Appendix I

Draft Vegetation Management Plan

DRAFT

VEGETATION MANAGEMENT PLAN

Gopher to Badger Link Project

MPUC Docket No. ET3, E002/TL-26-156

Submitted by:

Northern States Power Company d/b/a Xcel Energy

Dairyland Power Cooperative

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TABLE OF CONTENTS

1 Introduction 1
1.1 Overview 1
1.2 Goals 1

2 Project Description 2
2.1 Environmental Setting and Existing Conditions 2
2.2 Sensitive Ecological Areas 2
2.2.1 Federal and State Conservation Lands 2
2.2.2 Native Plant Communities and Native Prairie 3
2.2.3 Minnesota Biological Survey Sites of Biodiversity Significance 3
2.2.4 Calcareous Fens and Other Sensitive Wetland Systems 4

3 Project Components 5
3.1 Transmission Line 5
3.1.1 Temporary Workspaces 5
3.2 Associated Facilities 5

4 General Rights-of-Way Vegetation Management 6
4.1 Vegetation Removal 7
4.1.1 Upland Vegetation Removal 7
4.1.2 Wetland Vegetation Removal 7

5 Erosion and Sediment Control 8

6 Noxious Weeds and Invasive Species 8
6.1 Standard Best Management Practices 9
6.2 Invasive and Noxious Species-Specific Best Management Practices 10
6.3 Invasive Tree Pests 10
6.4 Oak Wilt 11

7 Herbicide Application 11
7.1 Organic Farms 11

8 Seeding and Revegetation 12
8.1 Seeding Methods 12
8.2 Temporary Revegetation 12
8.3 Permanent Revegetation 13
8.3.1 Permanent Seeding of Upland Areas 15
8.3.2 Permanent Seeding of Wetland Areas 16
8.3.3 Ecologically Significant Areas 16

9 Monitoring 17

10 Operation And Maintenance 17
10.1 Routine Inspections and Maintenance 18
10.2 Fall Line Trees 18
10.3 Emergencies 18

LIST OF TABLES

Table 2.2-1 MDNR Native Plant Communities and Native Prairie Crossed by the Project 3
Table 2.2-2 Minnesota Biological Survey Sites of Biodiversity Significance Crossed by the Project....4
Table 6-1 Minnesota Department of Agriculture Prohibited Noxious Weeds 9
Table 8.2-1 Temporary Cover Crops....13
Table 8.3-1 Permanent Seed Mixes....14

LIST OF ABBREVIATIONS AND ACRONYMS

Applicants	Northern States Power Company, d/b/a Xcel Energy and Dairyland Power Cooperative
BMPs	Best Management Practices
BWSR	Minnesota Board of Soil and Water Resources
Commission	Minnesota Public Utilities Commission
Dairyland	Dairyland Power Cooperative
d/b/a	doing business as
ECD	erosion control device
EI	Environmental Inspector
ERO	Electric Reliability Organization
FERC	Federal Energy Regulatory Commission
INS	Invasive and noxious species
kV	Kilovolt
MBS	MDNR Minnesota Biological Survey
MDA	Minnesota Department of Agriculture
MDNR	Minnesota Department of Natural Resources
MPCA	Minnesota Pollution Control Agency
NERC	North American Electric Reliability Corporation
NPC	MDNR Native Plant Communities
NWFR	Upper Mississippi River National Wildlife Refuge
Project	Gopher to Badger Link Project
SBS	Sites of Biodiversity Significance
SWPPP	Stormwater Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service
Xcel Energy	Northern States Power Company, d/b/a Xcel Energy

1 INTRODUCTION

Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (Xcel Energy) and Dairyland Power Cooperative (Dairyland) (together, Applicants[1]) developed this Vegetation Management Plan (VMP) for the Gopher to Badger Link Project (Project).

The Project is part of a planned 765 kilovolt (kV) path connecting Minnesota, South Dakota, Iowa, and Wisconsin, and consists of the following:

- **Segment 1**: Approximately 39 miles of single-circuit 765 kV high voltage transmission line between the existing North Rochester Substation[2] and a point near Marion, Minnesota;

- **Segment 2**: Approximately 105 miles of 765 kV/161 kV double-circuit high voltage transmission line from near Marion, Minnesota, to the eastern border of Minnesota. Segment 2 also includes a new three-circuit breaker 161 kV switching station in Houston County, Minnesota, as well as minor upgrades at existing 161 kV Adams and Harmony substations to support operation of the new Project facilities; and

- **Q-9**: Rerouting of approximately 1.2 miles of Dairyland's existing Q-9 161 kV line to connect to the proposed switching station.

The Applicants acknowledge that a Route Permit issued by the Minnesota Public Utilities Commission (Commission) for the Project may include a route and alignment that is different than the Proposed Routes and Rights-of-Way discussed in this Draft VMP. The final VMP will be updated as needed to reflect the issued Route Permit.

1.1 OVERVIEW

The Applicants have developed this VMP for the Project to comply with an anticipated condition in the future Route Permit. As of the date of the development of this Draft VMP, the Commission's sample route permit requires: "The Permittees shall develop a vegetation management plan (VMP), in coordination with the Vegetation Management Plan Working Group (VMPWG), using best management practices [BMPs] established by the [Minnesota Department of Natural Resources] MDNR and Minnesota Board of Soil and Water Resources [BWSR]. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the MDNR with the Commission as part of the plan and profile required in Section 9.2 of the Permit."

1.2 GOALS

The primary goals of this Plan are to describe the procedures that will be implemented:

- During construction of the transmission line to revegetate and restore the Rights-of-Way in accordance with landowner preferences and in compliance with federal, state, and local permits and authorizations, and Minnesota water quality standards; and

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1 As it relates to the implementation of this VMP, Xcel Energy will implement the VMP on Segment 1, and Dairyland will implement the Agricultural Impact Mitigation Plan on Segment 2 and the Q-9 reroute, including the Jefferson Ridge Switching Station.

2 The North Rochester Substation will be expanded to accommodate 765 kV facilities and is being reviewed as part of PowerOn Midwest in Minnesota Public Utilities Commission Docket No. E002, ET2, ET6675/CN-25-117 and a forthcoming related route permit proceeding.

- To maintain the Rights-of-Way during operations in a manner that ensures a safe and reliable transmission line.

