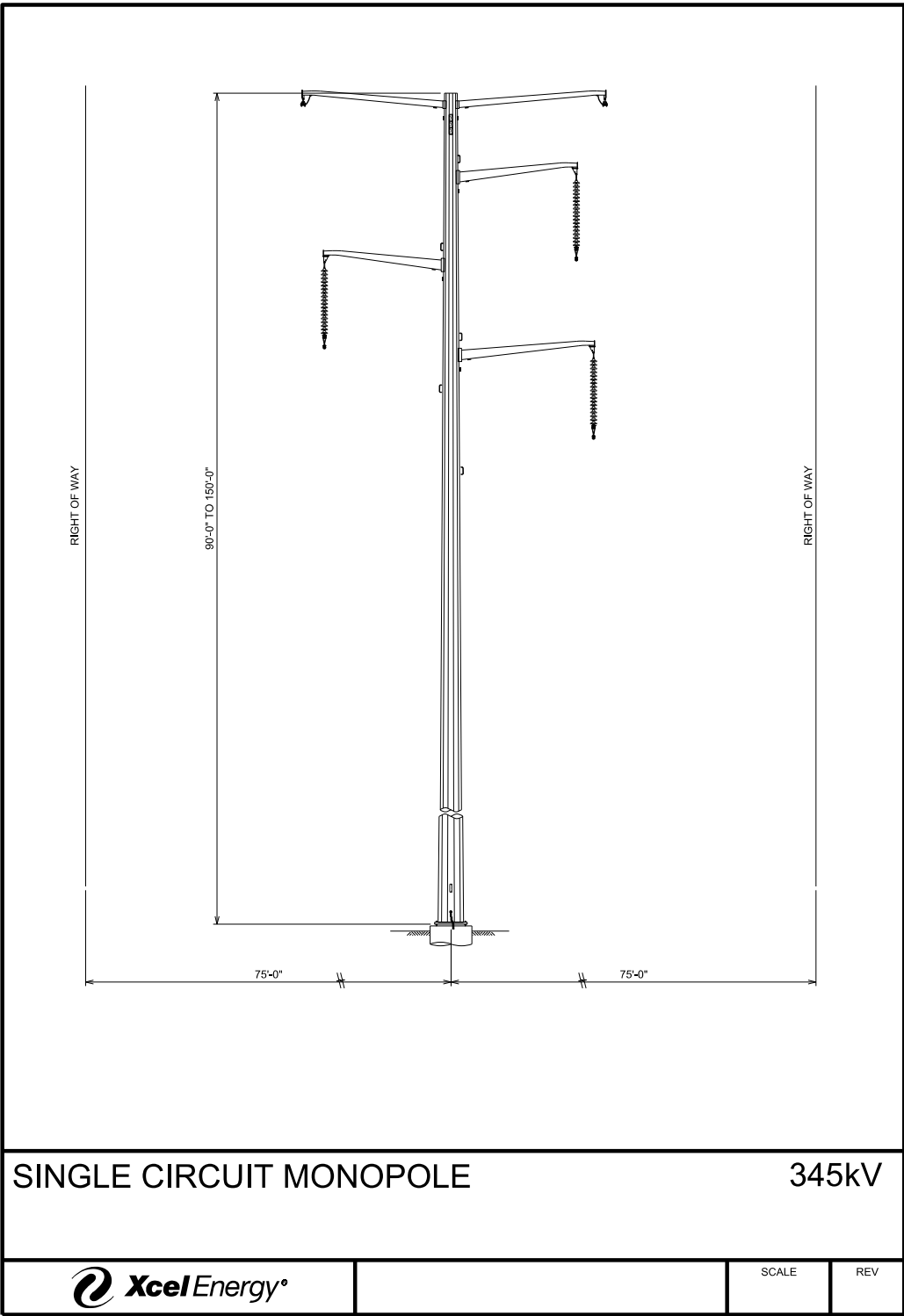
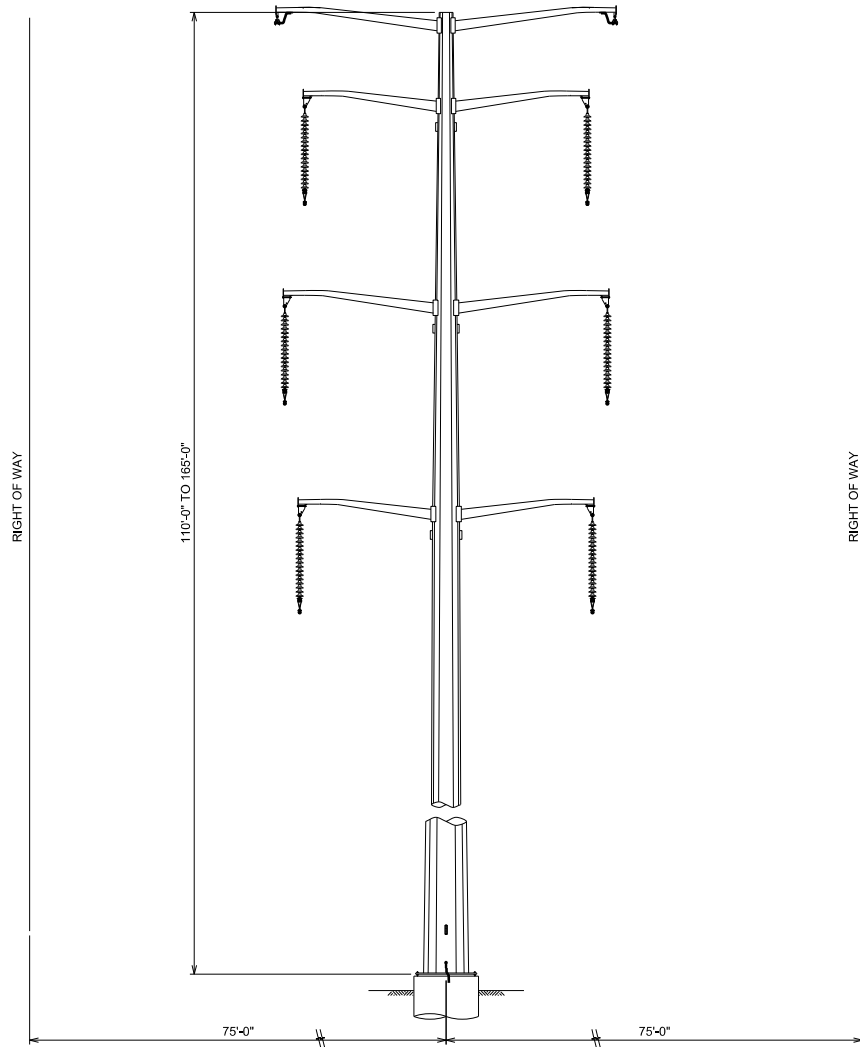


APPENDIX D

Technical Drawings of Proposed Structures





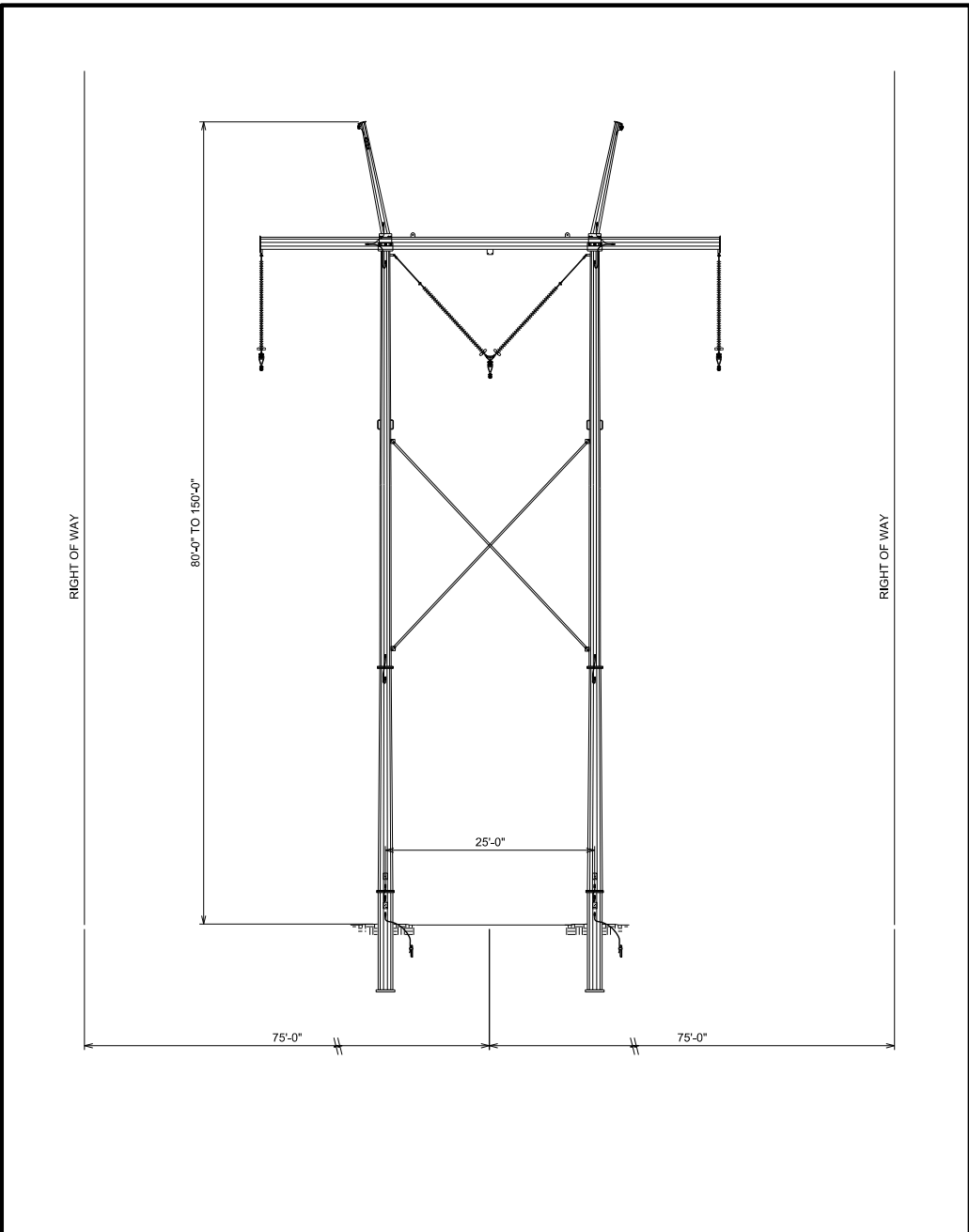
DOUBLE CIRCUIT MONOPOLE

345kV



SCALE

REV



H-FRAME	345kV
	
SCALE	REV

APPENDIX E

Route Development and Selection Process

APPENDIX E

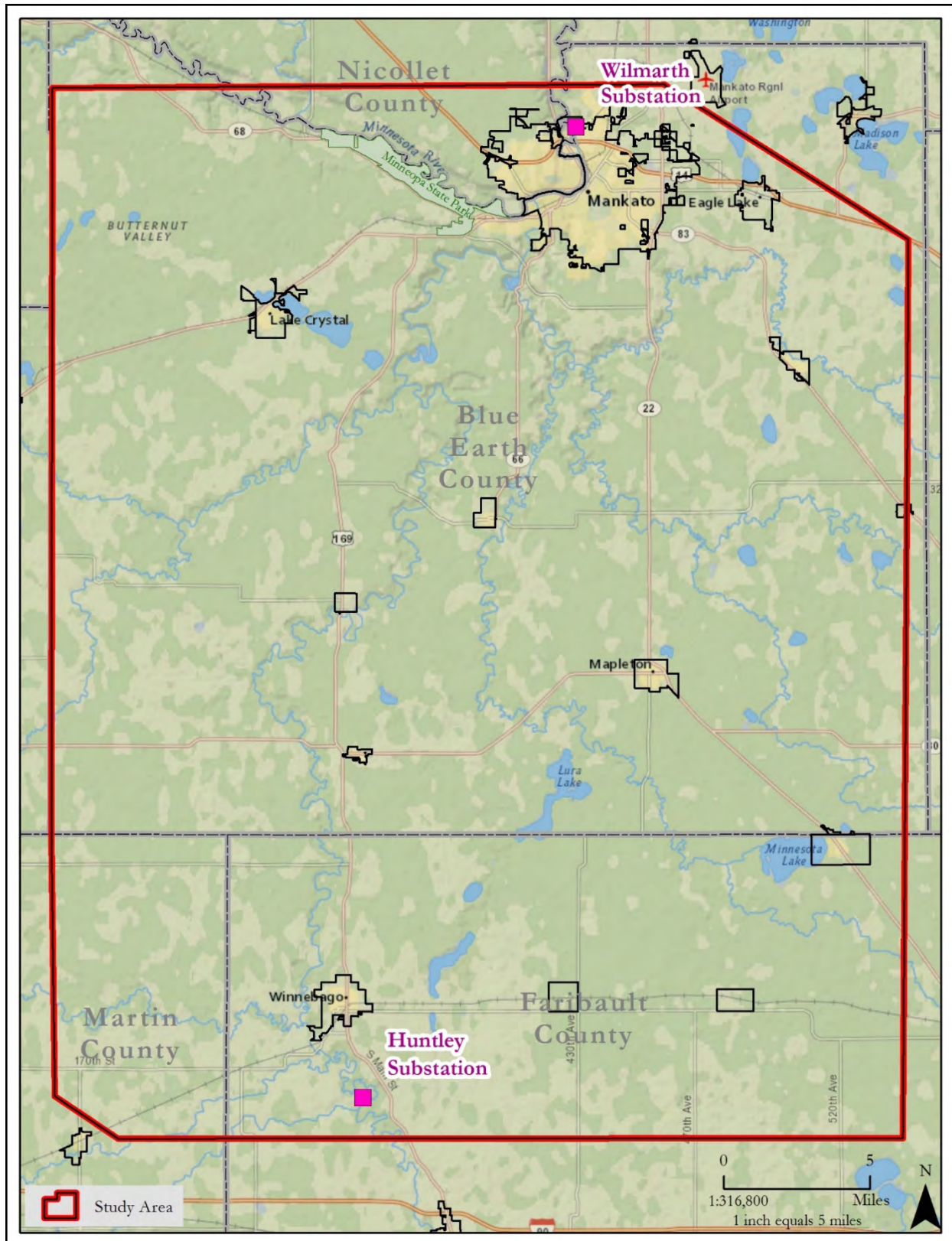
Route Segment Selection Process Summary

The information in this Appendix is provided to supplement and include more detailed information regarding the route selection process used for the Project. Applicants conducted considerable public and agency outreach and information gathering in Blue Earth, Faribault, Martin, and Nicollet counties. As discussed in Section 3.2 of the Route Permit Application (RPA), the Applicants developed a Geographic Information System (GIS) constraints database that contained information gathered from publicly available data resources and from on-site field review efforts.

In addition, the Applicants conducted four public open houses to introduce the Project and gather feedback on preliminary routes from residents, landowners, local government units (LGUs), and other potentially-affected parties. As part of these open houses, Applicants also collected data regarding resources present in the Project Study Area that may not have been identified during the initial information gathering efforts, to assist in the development and refinement of preliminary route options for the Project. The Applicants developed a network of route options by analyzing the GIS constraints data, considering stakeholder feedback acquired during the route development stages of the Project, and adhering to guidance listed in Minnesota Statutes Section § 216E.03, subdivision 7 and Minnesota Rule 7850.4100.

This process resulted in the identification of four routes and several connector segments between the routes presented in the RPA. A more detailed description of each step in the route selection process is provided below.

Figure E-1 Huntley to Wilmarth Project Study Area



ROUTE SELECTION PROCESS AND GUIDING FACTORS

In addition to the statutory criteria mentioned above, Minnesota Statutes § 216E.03 and Minnesota Rule 7850.4100 provide that when determining whether to issue a Route Permit for a high voltage transmission line, the Commission shall consider the following relevant factors:

- A. Effects on human settlement, including, but not limited to: displacement, noise, aesthetics, cultural values, recreation, and public services;
- B. Effects on public health and safety;
- C. Effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;
- D. Effects on archaeological and historic resources;
- E. Effects on the natural environment, including effects on air and water quality resources and flora and fauna;
- F. Effects on rare and unique natural resources;
- G. Application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity;
- H. Use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries;
- I. Use of existing large electric power generating plant sites;
- J. Use of existing transportation, pipeline, and electrical transmission systems or rights-of-way;
- K. Electrical system reliability;
- L. Costs of constructing, operating, and maintaining the facility which are dependent on design and route;
- M. Adverse human and natural environmental effects which cannot be avoided; and
- N. Irreversible and irretrievable commitments of resources.

