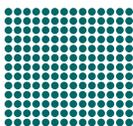


# Final Environmental Impact Statement



Fargo to St. Cloud 345 kV Transmission Line  
PUC Docket No. E002, ET2/TL-09-1056

January 2011



# Fargo to St Cloud 345 kV Transmission Line

## Final Environmental Impact Statement

January 7, 2011

PUC Docket No. E002, ET2/TL-09-1056



## RESPONSIBLE GOVERNMENT UNIT

Department of Commerce Office of Energy Security 85 7 <sup>th</sup> Place East, Suite 500 St. Paul, MN 55101-2198	David Birkholz, State Permit Manager Energy Facility Permitting (651) 296-2878 <a href="mailto:david.birkholz@state.mn.us">david.birkholz@state.mn.us</a>
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## PROJECT OWNERS

CapX 2020 Great River Energy 12300 Elm Creek Boulevard Maple Grove, MN 55369-4718	Dan Leshner (888)-473-2279 <a href="mailto:dlesher@GREnergy.com">dlesher@GREnergy.com</a>
CapX 2020 Xcel Energy P.O. Box 9437 Minneapolis, MN 55440-9437	Darrin Lahr (763) 493-1808 <a href="mailto:darrin.lahr@xcelenergy.com">darrin.lahr@xcelenergy.com</a>

Pursuant to the provisions of Minnesota Statutes, Chapter 216E, Great River Energy and Xcel Energy (the applicants) filed a route permit application with the Minnesota Public Utilities Commission (the commission) on October 1, 2009, for a permit to construct approximately 169 to 180 miles of 345 kilovolt (kV) transmission line from the Red River along the Minnesota and North Dakota border (between Clay and Wilkin counties) to St. Cloud. The Project is designed to increase generation outlet capability, improve regional and enhance local community reliability. Construction of the project is scheduled to begin in 2012 and construction is expected to be completed in 2015.

The Minnesota Office of Energy Security (OES) issued the draft environmental impact statement (DEIS) for the project on September 6, 2010. As required by Minnesota Rule 7850.2500, subp. 9, OES prepared this final environmental impact statement (FEIS). This FEIS responds to timely substantive comments received on the DEIS consistent with the Scoping Decision Document. The FEIS also contains corrections/revisions to the DEIS. The DEIS and FEIS serve as the complete EIS for the proposed project. Copies of the route permit application, the DEIS, the FEIS and other documents relevant to this project are available at the following websites:

<http://energyfacilities.puc.state.mn.us/Docket.html?Id=25053> and  
<https://www.edockets.state.mn.us/EFiling/search.jsp> (“09” year and “1056” number).



**Fargo-St Cloud 345 kV Transmission Line Project**

**Final Environmental Impact Statement**

**PUC Docket No. E002, ET2/TL-09-1056**

**January 7, 2011**



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## 1.0 INTRODUCTION

The Minnesota Department of Commerce, Office of Energy Security (OES) has prepared an Environmental Impact Statement (EIS) to evaluate the proposed project in accordance with Minnesota Rules 7850.1000 to 7850.5600 (full permitting process).

The purpose of the EIS is to:

- Evaluate the potential environmental effects of the proposed project;
- Consider alternative routes and alignments;
- Explore mitigation measures for reducing adverse impacts;
- Provide information to the public and project decision makers; and
- To aid in making permit decisions.

The EIS provides information to the public and decision makers, but does not identify the agency's preferred alternative nor does it approve or disapprove a project.

As described in more detail in Section 1.3 below, the OES released the Draft EIS (DEIS) for this project on September 6, 2010. Under the applicable rules, OES must respond to the timely substantive comments received on the DEIS consistent with the scoping decision and prepare the Final EIS (FEIS). In accordance with Minnesota Rules Chapter 7850.2500, subp.9 the Office of Energy Security Director may attach to the DEIS the comments received and its response to comments without preparing a separate document.

### 1.1 PROJECT OVERVIEW

Xcel Energy and Great River Energy (Applicants) propose to construct and operate a 345 kilovolt (kV) transmission line that is proposed to be approximately 169 to 180 miles long. The transmission line would begin at the Red River along the Minnesota and North Dakota border and terminate at the new Quarry Substation (the Quarry Substation is included in the Monticello to St Cloud transmission line route permit issued on July 12, 2010). Construction of the transmission line is proposed to begin in 2012 and be completed in 2015.

The proposed structures would primarily include single-pole, double circuit capable, self-weathering or galvanized steel structures that would range in height between 130 and 175 feet. The span length between structures would typically range in length between 600 and 1,000 feet depending on site-specific considerations. Although the proposed line would be built using double circuit capable poles, only one circuit would be installed for this Project. The second position would be available for a future additional circuit. The ROW for the proposed 345 kV electrical transmission line would generally be 150 feet in width. The applicants propose using single structure steel poles, which would require a 150-foot right-of-way for the majority of the route. There may be some situations (e.g. river crossings and existing transmission rights-of-way) along the route where specialty structures (H-frames or triple circuit structures) would be necessary. A right-of-way up to 180 feet in width would be required in these instances.

## 1.2 PROJECT PURPOSE

According to the Applicants, the purpose of the Project is to address three needs: local community reliability; regional reliability and generation outlet support. The demand for electric power in the St. Cloud area has exceeded the capability of the area's electrical system to reliably provide power during contingencies. The Project would provide sufficient additional capacity to meet the St. Cloud area's needs until approximately 2035 to 2040. The proposed 345 kV transmission line would also help improve the reliability of the bulk electric system serving Minnesota and portions of neighboring states. Finally, the Project provides a necessary 345 kV connection to the Twin Cities that would help facilitate additional generation development, including renewable generation, in eastern North Dakota and western Minnesota.

The Minnesota Public Utilities (Commission) issued the Certificate of Need for three of the four CapX 2020 transmission line projects, including this one, on May 22, 2009. See <http://www.puc.state.mn.us/PUC/energyfacilities/certificate-of-need/011260>.

## 1.3 REVIEW PROCESS AND PROCEDURES

In Minnesota, no person may construct a high-voltage transmission line without a route permit from the Minnesota Public Utilities Commission. A high-voltage transmission line is defined as a conductor of electric energy designed for and capable of operation at a voltage of 100 kV or more and is greater than 1,500 feet in length (Minn. Stat. 216E.01, subd. 4).

Route permit applications must provide specific information about the proposed project including, but not limited to, applicant information, route description, environmental impacts, alternatives, and mitigation measures (Minn. R. 7850.1900). The Commission may accept an application as complete, reject an application and require additional information be submitted, or accept an application as complete upon filing of supplemental information (Minn. R. 7850.2000). A Route Permit Application was submitted to the Commission by the applicants on October 1, 2009.

The permit review process begins with the determination by the Commission that the application is complete. The Commission has one year to reach a final decision on the route permit application from the date the application is determined to be complete. The Commission may extend this limit for up to three months for just cause or upon agreement of the applicant (Minn. R. 7850.2700). The application was accepted as complete by the Commission on November 13, 2009.

Route permit applications for high voltage transmission lines are subject to environmental review in accordance with Minnesota Rules 7850.1000 to 7850.5600. OES staff collected comments for the scope of the EIS by convening an advisory task force, holding public scoping meetings throughout the proposed project area, and accepting written comments through February 12, 2010. The EIS Scoping Decision Document was issued on April 15, 2010. An amendment to the Scoping Decision was issued on July 15, 2010, to address issues of concern to the Applicant arising since the original issuance.

On September 6, 2010, OES staff released the DEIS. The OES then held public meetings to discuss and obtain comments at the following locations:

- Barnesville American Legion, Monday, September 27, at 1:00 p.m.
- Bigwood Event Center, Fergus Falls, Monday, September 27, at 7:00 p.m.
- Dream Weaver's Banquet Facility, Elbow Lake, Tuesday, September 28, at 1:00 p.m.
- Broadway Ballroom, Alexandria, Tuesday, September 28, at 7:00 p.m.
- Rondezvous Grille, Melrose, Wednesday, September 29 at 1:00 p.m.
- Paul's Par-A-Dice, Albany, Wednesday, September 29 at 7:00 p.m.
- El Paso Sports Bar and Grill, St. Joseph, Thursday, September 30 at 1:00 p.m. and 7:00 p.m.

Comments received during the DEIS public information meetings and during the DEIS comment period (September 6 to October 18, 2010) were reviewed and responded to and are included in the FEIS.

Public and Evidentiary hearings were held at 12 locations along project area on November 16, 17, 18, and 30, 2010, and December 1 and 2, 2010. The meetings were held from 12:30-3:30 pm and 6:30-9:30 pm at each location. In addition, evidentiary hearings were held on December 6-15, 2010, at the Commission hearing room in St. Paul, Minnesota. All of the public hearings and evidentiary hearings were presided over by an administrative law judge (ALJ). The hearings provided members of the public an opportunity to speak at the hearings, present evidence, ask questions, and submit comments to the ALJ. The ALJ will submit a report to the Commission containing findings of fact, conclusions, and a recommendation on a route permit for the proposed transmission line. The Commission will then make a determination on which route to permit and what conditions to include in the route permit.

### **1.3.1 Final EIS**

The Minnesota Public Utilities Commission must decide if the EIS has adequately addressed the issues presented in the Scoping Decision Document.

The FEIS is determined adequate if it:

- addresses the issues and alternatives raised in scoping to a reasonable extent considering the availability of information and the time limitations for considering the permit application;
- provides responses to the timely substantive comments received during the DEIS review process; and
- was prepared in compliance with the procedures in Minnesota Rules 7850.1000 to 7850.5600.

The FEIS responds to timely substantive comments received on the DEIS consistent with the Scoping Decision Document. The FEIS also contains corrections/revisions to the DEIS. The DEIS and FEIS serve as the complete EIS for the proposed project.

The FEIS is organized into the following sections and appendices:

- Section 1.0: Introduction
- Section 2.0: Response to Comments - Comments Received during the Public Comment Period
- Section 3.0: Revisions and Additions to DEIS Text
- Appendix A: Public and Agency Comments
- Appendix B: Applicants Letter
- Appendix C: Revised Detailed Route Maps
- Appendix D: Fact Sheet on Blanding's Turtle

#### **1.4 COMMENT METHODOLOGY**

A total of 150 respondents commented on the DEIS during the comment period. OES staff considered and responded to comments to the extent practicable. OES staff extracted for response 540 separate comments from letters and verbal comments from the public meetings and assigned each a comment ID number. The response to comments also includes the comment source. These responses are detailed in Section 2.0 below. Unless otherwise noted, extracted comments are verbatim.

Based on the comments received, OES also modified text, tables and figures of the DEIS where appropriate. All revisions or additions to the DEIS are described further in Section 3.0 below.

##### **1.4.1 Appendix A: Public and Agency Comments**

A complete record of all oral comments provided during the public comment meetings and copies of all written comments are included in Appendix A.

##### **1.4.2 Appendix B: Applicants Letter**

Appendix B contains the Applicants' comment letter.

##### **1.4.3 Appendix C: Revised Route Maps**

Appendix C contains revised figures which identify missing information brought up during the comment period. The Applicants also requested that OES analyze a new route segment. Route Option 13 has been added to the figures.

##### **1.4.4 Appendix D:**

##### **1.4.5 Fact Sheet on Blanding's Turtle**

The Minnesota Department of Natural Resources (MnDNR) commented that the Blanding's Turtle, a state threatened species, may be present in the project area. The MnDNR provided a fact sheet regarding Blanding's Turtle appearance, habitat, and potential construction methods to avoid impacts to the species. This fact sheet is included in Appendix E.

## **1.5 PUBLIC HEARING COMMENTS**

In addition to the formal sections, the FEIS recognizes two issues that originated in or were expanded upon in the Public Hearing. The transcripts from and testimony and evidence entered into the hearing expand upon these topics; they are discussed in brief here to alert the reader to their inclusion in the record.

### **1.5.1 Iverson Lake Rest Area**

The Iverson Lake Rest Area is along I-94 just south of Fergus Falls. The Applicants' Preferred Route deviates from the highway at that point to run along CSAH 82 to the northeast, thereby avoiding the rest area, the Mn/DOT scenic easement and local wildlife management areas. However, the rest area has been closed for several months due to local flooding. Mn/DOT is uncertain at this time whether or the area will be viable in the future for its current use. If the area is unable to be used for a rest area, Mn/DOT may consider relinquishing its scenic easement. In that case, the transmission line could possibly be aligned along the southwest side of I-94 through the rest area. (See DEIS Appendix H, Sheet 14.)

### **1.5.2 Sauk Centre Airport**

The Sauk Centre Airport is located south of the city of Sauk Centre across I-94. The Applicants' Preferred Route deviates from the highway at that point to run north of the highway along 12<sup>th</sup> Street/CR 186. This alignment was selected to avoid the safety fly zone established by FAA regulations. The Applicants and city officials have been discussing potential plans for relocating the air strip. The Applicants have also been investigating design possibilities including using H-frame poles with shorter spans. The desire is to move the transmission alignment back to the highway if possible. Actual feasibility of these adaptations is dependent on meeting FAA and Mn/DOT safety regulations for public airports and the timeframe within which to make adjustments to the existing airstrip. (See DEIS Appendix H, Sheet 51).

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## **2.0 COMMENTS AND RESPONSES**

All comments received by the OES on the Fargo to St. Cloud 345 kV HVTL DEIS were reviewed, and a response was developed for all substantive comments.

This section provides:

- An index which lists the individual commenter by last name and the comment number assigned to each comment submitted.
- A comment report which provides the comment number, the source of the comment the commentors name, a summary of the comment and a comment response. Please see Appendix A for copies of the original comment letter, e-mail, or record from the public comment meetings.

The comment report has been organized by comments received during the public comment period. These comments include transcripts of public meetings; and letters, comment forms, and e-mails submitted to the OES. Appendix A includes the actual comments submitted during the public comment period. The comments have been assigned numbers which appear in the box next to the comment on the transcripts and at the top of the page of each letter, comment form, or email.

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**COMMENT #1      COMMENT SOURCE:      TRANSCRIPT****Name: Unidentified****Comment:**

When you cross that DC line, are you going to go over it or under it? The DC line drops right through your preferred route. You're going to have to cross it somewhere, aren't you?

**Response:**

If the route is selected that crosses the DC line, the Applicant would evaluate crossing options during the design phase of the project, which would include looking at the relative heights of the existing DC line and the proposed AC line.

**COMMENT #2      COMMENT SOURCE:      TRANSCRIPT****Name: Butenhoff, Dennis****Comment:**

My question is, on your far south line going by Breckenridge, why you can't share existing right-of-way with the current big transmission line that runs straight east and west?

**Response:**

There is an existing Otter Tail 230kv line heading east out of Breckenridge, MN. This option was evaluated in the permit application process and determined to be insufficient for the purposes of this project due to the need for an additional 150 of right of way, which would create an excessively wide corridor and greater overall impact.

**COMMENT #3      COMMENT SOURCE:      TRANSCRIPT****Name: Lesmeister, Dean****Comment:**

By putting it through this 140th Avenue corridor in blue here, I'm an aerial applicator, and by putting it there you're going to affect everybody in the 20-mile area. Where if you guys put a line on either side of my air strip, it's going to shut my business down. As far as resale, it's absolutely going to ruin the resale of my business. I spray for a lot of these farmers that are sitting here.

**Response:**

Option 13 in the FEIS was added to avoid the Lesmeister Flying Service.

**COMMENT #4      COMMENT SOURCE:      TRANSCRIPT****Name: Boe, Robert****Comment:**

The reason I'm here -- And I'm down by Rothsay, two miles this side of Rothsay. And if the line goes on the west side of the road there you aren't going to be very far from my house. And there

will be at least four other farms on the same side that will be affected. If you just jump on the other side of the highway there, then you're okay.

**Response:**

Once the route is approved the project will go through a phase of final design and property acquisition if applicable. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of route.

**COMMENT #5      COMMENT SOURCE:      TRANSCRIPT**

**Name: Boe, Robert**

**Comment:**

Is that any problem to jumping across the road for ten miles and jumping back again?

**Response:**

Transmission lines can and do cross roads. For right-angle turns in the line, corner structures would be needed.

**COMMENT #6      COMMENT SOURCE:      TRANSCRIPT**

**Name: Boe, Robert**

**Comment:**

You're talking a bunch of my trees too; I won't have any trees between my house and freeway.

**Response:**

The final alignment has not been selected at this time. Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Visual screening with vegetation could be considered in the foreground, but due to the height of the structure, the transmission lines may still be visible in the background.

**COMMENT #7      COMMENT SOURCE:      TRANSCRIPT**

**Name: Valan, Matt**

**Comment:**

My apologies if this question has been answered. But the environmental impact, does that include -- I assume that includes impact on human beings as well? Children walking under that, say, to the bus every day for 12 years, does that have an impact on their health potentially? Like I've read that dairy cows have had an impact for delivering milk and things like that.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #8      COMMENT SOURCE:      TRANSCRIPT**

**Name: Valan, Matt**

**Comment:**

My only point is that I live near the big honking one, and I have a disturbing amount of my neighbors that have died early of cancer, that in the old days of cultivating for a mile and a half, just basically camped under that thing at least eight hours a day. And I don't understand, and maybe those of you that have electricity, understand electricity, I mean, when I drive under that thing and I can't get transmission on a cell phone or a radio, I just wonder what that's doing to me.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #9      COMMENT SOURCE:      TRANSCRIPT**

**Name: Valan, Matt**

**Comment:**

So in my particular situation, where I live along County Road 8 on the green preferred route, my concern would be all of the children along that route, and then in a particular instance it looks as though it'll be very close to Hoff Lutheran Church, and that it impacts, in my estimation, Sunday school. And, I mean, I would be concerned any time that busses are going to and fro, the kids waiting for buses underneath the line, and that it would be impacting a Sunday school, whether it's at Hoff Lutheran or in Albany. That's why I'm here.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #10      COMMENT SOURCE:      TRANSCRIPT**

**Name: Thingvold, David**

**Comment:**

If there's just one-billionth of a chance percent that it might have some impact on my wife and kids, I won't live there.

**Response:**

Comment noted.

**COMMENT #11      COMMENT SOURCE:      TRANSCRIPT**

**Name: Thingvold, David**

**Comment:**

How close can it be to a home? Cause I'm within that 1,000 feet of the road edge.

**Response:**

Details of final pole placement will be negotiated with property owners during the right-of-way (right-of-way) acquisition process that will occur following approval of a route. The typical right-of-way for the 345 kV transmission line would be 150 feet. Homes are not permitted within the 150 right-of-way, or within 75 feet of the centerline.

**COMMENT #12    COMMENT SOURCE:    TRANSCRIPT**

**Name: Thingvold, David**

**Comment:**

I don't want any farmer to have to go around an extra pole either, so my concern is, you know, how close can it be to a home before you guys get worried?

**Response:**

See Response: to comment 11.

**COMMENT #13    COMMENT SOURCE:    TRANSCRIPT**

**Name: Boe, Robert**

**Comment:**

You're saying it's okay to be 75 feet; your house can be 75 feet from the line, that's what you're saying?

**Response:**

The transmission line right of way is based on national safety codes; the Applicant has established a policy that there will be at least 75 feet between the transmission line centerline and residential buildings.

**COMMENT #14    COMMENT SOURCE:    TRANSCRIPT**

**Name: Hovland, Robert**

**Comment:**

Anyhow, I have an irrigation system that runs right past it and it has a corner machine on it which is guided by a radio signal that comes from a wire in the ground. Well, last spring, all of a sudden when the farm machine got up next to the power line, it went right out into the field, it no longer stayed on track.

**Response:**

Geographic positioning systems (GPS) can experience interference from transmission lines; manual or other non-wireless control methods may be necessary for irrigation systems in certain circumstances.

**COMMENT #15      COMMENT SOURCE:      TRANSCRIPT****Name: Thompson, Richard****Comment:**

I'd like to do a little follow-up on the Lesmeister flying air strip there. Dean just lives a couple of miles from my place. He sprays all my crops. He flies for all the farmers out there that need something done by air. And over the last ten years, I mean, we're in a wet cycle, we need him. It would be very devastating to the farmers in our area if you shut him down. I want to make that clear.

**Response:**

The final alignment has not been selected at this time. Option 13 in the FEIS was added to avoid the Lesmeister Flying Service.

**COMMENT #16      COMMENT SOURCE:      TRANSCRIPT****Name: Butenhoff, Dennis****Comment:**

How do you know when this diversion might not even get built? There might not be funding with the next political people who get involved. So then what will you do?

**Response:**

It is unknown at this time when or if the flood diversion project in the Fargo/Moorhead area will be built. The amended scope options 1 and 2 were added to the DEIS to provide the environmental information in these areas to address the potential impacts if the diversion project moves forward.

**COMMENT #17      COMMENT SOURCE:      TRANSCRIPT****Name: Thingvold, David****Comment:**

Is that south, farther south option being weighed very heavily now, or are they leaning stronger to the north option? I mean like Wahpeton versus this one? So that one is still on the table so to speak?

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of all route alternatives, all are considered equal for comparative analysis.

**COMMENT #18      COMMENT SOURCE:      TRANSCRIPT****Name: Thingvold, David****Comment:**

Again, like I said, I know it's going to happen, I'm not against it happening, I'm just not a fan of it. Like I said, when I bought my farm I didn't want to hear those things crackling over my house, you know, on a nice calm night, you know and they do. And I don't want it over anybody else's house either, or over an air strip.

**Response:**

Comment noted.

**COMMENT #19      COMMENT SOURCE:      TRANSCRIPT****Name: Thompson, Richard****Comment:**

Explain to me why you can't put it underground?

**Response:**

Underground construction of transmission lines is an option in certain circumstances. A discussion on undergrounding is presented in Section 4.5 of the Draft EIS.

**COMMENT #20      COMMENT SOURCE:      TRANSCRIPT****Name: Thingvold, David****Comment:**

I'm assuming, then, if a landowner, you know, wouldn't agree to any kind of terms, then you'd go on the condemnation process?

**Response:**

The land acquisition process is described in Section 1.5.1. The permit applicant negotiates with the property owner(s) to determine the amount of compensation for the rights to build, operate, and maintain the transmission facilities within the easement on the property. If a negotiated settlement cannot be reached, the landowner may choose to have an independent third party determine the value of the land acquisition. Such valuation is made through the utility's exercise of the right of eminent domain pursuant to Minn. Stat. 117. The process of exercising the right of eminent domain is called condemnation. To start the condemnation process, a utility files a petition in the district court where the property is located and serves that petition on all owners of the property. If the court approves the petition, the court then appoints a three-person condemnation commission. The three people appointed must be knowledgeable of applicable real estate issues. Once appointed, the commissioners schedule a viewing of the property over and across which the transmission line easement is to be located. Next, the commission schedules a valuation hearing where the utility and landowners can testify as to the fair market

value of the easement or fee. The commission then makes an award as to the value of the property acquired and files it with the court. Each party has 40 days from the award filing to appeal to the district court for a jury trial. In the event of an appeal, the jury hears land value evidence and renders a verdict. At any point in this process, the case can be dismissed if the parties reach a settlement. If the property owner is not satisfied with the settlement with the utility or does not want to go through condemnation Minnesota Statute 216E.12 subp 4. provides a legal framework for the utility to purchase contiguous property. This is commonly referred to as the “buy the farm” option.

**COMMENT #21      COMMENT SOURCE:      TRANSCRIPT**

**Name: Valan, Matt**

**Comment:**

What's the closest that it can be that this line can be from the centerline from a particular road? I was trying to get it in my head as to what this would look like.

**Response:**

The set back from a road would depend on the type of road. If the transmission line ROW is paralleling the interstate the ROW would be located outside the fence line, with the centerline of the transmission line being approximately 25 feet from the edge of the interstate ROW. For other roads such as County or township roads it would be less than the interstate setbacks and the centerline could be approximately 5 feet from the edge of the roadway ROW.

**COMMENT #22      COMMENT SOURCE:      TRANSCRIPT**

**Name: Thingvold, David**

**Comment:**

So this would go outside the fence line on the interstate? Why can't it go inside? There's so much land there.

**Response:**

In order to occupy roadway ROW, the applicants would need to acquire necessary approvals from the owner or the agency (e.g., Mn/DOT). Mn/DOT's Utility Accommodation Policy outlines the policies and procedures governing use and collocation of state trunk highway ROWs by utilities. The policy was developed in accordance with the requirements of state and federal law (Code of Federal Regulations, Title 23, Part 645, Subpart B). It is designed to ensure that the placement of utilities does not interfere with the flow of traffic and the safe operation of vehicles.

**COMMENT #23      COMMENT SOURCE:      TRANSCRIPT**

**Name: Thingvold, David**

**Comment:**

And it will never happen that it would go over this existing honking piece that already runs through most of the townships that we're concerned about? It will never go in the existing right-of-way along with it?

**Response:**

The details of a final alignment have not been developed at this time; once the route is approved the project will go through a phase of final design. The process is not considering any alignment along the existing DC line.

**COMMENT #24      COMMENT SOURCE:      TRANSCRIPT**

**Name: Holt, Janet**

**Comment:**

Is it in any of the books or anything saying that they could put another line down that?

**Response:**

The Certificate of Need process determined that the transmission line would be built double circuit capable. This project will consist of constructing one 345 kV transmission line. In the future, a second 345 kV transmission line could be constructed after undergoing a separate permit and environmental review process.

**COMMENT #25      COMMENT SOURCE:      TRANSCRIPT**

**Name: Thompson, Richard**

**Comment:**

Was every landowner and every person that owns a farmstead notified of this meeting?

**Response:**

Individuals included on the Office of Energy Security mailing list were notified of the meeting. Meeting notices are also posted on the PUC website and were published in local newspapers. In addition to the OES mailing list, the Applicant sent meeting notices to all property owners within the potential routes.

**COMMENT #26      COMMENT SOURCE:      TRANSCRIPT**

**Name: Cichosz, Jerome**

**Comment:**

What we'd really like here is to, when it comes to placing or locating this transmission line, that it be done responsibly with minimal effect to homes, potential development areas, and to the

environment. And also from the EMI effects for people that must live near this thing or around it.

**Response:**

The purpose of the EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. The final recommendation of the administrative law judge will include consideration of minimization of these effects.

**COMMENT #27      COMMENT SOURCE:      TRANSCRIPT**

**Name: Cichosz, Jerome**

**Comment:**

So we the undersigned wish to express our concerns about the routing location for the CapX power transmission line as it passes Fergus Falls. I've seen in a later map, I think that shifts it part way, almost midway into that field between our housing development, the freeway and the city. We learned the reason for this field being considered is that MnDOT has a scenic byway easement along the Otter Tail River and I-94 south of the railroad bridge. However, that easement is neither usable nor practical for use by traveling motorists because of its size, its length, and its shape. It's not very wide and its cut in half basically, by the Otter Tail River because it almost approaches the freeway from the west side. Further, it's obstructed by the railroad bridge, so it's too short for on, off ramps, insufficient width for parking and, as I said, the river nearly divides it in half. Therefore, this easement should not be used as a reason to route the transmission power line away from the Interstate 94 corridor.

**Response:**

Comment noted.

**COMMENT #28      COMMENT SOURCE:      TRANSCRIPT**

**Name: Cichosz, Jerome**

**Comment:**

Also, running a transmission line further away from I-94 in that farm field east of River Oaks and west of the city would be harmful to our housing development and any future development purposes in that area for the following reasons. It impedes the growth and development potential for either River Oaks or the City of Fergus Falls. This is a prime housing area that is close to the city of Fergus Falls and has scenic views of the Otter Tail River and valley. It would affect and lower the taxable market value of this area. Our home real estate property values would be lowered, and these families have invested in their homes in this area before any transmission line like this existed and families would suffer losses under their real estate investment.

**Response:**

Impacts to property values were considered and discussed in Sections 5.1.2, 6.1.2, and 7.1.2. The applicant will work with property owners to develop mitigation measures which are presented in Sections 5.1.3, 6.1.3 and 7.1.3 of the Draft EIS.

**COMMENT #29      COMMENT SOURCE:      TRANSCRIPT****Name: Cichosz, Jerome****Comment:**

It would destroy the pristine Otter Tail River valley between our homes and the town of Fergus Falls. It also would intrude on and damage our peaceful, relaxing, and beautiful homes sites.

**Response:**

Comment noted.

**COMMENT #30      COMMENT SOURCE:      TRANSCRIPT****Name: Cichosz, Jerome****Comment:**

We're also concerned about the electromagnetic field effects, health and otherwise, in the proximity of our house.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #31      COMMENT SOURCE:      TRANSCRIPT****Name: Cichosz, Jerome****Comment:**

It would affect the wildlife living and flying above the river valley. Large numbers of geese fly out from the city and river over this field. It's a natural flight path out west to feeding areas. Also bald eagles and trumpeter swans nest and fly the area. And a power line across that field would cut across and interrupt those flight paths.

**Response:**

As discussed in Section 6.9.3 of the DEIS, avian issues at water body crossings and other areas of concern would be addressed by working with the USFWS and MnDNR to identify any areas that may require marking the proposed transmission line, such as with the use of bird flight diverters, in an effort to reduce the likelihood of collisions. In 2002, Xcel Energy entered into a voluntary Memorandum of Understanding with the USFWS to work together to address avian issues throughout its service territories. The development of Avian Protection Plans for each state the Company serves, including Minnesota, is currently underway to help support the Memorandum of Understanding. This Memorandum of Understanding has been approved by

the USFWS. Additionally, to mitigate possible impacts on wildlife, the Applicant is proposing to avoid areas known as major flyways or migratory resting spots, and span designated high quality wildlife habitat areas to the extent feasible. In areas where complete spanning is not possible, the Applicant intends to minimize the number of structures placed in high quality wildlife habitat, and is proposing to work with the MnDNR and USFWS to determine appropriate minimization and/or mitigation measures such as adding transmission line shield wires to the lines.

**COMMENT #32      COMMENT SOURCE:      TRANSCRIPT**

**Name: Cichosz, Jerome**

**Comment:**

We therefore recommend that the transmission line be located in the optional alternate route A, which is south, and stay away from the many inhabited areas of our cities and small towns that border I-94. It might also be routed out west of the airport if the scenic byway interests prevail. At a minimum, if a line is routed along I-94, it should be located immediately adjacent to I-94 as it passes Fergus Falls.

**Response:**

Comment noted.

**COMMENT #33      COMMENT SOURCE:      TRANSCRIPT**

**Name: Cichosz, Jerome**

**Comment:**

I don't know what that EMF impact of that power line would have to wildlife flying out from the city, because that kind of goes on all winter, unless the snows get too bad. So it would impact the wildlife, I would think, which I think would be addressed in this statement.

**Response:**

The Applicant and the state have reviewed potential health impacts from the transmission line, including a request by the state to look at higher operating amperages that could occur in the future. The result of the analysis indicate that electric and magnetic fields will be less than the maximum standards established in other states and below standards in other countries.

**COMMENT #34      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

It would be really useful in the DEIS to have an overall map showing, you know, the head bone connected to the shin bone, where you've got the preferred corridors, the alternate corridors, other corridors that were added where you could just flip over the page and look at existing types of corridor, existing pipelines, existing rail lines, existing transmission lines. You know, that

would be really handy to have that on a page where you could just flip them over to see, to look at that proliferation and the impacts.

**Response:**

Refer to Appendix H of the Draft EIS for Detailed Route Maps including residential locations.

**COMMENT #35      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

And what I wanted to enter into the record are maps from the Fish and Wildlife. I know it's an issue in the Brookings case, but in this one there's a big impact on the preferred route, there's a lot of Fish and Wildlife land there, so I'm going to enter in Douglas County, Grant County, Wilkin County, and Otter Tail County has a couple of them.

**Response:**

Federally owned or managed lands that protect wildlife habitat and nesting include National Wildlife Refuges (NWRs), WPAs, and U.S. Fish and Wildlife Service (USFWS) easements. These lands are owned and managed by the USFWS to conserve important natural resources. Electronic data available was used in GIS to calculate potential impacts to USFWS managed lands are presented in the Natural Land Resources Sections 5.9, 6.9, and 7.9 of the DEIS.

**COMMENT #36      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

I don't see an evaluation of socioeconomic impacts of, for instance, MN Stat 273.42 and 425, which are adjustments of levies and property credits for transmission, and I think that that also ought to be in there somewhere.

**Response:**

The analysis of adjustments to levies and property tax credits pursuant to Mn Stat. 273.42 is beyond the scope of this EIS. This statute and the processes associated with it are handled by the county auditor.

**COMMENT #37      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

There is a notation in the EIS about induction problems related to pipelines and that it can be a corrosion issue. And now is induction also a problem with, like, say steel buildings or roofs next to transmission lines? Suppose a building is 76 feet away and its outbuilding or a shed that people work in regularly for farming, could induction be an issue with a metal building?

**Response:**

When a steel pipeline is installed close to a high-voltage AC transmission line, interference can occur between the transmission line's electromagnetic field and the pipeline, which may result in damage to the pipeline or its protective coating. Since 1971, pipeline safety regulations require cathodic protection systems for federally regulated pipelines to mitigate for such effects. Further, pipeline operators are required to monitor the effectiveness of the cathodic protection system and condition of protective coatings and make repairs as necessary. Induction is not an issue with metal buildings located outside of the right of way.

**COMMENT #38      COMMENT SOURCE:      TRANSCRIPT****Name: Overland, Carol****Comment:**

I'm really concerned about EMF. And this is something I really hope you will dig into. Because what I see here on page -- it's 5-24. Now, are you familiar with the St. Cloud to Monticello compliance filing that was made like a week or two ago or three that talked about -- it was a compliance filing where they disclosed the potential capacity of the line. And if you --well, as I read it, it said that it could go, when the Fargo line is connected, up to 1,800 MVA, which is consistent, it's a little bit lower than that that has been talked about thus far in the certificate of need; it was 2,050 MVA per circuit, which would be 3,304 amps. Now, I don't see any discussion in here about 1,800 as a potential loading for MVA and what the associated amps are. That needs to be in here.

**Response:**

See section 3.4.3 of this FEIS for a discussion about the anticipated magnetic fields associated with the greater amperages expected in contingency situations.

**COMMENT #39      COMMENT SOURCE:      TRANSCRIPT****Name: Overland, Carol****Comment:**

They need to be alert. If you have 2,050 MVA and 3,394 amps associated with 2,050, so if you have 1,800 MVA, how many amps are associated with that? I'm a math idiot, but it's like well over 2,000 and it's approaching 3,000. So you take a look at this chart here, r5-24, and we've talked about this before, and we've got it in that compliance filing that you should know that 158 and 264 amps is like ten times too low. And if that's ten times too low, does that mean that somebody sitting here at zero, with 31.89 milligauss it's going to be 331, if it's ten times too low you're sitting there at the right-of-way edge, which is 8.7 in this chart, if it's off by a factor of ten you're talking 87 milligauss. And NAIHS and everybody, they found associations where it's been like four milligauss and sometimes down to two. So this chart is off by probably a factor of ten, if not more. And I spoke about this at the Brookings' EIS, also at the Hiawatha hearing, and this needs be taken seriously. You've got the documentation in the 09-246 docket, and that's the St.

Cloud to Monticello, and they have stated what the capacity is expected to be, what it could be, and so there should be a range of EMF figures here for a range and not this 264 and 158. There's no excuse for that. These are one-tenth of what they should be, or more. I mean less. It's a very large error. Significant. So I want to see that corrected.

**Response:**

See response to comment 38.

**COMMENT #40      COMMENT SOURCE:      TRANSCRIPT**

**Name: Hansel-Welch, Nicole**

**Comment:**

My question is I notice down by St. Cloud you included a lot of different route options in the EIS. How is it determined what options -- or how many routes were considered and why not more -- why weren't more considered out in the more rural areas?

**Response:**

OES convened an Advisory Task Force (ATF) to help develop route options in the Sauk Centre to St. Cloud area. The OES through the scoping process made the determination to carry forward all of the routes developed by the ATF. There was no ATF requested or convened in other segments of the line.

**COMMENT #41      COMMENT SOURCE:      TRANSCRIPT**

**Name: Haagenson, Lynn**

**Comment:**

We can't get a loan because we can't tell them for sure which side the power line is going to go on. Here's a perfect example of a small business trying to start, create jobs, and being stymied by bureaucracy. I just want to be sure that you know that it's been zoned commercial. And if you want to come across there, you're going to pay big time for it, especially if we do get financing and there's a half constructed building there.

**Response:**

Comment noted.

**COMMENT #42      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

The socioeconomic impacts of just notice of the line. It isn't just actually having a line across your property that creates a problem; notice of it is a problem. If you're trying to sell your property, you have to disclose that. What is the impact of that? No one is going to buy your property; no one is going to finance it. If you have an FHA loan you can't get financing for

something that's in the fall zone of a transmission line. So there are impacts and these kinds of things that need to be addressed also in the EIS.

**Response:**

Property values are discussed in Sections 5.1,6.1 and 7.1 of the DEIS. A review of studies on the subject conducted over a 25-year period indicates that when a negative effect to property values occurs, it is generally limited in distance and is temporary. Specific effects to individual properties will be determined during the right of way and easement acquisition phases of the project.

**COMMENT #43      COMMENT SOURCE:      TRANSCRIPT**

**Name: McCoy, Keith**

**Comment:**

The reason why I didn't want the power line coming down our driveway, I made those comments and my attorney had some paperwork here that I submitted in January, has any of that been addressed in these books and any decision been made, or is all of this for naught, I got to wait for a judge or something?

**Response:**

The EIS scoping comments have been filed and were taken into consideration in the development of the DEIS. The Draft and FEIS will be considered by the Administrative Law Judge in the development of a recommendation for a route.

**COMMENT #44      COMMENT SOURCE:      TRANSCRIPT**

**Name: McCoy, Keith**

**Comment:**

Section 13 in Moe Township, Douglas County. And the other thing is, where you're going there, it comes right up to the lake. In fact you've got the north bay of Lobster Lake there. There's float planes and stuff that fly in and out of there. I don't see any reason, if you have to come way the heck down in there, you could follow the township road, which is halfway between the interstate and where you're going to save yourselves some money. So, I mean, the lake is real narrow there and any float planes that come in and off of there, it's like a southwest to northeast narrow lake and they fly right over the house there and land on the lake. So if you've got these 150-foot towers right at the edge of the lake I think that's a detriment to anybody on a float plane trying to get on the lake. And I don't think you'd build them next to an airport, would you?

**Response:**

There is not a FAA registered airport on Lobster Lake. When the final alignment is selected, the applicant could work with individual property owners while negotiating the easement agreement if an accommodation is possible.

**COMMENT #45      COMMENT SOURCE:      TRANSCRIPT****Name: McCoy, Keith****Comment:**

I got one other thing about the developments. There's a developer that, prior to this ever coming up, has preliminary plats in this area that you've greened out for like 156 homes. So are you aware of that or should I bring that to the meeting, say, when you're down in Alexandria or something, this preliminary plat that he's got for this whole development? You come right through the center of that over houses, like 150 some houses. Do you consider preliminary plats?

**Response:**

Existing land uses and structures were considered in the impact analysis. Future land use plans from study area governments were reviewed to determine the potential for future land use. Individual developers were not consulted.

**COMMENT #46      COMMENT SOURCE:      TRANSCRIPT****Name: Gerlach, Sylvester****Comment:**

I'd asked why they had that alternate route from Breckenridge. And it's just if you look on a map it zig zags, zig zags, zig zags, and they were saying the cost of every time there was a corner or junction was so great, and that's why it was hard for me to figure out why in the world they'd take this instead of the other. And then somebody stood up and said DNR and Fish and Wildlife don't want them going across any of theirs. Well, I can see that no matter where the line is going to be, there is going to be Fish and Wildlife somewhere or another. And maybe in -- I don't know when it would ever happen, but in years to come every design will be underground lines, then it wouldn't hurt anything. But I don't know what's going to happen.

**Response:**

Comment noted.

**COMMENT #47      COMMENT SOURCE:      TRANSCRIPT****Name: Overland, Carol****Comment:**

The other issue again is the EMF chart -- I'm going to bring this up in every meeting -- on 5-24, that's the section of the EIS, DEIS. The EMF, I don't know, modeling, is way off, and it looks to me like it's about ten times off. There will be more information on this at NoCapX2020.info, I have some information on it now, but I'll have more posted shortly. But the estimates are way way off and the impacts of EMF will be much, much higher than what's shown.

**Response:**

See response to comment 38.

**COMMENT #48      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

I noticed coming up here that on the north side of 94 there's an air strip between 85 and 86, and I think that would be like sheet 16 or 17, but I can't find it anywhere in these listed as a private air strip. I'm not sure if it's FFA or not, but there is a private strip there.

**Response:**

There is not a FAA registered airport in the area. When the final alignment is selected the applicant could work with individual property owner while negotiating the easement agreement.

**COMMENT #49      COMMENT SOURCE:      TRANSCRIPT**

**Name: Henneman, Robert**

**Comment:**

Douglas County, Evansville Township. That's on the preferred route, and which brings me to me putting in a proposal of alternate route 2-B. And I see it's on there and that was one of the issues we have. And I was reading on the Internet that there's no residences within 75 feet of the poles. I am wondering how they come up with that number? Were they actually there and measured it? Because there's residences along that preferred route that have to be within that 75 feet and that's one of the reasons we came up with alternate route 2-B, to help mitigate those issues.

**Response:**

Option 2B was analyzed in the DEIS and is still under consideration in this process. The Applicants have requested a route width of 1000 feet in order to allow them flexibility during final design. The final ROW would generally be 150 feet. For the purposes of the Draft EIS an alignment centerline was applied (Refer to Appendix H for Detailed Route Maps) and residences were identified within 500 feet of the proposed alignment. The Applicants have stated they will not use alignments that would place residences within 75 feet of the centerline.

**COMMENT #50      COMMENT SOURCE:      TRANSCRIPT**

**Name: Henneman, Robert**

**Comment:**

What is considered your residence? You know, these are farm sites, and I guess I consider my whole farm site, grain bins and outbuildings, all part of my residence.

**Response:**

The Applicant identified both assumed residential and non-residential structures (barns, sheds, detached garages, etc.) as discrete data points to the extent possible based on field reconnaissance via publicly accessible roads and aerial imagery interpretation. For the DEIS analysis a residence is considered to be the individual's actual domicile.

**COMMENT #51    COMMENT SOURCE:    TRANSCRIPT****Name: Henneman, Robert****Comment:**

The other thing that I have forgot to include in that letter we sent, and I guess I didn't know it would be affected, but all the land in section 15 is farmed organic, and I see there's a special appendix B concerning those. And I guess that should be noted on the preferred route, and taking the alternate route would mitigate that problem. So there's a mile on the north side of 94 that's all farmed organic and has been organic since '98, 1998. I see there's special provisions included for that.

**Response:**

Comment noted.

**COMMENT #52    COMMENT SOURCE:    TRANSCRIPT****Name: Henneman, Robert****Comment:**

Because we live by the interstate we have planted probably 400 yards long of trees between our residence and the freeway and then also going beyond where our grain bins are to keep the noise out. And as I understand from the January meetings, those trees will probably come down.

**Response:**

The permittee could work with the landowner to best avoid losses of windbreaks and other features. If those losses are unavoidable, other mitigation might include some form of alternative vegetative screening.

**COMMENT #53    COMMENT SOURCE:    TRANSCRIPT****Name: Fredericksen, Janel****Comment:**

And my question is, in looking at least the summary of the draft report, when we're comparing impact from the preferred route, route A, are we taking into consideration the impacts in North Dakota, specifically Richland County? We get up to the Wilkin County, Minnesota/North Dakota border, and the North Dakota side impacts, were they included in the draft study? My concern then would be that we're not comparing apples to apples when we compare the environmental impact of route A, the environmental impact on the preferred route, because

we're only getting we still probably have about 40 miles north to go on the North Dakota side and those impacts should be taken into consideration as well. I realize that's not the State of Minnesota's concern, however, it's an environmental impact that's going to affect both sides of the river.

**Response:**

The project limit for the scope of this EIS is the Minnesota and North Dakota border. The Minnesota Public Utilities Commission will make a decision on the final route in Minnesota. The environmental review is being conducted under the Minnesota rules for routing of high voltage transmission lines in Chapters 7850 of the Minnesota Rules, under the Minnesota Power Plant Siting Act. North Dakota will administer environmental review for the portion of the route within its border. The Applicant is coordinating with agencies in both states in the route selection and permitting process.

**COMMENT #54      COMMENT SOURCE:      TRANSCRIPT**

**Name: Fredericksen, Janel**

**Comment:**

The other concern being I didn't see any mention of the agricultural and aviation use on let's say Grant County, Wilkin County, as far as the agriculture use, crop spraying, and any potential safety impacts that that might have.

**Response:**

Aerial spraying is an important tool for agricultural operators, and the State and the Applicant understand there are concerns that transmission lines could hinder or affect crop dusters' flight paths. Aerial operators must fly at extremely low altitudes to apply their pesticides and fertilizers effectively. When a final alignment is selected the applicant could meet with crop dusters to identify options to mitigate local impacts and solicit suggestions on details of final pole placement.

**COMMENT #55      COMMENT SOURCE:      TRANSCRIPT**

**Name: Fredericksen, Janel**

**Comment:**

The other concern that I had is we have statistics regarding the 75-foot impact, that there are no homes located within 75 feet, I believe it says there are approximately 70 homes located on the routes within I believe that was 500 feet. My concern is, if we look at those two routes, when we get into let's say 250 or 200 or 300 feet from the proposed lines, how many homes are in that area in that span of space, just so we're having that valid information, within maybe 100 yards, you know, maybe 300 feet. That might be helpful information because there's certainly some residential population in Wilkin County and Richland County residences as well that would impact their farmsteads, their homes, and certainly three private air strips located immediately on the Richland County side once it crosses the Red River.

**Response:**

Calculations for residences within 0 to 75 feet, 75 to 150 feet, 150 to 300 feet, and 300 to 500 feet are presented in Sections 5.1, 6.1, and 7.1. Airports and airstrips are addressed in Sections 5.1, 6.1, and 7.1.

**COMMENT #56      COMMENT SOURCE:      TRANSCRIPT**

**Name: Loken, Peter**

**Comment:**

I'm assuming that the State of Minnesota will condemn the property under eminent domain and then pass it off to the using facility, is that the process that's going to happen.

**Response:**

See response to comment 20.

**COMMENT #57      COMMENT SOURCE:      TRANSCRIPT**

**Name: Loken, Peter**

**Comment:**

Can someone explain the size of this physical structure of the towers and then the spacing? And I realize that'll be different for different terrain, but just say on a level piece of property what would the spacing be? And then once that's all in place what happens to the easement?

**Response:**

Refer to DEIS Section 1.1 Project description for an explanation of the physical structures and spacing.

**COMMENT #58      COMMENT SOURCE:      TRANSCRIPT**

**Name: Loken, Peter**

**Comment:**

If the towers are such that farming could be conducted underneath the line, will the farmers be allowed to go back on the property after the construction is over?

**Response:**

Yes - the utility will require temporary access to the easement property for construction purposes, but will restore the area beneath the transmission line to as near pre-construction conditions as possible. Once construction is complete, farming activities can resume beneath the transmission line.

**COMMENT #59      COMMENT SOURCE:      TRANSCRIPT****Name: Overland, Carol****Comment:**

You need to know that in Minnesota we have what is called Buy the Farm. If your land is chosen for an easement you have the option of forcing the company to condemn the entire parcel and you can get out from under it. And that's 216E.12, subdivision 4. And that is something you need to know about, that this is an option. Not that anyone wants to leave their farm, but that is an option that you do have in Minnesota.

**Response:**

Comment noted.

**COMMENT #60      COMMENT SOURCE:      TRANSCRIPT****Name: Loken, Peter****Comment:**

Do these maps have the preferred route? Because I don't believe I've seen that on any of the maps I've seen.

**Response:**

The preferred route is the route that the company requested initially. And in the State of Minnesota in a large transmission line under the full permitting process, they need to come in with an alternative. So the green line from Fargo to Alexandria is the preferred route by the applicant. We have evaluated that in the EIS, we've evaluated the alternative that enters south of Breckenridge, Wahpeton. We have evaluated some options that came up in the discussions with people along the way. So all those pieces are actually open to selection, but as to the preferred, that is what the company has requested in the first place.

**COMMENT #61      COMMENT SOURCE:      TRANSCRIPT****Name: Easy, Terry****Comment:**

I'm in total agreement with this young lady here from the Breckenridge area. I don't know how you guys can do an impact study, you know, the proposed route versus the next route, which comes down across from Breckenridge, Wahpeton, when you don't have their impact study done from the North Dakota side. You can't do that. That's not right.

**Response:**

The calculations for the analysis of the preferred route in the North Dakota to Alexandria Section of the DEIS only included data from the North Dakota border to Alexandria. The project limit for the scope of this EIS is the Minnesota and North Dakota border. The Minnesota Public Utilities Commission will make a decision on the final route in Minnesota. The

environmental review is being conducted under the Minnesota rules for routing of high voltage transmission lines in Chapters 7850 of the Minnesota Rules, under the Minnesota Power Plant Siting Act. North Dakota will administer environmental review for the portion of the route within its border. The Applicant is coordinating with both states to address social, economic and environmental impacts along the route options.

**COMMENT #62      COMMENT SOURCE:      TRANSCRIPT**

**Name: McCoy, Keith**

**Comment:**

The members of the community kind of put together a sewer project here and it runs into this area that you're coming down into. And I doubt if any of this preliminary plat that Larry Sabodjo (phonetic) had here were ever available to you. Your power line would go for 103 houses and a public park and come up the driveway right to the lake and head down the drainage tile. And I'm wondering, you know, like this drainage area, it's a regular watershed, if the power line was built over that how would we maintain that? I mean, wouldn't you have the right to dig up the tile or dig a trench? The other thing is, for 700 feet you take out this big grove of trees next to my driveway.

**Response:**

The proposed transmission line would require a 150 foot ROW which would be maintained by the Applicant. Details of how drainage or utilities could be maintained would be part of the negotiation process between the landowner and the Applicant.

**COMMENT #63      COMMENT SOURCE:      TRANSCRIPT**

**Name: Wright, Elmer**

**Comment:**

So I wonder if they're going to take into consideration and do jogs like that so that they can stay off of people's property or at least be on property that's not occupied by people.

**Response:**

Once the route is approved the project will go through a phase of final design and property acquisition if applicable. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of route.

**COMMENT #64      COMMENT SOURCE:      TRANSCRIPT**

**Name: McCoy, Keith**

**Comment:**

What about the transmission line that goes over your distribution that comes to the house? The way it's planned right now its buried power towards the house for like 1,000 feet if you built that parallel right along there. Would you have to bury that power or is that interfering with it?

**Response:**

Transmission lines can be constructed over existing distribution lines without interference.

**COMMENT #65      COMMENT SOURCE:      TRANSCRIPT**

**Name: Bennett, Glen**

**Comment:**

Now, this line is being called a 345 kV line, and if in the future three more conductors are put up on these poles, which I maintain if there's a potential for it somebody is going to build a line pretty darn quick, will that become a 690 kV line or what are you going to call it then?

**Response:**

The construction that occurs during this project will include poles that will be capable of hosting double circuits. This project will consist of constructing one 345 kV transmission line. In the future, a second 345 kV transmission line could be constructed after receiving a permit application from the Utility and completing the environmental review process. This would result in two separate 345 kV transmission lines not one 690 kV transmission line.

**COMMENT #66      COMMENT SOURCE:      TRANSCRIPT**

**Name: Bennett, Glen**

**Comment:**

And another thing, you speak of easements when this line is going to be built, but what will the payment be for these easements?

**Response:**

The easement acquisition and payment will be negotiated by the permit applicant and property owners.

**COMMENT #67      COMMENT SOURCE:      TRANSCRIPT**

**Name: Esterberg, Tiffany**

**Comment:**

What would this do to the land value for those that are affected?

**Response:**

See response to comment 28.

**COMMENT #68      COMMENT SOURCE:      TRANSCRIPT****Name: Esterberg, Tiffany****Comment:**

What is the danger to animals or livestock or other animals? And then one of these gentlemen mentioned fire danger, and that's not something I ever considered before.

**Response:**

Stray voltage is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS. Stray voltage typically is associated with distribution lines and not transmission lines. The Department of Agriculture defines stray voltage as a “difference in voltage between two surfaces that may be contacted simultaneously by an animal.” This difference in voltage causes the return current to go thru objects or the ground.

A wide variety of on and off farm sources can contribute to stray voltage:

- Inadequate connections on the neutral or ground wire system
- Poor grounding conditions
- Undersized neutral conductors
- Dirty, dusty, corroded, cobwebbed or damaged electrical boxes and devices
- Defective electrical equipment

Distribution lines have induction and coupling issues under high voltage transmission lines due to the capacitive coupling of ungrounded metal objects; which cause a static charge to build up and dissipate when touched with a path to ground. The effects of stray voltage can be mitigated by bonding them to a good ground. Farm animals and wildlife are well grounded with their contact to earth; however, there could be some effects if they come into contact with a metal object. Typically in transmission line construction, mitigation includes adequate grounding if the proposed transmission line is within so many feet of a metal building, fences or other metal objects.

**COMMENT #69      COMMENT SOURCE:      TRANSCRIPT****Name: Esterberg, Tiffany****Comment:**

Is private land the only land that will be taken, used, is state land something that will also be considered?

**Response:**

The transmission line can cross private or public land; although certain categories of public land cannot be impacted, such as SNAs.

