# FORKS 161 kV SWITCHING STATION AND FORKS-ROST 161 kV TRANSMISSION LINE PROJECT

## ITC Midwest LLC

## Vegetation Management Plan

## Docket Number

## ET6675/TL-24-232

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## 1.0 INTRODUCTION

ITC Midwest LLC (ITC Midwest) is applying to the Minnesota Public Utilities Commission (Commission) for a Route Permit to construct a new 161 kilovolt (kV) transmission line (the Project) from the new Forks Switching Station to the new Rost Substation in Jackson County, Minnesota[1]. The Project will include the construction of the new Forks Switching Station southwest of the City of Lakefield, Minnesota, and a new approximately 8.5 mile long 161 kV high voltage transmission line from the new Forks Switching Station to the new Rost Substation to be permitted separately and constructed by Great River Energy, east of the City of Worthington, Minnesota. The Project is located entirely in Jackson County, Minnesota in Ewington and Rost Townships.

## 2.0 PLAN OVERVIEW

ITC Midwest has developed this Vegetation Management Plan (VMP) for the Project to address an anticipated Route Permit condition from the Commission for the Project related to vegetation management.

The primary goal of this VMP is to construct the Project and maintain the Project right-of-way (ROW) in a manner that ensures a safe and reliable transmission line. In addition to the primary goal stated above, this VMP also addresses the following goals:

- Develop and maintain cooperative relationships with landowners along the ROW to accommodate reasonable requests and preferences related to ROW vegetation management.
- Comply with applicable requirements in federal, state, and local permits, licenses, and/or easements[2].
- Limit the introduction and spread of noxious weeds and invasive species (NWIS) due to the Project.

This VMP reflects vegetation management practices that are consistent with applicable North American Electric Reliability Corporation (NERC) requirements, as well as requirements set by the Commission. This VMP also incorporates, where applicable, the Minnesota Department of Commerce's Generic Vegetation Establishment and Management Plan Guidance.

## 3.0 SITE DESCRIPTION

### 3.1 EXISTING CONDITIONS

ITC Midwest has asked the Commission to approve a Proposed Route with a width of 1,500 feet (750 feet on either side of the proposed transmission centerline). At a minimum, the Project will have a ROW that is 100 feet wide (typically 50 feet on each side of the transmission centerline).

The Proposed Route includes open agricultural areas, scattered small, forested areas, rural residential development, and hydrologic features, including streams, wetlands, and small ponds[3].

[1] Project maps are included in the Environmental Assessment and in Appendix B of the Route Permit Application
[2] Refer to Section 8.0 of the Route Permit Application for a list of permits and approvals that may be required for the Project.
[3] Pre-settlement vegetation is described in Section 4.10.4 of the Environmental Assessment.

Surface elevations within the Proposed Route range from 1,406 to 1,489 feet above sea level. Slopes vary throughout the Proposed Route, but the terrain is predominantly flat.

Detailed information on existing conditions, including land use, land cover, water resources, flora and fauna, can be found in the Environmental Assessment prepared by the Department of Commerce, Energy Environmental Review and Analysis and the Route Permit Application submitted by ITC Midwest (MPUC Docket No. ET6675/TL-24-232). ITC Midwest will obtain a Utility Crossing License for any crossings of Public Water Inventory (PWI) waters.

## 3.2 SENSITIVE ECOLOGICAL AREAS

The Minnesota Biological Survey (MBS) has identified one or more Sites of Biodiversity Significance within or adjacent to the Project boundary. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape.

One or more calcareous fens have been documented in the vicinity of the proposed Project[4]. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away. Calcareous fens are fragile and may be impacted by stormwater runoff, any activity within the fen, or any activity that affects groundwater hydrology including groundwater pumping, contamination, or discharge).

Based on review of the Minnesota Department of Natural Resources (MnDNR) Natural Heritage Information System (NHIS) data, the identified calcareous fen is located approximately 6.5 miles northeast of the Project's Route.

During field wetland delineation surveys, ITC Midwest will document any calcareous fens within the Project area and, if present, prepare a fen management plan. ITC Midwest will coordinate with MnDNR to obtain a no-effect concurrence determination prior to construction.

