

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application of Northern
States Power Co. d/b/a Xcel Energy for a
Certificate of Need and Route Permit for the
Minnesota Energy Connection Project in
Sherburne, Stearns, Kandiyohi, Wright, Meeker,
Chippewa, Yellow Medicine, Renville, Redwood,
and Lyon Counties in Minnesota

SERVICE DATE: May 9, 2024

DOCKET NO. E-002/CN-22-131;
E-002/TL-22-132

The above-entitled matter was considered by the Commission on May 2, 2024, and the following disposition made:

- 1. Adopted the system alternatives recommended by EERA for inclusion in the EIS scope.**
- 2. Adopted the route alternatives recommended by EERA for inclusion in the EIS scope.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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April 17, 2024

VIA eDOCKETS

Will Seuffert
Executive Secretary
Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

RE: Minnesota Energy Connection Project
Scoping Summary and Recommendation
Docket No. CN-22-131; TL-22-132

Executive Secretary Seuffert:

Attached are comments and recommendations of Energy Environmental Review and Analysis (EERA) staff in the following matter:

In the Matter of the Certificate of Need and Route Permit Applications for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota

Applications were filed March 9, 2023, and October 30, 2023, by:

Northern States Power Company (Xcel Energy)
Matt Langan, Principal Agent, Siting and Land Rights
414 Nicollet Mall, 414-6A
Minneapolis
matthew.a.langan@xcelenergy.com
612-330-6954

EERA staff herein provides the Commission with a scoping process summary for the project including system and route alternatives.

I am available to answer any questions the Commission might have.

Sincerely,



Andrew Levi
Energy Environmental Review and Analysis

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

Minnesota Energy Connection Project

Docket No. E-002/CN-22-131 | E-002/TL-22-132

Date: April 17, 2024

Staff: Andrew Levi | andrew.levi@state.mn.us | 651-539-1840

In the Matter of the Certificate of Need and Route Permit Applications for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota

Issues Addressed: These comments and recommendations summarize the environmental impact statement scoping process, discuss the routing alternatives proposed during the scoping process, and identifies those alternatives which Energy Environmental Review and Analysis staff recommends for further analysis in the environmental impact statement.

Attachments: Attachment 1 Alternatives Recommended for Inclusion in the Scope of the EIS; Attachment 2 Alternatives Not Recommended for Inclusion in the Scope of the EIS; Attachment 3 Alternative Maps

Additional information, including scoping comments received, can be found on eDockets by searching “22” for year and “131” or “132” for number: <https://www.edockets.state.mn.us/EFiling/search.jsp> or the EERA webpage: <http://mn.gov/commerce/energyfacilities>.

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Introduction

Xcel Energy proposes to construct and operate a 345 kilovolt (kV) double-circuit transmission line between a new substation in Lyon County near Garvin, Minnesota (Garvin Substation), and the existing Sherburne County Generating Station (Sherco) Substation in Sherburne County in the city of Becker, Minnesota.

Xcel Energy (applicant) filed a certificate of need application for the Minnesota Energy Connection Project (project) on March 9, 2023.¹ On August 10, 2023, the Minnesota Public Utilities Commission (Commission) directed that the certificate of need and eventual route permit be processed jointly.² The applicant filed a

¹ Xcel Energy (March 9, 2023) *Certificate of Need Application*, eDocket Nos. 20233-193783-01 thru -05 (hereinafter “CN Application”).

² Minnesota Public Utilities Commission (August 10, 2023) *Order Authorizing Joint Proceedings*, eDockets No. [20238-198151-01](#).

route permit application on October 30, 2023.³ The Commission accepted the route permit application as complete on January 16, 2024.⁴

The Commission requested that Department of Commerce (Department) Energy Environmental Review and Analysis (EERA) staff submit to the Commission, for review and input, the route alternatives suggested during the environmental impact statement (EIS) scoping process. The comments herein describe the scoping process and route alternatives proposed during the scoping process. They discuss those alternatives EERA staff recommends for inclusion in the scope of the EIS. Following the Commission's review and input, the Department will finalize and issue the scoping decision for the EIS.

Proposed Project

The project consists of two major components: new substations along with upgrades to existing substations and new 345 kilovolt (kV) high voltage transmission lines (HVTLS). The applicant proposed two possible HVTL routes as required by Minnesota Rule 7850.1900. Neither of these routes is designated as "preferred" by the applicant.

Proposed substation work involves:

- A new substation to be located near Garvin in Lyon County referred to as the Garvin Substation.
- An intermediate substation to be located 20 miles north of the proposed Garvin Substation referred to as the Intermediate Substation.
- A voltage-support substation to be located 80 miles south of the Sherco Substation in either Meeker, Kandiyohi, or Renville County referred to as the Support Substation.
- Modifications to the existing Sherco Substation and Sherco Solar West Substation near Becker in Sherburne County.

Proposed HVTL work involves:

- A new 345 kV double-circuit HVTL between the Garvin Substation and the existing Sherco Solar West Substation. The applicant's proposed routes are 171 and 174 miles in length and designated as the Purple Route and Blue Route, respectively.
- A new 3.1-mile single-circuit 345 kV transmission line between the existing Sherco Solar West Substation and the Sherco Substation referred to as the Green Segment. The Green Segment would be co-located with applicant's existing Line 5651, occupying the open position on the existing double-circuit-capable structures.

The applicant has generally requested a route width of 1,000 feet and a final right-of-way (ROW) width of 150 feet. Exceptions to the 1,000-foot route width include areas near certain conservation easements and

³ Xcel Energy (October 30, 2023) *Application to the Minnesota Public Utilities Commission for a Route Permit for the Minnesota Energy Connection Project*, eDocket Nos. 202310-199981-01 thru -10; 202310-199982-01 thru -10; 202310-199989-01 thru -10; 202310-199993-01 thru -04; 202310-199995-01 (hereinafter "Route Application").

⁴ Minnesota Public Utilities Commission (January 24, 2024) *Notice of and Order for Hearing*, eDockets No. [20241-202611-01](#).

proposed substations where route widths ranging from three-tenths to one and one-quarter miles are requested to enable flexibility in routing.

The applicant anticipates that construction will begin in third quarter 2025, and that the new transmission line will be complete, with voltage support substations installed, by third quarter of 2031.

Project Purpose

The project is a result of the applicant's 2020-2034 Upper Midwest Integrated Resource Plan (IRP) (Docket No. E002/RP-19-368). The IRP was approved by the Commission on April 15, 2022.⁵ As part of the IRP, the applicant "will seek a certificate of need from the Commission to build . . . [an HVTL] from the retiring . . . Sherco facilities to connect to the regional grid operated by the Midcontinent Independent System Operator [(MISO)]."⁶ This HVTL must be designed to "permit new energy resources to connect to the transmission grid."⁷

As explained by the applicant in their route permit application, the project "would deliver 1,996 megawatts (MW) of carbon-free energy generation to the Sherco Substation. The project will also enable the interconnection of more than 4,000 MW of carbon-free energy generation overall that will support the recently enacted '100 percent by 2040' law that, generally, sets a standard for public utilities to generate or acquire 100 percent of the energy for retail sales from carbon-free resources."⁸

Regulatory Process and Procedures

The project requires two separate approvals from the Commission—a certificate of need and route permit. The applicant filed its certificate of need application for the project on March 9, 2023. The Commission accepted the certificate of need application as complete and authorized use of informal proceedings for developing the record on May 2, 2024.⁹ The Commission later directed joint proceedings be held on the certificate of need application and the route permit application on August 10, 2023.¹⁰ A route permit application was filed on October 30, 2023.

EERA staff will prepare an EIS that will inform the Commission's decisions on the applicant's certificate of need and route permit applications. The first step in preparing the EIS is scoping. The scoping process has two primary purposes: (1) to gather public input as to the impacts, mitigation measures, and alternatives to study in the EIS, and (2) to focus the EIS on those impacts, mitigation measures, and alternatives that will aid in the Commission's decisions on the certificate of need and route permit applications.

Scoping Process Summary

Commission and EERA staff gathered input on the scope of the EIS through seven public scoping meetings and an associated comment period. Six of the meetings were in-person; one meeting was virtual. The meetings occurred on:

⁵ Minnesota Public Utilities Commission (April 15, 2022) *Order Approving Plan with Modifications and Establishing Requirements for Future Filings*, eDockets No. [20224-184828-01](#) (hereinafter "IRP Order").

⁶ Minnesota House Research (December 2022) *Xcel's Approved 2020-2034 Integrated Resources Plan*, retrieved from: <https://www.house.mn.gov/hrd/pubs/xcelreplan.pdf>.

⁷ IRP Order, at 31.

⁸ CN Application.

⁹ Minnesota Public Utilities Commission (May 2, 2023) *CN Acceptance Order*, eDockets No. [20235-195506-01](#).

¹⁰ *Supra*, Note 4.

- January 24 in Granite Falls and Marshall;
- January 25 in Olivia and Redwood Falls;
- January 30 in Litchfield;
- January 31 in Monticello and Kimball; and
- February 1 (virtual).

Approximately 865 people attended the public meetings. As some individuals commented more than once, 88 people provided 108 verbal comments during the in-person and virtual meetings.¹¹

A 44-day comment period, which closed on February 21, 2024, provided an opportunity to submit written comments to EERA staff on potential impacts and mitigation measures for consideration in the scope of the EIS. During the comment period, citizens provided approximately 443 written comments. Additionally, two agencies and 11 local units of government provided comments.¹²

Commenters expressed concern about a variety of potential impacts associated with the project, including those associated with farming operations, property values, multiple transmission lines on a property, aesthetics, land use, wildlife and associated habitat, and noise. Several comments questioned the need for and cost of the project, as well as the reliability of wind and solar energy sources. Approximately one-quarter of the comments expressed a preference for, or displeasure with, a routing option proposed in the route permit application. Commentors proposed multiple route and alignment alternatives and several system alternatives, that is, alternatives to the project itself, for study in the EIS.

In preparing these comments, and consistent with Minn. R. 7850.2500, subp. 3, EERA staff conferred with the applicant on the alternatives proposed for study in the EIS.

EERA Staff Analysis and Comments

This section discusses system alternatives and route alternatives proposed during scoping, and EERA's analysis of these alternatives.

System Alternatives

When considering the need for the project, the Commission is charged with considering reasonable and prudent alternatives including a "no-build alternative, demand side management, purchased power, facilities of a different size or using a different energy source than the source proposed by the applicant, upgrading of existing facilities, generation rather than transmission if a high voltage transmission line is proposed, . . . use of renewable energy sources, and those alternatives identified by the commissioner of the Department of Commerce."¹³ Several citizens submitted comments proposing alternatives to the project itself (discussed below).

¹¹ Minnesota Department of Commerce (March 20, 2024) *Environmental Impact Statement Scoping Comments Received*, eDockets No. 20243-204510-01 thru -10; 20243-204510-01 thru 04 (hereinafter "Scoping Comments").

¹² *Ibid.*

¹³ Minn. R. 7849.1500, Subp. B.