**COMMENT #70 COMMENT SOURCE: TRANSCRIPT****Name: Erickson, Wayne****Comment:**

And I don't want to sound like not in my backyard, but this is a beautiful piece of property and I'm concerned, I guess, about the aesthetics of it. It's a beautiful setting from which we can now look out and see a lake to the east, Lake Mary to the west, and if the alternate route goes in, we'll also have a beautiful view of a big power line, correct?

**Response:**

Multiple alignments are under consideration. The Option 3 route diversion from the Applicant Preferred Route travels south from Interstate 94 and turns east towards Alexandria on State Highway 27 on the north end of Lake Mary. Once a final alignment is selected the Applicant will work with residents to address potential mitigation measures as discussed in Section 5.3.3.

**COMMENT #71 COMMENT SOURCE: TRANSCRIPT****Name: Erickson, Wayne****Comment:**

We're concerned about what it does to the value of the property.

**Response:**

See response to comment 28.

**COMMENT #72 COMMENT SOURCE: TRANSCRIPT****Name: Erickson, Wayne****Comment:**

We're concerned about the safety of people living in and near a large voltage power line.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #73 COMMENT SOURCE: TRANSCRIPT****Name: Wright, Jannette****Comment:**

That right now we have a pretty pristine view out of our windows, I have five great big, huge picture windows that overlook nothing other than wilderness, and if the power line comes I'm going to be looking at a power line.

**Response:**

Comment noted.

**COMMENT #74 COMMENT SOURCE: TRANSCRIPT**

**Name: Wright, Jannette**

**Comment:**

We have about \$500,000 invested in this property. And I can about imagine what it's going to do to the property value.

**Response:**

Comment noted.

**COMMENT #75 COMMENT SOURCE: TRANSCRIPT**

**Name: Wright, Jannette**

**Comment:**

I guess my suggestion would be to probably stick to the preferred route, which does go by the freeway, and stay within that corridor, because the property there has already been compromised.

**Response:**

Comment noted.

**COMMENT #76 COMMENT SOURCE: TRANSCRIPT**

**Name: Lamely, Eileen**

**Comment:**

How close can a tower be to someone's home and how close to the lake? And are there any rules about how close you can go to the water? Or can you build on a swamp?

**Response:**

Sections 5.8, 6.8 and 7.8 of the DEIS discusses impacts to water resources. Surface waters will be spanned and wetlands would be avoided to the extent practicable.

**COMMENT #77 COMMENT SOURCE: TRANSCRIPT**

**Name: Fuchs, Virgil**

**Comment:**

And I advocate that we get monthly payments for these towers, the same as a cell phone tower. A cell phone tower will yield \$750 a month today. And why, if you're going to have use of private property for the transmission of this line, why not pay people a proper rate? You won't get any argument, you wouldn't even have to have a meeting today, you'd just put up a sign here, we're selling towers, we're going to pay proper land use for those things. And I intend to make that my intentions, to have that happen for this power line. What do you think of that idea?

**Response:**

Comment noted.

**COMMENT #78      COMMENT SOURCE:      TRANSCRIPT**

**Name: Kulzer, Marvin**

**Comment:**

They'll condemn your land and take it from you?

**Response:**

See response to comment 20.

**COMMENT #79      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

In identification of discrepancies I will start with the analysis of the Freeport to St. Cloud advisory task force report. The first error is found in the third paragraph of page 1. 14 persons, not 15, on the ATF. This may possibly be important if statistics are formulated from a universe of 15 instead of 14. Example, one-fourteenth is different than one-fifteenth. Appendix D of the ATF, page 16, will be referenced for the following errors and omissions. The top priority stated in the ATF is for design considerations. 11 out of 14 votes were cast to follow existing public use corridors and to avoid proliferation of new corridors. 11 out of 14 ATF members, which would be rounded to 79 percent. The message on preference for nonproliferation is loud and clear and supported by a very strong majority of ATF members. The word proliferation is found in one occurrence in the DEIS. It is on page number 67 in the section 1.5 on route width. This omission of vital ATF documentation on proliferation is pathetic. Proliferation avoidance is addressed in statutory requirements of Minnesota statute 216E.02. The law is specific on the requirement of using existing corridors. This extreme proliferation is 42 percent of the preferred route and 33 percent of the alternative A route. These excessive proliferation values are significantly higher than other routes. We have a right to demand that proliferation is part of the route determination and selection.

**Response:**

A table summarizing the use of existing rights of way by each of the routes has been included in the FEIS.

**COMMENT #80      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

In the analysis of underground routes we see a bait and switch strategy used. On page 1-1 the six recommended routes are identified. The route in question is the route identified as group 1,

Alternative 1, which follows the I-94 corridor, with a minor deviation to reduce impacts to St. John's University and a portion of potential undergrounding to address predominantly sensitive areas. In Table 1.4-1 titled Alternative Routes to be Analyzed in the EIS on page 1-15 the ATF group -- I'm sorry, the ATF route group 1, alternative 1 has been eliminated. It is also noted that it was clear that the identified ATF members requested consideration of a variation of the group 1, alternative 1 route for priority for undergrounding in the Avon area around rest stops and the narrow area around the Spunk Lakes. These eight ATF members are on record with their names and signatures of support. The signatures are found in the ATF detail. These eight ATF members were adamant that this option of more limited undergrounding be analyzed. The elimination of this significant route alternative is purely and simply a bait and switch tactic. This negligence and carelessness, either intentional or unintentional, is inexcusable. People affected by your high voltage lines running through their farms, their wetlands, close to their homes and buildings deserve better.

**Response:**

Route 1 Alternative 1 has not been eliminated, rather it has been renamed. See Table 1.4-1 shows that Group 1, Alternative 1 is renamed to Route D which has been carried through including undergrounding options in the DEIS. Refer to Section 7 for the Affected Environment, Potential Impacts, and Mitigation in the Sauk Centre to St. Cloud area.

**COMMENT #81      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

The cost estimates seem out of sync with a similar project such as the Hiawatha project and the details of the Mississippi River crossing.

**Response:**

The cost estimates presented in the DEIS are conceptual cost estimates based on the limited conceptual design information available at this time. Detailed costs for the transmission line require additional design details. The estimates presented in the DEIS are for comparison between routes, not other projects.

**COMMENT #82      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

In addition, there is serious lack of congruency in documents and tables on the amount of amps for the Fargo to the St. Cloud line. The amount of amps is in a direct relationship to the amount of EMFs. Of special concern is Table 6.2-5 found on page 6-23 of the DEIS. Why do the calculated magnetic fields vary from table to table? For example, consider the October 1st, 2009 application to the Minnesota PUC for a route permit for the Fargo to St. Cloud 345 kV transmission line. In this document, project figure 3-10 calculated magnetic fields peak amp of

50.2, for the same structure type found in 6.2-5 of the DEIS it is listed as 264 for peak amps. 50.2 does not equal 264. This perplexity of different values for an apple-to-apple comparison is further complicated by the certificate of need document in 06-1115, in ID -- this was a tough one to find, ID 20108-53863-01 which states once the lines are in use the amps could be as high as 600 MVA and under some conditions power levels could be as high as 1,200 to 1,500 MVA. Is this an error of exponential magnitude? The need for clarification is urgent. This appears to be yet another example of possible deliberate manipulation of data. Has the EMF risk to the health of our loved ones and to ourselves been dangerously understated? If so, this project is immoral and corrupt.

**Response:**

See response to comment 33.

**COMMENT #83      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

In addition, please answer why in this document 20108-53863-01 availability is August 20th, 2010 when these MVA calculations are part of the genesis of the project. Please answer why is this document not found in 09-1056 but is buried in 06-1115.

**Response:**

The Applicant has provided a series of EMF calculations, including updated calculations for higher operating amperages that could occur under certain scenarios. This information has been included in the FEIS. Note that even under the highest operating amperages, the EMF levels are below limits established in other states (at this time, Minnesota has not established EMF limits).

**COMMENT #84      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

One factor would be that the transmission lines would be placed between agricultural fields that serve as feeding areas and the Shepard Lake complex which serves as a resting area. In this area, it is likely that birds will be traveling between different habitats, potentially increasing the likelihood for avian conflict with the transmission line.

**Response:**

As discussed in Section 7.9.3 of the DEIS, in 2002, Xcel Energy entered into a voluntary Memorandum of Understanding with the USFWS to work together to address avian issues throughout its service territories. The development of Avian Protection Plans for each state the Company serves, including Minnesota, is currently underway to help support the Memorandum of Understanding. This Memorandum of Understanding has been approved by the USFWS. Additionally, to mitigate possible impacts on wildlife, the Applicant is proposing to avoid areas

known as major flyways or migratory resting spots, and span designated high quality wildlife habitat areas to the extent feasible. In areas where complete spanning is not possible, the Applicant intends to minimize the number of structures placed in high quality wildlife habitat, and will be required to work with the MnDNR and USFWS to determine appropriate minimization and/or mitigation measures such as adding transmission line shield wires to the lines.

**COMMENT #85      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

The second factor would be resultant habitat fragmentation. This is caused by transmission lines bisecting of habitats. If transmission lines followed existing corridors this habit fragmentation of the rare and environmentally sensitive area around Shepard Lake will be spared this habit fragmentation loss. The preferred route plows through the southern perimeter of Shepard Lake and then takes a north route along the eastern perimeter of Shepard Lake. We are talking about the rarest of the rare areas left in the United States in this bog complex. It is environmentally irresponsible not only for today but for future generations to disrupt the Shepard Lake Bog complex.

**Response:**

The final alignment has not been selected at this time. Shepard Lake and its surrounding area are presently not managed or protected by the state or federal government. The applicant will continue to work with MnDNR to minimize impacts to sensitive areas.

**COMMENT #86      COMMENT SOURCE:      TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

Shepard Lake has year after year several pairs of nesting sandhill cranes. What is important is that they are similar species with similar habitat requirements to the whooping crane. Sandhill cranes' behavior and flight needs are analogous to whooping cranes. The transmission line's threat that is documented by the U.S. Fish and Wildlife Service officials for whooping cranes is undoubtedly a threat to sandhill cranes. The use of bird flight diverters would be ineffective for these large birds as they have unique requirements for descending and taking off. The only way to mitigate the problem of these large birds according to U.S. Fish and Wildlife Service officials is to reroute the line or go underground with the transmission lines.

**Response:**

See response to comment 85.

**COMMENT #87      COMMENT SOURCE:      TRANSCRIPT****Name: Ebaugh, Dave****Comment:**

The St. Wendel Bog is referenced as it should be, but Shepard Lake, an important 264-acre component of this bog complex, has been omitted. This omission of the Shepard Lake area is obvious when the Minnesota County Biological Survey, which is referenced in section 3.2.5, is evaluated in totality. The Minnesota County Biological Survey clearly shows that the Shepard Lake area should also be added to this section 3.2.5 titled Special Environmental Concerns. Specifically, sections 29-32 of Brockway Township need to be referenced.

**Response:**

This EIS evaluated MCBS Sites rated Outstanding, High and Moderate; efforts were made by the Applicant to avoid or minimize impacts to these MCBS areas.

**COMMENT #88      COMMENT SOURCE:      TRANSCRIPT****Name: Ebaugh, Dave****Comment:**

In addition to the wildlife species mentioned in this section, we must consider nocturnal species of birds. We have observed four species of owls, all of which seem to be plentiful. Central Minnesota has a potential of eight species of owls. I am confident that the Avon Hills area also could document a strong owl population as part of the same biological complex. The owl population is important as special owl mitigation guidelines need to be developed and followed if you choose to place your transmission lines in these sensitive areas.

**Response:**

Mitigation measure for owls would not differ from mitigation for other avian species. Potential mitigation measures for impacts to fauna, such as raptors, waterfowl, and other bird species, are presented in Section 7.9.2 of the DEIS. Possible mitigation measures, including undergrounding in the Avon area are also discussed in Section 7.9.3 of the DEIS.

**COMMENT #89      COMMENT SOURCE:      TRANSCRIPT****Name: Ebaugh, Dave****Comment:**

The physical presence of the transmission lines and the noise given off by these lines are serious disturbances of special concern to the owls. These unique characteristics of owls and our abundant population of owls require special mitigation guidelines.

**Response:**

See response to comment 88.

**COMMENT #90 COMMENT SOURCE: TRANSCRIPT**

**Name: Kerfeld, Carrie**

**Comment:**

And I was wondering what kind of precautions are you talking for farm animals and wildlife?

**Response:**

See response to comment 68.

**COMMENT #91 COMMENT SOURCE: TRANSCRIPT**

**Name: Pung, Kathy**

**Comment:**

Have any health concerns or health issues been addressed of a high voltage line in this document?

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #92 COMMENT SOURCE: TRANSCRIPT**

**Name: Thielen, Dennis**

**Comment:**

I live right on the freeway, and they have an alternative RW, that if you go on -- I believe they're on every section line, where the section lines go through, where you'll find an RW sign right where the fence is located right now. And then if you go about 150 feet back from that you'll find another RW sign. For which I believe back when they surveyed it was an alternative that they could use, if they needed to widen the freeway, it would be that they would not have to resurvey. You have your corridor of 1,000 feet and that would limit that down on either side by, I would say, roughly 300 feet. I wonder if you know that or if anybody's pointed that out to you. And then also I would like to know what kind of lag do they have between the posts, as far as the line itself is concerned. That was my concern about this right-of-way that they have on the section lines. Because if you have that 1,000 foot corridor along the freeway now, and it's my understanding and belief that's the way it is because I'm right on the section line there and I have it on my property, the other right-of-way, which is the alternative right-of-way, is about 150 feet from the fence like on my particular property. It's south and there's also one on the north side of the freeway, which would eliminate about 300 feet, then, of that 1,000 foot corridor that you originally had on the freeway that would be off limits. And you were saying that those poles are 20 feet, roughly, and like his area there, also, he'd have another 50 feet that he couldn't touch because of that right-of-way and so that's why they have to check that out with DOT or whatever.

**Response:**

Poles are located between 600 and 1000 feet apart. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. David Seykora responded to this question in the evidentiary hearing. There would not be additional ROW separation required from the highway in this location. See also response to comment 112.

**COMMENT #93      COMMENT SOURCE:      TRANSCRIPT**

**Name: Roberts, Lucy**

**Comment:**

I was just kind of wondering why can't you put the powerline underground in certain sections?

**Response:**

See response to comment 19.

**COMMENT #94      COMMENT SOURCE:      TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

And regarding EMF, I found a clearer way to say what it is, and I'm looking for it, because the amps are so grossly understated. What would be useful here would be to have a range of amperages from these horrible low rates of 158 and 264 amps up to and including the 1,200 and 1,500 amps that is recorded in the undergrounding estimate, and up to the 3,394 that is the limits of the line, and on there to chart 25 feet, 55 feet from centerline, to have that go out, when you get up to 100, 200, 300 increments, which you get the milligauss levels down and to see how far it takes out from that centerline to get down to that level in various scenarios. And so that's specifically what I'm looking for, and that will be in writing so it's clear, but does that make sense? Do you understand what I am saying?

**Response:**

See response to comment 33.

**COMMENT #95      COMMENT SOURCE:      TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

What is the impact of the power line and existing natural gas lines that run through the same corridor?

**Response:**

Impacts on pipelines, including natural gas pipelines, are discussed in Sections 5.1.2, 6.1.2, and 7.1.2. When a steel pipeline is installed close to a high-voltage AC transmission line, interference

can occur between the transmission line's electromagnetic field and the pipeline, which may result in damage to the pipeline or its protective coating. Since 1971, pipeline safety regulations require cathodic protection systems for federally regulated pipelines to mitigate for such effects. Further, pipeline operators are required to monitor the effectiveness of the cathodic protection system and condition of protective coatings and make repairs as necessary.

**COMMENT #96      COMMENT SOURCE:      TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

But my curiosity is does the electromagnetic fields or any other impacts from that have a negative or a positive impact on that pipeline, and how close can that line be to that. You mentioned corrosion, that would kind of concern me. If you have a high voltage line, you're corroding -- you're causing a gas line containment pipeline to corrode and possibly fail, and at some point then release natural gas in an area where you've got a high power line. And the consequences of blowing that up or something like that; similar to what's happened in California and elsewhere would be a concern.

**Response:**

When an HVTL is located adjacent to a pipeline ROW, the pipeline may be subjected to electrical interference from electric and magnetic induction, conductive interference and capacitive effects. Impacts on pipelines, including natural gas pipelines, are discussed in Sections 5.1.2, 6.1.2, and 7.1.2. When a steel pipeline is installed close to a high-voltage AC transmission line, interference can occur between the transmission line's electromagnetic field and the pipeline, which may result in damage to the pipeline or its protective coating. Since 1971, pipeline safety regulations require cathodic protection systems for federally regulated pipelines to mitigate for such effects. Further, pipeline operators are required to monitor the effectiveness of the cathodic protection system and condition of protective coatings and make repairs as necessary. See response to comment 37.

**COMMENT #97      COMMENT SOURCE:      TRANSCRIPT**

**Name: Hinnenkemp, Luverne**

**Comment:**

You talked about putting this power line 150 feet, you get 150 feet, and then it's going to go in the middle of that. Well, my farm already, the freeway split it right down the middle. So now you're going to take 150 feet, why can't you go right along the freeway? Interstate 90 has got it right along the freeway. Put it on the freeway, fine. But on my property, the middle of the 150 feet, because that would be right in the middle of the field. I'm sure Dennis would say the same thing.

**Response:**

The Applicant has proposed an option that parallels Interstate 94 that would result in occupancy of 50 feet of existing Mn/DOT right of way. In order to occupy roadway ROW, the applicants would need to acquire necessary approvals from the owner or the agency (e.g., Mn/DOT). Mn/DOT's Utility Accommodation Policy outlines the policies and procedures governing use and collocation of state trunk highway ROWs by utilities. The policy was developed in accordance with the requirements of state and federal law (Code of Federal Regulations, Title 23, Part 645, Subpart B). It is designed to ensure that the placement of utilities does not interfere with the flow of traffic and the safe operation of vehicles.

**COMMENT #98      COMMENT SOURCE:      TRANSCRIPT****Name: Kerfeld, Carrie****Comment:**

I feel like you're not putting this power line in for nothing, you're going to get a lot of money out of it. We are getting a one-time deal payment if it is on our land, but you're adding power lines in the future, you're adding more stress to human life and to animals. What are the future generations going to get? What if there's an illness or animals dying, what do we get out of it?

**Response:**

Comment noted.

**COMMENT #99      COMMENT SOURCE:      TRANSCRIPT****Name: Zirbes, Mike****Comment:**

If you were saying that you come within 150 feet of the center of the road to our property, there's several homes that are within 100 feet of the highway. Would those lines go very close to those homes? There are four homes that I know of that are within possibly 100 feet of the road. From north of Interstate 94, north to 17, there's several homes there that are within 100 feet of the road. Would they go out into the field? At one time you said about 500 feet they could go out either side of the road.

**Response:**

See response to comment 13. In addition, the final alignment can be negotiated between the Applicant and the property owner.

**COMMENT #100      COMMENT SOURCE:      TRANSCRIPT****Name: Zirbes, Mike****Comment:**

If they did, we're talking about irrigation, are we going to be able to irrigate with a center pivot under those high lines or not?

**Response:**

Some pole placements may interfere with center pivot irrigation systems. Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on irrigation systems can be addressed in negotiations between the utility and the landowner.

**COMMENT #101 COMMENT SOURCE: TRANSCRIPT****Name: Kerfeld, Rosie****Comment:**

I think I got it right, that you're saying that an irrigation system underneath couldn't be possible if you put a power line over top? So that's eliminating the farmers from putting in an irrigation system after this power line is in. And also, I was under the understanding that once you have this power line you cannot put an electric fence under it to pasture your cattle. So how are you going to do that underneath that put a fence in around it?

**Response:**

Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on irrigation systems can be addressed in negotiations between the utility and the landowner. There could be some induced current resulting from the placing the transmission line near an electric fence. It is anticipated that the current would be in a very low voltage and the fences would need to be grounded. Cattle grazing can occur under transmission lines, the proposed transmission line right-of-way will not be fenced.

**COMMENT #102 COMMENT SOURCE: TRANSCRIPT****Name: Overland, Carol****Comment:**

One of the impacts -- I have a couple here -- if it's in the centerline and it's only 75 feet to the right-of-way, if there are houses within that 75 feet, it could fall over on a house beyond that 75 feet if it's 150 tall or taller.

**Response:**

All transmission line structures and the conductor systems that they support are designed to withstand the transverse, longitudinal, and vertical loads imposed on them by statistical meteorological conditions. Structures are designed to meet the NESC loading requirements and/or other load requirements that exceed the NESC. In most cases, if the line were to fail it would be in the longitudinal or vertical direction with in the right-of-way due to the wires/conductors being connected to each structure. Transverse failures which fail toward the edge of the right of way rarely occur and if they do it is usually caused from an unpredictable natural event such as a microburst, tornado, or other extreme wind occurrence. These extreme

events are unpredictable and hard to design to because the impacts and effects of them are unknown.

**COMMENT #103 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

Anything within the fall zone of a transmission line can't get an FHA loan, and that should be addressed in the EIS as a socioeconomic impact.

**Response:**

The State is aware of the limitations on FHA loans for properties in proximity to transmission line corridors.

**COMMENT #104 COMMENT SOURCE: TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

With regard to the compensation, just to kind of give a little more clarity to that from my perspective as I understand it, each individual property owner needs to negotiate with the power company individually to determine what their compensation is going to be, and currently that is a one-time compensation that's paid to the individual. As an individual trying to negotiate with the power company the size of Xcel Energy and their subsequent owners, whoever they might be in the future, it makes it difficult from an individual landowner standpoint to have a fair negotiation. What opportunities -- or what exists within the state government organization to protect those landowners simply being run over by this larger entity?

**Response:**

See response to comment 20.

**COMMENT #105 COMMENT SOURCE: TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

And then the second question is can that be reopened in the future to additional compensation if things change? For instance, the pivot point irrigation system, if I'm not a farmer right now, with land along that corridor and I don't have pivot irrigation and in the future I would determine that it's beneficial and the climate changes or whatever else happens, and all of a sudden I need to irrigate or changing my crop such that I need that irrigation, what alternatives do we have, or is that simply a matter for the courts and the court systems become the arbiter of last resort?

**Response:**

The Utility will provide compensation in the form of a one-time easement payment to property owners who host power lines. Property owners retain ownership of the land and may continue to use the land around transmission structures. Alignments can be designed to minimize impact to existing center-point irrigation systems. If future land use plans for property include a potential center point irrigation system, the property owner should address such issues at the time of easement negotiation with the Utility.

**COMMENT #106 COMMENT SOURCE: TRANSCRIPT****Name: Thielen, Marvin & Judy****Comment:**

One is on the wetland protection area, this area right here, the water table is up to about 30 feet, and you're going down up to 50 feet with the towers.

**Response:**

Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Placement of a pole in the water table would not have a significant impact on groundwater availability or quality. Pole foundations are typically 25 feet deep; however, in shallow water table environments, modified foundation designs could be developed to avoid intersecting the water table. Such designs could be implemented in areas where groundwater resources are highly susceptible to contamination from surface spills.

**COMMENT #107 COMMENT SOURCE: TRANSCRIPT****Name: Thielen, Marvin & Judy****Comment:**

The other thing is, access to this power line after it goes through, if you have a 150-foot corridor and you got some miles running through our property, how many accesses do we have to allow for that?

**Response:**

Access requirements would be coordinated with property owners as part of the easement negotiation process with the Applicant.

**COMMENT #108 COMMENT SOURCE: TRANSCRIPT****Name: Borgerding, Cliff****Comment:**

Can you then explain what the potential -- is there a potential impact on water supply with having these platforms and piers and what not penetrating an aquifer and what the potential problems are related to that?

**Response:**

Construction of the project would conform to all rules and regulations of the required MPCA stormwater construction permit. Conditions of this permit would guard against any contamination of groundwater resources during construction. No impacts to groundwater are anticipated.

**COMMENT #109 COMMENT SOURCE: TRANSCRIPT**

**Name: Thielen, Mark**

**Comment:**

On those poles, just like a well, we have to stay back. As farmers, if we have a well close to our fields, we have a 150-foot setback from spreading manure or anything, and if you dig a hole down, the same thing as a casing, and material can go right alongside that casing because you dug the ground up and you offset it and that's just like a drain plug.

**Response:**

The proposed project is not anticipated to impact groundwater resources or drinking water wells.

**COMMENT #110 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

And along this line, that's something that should be in the DEIS, is that very point. Also, the impacts of leaching of the concrete. Do they use coal ash, it's a high probability that they might, coal ash has a lot of things you don't want in your water supply. That should be in the DEIS.

**Response:**

Construction materials required for the project would conform to any and all applicable American Society for Testing and Materials (ASTM) standards. The EPA does not regulate coal ash or the reuse of coal ash as a hazardous material as defined by "Identification and Listing of Hazardous Wastes" (40 CFR pt. 261). The EPA specifically addressed coal ash disposal and reuse in "Notice of Regulatory Determination on Wastes From the Combustion of Fossil Fuels" 65 Federal Registry 32214-32237 (2000).

**COMMENT #111 COMMENT SOURCE: TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

When you remove the soil spoils, whatever, are you scraping off all the topsoil and replacing that up to the power pole again? Or if you go and scrape all that topsoil off then you've spoiled that ground for growth, and either the farmer is going to have to go back and do something, or are you taking the precaution to strip off all the topsoil first and then the spoil?

**Response:**

Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on agricultural operations can be addressed in negotiations between the utility and the landowner. Issues such as topsoil impacts and mitigation are addressed in more detail in the utility's Agricultural Impact Mitigation Plan, which was included in the DEIS.

**COMMENT #112    COMMENT SOURCE:    TRANSCRIPT****Name: Borgerding, Cliff****Comment:**

The right-of-way and using the freeway right-of-way. If I understand correctly, earlier you mentioned that the power line could run along the freeway, but that, in fact, it cannot be in the freeway corridor; is that correct? And the fact that DOT, after the I-90 process down south, has taken a stronger position on that and is not in favor of having that sort of thing happen along the freeway corridors?

**Response:**

To address MnDOT concerns with this encroachment into the airspace above existing transportation ROW, the Applicants have proposed to place poles an average of 25 feet from the edge of the existing I-94 ROW. This would leave approximately seven feet between the end of the davit arms and the existing ROW. This gap could provide some buffer for “blowout” of the lines – a situation where the actual conductors sway out of their normal position due to high winds. Section 1.5 of the DEIS discusses the potential conflicts with the I-94 ROW in further detail.

**COMMENT #113    COMMENT SOURCE:    TRANSCRIPT****Name: Vouk, Tom****Comment:**

We've talked about how much this has cost so far. Would you care to comment on that for what the state has already invested in this program? I'm asking that question. How much has this cost to this point to get it to here?

**Response:**

The Applicant bears the cost of the permitting process; these costs are generally passed on to the rate payer. The State's General Fund is not directly impacted.

**COMMENT #114 COMMENT SOURCE: TRANSCRIPT****Name: Vouk, Tom****Comment:**

With everything you're putting together, the reason why I'm asking that question, we had this discussion already and you're not allowing all of the comments that were passed through the system to be integrated into the next logical step. Why? We've spent all these millions of dollars to get to this point, yet we have to start over from ground one with the judge instead of allowing all the comments that we garnered for the last two years to be applied to this project. It doesn't make any sense at all. Does it?

**Response:**

See response to comment 43.

**COMMENT #115 COMMENT SOURCE: TRANSCRIPT****Name: Franz, Neil****Comment:**

First of all, with respect to the water resources. I have a particular concern about route E. Route E traverses a north-south route from Albany down toward Big Rice Lake and then over and eventually around Big Fish Lake. Along that route it traverses nearly five miles of continuous lakes and wetlands starting at the Sand Lake and Mud Lake and Henry Lake and going on to a large wetland, Mud Lake, Clear Lake, and finally Big Rice Lake. These are important -- this is an important area primarily because of wildlife impacts. It's very obvious this time of year that there is an extensive usage of this route with interconnected waterways and as proposed route E would run adjacent to all of that. In addition to the usual waterfowl we have a regular influx of pelicans in the spring, nesting, swans, bald eagles, and then the other waterfowl. And I think the potential impact of the route on those issues is understated.

**Response:**

At the time of route selection a delineation of potentially affected water resources located along the selected route will be performed. The Applicant would minimize impacts to water resources by spanning the resources where possible. Any unavoidable impacts to water resources would be identified prior to construction and mitigated for in accordance with all federal, state, and local permitting conditions. Potential impacts to fauna, such as raptors, waterfowl, and other bird species, are presented in Section 7.9.2 of the Draft EIS. Possible mitigation measures are discussed in Section 7.9.3 of the Draft EIS.

**COMMENT #116 COMMENT SOURCE: TRANSCRIPT****Name: Franz, Neil****Comment:**

The aesthetic impact on particular routes. Our section of the area is the western boundary of the Avon Hills area. Glacial rains, glacial wash plains, and in particular the visual impact of the potential sitting is much more profound in this area because of considerable change in grade. I don't believe that the view shed analysis contained in the EIS accurately or completely describes the visual impact, which I believe is of a greater impact in this area than in the priorities of the route.

**Response:**

Possible mitigation measures, including undergrounding in the Avon area are also discussed in Section 7.9.3 of the Draft EIS.

**COMMENT #117 COMMENT SOURCE: TRANSCRIPT****Name: Franz, Neil****Comment:**

There's also an overstatement of impact, and this comment relates to route D, the proposed undergrounding around the troublesome brief area between Upper Spunk and Middle Spunk Lakes in the Avon area. My concern here is that the routing option that was asked to be considered in the EIS was in error, and for that reason that error has now been amplified in the EIS, because they are being asked to consider, analyze, and provide input about a ten-mile underground dig. I mean, this is nonsense. And to that point, it seriously overstates what the impact should be. And in the Final EIS there should be an analysis done that is properly limited to the necessary undergrounding to ameliorate concerns of the utility companies and also recognize what really needs to be done.

**Response:**

The underground areas were selected by the Advisory Task Force (ATF) for evaluation in the DEIS. The ATF was charged with indentifying local concerns and alternative transmission line routes. The three areas selected to be undergrounded were determined by prioritizing the critical areas where undergrounding would be most beneficial. Shorter options would likely drive the per-mile costs up because a transition structure would be required at every point the transmission line transfers from above ground to below ground. However, the final route could include any viable combination of aboveground and underground segments.

**COMMENT #118 COMMENT SOURCE: TRANSCRIPT****Name: Greer, John****Comment:**

The route identified as route D, which is essentially the one you've just been discussing down the Interstate 94, if that route were chosen and if it were an overhead route through the city of Albany it would have a very dramatic economic and aesthetic impact on the city of Albany.

**Response:**

The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The powerline could be constructed in a way so as avoid impacting property access or development opportunities. Once a final alignment is selected the Applicant will work with residents to address potential mitigation measures as discussed in Section 5.3.3.

**COMMENT #119 COMMENT SOURCE: TRANSCRIPT****Name: Greer, John****Comment:**

Essentially it doesn't identify which side of the interstate it would go on, but it would either have to run through the golf course or it would have to go through the industrial park and either one would have a very significant impact on the city of Albany.

**Response:**

The final alignment has not been selected at this time. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. In the Draft EIS it has been noted that the preferred alignment would be on the south side of Interstate 94 (refer to the maps in Appendix H).

**COMMENT #120 COMMENT SOURCE: TRANSCRIPT****Name: Greer, John****Comment:**

It would essentially destroy the golf course and it would also destroy expansion capabilities of some of the businesses in the industrial park.

**Response:**

The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The powerline could be constructed in a way so as avoid impacting property access or development opportunities.

**COMMENT #121 COMMENT SOURCE: TRANSCRIPT****Name: Greer, John****Comment:**

Wells Concrete has a \$10 million expansion just south of Albany here on the edge of the industrial park. If they were to run adjacent to that facility they would essentially be landlocked, they would not be able to expand in the future, which it would have a dramatic impact on them which would result in a dramatic impact on the city of Albany.

**Response:**

Amended Scope Option 4, which added 3000 feet to Route E was, incorporated EIS analysis to provide flexibility to avoid the Wells Concrete Expansion. The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The powerline could be constructed in a way so as avoid impacting property access or development opportunities.

**COMMENT #122 COMMENT SOURCE: TRANSCRIPT****Name: Hemker, Joan****Comment:**

I live north of Freeport County Road 39. I have Hemker Park and Zoo. I'm very concerned about the aesthetic effect that this power line would have because it would run right over what I think, if I'm looking right, over my penguin barn.

**Response:**

The final alignment has not been selected at this time. At this location the proposed transmission line, as shown in Appendix H of the Draft EIS, is located on the north side of County Road 39 west of the Hemker Park and Zoo and crosses over to the south side of County Road 39 east of the Hemker Park and Zoo. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. Once a final alignment is selected the Applicant will work with residents to address potential mitigation measures as discussed in Section 7.3.3.

**COMMENT #123 COMMENT SOURCE: TRANSCRIPT****Name: Hemker, Joan****Comment:**

I'm open to the public and I think that would be a financial burden to me also to have a power line running right through my property of a zoo that is being established and growing in this area. So I guess I would like someone to look at that and see what it would do to the public having a zoo in this area for all of the towns around.

**Response:**

See response to comment 122.

**COMMENT #124 COMMENT SOURCE: TRANSCRIPT**

**Name: Eiden, Kari**

**Comment:**

Has anybody come out? We come to the meetings, but it would be interesting to have somebody come out, walk my property, see my animals, see my kids, see how it would affect me. Has that been done, is it in the works, or is it just public meetings?

**Response:**

The purpose of the EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. Data collection includes desktop survey, windshield surveys, aerial photography review. The review is restricted by available staff time; OES also chooses not to show preferential treatment to individual landowners by scheduling personal meetings.

**COMMENT #125 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

On page 5-12 it talks about displacements and it talks about proximity of the line and there's a chart. What does that mean, proximity of a line? Does that mean how close those are to the centerline or to the edge of the right-of-way? It's on page 5-12. I have some questions. 5-12 of the EIS. And I want to know what you mean by proximity of alignment, because there's a chart that has various distances based on that and I have some questions. Does that mean centerline or to the edge?

**Response:**

The proximity of a line is the distance from the proposed transmission line centerline to a residence. The Applicant chooses not to allow residences to be located within the proposed 150 foot wide ROW for the transmission line, which means the closest distance a resident can be located is 75 feet from the proposed transmission line centerline.

**COMMENT #126 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

This goes back to the issue of 130- to 175-foot towers and 75 feet from the center to the edge of the line. I'd like some consideration as to why displacement is characterized within 75 feet and not within the fall over distance, which will move it, say, over the 75 feet. And how many homes are within that fall over distance, that should be in the EIS somewhere. And I also notice that

there is a substation in Alexandria, but I don't see anything about substation noise. There's quite a few sections that talk about noise, but substation noise is never addressed that I can see. Did I miss something?

**Response:**

There are no legally defined distance standards between residential properties and transmission lines or towers; a residential property would not be located within the proposed ROW of the transmission line or 75 feet on either side of the transmission line centerline. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. Concerning substation noise: the Alexandria substation is an existing substation which is being upgraded. It is currently not within a noise sensitive location and the upgrades are not anticipated to increase noise noticeably. The proposed St. Cloud substation is being sited within an area zoned either municipal or industrial, is not near noise sensitive land uses, and is therefore not anticipated to present any noise guideline exceedances.

**COMMENT #127 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

Well, it should be there if it's not. Also, scenic byways are mentioned, but when you look in the maps that are in that appendix, I don't see them on the legend and I don't see them incorporated into those maps. And one option is right along Highway 27 and the Glacial Ridge Trail Scenic Byway, and that's not on the maps so it's not demonstrated there. And that should be in there. Specifically 24 is an example of that, because in all of those maps there is no legend for scenic byways and that should be in there.

**Response:**

The scenic byways have been added to the figures in Appendix C of the FEIS.

**COMMENT #128 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

Historical resources, I don't see any mention of century farms, which is a state fair and the farm bureau program when people have over a 100-year plus history on the same farm and that would be a historical resource and I don't see any mention of that anywhere.

**Response:**

From the earliest acquisition of territory to the recognition of the State, farming has been a major part of Minnesota's past. In 1976 the Minnesota State Fair and the Minnesota Farm Bureau teamed up to formally recognize farming families through a program know as Century and Sesquicentennial Farms. Since the program's inception over 8,500 Minnesota farms have

received the title “Century Farm” and over 90 farms the “Sesquicentennial Farm” title. This designation is given to farms that are over 100 years or over 150 years respectively, are at least 50 acres or larger in size, and owned by the same family throughout its history. While the designation of the farm is notable, the designation does not reflect on the historic significance of the property from a National Register of Historic Places eligibility stand point. Properties listed on the National Register of Historic Places are evaluated for their historic significant and integrity to their historic context. In order for the farm to be consider eligible for its historic significance it would need to be an exemplary specimen of historic value and have enough integrity left for an observer to feel as if they were there when the historic significance happened. The designation of “Century Farm” or “Sesquicentennial Farm” does not automatically relate to the farm property having historic significance, value, or integrity.

**COMMENT #129 COMMENT SOURCE: TRANSCRIPT**

**Name: Borgerding, Cliff**

**Comment:**

One thing I wanted to note is a gas line that's shown passing through, this would be the property at Freeport, in that area where it turns north on the King's Lake Road. And that the gas line as depicted on there is way off in terms of where it physically actually is. And then, secondly, there is a new -- I believe someone else here may know more information about that -- there is an oil pipeline that comes down from Canada that comes through Albany Township here near the current sportsmen's club, I believe, there is a large weigh station or some sort of a control unit or something at that point as well. And then also I noticed that, you know, the previous speaker mentioned some of the scenic areas and also the Lake Wobegon Trail, if that could be shown on that as well as any other trails that are adjacent to where the power line may come through, it would be useful to know.

**Response:**

The state pipeline data was obtained from the Minnesota Geospatial Information Office. The data was created to provide a general overview of major gas and liquid pipelines in Minnesota. The data set does not provide precise locations of the pipelines and does not include all pipelines or branches of pipelines. The Lake Wobegon Trail has been added to the Figures in Appendix C.

**COMMENT #130 COMMENT SOURCE: TRANSCRIPT**

**Name: Morgel, Christine**

**Comment:**

I just wanted to say I live on County Road 3, and it has a lot of wetlands and a lot of wildlife, a lot of deer, farmland, and I just hope that they don't pick this area. Everybody has there own place and they don't want it on their place, but I just have to make a comment that it kind of hits home when it could be running through your land and so I just want to make that comment.

**Response:**

Comment noted.

**COMMENT #131    COMMENT SOURCE:    TRANSCRIPT**

**Name: Farry, Joe**

**Comment:**

Both routes C and D have collateral damage. They're not exclusively on I-94, they involve other sections. Secondly, I would really appreciate it if people would say not that we should put it on I-94, this is the correct way to say this, put it on the property owners who live near I-94. These towers are not going in the highway right-of-way, they're going on the adjoining neighbors' property. Those adjoining neighbors' homes, property, trees, are going to be destroyed just as well as if they go down routes A, B, C, or any other route. Being near I-94 doesn't give you any kind of immunity. There is no such thing in this area as a route on a map of no destruction.

**Response:**

Comment noted.

**COMMENT #132    COMMENT SOURCE:    TRANSCRIPT**

**Name: Farry, Joe**

**Comment:**

The last point I want to make, I'm only familiar with one area in this plan, and I think it was called sheet number 89 dealing with the area of my house. And I talked to a gentleman from the Commission and I wanted to find it because he reinforced the fact that this is a draft. Because on that one sheet my house is not listed even though I'm within 300 feet of the line. I could not receive any materials because they didn't know I existed and I've been involved in this process for three years. They have missed streets, put them in the wrong place. There are three property owners whose land is on the Wobegon Trail whose homes are not listed and are not seen on that. One property owner who loses his land, he's in double jeopardy, he loses land in either route D or C, and yet until I talked to him last week and he was completely unaware of it. So the failures to mark homes on these maps is more than just a kind of oversight, it has deprived individual citizens of the right to be heard. So my question about revising this environmental impact statement, you can't fully calculate the cost of this if you don't know who exists. Who are you hurting? No computer, it is garbage in, garbage out. If you don't have correct information to begin with, you don't have correct information after you squeeze it through a computer program. This particular section misses wetlands and all sorts of things that local property owners can testify to. So I would just urge all of you to look at these maps and look at the local area.

**Response:**

The Applicant identified both assumed residential and non-residential structures (barns, sheds, detached garages, etc.) as discrete data points to the extent possible based on field reconnaissance via publicly accessible roads and aerial imagery interpretation. OES reviewed the information provided by the Applicant. It is possible structures may not have been accounted for if there was not a clear view of them from publicly accessible roads due to distance or other obstructions such as existing vegetation, or they were not discernable based on aerial imagery interpretation. Individuals included on the Office of Energy Security mailing list are notified of the meetings. Meeting notices are also posted on the PUC website. In addition, OES made notification of the scope to all land owners along routes identified in the scoping process.

**COMMENT #133 COMMENT SOURCE: TRANSCRIPT****Name: Moskowitz, Sanford****Comment:**

One of the strengths of the university is not just the fact that it's known for being in an environmentally protected area, but it itself is a strong environmental university. It attracts students into disciplinary from around the country and the environmental studies department as well as their disciplines related to them are shocked that this sort of thing will be potentially built right on their land right next to them for all to see and it will do damage to the reputation of the school. So at least that's the general feeling and that's collateral damage and that's quite significant for this area because the school is an important fixture in the area. So that's just some comments on that.

**Response:**

Comment noted.

**COMMENT #134 COMMENT SOURCE: TRANSCRIPT****Name: Drake, Tim****Comment:**

At this point the transmission line can go anywhere within that project area? At what point does it whittle down so you would now where it's going? How far along in the process is that going to be?

**Response:**

Under the Power Plant Siting Act a specific route is not identified in the Draft EIS or FEIS. The EIS will be used by the Minnesota Public Utilities Commission to make a decision on the final route.

**COMMENT #135 COMMENT SOURCE: TRANSCRIPT****Name: Drake, Tim****Comment:**

As a member of the North Route Citizens Alliance, I just want to reiterate that we believe that the transmission line should go along existing routes, that's why we bring up I-94, the Wobegon Trail, because we have existing routes that can be used rather than putting it in places where there are no existing routes and I just want to reiterate that. I also want to note an omission that I saw in the environmental impact statement.

**Response:**

Comment noted.

**COMMENT #136 COMMENT SOURCE: TRANSCRIPT****Name: Drake, Tim****Comment:**

I don't know if this would be under the archaeological and historic resources, but the fact that at least along the preferred route there are more than 40 century farms that would be impacted by that route. If that's in the environmental impact statement, I missed it, but I did not see that in the impact statement.

**Response:**

See response to comment 128.

**COMMENT #137 COMMENT SOURCE: TRANSCRIPT****Name: Braun, Bruce****Comment:**

I live on County Road 3, which is proposed route B. A couple of the environmental questions that I have are regarding the Marsh Woods, which is an SNA site, and Tamarack Woods, which is an environmentally sensitive area as well. And based on what I've heard and you take a power line and you just clear cut everything within that area, and on a yearly basis you are spraying the foliage to keep the vegetation from growing, when you spray that there are going to be wild animals in those environmentally sensitive areas alone that will feed off of that foliage and that's going to kill them, I don't care what you say. Also, going through an SNA site, which is a Minnesota protected site, you can't even remove a piece of wood from them.

**Response:**

As stated in the DEIS in Section 7.9.2, the St. Wendel Tamarack Bog SNA is one of the top two sites for Significant Biological Diversity in Stearns County and is a large wetland complex, which encompasses one of the largest remaining blocks of native vegetation in the county. The SNA is approximately one mile west of the Applicant Preferred Route and is not impacted by the

alignment. Permanent vegetative changes would take place within the right-of-way. Trees and shrubs that may interfere with maintenance and the safe operation of the transmission line would not be allowed to establish within the right-of-way. Typically, vegetation is controlled mechanically on a regular maintenance schedule; herbicides are not routinely used. Vegetation that does not interfere with the safe operation of the transmission line is allowed to reestablish within the right-of-way after construction. In addition, permanent impacts would be required at each pole location. The permanent impacts are estimated at 55 square feet per pole.

**COMMENT #138 COMMENT SOURCE: TRANSCRIPT**

**Name: Braun, Bruce**

**Comment:**

On a minor note, wireless technology, you know, you have your computers that are wireless transmissions, your cell phones, your satellite televisions, all of this, how is that going to affect that? If it does affect it, how are we going to be compensated for it? Because obviously a route is going to be chosen, one route, and those are going to be issues regardless of where it goes, so those are just minor things that are on everybody's minds.

**Response:**

Wireless technologies are discussed in Sections 5.5, 6.5, and 7.5 of the Draft EIS. Interference with wireless technologies is not anticipated. Once final alignment is selected, the applicant would work with individual property owners if interference is experienced.

**COMMENT #139 COMMENT SOURCE: TRANSCRIPT**

**Name: Stock, Gibb**

**Comment:**

We talk about going through the woods and destroying stuff. My son is on the farm now, and to take 150 feet off of the end of fields or off the side of the fields, either way it's going to take money out of his pocket and he's trying to make a living farming. So I suggest they go through the woods or the swamps or someplace else and keep the farmland for producing food.

**Response:**

The final alignment has not been selected at this time. The Applicant will provide compensation in the form of a one-time easement payment to property owners who host power lines. Farming activities can continue within the easement beneath the transmission line.

**COMMENT #140 COMMENT SOURCE: TRANSCRIPT**

**Name: Traut, Jody**

**Comment:**

I'm representing the City of Avon today. And I just wanted to reiterate what this gentleman said, about the idea that although the 94 corridor exists, the existing corridor, we just want to keep in

mind that that doesn't mean that the lines are going to go through existing right-of-ways. And there are plenty of homes, the population density there is a little thicker because it's in town.

**Response:**

Comment noted.

**COMMENT #141 COMMENT SOURCE: TRANSCRIPT**

**Name: Traut, Jody**

**Comment:**

There are plenty of homes that we're concerned about losing, but also the idea that this outside of the interstate all concerns us because our major employers are located there. So I just wanted that on the record that we're concerned about residential displacement, but also the impact on our local economy.

**Response:**

Comment noted.

**COMMENT #142 COMMENT SOURCE: TRANSCRIPT**

**Name: Drake, Mary**

**Comment:**

My question is -- my first thought is that why, on 94, why does it have to go through people's homes? Why does it have to go off 94? If you have it next to the freeway there's no bogs, there's no homes right along the freeway, that to me seems like a logical thing. The second thing is why can't it go through a rest area? There's no people living in a rest area, there's no children who will be affected as they grow up with the health risks of having been raised in a place that has high voltage going nearby. There's laws, if there's laws that it can't go through a rest area, there's also laws that you're not supposed to create a new corridor when there's an existing corridor that can be used. Those laws are being broken.

**Response:**

The EIS analysis examines the social, economic, and environmental impacts associated with multiple routes, including issues associated with the use of existing rights of way, new corridors, and policies established by other agencies (such as the Mn/DOT and Federal Highway Administration policy concerning transmission lines in rest areas).

**COMMENT #143 COMMENT SOURCE: TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

I think it's bad enough to have to have EMFs here 24/7, and then be showered by these hazardous chemicals once or twice a year for maintenance. What I am concerned about is the

mitigation guidelines that I see lacking. There's some excellent guidelines for organic farmers, and many of us do not have large-scale operations, but we consider it an organic farm, we produce, like ourselves produce organic eggs, apples and so forth and give those to friends and for our own consumption. What's going to happen to our way of life if we have to have these chemicals? I don't know exactly what they are, by the way. What kind of way of life will we have when these chemicals come showering down by us by these helicopters or whatever on your maintenance schedule?

**Response:**

The Applicant states they would very rarely use chemical herbicides to control the growth of vegetation. In general, where vegetation would need to be controlled, physical control methods would be used, such as mowing or cutting. Aerial application of herbicides would not occur; if herbicides were to be used, spot application methods would be used.

**COMMENT #144 COMMENT SOURCE: TRANSCRIPT**

**Name: Eikmeier, Tim**

**Comment:**

I'm wondering if David knows how many houses are being affected if they stay along the freeway coming within 150 feet of their house. A lot of people drive the freeway, they don't look at it. They don't see a lot of houses that are in the wooded area. Right along the freeway, there's a lot of houses being affected. When the freeway came through they didn't look at where those houses were, they went right alongside of homes, some they took out. They went over farmland, a lot of fields were affected.

**Response:**

See response to comment 132.

**COMMENT #145 COMMENT SOURCE: TRANSCRIPT**

**Name: Stock, Gibb**

**Comment:**

Our young children growing up underneath these power lines. If we can stay away from the homes, that's what we should do. The wildlife is going to survive.

**Response:**

Comment noted.

**COMMENT #146 COMMENT SOURCE: TRANSCRIPT****Name: Heim, Kathleen****Comment:**

I've lived on this property over 50 years and it's also a century farm and I think we should keep it that way for food production for the future just like Gibb Stock.

**Response:**

See response to comment 128.

**COMMENT #147 COMMENT SOURCE: TRANSCRIPT****Name: Farrol, Joe****Comment:**

There are two reasons to raise this question. When we talk about cost, who is going to pay, I think the argument is everybody who is in the grid. The grid prices are going to go up. We're talking 10, 15 million people. This is a \$250 million project, 10 million people pay 50 cents more on their monthly billing for 15 years, I'm just speculating, but it's going to be that level. The reason I bring this up is because they tell us that it can go underground, and I'm not in favor of underground, if you go underground it's going to raise the costs. Think of that 50 cents to get what we're getting above ground, a buck a month to get underground. I don't know all the figures, but the point I want to make is we calculate electric costs, we know what the costs are when you distribute it, when you create it, we know what it's going to cost. What's been happening is you try to squeeze the distribution costs to keep the consumer's cost down. The consumer buys cheaper electricity because when they come through my house they will pay fair market value and they have the right of eminent domain and I don't have much to negotiate with and they give me a one-time payment for the land they take from me and that's a really cheap way to distribute electricity. I don't get any fees because they are making money off of it. We keep distribution costs down so electricity will be affordable. This is a bigger question and all that, but haven't we reached a time when the consumer should know this is the real cost of this electricity? Both the production costs and the distribution costs. What we're all facing here is we're going to get squeezed in order to make it cheaper for millions of consumers that pay 25 cents less on their bill.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. According to the Utility, transmission costs generally make up 7-10 percent of a customer's monthly bill.

**COMMENT #148 COMMENT SOURCE: TRANSCRIPT****Name: Ebaugh, Dave****Comment:**

The comment on kind of like the business plan, the construction, distribution and so forth, if Xcel had to pay for all the destruction that they're causing it would not be a viable business plan, period. And let me bring to light a bill here that has been passed, that if they go through our land and you cannot live with it, they will pay 60 percent of the condemnation value. Now, I'm not sure what it is, but I know it's less than the market value. We're in a precipitous value of depreciation, and so let's say, for example, to make it easy, your land offer is \$200,000, you're going to get from Xcel an offer that you can't afford to pay because you've got to live there.

**Response:**

See response to comment 20.

**COMMENT #149 COMMENT SOURCE: TRANSCRIPT****Name: Schmitt, Brent****Comment:**

Can we get it more specifically analyzed within accordance to the nonproliferation? Because I want an apples-to-apples comparison to say how much this is affecting. On my portion of the route there's a 14.5 mile stretch of which 74.1 percent of the miles are, for lack of words, breaking the law. So I would like a further analysis of that.

**Response:**

A table comparing the extent to which the routes follow existing rights of way has been included in the FEIS.

**COMMENT #150 COMMENT SOURCE: TRANSCRIPT****Name: Heim, Kevin****Comment:**

When the request was originally made, the economy was doing really well and there was an expected need for extra electricity. And that may have actually been an illusion just because of the economy. Has that changed? Is there really such a need for this much electricity growth that justifies this power line?

**Response:**

The need for this transmission line has already been established in accordance with state HVTL routing requirements; The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. OES has reviewed Applicant's statement of purpose and found it to represent the project need as established in the Certificate of Need PUC Docket No. 06-1115.

**COMMENT #151 COMMENT SOURCE: TRANSCRIPT****Name: Reisner, Shawn****Comment:**

Have they been done on every route or just the preferred route? And as far as the legend goes with these alternative routes, how does it follow through? Does it go from north to south, does it jump around? I'm a little bit confused on what's your first option, what's your second option, what's your third option?

**Response:**

The Draft EIS evaluates all the routes equally. The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of all route alternatives.

**COMMENT #152 COMMENT SOURCE: TRANSCRIPT****Name: Reisner, Shawn****Comment:**

I've heard really fantastic numbers as far as what it would cost to go underground. I'm assuming St. John's has an issue with going through by 94 and keeping it coming down 94, what is the cost of going above ground versus underground?

**Response:**

Estimated costs for Route D and undergrounding approximately 13 miles of Route D are summarized in Table 1.6-1 of the DEIS in 2009 dollars. This table is included in the FEIS. Final costs will depend on the final route permitted and the final alignment developed.

**COMMENT #153 COMMENT SOURCE: TRANSCRIPT****Name: Vouk, Ray****Comment:**

At the last meeting, I believe it was, it was said that if you went underground you have to go under the lake in Avon, there is nothing about going underground past St. John's that I recall. Why would you have to go underground past St. John's?

**Response:**

An alternative that includes an option to go underground near Avon and near St. John's has been included in the EIS. In the Avon area, the underground portion of the line would not be beneath a lake.

