

Table 1 DOC-EERA US Highway 14 Route Alternative Summary
MnDOT ENM Request for US Hwy 14 Route Alternative
November 21, 2024

ENM ID No.	ENM-Hwy 14		
Lat/Long	44.204257 \ -93.78817		
MnDOT Trunk Highway Name	US Hwy 14		
Collocated (Yes/No)	Yes		
Collocation Length (feet)	Minnesota DME - Waseca (9.67 miles total) DME- Tracy (10.05 miles total) variance of the route distance from the road, these totals include more than one segment of collocation		
Scenic Byway's	Minnesota River Valley Scenic Byway		
Memorial Route	No		
Minnesota DNR Native Plant Communities	Claremont 26- UPs23a Mesic Prairie (Southern) S2 Claremont 30- UPs23a Mesic Prairie (Southern) S2 Hwy 14 ROW- UPs23a Mesic Prairie (Southern) S2 Janesville-Waseca- ROW UPs23a Mesic Prairie (Southern) S2 Janesville-Waseca- ROW WPs54b Wet Prairie (Southern) S2 Janesville 36- MHs38 Southern Mesic Oak-Basswood Forest (S3) Kaplan Woods- FFs68 Southern Floodplain Forest (S3) Kaplan Woods- MHs39a Sugar Maple - Basswood - (Bitternut Hickory) Forest S2 Kaplan Woods- MHs49 Southern Wet-Mesic Hardwood Forest (S2, S3) Mantorville 31- UPs23a Mesic Prairie (Southern) S2 Wasioja 32- FFs59a Silver Maple - Green Ash - Cottonwood Terrace Forest S3 Wasioja 32- MHs49 Southern Wet-Mesic Hardwood Forest (S2, S3)		
*Native Plant Communities	FFs59a – Silver Maple – Green Ash- Cottonwood Terrace Forest (2) FFs68 – Southern Floodplain Forest (2) MHs39a- Sugar Maple – Basswood - (Bitternut Hickory) Forest (2) MHs49- Southern Wet-Mesic Hardwood Forest (12) UPs23a- Mesic Prairie (Southern) (3) WPs54b- Wet Prairie (Southern)		
Conservation Opportunity Areas	Lower Minnesota River Valley, Wild Indigo – Cedar River, Rice Lake		
Game Refuges	Claremont		
Minnesota Biological Survey (MBS) Railroad Rights-of-Way Prairies	7 sites (Dakota Minnesota and Eastern Railroad - Waseca, Dodge, & Steele) & (Canadian Pacific Railway - Steele)		
MBS Site of Biodiversity Significance	Ashland 6, Claremont 25, Claremont 26-27, Claremont 26, Claremont 30, Hwy 14 ROW, Hwy 218 ROW, Janesville - Waseca ROW, Janesville 29, Janesville 36 Kaplan Woods, matorville 31, Meriden 19, RADIO TOWER WOODS, Wasioja 32, Woodville 23		
Important Bird Areas	Upper Minnesota River Valley IBA (within 1 mile buffer)		
USFWS Regulatory Species	Rusty Patched Bumble Bee (High potential Zone)		

Calcareous Fen	Kasota 7, Lime 30, Pheasants Forever WMA, Wasioja WMA (Within 5 mile buffer)
Impaired Waters	Straight River
Lakes of Biological Significance	Eagle Lake
Recreational Resources	Snowmobile Trails: Dodge County Trails, Kasson-Mantorville Trails, Waseca County Trails, Steele County Trails. Water trails: Straight River
Environmental Justice Areas Over 35% of people below 200% poverty Level	Between RP 130-137 Between RP 160-161 Between RP 173- 176
Contaminated Material/ Storage Tanks	WINMN Sites: Above ground Tanks, Construction Stormwater, Feedlots, Hazardous Waste, Multiple Activities, Petroleum Remediation Leak Site, and Underground Tanks. What's In my Neighborhood Sites: Feedlots, Hazardous Waste (Tanks, Stormwater, Investigation sites), Stormwater, and (2) Tanks
Wellhead Protection Areas	Kasson 4, Owatonna, and Claremont
Floodplain	Multiple Areas that cross 100 year floodplain including areas near Eagle Lake, area west side of Janesville, small area south of Goose Lake, Straight River, Dodge Center Creek, Masten Creek, and Cascade Creek
Watercourses	Mayhew Creek, Masten Creek, Cascade Creek, Straight River, an Unnamed Stream, and Dodge Center Creek
Cultural Resources	NA
Historic Roadside Properties	NA
Railroad Crossing	Minnesota (DME) Subdivisions: Waseca, Tracy, and Hartland, Minnesota (ICE)- Owatonna, and Twin Cities (UP) Subdivisions: Mankato, Albert Lea, No. Mankato Yard, and Chestnut St- St James.
Airport Influence Areas/Runways	Airports: Eagles Nest Aerodrome (appx 2.4 miles South), Galler's (appx 4.1 miles Northeast), Dodge Center (appx 0.75 miles South/Southeast), Allina Hospital & Clinic Owatonna (appx. 3.75 miles South), Owatonna Degner Regional (appx. 4.4 miles South), Immanuel – St Joseph's Hospital (Appx. 1.6 miles Southwest), Mankato Regional (appx. 3.3 miles South), and Waseca Municiple (appx. 0.6 miles East/Northeast). Four Airport Influence Areas including: Dodge Center Municipal Airport (appx. 0 miles), Mankato Regional Airport- Sohler Field (appx. 1.1 miles), Owatonna Degner Regional Airport (appx. 2.2 miles), and Waseca Municipal Airport (appx. 0 miles). Seven Airport Runways were identified: 2 with the Mankato Airport, 2 with Dodge Center Municipal Airport, 1 Waseca Municipal Airport, and 2 with the Owatonna Denger Regional Airport.
RIM Conservation Easments	5 RIM Conservation Eaments are intersected : 2 in Blue Earth County, 2 in Waseca County, and one Dodge County
HHHIS Rare Features	North American Racer, Little Brown Myotis, Tricolored Bat, Mucket, Spike, Creek Heelsplitter, Black Sandshell, Round Pigtoe, Ellipse, Green Dragon, Tuberous Indian Planitain, Plains Wild Indigo, Davis' Sedge, Small White Lady's-slipper, Rattlesnake Master, Tubercled Rein Orchid, Edible Valerian

March 10, 2025

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

Re: In the Matter of the Application of Xcel Energy Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project Route Alternatives in Southeast Minnesota
PUC Docket Number: E002/CN-22-532, E002/TL-23-157

Mr. Davis,

On November 26th, 2024, the Minnesota Department of Commerce (DOC) issued its Environmental Impact Statement (EIS) Scoping Decision on Xcel Energy's (Applicant) route permit application (RPA) for the Mankato – Mississippi River 345kV Transmission Line Project (Project). The EIS scoping decision included several route alternative modifications that intersect with the state trunk highway system that were not previously included in the RPA. The Minnesota Department of Transportation (MnDOT) has reviewed the information available on the additional routes alternatives and submits the following comments for Draft EIS consideration.