Initial Route Identification

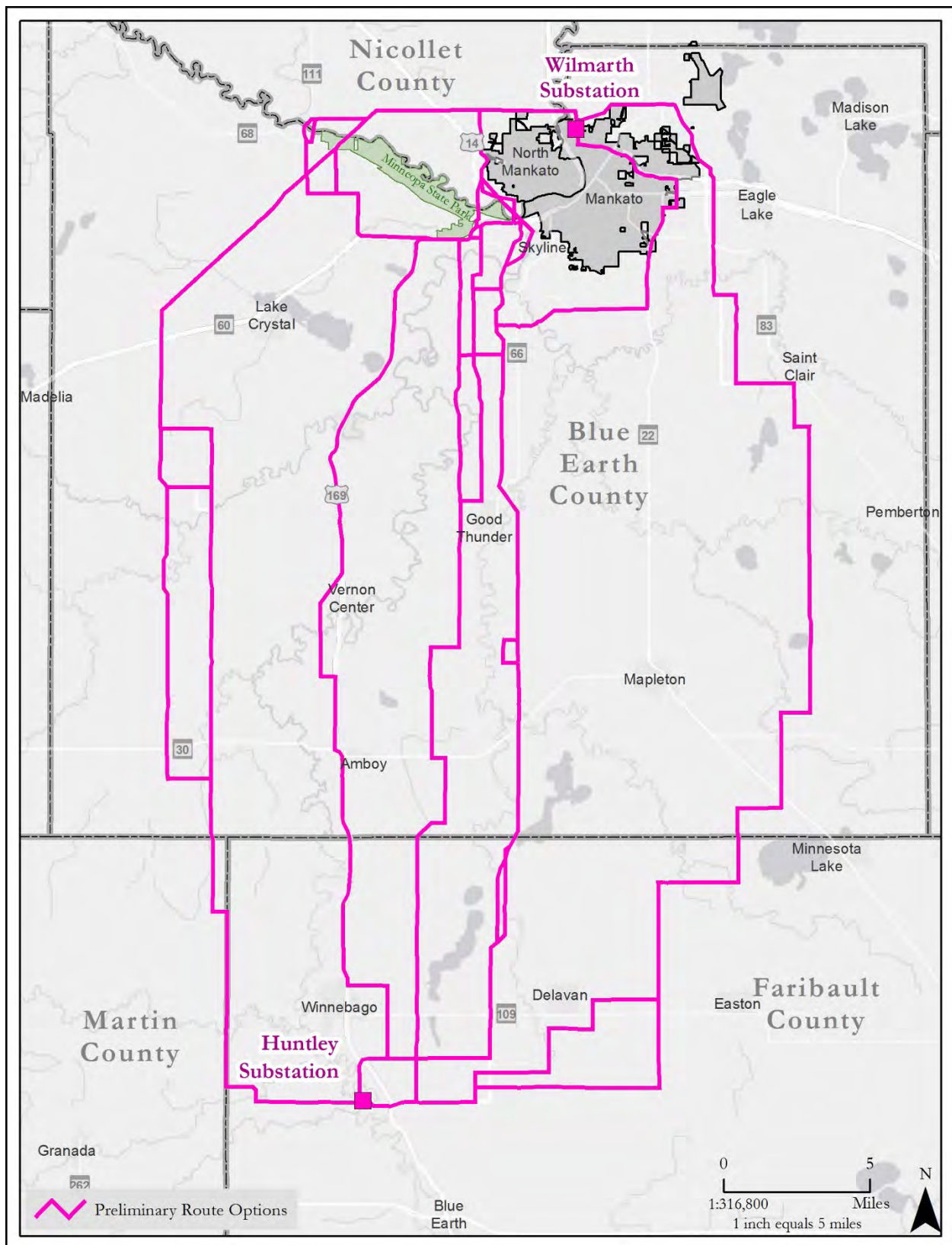
After establishing a Study Area, the next step was to identify potential route segments. The routing criteria used to develop segments primarily reflected those criteria in Minnesota Statutes § 216E.03, subdivision 7, and Minnesota Rule 7850.4100. Practical considerations, such as total project length, constructability, impacts on large environmental areas, and costs were also considered.

As an initial screening criteria, the Applicants identified routing constraints that should be avoided, if practicable (e.g., airports, State Parks, Wildlife Management Areas (WMAs), Waterfowl Production Areas (WPAs), houses, lakes, etc.). The Applicants also identified opportunities for routes, where available (e.g., existing transmission lines and rights-of-way, road rights-of-way, railroads, property division lines, field lines, etc.).

Route segments were evaluated based on information gathered regarding the human and natural environments, such as proximity to homes, wetlands, endangered species, impacts to agriculture, ability to share existing infrastructure corridors, etc. The least impactful segments were identified and combined to form end to end routes (refer to Figure E-2). The Initial Route Network took advantage of existing infrastructure and linear features (electrical transmission lines, roadways, property lines, etc.) and avoided residential areas to the greatest extent practicable. Specific routing considerations outlined the Minnesota criteria such as the following were defined in more detail and were used to narrow down route options:

- Maximize distance from residences;
- Attempt to cross cropland along section or property lines, at narrow areas where it could be spanned, or the number of structures in fields could be minimized;
- Minimize multiple crossings of waterways;
- Minimize woodland clearing;
- Cross pasture, grassland, or rangeland rather than cropland;
- Avoid terrain that makes construction and maintenance of a transmission line more difficult;
- Maximize distance from or identify opportunities to span known archaeological and historic resources sites.
- Minimize multiple crossings of highways in short distances; and
- Maximize distance from radio towers, other communication-related facilities, and wind turbines.

Figure E-2 Initial Route Network



Initial Outreach within the Study Area

Following development of the Study Area and Initial Route Network, several meetings were held with federal, state, county, and local agencies (e.g., Minnesota Department of Natural Resources (MNDNR), U.S. Fish and Wildlife Service (USFWS), and various county and local administrators). The Applicants provided an overview of the route selection process and provided details on the Project schedule and future public outreach efforts (including open houses). The meetings provided an opportunity to discuss the Project in greater detail and to obtain feedback from agency representatives regarding potential resources and concerns unique to the area, and to residents and landowners of each county. The Applicants also requested information on obtaining additional county-specific data that was publicly available to incorporate into the existing GIS database developed for the Project.

The Applicants received written replies from agencies and received four agency requests for GIS data to assist in their review of the Project (refer to Appendix G). Section 7.1 provides a more detailed description of agency correspondence for the Project. As a follow-up to the inquiries and additional information requests regarding potential routing concerns, the Applicants requested/attended meetings with officials from USFWS, MNDNR, Minnesota Board of Water and Soil Resources (BWSR), City of North Mankato, City of Mankato, Belgrade Township, Nicollet County, and Butternut Township.

Site Review of Initial Route Network

After the desktop identification of the Initial Route Network, the Applicants performed a field site reconnaissance of the Study Area. Using data and information gathered from the formal agency responses, county meetings, and the GIS constraints database developed for the Project, the Applicants investigated numerous route segments. Locations of residences, out-buildings, radio and weather towers, transmission lines, and other features were recorded and added to the Project's GIS constraints database. The route segments were reviewed in the context of Minnesota's routing criteria, incorporating those that complied with the Minnesota routing criteria as well as the additional routing constraints considerations, including agency input. Routes that could not avoid major routing constraints, did not take advantage of existing linear features, did not minimize impacts, or created engineering or construction challenges were dropped from further consideration.

The Initial Route Network included numerous route segments that, when combined, created various route combinations (although some routes differed from each other by

only one or two segments). In general, route segments are shorter portions of overall routes that, when joined together, create complete routes between the two connection points. Route segments result when a section of a route branches into other segments or results from multiple individual segments joining together. In joining specific segments, different segment combinations and subsequent routes linking the desired connection points, are created. Routes were reviewed for general constructability and engineering feasibility from a design and planning perspective and reviewed for general compliance with Minnesota Statutes and Rules. Minor adjustments to the Initial Route Network were made based on the results of these reviews.

Public Open House Meetings

Following the development of the Initial Route Network, the Applicants conducted four public open houses, two in Mapleton, Minnesota on June 20, 2017 and two in Mankato, Minnesota on June 21, 2017. Notices for these open houses were provided via newspaper and direct mail. Applicants sent approximately 25,000 direct mail open house invitations to residents, landowners, public officials, and other potential stakeholders (Appendix H). The open house invitation provided information such as a general Project description, a map of the Project Study Area and Initial Route Network, the Project's website address and Applicants' contact information for submission of questions and comments.

The goal of the open house meetings was to gather input from the public on several different transmission line routing options. The route options displayed were preliminary and Project staff communicated that none of the routes were preferred over another at this point in the process. The Applicants received approximately 200 comments submitted by phone, e-mail, or comment forms.

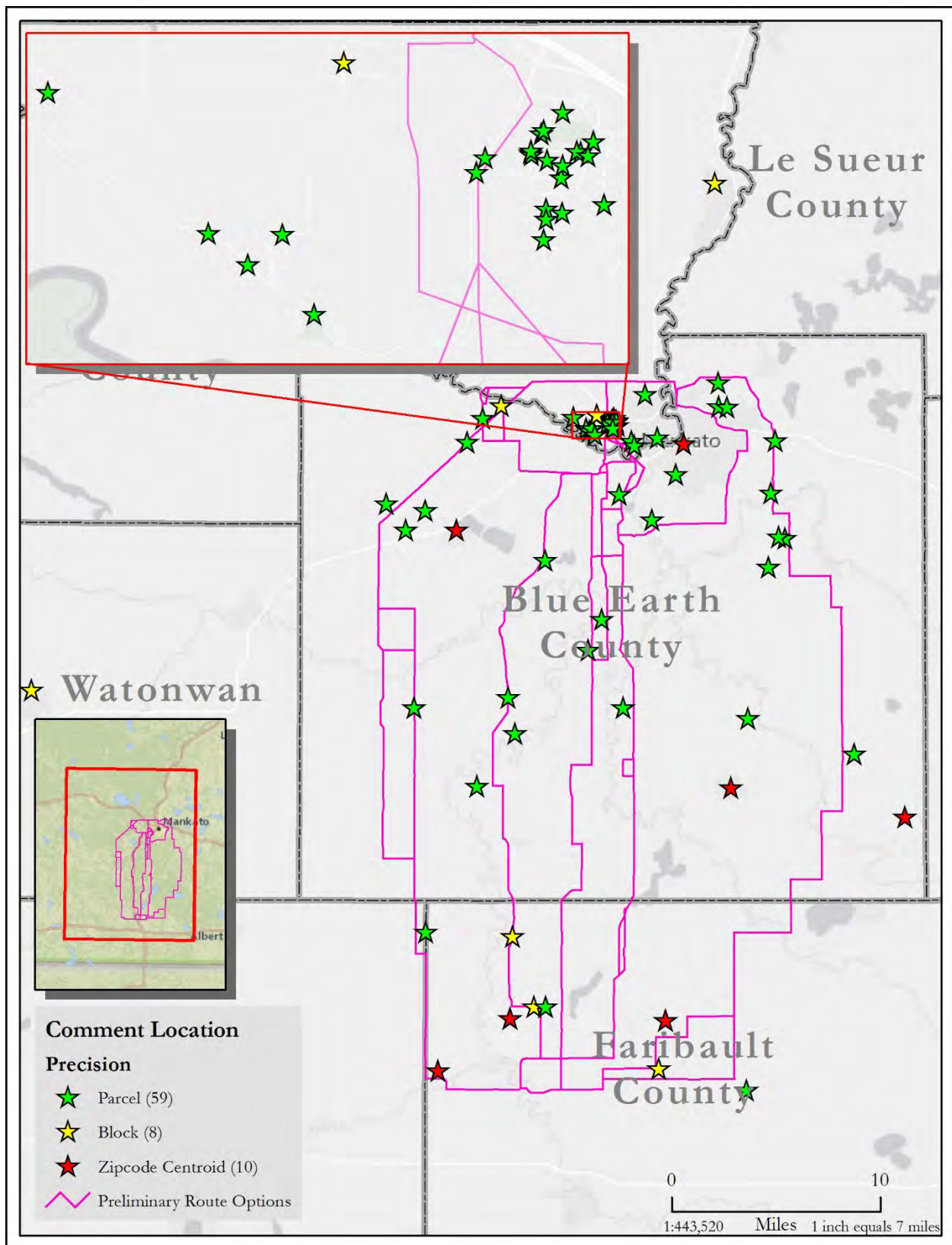
The open house format had several stations to display and communicate the Project to the attendees. Large-scale poster-sized maps were on display depicting the Study Area and Initial Route Network. Attendees could identify their property and Project staff provided a description of the route option, if requested. Several stations were set up and staffed by the Applicants to give the attendees more detailed information and to answer questions. The stations located around the meeting room included the following:

- Right-of-way – to answer questions about right-of-way and landowner compensation;
- Engineering/construction - discuss the process of developing the Project from an engineering standpoint and construction;

- Regulatory permitting - provide overview the permitting process the Project would follow;
- Project need - demonstrate the need for the Project;
- GIS mapping station - assist landowners in locating their property and proximity to Project segments;
- Demand side management - provide customers with resources to reduce energy use; and
- Criteria ranking - rank three routing criteria that were most important to attendees.

Meeting attendees were encouraged to leave comments either at the meeting or following the meeting. The Applicants received approximately 200 comments submitted by phone, e-mail, or comment forms. Figure ES-3 depicts the locations of each comment, where available. Landowner feedback from these open houses included comments and concerns regarding proximity to local airstrips, land use and agricultural practices, preference to follow existing infrastructure, and other route development considerations. More information on the feedback received is available in Section 7.1 of the RPA.

Figure E-3 Project Comment Location



SECONDARY ROUTE NETWORK

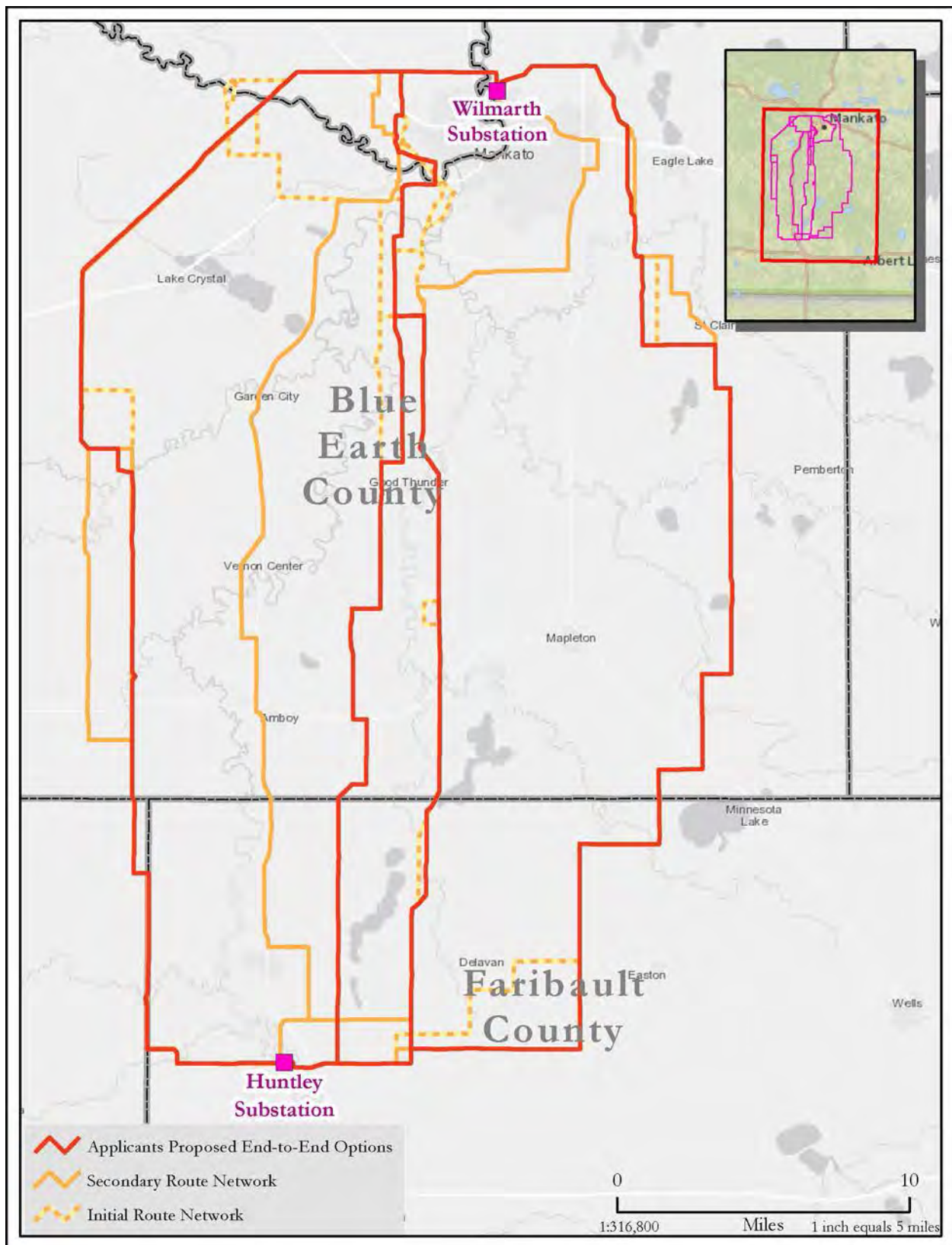
Based on the comments received at the open houses, further development of the GIS constraints database, and the Applicants ongoing route review, the Route Network was revised to consider a subset of route segments, including additional connector segments developed in response to landowner requests or comments. The Secondary Route Network is provided in Figure E-4.

As a result of the extensive number of alternative routes, a multi-step process was developed to assist in the identification of geographically diverse routes and to focus the analysis on the routes with the fewest impacts to natural resources and human settlement.

The Secondary Route Network was analyzed using a set of routing criteria selected to characterize the important features of each route and provide an indication of the potential concerns for environmental and human resources associated with each route consistent with Minnesota's routing criteria. The resulting routes were organized by the nature and extent of their potential impacts, allowing the routes that the Applicants determined were the least compliant with the overall Minnesota Statutory and Rule routing criteria to be removed from further consideration.

