

**Appendix E      Correspondence related to Minnesota Department of  
Transportation Facilities**



Office of Land Management  
395 John Ireland Boulevard  
Saint Paul, MN 55155  
MS 678

March 6, 2024

Richard Davis, Environmental Review Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
Saint Paul, MN 55101

RE: In the Matter of Application of Great River Energy for a Route Permit for the 115-kV Pilot Knob to Burnsville Rebuild and Upgrade Project in Dakota County, Minnesota  
PUC Docket Number: ET-2/TL-23-410

Dear Mr. Davis,

On February 9<sup>th</sup>, 2024, the Minnesota Public Utilities Commission (Commission) and the Minnesota Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping Meetings on Great River Energy's (Applicant) route permit (RP) application for the Pilot Knob to Burnsville 115-kV Transmission Line Rebuild and Upgrade Project (Project). The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

Based on the information provided in the RP, information provided in MnDOT's Early Notification Memo (ENM)<sup>1</sup> request, and from conversations with the Applicant, the proposed Project will impact Minnesota State Trunk Highways (TH) 13 and 77, and Interstate (I) 35E. MnDOT has met with Project staff to discuss the project's potential effects on the state trunk highway system. This information is represented in [Appendix D](#) of the Project RP application. MnDOT's full project review, including mitigative suggestions, recommendations, permit requirements, and overall impacts are reflected in this submission.

#### Planning

Because MnDOT's highway construction activities could impact the Applicant's overall project plans, or plans to haul oversize loads to the proposed site(s), the Applicants will need to coordinate with MnDOT when planning such loads. The funding and timing of these projects can change and therefore, the Applicants should regularly check the project planning sites for MnDOT [Metro District](#). This coordination includes, but is not limited to, State Project construction, holiday travel restrictions, seasonal load limits, vertical and width restrictions and updates to escort requirements for oversized vehicles [Chapter 100 - MN Laws](#). Additional MnDOT District Planning comments can be found in *Attachment 1* of this letter.

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<sup>1</sup> MnDOT has created an ENM form to aid project proposers/Applicants in identifying and providing information on areas of potential project-specific impacts that are relevant to our agency and require additional review.

## Office of Environmental Stewardship

As a standard part of our review process, all applicable MnDOT utility permit applications are subject to review by our Office of Environmental Stewardship (OES). These reviews may result in additional construction criteria, extended permit review times, utility permit special provisions, and/or a request to move portions of a planned project outside of any given area of concern. A summary of each OES resource group's comments, recommendations and requirements pertaining to various environmental resources is provided in *Attachment 1* of this letter. Attention should be paid to MnDOT's requested deliverables that may be required for future utility permit application approvals.

## Expected Permit Requirements

The Applicants and their contractors should familiarize themselves with both MnDOT's Utility Accommodation on Highway Right of Way Policy and Utility Accommodation and Coordination Manual, both found here: [MnDOT Policy and Guidance Utility Agreements & Permits](#). Aside from required MnDOT utility permits for any pole placement that may occur, MnDOT utility permits are also required for any aerial encroachment of the state trunk highway right-of-way system, including aerial transmission lines crossings, aerial encroachment from cross arms, and transmission line conductor movement envelope or "blowout." To avoid driver sight distance impairment, poles may not be placed within sight corners of at-grade road crossings. To allow adequate clearance for maintenance and construction activities, poles are to be placed at a 50-foot minimum from the six bridges within the project area. Except in areas of controlled access<sup>2</sup>, trunk highway collocation requires poles be placed outside of clear zones and within the outer 5 feet of the road right-of-way, wherever possible and practical. Applicable and enforceable MnDOT Special Provisions are attached to all issued utility permits. MnDOT reserves the right to conduct post-construction inspections on MnDOT right-of-way to verify compliance with Commission and MnDOT permit conditions. Expanded utility permit requirement language is provided in *Attachment 1* of this letter. It is the Applicant's responsibility to use MnDOT mapping to show their proposed work along with all existing utilities within the affected highway rights-of-way. These maps should accompany all MnDOT permit applications at the time of submittal - [MnDOT Permit Forms](#). The Applicants may also need to apply for oversize/overweight hauling permits during construction of this project. OSOW hauling information and permit applications can be found here: [OSOW Permits](#).

