WESTERN PLYMOUTH NEIGHBORHOOD ALLIANCE INFORMATION REQUEST

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☐ **Public Document – Trade Secret Data Excised**
☒ **Public Document**

Applicants Xcel Energy and Great River Energy
Docket No.: PUC E-002/TL-11-152
OAH 8-2500-22806-2
Response To: Western Plymouth Neighborhood Alliance Information Request No. 5

Date Received: October 4, 2012

Question:

A. Page 106 of the Route Application states, "The rebuild portion of the Proposed Route crosses approximately 11,200 lineal feet of wetland and six of these crossings consist of wetland areas that are more than 500 feet in span distance." Please
   1. Define the section of the Proposed Route that is included in the "rebuild portion;"
   2. State the total lineal feet of the "rebuild portion" of the Proposed Route;
   3. Explain the significance of the fact that six of the crossings in the rebuild portion of the Proposed Route would include wetland areas that are more than 500 feet in span distance.

B. Page 106 of the Route Application states, "Eight of these wetland crossings are PWI basins and 24 of these wetland crossings are potentially U.S. Army Corps of Engineers ("ACOE") jurisdictional wetlands."
   1. Identify on a map which 24 wetland crossings Applicants believe are potentially ACOE jurisdictional wetlands;
   2. State Applicants' current understanding of the criteria by which it would be determined which wetlands are or are not ACOE jurisdictional wetlands;
   3. State Applicants' current understanding of whether the proposed wetlands crossings affect ACOE wetlands applying the criteria in subparagraph (2) above.

C. Table 21 on page 106 of the Route Application states that the rebuild portion of the Proposed Route contains 93.12 acres of wetlands from 0-200 feet of the Proposed Route.
   1. Please clarify whether this table measures distance from the route center line or the edge of right-of-way.
   2. Please estimate the acreage of wetlands that will be dredged or filled a) permanently or b) temporarily, as a result of construction of the Proposed Route and any access roads needed for construction and/or maintenance.
   3. Please estimate the acreage of floodplain that will be dredged or filled a) permanently or b) temporarily, as a result of construction of the Proposed Route and any access roads needed for construction and/or maintenance.
   4. Please state whether Applicants have applied to the ACOE for a permit to dredge and fill wetlands and/or floodplain and, if so, what filing number is associated with the application.

D. For the segments of the Applicants' Proposed Route 1) from the intersection of the Proposed Route with Highway 55 west to the intersection of the Proposed Route with Holy Name Drive and 2) from the intersection of the Proposed Route with Holy Name Drive west to the intersection of the Proposed Route with Tamarack Drive, please
   1. Describe in narrative or identify on a map with appropriate notations each wetland and floodplain within the Proposed Route right-of-way with a span to be crossed of a) from 100 to 300 feet; b) from 300 to 500 feet; c) from 500 to 1,000 feet; d) more than 1,000 feet.
   2. Please state the number of "Y-frame" structures estimated to be required to span wetlands or floodplains in the above-described segments of the Proposed Route.
   3. Please state the number of structures estimated to be constructed on a) wetlands; b) wooded wetlands; c) floodplains; d) areas containing mature trees; and e) agricultural crop lands in the above-described segments of the Proposed Route.
   4. Please provide a map identifying approximate locations of any structures identified in subparagraph (3) above.

D. Page 109 of the Route Application states "it may be possible that a few poles for the Proposed Route will need to be placed in a mapped floodplain because the span distances across at least one floodplain is greater than 1,200 feet."
   1. Please identify any locations along the Proposed Route where Applicants believe that span distances across a wetland or floodplain are greater than 1,200 feet.

2. Please explain whether Applicants believe that any wetland or floodplain with a span distance of less than 1,200 feet can be spanned without placing a pole in the wetland or floodplain and, if so, the basis for that belief.

Response:

A. Page 106 of the Route Application states, "The rebuild portion of the Proposed Route crosses approximately 11,200 lineal feet of wetland and six of these crossings consist of wetland areas that are more than 500 feet in span distance." Please
   1. Define the section of the Proposed Route that is included in the "rebuild portion;"

   a. The rebuild portion of the route is the 8-mile section of the route that is currently occupied by the Great River Energy owned 69 kV transmission line BD. (See **Attachment 5-1**).

   2. State the total lineal feet of the "rebuild portion" of the Proposed Route;

   a. The total lineal feet of the "rebuild portion" of the Project Route is 424,267 feet.

   3. Explain the significance of the fact that six of the crossings in the rebuild portion of the Proposed Route would include wetland areas that are more than 500 feet in span distance.

   a. The statement that there are six wetland crossings in the rebuild portion of the Proposed Route that are greater than 500' was simply a reference to the length of these wetland crossings.

B. Page 106 of the Route Application states, "Eight of these wetland crossings are PWI basins and 24 of these wetland crossings are potentially U.S. Army Corps of Engineers ("ACOE") jurisdictional wetlands."
   1. Identify on a map which 24 wetland crossings Applicants believe are potentially ACOE jurisdictional wetlands;

   a. See **Attachment 5-2**.

   2. State Applicants' current understanding of the criteria by which it would be determined which wetlands are or are not ACOE jurisdictional wetlands;

a. ACOE jurisdictional wetlands are those wetlands that are adjacent to or have an interstate commerce connection. Regional ACOE offices determine if a wetland is within ACOE jurisdiction during a review process.

3. State Applicants' current understanding of whether the proposed wetlands crossings affect ACOE wetlands applying the criteria in subparagraph (2) above.

a. Affects from the proposed wetland crossings will be in the same location and of equal areas as the existing conditions in ACOE- designated wetlands. See **Attachment 5-2**.

C. Table 21 on page 106 of the Route Application states that the rebuild portion of the Proposed Route contains 93.12 acres of wetlands from 0-200 feet of the Proposed Route.

