GRE 115 kV Transmission Line Project
June 1, 2010

Mr. Scott Ek
State Permit Manager
Energy Facility Permitting
Office of Energy Security
Email: scott.ek@state.mn.us

Dear Mr. Ek:

Please include the following in the record of public comments on the GRE Transmission Line Project.

On Alternate Routes:

There is still a great need for further and detailed study of alternate routes. I believe that not all of the suitable alternatives have been studied in the short time allowed for this activity. I understand that MN has indicated a preference for following existing right-of-way when constructing power lines. However, this is not a hard and fast rule. I noted on my travel to my permanent residence in Faribault, MN after the Task Force Public Hearing that just south of Park Rapids there are transmission lines that travel across country and through lowland and swamp areas. The possibility for the same type of routing should be considered here as a means to minimize the impact on residents, valuable shoreline property and the environment. The ease of construction and lowest cost to the Power Company should not be the governing factor in deciding the route. The value of esthetic factors and the cost to impacted residents and landowners can and should considered in determining the overall cost/benefit of the project.

Alternate Route Proposals:

Just south (about ¼ mile) of Co. Route 18, Fortune Drive goes west starting at Co Route 1. Fortune Drive goes through mainly second growth oak. There are driveways off the road to a few homes, but the right-of-way could be chosen to avoid major impact to those homes. Fortune Drive appears to dead end into undeveloped land. Going further west through the undeveloped land allows crossing the river between Potato and Fish Hook Lakes south of the bridge on Co. Route 18. A further improvement is to cross farmland starting from Co Route 4 to join directly to Fortune Drive. It then becomes possible to turn the transmission line north to match up with either of the northward extensions prior to connecting to the western section along 280th street. This avoids putting any transmission line along Co Route 18 and preserves the scenic beauty along that

route. It avoids impacting lakeshore properties, the three homes close to the highway and Boulder Beach Resort.

The Task Force has proposed a Northern Route. Evidence given at the Public Hearing indicated that the direct route west from Emmaville passed through major portions of swamp and may be impractical. However, it must be possible with some minimum of study to determine if these swamp areas could be avoided by choosing a westerly route from Emmaville that a used the higher elevations and avoided the swamps. Therefore, this route can be given further study. A study of the plat book showed only five property owners along the east west portion of that route. The DNR and Hubbard County owned major portions. The route north from the Mantrap substation is Co Route 4 has an existing service line. Therefore, the impact on property owners along that part of the route will be less than the taking of new right-of-way along Co. Route 18.

It is very likely that there are other routes that offer reduced impact on current residents.

It appears obvious that the Power Company only looked at routes where the cost to them would be a minimum and the cost to residents would be a maximum. I believe that routing should be more thoroughly studied using a concept of total cost – a cost benefit analysis that includes the cost to residents and tot he environment.

Need Based Analysis:

There appear to be serious questions about the need for the project. We have heard reported of off-the-record comments from power company employees that the true time-need for a transmission line may be 30 – 40 years and that the substation location is not optimum or preferred by GRE. These comments, although not official power company policy, should be given some credibility and at least offer evidence that the power company may have ulterior motives in progressing the project at this time.

Thus, there is a good argument that a need study should be initiated – even though it is not required by statute. I believe that such a study could be ordered by the state regulatory agencies even though not required as a matter of course by statute.

Itasca Mantrap power has agreed to have a public meeting to justify their proposals and need. The approvals for the project should not be granted until this occurs. Also, the record of this meeting and the public comment it generates should also become part of the record and decision process for this project.

There are many questions to be addressed. Why was installation of a substation started without any means of supplying power? What is the basis for claimed

power need for the area? Was the recent economic downturn factored into the analysis? What are the present long-term prospects for development for the projected area? Are there alternative means to supplying power to the substation or are there alternative means to supplying the projected growth needs? What is the actual growth in power usage for the area? We have heard reports that the growth is actually negative for the recent past. Will this negative trend reverse or continue?