## 3.3 PROJECT COMPONENTS.

### 3.3.1 Transmission Line Right-of-Way

Once a Route Permit is issued, ITC Midwest land agents will work directly with individual landowners to acquire the necessary easements for the Project. At a minimum, the Project will require a total ROW of 100 feet wide (typically 50 feet on each side of the transmission centerline).

### 3.3.2 Switching Station

The new switching station will consist of a graded and fenced, gravel pad housing various equipment necessary for the transmission system.

### 3.3.3 Temporary Construction Areas

[4] Refer to MnDNR Natural Heritage Review Letter.

Temporary construction areas can include wire stringing areas, off ROW access routes, and laydown yards. These areas are used for material storage, ROW access, and equipment access to support construction activities. Leases or easements will be acquired for these areas, if necessary. The location of any temporary construction areas will be identified in the Project design plans as well as the Project Stormwater Pollution Prevention Plan (SWPPP).

## 4.0 RIGHT-OF-WAY PREPARATION AND CONSTRUCTION

Detailed descriptions of ITC Midwest's ROW preparation and construction methods are included in the Route Permit Application[5].

### 4.1 LANDOWNER NOTIFICATION

Landowners will be notified prior to clearing activities, as required by applicable permit conditions. Among other things, the notification letter will inform landowners:

- The ROW will be staked indicating the extent of clearing activities.
- Landowners can request to keep any of the trees and materials. Requested wood will be cut to no less than 8-foot segments. Requested whole trees, trunks, wood chips or mulch will be placed just outside of the ROW in an upland area and at a location on the Landowners' property for the materials to be hauled away by the Landowner.
- All unwanted woody materials will be removed from the landowner's property.
- Herbicides to prevent regrowth of woody vegetation may be used, the method of application, and the opportunity for them to request that no herbicides be used.

### 4.2 INITIAL RIGHT-OF-WAY CLEARING

It is the standard practice of ITC Midwest to remove all woody vegetation within the right- of-way for the construction of new high voltage transmission lines. Tree removal is not anticipated for the Project; however, this cannot be confirmed until Project design has been finalized. Such vegetation may interfere with or restrict safe construction of the transmission line. Cleared rights-of-way provide for safer working conditions and necessary access for large construction equipment including trucks, cranes, and boom lifts. A cleared ROW also minimizes conflicts for stringing operations. Vegetation will be limited to the permanent ROW, temporary ROW, danger trees off ROW, and off-ROW access. Prior to construction, ITC Midwest will mark the boundaries of wetlands and waterways.

To the extent the Project schedule allows, vegetation clearing will be conducted on firm or frozen ground to minimize rutting and soil erosion. If schedules or weather do not allow for work on firm ground, construction mats will be used as necessary to prevent rutting and erosion. Low ground pressure equipment will be used in sensitive natural areas and wetlands to prevent soil disturbance and compaction. If necessary, clearing of trees would occur during the Northern long-eared bat inactive season between November 15 through April 1st.

Mechanical equipment such as feller bunchers or brush cutters may be used for clearing. In areas where clearing with large equipment is not viable, clearing will be done with hand tools such as chain saws.

[5] Refer to Section 5.0 of the Route Permit Application.

Vegetation within the ROW will be cut at or slightly above the ground surface depending on terrain. Any tree stumps or surface roots in managed turf grasses will be ground to slightly below grade and the hole backfilled with dirt and seeded with a similar turf grass mixture. Any stumps outside of managed turf grass areas will typically be cut or ground such that no more than two inches remain above grade depending on terrain. ITC does not typically grub stumps or roots to minimize soil impacts and erosion potential. To the extent there is tree removal, stump treatment herbicide may be applied to the cambium layer of stumps from tree removal. The herbicide is applied directly to the stump with a hand wand to prevent off site or non-target species kill. This application will kill the root system of the tree to prevent resprouting and is an effective tool for many common, fast-growing tree species. Additional herbicide application details are provided in Section 5.0.

