From:	Paulette K. Hagberg
To:	Davis, Richard (COMM)
Cc:	Jeanne Wendschuh; Jim & Cheryl
Subject:	Docket E002/CN-22-532, E002/TL-23-157
Date:	Wednesday, July 31, 2024 8:22:19 PM

Mr Davis,

Our property is in the 2 North section of the Mankato to Mississippi River Transmission Project.

While the 2 North route requires only widening rights of way, it is longer route and crosses more rivers and streams. This route would necessitate removal of many ancient burr oak trees that line the rivers and uphold the riverbank structures. On our particular segment, for instance, these oaks line limestone bluffs. Removing trees for power lines will cause limestone to crumble and destroy structure, possibly altering the course of rivers. We are advocating the environmental preservation of the oak savannas and rivers in our area.

If the 2 North segment is chosen, we would ask that the rights of way are expanded away from rivers and trees, rather than equidistant from the existing line.

As to the need of the project, we're aware that there are several other proposals for expansion and certainly, we don't need all of them.

Thank you for the opportunity to comment.

Paulette Barnhart, Trustee
Mavis Kyllo Trust
Wanamingo Township

From: eera.admin_no_reply@state.mn.us
To: Davis, Richard (COMM)
Subject: Public Comment re: Mankato to Mississippi River Transmission Project
Date: Thursday, July 18, 2024 10:19:51 AM

Mankato to Mississippi River Transmission Project

Submitter Name: Tim and Jean Bye

Submitter Email: jeanebye@gmail.com

Submitter Telephone: (507) 381-1520

Comment:
We are writing to offer our comments regarding the routing of Segment 1 of the Mankato-Mississippi River Transmission Project. We would respectfully request that the south route be selected over the north route. The reasons for that request is that the south route puts this additional infrastructure in an area that already has more infrastructure and allows the more remote areas to remain more remote. As you drive across Minnesota and compare it to 20 years ago, you can already see that everywhere you look there is more and more human impact and less and less natural areas. To the degree possible if we can keep these human impacts mostly in the same areas/corridors it will allow us to leave other areas more natural which is in the best interest of all?. For people to be able to experience nature as much as possible is an important priority. The south route is better for this density of impact because: 1) The south route follows 8.09 miles of roads and railroads versus 1.63 for the north route. Not only does putting the line along these roads and railroads contribute toward keeping infrastructure dense, but I would think there is likely also an advantage for the power company in it being easier/less disruptive when repairs or maintenance is needed to have road access as opposed to having to move through fields. But following roads whenever possible will allow other parts of our countryside to remain less urbanized which is an important advantage to both people and animals. 2) Similarly ? the south route has less impact on deciduous forest, emergent herbaceous wetlands, woody wetlands, mixed forest and less open water in the right of way. Conversely there is more baren land in the right of way. The south route has less impact on animals and the environment. 3) Additionally the south route has fewer wetlands within the right of way which would be impacted. 4) The north route has 14 DNR native plant communities while the south has only 3 that would be impacted. 5) The north route has 11 Minnesota biological survey sites versus 4 for the south route In summary, the south route would have less impact on the environment, less impact on animal habitat, and lower the human impact by keeping the infrastructure needed to service our society more densely packed into fewer corridors leaving other areas less impacted. Please select the south route for segment 1 of this project. Sincerely, Tim and Jean Bye

Submit Date: 07/18/2024 03:19 PM

July 18, 2024

Richard Davis
Minnesota Department of Commerce
85 7th Place E Suite 280
St. Paul, MN 55101

Re: Xcel Energy Proposal to build a new 135 Mile 345KV transmission line.

Dear Mr. Davis,

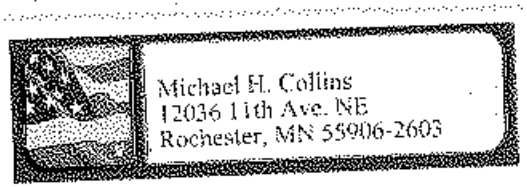
Due to a severe injury sustained on June 8th, 2024, I was unable to attend the public meeting held June 9th 2024 at the Pine Island High School. Therefore, I am writing you this letter expressing my deepest concern regarding Xcel Energy's proposal to build a new 135 Mile 345KV transmission line along with a new 20-mile 161KV line which will run alongside our homestead. My name is Michael H. Collins and myself along with my family live at 12036 11th AVE NE Rochester, MN 55906. Our home resides in section 12 Oronoco Township and within the projects study area where there is an existing transmission line also known as proposed route option 3. Our home is located just off Olmsted County RD 114. Presently, the existing line runs along our fence line and on our neighbor's property which is owned by Mrs. Lorraine Hoeft. These existing transmission lines are less than 100 feet from our front door. After a compete review of the entire existing route, I have found nowhere along this existing route where these extremely high voltage transmission lines are located as close to a homestead as they are to our home. We objected to these transmission lines being located where they exist today when they were proposed a few years ago. We were told that because they were not going to be constructed on our land that we had no rights.

We have serious health concerns and have suffered rapid health decline since these transmission lines have been constructed near our home. The proposed increase to 345KV poses imminent danger and certain death to our family. Again, these transmission lines are currently less than 100 feet from our front door and our bedroom windows. These transmission lines hum and whistle constantly at their current capacity. With the proposed drastic increase in KV our near-term existence will certainly suffer, and we will all certainly meet an early demise.

The European nations more specifically Germany have conducted proven studies which are accepted worldwide showing that prolonged exposure to this level of electromagnetic fields poses a grave danger to human existence. Please advise, I will look forward to hearing from you along with Xcel Energy in the very near future. Meanwhile, should you have further questions or comments please do not hesitate to contact me on my cell phone 507-272-6471 or email at firststbk@steepyeyetel.net.

Sincerely,

Michael H Collins



Michael H. Collins
12036 11th Ave. NE
Rochester, MN 55906-2603

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MINNESOTA DEPARTMENT OF COMMERCE
C/O RICHARD DAVIS
857TH PLACE EAST SUITE 280
ST. PAUL, MN 55101

55101-601393

CFERS, LLC Comments on Docket Number: E002/CN-22-532, TL-23-157

Introduction

I am Michael W. Chase, President of CFERS LLC. CFERS is a collection of ~75 landowners and citizens of the State of MN who banded together as a rural neighborhood coalition to address issues that threaten our local environment. Our acronym name "CFERS" is "Citizens For Environmental Rights & Safety". Our membership selected me as President based on my technical background, professional credentials and as a resident of Cherry Grove Township since 1995. Our organization was founded ~ 2007 when Kenyon Wind LLC attempted to site multiple Suzlon 2.1 MW turbines in the rural area where our members reside and/or own property. We were successful in our collaborative approach and the project was not constructed.

As President of CFERS, LLC I now offer these scoping comments in response to the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota, Docket Number: E002/CN-22-532, E002/TL-23-157.

My responses are focused on the most relevant and/or egregious portions of this project, but I reserve the right to respond to other aspects of this docket number as the project evolves. My comments are directed at the concerns expressed by our members related to Environmental Rights and Safety—and there are many – that should be explored, addressed, considered or compared in the EIS.

To enhance consideration of our concerns, wherever possible I will quote the section and/or page of the Project Application for a Certificate of Need and Route Permit for the Mankato – Mississippi River Transmission Project--dated April 2, 2024. To facilitate ease of reporting and reading, I am documenting these comments in the order that they appear in your Project Application, but in some cases have found it prudent to link several sections or to reprint comments made in an earlier section—without any prioritization of concern. Excerpts from Xcel's proposal are shown in *italics* to provide context to our reply or comments. The red text highlighted in yellow states the CFERS-requested action in the EIS. Following this is a short description and commentary on why this is important to be addressed.

Section 2.4, p. 20, Transmission Line Rights-of-Way

The EIS should review/evaluate/consider/compare: Applicant's proposal and impacts of use of existing rights of way of ALL infrastructures.

CFERS, LLC agrees with the stated definition that reduced easements are achievable when the siting of the transmission lines are paralleling infrastructure rights of way. This fact is essential in reducing impact to the environment and landowners adjacent to the selected route. If additional easements are required when paralleling existing rights of way, the incremental impacts of these additional easements must be considered.

Section 4.2.6, p. 62, MISO's Summary of Need for the Project

The EIS should review/evaluate/consider/compare Applicant's proposal and impacts and distinctions

Between Xcel's claimed need, based on MISO "approval" and need for the project for Minnesota.
"….MISO sees strong flows West to East across Minnesota to Wisconsin and…..to deliver that energy to Load Centers in MISO. The Minnesota to Wisconsin projects relieves constraints in the Twin Cities metro due to high renewable flow towards and past the Twin Cities load center."

CFERS, LLC has STRONG reservations about sacrificing our environmental rights and safety expressly for sending energy through Minnesota for the benefit of out-of-state clients for Xcel Energy (a/k/a NSP Company) and their MISO partners. CFERS will offer a robust defense of said rights through the regulatory process to ensure our concerns, Minnesota's, and the public interests are addressed and accommodated in the project plans.

The EIS should review/evaluate/consider/compare the "No-Build Alternative." The Commission's consideration of the "No-Build Alternative" is an important aspect of reviewing the need for the project. As above, this "need" appears to be a claim based on Xcel and the Commission's failure to address proper siting of projects such that promotion of these extreme "solutions" would not follow. Consideration of any "need" must include the CAUSE of the stated need.

Section 4.3.1, p. 69, Xcel Energy's Reliability Need Analysis

The EIS should review/evaluate/consider/compare the need of the project in light of the public interest and the reasonableness of that need as a basis for this proposed project.

"When there is high wind generation available without peak demand to consume that energy, considerable stress is placed on certain elements of the transmission system".

CFERS, LLC responds that Xcel has apparently not designed their transmission system to manage this eventuality—which is regrettable, but does NOT provide justification for their Certificate of Need. The Public Utilities Commission has also not taken this eventuality into account, and this is a principal aspect of its regulatory charge. If indeed the existing flows of power create these situations, then it should be the responsibility of Xcel Energy to develop plans that put the CONSEQUENCES of such failed planning squarely on the "shoulders" of those requesting and/or issuing the permits, Xcel's shareholders, and their customers--those accountable--not at the expense or socio-economic burden of other MN landowners and/or citizens.

Section 6.1, p. 109-111, Summary of Route Selection Process and State Routing Criteria

The EIS should review/evaluate/consider/compare the route selection process and criteria.

"Minn. Stat. 216E.03, subd. 7(a) provides that the Commission's route permit determinations "must be guided by the state's goals to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and ensure the state's electric energy security through efficient, cost-effective power supply and electric transmission infrastructure." Subdivision 7(e) of the same section requires the Commission to "make specific filings that it has considered locating a route for a

high-voltage transmission line on an existing high-voltage transmission route and the use of parallel existing highway right of way and, to the extent those are not used for the route, the Commission must state the reasons." In addition to the statutory criteria noted above, Minn. Stat. 216E.03, subd. 7(b), as amended, and Minn. R. 7850.4100 provide factors the Commission will consider in determining whether to issue a route permit for a high voltage transmission line. These factors are: A. …….Q."

CFERS, LLC is particularly grateful to see salient factors are to be part of the decision-making process toward selection of a route, if a need has been clearly defined and accepted. I will comment on stated factors by their alpha identity on pages 111-112, specifically A, B, C, E, F, G, H, J, L, M, N, O and P—but again reserve the right to comment at a future date on other alpha items not replied to herein. I will reference this section and "factors" in other Sections of CFERS, LLC reply—as appropriate.

The EIS must address the route selection process and routing criteria in light of impacts and burdens on those previously affected by prior proposed projects, prior constructed projects, and future anticipated interrelated projects and of state case law governing siting of transmission. A "Ready-Fire-Aim" approach to Transmission Line siting is NOT an acceptable methodology.

Section 7.3.1, p. 154 Proximity to Residences

The EIS should review/evaluate/consider/compare the impacts to residences and related factors discussed below.

CFERS, LLC has members who have residences within 200 feet of the proposed centerline of Route Options 2S or 2N. Of equal importance, many members are likely to suffer (from either the 2S or 2N routes) from a number of adverse conditions that will exist on their properties caused by the construction and/or operation of this transmission line including: threats to their health, devaluation of property values, negative impacts to their farming practices, costly improvements to building grounding, destruction of drain tiles across their properties (some tiling systems are shared by multiple landowners), harm to shallow-water wells from construction of 8-12 foot diameter footings that are described to be 25-60 foot deep, destruction of habitat that currently supports flora, fauna and enjoyable aspects of country living, and other details that will be commented on throughout this response by CFERS, LLC. The EIS MUST consider the impact of all of these critical factors.

Section 7.3.2.2, p. 159 Electric Fields

The EIS should review/evaluate/consider/compare the categories of implanted medical devices in people who reside, work, or may visit portions of the transmission line sites.

"The Commission, however, has imposed a maximum electric field limit of 8 kV/m measured at one meter above the ground".

Electric and magnetic fields associated with 345 KV transmission lines have the potential for threats to human health. Notably, cardiac pacemakers may experience undesirable operation when exposed to such effects noted above. Noting that the imposed maximum electric field limit of 8 kV/m is measured at one meter above ground, one can predict a higher value would be registered at 5-6 feet above the

ground. CFERS, LLC notes that the Commission's set-limit was primarily directed toward serious hazards from shocks—hence the 1 meter from ground specification. There are real medical concerns for personnel with implanted pacemakers, however, that warrants further restrictions and precautions on transmission line siting. Some of our landowners either have pacemakers now or can expect to need one based on their family medical history. The acceptable limits of Electric Fields are inadequate to protect landowners from threats to their health and safety and those "living" in and around THEIR property. It is totally unacceptable to CFERS, LLC to allow transmission siting to create potentially unhealthy conditions ANYWHERE on a landowners or CFERS, LLC members properties.

Section 7.3.2.3, p. 163 Magnetic Fields

The EIS should review/evaluate/consider/compare the impact of exposing landowners and citizens to magnetic fields significantly higher than existing backgrounds.

"Page 166, applicant calculates a maximum allowable within ROW of 246 mG for a Single Pole, Davit Arm, 345 kV Single Circuit/Single Pole, Tangent, 345 kV Single Circuit on the Wilmarth – North Rochester 345 kV / Line 964 345 kV. Various distances from centerline ROW shows a calculated reduction in magnetic fields. On page 172 applicant states "Most researchers concluded that there is insufficient evidence to prove an association between EMF and health effects; however, many of them also concluded that there is insufficient evidence to prove that EMF exposure is safe."

It is CFERS, LLC position that the Applicant must consider the impact of exposing landowners and citizens to magnetic fields significantly higher than existing backgrounds—even though there are various perspectives on this topic. Regarding the concerns voiced about pacemakers and electric fields, there may be an additional concern about them or other implanted medical devices and magnetic field EMF. We request that any siting proposal be required to document pre- and post-build values of electric and magnetic fields (post-build values to be documented at average and maximum load conditions and made public in the interest of transparency).

Section 7.3.2.5, p. 173 Farming Operations, Vehicle Use, and Metal Buildings Near Power Lines

The EIS should review/evaluate/consider/compare required grounding methods, costs, and accountability for elimination and/or mitigation of adverse conditions caused by Applicant's Project.

"Therefore, the induced charge on vehicles will normally be continually flowing to ground unless they have unusually old tires or are parked on dry rock, plastic, or other surfaces that insulate them from the ground. The Applicant can provide additional vehicle-specific methods for reducing the risk of nuisance shocks in vehicles"

CFERS, LLC STRONGLY recommends the full review of potential adverse effects of induced charges caused by this transmission line and its remediation. There are many types of vehicles, farm buildings, fencing, metal structures (et al) that could provide adverse effects to landowners, farmers, children, farm animals and pets, visitors, delivery/service personnel etc. caused by a 345 kV power line operating on or nearby their property. On page 173, "*Any person with questions about a new or existing metal*

structure can contact the Applicant for further information about proper grounding requirements". It seems to CFERS, LLC that the Applicant expects the affected landowner/citizen to fix a problem created by the Applicant if the proposal moves forward. Accordingly, the EIS must COMPREHENSIVELY identify and address conditions, costs, and accountabilities on rural properties whether on a farm, residence, building or structure in a more thorough and caring demeanor.

Section 7.3.3.1, p. 176 Noise Related To Construction

The EIS should review/evaluate/consider/compare the potential for noise pollution and adverse impacts to humans, wildlife, farm animals, children, and the rural environment during the construction phase of a transmission line project.

For greenfield sites, one could predict extraordinary sound pressure levels for equipment used to obliterate a 150 foot wide clearance for a 345 kV line that would definitely pose great auditory risks to any person or creature in the immediate area. In addition, CFERS LLC's members value and cherish our rural environment—typically very quiet and calm, with few loud noises—and those are intermittent and infrequent. The construction activities necessary to build the proposed transmission line will cause an immediate deterioration of our environment for a significant period of time—none of which is discussed or specified in applicants submittal. CFERS, LLC insists that the EIS clearly identify and discuss the duration and magnitude(s) of these incursions to our Environmental Rights & Safety--and prevention, mitigation or elimination of such extreme noise levels and disturbances.

Section 7.3.4, p. 180 Aesthetics

The EIS should review/evaluate/consider/compare the aesthetics and related factors of each route for existing landowners and citizens in the project area within a distance of 3 miles from center of ROW.

*"The majority of the Project Study Area contains existing utility infrastructure (see **Map 6-1**), including* electric transmission and distribution lines, which visually altered the landscape upon initial *establishment. The proposed overhead transmission lines will be permanently visible to observers in the area surrounding the project. To minimize aesthetic impacts, the Applicant has proposed Route Options that generally follow existing rights-of-way, where practicable."*

In and around the properties of CFERS, LLC members the tallest transmission lines one sees today are no more than 90 feet, based on data provided on p. 181 of the applicant's proposal. The 345 kV lines being proposed will require structures ~150 feet in height and be significantly more noticeable from longer distances than existing 69 kV and 115 kV lines due to its structure. If a greenfield route is selected--by definition there are no existing lines there today—and the resulting change in rural aesthetics would be dramatic and objectionable, particularly where proposed routes are located near ridges or highpoints.

The applicant's statement on page 180, *"Rural buildings along the Proposed Routes, both inhabited and uninhabited, are typically buffered by treed areas"* is misleading at best. Most trees in our CFERS, LLC members area are not over 150 ft. tall and therefore poles and lines WILL BE forever in view from most viewing angles whether an observer is indoors looking out a door or window, or outdoors. Such a

dramatic change to our rural environment will undoubtedly diminish and/or devalue the property in and around the project area. The EIS must include the aesthetics factors for existing landowners and citizens in the project area within several miles due to the "monstrosity" of the structures and line size for a 345 kV transmission line, as clearly demonstrated by similar infrastructure already built along MN Hwy 52 near Pine Island and Cannon Falls MN. In addition, a greenfield approach will decimate local forests and windbreaks with a 150 foot wide path in its siting route. Those forests and windbreaks provide habitat for a larger variety of animals and birds than shown in the applicants proposal—and to the small family farms in our rural area is a significant loss to their small acreage and local fauna and flora. Failure to consider the full impact of these considerations may demonstrate a lack of consideration for rural farmers and THEIR (the landowners) perspective of beauty and scenic importance. CFERS, LLC suggests a 3 mile radius to assess visual effects.

Section 7.3.4.1 p. 183 Aesthetics: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare EACH property in a proposed route for removal of trees and alternatives to avoid same.

"The Applicant will mitigate aesthetic impacts by avoiding removal of trees where possible…….and by using existing infrastructure and roadway or transmission facility rights-of-way to the maximum practicable extent".

CFERS, LLC is encouraged by this affirmation—but will suggest a "trust, but verify" approach to their "commitment". The best way to exemplify their stated "promise" is to NOT build the project as defined or to document EACH property in proposed routes what square footage and height of trees are being proposed for removal and list options to avoid such tree removal. Failure to recognize the specific plans and options for each property along the route will bring unnecessary harm to the local environment affecting aesthetics, flora and fauna even beyond the landowner's vista.

Section 7.3.5.1, p. 186 Socioeconomics: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the specific factors for each resident having property in and along the route of the Applicant's Project—whether sited there or on adjacent land.

Applicant *states "The construction and operation of the Project is expected to have minimal long-term impacts on local (county and municipal) economies due to the relatively short-term time frame of construction (2-3 years).*

Local farmers and land owners WILL experience significant economic losses during and after the project construction. 150 foot wide ROW for a 345 kV transmission line translates into lost farm acreage and can diminish output and/or create a difficult economic environment for landowners and farmers. Damage potential to farm fields includes soil compaction, crushed and broken drain tiles—some of which may be collaboratively owned by multiple landowners that acquired such rights when larger properties were divided and sold—and some may be clay tiles, intrusion and disruption of farming techniques and methodologies. 95% of all farms in Rice and Goodhue counties are "family farms"

according to Goodhue County Ag Census Data for 2022. (Reference https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Minnesota/cp27049.pdf) From that same USDA report, 65% of all Goodhue County Farms are less than 180 Acres and 48% of all Goodhue County farms have annual crop sales of less than $50,000. Rice County statistics are even lower for the same reporting period: 75% of Rice County farms are less than 180 Acres and 61% of Rice County farms have annual crop sales of less than $50,000. (Reference https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Minnesota/cp27131.pdf) Devaluation of properties due to close proximity of transmission lines typically ranges from 10-30%, but has approached 45% according to The Wall Street Journal. (Reference https://www.wsj.com/articles/the-electrifying-factor-affecting-your-propertys-value-1534343506) Neither of these factors is identified, quantified, weighed or addressed in Applicants proposal but MUST be in the EIS for this project. Family farms are under tremendous pressures to remain in existence and to enable continued family ownership to future generations. A transmission line across or near their property is NOT a helpful situation from any perspective. Two of our CFERS, LLC members each have a homesteaded property of 6-7 acres—one on route 2N, the other on route 2S.

"No adverse socioeconomic impacts are anticipated and therefore, no mitigation measures are proposed."

This statement by the Applicant is troubling as the Applicant's Project will affect the livelihoods and economic well-being of rural residents, farmers and landowners. On a related note, during the 5/23/23 public meeting at the Zumbrota Fairgrounds, one of our local CFERS LLC members was present with me when a representative from Xcel responded to our concern about damage to drain tiles. He stated that they are so committed to getting land restoration properly done that they were STILL working on repairs to a farm field drain tile issue near Mankato after 10 years! This individual apparently did not fully comprehend the impact of his "assurances"—still going after 10 years? Clearly, the EIS for this project MUST address predicted impacts to incomes, property values, and timely restoration for EACH property. CFERS, LLC suggests penalty clauses for missed deadlines, commitments and promised performance criteria so landowners can rely on Applicants assertions.

Section 7.3.8.5, pp. 197-198 Recreation: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare ALL the potential impacts from construction through full operation.

Applicant states *"Impacts to private recreational facilities will be avoided or mitigated through landowner agreements where feasible".*

Once again we see wording that is problematic "…where feasible". Feasible to whom? The generalization in the proposal is inadequate and must be quantified, defined, and addressed by the Applicant in the EIS. The 150 foot-wide clear cut through wooded forests, windbreaks and rural areas necessitated by a 345 kV transmission line will destroy habitat for songbirds, mourning doves, squirrels, cardinals, orioles, eagles, raptors, owls, woodpeckers, wood ducks to name a few that were NOT listed in the proposal. Butterflies, hummingbirds and many other creatures rely on the habitat that has been

around our rural areas for many years without the dramatic adverse changes caused by this transmission line project. The absence of detail regarding how this will be assessed, planned for and accomplished is deafening! How will the current status quo be quantified and how will it be judged as "successful" after the project is built? And within what timeframe? "Private recreational facilities" include the project area, residences, farms, adjoining property owners, etc. Again, it is essential that the EIS provide much more detail about how the environmental rights of landowners, citizens, and adjacent properties will be quantified, monitored and satisfied during construction and after the transmission line is in full operation. CFERS, LLC recommends surveys on each property for all potential routes, both pre-construction and follow-up after full-construction and operation for at least 3 years.

Section 7.3.9.3, p. 200 Water and Wastewater Services

"In rural areas, residents typically use private septic systems and wells."

Section 7.6.4.5.1, pp. 273-274 Groundwater: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the water table, wells and wastewater services for EACH property and adjoining property on any proposed route.

The Applicant states *"The construction and operation of the transmission line has the potential to impact groundwater through temporary construction-related impacts and/or long-term impacts, but is not anticipated to adversely impact groundwater resources on any route option, alternative segment, or connector segment. Foundation materials would range from 25 feet to 60 feet deep and wells in the area range from 100 feet to 1,115 feet deep. As depth of wells will be greater than structure foundations, the Project should not impact groundwater resources."*

CFERS, LLC is surprised to see that the Applicant has no information in their proposal dealing with wells around segment 2S or 2N. This is puzzling, as we understand there are many shallow-water wells in our area. One of our members has a 25 foot deep well—and one of the route options is less than 200 feet from his residence! Foundations of 8-12 foot diameter borings with re-bar and concrete extending down to 60 feet WILL likely affect this members water supply—and also could impact many additional properties around the defined project areas. Applicant has not provided any details about how they view THEIR responsibilities to our rural citizens whose shallow wells would be impacted, preventive measures taken to avoid or mitigate and/or resolve this project whether they are a landowner where the transmission line is sited or whether they are affected by the consequences of this project even though their property may not be on the planned route. Once again, the EIS MUST have specific details documented for all rural wells that are possibly impacted by this project to address and assure satisfaction and protect residences and farms not only in the project area, but also adjacent to the routes contemplated. It is insufficient to rely on electronic databases for well locations and salient details due to the age of many properties and their water systems. CFERS, LLC recommends surveys on each property for all potential routes, both pre-construction and follow-up after full-construction and operation for at least 3 years.