**COMMENT #154 COMMENT SOURCE: TRANSCRIPT****Name: Hafner-Fogarty, Rebecca****Comment:**

I just wanted to ask, you have the green preferred route there and you have a number of alternative routes, have those alternative routes been ranked in order of preference or are they just all equal in preference at this point?

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of all route alternatives, all are considered equal for comparative analysis.

**COMMENT #155 COMMENT SOURCE: TRANSCRIPT****Name: Fox, Kurt****Comment:**

I live in Avon, Minnesota, fairly close to Highway 94, and I prefer not to have the line run down 94. I was wondering if the power company representative could tell us why the preferred route was one that was preferred and why the company didn't elect as a first choice to run it down 94?

**Response:**

The Applicant and the State have discussed the reasoning behind not selecting the Interstate 94 corridor in the St. Cloud to Avon area throughout permitting process. It is the State's understanding that the Applicant did not choose this as a corridor because it would have impacts on wooded areas, lakes, a cemetery, a Mn/DOT rest area and several commercial and residential buildings.

**COMMENT #156 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

With regards to the EIS. We analyzed the draft environmental impact statement, and there's two things I want to address. The first of which is significant impacts that we've identified in the DEIS with regard to the north routes. Number one, the north routes have a higher aesthetic impact than several of the routes. Notably, aesthetic impact meaning number of homes within 500 feet or the 1,000-foot easement. It has more homes than routes on C and E. And with that we did an evaluation of the DEIS and the DEIS maps and they suggest numerous underreported or missing homes within the DEIS, as many as 115. Currently they have 83, routes with 83 homes in the preferred route, up to 115 homes may exist and these may include pole buildings that are converted into homes. I want to go over the NORCA executive summary that was submitted to the OES as a comment back in February. It identified in the preferred

route 112 homes. So we feel the number of homes within the 1,000 - foot easement is actually underestimated for the north routes.

**Response:**

See response to comment 132..

**COMMENT #157 COMMENT SOURCE: TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

The north routes contain the highest impacts to prime farmland, land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses. Avoidance of these areas would be consistent with the Stearns County Comprehensive Plan. The preferred route, route A and route B all have the highest concentrations of prime farmland versus all the other routes. With regards to the Stearns County Comprehensive Plan. Goal number one is to sustain agriculture as a desirable land use over the long term. And with that, objective number two of goal one is to preserve highly valued farmland for agricultural pursuits. So we feel that running a high voltage transmission line through these areas directly defies the Stearns County Comprehensive Plan it that's going to be taken into account.

**Response:**

The final alignment has not been selected at this time. The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives which includes impacts to prime farmland. The development of alternative corridors considered the minimization of impacts to the environment, including prime farmland and other agricultural land, by following existing property lines and right-of-way to the extent possible. The transmission line does not preclude agricultural land uses. In addition, the utility has prepared an Agricultural Impact Mitigation Plan that provides options for minimizing or mitigating agricultural impacts; a copy of this plan was included in the DEIS.

**COMMENT #158 COMMENT SOURCE: TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

The north routes contain the highest number of water wells versus the other routes. And the concern there is the impact on temporary and permanent contamination. The north routes contain a significantly higher number of total NWI wetlands impacted versus the other routes. NWI is National Wetland Inventory. Specifically, it has significantly more total acreage NWI wetland acreage, significantly more fresh water emergent wetlands, significantly more fresh water forested and shrub wetlands and also significantly more fresh water ponds. The north routes contain a significantly higher number of floodplains impact versus other routes. And this is highly regulated by the state and FEMA. The north routes contain a higher number of perennial

stream crossings versus other routes and the highest concentration of nonagricultural vegetation impacted versus the other routes.

**Response:**

At the time of route selection a delineation of potentially affected water resources located along the selected route will be preformed. The Applicant would minimize impacts to water resources by spanning the resources where possible. Any unavoidable impacts to water resources would be identified prior to construction and mitigated for in accordance with all federal, state, and local permitting conditions. After route selection the applicant will coordinate with all floodplain authorities to ensure the project conforms to any design and specification requirements for floodplain development. Potential impacts to non-agricultural vegetation is discussed in Section 7.9.2 of the Draft EIS and possible mitigation measures are presented in Section 7.9.3 of the Draft EIS.

**COMMENT #159    COMMENT SOURCE:    TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

The second thing is what we see as holes in the draft environmental impact statement or some needs for corrections and clarifications. Number one, the DEIS lacks specific physical route comparisons from Sauk Centre to St. Cloud. And this is an apples-to-apples comparison. This would include things -- physical elements to the route from Sauk Centre to St. Cloud, such as the total length of each route, the complete cost estimate for each route from Sauk Center to St. Cloud, and the total percent of proliferation of new transmission corridors. These comparisons were completed by the applicant for the advisory task force and must be included in the draft environmental impact statement as well as the final environmental impact statement.

**Response:**

Section 1.6 (Estimated Project Costs) includes a table with the costs associated with the project from the North Dakota border to St Cloud. Section 1.4.1 of the DEIS includes the length of the routes from Sauk Centre to St Cloud. The DEIS did not include information regarding the percent of each of the routes that parallel existing right-of-way. This information has been added to the FEIS.

**COMMENT #160    COMMENT SOURCE:    TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

The DEIS lacks specific information pertaining to important north route natural resources such as the St. Wendel Bog complex, Shepard Lake, the Birch Lake State Forest. On a number of occasions the DEIS refers to the St. Wendel Bog in the context of an SNA, or scientific and natural area. Everybody knows this is a very broad and widely based natural resource. The St. Wendel Bog SNA is actually a 170-acre site designated as a scientific natural area that is part of a

much larger St. Wendel Bog complex. The St. Wendel Bog complex itself is over 700 acres and one of the top two sites for biodiversity and contains one of the largest remaining blocks of native vegetation in Stearns County.

**Response:**

As discussed in Section 7.3.2 of the DEIS, the St. Wendel Tamarack Bog SNA is one of the top two sites for Significant Biological Diversity in Stearns County and is part of a large wetland complex, which encompasses one of the largest remaining blocks of native vegetation in the county. This SNA supports the best and largest example of Minerotrophic Tamarack Swamp in central Minnesota. The SNA is approximately one mile west of the Applicant Preferred Route and is not impacted by the alignment. Potential impacts to the other wetland areas in the general vicinity of the SNA would be minimized to the extent practicable and could be subject to USACE, DNR, and WCA permitting requirements.

**COMMENT #161    COMMENT SOURCE:    TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

The St. Wendel Bog complex is a natural resource that has been documented as having local, state and even international importance. In an effort to ensure the integrity and character of this important natural resource is maintained, the St. Wendel Bog should be analyzed and referred to in the DEIS in it's entirety rather than just an SNA. Page 7-36 in the DEIS provides a misleading notation that the St. Wendel SNA is located approximately one mile west of the applicant preferred route and is not impacted by the alignment. This characterization of the St. Wendel Bog complex is irresponsible.

**Response:**

See response to comment 160.

**COMMENT #162    COMMENT SOURCE:    TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

Zoning impacts. Page 7-10 notes effects from either route on planned land uses as identified in future land use plans for each affected jurisdiction would vary. According to the 2003 comprehensive plan for the city of St. Cloud, the preferred route would not affect areas identified as primary growth areas, secondary growth areas, or ultimate service areas. That's a quotation directly from the DEIS. The ATF final report noted the St. Joseph Township ATF member as stating future development area for the city of St. Joseph and Waite Park, land has been identified in the comprehensive plan for development, land has been purchased, and some infrastructure, sewer and water, has been put in place. This must receive clarification and correction as needed.

**Response:**

Existing land uses and structures were considered in the impact analysis. Future land use plans from study area communities were reviewed to determine the potential for future land use conflicts. Section 3.6.2 of the FEIS includes more detailed discussion about Saint Joseph and Waite Park.

**COMMENT #163 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

Undocumented homes impacted by the preferred and alternative A and B routes are missing. There needs to be greater clarification and accuracy regarding the number of homes that will be affected within the 1,000-foot alignment. As I said before, in the NORCA executive summary we identified 112 homes in the preferred route and 120 homes in the alternate A route, yet the DEIS only identifies 83 and 116 respectively.

**Response:**

See response to comment 132.

**COMMENT #164 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

The DEIS should include more specificity pertaining to wetland impacts on the preferred, alternate A and alternate B routes, including Shepard Lake, and further analysis of Shepard Lake's restoration efforts with the United States Fish and Wildlife Service as well Ducks Unlimited. Currently the proposed pole placement is within the 1,000-foot DNR shoreline easement of Shepard Lake, which is a unique ecosystem within Brockway Township. The poles across the periphery of Shepard Lake would, on the part of U.S. Fish and Wildlife and Ducks Unlimited, would flood these poles in over three feet of water.

**Response:**

Approximately 50 feet of the proposed preferred route right-of-way intersects the Shepard Lake PWI boundary. If this route is selected, the Applicant could coordinate with USFWS and Ducks Unlimited to avoid or minimize impacts to proposed habitat restoration or enhancement projects.

**COMMENT #165 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

Clarification includes important cultural and historic resources in the draft environmental impact statement, such as the century farm program, intrusion of the farm's natural character. There's 27 century farms that we've identified within the preferred route and 24 in the alternate A route.

**Response:**

See response to comment 136.

**COMMENT #166 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

We also want to identify center pivot irrigation in the preferred and alternate A and B routes. There's two additional center pivots that have been identified in the preferred and three additional in the alternate A in Brockway Township.

**Response:**

Center pivot irrigation systems were identified using a combination of aerial photography and localized field verification. Mitigations to local impacts, such as the effect of pole placement on irrigation systems can be addressed in negotiations between the utility and the landowner.

**COMMENT #167 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

Pertaining to recreation in the DEIS, the DEIS fails to include reference to alternate A impact on Birch Lake State Forest along County Road 17. Pertaining to impacts on flora, the DEIS on page 7-117 notes, The majority of the applicant-preferred route occurs along existing rights-of-way, including roads, and is also adjacent to cultivated row crops. Given that the vegetation communities that occur in these areas are regularly disturbed, impacts due to construction are not anticipated to substantially disrupt vegetative community quality or function. This statement is wrong, it's misleading, and it's irresponsible given the relatively high impact on the wetlands and rural lands, as well as the MCBS biodiversity. Also, typically, vegetation is controlled either mechanically or with herbicides such as aerial defoliation on a regular maintenance schedule.

**Response:**

Birch Lake State Forest is located one mile north of Route A, therefore no impacts are anticipated. Vegetation is generally not controlled with herbicides; when vegetation control is necessary, it is generally done with mechanical means.

**COMMENT #168 COMMENT SOURCE: TRANSCRIPT****Name: Hylla, Scott****Comment:**

Pertaining to rare unique natural resources or critical habitat, the page 7-131 states, As discussed in previous sections, applicants have routed the applicant preferred route such that the majority is co-located with existing rights-of-way, therefore minimizing additional tree clearing that could increase fragmentation of sensitive habitats. This is false, misleading and irresponsible as the preferred route possesses the highest amount of proliferation of new transmission corridors.

**Response:**

A table comparing the extent to which the routes follow existing right-of-way has been included in the FEIS.

**COMMENT #169 COMMENT SOURCE: TRANSCRIPT****Name: Stich, Carl****Comment:**

St. Wendel Township. The town board objects to this because we already have two lines coming through our township and every time a line comes through our valuations keep going down. And we just feel that another line is just not feasible to come through our township. Pretty soon you won't be able to build a house without being underneath one, because there's lines coming through St. John's, there's one by Fisher Hill, and now where this one is going we don't know yet. What is wrong with the line going around all of this? Wouldn't that make more sense than to try to pull your way through this here? It just doesn't make sense here.

**Response:**

Comment noted.

**COMMENT #170 COMMENT SOURCE: TRANSCRIPT****Name: Check, Terry****Comment:**

I think one of the things I wanted to address is, again, the need for the power line to begin with. You made reference to projections in the future and I think one of the interesting things about the projections is they make the assumption that we should generate more power rather than put in place policies that might consume less energy. I'd like a reference to the specific study that is being used and how I might be able to look that up so that I can look at that more specifically.

**Response:**

See response to comment 150.

**COMMENT #171 COMMENT SOURCE: TRANSCRIPT****Name: Check, Terry****Comment:**

The second question has to do with the type of power that we're getting. The CapX 2020 website does state that they are interested in trying to generate some renewable energy through this, but it seems that the line that they're talking about that does that really goes in southwest Minnesota, and maybe the Xcel Energy person can tell us a little bit more about what percentage of renewable energy would come from the Fargo to St. Cloud line. Otherwise we're just increasing the situation where we're even more dependent on fossil fuels. And I think it would be sad and kind of a tragedy if we're going through prime woodland and some key farmland in order to power people's flat screen televisions.

**Response:**

The environmental review is being conducted under the Minnesota rules for routing of High Voltage Transmission lines in Chapter 7850 of the Minnesota Rules, under the Minnesota Power Plant Siting Act. The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. Evaluation of alternative generation, including distributed generation technologies were discussed in the environmental report for the Certificate of Need, and is beyond the scope of this EIS.

**COMMENT #172 COMMENT SOURCE: TRANSCRIPT****Name: Brazys, Mary****Comment:**

My concern is about the regional line also. If we're looking at a regional line that might end up going down to, I assume, the Chicago area at some point, why are we so concerned about the cost of the underlying underground wires when we have a whole Chicago market that can help us pay for them.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. The estimated capital costs in the DEIS are only for the transmission line. Cost estimating for regional service outside the project limits defined in the DEIS is beyond the scope of this document.

**COMMENT #173 COMMENT SOURCE: TRANSCRIPT****Name: Brazys, Mary****Comment:**

Keep the state of Minnesota and Stearns County looking as pristine and aesthetic and as enjoyable as possible for the citizens up here?

**Response:**

Comment noted.

**COMMENT #174 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

I'm representing No CapX on this particular comment. We were interveners in the certificate of need and that statement was incorrect. There were three claimed purposes, one for the regional reliability, one for load service, the other was not for wind, it was for generation interconnection. And the testimony for the certificate of need was specifically that it was not for wind and that you can't devote transmission to a particular type of generation. And so I want to be sure that the record is clear here that it is not for wind because it is not.

**Response:**

Comment noted.

**COMMENT #175 COMMENT SOURCE: TRANSCRIPT**

**Name: Johnson, Murdoch**

**Comment:**

I didn't see anything about the ongoing impacts of the power line in terms of the vegetation underneath the power line. What happens, you know, whether it's mechanical or a herbicide, you know, what those processes will be, how often they'll be carried out, because I think that's a big part of the environmental impact of the line.

**Response:**

Potential impacts to flora are discussed in Sections 5.9.2, 6.9.2, 7.9.2 of the DEIS. Permanent vegetative changes would take place within the right-of-way (150 feet). Trees and shrubs that may interfere with maintenance and the safe operation of the transmission line would not be allowed to establish within the right-of-way. Typically, vegetation is controlled mechanically a regular maintenance schedule; herbicides are not commonly used. Vegetation that does not interfere with the safe operation of the transmission line is allowed to reestablish within the right-of-way after construction. Vegetation control can be negotiated with the property owner when the final easement agreement is obtained.

**COMMENT #176 COMMENT SOURCE: TRANSCRIPT**

**Name: Kenning, Joe**

**Comment:**

It took us 30 years to catch on that we had an electrical problem. And it's very hard to see and feel. You don't feel it and you don't see it, but when we did, we started moving animals away from the line, farther away, and that's when we found out, like hogs, we had them close by the

line there, that changed everything. But we moved them way away from the line and it was just day and night difference on these animals. And my mother, she raised hatching eggs before that and she got top hatchability and got her name in the paper, her picture in the paper. But when they put that 115,000 volt line through there she said I'm all done, they died, you can't do nothing. You know, that year we put the chickens underneath that transmission line, and my mother butchered them chickens and then threw them away because the intestines were all twisted up.

**Response:**

Comment noted.

**COMMENT #177 COMMENT SOURCE: TRANSCRIPT**

**Name: Kenning, Joe**

**Comment:**

We put a wire underneath, two insulators underneath that line, it was about this high off the ground, and the insulators hung down into it and the alfalfa grew up in there and it just burned the tops of the alfalfa right off under the wires between two insulators.

**Response:**

Stray voltage is discussed in Sections 5.2, 6.2 and 7.2 of the DEIS. There could be some induced current resulting from the placing the transmission line near an electric fence. It is anticipated that the current would be in a very low voltage and the fences would need to be grounded.

**COMMENT #178 COMMENT SOURCE: TRANSCRIPT**

**Name: Kenning, Joe**

**Comment:**

I got the line moved back in, what was it, '84, and I was really surprised the improvement when that line was moved. My father, just as their line gets used and the amperage goes up on it and the problems get worse. My dad had his knees x-rayed and there was bone on bone. He was in the house over two years and he couldn't walk. And when he wanted to use his tractor we had to get a four-wheeler alongside so he could drive it to the house and he couldn't do nothing. And it was bone on bone on them knee joints. 30 days after that transmission line was pulled, dad hung up the cane and now his knees rehealed.

**Response:**

Comment noted.

**COMMENT #179 COMMENT SOURCE: TRANSCRIPT****Name: Kenning, Joe****Comment:**

Colorado State University did some research on it. And the magnetic field does tie the calcium up and that is why the knees would not heal. And there's so much of this going on. And we got wires and put in ground stakes that are about 2,000 feet apart and I put them in there. When I put them in there our cows' milk production come up at 1,000 pounds every pickup. For a number of times they just kept crawling up just by putting in these ground stakes. And the line would move, actually that line was inducing the magnetic fields in the ground, because I'm running meters on them, and I'm running between one and two hundred milliamps of current on these ground wires.

**Response:**

Comment noted.

**COMMENT #180 COMMENT SOURCE: TRANSCRIPT****Name: Kenning, Joe****Comment:**

Is it coming off this transmission line? Is this new line going into the field and the ground too, ground current, and they were the ones that caused the trouble. You people all go out here with stray voltage. I'm angry when you talk about stray voltage, because them birds, that 115,000 volt line when that was put in, in 1950, it was not used very heavy. And birds would sit on them live wires from pole to pole and all the birds would fly off, it scared them, and it was actually that amperage through that line, and so today them birds won't even go near that line.

**Response:**

Stray Voltage is discussed in Sections 5.2, 6.2, and 7.2 of the Draft EIS.

**COMMENT #181 COMMENT SOURCE: TRANSCRIPT****Name: Kenning, Joe****Comment:**

It's our job to protect these animals and our human beings from the electrical field in the ground, why are they using the earth to return, why are they putting this static wire out there and looking at the ground that's inducing these currents in the ground? And they should be running a nonground system and if they want a safety system that should not be a current carrying system, ground current.

**Response:**

See response to comment 180.

**COMMENT #182 COMMENT SOURCE: TRANSCRIPT****Name: Kenning, Joe****Comment:**

In my neighborhood there's all kinds of pacemakers put in people in my area. There's something wrong. And St. Cloud Hospital told me I never had a heart attack and I do not have no blockage, but my heart was stopping. What makes your heart work is electrical shock from your body and that's what makes the muscles work and there was too much interference with my electrical system. Okay, that's in here, it is only a volt and a half and that's guaranteed to run my heart for five years at 100 percent use. You can look at that. It sure don't take much current to alter your nervous system.

**Response:**

Potential impacts to medical devices are discussed in Sections 5.2, 6.2 and 7.2

**COMMENT #183 COMMENT SOURCE: TRANSCRIPT****Name: Heim, Kevin****Comment:**

I was curious about the green route. Why is it so wide in this area? Can they not decide?

**Response:**

Permit applicants often include wide spots in routes which provides the ability to move within route to avoid or minimize impacts. Minnesota Rules allow the applicant include route widths of up to 1.25 miles if needed. The width of the route can be narrowed through the hearing and permitting processes.

**COMMENT #184 COMMENT SOURCE: TRANSCRIPT****Name: Vouk, Ray****Comment:**

Why is it that wide to not just go all the way through, and then how wide is it? How many feet is there a mile or section or whatever? But you're getting closer now to your decision, so why hasn't there been anything changed on the width of that? I mean, somebody has to know something about that.

**Response:**

The final alignment has not been selected at this time. Ultimately, the route permit will establish a single route, generally 1000 feet in width, but may include tighter restrictions in certain areas depending on resources and potential impacts.

**COMMENT #185 COMMENT SOURCE: TRANSCRIPT****Name: O'Neil, Tara****Comment:**

I walked in tonight to find out that the preferred route alternate 1 would be heading right through my backyard. And they don't even have it marked right. They have my house just a building, so I need to find out how to have the house counted.

**Response:**

The details of final alignment have not been developed yet, multiple alignments are under consideration, once the route is approved the project will go through a phase of final design and property acquisition. Potential mitigation for impacts to residential properties includes avoidance. The Applicant chooses not to allow residential property to be located within the proposed ROW of the transmission line or 75 feet on either side of the transmission line centerline. The Applicant identified both assumed residential and non-residential structures (barns, sheds, detached garages, etc.) as discrete data points to the extent possible based on field reconnaissance via publicly accessible roads and aerial imagery interpretation. OES reviewed the information provided by the Applicant. It is possible structures may not have been accounted for if there was not a clear view of them from publicly accessible roads due to distance or other obstructions such as existing vegetation, or they were not discernable based on aerial imagery interpretation.

**COMMENT #186 COMMENT SOURCE: TRANSCRIPT****Name: O'Neil, Tara****Comment:**

Going down that railroad track, that railroad track is used by many people. I see people walking dogs and I use that myself as kind of a nature path to get out and walk. The railroad is used by Cold Spring Granite occasionally, not real often. They did have thoughts of using that railroad track as a bike path to go out to Cold Spring, it hooks onto the Wobegon Trail, I'd much rather see a nice bike path rather than the power lines.

**Response:**

A transmission line would not preclude trail development but could create visual impacts. Impacts on recreations resources and visual resources are discussed in Section 7.3.2 and potential mitigation is discussed in Section 7.3.3.

**COMMENT #187 COMMENT SOURCE: TRANSCRIPT****Name: O'Neil, Tara****Comment:**

Along with having to take out a whole bunch of trees back there, going through some wetland area back there. And I can't touch the wetland area on my property but somehow these guys can come through and have no problems doing that. There's deer, red fox back there. I mean, I can go on and on like everybody else can about the environmental impacts. I mean, anywhere they go there's environmental impact. But it is kind of nice seeing the wildlife back there. And no, I don't want it in my backyard. So I would want it to go somewhere else besides the preferred route 1, I believe it is, down the railroad tracks.

**Response:**

The final alignment has not been selected at this time. The purpose of the EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. Water resources, such as wetlands are discussed in Sections 5.8, 6.8, and 7.8 of the DEIS. Natural Land Resources, including flora and fauna are discussed in Sections 5.9, 6.9, and 7.9 of the DEIS.

**COMMENT #188 COMMENT SOURCE: TRANSCRIPT****Name: Boatz, Margaret****Comment:**

I'm thinking about the statements that were given by Scott about the green route, the comments that were made by Carl about the brown route, and we haven't really heard about why the brown route is shorter so the cost of that might be less. I don't know that myself, but I would suspect so. And that the environmental impact might be less, according to Scott's comments. It just seems like there's a lot of questions that I have about hearing more about this, and maybe reading the very long document is what's expected, but it seems like maybe the power company could address some of these questions and the common sense of the whole thing, and sort of just get down to brass tacks about this and tell us a little more clearly about that common sense piece.

**Response:**

An impact summary is provided at the beginning of the Draft EIS.

**COMMENT #189 COMMENT SOURCE: TRANSCRIPT**

**Name: Widder, Don**

**Comment:**

I was involved years ago with this Wobegon Trail and I was under the understanding at that time that they were talking about saving that for uses like this and other things. And I was just wondering if that was considered.

**Response:**

Portions of Route D and the Applicant Preferred Route parallel the Lake Wobegon Trail; this is noted in the DEIS.

**COMMENT #190 COMMENT SOURCE: TRANSCRIPT**

**Name: Widder, Don**

**Comment:**

What is the setback that you have from a residence? What's the closest that line can be? And is it quite a bit different for, let's say a farm barn where animals are in, or before you mentioned blatners (phonetic), how close could you come with that?

**Response:**

See response to comment 13.

**COMMENT #191 COMMENT SOURCE: TRANSCRIPT**

**Name: Schmitt, Brent**

**Comment:**

And the question that I'm wondering about is can you help us a little bit with what's the Buy the Farm rule?

**Response:**

See Minnesota Statute 216E.12, subdivision 4 Eminent Domain Powers; Power of Condemnation.

**COMMENT #192 COMMENT SOURCE: TRANSCRIPT**

**Name: Fuchs, Virgil**

**Comment:**

We have a high incidence of MS in our area. My brother's wife developed MS. We had a good friend, Berenger (phonetic), and if you recall he killed himself. He had MS and he crawled from that house to the barn and he developed that after the power line was there. He lived about 800 feet from the power line. And he was a very good friend of mine. He was. What I don't like

about this situation is that he also murdered his wife, and that, I don't forgive him for that 'cause she had nothing to do with the problems there.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #193 COMMENT SOURCE: TRANSCRIPT**

**Name: Fuchs, Virgil**

**Comment:**

It also tells you that if you've got an electrical fence, you need to ground that fence with steel fence posts or you will get a shock a half mile from it. 'Cause this line -- in our case it's a DC line. Some would say why am I talking to you guys here, that's a different power line. Okay. I intend to present 1,100 pages of testimony that was presented in our case by the state of Minnesota power companies, and in that testimony they told us, you guys should really be happy, you're getting a DC line. If you were getting an AC line you should be here complaining.

**Response:**

Comment noted.

**COMMENT #194 COMMENT SOURCE: TRANSCRIPT**

**Name: Fuchs, Virgil**

**Comment:**

Now, my suggestion is that you go for monthly payments on the towers. I've got friends that have cell phone towers on their land and they're getting \$500 a month for a cell phone tower and they're not getting anything out of it, where you're going to have -- you can share in the profits that they're going to try and make off from your land. So I suggest that everybody start writing your legislators and go for the \$500 or \$1,000 a month payment on these towers because you don't have to have that on your land for free. If there was a price paid for these towers there'd be a line from here to I-94 wanting the line and it wouldn't have to be on your land.

**Response:**

Comment noted.

**COMMENT #195 COMMENT SOURCE: TRANSCRIPT**

**Name: Fuchs, Virgil**

**Comment:**

And in a lot of cases people have passed away from cancer, cancer is really high along the line. I can bring you to houses that are empty, farm places that are empty. But I can go on a for a long, long time. If you want to set up a meeting I can bring a number of experts in from across the

United States to attend the meeting and answer some of these questions that you're not going to get here tonight.

**Response:**

Comment noted.

**COMMENT #196 COMMENT SOURCE: TRANSCRIPT**

**Name: O'Neil, Tara**

**Comment:**

I just have one question. That proposed route that they're looking at going through with the railroad track, my house is level and close to that railroad track. Then on the other side of that railroad track the land goes up on a small hill and there's a line of houses up there. Does anybody know anything about, as far as the power line, am I in a safer spot or up higher are they in a safer spot? Does it matter, high or low?

**Response:**

The electric and magnetic fields are determined by the location of ground or object in relationship to the energized conductors and are proportional to that distance from the source. The field strengths diminish with distance away, the further the distance from the energized conductors the lower the electric and magnetic field strengths. Minnesota has a 8 kilovolt/meter safety standard for electric fields and do not have any safety requirements for magnetic fields. It is important to note; the electric field requirement is due to induction on large objects because of the 5 milliamp rule in the National Electrical Safety Code (NESC). Higher or lower doesn't matter, it is determined by the distance to the source.

**COMMENT #197 COMMENT SOURCE: TRANSCRIPT**

**Name: Theisen, Jerry**

**Comment:**

Someone else brought up the question for the need for the line. I'm in the business of energy management and demand is going down steady. So how do you explain that? Commercially and residentially it's going down a lot. I think we need to address that.

**Response:**

See response to comment 150.

**COMMENT #198 COMMENT SOURCE: TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

One thing I'd like to have some questions on is why isn't some of the leading experts on EMF here? We heard wonderful experts like Dr. David Carpenter, who is a Harvard researcher on

EMF, and I read some of his literature and he's stating that no one should live within 1,000 feet of these 175-foot towers. And so as I was looking at the environmental impact statement you've done for other routes and you go through and you put a comment on there like, according to the state study five, six, seven years ago, but why aren't we using the latest studies of people like Dr. David Carpenter? Why isn't he part of the calculus of EMF?

**Response:**

The analysis of EMF impacts in the EIS does not focus on the results of any one researcher, but looks at the general consensus of the body of research conducted to date.

**COMMENT #199 COMMENT SOURCE: TRANSCRIPT**

**Name: Ebaugh, Dave**

**Comment:**

You allow these poles to be 75 feet from a home, they're 175-foot tall, the home administration doesn't even permit loans because they're within the fall range, so can you address some of those issues of why, you know, common sense, if we're worried about fires and hazards and so forth, how can you go 75 feet on something 175-foot tall?

**Response:**

All transmission line structures and the conductor systems that they support are designed to withstand the transverse, longitudinal, and vertical loads imposed on them by statistical meteorological conditions. Structures are designed to meet the NESC loading requirements and/or other load requirements that exceed the NESC. In most cases, if the line were to fail it would be in the longitudinal or vertical direction within the right-of-way due to the wires/conductors being connected to each structure. Transverse failures which fail toward the edge of the right of way rarely occur and if they do it is usually caused from a unpredictable natural event such as a microburst, tornado, or other extreme wind occurrence. These extreme events are unpredictable and hard to design to because the impacts and effects of them are unknown.

**COMMENT #200 COMMENT SOURCE: TRANSCRIPT**

**Name: O'Neil, Tara**

**Comment:**

That wind energy has to be so far away from my house so that if it falls, and it even has to be so far away from my barn, it can't fall on any building, whether it's dilapidated or being lived in. And so a question also is will those lines affect the wind energy in any way, the function of that, so that I don't get my wind energy?

**Response:**

While there are no legally defined distance standards between residential properties and transmission lines or towers, the Applicant chooses not to allow residential property to be

located within the proposed ROW of the transmission line or 75 feet on either side of the transmission line centerline. Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on individual properties can be addressed in negotiations between the utility and the landowner. However, there would be no anticipated effect from transmission lines and towers on wind energy.

**COMMENT #201 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

I have a couple of issues. One is related to Virgil's question and comments about the particulate matter, and I don't see anything in here about the Henshaw effect, which is particles that are ionized and stick to your lungs more than they ordinarily would, and that happens if you have dust near a power line. Is that addressed in here?

**Response:**

Scientific literature clearly evidences that substantial research has been, and continues to be, conducted by academic laboratories, as well as the most qualified health research organizations in the world, including NIEHS (within the National Institutes of Health) and the WHO, into the potential health risks from EMF exposure. In spite of these efforts, there are no established health criteria or quantifiable impact assessment methods currently accepted for determining adverse effects to human health with respect to EMF exposure or the Henshaw Effect. In a very recent publication, the New Zealand National Radiation Laboratory (NZNRL, 2008) concluded: "In spite of all the studies that have been carried out over the past thirty years there is still no persuasive evidence that the [EMF] fields pose any health risks. The results obtained show that if there are any risks, they must be very small."

**COMMENT #202 COMMENT SOURCE: TRANSCRIPT**

**Name: Overland, Carol**

**Comment:**

Number two regarding causing fires. I have a copy of an EPRI report that addresses what happens when a shield wire or fiber-optic does a ground fault on a 345 line against that shield wire and the current can travel through that into people's homes causing, according to the report, fires and -- let's see, fires and injury to people. Have you addressed that in here anywhere? Because there is going to be fiber-optics on the top, have you addressed the impacts and safety issues there?

**Response:**

When there are no under built distribution lines on the transmission line, such as the case for this project, the transmission line is isolated from the distribution neutrals/grounds, therefore fiber optic cables shouldn't transfer currents into homes.

**COMMENT #203 COMMENT SOURCE: TRANSCRIPT****Name: Overland, Carol****Comment:**

This compliance report says transmission studies indicate that once the entire length of the Fargo/Monticello line is in service the flow on the lines could be as high as 600 MVA. This additional rating should be integrated into the electric system, particularly in the facilities in North Dakota, South Dakota, Manitoba, and the Fargo-Monticello line which could experience current flow with associated power levels as high as 1,200 to 1,500 MVA. It is expected that these conditions will occur during periods when the transmission lines are out of service. Now, if you look at 1,500 MVA, that's 75 percent of the thermal limit loading of 2,050 MVA. So if you look at that 75 percent level, that's one of the levels we need to see, EMF levels calculated for the intervals going out to where they get down to the two to four milligauss level attached to the line to be at that level, so that we can have some idea where they're safe. Because over and over the testimony in these proceedings has been that there is no safe -- the utilities will not say that it is safe at any point, so they won't commit to that, and I've been to the appellate court and they don't -- the appellant court would say they weren't providing safe power. So that's something we have to look at, how far we have to be away from that line to be safe. The further away you are the better, but how far before it gets to those levels.

**Response:**

See response to comment 33.

**COMMENT #204 COMMENT SOURCE: TRANSCRIPT****Name: Heim, Kevin****Comment:**

Has the power company published the price of the different lines? Because I'm assuming the green one is the cheapest.

**Response:**

Estimated cost are summarized in Table 1.6-1 of the DEIS in 2009 dollars. Final costs will depend on the final route permitted and the final alignment developed.

**COMMENT #205 COMMENT SOURCE: TRANSCRIPT****Name: Heim, Kevin****Comment:**

How did the power company come up with that as their primary choice?

**Response:**

According to the permit application submitted to the state over 750 corridors were evaluated through the route development and selection process. The removal of route alternatives from

consideration were based on the proposed routes ability to parallel existing linear features and the potential for minimizing impacts to existing residences and agricultural uses. In addition, the state added 12 route options that were suggested through public comments submitted during the scoping process.

**COMMENT #206 COMMENT SOURCE: TRANSCRIPT**

**Name: Vouk, Ray**

**Comment:**

How far out does that arm stick off the pole? If the base has to be 75 feet from a building, how far is that arm out?

**Response:**

Davit arms extend approximately 18 feet from the pole. Refer to Diagram 1 1. Double Circuit 345 kV Structure with ROW in the Draft EIS.

**COMMENT #207 COMMENT SOURCE: TRANSCRIPT**

**Name: Vouk, Ray**

**Comment:**

State law is you can't go over a rest area and I would like to know why. There's nobody living there 'cause if they're there more than 12 hours they're dead anyways. Why can't they be over a rest area?

**Response:**

The regulation, 23 CFR §645.209(h), provides: Scenic areas. New utility installations, including those needed for highway purposes, such as for highway lighting or to serve a weigh station, rest area or recreation area, are not permitted on highway right-of-way or other lands which are acquired or improved with Federal-aid or direct Federal highway funds and are located within or adjacent to areas of scenic enhancement and natural beauty. Such areas include public park and recreational lands, wildlife and waterfowl refuges, historic sites as described in 23U.S.C. 138, scenic strips, overlooks, rest areas and landscaped areas. The State transportation department may permit exceptions provided the following Conditions are met: (1) New underground or aerial installations may be permitted only when they do not require extensive removal or alteration of trees or terrain features visible to the highway user or impair the aesthetic quality of the lands being traversed. (2) Aerial installations may be permitted only when: (i) Other locations are not available or are unusually difficult and costly, or are less desirable from the standpoint of aesthetic quality, (ii) Placement underground is not technically feasible or is unreasonably costly, and (iii) The proposed installation will be made at a location, and will employ suitable designs and materials, which give the greatest weight to the aesthetic qualities of the area being traversed. Suitable designs include, but are not limited to, self-supporting armless, single-pole construction with vertical configuration of conductors and cable. (3) For new utility installations within freeways, the provisions of paragraph (c) of this section must also be satisfied.

**COMMENT #208 COMMENT SOURCE: TRANSCRIPT****Name: Theisen, Jerry****Comment:**

Just going back to the demand thing and the growth, and someone mentioned it before, that this was all designed and brought up obviously prior to 2009, the need was determined for this when everything was booming and whatnot and obviously that's not happening now. If I was you trying to sell me a power line, I think I would have some sort of chart indicating the need for it. Where is that? Why isn't that here? Why isn't there something saying this is why we need to do it? Like I said, I'm in the business of commercial energy management. The trend is definitely going down. And roughly 20 percent of equipment has been replaced in the world market that should, you know, as far as with energy efficiency choices, so we got a ways to go. Our demand is going to continue to go down. Sure, our growth is going up, but demand is still going down. So where is the chart that shows me that we need this?

**Response:**

See response to comment 150.

**COMMENT #209 COMMENT SOURCE: TRANSCRIPT****Name: Ethen, Tom****Comment:**

I'd like to know, if there is an easement that can contain up to 98 percent of one of these routes, if that is the case why would the state not require that existing easement to be used? understand. They indicated that there is a route, one of the routes could carry -- that 98 percent of that route can hold -- there's an existing easement for this specific purpose; is that correct?

**Response:**

Minnesota Rule 7849.5220 requires that the permit application include where possible existing infrastructure such as transmission lines, railroads and roadways that the proposed transmission line can parallel. The DEIS included these areas in the analysis of the proposed routes. Refer to Table 3.2-2, Table 3.2-3, and Table 3.2-4 in the FEIS for a presentation of corridor sharing with roadways, transmission lines, railroads etc.

**COMMENT #210 COMMENT SOURCE: TRANSCRIPT****Name: Ethen, Tom****Comment:**

If the easement was put in place several years ago, then if these houses and other things came up around that area, they should be well aware of the easement, correct? At the time these areas were developed, because that easement was in place years ago, that would have been public knowledge that that easement was there, correct? So that should have been known by those people that they're taking a risk, correct?

**Response:**

Comment noted.

**COMMENT #211 COMMENT SOURCE: TRANSCRIPT**

**Name: Boatz, Margaret**

**Comment:**

Since that concern is coming up a number of times about is this power line really needed at this particular time in our energy use, when it's declining, what's the process for having that re-addressed? Do you take that information back to the group that did that since this doesn't seem to be your area? How does that -- if we were saying we want that to go back to that group to be revisited and new information used of our current 2011 coming up, you know, at the end of this -- or 2010, whichever, how does that happen? Can you do that? Can you take that back?

**Response:**

See response to comment 150.

**COMMENT #212 COMMENT SOURCE: TRANSCRIPT**

**Name: Hylla, Scott**

**Comment:**

Can you address the issue of Minnesota's Renewable Energy Standards, what they are, and do they have anything to do with the certificate of need for these powerlines? I know we're kind of going back to the wind issue, but if we can just get some clarification on that that would be very much appreciated. Specifically, what Minnesota's Renewable Energy Standards( Minn. Stat 216C.41) are?

**Response:**

See response to comment 150.

**COMMENT #213 COMMENT SOURCE: LETTER**

**Name: Austingtraut, Jodi**

**Comment:**

City of Avon is very concerned about the displacement of residents as well as business along the I-94 corridor in Avon. Blatner Energy, Columbia Gear, etc. are our top employers and tax payers in Avon. The economic impact of placing the line along I-94 in Avon would be detrimental to our local economy as well as our residents.

**Response:**

The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The applicant will work with property owners to develop mitigation measures for impacts.

**COMMENT #214 COMMENT SOURCE: LETTER****Name: Austingtraut, Jodi****Comment:**

There is much concern by residents in regards to EMF impacts. There are families along I-94/Avon impact area whose children have autism and are at even higher risk of effects of EMF.

**Response:**

Public Health and Safety in the vicinity of Avon is discussed in Section 7.2 of the Draft EIS. The Applicant and the state have reviewed potential health impacts from the transmission line, including a request by the state to look at higher operating amperages that could occur in the future. The result of the analysis indicate that electric and magnetic fields will be less than the maximum standards established in other states, and below standards in other countries.

**COMMENT #215 COMMENT SOURCE: LETTER****Name: Bailey, Jane****Comment:**

I have attended every meeting and we have said we do not need it on our land when the Wobegon Trail is right next to our property. You can save money by putting it on the trail as that is state land.

**Response:**

Portions of Route D and the Applicant Preferred Route parallel the Lake Wobegon Trail. This is discussed in the DEIS.

**COMMENT #216 COMMENT SOURCE: LETTER****Name: Bailey, Jane****Comment:**

The other reason to put it on the fence line or the trail, farmers buy bigger equipment so they can farm more efficiently if you put the pole in the files it is harder to farm around between a pole and the fence that is on our property. I have a center pivot on our farm and also our farm has drainage tile throughout our whole farm and so a pole could cut our tile lines.

**Response:**

Center pivot irrigation systems are being considered in the route selection process and the determination of a final alignment; these systems have been identified in the EIS. Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on irrigation systems can be addressed in negotiations between the utility and the landowner.

**COMMENT #217 COMMENT SOURCE: LETTER**

**Name: Bloch, Gary**

**Comment:**

Run line next to I-94, keep out of agriculture areas as much as possible, run underground through cities.

**Response:**

Comment noted.

**COMMENT #218 COMMENT SOURCE: LETTER**

**Name: Stumpf Bolin, Judith**

**Comment:**

Naturally I am concerned about many things. It's never easy to give up property and I would think the shortest and easiest route would be along I-94.

**Response:**

Comment noted.

**COMMENT #219 COMMENT SOURCE: LETTER**

**Name: Borgerding, Cliff**

**Comment:**

Map sheet 69 T125 R32 Section 3 gas pipeline not accurately displayed, runs further south and more east-west in direction.

**Response:**

The pipeline data we have is meant for a general analysis of potential impacts, and does not represent precise (survey-grade) locations.

**COMMENT #220 COMMENT SOURCE: PETITION**

**Name: Cichosz, Jerome**

**Comment:**

We the undersigned wish to express our concerns about the routing location for the CapX Power Transmission line as it passes Fergus Falls. We recommend that the transmission line be located in the optional Alternate Route A, away from the many habited areas of our cities and small towns that border Interstate 94. It might also be routed out west of the airport if scenic byway interests prevail. At a minimum, if the line is routed along I-94 it should be located immediately adjacent to I-94 as it passes Fergus Falls. This latter route would keep vehicle and electrical power transportation within a single compact corridor with minimal invasion to farms

and residential communities. Attached are the 68 signatures and 42 homes located in the existing River Oaks Development.

**Response:**

Comment noted.

**COMMENT #221 COMMENT SOURCE: PETITION**

**Name: Cichosz, Jerome**

**Comment:**

This is a prime housing area that is close to the city of Fergus Falls and has scenic views of the Otter Tail river and valley.

**Response:**

Comment noted.

**COMMENT #222 COMMENT SOURCE: PETITION**

**Name: Cichosz, Jerome**

**Comment:**

It impedes the growth and development potential for either River Oaks or the city of Fergus Falls.

**Response:**

Comment noted.

**COMMENT #223 COMMENT SOURCE: PETITION**

**Name: Cichosz, Jerome**

**Comment:**

It would affect and lower the taxable market value in this area. Our home real estate property values would be lowered. Numerous families have invested in the homes of this area, before any transmission lines existed. In cases, families would suffer losses on their home real estate investment.

**Response:**

See response to comment 28.

**COMMENT #224 COMMENT SOURCE: PETITION**

**Name: Cichosz, Jerome**

**Comment:**

We are concerned about electromagnetic field effects (health and otherwise) in proximity of our homes.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #225 COMMENT SOURCE: LETTER**

**Name: Sand, Dennis**

**Comment:**

The City and Wells Concrete strongly object to Route E, if the Route were to be located directly adjacent to Wells Concrete's property along the southern border of the City limit. However, if the location of the route was moved further south to accommodate Wells Concrete future expansion, the City and the Company would not object to Route E.

**Response:**

See response to comment 121.

**COMMENT #226 COMMENT SOURCE: LETTER**

**Name: Sand, Dennis**

**Comment:**

Route - D - There are a number of residences and commercial businesses, and the 18-hole Albany Golf Course, that are adjacent to Interstate 94 on the north side, and there are several commercial businesses including Albany Chrysler Center and an industrial park on the south side of the Interstate. If the line was located along Route D above ground it would have a dramatic and devastating negative impact on the residences and the commercial businesses, and it would in effect destroy the Albany Golf Course, regardless of which side of the Interstate it was located on.

**Response:**

Comment noted.

**COMMENT #227 COMMENT SOURCE: LETTER**

**Name: Sand, Dennis**

**Comment:**

On page 7-10 under the Land Use and Zoning section, there is a reference to Route E option which states the "only agricultural land is affected." Clearly that would not be the case if Route E was located adjacent to the City limits and Wells Concrete.

**Response:**

The statement on page 7-10 is in reference to the table on page 7-11. Table 7.1-10 Route Option Evaluation for Land use is representing a comparison of the Route options and equal portions of the Applicant Preferred Route. In the Option 12 area Route E has only agriculture land impacts.

**COMMENT #228 COMMENT SOURCE: LETTER****Name: Sand, Dennis****Comment:**

On page 7-12 under the Land Use Zoning section, there is a statement pertaining to "undergrounding" versus "above ground" options for portions of Route D, that "both the undergrounding and above ground options would prohibit any developed land uses within the easement...". This statement implies that there is sufficient area between the City of Albany residences, commercial business and the Golf Course adjacent to I-94 to locate either the 60 foot underground ROW or the 150 foot above ground ROW without affecting existing land uses. There is not.

**Response:**

The intent of the statement on page 7-12 was to explain that agricultural land uses could occur in the right-of-way if the above ground transmission line is selected in this area. If the underground option is selected, however, the land use would be limited to non woody vegetation.

**COMMENT #229 COMMENT SOURCE: LETTER****Name: Sand, Dennis****Comment:**

On Table 7.3-2 on page 7-36, there is an indication that there are "0" acres of recreational land that would be located within the ROW for the Route D above ground option. That is not correct because the Albany Golf Course would be within that ROW, if the line was located north of I-94. The Albany Golf Course is recreational land that has been in existence 50 years.

**Response:**

The current proposed right-of-way goes south of I-94 at this location and does not impact the golf course. To completely remove the golf course as a potential impact, it would need to be removed from the route. In addition, the golf course is zoned as commercial land, so it wouldn't be considered recreation land using the data source of this table.

**COMMENT #230 COMMENT SOURCE: LETTER****Name: Sand, Dennis****Comment:**

On page 7-44, in the middle of the page there is a statement that "Route D travels through Richmond where a chain of 14 lakes provides recreational opportunities..." That statement should reference Route F instead of Route D.

**Response:**

The text has been corrected and is included in the FEIS.

**COMMENT #231 COMMENT SOURCE: LETTER****Name: Sand, Dennis****Comment:**

On page 7-49, in the section regarding mitigation of aesthetic impacts on recreational issues, there is the statement that "no impacts on recreational uses that would alter or limit the use of these areas are anticipated, therefore, no mitigation measures are proposed." Clearly, with regard to Route D and the Golf Course in the City of Albany, that Route would have significant negative aesthetic impact on the Golf Course. It would likely put the Golf Course out of business.

**Response:**

The current proposed right-of-way goes south of I-94 at this location and does not impact the golf course. The structures, if placed south of I-94, will probably be visible from some locations on the golf course.

**COMMENT #232 COMMENT SOURCE: LETTER****Name: Daubek, Victor & Alice****Comment:**

We lived on a farm with stray voltage. It was impossible to maintain a healthy herd. We finally gave up and walked away. After that our farm was completely torn down except for the machine shed. If there wasn't a problem why wasn't the farm sold as was. During this time I went to numerous meetings on stray voltage and other farms had voltage problems, left the farm and the farm sites were destroyed.

**Response:**

Transmission lines would only have an effect on the stray voltage from distribution connections to farm buildings if the transmission line is parallel to and above those distribution lines. The final transmission line alignment would be developed to avoid this situation to the extent practicable.

**COMMENT #233 COMMENT SOURCE: LETTER****Name: Daubek, Victor & Alice****Comment:**

Our sons farm (Big Ten) on Cty 11, raising the heifers for their dairy operation. If they can no longer raise heifers (200 head) there it will affect two livelihoods.

**Response:**

See response to comment 68.

**COMMENT #234 COMMENT SOURCE: LETTER**

**Name: Daubek, Victor & Alice**

**Comment:**

The maps sent out by CapX 2020 are not the same and made so no one can understand exactly where the routes are going. Cty 11 & 12 shown as routes on the maps at your meetings in Albany Sept 29th are not in the corridor as I see it. If a route permit is granted, why can it change?

**Response:**

Refer to Appendix H of the Draft EIS for Detailed Route Maps. Section 2.3 of the DEIS describes the environmental review process.

**COMMENT #235 COMMENT SOURCE: LETTER**

**Name: Daubek, Victor & Alice**

**Comment:**

Also, on the internet I read their voltage usage is down 15% and the need was pushed through, meetings were held before emails were sent out and information was outdated.

**Response:**

See response to comment 150.

**COMMENT #236 COMMENT SOURCE: LETTER**

**Name: Eastlund, Brian & Joan**

**Comment:**

There is an existing power line on the property on the north side of I-94. Is there a reason why the line cannot be placed near this existing line?

**Response:**

The North side of Interstate 94 is included in the route and is still under consideration as a possible alignment.

**COMMENT #237 COMMENT SOURCE: LETTER**

**Name: Eastlund, Brian & Joan**

**Comment:**

There are several homes, a small creek and a large stand of trees on the south side of I-94. Therefore is it possible to place the line where there are already cleared fields? We feel the tree area is worth so much more to us as we are a Century Farm and the trees were placed and cared for by our family from the start.

**Response:**

Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. Consideration could be made to preserve the natural landscape; construction and operation could be conducted to prevent unnecessary destruction, scarring, or defacing of the landscape in the vicinity of the project.

**COMMENT #238 COMMENT SOURCE: LETTER**

**Name:** Farry, Joe

**Comment:**

My comments are limited to map designated in Appendix H as Sheet 79, which covers the section of proposed routes B, C and D in the vicinity of the intersection of Hwy 75 and I-94 near the interstate exit 156 (St. John's Abbey/University). I am providing the street (mailing) addresses of individuals living within the area described on Map 79 whose homes were not identified on that map. As far as I know, these households were not mailed the brochure last spring describing the 8 (or is it 9?) proposed alternative routes. Over the past two weeks I have only been able to reach three of these property owners. Needless to say they were stunned and outraged that they were "overlooked". I am frustrated by the failure of the OES and/or the consulting engineering firm to carry out the (elementary) task of compiling accurate property ownership data as the foundation for this EIS analysis.

**Response:**

See response to comment 132. Property ownership data was provided by the Utility.

**COMMENT #239 COMMENT SOURCE: LETTER**

**Name:** Farry, Joe

**Comment:**

The map used in the EIS is also in error by identifying the vacated former entrance to St. John's on the south side of I-94 as "Old Collegeville Road". An earlier version of Google Maps contained the same error. Was the consulting firm hired by OES using an outdated Google map to conduct an EIS analysis?

**Response:**

The data used for the DEIS was obtained from Minnesota Department of Transportation.

**COMMENT #240 COMMENT SOURCE: LETTER**

**Name:** Farry, Joe

**Comment:**

Sheet 79 - The property of the Order of St. Benedict Inc. (St. John's Abbey) has been classified as a Game Refuge for 70 years. The "game refuge" applies to property both north and south of I-94. Private property owners who purchased land for home sites from St. John's regulate their

property in conformity with the conditions characteristic of a game refuge - including allowing deer to eat their tulips!

**Response:**

Comment noted.

**COMMENT #241 COMMENT SOURCE: LETTER**

**Name: Farry, Joe**

**Comment:**

The town site for Collegeville was platted in 1879, the same year that a post office and a railroad station were established. The railroad tracks have been replaced with the Wobegon Bike Trail, and a historical marker along the trail commemorates the history of the location. There are two Century Farms in the neighborhood and three homes that have been occupied for 100 years. Route "D" cuts right through the community, while Route "C" affects the southern section. At least one property owner along Collegeville Road is subject to "double jeopardy." that is, if either Route "C" or "D" is implemented, he loses land to the power line ROW.

**Response:**

Comment noted.

**COMMENT #242 COMMENT SOURCE: LETTER**

**Name: Farry, Joe**

**Comment:**

If Route "C" is selected, it will cross Hwy 75 and create a ROW on the Donnabauer Century Farm and the Haeg Farm. Several streams and springs are located in these areas which provide run-off routes for water from Hwy 75 and I-94.

**Response:**

At the time of route selection a delineation of potentially affected water resources located along the selected route will be performed. The Applicant would minimize impacts to water resources by spanning the resources where possible. Any unavoidable impacts to water resources would be identified prior to construction and mitigated for in accordance with all federal, state, and local permitting conditions.

**COMMENT #243 COMMENT SOURCE: LETTER**

**Name: Farry, Joe**

**Comment:**

A pedestrian bridge connects the north and south portions of St. John's Abbey property. This wooden bridge was specially constructed as a beautification project in conjunction with the construction of I-94 over 35 years ago. Access to the bridge is by way of an earthen ramp

supporting a cement walkway. The bridge is used extensively by the students and employees of the two colleges as well as visitors to St. John's. The bridge enables them to bike, run, and cross country ski in safety. It also provides a connection to the Wobegon trail and forms a segment of the many bike tours that are organized throughout the summer. The surrounding terrain is very hilly. It seems probable that the ROW would have to be located some distance from the I-94 ROW to take into account the height of the bridge and the raised configuration of the approaches. If moved to the north, the ROW would directly impact local home sites. This should be noted when calculating the final EIS.

