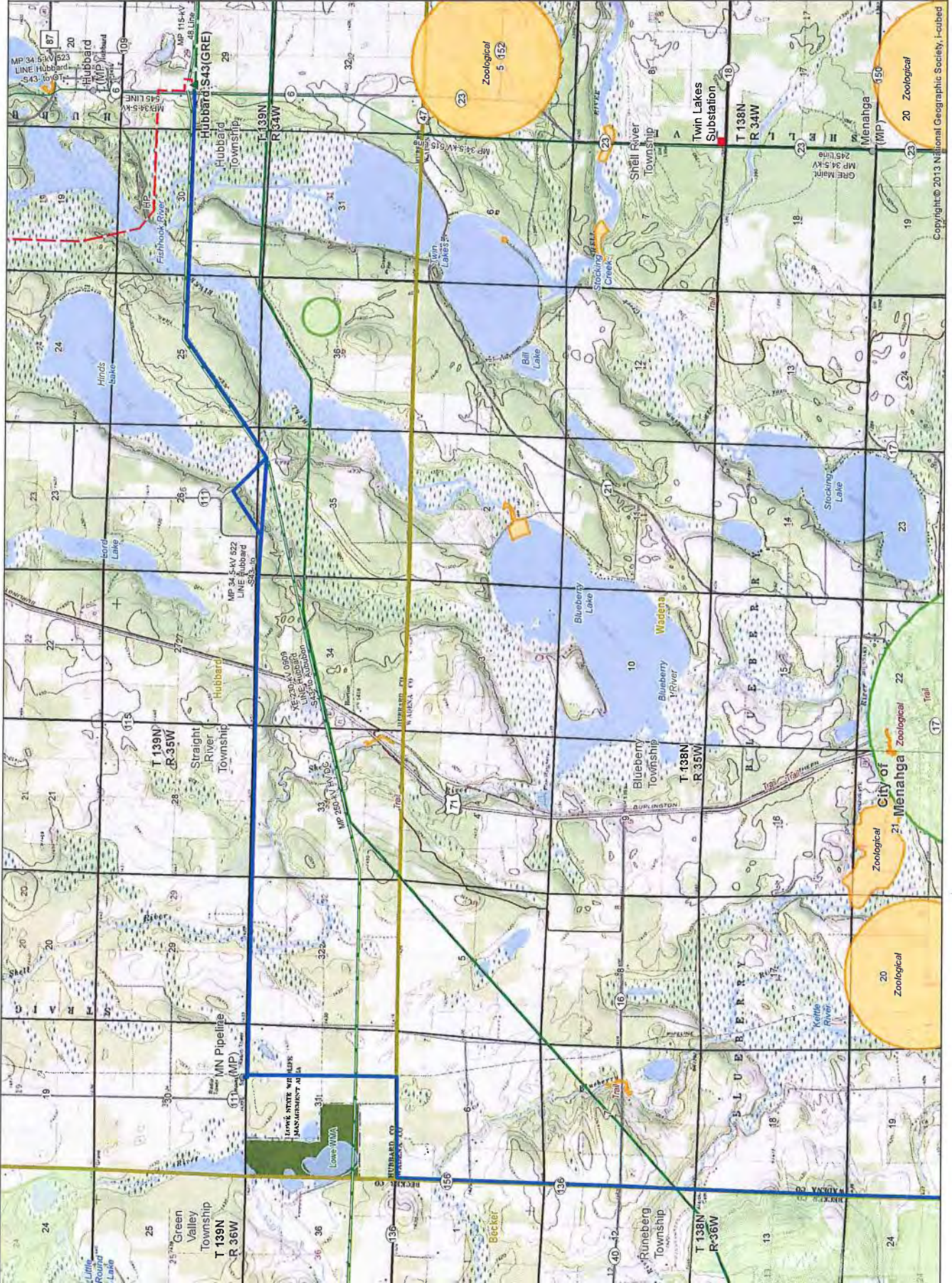
that no significant features are present.

0 1,000 2,000 Feet

N

Menahga Area 115 kV Project Map 1 of 2

Rare Features



Copyright © 2013 National Geographic Society, Inc.



**GREAT RIVER
ENERGY®**

A Techelectric Energy Cooperative

- Proposed Great River Energy
115 kV Transmission Line
Transmission Substation
Existing Great River Energy
34.5 kV Transmission Line
Proposed Cooperative
Distribution Substation
Existing Cooperative
Distribution Substation
Non-Great River Energy
34.5 kV Transmission Line
Distribution Substation
MN Rare Natural Feature (NHIS)
Protection Status
Special Concern
Threatened
Not listed
MN Sites of Biodiversity Significance
Biodiversity Significance

Moderate
MN Native Plant Community
Updated: 9/15/2014

Data Sources vary between
MNDOT, MNDNR, MNGEO
and Great River Energy
Rare Features Heritage data
from MNDNR
Topo scanned image maps
from the United States
Geological Survey (USGS)
ESRI Base map service
Map Projection:
UTM, NAD83, Zone 15, Meters