This Plan was developed based on the Applicants' experience implementing BMPs during construction, as well as applicable North American Electric Reliability Corporation (NERC) requirements and requirements set by the Commission.

2 PROJECT DESCRIPTION

2.1 ENVIRONMENTAL SETTING AND EXISTING CONDITIONS

The Project is located in Goodhue, Olmsted, Wabasha, Mower, Fillmore, and Houston counties in southeastern Minnesota. The Proposed Rights-of-Way are located within the Eastern Broadleaf Forest Province and cross portions of the Rochester Plateau, Oak Savanna, and Blufflands ecological subsections. These ecological settings represent a transition from predominantly agricultural landscapes characterized by cultivated cropland and gently rolling terrain in the western portion of the Project area to the more rugged topography, forested bluffs, and deeply incised stream valleys of the Driftless Area in the east.

Agriculture is the dominant land use throughout much of the Project area, with extensive cultivated cropland, hayland, pasture, and scattered rural residential development. The Project also crosses areas of forest, woodland, shrubland, grassland, wetlands, riparian corridors, and developed lands. Existing vegetation conditions range from actively managed agricultural fields and maintained utility rights-of-way to native and semi-natural plant communities associated with wetlands, floodplains, forested slopes, and stream corridors.

Existing transportation, utility, and energy infrastructure is common throughout the Project area and will influence construction access, restoration activities, and long-term vegetation management. These existing rights-of-way contain vegetation that has been subject to ongoing maintenance and management activities.

2.2 SENSITIVE ECOLOGICAL AREAS

The Project crosses ecologically significant habitats and conservation lands in southeastern Minnesota that support Native Plant Communities (NPCs), wildlife habitat, and other important ecological functions. These resources include federal and state conservation lands, native prairie, forested habitats, wetlands, floodplain communities, and areas identified by the MDNR as having elevated biodiversity value. These habitats will be considered during vegetation clearing, restoration, invasive species management, and long-term vegetation maintenance activities.

2.2.1 Federal and State Conservation Lands

Based on the current Project design, Segment 2 crosses portions of the following federal and state-managed conservation lands:

- Upper Mississippi River National Wildlife and Fish Refuge (NWFR)
- Richard J. Dorer Memorial Hardwood State Forest
- Shooting Star Prairie Scientific and Natural Area

- Winnebago Creek Aquatic Management Area
- BWSR conservation easements

The Applicants have initiated coordination with the U.S. Fish and Wildlife Service (USFWS), MDNR, and BWSR regarding these resources and will incorporate applicable vegetation management measures and agency recommendations into this VMP, as appropriate, when available.

2.2.2 Native Plant Communities and Native Prairie

The Applicants reviewed available MDNR resource data, including Minnesota Conservation Explorer, NPC mapping, and other publicly available habitat datasets to identify native vegetation communities crossed by the Project. NPCs are groups of native plants that interact with one another and their environment in ways that have developed over time in response to local climate, soils, hydrology, disturbance regimes, and other ecological factors.

The Proposed Rights-of-Way intersect several NPCs, including prairie, forest, woodland, floodplain forest, and wetland communities (**Table 2.2-1**). NPCs are crossed by both Segment 1 and Segment 2, including Dry Bedrock Bluff Prairie and Mesic Prairie communities. Forested and woodland communities crossed by the Project include Oak-Shagbark Hickory Woodland, Red Oak-White Oak Forest, Sugar Maple-Basswood Forest, Swamp White Oak Terrace Forest, and Silver Maple Floodplain Forest. Wetland NPCs include Northern Bulrush-Spikerush Marsh.

TABLE 2.2-1

MDNR Native Plant Communities and Native Prairie Crossed by the Project

NPC Type
Segment 1
UPs13c – Dry Bedrock Bluff Prairie (Southern)
Segment 2
FDs38a – Oak – Shagbark Hickory Woodland
FFs59b – Swamp White Oak Terrace Forest
FFs68a – Silver Maple – (Virginia Creeper) Floodplain Forest
MHs37b – Red Oak – White Oak – (Sugar Maple) Forest
MRn93 – Northern Bulrush – Spikerush Marsh
UPs13c – Dry Bedrock Bluff Prairie (Southeastern)
UPs23a – Mesic Prairie (Southern)
Q-9
MHs39b – Sugar Maple – Basswood – Red Oak – (Blue Beech) Forest

Source: MDNR. 2026. MNDNR Native Plant Communities. Available online at: https://gis.data.mn.gov/maps/minnesota::mndnr-native-plant-communities-1/about. Accessed July 2026.
Note: Gray shading indicates native prairie communities.

2.2.3 Minnesota Biological Survey Sites of Biodiversity Significance

The Applicants reviewed mapping developed by the MDNR Minnesota Biological Survey (MBS) to identify Sites of Biodiversity Significance (SBS) crossed by the Project. SBS rankings reflect the relative significance of native biodiversity based on the quality, rarity, condition, and landscape context of native habitats and ecological features.

The Project intersects SBS areas ranging from Below to Outstanding significance (**Table 2.2-2**). Segment 1 crosses six SBS areas, including sites ranked Moderate and Below significance. Segment 2 crosses fourteen SBS areas, including two sites ranked Outstanding significance, two sites ranked High significance, and several sites ranked Moderate and Below significance. The Q-9 Reroute crosses one SBS area ranked Moderate significance.

TABLE 2.2-2

Minnesota Biological Survey Sites of Biodiversity Significance Crossed by the Project

Site Name	Ranking	Status
Segment 1		
Chester Woods – East	Moderate	Final
Mazeppa 10	Moderate	Final
Zumbro 11	Moderate	Final
Mazeppa 17	Below	Final
Mazeppa 22	Below	Final
Pine Island 13	Below	Final
Segment 2		
Beaver Creek	Outstanding	Final
Lodi 24	Outstanding	Final
Pickerel Slough	High	Final
Reno Bottoms (Running Slough)	High	Final
Cabbage Ridge North	Moderate	Final
Canton Township 15	Moderate	Final
Hayshore Lake	Moderate	Final
Mayville 36	Moderate	Final
Winnebago 9	Moderate	Final
Winnebago 13	Moderate	Final
Clayton 3	Below	Final
Frankford 6	Below	Final
Racine 28	Below	Final
Spring Grove 13	Below	Final
Q-9		
Twin Peaks Bluffs	Moderate	Final

Source: MDNR. 2026. MBS Sites of Biodiversity Significance. Available online at: https://www.arcgis.com/home/item.html?id=cfb2da4b8adb4fa88654cd6e7b604b9b#overview. Accessed July 2026.