**Response:**

Comment noted.

**COMMENT #244 COMMENT SOURCE: LETTER**

**Name: Farry, Joe**

**Comment:**

Sheet 79 does not reflect the extensive wetlands from Stumpf Lake on the St. John's campus to the St. Wendel bog. Sheet 79 highlights the wetlands north of the Wobegon Bike Trail, but not those south of the Trail, but not those south of the Trail. But the attached National Wetlands Inventory indicates these are integrated wetlands that extend from south of I-94 to the St. Wendel bog. Historically the railroad bisected this wetland by constructing a raised berm, which required constant reinforcement. (The surface of the bike trail, which now rests on this berm, must also be regularly patched). On the attached map, the Wobegon Bike Trail is the diagonal line that crosses from the bottom to the top of the map. (And there are those who are recommending that Route D should cross this wetland!). The wetland also extends to the area around exit 156 on I-94. The draft EIS does not do justice to this extensive system of wetlands.

**Response:**

The maps included in Appendix H of the DEIS include all National Wetland Inventory (NWI) wetlands, including the areas that you reference in your comment. Certain areas that are designated as wetland on the NWI are also designated as Minnesota County Biological Survey sites, which are highlighted differently on the maps.

**COMMENT #245 COMMENT SOURCE: LETTER**

**Name: Farry, Joe**

**Comment:**

Moving the power line ROW to the north side of the Collegeville Road would directly impact the facilities of the Huls Bros Trucking. The aerial photo used to illustrate the EIS is several years out of date. I suggest that a 2010 aerial photo be consulted to show the buildings that have been built on this site over the past three years. Huls Bros Trucking is a substantial commercial operation that would be significantly impacted if the power line were located in this area.

**Response:**

The date of the aerial imagery used for this project is 2009.

**COMMENT #246 COMMENT SOURCE: LETTER**

**Name: Fox, Kurt**

**Comment:**

I would prefer to not have Route G rest stops, cemetery, houses in Avon and trees near St. John's should be avoided.

**Response:**

Comment noted.

**COMMENT #247 COMMENT SOURCE: LETTER**

**Name: Groetsch, Mary Ann**

**Comment:**

I am not in favor of the transmission line coming thru this area (Albany). It zig zags thru this area. I believe it should follow the freeway where you have a more straight route and it would not cross all the farm land. Don't we as farmers have any rights?

**Response:**

Comment noted.

**COMMENT #248 COMMENT SOURCE: LETTER**

**Name: Grutsch, John**

**Comment:**

As the Mayor of the City of Avon, I wish to go on record on behalf of the City of Avon, as opposing "Route D" of the HVTL project. Were the HVTL to be placed on the north side of I-94 in Avon a significant number of residents would be displaced. The population density in this approximately 1/4 mile urban area of the City of Avon along the I-94 corridor is considerably higher than the vast majority of the rural areas being considered. Were the line to be placed on the south side of this proposed "Route D" along the I-94 corridor in Avon, not only would there be residential displacement, but there is a potential for very serious detrimental impact to the local economy of our city. Most of your largest employers and property tax payers in the City of Avon are located in this area. For instance, Blattner Energy, Columbia Gear, Copart, Tischler Wood Products, and PSI Inc. If these businesses were to be displaced the effect on our local economy and tax base would be catastrophic.

**Response:**

Comment noted.

**COMMENT #249 COMMENT SOURCE: LETTER****Name: Grutsch, John****Comment:**

Avon is such that significant numbers of adults and children would be exposed to EMF exposure.

**Response:**

See response to comment 33.

**COMMENT #250 COMMENT SOURCE: LETTER****Name: Hafner-Fogarty, Rebecca****Comment:**

I believe strongly that the route should remain along the preferred (green) route. Adhering to this route avoids the population centers of Avon, St. John's University and Collegeville. It also avoids sensitive ecologic areas near St. John's University, and avoids the expense of putting the line underground to traverse the lakes and wetlands in the immediate Avon area. If the route chosen runs thru Avon and follows I-94 it should be placed underground to mitigate environmental and human impacts coming above ground at the substation at St. Joseph.

**Response:**

Comment noted.

**COMMENT #251 COMMENT SOURCE: LETTER****Name: Harvey, Fred****Comment:**

Please stick to the preferred route along I-94.

**Response:**

Comment noted.

**COMMENT #252 COMMENT SOURCE: LETTER****Name: Heim, Kevin****Comment:**

Although not the purpose of the EIS I challenge the need for the CapX2020 project where the need has been rationalized based upon a) energy consumption and b) reliability. The most recent Certificate of Need for the Fargo-St. Cloud - Monticello line is dated October 30, 2007 where it was based upon the original filing on August 16, 2007. With the robust economy just prior to 2007, it is not a surprise that a plausible justification could be presented at that time, but now that we know in hind site that the economy was a distortion in time, it is less clear if there is truly

a need for additional energy; Significant amount of literature indicates the population is or will soon decline such that electrical consumption will, or has already begun to decline. CapX2020 is obligated to the owner's of the land to revisit the need-based argument and present that to the citizens. I've not been able to find evidence of an existing reliability issue, nor have there been reports by my mother or her neighbors of such a problem, therefore I am at a loss of understanding the purported reliability issue.

**Response:**

See response to comment 150.

**COMMENT #253 COMMENT SOURCE: LETTER**

**Name: Heim, Kevin**

**Comment:**

It is my understanding that power lines of this type generally intended to follow interstate roadways, but in this case CapX2020's Applicant Preferred Route deviates from the path along I-94 between Sauk Center and St. Cloud, plus it costs \$4Million more than the above ground Option D that follows the interstate (\$254M and \$250M, respectively, from DEIS Table 1.6-1 on page 1-40). By selecting Option D, CapX2020 would save itself and its customers money, and it would prevent the proliferation of high voltage power lines by placing them along the interstate as intended.

**Response:**

Comment noted.

**COMMENT #254 COMMENT SOURCE: LETTER**

**Name: Heim, Kevin**

**Comment:**

In addition there is the aesthetic impact to be considered.

**Response:**

Aesthetic impacts are discussed in Section 5.3.2, 6.3.2, and 7.3.2 of the Draft EIS.

**COMMENT #255 COMMENT SOURCE: LETTER**

**Name: Heim, Kevin**

**Comment:**

In reading page 5-92 it appears that the USFWS and MnDNR have two concerns with the Applicant Preferred Route as a result of "...being primary migration and staging areas for high concentrations of waterfowl and other migratory birds" and "...these two locations would have the highest potential along the Applicant Preferred Route for avian collisions." The subsequent paragraph notes that "Electrocution of large birds, such as raptors, is a concern typically related

to distribution lines." The report goes on to indicate that protected raptors such as the Bald Eagle have been shown to be present in the Applicant Preferred Route, yet the report does not indicate any raptors in the alternate routes. Those few lines would indicate the environmental impact to Bald Eagles would be lessened if the Applicant Preferred Route would be eliminated from consideration. I'm unimpressed with the lack of detail and findings in the section on potential impact to flora and fauna, as I would consider that a key deliverable of such a document. My interpretation is that the EIS is incomplete therefore CapX2020 should not be allowed to proceed. Is there a way to resolve these deficiencies?

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. In this instance the comparison evaluates the number of protected species occurrences within proximity to proposed routes if present. Refer to Sections 5.9, 6.9, and 7.9 of the FEIS for updated tables calculating protected species within one mile of each route.

**COMMENT #256 COMMENT SOURCE: LETTER**

**Name: Heim, Kathleen**

**Comment:**

My major crops are corn, soybeans, wheat, and alfalfa and meadow hay. We must keep this in production for now and the future.

**Response:**

Comment noted.

**COMMENT #257 COMMENT SOURCE: LETTER**

**Name: Heim, Kathleen**

**Comment:**

We have a lot of wildlife including many deer, wild turkeys, pheasants and numerous birds along with beautifully wooded areas that pave the way to the river.

**Response:**

Natural land resources including flora and fauna are discussed in Sections 5.9, 6.9, and 7.9 of the DEIS.

**COMMENT #258 COMMENT SOURCE: LETTER**

**Name: Heim, Kathleen**

**Comment:**

Our Century Farm is a treasure. I'm very proud of the Century Farm status. My husband was the fourth generation resident to live and work on the 320 acres of farmland located on County Road 4 and County Road 133 in Stearns County.

**Response:**

See response to comment 136.

**COMMENT #259 COMMENT SOURCE: LETTER**

**Name: Heim, Kathleen**

**Comment:**

Now the human impact of living and working near the huge power lines would be a problem and hazard on this property.

**Response:**

See response to comment 33.

**COMMENT #260 COMMENT SOURCE: LETTER**

**Name: Heim, Kathleen**

**Comment:**

Property values will drop both for farming and non-farming use of the land with power lines on them. This will have an enormous financial impact on my family for many years because of paying taxes and not being able to fully use the land.

**Response:**

Comment noted.

**COMMENT #261 COMMENT SOURCE: LETTER**

**Name: Heim, Kenneth**

**Comment:**

The Heim Century Farm - there is no desire to see this beautiful land having power lines running over it.

**Response:**

Comment noted.

**COMMENT #262 COMMENT SOURCE: LETTER**

**Name: Heinen, Eugene & Bernice**

**Comment:**

We are pleading with you. Please do not put the line on 260th St Richmond. We have so much wildlife around here and so many homes on this road.

**Response:**

Multiple alignments are under consideration. No alignments are proposed on 260th St in Richmond. Refer to Appendix H for detailed maps of the proposed alternatives.

**COMMENT #263 COMMENT SOURCE: LETTER**

**Name: Hellermann, John**

**Comment:**

I farm organically in Melrose, Stearns County; this is not a suitable area for a powerline.

**Response:**

Mitigative actions for organic agricultural lands are discussed in Appendix B of the Agricultural Impact Mitigation Plan for the project; a copy of this plan is included in the DEIS.

**COMMENT #264 COMMENT SOURCE: LETTER**

**Name: Hellermann, John**

**Comment:**

This area is heavily populated with wildlife.

**Response:**

Comment noted.

**COMMENT #265 COMMENT SOURCE: LETTER**

**Name: Hellermann, John**

**Comment:**

Could interfere with center pivot operation.

**Response:**

See response to comment 105.

**COMMENT #266 COMMENT SOURCE: LETTER**

**Name: Hellermann, John**

**Comment:**

Route going east on county road 17 has many houses close to the road.

**Response:**

Comment noted.

**COMMENT #267 COMMENT SOURCE: LETTER**

**Name: Hellermann, John**

**Comment:**

This county 17 route is also a scenic route with many lakes nearby and home to a state park.

**Response:**

County Road 17 is not a designated scenic byway; however, aesthetic effects on the environment are presented in Section 7.3.2 of the Draft EIS. Potential mitigation measures are discussed in Section 7.3.3.

**COMMENT #268 COMMENT SOURCE: LETTER**

**Name: Heurung, Donald**

**Comment:**

No to going through the city of Avon and between upper and Middle Spunk Lakes. There are much better routes north and south of the Avon area, and at a lower cost, I'm sure.

**Response:**

Comment noted.

**COMMENT #269 COMMENT SOURCE: LETTER**

**Name: Heurung, Marge**

**Comment:**

Not to Stratford Addition, Avon, MN. I was shocked to hear that our addition on Middle Spunk Lake was being considered for location of the power line project. How inappropriate when there is land available that is not disruptive to existing homes.

**Response:**

Comment noted.

**COMMENT #270 COMMENT SOURCE: LETTER**

**Name: Holt, Brian**

**Comment:**

I farm along I-94 and the transmission line project make it harder to farm around and have aerial spraying done.

**Response:**

See responses to comments 54 and 105.

**COMMENT #271 COMMENT SOURCE: LETTER**

**Name: Holt, Brian**

**Comment:**

It also depreciates the land value. I live by Hwy 34 and I 94 making the land an excellent housing area and the transmission line project would make that non existent and also depreciate the land value. I don't want it.

**Response:**

Comment noted.

**COMMENT #272 COMMENT SOURCE: LETTER**

**Name: Island, Reuben & Sandra**

**Comment:**

Does not want route going through their farmland Sect 19, Twp 128, Range 41 Elk Lake Grant County Township.

**Response:**

Comment noted.

**COMMENT #273 COMMENT SOURCE: LETTER**

**Name: Jarnof, Gabe**

**Comment:**

The city of Avon is a tight cluster of homes and small businesses sandwiched between Upper and Middle Spunk Lake and split by I-94. This passageway is extremely narrow and the right of ways required for the transmission line makes route D a very expensive alternative given the homes and businesses that would need to be displaced.

**Response:**

Comment noted.

**COMMENT #274 COMMENT SOURCE: LETTER**

**Name: Jarnof, Gabe**

**Comment:**

Environmentally, Route D through Avon would be impacting some of Minnesota's greatest natural resource... our lakes.

**Response:**

Comment noted.

**COMMENT #275 COMMENT SOURCE: LETTER**

**Name: Jarnot, Julie**

**Comment:**

In Middle Spunk Lake, right in our neighborhood and along the freeway, there are nesting loons, ducks, and geese each year. Many wild fowl spend time here as they migrate each spring and fall. We fear the power lines might disrupt this delicate eco-system and permanently damage this natural resource.

**Response:**

Comment noted.

**COMMENT #276 COMMENT SOURCE: LETTER**

**Name: Jarnot, Julie**

**Comment:**

Having these lines, whether overhead or underground, would perhaps result in condemnation of a number of residences and destroy the atmosphere and living conditions of the entire neighborhood, upsetting hundreds of lives and causing severe damage to this circle drive that forms the pathway in and out of the neighborhood.

**Response:**

Comment noted.

**COMMENT #277 COMMENT SOURCE: LETTER**

**Name: Jarnot, Julie**

**Comment:**

There is also a beach area that provides for recreation throughout the summer. We also have a private boat landing in this homeowner's association. This is a close community and losing neighbors and recreation areas and the closeness we share is not acceptable.

**Response:**

The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The applicant will work with property owners to develop mitigation measures for impacts to recreational uses which are presented in Sections 5.3.3, 6.3.3 and 7.3.3 of the Draft EIS.

**COMMENT #278 COMMENT SOURCE: LETTER****Name: Jarnot, Julie****Comment:**

Along with concerns of the loss of the community, the financial costs to the people of the neighborhood would be severe if power lines go through this area and, indeed the city of Avon as a whole. With the wide right of ways projected and small area of this neighborhood and the city of Avon, property values of all residences and commercial ventures would likely drop significantly, at a time when we've already seen downward pressure on property values because of the economy. This really seems an undue burden, not to just a few people, but literally to hundreds and hundreds of people and a large number of businesses.

**Response:**

Comment noted.

**COMMENT #279 COMMENT SOURCE: LETTER****Name: Jarnot, Julie****Comment:**

Finally, there is a safety concern with having these power lines run right through a residential area where there are hundreds and hundreds of residents. We are told these lines are safe but we also know many documented cases of stray voltage, of illness, of health issues for people and animals under and around such high voltage power lines. It does not seem logical to run these lines through a concentrated population area, because of the potential health dangers.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2, and 7.2 of the Draft EIS.

**COMMENT #280 COMMENT SOURCE: LETTER****Name: Johannes, Donna****Comment:**

I strongly oppose the North "Preferred & Alternate Route A". Negative effects on ecology and environment, including natural areas and wildlife (ex. Shepards Lake, St. Wendel Swamp, which was given to the DNR from Stearns County. A rare swamp with unusual cold water bog and home to rare plants and numerous lady slippers.) And other ecologically sensitive wetlands and areas.

**Response:**

Comment noted.

**COMMENT #281 COMMENT SOURCE: LETTER**

**Name: Johannes, Donna**

**Comment:**

Traversing of agricultural property affecting livelihoods and jeopardizing the heritage, preservations and integrity of family farms, including numerous "Century" and generational farms.

**Response:**

See response to comment 136.

**COMMENT #282 COMMENT SOURCE: LETTER**

**Name: Johannes, Donna**

**Comment:**

Electromagnetic fields may contribute to childhood and adult Leukemia, adult brain cancer, Lou Gehrig's disease, miscarriages and worsening of immune-related diseases.

**Response:**

See response to comment 280.

**COMMENT #283 COMMENT SOURCE: LETTER**

**Name: Johannes, Donna**

**Comment:**

Minnesota Statute 216E.03 requires first consideration of potential routes that would use or parallel existing railroad and highway rights-of-way...such as the I-94 corridor. 42% of the north routes approximately 39 miles creates new rights-of-way via private parcel lines, a clear departure from Minnesota's policy on non-proliferation. Between Freeport and St. Cloud the proposed routes deviates dramatically and cut across rural and agricultural land.

**Response:**

Refer to Table 3.2.2 and 3.2.3 in the FEIS for a presentation of corridor sharing statistics with roadways, transmission lines, railroads etc.

**COMMENT #284 COMMENT SOURCE: LETTER**

**Name: Johannes, Donna**

**Comment:**

The line in that area could be buried under the lakes with no emissions of EMFs.

**Response:**

Comment noted.

**COMMENT #285 COMMENT SOURCE: LETTER****Name: Johannes, Donna****Comment:**

Spoiling pristine, rural, agricultural century farms and ecologically sensitive wetlands just doesn't make sense. The I-94 corridor is already a spoiled view with the freeway itself, numerous billboards, traffic, turkey barns, and etc.

**Response:**

Comment noted.

**COMMENT #286 COMMENT SOURCE: LETTER****Name: Johannes, Donna****Comment:**

"Right to Farm" ordinances Stearns County's agricultural development and land use ordinances are some of the most restrictive in the state of Minnesota. Stearns County has expressed the importance of open space and farmland preservation through their comprehensive planning initiatives.

**Response:**

See response to comment 157.

**COMMENT #287 COMMENT SOURCE: LETTER****Name: Kantor, Edward****Comment:**

I attended the meeting in St. Joe and among the remarks made expressed that I-94 currently wouldn't work as it would cross the Avon rest stop). Why are we more concerned about a rest stop when no people live there? A few truckers park there for a limited time. The existing right of way already does exist more readily than new cropland or swamps.

**Response:**

See response to comment 207.

**COMMENT #288 COMMENT SOURCE: LETTER****Name: Kerfeld, Art****Comment:**

Please keep along I-94 corridor!

**Response:**

Comment noted.

**COMMENT #289 COMMENT SOURCE: LETTER**

**Name: Kerfeld, Art**

**Comment:**

Some of the people that spoke at the meetings are more concerned for the wildlife, the wildlife will adapt much easier than will the dairy cows.

**Response:**

Comment noted.

**COMMENT #290 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off County Rd 17 Melrose, MN: State Forest right off of Co Rd 17, camping & trails. Lake Silvia and recreational picnic area. Birch Lake - vacationers of the fresh lake water. Snowmobile trail right along Co Rd 17.

**Response:**

Comment noted.

**COMMENT #291 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off of County Rd 17 Melrose, MN: Bald Eagles.

**Response:**

Comment noted.

**COMMENT #292 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off of County Rd 17 Melrose, MN: growing farm community with adding future animals and buildings. Property value we need to be appreciated now and future generations. All generations should get paid. Loss of personal income from land value going down. Future crop loss, with maintenance work done on power line.

**Response:**

Comment noted.

**COMMENT #293 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off of County Rd 17 Melrose, MN: drinking water from our wells, preserved for our family and farm animals.

**Response:**

See response to comment 109.

**COMMENT #294 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off of County Rd 17 Melrose, MN: risk of our health, living conditions, we the farm families, our cows, cats, dogs, are here from birth until death 24/7. Stray voltage.

**Response:**

Comment noted.

**COMMENT #295 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay off of County Rd 17 Melrose, MN: airplanes spraying our fields, impossible with a high line, crop loss, inconvenience of field work, removal of top soil 1st then replaced after pole is in place.

**Response:**

See responses to comments 54, 105, and 111.

**COMMENT #296 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

All generations need to get paid for power line on their property. It's important to include people now and in the future in this project and thank them with money for having the pole or line on their land. Any % of the profits of CapX2020 be asking too much?

**Response:**

See response to comment 20.

**COMMENT #297 COMMENT SOURCE: EMAIL**

**Name: Kerfeld, Tim**

**Comment:**

Reasons to stay on I-94: easy access, MN/DOT does not own the interstate; it already exists, extremely expensive to take line off I-94. Will not impact as many businesses and farming.

**Response:**

See comment 22.

**COMMENT #298 COMMENT SOURCE: LETTER**

**Name: Lindeman, Myrna**

**Comment:**

It is my understanding there is noise connected with this line.

**Response:**

Transmission lines produce noise under certain conditions. The level of noise depends on conductor conditions, voltage level, and weather conditions. Generally, activity-related noise levels during the operation and maintenance of transmission lines are minimal and do not exceed the MPCA Noise Limits outside of the right-of-way. No significant noise impacts are anticipated from the proposed project. Refer to Sections 5.1, 6.1, and 7.1 Human Settlement in the DEIS for a discussion on noise.

**COMMENT #299 COMMENT SOURCE: LETTER**

**Name: Lindeman, Myrna**

**Comment:**

It does not seem cost effective either to put it underground in this area.

**Response:**

The utilities are proposing overhead lines because of reliability and cost. While it is common for lower voltage transmission lines to be buried (lines less than 69 kV), it is rare to build high voltage transmission lines underground. Underground high-voltage transmission lines generally cost up to 10 times more than overhead high-voltage lines.

**COMMENT #300 COMMENT SOURCE: LETTER**

**Name: Manthe, Jeff**

**Comment:**

I want to state my opposition to any plan that might include running the transmission lines along I-94 through Avon, MN. This would run the lines through both heavy residential and commercial

**Response:**

Comment noted.

**COMMENT #301 COMMENT SOURCE: LETTER**

**Name: Manthe, Jeff**

**Comment:**

The impact on families and businesses would be severe. Homes and businesses might be condemned and the balance of the community destroyed.

**Response:**

Comment noted.

**COMMENT #302 COMMENT SOURCE: LETTER**

**Name: Manthe, Jeff**

**Comment:**

The disruption to the ecosystem would also be significant. There are nesting loons, geese and ducks in these areas and many migrating species each spring and fall.

**Response:**

See response to comment 84.

**COMMENT #303 COMMENT SOURCE: LETTER**

**Name: McCoy, Keith**

**Comment:**

I see no reason to leave the I-94 corridor and drop south to sec 24 in Moe twp. Just to move east 1100 ft on the route.

**Response:**

Comment noted.

**COMMENT #304 COMMENT SOURCE: LETTER**

**Name: McCoy, Keith**

**Comment:**

Don't crap-up the countryside, with lines running on undeveloped beautiful land. Crap-up the freeway.

**Response:**

Comment noted.

**COMMENT #305 COMMENT SOURCE: LETTER**

**Name: Morgel, Christine**

**Comment:**

I think the power line would have a negative impact on the environment. The area around County Rd 3 has wetlands, wildlife and rich farmland. I believe the line is not Minnesota environmentally safe.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. Water resources, such as wetlands are discussed in Sections 5.8, 6.8, and 7.8 of the DEIS. Natural Land Resources, including flora and fauna are discussed in Sections 5.9, 6.9, and 7.9 of the DEIS. Prime Farmland is discussed in Land Based Economies Sections 5.7, 5.8, and 5.9 of the DEIS.

**COMMENT #306 COMMENT SOURCE: LETTER**

**Name: Morgel, Christine**

**Comment:**

Why can't the line follow I-94? In the areas, such as wayside rests and lakes or other key areas that follow I-94, possibly go around? Or underground?

**Response:**

See response to comment 207.

**COMMENT #307 COMMENT SOURCE: LETTER**

**Name: Morgel, Terrence**

**Comment:**

Isn't it logical, from the point of building and maintaining the power line to keep it along I-94 instead of criss crossing the country?

**Response:**

Comment noted.

**COMMENT #308 COMMENT SOURCE: LETTER**

**Name: Morreim, David**

**Comment:**

Installation of the line would have a negative impact on existing agricultural use and future development for residential use.

**Response:**

Agricultural land uses can continue within a transmission line easement.

**COMMENT #309 COMMENT SOURCE: LETTER**

**Name: Noll, M**

**Comment:**

Private airstrip (illegible) to Rt. E 60 - 240 map sheet 77 N of Fifth (illegible) 1000' E of Sand Lake Rd, approach end of runway. Paperwork is in to FAA.

**Response:**

There are no state or federal regulations for private use airports. Private use airports are a land use resource and are considered equally with other land use resources for the purposes of this EIS. When a final alignment is selected the applicant can meet with potential airport representatives to mitigate local impacts and solicit suggestions on how to work together details of final pole placement. Applicants will comply with federal and state regulations for public use airports

**COMMENT #310 COMMENT SOURCE: LETTER**

**Name: Nordos, Gerry & Kathy**

**Comment:**

We strongly support the preferred (green on map) route along I-94 for the transmission line project in the Alexandria area. We disapprove of the alternate route that would run along Cty Rd 21 and Cty Rd 4 between Lake Mary and Lake Andrew.

**Response:**

See response to comment 70.

**COMMENT #311 COMMENT SOURCE: LETTER**

**Name: Percuoco, Michael**

**Comment:**

The area along I-94 has many environmentally sensitive sections, especially wetland and lakes from east of St. Johns to Avon. There is not enough land area from the interstate to the frontage roads or the lakes along this route. There is a natural prairie near the St. John's exits that need to be circumvented as well.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. Possible mitigation measures, including undergrounding in the Avon area are discussed in Section 7.9.3 of the DEIS.

**COMMENT #312 COMMENT SOURCE: LETTER**

**Name: Percuoco, Michael**

**Comment:**

Is there really a need for this line?

**Response:**

See response to comment 150.

**COMMENT #313 COMMENT SOURCE: LETTER**

**Name: Percuoco, Michael**

**Comment:**

We live in this area because of the quality of life and the pristine environment.

**Response:**

Comment noted.

**COMMENT #314 COMMENT SOURCE: LETTER**

**Name: Ruprecht, John**

**Comment:**

My concerns with the entire project range from whether or not there actually exists a need (per testimony from an energy audit professional).

**Response:**

See response to comment 150.

**COMMENT #315 COMMENT SOURCE: LETTER**

**Name: Ruprecht, John**

**Comment:**

There are countless century farms which would likely be defaced and mutilated by forcing the large and unsightly structures on the sacred soil founded by settlers.

**Response:**

See response to comment 136.

**COMMENT #316 COMMENT SOURCE: LETTER**

**Name: Ruprecht, John**

**Comment:**

My biggest concern, beyond the unsightly view, is actually the detriments of defoliation on and near critical habitat.

**Response:**

Critical habitat is discussed in the Natural Land Resources Sections 5.9, 6.9, and 7.9 of the DEIS.

**COMMENT #317 COMMENT SOURCE: LETTER**

**Name: Ruprecht, John**

**Comment:**

I have heard from many landowners who would be directly impacted by the power line, and they have stated that they would request that the State purchase their property (even at a loss) and vacate the area. Such action would prove to be a prohibitive burden to the taxpayers of Minnesota.

**Response:**

In certain situations, landowners can request that the Applicant purchase their entire property. See Minnesota Statute 216E.12, subdivision 4 Eminent Domain Powers; Power of Condemnation.

**COMMENT #318 COMMENT SOURCE: LETTER**

**Name: Schlagel, Arlan & Viola**

**Comment:**

Since the substation for the Fargo-St. Cloud transmission line has been decided and is now close to Co Rd 138 it seems logical to continue either along Co. Rd. 138 or cross the road and angle towards and along the Sauk River behind Schleper farm bldgs and on toward the I-94 corridor, keeping it in open areas with no homes involved.

**Response:**

Comment noted.

**COMMENT #319 COMMENT SOURCE: LETTER**

**Name: Schwalbe, Lisa**

**Comment:**

My family feels strongly that the preferred route breaks too many new grounds. Brockway township has 4.75 miles of proliferation and only .5 miles of non-proliferation. Avon Township has 5 miles of proliferation and 3.25% non-proliferation. Albany has 1 mile of proliferation and 0 miles of non-proliferation. That's a total of 74% proliferation. How can this be following the rules and regulations?

**Response:**

Refer to Table 3.2.2 and 3.2.3 in the FEIS for a presentation of corridor sharing statistics with roadways, transmission lines, railroads etc.

**COMMENT #320 COMMENT SOURCE: LETTER**

**Name: Schwalbe, Lisa**

**Comment:**

I would also hate to see the prime farmland wasted as farmers are forced to quit their jobs.

**Response:**

Comment noted.

**COMMENT #321 COMMENT SOURCE: LETTER**

**Name: Schwalbe, Lisa**

**Comment:**

Beautiful Pelican Lake will be in harms way, destroying more nature.

**Response:**

Potential impacts to Pelican Lake are presented in Section 5.9.2 of the DEIS in the Rare and Unique Natural Resources/Critical Habitat discussion.

**COMMENT #322 COMMENT SOURCE: LETTER**

**Name: Spanier, Patricia**

**Comment:**

I am a concerned homeowner and do not want a power line in our area. There are many children and adults that will be affected.

**Response:**

Comment noted.

**COMMENT #323 COMMENT SOURCE: LETTER**

**Name: Thielen, Marvin & Judy**

**Comment:**

We feel that Alternate Route A would be a much more feasible route. That route is a much less populated area than the I-94 corridor Preferred Route. The people living/farming/business owners along the I-94 corridor already have to "put up" with the freeway and setbacks from the freeway as far as the right a ways and restrictions. Basically the freeway is like the Berlin Wall. It cannot be crossed. An option to look at would be: Go south of the freeway on MN 237 at the New Munich exit. Go to Section 1, south line and the north line section 11. Then head west along those two section lines until you hit section lines 2 and 11 head west. You will come out right on Cty Rd 173 and Riverview Rd right where you want the line to come out. This would take you away from most of the Melrose Wellhead Protection Area, you would just be in a small section of it, in the south corner and you would clear Melrose without a problem.

**Response:**

These options are within the 1000 foot corridor for consideration and would therefore be alternatives for the final transmission line alignment.

**COMMENT #324 COMMENT SOURCE: LETTER**

**Name: Thielen, Marvin & Judy**

**Comment:**

The poles are 30 to 50 feet deep, which would be in the ground water, as the water table is so high in our area. Do the poles act like a well casing? We have 150ft setbacks from wells. Would we also have setbacks from these poles?

**Response:**

See response to comment 109.

**COMMENT #325 COMMENT SOURCE: LETTER**

**Name: Thielen, Marvin & Judy**

**Comment:**

If we have to deal with this power line for the rest of our lives on this farm and also future generations have to deal with it and put up with the "eye sores", we feel the "one-time payment" does not do justice. There should be yearly compensation as the power line benefits everybody at our expense and losses.

**Response:**

Comment noted.

**COMMENT #326 COMMENT SOURCE: LETTER**

**Name: Thompson, Steven**

**Comment:**

If the 140th ave south route is used it would be best to bury the power lines about 1 mile each side of Lesmeister's airstrip or use the south route Breckenridge.

**Response:**

See comment 3.

**COMMENT #327 COMMENT SOURCE: LETTER**

**Name: Lyon, Joe**

**Comment:**

Whereas, Shepard Lake is an important part of an exceptionally rare St. Wendel Bog complex and is just a little over two miles from the St. Wendel Bog area which is a designated scientific

and wildlife management area by the MNDNR. The distance between the two areas results in Shepard Lake being an important migration and nesting supplement to the extremely rare and unique wildlife and birds that reside in the St. Wendel Bog area.

**Response:**

Comment noted.

**COMMENT #328 COMMENT SOURCE: LETTER**

**Name: Lyon, Joe**

**Comment:**

The Brockway Township Board of Supervisors believes that the route parallels as close as possible to I-94 or identified as Preferred Route D, as described in the DEIS would be the route that does the least amount of harm to human life and the environment.

**Response:**

Comment noted.

**COMMENT #329 COMMENT SOURCE: LETTER**

**Name: Waletzko, Raymond**

**Comment:**

Keep the transmission line along I-94.

**Response:**

Comment noted.

**COMMENT #330 COMMENT SOURCE: LETTER**

**Name: Waletzko, Raymond**

**Comment:**

We are too close to the road and our house is too close to the power line route - please our livelihood is at stake.

**Response:**

Comment noted.

**COMMENT #331 COMMENT SOURCE: LETTER**

**Name: Walz, David**

**Comment:**

It is my understanding that one route is being considered, may have the following impact on my property. The impact would be negative on wetlands, prime agricultural farmland, Shepard's Lake, several other palustine water resources.

**Response:**

The summary section of the DEIS provides an overview of potential impacts by route.

**COMMENT #332 COMMENT SOURCE: LETTER**

**Name: Walz, David**

**Comment:**

Negatively impact some of Stearns County's historic resources.

**Response:**

Potential impacts to cultural resources in Stearns County are presented in Section 7.6.2 of the

**COMMENT #333 COMMENT SOURCE: LETTER**

**Name: Walz, David**

**Comment:**

I am asking for your support to direct this 345 kV transmission line down the I-94 corridor where it is already an established route for this use. In areas where the appearance is a concern; why not place underground.

**Response:**

Comment noted.

**COMMENT #334 COMMENT SOURCE: LETTER**

**Name: Weber, Steve & Dana**

**Comment:**

Specific, to our family, there is a safety concern with having these power lines running right next to our home. We have 2 children. Our oldest has Autism. We have grave concerns that any additional environmental challenges to his health will result in adverse affects to his neurological and physical health. He is at the most volatile stage in his life, nearing puberty, where 1 in 4 pre-teens and teens with Autism develop seizures as well as face regression and heightened sensory disorders due to the changes their bodies are going through. Additionally, our youngest child suffers from recurring severe migraine headaches. We have recently found he has spots on his brain and we are extremely concerned of the adverse effects any electromagnetic pollution will have on both of our children's health, not to mention ours and those around us. While your studies conclude that the levels of EMF that are emitted are considered "safe", this does not take into account individuals with acute or chronic disorders, due to the generalizations any study must provide.

**Response:**

There is no research to indicate that special needs individual are more susceptible to potential effects from EMF.

**COMMENT #335 COMMENT SOURCE: LETTER****Name: Weber, Steve & Dana****Comment:**

If Route D were to be approved, regardless of whether our home would be displaced by the placement of the HVTL, we would be forced to move in order to protect our children. This would cause extreme and undue financial hardship to our family during a time when we have suffered deep cuts in our household income due to our employer's actions. Our home's value has deteriorated as a result of the poor economy, which adds to the financial strain of any costs we would need to incur in order to relocate to a safer home.

**Response:**

Comment noted.

**COMMENT #336 COMMENT SOURCE: LETTER****Name: Weber, Steve & Dana****Comment:**

This area also has a lake just along each side with a connecting stream underneath the freeway. In Middle Spunk Lake, right in our neighborhood and along the freeway, there are nesting loons, ducks and geese each year. Many wild fowl spend time here as they migrate each spring and fall. We fear the power lines might disrupt this delicate eco-system and permanently damage this natural resource.

**Response:**

Potential impacts to fauna, such as raptors, waterfowl, and other bird species, are presented in Section 7.9.2 of the DEIS. Possible mitigation measures, including undergrounding in the Avon area are discussed in Section 7.9.3 of the DEIS.

**COMMENT #337 COMMENT SOURCE: LETTER****Name: Weber, Steve & Dana****Comment:**

There are over ninety homes in this neighborhood, tightly nestled between the freeway and lake. Having these lines, whether overhead or underground would perhaps result in the condemnation of a number of residences and destroy the atmosphere and living conditions of the entire neighborhood, upsetting hundreds of lives and causing severe damage to this circle drive that forms the pathway in and out of the neighborhood.

**Response:**

Comment noted.

**COMMENT #338 COMMENT SOURCE: LETTER****Name: Weber, Steve & Dana****Comment:**

There is a park in the center of the neighborhood that provides recreation to individuals, including the local youth baseball and other sports programs. There is also a beach area that provides for recreation throughout the summer. This is a close community and losing neighbors and recreation areas and the closeness we share is not acceptable.

**Response:**

The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition. The applicant will work with property owners to develop mitigation measures for recreational impacts, options for which are presented in Sections 5.3.3, 6.3.3 and 7.3.3 of the Draft EIS.

**COMMENT #339 COMMENT SOURCE: LETTER****Name: Weber, Steve & Dana****Comment:**

Along with the concerns of the loss of community, the financial costs to the people of the neighborhood would be severe if the power lines go through this area and, indeed, the city of Avon as a whole. With the wide right of ways projected and rather small areas of this neighborhood and the city of Avon, property values of all residences and commercial ventures would likely drop significantly, at a time when we've already seen downward pressure on property values because of economy.

**Response:**

Comment noted.

**COMMENT #340 COMMENT SOURCE: LETTER****Name: Wieber, Don****Comment:**

When we were doing the Wobegon Trail years ago they said that it would be used for this purpose also, why not use it when it would not bother anyone.

**Response:**

Portions of Route D and the Applicant Preferred Route parallel the Lake Wobegon Trail.

**COMMENT #341 COMMENT SOURCE: EMAIL**

**Name: Blattner, Tom**

**Comment:**

My concern is the route along County Road 10 and turning east onto St. Anna Drive. The proximity of the homes to the road on that 2 mile stretch seems awfully close and would provide no room for the line. I propose an alternate route that would turn south along Hwy 238 and turn east onto 360th St. tying into County Road 154 along the preferred route. The number of homes within a close proximity to the ROW is much less (one vs. seven) than along County Rd 10 and St Anna Drive. We would eliminate 2 corner structures as well.

**Response:**

The HWY 238 to 360th St option was considered and dropped from consideration because of potential impacts to residences in the area.

**COMMENT #342 COMMENT SOURCE: EMAIL**

**Name: Blattner, Tom**

**Comment:**

I am not against putting the line near my home as long as it does not harm the old growth oaks in that area. I ask that you take a drive along these two areas to personally assess the impact to the homes (not the aesthetics of the area - we can all argue that) at the time you did the study my house was not yet built (we started construction in May of 2009).

**Response:**

See the response to comment 6.

**COMMENT #343 COMMENT SOURCE: EMAIL**

**Name: Blattner, Tom**

**Comment:**

Another suggestion I have is to follow I-94 through Albany to Sand Lake Road, turn south and continue along Route E until St. Cloud. This would eliminate approx 8 corner structures as well.

**Response:**

The I-94 to Sand Lake Rd segment was dropped from consideration during the elimination of segments by the permit applicant.

**COMMENT #344 COMMENT SOURCE: EMAIL****Name: Check, Terry****Comment:**

I believe insufficient attention has been given in these reports to the actual need for the project in the first place. Xcel Energy and Great River Energy are for-profit companies that have a direct stake in convincing publics to consume more energy. The studies they have put forward about the supposed demand are out-of-date and make assumptions about energy consumption that are unreliable, given energy trends in the last few years, as well as dampened demand as a result of the slow economy. Large-scale infrastructure projects that have damaging effects on natural and cultural environments should be seen as a last resort, after exhaustive efforts are made to conserve energy first. There is the potential to save enormous amounts of energy through energy conservation and programs that educate citizens about (and create incentives for) efficiency. This is the path that must be pursued more aggressively before this project is considered.

**Response:**

See response to comment 150.

**COMMENT #345 COMMENT SOURCE: EMAIL****Name: Check, Terry****Comment:**

I was disappointed, after reading the voluminous draft EIS report, to see little or no attention given to climate change. Despite the lip service given to renewable energy, the fact remains that this line's primary purpose is to distribute coal-produced energy. This further entrenches our reliance on fossil fuels and exacerbates the effects of climate change, at a time when society needs to be working vigorously on options that minimize the consumption of fossil fuels.

**Response:**

See response to comment 171.

**COMMENT #346 COMMENT SOURCE: EMAIL****Name: Check, Terry****Comment:**

I am also concerned that the draft EIS downplays the immediate environmental and health effects of these transmission lines. I have read the testimony of David Carpenter of the State University of New York in Albany about the link between high-powered electricity lines and childhood cancer. This concerns me greatly, given that I have two young children who would be playing in the fields near these lines. The justification to build these lines is based on flimsy evidence and is motivated primarily by profit. The draft EIS should have given more weight

both to the immediate and long-term environmental and health consequences of these transmission lines.

**Response:**

The need for this transmission line has already been established in accordance with state HVTL routing requirements. The Applicant and the state have reviewed potential health impacts from the transmission line, including a request by the state to look at higher operating amperages that could occur in the future. The result of the analysis indicates that electric and magnetic fields will be less than the maximum standards established in other states, and below standards in other countries.

**COMMENT #347 COMMENT SOURCE: LETTER**

**Name: Coulter, Becky**

**Comment:**

Being situated right next to the walking bridge, I am aware of the function of St. John's woods as a place for recreation and respite for people all over the area. The same is true for the Lake Wobegon trail, which I use regularly. The placement of this power line into the refuge areas or along the Lake Wobegon trail would have a highly adverse impact on all those who come for recreation, as well as the involved, activist community living in this area.

**Response:**

The presence of a transmission line would not preclude the current recreational functions of these resources but could create visual impacts. Impacts on recreational resources and visual resources are discussed in Section 7.3.2 and potential mitigation is discussed in Section 7.3.3.

**COMMENT #348 COMMENT SOURCE: EMAIL**

**Name: Didier, Jean**

**Comment:**

The DEIS carefully explains that the noise impact of the project is greatly dependent on the existing ambient sound level in the subject area (pg 7-7). But it does not indicate the ambient levels on the respective route segments. While it is generally not the function of the EIS to evaluate the impact of the Project on individual property parcels, some differentiation of the ambient sound levels by route segment is needed for meaningful assessment of the impact of the Project on noise and to avoid erroneous conclusions. Additionally, since this is a question as to whether the Project will be in compliance with Minnesota Rules restriction on noise levels, it would seem that issues of application to particular properties would also be appropriate.

**Response:**

The transmission line and associated infrastructure will be constructed and operated in compliance with Minnesota noise rules.

**COMMENT #349 COMMENT SOURCE: EMAIL****Name: Didier, Jean****Comment:**

The DEIS concludes that "Property values for parcels of land crossed by or adjacent to the proposed transmission line are not anticipated to significantly change." Pg 7-14. This conclusion is unsubstantiated and in fact contradictory to the support it cites: A literature review was conducted to determine if conclusive impact assessments can be made. These studies included appraiser studies, attitudinal studies, and statistical analyses. None of the studies reviewed during this research provided conclusive findings which could isolate the impacts of transmission lines on property values (emphasis added). Property values for parcels of land crossed by or adjacent to the proposed transmission line are not anticipated to significantly change. Literature reviews indicate that although value losses up to 20 percent have been reported (EPRI, 2003), study results are highly dependent on methodology and location (emphasis added) pages 7-14:7-14. From this the DEIS concludes that the Project is not anticipated to significantly affect property values? This makes no sense.

**Response:**

The DEIS was developed by using the most currently available information to analyze property values. According to recent research conducted on the effects of transmission lines on property value, it is not expected that property values as a whole would change significantly. However, individual properties could have impacts on value dependent on the improvements on the property and location of the property.

**COMMENT #350 COMMENT SOURCE: EMAIL****Name: Didier, Jean****Comment:**

Route D alternatively addresses above ground and buried lines along the interstate as it moves through and between three towns: Melrose, Albany and Avon. The distance of the buried option in Avon is ten miles, for a total of thirteen buried miles. I assume this is a potential maximum, and not the only distance that may be used. If it is the only distance that may be used, it is objectionable in that it arbitrarily frames the route to make the buried option impossibly expensive. In that case, I ask that shorter options that realistically seek optimal placement of buried segments for appropriate distances along the line to be evaluated.

**Response:**

See response to comment 117.

**COMMENT #351 COMMENT SOURCE: EMAIL****Name: Didier, Jean****Comment:**

As a citizen not trained in medical matters and electricity transmission, I must rely on my governmental representatives to protect me and others from the effects of this line. A quick search of the internet shows me that government websites such as that of the NIH and province of Saskatchewan Canada indicate real health concerns. I ask that the final EIS address these concerns and, as a document from my government, provide honest evaluation of how to protect its citizens.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2, and 7.2 of the Draft EIS.

**COMMENT #352 COMMENT SOURCE: LETTER****Name: Ellingson, Roland****Comment:**

Concern: farm building site, Ottetail Co. Oscar Township. The farm site was established circa 1868. Buildings include renovated house everything current standards including well and sewage system installed 1990's. Barn, substantial building, Quonset, garages. Designing (architectural landscaping) in process to minimize the impact of #94. Property contiguous with the building site includes native grass species and trail marks from the Red River Ox Cart trail, trail Rothsay to Fergus Falls for present markers, neither established at the time of the Ox Cart usage. The buildings and site are a vital part of the development of the property. Request this property be accorded respect.

**Response:**

See response to comment 136.

**COMMENT #353 COMMENT SOURCE: WEBSITE****Name: Fredericksen, Janel****Comment:**

The DEIS made available on or about August 31, does not provide an accurate comparison of the Preferred Route and Route A. The Preferred Route data provided for the Fargo - Alexandria portion of the route includes the area from Alexandria to the Bison Substation for the Preferred Route. The data provided for Route A, only goes to the North Dakota border in Southern Wilkin County and does not include the more than 50 miles of route that would continue North on the North Dakota side. So the environmental impacts for the more than 50 miles of route excluded from the study on the North Dakota side have not been taken into consideration.

**Response:**

See response to comment 61.

**COMMENT #354 COMMENT SOURCE: WEBSITE**

**Name: Fredericksen, Janel**

**Comment:**

In addition, once the route reaches North Dakota along the proposed Route A, there are several farmsteads that would be impacted. There is one private airstrip and two helicopter pads immediately adjacent to the east-west portion of the route on the North Dakota side. There is a significant amount of air activity in the area and the proposed transmission line poses a significant threat to the safety of those residents and others using that airspace.

**Response:**

See response to comment 53.

**COMMENT #355 COMMENT SOURCE: WEBSITE**

**Name: Fredericksen, Janel**

**Comment:**

The amount of cropland impacted on the North Dakota side is significant. The farmland located along the proposed route is some of the richest farmland in North Dakota and the value per acre would be approximately \$4,000.00. The proposed line would impact the production of vital small grains, corn and sugar beets.

**Response:**

See response to comment 61.

**COMMENT #356 COMMENT SOURCE: WEBSITE**

**Name: Fredericksen, Janel**

**Comment:**

The DEIS does not compare apples to apples in the data it provides for the two routes. The negative impact on the environment and the health, safety and welfare of those along Route A, all of proposed Route A, must be considered. When compared completely, the greater environmental impact cannot be justified.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives by evaluating the affected environment and potential impacts on resources by each alternative within the defined project limits. The entire EIS record including comments will be passed on to the administrative law judge. The final route selected may consist of segments from more than one proposed route.

**COMMENT #357 COMMENT SOURCE: EMAIL****Name: Hansel-Welch, Aric & Nicky****Comment:**

I again question why a different alternative was not considered past between Alexandria and Fergus Falls. There are other possibilities that both existing corridors are much more direct with less corners and jogs than the alternative route submitted by CapX. I had suggested this in my comments on the scope of the EIS and will continue to do so.

**Response:**

See response to comment 205.

**COMMENT #358 COMMENT SOURCE: EMAIL****Name: Hansel-Welch, Aric & Nicky****Comment:**

There is also an error on page 5-41 on the description of the location of the Hansel Lake Rest Area. The rest area is located 0.4 miles southeast of the intersection of Ottertail Co. Hwy 35 and I94 (or exit at mile marker 67), not 0.4 miles from the US Hwy 59 intersection with I94.

**Response:**

The text in the DEIS has been changed and included in the FEIS.

**COMMENT #359 COMMENT SOURCE: EMAIL****Name: Hansel-Welch, Aric & Nicky****Comment:**

This area from Alexandria to Fargo is an extremely important area in the central flyway for migratory waterfowl and the information provided in the draft document regarding migratory bird impacts of the transmission line is rather cursory. I would suggest including impacts of electromagnetic fields on biology and physiology of birds. There is a lot of scientific literature in the area of impacts of bird strikes on transmission lines and I think it would be beneficial for those considering the impacts to have specific scientific citations supporting the assertions in the document. The claim in the document is that the impact would be minimal, but there is not much evidence presented to support that claim (i.e. no citations or population modeling done to show if x percent of the local populations is displace or killed by the line, what would the population impacts be?). These claims maybe true, but more evidence needs to be presented to support them. Those with a scientific background reviewing the document will want additional supporting data and it should be up to the preparer of the document to produce that information.

**Response:**

See response to comment 84.

**COMMENT #360 COMMENT SOURCE: EMAIL**

**Name: Heim, Kathleen**

**Comment:**

My major crops are corn, soybeans, wheat, alfalfa and meadow hay. We must keep this in production for now and the future.

**Response:**

See response to comment 111.

**COMMENT #361 COMMENT SOURCE: EMAIL**

**Name: Heim, Kathleen**

**Comment:**

Now the human impact of living and working near the huge power lines would be a problem and hazard on this property.

**Response:**

See response to comment 33.

**COMMENT #362 COMMENT SOURCE: EMAIL**

**Name: Heim, Kenneth**

**Comment:**

This relates to a recorded Century Farm owned since 1873 by the Heim Family. Tax value of property after power lines are run through it showing loss to use over 20-100 years? Property values both for farming and non-farming use of land with power line over it to understand how much financially this could impact us considering this could be in family for many-many years.

**Response:**

See response to comment 142.

**COMMENT #363 COMMENT SOURCE: EMAIL**

**Name: Heim, Kenneth**

**Comment:**

Who is going to determine the value of the land taken from the owner by easement? This is not something we desire for something we have cherished and watched over for so many years. Projection for cost to land for having easement assuming 25, 50, 100+ years ownership in for something being handed down generation after generation.

**Response:**

See response to comment 20.

**COMMENT #364 COMMENT SOURCE: EMAIL**

**Name: Heim, Kenneth**

**Comment:**

Human impact living, working and enjoying the property under the power lines?

**Response:**

See response to comment 33.

**COMMENT #365 COMMENT SOURCE: EMAIL**

**Name: Heim, Kenneth**

**Comment:**

Will the power lines ever go through middle of property or will it always be on edge between land owners?

**Response:**

The Applicant will make an effort to avoid crossing the middle of properties. The preference is to follow section lines, field lines, and other linear features to minimize disruption to individual property owners.

**COMMENT #366 COMMENT SOURCE: EMAIL**

**Name: Heim, Kenneth**

**Comment:**

Does Century Farm status matter to people choosing path?

**Response:**

See response to comment 136.

**COMMENT #367 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

If these power lines run through our property we will not be able to utilize our plans of organic farming or a daycare.

**Response:**

The presence of a transmission line does not necessarily preclude organic farming or daycare land uses.

**COMMENT #368 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

We cannot even put in an irrigation system to water the crops.

**Response:**

See response to comment 105.

**COMMENT #369 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

Our land would not be of use for what we purchased it for. We also would not be able to sell for what we purchased it for because of the lower property values that come with power lines on your property.

**Response:**

Comment noted.

**COMMENT #370 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

The DEIS has failed to reference proliferation data. In Preferred Route and Route A- the proliferation is excessive and causes much harm to our way of life and environment. This needs to be included in your final EIS.

**Response:**

A table comparing the extent to which the routes follow existing right-of-way has been included in the FEIS.

**COMMENT #371 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

Please give me detailed documentation why an item as important as under grounding was not given consideration for a special Advisory Task Force.

**Response:**

OES convened an Advisory Task Force (ATF). One of the routes identified by the ATF, Route D, has a number of underground components. The underground sections that were proposed by the ATF were developed to mitigate impacts in areas where it would be difficult to place an

overhead transmission line. Chapter 7 of the Draft EIS includes a more detailed discussion of each of the resources that may be impacted by underground construction. In addition, the Applicant submitted a detailed special study on underground transmission options.

**COMMENT #372 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

With two small children I have a right to expect that your values of amperage stated is accurate. Higher amperage means my children may be exposed to higher EMF's. Please give me an explanation to why your amperage could be several times higher than what you stated. I have no experience in power line transmissions so please explain in laymen terms why it is OK to have values stated that could be as high as 1200 to 1500 MVA when we were originally told somewhere around 264 in the DEIS.

**Response:**

See response to comment 33.

**COMMENT #373 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

Route D (I-94) with under grounding would be the route that would cause the least amount of harm. This is the route that I favor.

**Response:**

Comment noted.

**COMMENT #374 COMMENT SOURCE: LETTER**

**Name: Heinen, David & Robin**

**Comment:**

The towers supporting CAPX2020 transmission line are 175-foot, galvanized, single pole structures. The galvanized, single poles of the tangent structures range 3-4 feet diameter, with corner structures ranging 4-5 feet in diameter. The right-of-way, which measures 150 feet in width, is frequently cleared of all vegetation except grass or other low-growing plants. Depending upon topography, forests, and other factors a transmission line may be visible from a distance of three miles or more. In fact, those who study the effect of new transmission lines on views commonly begin their analysis three miles out. Such a scene detracts from the scenery of an otherwise natural view in a rural, undisturbed environment.

**Response:**

Aesthetic impacts are discussed in Section 5.3.2, 6.3.2, and 7.3.2 of the Draft EIS.

**COMMENT #375 COMMENT SOURCE: LETTER****Name: Heinen, David & Robin****Comment:**

Several studies indicate a negative impact from HVTL's on Property Values. The changes can reflect a range between a 6.3 - 53.8% reduction in the value of property's adjacent to an HVTL. In an article published in the Journal of Real Estate Research, appraisers indicated residential property values can be affected to varying degrees by transmission lines and that market values of these properties is, on average, 10.01% lower than the market values for comparable properties not subject to the influence of HVTL's.