Following the announcement of the official scoping decision, the Applicant participated in MnDOT's Utility Early Notification Memo (ENM) process for review of all proposed route alternative modifications that affect MnDOT interests and right-of-way (ROW). *Attachments 1, 2 and 3* detail MnDOT's current understanding of possible impacts, suggested mitigative measures, potential permit limitations/requirements, and other relevant information regarding the reviewed routes.

Route Segment 17 (Highway 14 Option)

MnDOT appreciates the route width variance considerations of the Applicant and Energy Environmental Review and Analysis (EERA) staff to allow for routing flexibility with this option. However, these considerations may need to be extended past the seven locations as determined by the Applicant to include areas of concern found by MnDOT during the ENM review process. Current route flexibility considerations may include:

- planned but currently unfunded trunk highway improvements
- pending study completions
- planned trunk highway turn backs (maps included in *Attachment 3*)
- existing drainage infrastructure
- existing public and MnDOT utility conflicts
- control of access¹ along most of the planned colocation areas of US 14
- specific areas of safety concern as determined by MnDOT Operations, Traffic, and Maintenance staff

¹ Control of Access - The condition where the right of owners or occupants abutting land or other persons to access, light, air, or view in connection with a highway is fully or partially controlled by public authority. (See MN Statutes [§ 160.08](#) and [§ 169.305](#))

Further, if the Minnesota Public Utilities Commission (Commission) selects the extensive colocation option of Route Segment 17, recent changes to Minnesota law require the Applicant submit a Constructability report to MnDOT. Beyond being a legal requirement, the report is essential for MnDOT to assess and mitigate potential impacts on public safety that the route segment may have during construction and after construction.

Minn. Stat. [§ 161.45.6](#) reads as follows:

Subd. 6. High voltage transmission; constructability report; advance notice.

(a) If the commissioner and a utility or transmission line developer identify a permissible route along a trunk highway corridor for possible colocation of transmission lines, a constructability report must be prepared by the utility or transmission line developer in consultation with the commissioner. A constructability report developed under this subdivision must be used by both parties to plan and approve colocation projects.

(b) A constructability report developed under this section between the commissioner and the parties seeking colocation must include terms and conditions for building the colocation project. Notwithstanding the requirements in subdivision 1, the report must be approved by the commissioner and the party or parties seeking colocation prior to the commissioner approving and issuing a permit for use of the trunk highway right-of-way.

(c) A constructability report must include an agreed upon time frame for which there may not be a request from the commissioner for relocation of the transmission line. If the commissioner determines that relocation of a transmission line in the trunk highway right-of-way is necessary, the commissioner, as much as practicable, must give a four-year advance notice.

Although the statute does not specify when the Applicant must submit a report to MnDOT or how it should be incorporated into the Commission's record (e.g., required compliance filing, permit condition, or downstream permit inclusion), MnDOT considers the Applicant's legal obligation to complete and submit a Constructability Report, with sufficient time for MnDOT to review, a necessary prerequisite under the statute to confirm Route Segment 17 is permissible before the Commission's final decision.

General MnDOT Permitting Comments

Alignments paralleling within or otherwise encroaching on trunk highway ROW will need further review as utility permit approvals cannot be assured without certain specifics not yet provided. Alignments crossing trunk highways should be perpendicular with poles located outside MnDOT ROW to the maximum extent practical and feasible. Exceptions to these crossing preferences will need to be coordinated prior to MnDOT utility permit application submittals.

Aside from recent legislative changes allowing certain high-voltage transmission lines permitted via Minn. Stat. [§ 216L](#) to longitudinally occupy portions of TH ROW not previously allowed by Policy, there are several standing Policies, Manuals and other MnDOT documentation that offer guidelines and limitations to such placements based on safety and the proper function of the highway. Please see [Policy and Guidance - Utility Agreements & Permits - MnDOT](#).

Should any of the route alternatives continue to move forward for Commission route permit consideration, continued coordination with MnDOT staff is necessary. Any MnDOT permits required as a part of this Project can be coordinated at an earlier time but may not be issued until the Commission has approved all necessary permits for this project. All applicable [permitting](#), [traffic control](#) and construction coordination efforts should be made through the appropriate MnDOT [district staff](#).



Office of Land Management

395 John Ireland Blvd MS 678

St. Paul, MN 55155

MnDOT has a continuing interest in working with all parties to ensure that possible impacts to the entire state trunk highway system, safety of the traveling public and MnDOT maintenance personnel, and environmentally significant areas of concern are adequately addressed.

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

Attachments:

Attachment 1_MnDOT Summary of OES and FG Comments and Recommendations_Xcel_MMRT_DEIS_3-10-25
Attachment 2_MnDOT Summary of OES and FG Comments and Recommendations_Xcel_MMRT_DEIS_3-10-25
Attachment 3_MnDOT D7 County Turnbacks