Vegetation management activities within these areas will emphasize avoidance and minimization of disturbance where practicable, restoration using appropriate native vegetation, invasive species prevention, and maintenance practices that support long-term habitat function.

2.2.4 Calcareous Fens and Other Sensitive Wetland Systems

Calcareous fens are a rare wetland type characterized by groundwater discharge with high concentrations of dissolved calcium and other minerals. These unique hydrologic conditions support specialized plant communities and are protected under Minnesota Statutes §103G.223.

The closest fen is located approximately 0.25 mile from the Project; however, none would be directly crossed by the Project. Because calcareous fens are sensitive to changes in hydrology, groundwater flow, and adjacent land disturbance, they will be considered during final design,

construction planning, restoration, and vegetation management activities where appropriate to avoid direct and indirect impacts to fen functions and associated vegetation communities. The Applicants have initiated consultation with the MDNR regarding calcareous fens in proximity to the Project.

3 PROJECT COMPONENTS

Permanent vegetation conversion will primarily occur within structure footprints, foundations, access roads, switching station facilities, and areas maintained to meet electrical safety and reliability requirements. The transmission line will be designed and constructed in accordance with applicable safety, reliability, and avian protection standards, including Avian Power Line Interaction Committee (APLIC) guidelines.

3.1 TRANSMISSION LINE

The proposed structure type for the 765 kV single circuit and 765 kV / 161 kV double circuit will be steel lattice towers. The typical spans between structures will be approximately 1,200 to 1,500 feet, with shorter or longer spans used as needed. The footprint size for a typical tangent structure will range from 45 feet by 45 feet to 60 feet by 60 feet, with each of the four legs installed on drilled pier foundations ranging from 25 to 65 feet in depth. Larger foundations will be required for deadend and angle structures. Specialty foundations may be required due to geotechnical (or soil) conditions. Foundation type and depth will be based on site-specific conditions and detailed engineering design. The Applicants anticipate requiring up to a 250-foot-wide Right-of-Way. In some areas, the width may vary depending on span length and other design requirements.

For the short 161 kV rebuild sections into the Adams and Harmony Substations, Dairyland plans to reuse its existing 80-foot-wide Right-of-Way into and out of the substations, and extend the Right-of-Way by 20 feet for a 100-foot-wide Right-of-Way. Dairyland's Q-9 161 kV 1.2-mile relocated transmission line will also require a 100-foot-wide Right-of-Way. These lines will consist of steel monopole structures spaced 450 to 1,000 feet apart, on average. The structures will either be direct-embedded or installed on reinforced concrete foundations. In general, the excavated holes for each type of foundation will range from 4 to 6 feet in diameter and 20 to 50 feet in depth, or greater, depending on soil conditions. The method of installation, diameter and depth of the foundation will vary depending on the soil capability and structure loadings.

3.1.1 Temporary Workspaces

Temporary construction workspace beyond the Rights-of-Way may be required at certain locations, such as road or railroad intersections, utility crossings, along steep slopes, and at stringing locations. In addition, temporary staging of materials, such as structures and hardware, may occur in the Project area prior to construction installation, and temporary fly yards may be used to support aerial construction activities, where applicable. Temporary workspace will also be required adjacent to some structures where the direction of the line changes to allow for the pulling and stringing of the wires. The Applicants will avoid the placement of temporary construction workspace in wetlands and near waterbodies as practicable.

3.2 ASSOCIATED FACILITIES

The Project will include supporting telecommunications and electrical infrastructure associated with operation of the transmission system. Optical ground wire installed on the transmission line will provide communications capabilities for system operations. To maintain signal quality over

long distances, up to four fiber-optic signal repeater stations may be required along the transmission line right-of-way, with final locations determined during detailed engineering. To minimize additional disturbance, repeater stations will be located, where practicable, within existing substations, switching yards, or other developed utility facilities. The Project also includes a new 3.4-acre Jefferson Ridge Switching Station in Houston County. Minor upgrades to the existing Adams and Harmony substations will also be required. All planned substation modifications are anticipated to occur within existing facility boundaries.

4 GENERAL RIGHTS-OF-WAY VEGETATION MANAGEMENT

The Applicants' standard practice is to clear vegetation within the full Rights-of-Way width for construction of new transmission lines. The purpose of clearing to the full extent of the Rights-of-Way is to ensure adequate and safe working spaces for crews during construction, as well as to provide appropriate clearances for safe, reliable operation of the lines once construction is complete. There are very limited circumstances when this practice is modified and selected vegetation can remain within the Rights-of-Way provided National Electric Safety Code clearance requirements are met. The following is a list of general practices that will be used to minimize vegetation impacts related to Project construction.

- Prior to the commencement of clearing activities, flag or stake the boundaries of the Rights-of-Way, temporary workspaces and access roads in a manner that ensures all individuals can readily identify the boundaries of the authorized construction limits and to ensure that construction activities will only occur in authorized areas.

- Install signs or flagging for sensitive environmental features.

- Minimize soil disturbance in steeply sloped areas, as practicable.

- Where grading is required, strip the topsoil layer and segregate from subsoil layer and store separately within the Rights-of-Way.

- Limit traffic in the Rights-of-Way between transmission structure locations to a single access path to the extent practicable.

- Use BMPs to minimize the potential for spills or leaks from equipment during construction, including frequent inspections of equipment, requiring portable spill containment kits for construction equipment, ensuring that equipment operators are always present at the nozzle when fueling is in progress, and prohibiting the refueling of equipment in wetlands.

- Avoid placement of staging or laydown areas in wetlands, and immediately adjacent to wetlands to the extent practicable.

- Limit staging and laydown areas to previously disturbed areas where practicable.

- Locate, design, construct, and maintain access paths to minimize rutting, maintain surface and subsurface water flows in the wetland, and reduce erosion and sedimentation.

- Minimize rutting in wetland areas during construction activities by using construction mats, low ground-pressure equipment and/or conducting activities on firm or frozen ground that can support the equipment used.