Should the Commission issue a route permit for the Project, continued coordination with our agency is strongly encouraged. Any MnDOT permits applied for as a part of the Project may not be issued until the Commission has issued an approved route permit. MnDOT District Specialists should be given the opportunity to participate in pre-construction meetings as they apply to MnDOT-owned property. All applicable permitting, [traffic control](#) and construction coordination efforts should be made through Buck Craig, Metro District Engineering Specialist Senior at 651-775-0405 / [buck.craig@state.mn.us](mailto:buck.craig@state.mn.us).

MnDOT has a continuing interest in working with the Commission, the DOC EERA, and the Applicant to ensure that possible impacts to the entire state trunk highway system, traveling public and environmentally significant areas of concern are adequately addressed.

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<sup>2</sup> The condition where the right of owners or occupants of abutting land or other persons to access, light, air, or view in connection with a highway is fully or partially controlled by public authority. (Minnesota Statutes § 160.08.)

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ *Stacy Kotch Egstad*

Utility Routing and Siting Coordinator  
Minnesota Department of Transportation  
Office of Land Management  
[stacy.kotch@state.mn.us](mailto:stacy.kotch@state.mn.us)

*Attachment 1: MnDOT OES & Functional Group Comments and Recommendations*

cc: Buck Craig – MnDOT Metro District Permits  
    Tod Sherman – MnDOT Metro District Planning Director  
    Paul Hartzheim – MnDOT Environmental Review Specialist

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# ATTACHMENT 1

**GRE PILOT KNOB – BURNSVILLE 115KV TL-23-410**

**MNDOT OES & FUNCTIONAL GROUP COMMENTS**

Resource	Comments
<b>Federal and State-listed Protected Species</b>	The Applicant should consult with the U.S. Fish and Wildlife Service (USFWS) with respect to listed species which may occur within the project area, and limit ground disturbances to the extent practical in areas of semi-natural or natural vegetation. State-listed threatened and endangered species may be located along portions of the route along MnDOT right-of-way (ROW). We recommend the Applicant consult with the Minnesota Department of Natural Resources (MDNR) to identify recorded locations and conduct species-specific surveys prior to construction to confirm locations prior to identifying pole placement and temporary workspaces. MnDOT requests copies of all biological field survey data/reports within its ROW be submitted to MnDOT.
<b>Federal and State-listed Protected Species</b>	Herbicide use must be minimized during construction and future maintenance occurring on MnDOT ROW. If used, herbicide must be applied via hand-held spot treatments applied to individual plants. Avoid broadcast applications of herbicides without further consultation to MnDOT Office of Environmental Stewardship. Restrict all activities to avoid the application of insecticides and fungicides on MnDOT ROW.
<b>Federal and State-listed Protected Species</b>	<p><b>*If project is within or near (one half-mile) a High Potential Zone for Rusty Patch Bumble Bee*</b></p> <p>The proposed project, at the time of this review, falls within or near a USFWS identified High Potential Zone (HPZ) for the federally endangered rusty-patched bumble bee. Note the USFWS updates these boundaries annually, typically in March. The Applicant and its contractors must consult the USFWS HPZ map (<a href="https://www.fws.gov/species/rusty-patched-bumble-bee-bombus-affinis/map">https://www.fws.gov/species/rusty-patched-bumble-bee-bombus-affinis/map</a>) each spring to ensure project activities occurring in MnDOT right-of-way remain outside of an USFWS identified HPZ for the rusty-patched bumble bee. Contact MnDOT OES at <a href="mailto:protectedspecies.dot@state.mn.us">protectedspecies.dot@state.mn.us</a> immediately if the project is now within the boundaries identified by USFWS.</p>
<b>Federal and State-listed Protected Species</b>	The Applicant must establish native vegetation in areas that are not proposed to be mowed more than once per year, and must include mowing and spot treatment control to establish seeded vegetation, as shown in the MnDOT Seeding Manual (see <a href="http://www.dot.state.mn.us/environment/erosion/vegetation.html">http://www.dot.state.mn.us/environment/erosion/vegetation.html</a> ).

