

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS )  
)  
Petition for a Certificate of Public Convenience and )  
Necessity, pursuant to Section 8-406.1 of the Illinois )  
Public Utilities Act, and an Order pursuant to Section 8- ) Docket No. 12-0598  
503 of the Public Utilities Act, to Construct, Operate and )  
Maintain a New High Voltage Electric Service Line and )  
Related Facilities in the Counties of Adams, Brown, )  
Cass, Champaign, Macon, Clark, Coles, Edgar, Fulton, )  
Macon, Montgomery, Morgan, Moultrie, Pike, )  
Sangamon, Schuyler, Scott and Shelby, Illinois. )

**SURREBUTTAL TESTIMONY**  
**OF INTERVENOR PAULA D. COOLEY ON REHEARING**

**NOW** comes Intervenor Paula D. Cooley, through her attorneys, and files her surrebuttal testimony in this proceeding on rehearing.

**Q: Please state your name?**

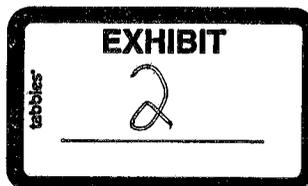
A.: Paula Cooley

**Q: What is the purpose of your surrebuttal testimony?**

A: I would like to respond to testimony from ATXI and Staff concerning what are being called Staff substation recommendations 1 and 2, and the Moweaqua substation. I would also like to supplement what I interpret to be Staff's suggestion that further study is needed before approving the segment between Pawnee and the eastern border of Macon County. I specifically respond to Donnell Murphy's rebuttal testimony on Dec. 2, lines 78-80, wherein claims are made that there are no impediments along these proposed routes.

**Q: What is your response?**

A: It appears to me that ATXI and Staff have not considered the impact of the Very High Frequency Omni Directional Radio Range (VOR) located in Section 22 of Macon County. The



location is specifically identified in the lease that was attached as an exhibit to my rebuttal testimony. Basically, a VOR is a device that broadcasts radio signals which are used by aircraft for navigation. FAA rules and regulations provide that there cannot be steel towers within a certain distance of a VOR because such towers can interfere with the broadcast.

Adriano Bacuita, Airways Transportation Specialist, [adriano.bacuita@faa.gov](mailto:adriano.bacuita@faa.gov) posted a public comment on the ICC's webpage, which is reproduced below, that points out this issue. I have also discovered publicly filed documents in a similar power line case in front of the Minnesota Department of Commerce, PUC Docket No. ET2/TL-08-1474 (copies of which are attached as exhibit 1), wherein part of a proposed transmission line was moved because it passed too close to a VOR. The documents provide a succinct explanation of the federal regulations and why building tall steel power lines around a VOR cannot be done.

May 7, 2013

The transmission lines associated with this project in the Mt Zion/Hervey City/Dalton City will be located near a NAS Navigational Aid (VOR). Has an Air Case Study with the FAA been performed to determine the impact on this VOR in connection with operation of aircraft in this area?

Adriano Bacuita

As pointed out in my rebuttal testimony, ATXI did not perform an Air Case Study.

**Q. What experience do you have with VOR?**

A: I have been a private pilot since 1976 and a licensed Radiotelephone Operator since 1975. Also, this particular VOR is located very close to my home.

**Q. Do you have any other concerns with Donnell Murphy's testimony referenced above?**

A. Yes, substation site #2 drains into the Mt. Zion Drainage District #1. It is very flat ground. As a landowner I am concerned about potential adverse effects this could have on the drainage district.

**Q. How do you think these issues you raise affect the current proceedings?**

A: I believe that this further supports the Commission's decision to deny the Petition for the area between Pawnee and the eastern border of Macon County. A more thorough exploration of options should be made for that segment which includes an air case study and engineering recommendations for surface water detention

**Q. Would you also like to correct a portion of your rebuttal testimony?**

A. Yes. In my rebuttal testimony I referred to Greg Rockrohr's November 13, 2013, testimony. I meant to refer to Staff Exhibit 1.0, p. 39.

