From: Britta Bergland
To: melissa.collins@state.mn.us; Warzecha, Cynthia (DNR)
Cc: Kristin Lenz; Sage Williams; travis.m.oates@sargentlundy.com
Subject: Dairyland Power Wabasha Relocation Project - Request for Pre-Application Meeting
Date: Thursday, November 16, 2023 11:16:07 AM
Attachments: [redacted].png
[redacted]20231019.pdf
[redacted]51020.pdf

Good morning, Melissa and Cynthia -

Dairyland Power Cooperative (Dairyland) is proposing to relocate approximately 14 miles of 161-kilovolt (kV) high voltage transmission line (HVTL) and construct a new substation in Wabasha County, Minnesota as part of the Wabasha Relocation Project. The Project starts northeast of Plainview, MN and ends east of Kellogg, MN near the Mississippi River. The Proposed Route would primarily follow State Highway 42 and would also involve a crossing of State Highway 61 (Great River Road, Designated Scenic Byway) southwest of Kellogg.

The Project is a reroute of approximately 10.4 miles of the existing Dairyland LQ34 161-kV transmission line located on the existing CapX2020 Hampton-Rochester-LaCrosse 345-kV structures. In July 2020, the Midwest Independent System Operator (MISO) approved a long-range transmission portfolio including a new Wilmarth-North Rochester-Tremval transmission line. This new 345-kV line would utilize the double circuit capability of the CapX2020 system between North Rochester and Alma, Wisconsin. Therefore, Dairyland's existing 161-kV circuit must be removed and relocated to make room for a new, second 345-kV circuit on the existing CapX2020 structures.

Dairyland is currently gathering information in preparation for filing its route permit application with the Minnesota Public Utilities Commission, which it plans to submit in early 2024.

I have attached a Project fact sheet along with a map that shows the current location of the transmission line and the initial Proposed Route. I have also included a map of route alternatives considered by Dairyland. The Project website also contains additional information: https://dairylandtransmissionproject.com/

We would appreciate any input that the Minnesota DNR may have on the Project and would like to propose a pre-application meeting to introduce the Project and review the initial route with interested MDNR staff. Would there be a good time in the next few weeks? Thank you!

Britta

Britta Bergland
612.746.3673 direct
612.220.9692 mobile
britta.bergland@merjent.com

merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414

612.746.3660
www.merjent.com

DEPARTMENT OF NATURAL RESOURCES

Formal Natural Heritage Review - Cover Page

See next page for results of review. A draft watermark means the project details have not been finalized and the results are not official.

Project Name: Dairyland Wabasha Relocation Project

Project Proposer: Dairyland

Project Type: Utilities, Transmission (electric, cable, phone)

Project Type Activities: Tree Removal;Waterbody or watercourse impacts (e.g., dewatering, discharge, excavation, fill, runoff, sedimentation, changes in hydrology));Wetland impacts (e.g., dewatering, tiling, drainage, discharge, excavation, fill, runoff, sedimentation, changes in hydrology)

TRS: T108 R11 S1, T109 R10 S18, T109 R10 S4, T109 R10 S5, T109 R10 S7, T109 R10 S8, T109 R11 S13, T109 R11 S23, T109 R11 S24, T109 R11 S25, T109 R11 S26, T109 R11 S35 +

County(s): Wabasha

DNR Admin Region(s): Central

Reason Requested: PUC Site or Route Application

Project Description: Transmission line rebuild. Wetlands and waterbodies will be spanned; other construction methods and timing TBD.

Existing Land Uses: Ag, road right-of-way, forested patches, some wetlands/waterbodies.

Landcover / Habitat Impacted: Ag, road right-of-way, forested patches

Waterbodies Affected: waterbodies will be spanned.

Groundwater Resources Affected: TBD

Previous Natural Heritage Review: No

Previous Habitat Assessments / Surveys: No

SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	Comments	Tree Removal - Recommendations
Ecologically Significant Area	Comments	Potential RNC - Will Require Consultation MBS Sites - Recommendations Protected Wetlands: Calcareous Fens
State-Listed Endangered or Threatened Species	Needs Further Review	State-protected Species in Vicinity
State-Listed Species of Special Concern	Comments	Recommendations
Federally Listed Species	Comments	Visit IPaC for Federal Review RPBB High Potential Zone

DEPARTMENT OF NATURAL RESOURCES

December 13, 2023

Project Name: Dairyland Wabasha Relocation Project
Project Proposer: Dairyland
Project Type: Utilities, Transmission (electric, cable, phone)
Project ID: MCE #2023-00935

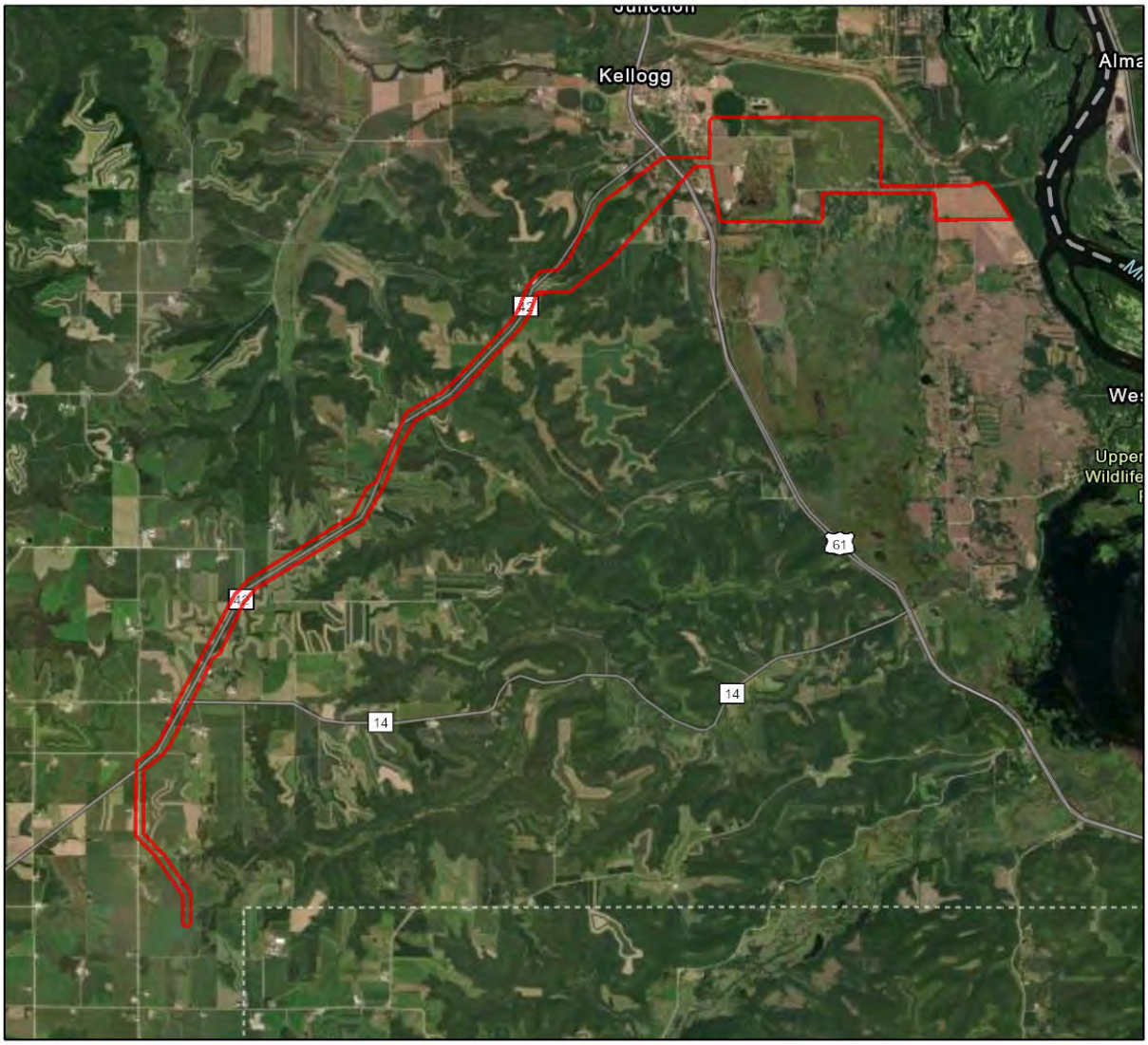
AUTOMATED RESULTS: FURTHER REVIEW IS NEEDED
As requested, the above project has undergone an automated review for potential impacts to rare features. Based on this review, one or more rare features may be impacted by the proposed project and further review by the Natural Heritage Review Team is needed. You will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

Please refer to the table on the cover page of this report for a summary of potential impacts to rare features. For additional information or planning purposes, use the Explore Page in Minnesota Conservation Explorer to view the potentially impacted rare features or to create a Conservation Planning Report for the proposed project.

If you have additional information to help resolve the potential impacts listed in the summary results, please attach related project documentation in the Edit Details tab of the Project page. Relevant information includes, but is not limited to, additional project details, completed habitat assessments, or survey results. This additional information will be considered during the project review.

Dairyland Wabasha Relocation Project

Aerial Imagery With Locator Map



N
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0 0.5 1 2 3 4 Miles

Project Boundary

Project Type: Utilities, Transmission (electric, cable, phone)

Project Size (acres): 2,015.39

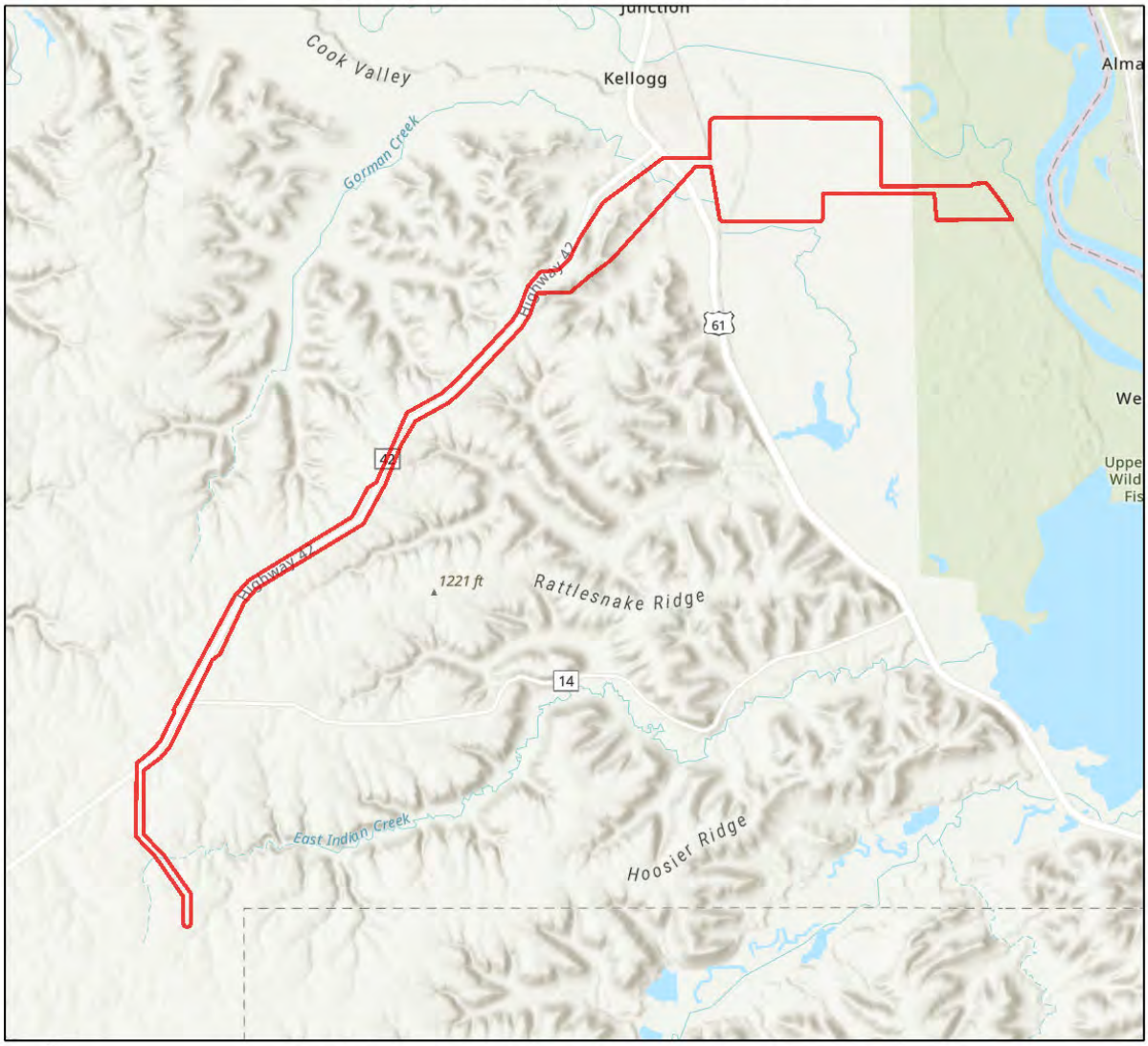
County(s): Wabasha

TRS: T108 R11 S1, T109 R10 S18, T109 R10 S4, T109 R10 S5, T109 R10 S7 +

Earthstar Geographics
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA

Dairyland Wabasha Relocation Project

USA Topo Basemap With Locator Map



N
W E
S

0 0.5 1 2 3 4 Miles

Project Boundary

Project Type: Utilities, Transmission (electric, cable, phone)

Project Size (acres): 2,015.39

County(s): Wabasha

TRS: T108 R11 S1, T109 R10 S18, T109 R10 S4, T109 R10 S5, T109 R10 S7 +

Esri, NASA, NGA, USGS
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA

From: Britta Bergland
To: Collins, Melissa (DNR); Warzecha, Cynthia (DNR)
Cc: Sage Williams; Kristin Lenz; Vickery, Martha L (DNR)
Subject: RE: Dairyland Power - Wabasha Relocation Project in Wabasha County, MN
Date: Friday, December 22, 2023 1:43:00 PM
Attachments: image001.png image002.png image003.png image004.png image005.png

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Hi Melissa –

Thank you for your prompt response and for providing clarification on points of contact. We appreciate these early coordination comments. We have initiated review of all of these items and will reflect this information in the Certificate of Need/Route Permit application.

Please let us know if we can provide any additional information.

Take care!

Britta

Britta Bergland
612.746.3673 direct
612.220.9692 mobile
britta.bergland@merjent.com

merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Sent: Monday, December 18, 2023 4:52 PM
To: Britta Bergland <britta.bergland@merjent.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Kristin Lenz <kristin.lenz@merjent.com>; Vickery, Martha L (DNR) <martha.vickery@state.mn.us>
Subject: EXTERNAL: RE: Dairyland Power - Wabasha Relocation Project in Wabasha County, MN

Hi Britta,

Thank you for reaching out for early coordination on the Dairyland Power Wabasha Relocation Project in Wabasha County, MN. I was able to review the information that you provided, and have the following comments for your consideration as you move forward in the route permit application process:

- During early coordination, I would be your DNR point of contact. Once the route

application is submitted to the PUC, Cynthia Warzecha will become your DNR point of contact. Please continue to include her on all communication.

- It appears that the proposed route will cross DNR public water watercourse, Gorman Creek (M-033), which would require a DNR license to cross.
- The project was submitted to Minnesota Conservation Explorer on 12/13/2023, and a manual review is required due to the presence of rare features and state-listed species within the vicinity of the project area. Please reference MCE #: 2023-00935 in further correspondence regarding rare features. Natural Heritage Review staff will contact you when the final Natural Heritage Review letter is complete, and provide all recommendations and requirements for state-listed species.
- I recommend initiating coordination with the U.S. Fish and Wildlife Service regarding federally-listed species using the Information for Planning and Consultation tool, if you have not done so already.
- We appreciate that the majority of the route will follow an existing road in order to limit impacts to habitat.
- It appears that most of the project area is located within a region prone to surface karst feature development, with several karst features documented within 1,000 feet of the project area. It will be important to fully understand the geology of the project area when placing and designing pole structures. Geotechnical studies may be necessary to better understand the karst conditions within the project area in order to protect groundwater and ensure structure stability. An emergency response plan may be needed for in the event that surface karst features are encountered during construction.

