

# **Exhibit D**

**American Tree Farm System**

**“About Us” and “Certification”**

**[www.treefarmssystem.org](http://www.treefarmssystem.org)**



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## About Us

### About Us

Our mission - *To promote the growing of renewable forest resources on private lands while protecting environmental benefits and increasing public understanding of all benefits of productive forestry.*

The American Tree Farm System® (ATFS), a program of the American Forest Foundation's Center for Family Forests, is committed to sustaining forests, watershed and healthy habitats through the power of private stewardship.

Since 1941, ATFS has educated and recognized the commitment of private family forest landowners in the United States. Currently, ATFS has certified 24 million acres of privately owned forestland and over 90,000 family forest owners who are committed to excellence in forest stewardship, in 46 states. Tree Farmers share a unique commitment to protect wildlife habitat and watersheds, to conserve soil and to provide recreation for their communities while producing wood for America. These individuals hold the key to the kinds of forests, forest activities and forest resources future generations of Americans will enjoy.

ATFS has established standards and guidelines for property owners to meet to become a Certified Tree Farm. Under these standards and guidelines, private forest owners must develop a management plan based on strict environmental standards and pass an inspection by an ATFS volunteer forester every five years.

Water. Wildlife. Recreation. Wood. The four sides of the Tree Farm sign tell the story of sustainable forestry ... a thriving forestland that has clean water, a healthy wildlife habitat and recreational opportunities. Our green and white diamond shaped Tree Farm signs are widely recognized across the country.

ATFS, dedicated to putting more good forestry on more acres.

The American Forest Foundation (AFF) is a nonprofit 501(C)(3) conservation and education organization that strives to ensure the sustainability of America's family forests for present and future generations. The organization's vision is to create a future where North American forests are sustained by the public which understands and values the social, economic, and environmental benefits they provide to our communities, our nation, and our world.

### [History](#)

### [Tree Farm Today](#)

### [Tree Farm in the 21st Century](#)



American Forest Foundation

### American Tree Farm System

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## Certification

The American Tree Farm System works to sustain forests, watershed and healthy wildlife habitats through the power of private stewardship by offering affordable forest certification for family forest landowners in the United States.

ATFS has undergone many changes since its beginnings in 1941 and is now recognized internationally as a credible forest certification system. ATFS certifies landowners to the American Forest Foundation's Standards of Sustainability for Forest Certification to ensure markets remain open to Tree Farmer's wood, by undergoing third-party certification audits by independent, ANSI-ASQ National Accreditation Board (ANAB) accredited certification bodies.

### American Tree Farm System Certification

ATFS offers third party certification to lands meeting the ATFS Eligibility Requirements. Landowners have three options to ATFS certification. Also see below for additional information on ATFS certification.

- [Group Certification through State Tree Farm Committee programs](#)
- [Group Certification through Independently Managed Group \(IMG\) Organizations](#)
- [Individual Third Party Certification](#)
- ATFS State Program Regional Certificates

[Northeastern Region](#)

[North Central Region](#)

[South Region](#)

[West Region](#)

- 2009 Regional Public Summaries

[Public Summary for the Northeastern Region \(2009\)](#)

[Public Summary for the North Central, South and West Region \(2009\)](#)

- 2010 Regional Public Summaries

[Public Summary for North Central, South and West Regions \(2010\)](#)

### AFF Standards of Sustainability and Guidelines

Certification in the American Tree Farm System is voluntary. The certification process incorporates established standards and guidelines. All properties certified under the three certification options must conform to the AFF Standards of Sustainability for Forest Certification (AFF Standards). The American Forest Foundation, a 501c.3, not-for-profit, organization located in Washington, D.C. has sole responsibility for setting the AFF Standards.

- [2008 Internal Monitoring Report](#)
- [2009 Internal Monitoring Report](#)
- [AFF 2010 - 2015 Standards of Sustainability for Forest Certification](#)
- [AFF 2004 - 2008 Standards of Sustainability and Glossary of Terms](#)
- [Standards Setting Procedures](#)
- [Disputes and Appeals Procedure](#)
- [Eligibility Requirements for ATFS Certification](#)
- [Eligibility Guidance](#)
- [Logo and Sign Use Rules](#)
- [American Tree Farm System Online Verification Database](#)
- [2010 Management Plan Addendum](#)

### Third Party Certification (PEFC)

[The American Tree Farm System is now endorsed by the Programme for the Endorsement of Forest Certification schemes \(PEFC\)](#). PEFC requires the American Tree Farm System follow internationally accepted third-party certification auditing procedures. Maintaining these procedures and our endorsement by PEFC, helps ensure that new and existing markets will be open to Tree Farmers.