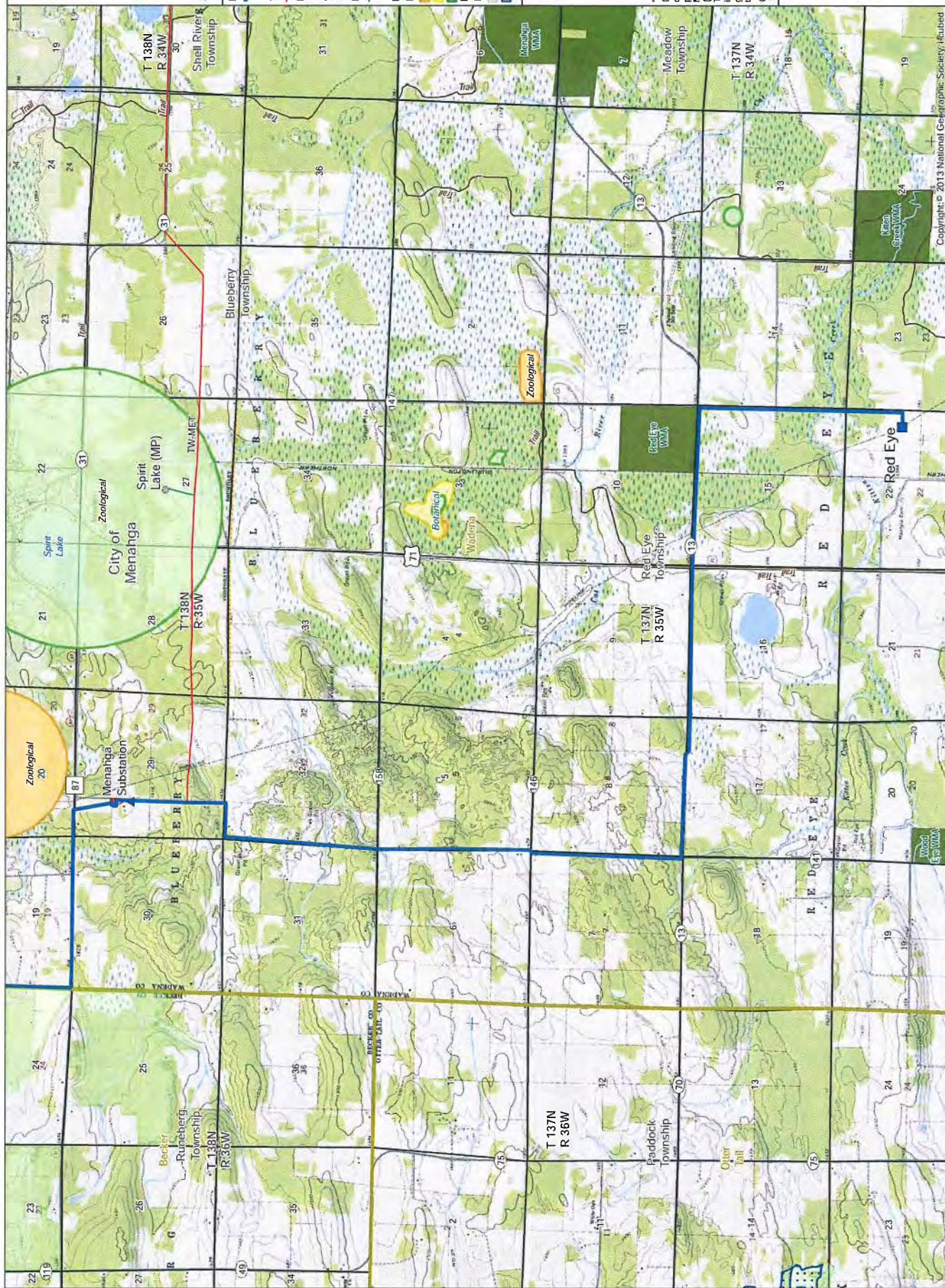
Copyright (2011), State of Minnesota,
Department of Natural Resources. Rare features
data included here were
provided by the Division of Ecological Resources,
Department of Natural Resources (DNR),
(DNR), and were current as of (04-15-2011).
These data are not based on an exhaustive
inventory of the state. The lack of data for any
geographic area shall not be construed to mean
that no significant features are present.

0 1,000 2,000 Feet

N

**Menahga Area
115 kV Project
Map 2 of 2**

**Rare
Features**



Copyright © 2013 National Geographic Society. Reprinted



GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 29, 2014

Mr. Andrew Horton, Habitat Conservation Biologist
United States Department of the Interior
Fish and Wildlife Service
Twin Cities Field Office
4101 American Blvd. East
Bloomington, MN 55425-1665

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Mr. Horton:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

In a letter sent to you dated 9-15-14, the rare features in the Project area were erroneously identified as Blanding's turtles, cowbane and kittentails. The correct rare features are Greater Prairie Chicken, Yellow Rail, and Hognose Snake. These species will be evaluated further once a route is permitted, but we do not anticipate impacts to these species from construction of the project. The enclosures submitted with the original letter remain the same.

Sincerely,

GREAT RIVER ENERGY

Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures: Fact Sheet/Project Map, Rare Features Maps

s:\legal\environmental\transmission\projects\Menahga Area Project\Agency Correspondence\MenahgaFWSltr2.doc

Schmidt, Carole GRE-MG

From: Horton, Andrew [andrew_horton@fws.gov]
Sent: Friday, October 17, 2014 12:48 PM
To: Schmidt, Carole GRE-MG
Subject: Menahga Area 115 kV Transmission Project

Ms. Schmidt,

I have reviewed the proposed transmission line located in Hubbard, Wadena and Becker County, Minnesota. As you have stated, the northern long-eared bat (*Myotis septentrionalis*) is proposed to be listed species in those counties. We have no known occurrence records in close proximity to the proposed action area, however, summer roosting habitat may be present. If removal of suitable habitat is anticipated after final listing and between April 1 and September 30, consultation may be necessary.

Construction of the single-circuit 115 kV line from the existing Minnesota Power Pipeline Substation to the proposed new Todd-Wadena Red Eye distribution substation passes in close proximity to USFWS interest property. The Marrs Farm Services Agency (FSA) easement and Red Eye Wildlife Management Area are located in the SE 1/4 of Section 10, Township 137N, Range 35W. Any new Right of Way (ROW) through these properties should be avoided. We recommend that if the final route is selected that utilizes the existing ROW adjacent to these properties, that bird flight diverters be placed on the transmission line and raptor perch deterrents be placed on power poles adjacent to those properties.

If project plans change, additional information on listed or proposed species becomes available, or new species are listed that may be affected by the project, consultation should be reinitiated. This concludes our review of the proposed construction at the above location. If you have any further endangered species questions, please contact me at (612) 725-3548 x2208.

Andrew Horton
Twin Cities Ecological Services Field Office
U.S. Fish and Wildlife Service
4101 American Blvd East
Bloomington, MN 55425-1665
(612) 725-3548 ext. 2208



GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 15, 2014

Ms. Lisa Joyal
Minnesota Department of Natural Resources
Natural Heritage and Nongame Research Program
500 Lafayette Road, Box 25
St. Paul, MN 55155

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Ms. Joyal:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Menahga area will serve two primary purposes:

- Strengthen the electric transmission system in the Menahga area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) Red Eye distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).

The Project will include:

- Construction of an east-west transmission line between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- Construction of a generally north-south transmission line between the existing Minnesota Power Pipeline Substation and the proposed new Todd-Wadena Red Eye distribution substation, which will be approximately 15.5 miles of primarily single-circuit 115 kV line.
- Construction of the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation and the new Todd-Wadena Red Eye Substation to serve the new MPL pumping station; and modifications to the existing Todd-Wadena Menahga Substation and the Minnesota Power Pipeline Substation.