Please let me know if you have any questions.

Thank you,

Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Pronouns: She/her/hers

Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5755
Email: melissa.collins@state.mn.us
mndnr.gov

From: Britta Bergland <britta.bergland@merjent.com>
Sent: Monday, December 18, 2023 12:40 PM
To: Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Kristin Lenz <kristin.lenz@merjent.com>; Vickery, Martha L (DNR) <martha.vickery@state.mn.us>
Subject: Dairyland Power - Wabasha Relocation Project in Wabasha County, MN

Dear Cynthia Warzecha and Melissa Collins:

Dairyland Power Cooperative (Dairyland) is proposing to relocate approximately 13.3 miles of 161-kilovolt (kV) high voltage transmission line and construct a new substation in Wabasha County, Minnesota (the Wabasha Relocation Project, or the Project). The Project starts in Plainview Township, northeast of the Town of Plainview, and traverses northeast through Highland, Watopa, and Greenfield Townships, ending east of the City of Kellogg near the Mississippi River. More information on the Project, along with a Project map, is available in the attached fact sheet.

Dairyland plans to file a joint Certificate of Need and Route Permit application with the Minnesota Public Utilities Commission in March 2024. Dairyland would appreciate any input you may have on the Project. Please reach out to Sage Williams with Dairyland at 608-791-2993 or Sage.Williams@Dairylandpower.com with questions, written comments, or a request for a meeting.

Thank you –

Britta Bergland [on behalf of Sage Williams, Dairyland Power Cooperative]

Britta Bergland
612.746.3673 direct
612.220.9692 mobile
britta.bergland@merjent.com

merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

Minnesota Department of Transportation

From: Kotch Egstad, Stacy (DOT)
To: Sage Williams
Cc: Kristin Lenz; Oates, Travis M
Subject: EXTERNAL: RE: Dairyland MN Wabasha County Relocation Project info
Date: Wednesday, October 25, 2023 12:50:25 PM
Attachments: ~~image001.png~~ ~~image002.png~~ ~~image003.png~~ ~~image004.png~~ ~~image005.png~~

CAUTION: This email originated from outside of Merjent.

Thank you for this, Sage.

It has been forwarded to the team.

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
O: 651-366-4635 (Thur)
mndot.gov/

DEPARTMENT OF TRANSPORTATION

From: Sage Williams <Sage.Williams@DairylandPower.com>
Sent: Wednesday, October 25, 2023 11:00 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Kristin Lenz <kristin.lenz@merjent.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>
Subject: Dairyland MN Wabasha County Relocation Project info

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hi Stacy,
Please share this information with the rest of your team on the call today.
We will be running this in the Wabasha Herald twice ahead of our open house meeting, scheduled for November 9, 2023.

Thanks again for your time.

Sage Williams
Manager – Transmission Operations and Development
Dairyland Power Cooperative
Phone: 608-791-2993
Mobile: 608-304-7416
Sage.Williams@Dairylandpower.com

"Zero By Choice - Everyone Home Safe Every Day"

Dairyland Power Cooperative
Minnesota Department of Transportation
Wabasha County Relocation Project Introduction Meeting
October 25, 2023

Participants: Stacy Kotch Egstad (MnDOT), Sage Williams (Dairyland), Travis Oates (S&L), Britta Bergland (Merjent), David Evans (MnDOT), Paul Hartzheim (MnDOT), Tracy Schnell (MnDOT), Kristin Lenz (Merjent)

Lenz provided a brief intro for the Project. The Project is a relocation of Dairyland Power Cooperatives' (Dairyland's) existing 161-kV transmission line that is currently located on the CapX structures that runs roughly from the Town of Plainville northeast toward the City of Kellogg and the Mississippi River. Xcel Energy and CapX owners are moving forward with the 2nd circuit on the CapX structures, which necessitates that Dairyland vacate the 161-kV line. Xcel Energy (Ellen Heine) has previously communicated with the MnDOT on the Xcel Energy Project. Dairyland has reviewed other potential route alternatives through the area. There is a quite a bit of state-managed and federally-managed lands to the east along the Mississippi River; based on Dairyland's initial review of potential routes, the proposed route along Highway 42 appears to be the most environmentally preferable because of the avoidance of these areas and the ability to be near a road right-of-way.

Oates provided a view of the Project alignment starting in the northeast near City of Kellogg, starting with the crossing of Highway 61, a State Scenic Byway and also part of the Great River Road. Kotch Egstad recommended contacting the Mississippi River Parkway Commission for the Highway 61 crossing sooner rather than later. Hartzheim also indicated that the MnDOT will likely request additional information for the Highway 61 crossing location, such as photo and/or video simulation of the crossing to understand visual impacts – this is more information than historically has been required. Members of the MnDOT and some state legislators are on the Mississippi River Parkway Commission.

Chris Miller, Director
MN Mississippi River Parkway Commission
56 33rd Ave S, #283
St. Cloud, MN 56301
651-341-4196
chris@togpartners.com
Welcome to MRPC Members - MRPC Members

Schnell inquired on construction timing – Williams indicated tentatively spring 2026. Schnell indicated that the Highway 61 repaving project is not currently forecasted until 2029; however, this is fluid – can change by years. No expansion projects are currently forecasted. Work was done in the last year or two at the intersection at Highway 42 and Highway 61; repaving was done in this area recently as well. No projects are currently forecasted for Highway 42 at this time; however, this could also change if issues arise.

Kotch Egstad inquired if poles would be within the road ROW at Highway 61; Oates indicated that the intent is to keep the poles outside of the ROW in this location.

MnDOT has been working on revising the Utility Early Notification Memo (ENM) form and has made some changes over the last several weeks; they are now asking for more information with tables, maps and shapefiles to better inform the review process.

Dairyland Power Cooperative
Minnesota Department of Transportation
Wabasha County Relocation Project Introduction Meeting
October 25, 2023

Hartzheim inquired on the route width/study area, in particular around the city of Kellogg and the Highway 61 crossing. Lenz indicated that the study area toward the eastern end of the Project is almost 1-mile wide due to potential County Road 84 improvements per discussions with the Wabasha County Highway Department. The U.S. Army Corps of Engineers (USACE) has also purchased several properties along County Road 84 as a disposal area for dredge from the Upper Mississippi River Pool 5. Dairyland has reached out to the USACE to schedule a meeting to further discuss. On the west side of Highway 61, there are very steep slopes on the northeast side of Highway 42. Dairyland is therefore looking to route the alignment to the southwest side of the Highway 42 in the valley. There is an existing distribution line that runs through this area farther to the south; however, the line is very close to houses and there may be some issues collocating with this smaller distribution line. Dairyland is hosting a public open house in this area on November 9, 2023 and hopes that landowners will provide additional feedback on the alignment through this area.

Lenz inquired on whether there would be a better crossing location for Highway 61; Hartzheim indicated that there is a Scenic Byway group within MnDOT Office of Environmental Stewardship that would review and comment on the crossing in response to submittal of the Utility ENM. After his cursory review of Scenic Areas polygons in the MnDOT's Environmental Landscape Mapper (ELM, http://www.dot.state.mn.us/project-development/subject-guidance/environmental-landscape-mapper/index.html), there appears to be a gap in the Scenic Area in the area where the Project is currently crossing. They recommend following existing utility crossings where feasible, and also inquiring with the Mississippi River Parkway Commission. MnDOT will be able to provide further information during their Environmental Review. MnDOT prefers that the information is provided prior to them to filing of the Minnesota Public Utilities Commission (MPUC) Route Permit application so that the info can be included in the Route Permit application. The Mississippi River Parkway Commission has periodic meetings to present information; but applicants can request individual meetings as well to understand their process.

Oates reviewed the portion of the alignment along Highway 42 which was designed to underbuild with existing distribution, maximize distances from residences, avoid placement in road ROW and to reduce the number of cross-overs. MnDOT prefers perpendicular crossings, but understands that that is not always feasible. Will request justification/rational for long angular crossings. MnDOT also prefers underbuild. Dairyland is still working through pole heights and span length details; span lengths likely be around 400-800 feet. The Project will cross over the highway to northwest side to avoid tree farm area and access.

Along Highway 42, Kotch Egstad inquired on the foundations and whether the aerial arm would be toward the highway; Oates indicated that the foundation would be outside the highway ROW with the arm and conductor blowout would likely be over road ROW. Oates inquired if that process is with the Environmental Review (Utility Review). MnDOT indicated that the long-form application would be needed for such aerial encroachments. Kotch Egstad will provide an example of the forms. Those permits would be done after the MPUC Route Permit is issued. The ENM process is to inform the MnDOT of potential routing and environmental issues to participate and comment on the MPUC process. Kotch Egstad recommended additional meetings with Dairyland throughout the regulatory and permitting process to further refine the details, permit requirements and final routing.

Dairyland Power Cooperative
Minnesota Department of Transportation
Wabasha County Relocation Project Introduction Meeting
October 25, 2023

Kotch Egstad inquired on the crossing at State Highway 42 and County Road 14; MnDOT generally prefers perpendicular at the intersections. Need to stay out of the sight corners; as long as the poles are outside of the ROW the proposed crossing should be okay. PDF maps with sight corners are here: Right of Way Mapping and Monitoring - MnDOT (state.mn.us)

Hartzheim inquired on collocating with the CapX corridor and why that is not an option. Oates indicated that the terrain is an issue along this line – the 161-kV would need to be off-set from the CapX corridor which would almost double the ROW width. There would need to be separation between the 161-kV and the two 345-kV lines for safety reasons as well. Hartzheim also inquired regarding the City of Kellogg – it appears that the line is outside of the city limits but curious if Dairyland has had any conversations with officials to understand if there are any planned expansions. Lenz indicated that letters went out to local government officials this week and Dairyland anticipates starting these conversations soon.

Hartzheim also indicated that a portion on the eastern side of the Project falls within the rusty patched bumble bee high potential zone (U.S. Fish and Wildlife Service [USFWS] federally endangered species) and inquired if Dairyland had initiated coordination with the USFWS. Lenz indicated that Dairyland hopes to further refine the study area after the open houses; once the study areas has been finalized, Dairyland will initiate the USFWS online consultation with Information for Planning and Consultation (IPaC) and the Determination Key (DKey), in addition to the Minnesota Department of Natural Resources (MDNR) state-listed Minnesota Conservation Online (MCE) review. Dairyland has reviewed the Natural Heritage Information System (NHIS) database; therefore, we have an understanding of potential occurrences. Hartzheim also pointed out that there is a designated calcareous fen about 1.5 miles from the Project area. Lenz responded this did come up in the initial sensitive resources review and Dairyland will further coordinate with the MDNR on this feature. Designated fens are protected by state law; because these fens are fed by upwelling groundwater, the MDNR are generally concerned with excavations that have the potential to affect groundwater that feeds the fen (e.g., deep foundations).

Hartzheim inquired on a project website: www.dairylandpower.com/wabasha-relocation-project.

From:	Kristin Lenz
To:	Kotch Egstad, Stacy (DOT)
Cc:	Sage Williams; Oates, Travis M; Britta Bergland
Subject:	RE: EXTERNAL: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting
Date:	Thursday, October 26, 2023 10:00:00 AM
Attachments:	DPC_MnDOT_Proj[redacted]_2023-10-25.pdf image001.png image002.png image003.png image004.png image005.png image006.png image007.png

---

Thanks Stacy and Paul,

Finalized notes are attached!

Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Thursday, October 26, 2023 8:50 AM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Britta Bergland <britta.bergland@merjent.com>
Subject: RE: EXTERNAL: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Offering up some additions/clarifications to the meeting notes you supplied. Please see attached.

Thank you.

From: Kotch Egstad, Stacy (DOT)
Sent: Wednesday, October 25, 2023 3:19 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Britta Bergland <britta.bergland@merjent.com>
Subject: RE: EXTERNAL: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Sounds great, thank you!

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Wednesday, October 25, 2023 3:00 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Britta Bergland <britta.bergland@merjent.com>
Subject: RE: EXTERNAL: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Thank you Stacy, we will save this version to our files and will work to get this filled out and over to your team as soon as possible.

I've also attached the meeting notes from today.

Thanks!
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Wednesday, October 25, 2023 12:45 PM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Tom Hillstrom (Contractor) <tom.hillstrom@merjent.com>; Britta Bergland <britta.bergland@merjent.com>
Subject: EXTERNAL: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Thank you all for the meeting today. Very helpful to know the details you've provided thus far.

I'm taking the liberty of sending you the latest and greatest version of our ENM and Supplemental Checklist to utilize for MnDOT's review of the project. Because you'd mentioned that it wouldn't be returned until late November, using this updated version (hopefully) wouldn't throw you/team off

too much.

Please reach out with any questions you may have on the documents.

Thank you,

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
O: 651-366-4635 (Thur)
mndot.gov/

From: Kotch Egstad, Stacy (DOT)
Sent: Monday, October 2, 2023 7:40 AM
To: Kristin Lenz <kristin.lenz@merjent.com>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Tom Hillstrom (Contractor) <tom.hillstrom@merjent.com>
Subject: RE: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Good Morning Kristin,

We very much welcome an introduction meeting on this project. From the description, it seems that besides permitting and environmental Central Office staff, only MnDOT District 6 staff would need to be added to the invite. If you'd like to propose 2-3 dates/times, I will work to make one possible on my end.

As you may know, MnDOT has begun implementing the attached Early Notification Memo (ENM) process to be utilized for agency review of MPUC projects. Please note that it is understood that all requested information may not be available at this time, but please provide what you can. This does not have to be completed before our meeting, but to be respectful of your PUC submittal timeline, please allow MnDOT 30 days for a complete agency review of the information you provide. However, it would be appreciated if you could provide some form of mapping/sketches, for reference, before our meeting.

This ENM document/process is a work in progress and therefore, future ENM requests may look different than what you see today.

Please contact me with any questions on the document.

Thank you for your early coordination outreach on this project,

Stacy Kotch Egstad
Utility Routing & Siting Coordinator | Office of Land Management
Minnesota Department of Transportation
395 John Ireland Blvd Mailstop 678
St. Paul, MN. 55155
O: 651-366-4635
mndot.gov/

From: Kristin Lenz <kristin.lenz@merjent.com>
Sent: Thursday, September 28, 2023 1:49 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Sage Williams <Sage.Williams@DairylandPower.com>; Oates, Travis M <travis.m.oates@sargentlundy.com>; Tom Hillstrom (Contractor) <tom.hillstrom@merjent.com>
Subject: Dairyland Power 161-kV Transmission Line Relocation Project, Wabasha County, MN - Request for Pre-Application Meeting

Good afternoon Stacy,

Dairyland Power Cooperative (Dairyland) is proposing to relocate approximately 14 miles of 161-kilovolt (kV) high voltage transmission line (HVTL) and construct a new substation in Wabasha County, Minnesota (Project). The Project starts in Plainview Township, northeast of the Town of Plainview, and traverses northeast through Highland, Watopa, and Greenfield Townships, ending east of the City of Kellogg near the Mississippi River. The Proposed Route would primarily follow State Highway 42 and would also involve a crossing of State Highway 61 (Great River Road, Designated Scenic Byway) southwest of Kellogg.

