Minnesota Department of Natural Resources
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Minnesota
DEPARTMENT OF NATURAL RESOURCES

August 1, 2012

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

Re: Applications for a Route Permit and Certificate of Need for the Scott County-Westgate 69 kV to 115 kV Transmission Upgrade Project
[PUC Docket Nos. E002/TL-11-948 and E002/CN-11-332]

Dear Mr. Birkholz:

The Minnesota Department of Natural Resources (DNR) has reviewed the Scott County – Westgate 69 kV to 115 kV Transmission Upgrade Project Route Permit Application and a letter from Xcel Energy dated June 18, 2012 responding to DNR comments on application completeness and accuracy (enclosed). The DNR appreciates the response letter from Xcel Energy and offers the following comments in response to these documents to inform scoping for an Environmental Assessment (EA).

Segments 2-10 are "replace and rebuild" sections of the line. The Route Permit Application estimates that 61 out of 455 poles will be located within floodplains, wetlands or other water surface features. This number was based on an average spacing of poles. The project design should be adjusted to relocate poles outside of wetlands, floodplains and sensitive areas as much as possible. Abandoned poles should be removed completely or cut off at the base where appropriate.

Response 6 from the June 18, 2012 letter from Xcel Energy to the DNR (attached) refers to an upcoming plan for noxious weeds and invasive species management for state and non-state lands for the project. A discussion of invasive species management for work in wetlands should also be included in this plan for both public water wetlands and non-public wetlands. Please also see the following website for additional information and flyers for working in public waters or on public lands: http://www.dnr.state.mn.us/invasives/dnrlands.html. Some of this information could also inform the plan for work on non-public lands and waters. The DNR recommends including as much of the invasive species management plan in the EA as possible.

The June 18, 2012 Xcel Energy letter described proposed methods of reducing the possibility of a threatened species taking of the Blanding's turtle. Additional applicable recommendations for this project regarding Blanding's turtles are the following: 1) avoid use of fertilizers and pesticides within wetlands; 2) utilize effective erosion control to keep sediment from reaching wetlands and lakes; and 3) utilize wildlife friendly erosion control near Blanding's turtle habitat. Also, construction personnel should notify the DNR Regional Nongame Specialist if they encounter any turtles.

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Thank you for your consideration of these comments. Please contact me with any questions.

Sincerely,

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

Enclosures: 1

C: Tricia DeBleeckere, PUC
Tim Rogers, Xcel Energy
Melissa Doperalski, DNR