Growth for growth's sake does not make good economic sense and if unjustified leads to higher supply cost. There is no justification for construction of facilities with 30-year time frame based need. Even a 5 or 10-year time frame can be questioned. If a project can be completed in one year, then timing only needs to be one to two years ahead of the need. Waiting also gives a chance to develop more data regarding growth trends and true need.

There are alternative ways to meet need. Conservation is one means. People can use the new energy efficient lighting. Electric heating of all kinds can be based on off-peak loading – this makes the entire system more efficient.

Summary:

In summary, there are serious questions about need and route choice that deserve further study before approval of this project is given. A further study of need and route choice will serve to benefit both sides (Power Company and impacted residents). I am urging delay of the project until these issues can be further clarified and the project can be better justified.

Respectfully,

Larry O. Jones
South Potato Lake Shore Owner
15482 Co. Road 18

3033 Circle Bluff Trail
Faribault, MN 55021

Date 5/24/2010

Office of Energy Security
Scott Ek, State Permit Manager
85 7th Place East, Suite 500
St. Paul, MN 55101 2198

RE: Docket TL-10-86

Dear Mr. Ek:

I owned 30 years Land on both sides along 18. I do Not want it on the south Lake Side! Of course I would Rather Not have it at all. →

I am in favor of locating Great River Energy's 115 kV transmission line along the northern alternative route located west of Emmaville from CSAH 4 to Highway 71. If the substation were to also be located at this vicinity, it would be a preferred site for future growth needs.

This route is better than CSAH 18 or CSAH 40 because it is primarily county and state land, affecting as few private properties as possible while preserving the aesthetics of our lake sensitive area, wetlands and tourism industry.

Thank you.

Warren Meyer
Name

6980 Lora Lee Lane
Address

Eden Prairie, MN 55346
City, State

We want to build & move there — if that 100' cut happens into our Lake property we will have No Lake side Left! No privacy. No Resale value!! We have a difficult Lot to build on anyway Now it will be even worse. The County may not let us with this easement!

Scott Ek
Office of Energy Security, Energy Facility Permitting
85 7th Place East, Suite 500 | St. Paul, MN |55115
Email: scott.ek@state.mn.us |Facsimile: 651-297-7891

In response to Great River Energy's (GRE) Potato Lake 115kv Transmission Line and Substation Project
PUC No. ET2/TL-10-86

Project Purpose (To me this is the number one problem).

The final destination of the project is known to be Pine Point, which in its finality becomes a much longer than 10 mile high voltage transmission line. The current project proposal states that the line will not be used at 115k for four or five years. This leads me and many others to believe that this is when GRE has planned completion of the build to Pine Point to junction with existing lines there. I believe the purpose, planning and intent of this project has been mischaracterized and designed to skirt the laws that requires high voltage transmission lines over 10 miles to have a comprehensive environmental impact study and additional requirements required to obtain a certificate of need. The current plans also allow for a divide and conquer scenario. Approaching this build as they are, GRE does not have to confront as many residents, who in turn could be much more able to produce a stronger opposition than they can divided. I submit that GRE's current approach has been taken to avoid the more thorough study, including the afore mentioned comprehensive environmental impact study, and a much stronger opposition. Shouldn't the residents along the route to Pine Point when finalized be informed now? I have seen those who may be in the next phase told there is absolutely no such plans. This resembles how we were informed at the last public meeting this plan has been around since 2002 but none of use in the current affected area has ever been made aware of such until now.
It is my opinion that by GRE pursuing in this fashion, it creates a position that misrepresents the total impact to residents, the environment, and protected wildlife to the overseeing government officials. This seems contrary to reasons these laws were created, and thus should be considered as an attempt to circumvent these laws.