The Project is a reroute of approximately 10.4 miles of the existing Dairyland LQ34 161-kV transmission line located on the existing CapX2020 Hampton-Rochester-LaCrosse 345-kV structures. In July 2020, the Midwest Independent System Operator (MISO) approved a long-range transmission portfolio including a new Wilmarth-North Rochester-Tremval transmission line. This new 345-kV line would utilize the double circuit capability of the CapX2020 system between North Rochester and Alma, Wisconsin. Therefore, Dairyland's existing 161-kV circuit must be removed and relocated to make room for a new, second 345-kV circuit on the existing CapX2020 structures.

Dairyland is currently gathering information in preparation for filing its route permit application with the Minnesota Public Utilities Commission (Commission), which it plans to submit in early Winter

2024.

Dairyland would appreciate any input the MnDOT may have on the Project and the proposed route and would like to propose a pre-application meeting to introduce the Project and review the initial route with your team. Would there be a good time for your team in the next few weeks?

Let us know what works best for you.

Thank you,
Kristin

Kristin Lenz
Senior Project Manager
612.924.3962 direct
763.913.4740 mobile
kristin.lenz@merjent.com

merjent.
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

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From: Britta Bergland
Sent: Thursday, March 14, 2024 12:24 PM
To: stacy.kotch@state.mn.us
Cc: Sage Williams; Kristin Lenz; Angie Ronayne
Subject: DPC - Wabasha Relocation Project Utility ENM Submittal
Attachments: 1_DPC_Wabasha Relocation Project_MnDOT_ENM_20240314.pdf; DPC_Wabasha_Relocation_Project_Data_20231213.zip; Att B_DPC_GIS Data Tables_2040314.zip

Hello Stacy,

On behalf of Dairyland Power Cooperative, please find the completed Utility Early Notification Memo form and supplemental information for the Wabasha Relocation Project in Wabasha County, Minnesota. The submittal materials include four parts:

- Cover Letter and ENM Form (attached)
- Supplemental Information package with attachments A, C, D, and E, available to download from Adobe Cloud due to file size: https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:5a001ca9-826a-483c-99d3-4fff01252d91
    - Attachment B – Project shapefiles and kmzs (attached)
    - Attachment B – GIS data tables (attached)

Please reach out if you have any questions as you complete your review. Dairyland intends to file its joint Certificate of Need/Route Permit application to the Minnesota Public Utilities Commission at the end of March 2024.

Thank you!

Britta

Britta Bergland
612.746.3673 direct
612.472.0329 mobile
britta.bergland@merjent.com

merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660
www.merjent.com

DAIRYLAND POWER
COOPERATIVE

March 14, 2024

Stacy Kotch Egstad
Utility Routing & Siting Coordinator
Minnesota Department of Transportation
395 John Ireland Blvd.
Mailstop 678
St. Paul, MN 55155
stacy.kotch@state.mn.us

Re: **In the Matter of the Application of Dairyland Power Cooperative to Relocate an Existing 161-kV Transmission Line in Wabasha County, Minnesota**
MPUC Docket Nos. ET3/CN-23-504 and ET3/TL23-388

Dear Stacy Kotch Egstad:

Dairyland Power Cooperative (Dairyland) is proposing to relocate approximately 13.3 miles of 161-kilovolt high voltage transmission line and construct a new substation in Wabasha County, Minnesota (the Project). The Project starts in Plainview Township, northeast of the Town of Plainview, and traverses northeast through Highland, Watopa, and Greenfield Townships, ending east of the City of Kellogg near the Mississippi River.

Dairyland plans to file a joint Certificate of Need and Route Permit application (Application) with the Minnesota Public Utilities Commission (Commission) in March 2024. As requested by Minnesota Department of Transportation (MnDOT) staff, Dairyland is submitting the enclosed Utility Early Notification Memo form and supplemental information prior to submitting its Application to the Commission so that MnDOT staff may conduct an initial review of the Project.

Please contact me at 608-791-2993 or Sage.Williams@Dairylandpower.com if you have any questions or require additional information.

Sincerely,

DAIRYLAND POWER COOPERATIVE

Sage Williams
Manager, Transmission Operations and Development

Encl: Early Notification Memo Form and Supplemental Information

Minnesota Department of Transportation

APPLICANTS: PLEASE RETURN A COMPLETED COPY OF THIS FORM, APPLICANT CHECKLIST, AND SUPPLEMENTAL INFORMATION TO THE MnDOT OFFICE OF LAND MANAGEMENT (OLM) MANAGER.

Click the checkboxes in left column if your project meets thresholds (click heading link for thresholds). By default, MnDOT's Cultural Resources Unit, Environmental Assessment Unit, Protected Species Review Team, Blowing Snow Control, and District staff will be notified of all Utility ENMs.

	Resource/Area of Concern
☒	Contaminated Materials Management
☒	Regulated Waste and Storage Tanks
☒	Vegetation Review and Survey
☒	Wetlands Coordination
☒	Water Permits—Federal Agencies, Floodplains
☐	Historic Roadside Properties Program
☒	Construction Stormwater and Erosion/Sediment Control
☐	Safety Rest Area Program
☒	Scenic Byways
☒	Railroad
☐	Airport Influence Areamailto:aviationplanning.dot@state.mn.us
☐	Operations
☐	Design Support
☐	Safety and Operations Management
X	Blowing Snow Control / Snow Fencing
X	Cultural Resources CulturalResources.dot@state.mn.us
X	OES Environmental Assessment Unit / Environmental Review
X	Protected Species Program
X	District Planners To be completed by MnDOT

Request for information and early coordination from MnDOT functional groups

The OLM is providing early notification of the proposed utility project described in the subject line of this ENM and is requesting your review of the project. Project information available at this time may be limited, therefore, we recognize that responses are preliminary and may change after reviewing other documents and/or if project details change. However, your early input will help assure that all environmental concerns and interests considered in the development of this project.

Project Description

Utility applicants/ENM Writer: Provide a plain language narrative description of the utility project location and the nature of the proposed work. Include the following project information below, if known:

- Type of utility
  - High voltage transmission lines
    - pole height: **See Section 2.1 of Supplement**
    - spacing: **See Section 2.1 of Supplement**
    - voltage: **161-kV**

- Mileage (total and collocated) **See Section 2 of Supplement**

- Typical temporary workspace dimensions and depth of excavations **See Section 2 of Supplement and Figure 2-2**

- Typical permanent easement dimensions **See Section 2 of Supplement and Figure 2-2**

- Number and locations of state Trunk Highways crossed and/or miles of proposed collocation **See Section 2.3 of Supplement**
  - Identify any Scenic Byways within 7 miles of the project **See Section 2.4 and Appendix C5 of Supplement**

- General project schedule (if known) **See Section 2.2 of Supplement**

Powerlines – is there a potential to locate poles/infrastructure within MnDOT ROW? **Yes, See Sections 2.3, 3, and 3.1 of Supplement**

Provide shapefiles, corresponding maps/datasets, and all other information identified in the enclosed *Utility ENM – Supplemental Information Checklist* form. Please return this completed checklist along with this Utility ENM form. Note that you may need to provide some of the Supplement in a stand-alone document. **See Section 1.1 of Supplement**

General Project Information:

District(s): **6**	
County(ies): **Wabasha**	City(ies): **Near Kellogg**
Planned Construction Dates: **See Section 2.1 of the Supplement**	
Location and Reference Points: Refer to enclosed maps/shapefiles for location of MnDOT Trunk Highway crossings/paralleling. **See Section 2.3 and Appendices B and C of the Supplement**	
Project Phase: ☒ Pre-Filing (PUC) ☐ Post-Filing (PUC) ☐ MnDOT Permitting Phase ☐ Post-Construction Monitoring and Maintenance Additional Comments (Docket number, public comment/notice number/date, etc.): **ET3/CN-23-504 and ET3/TL-23-388**	
Tribal Lands: Is any part of project within a reservation or tribal trust land outside of reservation boundaries? ☐ Yes ☒ No If yes, list name of reservation: _____ Has the tribe(s) been made aware of the proposed project? ☒ Yes ☐ No ☐ Unknown **See Sections 4 and 13 of the Supplement**	

Current Land Use(s):	
Recreational Resources:	
☒	There are parks, trails, wildlife refuges, state water trails, and/or recreation areas in the project vicinity.
	If checked above, will this project have impacts on these parks, trails, refuges, and/or recreation area? ☒ Yes ☐ No ☐ Unknown If yes, provide additional details: **See Section 5 of the Supplement**
Environmental Justice	
☒	There are manufactured home parks, apartment buildings, or other identifiable minority or low-income populations in the project vicinity.
	If checked above, will this project have any impacts [direct or indirect (e.g., noise)] on any manufactured home parks, apartment buildings, and/or other identifiable minority or low-income populations? ☐ Yes ☒ No ☐ Unknown **See Section 6 of the Supplement**
	If checked, please describe what measures are proposed to mitigate impacts to environmental justice communities: **No mitigation required as no environmental justice communities were identified; see Section 6 of the Supplement**

Additional information, by subject area:

Contaminated Material	
☒	Project includes grading, excavation within MnDOT ROW. Details: **See Sections 3 and 7 of the Supplement**
☒	Project includes access and/or travel across MnDOT ROW Details: **See Sections 3 and 7 of the Supplement**
☒	Project is in or near a commercial/industrial area. **See Section 7.1 of the Supplement**
☒	Project may require groundwater dewatering. Details: **See Section 7.2 of the Supplement**
☒	Applicant has information that indicates potentially contaminated sites are located along the corridor (e.g., filling stations, dumps, manufacturing, scrap yards, dry cleaners, etc.) **See Section 7.3 and Appendix C3 of the Supplement**
Other pertinent information regarding contaminated material: _____	

Regulated Waste and Storage Tanks	
☐	Project will include building demolition or relocation. **See Section 8 of the Supplement**
☐	Project will include acquisition of property with above ground discarded regulated materials or waste.
☐	Project will produce waste that cannot be turned over to construction contractor as excess material (examples: hazardous waste, sandblasting waste, asbestos containing material)
Other pertinent information regarding regulated waste and storage tanks: _____	

Vegetation (Map[1] vegetation of interest along roadsides)	
☐	Project may occur along Trunk Highways in the specific locations below: • Highway 2 (Reference post 35-37 and 42-48) • Highway 32 (Reference post 35-37, 49-52, 55-58, and 70-74) • Highway 71 (Reference post 81-83) • Highway 56 (Reference post 8-16) • Highway 102 (Reference post 2-6) • Highway 218 (Reference post 20-44)
☒	Project may include soil disturbance within MnDOT right-of-way **See Sections 2.3, 3, and 9.1 and Appendix C4 of the Supplement**
☒	Project may include soil disturbance under canopy of existing woody vegetation within or near MnDOT right-of-way **See Sections 2.3, 3, and 9.1 of the Supplement**
☒	Project is located within an area of known sensitive or protected vegetation identified through the Minnesota Conservation Explorer Planning Tool (within one or more of the following data sets): **See Section 9.2 of the Supplement** • Minnesota DNR Native Plant Community • Minnesota Biological Survey (MBS) Railroad Rights-of-Way Prairies • MBS Site of Biodiversity Significance
☒	Project is located within an area of known high priority weed infestation (data available through EDDMapS.org) **See Section 9.3 of the Supplement**
☒	Project may require staging or access within MnDOT right-of-way **See Sections 2.3, 3, and 9.4 of the Supplement**
Other pertinent information regarding vegetation: **Dairyland's Vegetation Management Plan is included as Appendix E of the Supplement** _____	

[1] Google Earth .kmz; only available to MnDOT staff.

Wetlands and Waterbodies	
☒	A level 1 wetland/aquatic resource delineation (i.e., mapping exercise using NWI, aerial photography and other off-site methods) has been conducted within the project limits. **See Section 10 and Appendix C2 of the Supplement**
	☒ Based on the level 1 wetland delineation, there are wetlands within the project limits. Details: **See Section 10 and Appendix C2 of the Supplement**
	Does the project have the potential to temporarily impact wetlands? ☒ Yes ☐ No ☐ Unknown Does the project have the potential to permanently impact wetlands (e.g., fill or type conversion)? ☒ Yes ☐ No ☐ Unknown Details: **See Sections 3 and 10, and Appendix C2 of the Supplement**
Other pertinent information regarding wetlands and waterbodies:	

Wetland and Waterbody Permits—Federal Agencies	
☒	US Army Corps of Engineers Section 404 permit may be needed. **See Section 10.1 of the Supplement** If checked, the project may qualify for: ☒ Regional General Permit ☐ Individual Permit ☐ Unknown
☐	US Army Corps of Engineers Section 10 (navigable waters) permit may be needed.
☐	US Coast Guard coordination and/or permit may be needed (navigable waters).
Other pertinent information regarding wetland and waterbody permitting: **USACE interests; see Section 10.1 of the Supplement**	

Floodplains	
☒	The project may impact 100-year floodplains. (see FEMA Maps) Details: **See Section 11**
	☒ If yes, will the project involve any work below or immediately adjacent to the 100-year floodplain elevation? **See Section 11** ☐ If yes, will any aboveground structures or impervious surfaces be located within the floodplain? **No**
Other pertinent information regarding floodplains:	

Historic Roadside Properties Program	
☐	Project is near or adjacent to known historic roadside properties on MnDOT right of way. Known properties are listed by District, Trunk Highway, Reference Point and Historic Name (of property) in the Historic Roadside Properties on Minnesota Trunk Highways.
☐	Project is near or adjacent to structures/elements in the MnDOT right of way older than fifty years but is not included on list above. Structures/elements include historic walls, historic markers, objects, overlooks, buildings, etc.
Other pertinent information regarding Historic Roadside Properties Program:	

Construction Stormwater and Erosion/Sediment Control	
☒	Will the project disturb greater than 1 acre of land and require coverage under MCPA General Permit MNR100001? **Yes**
☐	Will the project disturb (excavation, grading, stockpiling, equipment traffic, compaction) at least 5 acres of MnDOT ROW? **See Sections 2.3 and 12 of the Supplement**
☐	Will the project result in discharges to special or impaired waters (refer to MNR100001 for examples)? **No; see Section 12 of the Supplement**
☒	Will the project disturb slopes steeper than 2.5:1 and ditch gradients greater than 5%? **See Sections 9.1 and 12 of the Supplement**
Other pertinent information regarding Construction Stormwater and Erosion/Sediment Control:	

Safety Rest Area Program	
☐	Project may directly or indirectly impact an existing rest area (rest area locations), travel information center, wayside, or scenic overlook. This includes temporary closures and disruptions in access to rest area of more than 48 hours.
Other pertinent information regarding Safety Rest Areas:	

Scenic Byways	
☒	Project is within 7 miles of a Scenic Byway (maps: Enterprise MnDOT Mapping Application [EMMA], Right of Way Mapping and Monitoring [ROWMM]). If yes, list the Scenic Byway(s) and provide the nearest distance: **U.S. Highway 61; see Section 2.4 of the Supplement and Appendix C5** Height of tallest project structure: **Transmission pole; see Section 2.1 of the Supplement**
Other pertinent information regarding Scenic Byways:	

Railroad Coordination and Railroad Agreement See map for Rail Safety and Coordination Project Managers	
☒	Construction activity is expected within 50 feet of the centerline of an individual pair of railroad (RR) tracks
☒	Project limits are estimated to be within 600 feet of any RR tracks
☐	Project involves a detour that directs traffic across a RR grade crossing
Other pertinent information regarding Railroads: **Section 2 and Appendix C1 of the Supplement**	

Airport Influence Area	
☐	Project is within five (5) miles of an airport. (For Airport locations see Airport Influence Maps, but use the 5-mile criterion, not the influence area). If yes, provide name of airport, and distance/direction from project:
Other pertinent information regarding Airports:	

Cultural Resources (Historic Properties and Tribal Consultation) Review
Provide narrative summary of relevant information regarding cultural resources, surveys, and agency consultation (*e.g., summary of archaeology, architecture/historic properties surveys to date, status of consultation with the State Historic Preservation Office (SHPO), Minnesota Indian Affairs Council (MIAC), Office of the State Archaeologist (OSA), Tribal partners, etc.)*: See Section X of the Supplement. **See Section 13 of the Supplement**

Protected Species Program Review -- All Actions – Send ENM to OES protected species program.	
☒	Project has a federal nexus (e.g., federal permitting, funding, or crosses federal property). If so, list federal agencies: **USACE; see Section 10.1 of the Supplement**
☐	The project bisects or borders federally-designated critical habitat for threatened and/or endangered species. For more info. see, https://gis-fws.opendata.arcgis.com/maps/794de45b9d774d21aed3bf9b5313ee24/about **No federally designated critical habitat is present within the Proposed Route.**
☒	Project occurs within or adjacent (within 0.5 miles) to a bumble bee High Potential Zone. See: https://www.arcgis.com/home/item.html?id=2716d871f88042a2a56b8001a1f1acae **See Section 14.2 of the Supplement**
☒	The project may involve tree clearing on or near MnDOT ROW. ☒ Yes ☐ No ☐ Unknown Estimated quantity of tree clearing**: 0.75 acres** For tree clearing timing requirements, please see Technical Memorandum No. 22-05-ENV-01 May 11, 2022.[2] **See Sections 2.3, 3 and 14.3 of the Supplement**
Please provide other pertinent information regarding protected species (e.g., summary of agency consultations with USFWS/DNR, natural resource site assessments, endangered species survey reports, NHIS or IPaC reviews, etc.): **See Sections 9.2 and 14, and Appendix D of the Supplement**	

NOTE TO MnDOT REVIEWERS: SEE SUPPLEMENTAL MAPS AND INFORMATION REFERENCED IN THESE RESPONSES

[2] Technical Memo is in the process of being amended and link to be updated.