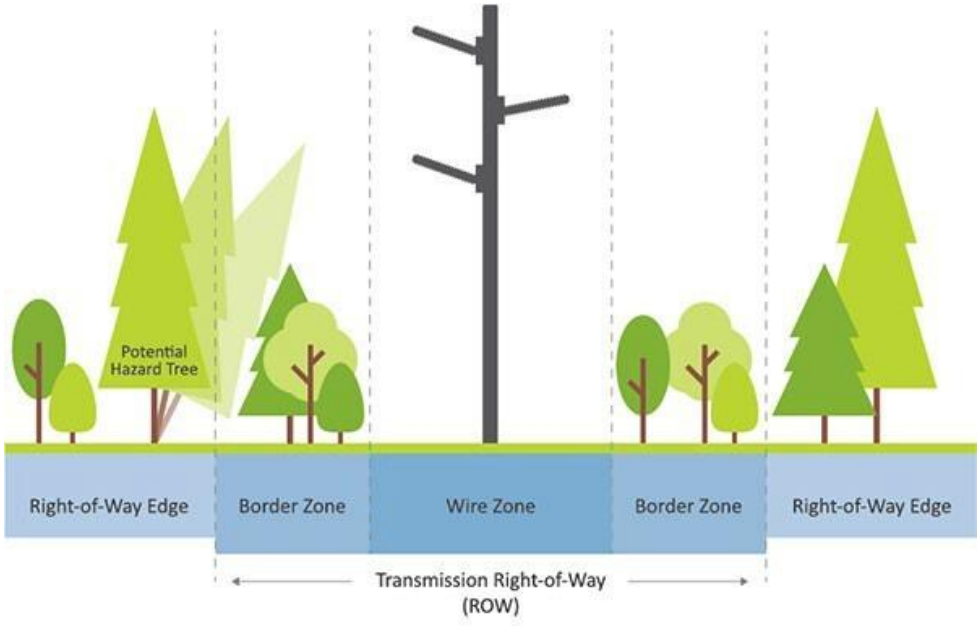
Trees, trunks and/or limbs cut on private property are typically cut to approximately 8-foot lengths unless the landowner requests longer lengths.

Trees (>6 inches diameter at breast height (dbh) or >20 feet tall) cut from a wetland will be moved outside of the wetland. If the materials will be chipped or shredded, that work will be completed outside of wetlands.

All materials a landowner has requested to keep will be stacked outside the ROW in an upland area for the Landowner to haul away at their expense. All materials a landowner does not wish to keep will be stacked inside the ROW for further processing and disposal.

Any materials a landowner does not wish to keep will be removed from their property. These unwanted materials may be placed in a composting site, or disposed of at landfill.

**Figure 4.2-1 – Standard Vegetation Management Practices**




## 4.3 BEST MANAGEMENT PRACTICES

All work will comply with the SWPPP developed to comply with the Minnesota Pollution Control Agency's (MPCA) Construction Stormwater permit. The SWPPP will define best management practices (BMPs) for erosion and sedimentation prevention and mitigation. Due to entanglement

issues with small animals, use of erosion control blanket

shall be limited to 'bionetting' or 'natural netting' types and specifically not products containing plastic mesh netting or other plastic components.

The SWPPP will include a site-specific plan detailing where erosion and sediment controls will be implemented throughout the Project. These controls may include silt fencing, straw wattles, vegetative buffers, and other measures, as deemed necessary by the certified SWPPP preparer. Per MPCA requirements, a certified SWPPP inspector will inspect the Project once every seven days and after significant rainfall events. The purpose of the inspections will be to monitor the effectiveness of BMPs and to identify any corrective actions needed to maintain permit compliance.

## 5.0 HERBICIDES

Landowners within the Project ROW will be notified at least 14 days in advance if herbicides will be used on the ROW. The notice will indicate what herbicides will be used and the methods of application (e.g., broadcast, selective spot treatment, or basal treatment).

Herbicides may be used during vegetation removal or maintenance to control the re- sprout of stumps of incompatible species or to control invasive or noxious weed species. If a landowner prohibits their use, herbicides will not be used on that landowner's property. ITC Midwest will consult with agencies regarding the use of herbicides in areas of their permit authority. Herbicides will not be used within 75 feet of the vegetative buffer zone of waterbody crossings, unless approved prior to use. Herbicides will be used in accordance with the manufacturer specifications and all applicable federal and state regulations. All herbicide applicators on the Project must be certified herbicide applicators. Herbicides used in or near wetlands and waterbodies must be designated for use in wet areas as identified by manufacturer specifications and allowed by federal or state regulations. Herbicide will not be applied when local wind speeds exceed 10 miles per hour. Herbicides will also not be applied during rainy conditions or when soils and vegetation is water saturated.