Minnesota Rule 4410.2300(G) states that an alternative may be excluded from detailed analysis in an EIS if “it would not meet the underlying need for or purpose of the project, it would likely not have any significant environmental benefit compared to the project as proposed, or another alternative, of any type, that will be analyzed in the EIS would likely have similar environmental benefits but substantially less adverse economic, employment, or sociological impacts.”

Whether an alternative meets the underlying purpose of a project therefore can be used to determine whether to exclude an alternative from detailed analysis in an EIS. In effect, the purpose statement defines the range of reasonable alternatives to be studied. EERA staff refers to the Commission IRP Order when defining the purpose of the project.¹⁴ EERA staff believes that the purpose of the project is to construct a HVTL to connect new energy sources to the MISO transmission grid at the location of the retiring Sherco coal-fired generator, that is, the Sherco Substation.

The EIS will analyze whether the recommended system alternatives are feasible inasmuch that they meet the purpose of the project. An alternative may be excluded from detailed analysis in the EIS if it would not meet the underlying need for or purpose of the project.

No-build Alternative

Consistent with Minnesota Rule 7849.1500, the EIS will study a no-build alternative.

Continued Coal Generation at Sherco

Commenters suggested maintaining Sherco as a coal-fired generation plant with or without the addition of carbon capture technology. Because the Commission has already approved the applicant’s decision to close Sherco, this alternative will not be carried forward in the EIS.

Modified Generation at Sherco – Solar and Wind

Comments suggested electrical generation at the Sherco property using solar or wind resources. Minnesota Rule 7849.1500 requires the Commission to consider generation rather than transmission. However, because there is not enough physical space to generate the needed levels of electricity on the Sherco property, this alternative will not be carried forward in the EIS.

Modified Generation at Sherco – Nuclear and Natural Gas

Commenters suggested that the coal-fired generation at Sherco could be replaced with either natural gas or nuclear generation. These alternatives must interconnect to the Sherco Substation. Because Minnesota Rule 7849.1500 requires the Commission to consider generation rather than transmission, the EIS will study these alternative forms of generation at Sherco.

Generation Closer to Sherco

Commenters suggested constructing generating plants, whether nuclear, natural gas, solar, or wind powered, closer to the Minneapolis—St. Paul metropolitan area. These alternatives must interconnect to the Sherco Substation. Because Minnesota Rule 7849.1500 requires the Commission to consider generation rather than transmission, the EIS will study these alternative forms of generation.

¹⁴ IRP Order; Staff notes that Minn. R. 7843.0600, Subp. 2, states, in part, “[T]he commission's resource plan decision constitutes prima facie evidence of the facts stated in the decision. This subpart does not prevent an interested person from submitting substantial evidence to rebut the findings and conclusions in another proceeding.”

Distributed Solar Generation

Commenters suggested replacing the project with distributed solar generation on roof tops, parking ramps, commercial/industrial buildings, etc. Because this type of generation would not interconnect to the transmission grid, it will not be carried forward for study in the EIS.

Underground Transmission Line

Commenters suggested constructing an underground transmission line. The EIS will study this alternative.

Route Alternatives

When reviewing route alternatives proposed during the scoping process, the Department is charged with including in the scope of the EIS those alternatives which will “assist in the [Commission’s] decision on the [route] permit application.”¹⁵ EERA staff initially screens proposed route alternatives using five criteria:

1. Was the alternative submitted in a timely manner, prior to the end of the public comment period for scoping?
2. Does the alternative contain an explanation of why the route should be included in the EIS?¹⁶ EERA staff interprets this criterion to require that route alternatives, to be included in the scope of the EIS, must mitigate a potential impact of the proposed project, and this mitigation must be, in general terms, explained by the proposer of the alternative. This suggests that the location of the route alternative must be known in order to determine if potential impacts are mitigated.
3. Is the alternative outside of areas prohibited in Minn. R. 7850.4300, for example, state and national parks?
4. Does the alternative meet the applicants’ stated need for the project?
5. Is the alternative feasible? Can the alternative be constructed and is it permissible by state and federal agencies with authority for construction or operation of the project?

After this initial screening, EERA staff then analyzes the remaining alternatives to determine if their inclusion in the EIS would aid in the Commission’s decision on the route permit application. EERA staff compares each proposed alternative to other alternatives, if any, that could also avoid or mitigate the impact(s) described by the proposer. If a proposed alternative impacts relatively more human and environmental resources, it is likely that it would not aid in the Commission’s decision on the route permit application.

EERA staff has used the above the criteria to analyze alternatives proposed during the scoping process. All proposed alternatives are indicated on the attached maps and discussed here. Commenters recommended 60 route segments, 14 route connectors, and four alternative alignments. Alternatives are summarized in **Attachment 1** Routing Alternatives Recommended for Inclusion in the Scope of the EIS and **Attachment 2** Routing Alternatives Not Recommended for Inclusion in the Scope of the EIS.

The following terminology is used to discuss these alternatives:

¹⁵ Minn. R. 7850.2500.

¹⁶ *Ibid.*

- **Routes** extend most of the length of the project and connect the proposed Garvin Substation and the existing Sherco Solar West Substation. There are two routes, which are the applicant's proposed Blue Route and Purple Route (Map 1). From the Sherco Solar West Substation, the routes terminate at the Sherco Substation in Becker, Sherburne County, Minnesota via the Green Segment (Map 1.2).
- **Route connectors** connect the Blue Route and the Purple Routes (Map 2) and can be used to transition between these routes. Unique, numerical identifications were given to route connectors starting with 101 and ending with 118.
- **Route segments** leave and return to the same route or route connector they originate from. A route segment initiating from the Blue Route returns to the Blue Route; a route segment initiating from the Purple Route returns to the Purple Route. In two cases, route segments initiate from a route connector and return to the same route connector. Unique, numerical identifications were given to route segments starting with 201 and ending with 260.
- **Alternative alignments** are alignments proposed during scoping that deviate from the proposed centerline but fall within the originally proposed route width proposed by the applicant-provided Blue and Purple Routes or route connector. Unique identifications were given to alternative alignments starting with AA1 and ending with AA4.

Alternatives Recommended for Inclusion in the Scope of the EIS

EERA staff recommends that 48 route segments, 11 route connectors, and four alignment alternatives be carried forward for study in the EIS. Staff believes these alternatives would aid in the Commission's decision about the route permit. Conferring with Xcel, all are feasible and could be constructed. These alternatives are listed and briefly described in **Attachment 1**.

Alternatives That Are Not Recommended for Inclusion in the Scope of the EIS

EERA staff recommends that 12 route segments and three route connectors not be included in the scope of the EIS. Alternatives are not recommended for study in the EIS for one of two general reasons: they are not feasible (that is, not constructible) or they would not aid the Commission's decision on a route permit.

Alternatives that are Not Feasible

Alternatives not recommended for inclusion in the EIS because they are not feasible are:

Route Segment 259

Route Segment 260

Route Segment 251

Route Segment 250

Route Segments 259 and 260

Kevin Libbesmeier¹⁷ suggested following State Highway 23 to State Highway 10 (Route Segment 259) and Dan Stein¹⁸ provided a route alternative suggesting following State Highway 23 (Route Segment 260). Route Segment 259 crosses 20 municipalities (Map 3) where 150-foot-wide ROWs are not possible. Route

¹⁷ [Scoping Comments](#), refer to Comment 208.

¹⁸ *Id.*, refer to Comment 214.

Segment 260 (Map 3) is not feasible without Route Segment 259, and it crosses an additional nine municipalities.

Without adequate space for the ROW, these route segments are not feasible. Accordingly, EERA staff recommends that Route Segments 259 and 260 not be carried forward for further study in the EIS.

Route Segment 251

Tim Bonham¹⁹ suggested Route Segment 251 (Map 5) which was described, in part, as going north/south along Highway 71. Given the proximity of residences on both the east and west sides of Highway 71, a 150-foot-wide ROW is not possible, and displacement of the residences would be required. Without adequate space for the ROW and because of the potential for displacement, this route segment is not feasible. Accordingly, EERA staff recommends that Route Segment 251 not be carried forward for further study in the EIS.

Route Segment 250

Mark Hogan²⁰ provided comments summarizing natural and sensitive resources in proximity to Cedar Lane Farm (T112, R34, Sec 9) in Sherman Township and the surrounding area and recommended three alternatives to cross the Minnesota River Valley. Two of the crossing alternatives are located greater than ten miles from the Blue and Purple Routes, increasing project length by at least this distance. No narrative, map or diagram was provided to indicate how these two river crossings would be recommended to rejoin a designated route; therefore, the alternative recommendation does not provide adequate detail. Given the distance from a proposed route and because the two river crossings do not meet the initial screening criteria, these two crossing locations were not mapped by EERA staff.

The commenter's third suggestion (Route Segment 250) for crossing the Minnesota River Valley is located south of Franklin, Minnesota, and adjacent to an existing transmission line (Map 4). Route Segment 250 is constrained by proximity to the city of Franklin and availability of adequate space; therefore, a 150-foot-wide ROW is not possible. Without adequate space for the ROW, this route segment is not feasible. Furthermore, Route Segment 250 crosses six conservation easements (two Conservation Reserve Enhancement Program [CREP] and four Reinvest in Minnesota [RIM] easements) thereby shifting potential impacts to other "natural and sensitive" resources. Accordingly, EERA staff recommends that Route Segment 250 not be carried forward for further study in the EIS.

Alternatives that Would Not Aid in the Commission's Decision

Alternatives not recommended for inclusion in the EIS because EERA staff believes they would not aid in the Commission's decision on a route permit are:

Route Segment 249

Route Connector 116

Route Connector 117

Route Segment 252

Route Segment 253

¹⁹ [Scoping Comments](#), refer to Comment 29.

²⁰ [Scoping Comments](#), refer to Comment 264.

Route Connector 118

Route Segment 254

Route Segment 255

Route Segment 256

Route Segment 257

Route Segment 258

Route Segment 249

To distance the project from her residence, Connie Kieper²¹ provided Route Segments 216 and 249 (Map 6). The commenter's home is across the road and approximately 155 feet from the Blue Route centerline and within the Blue Route's route width.

Route Segment 249 would be located within approximately 270 feet of a residence within its western quarter adjacent to 780th Avenue and within approximately 145 feet of a residence near its middle part adjacent to 780th Avenue. Route Segment 216 would not have any residences within 300 feet. Route Segment 249, therefore, does not mitigate the impact noted by the commenter while Route Segment 216 does. For these reasons, EERA staff believes that 249 would not aid in the Commission's decision on a route permit but recommends Route Segment 216 be studied.

Route Connectors 116 and 117

To minimize impacts to agricultural lands, Gordon and Ramona Neuman²² suggested an alternative following existing roadways including State Highway 4, CSAH 16, Minnesota Highway 22, and Minnesota Highway 55. The Nuemans provided a narrative description of these options but did not provide a map or figure. EERA developed Route Connector 116, which follows CSAH 16 (Map 7), and Route Connector 117, which follows Minnesota Highway 22 (Map 8), based on interpretation of the provided narratives. Similar comments, recommending following Minnesota Highway 22, were also provided by Lisa (Neuman) Newberger,²³ among others.

