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March 14, 2014

Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, North Dakota 58505-0480

**RE: Minnesota Power's 250kV Direct Current Line Reroute
Siting Application for a Certificate of Corridor Compatibility and Route Permit for Minnesota
Power's 250 kV Direct Current Line Reroute, Cass County**

Dear Mr. Nitschke:

Pursuant to N.D.C.C. §§ 49-22-08 and 49-22-08.1, under the Energy Conversion and Transmission Facility Siting Act, and promulgated rules, Minnesota Power has enclosed the following:

- (1) An original and ten copies of an Application for a Certificate of Corridor Compatibility and route permit for a 250 kV Direct Current Line Reroute in Cass County, ND.
- (2) The \$2,500 filing fee for the Certificate of Site Compatibility application

If you have any questions, or need additional information, please contact me at the above listed number.

Yours truly,

David R. Moeller

Enc.
c: Dan McCourtney, Minnesota Power
Craig Kvale, Minnesota Power

***Application to the
North Dakota Public Service Commission
for a Certificate of Corridor Compatibility
and an Energy Transmission Facility Route
Permit for the
Minnesota Power
250 kV Overhead DC Line Re-route in Cass
County, ND***

***By
Minnesota Power, an operating division of ALLETE,
Inc.***

March 2014

**Application to the
North Dakota Public Service Commission For a
Certificate of Corridor Compatibility and an
Energy Transmission Facility Route Permit for the
Minnesota Power
250 kV Overhead DC Line Re-route in Cass County, ND**

March 2014

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1.0 Introduction and Waiver Request

1.1 Introduction

Minnesota Power (MP), an operating division of ALLETE, Inc., submits this combined Application for a Certificate of Corridor Compatibility (Corridor Certificate) and a Route Permit to reroute a 0.7 mile long segment of its 465-mile, 250kV direct-current transmission line (DC Line) located in Cass County, North Dakota. See Figure 1-1. MP provides retail electric service to northeastern Minnesota and wholesale service to 16 municipal customers in Minnesota and two private utilities in Wisconsin. MP has no retail customers in North Dakota.

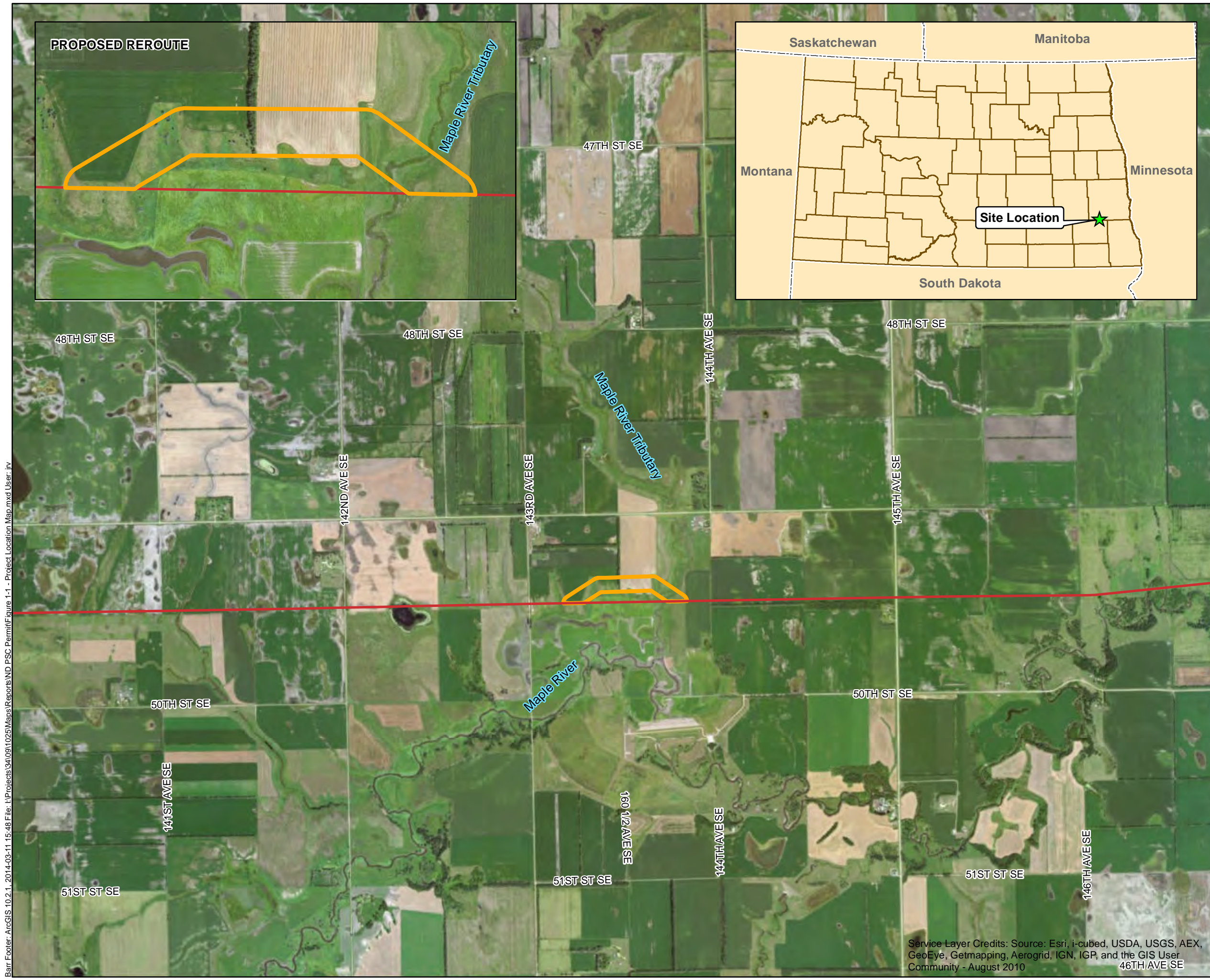
In 2009, MP purchased a 465-mile 250kV DC Line located between Duluth, Minnesota, and Center, North Dakota, to transport wind energy from its Bison Wind Energy Center. As part of that purchase, MP and Square Butte Electric Cooperative filed a joint application with the North Dakota Public Service Commission (PSC) to transfer transmission facility permits and certificates (Case No. PU-09-631). The PSC issued an order dated October 28, 2009 approving the joint application.

The proposed reroute is needed to move the existing structures out of a Southeast Cass Water Resource District flood control basin. In addition to being in the best interest of structural integrity, the reroute would provide upland access to allow for maintenance during flood conditions on the Maple River and comply with North American Electric Reliability Corporation standards. The reroute would tie back into existing MP facilities and continue to provide utility service.

Construction is anticipated to take place in Summer and Fall of 2014.

1.2 Compliance with the Energy Conversion and Transmission Facility Siting Act

The proposed 0.7 mile transmission line reroute requires a Corridor Certificate and a Route Permit under the North Dakota Energy Conversion and Transmission Facility Siting Act. The siting of a transmission facility is to be made in an orderly manner compatible with environmental preservation and the efficient use of resources (North Dakota Century Code [NDCC] 49-22-02). MP has considered statutory and regulatory exclusion areas, avoidance areas, the selection criteria, and the policy criteria in project design.



Existing Line
Proposed Reroute



Miles
0 0.5 1



Figure 1-1

PROJECT LOCATION MAP
Minnesota Power
Cass County, ND

Service Layer Credits: Source: Esri, i-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community - August 2010

Barr Footer: ArcGIS 10.2.1, 2014-03-11 15:48 File: I:\Projects\3A\09\1025\Maps\Reports\ND_PSC_Permit\Figure 1-1 - Project Location Map.mxd User: iv

1.3 Combined Corridor Certificate and Route Permit Application

The proposed project is 0.7 miles long, and the location of the new structures is dictated largely by the availability of nearby dry upland areas and efforts to minimize impacts to adjacent farming operations. Therefore, MP is requesting a 600-foot wide corridor. As a result, the information required for the Route Permit application is nearly the same as that required for the Corridor Certificate application, except that the Route Permit application also requires a discussion of the factors listed in NDCC Sections 49-22-08.1(e) and (f). Therefore, to make this filing less repetitive, the information required for Route Permit application and Certificate of Corridor Compatibility application is combined. Any information required for the Route Permit application only is indicated where applicable.

1.4 Waiver of Procedures and Time Schedules

In addition to the Certificate of Corridor Compatibility and Route Permit application, MP submits this Application for a Waiver of Procedures and Time Schedules. MP requests that the PSC, pursuant to NDCC Section 49-22-07.2, waive the following requirements:

1. That the PSC not hold a hearing for this docket unless one is requested in writing after the PSC issues a notice of Opportunity for Hearing pursuant to NDCC Section 49-22-07.2. The PSC recently took a similar action for another MP project on the DC Line in PU-13-103.
2. That the PSC shorten the three-month period specified in NDCC Section 49-22-08(5) and the six-month period specified in NDCC Section 49-22-08.1(5).
3. That the PSC waive the requirements of NDCC Sections 49-22-08 and 49-22-08.1 insofar as these sections may require the separate filing of applications for a Certificate of Corridor Compatibility and a Route Permit, and insofar as they require the publication of notices of filing applications.
4. That the PSC waive the requirement of NDAC Section 69-06-04-02(1) that the corridor width be at least ten percent of its length and instead allow a 600-foot corridor width.
5. That the PSC waive requirements for Mylar maps and stereo-pair aerial photographs as set forth in the PSC's Application Guidelines for a Certificate of Corridor Compatibility and a Route Permit. Geographic Information System (GIS) maps are provided in the Application.

The PSC's Application Guidelines for Waiver of Procedures and Time Schedules require a facility description, need for, cost of, and justification for the request for waiver, together with evidence that the Project will produce minimal adverse effects. As demonstrated in the Application, and as summarized

below, MP's Waiver Request and the issuance of a Certificate of Corridor Compatibility and Route Permit is justified, as the proposed facility is of such design, location, and purpose that it will produce minimal adverse effects.

1.4.1 Description

The project segment proposed for relocation consists of 0.7 miles of the DC Line approximately 530 feet north of its existing alignment. No capacity upgrades would be made as part of the relocation. The relocated segment would continue to operate as a +/- 250kV DC overhead line.

1.4.2 Need

The proposed reroute is needed to move MP's existing transmission structures out of a Southeast Cass Water Resource District flood control basin. In addition to being in the best interest of structural integrity, the reroute would provide upland access to allow for maintenance of the transmission line during flood conditions of the Maple River and comply with North American Electric Reliability Corporation standards. The reroute would tie back into existing MP facilities and continue to provide utility service.

1.4.3 Cost

The DC Line reroute is estimated to cost approximately \$500,000.

1.4.4 Justification for Waiver

Pursuant to NDCC Section 49-22-07.2, MP requests that "[t]he commission shall not be required to hold a public hearing on an application for the transfer of a certificate or a permit, or an application for a waiver of procedures and time schedules, but shall publish a notice of opportunity for a public hearing in the official newspaper of each county in which any portion of the facility or the proposed site, corridor, or route is located. If requested by any interested person and good cause has been shown therefor, the commission shall hold a public hearing."

MP specifically seeks a waiver from holding a hearing in this Docket unless one is requested in writing after the Commission issues a Notice of Opportunity for Hearing. Such a procedure is consistent with the Cenex Pipeline reroute in Case No. PU-2242-02-561 and a separate MP reroute of the DC Line approved by the PSC in Case No. PU-13-103. A waiver of a hearing is also consistent with the limited scope and impact of this project which impacts only two landowners for which MP is working acquire voluntary agreement regarding easement options. MP commits to providing any information the Commission requires in order to reach a decision whether MP can reconstruct and reroute a 0.7 mile long segment of the existing DC Line.

The project is a short, 0.7 mile long reroute of an existing 465-mile long transmission line. Waivers of timelines and procedures are needed in order to prevent potentially significant delays. MP anticipates beginning construction in Summer 2014 and also needs to have the transmission line completed and energized in Fall 2014 to be in-service on schedule.

NDCC Section 49-22-07.2 provides that the PSC may waive procedures and time schedules upon a finding that “the proposed facility is of such length, design, location, or purpose that it will produce minimal adverse effects.” Based upon the thorough investigation and analysis set forth in the Application, waivers are appropriate because the proposed facility will produce minimal adverse impacts.

In determining whether the proposed facility will result in adverse impacts on the environment, MP evaluated the transmission line using the criteria set forth in the Act, the Rules, and the PSC’s Guidelines for Energy Conversion and Transmission Facility Siting (Guidelines). MP evaluated the impacts of the transmission line considering the siting criteria laid out in NDAC 69-06-08 and the factors to be considered in NDCC Section 49-22-09. Impacts associated with the transmission line are summarized in Section 6 of the Application. Based upon this evaluation and the factors set forth in the Energy Conversion and Transmission Facility Siting Act and PSC Guidelines, it is clear that the proposed facility will produce minimal adverse impacts.

State and federal agencies were consulted to provide input on potential impacts of the proposed project and, in general, concluded that the proposed facility would produce minimal adverse effects.

MP’s proposal takes into consideration all state and federal agency concerns and thereby further mitigates any adverse effects associated with the proposed facilities. The designated state agencies and officers listed in NDAC 69-06-01-05 were notified about the proposed project. MP will continue to work with the agencies to address any concerns that may arise.

MP submits that it has taken all feasible and prudent actions to minimize and mitigate to the greatest extent possible all known or potential adverse impacts. As a result, the proposed project will produce minimal adverse effects. Accordingly, MP respectfully requests that the PSC grant the requested waivers.

2.0 Certificate of Corridor Compatibility and Route Permit

2.1 Certificate of Corridor Compatibility

The North Dakota Energy Conservation and Transmission Facility Siting Act requires an Application for a Certificate of Corridor Compatibility to meet criteria established in NDCC 49-22. According to NDCC 49-22-02, energy transmission facilities are to be routed with consideration given to environmental preservation and efficient use of resources.

MP has considered exclusion areas, avoidance areas, selection criteria, and policy criteria as described in Article 69-06 of the NDAC in the design of this Project. These items are addressed in this application. Table 1 provides the list of information requested in the North Dakota PSC application guidelines for a Certificate of Corridor Compatibility (November, 1979) and the section of the application in which each issue is addressed.

