

**From:** [Mary Thompson](#)  
**To:** [Storm, Bill \(COMM\)](#)  
**Cc:** [George, Kevin \(PUC\)](#); [cezar\\_ranait@state.mn.us](mailto:cezar_ranait@state.mn.us)  
**Subject:** Comments on ET-6/TL-16-327  
**Date:** Thursday, September 08, 2016 7:36:17 PM  
**Attachments:** [ET6\\_TL-016-327.pdf](#)

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Please accept the following comments regarding the scoping of the Minnkota Power Cooperative HVTL project, PUC Docket numbers ET6/TL-016-327.

We own property on the proposed route and have significant concerns with the route. Our property is located in Sections 12, 13 & 14 of Itasca Township in Clearwater County. We are opposed to having the transmission line on our property. We are cattle farmers and have significant acreage in comparison to any other private property owner along the route. We have concerns about the safety of this type of line on our property and the potential health and safety impacts to our livelihood. We also stand to have a significant decrease in the value of our property because of the installation of the transmission line due to both the noise that will be created by the line as well as the aesthetics surrounding the line. It would seem that a transmission line that is meant to serve a single business entity and not the public as a whole should have the smallest impact as possible on private land owners and our private economic viability.

In reviewing the application submission we found information that we believe supports our concerns and suggests a route that we would be supportive of. Melissa Doperalski, DNR, noted in a November email that "MNDNR would like Minnkota Power to consider alternatives that avoid the creation of a new corridor through the MBS site and crossing the stream altogether. This could be achieved by heading due east from the starting point and cross north of Big LaSalle Lake along Ridgeway Drive to 105<sup>th</sup> Avenue, then south to 400<sup>th</sup> Street. This route still makes use of county land and limits the habitat impacts of a new corridor by utilizing existing roadway corridors." In reviewing the public land records on both the Clearwater and Hubbard County GIS sites, this route is substantially owned by Hubbard County, in fact Sections 5, 8, 17 and 20 of Lake Hattie township contains only 1 private property owner. The economic impact to private landowners would be significantly less by following the route suggested by the DNR than following the currently proposed route.

While the proposed route does provide separation from the sites of biodiversity significance as noted by the 2013 Farm Service Agency image included in the application, there is a large area of native Lady Slippers growing all along the east side of 281<sup>st</sup> Avenue that will be destroyed by the transmission line. The route along 105<sup>th</sup> avoids the biodiversity significant areas to the same degree as the proposed route and avoids the native Lady Slippers.

In addition to our concerns over the proposed route we also have concerns regarding the process with regard to the permit for MPL – Laporte 115 kV HVTL Project Docket Number ET – 6/TL – 16 – 327. The transmission line has the specific purpose to serve the MPL pumping station on County 95. The permitting process for the pumping station has already been granted and construction has begun. It is apparent that the Public Utilities Commission fully intends to grant the permit to

Minnkota because the station has no ability to run without the line. The ability for the public to truly have an impact on the process appears minimal at best.

Thank you for considering our comments.

