



March 4, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: EERA Comments and Recommendations
Scoping Process Summary
MP Duluth Loop Reliability Project
Docket Nos. Docket No. E015/CN-21-140, and E015/TL-21-141

Dear Mr. Seuffert,

Attached are comments and recommendations of Department of Commerce, Energy Environmental Review and Analysis (EERA) staff in the following matters:

In the Matter of Minnesota Power for a Certificate of Need and a HVTL Route Permit for the Duluth Loop Reliability Project in St. Louis County

EERA staff is providing the Commission with a summary of the scoping process for the environmental assessment (EA) that will be prepared for Duluth Loop Reliability Project. Staff is available to answer any questions the Commission may have.

Sincerely,

William Cole Storm
Environmental Review Manager

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Energy Environmental Review and Analysis
Comments and Recommendations

In the Matter of the Minnesota Power for a HVTL Route Permit for the Duluth Loop Reliability
Project in St. Louis County
Docket No. E015/CN-21-140 and E015/TL-21-141

Date: March 4, 2022

Staff: William Cole Storm | bill.storm@state.mn.us | 651-539-1844

Issues Addressed: Summary of the scoping process for the Environmental Assessment (EA).

Tables, Figures, Attachments:

Table 1: Scoping Commenters

Table 2: Summary of Comments

Figure 1: Project Overview Map

Figure 2: Aerial Map Depicting Mogie Lake, Neitzel Residence, Proposed Line 71/176

Attachment 1: Neitzel Alternative Route Segment

Attachment 2: Minnesota Power Response to Comments

Additional documents and information can be found on eDockets
<https://www.edockets.state.mn.us/EFiling/search.jsp> (year="21" and either number "140" or "141")

This document can be made available in alternative formats, i.e., large print or audio tape by calling 651-539-1530.

Introduction and Background

On October 21, 2021, Minnesota Power (Applicant) submitted a Certificate of Need (CN) Application and a high voltage transmission line (HVTL) Route Permit Application (RPA) to the Minnesota Public Utilities Commission (Commission).¹ The RPA was submitted under the alternative review process (Minnesota Statute 216E.04; Minnesota Rule 7850.2800-3900).

¹ Minnesota Power Duluth Loop Combined Application, p. 1-1. October 21, 2021. eDocket No. 202110-179004.

Project Purpose and Description

The stated purpose for the Duluth Loop Project is to replace the system support once provided by coal-fired baseload generators located along Minnesota’s North Shore by addressing severe voltage stability concerns, relieving transmission line overloads, and enhancing the reliability of Duluth-area transmission sources.²

The RPA continues, noting that the transmission system in the Duluth area has historically been supported by several coal-fired baseload generators located along Minnesota’s North Shore, which have for decades contributed to the reliability of the transmission system by delivering power to the local area and providing system support. The applicant indicates that the transition away from reliance on coal to increasingly lower carbon sources of energy, has led to an increased reliance on the transmission system to deliver replacement power and system support to the Duluth area and along the North Shore.³

Minnesota Power believes in order to maintain a continuous supply of safe and reliable electricity while replacing the support once provided by these local coal-fired generators, the Duluth area transmission system must be upgraded. To accomplish this, Minnesota Power is proposing that the transmission system in the area be reconstructed, reconfigured, and improved to enhance system stability and reliability.⁴

The Duluth Loop Project includes: (1) construction of about 14 miles of new 115 kV transmission line between the Ridgeview, Haines Road, and Hilltop Substations; (2) construction of a new approximately one-mile extension connecting an existing 230 kV transmission line to the Arrowhead Substation; (3) upgrades to the Ridgeview, Hilltop, Haines Road, and Arrowhead substations; and (4) reconfiguration, rebuild, and upgrade to existing transmission lines and communications infrastructure in the Project area (**Figure 1**).⁵

Regulatory Process and Procedures (Certificate of Need)

A CN is required for all “large energy facilities,”⁶ unless the facility falls within a statutory exemption from the CN requirements. Through the CN proceedings the applicant must demonstrate using a number of factors prescribed in the rules that the proposed facility is in the best interest of the state’s citizens. The applicant must also demonstrate there is not a more prudent and reasonable way than the proposed project to provide the stated goals.

The Duluth Loop Project’s transmission lines each meet the definition of a large energy facility and are without an exemption, thus, the granting of a CN is required prior to issuance of a HVTL Route Permit.

² Minnesota Power Duluth Loop Combined Application, p. 1-1. October 21, 2021. eDocket No. 202110-179004.

³ Ibid.

⁴ Ibid.

⁵ Minnesota Power Duluth Loop Combined Application, p. 2-1. October 21, 2021. eDocket No. 202110-179004.

⁶ Minn. Stat. 216B.243, subd. 2; Minn. Stat. 216B.2421, subd. 2(1 and 2).

A portion of the combined application filed by Minnesota Power on October 21, 2021, is intended to satisfy the informational requirements contained in Minnesota Rule 7849.0220 in the consideration of a CN for the Duluth Loop Reliability Project.⁷

Application and Acceptance

The Commission must determine if an application for a CN is complete; the Commission must notify the applicant within 30 days of the receipt of an application if the application is not substantially complete. On notification, the applicant may correct any deficiency and may resubmit the application. If the revised application is substantially complete, the date of its submission is considered the application date.⁸ In addition to deciding if the application is complete, the Commission will typically determine the type of hearing (contested case or informal) to be used. Once the application is determined to be complete, the Minnesota Department of Commerce (Department) will initiate the environmental review process.

Environmental Review

CN applications are subject to environmental review; in such a proceeding EERA staff must prepare an environmental report (ER) for the project.⁹ The report contains “*information on the human and environmental impacts of the [project] associated with the size, type, and timing of the project, system configurations, and voltage.*”¹⁰ The ER also contains information on alternatives to the project, as well as mitigation measures.

If an applicant for a CN applies for a HVTL route permit concurrently, or prior to scoping, EERA may elect to prepare an Environmental Assessment (EA) in lieu of an environmental report. If so, the EA must include the content required by Minnesota Rule 7849.1500.

Public Hearing

If it is determined that a contested case is not warranted, then the Commission will initiate an informal process. This informal process will include at least one public hearing that may be overseen by an Administrative Law Judge (ALJ) from the Office of Administrative Hearings (OAH). At the conclusion of this informal process the ALJ will produce a report.

A contested case hearing is warranted if there are disputed issues of material fact; in such a case, the Commission must request an ALJ from the OAH. The duties of the ALJ during these proceedings are described in Minnesota Rule 1400.5500. Once the OAH assigns an ALJ for a contested case hearing the parties will first meet at a pre-hearing conference. At this prehearing conference, the parties will discuss procedural issues including an intervention deadline for requesting formal party status, discovery, locations of public and evidentiary hearings and a schedule for a hearing.

⁷ Minnesota Power Duluth Loop Combined Application, Appendix A. October 21, 2021. eDocket No. 202110-179004.

⁸ Minn. R. 7849.0200, subp. 5.

⁹ Minn. R. 7849.1200.

¹⁰ Ibid.

At the conclusion of the evidentiary hearing, public hearing, and comment period the ALJ produces a report.

If the HVTL route permitting process and CN determination are proceeding concurrently, the Commission may order that a joint hearing be held to consider both routing and need.¹¹

Final Decision

The Commission has 12 months to approve or deny a certificate of need from the date the application is filed.¹²

On December 14, 2021, the Commission issued an Order on the application of Minnesota Power for a CN for the Duluth Loop Reliability Project; the Commission determined that 1) the Applicants' petition was substantially complete and 2) the Commission will evaluate the petition using the Commission's comment process.

Regulatory Process and Procedures (HVTL Route Permit)

The Duluth Loop Reliability Project requires a HVTL route permit from the Commission;¹³ the Project qualifies for review under the alternative permitting process authorized by Minnesota Statutes § 216E.04, subd. 2(3) and Minnesota Rules 7850.2800, Subp. 1(C) because the 115 kV portion of the Project is a high voltage transmission line between 100 and 200 kV and the 230 kV portion of the Project is less than five miles in length.

Applicants must provide the commission with written notice of their intent to file an application under the alternative permitting process,¹⁴ which was provided on March 22, 2021.¹⁵

Application and Acceptance

Route permit applications must provide specific information.¹⁶ This includes, but is not limited to, information about the applicant, descriptions of the project and site, and discussion of potential human and environmental impacts and possible mitigation measures.¹⁷ Under the alternative permitting process an applicant is not required to propose alternative sites or routes; however, if alternatives were evaluated and rejected, the application must describe these and the reasons for rejecting them.¹⁸

¹¹ Minn. Stat. 216B.243, subd. 4 (stating that unless a joint hearing is not feasible or more efficient, or otherwise not in the public interest, a joint hearing shall be held).