<p><b>Avian Protection</b></p>	<p>The Applicant should minimize tree clearing/trimming within MnDOT ROW to extent possible. Tree clearing may be restricted to winter months (November 15 - March 31). On MnDOT ROW, additional tree clearing restrictions will typically be included in MnDOT's utility permit. If construction activities occur within the nesting season for migratory birds, conduct pre-construction nest surveys. If active nests are discovered, implement a Migratory Bird Plan to avoid and minimize impacts.</p> <p><b>*If eagle nests are documented in the vicinity of project*</b></p> <p>Eagle nests are documented in the vicinity of the project. Additional surveys are encouraged and coordination with the USFWS may be required. Construction activities may be restricted within a certain radius if the nest is deemed to be active.</p>
<p><b>Contaminated Materials Management</b></p>	<p>It is the responsibility of the Applicant to identify the potential to encounter contaminated materials (soil/groundwater/vapor) on or within 500-feet of MnDOT ROW. The Applicant should provide to MnDOT all environmental due diligence documents (e.g., desktop review, Phase I Environmental Site Assessments, Phase II), as applicable/available. If access or sampling is proposed in MnDOT's ROW, a permit will be required (see <a href="https://www.dot.state.mn.us/utility/forms.html">https://www.dot.state.mn.us/utility/forms.html</a>).</p> <p>Contaminated materials encountered during any work within MnDOT ROW is required to be managed in accordance with applicable federal/state and location regulations and/or guidance documents.</p>

<p><b>Roadside Vegetation Management</b></p>	<p>Pesticides: Require Applicant to develop a Vegetation Management/Pesticide/Revegetation Plan and submit for MnDOT review/approval. Any proposed pesticides and application rates should be submitted to MnDOT for approval (NOTE: Use of herbicides or similar chemistries may be limited to spot treatments via hand tools only [i.e., no equipment mounted broadcast applications]).</p> <ul style="list-style-type: none"> <li>• Herbicide used on MnDOT ROW must be labeled for use on rights-of-way.</li> <li>• Pesticide applicators must be state- certified in Categories A and J (see: <a href="https://www.mda.state.mn.us/pesticide-fertilizer/pesticide-applicator-license-types">https://www.mda.state.mn.us/pesticide-fertilizer/pesticide-applicator-license-types</a>)</li> <li>• Herbicide records for work on MnDOT's ROW must be provided to the local MnDOT District Office</li> </ul> <p>Noxious/Invasive Weeds: Prior to construction, the Applicant should conduct a field survey for noxious weeds in all project workspaces. If any state prohibited or county designated noxious weeds (<a href="https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list">https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list</a>) are identified within installation limits on MnDOT's ROW, the Applicant must submit its Invasive Species Prevention Plan to the Office of Environmental Stewardship-Roadside Vegetation Management Unit for review and approval. All efforts must be made to prevent transportation of propagative parts to new areas. Movement of propagative parts of these plants is prohibited by Minnesota Statutes, Section 18.82. If transportation of soil or plant parts from the site are necessary, a transportation permit will be required. Questions regarding noxious weed law or noxious weed transportation permits can be directed to the Minnesota Department of Agriculture at <a href="mailto:noxiousweeds.mda@state.mn.us">noxiousweeds.mda@state.mn.us</a>.</p> <p>Native vegetation: Parking, staging, and operating equipment in this area should be kept to a minimum level to accomplish the installation. Parking of vehicles or equipment not directly required for the utility installation in this area should be restricted and remain on the road surfaces. Failure to adhere to the above recommendations may lead to unnecessary damage and compaction of native plants and soils.</p> <p>Restoration: If areas are disturbed on MnDOT's ROW, the area must be restored to a similar vegetation cover, except when that vegetation will endanger safe operation or maintenance of the utility/facility. Seeding should match existing surrounding vegetation, and native seed must have a yellow tag through the Source Identified Native Seed Program. Any seed that is to be planted on MnDOT's ROW must be a mix approved in MnDOT's seeding manual: <a href="https://www.dot.state.mn.us/environment/erosion/pdf/seedingmanual.pdf">https://www.dot.state.mn.us/environment/erosion/pdf/seedingmanual.pdf</a>.</p>
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Woody Debris Management - Tree and brush clearing can only occur between November 15th and March 31st. The Applicant will dispose of trees, brush, stumps, roots, and other debris or byproducts by chipping, tub grinding, or marketing. Chip/mulch can be used as erosion control for the project, however, any mulch/chip and debris not used will be removed from the right of way. If stumps are not ground out, they must be cut no higher than 3 inches above the ground line and treated with an approved herbicide labeled for use on rights of way to inhibit re sprouting. If the stump is treated, the Applicant must submit a record of herbicide application to the MnDOT Authorized Representative. Marketable trees are defined as all trees except elm, oak wilt infected oak trees and ash. Dispose of ash, pine, elm, and oak wilt infected trees in accordance with proper forestry disposal standards to prevent the spread of insects and disease. For trees designated to remain during operations, if soil excavation must take place within the tree(s) dripline, the Applicant will cleanly cut all tree roots along the excavation limits in accordance with MnDOT Standard Specification 2572.3A.2. If during the Applicant's operations it exposes or damages roots on trees designated to remain, immediately and cleanly cut damaged and exposed roots and place topsoil over the exposed area. If the Applicant wounds a tree designated to remain, they must notify the MnDOT Authorized Representative.