Ms. Lisa Joyal
September 15, 2014
Page 2

If you would like to learn more about the project, an open house public meeting for the project will be held on:

September 30, 2014

4-7 p.m.

at:

**Menahga Senior Center
19 Cedar Ave. SE
Menahga, MN 56464**

The proposed transmission line will span several DNR public waters (see attached maps). Great River Energy will apply to the DNR Division of Lands and Minerals for a license to cross those waters.

There are a few rare features in the project area; primarily Blanding's turtles, cowbane and kittertails (see attached maps). These features will be evaluated in detail once a route is permitted. The proposed line is near the Red Eye WMA, but it is proposed to be on the opposite side of the road from the WMA.

Great River Energy is requesting information on the possible effects of the proposed project on these features and other important natural resources that occur in the project area. Please advise if there is specific guidance relative to the rare features in the area.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014.

If you have any questions about this proposed project, please contact me at (763) 445-5214. If you wish to respond by e-mail, my address is cschmidt@greenergy.com. Thank you for your attention to this important project

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

Enclosures: Fact Sheet/Project Map, PWI Maps, Rare Features Map

Menahga Area 115 kV Transmission Project



Great River Energy
12300 Elm Creek Blvd
Maple Grove, MN 55369-4718
1-888-521-0130
www.greatriverenergy.com



TODD-WADENA
ELECTRIC COOPERATIVE

Todd-Wadena Electric Cooperative
550 Ash Avenue NE
Wadena, MN 56482
1-800-321-8932
www.toddwadena.coop

Project Need

Great River Energy proposes a new overhead 115 kilovolt (kV) transmission line project (Menahga Area Project) in Hubbard, Wadena and Becker Counties to relieve overload issues on the transmission system in the area and to serve a new pumping station to be built by Minnesota Pipe Line Company (MPL). The Menahga Area Project would:

- Strengthen the Menahga area electric transmission system, as the existing 34.5 kV system serving the area is becoming outdated and reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) "Red Eye" distribution substation that would provide electric power to a new pipeline pumping station proposed by MPL.

Project Description

The Menahga Area Project (see map on back) would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line (see top photo) and approximately 2.5 miles will be single-circuit 115 kV line (see middle photo).
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing Minnesota Power Pipeline Substation and the proposed new Red Eye distribution substation.
- The proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing Minnesota Power Pipeline Substation.

The proposed transmission line would generally require a 100-foot-wide right-of-way, 50 feet on each side of the centerline. The majority of the project would use single round wood poles ranging in height from 60 - 90 feet above ground and a distance between poles of 275 - 400 feet. Poles with guy wires/anchors, two-pole H-frame or steel poles may be required in some areas as line angles, soil conditions, or crossing of existing utilities necessitate. Some segments of the line would carry lower-voltage distribution underbuild (see bottom photo).

Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and Route Permit before project construction can proceed. Great River Energy and Minnesota Power will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

Easements/Trees

Once project approval is granted by the Commission, Great River Energy will contact landowners to present an easement and offer of compensation. Most poles will be located on private property, although the majority of the right-of-way can continue to be used for agricultural cultivation, underground utilities, fencing and access drives. During acquisition, information is shared on tree removal, access and construction practices. Removal of trees and vegetation in the right-of-way will be necessary for safety and maintenance.

Project Schedule

Project contact and/or notifications	Fall 2014
State permitting	Early 2015 – early 2016
Survey/design	Summer 2015 – Spring 2016
Easement acquisition/right-of-way permits	Spring 2016 – Fall 2016
Transmission line construction	Fall 2016 – Spring 2017
Energization	Spring 2017

For project updates and information, visit greatriverenergy.com/Menahga or contact:

Michelle Lommel
Sr. Field Representative
Great River Energy - Land Rights Department
(763) 445-5977 or 1-888-521-0130
mlommel@grenergy.com

Carole Schmidt
Supervisor, Transmission Permitting and Compliance
Great River Energy – Environmental Services Department
763-445-5214
cschmidt@grenergy.com