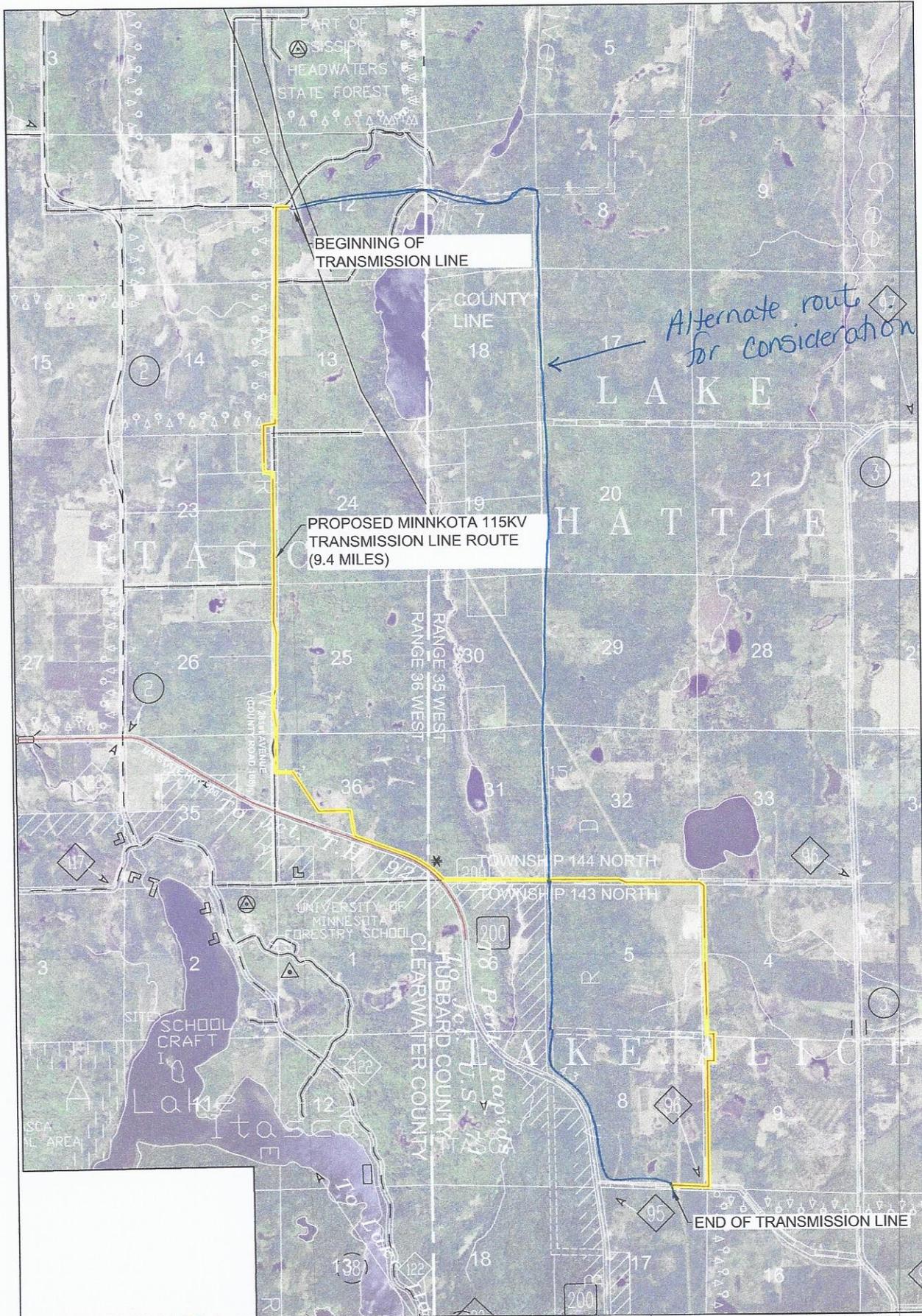
Kenneth & Mary Thompson

19743 281<sup>st</sup> Avenue

Shevlin, MN 56676

218-368-7980

[mmtson@gvtel.com](mailto:mmtson@gvtel.com)



**PRELIMINARY  
CONFIDENTIAL**

				DRAWN		MPL - LAPORTE 115KV TRANSMISSION LINE	
				DATE 03/24/16		CLEAR WATER COUNTY AND HUBBARD COUNTY, MINNESOTA	
				APPROVED		SCALE SHEET 1 OF 1	
				PROJECT #		DWC	
				BY		DWG.NO.	
DATE	PROJECT #	WO #	REVISIONS	BY	WO #		

**Minnkota Power**  
COOPERATIVE, INC.

## Sarah L. Johnson

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**From:** Sarah L. Johnson  
**Sent:** Friday, April 08, 2016 10:07 AM  
**To:** Sarah L. Johnson  
**Subject:** FW: Minnkota Power - MPR Laporte 115 kV Transmission Line - Early Coordination  
**Attachments:** 2756\_001.pdf; Minnkota115kV.bmp

