

# Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40



February 8, 2010

The Honorable Richard C. Luis  
Office of Administrative Hearings  
P.O. Box 64620, 600 North Robert Street  
St. Paul, Minnesota 55164-0620

Re: Final Environmental Impact Statement for the proposed 345kV Transmission Line from Brookings County, South Dakota to Hampton, Minnesota [PUC Docket No. ET2/TL 08-1474; Office of Administrative Hearings Docket No. 7-2500-20283-2]

Dear Judge Luis:

The Minnesota Department of Natural Resources (MDNR) has reviewed the Final Environmental Impact Statement (FEIS) for the proposed 345kV Transmission Line from Brookings County, South Dakota to Hampton, Minnesota. The DNR appreciates the review of DEIS comments included in the FEIS and offers the following further comments.

Previous comments submitted by the DNR requested information on permanent and temporary impacts to resources such as Wildlife Management Areas (WMAs), Minnesota County Biological Survey (MCBS) sites of biodiversity, public water and river crossings, native prairies, wetlands, and trails. The responses provided in the FEIS included references to very general information in the DEIS such as descriptions of the value of resources and general expected impacts if an area were to be crossed. Mitigation methods are also generally listed. Distances to resources are given in a table and the number of watercourse and Public Waters Inventory watercourse crossings is given for each route. However, this does not describe expected impacts in enough detail to evaluate specific routes and segments. It is difficult for the DNR to provide constructive input during the environmental review process about which route or segments would best protect state resources if information such as estimated acreage of permanent and temporary impacts for each location, total impact acreage for each route, and specific plans for mitigation of impacts are not provided in the Draft or Final Environmental Impact Statements. This EIS also did not identify whether impacts would be expected on existing transmission line corridors or new corridors. The above information is necessary for evaluation of impacts to natural resources and evaluation of license to cross permits.

The project applicant is encouraged to coordinate directly with the DNR through a pre-application meeting(s) concerning impacts to DNR administered lands, public waters, public water wetlands, and state-listed species prior to application for waters permits and utility licenses to cross public lands and public waters. The applicant is encouraged to further develop mitigation plans for impacts related to these resources and review these with the DNR prior to applying for any DNR permits. Specific examples of crossings discussed in the attached November, 30 2009 letter from the DNR to the Minnesota Department of Commerce, Office of Energy Security (OES) that should be discussed in pre-application meetings include the Bucks Lake, Chub Lake, and Minnesota River crossings. As described in the referenced letter, the DNR does not support a crossing of Bucks Lake due to the high concentration of species using the area for resting, roosting, feeding and nesting, and associated recreational value for the community. The DNR also has concerns regarding the construction of a transmission line through Chub Lake due the adjacent boundary of Chub Lake WMA, the presence of a Central Region Regionally Significant Ecological Area, the Chub Creek Marsh wetland complex, high usage by waterfowl and migratory bird species, and categorization of the location as an area of High Biodiversity Significance.

Further coordination is also encouraged with environmental review staff regarding temporary or permanent impacts to native prairie, Species of Special Concern plants, rock outcrops, basswood forests, and MCBS sites of biodiversity.

The DNR recommends that an independent environmental monitor be employed to evaluate compliance with permit requirements during project construction. An environmental monitor employed by the DNR or an independent firm may also be required as part of license to cross permitting.

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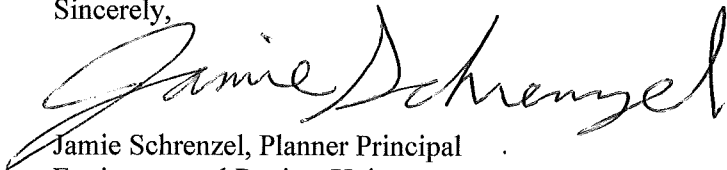


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The FEIS includes Comment Response Number 269w, which narrows the areas identified for new and existing substations. This additional information is appreciated. However, it was difficult to locate many of the areas identified with the directions provided in the FEIS response to comments. A map with substation locations would better inform the DNR review in preparation for permitting.

Thank-you for the opportunity to provide comments regarding the FEIS for the Brookings County, South Dakota to Hampton, Minnesota Transmission Line. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Jamie Schrenzel". The signature is written in a cursive style with a large, sweeping initial "J".

Jamie Schrenzel, Planner Principal  
Environmental Review Unit  
Division of Ecological Resources  
(651) 259-5115

Enclosures (1)