ec: MnDOT Utility ENM Review Staff

Equal Opportunity Employer

ATTACHMENT 1

XCEL ENERGY: MANKATO - MISSISSIPPI RIVER TRANSMISSION PROJECT (MMRT) CN-22-532 and TL-23-157

ALTERNATE ROUTE US 14 REVIEW

MNDOT OES & FUNCTIONAL GROUP COMMENTS

Resource	US 14 Comments
Federal and State-listed Protected Species	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.
Federal and State-listed Protected Species	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 (OES). Restrict all activities to avoid the application of insecticides and fungicides on MnDOT ROW.
Federal and State-listed Protected Species	<p>*If project is within or near (one half mile) a High Potential Zone for Rusty Patch Bumble Bee*</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 (https://www.fws.gov/species/rusty-patched-bumble-bee-bombus-affinis/map) 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 protectedspecies.dot@state.mn.us immediately if the project is now within the boundaries identified by USFWS.</p>
Federal and State-listed Protected Species	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 described in the MnDOT Seeding Manual (see http://www.dot.state.mn.us/environment/erosion/vegetation.html).
Avian Protection	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>Contaminated Materials Management</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 Right-of-Way (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 https://www.dot.state.mn.us/utility/forms.html).</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>Sites of concern adjacent to the TH 14 route are identified by county, as follows:</p> <ul style="list-style-type: none"> • Blue Earth County: Numerous leak sites, petroleum remediation sites, underground storage tanks, hazardous waste generators, dump sites (Eagle Lake) and Minnesota Department of Agriculture (MDA) incident sites are located within 500-feet of TH 14 ROW. • Waseca County: Numerous MDA sites and leak sites identified at Crystal Valley Coop. Other listings include underground storage tanks and a leak site at the Southern MN Asphalt Plant. • Steele County: Multiple MDA sites and leak sites identified near Owatonna. There are documented karst springs near TH 14 and I-35, which may be found at https://www.dnr.state.mn.us/waters/groundwater_section/mapping/springs.html. • Dodge County: Near Claremont, there are unnamed dump sites, a hazardous waste generator, and underground storage tanks. There are multiple leak sites near Kasson and multiple MDA sites identified near Byron, MN.
<p>Regulated Waste and Storage Tanks</p>	<p>It is the responsibility of the Applicant to report the presence of aboveground storage tanks (ASTs) within project limits. If ASTs are identified, contact MnDOT's Regulated Materials staff. Asbestos, solid waste, regulated and/or hazardous waste encountered during construction activities are required to be managed in accordance with applicable federal/state and local regulations and/or guidance documents.</p>
<p>Roadside Vegetation Management</p>	<p>T&E species are present along this section of TH14; to avoid impacts all utility installations should be placed on the south side of TH14. There is high quality native remnant prairie adjacent to the rail line on MnDOT ROW, and staging/operating equipment in these areas should be avoided.</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 to the road surfaces. Failure to adhere to these recommendations may lead to unnecessary damage and compaction of native plants and soils.</p> <p>MnDOT invested in native seed mix during the reconstruction of TH14 and prescribed fire is the primary means of vegetation management throughout this corridor. Any utilities installed in this area must be compatible with fire being used in the vicinity as a means of vegetation management.</p> <p>Restoration: If areas are disturbed on MnDOT’s ROW, the area must be re-established MnDOT Seed Mix: Patch Mix at a rate of 30 lbs per acre. Patch Mix components and rates can be found in the Guide to the New 2024 MnDOT Seed Mixes (https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/download?docId=38590641) . 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> <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 must be limited to spot treatments via hand tools only [i.e., no equipment mounted broadcast applications]). Other general conditions include the following:</p> <ul style="list-style-type: none"> • Herbicide used on MnDOT ROW must be labeled for use on rights-of-way. • Pesticide applicators must be MN state- licensed as a Commercial Pesticide Applicator in Categories A and J (see: https://www.mda.state.mn.us/pesticide-fertilizer/pesticide-applicator-license-types)

	<ul style="list-style-type: none"> • Herbicide records for work on MnDOT’s ROW must be provided to the local MnDOT District Office • Refer to Resource: Federally and State Listed Protected Species for further pesticide information. The more restrictive statements must be followed. <p>Noxious/Invasive Weeds: Wild parsnip, poison hemlock, and Canada thistle (Prohibited – Control noxious weeds) are present along this section of TH14. 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 (https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list) are identified within installation limits on MnDOT’s ROW, the Applicant must submit its Invasive Species Prevention Plan to the OES-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 is necessary, a transportation permit will be required. Questions regarding noxious weed law or noxious weed transportation permits should be directed to the Minnesota Department of Agriculture at noxiousweeds.mda@state.mn.us.</p> <p>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. (https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/download?docId=38590641) . 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> <p>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>
Wetlands Coordination	<p>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. If ground-disturbing activities are proposed within MnDOT ROW, MnDOT may require an aquatic resource delineation to be performed throughout the areas of proposed disturbance. The delineation would 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>
Water Permits - Federal Agencies, Floodplains	<p>The project appears to cross several FEMA mapped floodplains. 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>