- [What is third party certification?](#)
- [Programme for the Endorsement of Forest Certification schemes \(PEFC\) Certificate of Endorsement](#)
- [What is PEFC?](#)
- [American Tree Farm System Auditing Procedures](#)
- [Resources](#)

#### **American Tree Farm System and the Sustainable Forestry Initiative: Working Together**

The American Tree Farm System and the [Sustainable Forestry Initiative \(SFI, Inc.\)](#) partner to bring new sources of certified fiber to the paper and wood products marketplace.

Manufacturers holding SFI or PEFC chain of custody certificates are able to include wood harvested from American Tree Farm System certified lands in their certified wood basket. This adds over 24 million acres to the certified total in the U.S.

**What does this mean for Tree Farmers?** As everyday consumers and large corporations become more concerned with their environmental footprint, paper and wood products manufacturing companies are increasingly interested in selling certified products. As wood from American Tree Farm System certified lands can now be counted in SFI and PEFC chain-of-custody system, manufacturers are viewing Tree Farmers as a more attractive source of wood.



#### **Chain of Custody**

Chain of custody systems track certified wood fiber from the forest to the store shelf. Manufacturers, printers, distributors, and other entities may wish to obtain a chain-of-custody certificate from either SFI or PEFC (or both) to document the amount of certified fiber in their products. A chain of custody certificate is required to allow on-product labeling for certified content.

- [Chain of Custody Slide](#)
- [Chain of Custody Handout](#)

Please visit the [Sustainable Forestry Initiative's website](#), and [PEFC's website](#) to learn more about their chain of custody and fiber sourcing certificates.

#### **Carbon & Other Ecosystem Services**

Ecosystem service markets have become hot new topic and many landowners are excited to get involved with new markets, such as the Chicago Climate Exchange. Here you will find information on the different categories of ecosystem service market opportunities and links to educational resources on this important topic. The American Forest Foundation is working hard to increase the awareness of the benefits of active forest management and ensure that family forest landowners are able to participate in and benefit from these increasingly expanding markets. For more information, please visit the [American Forest Foundation's Website](#). Ecosystem markets are not a silver bullet for Tree Farmers, but they do represent a powerful tool that, if used appropriately with other available options, can go a long way toward ensuring that forests remain forests.

- [Carbon](#)
- [Water](#)
- [Biodiversity](#)
- [Resources](#)

#### **Landowner Tools**

#### **American Tree Farm System**

1111 19th St., N.W., Suite 780, Washington, D.C. 20036  
P: 202.463.2462 - E-mail: [info@treefarmssystem.org](mailto:info@treefarmssystem.org)

# **Exhibit E**

## **Wabasha County Ordinance Article 4**

### **Bluffland Area Protection**

## **ARTICLE 4**

### **BLUFFLAND AREA PROTECTION**

#### **SECTION 1. INTENT AND PURPOSE**

Wabasha County recognizes the historic, environmental and economic values of the bluffs that line the rivers, creeks, and valleys of the County. These standards set out to protect and preserve the sensitive physical features of the bluffland areas by regulating development, preventing erosion and maintaining vegetative cover on the slopes and tops of the bluffs.

#### **SECTION 2. SCOPE**

These standards shall regulate the setback of structures, sanitary waste treatment facilities and row crops from bluff impact zones to protect the existing and/or natural scenic values, significant historic sites, vegetation, soils, water and bedrock from disruption by man-made structures or facilities. These standards will also regulate alterations of the natural vegetation and topography.

#### **SECTION 3. GENERAL REGULATIONS**

- Subd. 1        New structures and accessory facilities (except stairways, lifts and landings) shall not be placed within bluff impact zones.
  
- Subd. 2        Notwithstanding subdivision one, a pre-existing structure located within a bluff impact zone may be reconstructed, if damaged by fire, weather or other force majeure or act of God, provided the damage is less than 50% of the fair market value of the damaged structure.
  
- Subd. 3        Setback from the top and toe of bluff to any structure in any district shall be no less than twenty (20) feet.
  
- Subd. 4        No person shall begin a new mining or quarrying activity within three hundred (300) feet of the toe or top of a bluff without a conditional use permit.
  
- Subd. 5        No towers, with the exception of emergency towers, shall be located within one-quarter (1/4) mile of the bluff impact zone.

Subd. 6 Stairways and lifts may be allowed to achieve access up and down bluffs and steep slopes to shore areas or plains. All stairways and lifts on bluffs and in shoreland areas shall be visually inconspicuous, and meet the following design requirements:

- A. Stairways and lifts shall not exceed four (4) feet in width on residential lots. Wider stairways may be used for commercial properties, public open space recreational properties, and planned unit developments.
- B. Landings for stairways and lifts on residential lots shall not exceed thirty-two (32) square feet in area. Landings larger than thirty-two (32) square feet may be used for commercial properties, public open space recreational properties, and planned unit developments.
- C. Canopies or roofs are not allowed on stairways, lifts, or landings.
- D. Stairways, lifts, and landings may be either constructed above the ground on posts or pilings, or placed into the ground, provided they are designed and built in a manner that ensures control of soil erosion.
- E. Stairways, lifts, and landings shall be located in the most visually inconspicuous portions of lots, as viewed from the surface of the public water and lower areas assuming Summer, leaf-on conditions, whenever practical.
- F. Facilities such as ramps, lifts, or mobility paths for physically handicapped persons are also allowed for achieving access to shore and lower areas, provided that the dimensional and performance standards of sub-items A-E are complied with in addition to the requirements of Minnesota Regulations, Chapter 1340.