Aesthetics, recreation, and unique environment

The current project as GRE has proposed will destroy one a most pristine and visually appealing areas the Park Rapids area is famous for. Park Rapids survives primarily as a tourist town prized in large part because of this kind of scenery and unique character. The Logging Camp is one addition to this character, along with generations of people enjoying the yearly fishing and gorgeous scenery while frolicking in the waters at the damn/bridge not far down the road from the Logging Camp. The farther people will have to leave Park Rapids to enjoy this, the less likely Park Rapids will enjoy the fame of its beauty and remain the tourist hotspot it is. Golden and bald eagles nest just a naked eye shot south of 141st avenue in a wetland area. I have witnessed at least 5 years of hatchlings. When I was young I rarely caught glimpse of any form of eagles anywhere near Park Rapids, now I see them flying over my home daily. I worry for these birds as I have seen a new power line in Bemidji kill off an established nesting area despite all the precautions that were supposed to protect these birds. Some died from ordinary accidental contact electrocutions at poles. And in one case, a nest was built right on a pole, even resulting in a successful egg hatch, only for the entire nest to catch fire one day from something creating an arc to the power lines before the young birds could fly. As far as I know there are no longer eagles nesting in that area. I have not lived or have frequented the area in many years now but from what I see in rare passing there are no signs of such.

Damages/Proximity to residents, and future development.

As proposed GRE's power line will intrude directly in front of or in some cases possibly right OVER houses, and decimate the privacy and beauty which is exactly why most of us live here. This could completely stop planned additions and development of property for many involved. I have heard of at least two of these cases, where the entire purpose to purchase the affected land was to develop. My primary concern and example is 141st avenue as I live on this road. One of my properties on this road will no longer be developable as planned *if at all*. If the power lines are to follow on either side of this road it will be perilously near or over the houses on one side or the other, my mother's house could be one of these depending on the side of the road the lines follow.

At one of the first public meetings I introduced an alternative route of almost exact distance to a GRE representative that will bypass at least 13 housing units on 141st and part of CR18. This alternative route is the one included with GRE's proposal. Although the alternative route does involve small low lying areas and possibly more wood-land, much of this area has been routinely logged or is currently a small road or trail. Choosing this alternative route represents a dramatically lessened impact to local housing and the adverse affects. This route should not create much challenge for line maintenance once completed. An additional benefit could be that almost the entire neighborhood's residents are avid deer watchers and environmentally responsible hunters. Opening a path such as this may help encourage deer travel along this corridor and it may be possible the deer population could benefit from this. The alternative route will also help distance the nesting areas I mentioned previously, however I am not an expert on the nature and habits of eagles and cannot say how far the lines would need to be to prevent interaction. I will venture to guess that it should help. It may also be possible (if the Safratowiches agree) to lessen the visual impact more by following the road west from the alternative paths north eastern corner deeper into their north field which makes it farther from the roadway leading to Northern Pine Lodge allowing a tree line to help cover the view, then crossing the Northern Pine road north across a current opening *before* intersecting with 141stav. From there continuing west crossing the road that continues from 141st ave to what used to be referred to as "Shipwreck", into Potlatche's land and on. Unfortunately I have no particular ideas from that point or beyond that may help minimize impact or avoid the particularly deep and marshy swamplands that exist past this point. Overall I strongly believe and wish to convey that this alternative route should be a much more cost effective and much less damaging route for GRE and the residents it will bypass. (image at the end)

Another idea for routing

To bypass more residents it could be possible to cross existing clear fields that run from CR4 to CR18. This will eliminate the affects to the people it excludes and may be almost non-intrusive. With this routing primarily crossing grazing land, there are few negatives I can think of, with exception of periodic maintenance to the lines. Nobody would live extremely near these lines, and a much lessened amount of trees and privacy would be affected. This may even reduce the total distance of this transmission line. Considering the value held for sanctity, privacy and security are in fact the very reason we live where we do despite the lack of the conveniences of larger cities. Any way to minimize damages to as many residents as possible should be considered, even if it's not a "normal" standard.
I have attached an image at the end of this letter to better illustrate this possible route.