DATED this 10th day of December, 2013

By: /s Christopher M. Ellis

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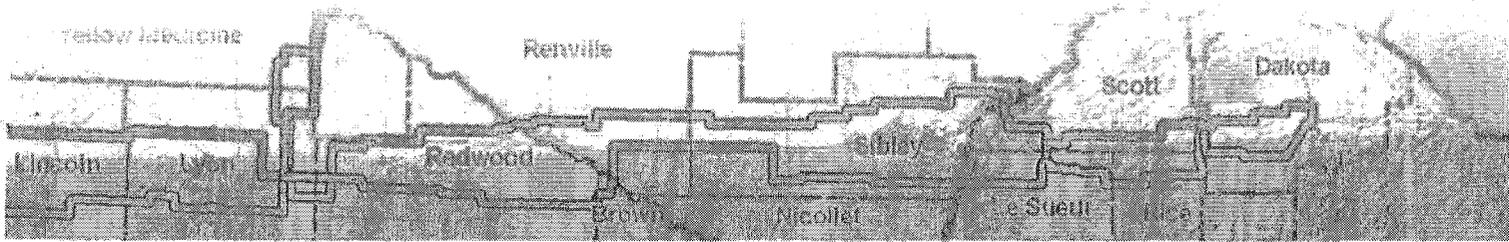
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**PROOF OF SERVICE**

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Paula D. Cooley, herewith certify that I did on the 10th day of December, 2013, electronically file with the Illinois Commerce Commission, Rebuttal Testimony of Intervenor Paula D. Cooley on Rehearing and electronically served same upon the persons identified on the Commission's official service list.

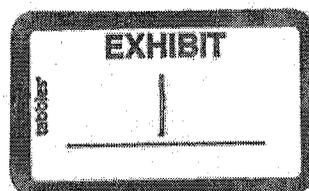
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# Brookings County – Hampton 345 kV Transmission Line Project

Final Environmental Impact Statement  
January, 2010

PUC Docket No. ET2/TL-08-1474



## RESPONSIBLE GOVERNMENT UNIT

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## ABSTRACT

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Pursuant to the provisions of Minnesota Statutes, Chapter 216E (Power Plant Siting Act), Great River Energy and Xcel Energy (applicants) filed a route permit application with the Minnesota Public Utilities Commission (Commission) on December 29, 2008, for a permit to construct the Brookings County-Hampton 345 kilovolt (kV) transmission line facility consisting of a series of 345-kV and lower-voltage transmission line connections between Brookings County, South Dakota, and the southeast Twin Cities, Minnesota (project).

The proposed project includes a 345 kV high-voltage transmission line, approximately 230 to 270 miles long, depending on the route selected, between the existing Brookings County substation near White, South Dakota, and a new substation near Hampton, Minnesota, as well as a new transmission line between the Lyon County substation near Marshall, Minnesota, and the Minnesota Valley substation near Granite Falls, Minnesota. The project also requires the construction of four new substations, the expansion of four existing substations, and construction of electric system interconnections to tie existing high-voltage transmission lines to the project. Construction of the project is scheduled to begin in fall 2011 with an expected in-service of spring 2013.

The Minnesota Office of Energy Security (OES) issued the draft environmental impact statement for the project on October 20, 2009. As required by Minnesota Rule 7850.2500, subp. 9, OES prepared this final environmental impact statement (FEIS). This FEIS

### 1.5 Problematic Route Segments

The following is a list of suggested alternative route segments, alternative route alignments, or portions of the applicant's preferred and alternative routes that were found through further analysis in the EIS to have significantly more impacts and obstacles or were far less superior when compared to other similar routes the segment was intended to replace.

For the reasons stated below, OES staff believes the following alternatives should be removed from further consideration for this project:

6P-01, 6P-04, and 6P-05 – HVTLs can conflict with airport navigation systems such as Very High Frequency Omnidirectional Radio Range ("VOR") and Automated Weather Observation Stations ("AWOS). Federal Aviation Administration (FAA) Order 6820.10 "VOR, VOR/DME, and VORTAC Siting Criteria," specifies the distance setback requirements for VOR's from trees, buildings, and metallic structures. These regulations specify that overhead transmission line structures with conductors should be located beyond 1,200 feet of the VOR antenna to avoid communication interference. Additionally, metallic structures are required to subtend vertical angles of 1.2 degrees or less, measured from the ground elevation of the VOR facility. Therefore, according to these FAA guidelines, a VOR air navigational station should not be located within 6,206 feet away from a 130 foot high steel structure in order to avoid potential interference with the operation of the facility. Structures of 175 feet in height should be 8,354 feet away from a VOR.