MnDOT reserves the right to conduct its own inspection on MnDOT ROW (during and post-construction) to verify restoration status prior to the Applicant filing their Notification of Restoration Completion with the Commission.

<p><b>Wetlands Coordination</b></p>	<p><u>Specific comments:</u> Please note that in its role as the Wetland Conservation Act LGU within MnDOT ROW, MnDOT OES requires either (a) a Level 2 wetland delineation to be completed within the TH ROW areas where permanent impacts are proposed (pole placement as well as other permanent fill, excavation, and drainage), or (b) the project must comply with all conditions of the MN Wetland Conservation Act 8420.0420 Subp.4. Federal Approvals exemption (in which case notification to MnDOT is required) or the Subp.6. Utilities exemption (in which case either all permanent disturbance must total &lt;0.5 acre, or a Level 2 delineation must confirm that all permanent wetland impacts total &lt;0.5 acre).</p> <p><u>General comments:</u> Any ground disturbance (e.g., fill, excavation, direct or indirect drainage) of regulated aquatic resources must comply with all applicable federal Clean Water Act Section 404, Minnesota Wetland Conservation Act (WCA), and MDNR Public Waters Work requirements. Any required wetland delineations require approval by MnDOT OES, as the Local Government Unit (LGU) responsible for administering the WCA within state TH ROW.</p> <p>The project must restore any temporary impacts and avoid, minimize, and mitigate any permanent impacts to delineated aquatic resources to the extent required by state and federal law. This includes implementing Best Management Practices (BMPs) during construction to minimize aquatic resource disturbance, including compaction, erosion, and sedimentation.</p> <p>MnDOT reserves the right to conduct field inspections within its ROW.</p>
<p><b>Water Permits - Federal Agencies, Floodplains</b></p>	<p><b>*If floodplains are crossed by the project*</b> The Applicant should make efforts to avoid placement of structures or fill in floodplain areas in order to minimize adverse impacts and increased risk of flooding. The Applicant should engage with local floodplain permitting authorities to determine permitting and other requirements. The project may also involve work affecting waters of the US in which case a Section 404 authorization from the U.S. Army Corps of Engineers would be needed.</p>