¹² Minn. Stat. 216B.243, subd. 5; Application at page 4 (the applicant anticipates the site permit decision to be made in summer 2020).

¹³ Minn. Stat. 216E.03, subd. 1 and 2.

¹⁴ Minn. R. 7850.2800, subp. 2.

¹⁵ Minnesota Power, Notice of Intent to File Site and Route Permits Under the Alternative Process, August 18, 2021. eDocket No. 20218-177245-01.

¹⁶ Minn. Stat. 216E.04, subd. 3; Minn. R. 7850.3100.

¹⁷ *Ibid.*

¹⁸ *Ibid.*

Upon receiving a HVTL route permit application, the Commission may accept it as complete, reject it and advise the applicant of its deficiencies, or accept it as complete but require the applicant submit additional information.¹⁹

Once the Commission determines an application is complete, the formal environmental review process can begin.

Public Advisor

Upon acceptance of a RPA the Commission must designate a public advisor.²⁰ The public advisor answers questions about the permitting process but cannot provide legal advice or act as an advocate for any person.

Advisory Task Force

The Commission may appoint an advisory task force to aid in the environmental review process.²¹ An advisory task force would assist EERA staff in identifying additional routes or particular impacts to evaluate in the EA prepared for the project.²² If appointed, an advisory task force must include certain local government representatives.²³ The advisory task force expires upon completion of its charge or issuance of the scoping decision.²⁴

Appointment of an advisory task force is not required at the time of *Application Acceptance*; in the event no advisory task force is appointed citizens may request one be created.²⁵ If such a request is made, the commission must make this determination at its next scheduled agenda meeting.²⁶

The decision whether to appoint an advisory task force, does not need to be made at this time; however, a decision should be made as soon as practicable to ensure an advisory task force could complete its charge prior to issuance of the scoping decision.

Environmental Review

Route permit applications are also subject to environmental review. The alternative permitting process requires completion of an EA, which is prepared by EERA staff.²⁷ An EA contains an overview of the resources affected by the project and discusses potential human and environmental impacts and mitigation measures.²⁸ Under the alternative permitting process an EA is the only required state environmental review document.²⁹

¹⁹ Minn. R. 7850.3200.

²⁰ Minn. R. 7850.3400.

²¹ Minn. Stat. 216E.08, subd. 1; Minn. R. 7850.3600, subp. 1.

²² Minn. R. 7850.2400, subp. 3.

²³ Minn. Stat. 216E.08, subd. 1.

²⁴ Minn. R. 7850.2400, subp. 4.

²⁵ Minn. R. 7850.2400, at subp. 2.

²⁶ *Ibid.*

²⁷ Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 1.

²⁸ Minn. Stat. 216E.04, subd. 5; Minn. R. 7850.3700, subp. 4.

²⁹ Minn. Stat. 216E.04, subd. 5.

EERA conducts necessary public scoping meetings in conjunction with a public comment period to inform the content of the EA (i.e., Scoping).³⁰ The commissioner of the Department or a designee determines the scope of the EA,³¹ and may include alternative routes suggested during the scoping process if they would aid the Commission in making a permit decision.³²

Public Hearing

The alternative permitting process requires a public hearing be held in the project area upon completion of the EA³³ in accordance with the procedures outlined in Minnesota Rule 7850.3800, subpart 3.

The hearing is typically presided over by an ALJ from the OAH. The Commission may request that the ALJ provide solely a summary of public testimony. Alternately, the Commission may request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project. (This hearing is not a contested case hearing and is not conducted under OAH Rule 1405).

Final Decision

The Commission is required to make a HVTL route permit decision within six months from the date an application is accepted.³⁴ This time limit may be extended up to three months for just cause or upon agreement of the applicant.³⁵

On December 14, 2021, the Commission issued an Order on the application of Minnesota Power for a HVTL Route Permit for the Duluth Loop Reliability Project; the following disposition made: 1) Accepted the HVTL Route Permit Application for the Duluth Loop Reliability Project as substantially complete, 2) take no action on an advisory task force, and 3) request a full ALJ report with recommendations for the project's public hearing.

Scoping Summary

On January 10, 2022, Commission and EERA staff sent notice of the place, date and time of the Public Information and Scoping meetings to local government units and those persons on the Project contact/general list.³⁶

Commission staff and EERA staff jointly held a Public Information and EA Scoping meeting at the AAD Shrine Meeting and Event Center in Hermantown on January 26, 2022. A remote-access meeting (Webex) was held on January 27, 2022. The purpose of the meetings was to provide information to the public about the proposed Project, to answer questions, and to allow the public an opportunity to suggest

³⁰ Minn. R. 7850.3700, subp. 2.

³¹ Id. at subp. 3.

³² Id. at subp. 2.

³³ Minn. R. 7850.3800, subp. 1.

³⁴ Minn. R. 7850.3900, subp. 1.

³⁵ Ibid.

³⁶ Notice of Public Information/Scoping Meeting, January 10, 2022, eDocket no. [20221-181338-01](#).

alternatives and impacts (i.e., scope) that should be considered during preparation of the environmental review document. A court reporter was present at the meetings to document oral statements.

EERA also used the services of MetroQuest³⁷ on-line survey to gather comments on the proposed RPA.

Scoping Comments

Thirteen people attended the in-person public information and scoping meeting, while three people attended the remote meeting; during the comment period, which closed on February 4, 2022. Four public comments were received, and one comment letter was received from state agencies.³⁸

Comments received ranged from statements of support for, or opposition to, a proposed HVTL project, to specific concerns or perceived impacts. In preparing the Scoping Decision recommendation, EERA staff considered all comments to the extent practicable. An identification number was assigned to each originator of a comment, including those expressed orally at the public meeting (**Table 1**). For individuals who submitted comments containing multiple points, sequential numbers were assigned to each commenter's distinct point; for example, Comment 9-4 refers to the 4th comment by the commenter assigned as number 9.

After reviewing and analyzing the comments received, a summary table of issues was developed for each commenter.

The court reporter record from the public meetings, as well as scanned images (pdf) of the original written comments received, were posted on the EERA webpage and efiled in the dockets. The individuals' comments are summarized in **Table 2**.

Table 1: Scoping Commenters

Commenter Number	Commenter Name	Commenter Agency or Organization
Oral Commenter – Public Meetings		
1	Lisa Neitzel	Private Citizen
2	Grant Forsyth	Zoning Administrator, Town of Midway
3	Michael Koppy	Private Citizen – Hermantown Volunteer Coordinator Trails
4	Kevin Sleen	Private Citizen
5	Jeff Richtman	Private Citizen
6	Sarah Yokel	Private Citizen
7	Dan Belden	Western Lakes Superior Sanitary District
8	John Bodell	Private Citizen
9	Fred Schmitz	Private Citizen
10	Allen Widell	Private Citizen

³⁷ [Home | MetroQuest](#).

³⁸ Public Scoping Comments through February 4, 2022, Close of Comment Period (Oral and Written Comments), eDocket No. [2022-182651-02](#).

Written Commenter		
11	Cindy Lee	Private Citizen
(1)	Lisa Neitzel	Private Citizen
12	Dwight Morrison	Private Citizen - Co-chair of Citizens Committee for Environmental Concerns
13	Kris Liljeblad	Private Citizen - Northridge Estates Association
14	Stacy Kotch Egstad	Minnesota Department of Transportation
15	MetroQuest Survey	MN Dept of Commerce - MetroQuest Studio

Table 2: Summary of Comments

Comment Number	Summary of Issues
1-1	Ms. Neitzel expressed concern on the impacts of the proposed project, along Line 71 south of Mogie Lake, on the many varieties of wildlife that live on or near their 38-acre parcel adjacent to Mogie Lake. Additional concerns included potential effect EMF may have on their daughter, who she states is extremely sensitive to overhead power lines; Ms. Neitzel has requested that an alternative route segment (see discussion below) be considered for inclusion in the scope of the EA in an effort to mitigate these concerns.
2-1	Mr. Forsyth is concerned about a section of the existing Line 98 (proposed thermal upgrade) where it parallels St. Louis River Road that may have on nearby Kingsbury Creek (sedimentation, vegetation clearing, use of herbicides). Mr. Forsyth notes that Kingsbury Creek is an impaired trout stream and given the “soft” soils he requests that any new structures be placed at least 300 feet from the ordinary high-water mark.
3-1	Mr. Kopyy is concerned how the proposed project may impact the use and enjoyment of the Rocky Run Trail (west of Lavaque Road) as the realignment shifts the line slightly to the north.
4-1	Mr. Sleen lives along Hermantown Road (Section 21, T150N, R15W) west of where the current HVTL (Line 57, circa 1950s) parallels the Midway River (a designated trout stream); he is concerned about what the impact of the proposal to shift this existing line (along with the new Line 176) away from the river onto his property will have on property values and ability to development.
5-1	Mr. Richtman asked whether the means of vegetation control (mechanical or herbicides) the utility uses on easement through private property is covered in the EA and can it be dictated in the HVTL Route Permit. Mr. Richtman also asked for clarification of ROW widths between double-circuit and paralleling.
6-1	Ms. Yokel asked if the existing easement will be released back to the landowner on those parcels where the lines are being removed and relocated.
7-1	Mr. Belden was concerned and sought clarification on the placement of structures relative to the sanitary district’s large wastewater interceptor (Highway 53 and Haines Road) crosses the proposed route.