Section 7.4.1, pp. 217-218 Agriculture

The EIS should review/evaluate/consider/compare the specific economic health of landowners, farmers, and adjacent property values along each proposed route.

The Applicant reports 2017 Agricultural Statistics of Counties Crossed by the Proposed Routes in Table 7-33 on page 218. This high-level data does not provide the necessary CONTEXT to portray accurate and current farm data. "Average" data sets have the remarkable INABILITY to understand the size and outputs of farms and properties directly affected by Applicant's Project. CFERS, LLC is wondering why a 2017 dataset was selected for this proposal. CFERS, LLC was quickly able to query and get a much more recent data set from the USDA and which provided a more analytical approach than "average" data. We only selected the data for Goodhue and Rice Counties, but believe similar datasets are available for other counties affected by potential routes.

https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Minnesota/cp27049.pdf is the link for Goodhue County.

https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Minnesota/cp27131.pdf is the link for Rice County.

For ease of review, I have copied our comments from **Section 7.3.5.1, p. 186 Socioeconomics: Avoidance and Mitigation of Potential Impacts** which apply to **Section 7.4.1 Agriculture** as well.

Local farmers and land owners WILL experience significant economic losses during and after the project construction. 150 foot wide ROW for a 345 kV transmission line translates into lost farm acreage and can diminish output and/or create a difficult economic environment for landowners and farmers. Damage potential to farm fields includes soil compaction, crushed and broken drain tiles—some of which may be collaboratively owned by multiple landowners that acquired such rights when larger properties were divided and sold—and some may be clay tiles, intrusion and disruption of farming techniques and methodologies. 95% of all farms in Rice and Goodhue counties are "family farms" according to Goodhue County Ag Census Data for 2022. From that same USDA report, 65% of all Goodhue County Farms are less than 180 Acres and 48% of all Goodhue County farms have annual crop sales of less than $50,000. Rice County statistics are even lower for the same reporting period: 75% of Rice County farms are less than 180 Acres and 61% of Rice County farms have annual crop sales of less than $50,000. Devaluation of properties due to close proximity of transmission lines typically ranges from 10-30%, but has approached 45% according to The Wall Street Journal. Neither of these factors is identified, quantified, weighed or addressed in Applicants proposal but MUST be in the EIS for this project. Family farms are under tremendous pressures to remain in existence and to enable continued family ownership to future generations. A transmission line across or near their property is NOT a helpful situation from any perspective. Two of our CFERS, LLC members each have a homesteaded property of 6-7 acres—one on route 2N, the other on route 2S.

From the aforementioned data, CFERS LLC notes these two counties experienced a 4 % loss of farms in Goodhue County and 11 % loss of farms in Rice County. This is a potential indicator of how difficult it is to conduct farming in the current environment. 35-42 % of farms in the two counties are less than 50 acres, respectively. (See lower right of first page of county profiles for Goodhue and Rice counties, referenced above in this section). Siting transmission lines thru small farmstead is an economic threat to those who are operating small businesses and least able to withstand a 150 foot-wide ROW thru their operations. During the construction phase, farming operations will be compromised and adversely affect their peace of mind and activities. Compaction and hidden and latent damage to drain tile systems is likely to occur and the scope of the damage not be fully understood until months and years later. Construction activities will undoubtedly affect livestock and farm animals and such impacts may be difficult to quantify. Beyond the construction phases other issues of building grounding, electric shocks, magnetic emf et al will potentially remain ongoing. Furthermore, if the farmstead does fail, the property devaluation caused by the transmission line can be expected to be 10-30%--perhaps up to 45% according to some reports—and the sale value of the property reduced accordingly. The farmer takes the risks that are forced upon him/her without suitable compensation. Tax payments to local governments, schools, or associations do NOTHING to alleviate the condition of the landowner beyond a modest eminent domain stipend—which never seems to be made public, but should be for transparency. The EIS needs to contain a defined plan to measure and document factors reflecting the status quo and post-project actual comparative data for agricultural metrics.

Section 7.4.2.1 p. 219 Forestry: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the specific amounts of tree removal and vegetation clearing, along with alternatives to avoid or mitigate said actions, for each property on any proposed route in Applicant's Project.

Applicant states *"Impacts on forested areas within the Proposed Routes would be reduced by minimizing the tree clearing to the extent feasible; tall-growing vegetation within the ROW would be cleared."*

CFERS LLC notes the selection of verbiage. "…would be reduced" and "would be cleared". CFERS, LLC recommends the wording by changed to "WILL BE REDUCED" and "WILL BE CLEARED" to provide a more accurate statement. Also "tall-growing" is a very subjective non-measure. Also, by what methods will it be "cleared"—by mechanical demolition, chemicals, fire or??? AND what will be done with the debris field that may potentially be strewn beyond the 150 ROW? The EIS needs to quantify Applicant's physical measurement of "tall-growing", e.g. any vegetation over "x-feet" in height and other specific methods to achieve their end-result, plus who has the authority to approve such methods for each specific property or to negotiate for better mutual alternatives.

Section 7.6.1.1.1. P.242 Emissions Related to Construction

The EIS should review/evaluate/consider/compare actions and plans to AVOID dust and other annoyances.

Applicant states "If construction activities generate problematic dust levels, the Applicant may employ construction-related practices to control fugitive dust…and covering open-bodied haul trucks."

MN State law REQUIRES covering all loads per state statute, regardless of dust level. Please refer to https://dps.mn.gov/divisions/msp/commercial-vehicles/Documents/Pamphlets/2012%20Load%20Securement.pdf, CFERS; LLC insists the EIS contain specific language to prevent any open loads of concerned materials shown in the aforementioned DPS link. For example, rather than wait for one or more complaints to drive corrective action, would it not be better to be "pro-active" and taken preventive action(s) to avoid such complaints?

Section 7.6.4.5.1. P.274 Groundwater: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the depth and status of ALL wells with a mile of EACH property along any proposed route.

Applicant states *"Foundation materials would range from 25 feet to 60 feet deep, and wells in the area range from 100 feet to 1,115 feet deep."*

CFERS, LLC requests that the Applicant be required to document the each landowner's specific well(s) data along ALL proposed routes. We know of at least one CFERS member who reports they have a shallow well of 25 foot depth AND they are currently less than 200 feet from the ROW for one of the proposed Segment 2 routes. I tried the MN Well Index on the internet, but did not see any info for his property or another neighbor, so relying on that archive appears to be questionable for planning a project like this. A detailed survey of each property is the only way to acquire a factual understanding. CFERS, LLC recommends that each farmstead and rural property within a mile of the planned route should be personally surveyed by the Applicant and data recorded in the EIS before choosing a transmission line route.

CFERS LLC has also heard that Karst structures are a distinct possibility in Segment 2 or other segments of the project. This should also be analyzed for each siting property.

Section 7.6.5.1 p.288 Flora: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the amount of each property's vegetation that is proposed to be cleared and what alternatives are available to avoid or reduce such destruction for each property on any proposed route.

Applicant, Xcel Energy/NSP Company, states *"Impacts to vegetation within the Proposed Routes will occur where clearing of trees and tall vegetation within the right-of-way is required for the construction, maintenance, and safe operation of the transmission line. Impacts to low growing vegetation will be temporary as low growing vegetation will be allowed to grow back following construction. Impacts to tall vegetation within the right-of-way will be permanent as the right-of-way will be mowed and maintained as needed following construction. Permanent removal of vegetation will occur in areas where new structures are proposed."*

CFERS LLC has several concerns with Applicant's statements that require additional clarification, definition, and specific plans to address in the EIS including: "low growing vegetation will be allowed to grow back following construction". Rather than a passive approach, why not take this opportunity to DEDICATE such areas of low growing vegetation to specific species of perennials that will be attractive to bees, other pollinators, butterflies, or similar insects and birds? In addition, it is appropriate to define and document what height range is considered "low growing vegetation". Remove the subjectivity of Applicants verse and make it a standard practice for databased specifications. PLEASE require this level of discussion in the EIS for this topic and wherever else it CAN be conducted. Instead of "allowing it to grow back", CFERS LLC would like to see an affirmative approach of what should be seeded/planted consistent with safe operation. One final question, the statement "Impacts to tall vegetation within the right-of-way will be permanent as the right-of-way will be mowed and maintained as needed following construction" is potentially inconsistent with low growing vegetation being allowed to grow back. What is specified as "low vegetation", what height is it limited to, and does mowing it result in its demise? The EIS definitely needs to address the specific details of Applicants generalizations.

Section 7.6.6.1 p.289-292 Fauna: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare ALL types of flora and fauna by survey of each property along any proposed route—both in and adjacent to the project sites.

CFERS, LLC is particularly concerned about the greenfield routes the Applicant is considering with the high probability of significant destruction of our rural peaceful environment. This is one of the reasons CFERS, LLC was founded two decades ago. Applicant does not do justice in Table 7-69 to the long list of fauna and birds that currently thrive in the project area. Mourning doves, butterflies of several varieties, owls—barred, hoot, screech, barn, short-eared, long-eared, great horned, and more, various types of orioles, turkey vultures, American Bald eagles, migrating birds—snipes, ducks, geese of several types, cardinals, meadow larks, and many more. ALL of them are important aspects of our rural life—they are a critical part of our eco-system that rural citizen's value and do not want to see projects that destroy their habitat. Reduction of habitat results in reduction of fauna and quantity of creatures that can be supported by the reduced habitat. CFERS, LLC strongly objects to "greenfield projects" due to the clear-cutting of forests, trees, windbreaks and other vegetation. Put these transmission lines along state highways and county roads where the rights-of-way have already been established and damage to the eco-system has already been inflicted. We insist the EIS specifically require Applicant to show all non-greenfield alternative routes that were considered and to show factors, costs, and other justifications for proposing greenfield segments. Project acceptance may be easier to embrace by proceeding on existing routes along state and county paved roadways and to avoid greenfield routes when other options already exist and in compliance with factors shown by "alpha" in **Section 6.1, p. 109-111, Summary of Route Selection Process and State Routing Criteria.**

Applicant states *"Potential collisions with the transmission line pose a risk of injury or death to bird species. These impacts often involve waterfowl. Larger birds, especially raptors, are at additional risk of being electrocuted if their large wingspans contact parallel conductors as they land or take off from a tower."*

CFERS, LLC agrees with this fact and comments that this is one good reason not to construct a transmission line in greenfield rural areas through windbreaks, wooded lots, tree lines and areas of vegetation where raptors typically nest, hunt for food, and patrol the area. Migratory waterfowl also deserve to be considered. It is well-known that Canadian geese and a variety of ducks migrate through the proposed routes in Segment 2. The EIS needs to address specifically how the project routes avoid and prevent interaction with raptors and migratory fowl and why a chosen route is better or worse than other options.

Section 7.7 p.292-293 Rare and Unique Resources

The EIS should review/evaluate/consider/compare EACH property along all proposed routes for the presence of Bald and Golden Eagles whether nesting or regularly visiting.

Applicant states "*Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act of 1940. Bird species and their nests are, in general, protected by the Migratory Bird Treaty Act of 1918.*"

American Bald Eagles are regularly seen nesting and flying across the project areas. These magnificent birds, and symbol of our nation, are being threatened by the 345 kV lines with 150 foot towers. Migratory birds also run the risk of being injured or killed by the 150+ foot towers and high voltage lines. Specific to Segment 2 routes, these birds are in jeopardy from this project routing. The EIS must specify and discuss detailed measures to avoid as well as regularly document and report any casualties caused by this project from its construction thru lifetime operation.

Section 7.8.3.5 p.319 Soils: Avoidance and Mitigation of Potential Impacts

The EIS should review/evaluate/consider/compare the field tile and drainage systems along EACH proposed route for age of tile, type of tile, spacing of lines, co-ownership with shared properties, and other related factors that should be known to understand how the Applicant intends to prevent damage to each farm property through responsible siting, maintenance and reporting.

Applicant says NOTHING about consequences of compaction of soils during construction phases that also correlate to damage to drain tile and drain fields. Many of segment 2 properties along either route have drain tiles and drain fields—and in some cases are co-owned by multiple property owners as a result of dividing sections of farmland into smaller parcels. The older drain tiles are likely to be clay tiles which are more likely to fracture/break/crush/etc. becoming non-functional when construction equipment rolls across the property or when boring/digging of foundations. Discovery of such damage is likely not to be discoverable until months and years later depending on precipitation and other weather conditions. The EIS needs to specifically describe the methods to prevent drain tile damage from construction through the life of the project (yes--including maintenance, inspection, and repair activities) and detail the damage recovery process when drain tiles and drain fields are harmed by this project. I again reference an earlier discussion with a representative from Xcel at the Zumbrota Fairgrounds open house when said representative applauded the fact that Xcel was taking over 10 years to resolve a drain tile damage situation in the Mankato area resulting from a project. (See: **Section 7.3.5.1, p. 186 Socioeconomics: Avoidance and Mitigation of Potential Impacts**)

Section 7.8.3.5 p.320 Unavoidable Impacts

The EIS should review/evaluate/consider/compare ALL unavoidable impacts to any property that is on any of the proposed routes, whether on or adjacent to a 3-mile distance from the centerline of ROW.

Applicant states *"Unavoidable construction related Project impacts that would resolve after construction is complete:…….Visual disturbance to nearby residents and recreationalists."*

Applicants view that visual disturbance to nearby residents and recreationalists would resolve itself after construction is completed is misleading to CFERS, LLC members. Though the construction equipment will be gone, the beautiful vistas or our rural environment will be forever changed and the presence of the 150 foot tall towers for the 345 kV line will be a testimonial to a public utility being allowed to run rough-shod through rural landowners for clients outside of Minnesota, devaluation of their property, disruption of their farming and related activities, and loss of their control for activities that may later be considered—but potentially no longer allowed if the project is built as a "greenfield" on their property.

Applicant states *"Unavoidable operation related Project impacts that would last throughout the life of the Project would include the following:……."*

CFERS, LLC again notes that Applicant makes no mention about loss of control of one's property where the transmission line is constructed and the 150 ROW. The EIS should require Applicant to specify what activities will no longer be allowed on the landowners' properties in and around the ROW throughout all phases of the construction and project operational life and the financial compensation to the landowner for that loss of "freedom to farm" or equivalent. CFERS, LLC recommends these arrangements be a matter of public record to communicate the level of compensation in exchange for their loss of control.

CFERS, LLC Conclusions & Recommendations on Alternatives

Noting the aforementioned comments by specific section and page numbers that CFERS, LLC has offered regarding MPUC Docket Nos E002/CN-22-532 and E002/TL-23-157 Submitted by Northern States Power Company dated April 2, 2024 we have herein documented our Conclusions & Recommendations

The impacts to our rural environments and its residents create dramatic issues, socioeconomic adverse impacts to farmers and landowners across the proposed routes, and significant property devaluations to a class of individuals who can least afford the consequences of siting this transmission line in the route options proposed by the Applicant. Asking small farmers and landowners to bear the brunt of a set of consequences from a series of 345 kV high voltage transmission lines for a giant utility that will deliver electrical power on it to out of state clients does not seem to be an "appropriate" NEED . Looking at the statistical population data from the 2022 USDA County Profiles for Rice and Goodhue counties—instead of accepting the Applicant's "average" 2017 data in their proposal, one sees a more telling story that

48% of Goodhue County and 61% of Rice County farmers have annual farm incomes of <$50,000 and that for those two stated counties have farm sizes < 180 Acres for 65% (Goodhue) and 75% (Rice) farms. Both counties say 95% of their farms are "family farms". With this backdrop, the Applicant should re-evaluate their transmission line siting proposals and include newly identified Alternatives. There are additional justifications and recent legislative changes that make sense for the Applicant to call a "Time-Out" and reconsider the options presented below, as well as other options that may have been made feasible with new legislation. When proceeding, ALL such OPTIONS should be addressed in the EIS.

ALTERNATIVE OPTION A: MN STATE HIGHWAY #14 CORRIDOR

As noted in a June 12, 2024 article in "Canary Media" by Jeff St. John entitled "Minnesota takes rare step to allow power lines alongside highways" the State of Minnesota has now removed the prohibition to site power lines in the rights of way established for MN highways in an omnibus transportation bill. (https://www.canarymedia.com/articles/transmission/minnesota-transmission-grid-power-lines-highway) Given that encouragement, it only makes common sense for the Applicant to fully explore the Mankato to Kasson/Byron corridor along MN Hwy #14 for the 345 kV transmission line it seeks. The distance from North Mankato to the Byron Substation is ~76 miles. The wide expanse of the land cleared for this beautiful East-West highway provides a unique opportunity as a viable option to the two routes proposed in the Applicant's Application.

In addition, the Hwy 14 Route from Mankato to Kasson/Byron already has economic incentives in that it should dramatically reduce demolition costs/schedules, avoid most potential objections raised by residents and landowners now responding to the Applicant's plans and options, share at least 50% of the ROW required for the 150 foot wide clearance under the transmission line, dramatically reduce impacts to flora and fauna, remove most issues of close proximity to residences and other sensitive properties, and significantly remove the potential for soil compaction and damage to drain tiles/fields.

The distance from North Mankato to Kasson is ~71 miles. There is already a substation in Kasson, MN as shown by the Electric Transmission Lines and Substations Map from the MN Dept. of Commerce. (https://apps.commerce.state.mn.us/eera/web/project-file?legacyPath=/opt/documents/ElecTran08.pdf.)

Essentially, the prep work for much of the siting considerations has already been achieved in order to put in the highway infrastructure. CFERS, LLC is aware that there ARE similar and other unique details that must be investigated here, but placing this particular project on hold pending assessment of the Hwy 14 corridor alternative makes perfect sense. It is conceivable that even with additional planning, the total time to install could very well be significantly less expensive and faster. The funds spent by the Applicant on land easements, private negotiations and legal costs for condemnation/eminent domain will be dramatically reduced.

There is currently a 345 kV line (shown in red) that runs from the Byron substation area northward along Olmsted County 5 to the southern edge of Pine Island. The Byron transmission line appears to be of the older H-style tower structure. There could be opportunities to upgrade that line with newer towers and double-circuited lines. The Kasson MN substation appears to be a few miles west of the previously mentioned Byron transmission line. That substation appears to feed a 69 kV line (shown in grey) to Pine Island arriving there not far from the 345 kV Byron line. CFERS, LLC is unfamiliar with those lines, noting that the Dept. of Commerce map shown here is dated 2008. We would expect the Applicant and/or the MPUC has sufficient technical resources to properly confirm the latest specs—as well as to review what the costs and issues would be to upgrade one or both of those transmission lines to meet the objectives of the current proposal by the Applicant.

CFERS, LLC recommends that the EIS include the MN Hwy #14 corridor alternative(s) in its project planning given the new direction offered by the Minnesota Legislature in the recent Omnibus Transportation Bill. CFERS, LLC sees this alternative as the best apparent siting solutions with respect to elimination or significant reduction in project costs, faster implementation, and significantly reduced impact to MN small farms, landowners and residents.

ALTERNATIVE OPTION B: MN STATE HIGHWAY #60 CORRIDOR

CFERS, LLC STRONGLY requests that if the MN State Highway #14 (Option A) is not selected, then the next plan to be considered would be the MN Highway #60 Corridor from Kenyon eastward WITH the limitation that the Applicant be required to maintain a 500 to 1000 foot setback from any existing residence or farm building. In order to achieve this reasonable accommodation, the line may have to be offset from following Hwy 60 from time to time, but we would anticipate that as soon as the residence or farm building setback is satisfied, that the transmission line would resume following Hwy 60. This option, like Option A, is consistent with the recent MN Legislature Omnibus Transportation Bill that removes the prohibition to place power or transmission lines in the ROW shared with MN State Highways. The added stipulation of 500 to 1000 foot setback from residences or farm buildings is to remove/reduce potential health, building grounding and property devaluation concerns created by a 345 kV transmission line. Additional considerations should be discussed and negotiated with landowners who may have other specific situations needing mitigation or elimination. CFERS, LLC requests that the EIS include the consideration for this alternative and address the specific siting parameters associated with Option B.

ALTERNATIVE OPTION C: NO BUILD!

CFERS, LLC realizes there are many complex issues connected to developing, constructing and operating a SAFE, RELIABLE, AND ENVIRONMENTALLY SOUND Transmission Line. That being said, one MUST have the Applicant fully define the "WHY" (is it necessary)—"WHAT" (is the need). It is insufficient to generalize or provide subjective "reasons" without DATA—and the RIGHT DATA! As most technical personnel realize, all data must be evaluated/analyzed in the context of how it was gathered, to what degree of accuracy, to use it to prevent and/or resolve problems and then to VALIDATE whether the results of the actions taken were successfully achieved or not after the solution was put in effect. The current Application for a Certificate of Need does not appear to contain that level of information. Since Minnesotans would be bearing the costs and pain and suffering of siting this project, they deserve to hear specific reasons why this transmission line should be built—particularly because the "end-customer(s)" appear to be residents of and in another state. Unless the Application and EIS clarify the specifics of the implied "Need", it is impossible to get behind this transmission line project--and then CFERS, LLC would STRONGLY recommend it not be approved nor permitted.

Respectfully submitted,

Michael W. Chase

President, CFERS, LLC

From: Mike Heselton
To: Davis, Richard (COMM)
Subject: Segment 2 345KV Transmission Project (PIN 1807250001)
Date: Wednesday, July 31, 2024 2:38:41 PM

I am F.H. Holding LLC's representative, and we have concerns about the Power Lines running through our property for the following reasons.

1. Our 72-acre parcel is designated for future single family residential housing development.
2. We are also concerned about the Hazardous Affects that these may cause harm to future residents while living near the 345KV line.
3. The power lines and pole easement will remove a large amount unusable property which we are planning on developing.
4. The properties to the East and West of our site are also Housing Development sites which the Power Line will affect considerably.

Mike Heselton
F.H. Holdings
680 24th St NW
Faribault, Mn 55021

From: Carrie Menk
To: Davis, Richard (COMM)
Subject: Comments for Mankato to Mississippi
Date: Thursday, August 1, 2024 4:09:18 PM
Attachments: Higinbotham Menk Comments Mankato Mississippi 08012024.pdf

I uploaded this online, but decided to email it directly to you also. Thank you!

Docket Number:E002/CN-22-532, TL-23-157

Best,

Carrie Menk
612-432-4470

Docket Number: E002/TL-23-157; E002/CN-22-532

Docket Type: Transmission Line
Docket Description: In the Matter of the Application for a Route Permit for the Mankato to Mississippi River 345-kV Transmission Project in Southern Minnesota
Document Type: Comments
Related to Proposed Route 2 South, Between Faribault and North Rochester

Comments From Resident and Property Owners:
The Higinbotham Family Limited Partnership
Carrie Higinbotham Menk (contact person – 612-432-4470, cshigin@yahoo.com)
Katherine Elizabeth Higinbotham (contact person – 651-315-3342, kitty@higinbotham.com)
John Philip Menk

Land in Consideration of These Comments:
T109 R19W Section 14 7 Section 15
Residence Addresses:
11301 E. 230th St., Kenyon, MN 55946
11049 E. 230th St., Kenyon, MN 55946

Related to Proposed Route 2 South, Between Faribault and North Rochester

Please accept the following comments regarding the proposed permit and Environmental Impact Statement (EIS) scoping and review:

We feel strongly that, to ensure all potential impacts are considered within the EIS, factors in the following list should be studied. It is not evident to us that these considerations are already in the plan. We are in the process of initiating a natural resources and natural heritage survey of our property and would like any and all results of that survey to be considered prior to drafting of the final EIS and permitting decisions. We hope that full consideration of new power sources and power storage technologies, as well as power conservation measures, also will be part of the EIS.

1) What are the results of the following alternatives to this proposed project, including a full comparison of benefit and cost to all parties impacted.
    a) Grid Enhancement in the Rochester Area
        i. Sensors
        ii. Advanced Controls
        iii. Dynamic Line Ratings
        iv. Topology Control Software
    b) Reconduction
    c) Replacing Old/Existing Lines with Carbon
    d) Creating Microgrids
    e) Battery Storage
    f) A combination of the aforementioned alternatives

2) What are the results of a proposed smaller voltage line that has fewer environmental, property value, safety and aesthetic impact, including a smaller voltage line that when combined with above alternatives. With what results, including a full comparison of benefit and cost to all parties impacted.

3) What has been done to study and what are the results of the study of the following environmental concerns:
    a. New surveys should be completed for all natural resources and natural heritage along the proposed routes. Many of the natural resources have not been surveyed in over 40 years as can see on the DNR mapping and feature tables where this data is publicly available. https://mce.dnr.state.mn.us/content/explore
    b. The follow should be studied in depth. The proposed route South 2 and the noted setbacks will in several areas, including some at our own property line, cross over the following resources:
        i. Rusty Patch Bumble Bee Areas
        ii. Calcareous Fens
        iii. Karst
        iv. Old Growth Stands
        v. Native Plant Communities including several notated as Imperiled (S2) and numerous notated as Vulnerable to Extirpation (S3).
        vi. Freshwater Emergent Wetlands, including shallow marsh, shrub wetland and mineral flats.