**Response:**

Comment noted.

**COMMENT #376 COMMENT SOURCE: LETTER****Name: Heinen, David & Robin****Comment:**

There is a growing consensus that the electromagnetic field (EMF) emitted by transmission lines pose a genuine health threat. In 2006 the State of Maryland concluded: "Studies have consistently shown increased risk for childhood leukemia associated with ELF magnetic fields..." A 2005 study conducted in England and Wales showed that one out of every hundred or so cases of childhood leukemia occurring within 2,000 feet of a high-voltage.

**Response:**

See response to comment 33.

**COMMENT #377 COMMENT SOURCE: LETTER****Name: Heinen, David & Robin****Comment:**

Dr. David Carpenter, Director, Institute for Health and the Environment at the University of Albany, New York, an expert in the areas of EMF's, in a testimony to the State of Minnesota, Public Utilities Commission, indicated a STATISTICALLY SIGNIFICANT association between EMF/ELF and Childhood Leukemia. In adults, Dr. Carpenter references evidence for a relation between EMF exposure and adult cancer and neurodegenerative diseases is "sufficiently strong".

**Response:**

See responses to comment 33 and 198.

**COMMENT #378 COMMENT SOURCE: LETTER****Name: Heinen, David & Robin****Comment:**

Due to the rural nature of the proposed Preferred and Alternate A “North” Routes, agricultural operations will undoubtedly be significantly affected. Primary agricultural production crops include corn, soybeans, oats, wheat, sugar beets, and alfalfa/hay. Primary livestock found within the Preferred and Alternate A “North” Routes include dairy cattle, beef cattle, sheep, swine and poultry. The permanent impacts associated include pole placement, while temporary impacts during construction may include soil compaction, disruption of agricultural practices (e.g., center pivot irrigation) and crop damages within the right-of way at proposed structure location, locations of permanent access, and other work areas. While farmers will be compensated for their loss of productive agricultural land, the loss of productive land, in and of itself, can have lasting effects on a farm’s overall production in future years. There are also “nuisance effects”, such as the induced charges in electric fence lines and vehicles building electric charges directly under HVTL’s. In addition, CAPX2020 does not recommend refueling of vehicles directly under HVTL’s.

**Response:**

The final alignment has not been selected at this time. The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives. After the public hearings, the Administrative Law Judge (ALJ) makes a recommendation on a final route. The PUC will develop a route permit for a final route based on the ALJ's recommendation. The utility has prepared an Agricultural Impact Mitigation Plan that further addresses options for mitigation of farm impacts, including a compensation schedule for loss of agricultural production. A copy of this plan was included in the DEIS. Stray voltage is addressed in Sections 5.2, 6.2, and 7.2 of the DEIS.

**COMMENT #379 COMMENT SOURCE: LETTER****Name: Heinen, David & Robin****Comment:**

The use of under-grounding or ‘burying’ of HVTL’s, especially in geographic areas with sensitive environments and ecologies or scenic viewpoints has been utilized in other projects. A HVTL project in Chisago County utilized HVTL under-grounding to avoid the sensitive and scenic areas of the St. Croix River. Under the State of Connecticut Law, new construction of HVTL’s in urban areas must utilize under-grounding to minimize affects on human settlements and reduce EMF exposure in buffer zones near residential areas, schools and playgrounds. Technologies, such as under-ground “Super-conductors”, provide for high-efficiency, high-voltage electrical transmission, 0% EMF exposure and minimize required rights-of-way (25 feet vs.150 feet). Additionally, under-grounding offers minimal impact on area aesthetics and avoids the contentious battles between citizens, townships and cities pertaining to HVTL placements.

The utilization of undergrounding should be considered, at least for short-distances in problematic areas, as part of the Melrose to South St. Cloud portion of the CAPX2020 Fargo to St. Cloud HVTL project.

**Response:**

Undergrounding was considered based on recommendations from the ATF on Route D at three locations as shown on Figure 1-2 ATF Recommended Routes in the Draft EIS.

**COMMENT #380 COMMENT SOURCE: EMAIL**

**Name: Herdering, Tom**

**Comment:**

We would appreciate any alternative considerations other than County Road 17 as the main route for the lines.

**Response:**

Comment noted.

**COMMENT #381 COMMENT SOURCE: EMAIL**

**Name: Herdering, Tom**

**Comment:**

We currently farm almost half of our crops along County Road 17 which would affect our business tremendously. With this line being placed on crop land less feed would be able to be processed and we would end up buying more of our feed. The cost of feed is always rising which we would have to pay for.

**Response:**

Agricultural land uses can continue within a transmission line easement.

**COMMENT #382 COMMENT SOURCE: EMAIL**

**Name: Herdering, Tom**

**Comment:**

The farm equipment will constantly have to go around the poles making it less profitable by losing time and having more fuel costs. As these lines are being placed in the ground a lot of the crop around it will be destroyed by compaction not just the pole itself which would take away more of our valuable crop land. Some of these fields also have drain tile in which should not be disturbed. We sometimes irrigate this land and spray the crops. How will our irrigator get around these poles without rusting them with water? We do not want to lose valuable crop land when there is a chance these lines could be placed on swamp land rather than workable fields.

**Response:**

See responses to comments 111 and 117. In addition, the transmission line poles are self-weathering steel, and have been designed to withstand the elements. Irrigation water would not significantly impact the durability of these poles.

**COMMENT #383 COMMENT SOURCE: EMAIL**

**Name: Herdering, Tom**

**Comment:**

The electro magnetic field effects animals and will again affect our profitability.

**Response:**

See response to comment 68.

**COMMENT #384 COMMENT SOURCE: EMAIL**

**Name: Herdering, Tom**

**Comment:**

If these transmission lines are placed on private property we feel a payment to the land owner should be received each year to compensate for any inconveniences and loss of valuable crop land. Also we feel that any disturbed land should be placed back the way it was before being tampered with. If the land had crops in or could have been planted in at the time we feel we should be compensated for it at that time.

**Response:**

Comment noted. With regard to agricultural impacts, please see response to comment 111.

**COMMENT #385 COMMENT SOURCE: EMAIL**

**Name: Huls, John**

**Comment:**

This is to encourage and promote the location of the powerline along the southern proposed route along interstate 94 and not along the northern route as proposed. I own property on the proposed northern and along highway 94. It makes much more sense to locate along either the highway or utilize the southern route as proposed.

**Response:**

Comment noted.

**COMMENT #386 COMMENT SOURCE: EMAIL****Name: Huls, John****Comment:**

My private airstrip will be directly and negatively be impacted. My airstrip is registered with the Mn aeronautics department. It has been located on my property and utilized by me since 2003. Construction of a powerline would render my airstrip unusable.

**Response:**

The dataset used in the Draft EIS applied information from the FAA source. There are no state or federal regulations for private use airports. Private use airports are a land use resource and are considered equally with other land uses resources for the purposes of this EIS. When a final alignment is selected the applicant can meet with potential airport representatives to mitigate local impacts and solicit suggestions on how to work together details of final pole placement. Applicants will comply with federal and state regulations for public use airports.

**COMMENT #387 COMMENT SOURCE: EMAIL****Name: Jacobson, Gregg****Comment:**

Our intent for future expansion of this facility in Albany is to the South and have it plotted on our site plans issued to the state. Not only does this limit our expansion plans but would limit our present operations. I have included an aerial photo showing the proposed route E and the impact it would have on our operations.

**Response:**

See response to comment 121.

**COMMENT #388 COMMENT SOURCE: LETTER****Name: Johannes, Pam & Kevin****Comment:**

I strongly oppose the North "Preferred & Alternate Route A". Negative effects on ecology and environment, including natural areas and wildlife (ex. Shepards Lake, St. Wendel Swamp, which was given to the DNR from Stearns County. A rare swamp with unusual cold water bog and home to rare plants and numerous lady slippers.) And other ecologically sensitive wetlands and areas.

**Response:**

Comment noted.

**COMMENT #389 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

Traversing of agricultural property affecting livelihoods and jeopardizing the heritage, preservations and integrity of family farms, including numerous "Century" and generational farms.

**Response:**

See response to comment 136.

**COMMENT #390 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

Electromagnetic fields may contribute to childhood and adult Leukemia, adult brain cancer, Lou Gehrig's disease, miscarriages and worsening of immune-related diseases.

**Response:**

See response to comment 279.

**COMMENT #391 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

Minnesota Statute 216E.03 requires first consideration of potential routes that would use or parallel existing railroad and highway rights-of-way...such as the I-94 corridor. 42% of the north routes approximately 39 miles creates new rights-of-way via private parcel lines, a clear departure from Minnesota's policy on non-proliferation. Between Freeport and St. Cloud the proposed routes deviates dramatically and cut across rural and agricultural land.

**Response:**

Refer to Tables 3.2.2 and 3.2.3 in the FEIS for a presentation of corridor sharing with roadways, transmission lines, railroads etc.

**COMMENT #392 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

The line in that area could be buried under the lakes with no emissions of EMFs.

**Response:**

Comment noted.

**COMMENT #393 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

Spoiling pristine, rural, agricultural century farms and ecologically sensitive wetlands just doesn't make sense. The I-94 corridor is already a spoiled view with the freeway itself, numerous billboards, traffic, turkey barns, and etc.

**Response:**

Comment noted.

**COMMENT #394 COMMENT SOURCE: LETTER**

**Name: Johannes, Pam & Kevin**

**Comment:**

"Right to Farm" ordinances Stearns County's agricultural development and land use ordinances are some of the most restrictive in the state of Minnesota. Stearns County has expressed the importance of open space and farmland preservation through their comprehensive planning initiatives.

**Response:**

See response to comment 157.

**COMMENT #395 COMMENT SOURCE: EMAIL**

**Name: Kalthoff, Ron & Karina**

**Comment:**

Overhead power lines that come across residential and agricultural properties will decrease our property values.

**Response:**

Comment noted.

**COMMENT #396 COMMENT SOURCE: EMAIL**

**Name: Kalthoff, Ron & Karina**

**Comment:**

Overhead power lines that come across residential and agricultural properties will cause negative impacts on the environment and our own health.

**Response:**

Public Health and Safety is discussed in Sections 5.2, 6.2 and 7.2 of the Draft EIS.

**COMMENT #397 COMMENT SOURCE: EMAIL**

**Name: Kalthoff, Ron & Karina**

**Comment:**

I would favor the proposed plan of having the power line follow Interstate 94. Go underground through places like the Albany Golf Course. Having a golf course dug up for one year to do the installation is a small impact versus having it run across the rural areas where we, as property owners, have to deal with the negative impacts of above ground, high voltage lines.

**Response:**

Comment noted.

**COMMENT #398 COMMENT SOURCE: EMAIL**

**Name: Kaufman, Sandra**

**Comment:**

I am a former resident from the LeRoy Heim Family Homestead which is noted in the Stearns County Historical Records as a Century Farm. I still have a vested interested in this property since I am noted as one of the trustees of this estate.

**Response:**

See response to comment 136.

**COMMENT #399 COMMENT SOURCE: EMAIL**

**Name: Kaufman, Sandra**

**Comment:**

A route along an interstate seems more suitable and less costly for the project & customers.

**Response:**

Comment noted.

**COMMENT #400 COMMENT SOURCE: EMAIL**

**Name: Kaufman, Sandra**

**Comment:**

Waterfowl typically are more susceptible to transmission line collision, especially if the transmission line is placed between agricultural fields that serve as feeding areas and wetlands or open water which serve as resting areas. In these areas, it is likely that waterfowl and other birds will be traveling between different habitats, potentially increasing the likelihood of avian conflicts with the transmission line. Some species depend on large areas of undisturbed habitat and their survivability decreases as fragmentation increases.

**Response:**

See response to comment 31.

**COMMENT #401 COMMENT SOURCE: EMAIL**

**Name: Kaufman, Sandra**

**Comment:**

It is the place we call home for us as well as the wildlife we enjoy photographing without the hazards of electric magnetic fields overhead and the possibility of stray voltages impacting anything.

**Response:**

Comment noted.

**COMMENT #402 COMMENT SOURCE: EMAIL**

**Name: Kroll, Thomas**

**Comment:**

Which category was used in table 7.1.4 for Saint John's Abbey land which has all of our 2,740 acres zoned in Stearns County as Educational/Ecclesiastical (EE)?

**Response:**

The St. John's Abbey acreage is under the commercial/industrial land use category in the DEIS. A footnote has been included on Table 3.6-1 in the FEIS to clarify this inclusion.

**COMMENT #403 COMMENT SOURCE: EMAIL**

**Name: Lee, Laurie**

**Comment:**

According to the permit and mapped route, the transmission line would run along the open, East side. Without having seen our property, I am sure you can guess what this would do to the aesthetics of our farm.

**Response:**

The final alignment has not been selected at this time. Once a final alignment is selected the Applicant will work with residents to address potential mitigation measures such as visual screening with vegetation.

**COMMENT #404 COMMENT SOURCE: EMAIL**

**Name:** Lee, Laurie

**Comment:**

My husband and I continue to have concerns about the potential health hazards of such high, continuous currents so near our home. We have read the information provided by CapX2020 about EMF's and done research on our own. We continue to feel there is too much conflicting information on both sides of the issue to make a decision either way.

**Response:**

Comment noted.

**COMMENT #405 COMMENT SOURCE: EMAIL**

**Name:** Lee, Laurie

**Comment:**

There is a secondary route proposed in the permit that would send the transmission line south of I-94 instead of by our house. Is this still an option? Could this be a better option?

**Response:**

Multiple alignments are under consideration. The final alignment has not been selected at this time. Once the route is approved the project will go through a phase of final design and property acquisition.

**COMMENT #406 COMMENT SOURCE: LETTER**

**Name:** M. (illegible), Scott

**Comment:**

I am in opposition to Route D because destruction of an entire community. The Route D would remove many homes from our community. The business development in our community would end.

**Response:**

Comment noted.

**COMMENT #407 COMMENT SOURCE: LETTER**

**Name:** M. (illegible), Scott

**Comment:**

The wildlife that use the lakes, loons, geese, eagles, fish would be negatively affected.

**Response:**

Comment noted.

**COMMENT #408 COMMENT SOURCE: LETTER**

**Name: M. (illegible), Scott**

**Comment:**

Stray voltage - many houses and residents with children would be too close to the lines to be safe.

**Response:**

Comment noted.

**COMMENT #409 COMMENT SOURCE: EMAIL**

**Name: Marschke, Jerry & Jeane**

**Comment:**

We want to encourage that everything be done to keep these power lines on the main I-94 corridor and away from as many residential areas as possible including ours.

**Response:**

Comment noted.

**COMMENT #410 COMMENT SOURCE: EMAIL**

**Name: Marschke, Jerry & Jeane**

**Comment:**

Health reasons are also a concern for us.

**Response:**

Comment noted.

**COMMENT #411 COMMENT SOURCE: EMAIL**

**Name: Marschke, Jerry & Jeane**

**Comment:**

Lake Mary is a family vacation and resort area and these lines would create a negative impact.

**Response:**

See response to comment 70.

**COMMENT #412 COMMENT SOURCE: LETTER**

**Name: Lefebvre, Bob**

**Comment:**

On behalf of the nearly 1,500 dairy farmer members of the Minnesota Milk Producers Association (MMPA), I appreciate the opportunity to comment specifically on the Sauk Centre

to St. Cloud portion of the Fargo to St. Cloud 345kV transmission line. It is our conclusion that the best route, based on the information provided in the DEIS, is “Route D” from Sauk Centre to St. Cloud. As a result, we ask that the project proposers and the OES to utilize Route D and not the existing Preferred Option outlined in the DEIS.

**Response:**

Comment noted.

**COMMENT #413 COMMENT SOURCE: LETTER**

**Name: Lefebvre, Bob**

**Comment:**

The Preferred Option has the potential for presenting another major challenge versus Option D. The presence of stray voltage poses devastating health effects for dairy cows. The DEIS does state that transmission lines can induce stray voltage on a distribution circuit. Regardless, much is unknown about stray voltage and the DEIS does not completely capture the potential negative economic impact to dairy farmers and the local communities. This is especially important since Stearns County is the state’s largest dairy county and it is a top ten dairy county in the United States of America. More specific data on these impacts related to stray voltage and other factors must be gathered and analyzed prior to making a safe, final assessment of these options. The DEIS mainly treats all agriculture as a single category and fails to take into account the total number of dairy cows.

**Response:**

See response to comment 68.

**COMMENT #414 COMMENT SOURCE: LETTER**

**Name: Lefebvre, Bob**

**Comment:**

Milk production declines with a resulting decline in on-farm income. Each dairy cow in the state contributes over \$15,000 annual economic activity, according to the Minnesota Department of Agriculture. This economic activity is vitally important to communities throughout the state and to the state as a whole. Placing the transmission lines along the Preferred Route could present significant economic challenges for dairy farmers and the surrounding communities.

**Response:**

See response to comment 68.

**COMMENT #415 COMMENT SOURCE: LETTER****Name: Lefebvre, Bob****Comment:**

Furthermore, proposed mitigation measures for agricultural activity and prime farmland are incomplete. Again, the DEIS only discusses farmland in a broad sense. No, or very little mitigation is identified regarding dairy cows and the farmers who care for and milk the cows.

**Response:**

See response to comment 68.

**COMMENT #416 COMMENT SOURCE: LETTER****Name: Lefebvre, Bob****Comment:**

There are other reasons why the Underground Option D should become the choice of the project proposers. Trails are minimally impacted as are WPAs, WMAs and SNAs as stated in the DEIS.

**Response:**

Comment noted.

**COMMENT #417 COMMENT SOURCE: EMAIL****Name: Newhall, Lee & Kari****Comment:**

Specifically our concerns relate to the possibility of the OPTION 3 route being selected for the area just west of Alexandria instead of staying on the I94 corridor. OPTION 3 would take the transmission lines right through the north Lake Mary residential area which is where our property is. With this letter, it is our intent to strongly encourage that everything be done to keep these power transmission lines on the main 94 corridor and out of this Lake Mary residential area.

**Response:**

See response to comment 70.

**COMMENT #418 COMMENT SOURCE: EMAIL****Name: Newhall, Lee & Kari****Comment:**

Property owners in this area have paid a significant premium for these properties and there is no doubt that this kind of power transmission line will have significant negative impact on these property values.

**Response:**

Comment noted.

**COMMENT #419 COMMENT SOURCE: EMAIL**

**Name: Newhall, Lee & Kari**

**Comment:**

For health reasons, keeping this kind of current and the resulting EMF away from residential areas makes sense.

**Response:**

Comment noted.

**COMMENT #420 COMMENT SOURCE: EMAIL**

**Name: Newhall, Lee & Kari**

**Comment:**

In addition, this Lake Mary area is a heavy vacation/resort area and this type of power transmission line significantly impacts the natural beauty and sight lines in the area, clearly affecting the attractiveness of this area for vacationers.

**Response:**

See response to comment 70.

**COMMENT #421 COMMENT SOURCE: LETTER**

**Name: Hylla, Scott**

**Comment:**

For clarity's sake, the NoRCA CAPX2020 "North Routes" addressed in this Analysis are defined as the Preferred, Alternate A and Alternate B Routes of the project segment from Sauk Center to St. Cloud. This report is comprised of two sections: 1) A Comparative Analysis of the significant impacts pertaining to the "North Routes" vs. other alternative routes in the Fargo to St. Cloud DEIS. 2) A Commentary of the "North Routes" in the DEIS, including imperative items lacking in the DEIS, clarifications and suggestions. We request that the NoRCA DEIS Analysis and Comment be included in the OES DEIS Public Comments for the Fargo to St. Cloud CAPX2020 Route.

**Response:**

These documents have been e-filed and are in the record.

**COMMENT #422 COMMENT SOURCE: LETTER****Name: O'Neil, Teresa****Comment:**

We would like to address the concerns about the possibilities of the 345 kV transmission line not going the applicants preferred route A, and instead using route E, going southwest out to the interstate 94 using existing railroad track right of way.

**Response:**

Comment noted.

**COMMENT #423 COMMENT SOURCE: LETTER****Name: O'Neil, Teresa****Comment:**

The environmental impact on the wildlife, and wetland area which is home to eagles, hawks, deer, fox, turkey, coyote, sand hill crane, a pair of returning trumpet swans and many migrating waterfowl. The clearing of the needed area for the line would take much of the areas woodland including 100 year oaks, large cotton wood and pines.

**Response:**

Route E is one of multiple alignments in consideration. Potential impacts to fauna are in the Natural Land Resources Section 7.9.2 of the DEIS.

**COMMENT #424 COMMENT SOURCE: LETTER****Name: O'Neil, Teresa****Comment:**

Research shows that EMF's from high voltage lines this close to a dairy farm result in decreases of 5-16.5% milk yield.

**Response:**

See response to comment 68.

**COMMENT #425 COMMENT SOURCE: LETTER****Name: O'Neil, Teresa****Comment:**

Research shows that EMF's from high voltage lines this close to a dairy farm result in decreases of 5-16.5% milk yield and an increase of 4.75% in dry matter intake. Therefore if this alternate route is chosen it will put a family dairy farm out of business.

**Response:**

See response to comment 68.

**COMMENT #426 COMMENT SOURCE: LETTER**

**Name: O'Neil, Teresa**

**Comment:**

We would also like someone to do a house count along this route. The two properties 2583 86th Ave (Richert residence) and 8524 Indigo Rd (Bromenschenkel residence) were incorrectly identified on the route map showing a yellow dot instead of a red dot.

**Response:**

See response to comment 132.

**COMMENT #427 COMMENT SOURCE: LETTER**

**Name: O'Neil, Teresa**

**Comment:**

If the applicants preferred route A is not chosen, we would like to see consideration of the applicants proposed new route area that uses Cty Rd 138 instead of the railroad right of way, which would have much less effect on environmental impact and affect fewer homeowners.

**Response:**

Comment noted.

**COMMENT #428 COMMENT SOURCE: WEBSITE**

**Name: Opatz, Mike**

**Comment:**

I am greatly dismayed that the DEIS is allowed to state that the preferred route would not affect property values in a significant manner. If they are going to make that statement you need to define significant. This appears to just be a strategic move to help the power companies skirt their responsibilities from paying their fair share to the affected property values. The preferred route would cut right through my father's (Claude Opatz) land dividing about 60 acres of woods/swamp from the 80 acres of farm land, buildings, and house. Which would greatly devalue the entire property for a future sale. What about the neighboring property owned by David Ebaugh, there is no way ne is not greatly affected in terms of property values. I understand the need for ample and reliable power, and that the line has to go somewhere, but do the right thing and amend the DEIS regarding the statement on no significant affects on property values.

**Response:**

See response to comment 42.

**COMMENT #429 COMMENT SOURCE: EMAIL****Name: Opitz, Maureen****Comment:**

If the power line ends up being built anywhere near my property, I would like to be assured that I would be compensated for diminished property values. For me, that diminishment is primarily aesthetic and economic. If I can see an eyesore easily from anywhere in my yard, that would make it unlikely that I could sell my house for its current value. If quite a few neighborhood trees must be removed, that would also diminish the value of my property and it seems only fair that I should be recompensed.

**Response:**

See response to comment 20.

**COMMENT #430 COMMENT SOURCE: EMAIL****Name: Restani, Julianne****Comment:**

Collegetown resident: when 94 went in there was vast destruction of homes, property and wetlands. We also said goodbye to quiet living while the sound from vehicles is a near constant roar twenty four hours a day. But 94 went in and we all accepted it. Out of complete and utter FAIRNESS to our community this route must not be considered a serious or viable route.

**Response:**

Comment noted.

**COMMENT #431 COMMENT SOURCE: EMAIL****Name: Rothstein, Janet****Comment:**

From the St Joseph meeting, it is clear that these lines will deteriorate our health.

**Response:**

Comment noted.

**COMMENT #432 COMMENT SOURCE: EMAIL****Name: Rothstein, Janet****Comment:**

Not to mention, our homes, that we work very hard to keep up, will drop in value for a second time.

**Response:**

Comment noted.

**COMMENT #433 COMMENT SOURCE: WEBSITE**

**Name: Rudnicki, Ann**

**Comment:**

My husband and I live on a century farm. This farm has sustained at least 4 generations of a family. It has been in our family for 110 years.

**Response:**

See response to comment 136.

**COMMENT #434 COMMENT SOURCE: WEBSITE**

**Name: Rudnicki, Ann**

**Comment:**

This has been the main source of income for the family for most of those 110 years, usually supporting 2 generations at one time. My husband has been farming all of his life. It would be very sad to see this come to an end. I realize we have to advance with the times but it seems that this particular route would affect many people in our same situation that are living and working on the land as their families have for generations.

**Response:**

Agricultural land uses can continue within a transmission line easement.

**COMMENT #435 COMMENT SOURCE: WEBSITE**

**Name: Rudnicki, Ann**

**Comment:**

I feel that keeping the corridor along 94 many farms can be avoided.

**Response:**

Comment noted.

**COMMENT #436 COMMENT SOURCE: EMAIL**

**Name: Russell, Robert**

**Comment:**

The Avon Hills Important Bird Area includes 70,000+ acres of Avon and Collegeville Townships and parts of St. Joseph, St. Wendell, Farming, and Wakefield Townships and includes all of the St. John's Arboretum, several Federal waterfowl production areas, and two state natural areas. This and Camp Ripley to the north are the two most important hardwood

forest tracts in central Minnesota for avian resources and as such would lose many of their attributes and value from forest fragmentation that such a power line would likely cause. This is one of the most important breeding areas in the state for several species of birds that are on state, Federal, and Minnesota Audubon's species of conservation concern lists. These lists include the Trumpeter Swan (migrant, occasional on ponds adjacent to I-94 at St. John's University), Bald Eagle (nests at south end of St. John's and .4 mile south of I-94 in Albany, other nests may be present in Avon Hills), Wood Thrush (probably breeds at St. John's, recorded in May various years), Cerulean Warbler (breeds), Golden-winged Warbler (may breed at St. John's), Mourning Warbler (breeds), and the Red-shouldered Hawk (2 pairs north of I-94 at St. John's, likely one pair west of I-94 near Lake Hillary where courtship has been documented). Several local breeding species such as Red-shouldered Hawk, American Woodcock, and Common Nighthawk perform spring aerial courtship flights that would risk collision with any towers and transmission lines in their habitat. Migrant species of "special concern" (Minnesota's List of Endangered, Threatened, and Special Concern Species updated 11/13/07) that have been seen in the vicinity of the I-94 corridor include Marbled Godwit, Wilson's Phalarope, Franklin's Gull, and Forster's Tern all found at or flying over the St. John's ponds adjacent to I-94 (south/west side). All of these species are protected by the Migratory Bird Treaty Act. Serious fragmentation that this line would cause would likely increase existing Brown-headed Cowbird nest parasitism and mammalian predation on these and other protected bird species in the Avon Hills. Migratory Birds urges that serious consideration be taken into routing this line to the south or north of the Avon Hills to avoid this very resource-rich landscape. Additional information on the birdlife of the Avon Hills can be provided by me upon request.

**Response:**

A discussion on the Avon Hills IBA has been included in Section 7.9.1 GIS data available for the Avon Hills IBA was used to calculate potential impacts to the site. The Route Option Impact Evaluation Table 7.9-4 has been updated to include the IBA in the FEIS.

**COMMENT #437 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Table 7-1-4 and Table 7.3.2 - The orders of Saint Benedict owns 2740 contiguous acres of land in Stearns County. Route C bisects this property and Route D parallels it. The land is zoned Education/Ecclesiastical by Stearns County. It is not clear to us which zoning category the DEIS used to designate this land. We believe it should be a separate category or in your recreational category with a footnote.

**Response:**

See response to comment 402

**COMMENT #438 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Section 7.1.2 Potential Impacts - Land Use and Zoning (Page 7-9) the discussion of Land Use and Zoning focuses heavily on agricultural land and how the actual land use would not be heavily affected on agricultural lands. We agree. However, forested land is completely converted from its current use and most will likely have no agricultural use or other productive use after the trees are cleared for the line. This section must also address these significant changes for forested land, not just discuss agricultural land. Most of Saint John's land along Route C is very high quality forest over 120 years old and would be eliminated as such if these trees were cleared for transmission line ROW.

**Response:**

The purpose of this EIS is to provide a comparative analysis of the social, economic, and environmental effects of route alternatives by evaluating the affected environment and potential impacts on resources by each alternative within the defined project limits. The affected environment and potential impacts to land based economies including agriculture and forestry are presented Sections 5.7, 6.7 and 7.7 of the DEIS.

**COMMENT #439 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Section 7.3 Recreation and Aesthetic Resources (Page 7-30) This section discusses...Recreational Resources in the project area between Sauk Centre and St. Cloud include: Waterfowl Production Areas (WPAs), Wildlife Management Areas (WMAs), Scientific and Natural Areas (SNAs), (please add State Game Refuge), a State Forest, lakes rivers, local and regional trails.

**Response:**

This text will be added to the FEIS. Additional references to the Game Refuge are in the DEIS on pg. 7-37 and 7-38. Spring Hill Stearns County Park is discussed on p. 7-30, 7-38, and 7-44 of the DEIS.

**COMMENT #440 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Aesthetics (page 7-34) The Collegeville State Game Refuge is again omitted and should be included. We would also suggest that aesthetics of I-94 from about Saint Joseph going west for about 6 miles (which includes Saint John's on both sides of the freeway for about 2 miles)

should be specifically noted. For the 25,000 travelers who pass the area each day, this 6 mile stretch is the most outstanding scenic area for hundreds of miles of I-94. Most importantly, while Saint John's land is not a scenic road easement, there is a precedent in that it has been recognized as a scenic area since the freeway was built in 1977. In 1976, NSP and the State agreed to Saint John's request to rebuild the 69 kV line off the right-of-way visible from I-94. It was moved about 1/3 of a mile north behind the hills. The written intent was to "save and appreciable number of trees" and "improve the aesthetics" for the travelling public on I-94. This move was done at state cost indicating that it was agreed by the state that it was a public benefit. In other circumstances, individual landowners are expected to pay any extra costs of moving from the nearest right-of-way.

**Response:**

The text has been revised and is included on pages 3-31 and 3-33 of the FEIS.

**COMMENT #441 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

7.3.2 Potential Impacts Route C (page 7-37) Route C is similar to the Applicant Preferred Route between Sauk Centre and Avon. (Add - Route C is unlike the Applicant Preferred Route in that it comparatively crosses so much more forest land than Ag land after diverging from the Applicant Preferred route. One WPA, one WMA, one State Game Refuge), and one SNA are within one mile of Route C from Sauk Centre to St. Cloud. Route C crosses the Sauk River, which has carry-in access for non-motorized boaters. East of Albany, the route is adjacent to Pine Lake and Pelican Lake, both of which have boat access. Where the route parallels Interstate 94 it (remove - travels through) (add - bisects) the Colledgeville (St. John's) Game Refuge which is a (delete - large) (add - 2,430 acre) refuge open to firearms deer (delete and bear) hunting during the established seasons, by written permission of the landowner. Saint John's land is also (add - heavily used for outdoor recreation and environmental education. A unique wooden footbridge was installed when the freeway was built to allow a pedestrian connection between Saint John's trails on both sides of the interstate. This bridge also now connects directly to the Wobegon trail. In FY 2010, 6,769 K-12 students plus 4,733 citizens participated in) environmental education events on the land at Saint John's. Thousands of visits to the land (add - were also recorded by the nearly 4,000 college students who attend the College of St. Benedict and Saint John's University. There are thousands of uncounted alumni and guests of Saint John's that visit the land to enjoy the miles of hiking and ski trails and participate in several environmentally focused events. For example, 1,500 people commonly attend the annual Maple Syrup Festival.)

**Response:**

The text has been revised and is included on pages 3-31 and 3-33 of the FEIS.

**COMMENT #442 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Route D (page 7-37) we suggest this section read as follows to better include the facts: Route D is similar to the Applicant Preferred Route between Sauk Centre and Freeport in that both follow the freeway in that segment. Route D is unlike the Applicant Preferred Route between Freeport and St. Joseph in that it continues to follow I-94 except where it leaves the freeway and follows the Wobegon trail ROW for about 3 miles. One WPA, one WMA, one State Game Refuge, and one SNA are within one mile of Route D from Sauk Centre to St. Cloud. Route D crosses the Sauk River twice, which has carry-in access for non-motorized boaters. The Albany Golf Course is within Route D on the north side of Interstate 94. There are two wayside ... south of the areas. (Add - Where the route parallels the Wobegon trail, about ½ mile is adjacent to the Colledgeville (St. John's) Game Refuge which is a 2,430 acre refuge open to firearms deer and bear hunting during the established seasons, by written permission of the landowner. Saint John's land is also heavily used for outdoor recreation and environmental education. A unique wooden footbridge was installed when the freeway was built to allow a pedestrian connection between Saint John' trails on both sides of the interstate. This bridge also now connects directly to the Wobegon trail. In FY 2010, 6,769 K-12 students plus 4,733 citizens participated in environmental education events on the land at Saint John's. Thousands of visits to the land were also recorded by the nearly 4,000 college students who attend the College of St. Benedict and Saint John's University. There are thousands of uncounted alumni and guests of Saint John's that visit the land to enjoy the miles of hiking and ski trials and participate in several environmentally focused events. For example, 1,500 people commonly attend the annual Maple Syrup Festival.)

**Response:**

The text has been revised and is included on pages 3-31 and 3-34 of the FEIS.

**COMMENT #443 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Route D Undergrounding (page 7-37 & 7-38) The undergrounding option ... West of St. Joseph where the option is parallel to the Lake Wobegon Trail, (delete - a small portion) (add - about ½ mile) travels through the Colledgeville (St. John's) Game Refuge which is a (delete) (add - large 2,430 acre) refuge open to firearms deer (delete and bear) hunting during the established seasons, by written permission of the landowner.

**Response:**

The text has been revised and is included on pages 3-31 and 3-35 of the FEIS.

**COMMENT #444 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Trails (page 7-39) Route C (page 7-40) Please add the following: Route C crosses over the unique wooden-covered pedestrian bridge connecting Saint John's trails on both sides of I-94. This bridge also provides a direct connection to the Wobegon trail.

**Response:**

The text has been revised and is included on pages 3-31 and 3-35 of the FEIS.

**COMMENT #445 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Table 7.3.3 (page 7-43) this should be updated to reflect the crossing of the well used wooden I-94 pedestrian bridge. This may require a separate column for "Collegeville (St. John's) Game Refuge."

**Response:**

The pedestrian bridge has been discussed in the trails discussion for Route C in the FEIS. The bridge represents infrastructure that connects trails.

**COMMENT #446 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Scenic Byways (page 7-45 – 7-47) we would also suggest that aesthetics of I-94 from about Saint Joseph going west for about 6 miles (which includes Saint John's on both sides of the freeway for about 2 miles) should be specifically noted. For the 25,000 travelers who pass the area each day, this 6 mile stretch is the most outstanding scenic area for hundreds of miles of I-94. More importantly, while Saint John's land is not a scenic road easement, there is precedent in that it has been recognized as a scenic area since the freeway was built in 1977. In 1976, NSP and the State agreed to Saint John's request to rebuild the 69 KV line off of the right-of-way visible from I-94. It was moved about 1/3 of a mile north behind the hills. The written intent was to "save an appreciable number of trees" and "improve the aesthetics" for the travelling public on I-94. This move was done at state cost indicating that it was agreed by the state that it was a public benefit. In other circumstances, individual landowners are expected to pay any extra costs of moving from the nearest right-of-way.

**Response:**

The text has been revised and is included on page 3-32 of the FEIS.

**COMMENT #447 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

7.6 archeological and historic resources 7.6.2 Potential impacts (page 7-70) - Add - (Saint John's has been located at the same location since 1866. The campus is nestled in a small valley and is surrounded by trees and water. The following are a list of buildings on Saint John's campus that have been registered on the National Register of Historic Places: Quadrangle, Woodworking Shop, Butcher Shop, Smoke House, Luke Hall, Saint Joseph Hall, Wimmer Hall, Guild Hall, Saint Francis House, Saint Gregory House, Simons Hall, Paint Shop, Saint Benet Hall and Archway, Auditorium and Music Hall, Power House and Stack, and Abbey Church. These buildings and many others are historically and culturally significant to Saint John's. For example, Saint Gregory House was originally constructed in 1907 as an infirmary and now serves as residential housing for students. The most prominent building on campus is the Abbey Church and its bell tower. Abbey Church was constructed from 1958 to 1961 and was designed by world-famous architect, Marcel Breuer. Today, the bell tower of Abbey Church serves as a landmark designating the campus in its surroundings of forest and prairie. The campus is 1.2 miles from Route C and therefore any placement of the transmission line would be visible from the campus. A transmission line at the beginning of the valley would be a stark contrast from the current serene, natural setting Saint John's enjoys which is marked only by historically and culturally significant buildings such as the Abbey Church.)

**Response:**

The text has been revised and is included on page 3-37 of the FEIS.

**COMMENT #448 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

7.7 land based economies (page 7-72) 7.7.1 Affected Environment Forestry (page 7-78) We suggest the following underlined language should be added and the stricken language should be removed from this section: The proposed routes and options are located primarily in grassland and cultivated land with some forested areas adjacent to farmsteads, waterways, and within the Colledgeville (St. John's) Game Refuge and MnDNR managed lands. The wooded areas are located primarily on privately held lands. The wooded areas that are privately owned may be selectively cut periodically for firewood, timber, or pulpwood. However, these wooded areas are not necessarily commercial forestry operations. The exception is the 2,740 acres of Saint John's which is widely recognized as a model of sustainable forestry. (This includes the 2,430 acre Colledgeville Game Refuge.) Saint John's not only produces all of the furniture for the campus from its own wood, it has been audited and certified by the international Forest Stewardship Council (FSC) as "well-managed" since 2002. This tract was among the first private tracts in the US to be recognized as sustainably managed by FSC. Saint John's has had a written forest

management plan since 1949. The majority of the forest industry is located within the northeastern portion of the state. Note: much of the hardwood forest industry in MN is located in central MN.

**Response:**

The text has been revised and is included on page 3-32 of the FEIS.

**COMMENT #449 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Tourism (page 7-80) Mining (page 7-80) we suggest an additional category of “Educational Institutions” be added to the Land-Based Economies considerations. The following paragraph should be included in the Affected Environment section for Educational Institutions: Route C is located on an educational institution’s land and Route D parallels the land of the same educational institution. Saint John’s University and the College of Saint Benedict are educational institutions that focus on providing their students an unspoiled rural setting. With 2,740 acres for students to enjoy, the Environmental Studies program offered at Saint John’s University and the College of Saint Benedict is one of the most popular majors at these institutions. The following paragraph should be included in the Potential Impacts section for Educational Institutions: Route C and D have the greatest potential for impact to Educational Institutions. As many students choose Saint John’s University and the College of Saint Benedict for their unspoiled rural setting, the transmission lines have the potential of disturbing the ability of these institutions to attract students. Given the intense focus on environmental studies at the schools, there are certainly issues with disturbing the natural habitat found around this specific educational institution.

**Response:**

Section 3.6-4 of the FEIS includes revised text which discusses the resources potentially affected on the St. John’s University property with respect to Routes C and D.

**COMMENT #450 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

7.7.2 Potential Impacts Forestry (page 7-93 -7-95) the proposed routes and options are located primarily in grassland and cultivated land with some forested areas adjacent to farmsteads, waterways, and within the Colledgeville (St. John’s) Game Refuge and MnDNR managed lands. Forest resources, notably tree stands, are present along the proposed routes. Refer to Table 7.7-12 for the acreage of wooded lands within each ROW for route options between Sauk Centre and St. Cloud. Unlike agricultural land which can continue to be used in the ROW, all forestry operations in the ROW are permanently exterminated. The wooded areas are located primarily

on privately held lands. The wooded areas that are privately owned may be selectively cut periodically for firewood, timber, or pulpwood. However, these wooded areas are not necessarily commercial forestry operations. The exception is the 2,740 acres of Saint John's which is widely recognized as a model of sustainable forestry. Saint John's not only produces all of the furniture for the campus from its own wood, it has been audited and certified by the international Forest Stewardship Council (FSC) as "well managed" since 2002. This tract was among the first private tracts in the US to be recognized as sustainably managed by FSC. Saint John's has had a written forest management plan since 1949. The majority of the forest industry is located within the northeastern portion of the state. NOTE: Much of the hardwood forest industry in MN is located in central MN.

**Response:**

The text has been revised and is included on page 3-38 of the FEIS.

**COMMENT #451 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

We suggest an additional category of "Educational Institutions" be added to the Land-Based Economies considerations. The following paragraph should be included in the Affected Environment section for Educational Institutions: Route C is located on an educational institution's land and Route D parallels the land of the same educational institution. Saint John's University and the College of Saint Benedict are educational institutions that focus on providing their students an unspoiled rural setting. With 2,740 acres for students to enjoy, the Environmental Studies program offered at Saint John's University and the College of Saint Benedict is one of the most popular majors at these institutions. The following paragraph should be included in the Potential Impacts section for Educational Institutions: Route C and D have the greatest potential for impact to Educational Institutions. As many students choose Saint John's University and the College of Saint Benedict for their unspoiled rural setting, the transmission lines have the potential of disturbing the ability of these institutions to attract students. Given the intense focus on environmental studies at the schools, there are certainly issues with disturbing the natural habitat found around this specific educational institution.

**Response:**

See response to comment 449.

**COMMENT #452 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

7.9.1 Affected Environment (Page 7-113) Natural resources evaluated in this section include State Wildlife Management Areas (WMAs), Scientific Natural Areas (SNAs), State Game Refuges, National Wildlife Refuges (NWRs), Waterfowl Production Areas (WPAs),

Conservation Easements, Flora, Fauna, Rare and Unique Natural Resources and Critical Habitat. State WMAs ... Federally owned ... The 2,430 acre Colledgeville Game Refuge is part of the 2,740 acres privately owned by Saint John's. This State Game Refuge was created in 1933 and is unique in that it is entirely private property owned by a single entity. It is also the largest contiguously owned block of "natural land resource" property in all of Stearns County.

**Response:**

The text has been revised and is included on page 3-40 of the FEIS.

**COMMENT #453 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Flora consists of ... Fauna is defined as ... Critical Habitat is the natural environment that supports species. Designated habitat or conservation areas including managed areas such as MnDNR WMAs, USFWS WPAs State Game Refuges, and easements and unmanaged areas including MnDNR designated MCBS biodiversity significance and rare native habitats and communities were analyzed within each route. All of these areas provide habitat for native vegetation, wildlife, and rare and unique resources. The Minnesota County Biological Survey (MCBS) identifies managed and unmanaged areas of significant biodiversity which include significant rare habitats and communities. NOTE: MCBS can be both managed and unmanaged by DNR definition. Most of Saint John's is outstanding quality habitat in the MCBS survey but it is also managed. This same mistake is also present on page 7-116. Note: The Outstanding Quality land identified by the MCBS at Saint John's on the south side of I-94 is the same type of natural vegetative cover found on the north side of I-94. Because the freeway bisected the land in 1977 the north side was left with a smaller unit which was no longer large enough to qualify as a MCBS site even though it has similar qualities. Fauna (page 7-116).

**Response:**

Comment noted.

**COMMENT #454 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Common wildlife species found ... Throughout the area between Sauk Centre and St. Cloud, areas exist where high -quality wildlife habitat occurs naturally or is being managed. Designated habitat or conservation areas including managed areas such as MnDNR WMAs, USFWS WPAs State Game Refuges, and easements and unmanaged other areas including MnDNR designated MCBS biodiversity significance and rare native habitats and communities were analyzed within each route. The MN DNR and the MN Audubon Society have also identified the "Avon Hills" as an Important Bird Area which includes all of Saint John's property.

**Response:**

The text has been revised and is included on page 3-44 of the FEIS

**COMMENT #455 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Flora (Page 7-119) none of the alternatives represent major permanent impacts to vegetation except in those cases where forests are permanently removed to create a right-of-way.

**Response:**

The text has been revised and is included on page 3-44 of the FEIS.

**COMMENT #456 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Rare Unique Natural Resources/Critical Habitat (page 7-120) Route C (page 7-121) One USFWS easement, nine Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, one MN DNR/MN Audubon Important Bird Area, one State Game Refuge, and three Native Plant Communities are crossed by Route C. Route D (page 7-121) One USFWS easement, ten Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, one MN DNR/MN Audubon Important Bird Area, one State Game Refuge, and three Native Plant Communities are crossed by Route D.

**Response:**

The text has been revised and is included on page 3-44 of the FEIS

**COMMENT #457 COMMENT SOURCE: LETTER**

**Name: Russell, Robert**

**Comment:**

Table 7-9-4 this table should be updated to include the DNR Important Bird area acres as well as the State Game Refuge acres as the game refuge acres function similar to USFWS easements.

**Response:**

IBAs are included in the available GIS data for calculating these impacts. The State Game Refuge is discussed in Section 7.9 of the FEIS and the text and included in the Route Option Impact Evaluation Tables.

**COMMENT #458 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Table comments (page 7-126) Route B impacts includes more sensitive resources and easements within its ROW than the Applicant Preferred Routes and Route A. Route C does include any impacts to management areas or conservation easements within its ROW, except for the Colledgeville (St. John's) State Game Refuge where it also impacts an outstanding quality MCBS site.

**Response:**

The text has been revised and is included on page 3-52 and 3-53 of the FEIS.

**COMMENT #459 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Protected species (page 7-127) Table 7.9.8 Protected Species Occurrences for Routes and Options (page 7-128) Route C needs to be updated to include 2 Red-Shouldered Hawk nests used in 2010 within 1,000 feet of the ROW. Nests are confirmed at UTM 0393540, 5049525 and at UTM 0393182, 5049689. Both are in or very near the Colledgeville (St. John's) Game Refuge and are located on the north side of I-94. These nests were both verified by Dr. Marco Restani, St. Cloud State Ornithology Professor. Route C also needs to add a Common Moorhen pair raised a family within 1,000 feet of the ROW within the last 5 years at Saint John's. UTM 0392161, 5049959 for your information, outside of the 1,000 foot area, in the last 24 months Saint John's also has an active eagle nest, Blanding's turtles, additional Red-Shouldered Hawk nest sites, Cerulean warblers (assumed to be nesting). Also 150 Saw-whet owls have been caught and banded in 2010 within 1,500 feet of both routes C and D at Saint John's making this one higher level banding sites nationally. The loons at Saint John's were also tagged by the US Geological Survey this summer to provide long-term data on loons. These were the only loons tagged in MN. [http://www.umesc.usgs.gov/terrestrial/migratory\\_birds/loons/migrations.html](http://www.umesc.usgs.gov/terrestrial/migratory_birds/loons/migrations.html).

**Response:**

Two Red Shouldered Hawks are present within one mile of the proposed route but not within 1,000 foot route. All protected species tables have been updated in the FEIS to include species located within one mile of each alternative and route option.

**COMMENT #460 COMMENT SOURCE: LETTER****Name: Russell, Robert****Comment:**

Rare Unique Natural Resources/Critical Habitat (page 7-131) MCBS area of moderate, high, and outstanding biodiversity significance, and MN DNR listed natural communities are areas known to be capable of supporting rare and unique species. The number of structures placed in these areas could either be avoided or minimized by maximizing the span across them. Where structure placement cannot be avoided in these sensitive communities, special status species associated with these habitats could be affected. This effect on special status species is especially true in forested habitats that will be eliminated as part of the ROW construction and maintenance. The following are notes from MN DNR Ecologist Mike Lee. Mike Lee was a field ecologist for the County Biological Survey that included Saint John's. 18 October 2010 St. Johns Woods, CAPEX power line, and MCBS Biodiversity Significance determination the north end of the St Johns Woods MCBS Site (#47) as delineated in 1997 was defined by the I94 corridor. The portion of the woods northeast of the corridor was not included due to its rather small size when the fragmentation of several home sites along the old Collegeville road were factored in. Despite this modest fragmentation, the woods northeast of the freeway is the same forest type (central mesic hardwood forest) and is otherwise in good ecological condition and provides habitat for red shouldered hawks. I understand that two red shouldered hawk nests were reported northeast of the freeway this past summer. The entire St. Johns Woods complex (both sides of the freeway) is very important habitat for red shouldered hawks. Cerulean warblers have been known to nest south of the freeway. It would not be unexpected that Cerulean warblers use the woods northeast of the freeway and could very well nest there as well. St. Johns Woods is one of the most important areas for breeding Cerulean warblers in the state. Additional clearing of the woods on either side of the freeway would have an impact on the rare birds as well as the significant tract of forest itself. Clearing to the northeast of the freeway would significantly diminish the suitability of the small patch of forest for both rare bird species and other forest interior wildlife, due to loss of wooded acreage (remaining patch too small) and increased edge to forest interior ratio. Michael D. Lee, Plant Ecologist; Minnesota DNR County Biological Survey The following is copied from a DEIS submission sent from Robert Russell, USF&WS Biologist and member of Saint John's Arboretum Advisory Council submitting information for the DEIS as a private citizen.

**Response:**

The text has been revised and is included on page 3-56 of the FEIS.

**COMMENT #461 COMMENT SOURCE: LETTER****Name: Salzer, Arthur & Sharon****Comment:**

Well we are dairy farmers and we also need our land for our livelihood. If they install the power line on our property they will be disturbing our land in which we grow crops for our 150 head of dairy animals and young stock. We will need to purchase additional feed, which can be very costly. I feel our farming operation is very important not only to us but to the people we feed in this country. If we continue to take profitable agricultural land for this use we also will be looking for our food in other ways such as importing. Our small communities survive off the agriculture.

**Response:**

Agricultural land uses can continue within a transmission line easement. Property owners retain ownership of the land and may continue to use the land around transmission structures.

**COMMENT #462 COMMENT SOURCE: LETTER****Name: Salzer, Arthur & Sharon****Comment:**

We are also very much concerned that we will have stray voltage. We currently have a blocker on our line for stray voltage and we know what a headache stray voltage is and the toll it takes on your animals and the expense you have with veterinary bills, etc.

**Response:**

Stray Voltage is discussed in Sections 5.2, 6.2, and 7.2 of the Draft EIS.

**COMMENT #463 COMMENT SOURCE: LETTER****Name: Salzer, Arthur & Sharon****Comment:**

We have a DNR protected pond on part of our property. We also know wildlife can adapt better than our dairy animals to these types of issues.

**Response:**

Comment noted.

**COMMENT #465 COMMENT SOURCE: EMAIL****Name: Scherer, James****Comment:**

This line is a big concern to the production and health of my animals. It affect the quality of the product we sell. I was told the magnetic field around it was 600 meters. One half a volt of stray voltage causes problems on a dairy farm.

**Response:**

Stray voltage is discussed in Sections 5.2, 6.2 and 7.2 of the DEIS.

**COMMENT #464 COMMENT SOURCE: LETTER****Name: Salzer, Arthur & Sharon****Comment:**

We feel the route should follow I-94 and leave our profitable farm land alone, after all this is our living just like any business, such as the golf course.

**Response:**

Comment noted.

**COMMENT #466 COMMENT SOURCE: WEBSITE****Name: Schindele, Ken****Comment:**

After reading the draft EIS for this project, I am concerned that the impact of sound has not been properly addressed. The statements I found simply said sound would not be a factor, and I disagree with that comment. While searching for an apartment in the Minneapolis area, my neighbor noticed a constant humming noise under an existing power line near the apartment building. Because of that noise, she elected to look elsewhere. Next to my house, I have a transformer box that makes a noticeable humming noise all the time. I can only imagine how much noise would come from a 345 kV Transmission line. And that noise would increase when the line is increased to a second set in the future. My house is very near the proposed primary and alternate routes, and I definitely do not want to live with a constant humming noise overhead. I would like to see the EIS address the issue of noise: how loud, how many hours per day, able to hear it from how far away, and the impact it would have on my quality of life and ability to sell my home in the future.

**Response:**

The noise from the proposed project has been modeled and shown to be just noticeable within 75' of the structures and at night, when lower ambient noise levels exist. Outside of these distances (500-1,000') the coronal noise made by the power lines should be lower than the ambient noise produced by wind, weather and wildlife. As to the tonal nature of the noise,

Minnesota does not regulate or share guidance on frequency related noise (“humming”). Therefore, just because a certain tone is perceived, it does not mean it is automatically out of compliance. Only over-all sound pressure level of the noise is written within the noise guidance, not tonality. Regardless, the project would be constructed and operated in accordance with Minnesota noise rules.

**COMMENT #467 COMMENT SOURCE: WEBSITE**

**Name: Schindele, Ken**

**Comment:**

Using an alternate route would resolve my concerns. In the comparison charts, other routes appear to have less environmental impact than those chosen as the primary and alternate by the power company. Noise from automobiles would likely overshadow noise from the transmission lines, so I suggest using existing corridors along roadways, such as I-94.

**Response:**

Comment noted.

**COMMENT #468 COMMENT SOURCE: WEBSITE**

**Name: Schlough, Michael**

**Comment:**

I strongly disagree that the property values would not be significantly affected by these power lines. If this line goes through I will likely take a tremendous loss in the marketable value of my property.

**Response:**

Comment noted.

**COMMENT #469 COMMENT SOURCE: WEBSITE**

**Name: Schlough, Michael**

**Comment:**

The area is full of productive agricultural land, and unique wildlife wetlands that are relatively untouched.

**Response:**

Comment noted.

