

APPENDIX H

OPEN HOUSE MATERIALS

PROJECT PROFILE

Forks – Rost (Jackson County) 161 kV Transmission Line Project

PROJECT OVERVIEW

ITC Midwest is planning to build a new 161 kV (161,000 volt) electric transmission line that travels between ITC Midwest's proposed Forks Substation and the proposed Rost Substation that will be built by Great River Energy in Jackson County. The proposed line is approximately 8.7 miles long. The construction of ITC Midwest's proposed Forks Substation is also part of the project.

The route for the transmission line may change and the final route will be determined by the Minnesota Public Utilities Commission (PUC). (Please see map of the proposed route in Jackson County on the back.)

Why is this line needed?

The Forks – Rost 161 kV line is a reliability-driven project that will improve transmission system reliability in the Jackson and Nobles County, Minnesota areas. The project was the outcome of a joint area reliability study between Great River Energy, Missouri River Energy Services and ITC Midwest.

The Forks – Rost project will provide numerous benefits and drive value for electric consumers locally and regionally. When completed, this transmission line will:

- Increase transmission capacity to **improve system reliability**
- Enhance grid resilience to better **withstand extreme weather**
- **Better serve current and future needs** through increased system capacity
- **Reduce electric system congestion** and improve grid efficiency

Whose approval is required to build this line?

ITC Midwest will submit a route permit application to the PUC. After the application is submitted, the PUC and Department of Commerce, Energy Environmental Review and Analysis (DOC EERA) staff will facilitate public meetings and provide other opportunities for input from the public and regulatory agencies. The DOC EERA will prepare an environmental assessment for the project. Construction cannot begin until a route permit is granted by the PUC.

What is being done to ensure this line will be safe?

This line will be designed to meet and even exceed the National Electrical Safety Code (NESC), the nationally-recognized design standard in the United States. Among other things, these codes require construction to meet clearance requirements and withstand extreme weather conditions. As the line owner, ITC Midwest will make sure that the line is clear of trees and other vegetation.



FOR THE GREATER GRID.

ITC MIDWEST 123 Fifth Street SE, Cedar Rapids, IA 52401
Locations: Albert Lea, Des Moines, Dubuque, Iowa City, Lakefield, Perry
877.ITC.ITC9 (877.482.4829) | www.itc-holdings.com

PROJECT PROFILE

Forks – Rost (Jackson County) 161 kV Transmission Line Project

What is ITC Midwest doing to minimize impact on landowners and current land uses?

ITC Midwest seeks to minimize the impact of the project on existing land uses. ITC Midwest will follow the routing criteria set forth in Minnesota Rules 7850.4100 through 7850.4400 in designing ITC Midwest's proposed route. ITC Midwest is committed to protecting the environment and will fully compensate landowners for any damages that occur during the construction process. To minimize the footprint of the line, ITC Midwest plans to use steel monopoles.

How will ITC Midwest work with landowners?

Landowner outreach will begin at our open houses where ITC Midwest representatives will discuss explain the process and their rights. ITC Midwest representative will work with landowners to secure voluntary easements upon receiving the route permit from the PUC.

Landowners are compensated for permitting ITC Midwest to secure an easement on their property. ITC Midwest understands and appreciates the impact that new line construction has on landowners and pledges to treat *all* landowners with the utmost respect during this important process.

Forks – Rost project proposed route corridor route in Jackson County



Project Contacts

If you have questions, you can contact ITC Midwest using our toll-free customer line at 1-877-482-4829. Once construction begins, Ryan DeSotel and Chris Davidson will be ITC Midwest's project leads.

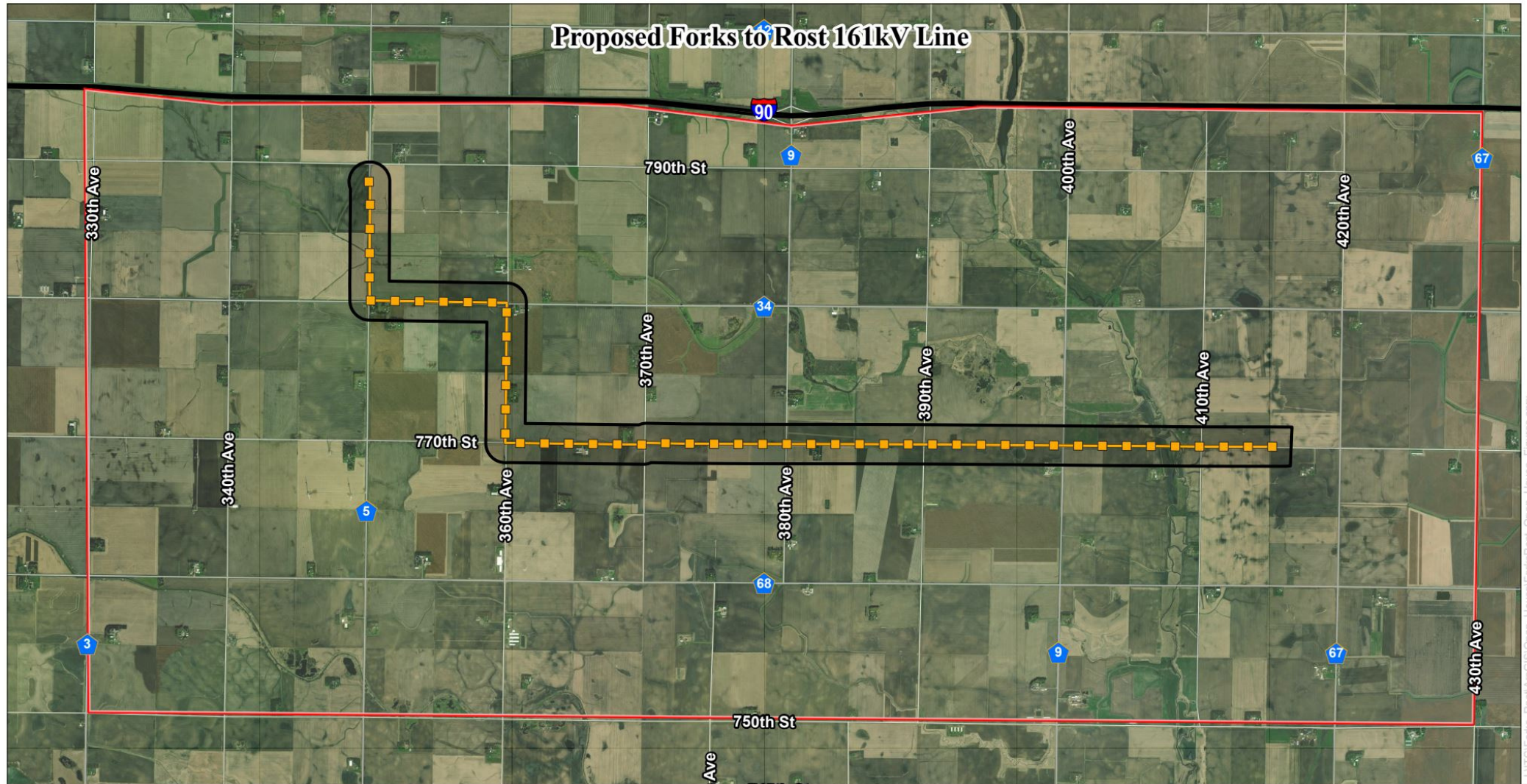


Ryan DeSotel
Project Manager
(319) 297-6796
RDeSotel@itctransco.com



Chris Davidson
Field Supervisor
(920) 306-0577
CDavidson@itctransco.com

Proposed Forks to Rost 161kV Line





**FOR THE
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ITC Midwest is providing an opportunity for you to ask questions and provide comments about the proposed Forks - Rost 161 kilovolt (kV) Electric Transmission Line Project.