4) We would like a full review and notation of all proposed setbacks in detail. The current determination of between 500 ft or more and up to 2.5 miles around substations does not adequately identify the areas that will be affected and in what ways.

5) We feel a review of impact to health and wellness for both humans and livestock should be fully studied and peer-reviewed regarding estimated setback safety from a high-voltage power line. Historical projects with possible health hazards have almost always resulted in more significant damage than was estimated at the time of proposal. We are concerned that, historically, human and environmental impacts have been overlooked in the name of progress.

6) We feel an outside entity should make a clear and detailed cost evaluation on housing and property value be provided for each individual landowner in a measure of full transparency as community members continue to consider the project in full. Farmers and landowners have invested in their land for their future, and to create insecure housing and retirement is a considerable human impact. We are also concerned about the human and community impact of dissecting so many farms and homesteads with a high-voltage power line.

Thank you for your consideration,

Carrie and John Menk
Kitty Higinbotham
Higinbotham FLP

From:	eera.admin_no_reply@state.mn.us
To:	Davis, Richard (COMM)
Subject:	Public Comment re: Mankato to Mississippi River Transmission Project
Date:	Thursday, August 1, 2024 4:07:28 PM
Attachments:	Higinbotham Menk Comments Mankato Mississippi 08012024.pdf

Mankato to Mississippi River Transmission Project

Submitter Name: Carrie H Menk

Submitter Email: cshigin@yahoo.com

Submitter Telephone: (612) 432-4470

Comment:
Please find the attached comments:

Submit Date: 08/01/2024 09:06 PM

Docket Number: E002/TL-23-157; E002/CN-22-532

Docket Type: Transmission Line
Docket Description: In the Matter of the Application for a Route Permit for the Mankato to Mississippi River 345-kV Transmission Project in Southern Minnesota
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Thank you for your consideration,

Carrie and John Menk
Kitty Higinbotham
Higinbotham FLP

From:	Heine, Ellen L
To:	wisenberg18
Cc:	hollund; Davis, Richard (COMM); contact
Subject:	RE: Xcell energy power lines
Date:	Tuesday, July 16, 2024 3:56:42 PM
Attachments:	image001.png image002.png image003.png image004.png 20240715_WayneIsenberg_8x11P.pdf

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Thanks Wayne,

Here's a map with a legend and a little more detail.

In order to make sure you receive updates on the Project as it progresses I recommend that you sign up to the docket and get added to the Project mailing list. If you are signed up on the docket you will receive notice whenever anything gets filed about the project, and if you add yourself to the mailing list you'll get future mailings for public hearings.

Here's the information from the public notice on how to sign up:

> **Full Case Record.** See all documents filed in this matter via the Commission's website at mn.gov/puc/edockets, select *Go to eDockets*, enter the year and docket number 22-532 for the certificate of need or 23-157 for the route permit, and select *Search*.
>
> **Subscribe to the Docket.** To receive email notification when new documents are filed in this matter visit: https://www.edockets.state.mn.us/EFiling, select *Subscribe to Dockets*.
>
> **Project Mailing List.** Sign up to receive notices about project milestones and opportunities to participate or change your mailing preference. Email eservice.admin@state.mn.us or call 651-201-2246 with the docket number (22-532 or 23-157), your name, mailing address, and email address.
>
> **Department of Commerce Website:**
> https://eera.web.commerce.state.mn.us/web/project/15507

Ellen Heine
Xcel Energy
P: 612.330.6073 **C:** 651-247-0957
E: ellen.l.heine@xcelenergy.com

From: wisenberg18 <wisenberg18@outlook.com>
Sent: Tuesday, July 16, 2024 12:48 PM
To: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>
Cc: hollund <hollund@bevcomm.net>; Davis, Richard (COMM) <richard.davis@state.mn.us>; contact <contact@mmrtproject.com>
Subject: Re: Xcell energy power lines

Hi Ellen,

Yes this is the property that we own. If you can keep us updated on the plans thru, close around and anything that would pertain to us i really appreciate.

Thank you
Wayne

On Jul 16, 2024 at 12:15 PM, Heine, Ellen L <ellen.l.heine@xcelenergy.com> wrote:

Thanks Wayne, that's helpful. Is it this parcel (see red outline)? Our parcel data shows that as being owned by Westman Group, but it could be outdated.

Ellen Heine
Xcel Energy
P: 612.330.6073 **C:** 651-247-0957
E: ellen.l.heine@xcelenergy.com

From: wisenberg18 <wisenberg18@outlook.com>
Sent: Tuesday, July 16, 2024 11:50 AM
To: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>
Cc: hollund <hollund@bevcomm.net>; Davis, Richard (COMM) <richard.davis@state.mn.us>; contact <contact@mmrtproject.com>
Subject: Re: Xcell energy power lines

Hi Ellen,

I am sorry, the property is listed under MK Investment Properties. That may help you find a map for us. The Lat/Lng 44.19924, 93.83467 section 033.

Thank you
Wayne

On Jul 16, 2024 at 11:22 AM, Heine, Ellen L <ellen.l.heine@xcelenergy.com> wrote:

Hi Wayne,

I was going to have a map created that showed your property in relation to the proposed routes, but it looks like you may be outside of our study area as she wasn't able to find your name in the parcel data (or maybe the ownership isn't under your last name). I've included a couple of screenshots of the area around Madison Lake below. Could you let me know if this is the area you are interested in, or provide us with an address so we can make sure to include your property?

Thanks,

Ellen

Ellen Heine
Xcel Energy
P: 612.330.6073 **C:** 651-247-0957
E: ellen.l.heine@xcelenergy.com

From: Heine, Ellen L
Sent: Monday, July 15, 2024 8:12 AM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>

Cc: wisenberg18 <wisenberg18@outlook.com>; hollund <hollund@bevcomm.net>
Subject: RE: Xcell energy power lines

Will do! I've sent the request over to our GIS person so should have something for you later today.

Ellen Heine
Xcel Energy
P: 612.330.6073 **C:** 651-247-0957
E: ellen.l.heine@xcelenergy.com

From: Davis, Richard (COMM) <richard.davis@state.mn.us>
Sent: Friday, July 12, 2024 6:22 PM
To: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>
Cc: wisenberg18 <wisenberg18@outlook.com>; hollund <hollund@bevcomm.net>
Subject: FW: Xcell energy power lines

Hi Ellen,

I have received the map request below from Wayne, he owns land just south of Madison Lake. Please email Wayne a map to show how the proposed routes will cross his property, and copy me on the correspondence so I can follow up with him to find out if he has any additional questions or comments with respect to the EIS scoping process.

Thank you much,
Rich

From: wisenberg18 <wisenberg18@outlook.com>
Sent: Friday, July 12, 2024 1:56 PM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Cc: hollund <hollund@bevcomm.net>
Subject: Re: Xcell energy power lines

Hi Richard,

Our land is just on the south side of Madison Lake by less than a mile and 1/2. So in that area and then the other proposed routes in that area would be nice to see. A map of how they would go thru the field on proposed sites and the number attached to each route.

Thank you
Wayne

On Jul 12, 2024 at 11:33 AM, Davis, Richard (COMM) <richard.davis@state.mn.us> wrote:

Hello Wayne,

Just to clarify, are you looking for the maps of the proposed project routes as Xcel has submitted them, within 10 miles of Madison Lake? Or, are you looking for maps that show the areas in a 10 mile radius around Madison Lake?

I only ask because the project area does extend 10 miles west and east of Madison Lake, generally, but the proposed project area does not extend north or south of Madison Lake by 10 miles. I want to make sure I am getting you what you are looking for, at the correct scale, and with the correct features shown.

Thank you,
Rich

Richard Davis
Environmental Review Manager
Energy Environmental Review and Analysis
Office: 651-539-1846
Cell : 507-380-6859
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

From: Wayne Isenberg <wisenberg18@outlook.com>
Sent: Friday, July 12, 2024 8:54 AM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Cc: hollund@bevcomm.net
Subject: Xcell energy power lines

Docket number E002/CN-22-532, E002/TL-23-157

Richard,

Could we please get maps of the proposed routes in the 10 mile radius around Madison Lake , Mn.

Thank you,
Wayne Isenberg
507-259-8801
Wisenberg18@outlook.com

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- 3URSRVHG 5RXWH 2SWLRQ
- 6RXWK
- 6WDWH 7UDLO
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Xcel Energy®

Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 280
Saint Paul, MN 55101-2198

Affix Necessary Postage

RICHARD DAVIS
DEPARTMENT OF COMMERCE
85 7TH PLACE EAST STE 280
SAINT PAUL MN 55101-2198

Comment Period Closes Thursday, August 1, 2024, at 4:30 p.m.

Comments must be post-marked or received electronically by the comment deadline.

How to comment:

- Mail comments to the address on this form
- Use the online comment form: https://apps.commerce.state.mn.us/web/project/15507
- Email comments to the Environmental Review Manager: richard.davis@state.mn.us

Comments do not need to be on this form. We encourage you to provide comments in whatever way is most convenient for you. Please include: "Docket Number 22-532/23-157" in all communications. If commenting by email please include "22-532/23-157 Scoping Comment" in the subject line.

THANK YOU for participating in the permitting process! By commenting you are helping inform the Public Utilities Commission's decision regarding this project.

Environmental Impact Statement Scoping Comment Period

Mankato to Mississippi River Transmission Project
Docket Nos. CN-22-532/TL-23-157

Xcel Energy is proposing to construct and operate approximately 130 miles of new 345 kV transmission line from the existing Wilmarth Substation in Mankato to a point near the existing West Faribault Substation (Segment 1 – approximately 48 to 54 miles long), from a point near the existing West Faribault Substation to the existing North Rochester Substation near Pine Island (Segment 2 – approximately 34 to 42 miles long), and from the existing North Rochester Substation near Pine Island to the Mississippi River near Kellogg, Minnesota (Segment 3 – approximately 43 miles long). Segment 3 will be the construction of a 345 kv transmission line in place of an existing 161 kv transmission line, this will create a double circuited 345 kv line. Segment 3 consists of one proposed route, as this segment was permitted by the Commission as part of the CapX2020 Hampton – La Crosse Project. The Project also proposes an approximately 20 miles of new 161 kV transmission line from the existing North Rochester Substation southeast to a connection point with the existing 161 kV Chester transmission line (Segment 4).

For additional project information visit: https://apps.commerce.state.mn.us/web/project/15507 or contact the Environmental Review Manager at: richard.davis@state.mn.us; 651-539-1846; or toll free 1-800-657-3794.

COMMERCE DEPARTMENT

Mankato to Mississippi River Transmission Project

Scoping Comment Form

Please provide your contact information. This information and your comments will be publicly available.

Name: Mark Jacobs Phone: 507-301-1807

Street Address: 14021 480th

City: Waterville State: MN ZIP: 56096

Email: matt jacobs68@gmail.com

Share your comments on the Mankato to Mississippi River Transmission Project. Please be as specific as possible.

- Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility?
- What potential human and environmental impacts of the proposed project should be considered in the EIS?
- Are there any methods to minimize, mitigate, or avoid potential impacts of the proposed project that should be considered in the EIS?
- Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project?
- Are there any unique characteristics of the proposed project area that should be considered in the EIS?

X-cel has always claims need Line be kind on my property was put in 1950's before environmental impacts so our comprehensive need to be done, Soil samples around existing wood poles need to be done as 1950's creosote or chemicals used on poles were not environmentally safe as used today, possible PBC and heavy metal contaminated oils.

When X-cel upgrade from 60KV to 100 KV Customers paying and if upgrade will pay for this and new line. Sure they upgraded cable to handle 160KV but owners never compensated violate original easement clearly for 60KV not 100 KV

No matter what X-cel Expense Customers pay even if selling to another power company

If including additional pages, please number them and tell us how many you are providing: 2 pages

I attended the Waterville meeting and have some concerns.

- In the past, Xcel Energy upgraded a line on my property from 60 kV to 100+ kV and never notified me of the upgrade. They just told me that they were doing maintenance.
- The original easement of 75 feet was for 60 kV and not 100+ kV.
- Any surveying or environmental studies for a 1000 feet easement include private property. Xcel needs my approval to trespass on private property.
- The land in this proposed easement contains old-growth timber. Cutting this timber would expose hills to higher erosion. Terraces would need to be built.
- I also have drainage concerns. This land is in the Cannon Valley watershed, as drainage goes through the property to the Cannon River.
- This property is also part of the Townsend Woods, which may have Federally-protected plants, such as the dwarf trout lily. I check for this in the spring when it is blossom. also Great Horned Owls and P. leafed woodpeckers Bats in old growth trees
- Twenty years ago, when Xcel was replacing poles, I was told that the soil around the poles may be contaminated because the poles were placed in the 1950s before there were restrictions on the treatment of poles. The poles could be contaminated with heavy metals and arsenic, which would leach into the surrounding soil. The soil needs to be tested and removed if contaminated. The contaminants in the soil will spread by farming practices if it is not removed.
- Any power outages will take longer to repair, as we saw after the Derecho storm, because more time will be needed to pad miles to get heavy equipment to the place where repairs are required. Having the transmission line closer to roads would reduce repair time after an outage. On my property only two poles are north of the ditch/creek and the rest are on the south. So trucks have had to cross the ditch/creek for two poles. If all the poles would stay on the south side of the ditch/creek, the trucks would not have to cross the ditch/creek. In the past, numerous pieces of equipment have had to be pulled out of the ditch that tried to cross and have gotten stuck.

Mark Jacobs
14021 480th St
Waterville, MN 56096

M Jacobs
19021 480th St
Watertown, MN
55096

SAINT PAUL MN 550
26 JUL 2024 PM 6 L

FREEDOM

Richard Davis
Department of Commerce
85 7th Place East Ste 280
Saint Paul MN
55101-2195

55101-21955

From:	Dorothy Knish
To:	Davis, Richard (COMM)
Cc:	Jesse Knish; Soumya Ramakrishnan
Subject:	Re: Minnesota Department of Commerce Docket Nos E002/CN-22-532 and E002/TL-23-157 - Jesse Knish Comments
Date:	Monday, July 15, 2024 4:57:35 PM
Attachments:	image001.png PUC EMF Handout (January 2024).pdf

Thank you!
Designbydorothy@gmail.com

On Jul 15, 2024, at 4:25 PM, Davis, Richard (COMM) <richard.davis@state.mn.us> wrote:

Hello Dorothy,

I want start by saying thank you for your questions and comments. I should also note that I work for the State of Minnesota, and that some of the answers I have provided below are based on the proposed project application that was submitted by Xcel Energy. The full application with maps can be found here; https://apps.commerce.state.mn.us/eera/web/file-list/15584.

Below I have listed your questions, and italicized them, and my responses are provided in blue font.

Why this is necessary to be done, the purpose of the upgrade, and who is benefiting from the upgrade?

The project Xcel Energy has proposed is intended to reduce current issues of congestion on currently existing transmission lines in southern Minnesota, and to help move renewable energy generated in SW Minnesota toward load demands in Wisconsin. The current transmission system was built to function better under conditions where energy generation was coming from coal-fired power plants, and energy generation is shifting away from coal to combined cycle gas generation and renewable energies, so the transmission system is needed to provide greater capacity.

The companies involved with the proposed project are Xcel Energy, Dairyland Power Cooperative, Southern Minnesota Municipal Power Agency, and the City of Rochester Public Utility Board. The companies involved will benefit, and long term benefits should be seen by the renewable energy generation projects in southwest MN, and ultimately

rates payers in Minnesota, Wisconsin, and possibly Iowa.

Specifically, exactly what is the benefit of increasing this powerline to the proposed level?

One of the largest benefits I can see is being able to improve the transmission of renewable energy generation to areas with load demands located significant distances away from where those generation facilities are located. Congestion on transmission lines is currently causing some wind farms to curtail their generation because the grid can't handle the energy.

Who will get the benefit of the power line increase?

The companies involved with the proposed project are Xcel Energy, Dairyland Power Cooperative, Southern Minnesota Municipal Power Agency, and the City of Rochester Public Utility Board. The companies involved will benefit, and long term benefits should be seen by the renewable energy generation projects in southwest MN, and ultimately rates payers in Minnesota, Wisconsin, and possibly Iowa.

And are there alternative sources available that could be used instead of having to intrude on private property owners land and use?

At this time no other energy generation sources have been considered for this project, as the generation facilities have been constructed and are operational. Projects that are a different type than what has been proposed, are referred to as system alternatives, and we have requested that individuals provide comments or provide system alternatives during the current comment period so we can consider it for inclusion in the environmental impact statement (EIS).

Is this new transmission line going to be able to power the grid in our area? And how does it benefit us?

This is a difficult question to answer because the scale of the "electrical grid in our area" is difficult to define. The electrical grid in our area is essentially tied into the larger Midwest grid, so upgrades such as the proposed project could indirectly benefit the "local grid" by providing better reliability and reduced line congestion, which benefits the entire grid and ultimately should reduce energy costs for all rate payers. The new transmission line will not produce any power, but the power being moved by the proposed transmission lines will interconnect at multiple substation and some of the power may be used in the "local grid", if the demand pulls from a connected distribution line.

Will it work for serving our area with substations for electric vehicle charging for future vehicle use that is being mandated but not able to be affective because we have insufficient charging stations in our area, or is it being built to just move electricity from

across the route to somewhere else?

The proposed project is not specifically dedicated for providing energy for electric vehicle charging, but if charging stations are built in the project area it may draw power from one of the substations involved in the project.

Who gets the benefits after we lose our right to use our land in the way we choose after we have made time, sweat and monetary investments in it, maintain it, and pay property taxes on it?

Xcel Energy will be responsible for negotiating agreements and easements with landowners along the selected route, if the Commission issues them a route permit. There will be some restrictions within the transmission line right of way for safety and line clearance reasons, but at this time I believe Xcel plans for private landowners to retain ownership of the property.

Will the new lines be taking in the solar energy that has increased in the area that already is using up more and more agricultural land, or is it taking on electric power from other sources in the area to run through the lines? Or is it feeding off a nuclear plant and moved to the big cities and increasing usage and waste from that source and also is not good for our environment.

At this time the proposed transmission line will be moving energy generated at wind and solar facilities in southwest Minnesota, across southern Minnesota, toward Wisconsin. At this time, we don't know of any nuclear plant that will be sending energy through the proposed transmission line, but that's not to say that it could potentially be used for nuclear or combined gas cycle energies in the future.

At the meeting, they also discussed shockwaves and the effect on living beings that needs to be addressed now and in the future, if the proposed lines are built, plus the handout provided that showed that there have been studies done that show health issues from the increased Electrical current are real for both human beings and wildlife or domestic animals needs to be a priority to be considered in allowing this project or not.

Transmission lines don't produce shockwaves to the best of my knowledge, I believe you maybe referring to electro-magnetic fields (EMF) and possibly stray voltage. EMF and stray voltage will both be studied and analyzed in the EIS we will be completing. Generally speaking EMF produced by transmission lines is the greatest directly below the centerline of the right of way, but it dissipates to safe levels as you move toward the edges of the transmission right of way. I believe the handout you are referring to was distributed by another meeting attendee, not associated with our agency, and I would encourage you to also look at the EMF handout I have attached for additional information.

I look forward to any additional comments or questions you may.

Sincerely,

Rich Davis

Richard Davis
Environmental Review Manager
Energy Environmental Review and Analysis
Office: 651-539-1846
Cell : 507-380-6859
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

From: Dorothy Knish <designbydorothy@gmail.com>
Sent: Thursday, July 11, 2024 12:12 PM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Cc: Jesse Knish <jesseknish@gmail.com>; Soumya Ramakrishnan <soumyastar@gmail.com>
Subject: Re: Minnesota Department of Commerce Docket Nos E002/CN-22-532 and E002/TL-23-157 - Jesse Knish Comments

I also would like to add some additional comments. As the contract for deed holder on a property within the proposed “south one segment”, I need the property to maintain its value and land use options, as intended when it was sold to my son.

This will not be the case if the powerline uses this “south 1” route. It sounded like at the meeting the alternative route “north one” which is where the old powerline already runs would be a much better choice since there are already easements and the existing power lines in that area that would then be altered to fit/upgraded for future higher voltage use in a more economic and less invasive manner then if this route is

chosen along a major and heavily traveled highway with houses and use of property displacement in the south 1 area.

I have received no information except for the forwarded copy of the letter on the comments meeting that my son sent to me. Yet, when I pulled the maps up at the meeting to show where this property fell within the proposed routes the maps still listed me on the property in their mapping system which must have been pulled before we recorded the contract for deed sale. Since I still have a vested interest in the monetary value of the property I have many questions. I have not seen these answers and maybe they were provided in prior information but not to me. So my second concern is that I have some more background information sent to me and other property owners who may be affected before the judge would allow this project to proceed and that we are all given a good understanding of why this is necessary to be done, the purpose of the upgrade, and who is benefiting from the upgrade? If they would allow the project to proceed, I would not want it to proceed on this proposed route, but rather at the route where the older powerlines already exist at north 1.

Specifically exactly what is the benefit of increasing this powerline to the proposed level? Who will get the benefit of the power line increase? And are there alternative sources available that could be used instead of having to intrude on private property owners land and use? It was brought up at the meeting that there is at least one homeowner who will lose a family property that has been in their family for 100 years. They just built a new house there and that is very unfair to them. Is this new transmission line going to be able to power the grid in our area? And how does it benefit us? Will it work for serving our area with substations for electric vehicle charging for future vehicle use that is being mandated but not able to be affective because we have insufficient charging stations in our area, or is it being built to just move electricity from across the route to somewhere else? who gets the benefits after we lose our right to use our land in the way we choose after we have made time, sweat and monetary investments in it, maintain it, and pay property taxes on it? Also if the easement encroaches our property then the business that we pay income tax on and the money we generate from the property is lost or reduced in both current and future income from this proposal.

Will the new lines be taking in the solar energy that has increased in the area that already is using up more and more agricultural land, or is it taking on electric power from other sources in the area to run through the lines? Or is it feeding off a nuclear plant and moved to the big cities and increasing usage and waste from that source and also is not good for our environment.

As you can see, I have more questions than answers which need to be addressed. Once more information is known I may also have more comments and I understand time is short here for that process.

As mentioned this proposed route will also cross Whitewater Creek, other bodies of

water and sloughs, or wildlife areas which will be interfering with the habitat and health of many species in our area.

At the meeting, they also discussed shockwaves and the effect on living beings that needs to be addressed now and in the future, if the proposed lines are built, plus the handout provided that showed that there have been studies done that show health issues from the increased Electrical current are real for both human beings and wildlife or domestic animals needs to be a priority to be considered in allowing this project or not.

Please consider our concerns and understand that in no way would I want the route to run under the south one proposal. Even if these concerns are addressed it would make more sense to be increasing the line in the area of the north one proposal, where, as I said before, the current line already runs.

Thank you for your time. If there is a way to add me to a email list to receive future information, have questions answered any information about further meetings, comments, and results please do so.
Thank you.

Dorothy Knish

Designbydorothy@gmail.com

> On Jul 11, 2024, at 11:15 AM, Davis, Richard (COMM) <richard.davis@state.mn.us> wrote:
>
> Hello Jesse,
>
> Thank you for your comments, and I will take them into consideration as I work to develop the EIS Scoping Decision.
>
> I appreciate you taking the time to share your concerns about the proposed project.
>
> Sincerely,
> Rich Davis
>
> Richard Davis
> Environmental Review Manager
> Energy Environmental Review and Analysis
> Office: 651-539-1846
> Cell : 507-380-6859

mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

<image001.png>

From: Jesse Knish <jesseknish@gmail.com>
Sent: Wednesday, July 10, 2024 2:50 PM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Cc: Soumya Ramakrishnan <soumyastar@gmail.com>; DOROTHY KNISH <designbydorothy@gmail.com>
Subject: Minnesota Department of Commerce Docket Nos E002/CN-22-532 and E002/TL-23-157 - Jesse Knish Comments

---

Property Owner:
Jesse Knish & Soumya Ramakrishnan
Phone: 512-431-7443

Property Location:
51032 147th Avenue
Waterville, MN 56096

07/10/2024

Richard Davis
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Dear Mr. Davis,

I am writing to formally object to the Mankato-Mississippi River 345 kV Transmission Line Project under Docket Nos E002/CN-22-532 and E002/TL-23-157, specifically regarding the proposed "1 South" route through the south side of Waterville, MN. As a property owner at 51032 147th Avenue, Waterville, MN 56096, I have several concerns about the negative impact this project will have on my property and the surrounding community.

1. Negative Impact on Property and Land Usage

The proposed transmission line will significantly impact the usability and value of my property. The presence of high-voltage transmission lines can lead to restrictions on building and land usage, making it difficult to develop or utilize the land for future projects. This directly affects my ability to improve or sell the property at its full potential value. Additionally, the aesthetic impact of the transmission lines could reduce the overall appeal of the area, potentially decreasing property values and hindering community growth.

2. Future Development of the Land

The proposed route may impede future development plans for the land. As a real estate investor, I have a vested interest in the continued development and improvement of my property. The installation of the transmission lines may limit opportunities for constructing new buildings, expanding current structures, or altering the land to suit new purposes. This limitation not only affects my property but also the potential economic growth of the area.