Typical 115 kV Wood
Double Circuit Structure

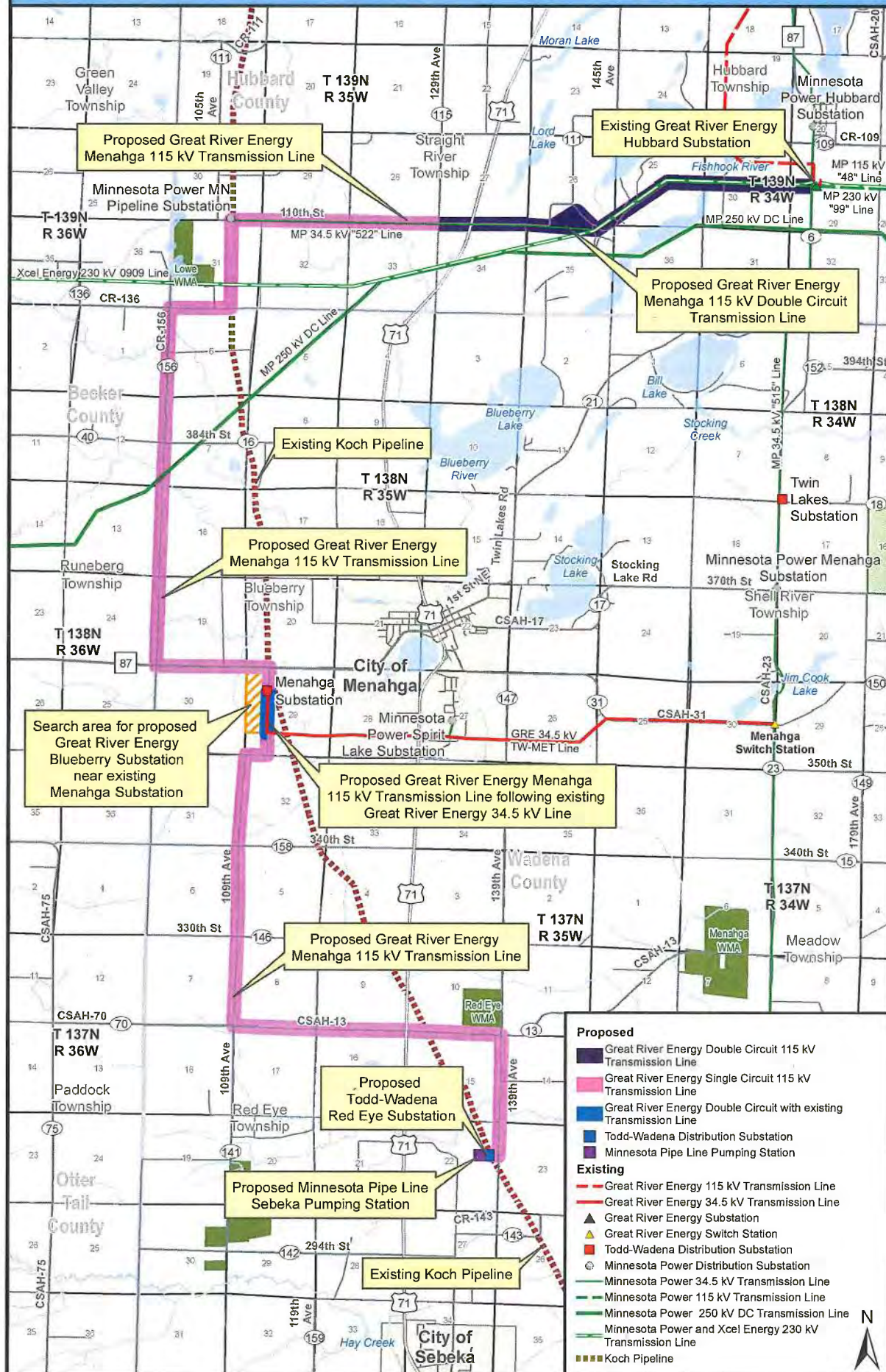


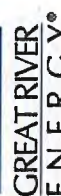
Typical 115 kV Wood
Single Circuit Structure



Typical 115 kV Wood
Structure with
Distribution Underbuild

Preliminary Project Study Area





A Touchstone Energy® Cooperative

- Proposed Great River Energy**
 115 kV Transmission Line
Existing Great River Energy
 34.5 kV Transmission Line
 115 kV Transmission Line
 Transmission Substation
Existing Cooperative
 Distribution Substation
Non-Great River Energy
 34.5 kV Transmission Line
 115 kV Transmission Line
 230 kV Transmission Line
 250 kV DC Transmission Line
 Distribution Substation
NM Wetlands
 Freshwater Emergent Wetland
 Freshwater Forest/
 Freshwater Pond
 Lake
 Raine
NM Public Waters Inventory (PWI)
 Public Water Wetland
 Public Water Basin
 NM Public Watercourse
 NM Public Watercourse
 NM MPCA Impaired Lakes

Updated: 9/15/2014

Data Sources vary between MNDOT, MNDNR, MNGEO and Great River Energy

Aerial Imagery form:
ESRI World Imagery
Basemap service

Map Projection:
UTM, NAD83, Zone 15, Meters

0 2,000 4,000 Feet

N

**Menahga Area
115 kV Project
Map 1 of 2**

NWI Wetlands and Hydrologic Features





**GREAT RIVER
ENERGY®**

A Techline Energy Cooperative

- Proposed Great River Energy
115 kV Transmission Line
▲ Transmission Substation
▲ Existing Great River Energy
34.5 kV Transmission Line
Proposed Cooperative
Distribution Substation
Existing Cooperative
Distribution Substation
Non-Great River Energy
34.5 kV Transmission Line
○ Distribution Substation
NW Wetlands
Freshwater Emergent Wetland
Freshwater Forested/
Shrub Wetland
Lake
Public Waters Inventory (PWI)
Public Water Wetland
Public Water Basin
NW Public Watercourse

Updated: 9/15/2014

Data Sources vary between
MNDOT, MNDNR, MNGEO
and Great River Energy

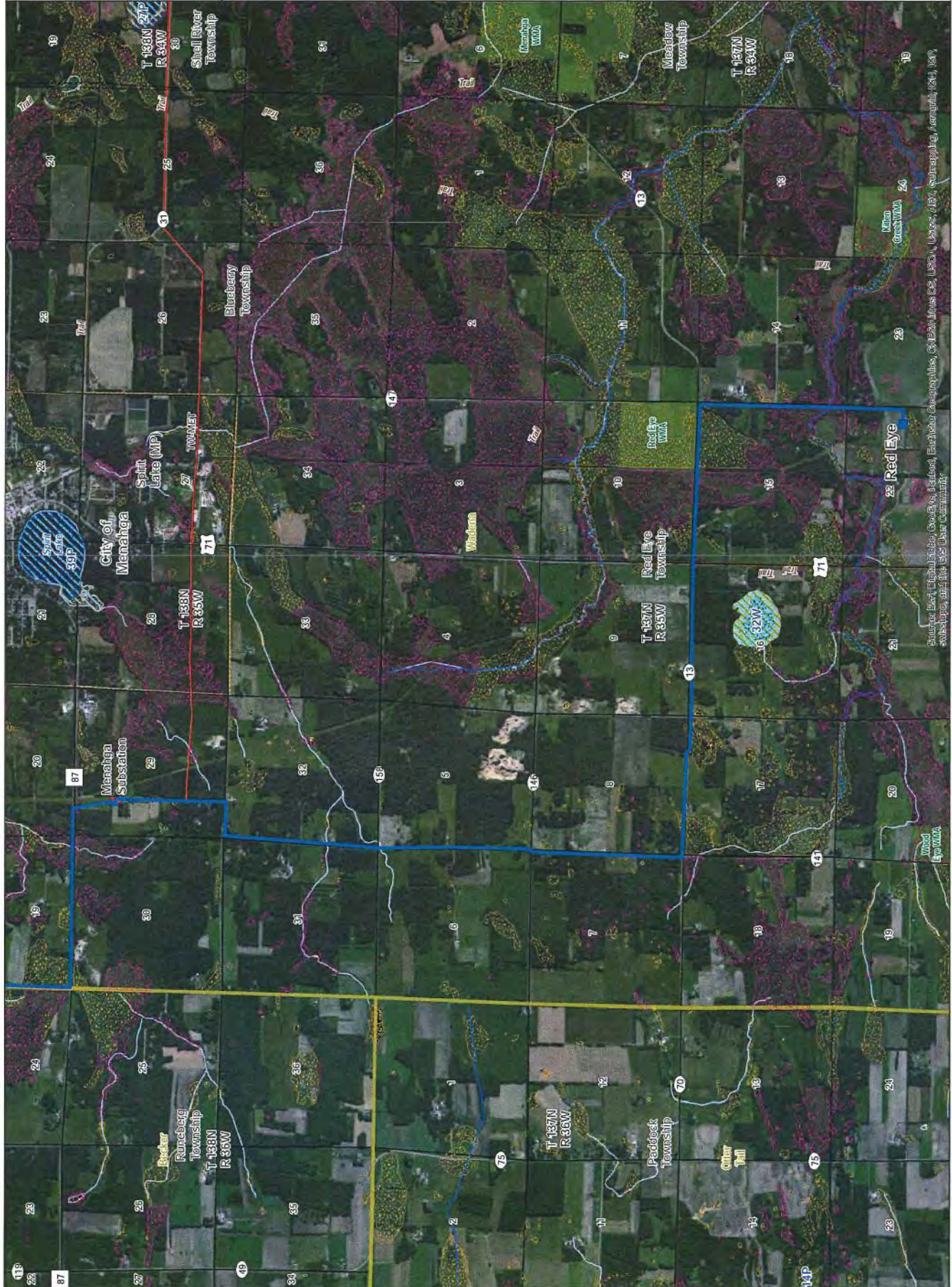
Aerial Imagery from:
ESRI World Imagery
BaseMap service