DAIRYLAND POWER COOPERATIVE

SUPPLEMENTAL INFORMATION FOR A UTILTY ENM
MINNESOTA DEPARTMENT OF TRANSPORTATION

WABASHA RELOCATION PROJECT

March 14, 2024

DAIRYLAND POWER
COOPERATIVE
A Touchstone Energy® Cooperative

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FIGURES AND DIAGRAMS

APPENDICES

TABLES

1 INTRODUCTION

Dairyland Power Cooperative (Dairyland) will apply to the Minnesota Public Utilities Commission (Commission) for a Certificate of Need and Route Permit to relocate approximately 13.3 miles of 161-kilovolt (kV) high voltage transmission line (HVTL) and construct a new substation (the Wabasha Relocation Project, or the Project).

Dairyland met with Minnesota Department of Transportation (MnDOT) staff in October 2023 to present the Project. MnDOT staff requested that Dairyland complete its Utility Early Notification Memo (ENM) form and submit it prior to submitting its application for a Certificate of Need and Route Permit so that MnDOT staff may conduct an initial review of the Project.

1.1 MnDOT ENM Review Requirements

The Utility ENM and Utility ENM Supplemental Information Checklist present the ENM review requirements. If a box is checked on either the form or checklist, additional information is included in this supplemental information package (Supplement). The Utility ENM Supplemental Information Checklist is presented as **Appendix A. Table 1-1** summarizes Utility ENM Supplemental Information Checklist requirements that are Applicable to the Project and where they are covered in this submittal.

Table 1-1. Utility ENM Supplemental Information Checklist Requirements Applicable to the Project

Supplemental Information Checklist	Location in Supplement
Shapefiles and .kml/.kmz's displaying the following Project features (include associated metadata and date of last project/route revision).	**Appendix B1**
Overview map (.pdf format) displaying Project centerline and alternatives (if applicable) with MnDOT Trunk Highways and major features identified. Display full project on one page.	**Figure 2-1 and Appendix C1**
Detailed (zoomed in maps, aerial background, .pdf format) displaying Project details with MnDOT's Trunk Highways identified. Provide a separate map for each Trunk Highway crossing location /collocated segment	Water Resources and Hydrology – **Appendix C2** Potential Contaminated Sites – **Appendix C3** SSURGO Soils Data – **Appendix C4** Scenic Byways – **Appendix C5**
Summary table(s) (Excel format) of publicly available GIS data displayed on the detailed maps	Water Resources and Hydrology – **Table 10-1 and Appendix B1** Potential Contaminated Sites – **Table 7-1 and Appendix B1** SSURGO Soils Data – **Table 9-1 and Appendix B1** Scenic Byways – **Section 2.4**
Reference list of sources of desktop GIS data displayed on maps. Include URL and date of last download.	**Appendix B2**
Temporary workspace and permanent easement typical drawings (greenfield and collocated segments, as applicable). Include typical workspace configurations for road crossings, as applicable	**Section 2**
Known occurrences of state- or county-listed noxious weeds (see EDDMapS) in the vicinity of the project.	**Section 9.3**

Supplemental Information Checklist	Location in Supplement
Narrative summary of environmental field surveys done to date: Geotechnical, Geophysical, and Karst	**Section 3.1**
Summary of agency consultations/ communications/ public engagement done to date.	**Section 4**
Is permanent infrastructure expected to be installed within MnDOT's ROW? If so, provide details.	**Pending; Sections 3 and 3.1**
Is travel across/along MnDOT's ROW anticipated? If so, provide details and anticipated Best Management Practices to be used (e.g., timber matting, erosion/sediment controls, etc.). Describe if any proposed access locations will be permanent or temporary.	**Yes; Sections 3 and 3.1**
Project Schedule/Major Milestones (Minnesota Public Utilities Commission filing, construction/ restoration, in-service date, etc.)	**Sections 2 and 2.1**
Vegetation Management Plans	**Appendix E**
Powerlines: Utility pole typical drawings (if collocated, include drawings of proposed poles in relation to existing)	**Section 2.1; Figures 2-3 and 2-4**

2 PROJECT DESCRIPTION

The Project will begin in the vicinity of Structure X-Q3-75 on the existing Dairyland LQ34 161-kV transmission line (the Wabaco-Alma transmission line or LQ34 line) near the Town of Plainview, Minnesota in Wabasha County. This structure will be removed as part of the Project and will be replaced with the starting structure for the new 161-kV line. After travelling 13.3 miles northeast and then east, it will tie directly into a new 4-acre 161-/69-kV substation located within a larger 10.8-acre site, which is proposed to be located off County Road 84, west of the Mississippi River and southeast of the City of Kellogg (Kellogg Substation). The Project is a relocation of approximately 10.4 miles of Dairyland's existing LQ34 line, which presently connects to the Wabaco Substation (located approximately 2 miles south of the Town of Plainview) and to the Alma Substation (located on the east side of the Mississippi River in Wisconsin). The Project starts in Plainview Township, northeast of the Town of Plainview, and traverses northeast through Highland, Watopa, and Greenfield Townships, ending east of the City of Kellogg in Wabasha County, Minnesota near the Mississippi River. The Project is shown on **Figure 2-1** and on the MnDOT Overview Map (see **Appendix C1)**.

Dairyland will use single-pole steel structures. Special horizontally configured structures (H-frame or 3 pole structures) may be required to cross under any higher voltage circuits in the corridor. All structures will be self-supporting; therefore, no guying will be required. Typical pole heights will range from 75 to 140 feet above ground and spans between poles will range from 300 to 1,000 feet (see **Section 2.1**).

Construction will occur within a 100-foot-wide right-of-way (ROW) easement that Dairyland will obtain to operate the transmission line. The 100-foot-wide ROW easement is centered on the Proposed Alignment (or 50 feet on either side of the transmission line). The term Proposed Alignment is used to refer to the location of the transmission line and structures. A typical Proposed Alignment ROW is presented as **Figure 2-2**.

Additional temporary workspace (ATWS) beyond the 100-foot-wide ROW may be required at certain locations, such as road or railroad intersections, utility crossings, along steep slopes, and at stringing locations. In addition, there will be temporary staging of materials such as structures and hardware along the ROW prior to construction installation.

The Project Route Width (or, Proposed Route) is a larger area that is inclusive of the Proposed Alignment and the Kellogg Substation. Dairyland intends to request a standard Route Width of 400 feet (200 feet on either side of the Proposed Alignment for most of the Project). Dairyland is requesting a wider Route Width in some areas, up to 2,300 feet wide, to allow for additional route study and the potential need to make minor modifications to the Proposed Alignment in these areas. The Proposed Alignment, Route Width, and Kellogg Substation are shown on **Figure 2-1** and **Appendix C1**.

The Project will not be constructed within existing utility ROW; however, it will be collocated with existing utility, road, and railroad ROW for approximately 9.5 miles, or 71% of the Proposed Alignment.

Railroad Coordination

The Proposed Alignment will cross Highway 61/the Great River Road and the Canadian Pacific Railroad, and then turn south on the east side of the railroad at milepost (MP) 10.1. It will parallel the railroad for approximately 0.5 mile before turning east, then north and east again, to follow the south side of County Road 84 (see **Figure 2-1** and **Appendix C1**). Dairyland will coordinate closely with Chris Rice (Rail Safety and Coordination Project Manager for District 6) on this railroad crossing and collocation.

2.1 Structure and Design Considerations

Potential transmission structure designs and photographs are provided in **Figures 2-3** and **2-4**. Structure dimensions are provided in **Table 2-1**.

Table 2-1. Typical 161-kV Structure Dimensions

Structure Type	Material	Approximate Height Above Ground (feet)	Structure Base Diameter (inches)	Span Between Distances (feet)

Monopole with davit arms and suspension insulators	Steel	80 - 140	31 - 51	300 - 1,000
Monopole with strain attachments directly to pole	Steel	75 - 110	35 - 55	300 - 1,000

2.2 Project Schedule

Dairyland anticipates conducting site preparation activities at the Kellogg Substation site between June and July 2026. Then, Dairyland would build the Kellogg Substation and 161-kV transmission line between June 2027 – July 2028.

2.3 MnDOT Highways within the Project Area

The Proposed Route will parallel and/or intersect State Highway 42 and U.S. Highway 61 / Great River Road (Scenic Byway) as presented in **Table 2-2**. The Proposed Route is collocated with MnDOT trunk highways for approximately 8.1 miles (this conservative estimate extends the collocation along Highway 42 near Kellogg to U.S. Highway 61).

Table 2-2. MnDOT Trunk Highways within the Project Area

Highway / Road Name	Jurisdiction	Parallel / Intersects	Traffic Volumes (AADT / 2023) [1]
State Highway 42	State	Parallel/Intersect	Not Available
U.S. Highway 61 / Great River Road (Scenic Byway)	State/U.S.	Intersect	4,241 (Seq. 5984)

Dairyland met with MnDOT in October 2023 to present the Project. The MnDOT indicated that the agency plans to repave U.S. Highway 61 in 2029; otherwise, no highway expansion projects are currently planned in the Project area. MnDOT recently completed work at the intersection of State Highway 42 and U.S. Highway 61; repaving was done in this area recently as well. No projects are currently forecasted for State Highway 42 at this time. Dairyland and MnDOT staff also discussed crossing angles, footings, sight corners, and other technical issues.

Temporary access for construction of the transmission line would be along the transmission line ROW. Temporary and infrequent traffic impacts associated with equipment/material delivery and worker transportation will occur. Stringing the conductors and shield wire across roads can be accomplished with minimal traffic impacts. Typically, a pulling rope is simply carried across the road, which is then pulled overhead. Temporary structures may be installed inside or outside of road ROW to ensure pulling lines, shield wire, or conductors to have sufficient clearance over roads. Dairyland will work with the MnDOT through its application process for a Utility Accommodation Permit in MnDOT ROW and comply with all permit conditions.

When appropriate, pilot vehicles will accompany the movement of heavy equipment. Traffic control barriers and warning devices will be used when appropriate. All necessary provisions will be made to conform to safety requirements for maintaining the flow of public traffic. Construction

[1] Traffic Mapping Application (arcgis.com)

operations will be conducted to offer the least possible obstruction and inconvenience to the traveling public. Dairyland will plan and execute delivery of heavy equipment in coordination with the appropriate road authorities and in a manner that would avoid traffic congestion and reduce likelihood of dangerous situations along local roadways.

2.4 Scenic Byway

The Project Crosses U.S. Highway 61 at MP 9.7 (see **Appendices C1 and C5**), which is part of the Great River Road, a National Scenic Byway. The Great River Road is a network of roads that follow the Mississippi River through ten states that promote exploration and interpretation of the Mississippi River. The Great River Road in Minnesota is overseen by the Minnesota Mississippi River Parkway Commission (MRPC), whose mission is to "preserve, promote and enhance the scenic, historic and recreational resources of the Mississippi River, to foster economic growth in the corridor and to develop the national, scenic and historic byway known as the Great River Road."[2] The MRPC's work is organized and guided under Minnesota Statute 161.1419 and managed under the umbrella of the Legislative Coordinating Commission, and is guided by a Corridor Management Plan[3] with support from MnDOT under Minnesota Statute 161.142. National Scenic Byway designation does not confer land use regulation or permitting authority, but through the Corridor Management Plan, there is encouragement to safeguard the road's scenic qualities.

It would not be possible to construct the Project without crossing the Great River Road in some location. The existing CapX2020 system which presently carries the Dairyland 161-kV line crosses the Great River Road about 1.9 miles south of the proposed Project crossing. Therefore, Dairyland met with the MRPC, as well as MnDOT, early in Project planning to discuss the Proposed crossing location.

Dairyland presented the Project to the MRPC in November 2023 and held a meeting in December 2023 where Dairyland reviewed the proposed crossing of U.S. Highway 61. Dairyland selected this crossing location as to avoid the steep topography on the west side along State Highway 42, and to consider properties owned by the U.S. Army Corps of Engineers (USACE) (see **Section 10.1**) as well as in consideration of the Wabasha County Highway Department's future improvement plans for County Road 84.

The MRPC offered several suggestions on the crossing, including the following:

- minimize the tree clearing on both sides and/or try to site the poles behind the treed areas to screen the structures as much as possible;
- use a perpendicular crossing rather than paralleling the roadway;
- set back the poles as far as possible, to the extent practicable;
- choose a color of poles that blends into the landscape; and
- provide visual simulations of before and after the crossing.

[2] https://www.mnmississippiriver.com/about-us/

[3] https://www.mnmississippiriver.com/about-us/management-plan/

Later in December 2023, Dairyland reached out to MRPC to advise of a change in the Project alignment approximately 0.4 mile east of the U.S. Highway 61 crossing. This change was driven by subsequent meetings with the USACE regarding their interests along County Road 84. The new Project Alignment, presented in this Application, now parallels the Canadian Pacific Railroad on the eastern side, away from U.S. Highway 61. In between the Proposed Alignment and U.S. Highway 61 are numerous wooded areas, a tree line, the railroad, and various buildings and structures, including a solar field.

Dairyland has also met with MnDOT regarding the U.S. Highway 61 crossing. MnDOT advised that Dairyland coordinate with MRPC; in addition, MnDOT noted that there is a scenic byway group within MnDOT that will review and advise on the U.S. Highway 61 crossing. After MnDOT's initial review of the crossing location in MnDOT's Environmental Landscape Mapper[4], there is a gap in the Scenic Area in the area where the Project is currently crossing. Additionally, this property was determined Not Eligible for listing on the National Register of Historic Places (NRHP) in 2018. U.S. Highway 61 is a designated Scenic Byway. Dairyland has prepared a visualization of the U.S. Highway 61 crossing. Visualization images are presented in **Figures 2-5 through 2-7.**

Because the Project will replace existing Northern States Power Company (dba Xcel Energy) and People's Energy Cooperative distribution lines for 5.1 miles and will otherwise largely be collocated with existing road and railroad ROW, aesthetic impacts in most areas along the Project Alignment are anticipated to be minimal. The existing distribution lines have been in place for decades, as the area has developed. Visual impacts might be perceived by a viewer as less because the existing distribution lines will be buried by the owner of those facilities and there will be fewer structures. The new transmission line structures will be 20 to 30 feet taller with larger insulators, which might increase the visual impacts perceived by a viewer.