OPEN HOUSE

Wednesday, January 10, 2024

3:30 – 6:00 p.m.

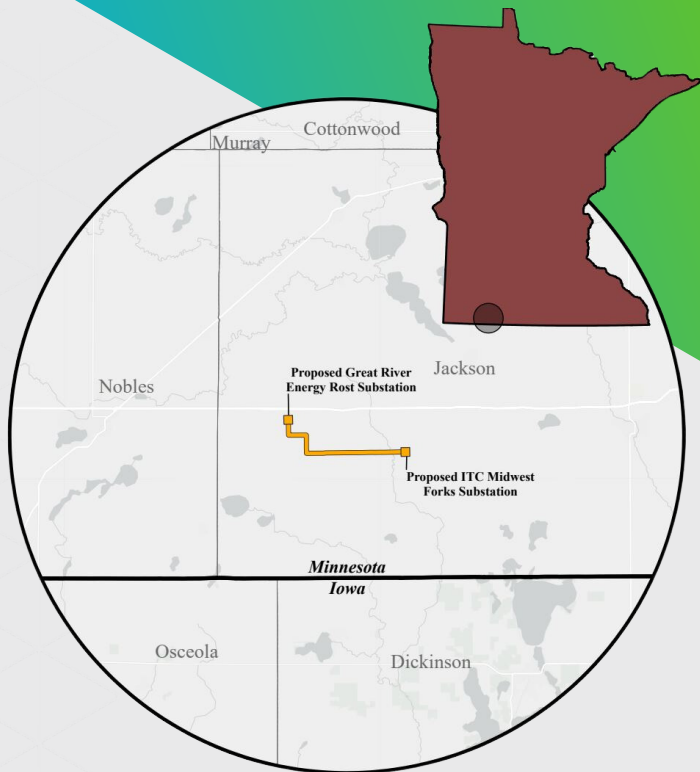
(Make up date : Tuesday, January 16)

Lakefield Multi-Purpose Center

**112 Main Street
Lakefield, MN**

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**JOIN ITC MIDWEST TO LEARN MORE
ABOUT THIS RELIABILITY INITIATIVE**



Note: Map is for illustrative purposes and is not indicative of a proposed or suggested route.

ITC Midwest

20789 780th Avenue
Albert Lea, MN 56007



**FOR THE
GREATER GRID®**



**FOR THE
GREATER GRID.**

THANKS FOR ATTENDING!

ITC Midwest is providing an opportunity for you to ask questions and provide comments about the proposed Forks - Rost 161 kilovolt (kV) Electric Transmission Line Project.

Please fill out the information below and mail back by January 31, 2024.

Name _____

Property Information _____

Township Range & Section _____

Comments _____



**FOR THE
GREATER GRID.**

ITC Midwest
123 5th Street SE
Cedar Rapids, IA 52401

Name	Address	Phone
Dem Riley	33762 760 TH St. & Lake	
Dennis Rossow	80611 430 TH Ave	
Dwain Korman	30603 430 TH Ave	
Jim Schubert (Post Township)	39553 820 TH St.	
Rob Toomey	GRE	763-445-5996
Matt Hagelin	GRE	(612) 254-5053
Roger Puck		
Terry Post		
SOHN WERTZ III POST TWP CHAIR	42549 800 ST.	507-841-0085
Craig Stude	82750 330 TH Ave	501-360-7683
Curt Stude	82207 330 TH Ave	360-7684



Date _____

APPENDIX I

AFFECTED LANDOWNER LIST

Forks-Rost Corridor Landowners

Owner	C/O	Address	City, State, Zip Code
Adam Onken		35153 780th St	Round Lake, MN 56167
Arnold Kazemba Credit Trust, et al	C/O James Kazemba	35408 760th St	Round Lake, MN 56167
Behrends Farms LLC	C/O James Behrends	24598 State Hwy 264	Brewster, MN 56119
Brenda Rosin Separte Share Trust		1673 Thomas Dr	East Troy, WI 53120-2606
Brian Post Separate Share Trust		43646 760Th St	Lakefield, MN 56150
Carolyn Synerholm	C/O Northwestern Farm Mgmt. Co.	301 South O'Connell St	Marshall, MN 56258
Charles & Gayle Schmidt		36292 780th St	Round Lake, MN 56167
Cheryle L Wilson Mn Trust		34444 320th St	Ruthven, IA 51358
Dale & Jan Knips Trusts		38185 760th St	Lakefield, MN 56150
Dale & Mary Hesemann Revocable Living Trusts		79250 380th Ave	Lakefield, MN 56150
Darwin & Jody Soleta		84837 380th Ave	Okabena, MN 56161
Dennis & Barbara Christoffer		PO Box 511	Lakefield, MN 56150
Duane Voss Revocable Living Trust		38247 770th St	Lakefield, MN 56150
Dylan & Alisa Majerus		36051 780th St	Round Lake, MN 56167
Dylan Majerus		36051 780th St	Round Lake, MN 56167
Freking Family Farms Inc		Po Box 244	Jackson, MN 56143
Gerald & Gwenlyn Fleace		35131 780th St	Round Lake, MN 56167
Great River Energy		12300 Elm Creek Blvd	Maple Grove, MN 55369
Harlan & Sandra Rademacher		Po Box 133	Lakefield, MN 56150
James & Kimberly Kazemba and Shirley Kazemba Rev Int Trust		35408 760th St	Round Lake, MN 56167
James Kazemba		35408 760th St	Round Lake, MN 56167
Janet K Fischer Revocable Living Trust		607 Milwaukee St	Lakefield, MN 56150
Jerry & Nancy Ackermann		39750 820th St	Lakefield, MN 56150
Jerry Beck Trust		39358 270th St	Worthington, MN 56187
Jim Vanderveen		77964 350th Ave	Round Lake, MN 56167
John Post		36574 Co Hwy 35	Worthington, MN 56187
Kenneth & Margaret Hesemann Trusts		78381 390th Ave	Lakefield, MN 56150
Kevin & Dana Kay Schmid		32804 780Th St	Worthington, MN 56187
Leon & Holly Rozeboom and Jordan Rozeboom Rev Trust		823 Crooked Tree Ln	Dakota Dunes, SD 57049
LHS Investors Group LLP		1362 Springfield Pkwy	Jackson, MN 56143
Lisa Severance		21686 Fellows Ave	Rushmore, MN 56168

Forks-Rost Corridor Landowners

Owner	C/O	Address	City, State, Zip Code
Mark & Darcy Murphy		36870 770th St	Round Lake, MN 56167
Mark & Stacie Soleta		38629 790th St	Lakefield, MN 56150
Michael & Ann Trust		303 Hickory Dr	Tahlequah, OK 74464
Naomi Lubben		35280 790th St	Worthington, MN 56187
Paul & Karlyne Ackerman Revocable Living Trusts		40703 770th St	Lakefield, MN 56150
Peter Riley, et al	C/O Michael Riley	31060 820th St	Brewster, MN 56119
Robert & Connie Untiedt		41817 770th St	Lakefield, MN 56150
Thomas Dekoster, et al		200 4th Ave Se	Lemars, IA 51031
Timothy & Sherri S Baumgarn		36375 770th St	Round Lake, MN 56167
Victor & Darlene Gruber Trust et al		520 2nd St Court	West Fargo, ND 58078
Wade Brunk		77884 350th Ave	Round Lake, MN 56167

