

Written Public Comments Received on the  
Scope of the Environmental Assessment for the  
Motley Area 115 kV Transmission Line Project  
Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204

**Agencies**

- (1) Minnesota Pollution Control Agency
- (2) Minnesota Department of Natural Resources
- (3) U.S. Fish and Wildlife Service

**Citizens**

- (1) Geraldine Paulacky
- (2) Ted Sullivan
- (3) Donald Milless
- (4) Kim Carlson
- (5) Ralph Birkholtz
- (6) Patrick and Laurie Humphrey
- (7) Patrick and Laurie Humphrey
- (8) Patrick and Laurie Humphrey
- (9) Patrick and Laurie Humphrey
- (10) Daniel Donahue
- (11) Brad and Lavonne VanVickle
- (12) Adam Loberg
- (13) Adam Loberg
- (14) Donald Milless
- (15) Greg Frisk
- (16) John Ringle and Teresa (Rassler) Ringle
- (17) Patrick and Laurie Humphrey



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us) | Equal Opportunity Employer

June 3, 2015

Mr. Richard Davis  
Minnesota Department of Commerce  
85<sup>th</sup> 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

RE: Motley Area 115 kV Transmission Line Project, Minnesota Public Utilities Commission  
Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204

Dear Mr. Davis:

Thank you for the opportunity to review and comment on the “Application to the Minnesota Public Utilities Commission for a Certificate of Need and Route Permit” (the Application) prepared by Great River Energy and Minnesota Power (the Applicants) for the Motley Area kV Transmission Line Project (the Project) in the above dockets. The Project, located close to the City of Motley, involves construction of approximately 15.5 to 16.5 miles of 115 kilovolt (kV) transmission lines and association facilities in Morrison, Cass and Todd counties. The Project proposes to address transmission system overload issues in the Motley area and to serve a new pump station proposed by the Minnesota Pipe Line Company.

The Minnesota Pollution Control Agency (MPCA) has the following comments on this Project:

## Section 2.5.2

Since the Project, including staging areas, will disturb one acre or more of land, the Applicants must obtain a National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater Permit from the MPCA. It is possible that the Project is subject to a 50 acre review. On page 9-36, the Applicants state that no impaired waters will be crossed by the project. However, the NPDES/SDS Construction Stormwater General Permit requires that a project disturbing over 50 acres that falls within one mile of and drains to a special or impaired water, will require a Stormwater Pollution Prevention Plan review and approval by MPCA staff at least 30 days prior to applying for permit coverage under the NPDES/SDS Construction Stormwater General Permit. Also, the Application does not have sufficient detail concerning Best Management Practices (BMPs) that will be used to minimize impacts to wetlands. Information regarding the MPCA’s Construction Stormwater Program is found on the MPCA’s website at:

<http://www.pca.state.mn.us/water/stormwater/stormwater-c.html>.

#### Section 8.4

Please note that if the Applicants encounter contaminated soil or groundwater during construction, state law requires that the Applicants properly manage all contaminated soil and groundwater they uncover or disturb, even if the Applicants are not responsible for the contamination. If contamination is encountered, Applicants must immediately report to the Minnesota State Duty Officer at 651-649-5451 or 800-422-0798.

#### Section 9.2.3

When determining possible noise levels at substation locations, please also include noise from the proposed pump station. Maps throughout the Application seem to indicate that the Fish Trap pump stations and substations are going to be located in the same area. The Fish Trap substation and the Fish Trap pump station together will create considerable more noise than what is described in the Application, which considers the substation alone. Noise levels could impact wildlife, vegetation, and human quality of life near these areas. (See study entitled "*Noise pollution alters ecological services: enhanced pollination and disrupted seed dispersal*")-

<http://rspb.royalsocietypublishing.org/content/early/2012/03/15/rspb.2012.0230.short?rss=1>

#### Section 9.6.2

Table 9-9 – The MPCA recommends considering Project alternatives that cross fewer large expanses of wetland areas. For example, areas that require frozen winter conditions for construction are very difficult to access in the summer time if maintenance is required.

At the top of page 9-38, the Applicants state that "appropriate erosion and sediment controls will be implemented to avoid or minimize" sedimentation impacts to surface waters. It is MPCA's experience that planning and implementing erosion and sediment control on linear power line projects is challenging because of difficult terrains, uncertainty about what areas are to be disturbed, accessibility, and the sheer length of the project, which makes repeated installation, maintenance, or replacement of more standard BMPs such as erosion control blankets and silt fences a cumbersome task. Cost also becomes prohibitive under these circumstances. As a result, these types of projects frequently use more creative approaches to erosion and sediment control, such as chipping wood previously cleared from the corridor as ground cover, or placing felled trees across slopes as perimeter control. We recommend that Applicants carefully consider using these or a similar option for erosion and sediment control in difficult locations as the Project develops.

#### Section 9.6.3

On page 9-40, under "Impacts and Mitigation," the Applicants state that "no impacts to native vegetation are anticipated." Vegetative cover types are often dependent on surrounding communities, and there will be permanent removal of trees and widening of existing or new corridors for new sections of power line. Introduced seed mixes and additional sunlight will have an impact on already-established native plants. Formerly shade-tolerant species will give way to species that require full sun, with corresponding changes to vegetative communities in the area. The Project will have impacts to native vegetation will result because of the Project.

Mr. Richard Davis  
Page 3  
Date

Section 9.7

On page 9-43, under "Impacts and Mitigation," the Applicants state that erosion control practices "may include" containing excavated material, protecting exposed soil, and stabilizing restored soil. These are all required under the NPDES/SDS Construction Stormwater General permit, and are not optional.

We appreciate the opportunity to review and provide comments regarding this Project. This letter does not constitute approval by the MPCA of any or all elements of the Project for pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Applicants to secure any required permits and to comply with all requisite permit requirements.

If you have any questions with MPCA's review of the Application, please contact me at 651-757-2465 or by email at [Patrice.jensen@state.mn.us](mailto:Patrice.jensen@state.mn.us).

Sincerely,



Patrice Jensen  
Planner Principal  
Environmental Review Program  
Resource Management and Assistance Division

PJ:ld

cc: Dan Card, MPCA  
Scott Fox, MPCA  
Scott Lucas, MPCA



June 3, 2015

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

Re: In the Matter of the Application of Great River Energy and Minnesota Power for a Route Permit for the Motley Area 115 kV Transmission Line Project in Morrison, Cass and Todd Counties, Minnesota  
Public Utilities Commission (PUC) Docket Numbers: ET-2, E-015/TL-15-204

Dear Mr. Davis:

The Minnesota Department of Natural Resources (DNR) has reviewed the Application for a Route Permit for the Motley Area 115 kV Transmission Line Project in Morrison, Cass, and Todd Counties. Please consider the following comments regarding the application and for scoping the Environmental Assessment (EA).

**General Comments:**

Two Mississippi River crossing options are included and associated with two (2) separate connection points. The EA should describe total impacts associated with each alternative and indicate which alternative is the proposed option. Cumulative total impacts associated with any pre-existing lines should also be described in the EA. For example, co-locating with an existing line crossing would expand the overall maintained right-of-way (ROW).

**Specific Scoping Comments:**

Natural Vegetation

The EA should describe the ecological setting of the project using the Ecological Classification System (ECS) to the Land Type Association level. The MDNR and the U.S. Forest Service developed the ECS for ecological mapping and landscape classification following the National Hierarchical Framework of Ecological Units (Ecomap 1993). ECS mapping enables resource managers to consider ecological patterns for areas as large as North America or as small as a single timber stand and identify areas with similar management opportunities or constraints relative to that scale.

Recently, preliminary Minnesota Biological Survey (MBS) data was provided to the applicant and is described using the Native Plant Community (NPC) classification that integrates with the ECS. This information should be included in the EA.



and Rare" describes conservation concerns for species of greatest conservation need (SGCN) and their *key habitats* within various landscape settings (also characterized using the ECS).