3. Human and Environmental Impacts

The Environmental Impact Statement (EIS) must thoroughly consider the potential human and environmental impacts of the proposed project. Specifically, the following concerns should be addressed:

1.
2.
3. **Health Risks:**
4. Proximity to high-voltage transmission lines has been associated with various health concerns, including increased

risk of certain cancers, neurological disorders, and other health issues. The long-term exposure of residents to electromagnetic fields (EMFs)

5. should be a critical consideration in the EIS.
6.
7.
8.
9. **Wildlife and Habitat Disruption:**
10. The construction and maintenance of transmission lines can disrupt local wildlife and their habitats. The EIS should evaluate the potential effects on local ecosystems, including the impact on deer, turkeys, fish, migratory bird patterns, native plant species,
11. and the overall biodiversity of the area including Whitewater Creek.
12.
13.
14.
15. **Soil and Water Quality:**
16. The construction process can lead to soil erosion, sedimentation in water bodies, and potential contamination from construction materials. The EIS should assess the risk of soil degradation and water quality impairment, particularly in agricultural and residential
17. areas.
18.
19.
20.
21. **Visual and Noise Pollution:**
22. The presence of large transmission towers and lines can contribute to visual pollution, altering the natural landscape and aesthetic value of the area. Additionally, the noise generated during construction and ongoing maintenance can affect the quality of
23. life for local residents.
24.
25.
26.

27. **Cultural and Historical Preservation:**

28. The proposed route should be evaluated for any potential impacts on culturally or historically significant sites. The EIS should ensure that the project does not infringe on protected areas or disrupt sites of historical importance.

4. Consideration of Alternative Routes

Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project? It is crucial that all possible alternatives are explored to minimize the detrimental effects on residential properties, environmental resources, and the local community. Potential alternative routes that avoid densely populated areas, sensitive ecosystems, and historically significant sites should be prioritized to reduce the overall impact of the transmission line project.

In conclusion, I urge the Minnesota Department of Commerce to reconsider the proposed "1 South" route through Waterville, MN, and to fully evaluate the potential human and environmental impacts in the EIS. The negative consequences of this project on my property, the future development of the land, and the well-being of the local community must be carefully weighed against the purported benefits of the transmission line.

Thank you for your attention to this matter. I look forward to your response and hope that my concerns will be taken into serious consideration.

Sincerely,

Jesse Knish

Phone: +1.512.431.7443
Email: jesseknish@gmail.com
Connect on LinkedIn
Schedule a meeting here!

MINNESOTA
PUBLIC UTILITIES COMMISSION

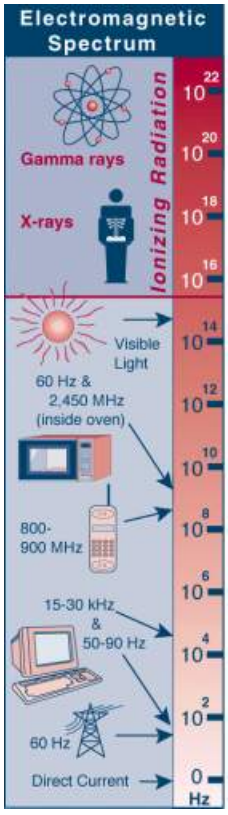
Electric and Magnetic Fields (EMF)

The Minnesota Public Utilities Commission provides this information on electric and magnetic fields (EMF) for members of the public who may be affected by the construction and operation of high-voltage transmission lines in the State of Minnesota. Its purpose is to discuss electric and magnetic fields associated with high-voltage transmission lines, what is known about the potential health effects of electric and magnetic fields, and how exposure levels are regulated.

The Minnesota State Interagency Working Group on EMF Issues' *A White Paper on Electric and Magnetic Field (EMF) Policy and Mitigation Options* is the main source of material used in this document.

Electromagnetic Spectrum

Electric and magnetic fields are invisible areas of force resulting from the presence of electricity. Naturally occurring electric and magnetic fields are caused by the earth's weather and geomagnetic field. Man-made electric and magnetic fields are created by any electrical device and are found wherever electricity is used. Electric and magnetic fields are regularly combined and referred to as EMF.



Electric fields are created by the electric charge (voltage) of a transmission line. Electric field strength is typically measured in kilovolts per meter (kV/m). The strength of an electric field decreases rapidly as the distance from the source increases. Electric fields are easily shielded or weakened by most objects and materials, such as trees and buildings.

Magnetic fields are created by the electrical current (amps) moving through a transmission line. Magnetic field strength is typically measured in milliGauss (mG). Similar to electric fields, the strength of a magnetic field decreases rapidly as the distance from the source increases. Unlike electric fields, magnetic fields are not easily shielded or weakened by objects or materials.

EMF are often characterized and distinguished by their frequencies (*i.e.*, the rate at which the fields change direction each second). EMF are typically grouped into one of two frequency categories: non-ionizing or low-level radiation generally harmless to humans; and ionizing or high-level radiation which has the potential for cellular or DNA damage.

All electrical lines in the United States have a frequency of 60 cycles per second or 60 Hertz (Hz). EMF at this frequency level is categorized as non-ionizing or extremely low frequency (ELF) radiation.

Study and Research

A common concern related to EMF is the potential for adverse health effects due to EMF exposure. Since the 1970s, extensive research has been conducted on the health effects of EMF including animal studies, epidemiological studies, clinical studies, and cellular studies.

The research data has been reviewed and studied by several scientific panels and commissions, such as the National Institute of Environmental Health Sciences (NIEHS), the World Health Organization (WHO), the International Agency for Research on Cancer (IARC), the Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), and the Minnesota State Interagency Working Group. In general, these organizations agree that:

- Some epidemiological studies have shown a weak association between childhood leukemia and increasing exposure to EMF. However, epidemiological studies alone are considered insufficient to conclude a cause-and-effect relationship, and the association must be supported by data from laboratory studies. In addition, epidemiological studies of various other diseases, in both children and adults, have failed to show any consistent pattern of harm from EMF.

- Laboratory studies have failed to substantiate a relationship between EMF and adverse human health effects, even at high exposure levels.

- Researchers continue to investigate possible mechanisms for how low frequency EMF may cause indirect biological effects. However, to date, a biological mechanism for how EMFs might cause disease has not been established.

- Overall, the current body of evidence is insufficient to establish a cause-and-effect relationship between EMF and adverse health effects.

Regulation of EMF

Regulation of EMF exposure from high-voltage transmission lines typically falls under the purview of state utility commissions. In Minnesota, the Public Utilities Commission regulates the construction and operation of high-voltage transmission lines. This regulation includes the issuance of transmission line routing permits which address potential health effects of such lines.

EMF estimates for a proposed project are typically calculated for at least two points of interest: (1) directly under the transmission line (also known as "on the right-of-way"); and (2) at the edge of the transmission line's right-of-way. The quantity of power (voltage and current) carried by a transmission line, the type and arrangement of the structures supporting the lines, the arrangement of the lines on the structures, and the distance from the transmission line are all factors that affect the EMF levels.

There are currently no federal regulations regarding allowable EMF produced by transmission lines in the United States. However, a few states have developed state-specific regulations for transmission lines. The Minnesota Public Utilities Commission has established a standard that limits the maximum electric field under transmission lines to 8 kV/m, as measured one meter above ground level. Minnesota has not established a magnetic field standard for transmission lines. Standards and guidance levels established by other states and national and international professional organizations are provided in the tables below.

State Transmission Line Standards and Guidelines

State	On Right-of-Way		Edge of Right-of-Way	
	Max. Electric Field (kV/m)	Max. Magnetic Field (mG)	Max. Electric Field (kV/m)	Max. Magnetic Field (mG)
Florida				
<=230 kV	8	---	2	150
<=500 kV and >230 kV	10	---	2	200
>500 kV	15	---	5.5	250
Massachusetts	---	---	1.8	85
Minnesota	8	---	---	---
New Jersey	---	---	3	---
New York	---	---	1.6	200
Oregon	9	---	---	---

Organization Transmission Line Guidelines

Organization	Electric Field (kV/m)	Magnetic Field (mG)	Notes
American Conference of Governmental and Industrial Hygienists (ACGIH)	25	10,000	Occupational standard for general worker
International Commission on Non-Ionizing Radiation Protection (ICNIRP)	4.2	2,000	General public continuous exposure
Institute of Electrical and Electronics Engineers (IEEE)	5	9,040	General public continuous exposure

Mitigation of EMF

The Minnesota State Interagency Working Group on EMF Issues suggested in 2002 that Minnesota take a prudent avoidance, or precautionary approach to addressing potential health consequences from EMF exposure from transmission lines. The Work Group's policy suggestions are based on the prudent avoidance approach and include:

- Application of low-cost EMF mitigation options in electric infrastructure construction projects, such as distance considerations, phase cancellation methods, shielding, and voltage or current reduction;
- Encouraging conservation;
- Encouraging distributed generation;
- Continued monitoring of EMF research;
- Encouraging utilities to work with customers on household EMF issues; and
- Providing public education on EMF issues.

References and Resources

Minnesota State Interagency Working Group on EMF Issues, *A White Paper on Electric and Magnetic Field (EMF) Policy and Mitigation Options*, (September 2002), https://eera.web.commerce.state.mn.us/eera/web/project-file?legacyPath=/opt/documents/EMF%20White%20Paper%20-%20MN%20Workgroup%20Sep%202002.pdf .
International Commission on Non-Ionizing Radiation Protection, https://www.icnirp.org/en/frequencies/low-frequency/index.html.
National Institute of Environmental Health Sciences, Electric and Magnetic Fields, http://www.niehs.nih.gov/health/topics/agents/emf/ .
U.S. Environmental Protection Agency; Electrical and Magnetic Fields from Power Lines; https://www.epa.gov/radtown/electric-and-magnetic-fields-power-lines.
World Health Organization, Electromagnetic Fields, http://www.who.int/peh-emf/en/.

From:	Jesse Knish
To:	Davis, Richard (COMM)
Cc:	Soumya Ramakrishnan; DOROTHY KNISH
Subject:	Minnesota Department of Commerce Docket Nos E002/CN-22-532 and E002/TL-23-157 - Jesse Knish Comments
Date:	Wednesday, July 10, 2024 2:51:41 PM
Attachments:	Minnesota Department of Commerce_Docket Nos E002_CN-22-532 and E002_TL-23-157_Jesse Knish Comments (1).pdf

Property Owner:
Jesse Knish & Soumya Ramakrishnan
Phone: 512-431-7443

Property Location:
51032 147th Avenue
Waterville, MN 56096

07/10/2024

Richard Davis
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Dear Mr. Davis,

I am writing to formally object to the Mankato-Mississippi River 345 kV Transmission Line Project under Docket Nos E002/CN-22-532 and E002/TL-23-157, specifically regarding the proposed "1 South" route through the south side of Waterville, MN. As a property owner at 51032 147th Avenue, Waterville, MN 56096, I have several concerns about the negative impact this project will have on my property and the surrounding community.

1. Negative Impact on Property and Land Usage

The proposed transmission line will significantly impact the usability and value of my property. The presence of high-voltage transmission lines can lead to restrictions on building and land usage, making it difficult to develop or utilize the land for future projects. This directly affects my ability to improve or sell the property at its full potential value. Additionally, the aesthetic impact of the transmission lines could reduce the overall appeal of the area, potentially decreasing property values and hindering community growth.

2. Future Development of the Land

The proposed route may impede future development plans for the land. As a real estate investor, I have a vested interest in the continued development and improvement of my property. The installation of the transmission lines may limit opportunities for constructing new buildings, expanding current structures, or altering the land to suit new purposes. This limitation not only affects my property but also the potential economic growth of the area.

3. Human and Environmental Impacts

The Environmental Impact Statement (EIS) must thoroughly consider the potential human and environmental impacts of the proposed project. Specifically, the following concerns should be addressed:

- **Health Risks:** Proximity to high-voltage transmission lines has been associated with various health concerns, including increased risk of certain cancers, neurological disorders, and other health issues. The long-term exposure of residents to electromagnetic fields (EMFs) should be a critical consideration in the EIS.

- **Wildlife and Habitat Disruption:** The construction and maintenance of transmission lines can disrupt local wildlife and their habitats. The EIS should evaluate the potential effects on local ecosystems, including the impact on deer, turkeys, fish, migratory bird patterns, native plant species, and the overall biodiversity of the area including Whitewater Creek.

- **Soil and Water Quality:** The construction process can lead to soil erosion, sedimentation in water bodies, and potential contamination from construction materials. The EIS should assess the risk of soil degradation and water quality impairment, particularly in agricultural and residential areas.

- **Visual and Noise Pollution:** The presence of large transmission towers and lines can contribute to visual pollution, altering the natural landscape and aesthetic value of the area. Additionally, the noise generated during construction and ongoing maintenance can affect the quality of life for local residents.

- **Cultural and Historical Preservation:** The proposed route should be evaluated for any potential impacts on culturally or historically significant sites. The EIS should ensure that the project does not infringe on protected areas or disrupt sites of historical importance.

4. Consideration of Alternative Routes

Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project? It is crucial that all possible alternatives are explored to minimize the detrimental effects on residential properties, environmental resources, and the local community. Potential alternative routes that avoid densely populated areas, sensitive ecosystems, and historically significant sites should be prioritized to reduce the overall impact of the transmission line project.

In conclusion, I urge the Minnesota Department of Commerce to reconsider the proposed "1 South" route through Waterville, MN, and to fully evaluate the potential human and environmental impacts in the EIS. The negative consequences of this project on my property, the future development of the land, and the well-being of the local community must be carefully weighed against the purported benefits of the transmission line.

Thank you for your attention to this matter. I look forward to your response and hope that my concerns will be taken into serious consideration.

Sincerely,

Jesse Knish

Phone: +1.512.431.7443
Email: jesseknish@gmail.com
Connect on LinkedIn
Schedule a meeting here!

Property Owner:
Jesse Knish & Soumya Ramakrishnan
Phone: 512-431-7443

Property Location:
51032 147th Avenue
Waterville, MN 56096

07/10/2024

Richard Davis
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

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2. Future Development of the Land

The proposed route may impede future development plans for the land. As a real estate investor, I have a vested interest in the continued development and improvement of my property. The installation of the transmission lines may limit opportunities for constructing new buildings, expanding current structures, or altering the land to suit new purposes. This limitation not only affects my property but also the potential economic growth of the area.

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- **Wildlife and Habitat Disruption:** The construction and maintenance of transmission lines can disrupt local wildlife and their habitats. The EIS should evaluate the potential effects on local ecosystems, including the impact on deer, turkeys, fish, migratory bird patterns, native plant species, and the overall biodiversity of the area.
- **Soil and Water Quality:** The construction process can lead to soil erosion, sedimentation in water bodies, and potential contamination from construction materials. The EIS should assess the risk of soil degradation and water quality impairment, particularly in agricultural and residential areas.
- **Visual and Noise Pollution:** The presence of large transmission towers and lines can contribute to visual pollution, altering the natural landscape and aesthetic value of the area. Additionally, the noise generated during construction and ongoing maintenance can affect the quality of life for local residents.
- **Cultural and Historical Preservation:** The proposed route should be evaluated for any potential impacts on culturally or historically significant sites. The EIS should ensure that the project does not infringe on protected areas or disrupt sites of historical importance.

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In conclusion, I urge the Minnesota Department of Commerce to reconsider the proposed "1 South" route through Waterville, MN, and to fully evaluate the potential human and environmental impacts in the EIS. The negative consequences of this project on my property, the future development of the land, and the well-being of the local community must be carefully weighed against the purported benefits of the transmission line.

Thank you for your attention to this matter. I look forward to your response and hope that my concerns will be taken into serious consideration.

Sincerely,

Jesse Knish

Thank you for the opportunity to provide comment on the proposed Transmission line project, Docket # E002/CN-22-532, E002/TL-23-157

I am a landowner who was impacted by the CAPX2020 project. During that project I was assured multiple times that there would be no electrical "leaks" (I am sure there is a special name given to this phenomenon, I just do not know what it is called), or other forms of electrical conveyance from that project, which being a dairy farmer at the time, I was very sensitized to "stray voltage" issues. Well those assurances proved to be FALSE because as soon as the CAPX2020 line was energized, the Northern Natural Gas Pipeline near the transmission line suffered cathodic protection impact. The mitigation option utilized to address the factual situation was to install a copper line in the ground between the pipeline and the transmission line to intercept the underground electrical current flow. I bring this up because if the commission chooses to create a "New line/corridor" instead of using the existing CAPX2020 system (which has already been mitigated), there needs to be provisions installed (underground copper wires on both sides of the new transmission lines to intercept this unintended current flow) from the very beginning to prevent the electrical "Leaks" from freely flowing through the ground and impacting the surrounding environment.

Thank you

Keith Knutson

From:	eera.admin_no_reply@state.mn.us
To:	Davis, Richard (COMM)
Subject:	Public Comment re: Mankato to Mississippi River Transmission Project
Date:	Tuesday, July 30, 2024 11:44:34 PM
Attachments:	Thank you for the opportunity to provide comment on the proposed Transmission line project.docx

Mankato to Mississippi River Transmission Project

Submitter Name: KEITH KNUTSON

Submitter Email: KAZKNUT@GMAIL.COM

Submitter Telephone: (507) 732-5205

Comment:
Thank you for the opportunity to provide comment on the proposed Transmission line project, Docket # E002/CN-22-532, E002/TL-23-157 I am a land owner who was impacted by the CAPX2020 project. During that project I was assured multiple times that there would be no electrical "leaks" (I am sure there is a special name given to this phenomenon, I just do not know what it is called), or other forms of electrical conveyance from that project, which being a dairy farmer at the time, I was very sensitized to "stray voltage" issues. Well those assurances proved to be FALSE because as soon as the CAPX2020 line was energized, the Northern Natural Gas Pipeline near the transmission line suffered cathodic protection impact. The mitigation option utilized to address the factual situation was to install a copper line in the ground between the pipeline and the transmission line to intercept the underground electrical current flow. I bring this up because if the commission chooses to create a "New line/corridor" instead of using the existing CAPX2020 system (which has already been mitigated), there needs to be provisions installed (underground copper wires on both sides of the new transmission lines to intercept this unintended current flow) from the very beginning to prevent the electrical "Leaks" from freely flowing through the ground and impacting the surrounding environment. Thank you Keith Knutson

Submit Date: 07/31/2024 04:43 AM

From: matt kuehl
To: Davis, Richard (COMM)
Cc: Panait, Cezar M (PUC); Heine, Ellen L
Subject: Docket Number : E002/CN-22-532, TL-23-157
Date: Monday, July 8, 2024 6:49:12 PM

My name is Matt Kuehl, I am a landowner in the area of the above-mentioned docket and I have some comments and questions of concern.

Xcel is a "private business" asking the state as a "government entity" for approval on a project. With the approval they can use eminent domain therefore the 5th amendment mandates just compensation. Then Xcel will negotiate with the land owner, a "private entity". Compensation will be done by different ways & a permanent utility easement forced. My understanding of eminent domain is to help a growing population then to force projects on individual property owners.

My questions are:

1: Why is Xcel a "private business" not involving county and city tax assessors and a "government entity" on the permanent loss of tax base due to permanent devaluation of properties affected?

2: Why are these individuals unfairly burdened with no devaluation of property taxes by a "government entity" forever by a "private business"?

The proposed route goes through some of the most natural areas of my farm. I understand nobody wants these easements but I believe the damage is felt more in these kinds of areas. With the removal of trees, vegetation, disruption of wildlife, & earth working including the creek more than the agricultural land. This route will also dissect and land lock portions of 2 of my farms.

As there gets to be less and less of these natural land areas for wildlife to roam and trees to grow, why would we disrupt these few and far between areas? It seems there are other routes with less disruption that would be easier to build and maintain.

From: Davis, Richard (COMM)
To: lmattson
Subject: RE: Xcel Energy Line Route
Date: Tuesday, July 23, 2024 1:16:00 PM
Attachments: image001.png

Hello Mr. Mattson,

More detailed project maps can be found on the EERA project web page, https://apps.commerce.state.mn.us/eera/web/file-list/15584.

Specific to the city of Oronoco Maps Segment 4 – 4 https://eera.web.commerce.state.mn.us/web/project-file/12926 , and Segment 4 – 5, https://eera.web.commerce.state.mn.us/web/project-file/12927 are probably the most helpful.

If you would like to see maps for a specific property, please let me know, and I can get you in touch with Xcel's mapping specialists.

If you have any questions or comments don't hesitate to reach out.

Thank you,
Rich

Richard Davis
Environmental Review Manager
Energy Environmental Review and Analysis
Office: 651-539-1846
Cell : 507-380-6859
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

From: lmattson <lmattson@aol.com>
Sent: Friday, July 19, 2024 10:44 AM

To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Subject: Fw: Xcel Energy Line Route

Is there a way to zoom on the map that was in the News Record newspaper to see the proposed route close up in the Oronoco area?
Thanks,
Larry Mattson

From: eera.admin_no_reply@state.mn.us
To: Davis, Richard (COMM)
Subject: Public Comment re: Mankato to Mississippi River Transmission Project
Date: Wednesday, July 24, 2024 9:23:52 PM

Mankato to Mississippi River Transmission Project

Submitter Name: Samuel Matzek

Submitter Email: samuel.matzek@gmail.com

Submitter Telephone:

Comment:
When looking at the route comparison tables in Appendix L of the application (https://mmrtproject.com/documents/filing/MMRT_CombinedApplication_AppendixL_Apr2024.pdf) you can see that Segment 4 West option has more environmental impacts than Segment 4 East: 1. The west route has 1.8x the number of right-of-way acres required. The right-of-way acres consume an additional 110 acres of prime farmland and 2.3x the number of acres listed as "Farmland of State Importance". Given the importance of our food production supply this difference in the east and west options should not be overlooked. 2. The segment 4 west route has 45.78 acres of deciduous forest in the right-of-way whereas the east route has only 5.65. The west route will thus impact more of our forest lands and clearing the right-of-ways in the forest lands will add to the project cost and on-going maintenance of the lines. 3. The segment 4 west route has 1.9x number of wetland acres in the right-of-way than the segment 4 east route. Protecting the wetlands from the pollution caused by construction and preserving them for general water quality should be a priority. 4. The segment 4 west route is listed as having 4 "MNDNR Native Plant Communities Within Right-of-Way" and the east route has 0. For these environmental reasons I believe that the segment 4 east route should be chosen over the segment 4 west route. If for some reason the segment 4 west route must be chosen over segment 3 then I feel that the "4 West A" option along the existing 161kV line is the better than the "regular" 4 West option. This is because it will make use of existing easements and right-of-way and should be able to make use of either existing poles or existing pole locations. The use of existing easements, right-of-way, and likely reuse of poles and pole foundations should result in a lower project cost.

Submit Date: 07/25/2024 02:22 AM

From: Carol A. Overland
To: Davis, Richard (CDDM)
Subject: Scoping Comment - CN-23-532 TL-23-157 Wilmarth-Tremval
Date: Monday, July 29, 2024 7:56:05 AM
Attachments: SCOPING_Re Cash Porto Family_23-232 23-157.pdf

Scoping Comment attached and eFiled

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"Our lives begin to end the day we become silent
about the things that matter." Dr. Martin Luther King, Jr.

Carol A. Overland
Attorney at Law
Legalectric - Overland Law Office
1110 West Avenue
Red Wing, MN 55066

612-227-8638

overland@legalectric.org

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.legalectric.org%2F&data=05%7C02%7Crichard.davis%40state.mn.us%7C4d1a75996b544b23331b08dcafcd4b87%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C638578545644360618%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=4MXkOS6adkrP4GV9LrHArvcdC3fX1sTLYfExCFkMwwFCE%3D&reserved=0
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https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.not-so-great-northern-transmission-line.org%2F&data=05%7C02%7Crichard.davis%40state.mn.us%7C4d1a75996b544b23331b08dcafcd4b87%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C638578545644374013%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=6LhxBh92GflalPTCf0UWgDcwoUQLKCyO6CBtPoYqe4%3D&reserved=0

Legalectric, Inc.
Carol Overland **Attorney at Law, MN #254617**
Energy Consultant—Transmission, Power Plants, Nuclear Waste
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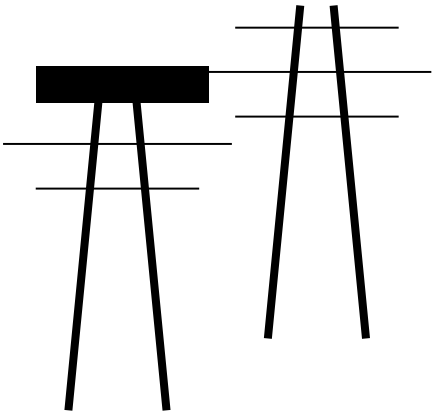


July 29, 2024

Rich Davis
EERA via eDockets & richard.davis@state.mn.us
MN Dept of Commerce
85 – 7th Place East, Suite 280
St. Paul, MN 55101

RE: The Prehn Family & NoCapX 2020 Scoping Comment
Wilmarth-N Rochester-Tremval a/k/a Mankato-Mississippi Transmission Line
PUC Dockets CN-22-532 and TL-23-157

Dear Mr. Davis:

Thank you for the opportunity to file this Comment, and for the Mankato-Mississippi road show over this past week. This Comment is made on behalf of the Prehn Family and NoCapX 2020.

I. PROCEDURAL COMMENTS

A. COMPLIANCE WITH MINNESOTA ENVIRONMENTAL POLICY ACT

An overarching concern regarding environmental review is that although it runs in a track separate from the Certificate of Need and Routing dockets, yet under the Minnesota Environmental Policy Act, it is to **"accompany the proposal through an administrative review process**."