APPENDIX J

AGRICULTURAL IMPACT MITIGATION PLAN

FORKS 161 kV SWITCHING STATION AND FORKS-ROST 161 kV TRANSMISSION LINE PROJECT



ITC Midwest LLC

Agricultural Impact Mitigation Plan

**Docket Number
ET6675/TL-24-232**

Prepared by:



September 2024

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DEFINITIONS

Agricultural Land	Land that is actively managed for cropland, hayland, or pasture, and land in government set-aside programs.
Certifying Agent	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Cropland	Land actively managed for growing row crops, small grains, or hay.
Decertified or Decertification	Loss of Organic Certification.
Easement	The agreement(s) and/or interest in privately owned Agricultural Land held by ITC Midwest by virtue of which it has the right to construct, operate and maintain the transmission line together with such other rights and obligations as may be set forth in such agreement.
Final Clean-up	Transmission line activity that occurs after the power line has been constructed. Final Clean-up activities may include: removal of construction debris, de-compaction of soil as required, installation of permanent erosion control structures, final grading, and restoration of fences and required reseeding. Once Final Clean-up is finished, Landowner will be contacted to settle all damage issues and will be provided a form to sign acknowledging final construction settlement.
Inspector	Full-time on-site inspector retained by ITC Midwest to verify compliance with requirements of this AIMP during construction of the transmission line. The Inspector will have demonstrated experience with transmission line construction on Agricultural Land.
ITC Midwest	ITC Midwest LLC, a Michigan limited liability company. May also include agents and contractors of ITC Midwest, where appropriate.
Landowner	Person(s), or their representatives, holding legal title to Agricultural Land on the transmission line route from whom ITC Midwest is seeking, or has obtained, a temporary or permanent Easement. "Landowner" includes Tenant, if any.
Non-Agricultural Land	Any land that is not "Agricultural Land" as defined above.
Prohibited Substance	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.600 through 7 CFR 205.605 using the criteria provided in 7 USC 6517 and 7 USC 6518.
Project	Proposed 161 kilovolt transmission line from new Forks Switching Station to new Rost Substation in Jackson County, Minnesota
Proposed Route	<u>"Route" means the location of a high voltage transmission line between two end points. The route may have a variable width of up to 1.25 miles. (Minnesota Statute 216E.01)</u>
Right-of-Way	The Agricultural Land included in permanent and temporary Easements which ITC Midwest acquires for the purpose of constructing, operating and maintaining the transmission line. Also "ROW."
Subsoil	Soil that is not Topsoil and located immediately below Topsoil.

Tenant	Any person(s) lawfully renting or sharing land for agricultural production which makes up the “Right-of-Way” as defined in this AIMP.
Tile	Artificial subsurface drainage system.
Topsoil	The uppermost horizon (layer) of the soil, typically with the darkest color and highest content of organic matter.

1.0 INTRODUCTION

ITC Midwest LLC (ITC Midwest) developed this Agricultural Impact Mitigation Plan (AIMP) with the Minnesota Department of Agriculture (MDA) in compliance with Minnesota Statutes Section 216E.10, subdivision 3(b). The AIMP identifies measures ITC Midwest will take during construction of its Forks 161 kilovolt (kV) Switching Station and Forks-Rost 161 kV Transmission Line Project (Project) to avoid, minimize, mitigate, repair, or provide compensation for impacts on Agricultural Land.

The Project will include the construction of the new Forks Switching Station southwest of the City of Lakefield, Minnesota, and a new approximately 8.5 mile long 161 kV high voltage transmission line from the new Forks Switching Station to the new Rost Substation to be permitted separately and constructed by Great River Energy, east of the City of Worthington, Minnesota. The AIMP and its provisions will be implemented during construction and restoration activities that ITC Midwest undertakes for the Project prior to filing notice of completion of construction with the Minnesota Public Utilities Commission (Commission).

ITC Midwest has asked the Commission to approve a Proposed Route with a width of 1,500 feet (750 feet on either side of the proposed transmission centerline). At a minimum, the Project will have a Right-of-Way (ROW) that is 100 feet wide (typically 50 feet on each side of the transmission centerline).

Capitalized words and other defined terms have the meanings given to them in this AIMP. Use of "Landowner" in this AIMP may be construed to read "Landowner and/or Tenant."

This AIMP and its construction standards and policies apply only to construction activities occurring on privately-owned Agricultural Land. If agricultural drain Tiles are encountered, whether on Non-Agricultural Land or Agricultural Land, ITC Midwest will implement construction standards relating to the repair of Tile on Agricultural Lands discussed further in this AIMP.

No organic farms have been identified along or adjacent to the Proposed Route. If that changes prior to construction of the Project, portions of this AIMP will be updated to identify standards and policies as they apply to Organic Agricultural Land, and those portions of the AIMP will apply only to the types of lands defined in the National Organic Program Rules (7 C.F.R. Parts 205.100; 205.101, and 205.202).

Construction standards and policies identified in this AIMP can be modified through terms in an easement or other agreement between ITC Midwest and the Landowner, as appropriate. In such cases, the Easement or other agreement will control.

2.0 GENERALLY

ITC Midwest will negotiate in good faith with each Landowner to secure an agreement containing the conditions or provisions necessary to implement the provisions of this AIMP. The mitigative actions set forth in this AIMP are subject to negotiation and approval or change by Landowner so long as such changes are negotiated with and acceptable to ITC Midwest. Mitigative actions will be executed by qualified contractors retained by ITC Midwest, unless otherwise specified or agreed upon by the Landowner. ITC Midwest and the Landowner may agree that certain activities will be performed by Landowner. ITC Midwest maintains a damage claim policy outlining

compensation policies for damage to property, including but not limited to crop damages, and will provide a copy of this policy to the Landowner during Easement acquisition negotiations.

Unless otherwise specified in this AIMP or in an easement or other agreement negotiated between ITC Midwest and Landowner, construction standards and policies or mitigative actions will be implemented within 90 days after completion of Final Clean-up activities on Agricultural Land. Weather conditions or other circumstances identified by mutual agreement between Landowner and ITC Midwest may delay implementation of mitigative actions after Final Clean-up. Where practicable, ITC Midwest may make temporary repairs. These temporary repairs may be made to minimize additional property damage or interference with the Landowner's access to the subject Agricultural Land.

ITC Midwest or its contractors will implement the construction standards and policies or mitigative actions identified within this AIMP so long as such activities do not conflict with any applicable Federal or State rules, regulations, permits, licenses, approvals, or conditions obtained by ITC Midwest for the Project. Should any activity within this AIMP be determined to be unenforceable due to Federal or State rules, regulations, permits, licenses, approvals, or conditions, ITC Midwest will inform the Landowner and will identify a reasonable alternative activity.

Prior to ROW preparation for, or construction of, the Project, ITC Midwest will make a good faith effort to provide each Landowner with contact information, including a phone number and address, that can be used to contact ITC Midwest regarding any impacts to Agricultural Land or other construction-related concerns or questions. ITC Midwest will provide updated information to the Landowner within a reasonable time of any change to ITC Midwest contacts.

