ROCHESTER-OLMSTED PLANNING DEPARTMENT

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April 13, 2016

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

RE: PUC Docket Number G-011/GP-15-858, MERC Route Permit for the Rochester Natural Gas Pipeline Project

Dear Mr. Hartman,

Staff at the Rochester-Olmsted Planning Department have reviewed the above-referenced route permit application and compiled the following comments/questions:

- "Olmsted" is misspelled "Olmstead" in quite a few locations.
- The preferred alignment between CSAH 8 (MP 9.6) and 11th Ave SW (MP 11.6) crosses through a developed, residentially planned land within the present Rochester urban growth area. This alignment will affect the development potential of these properties. The alternative alignment to the south which follows the 48th Street SW ROW would not have the negative effects on the development of the area. Our staff did provide the applicant with both the Olmsted County and City of Rochester land use plan maps for them to consider in their route planning.
- The proposed pipeline cuts through the Decorah Edge in several locations, mostly on the southerly and easterly portion of the construction zone. To minimize impact on this sensitive feature, we request that the applicant
 - Minimize grading
 - Install seep collars or other mitigation strategies to control groundwater movement along the pipe
 - Vegetate and control erosion to mitigate potential changes to groundwater flows
- What construction mitigation strategies will be employed if subsurface excavation uncovers or exacerbates karst features? The project document says the line will be rerouted within the ROW if a sinkhole is encountered, but what will be done if any damage is caused to the underlying geology and groundwater features?
- Is it possible to replace tree cover within the pipeline ROW to minimize impact on wildlife habitat and visual appeal while ensuring tree roots do not interfere with the pipeline?
- Olmsted County has an adopted All Hazard Mitigation Plan and Rochester will soon have one of their own. MERC should share their Spill Prevention, Containment, and Countermeasures Plan and other similar hazard mitigation documents with the Olmsted County Sheriff's Department, the City of Rochester Emergency Management Department, and the Rochester-Olmsted Planning Department to ensure inclusion of these hazards/mitigation strategies into these public emergency management plans.

 Submission of a GIS dataset of the final pipeline location and right-of-way should be included with this to assist local staff with development review and hazard management.

Thank you for the opportunity to comment on this permit.

Sincerely,
Sandra Goslee
Principal Planner
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