In comparing the routes, segments identified to address issues and concerns associated with several municipalities and land features were given additional routing consideration. These included the Cities of North Mankato and Mankato, and their residential developments; Minneopa State Park; the City of St. Clair; Blue Earth River crossings; the WPAs around the Minnesota Lake area; the Center Creek Historic District near Huntley; and the chain of lakes along the Rice Creek and Smith WMAs, and Lura Lake WPA.

Figure E-4 Secondary Route Network



The following sections describe the comparison process the Applicants routing team conducted for specific segments to refine the Secondary Route Network and create end to end routes.

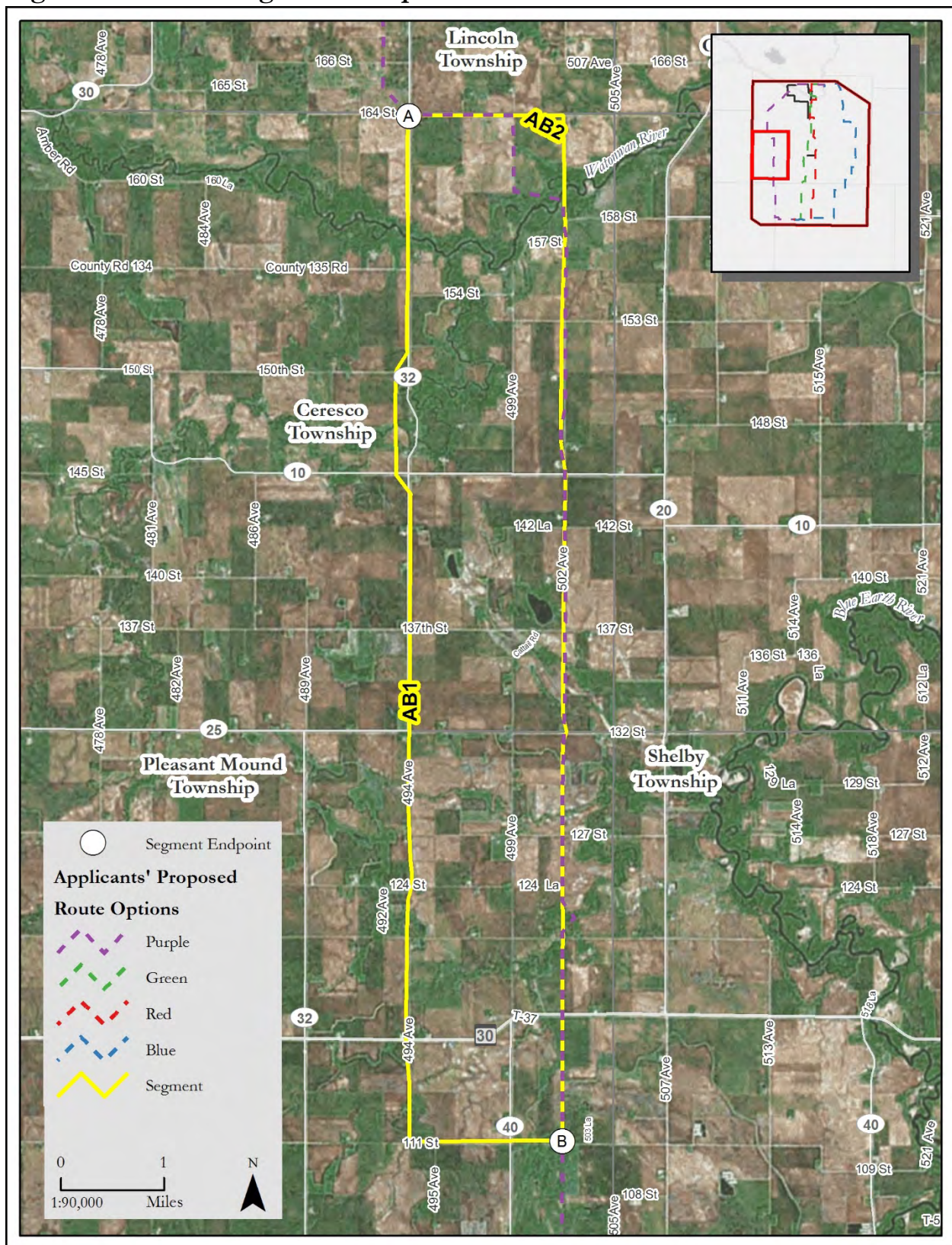
Route Segment Comparison - AB1 and AB2

The Applicants chose **Route Segment AB2** and eliminated AB1 during the route selection process.

- The route segments are the same length; however, AB1 follows existing roads or rail lines for approximately 3.5 more miles.
- Route segment AB2 generally has more natural resource impacts, such as wetland and waterbody crossings. Specifically, the route segment crosses a Site of Biodiversity Significance (SOBS) associated with the Watonwan River, and additional waterbody and forested wetland crossings along the route segment.
- Route segment AB1 crosses the driveway to Attenburg WPA and discussions with USFWS indicate this is not likely an acceptable option. Furthermore, the USFWS is concerned with the natural resource impacts associated with AB1 and noted it is also adjacent to the Evans Slough WPA and WMA.
- Figure E-5 depicts these two route segment options.

Resource Type	Route Segment ID	
	AB1	AB2
Total Length of Route (miles)	11.5	11.5
Follows Existing Transmission Line (miles)	0.5	-
Follows Other Existing Linear Infrastructure (miles)	9.1	5.6
Residences within 150 feet (number)	1	-
Residences within 300 feet (number)	8	3
Agriculture crossing (miles)	1.4	0.6
Forested Wetland Crossing (feet)	122	1,583
Sites of Biological Significance Crossing (feet)	1,167	2,507
Number of Waterbody Crossings (number)	6	9

Figure E-5 Route Segment Comparison – AB1-AB2



Route Segment Comparison – EF1/EF2 and FG1/FG2

The Applicants chose **Route Segments EF1/FG1** and eliminated EF2 and FG2 during the route selection process.

- Although route segment EF2 is shorter and follows other linear infrastructure, EF1 crosses less agricultural land and forested wetland. Furthermore, EF1 does not cross any waterbodies and EF2 crosses the Blue Earth River twice.
- Applicants identified two federal Wetland Reserve Program properties near the Blue Earth River crossings along route segment EF2, where the Applicants believes easements would be unattainable.
- Route segments FG1 and FG2 are similar and the differences are minor. FG1 is shorter and follows more existing linear infrastructure than FG2. Although one residence occurs within 150 feet of FG1, FG2 has six residences within 300 feet while FG1 has three.
- It is possible there may be future development opportunities along FG1 near the golf course at the north end of the route segment; however, FG2 has more agricultural land and SOBS crossings.
- Figures E-6 and E-7 depict these route segment options.

Resource Type	Route Segment ID			
	EF1	EF2	FG1	FG2
Total Length of Route (miles)	5.7	5.0	4.8	5.4
Follows Existing Transmission Line (miles)	-	-	-	-
Follows Other Existing Linear Infrastructure (miles)	-	0.5	2.5	1.8
Residences within 150 feet (number)	-	-	1	-
Residences within 300 feet (number)	2	2	3	6
Agriculture crossing (miles)	0.4	1.4	0.1	0.5
Forested Wetland Crossing (feet)	508	911	1,326	1,284
Sites of Biological Significance Crossing (feet)	-	-	274	591
Number of Waterbody Crossings (number)	-	2	1	1

Figure E-6 Route Segment Comparison – EF1/EF2

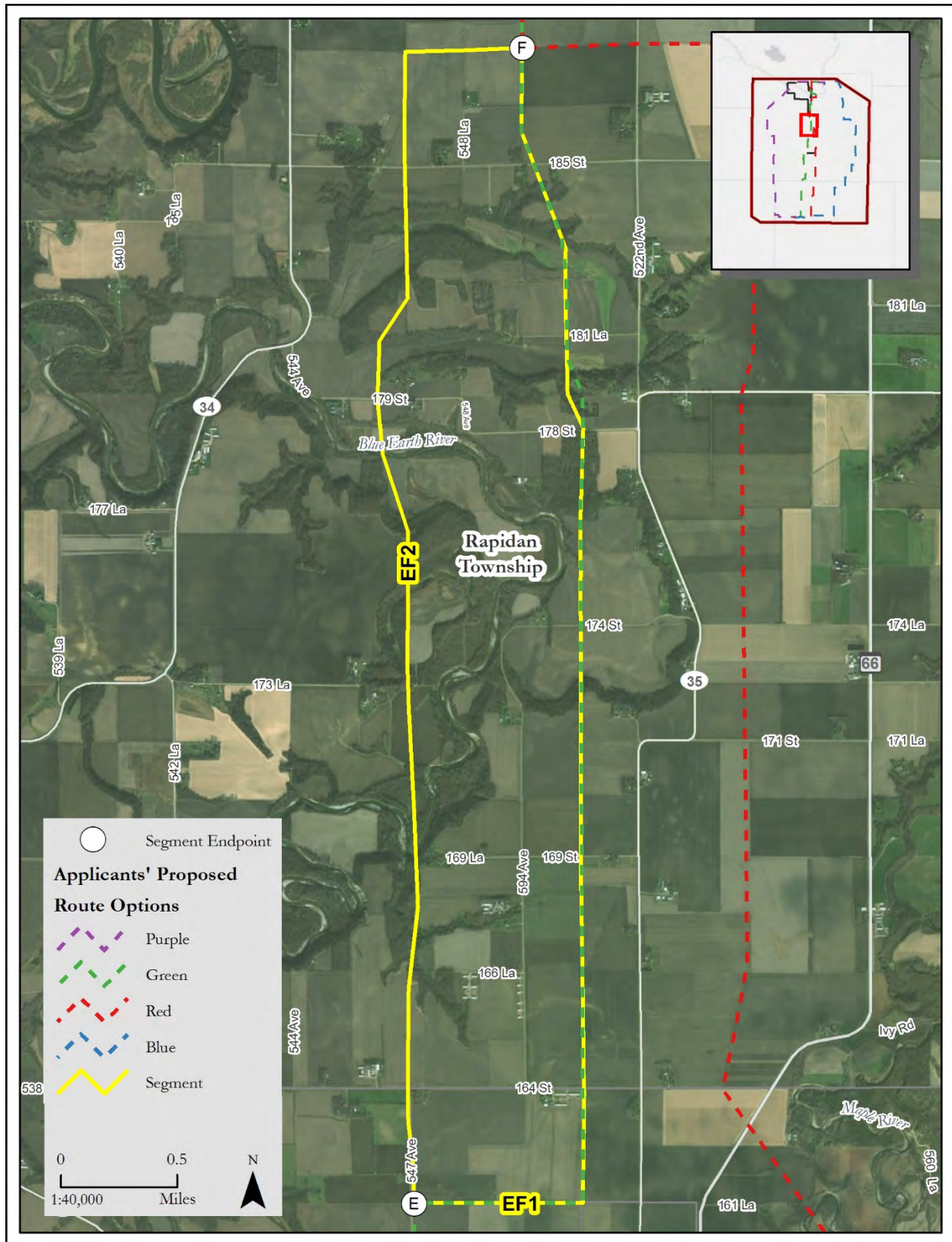
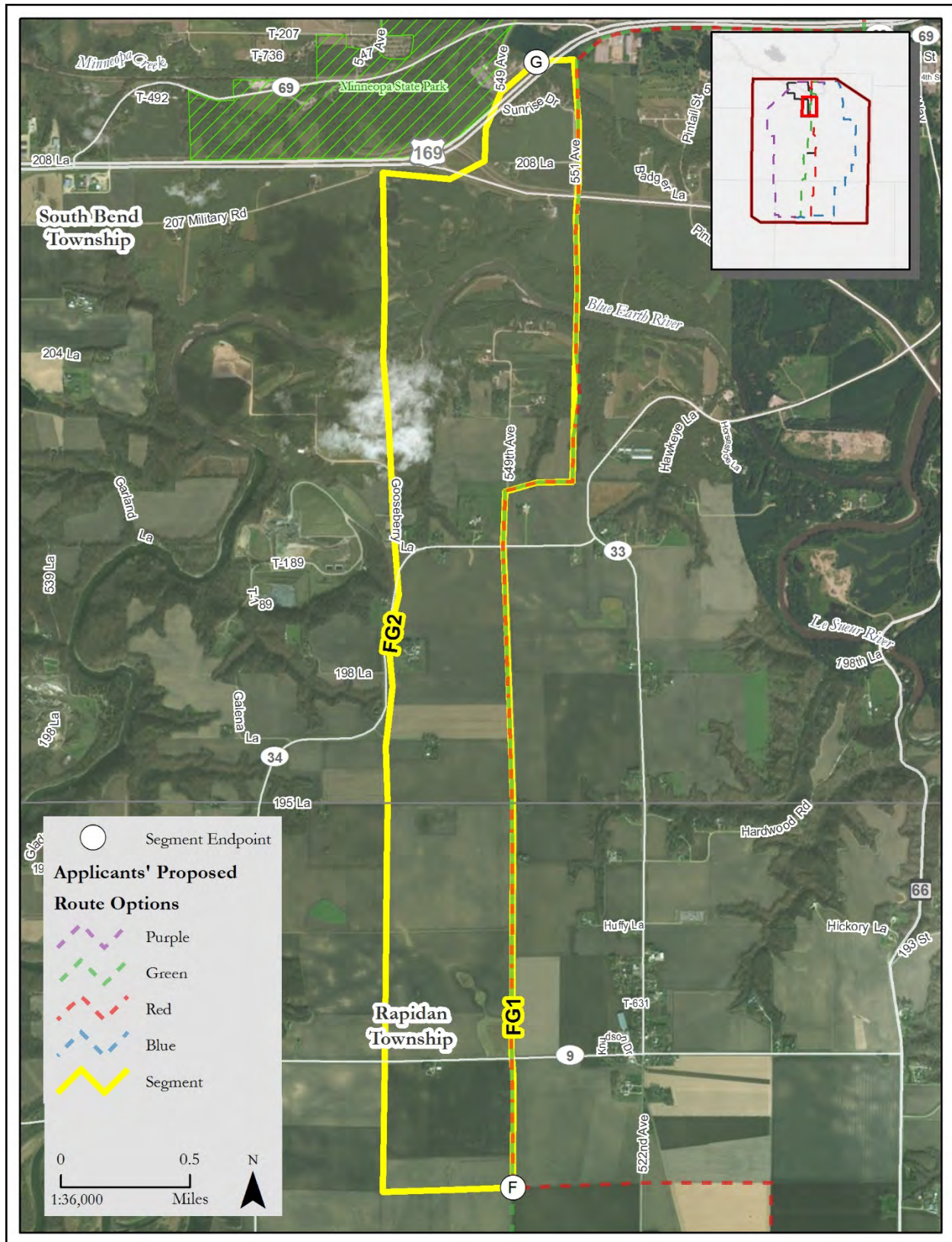


Figure E-7 Route Segment Comparison – FG1/FG2



Route Segment Comparison – HI1 and HI2

The Applicants selected **Route Segment HI2** and eliminated HI1 during the route selection process.

- Route segment HI1 will likely be difficult to permit, especially with the natural resource agencies (e.g., USACE). There are two crossings of the Blue Earth River in close proximity to one another, and HI1 crosses more wetlands (both forested and non-forested) as well.
- Route segment HI2 follows a more industrial corridor, has more residences within both 150 and 300 feet, and is within 150 feet of a church. However, the expected level of natural resource agency interest and riparian and viewshed impacts that could occur along the Blue Earth River prompted
- Figure E-8 depicts the two route segment options.