1. Please clarify whether this table measures distance from the route center line or the edge of right-of-way.

a. This measurement is taken from the route center line.

2. Please estimate the acreage of wetlands that will be dredged or filled a) permanently or b) temporarily, as a result of construction of the Proposed Route and any access roads needed for construction and/or maintenance.

a. There are no plans to fill or dredge wetlands for construction of the line.

3. Please estimate the acreage of floodplain that will be dredged or filled a) permanently or b) temporarily, as a result of construction of the Proposed Route and any access roads needed for construction and/or maintenance.

a. There are no plans to fill or dredge floodplains for the construction of the line.

4. Please state whether Applicants have applied to the ACOE for a permit to dredge and fill wetlands and/or floodplain and, if so, what filing number is associated with the application.

a. See responses to IR No. 5 C3 and C4.

D. For the segments of the Applicants' Proposed Route 1) from the intersection of the Proposed Route with Highway 55 west to the intersection of the Proposed Route with Holy Name Drive and 2) from the intersection of the Proposed Route

with Holy Name Drive west to the intersection of the Proposed Route with Tamarack Drive, please

1. Describe in narrative or identify on a map with appropriate notations each wetland and floodplain within the Proposed Route right-of-way with a span to be crossed of a) from 100 to 300 feet; b) from 300 to 500 feet; c) from 500 to 1,000 feet; d) more than 1,000 feet.

a. See **Attachment 5-3**.

2. Please state the number of "Y-frame" structures estimated to be required to span wetlands or floodplains in the above-described segments of the Proposed Route.

a. At this time, Applicants anticipate replacing structures in wetlands and/or floodplains at or near existing pole locations; these locations would not require the use of Y-frame structures.

3. Please state the number of structures estimated to be constructed on a) wetlands; b) wooded wetlands; c) floodplains; d) areas containing mature trees; and e) agricultural crop lands in the above-described segments of the Proposed Route.

a.

Proposed Route from the intersection of the Proposed Route with Highway 55 west to the intersection of the Proposed Route with Holy Name Drive	
Land Type	**Poles**
Wetland	5
Woody Wetland	0
FEMA Floodplain	3
Cropland	2
Forest	0
Total Poles*	7
*Some poles fall into more than one category. Refer to map.	

Proposed Route from the intersection of the Proposed Route with Holy Name Drive west to the intersection of the Proposed Route with Tamarack Drive	
Land Type	**Poles**
Wetland	3
Woody Wetland	1
FEMA Floodplain	4

Cropland	3
Forest	0
Total Poles*	8
*Some poles fall into more than one category. Refer to map.	

4. Please provide a map identifying approximate locations of any structures identified in subparagraph (3) above.

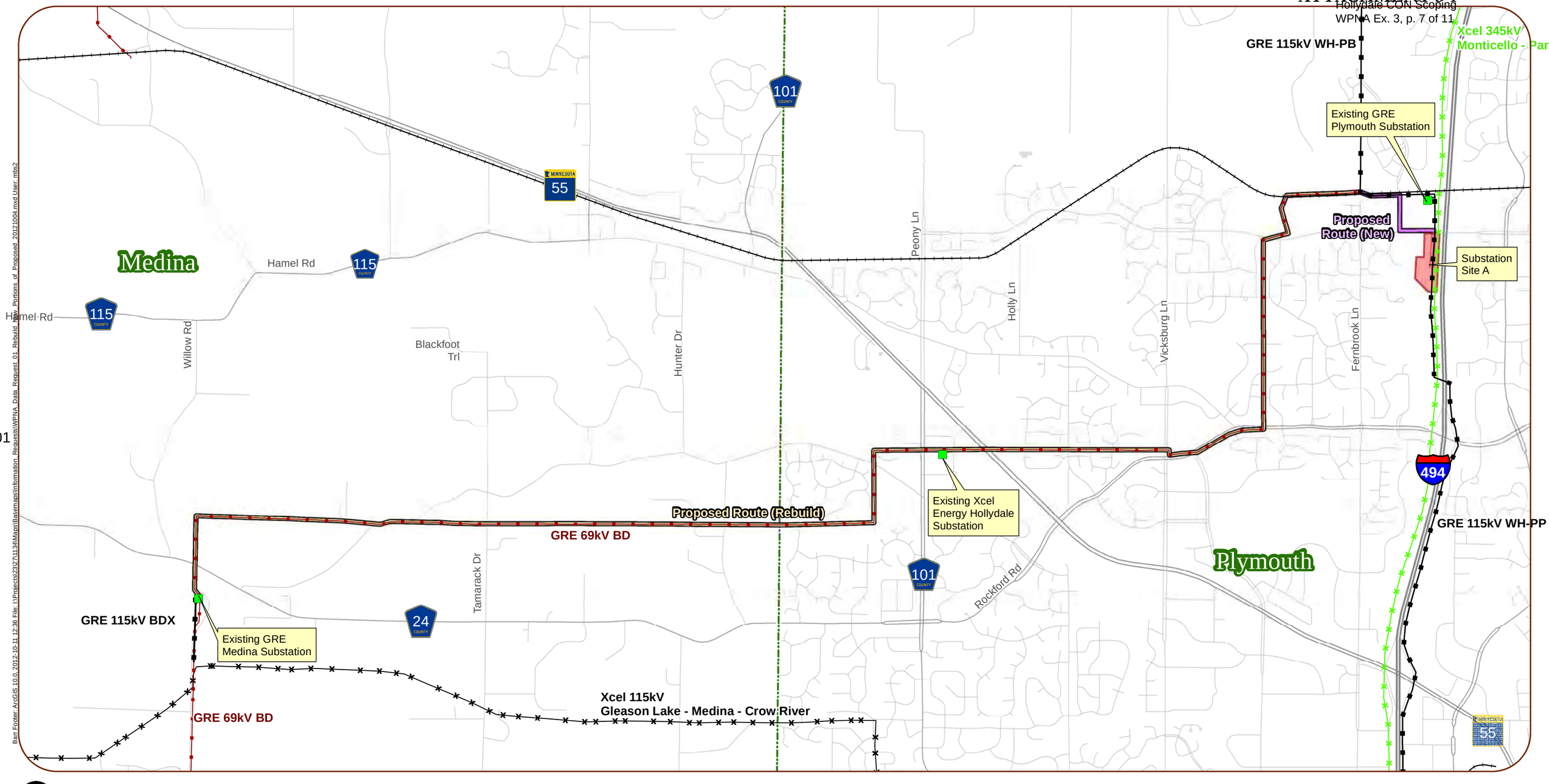
a. See **Attachment 5-4**.