Yet another alternative route

I have been made aware at the last public meeting to yet another alternative route has been proposed by others of the Potato Lake Association. It seems this proposed route would bypass the entire existing proposed route, sticking to already widely cleared area following CR4 towards Emmaville, and then through a large area of state owned land. It was said this would have less residential impacted, and of these, most will have a lesser impact because the road has a large existing clearing. I will leave this to those others to promote as I do not have a great enough understanding of that area to make any informed additions. However I strongly hope any alternatives to bypass this scenic area as currently proposed is carefully studied and considered.

EMF/Safety

As many times as it's been researched there are still many conflicting results on how the corona of high voltage power lines affects those living near them. I have been informed recently my mother, Judy Miller, has concluded she will not risk these possibilities and has started to consider a move somewhere away from these lines if they are built on her (our) side of the road, and possibly even if they are built on the opposite side and not built on an alternative route. These lines will be extremely close to her house, and she will lose the privacy of the current trees. In fact her plans will be to leave Park Rapids entirely if this happens to her home. I have recently also heard similar comments from others living in the affected area. Not only will these homes be abandoned, they will be *very* hard to sell at a reasonable value for the seller. This transmission line could add to current recession created losses of tourism, as the area's attractions, beauty, and uses diminish. Along with the current reduction in property values, this could create an additional reduction of part time vacationers seeking vacation homes, adding to the reduction in amount of taxable value, equating to compounded lost revenue for the county/city.

In conclusion

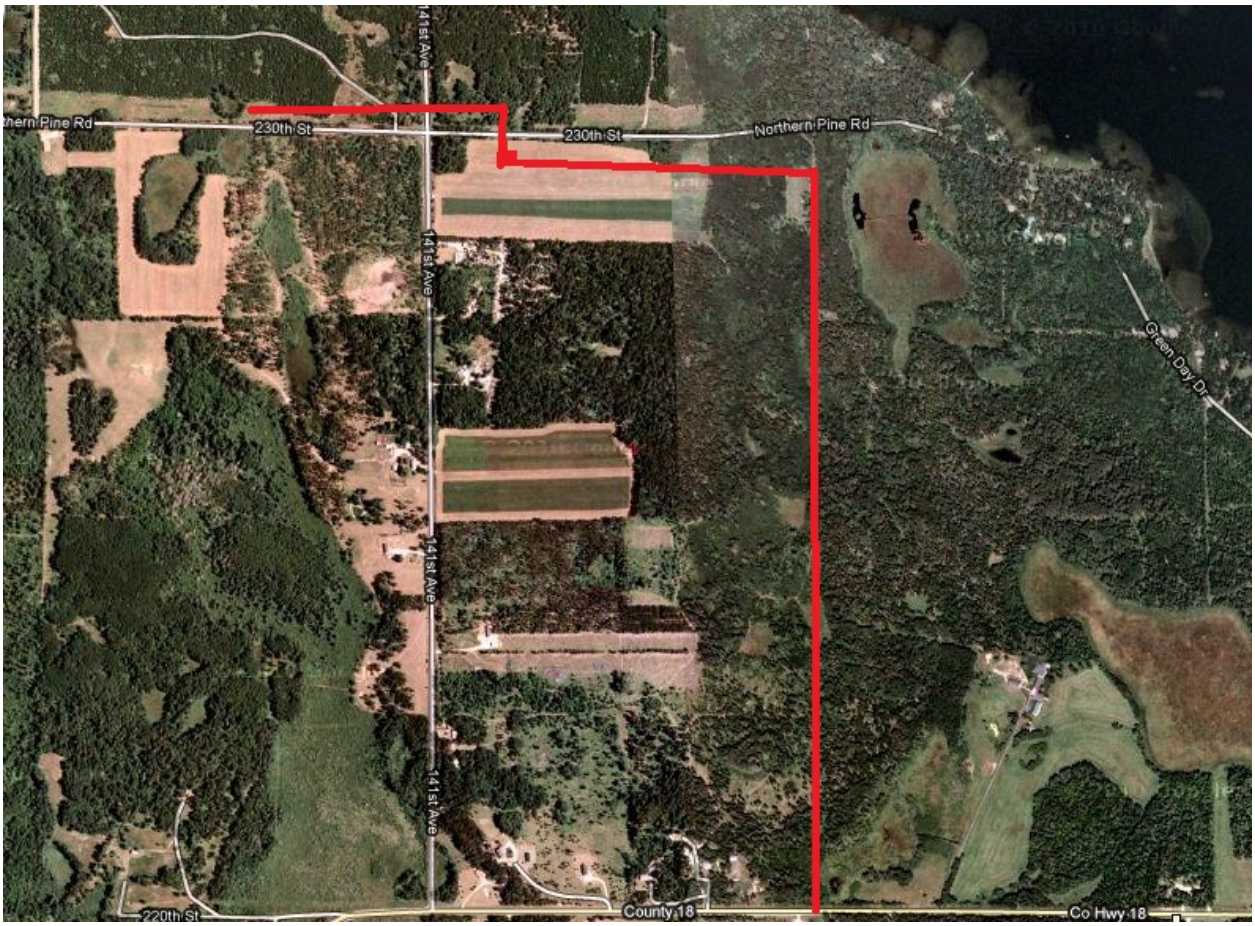
I am the third generation that has owned, lived on, and enjoyed this land, my children are the forth. Additionally my neighbors have their fourth generation enjoying the beauty and peacefulness of their land. It is heart wrenching to think of the impact these proposed transmission lines will have on the area. I am also worried how these power lines will affect my communications and shortwave radio equipment as I am an avid enthusiast.
Thank you for your willingness and patience to consider comments,