Subd. 7 No grading, excavating or filling within the bluff impact zones, except for approved erosion control measures. Erosion control projects within the bluff impact zone shall comply with A. and B. below:

- A. Altered areas shall be stabilized to acceptable erosion control standards consistent with the field office technical guides of the Wabasha Soil and Water Conservation District and the USDA, Natural Resources Conservation Service.
- B. Plans to place fill or excavated materials in bluff impact zones shall be prepared by a qualified professional for

continued slope stability, and approved by the Department of Environmental Services. All costs to be born by the applicant.

Subd. 8 The top or toe of bluffs shall be certified by a registered land surveyor or Zoning Administrator.

Subd. 9 Vegetation Alterations. Vegetation alterations shall be subject to the standards found in Article 13 of the Wabasha County Zoning Ordinance.



# **Exhibit F**

**Comment of Minnesota Dept. of Transportation**

**April 29, 2011**



## Minnesota Department of Transportation

395 John Ireland Boulevard  
Mail Stop 130  
Saint Paul, MN 55155-1899

Phone: (651) 366-4791  
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[Dave.Sevkora@state.mn.us](mailto:Dave.Sevkora@state.mn.us)

April 29, 2011

Matthew Langan  
State Permit Manager  
Office of Energy Security  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198

Re: CapX 2020 Hampton – Rochester – La Crosse Transmission Line Project  
PUC Docket No. E002/TL-09-1448  
OAH Docket No. 7-2500-20283-2

Dear Mr. Langan:

The Minnesota Department of Transportation (Mn/DOT) has reviewed the Draft Environmental Impact Statement (DEIS) relating to the Application for a route permit filed by CapX2020 for its Hampton – La Crosse Transmission Line Project. Mn/DOT appreciates the opportunity to provide comments regarding the matters for which Mn/DOT has regulatory responsibility and other interests. Mn/DOT respectfully submits the following comments on some general matters that affect multiple portions of the DEIS as well as comments relating to some specific paragraphs of the DEIS.

### **General Comments**

On May 20, 2010, Mn/DOT submitted a comment letter on the scope of the EIS. That letter contains a detailed discussion of Mn/DOT's Utility Accommodation Policy and how that policy is applied to requests for permits along trunk highway rights-of-way. Mn/DOT intends to submit its letter on EIS scoping into the record in this matter and also to participate in the public hearings and evidentiary hearings. Therefore, the matters already discussed in the letter on scoping will not be repeated here. It is important to bear in mind, however, that the methodology for evaluating permit applications described in the scoping letter will be followed when CapX2020 submits permit applications for specific locations.

### **Aviation**

The DEIS notes in several sections where the proposed routes are close enough to airports to have a potential impact on aviation. The most significant impact to an airport open for public use is to the Stanton Airfield, which is discussed in sections 7.11.3 and 8.1.4.11. The Stanton Airfield is licensed by Mn/DOT's Office of Aeronautics, and its airspace must be protected to maintain its license. Mn/DOT's records reflect that the Stanton Airfield is not a commercial service airport.

The Stanton Airfield has two visual runways with required airspace protection for a 20:1 approach to maintain a license. The diagram enclosed as Attachment 1 depicts the airspace protection zones for the Stanton Airfield. The area inside the dashed line shows the FAA Part 77.25 horizontal surface, within which structures greater than 150 feet above the level of the runway are not permitted. The rings closer to the airfield depict locations along the 20:1 slope and representative heights of structures at those locations. For example, at the outermost of these rings, structures are limited to 100 feet in height. As the DEIS notes, proposed route alternatives 1B-005 and 1P-009 pass close enough to the east end of one of the Stanton Airfield runways as to present problems for safe operation of the airfield and continued licensing of that facility.

A filing with the Federal Aviation Administration (FAA) on FAA Form 7460-1 will be required. The DEIS should also indicate the Applicant's obligation to obtain all the required approvals from an aviation safety perspective. In addition to obtaining from the FAA a "Determination of Hazard" or "No Hazard", permits from either Mn/DOT or the local airport zoning authority are required. We are unable to determine from the DEIS whether all public airports within five miles of the project have been notified and given an opportunity to comment on compatibility of transmission lines with airport operations and land use compatibility.