**From:** Terry Johnson [mailto:tjohnson@minnkota.com]  
**Sent:** Tuesday, November 17, 2015 9:12 AM  
**To:** Louise I. Segroves <LSegroves@barr.com>  
**Subject:** FW: Minnkota Power - MPR Laporte 115 kV Transmission Line - Early Coordination  
**Importance:** High

**From:** Doperalski, Melissa (DNR) [mailto:melissa.doperalski@state.mn.us]  
**Sent:** Monday, November 16, 2015 4:16 PM  
**To:** Terry Johnson  
**Subject:** RE: Minnkota Power - MPR Laporte 115 kV Transmission Line - Early Coordination  
**Importance:** High

Terry,

Based on our previous discussion included herein are comments, suggestions (along with a little more detail than our discussion included), and responses to some of the questions that you had when we spoke for your consideration for inclusion to the Route Permit Application (RPA) and/or Environmental Report (ER) for the proposed MPR Laporte 115 kV Transmission Line project. We are including a couple of route alternative options that you may or may not have considered in your route planning to date that from the DNR's perspective, would reduce impacts to sensitive and protected features.

We appreciate the effort that Minnkota Power has taken in working to find the least environmental impact route crossing the LaSalle Creek. The MNDNR discourages greenfield crossings when feasible particularly when there are a number of rare or sensitive features within an area that would be negatively affected by clearing a corridor. In the case of the LaSalle Creek crossing and adjacent areas, this includes MBS sites of High and Outstanding Biodiversity, several different types of native plant communities, rare species, and LaSalle Creek is a designated trout stream. The proposed route would create additional habitat fragmentation and disturbance within the MBS preliminary site (#15028), where red-shouldered hawks (state Special Concern), northern long-eared bats (state Special Concern, Federally threatened) and several state critically-imperiled (FDc23a1, FDc24a1), imperiled (FDc34a) and vulnerable (FDn33a1) native plant communities have been documented. Red-shouldered hawks are a species dependent upon intact blocks of forest habitat- so creating a second, parallel utility corridor through this area reduces the habitat value for this species. Additionally, several northern long-eared bat roost trees have been documented within this area, so any development projects would need to carefully address avoiding take of this species.

In review of the figure provided and other maps/resources available to us, there are existing disturbed corridors in the general vicinity that may offer the opportunity for routing that includes roadways and an existing Koch pipeline corridor. We had discussed the Koch pipeline as one possible alternative. In our discussion, you had mentioned that it wasn't feasible due to interference issues and that it also wouldn't provide a least environmental impact scenario as the route you have proposed. The MNDNR would look to the RPA and the ER to clearly describe why this existing corridor wasn't feasible and why it didn't provide the least environmental impact scenario.

In addition, the MNDNR would like Minnkota Power to consider alternatives that avoid the creation of a new corridor through the MBS site and crossing the stream altogether. This could be achieved by heading due east from the starting

point and cross north of Big LaSalle Lake along Ridgeway Drive to 105<sup>th</sup> Avenue, then south to 400<sup>th</sup> Street. This route still makes use of county land and limits the habitat impacts of a new corridor by utilizing existing roadway corridors. Another option would be from 281<sup>st</sup> Ave to 200 to 400<sup>th</sup> Street. This would be in accordance with [MN Rules Chapter 6135](#), specifically as it pertains to public lands and waters utility crossings. Route should avoid impacts to Itasca State Park.