3.0 CONSTRUCTION STANDARDS

3.1 MITIGATIVE ACTIONS

ITC Midwest will reasonably restore and/or compensate the Landowner, as appropriate, for damages caused by ITC Midwest as a result of Project construction, and as outlined in this plan. ITC Midwest will decide whether to restore land and/or compensate the Landowner after a discussion with the Landowner.

3.2 ADVANCE NOTICE OF ACCESS

ITC Midwest will make good faith efforts to provide notice to the Landowner in advance of the commencement of construction activities on Agricultural Land. Notice may include personal contact, email, letter, or telephone contact.

3.3 ITC MIDWEST AGRICULTURAL INSPECTOR

ITC Midwest's Agricultural Inspector will:

1. Be a full-time member of ITC Midwest's inspection team.
2. Be responsible for verifying ITC Midwest's compliance with the provisions of this AIMP during construction.

3. Work collaboratively with other members of ITC Midwest's construction team and land agents in achieving compliance with this AIMP.
4. Observe construction activities on Agricultural Land on a regular basis.
5. Have the authority to stop construction activities that are determined to be out of compliance with the provisions of this AIMP.
6. Document instances of noncompliance and work with construction personnel to identify and implement appropriate corrective actions as needed.
7. Provide construction personnel with training on provisions of this AIMP before construction begins.
8. Provide construction personnel with field training on specific topics as needed.

3.4 POLE PLACEMENT AND TEMPORARY ACCESS ROUTES

During the design of the Project, ITC Midwest's engineering, land, and permitting staff will seek input from Landowner, as practicable, to identify pole placement locations and to address issues that arise regarding poles. Prior to construction, the land agents will review the staked pole locations with the Landowner when requested to do so by the Landowner.

ITC Midwest will discuss the location of temporary access routes to be used for construction purposes with the Landowner.

- A. Temporary access routes will be designed so as to not impede proper drainage and will be built to mitigate soil erosion on or near the temporary access routes.
- B. After Final Clean-up, temporary access routes may be left intact through mutual agreement of the Landowner and ITC Midwest unless otherwise restricted by Federal, State, or local regulations.
- C. If a temporary access route is to be removed, the Agricultural Land upon which the temporary access route is constructed will be returned to its previous use and restored to reasonably equivalent condition as existed prior to construction.

3.5 SWITCHING STATION CONSTRUCTION

The Project will require construction of the new Forks Switching Station. During construction, ITC Midwest will segregate Topsoil that must be removed for groundwork. At ITC Midwest's sole discretion, excess Topsoil may be made available to a Landowner who wishes to use this Topsoil on their property in an upland location. If the Topsoil is made available to a Landowner in other areas of the Project, it will be provided "as is" and the Landowner, not ITC Midwest, will be responsible for verifying that the quality of the Topsoil meets the Landowner's farming requirements. The Landowner is solely responsible for obtaining any required local, state, or federal permits or permissions that may be necessary for the placement of Topsoil on his or her property.

3.6 AGRICULTURAL TILE

ITC Midwest will contact an affected Landowner for their knowledge of Tile locations prior to installation of the transmission line. ITC Midwest will attempt to identify Tile if the Landowner does not know if Tile is located at the proposed pole location. Tile that is damaged, cut, or removed as a result of ITC Midwest's location efforts will be promptly repaired. The repair will be reported to the Inspector.

If Tile is damaged by Project construction, the Tile will be repaired with materials of the same quality as that which was damaged. If Tiles on or adjacent to the transmission line construction area are adversely affected by construction, ITC Midwest will take such actions as are necessary to restore the Tile function, including the relocation, reconfiguration, and replacement of the existing Tile. ITC Midwest will correct Tile repairs, as needed, after completion of the transmission line construction, provided the repairs were made by ITC Midwest or their agents or designees.

The affected Landowner may elect to negotiate a fair settlement with ITC Midwest for the Landowner to undertake the responsibility for repair, relocation, reconfiguration, or replacement of damaged Tile. In the event the Landowner chooses to undertake the responsibility for repair, relocation, reconfiguration, or replacement of the damaged Tile, ITC Midwest will have no further liability for the identified damaged Tile.

The following standards and policies apply to the Tile repairs completed by ITC Midwest:

1. Tiles will be repaired with materials of the same or reasonably comparable quality as that which were damaged.
2. If water is flowing through a damaged Tile, temporary repairs will be promptly installed and maintained until such time that permanent repairs can be made.
3. Before completing permanent Tile repairs in an area where a Landowner or ITC Midwest has identified a potential concern arising from Project construction, Tiles will be examined within the work area to check for Tile that might have been damaged by construction equipment. If Tiles are found to be damaged, they will be repaired so they operate as well after construction as before construction began.
4. ITC Midwest will make efforts to complete permanent Tile repairs within a reasonable timeframe after Final Clean-up, taking into account weather and soil conditions.
5. Following completion of Final Clean-up and damage settlement, ITC Midwest will be responsible for correcting and repairing Tile breaks, or other damages to Tile systems that are discovered on the Right-of-Way to the extent that such breaks are the result of Project construction. These damages are usually discovered after the first significant rain event. ITC Midwest will provide the Landowner with contact information should Tile damage issues be identified after Final Clean-up. ITC Midwest will not be responsible for Tile repairs performed by the Landowner.

ITC Midwest will be responsible for installing additional Tile or other drainage measures, including adding Topsoil, as necessary to properly drain wet areas along the Right-of-Way (ROW) caused by the construction of the Project.

3.7 TOPSOIL SEGREGATION

In order to protect and preserve the Topsoil during Project construction, ITC Midwest will separate the Topsoil from the other subsoil materials when all earthmoving activities, excavation, or trenching are taking place. There may be limited situations where excavated subsoil will be temporarily stored on adjacent, undisturbed Topsoil. In these situations, subsoil will be returned to the excavation with as little disturbance of the underlying Topsoil as practicable. During the excavation backfill process, the subsoil will be backfilled into the excavations first and compacted as necessary, followed by Topsoil replaced to the approximate locations from which it was removed.

3.8 SOIL COMPACTION/RUTTING

Compaction will be alleviated as practicable on cropland traversed by construction equipment. ITC Midwest will work with the Landowner to alleviate compaction during suitable weather conditions in a mutually agreeable manner.

ITC Midwest will repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. If, by mutual agreement, the Landowner repairs such damage, ITC Midwest will reimburse the Landowner for the reasonable cost of labor and the use of equipment to repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. ITC Midwest will make such payments within a reasonable period of time following final clean up and after receiving a statement substantiating the Landowner's repair costs.

After Final Clean-up, ITC Midwest will pay for the reasonable cost of repairs to the Landowner's equipment if the equipment is damaged during repair of compaction, ruts, erosion, and/or washing of soil by materials or debris ITC Midwest left on the ROW during construction.

3.9 EXCESS SOIL AND ROCKS

Excess soil and rock will be removed from the site unless otherwise requested by the Landowner. After Final Clean-up and restoration of Agricultural Lands, ITC Midwest will make good faith efforts to obtain written acknowledgement of completion of such activities from the Landowner.

3.10 CONSTRUCTION DEBRIS

ITC Midwest will remove construction-related debris and material that is not an integral part of the transmission line from the Landowner's property at ITC Midwest's cost. Such material may include excess construction materials or litter generated by the construction crews.

