

# Minnesota Department of Natural Resources

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October 11, 2012

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

Re: Route Permit Application and EA Scoping for the Chaska Area 115 kV Transmission Line  
[PUC Docket Number: E002/TL-12-401]

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application and Environmental Assessment (EA) Draft Scoping Document for the Chaska Area 115 kV Transmission Line Project. Generally, the EA Draft Scoping Document includes categories for assessment that the DNR agrees will help with the analysis of effects to natural resources. The following comments regarding bird diverters, public land and water crossings, wildlife habitat, invasive species, and information requests are included for your consideration regarding the Route Permit Application and recommended content of the EA.

## Bird Diverters

The Route Permit Application includes proposed bird diverter locations. Providing bird diverter locations at this stage in the review process is helpful. The DNR requests Geographic Information System (GIS) shapefiles of the route with a layer included for bird diverters. This will help reviewers understand a more broad landscape perspective. If shapefiles are provided soon, the DNR hopes to give feedback in time for possible inclusion in the EA.

## Public Land and Water Crossings

The proposed project crosses 14 total DNR public waters and public water wetlands. The EA should include more discussion than the Route Permit Application on specific crossing approaches and planned mitigation measures. An example would be identifying the distance of vegetative buffers from the water surface up the shore.

It also appears that the Minnesota Valley State Recreational Area will be crossed. Applicants should provide existing easements for this crossing (and water crossings) to Maryanna Harstad (651-259-5781) with the DNR Division of Lands and Minerals for review of applicability.

The Route Permit Application discusses undeveloped areas that will be impacted, specifically in Segment 6. This includes the Minnesota River Crossing. Although this crossing is considered a rebuild section, the Route Width and ROW will be widened. The EA should include a thorough discussion of the proposed impact to resources for the Minnesota River Crossing and should identify mitigation measures that the project proposer has either committed to or that are proposed as conditions in the PUC Route Permit.



The License to Cross Public Lands and Waters for this project may require conditions in addition to those included in and/or recommended to be included in the Public Utilities Commission (PUC) Route Permit.

### Wildlife Habitat

The Route Permit Application states that wildlife will be temporarily displaced, but does not provide measures to minimize or mitigate this effect. The DNR recommends utilizing wildlife friendly erosion control mesh particularly in areas used by amphibians and other wildlife such as wetlands and near water crossings. Use in upland habitat, and any other feasible location along the route, is also recommended. An information sheet is enclosed describing wildlife friendly erosion control.

One Central Region Regionally Significant Ecological Area was identified within the route. More discussion on avoidance, minimization and mitigation specific to possible impacts to the Central Region Regionally Significant Ecological Area should be included in the EA.

### Invasive Species

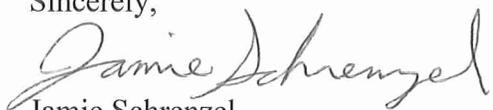
The DNR provides invasive species best management practices, particularly for work in public lands and waters at the following webpage: <http://www.dnr.state.mn.us/invasives/dnrlands.html> . The developer should also review the following webpage including the document titled *Invasive Species Best Management Practices (BMPs) for the Transportation and Utility Rights-of-Ways in Wisconsin* for helpful guidance regarding invasive species and transmission lines: <http://council.wisconsinforestry.org/invasives/transportation/>. The DNR recommends including invasive species management plans in the EA.

### Information Request

GIS shapefiles would be useful for providing feedback regarding bird diverter locations and would also help DNR reviewers to better and more efficiently assess project routing by overlaying DNR natural resource data with the outline of the project area. As discussed in above comments regarding bird diverters, the DNR requests GIS shapefiles for the proposed project.

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

Enclosure: 1

C: Tricia De Bleeckere, PUC  
Sage Tauber, Xcel Energy