Where trees need to be cleared, this change to the landscape is typically a noticeable visual impact to receptors. The Proposed Alignment south of County Road 84 was designed in part to minimize the amount of tree clearing, which helps to minimize visual impacts. No trees will be cleared as part of the Kellogg Substation and the substation will not be visible from the Zumbro or Mississippi Rivers. Substation structure heights will range from 45 to 75 feet above ground. Dairyland will work with landowners to identify concerns related to the transmission line and aesthetics. In general, mitigation includes enhancing positive effects as well as minimizing or eliminating negative effects. Potential mitigation measures include:

- Location of structures, ROW, and other disturbed areas will be determined by considering input from landowners to minimize visual impacts.
- Care shall be used to preserve the natural landscape. Construction and operation shall be conducted to prevent any unnecessary destruction, scarring, or defacing of the natural surroundings in the vicinity of the work.
- Landowners may be compensated for the removal of trees and vegetation based on easement negotiations.

[4] http://www.dot.state.mn.us/project-development/subject-guidance/environmental-landscapemapper/index.html

- Structures will be placed at the maximum feasible distance from water crossings, within limits of structure design and applicable regulations.

Regarding the U.S. Highway 61 crossing, there will be a new visual impact as a result of the Project. Distribution and transmission line crossings exist elsewhere along U.S. Highway 61. Dairyland has worked with the MRPC to understand concerns related to the new crossing location. On the west side of U.S. Highway 61, although some trees will be cleared within the 100-foot-wide ROW, Dairyland placed the Proposed Alignment to minimize tree clearing, the westerly pole will be shielded to some extent from the remaining forested area which partially shields it from view (see **Figure 2-5**). Regarding the east side of U.S. Highway 61, Dairyland has placed the easterly alignment in an area where minimal large tree removal will occur on the north side of the Proposed Alignment (see **Figure 2-6 and 2-7**). The south side of the alignment is presently sparsely vegetated. The span length between the two poles is approximately 800 feet, which is near the maximum span length of 1,000 feet. The poles will be red-brown (weathered steel), which will allow them to blend with existing colors in the area. The crossing will also occur perpendicular to the road, which was the preference of the MRPC. Dairyland will continue to coordinate with the MRPC and MnDOT as the Project progresses.

3 CONSTRUCTION PROCEDURES

During construction of an overhead transmission line, several different work functions happen concurrently at any given location. As illustrated in **Diagram 3-1**, construction will follow Dairyland's standard construction and mitigation best practices:

- Collection of geotechnical data (soil borings) required for final design of the transmission line;
- Surveying and staking will be used conducted during multiple phases of the Project;
- Installation of erosion and sediment control best management practices (BMPs) prior to anticipated ground disturbance activities;
- Mobilization and preparation of staging / laydown yards;
- Road improvements or development to provide access to the ROW;
- Clearing activities of the ROW;
- Installation of construction mats in wetlands or other unstable soil areas, and installation of temporary bridges across waterways prior to construction along the ROW;
- Temporary material staging along the ROW prior to construction installation;
- Grading, excavation, and foundation installation;
- Structure setting;
- Wire stringing and clipping once there are enough structures set consecutively in a row to support a wire pull;
- Removal of existing transmission circuits;
- Cleanup and restoration of ROW; and
- Demobilization and laydown yard cleanup.

Permanent structure locations are unknown at this time. As described in Section 3.1, collection of geotechnical data will be necessary for final design of the transmission line and will be performed prior to construction activities.

The following information provides additional detail on the major construction activities, their approximate sequence, typical construction machinery used, and the anticipated impacts associated with each activity:

Surveying and Staking – Surveying and staking will be conducted during multiple phases of the Project and will include locating and marking the ROW and authorized off-ROW access roads, sensitive environmental resource boundaries, foundations or structure locations, property or section lines, underground and aboveground utilities, etc. Surveying and staking will be performed prior to and sometimes after construction activities such as during constructability reviews, soil borings (geotechnical investigations), staging / laydown yards, clearing, installation of foundations and hole excavations. These activities have limited impact on the environment or landowners and are generally completed by a two-person crew travelling by foot, ATV, or pick-up truck.

Erosion and Sediment Control – Installation of erosion and sediment control BMPs will be implemented prior to anticipated ground disturbance and in accordance with the Minnesota Pollution Control Agency (MPCA) National Pollutant Discharge Elimination System (NPDES)

Construction Stormwater General Permit. Erosion and sediment control equipment includes ATVs and trucks for crew transportation, as well as skid loaders, tractors, backhoes, hydro-seeders, and other light-duty equipment. BMPs will be inspected, maintained, repaired, and replaced in accordance with the MPCA Construction Stormwater General Permit.

Mobilization and Preparation of Staging / Laydown Yards – Initially, labor and equipment will be mobilized to prepare laydown yards for temporary trailer(s) and security measures to receive materials, storage containers, portable toilets, dumpsters, construction mats, tools, and equipment, etc. Activities involved to prepare the staging / laydown yards include installation of erosion and sediment control BMPs, any leveling of uneven surfaces, stripping and stockpiling of topsoil (if necessary), and installation of gravel, tracking pads near entry/exit, if needed, installation of culvert(s), power, and fencing. This work is generally completed using equipment such as a bulldozer and dump trucks. The disturbance from the laydown yard is dependent on soil type and topography. Depending on landowner preferences, laydown yards may be left in place or returned to prior conditions following construction activities.

Road Improvements and Development – In order to access the ROW, Dairyland may need to improve existing access roads, or develop new access roads. Road improvements may include tree trimming, tree clearing, road grading, widening and fill placement. Only construction mats will be used in wetland features; construction mats will be removed after completion of construction activities (see Construction Matting and Bridge Installation below). This work is generally completed using equipment such as a bulldozer, track-hoe, skid-loader, and dump trucks. The travel surface of the access road is generally 20 to 25 feet wide. The total amount of disturbance of the road (cut slope to base of the spoils slope) is dependent on soil type and topography. Depending on landowner preferences and permit requirements, access roads may be left in place or returned to prior conditions following construction.

Clearing of ROW – To facilitate construction equipment access and ensure safe clearances between vegetation and the transmission line, all vegetation will be cleared for the full width of the ROW. Vegetation will be cut at or slightly above the ground surface using mechanized mowers, sky trims, processors, harvesters, or by hand. Rootstocks will generally be left in place, except in areas where stump removal is necessary to facilitate the movement of construction vehicles, or when reasonably requested by the landowner. Side trimming the ROW would happen shortly after the clearing is completed. Following the side trimming, a final mowing of debris and stump cleanup will be completed. Where permission of the landowner has been obtained, stumps of tall-growing species will be treated with an herbicide to discourage re-growth.

Construction Matting and Bridge Installation – Matting will be used as a protective measure that minimizes ground impacts and will be installed to provide access through wetlands or other unstable soil areas prior to construction. Mats are also used to support and stabilize large equipment required for construction. Construction mat travel lanes will generally be 16 to 20 feet wide. Construction matting may consist of composite timber, or laminate mats and will be installed with rubber-tired grapple trucks, forwarders, forklifts, or skid loaders. The line will be constructed in segments with mats being moved and used in other segments as construction progresses.

In addition, permitted temporary bridges will be installed over waterways. Equipment bridges will be designed to meet the requirements of the applicable agencies and local authorities. Bridges will

be installed during clearing and will be removed as soon as possible during final restoration once the bridge is no longer required to complete and monitor restoration activities. Fording of waterbodies is prohibited (i.e., civil survey, potholing, or other equipment are not permitted to ford waterbodies prior to bridge placement).

Additional Temporary Workspace – ATWS beyond the 100-foot-wide ROW may be required at certain locations, such as road or railroad intersections, utility crossings and along steep slopes. In addition, there will be temporary staging of materials such as structures and hardware along the ROW prior to construction installation. This work involves such equipment as semi-trucks, loaders, and cranes to unload structures and other materials near each work location. Dairyland will avoid the placement of ATWS in wetlands and near waterbodies as practicable.

Grading, Excavation, and Foundation Installation – Prior to foundation installation, Dairyland will install a construction mat platform generally 40 feet by 40 feet around the structure location to ensure a level and safe working area. In some cases, Dairyland may grade an area approximately 40 feet by 40 feet around the structure location.

Excavation is required for all structures whether they are direct-embedded or use reinforced concrete foundations. In general, the excavated holes for each type of foundation will range from five to 10 feet in diameter and 20 to 50 feet in depth, or greater, depending on soil conditions. The method of installation, diameter and depth of the foundation will vary depending on the soil capability and structure loadings. For direct-embedded poles, a hole will be excavated to the appropriate depth. The base of the structure will be placed into the excavated hole or, if soils are unstable, into a culvert, the area around the pole will be backfilled with clean granular fill or concrete. For structures requiring a reinforced concrete foundation, the required hole will be excavated, and a rebar cage and anchor bolts will be placed into the excavation. The excavation will then be filled with concrete to a point where the rebar cage and anchor bolts are covered leaving a typical one to two-foot reveal of the foundation above grade with exposed threaded anchor bolts. The complete caisson will then be allowed to cure. Typical equipment for this phase of construction would include dump trucks, drill rigs, cranes, vacuum trucks, concrete mixers, and tanker trucks.

In areas with high water tables, or where water is needed to stabilize the hole during drilling, it may be necessary to dewater the excavation. Depending on site conditions, the water may be filtered through a geotextile filter bag or similar method and discharged to an upland area where it can re-infiltrate or be removed from the site via a tank truck. Appropriation and discharging activities will follow applicable regulations and permit requirements to ensure compliance with Minnesota water quality standards.

Structure Setting – For base plate structures (mounted on concrete foundation), the above-grade structure would be placed on the anchor bolt pattern, leveled, and tightened down. For direct-embedded structures, the base section would be installed, leveled, and backfilled with granular or flow-able fill. After that, the top section or sections will be installed. At each section, hydraulic jacking systems are typically used to slide the joints together to the engineered and fabricated tolerances. Equipment used for this phase of construction would include cranes and bucket trucks at each structure location.

Wire Stringing and Clipping – Once there are a sufficient number of structures set consecutively in a row to support a wire pull, the equipment for the wire pull is mobilized to the pull area and is set up. The conductor and static wires are then pulled and clipped into place. This stringing and clipping activity requires access to each structure with a bucket truck, crane, or helicopter. Other handling equipment used for this phase of construction includes reel trailers, wirepullers, and related stringing equipment.

Wire stringing areas or wire pulling areas are approximately 40 feet by 300 feet. At a minimum, at each wire pulling area, matting will be placed under wire equipment for construction grounding purposes. Incidental matting will also be required at most road crossings. Matting will be removed by similar equipment used for installation as each wire pull or construction segment is completed. During mat placement, use, and removal, standard procedures will be implemented to prevent or minimize the spread of invasive species.

Removal of Existing Facilities – Where replacing or overbuilding existing transmission circuits, the existing structures and wire will be removed. The removed materials will be evaluated to determine their appropriate disposal. Typical equipment used includes cranes, bucket trucks, reel trailers, wirepullers, and related stringing equipment. Where existing transmission structures are to be removed, it is common practice to remove the structure to a depth of at least 4 feet below grade; however, in some cases the structure may be cut off at grade. The determination will be site specific and will be based on the type of structure, land use at the site, and construction vehicle access constraints.

Cleanup and Restoration of ROW – Upon completion of construction, cleanup and site restoration occurs. This includes removing construction mats, TCSBs, and other material or debris from the ROW. Any necessary seedbed preparation and seeding is performed along with BMPs. Typical equipment used for these activities include mat trucks, bobcats, pickup trucks, and other light-duty vehicles.

Demobilization and Laydown Yard Cleanup – The last step in the construction process is final cleanup of the laydown yards by removing all items such as trailers, security fence, left over materials, storage containers, portable toilets, dumpsters, construction mats, tools, and equipment from the Project site. Once the final laydown restoration is complete per contractual agreement with the applicable landowner, the construction phase is complete.

3.1 Geotechnical Borings

Collection of geotechnical data will be necessary for final design of the transmission line and will be performed prior to construction activities. Soil borings are generally completed using rubber tired or tracked drill rigs, depending on site and access conditions. A pick-up truck or ATV transports the crew and drilling supplies to the work area. Construction mats may be installed as needed based on site conditions and where access is required in wetland areas. Sites will be restored to pre-construction conditions upon completion of geotechnical investigations. Dairyland will obtain the applicable permits and approvals prior to conducting this work.

The Project is located in a region of Minnesota known to have karst features. The Minnesota Department of Natural Resources (MDNR), in its early coordination comments, noted the presence

of karst in the Project area, noting that several karst features have been documented within 1,000 feet of the Project area (see **Appendix D**). Karst landscapes can develop where the dissolution of soluble bedrock can result in voids, sinkholes, springs, caves, or other such features at or near the surface.[5] This necessitates planning to identify karst features prior to construction, as well as development of a contingency plan should karst features be encountered during construction.

Dairyland will develop a Karst Survey Plan that will identify the locations of the proposed geotechnical investigations in relation to proposed structure locations, in addition to geophysical studies. Dairyland will coordinate with the MDNR regarding the Karst Survey Plan prior to execution of the geotechnical investigations.

Two geophysical methods will be performed due to different limitations associated with each method. The first geophysical method to be prescribed will be resistivity. This will involve using a multi-channel resistivity measurement array to create a ground resistivity image from the ground surface to the desired depth. Two resistivity measurements will be taken at each structure location, perpendicular to the other. Resistivity imaging is particularly useful with karst voids filled with clay. Clay is highly conductive and shows up clearly in resistivity images. When voids are filled with air or water, resistivity imaging is not as informative.

The second geophysical method that Dairyland will use is Multichannel Analysis of Surface Waves (MASW), which is a type of seismic survey that images the ground beneath the survey by measuring the propagation velocities of surface waves generated by a seismic source, such as a sledgehammer striking a metal plate. MASW can be better at imaging karst voids when they are air or water filled.

Combining the resistivity and MASW imaging is a proven method for increasing confidence in karst void detection. Ideally, no unexpected voids will be encountered during construction. However, following completion of the studies noted above, Dairyland will develop a Karst Contingency Plan prior to construction that includes actions to take to mitigate any unexpected voids encountered during construction. Dairyland will work with the MDNR to develop the Karst Contingency Plan prior to construction.

[5] https://www.nps.gov/subjects/caves/karst-landscapes.htm

4 AGENCY AND TRIBAL OUTREACH

Dairyland began contacting agencies with potential interest in the Project in mid-2023. Then, once the Proposed Alignment was developed after the open houses were held, Dairyland sent initial notification letters to eleven Tribal Nations and well as federal, state, and local agencies with potential interest in the Project on December 18, 2023. Dairyland has incorporated information received during agency consultations into the relevant sections of the Joint Application which will be submitted in March 2024. Where additional coordination has occurred, Dairyland will summarize that outreach with references to the section of the Joint Application which will provide additional detail.

5 RECREATIONAL RESOURCES

Recreational resources crossed by and near the Proposed Route are shown on **Figure 5-1**. The Zumbro River and the Mississippi River are located near the Project but will not be impacted. Several MDNR interests are also in the Project area but will not be crossed or otherwise impacted by the Project.