Particularly letters as long as this.

Sincerely

Cory Miller.

Could you *please* reply to me to acknowledge receipt of this e-mail?
If I can clarify or for any additional input I may help with please call me anytime at:
218-366-0422 (this rings both my home, and cell phone)
Or e-mail me @ wolvenar@wolvenar.com or reply to this message.


141st Ave
230th St
230th St
Northern Pine Rd
Green Day Dr
220th St
County 18
Co Hwy 18

Traffic
More...
Map
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Earth
County 18
Co Hwy 18
Co Hwy 18
County 18
Co Hwy 4
County 4
500 ft

Minnesota Department of Natural Resources
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June 1, 2010

Scott Ek, State Permit Manager
Energy Facility Permitting
Minnesota Office of Energy Security
85 7th Place East, Suite 500
St. Paul, Minnesota 55101

Re: Route Permit Application and Environmental Assessment Scoping for the Potato Lake 115 kV Transmission Line and Substation in Park Rapids, Minnesota [PUC Docket Number ET2/TL-10-86]

Dear Mr. Ek:

The Minnesota Department of Natural Resources (DNR) has reviewed the route permit application for the Potato Lake 115 kV Transmission Line and Substation Project in Park Rapids, Minnesota and provides the following comments for consideration in scoping the Environmental Assessment (EA). Comments are provided regarding natural vegetation, wildlife, and rare and unique natural features. Information is also provided at this time regarding DNR Land and Water Crossing Licenses.

Natural Vegetation

The Route Permit Application (6.5.3) describes landscape levels and ecological settings using EPA's Level III Ecoregions. EPA's Level III data does not describe habitat at a scale necessary for project level evaluation and does not complement other classification systems used by the DNR (e.g. native plant community classification). In the interest of consistency, the EA should describe the ecological setting of the project using the Ecological Classification System (ECS) to the Land Type Association level. The DNR and the U.S. Forest Service developed the ECS for ecological mapping and landscape classification following the National Hierarchical Framework of Ecological Units (Ecomap 1993). ECS mapping enables resource managers to consider ecological patterns for areas as large as North America or as small as a single timber stand and identify areas with similar management opportunities or constraints relative to that scale.