Cultural Resources	<p>12/8/2023 CRU Comment</p> <p>Known or suspected archaeological sites, burials/cemeteries, and historic properties within MnDOT R/W: Segment 1: Sec. 26 and 35 – T109N-R23W – Sakatah Cemetery; Sec. 33 – T109N – R23W & Sec. 3 – T108N-R23W – County Line Cemetery; Sec 35 – T109 – R25W – Calvary Cemetery; Sec. 36 – T109N – R24W – Alpha Site 21WEg (Okaman)</p> <p>Segment 2: Sec. 34 – T110N – R18W – St. Michaels Cemetery; Sec. 34 – T110N – R18W – Old Hauge Cemetery; Sec. 5 - T109N – R17W – Unknown Cemetery; Sec. 34 – T110N – R17W – Dale Cemetery; Sec. 33 – T110N – R17W – Alpha Site21DGw (Spring Creek); Sec. 26 – T110N – R17W Alpha Site 21GDae (Old Wanamingo)</p> <p>Segment 3: Sec. 19, 20, 29, 30 – T109N – R15W – Catholic Cemetery</p> <p>Segment 4: Sec. 19, 20, 29, 30, 33, 34 – T109N – R15W – Catholic Cemetery; Sec. 34 – T109N – R15W – Site 21GD0249 (O’Brien); Sec. 7 – T108N – R14W – Site 21OL0030 (Shady Lake); Sec. 7, 18 – T108N – R14W – Site 21OL0029 (Davis); Sec. 18 – T108N – R14W – Site 21OL0032 (South Branch); Sec. 18 – T108N – R14W – Standing Structure OL-ORT-013 (William Rucker Farmstead).</p> <p>The Applicant should provide summary of cultural field surveys and coordination with SHPO to date. If surveys have not been completed, 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 R/W, please contact our office at CulturalResources.dot@state.mn.us In addition, the Applicant shall prepare a Post Review Discovery Plan (PRDP1) and submit to MnDOT for review and contact information for CRU staff must be included in the PRDP. This plan should outline the steps to be followed in the event of an unanticipated discovery of archaeological materials, human remains, or burials, and include language specific to the coordination with MnDOT when a discovery is on MnDOT ROW. MnDOT Cultural Resources Unit (CRU) staff should be notified (CulturalResources.dot@state.mn.us) within 24 hours/days in the event of an unanticipated find on or adjacent to MnDOT property during construction.</p> <p>Additional archaeological investigations (e.g., literature reviews, reconnaissance surveys [if warranted]) may be required where co-location is proposed or where temporary easement may be located within MnDOT R/W. 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. Archaeological site evaluations may be required for sites that cannot be avoided by the project. A PRDP should be developed for the project in advance of construction and provided to MnDOT CRU.</p> <p>12/30/2024 CRU Comment</p> <p>Please note MnDOT CRU has only reviewed the portions of the routes within MnDOT R/W. MnDOT CRU Comments regarding TH 14 alternative added as part of scoping EIS phase and not previously commented on as it occurs within MnDOT R/W in relation to currently recorded National Register eligible properties and/or previously recorded archaeological sites are included below:</p> <ul style="list-style-type: none">• Trunk Highway/U.S. Highway 14 (formerly Trunk Highway 7), historic inventory number XX-ROD-00016, was previously determined not eligible for listing in the National Register.• Tunk Highway 6, historic inventory number XX-ROD-00042, which runs concurrent with TH 14 for a portion of the route in Blue Earth County, was previously determined not eligible for listing in the National Register. <p>Previously recorded archaeological sites and/or alpha sites (site leads, unverified) are intersected or adjacent to MnDOT R/W, as listed below. Additional investigations maybe warranted to determine the impact of the project on these resources.</p> <ul style="list-style-type: none">• 21BE0022 (T108, R26W, Sec. 12)• 21BE0138 (T108, R25W, Sec. 7)• 21BE0139 (T108, R25W, Sec. 7)• 21BE0066 (T108, R25W, Sec. 24)• 21WE0060 (T108, R24W, Sec. 30)• 21WE0061 (T108, R24W, Sec. 29, 30)• 21WE0059 (T108, R24W, Sec. 30)• 21WE0025 (T108, R24W. Sec. 32, 33)• 21WE0066 (T108, R24W, Sec. 33)• 21WEh (T108, R24W, Sec. 36)• 21WE0007 (T107, R23W, Sec. 4)• 21WE0079 (T107, R23W, Sec. 23)• 21WE0077 (T107, R22W, Sec. 20)• 21WE0029 (T107, R22W, Sec. 21)
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	<ul style="list-style-type: none">• 21WE0031 (T107, R22W, Sec. 21)• 21WE0030 (T107, R22W, Sec. 21)• 21ST0023 (T107, R19W, Sec. 25)• 21ST0021 (T107, R19W, Sec. 25)• 21ST0019 (T107, R19W, Sec. 25)• 21ST0020 (T107, R19W, Sec. 25)• 21ST0022 (T107, R19W, Sec. 25)• 21DOn (T107, R17W, Sec. 32)• 21DO0004 (T107, R17W, Sec. 32)• 21DOx (T107, R16W, Sec. 33) <p>The Applicant should provide summary of cultural field surveys and coordination with SHPO to date. If surveys have not been completed, 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 R/W, please contact our office at CulturalResources.dot@state.mn.us. In addition, the Applicant shall prepare a Post Review Discovery Plan (PRDP) and submit to MnDOT for review and contact information for CRU staff must be included in the PRDP. This plan should outline the steps to be followed in the event of an unanticipated discovery of archaeological materials, human remains, or burials, and include language specific to the coordination with MnDOT when a discovery is on MnDOT ROW. MnDOT Cultural Resources Unit (CRU) staff should be notified (CulturalResources.dot@state.mn.us) within 24 hours/days in the event of an unanticipated find on or adjacent to MnDOT property during construction.</p> <p>Additional archaeological investigations (e.g., literature reviews, reconnaissance surveys [if warranted]) may be required where co-location is proposed or where temporary easement may be located within MnDOT R/W. 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. Archaeological site evaluations may be required for sites that cannot be avoided by the project. A PRDP should be developed for the project in advance of construction and provided to MnDOT CRU</p>
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FHWA National Scenic Byway Program	<p>This project will affect two Minnesota Scenic Byways Minnesota River Valley National Scenic Byway and Great River Road All-American Road. An additional recreational resource affected includes Mississippi River Trail (MRT)/USBR 45 and Straight River Water Trail.</p> <p>Under Title 23, USC, Section 162, National Scenic Byways Program; Scenic byways are designated as State, National or All-American because they possess one or more of six intrinsic qualities: scenic, cultural, recreational, natural, historic and archaeological qualities. An analysis of the physical and visual impact on each of these six intrinsic qualities should be conducted at each proposed crossing locations and/or collocated segments and where the proposed utility is within 7 miles of a byway to determine the route with the least adverse impact on the byway routes and corridors. At a minimum, this analysis should include:</p> <ul style="list-style-type: none"> • Streetview Imagery or on-the-ground photographs • Photo / Visual Simulations (existing conditions and post-construction). During early planning phases of project, this may consist of typical drawings/photos of similar projects that have already been constructed. Later in Project design, this should include site-specific assessments depicting photo and visual simulations for users of the byway. <p>Each scenic byway has a leaders' group and/or stakeholder group; these groups should be contacted as part of the environmental review process. Scenic easements and areas should be investigated to identify any prohibitions or limitations that apply to land uses in the vicinity of the scenic byway. Relevant state and federal regulations governing scenic byways can be found in the MnDOT Utility Accommodation on Highway Right of Way Policy and Coordination Manual (both of which can be accessed here: https://www.dot.state.mn.us/policy/operations/oe002.html), 23 U.S.C. s. 162, and 23 CFR s. 645.209 (h).</p> <p>The Minnesota Mississippi River Parkway Commission (MRPC), established by Minnesota Statutes, section 161.1419, is the governing body for the Great River Road (GRR) in Minnesota. Minnesota Statutes, section 161.142 requires the commissioner of Transportation to construct and improve the GRR and assist the MRPC in carrying out its functions and duties. Due to the location of the Project with respect to the GRR, we recommend the Project proponent consult directly with the MPRC if they have not already done so. Please contact MPRC for the GRR and the MRT... Chris Miller at chris@togpartners.com or info@mnmississippiriver.com, and the Minnesota River Valley National Scenic Byway Coordinator at Kristi.Fernholz@umvrhc.org, and keep MnDOT scenic byways staff apprised of these discussions.</p> <p>Applicant to develop mitigation measures for unavoidable impacts on intrinsic qualities within the scenic byway corridors. These include 4 Calcareous Fens, 16 MBS Sites of Biodiversity, 12 DNR Native Plant Communities, an Important Bird Area (Upper Minnesota River Valley IBA), a Lake of Biological Significance (Eagle), and a High Potential Zone for the Rusty Patch Bumble Bee. There were also several features listed in the NHIS Rare Features including 3 Vertebrate Animal Species, 8 Invertebrate Animals, and 49 Vascular Plant species identified by the MnDNR River Valley IBA), a Lake of Biological Significance (Eagle), and a High Potential Zone for the Rusty Patch Bumble Bee. There were also a number of features listed in the NHIS Rare Features including 3 Vertebrate Animal Species, 8 Invertebrate Animals, and 49 Vascular Plant species identified by MnDNR.</p>
Environmental Assessment Unit / Environmental Review	<p>If the U.S. 14 route is selected and the alignment falls within MnDOT ROW, close coordination with MnDOT's Office of Land Management and District staff will be required as well as a Utility Accommodation permit for the placement of utility lines across or under MnDOT highways.</p> <p>In addition, 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> <ol style="list-style-type: none"> (1) All applicable State and Federal laws and regulations (2) Orders and decrees of bodies and tribunals with lawful jurisdiction over the work (3) Such local ordinances as are applicable to the work <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>