The Project Alignment crosses two sections of the Zumbrowatha Grant-In-Aid snowmobile trail system at MPs 0.2 and 9.7. The trail system is managed by the Elba Snowbirds. The Project Alignment also crosses USACE interests associated with the Rolling Prairie Property (see **Section 10.1**) as well as the U.S. Highway 61 Scenic Byway (see **Section 2.3**).

Dairyland has designed the Project to avoid impacts to the recreational opportunities in the Project area. Regarding the snowmobile trail crossings, transmission lines are not incompatible with snowmobile trails. The Zumbrowatha trail system presently crosses the CapX2020 system in the area of the first crossing, and the second crossing is near U.S. Highway 61. Dairyland currently plans to construct the transmission line from June 2027 – July 2028, which will likely not conflict with the winter use of the trail system. If construction activities will impact any of the snowmobile trails, Dairyland will coordinate with the trail associations regarding notifications and possible temporary trail closures and/or re-routes. Dairyland is minimizing impacts to the U.S. Highway 61 Scenic Byway (see **Section 2.4**) and has coordinated the route across USACE interests in the Rolling Prairie Property, which may be used for future recreational opportunities (see **Section 10.1**). Therefore, no additional mitigation measures are proposed.

6 ENVIRONMENTAL JUSTICE

Dairyland evaluated the socioeconomic setting of the Project area on a regional basis, comparing data for Wabasha County and the State of Minnesota. Additional detail will be provided in the Joint Application; however, results are presented here.

Data compiled from the U.S. Census Bureau are summarized in **Table 6-1.**

Table 6-1. Socioeconomic Characteristics within the Project Area[6]

Location	2022 Population	White Alone Population	Median Income (2018-2022)	Percent Below Poverty Level	Language Other than English Spoken at Home (2018-2022)
State of Minnesota	5,714,300	82.6%	$84,313	9.6%	12.0%
Wabasha County	21,658	96.8%	$75,063	7.5%	3.1%

An environmental justice analysis for the Project was completed using the methodology in Minnesota Statutes (Minn. Stat.) 216B.1691, subd. 1(e) (rev. 2023). Census tracts that intersect with the Project were analyzed for environment justice areas, consistent with this statute. The Project Route Width intersects one census tract identified in **Table 6-2**. Wabasha County was used as a reference population for the census tracts.

Table 6-2. Environmental Justice Communities per Minn. Stat. 216B.1691, subd. 1(e) Criteria[7]

Census Tract	Percent People of Color	Percent Below 200 Percent of Poverty Level	Percent Limited-English Speaking Population (2017-2021)
Census Tract 4902	2.9	16.2	0.3

Dairyland utilized MPCA's "Understanding Environmental Justice in Minnesota" web-based mapping tool by drawing the Project Route Width into the mapping tool to determine whether the Project intersects any census tracts with environmental justice populations based on the definition above. Based on the data provided in MPCA's web-based mapping tool, the census tract intersected by the Project is not considered an environmental justice community under the Definition provided in Minn, Stat. 216B.1691, subd. 1(e). Additionally, the Project does not cross any areas located within "Indian country," as defined in 18 United States Code 1151.

Dairyland also conducted its environmental justice analysis in accordance with the U.S. Environmental Protection Agency (USEPA) Federal Interagency Working Group on Environment Justice (EJ) and National Environmental Policy Act (NEPA) Committee's publication, Promising

[6] U.S. Census QuickFacts, downloaded January 2024: https://data.census.gov/.
[7] MPCA, 2024. Understanding environmental justice in Minnesota. Available at: https://mpca.maps.arcgis.com/apps/MapSeries/index.html?appid=f5bf57c8dac24404b7f8ef1717f57d00

Practices for EJ Methodologies in NEPA Reviews (Promising Practices). Using this methodology, the USEPA's Environmental Justice Screening Tool (EJScreen) was used as an initial step to gather information regarding minority and/or low-income populations; potential environmental quality issues; environmental and demographic indicators; and other important factors. Wabasha County was used as the comparable reference community to ensure that all affected environmental justice communities are properly identified.

Table 6-3 identifies the minority populations by race and ethnicity and low-income populations within the State of Minnesota, Wabasha County, and the two U.S. Census block groups within the Census Tract crossed by the Project. No block groups crossed by the Project are considered environmental justice communities using the USEPA methodology.

Table 6-3. Minority and Low-Income Populations within the Project area (USEPA methodology)[8]

State/County/Census Block Group	% Total Minority [a]	% Below Poverty Level
State of Minnesota	21.7	9.3
Wabasha County	6.0	8.4
Census Tract 4902, Block Group 2	3.4	8.1
Census Tract 4902, Block Group 3	1.9	6.7
a "Minority" refers to people who reported their ethnicity and race as something other than non-Hispanic White		

There are no environmental justice communities impacted by the Project, so no environmental justice impacts are anticipated. Because impacts to socioeconomics will be generally short-term and beneficial, no mitigation is proposed.

[8] Data Source: US Census 2022 ACS 5-Year Estimates Detailed Tables File# B03002 and File #B17017, downloaded January 2024: https://data.census.gov/

7 CONTAMINATED MATERIAL

The Applicant is not aware of any potentially contaminated materials along the Project corridor. Should potentially contaminated materials be identified on MnDOT ROW during surveys or construction, the Applicant will stop work and consult with MnDOT.

As described in **Section 3**, construction of an overhead transmission line requires several different activities at any given location. Grading, excavation, access, and travel across the MnDOT ROW may occur during construction of the Project.

7.1 Commercial/Industrial Areas

The landscape in the Project area east of U.S. Highway 61 includes commercial/industrial areas. Utility infrastructure is common across the Project, including near the site of the Kellogg Substation where multiple transmission and distribution lines meet. The Applicant is not aware of any contaminated materials resulting from commercial/industrial activity along the Project corridor.

7.2 Dewatering

The Applicant is not aware of any contaminated groundwater along the Project corridor. In areas with high water tables, or where water is needed to stabilize the hole during drilling, it may be necessary to dewater the excavation. Depending on site conditions, the water may be filtered through a geotextile filter bag or similar method and discharged to an upland area where it can re-infiltrate or be removed from the site via a tank truck. Appropriation and discharging activities will follow applicable regulations and permit requirements to ensure compliance with Minnesota water quality standards.

7.3 Potentially Contaminated Sites

The Applicant reviewed the Proposed Alignment where collocated and/or where it intersects MnDOT Trunk Highways for sites included in the MDA's and MPCA's What's in My Neighborhood (WIMN) databases. Three MPCA WIMN sites are located within 500 feet of the Proposed Alignment where collocated and/or where it intersects MnDOT trunk highways (see **Table 7-1** and **Appendix C3**). An excel attribute table is also included in **Appendix B1**. Two sites are registered feedlots, and the other site is a Hazardous Waste Generator; therefore, no impacts are anticipated.

Table 7-1. MPCA's WIMN Sites Near the Project and MnDOT ROW

Nearest Milepost	MPCA WIMN Site Name	Site ID	Activity	Appendix C3
2.8	Jack Stamschror Farm	84713	Feedlots	Extent 1
4.9	Countryside Sales	49863	Hazardous Waste Generator	Extent 2
5.8	Myron Meyer Farm	72745	Feedlots	Extent 2

8 REGULATED WASTE AND STORAGE TANKS

As described in **Section 2**, the Project requires the relocation of transmission line infrastructure to a new ROW. Some existing structures will be removed or modified; however, these activities will be limited. Any demolition material will be removed from the Project ROW and properly disposed of. The Applicant is not aware of any other storage tanks, regulated materials, excess materials, or waste concerns along the Project corridor.

9 VEGETATION

9.1 Soils Considerations

As described below and in more detail in Section 6.1, soils disturbance within the MnDOT ROW will occur. Additionally, the Project may result in soil disturbance under canopy of existing woody vegetation within or near MnDOT ROW. Although the Project crosses areas with steep slopes[9] associated with the Mississippi River Bluffs, the Proposed Alignment does not cross steep slopes on MnDOT ROW. However, the Proposed Alignment does cross areas with highly erodible soils on MnDOT ROW as presented on **Table 9-1** and **Appendix C4**. An excel attribute table is also included in **Appendix B1**.

Table 9-1. Highly Erodible Soils Crossed by the Project on MnDOT ROW

Name	Area Symbol/MUSYM	Water Erodible	Wind Erodible	Representative Slope (and Range)	Appendix C4
Downs-Hersey complex, 6 to 12 percent slopes, moderately eroded	MN157/N574C2	Yes	No	9 (>8-15)	Extent 1
Downs silt loam, 12 to 18 percent slopes, moderately eroded	MN157/N501D2	Yes	No	15 (>8-15)	Extent 2
Downs silt loam, 6 to 12 percent slopes, moderately eroded	MN157/N501C2	Yes	No	9 (>8-15)	Extents 2 and 3

Disturbed areas will be restored to their original condition to the maximum extent practicable, or as negotiated with MnDOT.

Post-construction reclamation activities will include removing and disposing of debris, removing all temporary facilities (including staging and laydown areas), installing appropriate erosion and sediment control BMPs, reseeding areas disturbed by construction activities with vegetation similar to that which was removed with a seed mixture certified as free of noxious or invasive weeds, and restoring the areas to their original condition to the extent possible. In cases where soil compaction has occurred, the construction crew or a restoration contractor uses various methods to alleviate the compaction, or as negotiated with landowners. Further details are provided in Dairyland's Vegetation Management Plan provided in **Appendix E.**

For the Kellogg Substation site, a detailed restoration plan will be developed after the Commission's routing decision is made, and the plan will be prepared as part of Dairyland's Stormwater Pollution and Prevention Plan in accordance with the MPCA Construction Stormwater General Permit. This plan will include the overall site design, including graveled areas, vegetated areas, and a stormwater pond.

[9] Steep slopes defined by MnDOT as 2.5:1.

9.2 Sensitive or Protected Vegetation

The Proposed Alignment crosses one Minnesota Biological Survey (MBS) site known as "McCarthy Lake" (ranked as High) for approximately 630 feet near MP 12.8. The Proposed Alignment would be collocated with County Road 84 at the McCarthy Lake MBS crossing. Temporary impacts to the MBS site will occur during construction activities and forested vegetation within the 100-foot-wide ROW will be cleared and maintained as an herbaceous community during the life of the Project. Dairyland will avoid placement of pole structures within the MBS site by spanning this area, and will minimize forested vegetation clearance by collocating with the road ROW (refer to the Vegetation Management Plan in **Appendix E** for additional commitments). There are no other MBS sites within the Project area, and there are no Native Plant Communities within the Project area.

There are no other designated areas within the Project area which are associated with rare flora communities, such as MDNR SNAs, Native Prairies, or Railroad ROW Prairies. Calcareous fens are discussed in **Section 10.**

9.3 Invasive Species

The movement of construction equipment to, from, and between various work sites may introduce and/or spread invasive species. Terrestrial plant invasive and noxious species in Minnesota are regulated by the Minnesota Department of Agriculture (MDA),[10] and aquatic invasive and noxious species are regulated by the MDNR.[11] The MDNR also manages terrestrial plant invasive and noxious species on public lands and at public waters. The MDNR maintains a geospatial dataset of terrestrial invasive and noxious species observations;[12] according to this dataset, wild parsnip (*Pastinaca sativa*), an MDA control species, has been documented at several locations along State Highway 42 and also along County Road 84.

Dairyland will manage documented occurrences of terrestrial plant invasive and noxious species that are listed as "eradicate"[13] or "control"[14] under the "Prohibited Noxious Weed" category by the MDA. Further, Dairyland will adhere to the requirements set forth by the MDNR Utility License to Cross Public Waters and Natural Heritage Review consultation process. Dairyland proposes to implement the following BMPs during Project construction to minimize the potential for the introduction or spread of terrestrial plant invasive and noxious species:

- Limiting grading and excavation to areas surrounding pole structure foundations, and only as needed along access roads and workspace areas for a level and safe working area.
- Installing construction mats for travel lanes in wetlands and other specific locations.

[10] Minn. Stat. § 18.75-18.913

[11] https://www.dnr.state.mn.us/invasives/index.html

[12] https://gisdata.mn.gov/dataset/env-invasive-terrestrial-obs

[13] Prohibited noxious weeds placed on the noxious weed eradicate list are plants that are not currently known to be present in Minnesota or are not widely established. These species must be eradicated (Minnesota Statute §18.771 (b)(1)). This list is available at: https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list.

[14] Prohibited noxious weeds placed on the noxious weed control list are plants that are already established throughout Minnesota or regions of the state. Species on this list must be controlled (Minnesota Statute §18.771 (b)(1)). This list is available at: https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list.

- All disturbed areas will be revegetated using “Noxious Weeds; None Found” seed mixes.
- All disturbed areas will be revegetated using seed mixes labelled “Noxious Weeds; None Found” in accordance with regulations and will utilize yellow tag seed when available.
- Compliance with MPCA Construction Stormwater General Permit, including stabilization requirements, and inspection, maintenance and repair of erosion and sediment control BMPs. Certified weed-free straw or weed-free hay will be used for erosion and sediment control BMPs.
- All construction equipment must be clean prior to entering and before leaving the work site.
- Manual, mechanical, or chemical management of invasive and noxious weed infestations.
- The Construction Field Representative will oversee BMP installation and effectiveness.

Dairyland has also developed a VMP for this Project that will incorporate these BMPs (**Appendix E**). Dairyland will not conduct activities within waterbodies; therefore, no mitigation to manage aquatic invasive and noxious species are proposed.

9.4 Staging or Access

As described in **Section 6** above, construction of an overhead transmission line requires several different activities at any given location. Staging and access with MnDOT ROW may occur; however, that location information is not available at this time. Refer to **Section 6.1** for a detailed description of construction procedures.

10 WETLANDS AND WATERBODIES

Surface waters in the Project area and along the Proposed Route are shown on **Figure 10-1**. The McCarthy Fen is located 1.4 miles south of the Proposed Alignment. This feature is located adjacent to U.S. Highway 61, the Canadian Pacific Railway and within 750 feet of the CapX2020 transmission line. Residences and agricultural buildings and structures are also located within 0.5 mile of the fen feature. Once a final route has been selected, Dairyland will further coordinate with the MDNR to ensure that ground disturbance activities, such as pole placement, do not disrupt potential groundwater hydrology associated with the calcareous fens.

There are no lakes crossed by the Proposed Alignment and associated 100-foot-wide ROW. Waterbodies crossed by the Proposed Alignment and associated ROW, including the Gorman Creek Public Water, are spaced such that construction activities related to pole placement will avoid impacts to those water resources and work will occur outside of the Ordinary High Water Level. Dairyland may elect to install temporary bridges across waterways prior to construction along the ROW as described in **Section 6.1**. In addition, Dairyland will utilize erosion and sediment control BMPs (e.g., silt fencing) to mitigate the potential for sediment to reach any streams or ponds adjacent construction activities. The Project will not contribute to Gorman Creek's impaired listing for Aquatic Macroinvertebrate Bioassessments as no work will occur in the waterbody.

Temporary impacts to wetlands within the 100-foot-wide ROW will occur during construction of the transmission line. No wetland impacts will occur during construction of the Kellogg Substation. As discussed in **Section 3**, construction mats will be installed in wetlands to minimize compaction and impacts to vegetation. Staging or stringing setup areas will not be placed within or adjacent to water resources to the extent practicable. Wetlands will be restored to pre-construction conditions following completion of construction activities.

The majority of the wetlands crossed by the Proposed Alignment centerline are less than 300 feet long. Span distances between pole structures will vary between 300 and 1,000 feet, which would allow Dairyland to place most poles outside of the wetland footprints and avoid permanent fill. If, however, the final transmission line design cannot enable the Project to span discrete wetland segments, permanent impacts to wetlands will occur where a structure is located in the wetland.