Route Connector 116 (Map 7) crosses a Waterfowl Production Area (WPA) within its eastern half, south of CSAH 16. The alignment could not be shifted to the north side of CSAH in this location due to proximity to residences and potential for displacement (Map 7). Route Connector 117 crosses a WPA and a lake (Map 8).

EERA staff notes that Route Connectors 105 (Map 2.11), 106 (Map 2.11), and 107 (Map 8) also connect the Purple and Blue Routes in close proximity to Route Connectors 116 and 117. For these reasons, EERA staff believes that because of the potential impacts listed above and availability of different routing options nearby, Route Connectors 116 and 117 would not aid in the Commission's decision on a route permit.

Route Segment 252

To distance the project from residences, Dawn Jansen²⁴ provided recommended Route Segments 252 and 229 (Map 9). Route Segment 252 requires crossing a conservation easement and the Crow River at a new

²¹ [Scoping Comments](#), refer to Comment 84

²² [Scoping Comments](#), refer to Comment 46.

²³ *Id.*, refer to Comment 47.

²⁴ [Scoping Comments](#), refer to Comment 62.

location. By comparison, the Purple Route in this area crosses the Crow River adjacent to an existing bridge crossing and does not cross a conservation easement (Map 9). Route Segment 229 rejoins the Purple Route prior to the Crow River and therefore does not require a new river crossing.

EERA staff notes that Route Segment 252 would likely have more environmental impacts than the Purple Route and Route Segment 229 because of the river crossing location. Additionally, Route Segment 229 mitigates the same residential impacts of Route Segment 252. For these reasons, EERA staff believes that Route Segment 252 would not aid in the Commission’s decision on a route permit but recommends Route Segment 229 be studied.

Route Segment 253

To mitigate potential impacts to agricultural operations caused by the Purple Route, LuVern Becker Jr.²⁵ recommended Route Segments 230 and 253 (Map 10). Route Segment 230 follows parcel boundaries, while Route Segment 253 is adjacent to Minnesota Highway 22 and is in closer proximity to residences. Route Segment 253 would likely result in displacement given land constraints between the road ROW and residences. As such, EERA staff notes that Route Segment 253 would likely have more impacts than Route Segment 230. Additionally, 230 mitigates the same agricultural impacts as Route Segment 253. For these reasons, EERA staff believes that Route Segment 253 would not aid in the Commission’s decision on a route permit but recommends Route Segment 230 be studied.

Route Connector 118

Route Connector 118 (Map 11) was recommended by Gary Woods²⁶ as a means of connecting the Blue Route to the Purple Route. However, there are other alternatives that provide options for connecting the Blue and Purple Route in the same proximity and when compared to Route Connector 118, do not have the same density of forested land cover and waterbodies. **Table 1** summarizes the total land cover within the 150-foot-wide ROW for Route Connector 118 compared to Route Connector 108 (Map 11).

Table 1 Route Connector 108 and 118 Comparison

Land Cover ²⁷	Route Connector 108 ROW (acres)	Route Connector 118 ROW (acres)
Deciduous Forest	0.0	1.1
Emergent Herbaceous Wetlands	0.8	1.3
Open Water	0.6	0.0
Woody Wetlands	0.0	1.0

Given that Route Connector 118 would impact more acres of deciduous forest and waterbody resources, and because there is an alternative nearby (approximately one half mile east) that also connects the Blue Route and the Purple Route but is expected to result in lesser impacts, EERA staff believes that Route Connector 118 would not aid in the Commission’s decision on a route permit.

²⁵ [Scoping Comments](#), refer to Comment 132.

²⁶ [Scoping Comments](#), refer to Comment 294.

²⁷ United States Geological Survey (2021) *National Land Cover Database*, retrieved from: <https://www.usgs.gov/centers/eros/science/national-land-cover-database>

Route Segments 254, 255, 256, and 257

To mitigate potential impacts to planted trees on his property, Jason Pierskalla provided two comment letters^{28, 29} suggesting Route Segments 236-240 and Route Segments 254-257 shown on Map 12.

All route segments mitigate tree clearing along the Blue Route in this location by instead crossing agricultural lands. Of the recommended route segments, Route Segments 236, 237, 238, 239, and 240 avoid center pivot irrigation systems; however, Route Segments 254, 255, 256, and 257 do not. Staff believes the route segments that conflict with existing center pivot irrigation introduce an unnecessary impact to agricultural operations as potential impacts to trees can be mitigated by the route segments that do not cross center pivot irrigation. As a result, Route Segments 254, 255, 256, and 257 would not aid in the Commission's decision.

Route Segment 258

Miguel Cabrera³⁰ suggested three route segment alternatives to mitigate aesthetics concerns specific to his viewshed of the Mississippi River. Cabrera provided a narrative describing the route segments, but he did not provide a map or diagram. EERA developed Route Segments 245, 246, and 258 (Map 13) based on the provided narrative. All three options avoid impacts to the viewshed.

Route Segment 258, compared to Route Segments 245, 246 and the Blue Route, involves spanning the Mississippi River at a wider (>2,000 feet) location, crossing an island in the Mississippi River, crossing a DNR-managed Aquatic Management Area (AMA), and does not parallel an existing crossing of the Mississippi River. For these reasons, EERA staff believes that Route Segment 258 would not aid in the Commission's decision on a route permit but recommends Route Segments 245 and 246 be studied.

EERA Staff Recommendation

The EIS will evaluate the routes (Blue and Purple), route connectors (four total), and route segment (Green Segment) proposed by the applicant in its route permit application.

EERA staff recommends that the EIS also evaluate the routing alternatives summarized in **Attachment 1**. The EIS will analyze whether these alternatives mitigate potential human or environmental impacts and will assist in the Commission's decision on the route permit application. To the extent an alternative achieves these ends, it will be further studied in the EIS. If an alternative does not achieve these ends, the EIS will provide the reasons why and the alternative will be excluded from detailed analysis.

EERA staff recommends that the alternatives noted in **Attachment 2** not be carried forward for study in the EIS for the reasons discussed above.

To EERA staff's understanding, if the Commission concurs or takes no action, the Department will proceed to finalize and issue an EIS scoping decision. If the Commission takes an action other than concurring and modifies the Department's recommendations, the Department will incorporate the Commission's input and will finalize and issue an EIS scoping decision that reflects this input.

²⁸ [Scoping Comments](#), refer to Comment 162.

²⁹ [Scoping Comments](#), refer to Comment 56.

³⁰ [Scoping Comments](#), refer to Comment 167.

Attachment 1

Alternatives Recommended for Inclusion in the Scope of the EIS

Note: Numbers provided in parentheses after a commenter's name in the "Alternative Description" column coincide with the comment number as indicated by the index in eDockets No. [20243-204510-01](#).

Name	Map	Type	Route Connection	Alternative Description	Source
Blue Route	2.1-2.20	Route	NA	The Blue Route is 174 miles long and was proposed by the applicant. It crosses Sherburne, Stearns, Meeker, Kandiyohi, Renville, Redwood, and Lyon counties.	Applicant
Purple Route	2.1-2.20	Route	NA	The Purple Route is 171 miles long and was proposed by the applicant. It crosses Sherburne, Wright, Stearns, Meeker, Kandiyohi, Chippewa, Renville, Yellow Medicine, and Lyon counties.	Applicant
201	2.1	Route Segment	Blue	EERA received a scoping comment from Ronald McDaniel (#111) proposing Route Segment 201. This route segment initiates at the proposed Garvin Substation in Lyon County. It traverses north along U.S. Highway 59 until Country Road 2 where it turns east until it joins the Blue Route. The commenter noted potential impacts on habitat/wildlife/rare species, water resources, and land use.	Public
202	2.1	Route Segment	Blue	EERA received scoping comments from Stephen Miller (#59) and Ronald McDaniel (#111) proposing Route Segment 202. This route segment departs the Blue Route at County Road 9 and traverses north. It turns east along the northern border of T110N, R40W, S29 until it rejoins the Blue Route. The commenters noted potential impacts on farming operations, habitat/wildlife/rare species, water resources, and land use.	Public
203	2.1	Route Segment	Blue	EERA received a scoping comment from the Lyon County Commissioner (#443) proposing Route Segment 203. This route segment departs the Blue Route at County Road 9 and traverses north. It turns east at 185th Street, traverses north on 310th Avenue, continues east on 190th Street, then traverses north on 320th Avenue until it rejoins the Blue Route. The Commissioner noted potential impacts on farming operation, land use, and tree removal.	Lyon County Commissioner

