



## Minnesota Department of Transportation

### Office of Land Management

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September 13, 2016

Bill Storm, 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 for the MPL-Laporte 115 kV Project in Clearwater and Hubbard Counties

PUC Docket No. ET-2/TL-16-327

Dear Mr. Storm,

On August 15<sup>th</sup>, 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, Inc. (Minnkota) for the MPL-Laporte 115 kV Project in Clearwater and Hubbard Counties, 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 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

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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 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 a portion of the route would parallel trunk highway (TH) 200. The paralleling of TH 200 may be close enough to occupy a portion of the highway right of way. Minnkota has been proactive in consulting with MnDOT to establish an acceptable route within this area. MnDOT District 2 permitting staff has met with the Department of Natural Resources (DNR) and a MnDOT forester to review the areas where trees will need to be cleared in our right of way. After viewing other possible routes and taking into consideration the comments from the DNR, MnDOT concludes that in this area, the proposed route is the best possible solution. In addition to applying for a Utility Accommodation on Trunk Highway Right Of Way (Form 2525), Minnkota will need to apply for a Miscellaneous Permit (Form 1723) for tree clearing as well as reimburse MnDOT for said trees at a rate that local DNR Foresters find comparable to standard rates with similar removals on other public land.

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 Engineering Specialist at 218-755-6553 or [Stephen.Frisco@state.mn.us](mailto:Stephen.Frisco@state.mn.us) .

MnDOT has a continuing interest in working with the Commission, the DOC and Minnkota 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,



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Stacy Kotch  
Utility Transmission Route Coordinator  
Minnesota Department of Transportation

Enclosures:

cc: Stephen Frisco – MnDOT District 2A Engineering Specialist

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