> Subd. 6a. **Comments.** Prior to the preparation of a final environmental impact statement, the governmental unit responsible for the statement shall consult with and request the comments of every governmental office which has jurisdiction by law or special expertise with respect to any environmental effect involved. Copies of the drafts of such statements and the comments and views of the appropriate offices shall be made available to the public. The final detailed environmental impact statement and the comments received thereon shall precede final decisions on the proposed action and shall accompany the proposal through an administrative review process.

Minn. Stat. 116D.04, Subs. 6a.

The rough project schedule is on page 8 of the presentation:

SLIDE 8

Timeline

Event	Date
Application Submitted	April 2, 2024
Application Accepted	June 26, 2024
Public Info Meetings	July 8-11, 2024
EIS Scoping Decision	October 2024
Draft EIS Issued	March 2025
Public Hearings	April 2025
Final EIS Issued	June/July 2025
Commission's Final Decision	September 2025

I've observed project schedules with public hearings, evidentiary hearings, briefing and ALJ recommendation all before the release of FEIS and its attached comments made during environmental review. Although release of FEIS after these steps is before the final decision, it is not "accompanying the proposal through an administrative review process," and does not afford opportunity to submit public comments or public consideration of the adequacy of the FEIS. **THE FINAL EIS SHOULD BE RELEASED BEFORE THE CLOSE OF PUBLIC COMMENTS AND BRIEFING TO ALLOW REVIEW AND COMMENTS ON ADEQUACY** (Yes, I'm SHOUTING, this is important).

This late EIS release has been a problem, particularly where new route segments are added late and there is little or no notice and opportunity to comment regarding those new routes, and whether the FEIS is adequate. For example, this was an issue with the CapX 2020 route in Cannon Falls because the applicant did not pay sufficient to DOT Comments with routing prohibitions and new work-arounds were added at the last minute. The last minute work around was of course the "chosen route" because the preferred route was not acceptable under DOT's Policy of Accommodation." The affected landowners did not have adequate notice nor sufficient opportunity or ability to participate.

B. MISO IS NOT THE REGULATOR

The Commission and Department must be clear in its review that it is the regulator, not MISO, and that review complies with Minnesota statutes and rules.

C. FILING OF AGENCY COMMENTS SEPARATELY IN eDOCKETS

Also a problem during CapX and ongoing was that agency comments such as the DOT's were not made available to the public in a recognizable way, for example, comments were provided to Commerce and were eFiled in groups, with agency comments hidden in a large group of

comments. Agency comments should be filed separately so that they are possible to find. Some agencies have adopted eFiling, making comments available, and this practice should be the norm. Public review of these comments is the only way that the public has to check to see if their "on the ground" concerns are recognized by agencies and to check whether y need to raise issues that they know of that have not been addressed.

D. PRESENTATION AT MEETINGS NEEDS CORRECTIONS AND BEEFING UP

i. Slides 3 and 26 have misstated the hierarchy of means to address impacts:

Provide an opportunity to participate in developing the scope of the EIS.
This includes:

- Commenting on potential impacts of the proposed project;
- Commenting on methods to minimize, mitigate, and avoid potential impacts; and proposing alternative routes or route segments for consideration.

The order should be AVOID, MINIMIZE, and lastly, MITIGATE.

ii. Opportunities for public participation are not sufficiently identified (Presentation, p. 8). As a frequent attendee and participant in meetings and hearings, I often hear comments that "there's nothing I can do," and "it doesn't matter, they won't listen to me." To a point, I can see why someone would say that, but I cannot understand such defeatist mindset. It doesn't help that Commerce and the Commission do not encourage public participation, do not even let people know what they CAN do! Minn. Stat. §216E.08.

For example, the purple "public participation" points should also list the participatory opportunities under statute and rule, including:

- Petition for intervention;
- Participate in the "public hearings," and also as a "participant" in the evidentiary hearings where they can testify, cross-examine and be cross-examined, and offer evidence;
- Affected parties may file Exceptions to the report of the ALJ;
- Request oral argument before the Commission;
- Petition for rehearing, amendment, vacation, reconsideration, or reargument if an affected person or party.

The presentation by PUC and Commerce, ideally the PUC's public participation person, should assure that all options for participation are shown in presentation and handouts, and should orally state them, maybe even have a separate public participation handout. It's very hard for regular folks to navigate the administrative process, and a "HOW-TO" would be helpful.

II. SCOPING COMMENTS - NEED

A. CONSIDERATION OF NEED GOES BEYOND ACCEPTANCE OF APPLICANT'S STATED PURPOSE AND CLAIMED NEED

In the meetings this week, it was stated in the Scoping Notice, the presentation (p. 27) and several times orally that at issue and up for comment is:

> **Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility?**

That statement means that the stated need/purpose as provided by an applicant is accepted and is the starting point for a need discussion. See Draft Scope, 1.0 "Purpose." This means that the purpose is accepted and questioning that purpose as stated is off the table. **NO!**

Size, type and timing of "need" is at issue – that's why there is a Certificate of Need process and criteria in law (Minn. Stat. §216B.243, Subd. 3a (1-12) -- and this is a Certificate of Need docket (CN-22-532). The applicant and/or MISO are not the arbiters of need. A need determination is to be made by the Commission after the review of factors, above, and a decision that is supported by facts and the record. A "stated need" by the applicant and/or a desire of MISO is not sufficient.

B. NEED AND SYSTEM ALTERNATIVES

The EIS must address use of a single circuit 230kV line. According to Xcel's application, page 162, the "System Peak Energy Demand" is 718 MVA. The project is designed for 3,585 MVA, Table 5-1. 3,585 MVA is roughly FIVE TIMES more than Xcel's highest claim of "System Peak Energy Demand" of 718. If "System Peak Energy Demand" is 718 MVA, according to Table 5.1, a single circuit 230kV line would be sufficient! See Draft Scope, 1.0 Design.

C. NEED - CUMULATIVE IMPACTS AND PHASED AND CONNECTED ACTIONS – EFFECT OF FOUR TRANSMISSION LINES PROPOSED IN SOUTHERN MINNESOTA

As testimony in the Arrowhead-Weston project declared 24 years ago regarding transmission, "it's all connected." That's a fundamental characteristic of "the grid." When considering "need," for a project, phased and connected actions must be considered.

This concept is important because, including this project, there are FOUR transmission lines originating in southern Minnesota, two of which go "against the current" of typical transmission power flows:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
    - Against the flow, SW to NE
- MN Energy CONnection – CN-22-131 & TL-22-132
    - Against the flow, SW to NE

In light of all of these projects, and in light of existing transmission in southern Minnesota, is this project needed?

The EIS must evaluate "need" when considering the SW MN 345kV line (CN-01-1958) connecting into the MVP 3, 4 (TL-12-1337 and CN-12-1053), and the delayed but now fully permitted MVP 5, from SW Minnesota down into the top of Iowa and heading east into Wisconsin. Institutional memory:

Consideration of "phased and connected actions" must also include consideration of the Public Utilities Commission's repeated actions of permitting projects where there is no interconnection option available. Those projects waiting for interconnection should be identified, and the Commission's actions declared void. If there is interconnection available, documented and at a cost outlined in the MISO DPP System Impact Study Reports, that cost should be properly allocated to the project developers and not Minnesota ratepayers.

D. LINE LOSSES HAVE IMPACT ON "NEED" FOR A PROJECT

Line losses have an impact on "need" for a project, because the higher the line loss, the more generation must be built to deliver a set amount of energy to its destination. This is typically not considered, and must be. For example, the MN Energy CONnection transmission has declared an expected 200MW or more line loss, meaning that additional amount of generation must be built and paid for if the specific amount of energy is to be delivered, plus reactive power and that construction and transmission service cost weighs against "need" for the project.

Typically, and improperly, the line loss for the project applied for is expressed as a percentage and/or megawatts across the entire MISO system or Eastern Interconnect. Line loss is an aspect of the project that should be reviewed separately for this project, terminal to terminal, for this particular project, and not hidden as a very small percentage or low MW of an undisclosed total energy across the system. Line loss is the amount of energy that would be dissipated by transmission over distance, and the amount and impact of the MW of additional generation to assure the requisite load gets to the other end of the line. The amount of increased generation necessary to make up for line loss will increase "need" for the project, so line loss must be compared between the project as applied for, and all alternatives presented, including the "no build" alternative.

E. ADDITIONAL TRANSMISSION NEEDED STARTING AT WILMARTH?

The EIS must address why the starting point of Wilmarth is proposed for this project, which is not addressed in the application. Does Xcel plan to increase burning of garbage?[1] The Commission has recently been considering increased garbage burning and "biomass," which was been decreased as a matter of policy, and economics, that it was not cost effective and generates CO2. The biomass mandate was legislatively removed from the 1994 Prairie Island legislation and Commission related statutes – there is precedent..

On the other hand, Xcel's IRP 12 years ago stated it would shutter the Wilmarth and Red Wing garbage burners.

> ***For capacity planning and RES compliance planning purposes, we are assuming that Red Wing and Wilmarth will be retired at the end of 2012.***

Xcel IRP, pages 6-7 to 6-8. Xcel apparently recanted on that assumption. Is there a plan to increase garbage incineration? Is there a plan for increased generation in the immediate vicinity of Wilmarth? Where's the "need" for this project?

F. PROJECT IS OVERSIZED FOR XCEL'S "PEAK" OF 718 MVA

The project as proposed is oversized for Xcel's claimed "system peak energy demand" of 718 MVA, state on p. 162 of its application. The EIS, in considering size of the project, must consider a lower voltage line, i.e. a 230 kV single circuit. A 230 kV single circuit would provide 50% more than Xcel's "system peak energy demand," and would be less environmentally impactful and far more economical to build.

[1] See PUC Docket 23-151 and definition of "carbon free."

G. NO-BUILD ALTERNATIVE

Among other things, the "no-build alternative" must be evaluated in the EIS because it may well not be needed in light of the several other projects planned for ssouthern Minnesota:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
- MN Energy CONnection – CN-22-131 & TL-22-132

III. SCOPING COMMENTS – ENVIRONMENTAL REVIEW OF TRANSMISSION PROPOSAL

A. INCLUDE CUMULATIVE IMPACTS AND PHASED AND CONNECTED ACTIONS

The cumulative impacts of existing transmission in the broad area that this project traverses, and phased and connected actions of new transmission proposed must be evaluated in the EIS.

The cumulative impact of the four other transmission projects originating in southern Minnesota could obviate some or even all of any claimed "need" for this project, which must be considered in the EIS. In addition to consideration of the impacts to those already affected by CapX 2020, the EIS must consider the project's "cumulative impacts" because this is one of **FOUR** transmission lines originating in southern Minnesota, all of which will have impacts on the others, and on the transmission system as a whole:

- Wilmarth-North Rochester-Tremval a/k/a Mankato-Mississippi (this docket)
- Brookings-Hampton 2nd circuit – CN-23-200 & TL-08-1474
- Big Stone-Alexandria-Big Oaks – CN-22-538 & TL-23-159/TL23-160
- MN Energy CONnection – CN-22-131 & TL-22-132

As above in paragraph II.C., consideration of "phased and connected actions" must also include consideration of the Public Utilities Commission's repeated actions of permitting projects where there is no interconnection option available. Those projects waiting for interconnection should be identified, and the Commission's actions declared void. If there is interconnection available, but at a cost outlined in the MISO DPPS studies, that cost should be properly allocated to the project developers and not Minnesota ratepayers.

B. MAGNETIC AND ELECTRIC FIELD CALCULATIONS ARE UNDERSTATED

i. Projected magnetic fields are grossly understated.

The EIS must include a correct chart of magnetic fields at the various distances shown in the Application and Appendix S**.** This correction must show the full range of potential magnetic fields, up to the full 3.585 MVA capacity of the project.

Over the years, the Commission and Dept. of Commerce have consistently refused to address the range of magnetic fields likely to be associated with any transmission project. This is a significant fail of environmental review. This issue has been raised repeatedly by this writer as an individual and in the course of representing clients – raised in comments, testimony, and evidence -- I've lost my patience. There is no excuse for this continued failure to address the full range of potential magnetic fields. Although Minnesota application requirements do not require disclosure of the potential magnetic fields based on the design specification of capacity (MVA), which in this case is 3,585 MVA, the state of Wisconsin does require disclosure. There is no prohibition of disclosure of this important fact, and the Department and the Commission should require it. See Draft Scope, 3.1 "Public Health and Safety," an admission that electric and magnetic fields are a Public Health and Safety issue.

The modeled magnetic fields shown in the application are grossly understated by roughly a factor of five. Application Ch. 7, 7.3.2.3 (p. 163, or 183 of pdf).

The application, Table 5-1, page 87, shows the Capacity (MVA) for the Double-Circuit 345kV line – a disclosure which should be repeated in the Application and Appendix S regarding electric and magnetic fields. From page 87 of the application:

The following table provides a general comparison of the capacity of transmission lines operated at different voltages assuming the same current of 3000 Amps.

Table 5-1
Comparison of Capacity by Voltage Level

Voltage Level	Capacity (MVA)
69 kV	358.5
115 kV	597.6
230 kV	1195.1
345 kV	1792.7
Double-Circuit 345/345 kV	3585.4
500 kV	2598.1
765 kV	3975[77]

On page 162 of the application, Xcel states the "System Peak Energy Demand" as 718 and 692 MVA. These figures are the highest stated in the Application:

The projected magnetic fields for different structure and conductor configurations for the Project are provided in **Table 7-19**. Graphs showing the calculated magnetic fields for the configurations listed in the table are included in **Appendix S**. Because magnetic fields are dependent on the current flowing on the line, magnetic fields were calculated for two different estimated typical system conditions during the Project's first year in service (2030). These two scenarios are: (1) System Peak Energy Demand and (2) System Average Energy Demand. The "System Peak Energy Demand" current flow (estimated loading of 718 MVA from Wilmarth to North Rochester and 692 MVA from North Rochester to Tremval, station beyond the Minnesota border) represents the current flow on the line during the peak hour of system-wide energy demand. The "System Average Energy Demand" current flow (estimated loading of 331 MVA from Wilmarth to North Rochester and 334 MVA from North Rochester to Tremval, station beyond the Minnesota border) represents the current flow on the line during a non-peak time (winter months) when there are high levels of wind generation and the transmission system is intact (i.e., no outages).

Oh, please, give me a break…

FULL DISCLOSURE: Obviously I'm not an engineer!

Below is a table calculating magnetic fields, using the "System Average Energy Demand" of 443 MVA (no disclosure of amps). What I don't know is whether for a double circuit the amperage is doubled or some other value, i.e., 6006.53 peak amps, or ??. Anyway, here's an attorney's guess – PROVE ME WRONG!

ADJUSTABLE TABLE

TABLE 5.2-6. Calculated Magnetic Fields (milligauss) for proposed double circuit 345 kV Transmission Line Designs (3.28 feet above ground)

STRUCTURE TYPE	SYSTEM CONDITION	CURRENT (AMPS)	DISTANCE TO PROPOSED CENTERLINES -300'	-200'	-100'	-75'	-50'	-25'	0'	25'	50'	75'	100'	200'	300'
1 CIRCUIT	PEAK	3000.00	8.98	18.98	63.86	98.86	163.18	266.48	362.39	338.18	203.64	115.80	71.14	18.75	8.18
DELTA CFG	AVERAGE	554.00	1.65	3.51	11.78	18.27	30.15	49.19	66.90	62.45	37.62	21.39	13.15	3.47	1.51
1 CIRCUIT	PEAK	3000.00	9.77	22.39	80.91	126.14	206.48	311.93	290.34	182.27	112.05	72.84	50.23	16.82	8.07
VERT CFG	AVERAGE	554.00	1.82	4.14	14.94	23.32	38.11	57.61	53.61	33.66	20.69	13.46	9.26	3.09	1.47
2 CIRCUIT W/	PEAK	3000.00	8.07	16.82	50.34	73.07	112.39	182.84	291.14	312.50	206.59	126.14	80.80	22.39	9.77
1 CKT ACTIVE	AVERAGE	554.00	1.51	3.12	9.29	13.50	20.76	33.77	53.75	57.71	38.15	23.28	14.90	4.14	1.82
2 CIRCUIT W/	PEAK	3000.00	2.16	6.59	37.73	69.09	135.91	260.23	341.25	262.05	137.50	70.11	38.52	6.70	2.16
2 CKTS ACTIVE	AVERAGE	554.00	0.39	1.23	6.98	12.76	25.11	48.07	63.01	48.39	25.39	12.97	7.12	1.23	0.42

ENTER MVA BELOW TO ADJUST CURRENT IN THE TABLE:	
3585.00	MVA PEAK
345.00	kV
1.73	3 Phase
6006.53	Amps PEAK CALC'D
334.00	MVA AVERAGE
345.00	kV
1.73	3 Phase
559.60	Amps AVERAGE CALC'D

What is clear is that the 3,585 MVA is roughly FIVE TIMES more than Xcel's highest claim of "System Peak Energy Demand" of 718. If "System Peak Energy Demand" is 718 MVA, according to Table 5.1, a single circuit 230kV line would be sufficient!!! That's something, as above, to be considered in evaluating possible system alternatives.

Each table in 7-19 and Appendix S must be updated/corrected with independent verification to show the capacity used for each row (MVA), to include calculated magnetic fields up to Amps and MVA shown by Applicant in the Application Table 5-1, 3,000 amps and 3,585.4 MVA. Again, Xcel's highest MVA used for the magnetic field charts is just 718 MVA. This is based on a quick look at information provided by the Applicants. The estimates based on Table 5.1 show that the magnetic field calculations are off by roughly a factor of FIVE. The Dept. of Commerce-ERA and the Commission should know better than to accept such obviously off statements given its "expertise[2]."

[2] Not that agency "expertise" is sufficient to avoid scrutiny! See Loper Bright Enterprises v. Raimondo, Secetary of Commerce, et al., No. 22-51, S.Ct., June 28, 2024 (online at https://www.supremecourt.gov/opinions/23pdf/22-451_7m58.pdf)

ii. Are electric field calculations as understated as those for magnetic fields?

The EIS must provide independently verified calculations of electric fields at expected distances with consideration that farming, hunting, and other activities may occur under the conductors and within the right of way.

C. SOCIOECONOMIC IMPACTS OF ALL SORTS MUST BE EVALUATED

Socioeconomic impacts are more than those easily quantifiable. Review should include:

Payment of increased utility personal property tax that can influence a local government's position on the project. This is an issue often raised historically by Xcel on proposing a project, but then, after a project is build and operating, Xcel has a history of doing everything it can, using every possible venue, to cut that tax, leaving local governments with a gutted revenue base and scrambling to make it up.

Impact of the project, if built, on landowners' property values and marketability.

Temporary and long-term loss of agricultural production, based on data from past transmission projects, must be included in analysis of socioeconomic impacts.

D. IMPACT ON VISUAL, AESTHETIC, AND USE AND ENOYMENT OF PROPERTY

The EIS must consider the visual and aesthetic impacts and detriments to use and enjoyment of property. This transmission project has impacts that threaten visual and aesthetics of specific properties and of communities. Impacts to specific landowners can also include loss of use and enjoyment of their land. Loss of use and enjoyment applies to those on greenfield routes and those on routes sharing existing Rights of Way here there would be an increase of impacts. Loss of use and enjoyment also applies to those threatened with a new or expanded corridor and route across their land, as it affects how they feel about their property and their future and also it affects whether their property is marketable and its marketability during and after review of the project and potential construction.

The EIS must consider these impacts particularly to those many landowners and communities making comments who have already been through this process with the threat or reality of construction of CapX 2020. The threat of these projects has a significant impact on those many landowners on the notice list, and those not included but affected.

E. ENVIRONMENTAL IMPACTS OF GREENFIELD VERSUS SHARING RIGHT OF WAY MUST BE EVALUATED

The State of Minnesota has a "non-proliferation" policy, weighing towards sharing of right of way and using existing corridors. This policy of "non-proliferation" was established by People for Environmental Enlightenment and Responsibility (PEER) v. Minn. Environmental Quality Council, 266 N.W.2d 858 (Minn. 1978). The EIS must weigh impacts using the guidance provided in PEER.

F. THE EIS MUST ADDRESS THE RISKS AND WISDOM OF SITING TRANSMISSION OVER THE CENTERPOINT NATURAL GAS WELL.

The Xcel application was improperly accepted as complete. There is no mention of the massive underground storage facility under 13+ square miles centered on Hwy 13 just south of Waterville, north of Waseca**. No amendment has been made to the application disclosing this large energy infrastructure.**

The EIS must include identification of the portion of the proposed route and alignment that traverses a DNR permitted natural gas storage dome in the area depicted on the Map 8 of Segment 1. The EIS must also identify the two natural gas pipelines in Segment 1 that are deceptively referred to by Xcel as "hydrocarbon" pipelines. Application, page 201. This area circled in Segment 1, initial Map 8, must be removed from the proposed transmission route:

The Prehn family home and acreage has been in the family for over a century. It sits directly on top of the dome, across Highway 13 from the (now) CenterPoint pumping station and water treatment center. Their address is **43497 East Hwy. 13, Waseca, Minnesota 56093**, on Hwy. 13 between 430th and 440th. From the top of the map, their home is in the center between these east/west roads. Their driveway is in the woods between the 2nd and 3rd "13" on aerial map below, and a second access is seen across the north end of the field just south of their woods.

Prehns raised Xcel's omission of the natural gas storage dome in early comments, but the application has not been amended. Prehns also raised Xcel's transmission plan with the route going over the gas dome and CenterPoint staff at the site did not know of Xcel's plan. Xcel did inform CenterPoint of its plan in a May 1 2024 meeting. CenterPoint informed Xcel of locations of gas wells within Xcel's proposed transmission corridor. From Xcel's Reply Comment:

> With respect to identification of the underground natural gas storage and associated natural gas facilities in Project maps, publicly available pipeline and infrastructure data was used in the filed Application detailed maps in Appendix K.[8] The Applicant completed additional review and contacted CenterPoint for additional information of this storage site and will continue to work with CenterPoint on any mitigation measures that may be needed. The Company is providing a revised version of Segment 1, Map 8 from Appendix K as Attachment B to these Reply Comments to indicate the location of the CenterPoint facility. The Applicant notes that it has extensive experience working with natural gas companies and other pipeline companies on evaluating and implementing AC mitigation when transmission lines cross or are located parallel to pipelines, which is a relatively common occurrence throughout the system.

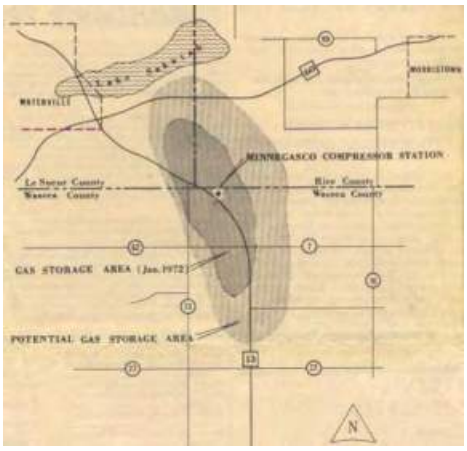
In its subsequent May 6, 2024, comment, Xcel stated:

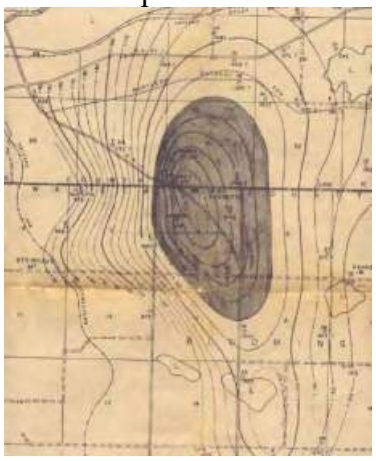
> The Company is aware of the CenterPoint underground gas storage facility and is coordinating with CenterPoint concerning the location of the Project and any necessary mitigation. The CenterPoint facility is used to store natural gas during the summer and to withdraw gas in the winter heating season with gas stored several hundred feet below ground in the Mount Simon Sandstone formation.
>
> On May 1, 2024, Company representatives met with CenterPoint staff to discuss the proposed Project and the CenterPoint facilities in this area. The proposed routes were discussed, as well as the 150 foot wide easement needed for the proposed 345 kV transmission line. The Company indicated that typical foundations for the proposed 345 kV transmission line structures range from 40-70 feet in depth, depending on site-specific soil and geologic conditions, and CenterPoint noted that these would have no impact on the underground storage facility, which is located several hundred feet underground.
>
> CenterPoint noted that the proposed Segment 1 South, Route Alternative 1L is near four wells associated with their facilities (see revised Segment 1, Map 8 attached to these Supplemental Comments which shows wells within 500 feet of the proposed centerline) and indicated that it requires a minimum clearance of 70 feet above each well for access and maintenance work. CenterPoint also noted that, while unlikely, transmission lines crossing over valve sites could experience flashing in the event of a natural gas venting release.
>
> The Company will continue to coordinate with CenterPoint to ensure that the proposed routes and transmission structures are adequately set back from the existing wells, valves, pipelines, and associated facilities to avoid any potential impacts. Additionally, the Company will work with CenterPoint to evaluate the need for potential AC mitigation.

May 1, 2024!! It's about time Xcel met with CenterPoint staff, informed them of this project, and learned about the wells and monitors dotting the countryside and potential impacts of transmission.