- Where wetlands are to be crossed, create access through the shortest route within the wetland resulting in the least amount of physical impact to the wetland during construction.

4.1 VEGETATION REMOVAL

The Project will require the clearing of vegetation within the Rights-of-Way and along temporary construction workspaces and access roads. Through the operational life of the Project, tall woody vegetation that may interfere with safe construction and safe and reliable operation of the transmission line will be removed and managed.

Clearing of vegetation will occur prior to other construction activities as allowed by landowner agreements and permit conditions. Clearing may be accomplished with the use of chainsaws, mowers, and hydraulic tree-cutting equipment. Vegetation will be cut at, or slightly above, the ground surface. Rootstock or stumps will typically be left in place unless transmission structure installation or construction access requires otherwise, or at the request of the landowner.

Landowners will be notified prior to the initiation of clearing. The landowner will retain the title to all timber material, if desired. Non-merchantable material, including trees, brush, and slash, will be either cut and scattered, or placed in windrow piles within the Rights-of-Way. Non-merchantable felled material may also be removed from the Rights-of-Way in a fashion that does not cause erosion unless BMPs are installed.

4.1.1 Upland Vegetation Removal

The cut and scatter method, where understory trees, branches and brush are simply cut, sectioned into smaller pieces, and scattered across the site, may be used in areas where limited clearing is necessary, and access is challenging. The purpose of this method is to limit unnecessary equipment access and hauling which could potentially disturb existing ground or vegetation.

Woody vegetation may be slashed and scattered over the Rights-of-Way in non-agricultural upland areas.

4.1.2 Wetland Vegetation Removal

The use of heavy equipment in wetlands will be minimized to the extent practicable. Wetland impact minimization will be accomplished by:

- constructing in wetlands during frozen conditions to the extent feasible;
- working in dry conditions;
- using low ground-pressure tires or specialized tracked vehicles; and
- using matting when the ground is not frozen.

These BMPs are intended to minimize damage to wetland vegetation and soils.

Removal of trees and shrubs from forested wetlands may be necessary in some locations. The removal of woody vegetation within forested wetlands will be conducted in accordance with U.S. Army Corps of Engineers permit conditions. Within these areas, all trees and large shrub species will be cleared to ground level. Small diameter trees and shrubs will be cut and debris scattered in place. Large diameter trees and shrubs will be hauled out of wetland areas to suitable upland locations and treated according to applicable procedures. If the cut and scatter method is used

within wetland areas, no slash material will be left in the wetlands. Chipping or scattering of chips will not occur in wetlands.

Stump removal may occur within wetlands only where stumps interfere with the placement of construction mats or structure locations or pose a risk to construction tires and equipment. Where removal is required for access, stumps will be ground to a point at or slightly below the ground surface using low ground-pressure track-mounted equipment. Woody materials generated by stump grinding may be thin-spread in the wetland; but said material will not be mounded.

5 EROSION AND SEDIMENT CONTROL

The Applicants will limit ground disturbance activities to the extent practicable; ground disturbance will typically occur in areas around structures, along access roads where needed, and at the facilities, including the Jefferson Ridge Switching Station and at the existing substations. The Applicants will prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the Minnesota Pollution Control Agency (MPCA) Construction Stormwater General Permit (General Permit). As required by the General Permit, the SWPPP will describe the timing for installation of all erosion prevention and sediment control BMPs, including site plans that identify the location of temporary and permanent erosion and sediment control BMPs, and a description of the various types of BMPs that will be used based on field conditions. The SWPPP will identify receiving surface waters, including wetlands, and special or impaired waters. The SWPPP will also include a description of the permanent stormwater treatment system that will be installed at the new Jefferson Ridge Switching Station if one is required.

Temporary erosion prevention and sediment control BMPs, also referred to as erosion control devices (ECDs), include but are not limited to sediment barriers (e.g., silt fence, certified weed-free straw bales, bio-logs), filter socks, certified weed-free mulch, upslope diversions, slope breakers (earthen berms), and revegetation subsequent to seeding of exposed soils.

The Applicants will maintain ECDs as required in the Project construction documents and as required by all applicable permits, including the SWPPP.

Temporary ECDs will be installed prior to or at the same time as ground disturbing activities (e.g., grading, excavation) and will be maintained until permanent cover is established.

6 NOXIOUS WEEDS AND INVASIVE SPECIES

The Applicants will manage the potential for introduction and/or spread of invasive and noxious species (INS) because of the Project along the Rights-of-Way, temporary workspaces and access roads due to construction activities in compliance with law and regulation. Management strategies will be implemented where applicable and appropriate prior to construction, and during Project construction and restoration. This Plan defines terrestrial plant INS as any species that is listed by the Minnesota Department of Agriculture (MDA) as Prohibited Noxious Weeds. Specifically, this includes documented occurrences of terrestrial plant INS that are listed as “prohibited

eradicate"[3] or "prohibited control"[4] under the "Prohibited Noxious Weed" category by the MDA (see **Table 6-1**).

TABLE 6-1

Minnesota Department of Agriculture Prohibited Noxious Weeds

Eradicate List		Control List	
Species	Common Name	Species	Common Name
Ailanthus altissima	Tree of Heaven	*Berberis vulgaris*	Common Barberry
Amaranthus palmeri	Palmer Amaranth	*Cardamine impatiens*	Narrowleaf Bittercress
Centaurea diffusa	Diffuse Knapweed	*Carduus acanthoides*	Plumeless Thistle
Centaurea jacea [a]	Brown Knapweed	*Centaurea x moncktonii*	Meadow Knapweed
Centaurea solstitialis	Yellow Starthistle	*Celastrus orbiculatus*	Round Leaf Bittersweet
Cynanchum louiseae	Black Swallow-wort	*Centaurea stoebe*	Spotted Knapweed
Cynanchum rossicume	Pale swallow-wort	*Cirsium arvense*	Canada Thistle
Digitalis lanata	Grecian Foxglove	*Conium maculatum*	Poison Hemlock
Dipsacus fullonum	Common Teasel	*Euphorbia esula/virgata*	Leafy Spurge
Dipsacus laciniatus	Cutleaf Teasel	*Lythrum salicaria*	Purple Loosestrife
Heracleum mantegazzianum	Giant Hogweed	*Pastinaca sativa* [a]	Wild Parsnip
Humulus japonicus	Hooked hair Hops	*Phragmites australis* ssp. australis	Non-native Phragmites
Linaria dalmatica	Dalmatian Toadflax	*Polygonum cuspidatum*	Japanese knotweed
Lonicera japonica	Golden honeysuckle vine	*Polygonum sachalinese*	Giant knotweed
Microstegium viminuem	Stiltgrass	*Polygonum x bohemicum*	Bohemian knotweed
Sorghum halepense	Johnsongrass	*Tanacetum vulgare*	Common Tansy
Thladiantha dubia	Red Hailstone		

Source: MDA, 2026. Minnesota Noxious Weed List. Available at: https://www.mda.state.mn.us/plants-insects/minnesota-noxious-weed-list. Accessed July 2026.