Table 1 Corridor Certificate Completion Checklist

State Authority	Description	Section Addressed
NDCC Chapter 49-22	PSC Guidelines: Energy Conversion and Transmission Facility Siting	1.2, 1.3, 1.4, 2.1, 2.2, 5.2
NDAC Chapter 69-06-05	Transmission Facility Permit	1.4, 2.2, 2.4
Section A	Description	
1.	Type of facility proposed.	2.3, 5.1
2.	Purpose of the facility.	3.0
3.	The technology to be deployed.	5.1, 5.3
4.	The type of product to be transmitted.	2.3, 5.1
5.	The source of the produce to be transmitted.	N/A
6.	The final destination of the produce to be transmitted.	N/A
7.	The proposed size and design and any alternate size or design that was considered, including:	2.3, 5.1, 5.3
a.	The width of right-of-way.	5.1
b.	The approximate length of facility.	2.3, 5.1
c.	The estimated span length for electric facilities.	5.1
d.	The anticipated type of structure for electric facilities.	5.1
e.	The voltage for electric facilities.	2.3, 5.1
f.	The requirement for and general location of any new associated facilities.	N/A

State Authority	Description	Section Addressed
g.	The estimated distance between surface structures for pipeline facilities.	N/A
h.	The pipe size for pipeline facilities.	N/A
i.	The maximum design operating pressure and temperature for pipeline facilities.	N/A
j.	The maximum design flow rate for pipeline facilities.	N/A
k.	The number and general location of compressor or pumping stations.	N/A
Section B	Time Schedule	
1.	Obtaining the certification of corridor compatibility.	2.4
2.	Completing right-of-way acquisition.	5.2
3.	Starting construction.	2.4
4.	Completing construction.	2.4
5.	Testing operations.	N/A
6.	Commencing operations.	2.4
Section B	Studies	
	Provide a copy of each evaluative studies or assessment of the environmental impact of the proposed facility submitted to agencies listed in Section 69-06-01-05 of the NDAC and each response received.	Appendix A
Section C	Need for Facility	
1.	An analysis of the need for the proposed facility based on present and projected demand for the product transmitted, including any recent studies supporting the analysis of the need.	3.0
2.	A description of any feasible alternative methods of serving the need.	3.0
Section D	Location	
1.	Selection of appropriate corridor width. The width of a corridor must be at least 10 percent of its length but not less than one mile or greater than six miles unless another appropriate width is determined by the PSC.	4.1
2.	Select a study area, which includes a proposed corridor of sufficient width to enable the commission to evaluate the factors addressed in NDCC 49-22-09.	4.1, Figure 1-1
3.	Discuss the utility's policies and commitments to limit the environmental impact of its facilities, including copies of board resolutions and management directives	1.2
4.	Identify and map the criteria that led to the proposed route location within the designated corridor, including:	4.0
a.	Exclusion areas	4.2.1, Table 3
b.	Avoidance areas	4.2.2, Table 4
c.	Selection criteria	4.2.3, Table 5
d.	Policy criteria	4.2.4, Table 6
e.	Design and construction limitations	4.2.5
f.	Economic considerations	4.2.6
5.	Discussion of the relative value of each criteria and how the applicant selected the proposed corridor location, giving consideration to all criteria and how the location, construction, and operation of the facility will affect each criteria.	4.0

State Authority	Description	Section Addressed
6.	Discussion of the general mitigative measures that the applicant will take to minimize adverse impacts that result from a route location in a proposed corridor and the construction and operation of the facility.	6.17, 7.11, Table 8
7.	Qualifications of each person involved in the corridor location study.	11.0
8.	Maps	
a.	Map the criteria within the study area showing the proposed facility location.	N/A
NDCC Chapter 49-22-09	Factors to be considered in evaluating applications and designation of sites, corridors, and routes	
1.	Available research and investigations relating to the effects of the location, construction, and operation of the proposed facility on public health and welfare, natural resources, and the environment.	7.1
2.	The effects of new energy conversion and transmission technologies and systems designed to minimize adverse environmental effects.	7.2
3.	The potential for beneficial uses of waste energy from a proposed energy conversion facility.	7.3
4.	Adverse direct and indirect environmental effects which cannot be avoided should the proposed site or route be designated.	7.4
5.	Alternatives to the proposed site, corridor or route which are developed during the hearing process and which minimize adverse effects.	7.5
6.	Irreversible and irretrievable commitments of natural resources should the proposed site, corridor, or route be designated.	6.18, 7.6
7.	The direct and indirect economic impacts of the proposed facility.	6.9.1, 7.7
8.	Existing plans of the state, local government, and private entities for other developments on or in the vicinity of the proposed site, corridor, or route.	7.8
9.	The effect of the proposed site or route on existing scenic areas, historic sites and structures, and paleontological or archaeological sites.	6.7, 7.9
10.	The effect of the proposed site or route on areas which are unique because of biological wealth or because they are habitats for rare and endangered species.	7.10
11.	Problems raised by federal agencies, other state agencies, and local entities.	9.1

2.2 Route Permit Application

Table 2 provides the list of information requested in the PSC application guidelines for a Route Permit (November, 1979) and the section of the application in which each issue is addressed.

Information regarding easements for transmission lines per NDCC 49-22-08.1(f) is also referenced in this portion of the Application.

Table 2 Route Permit Completion Checklist

State Authority	Description	Section Addressed
Chapter 49-22	PSC Guidelines: Energy Conversion and Transmission Facility Siting	1.2, 1.3, 1.4, 2.1, 2.2, 5.2
Section A	Description	
1.	Type: Describe the type of transmission facility proposed.	2.3, 5.1
2.	Product: Describe the product or products to be transmitted.	2.3, 5.1
3.	Size and Design: Provide a general description of the proposed size and design, and any alternate size or design, which was considered. Provide one (1) copy of the design data report, separate from the application, for the proposed facility and any associated facilities.	2.3, 5.1, 5.3
4.	Time Schedule: Provide the anticipated time schedule for the accomplishment of major events including, at a minimum, the following:	2.4
a.	Route Permit;	2.4
b.	Right-of-way (ROW) acquisition complete;	5.2
c.	Construction start date;	2.4
d.	Construction complete;	2.4
e.	Test operations; and	N/A
h.	In-service date.	2.4
Section B	Studies	
	Provide a copy of any studies or assessments of the environmental impact of the proposed facility submitted to any federal, regional, state, or local agency.	Appendix A
Section C	Need for Facility	
1.	An analysis of the need for the proposed facility based on present and projected demand for the product to be transmitted by the facility, including the most recent system studies supporting the analysis of the need.	3.0
2.	A description of any feasible alternative methods of serving the need.	3.0
3.	A statement justifying any deviations from the most recent Ten-Year Plan which the proposed facility may present.	N/A
Section D	Location	4.0
1.	Discuss the utility's policies and commitments to limit the environmental impact of its facilities, including copies of board resolutions and management directives.	1.2
2.	Discuss the factors listed in Section 49-22-09, NDCC to aid the PSC's evaluation of the proposed route.	4.1
3.	Identify and map the criteria that led to the proposed route location within the designated corridor.	4.0
4.	Discuss in detail the relative value of each criteria and how the location, construction, and operation of the facility will affect each criteria.	4.0

State Authority	Description	Section Addressed
5.	The criteria to be evaluated shall include at a minimum all of the following which are within the designated corridor:	4.2
a.	Exclusion areas;	4.2.1
b.	Avoidance areas;	4.2.2
c.	Selection criteria;	4.2.3
d.	Policy criteria;	4.2.4
e.	Design and construction limitations; and	4.2.5
f.	Economic considerations.	4.2.6
6.	Discuss the mitigative measures that will be taken to minimize adverse impacts which result from the location, construction, and operation of the proposed facility.	6.17, 7.11, Table 8
7.	List the qualifications of the people in the various disciplines that contributed to the facility route location study.	11.0
8.	Maps	
a.	Map the criteria within the designated corridor showing the proposed route and location of any new associated facilities. Several different criteria may be shown on each map, depending on the map scale and the density and nature of the criteria. Minimum map scale shall be ½ inch = 1 mile. All maps shall be at the same scale unless otherwise specified.	N/A
b.	Furnish one (1) set of Mylar maps, separate from the application, of the same scale as the criteria maps and showing the same basic features as the criteria maps, including the designated corridor, but not the proposed route or location of any new associated facilities. Note: A waiver for this requirement has been requested.	N/A
c.	Furnish one (1) set of uncontrolled 9 x 9-inch stereo-pair aerial photographs, separate from the application, with acceptable resolution showing the designated corridor, proposed route and location of any new associated facilities, and Section, Township and Range numbers, at a scale of 1 inch = 2000 feet, together with a flight map at a scale of ½ inch = 1 mile showing each flight line and the beginning and ending photo number of each flight line. Photo mosaic strip maps will also be acceptable. If the applicant can demonstrate that because of the limited size and scope of the Project, aerial photographs would not be practical, this requirement may be waived.	N/A
NDCC Chapter 49-22-09	Factors to be considered in evaluating applications and designation of sites, corridors, and routes	
1.	Available research and investigations relating to the effects of the location, construction, and operation of the proposed facility on public health and welfare, natural resources, and the environment.	7.1
2.	The effects of new energy conversion and transmission technologies and systems designed to minimize adverse environmental effects.	7.2
3.	The potential for beneficial uses of waste energy from a proposed energy conversion facility	7.3
4.	Adverse direct and indirect environmental effects which cannot be avoided should the proposed site or route be designated.	7.4
5.	Alternatives to the proposed site, corridor, or route which are developed during the hearing process and which minimize adverse effects.	7.5

State Authority	Description	Section Addressed
6.	Irreversible and ir retrievable commitments of natural resources should the proposed site, corridor, or route be designated.	6.18, 7.6
7.	The direct and indirect economic impacts of the proposed facility	6.9.1, 7.7
8.	Existing plans of the state, local government, and private entities for other developments at or in the vicinity of the proposed site, corridor, or route.	7.8
9.	The effect of the proposed site or route on existing scenic areas, historic sites and structures, and paleontological or archaeological sites.	6.7, 7.9
10.	The effect of the proposed site or route on areas which are unique because of biological wealth or because they are habitats for rare and endangered species	7.10
11.	Issues raised by federal agencies, other state agencies, and local entities	9.1

2.3 Project Summary

MP is proposing to relocate 0.7 mile of the DC Line. Four structures would be shifted approximately 530 feet north of the existing alignment, and no capacity upgrades are included.

The existing aluminum mast structures would be removed and replaced with tubular weathering steel, self-supporting, monopole tangent structures and dual-pole angle structures. Design, construction, and operation of the transmission line would be completed in accordance with the National Electric Safety Code (NESC) standards.

2.4 Project Schedule

Once all pre-construction permits and approvals have been obtained, construction of the proposed project is anticipated to take place in Summer and Fall 2014. The proposed project is scheduled as follows:

- **Certificate of Corridor Compatibility:** MP is seeking a Certificate of Corridor Compatibility by Spring 2014.
- **Route Permit Application:** MP is seeking a waiver of PSC procedures to allow joint and simultaneous filing of its applications for a Certificate of Corridor Compatibility and Route Permit.
- **Route Permit:** MP is seeking a Route Permit by Spring 2014.
- **Construction Start and Completion Dates:** Construction is anticipated to start in Summer 2014 and be completed by Fall 2014.
- **In-Service Date:** The rerouted segment is anticipated to be in-service immediately following relocation activities, in Fall 2014.

3.0 Need for Project

The proposed reroute is needed to move the existing structures out of a Southeast Cass Water Resource District flood basin. In addition to being in the best interest of structural integrity, the reroute would provide upland access to allow for maintenance during flood conditions of the Maple River. The reroute would tie back into existing MP facilities and continue to provide utility service. If the project is not built, the structures would remain in the flood basin, making maintenance during flood conditions impossible.

4.0 Location and Evaluation Criteria

4.1 Study Area

MP has defined its study area as a 600-foot wide corridor centered on the preliminary alignment of the rerouted segment. See Figure 1-1. The new alignment and study area have been located to avoid wetlands while minimizing effects to any other nearby environmental resources.

4.2 Criteria to be Evaluated

The applicable regulations include an evaluation of exclusion areas, avoidance areas, as well as selection criteria and policy criteria.

4.2.1 Exclusion Areas

Per Chapter 69-06-08-01 of the NDAC, certain geographical areas shall be excluded from transmission facility route consideration, as shown in Table 3.

Table 3 Summary of Exclusion Areas

Exclusion Area	Present within Study Area?	Proposed Buffer	Section Addressed
Designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas.	None	N/A	6.7, 7.9
Designed or registered state: parks; historic sites; monuments; historical markers; archaeological sites; and nature preserves.	None	N/A	6.7, 7.9
County parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions.	None	N/A	6.8
Areas critical to the life stages of threatened or endangered animal or plant species.	None	N/A	7.10
Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged.	None	N/A	6.15, 6.16
Areas within 1,200 feet of the geographic center of an intercontinental ballistic missile (ICBM) launch or launch control facility.	None	N/A	N/A
Areas within 30 feet of either side of a direct line between ICBM launch or launch control facilities to avoid microwave interference.	None	N/A	N/A

4.2.2 Avoidance Areas

Per Chapter 69-06-08-02 of the NDAC and as shown in Table 4, certain geographical areas shall not be approved for use in the routing of a transmission facility unless it has been shown that, under the

circumstances, there is not reasonable alternative. In determining whether an avoidance area should be designated for a facility, the PSC may consider, among other things, the proposed management of adverse impacts; the orderly siting of facilities; system reliability and integrity; the efficient use of resources; and alternative routes. In addition, a buffer zone shall be implemented around these areas to protect their integrity.

Table 4 Summary of Avoidance Areas

Avoidance Area	Present within Study Area?	Proposed Buffer	Section Addressed
Designated or registered national: historic districts, wildlife areas, wild, scenic, or recreational rivers; wildlife refuges; and grasslands.	None	N/A	6.7, 6.13, 7.9
Designated or registered state: wild, scenic, or recreational rivers; game refuges; game management areas; forests; forest management lands; and grasslands.	None	N/A	6.7, 7.9
Historical resources which are not specifically designated as exclusion or avoidance areas.	None	N/A	6.7, 7.9
Areas which are geologically unstable.	None	N/A	6.11
Within 500 feet of a residence, school, or place of business.	None	N/A	4.2.3
Reservoirs or municipal water supplies.	None	N/A	6.3
Water sources for organized rural water districts.	None	N/A	6.3
Irrigated land.	None	N/A	4.2.3
Areas of recreational significance which are not designated as exclusion areas.	None	N/A	6.8

4.2.3 Selection Criteria

Per Chapter 69-06-08-02 of the NDAC, a corridor or route shall be approved in an area only when the applicant has demonstrated to the PSC that any significant adverse effects resulting from the location, construction, and maintenance of the facility will be at an acceptable minimum or that those effects will be managed and maintained at an acceptable minimum. Exclusion and avoidance areas, along with these selection criteria, were evaluated and taken into account when determining the alignments of the re-routed DC Line, as shown in Table 5.

Table 5 Summary of Selection Criteria

Selection Criteria	Potential Adverse Effects	Section Addressed
The impact upon agriculture:		
Agricultural production.	Approximately 0.01 acres of farmland would be permanently converted by the relocation of the four power line structures. The remainder of land in the study area would remain available for farming upon construction completion.	6.2
Family farms and ranches.	Construction of the proposed project will result in the conversion of approximately 0.01 acres of farmland from present use to use as an energy transmission facility. The nearest rural residence is approximately 0.36 miles northeast of the proposed project. No adverse impacts are anticipated.	6.2
Land which the owner can demonstrate has soil, topography, drainage, and an available water supply that cause the land to be economically suitable for irrigation	No impacted owners have expressed concerns over land that is economically suitable for irrigation. No adverse impacts are anticipated	N/A
Surface drainage patterns and groundwater flow patterns.	No impacts are anticipated to surface drainage or groundwater flow patterns.	6.11, 6.12
The Impact Upon:		
Sound-sensitive land uses.	The nearest residence is approximately 0.36 miles northeast of the proposed project, and there are no other sound-sensitive land uses within the area. The proposed project is not anticipated to result in long-term changes to the area's noise levels.	6.5
The visual effect on the adjacent area.	The proposed project would result in construction of overhead electric line; however, this would be a replacement to an existing overhead electric line in very close proximity to the rerouted location; therefore, changes in the visual landscape of the area would be minor.	6.6
Extractive and storage resources.	The proposed project is not anticipated to impact extractive and storage resources.	N/A
Wetlands, woodlands, and wooded areas.	The proposed project would require removal of existing electric structures from areas of standing water; however, there are no U.S. Fish and Wildlife Service (USFWS) easement wetlands in the vicinity of the project and additional considerations for these resources would not be required.	6.13
Radio and television reception and other communication or electronic control facilities.	Given the proximity of the rerouted line segment to the existing line segment, disruptions in radio/television reception and other communications or electronic control facilities is not anticipated.	6.3
Human health and safety.	No adverse impacts to human health and safety are anticipated.	6.4
Plant life.	Approximately 0.01 acres of farmland would be converted by the relocation of the four power line structures. The land where the relocated structures would be placed is active farmland.	6.10, 6.14

4.2.4 Policy Criteria

Per Chapter 69-06-08-02 of the NDAC, the PSC may give preference to an applicant that will maximize benefits through the adoption of up to 10 criteria related to the applicant’s policies and practices, as shown in Table 6.

Table 6 Summary of Policy Criteria

Policy Criteria	Applicant’s Policies and Practices	Section Addressed
Location and design.	The project has been designed to avoid placement of structures in wetlands and in accordance with NAER standards.	2.3, 5.3
Training and utilization of available labor in this state for the general and specialized skills required.	Skilled and trained labor from North Dakota would be used to the extent possible.	N/A
Economies of construction and operation.	Local contractors would be utilized to the extent possible	N/A
Use of citizen coordinating committees.	MP would coordinate directly with affected landowners.	5.2
A commitment of a portion of the transmitted product for use in this state.	Power transmitted through the proposed project would be available to MP’s service area, including North Dakota.	N/A
Labor relations.	No impacts to labor relations are anticipated.	N/A
The coordination of facilities.	The proposed project would tie into the existing MP overhead line.	3.0, 5.1
Monitoring of impacts.	Based on the impact assessment included in Section 5 of this document, adverse environmental impacts are not anticipated. Mitigation and associated monitoring would not be required.	7.11
Utilization of existing and proposed rights of ways and corridors.	Construction within the existing utility easement is not consistent with the purpose and need of the project, which is to remove the existing structures from standing water within the existing utility easement.	3.0
Other existing or proposed transmission facilities.	Upon completion, the rerouted project segment would tie into the existing MP DC Line.	3.0, 5.1

4.2.5 Design and Construction Limitations

In general, there were two design and construction limitations that were considered in the development of this project: moving the existing structures out of a Southeast Cass Water Resource District flood basin and into upland areas and landowner relations. Both of these objectives have been accomplished by the proposed reroute alignment.