The location of the Airlake Airport VOR (which is located outside the airport itself) is shown on map in FEIS appendix C, Map (FEIS ID# 262b). As illustrated by this map, route alternative 6P-05 crosses within 50 feet of this VOR. As a result, this alternative is not a viable option. Likewise 6P-04 is just outside the 1,200 foot transmission line setback, making this alternative route an unlikely option also.

Finally, alternative route 6P-01 runs about 4000 feet away from the Airlake Airport VOR, so this route falls within the 6,000-8,000 foot FAA structure setback recommendation. Determining whether there is a transmission line structure option along this route that would be acceptable to the FAA could only be made by filing a notice request from the FAA and /or MN/DOT. The applicants would need to file all necessary notice requirements with FAA and work with both FAA and MN/DOT to ensure compatibility between the transmission lines and air navigation stations and equipment during detailed design should this route be selected in this area.

5P-03 – This alternative route segment would entail running along County Highway 2/Main Street from Jonquil Avenue through the city center of Elko New Market to Interstate 35. There are a combination of variables that make this alternative route



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November 17, 2009

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Office of Energy Security  
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St. Paul, MN 55104-2178

Re: DEIS for Brookings or Hampton 315kV Transmission Line Project  
Comments from the City of Farmington

Thank you for the opportunity to review the Brookings County/Hammond 315 kV Transmission Line Draft Environmental Impact Statement (DEIS) dated October 2009. We are commenting on the DEIS, specifically on Section 6.1.6, Table 6.1.6, and the associated text regarding the proposed alignment. We understand and appreciate the effort to coordinate this important facility and are willing to offer to support the identification of potential conflicts. We will continue to work with you on this project as needed. The DEIS is a good first step in providing information to the public on the project and we appreciate the DEIS. We will continue to work with you on this project as needed. We will continue to work with you on this project as needed.

We offer the following comments and observations on these three alternatives:

**262a**

- DEIS Section 6.1.1 - Project Settlement - Visual Impacts**  
Farmington has growing community with a current population close to 20,000. The population doubled between 1990 and 2000 and continues at a rapid pace. It possesses a traditional downtown area, new growth housing areas, farms, open space and natural resources such as the South Creek of the Vermillion River. The alternative alignments would be visible to many residents and businesses and have a significant impact on the character of the City.

There is already an existing HVTL along CSAH 50 and Denmark Avenue as it relates to 65-41 and part of 47-95. Installing another line would create a similar row of three structures through the area. These lines would create potential visual impacts to farms, schools, and churches. Mitigation for visual impacts potentially involves screening and/or planting the project in an area with minimum impact. Due to the height of the transmission towers, screening is not possible and therefore planting the towers within the City of Farmington will have a negative impact on the character of the existing community. The impact on having another HVTL on the westside for these alignments should be discussed in the EIS.

**262b**

- DEIS Section 6.1.3, 6.1.4 and 7.6 - Residential Development and Displacement**  
There is significant impact on residential properties associated with all lines of the route that pass through the City of Farmington. These lines cross all border streets with a considerable number of residential properties. It appears from maps and aerial photos, these are more houses within the 1,000 foot radius width than indicated in the DEIS in Farmington. This is evident in the table below. Additionally, there are houses already under the proposed route of 65-29 where it angles away from 47-95. Further, some of the residences listed in the DEIS are multi-family dwellings, thus impacting these people. Other additional impacts need to be included in the EIS.

**262a.**

Section 6.1.6 (Existing Utilities) does address the potential conflict with existing utilities to the extent that "The applicants have stated they would work with landowners and the rural utility providers to avoid direct or indirect impacts to public utilities," and "It may be necessary for the applicants to work with other public service utilities to relocate their facilities if they conflict with the location of the transmission line."

In addition, Page 6-18 of the applicants' RPA indicates, "The proposed structures would be between 130 and 175 feet tall, typically located just outside the public road ROW. Many of these roads currently do not share a right-of-way with a transmission line, with the exception of power distribution lines serving rural residences and farmsteads. However, the Preferred Route would share right-of-way for short distances in several locations, typically collocating with other routes at entrance and exit points to substations."