#### Highway Impacts Associated with Construction of Transmission Lines

The DEIS discusses in section 7.11.1 the temporary impacts on the highway system caused by the construction of the transmission line. Based on recent discussions with CapX2020 about construction plans for the Hampton to La Crosse route, Mn/DOT believes that the description in the DEIS should be expanded to include additional information about the impact of transmission line construction on traffic flow along the Applicant Preferred Route.

In each location where a transmission line will cross a freeway or expressway, temporary traffic barriers will need to be installed to protect the area in the median where transmission line work will take place. This will likely require temporary lane closures in both directions on the highway. We understand that CapX2020 is considering the use of helicopters to facilitate stringing the wires on the transmission towers, and that the process would involve multiple pulling operations for each wire. Traffic on the highway will need to be slowed in both directions while these operations are taking place. It is anticipated that the work on each crossing will last for about a week.

In addition to such work at expressway crossing locations, we understand that the Applicant is considering the use of helicopters to facilitate stringing the wires for the entire project. The Applicant has also provided information about one of the methods for splicing wires together involves use of implosive charges. If the route and alignment ultimately selected runs parallel to a highway (and in particular US 52), these activities will take place over a substantial length of time in the immediate vicinity of a busy highway. Clearly, there is a substantial risk that drivers may be distracted by these activities, and therefore traffic flow would need to be carefully managed and monitored throughout the construction process.

Managing the traffic impacts of constructing a 345kV transmission line along an Interregional Corridor will require a significant amount of planning and coordination among many groups, including the Applicant, Mn/DOT, the State Highway Patrol, and local highway and law enforcement authorities. Activities to be addressed include determining a work schedule based on anticipated traffic loads, developing and implementing media alerts and

other communications plans, developing and implementing appropriate traffic control including barrier locations, fixed signs and variable message boards, implementing temporary rolling roadblocks for lane closures, and ensuring that contingency plans are in place.

With regard to the Monticello to St. Cloud route, the Applicant and Mn/DOT have initiated a cooperative planning process to manage the safe flow of traffic during the construction activities associated with that process. We anticipate that a similar traffic management plan would be required if the US 52 corridor is used in this route application.

The text of the DEIS should also be expanded to explain that amount and severity of the impact on traffic operations associated with construction of a high voltage transmission line will vary among the route options under consideration. In addition, the statements in the DEIS that the transportation related impacts of other routes will be similar to those of the Applicant Preferred Route should be corrected. Due to the greater complexities of high volume divided highways and the far greater traffic loads carried by Interregional Corridors such as US 52, the Applicant Preferred Route which runs generally along US 52 will have significantly greater impacts on highway traffic than Applicant's Alternative Route or other route options that run across or along lower volume roads.

In addition, the DEIS could be supplemented to include discussion of mitigation of the impacts on traffic associated with construction activities. The DEIS should include a paragraph indicating that the construction operations will have a significant impact on traffic operations and recommending that the Applicant be required to coordinate with Mn/DOT, local highway authorities, the State Patrol and other appropriate agencies and organizations regarding managing the safe flow of traffic throughout the construction process. It should also be clear that the Applicant should bear ultimate responsibility for the activities necessary to accommodate the construction of their project, including financial responsibility for costs that may be incurred such as rental of equipment or fees for temporary work (e.g., off-duty Highway Patrol officers supervising traffic control procedures) that the project may require.

### Highway Crossings

The maps in Appendix A depict the boundaries of the proposed routes and a possible alignment within those proposed routes. In many locations where the proposed routes run parallel to a trunk highway, the alignment illustrated in the maps crosses over the highway and back again a significant number of times. This phenomenon can be seen on the Applicant Preferred Route as it follows along US 52. While individual highway crossings generally do not present insurmountable problems, a large number of crossings of the same highway can be problematic. This is especially true of high volume Interregional Corridors and freeways. First, the construction of a transmission line of this size is quite disruptive to traffic on such highways, and repeated crossings increases the difficulty of maintaining the safe flow of traffic while the transmission line is being built. Second, the presence of transmission lines on both sides of the highway acts as a significant constraint on the management and operation of the highway in the future. For example, at the point in the future when additional overpasses, interchanges or lanes need to be added, the options available would be constrained by the transmission line, and the cost incurred by the public to operate and maintain the highway will be increased. The DEIS should indicate that repeated highway crossings are very likely to cause the Trunk Highway Fund to incur significant additional costs in the future. Accordingly, when a route for the transmission line is selected, the applicant will need to work with Mn/DOT to minimize the number of times the alignment of the transmission line crosses the trunk highway(s).

## Comments on Specific Paragraphs

Section 5.3.1. This section states that while structures are generally constructed at grade, for areas with more than 10 percent slope a working areas would have to be graded level or fill would be brought in to create working pads. This could affect Mn/DOT right-of-way in some areas, and each location where working pads may be necessary would need to be further evaluated through Mn/DOT's permitting process when specific pole locations are known.