8-1	Mr. Bodell was seeking clarification on whether the proposed lines on his property were to be parallel or double circuit.
9-1	Mr. Schmitz was seeking clarification on whether the Duluth Bible Church property was along any of the proposed project routes.
10-1	Mr. Widell asked about clarification on the type (H-frame or mono-pole) structures were planned along a specific section of the project.
11-1	Ms. Lee owns 10 acres at the end of W. Morgan St. in Duluth which currently has a power line that cuts through the corner of her property; she has two questions; 1) How much wider would the new ROW be, and are landowners being compensated for use of additional land?
12-1	Mr. Morrison expressed opposition to the proposed project based on the three points: The most important environmental concern with MP&L power generation, is to reduce the reliance on carbon-based fuel. This 'carbon reduction' will have a positive impact on the environment in the long term. This project is not a way to reduce carbon-based power generation because it ultimately utilizes purchase of power from the existing grid that is produced by carbon-based fuels. The way to reduce the dependence on power from coal burning plants is to substitute clean energy in the form of 'wind' and 'solar'. The MP&L project will purchase power from the existing 'carbon generated' power grid that is not an environmentally sound process! This project misses the real opportunity to substitute clean 'wind' and 'solar' power generation for 'coal' based generation.
12-2	Any new energy production and use needs to utilize non-carbon-based generation to be environmentally sound. This 'reliability' project is pictured a eliminating dependence on carbon based generation because of the closing of three (3) Coal Fired Plants by MP&L. But it does not because it substitutes new power through the new transmission lines that is purchased from existing 'carbon' based generation plants. This 'Reliability Project' is a great opportunity to replace 'coal' based generation with 'wind' and 'solar' production. Instead, it simplistically uses the existing 'carbon based' grid through new high-power lines.
12-3	This project to construct new high power connection lines, misses the opportunity to develop environmentally sound 'carbon free' power generation to replace existing 'coal' fired plants. We now have a chance for a comparative estimate of the cost for a 'reliability' alternative via purchase of new power, compared to the development of 'wind' and 'solar' alternatives. Replacing the 'coal' generation with environmentally sound 'wind' and/or 'solar' alternatives will result in carbon free power generation. In place of buying power from the 'carbon' based grid, now we have the real opportunity to support true 'carbon free' power generation. This new power generating alternative can also be a paying process by selling the new 'solar' and/or 'wind' power to the grid when it is not needed locally.
13-1	Mr. Liljeblad, commenting on behalf of the Northridge Estates Association, stated that they are an affected property owner within the shared segment of Line 56 and Line 19 west of the Ridgeview Substation, between Howard Gnesen and Rice Lake Roads, which is the proposed route of a new 115 kV transmission line. Mr. Liljeblad summarized their concerns as:

	1) Our NEA acreage is dedicated in perpetuity to the Minnesota Land Trust which strictly restricts possible uses and must be considered in your EA and your location decision-making.
13-2	2) To minimize impacts, maximum effort should be made to restrict the footprint of the new 115 kV line to the right of way containing the existing Line 56 and Line 19.
13-3	3) The East Branch of Chester Creek, a designated trout stream, crosses the existing power line adjacent to NEA's property. Potential impacts and mitigations should be carefully considered to preserve and enhance this treasured resource.
13-4	4) Management of vegetation under these power lines in the future should include greater efforts to eradicate invasive species, especially buckthorn, and to benefit wildlife.
14-1	<p>Ms. Egstad, from MnDOT noted that its fundamental interest is to ensure that the EA identifies and quantifies, to the extent possible, any impacts the proposed high voltage transmission line may have on the safety of the transportation system, the effectiveness of the operations or maintenance of the state trunk highway system and any additional costs that may be imposed on the state trunk highway fund as a result of the location of the proposed HVTL. MnDOT stated that the Applicant has proactively consulted with them during the planning phase of this route; Appendix M in the Application correctly reflect discussion topics, areas of concern, and key factors associated with the proposed HVTL crossing of Minnesota Trunk Highway 53. MnDOT continues, that the Applicant has a thorough understanding of the challenges presented in crossing TH 53 in this area.</p> <p>Additionally, Ms. Egstad added, since these discussions new challenges to the placement of this line have been revealed with the Miller Creek Meandering Project; while the HVTL crossing in this area is still feasible from MnDOT's perspective, further discussions with the Applicant are required on the following:</p> <ul style="list-style-type: none"> • Pole placement – the specifics of where the northeast pole, relative to TH 53, can safely be constructed will need to be agreed upon between the DNR, the Applicant, and MnDOT. • Construction/Permanent Access – the safest point of access for the same northeast pole is still undetermined as the surrounding area presents several access challenges. Because MnDOT will allow temporary access for construction but not permanent, the Applicant may need to acquire other landowner approvals for both temporary and permanent access to this part of the project area.
15-1	I am interested in how this might affect the trail systems in Hermantown, specifically behind Fichtner Field.
15-2	Will this affect the public trails (Hermantown Missing Link Trail)?

Proposed Alternatives

The process for individuals to request that specific alternative routes, alternative route segments, and/or alignment modifications be included in the scope of the environmental review document was discussed at the EA scoping meeting.

As covered during the EA scoping meeting, to be considered for inclusion in EERA's *Scoping Decision* recommendation to the Department Commissioner, alternative routes, route segments, or modifications to the alignment must meet an initial screening to be considered. This initial screening requires that all requests must:

1. Be submitted during the scoping comment period.
2. Describe the specific impact being mitigated.
3. Be specific and identifiable.
4. Meet the stated need for the project.

One alternative route segment (Neitzel Alternative Route Segment) was submitted for consideration (**Attachment 1**) by Lisa Neitzel during the EA scoping comment period. Ms. Neitzel expressed concerns that the proposed line would have on her daughter's health (EMF) and on the abundant wildlife in the area.

The Neitzel residence is located on the south side of Mogie Lake and is approximately 500 feet north of the current Line 71 conductor (**Figure 1 and Figure 2**); the proposed new line (Line 176) would be double circuited with the existing 71 Line on new structures within the existing 71 Line ROW.

The Neitzel Alternative Route Segment would move the existing Line 71 and the new proposed Line 176 south approximately 700 feet to run parallel along the north side of the existing Line 98 (**Attachment 1**).

Applicant Comments

Pursuant to Minn. Rule 7850.3700, subpart 2(B), applicants have the right to review proposed alternatives and submit reply comments.

On February 23, 2022, Minnesota Power filed a reply to comments (**Attachment 2**), questions, and the request for the EA to include the Neitzel Alternative Route Segment that were submitted during the scoping comment period.³⁹

Minnesota Power stated in their response comment that they had previously evaluated the Neitzel Alternative Route Segment during the route development process prior to filing its CN and RPA; that this route alternative was rejected due to the need for additional right-of-way and greater impacts to homes and buildings as compared to the Proposed 115 kV Route.

However, Minnesota Power did take a second look to reanalyze the Neitzel Alternative Route Segment and compare it to the corresponding portion of the Proposed 115 kV Route. The analysis found that there are four homes within the right-of-way of the Neitzel Alternative Route Segment that could potentially be

³⁹ Minnesota Power Reply Comment EA Scoping, February 23, 2022, eDocket No. 20222-1831103-02.

displaced if this alternative route segment is selected. Additionally, the Neitzel Alternative Route Segment would place the transmission line closer to more residences than the same segment of the Proposed 115 kV Route. The Neitzel Alternative is also slightly longer than this segment of the Proposed 115 kV Route.

While the wetland acreage within the Proposed 115 kV Route is greater than that of the Neitzel Alternative Route Segment, these are existing impacts as the Proposed 115 kV Route follows the existing ROW of 71 Line through this area.

Based on their analysis, Minnesota Power continues to support the Proposed 115 kV Route as they believe it best satisfies the routing criteria set forth in Minnesota statute and rule and urge the Department not to include the Neitzel Alternative Route Segment in the EA scope.

EERA Staff Analysis and Recommendation

EERA provides technical expertise and assistance to the Commission.⁴⁰ EERA and the Commission work cooperatively, but function independently to meet their respective statutory responsibilities.

The scoping process for environmental review in Minnesota is designed to identify and analyze "only those potentially significant issues relevant to the proposed project" and alternatives to the project.⁴¹

EERA is currently drafting, for the Department of Commerce Assistant Commissioner's consideration, its recommendation on the EA *Scoping Decision* for the Duluth Loop Reliability project under the alternative review process. The recommendation for the scope of the EA will cover those items required under Minnesota Rule 7850.3700 subpart 4.