An example similar to the city of Farmington's concern with regards to County State-Aid Highway (CSAH) 50 and Denmark Avenue is discussed in the applicants' RPA on page 6-29 and states, "In Dakota County a home-

Options	Residences by 150' ROW in EIS	Residences by 150' ROW for City option	Residences in 1,000' corridor within the 225' ROW	Residences in 1,000' corridor within City ROW
0P-01	0	0	31	33
0P-02	0	0	0	0
0P-05	1	2	16	16

Further, while not all of the houses on Ash Street are within the proposed ROW of 0P-05, one more of them are currently close (within 5 feet) to the ROW and if this more were in the design, they would be displaced.

Not only are there existing structures impacted by the route, but all three routes border areas identified by our studies to be high density residential development (R-8 - 12.0% dwelling units) in the City's Future Land Use Plan. The construction of route 0P-01, 0P-04 or 0P-05 in Fanningtown would likely result in portions of these parcels being undeveloped or severely limited development potential as planned in the City's approved Comprehensive Plan. This is a major impact and a concern of the City of Fanningtown and authority the Met Council, who has approved the City's Comprehensive Plan and zoning activity.

**2622c** **3.** **DEIS 6.1.4 and 7.6- Displacement of Non-Residential Buildings.**  
 The DEIS states that buildings would not be allowed within the 150 foot ROW. There are a number of them including and other structures along CSAM 50 and Democrat Avenue (including the City's Fire Station) that are extremely close (within 5 feet) of the 150 ft. ROW that would be affected by this and are not included in the DEIS. Further, the street's very high frequency omnidirectional radio range (VOR) is located directly within the path of 0P-02 to the front yards of Ash Street. This will have a significant impact on this segment as well as impact in the region. This impact should be included in the EIS.

**2622d** **3.** **DEIS 6.1.0 and 7.6- Utilities.**  
 The DEIS states that construction of the project is not expected to affect any public utilities. However, there are a number of public and private utilities located within the 150 foot ROW and the 1,000 foot ROW width.

**Public Sanitary Sewer:** The City of Fanningtown recently constructed a 21-inch sanitary sewer line along the west side of Democrat Avenue. There is also a 20-inch sewer line along the north side of CSAM 50 between First Basin Road and Democrat Avenue. Further, the Met Council has a 42-inch interceptor line that extends from the border with Fanningtown to the east crossing rd/pavement 0P-04 and 0P-05 to the intersection of CSAM 50 and Democrat Avenue. The MCHS is investigating a meter for this interceptor within the 0P-02 alignment on the western border of Fanningtown.

**Public Water Main:** The City has a transfer of existing and proposed water main lines within the 150 foot ROW and 1,000 foot wide ROW. The existing water main is located along CSAM 50 from near the western border of the City in Democrat Avenue and along Democrat Avenue from CSAM 50 to just north of 720<sup>th</sup> Street. The City has proposed water main line alignment 0P-04 alignment and water main that will cross under the 0P-05 alignment.

based daycare facility is located along TH 3/ Chippendale Avenue West south of the City of Fanningtown. Electric distribution lines, cable television and telephone lines are located along each of the roads the Preferred Route would follow, providing service to the adjacent homes and businesses. These lines do not present a barrier to construction and operation of the transmission line. It may be necessary for the applicants to work with other public service utilities to relocate their facilities if they conflict with the location of the transmission line. All potential routes are likely to present potential conflicts with other utilities that will have to be addressed during detailed design.

**2627b.**

House locations and numbers (within 500-foot) were reviewed again for the FEIS. The updated house counts (modified slightly from DEIS) and the methods used to produce these data are provided in Appendix F. In addition, we did count multi-unit dwellings where individual units—such as townhomes—were distinguishable. Because the route centerlines we used to calculate the house counts and other methodology differences, our house

\* **Other Utilities:** There is buried underground cable both north and south along CSAM 30 and 31 along CSAM 34 and Denmark Avenue. The Northern Natural Gas Company is located in the northwest quadrant of CSAM 30 and Denmark Avenue. There are existing HVTL power lines along the east side of CSAM 30 and the east side of Denmark Avenue. Xcel Energy has a substation at the southeast quadrant of CSAM 30 and Denmark Avenue.