**COMMENT #470 COMMENT SOURCE: WEBSITE**

**Name: Schlough, Michael**

**Comment:**

The visual aesthetics within the open landscapes would be significantly impacted.

**Response:**

Comment noted.

**COMMENT #471 COMMENT SOURCE: WEBSITE**

**Name: Schlough, Michael**

**Comment:**

Select a route that follows an existing route of either a power line or major roadway -- Hwy 23, I-94, existing power corridors. Don't disturb more untouched land.

**Response:**

Comment noted.

**COMMENT #472 COMMENT SOURCE: LETTER**

**Name: Schmitt, Brent**

**Comment:**

Proliferation needs to be closely evaluated, analyzed and compared on the DEIS. Regarding the Preferred route from the eastern end of Albany township to the south east end of Brockway township and into St. Wendel Township and regarding the Alternate Route A from mid Holding township to the Southeast end of Brockway township and into St. Wendel Township, the routes are creating new corridors and more instances of Proliferation. Exhibit B. The portion of these two routes I am speaking of represents 14.5 miles and 7 miles for the Preferred and the alternate route, respectively. Exhibit A. Of the 14.5 miles on the Preferred Route, 10.75 or 74.1% of the total miles are creating new corridors and is taking out forests, wetlands as well as farm fields. I challenge the DEIS' statement that there are areas where it is affecting fields only. On the areas where it is affecting fields (especially in Avon Township) there are critical strips of trees and other wooded plants that create safe traveling cover for wildlife to utilize. These must be the areas the DEIS is referencing. Of the 7 miles on Alternate Route A, 6.75 or 96.4% of the total miles are creating new corridors. Where the aforementioned portions of the Preferred Route and the Alternate Route A traverse the land, It is negligently creating new corridors at the cost of Forest, wetlands, farmland, and critical wildlife habitat areas. This is exactly what the Policy on Non-Proliferation is designed to protect. I am certain that the issue of proliferation is the reason why people, in this particular area, have banded together and will continue to do so.

**Response:**

See response to comment 370.

**COMMENT #473 COMMENT SOURCE: LETTER**

**Name: Schmitt, Brent**

**Comment:**

Alternatives that would better utilize and follow preexisting corridors and roads would be I-94 (D, E, F, G or H). Any options that are not creating more areas of new proliferation will better follow the established policy and law for Non-Proliferation.

**Response:**

A table comparing the extent to which the routes follow existing rights of way has been included in the FEIS.

**COMMENT #474 COMMENT SOURCE: EMAIL**

**Name: Schwalbe, Shirley**

**Comment:**

My concern is for my son & his wife & 2 small children. They bought some land from us 9 years ago. Built a house, married, & now have 2 small children. They have put all their work & hopes in their home & family. If this route is chosen, they feel they would have to move for their children's safety.

**Response:**

Comment noted.

**COMMENT #475 COMMENT SOURCE: EMAIL**

**Name: Schmid, Rita**

**Comment:**

Now you people want to put this eyesore of a project thru our neighborhood.

**Response:**

Comment noted.

**COMMENT #476 COMMENT SOURCE: EMAIL**

**Name: Schmid, Rita**

**Comment:**

Please reconsider the preferred route that runs north of Avon or alternate route that runs south of Avon.

**Response:**

Comment noted.

**COMMENT #477 COMMENT SOURCE: EMAIL**

**Name: Stich, Wayne**

**Comment:**

I have a century farm that has been in our family since 1890, my concern in that is the treatment of established woodlands of oak trees that are surrounding our buildings. I would hope that consideration on these routes are looking for least destruction on these resources and not cut them just to get a straight line.

**Response:**

See response to comment 136.

**COMMENT #478 COMMENT SOURCE: EMAIL**

**Name: Stich, Wayne**

**Comment:**

I also have a crude oil pipeline crossing the property with a easement along with a joint venture in a developing wind farm which we are in approximate center, that concerns me about setbacks of turbines from this power line and causing loss of siting and of income from that.

**Response:**

See response to comment 37. In addition, the presence of a transmission line would not necessarily limit wind development opportunities.

**COMMENT #479 COMMENT SOURCE: EMAIL**

**Name: Stich, Wayne**

**Comment:**

How many easements can one piece of property have before one is fighting against another, also causing me to lose a lot of my rights to use my property without having to satisfy 4 companies?

**Response:**

Comment noted.

**COMMENT #480 COMMENT SOURCE: EMAIL**

**Name: Stich, Wayne**

**Comment:**

I hope that the line stays away form our homes for the sake of our health and safety reasons, (noise, magnetic field, stray voltage).

**Response:**

Comment noted.

**COMMENT #481 COMMENT SOURCE: LETTER****Name: Thompson, Richard****Comment:**

I am a landowner in your potential new route for the HVTL. I oppose the powerline on my property because it is very hard to farm around. With the big equipment we have, it is hard to work the ground and spray around the poles. My biggest concern is that it will cross Lesmeister Flying Service's 3 air strips. Dean Lesmeister not only sprays all my crops, but sprays millions of acres for other farmers in our area. It would be a huge loss for our area for him to be unable to perform this service for us.

**Response:**

Permanent impacts to agricultural lands consider the area that will be impacted surrounding each pole. Refer to Sections 5.7.2, 6.7.2, and 7.7.2 for a discussion on potential impacts to agricultural production including pole and center pivot irrigation impacts. Details of final pole placement will be negotiated with property owners during the right-of-way acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on operations can be addressed in negotiations between the utility and the landowner. The final alignment has not been selected at this time. Option 13 in the FEIS was added to avoid the Lesmeister Flying Service.

**COMMENT #482 COMMENT SOURCE: WEBSITE****Name: Waletzko, David****Comment:**

I am well aware of the studies that have been done with EMI and raising five children at my residence with this line in place scares me beyond reason.

**Response:**

Comment noted.

**COMMENT #483 COMMENT SOURCE: WEBSITE****Name: Waletzko, David****Comment:**

This line have a drastic effect on the value and aesthetic pleasure of my property.

**Response:**

Comment noted.

**COMMENT #484 COMMENT SOURCE: WEBSITE**

**Name: Waletzko, David**

**Comment:**

I frequently fly and have landed in the various fields west of my property. This line would also propose very dangerous conditions for me to continue flying.

**Response:**

Details of final pole placement will be negotiated with property owners during the ROW acquisition process that will occur following approval of a route. Mitigations to local impacts, such as the effect of pole placement on landing strips can be addressed in negotiations between the utility and the landowner.

**COMMENT #485 COMMENT SOURCE: WEBSITE**

**Name: Waletzko, David**

**Comment:**

I am pleading that you keep the line in an already established right of way. The I94 corridor is the ONLY place where minimal impact would occur on the health and quality of life for Stearns County residence.

**Response:**

Comment noted.

**COMMENT #486 COMMENT SOURCE: EMAIL**

**Name: Widman, June**

**Comment:**

We are asking that you please do not continue to consider the Stratford option for this project as we and our properties are already carrying our share of the burden in the name of progress.

**Response:**

Comment noted.

**COMMENT #487 COMMENT SOURCE: LETTER**

**Name: Overland, Carol**

**Comment:**

The DEIS does not adequately address impacts of crossing the Bois de Sioux River and the Red River. In a discussion with USFWS, it was brought to my attention that in an area running roughly from where I-94 intersects the borders of Wilkin and Otter Tail Counties, running down I-94 to Alexandria, there are many, many USFWS easements, WMAs, and other interests.

USFWS maps have been entered into the record of DEIS meetings, and should be carefully cross-referenced to assure all USFWS interests are identified.

**Response:**

Both the Bois des Sioux and Red River can be spanned resulting in no direct impacts to the rivers. If at the time of route selection, any federal, state, or local permitting authorities determine that there may be impacts to either of the resources those impacts will be mitigated for in accordance with permitting conditions. Potential impacts to USFWS managed lands are presented in the Natural Land Resources Sections 5.9, 6.9, and 7.9 of the DEIS. Additional coordination with the USFWS will take place after route selection as part of the Section 404 permitting process.

**COMMENT #488 COMMENT SOURCE: LETTER**

**Name: Overland, Carol**

**Comment:**

Scenic Byways are at issue in alternative options for this route, specifically, the King of Trails Scenic byway. This was also an issue in the St. Cloud-Monticello routing docket, where a “mitigation plan” was drafted and dollars were exchanged.

**Response:**

Impacts to the King of Trails Scenic byway are discussed in Section 5.3.2 of the Draft EIS. Additional discussion is provided in the FEIS.

**COMMENT #489 COMMENT SOURCE: LETTER**

**Name: Overland, Carol**

**Comment:**

At least one airport is not on the maps, and the FAA list should be cross-referenced. References were made in the DEIS meetings to “public” airports, but no mention of private airports. Routing consideration must be given to both public and private airports. Exhibit B - FAA listing of private and public airports. The impacts on what should be obvious public airports, such as Alexandria Airport, Sauk Centre, and Elbow Lake Airport are not adequately addressed and impacts may be prohibitive.

**Response:**

Exhibit B was reviewed. The dataset used in the DEIS applied information from the FAA source. There are no state or federal regulations for private use airports. Private use airports are a land use resource and are considered equally with other land use resources for the purposes of this EIS. When a final alignment is selected the applicant can meet with potential airport representatives to mitigate local impacts and solicit suggestions on how to work together details of final pole placement. Applicants will comply with federal and state regulations for public use airports.

**COMMENT #490 COMMENT SOURCE: LETTER****Name: Overland, Carol****Comment:**

In the event of a fault with a high voltage line, fiber optic lines have transferred current into homes causing fires and electrocution with no solution as of an EPRI report in 1997. The EIS should take into consideration risks of fiber-optic. Exhibit C – Fiber Optic Cables in Overhead Transmission Corridors: A State-of-the-Art Review, EPRI Report TR-108959, §2.3.8, p. 2-27.

**Response:**

See response to comment 202.

**COMMENT #491 COMMENT SOURCE: LETTER****Name: Overland, Carol****Comment:**

Undergrounding requires a deeper analysis. The undergrounding report by Power Engineers, Inc., attached as Exhibit D – 345kV Underground Report, Power Engineers, Inc., February 24, 2010 1, reflects that the cost is not so high to be prohibitive as a mitigative effort. The estimate provided is for a distance of 2 miles, and that cost is a lot lower than their Black & Veatch estimates for the Brookings river crossing. Looking at the four undergrounding estimates provided in the CapX dockets<sup>2</sup>, the Power Engineer estimates, while more detailed, are less expensive of those provided by Black & Veatch. The total of short undergrounding segments, when compared with the full transmission line granted the Certificate of Need, from Fargo to Monticello, is a small percentage, although undergrounding at the Red River crossing should be considered as well, raising the potential cost.

**Response:**

The EIS analysis includes information from the undergrounding report provided by the Applicant. Undergrounding has not been eliminated as a potential option for mitigation of impacts, and could be implemented in certain situations, should the route permitting or other permitting processes (e.g. USFWS, USACE) require it.

**COMMENT #492 COMMENT SOURCE: LETTER****Name: Overland, Carol****Comment:**

The DEIS should consider undergrounding in “challenging” areas, such as DOT rest areas, through the isthmus between the lakes, etc. The October 18, 2010 DOT comments note that “If Route D were constructed underground, it would not impair this aspect of the rest area.

**Response:**

Comment noted.

**COMMENT #493 COMMENT SOURCE: LETTER****Name: Overland, Carol****Comment:**

DOT comments regarding impacts and areas to be avoided should be noted carefully to avoid another Brookings late-date routing wake-up call.

**Response:**

Comment noted.

**COMMENT #494 COMMENT SOURCE: LETTER****Name: Overland, Carol****Comment:**

EMF is an important factor to consider, and the full range of EMF of CapX has yet to be fairly acknowledged by the applicants or MOES. • Ampacity - Normal (Continuous) 3347 Amps (2000 MVA) • Load Factor 75% The charts you'll find in the DEIS don't even come close – the loading and the impacts of EMF will be much, much higher. For this reason, it is important to have an engineer testify, or finagle testimony from them regarding the meaning of 3347 Amps “NORMAL” rating loaded at 75%. Here is a chart showing what to expect for the higher end of the scale – please do some independent work on this and correct the misinformation in the DEIS (taken from the Application without vetting): Environmental Review must include a full range of potential current levels.

**Response:**

See response to comment 33.

**COMMENT #495 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

The EIS should address the Applicant's obligation to obtain all required approvals related to aviation safety. Have all public airports been given the opportunity to comment on compatibility of transmission lines with their operations? Please review attached evaluations of proposed HVTL routes in relation to Fergus Falls, Alexandria, Elbow Lake, and Sauk Centre Airports. Modifications in tower height may be necessary to obtain approvals.

**Response:**

Once the final route is selected the Applicant would coordinate with the FAA to address potential modifications of tower heights, if necessary.

**COMMENT #496 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

Mn/DOT believes that significant temporary impacts to traffic operations would occur during construction of the transmission line adjacent to the interstate highway. The EIS should build upon information obtained from previous projects regarding these temporary impacts, and should note that the Applicant Preferred Route would likely have greater impacts on highway traffic during construction than other routes that do not parallel I-94. Applicants should be required to coordinate with Mn/DOT, local highway authorities, the State Patrol, and other appropriate agencies to address the safe flow of traffic during construction, and should bear responsibility for activities necessary to facilitate construction.

**Response:**

Sections 5.4.3, 6.4.3 and 7.4.3 will be updated in the FEIS.

**COMMENT #497 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

Mn/DOT notes that there are several locations along the routes where the proposed transmission line alignment crosses the interstate frequently. While individual crossings generally do not present insurmountable problems, a large number of crossings can be problematic. The EIS should state that a large number of crossings are very likely to cause the Trunk Highway Fund to incur significant additional costs in the future. Accordingly, the Applicant will need to work with Mn/DOT to minimize the number of crossings the trunk highway system, once a route is selected.

**Response:**

The applicant would work with Mn/DOT and other agencies and consider their input during final structure locations, as stated in the mitigation measures sections 5.4.3, 6.4.3 and 7.4.3.

**COMMENT #498 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

The EIS should note that, as mentioned in Mn/DOT's scoping letter, a Safety Rest Area strategic plan is under development that will explore opportunities for eliminating, relocating, or expanding certain rest areas. The presence of a transmission line along I-94 will significantly limit the options available for the location of rest areas, or will require significant expenditure of funds to relocate the transmission line. Mn/DOT notes that the transmission line alignments

depicted in the DEIS appear to avoid placing the transmission line within rest area limits, but the level of detail is insufficient to fully assess the alignments at this time.

**Response:**

Sections 5.3.2, 6.3.2 and 7.3.2 will be updated in the FEIS.

**COMMENT #499 COMMENT SOURCE: LETTER**

**Name: Seykora, David**

**Comment:**

Section 5.3.2 - This section describes the potential impacts of various routes on recreational and aesthetic resources, and the subheading on page 5:35 is a listing of the locations where the proposed HVTL routes would impact scenic byways. The list omits any reference to Option AS-1, which would cross US 75, the King of Trails Scenic Byway, and Option AS-2, which would run alongside US 75, the King of Trails Scenic Byway, for about 2 miles. In addition, when discussing the impact of the proposed project, the DEIS does not quantify the impact of the project will have on amenities such as scenic byways, which makes a meaningful evaluation of mitigation difficult or impossible.

**Response:**

Impacts to the King of Trails Scenic byway are discussed in Section 5.3.2 of the Draft EIS. Additional discussion is provided in the FEIS.

**COMMENT #500 COMMENT SOURCE: LETTER**

**Name: Seykora, David**

**Comment:**

Section 5.3.3 - This section, which addresses mitigation, includes the sentence: "Whenever possible, the proposed transmission lines could be routed alongside existing power lines and section lines, as well as within road, rail, and utility ROWs, to minimize any adverse impacts." (The same sentence is found in sections 6.3.3 and 7.3.3.) While this characterization may in a general sense reflect some circumstances, it is not accurate in many other circumstances. For example, scenic byways are roads that have been designated precisely because of their scenic qualities, and routing a transmission line along these roads magnifies the project's adverse impacts rather than minimizing its adverse impacts. Therefore, this sentence should be eliminated.

**Response:**

The discussion in Sections 5.3.3, 6.3.3 and 7.3.3 of the FEIS will be revised.

**COMMENT #501 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

Section 5.4.2 - Table 5.4.4 lists highway projects that are planned in the study area. Some additional information should be added to this table. The project on MN 29 that involves rehabbing two bridges over 1-94 will also include expansion of MN 29 from two to four lanes from 1-94 to CSAH 28. In addition, Douglas County and the City of Alexandria are actively developing a transportation plan for Alexandria that includes projects in several locations that intersect with the Applicant Preferred Route. These include: (a) proposals to expand MN 27 from two to four lanes on the east side of 1-94; (b) adding an overpass of 1-94 at Nevada Street; and (c) adding an interchange on 1-94 a couple miles east of the MN 29 interchange. The County and City should also be consulted regarding these plans for future transportation projects.

**Response:**

These projects will be added to Table 5.4.4 and to the text in section 5.4.2.

**COMMENT #502 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

Section 7.3.2 - This section describes the potential impacts of various routes on recreational and aesthetic resources, and includes some discussion of highway safety rest areas. The list of potential impacts should include the impact that an overhead line on Route D would have on the Upper Spunk Lake Safety Rest Area. The State specifically selected the location of this rest area to take advantage of the scenic views of Upper Spunk Lake, and an overhead transmission line on Route D would be positioned between the rest area and the lake. If Route D were constructed underground, it would not impair this aspect of the rest area.

**Response:**

The discussion in section 7.3.2 of the FEIS will be revised.

**COMMENT #503 COMMENT SOURCE: LETTER****Name: Seykora, David****Comment:**

Section 7.4.2 - Table 7.4.12 lists programmed highway projects within the study area. The following three additional projects should be added to this table: (a) a resurfacing project on 1-94 from Albany to County Road 159 at St. John's; (b) a resurfacing project on 1-94 from County Road 159 to the CSAH 75 interchange near S1. Joseph; and (c) a sign replacement project along 1-94 in Stearns County.

**Response:**

These projects will be added to Table 7.4.12. Text will be added to Section 7.4.2 of the FEIS.

**COMMENT #504 COMMENT SOURCE: LETTER**

**Name: Seykora, David**

**Comment:**

Section 7.4.1 - The traffic counts listed for 1-94 in Table 7.4 3 should reflect that volumes in that area range up to 29,500 per day.

**Response:**

Table 7.4-3 will be updated to include a range of 24,400 to 29,500 AADT for I-94.

**COMMENT #505 COMMENT SOURCE: LETTER**

**Name: Seykora, David**

**Comment:**

Section 7.4.2 - On page 7-63, the DEIS states that the presence of underground transmission lines would prevent roadways from being built on top of the 60 foot wide transmission line right-of-way. Mn/DOT has not been provided a complete description of the extent of restrictions on land use that would be imposed in locations of an underground transmission line location, nor information about the potential location of underground transmission lines in relation to trunk highway rights-of-way. However, the statement on page 7-87 of the DEIS that any agricultural land use or agricultural production would be prohibited within the 60 foot wide transmission line right-of-way indicates that highway-related activities would be severely constrained. Thus, it appears that new overpasses or interchanges could not be constructed in such areas. Moreover, if Mn/DOT would be restricted from activities such as installing signs, lighting, or fencing or changing the slopes for drainage in the area where an underground transmission line is located, it is doubtful that it could be permitted to overlap with the highway right-of-way.

**Response:**

See section 4.5 of the DEIS for a discussion on underground sections. It is possible that the presence of underground transmission lines would limit roadway improvement options, or would require the relocation of the underground transmission line should transportation improvements be necessary.

**COMMENT #506 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

In a September 16, 2009 project meeting with CapX, DNR representatives indicated a preference for the non-interstate route. Our February 11, 2011 scoping comments specifically

listed several areas of concern along the I-94 corridor due to the area use for migration and staging for high concentrations of waterfowl and other migratory species (see enclosed DNR letter).

**Response:**

Comment noted.

**COMMENT #507 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Based on DEIS content, it would appear that the applicant preferred route from Alexandria to Sauk Center (following I-94) has the least potential for impacts to waterfowl and migratory birds, however; important information provided by DNR during scoping was not included in the DEIS. Use of the Route A south of an area identified as an Important Bird Area (IBA) would help to avoid potential bird mortality associated with collisions with transmission lines.

**Response:**

Comment noted.

**COMMENT #508 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

A detail of the modified foundation type should be included in the Final EIS. Currently it is unclear how the footprint of the modified foundation type would be different from the standard foundation type and whether this would cause any changes in project effects on natural resources.

**Response:**

According to the Applicant, the modified foundation type is a pile cap foundation. It is 24 feet square and four feet deep (the permanent impact assumption is 55 square feet for each pole, regardless of foundation type). The purpose of the pile cap foundation is to create a wider footprint to improve the stability of the transmission structure in wet areas. During final design details will be developed.

**COMMENT #509 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Sections 4.3.1, 6.3.1 and 7.3.1 do not provide reference to Minnesota's identified Water Trails. These sections should be modified to include information on Minnesota's Water Trails. Information about water trails is available at [www.dnr.state.mn.us/watertrials/index.html](http://www.dnr.state.mn.us/watertrials/index.html).

**Response:**

A discussion on water trails has been included in the FEIS.

**COMMENT #510 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The FEIS should provide the following additional detail regarding avian use and mortality risk to facilitate a comparison of routes and mitigation methods. The discussion provided lists area where waterfowl are more susceptible to collision (e.g. between field and water) but does not indicate whether such areas are present along the routes. Providing these locations is an example of detail needed for a comparative analysis. Providing peer reviewed literature citations supporting conclusions and assertions made in the DEIS regarding potential avian impacts and mitigation effectiveness would also assist the reader in comparing potential project plans. Providing this additional information will make comparisons of avian effects and mitigation between routes possible for wildlife agencies and other interested parties.

**Response:**

The DEIS was developed using reasonably available information. Preparing a risk assessment with supporting conclusions and assertions is beyond the scope of this EIS. See also response to comment 34 regarding the Applicant's voluntary Avian Protection Plan.

**COMMENT #511 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Linking the information in tables 5.9-3, 6.9-4 and 7.9-4 (Habitat Impact Evaluations) to the discussions on potential impacts to fauna would help to provide the needed comparisons. A relative avian mortality risk ranking could also be provided for each route (add another column to the route impact evaluation tables). Including "thunderstorm map" showing high risk areas (based on proximity to use areas) would also be useful in comparing various routes and to inform avoidance decisions for identified risk areas. Such maps are available from the USFWS.

**Response:**

See response to comment 510.

**COMMENT #512 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Page 6-79 states, "through coordination with USFWS and MNDNR, no areas of concern were identified between Alexandria and Sauk Centre." This statement is incorrect. DNR scoping comments make specific mention of bird use areas around Osakis. The EIS for the project

needs to assess the habitat value of Clifford Lake as well as the habitat value of the alternative segment south of this area from Alexandria to Sauk Centre.

**Response:**

The FEIS includes a discussion about Clifford Lake and the Lake Osakis IBA, and the language from page 6-79 has been modified.

**COMMENT #513 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Tables 5.9-3, 6.9-4 and 7.9-4 and associated discussions and conclusions should be modified to include all areas of concern identified through coordination with USFWS and DNR. These tables should also be modified to include both the Lake Osakis and Avon Hills IBA.

**Response:**

Tables 5.9-3, 6.9-4 and 7.9-4 are the Route Impact Evaluation Tables which identify acreage of potential impacts to sensitive management areas and conservation easements within proposed routes and right-of-way for each route and route option. Lake Osakis is a PWI located more than two miles north of the Preferred Route which is beyond the limits of the comparison for the tables. A discussion has been added about the Avon Hills IBA and impacts to the IBA, where applicable have been updated in Table 7.9-4. The Lake Osakis data is not available in GIS therefore a discussion was included but acreages were not calculated at this time.

**COMMENT #514 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

DNR scoping comments indicated that Minnesota's State Wildlife Action Plan (SWAP) should be used to inform the content of the EIS. This information is not currently included in the DEIS.

**Response:**

This information has been included to expand the discussion and the tables for Species of Greatest Conservation Need (SGCN) and Key Habitats in the Rare and Unique Natural Resources/Critical Habitat discussions in Sections 5.9.2, 6.9.2 and 7.9.2 of the FEIS.

**COMMENT #515 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

A description of both key habitats and SGCN that could be impacted by the various route alternatives should be included in the EIS, possibly in sections on affected environmental and

potential impacts. This information could be added to Tables 5.9-3; and 7.9-4 (Habitat Impact Evaluation). This information could be included in the EIS by either including a separate section and table for Species of Greatest Conservation Need (SGCN), or modifying the section titled "protected species" and associated table to include SGCN.

**Response:**

See response to comment 514.

**COMMENT #516 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The text on pages 5-95, 6-83 and 7-127 indicates that Tables 5.9-6, 6.-9-5 and 7.9-8 respectively include state listed species found within one mile of the proposed routes, within 1000' route corridor, and within the 150' proposed ROW for each route, however; the tables do not depict species within 1 mile of the routes as indicated in text. The tables should be updated to include this missing information.

**Response:**

The FEIS has been updated with tables including protected species within one mile of the proposed routes.

**COMMENT #517 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Woody vegetation plays an important role in providing habitat for wildlife along riparian corridors as well as providing shading of streams. Potential mitigation for possible effects could include a permit condition requiring that a riparian corridor consisting of shrub or low woody species be protected and maintained within all shoreland impact zones.

**Response:**

Comment noted.

**COMMENT #518 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The DNR agrees with the approach to span crossings of water bodies and wetlands to avoid degradation due to increased sedimentation and soil erosion caused by construction or maintenance activities. In areas where this may not be avoided, particularly for waters not included under the jurisdiction of the DNR License to Cross Public Lands and Waters (non-

public waters), the DNR requests to be involved in structure placement and structure-type options discussions.

**Response:**

Comment noted.

**COMMENT #519 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

DNR scoping comments requested that, "A list and analysis of mitigation measures for reducing avian mortality associated with power line collisions should be included in the EIS. Avian avoidance for power lines and mitigation effectiveness should also be discussed. The analysis should include the review and summary of existing peer review literature about transmission line effects on individual birds and bird populations, types of mitigation, and variability of mitigation measures, such as placement and spacing of bird diverters." This information is not included in the DEIS. The DEIS (page 5-99, 6-85, and 7-130) currently states that avian issues could be addressed by working with the USFWS and DNR to identify areas that may require marking with bird diverters.

**Response:**

See response to comment 510.

**COMMENT #520 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

While the DEIS does list some types of mitigation, it currently lacks descriptions of the effectiveness of various mitigation measures in reducing avian mortality. The lack of information makes it difficult to provide informed recommendations on the amount or types of mitigation necessary. Including this information as part of the FEIS will assist the DNR in providing recommendations regarding mitigation.

**Response:**

Additional information regarding the applicant's Avian Protection Plan has been included in the FEIS.

**COMMENT #521 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The DNR scoping comments requested that the plan, including specific monitoring and mitigation measures, should be included in the EIS. This information is not included in the

DEIS. The DEIS currently states that the development of the plans is underway. With a project of this scope, it is important that such a plan that is unique to the project is completed and provided for review prior to permitting.

**Response:**

See response to comment 520.

**COMMENT #522 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Pages 5-100, 6-87 and 7-132 indicate that wetland and water boundaries could be identified and marked prior to construction to assure protection and that setbacks from these areas could be established when possible or when required by permit conditions.

**Response:**

Comment noted.

**COMMENT #523 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Tables 5.9-3, 6.9-3 and 7.9-4 should include a list of the native plant community types that may be impacted by the proposed project. Currently the tables are unclear about possible effects to types of native plant communities because they list "5 MCBS Native Plant Communities." The tables should also identify whether the MCBS Native Plant Communities would be spanned or whether there would be ground disturbance within these areas. It is currently unclear whether the MCBS Railroad Right-of-Way Prairies will be spanned or if there will be ground disturbance.

**Response:**

Once a final alignment is selected, surveys could be conducted to identify native plant communities as appropriate. MCBS areas could be spanned to the extent practicable. A native prairie restoration plan could be required as a condition of the route permit.

**COMMENT #524 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Pages 5-101, 6-87 and 7-131 indicate, "...if it is not feasible to span, surveys could be conducted to determine the presence of state-listed species or suitability of habitat for such species, and coordination could occur with the appropriate agencies to avoid and minimize any associated impacts." Project planning should take into account the seasonal survey requirements of various species.

**Response:**

The Protected Species discussions in Sections 5.9.3, 6.9.3, and 7.9.3 of the FEIS have been updated to include language that considers seasonal survey requirements.

**COMMENT #525 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The Protected Species sections should address the trumpeter swan and the Blanding's turtle, two state-listed threatened species that may be impacted by the proposed project. The EIS should include a discussion of the likelihood of incidental takings of trumpeter swans due to mortality from collisions. Also, the Blanding's turtle may be encountered in Stearns County. Sections 6.9.3. Mitigation and 7.9.3. Mitigation, under Protected Species, should address measures to avoid and/or minimize impact to this rare turtle.

**Response:**

No trumpeter swans were identified within one mile of any of the proposed routes based on a review of NHIS data; the text has been modified to note that the project area is within the range of the trumpeter swan, and trumpeter swans may occur in the project area. The protected species discussion in Section 7.9.3. of the FEIS text has been updated to include a discussion on the Blanding's turtle. The Blanding's turtle Fact Sheet has been included in Appendix D of the FEIS.

**COMMENT #526 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Section 8.0 does not acknowledge that a DNR License to Cross is required for project developers crossing state land. Project developers crossing (over, under, across) any state land or public water with any utility (power lines, including feeder lines) must first secure a DNR license to Cross.

**Response:**

The DNR License to Cross permit has been added to the Permits and Approvals Table in Section 8 of the FEIS.

**COMMENT #527 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

Section 4.1 and subsequent related sections throughout the report discuss staging and temporary lay-down areas that would be established for the Project. These areas selected for their location, access, security and chosen to minimize excavation and grading. These areas would be located

outside of the transmission ROW and that would be obtained from landowners through rental agreements. The applicant should be made aware that these areas should not be located on or directly adjacent to state land based natural resources (i.e. WPAs, WMAs, SNAs, Critical habitats etc.). The applicant should work with the DNR to identify areas that should be avoided for these sites. If encroachment into these resources is unavoidable, the applicant should work with the DNR to identify appropriate Best Management Practices (BMP).

**Response:**

Comment noted.

**COMMENT #528 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

It is recommended that the Public Utilities Commission consider requiring that the applicant complete an overall Construction Environmental Control Plan (CECP) to make sure that appropriate systems are in place to ensure compliance with various permit and project plans.

**Response:**

The route permit will include detailed conditions for environmental protection during construction.

**COMMENT #529 COMMENT SOURCE: LETTER**

**Name: Schrenzel, Jamie**

**Comment:**

The use of third-party agency monitors to work with and supplement agency field presence has been very beneficial on other large projects. These monitors help to satisfy reporting expectations and to ensure that impacts to protected resources are avoided and/or minimized.

**Response:**

Comment noted.

**COMMENT #530 COMMENT SOURCE: EMAIL**

**Name: Lahr, Darrin**

**Comment:**

Pages 5-22, 5-24 - Tables 5.2-5 and 5.2-6 are incomplete and run off the page.

**Response:**

Table 3.4-3, which was Table 5.2-5 in the Draft EIS, has been revised to add the 300' column.

**COMMENT #531 COMMENT SOURCE: EMAIL**

**Name: Lahr, Darrin**

**Comment:**

Page - 5-23 - "2011" in second line at the top of the page should be "2015".

**Response:**

The dates have been change and can be found on page 3-11 of the FEIS.

**COMMENT #532 COMMENT SOURCE: EMAIL**

**Name: Lahr, Darrin**

**Comment:**

Page 5-25 - References to 32.89-68.35 milligauss appear to be incorrect, as they don't match readings listed in the table.

**Response:**

The numbers have been corrected and can be found on page 3-11 of the FEIS.

**COMMENT #533 COMMENT SOURCE: EMAIL**

**Name: Lahr, Darrin**

**Comment:**

Page 5-32 - Reference to a "Preferred Alternative Route" in the last paragraph on the page, should be "Applicant Preferred Route."

**Response:**

The typo has been corrected and can be found on page 3-13 of the FEIS.

**COMMENT #534 COMMENT SOURCE: EMAIL**

**Name: Lahr, Darrin**

**Comment:**

Page 5-91 - Square footage impacts of the poles listed in Table 5.9-2 cannot be reconciled e.g., first row indicates 35 poles at 1,000 square foot impact per pole, but total feet affected is listed as 1,950.

**Response:**

The typo has been changed and can be found on page 3-20 of the FEIS.

**COMMENT #535 COMMENT SOURCE: LETTER****Name: Lahr, Darrin****Comment:**

On page 5-50, the DEIS references the Lesmeister Flying Service airport, which would be impacted by Amended Scoping Area 1 (“AS-1”) as identified in the EIS Amended Scoping Decision. After the EIS Amended Scoping Decision was issued, the Lesmeisters provided a letter explaining that AS-1 would bisect one of the runways of their private aviation business. Applicants therefore undertook further evaluation of the area. In our ongoing review, Applicants continue to believe that a negotiated solution may be viable; however, we have also identified a potential Option 13, which proceeds south from AS-1 around the Lesmeisters’ north/south airstrip. See enclosed map. While this alternative would add three miles to the route length, Applicants believe this alignment would avoid any impacts to the airstrip and therefore Option 13 should be evaluated in the Final Environmental Impact Statement.

**Response:**

Option 13 has been analyzed and can be found in Section 3.3 of the FEIS.

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### 3.0 ADDITIONS AND REVISIONS TO THE DEIS

The purpose of this section is to discuss additional information that was brought forth during the public comment period through written comments or testimony. The references in the parentheses following the titles in this section are the corresponding sections in the DEIS in which the addition or revision is being made. Where specific DEIS text has been deleted or added, the revision has been identified using ~~strikeout~~ or underline font. New text added to the DEIS has also been underlined. Notes to the reader are identified in [brackets].

#### 3.1 PROJECT DESCRIPTION (SECTION 1.1 OF THE DEIS)

The proposed Fargo to St. Cloud 345 kV Transmission Line Project would be approximately 169-180 miles long, extending from the North Dakota and Minnesota border in the Clay and Wilkins county area to the Quarry Substation west of St. Cloud, Minnesota.

According to the Applicant the proposed structures would primarily include single-pole, double circuit capable, self-weathering, or galvanized steel structures that would range in height between 130 and 175 feet. The span length between structures would typically range in length between 600 and 1,000 feet depending on site-specific considerations. Although the proposed line would be built using double circuit capable poles, only one circuit would be installed for this Project. The second position would be available for a future additional circuit. The ROW for the proposed 345 kV electrical transmission line would generally be 150 feet in width.

- Fargo to St. Cloud 345 kV transmission line – The proposed line would be constructed primarily on single-pole, double circuit capable, self-weathering, or galvanized steel structures. At this time, ~~only one~~ two sets of davit arms would be installed on the structures, but only a single circuit would be installed and energized after completion of construction. The second set of davit arms allows provides the equipment necessary to install a second circuit in current installation of a single circuit in the future.

#### 3.2 ESTIMATED PROJECT COST (SECTION 1.6 OF THE DEIS)

Estimated cost are summarized in Table 3.2-1 below and provided in 2009 dollars. Final costs will depend on the final route permitted and the final alignment developed.

**Table 3.2-1 (Table 1.6-1 of the DEIS). Cost Estimates**

Route/Option	Cost
Applicant Preferred	\$254,000,000
Route A	\$294,000,000
Route B	\$334,000,000
Route C	\$283,000,000
Route D <u>Without Undergrounding</u>	\$250,000,000
Route D <u>With Undergrounding</u>	<del>\$285,350,000</del> <b>** 535,350,000</b>
Route E	\$253,000,000
Route F	\$265,100,000
Route G	\$255,800,000
Route H	\$255,400,000
<b>Cost Estimates for Route Options *</b>	
Route Option 1	\$7,000,000
Route Option 2a	\$15,725,000
Route Option 2b	\$14,620,000
Route Option 3	\$7,000,000
Route Option 4	\$8,500,000
Route Option 5	\$5,100,000
Route Option 6	\$2,500,000
Route Option 7	\$3,400,000
Route Option 8	\$850,000
Route Option 9	\$6,700,000
Route Option 10	\$2,500,000
Route Option 11	\$5,100,000
<b>Amended scope Areas and Alexandria Substation*</b>	
AS-1	\$2,890,000
AS-2	\$5,100,000
AS-3(Alexandria Substation)	N/A
AS-4	\$850,000
AS-5	\$3,400,000

*\*The cost estimates for the route options and amended scope areas were calculated by taking the length of the Route Option times \$1,700,000 million dollars per mile.*

There may be additional but minimal costs associated with the final connections and configurations at the substation to allow for the interconnection of the Fargo to St. Cloud 345 kV Project.

### 3.2.1 Right of way sharing on routes

[Several commentors expressed a concern that the DEIS did not identify the amount of right of way or linear features paralleled along the routes.]

Tables 3.2.2 and 3.2.3 below identify miles and percentage of the routes that parallel existing transmission line right of way or other linear features. Table 3.2.2 compares the Applicant's Preferred Route with the other routes being considered from the North Dakota Border to St Cloud. Table 3.2.3 compares Applicant's Amended Scope Option 1(AS-1) with the routes being considered from the North Dakota Border to St Cloud.

**Table 3.2-2.(Table added as a result of comments received) North Dakota to Alexandria Corridor Sharing**

Route/Option	Miles Paralleling Linear Features							Percent
	Road	Field	Rail	Trail	Transmission	None	Total	
<b>Route Alternatives</b>								
Preferred Route	90.8	3.7	0	0.8	0	6.4	101.7	93.7
Route A	62.0	12.1	0	0	4.9	4.9	83.8	94.2
<b>Route Options</b>								
Option 1	2.8	1.0	0	0	0	0	3.8	100
Option 1 - Pref Route *	3.1	0	0	0	0	0	3.1	100
Option 2a	6.4	2.8	0	0	0	0	9.3	100
Option 2b	7.6	1.0	0	0	0	0	8.6	100
Option 2 - Pref Route *	7.9	0	0	0	0	0	7.9	100
Option 3	2.4	1.5	0	0	0	0	3.9	100
Option 3 - Pref Route *	2.3	0	0	0	0	0	2.3	100
Option 13	1.0	2.0	0	0	0	0	3.0	100
<b>Amended Scope Options</b>								
Option 13 - AS1	0	1.0	0	0	0	0	1.0	100
Option AS1	0	16.3	0	0	0	0.5	16.71	97.3
Option AS1 - Pref Route*	16.1	2.0	0	0	0	0	18.1	100
Option AS2	18.3	3.0	0	0	0	0.5	21.71	97.9
Option AS2 - Pref Route*	16.1	2.0	0	0	0	0	18.1	100

\*Represents a comparable portion of the route identified

**Table 3.2-3. (Table added as a result of comments received) Alexandria to Sauk Centre  
Section Sharing**

Route/Option	Miles Paralleling Linear Features							Percent
	Road	Field	Rail	Trail	Transmission	None	Total	
<b>Route Alternatives</b>								
Preferred Route	22.6	0	0	5.1	0	2.6	30.3	91.4
Route A	10.5	20.3	0	0	0	4.5	35.3	87.17
<b>Route Options</b>								
Option 4	1.8	3.2	0	0	0	0	5.0	100
Option 4 - Route A *	1.5	3.5	0	0	0	0	5.0	100
Option 5	0	0.8	0	2.5	0	0	3.3	100
Option 5 - Pref Route *	3.0	0	0	0	0	0	3.0	100
Option 6	3.7	6.4	0	0	0	2.6	12.6	79.7
Option 6 - Pref Route *	7.0	0.5	0	1.7	0	0	9.2	100
Option 7	0	2.3	0	0	0	0	2.3	100
Option 7 - Route A *	2.2	1.0	0	0	0	0	3.23	100

*\*Represents a comparable portion of the route identified*

**Table 3.2-4. (Table added as a result of comments received) Sauk Centre to St. Cloud Section Sharing**

Route/Option	Miles Paralleling Linear Features							Percent
	Road	Field	Rail	Trail	Transmission	None	Total	
<b>Route Alternatives</b>								
Preferred Route	21.9	13.2	0	0	7.4	4.6	47.1	90.1
Route A	23.6	12.4	0	0	7.4	3.6	47.0	92.4
Route B	38.7	4.3	0	0	0	3.1	46.2	93.2
Route C	30.7	5.2	0	0	2.2	1.2	39.4	96.9
Route D	30.0	4.4	0	3.0	0	0.2	37.7	99.4
Route E	20.52	7.8	1.0	0	10.8	3.6	43.8	91.7
Route F	45.72	2.5	0	0	0	1.5	49.8	96.9
Route G	31.32	4.3	0	1.0	0	7.7	44.4	82.7
Route H	29.72	13.5	1.0	0	0	0.7	44.9	98.6
<b>Route Options</b>								
Option 8	0	0.6	0	0	0	0	0.6	100
Option 8 - Pref Route	0.3	0.5	0	0	0	0	0.8	100
Option 9	2.6	0	0	2.2	0	0	4.8	100
Option 9 - Pref Route	4.3	0.3	0	0	0	0	4.6	100
Option 10	0.2	1.3	0	0	0	0	1.5	100
Option 10 - Route A	0.2	1.1	0	0	0	0	1.4	100
Option 11	1.5	1.9	0	0	0	0	3.5	100
Option 11 - Route E	2.6	0.9	0	0	0	0	3.5	100
Option 12 - Route B	1.7	0	0	0	0	0	1.7	100
Option 12 - Route E	0	0	1.2	0	0	0	1.2	100
<b>Amended Scope Options</b>								
Option AS5	1.3	0.4	0	0	0	0.5	2.2	78.3
Option AS5 - Route D	1.0	0	1.2	0	0	0	2.2	100
<b>Underground Options</b>								
Route D-Underground segment on the west side of the Route	1.5	0	0	0	0	0	1.5	100
Route D- Underground segment in the middle of the Route.	1.8	0	0	0	0	0	1.8	100
Route D- Underground segment on the east side of the Route.	7.2	0	3.0	0	0	0	10.2	100

*\*Represents a comparable portion of the route identified*

### 3.3 ADDITION OF OPTION 13 (OPTION 13 HAS BEEN ADDED IN THE FEIS AS A RESULT OF COMMENTS RECEIVED)

The Applicants provided comment on the DEIS to the OES and direct testimony to the Office of Administrative Hearings on October 13, 2010. The comment and testimony included a request to add evaluation of a new Route Option (Option 13) to the FEIS. The request was made as a result of further review and discussion with an affected landowner located in the area that owns and operates a crop dusting business (see Figure 1) The Applicants have requested that the FEIS evaluate the Option 13 area for human and environmental impacts. The figures in the DEIS Appendix H have been revised to include Option 13.

The OES analyzed the human and environmental impacts within Option 13 using the same approach used in the DEIS for the other Route Options.

#### 3.3.1 Human Settlement

The table below identifies the land use data for the option and the applicant preferred route.

**Table 3.3-1. Land Use Data, Option 13 Area in the Route**

Routes and Right of Way (ROW)	Acres of Land Use				
	Agriculture/ Undeveloped	Residential	Commercial/I ndustrial	Municipal	Recreation
<b>Route Area</b>					
Option 13	362	0	0	0	0
AS-1 Route	517	0	0	0	0
<b>ROW Area</b>					
Option 13	55	0	0	0	0
AS-1 Route	18	0	0	0	0

There are no residential or non residential structures located along Option 13. The comparative segment of the AS-1 route contains 4 residential structures and 12 non-residential structures within the proposed route. None of these structures fall within the proposed ROW of the comparative segment of the AS-1 route.

Existing land uses in proximity to the option and the applicant preferred route are not expected to change as a result of construction and operation of the proposed transmission line.

No impacts to human settlement are anticipated from either Option 13 or the comparative segment of the AS-1 route.

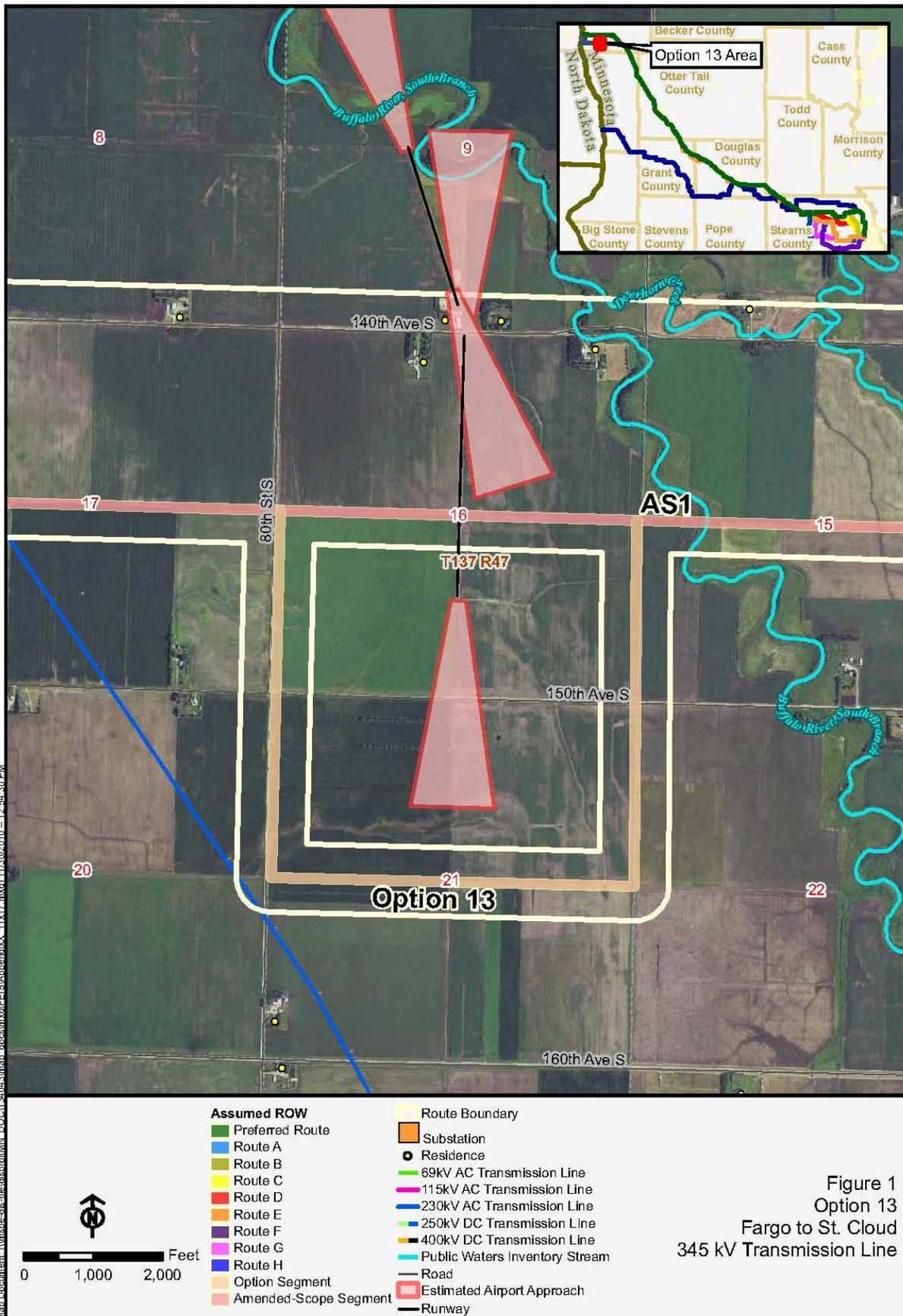


Figure 1  
Option 13  
Fargo to St. Cloud  
345 kV Transmission Line

### **3.3.2 Public Health and Safety**

No impacts to public health and safety are anticipated from either Option 13 or the comparative segment of the AS-1 route.

### **3.3.3 Recreation and Aesthetic Resources**

There are no parks, trails, State Wildlife Management Areas or Scientific and Natural Areas located in the area of Option 13 or the comparative segment of the AS-1 route. There is no National Wildlife Refuge or Waterfowl Production Area within a mile of this option or the preferred route. Neither the option nor the preferred route would be located on any U.S. Fish and Wildlife Service (USFWS) easements. There are no impacts anticipated on these resources.

### **3.3.4 Transportation**

Both Option 13 and the AS-1 route would cross multiple local roadways. Temporary impacts to transportation may occur during construction. Impacts to roadway traffic flow during construction are expected to be minimal.

No airports open to public use are expected to be impacted by option or the applicant preferred route. The nearest public airport is Barnesville Municipal Airfield located 8.6 miles east of the option area.

The comparative segment of the AS-1 route directly bisects a private runway operated by the Lesmeister Flying Service. Selection of this route would result in closure of the runway. Option 13 would avoid impacting the runway by traveling south for approximately one mile paralleling the shared section line of sections 15 and 16 of Township 137 Range 47, then turning east at the quarter section line of section 21 township 137 range 47 and finally turning north and paralleling 70<sup>th</sup> Street South until it rejoins the AS-1 route as shown in Figure 1. This option would avoid the runway by approximately 1 mile to the south and 0.5 mile on the east and west. The Applicant has proposed Option 13 as avoidance of permanently impacting operations of the Lesmeister Flying Service.

Other mitigations for routing along the Applicants' Preferred Route would be to move the airstrip to the north or to reorient the air strip to avoid potential interference for take offs and landings.

### **3.3.5 Wireless Technologies**

No impacts to wireless technologies are anticipated from either Option 13 or the comparative segment of the AS-1 route.

### **3.3.6 Archaeological and Historic resources**

No impacts to archaeological or historic resources are anticipated from either Option 13 or the comparative segment of the AS-1 route.

### **3.3.7 Land Based Economics**

The table below summarizes the land-based economic resources located within the AS-1 route and route Option 13.

**Table 3.3-2. Land Based Economic Resources, Option 13 Area**

Routes and Right of Way (ROW)	Resource	
	Prime Farmland (Acres)	Woodland (Acres)
<b>Route Area</b>		
Option 13	1	0
AS-1 Route	39	0
<b>ROW Areas</b>		
Option 13	0	0
AS-1 Route	3	0

Land underneath the transmission lines could still be used for agricultural purposes, impacts to land based economics are expected to be minimal.

**3.3.8 Water Resources**

The table below summarizes the water resources located within the AS-1 route and route Option 13.

**Table 3.3-3. Water Resources, Option 13 Area**

Routes and Right of Way (ROW)	Resource			
	NWI Wetlands (Acres)	Stream Crossings	Total Acreage of 100-year Floodplain	Number of Poles
<b>Route Area</b>				
Option 13	1.5	1	37	1
AS-1 Route	7	1	202	2
<b>ROW Areas</b>				
Option 13	0.15	1	6	1
AS-1 Route	0.23	1	3	2

There would be no permanent impacts to wetlands within the area of Option 13 or the comparative segment of the AS-1 route as all of these resources would be spanned. Significant flood plain impacts are not anticipated for either option, as the placement of one to two poles in the 100 year flood plain would not reduce flood storage or flow.

**3.3.9 Natural Resources**

No impacts to natural resources are anticipated from either Option 13 or the comparative segment of AS-1, as the area is entirely agricultural.

**3.3.10 Air Quality**

No impacts to air quality are anticipated from either the option or the applicant preferred route.

**3.4 AFFECTED ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION-NORTH DAKOTA TO ALEXANDRIA (SECTION 5 OF THE DEIS)**

**3.4.1 Affected Environment – Human Settlement (Section 5.1.1 of the DEIS)**

***Land Use and Zoning***

The numbers were corrected in the Tables 3.4-1 and 3.4-2 below.

Zoning within each route is illustrative of the type of land use that could be impacted by the ultimate 150-foot transmission line alignment. Quantitative data on specific alignments is provided in Table 3.4-1. and Table 3.4-2 for the Applicant Preferred Route, Route A, and the route options within the North Dakota to Alexandria area. The alignments associated with the Applicant Preferred Route consider ROW occupancy with Interstate 94. The ROW Occupancy alignment proposes an alignment within 25 feet of the Interstate 94 ROW and the no ROW occupancy alignment proposes no ROW occupancy with Interstate 94.

**Table 3.4-1. (Table 5.1-8 of the DEIS) Route Right-of-Way Impact Evaluation for Land Use: Route Alternatives**

Route	Acres						
	Agriculture	Residential	Commercial /Industrial	Municipal	Recreation	Special Ag.	Transitional
Applicant Preferred ROW Occupancy	1,063 4,034	58 88	22 33	0	77 447	0	0
Applicant Preferred No ROW Occupancy	1,620 682	88 58	33 22	0	117 77	0	0
Route A	1,129	105	2	0	87	81	111

Land use impacts associated with the route options are shown in Table 3.4-2. All three options would result in greater land use disturbance since they all bypass the Interstate 94 corridor to avoid developed uses near Interstate 94. For Option 1, 14 additional acres of agricultural land would be affected compared to the ROW occupancy alternatives. In the Option 2 area, the ROW occupancy alternatives would impact 34 more acres of recreational land than Option 2a. Option 3 would impact more recreation land than the ROW occupancy alternatives.