In addition to the generic categories found in the *Factors Considered*⁴², the EA will address those area specific concerns raised in the scoping comments received.

EERA staff is currently not recommending any alternative routes, alternative route segments, and/or alignment modifications be included in the *Scoping Decision*. As to the Neitzel Alternative Route Segment, EERA concurs with Minnesota Power's conclusions. EERA would add, that in addition to Minnesota Power's analysis, given the distance from the existing Line 71 (and therefore from the new, proposed double-circuit Line 71/176) to the Neitzel residence, potential impacts from EMF are expected to be negligible.

The following issues will not be included in EERA's scoping decision recommendation:

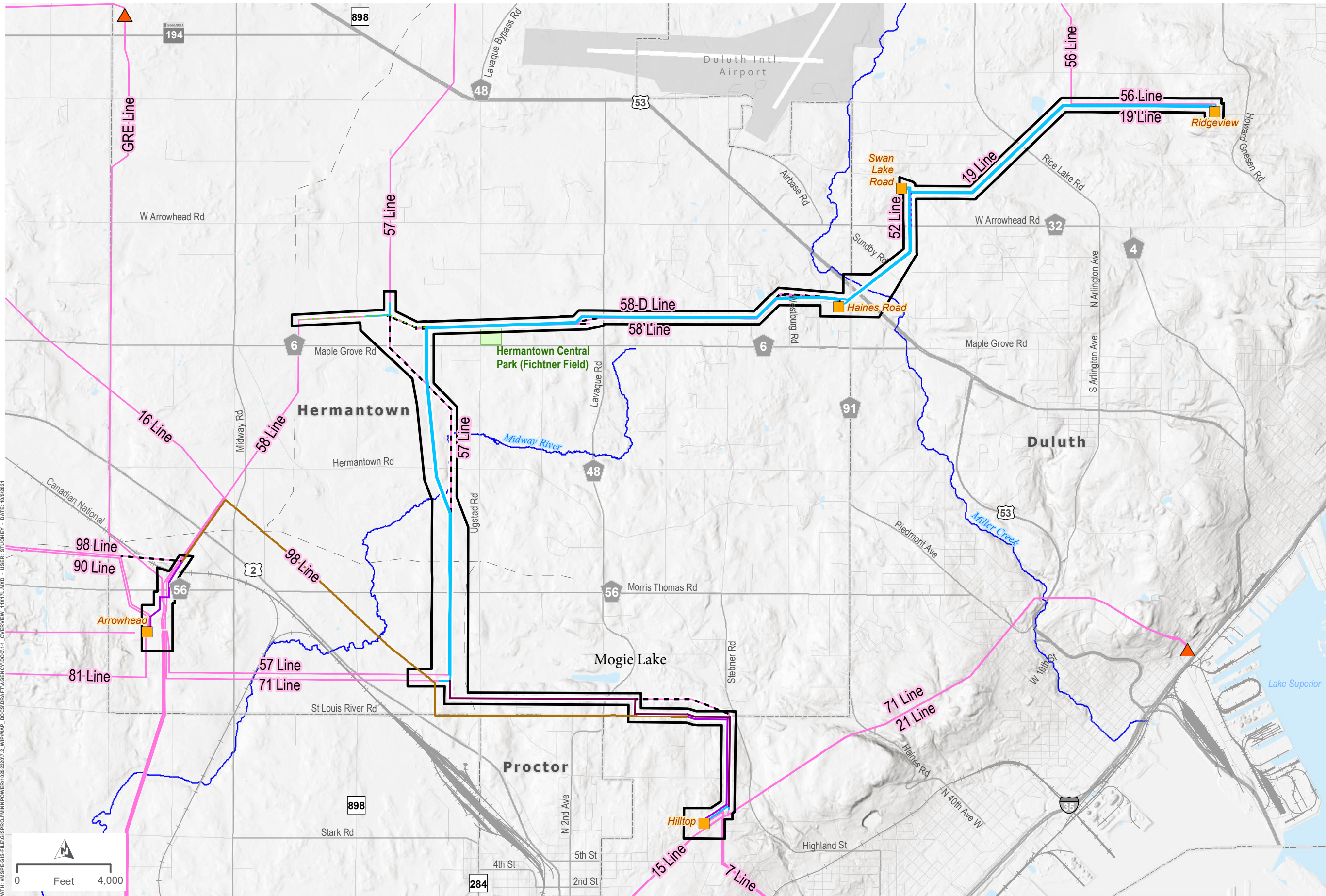
- The impacts of specific energy sources, such as carbon outputs from coal-generated facilities.
- The manner in which landowners are compensated for transmission rights-of-way easements.

⁴⁰ Minn. Stat. 216E.03, subd. 11.

⁴¹ Minnesota Rule 4410.2100, Subp. 1.

⁴² Minnesota Rule 7850.4100.

Figures



- LEGEND**
- Proposed Route
 - Project Substation
 - ▲ Non-Project Substation
 - Relocated Distribution
 - Project 115 kV Transmission Line(s) (Single Circuit)
 - Project 115 kV Transmission Line (Double Circuit)
 - Project 230 kV Transmission Line (Single Circuit)
 - Removed Transmission Line (Realigned)
 - Thermal Upgrades
 - New Underground Fiber
 - Existing Transmission Line
 - Existing Pipeline
 - Waterbody
 - Public Water Watercourse
 - Park
 - Airport
 - Railroad
 - City Boundary

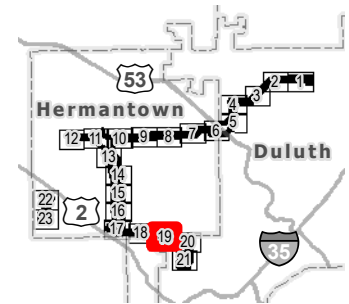
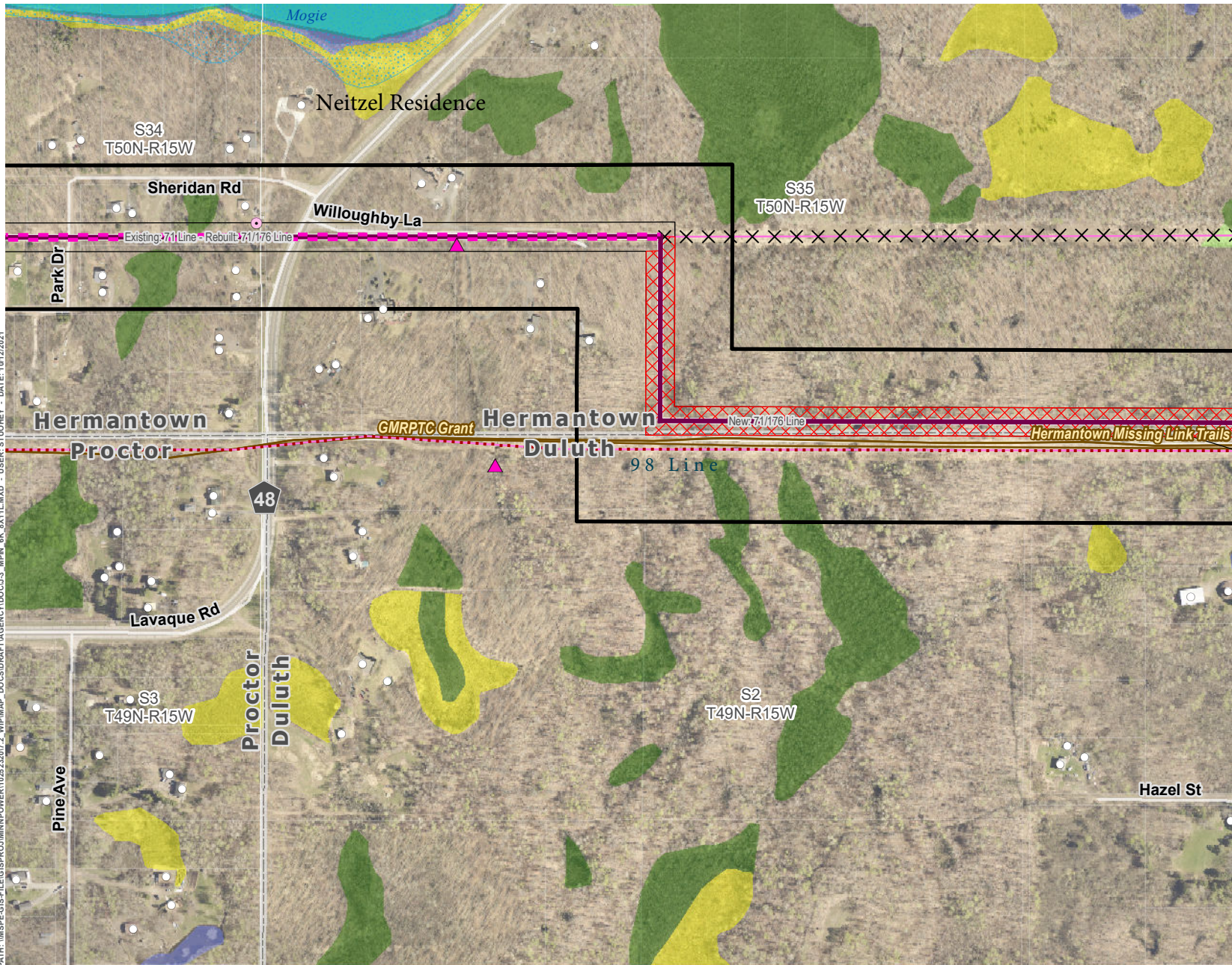
NOTE: ONLY EXISTING LINE LABELS ARE PROVIDED FOR REFERENCE. FOR FURTHER DEFINITION ON FINAL LINE CONFIGURATIONS AND DESIGNATIONS, SEE MAP 2-4 PROPOSED SYSTEM OVERVIEW OR APPENDIX K-3