<p>Soil Erosion and Sediment Control / Stormwater</p>	<p>Given the size of the Project, we assume 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx).</p> <p>Temporary and permanent erosion and sediment control measures on MnDOT ROW must follow standards in the MnDOT Facility Design Guide Chapter 13 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx).</p> <p>Seeding on MnDOT ROW must follow standards in MnDOT Seeding Manual (https://www.dot.state.mn.us/environment/erosion/vegetation.html).</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>
<p>Env Modelling and Testing (Noise)</p>	<p>The Applicant needs to take all precautions to avoid impacts to existing noise mitigation devices (e.g., noise walls) and/or applications within MnDOT's ROW. If the Project has the potential to impact noise mitigation infrastructure, please notify MnDOT's Environmental Modelling and Testing Unit group for further guidance.</p>
<p>District Permitting Staff</p>	<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: http://www.dot.state.mn.us/utility/guidance.html. Alignments paralleling within or otherwise encroaching on trunk highway ROW will need further review as utility permit approvals cannot be assured without certain specifics not yet provided. Alignments crossing trunk highways should be perpendicular with poles located outside MnDOT ROW whenever possible. Exceptions to these crossing preferences will need to be coordinated prior to MnDOT utility permit application submittals.</p>

District 7 Planning Staff	<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 https://www.dot.state.mn.us/construction/index.html 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 district in which your project is located (District 7 and District 6) at https://www.dot.state.mn.us/planning/10yearplan/district-chip.html 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 control exists along US 14; therefore, it is unlikely that permits would be granted for new access locations. In locations where there are openings in the access control for existing accesses, the use of such accesses will require a new highway access permit for change of use. Please contact District Permitting staff for more information about permit applications, processes, and requirements.</p> <p><u>D7 Right-of-way:</u></p> <ol style="list-style-type: none">1. District 7 has identified state ROW parcels along US 14 in Blue Earth and Waseca Counties that are planned for turn back to other road authorities. Attachment 3 shows images of these locations. It is unknown when the parcels will be turned back, what the effect would be on our turnback ability, or what the change in road authority would mean for operations, access, and maintenance of the poles.2. There is not enough detail (i.e. pole siting, etc.) to make specific comments on most areas of the routes; however, on TH 60 from Madison Lake to Elysian, there is very limited ROW between the highway and state trail for poles that are larger than the existing poles. <p><u>D7 Traffic:</u></p> <ol style="list-style-type: none">1. MnDOT District 7 is currently studying US 14 between Co Rd 12 and TH 60 in the Eagle Lake area for potential intersection control changes. All intersection types, including grade separation (e.g.: interchanges & overpasses), are being explored. We anticipate study completion in late summer of 2025.2. Although not in our current 10-year plan, there is potential for a future interchange at US 14 & TH 60.3. Crossings of the transmission line over US 14 should be limited. Any work over US 14 would require rolling lane closures with MN State Patrol.4. To the extent possible, MnDOT will prohibit any additional accesses on US 14 for maintenance of new poles. The highway includes access control throughout nearly all the corridor in District 7, which typically precludes establishment of new accesses.5. No objects shall be installed within the clear zone, which extends approximately 31 feet from the fog line on each side of the highway. <p><u>D7 Hydraulics:</u></p> <ol style="list-style-type: none">1. The existing drainage infrastructure (culverts, pipes, aprons, structures, ponds) have been located to efficiently convey drainage off our roads and through and off our ROW. As such, we do not want the transmission line infrastructure installed in any location that currently has drainage infrastructure.2. MnDOT needs to be able maintain our existing drainage infrastructure. This includes the ability to dig around our existing infrastructure. All transmission line infrastructure must be installed with enough clearance to allow MnDOT to be able to freely dig a minimum of 25 feet around all MnDOT’s existing drainage infrastructure.3. Installation of transmission poles within our roadside ditches can cause drainage issues. Any transmission line infrastructure that is installed within MnDOT drainage ditches will need hydrologic and hydraulic modeling to demonstrate that they do not cause a drainage issue either within or off MnDOT ROW because of their installation.
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District 6 Planning Staff	<p><u>Land Surveyor Principal • Surveys:</u> Aside from recent legislation regarding the allowance of Commission-permitted HVTL/Gen-Tie routes to longitudinally occupy portions of TH ROW not previously allowed by Policy, MnDOT’s Utility Accommodation & Coordination Manual https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/download?docId=1401425 offers guidelines and limitations to such placements based on safety and the proper function of the highway.</p> <p><u>Engineer • Project Development:</u> Push alignment 200 feet south of existing bridge when crossing 72nd to avoid conflict with a future roundabout. MnDOT recommends staying south of the existing concrete splitter island.</p> <p><u>Engineering Specialist • Permits Advertising Rochester:</u> MnDOT requests offsets for the required working space needed to avoid a transmission line shutdown to replace MnDOT lighting. MnDOT wants to be able to replace lighting without interfering with proposed alignment. More detailed drawings would be needed to determine distance in areas of concern. Southern alignment presents less challenges. Not allowed through interchange or over bridge. MnDOT will not allow the transmission lines to run through ramp areas as proposed in the straight-line alternative. Transmission line alignments will be required to go out an around the entire interchange. While current MnDOT Transmission Line Guidelines state a minimum 50-foot setback from bridges, D6 may request a 100-foot setback from bridges.</p> <p><u>Engineer • Project Management:</u> This detailed Final Route map does not match the last exhibit showing the overview map. Confusion around final alternative we are to review. This will impact future interchange options for providing access to western reaches of Byron. This Final Route overview map does not match the first exhibit showing the detailed map. Confusion around final alternative we are to review.</p> <p><u>Engineer • Materials:</u> New Roundabout being constructed here at 18th Ave & TH 14. Also, rename as TH 63.</p>
Design Support / Safety and Operations Management	<p><u>Powerlines:</u> Lateral placement of utility poles or non-crashworthy appurtenances 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) for a definition of "crashworthy" and other pertinent information.</p> <p><u>Pipelines:</u> Lateral placement of non-crashworthy appurtenances 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's clear zone must not result in a hazardous geometry for run-off vehicles. 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) for a definition of "crashworthy" and other pertinent information.</p> <p><u>Access Roads:</u> Additional access points off of 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: https://www.dot.state.mn.us/utility/projectdelivery.html.</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. https://www.dot.state.mn.us/trafficeng/safety/shsp/</p>

Blowing Snow Control / Snow Fences	<p>Snow fences have been established in strategic locations across that state as a collaborative effort with landowners to trap snow from blowing across and accumulating on state highways. Based on our review, we have identified living and/or structural snow fences in the vicinity of your project.</p> <p>Snow trap data:</p> <ul style="list-style-type: none">- 18 total snow trap s on the route<ul style="list-style-type: none">9 high severity snow traps = 12.74 miles9 medium severity snow traps = 5.82 miles= 18.56 total miles snow trap miles <p>Snow fence data:</p> <ul style="list-style-type: none">- 54 total snow fences on the route= 7.65 total snow fence miles <p>Additional details around this data are available upon request. Please allow adequate time for the Team to produce the information.</p> <p>If the utility project adversely impacts a snow fence causing the loss of blowing snow control functionality, the utility will must work with MnDOT to find a blowing snow control solution. Please refer to http://www.dot.state.mn.us/environment/livingsnowfence/ and Chapter 15D - Design for Blowing Snow Control found in MnDOT Facility Design Guide (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) for more information.</p>
Railroad	<p>Railroads are private entities that conduct their own permitting process for utility impacts. MnDOT does not have jurisdiction in these areas. It is recommended that project coordination occurs directly with the affected railroad. Minnesota Rail Viewer Application (MnRail)</p>