Construction of 345 kV transmission lines as shown in alternative 61-01/03 through Farmington would be difficult on the corridor because of existing public utilities. Additional transmission lines would not only be difficult to locate in the corridor, but the ability to access and maintain all utilities in the Highway would be compromised. Transmission lines considered near public utilities such as sanitary access and water mains must be located sufficiently far away from the utility so that access and maintenance can be maintained to the pipeline and manholes. HVTL lines cannot be shielded to prevent stray from backlashes or other construction equipment, thereby holding effective access to existing systems and conducting planned improvements. Also elevated towers should be a minimum distance away from the pipeline so the utility can be dug up without undermining or adversely affecting the base of any electrical tower. This should be determined on a case by case basis, but in general could be around 35-feet in spacing. Working around or relocating these facilities and the associated underground utilities in this area will make the 61-01/03 option prohibitively expensive and impact the City's existing and proposed infrastructure. These impacts need to be addressed in the EIS.

262b

5.

**DEIS Section 6.1/6.2 7.a - Land Use Compatibility and Land-Based Economics**  
The DEIS recognizes the land use impact of 61-01, 61-03, and 61-03 on future land use in the City. Farmington is a fast growing suburban community that has grown to population by 5% from 2000 to 2008. With the rapid growth comes significant pressures of infrastructure and economic development. All the proposed routes in Farmington are within or adjacent to the current Metropolitan Urban Service Area (MUSA) for some or most of their length. The MUSA is now growing as controlled by the Metropolitan Council and the City has designated these areas for commercial, business, and residential development to meet the Met Council's density requirements. Considering these areas for use as HVTL ROW significantly impacts density and development goals for the City set by Met Council, disrupts economic development, and requires the years of planning conducted by the City and the residents in this area. The cost of the project is significant in itself, but more significant is the loss of the many people however.

\* **Business:** There are a number of businesses within the City of Farmington affected by the 61-01 and 61-03 routes passing through the City. While none of these businesses are within the 150-foot ROW, many of them are within the 1000-foot route width. The table below outlines the buildings footprint of the commercial and industrial buildings in Farmington.

Option	Commercial Building Footprint with 1000' route width	Industrial Building Footprint with 1000' route width
61-01	147,260 SF	28,650 SF
61-03	0 SF	0 SF
61-05	7,800 SF	83,650 SF

Most city new built existing structures impacted by two of the routes, but all three routes, particularly identified for new commercial, industrial, and residential development in the City's newly adopted Comprehensive Plan. The construction of route 61-01, 61-03 or 61-05 would likely have these projects less desirable and thus impact economic development in the City.

\* **School:** Route 61-01 is proposed along Denmark Avenue and passes by Breckner Middle School. This school currently has 731 students enrolled and capacity for 1,000 students. Along with the students, there are approximately 40 teachers and staff working in the school. Well over half of the kinetic for this school sits within the 1500-foot route width for the transmission line.

counts may not match precisely with the City of Farmington's.

262c.

We have prepared a map of the commercial buildings within 150-foot and 500-foot of the initial route centerline in this area that is provided in Appendix C, map FEIS ID#262a. The location of the fire station, for example, is shown on this map.

262d.

Section 6.1.6 (Existing Utilities) does address the potential conflict with existing utilities to the extent that, "The applicants have stated they would work with landowners and the rural utility providers to avoid direct or indirect impacts to public utilities." and, "It may be necessary for the applicants to work with other public service utilities to relocate their facilities if they conflict with the location of the transmission line." (See response to FEIS ID#262a).

262e.

The DEIS does provide overall socioeconomic and human settlement data for each segment analyzed in Section 7.0 of the document. See also response to FEIS ID#262c.

The Christian Life School is located on the south side of CSAH 50. This school has 301 students in kindergarten through 12<sup>th</sup> grade as well as in their pre-school program. In this area, route 67-01 will pass by the school on CSAH 50. The 1,000-foot setback from route 67-01 satisfies a portion of the setback of the building for this school. Additionally, route 67-01 is proposed on the southern portion of the property for this school. There is a structure completely contained within the 1,000-foot setback from this road.

Based on the proximity of the proposed alignments of alternatives 67-01 and 67-02 to schools in this area, the City does not believe that these alignment options are appropriate. While the public mentions that no significant health impacts have been observed from these types of transmission lines, many people mentioned concerns especially relating to children.