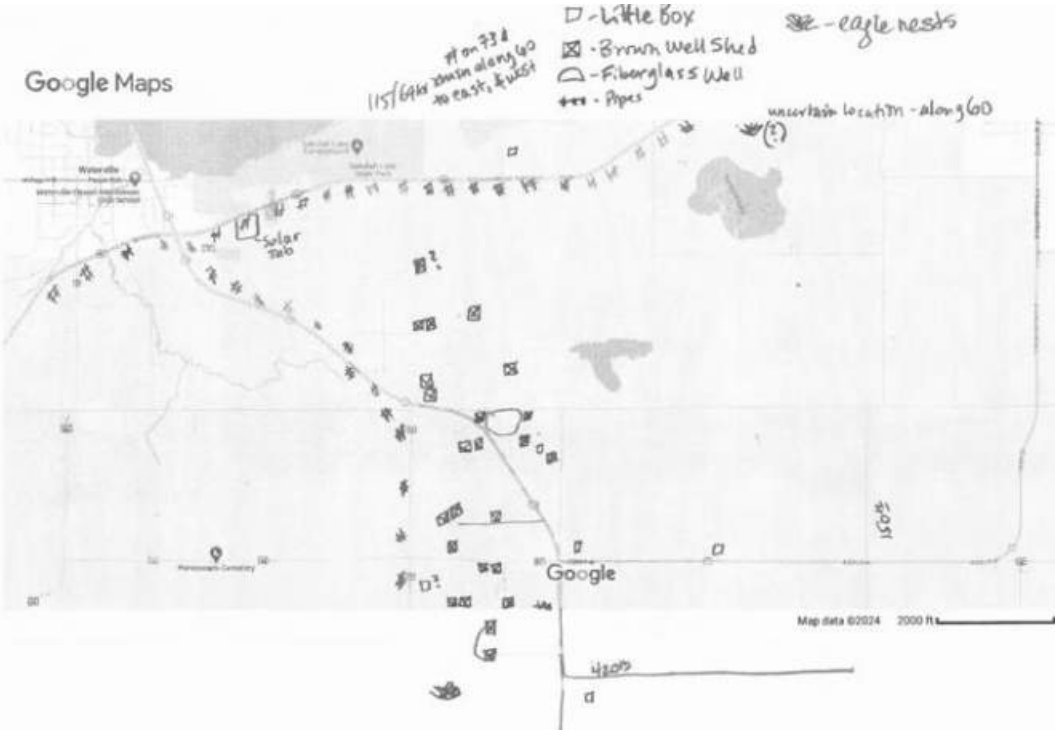
Xcel states that it has marked on its April 2024 revised map gas wells within 500 feet of the proposed line, identifying those wells with a black dot, but this writer cannot see any black dots on the map. Further, on April 2-24 Revised Segment 1 Map 8, there is no depiction of the extent of the natural gas storage dome, which is loosely represented by the yellow circle above and below. Xcel's revised map does show a large red dot at the CenterPoint office and water treatment plant along Highway 13, but again, that is just the office and water treatment facility, and not the gas dome. There is no depiction of the extent of the 13.25 square mile natural gas storage dome. By any measure, it's major infrastructure and should be shown on the map.

A map from the initial DNR permitting of the underground storage was included in the initial Prehn comment, and Xcel had the opportunity to review and mark it on its Segment 1 Map 8 map, and this was not done. These maps are from the mid-60s and 1972. The underground storage was expanded post 1972. I'd guess CenterPoint would provide a current map.

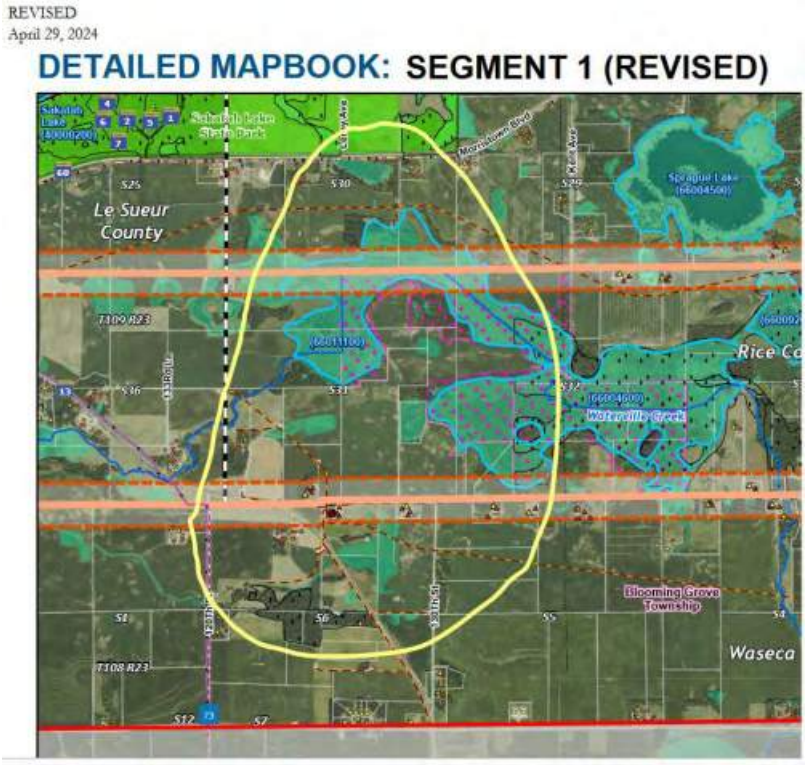




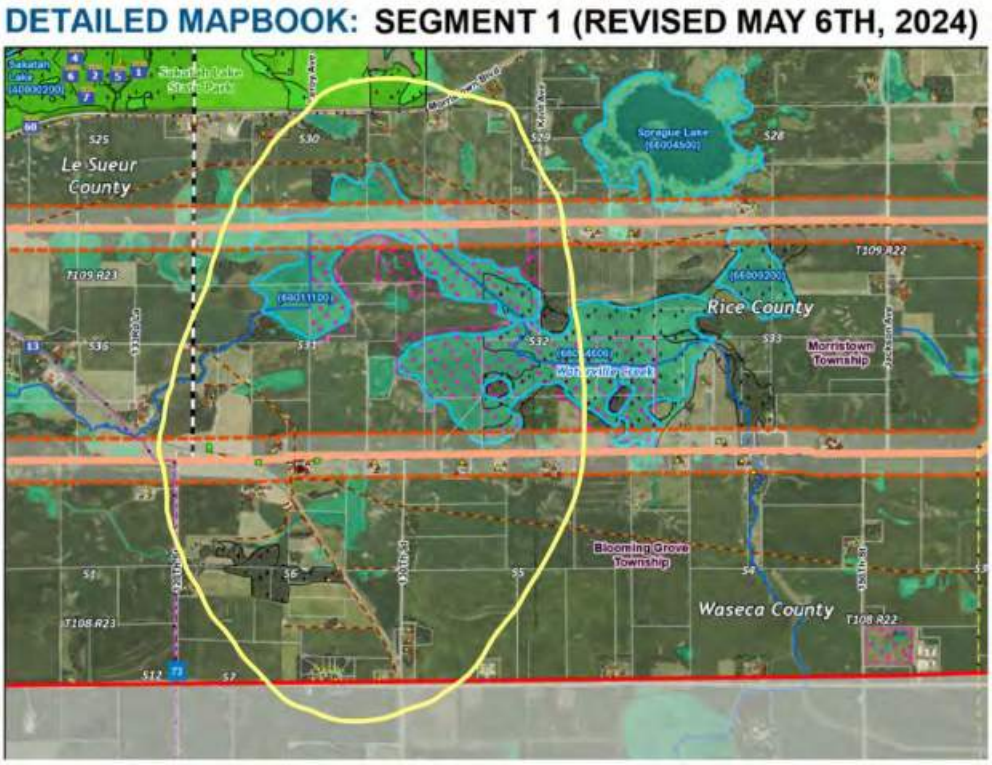
This, is the very rough map compiled by the Prehns in an afternoon of area reconnaisance:



This is the Xcel's April 29, 2024 map with this writer's approximation of the dome boundary:



The May 6 revised map does show wells with green squares, but there are no wells marked on the northerly route, and there may well be some there. Again, there's no depiction of the gas dome, again with this writer's rough approximation of the dome boundary:

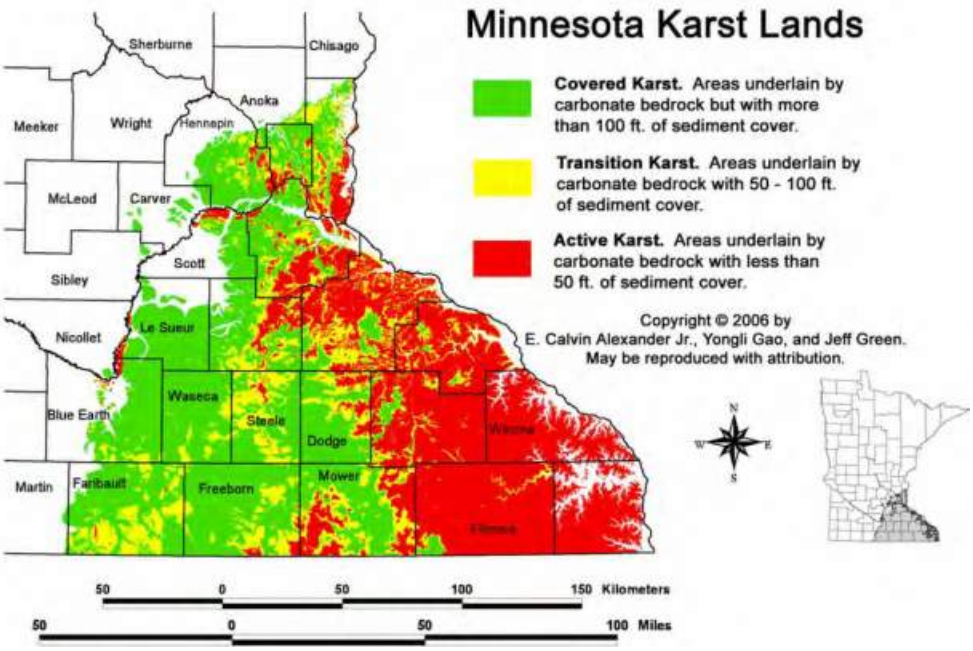


Because Xcel did not meet with CenterPoint until May 1, 2024, because it neglected to disclose the natural gas dome in its application, did not disclose wells in its first map revision, and has yet to show the extent of the natural gas dome in any of it maps, the Prehns, who have been living with this gas dome since the 60s, are not confident that Xcel recognizes the most basic facts of the gas dome, much less potential impacts. The Commission may "know all about it," but if so, should have known the application was incomplete without any mention of it, and should have required Xcel update its application. This should not be left for the evidentiary hearing.

The EIS, with the help of CenterPoint and the Prehn's map as guidance, must show the full extent of the CenterPoint natural gas dome on a map, the office and water treatment plant, and all of the wells and monitors in both of the routes, with particular designation for those wells and potentially affected areas and document its understanding of potential impacts.

G. ACTIVE KARST IS IN THE S.E. AREA PROPOSED FOR THIS PROECT

The EIS must map the active and transitional karst areas in the corridors where transmission structure foundations could be unstable[3].

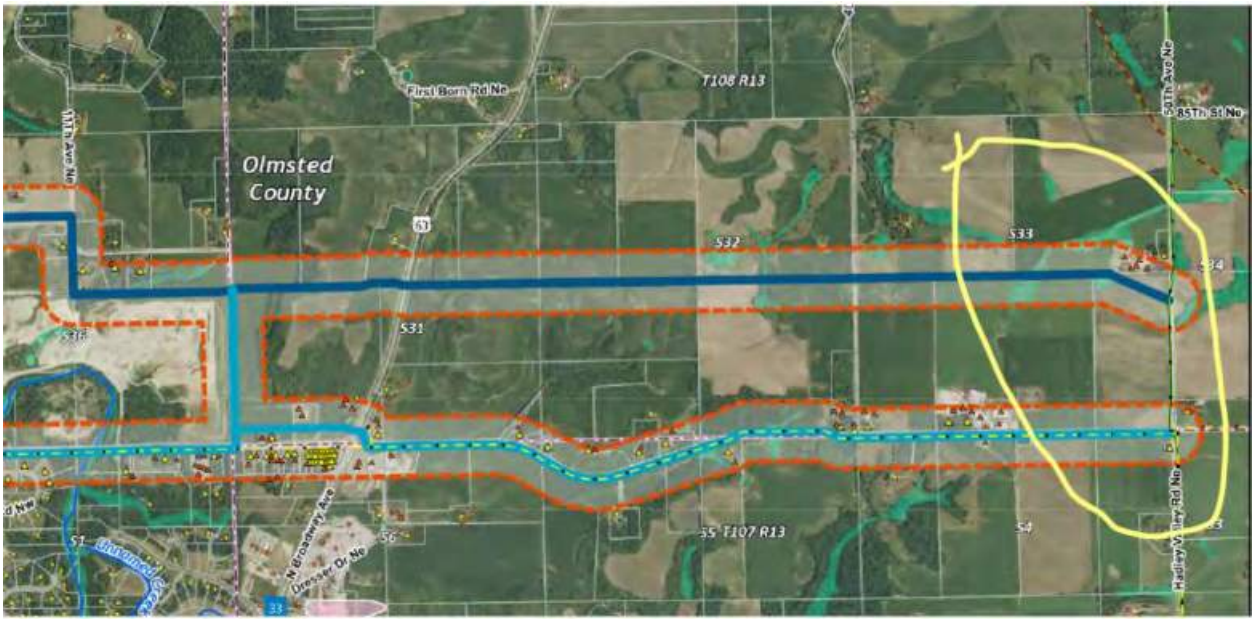


H. THE EASTERN ENDPOINT OF THE CHESTER LINE MUST BE DISCLOSED

The EIS must disclose where the eastern end of the project extends beyond what is shown on the maps, which is two routes/corridors stopping at Hadley Valley Road N.E./50th Avenue N.E. where there is no substation or terminus of any sort. How the project transitions beyond what is on that map may well have, should have, an impact on what route is chosen. If a route is chosen without regard for how the line is routed beyond the map, it will lock that eastern "beyond" section of the 161kV project into a route that is not feasible or not recommended. The

[3] https://stormwater.pca.state.mn.us/index.php?title=File:Minnesota_karst_lands.png

Commission cannot make an informed decision without the remainder of the 161kV project in the record.



I. SYSTEM AND ROUTE ALTERNATIVES OFFERED

At the Pine Island hearing on July 9, 2024, Steve Hackman, of the North Route Group, offered specific system and route alternatives for the Chester 161kV line which should be reviewed in the EIS.

It is my understanding that Mike Chase, of CFERS, will also offer route alternatives for Segment 2 along established corridors which should be reviewed in the EIS.

As a system alternative, the no-build option should be evaluated in consideration of the four transmission projects proposed, as above, and in light of the MVP 3, 4, and 5, heading eastward from southern Minnesota into Wisconsin.

As a system alternative, a lower voltage option should be reviewed based on Xcel's claimed peak system demand MVA of 718, Application page 162.

No CapX 2020 and the Prehn Family offer these scoping comments, and look forward to the Draft Environmental Impact Statement. We may offer additional scoping comments before the August 1, 2024 deadline.

Very truly yours,

Carol A. Overland

Carol A. Overland
Attorney for the Prehn Family and NoCapX 2020

From: Joel Peters
To: Davis, Richard (COMM)
Subject: Alternative Route: Mankato - Mississippi Transmission Line
Date: Wednesday, July 31, 2024 1:16:46 PM
Attachments: Transmission Line - Suggested Alternatives - 07.31.24.pdf

Rich

I also submitted this letter through the public comment section of the Commerce page.

Please see the attached letter suggesting alternative routes affecting our owned property along Segment 1, route south of the Mankato - Mississippi River Transmission Project.

We welcome the opportunity to work together to find a good solution that does not further burden our commercial property along Hwy 14 in Mankato.

Thank you for your time and consideration.

JOEL PETERS
VP, REAL ESTATE
TEL: 952-873-4865
CEL: 612-669-0862
805 Enterprise Drive East Belle Plaine
MN 56011 United States

From:	eera.admin_no_reply@state.mn.us
To:	Davis, Richard (COMM)
Subject:	Public Comment re: Mankato to Mississippi River Transmission Project
Date:	Wednesday, July 31, 2024 1:15:50 PM
Attachments:	Transmission Line - Suggested Alternatives - 07.31.24.pdf

Mankato to Mississippi River Transmission Project

Submitter Name: Joel Peters

Submitter Email: joel.peters@cambriausa.com

Submitter Telephone: (612) 669-0862

Comment:
Please see attached letter outlining alternative routing for Segment 1, 1 south transmission line of the Mankato-Mississippi River Transmission Project

Submit Date: 07/31/2024 06:13 PM

Minnesota Department of Commerce
Energy Environmental Review and Analysis
85 7th Place East, Suite 500
Saint Paul, MN 55101-2798

Re: Alternative Route for Mankato-Mississippi River Transmission Project, Segment 1: Mankato to Faribault

To Whom It May Concern,

Please find the suggested alternative transmission line route for the Mankato-Mississippi River Transmission Project, Segment 1: Mankato to Faribault. For the avoidance of doubt, please see "**Exhibit A: Segment 1: Mankato to Faribault**" showing the applicant's proposed routing.

Please find the applicable evidence and rationale to meet the five stated criteria for alternates:

- Criteria #1
  - #1-1: Describe Anticipated Impact
  - #1-2: Provide an Alternative Site Route
  - #1-3: Explanation of Why Alternative Mitigates the Impact
- Criteria #2
  - Submission by August 1, 2024
- Criteria #3
  - Suggestion is located outside prohibited areas
- Criteria #4
  - Suggestion is able to meet the applicant's stated need for the project
- Criteria #5
  - Suggestion is feasible

Thank you for the opportunity to participate in the planning of this project and your willingness to gather feedback from impacted stakeholders.

Respectfully,

Joel Peters

Joel Peters

Davis Family Minnesota LLC

Summary of Alternative Route

The applicant has proposed a transmission line that crosses the southeast corner of owned commercial property adjacent to Hwy 14. This potential transmission right of way will cause excessive visual disinterest of the area and destroy the usable area of the owned property.

The owned property already competes with two electrical distribution easements on the east and the west of the property. To add a third, major, transmission easement will only add more pollution to the area and erode the commercial desire of the property.

In the EERA's manual labeled "*How to Suggest Alternative Power Plant Sites or Transmission Line Routes*", the author suggests that an "alternative suggestion based solely on personal preference will not be carried forward (p.3)". However, to some degree, personal preference must be a consideration in such an endeavor as impactful as a new transmission line. Citizens and community stakeholders made investment prior to this project and those decisions are based on personal preference. One personal preference is to NOT have substantial disruption from utility infrastructure. EERA staff needs to consider a routing that mitigates these impacts, even if personal preference in nature, and ultimately preserve the community's previous decisions to live free of infrastructure pollution.

Therefore, the EERA must consider a calculus of overburdening a specific property/area with too much electrical infrastructure. This overburdening occurs on the owned property and is described in Exhibit B-1. The personal decision to purchase the commercial real estate was to have good visibility from the highway and a welcome presence for community members, not to become a pseudo electrical substation.

Enclosed are two alternative routes for this transmission route project. One alternative is a route proposed by the applicant and the second route directs the transmission to south of the Eastwood substation.

If connectivity to the Eastwood substation is required, then EERA should consider expanding the southern boundary of the project study to allow for a less disruptive transmission route. The southern boundary of the project study is tight to the Eastwood substation, forcing the applicant to maneuver commercial real estate, state highway infrastructure and private improvements. By expanding the study area, this would allow for a less invasive approach by the applicant.

Criteria #1-1: Description of Anticipated Impact

The subject of concern is the proposed Route 1 South, at Segment 1: Mankato to Faribault. Specifically at north/south crossing across HWY 14.

Route 1 would destroy the usable area of the owned property (**Exhibit B-1: Impact on Owned Property**). Distribution lines on the east and west of the property already encumber the owned property (**Exhibit B-2: Existing Impacts on Owned Property**).

Based on the July EIS Scoping Meetings, the new transmission lines along Segment 1 will require a 150' ROW. This 150' ROW, including the existing encumbrances of the site will destroy the approved development of the site**.** The southeast corner, already encumbered by distribution lines, is the primary area of the property offering maximum visibility and connectivity to HWY 14. This proposed

infrastructure installs further encumbrances and can be re-routed to have fewer environmental impacts on this expanding corridor of HWY 14.

Route 1 South would drastically erode the economic value of the property and eliminate the desirable features of the site, mainly the proximity and visibility to HWY 14

Criteria #1-2: Alternative Route

Alternative Route #1: The simple alternative route is to use the already proposed 1 North route identified in **Exhibit A.**

Alternative Route #2: If a south route is required along Segment, then the applicant can be directed south out of the Eastwood substation, then turn east along Madison Ave/216th, turn north up 594th Ave. to cross Hwy. 14 and then tie back into the remaining segment 1 station. See **Exhibit C: Alternative Route #2**

If connectivity to the Eastwood substation is required, then EERA should consider expanding the southern boundary of the project study to allow for a less disruptive transmission route. The southern boundary of the project study is tight to the Eastwood substation, forcing the applicant to maneuver commercial real estate, state highway infrastructure and private improvements. By expanding the study area, this would allow for a less invasive approach by the applicant.

Criteria #1-3: Explanation of Why Alternative Mitigates Impacts

Alternative Route #1 is already a proposed route, however it mitigates the environmental pollution caused by distribution towers and power lines on a site already burdened by excessive distribution lines.

Alternative Route #2 directs the transmission route along a different route with less congestion of existing infrastructure. It allows the applicant to tie into the remaining Segment 1 with no further disruption.

Criteria #2: Submission of Alternative on Time

This alternative route suggestion was submitted during the environmental review period and prior to the deadline of August 1, 2024.

Criteria #3: Alternative Avoids Prohibited Areas

The suggested alternative routes avoid prohibited areas of transmission lines. Neither option is located in a national park, state park, or state scientific and natural area.

Criteria #4: Alternative Meets Applicant's Need

Both alternative routes meet the applicant's need as both options allow for the continuation of the power. There is no distribution to the connectivity of the transmission line, just different route.

Criteria #5: Demonstration the Alternative is Feasible

Please see Exhibit D: Feasibility Map. Both suggested alternative routes are practical and logical. Using the "common sense" test, Alternative Route #2 is slightly longer than the applicant's proposed route, however, there are fewer obstructions and electrical infrastructure to compete with.

The EERA should consider the total visual pollution caused by this type of infrastructure. If you overload an area, as does the applicant's proposed route, the environment turns to undesirable and unattractive.