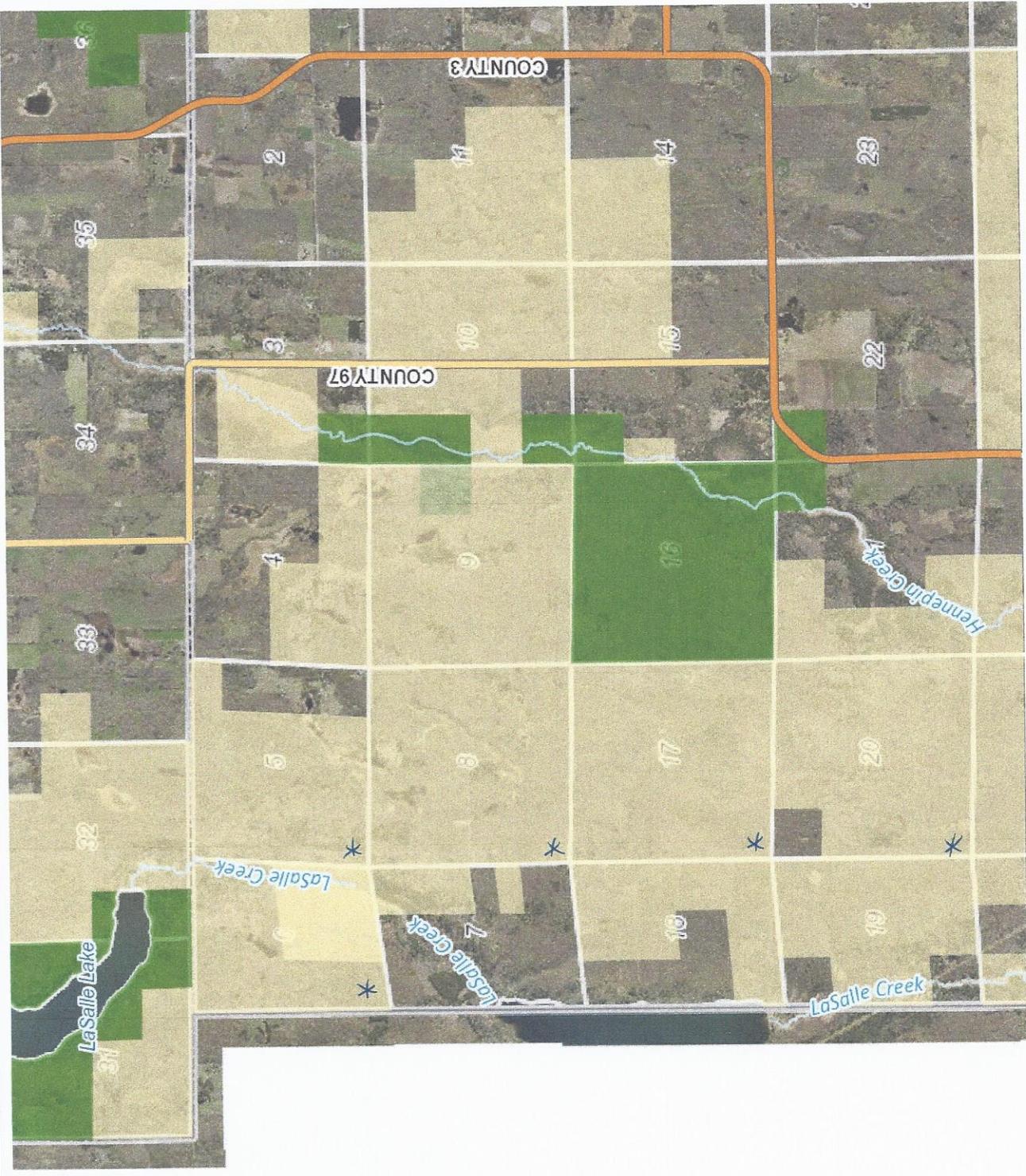
In addition, it is recommended that for wetland/river crossings, that construction occur during winter when the ground is frozen. This will help to minimize vegetation disturbance and decrease the potential for undesirable species, including invasive species, to establish. Also as it pertains to right-of-ways (construction and maintenance) natural vegetation which does not pose a threat to the utility should be allowed to grow in the right-of-way. It is especially important that vegetation buffers remain in place along the banks of the creek. In any areas where ground disturbance has occurred, reseeding should occur with approved, local, native seed mixes that match local native plant community species to the extent practicable. Because LaSalle Creek is a designated trout stream, vegetation maintenance within this corridor should be by mechanical means and should occur outside of spawning/nesting season. This is also in accordance with MN Rules Chapter 6135 as it pertains to crossings of public lands and waters; however, we recommend that this be followed for all other areas as well.