**Table 3.4-2. (Table 5.1-9 in the DEIS) Route Right-of-Way Evaluation for Land Use: Route Options**

Option	Acres						
	Agriculture/ Undeveloped	Residential	Commercial /Industrial	Municipal	Recreation	Special Ag.	Transitional
<b>Option 1</b>							
Applicant Preferred ROW Occupancy	<u>37</u> <del>56</del>	0	0	0	0	0	0
Applicant Preferred No ROW Occupancy	<u>56</u> <del>37</del>	0	0	0	0	0	0
Option 1	70	0	0	0	0	0	0
<b>Option 2</b>							
Applicant Preferred ROW Occupancy	<u>65</u> <del>99</del>	0	0	0	<u>29</u> <del>44</del>	0	0
Applicant Preferred No ROW Occupancy	<u>99</u> <del>65</del>	0	0	0	<u>44</u> <del>29</del>	0	0
Option 2a	158	0	0	0	10	0	0
Option 2b	123	0	0	0	33	0	0
<b>Option 3</b>							
Applicant Preferred ROW Occupancy	0	0	0	0	<u>11</u> <del>47</del>	<u>17</u> <del>26</del>	0
Applicant Preferred No ROW Occupancy	0	0	0	0	<u>17</u> <del>44</del>	<u>26</u> <del>47</del>	0
Option 3	0	0	0	0	40	32	0
<b>Amended Scope Options</b>							
Applicant Preferred ROW Occupancy	<u>291</u> <del>332</del>	0	0	0	0	0	0
Applicant Preferred No ROW Occupancy	<u>332</u> <del>291</del>	0	0	0	0	0	0
Option AS-1	307	0	0	0	0	0	0
Option AS-2 ROW Occupancy	398	0	0	0	0	0	0
Option AS-2 No ROW Occupancy	398	0	0	0	0	0	0
Option AS-3	0	4	0	0	0	0	0

**3.4.2 Public Health and Safety (Section 5.2 of the DEIS)**

**Magnetic Fields**

Table 3.4-3 below provides calculated magnetic fields for each structure and conductor configuration proposed for the project. Magnetic fields were calculated for each section of the project and under two system conditions; the expected peak and average current flows as projected for the year 2015 ~~44~~, under normal system intact conditions. Current is given in amps. The peak magnetic field values are calculated at a point directly under the transmission line and where the conductor is closest to the ground. The same method is used to calculate the magnetic field at varying distances from the alignment of the structure. The magnetic field profile data show that magnetic field levels decrease rapidly (inverse square of the distance from source) from the alignment.

**Table 3.4-3. (Table 5.2-6 of the DEIS) Calculated Magnetic Fields (milligauss) for proposed double circuit 345 kV Transmission Line Designs (3.28 feet above ground)**

Structure Type	System Condition	Current (Amps)	Distance to Proposed Centerline												
			-300'	-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'	300'
Single Pole Davit Arm 345kV Single Circuit Delta Config	Peak	264	0.79	1.67	5.62	8.70	14.36	23.45	31.89	29.76	17.92	10.19	6.26	1.65	0.72
	Average	158	0.47	1.00	3.36	5.21	8.60	14.03	19.08	17.81	10.73	6.10	3.75	0.99	0.43
Single Pole Davit Arm 345kV Single Circuit Vertical Config	Peak	264	0.86	1.97	7.12	11.10	18.17	27.45	25.55	16.04	9.86	6.41	4.42	1.48	0.71
	Average	158	0.52	1.18	4.26	6.65	10.87	16.43	15.29	9.60	5.90	3.84	2.64	0.88	0.42
Single Pole Davit Arm 345kV/345kV Double Circuit with One Circuit In Service	Peak	264	0.71	1.48	4.43	6.43	9.89	16.09	25.62	27.50	18.18	11.10	7.11	1.97	0.86
	Average	158	0.43	0.89	2.65	3.85	5.92	9.63	15.33	16.46	10.88	6.64	4.25	1.18	0.52
Single Pole Davit Arm 345kV/345kV Double Circuit with Both Circuits In Service	Peak	264	0.19	0.58	3.32	6.08	11.96	22.90	30.03	23.06	12.10	6.17	3.39	0.59	0.19
	Average	158	0.11	0.35	1.99	3.64	7.16	13.71	17.97	13.80	7.24	3.70	2.03	0.35	0.12

Predicted magnetic field strengths range from ~~32.89-15.29~~ to ~~68.35-31.89~~ milligauss at the mid-point of the proposed line. These levels are considerably less than the recommended exposure guidelines listed in Table 3.4-4 below.

**Table 3.4-4. (Table 5.2-2 of the DEIS). Magnetic Field Exposure Guidelines**

Organization	Magnetic Field Exposure Guidelines (mG)	
	General Public	Occupational
ICNIRP (2009)	833	4,200
IEEE (2002)	9040	27,100
ACGIH (2009)	–	10,000

*ICNIRP – International Commission on Non-Ionizing Radiation Protection*

*IEEE – Institute of Electrical Engineers and Electronic Engineers*

*ACGIH – American Conference of Governmental Industrial Hygienists*

After publication of the DEIS, additional analysis was conducted regarding potential future amperage loads on the transmission line. This analysis looked at a potential system maximum loading of 1,000 amperes, and potential future maximum amperage of 2,500 amperes, with new generation sources added to the grid. The results of this analysis are presented in Table 3.4-5. Magnetic field levels are notably higher under these operating scenarios (maximum of just under 106 milligauss at the edge of the right of way), but are still below recommended exposure guidelines of other states referenced in the DEIS (maximum of 150 to 250 milligauss at the edge of the transmission line right of way).

It is also important to note that the Applicant developed these higher operating amperage scenarios using multiple operating assumptions based on two power generation development scenarios in South Dakota, North Dakota, and Manitoba. Both scenarios estimate potential highline loading conditions during off-peak times (approximately six hours per day) with other major transmission facilities out of service, and are not indicative of normal operating conditions. The Applicant indicated that they have limited certainty of the likelihood of these scenarios being reached under actual operating conditions. The Applicant also stated that flows nearing 600 MVA could occur during this limited time period only during rare times when wind generation is high and another transmission facility is out of service. The 1500 MVA operating condition would only be reached if additional electric generation facilities beyond those already planned were constructed; this is therefore an unlikely scenario.

**Table 3.4-5. (Table added as a result of comments received) Calculated Magnetic Fields (milligauss) for proposed double circuit 345 kV Transmission Line Designs (3.28 feet above ground) (600 and 1500 MVA Loadings)**

Structure Type	System Loading	Current (Amps)	Distance to Proposed Centerline												
			-300'	-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'	300'
Single Pole Davit Arm 345kV Single circuit Delta Config	600 MVA	1000	2.98	6.33	21.28	32.97	54.40	88.83	120.79	112.71	67.90	38.59	23.71	6.27	2.73
	1500 MVA	2500	7.44	15.84	53.20	82.42	136.01	222.07	301.96	281.77	169.74	96.49	59.28	15.67	6.83
Single Pole Davit Arm 345kV Single circuit Vertical Config	600 MVA	1000	3.26	7.46	26.96	42.06	68.82	103.97	96.76	60.77	37.34	24.29	16.73	5.60	2.67
	1500 MVA	2500	8.15	18.65	67.39	105.14	172.05	259.93	241.91	151.92	93.34	60.72	41.82	13.99	6.68
Single Pole Davit Arm 345kV/345 kV Double circuit with One Circuit In Service	600 MVA	1000	2.70	5.62	16.79	24.37	37.45	60.95	97.03	104.17	68.86	42.03	26.92	7.45	3.26
	1500 MVA	2500	6.74	14.06	41.96	60.92	93.64	152.38	242.57	260.42	172.14	105.07	67.29	18.62	8.15
Single Pole Davit Arm 345kV/345kV Double circuit with Both Circuits In Service	600 MVA	1000	0.73	2.19	12.58	23.01	45.30	86.76	113.75	87.37	45.85	23.39	12.80	2.25	0.74
	1500 MVA	2500	1.81	5.47	31.44	57.53	113.26	216.89	284.37	218.42	114.62	58.47	32.08	5.61	1.84

### 3.4.3 Potential Impacts – Recreation (Section 5.3.2 of the DEIS)

The Applicant Preferred Route includes a wayside rest area located on the eastbound side of Interstate 94 south of Fergus Falls on Iverson Lake. Additionally, two historical markers/wayside rest areas located adjacent to Interstate 94 would be in the Applicant Preferred Alternative Route. The Steamboats on the Red River Historical Marker/wayside rest area is on the westbound side of Interstate 94 north of the Otter Tail County border near Clear Lake. The Minnesota Watershed Historical Marker/wayside rest area is located off of the eastbound travel lanes of Interstate 94 west of Alexandria near Lake Latoka.

### 3.4.4 Mitigation – Recreation and Aesthetic Resources (Section 5.3.3 of the DEIS)

Based on a viewer's response and sensitivity, the presence of transmission lines can detract from the visual attractions of an area. Wherever possible, the proposed transmission lines could be routed alongside existing power lines and section lines, as well as within road, rail, and utility ROWs, to minimize any adverse impacts.

#### **Recreational Land and Trails**

No impacts on recreational uses that would alter or limit the use of these resources are anticipated, therefore, no mitigative measures are proposed.

#### **Scenic Byways**

Scenic byways are roadways designated because of their scenic qualities as well as their history, views, and context. Impacts to scenic byways could be minimized through avoidance or minimizing byway crossings. Visual impacts would be greater on byways that are paralleled versus crossed at a single location.

Potential mitigation measures could include the following.

- Undergrounding the transmission line.
- Structures could be located at the maximum feasible distance from highway and trail crossings within the limits of the structure design.
- Along existing roadways, transmission line alignments could be placed at locations with the fewest impacts to existing ROW.
- Visual screening with vegetation could be considered in the foreground where the route parallels scenic byways; but due to the height of the structure and the transmission lines they may still be visible in the background.

#### **Visual and Aesthetic Resources**

Based on a viewer's response and sensitivity, the presence of transmission lines can detract from the visual attractions of an area. Wherever possible, the proposed transmission lines could be routed alongside existing power lines and section lines, as well as within road, rail, and utility ROWs, to minimize any adverse impacts.

### 3.4.5 Potential Impacts – Roadways (Section 5.4.2 of the DEIS)

The safe movement of oversized goods could potentially be impacted by the alternatives. Interstate 94 from St. Cloud to Moorhead is designated as a Super haul corridor. Super haul corridors are characterized as routes that can handle a 16-foot height limit, a 16-foot width limit with and 8-foot wide axle, a 130-foot length limit, and a 235,000-pound weight limit. Mn/DOT is responsible for preserving the ability to accommodate these characteristics and improve upon them if feasible.

#### Mn/DOT's Safety Rest Area Program

Mn/DOT's Safety Rest Area Program is currently developing a strategic plan for redevelopment of the interstate rest area system in Minnesota. The plan may propose the development of rest areas in new locations along interstate highways in Minnesota and potentially the abandonment or reuse of existing interstate rest areas. The Applicant Preferred route traveling along Interstate 94 could impact Mn/DOT's operations by either restricting available options for locating future safety rest areas or requiring potential relocation of transmission lines.

#### Temporary Construction Impacts

Most of the transportation related impacts due to the project would be from construction activities and would also be temporary in nature. Temporary access for the construction of the new transmission lines would require a 20-foot-wide access trail constructed within the transmission line ROW or by short spur trails from the existing road network to the ROW. In some situations, private field roads or trails would be used. Permission from the property owner would be obtained prior to accessing the transmission line route. New access roads may also be constructed when no current access is available or if the existing access is inadequate.

The safe movement of oversized goods could potentially be impacted by the alternatives. Interstate 94 from St. Cloud to Moorhead is designated as a super haul corridor. Super haul corridors are characterized as routes that can handle a 16-foot height limit, a 16-foot width limit with and 8-foot wide axle, a 130-foot length limit, and a 235,000-pound weight limit. Mn/DOT is responsible for preserving the ability to accommodate these characteristics and improve upon them if feasible.

### 3.4.6 Mitigation – Roadways (Section 5.4.3 of the DEIS)

Before construction begins, some potential impacts can be mitigated via coordination with the appropriate agencies and organizations regarding the placement of structures and construction methods. Final structure locations, ROW, and any disturbed areas could be determined by considering input from responsible transportation agencies (e.g. Mn/DOT, counties, townships) to minimize visual or construction impacts. Structures could be located at the maximum feasible distance from highway and trail crossings within the limits of the structure design. The construction contractor could coordinate construction activities with the appropriate road agencies to avoid interference with their roadway construction and maintenance activities.

Safety Rest Areas are considered to be part of the Mn/DOT right-of-way 23 U.S.C. §109(l)(2); 23 C.F.R. §645.207 and therefore, the provisions in the Utility Accommodation Policy and Minn. Rules part 8810.3300, Subp. 4, that generally prohibit the installation of utility facilities longitudinally along Interstate 94 would apply to safety rest area locations as well. The construction contractor should also work with the appropriate agencies to minimize impacts on roadway clear zones and rest areas.

### ***Trails***

Both routes cross snowmobile and multi-use non-motorized trails. Many of these trails are associated with roadway ROW therefore they are already in the built environment. The Applicant Preferred Route crosses six trails and Route A crosses nine trails. The Route Option 2a would add an additional trail crossing to the Applicant Preferred Route. Finally, AS-1 would have fewer impacts on trails than the AS-2 and Preferred Alternative alternates.

The Red River of the North forms the western border of the proposed project and is included in the Water Trails Program. All of the proposed routes and options would cross this river trail when entering North Dakota. The Otter Tail River was a recently designated water trail located between North Dakota and Alexandria which would be crossed by the Applicant Preferred Route.

### ***Scenic Byways***

Impacts to the designated scenic byways occurring in the vicinity of the Applicant Preferred Route would be limited to crossing the King of Trails and the Glacial Ridge Trail. The Otter Trail scenic byway is east of the Applicant Preferred Route at a distance of at least 1.5 miles and is not located near Route A. The Applicant Preferred Route crosses the King of Trails Scenic Byway, which follows U.S. Highway 75, near the intersection of U.S. Highway 75 and County Road 8 in Clay County. Route A crosses the King of Trails Byway south of Doran and intersection of U.S. Highway 75 and County Road 9 in Wilkin County.

The amended scoping options would also impact the King of Trails Byway. The amended scoping options are alternatives to the Applicant Preferred Route at the western end of the project. AS-1 would cross the King of Trails Byway one time approximately 3.4 miles south of where the Applicant Preferred Route crosses the byway. Amended Scoping Option 2 would cross the byway 3.4 miles south of where the Applicant Preferred Route crosses the byway but would also travel along the byway for approximately 3.5 miles.

**Table 3.4-6. (Table added as a result of comments received) Scenic Byway Impact Evaluation: Routes and Route Options**

Routes and Options Affected	Number of Crossings		Distance Paralleled (Miles)	
	King of Trails Byway	Glacial Ridge Trail	King of Trails Byway	Glacial Ridge Trail
<b>Route Alternatives</b>				
Applicant Preferred Route	1	1	0	0
Route A	1	0	0	0
<b>Option 1</b>				
Applicant Preferred ROW Occupancy	0	0	0	0
Applicant Preferred No ROW Occupancy	0	0	0	0
Option 1	0	0	0	0
<b>Option 2</b>				
Applicant Preferred ROW Occupancy	0	0	1	0
Applicant Preferred No ROW Occupancy	0	0	1	0
Option 2a	0	0	1	0
Option 2b	0	0	1	0
<b>Option 3</b>				
Applicant Preferred ROW Occupancy	0	1	0	0
Applicant Preferred No ROW Occupancy	0	1	0	0
Option 3	0	0	0	0
<b>Amended Scope Options</b>				
Applicant Preferred ROW Occupancy	1	0	0	0
Applicant Preferred No ROW Occupancy	1	0	0	0
Option AS-1	1	0	0	0
Option AS-2 ROW Occupancy	1	0	3.5	0
Option AS-2 No ROW Occupancy	1	0	3.5	0
Option AS-3	0	0	0	0

Transmission lines can create visual impacts on scenic byways; impacts to scenic resources are discussed above.

The Applicant Preferred Route also crosses the Glacial Ridge Trail near the intersections of Interstate 94 and State Highways 27 and 29 south of Alexandria in Douglas County.

Rather than crossing the Glacial Ridge Trail Byway, Option 3, route option for the Preferred Alternative, would parallel a portion of the byway on State Highway 27 for approximately two miles before rejoining the Preferred Alternative Route.

#### **3.4.7 Potential Impacts – Rare and Unique Natural Resources/Critical Habitat (Section 5.9.2)**

The DNR and its partners developed Minnesota’s State Wildlife Action Plan (SWAP), called “Tomorrow’s Habitat for the Wild and Rare,” as a tool to guide wildlife conservation as population growth and associated demands place increasing pressure on the state’s natural resources. SWAP provides conservation actions and priorities for Species of Greatest Conservation Need (SGCN) and their key habitats relative to the ecological subsection. SGCN are defined as species whose populations are rare, declining, or vulnerable to decline and are below levels desirable to ensure long-term health and stability (including threatened and endangered species). Much of the species documentation within Minnesota’s SWAP is provided by the Minnesota County Biological Survey (MCBS). Key habitats are specific to an ecological subsection and are defined as the habitats most important to the greatest SGCN.

Table 3.4-7 identifies the SGCN that are present within one mile and 1,000 feet of the proposed routes, route options, and amended scoping options. There are no SGCN located within the 150 feet proposed ROW for any of the alignments. The Applicant Preferred Route has the greatest potential to impact SGCN.

**Table 3.4-7. (Table added as a result of comments received) Species of Greatest Conservation Need between North Dakota and Alexandria**

<u>Common Name</u>	<u>Scientific Name</u>	<u>Number of Occurrences within 1 mile Route</u>	<u>Number of Occurrences within 1,000' Route</u>	<u>Key Habitat Type for SGCN*</u>
<b>Birds</b>				
Bald eagle	<i>Haliaeetus leucocephalus</i>	Applicant Preferred Route (6), Option 1 Applicant Preferred Route (6), Option 1 (6), Amended Scoping Applicant Preferred Route (2), Amended Scoping 2 (2)	Applicant Preferred Route (1), Amended Scoping Applicant Preferred Route (1), Amended Scoping 2 (1)	Forest- Upland Deciduous (Aspen)
Greater prairie chicken	<i>Tympanuchus cupido</i>	Applicant Preferred Route (6), Amended Scoping Applicant Preferred Route (3), Amended Scoping 2 (3)	Applicant Preferred Route (2), Amended Scoping Applicant Preferred Route (1), Amended Scoping 2 (1)	Prairie
Henslow's sparrow	<i>Ammodramus henslowii</i>	Applicant Preferred Route (3), Option 2 Applicant Preferred Route (1), Option 2B (1)	0	Forest- Lowland Conifer
Marbled godwit	<i>Limosa fedoa</i>	Route A (1)	0	Wetland – Non-forest
<b>Snakes</b>				
Plains hog-nosed snake	<i>Heterodon nasicus</i>	Applicant Preferred Route (1), Amended Scoping Applicant Preferred Route (1), Amended Scoping 2 (1)	0	Grassland
<b>Fishes</b>				
Least darter	<i>Etheostoma microperca</i>	Applicant Preferred Route (3), Option 3 Applicant Preferred Route (1), Option 3 (1)	0	Lake - Deep
Pugnose shiner	<i>Notropis anogenus</i>	Applicant Preferred Route (2)	0	Lake - Deep
<b>Insects</b>				
Powesheik skipper	<i>Oarisma powesheik</i>	Route A (1)	0	Prairie
<b>Invertebrates</b>				
Black sandshell	<i>Ligumia recta</i>	Applicant Preferred Route (3)	Applicant Preferred Route (2)	River – Headwater to large
Creek heelsplitter	<i>Lasmigona compressa</i>	Applicant Preferred Route (1)	Applicant Preferred Route (1)	River – Headwater to large
Fluted-shell	<i>Lasmigona costata</i>	Applicant Preferred Route (3)	Applicant Preferred Route (1)	River – Headwater to large

\*Source: *Tomorrow's Habitat for the Wild and Rare: an Action Plan for Minnesota Wildlife. April 4, 2006.*

Status: END = Endangered, THR = Threatened, SC = Special Concern, NL = Not Listed, NA = No Legal Status.

Rank: S1 = critically imperiled, S2 = imperiled, S3 = vulnerable to extirpation or extinction, S4 = apparently secure, S5 = demonstrably widespread, abundant, and secure. Combined codes (e.g., "S3S4") indicate that the numerical ranking falls between the two ranks. SNR = present in the state or province, but no SRank is available. In Minnesota, SRank reflects Current Status. Thus, E = S1, T = S2, and SC = S3.

***Flora***

Temporary impacts to flora would take place most intensively at the structure locations. Temporary impacts are estimated at one acre per pole. Permanent vegetative changes would take place within the right-of-way. Trees and shrubs that may interfere with maintenance and the safe operation of the transmission line would not be allowed to establish within the right-of-way. Co-locating with existing corridors through wooded areas would reduce the impact on trees and habitats they support. Typically, vegetation is controlled mechanically or with herbicides on a regular maintenance schedule. Vegetation that does not interfere with the safe operation of the transmission line is allowed to reestablish within the right-of-way after construction. In addition, permanent impacts would be required at each pole location. The permanent impacts are estimated at 55 square feet per pole. Vegetation is comprised of wooded and non-wooded lands that are not agriculture. Non-wooded lands are designated as emergent herbaceous wetlands and urban/recreation grasses and wooded lands are designated as deciduous forest, evergreen forest, mixed forest, woody wetlands by the National Land Cover Data (NLCD). Refer to Table 3.4-8 for estimated temporary impacts to vegetation for the proposed route options.

**Table 3.4-8. (Table 5.9-2 in the DEIS) Temporary and Permanent Impacts to Non-Agricultural Vegetation**

Route/Option	Estimated Number of Poles	Temporary Impacts (1 Acre Per Pole) Acres	Permanent Impacts (55 1000 SF Per Pole) SF	Permanent Impacts (55 SF Per Pole 1000-ft) Acres
<b>Route Alternatives</b>				
Applicant Preferred ROW Occupancy	35	35	<del>1,925</del> 4,950	0.04
Applicant Preferred No ROW Occupancy	41	41	<del>2,255</del> 2,229	0.05
Route A	35	35	<del>1,925</del> 4,904	0.04
<b>Route Options</b>				
<b>Route Option 1</b>				
Applicant Preferred ROW Occupancy	0	0	<del>25</del> 0	0
Applicant Preferred No ROW Occupancy	0	0	<del>22</del> 0	0
Option 1	1	1	74 55	< 0.01 0
<b>Route Option 2</b>				
Applicant Preferred ROW Occupancy	5	5	<del>275</del> 257	< 0.01 0
Applicant Preferred No ROW Occupancy	5	5	<del>275</del> 282	< 0.01 0
Option 2a	5	5	<del>275</del> 249	< 0.01 0
Option 2b	6	6	<del>330</del> 342	< 0.01 0
<b>Route Option 3</b>				
Applicant Preferred ROW Occupancy	2	2	<del>110</del> 413	< 0.01 0
Applicant Preferred No ROW Occupancy	2	2	<del>110</del> 434	< 0.01 0
Option 3	3	3	<del>165</del> 464	< 0.01 0
<b>Amended Scope Options</b>				
Option AS-1	2	2	<del>110</del> 89	< 0.01 0
Applicant Preferred ROW Occupancy	3	3	<del>165</del> 475	< 0.01 0
Applicant Preferred No ROW Occupancy	3	3	<del>165</del> 487	< 0.01 0
Option AS-2 ROW Occupancy	1	1	<del>55</del> 76	< 0.01 0
Option AS-2 No ROW Occupancy	2	2	<del>110</del> 87	< 0.01 0
Option AS-3	0	0	0	0

Source: NCLD, 2001

### 3.4.8 Mitigation

#### ***Protected Species***

Where possible, impacts on these species could be prevented by avoiding known locations and potentially suitable habitats during finalization of the transmission line alignment. Where structure placement and/or spanning of transmission lines cannot be avoided in suitable habitats, listed species associated with these habitats could be affected. If project activities within potentially suitable habitat cannot be avoided, surveys could be conducted and the MnDNR could be consulted to ensure impacts on listed species are avoided or minimized.

The special status species associated with wetlands, stream banks, and rivers could be impacted by placement of structures within these habitats, or by increased erosion and sedimentation that could occur if appropriate mitigative measures or Best Management Practices are not employed. Therefore, the Applicant could span rivers, streams, and wetlands throughout the project area to the extent practical, implement the appropriate mitigation measures or practices such as using construction mats to avoid soil compaction, and maintain sound water and soil conservation practices during construction of the project to protect topsoil and adjacent water resources, minimizing soil erosion and sedimentation. However, if it is not feasible to span, surveys could be conducted to determine the presence of state-listed species or suitability of habitat for such species, and coordination could occur with the appropriate agencies to avoid and minimize any associated impacts. Minnesota endangered species law (Minnesota Statutes Section 84.0895) and associated rules (Minnesota Rules Part 6212.1800 to 6212.2300 and 6134) prohibit the taking of endangered or threatened species without a permit. Surveys may be required to determine if takings may occur at seasonally appropriate times. Further, impacts could be mitigated by construction phasing during non-nesting and breeding season to avoid impacts to breeding species.

### **3.5 AFFECTED ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION-ALEXANDRIA TO SAUK CENTRE (SECTION 6 OF THE DEIS)**

#### **3.5.1 Potential Impacts – Human Settlement (Section 6.1.2 of the DEIS)**

##### **Land Use and Zoning**

[Table 3.5-1 and Table 3.5-2, below, have been revised to correct errors.]

Zoning within each route is illustrative of the type of land use that could be impacted by the ultimate 150-foot transmission line alignment. Quantitative data on specific alignments are provided in Table 3.5-1 for the Applicant Preferred Route, Route A, and the route options within the Alexandria to Sauk Centre area. The alignments associated with the Applicant Preferred Route considers ROW occupancy with Interstate 94. The ROW occupancy alignment proposes an alignment within 25 feet of the interstate ROW and the no ROW occupancy alignment proposes no ROW occupancy with Interstate 94.

**Table 3.5-1. (Table 6.1-8 of the DEIS)  
Route Right-of-Way Impact Evaluation for Land Use Route Alternatives**

Route	Acres						
	Agriculture	Residential	Commercial /Industrial	Municipal	Recreation	Special Ag.	Transitional
Applicant Preferred ROW Occupancy	213 <del>322</del>	77 <del>447</del>	3146	0	4466	0	0
Applicant Preferred No ROW Occupancy	322 <del>213</del>	117 <del>77</del>	4634	0	6644	0	0
Route A	482	104	15	0	41	40	0

The proposed routes shown in Table 3.5-1 primarily cross through agricultural and rural residential land; however, the Applicant Preferred Route also includes area on the fringe of Alexandria and Sauk Centre. The primary difference between the two routes is the amount of agricultural, commercial/industrial, recreation, and special agricultural land. The Applicant Preferred Route, within the corridor occupancy options, would affect approximately 30 acres more of commercial/industrial zoned land compared to Route A and approximately 25 additional acres of recreation land. Route A affects approximately 160 more acres of agricultural land, including 40 acres of land zoned for special agricultural uses compared to the Applicant Preferred Route.

**Table 3.5-2 (Table 6.1-9 of the DEIS). Route Option Evaluation for Land Use: Option Areas**

Option	Acres						
	Agriculture	Residential	Commercial / Industrial	Municipal	Recreation	Special Ag.	Transitional
<b>Option 4</b>							
Route A	59	32	0	0	0	0	0
Option 4	67	10	0	0	14	0	0
<b>Option 5</b>							
Applicant Preferred ROW Occupancy	34 <del>52</del>	0	0	0	23 <del>3</del>	0	0
Applicant Preferred No ROW Occupancy*	5 <del>234</del>	0	0	0	32 <del>2</del>	0	0
Option 5	55	0	0	0	5	0	0
<b>Option 6</b>							
Applicant Preferred ROW Occupancy	75 <del>444</del>	9 <del>43</del>	928 <del>28</del>	0	943 <del>43</del>	0	0
Applicant Preferred No ROW Occupancy*	114 <del>75</del>	13 <del>9</del>	289 <del>9</del>	0	439 <del>9</del>	0	0
Option 6	220	8	1	0	1	0	0
<b>Option 7</b>							
Route A	59	0	0	0	0	0	0
Option 7	41	0	0	0	0	0	0

**Noise**

The Alexandria Substation is an existing substation which is being upgraded. It is currently not within a noise sensitive location and the upgrades are not anticipated to increase noise noticeably. The proposed Quarry Substation near St. Cloud is being sited within an area zoned either municipal or industrial, is not near noise sensitive land uses, and is therefore not anticipated to present any noise guideline exceedances. The Quarry Substation was reviewed in the Monticello to St. Cloud 345 kV Transmission Line Project EIS.

**3.5.2 Affected Environment – Recreation (Section 6.3.1 of the DEIS)**

**Trails**

The Option 5 alternative route to the Applicant Preferred Route parallels County Road 51 and the Stearns County Trail that connects the Central Lakes Trail in Osakis and the Lake Wobegon Trail in Sauk Centre.

Option 6 includes a north/south connector between the Applicant Preferred Route and Route A is within one mile of the Stearns County Trail that connects the Central Lakes Trail in Osakis and the Lake Wobegon Trail in Sauk Centre. Refer to Appendix H for maps of recreational resources.

### **Water Trails**

MnDNR's Water Trails program manages more than 30 water trails that flow through more than 4,000 miles of rivers in Minnesota. These water trails are managed for canoeing and kayaking. The program promotes the exploration of water trails throughout the state and includes the Sauk River which was a recently designated water trail.

The Sauk River travels through Sauk Centre in a north south direction where it would be crossed by the Applicant Proposed Route, Route A, and Option 6 as the routes travel eastward from Sauk Centre.

### **3.5.3 Potential Impacts – Recreation (Section 6.3.2 of the DEIS)**

#### **Trails**

The Burgen Lake wayside rest area/Red River Ox Cart Trails historical marker is located in the Applicant Preferred Route along the westbound travel lanes of Interstate 94. Refer to Appendix H for maps of recreational resources.

### **3.5.4 Mitigation – Recreation (Section 6.3.3 of the DEIS)**

Based on a viewer's response and sensitivity, the presence of transmission lines can detract from the visual attractions of an area. Wherever possible, the proposed transmission lines could be routed alongside existing power lines and section lines, as well as within road, rail, and utility ROWs, to minimize any adverse impacts.

#### **Recreational Land and Trails**

No impacts on recreational uses that would alter or limit the use of these resources are anticipated, therefore, no mitigative measures are proposed.

#### **Scenic Byways**

Scenic byways are roadways designated because of their scenic qualities as well as their history, views, and context. Impacts to scenic byways could be minimized through avoidance or minimizing byway crossings. Visual impacts would be greater on byways that are paralleled versus crossed at a single location.

Potential Mitigation measures could include the following.

- Undergrounding the transmission line.
- Structures could be located at the maximum feasible distance from highway and trail crossings within the limits of the structure design.

- Along existing roadways, transmission line alignments could be placed at locations with the fewest impacts to existing ROW.
- Visual screening with vegetation could be considered in the foreground where the route parallels scenic byways but due to the height of the structure and the transmission lines may still be visible in the background.

### **Visual and Aesthetic Resources**

Based on a viewer's response and sensitivity, the presence of transmission lines can detract from the visual attractions of an area. Wherever possible, the proposed transmission lines could be routed alongside existing power lines and section lines, as well as within road, rail, and utility ROWs, to minimize any adverse impacts.

#### **3.5.5 Potential Mitigation Transportation (Section 6.4.2 of the DEIS)**

The safe movement of oversized goods could potentially be impacted by the alternatives. Interstate 94 from St. Cloud to Moorhead is designated as a Super haul corridor. Super haul corridors are characterized as routes that can handle a 16-foot height limit, a 16-foot width limit with an 8-foot wide axle, a 130-foot length limit, and a 235,000-pound weight limit. Mn/DOT is responsible for preserving the ability to accommodate these characteristics and improve upon them if feasible.

#### **Mn/DOT's Safety Rest Area Program**

Mn/DOT's Safety Rest Area Program is currently developing a strategic plan for redevelopment of the interstate rest area system in Minnesota. The plan may propose the development of rest areas in new locations along interstate highways in Minnesota and potentially the abandonment or reuse of existing interstate rest areas. The Applicant Preferred route traveling along Interstate 94 could impact Mn/DOT's operations by either restricting available options for locating future safety rest areas or requiring potential relocation of transmission lines.

#### **Temporary Construction Impacts**

Most of the transportation related impacts due to the project would be from construction activities and would also be temporary in nature. Temporary access for the construction of the new transmission lines would require a 20-foot-wide access trail constructed within the transmission line ROW or by short spur trails from the existing road network to the ROW. In some situations, private field roads or trails would be used. Permission from the property owner would be obtained prior to accessing the transmission line route. New access roads may also be constructed when no current access is available or if the existing access is inadequate.

#### **3.5.6 Mitigation – Roadways and Airports (Section 6.4.3 of the DEIS)**

Following is a discussion for mitigation on roadways and airports.

### **Roadways**

Before construction begins, some potential impacts can be mitigated via coordination with the appropriate agencies and organizations regarding the placement of structures and construction methods. Final structure locations, ROW, and any disturbed areas could be determined by considering input from responsible transportation agencies (e.g. Mn/DOT, counties, townships) to minimize visual or construction impacts. Structures could be located at the maximum feasible distance from highway and trail crossings within the limits of the structure design. The construction contractor could coordinate construction activities with the appropriate road agencies to avoid interference with their roadway construction and maintenance activities. Safety Rest Areas are considered to be part of the Mn/DOT right-of-way 23 U.S.C. §109(l)(2); 23 C.F.R. §645.207 and therefore, the provisions in the Utility Accommodation Policy and Minn. Rules part 8810.3300, Subp. 4, that generally prohibit the installation of utility facilities longitudinally along Interstate 94 would apply to safety rest area locations as well. The construction contractor should also work with the appropriate agencies to minimize impacts on roadway clear zones and rest areas.

#### **3.5.7 Affected Environment – Natural Land Resources (Section 6.9.1 of the DEIS)**

The Lake Osakis Important Bird Area (IBA) is over 20,000 acres in size. This IBA supports major breeding populations of several important nongame bird species. Lake Osakis is a PWI located approximately two miles north of the Applicant Preferred Route between Alexandria and Sauk Centre. According to MnDNR, Clifford Lake is within the boundary of the Lake Osakis IBA. This lake is adjacent to Interstate 94 and represents a high waterbird concentration area. Further, Lake Osakis contains the eastern-most significant Western grebe (*Aechmophorus occidentalis*) colony in North America, as well as the most significant red-necked grebe (*Podiceps grisegena*) colony in Minnesota.

[Table 3.5-3 below has been revised to correct errors.]

Temporary impacts to flora would take place most intensively at the structure locations. Temporary impacts are estimated at one acre per pole. Permanent vegetative changes would take place within the right-of-way. Trees and shrubs that may interfere with maintenance and the safe operation of the transmission line would not be allowed to establish within the right-of-way. Co-locating with existing corridors through wooded areas would reduce the impact on trees and habitats they support. Typically, vegetation is controlled mechanically or with herbicides on a regular maintenance schedule. Vegetation that does not interfere with the safe operation of the transmission line is allowed to reestablish within the right-of-way after construction. In addition, permanent impacts would be required at each pole location. The permanent impacts are estimated at 55 square feet per pole. Vegetation is comprised of wooded and non-wooded lands that are not agriculture. Non-wooded lands are designated as emergent herbaceous wetlands and urban/recreation grasses and wooded lands are designated as deciduous forest, evergreen forest, mixed forest, woody wetlands by the National Land Cover Data (NLCD). Refer to Table 3.4-8. for estimated temporary impacts to vegetation for the proposed route options.

**Table 3.5-3 (Table 6.9-2. of the DEIS) Temporary and Permanent Impacts to Non-Agricultural Vegetation (Alexandria to Sauk Centre)**

Vegetation by Route/Option	Estimated Number of Poles in Vegetated Cover	Temporary Impacts (1 Acre Per Pole) Acres	Permanent Impacts (55 SF Per Pole) SF	Permanent Impacts (55 SF Per Pole) Acres
<b>Route Alternatives</b>				
Applicant Preferred ROW Occupancy	38	38	2,090 <del>2,080</del>	0.04
Applicant Preferred No ROW Occupancy	41	41	2,255 <del>2,275</del>	0.05
Route A	47	47	2,585 <del>2,574</del>	0.06
<b>Option 4 Alternatives</b>				
Route A	12	12	660 <del>652</del>	0.01
Option 4	8	8	440 <del>464</del>	0.01
<b>Option 5 Alternatives</b>				
Applicant Preferred ROW Occupancy	1	1	55 <del>52</del>	0
Applicant Preferred No ROW Occupancy	2	2	110 <del>128</del>	0
Option 5	1	1	55 <del>64</del>	0
<b>Option 6 Alternatives</b>				
Applicant Preferred ROW Occupancy	14	14	770 <del>762</del>	0.02
Applicant Preferred No ROW Occupancy	14	14	770 <del>763</del>	0.02
Option 6	17	17	935 <del>944</del>	0.02
<b>Option 7 Alternatives</b>				
Route A	2	2	110 <del>108</del>	0
Option 7	2	2	110 <del>135</del>	0

Source: NCLD, 2001

**3.5.8 Potential Impacts – Rare and Unique Natural Resources/Critical Habitat (Section 6.9.2 of the DEIS)**

The DNR and its partners developed Minnesota’s State Wildlife Action Plan (SWAP), called “Tomorrow’s Habitat for the Wild and Rare” as a tool to guide wildlife conservation as population growth and associated demands place increasing pressure on the state’s natural resources. The SWAP provides conservation actions and priorities for Species of Greatest Conservation Need (SGCN) and their key habitats relative to the ecological subsection. SGCN are defined as species whose populations are rare, declining, or vulnerable to decline and are below levels desirable to ensure long-term health and stability (including threatened and endangered species). Much of the species documentation within Minnesota’s SWAP is provided

by the Minnesota County Biological Survey (MCBS). Key habitats are specific to an ecological subsection and are defined as the habitats most important to the greatest SGCN.

Table 3.5-4 identifies the SGCN that are present within one mile and 1,000 feet of the proposed routes, route options, and amended scoping options. There are no SGCN located within the 150-foot proposed ROW for any of the alignments. The Applicant Preferred Route and Route A have the potential to impact SGCN similarly, but only the Applicant Preferred Route is located within one mile of the Henslow's sparrow, which is an endangered species, and the Bald eagle.

**Table 3.5-4 (This table was added to the FEIS as a result of comments). Species of Greatest Conservation Need between Alexandria and Sauk Centre**

<u>Common Name</u>	<u>Scientific Name</u>	<u>Number of Occurrences within 1 mile Route</u>	<u>Number of Occurrences within 1000' Route</u>	<u>Key Habitat Type for SGCN*</u>
<b>Mammals</b>				
Prairie Vole	<i>Microtus ochrogaster</i>	Applicant Preferred Route (2), Route A (2), Option 4 (1) and Route A(1)	0	Shrub/woodland - Upland
<b>Birds</b>				
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Applicant Preferred Route (1), Option 6 Applicant Preferred Route (1)	0	Forest- Upland Deciduous (Aspen)
Henslow's sparrow	<i>Ammodramus henslowii</i>	Applicant Preferred Route (1)	0	Prairie
Marbled Godwit	<i>Limosa fedoa</i>	Applicant Preferred Route (1), Route A (1), Option 5 (1)	Applicant Preferred Route (1), Route A (1), Option 5 (1)	Prairie
<b>Fishes</b>				
Least darter	<i>Etheostoma microperca</i>	Applicant Preferred Route (1), Route A (1), Option 4 (1), Option 4A (1)	0	Lake - Deep
Pugnose shiner	<i>Notropis anogenus</i>	Applicant Preferred Route (1), Route A (1), Option 4 (1), Option 4A (1)	0	Lake - Deep

\*Source: *Tomorrow's Habitat for the Wild and Rare: an Action Plan for Minnesota Wildlife*. April 4, 2006.

Status: END = Endangered, THR = Threatened, SC = Special Concern, NL = Not Listed, NA = No Legal Status.

Rank: S1 = critically imperiled, S2 = imperiled, S3 = vulnerable to extirpation or extinction, S4 = apparently secure, S5 = demonstrably widespread, abundant, and secure. Combined codes (e.g., "S3S4") indicate that the numerical ranking falls between the two ranks. SNR = present in the state or province, but no SRank is available. In Minnesota, SRank reflects Current Status. Thus, E = S1, T = S2, and SC = S3.

### 3.5.9 Mitigation – Rare and Unique Natural Resources (Section 6.9.3 of the DEIS)

#### Protected Species

Where possible, impacts on these species could be prevented by avoiding known locations and potentially suitable habitats during finalization of the transmission line alignment. Where structure placement and/or spanning of transmission lines cannot be avoided in suitable habitats, listed species associated with these habitats could be affected. If project activities within

potentially suitable habitat cannot be avoided, surveys could be conducted and the MnDNR could be consulted to ensure impacts on listed species are avoided or minimized.

The special status species associated with wetlands, stream banks, and rivers could be impacted by placement of structures within these habitats, or by increased erosion and sedimentation that could occur if appropriate mitigative measures or Best Management Practices are not employed. Therefore, the Applicant could span rivers, streams, and wetlands throughout the project area to the extent practical, implement the appropriate mitigation measures or practices such as using construction mats to avoid soil compaction, and maintain sound water and soil conservation practices during construction of the project to protect topsoil and adjacent water resources, minimizing soil erosion and sedimentation. However, if it is not feasible to span, surveys could be conducted to determine the presence of state-listed species or suitability of habitat for such species, and coordination could occur with the appropriate agencies to avoid and minimize any associated impacts. Minnesota endangered species law (Minnesota Statutes Section 84.0895) and associated rules (Minnesota Rules Part 6212.1800 to 6212.2300 and 6134) prohibit the taking of endangered or threatened species without a permit. Surveys may be required to determine if takings may occur t seasonally appropriate times. Further, impacts could be mitigated by construction phasing during non-nesting and breeding season to avoid impacts to breeding species.

### **3.6 AFFECTED ENVIRONMENT, POTENTIAL IMPACTS, AND MITIGATION- SAUK CENTER TO ST CLOUD (SECTION 7 OF THE DEIS)**

#### **3.6.1 Affected Environment – Human Settlement (Section 7.1 of the DEIS)**

##### **Land Use and Zoning**

The land use study area includes all land within the routes and adjacent properties. Land uses in this area include agricultural, residential, and commercial uses. Agricultural uses predominate; commercial uses are located in and adjacent to the incorporated areas where development densities are higher. Interspersed commercial and industrial uses occur along I-94 and other existing roadways. Zoning near these incorporated areas include residential, commercial, and industrial uses. Existing land use in the area is predominantly agricultural or undeveloped land; however, low density, single-family, or rural residential uses also occur. Table 3.6-1 shows the area of agricultural, residential, and commercial/industrial zoning within the routes and route options.

Table 3.6-1. (Table 7.1-4 in the DEIS) Zoning Within Each Route

Route	Acres and Percentage of Zoned Land Use						
	Agriculture	Residential	Commercial / Industrial	Municipal	Recreation	Special Agricultural	Transitional
Applicant Preferred	10,196 (91.7%)	90 (.8%)	723 (6.5%)	38 (.3%)	73 (.7%)	0 (0)	0 (0)
Route A	10,032 (93%)	89 (.8%)	649 (6%)	17 (.2%)	12 (.1%)	0 (0)	0 (0)
Route B	5,535 (97%)	87 (2%)	37 (1%)	41 (1%)	30 (1%)	0 (0)	0 (0)
Route C	4,835 (91%)	80 (1%)	281** 175 (5%)	62 (1%)	82 (2%)	0 (0)	0 (0%)
Route D	4,233 (80%)	305 (6%)	454 *** 34 (9%)	201 (4%)	72 (1%)	0 (0)	0 (0)
Route E	6,112 (92%)	122 (2%)	199 (3%)	37 (1%)	81 (1%)	0 (0)	102 (2%)
Route F	5,303 (77%)	313 (5%)	823 (12%)	40 (1%)	193 (3%)	212 (3%)	0 (0)
Route G	6,038 (94%)	79 (1%)	141 (2%)	37 (1%)	29 (0)	0 (0)	102 (2%)
Route H	5,976 (93%)	79 (1%)	128 (2%)	103 (2%)	31 (0)	0 (0)	102 (2%)
<b>Route Options *</b>							
Option 8	68 (100%)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Option 9	530 (89.1%)	10 (1.7%)	48 (8.1%)	6 (1.0%)	1 (0.2%)	0 (0)	0 (0)
Option 10	196 (100%)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Option 11	376 (100%)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Amended Scope Options</b>							
Option AS-4	696 (100%)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Option AS-5	167 (79.1%)	37 (17.5%)	0 (0)	7 (3.3%)	0 (0)	0 (0)	0 (0)

\*Option 12 includes segments of Route B or Route E, and, therefore, was not included in the table

\*\* 175 acres within Route C associated with St. John's University are zoned as Educational/Ecclesiastical.

\*\*\* 34 acres within Route D associated with St. John's University are zoned as Educational/Ecclesiastical.

Tables 3.6-2 and 3.6-3, include revisions to the residences as a result of information submitted through public comment.

**Displacement**

Table 3.6-2 shows the number of residential and nonresidential structures within the 1,000-foot routes for each alternative. To the extent feasible, the proposed 345 kV transmission line can be designed by the Applicant so that all existing residences are located outside of the required ROW. Approximately 200 residences are located within Routes D, F, A, and B. Route C includes the smallest number of residences at ~~83~~85.

**Table 3.6-2. (Table 7.1-5 of the DEIS) Residences and Nonresidential Structures Located Within Routes Areas**

Route	Structures Within 1,000-Foot Routes and Substation Areas	
	Residences	Nonresidential Structures
Applicant Preferred	465 191	409
Route A	490-215	470
Route B	490 193	223
Route C	<del>83</del> 85	146
Route D	220	210
Route E	91	279
Route F	218	141
Route G	98	251
Route H	99	249

**Table 3.6-3. (Table 7.1-6 of the DEIS) Residences and Nonresidential Structures Located Within Route Option Areas**

Option	Structures Within 1,000-Foot Routes and Substation Areas	
	Residences	Nonresidential Structures
<b>Route Options *</b>		
Option 8	0	0
Option 9	7	3
Option 10	0 1	0
Option 11	4	1
<b>Amended Scope Options</b>		
Option AS-4	5	26
Option AS-5	2	3

\*Option 12 includes segments of Route B or Route E, and, therefore, was not included in the table

**Displacement**

Displacement of residences and commercial or industrial properties can occur when the transmission line ROW cannot avoid such structures. In such a situation, the property and the structures on it are acquired, and the occupant(s) of the structures are relocated to a new residence or business location. No likely displacement locations within the proposed ROWs were identified. Other nonresidential buildings are also located within the transmission line routes which include commercial buildings and residential accessory structures.

Table 3.6-4 (Table 7.1-11 shows the number of residential and nonresidential structures within 500 feet of the proposed ROW centerline for each route.

**Table 3.6-4 (Table 7.1-11 of the DEIS) Route Right-of-Way Impact Evaluation for Displacements: Routes**

Route	Residences within Proximity of Alignment (Feet)				
	0-75	75-150	150-300	300-500	Total within 500
Applicant Preferred ROW Occupancy	0 1	8 7	46 50	29 35	83 93
Applicant Preferred No ROW Occupancy	0 1	8 7	46 50	28 34	82 92
Route A	0	21	57 60	38 44	116 125
Route B	0	30	106	55 58	191 194
Route C	4 2	9 8	41 42	26 27	77 79
Route D	9	20	75	75	179
Route E	0	12	37	27	76
Route F	1	9	97	99	206
Route G	0	9	49	30	88
Route H	0	10	57	29	96

**Table 3.6-5. (Table 7.1-12 of the DEIS) Route Option Evaluation for Displacements: Option Areas**

Option	Residences within Proximity of Alignment (Feet)*				
	0-75	75-150	150-300	300-500	Total within 500
<b>Option 8</b>					
Applicant Preferred Route	0	0	0	0	0
Option 8	0	0	0	0	0
<b>Option 9</b>					
Applicant Preferred ROW Occupancy	0	0	1	2	3
Applicant Preferred No ROW Occupancy	0	0	1	2	3
Option 9	0	1	3	3	7
<b>Option 10</b>					
Route A	0	0	1	0	1
Option 10	0	0	0	0	0
<b>Option 11</b>					
Route E	0	1	7	3	11
Option 11	0	1	2	1	4
<b>Option 12</b>					
Route B	0	0	2	1	3
Route E	0	0	0	0	0
<b>Amended Scope Options</b>					
Route D/E *	1	11	0	0	0
Option AS-5	0	0	2	2	4
<b>Underground Options*</b>					
Route D Undergrounding Freeport*	0	0	1	21	22
Route D Above Ground Freeport	1	0	4	17	22
Route D Undergrounding Albany*	1	0	0	3	4
Route D Above Ground Albany	1	0	1	2	4
Route D Undergrounding Avon*	0	1	21	76	98
Route D Above Ground Avon	5	10	43	40	98

\*Proximity of residences to the undergrounding sections were measured at 0-30 feet, 30 to 60 feet, 60 to 180 feet and 180 to 500 feet to be consistent with the ROW proximity proportions for the above ground alternatives.

\*Route D/E is a combination of a 1 miles long segment of Route D that parallels Interstate 94 and a 1 mile long segment of Route E that parallels State Highway 138 in the Quarry substation area. Route D/E was developed as a comparable route to AS-5.

### 3.6.2 Potential Impacts – Human Settlement (Section 7.1.2 of the DEIS)

#### Land Use and Zoning

The construction and operation of a transmission line can impact existing and planned land uses and local zoning through the conversion of existing land use to transmission line ROW. Within the route alternatives, the majority of land is used for agriculture or is zoned for agricultural use. Therefore this land use type would be most likely to be affected by the Project. However, these impacts are anticipated to be limited to pole locations, and the majority of the transmission line ROW could continue to be used for agricultural purposes.

Zoning within each route is illustrative of the type of land use that could be impacted by the ultimate 150-foot transmission line alignment. Quantitative data on specific alignments is provided in Table 3.6-6 and [Table 3.6-7](#) for the all the routes and the route options within the Sauk Centre to St. Cloud study area. The alignments associated with the Applicant Preferred Route consider occupancy of Interstate 94 ROW. The ROW Occupancy alignment proposes an alignment within 25 feet of the Interstate 94 ROW and the no ROW occupancy alignment proposes no overlap of transmission line ROW.

**Table 3.6-6. (Table 7.1-9 of the DEIS) Route Right-of-Way Impact Evaluation for Land Use: Route Alternatives**

Route	Acres						
	Agriculture	Residential	Commercial / Industrial	Municipal	Recreation	Special Ag.	Transitional
Applicant Preferred ROW Occupancy	533	6	25	3	5	0	0
Applicant Preferred No ROW Occupancy	813	9	33	4	7	0	0
Route A	831	3	30	1	0.3	0	0
Route B	812	14	7	6	0.3	0	0
Route C	649	19	34	10	5	0	0
Route D	527	57	64	30	6	0	0
Route E	768	10	4	4	1	0	10
Route F	696	41	120	5	11	32	0
Route G	781	9	3	4	0.05	0	10
Route H	782	9	3	13	0	0	10

Agricultural zoning and land use would be affected the most by all of the proposed routes shown in Table 3.6-6. The primary difference among the routes is the amount of developed land uses that would be affected. Routes C, D, and F are located within several municipalities and therefore cross more urban zoning and land uses than the remaining routes which primarily

affect rural areas. Greater effects to residential and commercial/industrial zoning and land use would occur with these three routes mainly due to their proximity to the municipalities in this study area. Route D follows Interstate 94, crossing through the edges of Freeport, Albany, and Avon. As a result Route D affects the least amount of agricultural land among all the routes.

Effects from either route on planned land uses as identified in the future land use plans for each affected jurisdiction would vary. According to the 2003 comprehensive plan for the city of St. Cloud, the Preferred Route would not affect areas identified as primary growth areas, secondary growth areas, or ultimate service areas. However, future development areas for the cities of St. Joseph and Waite Park have been identified in comprehensive plans for development, and land has been purchased and some infrastructure (sewer and water) has been put in place. The Applicant Preferred route crosses an orderly annexation area in St. Wendel Township west of St. Joseph and Waite Park. Further, there is population growth potential in St. Wendel Township west of St. Joseph and Waite Park.

### **3.6.3 Affected Environment – Recreation and Aesthetic Resources (Section 7.3.1)**

#### **Recreation Land**

Recreational uses occurring within or adjacent to the proposed routes and options include: Waterfowl Production Areas (WPAs), Wildlife Management Areas (WMAs), Scientific and Natural Areas (SNAs), a State Forest, lakes, rivers, local and regional trails, a local and county park, golf courses, and other recreational uses. Many of the lakes in the area provide boat access and fishing. The Sauk River has carry-in access for non-motorized boaters. Waysides associated with popular lakes provide recreational opportunities.

There are no federal or state parks in the project routes. The Spring Hill Stearns County Park is an 82-acre park traversed by one mile of the Sauk River in the project area. The park is located seven miles south of New Munich and five miles northwest of St. Martin off CSAH 12. Park amenities include a shelter, horseshoe pits, play area, carry-in boat access, primitive camping, snowmobiling trail, natural areas, and prairie remnant and restoration sites.