Map Projection:
UTM, NAD83, Zone 15, Meters

0 2,000 4,000 Feet

Menahga Area
115 kV Project
Map 2 of 2

NWI Wetlands and
Hydrologic Features





Proposed Great River Energy
 ■ 115 kV Transmission Line
Existing Great River Energy
 ■ 34.5 kV Transmission Line
 ■ 115 kV Transmission Line
 ▲ Transmission Substation

Existing Cooperative
 ■ Distribution Substation
 ■ Non-Great River Energy
 ■ 34.5 kV Transmission Line
 ■ 115 kV Transmission Line
 ■ 230 kV Transmission Line
 ■ 250 kV DC Transmission Line
 ● Distribution
 ■ MN Rare Natural Feature (NHS)
 ■ Protection Status

Special Concern
 ■ Not listed
 ■ MN Sites of Biodiversity Significance
 ■ Biodiversity Significance
 ■ Moderate

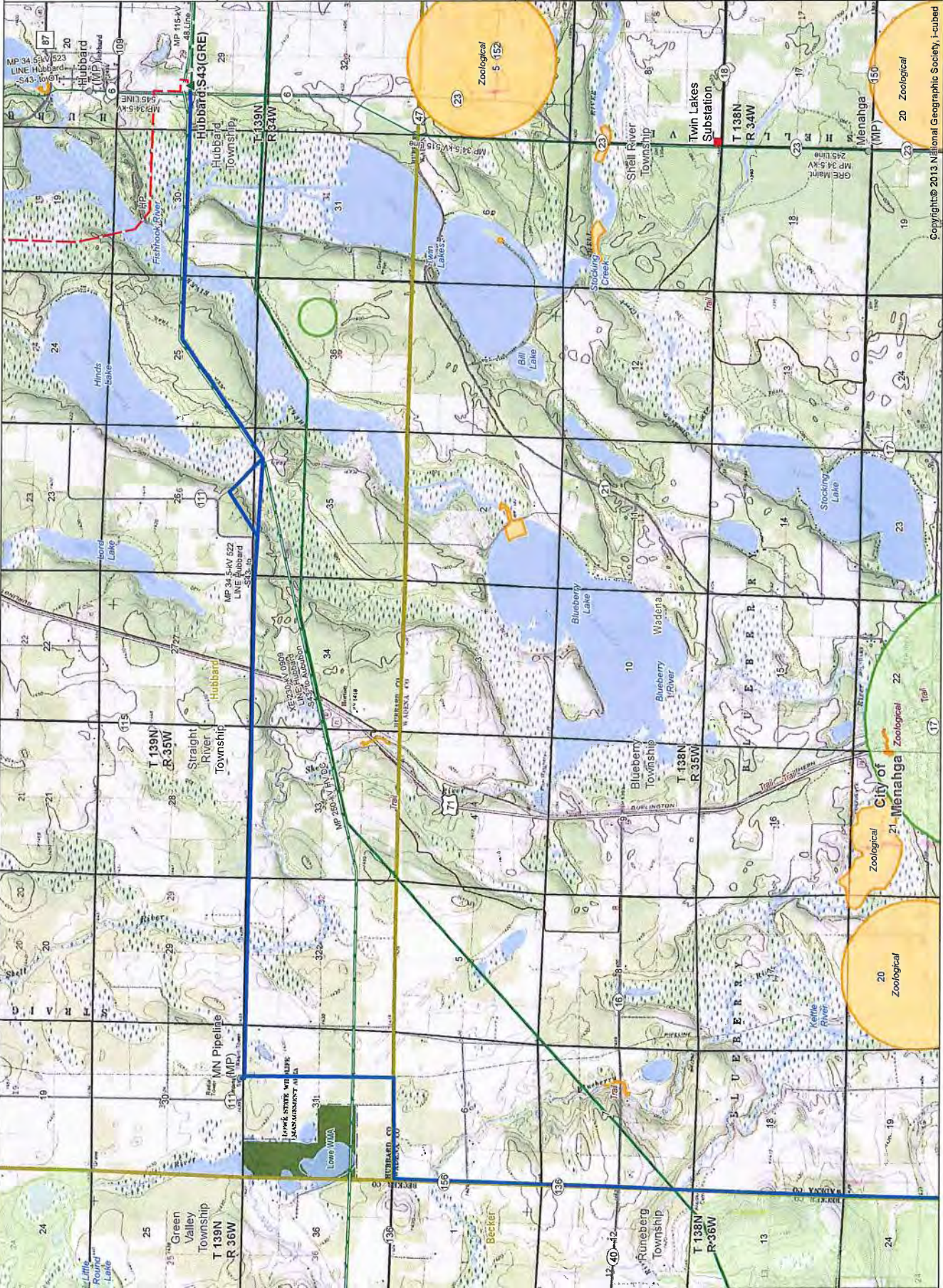
Updated: 9/15/2014

Data Sources vary by between MINOT, MINDR, INGEO and Natural Energy. Raster data were derived from the National Wetlands Inventory data from MINDR. Topo scanned image maps from the United States Geological Survey (USGS) ESRI Base map service. Map Projection: UTM, NAD83, Zone 15, Seters of Minnesota. Department of Natural Resources. Raster features data included here were provided by the Division of Ecological Resources, Minnesota Department of Natural Resources. (CNR) and were current as of (04-19-2011). These data are not based on an extensive ground truthing effort. The geographic area shall not be construed to mean that no significant features are present.

