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March 22, 2013

VIA E-FILING

William C. Storm
State Planning Director
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: Minnesota Power 39 Line Project – St Louis County, Minnesota, Docket No. E015/TL-12-1123
Alternatives Proposed and Comments Received During the Environmental Assessment Scoping
Comment Period

Dear Mr. Storm,

On February 25, 2013, the State of Minnesota Energy Facility Permitting (EFP) staff conducted an Environmental Assessment (EA) public scoping meeting for the proposed Minnesota Power, 39 Line Project located in St. Louis County, MN (Docket No. E015/TL-12-1123). Minnesota Power is taking this opportunity to address alternative route suggestions and public comments provided to EFP staff during the EA scoping comment period.

Minnesota Department of Natural Resources

Comments were provided by the Minnesota Department of Natural Resources (DNR) via a letter dated March 11, 2013, requesting analysis of a route alternative that follows existing corridors. In this case, it is assumed that the DNR is referring to following Highway 101.

Minnesota Power considered following Highway 101 to the project's intersecting point with the 37 Line. Based on desktop analysis and field reconnaissance of the area, it was determined that locating the transmission line along Highway 101 in this area would result in significantly greater forested wetland impacts than the proposed alignment. If Highway 101 were followed, 3.29 acres of wetlands would be impacted versus the proposed route's 1.11 acres of wetland impacts for the proposed transmission line location. Further, Minnesota Power determined that following Highway 101 to the 37 Line would result in greater construction costs and would need to be located in close proximity to an occupied residence located at the intersection of Minnesota Power's 37 Line and County Road 101 (see attached Figure 1). For these reasons, Minnesota Power did not propose a route following Highway 101 to the 37 Line in its Route Permit application.

The same letter provided by the DNR dated March 11, 2013 outlined vegetation management concerns. Minnesota Power performs what is called Necked Down vegetation clearing on transmission line rights-of-way (ROW). The areas directly under the conductors and structures are cleared to ground level. Tree or tall shrub species that have the potential to interfere with the operation of the transmission line are removed from the ROW. The remaining ROW retains existing shrub and brush species that do not have the potential to interfere with the operation of the transmission line.

The same letter from the DNR Dated March 11, 2013, refers to an email sent By Mr. Joe Rokala (MN DNR Land and Minerals) on March 1, 2013, that outlines the DNR's conditions to Minnesota Power for crossing State land located in Section 36-Township 58N-Range 18W (see Figure 1).

In its March 1, 2013 email, the DNR stated that it would consider allowing monopole structures within the existing Highway 101 road easement ROW. Minnesota Power has met with St. Louis County in regards to placing transmission line structures within Highway 101 ROW and the county requires all transmission line structures to be placed at least 42 feet from road centerline. The majority of the highway ROW for that portion of Highway 101 is 75 feet wide and a small portion is 45 feet wide. As a result, Minnesota Power intends to place all structures within Highway 101 ROW. Any additional ROW that Minnesota Power will need to acquire from the DNR, for the 39 Line Project, will be less than 50 feet.

Minnesota Department of Transportation

Comments were provided by the Minnesota Department of Transportation (MN DOT) via letter dated on March 11, 2013 which outlines construction or structures within MN DOT ROW. The 39 Line route proposed in the Route Permit application does not include any MN DOT ROW. If the project changes and MN DOT ROW is included, Minnesota Power will notify MN DOT.

St. Louis County

Comments were provided via an email from Mr. Gary C. Kuyava, St. Louis County Agriculture Inspector, dated February 6, 2013 which identify concerns related to the movement of noxious weeds such as Tansy, Canada Thistle and Spotted Knap Weed. A very small amount of soil disturbance is anticipated for construction of this project. All soil will remain on the project site and any aggregate required for construction will come from aggregate pits that are cleared of noxious weeds before material is moved. When areas are revegetated after construction, seed will be used that is noxious weed free.

If you have any questions or concerns please contact me at 218-355-3515. Thank you for your attention in this matter.

Sincerely



Daniel McCourtney
Minnesota Power
Siting and Permitting

Enc.