

## ***Introduction***

This appendix provides a summary of the public meetings and public hearings, explains the methodology for receiving and organizing comments, and provides responses to comments received.

The Draft Environmental Impact Statement (DEIS) for the Hiawatha Transmission Line Project was published on January 8, 2010. Notice of the availability of the DEIS was sent to those persons on the Office of Energy Security's project contact and agency technical representative lists, and published in the Environmental Quality Board Monitor and newspapers of local circulation.

The OES distributed copies of the DEIS to those persons requesting individual copies, former members of the advisory task force, local libraries, and to those state agencies identified on the technical representatives list.

A public meeting on the DEIS was held on February 10, 2010, at Plaza Verde in Minneapolis, Minnesota. Based on sign-in sheets, the DEIS meeting was attended by more than 100 individuals. OES staff led the presentation and presided over the public meeting. The public was encouraged to provide oral comments at the public meeting and to submit written comments to the OES by March 10, 2010. A court reporter was present at the public meeting to ensure that all oral comments were recorded accurately.

## ***Methodology***

In preparing the Final EIS, the OES Energy Facility Permitting (EFP) staff considered all comments to the extent practicable. An identification number was assigned to each commenter, including those who expressed comments orally at the public meeting. Individuals who submitted comments in multiple separate submissions were assigned a separate commenter number for each submission. Each specific comment by the same commenter was assigned a sequential comment number; for example, Comment 41-3 refers to the 3<sup>rd</sup> comment by the commenter assigned as number 41.

Based on the comments received on the Draft EIS, the OES EFP prepared responses and modified the EIS where appropriate. The EIS was also revised based on OES EFP's internal technical and editorial review of the DEIS (i.e., changes made to the EIS that were not in response to a comment received).

Oral comments at the public meeting, as well as scanned images of the original comment documents in order by assigned commenter number, are included in their entirety in this chapter. The commenters and their comments are identified and labeled on each document image beginning with the public meeting oral comments. All comment documents on the DEIS, as included in this comment-response chapter, as well as any supporting attachments, have been entered into the administrative record for this docket. Individual responses for each comment are provided on the right side of each page in close proximity to the corresponding comment. In cases where subsequent comments address the same issue, references are made to the earlier comment number for appropriate responses.

Oral comments were given by 28 individuals at the DEIS public meeting; OES received 78 written comments during the public comment period. The table below provides a listing of the commenters, their assigned identification numbers, and their affiliations.

<b>Commenter Number</b>	<b>Commenter Name</b>	<b>Affiliation</b>
1	David Peterson	Chair of Longfellow Community Council Environmental and Transportation Committee
2	Leslie Ebbertt	Citizen
3	Linda Jensen	Citizen
4	Joseph Spangler	Citizen
5	Jim Howitt	Citizen
6	Mehmet Komar-Stenberg	Citizen
7	Angelina Matias-Vasquez	Employee of Women's Environmental Institute, Board of Greenway, and member of the Commission for Health for the Culture Women's Center Backyard Initiative
8	Scott Cramer	Co-chair Longfellow Business Association, Longfellow Community Council
9	Eric Hart	Longfellow Environmental Transportation Committee and representative of Midtown Greenway Coalition
10	Josh Tolkan	Citizen
11	Hillary Oppmann	Citizen
12	Joshua Houdek	Citizen
13	Amy Blumenshine	Citizen
14	Aaron Keith	Citizen
15	Ralph Jacobson	President, Minnesota Solar Energy Industry Association
16	Mark Ambroe	Citizen

**COMMENT RESPONSE DOCUMENT**

17	Sarah Graham	Little Earth United Tribes
18	Sue Ann Martinson	Citizen
19	Gerry Tyrrell	Corcoran Neighborhood Organization, Land Use and Transportation Committee
20	Liza Guerra O'Reilly	Citizen
21	Peter McLaughlin	Hennepin County Commissioner
22	Carol Pass	Citizen
23	Vivian Klauber	Citizen
24	Tim Springer	Midtown Greenway Coalition
25	Michael Troutman	Citizen
26	Amanda Dlouhy	Phillips West Neighborhood Association, Midtown Greenway Coalition
27	Aisha Gomez	Women's Environmental Institute
28	Karen Clark	State Representative
29	Sybil Axner	Citizen
30	Samuel Axner-Engel	Citizen
31	Wayne Bailey	Citizen
32	Pamela Barnard	Citizen
33	Bonnie Beckel	Citizen
34	Johannah Boemster	Citizen
35	KC Bretzke	Citizen
36	Don Browne	Citizen
37	Lorraine Bryant	Citizen
38	Mary Burns	Citizen
39	Mandala Catlette	Citizen
40	Winston Cavert	Citizen
41	Barbara Sporlein and Steven Kotke	City of Minneapolis, Community Planning and Economic Development and Department of Public Works
42	Christine Frank	Climate Crisis Coalition
43	Janet Court	Citizen
44	Niki Danou	Citizen
45	Jamie Schrenzel	Minnesota Department of Natural Resources
46	Peter Doughty	Citizen
47	Carol Ann Pass	East Phillips Improvement Coalition
48	Carol Ann Pass	East Phillips Improvement Coalition
49	Hanna Esparza	Citizen
50	Leslie Everett	Citizen
51	James Feldman	Citizen
52	Hannah Friedrich	Citizen
53	Adel Gardner	Citizen
54	Nancy Gehrenbeck-Miller	Citizen
55	Steve Gehrenbeck-Miller	Citizen
56	Cam Gordon	Minneapolis City Council Member
57	Ernie Gunderson	Citizen
58	Becky Hanson	Citizen
59	Allyson Hayward	Citizen
60	Matthew Hendricks	Citizen
61	Peter McLaughlin and Mark Stenglein	Hennepin County

**COMMENT RESPONSE DOCUMENT**

62	Joe Hesla	Citizen
63	Allan Hildenbrand	Citizen
64	Paul Hindemith	Citizen
65	Del Holmes	Citizen
66	Kate Hopper	Citizen
67	Thatcher Imboden	Citizen
68	Ryan Johnson	Citizen
69	Bruce Karstadt	American Swedish Institute
70	Andrew Koebrick	Citizen
71	Kim Kokett	Citizen
72	Sue Leskela	Citizen
73	Ann Lewandowski	Citizen
74	Robert Lilligren	Citizen
75	Kevin Loecke	Citizen
76	Longfellow Community Council, Environment and Transportation Committee	Longfellow Community Council, Environment and Transportation Committee
77	Thomas Manley	Citizen
78	George Mathews	Citizen
79	Terin Mayer	Citizen
80	Andrew McClure	Citizen
81	Margo McCreary	Citizen
82	Paula Goodman Maccabee	Midtown Greenway Coalition
83	David Seykora	MnDOT
84	Jesse Mortenson	Citizen
85	Hillary Oppmann	Citizen
86	Carol Overland	Citizen
87	Owen	Citizen
88	Ray Paulson	Citizen
89	Ray Paulson	Citizen
90	Silvia Perez	Citizen
91	Esther Perry	Citizen
92	Julia Philips	Citizen
93	Powderhorn Park Neighborhood Association	Powderhorn Park Neighborhood Association
94	Catherine Pususta	Citizen
95	Eric Refsell	Citizen
96	Elizabeth Schmiesing	Wells Fargo Bank
97	Joseph Spangler	Citizen
98	Jane Thomson	Citizen
99	Lou Tofte	Citizen
100	Brit Tracy	Citizen
101	Ralph Watkins	Citizen
102	David West	Citizen
103	Miriam West	Citizen
104	David Woolley	Citizen
105	Vincent Wyckoff	Citizen
106	RaeLynn Asah	Xcel Energy

1

1 PUBLIC MEETING - FEBRUARY 10, 2010

2

3

4 In the Matter of the Northern States Power Company  
 (Xcel Energy) High Voltage Transmission Line Route Permit  
 5 Application

6

7 Hiawatha Transmission Line Project

8

9

10 PUC DOCKET NO: E002/TL-09-38

11

12 Plaza Verde  
 1516 East Lake Street  
 13 Minneapolis, Minnesota 55407

14

15

16

17 Met, pursuant to notice, at 6:00 in the evening  
 18 on February 10, 2010.

19

20

21

22 \* \* \*

23

24

25

2

I N D E X

WITNESS	PAGE
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
David Peterson	17
Leslie Ebbertt	22
Linda Jensen	23
Joseph Spangler	27
Jim Howitt	29
Mehmet Komar-Stenberg	32
Angelina Matias-Vasquez	34
Scott Cramer	36
Eric Hart	39
Josh Tolkan	40
Hillary Oppmann	43
Joshua Houdek	46
Amy Blumenshine	48
Aaron Keith	50
Ralph Jacobson	56
Mark Ambroe	59
Sarah Graham	62
Sue Ann Martinson	64
Gerry Tyrrell	67
Liza O'Reilly	69
Peter McLaughlin	73
Carol Pass	79
Vivian Klauber	86
Tim Springer	88
Michael Troutman	92
Amanda Dlouhy	95
Aishagomez	97
Karen Clark	104

1 MR. STORM: Okay. I'd like to start the  
2 program tonight so that we can get to the reason  
3 we're here, that is, your comments basically.

4 I want to thank you all for coming out.  
5 I know it's cold out there, and I do appreciate your  
6 participation.

7 My name is Bill Storm. Many of you may  
8 remember me from the initial public meeting and the  
9 scoping meeting we had a few months ago. I am the  
10 project manager for the Hiawatha high voltage  
11 transmission line project for the Office of Energy  
12 Security.

13 The Office of Energy Security is located  
14 within the Department of Commerce. And what we do  
15 is we serve as a technical consultant or technical  
16 support for the Public Utilities Commission. The  
17 Public Utilities Commission is a five-member  
18 commission who is charged with the responsibility  
19 for permitting high voltage transmission lines, in  
20 this case high voltage transmission line.

21 Tonight's meeting is to collect public  
22 comment on the draft environmental impact statement  
23 that the Office of Energy Security released on  
24 January 8th. Again, the project is the Hiawatha  
25 high voltage transmission line project. The docket

1 number -- the PUC Docket Number is E002/TL-09-38.

2 I want to go over a little bit of  
3 tonight's agenda. My presentation is going to be  
4 real short, again because I want to get to the  
5 reason we're here and that is to take your public  
6 comments on the draft environmental impact  
7 statement.

8 As I said, I am Bill Storm, the project  
9 manager for this project inside the Office of Energy  
10 Security, which is located within the Department of  
11 Commerce.

12 Before I start, I want to point out that  
13 there are some materials on the front table that you  
14 may be interested in. There are a couple of fact  
15 sheets. One fact sheet explains the permitting  
16 process. The other fact sheet outlines how the  
17 public can participate and what options the public  
18 has for participating in that process.

19 There is a copy of my slides on the  
20 table. Like I said, it's going to be a short  
21 presentation, seven or eight slides, something like  
22 that. So there's a copy of that up on the front  
23 table.

24 As I said, we're here to take comments on  
25 the draft environmental impact statement tonight.

1 When I'm done giving my presentation, I will call on  
2 members of the public to come up to the microphone  
3 and speak. We have a court reporter who will be  
4 taking a transcript so we'll get exactly what you  
5 have to say in the record.

6 If you would like to speak, what I ask  
7 you to do is fill out one of these yellow cards and  
8 give it to Deb; and after my presentation, I will  
9 call on people in the order that we receive the  
10 cards. Once I run through the cards, then I will  
11 call on people via show of hands if there's anybody  
12 else who would like to speak.

13 We have the draft environmental impact  
14 statement, which is the subject of tonight's  
15 presentation. We have it on disk that's available,  
16 and we have hard copies. So if you haven't gotten  
17 one yet and you want a copy, see me during a break  
18 or after the presentation and I'll give you a copy.  
19 One thing I'll say is the hard copies are in short  
20 supply because we're trying to conserve the  
21 resource. So if you -- if you're really going to  
22 benefit from having one, don't hesitate to ask for  
23 one, but try to be conservative about it. We also  
24 do have it on disk. And the document is also online  
25 at our website, and I will go through that at the

1 end of my presentation.

2 If you want to jot some comments down, we  
3 have a blank comment sheet up on the table, and  
4 there's a drop box for these. These can also be  
5 mailed or faxed to me.

6 Following tonight's meeting, we will  
7 leave the comment period open until March 10th. So  
8 you have until March 10th to submit comments to me.  
9 And you don't have to submit them on this  
10 stationery. You can use your own stationery. You  
11 can e-mail me, and you can also comment through our  
12 website. And I will go through that at the end of  
13 the presentation.

14 So, as I said, Bill Storm, Office of  
15 Energy Security. At the table there is Deb Pile.  
16 She is the public advisor for this project. She's  
17 also my unit manager for the project. Next to her  
18 is William Glahn. He is the director of the Office  
19 of Energy Security. In the audience I think we have  
20 Trish DeBleekere from the PUC staff. The PUC is  
21 the ultimate decision-making body for this docket  
22 for this process. And then there are  
23 representatives from Xcel Energy in the back  
24 floating around with some of the easel poster  
25 boards.

1           Okay. Then I'm going to give a short  
2 presentation basically on what we've done to date on  
3 this -- on this docket and what we have to do in the  
4 future going forward. And then, after that, we come  
5 to the part why we're really here tonight, and that  
6 is to take public comment on the draft environmental  
7 impact statement.

8           Okay. Some of you may have -- this slide  
9 may look familiar to some of you who attended the  
10 initial public information meeting and the scoping  
11 meeting that we had earlier. Also, if you attended  
12 the task force meeting -- we had a task force for  
13 this particular project -- you may -- this slide may  
14 be familiar to you. I just want to run through it  
15 real quickly. This is basically a slide of the full  
16 permit review process for a high voltage  
17 transmission line that comes before the PUC, the  
18 Public Utilities Commission.

19           The process starts out with the  
20 submitting of an application. The applicant in this  
21 case, Xcel. And in this case Xcel wants to build  
22 two substations and two 115 lines in the Midtown  
23 area. They submit an application to the Public  
24 Utilities Commission. The Public Utilities  
25 Commission has ten days to review the application

1           and to either accept or reject the application. In  
2 this case they accepted the application; and it  
3 moved to the next step, application accepted.

4           When they accepted the application,  
5 they -- under rule in accepting the application,  
6 they authorize the OES, my group, to appoint a  
7 public advisor, and we did, Ms. Deb Pile. They also  
8 authorized us to form a task force, which we did,  
9 and we had a task force. The task force met three  
10 times and then issued a report.

11           After the application is accepted, we  
12 have a public information meeting. The public  
13 information meeting is an opportunity for OES to let  
14 the public know what the process is, what the  
15 permitting process is, how they can participate, and  
16 also to solicit input on what the public would like  
17 to see in the scope. Okay? We had the public  
18 meeting. We had a comment period following that  
19 meeting, ten-day comment period. I received your  
20 comments.

