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

October 26, 2015

Andrew Levi, Environmental Review Specialist
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 for a Route Permit for the Bull Moose 115 kV Transmission Line in Cass County, Minnesota
Public Utilities Commission (PUC) Docket Number: ET-2/TL-15-628
Environmental Review Database Number: 20150366

Dear Mr. Levi:

The Minnesota Department of Natural Resources (DNR) has reviewed the Application for a Route Permit for the Bull Moose 115 kV Transmission Line Project in Cass County, Minnesota. Please consider the following comments regarding process, routing alternatives, and topics for Environmental Assessment (EA) inclusion.

Process

The Bull Moose Transmission Project is located along the Preferred Route Alternative for the proposed Line 3 Pipeline Replacement Project and the Sandpiper Pipeline Project. The Line 3 Pipeline Replacement Project is currently under review, with alternative routes proposed by the public and state agencies also under review. The Sandpiper Pipeline Project is also in the midst of an alternatives analysis. The location and purpose of the Bull Moose Transmission Project is dependent on the outcome of ongoing alternatives analyses for Line 3 and Sandpiper Projects. Review of all three projects and any other dependent project proposals should include a cumulative impacts analysis reflecting these related projects and associated impacts. The timeline and date of decisions for these three projects, and any other closely related projects, should reflect these dependencies.

Routing Alternatives

There is an approximately .25 mile greenfield (no existing corridor) crossing associated with this line within the Foot Hills State Forest in close proximity to a wetland (outlined in red below). This would place this entire wetland complex within a triangle of utility lines. The EA should include the purpose for this design.

Another option should be analyzed following the existing lines in the location shown in the red circle below. For this option, pole placement to avoid wetland impacts would be an important part of the impact comparison.

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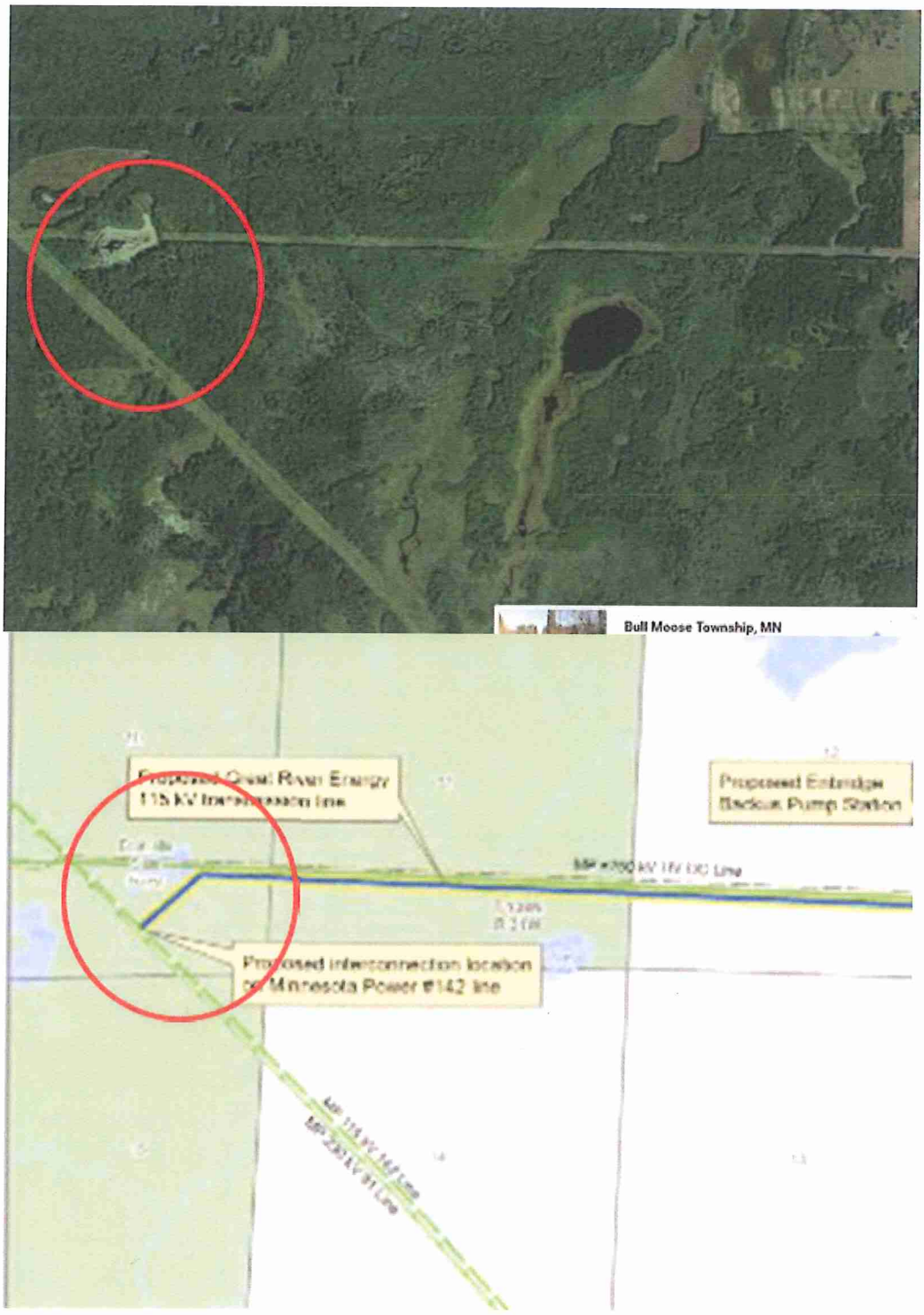