4.2.6 Economic Considerations

This project is proposed to maintain the reliability of MP's electrical network and enable maintenance needs by relocating utility structures to upland areas. As such, economic considerations were not considerable factors in the development of this project.

5.0 Description of Proposed Project, Easement Acquisition, Construction, and Reclamation

5.1 Project Description

MP is proposing to relocate 0.7 mile of the DC Line approximately 530 feet north of the existing alignment, and no capacity upgrades are included. The relocated segment would continue to operate as a +/- 250kV DC Line.

The existing aluminum mast towers would be removed and replaced with approximately four-foot diameter tubular weathering steel, self-supporting monopole tangent structures and dual-pole angle structures. Four structures would be installed on a new alignment as part of the project. The structures would range from approximately 70 to 100 feet tall and have an average span of 715 feet between each. All structures would be located within MP's easement. Design, construction, and operation of the transmission line would be completed in accordance with the National Electric Safety Code (NESC) standards.

5.2 Utility Easement Acquisition

Acquisition of the utility easement will be completed in accordance with current North Dakota State law. MP will coordinate with affected landowners and negotiate appropriate compensation as required by NDCC Section 49-22-08.1(f)(1).

The proposed project primarily crosses agricultural fields separated by one tree row. Tall-growing trees may need to be cleared prior to construction in order to reduce potential for future conflicts with the overhead DC line. A tree and shrub survey will be completed and submitted in the Supplemental Application to the PSC.

5.3 Construction Methodology

After receiving all regulatory approvals and required notices, construction would commence once utility easements have been acquired and cleared. Construction components would be delivered to the site, where they would be assembled and erected using mobile cranes or other appropriate construction equipment. The realigned structures would be founded on cast-in-place concrete piers

All concrete foundations are anticipated to be placed with an approximate two-foot reveal above existing grade levels. Minor grading may be required to provide level, stable working surfaces for

construction activities. Once construction is complete, the leveled areas would be re-graded to match original contours to the extent practicable.

Most of the construction activity would be limited to the area immediately around each structure. Each structure would require approximately 100 square feet of land to be converted from its current use and become part of the utility network, resulting in approximately 0.01 acre of permanent land use impact. Access paths and a construction work area, anticipated to be approximately a 100-foot radius, around each structure would be required; however, impacts within these areas would be temporary in nature and only for the duration of construction. Line stringing would occur once the structures are erected.

The proposed project has been designed, constructed, operated, and maintained to meet or surpass all relevant state codes, National Electric Safety Code (NESC), applicable Avian Power Line Interaction Committee (APLIC) raptor-safe design standards, and MP company standards. Appropriate safety standards would be met for construction, operation, and maintenance of the facility.

5.4 Restoration

Construction related ground disturbance would be limited to the immediate work area and appropriate erosion control measures would be employed. Upon completion of construction, any generated debris would be removed and disposed, temporary staging would be dismantled, and areas of significant rutting would be re-graded to match original land contours to the extent practicable. Since the area is presently being farmed, it would remain available for farming upon completion of construction rather than being revegetated with native grassland species.

5.5 Maintenance

MP will periodically use the easement to perform inspections, routine maintenance, and repairs over the life of the transmission line.

6.0 Environmental Analysis

This section describes the existing conditions within the study area. The existing conditions, or affected environment, are the baseline conditions that may be affected by the proposed project. This section discusses the direct environmental impacts of the proposed project. Indirect impacts are identified in the resource discussions where applicable. Mitigation measures, such as best management practices (BMPs), which will avoid, minimize, or mitigate impacts are discussed where appropriate.

The proposed project is located approximately 4.25 miles east of County Road 38 and 4.5 miles north of State Highway 46. The landscape in the vicinity of the project consists of gently rolling hills with multiple isolated wetland basins. The nearest town, Alice, has a population of 40 and is located 5.5 miles north of the project. With a population of 870, Enderlin is the nearest town that offers community services and is located approximately 8.2 miles southwest of the project.

6.1 Demographics

The proposed project is located in a rural portion of Cass County in southeastern North Dakota. Major employment industries in Cass County include: educational services, health care, and social assistance; retail; professional, scientific, management, administrative, and waste management services; and manufacturing. Unemployment and the percentage of individuals below the poverty level in Cass County are similar to statewide levels; however, per capita income is slightly higher than statewide levels, as shown in Table 7.

Table 7 Demographic Trends

Location	Population in 2010	Unemployment	Per Capita Income (dollar)	Individuals Below Poverty Level
Cass County	149,778	3.1%	\$29,518	13.2%
Statewide	672,591	2.4%	\$27,305	12.3%

6.1.1 Demographic Impacts/Mitigation

The proposed project would not result in changes to income or population trends in Cass County. Therefore, demographic impacts are not anticipated and mitigation would not be required.

6.2 Land Use

The proposed project is located in a rural setting used primarily for active agriculture production

6.2.1 Land Use Impacts/Mitigation

The proposed project would result in the conversion of approximately 0.01 acres of land from farmland to electrical utility use through installation of structures to support overhead electric lines. The remainder of the study area would remain available for agriculture use upon construction completion. Highland Township in Cass County administers the zoning requirements where the project is located. The Township's approval of the project is included in Appendix B.

6.3 Public Services

Electrical Services

MP does not provide retail electric service in North Dakota. Electric service in the area is provided by a variety of providers, including Otter Tail Power and Cass County Electric Cooperative.

Local Services

The proposed project is located in a rural part of North Dakota mainly composed of cultivated land. Several small towns are located within 20 miles of the project, although none are located immediately adjacent to the study area. Local residents receive sewer, water, and utility services, as well as recreational opportunities such as parks and services such as hotels and restaurants. The Sanford Health Enderlin Clinic, located approximately 8.2 miles southwest of the project in the town of Enderlin, is the closest facility offering community medical services. Enderlin also hosts a school system providing Kindergarten through 12th Grade.

Roads

Major roadways near the project include County Road 38, located 4.25 miles west of the project and State Highway 46, located 4.5 miles to the south. Other roadways in the vicinity of the project range from well-maintained county and township gravel roadways to very low or minimum maintenance roadways and dirt trails.

Telephone, Fiber Optic, and Microwave Communications

Telephone, fiber optic, and radio communication services are provided to communities surrounding the project.

Traffic

Traffic counts have not been conducted for roadways in the project's immediate vicinity due to the rural, limited use of these roadways. It is anticipated that most of the traffic loads on the roadways near the vicinity of the project study area can be attributed to local agricultural traffic and commuting from rural residences.

Water Supply

The Cass Rural Water District supplies rural water service to many locations throughout Cass County. Much of the rural water infrastructure occurs within existing road rights-of-way. It is also common for rural residents in the area to utilize private wells for alternative uses, such as agriculture. No sole source aquifers occur in the project's study area.

6.3.1 Public Services Impact/Mitigation

Electrical Services

The project would not disrupt utility service in the vicinity of the proposed project; however, overhead electric structures placed in standing water would require increased maintenance over time. The proposed project would improve the reliability of the area's electrical network by relocating structures to upland areas and out of standing water. Mitigation would not be required.

Local Services

The proposed project would not impact local services; mitigation would not be required.

Roads

The proposed project would require existing roads to be used for hauling equipment and materials during construction; however, it would not require the construction of new roadways in the study area, and mitigation would not be required.

Telephone, Fiber Optic, and Microwave Communications

Locations of buried telephone and fiber optic lines would be taken into account during construction of the proposed project, and potentially affected utility companies would be consulted as necessary. Impacts to radio frequencies are not anticipated and mitigation would not be required.

Traffic

It is anticipated that traffic volumes would increase during construction due to workers and large trucks delivering equipment to the proposed project. It is estimated that approximately 12 trips per day would be generated during the construction period. The temporary, localized increase in traffic is not expected to be at a volume that would alter travel patterns in the area. Permits for transportation of large equipment would be acquired as needed from the North Dakota Department of Transportation prior to construction and would be the responsibility of the contractor. Mitigation would not be required.

Water Supply

The proposed project is not anticipated to impact water supply. Mitigation would not be required.

6.4 Human Health and Safety

Air Traffic

The Federal Aviation Administration (FAA) regulates federal airspace. Overhead power lines, depending on their height, may have an effect on airports or navigable airspace. The FAA was contacted as part of project scoping; a response was not received.

The nearest commercial airport is Fargo's Hector International Airport, located approximately 34 miles northeast of the proposed project. J. Vining Airport, a small general aviation airport, is located approximately 3.3 miles northeast of the proposed project.

Hazardous Materials/Hazardous Waste

A Phase I Environmental Assessment was performed in a manner consistent with the ASTM 2247-08, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property. The Assessment also complied with the U.S. Environmental Protection Agency 40 CFR Part 312 Standards and Practices for All Appropriate Inquiries, Final Rule. The purpose of the Assessment was to identify Recognized Environmental Conditions (RECs) in connection with the Property; no RECs were identified.

6.4.1 Human Health and Safety Impacts/Mitigation

Air Traffic

The nearest commercial airport is 34 miles away and the nearest general aviation airport is 3.3 miles away. The proposed project is not anticipated to impact air traffic and mitigation would not be required.

Hazardous Materials/Hazardous Waste

The proposed project would not impact hazardous materials or hazardous waste sites.

6.5 Noise

The proposed project is located in a rural setting that typically receives noise contributions from farm machinery and local roadway traffic. Noise levels in rural settings typically range from 35 to 45 decibels (dBA).

6.5.1 Noise Impacts/Mitigation

Construction of the proposed project would result in temporary noise impacts in the immediate vicinity of the project. These noise impacts would only be incurred for the duration of construction and are anticipated to be minor in the overall setting. Once in-service, noise generated by the Project will be below background/environmental noise levels. Mitigation would not be required.

6.6 Visual

The visual landscape in the project study area consists of rural agricultural fields with existing overhead electric infrastructure. No visually sensitive areas, such as National Parks, exist in the vicinity of the project.

6.6.1 Visual Impacts/Mitigation

The proposed project would include a reroute of an overhead electric line approximately 530 feet north of its existing alignment. This would result in minor modification of the immediate area's visual aesthetics. However, the existing segment of overhead electric line would be decommissioned and removed, resulting in no net gain in visual encumbrance due to overhead power infrastructure. Mitigation would not be required.

6.7 Cultural and Archaeological Resources

A Class I Literature Review (Class I) was completed by Beaver Creek Archaeology, Inc. in November 2013. The Class I focused on an area of potential effect (APE), comprised of the proposed reroute, and a one-mile radius search area surrounding the APE. Results of this review indicated that there are 14 sites, two site leads, and three isolated finds within a one-mile radius of the APE.

A Class III Cultural Resources Inventory was also completed in November 2013 and is included in Appendix C. No previously unrecorded sites were encountered, and a *no historic properties affected* recommendation was made.

6.7.1 Cultural and Archaeological Resources Impacts/Mitigation

The State Historic Preservation Office (SHPO) concurred with the *no historic properties affected* determination on January 7, 2014. A copy of this correspondence is included in Appendix D.

6.8 Recreational Resources

There are no golf courses, recreational areas, state parks, or state historic markers in the vicinity of the proposed project. Furthermore, the proposed project lies outside of the portion of the Central Flyway for waterfowl migration that traverses North Dakota. Though migrating waterfowl may occasionally use the surrounding area for refuge, this portion of the state is not a prime hunting destination.

6.8.1 Recreational Resources Impacts/Mitigation

The proposed project may result in temporary disturbance of waterfowl's use of surrounding wetlands and feeding areas, which may disrupt occasional hunting in the immediate study area. These impacts are temporary and would only last for the duration of construction. Mitigation would not be required.

6.9 Land-Based Economics

Agriculture is the primary generator of land-based revenue in Cass County.

6.9.1 Land-Based Economics Impacts/Mitigation

The proposed project would convert approximately 0.01 acre of land from farmland to electrical utility use through installation of structures to support overhead electric lines. The remainder of the study area would remain available for agriculture use upon construction completion. In addition, any transmission line structures removed from upland areas would be returned to agricultural use. Given

the small scale of disturbance, the proposed project would not impact land-based economics and mitigation would not be required.

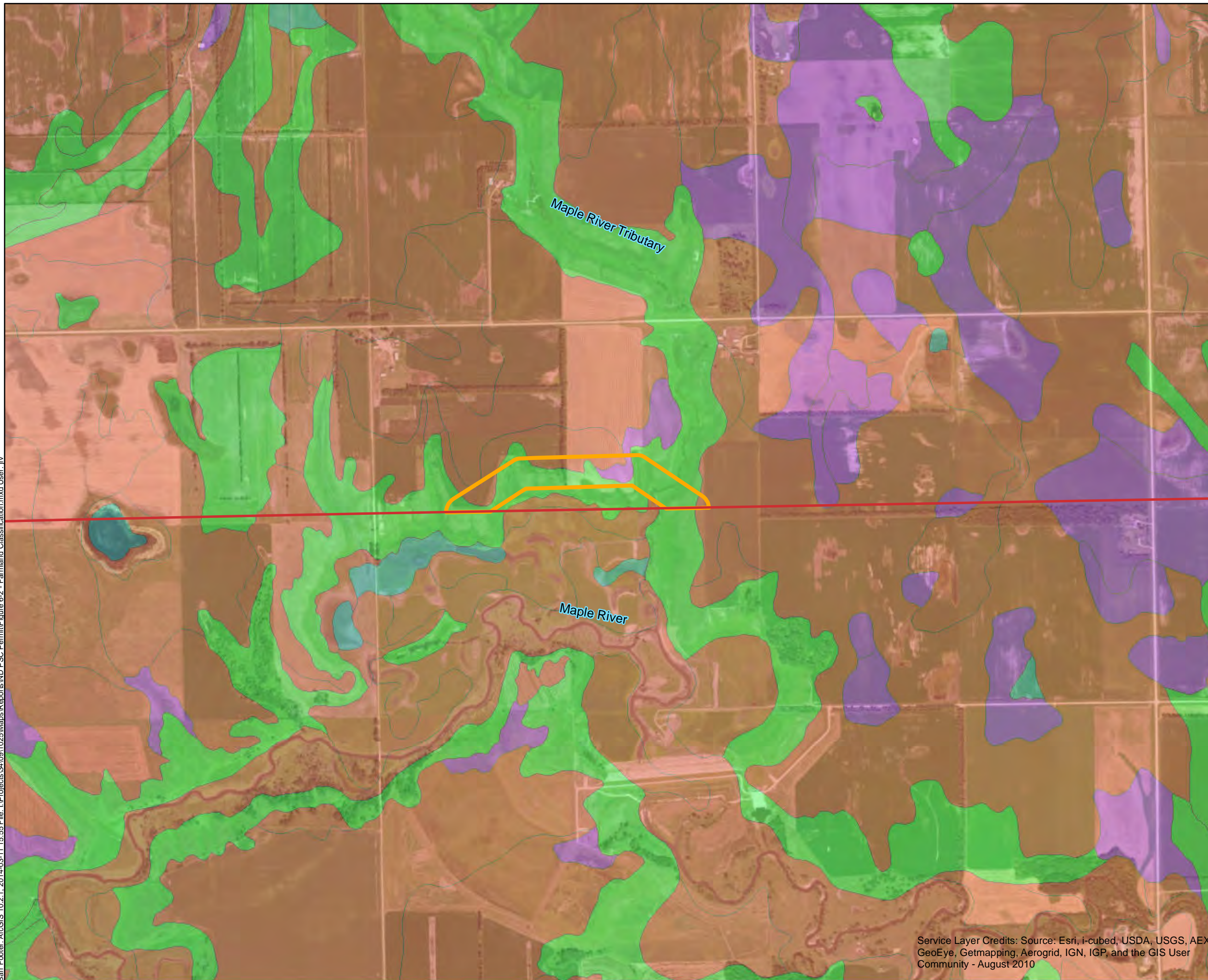
6.10 Soils





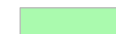

Five soil types are found in the project study area. The majority of these soils are not classified by the Natural Resources Conservation Service (NRCS) as prime or statewide farmland, though some smaller areas are. See Figure 6-1. The NRCS has responsibility under the Farmland Protection Policy Act (FPPA) in documenting conversion of prime, statewide importance, and local importance farmland to non-agriculture use.

6.10.1 Soils Impacts/Mitigation

Project impacts to soils are anticipated to be minor. Soil impacts would be localized, and BMPs would be implemented to minimize these impacts. Surface disturbance associated with construction of the proposed project could result in the soil surface becoming more prone to wind and water erosion. In addition, soil may be compacted as a result of the heavy equipment used in construction. BMPs may include the use of erosion and sediment control during construction, segregating topsoil from subsurface materials, use of construction equipment appropriately sized to the scope and scale of the project, and maintaining appropriate drainage. Per correspondence received from the NRCS, since the proposed project is not receiving federal funding, the FPPA would not apply. Please See Appendix A.