21           The next step was I developed a scoping  
22 recommendation and gave it to my director,  
23 Mr. Glahn. Mr. Glahn reviewed it and ended up  
24 signing and releasing the scoping decision. The  
25 scoping decision outlines what alternatives and what

1 issues, areas and impacts and mitigations will be  
2 covered in the draft environmental impact statement.

3           Once the scoping decision is signed, we  
4 begin working on the draft environmental impact  
5 statement. We did that. We released the draft  
6 environmental impact statement on January 8th. We  
7 let it out there for a minimal 20 days before we  
8 have tonight's meeting. That's to give the public  
9 an opportunity to review the draft environmental  
10 impact statement and now to come and comment on it.

11           Tonight is your opportunity to comment on  
12 the draft environmental impact statement, and that  
13 opportunity extends from tonight until March 10th.  
14 So I ask if you have comments, please tonight  
15 comment on the record. Or if you're not comfortable  
16 talking in public or you want to think about it more  
17 or you're just getting into the draft environmental  
18 impact statement, you have until March 10th to  
19 submit comments to me on the draft environmental  
20 impact statement. And where we're at is we're  
21 looking for comments on the draft environmental  
22 impact statement that -- in areas -- where you feel  
23 areas that are unclear that you need clarification  
24 on, areas where you think it's deficient and needs  
25 to be fleshed out more. So those are the types of

1 comments that we're looking for you to give us.

2           Following the comment period, which ends  
3 on March 10th for the draft environmental impact  
4 statement, a contested case hearing will be held on  
5 this docket. The contested case hearing consists of  
6 two parts, a public hearing and an evidentiary  
7 hearing. The -- it's presided over by an ALJ,  
8 administrative law judge. In this case the ALJ is  
9 Beverly Heydinger.

10           As I said, a contested case hearing has  
11 two parts, a public hearing and an evidentiary  
12 hearing. The public hearing is another  
13 opportunity -- and as you can see in the chart,  
14 areas -- milestones that allow public participation,  
15 which are avenues for public participation, have a  
16 little asterisk by them. You see the public meeting  
17 is the first one, the contested case hearing is  
18 another one, this draft environmental impact meeting  
19 is another one. So at the contested case hearing  
20 they will be held in two parts, the public hearing  
21 and the evidentiary hearing.

22           Following the contested case hearing, I  
23 will finish the -- I will finish the final  
24 environmental impact statement, and I will submit  
25 that into the record. The environmental impact

1 statement basically is the comments I receive  
 2 tonight and the comments I receive during the  
 3 comment period from the public, from local units of  
 4 government, from other state agencies, and my  
 5 response to those comments. And that response may  
 6 be a simple yes or no or a simple clarification of  
 7 something or it may actually be where I go back to  
 8 the drawing board, think about the comment I got, do  
 9 some more research, and actually re -- edit or  
 10 rewrite a section of the environmental impact  
 11 statement.

12 So the contested case hearing comes to a  
 13 close. I submit the final EIS into the record. The  
 14 next step is that the judge will release a report.  
 15 Now, the judge will take the application, the  
 16 comments received during scoping, the comments  
 17 received through the draft EIS process, the final  
 18 EIS, and she will release a report. And her report  
 19 will have findings of fact, conclusions, and a  
 20 recommendation for the PUC.

21 Once she's done with that report, the  
 22 record comes back to the PUC and OES, and I will  
 23 present the document in front of the PUC for a final  
 24 decision. At that time the PUC has three decision  
 25 points to make: One, is the environmental impact

1 statement in the record adequate; two, should a  
 2 route permit be granted to Xcel; and, three, what  
 3 route should be selected, what position should be  
 4 put on that permit.

5 And, again, this is the same milestones,  
 6 just with the dates filled in. As you can see, the  
 7 application was submitted April 24th, '09. We moved  
 8 through the process to where we are tonight, which  
 9 is the draft EIS public meeting.

10 Moving forward from here, we have the  
 11 contested case hearing, which again has two parts,  
 12 the public hearing and the evidentiary hearing. And  
 13 right now the public hearing is scheduled for  
 14 April 5th and 6th of this year, and then the  
 15 evidentiary hearing is scheduled for April 12th and  
 16 then it extends out about two-and-a-half weeks,  
 17 depending on how long it takes for the formal  
 18 parties to go through putting witnesses on the stand  
 19 and crossing them. The ALJ's report and the final  
 20 decision are yet to be determined. The process is  
 21 designed to take one year from acceptance of the  
 22 application till completion to final decision.

23 If you're interested in tracking the  
 24 various documents that make up the record, there are  
 25 two ways you can do that. The first way is going to

1 the energy facility permitting website. That's a  
2 website that OES staff maintains for the PUC. And  
3 on that website, if you go to this URL, which will  
4 take you right into the docket page for this  
5 docket -- there are many dockets on the web page,  
6 but this URL will take you to the Hiawatha docket,  
7 on that page you will see a filed register, which is  
8 basically a list of the documents that make up the  
9 record for this process, this docket. They include  
10 the application; the scoping decision; the meetings  
11 (sic) I got from the scoping meeting, the public  
12 scoping meeting; the draft EIS; the comments that I  
13 receive from the draft EIS will be on there. So the  
14 paper trail that makes up the record will be located  
15 on that website. And they're PFD (sic), so you can  
16 go there -- if you want to look at the draft  
17 environmental statement, it's on that website. You  
18 go down the list and find environmental impact  
19 statement, click it, and it opens up to the draft  
20 environmental impact statement, which is broken into  
21 sections so that you can deal with it reasonably by  
22 section. And they're in PDF, so you can pull them  
23 down and look at them.

24 There's a second website that you can  
25 look at if you want to see the official record. Our

1 website that we maintain at OES not only has the  
2 official record but it will have other stuff in it.  
3 Anything that I think is useful to the public, I'll  
4 put up there that's relative to this docket.

5 The second URL, which is the e-dockets  
6 website, is the official record for this docket.  
7 And, again, you'll find the application in there,  
8 you'll find the scoping decision, you'll find the  
9 draft environmental impact statement in there, and  
10 the other -- public comments and other things that  
11 make up the record.

12 If you go to the e-dockets, you have to  
13 go to that URL that's listed up there, select search  
14 e-dockets, and then you need to enter the year and  
15 the number for this particular docket. And as I  
16 said in the beginning, the number for this docket is  
17 09, which represents the year, and then 38, which is  
18 just a case number.

19 Okay. Before I turn it over to take  
20 public comment on the draft EIS, I just want to go  
21 over a little bit of structure so that the meeting  
22 doesn't go off into the ditch, so to speak. I ask  
23 that -- again, what I will do is I will call on  
24 people based on cards that were submitted. I ask  
25 that you limit yourself to five minutes to speak.

1           The second item is this is not a Q -- we  
2           don't have this set up as a Q and A format because  
3           it would just take many, many days if we did it that  
4           way. What we ask, if you have a comment or a  
5           question, we ask that you just come up to the mic,  
6           state it for the record, the court reporter will  
7           take it down, and then we will respond to that when  
8           we put together the final EIS. So I try to stay  
9           away from a Q and A format. If you have a minor  
10          clarification question, I might have the latitude to  
11          deal with that. But given the size of the crowd we  
12          have here tonight, I'd like to sort of stay away  
13          from the Q and A type sessions.

14          Once I get through the cards, then I will  
15          ask if there's anybody else that wants to speak by  
16          show of hands, I'll call on you, come up to the mic  
17          and speak. Once we get through that, then I'll --  
18          then we can come back to if you spoke and you want  
19          to speak again, somebody jogged something in your  
20          mind or what somebody said triggered something new  
21          that you want to say, I'll give you another  
22          opportunity to speak.

23          Okay. Since we have a court reporter  
24          here because we want to keep official record of the  
25          comments we get tonight so that we can respond to

1           them accurately in the final EIS, when you step up  
2           to the mic, I ask that you please state your name  
3           and spell your name for the court reporter and  
4           probably talk slower than I've been talking tonight  
5           so that the court reporter can keep up with you.

6           Your comments should be specific to the  
7           draft environmental impact statement. So if there's  
8           an area in the impact statement -- in the draft  
9           environmental impact statement that you don't think  
10          went into enough depth, that's what we want to hear.  
11          We want to hear, Bill, you didn't cover this aspect  
12          of EMF the way -- the area that I want you to or you  
13          didn't drill deep enough on another aspect of the  
14          document. So that's what we're trying to get at.  
15          We're trying to make the document better, and we're  
16          seeking your assistance in pointing us in the right  
17          direction to make that document better so that when  
18          the final comes out, it's even that much better of a  
19          document.

20          You can -- as I said, the comment period  
21          is open till March 10th. You can comment, as I  
22          said, with the comment sheets that we have on the  
23          desk there. You can e-mail me or write me on your  
24          own stationery. But you can also comment via the  
25          website. And I know some of you have done that

## Commenter 1 – David Peterson

## Responses

17

1 already because I've received them already. If you  
2 go to that website, the first website that I listed  
3 on that slide to this docket, you will see there is  
4 an option for comment; and you select that button  
5 and it will give you a sheet that let's you comment  
6 on, you hit submit, and it gets sent to my computer.

7 Just a reminder, you have until  
8 March 10th to comment. This is not your only  
9 opportunity to comment here tonight. You can, as I  
10 said, snail mail me, e-mail me, fax me, or comment  
11 via the website.

12 So, with that, I'm going to take public  
13 comments.

14 MS. PILE: Anybody else have any cards  
15 you want me to pick up?

16 (Off the record.)

17 MR. STORM: Okay. David Peterson. Would  
18 you please step to the mic, state and spell your  
19 name?

20 MR. PETERSON: Sure. My name is David  
21 Peterson. D-A-V-I-D. P-E-T-E-R-S-O-N. I'm the  
22 chair of the Longfellow Community Council  
23 Environmental and Transportation Committee. And I  
24 wanted to mention, I do work for the city in the  
25 pedestrians and bicycle program. And I want to

**Commenter 1 – David Peterson**

1 mention I do go out on the Greenway, and there are  
2 for a number of people who are bicycling on the  
3 Greenway. And I think we need to remember whenever  
4 we discuss the Greenway, it is by far the most used  
5 bicycle trail in the city of Minneapolis, in  
6 Minnesota, and probably one of the most used bicycle  
7 trails in the country as well.

8 So members of the Environment and  
9 Transportation Committee have reviewed the DEIS with  
10 respect to how the proposed project will affect  
11 environmental and transportation resources in the  
12 Longfellow neighborhood and have prepared these  
13 comments. Our comments will focus on the portion of  
14 the DEIS that deals with the Hiawatha substation.

15 Several hundred native trees and shrubs  
16 were planted on the east side of Hiawatha around the  
17 Midtown Greenway and surrounding the eastern  
18 approach to the Sabo Bridge. Nearly 1,000 hours of  
19 volunteer time were put into this project for two  
20 Arbor Day celebrations.

21 Over half of this developed park space  
22 could be destroyed if Xcel's preferred location for  
23 the Hiawatha West substation is granted. The  
24 destruction of this developed park space was not  
25 adequately analyzed in the DEIS. It was hardly even

**Responses**

**Comment 1-1**

Text in Sections 5.2.1.3 and 5.2.2.2 has been supplemented to include information on the MnDOT Community Roadside Landscaping Program and tree plantings at the Hiawatha Substation locations.

1-1

**Commenter 1 – David Peterson**

**Responses**

1-1

19

1 mentioned. Details of the sections where it needs  
2 to be analyzed will be included in the written  
3 comments. The major impacts that we identified of  
4 the preferred Hiawatha West substation include:  
5 Parks and recreation. Both the Midtown  
6 Greenway and the Hiawatha Avenue corridors have been  
7 identified as residential growth corridors as  
8 industrial uses leave the area. With this  
9 increasing residential population, there's a need  
10 for additional park land and tree cover. This need  
11 has been identified in both the Minneapolis Park and  
12 Recreation Board Comprehensive Plan and the  
13 Seward/Longfellow Greenway Area Land Use and  
14 Predevelopment Study.  
15 Flora. The project as proposed would  
16 remove many trees and shrubs and resulting in loss  
17 of the land use that trees provide. It will be  
18 impossible to restore a vast majority of the  
19 vegetation lost, given the current footprint of the  
20 proposed substation. Other mitigation measures need  
21 to be presented.  
22 For urban forestry. The project as  
23 proposed would remove a large number of trees that  
24 contribute to Minneapolis; urban forest, which is  
25 more than just street trees in residential areas.

1-2

**Comment 1-2**

A discussion of the potential impacts to flora appears in Section 5.10 of the EIS.

**Commenter 1 – David Peterson**

**Responses**

1-3

1 No mitigation for this loss is included in the DEIS.

20

1-4

2 For air quality. The loss of trees and  
3 shrubs that provide carbon sequestration and other  
4 pollution-removing benefits would occur. This is  
5 especially important to consider in this part of the  
6 city with little vegetation and a large number of  
7 transportation and industrial pollution sources.

1-5

8 For aesthetics. This area has been  
9 planted with trees and shrubs, in part, to improve  
10 aesthetics. And the substation will remove those  
11 beneficial resources and replace them with far less  
12 pleasing, a precast wall, elevated power lines, and  
13 tall utility poles. Restoration for the majority of  
14 vegetation would be impossible.

1-6

15 We also identify several omissions.  
16 First, simulated views provided in the  
17 DEIS of the Hiawatha West substation are missing two  
18 key views; from the elevated land rail track at 28th  
19 Street north and southeast, and the Midtown Greenway  
20 directly to the north of the proposed substation  
21 looking south. The current views omit the view of  
22 two key groups that will see the substation; bike  
23 trail riders from the elevated tracks and people in  
24 the Midtown Greenway paths.

1-7

25 For the land use map, Figure 5.2-1, this

**Comment 1-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 1-4**

A discussion of carbon sequestration appears in Section 5.13.2 of the EIS.

**Comment 1-5**

A discussion of the aesthetics and the removal of trees and vegetation appears in Section 5.8.2 of the EIS.

**Comment 1-6**

Simulated views of the substations and transmission line route alternatives are presented in Figures 5.8-3 through 5.8-21. These figures provide similar views of the substations as those requested. Due to the uniform substation walls proposed for all four sides of each substation, views and resulting impacts from each vantage surrounding the substations would be similar.

**Comment 1-7**

Text in Sections 5.2.1.3 and 5.2.2.2 has been modified and supplemented with information on the tree plantings at the Hiawatha West Substation location. The Hiawatha West Substation location is owned in fee title by MnDOT, who has indicated that this plot of land could be considered surplus and sold.

**Commenter 1 – David Peterson**

**Responses**

1-7

21

1 omits parks -- sorry, it omits parks, recreation, or  
2 preserve designation for the Midtown Greenway east  
3 of Hiawatha Avenue -- this is not true of -- it is  
4 representative of Greenway west of Hiawatha  
5 Avenue -- an area on the east side of Hiawatha going  
6 from Hiawatha Avenue on the west, the industrial  
7 park on the east, the Sabo Bridge on the north, and  
8 the railroad tracks to the south. This is the park  
9 space, which I mentioned before. That is not shown  
10 as parks, recreation, or reserve.

