



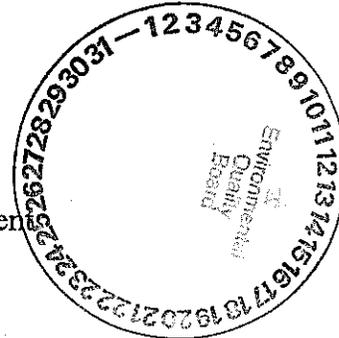
Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-40²⁵

June 6, 2005

Honorable Judge Bruce H. Johnson
Office of Administrative Hearings
100 Washington Avenue, Suite 1700
Minneapolis, MN 55401-2138

RE: High Bridge Repowering Project Environmental Assessment
EQB Docket #05-91-PPS-Xcel Energy High Bridge



Dear Judge Johnson:

The Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for the proposed Xcel Energy Repowering Project in St. Paul, Ramsey County, MN. With respect to potential impacts to natural resources, and in accordance with Minnesota Statutes §116C.575 subd.6, the DNR offers the following comments.

4.3 Natural Resources – Topography/Landform (p.25)

The project site is within the state-designated Mississippi River Critical Area Corridor District, in addition to the referenced federal MNRRA. The Mississippi River and its adjacent 54,000 acre Corridor within the seven-county Twin Cities Metropolitan Area was designated a State Critical Area on October 18, 1976, and is associated with a state-mandated program for local units of government, state agencies, and regional agencies. The boundaries of the Mississippi River Critical Area Corridor and the 1988 federal Mississippi National River and Recreation Area are the same. State agencies are required to follow the standards included in the Critical Area Executive Order 79-19 during permit regulation. These standards can be referenced at: http://files.dnr.state.mn.us/waters/watermgmt_section/critical_area/execord.pdf.

The purposes of designating the Mississippi River and its Corridor as a state Critical Area since 1976 include protecting and preserving a unique and valuable state and regional resource for the benefit of the citizens for the state, region, and nation; preventing and mitigating irreversible damage; preserving and enhancing its natural, aesthetic, cultural, and historical value for public use; protecting and preserving the river as an essential element in the national, state and regional transportation, sewer and water and recreational systems; and protecting and preserving the biological and ecological functions of the Corridor.

5.2 Land Use (p.32)

The EA correctly notes that the City of St. Paul has designated the project site as an I-2 industrial zone. The project site is also part of the River Corridor Overlay District and is currently designated as RC2 Flood Fringe District and RC-4 Urban Diversified District by the City of St. Paul Zoning Code Chapter 68.

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5.4 Visual Aesthetics (p.34)

DNR agrees that the project will improve aesthetics and views from the Critical Area with the decreased height of exhaust stacks, smaller mass of structures, neutral color of structures, and elimination of the coal storage field.

The Critical Area Executive Order standards also require retention of existing vegetation, minimization of interference with views of and from the river, and buffering, landscaping, and revegetation for new and expanded projects. Retention and establishment of trees and shrubs between the plant site and the river is a key component to buffering the structures. The required additional landscaping and revegetation of the site should be achieved with native species to accomplish additional buffering, stormwater rate reduction, habitat, and erosion control. Planting of native trees, shrubs, and plants appropriate to the ecology of the area is a win-win situation for both the protection and preservation of the Corridor as well as the owner. Instead of large areas of lawns, DNR recommends the planting of native shrubs and trees that do not compromise the clearance needed for structures.

5.8 Water Resources - Stormwater Management (p.38)

DNR recommends that the project proposer use native grasses for erosion control to increase infiltration, instead of the typical Kentucky bluegrass mixtures. Native grasses, which can be as short in height and similar in appearance as bluegrass, reduce the need for watering, fertilizing, and maintenance.

Critical Area Executive Order standards require minimization of runoff and improvement of runoff. DNR has concerns about the runoff following existing drainage patterns to existing catch basins on the eastern portion of the site that discharge directly to the Mississippi River. The large site and smaller development footprint (as shown in EA Figures 4 and 17) afford many opportunities for minimizing and improving the quality of all runoff prior to direct discharge.

Best Management Practices that prevent erosion, sedimentation, or pollution during any environmental remediation should be employed during construction and operation of the proposed project. No pollutants or sediment should be released directly into the river, or into any kind of storm water system discharging into the river.

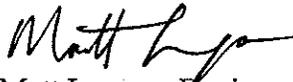
Minnesota Statutes §116C.61

Minnesota Statutes §116C.61, Subdivision 3 requires state agencies authorized to issue permits for construction of large electric power generating plants to state whether the site, and other design matters, under consideration for approval by the Environmental Quality Board will be in compliance with agency standards, rules or policies. As is noted in the EA, project construction and operation will require an amendment to DNR Well Water Appropriation Permit #69-1090 and River Water Permit #76-6347. Project construction and operation will be in compliance with DNR's standards, rules and policies.

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Thank you for the opportunity to review this document. Please contact me with any questions regarding this letter.

Sincerely,



Matt Langan, Environmental Planner
Environmental Policy & Review Unit
Division of Ecological Services
(651) 297-3359

c: Commissioner Gene Merriam, Lee Pfannmuller, Tim Bremicker, Tom Balcom, Wayne Barstad,
Sandy Fecht, Bill Storm - EQB

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