**Religious Institutions:** There are two churches that lie in the 1000-foot setback width for these transmission lines. The Christian Life Church is located on the south side of CSAH 50 in the same location as the Christian Life School. The facility used for worship is completely within the route width for route 67-01. Alternative 67-02 passes on the south side of the property for this church. This church has 123 members and average attendance for worship around 300 people.

The Church of Saint Michael is located on Denmark Avenue & Ash Street. The entire property of this church falls within the 1,000-foot setback width of both route 67-01 and route 67-02. This church has approximately 1,400 members and average attendance for worship around 800 people.

The City does not consider any of these three alignments to be suitable based on their proximity to these two churches.

**EIS Section 6.2 - Airport**  
The City of Farmington is not within the city limits of Farmington. It is close proximity to the City and this subject to the same rules reviewed and significant and worst included in this letter. It should also be noted that additional impact analysis is required in the EIS for the airport as 67-02 is aligned so that it impacts the airport's very high frequency conventional radio range (VOR). This would have significant reduction impacts for the VOR and impacts on communication for the local airport as well as any airports in the region. This needs to be addressed in the EIS.

All these routes run along 21<sup>st</sup> Street in the vicinity of the airport. These portions of the routes lie within the 100-foot right-of-way and secondary clearance zones for the airport. The FAA's setback rules in this area are 100-foot in height. The standard for a pole carrying 25kV Transmission Lines is 175-foot. In the route selection process, several alternative poles were considered as well as consideration for burying the line in this segment. These options were not found to be feasible or cost effective and, therefore, not recommended.

The public objection process concluded that development in vicinity of the airport was not recommended because of technical, visual, and additional impacts. The City believes that supporting these conclusions and believes that these objections are not valid based on the proposed alternatives for the airport.

**EIS Section 6.1.16.12 - Wetland / Water Features / Flora and Fauna**  
May 7 & 30 in the EIS does not adequately address temporary and permanent wetland impacts in the City of Farmington. There are many wetland ecosystems for 67-01/67-02 for Farmington, but are not listed as wetland impacts. These impacts need to be analyzed more fully in the EIS, especially since the routes are crossing wetlands associated with trout streams. Further, these wetlands are designated as a greenway corridor and protected in the City's Wetland Management Plan (see below). Information should be provided in the EIS if access roads to each tower will need to be constructed and if this is anticipated to impact wetlands.

The City's Wetland Management Plan was completed in 1997 and updated in 2006. A map from the Plan has been attached to these comments for reference. The proposed alignments cross many wetlands that are

2626. First, regarding the runway flight path, the height of the transmission lines would be restricted to approximately 150-feet, which is feasible.

However, as the comment indicates, there is a Very High Frequency Omnidirectional Radio Range ("VOR") air navigation systems and Automated Weather Observation Stations ("AWOS") located in this area. FAA Order 6820.10 "VOR, VOR/DME, and VORTAC Siting Criteria," specifies the distance setback requirements for trees, buildings, and metallic structures. These regulations specify that overhead transmission line structures with conductors should be located beyond 1,200 feet of the VOR antenna to avoid communication interference. Additionally, metallic structures are required to subtend vertical angles of 1.2 degrees or less, measured from the ground elevation of the VOR facility. Therefore, according to these FAA guidelines, a VOR air navigation station should not be located within 5,205 feet away from a 150 foot high steel structure in order to avoid potential interference with the operation of the facility. Structures of 175 feet in height should be 8,334 feet away from a VOR.

classified as "Trees" and the classification indicates that these are high-quality wetlands. The City has specific standards for all of these wetlands, which are more restrictive than State and Federal rules. Based on the National Wetlands Inventory, we estimated that each alternative will cross the following wetland acreage within the City:

Alternative	25-foot RORP width	1,000-foot route width
6P-01	1.8 acres	14.6 acres
6P-04	5.0 acres	11.6 acres
6P-05	2.1 acres	1.3 acres

Both direct and indirect impacts to these wetlands, especially the "protect" standards, need to be more fully explored in the EIS. Because of these impacts, three alignment options are not being alternatives.