Recently, preliminary Minnesota County Biological Survey (MCBS) data was provided to the applicant and is described using the Native Plant Community (NPC) classification that integrates with the ECS. This information should be included in the EA.

Every state recently completed a "state wildlife action plan (SWAP)" which identifies conservation needs for species of concern, including threatened and endangered wildlife and other important wildlife species. Minnesota's SWAP titled, "Tomorrow's Habitat for the Wild and Rare" describes conservation concerns for species of greatest conservation need (SGCN) and their *key habitats* within various landscape settings (also characterized using the ECS).

In the interests of consistency and accuracy, Minnesota's SWAP, ECS, NPC descriptions, and preliminary MCBS data should all inform the content and assessment provided by the EA.

Wildlife/Rare and Unique Natural Features

The application (Section 6.5.4) only describes state and federally listed wildlife species. The EA should attempt to identify potential impacts to all significant fish and wildlife resources (e.g. SGCN) and *key habitats* on or near the

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site. As previously mentioned, Minnesota's SWAP should be used to provide this information. Descriptions of measures to avoid or minimize adverse impacts to these wildlife resources should also be included in the EA.

The EA should discuss the effectiveness of the following measures to mitigate potential avian mortality impacts associated with collisions with power lines:

1. Use of line markers - Periods of inclement weather and foggy conditions associated with lakes, water courses and wetlands increase collision risk and have been known to decrease the effectiveness of line marking devices. The EA should assess the effectiveness of various bird flight diverters in mitigating avian mortality due to collision with HVTLs. The assessment should include a review of scientific literature.

2. Underground construction[i] - The EA should assess the effectiveness of underground construction in mitigating visual impacts as described in footnoted Minnesota Rules. It would also be helpful to analyze the effects of an underground crossing at the Potato River crossing (see bird and flyway concentration areas below) as mitigation for avian mortality due to collisions with transmission lines.

3. Pole design (e.g. H-frame vs. single pole) – The effectiveness of various pole designs in mitigating natural resource effects such as bird strikes or vegetation removal should be discussed in the EA. For example, in some locations an H-frame may minimize the number of vertical wires, and therefore minimize bird strikes. In other locations a single pole with a smaller ROW may reduce removal of vegetation providing important habitat.

4. Eliminating usage of ground/shield wires in high-risk areas - Ground wires are installed on transmission lines to dissipate lightning strikes. The effectiveness and practicality of eliminating the use of shield wires through high-risk areas (mentioned below) should be discussed in the EA.

A description of potential impacts such as estimates of annual mortality and specific avoidance, minimization, and mitigation measures for the following bird flyway and concentration areas should specifically be included in the EA:

1. Potato River Crossing – Based on local DNR wildlife staff observations, Trumpeter Swans, Bald Eagle and other waterfowl frequently use the Potato River as a flyway and commonly cross near the bridge area at low altitudes. Bald Eagles also commonly perch in the trees near the dam and hunt the associated waters for waterfowl.

2. Public Water Wetland 514P (T141N R35W, Sections 27 and 34) and adjoining wetlands – The DNR considers this area to have higher risk of waterfowl mortality due to collisions with HVTLs.

3. Public Water Wetland 517P and adjoining wetlands along Hwy#71- Trumpeter Swans are known to frequent these wetlands. The DNR also considers this area to have higher risk of bird collisions with HVTLs.

If other project alternatives are included in the scope of the EA, a description of the aforementioned mitigation measures should also be included for all public waters, public waters wetlands and adjoining floodplains and/or wetlands.

Please see the attached DNR Natural Heritage Information System (NHIS) review letter dated December 16, 2009. Discussion of resources and concerns identified in this heritage review should be included in the EA. The EA should also identify how best management practices suggested in the NHIS review will be implemented.