6.1 STANDARD BEST MANAGEMENT PRACTICES

The Applicants will implement several standard BMPs that will limit the amount of disturbance associated with construction activities which will also help limit terrestrial INS infestations that could be caused by the Project within the Applicants' Rights-of-Way. The Applicants do not have the authority to treat INS outside of their Rights-of-Way. The Applicants will implement the following BMPs during construction:

- Limit grading and excavation to only areas necessary, such as the area surrounding structure foundations, the Jefferson Ridge Switching Station, and as needed along access roads and workspace areas for a level and safe working area.

- Install construction mats to minimize ground disturbance where appropriate based on field conditions.

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

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

- All disturbed areas will be revegetated using certified weed free seed mixes in accordance with regulations.

- Comply with the General Permit, including stabilization requirements, and inspection, maintenance and repair of erosion and sediment control BMPs. Certified weed-free straw or weed-free hay will be used for erosion and sediment control BMPs (see **Section 5**).

- Where practicable, equipment operating in documented populations of Prohibited Noxious Weeds will be cleaned prior to moving into non-infested areas

6.2 INVASIVE AND NOXIOUS SPECIES-SPECIFIC BEST MANAGEMENT PRACTICES

For locations where prohibited noxious weed populations are present within or directly adjacent to the Rights-of-Way or temporary construction areas the following additional BMPs may be implemented:

- Record location (using GPS) and approximate size of infestation.

- Develop avoidance plan if practicable (i.e., limit vehicle travel to other non-infested parts of the Rights-of-Way, adjust off Rights-of-Way access routes to avoid).

- Prevent seed production and spread (e.g., mow seed heads, apply herbicide).

- Use BMPs specific to each species of noxious weed to carry out control measures.

- Monitor high-risk areas (areas reduced to bare soil where seeding has not yet established) and implement appropriate BMPs if INS are found.

- Monitor sensitive plant communities (high-quality wetlands, mapped NPCs, Sites of High or Moderate Biodiversity) and coordinate with MDNR on treatment if INS are found.

If INS infestations are observed along the Rights-of-Way, the Environmental Inspector (EI) will coordinate with the Applicants to implement appropriate actions. The Applicants will monitor areas where seeding and erosion control measures have been implemented and will follow up with reseeding measures where vegetative cover by the specified seed mix, or revegetation by the local, native seed source is inadequate to provide long term stability and sustainable NPCs (see **Section 8**).

6.3 INVASIVE TREE PESTS

Invasive tree pests occur in the Project area, including the non-native emerald ash borer (*Agrilus planipennis*). Emerald ash borer larvae feed on all species of ash trees. Most of the species' life cycle occurs underneath the bark; early indications of infestation are bark removal or flecking from woodpeckers that eat the larvae. The Project occurs in the quarantine area for the emerald ash borer.

In accordance with this quarantine, the Applicants will not transport felled ash (genus Fraxinus) trees or any processed parts (i.e., logs, chips, mulch, stumps, roots, branches) from a quarantine to a non-quarantine area.

6.4 OAK WILT

Oak wilt is caused by a non-native invasive fungus (*Bretziella fagacearum*), which invades and eventually kills the oak tree. Oak wilt has been identified in all six counties crossed by the Project. Trees are most susceptible to the spread between April 1 and July 15. Outside of this timeframe, if daily high temperatures exceed about 60 degrees Fahrenheit or higher for six consecutive days, spread can occur. If a healthy oak tree adjacent to the construction workspace is damaged during construction activities during the restriction period, the Applicants will treat the cut surface with water-based paint, a pruning/wound sealer, or shellac to prevent further spread of the disease.

7 HERBICIDE APPLICATION

Herbicides may be used within the Rights-of-Way to control regrowth of woody species, prevent the re-sprout of the stumps of tall-growing tree species or to control listed INS, unless a landowner or land-managing agency has specified that no herbicides are to be used on their property. All herbicide use will be in accordance with manufacturer's specifications and all applicable federal and state regulations. The contractor applying herbicide will be required to obtain any necessary permits and/or certifications prior to herbicide placement and will be required to keep proper documentation of location and timing of herbicide use. Treatment shall conform to manufacturers' specifications.

Landowners, operators of organic farms on adjacent parcels, and bee apiary operators within three miles will be notified 14 days in advance if herbicides will be used on the Rights-of-Way. The notice will indicate what herbicides will be used and the methods of application (e.g., broadcast, selective spot treatment, or basal treatment).

Herbicides used within or near wetlands or waterbodies must be:

- designed for use in wet areas as designated by manufacturer's specifications and federal and state regulations; and

- be used in accordance with manufacturer's specifications as well as all applicable federal and state regulations.

Areas of high public exposure such as wells, sinkholes, rivers and streams, lakes and reservoirs, and U.S. and state highways shall be treated with a selective basal or backpack application and will follow the manufacturer's specifications regarding buffer distances from sensitive features.

7.1 ORGANIC FARMS

The U.S. Department of Agriculture Organic Integrity Database lists 97 registered organic farms in the six-county area. Fillmore County has the most with 29. However, because organic farmers are not required to register, there could be additional, unregistered organic farms within the Project area. In addition, organic farm registration does not give the precise location of organic fields, only the registrant's mailing address. Special practices would be adhered to within and adjacent to these organic agricultural lands. These practices are described in the Applicants' Agricultural Impact Mitigation Plan.