ATTACHMENT 1

XCEL ENERGY: MANKATO - MISSISSIPPI RIVER TRANSMISSION PROJECT (MMRT) CN-22-532 and TL-23-157

ADDITIONAL ALTERNATE ROUTES REVIEW

MNDOT OES & FUNCTIONAL GROUP COMMENTS

Resource	All Other (Non-Route Segment 17) Alternate Routes Comments
Federal and State-listed Protected Species	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.
Federal and State-listed Protected Species	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 (OES). Restrict all activities to avoid the application of insecticides and fungicides on MnDOT ROW.
Federal and State-listed Protected Species	<p>*If project is within or near (one half mile) a High Potential Zone for Rusty Patch Bumble Bee*</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 (https://www.fws.gov/species/rusty-patched-bumble-bee-bombus-affinis/map) 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 protectedspecies.dot@state.mn.us immediately if the project is now within the boundaries identified by USFWS.</p>
Federal and State-listed Protected Species	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 described in the MnDOT Seeding Manual (see http://www.dot.state.mn.us/environment/erosion/vegetation.html).
Avian Protection	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.
Contaminated Materials Management	<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 https://www.dot.state.mn.us/utility/forms.html).</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>
Regulated Waste and Storage Tanks	It is the responsibility of the Applicant to report the presence of aboveground storage tanks (ASTs) within project limits. If ASTs are identified, contact MnDOT's Regulated Materials staff. Asbestos, solid waste, regulated and/or hazardous waste encountered during construction activities are required to be managed in accordance with applicable federal/state and local regulations and/or guidance documents.

Roadside Vegetation Management	<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 must be limited to spot treatments via hand tools only [i.e., no equipment mounted broadcast applications]). Other general conditions include the following:</p> <ul style="list-style-type: none">• Herbicide used on MnDOT ROW must be labeled for use on rights-of-way.• Pesticide applicators must be MN state- licensed as a Commercial Pesticide Applicator in Categories A and J (see: https://www.mda.state.mn.us/pesticide-fertilizer/pesticide-applicator-license-types)• Herbicide records for work on MnDOT’s ROW must be provided to the local MnDOT District Office• Refer to Resource: Federally and State Listed Protected Species for further pesticide information. The more restrictive statements must be followed. <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 (https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list) are identified within installation limits on MnDOT’s ROW, the Applicant must submit its Invasive Species Prevention Plan to the OES-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 is necessary, a transportation permit will be required. Questions regarding noxious weed law or noxious weed transportation permits should be directed to the Minnesota Department of Agriculture at noxiousweeds.mda@state.mn.us.</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 to the road surfaces. Failure to adhere to these 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 re-established MnDOT Seed Mix: Patch Mix at a rate of 30 lbs per acre. Patch Mix components and rates can be found in the Guide to the New 2024 MnDOT Seed Mixes (https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/download?docId=38590641). 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> <p>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>
Wetlands Coordination	<p>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. If ground-disturbing activities are proposed within MnDOT ROW, MnDOT may require an aquatic resource delineation to be performed throughout the areas of proposed disturbance. The delineation would 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>
Water Permits - Federal Agencies, Floodplains	<p>The project appears to cross several FEMA mapped floodplains. 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>

Cultural Resources	<p>The Applicant should provide summary of cultural field surveys and coordination with SHPO to date. If surveys have not been completed, 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 CulturalResources.dot@state.mn.us. In addition, the Applicant shall prepare a Post Review Discovery Plan (PRDP¹) and submit to MnDOT for review and contact information for CRU staff must be included in the PRDP. This plan should outline the steps to be followed in the event of an unanticipated discovery of archaeological materials, human remains, or burials, and include language specific to the coordination with MnDOT when a discovery is on MnDOT ROW. MnDOT Cultural Resources Unit (CRU) staff should be notified (CulturalResources.dot@state.mn.us) within 24 hours/days in the event of an unanticipated find on or adjacent to MnDOT property during construction.</p> <p>Additional archaeological investigations (e.g., literature reviews, reconnaissance surveys [if warranted]) <u>may be required</u> 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>
FHWA National Scenic Byway Program	<p>This project will affect two Minnesota Scenic Byways: Minnesota River Valley National Scenic Byway and Great River Road All-American Road. An additional recreational resource affected include Mississippi River Trail (MRT)/USBR 45.</p> <p>Under Title 23, USC, Section 162, National Scenic Byways Program; Scenic byways are designated as State, National or All-American because they possess one or more of six intrinsic qualities: scenic, cultural, recreational, natural, historic and archaeological qualities. An analysis of the physical and visual impact on each of these six intrinsic qualities should be conducted at each proposed crossing locations and/or collocated segments and where the proposed utility is within 7 miles of a byway to determine the route with the least adverse impact on the byway routes and corridors. At a minimum, this analysis should include:</p> <ul style="list-style-type: none">• Streetview Imagery or on-the-ground photographs• Photo / Visual Simulations (existing conditions and post-construction). During early planning phases of project, this may consist of typical drawings/photos of similar projects that have already been constructed. Later in Project design, this should include site-specific assessments depicting photo and visual simulations for users of the byway. <p>Each scenic byway has a leaders' group and/or stakeholder group; these groups should be contacted as part of the environmental review process. Scenic easements and areas should be investigated to identify any prohibitions or limitations that apply to land uses in the vicinity of the scenic byway. Relevant state and federal regulations governing scenic byways can be found in the MnDOT Utility Accommodation on Highway Right of Way Policy and Coordination Manual (both of which can be accessed here: https://www.dot.state.mn.us/policy/operations/oe002.html), 23 U.S.C. s. 162, and 23 CFR s. 645.209 (h).</p> <p>The Minnesota Mississippi River Parkway Commission (MRPC), established by Minnesota Statutes, section 161.1419, is the governing body for the Great River Road (GRR) in Minnesota. Minnesota Statutes, section 161.142 requires the commissioner of Transportation to construct and improve the GRR and assist the MRPC in carrying out its functions and duties. Due to the location of the Project with respect to the GRR, we recommend the Project proponent consult directly with the MPRC if they have not already done so. Please contact MPRC for the GRR and the MRT... at Chris Miller at chris@togpartners.com or info@mnmississippiriver.com, and the Minnesota River Valley National Scenic Byway Coordinator at Kristi.Fernholz@umvrdc.org, and keep MnDOT scenic byways staff apprised of these discussions.</p> <p>Applicant to develop mitigation measures for unavoidable impacts on intrinsic qualities within the two scenic byway corridors.</p>