0 1,000 2,000 Feet

**Menahga Area
115 kV Project
Map 1 of 2**

Rare Features



Copyright:© 2013 National Geographic Society, i-cubed



**GREAT RIVER
ENERGY**

A Touchstone Energy Cooperative

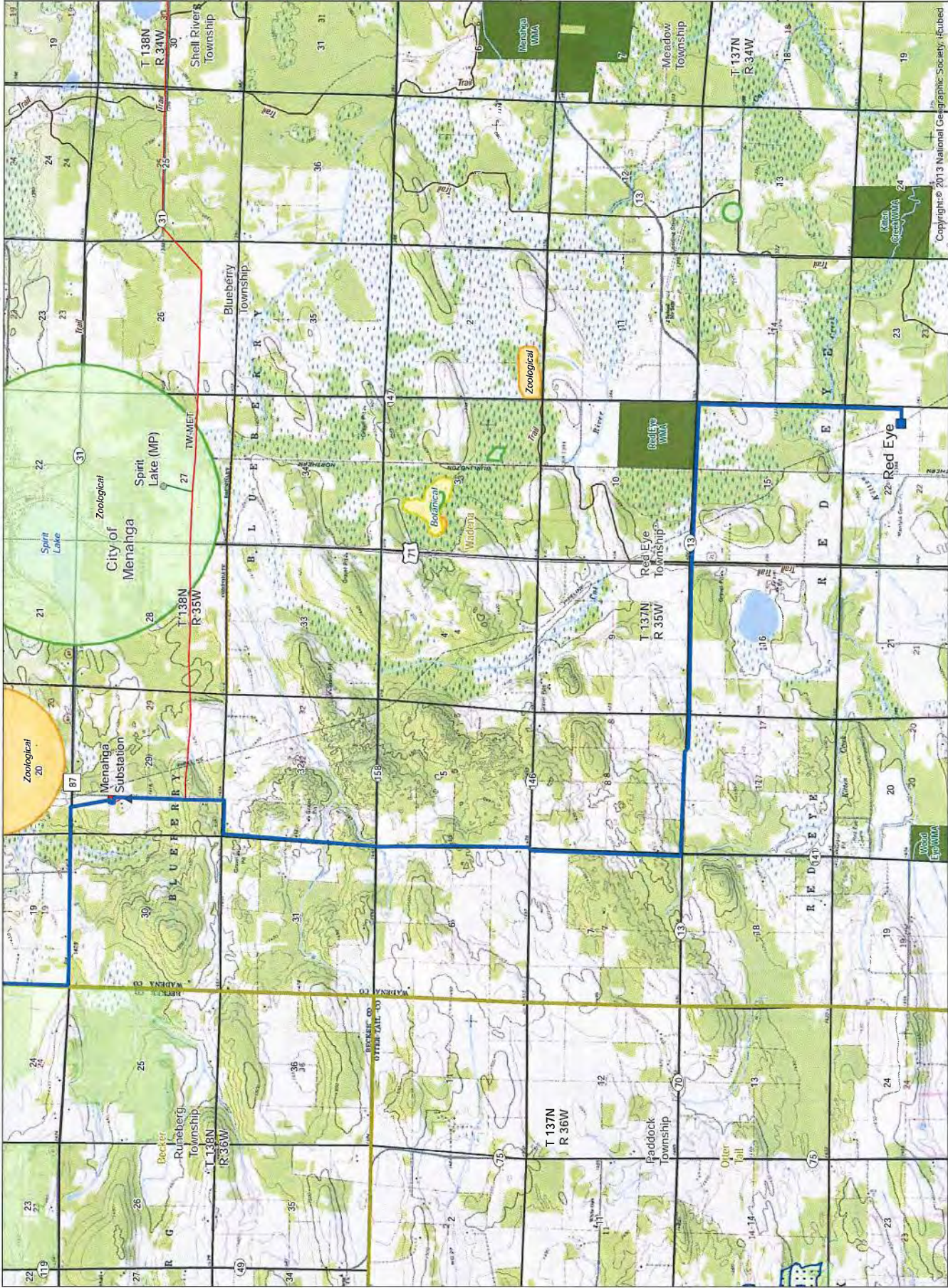
- Proposed Great River Energy
115 kV Transmission Line
▲ Transmission Substation
Existing Great River Energy
34.5 kV Transmission Line
Proposed Cooperative
Distribution Substation
Existing Cooperative
Distribution Substation
Non-Great River Energy
34.5 kV Transmission Line
● Distribution Substation
MN Rare Natural Feature (NHIS)
Protection Status
Special Concern
Threatened
Not listed
MN Sites of Biodiversity Significance
Biodiversity Significance
Moderate
WN Native Plant Community
Updated: 9/13/2014

Data Sources vary between
MNDOT, MNDNR, MNGEO
and Great River Energy
Rare Features Heritage data
from MNDNR
Topo scanned image maps
from the United States
Geological Survey (USGS)
ESRI Basemap service
Map Projection:
UTM, NAD83, Zone 15, Meters
Copyright (2011), State of Minnesota,
Department of Natural Resources. Rare features
data included here were
provided by the Division of Ecological Resources,
Minnesota Department of Natural Resources
(DNR), (6/13/2011).
These data are not based on an exhaustive
inventory of the state. The lack of data for any
geographic area shall not be construed to mean
that no significant features are present.

0 1,000 2,000 Feet

**Menahga Area
115 kV Project
Map 2 of 2**

**Rare
Features**





GREAT RIVER
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • greatriverenergy.com

September 29, 2014

Ms. Lisa Joyal
Minnesota Department of Natural Resources
Natural Heritage and Nongame Research Program
500 Lafayette Road, Box 25
St. Paul, MN 55155

RE: Proposed Menahga Area 115 kV Transmission Project
Hubbard, Wadena and Becker Counties

Dear Ms. Joyal:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

In a letter sent to you dated 9-15-14, the rare features in the Project area were erroneously identified as Blanding's turtles, cowbane and kittentails. The correct rare features are Greater Prairie Chicken, Yellow Rail, and Hognose Snake. The enclosures submitted with the original letter remain the same.

Great River Energy has assessed potential impacts to these features and has determined that based on the distance between the proposed Project and these features, no impacts are anticipated. The proposed transmission line is near some areas of moderate biodiversity and the Red Eye WMA, but it is proposed to be on the opposite side of the road from these features and no impacts are anticipated.

Great River Energy is requesting concurrence from the DNR regarding our assessment of impacts to rare features in the Project area. Please advise if there is specific guidance relative to the particular rare features in the area. Once a route permit is issued, Great River Energy will evaluate these features in detail and coordinate with the DNR if necessary.