E. Page 109 of the Route Application states "it may be possible that a few poles for the Proposed Route will need to be placed in a mapped floodplain because the span distances across at least one floodplain is greater than 1,200 feet."

1. Please identify any locations along the Proposed Route where Applicants believe that span distances across a wetland or floodplain are greater than 1,200 feet.
2. Please explain whether Applicants believe that any wetland or floodplain with a span distance of less than 1,200 feet can be spanned without placing a pole in the wetland or floodplain and, if so, the basis for that belief.

a. Please see responses to IR No. 5 D1 and D2 above.

Response by: RaeLynn Asah
Title: Permitting Analyst
Department: Siting and Land Rights
Telephone: 612-330-6512
Date: October 16, 2012



0 2,500 5,000 Feet

0 800 1,600 Meters

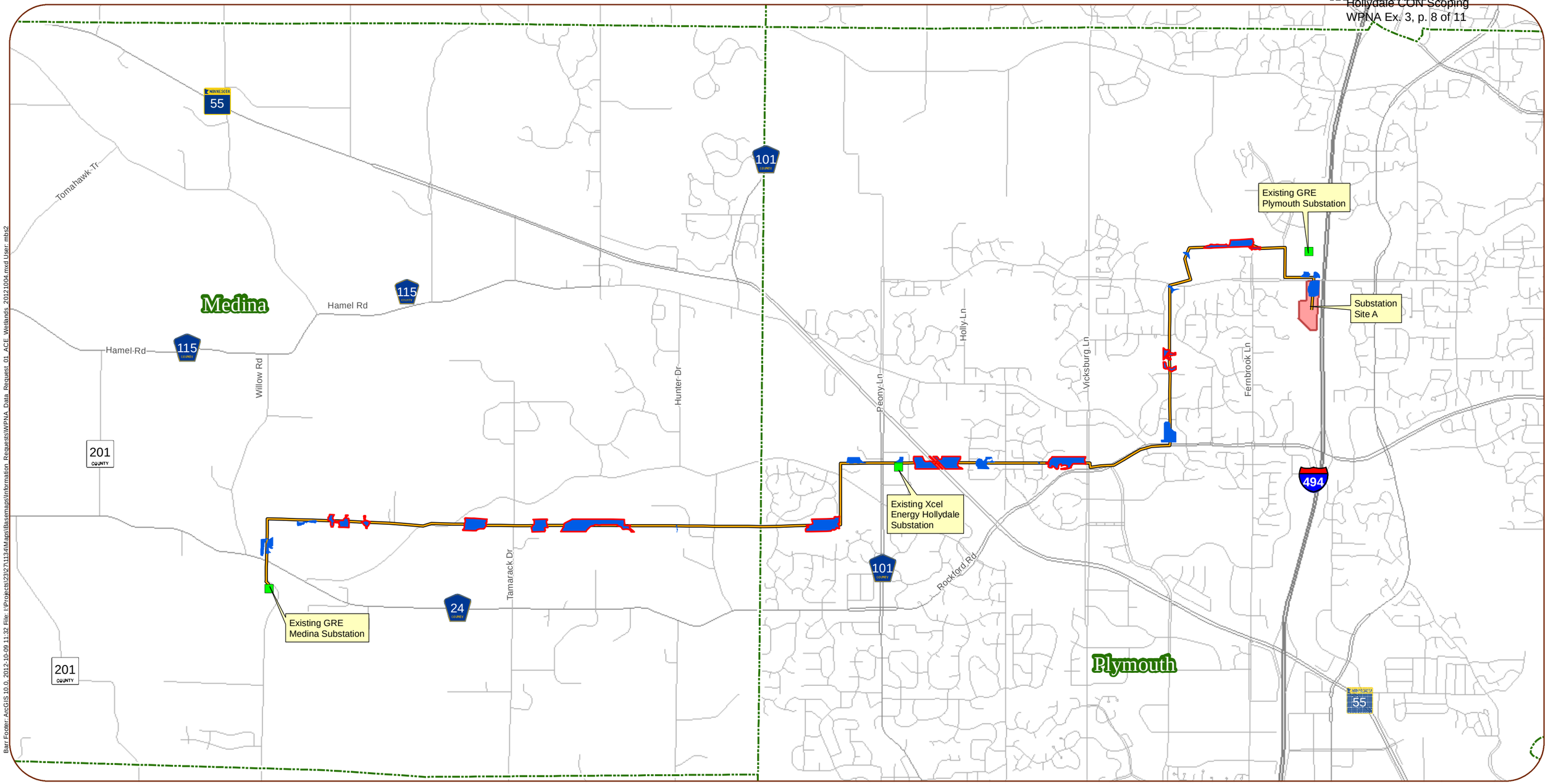
- Proposed Route (Rebuild Portion - 424,267ft)
- Proposed Route (New Portion - 4,015ft)
- Existing Substation
- Substation Site A

Existing GRE Transmission Line
- 69 kV
- 115 kV

Existing Xcel Energy Transmission Line
- 115 kV
- 345 kV

Data Sources:
Xcel Energy, MNDOT

PROPOSED ROUTE
REBUILD AND NEW PORTIONS
Hollydale Project



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N

0 3,000 6,000
Feet

0 1,000 2,000
Meters

- Proposed Route
- Existing Substation
- Substation Site A
- Barr Wetland (Clipped to 200ft of Proposed Route)
- Believed Potential ACOE Jurisdictional Wetland

*Note: The wetland tables in Appendix G of the Route Permit Application represent individual wetland crossings. Additionally, these crossings are broken up by PLS section. As such, they do not represent a count of unique wetland features along the Proposed Route.