Vegetation maintenance procedures under transmission lines prohibit trees from establishing. Existing trees will be removed throughout the entire ROW, including forested wetlands. The ROW will cross approximately 1,700 feet of forested wetlands; these forested wetlands will undergo permanent vegetative changes within the ROW. Dairyland has also developed a Vegetation Management Plan for this Project (**Appendix E**).

The National Hydrography Dataset (NHD) has mapped 2 waterbodies that intersect the Proposed Alignment on MnDOT ROW (see **Table 10-1** and **Appendix C2)**. An excel attribute table is also included in **Appendix B1**.

Table 10-1. NHD Waterbodies Crossed by the Project on MnDOT ROW

Milepost	Name	Reach Code	Kittle Number	Flow Regime	Appendix C2
2.6	Unnamed	07040004002430	MAJ-070413040	Intermittent	Extent 1
3.2	Unnamed	07040004000473	M-034-017-003	Intermittent	Extent 1

Dairyland, in consultation with the USACE, St. Paul District, anticipates seeking coverage under the Utility Regional General Permit (RGP) once design of the Project is complete. Dairyland has been assigned a Regulatory File No. (MVP-2023-01630-RMH) and a USACE Project Manager for this Project.

10.1 Federal Agency Permits

The Project Alignment crosses USACE interests associated with the Rolling Prairie Property along County Road 84. Dairyland has coordinated with USACE to select a route that is compatible with the Rolling Prairie Property. The USACE will issue Dairyland an easement (Lease for Utility System Facilities on Federal Lands and Property) following Dairyland's completion of the necessary federal forms once a route is issued by the Commission. Issuance of this easement will not require a separate formal federal environmental review process.

Temporary impacts to wetlands that are hydrologically connected to the nation's navigable rivers are protected federally under Section 404 of the Clean Water Act. As described in Section 9 above, Dairyland, in consultation with the USACE, St. Paul District, anticipates seeking coverage under the Utility RGP for authorization to temporarily impact wetlands once design of the Project is complete.

11 FLOODPLAINS

The Project corridor crosses through both shoreland ("Shoreland Overlay Zone") and floodplain ("General Floodplain District") overlay areas for 2.1 and 1.6 miles, respectively. The Kellogg Substation is located outside of shoreland and floodplain areas. The Project, including the planned substation, has been sited to avoid blufflands. Shoreland and floodplain areas are shown on **Figure 11-1.** The Zoning Ordinance recognizes utilities as an important service within the County, but does not specifically identify utility infrastructure, like transmission lines, as either a permitted or conditional use within any of its districts.

Minn. Stat. § 103F.121 requires each county to develop floodplain zoning ordinances in order to preserve the capacity of floodplains to carry and discharge floods and minimize flood hazards. Similarly, Minn. Stat. §§ 103F.201 *et seq.* requires municipalities to develop shoreland ordinances to preserve the economic and environmental values of shorelands and protect and enhance surface waters. Unlike floodplains and shorelands, blufflands do not have mandated state protection. They are, however, ubiquitous in the County and important for their scenic, historic, and ecological value. The County has therefore elected to enact special restrictions on development in these areas. The County's floodplain and shoreland regulations are contained within the Wabasha County Zoning Ordinance.[15] Despite the presence of these zoning regulations, the Project will not need to obtain any special zoning permits to construct the Project, as such local permits are preempted under state law with issuance of a Route Permit (see Minn. Stat. s. 216E.10.1).

[15] https://cms9.revize.com/revize/wabasha/departments/planning_and_zoning/permit_applications_and_forms.php#outer-121sub-147

12 CONSTRUCTION STORMWATER AND EROSION/SEDIMENT CONTROL

The Project will require authorization under the MPCA Construction Stormwater General Permit MNR100001. Approximately 15.4 acres of the Proposed Alignment intersects the MnDOT ROW.

The Project will not result in discharges to special waters nor will the Project contribute to Gorman Creek's impaired listing for Aquatic Macroinvertebrate Bioassessments as no work will occur in the waterbody (see **Section 10**). As discussed in Section 9.1, the Project does cross areas with steep slopes associated with the Mississippi River Bluffs. On MnDOT ROW, as presented in **Section 9.1** and on **Appendix C4**, the Proposed Alignment crosses areas with highly erodible soils.

As described in **Section 6.1**, installation of erosion and sediment control BMPs will be implemented prior to anticipated ground disturbance and in accordance with the MPCA Construction Stormwater General Permit. Erosion and sediment control equipment includes ATVs and trucks for crew transportation, as well as skid loaders, tractors, backhoes, hydro-seeders, and other light-duty equipment. BMPs will be inspected, maintained, repaired, and replaced in accordance with the MPCA Construction Stormwater General Permit.

13 ARCHAEOLOGICAL AND HISTORIC RESOURCES

A cultural resource literature review of the Proposed Alignment and a 0.5-mile buffer on either side was conducted by Merjent, Inc. (Merjent). This literature review and Merjent's evaluation of the possible effects of the proposed Project on historic properties in the Project area was provided to the Minnesota State Historic Preservation Office (SHPO) in a letter dated February 6, 2024; SHPO response to this letter is pending. The following summarizes the results of the literature review.

On December 22, 2023, Merjent retrieved cultural resources site files (archaeological sites and historic structures) and on Tuesday January 16, 2024, retrieved previous survey files from the SHPO. Merjent Cultural Resource Specialists reviewed archaeological site files on the Office of the State Archeologist (OSA) online portal, as well as the General Land Office maps and available historical aerial photography accessed online through the OSA Portal.[16]

One previous past archaeological survey was identified in the area studied by Merjent. The survey overlaps the current Project at the eastern terminus and includes the area that is proposed for the Kellogg Substation. This survey identified and evaluated some sites and determined that they are not eligible for listing on the NRHP.

Based on OSA and SHPO files, no archaeological sites intersect the Project Alignment. There are seven archaeological sites within 0.5-mile of the Project. All of these sites range from 430 to 2,580 feet from any Project elements and will not be directly impacted due to distance.

- One site is located north of, but does not intersect, the Project Alignment. This site is characterized as a historic artifact scatter and includes some structural ruins. It has been recommended as Not Eligible for inclusion in the NRHP. According to the site form, this site has been heavily disturbed by plowing and the removal of buildings. The USACE recently purchased this property as part of the Rolling Prairie Area (see **Section 10.1**).

- Two sites are precontact lithic scatters that are located in close proximity to each other. Both have been determined Not Eligible for listing on the NRHP. Nearby is another site which is a precontact artifact scatter that is unevaluated for the NRHP.

- The remaining sites consist of two historic artifact scatters which have been determined Not Eligible for inclusion in the NRHP, and one burial mound which is unevaluated for the NRHP.

Fourteen historic buildings and structures are located within the Study Area, four of which intersect the Project Area.

[16] https://osa.gisdata.mn.gov/OSAportal

- State Highway 42 has the most significant overlap with the Project Route, as the Project follows parallel to State Highway 42 for a large portion of the route. State Highway 42 was determined Not Eligible for listing on the NRHP in 2022.

- U.S. Highway 61 intersects perpendicularly with the Project. U.S. Highway 61 is a designated Scenic Byway. This property was determined Not Eligible for listing on the NRHP in 2018. Dairyland has met with the MRPC and MnDOT regarding this crossing (see **Section 2.4**) and has included photo simulations of the crossing as **Figures 2-5 through 2-7**.

- A previously-used portion of U.S. Highway 61 (Old Highway 61) intersects perpendicularly with the Project. It was constructed in 1927 and was later superseded when the present-day U.S. Highway 61 was constructed; it is currently designated 161st Avenue and is a paved, crowned-and-ditched road. There is an existing overhead distribution line along this road. This site has not been evaluated for listing on the NRHP. Due to collocation with the existing distribution line, this Project will not result in an appreciable change in viewshed.

- The St. Paul and Chicago Railway Company/Chicago Milwaukee and St. Paul Railway Company/Chicago Milwaukee St. Paul and Pacific Railroad Company River Division Railroad Corridor Historic District is a linear railroad-related property that extends from St. Paul to La Crescent, Minnesota. Various sections of this railroad were constructed between 1869 and 1876. This linear district is considered eligible for listing on the NRHP. It intersects perpendicularly with the Project. At the point of intersection, multiple overhead distribution lines are visible 0.2 mile or less form the railroad. Due to extant lines near this property, the Project will not result in an appreciable change in viewshed. It is also actively used by the Canadian Pacific Railroad.

The remaining historic buildings and structures include nine farmsteads, one bridge, and one culvert and do not intersect Project components. Some buildings have since been removed for the Upper Mississippi River Pool 5 Dredged Material Management Plan Rolling Prairie Site.

Dairyland requested feedback on the Project from the 11 federally recognized Tribes with geography within Minnesota and the Minnesota Indian Affairs Council in its Project notification letters sent in December 2023. To date, no Tribe has conveyed concerns regarding the Project. A copy of the literature review was requested and provided to the Tribal Historic Preservation Officer of the Shakopee Mdewakanton Sioux Community on February 7, 2024.

Seven archaeological sites and fourteen historic buildings and structures were identified during the literature review. There is potential for Historic-era sites within the Project area because the area has been inhabited at least since the 1930s; however, given that the Project is an overhead transmission line project proposed mostly within already disturbed ROWs, there is a low potential for intact historic sites. The Project area could contain pre-contact sites given its location among several water sources. Given that the Project is located in an area with several existing overhead distribution and transmission lines and will be constructed along and within areas of previous disturbance such as existing ROWs, Dairyland is not presently planning to conduct archaeological

surveys ahead of construction. Dairyland will continue to communicate with SHPO regarding the Project.

Dairyland has developed an Unanticipated Discoveries Plan (UDP) that outlies the procedures to follow, in accordance with state and federal laws, should archaeological materials or human remains be discovered during construction of the Project. If any such discovery occurs, construction work will be stopped and the UDP will be consulted as to how to proceed. If human remains are encountered during construction activities, all ground disturbing activity will cease, and local law enforcement will be notified per Minn. Stat. § 307.08.

14 PROTECTED SPECIES PROGRAM REVIEW

Dairyland's consultant, Merjent, submitted a formal Minnesota Natural Heritage Review Request (2023-00935) on December 13, 2023, through the MDNR's Minnesota Conservation Explorer (MCE), and provided an updated route on December 14, 2023. The MDNR's December 18, 2023 early coordination letter (**Appendix D**) confirmed this submittal and noted that a manual Natural Heritage review was required by the MDNR due to the presence of rare features and state-listed species within the vicinity of the Project area, and that Natural Heritage Review staff would contact Dairyland when the final Natural Heritage Review letter is complete and provide all recommendations and requirements for state-listed species. MDNR's Natural Heritage Review response is still pending as of the date of this submittal.

In addition, Dairyland reviewed the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website[17] to obtain a list of federally threatened and endangered species, candidate species, and designated critical habitat that have been previously documented within the vicinity of the Proposed Route (**Appendix D**).

14.1 State-Listed Species

In addition to the MCE request, above, Merjent, consulted the MDNR Natural Heritage Inventory System (NHIS) data through License Agreement LA 1066 on December 14, 2023. MDNR recommends that Project proposers evaluate NHIS records for state-listed species within one mile of Project impacts. Species within one mile of the Project Alignment that are listed as special concern, threatened, or endangered are provided in **Table 14-1**. Species and suitable habitat descriptions for the listed threatened or endangered species are provided below, as well as a conclusion whether there is suitable habitat present within the Proposed Route. Species of special concern are considered state-listed but are not legally protected.

Table 14-1. State-Listed Species within One Mile of the Project Alignment

Common Name	Scientific Name	State Status
A Jumping Spider	*Pelegrina arizonensis*	Special Concern
A Jumping Spider	*Phidippus apacheanus*	Special Concern
A Jumping Spider	*Habronattus viridipes*	Special Concern
A Jumping Spider	*Sassacus papenhoei*	Special Concern
American Eel	*Anguilla rostrata*	Special Concern
Bell's Vireo	*Vireo bellii*	Special Concern
Black Sandshell (mussel)	*Ligumia recta*	Special Concern
Blue Sucker	*Cycleptus elongatus*	Special Concern
Cattail Sedge	*Carex typhina*	Special Concern
Creeping Juniper	*Juniperus horizontalis*	Special Concern
Goat's Rue	*Tephrosia virginiana*	Special Concern

[17] Information for Planning and Conservation (IPaC) Website. Available online at: https://ecos.fws.gov/ipac/. Accessed December 2023.

Common Name	Scientific Name	State Status
Gophersnake	*Pituophis catenifer*	Special Concern
Gray's Sedge	*Carex grayi*	Special Concern
Green Dragon	*Arisaema dracontium*	Special Concern
Kentucky Coffee Tree	*Gymnocladus dioica*	Special Concern
Lake Sturgeon	*Acipenser fulvescens*	Special Concern
Lark Sparrow	*Chondestes grammacus*	Special Concern
Leonard's Skipper	*Hesperia leonardus*	Special Concern
Mississippi Silvery Minnow	*Hybognathus nuchalis*	Special Concern
Muskingum Sedge	*Carex muskingumensis*	Special Concern
North American Racer	*Coluber constrictor*	Special Concern
Old Field Toadflax	*Nuttallanthus canadensis*	Special Concern
Plains Hog-nosed Snake	*Heterodon nasicus*	Special Concern
Plains Wild Indigo	*Baptisia bracteata var. glabrescens*	Special Concern
Red-shouldered Hawk	*Buteo lineatus*	Special Concern
Regal Fritillary	*Argynnis idalia*	Special Concern
Rhombic Evening Primrose	*Oenothera rhombipetala*	Special Concern
Round Pigtoe (mussel)	*Pleurobema sintoxia*	Special Concern
Swamp White Oak	*Quercus bicolor*	Special Concern
Yellow Pimpernel	*Taenidia integerrima*	Special Concern
Yellow-fruit Sedge	*Carex annectens*	Special Concern
Beach Heather	*Hudsonia tomentosa*	Threatened
Blanding's Turtle	*Emydoidea blandingii*	Threatened
Butterfly (mussel)	*Ellipsaria lineolate*	Threatened
Clasping Milkweed	*Asclepias amplexicaulis*	Threatened
Davis' Sedge	*Carex davisii*	Threatened
Fawnsfoot (mussel)	*Truncilla donaciformis*	Threatened
Monkeyface (mussel)	*Theliderma metanevra*	Threatened
Mucket (mussel)	*Actinonaias ligamentina*	Threatened
Spike (mussel)	*Eurynia dilatate*	Threatened
Timber Rattlesnake	*Crotalus horridus*	Threatened
Wood Turtle	*Glyptemys insculpta*	Threatened
Crystal Darter	*Crystallaria asprella*	Endangered
Ebonyshell (mussel)	*Reginaia ebenus*	Endangered
Pallid Shiner	*Hybopsis amnis*	Endangered
Pistolgrip (mussel)	*Tritogonia verrucosa*	Endangered

Suitable habitat for the following state-listed threatened and endangered species is not present within the Proposed Route; therefore, impacts are not anticipated and no mitigation measures are needed:

- Beach Heather;

- Butterfly mussel;
- Clasping Milkweed;
- Davis' Sedge;
- Fawnsfoot mussel;
- Monkeyface mussel;
- Mucket mussel;
- Spike mussel;
- Crystal Darter;
- Ebonyshell mussel;
- Pallid Shiner; and
- Pistolgrip mussel.

Suitable habitat for the following state-listed threatened and endangered species is present within the Proposed Route:

- Suitable habitat for the Blanding's turtle;
- Suitable feeding grounds for the timber rattlesnake; and
- Suitable basking and foraging habitat for the wood turtle.