DULUTH LOOP PROJECT OVERVIEW
DULUTH LOOP RELIABILITY PROJECT

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- LEGEND**
- Proposed Route
 - Approximate ROW
 - Approximate New Impact Area
 - Project 115 kV Transmission Line (Double Circuit)
 - Removed Transmission Line (Realigned)
 - Thermal Upgrades
 - Proposed Line Marking
 - Existing Structure
 - Structure in ROW
 - Existing Transmission Line
 - PWI Basin
 - Existing/Proposed Trail
 - Unmapped Tributary
 - FEMA Floodplain
- National Wetlands Inventory**
- Freshwater Emergent Wetland
 - Freshwater Forested Wetland
 - Freshwater Shrub Wetland
 - Freshwater Pond; Lake; Riverine

*Note: Removals shown for significant realignments only. Line removals associated with the reconstruction of transmission lines, including minor centerline shifts are not indicated for clarity purposes. See Proposed System Overview for further definition on final line configurations and designations.



**PROJECT DETAIL - HILLTOP TO HAINES ROAD
DULUTH LOOP RELIABILITY PROJECT**

Figure 2 Mogie Lake, Neitzel Residence, Proposed Line 71/176

Attachment 1

From: [Lisa Neitzel - Surge Communications](#)
To: [Storm, Bill \(COMM\)](#)
Cc: [Lisa at home](#); [Rob at Home](#)
Subject: Duluth Loop Project
Date: Friday, February 4, 2022 7:44:14 PM

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello,

It was nice talking with you at the public input meeting regarding the Duluth Loop in Hermantown. If you remember, I was the one that stood up and commented how I was concerned about both Mogie Lake that my family and I live on and the abundant wildlife that use the lake, the wetlands and our 38 acres of wooded property. The line will go right behind my neighbors house, across the street. Another very extreme concern is my daughter's hearing sensitivity to high voltage electricity. This frequency gives her bad headaches and other health issues. We built our dream house here and we don't plan on ever leaving and our daughter and son will inherit the home after we have passed on. We are very concerned about the monpoles that are going to be going up. We have a possible alternative route, but we would need to write it out on the map that was given to us or another type of map. When can we give you that—is there a deadline?

We really don't want to see the lines go in so close to our home with our daughter, and also so close to such a wonderful natural habitat. Please let me know where we go from here. We can get you the map with the alternative route, and we would like to make sure our concerns, complaint and opposition to this current route are heard. We don't want to have this project go through as is and then have to hire a lawyer and fight this after the fact when the environment and our family is suffering.

Besides the alternative route map, please let me know what we need to get to you to make sure our opposition is heard, understood and heeded.

Thanks so much for your help!

