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February 4th, 2022

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

RE: In the Matter of the Application of Minnesota Power for a Certificate of Need and a Route Permit for the Duluth Loop Reliability Project in Saint Louis County, Minnesota

PUC Docket Number: E015/CN-21-140, TL-21-141

Dear Mr. Storm,

On January 10th, 2022, the Minnesota Public Utilities Commission (PUC) and the Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping Meeting and a request for public comment on the scope of the environmental assessment (EA) relating to the route permit application by Minnesota Power (Applicant) for the above-mentioned project. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding the proposed project and submits the following comments in response to the Notice.

MnDOT appreciates the opportunity to comment on the scope of the EA. MnDOT wishes to participate in the development of the EA so that it will contain a thorough evaluation of the effects various route proposals may have on the state transportation system. MnDOT's fundamental interest is to ensure that the EA identifies and quantifies, to the extent possible, any impacts the proposed high voltage transmission line (HVTL) may have on the safety of the transportation system, the effectiveness of the operations or maintenance of the state trunk highway system and any additional costs that may be imposed on the state trunk highway fund as a result of the location of the proposed HVTL.

The Applicant has proactively consulted with MnDOT during the planning phase of this route. Pages 21-23 (attached) of Appendix M in the Application correctly reflect discussion topics, areas of concern, and key factors associated with the proposed HVTL crossing of Minnesota Trunk Highway (TH) 53. MNDOT believes that the Applicant has a thorough understanding of the challenges presented in crossing TH 53 in this area. Since our discussions in early 2021, new challenges to the placement of this line have been revealed with the Miller Creek Meandering Project. MnDOT has participated in one meeting regarding said project and while the HVTL crossing in this area is still feasible from our perspective, further discussions with the Applicant are required on the following:

- Pole placement – the specifics of where the northeast pole, relative to TH 53, can safely be constructed will need to be agreed upon between the DNR, the Applicant, and MnDOT.
- Construction/Permanent Access – the safest point of access for the same northeast pole is still undetermined as the surrounding area presents several access challenges. Because MnDOT will allow temporary access for construction but not permanent, the Applicant may need to

acquire other landowner approvals for both temporary and permanent access to this part of the project area.

MnDOT anticipates working through these challenges with Minnesota Power, the DNR and other parties in the very near future to come to an acceptable resolution for all.

While the proposed HVTL will likely require one Utility Accommodation on Trunk Highway Right of Way Permit, the Applicant may need more than one type of permit ([MnDOT Permit Forms](#)) such as oversize/overweight hauling and other highway access permitting.

Should the PUC issue a route permit for the Duluth Loop Reliability Project, early coordination with MnDOT staff is strongly encouraged. All applicable permitting, traffic control and construction coordination efforts should be done through MnDOT's District 1 Engineering Specialist, Wayne Scheer at 218-725-2780 / Wayne.Scheer@state.mn.us or Transportation Specialist, Shane Gries at 218-725-2779 / Shane.Gries@state.mn.us

Thank you for the opportunity to provide these comments.

Sincerely,

Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management

cc: Wayne Scheer – MnDOT District 1 Permits
Shane Gries – MnDOT District 1 Permits

Equal Opportunity Employer

Meeting Minutes

Project: Duluth Loop Reliability Project

Subject: Minnesota Power - Duluth Loop Reliability Project

Date: Monday, March 01, 2021

Location: WebEx

Attendees:

Introductions:

- Stacy Kotch Egstad – MnDOT Routing and Siting Coordinator to PUC projects
- Don Berre – MnDOT Aeronautics – North Region Airports and administration of grants
- Ann Driver – MnDOT Utility Permitting
- Wayne Scheer – MnDOT District 1 Permit Supervisor
- Jim Atkinson – Minnesota Power, Environmental and Real Estate Manager, siting and routing transmission lines
- Terri Bagwell – Minnesota Power, Environmental Compliance Specialist and administration and logistics
- Mark Wolcott – Minnesota Power, Transmission Structure Engineer
- Kurt Blomquist – Minnesota Power, Transmission Planning Engineering and Need analysis
- Kyle Larson – Supervisor of Transmission and Distribution and Construction Manager
- Brian Hunker – HDR, Environmental Consulting Project Manager
- Dan Schmidt – HDR, Transmission Line Routing and Permitting

Proposed Agenda:

- Introductions
- Project overview (PowerPoint)
- Trunk Highway 53 crossing
- ROW boundaries
- Airport rezoning status
- Structure type
- Clearances
- Single circuit – counterproductive – hard clearance

Project Overview:

Minnesota Power and HDR provided a presentation that discussed the project need, description, anticipated permits, schedule, and outreach.