MDNR's Natural Heritage Review response is still pending as of the date of this submittal. Dairyland anticipates that the MDNR's MCE letter will provide requirements and recommendations to avoid and minimize impacts to these species. Once a final route has been selected, Dairyland will work with the MDNR to implement avoidance and conservation measures necessary to minimize impacts to these species.

14.2 Federally Listed Species

Based on the official species list provided by the USFWS (**Appendix D**), five species federally listed under Endangered Species Act, one species proposed for listing, and one candidate species has been previously documented within the vicinity of the Proposed Route (**Table 14-2**). Species and suitable habitat descriptions for the species in **Table 14-2** are provided below, as well as a conclusion whether there is suitable habitat present within the Proposed Route. No federally designated critical habitat is present within the Proposed Route.

Table 14-2. Federally Protected Species within the Proposed Route

Common Name	Scientific Name	Federal Status
Northern long-eared bat	*Myotis septentrionalis*	Endangered
Rusty Patched Bumble Bee	*Bombus affinis*	Endangered
Higgins Eye Pearlymussel	*Lampsilis higginsii*	Endangered
Sheepnose Mussel	*Plethobasus cyphyus*	Endangered
Spectaclecase (mussel)	*Cumberlandia monodonta*	Endangered
Tricolored bat	*Perimyotis subflavus*	Proposed Endangered
Monarch butterfly	*Danaus plexippus*	Candidate

Suitable habitat for the following federally endangered mussel species is not present within the Proposed Route; therefore, impacts are not anticipated, and mitigation is not needed:

- Higgin's Eye (Pearlymussel);
- Sheepnose mussel; and
- Spectaclecase mussel.

Suitable habitat for the following federally listed, candidate, and species proposed for listing is present within the Proposed Route.

Northern Long-eared Bat

Based on the USFWS Determination Key (DKey) for the northern long-eared bat, in areas with a federal nexus, the Project "may affect, but is not likely to adversely affect" the species. With that determination of effect, a "Consistency Letter" (**Appendix D**) was generated. For areas that do not have a federal nexus, the Project is unlikely to result in "unauthorized take" of northern long-eared bats. Dairyland will commit to the minimization and avoidance measures outlined in the DKey; therefore, no impacts are anticipated.

Rusty Patched Bumble Bee

A portion of the Proposed Route between MPs 12.0 and 13.3, including the Kellogg Substation is within a high potential zone for rusty-patched bumble bees; however, based on a desktop assessment, the majority of the Proposed Route within this segment is in agricultural production, which does not provide suitable habitat for the rusty patched bumblebee. The Proposed Route does cross a non-agricultural area within the high potential zone between MPs 12.8 and 12.9. This area corresponds with the McCarthy Lake MBS site discussed in **Section 9.2** . , Dairyland will avoid placing structures in the MBS site by spanning this area; however, the forested components within the ROW will be permanently converted to herbaceous vegetation. Further, temporary impacts will occur during construction including clearing activities, installation of construction mats, and equipment travel down the ROW. Dairyland has committed to a number of BMPs as outlined in the Vegetation Management Plan **(Appendix E)**. Therefore, impacts to the rusty patched bumble bee are not anticipated.

Tricolored Bat

Potential impacts to individual tricolored bats may occur if clearing or construction takes place when the species is roosting in its summer habitat, in trees outside of hibernacula. Bats may be injured or killed if occupied trees are cleared during this active window. Tree clearing activities conducted when the species is in hibernation and not present on the landscape will not result in direct impacts to individual bats but could result in indirect impacts due to removal of suitable roosting habitat.[18]

[18] USFWS. Species Status Assessment Report for the Tricolored Bat (*Perimyotis subflavus*). Available online at: https://ecos.fws.gov/ServCat/DownloadFile/221212.

Monarch Butterfly

If the USFWS determines the Monarch Butterfly should be listed and protections for the species coincide with Project planning, permitting, and/or construction, Dairyland will review Project activities for potential impacts to the species and develop appropriate avoidance and mitigation measures.

Constructing within and/or adjacent to an existing utility ROW minimizes impacts to suitable habitat for the Monarch Butterfly.

Bald Eagle

If bald eagle nests are identified within 660 feet of construction activities, during the eagle's active season, the Applicant will coordinate with the USFWS and MDNR regarding potential impacts and to obtain the necessary permits.

Dairyland will continue to coordinate with the MDNR and USFWS to avoid and minimize Project impacts on sensitive species.

The following general measures will be used to help avoid or minimize impacts to rare and unique natural resources during and after the completion of the proposed transmission line:

- BMPs will be used to prevent erosion of the soils in the areas of impact.
- Sound water and soil conservation practices will be implemented during construction and operation of the Project to protect topsoil and adjacent water resources and minimize soil erosion. Practices may include containing excavated material, protecting exposed soil, and stabilizing restored soil.
- Disturbed areas will be re-vegetated with native species and wildlife conservation species, where applicable if the landowner agrees.
- Raptor protection measures will be implemented, including following APLIC Avian Safe Design recommendations and placement of bird flight diverters on the line after consultation with the MDNR and/or USFWS.

14.3 Tree Clearing

The Applicant estimates that approximately 0.75 acre of tree removal may be required along the Proposed Alignment where collocated and/or where it intersects MnDOT trunk highways. As described above, Dairyland utilized the USFWS IPaC system for the northern long-eared bat DKey and to generate a species list (refer to **Appendix D**). Dairyland has also completed the MDNR NHIS review via the MCE (refer to **Appendix D**). Dairyland will continue to consult with both agencies as the Project gets closer to tree clearing and construction activities.

15 GLOSSARY OF TERMS

Term	Definition
ATV	all-terrain vehicle
BMPs	best management practices
Commission	Minnesota Public Utilities Commission
Dairyland, or the Applicant	Dairyland Power Cooperative
Dkey	USFWS Determination Key
EJ	Environment Justice
EJScreen	Environmental Justice Screening Tool
ENM	Early Notification Memo
HVTL	high voltage transmission line
IPaC	Information for Planning and Consultation
kV	kilovolt
MASW	Multichannel Analysis of Surface Waves
MBS	Minnesota Biological Survey
MCE	Minnesota Conservation Explorer
MDNR	Minnesota Department of Natural Resources
Merjent	Merjent, Inc.
Minn. Stat.	Minnesota Statutes
MnDOT	Minnesota Department of Transportation
MP	milepost
MPCA	Minnesota Pollution Control Agency
MRPC	Minnesota Mississippi River Parkway Commission
NEPA	National Environmental Policy Act
NHIS	Natural Heritage Inventory System
NRHP	National Register of Historic Places
OSA	Office of the State Archeologist
Project	Wabasha Relocation Project
Promising Practices	Promising Practices for EJ Methodologies in NEPA Reviews
RGP	Regional General Permit
RNC	Rare and Natural Community
ROW	right-of-way
SHPO	State Historic Preservation Office
SNA	Scientific and Natural Area
TCSB	temporary clear span bridge
UDP	Unanticipated Discoveries Plan
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WMA	Wildlife Management Area

16 FIGURES AND DIAGRAMS

Figure 2-1. Wabasha Relocation Project

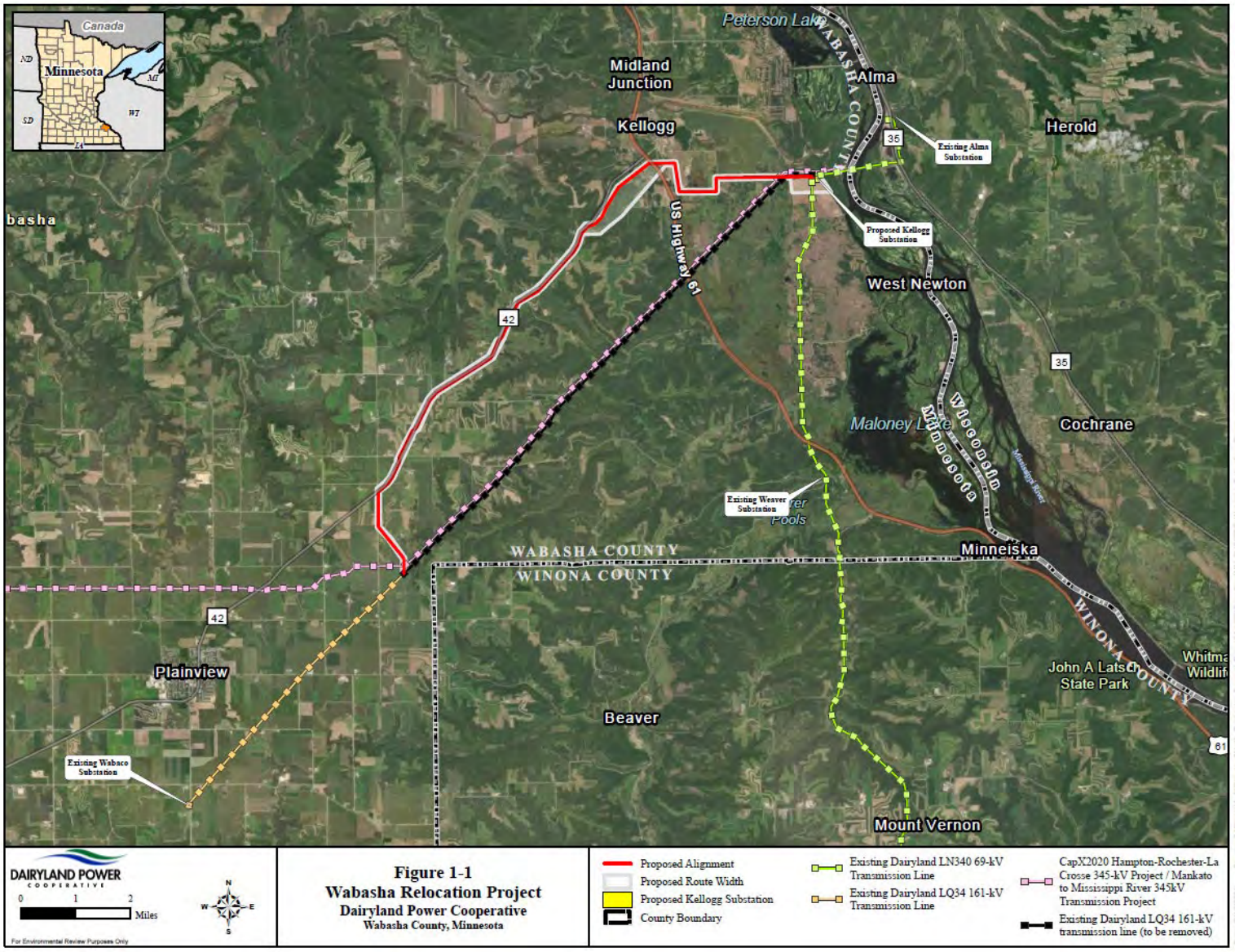

Figure 2-2. Typical Proposed Alignment Right-of-Way

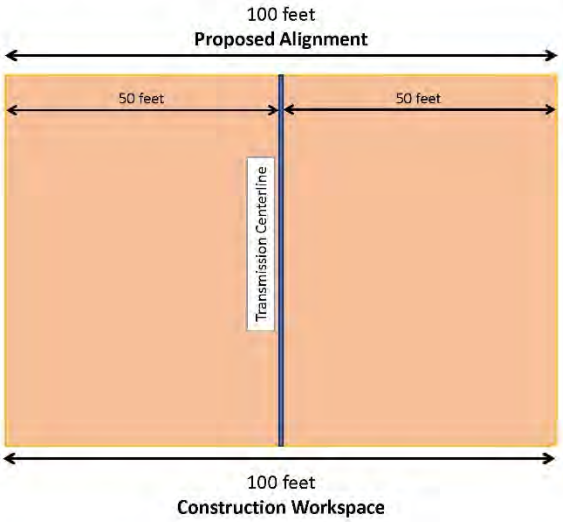

Figure 2-3. Typical 161-kV Transmission Structure Design

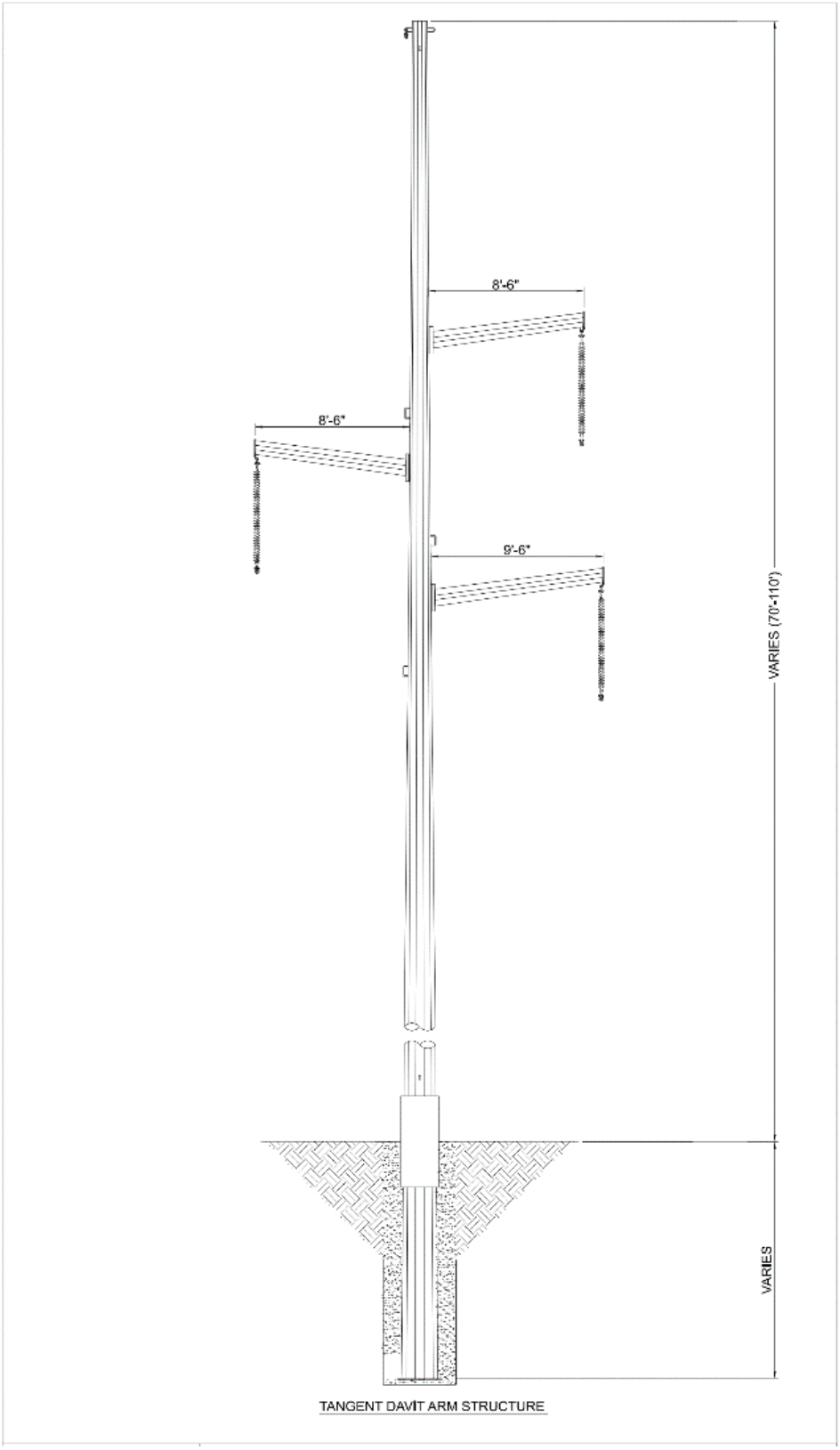

Figure 2-4. Photo of Typical 161-kV Transmission Structure