

Minnesota Department of Natural Resources

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



March 23, 2011

Bill Storm, State Permit Manager
Minnesota Office of Energy Security
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198

Re: Application for a Route Permit for the 115 kV Glencoe to Waconia Transmission Line Upgrade Project [PUC Docket No. E002/TL-10-249]

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the application for a route permit for the 115kV Glencoe to Waconia Transmission Line Upgrade Project. Generally, the application for a route permit for the Glencoe to Waconia Project included a helpful amount of detail, particularly in the Environmental Feature Maps (Appendix B, Part 2), and showed an effort to address DNR early coordination comments during initial stages of the environmental review and permitting process. The following additional input is provided regarding proposed avian diverter locations, wetland effects, lay down areas, vegetation management and the DNR Natural Heritage Information System (NHIS).

A previous NHIS data search indicated the presence of rare bird species, waterbirds, and bald eagles near the project area. The DNR recommended swan type diverters to address possible avian collision risk in an early coordination letter dated December 11, 2009. The project plan incorporates diverters near water bodies as discussed on pages 71-72 of the route permit application and depicted in the Environmental Features Maps in Appendix B. Incorporation in the route permit application and early planning regarding swan diverters is appreciated. Though diverter locations are appropriately located where water bodies are directly adjacent to lines, there may be some adjustments that could be incorporated with diverter locations that would be more beneficial in minimizing the potential for avian collisions in this area. One example is depicted in Environmental Features Map Segment 4 where it may be appropriate to extend diverters further northeast between Hydes and Rice Lake to address flight movement between the lakes. An effort to finalize, and if necessary modify, proposed locations with the DNR is recommended.

More information in revisions to the application or other future data submittals on where lay down areas would be located and proposed avoidance of impacts such as introduction of invasive species is recommended (page 32).

More information regarding vegetation management and methods of vegetation management is recommended (page 32-33).

A discussion in this document or other appropriate document of minimization of forestry impacts near waterways due to clearing is recommended (page 58). The route permit application indicates that an estimated 61 poles will be placed within wetland areas. The applicant should avoid impacts to wetland areas where and when feasible by spanning or through line route adjustments. Documents should include a more detailed discussion on pole placements both within the existing transmission line corridor and the new line route. Information could include or provide further explanation on poles within the existing corridor. For example, will new poles be aligned in the same configuration as the existing poles or will there be a new configuration of pole locations? Other potential impacts such as avian collisions or invasive species should also be considered in these more sensitive areas, particularly if there are large wetland complexes that would be crossed by the route.

The Natural Heritage Information System (NHIS) letter referenced in the route permit application is dated October 2009. The Division of Ecological and Water Resources maintains the NHIS, a collection of databases that provides information on Minnesota's rare plants, animals, native plant communities, and other rare features. The NHIS is the most complete source of data on Minnesota's rare natural features because it is continually updated as new information becomes available. As such, our general policy is that Natural Heritage reviews should not be considered valid if it has been more than one year since the review. Please contact Lisa Joyal, Endangered Species Environmental Review Coordinator, at lisa.joyal@state.mn.us or 651-259-5109 to request an updated search of the database. Please reference Correspondence # ERDB 20100236 in your communication.

Thank-you for your consideration of DNR input regarding the application for a route permit for the Glencoe to Waconia Transmission Line Project. Please contact me with any questions.

Sincerely,



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