## 6.0 NOXIOUS WEEDS AND INVASIVE SPECIES CONTROL

During all phases of Project activities including clearing, construction, operation and maintenance, the Project will minimize the introduction and spread of noxious weeds and invasive species (NWIS) along the ROW by implementing BMPs that discourage the spread of identified species (including plant species, pests and fungi), and routine cleaning of equipment to remove dirt and plant debris. The goal is to prevent new infestations on the ROW as a result of construction activities. It is important to note that there may be NWIS already existing on private parcels along the ROW. While this does not preclude the Project from responsibility for managing the spread of invasive species, this ability may be limited by pre-existing conditions.

ITC Midwest has identified the following mitigation measures to be implemented that should prevent the introduction of NWIS on lands disturbed by construction activities. The methods discussed in this section relate only to construction and restoration activities and not vegetation maintenance activities.

- To prevent the introduction and spread of NWIS into the project area from offsite locations, equipment will be cleaned prior to arrival onsite. Visible dirt must be removed from all equipment using high pressure compressed air blowers or brushing.

- The contractor(s) must maintain record of cleaning for each piece of equipment used onsite. This information will be available upon request.
- Non-compliance with equipment cleaning requirements may warrant a stop work order to be issued. Construction activity could then recommence only after project equipment has been removed from the site, and adequately cleaned.
- Only weed-free materials (e.g., straw bales, bio-rolls, mulch) will be used in erosion control and only weed-free seed will be used during revegetation.
- Equipment and clothing will be inspected for invasive materials.
- Collected invasive materials will be secured and disposed of at an offsite location to avoid dispersal.
- Minimally disturbed areas will be allowed to restore naturally with landowner approval.
- Major infestation areas may be treated with multiple methods, such as the recommended herbicides (if approved by the landowner) and/or by mechanical methods such as mowing or burning. The contractor will be required to obtain the necessary permits and/or certifications for the use of applicable herbicides.

At this time, no prairies or MnDNR lands are expected to be crossed. In the event any prairie crossings are identified, ITC Midwest will work with the MnDNR to ensure that any mitigation or minimization measures are developed before construction in that area.

## 7.0 REVEGETATION AND RESTORATION

Once construction ceases, the ROW will be inspected to identify areas impacted by Project activities. Typical impacts might include rutting, soil compaction, soil exposure, and damage to native vegetation, all to varying degrees. Areas of minimal disturbance will be allowed to regenerate naturally with landowner approval. Such areas may include those where erosion is limited to dispersed areas and surrounding existing vegetation provides control of sediments; existing vegetation is matted down due to vehicle traffic; or areas where drilling spoils are raked into existing vegetation. These areas will be identified at the time of restoration.

All conditions as specified in local, state, and federal permits and private landowner agreements for final restoration and cleanup will be met. Revegetation and restoration of disturbed areas associated with Project activities (which will be detailed in the Project SWPPP) are intended to protect wetland and water resources from issues associated with sedimentation, to protect wildlife habitat, and reduce the movement of NWIS species within the ROW.

Restoration activities may, as needed, include:

- Collection and disposal of all work-related debris and trash.
- Discing or grading to repair rutting.
- Regrading areas disturbed by construction or clearing to reflect pre-construction topography.
- Applying temporary cover and/or temporary seed to minimize erosion potential to the extent practicable.

- Permanent seeding of non-agricultural areas disturbed by transmission line structures or other facilities to prevent runoff.
- Unless timber, slash or chips have been requested by the landowner, all residual vegetation materials will be removed and properly disposed of off-site.
- Trees (>4 inches diameter at breast height (dbh) or >20 feet tall) cut from a wetland will be moved outside of the wetland. If the materials will be chipped or shredded, that work will be completed outside of wetlands.
- Brush within a wetland may be cut with a brush mower or similar device as long as material from outside the wetland is not brought into the wetland. If sufficient brush is present such that debris will exceed 4 inches, sufficient brush will be hauled out for processing in an upland area.
- Wood chips will not be placed in wetlands, and wood chips placed in uplands will not exceed 1 inch in depth.
- Within wetlands, all construction matting will be removed and vegetation will be allowed to regenerate naturally.