In the interests of consistency and accuracy, Minnesota's SWAP, ECS, NPC descriptions, and preliminary MBS data should all inform the content and assessment provided by the EA.

#### Wildlife/Rare and Unique Natural Features

The EA should attempt to identify potential impacts to all significant fish and wildlife resources (e.g. SGCN) and *key habitats* on or near the site. As previously mentioned, Minnesota's SWAP should be used to provide this information. Descriptions of measures to avoid or minimize adverse impacts to these wildlife resources should also be included in the EA.

#### Public Waters

The EA should describe short and long-term impacts of crossing public waters and what measures would be taken to mitigate such impacts. DNR recommends that neck downs, (modified vegetation management, or reduced tree clearing), in clearing widths as well as preservation and maintenance of woody buffers be adopted as an overall mitigation strategy.

#### Avian Collision Risk

The EA should discuss the effectiveness of the following measures to mitigate potential avian mortality impacts associated with collisions with power lines should:

1. Use of line markers - Periods of inclement weather and foggy conditions associated with lakes, water courses and wetlands increase collision risk and have been known to decrease the effectiveness of line marking devices. The EA should assess the effectiveness of various bird flight diverters in mitigating avian mortality due to collision with HVTL's.
2. Underground construction<sup>i</sup> - The EA should assess the effectiveness of underground construction in mitigating avian mortality due to collision with HVTL's.
3. Pole designs (e.g. H-frame vs. single pole) – Use of an H-frame structure or pole designs that minimize the number of vertical wires should be assessed for practicability. The effectiveness of various pole designs in mitigating bird strikes should be discussed in the EA.

A description of potential impacts (estimates of annual mortality), specific avoidance, minimization, and mitigation measures for the following bird flyway and concentration areas should specifically be included in the EA\*:

- Mississippi River Crossing

*\*If other project alternatives are included in the scope of the EA, a description of the aforementioned mitigation measures should also be included for all public waters, public waters*

*wetlands and adjoining floodplains and/or wetlands. An Avian Mitigation Plan should be developed and included as an avian impact risk mitigation strategy as part of the EA.*

#### Other

The EA should discuss disposal or wasting of the black dirt resulting from the excavation of the tower footings.

The EA should describe the functions provided by the project area wetlands and how impacts associated with pole placement (fill placement and type conversion) and maintenance will change those functions. Specific mitigation proposed by the applicant and/or required by law should also be included in the assessment.

The EA should identify and discuss the impacts associated with additional work areas (e.g. marshaling yards) on or adjacent to the ROW that may be needed for construction, storage, or staging of materials.

#### **DNR Land and Water Crossing Licenses:**

The review and issuance of DNR land and water crossing licenses are coordinated by the Division of Lands and Minerals. The proposed project is located in both the Northwest and Central DNR Regions. The Lands and Minerals Realty Specialist in the NW Region is Pamela Arndt (218-308-2683). Contact Pamela if you have any questions on completing the land or water crossing applications in the NW region. The Central Region Lands and Minerals contact is Maryanna Harstad (651-259-5781).

The project proposer should allow adequate time for review and modification of the license applications after the completion of environmental review. The DNR is requesting the following information in license applications:

1. Length and width of each proposed state land and public water depicted on maps and plan sheets. Each crossing must be identified by legal description to the forty.
2. Clearing activities, construction methods, schedule, and staging of operations including equipment and materials storage proposed on state land or in public waters.
3. Permanent and temporary access points to the proposed ROW affecting state land or public waters.
4. Temporary work areas on state land adjacent to the ROW that may be needed during construction. These areas should be clearly delineated and identified in the application materials.
5. General location of existing utility lines or transportation ROWs within or near the proposed ROW on state land or in public waters.
6. State trails or Grant in Aid trails proposed to be crossed.

7. Location and design of tower structures including proposed methods for disposal or wasting of the black dirt resulting from the excavation of the tower footings.
8. Restoration methods including proposed seed mixes and invasive species control measures.
9. ROW maintenance methods and schedule on state land or in public waters.

In addition, the project proposer should be aware of the following points related to the licensing of state land and public water crossings:

1. DNR invasive species standards will apply to state-administered lands and public waters to include cleaning of equipment.
2. Certain pesticides are restricted from use on certified forest lands. Adequate notice of herbicide or pesticide use on state lands will be required and only approved herbicides will be allowed.
3. Use of native species for re-vegetation and clean weed-free straw for mulch will be required on certain state land and public water crossings.
4. In-stream work on certain public waters (trout streams, for example) must be avoided at prescribed times to accommodate fish spawning.
5. State lands purchased with the assistance of various federal grant programs may require mandatory federal aid review and approval before the license can be issued. Supplemental information may be required for the federal review. If federal approval is required, additional time will be needed to process the application.
6. If a state land parcel becomes isolated due the construction of the ROW, the project proposer must provide access to the isolated state land across the ROW.
7. A monitoring fee will be assessed for DNR projected reasonable costs for monitoring the construction of the utility line and preparing special terms and conditions of the license to ensure proper construction.
8. Permission for temporary access to the ROW across state land is considered a separate transaction and may be granted through a lease. Requests for temporary access are subject to review and approval, and in some cases may not be granted. Allow adequate time for processing access lease requests.

### **Rare and Unique Natural Resources:**

Resources and concerns identified in the enclosed March 30, 2015 DNR Natural Heritage letter should be included in the EA. Also, corrections to the Fauna and Rare and Unique Natural Resources sections of the Route Permit Application will be sent to the Department of Commerce in a Track Changes format. They include updates to species' status (e.g. Bald Eagle – state listed

NON, Northern Long Eared Bat – federally listed Threatened, American Bittern – state listed (NON), information updates from the NHIS letter in Table 9-10, and other minor changes.

Thank you for the opportunity to review the Route Permit Application for the Motley Area 115 kV Transmission Line Project. Please contact me with any questions.

Sincerely,



Kate Frantz  
Environmental Review Planning Director

Enclosure: 1

cc: Tricia DeBleekere, Public Utilities Commission  
Rick Heuring, Great River Energy

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<sup>1</sup>6135.1200 STANDARDS FOR STRUCTURE DESIGN.

Subpart 1. Location of utility. With regard to locating the utility overhead or under the ground or water:

A. Primary consideration shall be given to underground and underwater placement in order to minimize visual impact. If the proposal is for overhead placement, the applicant shall explain the economic, technological, or land characteristic factors, which make underground placement infeasible. Economic considerations alone shall not be the major determinant. Statutory Authority: *MS s 84.415 Posted: June 11, 2008*



# Minnesota Department of Natural Resources

Division of Ecological and Water Resources, Box 25

500 Lafayette Road

St. Paul, Minnesota 55155-4025

Phone: (651) 259-5091 E-mail: samantha.bump@state.mn.us

March 30, 2015

**Correspondence # ERDB 20150259**

Mr. Mark Strohfus  
Great River Energy  
12300 Elm Creek Boulevard  
Maple Grove, MN 55369-4718

RE: Natural Heritage Review of the proposed Motley Area 115 kV,

County	Township (N)	Range (W)	Section(s)
Cass	134	32	26, 27, 34, 35
Cass/Morrison	133	31	2-4, 9-11, 14-16, 19-23, 26-31
Morrison	132	31	6, 7, 18, 19, 30, 31
Todd	132	32	25, 36

Dear Mr. Strohfus,

As requested, the Minnesota Natural Heritage Information System has been queried to determine if any rare species or other significant natural features are known to occur within an approximate one-mile radius of the proposed project. Based on this query, rare features have been documented within the search area (for details, see the enclosed database reports; please visit the Rare Species Guide at <http://www.dnr.state.mn.us/rsg/index.html> for more information on the biology, habitat use, and conservation measures of these rare species). Please note that the following **rare features may be adversely affected** by the proposed project:

- Blanding’s turtles (*Emydoidea blandingii*), a state-listed threatened species, have been reported from the vicinity of the proposed project. Blanding’s turtles use upland areas up to and over a mile distant from wetlands, as well as wetlands. Uplands are used for nesting, basking, periods of dormancy, and traveling between wetlands. Because of the tendency to travel long distances over land, Blanding’s turtles regularly travel across roads and are therefore susceptible to collisions with vehicles. Any added mortality can be detrimental to populations of Blanding’s turtles, as these turtles have a low reproduction rate that depends upon a high survival rate to maintain population levels. Other factors believed to contribute to the decline of this species include wetland drainage and degradation, and the development of upland habitat.

