

This handout will help you suggest an alternative transmission line route for the Mankato to Mississippi River Transmission Project. More detailed information is available at: mn.gov/commerce/energyfacilities/. At the bottom of the webpage, under “Fact Sheets”, look for “How to Suggest Alternative Power Plant Sites and Transmission Line Routes”.

The Public Utilities Commission (Commission) permits high voltage transmission lines like the proposed Mankato to Mississippi River Transmission Project. Energy Environmental Review and Analysis (EERA) staff within the Department of Commerce assist the Commission by analyzing the potential human and environmental impacts of the proposed transmission line—a process known as environmental review. During the scoping comment period you can suggest alternative transmission line routes to be studied as part of the environmental review process.

Alternatives suggested during the scoping comment period that mitigate potential impacts and would assist the Commission in making a permit decision are carried forward in the environmental review process. If the Commission decides to issue a permit for the project, it can select the applicant’s proposed route, or an alternative route studied in the environmental review process, or a combination of the applicant’s route and studied routes.

The best alternative suggestions meet the following five criteria:

1. Accompanied by an explanation why the alternative should be carried forward;
2. Submitted during the public scoping period;
3. Able to meet the applicant’s stated need for the project;
4. Located outside prohibited areas; and
5. Feasible.

Provide a Detailed Explanation

Alternatives should be fully explained so that others do not have to “fill in the blanks” to understand your suggestion. The best explanations: describe an anticipated impact; suggest an alternative transmission line route; and discuss how the alternative mitigates the anticipated impact.

Describe the Impact

Alternatives must mitigate an anticipated impact to resources or unique features and be based on factual information. These impacts need not be on your property.

Explain what the concern is. Outline the anticipated impact—the problem or issue—created by the proposed transmission line route. Describe how “Route X” would affect “Resource/Unique Feature Y” at “Location Z.” Provide whatever information is necessary to explain the anticipated impact, for example, a photograph of the unique feature.

Provide an Alternative

Provide an alternative transmission line route. An alternative can replace an entire transmission line route or just a portion of it. Ensure the suggested alternative mitigates an impact as opposed to shifting the impact to a different location.

Explain where you think the transmission line should be located instead. Be as specific as possible. Use specific references to road intersections, mile markers, or other prominent landmarks. Ensure the explanation describes where your alternative breaks from and returns to the proposed route.

Statements such as “move the site to the east” or “place the route on the other side of the lake” do not point to specific locations and will not be carried forward. Ask a friend or family member to read your suggestion to see if they can identify it on a map. If they cannot locate your suggestion, ask what would make it more clear and include that information.

Describe this step as: my suggested “*Route Alternative A*” breaks from the proposed route at “*Location B*,” continues through “*Locations C and D*” and reconnects with the proposed route at “*Location E*”.

Explain Why the Alternative Mitigates the Impact

Explain how your alternative mitigates the impacts—reduces the issue or problem—identified previously. Describe how “*Route X*” mitigates or reduces the impact to “*Resource/ Unique Feature Y*” compared to original “*Route Z*”. Include information to support your rationale.

Use a Map

Maps are helpful to highlight an anticipated impact or mark a suggested alternative. A map should accompany a written description, not replace it. To be useful maps must be at a proper scale. At the wrong scale, a map will not provide enough detail to assist in pinpointing an impact or alternative. For example, the line created by a felt tip marker on a state highway map can cover entire cities.

We recommend that you include a map. Depending on the project, use a county, township, or city map. Free online mapping resources such as Google Maps or similar websites can be zoomed and printed to provide appropriate levels of detail. This function is also available through the interactive map viewer available on the EERA project webpage (URL below). If you are having trouble locating a map at the proper scale, ask us for help (contact information below).

Submit the Alternative On-time

Suggested alternatives must be post-marked or received electronically during the public scoping period. Alternatives received after the public scoping period would not meet this regulatory requirement.

Meet the Stated Need

The permitting process includes development of an environmental review document. The purpose of this document is to describe and analyze potential impacts and mitigation measures associated with meeting a specific need and accomplishing a specific task. For this reason, any alternative you suggest must also meet the identified need and accomplish the identified task. Take for example a fictitious transmission line project proposed to deliver electricity from Minneapolis to Duluth. A route alternative that ends in Hinckley does not meet the stated need because the electricity would not reach Duluth. This suggestion would not be carried forward.

Avoid Prohibited Areas

Transmission lines are prohibited in certain areas. If a suggestion is within one of these prohibited areas, it will not be carried forward. Table 1 outlines prohibited transmission line route locations. Exceptions and further requirements apply. Refer to Minnesota Rules 7850.4300 and 7850.4400 for complete text.

Table 1 Prohibited Transmission Line Route Locations

Prohibited	Prohibited UNLESS it would not materially damage or impair the purpose for which the area was designated AND no feasible and prudent alternative exists
National Wilderness Areas	National Parks
State Wilderness Areas	State Parks
—	State Scientific and Natural Areas

Propose a Feasible Alternative

Feasibility integrates the concepts of design, reliability, level of impact, and cost. Suggested alternatives must meet certain design requirements (codes and standards), achieve and maintain consistent power delivery (reliability), and provide for an efficient use of resources (level of impacts, cost). EERA staff, working with the applicant, determines the feasibility of suggested alternatives. Although you do not make this evaluation, you do need to consider it when constructing your alternative.

While we cannot explain what is and is not feasible without specific details, your best “feasibility test” is yourself: Does common sense tell you an alternative looks reasonable? Most people could agree an alternative that adds 10 miles to a 10-mile transmission line, effectively doubling both the impact and cost, is not feasible. However, an alternative that adds 10 miles to a 50-mile transmission line to mitigate specific impacts might be feasible.

Feasibility is not just about the location of an alternative. It is about finding an appropriate balance between the design, reliability, level of impact, and cost. Both relatively simple adjustments and significant alterations could be feasible depending on specific circumstances.

Where can you get more information?

For additional information or to ask specific questions do not hesitate to contact EERA staff directly. The environmental review manager for this project is listed below.

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EERA website: <https://mn.gov/commerce/energyfacilities/>

Mankato to Mississippi River Transmission Project webpage:
<https://apps.commerce.state.mn.us/web/project/15507>