



MINNESOTA DEPARTMENT OF NATURAL RESOURCES
NORTHWEST REGION

ECOLOGICAL & WATER RESOURCES
2115 BIRCHMONT BEACH RD NE
BEMIDJI, MN 56601

September 13, 2016

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

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) is writing in regards to PUC Docket Number 16-327 in the matter of the Application of Minnkota Power Cooperative, Inc. for a Route Permit for the MPL-Laporte 115kV transmission Line Project. The DNR has been working closely with Minnkota Power on a route with the least environmental effects both to the resource and to Itasca State Park, which borders the proposed route to the South. The DNR has met several times, and has conducted on the ground site evaluations and believes that the proposed route is the route Minnkota Power and DNR have agreed to in collaboration. DNR supports the environmental review of this proposed route.

Other proposed routes suggested by Minnkota Power would have cut through the middle of a Minnesota Biological Survey (MBS) site of High Biodiversity, or crossed through Itasca State Park, the premier park of the Minnesota State Park system. MBS sites classified as "high" means the site contains very good quality occurrences of the rarest species, high-quality rare native plant communities, and/or important functional landscapes. The potential previous route areas included several rare features such as nests of red-shouldered hawks which are a species of special concern, rare feature of a quaternary Tunnel Valley formation, and an S2 ranked (meaning imperiled native plant community type) Red Pine-White Pine Forest. Previous routes would also have crossed a high value designated public waterways trout stream in an area that would not be able to be spanned by the placement of the poles. The current proposed route minimizes disturbance to the MBS site, follows road right of way or current power lines, crosses the trout stream where it can be spanned with no structures in the water, and avoids Itasca State Park property.

Because of the sensitivity of this area, DNR may still require as part of the license to cross, surveys for sensitive species along the route through the MBS site, and if rare or Minnesota ESA listed species are present, additional permits may be needed under Minnesota Statute Chapter 6134.

The Northern Long-Eared Bat (NLEB) was listed by the USFWS as a threatened species on April 2, 2015. The NLEB was listed due to white nose syndrome, a fungal disease that has spread throughout the NLEB's range. Because of this disease, other possible cause of NLEB mortality may be important factors affecting the viability of NLEB populations. One such cause is the loss or degradation of summer roosting

habitat. Although this area contains no known roosts, complete surveys have not been conducted in this area. This proposed route however does include trees that may serve as roosting habitat for NLEB. DNR recommends that any tree removal be conducted during the winter months, when roosting by this species would not occur.

If you have any additional questions, please contact me at Theresa.olson@state.mn.us or (218) 308-2672. Thank-you for your continued coordination.

Sincerely,

A handwritten signature in cursive script, appearing to read "Theresa Olson".

Theresa Olson
Regional Environmental Assessment Ecologist