Resource Type	Route Segment ID	
	HI1	HI2
Total Length of Route (miles)	4.1	4.2
Follows Existing Transmission Line (miles)	-	1.6
Follows Other Existing Linear Infrastructure (miles)	0.8	0.6
Residences within 150 feet (number)	1	7
Residences within 300 feet (number)	14	28
Agriculture crossing (miles)	1.6	0.9
Forested Wetland Crossing (feet)	1,713	162
Sites of Biological Significance Crossing (feet)	783	926
Number of Waterbody Crossings (number)	3	1

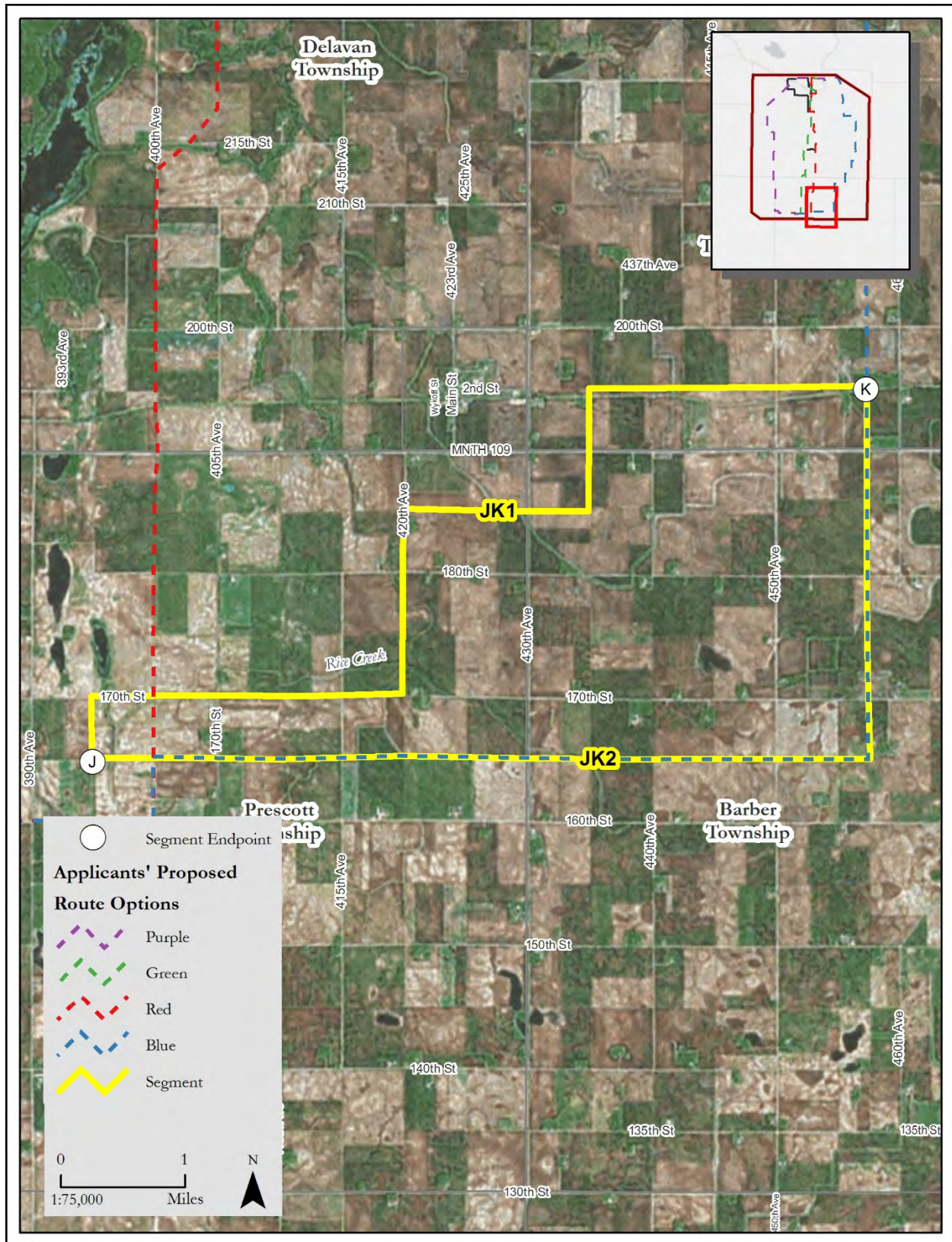
Route Segment Comparison – JK1 and JK2

The Applicants chose **Route Segment JK2** and eliminated JK1 during the route selection process.

- Routes segments JK1 and JK2 are very similar in land use (i.e., agricultural land) and natural resource impacts. Therefore, cost and efficiency were the focus of the routing selection process for these two route segment options.
- The east-west portion of JK2 follows an existing ITC Midwest 161 kV transmission line; therefore, if selected, this Project would double circuit which is typically more expensive than single circuit. However, JK1 is a less direct route with more corners and angles which would likely offset the cost of a double circuit along JK2.
- Route segment JK1 also follows a natural gas pipeline (Magellan) for a portion of its length and is within 800 feet of a private airstrip.
- Figure E-9 depicts the two route segment options.

Resource Type	Route Segment ID	
	JK1	JK2
Total Length of Route (miles)	9.3	9.3
Follows Existing Transmission Line (miles)	-	6.3
Follows Other Existing Linear Infrastructure (miles)	3.0	-
Residences within 150 feet (number)	-	-
Residences within 300 feet (number)	-	-
Agriculture crossing (miles)	1.0	1.0
Forested Wetland Crossing (feet)	-	-
Sites of Biological Significance Crossing (feet)	-	-
Number of Waterbody Crossings (number)	-	-

Figure E-9 Route Segment Comparison – JK1 and JK2



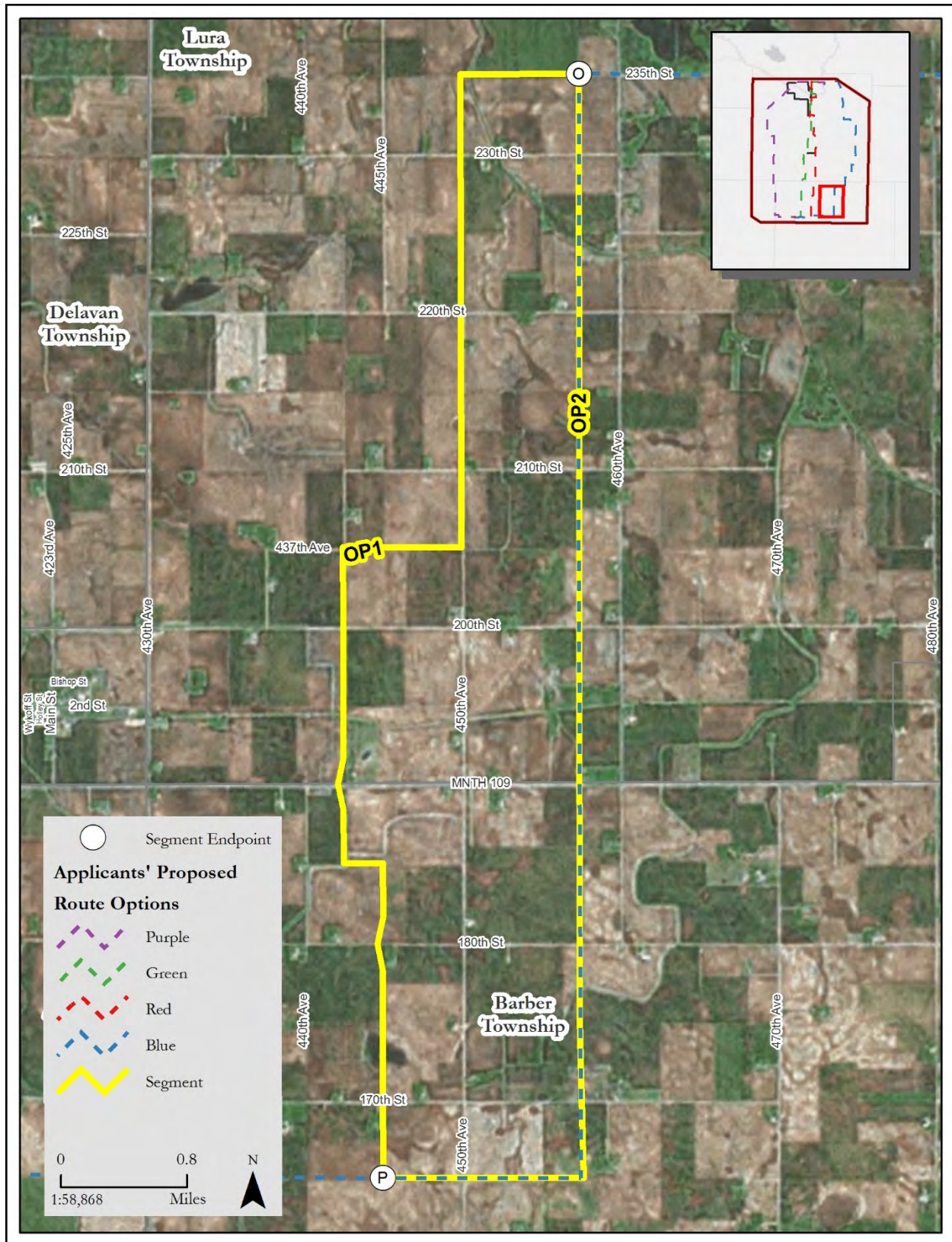
Route Segment Comparison – OP1 and OP2

The Applicants chose **Route Segment OP2** and eliminated OP1 during the route selection process.

- Route segment OP1 was suggested by a landowner during the Applicant's public outreach process. OP1 reduces the agricultural crossing length, but has more residences and would also impact upland forest clearing near the residences.
- Route segment OP2 is a little shorter in length than OP1, follows an existing transmission line for a portion of its length, and has less angles which in turn requires less structures.
- Figure E-10 depicts the two route segment options.

Resource Type	Route Segment ID	
	OP1	OP2
Total Length of Route (miles)	8.8	8.3
Follows Existing Transmission Line (miles)	-	1.3
Follows Other Existing Linear Infrastructure (miles)	1.5	-
Residences within 150 feet (number)	-	-
Residences within 300 feet (number)	2	-
Agriculture crossing (miles)	-	2.5
Forested Wetland Crossing (feet)	-	-
Sites of Biological Significance Crossing (feet)	-	-
Number of Waterbody Crossings (number)	-	-

Figure E-10 Route Segment Comparison – OP1 and OP2



Route Segment Comparison – LM1 through 4

The Applicants selected **Route Segment LM3** during the route selection process; however, included LM2 and LM4 as Route Segment Alternatives A and B in the RPA (refer to Sections 4.5 and 6.10 of the RPA).

- The LM route segments represent options in the northernmost part of the Project, near the Wilmarth Substation. LM1-4 are segments that continue south across a small section of the Minneopa State Park or avoid the park and join at the existing 161 kV transmission line within a Board of Water and Soil Resources (BWSR) conservation easement.
- The Applicants routing team initially evaluated these route segments based on proximity to a neighborhood on the east side of Rockford Road as a result of many comments received landowners and the City of North Mankato during Applicants public and agency outreach process.
- The Applicants created additional route segment options to the west of the initial route segment (LM4) presented along Rockford Road.
- LM1 is the longest, and LM3 and LM4 are shorter segments. LM4 follows Rockford Road and LM3 follows a ravine on the western edge of agricultural fields.
- LM4 has been disputed by the landowners in the North Ridge Neighborhood and LM3 is on the edge of potential future development. LM3 also follows a forested ravine which is also a SOBS area.
- The routing team agreed that with some refinement and if Route Segment LM4 was shifted slightly to the east, it would have less natural resource impacts and maintain its limited agricultural impact.
- Based on the presence of Minneminishoma Falls Park, a dense concentration of archaeological artifacts along the Judson Bottom Road (Segment LM1) and the designation of County Highway 41 as part of the Minnesota River Valley Scenic Byway, LM1 was eliminated from further consideration.
- Based on the varied positions of landowners in North Mankato and Belgrade Township, applicants believe that each of the three remaining segments will likely be seen as preferable by some residents and therefore did not eliminate any of these segments.
- Applicants adjusted LM4 approximately 1/4 mile east to avoid proximity to two homes.
- Figure E-11 depicts the four route segment options.

Resource Type	Route Segment ID			
	LM1	LM2	LM3	LM4
Total Length of Route (miles)	4.6	4.5	3.1	3.1
Follows Existing Transmission Line (miles)	1.0	0.8	-	-
Follows Other Existing Linear Infrastructure (miles)	0.9	0.5	-	1.4
Residences within 150 feet (number)	-	-	-	-
Residences within 300 feet (number)	7	2	1	2
Agriculture crossing (miles)	1.6	2.9	1.6	2.1
Forested Wetland Crossing (feet)	1,069	233	379	372
Sites of Biological Significance Crossing (feet)	-	-	-	-
Number of Waterbody Crossings (number)	6	2	-	-

Following the route segment comparison exercise described above, several trends were identified for each of the developing end to end routes. These trends are summarized below:

- The westernmost route option has a significant length of co-location opportunity along existing transmission lines and roads (approximately 68 percent), as well as opportunity for following property line boundaries (approximately 26 percent). Routing along property lines, particularly in a largely agricultural area minimizes agricultural impacts by avoiding crossing open farmland. This route option has fewer residences, but has a greater number of wetland crossings. The western route option avoids the Cities of North Mankato and Mankato and crosses the Minneopa State Park along an existing transmission line easement.
- The route option along U.S. Highway 169, although generally co-located with the highway (approximately 52 percent), has a much higher number of residences within 300 feet than the other route options and a higher number of state park crossings; this option also crosses more open farmland than most of the other routes (approximately 3 miles). However, this route has a lower number of wetland and other natural feature crossings, including SOBS and BWSR easements.
- The route options in the center of the Project's Study Area have common alignment options coming out of the Wilmarth Substation.
 - The western of the two is the shortest of the route options identified, but is the least co-located with existing transmission lines (approximately 12 percent). It is primarily routed along existing road and rail lines (approximately 27 percent) and existing property lines (approximately 49 percent). This route option has moderate residential proximity and crosses a lower amount of open farm land (approximately 1 mile) and forested wetlands (approximately 0.5 mile) than most of the other route options. However, this route option crosses more upland forest and Native Plant Communities (NPC) than the other route options. This route option intersects the western edge of the City of North Mankato and has another further west option through Belgrade Township.
 - The eastern of these two route options also intersects the western edge of the City of North Mankato and has an option through Belgrade Township. This route option has the highest number of river and creek crossings of all the options identified, and crosses major rivers at six

locations. This route is one of the shortest routes and is co-located along existing transmission lines for approximately 57 percent of its length. This route would cross only approximately 0.4 mile of open farm land, and has fairly high residential proximity compared to the other routes. The route crosses a moderate amount of upland forest (approximately 3 miles), nearly 3 miles of non-forested wetlands, and just over 1 mile of NPCs. This route option also crosses Roberts WPA along an existing easement.

- The most easterly route option avoids the City of North Mankato and Minneopa State Park. This route option is the longest (approximately 57 miles), and is primarily located along property lines (51.7 percent). It has low residential proximity, but crosses areas slated for future development. The east route crosses the highest amount of open farm land of any of the options identified (approximately 6 miles). It also crosses the greatest length of forested wetlands (approximately 1 mile), has the highest number of stream crossings (36), and crosses major rivers at 6 locations. However, this route option does not intersect any parks or WPAs, and has a lower number of natural feature crossings such as SOBS, BWSR easements, or NPCs.

ELIMINATION OF CERTAIN ROUTES

Upon thorough and detailed investigation, evaluation, and consideration, routes were dropped from further consideration for this Project. The routes and reasons for elimination are discussed below.

U.S. Highway 169 Route

Although this is one of the shortest options and generally follows the highway and existing transmission lines, the route option following U.S. Highway 169 has the most instances of residences within 300 feet of the transmission line and generally crosses more populated areas (refer to the following table). This is mainly due to the fact that there are towns and cities which the state highway runs both close to and directly through, making routing difficult (i.e., Garden City, Vernon City, Amboy, and Winnebago). Furthermore, the highway generally follows the Blue Earth River corridor, crossing the Hog Island WMA near Garden City. The elimination of this route reduced the total number of end-to-end route options by two.

Resource Type	
Total Length of Route (miles)	45.3
Follows Existing Transmission Line (miles)	10.4
Follows Other Existing Linear Infrastructure (miles)	23.5
Residences within 150 feet (number)	10
Residences within 300 feet (number)	50
Agriculture crossing (miles)	2.9
Forested Wetland Crossing (feet)	3,231
Sites of Biological Significance Crossing (feet)	5,015
Number of Waterbody Crossings (number)	18

Route Segment Option around City of Mankato

The route segment coming out of the Wilmarth Substation to the east is co-located with an existing Xcel Energy 161 kV transmission line (refer to the following table). The routing along Highway 14 was challenging due to right-of-way constraints and proximity to the schools and other buildings. Furthermore, the City of Mankato's Comprehensive Plan identifies the majority of the route segment as either platted and developed or it has been recently annexed and platted for future development, with some areas being zoned for Commercial and Residential properties. The elimination of this route reduced the total number of end-to-end route options by two.

Resource Type	
Total Length of Route (miles)	56.8
Follows Existing Transmission Line (miles)	14.8
Follows Other Existing Linear Infrastructure (miles)	8.4
Residences within 150 feet (number)	0
Residences within 300 feet (number)	6
Agriculture crossing (miles)	6.3
Forested Wetland Crossing (feet)	4,515
Sites of Biological Significance Crossing (feet)	4,567
Number of Waterbody Crossings (number)	39

ADDITION OF NEW SEGMENTS AND FINALIZATION OF ROUTE OPTIONS

The Applicants added or adjusted route segments in response to comments. Potentially affected landowners were notified of new segments by mail which included maps of the new segments and information on how to provide feedback. The three areas where new segments were introduced are as follows.

Belgrade Township - Additional segments were added in response to concerns about the potential route segment along Rockford Road. The City of North Mankato and residents of the neighborhood east of Rockford Road objected to the route segment based on impacts to the existing neighborhood and potential impacts on future development in the area (refer to Section 7.1.3 of the RPA for more information on the City of North Mankato's concerns).