## 7.1 TEMPORARY REVEGETATION AND RESTORATION

Temporary revegetation will be implemented to quickly establish vegetative cover with the primary purposes of minimizing soil erosion and reducing the potential for the establishment of noxious weeds. The temporary seed mix is considered a cover crop, is made up of annual grasses, has rapid germination, and provides a quick ground cover. This seed mix is not intended to provide multi-year cover. Unless specifically requested by landowners or land management agencies, ITC Midwest does not plan to establish temporary vegetation on cultivated land or in areas of open water.

Temporary seeding of cover crop will occur in locations where unfrozen, bare soil surface conditions and ruts will not be permanently restored within 14 days of completion of active work (seven days for an area draining to a discharge point on the Project that is within one mile of a special or impaired water and flows to that special or impaired water). Temporary restoration activities will include the repair of rutted surfaces and an even broadcast-seeding of the temporary cover-crop seed mix at a rate of 80 lbs./acre. No mulch is to be applied in wetland areas.

Temporary vegetation must be placed in accordance with the SWPPP or in consultation with ITC Midwest. Temporary vegetation establishment may be expected to be successful between April 1 and September 30. Establishment of temporary vegetation is unlikely to be successful outside of this time window. Temporary use of mulch to stabilize soils should be applied outside of the April 1 through September 30 window.

Straw or wood chip mulch (less than or equal to 1 inch depth) may be used to help stabilize areas or bare soils in uplands only during the establishment of temporary vegetation or during the period between October 1 and April 1 (winter). The contractor will apply mulch during the establishment of temporary vegetation as requested by the landowner, specified in licenses or permits, or as requested by ITC Midwest.

Mulch, free of soil material and derived from onsite sources, may be used to protect areas where bare soils have been exposed due to tree clearing and construction activities. In winter situations, wood chips or other appropriate BMPs such as erosion control blankets may be used to provide protection for bare soils exposed due to construction activities where out-of-season seeding is not applicable.

Mulch derived from onsite locations may be spread up to 1 inch deep in upland areas to provide ground protection along access paths. Upon abandonment of access routes, mulch is to be spread evenly to a depth no greater than one inch. Mulch is not to be used within wetlands. Straw mulch used on the Project sites will consist of state certified weed-free material. Straw mulch may be used outside of the seeding window as a temporary erosion control measure, followed by temporary or permanent seeding at the earliest possible time after the April 1 seeding date. The contractor will be responsible for locating and documenting the source of certified weed-free mulch. Copies of the applicable documentation must be made available upon request to the applicable agencies. Straw mulch will be applied as previously described.

## 7.2 PERMANENT REVEGETATION AND RESTORATION

Appropriate vegetative cover of the ROW will be required along the entire length of the ROW. Since this project does not require major grading activities, 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 ROW, active restoration may not be required. Monthly monitoring during the first year, and adaptive management will be required to ensure that NWIS are controlled, that desirable native plant species become the dominant vegetation communities in natural areas, and that bare soils are quickly stabilized to reduce erosion. 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, using the temporary cover-crop seed mix may be sufficient for cover while native species revegetate the area. ITC Midwest may consult with the appropriate agencies during the construction period to assess application of techniques in specific locations. Permanent seed mixes will include native seed varieties commonly found and/or available from local seed distributors. The permanent seed mixes are designed to augment the natural colonization of the ROW by local, native seed sources.

On private agricultural lands, ITC Midwest's land agents will work with landowners to develop appropriate measures for reseeding of disturbed lands. Unless requested by the landowner, a native area vegetation seed mix will be used.

## 8.0 SEEDING METHODS AND TIMING

Revegetation and restoration of disturbed areas associated with construction activities are intended to protect wetland and water resources from issues associated with sedimentation, to protect wildlife habitat, and reduce the movement of NWIS species within the ROW. Oversight for the implementation of revegetation and restoration procedures will be provided by ITC Midwest in the Project SWPPP.

Seed used will be purchased on a Pure Live Seed (PLS) basis for seeding revegetation areas. Seed tags will identify:

- Purity;
- Germination;
- Date tested;
- Total weight and PLS weight;
- Weed seed content; and
- Seed supplier's name and business information.

Seed will be used within 12 months of testing as required by applicable state rules and regulations. The seed tags on the seed sacks will also certify that the seed is "noxious weed free." Seed rates used on the project will be based on PLS rate, not actual weight. The species components of individual mixes are subject to availability at the time of purchase. Grass species may be substituted with alternative native or non-invasive species that are included in Natural Resource Conservation Service guidelines and subject to approval by ITC Midwest.