1-8

11 The substation will have local  
12 distribution lines leading from it. The impacts of  
13 these lines were not analyzed at all, and they need  
14 to be.

1-9

15 And, finally, a key land use planning  
16 document for the area, the East Revival Plan, was  
17 not included or analyzed in the DEIS. This was  
18 completed in 1999 and identified the need for park  
19 land and green space in this area.

20 The Environment of Transportation  
21 Committee of Longfellow Community Council requests  
22 that the EIS thoroughly address all potential  
23 impacts to the vegetated park and open space to be  
24 removed by the proposed Hiawatha West substation as  
25 well as the omissions we have identified.

**Comment 1-8**

Distribution lines of 100 kV or less are not regulated by the Public Utilities Commission (PUC). The Applicant submitted an application for a route permit to the PUC to construct two new distribution substations and two 115 kV transmission lines, which are evaluated in the EIS.

**Comment 1-9**

Text in Section 5.2.1.3 has been supplemented to include the East End Revival Plan under Other Small Area Plans.

**Commenter 2 – Leslie Ebbertt**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Thanks.

MR. STORM: Leslie Ebbertt. Please state your name and spell it.

MR. EBBERTT: Leslie, L-E-S-L-I-E. Ebbertt, E-B-B-E-R-T-T. I am a frequent user of the bike -- I'm a frequent biker of the Greenway. And looking -- so my interest is, of course, visual impact. And I'm concerned that this being a Greenway --

COURT REPORTER: Excuse me. Bill, could he use your microphone?

(Off the record.)

MR. EBBERTT: As I said, I'm a frequent user of the Greenway biking, and I'm concerned that turning essentially a parkway into the type of urban jungle is not in my interest. Page 270 of the EIS says, last paragraph, The overhead lines would pose an aesthetic impact to recreation in the Greenway. That's true, but it's really an understatement.

And on the next page, 271, The presence of transmission line structures may have a negative effect on the overall experience, perception, and sentiment associated with using the Greenway. I think that's a strong understatement, and I'd like to see some better analysis and some numbers with

**Responses**

**Comment 2-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

2-1

**Commenter 3 – Linda Jensen**

**Responses**

2-1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

that.

Thank you.

MR. STORM: Linda Jensen, please.

MS. JENSEN: My name is Linda Jensen. I am a resident four blocks from here. I've been in South Minneapolis neighborhood now for just over a year. I moved here because of the Greenway, and so I thought I'd use this as an opportunity to explain the concerns that I had and ask that the EIS emphasize those issues a bit more.

I agree about the last comment about the park space. In making the choice to move to this area -- I lived in south Minneapolis on 32nd Street 25 years ago, spent many years in St. Paul, and came back here because for a short time I was renting a unit in the Uptown area and discovered the Greenway. It is a wonderful park space with, in addition to the lakes, a principal form of recreation for bikers and rollerbladers and walkers and hikers, and our family uses it extensively.

In addition, when I reached the point in my life where I didn't want to rent anymore and wanted to buy a home, I instructed my realtor to look for a location within easy walking distance, six to eight blocks at most, from the Greenway

**Commenter 3 – Linda Jensen**

1 running across South Minneapolis. And part of the  
2 reason for that is that that's where the economic  
3 development is occurring, in South Minneapolis.

4 The change that I've seen in the last  
5 couple of decades is that there is substantial  
6 housing development running from Hennepin over to  
7 Lyndale and now stretching further toward the east,  
8 four-story condominium and apartment units, that if  
9 there were high voltage power lines, that would be  
10 the view looking out those folks' windows of these  
11 nice new developments. And that's the principal  
12 residential development occurring in this area, and  
13 that's driving business development.

14 And I guess I didn't appreciate a long  
15 time ago when the Greenway was put in how important  
16 it would be. It's real obvious when you go through  
17 the neighborhood now that that is a real driver of  
18 economic development, because of the houses being  
19 built and because it impacts the broader development  
20 of the area. And that's especially important.  
21 Given our housing situation with depressed economic  
22 circumstances, it seems shortsighted to have a high  
23 voltage power line running through a principal  
24 aesthetic space outside the prin -- the area where  
25 people are coming in order to enjoy that space.

**Responses**

**Comment 3-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

3-1

**Commenter 3 – Linda Jensen**

3-2

1                   The third factor -- not only the park  
2                   space and the fact that it's an area of economic  
3                   development, the third factor and the most important  
4                   for me is that the Greenway serves as a safety  
5                   facility. And what I mean by that is I had -- when  
6                   I moved here, I had a daughter in high school who  
7                   was attending South High, which is on 31st Street  
8                   just south of the Greenway. And for many kids that  
9                   go to that high school, the Greenway is their form  
10                  of transportation. There's -- under the safety or  
11                  health section I don't see reference to the fact  
12                  that South High is there. It has a substantial  
13                  student body. There's no public -- schools don't  
14                  provide transportation within a two-mile radius, so  
15                  those kids have to get there on their own volition.  
16                  I was pleased to see that my daughter has  
17                  made good environmental choices. She chooses to  
18                  bike to get back and forth to go to school, to  
19                  commute across town. The Greenway is an important  
20                  path that runs the entire width of South  
21                  Minneapolis. It intersects with major south bike  
22                  paths. It intersects with a train station. It's a  
23                  very viable transportation option for people who  
24                  choose not to drive.  
25                  From my perspective as a parent, it's a

**Responses**

**Comment 3-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 3 – Linda Jensen**

**Responses**

1 safety issue. There's no trucks, there's no buses,  
2 there's no cars like there are on Lake Street and  
3 28th and 26th. It's the only -- when my daughter  
4 left in the morning riding a bike, I felt that she  
5 was safe when she was riding the Greenway. And for  
6 me that was a factor in choosing to move here is  
7 that I knew that commuter option was available for  
8 her.

3-3

9 And, again, like I said, I didn't see  
10 anything in the EIS -- and I think health and safety  
11 was covered in Section 5.6 -- the fact that that  
12 school is there, and that so many of the children  
13 rely on that and the families as a form of  
14 transportation I think should be addressed.

3-4

15 So, to summarize, I think it would be  
16 extremely shortsighted to take this -- what's a  
17 jewel of South Minneapolis and turn it into a site  
18 for overhead lines for both the destruction of the  
19 aesthetics of the park space, for the damage to the  
20 economic development that's occurring along it, and  
21 because of its role as safe transportation  
22 alternatives. I urge that the overhead option along  
23 the Greenway route be rejected; that the Commission,  
24 at minimum, look at undergrounding options in order  
25 to address some of those concerns; and, finally, on

**Comment 3-3**

Text in Section 5.1.2.1 of the EIS has been modified to note the location of South High South.

**Comment 3-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 3 – Linda Jensen; Commenter 4 - Joseph Spangler**

**Responses**

**3-4**

27

1 the cost issues, because this isn't a distribution  
2 plant, it's a transmission line, that the cost be  
3 spread across the entire area of the grid that uses  
4 that resource.

5 Thank you.

6 MR. STORM: Thank you, Linda.  
7 Joseph Spangler.

8 MR. SPANGLER: Thank you. I'll try not  
9 to use the Teleprompter or check my (inaudible).  
10 (Inaudible.)

11 My name is Joseph Spangler,  
12 S-P-A-N-G-L-E-R.

13 COURT REPORTER: I didn't catch your  
14 first comments.

15 MR. SPANGLER: I'll be happy to turn my  
16 comments in in writing. It seems a little strange  
17 to be talking to a dictation rather than a group up  
18 here that will be making decisions on this. But  
19 that's just an off-the-cuff comment.

20 Madam, what didn't you get?

21 COURT REPORTER: What they were clapping  
22 about when you were turned around.

23 MR. SPANGLER: There was an appreciation  
24 from the audience about my comments about the  
25 elected officials, both city and county.

**Commenter 4 – Joseph Spangler**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Bill --

MR. STORM: Face the court reporter.

COURT REPORTER: Why don't you come just stand by me? And that way I can hear you and you can look at them.

MR. SPANGLER: Bill, what I found in your report that did not thrill me, satisfy my concerns, and that I have a direct involvement in are, one, the effects on the historic sites; Chicago, Milwaukee, and St. Paul historic district; Pioneer Cemetery, Sears building, and the Dayton Rogers building on 13.

I do my family genealogy and discuss our area with a number of people who have come here to see the sites. They stay at the hotels and our restaurants. This would have a negative effect on that positive aspect of our life.

Two, noise. Currently I hear a buzz or a high ring from the current lines, the higher voltage lines at the top of the alley poles. Mostly intermittent, but in the cold some days very frequent. It is now an annoyance but getting stronger, and I would not be able to live here any longer. That's after 51 years in the same home. For those of you who are here, maybe -- it's a house

**Responses**

**Comment 4-1**

A discussion of historical properties in the Project Area appears in Section 5.3 of the EIS.

**Comment 4-2**

A discussion of noise emitted from high voltage transmission lines appears in Section 5.14.1.2 of the EIS.

**Commenter 4 – Joseph Spangler; Commenter 5 – Jim Howitt**

**Responses**

4-3

1 with redwood siding and a country flag flying out in  
2 front of 15th. I'm a proud member of the Phillips  
3 community.

4 Three -- three, a bill to give Xcel to  
5 maintain a dangerous overhead line. A number of us  
6 have been trying for four years to get Xcel to  
7 repair a blinking floodlight in this very parking  
8 lot that they are responsible for, and they are not  
9 capable of even doing that.

10 Thanks.

11 MR. STORM: Jim Howitt.

12 MR. HOWITT: My name is Jim Howitt.

13 J-I-M. H-O-W-I-T-T. I use the Greenway on a daily  
14 basis nine months a year bicycling. I'm also a  
15 member of the Sioux Line Community Garden, which is  
16 along the Greenway but further west than this  
17 project is intended to go.

5-1

18 My comments are primarily in regard to  
19 option A, the routing of the lines along the  
20 Greenway. The draft EIS does not adequately address  
21 the impacts of constructing these lines along the  
22 Midtown Greenway. The Greenway is not like other  
23 parks of the city. It's a unique trail, and the EIS  
24 does not give enough weight to the fact that  
25 disturbances to it will be to a great community

**Comment 4-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 5-1**

A discussion of potential impacts from the construction of the Project along or within the Midtown Greenway appears in Sections 5.2, 5.3, 5.4, 5.5, 5.7, 5.8, 5.10, and 5.16 of the EIS.

**Commenter 5 – Jim Howitt**

1 asset that's rare to the city.  
2 Construction along the trail will lead to  
3 restrictions or closure of the Greenway. Unlike  
4 automobile traffic, bicyclists do not have similar  
5 nearby alternatives. Past construction detours have  
6 not been adequate in terms of safety and  
7 convenience.  
8 Further, the presence of vehicles from  
9 one construction project after another is against  
10 the spirit and purpose of the trail, and the EIS  
11 should address this more thoroughly.  
12 Preservation of the plantings along the  
13 Greenway was given no attention in the EIS. Much of  
14 the green space along the Greenway has been -- has  
15 required hours of volunteered labor and years of  
16 developing the grade soil. Replacement of plantings  
17 that have been dug up is not the same as  
18 preservations of established plantings.  
19 The visual impact of the lines and the  
20 substations is unacceptable in the Greenway  
21 corridor. The Greenway's a combination of  
22 low-impact development and a linear park. Xcel  
23 should not be allowed to reindustrialize this area  
24 simply because it's the least-expensive solution for  
25 them.

**Responses**

**Comment 5-2**

A discussion of potential impacts to bicyclists appears in Section 5.16.2.1 of the EIS.

**Comment 5-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 5-4**

A discussion of the existing plantings within the Midtown Greenway appears in Section 5.10.2.1 of the EIS.

**Comment 5-5**

Thank you for your comment. It has been noted and included in the record for this EIS.

5-2

5-3

5-4

5-5

**Commenter 5 – Jim Howitt**

**Responses**

5-6

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

The EIS needs to address the community-wide negative impact that their lines will have on the aesthetic character of the area and the fact that the impacts are felt to a greater degree in this spot than they would be in other areas of the city. A look at the towers and proposed 12-foot-high walls and fences are completely out of character with the other -- with the rest of the Greenway corridor.

5-7

Likewise, the industrial character of the noise, the construction and operation of the lines and substations will have an outsized impact on the Greenway users that would not be felt this strongly in other parts of the city. The EIS does not acknowledge this, but it should.

5-8

The impact on wildlife has not been adequately considered either. While it's no wildlife sanctuary, the Greenway does provide habitat for several species that are not present in most parts of the city. I've had many bird sightings there, including hawks, that I haven't seen anywhere else in Minneapolis except along the Cedar Lake Trail. The power lines, which the draft EIS admits will have a negative impact on wildlife, should not be placed in this relatively rich, by

**Comment 5-6**

A discussion of the potential impact from the Project on the aesthetic character of the Project Area appears in Section 5.8.2 of the EIS.

**Comment 5-7**

A discussion of the potential impacts from the Project on noise along each of the route alternatives appears in Section 5.14.2.1 of the EIS.

**Comment 5-8**

A discussion of the potential impacts from the Project on wildlife appears in Sections 5.11 and 5.12 of the EIS.

**Commenter 5 – Jim Howitt;  
Commenter 6 – Mehmet Komar-Stenberg**

1 city standards, wildlife area.  
2 In addition to the noise and visual  
3 impacts, Xcel desires to use the existing and  
4 proposed green space for its substations. The value  
5 of the Greenway is not just as a transportation  
6 corridor, but lies in the existence of these green  
7 spaces. Xcel has not done enough in its EIS to  
8 discuss the negative impacts of removing green space  
9 from public enjoyment.  
10 In summary, the EIS has done virtually  
11 nothing to address the fact that Xcel is proposing  
12 to degrade a unique public resource. The impacts of  
13 their proposal are grave here because there's only  
14 one Midtown Greenway. The EIS should recognize that  
15 Xcel's plan represents the destruction of the vision  
16 of the city, county, and thousands of trail users  
17 for this area.  
18 Thank you.  
19 MR. STORM: Mehmet Komar-Stenberg.  
20 MR. KOMAR-STENBERG: You're going to want  
21 me to spell that, I'm guessing. My name is Mehmet  
22 Komar-Stenberg. M-E-H-M-E-T. Last name  
23 is K-O-M-A-R, hyphen, S-T-E-N-B-E-R-G.  
24 All right. Very briefly. First of all,  
25 I want to actually say something positive about the

**Responses**

**Comment 5-9**

Text in Sections 5.2.1.3 and 5.2.2.2 has been supplemented to include information on the MnDOT Community Roadside Landscaping Program and tree plantings at the Hiawatha Substation locations. Potential impacts to the green space located at the Hiawatha West Substation site are discussed in appropriate sections of the EIS.

**Comment 5-10**

Thank you for your comment. It has been noted and included in the record for this EIS.