The Minnesota Department of Natural Resources (MNDNR) recommends that the RPA and ER include a discussion on the rare features and species that occur or that may occur within the project area and the potential effects the proposed project may have on them. There is a lot of MNDNR information that is publically available on the Minnesota Geospatial Commons website at <https://gisdata.mn.gov/organization/us-mn-state-dnr>. From review of the figure provided with your early notification letter, you have utilized some of this information already. Other useful shapefiles include MNDNR Native Plant Communities and DNR Hydrography - Designated Trout Streams.

As we discussed, Minnesota Biological Surveys (MBSs) have not been completed for Clearwater County (anticipated to be completed in 2015 - <http://www.dnr.state.mn.us/eco/mcbs/outcomes/map.html>). We appreciate your consideration of this information in routing as indicated in your provided map; however, " it needs to be noted that the information utilized in that map was not complete. I have been able to locate some preliminary site findings within your project area. As indicated, these are preliminary findings which boundaries and full survey data has not been finalized including native plant community types. However, it provides additional information for your consideration. I have attached a map that includes the Hubbard County MBS sites as well as the preliminary Clearwater County MBS sites (and estimated proposed route drawn) for your reference.

Locations of listed species or rare features that are protected are considered non-public information and are not available on the Minnesota Geospatial Commons website. This is information that can only be obtained from the Natural Heritage Information System (NHIS) by request. In our discussion you had mentioned that a NHIS data query had been completed. I was unable to locate a copy of this review and also spoke with NHIS staff who were unable to locate it as well. It may be that it hasn't been uploaded to our system; however, another possibility is that your company or possibly a contractor (?) has a license and access to this information. If your company or a contractor has completed this review, we request that you provide your findings to Lisa Joyal, our Endangered Species Review Coordinator, along with a request for her concurrence for the findings. Lisa's email is [lisa.joyal@state.mn.us](mailto:lisa.joyal@state.mn.us). The Natural Heritage Review Specialist, Samantha Bump, may also be available to assist you. Her contact information is [Samantha.bump@state.mn.us](mailto:Samantha.bump@state.mn.us). If you did receive a response from our NHIS staff, please review the details provided as they may include recommendations not included with this response for avoidance or minimization of impacts. I have touched upon some of the species in this area that may be impacted by the proposed project above.

I noted in my review of the resources within the project area (and as would be identified within your NHIS review letter) that there is a potential for northern-eared bats to be found within the project area. You should be aware that effective May 4, 2015, the U.S. Fish and Wildlife Service listed the northern long-eared bat as threatened under the Endangered Species Act (ESA) and implemented an interim 4(d) rule. The ESA prohibits the take of this species without a permit. It is possible that your project may require a permit. To determine whether the "take" is exempt under the interim 4(d) you should refer to the USFWS Key to the Interim 4(d) Rule available at



Clearwater County

\* Land owned by  
Hubbard County



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Hubbard County owned property along alternate route 183