<p><b>Cultural Resources</b></p>	<p>Review of applicable databases on February 2, 2024, and the letter from Merjent to SHPO dated August 8, 2023, titled "Great River Energy - Pilot Knob to Burnsville Project Archaeological Overview," (provided as part of the review packet) indicate there are no known or suspected archaeological sites or burials within MnDOT R/W along the proposed route. Further no listed National or State Register of Historic Places historic properties are within or adjacent to MnDOT R/W along the proposed route.</p> <p>The Applicant should provide summary of cultural field surveys and coordination with SHPO to date when submitting permit applications. If surveys have not been completed but are planned, provide an anticipated schedule for completion. If the Applicant is aware of or becomes aware of significant cultural resources findings in or adjacent to MnDOT ROW, please contact our office at <a href="mailto:CulturalResources.dot@state.mn.us">CulturalResources.dot@state.mn.us</a>. In addition, the Applicant shall prepare a Post Review Discovery Plan (PRDP) and submit to MnDOT for review and contact information for CRU staff to be included in the PRDP. This plan should outline the steps to be followed in the event of any discovery of archaeological materials, human remains, or burials, and include language specific to the coordination with MnDOT when a discovery is on MnDOT R/W. MnDOT Cultural Resources Unit (CRU) staff should be notified (<a href="mailto:CulturalResources.dot@state.mn.us">CulturalResources.dot@state.mn.us</a>) within 24 hours/days in the event of an discovery on MnDOT property during construction.</p> <p>Additional archaeological investigations (e.g., literature reviews, reconnaissance surveys [if warranted]) may be required, depending on the permit application areas received, where co-location is proposed or where temporary easement may be located within MnDOT ROW. Investigations should include in-field inspections to document areas of soil disturbance and to identify potentially unknown archaeological sites within areas of moderate to high archaeological potential. A PRDP should be developed for the project in advance of construction and provided to MnDOT CRU.</p>
<p><b>Environmental Assessment Unit / Environmental Review</b></p>	<p>If the Project will involve any construction activities within MnDOT ROW, the Applicant (and/or their Contractor) must comply with the following, relating to the conduct of work on the Project or to individuals engaged in work for the Project or employed on the Project:</p> <ul style="list-style-type: none"> <li>(1) All applicable State and Federal laws and regulations</li> <li>(2) Orders and decrees of bodies and tribunals with lawful jurisdiction over the work</li> <li>(3) Such local ordinances as are applicable to the work</li> </ul> <p>MnDOT's Environmental Assessment Unit reserves the right to request copies of the Applicant's environmental permits for work within its ROW as well as any inspection reports completed by the Applicant and/or its contractor.</p>

<b>Soil Erosion and Sediment Control / Stormwater</b>	<p>If the Project ultimately meets the established disturbance threshold, the Applicant will be required to obtain coverage under the Minnesota Pollution Control Agency's (MPCA) Construction Stormwater General Permit (MNR100001). If a portion of the final alignment is located within MnDOT ROW, we request that the Applicant submit a copy of its Construction Stormwater Pollution Prevention Plan (SWPPP)/erosion and sediment control details to MnDOT OES for review prior to filing its Notice of Intent for coverage under MPCA's MNR100001. In addition, MnDOT reserves the right to conduct inspections of the project for portions that are within MnDOT ROW during and/or after construction. The Applicant (and/or its contractor) will be the Owner on this permit for any work on MnDOT ROW - MnDOT will not be a co-Applicant.</p> <p>Soil compaction caused by equipment traffic and haul roads on MnDOT ROW must be mitigated using techniques described in the MnDOT Facility Design Guide Chapter 13 (<a href="https://roaddesign.dot.state.mn.us/facilitydesign.aspx">https://roaddesign.dot.state.mn.us/facilitydesign.aspx</a>).</p> <p>Temporary and permanent erosion and sediment control measures on MnDOT ROW must follow standards in the MnDOT Facility Design Guide Chapter 13 (<a href="https://roaddesign.dot.state.mn.us/facilitydesign.aspx">https://roaddesign.dot.state.mn.us/facilitydesign.aspx</a>).</p> <p>Seeding on MnDOT ROW must follow standards in MnDOT Seeding Manual (<a href="https://www.dot.state.mn.us/environment/erosion/vegetation.html">https://www.dot.state.mn.us/environment/erosion/vegetation.html</a>).</p> <p>Any erosion control blanket must be free of plastic netting and on the MnDOT Approved Products List for Rolled Erosion Prevention products. In addition, any hydraulic mulch used up-slope of Public Waters must be free of plastic fiber additives.</p>
<b>District Permitting Staff</b>	<p>Direct coordination with applicable District Permitting Staff will be required for all downstream MnDOT utility permits. MnDOT Permitting Policy and Guidance can be found at: <a href="http://www.dot.state.mn.us/utility/guidance.html">http://www.dot.state.mn.us/utility/guidance.html</a>. Make reference to the Project name and MPUC docket number on ALL MnDOT permit applications. Any work that affects MnDOT right of way will require a permit. All MnDOT utility permits are available and must be applied at: <a href="https://olpa.dot.state.mn.us/OLPA/">https://olpa.dot.state.mn.us/OLPA/</a>.</p>