Name	Map	Type	Route Connection	Alternative Description	Source
204	2.1	Route Segment	Purple	EERA received a scoping comment from Eldan Mitzer (#257) proposing Route Segment 204. This route segment departs the Purple Route by traversing further west on U.S. Highway 14. Halfway into T109N, R41W, S16, it turns north until it rejoins the Purple Route. The commenter noted potential impacts on stray voltage, land use, and green/clean energy.	Public
205	2.2	Route Segment	Purple	EERA received a scoping comment from Ken Marcotte (#32) proposing Route Segment 205. This route segment departs the Purple Route at 190th Street where it traverses east to U.S. Highway 59. From here it turns north until it rejoins the Purple Route. The commenter noted potential impacts on habitat/wildlife/rare species and water resources.	Public
206	2.2	Route Segment	Purple	EERA received a scoping comment from Ken Marcotte (#32) proposing Route Segment 206. This route segment departs the Purple Route at County Road 67 and traverses north to 220th Street. From here, it turns east until it rejoins the Purple Route. The commenter noted potential impacts on habitat/wildlife/rare species and water resources.	Public
101	2.2	Route Connector	Connects Blue and Purple Routes	Route Connector 101 was proposed by the applicant as "Connector D." It is approximately 8 miles long and located in Lyon County.	Applicant
207	2.2	Route Segment	(route segment starting and ending on Connector 101)	EERA received a scoping comment from Mike Truwe (#61) proposing Route Segment 207. This route segment departs the Blue Route and traverses north on the eastern border of T110N, R40W, S17 until it joins Route Connector 101. The commenter noted potential impacts on stray voltage, aesthetic impacts/property values, tree removal, and noise.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
208	2.2	Route Segment	(route segment starting and ending on Connector 101)	EERA received a scoping comment from Leslie Bergquist (#101) proposing Route Segment 208. This route segment departs Route Connector 101 at 230th Street and traverses west. It turns north at 310th Avenue until it rejoins Route Connector 101. The commenter noted potential impacts on farming operation, aesthetic impacts/property values, and use of existing ROW.	Public
209	2.4	Route Segment	Purple	EERA received a scoping comment from David Kietzmann and Saralee Kietzmann (#266) proposing Route Segment 209. This route segment departs the Purple Route at 490th Street and traverses north. It turns east at 290th Avenue until it rejoins the Purple Route. The commenters noted potential impacts on farming operation and water resources.	Public
210	2.4	Route Segment	Purple	EERA received a scoping comment from Leslie Bergquist (#101) proposing Route Segment 210. This route segment departs the Purple Route continuing north on State Highway 23 following the curve of the highway until it rejoins the Purple Route. The commenter noted potential impacts on farming operation, aesthetic impacts/property values, and use of existing ROW.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
102	2.3	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Daniel Wambeke and 43 others (#320) proposing Route Connector 102. This route connector departs the Blue Route at Lyon Redwood Road and traverses north. It turns east at 230th Street, continues north on Aspen Avenue, then continues east on 260th Street. From there, the route connector traverses north at County Highway 8, turns east halfway into T114N, R39W, S33, then continues north at County Road 6. It traverses west across the lower portion of T114N, R39W, S28, turns north halfway into the section, then continues east halfway into T114, R39W, S21. The route connector traverses north at State Highway 274 following the curve of the highway, turns west halfway into T114N, R39W, S4, and continues north a third of the way into the section. It traverses west on 220th Ave, turns north at the western border of T115, R39W, S32, and continues west at 230th Avenue until it joins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, farming operation, stray voltage, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, proximity to home/being boxed in, land use, and noise.	Public
211	2.3	Route Segment	Blue	EERA received a scoping comment from Ben Hicks (#289) proposing Route Segment 211. This route segment departs the Blue Route at County Road 8 and traverses south. It turns east at County Road 4 and continues north at Duncan Avenue until it rejoins the Blue Route. The commenter noted potential impacts on farming operation, habitat/wildlife/rare species, land use, and tree removal.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
212	2.3	Route Segment	Blue	EERA received a scoping comment from Jeff Turbes (#102) proposing Route Segment 212. This route segment departs the Blue Route by continuing east on 240th Street. It turns north at County Highway 7 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation, stray voltage, aesthetic impacts/property values, and use of existing ROW.	Public
213	2.3	Route Segment	Blue	EERA received a scoping comment from Jeff Potter (#22) proposing Route Segment 213. This route segment departs the Blue Route by continuing north on Ideal Avenue. It turns east halfway into T112N, R37W, S14, and continues south at Kenwood Avenue until it rejoins the Blue Route. The commenter noted potential impacts on electronic interference, farming operation, stray voltage, aesthetic impacts/property values, and noise.	Public
214	2.5	Route Segment	Blue	EERA received a scoping comment from Cletus Gewerth (#30) proposing Route Segment 214. This route segment departs the Blue Route at Porter Avenue and traverses north. It turns east at 320th Street until it rejoins the Blue Route. The commenter noted potential impacts on water resources and wildlife.	Public
215	2.5	Route Segment	Blue	EERA received a scoping comment from Andrew Rieke and Linda Rieke (#270) proposing Route Segment 215. This route segment departs the Blue Route at Highway 19 and traverses east. It turns north halfway into T112, R34W, S2 until it rejoins the Blue Route. The commenters noted potential impacts on farming operation.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
216	2.6	Route Segment	Blue	EERA received a scoping comment from Connie Kieper (#84) proposing Route Segment 216. This route segment departs the Blue Route halfway into T115N, R34W, S25 traverses east. It turns north at the eastern border of T115, R33W, S30 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, electronic interference, farming operation, noise, and use of existing ROW.	Public
217	2.6	Route Segment	Blue	EERA received a scoping comment from Larry Posl (#209) proposing Route Segment 217. This route segment departs the Blue Route near the top of the eastern border of T115N, R33W, S6 and traverses northwest. It turns west at County Road 70, continues north at County Road 57, then continues east at the northern border of T116N, R33W, S31 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.	Public
218	2.6	Route Segment	Blue	EERA received a scoping comment from Larry Posl (#209) proposing Route Segment 218. This route segment departs the Blue Route near the top of the eastern border of T115N, R33W, S6 and traverses northwest. It turns west at County Road 70, continues north at County Road 57, then continues east at the northern border of T116N, R33W, S30 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
219	2.3	Route Segment	Blue	EERA received a scoping comment from Ben Hicks (#289) proposing Route Segment 219. This route segment departs the Blue Route at County Road 8 and traverses south. It turns east at County Road 4, and continues north halfway into T110N, R38W, S17 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation, habitat/wildlife/rare species, land use, and tree removal.	Public
220	2.5	Route Segment	Blue	EERA received a scoping comment from Brian Greenslit and Gloria Greenslit (#3) proposing Route Segment 220. This route segment departs the Blue Route at State Highway 19 and traverses east. It turns north halfway into T112, R34W, S3 until it rejoins the Blue Route. The commenters noted potential impacts on aesthetic impacts/property values, proximity to home/being boxed in, and noise.	Public
221	2.4	Route Segment	Purple	EERA received a scoping comment from David Kietzmann and Saralee Kietzmann (#266) proposing Route Segment 221. This route segment departs the Purple Route at 260th Avenue and traverses west. It turns north at 520th Street, continues east at State Highway 67, and continues north a quarter of the way into T116N, R39W, S31. It turns east a quarter of the way into the section until it rejoins the Purple Route. The commenters noted potential impacts on farming operation and water resources.	Public
103	2.7	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Melvin Zuidem (#35) proposing Route Connector 103. This route connector departs the Purple Route continuing east on County Highway 18 until it joins the Blue Route. The commenter noted potential impacts on farming operation and development/community.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
222	2.9	Route Segment	Blue	EERA received a scoping comment from Luke Johnson (#306) proposing Route Segment 222. This route segment departs the Blue Route at 195th Avenue SE and traverses north. It turns east at County Road 77 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation.	Public
223	2.9	Route Segment	Blue	EERA received a scoping comment from Duane Anderson (#200) proposing Route Segment 223. This route segment departs the Blue Route continuing east on 100th Street. It turns north at 515th Avenue until it rejoins the Blue Route. The commenter noted potential impacts on land use.	Public
104	2.7	Route Connector	Connects Blue and Purple Routes	Route Connector 104 was proposed by the applicant as "Connector C." It is approximately 29 miles long and located in Kandiyohi and Chippewa counties.	Applicant
224	2.10	Route Segment	Purple	EERA received a scoping comment from Marilyn Worke and Helga Miller (#256) proposing Route Segment 224. This route segment departs the Purple Route at 30th Avenue SE and traverses east. It turns north halfway into T119N, R33W, S19 until it rejoins the Purple Route. The commenters noted potential impacts on farming operation.	Public
225	2.10	Route Segment	Purple	EERA received a scoping comment from Jordan Junkermeier and Rachel Junkermeier (#130) proposing Route Segment 225. This route segment departs the Purple Route continuing north halfway into T119N, R33W, S6. It turns east at 30th Avenue NE until it rejoins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, proximity to home/being boxed in, tree removal, and green/clean energy.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
105	2.11	Route Connector	Connects Blue and Purple Routes	Route Connector 105 was proposed by the applicant as "Connector B." It is approximately 1 mile long and located in Meeker County.	Applicant
106	2.11	Route Connector	Connects Blue and Purple Routes	Route Connector 106 was proposed by the applicant as "Connector A." It is approximately 1.5 miles long and located in Meeker County.	Applicant
107	2.12	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Maureen Murray (#45) proposing Route Connector 107. This route connector departs the Purple Route continuing east halfway through T121N, R31W, S27 until it connects to the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, electronic interference, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, land use, conservation easement, and bees/pollinator habitat.	Public
226	2.11	Route Segment	Blue	EERA received a scoping comment from Von Grotto (#246) proposing Route Segment 226. This route segment departs the Blue Route at the southwestern corner of T120N, R31W, S9 and traverses northeast. It turns east a quarter of the way through the section, continues north at 600th Avenue, and continues east at the northern border of T120N, R31W, S3 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation and proximity to home/being boxed in.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
227	2.11	Route Segment	Blue	EERA received a scoping comment from Gordon Neuman and Ramona Neuman (#46) proposing Route Segment 227. This route segment departs the Blue Route continuing east on County Road 7. It turns north at State Highway 22 and follows the curve of the highway until it rejoins the Blue Route. The commenters noted potential impacts on farming operation, habitat/wildlife/rare species, and conservation easement.	Public
228	2.11	Route Segment	Purple	EERA received a scoping comment from Gordon Neuman and Ramona Neuman (#46) proposing Route Segment 228. This route segment departs the Purple Route at State Highway 4 and traverses north. It turns east at County Road 16 until it rejoins the Purple Route. The commenters noted potential impacts on farming operation, habitat/wildlife/rare species, and conservation easement.	Public
229	2.12	Route Segment	Purple	EERA received a scoping comment from Dawn Jansen (#62) proposing Route Segment 229. This route segment departs the Purple Route at 590th Avenue and traverses north. It turns east at 349th Street until it rejoins the Purple Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, proximity to home/being boxed in, and tree removal.	Public
230	2.12	Route Segment	Purple	EERA received a scoping comment from LuVern Becker (#132) proposing Route Segment 230. This route segment departs the Purple Route halfway into T121N, R31W, S10 and traverses north. It turns east at County Road 36 until it rejoins the Purple Route. The commenter noted potential impacts on farming operation, aesthetic impacts/property values, and habitat/wildlife/rare species.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
231	2.13	Route Segment	Purple	EERA received a scoping comment from Brad Libbesmeier and Ellen Libbesmeier (#79) proposing Route Segment 231. This route segment departs the Purple Route at 140th Street and traverses east. It turns north at County Highway 149 until it rejoins the Purple Route. The commenters noted potential impacts on public health/EMF/pacemaker, farming operation, aesthetic impacts/property values, use of existing ROW, and green/clean energy.	Public
232	2.13	Route Segment	Purple	EERA received a scoping comment from Ben Stockinger (#143) proposing Route Segment 232. This route segment departs the Purple Route three quarters through T122N, R29W, S32 and traverses east. It continues east at Balsam Road and follows the curve of the road until it rejoins the Purple Route. The commenter noted potential impacts on farming operation and aesthetic impacts/property values.	Public
108	2.14	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from John Stein (#27) proposing Route Connector 108. This route connector departs the Purple Route a quarter through T122N, R29W, S34 and traverse south until it connects to the Blue Route. The commenter noted potential impacts on habitat/wildlife/rare species, water resources, and farming operations.	Public
109	2.14	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 109. This route connector departs the Purple Route at the western border of T122N, R29W, S35 and traverses south. It turns east a quarter of the way through the section, continues north a little over halfway through the section, then continues east two thirds through the section to connect to the Blue Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR

Name	Map	Type	Route Connection	Alternative Description	Source
110	2.14	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from John Adolph and Tamile Adolph (#81) proposing Route Connector 110. This route connector departs the Purple Route at Power Rodge Road and traverses east until it connects to the Blue Route. The commenters noted potential impacts on farming operation.	Public
233	2.14	Route Segment	Blue	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 233. This route segment departs the Blue Route at State Highway 15 traversing north following the curve of the highway. It turns east a quarter of the way into T122N, R29W, S35, continues north halfway into the section, then continues east two thirds of the way through the section until it rejoins the Blue Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR
234	2.15	Route Segment	Blue	EERA received a scoping comment from Joel Lauer (#222) proposing Route Segment 234. This route segment departs the Blue Route at State Highway 15 following the curve of the road. It turns east at County Road 146 until it rejoins the Blue Route. The commenter noted potential impacts on farming operation.	Public
235	2.16	Route Segment	Blue	EERA received a scoping comment from Dan Stein (#214) proposing Route Segment 235. This route segment departs the Blue Route continuing north at the western border of T122N, R29W, S25. It turns east three quarters through the section, then continues north a quarter through the section. From there, it turns east a quarter through T122N, R29W, S24 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, water resources, and use of existing ROW.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
236	2.16	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#56) proposing Route Segment 236. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east at 163rd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public
237	2.16	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#56) proposing Route Segment 237. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east halfway into T122N, R28W, S19 until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public
238	2.16	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#49) proposing Route Segment 238. This route segment departs the Blue Route at 73rd Avenue and traverses north. It turns east at 152nd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, farming operation, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, conservation easement, tree removal, and bees/pollinator habitat.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
239	2.16	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#162) proposing Route Segment 239. This route segment departs the Blue Route a quarter of the way through T122N, R28W, S30 and traverses north. It turns east at 152nd Street until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public
240	2.16	Route Segment	Blue	EERA received a scoping comment from Jason Pierskalla (#162) proposing Route Segment 240. This route segment departs the Blue Route a quarter of the way into T122N, R28W, S30 and traverses north. It turns east three quarters through the section until it rejoins the Blue Route. The commenter noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, general environmental impact, and conservation easement.	Public
241	2.15	Route Segment	Purple	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 241. This route segment departs the Purple Route at 73rd Avenue and traverses south. It turns east at 140th Street and follows the curve of the street. From there, it turns north at 53rd Avenue until it rejoins the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR

Name	Map	Type	Route Connection	Alternative Description	Source
242	2.15	Route Segment	Purple	EERA received a scoping comment from Joe Lauer (#197) proposing Route Segment 242. This route segment departs the Purple Route at County Highway 7 and traverses south. It turns northeast at County Highway 45 until it rejoins the Purple Route. The commenter noted potential impacts on electronic interference, farming operation, habitat/wildlife/rare species, and land use.	Public
243	2.17	Route Segment	Purple	EERA received a scoping comment from Raechell Nelson (#302) proposing Route Segment 243. This route segment departs the Purple Route three quarters of the way through T122N, R28W, S26 and traverses east. It turns north at 13th Avenue until it rejoins the Purple Route. The commenter noted potential impacts on proximity to home/being boxed in.	Public
111	2.15	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from Jack Miller (#178) proposing Route Connector 111. This route connector departs the Blue Route continuing east at the southern border of T122N, R28W, S30. It turns south at County Highway 7 until it connects to the Purple Route. The commenter noted potential impacts on public health/EMF/pacemaker, farming operations, stray voltage, noise, and use of existing ROW.	Public
112	2.15	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 112. This route connector departs the Blue Route at Dellwood Road and traverses east following the curve of the road. It turns south at County Road 7, continues east at 170th Street, and continues south at 33rd Avenue. From there, it turns east at 165th Street, then continues south at 23rd Avenue until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR

Name	Map	Type	Route Connection	Alternative Description	Source
113	2.15	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 113. This route connector departs the Blue Route at Dellwood Road and traverses east following the curve of the road. It turns south at County Road 7, continues east at 170th Street, and continues south at 33rd Avenue. From there, it turns east three quarters through T122N, R28W, S23. It turns southeast three quarters of the way through the section until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR
114	2.15	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 114. This route connector departs the Blue Route a quarter of the way through T122N, R28W, S20 and traverses east. It turns northeast a quarter of the way through the section, continues north a third of the way through the section, turns east three quarters of the way through the section, and continues northeast two thirds of the way through the section. From there, the route connector traverses north just above the southern border of T122N, R28W, S16, turns east at Dellwood Road following the curve of the road, and continues south at County Road 7. It turns east at 170th Street, continues south at 33rd Avenue, continues east at 165th Street, then turns south at 23rd Avenue until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR

Name	Map	Type	Route Connection	Alternative Description	Source
115	2.15	Route Connector	Connects Blue and Purple Routes	EERA received a scoping comment from the MN DNR (#285) proposing Route Connector 115. This route connector departs the Blue Route a quarter of the way through T122N, R28W, S20 and traverses east. It turns northeast a quarter of the way through the section, continues north a third of the way through the section, turns east three quarters of the way through the section, and continues northeast two thirds of the way through the section. From there, the route connector traverses north just above the southern border of T122N, R28W, S16, turns east at Dellwood Road following the curve of the road, and continues south at County Road 7. It turns east at 170th Street, continues south at 33rd Avenue, and continues east three quarters through T122N, R28W, S23. It turns southeast three quarters of the way through the section until it connects to the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR
244	2.18	Route Segment	Blue	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 244. This route segment departs the Blue Route at the southern border of T123N, R28W, S32 and traverses east. It turns north at almost halfway through T123N, R28W, S33, continues northeast three quarters through the section, continues north at two thirds through the section, and turns northeast at County Road 142 until it rejoins the Blue Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR

Name	Map	Type	Route Connection	Alternative Description	Source
245	2.19	Route Segment	Blue	EERA received a scoping comment from Miguel Cabrera and Shannon Cabrera (#167) proposing Route Segment 245. This route segment departs the Blue Route at Franklin Road and traverses north. It turns east at the southern border of T34N, R30W, S5, continues northeast at the southwest corner of T34N, R30W, S4, and continues southeast at County Road 8 SE until it rejoins the Blue Route. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, and water resources.	Public
246	2.19	Route Segment	Blue	EERA received a scoping comment from Miguel Cabrera and Shannon Cabrera (#167) proposing Route Segment 246. This route segment departs the Blue Route at Franklin Road and traverses north following the curve of the road. It continues north about 1,200 feet at the western border of T123N, R27W, S8 then continues northeast. It turns east at the halfway parallel of T35N, R30W, S32, then continues southeast at River Road SE following the curve of the road until it rejoins the Blue Line. The commenters noted potential impacts on public health/EMF/pacemaker, aesthetic impacts/property values, habitat/wildlife/rare species, and water resources.	Public

Name	Map	Type	Route Connection	Alternative Description	Source
247	2.17	Route Segment	Purple	EERA received a scoping comment from the MN DNR (#285) proposing Route Segment 247. This route segment departs the Purple Route halfway up the eastern border of T122N, R27W, S17 and traverses east about 1,000 feet. From there, it turns north until it reaches County Road 46, and continues east on County Road 46 until it rejoins the Purple Route. The DNR noted potential impacts on habitat/wildlife/rare species, water resources, and tree removal.	DNR
AA1	2.5	Alternative Alignment	Blue	EERA received a scoping comment from Tom Haak (#6) proposing Alternative Alignment 1. He recommended the alternative alignment to avoid RIM easements on his property.	Public
AA2	2.8	Alternative Alignment	(Neither) Route Connector 104	EERA received a scoping comment from Dennis Neimeyer (#258) proposing Alternative Alignment 2. He recommended the alternative alignment because it is more direct (less distance) and better avoids tree cover on his property which he notes is used for shelterbelt and CRP.	Public
AA3	2.17	Alternative Alignment	Purple	EERA received a scoping comment from Greg Potthoff (#82) proposing Alternative Alignment 3. He recommended the alternative alignment to minimize disruption to farming activities.	Public
AA4	2.4	Alternative Alignment	Purple	EERA received a scoping comment from John Welckle (#34) proposing Alternative Alignment 4. He recommended the alternative alignment to minimize farming activities. He specifically noted the alternative alignment would minimize impediment to large machinery maneuvering to accomplish modern farming.	Public

Attachment 2

Alternatives Not Recommended for Inclusion in the Scope of the EIS

Name	Type	Route Connection	Source
249	Route Segment	Blue	Public
250	Route Segment	Blue	Public
251	Route Segment	Purple	Public
116	Route Connector	Connects Blue and Purple Routes	Public
117	Route Connector	Connects Blue and Purple Routes	Public
252	Route Segment	Purple	Public
253	Route Segment	Purple	Public
118	Route Connector	Connects Blue and Purple Routes	Public
254	Route Segment	Blue	Public
255	Route Segment	Blue	Public
256	Route Segment	Blue	Public
257	Route Segment	Blue	Public
258	Route Segment	Blue	Public
259	Route Segment	Purple	Public
260	Route Segment	Purple	Public