Created 9/6/2016 at 05:45 PM

Hubbard County - 301 Court Ave, Park Rapids, MN 56470

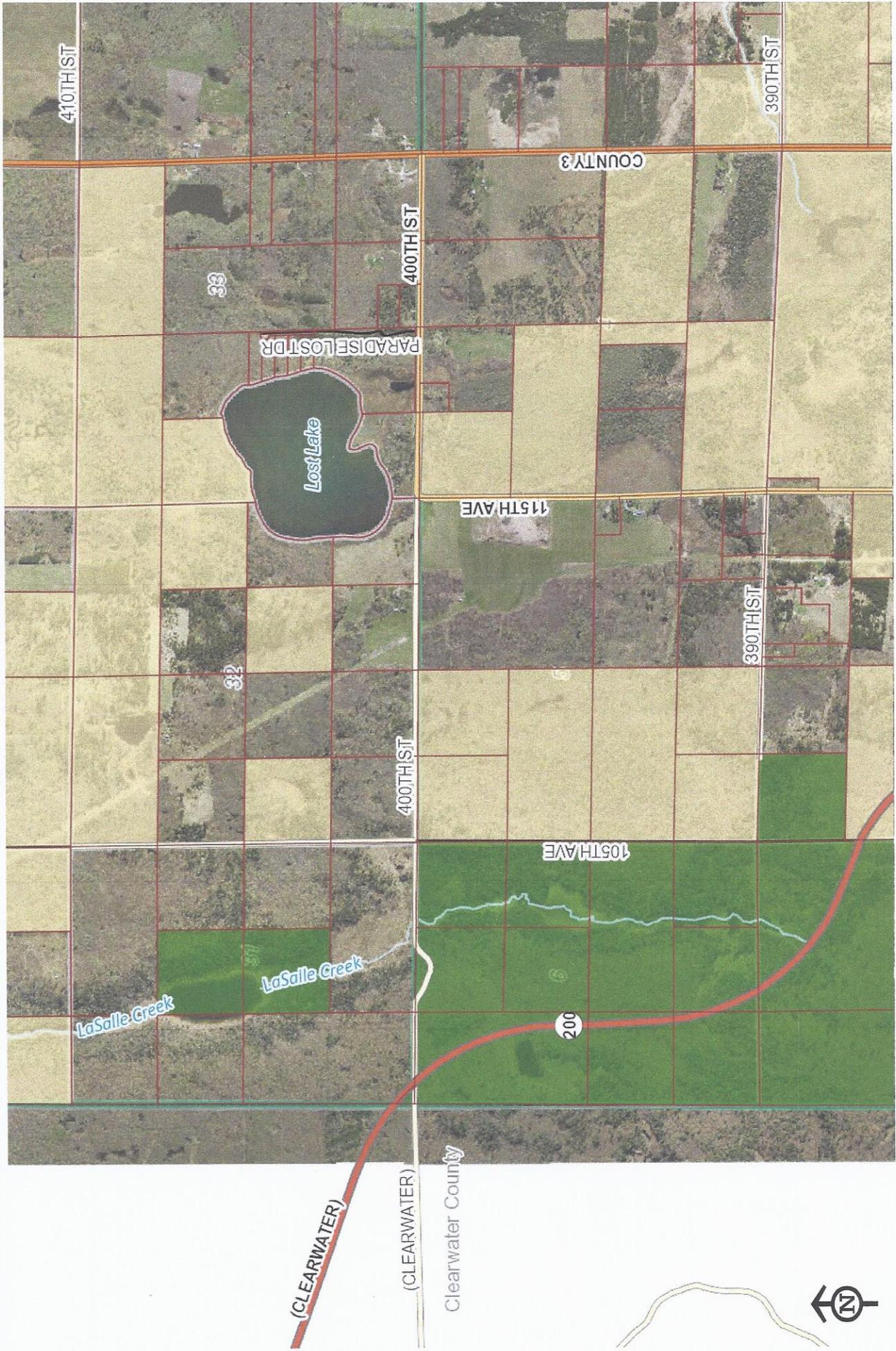


Clearwater County



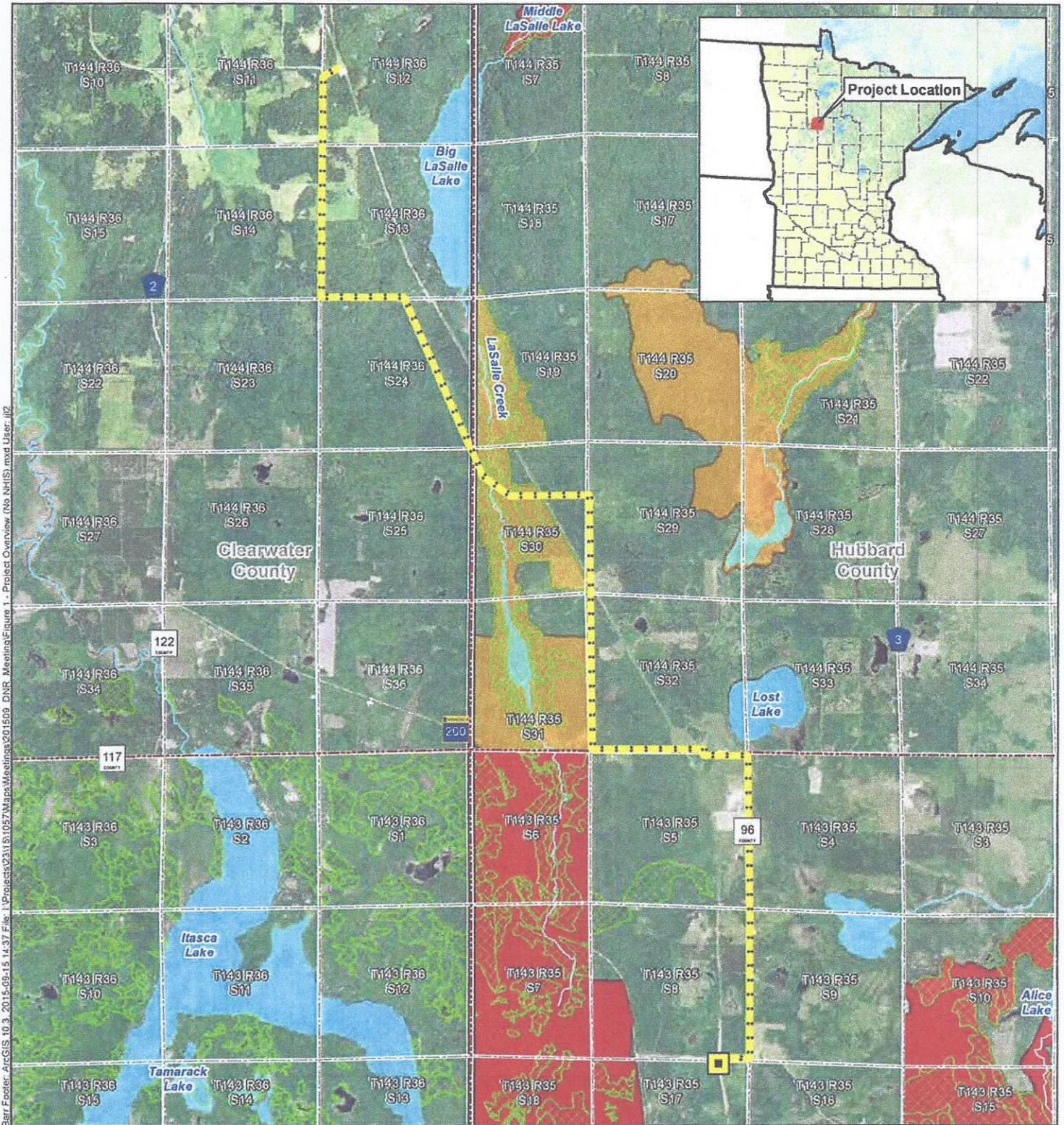
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283



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3 of 3



Barr Footer: ArcGIS 10.3, 2015-09-15 14:37 File: I:\Projects\2011\B1057\Maps\Main\MapSeries\201509\_DNR\_Mapping\Figure 1 - Project Overview (No NHD) mxd User: jz

Image Source: 2013 Farm Service Agency  
 Basemap Source: US National Park Service

- New Substation
- Anticipated Alignment
- PWI Watercourse
- PWI Basin
- PLS Section
- Township Boundary
- County Boundary
- Native Plant Community

**Sites of Biodiversity Significance**

- Outstanding
- High

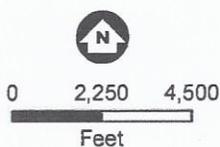


Figure 1  
 PROJECT OVERVIEW  
 Minnkota Power  
 Laporte, MN