Other Topics

The EA should discuss disposal or wasting of the back dirt resulting from the excavation of the tower footings.

The EA should describe the functions provided by the project area wetlands and how impacts associated with pole placement (fill placement and type conversion) and maintenance will change those functions. Specific mitigation proposed by the applicant and/or required by laws should also be included in the assessment.

The EA should identify and discuss the impacts associated with additional work areas (e.g. marshaling yards) on or adjacent to the ROW that may be needed for construction, storage, or staging of materials.

DNR Land and Water Crossing Licenses

The review and issuance of DNR land and water crossing licenses are coordinated by the Division of Lands & Minerals. The proposed project in Hubbard County will be handled in the Northwest Region. The Lands & Minerals Realty Specialist in the NW Region is Walter Lindahl (218/308-2683). The applicant should contact Walter Lindahl with any questions about completing the land or water crossing applications.

The project proposer should allow adequate time for review and modification of the license applications after the completion of environmental review. The following information should be included in the license applications:

1. Length and width of each proposed state land and public water depicted on maps and plan sheets. Each crossing must be identified by legal description to the forty.

2. Clearing activities, construction methods, schedule, and staging of operations including equipment and materials storage proposed on state land or in public waters.

3. Permanent and temporary access points to the proposed ROW affecting state land or public waters.

4. Temporary work areas on state land adjacent to the ROW that may be needed during construction. These areas should be clearly delineated and identified in the application materials.

5. General location of existing utility lines or transportation ROWs within or near the proposed ROW on state land or in public waters.

6. State trails or Grant in Aid trails proposed to be crossed.

7. Location and design of tower structures including proposed methods for disposal or wasting of the back dirt resulting from the excavation of the tower footings.

8. Restoration methods including proposed seed mixes and invasive species control measures.

9. ROW maintenance methods and schedule on state land or in public waters.

In addition, the project proposer should be aware of the following points related to the licensing of state land and public water crossings:

1. DNR invasive species standards will apply to state-administered lands and public waters to include cleaning of equipment.

2. Certain pesticides are restricted from use on certified forest lands. Adequate notice of herbicide or pesticide use on state lands will be required and only approved herbicides will be allowed.

3. Use of native species for re-vegetation and clean weed free straw for mulch will be required on certain state land and public water crossings.

4. In-stream work on certain public waters (trout streams, for example) must be avoided at prescribed times to accommodate fish spawning.

5. State lands purchased with the assistance of various Federal grant programs may require mandatory federal aid review and approval before the license can be issued. Supplemental information may be required for the federal review. If federal approval is required, additional time will be needed to process the application.

6. If a state land parcel becomes isolated due to the construction of the ROW, the project proposer must provide access to the isolated state land across the ROW.

7. A monitoring fee will be assessed for DNR projected reasonable costs for monitoring the construction of the utility line and preparing special terms and conditions of the license to ensure proper construction.

8. Permission for temporary access to the ROW across state land is considered a separate transaction and may be granted through a lease. Requests for temporary access are subject to review and approval, and in some cases may not be granted. Allow adequate time for processing access lease requests.

Thank-you for the opportunity to provide review of the route permit application and scoping comments for the Potato Lake Transmission Line and Substation Project EA. Please contact me if any clarification is needed or if you have any questions.

Sincerely,

Jamie Schrenzel
Principal Planner
Environmental Review Unit
(651) 259-5115

Enclosures: 1

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[i] 6135.1200 STANDARDS FOR STRUCTURE DESIGN.

Subpart 1.Location of utility. With regard to locating the utility overhead or under the ground or water:

A. Primary consideration shall be given to underground and underwater placement in order to minimize visual impact. If the proposal is for overhead placement, the applicant shall explain the economic, technological, or land characteristic factors, which make underground placement infeasible. Economic considerations alone shall not be the major determinant. Statutory Authority: *MS* s 84.415 Posted: *June 11,2008*