Section 7.11.1. This section contains the statement: "Visual simulations of the proposed transmission line structures as they would be seen from the perspective of a traveler along the Great River Road are being prepared and will be submitted for the record." It is important that any simulations of the impact of the transmission line include a realistic depiction of the vegetation that the applicant will remove around its power line. Merely superimposing the transmission line structures on a single photo from a single vantage point provides an incomplete representation of the impact the transmission line will have on a scenic byway such as the Great River Road. To have probative value, the visual simulation should be sufficiently comprehensive to provide a full representation of what the full impact of the transmission line will be. In addition, the Applicant should be required to take steps to mitigate the impact of the removal of vegetation along the Great River Road.

Section 8.1.4.3 – This section of the DEIS reviews pinch points along the proposed routes. Some of the pinch points have the potential to affect Mn/DOT right-of-way. An additional pinch point that should be included is along US 52 south of MN 57 and north of CR 50. A house is located near the highway right-of-way on the west side of US 52 where the transmission line is proposed to be located.

Section 8.1.4.11 and Map 8.1-26 – Map 8.1-26 shows areas where the right-of-way for the proposed route alternatives would "share" right-of-way with existing transportation, transmission line, or pipeline infrastructure. With respect to trunk highways, the word "share" in this context should be understood to mean that the transmission line would occupy a portion of the trunk highway right-of-way. Route 1P follows US 52 for about 27 miles and thus presents a right-of-way impact and requires coordination with future Mn/DOT projects. Map 8.1-26 identifies locations along US 52 where future projects such as interchanges or grade separations have been identified and are under consideration. The DEIS discusses that the applicants are requesting a wider route to accommodate future right-of-way options to avoid conflicts with Mn/DOT plans for the following projects:

- interchange at CR 47 near Hampton;
- potential railroad overpass 0.3 miles north of intersection of 295<sup>th</sup> Street and US 52;
- interchange at CR 24 south of Cannon Falls;
- interchange at CR 1 and / or CR 9; and
- interchange at CR 86 north of Cannon Falls.

Additional locations listed on Map 8.1-26 but not discussed in the text include potential interchanges or overpasses at MN 57, CR 50, and CR 7. The width of the Applicant's proposed route should also be wide enough in these locations to accommodate future highway projects in these locations.

In addition to the future projects such as interchanges, the future work to US 52 is likely to involve adjustments to local roads associated with those projects as well as addition of features

such as frontage roads. These would also require consideration when evaluating placement of transmission lines along US 52. Thus, additional coordination between the Applicant and Mn/DOT will be needed to fully accommodate these future road improvements if the Applicant's preferred route is selected.

Section 8.1.4.11 states that most portions of rural US 52 are constructed on approximately 280 feet of right-of-way, and also that the Applicant has proposed that 70 feet of the transmission line right-of-way overlap the highway right-of-way. It is important to note that the width of the highway right-of-way is not uniform and may vary in width along any highway. Also, 70 feet of occupation of the highway right-of-way implies a pole placement approximately 5 feet outside the right-of-way boundary line. As Mn/DOT noted in its letter on the scoping of the DEIS, US 52 is a four-lane divided highway that carries a high volume of vehicle traffic daily. US 52 has been designated as a high priority Interregional Corridor and the vision for US 52 is to develop it as a fully access controlled freeway facility. Therefore, Mn/DOT's intent is to apply freeway standards to any permit applications by the Applicant, including the restriction on static occupation of the highway right of way. This would imply a pole position approximately 25 feet outside the right-of-way boundary line.

Section 8.2.4.11. Mn/DOT has a design build project on US 52 south of Pine Island for a new interchange, realignment of existing county roads, and addition of frontage roads. Known as the Elk Run project, construction on this interchange is currently underway. Although an information box for the Elk Run interchange is indicated on Map 8.2-22, the location is incorrectly identified, and this project is not mentioned in the text of the DEIS. In addition, this project is not reflected in the maps in Appendix A. The extent and impact of the Elk Run interchange project on possible transmission line routes cannot be fully addressed unless the full footprint of the Elk Run project is shown on all relevant maps. It appears that number of the alignments (e.g., 2P, 2B-001, 2C3-001-2, 2C3-005-2, 2C3-006-2, 2C3-007-2, and 2C3-008-2) would be within or near the Elk Run interchange project. The affected alignments should be reviewed for impact associated with the Elk Run interchange project. The alternatives for Segment 3 (2C3) should also be reviewed for potential impact in this area.

On page 133, the DEIS states, "Based on consultation with DOT, the 2P and 2A route alternatives are not expected to impact roadway expansion plans on US Hwy 52." The lack of discussion of the Elk Run project leads us to believe that the DEIS has not fully assessed the impacts of highway changes with respect to proposed routes 2P, 2B-001, 2C3-001-2, 2C3-005-2, 2C3-006-2, 2C3-007-2, and 2C3-008-2. This should be addressed in the EIS.