Lisa and Rob Neitzel

Surge Communications, Innovations & Online Services

Lisa Neitzel | *Owner/President*

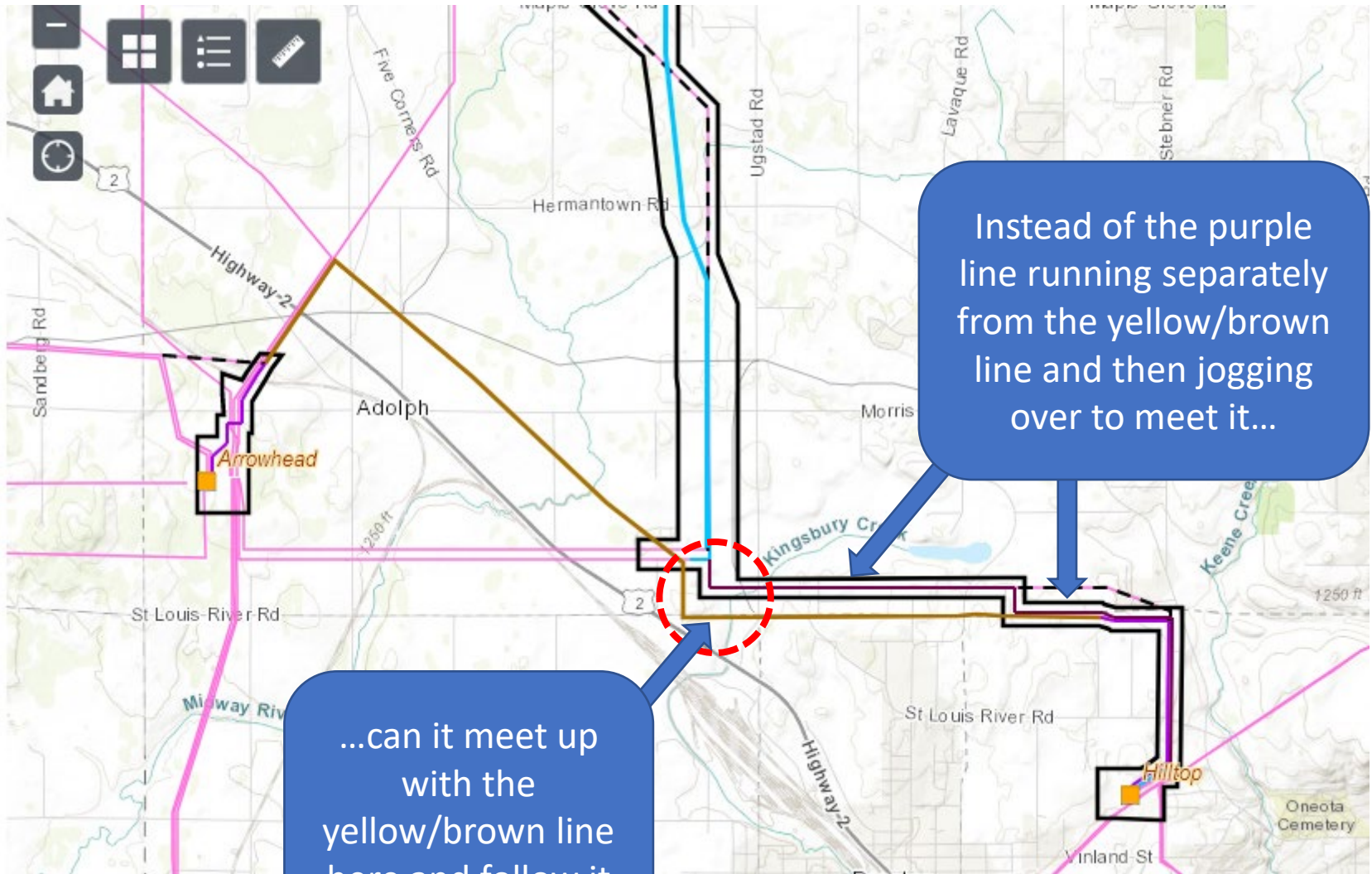
lisa@surgetoday.com

Twin Ports Location: (218) 409-4075

Twin Cities Location: (612) 367-6567

www.surgetoday.com

Duluth Loop proposed route modification

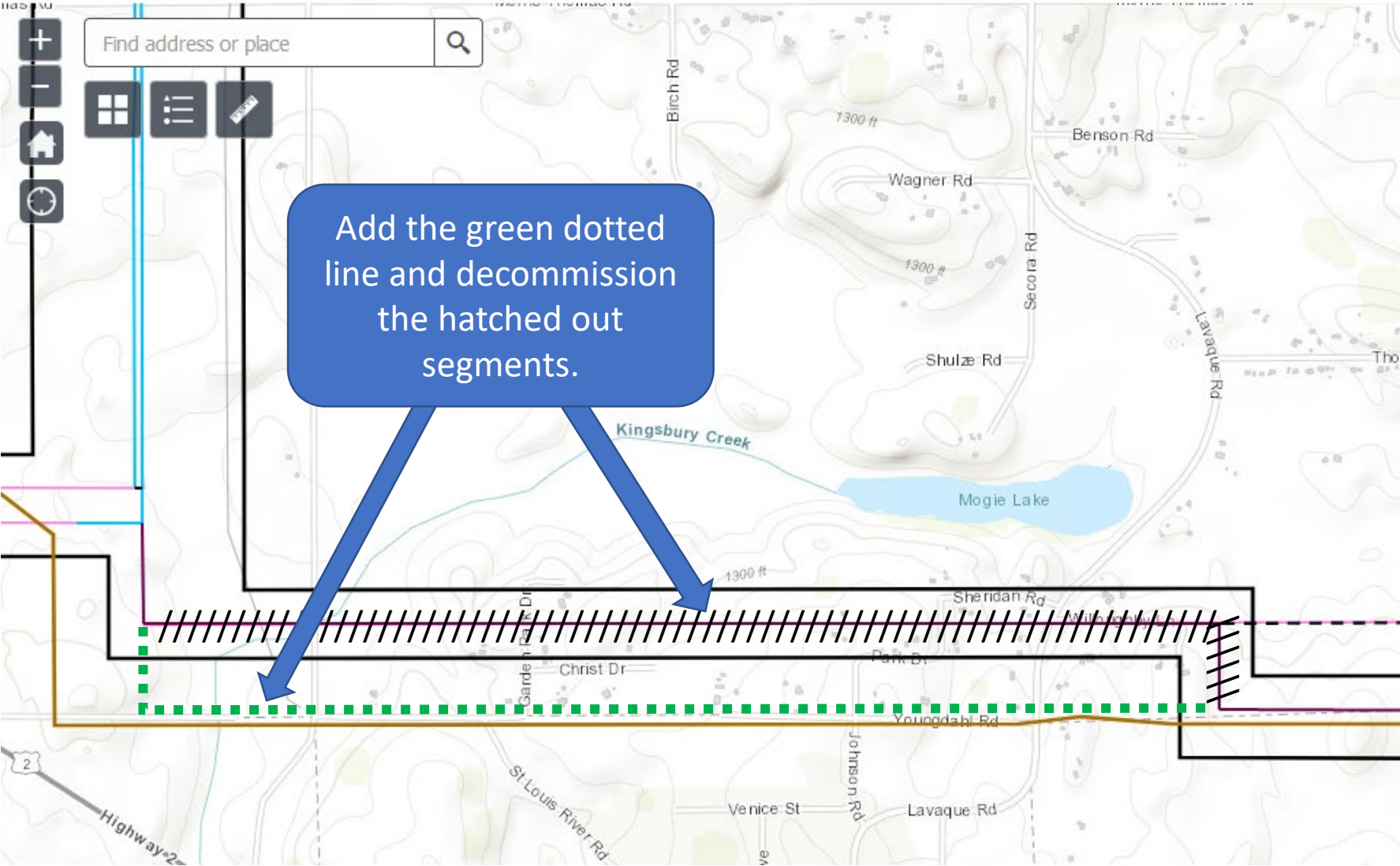


...can it meet up with the yellow/brown line here and follow it the whole way?

Instead of the purple line running separately from the yellow/brown line and then jogging over to meet it...

See zoomed in view on next page.

Duluth Loop proposed route modification



Attachment 2



February 23, 2022

Bill Storm
Minnesota Department of Commerce
Suite 280
85 7th Place East
St. Paul, MN 55101-2198

Re: *In the Matter of the Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project*
MPUC Docket No. E015/CN-21-140

Re: *In the Matter of the Application of Minnesota Power for a Route Permit for the Duluth Loop Reliability Project.*
MPUC Docket No. E015/TL-21-141

Dear Mr. Storm:

Minnesota Power submits the following response to the comments submitted on the scope of the Environmental Assessment (“EA”) being prepared by the Department of Commerce Energy Environmental Review and Analysis (“EERA”) for the Duluth Loop Reliability Project (“Project”). Minnesota Power also provides an analysis of the one route segment alternative that was put forth for evaluation in the EA.

Response to Questions About the Project

EERA conducted two public scoping meetings (one in-person and one virtual) during the public comment period to solicit comments on the scope of EA. EERA also accepted written comments on the scope of the EA until February 4, 2022 and filed copies of these written comments in the above-referenced dockets on February 10, 2022. Several of the verbal and written comments received during the scoping process included questions about the Project. Minnesota Power’s response to these questions are provided in **Attachment A** to this letter.

Analysis of Route Segment Alternative

During the scoping period, one route segment alternative was proposed by Laura Neitzel. This route segment alternative is located where the Proposed 115 kV Route turns east following the 71 Line to just east of Lavaque Road. In this section of the Proposed 115 kV Route, the new 115 kV is proposed to be double circuited with the existing 71 Line along and within the existing right-of-way of the 71 Line. This route segment alternative

involves shifting the Proposed 115 kV Route south approximately 0.5 mile to follow the existing 98 Line on the north side (“Neitzel Alternative”). A map showing the Neitzel Alternative is included as **Attachment B**. The Neitzel Alternative would require additional right-of-way of approximately 75 feet to accommodate a new 115 kV line adjacent to the existing 98 Line.

The Neitzel Alternative includes route segments that Minnesota Power had previously evaluated during the route development process prior to submitting its Certificate of Need and Route Permit application to the Minnesota Public Utilities Commission in October 2021. These route segments were rejected by Minnesota Power due to the need for additional right-of-way and greater impacts to homes and buildings as compared to the Proposed 115 kV Route. Minnesota Power did, however, re-analyze the Neitzel Alternative and compare it to this portion of the Proposed 115 kV Route for purposes of this response. For comparison purposes, the Neitzel Alternative was placed 65 feet north of the existing 98 Line with 50 feet of right-of-way on each side of the proposed 115 kV transmission line. Table 1 provides a comparison of these two route segment alternatives based on certain routing criteria.

Table 1. Comparison of Route Segment Alternatives

Routing Criteria	Proposed 115 kV Route	Neitzel Alternative
Residences within right-of-way	0	4
Residences within 100 feet from right-of-way	2	4
Residences within 250 feet from right-of-way	15	19
Residences within 500 feet from right-of-way	25	33
Wetland Acres within ROW	2.74	0.38
Total Length of Route Segment	8,580 feet	8,630 feet

As shown in Table 1, there are four homes within the right-of-way of the Neitzel Alternative that would need to be removed if this route segment alternative is selected. In addition, the Neitzel Alternative has greater impacts to residences as there are more homes located within 100, 250, and 500 feet of the right-of-way of the Neitzel Alternative as compared to the same segment of the Proposed 115 kV Route. The Neitzel Alternative is also slightly longer than this segment of the Proposed 115 kV Route. While the wetland area within the Proposed 115 kV Route is greater than that of the Neitzel Alternative, these are existing impacts as the Proposed 115 kV Route follows the existing right-of-way of 71 Line in this area.

February 23, 2022

Page 3

Based on this analysis, Minnesota Power continues to support the Proposed 115 kV Route as it best satisfies the routing criteria set forth in Minnesota statute and rule. As a result, the Neitzel Alternative does not need to be further analyzed in the EA.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim B. Atkinson". The signature is written in a cursive style with a large initial "J" and "A".

Jim Atkinson
Environmental and Real Estate Manager
Minnesota Power

ATTACHMENT A

Committer/Date	Comment/Questions	Minnesota Power's Response
<p>Candy Lee, email dated 2/1/22</p>	<p>Hello, I was not able to attend the meeting that occurred on the 27th, I have 10 acres at the end of W. Morgan St. in Duluth, a power line currently does cut through the corner of my property, my questions are: How much wider would the new line be? (is it going to be much larger than the current line?) Are landowners being compensated for use of additional land? I will be checking the state website to see what questions were asked at the meeting to find more info also. If you could let me know what you know it would be greatly appreciated. Thank you!</p>	<p>-Minnesota Power has existing right-of-way rights for the existing transmission line. -Additional right-of-way may be needed for the Project and if so, landowners will be compensated for these additional rights. -Specific details as to amount of new right-of-way that will be needed for the Project will be provided by Minnesota Power's land agents when they meet with you individually to discuss your property.</p>
<p>Grant Forsyth, verbal comment at 1/26/22 public meeting</p>	<p>My name is Grant Forsyth. I'm the zoning administrator for the Town of Midway. And a couple of concerns that just kind of popped up, is on line 98 where it goes parallel to the St. Louis River Road to the Ugstad Road, that is a section of that line that Midway issued the permits and the right-of-ways and everything for that line to go in. Since that line going in, we've been advised that Kingsbury Creek, which runs right through that area, is now an impaired trout stream, and it comes out of, I call it Mogie Lake. And because of that, we're very concerned about stream crossings there. It's not a big creek, but it's a very soft area on the bottom, it would be wetlands, and we're concerned about herbicides. If you're putting any new poles in that area, we would want them 300 feet from the normal high water mark of that stream to span that environmental protection area. And I work with the DNR and the EPA and a bunch of people right now in trying to get that stream back up so it's not impaired. Because the PCA has said if we don't get it corrected in a reasonable period of time, they're going to put restrictions on everything up and down that stream in that area. So we're working hard and we'd need your help.</p>	<p>-In this area where the Proposed 115 kV Route crosses Kingsbury Creek, Minnesota Power is proposing to construct the new 115 kV line as a 115/115 kV double circuit line with the existing 71 Line. -Minnesota Power is aware that Kingsbury Creek is an impaired stream and will work with the Minnesota Department of Natural Resources ("MnDNR") to obtain a license to cross Kingsbury Creek. Minnesota Power will also work with the MnDNR to minimize impacts to Kingsbury Creek. Potential mitigation measures are discussed in Section 7.5.2.3.1 of the Application.</p>