3.11 PROCEDURES FOR DETERMINATION OF DAMAGES AND COMPENSATION

ITC Midwest will maintain a procedure for processing Landowner claims for construction-related damages, including but not limited to crop damages. The procedure is intended to standardize and minimize Landowner concerns regarding the recovery of damages, to provide a degree of

certainty and predictability for Landowner and ITC Midwest, and to foster good relationships among ITC Midwest and Landowner over the long term. A copy of the procedure will be provided to Landowner during easement acquisition negotiations.

Damage claim negotiations between ITC Midwest and any affected Landowner will be voluntary in nature. ITC Midwest will offer to compensate Landowners according to the terms of ITC Midwest's damage claim policy in effect at the time the easement is executed and recorded. The compensation offered is only an offer to settle, and the offer shall not be introduced in any proceeding brought by the Landowner to establish the amount of damages ITC Midwest must pay.

3.12 NOXIOUS WEED CONTROL

When requested, ITC Midwest will work with neighboring Landowners to determine adequate noxious weed control measures on lands owned by ITC Midwest for the Forks Switching Station. The intent of such noxious weed control measures is to prevent the spread of noxious weeds onto adjacent Agricultural Land. Any noxious weed control spraying will be in accordance with State of Minnesota regulations.

3.13 SOIL CONSERVATION PRACTICES

Soil conservation practices such as terraces and grassed waterways that are damaged by the transmission line's construction will be restored to their pre-construction condition as near as possible. ITC Midwest will attempt to work with the Landowner to identify and document the pre-construction conditions of these features.

3.14 IRRIGATION

The Proposed Route does not intersect an operational spray irrigation system. If an irrigation system is installed across or adjacent to the Proposed Route prior to Project construction, ITC Midwest will work with the Landowner to establish an acceptable amount of time the irrigation system may be out of service.

APPENDIX K
VEGETATION MANAGEMENT PLAN

FORKS 161 kV SWITCHING STATION AND FORKS-ROST 161 kV TRANSMISSION LINE PROJECT



ITC Midwest LLC

Vegetation Management Plan

**Docket Number
ET6675/TL-24-232**

Prepared by:



September 2024

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1.0 INTRODUCTION

ITC Midwest LLC (ITC Midwest) is applying to the Minnesota Public Utilities Commission (Commission) for a Route Permit to construct a new 161 kilovolt (kV) transmission line (the Project) from the new Forks Switching Station to the new Rost Substation in Jackson County, Minnesota. The Project will include the construction of the new Forks Switching Station southwest of the City of Lakefield, Minnesota, and a new approximately 8.5 mile long 161 kV high voltage transmission line from the new Forks Switching Station to the new Rost Substation to be permitted separately and constructed by Great River Energy, east of the City of Worthington, Minnesota. The Project is located entirely in Jackson County, Minnesota in Ewington and Rost Townships.

2.0 PLAN OVERVIEW

ITC Midwest has developed this Vegetation Management Plan (VMP) for the Project to address an anticipated Route Permit condition from the Commission for the Project related to vegetation management.

The primary goal of this VMP is to construct the Project and maintain the Project right-of-way (ROW) in a manner that ensures a safe and reliable transmission line. In addition to the primary goal stated above, this VMP also addresses the following goals:

- Develop and maintain cooperative relationships with landowners along the ROW to accommodate reasonable requests and preferences related to ROW vegetation management.
- Comply with applicable requirements in federal, state, and local permits, licenses, and/or easements.
- Limit the introduction and spread of noxious weeds and invasive species (NWIS) due to the Project.

This VMP reflects vegetation management practices that are consistent with applicable North American Electric Reliability Corporation (NERC) requirements, as well as requirements set by the Commission. This VMP also incorporates, where applicable, the Minnesota Department of Commerce's Generic Vegetation Establishment and Management Plan Guidance.

3.0 SITE DESCRIPTION

3.1 EXISTING CONDITIONS

ITC Midwest has asked the Commission to approve a Proposed Route with a width of 1,500 feet (750 feet on either side of the proposed transmission centerline). At a minimum, the Project will have a ROW that is 100 feet wide (typically 50 feet on each side of the transmission centerline).

The Proposed Route includes open agricultural areas, scattered small, forested areas, rural residential development, and hydrologic features, including streams, wetlands, and small ponds. Surface elevations within the Proposed Route range from 1,406 to 1,489 feet above sea level. Slopes vary throughout the Proposed Route, but the terrain is predominantly flat.

3.2 PROJECT COMPONENTS.

3.2.1 Transmission Line Right-of-Way

Once a Route Permit is issued, ITC Midwest land agents will work directly with individual landowners to acquire the necessary easements for the Project. At a minimum, the Project will require a total ROW of 100 feet wide (typically 50 feet on each side of the transmission centerline).

3.2.2 Temporary Construction Areas

Temporary construction areas can include wire stringing areas, off ROW access routes, and laydown yards. Leases or easements will be acquired for these areas, if necessary.

4.0 RIGHT-OF-WAY PREPARATION AND CONSTRUCTION

4.1 LANDOWNER NOTIFICATION

Landowners will be notified prior to clearing activities, as required by applicable permit conditions. Among other things, the notification letter will inform landowners:

- The ROW will be staked indicating the extent of clearing activities.
- Landowners can request to keep any of the trees and materials. Requested wood will be cut to no less than 8-foot segments. Requested whole trees, trunks, wood chips or mulch will be placed just outside of the ROW in an upland area and at a location on the Landowners' property for the materials to be hauled away by the Landowner.
- All unwanted woody materials will be removed from the landowner's property.
- Herbicides to prevent regrowth of woody vegetation may be used, the method of application, and the opportunity for them to request that no herbicides be used.

4.2 INITIAL RIGHT-OF-WAY CLEARING

It is the standard practice of ITC Midwest to remove all woody vegetation within the right-of-way for the construction of new high voltage transmission lines. Such vegetation may interfere with or restrict safe construction of the transmission line. Cleared rights-of-way provide for safer working conditions and necessary access for large construction equipment including trucks, cranes, and boom lifts. A cleared ROW also minimizes conflicts for stringing operations. Vegetation will be limited to the permanent ROW, temporary ROW, danger trees off ROW, and off-ROW access.

To the extent the Project schedule allows, vegetation clearing will be conducted on firm or frozen ground to minimize rutting and soil erosion. If schedules or weather do not allow for work on firm ground, construction mats will be used as necessary to prevent rutting and erosion.

Mechanical equipment such as feller bunchers or brush cutters may be used for clearing. In areas where clearing with large equipment is not viable, clearing will be done with hand tools such as chain saws.

Vegetation within the ROW will be cut at or slightly above the ground surface depending on terrain. Any tree stumps or surface roots in managed turf grasses will be ground to slightly below grade and the hole backfilled with dirt and seeded with a similar turf grass mixture. Any stumps outside of managed turf grass areas will typically be cut or ground such that no more than two inches remain above grade depending on terrain. ITC does not typically grub stumps or roots to minimize soil impacts and erosion potential.

