



## Minnesota Department of Transportation

### Office of Land Management

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December 30<sup>th</sup>, 2011

Ray Kirsch, Site Permit Manager  
Office of Energy Security  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198

RE: In the Matter of the Route Permit Application for the Parkers Prairie 115kV Transmission Line Project in Otter Tail County  
PUC Docket #: ET2/TL-11-867

Dear Mr. Kirsch,

On November 29<sup>th</sup>, 2011, the Minnesota Office of Energy Security (OES) issued a Notice Of Public Information and EA Scoping Meetings and request for public comments on the scope of the Environmental Assessment (EA) relating to the route permit application by Great River Energy (GRE) for the Parkers Prairie 115kV Transmission Line Project in Otter Tail County. The Minnesota Department of Transportation (MnDOT) has reviewed the route permit application regarding the proposed transmission line project and submits the following comments in response to the Notice.

MnDOT appreciates the opportunity to comment on the scope of the EA. MnDOT wishes to participate in the development of the EA so that it will contain a thorough evaluation of the effects various route proposals may have on the state transportation system. MnDOT's fundamental interest is to ensure that the EA identifies and quantifies, to the extent possible, any impacts the proposed high voltage transmission line (HVTL) may have on the safety of the transportation system, the effectiveness of the operations or maintenance of the state trunk highway system and any additional costs that may be imposed on the state trunk highway fund as a result of the location of the proposed HVTL.

MnDOT's approach to the HVTLs such as those involved in GRE's proposal is to work to accommodate these HVTLs within or as near as feasible to the trunk highway rights of way, based on an evaluation of the specific locations to ensure that appropriate clearance is maintained to preserve the safety of the traveling public and highway workers and the effective operation of the highway system now and in the foreseeable future. MnDOT has adopted a formal policy and procedures for accommodation of utilities on the highway rights-of-way (Utility Accommodation Policy"). A copy of MnDOT's policy can be found at <http://www.dot.state.mn.us/utility/files/pdf/appendix-b.pdf> .

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Based on our review of the application, it appears that the proposed route would cross Minnesota trunk highway (TH) 29. Highway crossings by utilities generally do not pose insurmountable difficulties in issuing a permit, and MnDOT routinely grants such permits to a variety of types of utilities. These permits usually have conditions associated with them, such as placement of the poles so that they do not become a physical obstruction that might be struck by an errant vehicles or block the visibility of traffic. MnDOT also does not permit utilities to run diagonally across intersections and prefers that crossings occur as close to right angles as possible. MnDOT has a long history of working with GRE and other utilities to establish appropriate conditions in locations where the utility seeks to cross a trunk highway.

Any HVTL construction work, including delivery or storage of structures, materials or equipment that may affect MnDOT right of way is of concern such that MnDOT should be involved in planning and coordinating such activities. If work is required within MnDOT right-of-way for temporary or permanent access, please coordinate with Jim Utecht, MnDOT District 4 Permits, at 218-846-7950 or [James.Utecht@state.mn.us](mailto:James.Utecht@state.mn.us) .

MnDOT has a continuing interest in working with the OES to ensure that possible impacts to highways, airports, waterways, rail lines and the environmentally significant areas of highway right-of-way are adequately addressed. We appreciate the opportunity to provide these comments.

Sincerely,



Stacy Kotch  
Utility Transmission Route Coordinator  
Minnesota Department of Transportation

cc: Jim Utecht – MnDOT District 4  
Rick Heuring – GRE  
Marsha Parlow - GRE

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