Sincerely,

GREAT RIVER ENERGY

Carole L. Schmidt
Supervisor, Transmission Permitting and Compliance

s:\legal\environmental\transmission\projects\Menahga Area Project\Agency Correspondence\MenahgaDNRltr2.doc

Schmidt, Carole GRE-MG

From: Joyal, Lisa (DNR) [Lisa.Joyal@state.mn.us]
Sent: Wednesday, December 17, 2014 3:34 PM
To: Schmidt, Carole GRE-MG
Subject: Menahga Area 115 kV Transmission Line
Attachments: Menahga DNR letter 2 9-29-14.pdf; MenahgaRareFeaturesMap_20140915.pdf

I have reviewed the attached documents regarding the above project. Please note the following:

- There are old growth remnants north and south of the existing transmission corridor in T139N R34W Section 30. If there will be any disturbance outside the existing corridor, this old growth could be impacted. Old-growth forests are natural forests that have developed over a long period of time, generally at least 120 years, without experiencing severe, stand-replacing disturbances such as fires, windstorms, or logging. Old-growth forests are a unique, nearly vanished piece of Minnesota's history and ecology; less than 5% of Minnesota's old-growth forests remain. For more information on old-growth forests, please visit http://www.dnr.state.mn.us/forests_types/oldgrowth/index.html. Given the ecological significance of these stands, we recommend that measures be implemented to avoid or minimize disturbance.
- In T139N R34W Sections 30 and T139N R35W Section 25, 26, & 35, the proposed line is within an area that the Minnesota Biological Survey has identified as a Site of Moderate Biodiversity Significance. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Sites ranked as Moderate contain occurrences of rare species and/or moderately disturbed native plant communities, and/or landscapes that have a strong potential for recovery. This particular Site was visited in 2006 and contains several occurrences of Jack Pine – (Bush Honeysuckle) Woodland, a rare native plant community, adjacent to the existing transmission corridor.

Given the ecological significance of this area, disturbance within the MBS Site should be minimized to the extent feasible. Actions to minimize disturbance may include, but are not limited to, the following recommendations:

- As much as possible, operate within already-disturbed areas;
 - Minimize vehicular disturbance in the area (allow only vehicles/equipment necessary for pipeline removal and installation);
 - Do not park equipment or stockpile supplies in the area;
 - Do not place spoil within MBS Sites or other sensitive areas;
 - Inspect and clean all equipment prior to bringing it to the site to prevent the introduction and spread of invasive species;
 - If possible, conduct the work under frozen ground conditions;
 - Use effective erosion prevention and sediment control measures;
 - Revegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible; and
 - Use only weed-free mulches, topsoils, and seed mixes.
- The proposed line is also adjacent to other Sites of Moderate Biodiversity Significance (GIS shapefiles of MBS Sites of Biodiversity Significance and MBS Native Plant Communities can be downloaded from the DNR Data Deli at <http://deli.dnr.state.mn.us>). Given that construction activities can negatively affect adjacent native plant communities, especially through the introduction of invasive plant species, disturbance near these ecologically significant areas should be minimized. Actions to minimize disturbance can be found in the above bullet.
 - State-listed mussels of special concern have been documented in Kettle Creek and the Blueberry River in the vicinity of the proposed crossings. As mussels are particularly vulnerable to deterioration in water quality,

especially increased siltation, it is important that effective erosion prevention and sediment control practices be implemented and maintained near these waterways.

The reference number for this correspondence is ERDB #20150073-0002.

Thank you for notifying us of this project, and for the opportunity to provide comments.

Please accept my apologies for the slow turnaround on this request.