Barr Footer: ArcGIS 10.2.1, 2014-03-11 15:55 File: I:\Projects\3A\091025\Maps\Reports\ND_PSC_Permit\Figure 6-2 - Farmland Classification.mxd User: iv



-  Existing Line
-  Proposed Reroute
- Farmland Classification**
-  All areas are prime farmland
-  Farmland of statewide importance
-  Not prime farmland
-  Prime farmland if drained

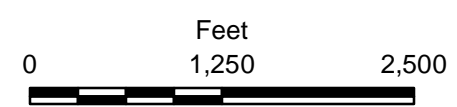


Figure 6-1

FARMLAND CLASSIFICATION
Minnesota Power
Cass County, ND

Service Layer Credits: Source: Esri, i-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community - August 2010

6.11 Geologic and Groundwater Resources

The proposed project is located in an ecoregion of North Dakota known as the Glacial Lake Agassiz Basin. This area was previously occupied by glacial Lake Agassiz; as such, it is extremely flat and has fewer lakes and pothole wetlands than neighboring ecoregions. Typical geology of this ecoregion consists of beds of glacial drift, 150 to 300 feet thick, overlain by up to 95 feet of silt and clay lacustrine deposits from glacial Lake Agassiz.

No aquifers are located in the study area, and no sole source aquifers have been designated in North Dakota.

6.11.1 Geologic and Groundwater Resources Impacts/Mitigation

The proposed project would not impact geologic or groundwater resources; mitigation would not be required.

6.12 Surface Water and Floodplain Resources

There are no streams, rivers, lakes, or other bodies of water in the project study area. The Maple River is located approximately 0.35 miles to the south, but the proposed project is outside of its floodplain.

6.12.1 Surface Water and Floodplain Resources Impacts/Mitigation

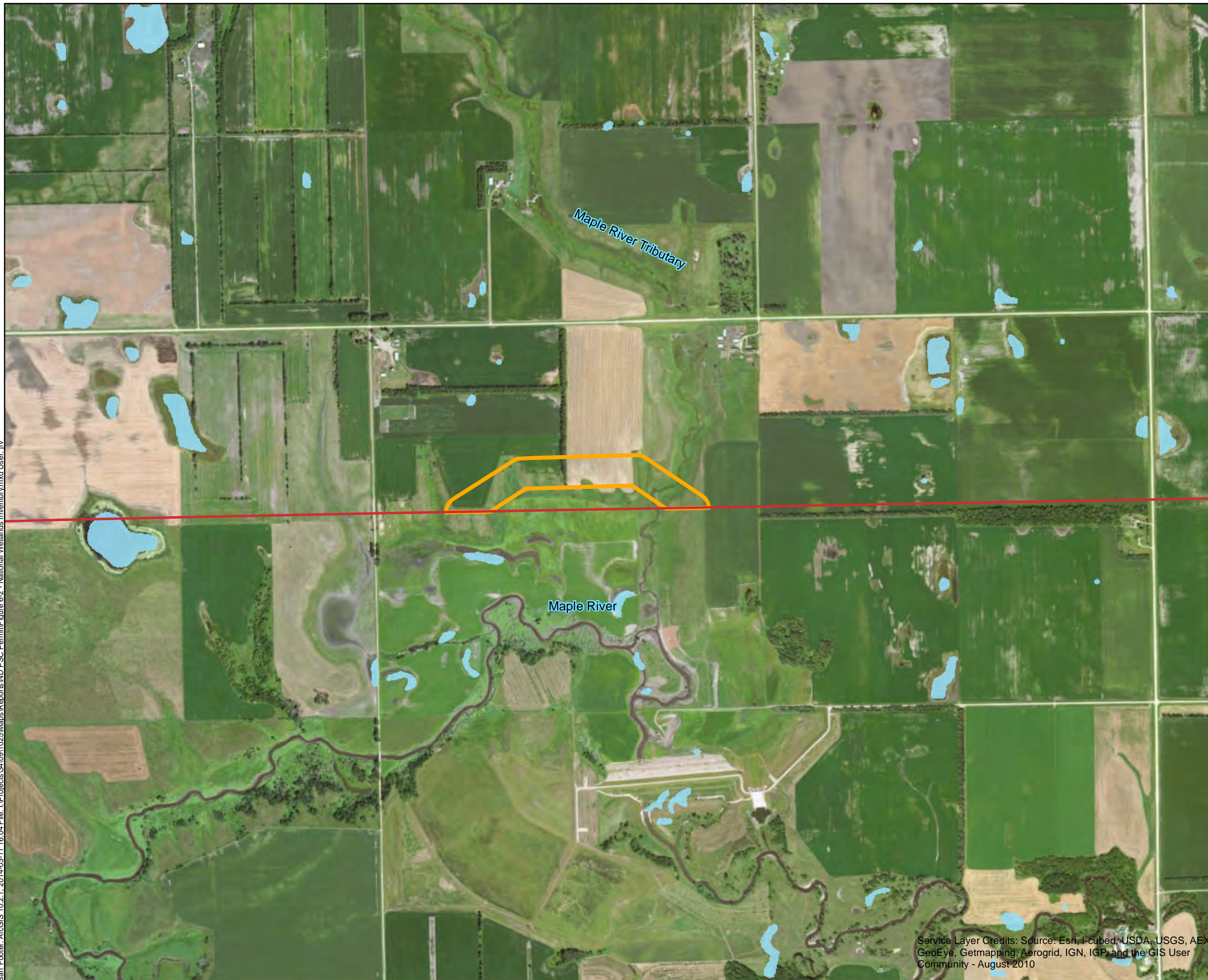
The proposed project would not impact surface water or floodplains; mitigation would not be required.

6.13 Wetlands

The proposed project lies outside the prairie pothole region of North Dakota, and many of the area's isolated wetland basins have been drained and converted to alternate land uses over time. The proposed reroute would cross a small tributary to the Maple River. However, according to the USFWS National Wetland Inventory, and as shown on Figure 6-2, there are no wetlands within the proposed project area.

6.13.1 Wetland Impacts/Mitigation

The proposed project has been designed to avoid placement of poles in wetland. As such, there would be no wetland impacts and mitigation would not be required.



- Existing Line
- Proposed Reroute
- NWI Wetlands

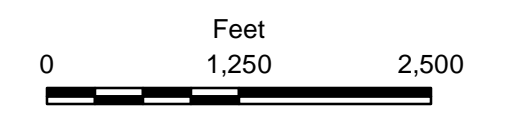


Figure 6-2

NATIONAL WETLANDS INVENTORY
Minnesota Power
Cass County, ND

Service Layer Credits: Source: Esri, i-cubed, USDA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community - August 2010

6.14 Vegetation

Land in the immediate vicinity of the project is farmed. One wind row of trees is located in the study area.

6.14.1 Vegetation Impacts/Mitigation

Since the area is presently being farmed, it would remain available for farming upon completion of construction rather than being revegetated with native grassland species. A tree and shrub survey will be completed and submitted in the Supplemental Application to the PSC.

6.15 Wildlife and Avian Species

The project study area is actively used for agricultural crop production. Though both game and non-game wildlife species use the area, the project area does not contain any high quality wildlife habitat.

Protection is provided for the bald and golden eagles through the Bald and Golden Eagle Protection Act (BGEPA) and for other migratory birds through the Migratory Bird Treaty Act (MBTA). The BGEPA was written with the intent to protect and preserve bald and golden eagles, both of which are treated as a species of concern within the Department of the Interior. The MBTA regulates impacts to migratory bird species such as direct mortality, habitat degradation, and/or displacement of individual birds.

The proposed project lies outside of the portion of the Central Flyway for waterfowl and other bird migration that traverses North Dakota. Though migrating birds and waterfowl may occasionally use the surrounding area for refuge, this portion of the state is not located along primary migration routes.

Review of the North Dakota Natural Heritage Inventory did not note the recorded observance of any sensitive wildlife or avian populations within 0.5 miles of the proposed project.

6.15.1 Wildlife and Avian Species Impacts/Mitigation

Ground clearing activities associated with construction of the proposed project may impact habitat for ground dwelling mammals and other wildlife species. While wildlife may use the study area for feeding, they are anticipated to adapt to temporary construction disturbance and continue to thrive. Additionally, the areas of proposed land use conversion (approximately 0.01 acre) are minimal in the context of the setting. Furthermore, the study area has been previously and continues to be disturbed due to farming practices. The proposed project is not anticipated to result in long-term wildlife impacts and mitigation would not be required.

The project study area does not contain suitable habitat for bald or golden eagles. Therefore, eagle impacts are not anticipated and mitigation would not be required. Similar to wildlife, resident avian species are anticipated to adapt to temporary construction disturbance and continue to utilize the area. To comply with the MBTA, construction of the proposed project is scheduled to take place in the fall to avoid avian breeding and nesting seasons. Avian impacts are not anticipated and mitigation would not be required.

6.16 Rare and Unique Natural Resources

The study area was evaluated to determine the potential for federally-listed threatened, endangered, and candidate species. An official list of federally-listed species in the vicinity of the proposed project was requested through the USFWS IPaC online program (Consultation Tracking Number 06E15000-2014-SLI-0007) on December 17, 2013. According to the IPaC results, the following species are listed in the vicinity of the proposed project:

- Whooping crane (endangered)
- Poweshiek skipperling (proposed endangered)

Review of the North Dakota Natural Heritage Inventory did not note the recorded observance of any threatened or endangered species within one mile of the proposed project. See Appendix A, Agency Coordination.

6.16.1 Rare and Unique Natural Resources Impacts/Mitigation

The proposed project includes a minor reroute of an overhead utility that is already in existence. Suitable habitat for the whooping crane consists of shallow, open-water wetlands characterized by cattails, bulrushes, and sedges. Wetlands in the project area are riverine in nature or man-made stock ponds and do not provide suitable whooping crane habitat; therefore, the proposed project is anticipated to have *no effect* on the whooping crane. USFWS concurrence is not required with a *no effect* determination and mitigation would not be required.

Suitable habitat for the poweshiek skipperling includes prairie fens, grassy lake and stream margins, moist meadows, and wet-mesic to dry tallgrass prairie. Land use surrounding the project area consists of farm and pasture land, as well as wooded riverbanks. These land uses do not provide suitable poweshiek skipperling habitat and the proposed project is not anticipated to impact this species.

6.17 Summary of Impacts

Table 8 contains a summary of the proposed project, its environmental impacts, as well as any mitigation measures proposed.

Table 8 Summary Comparison of Project Alternatives and Impacts

Resource	No Action Alternative Impacts	Proposed Project Impacts	Proposed Mitigation
Demographics	No impact.	No adverse impact.	None
Land Use	No impact.	Minor conversion of approximately 0.01 acres from farmland to utility use.	None
Public Services	No impact.	Enhance the reliability of the area's electrical network. Minor temporary traffic increases.	None
Human Health and Safety	No impact.	No adverse impact.	None
Noise	No impact.	Temporary noise increases during construction, no long-term impacts.	None
Visual	No impact.	Minor modification of the immediate area's visual aesthetics.	None
Cultural and Archaeological Resources	No impact.	No adverse impact.	None
Recreational Resources	No impact.	No adverse impact.	None
Land-Based Economics	No impact.	No adverse impact.	None
Soils	No impact.	May cause soil surface to become more prone to wind and water erosion and may result in soil compaction.	BMPs will be used, as appropriate, during and after construction.
Geologic and Groundwater Impacts	No impact.	No adverse impact anticipated.	None
Surface Water and Floodplain Resources	No impact.	No adverse impact anticipated.	None
Wetlands	No impact.	No adverse impact anticipated.	None
Vegetation	No impact.	No adverse impact anticipated.	None
Wildlife and Avian Species	No impact.	Temporary disturbance during construction; however, species are expected to remain in area and continue to use it following construction. No adverse impact anticipated.	Construction is timed to take place in the fall, outside of the migratory bird breeding and nesting season. No mitigation required.
Rare and Unique Resources	No impact.	No effect to threatened or endangered species, no impact to species proposed for listing.	No mitigation required.

6.18 Irreversible and Irretrievable Commitment of Resources.

As with any construction project, certain irreversible and irretrievable commitments of natural resources, man power, materials, and fiscal resources are required. Fossil fuels, labor, and construction materials will be expended to complete the project. Additionally, labor and natural resources will be used in the fabrication and preparation of construction materials; these materials are generally not retrievable; however, they are not in short supply and their use would not have an adverse effect on the availability of these resources. Any construction would require a one-time expenditure of funds, which are not retrievable; however, the anticipated benefits would balance the irretrievable commitment of resources caused by construction of the proposed project.

7.0 Additional Factors to Consider in Application Evaluation

7.1 Environmental Studies Completed for Project

The following environmental studies have been completed for the proposed project:

- Phase I Environmental Site Assessment
- Class I Literature Review for cultural resources
- Class III Survey for cultural resources

7.2 Technologies Used to Minimize Adverse Environmental Effects

The proposed project is not anticipated to have adverse environmental effects. It has been designed using appropriate industry standards, and new technologies to minimize impacts were not considered.

7.3 Beneficial Uses of Waste Energy

Waste energy is not anticipated to be generated by the proposed project.

7.4 Unavoidable Adverse Environmental Impacts

The proposed project is not anticipated to result in any unavoidable direct or indirect adverse environmental impacts. An environmental impact assessment is included in Section 6 of the of this Application package.

7.5 Alternative Routes Developed during Project Hearing to Minimize Adverse Effects

This section will be addressed, as appropriate, after a Notice of Opportunity for Hearing has been published and subsequently closed.

7.6 Irreversible and Irretrievable Commitments of Natural Resources

As with any construction project, certain irreversible and irretrievable commitments of natural resources, man power, materials, and fiscal resources are required. Fossil fuels, labor, and construction materials will be expended to complete the project. Additionally, labor and natural resources will be used in the fabrication and preparation of construction materials; these materials are generally not retrievable; however, they are not in short supply and their use would not have an adverse effect on the availability of these resources. Any construction would require a one-time

expenditure of funds, which are not retrievable; however, the anticipated benefits would balance the irretrievable commitment of resources caused by construction of the proposed project.

7.7 Economic Impacts

The proposed project was developed to improve structural integrity of MP's existing overhead power network rather than to capitalize on new economic development; therefore, the proposed project is not anticipated to impact land based economies or the economics of the surrounding area.

7.8 Potential for Additional Development

No additional development is anticipated as a result of the proposed project.

7.9 Scenic Areas, Historic Sites and Structures, and Paleontological or Archaeological Sites

There are no scenic areas or historic sites/structures in the vicinity of the proposed project. As discussed in Section 6.7, SHPO has concurred with a *no historic properties affected* determination.

7.10 Threatened and Endangered Species

As discussed in Section 6.16, the proposed project would have *no effect* on threatened or endangered species. USFWS concurrence is not required with a *no effect* determination and mitigation would not be required.

7.11 Mitigation Measures

As described in Section 6, the project is not anticipated to have adverse environmental impacts; mitigation measures and monitoring are not anticipated.

8.0 Public Involvement

If ordered by the PSC, with finding by the PSC that the application is complete, a Notice of Opportunity for a Public Hearing will be published in the official newspaper of Cass County. In addition, the Notice of Opportunity for a Public Hearing will be distributed to all landowners affected by the project. If requested by any interested person and good cause has been shown therefor, the PSC shall hold a Public Hearing that would be advertised in local newspapers or as otherwise directed by the PSC.

9.0 Agency Coordination

To initiate early communication and coordination, a scoping package was sent to federal, state, and local entities on January 15, 2014. This scoping package included information on the project and a project location map. At the conclusion of the 30-day comment period, a total of 13 responses from 11 different entities were received. These comments have been referenced as incorporated where appropriate in the text of this document. Please refer to Appendix A, Agency Coordination.

9.1 Summary of Commenting Agencies

Table 9 provides a list of agencies that provided comments during the project scoping process.

Table 9 Summary of Commenting Agencies

Jurisdiction	Agency
Federal Agencies	U.S. Department of Agriculture – Natural Resources Conservation Service
	U.S. Department of Defense – Army Corps of Engineers, North Dakota Regulatory Office
	U.S. Department of the Interior – Fish and Wildlife Service, North Dakota Field Office
	U.S. Department of the Interior – Fish and Wildlife Service, Valley City Wetland Management District
State Agencies	North Dakota Department of Health
	North Dakota Game and Fish Department
	North Dakota Parks and Recreation Department
	North Dakota State Water Commission
	State Historical Society of North Dakota
Local Entities	Cass County Planning Department
	Cass County Water Resource District
	Highland Township, Cass County

The following discussion provides a summary of each agency response received. Complete copies of each response can be found in Appendix A, Agency Coordination.