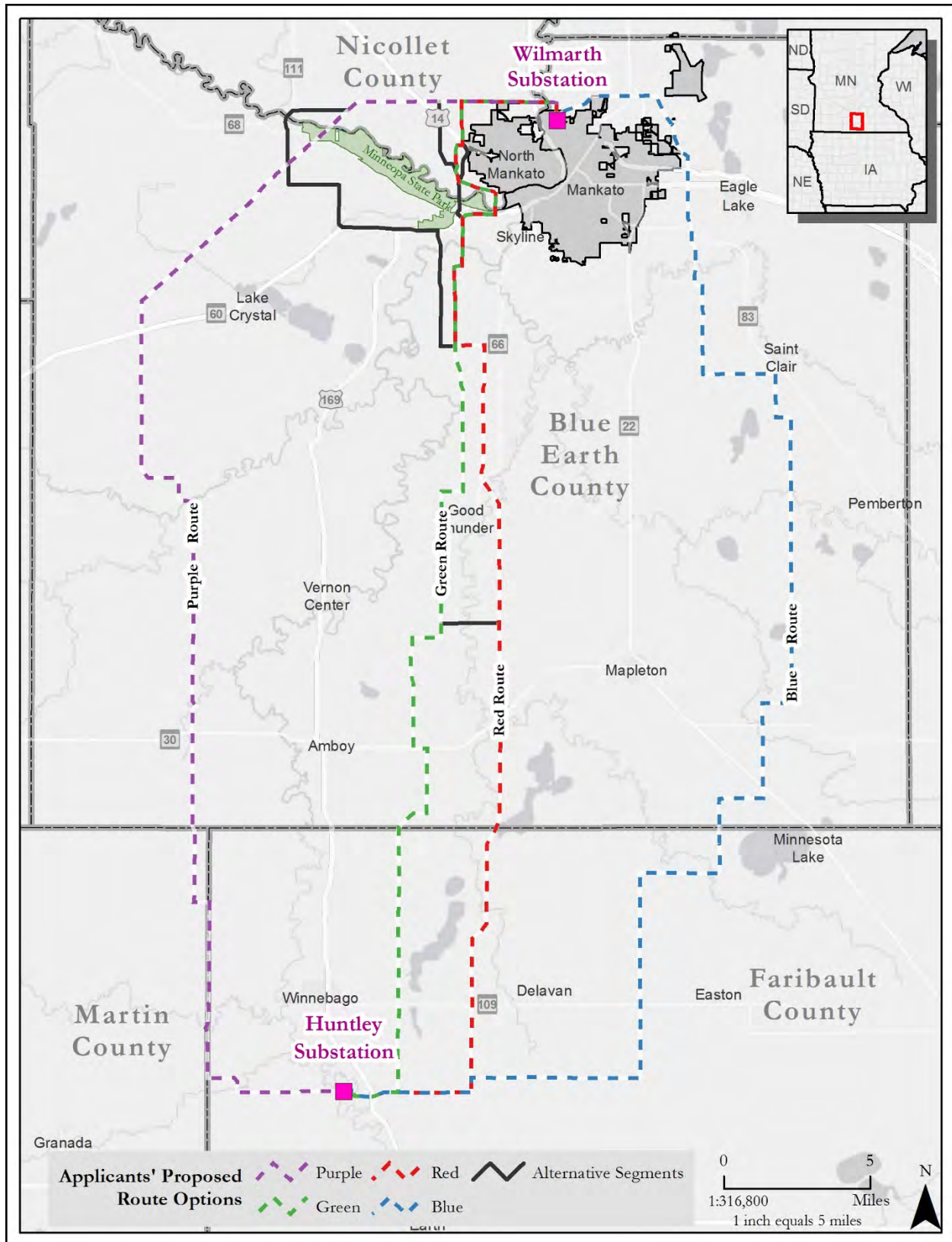
One of the newly added segments in Belgrade Township was adjusted based on public feedback and additional analysis. The adjustment created a shorter route that avoids proximity to two homes, but requires crossing approximately 3,000 feet of agricultural field where there is no current field division.

St. Clair – Additional segments were added because the eastern route near St. Clair was close to the end of a grass strip runway. New segments were added that were more compatible with existing aviation land uses.

Eagle Lake – The eastern route between Mankato and Eagle Lake was adjusted based on feedback from the City of Mankato. The route was seen as incompatible with a solar development and conflicted with future development patterns in the city (refer to Section 7.1.3 of the RPA for more information on the City of Mankato's comments).

The remaining four end-to-end routes were analyzed according to Minnesota routing criteria and are depicted in Figure E-12. The Applicants also identified four alternatives and two connector segments which are presented and analyzed in Sections 4.5 and 6.10 of the RPA. Refer to Sections 4.5 and 6.10 of the RPA for additional detail on the route segment alternatives.

Figure E-12 Final Route and Route Segment Alternative Options



APPENDIX F

Impact Table for Route Options

Appendix F

Comparison of Key Factors of Routes Considered

Environmental Features	Route Options			
	Purple Route	Green Route	Red Route	Blue Route
General				
Length (miles)	51.6	45.4	46.5	57.0
150-foot Right-of-Way (acres)	938	824	845	1,037
Estimated Construction Costs (2016\$)	\$105.8 to 137.9 million	\$109.0 to 121.3 million	\$135.2 to 138.0 million	\$123.7 to 135.8 million
Corridor Sharing				
Double-circuit Existing Transmission Line (miles)	23.1 (if double circuit)	0.8	29.4	9.6
Paralleling Existing Transmission Line (miles)	21.7 (if built parallel)	4.6	--	--
Roads and Railroads (miles)	11.7	12.4	5.6	9.4
Property and Field Lines (miles)	13.3	21.5	6.8	29.6
No Linear Feature Sharing (miles)	3.7	6.2	4.7	8.5
Total Linear Feature Sharing (miles)	48.1	39.3	41.8	48.6
Total Linear Feature Sharing (percent)	93	87	90	85
Proximity to Residences				
Number of Residences 0 to 75 feet from Application Alignments	--	--	--	--
Number of Residences 76 to 150 feet from Application Alignments	--	11	11	1
Number of Residences 151 to 300 feet from Application Alignments	7	15	20	4
Number of Residences 301 to 500 feet from Application Alignments	9	44	38	10
Total Number of Residences within 500 feet of Application Alignments	16	70	69	15
Agricultural Impacts				
Change in Number of Poles in Cropland ^a	175 to 215	120 to 195	-5 to -25 ^b	125 to 240
Prime Farmland				
Total All Categories of Prime Farmland Within 150-foot Right-of-Way (acres/percent)	713 / 76	662 / 80	697 / 83	899 / 87
Farmland of State Importance Within the 150-foot Right-of-Way (acres/percent)	118 / 13	72 / 9	55 / 7	83 / 8

Appendix F Comparison of Key Factors of Routes Considered

Environmental Features	Route Options			
	Purple Route	Green Route	Red Route	Blue Route
Land Cover				
Agricultural Land Within 150-foot Right-of-Way (acres/percent)	607 / 65	522 / 63	510 / 60	754 / 73
Wetlands Within the 150-foot Right-of-Way (acres/percent)	59 / 6	39 / 5	54 / 6	53 / 5
Grasslands Within the 150-foot Right-of-Way (acres/percent)	141 / 15	58 / 7	80 / 10	99 / 9
Forest Lands Within the 150-foot Right-of-Way (acres/percent)	27 / 3	57 / 7	50 / 6	12 / 1
Developed Areas Within the 150-foot Right-of-Way (acres/percent)	98 / 10	142 / 17	144 / 17	113 / 11
Open Water Within the 150-foot Right-of-Way (acres/percent)	6 / 1	6 / 1	7 / 1	6 / 1
Wetlands				
Total Wetlands Within the 150-foot Right-of-Way (acres/percent)	59.1 / 6	45.0 / 6	60.9 / 7	56.9 / 6
Non-Forested Wetlands Within the 150-foot Right-of-Way (acres/percent)	49.1 / 5	36.8 / 5	46.7 / 5	37.7 / 4
Forested Wetlands Within the 150-foot Right-of-Way (acres/percent)	10.0 / 1	8.2 / 1	14.2 / 2	19.2 / 2
Number of Poles in Wetlands	17	14	18	15
PWI and Shallow Lakes				
Number of Stream and River Crossings by Application Alignments	24	18	22	45
Number or PWI Stream Crossings by Application Alignments	14	8	14	17
Number of PWI Basins Within 150-foot Right-of-Way	--	1	2	--
Number of PWI Wetlands Within 150-foot Right-of-Way	--	--	--	1
Number of Shallow Lakes Within 150-foot Right-of-Way	--	1	1	1

Appendix F Comparison of Key Factors of Routes Considered

Environmental Features	Route Options			
	Purple Route	Green Route	Red Route	Blue Route
Conservation Easements and Other Designated Lands				
Number of Sites with High Biodiversity Significance Within 150-foot Right-of-Way	3	1	--	--
Number of WMAs Within 150-foot Right-of-Way	--	1	1	--
Number of WPAs Within 150-foot Right-of-Way	1	--	1	--
Number of State Parks Within 150-foot Right-of-Way	1	--	--	--
Number of T&E Species Within 1 mile of Route.	13	18	18	11
Number of State Water Trail Crossings by 150-foot Right-of-Way	2	2	2	1
Number of Snowmobile Trail Crossings by 150-foot Right-of-Way	4	2	2	5
Cultural Resources				
Number of Previously Recorded Archaeological Sites Within 1,000-foot Route Width	2	1	3	3
Number of Previously Recorded Historical Structures Within 1,000-foot Route Width	--	1	--	1
^a The number of new structures in agricultural fields depends on the design option selected (H-frame structures, monopole structures or double circuit structures). ^b Red Route results in a net decrease of structures in agricultural fields because the proposed 345 kV line has fewer structures per mile than the existing 161 kV line it would replace.				

APPENDIX G

Agency Correspondence

Federal Agencies

U.S. Army Corps of Engineers



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Meghan Brown, Project Manager
U.S. Army Corps of Engineers
La Crescent Field Office
1114 South Oak Street
La Crescent, MN 55947

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Ms. Brown:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

The project, referred to as the Huntley to Wilmarth 345 kV Project (Project), was identified by the Midcontinent Independent System Operator (MISO) as a market efficiency project to provide access to lower cost energy sources (e.g., wind energy) that currently cannot be fully utilized due to lack of adequate transmission. The Project is part of infrastructure improvements needed to allow advancement of renewable energy—particularly wind energy—in the state, throughout MISO, and nationally. Xcel Energy and ITC Midwest will co-own the new transmission line and Xcel Energy is acting as lead developer of the Project. The Project's endpoints were identified by MISO analysts specifically to allow the next increment of transmission capacity in the most efficient way.

Xcel Energy is in the process of evaluating route alternatives within the study area based on analysis of publicly available data that minimize socioeconomic and environmental impacts, maximize co-location with other infrastructure, and satisfy regulatory routing and facility siting requirements. Xcel Energy identified many potential route options within a large study area in order to obtain agency and public input to support the route selection process. Field review of final route alternatives are in the process of being conducted to clarify or confirm potential route issues or constraints. The attached map depicts the study area for the proposed Project and presents a selection of preliminary route options. If you prefer to review the data in a GIS shapefile format, please let us know and we will

Xcel Energy intends to file a Certificate of Need (CON) and Route Permit (RP) Application by the end of 2017, in accordance with Minnesota Rules (Minn. R.) 7849 and Minn. R. 7850 respectively, to the Minnesota Public Utilities Commission (PUC) for the Project. As part of this process, Xcel Energy is conducting public meetings and stakeholder outreach, as well as coordinate with applicable regulatory and government offices. We appreciate your assistance as we evaluate siting and routing information and work through the PUC's approval process. Please let us know if you have information we should consider in evaluating routes.

If you prefer to review the routes Xcel Energy is studying in a GIS shapefile format, or if you have questions and would like additional information about the proposed Project, please contact me at Thomas.Hillstrom@xcelenergy.com or (612) 330-5835.

Sincerely,

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map

U.S. Department of Agriculture

From: [Hillstrom, Thomas G](#)
To: [Naomi Christenson](#)
Subject: Fwd: Huntley to Wilmarth Transmission Line
Date: Thursday, September 28, 2017 7:41:57 AM

FYI

Begin forwarded message:

From: "Oja, Mark - NRCS, St. Paul, MN" <Mark.Oja@mn.usda.gov<<mailto:Mark.Oja@mn.usda.gov>>>
Date: September 28, 2017 at 7:34:06 AM CDT
To: "Hillstrom, Thomas G" <Thomas.Hillstrom@xcelenergy.com<<mailto:Thomas.Hillstrom@xcelenergy.com>>>
Subject: RE: Huntley to Wilmarth Transmission Line

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Tom

Correct, FPPA would only apply if Federal Funds are utilized.

From: Hillstrom, Thomas G [<mailto:Thomas.Hillstrom@xcelenergy.com>]
Sent: Wednesday, September 27, 2017 4:03 PM
To: Oja, Mark - NRCS, St. Paul, MN <Mark.Oja@mn.usda.gov<<mailto:Mark.Oja@mn.usda.gov>>>
Subject: RE: Huntley to Wilmarth Transmission Line

Mark,

Thank you for the letter. The link to the easement mapping site is very helpful.

Regarding the Farmland Policy Protection Act, our project will not use any federal funding nor will it be subject to a NEPA review. It is our understanding that the FPPA would not apply to the project and that Form AD-1006 would not be required. Can you confirm that?

Thank You

Tom Hillstrom
Xcel Energy | Responsible By Nature
Principal Permitting Agent
414 Nicollet Mall, 414-6A Minneapolis, MN 55401
P: 612 330 5835 C: 612 584 8783
E: thomas.hillstrom@xcelenergy.com<<mailto:thomas.hillstrom@xcelenergy.com>>

From: Oja, Mark - NRCS, St. Paul, MN [<mailto:Mark.Oja@mn.usda.gov>]
Sent: Wednesday, September 27, 2017 8:47 AM
To: Hillstrom, Thomas G
Subject: Huntley to Wilmarth Transmission Line

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the Phishing page on XpressNET.

Mr. Hillstrom:

Attached please find MN - NRCS comments relative to your project proposal. There are a number of NRCS administered permanent easements that may be impacted by your proposed project depending on the final selection of the route. NRCS supports a public access website (link attached in the response letter) which identifies the location of these easements to aid in your evaluation of proposed routes.

Regards

Mark Oja

Wildlife Biologist

USDA-NRCS

Suite 600

375 Jackson St.

St. Paul, MN 55101

P) 651.602.7868

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September 20, 2017

Mr. Thomas Hillstrom
Principal Permitting Agent
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
Thomas.Hillstrom@xcelenergy.com

IN REPLY REFER TO: Huntley to Wilmarth Transmission Line Project

Dear Mr. Hillstrom:

The Natural Resources Conservation Service (NRCS) has reviewed the above referenced Project. Our review indicates several NRCS administered permanent easements are located within the proposed project area and may be impacted by your project. Locations of NRCS administered easements can be found at the following website:

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/dma/?cid=stelprdb1043930>

Finally, if as a result of your proposal, agricultural lands may be permanently affected, it is a requirement that a Farmland Policy Protection Act (FPPA) site assessment be appropriately filed. Because of the location and type of activity proposed, this project may, dependent on final location siting, permanently impact agricultural lands.

Once final locations have been identified please submit a Farmland Conversion Impact Rating form (Form AD-1006) for each of the individual sites in question with part one filled out.

FPPA land evaluations are conducted by local NRCS personnel who review the project for possible effects on unique, prime or statewide important farmland. You can find the FPPA form AD-1006 at <http://www.nrcs.usda.gov/wps/portal/nrcs/main/national/landuse/fppa/>.

Our agency appreciates your thorough follow up on the environmental review requirements of this project.

Sincerely,



RYAN GALBREATH

Environmental Review and Justice Program

cc: Gary Watson, Assistant State Conservationist, (Field Operations), NRCS, Marshall, MN



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

David Hauga
Chair
USDA FSA Minnesota State Office
375 Jackson Street, Suite 400
St. Paul, MN 55101

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear David Hauga:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

The project, referred to as the Huntley to Wilmarth 345 kV Project (Project), was identified by the Midcontinent Independent System Operator (MISO) as a market efficiency project to provide access to lower cost energy sources (e.g., wind energy) that currently cannot be fully utilized due to lack of adequate transmission. The Project is part of infrastructure improvements needed to allow advancement of renewable energy—particularly wind energy—in the state, throughout MISO, and nationally. Xcel Energy and ITC Midwest will co-own the new transmission line and Xcel Energy is acting as lead developer of the Project. The Project's endpoints were identified by MISO analysts specifically to allow the next increment of transmission capacity in the most efficient way.

Xcel Energy is in the process of evaluating route alternatives within the study area based on analysis of publicly available data that minimize socioeconomic and environmental impacts, maximize co-location with other infrastructure, and satisfy regulatory routing and facility siting requirements. Xcel Energy identified many potential route options within a large study area in order to obtain agency and public input to support the route selection process. Field review of final route alternatives are in the process of being conducted to clarify or confirm potential route issues or constraints. The attached map depicts the study area for the proposed Project and presents a selection of preliminary route options. If you prefer to review the data in a GIS shapefile format, please let us know and we will

Xcel Energy intends to file a Certificate of Need (CON) and Route Permit (RP) Application by the end of 2017, in accordance with Minnesota Rules (Minn. R.) 7849 and Minn. R. 7850 respectively, to the Minnesota Public Utilities Commission (PUC) for the Project. As part of this process, Xcel Energy is conducting public meetings and stakeholder outreach, as well as coordinate with applicable regulatory and government offices. We appreciate your assistance as we evaluate siting and routing information and work through the PUC's approval process. Please let us know if you have information we should consider in evaluating routes.

If you prefer to review the routes Xcel Energy is studying in a GIS shapefile format, or if you have questions and would like additional information about the proposed Project, please contact me at Thomas.Hillstrom@xcelenergy.com or (612) 330-5835.

Sincerely,

A handwritten signature in black ink, appearing to read "T Hillstrom". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'H'.

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Cathee Pullman
State Conservationist
USDA Natural Resource Conservation Service
375 Jackson Street
Suite 600
St. Paul, MN 55101-1854

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Cathee Pullman:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Sincerely,

A handwritten signature in black ink, appearing to read "T Hillstrom". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'H'.