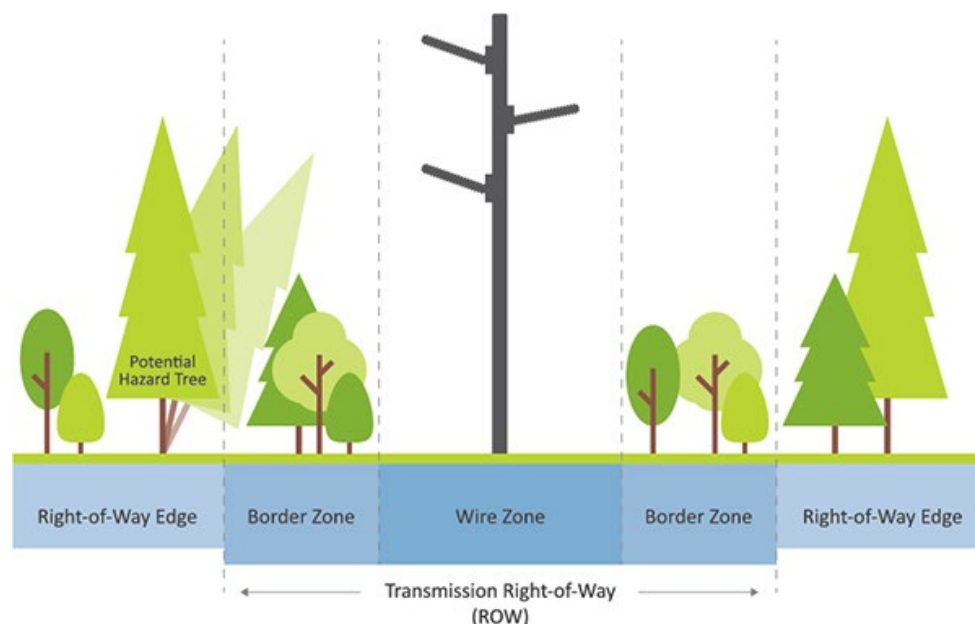
Trees, trunks and/or limbs cut on private property are typically cut to approximately 8-foot lengths unless the landowner requests longer lengths.

Trees (>6 inches diameter at breast height (dbh) or >20 feet tall) cut from a wetland will be moved outside of the wetland. If the materials will be chipped or shredded, that work will be completed outside of wetlands.

All materials a landowner has requested to keep will be stacked outside the ROW in an upland area for the Landowner to haul away at their expense. All materials a landowner does not wish to keep will be stacked inside the ROW for further processing and disposal.

Any materials a landowner does not wish to keep will be removed from their property. These unwanted materials may be placed in a composting site, or disposed of at landfill.

Figure 4.2-1 – Standard Vegetation Management Practices



4.3 BEST MANAGEMENT PRACTICES

All work will comply with the Stormwater Pollution Prevention Plan (SWPPP) developed to comply with the Minnesota Pollution Control Agency's (MPCA) Construction Stormwater permit. The SWPPP will define best management practices (BMPs) for erosion and sedimentation prevention and mitigation. Due to entanglement issues with small animals, use of erosion control blanket

shall be limited to 'bionetting' or 'natural netting' types and specifically not products containing plastic mesh netting or other plastic components.

5.0 HERBICIDES

Landowners within the Project ROW will be notified at least 14 days in advance if herbicides will be used on the ROW. The notice will indicate what herbicides will be used and the methods of application (e.g., broadcast, selective spot treatment, or basal treatment).

Herbicides may be used during vegetation removal or maintenance to control the re-sprout of stumps of incompatible species or to control invasive or noxious weed species. If a landowner prohibits their use, herbicides will not be used on that landowner's property. ITC Midwest will consult with agencies regarding the use of herbicides in areas of their permit authority. Herbicides will not be used within 75 feet of the vegetative buffer zone of waterbody crossings, unless approved prior to use. Herbicides will be used in accordance with the manufacturer specifications and all applicable federal and state regulations. Herbicides used in or near wetlands and waterbodies must be designated for use in wet areas as identified by manufacturer specifications and allowed by federal or state regulations.

6.0 NOXIOUS WEEDS AND INVASIVE SPECIES CONTROL

During all phases of Project activities including clearing, construction, operation and maintenance, the Project will minimize the introduction and spread of noxious weeds and invasive species (NWIS) along the ROW by implementing BMPs that discourage the spread of identified species, and routine cleaning of equipment to remove dirt and plant debris. The goal is to prevent new infestations on the ROW as a result of construction activities. It is important to note that there may be NWIS already existing on private parcels along the ROW. While this does not preclude the Project from responsibility for managing the spread of invasive species, this ability may be limited by pre-existing conditions.

ITC Midwest has identified the following mitigation measures to be implemented that should prevent the introduction of NWIS on lands disturbed by construction activities. The methods discussed in this section relate only to construction and restoration activities and not vegetation maintenance activities.

- To prevent the introduction and spread of NWIS into the project area from offsite locations, equipment will be cleaned prior to arrival onsite. Visible dirt must be removed from all equipment using high pressure compressed air blowers or brushing.
- The contractor(s) must maintain record of cleaning for each piece of equipment used onsite. This information will be available upon request.
- Non-compliance with equipment cleaning requirements may warrant a stop work order to be issued. Construction activity could then recommence only after project equipment has been removed from the site, and adequately cleaned.
- Only weed-free materials (e.g., straw bales, bio-rolls, mulch) will be used in erosion control and only weed-free seed will be used during revegetation.

- Equipment and clothing will be inspected for invasive materials.
- Collected invasive materials will be secured and disposed of at an offsite location to avoid dispersal.
- Minimally disturbed areas will be allowed to restore naturally with landowner approval.
- Major infestation areas may be treated with multiple methods, such as the recommended herbicides (if approved by the landowner) and/or by mechanical methods such as mowing or burning. The contractor will be required to obtain the necessary permits and/or certifications for the use of applicable herbicides.

At this time, no prairies or Minnesota Department of Natural Resources (MnDNR) lands are expected to be crossed. In the event any prairie crossings are identified, ITC Midwest will work with the MnDNR to ensure that any mitigation or minimization measures are developed before construction in that area.

7.0 REVEGETATION AND RESTORATION

Once construction ceases, the ROW will be inspected to identify areas impacted by Project activities. Typical impacts might include rutting, soil compaction, soil exposure, and damage to native vegetation, all to varying degrees. Areas of minimal disturbance will be allowed to regenerate naturally with landowner approval. Such areas may include those where erosion is limited to dispersed areas and surrounding existing vegetation provides control of sediments; existing vegetation is matted down due to vehicle traffic; or areas where drilling spoils are raked into existing vegetation. These areas will be identified at the time of restoration.

All conditions as specified in local, state, and federal permits and private landowner agreements for final restoration and cleanup will be met. Revegetation and restoration of disturbed areas associated with Project activities are intended to protect wetland and water resources from issues associated with sedimentation, to protect wildlife habitat, and reduce the movement of NWS species within the ROW.

Restoration activities may, as needed, include:

- Collection and disposal of all work-related debris and trash.
- Discing or grading to repair rutting.
- Regrading areas disturbed by construction or clearing to reflect pre-construction topography.
- Applying temporary cover and/or temporary seed to minimize erosion potential to the extent practicable.
- Permanent seeding of non-agricultural areas disturbed by transmission line structures or other facilities to prevent runoff.
- Unless timber, slash or chips have been requested by the landowner, all residual vegetation materials will be removed and properly disposed of off-site.