Map 8.2-22 and Map 2.6-02. Both of these maps appear to have incorrect labels for route alternative 2B-001. This segment is identified as 2A-002 and should be corrected.

Map 8.2-22. Map 8.2-22 shows highway right-of-way sharing along US 52 through the Elk Run interchange project and continuing south and east through Oronoco to the north side of Rochester. However, none of the route alternatives in the DEIS appear to include this portion of US 52. The indication of a route along US 52 in this area appears to be an oversight that should be revised.

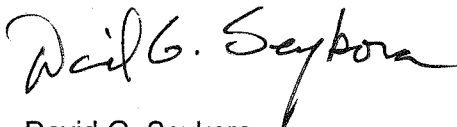
Section 8.3.4.11. The discussion in this section should be supplemented to include additional information of the impact of the transmission line on highways such as route option 3B-003, which would run parallel to MN 42. In particular, for a couple miles immediately west of US 61, MN 42 follows a winding route through steep, heavily wooded terrain. There are steep banks on both sides of the highway, and it appears likely that working pads of the type

described in Section 5.3.1 would be required. The construction activity and the removal of vegetation alongside the highway would require careful evaluation of the potential for erosion of the highway right-of-way, slope failures, proper water drainage, and the potential for rockfall onto the highway. Experience has shown that the steep bluff areas above US 61 are prone to mud slides after heavy rains, especially in locations where significant amounts of vegetation have been removed.

Section 8.3.4.12. The discussion of mitigation in this section states "Because all route alternatives in this segment would cross the Great River Road National Scenic Byway, visual impacts to this recreation area would be similar across route alternatives." It then points out that the visual impacts are not similar across route alternatives because routes 3P-Kellogg and 3A-Kellogg would also run parallel to the scenic byway for approximately 1.3 to 1.5 miles. The DEIS should state that routes 3P and 3A, which follow the existing transmission line crossing the scenic byway, have the least impact, while routes 3B-003, 3P-Kellogg and 3A-Kellogg would have greater adverse impact on the Great River Road National Scenic Byway. This section of the DEIS does not indicate how much vegetation removal would be required by the various route options along US 61, and it fails to discuss mitigation for tree clearing.

Mn/DOT has a continuing interest in working with the OES to ensure that possible impacts to highways, airports, waterways, rail lines and the environmentally significant areas of highway right of way are adequately addressed. We appreciate the opportunity to provide these comments. Please feel free to contact me if you have any questions regarding the information provided.

Sincerely,



David G. Seykora  
Office of the Chief Counsel

Enclosure

cc: Deborah R. Pile, OES  
Karen Hammel, OAG  
Lisa Agrimonti, CapX2020  
Carol Overland, NoCapX2020/U-CAN  
Jon Chiglo, Mn/DOT  
Val Svensson, Mn/DOT  
Greg Paulson– Mn/DOT District 6  
Thomas O'Keefe – Mn/DOT Metro District