For your information, I have attached a Blanding’s turtle fact sheet that describes the habitat use and life history of this species. The fact sheet also provides two lists of recommendations for avoiding and minimizing impacts to this rare turtle. **Please refer to the first list of recommendations for your project.** In addition, if erosion control mesh will be used, the DNR recommends that the mesh be limited to wildlife-friendly materials (see enclosed fact sheet). If greater protection for turtles is desired, the second list of additional recommendations can also be implemented.

The attached flyer should be given to all contractors working in the area. If Blanding’s

turtles are encountered on site, please remember that state law and rules prohibit the destruction of threatened or endangered species, except under certain prescribed conditions. If turtles are in imminent danger they should be moved by hand out of harm's way, otherwise they should be left undisturbed.

- The Minnesota Biological Survey (MBS) has identified several Sites of Biodiversity Significance adjacent to the proposed project (see attached map). Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape (GIS shapefiles of MBS Sites of Biodiversity Significance and MNDNR Native Plant Communities can be downloaded from the MN Geospatial Commons a <https://gisdata.mn.gov/>). Within these Sites, the proposed transmission line crosses the following native plant communities: Basswood – Black Ash Forest, Central Dry-Mesic Oak-Aspen Forest, Meadow-Shrub Swamp – Marsh – Wet – Mesic Hardwood, and Sedge Meadow.

Given that activities in road rights-of-way can negatively affect adjacent native plant communities, especially through the introduction of invasive plant species, disturbance near these ecologically significant areas should be minimized. Actions to minimize disturbance may include, but are not limited to, the following recommendations:

- Confine construction activities to the opposite side of the road from the Native Plant Communities and Sites of Biodiversity. If this is not feasible, confine construction activities to the existing road rights-of-way;
  - As much as possible, operate within already-disturbed areas;
  - Minimize vehicular disturbance in the area (allow only vehicles necessary for the proposed work);
  - Do not park equipment or stockpile supplies in the area;
  - Do not place spoil within MBS Sites or other sensitive areas;
  - Inspect and clean all equipment prior to bringing it to the site to prevent the introduction and spread of invasive species;
  - If possible, conduct the work under frozen ground conditions;
  - Use effective erosion prevention and sediment control measures;
  - Revegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible; and
  - Use only weed-free mulches, topsoils, and seed mixes. Of particular concern are birdsfoot trefoil (*Lotus corniculatus*) and crown vetch (*Coronilla varia*), two invasive species that are sold commercially and are problematic in prairies and disturbed open areas, such as roadsides.
- Several rare mussels, including the creek heelsplitter (*Lasmigona compressa*) and the black sandshell (*Ligumia recta*), both state-listed species of special concern, have been documented in the Crow Wing River just downstream of the transmission line crossings. Mussels are particularly vulnerable to deterioration in water quality, especially increased siltation. As such, it is important that sound erosion and sediment control practices be implemented and maintained near the river crossing. To further protect the mussels and

other aquatic resources, we recommend spanning the river with an overhead line or directional boring with an underground line.

- Please include a copy of this letter in any DNR license or permit application.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. However, the NHIS is not an exhaustive inventory and thus does not represent all of the occurrences of rare features within the state. Therefore, ecologically significant features for which we have no records may exist within the project area. **If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.**

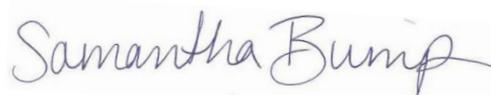
The enclosed results include an Index Report of records in the Rare Features Database, the main database of the NHIS. To control the release of specific location data, the report is copyrighted and only provides rare features locations to the nearest section. The Index Report may be reprinted, unaltered, in any environmental review document (e.g., EAW or EIS), municipal natural resource plan, or report compiled by your company for the project listed above. If you wish to reproduce the Index Report for any other purpose, please contact me to request written permission.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location (noted above) and the project description provided on the NHIS Data Request Form. Please contact me if project details change or for an updated review if construction has not occurred within one year.

The Natural Heritage Review does not constitute review or approval by the Department of Natural Resources as a whole. Instead, it identifies issues regarding known occurrences of rare features and potential effects to these rare features. To determine whether there are other natural resource concerns associated with the proposed project, please contact your DNR Regional Environmental Assessment Ecologist (contact information available at [http://www.dnr.state.mn.us/eco/ereview/erp\\_regioncontacts.html](http://www.dnr.state.mn.us/eco/ereview/erp_regioncontacts.html)). Please be aware that additional site assessments or review may be required.

Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources. An invoice will be mailed to you under separate cover.

Sincerely,



Samantha Bump  
Natural Heritage Review Specialist

enc. Rare Features Database: Index Report  
Blanding's Turtle Fact Sheet & Flyer  
Wildlife Friendly Erosion Control  
Map

Links: MBS Sites of Biodiversity Significance  
[http://www.dnr.state.mn.us/eco/mcbs/biodiversity\\_guidelines.html](http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html)  
DNR Native Plant Communities  
<http://www.dnr.state.mn.us/npc/index.html>

cc: Nathan Kestner  
Brooke Haworth  
Darrin Hoverson  
Ken Zeik

**From:** [Horton, Andrew](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** RE: Motley Area 115kV Project.  
**Date:** Wednesday, June 03, 2015 5:06:56 PM

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Mr. Davis,

Unfortunately due to staffing limitations and the close of the comment period, I am unable to more fully address our comments regarding the Motley Area 115kV Project. There are, however, a couple of points that should be clarified that will aid in making accurate species determinations during the development of this Environmental Assessment.

Page 9-40 incorrectly states that, "The recent northern long-eared listing proposal by the U. S. FWS proposes tree clearing restrictions only from June 1 to July 31, rather than the longer restriction period of April 1 to September 30." The intent of the interim 4(d) rule (Rule) that was issued at the time of listing the species, was that any incidental "take" (defined as harass, harm, pursue, hunt, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct) that may result from certain activities identified in the Rule and meet the conservation measures, would be exempt from an Incidental Take Statement. For federal actions, even if those activities meet what is defined in the Rule and follow the conservation measures, consultation with the Service still needs to be conducted if the project may affect the species. If there is tree clearing that removes suitable roosting habitat during the summer maternity season (April 1 to September 30) and is not occurring in an area that can be determined to be unoccupied, take may occur. To avoid direct effects to the species, the Service recommends removing suitable summer roosting habitat for the northern long-eared bat outside of April 1 to September 30.

If the Motley Area project does not involve federal funding or require a federal permit and the activities proposed meet what is defined in the Rule, all Take is exempted and involvement with the Service would not be necessary to comply with the Endangered Species Act. One activity that is listed in the Rule and may apply to this project, is the Maintenance and Limited Expansion of Existing Rights-of-Way (ROW) and Transmission Corridors. In order to meet this classification, the expansion of a corridor or ROW must be within 100 feet from the edge of an existing cleared corridor or ROW. Page 4-8 states that for most segments of the new transmission in, a 100-foot wide permanent ROW will be acquired. It would be useful to know if there will be any situations where the 100-foot ROW would be exceeded or if any portion of the line creates a new corridor away from the existing ROW.

