



# Minnesota Pollution Control Agency

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December 2, 2011

Mr. Ray Kirsch  
State Permit Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

Re: Parkers Prairie 115 kV Transmission Line  
PUC Docket Number: ET2/TL-11-867

Dear Mr. Kirsch:

Thank you for the opportunity to review and comment on the route permit for the Parkers Prairie project (Project), a 115 kV transmission line located in Otter Tail County, Minnesota. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, MPCA staff has the following comments for your consideration.

### **Section 7.1.2 Substation Modifications**

Part 7.1.2 indicates that, "If it is determined that more than one acre of soil will be disturbed, LREC and/or the Applicant will obtain a National Pollutant Discharge Elimination System (NPDES) construction stormwater permit from the Minnesota Pollution Control Agency (MPCA) and will prepare the required Stormwater Pollution Prevention Plan (SWPPP)."

A two-mile project of this nature will very likely create sufficient change in vegetative cover to result in accelerated stormwater runoff (removal of brushy material, soil compaction, and movement of heavy equipment are all likely to contribute to such a condition) on one acre or more of land. The project proposers should plan to develop an SWPPP and obtain NPDES Permit coverage prior to beginning construction.

### **Section 8.5.2 Water Resources - Wetlands**

In this section the document states, "Wetlands listed on the NWI may be inconsistent with current wetland conditions; however, NWIs are the most accurate and readily available database of wetland resources within the Project area and were therefore used to identify wetlands along the proposed Route. These maps show that there are no wetlands in the Proposed Route."

On the same page, under Section 8.5.3 - Natural Vegetation, the document states "the Project is located in the Northern Central Hardwoods Ecoregion, which has undulating and rolling plain with drumlins and a mix of woodland, row crops and pasture. Vegetative communities along the Proposed Route include cultivated fields, upland deciduous forests, shrubby grasslands, grasslands, and various types of wetlands."

Although the National Wetland Inventory (NWI) clearly does not indicate that there are wetlands along the proposed route, the document appears to indicate that there are, based on criteria other than NWI. Please clarify as to whether there are wetlands that must be delineated or identified with the project route.

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Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this project, please contact Karen Kromar of my staff by e-mail at [karen.kromar@state.mn.us](mailto:karen.kromar@state.mn.us) or by telephone at 651-757-2508.

Sincerely,



Craig Affeldt  
Supervisor  
Environmental Review Unit  
Resource Management and Assistance Division

CA:mbo

cc: Rick Heuring, Great River Energy, Maple Grove  
Karen Kromar, MPCA, St. Paul  
Scott Lucas, MPCA, Brainerd  
Reed Larson, MPCA, Brainerd