Data Sources:
Xcel Energy, MNDOT, Barr Engineering, USGS, MNDNR, USFWS

POTENTIAL ARMY CORPS
OF ENGINEERS JURISDICTIONAL
WETLAND LOCATIONS
Hollydale Project

N

0 1,000 2,000 Feet

0 300 600 Meters

Data Sources:
Xcel Energy, MNDOT, Barr Engineering

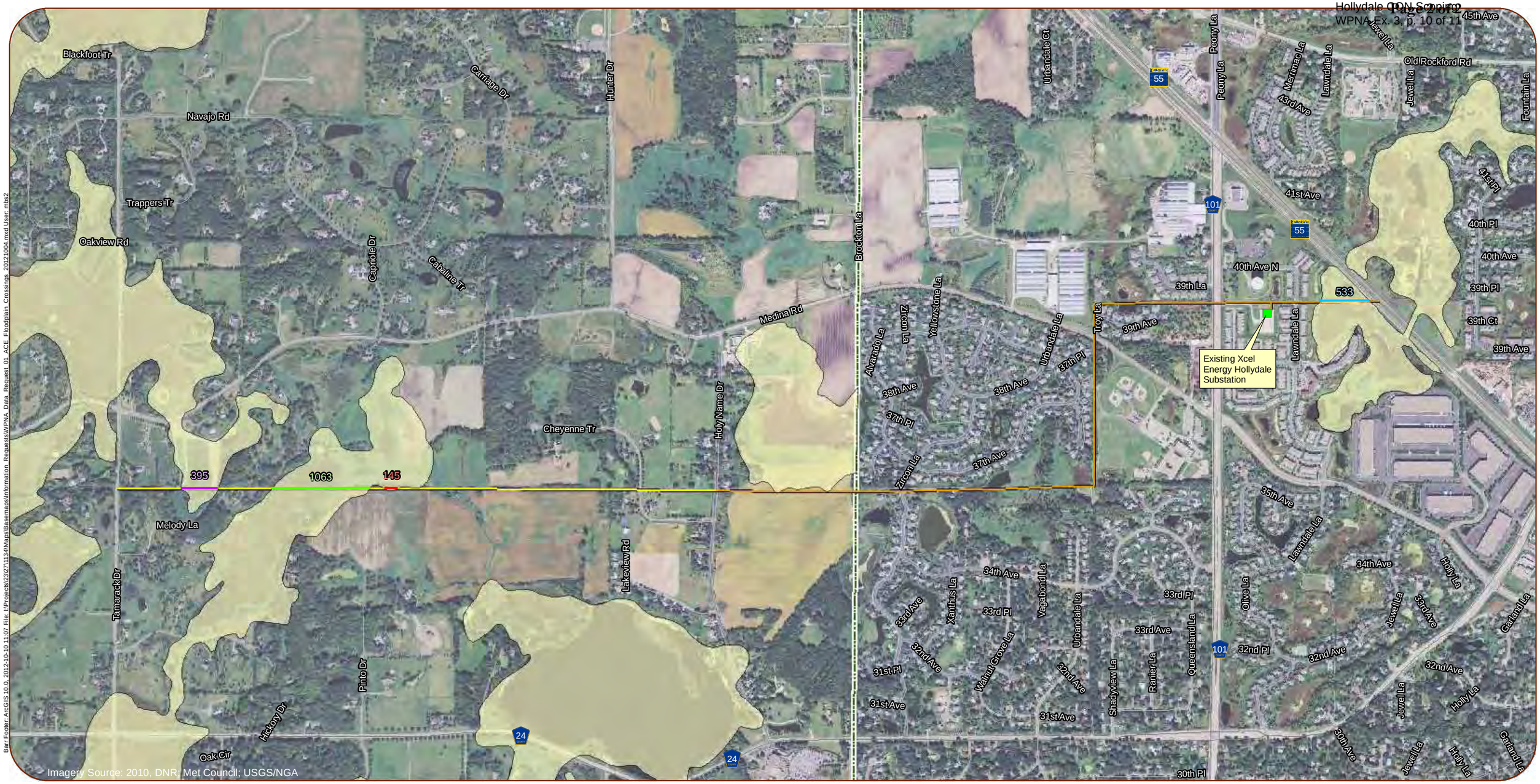
- Proposed Route (Holy Name Dr to Hwy 55)
- Proposed Route (Tamarack Dr to Holy Name Dr)
- Existing Substation
- Barr Wetland (Clipped to 200ft of Proposed Route)

Wetland Crossing Lengths (Labeled in Feet)

- 100 - 300ft
- 300 - 500ft
- 500 - 1000ft
- >1000ft

*Note: The wetland tables in Appendix G of the Route Permit Application represent individual wetland crossings. Additionally, these crossings are broken up by PLS section and wetland type. As such, they do not represent a count of unique wetland features along the Proposed Route.