Thank you for the opportunity to comment.

Andrew Horton  
Twin Cities Ecological Services Field Office  
U.S. Fish and Wildlife Service  
4101 American Blvd East  
Bloomington, MN 55425-1665  
(612) 725-3548 ext. 2208

Please provide your contact information. This information and your comments will be publically available.

Name: Geraldine Paulackey Phone: \_\_\_\_\_

Street Address: 5164 St. Hwy 210 SW

City: Pillager State: MN ZIP: 56473

Email: \_\_\_\_\_

**Please share your comments on the proposed Motley Area 115 kV Transmission Line Project.**

- What human and environmental impacts of the proposed transmission line should be studied in the environmental assessment (EA) prepared for this project?
- Are there any specific methods to address (mitigate) these impacts that should be studied in the EA?
- Are there any alternative routes or route segments that should be considered to address these impacts?
- Are there other ways to meet the stated need of the proposed project, instead of the proposed transmission line?
- What alternatives to the proposed project should be studied in the EA?

- Concerns regarding the distance of the ROW # along the east alternative being too close to their residence.

- Also concerned about tree removal & view shed issues.

Geraldine Paulackey

Please provide your contact information. This information and your comments will be publically available.

Name: Teed Sullivan Phone: 218-820-8575 cell  
Street Address: 5298 132nd St SW  
City: Pullman MN State: MN ZIP: 56473  
Email: TSBS@Brainerd.net

Please share your comments on the proposed Motley Area 115 kV Transmission Line Project.

- What human and environmental impacts of the proposed transmission line should be studied in the environmental assessment (EA) prepared for this project?
- Are there any specific methods to address (mitigate) these impacts that should be studied in the EA?
- Are there any alternative routes or route segments that should be considered to address these impacts?
- Are there other ways to meet the stated need of the proposed project, instead of the proposed transmission line?
- What alternatives to the proposed project should be studied in the EA?

Stay with West proposal

Huge Loss of View and wildlife Flyway  
Between Ridges.

**From:** [Donald Milless](#)  
**To:** [mstrohfus@greenergy.com](mailto:mstrohfus@greenergy.com); [rheuring@greenergy.com](mailto:rheuring@greenergy.com)  
**Cc:** [Davis, Richard \(COMM\)](#); [staff\\_cao \(PUC\)](#)  
**Subject:** Motley Area 115 KV Project - PUC Docket 14-853 and 15-204  
**Date:** Tuesday, May 19, 2015 5:43:33 PM

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Mr. Strohfus and Mr. Heuring,

RE: PUC Docket 14-853 and 15-204

I would like to meet to discuss the Motley Area 115 KV Project, in particular the West Option and the area where the power lines cross the Crow Wing River, and where the lines cross my nearly half mile of pasture, woods, and pond. I do plan to go to the meeting tomorrow night (5/19) at Motley Staples Middle School Cafeteria. Perhaps we can talk before or after the meeting and set up a time to meet on my property. Otherwise, please call me (W 218-316-3861 or H 218-746-3077) to set up a meeting.

I am very concerned with this very large power line crossing a pristine stretch of the Crow Wing River, and the environmental, aesthetic, and economic affect it will have. I am also concerned with the clear cutting of over a quarter mile of my heavily wooded land, not only the aesthetic and economic loss to me, but also the habitat loss for wildlife. I am also concerned with the affects these large power lines could have on my family's health and the health of my cattle. These are just a few of my primary concerns. Hopefully we can meet soon.

Thank you.  
Don Milless

**From:** [Kim Carlson](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket 14-853 and 15-204  
**Date:** Thursday, May 21, 2015 4:35:53 PM

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I am writing in regards to the new power line proposed by great River energy which is planned to run along state highway 10 south of county road 28. Docket 14-853 and 15-204.

My concerns:

1. Being a home owner on the west side of hwy 10 south of Ridge Rd, I do not understand why the line is planning to cross hwy 10 at 28 and run on the west side of 10. There are already areas cut on the east side of 10 for power lines, why waste more money and trees by crossing 10?
2. Today I drove down hwy 10 and counted "fire numbers" along both sides of 10. The west side has 19 numbers (some sharing driveways based on where the turn lanes are on 10) and the east side only has 5. These are people with ACTUAL highway 10 addresses- not just the backs of their property. There will be 19 angry homeowners as opposed to 5 on the east side. A few of the homes are very close to the highway as well, making the space for the new power line limited.
3. How this will effect property values troubles me. We share a driveway with our neighbors which runs along the front of their property and turns to head up to our house. We currently have protection from the view of the highway due to the trees at the turn in our driveway. If the power line travels on the west side of hwy 10, these trees will be gone leaving us with a view of the highway. We purchased our house in 2014, we paid for a house with out a view of the highway. If we try to sell after those trees are gone, giving us a highway view, we would sell for less than we paid- which is unacceptable when it can be avoided.

My proposal:

1. Do not cross to the west side of highway 10, thus minimizing human and community impact made by this powerline simply because there are fewer homeowners (those with actual highway addresses).
2. If hwy 10 must be crossed, it should cross back to the east side at ridge road. There is only one private residence south of ridge road on the east side. As opposed to the 14 on the west side, south of Ridge Rd. Reducing community impact.
3. If the route is already set and not willing to change, payment to the property owners should consist of nothing less than: Payment for each tree taken down, payment to reroute driveways that will be newly exposed to the highway, payment to each homeowner for the full depreciation of their property value, and finally payment for use of our land in a way we were not given a choice.

Our rights as homeowners have been violated, I feel like we have no say in this decision that will only effect you for a short time- but will effect us, the permanent residents of this area, for a lifetime.

Thank you for your time a consideration.

Kim Carlson  
34497 Hwy 10  
Motley, Mn

Sent from my iPhone

**From:** [Birkholtz](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Comments on Docket Numbers (14-853 and 15-204)  
**Date:** Tuesday, May 26, 2015 9:56:24 PM

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## Motley Area Transmission Project -Docket Numbers (14-853 and 15-204)

- 1) The Motley Area 115kV Transmission Project primary purpose appears to provide electric service to the propose new CWP Fish Trap lake distribution substation to provide electric power to the new Minnesota Pipeline pumping station which is in close proximity to the Todd county line as well as to meet the growing needs towards the west (Motley area). Could this project be accomplished by 1) Collaboration between Great River Energy, Todd-Wadena Electric Coop and Crow Wing Power and thus eliminating the issue of the river crossing at Crow Wing River as well as reducing the environmental impact on the proposed route? 2) Utilizing the West option which is an established, straighter as well as shorter route, in addition to having existing poles and ROW which will result in less displacement of the natural habitat? 3) Has the alternative of rerouting along the river to a narrower crossing being explored, so as to circumvent the issue of a wider river crossing, if the west route is utilized?
- 2) We owned 280 acres along the east route. Currently there are existing lines running along our property east/west and north/south which buzzed incessantly. Recently, we also purchase another 26 acres at \$3000 per acre to stop development on the south side of our house to preserve the natural woodlands and wildlife as well as reduction of traffic.

Although we run livestock on our property, we strongly believe in the conservation of existing natural habitat and treasure our woodlands very much. Our pride and joy along 51<sup>st</sup> Avenue, are carefully preserved prime strips of woodlands with mature oaks, maple and birch which are homes to many wildlife. This is also the place where our family including grandchildren enjoys foraging for mushrooms and other foods. Within this strip of woodlands as we have observed owls, eagles, hawks, sandhill cranes, wild turkeys, foxes and black bears. This is also our prime deer hunting grounds.

In the worst case scenario, if the decision is made to use the east route, will the side with existing poles be used? How much more woods will this project decimate on our property. Our primary concerns that that a width of 80 is not that wide and as it is, the east side abutting our property is already open land. Taking away more woods will result in loss of windbreak and wildlife.