9.1.1 U.S. Department of Agriculture – Natural Resources Conservation Service

The NRCS stated that, since the project is not supported by federal funding, the Farmland Protection Policy Act (FPPA) would not apply.

9.1.2 U.S. Department of Defense – Army Corps of Engineers, North Dakota Regulatory Office

The response received from the USACE outlined the agency's regulatory authority over dredged and fill in waters of the U.S. (Section 404), as well as work impacting navigable waters (Section 10).

9.1.3 U.S. Department of the Interior – Fish and Wildlife Service, North Dakota Field Office

The response stated that the project, as described, will have no significant impact on fish and wildlife resources and that no endangered or threatened species are known to occupy the project area and/or are not likely to be adversely affected.

9.1.4 U.S. Department of the Interior – Fish and Wildlife Service, Valley City Wetland Management District

The response stated that the USFWS has no property interests within one mile of the proposed project area.

9.1.5 North Dakota Department of Health

The North Dakota Department of Health stated that it believed the environmental effects from the proposed project will be minor and can be controlled by proper construction methods. These methods include minimizing: fugitive dust emissions, adverse effects to water bodies, noise, and obtaining a North Dakota Discharge Elimination System (NDPDES) Permit if the project results in more than one acre of disturbance. Included with the letter were the department's construction and environmental disturbance requirements. It was also stated that the North Dakota Department of Health owns no land in or adjacent to the proposed project, nor does it have any projects scheduled in the area. In addition, it believes the project is consistent with the State Implementation Plan for the Control of Air Pollution for the State of North Dakota.

9.1.6 North Dakota Game and Fish Department

A voice message was received from the North Dakota Game and Fish Department stating that that the agency does not anticipate having comments on the project

9.1.7 North Dakota Parks and Recreation Department

The North Dakota National Heritage Inventory did not identify any sensitive species or habitat in the proposed project area; the nearest recorded species is more than 0.5 miles away. The department requested that all efforts be made to avoid impacts to waterfowl and wildlife species and their habitats. It requested pre- and post-construction aviation monitoring studies to identify and assess

adverse impacts to waterfowl and wildlife. In addition, the department requested that impacted areas be revegetated with species native to the project area.

9.1.8 North Dakota State Water Commission

The North Dakota State Water Commission responded that the proposed project is not in an identified or mapped floodplain and that no floodplain permits would be required; all waste material must be disposed of properly and not within floodways; that no sole source aquifers have been designated in North Dakota; and that the project sponsor is responsible for acquiring appropriate local, state, and federal agencies are contacted for any required permits, approvals, and easements.

9.1.9 State Historical Society of North Dakota

The North Dakota State Historic Preservation Officer concurred with the *no significant historic properties affected* recommendation made for the project. A copy of this concurrence is included in Appendix D.

9.1.10 Cass County Water Resource District

Per phone conversation with the Cass County Water Resource District, no district permits are required if county drains are not crossed. According to the map provided by the District, the proposed project does not cross county drains.

9.1.11 Cass County Planning Department

The Cass County Planning Department has no recommendations or concerns regarding the proposed project.

9.1.12 Highland Township, Cass County

Highland Township does not require a permit for transmission line projects and requested that the proposed project not contribute to inundation of township rights-of-way. The township officers are in agreement with the proposed project proceeding, as included in Appendix B.

9.1.13 Agencies Solicited but No Response Received

Of the 39 agencies and other interested parties that were solicited for this project, 28 did not respond. Appendix A provides the list of agencies contacted for comment.

10.0 Identification of Potential Permits/Approvals

The following permits would be required prior to construction:

- PSC – Certificate of Corridor Compatibility and Energy Transmission Facility Route Permit
- North Dakota Department of Health – NDPDES Permit (including Stormwater Pollution Prevention Plan) if disturbed area is greater than one acre.

11.0 Qualifications of Contributors to this Corridor Study

Minnesota Power Project Management Team

Daniel McCourtney – Permit Manager

Craig Kvale – Project Engineer

Barr Engineering Management Team

Mandy Bohnenblust

Mandy has more than six years of experience providing environmental consulting services that range from Phase I site assessments to biological-resources and protected-species studies. She served as the task lead on state and local permitting work for Minnesota Power’s Bison 3 and ACE wind developments, and currently manages the ALLETE Clean Energy project. For both projects, she coordinated subconsultants’ fieldwork and resources reporting. In addition, she participated in the Phase I for the ACE project, and has worked on numerous other Phase I projects for energy clients.

Shanna Braun

Shanna has eight years of experience in environmental consulting. Her services include performing wetland delineations, assessing impacts, and facilitating the environmental approval process for projects related to energy transmission and alternative energy, and natural resources. She has particular experience managing staff, project tasks, regulatory compliance, schedules, and budgets on projects requiring NEPA review. In the last several years, Shanna has completed more than 60 wetland delineations in five upper-Midwest states; performed more than 50 environmental assessments; assisted with development of wetland mitigation plans; and developed and implemented public involvement strategies for engineering projects.

Joshua Vosejka

Joshua Vosejka recently joined Barr after graduating from Minnesota State University in Mankato with a degree in geographic information systems. As a GIS specialist at Barr, his work involves using GIS for figure and map creation, working with and interpreting aerial photos, analyzing both raster and vector data, developing GIS scripts and programs, working with internet map applications, and coordinating GIS work with other software applications.

John Wachtler

John joined Barr in 2005 with a background that includes work for private industry and governmental agencies. At Barr, he assists clients with environmental siting and permitting issues, as well as EIS preparation, transmission-route and power-plant permitting, risk assessments, and regulatory and public participation strategy. John recently served as the project manager for the development of the EIS prepared with the state of Minnesota's Office of Energy Security for the CapX Brookings-to-Hampton 345 kV transmission line.

Appendix A
Agency Coordination

[Project Name] SOV LIST

Save as new file for each project and edit accordingly with project specific contacts

CTitle	First	Last	Title	Department	Agency	Address	City	State	Zip	Phone	Fax
Mr.	Eric	Schmit, P.E.		Chief Missile Engineering	Minot Air Force Base	320 Peacekeeper Place	Minot AFB	ND	58705		
Mr.	James	Larsen		Cable Affairs Office	Minot Air Force Base	330 Bomber Blvd	Minot AFB	ND	58705		
Sir	or	Madam	Acting Regional Administrator	Regional Office	Department of HUD	1670 Broadway, Ste. 200	Denver	CO	80202-4813		
Ms.	Laurie	Suttmeier	Manager	Bismarck Airports District Office	Federal Aviation Administration	2301 University Drive, Bldg 23B	Bismarck	ND	58504		
Sir	or	Madam	Deputy Base Civil Engineer	319 CES/CEVA	Grand Forks Air Force Base	525 Tuskagee Airmen Rd.	Grand Forks AFB	ND	58205-6434		
Larry	Kotchman	State Forester		ND Forest Service	307 1st St. E.	Bottineau	ND		58318-1100		
Mr.	Dan	Cimarosti	Manager	ND Regulatory Office	US Army Corps of Engineers	1513 S. 12th St.	Bismarck	ND	58504		
Ms.	Mary	Podoll	State Conservationist		US Department of Agriculture - NRCS	PO Box 1458	Bismarck	ND	58502-1458		
Mr.	Gerald	Paulson	Director, Transmission Lines and Substatio	Western Area Power Admin.	US Department of Energy	PO Box 1173	Bismarck	ND	58502-1173	701-221-4531	
Mr.	Jeffrey	Towner	Field Supervisor		US Fish & Wildlife Service	3425 Miriam Avenue	Bismarck	ND	58501		
Mr.	Kurt	Tompkins	Supervisor	Valley City WMD	US Fish & Wildlife Service	11515 River Rd	Valley City	ND	58072		
Mr.	Lonnie	Hoffer	Disaster Recovery Chief	Department of Homeland Security	ND Department of Emergency Services	PO Box 5511	Bismarck	ND	58506	701-328-8100	
Mr.	L. David	Glatt	Chief	Environmental Health Section Gold Seal Center	ND Department of Health	918 E. Divide Ave., 4th floor	Bismarck	ND	58501-1947	701-328-5150	701-328-5200
Mr.	Steve	Dyke	Supervisor	Conservation Section	ND Game & Fish Department	100 Bismarck Expressway	Bismarck	ND	58501-5095	701-328-6347	701-328-6352
Mr.	Mark	Zimmerman	Director		ND Parks & Recreation Dept.	1600 E. Century Ave., Suite 3	Bismarck	ND	58503-0649	701-328-5357	701-328-5363
Mr.	Merl	Paaverud	Director	State Historic Preservation Office	State Historical Society of North Dakota	612 East Boulevard	Bismarck	ND	58505		
Mr.	Kyle	Wanner	Aviation Planner		ND Aeronautics Commission	PO Box 5020	Bismarck	ND	58502-5020		
Mr.	Todd	Sando	State Engineer		ND State Water Commission	900 E. Blvd. Ave.	Bismarck	ND	58505-0850		
Mr.	Jerry	Lein			ND Public Service Commission	600 E. Boulevard, Dept. 408	Bismarck	ND	58505-0480		
Mr.	Scott	Hochhalter	State Soil Specialist	NDSU Extension Service	Soil Conservation Committee	2718 Gateway Ave., #104	Bismarck	ND	58503	701-328-9715	701-328-9721
Mr.	Chad	Peterson	County Commissioner	Commission	Cass County	211 9th St S	Fargo	ND	58103-1833		
Mr.	Vern	Bennett	County Commissioner	Commission	Cass County	211 9th St S	Fargo	ND	58103-1833		
Mr.	Ken	Pawluk	County Commissioner	Commission	Cass County	212 9th St S	Fargo	ND	58103-1834		
Ms.	Mary	Scherling	County Commissioner	Commission	Cass County	213 9th St S	Fargo	ND	58103-1835		
Mr.	Darrell	Vanyo	County Commissioner	Commission	Cass County	214 9th St S	Fargo	ND	58103-1836		
Mr.	Michael	Montplaisir		Auditor's Office	Cass County	PO Box 2806	Fargo	ND	58108-2806		
Mr.	Keith	Berndt		County Administrative Office	Cass County	PO Box 2806	Fargo	ND	58108-2806		
Mr.	Dave	Rogness		Emergency Management	Cass County	4630 15th Ave N	Fargo	ND	58102-5801		
	Hali	Durand		Planning and Zoning	Cass County	1201 Main Ave W	West Fargo	ND	58078-1301		
Mr.	Keith	Berndt		Risk Management	Cass County	PO Box 2806	Fargo	ND	58108-2806		
Mr.	Paul	Laney		Sheriff's Office	Cass County	PO Box 488	Fargo	ND	58108-0488		



January 15, 2014

«CTitle» «First» «Last»
«Title»
«Department»
«Agency»
«Address»
«City», «State» «Zip»

**Re: Minnesota Power 250kV Overhead Line Reroutes
Cass County, North Dakota**

Dear Mr. «Last»:

Minnesota Power is planning to reroute a 0.7-mile long segment of 250kV overhead power line in Cass County, North Dakota (*please refer to enclosed Project Location Map*). The proposed reroute is needed to move the existing structures out of standing water and maintain adequate ground clearance. In addition to being in the best interest of structural integrity, the reroutes would also provide upland access to allow for easier maintenance and comply with North American Electric Reliability Corporation standards. The reroute would tie back into existing Minnesota Power facilities and continue to provide utility service. Construction is anticipated to take place in the Summer or Fall of 2014.

Pursuant to Chapter 49-22 of the North Dakota Century Code and Article 69-06 of the North Dakota Century Code, Minnesota Power will seek a Certificate of Corridor Compatibility and Route Permit from the North Dakota Public Service Commission (PSC) for the 0.7-mile reroute. Barr Engineering Company is assisting Minnesota Power in these efforts.

The purpose of this letter is to inform your organization of the proposed project and to ensure that all known social, economic, and environmental effects are considered in the development of this project. We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the Certificate application for the PSC's records. Written comments are requested by **February 17, 2014** for consideration in this study.

If further information is desired regarding the proposed project, please contact me by email (abohnenblust@barr.com) or by phone (952-842-3533).

Sincerely,

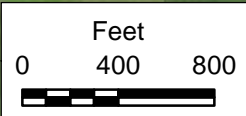
A handwritten signature in blue ink, appearing to read "Mandy Bohnenblust".





Mandy Bohnenblust
Barr Engineering
Project Manager

Enclosures: Project Location Map



PROPOSED REROUTE



-  Existing Line
-  Proposed Reroute
-  NWI Wetlands
-  PLS Section Within 1 Mile

T: 137 R: 54
S: 3

T: 137 R: 54
S: 2

T: 137 R: 54
S: 1

T: 137 R: 54
S: 10

T: 137 R: 54
S: 11

T: 137 R: 54
S: 12

T: 137 R: 54
S: 15

T: 137 R: 54
S: 14

T: 137 R: 54
S: 13

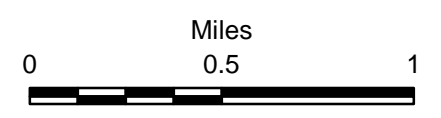


Figure 1

PROJECT LOCATION
Minnesota Power
Cass County, ND

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community - August 2010

January 15, 2014

«CTitle» «First» «Last»
«Title»
«Department»
«Agency»
«Address»
«City», «State» «Zip»

**Re: Minnesota Power 250kV Overhead Line Reroutes
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Pursuant to Chapter 49-22 of the North Dakota Century Code and Article 69-06 of the North Dakota Century Code, Minnesota Power will seek a Certificate of Corridor Compatibility and Route Permit from the North Dakota Public Service Commission (PSC) for the 0.7-mile reroute. Barr Engineering Company is assisting Minnesota Power in these efforts.

Barr requested an official list of federally-listed species in the vicinity of the project through the USFWS IPaC online program (attached; Consultation Tracking Number 06E15000-2014-SLI-0007) on December 17, 2013. According to the IPaC results, the following species are listed in the vicinity of the proposed re-routes:

- Whooping crane (endangered)
- Poweshiek skipperling (proposed endangered)

The proposed project consists of a minor re-route of existing overhead utilities which would be shifted approximately 530 feet north.

Suitable habitat for the whooping crane consists of shallow, open-water wetlands characterized by cattails, bulrushes, and sedges. Wetlands in the project area are riverine in nature or man-made stock ponds and do not provide suitable whooping crane habitat; therefore, the proposed project is anticipated to have *no effect* on the whooping crane.

Suitable habitat for the poweshiek skipperling includes prairie fens, grassy lake and stream margins, moist meadows, and wet-mesic to dry tallgrass prairie. Land use surrounding the project area consists of farm and pasture land, as well as wooded riverbanks. These land uses do not provide suitable poweshiek skipperling habitat and the proposed project is not anticipated to impact this species.

The additional purpose of this letter is to inform your organization of the proposed project and to ensure that all known social, economic, and environmental effects are considered in the development of this project. We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the Certificate application for the PSC's records. Written comments are requested by **February 17, 2014** for consideration in this study.

If further information is desired regarding the proposed project, please contact me by email (abohnenblust@barr.com) or by phone (952-842-3533).