ATTACHMENT A

Commenter/Date	Comment/Questions	Minnesota Power's Response
<p>Kris Lijebald, email dated 1/23/22</p>	<p>I am commenting on behalf of the Northridge Estates Association, of which I am President. We are an affected property owner within the shared segment of 56 and 19 transmission lines west of the Ridgeview Substation, between Howard Gnesen and Rice Lake Roads, which is the proposed route of a new 115 kV transmission line. Our association has followed the project previously and has been in contact with Jim Atkinson of Allete to share our concerns, summarized as follows to address your project scoping questions: 1) Our NEA acreage is dedicated in perpetuity to the Minnesota Land Trust which strictly restricts possible uses and must be considered in your EA and your location decision-making; 2) To minimize impacts, maximum effort should be made to restrict the footprint of the new 115 kV line to the right of way containing the existing 56 and 19 transmission lines; 3) The East Branch of Chester Creek, a designated trout stream, crosses the existing power line adjacent to NEA's property (not shown on your map). Potential impacts and mitigations should be carefully considered to preserve and enhance this treasured resource; and 4) Management of vegetation under these power lines in the future should include greater efforts to eradicate invasive species, especially buckthorn, and to benefit wildlife.</p> <p>Thank you for this opportunity to comment.</p>	<p>-Minnesota Power is not planning to expand the right-of-way in this area.</p> <p>-Minnesota Power is working with MnDNR on the crossing of Chester Creek.</p>
<p>Kris Lijebald, written comment submitted at 1/26/22 public meeting</p>	<p>Northridge Estate Association property is located just west of the Ridgeview Substation. The property is dedicated to conservation use in perpetuity as part of the MN Land Trust. As a result, effort is necessary to avoid or minimize greater impact on these lands and coordination with the MN Land Trust will be vital.</p> <p>The east branch of Chester Cr. crosses the existing power line within NEA's vicinity. This is a designated trout stream and efforts will be necessary to minimize</p>	<p>-See response to email above.</p>

ATTACHMENT A

Committer/Date	Comment/Questions	Minnesota Power's Response
	<p>impacts short and long on the stream.</p> <p>To minimize right-of-way impacts we urge the Allete implementation of the new 115 kV line in our area to fit within the existing ROW which seems of adequate width for that purpose.</p> <p>Thank you for this opportunity to comment.</p>	
<p>Kevin Sleen, verbal comment at 1/26/22 public meeting</p>	<p>I live on Hermantown Road, and right now I have no power lines the way it sits. I kind of enjoy that. And the proposal from our understanding is that they want to move it away from where it's at right now. Which, you know, we bought our property the way we did because it's thick woods and we love that, and now to find out that they want to move it from where it sits right now, to me it's already impacting something where it is now.</p> <p>And we really, you know, we talked about splitting off a piece of property and selling it as income as we get older and now they want to put a power line right through the middle of that. It's going to really impact us a lot. Like I said, right now I have no power line, there was no power line when I moved in, and there was no talk of a possible power line until this line came up, and I'm wondering why it can't stay where it is at right now. It's already cleared, 200 feet wide of cleared land.</p>	<p>-During the route refinement process, Minnesota Power received comments from the MnDNR recommending that the Proposed 115 kV Route be located away from the Midway River, a waterway designated by MnDNR as a trout stream.</p> <p>-To minimize impacts to the Midway River, Minnesota Power's Proposed 115 kV Route is located 400 to 900 feet west of the Midway River on new right-of-way.</p> <p>-To further minimize impacts to the Midway River, the existing 57 Line the currently parallels the Midway River is being removed and relocated to the Proposed 115 kV Route.</p>
<p>Michael Kopy, verbal comment at 1/26/22 public meeting</p>	<p>And so my concern area is west of the Lavaque Road. I'm a volunteer for the city of Hermantown, we've worked on the trails in Hermantown and I coordinate the volunteers. And we have a trail there called Rocky Run and my understanding is that the line going west of the lake there, which is where Rocky Run is, that that line is going to get moved northward, which would take out all the foliage where the trail is existing right now, which does go across Minnesota Power's property, but Minnesota Power gave the city permission to put that trail in there.</p>	<p>- Minnesota Power owns the parcel being discussed here. The existing parcel has two transmission lines entering from the west and exiting to the east. The existing transmission lines crossing this property need to be reconfigured. The Hermantown Police Department is utilizing a southeast portion of the property for training</p>

ATTACHMENT A

Commenter/Date	Comment/Questions	Minnesota Power's Response
	<p>Right now, you know, the power line runs through there. I don't know why, if you could explain to me why the power line has to get moved more north when there's already that easement there, why could they not continue to run on the same easement that they have right now. I understand that further east there's some problems with homes have moved some of their properties closer to the easement or something, and so that's one reason the line was getting shifted, but that would be east of the lake. So I'm talking about to continue to have that trail that's used by thousands of residents in Hermantown all-year-round, and in the winter now you can go to that trail and that trail is half down because so many people use it.</p> <p>But I just have concern about us and being able to maintain, you know, an environmentally friendly trail that people enjoy using and not just something that is out in the open under a power line. So, I mean, I realize that we could still have a trail there, but there's a big difference when you are walking on a trail and going through the woods as opposed to walking underneath the power line. That's the concern that I have, it changes the whole effect of the trail.</p>	<p>purposes. To avoid interruption to the southeast portion of this property, Minnesota Power is proposing to keep right-of-way along the north edge of this property but avoiding wetlands in the northwest corner of this parcel. Minnesota Power will continue to allow the trail to cross its property, although the exact route of the trail may need to be adjusted depending on the final alignment of the transmission line.</p> <p>-Minnesota Power will need to clear the existing vegetation within the right-of-way during construction of the transmission line but compatible species will be allowed to regrow within the right-of-way.</p>
<p>Kevin Sleen, verbal comment at 1/26/22 public meeting.</p>	<p>I just had a question about what type of power lines are going by my house. Is it the one or the two, or how do I know? It doesn't really tell you anywhere whether it's one line or two lines or how wide it's going to be when it comes through my property.</p>	<p>-The proposed structures are wood H-frames with two parallel 115 kV circuits.</p> <p>-The two 115 kV transmission lines will share a 160 foot wide right-of-way.</p>
<p>Jeff Richtman, verbal comment at 1/26/22 public meeting</p>	<p>Kind of two levels of questions, I guess, as far as the environmental impact stuff goes. So Minnesota Power has a line behind my house at this point, they don't have a right-of-way or an easement, they came through a couple years ago and did massive spraying, over sprayed on our property, obviously well over the boundaries of where they should have been. I'm wondering, is there anything that's taken into effect on the environmental impact as far as their</p>	<p>-Minnesota Power's vegetation management practices are described in section 6.4 of the Application.</p> <p>-The width of the right-of-way will increase along some portions of the Proposed 115 kV Route.</p>