Sincerely,

Lisa Joyal

~~~~~  
Lisa Joyal  
Endangered Species Review Coordinator  
NHIS Data Distribution Coordinator  
Division of Ecological and Water Resources  
Minnesota Department of Natural Resources  
500 Lafayette Road, Box 25  
St. Paul, MN 55155

phone: 651-259-5109  
[lisa.joyal@state.mn.us](mailto:lisa.joyal@state.mn.us)  
[www.mndnr.gov/eco](http://www.mndnr.gov/eco)





GREAT RIVER  
ENERGY®

12300 Elm Creek Boulevard • Maple Grove, Minnesota 55369-4718 • 763-445-5000 • Fax 763-445-5050 • [greatriverenergy.com](http://greatriverenergy.com)

September 15, 2014

Mr. Robert Maroney  
US Army Corps of Engineers  
St. Paul District  
180 5<sup>th</sup> Street East, Suite 700  
St. Paul, MN 55101-1678

RE: Proposed Menahga Area 115 kV Transmission Project  
Hubbard, Wadena and Becker Counties

Dear Mr. Maroney:

Great River Energy is currently gathering data to be used in preparation of regulatory applications necessary to obtain approvals and permits for the construction of the proposed Menahga Area 115 kilovolt (kV) Transmission Project in Hubbard, Wadena and Becker counties (see enclosed fact sheet and map). Great River Energy and Minnesota Power intend to seek a Certificate of Need and a Route Permit for the Project from the Minnesota Public Utilities Commission (Commission).

The proposed electric transmission improvement project in the Menahga area will serve two primary purposes:

- Strengthen the electric transmission system in the Menahga area, as the existing 34.5 kV system serving the area is becoming outdated and is reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) Red Eye distribution substation that would provide electric power to a new pipeline pumping station proposed by Minnesota Pipe Line Company (MPL).

The Project will include:

- Construction of an east-west transmission line between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line and approximately 2.5 miles will be single-circuit 115 kV line.
- Construction of a generally north-south transmission line between the existing Minnesota Power Pipeline Substation and the proposed new Todd-Wadena Red Eye distribution substation, which will be approximately 15.5 miles of primarily single-circuit 115 kV line.
- Construction of the proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation and the new Todd-Wadena Red Eye Substation to serve the new MPL pumping station; and modifications to the existing Todd-Wadena Menahga Substation and the Minnesota Power Pipeline Substation.

Mr. Robert Maroney  
September 15, 2014  
Page 2

If you would like to learn more about the project, an open house public meeting for the project will be held on:

**September 30, 2014**

**4-7 p.m.**

at:

Menahga Senior Center  
19 Cedar Ave. SE  
Menahga, MN 56464

Great River Energy is requesting information on the possible effects of the proposed project on floodplains, wetlands, and other important natural resources that occur in the project area. The transmission line will span several DNR public waters (see enclosed maps). Great River Energy will apply to the DNR Division of Lands and Minerals for a license to cross those waters.

The project will cross a number of NWI wetlands (see enclosed maps), many of which will be spanned. Great River Energy will work with the Corps and the counties to address impacts once design details are available.

A literature survey of cultural resources in the project area is currently being conducted by Merjent.

We would appreciate receiving any written comments from your office by Friday, October 17, 2014. If you have any questions about this proposed project, please contact me at (763) 445-5214. If you wish to respond by e-mail, my address is [cschmidt@grenergy.com](mailto:cschmidt@grenergy.com).

Thank you for your attention to this important project.

Sincerely,

GREAT RIVER ENERGY



Carole L. Schmidt  
Supervisor, Transmission Permitting and Compliance  
763-445-5214

Enclosures: Fact Sheet/Project Map, PWI/NWI Maps

s:\legal\environmental\transmission\projects\Menahga Area Project\Agency Correspondence\MenahgaCOEltr.doc



# Menahga Area 115 kV Transmission Project



**Great River Energy**  
12300 Elm Creek Blvd  
Maple Grove, MN 55369-4718  
1-888-521-0130  
[www.greatriverenergy.com](http://www.greatriverenergy.com)



**TODD-WADENA  
ELECTRIC COOPERATIVE**

**Todd-Wadena Electric Cooperative**  
550 Ash Avenue NE  
Wadena, MN 56482  
1-800-321-8932  
[www.toddwadena.coop](http://www.toddwadena.coop)

## Project Need

Great River Energy proposes a new overhead 115 kilovolt (kV) transmission line project (Menahga Area Project) in Hubbard, Wadena and Becker Counties to relieve overload issues on the transmission system in the area and to serve a new pumping station to be built by Minnesota Pipe Line Company (MPL). The Menahga Area Project would:

- Strengthen the Menahga area electric transmission system, as the existing 34.5 kV system serving the area is becoming outdated and reaching its maximum capacity.
- Provide electric service to the proposed new Todd-Wadena Electric Cooperative (Todd-Wadena) "Red Eye" distribution substation that would provide electric power to a new pipeline pumping station proposed by MPL.

## Project Description

The Menahga Area Project (see map on back) would consist of:

- An east-west section between the existing Great River Energy Hubbard Substation and the existing Minnesota Power Pipeline Substation, of which approximately 4.5 miles will be double-circuit 115 kV line (see top photo) and approximately 2.5 miles will be single-circuit 115 kV line (see middle photo).
- A generally north-south section of primarily single-circuit 115 kV line (approximately 15.5 miles) between the existing Minnesota Power Pipeline Substation and the proposed new Red Eye distribution substation.
- The proposed new Great River Energy Blueberry Substation in the vicinity of the existing Menahga Substation; the proposed new Todd-Wadena Red Eye Substation; conversion of Todd-Wadena's existing Menahga 34.5 kV distribution substation to operate at 115 kV; and modifications to the existing Minnesota Power Pipeline Substation.

The proposed transmission line would generally require a 100-foot-wide right-of-way, 50 feet on each side of the centerline. The majority of the project would use single round wood poles ranging in height from 60 - 90 feet above ground and a distance between poles of 275 - 400 feet. Poles with guy wires/anchors, two-pole H-frame or steel poles may be required in some areas as line angles, soil conditions, or crossing of existing utilities necessitate. Some segments of the line would carry lower-voltage distribution underbuild (see bottom photo).

## Permitting

The Minnesota Public Utilities Commission (Commission) must issue a Certificate of Need (CON) and Route Permit before project construction can proceed. Great River Energy and Minnesota Power will submit a combined CON/Route Permit application containing relevant information that will help the Commission determine if there is sufficient need for the project and evaluate the proposed route and any alternative routes brought forth by the public. At the conclusion of the permitting process, the Commission will determine the final location of the proposed transmission facilities.

The public and regulatory agencies will have numerous opportunities to provide input during the CON and Route Permitting process, which is conducted and facilitated by Commission and Minnesota Department of Commerce (DOC) staff. Public meetings will be held and other opportunities will be provided for collecting comments and responses. The DOC will prepare an Environmental Assessment document for the project.

## Easements/Trees

Once project approval is granted by the Commission, Great River Energy will contact landowners to present an easement and offer of compensation. Most poles will be located on private property, although the majority of the right-of-way can continue to be used for agricultural cultivation, underground utilities, fencing and access drives. During acquisition, information is shared on tree removal, access and construction practices. Removal of trees and vegetation in the right-of-way will be necessary for safety and maintenance.

## Project Schedule

|                                           |       |                           |
|-------------------------------------------|-------|---------------------------|
| Project contact and/or notifications      | ----- | Fall 2014                 |
| State permitting                          | ----- | Early 2015 – early 2016   |
| Survey/design                             | ----- | Summer 2015 – Spring 2016 |
| Easement acquisition/right-of-way permits | ----- | Spring 2016 – Fall 2016   |
| Transmission line construction            | ----- | Fall 2016 – Spring 2017   |
| Energization                              | ----- | Spring 2017               |

**For project updates and information, visit [greatriverenergy.com/Menahga](http://greatriverenergy.com/Menahga) or contact:**

Michelle Lommel  
Sr. Field Representative  
Great River Energy - Land Rights Department  
(763) 445-5977 or 1-888-521-0130  
[mlommel@grenergy.com](mailto:mlommel@grenergy.com)

Carole Schmidt  
Supervisor, Transmission Permitting and Compliance  
Great River Energy – Environmental Services Department  
763-445-5214  
[cschmidt@grenergy.com](mailto:cschmidt@grenergy.com)



*Typical 115 kV Wood  
Double Circuit Structure*



*Typical 115 kV Wood  
Single Circuit Structure*



*Typical 115 kV Wood  
Structure with  
Distribution Underbuild*





A Touchstone Energy® Cooperative

- Proposed Great River Energy  
115 kV Transmission Line  
▲ Transmission Substation  
Existing Great River Energy  
34.5 kV Transmission Line  
● Proposed Cooperative  
● Distribution Substation  
Existing Cooperative  
● Distribution Substation  
Non-Great River Energy  
34.5 kV Transmission Line  
● Distribution Substation  
NMW Wetlands  
Freshwater Emergent Wetland  
Freshwater Forested/  
Freshwater Pond  
Lake  
NMN Public Waters Inventory (PWI)  
NMN Public Water Wetland  
NMN Public Water Basin  
NMN Public Watercourse

Updated: 9/15/2014

Data Sources vary between MNDOT, MNDNR, MNGEO and Great River Energy

Aerial Imagery form:  
ESRI World Imagery  
Basemap service

Map Projection:  
UTM, NAD83, Zone15, Meters



Menahga Area  
115 kV Project  
Map 2 of 2

## NWI Wetlands and Hydrologic Features