WETLAND CROSSING LENGTHS ALONG PORTIONS OF THE PROPOSED ROUTE
Hollydale Project



N

0 1,000 2,000 Feet

0 300 600 Meters

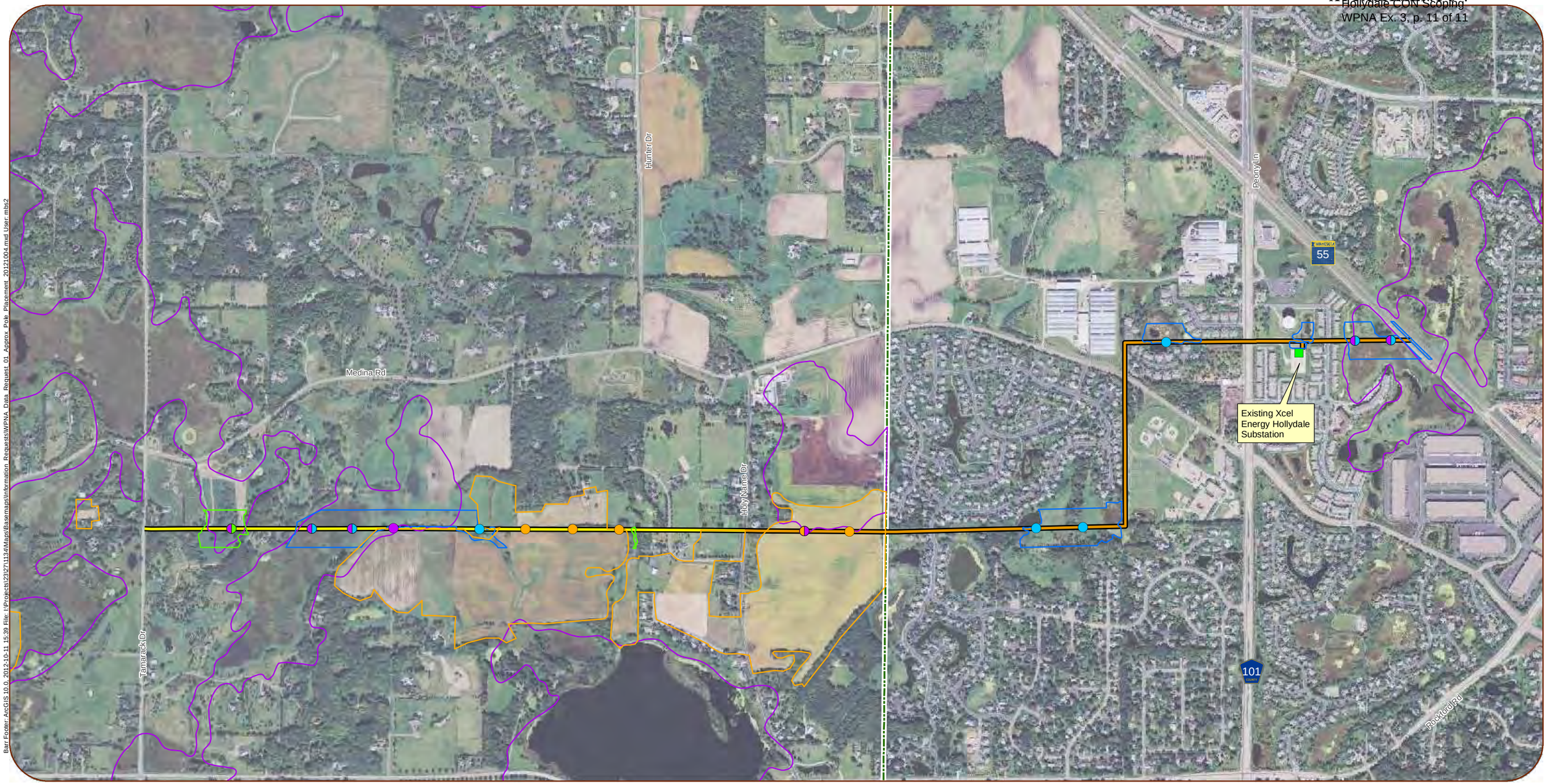
Data Sources:
Xcel Energy, MNDOT, FEMA

- Proposed Route (Holy Name Dr to Hwy 55)
- Proposed Route (Tamarack Dr to Holy Name Dr)
- Existing Substation
- FEMA Floodplain (Q3 Data)

Floodplain Crossing Lengths (Labeled in Feet)

