



**Minnesota Department of Transportation**

**Office of Land Management**

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December 27<sup>th</sup>, 2013

Richard Davis, Environmental Review Manager  
Energy Environmental Review and Analysis (EERA)  
Minnesota Office of Energy Security  
85 7th Place East, Suite 500  
St. Paul, MN 55101

RE: In the Matter of the Odell 200MW Wind Farm  
PUC Docket Number: IP-6914/WS-13-843

Dear Mr. Davis,

On November 20th, 2013, the Minnesota Office of Energy Security (OES) issued a Notice of Application Acceptance, which includes a public comment period regarding the scope of the environmental report (ER) and the draft site permit that is under consideration with respect to Odell Wind Farm, a 200 MW Large Wind Energy Conversion System for the Odell Wind Farm in Cottonwood, Jackson, Martin and Watonwan Counties. 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 draft site permit. MnDOT notes that there are several provisions that may have impacts on the state transportation system.

The draft site permit should include language specifying that the Permittee shall obtain all relevant permits or authorizations from road authorities relating to any electric cables and/or feeder lines that may be proposed to be placed in a public road right-of-way. 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> . MnDOT's policy seeks to permit utilities to occupy portions of the trunk 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. Compliance with MnDOT's Utility Accommodation Policy, and similar policies of other road authorities, should be included as a condition of the site permit.

Based on the information provided in the Site Permit Application, it appears that the project area does not *directly* abut a state trunk highway. Although MnDOT has no scheduled projects in the immediate area, there are scheduled projects nearby (<http://www.dot.state.mn.us/d7/projects/hwy60stjames/>). Therefore, there may be highway-related considerations related to oversize/overweight hauling of wind turbines and equipment. Specifically, these large loads of freight are often transported along nearby interregional corridors such as US

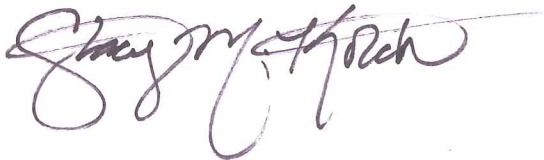
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71 and TH 60. Because MnDOT's highway construction activities could impact the Applicant's plans to haul oversize loads to the proposed site, the Applicant will need to coordinate with MnDOT when planning such loads. If the Odell Wind Farm or its associated facilities should happen to intersect with the trunk highway system, the Applicant will need to apply for and obtain permits for those locations.

Any wind farm 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. The site permit should include language specifying that the Permittee shall obtain all relevant permits from road authorities relating to the transport of oversize materials and equipment related to the project over public roads, as well as installation of facilities that may be proposed to occupy portions of public road rights-of-way. Please note that if work is required within MnDOT right of way for temporary or permanent access, such work should be coordinated with Marc Fischer in District 7B Permits Office at 507-831-8012 or [Marc.Fischer@state.mn.us](mailto:Marc.Fischer@state.mn.us).

Sincerely,



Stacy Kotch

Utility Transmission Route Coordinator

Minnesota Department of Transportation

cc: Marc Fisher – MnDOT District 7B Permits  
Ronda Allis – MnDOT District 7 Principal Planner

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