Attachment 3

Alternative Maps

Overview

Map 1 Proposed Routes and Alternatives Overview

Alternatives Recommended for Inclusion in the EIS

Map 2 Scoping Alternatives Mapbook

Alternatives Not Recommended for Inclusion in the EIS

Map 3 Route Segments 259 and 260

Map 4 Route Segment 250

Map 5 Route Segment 251

Map 6 Route Segment 249

Map 7 Route Connector 116

Map 8 Route Connector 117

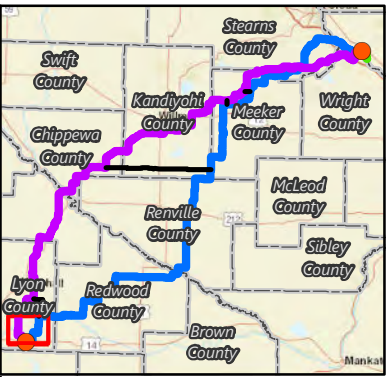
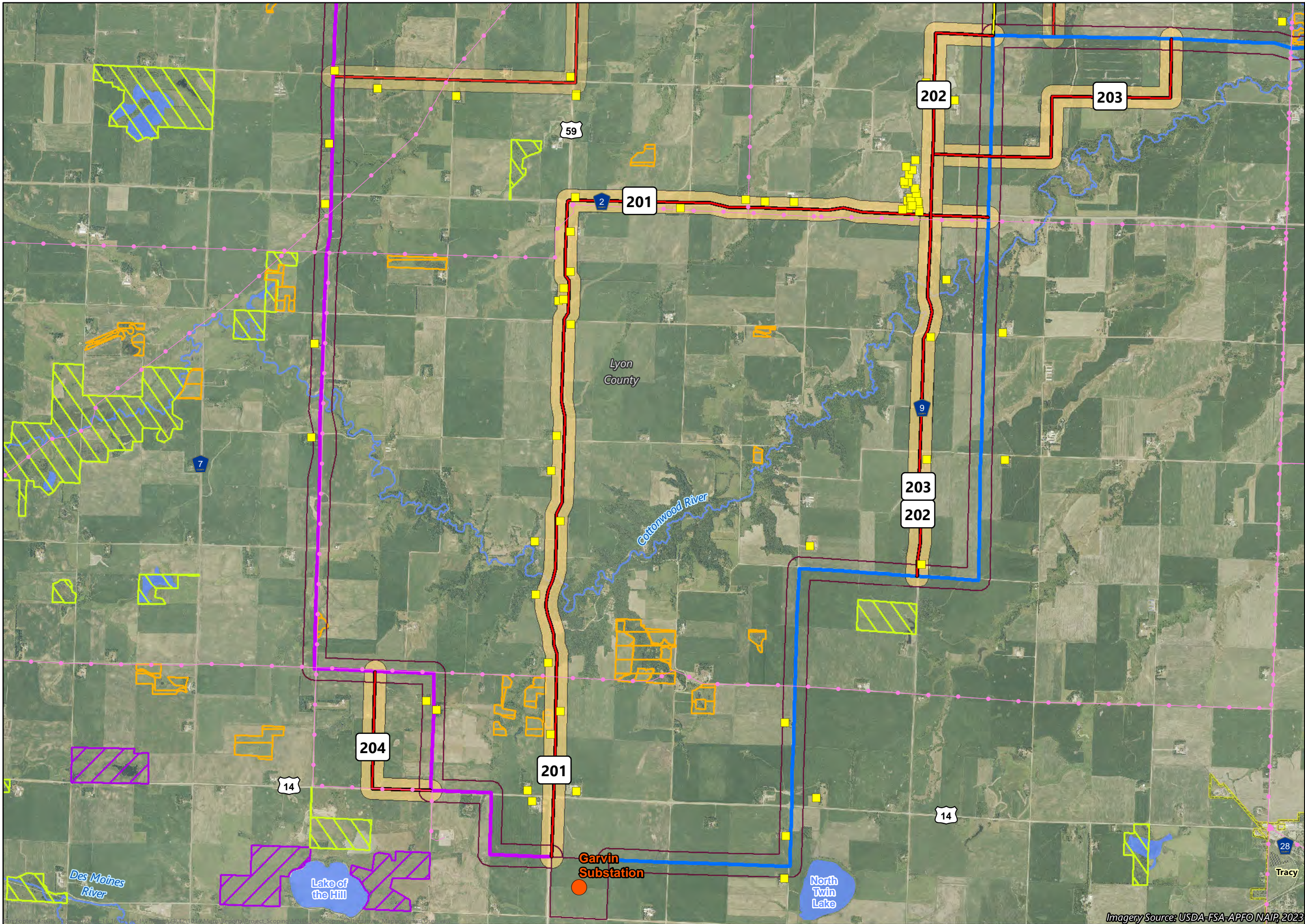
Map 9 Route Segment 252

Map 10 Route Segment 253

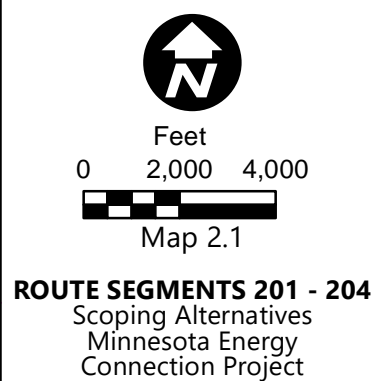
Map 11 Route Segment 118

Map 12 Route Segments 254, 255, 256, and 257

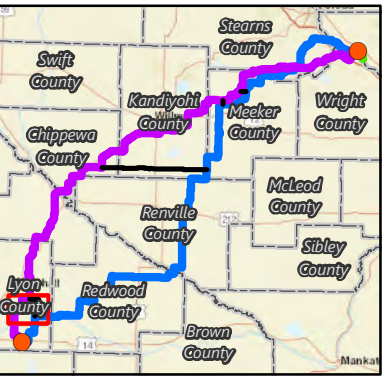
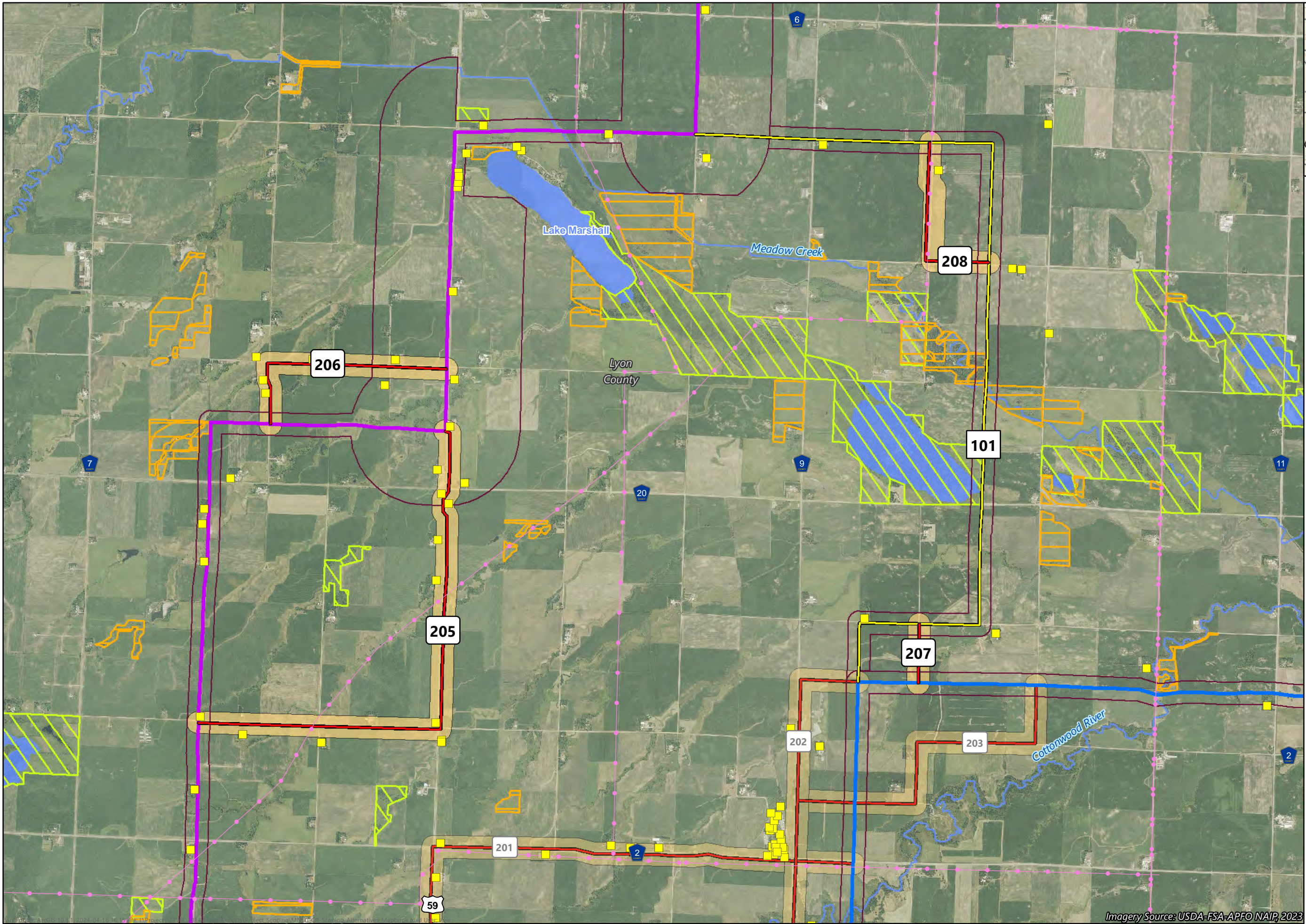
Map 13 Route Segment 258



- Proposed Routes**
- Blue Route
 - Purple Route
 - Route Connector
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Residence Location
 - Proposed Substation
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
 - PWI Basin
- Owner Type**
- Federal Land
 - State Land
 - Local Land



Imagery Source: USDA-FSA-APFO NAIP, 2023



- Proposed Routes**
- Blue Route
 - Purple Route
 - Route Connector
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Residence Location
 - Existing Transmission Line
 - PWI Waterway
 - PWI Basin
- Owner Type**
- State Land
 - Local Land

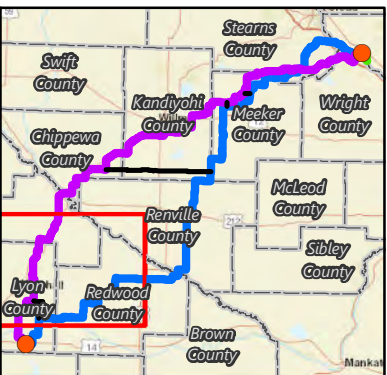
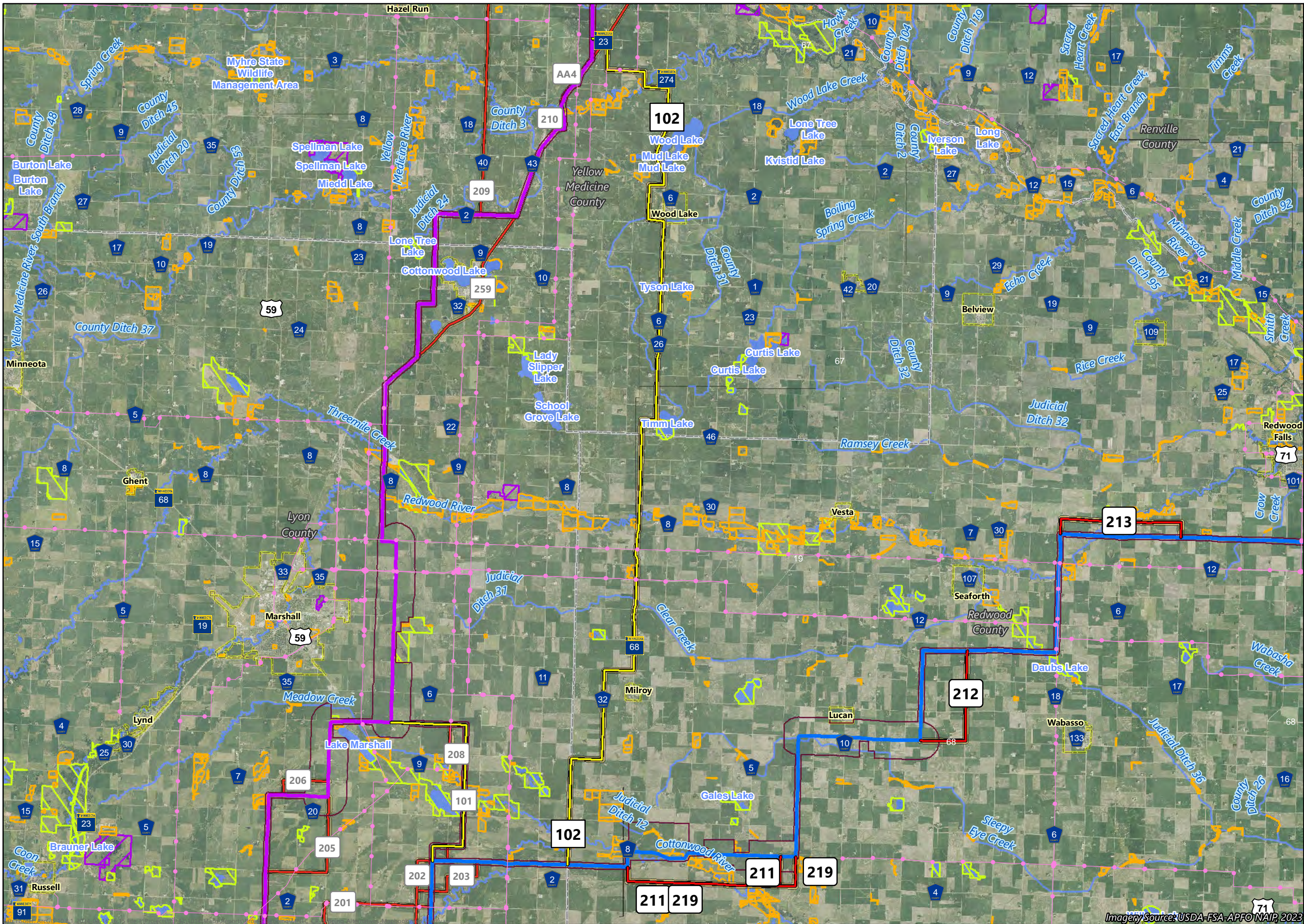
North Arrow