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map

U.S. Fish and Wildlife Service

Huntley-Wilmarth
Phone conference with Mike Malling and Gerry Schimek (USFWS) 9am August 8, 2017

Xcel Energy staff: Chris Rogers and Tom Hillstrom

This call was set up to discuss routing through the Roberts, Nelson and Altenburg WPA's. Roberts and Nelson WPA's both have existing NSP transmission lines on them with easements predating Federal ownership. Both are being considered as route options for the new 345kV line, either as double circuit with the existing line. The Altenburg WPA does not have existing lines or easements and is along a new route being considered.

Mike and Gerry agreed that new lines proposed through the Roberts and Nelson WPA's would be acceptable as long as we stay within the existing easement and comply with the terms. Roberts WPA existing easement is 75' wide (Line 5300) and Nelson WPA existing easement is 150' wide (Line 0982). Copies of the existing easements were provided to Mike.

Although the proposed new route through the Altenburg WPA would only involve overhang of wires over the driveway, Mike and Gerry discouraged the concept and stated that approval would be unlikely.

Xcel Energy
Huntley Wilmarth 345 kV Transmission Line Project
US Fish and Wildlife Service Project Introduction
August 15, 2017

Attendees

Andrew Horton, US Fish and Wildlife Service (USFWS) – Twin Cities Ecological Services Field Office

Todd Luke, USFWS - Windom Wetland Management District

Tom Hillstrom, Xcel Energy

Chris Rogers, Xcel Energy

Naomi Christenson, Merjent

Andrea Sampson, Merjent

Meeting Highlights

- Tom Hillstrom introduced the project describing that it is a Midcontinent Independent System Operator (MISO) market efficiency project to provide access to lower cost energy sources (e.g., wind energy).
- Tom presented the route options, first generally, and then as they relate to USFWS lands. He specifically described each route and the potential intersections with the Roberts Waterfowl Production Area (WPA), the Nelson WPA, the Altenburg WPA, and the Prescott WPA. Route adjustments have been made to avoid these areas to the extent practicable based on previous input from USFWS staff at the Minnesota Valley Wildlife Refuge (Mike Malling, Gerry Shimek) and the Windom Wetland Management District (Todd Luke). Tom explained that given the restricted space along Xcel's existing easements through the Roberts and Nelson WPAs, it is likely that the lines would be a double circuit (as opposed to parallel) if selected as the final route. Andrew asked about the additional height that might add to the lines; Tom stated it could be as much as 50-60 feet above the existing line. Andrew commented that that may increase the possibility of bird strikes, and diverters and other mitigation measures may be needed. Tom indicated that Xcel typically references Avian Powerline Interaction Committee (APLIC) guidance to develop Xcel's Avian Protection Plan (APP) to direct bird diverter installation.
- Tom also discussed the route options at Minneopa State Park and shared some of the discussion that has been had with the Minnesota Department of Natural Resources (MN DNR) regarding this crossing. Andrew Horton asked about the height of the lines at the potential middle ("greenfield") crossing; would they be in the tree line or above? He recommended keeping lines as low as possible (i.e., level with/staying in the tree line) to reduce the possibility of bird strikes and eagle disturbance. Tom indicated Xcel prepared a draft engineering plan to present to the MN DNR showing the middle crossing of the park, and agreed to send to Andrew Horton as well.

- Andrew stated that Gerry and Mike would be the appropriate staff who would need to make the final decision on the crossing of USFWS easements, and he noted that flight diverters would likely be required in areas adjacent to these areas.
- Federally listed threatened and endangered species in the project Study Area are limited to the northern long-eared bat (NLEB; found throughout the Study Area), the prairie bush clover (found only in Martin County), and the rusty patched bumble bee. Andrew noted that there are no known roost trees or hibernacula in the area associated with the northern long-eared bat, and as such, the project would likely be covered under the 4(d) rule. Ideally, tree clearing would be conducted between October 1 and March 31 to avoid impacts to bats. If that is not possible, clearing could be done during the active season, and incidental take could be covered by the programmatic biological opinion for the species using the NLEB streamlined consultation process and form. The prairie bush clover only occurs in areas of high quality prairie, and Andrew wasn't overly concerned about impacts to the species; most of the Study Area in Martin County is associated with agricultural land cover, and suitable habitat for the species is likely not present.
- Andrew noted that a new record for the rusty patched bumble bee has just been submitted to the USFWS that falls within the project Study Area (this record is not yet in the shapefiles provided by the USFWS). He presented a preliminary map of the high potential zone associated with this occurrence, and the review confirmed that it overlaps a portion of the Middle 161 East route. In reviewing the likely overlap between the high potential zone and the Middle 161 East potential route option, it appears that suitable habitat for this species may not be present.
- The meeting adjourned with agreement to share the route options in a shapefile format with Andrew Horton.

Tribal Correspondence



LEECH LAKE BAND OF OJIBWE

Tribal Historic Preservation Office

*Amy Burnette, Tribal Historic Preservation Officer
Sheila Gotchie, Office Manager*

September 26, 2017

Xcel Energy
ATTN: Thomas Hillstrom, Principal Permitting Agent
414 Nicollet Mall
Minneapolis, MN 55401

RE: 345k V Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin Counties, Minnesota
LL THPO No. 17-350-NCRI

Dear Mr. Hillstrom,

Thank you for the opportunity to comment on the above-referenced project. It has been reviewed pursuant to the responsibilities given the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992 and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation; after careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any known recorded sites of religious or cultural importance in these areas.

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately in this order: County Sheriff's Office and Office of the State Archaeologist. If any human remains or culturally affiliated objects are inadvertently discovered this will prompt the process to which the Band will become informed.

Please note: The above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying us of concerns for a specific project, we may re-enter into the consultation process.

You may contact me at (218) 335-2940 if you have questions regarding our review of this project. Please refer to the LL-THPO Number as stated above in all correspondence with this project.

Respectfully submitted,

Amy Burnette

Tribal Historic Preservation Officer



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Cathy Chavers - Tribal Chair
Bois Forte Band of Chippewa
5344 Lakeshore Drive
Nett Lake, MN 55772**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Cathy Chavers:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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If you prefer to review the routes Xcel Energy is studying in a GIS shapefile format, or if you have questions and would like additional information about the proposed Project, please contact me at Thomas.Hillstrom@xcelenergy.com or (612) 330-5835.

Sincerely,

A handwritten signature in black ink, appearing to read "T Hillstrom". The signature is written in a cursive, flowing style.

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Kevin DuPuis - Chairman
Fond Du Lac Reservation
1720 Big Lake Rd.
Cloquet, MN 55720**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Kevin DuPuis:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

The project, referred to as the Huntley to Wilmarth 345 kV Project (Project), was identified by the Midcontinent Independent System Operator (MISO) as a market efficiency project to provide access to lower cost energy sources (e.g., wind energy) that currently cannot be fully utilized due to lack of adequate transmission. The Project is part of infrastructure improvements needed to allow advancement of renewable energy—particularly wind energy—in the state, throughout MISO, and nationally. Xcel Energy and ITC Midwest will co-own the new transmission line and Xcel Energy is acting as lead developer of the Project. The Project's endpoints were identified by MISO analysts specifically to allow the next increment of transmission capacity in the most efficient way.

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Sincerely,

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Norman W. Deschampe - Chairman
Grand Portage Band of Chippewa Indians
P.O. Box 428
Grand Portage, MN 55605**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Norman W. Deschampe:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

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Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Faron Jackson, Sr. - Chairman
Leech Lake Band of Ojibwe
190 Sailstar Drive NW
Cass Lake, MN 56633**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Faron Jackson, Sr.:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



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Minneapolis, MN 55401

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Xcelenergy.com

September 8, 2017

**Robert Larsen - Chairman
Lower Sioux Indian Community
39527 Res. Highway 1, P.O. Box 308
Morton, MN 56270**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Robert Larsen:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

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Xcelenergy.com

September 8, 2017

**Tribal Government
Mille Lacs Band of Ojibwe
43408 Oodena Dr
Onamia, MN 56359-2236**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Tribal Government:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Deborah McCoy - Tribal Council's Administrative Assistant
Prairie Island Indian Community
5636 Sturgeon Lake Road
Welch, MN 55089**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Deborah McCoy:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
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414 Nicollet Mall
Minneapolis, MN 55401

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Xcelenergy.com

September 8, 2017

**Darrell G. Seki, Sr. – Chairman
Red Lake Band of Chippewa Indians
15484 Migizi Drive
Red Lake, MN 56671**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Darrell G. Seki, Sr.:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Charles Vig – Chairman SMSC Business Council Chairman
Shakopee Mdewakanton Sioux (Dakota) Community
2330 Sioux Trail NW
Prior Lake, MN 55372**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Charles Vig:

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September 8, 2017

**Kevin Jensvold – Chairman
Upper Sioux Community
5722 Travers Lane, P.O. Box 147
Granite Falls, MN 56241**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Kevin Jensvold:

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September 8, 2017

**Terrence "Terry" Tibbetts - Chairman
White Earth Reservation
P.O. Box 418
White Earth, MN 56591**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Terrence "Terry" Tibbetts:

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

September 8, 2017

**Kevin DuPuis – MCT President
Minnesota Chippewa Tribe (MCT)
15542 State Hwy 371 NW
Cass Lake, MN 56633**

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Kevin DuPuis:

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Enclosure: Project Location Map

State Agencies

Minnesota Board of Soil and Water Resources

Xcel Energy
Huntley Wilmarth 345 kV Transmission Line Project
BWSR Meeting –BWSR RIM Easement Crossing
May 31, 2017

Meeting Attendees:

Tom Hillstrom (Xcel)	Chris Rogers(Xcel)	Jennifer Kamm (Merjent)
Bill Penning (BWSR)	Tim Fredbo(BWSR)	

Meeting Highlights:

The purpose of the meeting was to engage the Minnesota Board of Soil and Water Resources (BSWR) and identify the feasibility and permitting process for crossing lands enrolled in Reinvest In Minnesota (RIM) or other BWSR easement programs.

- Tom Hillstrom introduced the project describing it's purpose and need, the notice area and preliminary route options. In summary (1.) the Huntley to Wilmarth project is a market efficiency project identified by MISO (2.) the PUC and DOC will be reviewing a Certificate of Need (CON) and Route Permit Application (3.) The state will then prepare an EIS (4.) Xcel is early in the routing process and is seeking public and agency input to determine possible routes for the project, and (5.) Public open houses will be held for the project June 20-21, 2017.
- Tom gave an overview of the Minnesota Public Utilities Commission (PUC) permitting process which allows for significant stakeholder input. The Minnesota Department of Commerce (DOC) - Energy Environmental Review and Analysis (EERA) unit implements the PUC process and will conduct an environmental review, including a scoping process where the public can offer route options for study.
- Prior to the Route Permit and Certificate of Need application submittals, Xcel will conduct public outreach in the project's study area. Tom described Xcel's approach to routing a new project; identifying many routes to start and winnowing down as the review and outreach progresses. This builds a good project record for the PUC and adds to the credibility of the process.
- Tom presented the following two route options which cross RIM easements and requested BWSR's opinion on feasibility of permitting and compatibility with the existing RIM easements.

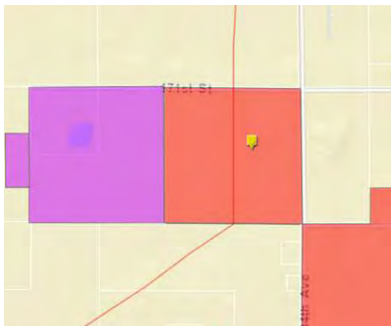
Area 1

Xcel's easement for its line 5549, depicted below in Nicollet County just north of the Minnesota River, is 75 feet wide and predates two state BWSR easements.



Area 2

The west route option follows Xcel's existing line 0982 and has a 150-foot-wide easement on the Blue Earth County side of the Minnesota River. Xcel's easement rights also predate the RIM easement and Notice of Grant Requirements.



- Bill and Tim agreed that Xcel's easement rights predate the RIM easements and would over-ride the RIM easement for both the above areas. Where Xcel's easement predates BWSR easements or ownership, Xcel is superior to them. Where Xcel doesn't have any existing rights for new routes, we are subject to their rights. For these areas, they will have to assess our impacts and decide if they'll allow us to be there. Mitigation may be required or alteration of their easement would be the worst-case scenario.
- Bill stated that these two easements do not have a federal partnership and are solely under the purview of the state. Bill noted that easements that have a federal partnership (e.g., FWS or NRCS) are under the authority of the respective federal agency and the BWSR defers easement negotiations to the federal agency.
- Bill and Tim stated that the BWSR would provide the PUC with their list of conditions which would be incorporated into the CON/Route Permit.

- Bill and Tim gave us a copy of their “Conservation Easement Alteration Requests and Board Policy” and directed us to the first section on the back side “Public Initiated Projects (public road and utility projects etc.) This policy is attached to this document. They indicated that they would evaluate the project for compatibility with the conservation plan developed by the Soil and Water Conservation District for the easement. If it was determined that there was a minimal impact, BWSR would require no additional action. If there was a substantial impact, BWSR would use the policy direction.
- In the case of Area 1, BWSR stated that because of the existing transmission line and because land cover is herbaceous, lacking significant tree cover that would require maintenance, a new line may not have a substantial impact.
- Tim stated that the BWSR would request mitigation for impacts to RIM easements rather than relinquishing the easement. Impacts may include bird strike and temporary disturbance of cover. Mitigation might include adding bird strike protection on the lines, pole design, ROW maintenance (e.g., mowing) and using RIM appropriate construction restoration (e.g., seed mixes).
- Bill stated that flowage easements are not under BWSR purview and that DNR Lands and Minerals would be the contact for those types of easements. The DNR website is updated quarterly with flowage easements that have been finalized (now current as of January 1).
- Tim Fredbo stated that he will be the point of contact for BWSR coordination.

Action Item:

Add Tim Fredbo to public meeting invitation list.

Conservation Easement Alteration Requests and Board Policy

RIM Reserve Rule Affecting Alteration Requests

8400.3610 Alteration, Release or Termination of Conservation Easements

The state board may alter, release, or terminate a conservation easement after consultation with the commissioners of agriculture and natural resources. The board may alter, release, or terminate an easement only if the state board determines that the public interests and general welfare are better served by the alteration, release, or termination.

The state board must be provided the following information at least 30 days prior to a state board meeting, before the state board will consider a request to alter, release, or terminate a conservation easement:

- A. a copy of the letter from the landowner to the district board justifying the change and identifying how the public interest and general welfare will be better served;
- B. a letter from the district board recommending either approval or disapproval of the proposed change;
- C. a letter from the Department of Natural Resources area wildlife manager recommending either approval or disapproval of the proposed change; and
- D. other supporting documents, including:
 - 1) an aerial photo identifying the requested change;
 - 2) a soil survey map of the area;
 - 3) cropping history information; and
 - 4) other pertinent documentation that will support the request.

The state board reserves the right to require special provisions to ensure at least equal resource value as a condition of approving the request. The state board must be compensated by the landowner for all damages and loss of benefits to the conservation easement and the state board may also require reimbursement for administrative expenses and costs incurred in the alteration, release, or termination of a conservation easement.

Policy Developed by Easement Alteration Subcommittee and adopted by the BWSR on 5-24-06

This policy applies to all state RIM, PWP and CREP easements currently in place and all future state conservation easement acquisitions.

All easement alteration requests that come to BWSR will be accompanied by a \$500 processing fee. Checks should be made payable to the BWSR. For alterations where actual costs to amend the easement exceed \$500 the state reserves the right to charge the applicant the actual cost.

Public initiated projects (public road and utility projects, etc.)

Easement staff has the authority to tentatively approve of releases for public infrastructure projects. However, releases are not considered final until after the release request is presented to and approved by the Board and all fees have been paid.

In addition to the fee as outlined above, public entities must pay:

- 1) Two times the current average township assessed market value (ATAMV) for acres released, and
- 2) An amount equal to all state funds dispersed as reimbursement for costs incurred to establish cover on the land being released.

Private landowner requests

All alteration requests that come to the BWSR must contain all the information items requested in Section 8400.3610 of RIM Reserve Rule (items A – D as listed above), plus the \$500 processing fee in the form of a check made payable to the BWSR.

All requests must also meet the following conditions for BWSR approval:

- 1) Replacement acres will increase by a minimum factor of 2:1 (replacement acres to released acres). Replacement acres proposed on easements must meet crop history requirements, cropped 2 of last 5 years, if land proposed for release was cropland at the time the easement was granted.
- 2) The resource protection and habitat benefits of the original easement will remain the same or be enhanced by the proposed alteration. For example;
 - restored wetland acres will not be drained or filled by the proposal
 - riparian buffers will be preserved or enhanced
 - easement configuration will preserve or enhance wildlife benefits (larger blocks of habitat, not fractured puzzle-like boundaries).
- 3) The SWCD Board and/or the DNR Area Wildlife Manager approve of the proposed alteration.
- 4) Landowners will be required to pay necessary title insurance and recording fees, and all costs associated with establishment of conservation cover practices on replacement acres according to an approved conservation plan.
- 5) Any alteration proposed would not allow or enable any land development projects to occur on lands currently under easement. Land development projects include, but are not limited to, such things as new homes, cabins, storage buildings, livestock facilities, cell phone towers, wind generators, sewage treatment systems, private roads and drives, and mining operations.