Seed tags must be collected by the contractor and provided to ITC Midwest during seeding activities. The tags will be reviewed by ITC Midwest or its agent prior to use to ensure that the seed mix complies with specifications described herein. Legume seed (where specified) will be treated with inoculants specific to the species and in accordance with the manufacture's recommended rate, appropriate for the seeding method (broadcast, drill, or hydroseeding).

Seedbed preparation and seeding are to occur immediately following completion of construction activities and site cleanup in any given location. Where applicable, soil will be tilled to a minimum depth of four inches with a disc, field cultivator, or chisel plow to prepare the seedbed, breaking up large clumps and firming the soil surface. Prior to seeding, prepared beds should be sufficiently soft to allow for seed penetration and mulch anchoring, while sufficiently firm to provide surface soil stability. Seeding and mulching should occur parallel to ground contours as practicable.

In order to minimize ground disturbance along the entire ROW, forested areas will be cleared, but roots and stumps will be left in place where feasible and practicable. 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 smoothing ruts, preparing seedbeds with small rakes, and surface packing after seeding. The contractor will work with ITC Midwest to develop strategies to work around stumps. Fertilizers and other soil amendments are not recommended and will only be applied as requested by and agreed to with landowners.

## 8.1 SEEDING METHODS

Drilled seed will be sown at an appropriate depth based on the type of seed. 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. Within cleared areas, it is assumed that seed drilling will be limited by the presence of stumps and roots left in place to retain the soil surface.

Broadcast seeding will occur as specified in the seed mixes. Seed is to be uniformly distributed 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 will occur as specified in the seed mixes. 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. ITC Midwest will only use hydromulch products approved by MnDOT (https://stormwater.pca.state.mn.us/index.php/MnDOT_approved_-_qualified_hydraulic_mulch_products).

## 8.2 SEED MIXES

ITC Midwest will strive to use seed mixes which are native to Minnesota. Seed mixes are based on regionally appropriate state seed mixes that are recommended by the Minnesota Board of Soil and Water Resources (BWSR) and the Minnesota Department of Transportation (MnDOT). The mixes in Table 1 are reflective of the Project location, with road ROWs for the entirety of the route. ITC Midwest will work with landowners to identify the preferred seed mixes to be used on exposed soils on their property.

**Table 1. Proposed Project Seed Mixes**

| Seeding Area | Seed Mix Name (State Seed Code) | Purpose | Rate (Pure Live Seed ["PLS"]) |
|---|---|---|---|
| General | Cover Crop: Winter Wheat (WW) or Oats (O) | Short term stabilization for spring and summer (O) and fall (WW) | 100 lbs/ac. |
| Small areas (less than one acre) | Patch Mix (PM) | Reseeding small areas (<1acre) due to disturbance, maintenance, utility work, etc. Also for 2-5 year soil stabilization. | 30 lbs/ac. |
| Private turf | Residential Turfgrass (RT) | Boulevards and other urban roadsides where low-maintenance and salt-tolerant turfgrass is needed. | 200 lbs/ac. |
| Mesic General Roadside | Mesic Inslope (MI) | Inslopes within 15 feet of shoulder and medians ≤55 feet wide; roads with <30,000 cars per day | 65 lbs/ac. |
| Sandy General Roadside | Sandy Inslope (SI) | Inslopes within 15 feet of shoulder and medians ≤55 feet wide; areas with sandy soils. | 65 lbs/ac. |
| Wet Roadside Ditches | Wet Ditch (WD) | Wet ditches and some stormwater plantings; sites with wet soils mowed once per year or less. Meets pollinator habitat requirements. | 20 lbs/ac. |
| Upland Roadside Native Vegetation | Southern Shortgrass Roadside (SSR) | Inslopes and medians when native vegetation is required; sites with dry soils mowed twice per year or less. Meets pollinator habitat requirements. | 26 lbs/ac. |
| Mesic Roadside Native Vegetation | Southern Tallgrass Roadside (STR) | Backslopes and dry ditch bottoms; sites with moderate moisture mowed once per year or less. Meets pollinator habitat requirements. | 26 lbs/ac.* |

## 8.3 EROSION CONTROL

State certified weed-free straw mulch will be applied to disturbed, non-cultivated upland areas if requested by landowners or land managers. The contractor will be responsible for acquiring certified weed-free straw mulch from approved sources and copies of applicable documentation

must be provided to ITC Midwest. Mulch will be required on disturbed, exposed soils on all slopes greater than five percent, and on dry, sandy soils prone to erosion by wind or rain.