Exhibit A: Segment 1: Mankato to Faribault

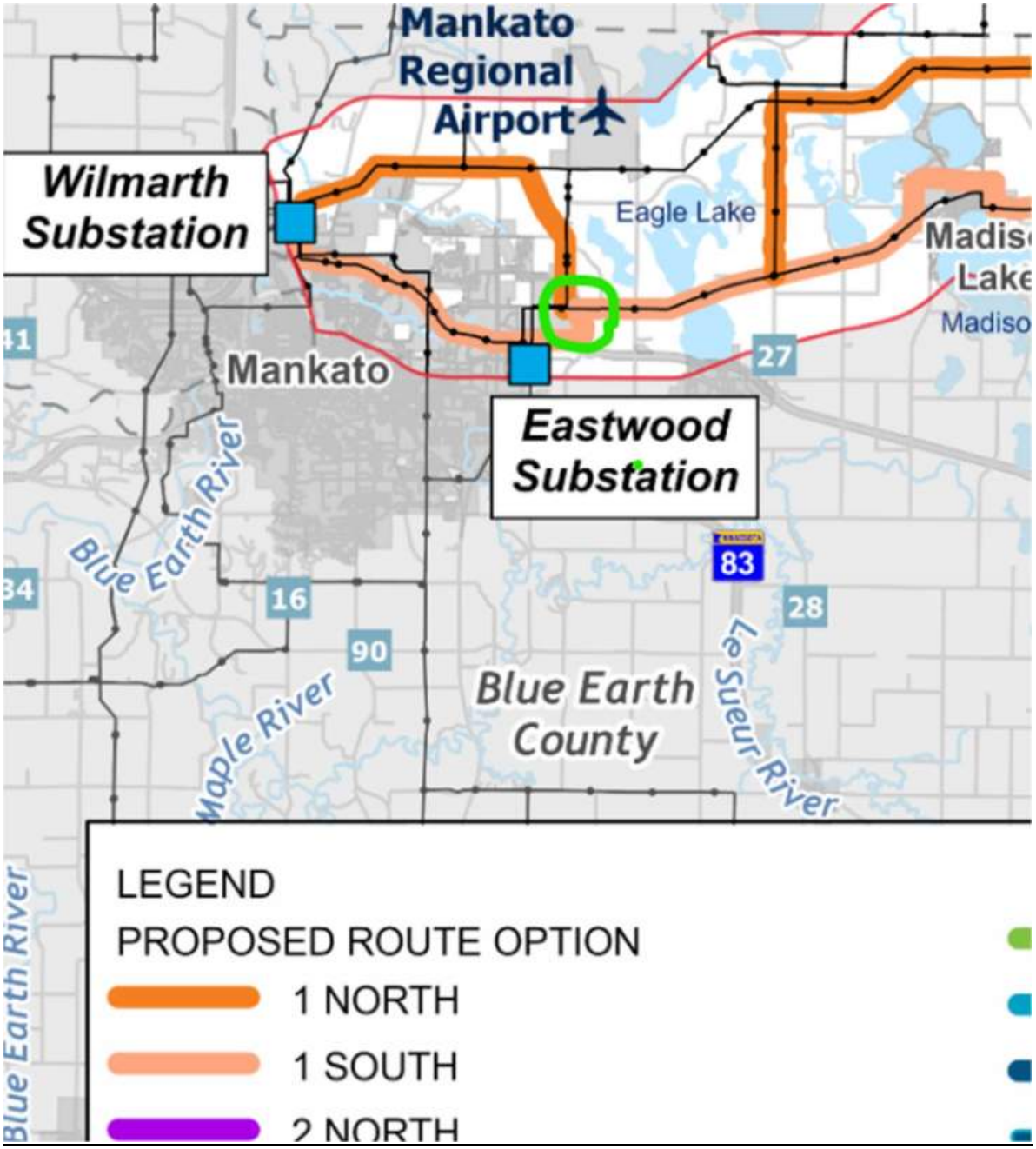


Exhibit B-1: Impact on Owned Property

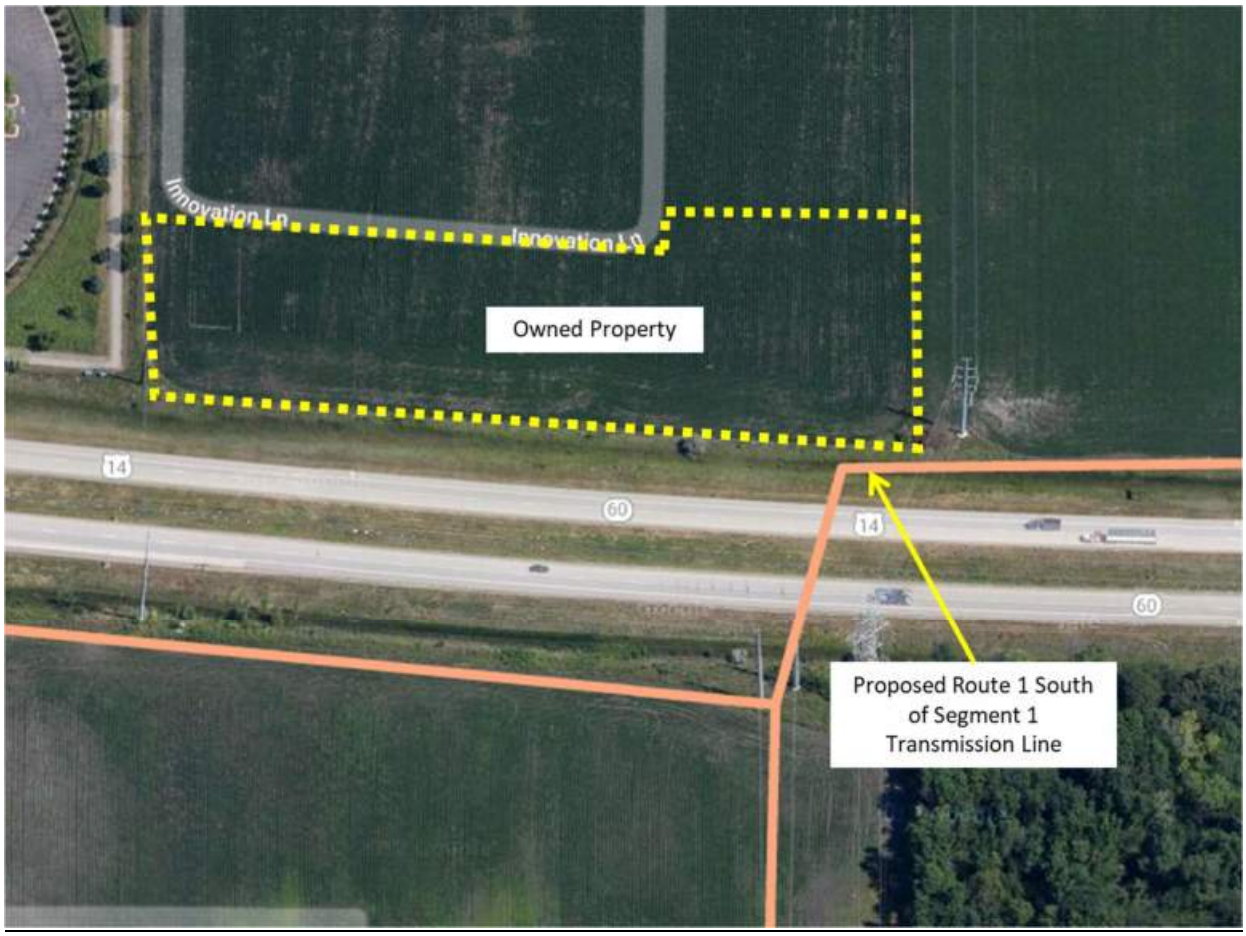


Exhibit B-2: Existing Impacts on Owned Property

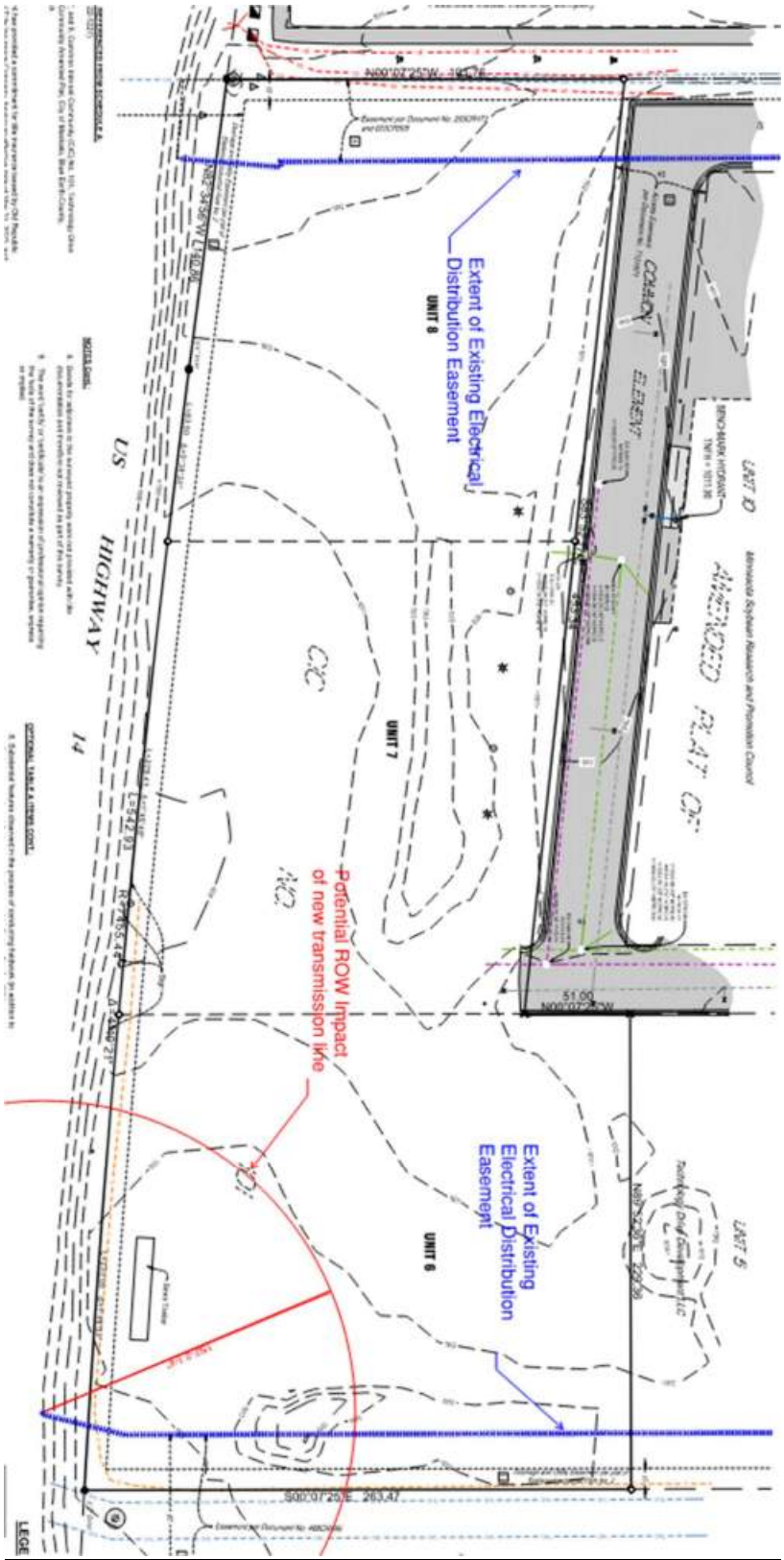
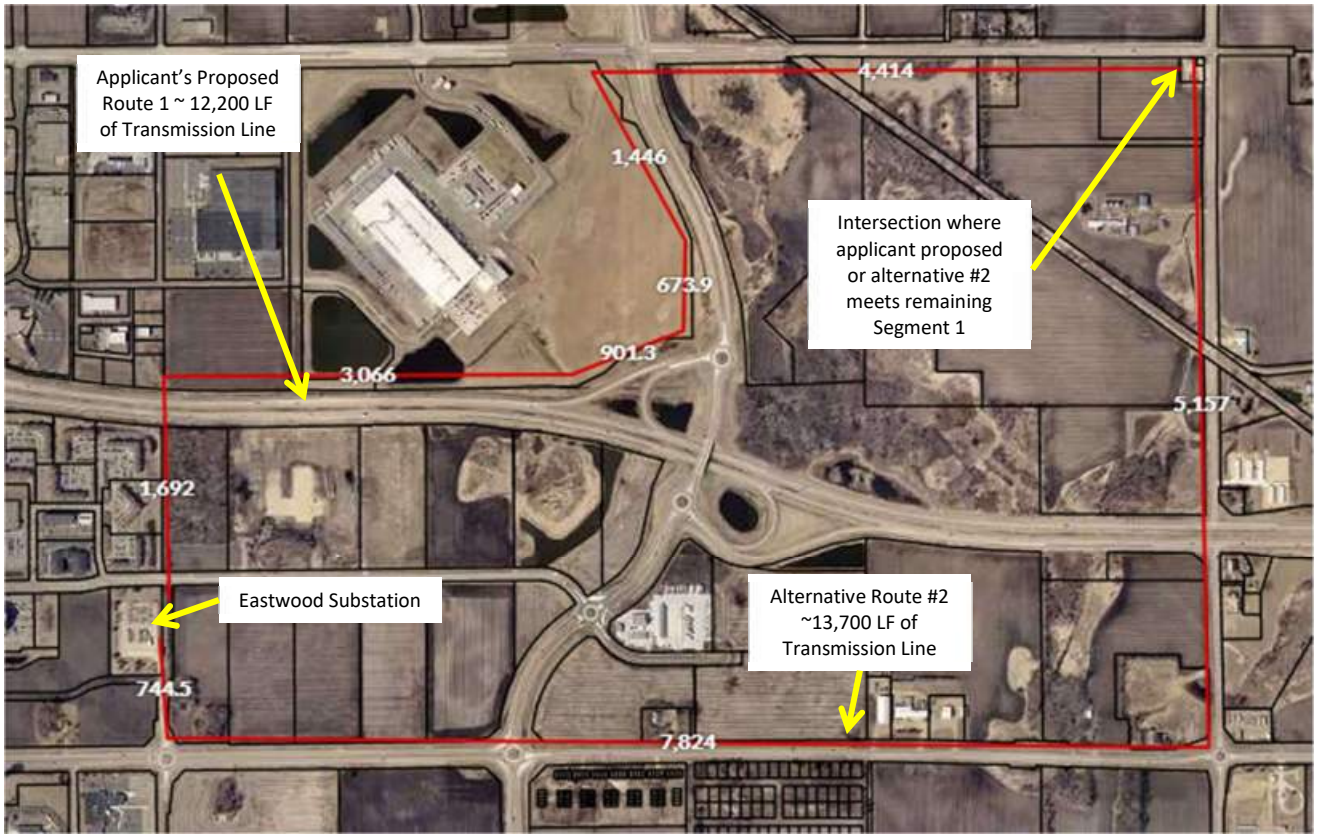


Exhibit C: Alternate Route #2

Exhibit D: Feasibility Map



From: Wufoo
To: Staff, CAO (PUC)
Subject: Submitted Public Comment Form
Date: Monday, July 29, 2024 4:15:55 PM

Name *	GERALD RAUSCH
Address	☐ 212 DIAMOND CREEK ROAD (OLD ADDRESS :46578 CEDAR CIRCLE CLEVELAND MN 56017) MANKATO, MN 56001-6217 United States
Phone Number	(507) 340-4416
Email	donger.33g@gmail.com
Provide the docket's number.	E002/CN-22-532,E002/TL-23-157

Leave a comment on the docket. *

IFTHE NORTHERN ROUTE CHOSEN ,THAT WOULD SERIOUSLY AFFECT MY PROPERTIES. I AM CONCERNED ABOUT THE SAFETY OF OPERATING OUR LARGE FARM EQUIPMENT AROUND MORE OF YOUR UTILITY POLES. I AM DEEPLY CONCEREND ABOUT THE HAZARDNOUS AFFECT OF THE "MAGNETIC FIELD" ON OUR HEALTH WHILE WORKING NEAR THE 345KV LINE AND ALSO THE PEOPLE LIVING IN THE HOME ON THE BORGMIER PROPERTY. WHEREAS THE CITY OF MANKATO KEEPS EXPANDING IT WOULD APPEAR TO BE MORE WISE FOR EXCEL TO MOVE FURTHER NORTH.BUT I BELIVE IT WOULD BE A BETTER PLAN TO USE THEIR EXISTING SOUTHERN ROUTE ALONG HIGHWAY 14. IT WOULD BE A SHORTER DISTANCE TO THE SUB STATION AND TO THE ROUTE GOING EAST.THAT ROUTE WOULD NOT REQUIRE COSTLY AQUISISTION OF NEW RIGHT OF WAY. A MUCH BETTER PLAN. SINCERELY GERALD F. RAUSCH PS: PLEASE UPDATE OUR ADRESS TO : 212 DIAMOMD CREEK ROAD MANKATO, MN 56001-6217

From: Corey Schwartz
To: Davis, Richard (COMM)
Subject: 22-532/23-157 Scoping Comment
Date: Wednesday, July 31, 2024 1:58:49 PM
Attachments: image.png
image.png

Hi Richard,

I am from Waterville and have concerns about segment 1 along the southern route option. It runs along the southern border of our property in Le Sueur County and right through the middle of 3 of our parcels in Rice County. Specifically in Rice County, it runs through a wetland and woods that I own with my 2 brothers and uncle. I highlighted in yellow and circled it in blue where the transmission line would be. This area is home to a lot of wildlife. The red circles are where sandhill cranes nest every spring and the green circles are known nesting areas for great horned owls. We would hate to see their habitat affected by this new line. It would also run right along Waterville Creek which is one of the DNR's protected streams and rivers. We hunt this area every year and a line running through the middle of it affects the habitat for many species of animals and greatly affects the enjoyment of the land we have known for many years.

In Le Sueur county it would run on the southern border of 3 more of our parcels. (highlighted and circled in blue). This route would affect potential building sites on these 3 parcels and drastically limits you as to where you could build with a large transmission line like this on these parcels. We already have a cell phone tower on the northern edge of parcel number 14.025.7600 (circled in green). Also, there is already an existing transmission line that runs along Hwy 60 on the northern edges of these 3 parcels (highlighted and circled in blue). I would like to build a house out here someday but with this new potential line coming through I don't know that there is a feasible way to do so. Our options are already limited with the existing transmission line to the north and the cell phone tower as well.

I would suggest using the proposed north route instead of the south route. There is already an existing transmission line there and I believe that route would be less impactful to the environment and the people along it.

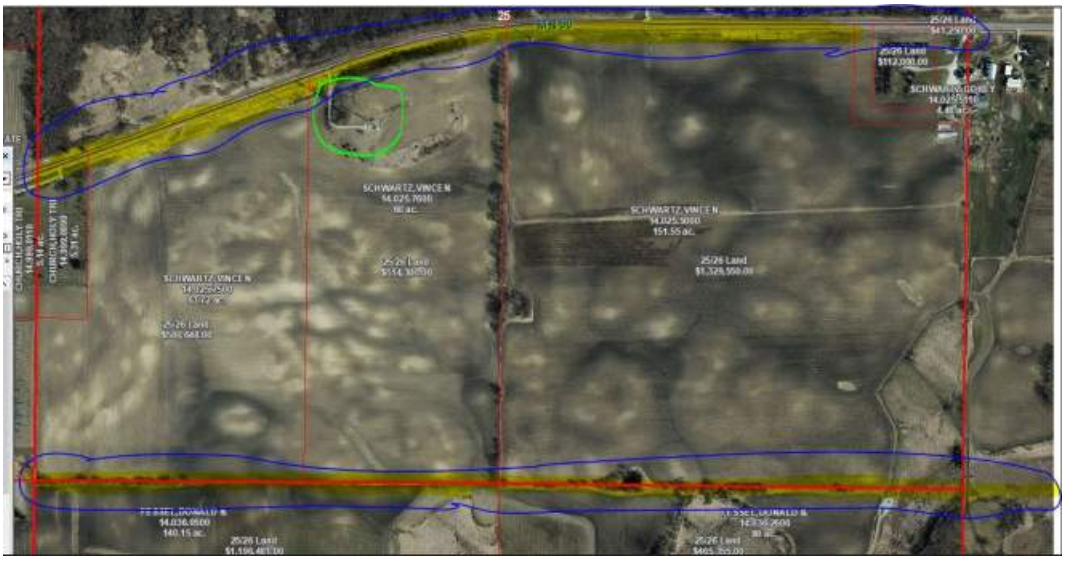
I only ask that you consider all of these things when making a decision. This farm has been in the family for generations and we would like to preserve it as best as we can. I really appreciate your time and effort in all of this. Please reach out to me with any questions you may have or if you would like more information. Below are the maps I was referring to. Could you please let me know that you got this message if it's not too much trouble?

Thank you,

Corey Schwartz

Rice County Map:

Le Sueur County Map:



From: eera.admin_no_reply@state.mn.us
To: Davis, Richard (COMM)
Subject: Public Comment re: Mankato to Mississippi River Transmission Project
Date: Monday, July 22, 2024 6:32:16 PM

Mankato to Mississippi River Transmission Project

Submitter Name: Joyce Schulz

Submitter Email:

Submitter Telephone:

Comment:
I am writing this comment to express my strong opposition to this project. I am a lifelong resident of Faribault and have lived on my farm on 227th Street E in Faribault for almost 60 years where my husband and I raised our 6 children. My farm is on proposed route 2 NORTH. High Voltage lines such as the 345 Kilovolt lines proposed in this project ARE a health risk for the residents, animals, and the environment. High Voltage lines emit Electric and Magnetic Fields which are not good for humans. There are no current federal regulations regarding allowable EMF and the State of Minnesota does not even report an amount under 3 of the 4 categories of magnetic fields. There is no definitive study or data that can guarantee I will not have future health complications due to this exposure from having these lines forced upon me and my property. Headaches, fatigue, cancer risks, and miscarriages have been indicated in studies of EMF exposure. Much like a coal plant has been found to have very bad consequences for both human health and the environment, these High Voltage lines present a similar danger. In addition, these lines are not welcome on my farm. They will significantly impact my financial well-being and my ability to farm and make a living. The poles themselves are extremely large and impede our ability to farm to an extent that will harm our economic future. My family farm means far too much and I shouldn't be pushed out, nor forced to have these giant monstrosities taking up our valuable farm land that we have worked our entire life to acquire. The family farm is something that should be protected in the State of Minnesota, not giant companies like Excel. Please require Excel to find another solution for their energy "want", as their want should not outweigh the importance of my health, my family's health and our family farm investment for the future.

Submit Date: 07/22/2024 11:32 PM

From: eera.admin_no_reply@state.mn.us
To: Davis, Richard (COMM)
Subject: Public Comment re: Mankato to Mississippi River Transmission Project
Date: Monday, July 15, 2024 10:23:29 AM

Mankato to Mississippi River Transmission Project

Submitter Name: Lori Schulz

Submitter Email:

Submitter Telephone:

Comment:
I am writing this comment to communicate my opposition to the high voltage lines. Docket Number 22-532/23-157. My opposition is based on the significant health and economic impact which is an unacceptable to impose on the residents in the proposed routes. I am a resident in the path of one of these routes. My family farm is within route 2 NORTH and is also the residence of my elderly mother who worked her entire life to pay for and run the farm. She should be able to live her life on the farm where she raised her family and has lived on for 60 years without the health and economic stress that this project will force upon her. The proposed high-voltage transmission lines will produce large values of electric and magnetic fields which will introduce an unacceptable risk to the health of humans, animals, and crops. The effects of the exposure to Electric and Magnetic fields produced by this line is a risk that the State of Minnesota should not impose on the residents. There are no studies that can exclude the health risk. Much like the case highlighted in the movie Erin Brockovich where residents were told there was nothing to worry about but yet there was a health risk present, the installation of high voltage lines and the exposure to EMF may include short and long term effects that may not be known by "experts" at this time. Magnetic fields can penetrate stone, steel, and human bodies! There is already research that shows short term health problems associated with this exposure including headaches, fatigue, anxiety, insomnia, prickling or burning skin, rashes, and muscle pain. There is research about long term risks suggesting that exposure may damage human DNA, and contribute to the development of cancer, leukemia (British Medical Journal, June 2005), risk of Neuro degenerative disease, risk of miscarriage. These health risks are too great and should not be imposed upon us. Excel cannot guarantee that there are no health risks, and therefore should not be able to put these lines in. They need to find another way. The residents on these routes spend a tremendous amount of time outside, exposure is continuous for them. Directly across the street from our family farm is a huge greenhouse business with employees that will be in close proximity to the proposed lines. The economic impact of the placement of these lines on our farm include the placement of HUGE poles with a base that is very large, according to the EXCEL representative they are about 10 feet in diameter. The placement of these poles will significantly impact our ability to farm the property and therefore severely reduce our ability to make a living. The value of the farm will be reduced, the farm property will be imposed upon by the monstrosity of huge electric poles, and the health of humans, animals, and crops is at risk. The family farm is something that should be protected and preserved in the State of Minnesota! I am pleading with the State of Minnesota to require EXCEL Energy to find another solution. Excel ?wants? this line, but the

presumption of ?need? should be challenged on behalf of the residents whose lives and livelihood are put at risk. The negative impact of this line is too great.

Submit Date: 07/15/2024 03:23 PM

Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 280
Saint Paul, MN 55101-2198

Affix Necessary Postage

RICHARD DAVIS
DEPARTMENT OF COMMERCE
85 7TH PLACE EAST STE 280
SAINT PAUL MN 55101-2198

Comment Period Closes Thursday, August 1, 2024, at 4:30 p.m.

Comments must be post-marked or received electronically by the comment deadline.

How to comment:

- Mail comments to the address on this form
- Use the online comment form: https://apps.commerce.state.mn.us/web/project/15507
- Email comments to the Environmental Review Manager: richard.davis@state.mn.us

Comments do not need to be on this form. We encourage you to provide comments in whatever way is most convenient for you. Please include: "Docket Number 22-532/23-157" in all communications. If commenting by email please include "22-532/23-157 Scoping Comment" in the subject line.

THANK YOU for participating in the permitting process! By commenting you are helping inform the Public Utilities Commission's decision regarding this project.

Environmental Impact Statement Scoping Comment Period
Mankato to Mississippi River Transmission Project
Docket Nos. CN-22-532/TL-23-157

Xcel Energy is proposing to construct and operate approximately 130 miles of new 345 kV transmission line from the existing Wilmarth Substation in Mankato to a point near the existing West Faribault Substation (Segment 1 – approximately 48 to 54 miles long), from a point near the existing West Faribault Substation to the existing North Rochester Substation near Pine Island (Segment 2 – approximately 34 to 42 miles long), and from the existing North Rochester Substation near Pine Island to the Mississippi River near Kellogg, Minnesota (Segment 3 – approximately 43 miles long). Segment 3 will be the construction of a 345 kv transmission line in place of an existing 161 kv transmission line, this will create a double circuited 345 kv line. Segment 3 consists of one proposed route, as this segment was permitted by the Commission as part of the CapX2020 Hampton – La Crosse Project. The Project also proposes an approximately 20 miles of new 161 kV transmission line from the existing North Rochester Substation southeast to a connection point with the existing 161 kV Chester transmission line (Segment 4).

For additional project information visit: https://apps.commerce.state.mn.us/web/project/15507 or contact the Environmental Review Manager at: richard.davis@state.mn.us; 651-539-1846; or toll free 1-800-657-3794.

COMMERCE DEPARTMENT

Mankato to Mississippi River Transmission Project

Scoping Comment Form

Please provide your contact information. This information and your comments will be publicly available.

Name: Pat Schwantz Phone: 1-507-330-0660

Street Address: 13105 St. Hwy 60

City: Waterville State: MN ZIP: 56096

Email: schwantz_pat@msn.com.

Share your comments on the Mankato to Mississippi River Transmission Project. Please be as specific as possible.

- Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility?
- What potential human and environmental impacts of the proposed project should be considered in the EIS?
- Are there any methods to minimize, mitigate, or avoid potential impacts of the proposed project that should be considered in the EIS?
- Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project?
- Are there any unique characteristics of the proposed project area that should be considered in the EIS?