I will be happy to answer any questions you may have. I am available by phone most days between 2:30pm-3:30pm or after 8pm.

Sincerely  
Ralph Birkholtz

5118 124<sup>th</sup> St SW  
Pillager, MN 56473

**From:** [Pat & Laurie Humphrey](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204  
**Date:** Tuesday, May 26, 2015 10:21:51 PM  
**Attachments:** [Richard Davis.doc](#)  
[photos.doc](#)  
**Importance:** High

---

Dr. Davis:

Please find attached our Public Comment regarding Motley Area 115 kV Transmission Line Project.

Also attached are photos. I will attempt to send movies of the swans in separate emails.

Sincerely, Patrick and Laurie Humphrey

Richard Davis  
MN Department of Commerce  
85 7<sup>th</sup> Place East Ste. 500  
Saint Paul, MN 55101-2198

May 26, 2015

Motley Area 115 kV Transmission Line Project  
Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204

Dear Mr. Davis:

We appreciate your concerns regarding this project.

We live on the East route option of Great River Energy's proposed 115 kV overhead transmission line. We live on the corner of Cass County Road 31 (AKA: 51<sup>st</sup> Avenue SW Pillager) and 132<sup>nd</sup> Street Southwest Pillager (fire number 5088). Since we live at the junction where the proposed line will change direction, we will be impacted from the north, east and south boundaries of our property. I did meet with Mr. Huering, from Great River Energy, on May 26<sup>th</sup> regarding this project. During our meeting he informed me that there would be a need for transmission poles to be secured with guidelines. So not only would there be transmission poles and lines but guidelines as well. On top of that we would still have the existing poles and power lines that would pass by our home. Diverters would only add to the gaggle of lines that would surround our home. This means unsightly transmission lines will surround most of our property. Those proposed lines coupled with the existing poles and power lines poses several concerns for us.

My wife and I enjoy feeding and watching the birds in our neighborhood. We have attached photos and videos regarding a variety of birds that will be impacted by this project. The attached photos are taken from our yard, most of which, are looking south at the field where the proposed transmission lines might run. Yearly we have large flocks of Trumpeter Swans landing in the field south of our home (especially before ice out). We have also had Sand Hill Cranes landing in that same field. Since these lines pose a threat to the flight patterns of these birds we are asking that these lines not be considered for the proposed East route option. Not pictured are Trumpeter Swans that we have observed landing in the fields to the north, east and west of our property that would also encounter that same danger from the transmission lines coming from the North. At our meeting Mr. Huering stated that it would be hard to prove that these lines would harm the birds. But wouldn't it also be hard for Great River Energy to prove that it wouldn't?

In addition, the existing power lines, in times of higher humidity, emit a sound that is annoying to listen to. We are concerned that by adding more lines it would cause an increase in noise.

If these lines have no impact on humans, then why not run them North and South through Motley (the shortest and most efficient route)? Power lines already exist across the Crow Wing River near Motley. Regarding the landing strip owned by Morey's either bury the lines for that short distance or divert around it to the west. Environmentally this would be the most sensible option.

Thank you for your time and consideration in this matter. We look forward to hearing from you.

Respectfully submitted by,  
Patrick and Laurie Humphrey  
5088 – 132<sup>nd</sup> Street SW, Pillager, MN 56473  
218-746-3674 [watchman2020@brainerd.net](mailto:watchman2020@brainerd.net)



**Sand Hill Cranes      South of Pillager fire number 5088**





**Trumpeter Swans South of Pillager fire number 5088**





**Trumpeter Swans taking flight from southwest field  
Northwest flight toward (Ted Sullivan's driveway below)**





**Wild Turkeys**

**Pillager fire number 5088 north and south**





**Pheasants at Pillager fire number 5088**





**Sand Hill Cranes along proposed east route option photos taken: May 26, 2015**



**From:** [Pat & Laurie Humphrey](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204  
**Date:** Tuesday, May 26, 2015 10:27:11 PM  
**Attachments:** [Swans.MOV](#)

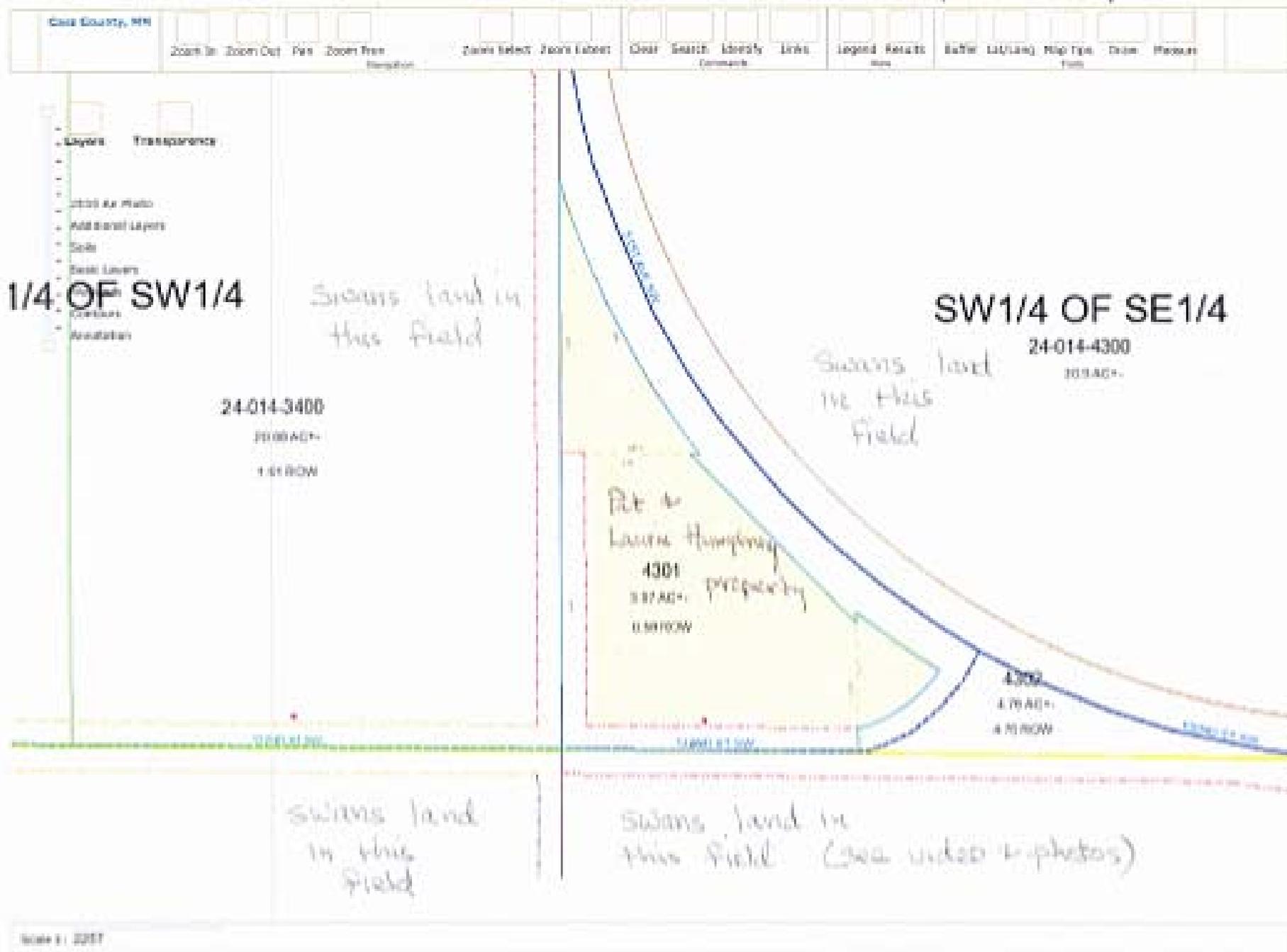
---

Mr. Richard Davis:  
Movie of Swans from Patrick and Laurie Humphrey

**From:** [Pat & Laurie Humphrey](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204  
**Date:** Tuesday, May 26, 2015 11:06:37 PM

---

Mr. Davis:  
Attached are maps of our property: Patrick & Laurie Humphrey 5088 - 132nd  
Street SW Pillager, MN 56473





### Proposed East Option route Mottley Transmission Line

The blue line that is shown indicates the proposed transmission line that we propose. It basically surrounds our property.