2621

8. DEIS 6.1.5 - Trees and Woodlands

The DEIS indicates that retaining the amount of tree and wetland removal was identified as important during many of the public meetings. Many of the wetland crossings for 6P-01, 6P-04, and 6P-05 would cross areas which provide habitat in the area. Additionally, there is an existing wetland in the field associated with the 6P-04 alignment. Trees would either need to be fully removed or sprayed to accommodate the HWY. In these areas, plans resulting in a negative impact on residents and wildlife in the area.

9. DEIS Section 6.5 and 7.6 - Archeological and Historic Resources

The City of Hampton is rich in historic architecture. The three routes all impact historic resources within the City. Sites were identified in the DEIS that were within one-half mile from the center line shown on the map for these transmission lines. There were 20 sites identified for alternative 6P-01, 15 for alternative 6P-04 and 12 for alternative 6P-05. While it is understood that the DEIS has not specifically identified the names and location of these resources due to their sensitive nature, it should be noted that the City is concerned about impacts on these resources and does not see that mitigation of these impacts is feasible based on the proposed impact.

2621

10. DEIS Section 6.8 - Parks/Recreation Areas

The Randolph River Park is located to the east of Denmark Avenue near the South York of the York River. This park has many facilities including recreation fields. Two of the baseball fields located on the park are within the route width of 6P-01. There are two additional baseball fields just north of the Randolph River Park on the west side of Denmark Avenue and CSALT 20. This property is owned by the Farmington School District. One of the baseball fields at this location is within the route width of 6P-01.

The South York of the York River is also identified as a Trout Stream in the area crossed by all alternatives 6P-01/04/05. This river is utilized by fishermen and provides recreational opportunity and is directly impacted by these alternatives.

There is a paved trail along the north side of the length of CSALT 20. Additionally, the City is constructing a trail on the south side of CSALT 20 near Denmark Avenue. This area will provide recreational uses for walkers and bikers and should be identified in the EIS.

2621

11. DEIS Section 6.12 and 7.5 - Wildlife

Wildlife impact assessment was not conducted for wetlands, but wetlands and transmission lines have not been analyzed for impacts on birds and bats. However, impacts can be reduced if construction lines are placed in areas where wetland habitat for wildlife is less present. The alignment options in the City of Farmington cross a number of wetland and greenway corridor areas. These areas are prime habitat for birds and other wildlife. Placing the transmission lines habitat areas will continue to disrupt the habitat as well as increase the likelihood of bird and bat collisions. Choosing alignments that have less suitable habitat would reduce this impact.

The location of the Airake Airport VOR in this area and the applicable setbacks is shown on map FEIS ID#262b in Appendix C. As

illustrated by this map and the comment, route alternative 6P-05 crosses within 50 feet of this VOR. As a result, this alternative is not a viable option. Likewise 6P-04 is just outside the 1,200 foot setback, making this alternative route an unlikely option also. Finally alternative route

6P-01 runs about 400 feet away from the VOR, which is within the FAA structure setback recommendation. A definitive decision on

what the acceptable height of a transmission line structure or design would be for this route segment could only be made by filing a notice request from the FAA and/or MN/DOT. The

applicant would need to file all necessary notice requirements with FAA and work with both FAA and MN/DOT to ensure compatibility between

the transmission lines and air navigation stations and equipment during detailed design should this route be selected.

262g

The detailed wetland data used in the DEIS is provided in Appendix B of the FEIS (FEIS ID#46). In addition, the detailed maps of the NWI wetlands in the vicinity of the property near

Thank you for the opportunity to comment on the DEIS. If you have questions or wish to discuss these responses with City Staff, please feel free to call me at 651-280-8620.

Sincerely,  
City of Farrington  
  
Lee Saito, AICP  
City Planner

Farrington are shown on Figures LH7A and LH7B in Appendix A of the DEIS. Wetland data in the DEIS are based on the National Wetland Inventory. No wetland delineations will be conducted until a route has been chosen where necessary. Therefore, the DEIS wetland data may not match the City of Farrington data precisely. See also response to FEIS ID#188a.

262h.

Comments noted.

262i.

The DEIS maps note the locations of publically available data of locations of local parks, streams, and similar resources available at the time the RPA and DEIS were completed. The additional existing or planned park and facilities highlighted in the comment are noted.

262j.

Comments noted.