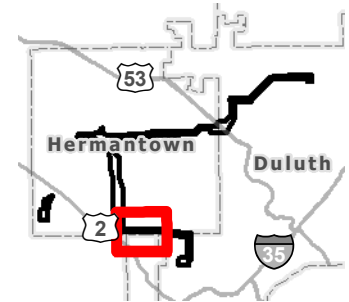
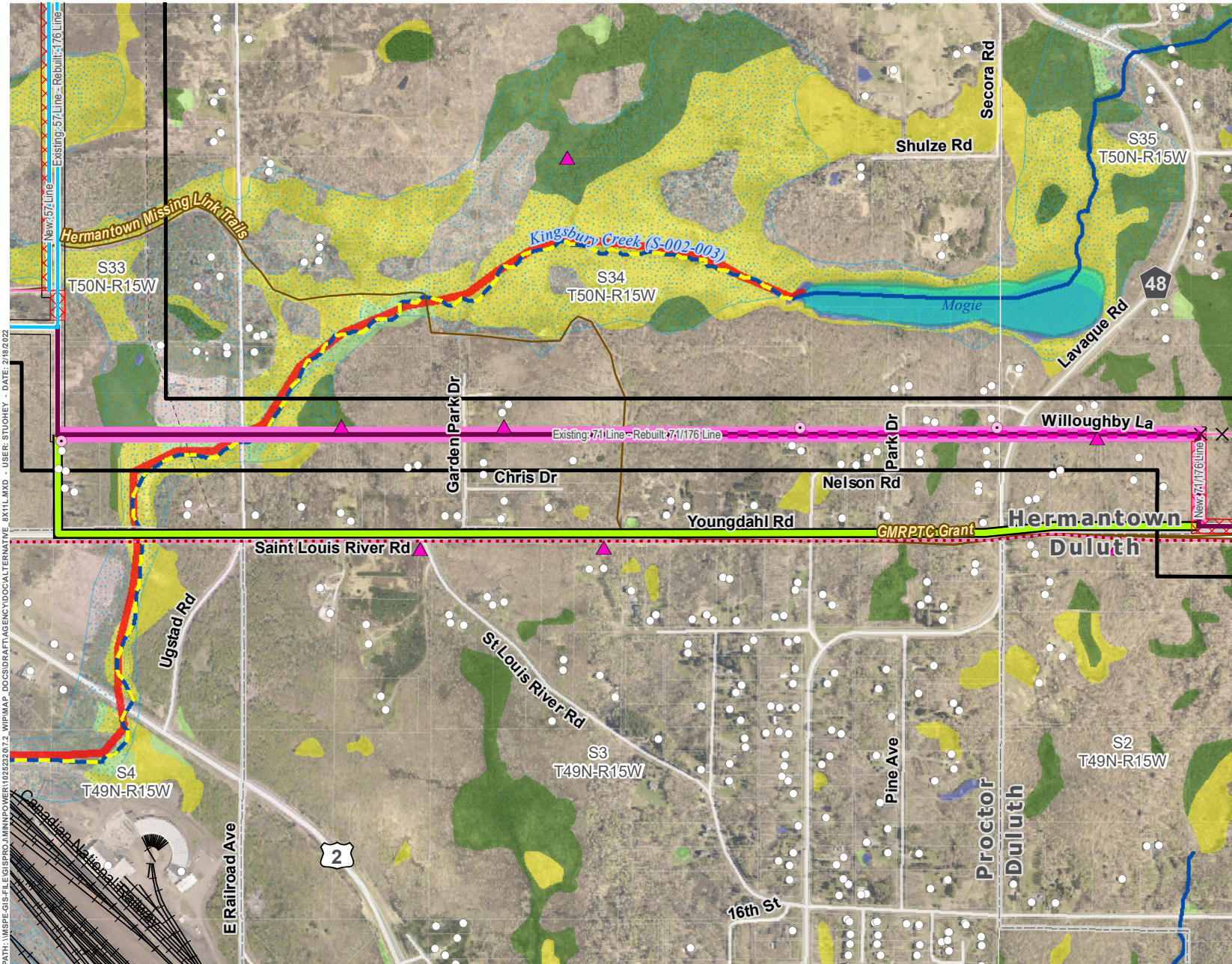
ATTACHMENT A

Commenter/Date	Comment/Questions	Minnesota Power's Response
	<p>accountability on their actions when they're working on this line that's, you know, going to get upgraded? And what impacts there are because of that? You know, if they come through and they decide they want to kill everything with herbicide instead of mulching it, or they want to drive vehicles through and destroy wetlands, what's to say they can or can't do that, and is that something that you work on making sure that doesn't happen?</p> <p>Your presentation mentioned essentially this is an upgrade for most of it, you know, wood poles, adding a second line, and then you casually threw in something about essentially doubling the right-of-way when you add a second line. Is the right-of-way likely to increase if the line voltage has an increase or are we talking similar?</p> <p>Okay. So those of us that are on existing line and we're getting this notice -- I guess, this map is terrible. So it sounds like you have somebody on the computer, that's great, and I think everyone in this room is in agreement that this map is useless, right? So is the right-of-way growing? Are you gaining more access here because --</p> <p>I don't know how that process plays out. Obviously, you're going to take our land, right? So is that like an offline conversation we can have about that?</p>	
<p>Stacy Koch Egstad, Minnesota Department of Transportation ("MnDOT"), written comment letter dated 2-4- 22</p>	<p>MnDOT On January 10th, 2022, the Minnesota Public Utilities Commission (PUC) and the Department of Commerce (DOC) issued a Notice of Public Information and Environmental Assessment Scoping Meeting and a request for public comment on the scope of the environmental assessment (EA) relating to the route permit application by Minnesota Power (Applicant) for the above-mentioned project. The Minnesota Department of Transportation (MnDOT) has reviewed the application regarding</p>	<p>-Minnesota Power plans to continue coordinating with MnDOT regarding the crossing of Minnesota Trunk Highway (TH) 53.</p>

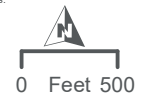
Committer/Date	Comment/Questions	Minnesota Power's Response
	<p>the proposed project and submits the following comments in response to the Notice. MnDOT appreciates the opportunity to comment on the scope of the EA. MnDOT wishes to participate in the development of the EA so that it will contain a thorough evaluation of the effects various route proposals may have on the state transportation system. MnDOT's fundamental interest is to ensure that the EA identifies and quantifies, to the extent possible, any impacts the proposed high voltage transmission line (HVTL) may have on the safety of the transportation system, the effectiveness of the operations or maintenance of the state trunk highway system and any additional costs that may be imposed on the state trunk highway fund as a result of the location of the proposed HVTL. The Applicant has proactively consulted with MnDOT during the planning phase of this route. Pages 21-23 (attached) of Appendix M in the Application correctly reflect discussion topics, areas of concern, and key factors associated with the proposed HVTL crossing of Minnesota Trunk Highway (TH) 53. MNDOT believes that the Applicant has a thorough understanding of the challenges presented in crossing TH 53 in this area. Since our discussions in early 2021, new challenges to the placement of this line have been revealed with the Miller Creek Meandering Project. MnDOT has participated in one meeting regarding said project and while the HVTL crossing in this area is still feasible from our perspective, further discussions with the Applicant are required on the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Pole placement – the specifics of where the northeast pole, relative to TH 53, can safely be constructed will need to be agreed upon between the DNR, the Applicant, and MnDOT. <input type="checkbox"/> Construction/Permanent Access – the safest point of access for the same northeast pole is still undetermined as 	

ATTACHMENT A

Commenter/Date	Comment/Questions	Minnesota Power's Response
	<p>the surrounding area presents several access challenges. Because MnDOT will allow temporary access for construction but not permanent, the Applicant may need to acquire other landowner approvals for both temporary and permanent access to this part of the project area.</p> <p>MnDOT anticipates working through these challenges with Minnesota Power, the DNR and other parties in the very near future to come to an acceptable resolution for all. While the proposed HVTL will likely require one Utility Accommodation on Trunk Highway Right of Way Permit, the Applicant may need more than one type of permit (MnDOT Permit Forms) such as oversized/overweight hauling and other highway access permitting.</p> <p>Should the PUC issue a route permit for the Duluth Loop Reliability Project, early coordination with MnDOT staff is strongly encouraged. All applicable permitting, traffic control and construction coordination efforts should be done through MnDOT's District 1 Engineering Specialist, Wayne Scheer at 218-725-2780 / Wayne.Scheer@state.mn.us or Transportation Specialist, Shane Gries at 218-725-2779 / Shane.Gries@state.mn.us</p> <p>Thank you for the opportunity to provide these comments.</p>	



- LEGEND**
- Applicant Route
 - Neitzel Alternative
 - Proposed Route
 - Approximate ROW
 - Approximate New Impact Area
 - Project 115 kV Transmission Line (Single Circuit)
 - Project 115 kV Transmission Line (Double Circuit)
 - Removed Transmission Line (Realigned)
 - Thermal Upgrades
 - Proposed Line Marking
 - Existing Structure
 - Structure in ROW
 - Existing Transmission Line
 - Existing Pipeline
 - PWI Basin
 - Railroad
 - Existing/Proposed Trail
 - Impaired Water
 - Designated Trout Stream
 - Unmapped Tributary
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- *Note: Removals shown for significant realignments only. Line removals associated with the reconstruction of transmission lines, including minor centerline shifts are not indicated for clarity purposes. See Proposed System Overview for further definition on final line configurations and designations.



PATH: \\MSPE-GS-FILE\SPROJ\MINPOWER\1025252072_WIPMAP_DGCSIDR\AFI\AGENCY\DOCCAL\TERNATIVE_8X11\I.MXD - USER: STUOHNEY - DATE: 2/18/2022



**NEITZEL ALTERNATIVE
DULUTH LOOP RELIABILITY PROJECT**

FIGURE 1