Patrick + Laurie Humphrey  
5888 132nd St. S.W.  
Blaney Mann 56873  
Ph. (216) 746-3674

watchman 2020 @brainerd.net

**From:** [Pat & Laurie Humphrey](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204 VIDEO enclosed  
**Date:** Thursday, May 28, 2015 7:55:40 AM  
**Importance:** High

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Mr. Davis:

The second of two movies of Trumpeter Swans from Patrick and Laurie Humphrey, 5088 -132nd Street SW Pillager, MN 56473 218-746-3674

We had trouble sending this video (file too big) so we placed it on YouTube:  
<https://youtu.be/BwowBVJSr20>

This video was filmed from our yard (fire number 5088 Cass County) looking South. This is directly where the proposed Transmission Lines would be placed. This is why we oppose the Motley Area 115kV Transmission Line Project east option.

Please let us know you have received all information we have emailed.

With respect to you and the environment, Patrick and Laurie Humphrey

Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204

**From:** [Dan Donahue](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Cc:** [mstrohfus@grenergy.com](mailto:mstrohfus@grenergy.com)  
**Subject:** River Crossing  
**Date:** Thursday, May 28, 2015 11:06:55 AM  
**Attachments:** [plat map 5-15.pdf](#)

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5-24-15

Richard Davis, Environmental Review Manager

Dear Richard

I attended Motley Public Information and Review meeting for the Motley area Transmission Project that was held May 19<sup>th</sup>. I am a land owner in South May Township, Cass County, where this project would cross the river on the projected West route. The crossing would be the longer of the two river crossings presented at the meeting.

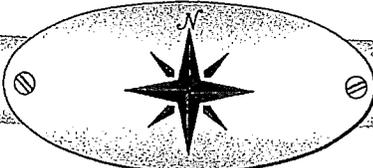
I am writing to express my support for the East line option. From my view point the West line route not only crosses directly in front of my house but it also crosses directly in front of my cabin on the river as well. When I measure the width of the corridor right of way there will be a substantial number of trees that will be removed in front of both my home and the cabin. They would be very noticeable and visible.

It would also impact the view from my cabin as it crosses directly in front of it, which would be there as an eye sore for the future. I am also concerned for the effects this will have on the value of my property in the future should I need to sell. The power line will be there to see forever, 24 /7. Obviously I would prefer not to have this in my back yard due to the aesthetic impact, the land impact, and how I feel it would impact my property value.

As I have reviewed the east line route I notice that it will impact many less home owners along this route. There seems to be more fields and fewer trees that need to be removed. As I view the property where the current lines cross the river there are fewer cabins along the river where this line would cross. With a minor change to the river crossing you could move the power lines more to the east and cross in an area that could be even further away from cabin views from that area.

This area looks to be owned by Minnesota Power and Light Company and would be crossing in an area that is not developed with cabins and would not cross directly in front of any cabins on either side of the river. (See Attached Map, circled area) It looks as if the river crossing would need to be moved 100 to 200 yards to the east from its current river crossing. This would cross the river from the Minnesota Power and Light Property on the north side of the river to the south side of the river where the line could then connect on the Morrison County side to follow the highway. You are welcome to contact me with questions.

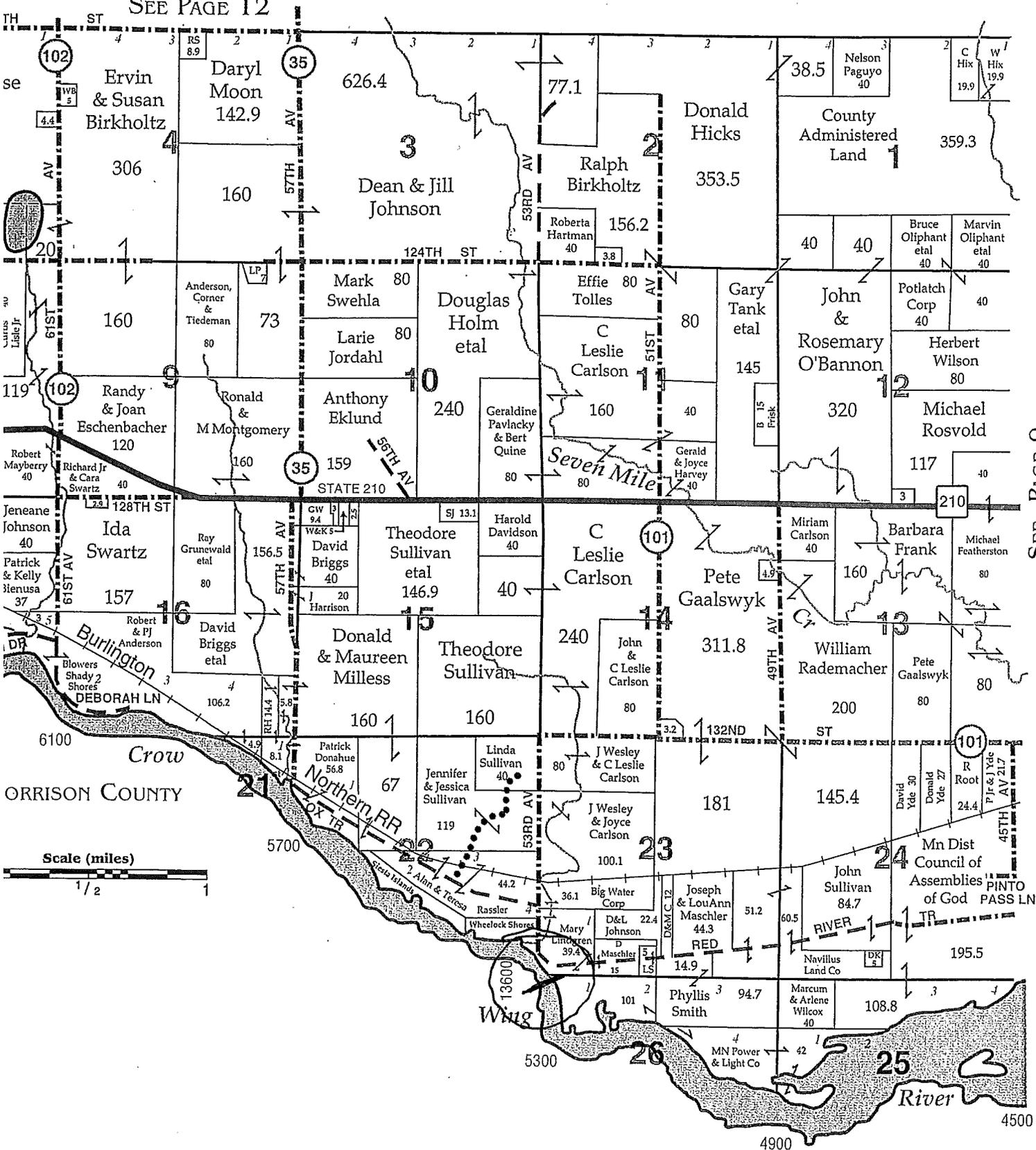
Sincerely, Daniel Donahue



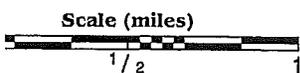
# T.133N. - R.31W.