Meeting the criteria outlined above for private requests does not guarantee that the Board will approve of the request for release and alteration of a conservation easement.

Minnesota Department of Agriculture

Xcel Energy
Huntley Wilmarth 345 kV Transmission Line Project
MN Department of Agriculture Meeting
December 19, 2017

Attendees

Bob Patton, Minnesota Department of Agriculture (MDA)
Steve Roos, MDA
Tom Hillstrom, Xcel Energy
Brian Udell, Xcel Energy
Dan Hagan, ITC Midwest
Naomi Christenson, Merjent

Meeting Highlights

- Tom Hillstrom introduced the Project describing that it is a Midcontinent Independent System Operator (MISO) market efficiency project to provide access to lower cost energy sources (e.g., wind energy). ITC Midwest and Xcel Energy (Xcel) will be co-owners, but Xcel is taking the lead on permitting the Project.
- Bob Patton indicated that Steve Roos will be transitioning into the agricultural mitigation role. He noted that although there is no regulation, they typically focus agricultural review and mitigation on 345 kV and larger projects.
- Hillstrom described the process used to present agricultural impacts in the Route Permit Application (e.g., pole spotting technology). The group also discussed whether or not there is a difference between placing a pole in the middle of the field verses along a road (i.e., is it the same level of inconvenience to the farmer). Patton and Roos were unsure if there was a strategy on this, but agreed to research this within the MDA.
- Patton and Roos confirmed the need for an Agricultural Mitigation Plan and provided a couple examples the companies have used in the past to review and adapt.
- Patton noted that heavy storms are trending upward and damages have been more frequent. Hillstrom described the use of mat roads and how they are becoming more commonplace and increase overall efficiency.
- Roos indicated that the access to the pole locations is another main concern and sometimes overlooked. Hillstrom indication that landowners are reimbursed for any damages associated with crops, drain tiles, and access road compaction issues.
- Hillstrom described the idea that the environmental monitor's duties often overlap with an agricultural monitor and the companies believe it may be more efficient to rely solely on the environmental monitor. Patton agreed this could be an option as long the monitor was third party and has pertinent qualifications (e.g., soil science background).

Action Items

<i>Action No.</i>	<i>Action Item</i>	<i>Assigned To</i>	<i>Due Date</i>
1	Prepare a Draft Agriculture Impact Mitigation Plan and send it to Bob and Steve	Xcel / ITC	Spring
2			
3			



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Robert Patton
Supervisor, Energy and Environment Section
Minnesota Department of Agriculture
625 Robert Street North
Saint Paul, MN 55155-2538

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Robert Patton:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

The project, referred to as the Huntley to Wilmarth 345 kV Project (Project), was identified by the Midcontinent Independent System Operator (MISO) as a market efficiency project to provide access to lower cost energy sources (e.g., wind energy) that currently cannot be fully utilized due to lack of adequate transmission. The Project is part of infrastructure improvements needed to allow advancement of renewable energy—particularly wind energy—in the state, throughout MISO, and nationally. Xcel Energy and ITC Midwest will co-own the new transmission line and Xcel Energy is acting as lead developer of the Project. The Project's endpoints were identified by MISO analysts specifically to allow the next increment of transmission capacity in the most efficient way.

Xcel Energy is in the process of evaluating route alternatives within the study area based on analysis of publicly available data that minimize socioeconomic and environmental impacts, maximize co-location with other infrastructure, and satisfy regulatory routing and facility siting requirements. Xcel Energy identified many potential route options within a large study area in order to obtain agency and public input to support the route selection process. Field review of final route alternatives are in the process of being conducted to clarify or confirm potential route issues or constraints. The attached map depicts the study area for the proposed Project and presents a selection of preliminary route options. If you prefer to review the data in a GIS shapefile format, please let us know and we will

Xcel Energy intends to file a Certificate of Need (CON) and Route Permit (RP) Application by the end of 2017, in accordance with Minnesota Rules (Minn. R.) 7849 and Minn. R. 7850 respectively, to the Minnesota Public Utilities Commission (PUC) for the Project. As part of this process, Xcel Energy is conducting public meetings and stakeholder outreach, as well as coordinate with applicable regulatory and government offices. We appreciate your assistance as we evaluate siting and routing information and work through the PUC's approval process. Please let us know if you have information we should consider in evaluating routes.

If you prefer to review the routes Xcel Energy is studying in a GIS shapefile format, or if you have questions and would like additional information about the proposed Project, please contact me at Thomas.Hillstrom@xcelenergy.com or (612) 330-5835.

Sincerely,

A handwritten signature in black ink, appearing to read "T Hillstrom". The signature is written in a cursive, flowing style.

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map

Minnesota Department of Natural Resources

Xcel Energy
Huntley Wilmarth 345 kV Transmission Line Project
MN Department of Natural Resources
December 19, 2017

Attendees

Cynthia Warzecha, Minnesota Department of Natural Resources (MDNR)
Kevin Mixon, MDNR
Ray Kirsch, Minnesota Department of Commerce
Tom Hillstrom, Xcel Energy
Brian Udell, Xcel Energy
Dan Hagan, ITC Midwest
Naomi Christenson, Merjent

Meeting Highlights

- Tom Hillstrom gave an update on outreach and project schedule.
- Kevin Mixon noted there is quality mature forested areas when looking down from the bluff. The MDNR is not yet sure what their position will be on that route if asked by the Commission. There is a question as to what the mitigation proposal would be and indicated it would be better to prepare a proposal for their review earlier than later.
- Ray Kirsch stated that the Minnesota Public Utilities Commission (MPUC) would need to review as well since the mitigation would affect the overall project costs.
- The group reviewed the areas where the MDNR previously requested minor route variations (refer to September 14, 2017 meeting notes).
 - Smith WMA crossing – will update route if necessary to avoid crossing lake and be as close to the road as possible.
 - Cottonwood Lake – will update route and shift slightly to the east to stay out of trees
 - Pick WMA – no change; MDNR agrees
 - Alternative Connector Segment E – will shift route to avoid crossing the lake
 - Purple Route (Willow Creek Crossing) – reviewing with engineering to avoid additional river crossing.
- The group discussed potential viewshed issues associated with the state park alternative segment. Are there areas in the park that would be important to viewshed areas? MDNR will review.
- Hillstrom requested clarification from MDNR on acceptable vegetation management in the park. Would the Company have the ability to prune, clear problem trees or girdle if necessary? NERC very strict on keeping wires clear of trees.
- Mixon noted that the Park managers are not going to be acceptable with a loose agreement or conditions for vegetation management in the park. Hillstrom suggested the idea of leaving a tree after it's felled? The group agreed it could provide snag habitat and that would be preferable to impacts on the slope down to the river.
- The group agrees another meeting in New Ulm with the Park managers is the next step.

Xcel Energy
Huntley Wilmarth 345 kV Transmission Line Project
MN DNR Parks Meeting – Minneopa State Park Crossing
May 23, 2017

Attendees

Kevin Mixon, Minnesota Department of Natural Resources (DNR)
Molly Trannel-Nelson, MN DNR - Division of Parks and Trails
Craig Beckman, MN DNR - Division of Parks and Trails
Tom Hillstrom, Xcel Energy
Dan Hagan, ITC
Naomi Christenson, Merjent

Meeting Highlights

- Tom Hillstrom introduced the project describing that it is a Midcontinent Independent System Operator (MISO) market efficiency project to provide access to lower cost energy sources (e.g., wind energy).
- Craig Beckman asked why power flows north to the metro area when it's being captured in the southern portion of the state. Tom explained that it is based on the load needs on the grid and that power flows from where its generated to where it's needed.
- Tom gave an overview of the Minnesota Public Utilities Commission (PUC) permitting process which allows for significant stakeholder input. The Minnesota Department of Commerce (DOC) - Energy Environmental Review and Analysis (EERA) unit implements the PUC process and will conduct an environmental review, including a scoping process where the public can offer route options for study.
- Prior to the Route Permit and Certificate of Need application submittals, Xcel will conduct public outreach in the project's study area. Tom described Xcel's approach to routing a new project; identifying many routes to start and winnowing down as the review and outreach progresses. This builds a good project record for the PUC and adds to the credibility of the process.
- Tom presented the route options that cross Minneopa State Park, specifically describing the western route along Xcel's existing transmission line and the middle route crossing a narrow stretch of the park's statutory boundary. He identified the purpose of the meeting being to discuss Xcel's plans to depict these two routes on the public open house invitation as well as at the public meetings on poster boards. He also stated Xcel's understanding of the DNR's position of authority with regards to the state park crossing, outlining many ways in which they could participate or require mitigation (PUC and LAWCON processes, testimony submittal, etc.), and encouraged them to think about studying the middle route and the opportunity for mitigation for impacts to parkland

- Molly Trannel-Nelson described their resource assessment process which includes analyzing impacts on cultural resources and rare biological features in the area. She indicated that there are known cultural resources in the area as well as a recently discovered historic district near the study area (the buffalo range within Minneopa Park). Molly indicated she could provide a map. There are no rare features in the SHPO database; however, it's suspected that is due to the lack of survey. Kevin Mixon also mentioned an Important Bird Area (IBA) and that there are many seeps and rare plant communities in the general area and they would likely expect an evaluation for calcareous fens.
- Craig asked what kind of ground disturbance and tree removal there would be on state park land. Tom explained there would likely be a 150-foot-wide corridor that would be cleared and maintained for reliability and there would be a pole placed every 800 to 1,000 feet. The DNR requested clarification and preliminary engineering specifications to show where the pole(s) would be on the parkland and how much clearing would be needed, if any. The possibility of spanning over parkland and minimizing tree clearing was discussed. These options were preferred by DNR.
- One of the DNR's biggest concerns is the use of chemicals to control growth along the transmission line right-of-way and invasive species. Tom described Xcel's integrated vegetation management plans associated with their pollinator initiative, which can include spot treatment of invasive species, and that habitat enhancement is the goal. The DNR asked if Xcel would have a vegetation management plan for the park. Tom responded that it is typically a condition in the PUC Route Permit.
- The DNR indicated they do not object to showing the middle route on the public open house invitation due to the scale of the map. Tom and Dan agreed to share the poster boards with the DNR for their review prior to displaying at the public open houses.

Action Items

<i>Action No.</i>	<i>Action Item</i>	<i>Assigned To</i>	<i>Due Date</i>
1	Review location of IBA	Merjent	6/2/17
2	DNR to provide map of cultural historic district	Molly Trannel-Nelson	6/9/17
3	Xcel to provide preliminary engineering specifications for pole placement and clearing requirements across middle route through the park.	Xcel - TBD	6/9/17
4			
5			
6			
7			
8			
9			
10			

Huntley – Wilmarth Project

MN DNR Meeting

When: 2/17/17 @ 10:30

Attendees

- Xcel Energy: Tom Hillstrom, Siting & Land Rights;
- DNR: Cynthia Warzecha, Environmental Review, Kevin Mixon, Env Assessment Ecologist

Topic: Xcel Energy introduced the upcoming Huntley-Wilmarth project and looked for feedback in routing options, generally and specifically at Minneopa State Park

Notes

Tom described project backgroundorigin and need

MISO generator dispatch

Wind is cheapest but transmission constrained

Project needed to transmit wind power toward Twin Cities

Kevin and Cynthia were familiar with PUC process and agreed that it is a good process. They both knew how to be involved.

Tom described our pre-application process starting with stakeholder outreach and the plan for public involvement with our schedule assuming that we would develop several routes and present them to public for feedback this spring.

We used google earth to look at the project area and discuss potential routing options. Discussion narrowed in to Minneopa State park boundary (statutory boundary vs. State ownership). Tom showed several route options crossing through or near Minneopa state park.

Cynthia and Kevin could not provide definitive answers as to whether routes through state park would be permissible and suggested we submit a memo outlining specifics and they would take the subject up with their management.

Memo should include

1. Project background
2. Brief, preliminary routing considerations
3. Examples of state park crossings
 - a. Example of route crossing narrow park land near pipeline terminal
 - b. Example of route crossing private land within statutory park boundary
 - c. Route crossing park land on utility easement
4. Introduction of the concept of a mitigation fund for crossing parkland (Xcel's idea)

Tom encouraged having us attend management meetings to provide project context

Other Notes

- Kevin suggested we check on current status of BWSR easements, they may be expired
- State recently acquired some parcels in park boundary, Kevin thought that one parcel I showed as private had been acquired.
- Lisa Joyal (DNR endangered species) did not attend. We discussed briefly how we would use DNR / NHI databases to inform our routing decisions regarding endangered species.

Xcel Energy
Huntley-Wilmarth 345 kV Transmission Line Project
Minnesota Department of Natural Resources Project Review Meeting
September 14, 2017

Attendees

Cynthia Warzecha, MN DNR
Lisa Joyal, MN DNR
Kevin Mixon, MN DNR
Tom Hillstrom, Xcel Energy
Andrea Sampson, Merjent

Meeting Highlights

- Tom Hillstrom updated the group on the Project. The possible routes have been narrowed to a total of four; these, or a subset of these will be analyzed in the PUC Route Permit Application (RPA). This was achieved by conducting a constraints analysis based on a variety of data sources, including the MN DNR's Natural Heritage Information Systems (NHIS) dataset.
- Kevin Mixon requested that the group go through the routes and talk about the areas he had highlighted as MN DNR's major issues/concerns. They are as follows:
 - 1) Smith Wildlife Management Area (WMA) (MN DNR Meeting Notes #1 pin in kmz) – Red Route
 - Tom pointed out that this would be a double circuit, and that Xcel could improve the existing route by removing the pole north of the WMA and combining the existing route with the route option (Red) and routing it along the road (405th Ave)
 - Kevin stated that this approach was much more acceptable to the MN DNR; he had spoken to the area wildlife manager, and he was also in agreement with this approach
 - Kevin stated that the MN DNR would have recommendations for avian flight diverters in this area (and elsewhere). These could be identified for all four routes, or they could wait until later in the process and identify locations just for the approved route. Regardless, the RPA should include a general avian plan that would apply to whichever route is chosen. Tom stated that waiting until there is one approved route is fine.
 - **No action needed**
 - 2) Crossing at Minneopa State Park – (MN DNR Meeting Notes #2 pin in kmz) - Red and Green Routes, Minneopa crossing option
 - Kevin requested an artist's rendering of what the route might look like going through the park. Not a viewshed issue, per se, but more of a rendering of the design to help visualize the project generally and get a feel for the final position

and direct impacts. He thought the park manager/personnel and the Friends of Minneopa State Park might find this very useful.

- Tom brought up the City of North Mankato's objection to the routes, and Kevin said that they had been in touch with the MN DNR, asking them to join in a letter opposing the western routes. Kevin said that the MN DNR would not be a signatory on the letter, as the city's issues are not the MN DNR's issues.
- There was some discussion about what to call the different crossings of the Minnesota River; the MN DNR would like to avoid the term "alternative" due to the fact that there are four separate routes that will be referred to as alternatives.
- Kevin is also concerned about the impacts to the wooded slope associated with the river crossing just south of Minneopa (see MN DNR Meeting Notes #2a pin in kmz), as well as the wooded draw approximately 0.15-mile south of the river crossing.

- **Visual Impact Assessment underway**

3) Cottonwood Lake (MN DNR Meeting Notes #3 pin in kmz) – Blue Route

- Area manager states that this is a high use area for migratory birds; concern is that route option is right next to the lake. Is it possible to shift this route to the east?

- **New alignments studied but not implemented due to increase of farmland impacts and proximity to additional homes.**

4) Pick WMA (MN DNR Meeting Notes #4 pin in kmz) – Blue Route

- Would it be possible to move the route option to turn west at this point to a spot farther north (i.e., closer to/along 124th Street), so that it's not in immediate proximity to the WMA?

- **New alignment studied but not implemented due to proximity to homes, additional stream crossings or the need for two new corners.**

5) Crossing of Sites of Biodiversity Significance (SOBS) and Native Plant Communities (NPCs) (MN DNR Meeting Notes #5 pin in kmz) – Purple, Red, and Green Routes

- Kevin asked if there would be a way to use the existing ROW for this route, as opposed to going through the NPCs and a SOBS with a high designation.
- Tom noted that the route would be placed as close to the existing ROW as possible.

- **New alignment implemented, proposed alignment is snugged up against the existing lines.**

6) Kevin and Tom discussed the possibility of connector segments between the Red and Green routes to allow for the use of the northern half of one and the southern half of the other. See "MN DNR Meeting Notes #6 - connector segment?" pins in kmz.

