

Minnesota Department of Natural Resources

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



November 2, 2015

Cezar Panait, Energy Facilities Planner
Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and a Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota

PUC Docket Number: ET-2, E-015/TL-14-797
OAH Docket Number: 5-2500-32715
DNR ERDB Number: 20150073

Dear Mr. Panait:

The Minnesota Department of Natural Resources (DNR) has reviewed the application and Environmental Assessment (EA) for the Menahga Transmission Line Project in Hubbard, Wadena, and Becker Counties.

Routing

The EA states that the Blueberry route alternative, west of the city of Menahga, utilizes less existing right-of-way and impacts more acres of trees and forested wetlands than the proposed route. The DNR generally encourages co-location to reduce fragmentation of forested habitat. Therefore, the Preferred Route, west of Menahga, would appear to result in fewer impacts to natural resources.

The Proposed Route or 119th Ave. Route Alternatives appear to have the least environmental impacts in comparison to the East of 109th Ave. Route, U.S. 71 Route, and Pipeline South Route Alternatives.

Suggested Conditions

The DNR recommends the use of bird diverters at public water crossings. The bird diverters should extend beyond the boundary of the public water for a minimum of 50 feet or as warranted when considering site specific features. The DNR also supports the United States Fish and Wildlife Service recommendation of bird diverters near the Red Eye Wildlife Management Area. In addition to document plans to mitigate for bird impacts, it is recommended that the Public Utilities Commission (PUC) permit include a condition requiring an Avian Mitigation Plan. The DNR would appreciate the opportunity to review the plan and provide comments.

Due to the forested nature of the project area, it is important to reduce habitat fragmentation resulting from right-of-way (ROW) clearing as much as possible. The DNR recommends requiring border zone/wire zone ROW management. The wire zone/border zone concept allows

for different types and heights of vegetation in the ROW. The concept differentiates between the wire zone directly under the conductors and the remaining border zone within the ROW and generally allows for different, yet compatible, vegetation types in these separate zones. Types and heights of site vegetation and topography should be discussed as part of this analysis.

Wire Zone: Area directly underneath the conductors, including potential conductor sway. Vegetation in this zone consists of low-growing forbs and grasses.

Border Zone: Area that begins at the outside edge of the wire zone and extends to the edge of the easement or other right of way. This zone may contain additional low-growing woody plants and trees.

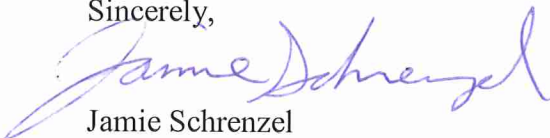
The DNR recommends that the PUC permit include a condition that natural vegetation be maintained and spraying prohibited within a minimum of a 50' buffer on both banks at all stream crossings (Kitten, Blueberry, Shell, and Fish Hook) in order to maintain habitat and bank stability.

Plans for vegetation management, including the ROW management approach, invasive species control and prevention measures, shoreland vegetation management, and herbicide use should be discussed in a permit required Vegetation Management Plan. The plan should include special considerations for sensitive areas such as wetland areas or those areas which may require other considerations such as public waters or recreational lands. The use of wildlife-friendly erosion control is recommended for any areas that may be disturbed by construction or maintenance activities that require erosion control materials be used. The DNR would appreciate the opportunity to comment on a draft Vegetation Management Plan.

Impacts to wetlands may be reduced with pole placement and route alignment shifts. The DNR recommends that project plans describe how wetland impacts will be reduced with pole placement and alignment within the route. In addition, it is recommended that construction within wetland areas occur during winter months when the ground is frozen.

Thank you for the opportunity to provide comments regarding the Menahga Transmission Line Project. Please contact me with any questions.

Sincerely,



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cc: Administrative Law Judge James Mortenson, Office of Administrative Hearings
Ray Kirsch, Department of Commerce
Michelle Lommel, Great River Energy