©1999 Cloud Cartographics, Inc. St. Cloud, MN 56301

SEE PAGE 12



SEE PAGE 9



**From:** [Brad VanVickle](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Public Comment: Motley Transmission Project  
**Date:** Thursday, May 28, 2015 11:17:18 AM  
**Attachments:** [Trumpeter Swans.pdf](#)

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Good Morning Mr. Davis,

I was unable to attend the Public Meeting regarding this project, but I wanted to be heard regarding the impact of the project.

If allowed to follow the East Option, I believe this project will have a large, negative impact on Trumpeter Swans, which are finally regaining some decent numbers after being close to extinction. These birds have been using the field South of the Humphrey property and the field South of my property (which lies right on CR 31), and generally they land from, and take off to, the East, which would fly them directly into the power lines. We also have a few pairs of Sand Hill Cranes using this field and the field to the East (I have even seen them doing their "courting" dance in the field South of my home). I have attached a PDF showing the field where the swans congregate and the direction of flight.

I know the people that are against the West option have mentioned Bald Eagles as a reason not to use that option, but we have as many (if not more) bald eagles in our area too. In fact, Pat and Laurie Humphrey have mentioned that after deer season, when hunters had left their field dressing from their deer in the field South of their home, there were something like 12 bald eagles feeding on the waste. I also think the river is more shallow at the East crossing point which makes it easier for Eagles (and other birds of prey) to fish.

Being that the West option area is heavily wooded, putting the line over there will not have much affect on Swans, Sand Hill Cranes, etc. Also, since there is already a power line over there, why would it make sense to encumber all the additional land required to place in an additional route instead of running the line where there is already a power line? The line would also be more "camouflaged" over in the heavy trees on the West option.

Thank you for your consideration. I hope these reasons (along with others brought to your attention by other people) will make our case for not putting the power line along CR 31.

My information:

Brad and LaVonne VanVickle  
13025 51st Ave. SW  
Pillager, MN 56473  
Home: 218-746-3101  
Cell Brad 218-851-7400  
Cell LaVonne 218-851-7440  
email: [bvanvick@gmail.com](mailto:bvanvick@gmail.com)

Sincerely,

Brad VanVickle



These data are provided on an "AS-IS" basis, without warranty of any type, expressed or implied, including but not limited to any warranty as to their performance, merchantability, or fitness for any particular purpose.

This map is not a substitute for accurate field surveys or for locating actual property lines and any adjacent features.



Date: 5/28/2015

**From:** [Adam Loberg](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Motley Area 115 kV Project  
**Date:** Monday, June 01, 2015 2:21:08 PM

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Good afternoon Rich,

I posted the below info on the "Public Comment" section of the project website, but wanted to send my comments to you directly as well. I appreciate you looking into this information on the project and look forward to the outcome(s) of the EA and other information as the project progresses. Feel free to contact me with any questions.

Thanks and have a great day,  
Adam Loberg

218-656-0787

### **Impacts**

Please share your comments on the potential issues and impacts that should be considered in the environmental document to be prepared for this project. If you are commenting on a draft environmental document that has already been issued (e.g., draft EIS, draft site permit), what issues and impacts need to be further addressed?

I had made comments at the Motley forum on the 19th of May 2015, though had forgotten to address the number of trumpeter swans and migratory birds that use the wetlands just west of 57th Ave SW on Troy & Neva Gullickson's property. Troy and his family have seen up to 120 trumpeter swans in the wetland behind their cabin at one time. This doesn't include the numerous Canadian Geese, multitudes of species of ducks and other migratory waterfowl. These swans, geese, ducks, and a multitude of waterfowl fly over my house as they go between his wetland, the Crow Wing River behind my house, and the local fields to feed and rest. I also see them in the wetland on Gullickson's property as my wife and I take walks along 57th, so have been witness to them on innumerable occasions. Rich Davis had mentioned that power lines pose a problem for the swans and so I would ask that not only their presence, but also the sheer number of them to be considered in the EA. Due to the fact that many migratory waterfowl visit the wetlands after visiting other sensitive areas across the region, it is not beyond reason to believe, and even quite likely, that the diversity of the waterfowl have carried other endangered/ threatened species of vascular plants, lichens, fungi, fish, mollusks, and even possibly amphibians & reptiles into the wetland. These things considered, they also should be looked at during the EA.

### **Mitigation**

Please share your comments on how the issues and impacts you've listed might be mitigated. If this is a project with a route, are there alternate routes or route segments that should be considered that would mitigate impacts? If so, please describe them. If this is a project with a site, are there alternate sites that should be considered that would mitigate impacts? If so, please describe them.

The East route has much less environmental impact as it is almost exclusively higher, dry ground. It not only has much less environmental concerns, it would also be easier to access and construct since it is higher, more firm ground. Power poles rarely stay straight upright for long in wetland areas because of the ground movement and ice the frost cycle causes, where higher ground

typically stays straighter upright for much longer. GRE had also mentioned that the Eastern route has a more favorable river crossing, among other advantages over the Western route. Please consider that as a much preferred route option.

Thank you,  
Adam

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Loberg Mon Jun 1 14:21:40 2015 15-204  
**Date:** Monday, June 01, 2015 2:21:52 PM

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This public comment has been sent via the form at: [mn.gov/commerce/energyfacilities/publicComments.html](http://mn.gov/commerce/energyfacilities/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Motley Area 115 kV Project

Docket number: 15-204

User Name: Adam Loberg

County: Cass County

City: Motley

Email: [advantageenterprises@gmail.com](mailto:advantageenterprises@gmail.com)

Phone: 2186560787

Impact: I had made comments at the Motley forum on the 19th of May 2015, though had forgotten to address the number of trumpeter swans and migratory birds that use the wetlands just west of 57th Ave SW on Troy & Neva Gullickson's property. Troy and his family have seen up to 120 trumpeter swans in the wetland behind their cabin at one time. This doesn't include the numerous Canadian Geese, multitudes of species of ducks and other migratory waterfowl. These swans, geese, ducks, and a multitude of waterfowl fly over my house as they go between his wetland, the Crow Wing River behind my house, and the local fields to feed and rest. I also see them in the wetland on Gullickson's property as my wife and I take walks along 57th, so have been witness to them on innumerable occasions. Rich Davis had mentioned that power lines pose a problem for the swans and so I would ask that not only their presence, but also the sheer number of them to be considered in the EA. Due to the fact that many migratory waterfowl visit the wetlands after visiting other sensitive areas across the region, it is not beyond reason to believe, and even quite likely, that the diversity of the waterfowl have carried other endangered/ threatened species of vascular plants, lichens, fungi, fish, mollusks, and even possibly amphibians & reptiles into the wetland. These things considered, they also should be looked at during the EA.

Mitigation: The East route has much less environmental impact as it is almost exclusively higher, dry ground. It not only has much less environmental concerns, it would also be easier to access and construct since it is higher, more firm ground. Power poles rarely stay straight upright for long in wetland areas because of the ground movement and ice the frost cycle causes, where higher ground typically stays straighter upright for much longer. GRE had also mentioned that the Eastern route has a more favorable river crossing, among other advantages over the Western route. Please consider that as a much preferred route option.

