

Minnesota Department of Natural Resources

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



June 1, 2011

Bill Storm, State Permit Manager
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198

Re: Application for a Route Permit for the 115 kV Savanna Rebuild Project
[PUC Docket Number: ET-2, E015/TL-10-1307]

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application for the 115 kV Savanna Rebuild Transmission Project. As the project is planned using existing transmission corridors, environmental impacts will likely be less than those of a project constructed using new corridors. Impacts and mitigation measures should still be considered to address avian collision, nesting, and right-of-way management considerations occurring from a rebuild project.

Maintenance of the power lines, poles and rights-of-way can affect wildlife, depending on the methods used. For example, some herbicides have been shown to affect amphibians. A plan should be included in future documents to avoid application of herbicides near wetlands, lakes, streams, or rivers.

Ospreys often nest on transmission line towers or trees near transmission lines. The DNR should be contacted if any nests are proposed to be removed as a permit will be required and will include scheduling guidelines. The installation of nesting platforms may also be recommended as part of this correspondence.

The DNR is concerned about avian collision risk from transmission lines in areas with wetlands, public water crossings, and sometimes where agricultural land is present that birds may use for migratory stopover or feeding areas. The transmission pole height is also proposed to be higher, which may change the risk to birds. The Route Permit Application (Page 9-35) states that the applicant will work with the DNR and USFWS to discuss areas that may require marking the transmission line with bird diverters. Some new diverter technologies are available, including those designed to lessen bird strikes during nighttime or low light conditions. The DNR would appreciate the opportunity to recommend specific locations and discuss types of bird diverters. We suggest that the applicant submit maps and/or a narrative with proposed diverter locations included for review by wildlife agencies.

Thank-you for the opportunity to provide comments for the 115 kV Savanna Transmission Project. Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Schrenzel".

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

Storm 6/1/2011



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