Topics for EA Inclusion

The EA should include a discussion of using seasonal (winter) construction and maintenance activities as a mitigation measure for impacts to wetland, forest, and rare species such as the Northern Long-eared Bat.

The EA should discuss methods to reduce risks to birds, including whether bird diverters are proposed. For example, will tree height negate the need for bird diverters in some locations or would the line be above the trees? Are there locations where Great River Energy would propose bird diverters? For example, there are records of trumpeter swans in the vicinity that may use open corridors between wetlands/lakes. Placing diverters in less wooded openings may reduce risk of avian collision for this rare species.

The line would cross several sensitive areas (wetland complexes). The EA should distinguish the differences in the existing pole placements (spacing/heights) with the new line placement (spacing/heights). Even though the new line would be located along an existing corridor, if poles are needed to be spaced more frequently than the existing line, it may be difficult to avoid additional wetland resource impacts (the east/west segment of the line would co-locate with a 250 kV line).

The EA should discuss proposed maintenance methods. The wire zone/border zone method should be discussed as a mitigation measure for right-of-way (ROW) forest impacts and habitat encroachment. The wire zone/border zone concept allows for different types and heights of vegetation in the ROW. The concept differentiates between the wire zone directly under the conductors and the remaining border zone within the ROW and generally allows for different, yet compatible, vegetation types in these separate zones. Types and heights of site vegetation and topography should be discussed as part of this analysis.

> Wire Zone: Area directly underneath the conductors, including potential conductor sway. Vegetation in this zone consists of low-growing forbs and grasses.
>
> Border Zone: Area that begins at the outside edge of the wire zone and extends to the edge of the easement or other right of way. This zone may contain additional low-growing woody plants and trees.

Thank you for the opportunity to review the Bull Moose 115 kV Transmission Line Project. Please contact me with any questions.

Sincerely,

Jamie Schrenzel

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

cc: Larry Hartman, Minnesota Department of Natural Resources
Cezar Panait, Minnesota Public Utilities Commission
Dan Lesher, Great River Energy

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October 26, 2015

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Re: In the Matter of the Route Permit Application of Great River Energy for the Bull Moose115kV Transmission Line Project in Cass County
PUC Docket No ET-2/TL-15-628

Dear Mr. Levi:

On September 18th, 2015, a request was made for public comment on the scope of the Environmental Assessment (EA) relating to the route permit application by Great River Energy (GRE) for a 115kV High Voltage Transmission Line (HVTL) in Cass County. The Minnesota Department of Transportation (MnDOT) submits the following comments in response to the request.

Upon initial review of the project, it appears that the approximate 2.5 miles of proposed transmission line does not directly abut a state trunk highway. MnDOT requests that our agency be made aware of any changes to the proposed project that may make the project area close enough to occupy a portion of current MnDOT right of way.

MnDOT has adopted a formal policy and procedures for accommodation of utilities on the highway rights of way ("Utility Accommodation Policy"). A copy of MnDOT's policy can be found at http://www.dot.state.mn.us/policy/operations/op002.html.

Any HVTL construction work, including delivery or storage of structures, materials or equipment that may affect MnDOT right of way is of concern such that MnDOT should be involved in planning and coordinating such activities. If work is required within MnDOT right of way for temporary or permanent access, please coordinate with Rich Munsch, District 3A Permits, at 218-828-5778 or Richard.Munsch@state.mn.us.
MnDOT has a continuing interest in working with the GRE to ensure that possible impacts to the state transportation system are adequately addressed. We appreciate the opportunity to provide these comments.

Sincerely,

Stacy Kotch

Utility Transmission Route Coordinator

Minnesota Department of Transportation

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