WPAs are federal conservation lands that provide for wildlife viewing, hiking, and other recreational uses while also conserving waterfowl and their associated habitats. State WMAs make up an important part of Minnesota's outdoor recreation system, protecting those lands and waters that have a high potential for wildlife production, public hunting, trapping, fishing, hiking, wildlife viewing, and other compatible recreational uses.

On August 10, 1933, all of St. John's land (at that time 2,430 acres) was designated as a Minnesota Statutory Game Refuge under MN Statute 97A.085.

Lands generally grouped as recreational use areas, which would otherwise include local parks and open space, occur within the counties and incorporated communities affected by the routes. Table 3.4-2 shows the area of parks, open space, and recreation land within each route and option.

**Trails**

The Lake Wobegon Trail is a significant regional trail in the project area. The Lake Wobegon Trail is a 46-mile long, regional trail that extends from the Central Lakes Trail in Osakis to St. Joseph. The trails generally parallel Interstate 94 to the north. The Glacial Lakes State Trail is a multi-use non-motorized trail in Stearns and Kandiyohi Counties. According to the MnDNR, the Glacial Lakes State Trail is located on a former Burlington Northern Railroad grade and is a popular tourist destination because of the many lakes in the area. Further, towns located along the trail provide access points, rest stops and other services to trail users (MnDNR, 2010b) Refer to Appendix H for maps of recreational resources.

MnDNR's Water Trails program manages over 30 water trails that flow through more than 4,000 miles of rivers in Minnesota. These water trails are managed for canoeing and kayaking. The program promotes the exploration of water trails throughout the state and includes the Sauk River which was a recently designated water trail.

**Scenic Byways**

The Great River Road designated scenic byway travels through St. Cloud but is located more than a mile from the project routes and options. Diagram 7-2 shows the general location of the Great River Road; refer to Appendix H for a more detailed view of the project area in relation to the Great River Road.

While not a designated scenic byway, approximately six miles of Interstate 94 near Saint Joseph travels through the Collegeville Game Refuge. This area is recognized for its scenic quality since the interstate was constructed.

**Water Trails**

The Sauk River was a recently designated water trail and would be crossed by several proposed alignments as shown in the table below in some cases multiple times as the river travels south from Sauk Centre around the southern alignments and then north towards St. Cloud. Refer Table 3.6-7 below for Water Trail crossings.

**Table 3.6-7. (Table was added as a result of comments received) Water Trail Impact Evaluation: Routes and Route Option Alternatives**

Route/Option	Number of Water Trail Crossings
	Sauk River
<b>Route Alternatives</b>	
Applicant Preferred Route	3
Route A	1
Route B	1
Route C	3
Route D	3
Route E	3
Route F	5
Route G	3
Route H	3
<b>Option 8</b>	
Applicant Preferred	0
Option 8	0
<b>Option 9</b>	
Applicant Preferred ROW Occupancy	1
Applicant Preferred No ROW Occupancy	1
Option 9	1
<b>Option 10</b>	
Route A	0
Option 10	0
<b>Option 11</b>	
Route E	0
Option 11	0
<b>Option 12</b>	
Route E	0
Route B Segments	0
<b>Amended Scope Options</b>	
Option AS-4	0
Option AS-5	1
<b>Undergrounding Options</b>	
Route D Undergrounding Freeport	0
Route D Undergrounding Albany	0
Route D Undergrounding Avon	0

### 3.6.4 Potential Impacts – Recreation (Section 7.3.2 of the DEIS)

#### Recreation Land

##### Route C

Route C is similar to the Applicant Preferred Route between Sauk Centre and Avon except where it diverges south towards Avon to parallel Interstate 94. One WPA, one WMA, and one SNA are within one mile of Route C from Sauk Centre to St. Cloud. Route C crosses the Sauk River, which has carry-in access for non-motorized boaters. East of Albany, the route is adjacent to Pine Lake and Pelican Lake, both of which have boat access. Where the Route parallels Interstate 94 it bisects travels through the Colledgeville (St. John's) Game Refuge which is a large 2,430-acre refuge open to firearms deer and bear hunting during the established seasons, by written permission of the landowner.

St. John's University land is also heavily used for outdoor recreation and environmental education. A unique wooden footbridge was installed when the freeway was built to allow a pedestrian connection between St. John's University trails on both sides of the interstate. This bridge also now connects directly to the Wobegon trail. According to information provided by the University, in FY 2010, 6,769 K-12 students plus 4,733 citizens participated in environmental education events on the land at St. John's. Thousands of visits to the land were also recorded by the nearly 4,000 college students who attend the College of St. Benedict and St. John's University. There are thousands of alumni and guests of St. John's that visit the land to enjoy the miles of hiking and ski trials and participate in several environmentally focused events.

##### Route D

Route D is similar to the Applicant Preferred Route from Sauk Centre to Freeport where both alignments parallel Interstate 94. Between Freeport and St. Joseph Route D parallels Interstate 94 except for approximately three miles where it diverges north to parallel the Lake Wobegon Trail near Avon. One WPA, one WMA, two SNAs, and one State Game Refuge are within one mile of Route D from Sauk Centre to St. Cloud. Route D crosses the Sauk River twice, which has carry-in access for non-motorized boaters. The Albany Golf Club Golf Course is within Route D on the north side of Interstate 94.

There are two wayside rest areas along the route. The Big Spunk Lake wayside rest area is on the eastbound side of Interstate 94 and the Middle Spunk Lake wayside rest area is located on the westbound side of Interstate 94. This area is recognized by Mn/DOT as the Upper Spunk Lake Safety Rest Area. The site was selected by the state to take advantage of scenic views of Upper Spunk Lake.

Mn/DOT's Safety Rest Area Program is currently developing a strategic plan for redevelopment of the interstate rest area system in Minnesota. The plan may propose the development of rest areas in new locations along interstate highways in Minnesota and potentially the abandonment or reuse of existing interstate rest areas. Route D traveling along Interstate 94 could impact Mn/DOT's operations by either restricting available options for locating future safety rest areas

or requiring potential relocation of transmission lines. The wayside rest areas include public amenities, play areas, interpretive signage, and picnicking opportunities. Both lakes have boat access and Middle Spunk Lake has a fishing pier. While they are in the proposed route, the alignment travels to the south of the areas.

Where the route parallels the Wobegon trail, about a half mile is adjacent to the Collegetown (St. John's) Game Refuge, which is a 2,430-acre refuge open to firearms deer during the established seasons, by written permission of the landowner. St. John's land is also heavily used for outdoor recreation and environmental education and is described above under Route C.

### **Route D Undergrounding**

The undergrounding option near Freeport is not located within one mile of any WPAs, WMAs, or SNAs and would not impact any additional recreational resources.

The undergrounding option near Albany is not located within one mile of any WPAs, WMAs, or SNAs and would not impact any additional recreational resources.

The undergrounding option west of Avon is parallel to the south side of Interstate 94 which is less than 200 feet from Big (Upper) Spunk Lake. The undergrounding option begins less than 300 feet east of the Big Spunk Lake wayside rest area is on the eastbound side of Interstate 94. A transition station for this undergrounding option could be visible from the rest area. However, undergrounding the transmission line at this location would minimize the impacts to the rest area that would be created by Route D. The wayside rest area includes public amenities, play areas, interpretive signage, and picnicking opportunities. There is a boat access for the lake nearby. South of Avon the undergrounding option ROW is less than 20 feet from Minnie Lake, a small lake located adjacent to CSAH 9. West of St. Joseph, where the option is parallel to the Lake Wobegon Trail, approximately 0.5 miles travels through the Collegetown (St. John's) Game Refuge, which is a 2,430-acre refuge open to firearms deer and bear hunting during the established seasons, by written permission of the landowner.

### **Trails**

#### **Route C**

Route C is similar to the Applicant Preferred Route between Sauk Centre and Avon. Route C crosses several local snowmobile and multi-use non-motorized Stearns County Trails. Route C crosses a Stearns County trail that travels south from Melrose on 335<sup>th</sup> Avenue. The route crosses a north/south oriented Stearns County trail on County Highway 12 to New Munich. West of Freeport the route is less than a mile south of the Lake Wobegon Trail. It then crosses the Lake Wobegon Trail on the west side of Freeport. Route C crosses a north/south oriented Stearns County trail that travels through Freeport. Route C crosses the unique wooden covered pedestrian bridge connecting St. John's trails on both sides of Interstate 94. This bridge also provides a direct connection to the Wobegon Trail. Southeast of St. Anthony, Route C crosses a Stearns County trail that connects St. Anthony to Albany. The route also parallels an east/west segment of a Stearns County trail on 380<sup>th</sup> Street for approximately one mile. Additionally, in the

same area, the route crosses another segment of the Lake Wobegon Trail that extends northeast from Albany towards Two River Lake. Route C crosses the Lake Wobegon Trail again, east of Avon.

### **Scenic Byways**

No scenic byways are impacted between Sauk Centre to St. Cloud.

Approximately six miles of Interstate 94 bisecting St. John's is recognized for its scenic quality. In 1976, an agreement was made by the State to rebuild the 69 KV line off of the right-of-way visible from Interstate 94. It was moved about a third of a mile north behind the hills. According to St John's University the written intent was to "save an appreciable number of trees" and "improve the aesthetics" for the travelling public on Interstate 94.

### **3.6.5 Mitigation – Recreation (Section 7.3.3 of the DEIS)**

No impacts on recreational uses that would alter or limit the use of these areas are anticipated, therefore, no mitigative measures are proposed.

Safety Rest Areas are considered to be part of the Mn/DOT right-of-way 23 U.S.C. §109(l)(2); 23 C.F.R. §645.207 and therefore, the provisions in the Utility Accommodation Policy and Minn. Rules part 8810.3300, Subp. 4, that generally prohibit the installation of utility facilities longitudinally along Interstate 94 would apply to safety rest area locations as well. Avoidance of the safety rest area along Route D could mitigate potential impacts to the areas. If Route D is selected, the undergrounding option for Route D at the Upper Spunk Lake Safety Rest Area would minimize visual impacts to the area.

### **3.6.6 Potential Impacts – Roads (Section 7.4.2 of the DEIS)**

The safe movement of oversized goods could potentially be impacted by the alternatives. Interstate 94 from St. Cloud to Moorhead is designated as a super haul corridor. Super haul corridors are characterized as routes that can handle a 16-foot height limit, a 16-foot width limit with an 8-foot wide axle, a 130-foot length limit, and a 235,000 lbs weight limit. Mn/DOT is responsible for preserving the ability to accommodate these characteristics and improve upon them if feasible.

### **Mn/DOT's Safety Rest Area Program**

Mn/DOT's Safety Rest Area Program is currently developing a strategic plan for redevelopment of the interstate rest area system in Minnesota. The plan may propose the development of rest areas in new locations along interstate highways in Minnesota and potentially the abandonment or reuse of existing interstate rest areas. Route D traveling along Interstate 94 could impact Mn/DOT's operations by either restricting available options for locating future safety rest areas or requiring potential relocation of transmission lines.

### **Temporary Construction Impacts**

Most of the transportation related impacts due to the Project would be from construction activities and would also be temporary in nature. Temporary access for the construction of the

new transmission lines would require a 20-foot-wide access trail constructed within the transmission line ROW or by short spur trails from the existing road network to the ROW. In some situations, private field roads or trails would be used. Permission from the property owner would be obtained prior to accessing the transmission line route. New access roads may also be constructed when no current access is available or if the existing access is inadequate.

### **3.6.7 Mitigation – Transportation (Section 7.4.3 of the DEIS)**

#### **Roadways**

Before construction begins, some potential impacts could be mitigated via coordination with the appropriate agencies and organizations regarding the placement of structures and construction methods. Final structure locations, ROW, and any disturbed areas could be determined by considering input from responsible transportation agencies (e.g. Mn/DOT, counties, townships) to minimize visual or construction impacts. Structures could be located at the maximum feasible distance from highway and trail crossings within the limits of the structure design. The construction contractor could coordinate construction activities with the appropriate road agencies to avoid interference with their roadway construction and maintenance activities. Safety Rest Areas are considered to be part of the Mn/DOT right-of-way 23 U.S.C. §109(l)(2); 23 C.F.R. §645.207 and therefore, the provisions in the Utility Accommodation Policy and Minn. Rules part 8810.3300, Subp. 4, that generally prohibit the installation of utility facilities longitudinally along Interstate 94 would apply to safety rest area locations as well. The construction contractor could also work with the appropriate agencies to minimize impacts on roadway clear zones and rest areas.

### **3.6.8 Archaeological and Historic Resources (Section 7.6 of the DEIS)**

#### **Potential Impacts (Section 7.6.1 of the DEIS)**

The Applicant Preferred Route contains no archaeological resources and 15 historic architecture resources. The historic architecture resources in this section of the route may contain multiple building(s) and/or structure(s) (known as the Anton Gogola Farmstead) listed on the NRHP. The remaining resources may be related to a bridge, a flour mill, a church, a log outbuilding, schools, and/or a music hall that have not undergone evaluation for inclusion in the NRHP.

Route E contains five previously recorded cultural resources. One of the resources is a previously recorded archaeological resource documented as a prehistoric artifact scatter. The other four resources are previously recorded historic architecture resources. Two of these historic architecture resources are represented as a township hall and a historic stage coach route. If this route is selected for use the other two historic architecture resources should be discussed as apart of the inventory survey/report.

Route A contains one previously recorded cultural resource. The resource is identified as a historic architecture resource. This one resource may be represented by a school (also mentioned in the Applicant Preferred Route section), a bridge, and/or the Lake Travers & Bois de Sioux

Flood Control and Water project. The Lake Travers & Bios de Sioux Flood Control and Water Project is considered eligible for listing on the NRHP.

Routes: B, C, D, F, G, H, and Options: 8, 9, 10, 11, and 12 were developed after submittal of this permit application. Hence, no discussion of cultural resources has occurred for these routes or route options for this permit application. The possibility exists for one route with multiple route options to be selected as the final Route. If this is the case the Applicants could follow the process proposed in the Mitigation section below to adequately consider the resources in the final selected Route.

In the case that the undergrounding options for Route D are selected; the potential for impacts to archaeological resources is significantly higher. Therefore, it is recommended that all steps of the process described in the Mitigation section should be followed along with the inclusion of a specialist (such as a geomorphologist) to fully assess resources, impacts, and mitigation requirements. The specialist would need to document the culturally viable levels, the culturally sterile levels, and discuss the potential for buried resources. Upon completion of this task, the Applicant should develop an archaeological survey in coordination with SHPO that adequately address the underground portion of route D for archaeological resources.

St. John's University has been located at the same location since 1866. The campus is nestled in a small valley and is surrounded by trees and water. The following are a list of buildings on St. John's University campus that have been registered on the National Register of Historic Places: Quadrangle, Woodworking Shop, Butcher Shop, Smoke House, Luke Hall, Saint Joseph Hall, Wimmer Hall, Guild Hall, Saint Francis House, Saint Gregory House, Simons Hall, Paint Shop, Saint Benet Hall and Archway, Auditorium and Music Hall, Power House and Stack, and Abbey Church. These buildings and many others are historically and culturally significant to St. John's University. The campus is 1.2 miles from Route C and therefore any placement of the transmission line would likely be visible from the campus. A transmission line at the beginning of the valley would potentially have an adverse effect on the current natural setting of St. John's University.

### **3.6.9 Land-Based Economies (Section 7.7 of the DEIS)**

#### **Affected Environment-Forestry**

The proposed routes and options are located primarily in grassland and cultivated land with some forested areas adjacent to farmsteads, waterways, and within the Collegeville (St. John's) Game Refuge and MnDNR managed lands. The wooded areas are located primarily on privately held lands. The wooded areas that are privately owned may be selectively cut periodically for firewood, timber, or pulpwood. However, these wooded areas are not necessarily commercial forestry operations. The exception is the 2,740 acres of St. John's University which is managed for sustainable forestry. St. John's University has had a written forest management plan since 1949. The majority of the forest industry is located within the northeastern portion of the state.

**Potential Impacts- Forestry**

The proposed routes are located primarily in grassland and cultivated land with some forested areas adjacent to farmsteads, waterways, within the Collegeville (St. John's) Game Refuge and within MnDNR managed lands. Forest resources, notably tree stands, are present along the proposed routes. Refer to Table 3.6-8 for the acreage of wooded lands within each ROW for route options between Sauk Centre and St. Cloud. Unlike cultivated land which can continue to be used in the proposed ROW, forestry operations would be removed from use.

The wooded areas are located primarily on privately held lands. Wooded areas that are privately owned may be selectively cut periodically for firewood, timber, or pulpwood. However, these wooded areas are not necessarily commercial forestry operations. ~~The majority of the forest industry is located within the northeastern portion of the state.~~ According to the MnDNR, Forestry Division, Fiscal Year 2010 Harvest Plans (MnDNR, 2009b) no townships within the proposed routes or Route Options have timber harvest plans. Impacts on forest resources will occur at locations where trees will be cleared within the right-of-way. In addition, construction of the transmission line along Routes C or D could impact the forestry management plan of St. John's University.

**Table 3.6-8 (Table 7.7-12 of the DEIS) Wooded Lands in Proposed ROW for Routes**

Route/Option	Wooded Lands in ROW (Acres)*
<b>Route Alternatives</b>	
Applicant Preferred ROW Occupancy	132
Applicant Preferred No ROW Occupancy	131
Route A	125
Route B	113
Route C	110
Route D	83
Route D Undergrounding Freeport	0.3
Route D Undergrounding Albany	0.4
Route D Undergrounding Avon	11
Route E	72
Route F	80
Route G	78
Route H	78
<b>Route Options</b>	
<b>Option 8 Area</b>	
Applicant Preferred Route	0
Option 8	0
<b>Option 9 Area</b>	
Applicant Preferred ROW Occupancy	6
Applicant Preferred No ROW Occupancy	4
Option 9	3
<b>Option 10 Area</b>	
Route A	0
Option 10	2
<b>Option 11 Area</b>	
Route E	11
Option 11	11
<b>Option 12</b>	
Route E	4
B Segments	8
<b>Amended Scope Options</b>	
Route D/E*	5
AS-4	0
AS-5	2

\*Route D/E is a combination of a 1 miles long segment of Route D that parallels Interstate 94 and a 1 mile long segment of Route E that parallels State Highway 138 in the Quarry substation area. Route D/E was developed as a comparable route to AS-5.

All above ground routes include a 150 foot ROW whereas the underground route includes a 60' ROW.

Source: NCLD, 2001

### 3.6.10 Natural Land Resources (Section 7.9 of the DEIS)

#### Affected Environment (Section 7.9.1 of the DEIS)

Natural resources evaluated in this section include State Wildlife Management Areas (WMAs), Scientific Natural Areas (SNAs), National Wildlife Refuges (NWRs), Waterfowl Production Areas (WPAs), Conservation Easements, State Game Refuges, Flora, Fauna, Rare and Unique Natural Resources and Critical Habitat.

State WMAs make up an important part of Minnesota's outdoor recreation system, protecting those lands and waters that have a high potential for wildlife production, public hunting, trapping, fishing, hiking, wildlife viewing, and other compatible recreational uses. SNAs are state managed resources. SNAs focus on the preservation of ecological diversity and provide educational and scientific research opportunities. WMAs and SNAs are located in the area between Sauk Centre and St. Cloud.

Federally owned or managed lands that protect wildlife habitat and nesting include National Wildlife Refuges (NWRs), WPAs, and USFWS conservation easements. These lands are owned and managed by the USFWS to conserve important natural resources. WPAs are federal conservation lands that provide for wildlife viewing, hiking, and other recreational uses while also conserving waterfowl and their associated habitats. Multiple WPAs and USFWS easements located throughout the area between Sauk Centre and St. Cloud but there are no NWRs present.

The 2,430 acre Collegetown Game Refuge is part of the 2,740 acres privately owned by St. John's University. This State Game Refuge was created in 1933 and is unique in that it is entirely private property owned by a single entity. It is also the largest contiguously owned block of natural land resource property in Stearns County.

Flora consists of the plants in the project region that make up vegetation communities and native vegetation. The flora discussion will also present noxious weeds as regulated under Minn. Stat. Chapter 18. Noxious weeds can overtake native vegetation and degrade habitat quality.

Fauna is defined as the wildlife throughout the Project area and consists of birds, mammals, fish, reptiles, amphibians, mussels, and insects, both resident and migratory, which use the area habitat for forage, shelter, breeding, or as a stopover during migration. Species include those found in agricultural landscapes, prairie remnants, pasture, grasslands, wetland, trout streams, and riverine habitats.

Critical Habitat is the natural environment that supports species. Designated habitat or conservation areas including managed areas such as MnDNR WMAs, USFWS WPAs, and easements, State Game Refuges and ~~unmanaged~~ other areas including MnDNR designated MCBS biodiversity significance and rare native habitats and communities were analyzed within each route. All of these areas provide habitat for native vegetation, wildlife, and rare and unique resources.

The Minnesota County Biological Survey (MCBS) identifies managed and unmanaged areas of significant biodiversity which include significant and rare native habitats and communities. The

MCBS sites of biodiversity significance are ranked and organized into three classifications; moderate, high, and outstanding. Areas with moderate biodiversity significance contain significant occurrences of rare species and/or moderately disturbed native plant communities and landscapes that have a strong potential for recovery. Areas with high biodiversity significance contain sites with high quality occurrences of the rarest plant communities and/or important functional landscapes. Areas with outstanding biodiversity significance contain the best occurrence of the rarest species; the most outstanding example of the rarest native plant communities and/or the largest, most intact functional landscapes present in Minnesota. MCBS sites are present in the area between Sauk Centre and St. Cloud but most are concentrated in the eastern area of Stearns County.

Rare and Unique Natural Resources include threatened and endangered species protected under Minn. Stat. 84.895, and under Section 7 of the federal Endangered Species Act and areas of biodiversity significance that could be associated with rare and unique species and habitats. These resources were identified using the MnDNR Natural Heritage Information System (NHIS). Threatened and endangered species are often found within high quality rare and unique habitats and features (e.g., SNAs), which could also be identified using NHIS.

### ***Fauna***

Common wildlife species found within the regional area include large and small mammals, songbirds, waterfowl, raptors, fish, reptiles, amphibians, mussels, and insects. Wildlife throughout the Project area consists of both resident and migratory species, which use the area habitat for forage, shelter, breeding, or as a stopover during migration. Species include those found in agricultural landscapes, prairie remnants, pasture, grasslands, wetland, and riverine habitats. Common mammals for these habitats include raccoon (*Procyon lotor*), skunk (*Mephitis spp.*), whitetailed deer (*Odocoileus virginianus*), coyote (*Canis latrans*), red fox (*Vulpes vulpes*), badger (*Taxidea taxus*), porcupine (*Erethizon dorsatum*), and rabbit (*Sylvilagus spp.*). Common birds include songbirds, hawks such as red-tailed hawk (*Buteo jamaicensis*) and Cooper's hawk (*Accipiter cooperii*), waterfowl, and game birds such as pheasant (*Phasianus colchinus*) and turkey (*Meleagris gallopavo*) (MnDNR, 2008). Appendix D provides lists of common mammals, birds, reptiles, and amphibians that may occur in the area.

Throughout the area between Sauk Centre and St. Cloud, areas exist where high-quality wildlife habitat occurs naturally or is being managed. Designated habitat or conservation areas including managed areas such as MnDNR WMAs; USFWS WPAs, ~~and~~ conservation easements and State Game Refuges; and managed and unmanaged other areas including MnDNR-designated MCBS biodiversity significance and rare native habitats and communities were analyzed within the proposed routes. The MnDNR and the MN Audubon Society have also identified the "Avon Hills" as an Important Bird Area which includes all of St. John's property.

Minnesota Important Bird Areas is a program developed to conserve critical bird habitats. Important Bird Areas (IBAs) are voluntary and non-regulatory, and part of an international conservation effort. The program relies on participation of private landowners, public land

managers, and community member to identify, monitor, and conserve sites, which are chosen for their biological value. Avon Hills in Stearns County is one of the largest, relatively intact blocks of kettle and moraine forested landscape remnants. The Avon Hills IBA is approximately 83,000 acres in size and covers nearly four townships. The Avon Hills IBA is recognized as a site for historic breeding populations of the Passenger Pigeon and the Swallow-tailed Kite. The IBA presently provides habitat and breeding for several northward-moving species, and according to MnDNR, records indicate possible breeding and establishment of several other bird and waterfowl species.

While agricultural land uses are an important component of wildlife resources in the area between Sauk Centre and St. Cloud, land managed to promote wildlife habitat can provide for higher species diversity and larger populations than surrounding landscapes that are intensively used for agriculture.

### **3.6.11 Potential Impacts (Section 7.9.2 of the DEIS)**

Table 3.6-9 has been revised to correct errors.

Temporary impacts to flora would take place most intensively at the structure locations. Temporary impacts are estimated at one acre per pole. Permanent vegetative changes would take place within the right-of-way. Trees and shrubs that may interfere with maintenance and the safe operation of the transmission line would not be allowed to establish within the right-of-way. Co-locating with existing corridors through wooded areas would reduce the impact on trees and habitats they support. Typically, vegetation is controlled mechanically or with herbicides on a regular maintenance schedule. Vegetation that does not interfere with the safe operation of the transmission line is allowed to reestablish within the right-of-way after construction; for the underground portions of Route D, vegetation would generally be limited to grasses and low shrubs. In addition, permanent impacts would be required at each pole location. The permanent impacts are estimated at 55 square feet per pole. Vegetation is comprised of wooded and non-wooded lands that are not agriculture. Non-wooded lands are designated as emergent herbaceous wetlands and urban/recreation grasses and wooded lands are designated as deciduous forest, evergreen forest, mixed forest, woody wetlands by the National Land Cover Data (NLCD). Refer to Table 3.6-9 below for estimated temporary and permanent impacts to vegetation between Sauk Centre and St. Cloud.

**Table 3.6-9. (Table 7.7-9 of the DEIS) Temporary and Permanent Impacts to Non-Agricultural Vegetation (Sauk Centre to St. Cloud)**

Vegetation by Route/Option	Estimated Number of Poles in Vegetated Cover	Temporary Impacts (1 Acre Per Pole) Acres	Permanent Impacts (55 SF Per Pole) SF	Permanent Impacts (55 SF Per Pole) Acres
<b>Route Alternatives</b>				
Applicant Preferred ROW Occupancy	89	89	4895 <del>4,879</del>	0.11
Applicant Preferred No ROW Occupancy	89	89	4895 <del>4,875</del>	0.11
Route A	76	76	4180 <del>4,184</del>	0.1
Route B	73	73	4180 <del>4,025</del>	0.09
Route C	74	74	4070 <del>4,090</del>	0.08
Route D	61	61	3355 <del>3,343</del>	0.06
Route E	58	58	3190 <del>3,216</del>	0.07
Route F	62	62	3410 <del>3,404</del>	0.07
Route G	55	55	3025 <del>3,005</del>	0.06
Route H	57	57	3135 <del>3,125</del>	0.07
<b>Route Options</b>				
<b>Option 8 Area</b>				
Applicant Preferred Route	1	1	55 <del>68</del>	0
Option 8	4	4	220 <del>246</del>	0
<b>Option 9 Area</b>				
Applicant Preferred ROW Occupancy	3	3	165 <del>173</del>	0
Applicant Preferred No ROW Occupancy	2	2	110 <del>121</del>	0
Option 9	6	6	330 <del>334</del>	0.01
<b>Option 10 Area</b>				
Route A	0	0	0	0
Option 10	1	1	1 <del>73</del>	0
<b>Option 11 Area</b>				
Route E	5	5	275 <del>262</del>	0
Option 11	4	4	220 <del>244</del>	0.01
<b>Option 12</b>				
Route E	5	5	275 <del>248</del>	0
B Segments	9	9	495 <del>478</del>	0.01
<b>Amended Scope Options</b>				
Route D/E *	6	6	330 <del>315</del>	0
AS-4	0	0	0	0
AS-5	1	1	55 <del>50</del>	0

\*AS-4 is a wider area with out an alignment or ROW. This area is agricultural, to traverse the area the approximate number of poles and impacts is provided.  
Source: NCLD, 2001

Route D/E is a combination of a 1 miles long segment of Route D that parallels Interstate 94 and a 1 mile long segment of Route E that parallels State Highway 138 in the Quarry substation area. Route D/E was developed as a comparable route to AS-5.

### **Flora**

None of the alternatives represent major permanent impacts to vegetation except in cases where wooded lands are permanently removed for the proposed ROW. The undergrounding options for Route D would impact more wooded lands because a 60 foot permanent linear easement would have greater impacts than poles. In forested areas, clearing for access roads and staging areas would be limited to only trees necessary to permit the passage of equipment. Once construction is complete, temporary access roads would be removed and the area would be restored to its original grade and seeded to stabilize the soil.

### **Rare Unique Natural Resources/Critical Habitat**

Rare and unique communities and habitats occur throughout the area between Sauk Centre and St. Cloud. Rare and unique communities include federal waterfowl production areas and state WMAs, SNAs, parks, trails, and MCBS sites of biodiversity significance. Data from the USFWS, MnDNR, and private organizations were reviewed to determine areas containing rare or unique communities and habitats within the proposed routes. Federal lands along the routes include WPAs, which are included within the NWR system and are managed by the USFWS, preserve wetlands and grasslands critical to waterfowl and other wildlife; and wetland, grassland, and Farmers Home Administration easements, which are managed by the USFWS to protect the prairie pothole community and wetlands on farmlands, respectively. State-owned lands along the routes include WMAs and easements managed by the Board of Water and Soil Resources (BWSR). In addition, the MnDNR, Division of Ecological Resources, MCBS data were reviewed to determine if there were areas with moderate, high, or outstanding biodiversity significance within the routes.

Minnesota Important Bird Areas is a program developed to conserve critical bird habitats. Important Bird Areas (IBAs) are voluntary and non-regulatory, and part of an international conservation effort. Potential impacts to the Avon Hills IBA were also evaluated and are discussed below.

The following sections discuss the potentially sensitive habitat areas that are present within the routes and options between Sauk Centre and St. Cloud. Refer to the tables below for impact calculations by route and ROW.

### **Applicant Preferred Route**

One USFWS easement, eight Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and six Native Plant Communities are crossed by the Applicant Preferred Route. Additionally, the Applicant Preferred Route includes a portion of the Avon Hills IBA. No WMAs, WPAs, SNAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by the Applicant Preferred Route between Sauk Centre and St. Cloud.

According to MnDNR, the St. Wendel Tamarack Bog SNA is one of the top two sites for Significant Biological Diversity in Stearns County and is a large wetland complex, which encompasses one of the largest remaining blocks of native vegetation in the county. This SNA

supports the best and largest example of Minerotrophic Tamarack Swamp in central Minnesota. The SNA is approximately one mile west of the Applicant Preferred Route and is not impacted by the alignment.

### **Route A**

Six Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance and seven Native Plant Communities are crossed by Route A. No WMAs, WPAs, SNAs, USFWS Easements, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route A between Sauk Centre and St. Cloud. Additionally, Route A includes a portion of the Avon Hills IBA. Similar to the Preferred Route the St. Wendel Tamarack Bog SNA is approximately one mile west of the Applicant Preferred Route and is not impacted by the alignment.

### **Route B**

One USFWS easement, one SNA, ten Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and nine Native Plant Communities are crossed by Route B. Additionally, Route B includes a portion of the Avon Hills IBA. No WMAs, WPAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route B.

### **Route C**

One USFWS easement, nine Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, one State Game Refuge, and three Native Plant Communities are crossed by Route C. Additionally, Route C includes a portion of the Avon Hills IBA. No WMAs, WPAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route C.

### **Route D**

One USFWS easement, ten Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, one State Game Refuge, and three Native Plant Communities are crossed by Route D. Additionally, Route D includes a portion of the Avon Hills IBA. No WMAs, WPAs, SNAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route B.

### **Route D Undergrounding Options**

The undergrounding options for Route D do not impact any additional resources except for the undergrounding option between Avon and St. Joseph which impacts one Native Plant Communities, ~~and~~ one MCBS site of moderate significance, ~~and~~ one State Game Refuge. Additionally, the undergrounding option for Route D includes a portion of the Avon Hills IBA. Impacts from undergrounding options in comparison to above ground options are presented in the discussion following the tables below.

### **Route E**

One USFWS easement, one WMA, eleven Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and five Native Plant Communities are crossed by Route E. Additionally, Route E includes a portion of the Avon Hills IBA. No WPAs, SNAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route E.

**Route F**

One USFWS easement, two SNAs, fifteen Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and eight Native Plant Communities are crossed by Route F.

Additionally, Route F includes a portion of the Avon Hills IBA. No WMAs, WPAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route F.

**Route G**

One USFWS easement, eleven Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and six Native Plant Communities are crossed by Route G.

Additionally, Route G includes a portion of the Avon Hills IBA. No WMAs WPAs, SNAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route G.

**Route H**

One USFWS easement, one WMA, eleven Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance, and six Native Plant Communities are crossed by Route H.

Additionally, Route H includes a portion of the Avon Hills IBA. No WPAs, SNAs, MCBS Railroad Prairies, or BWSR RIM Easements are crossed by Route H.

**Option 8**

Option 8 does not impact any sensitive resources described in this section.

**Option 9**

Option 9 impacts one USFWS easement that is not impacted by the Applicant Preferred ROW Occupancy and No ROW Occupancy alignments in this location.

**Option 10**

Option 10 does not impact any sensitive resources described in this section.

**Option 11**

Option 11 includes a portion of the Avon Hills IBA. However, Option 11 does not impact any other sensitive resources described in this section, whereas the alternate Route E impacts two Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance and four Native Plant Communities in the same location.

**Option 12**

Option 12 impacts two Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance when traveling on the B Segments and one Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance when traveling on the alternate Route E. Additionally, Option 12 includes a portion of the Avon Hills IBA

**Amended Scope Option 4**

AS4 does not impact any sensitive resources described in this section.

**Amended Scope Option 5**

AS5 11 includes a portion of the Avon Hills IBA. However, AS5 does not impact any other sensitive resources described in this section.

Table 3.6-10 below identifies acreage of potential impacts to sensitive management areas and conservation easements within proposed routes and ROW for each route and route option. There are no additional resources located in AS4 or AS5 and therefore they are not included in the table.

**Table 3.6-10. (Table 7.9-4 in the DEIS) Route Impact Evaluation**

Habitat Classification	Applicant Preferred Route ROW Occupancy		Applicant Preferred Route No ROW Occupancy		Route A		Route B		Route C	
	Route (Acres)	ROW (Acres)	Route (Acres)	ROW (Acres)	Route (Acres)	ROW (Acres)	Route (Acres)	ROW (Acres)	Route (Acres)	ROW (Acres)
WPAs	0	0	0	0	0	0	0	0	0	0
WMAs	0	0	0	0	0	0	0	0	0	0
USFWS Easements										
Wetlands	0	0	0	0	0	0	0	0	0	0
Grasslands	0	0	0	0	0	0	0	0	0	0
Farmers Home Administration	0	0	0	0	0	0	0	0	0	0
Other	80.7	0	80.7	0	0	0	29.4	6.5	80.7	0
MCBS, Sites of Biodiversity Significance										
Moderate	0	0	0	0	0.3	0	33	1	0	0
High	356	20	356	20	356	20	0	0	0	0
Outstanding	0	0	0	0	0	0	57	3	57	0
MCBS, Native Plant Communities	92	7	92	7	92	7	46	2	29	0
MCBS, Railroad Right-of-Way Prairies										
Fair	0	0	0	0	0	0	0	0	0	0
Good	0	0	0	0	0	0	0	0	0	0
Very Good	0	0	0	0	0	0	0	0	0	0
SNAs	0	0	0	0	0	0	6	0.02	0	0
Minnesota Land Trust Conservation Easements	0	0	0	0	1	0	30	6.5	0	0
BWSR, Re-Invest in Minnesota (RIM) Easements	0	0	0	0	0	0	0	0	0	0
Calcareous Ferns										
Outstanding	0	0	0	0	0	0	0	0	0	0
Avon Hills IBA	5,157	280	5,157	280	4,194	126	1,431	216	1,962	281
State Game Refuge	0	0	0	0	0	0	0	0	199-175	28

**Table 3.6-11. (Table 7.9-5 in the DEIS) Route Impact Evaluation (Sauk Centre to St. Cloud) Continued**

Habitat Classification	Route D		Route D Undergrounding		Route E		Route F		Route G		Route H	
	Route	ROW	Route	ROW	Route	Route	Route	ROW	Route	ROW	Route	ROW
WPAs	0	0	0	0	0	0	0	0	0	0	0	0
WMAs	0	0	0	0	17	0.04	0	0	0	0	28	1
USFWS Easements												
Wetlands	0	0	0	0	0	0	0	0	0	0	0	0
Grasslands	0	0	0	0	0	0	0	0	0	0	0	0
Farmers Home Administration	0	0	0	0	0	0	0	0	0	0	0	0
Other	80.7	0	0	0	80.7	0	80.7	0	80.7	0	80.7	0
MCBS, Sites of Biodiversity Significance												
Moderate	15	3	15	2.6	42	6	55	10	60	6	60	6
High	1	0.02	1	0	20	2	42	3	51	8	51	8
Outstanding	0	0	0	0	0	0	0	0	0	0	0	0
MCBS, Native Plant Communities	15	3	15	1.2	37	3	9	1	56	7	56	7
MCBS, Railroad Right-of-Way Prairies												
Fair	0	0	0	0	0	0	0	0	0	0	0	0
Good	0	0	0	0	0	0	0	0	0	0	0	0
Very Good	0	0	0	0	0	0	0	0	0	0	0	0
SNAs	0	0	0	0	0	0	13	0.4	0	0	0	0
Minnesota Land Trust Conservation Easements	0	0	0	0	0	0	0	0	0	0	0	0
BWSR, Re-Invest in Minnesota (RIM) Easements	0	0	0	0	0	0	0	0	0	0	0	0
Calcareous Ferns												
Outstanding	0	0	0	0	0	0	0	0	0	0	0	0
<u>Avon Hills IBA</u>	<u>1,889</u>	<u>178</u>	<u>1,889</u>	<u>70</u>	<u>1,301</u>	<u>176</u>	<u>89</u>	<u>12</u>	<u>1,256</u>	<u>168</u>	<u>1,256</u>	<u>168</u>
<u>State Game Refuge</u>	<u>45</u>	<u>6</u>	<u>45</u>	<u>2.4</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**Table 3.6-12. (Table 7.9-6 in the DEIS) Route Option Impact Evaluation**

Habitat Classification	Option 8 Area				Option 9 Area				Option 10 Area			
	Applicant Preferred Route		Option 8		Applicant Preferred Route		Option 9		Route A		Option 10	
	Route	ROW	Route	ROW	Route	ROW	Route	ROW	Route	ROW	Route	ROW
WPAs	0	0	0	0	0	0	0	0	0	0	0	0
WMAs	0	0	0	0	0	0	0	0	0	0	0	0
USFWS Easements												
Wetlands	0	0	0	0	0	0	0	0	0	0	0	0
Grasslands	0	0	0	0	0	0	0	0	0	0	0	0
Farmers Home Administration	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	37.2	6.6	0	0	0.2	0
MCBS, Sites of Biodiversity Significance												
Moderate	0	0	0	0	0	0	0	0	0	0	0	0
High	0	0	0	0	0	0	0	0	0	0	0	0
Outstanding	0	0	0	0	0	0	0	0	0	0	0	0
MCBS, Native Plant Communities	0	0	0	0	0	0	0	0	0	0	0	0
MCBS, Railroad Right-of-Way Prairies												
Fair	-	0	-	0	-	0	-	0	-	0	-	0
Good	-	0	-	0	-	0	-	0	-	0	-	0
Very Good	-	0	-	0	-	0	-	0	-	0	-	0
SNAs	0	0	0	0	0	0	0	0	0	0	0	0
Minnesota Land Trust Conservation Easements	0	0	0	0	0	0	0	0	0	0	0	0
BWSR, Re-Invest in Minnesota (RIM) Easements	0	0	0	0	0	0	0	0	0	0	0	0
Calcareous Ferns												
Outstanding	0	0	0	0	0	0	0	0	0	0	0	0
<u>Avon Hills IBA</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>State Game Refuge</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**Table 3.6-13. (Table 7.9-7 in the DEIS) Route Option Impact Evaluation (Continued)**

Habitat Classification	Option 11 Area				Option 12 Area			
	Route E		Option 11		Route E		Route B4 & B5	
	Route	ROW	Route	ROW	Route	ROW	Route	ROW
WPAs	-	0	-	0	-	0	-	0
WMAs	-	0	-	0	-	0	-	0
USFWS Easements								
Wetlands	0	0	0	0	0	0	0	0
Grasslands	0	0	0	0	0	0	0	0
Farmers Home Administration	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
MCBS, Sites of Biodiversity Significance								
Moderate	8	0.3	0	0	0	0	0	0
High	20	2	0	0	0	0	0	0
Outstanding	0	0	0	0	0	0	0	0
MCBS, Native Plant Communities	0	0	0	0	0	0	0	0
MCBS, Railroad Right-of-Way Prairies								
Fair	-	0	-	0	-	0	-	0
Good	-	0	-	0	-	0	-	0
Very Good	-	0	-	0	-	0	-	0
SNAs	0	0	0	0	0	0	0	0
Minnesota Land Trust Conservation Easements	0	0	0	0	0	0	0	0
BWSR, Re-Invest in Minnesota (RIM) Easements	0	0	0	0	0	0	0	0
Calcareous Ferns								
Outstanding	0	0	0	0	0	0	0	0
<u>Avon Hills IBA</u>	<u>563</u>	<u>64</u>	<u>303</u>	<u>37</u>	<u>17</u>	<u>0</u>	<u>17</u>	<u>0</u>
<u>State Game Refuge</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**Table 3.6-14. Amended Scope Option Impact Evaluation**

Habitat Classification	AS 5			
	AS 5		AS 5B	
	Route	ROW	Route	ROW
WPAs	-	0	-	0
WMAs	-	0	-	0
USFWS Easements				
Wetlands	0	0	0	0
Grasslands	0	0	0	0
Farmers Home Administration	0	0	0	0
Other	0	0	0	0
MCBS, Sites of Biodiversity Significance				
Moderate	0	0	0	0
High	0	0	0	0
Outstanding	0	0	0	0
MCBS, Native Plant Communities	0	0	0	0
MCBS, Railroad Right-of-Way Prairies				
Fair	-	0	-	0
Good	-	0	-	0
Very Good	-	0	-	0
SNAs	0	0	0	0
Minnesota Land Trust Conservation Easements	0	0	0	0
BWSR, Re-Invest in Minnesota (RIM) Easements	0	0	0	0
Calcareous Ferns				
Outstanding	0	0	0	0
<u>Avon Hills IBA</u>	<u>211</u>	<u>40</u>	<u>111</u>	<u>0</u>
<u>State Game Refuge</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

The Applicant Preferred ROW Occupancy and No ROW Occupancy alignments include 20 acres of an MCBS site designated high and seven acres of an MCBS native plant community within their ROWs but they do not impact any additional sensitive management areas or conservation easements. The Route A impacts are identical to the Applicant Preferred Route except for a lesser impact to the Avon Hills IBA. The Applicant Preferred Route has the second greatest impact to the Avon Hills IBA next to Route C. Route A would have more than 50 percent less impact to the IBA than the Preferred Route.

Route B impacts includes more sensitive resources and easements within its ROW than the Applicant Preferred Routes and Route A. However, it has fewer impacts on the Avon Hills IBA than the Applicant Preferred Route. Route C does not include any impacts to management areas

or conservation easements within its ROW, except for the Collegeville (St. John's) State Game Refuge where it impacts a portion of an MCBS site rated outstanding. Similar to the Applicant Preferred Routes and Route A, Route D impacts MCBS biodiversity sites and native plant communities but includes less acreage within its ROW. Only Routes C and D have the potential to impact the state game refuge. While the Route C ROW would include the greatest acreage of the refuge, the Route D ROW would contain approximately 6 acres, and these impacts would be reduced to less than 3 acres if the undergrounding option was implemented.

Route E includes a small portion of a WMA within its ROW in addition to MCBS biodiversity sites and native plant communities however its impact to the MCBS resources are less than the Applicant Preferred Route and Route A. Route E impacts approximately the same area of the Avon Hills IBA as Routes D, G, and H but considerably less area than the Applicant Preferred Route.

Route F includes a small portion of an SNA within its ROW in addition to MCBS biodiversity sites and native plant communities however its impact to the MCBS resources are less than the Applicant Preferred Route and Route A. Overall, Route F has the greatest impacts of any route on SNAs. It is important to note that impacts to SNAs are not allowed under state regulations; therefore if Route F were to be selected, a modified ROW would be required that avoids this SNA. Route F would have the fewest impacts to the Avon Hills IBA.

Similar to the Applicant Preferred Routes and Route A, Route G impacts MCBS biodiversity sites and native plant communities but includes less acreage within its ROW. Route H has the same impacts as Route G with an additional impact of one acre to a WMA. This represents the greatest impact to a WMA between Sauk Centre and St. Cloud. Route G also has considerable impacts (approximately 170 acres) to the Avon Hills IBA.

Generally, the proposed Route Options do not impact any additional resources except in three cases. Option 9 includes USFWS easements within its proposed ROW whereas the Applicant Preferred Route does not. Option 11 impacts fewer MCBS sites within its proposed ROW than its alternate Route E but is the only option to have impacts to the Avon Hills IBA.

The Amended Scope Options do not represent any additional impacts to these resources other than the Avon Hills IBA. The Option AS 5 would include approximately 40 acres of the IBA within its ROW.

The DNR and its partners developed Minnesota's State Wildlife Action Plan (SWAP), called "Tomorrow's Habitat for the Wild and Rare" as a tool to guide wildlife conservation as population growth and associated demands place increasing pressure on the state's natural resources. SWAP provides conservation actions and priorities for Species of Greatest Conservation Need (SGCN) and their key habitats relative to the ecological subsection. SGCN are defined as species whose populations are rare, declining, or vulnerable to decline and are below levels desirable to ensure long-term health and stability (including threatened and endangered species). Much of the species documentation within Minnesota's SWAP is provided

by the Minnesota County Biological Survey (MCBS). Key habitats are specific to an ecological subsection and are defined as the habitats most important to the greatest SGCN.

Table 3.6-15 identifies the SGCN that are present within one mile and 1000 feet of the proposed routes, route options, and amended scoping options. There are no SGCN located within the 150-foot proposed ROW for any of the alignments. Route C, G, and H are all within 1,000 feet of a SGCN and Route F is within 1,000 feet of two SGCN. Overall Route Options D and H have the greatest number of SGCN within one mile of the proposed route, followed by Routes, F, C, and the Applicant Preferred Route. Route B is located within proximity to the fewest SGCN followed by Route A and Route E.

**Table 3.6-15. Species of Greatest Conservation Need Sauk Centre and St. Cloud**

Common Name	Scientific Name	Route or Option (Number of Occurrences within 1 mile Route)	Number of Occurrences within 1000' Route	Key Habitat Type for SGCN*
<b>Birds</b>				
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Applicant Preferred Route (1), Route C (1), Route D (1), Route E (1), Route F (4), Route G (1), Route H (1), Route Option 9 Preferred Route (1), Option 9 (1)	0	Forest- Upland Deciduous (Aspen)
Cerulean Warbler	<i>Dendroica cerulea</i>	Route C (3), Route D (1), Route E (1), Route F (2), Route G (2), Route H (2)	Route G (1), Route H (1)	Forest – Upland Deciduous (Hardwood)
Marbled Godwit	<i>Limosa fedoa</i>	Route E (1), Route G (2), Route H (1)	0	Prairie
Red-shouldered Hawk	<i>Buteo lineatus</i>	Applicant Preferred Route (1), Route A (2), Route B (1), Route C (2), Route D (4), Route F (1)	0	Forest – Upland Deciduous (Aspen)
<b>Reptiles</b>				
Blanding's Turtle	<i>Emydoidea blandingii</i>	Applicant Preferred Route (2), Route A (1), Route C (1), Route D (1), Route F (1)	Route F (1)	Prairie
<b>Fishes</b>				
Least darter	<i>Etheostoma microperca</i>	Route D (4)	0	Lake - Deep
Pugnose shiner	<i>Notropis anogenus</i>	Applicant Preferred Route (1), Route C (1), Route D (4)	Route C (1)	Lake - Deep
<b>Insects</b>				
A Jumping Spider	<i>Paradamoetas fontana</i>	Route F (1)	0	Prairie
<b>Invertebrates</b>				
Black sandshell	<i>Ligumia recta</i>	Applicant Preferred Route (2), Route A (2), Route B (1), Route C (1), Route D (1), Route E (2), Route F (5), Route G (4), Route H (7), Option 12 B (1), Option 12 E (1), Amended Scoping Option 5 (1), Amended Scoping Option B (1)	Route F (1)	River – Headwater to large
Creek heelsplitter	<i>Lasmigona compressa</i>	Applicant Preferred Route (2), Route A (1), Route B (2), Route C (1), Route D (1), Route E (1), Route F (1), Route G (1), Route H (2), Option 12 B (1), Option 12 E (1), Amended Scoping Option 5 (1), Amended Scoping Option B (1)	0	River – Headwater to large

\*Source: *Tomorrow's Habitat for the Wild and Rare: an Action Plan for Minnesota Wildlife*. April 4, 2006.

Status: END = Endangered, THR = Threatened, SC = Special Concern, NL = Not Listed, NA = No Legal Status.

Rank: S1 = critically imperiled, S2 = imperiled, S3 = vulnerable to extirpation or extinction, S4 = apparently secure, S5 = demonstrably widespread, abundant, and secure. Combined codes (e.g., "S3S4") indicate that the numerical ranking falls between the two ranks. SNR = present in the state or province, but no SRank is available. In Minnesota, SRank reflects Current Status. Thus, E = S1, T = S2, and SC = S3.

### 3.6.12 Mitigation(Section 7.9.3 of the DEIS)

#### **Rare Unique Natural Resources/Critical Habitat**

MCSB areas of moderate, high, and outstanding biodiversity significance, and MnDNR-listed natural communities are areas known to be capable of supporting rare and unique species. The number of structures placed in these areas could either be avoided or minimized by maximizing the span across them. Where structure placement cannot be avoided in these sensitive communities, special status species associated with these habitats could be affected. This effect on special status species is especially true in forested habitats that will be eliminated as part of the ROW construction and maintenance. Applicants could also span any habitats where unique plant communities have been recorded or are likely to occur, wherever possible. If construction within these resources cannot be avoided, surveys could be conducted and the appropriate agencies could be consulted to assure impacts to listed species are avoided or minimized.

#### **Protected Species**

The special status species associated with wetlands, stream banks, and rivers could be impacted by placement of structures within these habitats, or by increased erosion and sedimentation that could occur if appropriate mitigative measures or Best Management Practices are not employed. Therefore, the Applicant could span rivers, streams, and wetlands throughout the project area to the extent practical, implement the appropriate mitigation measures or practices such as using construction mats to avoid soil compaction, and maintain sound water and soil conservation practices during construction of the project to protect topsoil and adjacent water resources, minimizing soil erosion and sedimentation. However, if it is not feasible to span, surveys could be conducted to determine the presence of state-listed species or suitability of habitat for such species, and coordination could occur with the appropriate agencies to avoid and minimize any associated impacts. Minnesota endangered species law (Minnesota Statutes Section 84.0895) and associated rules (Minnesota Rules Part 6212.1800 to 6212.2300 and 6134) prohibit the taking of endangered or threatened species without a permit. Surveys may be required to determine if takings may occur at seasonally appropriate times. Further, impacts could be mitigated by construction phasing during non-nesting and breeding season to avoid impacts to breeding species. Additionally, Appendix E includes a Fact Sheet on the Blanding's turtle with recommendations for avoiding and/or minimizing impacts to this species.

### 3.6.13 Permits and Approvals (Section 6.0 of the DEIS)

Counties noted that the permits and approvals for Wetland Conservation Act (WCA) would come from the Local Government Unit (LGU) not the Board of Water Soil Resources (BWSR). This change is reflected in the table below.

**Table 3.6-16. (Table 8-1 in the DEIS) Potential Permits and Approvals**

Permit	Jurisdiction
<b>Local Approvals</b>	
Road Crossing/ROW Permits	County, Township, City
Lands Permits	County, Township, City
Building Permits	County, Township, City
Over width Loads Permits	County, Township, City
Driveway/Access Permits	County, Township, City
<b>Minnesota State Approvals</b>	
Certificate of Need	Minnesota PUC
Route Permit	Minnesota PUC
Cultural and Historical Resources Review	Minnesota SHPO
Endangered Species Consultation	Minnesota DNR - Ecological Services
License to Cross Public Waters	Minnesota DNR - Lands and Minerals
<u>License to Cross Public Lands</u>	<u>Minnesota DNR - Lands and Minerals</u>
Utility Permit	Mn/DOT
NPDES Permit	MPCA
<b>Federal Approvals</b>	
Section 10 Permit	USACE
Section 404 Permit	USACE
Permit to Cross Federal Aid Highway	FHWA
Notice of Proposed Construction (7460-1)	FAA
Notice of Actual Construction or Alteration	FAA
Farmland Protection Policy Act/Farmland Conversion Impact Rating	USDA/NRCS
Spill Prevention, Control and Countermeasure (SPCC) Plan	EPA
Compatibility Analysis of Disturbed Easements/Lands	USFWS

**Appendix A Public and Agency Comments**



**Appendix B Applicants Letter**



**Appendix C Revised Detailed Route Maps**



**Appendix D Fact Sheet on Blanding's Turtle**