- **Suggestion implemented, we will include connector segment.**

7) Rice Lake WMA (MN DNR Meeting Notes #7 pin in kmz) – Green Route

- Would it be possible to move the line to the western side of 375th Ave where there is an existing ROW?
 - Kevin mentioned that the area manager was primarily concerned about the amount of burning they do on that parcel, and whether that might constitute a safety hazard if the line is located immediately adjacent.
 - **Alignment west of 375th studied but not implemented because there is not adequate room. Existing house is only approximately 70 feet from Road ROW. Existing line is just a small distribution line.**
- 8) Crossing of Blue Earth River immediately east of Huntley substation (MN DNR Meeting Notes #8 pin in kmz) – Blue, Red, and Green Routes
- Would it be possible to move the crossing farther to the north to cross at a narrower point?
 - **Alignment of river crossing adjusted by engineer to shorten crossing.**
- 9) Crossing of Elm Creek north of the town of Huntley (MN DNR Meeting Notes #9 pin in kmz) – Purple Route
- Would it be possible to move the line west, along the tree line, and cross at a narrower point?
 - **Alignment of river crossing adjusted by engineer to jog to west around river segment and cross at a narrow point.**
- 10) Crossing of Willow Creek north of 121st Street (MN DNR Mtg Notes #10 pin in kmz) – Purple Route
- Similar to the issue at Elm Creek/pin #9 – would it be possible to reroute the crossings here to a) minimize number of crossings and b) impact less riparian habitat?
 - **Alignment of river crossing adjusted by engineer to jog to east around river segment and cross at a narrow point.**
- 11) Crossing of Watonwan River north of 157th Street/502nd Ave (MN DNR Mtg Notes #11 pin in kmz) – Purple Route
- Similar to the issue at Elm Creek/pin #9 and Willow Creek/pin #10 – would it be possible to reroute the crossing to minimize impacts to riparian habitat?
 - **Alignment adjusted, two new corners added to cross river in a non-forested area.**
- Kevin reiterated that the artistic rendering of the route option across Minneopa Park is important for the MN DNR to review. Tom mentioned he would like to also check the viewshed as well from certain parts of the Park; Kevin said he would facilitate any site visits to the Park as needed.
 - Lisa Joyal noted her concerns were primarily related to SOBS and NPCs; she usually recommends avoidance of these sites, especially for sites ranked High and Outstanding.
 - Lisa noted that there may be portions of areas designated as SOBS that may be degraded and no longer meet the criteria. If Xcel has any data or information regarding degraded

areas within SOBS, that should be passed on to the MN DNR (as they do not update their data on these areas).

- Lisa was particularly concerned about prairies, and noted that there may be intact prairie parcels along railroad rights-of-way. She noted that no impacts to prairie should occur, and that in areas that may support prairie habitat, surveys should be conducted for presence/absence and delineation if necessary.
 - The DNR maintains a list of qualified surveyors and guidance documents on how to rank prairie habitat.
 - Tom had a question about possible prairie restoration taking place on a parcel to the west of the intersection of Judson Fort Road E and 524th Ave along the Purple route. Lisa asked if it would be possible to span the entire parcel; Tom was not sure. If it can't be avoided, then surveys may be required in this area.
- Lisa requested avoidance of rare NPCs such as Basswood forests and floodplain/riparian areas.
- Protected species that may be impacted include Blanding's turtle and loggerhead shrike
 - Employing appropriate BMPs will help to avoid/minimize impacts to Blanding's turtles
 - To avoid impacts to loggerhead shrike, Xcel should not clear during the nesting season (i.e., end of April through mid-July).
 - If clearing during the nesting season in suitable loggerhead shrike habitat, then species-specific surveys should be conducted.

From: [Hillstrom, Thomas G](#)
To: [Naomi Christenson](#); [Kevin Mueller](#)
Subject: FW: 345 kV Huntley to Wilmarth Transmission Line Project
Date: Thursday, September 14, 2017 8:23:24 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image001.png](#)
[Grant Sites with Fed State Restrictions.pdf](#)
[Excel Study Area Site Map.pdf](#)
[lawcon_conversion.pdf](#)

FYI

From: Mularie, Audrey L (DNR) [<mailto:audrey.mularie@state.mn.us>]
Sent: Thursday, September 14, 2017 7:51 AM
To: Hillstrom, Thomas G
Subject: 345 kV Huntley to Wilmarth Transmission Line Project

XCEL ENERGY SECURITY NOTICE: This email originated from an external sender. Exercise caution before clicking on any links or attachments and consider whether you know the sender. For more information please visit the Phishing page on XpressNET.

Thomas,

In response to your letter, attached is a listing by county of the local and state park grants subject to federal and state grant restrictions and a map showing the approximate locations of projects with restrictions within your study area. We do not have shapefiles for these parks. If you believe that there is a potential to impact one or more of the projects sites, I can provide scanned copies of the project maps we have on file.

Any non-recreational use proposed within the boundaries of a grant assisted site requires prior approval by the Commissioner of Natural Resources and, if funded through the federal the Land and Water Conservation Fund (LAWCON), by the National Park Service. I have attached the guidelines for the conversion process required prior to approval of allowing non-recreational use within a grant assisted site.

If you have any questions, please feel free to contact me.

Audrey

Audrey Mularie

Park Grant Coordinator | Parks and Trails

Minnesota Department of Natural Resources

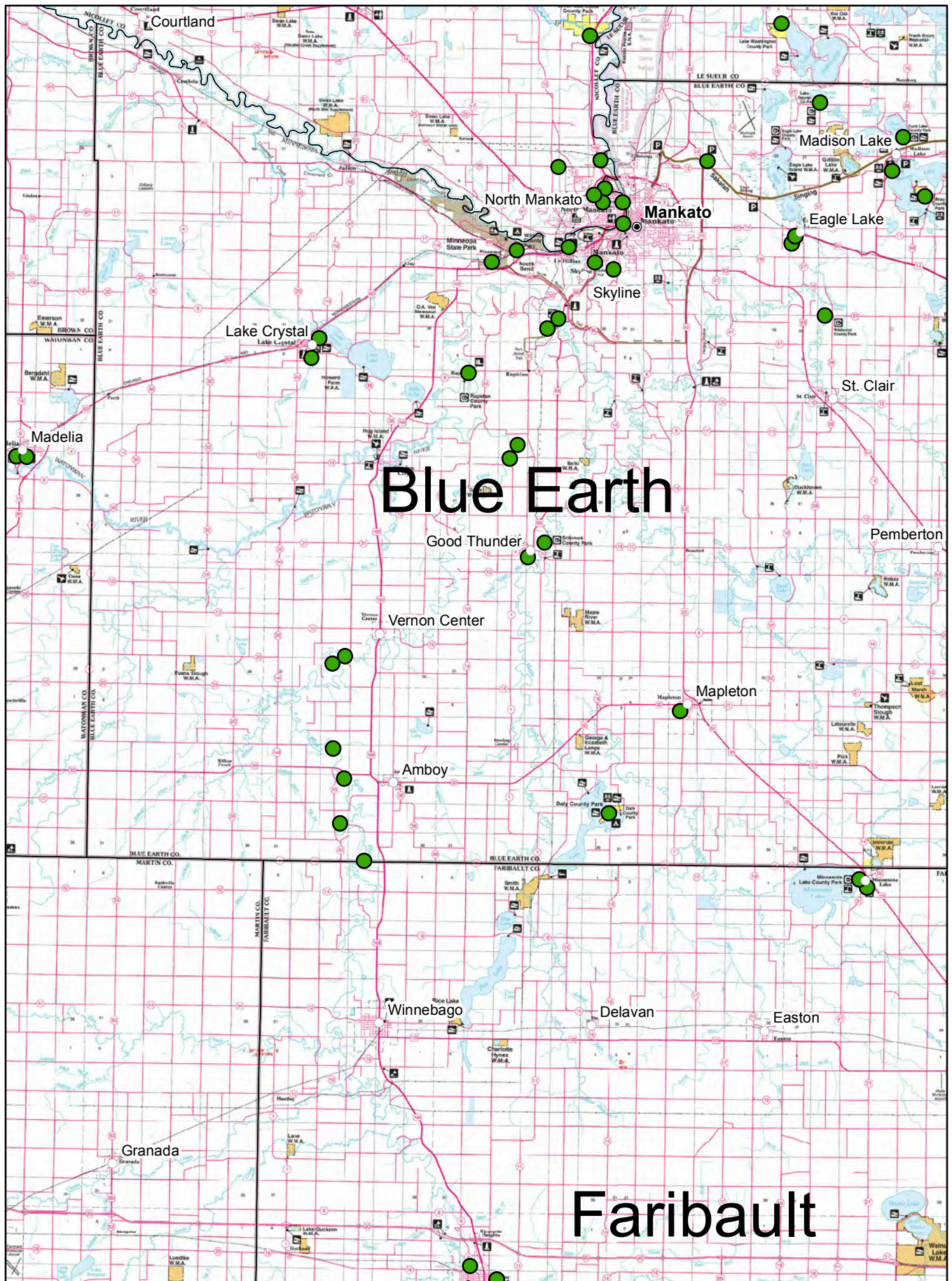
500 Lafayette Road

St. Paul, MN 55155-4039

Phone: 651-259-5549

Email: audrey.mularie@state.mn.us

mndnr.gov





Conversions of Use – Guidelines and Requirements

Grant agreements between the Local Sponsor and the State require land developed, improved, or acquired with Land and Water Conservation Fund (LWCF) and/or state assistance to be retained and used for public outdoor recreation. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of the State and/or National Park Service (NPS) pursuant to Section 6(f)(3) of the LWCF Act and these regulations. The conversion provisions of Section 6(f)(3), 36 CFR Part 59, and these guidelines apply to each area or facility for which LWCF assistance is obtained, regardless of the extent of participation of the program in the assisted area or facility and consistent with the grant agreement between NPS and the State.

This requirement applies to the area described in the project documentation approved by the State and/or the NPS. This area normally exceeds that actually receiving State and/or LWCF assistance so as to ensure the protection of a viable recreation entity.

Local sponsors must consult early with the State manager when a conversion is under consideration or has been discovered. Any previous project agreements and actions must be identified and understood to determine the actual boundary subject to the grant agreement. The State and/or the NPS Regional Director have the authority to disapprove conversion requests and/or to reject proposed property substitutions. This approval is a discretionary action and should not be considered a right of the project sponsor.

Situations that trigger a conversion include:

- a. Property interests are conveyed for private use or non-public outdoor recreation uses.
- b. Non-outdoor recreation uses (public or private) are made of the project area, or a portion thereof, including those occurring on pre-existing rights-of-way and easements, or by a lessor.
- c. Unallowable indoor facilities are developed within the project area without NPS approval, such as unauthorized public facilities and sheltering of an outdoor facility.
- d. Public outdoor recreation use of property acquired or developed with LWCF assistance is terminated.

To Request Approval for a Conversion: Formal requests from the project sponsor for permission to convert LWCF and/or state assisted properties in whole or in part to other than public outdoor recreation uses must be submitted in writing.

1. Submit a narrative description of the proposal that identifies all practical alternatives have been evaluated and rejected on a sound basis. The “do nothing” alternative must be considered. Minnesota typically processes only a couple of conversions each year, usually for road improvements undertaken to improve safety. Proposals to construct non-recreation facilities such as cell phone towers or to convey an interest in the property to a private party generally do not qualify, as there are usually practical alternatives available. Do not continue with the conversion process until this step has been approved by the State.

2. If approved to move forward with the conversion process, a critical first step is for the State and Local sponsor to agree on the size of the Section 6(f) park land impacted by any non-recreation, non-public use, especially prior to any appraisal activity. The area required for the conversion could include the entire park depending on the impact of the proposed facility and/or could include a minimum of all impacted land, buffer areas, any facility access, land cut off from the remaining park area and possible visual and/or noise impacts.
3. The next step is to identify the proposed replacement land to be acquired. The replacement land must be an addition to an existing facility or, if a new facility, constitute a viable, self-supporting unit of outdoor recreation. The grants manager must approve the extent of the conversion and the suitability of the replacement lands before continuing with the conversion process.
4. Information to be submitted with a conversion request:
 - a. Boundary maps of both the converted site and the proposed replacement land. These maps must include references to known landmarks, a north arrow, acreages, a graphic scale, the date of preparation, and the signature of the Local Sponsor. The map of the replacement land should also indicate planned recreation development and a proposed timeline for that development.
 - b. Appraisals and Appraisal Reviews - Fair market valuation of both the converted and replacement lands. Appraisals for a federal conversion request must be prepared in conformance with the Uniform Appraisal Standards for Federal Land Acquisitions and be reviewed by a qualified review appraiser. Appraisals for a state conversion request must be prepared in conformance with the Uniform Standards for Professional Appraisal Practice (USPAP). The grants manager will be able to give you guidance on making the appraisal assignments.
 - c. Environmental documentation - An environmental assessment must be prepared in accordance with the National Environmental Policy Act (NEPA) and/or state guidelines for both the property to be converted and the proposed replacement land. Additional information will be provided by the grants manager.
 - d. Historical / Archeological Review and Coordination - The [State Historic Preservation Office \(SHPO\)](#) must be afforded a chance to comment on the conversion proposal pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or Minnesota statutes. The SHPO must be contacted and provided information about the proposal. If the SHPO recommends a survey of the land be completed, the proposer must contract with a qualified firm to complete it and coordinate with the SHPO on any actions that must be taken to protect archeological / historical resources on the property.

If the conversion request is approved, the original grant agreement between the State and the Local Sponsor will be amended to delete the converted lands and add the replacement lands to the project boundary subject to the grant agreement.



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Benjamin J. Schaefer
Regional Operations Coordinator
MN DNR, Division of Land and Minerals
21371 State Hwy 15
New Ulm, MN 56073-5228

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Benjamin J. Schaefer:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

The project, referred to as the Huntley to Wilmarth 345 kV Project (Project), was identified by the Midcontinent Independent System Operator (MISO) as a market efficiency project to provide access to lower cost energy sources (e.g., wind energy) that currently cannot be fully utilized due to lack of adequate transmission. The Project is part of infrastructure improvements needed to allow advancement of renewable energy—particularly wind energy—in the state, throughout MISO, and nationally. Xcel Energy and ITC Midwest will co-own the new transmission line and Xcel Energy is acting as lead developer of the Project. The Project's endpoints were identified by MISO analysts specifically to allow the next increment of transmission capacity in the most efficient way.

Xcel Energy is in the process of evaluating route alternatives within the study area based on analysis of publicly available data that minimize socioeconomic and environmental impacts, maximize co-location with other infrastructure, and satisfy regulatory routing and facility siting requirements. Xcel Energy identified many potential route options within a large study area in order to obtain agency and public input to support the route selection process. Field review of final route alternatives are in the process of being conducted to clarify or confirm potential route issues or constraints. The attached map depicts the study area for the proposed Project and presents a selection of preliminary route options. If you prefer to review the data in a GIS shapefile format, please let us know and we will

Xcel Energy intends to file a Certificate of Need (CON) and Route Permit (RP) Application by the end of 2017, in accordance with Minnesota Rules (Minn. R.) 7849 and Minn. R. 7850 respectively, to the Minnesota Public Utilities Commission (PUC) for the Project. As part of this process, Xcel Energy is conducting public meetings and stakeholder outreach, as well as coordinate with applicable regulatory and government offices. We appreciate your assistance as we evaluate siting and routing information and work through the PUC's approval process. Please let us know if you have information we should consider in evaluating routes.

If you prefer to review the routes Xcel Energy is studying in a GIS shapefile format, or if you have questions and would like additional information about the proposed Project, please contact me at Thomas.Hillstrom@xcelenergy.com or (612) 330-5835.

Sincerely,

A handwritten signature in black ink, appearing to read "T Hillstrom". The signature is written in a cursive, flowing style.

Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Audrey Mularie
Grants Manager
MN DNR, Division of Parks and Trails/Local Grants Unit
520 Lafayette Road
Saint Paul, MN 55155

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Audrey Mularie:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map

Minnesota Pollution Control Agency



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Bill Sierks
Pollution Control Program Administrator
MPCA
520 Lafayette Road
Saint Paul, MN 55155

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Bill Sierks:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Emma Ziebarth
Environmental Specialist
MPCA
520 Lafayette Road
Saint Paul, MN 55155

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Emma Ziebarth:

Xcel Energy is proposing to construct a new 345 kilovolt (kV) high voltage transmission line (HVTL), extending from Xcel's Wilmarth Generating Station located in Mankato in Blue Earth County, to an ITC Midwest Huntley Substation south of Winnebago in Faribault County, just south of the intersection of U.S. Highway 169 and 345th Avenue.

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map

State Historic Preservation Office



Using the Power of History to Transform Lives
PRESERVING > SHARING > CONNECTING

STATE HISTORIC PRESERVATION OFFICE

October 3, 2017

Thomas Hillstrom
Excel Energy
414 Nicollet Mall
Minneapolis, MN 55401

RE: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet and Martin Counties
SHPO No. 2017-3011

Dear Mr. Hillstrom:

Thank you for the opportunity to comment on the above project. Information received in our office on 5 September 2017 has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Due to the nature and location of the above project, we recommend that a Phase IA literature review and archaeological assessment be completed for the various route alternatives to assess the potential for intact archaeological sites in the project areas. If, as a result of this assessment, a Phase I archaeological survey is recommended for the preferred route, this Phase I survey should be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking this type of research and archaeological surveys, please visit the website <http://www.mnhs.org/shpo/preservation-directory>, and select "Archaeologists, Contract" in the "Specialties" box.

We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact our Compliance Section at (651) 259-3455.

Sincerely,

A handwritten signature in cursive script that reads 'Sarah J. Beimers'.

Sarah J. Beimers, Manager
Government Programs and Compliance



414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
Xcelenergy.com

August 29, 2017

Sarah Beimers
Manager of Government Programs and Compliance
Minnesota Historical Society, State Historic Preservation Office
345 W. Kellogg Blvd.
St. Paul, MN 55102-1906

**Re: 345 kV Huntley to Wilmarth Transmission Line Project
Blue Earth, Faribault, Nicollet, and Martin County, Minnesota**

Dear Sarah Beimers:

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Thomas Hillstrom
Principal Permitting Agent

Enclosure: Project Location Map