- Trees (>4 inches diameter at breast height (dbh) or >20 feet tall) cut from a wetland will be moved outside of the wetland. If the materials will be chipped or shredded, that work will be completed outside of wetlands.
- Brush within a wetland may be cut with a brush mower or similar device as long as material from outside the wetland is not brought into the wetland. If sufficient brush is present such that debris will exceed 4 inches, sufficient brush will be hauled out for processing in an upland area.
- Wood chips will not be placed in wetlands, and wood chips placed in uplands will not exceed 1 inch in depth.
- Within wetlands, all construction matting will be removed and vegetation will be allowed to regenerate naturally.

7.1 TEMPORARY REVEGETATION AND RESTORATION

Temporary revegetation will be implemented to quickly establish vegetative cover with the primary purposes of minimizing soil erosion and reducing the potential for the establishment of noxious weeds. The temporary seed mix is considered a cover crop, is made up of annual grasses, has rapid germination, and provides a quick ground cover. This seed mix is not intended to provide multi-year cover. Unless specifically requested by landowners or land management agencies, ITC Midwest does not plan to establish temporary vegetation on cultivated land or in areas of open water.

Temporary seeding of cover crop will occur in locations where unfrozen, bare soil surface conditions and ruts will not be permanently restored within 14 days of completion of active work (seven days for an area draining to a discharge point on the Project that is within one mile of a special or impaired water and flows to that special or impaired water). Temporary restoration activities will include the repair of rutted surfaces and an even broadcast-seeding of the temporary cover-crop seed mix at a rate of 80 lbs./acre. No mulch is to be applied in wetland areas.

Temporary vegetation must be placed in accordance with the SWPPP or in consultation with ITC Midwest. Temporary vegetation establishment may be expected to be successful between April 1 and September 30. Establishment of temporary vegetation is unlikely to be successful outside of this time window. Temporary use of mulch to stabilize soils should be applied outside of the April 1 through September 30 window.

Straw or wood chip mulch (less than or equal to 1 inch depth) may be used to help stabilize areas or bare soils in uplands only during the establishment of temporary vegetation or during the period between October 1 and April 1 (winter). The contractor will apply mulch during the establishment of temporary vegetation as requested by the landowner, specified in licenses or permits, or as requested by ITC Midwest.

Mulch, free of soil material and derived from onsite sources, may be used to protect areas where bare soils have been exposed due to tree clearing and construction activities. In winter situations, wood chips or other appropriate BMPs such as erosion control blankets may be used to provide protection for bare soils exposed due to construction activities where out-of-season seeding is not applicable.

Mulch derived from onsite locations may be spread up to 1 inch deep in upland areas to provide ground protection along access paths. Upon abandonment of access routes, mulch is to be spread evenly to a depth no greater than one inch. Mulch is not to be used within wetlands. Straw mulch used on the Project sites will consist of state certified weed-free material. Straw mulch may be used outside of the seeding window as a temporary erosion control measure, followed by temporary or permanent seeding at the earliest possible time after the April 1 seeding date. The contractor will be responsible for locating and documenting the source of certified weed-free mulch. Copies of the applicable documentation must be made available upon request to the applicable agencies. Straw mulch will be applied as previously described.

7.2 PERMANENT REVEGETATION AND RESTORATION

Appropriate vegetative cover of the ROW will be required along the entire length of the ROW. Since this project does not require major grading activities, in many cases natural revegetation by early successional native species following tree clearing is expected to occur. In areas where native species voluntarily revegetate the ROW, active restoration may not be required. Monthly monitoring during the first year, and adaptive management will be required to ensure that NWIS are controlled, that desirable native plant species become the dominant vegetation communities in natural areas, and that bare soils are quickly stabilized to reduce erosion. In areas of minimal disturbance, vegetation will be allowed to regenerate naturally.

Where standing water is not present, and where surrounding vegetation is dominated by abundant native species, the seeding of bare soils, using the temporary cover-crop seed mix may be sufficient for cover while native species revegetate the area. ITC Midwest may consult with the appropriate agencies during the construction period to assess application of techniques in specific locations. Permanent seed mixes will include native seed varieties commonly found and/or available from local seed distributors. The permanent seed mixes are designed to augment the natural colonization of the ROW by local, native seed sources.

On private agricultural lands, ITC Midwest's land agents will work with landowners to develop appropriate measures for reseeding of disturbed lands. Unless requested by the landowner, a native area vegetation seed mix will be used.

8.0 SEEDING METHODS AND TIMING

Revegetation and restoration of disturbed areas associated with construction activities are intended to protect wetland and water resources from issues associated with sedimentation, to protect wildlife habitat, and reduce the movement of NWIS species within the ROW. Oversight for the implementation of revegetation and restoration procedures will be provided by ITC Midwest.

Seed used will be purchased on a Pure Live Seed (PLS) basis for seeding revegetation areas. Seed tags will identify:

- Purity;
- Germination;
- Date tested;
- Total weight and PLS weight;
- Weed seed content; and
- Seed supplier's name and business information.

Seed will be used within 12 months of testing as required by applicable state rules and regulations. The seed tags on the seed sacks will also certify that the seed is “noxious weed free.” Seed rates used on the project will be based on PLS rate, not actual weight. The species components of individual mixes are subject to availability at the time of purchase. Grass species may be substituted with alternative native or non-invasive species that are included in Natural Resource Conservation Service guidelines and subject to approval by ITC Midwest.

Seed tags must be collected by the contractor and provided to ITC Midwest during seeding activities. The tags will be reviewed by ITC Midwest or its agent prior to use to ensure that the seed mix complies with specifications described herein. Legume seed (where specified) will be treated with inoculants specific to the species and in accordance with the manufacturer’s recommended rate, appropriate for the seeding method (broadcast, drill, or hydroseeding).

Seedbed preparation and seeding are to occur immediately following completion of construction activities and site cleanup in any given location. Where applicable, soil will be tilled to a minimum depth of four inches with a disc, field cultivator, or chisel plow to prepare the seedbed, breaking up large clumps and firming the soil surface. Prior to seeding, prepared beds should be sufficiently soft to allow for seed penetration and mulch anchoring, while sufficiently firm to provide surface soil stability. Seeding and mulching should occur parallel to ground contours as practicable.

In order to minimize ground disturbance along the entire ROW, forested areas will be cleared, but roots and stumps will be left in place where feasible and practicable. Within areas of cleared forest, it may not be practical to access large areas of ground with seeding and seedbed preparation equipment. In these areas, smaller vehicles may be required to perform tasks such as smoothing ruts, preparing seedbeds with small rakes, and surface packing after seeding. The contractor will work with ITC Midwest to develop strategies to work around stumps. Fertilizers and other soil amendments are not recommended and will only be applied as requested by and agreed to with landowners.

8.1 SEEDING METHODS

Drilled seed will be sown at a depth of 0.25 inches. Seeding equipment will be able to accommodate and uniformly distribute different sizes of seed at the required depth. Seeding mechanisms will be able to evenly distribute different seed types at the rates specified. Seedbed soil is to be suitably firmed immediately following seed drilling. Within cleared areas, it is assumed that seed drilling will be limited by the presence of stumps and roots left in place to retain the soil surface.

Broadcast seeding will occur as specified in the seed mixes. Seed is to be uniformly distributed by a mechanical, hand-operated seeder, or in small seeding areas, by hand. Following seeding, the surface is to be raked with a cultipacker, harrow, or hand rake. The bed is to be firmed as appropriate to site conditions.

