Minnesota Department of Natural Resources
500 Lafayette Road • St. Paul, MN • 55155-40_

March 11, 2013

Bill Storm, Environmental Manager
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Re: Minnesota Power 39 Line 115 kV Transmission Line Project Route Permit Application and Environmental Assessment Scoping [PUC Docket Number: E015/TL-12-1123]

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application and the Environmental Assessment (EA) Draft Scoping Document for the Minnesota Power 39 Line 115 kV Transmission Line Project and provides the following comments:

Routing and Construction Plans

The route depicted in the Route Permit Application includes cross-country portions that do not appear to follow an existing corridor. Considering the location of wooded areas and land labeled as "mine dump" in application figures, it is possible that the proposed route is the most practical route with the least environmental impact. However, routing along existing corridors should also be analyzed to help agencies and the public understand a comparison of impacts.

Mitigation measures discussed in the Route Permit Application for work in wetlands include using construction matting to reduce impacts. Winter construction should also be considered for work in wetlands and in forested areas. Winter construction may be required if a License to Cross Public Lands and Waters is required for an area.

The Route Permit Application includes a statement that bird diverters are not proposed for this project. The DNR plans to further assess the project area with input from the DNR Area Wildlife Manager regarding bird diverters.

Vegetation Management and Restoration

Page 5-5 includes a discussion of using erosion control methods other than plastic mesh to avoid impacts to reptiles and birds. The DNR supports the use of wildlife-friendly erosion control. A flyer is attached with additional detail regarding wildlife-friendly erosion control.

Vegetation Management – The EA should discuss vegetation management and maintenance. The DNR encourages selective vegetation management practices. Brush and trees, other than invasive species, that grow to a height that does not conflict with the reliable and safe operation of the transmission line should remain in the Right-of-Way.

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Invasive species are discussed in the Route Permit Application. There should also be an invasive species section in the EA. Some resources for planning invasive species Best Management Practices are available at the following DNR webpages:

http://www.dnr.state.mn.us/invasives/locations.html

http://www.dnr.state.mn.us/invasives/dnrlands.html

There is also a "Field Worker" section on the following webpage:
http://www.playcleango.org/takeaction.html

The following webpage includes applicable Best Management Practices for Transmission and Utility Corridors in Wisconsin:
http://council.wisconsinforestry.org/invasives/transportation/

The EA should clarify whether poles, or portions of poles, will be removed or left in place in the section of the transmission line that will be removed. If they are left in place, there should be a discussion of the possible length of time they would be in place prior to the area being mined and any natural resource impacts.

Minerals and Public Land and Water Crossings

The Route Permit Application states that 17% of the land the line would cross is public land administered by the DNR. The EA should include additional discussion regarding public land crossings.

The project developer has begun coordination with the DNR Lands and Minerals Division regarding crossing School Trust Land administered by the DNR and associated taconite resources. The DNR sent the enclosed e-mail and excerpts from a road easement document regarding possible conditions for the License to Cross Public Lands and Waters in this area. The project developer and/or EA author should continue to coordinate with the DNR Division of Lands and Minerals Regional Supervisor for this area, Joe Rokala at 218-999-7894 and include or copy Regional Environmental Assessment Ecologist (REAE) Rian Reed at 218-999-7826 regarding any potential state-owned minerals and state-owned land in the area.

Sincerely,

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

Enclosure: 3

C: Tricia DeBleeckere, Public Utilities Commission
Steve Kniefel, St. Louis County
David R. Moeller, Minnesota Power