5-9

5-10

**Commenter 6 – Mehmet Komar-Stenberg**

1 draft EIS from my perspective. As I looked through  
2 the description of the potential impacts and the  
3 description of alternatives, it seems to me that in  
4 almost every case there's a recognition that putting  
5 a line below ground rather than above ground is the  
6 way to go. So I want to recognize that.

7 And then very briefly, just a couple of  
8 concerns. In the description of the regulatory  
9 framework for the EIS, I don't see any mention of  
10 the Minnesota Environmental Rights Act or the  
11 provisions in the Minnesota Environmental Policy Act  
12 which talks about pollution, impairment, and  
13 destruction of the environment and the fact that  
14 that kind of thing can't happen in this state so  
15 long as there's a feasible prudent alternative. I  
16 think this draft EIS identifies a few alternatives,  
17 namely putting the line underground.

18 And then, finally, with respect to  
19 electromagnetic fields, in the section of the draft  
20 EIS it discusses concerns about EMF. It seems like  
21 most of the research that that section is based on  
22 is ten years old. There are some references to much  
23 more current materials as well. But I guess one of  
24 the questions I have is most of the stuff that's  
25 cited in there talks about the fact that there's no

**Responses**

**Comment 6-1**

The EIS was prepared in accordance with the Minnesota Power Plant Siting Act (Minnesota Statutes Chapter 216E), which satisfies environmental review under the Minnesota Environmental Rights Act and Minnesota Environmental Policy Act.

**Comment 6-2**

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS. Publications from the USEPA and World Health Organization, dated 2009, were relied upon for the discussion of EMF in the EIS.

6-1

6-2

**Commenter 6 – Mehmet Komar-Stenberg;  
Commenter 7 – Angelina Matias-Vasquez**

**Responses**

6-2

34

1 consensus yet about whether EMFs are risks or not,  
2 and I'm wondering whether the EIS shouldn't speak  
3 from a cautionary principal, that what we know  
4 don't --

5 (Clapping.)

6 MR. KOMAR-STENBERG: -- that when we're  
7 not sure of the impact, that there's some indication  
8 that there may be an impact, that we err on the side  
9 of caution.

10 So those are my comments. And I want to  
11 thank you, Bill, for having to stand up at the  
12 podium all night.

13 Thank you.

14 MR. STORM: Angelina Matias-Vasquez.

15 MS. MATIAS-VASQUEZ: Good afternoon,  
16 everyone. Thank you for coming. I have only three  
17 points to make.

18 COURT REPORTER: Could you spell your  
19 name?

20 MS. MATIAS-VASQUEZ: A-N-G-E-L-I-N-A.  
21 M-A-T-I-A-S, hyphen, V, as in Victor, A-Z, as in  
22 zebra, Q-U-E-Z, as in zebra.

23 I work for the Women's Environmental  
24 Institute and also sit on the board of the Greenway,  
25 and I also happen to be on the Commission for Health

**Commenter 7 – Angelina Matias-Vasquez**

7-1

1 for the Culture Women's Center Backyard Initiative.

2 And I said three points. The first point  
3 is that the community has a very important role to  
4 play, and I invite everyone to be a part of this  
5 process.

7-2

6 And my second point, which I think is  
7 also just as important as the community  
8 participation, is the fact that I would like to have  
9 the City of Minneapolis, and that is our city  
10 officials, play -- facilitate a role between Xcel  
11 and Midtown Community Works, which is an  
12 organization that's already in existence in our  
13 community and that I think that the community,  
14 together with the city and Xcel and Midtown  
15 Community Works, could come up with a very important  
16 alternative plan to this Xcel Hiawatha project.  
17 That would call for more renewable energy, energy  
18 efficiency, what is called distributed --  
19 distributed generation and demand management, saver  
20 switches, and demand response. And I will explain  
21 what that means.

22 It simply means that we could take solar  
23 energy and other renewables put together as a  
24 package, and we would all have the opportunity to  
25 become energy producers. And that would provide

**Responses**

**Comment 7-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 7-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 7 – Angelina Matias-Vasquez;  
Commenter 8 – Scott Cramer**

1 green jobs for our community. And that is a  
2 sustainable alternative to what we have now, coal.  
3 And also it's something that can be a long-lasting,  
4 sustainable alternative to this proposal that we  
5 have in front of us.

6 So then we will need the community to  
7 work together with our city officials and these  
8 other groups that I mentioned to come up with these  
9 alternative energy plans for our community. And I  
10 think that we can do it.

11 So my last point is that I would like  
12 to -- I would like to know how many people from my  
13 community here, my neighbors -- I live and work in  
14 this community, so I want to know how many of you  
15 are willing to start to work on this alternative  
16 project today, tomorrow?

17 UNKNOWN SPEAKER: Here, here.

18 MR. STORM: Thank you.

19 Scott Cramer. State and spell your name.

20 MR. CRAMER: Scott, S-C-O-T-T. Cramer,  
21 C-R-A-M-E-R. I come to you as a long-term resident.  
22 I am cochair of the Longfellow Business Association.  
23 I'm on the Longfellow Community Council. And I will  
24 be affected by what is done here in this next year.

25 I can tell you as from the business

**Responses**

**Comment 7-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

7-3

**Commenter 8 – Scott Cramer**

8-1

1 perspective, we need more electrical power. We  
2 suffer from brownouts and blackouts every summer.  
3 This costs us thousands of dollars. There are  
4 businesses that I represent in the Business  
5 Association that lose money every year because of  
6 this.

7 Having said that, I can also tell you  
8 that personally I am not going to use kilowatts  
9 of -- on the road to my building.

8-2

10 So I have more questions than I have  
11 anything else here. Some of them are for Xcel.  
12 When Lake Street was torn up, which was known for  
13 years in planning they were going to tear it up and  
14 reconstruct it, why wasn't the infrastructure put in  
15 place and this line to be put in Lake Street?

16 As we know from our history on energy  
17 issues, if something is done badly, people will rise  
18 in resistance against it. My first arrest in total  
19 disobedience was a farm in West Central Minnesota on  
20 power line back in 1978. We have had millions of  
21 dollars spent in resistance and the surveillance,  
22 struggles of resistance to the destruction of  
23 Minnehaha Park and the oak trees and the surrounding  
24 area, things that could have been avoided if done  
25 differently. But it would seem that the costs were

**Responses**

**Comment 8-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 8-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 8 – Scott Cramer

38

1 too high to do them differently, and so through  
2 corporate and governmental agreement down the  
3 torpedos full speed ahead and development projects  
4 occurred and met mass resistance.

5 Now, I have no knowledge that that's  
6 what's going to happen with this. I don't. I'm not  
7 involved with that. But I can tell you if you're  
8 going to put a high voltage line and a substation in  
9 an area that we've been fighting for years to  
10 develop into something usable after the  
11 industrialization of America continues and is  
12 continuing, this will be met with resistance.

13 But I can tell you as well we need more  
14 energy in this area. And it reminds me of when I  
15 get the bill from Xcel -- used to be Northern States  
16 Power -- they were forced into renewables. They  
17 wanted to add more storage at Prairie Island for the  
18 high reactor waste that has no home and never will  
19 apparently. And it was only through the agreement  
20 to increase the storage there that they put \$400,000  
21 initially into renewables. And now they've become  
22 very adept and good at developing renewables. So  
23 the planet is facing -- apparently facing global  
24 warming and will continue to. And through the  
25 burning of fossil fuels like coal and through

## Responses

**Commenter – 8 Scott Cramer; Commenter 9 – Eric Hart**

**Responses**

8-3

1 nuclear power, which has no home for its long-term  
2 waste, why are we not considering our local  
3 development renewables and a massive program of  
4 renewables? I know this is outside the scope of  
5 this decision, because the decisions are  
6 compartmentalized. This is just one small decision.  
7 Put the line underground. Put the substation on the  
8 G-4 site south of Lake Street, not out on the  
9 Greenway.

8-4

10 Thank you.  
11 MR. STORM: Eric Hart.  
12 MR. HART: Eric Hart. E-R-I-C. H-A-R-T.  
13 I'm in the Longfellow neighborhood. I'm with the  
14 Environmental Transportation Committee, and I'm the  
15 representative of the Midtown Greenway Coalition.

9-1

16 I want to speak to the Hiawatha  
17 substation. In the scoping document they had five  
18 alternatives that were supposed to be for the EIS.  
19 They were not explored. They just took those and  
20 said they wouldn't work. Now since this EIS has  
21 been released, there has been information submitted,  
22 and Xcel has responded with detailed information on  
23 all five of these alternatives. So those should be  
24 included in the final EIS. That is new information  
25 and has -- there are some viable alternatives there

**Comment 8-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 8-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 9-1**

Text in Sections 1.5 and 7.2 has been modified and supplemented to include information on the feasibility of substation construction at the locations proposed by the ATF.

**Commenter 9 – Eric Hart ; Commenter 10 – Josh Tolkan**

**Responses**

**Comment 10-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

40

1 that the EIS didn't address at all.

2 Then I also want to second what Dave

3 Peterson said about the green space that the --

4 where the substation's proposed to be. We've been

5 working on that for over ten years now, and

6 that's -- it's a huge thing that needs to be

7 included. And also the Midtown Greenway in -- along

8 east of Hiawatha is quite well-known as green space

9 on all the maps.

10 That's all my comments.

11 MR. STORM: Josh Tolkan. Please state

12 and spell.

13 MR. TOLKAN: Josh Tolkan. J-O-S-H. Last

14 name T-O-L-K-A-N. I'm glad to be going after Eric.

15 I want to first echo what he said, that the Greenway

16 is a well-established green space. And I know

17 it's -- I was going to say, until I was reminded of

18 the Camp Cobark tragedy, that if the Greenway was

19 formally considered a park, I think it's commonly

20 considered a motel in South Minneapolis, that this

21 might never be an issue. But, you know, I guess the

22 power company is more powerful than I could imagine.

23 I also want to say with regard to the

24 distributed generation that power companies like

25 Xcel are going to be forced to revolutionize their

10-1

**Commenter 10 – Josh Tolkan**

**Responses**

10-1

1 role in the power industry, because I think  
2 distributed power is really the way of the future.  
3 And there is an important role for managing the  
4 grid. That's something that a power company needs  
5 to learn how to do. That's their role, to manage  
6 the power grid and not be the ones who are  
7 monopolizing the actual production.

10-2

8 My most important point I think is  
9 that -- it's not necessarily addressed -- is the  
10 Greenway is a park and it's a historic park that has  
11 been created as the area has been deindustrialized.  
12 The historic buildings and bridges constitute a  
13 historic area that will be substantially altered by  
14 the installation of those lines. And the experience  
15 with that space is the -- the experience that has  
16 created in the space, we will probably -- on those  
17 bridges and through that historic building, there's  
18 something that you really can't put into words,  
19 can't emphasize enough, in my opinion, in a  
20 document, EIS, the effect that's going to have on  
21 people's perception of the space.

10-3

22 And I think that that will not only just  
23 have -- affect people's enjoyment of the historic  
24 park, the Greenway, but it will also affect people's  
25 potential -- sort of criminal's perception of the

41

**Comment 10-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 10-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 10 – Josh Tolkan**

**Responses**

10-3

1 space and may increase the level of crime. And one  
2 thing I'd really like to see is a study of how crime  
3 levels across the country have been affected when  
4 power lines have been installed in a neighborhood  
5 and how that affects people's perception of an area.  
6 And I believe that it may -- may need to increase  
7 levels of petty theft, robbery, and other things.

10-4

8 I also want to say -- no one has  
9 mentioned tonight the effects on the environmental  
10 justice effects. The development along Lake Street  
11 that will be affected by putting these power lines  
12 is something that the Midtown Greenway Coalition --  
13 developers have stated that they will be less  
14 inclined to build more housing and more commercial  
15 areas along Lake Street if there are high voltage  
16 power lines just to the north of that commercial  
17 corridor. And I think it's real environmental  
18 traf -- environmental equality to put the high  
19 voltage power lines through an area of town that has  
20 a lot of minority business owners when just down the  
21 street at Lake Street -- west of Lake Street in  
22 Uptown there's a tremendous amount of economic  
23 development. And the people, both the immigrant  
24 community business owners who are in the Midtown  
25 part of Lake Street, should be trying to benefit and

**Comment 10-4**

A discussion of the potential impact of the Project on commercial and residential development appears in Sections 5.2.2.1 and 5.4.2.2 of the EIS.

**Commenter 10 – Josh Tolkan;  
Commenter 11 – Hillary Oppmann**

10-5

43

1           they should, you know, be developing synergy with  
2           the businesses in the Uptown area. And building  
3           this power line, I think, is not very -- not  
4           allowing them to capture the synergetic relationship  
5           they have to Uptown.

6                     And, finally, I just wanted to mention  
7           burying line, which I know has been addressed well  
8           in the EIS, but I think that there's more -- I'm  
9           echoing what people said before, there's more  
10          information coming out by various groups, including  
11          the Uptown Greenway Coalition that I'm involved with  
12          is researching, and I don't think that burying lines  
13          directly below an area where pedestrians and  
14          bicyclists are going to be walking or biking on a  
15          daily basis is an acceptable risk for the State of  
16          Minnesota to be taking on, whether that's on a  
17          sidewalk next to 28th Street or underneath the  
18          walking path that is the Greenway.

19                    So thank you so much for your time.

20                    MR. STORM: Hillary Oppmann. Please  
21                    state and spell.

22                    MS. OPPMANN: Hillary Oppmann.  
23                    H-I-L-L-A-R-Y. O-P-P-M-A-N-N. I live in the  
24                    Longfellow neighborhood just two blocks south of the  
25                    Greenway where I've lived for almost ten years now.

**Responses**

**Comment 10-5**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 11 – Hillary Oppmann**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

44

And I use the Greenway almost daily year round biking and walking and often taking my kids with me. And I've been active both as a volunteer but also as staff with the Longfellow Community Council. I'm currently a volunteer working on the Greenway and native landscaping issues. But I can speak to comments made by some of the previous speakers that the site of the substation, the substation west, would impact the green space that has been recognized for over ten years as an important part of future green space in the neighborhood, in a neighborhood that doesn't have many options for large tracts of green space.

And I fully agree that there needs to be more analysis about the impacts of a substation on that site, especially I think for the impacts on the users, the biker and pedestrian users, and the folks who are riding the light rail. It seems like the views that were shown mostly were from the perspective of those in cars. And I think that the Midtown Greenway being what it is, greater emphasis needs to be made on looking at the impacts of all these nonmotorized users of the space.

It's also significant that the site, the green space and the substation site, are adjacent or

**Responses**

**Comment 11-1**

Text in Sections 5.2.1.3 and 5.2.2.2 has been supplemented to include information on the MnDOT Community Roadside Landscaping Program and tree plantings at the Hiawatha Substation locations. Potential impacts to the green space located at the Hiawatha West Substation site are discussed in appropriate sections of the EIS.