<p><b>District Planning Staff</b></p>	<p><u>State Highway current construction projects:</u> Please note that MnDOT projects on state highways may affect travel routes to the project site, and/or may alter access points. To learn which projects might be in the area please review the current MnDOT construction projects website at <a href="https://www.dot.state.mn.us/construction/index.html">https://www.dot.state.mn.us/construction/index.html</a> and click on the district where your project is located.</p> <p><u>State Highway planned and future projects:</u> MnDOT plans projects along state highways up to 10 years in advance. Please check the area in which your project is located at <a href="https://www.dot.state.mn.us/roadwork/index.html#gsc.tab=0">https://www.dot.state.mn.us/roadwork/index.html#gsc.tab=0</a> to see which projects might coincide with your project. Note that project timing can change, particularly for projects that are identified as being planned for 5 to 10 years in the future. You may also reach out to the district Planning contact or district Project Manager for more information.</p> <p><u>Access:</u> Because there is a direct connection between crash rates and access density on state trunk highways, project proposers should plan to utilize access points on local roads whenever possible. Access from MnDOT right-of-way whether at an existing driveway or new driveway is not guaranteed, and new highway access permits will be required in either case. Please contact District Permitting staff for more information about permit applications, processes, and requirements.</p>
<p><b>Design Support / Safety and Operations Management</b></p>	<p><u>Powerlines:</u> Lateral placement of utility poles or non-crashworthy must be placed outside the roadway's clear zone and should avoid the need for traffic barrier shielding. Any side slope grading within the roadway clear zone must not result in a hazardous geometry for run-off vehicles. Place poles as far out of the clear zone as possible. Additional distance from the roadway is encouraged, for roadway and driver safety. Added poles must not be placed closer to the trunk highway than existing poles. Utility poles/devices must not obstruct intersection sight lines. Appurtenances protruding more than four inches above the ground line shall be located outside the clear zone and as close to the edge of the ROW as practical, and must not obstruct intersection sight lines. Appurtenances within the roadway clear zone must be crashworthy. See MnDOT's Facility Design Guide - Chapter 10 (<a href="https://roaddesign.dot.state.mn.us/facilitydesign.aspx">https://roaddesign.dot.state.mn.us/facilitydesign.aspx</a>) for a definition of "crashworthy" and other pertinent information.</p> <p><u>Access Roads:</u> Additional access points off the trunk highway are discouraged and should be avoided. For proposed access roads, the transverse slope design for permanent access roads connected to the trunk highway must be 1V:6H or flatter on the roadside and 1V:10 or flatter if in the median. See Transverse Slopes in the MnDOT's Facility Design Guide - Chapter 10.</p> <p>For other technical components and requirements for utility owners regarding the location, design, and methods for installing, adjusting, accommodating, and maintaining utility facilities on such rights of way, please refer to MnDOT Utility Accommodation and Coordination Manual, found here: <a href="https://www.dot.state.mn.us/utility/projectdelivery.html">https://www.dot.state.mn.us/utility/projectdelivery.html</a>.</p> <p>To understand why these rules and comments exist, intersection related and roadway departure crashes are two of the leading types of fatal and serious injury crashes on Minnesota Roadways. These comments reflect measures needed to continue to prevent these types of crashes. To find out more about Minnesota safety efforts, please see our Strategic Highway Safety Plan. <a href="https://www.dot.state.mn.us/trafficeng/safety/shsp/">https://www.dot.state.mn.us/trafficeng/safety/shsp/</a></p>

<b>Metro Multi-Modal</b>	<p>There are existing or planned active transportation facilities along all parts of the proposed utility path. MnDOT expects the developer to retain the existing and planned Pedestrian Access Routes, the accessible, continuous, and unobstructed portion of a walkway e.g., sidewalks, sidepaths, etc. The developer should place utility poles in a frontage or buffer that should extend at least 1 foot beyond the edge of the object to allow for pedestrian shy distance from these objects. During construction, the developer will need to provide a temporary pedestrian access route. The developer should consider winter maintenance and assume that snow will be removed from sidepaths and streets and moved into the buffer and may want to allow an additional 1 foot of clear distance between the utility poles and the edge of the pathway. Finally, because children are normally smaller than adults, motorists may have difficulty seeing them at street crossings. Utility poles should not inhibit a driver's ability to see children. MnDOT expects the developer to review sight lines at all intersections within school zones.</p>
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