Environmental Assessment Unit / Environmental Review	<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"> (1) All applicable State and Federal laws and regulations (2) Orders and decrees of bodies and tribunals with lawful jurisdiction over the work (3) Such local ordinances as are applicable to the work <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>
Soil Erosion and Sediment Control / Stormwater	<p>Given the size of the Project, we assume 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx).</p> <p>Temporary and permanent erosion and sediment control measures on MnDOT ROW must follow standards in the MnDOT Facility Design Guide Chapter 13 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx).</p> <p>Seeding on MnDOT ROW must follow standards in MnDOT Seeding Manual (https://www.dot.state.mn.us/environment/erosion/vegetation.html).</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>
Env Modelling and Testing (Noise)	<p>The Applicant needs to take all precautions to avoid impacts to existing noise mitigation devices (e.g., noise walls) and/or applications within MnDOT's ROW. If the Project has the potential to impact noise mitigation infrastructure, please notify MnDOT's Environmental Modelling and Testing Unit group for further guidance.</p>
District Permitting Staff	<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: http://www.dot.state.mn.us/utility/guidance.html. Alignments paralleling within or otherwise encroaching on trunk highway ROW will need further review as utility permit approvals cannot be assured without certain specifics not yet provided. Alignments crossing trunk highways should be perpendicular with poles located outside MnDOT ROW whenever possible. Exceptions to these crossing preferences will need to be coordinated prior to MnDOT utility permit application submittals.</p>

District 7 Planning Staff	<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 https://www.dot.state.mn.us/construction/index.html 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 district in which your project is located (District 6 and 7) at https://www.dot.state.mn.us/planning/10yearplan/district-chip.html 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><u>D7 Right-of-way:</u></p> <ol style="list-style-type: none">1. There is not enough detail (i.e. pole siting, etc.) to make specific comments on most areas of the routes.2. On TH 60 from Madison Lake to Elysian, there is very limited right-of-way between the highway and state trail for poles that are larger than the existing poles. <p><u>D7 Traffic:</u></p> <p>There is a possibility of installing a roundabout at the TH 13 & TH 60 intersection in the future. If HVTL infrastructure is anticipated near this intersection, locations should be coordinated with our Traffic division.</p>
District 6 Planning Staff	<p><u>Land Surveyor Principal • Surveys:</u></p> <p>Aside from new legislation regarding the allowance of Commission-permitted HVTL/Gen-Tie routes to longitudinally occupy portions of TH ROW not previously allowed by Policy, MnDOT’s Utility Accommodation & Coordination Manual https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/download?docId=1401425 offers guidelines and limitations to such placements based on safety and the proper function of the highway.</p> <p><u>Engineering Specialist • Permits Advertising Rochester:</u></p> <p>MnDOT requests offsets for the required working space needed to avoid a transmission line shutdown to replace MnDOT lighting. MnDOT wants to be able to replace lighting without interfering with proposed alignment. More detailed drawings would be needed to determine distance in areas of concern.</p> <p>Not allowed through interchange or over bridge. MnDOT will not allow the transmission lines to run through ramp areas as proposed in the straight-line alternative. Transmission line alignments will be required to go out an around the entire interchange.</p> <p>While current MnDOT Transmission Line Guidelines state a minimum 50-foot setback from bridges, D6 may request a 100-foot setback from bridges.</p> <p><u>Engineer • Project Management:</u></p> <p>This detailed Final Route map does not match the last exhibit showing the overview map. Confusion around final alternative we are to review.</p> <p>This Final Route overview map does not match the first exhibit showing the detailed map. Confusion around final alternative we are to review.</p> <p>These routes appear to be less problematic than along TH 14.</p>

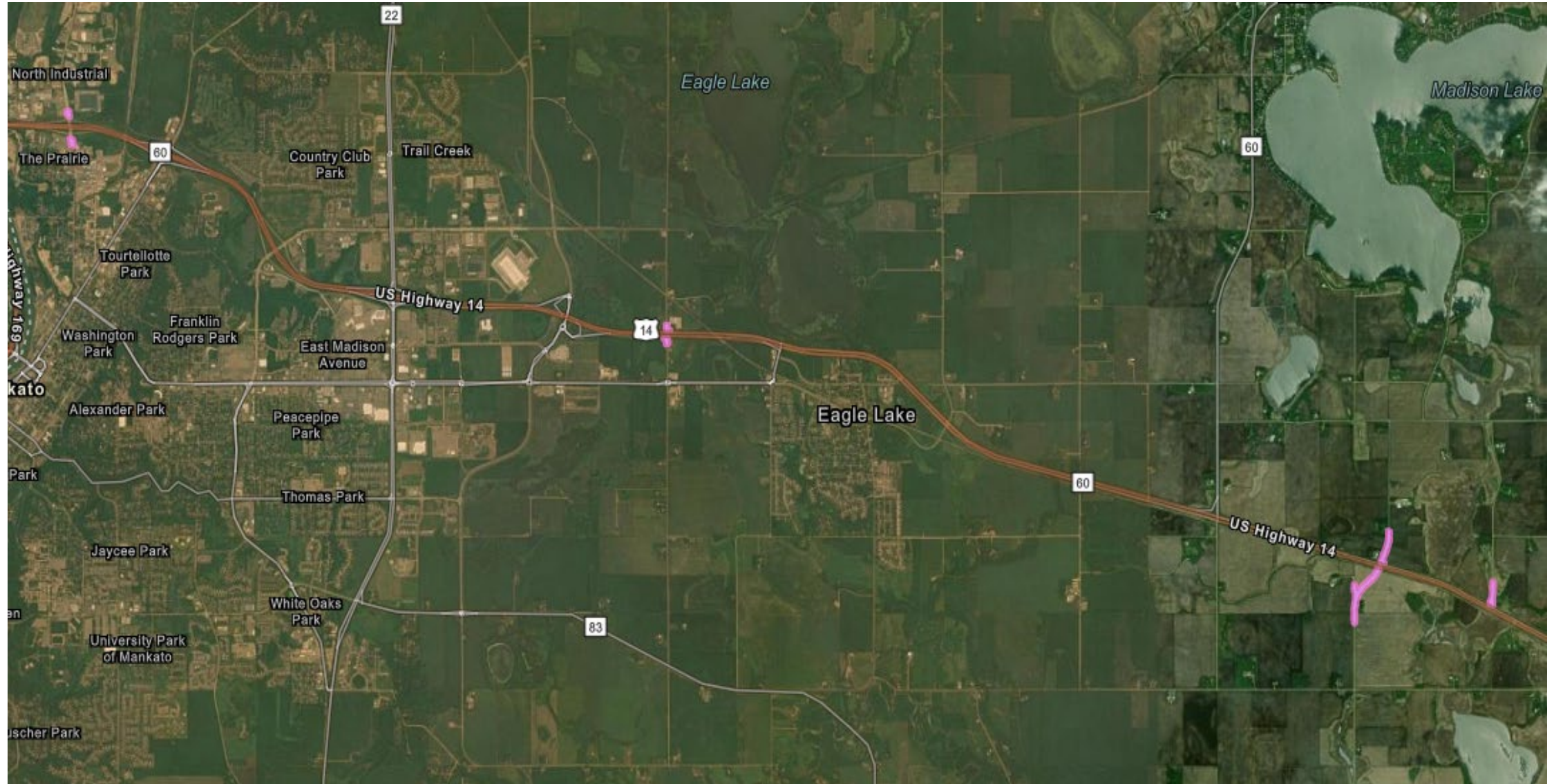
Design Support / Safety and Operations Management	<p><u>Powerlines</u>: Lateral placement of utility poles or non-crashworthy appurtenances must be placed outside the roadway's clear zone and should avoid the need for traffic barrier shielding. Any side slope grading within the roadway clear zone must 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) for a definition of "crashworthy" and other pertinent information.</p> <p><u>Pipelines</u>: Lateral placement of non-crashworthy appurtenances 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's clear zone must not result in a hazardous geometry for run-off vehicles. 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 (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) 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: https://www.dot.state.mn.us/utility/projectdelivery.html.</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. https://www.dot.state.mn.us/trafficeng/safety/shsp/</p>
Blowing Snow Control / Snow Fences	<p>Snow fences have been established in strategic locations across that state as a collaborative effort with landowners to trap snow from blowing across and accumulating on state highways. There may be living and/or structural snow fences in the vicinity of these ENM route alternatives. Further coordination with our Team is required should any of these alternatives move forward for consideration.</p> <p>If the utility project adversely impacts a snow fence causing the loss of blowing snow control functionality, the utility will must work with MnDOT to find a blowing snow control solution. Please refer to http://www.dot.state.mn.us/environment/livingsnowfence/ and Chapter 15D - Design for Blowing Snow Control found in MnDOT Facility Design Guide (https://roaddesign.dot.state.mn.us/facilitydesign.aspx) for more information. Snow Fence identified in area</p>
Railroad	<p>Railroads are private entities that conduct their own permitting process for utility impacts. MnDOT does not have jurisdiction in these areas. It is recommended that project coordination occurs directly with the affected railroad. Minnesota Rail Viewer Application (MnRail)</p>