11-1

**Commenter 11 – Hillary Oppmann**

1 right where there's a significant intersection of  
2 trails, the Midtown Greenway and the light rail,  
3 biking-pedestrian trails meet. And in the planning  
4 and talks that have happened around the site over  
5 many, many years, one of the things we recognize is  
6 that there's potential and synergy there for  
7 wayfaring signs, signage that educates people about  
8 some of the historic properties of the site. That  
9 site is where there was a massive train round house  
10 there and all of the trains, you know, used to come  
11 through there; putting up a historic marker of some  
12 kind about that or having some sort of a gathering  
13 spot for people as they come into that space. And  
14 the initial planning has always focused and the  
15 implementation on the green space and getting the  
16 trees and the shrubs in the ground. And obviously  
17 plopping a substation down in the middle of that has  
18 a huge impact on the future of the site for green  
19 space but also for these other uses of the site down  
20 the road.

21 As others have mentioned, I was glad to  
22 see that the EIS does look seriously at putting  
23 lines underground. And I'd like to see, I guess,  
24 more analysis of the underground option for the  
25 substation. I guess first I would like to see the

**Responses**

**Comment 11-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 11-3**

A study on the design and cost of undergrounding the Hiawatha West Substation is included in Appendix D of the EIS. Potential impacts from an underground substation and the potential for an underground substation to mitigate impacts from an aboveground substation design is discussed in appropriate subsections of Section 5.0 of the EIS.

11-2

11-3

**Commenter 11 – Hillary Oppmann;  
Commenter 12 – Joshua Houdek**

11-3

1 additional analysis of alternative sites that are  
2 away from the green space and more serious pursuit  
3 by Xcel of alternatives. And if those alternatives  
4 are still deemed that they don't meet their needs,  
5 that they seriously consider burying the substation,  
6 although it would still not -- there would be  
7 problems with limitations on what could be done with  
8 the green space on top of a buried substation, and  
9 that should be explored more as well.

11-4

10 The site -- the future expansion impacts  
11 again were not fully considered, and that needs to  
12 be addressed in the final EIS.

13 That's all of my comments. Thank you.

14 MR. STORM: Michael Knack.

15 MR. KNACK: I'll send my comments online.

16 MR. STORM: Joshua Houdek.

17 MR. HOUDEK: Close. Okay. Joshua,

18 J-0-S-H-U-A, Houdek, H-0-U-D-E-K. I live in  
19 Longfellow. I'm heavily involved in my Longfellow  
20 neighborhood block, many members of which are here  
21 tonight. I'll open up with two comments. I know  
22 they're not within the scope of tonight's meeting,  
23 but I need you to just hear me out.

24 I'm a strong supporter of renewable  
25 energy development if we're going to be investing --

**Responses**

**Comment 11-4**

The Applicant submitted an Application for a Route Permit to the Public Utilities Commission to construct two new distribution substations and two 115 kV transmission lines. The proposed Project does not include future expansion of the transmission lines or substations. OES does not consider the Project to represent a connected action with any current or future project because the proposed Project is a stand-alone project and is neither brought about by another project nor interdependent with another project.

**Commenter 12 – Joshua Houdek**

12-1

1 Xcel is going to be investing upwards of \$12 million  
2 plus to bury lines. I think if we looked at putting  
3 that into renewable energy solutions as well as  
4 conservation solutions, we might not need this  
5 project.

12-2

6 Secondly, if after a more thorough  
7 analysis is done with that and we still need this  
8 project, I'm a strong supporter of burying the lines  
9 and these substations.

12-3

10 But back to the scope of this project.  
11 First off, I think the draft environmental impact  
12 statement does need to address much more intensively  
13 the economic impact of the power lines in current  
14 and future backyards. This will force property  
15 values down; and, consequently, property tax revenue  
16 that is so critically needed to fund our public  
17 services will go down. I don't think that the DEIS  
18 has adequately looked into all that.

12-4

19 Secondly, I am active in a group called  
20 Remove. And that is removing graffiti in the  
21 Longfellow area. If these lines are put in  
22 overhead, the poles will be graffiti magnets. And I  
23 don't think that was -- I didn't see that in the  
24 DEIS. Graffiti is not just an aesthetic problem.  
25 If you talk to the Minneapolis Police Department,

**Responses**

**Comment 12-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 12-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 12-3**

A discussion of the potential impacts of the Project on property values appears in Section 5.4.1.2 of the EIS.

**Comment 12-4**

Text in Sections 5.6.1.8, 5.6.2.8, and 5.6.3.8 has been modified and supplemented to include information on the potential effects and mitigation of graffiti.

**Commenter 12 – Joshua Houdek;  
Commenter 13 – Amy Blumenshine**

**Responses**

12-4

1 there are other implications surrounding graffiti  
2 besides livability issues. Of course, as we know,  
3 some graffiti is attached to gang activity. So I  
4 feel that that should be more fully evaluated.  
5 Perhaps the Minneapolis Police Department can be  
6 consulted.

12-5

7 Lastly, the city's transportation plan  
8 includes a very serious look at a streetcar corridor  
9 in the Greenway area. I'm curious as to the impacts  
10 of the line on that plan that has been passed.

11 And those are my comments. Thank you.

12 MR. STORM: Amy Blumenshine.

13 MS. BLUMENSHINE: I am Amy Blumenshine.

14 That's A-M-Y. B-L-U-M-E-N-S-H-I-N-E. And I want to  
15 underscore what a number of other people have said  
16 tonight.

13-1

17 I want to begin by expressing my  
18 appreciation also for the public officials who are  
19 here tonight as well as so many of the people who  
20 turned out giving their time and affirmation to the  
21 importance of the Greenway in our lives. I think  
22 that's really significant testimony. And, indeed,  
23 the Greenway represents a 21st Century asset, a new  
24 way of being in the city, of promoting  
25 transportation by your own capacity and also

**Comment 12-5**

A discussion of the potential impacts of the Project on a streetcar corridor within the Midtown Greenway appears in Section 5.16.2.1.

**Comment 13-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 13 – Amy Blumenshine**

**Responses**

13-1

1 recreation and health promotion as public policy.  
2 These are trends that the EIS did not deal with.  
3 I'm being critical of it, what I'll call a 20th  
4 Century perspective on what matters and what's  
5 important here.

13-2

6 The Greenway is a pilot in a way  
7 nationally being watched to look to see what happens  
8 when we have this really unique urban and  
9 highly-used bicycle corridor. And, unfortunately,  
10 putting overhead lines there will -- will have a  
11 negative impact. And I don't believe that the EIS  
12 fully appreciates, again, some of the weak language  
13 about perceptions, et cetera. Well, people buy  
14 according to their perception. People develop  
15 according to their perceptions. Instead of showing  
16 how bicycle trails of the Greenway sort can actually  
17 promote economic development in challenged  
18 neighborhoods, we suspect that making it  
19 aesthetically unpleasing and whether we get  
20 demonstrated for sure the health impact or not, it  
21 is indeed definitely in people's minds that they  
22 have health impacts from this. And so people will  
23 choose not to be around these high power lines.

13-3

24 There's an issue of whether insurance is  
25 going to be available for people who develop or even

**Comment 13-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 13-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 13 – Amy Blumenshine;  
Commenter 14 – Aaron Keith**

13-3

1 health insurance for pregnant women and their  
2 offspring. And, again, we have to have a long-term  
3 perspective on this. What you're talking about  
4 doing is likely to be there for a long time, so we  
5 have to look into the future in terms of what our  
6 needs will be.

13-4

7 So I also echo what others have said in  
8 terms of their -- we have a gem of a park here that  
9 has made 21st Century transportation and recreation  
10 accessible to people who -- many of whom live with  
11 challenged circumstances. And the EIS does not  
12 sufficiently address the negative impact of putting  
13 overhead lines in such a tranquil special park  
14 space.

15 And I also wish to go beyond the scope of  
16 the EIS to talk about our need to develop  
17 transportation and energy use models that do not  
18 contribute greenhouse gases because, again, that is  
19 important. We think our Public Utility Commission  
20 should be concerned about that as well.

21 Thank you.

22 MR. STORM: Aaron Keith.

23 MR. KEITH: Thank you for the opportunity  
24 to speak at this wonderful public meeting.

25 MR. STORM: State and spell.

50

**Responses**

**Comment 13-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 14 – Aaron Keith**

1 MR. KEITH: Aaron, A-A-R-O-N. Last name  
2 Keith, K-E-I-T-H. Take a moment to just -- what a  
3 privilege it is to live in a country where we get to  
4 do this.

5 I'm union. I'm a sound engineer. I've  
6 been pulling wire for over 30 years. Electricity is  
7 a wonderful thing. We use it everyday. We'll  
8 probably use it again. If you're going to pull  
9 wire, put it underground. It's the only way to do  
10 it.

11 For 25 years on my weekends, my evenings,  
12 my slow month I take every nickel I have and I fix  
13 up buildings. I turned around affordable housing  
14 that was condemned. I'm closing on a house at the  
15 end of this month in the Central neighborhood, and  
16 most all that property would be in eyesight of an  
17 overhead high voltage power line. And I think as a  
18 stakeholder in a real estate value of the area, an  
19 overhead power line is absolutely a downer. I mean,  
20 it's not going to help anything.

21 And to our public official, Commissioner  
22 McLaughlin, we appreciate you being here this  
23 evening. I've watched you on cable as you  
24 delicately balance the budget. And I think this is  
25 a balancing act between the individual property

**Responses**

**Comment 14-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 14-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

14-1

14-2

**Commenter 14 – Aaron Keith**

14-3

52

1 owners in this area and Xcel. Do we have a right to  
2 have property that goes up in value and the state  
3 have a right to have its tax, you know, levies go up  
4 so that it can run the programs that it wants to,  
5 everything from health care to education to the kind  
6 of things we want to do with our money, or are we  
7 going to trade it with Xcel so they can -- you know,  
8 multinational stock corporation, take the money to  
9 wherever they want and do whatever they want with no  
10 compass whatsoever? It's a simple balance of our  
11 equity versus their equity. If they're going to  
12 come here and run the line, put it underground.

13           Going back to the Greenway, you know,  
14 Central Park in New York City, Golden Gate Park in  
15 San Francisco, the lakes, the wonderful parks that  
16 we have in this city, and you'll notice that every  
17 property along all of that parkway just the values  
18 go through the roof. The tax levy goes through the  
19 roof. The quality of life that is there really goes  
20 through the roof. And this little strip of Greenway  
21 that we have is just the beginning. We've had every  
22 opportunity, we should widen it, we should enhance  
23 it, wading pools, basketball courts, flower gardens,  
24 everything. If you put a high voltage power line  
25 over the top of it, you know, nobody wants to be

**Responses**

**Comment 14-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 14 – Aaron Keith

53

1 under it. It's really that simple.  
2 But I really appreciate the time. Again,  
3 this is a fast one. I've been here 25 years. I  
4 heard about this two days ago. You know, but here I  
5 am. The last time I was at a Public Utility  
6 Commission hearing three years ago concerning Xcel,  
7 a friend of mine who I work with her furnace off for  
8 two years and she was burning wood, and her gas bill  
9 stayed the same, \$2,500, 5- or \$6,000. I had some  
10 contract experience. I started writing letters,  
11 making phone calls. We got nowhere with Xcel. We  
12 ended up having to go to the Public Utility  
13 Commission and give testimony to get the bill fixed.  
14 And what I learned is that Xcel is discouraging  
15 conservation. If you put a solar panel on your roof  
16 like every single one of us should, they're going to  
17 charge you for the electricity that you give back to  
18 them. They want to tax you. The less you use the  
19 more they want to charge you for what you do use.  
20 If you become your own producer, they want to tax  
21 you for being an energy producer. This is shocking.  
22 And I only heard it this year, and I'm positive it's  
23 not in the 3,000 pages over here. But every single  
24 one of us on fossil fuel is generating many times  
25 our body weight every year in carbon dioxide going

## Responses

**Commenter 14 – Aaron Keith**

1 into the air. And this is not a sustainable plan.  
2 We can no longer -- you know, for the first 50  
3 layers, the coal is being compressed into the  
4 ground. The people that came along thought the  
5 planet was flat. Up until a couple hundred years  
6 ago, everybody thought the planet was flat. Now  
7 we're burning coal at alarming rates, and we keep on  
8 saying that we can do this forever. And I could be  
9 wrong -- please stop me if I'm wrong -- but science  
10 probably said we have to stop this in our lifetime.  
11 We cannot continue to do this. And a company that  
12 comes in here to say we just want to keep on doing  
13 the same old same old the same way, I say no. I say  
14 no.

15 So, number one, if they are going to come  
16 in, they should be coming in with a sustainable  
17 plan, cover every roof in Central, Phillips,  
18 Longfellow with solar panels. We'll use the money  
19 down there and share it amongst ourselves. But we  
20 do not need a company coming in here with the idea  
21 that we're going to be breathing CO2 for the rest of  
22 our lives. It cannot be done.

23 Let's see. So my final comment to the  
24 PUC is that they should -- I'm going to say this for  
25 every project Xcel has. It's immoral that any

**Responses**

**Comment 14-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

14-4

## Commenter 14 – Aaron Keith

55

1 business would come to anybody on the planet and say  
2 let me burn fossil fuel instead of putting in a  
3 solar panel; I'm going to tax you for trying to  
4 clean the air; I'm going to tax you for trying to  
5 make your own life richer; I'm going to tax you for  
6 thinking of something we haven't thought of. You  
7 know, they do not have a place for their nuclear  
8 waste. They do not have a way to take the CO2 out  
9 of the air and put it back in the ground, but they  
10 want to tax this gentleman over here who's got 8.6  
11 kilowatts on his roof and he makes enough to put it  
12 back into the meter into the grid, they want to tax  
13 him for it. That's ridiculous. I would say to the  
14 PUC or anybody in here, none of these permits should  
15 even be considered until Xcel gets rid of its  
16 anticonservation approaches, its tariffs and risks  
17 and taxes and tariff on renewable energy.

18 Thank you very much.

19 MR. STORM: Okay. How about we give the  
20 court reporter a break for five minutes? So let's  
21 break for five, ten minutes. I'll call you back.

22 (Break.)

23 MR. STORM: Okay. I'd like to resume. I  
24 appreciate you allowing the court reporter to take a  
25 break. This is as tough on her as it is on me.

## Responses

### Comment 14-5

Thank you for your comment. It has been noted and included in the record for this EIS.

14-5

## Commenter 15 – Ralph Jacobson

## Responses

56

1 I want to remind you before I start with  
2 the cards again, state and spell your name, face the  
3 court reporter when you speak. But if you insist on  
4 turning to the audience, I understand -- it's hard  
5 not to do that -- step back next to the court  
6 reporter so she can hear you. And please, to the  
7 extent possible, try to focus on how to make the  
8 draft EIS better. Again, I know people want to  
9 express their feelings, and that's okay. But --  
10 okay. Let's get this going.

11 Ralph Jacobson.

12 MR. JACOBSON: My name is Ralph Jacobson.  
13 I'm the president of the Minnesota Solar Energy  
14 Industry Association.