Thank you,

Adam

Submission date: Mon Jun 1 14:21:40 2015

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
andrew.koebrick@state.mn.us

**From:** [Donald Milless](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Cc:** [staff\\_cao \(PUC\)](#); [DeBleeckere, Tricia \(PUC\)](#)  
**Subject:** Motley Area Transmission Project - Comments on Scope of the Environmental Assessment - Docket numbers 14-853 and 15-204  
**Date:** Monday, June 01, 2015 10:33:33 PM

---

Hi Rich,

Below are my comments on the Motley Area Transmission Project – Scope of the Environmental Assessment

Docket numbers 14-853 and 15-204

1. At the May 19<sup>th</sup> Public Information and Environmental Assessment Scoping Meeting, Great River Energy staff indicated that this project is being proposed at this time because of the Minnesota Pipe Line Fish Trap proposed Pumping Station. Have alternate options to supply this pumping station been considered from the south?
2. If the Motley Area Transmission Project must be completed, I do not feel the West Option is the best choice for the following reasons.
  - The West Option route has more human development along this route and therefore more impact in terms of aesthetics (sunrises/sunsets, noise, etc.), and loss of use of personal property for recreational purposes (i.e. hunting, walking in the woods, etc.). There are many private residences along the West Option whose homes are less than 100 yards from the proposed Transmission Line, and several homes that are within 50 yards of the proposed location of the Transmission Line, and I know of one within 40 yards of the proposed Transmission Lines with young children. There are many less homes within such a close distance of the East Option route.
  - The West Option route has approximately double the amount of wooded land that will require cutting than the East Option route. I estimate the West Option route has approximately 1.5 miles of woods that would require cutting, while the East Option route has approximately  $\frac{3}{4}$  of a mile.
  - The West Option route has a wetland complex on both sides of 57<sup>th</sup> Ave SW, south of Hwy 210. The 115 kV Transmission Line would be required to cross approximately 750 feet of wetland, if it is constructed on the east side of 57<sup>th</sup> Ave SW as planned. The wetland complex is even larger on the west side of 57<sup>th</sup> Ave SW. This wetland complex is home to many wildlife that will be impacted by the 115 kV Transmission Line. There is a nesting pair of Bald Eagles on the west side of 57<sup>th</sup> Ave SW that routinely crosses back and forth directly where the Transmission Line is proposed. This pair of Bald Eagles have been nesting in this same location for at least 20 years, as long as I've lived here. There are nesting Trumpeter Swans in this wetland complex that also routinely cross where the Transmission Line is proposed. There are Sandhill Cranes and otters that inhabit this wetland area that will also be impacted by the Transmission Line. There does not appear to be any wetlands on the East Option route.
  - The biggest impact that will be caused if the West Option route is selected is

the impact where the Transmission Line will cross a pristine stretch of the Crow Wing River. Great River Energy (GRE) staff indicated that the West Option route would require the Transmission Lines to cross for more than a 1,000 foot crossing, while the East Option route would only require approximately a 500 foot crossing. The 1,000 foot West Option crossing would require significant and substantial Transmission Structures on either river bank to support the massive weight of the Transmission Lines. In addition to the much longer crossing and much more intrusive Structures for the West Option route, the West Option route would require a brand new river crossing, whereas the East Option route would cross the river where existing power lines already cross the river. The West Option route would have a much more significant impact on the aesthetics and wildlife of the Crow Wing River, not to mention impacts on property values and recreational use.

Please send a response email acknowledging receipt of these comments and that this email meets the requirements for formal submittal of comments on the Motley Area Transmission Project, Docket numbers 14-853 and 15-204.

Thanks.

Don Milless

218-746-3077

**From:** [greg frisk](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Tree !!!  
**Date:** Tuesday, June 02, 2015 12:55:02 PM

---

Hi Rich. It was good chatting with you guys in Motley last month. Nice to put faces with names. I don't remember if you were in on the discussion of the old, large tree that is located on our old farm, now showing on the maps as Randy Frisk property, located directly across from the Mark Bettis Jr home, on the South side of Azalea rd. (1/2 mile East of US 10)

Anyway, the existing high line was actually constructed to go around that tree, and those of us that live here would like to see that tree saved again. It has become kind of a landmark in our community, and of course if it is destroyed, there is no replacing it. I don't know exactly how the line will run there, maybe even missing that tree if the line were to run South of the Flansburg and Knossala homes. At any rate, it would take a couple poles-maybe three, and a few hundred feet of wire to once again allow that tree to remain. We think that's a small cost to bear versus destroying a large 100 year old friend.

Thanks, when your up North again, stop in for a cold one.

Greg Frisk  
1810 Azalea Rd  
Motley, Mn 56466

218-352-6416

**From:** [John Ringle](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** 115kV Powerline Project  
**Date:** Wednesday, June 03, 2015 7:01:41 AM  
**Attachments:** [Opposition to GR Poweline in May Township.docx](#)

---

Dear Mr. Davis,

Please accept our attached comments on the proposed Motley area 115kV Transmission line project.

John and Teresa Ringle

June 2, 2014

Richard Davis, Environmental Review Manager  
Minnesota Dept. of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101  
[richard.davis@state.mn.us](mailto:richard.davis@state.mn.us)

RE: Great River Energy and MN Power Motley Area 115kV Transmission Line Project  
PUC Docket Numbers 14-853 and 15-204

Dear Mr. Davis,

Please accept our comments on the need and route permits for the PUC Docket numbered projects above – Motley Area 115kV Transmission Line Project. I am a property owner at 5354 Ox Trail SW, Pillager, MN, adjacent to the East Route Option and am concerned for several reasons: 1) The proposed east route appears to be over a mile longer than the west route option, thereby increasing the environmental impact by perhaps 20% based on corridor distance alone, 2) according to the Cass County Web mapping system, there are 13 e-911 addresses along the western corridor and 15 along the east corridor, making the environmental and visual impact to addressed residential properties greater in the eastern corridor, 3) The Crow Wing River crossing area appears to be approximately the same distance in both east and west corridors, negating any real environmental differences, 4) The east corridor has 2 platted parcels included where future development will probably occur. The west corridor has none, and 5) There already is an existing powerline corridor on the western option.

For these reasons, I am opposing the eastern route in favor of taking the shorter less populated western route. If the western route is not chosen, I ask that: 1) The route stay in the middle of the agricultural properties, away from the county and township road rights-of-way on the east route to minimize the visual disturbance and property devaluation that will occur when a powerline of this magnitude is adjacent ones property, and 2) consider fair market compensation and/or fair eminent domain for the adjacent properties (mine included) next to parcels where the powerline eventually ends up being located.

I further ask that you consider the MN Highway 64 corridor as this is an even more direct route to the eventual destination, or consider moving an option even farther east toward Pillager, where the impact to Cass County, especially May Township would be even less.

Thank you for your consideration,

Teresa (Rassler) Ringle  
1710 Ventura Dr. SE  
Bemidji, MN 56601

Please provide your contact information. This information and your comments will be publically available.

Name: Patrick + Laurie Humphrey Phone: (218) 746-3674

Street Address: 5088 132nd St. Southwest

City: Pillager State: Minn ZIP: 56473

Email: watchman2000@brainerd.net

Please share your comments on the proposed Motley Area 115 kV Transmission Line Project.

- What human and environmental impacts of the proposed transmission line should be studied in the environmental assessment (EA) prepared for this project?
- Are there any specific methods to address (mitigate) these impacts that should be studied in the EA?
- Are there any alternative routes or route segments that should be considered to address these impacts?
- Are there other ways to meet the stated need of the proposed project, instead of the proposed transmission line?
- What alternatives to the proposed project should be studied in the EA?

May 28, 2015

Motley Area 115kV Transmission Line Project  
Docket Nos. ET2, E015/CN-14-853 and ET2, E015/TL-15-204

Dear Mr. Davis:

Following my meeting with Rick Heuring on Tues, May 26, I came away with the impression that the east option was Mr Heuring's preferred route for these transmission lines. IF the proposed east option continues to be the primary option being considered, we would like to request that an Environmental Impact Statement be done prior to any decision made.

Since this will permanently impact the environment and the fly ways of Trumpeter Swans, Sand Hill Cranes Canadian Geese and the like, for generations to come, we feel that further study is needed regarding this matter.

Sincerely

Pat + Laurie Humphrey

P.S.

Video of Trumpeter Swans, south of our property,  
located on YouTube: <http://youtu.be/BW0wBVJ5r20>