Minnesota Department of Natural Resources
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August 2, 2013

Ray Kirsch, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

Re: Route Permit Application for the Minnesota-Iowa 345 kV Transmission Line Project in Jackson, Martin, and Faribault Counties, Minnesota
PUC Docket Number: ET-6675/TL-12-1337
DNR ERDB Number: 20130139

Dear Mr. Kirsch:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application for the ITC Midwest LLC Minnesota to Iowa Transmission Line Project. The following comments are submitted regarding the Route Permit Application and regarding scoping for the Environmental Impact Statement (EIS). Additional routes are suggested as part of the scope of comparative analysis in the EIS. However, generally, the DNR is not recommending one route instead of another at this time, prior to reviewing a comparative analysis of environmental effects of routing options.

Appendix D – Route A Map Jackson County Sheet 3

The DNR recommends analyzing an alignment the farthest possible to the east in Section 3, Township 102N, Range 35W near the Des Moines River by expanding the route width to the east. Also, the EIS should analyze possible avian impacts and mitigation measures, clearing impacts and mitigation measures, and include the reasoning behind using a parallel route to the river instead of a perpendicular route. Any constraints in the area should be depicted on a map.

Appendix D – Route A Map Martin County Sheet 3

The DNR has received a report of a possible eagle nest located in Section 5, Township 102N, Range 32 W. Information was sent to the Department of Commerce and project proposer. The project proposer should coordinate with the United States Fish and Wildlife Service and any possible impacts should be discussed in the EIS.

Appendix D – Route A Map Martin County Sheets 6 and 7

The DNR is concerned about possible future impacts to a potential wetland restoration area along Route A in Section 23, Township 103N, Range 32W shown on Map Martin County Sheet 6. A connector route between Routes A and B in this area would provide for more combinations of routes for analysis in the EIS, and possibly a greater ability to avoid environmental impacts. The EIS should include analysis of a route connecting Routes A and B along 130th Ave, running

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north and south and shown on Maps Martin County Sheet 6 and 7. To see the entire area of the possible connector route, also see Appendix C, Martin County Sheet 1 along the line between Range 32W and Range 31W in the northeast portion of the map running north/south between Route A and B. Other connection option ideas may also be practical in this area.

Appendix D – Route A Map Faribault County Sheet 3

The EIS should compare the impacts of leaving the line in place or moving it to the western portion of the alignment farther away from the Blue Earth River corridor and restoring the area closer to the river in Section 23, Township 103N, Range 28W. This would reduce the number or Blue Earth River crossings in this area from two crossings to a single crossing. Increasing the width of the route analyzed would also allow for the assessment of moving the line farther from paralleling a river.

Also, please clarify in the EIS whether the existing line crossing the Blue Earth River would be removed if Route B were constructed.

Appendix D – Route B Jackson County Sheet 2

Route B appears to cross a portion of Toe WMA. Note that federal funding is associated with this WMA, which may result the need for federal approval for a License to Cross Public Lands and Waters.

Appendix D – Route B Martin County Sheet 2

Route B crosses the southern portion of Caron WMA. Note that federal funding is associated with this WMA, which may result in the need for federal approval for a License to Cross Public Lands and Waters.

Appendix D – Route B Map Martin County Sheet 3 and Appendix C – Martin County Sheet 1

The DNR is concerned that Route B crosses through Four Corners Wildlife Management Area (WMA) and is adjacent to a State Game Refuge. The area includes wetlands and wildlife habitat. Impacts may include increased avian collision risk, and direct habitat and recreational use impacts to the WMA. Also, federal funding is associated with the Four Corners WMA, which may result in the need for federal approval of a License to Cross Public Lands and Waters.

This area may be avoided with a connector route between Route A and B. There is a connector route shown in the application west of the WMA. However, this route is concerning due to the presence of wetlands, Conservation Reserve Program (CRP) land, and its proximity to the Four Corners WMA, Fox Lake, and the State Game Refuge. The habitat features and concentration of waterfowl in this area are likely to increase avian collision risk. The EIS should include an additional connector route for comparative analysis aligned north/south along 40th Avenue as depicted in Appendix D, Route B Map, Martin County, Sheet 2 and continuing south to connect with Route A.

Appendix D – Route B Map Martin County Sheet 11

Center Creek WMA is a new WMA located in Sections 20 and 21 of Township 103N, Range, 29W (see attached map). This WMA should be added to maps in the EIS. A "greenfield" crossing of Center Creek WMA is proposed along Route B without following any existing infrastructure. The WMA includes wetland, grassland, and forested habitat, and a large Minnesota Biological Survey (MBS) site of Moderate Biodiversity Significance. Also an MBS site of Outstanding Biodiversity Significance is located near the WMA.

Recently, as a result of substantial effort and resources, the DNR acquired Center Creek WMA as a public use area. The Center Creek WMA should be avoided. Licensing an alignment south and parallel to a portion of the WMA access road to Center Creek WMA may be reasonable provided adequate vehicle access to the WMA is coordinated with and approved by the DNR. However, considering avoidance opportunities exist, the DNR is unlikely to issue a license to cross the main portion of the WMA. An alternative route, or routes, for analysis in the EIS are suggested aligned north/south in the area between 265th Avenue and the section line between Section 20 and 21, approximately in the southeast quarter section of Section 20, Township 103N, Range 29W. However, the DNR does not recommend a route near the section line between Section 20 and 21 that would be adjacent to the WMA. A route adjacent to the WMA may reduce habitat use, recreational opportunities, and may limit future wetland restoration or WMA acquisitions.

Also, widening the route in this area to address the above concerns is not recommended, as it would still allow the option of routing within the WMA if Route B were to be permitted. A new route option, as described above, or multiple other route options, should be created separate from the currently proposed location and width of Route B for analysis in the EIS.

Appendix C – Martin County Sheet 2

There was interest from those attending a recent public scoping meeting for this project to follow Route A across Lake Charlotte, along an existing 161 kV line, instead of joining Route A with Route B as depicted in this Appendix C – Martin County Sheet 2. The DNR is interested in EIS analysis of three options: following the existing 161kV Line across Lake Charlotte; following the proposed route avoiding Lake Charlotte, depicted as Route A/B on this map sheet; and also following the proposed Route A/B and removing lines from Lake Charlotte completely and co-locating those lines on the proposed route. The analysis for using the existing Lake Charlotte crossing should be developed with no poles located within the public water.

Bird Diverters

Please include a discussion in the EIS of the criteria the project developer proposes for choosing bird diverter locations. For a project of this size, submitting detailed bird diverter locations for the permitted route as a compliance filing may be more efficient than including locations for every route analyzed in the EIS. Also, the DNR License to Cross Public Lands and Waters may require bird diverters.

Thank you for the opportunity to provide input regarding the Route Permit Application and scope of the EIS for the Minnesota to Iowa Transmission Line. Please contact me with any questions.

Sincerely,

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

Enclosures: 1

C: Scott Ek, Minnesota Public Utilities Commission
Lori Broghammer, ITC Midwest

Center Creek WMA
RIM
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134