15 MR. STORM: State and spell.

16 MR. JACOBSON: Okay. Ralph, R-A-L-P-H.  
17 Jacobson, J-A-C-O-B-S-O-N. Now I'm caught. Should  
18 I face you or -- I've seen people do it both ways.  
19 I like being able to see somebody's face when  
20 they're talking.

21 What I want to do is I want to contrast  
22 two planning processes that I had, I guess, the --  
23 was honored to be present in or at least aware of  
24 last year. And I will come around to the  
25 recommendation or a comment that relates to the

## Commenter 15 – Ralph Jacobson

## Responses

57

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

draft EIS.

Okay. The -- I live in St. Paul. I was involved in a planning group that was targeted towards state energy policy last year, and we were talking about the light rail corridor along University Avenue. And, you know, here we are, you know, in a room with like 20, 30 people, and Xcel Energy is, you know, expressing, you know, some of their hopes and aspirations about what's going to happen to that corridor. Other people are expressing their hopes and aspirations. So we're all sharing, you know. And there were people sitting around that table who had been fighting Xcel Energy at every legislative hearing at every opportunity for the last two or three decades. And yet when, you know, there was mention of infrastructure improvement along the light rail line, you know, nary a peep, all these people, you know, nary a peep. And then a couple months later, you know, an announcement that I heard over in St. Paul -- takes things a little out of filter over there -- that there was, you know, plan for some infrastructure upgrade that was, you know, targeted towards the central part of Minneapolis. And the contrast is so great that, you know, there's an

## Commenter 15 – Ralph Jacobson

58

1 uproar and a lot of push back that springs up right  
2 away. And I'm thinking, well, so, you know, I'm  
3 aware of talking of infrastructure upgrade. Let's,  
4 you know, get used to that euphemism, because it  
5 involves power lines, it involves substations, and  
6 yet there was such a different response. And I was  
7 wondering what was it that caused, you know, the  
8 outcry here. And what comes to me is that there was  
9 an, I guess, understanding in the light rail line in  
10 St. Paul that there was an environmental benefit  
11 that goes along with that infrastructure upgrade,  
12 because there was talk of smart grid, there was talk  
13 of some programs that we may use the federal  
14 stimulus money and get some renewable energy along  
15 the corridor and some of that response.

16 Well, so it just seems to me that even  
17 though, you know, we should be thrilled -- you think  
18 of 95 percent of people in the world and we told  
19 them we're bringing in a power line that's going to  
20 increase reliability to 100 percent or 99.9 percent  
21 and they're going to get the power at 8 cents a  
22 kilowatt hour, good Lord, you know, 95 percent of  
23 the people in the world would be absolutely  
24 thrilled. But we have -- and it's plainly obvious  
25 here today that we have another criterion. There

## Responses

**Commenter 15 – Ralph Jacobson**

**Responses**

15-1

59

1 needs to be an environmental benefit. There needs  
2 to be a perception that there's an environmental  
3 benefit to the upgrades because it's not good enough  
4 just to bring in that -- an increased reliability at  
5 8 cents a kilowatt hour because we perceive that  
6 there is a consequence now. Maybe we weren't aware  
7 of the consequences 25 years ago. Now we are.  
8 Right now I'm reading Thomas Freedman's  
9 Hot, Flat and Crowded. You all should read Chapter  
10 10, even if you don't read the rest of the book.  
11 But there's vision of the smart grid that he lays  
12 out there that really does kind of lay out what his  
13 idea of where the utilities could be going if we  
14 were encouraging, could come up with the right  
15 policy demands. And the utility then becomes the  
16 partner in the plane, in all the things that  
17 Angelina was talking about and the things that Scott  
18 was articulating.  
19 So I really think that the environmental  
20 impact statement is lacking something if it does not  
21 have something called environmental benefits in any  
22 program that's being proposed.  
23 Thank you.  
24 MR. STORM: Mark Ambroe. State and  
25 spell, please.

15-2

**Comment 15-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 15-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 16 – Mark Ambroe**

1 MR. AMBROE: My name is Mark Ambroe.  
2 M-A-R-K. Ambroe, A-M-B-R-O-E. I want to, first of  
3 all, make a case for supporting the city's plan for  
4 this, which is bury the lines under East 28th  
5 Street. I, like one other person who spoke here  
6 tonight I thought very eloquently, express  
7 frustration that this wasn't done as part of the  
8 East Lake Street facelift; and we wouldn't even need  
9 to be here having this conversation if there had  
10 been some coordination and planning between Xcel and  
11 perhaps city works, city of Minneapolis, city  
12 council, whomever.  
13 So going forward I want to learn from the  
14 past and say let's integrate the resurfacing --  
15 eventual resurfacing of East 28th Street with  
16 putting the line there, if at all possible.  
17 I very much respect the needs of  
18 businesses for power. I work for a business right  
19 along the Greenway, actually, that is subsidized by  
20 Allina, which has been a huge boom to South  
21 Minneapolis, Minneapolis in general. Recruiting  
22 them into the city has been a very good thing.  
23 They're likely one of the people complaining about  
24 not having enough power.  
25 Same with the Midtown Greenway -- or the

16-1

16-2

16-3

**Responses**

**Comment 16-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 16-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 16-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 16 – Mark Ambroe**

1 Midtown global market, that complex needs power. I  
2 fully respect that. The way to get that power to  
3 them is under East 28th Street. I don't believe  
4 it's under the Greenway, the Midtown Greenway,  
5 either above or below. I think above it's going to  
6 have a washing effect; yes, we'll get power to the  
7 entities that need it, but at the same time we're  
8 going to depress property tax revenue, we're going  
9 to depress property values and livability. It's  
10 going to be a wash. And this neighborhood  
11 desperately needs investment, and those -- what we  
12 have needs to be retained. So we can't run the  
13 power overhead. It's going to wash out the benefits  
14 of getting more power there.

15 And I have concerns about burying power  
16 underneath the bike path. As somebody said  
17 earlier -- I haven't read the DEIS in detail -- but  
18 the perspective of the effect of the high voltage  
19 lines is how it affects most of the people in the  
20 cars. And the path is used by pedestrians who are  
21 much lower to the ground or traveling much slower,  
22 and the effects may well be different. And so,  
23 therefore, again, I think the power needs to be  
24 delivered where -- needs to be delivered along East  
25 28th Street.

16-4

16-5

**Responses**

**Comment 16-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 16-5**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 16 – Mark Ambroe; Commenter 17 – Sarah Graham**

**Responses**

16-6

62

1 I use the Greenway for transportation  
2 several times a day probably every day of the year,  
3 and I feel safe riding along the Greenway. I use it  
4 a lot. I'm going to feel the effects of whatever  
5 happens. And I have a strong interest in  
6 maintaining that.

7 And then also in preserving the  
8 alternative transportation option that the city has  
9 so strongly invested in and we have seen results in,  
10 we need to preserve that. And putting in lines will  
11 disrupt that because of construction. It will  
12 likely disrupt that because of people's perceptions  
13 about going into an industrial area. And we can't  
14 afford to do that.

15 Thank you.

16 MR. STORM: Sarah Graham. Please state  
17 and spell your name.

18 MS. GRAHAM: Sarah Graham. S-A-R-A-H.  
19 G-R-A-H-A-M. I'm representing Little Earth United  
20 Tribes, and I'm a student at the University of  
21 Minnesota. We just came from a Little Earth  
22 residents board meeting, which is why some of the  
23 members can't be here, because it's still in  
24 progress. But this is what we discussed about the  
25 EIS.

**Comment 16-6**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 17 – Sarah Graham**

**Responses**

1                   And, first of all, regarding the  
2 mitigation measures, environmental justice section  
3 of the EIS, we believe the mitigation measures  
4 should include the offer of employment of any  
5 positions created by the Xcel project to members of  
6 the affected communities. As of now the EIS has not  
7 offered any concrete compensation to members of the  
8 community whose surroundings would be  
9 environmentally and aesthetically and economically  
10 impacted by the project.

11                   Secondly, analysis of distributed lines  
12 and transformers powering Phillips was not performed  
13 when Xcel performed its need analysis in the  
14 community, or at least there's no evidence it was.  
15 This leaves one to conclude the statement of need  
16 and the need stated in the EIS performed assuming  
17 the lack of raw power was a source of power  
18 efficiency in homes and businesses in this  
19 community.

20                   Little Earth proposes that if research  
21 currently underway by the University of Minnesota  
22 demonstrates that the current power system is not  
23 efficient enough to utilize extra incoming power,  
24 that Xcel upgrade the distributor system utilizing  
25 incoming power as a part of the project. This

17-1

17-2

17-3

**Comment 17-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 17-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 17-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 17 – Sarah Graham;  
Commenter 18 – Sue Ann Martinson**

17-4

64

1 measure would ensure that Xcel remains true to  
2 its statements that additional power would be  
3 beneficial to our community.

4 And testimony of historical significance  
5 of these types of projects in minority-dominated  
6 communities feels that the underground route is the  
7 only acceptable option in such a densely-populated  
8 region.

9 Thank you.

10 MR. STORM: Sue Ann Martinson.

11 MARTINSON: Sue, S-U-E, space A-N-N,  
12 M-A-R-T-I-N-S-O-N. I just wanted to look at all of  
13 you. Oh, I forgot one thing quick.

14 First of all, I want to say that I  
15 understand the need for more electricity. There  
16 have been some dim-outs in my building, the lights  
17 flicker for no reason whatsoever. So -- and I live  
18 in a Midtown condo on the Greenway. So the question  
19 isn't about meeting electricity; it's about how we  
20 get it.

21 And I want to say that I also agree with  
22 everything everybody has said here tonight. I would  
23 like to read something from an e-mail that I got.  
24 Okay. It goes like this:  
25 They had those type of power lines, the

**Responses**

**Comment 17-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 18 – Sue Ann Martinson**

1 kind that they're talking about putting up outside,  
2 underground near an elementary school that fed it  
3 into my junior high school. They had many cluster  
4 cases of cancer. The school was Slater Elementary  
5 School in Fresno, California. Erin Brockovich  
6 worked on the case. And then she mentions the  
7 reasons that we need more power, especially because  
8 of Wells Fargo end lines. But, as I said, it's also  
9 affecting my ability.

10 So I think that the health concern is a  
11 huge one. The electromagnetic field is going to  
12 affect everybody. I live a half a block from the  
13 Greenway, half a block from 29th Street. Obviously  
14 if we're going to have -- if we aren't able to have  
15 the environmental study that we want with solar,  
16 then at least let them be underground.

17 Mr. Peterson pointed out how often the  
18 Greenway is used. It's the most used bike trail in  
19 the Twin Cities. So not only -- as you know, it's  
20 not only used for biking. I walk along it, and I  
21 see young families walking along it. And I am very  
22 concerned about the children.

23 Right where I live is a very high  
24 population area with our building, the old Sears  
25 building, which is a Midtown building. And then

**Responses**

**Comment 18-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

18-1

**Commenter 18 – Sue Ann Martinson**

1           there are all the people who use the global market,  
2           which is a very popular spot for people from all  
3           over the Twin Cities. I have a friend who lives in  
4           Highland, and he bikes over to the global market.  
5           You know, he's done that several times.

18-2

6                        So I think in this DEIS it's not clear  
7           that the health research that needs to be done,  
8           looking into this court case and other situations  
9           like it, has certainly not been conducted. Of  
10          course, it should be underground. My notes.

11                       I think that Xcel will actually open  
12          themselves up for lawsuits in the future regarding  
13          these cancer clusters if they do not put it, at  
14          minimum, underground.

18-3

15                       I do also feel that there is an  
16          environmental racism involved here. I really wonder  
17          if they put it in Edina or Wayzata in high  
18          residential areas it wouldn't happen.

19                       And I live in a neighborhood where there  
20          are a lot of people of color and, therefore, there  
21          are a lot of young children of color, and they will  
22          be affected by this.

23                       So, in conclusion, clearly the over  
24          health -- overall health of the whole neighborhood  
25          will be impacted, the environmental health, the

**Responses**

**Comment 18-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 18-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 18 – Sue Ann Martinson;  
Commenter 19 – Gerry Tyrrell**

**Responses**

67

1 site -- we've all talked about -- or a lot of people  
2 have about that, and I certainly agree with that.  
3 And then just the effect on the people who live  
4 there health wise.

5 Thank you.

6 MR. STORM: Gerry Tyrrell. State and  
7 spell, please.

8 MR. TYRRELL: Hi, my name is Gerry  
9 Tyrrell. And it's G-E-R-R-Y. T-Y-R-R-E-L-L. I'm a  
10 member of the Land Use and Transportation Committee  
11 of the Corcoran Neighborhood Organization, and I  
12 have a statement from our committee as well as the  
13 executive committee of the Corcoran Neighborhood  
14 Organization.

15 We are glad that the Corcoran Midtown  
16 Revival Plan was noted and considered on page 121 of  
17 the draft EIS. The Corcoran plan was adopted by the  
18 city council in 2002 as a part of the Minneapolis  
19 plan and imagines transit-oriented development with  
20 office retail and up to 600 units of housing for a  
21 range of income and age groups on three separate  
22 sites totaling ten acres on either side of 31st  
23 Street in Hiawatha. These ten acres are immediately  
24 adjacent to the Lake Street light rail station, and  
25 the proposed Route C alignment would run between

**Commenter 19 – Gerry Tyrrell**

19-1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

them.

In light of the Corcoran plan, we must respectfully disagree with the statement transmission line route would not limit or prevent additional residential development or high-density development on page 126, paragraph 5. There is a substantial reason to believe that the routing of the transmission line on 31st Street would negatively impact potential transit-oriented development at 31st and Hiawatha. Development is already underway on these three crucial sites and represents an important opportunity for economic development to a diverse working class neighborhood like Corcoran. Due to its proximity to the Lake Street station, the site represents a great opportunity for transit-oriented development in the city of Minneapolis. HUD financing is key to the success of mixed-use development like this one, and the presence of high voltage transmission line towers on 31st Street would jeopardize the work that our community and developers have done to implement this shared neighborhood city vision for these sites.

The experience of the Longfellow station, a similar transit-oriented development at 38th

68

**Responses**

**Comment 19-1**

Thank you for your comment. It has been noted and included in the record for this EIS. A discussion of HUD financing appears in Section 5.4.2.2 of the EIS.

**Commenter 19 – Gerry Tyrrell;  
Commenter 20 - Liza Guerra O'Reilly**

19-2

1 Street in Hiawatha located near the 38th Street  
2 light rail station, shows that high voltage  
3 transmission lines can have a serious impact on the  
4 ability of such projects to secure financing. The  
5 presence of nearby high voltage transmission line  
6 towers to the proposed Longfellow Station site have  
7 severely hampered the project's ability to obtain  
8 HUD financing and placed the project on hold  
9 indefinitely as they appeal the decision to the  
10 HUD's Washington, DC office.

19-3

11 So I just want to -- I'm a member of the  
12 Midtown Greenway Coalition also, and I love the  
13 Midtown Greenway. But also I live at 32nd in  
14 Longfellow, and I just want to say that Corcoran is  
15 very concerned about Route C, and we would oppose  
16 any Route C coming through our neighborhood.

