

From: [Rich Libbey](#)
To: [Storm, Bill \(COMM\)](#)
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Date: Friday, August 15, 2014 4:29:56 PM

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

RE: In the Matter of the Application of Minnesota Power for a Route Permit for the Great Northern High-Voltage Transmission Line Project from Manitoba, Canada- Minnesota Border to the Blackberry Substation near Grand Rapids, Minnesota
PUC Docket No. E-015/TL-14-21

Dear Mr. Bill Storm

I would like to submit some comments on minimizing the construction impacts of the GNTL.

When clearing the power line corridor I would like to see minimum soil disturbance. Clearing when the ground is frozen would accomplish this if it is practical. Will the tree stumps and roots be removed from the ground causing soil disturbance and a breeding ground for invasive species or will they be sheared off at ground level and treated with herbicides-or a combination of both? Clearing the line during nesting season in the spring will cause unnecessary bird mortality to both tree and ground nesters. How will the woody debris be handled. Will it be chipped, burned in Brush piles, used for bio mass, be stock piled in brush piles to naturally decay and provide habitat for brush pile dependent animals, or scattered about. I would think burning of brush piles should be avoided due to CO2 and particulate emissions. In Sweden brush bailers are used to make woody bales suitable for bio mass.

Log mats used in crossing wetlands need to be cleaned on site before moving to reduce transport of invasive seeds and earthworms.

The route needs to be surveyed for plants and animals of special concern including the Goshawk.

A separate issue I feel should be addressed is substation security at the Blackberry sub. An attack occurred on a substation in California a few years back and it was out of service for months. The attackers used assault rifles. The substation should at least be shielded from view or have video surveillance. It can take up to a year to replace a destroyed transformer. Will backups be available?

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