- 100 - 300ft
- 300 - 500ft
- 500 - 1000ft
- >1000ft

FLOODPLAIN CROSSING
LENGTHS ALONG PORTIONS OF
THE PROPOSED ROUTE
Hollydale Project



N

0 1,000 2,000 Feet

0 300 600 Meters

Data Sources:
Xcel Energy, MNDOT

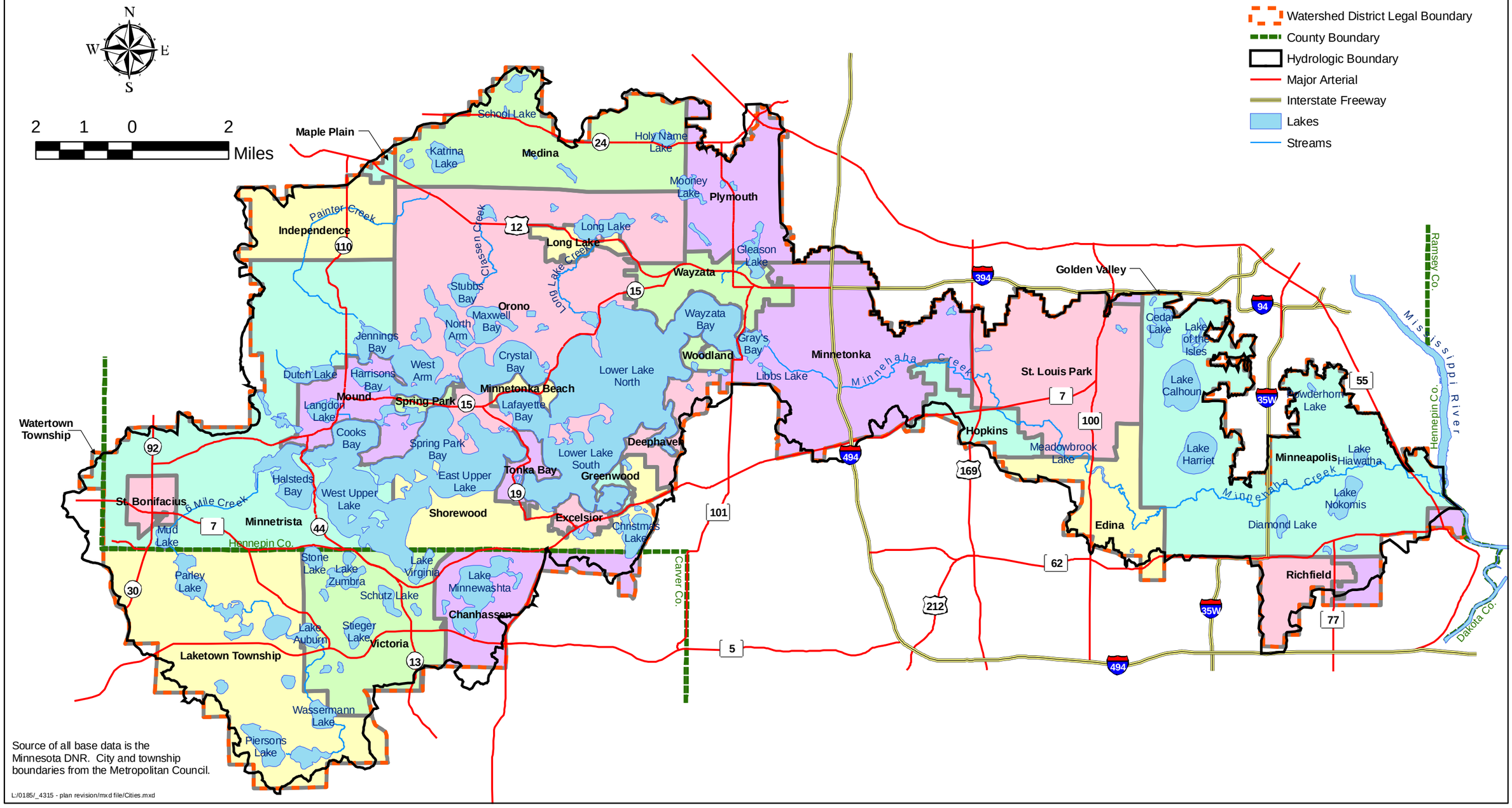
- Proposed Route (Holy Name Dr to Hwy 55)
- Proposed Route (Tamarack Dr to Holy Name Dr)
- Existing Substation
- Substation Site A

Barr Wetland (Clipped to 200ft of Proposed Route)
- Wetland (1) Clipped to 200ft
- Woody Wetland (2) Clipped to 200ft
- FEMA Floodplain (3)
- Met Council 2010 Agricultural Classification (4)
- MnDNR GAP Forest Classification (5)

Approximate Existing GRE Line BD Pole Location*
- Pole in Wetland(1)
- Pole in FEMA Floodplain(3)
- Pole in Wetland(1) and FEMA Floodplain(3)
- Pole in Woody Wetland(2) and FEMA Floodplain(3)
- Pole in Agricultural Cropland(4)
- Pole in Agricultural Cropland(4) and FEMA Floodplain(3)

* All pole locations are approximate.
(1) Barr Eng., Cowardin Types PEMC, PEMC/EMB, PUBG, PEMB
(2) Barr Eng., Cowardin Types PEMC/SSB, PEM/SSB
(3) FEMA Q3 Data, 2003
(4) Met Council Land Use, 2010
(5) MnDNR GAP Land Gover Data, 1991-1993

APPROXIMATE POLE PLACEMENT IN RELATION TO WETLANDS, FLOODPLAINS, MATURE TREES, AND AGRICULTURAL CROP LANDS
Hollydale Project



Source of all base data is the Minnesota DNR. City and township boundaries from the Metropolitan Council.