17 MR. STORM: Liza O'Reilly. State and  
18 spell, please.

19 MS. O'REILLY: My name is Liza Guerra  
20 O'Reilly. L-I-Z-A. Guerra, G-U-E-R-R-A. O'Reilly,  
21 O, apostrophe, R-E-I-L-L-Y. I live in the  
22 Longfellow neighborhood. I have a son that attends  
23 South High School, and I use the Midtown Greenway  
24 for biking when I can. I am a member of the Midtown  
25 YWCA, and I engage my livelihood for cultural and

**Responses**

**Comment 19-2**

A discussion of HUD financing appears in Section 5.4.2.2 of the EIS.

**Comment 19-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 20 - Liza Guerra O'Reilly**

1 traditional reasons as an indigenous woman. And on  
2 behalf of my son, he's here on his original  
3 homeland, and he's an enrolled member of the Spirit  
4 Lake Nation, the first people here, the land.

20-1

5 I want to make clear that the DEIS  
6 include and clarify that the public advisory task  
7 force failed to include in the nongovernmental  
8 organization section anyone from the highest racial  
9 demographic -- excuse me, racial demographic. There  
10 was no African American or African descent people  
11 that were included, no Latinos, no indigenous  
12 Latinos, nor was there any North Native American  
13 people that sat on that public advisory committee.  
14 This is discriminatory. We were excluded. And I'm  
15 requesting that the public advisory committee  
16 reconvene to reflect the racial demographic of  
17 Nanjio (phonetic) in the neighborhood and the  
18 community affected.

20-2

19 I will identify in the DEIS the school.  
20 And to start out, with 2,000 students at South High,  
21 80 percent are students of color, including African  
22 American, African descent, Latinos, and indigenous  
23 populations.

20-3

24 I also would like to include the day care  
25 centers with children under the age of five, infants

**Responses**

**Comment 20-1**

The statutes and rules governing the review of the Project's Route Permit Application contain provisions for the establishment of an Advisory Task Force (ATF); these provisions can be found in Minn. Stat. 216E.08 and Minn. Rule 7849.5270. For dockets undergoing review in accordance with the Power Plant Siting Act, the Commission has the authority to appoint a citizen advisory task force, determine its charge and size, and appoint its members. The ATF may be comprised of as many persons as may be designated by the Commission, but shall include at least one representative from each of the following: Regional Development Commissions, counties and municipal corporations, and one town board member from each county in which a site is proposed to be located.

The structure of the ATF was designated by the Commission in the Advisory Task Force Proposed Structure and Charge, dated May 21, 2009. It was determined by the Commission that ATF members would be solicited from the following units of government, political subdivisions, and non-governmental organizations: Hennepin County; City of Minneapolis; Regional Railroad Authority; Midtown Greenway Coalition; Minneapolis Ward 9; Minneapolis Ward 8; Minneapolis Ward 6; Minneapolis Ward 2; Central Area Neighborhood Development Organization; Corcoran Neighborhood Organization; East Phillips Improvement Coalition; Elliot Park Neighborhood, Inc.; Longfellow Community Council; Seward Neighborhood Group; Powderhorn Park Neighborhood Association; and Phillips West Neighborhood Association.

Each of the units of government, political subdivisions, and non-governmental organizations selected its own representative to serve on the ATF.

**Comment 20-2**

A discussion of the demographics of the Project Area appears in Section 5.5.1 of the EIS.

**Comment 20-3**

Text in Section 5.4.1.1 was modified and supplemented with a table providing the estimated number of children between the ages of 0-6 and 6-12 (based on available census data) within 500 feet of the transmission lines for each route alternative.

**Commenter 20 - Liza Guerra O'Reilly**

1 all the way to five, and start with the Midtown YWCA  
2 day care center right there on 31st. You shall  
3 consider church and mosques with after-school and  
4 day care programs for children in tutoring in the  
5 affected area.

20-4

6 Under Section 2.1.2, page 63, the PUC is  
7 required to consider cultural values and effects.  
8 There is a right to garden wherever we exercise our  
9 self-determination indigenous people to live upon  
10 the land and have a relationship with our mother  
11 earth, and this is supported by the United  
12 Declarations of the rights of indigenous people.

20-5

13 We have a right to engage in our  
14 traditional practices in our original homelands, and  
15 specifically the people that are here, the First  
16 Nations people that are here, have that right. And  
17 I stand on behalf of my son. He's 16 years old here  
18 and attends South High.

20-6

19 The children will be disparaged, young --  
20 the other woman mentioned electromagnetic fields and  
21 the cancer clusters if you put it right on top of  
22 the school and the day care centers. I'm requesting  
23 evaluation of that in the health and the public  
24 health and welfare of our children in that section.

25 Because there's going to be an increase

**Responses**

**Comment 20-4**

See response to Comment 20-3, which addresses the same concern.

**Comment 20-5**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 20-6**

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

**Commenter 20 - Liza Guerra O'Reilly**

20-7

1 of greenhouse gas emissions with their increase of  
2 55 megawatts to be included and delivered into the  
3 area that Xcel has proposed, it's going to have a  
4 disparaging effect, and I want the greenhouse gas  
5 emissions included as a disparaging effect to our  
6 health because we're going to have a heat island  
7 effect when we're growing our food and we're  
8 collecting. And we don't always tell you these  
9 things because a lot of times when we tell you our  
10 plants and other things are our nemeses, the people  
11 who don't understand indigenous values and  
12 indigenous ways appropriate that information or they  
13 pervert it.

20-8

14 I also want to say the socioeconomic  
15 effects section included in the environmental  
16 justice section they indicate a short-term benefit  
17 with benefit to minor businesses. And I say that is  
18 not true. I say you need to do an analysis of -- if  
19 you took the hundred approximately 28 million, two  
20 hundred million, depending if the lines are built  
21 underground or -- over ground or below with the  
22 substations aboveground or below so this project  
23 could explode to \$100 million if everything is put  
24 below, that if you did an analysis of if you took  
25 that money -- do not let Xcel take that, because

**Responses**

**Comment 20-7**

The Applicant submitted an Application for a Route Permit to the Public Utilities Commission to construct two new distribution substations and two 115 kV transmission lines. The proposed Project does not include increased or new generation sources. As such, power generation and any potential impacts or alternatives to generation are considered outside the scope of the EIS.

**Comment 20-8**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 20 - Liza Guerra O'Reilly;  
Commenter 21 – Peter McLaughlin**

20-8

1 we're paying for it, right, the ratepayers are  
2 paying for it -- and you do analysis between the  
3 created jobs -- the community created their own jobs  
4 as opposed to the jobs, the \$100 million that will  
5 be created if Xcel does this. So if you do the  
6 sustainable energy model that we're talking about  
7 here, distributed energy, versus if Xcel gets \$100  
8 million.

20-9

9 We don't want to pay ourselves. We want  
10 our money to stay in our community. And so we're  
11 asking that there's jobs created with this money so  
12 that our children can be hired who can train the  
13 next generation with our great economy.

20-10

14 Finally, I'd also ask you with health  
15 impact, this is a high demographic of young women  
16 childbearing age, there's a cumulative effect on  
17 women and children and babies with electromagnetic  
18 fields and as well as increased greenhouse gas  
19 emissions and the heat island effect and other  
20 climatic changes that are occurring here in  
21 Minneapolis.

22 I thank you for your time.

23 MR. STORM: Commissioner McLaughlin.

24 State and spell your name, please.

25 MR. MCLAUGHLIN: I am Peter McLaughlin.

**Responses**

**Comment 20-9**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 20-10**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 21 – Peter McLaughlin**

1 P-E-T-E-R. M-C-L-A-U-G-H-L-I-N. I'm a Hennepin  
2 County commissioner and use the Greenway on a  
3 regular basis.  
4 I just want to make a couple of comments  
5 tonight. One, on balance, if you look closely, the  
6 EIS makes a pretty good case for undergrounding this  
7 thing. A lot of things have been said, and you've  
8 heard it in the earlier testimony and you've heard  
9 it all -- you heard it tonight, and you're going to  
10 hear it more. And if -- I think Scott's right,  
11 there would be the possibility of a very -- a group  
12 -- a large group of very unhappy people here if this  
13 construction were going to go forward. But, I mean,  
14 if you look closely, the case is made for  
15 undergrounding these. That's what needs to be made.  
16 It gets kind of key though in the bureaucratic  
17 language and some of the categories, and I want to  
18 talk about some of those specifically. But I just  
19 want to say the we can't emphasize too strongly, the  
20 impairment of the historic resource seems to me that  
21 absolutely requires that it go underground.  
22 The degradation of the green space, the  
23 compromising of the streetcar possibility is here,  
24 if the owner -- the Hennepin County Regional  
25 Railroad owner of the Greenway, we are going to be

21-1

21-2

**Responses**

**Comment 21-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 21-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 21 – Peter McLaughlin

21-2

1 highly resistant to anything that would impair our  
2 ability to ultimately build that streetcar to  
3 connect the southwest corridor.

21-3

4 And the statement about investment,  
5 slowing investment and development, the impacts on  
6 jobs, housing, and environmental justice, it just --  
7 the environmental impact statement doesn't really  
8 seem to capture that. And I want to talk a little  
9 bit more about what's been going on in this  
10 neighborhood. It just doesn't really capture why  
11 all these people care so darn much. These are the  
12 people that have built here. These are the people  
13 who stuck it out when it was tough, and they're  
14 actually building this place back up, and we're  
15 making progress.

16 But this -- I'm going to end with this  
17 later, but we're going backwards with this. High  
18 tension wires on the Greenway or in this  
19 neighborhood, whether it's down in Corcoran or down  
20 on 26th or 28th, that's a step backwards for this  
21 neighborhood. No question about it.

22 UNKNOWN SPEAKER: Amen.

21-4

23 MR. MCLAUGHLIN: So I think one of the  
24 areas that's not covered adequately is the  
25 substation discussion and what the effects are

75

## Responses

### Comment 21-3

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 21-4

A discussion of the geographic footprint of the proposed substation locations appears in Section 1.5 of the EIS. Text in Section 1.2 has been supplemented to include information on the geographic area that would be served by the two new distribution substations under the proposed Project.

Additional information on the Focused Study Area, which is the approximately 22-square mile area of south Minneapolis that would be served by the Project substations, can be located in Appendix D of the Application for a Route Permit, specifically the Summary of Need Analysis and "South Minneapolis Electric Distribution Delivery System Long-Term Study" prepared by Scott Zima of the Distribution Planning Department, Northern States Power Company, dated March 2009.

**Commenter 21 – Peter McLaughlin**

**Responses**

21-4

76

1 there. This whole question of how much space is  
2 needed here and now, how much space is needed in the  
3 future, because a lot of the arguments about the  
4 substations are about future expansion of the  
5 substation and needing enough space to be able to do  
6 that, I think you have to figure out; and I don't  
7 think the EIS does a good enough job talking about  
8 just what geographical area we're actually serving  
9 with this discussion of this substation,  
10 particularly the one on the east side. Just how big  
11 of a geographical area are we going to have; why is  
12 that going to be, you know, on top of this  
13 neighborhood, on top of this green space, on top of  
14 this area. I think that is a place where there's a  
15 question of the adequacy of the environmental impact  
16 statement. The spreading this thing, extra  
17 investment across the whole rate base is absolutely  
18 imperative. It's about the whole grid, the whole  
19 system, so that is an absolute necessity, from my  
20 perspective.

21 I just want to emphasize a couple more  
22 things. This Longfellow station example, I've seen  
23 the documents from HUD. They don't want to finance  
24 units at 38th and Hiawatha. They're in the fall  
25 zone anyway. So what we're talking about here is

**Commenter 21 – Peter McLaughlin**

1 putting up high density wires, whether it's Corcoran  
2 or down on 26th, down on 28th, or the Greenway, and  
3 we're trying to encourage development, and we're  
4 going to create these no-investment zones or at  
5 least a place where the federal government is not  
6 going to want to provide any. And, frankly, that's  
7 going to cost money in the long run.

21-5

8 There are statements about the tax base  
9 in this. Somebody says the tax base is going to go  
10 up if the high tension wire is going up. Well, the  
11 fact is it's going to be more if it's undergrounded,  
12 more taxes paid if it's undergrounded.

21-6

13 And, finally, if you net out the impact  
14 of the real impairment of development here, it's not  
15 just visual impact; we're talking about whether  
16 people are going to want to live there by those  
17 units and whether they're going to want to pay X or  
18 whether they're going to want to pay X plus 10,000  
19 or 20,000 more. I just don't think it captured that  
20 very well.

21-7

21 And then, finally, this thing we suffer,  
22 you know, this isn't a park so it doesn't have that  
23 official park status. But it's a green space, and  
24 it's used as a park. And I think the impacts are  
25 going to downgrade because it's not officially a

21-8

**Responses**

**Comment 21-5**

A discussion of HUD financing appears in Section 5.4.2.2 of the EIS.

**Comment 21-6**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 21-7**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 21-8**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 21 – Peter McLaughlin**

21-8

1 park. I think the same thing is true when you talk  
2 about development; there's not an understanding of  
3 this category of whether the county or the city and  
4 others created community works project. This green  
5 space -- and I used to go out there, and I've used  
6 this line before -- if you're going to go out, make  
7 sure you have your tetanus shot up to date before  
8 you went out on the Greenway for fear of what you'd  
9 step on. I mean, this was a scar running through  
10 this community. We've reclaimed it and invested  
11 \$30 million, and we've got -- there's finally  
12 investment going on along here. It slowed down a  
13 little because of the recession, but this is going  
14 to impair that future development and going to  
15 compromise the community works idea that we've  
16 embraced, which is invest in the infrastructure,  
17 create a new space so that there's a chance for this  
18 economy in this neighborhood, which has had troubles  
19 for years as the industrial economy went away. This  
20 is the way to try to recreate an economy to work and  
21 create economic justice. I just don't think the EIS  
22 quite captures some of those factors. I think it's  
23 important that it do so if you're going to get the  
24 understanding of what's going on here, why there's  
25 so darn many people showing up tonight and every

78

21-9

**Responses**

**Comment 21-9**

Text in Sections 5.2.1.3 and 5.3.1.3 has been modified and supplemented to include information on the financing and history of the Midtown Greenway.

**Commenter 21 – Peter McLaughlin; Commenter 22 – Carol Pass**

**Responses**

1 night from now on when it's discussed, because it is  
2 important. It's about the rebirth of this  
3 community, reinvestment, and the spirit that these  
4 people have had, and now they're getting some  
5 reinforcement. This is a setback if we put these  
6 things aboveground, and we need to make sure we are  
7 taking action.