Feet
0 2,000 4,000

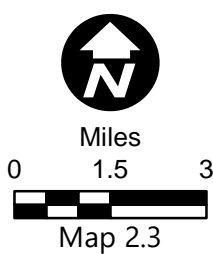
Map 2.2

**ROUTE CONNECTORS 101
ROUTE SEGMENTS 205 - 208**
Scoping Alternatives
Minnesota Energy
Connection Project

Imagery Source: USDA-FSA-APFO NAIP, 2023

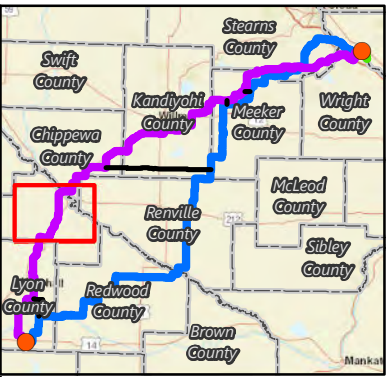
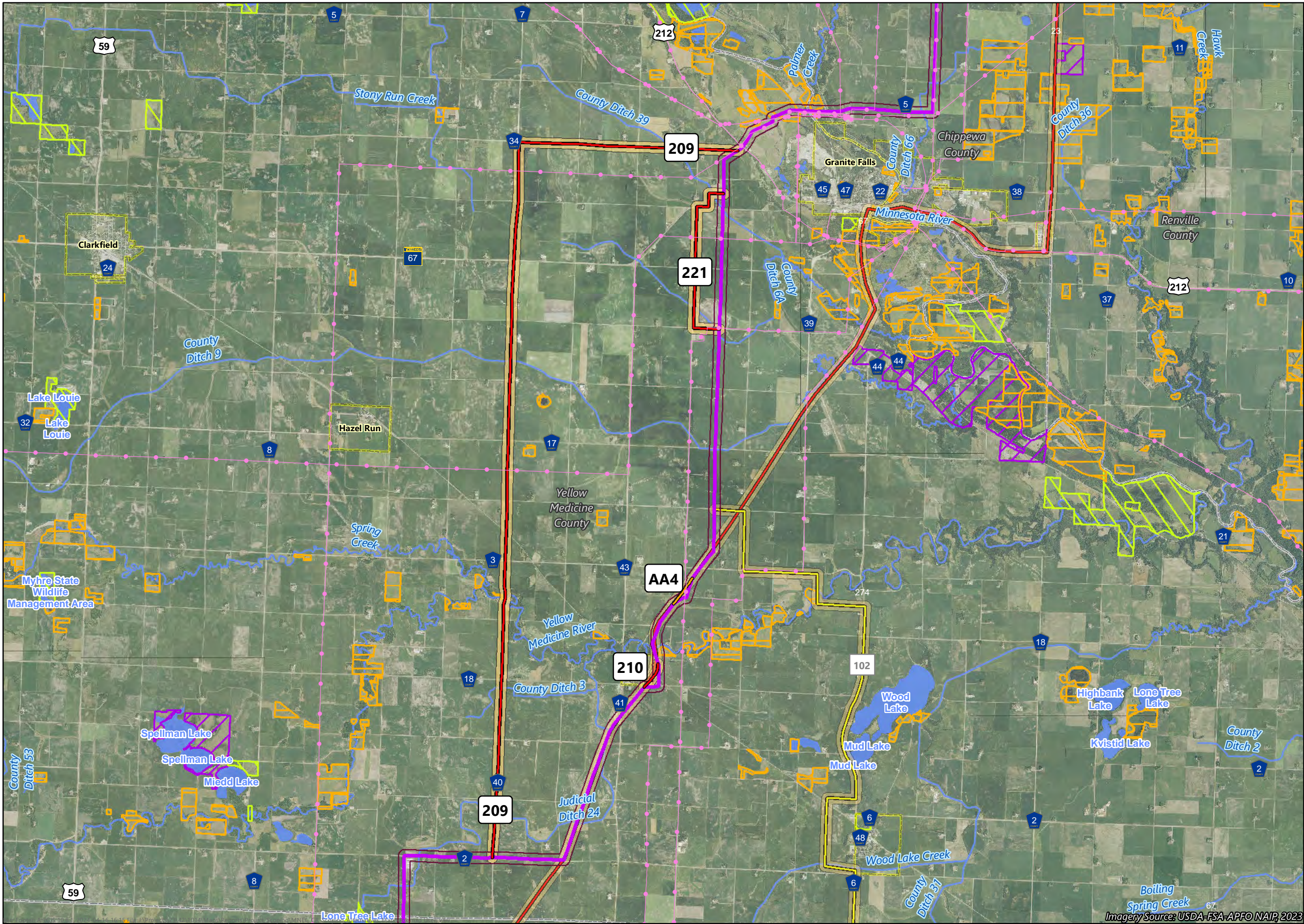


- Proposed Routes**
- Blue Route
 - Purple Route
 - Route Connector
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
 - PWI Basin
- Owner Type**
- Federal Land
 - State Land
 - Local Land

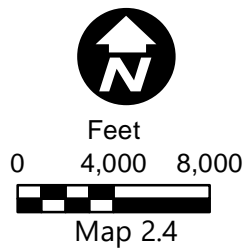


**ROUTE CONNECTOR 102
ROUTE SEGMENTS 211-213 &
219**
Scoping Alternatives
Minnesota Energy
Connection Project

Imagery Source: USDA-FSA-APO NAIP, 2023

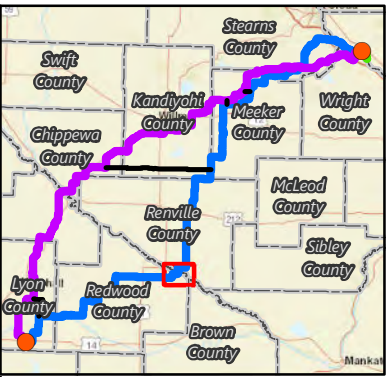
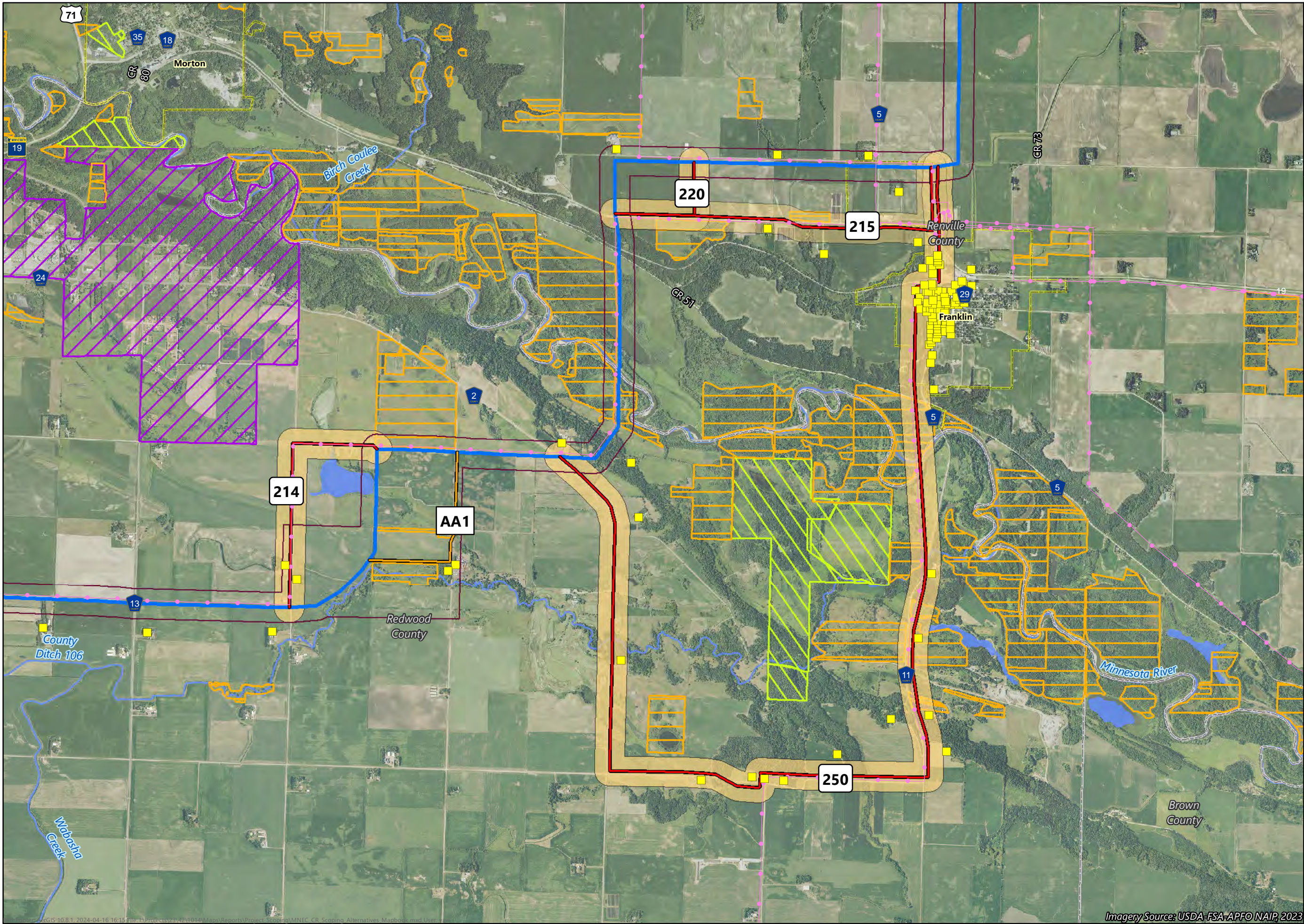