Sincerely,



Mandy Bohnenblust
Barr Engineering
Project Manager

Enclosures: Project Location Map
IPaC Consultation Letter (Tracking Number 06E15000-2014-SLI-0007)



-  Existing Line
-  Proposed Reroute
-  NWI Wetlands
-  PLS Section Within 1 Mile

Feet
0 400 800

Miles
0 0.5 1



Figure 1

PROJECT LOCATION
Minnesota Power
Cass County, ND

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community - August 2010

Barr Footer: ArcGIS 10.2.1, 2014-01-13 12:13 File: I:\Projects\34\09\1025\Maps\Basemaps\ND_PSC\Figure 1 - Project Location Map.mxd User: kac2



United States Department of the Interior



FISH AND WILDLIFE SERVICE
NORTH DAKOTA ECOLOGICAL SERVICES FIELD OFFICE
3425 MIRIAM AVENUE
BISMARCK, ND 58501

PHONE: (701)250-4481 FAX: (701)355-8513

URL:

www.fws.gov/northdakotafielddoffice/endspecies/endangered_species.htm

Consultation Tracking Number: 06E15000-2014-SLI-0007

December 17, 2013

Project Name: Minnesota Power - Cass County Reroutes

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Minnesota Power - Cass County Reroutes

Official Species List

Provided by:

NORTH DAKOTA ECOLOGICAL SERVICES FIELD OFFICE

3425 MIRIAM AVENUE

BISMARCK, ND 58501

(701) 250-4481

http://www.fws.gov/northdakotafieldoffice/endspecies/endangered_species.htm

Consultation Tracking Number: 06E15000-2014-SLI-0007

Project Type: Transmission Line

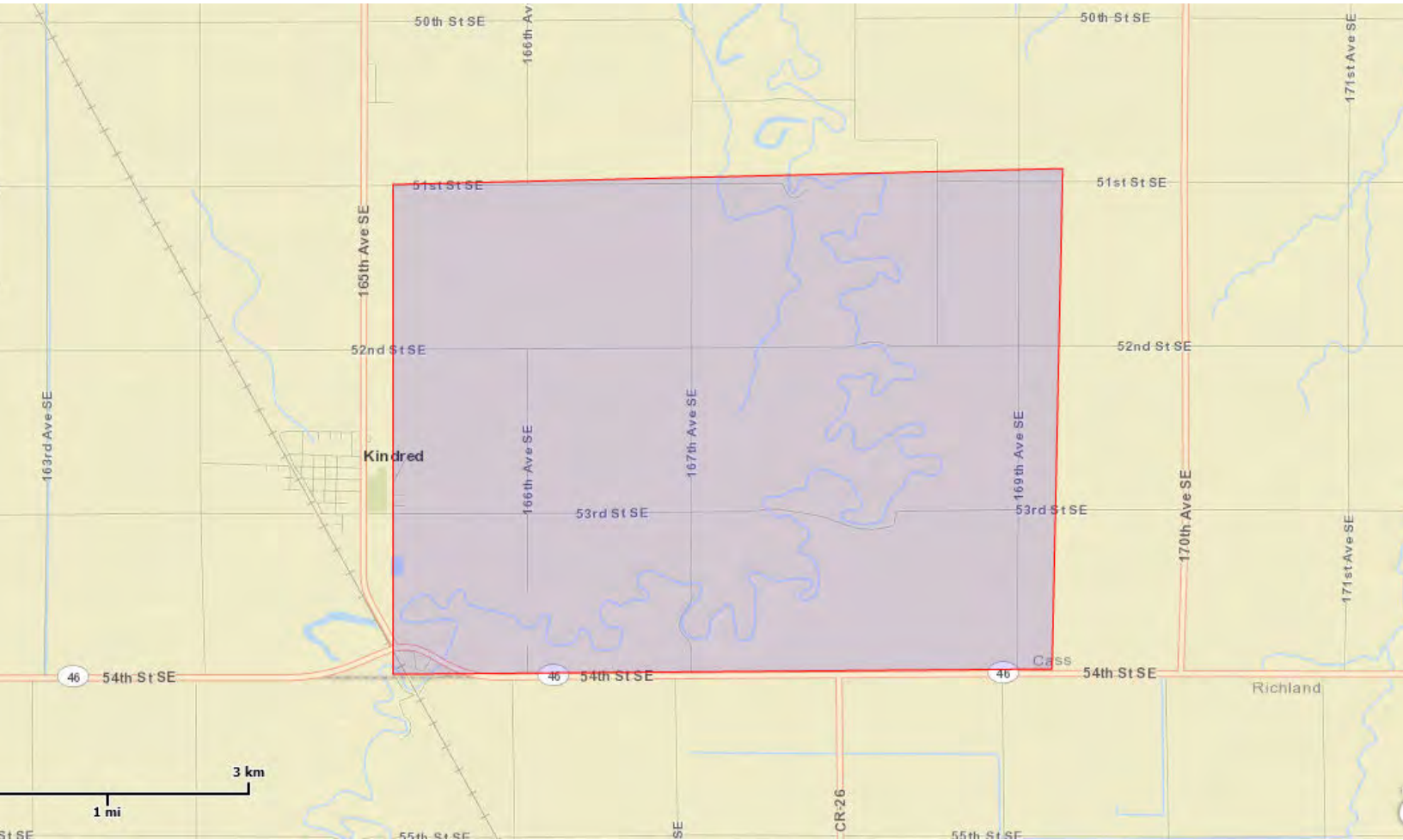
Project Description: Minnesota Power plans to reroute a 0.7-mile long segment and reconstruct a 400-foot segment of 250kV overhead power line in Cass County, North Dakota. Due to changes in the areas hydrology, the project is needed to move the existing structures out of standing water and maintain adequate clearance from a nearby reservoir. This is in the best interest of structural integrity, and would also provide upland access for easier maintenance. Construction is planned for Fall 2014.



United States Department of Interior
Fish and Wildlife Service

Project name: Minnesota Power - Cass County Reroutes

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-97.0069991 46.6734763, -96.9205161 46.6748897, -96.9218894 46.6305851, -97.0069991 46.6301135, -97.0069991 46.6734763)))

Project Counties: Cass, ND



United States Department of Interior
Fish and Wildlife Service

Project name: Minnesota Power - Cass County Reroutes

Endangered Species Act Species List

There are a total of 2 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed on the **Has Critical Habitat** lines may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Poweshiek skipperling (*Oarisma poweshiek*)

Listing Status: Proposed Endangered

Has Critical Habitat: Proposed

Whooping crane (*Grus americana*)

Population: except where EXPN

Listing Status: Endangered

Has Critical Habitat: Final designated



United States Department of Interior
Fish and Wildlife Service

Project name: Minnesota Power - Cass County Reroutes

Critical habitats that lie within your project area

There are no critical habitats within your project area.

**Minnesota Power
250 kV Direct Current Line Re-route
Cass County, North Dakota
List of Scoping Responses**

Federal Agencies

U.S. Department of Agriculture – Natural Resources Conservation Service
U.S. Department of Defense – Army Corps of Engineers, North Dakota Regulatory Office
U.S. Department of the Interior – Fish and Wildlife Service, North Dakota Field Office
U.S. Department of the Interior – Fish and Wildlife Service, Valley City Wetland
Management District

State Agencies

North Dakota Department of Health
North Dakota Game and Fish Department
North Dakota Parks and Recreation Department
North Dakota State Water Commission
State Historical Society of North Dakota

Local Entities

Cass County Planning Department
Cass County Water Resource District
Highland Township, Cass County



Natural Resources Conservation Service
PO Box 1458
Bismarck, ND 58502-1458

January 28, 2014

Mandy Bohnenblust
Barr Engineering
Project Manager
4700 West 77th Street, Ste. 200
Minneapolis, Minnesota 55435

Re: Minnesota Power 250kV Overhead Line Reroutes
Cass County, North Dakota

Dear Ms. Bohnenblust:

The Natural Resources Conservation Service (NRCS) has reviewed your letter dated January 15, 2014, concerning rerouting a .07-mile long segment of 250kV overhead power line in Cass County, North Dakota.

Farmland Protection Policy Act

NRCS has a major responsibility with the Farmland Protection Policy Act (FPPA) in documenting conversion of farmland (i.e., prime, statewide importance and local importance) to non agriculture use. It appears your proposed project is not supported by federal funding, therefore, FPPA does not apply and no further action is needed.

Wetlands

The Wetland Conservation Provisions of the 1985 Food Security Act, as amended, provide that if a USDA participant converts a wetland for the purpose or to have the effect of making agricultural production possible, loss of USDA benefits could occur. The NRCS has developed the following guidelines for the installation of permanent structures where wetlands occur. If these guidelines are followed the impacts to the wetland will be considered minimal allowing USDA participants to continue to receive USDA benefits. Following are the requirements:

- Disturbance to the wetland must be temporary.
- No drainage of wetland is allowed (temporary or permanent).
- Mechanized landscaping necessary for installation is kept to a minimum and preconstruction contours are maintained.
- Temporary side cast material must be placed in such a manner not to be dispersed in the wetland.

Helping People Help the Land

An Equal Opportunity Provider and Employer

- All trenches must be backfilled to the original wetland bottom elevation.

NRCS would recommend that impacts to wetlands be avoided.

If you have additional questions pertaining to FPPA, please contact Steve Sieler, Liaison Soil Scientist, NRCS, Bismarck, ND at 701-530-2019.

Sincerely,

A handwritten signature in black ink, appearing to read "Wade D. Bott". The signature is stylized with a large, looped "W" and a cursive "Bott".

WADE D. BOTT
State Soil Scientist



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
NORTH DAKOTA REGULATORY OFFICE
1513 SOUTH 12TH STREET
BISMARCK ND 58504-6640

January 23, 2014

North Dakota Regulatory Office

Mandy Bohnenblust
Barr Engineering Co
4700 W 77th Street Suite 200
Minneapolis, Minnesota 55435

Dear Ms. Bohnenblust:

This is in response to your letter dated January 15, 2014, requesting US Army Corps of Engineers (Corps) comments concerning the Minnesota Power project to reroute a 0.7-mile long segment of 250kV overhead power line located in Cass County, North Dakota.

Please be advised, Corps regulatory offices administer Section 10 of the Rivers and Harbors Act (Section 10) and Section 404 of the Clean Water Act (Section 404). Section 10 regulates work impacting navigable waters. Section 10 waters in North Dakota are the Missouri River (including Lake Sakakawea and Lake Oahe), Yellowstone River, James River south of the railroad track in Jamestown, North Dakota, Bois de Sioux River, Red River of the North, and the Upper Des Lacs Lake. Work over, in, or under navigable waters is considered to have an impact. Section 404 of the Clean Water Act regulates the discharge of dredged or fill material (temporarily or permanently) in waters of the United States. Waters of the United States may include, but are not limited to, rivers, streams, ditches, coulees, lakes, ponds, and their adjacent wetlands. Fill material includes, but is not limited to, rock, sand, soil, clay, plastics, construction debris, wood chips, overburden from mines or other excavation activities and materials used to create any structure or infrastructure in waters of the United States.

Do not hesitate to contact this office by letter or telephone (701) 255-0015 if we can be of further assistance.

Sincerely,

Matthew J. Mikulecky
Acting Regulatory Program Manager
North Dakota

resourceful, naturally.
engineering and environmental consultants

BARR
U.S. FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
ND FIELD OFFICE

January 15, 2014

Mr. Jeffrey Towner
Field Supervisor
US Fish & Wildlife Service
3425 Miriam Avenue
Bismarck, ND 58501

**Re: Minnesota Power 250kV Overhead Line Reroutes
Cass County, North Dakota**

Project as described will have no significant impact on fish and wildlife resources. No endangered or threatened species are known to occupy the project area and/or are not likely to be adversely affected. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT PLANS FOR REVIEW.

2-24-14 Jeffrey K. Towner
Date Jeffrey K. Towner
Field Supervisor

Dear Mr. Towner:

Minnesota Power is planning to reroute a 0.7-mile long segment of 250kV overhead power line in Cass County, North Dakota (*please refer to enclosed Project Location Map*). The proposed reroute is needed to move the existing structures out of standing water and maintain adequate ground clearance. In addition to being in the best interest of structural integrity, the reroutes would also provide upland access to allow for easier maintenance and comply with North American Electric Reliability Corporation standards. The reroute would tie back into existing Minnesota Power facilities and continue to provide utility service. Construction is anticipated to take place in the Summer or Fall of 2014.

Pursuant to Chapter 49-22 of the North Dakota Century Code and Article 69-06 of the North Dakota Century Code, Minnesota Power will seek a Certificate of Corridor Compatibility and Route Permit from the North Dakota Public Service Commission (PSC) for the 0.7-mile reroute. Barr Engineering Company is assisting Minnesota Power in these efforts.

Barr requested an official list of federally-listed species in the vicinity of the project through the USFWS IPaC online program (attached; Consultation Tracking Number 06E15000-2014-SLI-0007) on December 17, 2013. According to the IPaC results, the following species are listed in the vicinity of the proposed re-routes:

- Whooping crane (endangered)
- Poweshiek skipperling (proposed endangered)

The proposed project consists of a minor re-route of existing overhead utilities which would be shifted approximately 530 feet north.

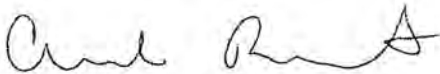
Suitable habitat for the whooping crane consists of shallow, open-water wetlands characterized by cattails, bulrushes, and sedges. Wetlands in the project area are riverine in nature or man-made stock ponds and do not provide suitable whooping crane habitat; therefore, the proposed project is anticipated to have *no effect* on the whooping crane.

Suitable habitat for the poweshiek skipperling includes prairie fens, grassy lake and stream margins, moist meadows, and wet-mesic to dry tallgrass prairie. Land use surrounding the project area consists of farm and pasture land, as well as wooded riverbanks. These land uses do not provide suitable poweshiek skipperling habitat and the proposed project is not anticipated to impact this species.

The additional purpose of this letter is to inform your organization of the proposed project and to ensure that all known social, economic, and environmental effects are considered in the development of this project. We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the Certificate application for the PSC's records. Written comments are requested by **February 17, 2014** for consideration in this study.

If further information is desired regarding the proposed project, please contact me by email (abohnenblust@barr.com) or by phone (952-842-3533).

Sincerely,



Mandy Bohnenblust
Barr Engineering
Project Manager

Enclosures: Project Location Map
IPaC Consultation Letter (Tracking Number 06E15000-2014-SLI-0007)

Shanna R. Braun

From: Tompkins, Kurt <kurt_tompkins@fws.gov>
Sent: Thursday, January 23, 2014 2:09 PM
To: Mandy Bohnenblust
Subject: Minnesota Power 250kV Line Reroute, Cass County, North Dakota

Mandy -

Thanks for your letter dated January 15, 2014 regarding Minnesota Power's plans to reroute a 0.7-mile segment of overhead power line in Cass County, North Dakota.

The U.S. Fish and Wildlife Service (Service) has no property interests within one mile of the proposed project area.

Please contact our Ecological Services office in Bismarck, North Dakota for any other permits or approvals that may be required by the Service.

Thanks again for your letter. Please don't hesitate to contact me if you should have questions.

--
Kurt Tompkins
District Manager
US Fish and Wildlife Service
Valley City Wetland Management District
11515 River Road
Valley City, ND 58072
O - 701-845-3466
C - 701-840-3128
F - 701-845-3482



February 5, 2014

Ms. Mandy Bohnenblust
Barr Engineering Company
4700 West 77th Street, Suite 200
Minneapolis, MN 55435

Re: Minnesota Power 250kV Overhead Line Reroutes
Cass County, North Dakota

Dear Ms. Bohnenblust:

This department has reviewed the information concerning the above-referenced project submitted under date of January 15, 2014, with respect to possible environmental impacts.

This department believes that environmental impacts from the proposed construction will be minor and can be controlled by proper construction methods. With respect to construction, we have the following comments:

1. All necessary measures must be taken to minimize fugitive dust emissions created during construction activities. Any complaints that may arise are to be dealt with in an efficient and effective manner.
2. Care is to be taken during construction activity near any water of the state to minimize adverse effects on a water body. This includes minimal disturbance of stream beds and banks to prevent excess siltation, and the replacement and revegetation of any disturbed area as soon as possible after work has been completed. Caution must also be taken to prevent spills of oil and grease that may reach the receiving water from equipment maintenance, and/or the handling of fuels on the site. Guidelines for minimizing degradation to waterways during construction are attached.
3. Projects disturbing one or more acres are required to have a permit to discharge storm water runoff until the site is stabilized by the reestablishment of vegetation or other permanent cover. Further information on the storm water permit may be obtained from the Department's website or by calling the Division of Water Quality (701-328-5210). Also, cities may impose additional requirements and/or specific best management practices for construction affecting their storm drainage system. Check with the local officials to be sure any local storm water management considerations are addressed.
4. Noise from construction activities may have adverse effects on persons who live near the construction area. Noise levels can be minimized by ensuring that construction equipment is

Ms. Mandy Bohnenblust

2.

February 5, 2014

equipped with a recommended muffler in good working order. Noise effects can also be minimized by ensuring that construction activities are not conducted during early morning or late evening hours.

The department owns no land in or adjacent to the proposed improvements, nor does it have any projects scheduled in the area. In addition, we believe the proposed activities are consistent with the State Implementation Plan for the Control of Air Pollution for the State of North Dakota.

If you have any questions regarding our comments, please feel free to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "L. David Glatt". The signature is written in a cursive style with a large, prominent initial "L".

L. David Glatt, P.E., Chief
Environmental Health Section

LDG:cc
Attach.



Construction and Environmental Disturbance Requirements

These represent the minimum requirements of the North Dakota Department of Health. They ensure that minimal environmental degradation occurs as a result of construction or related work which has the potential to affect the waters of the State of North Dakota. All projects will be designed and implemented to restrict the losses or disturbances of soil, vegetative cover, and pollutants (chemical or biological) from a site.