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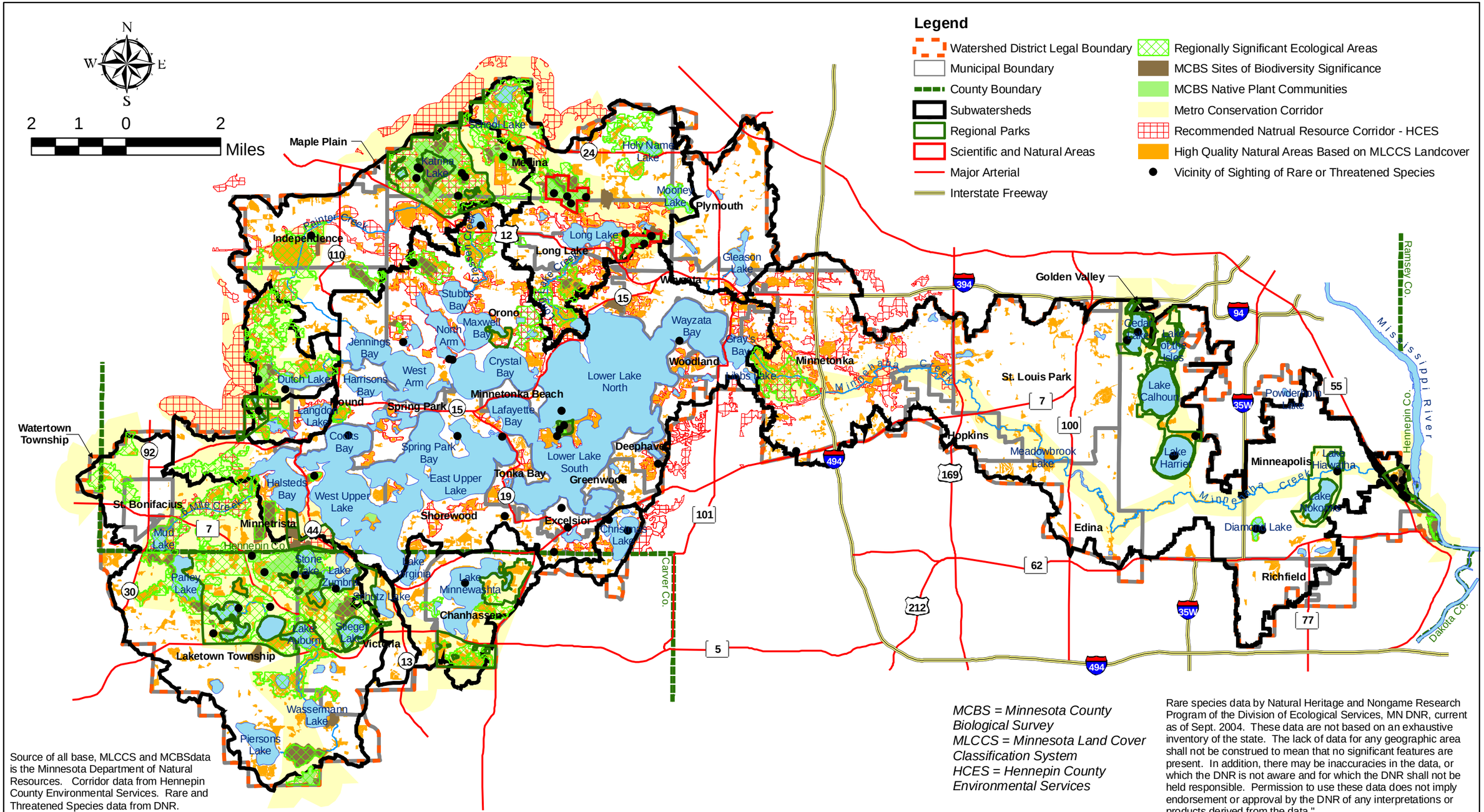
MINNEHAHA CREEK WATERSHED DISTRICT	Minnehaha Creek Watershed District	JAN 2006
Minnehaha Creek Watershed District		Figure 1



Source of all base, MLCCS and MCBSdata is the Minnesota Department of Natural Resources. Corridor data from Hennepin County Environmental Services. Rare and Threatened Species data from DNR.

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MCBS = Minnesota County Biological Survey
MLCCS = Minnesota Land Cover Classification System
HCES = Hennepin County Environmental Services

Rare species data by Natural Heritage and Nongame Research Program of the Division of Ecological Services, MN DNR, current as of Sept. 2004. These data are not based on an exhaustive inventory of the state. The lack of data for any geographic area shall not be construed to mean that no significant features are present. In addition, there may be inaccuracies in the data, or which the DNR is not aware and for which the DNR shall not be held responsible. Permission to use these data does not imply endorsement or approval by the DNR of any interpretations or products derived from the data."