The Project will enhance reliability in Duluth and the North Shore areas. Minnesota Power achieved their milestone goal in 2020 with 50 percent generation from renewable sources – wind, solar, and hydro. Minnesota Power is transitioning the generation fleet to coal free by 2035 and carbon free by 2050. Over the last several years, five smaller coal fired plants were idled and need to replace attributes of the coal fired plants.

The 115 kilovolt (kV) transmission voltage is the backbone of Minnesota Power’s system and thus 115kV is the proposed Project’s voltage. The Project includes three components:

- construction of approximately 10-20 miles of new 115 kV transmission line between the existing Ridgeview and Hilltop substations,
- construction of approximately one-mile extension of an existing 230kV transmission line, connecting to the Arrowhead Substation that will reduce potential outages along the 230kV system,
- and upgrades to the existing Ridgeview, Hilltop, and Arrowhead substations
 - Expansions at the Ridgeview and Hilltop substations may be required

Discussion Topics:

- Trunk Highway 53 has two Minnesota Power transmission line crossings
- There are many other utilities alongside Trunk Highway 53 that should be located prior to construction
 - There are planned new sewer lines going into the area – WSB is the engineering company
- MN DOT ROW mapping shows that Trunk Highway 53 has a 200-foot-wide total ROW width near the Haines Road intersection
- Mn DOT general safety criteria
 - Poles must be located outside of highway ROW
 - The ROW edge is 75 feet from centerline on each side of each lane
 - There is either 48 feet or 54 feet separation between lanes
 - The Haines Road intersection has sight corners in the SE and NW corners where MN DOT ROW increases to 100-foot-wide and cannot block the sight lines
- The frontage roads are either city or county managed
- Stacy will provide links to the MN DOT ROW maps and their Utility Accommodation Policy
- MN DOT clearance height is the National Electric Safety Code (NESC) standard by transmission line type and voltage
- MN DOT Utility Accommodation Policy lists that a perpendicular crossing is preferred and if the crossing is not perpendicular than the Permit will need to explain. In addition, MN DOT through that there was a 22-foot offset from their ROW, but that would need to be verified.
- The new transmission line’s maximum span would be 500 to 1,000 feet

- Trunk Highway 53 is a heavy haul route but there are no extra clearance requirements and Minnesota Power would need to follow the basic clearance requirements. Minnesota Power wants to avoid lifting conductors for house moves or other large loads.
- MN DOT's preference is to have the new transmission line adjacent to the existing transmission line. This is a preference more than a requirement. Minnesota Power may prefer separation to assist with routing into the Haines Road Substation.
- MN DOT will provide temporary access for construction but will not allow permanent access
- MN DOT does not have other ROWs than Trunk Highway 53 and Highway 2 in the Project Area
- MN DOT noted that at the existing 57-line crossing, western Trunk Highway 53 crossing, there is a snowmobile trail
- Structure height on the existing 57 line is around 70-foot-tall above ground height. Grade helps as it falls off to the west.
- MN DOT's Office of Environmental Stewardship will review Projects in trunk highway ROW
- Currently there is contaminated soils at the corner of Ugstad Road and Trunk Highway 53
- The Duluth Airport Zoning application was returned for revisions and the airport's team is currently reviewing MN DOT's comments
- Future construction
- MN DOT is updating the intersection of Highway 194 and Trunk Highway 53
- Mn DOT new maintenance buildings planned at Lindahl Road and Trunk Highway 53
- Currently, MN DOT is storing contaminated soils at this site