Soils

Prevent the erosion of exposed soil surfaces and trapping sediments being transported. Examples include, but are not restricted to, sediment dams or berms, diversion dikes, hay bales as erosion checks, riprap, mesh or burlap blankets to hold soil during construction, and immediately establishing vegetative cover on disturbed areas after construction is completed. Fragile and sensitive areas such as wetlands, riparian zones, delicate flora, or land resources will be protected against compaction, vegetation loss, and unnecessary damage.

Surface Waters

All construction which directly or indirectly impacts aquatic systems will be managed to minimize impacts. All attempts will be made to prevent the contamination of water at construction sites from fuel spillage, lubricants, and chemicals, by following safe storage and handling procedures. Stream bank and stream bed disturbances will be controlled to minimize and/or prevent silt movement, nutrient upsurges, plant dislocation, and any physical, chemical, or biological disruption. The use of pesticides or herbicides in or near these systems is forbidden without approval from this Department.

Fill Material

Any fill material placed below the high water mark must be free of top soils, decomposable materials, and persistent synthetic organic compounds (in toxic concentrations). This includes, but is not limited to, asphalt, tires, treated lumber, and construction debris. The Department may require testing of fill materials. All temporary fills must be removed. Debris and solid wastes will be removed from the site and the impacted areas restored as nearly as possible to the original condition.



Jack Dahympfle, Governor
Mark A. Zimmerman, Director

1600 East Century Avenue, Suite 3
Bismarck, ND 58503-0649
Phone 701-328-5357
Fax 701-328-5363
E-mail parkrec@nd.gov
www.parkrec.nd.gov

February 13, 2014

Ms. Mandy Bohnenblust
Barr Engineering
4700 West 77th Street
Suite 200
Minneapolis, MN 58435

RECEIVED
FEB 18 2014

ENGINEERING CO.

Re: Minnesota Power 250kV Overhead Line Reroutes Cass County North Dakota.

Dear Ms. Bohnenblust,

The North Dakota Parks and Recreation Department (the Department) has reviewed the above referenced proposed Minnesota Power 250kV Overhead Line Reroutes in Cass County, North Dakota.

Our agency scope of authority and expertise covers recreation and biological resources (in particular rare plants and ecological communities). The project as defined does not affect state park lands that we manage or Land and Water Conservation Fund recreation projects that we coordinate.

The North Dakota Natural Heritage biological conservation database has been reviewed to determine if any plant or animal species of concern or other significant ecological communities are known to occur within an approximate one-mile radius of the project area. Based on this review, we one species of concern documented in adjacent section to project area. Please see the attached spreadsheet and map for more information on these occurrences.

Because this information is not based on a comprehensive inventory, there may be species of concern or otherwise significant ecological communities in the area that are not represented in the database. The lack of data for any project area cannot be construed to mean that no significant features are present. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources.

In an effort to avoid or minimize impacts to waterfowl and wildlife and their habitats we encourage proper evaluation of all potential overhead line reroutes. To identify and assess adverse impacts to waterfowl and wildlife we suggest pre and post construction avian monitoring studies be conducted. Regarding any reclamation efforts, we recommend that any impacted areas be revegetated with species native to the project area.

It is our policy to charge requests for data services including data retrieval, data analysis, manual and computer searches, packaging and collection of data. An invoice for services provided has been enclosed.

We appreciate your commitment to rare plant, animal and ecological community conservation, management and inter-agency cooperation to date. For additional information please contact me (701-328-5370 or kgduttonhefner@nd.gov). Thank you for the opportunity to comment on this proposed project.

Sincerely,


Kathy Duttonhefner, Coordinator
Planning and Natural Resources Division

R.USNDNHI*2014-019KD2/13/2014DL2.17.2014

.....
Play in our backyard!

**ND Parks and
Recreation Department**

ND Natural Heritage Inventory
1600 East Century Ave., Suite 3
Bismarck, ND 58503-0649
(701) 328-5370 FAX: (701) 328-5363

INVOICE

INVOICE NO: 200
DATE: 1/13/2014

Mandy Bohnenblust
Barr Engineering Cp.
4700 West 77th Street, Suite 200
Minneapolis, MN 55435

CONTACT	REFERENCE NO.	DATE SHIPPED	SHIPPED VIA	F.O.B. POINT	TERMS
K.Duttenhefner	NHI_2014-019	2/13/2014	usps		

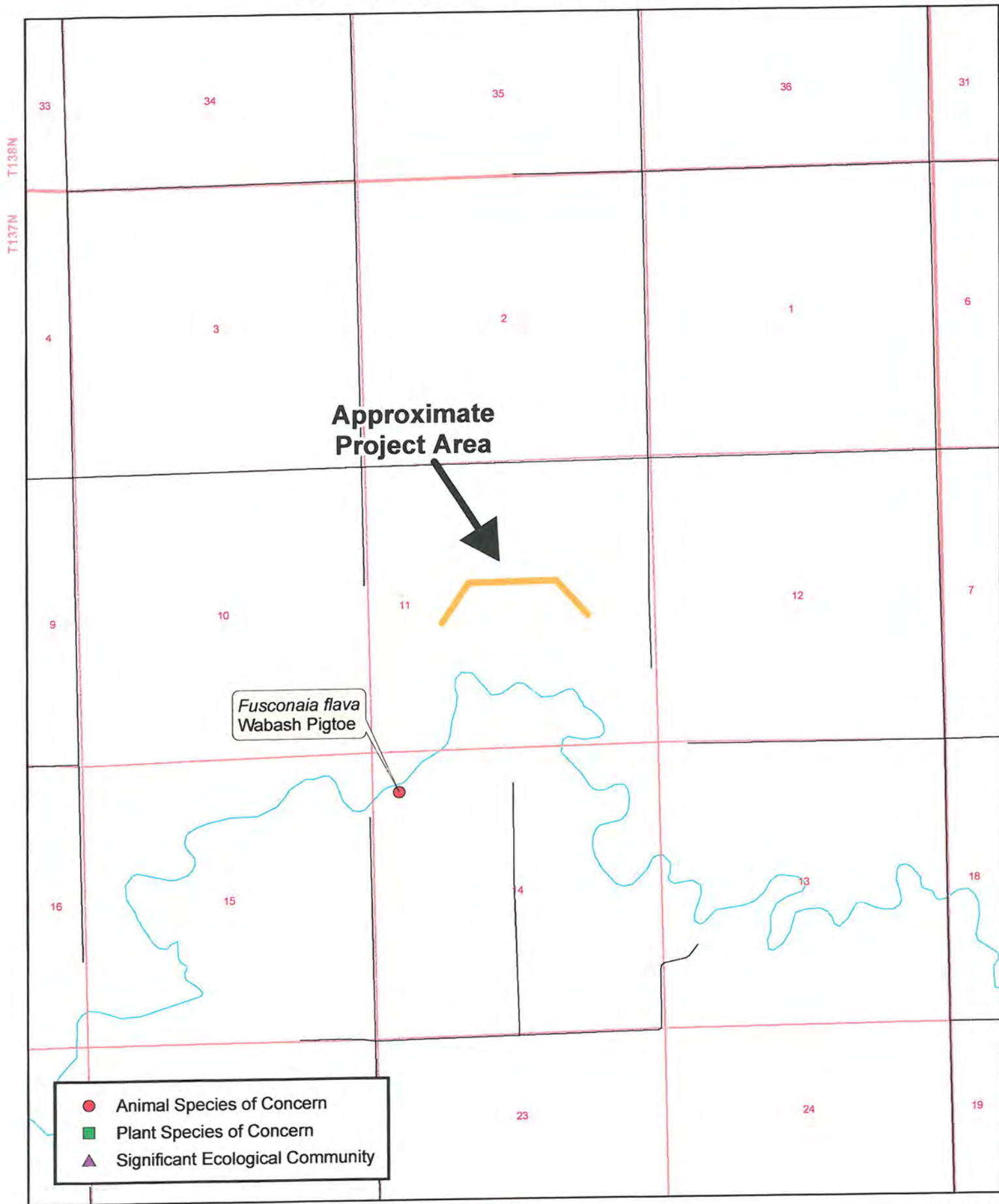
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
1	Data retrieval, data analysis, manual and computer searches, packaging and collection of data. Project Minnesota Power 250kV Overhead Line Reroutes, Cass County, North Dakota	\$ 60.00	\$ 60.00
SUBTOTAL			\$ 60.00
SALES TAX			
SHIPPING & HANDLING			
TOTAL DUE			\$ 60.00

Make all checks payable to: ND Parks and Recreation Department
If you have any questions concerning this invoice, call: Kathy Duttenhefner, (701) 328-5370

THANK YOU FOR YOUR INTEREST IN RARE SPECIES CONSERVATION.

Entry Event	Fund	Depr.	Project	Activity
463021	398	1508	OR15082	15082

North Dakota Parks and Recreation Department North Dakota Natural Heritage Inventory



North Dakota Natural Heritage Inventory
 Rare Animal and Plant Species and Significant Ecological Communities

State Scientific Name	State Common Name	State Rank	Global Rank	Federal Status	Township Range Section	County	Last Observation	Estimated Representation Accuracy	Precision
Fusconaia flava	Wabash Pigtoe	S4	G5		137N054W - 14	Cass	1966		S

North Dakota Natural Heritage Inventory Biological and Conservation Data Disclaimer

The quantity and quality of data collected by the North Dakota Natural Heritage Inventory are dependent on the research and observations of many individuals and organizations. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in North Dakota have never been thoroughly surveyed, and new species are still being discovered. For these reasons, the Natural Heritage Inventory cannot provide a definite statement on the presence, absence, or condition of biological elements in any part of North Dakota. Natural Heritage data summarize the existing information known at the time of the request. Our data are continually upgraded and information is continually being added to the database. This data should never be regarded as final statements on the elements or areas that are being considered, nor should they be substituted for on-site surveys.

Estimated Representation Accuracy

Value that indicates the approximate percentage of the Element Occurrence Representation (EO Rep) that was observed to be occupied by the species or community (versus buffer area added for locational uncertainty). Use of estimated representation accuracy provides a common index for the consistent comparison of EO reps, thus helping to ensure that aggregated data are correctly analyzed and interpreted.

Very high (>95%)

High (>80%, <= 95%)

Medium (>20%, <= 80%)

Low (>0%, <= 20%)

Unknown

(null) - Not assessed

Precision

A single-letter code for the precision used to map the Element Occurrence (EO) on a U.S. Geological Survey (USGS) 7.5' (or 15') topographic quadrangle map, based on the previous Heritage methodology in which EOs were located on paper maps using dots.

S - Seconds: accuracy of locality mappable within a three-second radius; 100 meters from the centerpoint

M - Minute: accuracy of locality mappable within a one-minute radius; 2 km from the centerpoint

G - General: accuracy of locality mappable to map or place name precision only; 8 km from centerpoint

U - Unmappable



North Dakota State Water Commission

900 EAST BOULEVARD AVENUE, DEPT 770 • BISMARCK, NORTH DAKOTA 58505-0850
701-328-2750 • TDD 701-328-2750 • FAX 701-328-3696 • INTERNET: <http://swc.nd.gov>

February 14, 2014

Mandy Bohnenblust
Barr Engineering
4700 West 77th Street STE 200
Minneapolis, MN 435

Dear Ms. Bohnenblust:

This is in response to your request for review of environmental impacts associated with the Minnesota Power 250kV Overhead Line Reroutes located in Cass County, ND.

The proposed project has been reviewed by State Water Commission staff and the following comments are provided:

- There are no floodplains identified and/or mapped where this proposed project is to take place. The project takes place in an unmapped area. No floodplain permits are necessary from Cass County relative to the National Flood Insurance Program.
- It is the responsibility of the project sponsor to ensure that local, state and federal agencies are contacted for any required approvals, permits, and easements.
- All waste material associated with the project must be disposed of properly and not placed in identified floodway areas.

Thank you for the opportunity to provide review comments. If you have any questions, please call me at 701-328-4967.

Sincerely,

Linda Weispenning
Water Resource Planner

LW:dp/1570



Highway Department

Jason Benson, P.E.
County Engineer

Richard S. Sieg
Superintendent

Thomas B. Soucy, P.E.
Design and Construction
Engineer

February 7, 2014

Barr Engineering Co.
Mandy Bohnenblust
4700 West 77th Street, Suite 200
Minneapolis, MN 55435

RE: Minnesota Power 250kV Overhead Line Reroutes, Cass County,
North Dakota

Dear Ms. Bohnenblust,

I have reviewed the proposed overhead line reroute on Section 10 in Highland Township and have no recommendations or concerns regarding this proposal.

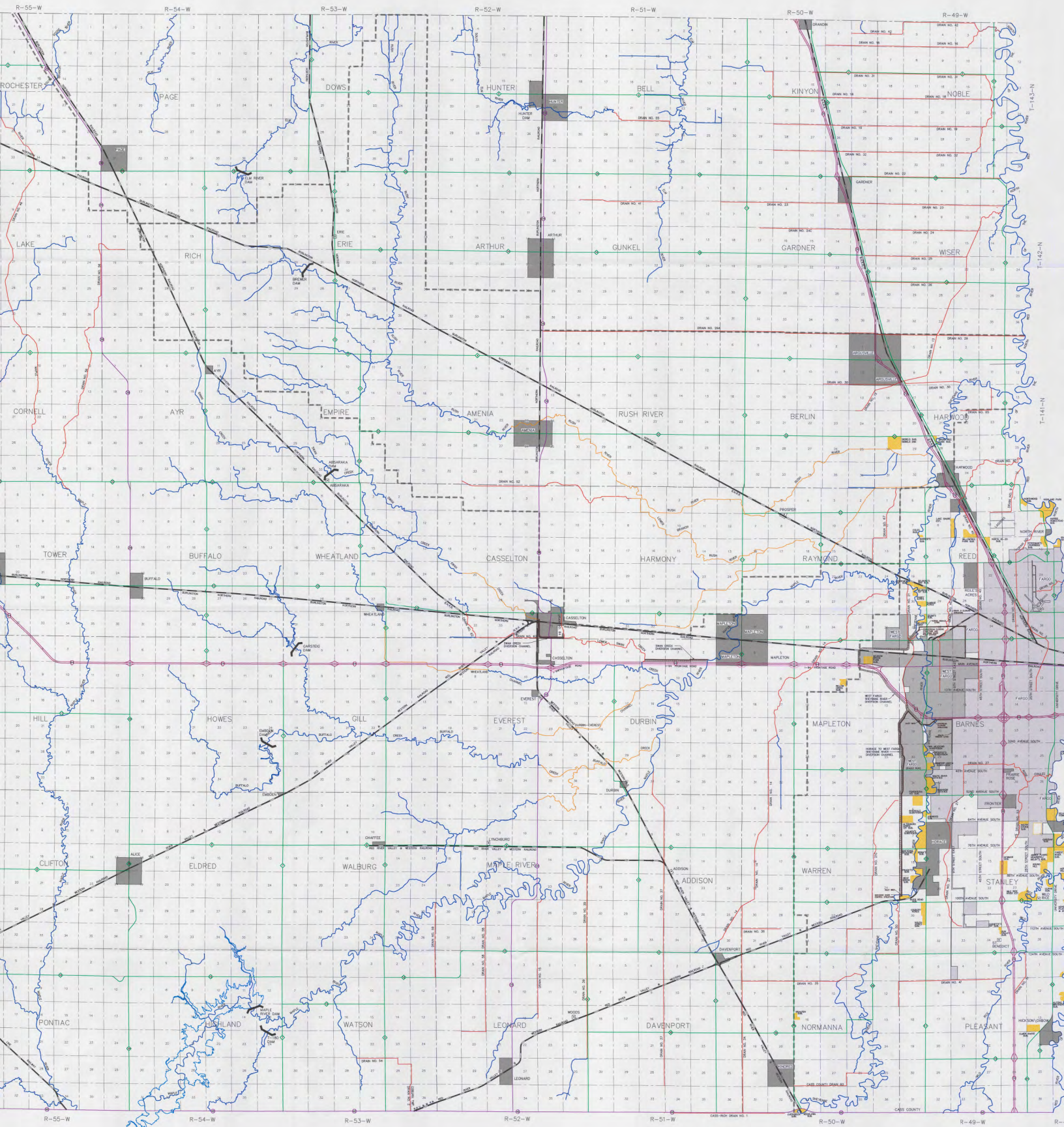
Respectfully,

A handwritten signature in black ink that reads "Hali Durand". The signature is written in a cursive style with a long, sweeping underline.