- Proposed Routes**
- Purple Route
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
 - PWI Basin
- Owner Type**
- Federal Land
 - State Land
 - Local Land

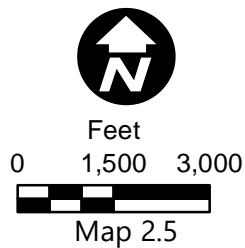


**ROUTE SEGMENTS 209, 210, & 221
ALIGNMENT ALTERNATIVE AA4**
Scoping Alternatives
Minnesota Energy
Connection Project

Imagery Source: USDA-FSA-APFO NAIP, 2023

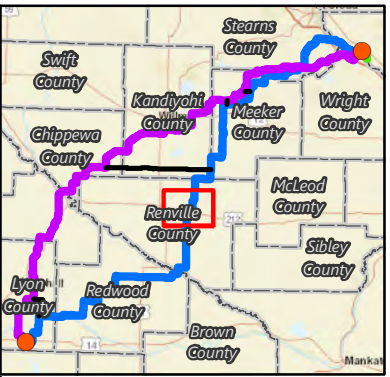
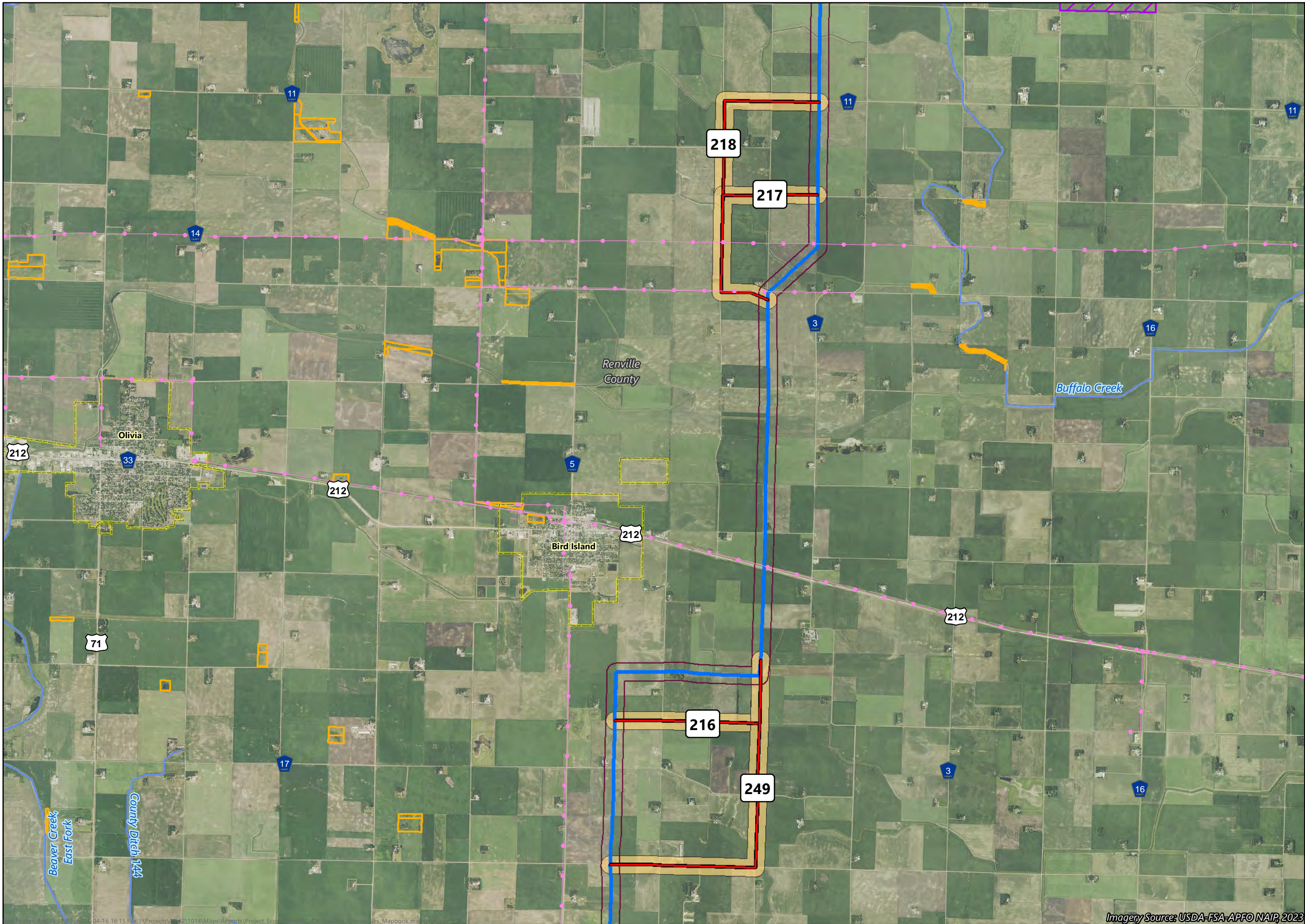


- Proposed Routes**
- Blue Route
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Residence Location
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
 - PWI Basin
- Owner Type**
- Federal Land
 - State Land
 - Local Land



ROUTE SEGMENTS 214, 215, 220, & 250
ALIGNMENT ALTERNATIVE AA1
Scoping Alternatives
Minnesota Energy
Connection Project

Imagery Source: USDA-FSA-APFO NAIP, 2023



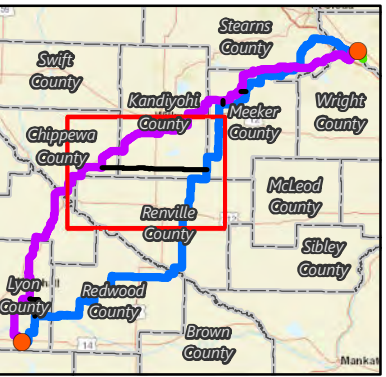
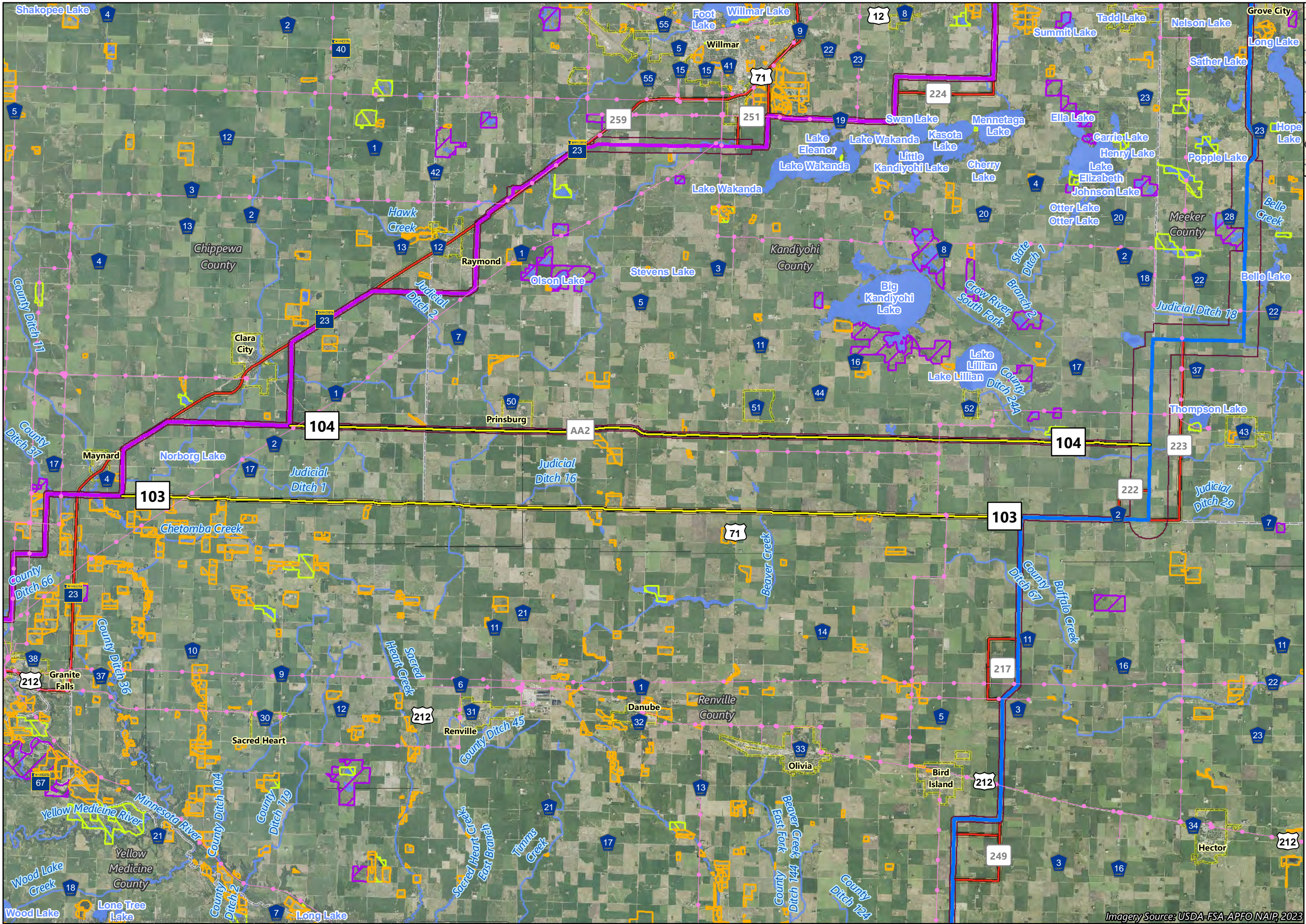
- Proposed Routes**
- Blue Route
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
- Owner Type**
- Federal Land
 - Local Land

Feet
0 2,500 5,000

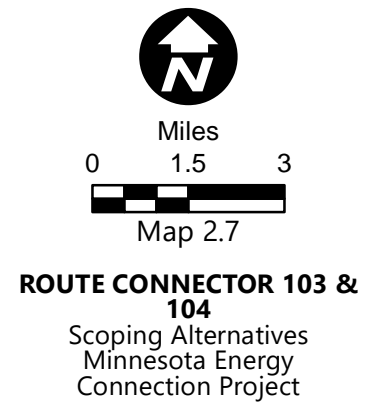
Map 2.6

ROUTE SEGMENTS 216 - 218, & 249
Scoping Alternatives
Minnesota Energy
Connection Project

Imagery Source: USDA-FSA-APFO NAIP, 2023



- Proposed Routes**
- Blue Route
 - Purple Route
 - Route Connector
 - Proposed Route Width
- Alternatives**
- Alignment
 - Route Connector
 - Route Segment
 - Alternative Width
 - Existing Transmission Line
 - Municipal Boundary
 - PWI Waterway
 - PWI Basin
- Owner Type**
- Federal Land
 - State Land
 - Local Land



Imagery Source: USDA-FSA-APFO NAIP, 2023