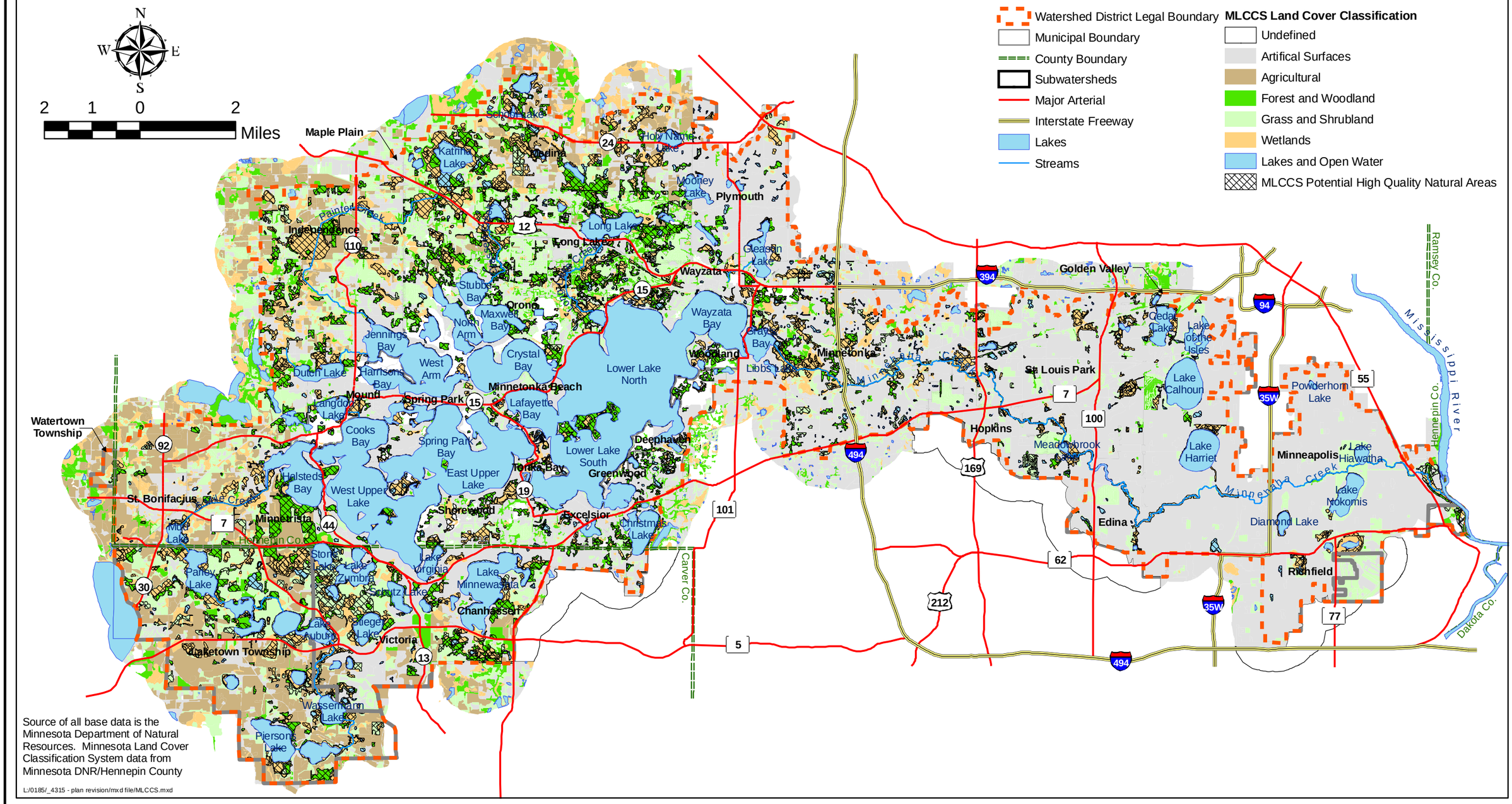
MINNEHAHA CREEK WATERSHED DISTRICT

High Quality Natural Areas in the Minnehaha Creek Watershed

Minnehaha Creek Watershed District

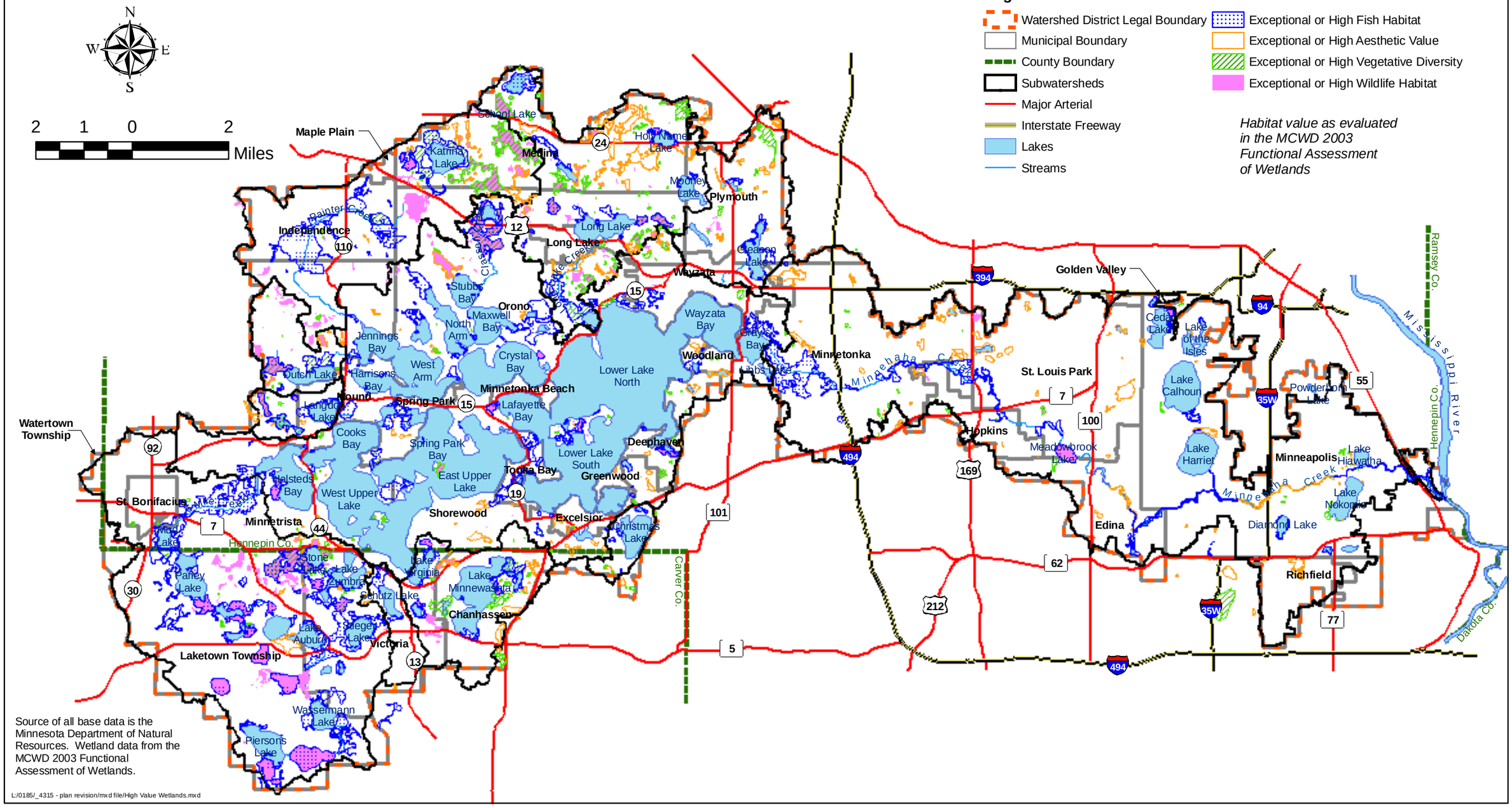
JAN 2006

Figure 9



MINNEHAHA CREEK WATERSHED DISTRICT	JAN 2006
Minnesota Land Cover Classification System: Land Cover Types in the Minnehaha Creek Watershed	Figure 11b

Minnehaha Creek Watershed District



MINNEHAHA CREEK WATERSHED DISTRICT	Minnehaha Creek Watershed District	JAN 2006
Wetlands Evaluated in the Functional Assessment of Wetlands, by High Habitat Value		Figure 28