8 SEEDING AND REVEGETATION

Portions of the Rights-of-Way may remain active for multiple seasons and construction phases. Temporary stabilization measures may be used until final construction activities in a given area are complete and final restoration can occur.

Because of the linear nature of transmission line projects, there are typically many different landcover types and plant communities impacted by Project construction. In general, restoration is likely to be consistent with historic vegetation and use, where practicable and consistent with safe and reliable transmission line operation.

8.1 SEEDING METHODS

Seed will be applied uniformly at specified rates by broadcasting, hydroseeding, or, in rare cases, drill seeding. The Applicants will ensure that the seeding equipment is appropriate for the seed mix and is capable of dispensing seeds without plugging or unevenly distributing the seed. Soil disturbance will primarily occur at structure locations where foundations are installed, and at graded access roads. To minimize ground disturbance along the entire right-of-way, forested areas will be cleared, but roots and stumps will typically be left in place. Within areas of cleared forest, it may not be practical to access large areas of ground with seeding and seedbed preparation equipment. In these areas, smaller vehicles may be required to perform tasks such as preparing seedbeds with small rakes, and surface packing after seeding. Activities will be suspended if conditions are such that equipment will cause rutting of the surface in the designated seeding areas.

Broadcast seeding may be used at disturbed areas where bare soil is created. Broadcast seeding will be accomplished by a mechanical, hand-operated seeder, or in small seeding areas, by hand. Following seeding, the surface is to be raked with a cultipacker, harrow, or hand rake. The bed is to be firmed as appropriate to site conditions.

Hydroseeding may be used at disturbed upland areas where bare soil is created. Hydroseeding is not approved in wetland locations as the method requires extra access by heavy vehicles. Hydroseeding will occur at rate specified in the mixture tabulation for the specified mix. Seed will be applied in a broadcast, hydromulch slurry. The hydromulch seed mix will allow the contractor to see where application has taken place, ensuring uniform coverage of the seeding area. The hydroseeder must provide for continuous agitation of slurry and provide for a uniform flow of slurry. Hydroseed slurry is not to be held in the tank for more than one hour prior to application. Hydromulch and liquid tackifier products containing plastic/polypropylene fiber additives and Malachite Green (colorant) will not be utilized on this Project.

Seed drilling may be used in areas where stumps have been removed and a prepared seed bed can be created. However, these areas are expected to be infrequent. Drilled seed will be sown at a depth of 0.25 inches. Seeding equipment will be able to accommodate and uniformly distribute different sizes of seed at the required depth. Feeding mechanisms will be able to evenly distribute different seed types at the rates specified. Seedbed soil is to be suitably firmed immediately following seed drilling.

8.2 TEMPORARY REVEGETATION

Temporary cover and/or seeding may be used as a means to minimize soil erosion and reduce the potential for the establishment of INS. Temporary seed mixes are considered a cover crop

and are made up of annual grasses, have rapid germination, and provide quick ground cover. These seed mixes are not intended to provide multi-year cover. Unless specifically requested by landowners or regulatory agencies, the Project will not establish temporary vegetation on cultivated land or in inundated areas. The Applicants' temporary seed mixes were developed based on BWSR seed mixes (**Table 8.2-1**). These seed mixes are available from the BWSR website: **https://bwsr.state.mn.us/seed-mixes**.

TABLE 8.2-1

Temporary Cover Crops

Seed Mix	Purpose
Oats Cover Crop (21-111)	Temporary cover crop for spring and summer plantings
Winter Wheat Cover Crop (21-112)	Temporary cover crop for fall plantings
Soil Building Cover Crop (field pea/oats) (21-113)	Temporary crop with soil building function

Source: BWSR. 2026. Seed Mixes | MN Board of Water, Soil Resources (state.mn.us). Accessed July 2026.

8.3 PERMANENT REVEGETATION

Permanent vegetation will be established in areas disturbed within the Rights-of-Way or temporary workspaces, or along access roads (e.g., graded areas) that are to be restored to pre-construction conditions, except in actively cultivated areas and standing water wetlands. In many cases natural revegetation by early successional native species following tree clearing is expected to occur. In areas where native species voluntarily revegetate the Rights-of-Way, active restoration may not be required. In areas of minimal disturbance, vegetation will be allowed to regenerate naturally. Where standing water is not present, and where surrounding vegetation is dominated by abundant native species, the seeding of bare soils with temporary cover crop seed mix may be sufficient for cover while native species revegetate the area.

The seed mixes shown in **Table 8.3-1** for permanent seeding include a number of potential BWSR seed mixes that may be used and are suitable for southeastern Minnesota and the Eastern Broadleaf Province, where the entire Project is located. The table includes seed mixes for a variety of habitats that may occur within the Project area which can increase diversity, create competition for invasive species, and promote plant community resiliency. These seed mixes are available on the BWSR website: **https://bwsr.state.mn.us/seed-mixes**. This list will be further refined based on the final Project design.

If a particular seed mix is unavailable from the supplier at the time of purchase, a similar BWSR mix for the same purpose will be substituted. The seed mixes also include additional information regarding suitable site conditions, site preparation, compatible temporary cover crops, seeding dates, and INS management methods recommendations.

