



Minnesota Department of Transportation

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March 7, 2016

David Birkholz, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

RE: In the Matter of the Application of Minnkota Power Cooperative, Inc. for a Route Permit under the Alternative Permitting Process for the Clearbrook-Clearbrook West Transmission Line in Clearwater County
PUC Docket No. ET-6/TL-14-665

Dear Mr. Birkholz,

On January 26th, 2016 the Minnesota Public Utilities Commission (Commission) and the Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping meeting and a request for public comment on the scope of the environmental assessment (EA) relating to the route permit application by Minnkota Power Cooperative for the Clearbrook – Clearbrook West Transmission Line Project in Clearwater County, Minnesota. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed 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 the Minnkota Power 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/policy/operations/op002.html>

MnDOT's policy seeks to permit utilities to occupy portions of the highway rights of way where such occupation does not put the safety of the traveling public or highway workers at risk or unduly

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impair the public's investment in the transportation system. The EA should assess the relationship of the placement of the proposed utility poles and the location of the highway activities for both the current traveled way and the future traveled way since future improvements to the highway may change the proximity of the proposed HVTL and make the line close enough to occupy a portion of the highway right of way.

A review of route permit application shows that both the proposed HVTL would cross trunk highway (TH) 92 south of the city of Clearbrook where the line parallels County Road 74. This intersection is a low volume road with existing right turn lanes on TH 92 in both directions. The current Average Daily Traffic (ADT) volumes do not show any greater needs than what is in place. Therefore, there are no proposed or anticipated changes along the affected section of TH 92 at this time.

The crossing of TH 92 appears to be perpendicular to the highway with the proposed HVTL line crossing over to the north side of County Road 74 "outside" or to the east of the intersection with TH 92. Highway crossings by utilities, generally speaking, 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 ensuring that the wires are high enough that they will not pose a hazard to highway users or maintenance employees. Highway crossings should occur as close to right angles as possible.

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 Stephen Frisco, District 2A Permits at 218-755-6553 or Stephen.Frisco@state.mn.us.

MnDOT has a continuing interest in working with the Commission, the DOC and Minnkota Power to ensure that possible impacts to highways, airports, waterways, rail lines and the environmentally significant areas of highway right of way are adequately addressed.

Sincerely,



Stacy Kotch
Utility Transmission Route Coordinator

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