Straw mulch will be applied at a rate of two tons per acre in upland areas unless otherwise specified in permit conditions. Mulch will be uniformly distributed by mechanical blower or by hand in areas where vehicular access is limited. Mulch stalks are to be a minimum of eight inches long in order to facilitate adequate anchoring. Mulch will be crimped to a depth of two to three inches using a mulch anchoring device where accessible. In areas where stumps and slash limit access by vehicles, mulch may be applied by hand at the specified rate and anchored in place by a liquid tackifier approved by ITC Midwest.

### 8.4 TIMING

Seeding periods for application of the native area vegetation seed mix and the wet meadow seed mix are limited to April 1 to June 30, during spring, or when soil temperatures have fallen below 55 degrees Fahrenheit in the fall. Outside of these time windows, temporary seed mixes, applied according to temporary cover-crop seed mix specifications are to be used. Prior to installation of native seed mixes, the seedbed should be mowed and prepared for final seeding.

Seeding of the ROW is to occur within seven days of final cleanup/grading activities during the growing season (April-September). Where seeding is not possible within 48 hours, temporary stabilization using erosion control matting or mulch is required. Dormant seeding may be used after soil temperatures have fallen below 55 degrees Fahrenheit. Lower temperatures prevent seed from germinating. Dormant seeding will only be allowed using seed drills and is not permitted when soil is frozen or when snow is present. If dormant seeding is performed, temporary erosion control measures will be installed within seven days of seeding. Erosion control measures will consist of anchored straw mulch at a rate of two tons per acre, anchored hydromulch at a rate of two tons per acre, or erosion control blankets.

## 9.0 MONITORING

ITC Midwest will monitor and control NWIS within the ROW through the construction of the Project, per the requirements of the SWPPP. During Project construction, ITC Midwest will inspect and provide information regarding infestations of NWIS along the ROW to the appropriate agencies. ITC Midwest will meet easement and lease conditions and obligations and will continue to work with landowners and the appropriate agencies to achieve standards set forth in easement or lease agreements during construction and subsequent maintenance activities.

As part of the construction of the Project and the related restoration and revegetation activities, ITC Midwest 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 native plant communities.

## 10.0 OPERATIONS AND MAINTENANCE

### 10.1 ROUTINE INSPECTIONS

In addition to SWPPP inspections during and after active construction, ITC Midwest will also conduct aerial and/or ground visual inspections of the ROW to ensure a safe and reliable corridor and to ensure access for maintenance activities or emergencies. Maintenance work will be based on the findings of those inspections.

## 10.2 ROUTINE MAINTENANCE

ITC Midwest will periodically clear vegetation from the existing ROW to maintain a safe and apparent corridor, and to allow access for maintenance activities or emergencies. Clearing typically includes brushing equipment traveling down the ROW, 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 ROW.

Project-specific maintenance techniques and mitigation measures include:

- If the surface is unstable such that rutting, soil compaction, or soil mixing may occur, low ground-pressure equipment will be used or maintenance equipment will be operated from weed-free mats or temporary timber corduroy that will be removed upon completion of the work.
- Vegetation management requirements stipulated in any MnDNR, MnDOT, or local governmental unit licenses or permits will be followed.
- All extra work areas (such as staging areas and additional spoil storage areas) will be located outside of wetland boundaries, where topographic conditions permit. If topographic conditions do not permit, an alternate location or matting will be used to minimize impacts.

Due to the typically unstable nature of soils in wetlands, and to preserve wetland hydrology and function, special practices are necessary for some operation and maintenance activities as follows:

- If the surface is unstable such that rutting, soil compaction, or soil mixing may occur, low ground-pressure equipment will be used or maintenance equipment will be operated from weed-free mats or temporary timber corduroy that will be removed upon completion of the work.
- Wetlands generally revegetate naturally. If no standing water is present, temporary cover crop as specified may be planted at a rate of 80 pounds per acre. No fertilizer or lime will be applied in wetlands.

## 10.3 EMERGENCIES

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