TABLE 8.3-1

Permanent Seed Mixes

Seed Mix (State Seed Code)	Suitable Site Conditions	Benefits
Upland Mixes		
Dry Prairie Southeast (35-622)	Areas with mesic soils and full sun for at least 70% of the day where land is being converted from other uses such as agriculture or non-native grasses to a prairie reconstruction.	Wildlife habitat and soil stabilization, water quality benefits, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Mesic Prairie Southeast (35-642)	Areas with mesic soils and full sun for at least 70% of the day where land is being converted from other uses such as agriculture or non-native grasses to a prairie reconstruction.	Wildlife habitat and soil stabilization, water quality benefits, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Woodland Edge South & West (36-212)	Areas with dry to mesic soils and part sun for at least 50% of the day where land is being converted from other uses such as lawn, or agricultural fields like row crops or pasture.	Partly shaded grassland planting for native roadsides, reclamation, etc., carbon sequestration, wildlife habitat, emission reductions, water quality
Wetland Mixes		
Wetland Rehabilitation (34-172)	Areas with soil saturation within a foot of the surface during a majority of the growing season and full to partial sun where a wet meadow plant community is the goal. The mix is intended for wetlands where restoration projects need supplemental seeding or sites where there is some establishment from the seedbank, but additional cover of native wetland species is needed.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Wetland Seedbank Release (31-271)	This mix was developed for wetland restoration projects in Northeast Minnesota with a focus on wet meadows where there is a high likelihood that seeds of native species will be in the seedbank and there is a need for a seed mix to supplement the seedbank, improve cover of bare soils and increase diversity.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Wet Meadow South and West (34-272)	Areas with soil saturation within a foot of the surface during a majority of the growing season and full to partial sun where land is being converted from other uses such as agriculture or non-native grasses to a wetland restoration.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Wet Prairie (34-266)	Areas with soil saturation within a foot of the surface during a majority of the growing season and full to partial sun where land is being converted from other uses such as agriculture or non-native grasses to a wetland restoration. This mix is most often used as part of prairie pothole restoration projects. The mix is similar to wet meadow mixes but includes an increased percentage of prairie species such as prairie cordgrass, big bluestem and some prairie forbs.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Riparian Mixes		
Early Successional Floodplain (34-161)	Areas with floodplains of rivers and streams and full to partial sun. This seed mix is commonly used where land is being converted from other uses such as agriculture or non-native grasses. The seed mix has relatively low diversity and low cost as it is designed for projects where natural colonization of grasses, sedges, forbs and woody vegetation is expected following flooding.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat

TABLE 8.3-1

Permanent Seed Mixes

Riparian South & West (34-265)	Riparian areas along rivers, streams and other waterbodies in the southern and western parts of Minnesota with areas of moist soils and potential flooding during part of the growing season and full to partial sun where land is being converted from other uses such as agriculture or non-native grasses to riparian plants.	Wildlife habitat, restoration of wetland functions, and water management, carbon Sequestration, emission reductions, pollinator habitat, songbird habitat
Low Diversity Buffer General (32-243)	Areas where land adjacent to a stream, wetland or lake is being converted from other uses such as agriculture or non-native grasses to a native prairie reconstruction.	Water quality benefits, soil stabilization and wildlife habitat, carbon Sequestration, emission reductions, pollinator habitat (potential, depending on placement), songbird and other non-game wildlife habitat
Mid Diversity Mesic to Dry Buffer South & West (32-231)	Areas with mesic to dry soils adjacent to a stream, wetland or lake is being converted from other uses such as agriculture or non-native grasses to a native prairie reconstruction.	Water quality benefits, soil stabilization and wildlife habitat, carbon Sequestration, emission reductions, pollinator habitat (potential, depending on placement), songbird and other non-game wildlife habitat
Hybrid / Specialty Mixes		
Native Construction General (32-242)	Constructed components of restoration projects such as embankments, berms, ditch plugs and other areas of construction. The mix contains a combination of moist soil and upland species to accommodate a variety of hydrology conditions. The mix also includes a combination of early, mid and late successional species.	Soil stabilization, wetland functions, and water management, wildlife habitat
Dry Swale / Pond (33-262)	Temporarily flooded swales in agricultural settings	Swales in agricultural fields
Stormwater South and West (33-261)	Stormwater pond edges, temporarily flooded dry ponds, and temporarily flooded ditch bottoms	Edge of stormwater pond, ponds or ditch bottoms that are temporarily flooded
Beneficial Insects South and West (38-542)	Areas with mesic soils and full sun for at least 70% of the day where land is being converted from other uses such as lawn, or agricultural fields like row crops or pasture.	Terrestrial habitat for pollinators and other invertebrates and improve habitat for beneficial soil organisms, diverse plant structure and composition, carbon sequestration, upland game habitat
Pollinator Plot Urban Southeast (38-631)	Areas with mesic soils and full sun for at least 70% of the day where land is being converted from other uses such as lawn, or agricultural fields like row crops or pasture.	Terrestrial habitat for pollinators and other invertebrates and improve habitat for beneficial soil organisms, diverse plant structure and composition, carbon sequestration, wildlife habitat, emission reductions with conversion to perennial vegetation
Pollinator Plot Southeast (38-641)	Areas with mesic soils and full sun for at least 70% of the day where land is being converted from other uses such as lawn, or agricultural fields like row crops or pasture.	Terrestrial habitat for pollinators and other invertebrates and improve habitat for beneficial soil organisms, carbon sequestration, wildlife habitat, emission reductions

Source: BWSR. 2026. Available online at: https://bwsr.state.mn.us/seed-mixes. Accessed July 2026.

8.3.1 Permanent Seeding of Upland Areas

Permanent seeding will take place following completion of construction activities in an area. The Project primarily occurs within agricultural areas and along existing transmission line rights-of-way. The Applicants do not intend to seed actively cultivated areas; however, the Applicants will seed with temporary cover crops identified in **Table 8.2-1** or other mixes at the landowner request. In landscaped / lawn areas, the Applicants will use turf grass seed mixes requested by the landowner. Roadside areas may be reseeded with seed mixes in **Table 8.3-1** consistent with the

current vegetation community, unless otherwise agreed upon with the landowner and / or road authorities.

The use of mixes with pollinator species will be considered based on appropriateness for the location/site, and landowner preference.

8.3.2 Permanent Seeding of Wetland Areas

The Project will cross wetlands consisting of forested, shrub-scrub and emergent wetland types; however, grading within wetlands is not anticipated. Limited disturbance to vegetation may occur where construction mats are installed. In wetlands, the preferred method for revegetation of disturbed areas is reliance on revegetation by resident plant communities. However, supplemental seeding may be beneficial at some locations to improve cover of bare soils and increase diversity. Where monitoring indicates that natural revegetation is inadequate to provide stabilization, supplemental seeding may be implemented.

If necessary, the Applicants will use a wetland seed mix in **Table 8.3-1** that corresponds to the native vegetation community to seed large bare soil disturbance areas (i.e., greater than 50 square feet of exposed soils that is greater than two feet wide). No fertilizer, lime, or mulch will be applied in wetlands.

8.3.3 Ecologically Significant Areas

As described in **Section 2.2**, the Project crosses the USFWS Upper Mississippi NWFR, conversation easements, public lands and waters, NPCs, SBS, and is in proximity to calcareous fens. Specialty seed mixes identified in **Table 8.3-1**, such as pollinator seed mixes, may be used at these locations during restoration. The Applicants have initiated coordination with the USFWS, MDNR, and BWSR and will continue to refine the Project design to avoid and minimize impacts to these areas, including the identification of appropriate seed mixes.