Hydroseeding will occur as specified in the seed mixes. Seed will be applied in a broadcast, hydromulch slurry. The hydromulch seed mix will allow the contractor to see where application has taken place, ensuring uniform coverage of the seeding area. The hydroseeder must provide for continuous agitation of slurry and provide for a uniform flow of slurry. Hydroseed slurry is not to be held in the tank for more than one hour prior to application.

8.2 SEED MIXES

ITC Midwest will strive to use seed mixes which are native to Minnesota. Seed mixes are based on regionally appropriate state seed mixes that are recommended by the Minnesota Board of Soil and Water Resources (BWSR) and the Minnesota Department of Transportation (MnDOT). The mixes in Table 1 are reflective of the Project location, with road ROWs for the entirety of the route. ITC Midwest will work with landowners to identify the preferred seed mixes to be used on exposed soils on their property.

Table 1. Proposed Project Seed Mixes			
Seeding Area	Seed Mix Name (State Seed Code)	Purpose	Rate (Pure Live Seed ["PLS"])
General	Cover Crop: Winter Wheat (WW) or Oats (O)	Short term stabilization for spring and summer (O) and fall (WW)	100 lbs/ac.
Small areas (less than one acre)	Patch Mix (PM)	Reseeding small areas (<1acre) due to disturbance, maintenance, utility work, etc. Also for 2-5 year soil stabilization.	30 lbs/ac.
Private turf	Residential Turfgrass (RT)	Boulevards and other urban roadsides where low-maintenance and salt-tolerant turfgrass is needed.	200 lbs/ac.
Mesic General Roadside	Mesic Inslope (MI)	Inslopes within 15 feet of shoulder and medians ≤55 feet wide; roads with <30,000 cars per day	65 lbs/ac.
Sandy General Roadside	Sandy Inslope (SI)	Inslopes within 15 feet of shoulder and medians ≤55 feet wide; areas with sandy soils.	65 lbs/ac.
Wet Roadside Ditches	Wet Ditch (WD)	Wet ditches and some stormwater plantings; sites with wet soils mowed once per year or less. Meets pollinator habitat requirements.	20 lbs/ac.
Upland Roadside Native Vegetation	Southern Shortgrass Roadside (SSR)	Inslopes and medians when native vegetation is required; sites with dry soils mowed twice per year or less. Meets pollinator habitat requirements.	26 lbs/ac.
Mesic Roadside Native Vegetation	Southern Tallgrass Roadside (STR)	Backslopes and dry ditch bottoms; sites with moderate moisture mowed once per year or less. Meets pollinator habitat requirements.	26 lbs/ac.*

8.3 EROSION CONTROL

State certified weed-free straw mulch will be applied to disturbed, non-cultivated upland areas if requested by landowners or land managers. The contractor will be responsible for acquiring certified weed-free straw mulch from approved sources and copies of applicable documentation

must be provided to ITC Midwest. Mulch will be required on disturbed, exposed soils on all slopes greater than five percent, and on dry, sandy soils prone to erosion by wind or rain.

Straw mulch will be applied at a rate of two tons per acre in upland areas unless otherwise specified in permit conditions. Mulch will be uniformly distributed by mechanical blower or by hand in areas where vehicular access is limited. Mulch stalks are to be a minimum of eight inches long in order to facilitate adequate anchoring. Mulch will be crimped to a depth of two to three inches using a mulch anchoring device where accessible. In areas where stumps and slash limit access by vehicles, mulch may be applied by hand at the specified rate and anchored in place by a liquid tackifier approved by ITC Midwest.

8.4 TIMING

Seeding periods for application of the native area vegetation seed mix and the wet meadow seed mix are limited to April 1 to June 30, during spring, or when soil temperatures have fallen below 55 degrees Fahrenheit in the fall. Outside of these time windows, temporary seed mixes, applied according to temporary cover-crop seed mix specifications are to be used. Prior to installation of native seed mixes, the seedbed should be mowed and prepared for final seeding.

Seeding of the ROW is to occur within seven days of final cleanup/grading activities during the growing season (April-September). Where seeding is not possible within 48 hours, temporary stabilization using erosion control matting or mulch is required. Dormant seeding may be used after soil temperatures have fallen below 55 degrees Fahrenheit. Lower temperatures prevent seed from germinating. Dormant seeding will only be allowed using seed drills and is not permitted when soil is frozen or when snow is present. If dormant seeding is performed, temporary erosion control measures will be installed within seven days of seeding. Erosion control measures will consist of anchored straw mulch at a rate of two tons per acre, anchored hydromulch at a rate of two tons per acre, or erosion control blankets.

9.0 MONITORING

ITC Midwest will monitor and control NWIS within the ROW through the construction of the Project. During Project construction, ITC Midwest will inspect and provide information regarding infestations of NWIS along the ROW to the appropriate agencies. ITC Midwest will meet easement and lease conditions and obligations and will continue to work with landowners and the appropriate agencies to achieve standards set forth in easement or lease agreements during construction and subsequent maintenance activities.

As part of the construction of the Project and the related restoration and revegetation activities, ITC Midwest will monitor areas where seeding and erosion control measures have been implemented and will follow-up with reseeding measures where vegetative cover by the specified seed mix, or revegetation by the local, native seed source is inadequate to provide long term stability and sustainable native plant communities.

10.0 OPERATIONS AND MAINTENANCE

10.1 ROUTINE INSPECTIONS

ITC Midwest will conduct aerial and/or ground visual inspections of the ROW to ensure a safe and reliable corridor and to ensure access for maintenance activities or emergencies. Maintenance work will be based on the findings of those inspections.

10.2 ROUTINE MAINTENANCE

ITC Midwest will periodically clear vegetation from the existing ROW to maintain a safe and apparent corridor, and to allow access for maintenance activities or emergencies. Clearing typically includes brushing equipment traveling down the ROW, which may consist of tracked or rubber-tired equipment to cut brush and trees, hand-held saws or other manual methods. Small cuttings will be left in place, non-merchantable timber or slash will be disposed of where it originates, hauled off-site, or chipped and evenly spread on the ROW.

Project-specific maintenance techniques and mitigation measures include:

- If the surface is unstable such that rutting, soil compaction, or soil mixing may occur, low ground-pressure equipment will be used or maintenance equipment will be operated from weed-free mats or temporary timber corduroy that will be removed upon completion of the work.
- Vegetation management requirements stipulated in any MnDNR, MnDOT, or local governmental unit licenses or permits will be followed.
- All extra work areas (such as staging areas and additional spoil storage areas) will be located outside of wetland boundaries, where topographic conditions permit. If topographic conditions do not permit, an alternate location or matting will be used to minimize impacts.

Due to the typically unstable nature of soils in wetlands, and to preserve wetland hydrology and function, special practices are necessary for some operation and maintenance activities as follows:

- If the surface is unstable such that rutting, soil compaction, or soil mixing may occur, low ground-pressure equipment will be used or maintenance equipment will be operated from weed-free mats or temporary timber corduroy that will be removed upon completion of the work.
- Wetlands generally revegetate naturally. If no standing water is present, temporary cover crop as specified may be planted at a rate of 80 pounds per acre. No fertilizer or lime will be applied in wetlands.

10.3 EMERGENCIES

It may be necessary for ITC Midwest to cut, trim or remove vegetations due to damage caused by weather events or accidents. Such work is typically done to facilitate restoring services on the line. Staff will attempt to notify the landowner prior to entering the property.