8-1-24

Dear Mr. Davis:

My name is Pat Schwantz and I am concerned about the southern route for the 345-KV transmission lines. X-Cel tried to run a power line through my property about 20+ years ago which would have went through DNR protected streams and rivers (Haus Marsh), Whitewater creek, etc. The DNR dept. assisted us in stopping this and X-Cel then stayed along Highway 60 and did not disrupt the waterways and natural resources plus all the wildlife that goes through this area. (The power lines would have run North and South) - Now this current Southern route would Run East and West through the same protected streams and Rivers and disrupt the wildlife! What gives?? Our natural resources and wildlife are precious to all of us and deserve to be protected and preserved for everyone and the future generations. Please be responsible and do the right thing and use the northern route. Respectfully submitted - Pat Schwantz

If including additional pages, please number them and tell us how many you are providing: _____ pages

P. Schwartz
13105 St. Hwy 60
Waterville, MN. 56096

SAINT PAUL MN 550
1 AUG 2024 PM 2 L

Richard Davis
Dept. of Commerce
85 7th Place East Ste 280
Saint Paul, MN. 55101-2198

55101-214355

From: Davis, Richard (COMM)
To: T Scrabeck
Subject: RE: Mankato to Mississippi River Transmission Project
Date: Friday, July 26, 2024 10:11:00 AM
Attachments: image001.png

Thank you for the additional information, Trevor. As I begin to write the EIS Scope and the EIS itself I may be in touch.

Thanks again,
Rich

From: T Scrabeck <tscrabeck@live.com>
Sent: Thursday, July 25, 2024 8:09 PM
To: Davis, Richard (COMM) <richard.davis@state.mn.us>
Subject: Re: Mankato to Mississippi River Transmission Project

---

Richard,

I did discuss it with Ellen Heine and others. Their suggestion was to make the new poles no higher than the existing structures. I explained to them as I laid out in my comments that it would not mitigate the impacts. It would help if the new line was constructed no higher and on the west side of the existing structures (if this route was indeed chosen) but they were not open to that suggestion. I suggested other alternatives (as described in Xcel's application) but they were also shot down. Let me know if I can provide any further information.

Thanks,
Trevor Scrabeck
507-356-2117

From: Davis, Richard (COMM) <richard.davis@state.mn.us>
Sent: Thursday, July 25, 2024 3:05 PM
To: tscrabeck@live.com <tscrabeck@live.com>
Subject: Mankato to Mississippi River Transmission Project

Hello Trevor,

I wanted to confirm that I received your comments on the MMRT Project.

I looked at Xcel's Permit Application, and it looks like they identify/acknowledge your private airstrip, but they don't provide any discussion on avoiding or minimizing impacts to your airstrip operations. Has Xcel had any discussions with you regarding potential impacts of their proposed project? If so, could you please provide me some details on conversations you have had?

Thank you,
Rich Davis

Richard Davis
Environmental Review Manager
Energy Environmental Review and Analysis
Office: 651-539-1846
Cell : 507-380-6859
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

From:	eera.admin_no_reply@state.mn.us
To:	Davis, Richard (COMM)
Subject:	Public Comment re: Mankato to Mississippi River Transmission Project
Date:	Thursday, July 25, 2024 1:24:21 PM
Attachments:	EIS public comment.pdf

Mankato to Mississippi River Transmission Project

Submitter Name: Trevor Scrabeck

Submitter Email: tscrabeck@live.com

Submitter Telephone: (507) 356-2117

Comment:
Comments attached

Submit Date: 07/25/2024 06:23 PM

July 25, 2024

In the matter of transmission line route permit Docket 23-157.

I am the owner of a personal use airport in section 30 of New Haven township at 9455 110th Ave NW, Pine Island, MN 55963 established in 2014.

I am concerned with route option 4 west in segment 4 of the project. My runway runs NE-SW. An existing 345Kv line runs N-S and parallel to CR5 and is 2000 ft off the end of my runway. The existing 345Kv line is low enough and far enough away that I am able to fly a safe pattern. Any additional lines that are placed closer and/or taller than the existing lines will limit my ability to operate or shut me down entirely. My approach for landings to the east are made from the south. Even if the new lines were kept as low as the existing lines, I will have less room to make my turn for final approach to the east and less room to turn for departure to the north.

I ask for your consideration when looking at the other alternatives in segment 4 of the project.

Sincerely,

Trevor Scrabeck
9455 110th Ave NW
Pine Island, MN 55963

From: Jeff Sigrist
To: Davis, Richard (COMM)
Subject: Comments Mankato-Mississippi River Transmission Project
Date: Tuesday, July 30, 2024 2:58:33 PM
Attachments: MMRT Comments 07-30-2024.pdf

Please find our comments regarding the above attached to this e-mail. Feel free to contact us as provided in the pdf. Let me know if I should pass these along to anyone else.

Regards,
Jeff & Diane Sigrist

Mr. Richard Davis
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

July 30, 2024

Dear Mr. Davis,

Please find our comments for the Mankato – Mississippi River Transmission Project attached. These comments pertain to the proposed east corridor of Segment 4, west side of Highway 52 along Wazuweeta Road (frontage road) and near the intersection of 120th Street NW and Wazuweeta Road south of Pine Island. Comments 1 & 2 are also general in that they are applicable to other locations as well.

Feel free to contact us at this e-mail address or at (507) 356-8554.

Best regards,

Jeff & Diane Sigrist
6300 120th Street NW
Pine Island, MN 55963

These comments are in followup to the Public Information and EIS Scoping Meeting held in Pine Island, MN on July 9, 2024.

Our home is located within the eastern proposed corridor of the 161 kV line that runs along and on both sides of Highway 52. We live near the intersection of 120th Street NW and Wazuweeta Road which is the frontage road on the west side of Highway 52 about six miles south of Pine Island (image below).

Comment 1: Share Existing Easement Space for 161 kV Line Location and Easement Purposes

At the meeting referenced above, we were told that this line would require 80-100 feet of easement (40-50 feet on each side) and that this easement would not infringe upon other easements. Exact words were something like, "We would not infringe on any other easements in that area." Specifically discussed was the easement along the frontage road (Wazuweeta Rd.) and as explained to us, the line would need to be placed outside of this area; if the frontage road requires a 40 foot easement (on each side), the line would need to be placed at least 80 feet from the frontage road (40 feet for the road plus 40 feet for the line). Time did not allow us to discuss the other existing easements at that location for adjoining 120th Street NW, including the "dead-end" section of the street that extends out toward the east (noted below) and the adjacent utility line that continues from that section over to and along Wazuweeta Rd. toward Oronoco. Based on the conversation, one could conclude that these easements would need to be factored in as well, ultimately placing the line farther south of 120th St. NW and well within our property.

We understand the need for an easement to construct, operate, and maintain the line which essentially boils down to a matter of cleared, accessible space. We urge the proponents to make every effort to share existing easements with other parties who are already clearing large swaths of land for access to infrastructure which would:

- Reduce operational costs of maintaining that space for all participating parties
- Provide access nearer to the road that would make maintenance easier and improve reliability
- Greatly reduce the impact on landowners and surrounding communities, and
- Minimize the impact on wildlife including that surrounding the Zumbro River valley

We noted coming home from the meeting that there appears to be a similar line running along 125th Street NW southeast of Pine Island and west of the elementary school. Some of these towers appear to be reasonably close to the roadway and therefore have a relatively minimal incremental impact on the surrounding area. We believe that every effort should be made to likewise keep the line as close to Wazuweeta Road as possible (as shown by the blue line, below) and to do similarly wherever else existing easements might be shared to limit disruption to property owners, wildlife, and ultimately the greater surrounding communities.

Proponents should be challenged to share existing easement space. In locations where proponents deviate from sharing such space, they should be required to document why this deviation is necessary.

Comment 2: Impact to Area Wildlife and Zumbro River Valley

Placement of the line to the south of 120th Street NW (and further from Wazuweeta Rd.) would likely require removal of wooded areas from our property (and our neighbor's) that would impact vegetation

and wildlife in the area which in turn affects not just our own quality of life, but ultimately everyone else's as well. We try to be good stewards by planting trees, bushes, flowers, etc. to attract wildlife and by feeding various birds year around.

As the area is further developed, the impact to wildlife should not be ignored. Our small acreage and the surrounding river valley is home to:

- pileated woodpeckers
- red-headed woodpeckers
- turkeys
- owls
- red-tailed hawks
- sparrow hawks
- other hawks, large and small
- indigo buntings
- orioles (baltimore and boston)
- cedar waxwings
- bluebirds
- bald eagles
- cranes
- fox
- coyotes
- more

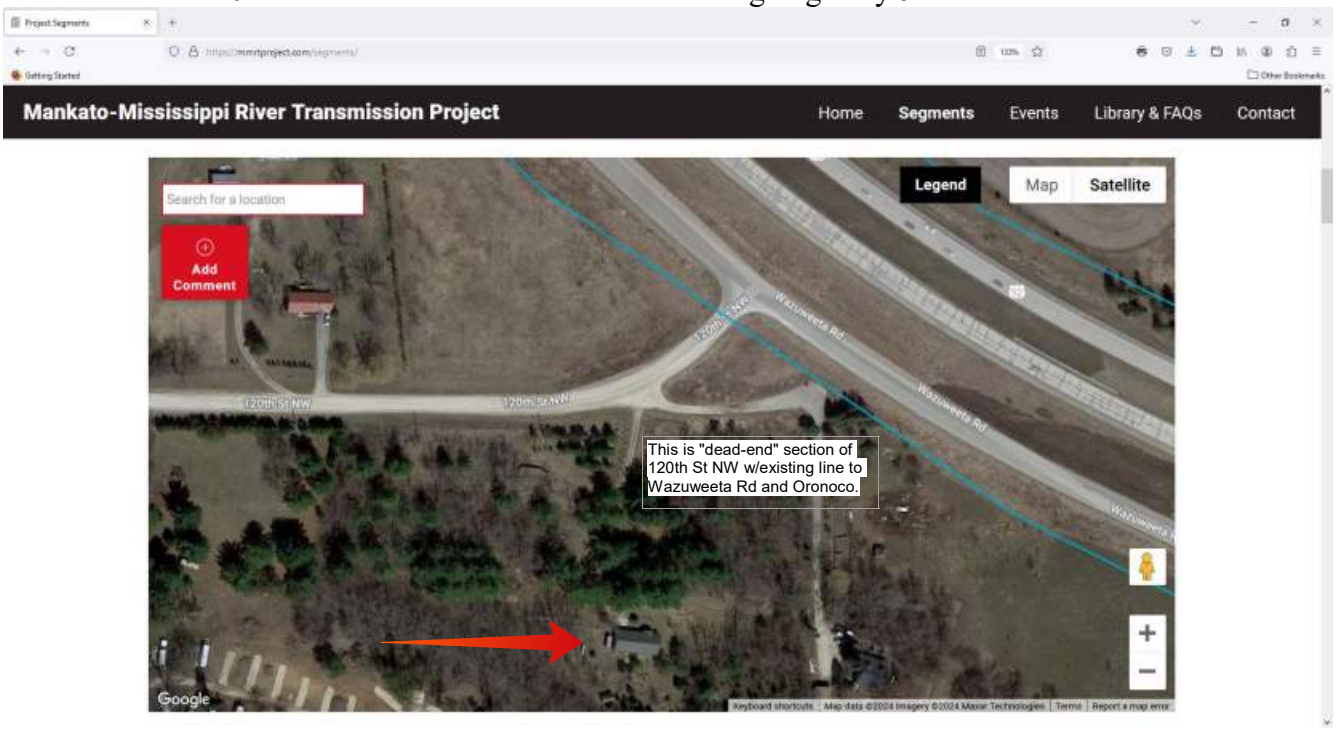
We have been feeding birds nonstop since moving here 22 years ago, and feeding the smaller birds invites the larger birds of prey such as hawks. The nearby Zumbro River valley just below and south of us provides habitat for cranes, geese, and bald eagles.

We should strive to preserve this already strained habitat and the Zumbro River valley ecological system by maximizing use of space that has all ready been disrupted by development. To reduce the ecological footprint, proponents should be challenged to share already existing easement space with others. In locations where proponents deviate from sharing such space, they should be required to document why this deviation is necessary.

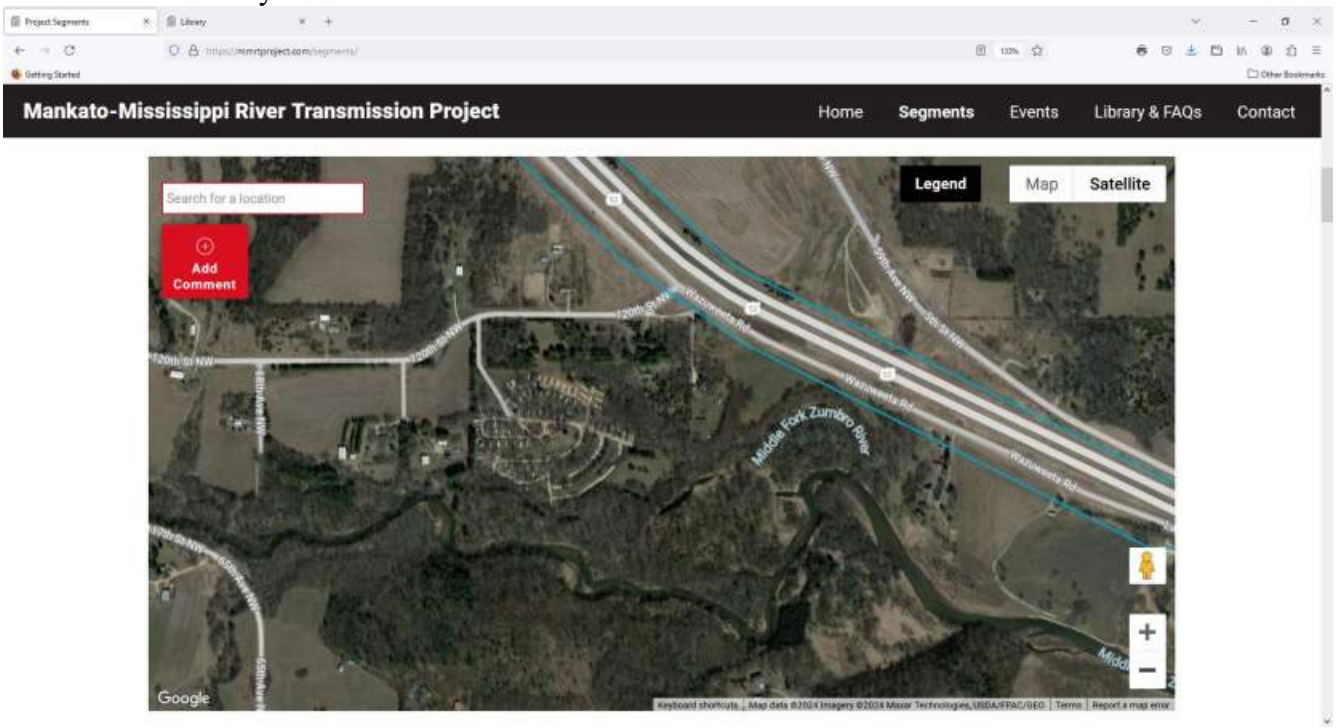
Comment 3: Geological Feature

This comment is just to call attention to a geological feature. In the spring, melt-water can flow south via an existing culvert under the "dead-end" section of 120th Street NW and out into the northeast corner of our property from where it disappears underground and presumably out to the Zumbro River to our south. (Water can be observed coming out of the bank into the river.) The point where the water disappears is near our neighbor's driveway, about halfway down.

Intersection of 120th Street NW and Wazuweeta Road along Highway 52 south of Pine Island.



Zumbro River Valley south of 120th Street NW and Wazuweeta Road



From:	Jennifer Heibel
To:	Davis, Richard (COMM)
Cc:	Brady Taylor
Subject:	Mankato to Mississippi River Transmission Project
Date:	Monday, July 8, 2024 9:33:07 PM

Good evening Rich,

Thanks again for taking the time to meet with us to discuss details regarding the Mankato to Mississippi River Transmission Project.

As we discussed, our multigenerational pre-civil war home located at 8789 State Highway 60 Waterville, MN is within the 150-foot wide “right-of-way” for a preliminary route option of segment 1. Initial aerial views obtained online of our property did not reveal this due to tree cover. We appreciate you taking a closer look at this in the EIS.

All the best,
Jennifer and Brady Taylor

From: eera.admin_no_reply@state.mn.us
To: Davis, Richard (COMM)
Subject: Public Comment re: Mankato to Mississippi River Transmission Project
Date: Wednesday, July 17, 2024 11:39:39 AM
Attachments: Thomforde 23-157 Evironmental Scoping Comments.pdf

Mankato to Mississippi River Transmission Project

Submitter Name: Dale Thomforde

Submitter Email: superthomforde@aol.com

Submitter Telephone: (507) 226-1082

Comment:
I have submitted 2 alternatives for Segment 4 of the MMRT Project. These 2 alternatives were presented during the public comment period at the In-Person Meeting at the American Legion, Faribault, MN, on July 9, 2024. A hardcopy of my comments were submitted at the meeting along with a summary presentation. To ensure my full written comments are considered submitted before the August 1 deadline, I am submitting the same comments here in pdf format. Best regards, Dale Thomforde 9637 Plum Creek Rd NW Pine Island, MN 55963

Submit Date: 07/17/2024 04:38 PM

In the matter of transmission line route permit Docket 23-157.

Topics for Comment at this time for Environmental Scoping include:

- Are there any methods to minimize, mitigate, or avoid potential impacts of the proposed project that should be considered in the EIS?
- Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project?

I previously submitted concerns about the completeness of the application for the MMRT Project, specifically the Segment 4 proposed routes. In my opinion there are at least 2 additional alternatives that need fair consideration. Other than my submitted concerns appearing on the docket, I have received no communication or response to the concerns that were raised.

I am a Supervisor on the New Haven Township Town Board. As one of the three Supervisors for the Township, I do not speak for New Haven Township. However, I do speak for a number of Township residents that have expressed concerns about the proposed transmission line routes in Segment 4.

Alternative 1

I have been consulting with other townships and the City of Oronoco regarding the routing of Segment 4. Pine Island Township, Oronoco Township, Cascade Township, and the City of Oronoco adopted resolutions requesting that the Route Permit application for the Segment 4 proposed transmission line with the Minnesota Public Utilities Commission, include at least one alternative for the new single-circuit 161 kV line that essentially follows the existing CapX2020 transmission line route from the North Rochester Substation to the Chester Junction.

Based on the following excerpt, this alternative was evaluated and rejected.

See document Appendix Q page 11:

R13/R13a: Hampton to La Crosse Parallel Alternative

During early stages of the routing process, the Applicant evaluated an approximately 14.8-mile alternative that would have involved construction of the 161 kV line parallel and adjacent to the CapX Hampton to La Crosse 345 kV line, which is also Segment 3 of this Project. This would have involved construction the 161 parallel to and offset from the existing 345/345 kV double-circuit line. The primary concern with this alignment was that there was inadequate room to construct this line at the Zumbro River crossing where the existing line crosses from the top of bluffs on the east and west banks. This alternative also included the greatest amount of new transmission right-of-way on lands already occupied by transmission line right-of-way, and included some locations where the parallel line would have been within 150 feet of existing homes. Because of these reasons, the alternative was not included as part of the Proposed Routes. In January and February 2024, the Applicant received resolutions from three townships and one city in Olmsted County (see Appendix M) requesting that this alternative be included in the application. Figure Q-6 shows this parallel alternative, which includes a possible alternative Zumbro River crossing location, which would be necessary due to the terrain where the existing Hampton to La Crosse crosses the river.

Using the parallel and offset CapX line route has many advantages, including the advantage that it requires the least mileage of new line construction and the least impact to local residents. This route would require about 16 miles of construction of new 161 KV transmission line, while combinations of the Segment 4 East and Segment 4 West routes would require construction about 19.5 to 23.6 miles of transmission line.

The following statement is made in the cited excerpt of Appendix Q: "*This alternative also included the greatest amount of new transmission right-of-way on lands already occupied by transmission line right-of-way, and included some locations where the parallel line would have been within 150 feet of existing homes. Because of these reasons, the alternative was not included as part of the Proposed Routes.*"

This appears to conflict with a statement made in the *Notice of Filing of Route Permit Application With the Minnesota Public Utilities Commission For the Mankato To Mississippi River Transmission Project - Docket No. E002/Tl-23-157,* where it states: "*Many portions of the proposed route are located along existing transmission line rights-of-way, minimizing the potential impact of the Project.*" The proposed CapX route for the 161 kV line is essentially all along and offset from the existing transmission line rights-of-way (ROW). It is agreed that the new line would require new rights-of-way mostly adjacent to the existing transmission line rights-of-way

As for the statement "*the parallel line would have been within 150 feet of existing homes*", I find the statement disingenuous when compared to the other proposed routes. With careful placement of the parallel line, there is only <u>one</u> residence that would be closer than 150 feet (11968 Hwy 63 NE). This could easily be alleviated by diverting the new line to the south around the residence. It should be noted that the Segment 4 West route has seven instances where the proposed new line would be within 150 feet of existing homes. The Segment 4 East route is even worse since it has 19 instances where the proposed new line would be within 150 feet of existing homes. To make things even worse, many residences along 75th Street/Highway 63 would lose at least 50 of trees and bushes between their home and the highway. These trees and bushes are currently used to help shield the residence visually from highway and to shield the residence from noise. These would be cleared from the proposed transmission line ROW.

The existing 345/345 kV line does have a small portion that crosses Prairie Island Indian Community (PIIC) property near Ash Rd NW. A parallel 161 kV line can avoid crossing the PIIC property by shifting the route ½ mile to the east for a short span.

That leaves the Lake Zumbro River crossing the only unresolved problem. It does appear that there are openings on the bluffs on both sides just to the north of the existing 345/345 kV crossing. The 345/345 kV crossing was handled, so it doesn't appear adding a 161 kV crossing should be that difficult.

For these reasons, I believe further investigation of a parallel and offset 161 kV line should be considered.

Alternative 2

Another alternative might be adding a substation at the Chester Junction. This alternative could eliminate the need for any new construction of 161 kV line in segment 4. Adding a substation could connect the existing 161 kV line to the 345/345 kV lines.

This alternative should be evaluated since it could save a lot of construction cost and materials of 16 to 25 miles of 161 kV transmission line. It could also eliminate the clearing of many acres of trees within any new ROW.

Sincerely,

Dale Thomforde
9637 Plum Creek Rd NW
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Tele 507-225-1082

Add substation at Chester Junction near 1200 40th St NE (Olmsted County, Farmington Township, Section 9)

Only flag residences that would be closer to the new transmission line than the existing transmission line

Contact: Dale Thomforde
9637 Plum Creek Rd NW, Pine Island, MN 55963
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	Alternative CapX2020 Parallel Route			Parcel ID		
1	PRAIRIE ISLAND INDIAN COMMUNITY	75 ft		840624039647		May shift to the east of property line by 75+ feet to avoid any PIIC easement
2	11820 14 AVE NW	335 ft	ROBINSON, PENNY E	841041039708		Adjusting for 125 feet of ROW, leaves 210 feet from residence
2	11717 11 AVE NE	375 ft	SCHWANKE, BRIAN D	841231060658		Adjusting for 125 feet of ROW, leaves 250 feet from residence
3	1485 WHITE BRIDGE RD NE	420 ft	ENGLISH, BRIAN J	841241071908		Adjusting for 125 feet of ROW, leaves 290 feet from residence
4	11968 HWY 63 NE	200 ft	CONRAD, CHRISTOPHER	830832032957	1	Results in less than 150 feet from residence. May shift to the south by 750 feet
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	Segment 4 West Route					
1	9455 110 AVE NW	1800 ft	SCRABECK, TREVOR S	853011050533		1800 feet from the end of personal landing strip. Normal 3% glide slope would be 54 feet
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9	1200 81 ST NE	127 ft	ARMBRUSTER JR, C EDWARD	843613040137	1	
			Total Segment 4 West Route 150 ft or less		7	
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1	White Pines Sportsman's Club	128 ft				Commercial
2	CJ Auto Sale	120 ft				Commercial
3	Miller Express Cars	100 ft				Commercial
4	815 Minnesota Ave S	90 ft	Thompson Ventures LLC	841732077793		Commercial
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			Total Segment 4 East Route 150 ft or less		19	

COMMERCE DEPARTMENT

Mankato to Mississippi River Transmission Project
Scoping Comment Form

Please provide your contact information. This information and your comments will be publicly available.

Name: Dale Thomforde Phone: 507-226-1082

Street Address: 9637 Plum Creek Rd NW

City: Pine Island State: MN ZIP: 55963

Email: 54penthomforde@aol.com

Share your comments on the Mankato to Mississippi River Transmission Project. Please be as specific as possible.

- Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility?
- What potential human and environmental impacts of the proposed project should be considered in the EIS?
- Are there any methods to minimize, mitigate, or avoid potential impacts of the proposed project that should be considered in the EIS?
- Are there any alternative routes or route segments that should be considered in the EIS to address or mitigate potential impacts associated with the proposed project?
- Are there any unique characteristics of the proposed project area that should be considered in the EIS?

Thank you for proiding these meetings for comment. Well done.

Further comment were submitted in written form.

If including additional pages, please number them and tell us how many you are providing: _____ pages

In the matter of transmission line route permit Docket 23-157.

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