Hali A. Durand
Cass County Planner

1201 Main Avenue West
West Fargo, North Dakota
58078-1301

701-298-2370
Fax: 701-298-2395



- LEGEND**
- INTERSTATE HIGHWAY
 - STATE HIGHWAY
 - COUNTY HIGHWAY
 - FRONTAGE ROAD
 - RAILROAD
 - TOWNSHIP LINES
 - SECTION LINES
 - WATER RESOURCE DISTRICT

CASS COUNTY MAP
CASS COUNTY, NORTH DAKOTA

DRAWN BY: MPL
 DATE: 04.02.08
 REVISED: 04.08.07
 REVISED: 01.31.11
 REVISED:



www.mooreengineering.com

Appendix B

Highland Township Project Approval

Shanna R. Braun

From: Daniel McCourtney (ALLETE) <dmccourtney@allete.com>
Sent: Monday, March 03, 2014 11:24 AM
To: Mandy Bohnenblust
Subject: Highland Township DC Line Reroute Approval.

Hi Mandy,
Highland Township used the correct company name below for MP's Cass County DC Line Reroute approval.

Dan

Daniel McCourtney

Siting and Permitting
ALLETE/Minnesota Power
30 West Superior St.
Duluth, MN 55802

Phone: (218) 355-3515
Cell: (218) 428-5089
Fax: (218) 723-3916


From: Mattew Lund [mailto:buzzard_58031@hotmail.com]
Sent: Monday, March 03, 2014 11:21 AM
To: Daniel McCourtney (ALLETE)
Subject:

Hey Dan,
Myself and the other township officers have agreed to give Minnesota Power permission to go ahead with the proposed rerouting of the power lines in Section 11 of Highland Township. If you have any questions feel free to email me or call me at 701-212-2005. Thanks.

Sincerely
Matt Lund

Appendix C

Class III Cultural Resources Inventory Report



Cass County D.C. Line West Survey: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota

Prepared for: Barr Engineering
On behalf of: Minnesota Power

Prepared by: Lindsey Reiners and Amanda Cordes Person

Beaver Creek Archaeology, Inc.
Bismarck, North Dakota

BCA Project #: 2013 – 1089

December, 2013



Beaver Creek
ARCHAEOLOGY

WHERE PROGRESS MEETS PRESERVATION

1432 Capitol Way | Bismarck, ND 58501 | PH [701] 663.5521 | FX [701] 663.5509

www.bcarch.org | e-mail: info@bcarch.org



MANUSCRIPT DATA RECORD FORM

1. Manuscript Number:
2. SHPO Reference #:
3. Author(s): **Lindsey Reiners and Amanda Cordes Person**
4. Title (Complete title as it appears on the report title page): **Cass County D.C. Line West Survey: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota.**
5. Report Date: **December, 2013**
6. Number of Pages (Including front matter, references cited and appendices): **17**
7. Type – I = Inventory (Class 3 CRI), T – Test, E= Excavation, O = Other: **Type I**
8. Acres – Class 3 inventory only; project description specified only in report: **92**
9. Legal Location(s) (no quarter sections) with Historic Context Study Unit(s): Consult township tables in The North Dakota Comprehensive Plan for Historic Preservation: Archaeological Component, (SHSND 1990) for Study Unit Assignments. Study Units: LM, CB, KN, HE, SM, GA, JA, GR, NR, SR, SO, SH, YE

COUNTY	TWP	R	SEC	SU
Cass	137	54	11	SH



Report Title: Cass County D.C. Line West Survey: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota

Author: Lindsey Reiners and Amanda Cordes Person

Report Date: December, 2013

Acres: 92

Land Status: Private

Survey Date: November 27, 2013

Project Sponsor: Barr Engineering

Historic Context: Sheyenne River Study Unit (#12)

Legal Description/Location of Project Area: The proposed project is located in the N $\frac{1}{2}$ NE $\frac{1}{4}$ SE $\frac{1}{4}$ & NW $\frac{1}{4}$ NW $\frac{1}{4}$ SE $\frac{1}{4}$ & S $\frac{1}{2}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ & NW $\frac{1}{4}$ SE $\frac{1}{4}$ NE $\frac{1}{4}$ & SW $\frac{1}{4}$ NE $\frac{1}{4}$ & SE $\frac{1}{4}$ NW $\frac{1}{4}$ & SE $\frac{1}{4}$ SW $\frac{1}{4}$ NW $\frac{1}{4}$ & NE $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$ & N $\frac{1}{2}$ NE $\frac{1}{4}$ SW $\frac{1}{4}$ of section 11 in T137N, R54W Cass County, North Dakota as depicted on the USGS 7.5' Sheldon NW quadrangle map. The proposed project is located on private property.

Description of Proposed Project: The project consists of an Area of Potential Effect (APE), comprised of a proposed segment reroute for a transmission line for Minnesota Power in Cass County, North Dakota. The APE is approximately 92 acres and was inventoried to Class III Standards.

Literature Search Results: Raina Hanley conducted a literature search at the North Dakota State Historic Preservation office (SHPO) on November 18, 2013. A one-mile radius search surrounding the APE was implemented to provide an indication of the types, distribution, and density of cultural resources in the locality of the project area. The search revealed 14 sites, two site leads, and three isolated finds in a one-mile radius of the APE (see Appendix A for tables). There were 12 manuscripts on file for the section in which the APE is located.



Project Personnel: Christina Burns (PI) with Lindsey Reiners, Brittany Brooks and Eric McCann (Staff Archaeologists).

Field Methodology: The APE was inventoried by BCA archaeologists walking parallel linear pedestrian transects between 10-20 meters apart based upon terrain probability for cultural resources. During the survey, field notes and overview pictures were taken and are on file at the BCA main office in Bismarck, ND.

Survey Conditions: Weather conditions consisted of overcast skies and the temperature was approximately 22°F. The APE is located within a harvested field and fallow land. Vegetation in the area consists of corn, wheat and native and non-native grasses, plants, forbs, trees and shrubs. The elevation of the APE is approximately 1,025 feet. During the course of the inventory the ground surface visibility (GSV) was approximately 30-50% on average depending on the location. Areas of higher visibility, such as erosion features, areas of sparse vegetation and rodent burrows were also closely examined for cultural material.

Results and Recommendations: The file search revealed 14 sites, two site leads, and three isolated finds within a one-mile radius of the APE. One previously recorded isolated find (32CSx215), consisting of faunal remains and chipped stone, is located within the APE. Although this isolated find was originally recommended to be unevaluated, there was no site description and the associated site map was of poor quality. Based on the map, the site is located on a hillside and at the bottom of a swale in fallow land and a harvested field. Some of the area has been plowed in the past, and no indication of the isolated find was seen during the pedestrian survey. Since sites are not usually on hillsides, it was probably miss-plotted by the original recorder. Therefore, BCA submitted a site update to recommend the site not eligible for the NRHP based on insufficient information from the site form and the inability to relocate the site. Since it is not eligible for the NRHP, no avoidance is necessary. The field investigation of the APE revealed no cultural resources. Consequently, *No Significant Historic Properties Affected* is recommended and therefore, no further archaeological investigation is needed for the APE as mapped, photographed and described herein.

Appendix A: Tables

Table 3: Manuscripts on file at the Archaeology and Historic Preservation Division, State Historical Society of North Dakota for the section in which the APE is located.

Year	MS #	Author	Location			Title
			Twp	R	S	
1986	3665	Haury, C. <i>et al.</i>	137	53	11	Cultural Resources Survey in the Sheyenne River Drainage (Contribution No. 230, Ransom, Cass, Barnes, & Griggs Co., ND)
2013	14039	AECOM	137	54	11	Archaeological Site Monitoring Year Five (2012) and Streambank & Site Stabilization Maple River Dam Project, Cass County, North Dakota
2011	12994	Ollendorf, A.	137	54	11	Archaeological Site Monitoring Year Five (2011) and Streambank & Site Stabilization Maple River Dam Project, Cass Co., North Dakota
2011	11980	Ollendorf, A	137	54	11	Archaeological Site Monitoring Year Four (2010) and Streambank & Site Stabilization Maple River Dam Project, Cass Co., ND
2001	11350	Stubbs, D. <i>et al.</i>	137	54	11	Cultural Resources Management: Twenty-Nine Archaeological Sites and Site Leads, Proposed Flood Control Dam and Associated Features along the Maple River, ND. Phase II Site Evaluation and Addendum
2007	11193	Ollendorf, A.	137	54	11	Archaeological Site Monitoring, Year One (2007), Maple River Dam Project, Cass Co., ND
2009	11100	Ollendorf, A. and C. Donnelly	137	54	11	Archaeological Site Monitoring Year Three (2009) and Streambank & Site Stabilization Project (32CS0101 and 32CS4478-32CS4504), Maple River Dam Project, Cass Co., ND and Addendum
2008	10674	Ollendorf, A	137	54	11	Cultural Resources Management: Archaeological Site Monitoring, Year Two (2008) Maple River Dam Project, Cass Co., ND
2003	8732	Ollendorf, A. <i>et al.</i>	137	54	11	Cultural Resources Management Testing and Evaluation of 32CS0046, Cass County, North Dakota
1994	6222	Toom, D. and C. Kordecki	137	54	11	Flood damage Assessment Survey of Twenty-Eight Archaeological Sites Along the Cannonball, Heart, James, Maple, Red and Sheyenne Rivers, North Dakota: Final Report
1993	5864	Michlovic, M.	137	54	11	Cultural Resources Survey (Class III) in the Floodpool Area of the Proposed Maple River Dam, Ransom and Cass County, ND
1988	4695	Michlovic, M. and F. Schneider	137	54	11	The Shea Site and the Process of Plains-Woodland Interaction, Cass Co., ND
1988	4602	Michlovic, M. and F. Schneider	137	54	11	The Archaeology of the Shea Site (32CS101)

Appendix B: Pictures



Figure 1: Overview of the APE. View to the Northwest.



Figure 2: Overview of the APE. View to the East.



Figure 5: Site 32CSx215. View to North

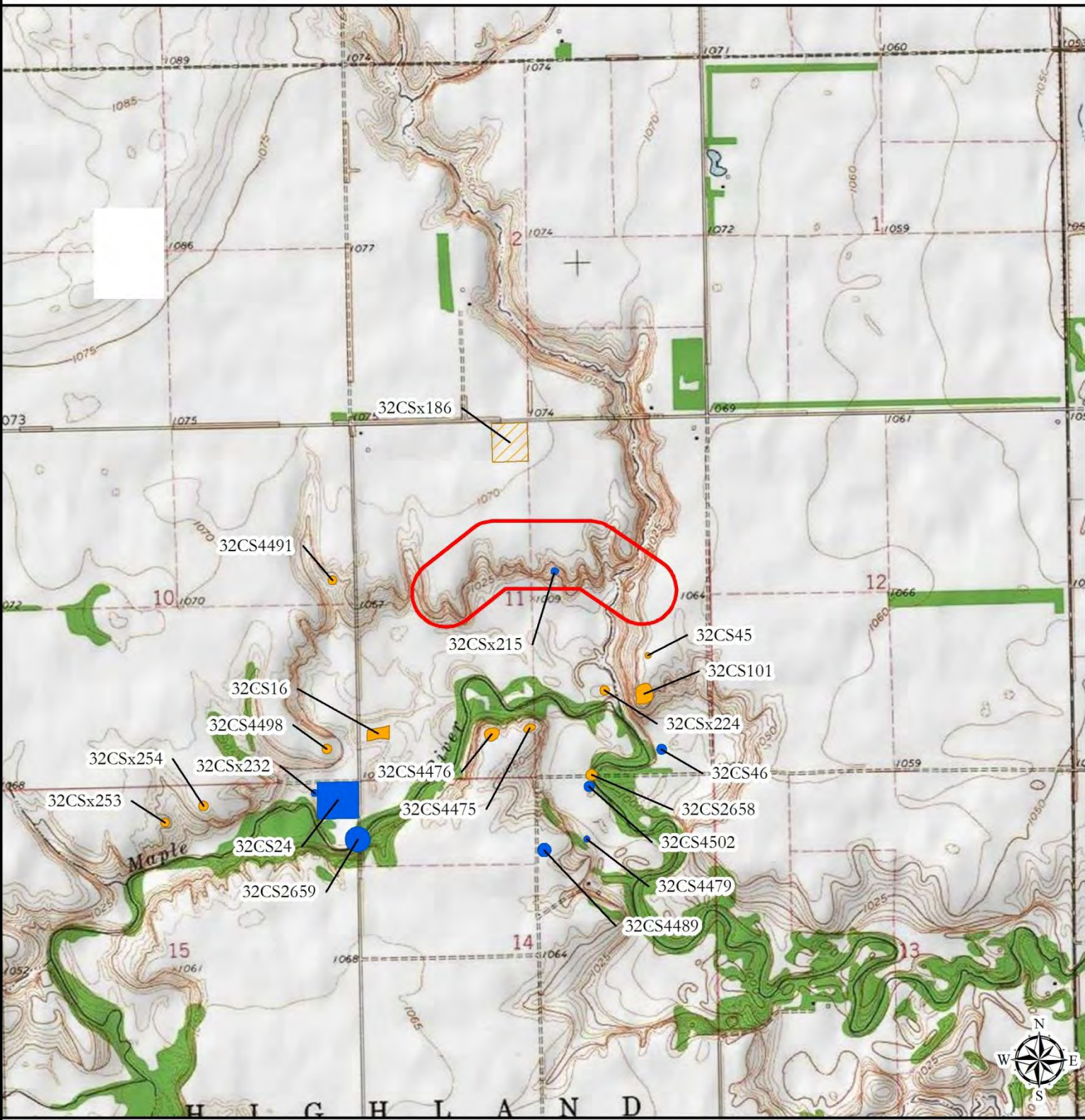
Appendix C: Map



Beaver Creek

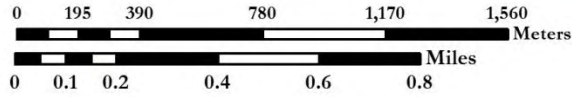
ARCHAEOLOGY

Cass County D.C. Line
Barr Engineering
T137N R54W Section 11
Sheldon NW Quad. Map
Sheyenne River Drainage
Cass County, North Dakota



Legend

-  APE (92 acres)
- Cultural Resources**
-  Eligible/Unevaluated Site
-  Ineligible Site/Isolated Find
-  Unevaluated Site Lead



Base Map: USGS 7.5'
Scale: 1:24,000
UTM NAD83 Zone 14





**STATE
HISTORICAL
SOCIETY
OF NORTH DAKOTA**

Jack Dalrymple
Governor of North Dakota

January 7, 2014

North Dakota
State Historical Board

Mr. Eric Lillestrand
Beaver Creek Archaeology, Inc.
1632 Capitol Way
Bismarck, ND 58501

Calvin Grinnell
New Town - President

A. Ruric Todd III
Jamestown - Vice President

ND SHPO Ref.:14-0495 RUS Minnesota Power's "Cass County D.C. Line West Survey: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota" in portions of [T137N R54W Section 11]

Margaret Puetz
Bismarck- Secretary

Albert I. Berger
Grand Forks

Gereld Gerntholz
Valley City

Dear Mr. Lillestrand,

Diane K. Larson
Bismarck

We reviewed ND SHPO Ref.:14-0495 RUS Minnesota Power's "Cass County D.C. Line West Survey: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota," and find the report acceptable. We concur with a "No Historic Properties Affected" determination, provided the project remains as described and mapped in the above-captioned report.

Chester E Nelson, Jr.
Bismarck

Thank you for the opportunity to review this project. If you have any questions please contact Susan Quinnell, Review and Compliance Coordinator at (701) 328-3576, e-mail squinnell@nd.gov

Sara Otte Coleman
*Director
Tourism Division*

Kelly Schmidt
State Treasurer

Alvin A. Jaeger
Secretary of State

Sincerely,

Mark Zimmerman
*Director
Parks and Recreation
Department*

Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota)
and Director, State Historical Society of North Dakota

Grant Levi
Director

Department of Transportation

Merlan E. Paaverud, Jr.
Director

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*Director
Department of Transportation*

Merlan E. Paaverud, Jr.
Director

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of Museums since 1986*

January 22, 2014

Ms. Mandy Bohnenblust
Barr Engineering Project Manager
4700 West 77th St Suite 200
Minneapolis, MN 55435

NDSHPO REF.: 14-0543 PSC Minnesota Power 250kV Overhead line Reroute in portions of [T137N R54W Section 11] Cass County, North Dakota

Dear Ms. Bohnenblust,

We reviewed NDSHPO REF.: 14-0543 PSC Minnesota Power 250kV Overhead line Reroute in portions of [T137N R54W Section 11] Cass County, North Dakota.

We concur with a "No Significant Sites" determination for the project as described in your correspondence dated January 15, 2014.

Thank you for the opportunity to review this project. If you have questions please contact Susan Quinnell at squinnell@nd.gov or (701) 328-3576.

Sincerely,

Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota)
and
Director, State Historical Society of North Dakota