The MDNR recommends the following actions to minimize disturbance at NPCs and SBS:

- Avoid SBS Sites and native plant communities ranked S1, S2, or S3 to the extent practicable.
- Minimize vehicular disturbance in SBS Sites (allow only vehicles/equipment necessary for construction activities).
- Do not park equipment or stockpile supplies in the SBS Sites.
- Do not place spoil in SBS Sites or other sensitive areas.
- Impacts to SBS Sites and native plant communities should be addressed in the VMP.
- If possible, conduct the work under frozen ground conditions.
- Use effective erosion prevention and sediment control measures.
- Inspect and clean equipment prior to operation and follow recommendations to prevent the spread of invasive species.
- Revegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible.
- Use only weed-free mulches, topsoils, and seed mixes. Of particular concern are birdsfoot trefoil (*Lotus corniculatus*) and crown vetch (*Coronilla varia*), two invasive species that are sold commercially and are problematic in prairies and disturbed open areas.

Native prairie boundaries will be identified during final design and construction planning, and vehicle travel, staging, and temporary workspaces within native prairie will be minimized where

practicable. If impacts to native prairie cannot be avoided, the Applicants will coordinate with the MDNR regarding development of a Prairie Protection and Management Plan consistent with permit requirements.

9 MONITORING

During construction the EI and/or stormwater inspector will monitor the site for establishment of vegetation (temporary and permanent) and occurrences of INS. After construction, the Applicants will continue to inspect areas where seeding and temporary erosion and sediment control measures are in place in accordance with the General Permit. The Applicants will implement corrective actions where low germination or establishment, and/or high weed competition is identified. The Applicants will continue to inspect their Rights-of-Way until permanent cover is established in accordance with the General Permit. The Project Rights-of-Way will be monitored until permanent cover is achieved.

10 OPERATION AND MAINTENANCE

The Applicants' primary goal is to construct the Project and then operate and maintain the Project and their Rights-of-Way in a manner that ensures a safe and reliable transmission line.

In response to widespread outages in the United States in the early 2000s, Congress enacted the Energy Policy Act of 2005, which authorized the Federal Energy Regulatory Commission (FERC) to certify an Electric Reliability Organization (ERO) to create mandatory, enforceable reliability standards; the standards are subject to FERC review and approval. FERC subsequently designated NERC as the ERO tasked with developing and enforcing standards to ensure the reliability of the transmission system in North America. NERC's standards are developed using a results-based approach that focus on performance, risk management, and entity capabilities, and using an American National Standards Institute-accredited process that ensures the process is open to all persons directly and materially affected by the reliability of the North American bulk power system.[5]

More specifically, NERC developed its Reliability Standard FAC-003 Transmission Vegetation Management Program and began enforcement of that standard in 2007. In recognition of the fact that failure to address vegetation requirements can cause major power outages and injury, NERC is authorized to assess regulatory penalties for non-compliance. This standard is updated from time to time and is reviewed and approved by FERC, just like other NERC reliability standards. NERC has determined that "[m]ajor outages and operational problems have resulted from interference between overgrown vegetation and transmission lines located on many types of lands and ownership situations" and that adhere to standard requirements "will reduce and manage this risk."[6] The purpose of the NERC standard is:

> *To maintain a reliable electric transmission system by using a defense- in-depth[-]strategy to manage vegetation located on transmission rights of way and minimize encroachments*

[5] See NERC, *Standards*, available at https://www.nerc.com/standards/reliability-standards.

[6] NERC. 2025. FAC-003-4 Transmission Vegetation Management. Available online at https://www.nerc.com/pa/Stand/Reliability%20Standards/FAC-003-4.pdf.

> *from vegetation located adjacent to the right-of-way, thus preventing the risk of those vegetation-related outages that could lead to Cascading.*[7]

For transmission lines subject to NERC standards, compliance with these standards is required. And, even for transmission lines which are not subject to NERC standards, ensuring safe and reliable construction and operation is paramount. The purpose of this VMP is to meet the objective of a safe and reliable transmission line, consistent with applicable laws, permits, and other requirements, while also minimizing human and environmental impacts associated with vegetation management to the extent possible.

10.1 ROUTINE INSPECTIONS AND MAINTENANCE

The Applicants will require access to the transmission line Rights-of-Way to periodically conduct inspections, perform maintenance, and repair damage that may occur. Generally, the Applicants will inspect the Project at least once by air and once by ground annually. These inspections will be limited to the defined easement areas and through other access easement areas where obstructions or terrain dictate. If maintenance concerns are identified during inspection, repairs will be performed as necessary.

The Applicants will periodically clear vegetation from the Rights-of-Way to maintain a safe and accessible right-of-way, and to allow access for maintenance activities or emergencies. Clearing typically includes brushing equipment traveling down the Rights-of-Way, which may consist of tracked or rubber-tired equipment to cut brush and trees, hand-held saws, or other manual methods. Small cuttings will be left in place, non-merchantable timber or slash will be disposed of where it originates, hauled off-site, or chipped and evenly spread on the Rights-of-Way.

10.2 FALL LINE TREES

The Applicants will cut all trees which may strike line facilities, including stub, guy and anchor facilities, based upon the application of a standard fall line calculation through an average 6-year growth horizon of the species identified adjacent to the Rights-of-Way. Danger trees are typically any tree that is leaning, damaged, having poor root structure, or showing signs of internal decay such that the Applicants' Right-of-Way inspectors believe all or portions of the tree may fall into the transmission line. The Applicants' easements authorize the removal of danger trees outside of the Rights-of-Way. Danger tree removal is a critical aspect of ensuring transmission line reliability and fire prevention. Healthy trees located outside of the Rights-of-Way with a limited number of limbs and branches that extend within the Rights-of-Way may be trimmed such that the limbs are completely removed from the Rights-of-Way.

10.3 EMERGENCIES

It may be necessary for the Applicants to cut, trim or remove vegetation due to damage caused by weather events or accidents. Such work is typically done to facilitate restoring services on the line. The Applicants will attempt to notify the landowner prior to entering the property.

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[7] NERC. 2025.