ATTACHMENT 3

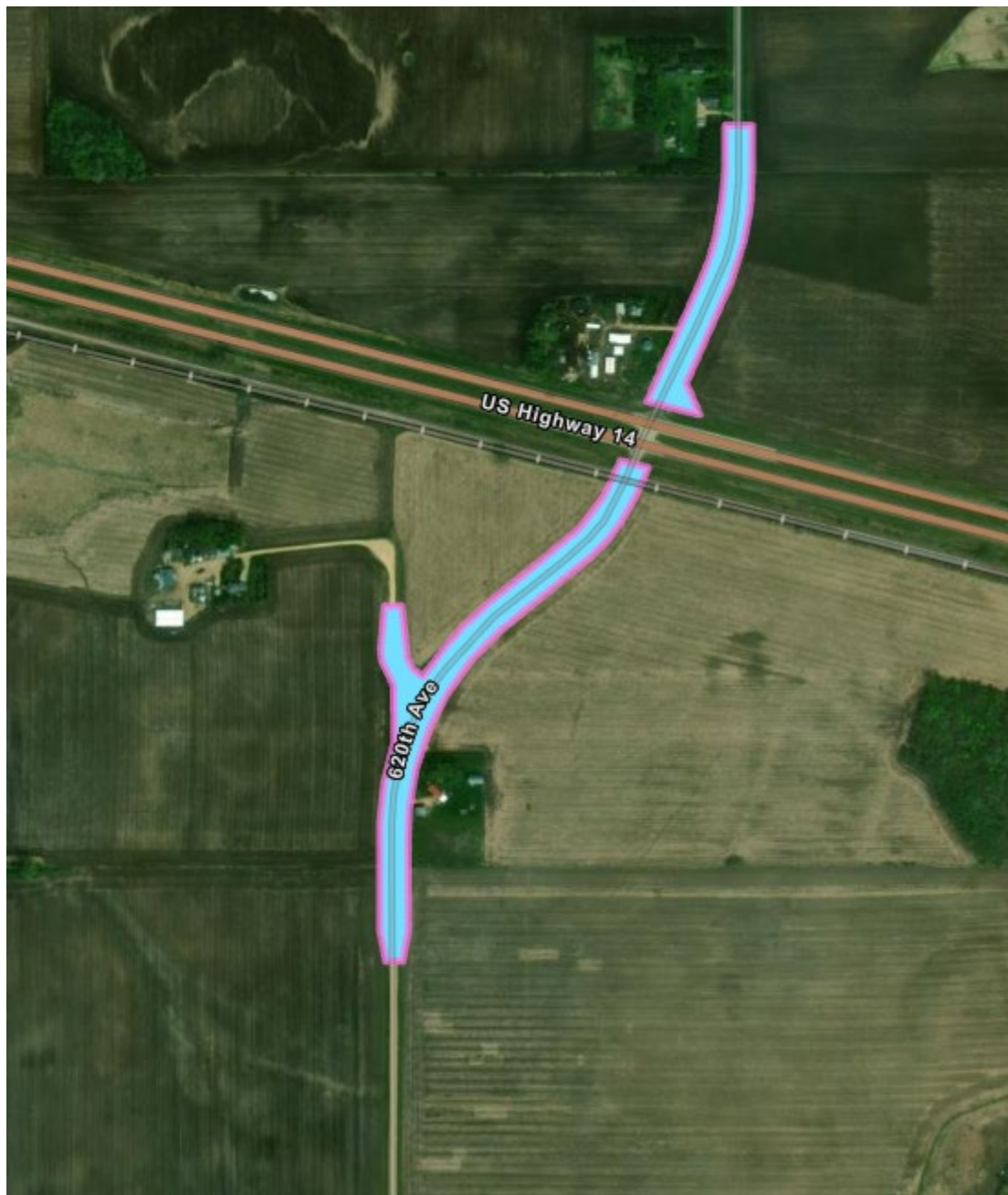
XCEL ENERGY: MANKATO - MISSISSIPPI RIVER TRANSMISSION PROJECT (MMRT) CN-22-532 and TL-23-157

DISTRICT 7 COUNTY TURNBACKS

Blue Earth County Future Turnbacks







Waseca County Future Turnbacks