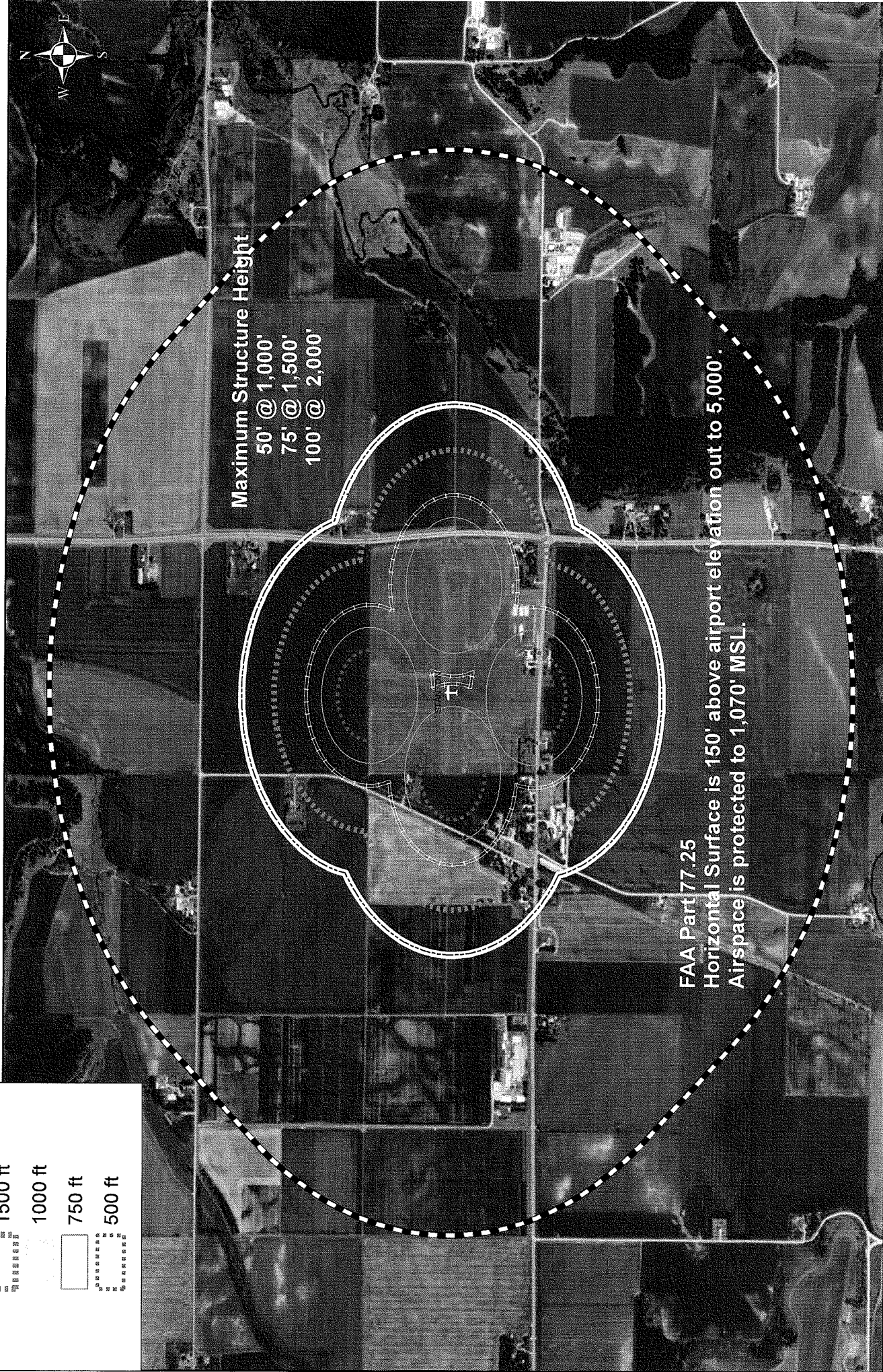
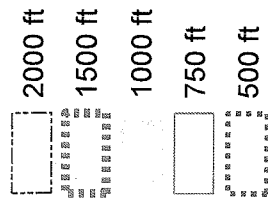
# Stanton Airfield

Field Elevation: 920'

Federal Airspace Protection

20:1 Slope

## Horizontal Distance From Runway End



### Maximum Structure Height

- 50' @ 1,000'
- 75' @ 1,500'
- 100' @ 2,000'

FAA Part 77.25  
Horizontal Surface is 150' above airport elevation out to 5,000'.  
Airspace is protected to 1,070' MSL.



# **Exhibit G**

**Applicant response to NoCapX & U-CAN IR No. 7**

**Slope Table and Slope Map**

NOCAPX 2020 & U-CAN INFORMATION REQUEST

- Non Public Document – Contains Trade Secret Data  
 Public Document – Trade Secret Data Excised  
 Public Document

To: Xcel Energy  
Docket No.: OAH Docket No.: 3-2500-21181-2  
MPUC Docket No.: E002/TL-09-1448  
Response To: NoCapX 2020 & U-CAN Information Request No. 7  
Date Received: April 26, 2011

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Request No. 7: Hillstrom Direct Testimony

Direct, p. 10, l. 8, regarding “Segment 3” and the “rugged, wooded terrain of blufflands west of the Mississippi River” in the North Rochester to Mississippi River 345kV section:

- a. Identify on map those sections of the Modified Preferred route and Alternate routes are in bluffland with a 12% slope or greater.
- b. What percentages of the Modified Preferred route and Alternate routes are in bluffland with a 12% slope or greater?

Response:

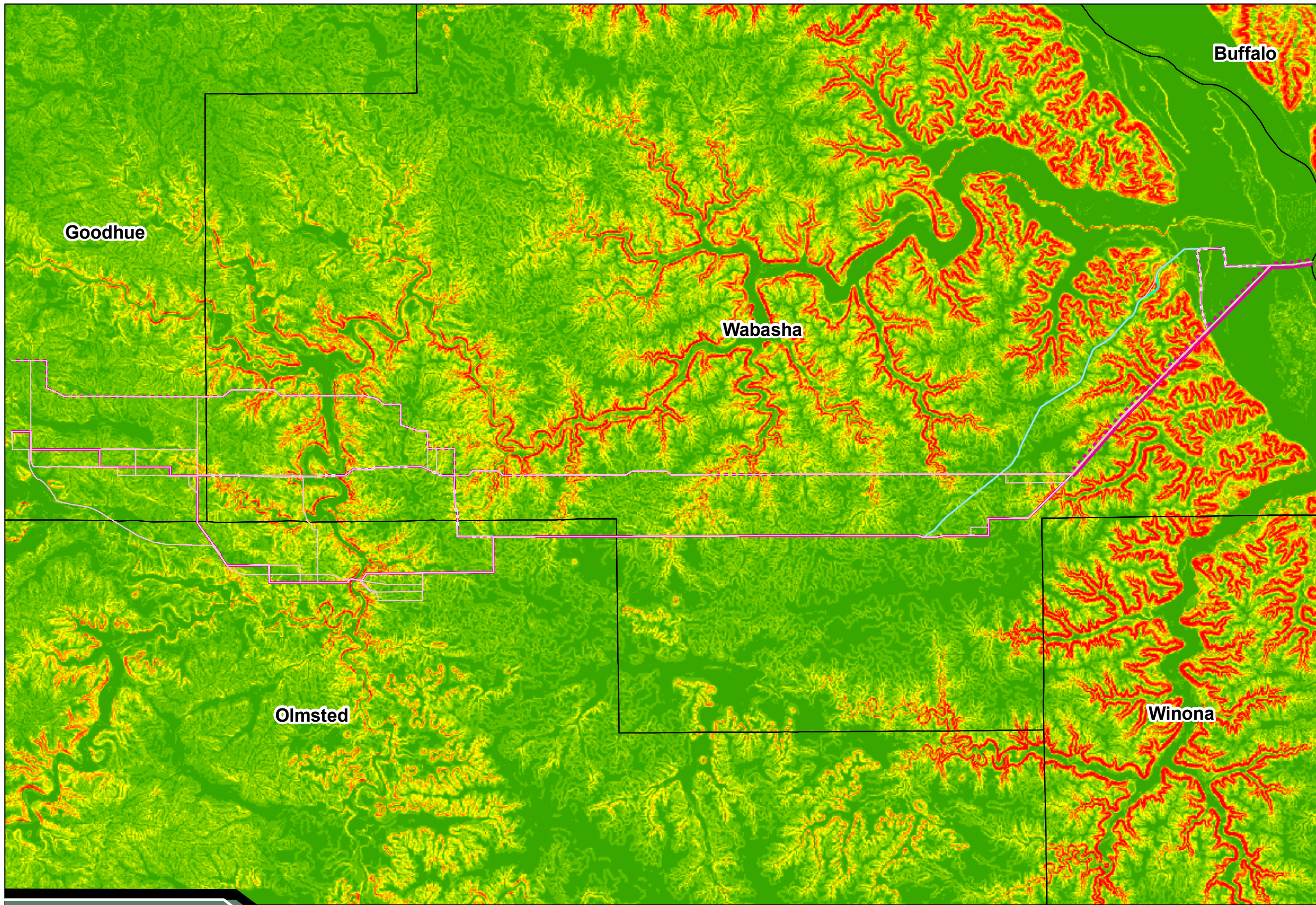
- a. A map showing route alternatives overlain with various slope ranges is enclosed.
  - b. A table showing percentages of routes in lands steeper than 12% slopes is shown on the attached table. The table was produced using data shown on the slope map and is indicative of a high level characterization of land forms and should not be used to characterize any specific pole location.
- 

Response by: Tom Hillstrom  
Title: Supervisor  
Department: Siting and Land Rights  
Date: May 10, 2011

**Table: Slope<sup>1</sup> Comparison for Modified Preferred 345 kV Route and Alternative 345 kV Route from North Rochester to the Mississippi River**

Resource Category	Modified Preferred 345 kV Route	Modified Preferred 345 kV Route with Highway 42 Segment	Alternative 345 kV Route	Alternative 345 kV Route with Highway 42 Segment
Length of route (miles) crossing areas with >12% slope	28.3	24.7	30.0	27.2
Percent of route crossing areas with >12% slope	63.1%	53.9%	71.5%	62.7%
<b>Total length of route (miles)</b>	<b>44.8</b>	<b>45.8</b>	<b>41.9</b>	<b>43.4</b>

<sup>1</sup>Slope data was provided by the Driftless Area Initiative.



**Legend**

**Scoping Alternative <sup>(Barr)</sup>**

- Segment 3 Alternative
- 3B-003 (HWY 42)

**MN RPA 345 kV Routes**

- Modified Preferred
- Alternative
- Both
- Option

County

**Percent Slope <sup>(Driftless Area Initiative)</sup>**

- 0% - 8.22%
- 8.23% - 18.7%
- 18.71% - 30.2%
- 30.21% - 43.3%
- 43.31% - 58.2%
- 58.21% - 76.5%
- 76.51% - 99.6%
- 99.61% - 134.2%
- >134.2%

0 2 Miles

Data Sources: BTS, Barr, Driftless Area Initiative  
 North Rochester to Mississippi River Slope Map  
 P:\2007\071800\_25\_CAPX\GISData\EDAW\MN\_App\MN\_RPA\_Shapefiles\_Modified\_Testimony  
 P:\2007\071800\_25\_CAPX\GISData\EDAW\MN\_App\MN\_RPA\_Shapefiles\_Modified\_Testimony

Exhibit H

Minnesota Geological Survey

Bedrock Map S-21