8 Thank you.

9 MR. STORM: Carrie Ann Johnson.

10 UNKNOWN SPEAKER: She left.

11 MR. STORM: Carol Pass.

12 MS. PASS: My name is Carol Pass.

13 C-A-R-O-L. P-A-S-S. And I live in the East  
14 Phillips neighborhood. You don't need the address,  
15 do you?

16 MR. STORM: No.

17 MS. PASS: I think that the EIS just  
18 doesn't capture some things. I think it actually  
19 fails and creates a false impression. I think of  
20 all the things that we talked about here, the  
21 beauty, the parks, the possibility of a streetcar,  
22 all of these, the reinvestment, et cetera, pales in  
23 significance with regard to what happens to kids as  
24 a result of the electromagnetic fields and their  
25 impact on health. I think that the effect on

22-1 |

**Comment 22-1**

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

**Commenter 22 – Carol Pass**

**Responses**

22-1

80  
1 children is the most important thing in this whole  
2 thing. And I find that only about three slim pages  
3 are devoted to that in this document, 238, 239, and  
4 240. And the information here -- now I have to --  
5 now that I finished with it, now I have to become an  
6 expert in EMF. And this is getting really tiresome.  
7 I'm really waiting for when we're done with the next  
8 big mirage. But, anyway, this is the limits of my  
9 expertise at this time, but I'm planning on doing  
10 much better.

22-2

11 So, anyhow, the -- you say -- you say --  
12 this is your conclusions here: The scientific  
13 evidence suggesting that ELF-EMF exposure, that they  
14 pose any health risks is weak. The -- virtually all  
15 laboratory evidence in animals and humans and most  
16 of the mechanistic work done in cells fail to  
17 support a causal relationship between exposure to  
18 ELF-EMF at environmental levels and changes in  
19 biological function or disease status. The lack of  
20 consistent positive findings in animals or -- this  
21 doesn't even -- this isn't grammatical. I'm a  
22 teacher. I care about these things. Findings in  
23 animals or mechanistic studies weakens the belief  
24 that there is an association. In our opinion, this  
25 finding is insufficient -- these findings are

**Comment 22-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 22 – Carol Pass

## Responses

22-2

81

1 insufficient to warrant aggressive regulatory  
2 concern.

3 It goes on, The general scientific  
4 consensus is that thus far the evidence available is  
5 weak and is not sufficient to establish a definitive  
6 cause-and-effect relationship. And according to  
7 World Health Organization, exposures -- well,  
8 they -- they don't -- what we're talking about here  
9 does not produce any known adverse health effect,  
10 and this is -- nor has been able to understand  
11 biological mechanism of how EMF can cause adverse  
12 effects.

13 Now, it's interesting because we don't  
14 really know how ALS or how Alzheimer's or how cancer  
15 really accomplishes what it does, but we do have  
16 effective waste petroleum, and we really think we  
17 should do something about it, even though we really  
18 don't understand it. And what you're suggesting  
19 here is the fact that we don't understand what this  
20 means, that we should just proceed.

21 Now, let's look at some other  
22 information. The U.S. National Cap & Science stated  
23 in 1997 -- I'll put in my -- that the link between  
24 power line EMF and childhood leukemia is  
25 statistically significant, in other words, unable to

**Commenter 22 – Carol Pass**

1 have arisen from chance and is robust. The National  
2 Institute of Environmental Health Sciences in 1999  
3 says, summarized, The strongest evidence for health  
4 effects comes from associations observed in human  
5 populations with two forms of cancer, childhood  
6 leukemia and leucocytic leukemia, and occupationally  
7 exposed health. And this World Health Organization  
8 quote says that, The epidemiological data show an  
9 association between magnetic field exposure and  
10 increased risk of childhood leukemia. All three  
11 reports have accepted the demonstration of a  
12 statistically-significant relation between exposure  
13 to elevated magnetic power line fields and childhood  
14 leukemia.

15 Now, your three pages really need to be  
16 far more extensive. 16 epidemiological studies  
17 concluded that the observed results identify a  
18 consistent risk that cannot be explained by random  
19 variations. Now, with regard to how do we figure  
20 this out, we don't really know how this works. We  
21 don't really understand it. But -- and we don't  
22 have a mechanism now. The suggestion in your pages  
23 says that statistical studies looking at who has  
24 what and how much of it is called dose dependent  
25 study, the significant relationships; but when you

22-3

22-4

**Responses**

**Comment 22-3**

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

**Comment 22-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 22 – Carol Pass

83

1 look at ethnology, the causal connection's usually  
2 determined by seeing a rise in instances of as you  
3 get more and more exposure. As you get less and  
4 less exposure, there's less of it. If it's  
5 longer-term exposure, you get more cancer. If  
6 there's less, you get less. We don't understand the  
7 mechanism, but we have clear studies to show this,  
8 and this is what we use to figure out how to deal  
9 with cancer. And many, many diseases we don't  
10 understand. It's no fault -- actually this person  
11 who's a scientist says that this increase in --  
12 increase and decrease with respect to the amount of  
13 exposure is usually considered the goal standard in  
14 determining a causal relationship. We don't really  
15 need to know the mechanism to know that there's a  
16 problem here. And what the point -- the point is  
17 that that increased risk is based on closest to the  
18 power lines and more and more incidents of this or  
19 less and less if you're further away.

20 Furthermore, you know, there are studies  
21 done on these things. Some commentators, including  
22 this report, suggest that only a small number of  
23 children are affected so no public health concerns,  
24 so public health is not a substantial concern. But  
25 we don't really -- at present we don't really know

## Responses

## Commenter 22 – Carol Pass

84

1 enough to even know how many kids are affected by  
2 this. We don't understand this. This is -- this  
3 whole scientific endeavor is in its infancy, but we  
4 clearly know that there is a higher rate if you have  
5 more exposure, a lower rate if you don't. And this  
6 is critical.

7           And I -- you know, I have to say, having  
8 worked on the burner (phonetic) and worked very hard  
9 to learn everything, one of the most astounding  
10 things I found that came out of that study in the  
11 big study that was done for that and pushed that  
12 whole process was somewhere in those pages -- which  
13 I don't think they expect you to read, they don't  
14 expect you to read all this stuff, and what I found  
15 is at one point they said we don't know what dioxins  
16 really do and we're not really sure how much will  
17 come out of the smokestack, so what we're going to  
18 do is test the stack after we build it. This is  
19 brilliant. I mean, I read that and I thought whose  
20 brain worked on this? I mean, then we have the  
21 thing and we couldn't get rid of it, and we covered  
22 that we've got dioxins coming out to a degree that  
23 it's going to, you know, retard all the children or  
24 something. I couldn't believe what I was reading.  
25 There are whole -- if you page through that

## Responses

**Commenter 22 – Carol Pass**

1 document, there are tons of things like that. And I  
2 was shocked. I was shocked at the level of science.  
3 I was shocked at the level of disregard. I was  
4 shocked at the unwillingness to be expansive in  
5 looking at the evidence. And I -- it made me so mad  
6 that for two years of wretched process trying to  
7 stop that thing.

8 And I have to say there's -- this study  
9 also says that there is no good animal model system  
10 that reproduces, demonstrates the development of  
11 cancer in response to this. There is no mechanism  
12 we can say, gee, I figured out how this works. But,  
13 you know, we don't need to know that. We just need  
14 to know what happens. That's what we need to know,  
15 the consequences. That's enough. That's enough to  
16 figure out that we either can't have this at all or  
17 that we -- or that we -- or that we must bury it.

18 There's a lot of science that hasn't been  
19 done. There's a lot of shielding that can happen.  
20 It says that this doesn't happen at all, and yet we  
21 know that if you find the wonderful version of  
22 putting it underground, if you bundle the power  
23 lines, it alters the effect of the electromagnetic  
24 waves and reduces their effect. So this is another  
25 good reason for putting them underground, because

22-5

**Responses**

**Comment 22-5**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 22 – Carol Pass; Commenter 23 – Vivian Klauber**

**Responses**

1 less effect and less damaging. So there are things  
2 that we're learning. This whole thing is in its  
3 infancy. But I think the highest priority has to be  
4 the kids. How much science do we need if we know  
5 something bad is coming for our children? We don't  
6 need very much. We don't really need a response to  
7 that. And I think that is has to be a fundamental  
8 concern. Aesthetics are wonderful, but they're  
9 nothing compared to the life of our children.

10 Thanks.

11 MR. STORM: Vivian Klauber. State and  
12 spell it. I butchered that.

13 MS. KLAUBER: Thank you. Vivian,  
14 V-I-V-I-A-N. Last name Klauber, K-L-A-U-B, as in  
15 Bob, E-R. And I live in Longfellow. I was -- I was  
16 really thrilled to hear many speakers before me  
17 because I was going the same way. I was looking  
18 into this 30 years ago, way back when Rachel Carson  
19 was still riding and we were learning about these  
20 same issues about power lines going up in urban  
21 areas, and then the difference when they were moved  
22 to rural areas and how the evidence was proven in  
23 both. The limitations, however, were proven, of  
24 course, even more in urban areas. So I'd like to  
25 speak briefly about my concerns with the health

**Commenter 23 – Vivian Klauber**

1 impact, once again, of this substation, tower, and  
2 lines on people, animals, and plants using the  
3 Greenway and living in proximity.

4 International research has proven -- and  
5 I'm going to put my glasses on because I can't read  
6 my own handwriting. International research has  
7 proven that people experience lack of energy in the  
8 vicinity of EMF. There is an increase, as you  
9 already heard, of various kinds of cancer,  
10 especially leukemia. The clusters are defined by  
11 the exposure at a specific radius of these lines and  
12 towers. There have been birth defects, including  
13 spontaneous abortion, in animals and in people,  
14 abnormal growth noted in children and animals,  
15 decrease immunity, and more. So I'm going to be  
16 brief because you've heard a lot of this information  
17 already.

18 I would like to note that our country has  
19 had a nasty habit of putting these kinds of projects  
20 in economically-challenged, diverse ethnic  
21 communities, and I think it's time that we end this  
22 practice and focus on placement in industrial parks  
23 or in corporate headquartered land.

24 I would also like to end by saying that  
25 if there weren't as many trees in my area, I would

**Responses**

**Comment 23-1**

Thank you for your comment. It has been noted and included in the record for this EIS.

23-1

**Commenter 23 – Vivian Klauber; Commenter 24 – Tim Springer**

23-2

88

1 be putting solar plates on my roof. I support  
2 alternative renewable energy solutions, and I would  
3 like to encourage this project to be put on hold  
4 until the U.S. Department of Energy establishes  
5 institutional innovations in energy, in the energy  
6 field. And this kind of project will probably no  
7 longer be needed.

8 Thank you.

9 MR. STORM: Tim Springer. State and  
10 spell, please.

11 MR. SPRINGER: Hi, my name is Tim  
12 Springer. T-I-M. S-P-R-I-N-G-E-R. And I'm going  
13 to move this so I can talk to you guys in front of  
14 you. Is that okay?

15 Okay. Thank you for undertaking this  
16 massive EIS project. The good thing about it -- oh,  
17 I should mention, I'm affiliated with the Midtown  
18 Greenway Coalition as a staff person. I also live  
19 in the Midtown area and use the Greenway at least  
20 six times a day. And just as a really personal  
21 note, these lines going over make my heart very  
22 heavy every time I use the trail. I think it will  
23 happen for a lot of people.

24 The good things about the draft  
25 environmental impact statement are that there are

**Responses**

**Comment 23-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 24 – Tim Springer

89

1 references in, I believe, 7 of the 13 impacted  
2 resources that putting the lines underground will --  
3 is a potential mitigation strategy for the negative  
4 impacts on these resources.

5 And the detail that's offered regarding  
6 putting overhead lines in a residential community  
7 and running them on the sidewalk near the roadway is  
8 really helpful to understand. Three- to  
9 four-and-a-half-foot wide tower bases right up on  
10 the sidewalk are out of scale, they cause safety  
11 problems at intersections, they may make it hard to  
12 get a wheelchair to the sidewalk. It's totally out  
13 of scale for pedestrians development, which is bike  
14 and pedestrian. Development along this area is what  
15 this Greenway is all about. So thank you for  
16 recognizing those things. And there are many other  
17 reasons why putting them underground is a good  
18 thing. So that's great.

19 And the fact that there is an underground  
20 route on East 28th Street the Midtown Coalition  
21 favors is great and that that is still on the table  
22 as strongly as any other underground route along the  
23 Greenway. The reference to spreading the extra  
24 costs for undergrounding over the entire rate base  
25 much larger than the city of Minneapolis is great.

## Responses

### Comment 24-1

Thank you for your comment. It has been noted and included in the record for this EIS.

24-1

## Commenter 24 – Tim Springer

90

1 And by identifying those various known extra costs  
2 statewide over a five-year period for Route A  
3 underground on 28th would only be 19 or 20 cents  
4 more per ratepayer per month for a period of five  
5 years. That's a pretty small thing to save this  
6 part of town. So that's great.

7 And linking that environmental justice  
8 and not making this area have to pay to protect our  
9 community is an appropriate finding as well.

10 Problems with the draft environmental  
11 impact statement. Not enough attention is paid to  
12 electromagnetic field. All overhead routes show an  
13 average exposure within 25 feet of the center line  
14 of 7 to 26 milligauss, not a peak exposure average,  
15 7 to 26 milligauss, whereas we believe with -- we  
16 can agree with the experts that suggest 4 milligauss  
17 or higher is unacceptable and increases the risk of  
18 childhood leukemia. And all these overhead routes  
19 have hundreds of dwellings within 25 feet. And the  
20 younger the child, the greater likelihood that child  
21 will be impacted.

22 An inadequate response to neighborhood  
23 concerns about the Hiawatha West substation site.

24 It would have been nice to see more attention paid  
25 to the alternative substation locations rather than

24-2

24-3

## Responses

### Comment 24-2

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

### Comment 24-3

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 24 – Tim Springer

24-3

1 just aiming pretty much at Hiawatha West, which  
2 would lose this very critical green space, which is  
3 the only location in the five-and-a-half miles  
4 across the city where the Midway Greenway actually  
5 passes through the middle of a green space as  
6 opposed to along its edge and having a different  
7 elevation, and this particular location at the nexus  
8 of our two -- our state's two most important  
9 transportation features, our only light rail line  
10 and the busiest bikeway in the state.

24-4

11 Also, the EIS does not properly address  
12 conservation and distributed generation such as  
13 solar cells on roofs as a way to -- we would, of  
14 course, like to have seen the power that's needed in  
15 this area be provided through these means. For that  
16 to happen, at least implement these measures as  
17 mitigation as a part of this project and avoid  
18 expanding the project in the future because we're  
19 doing same wall. We know that a combination of  
20 distributed generation and smart grid and  
21 utility-fueled batteries charged off peak and peak  
22 back in power during peak and conservation all can  
23 add up to avoiding these lines. We know that. So  
24 it's frustrating that the lines need to go in. But  
25 if they have to go in, by Xcel's own admission,

91

## Responses

### Comment 24-4

The issues of need, including size, type and timing; questions of alternative system configurations; or questions of voltage, were identified to be outside the scope of the EIS in the Scoping Decision, signed by the Director of the OES on September 3, 2009.

**Commenter 24 – Tim Springer;  
Commenter 25 – Michael Troutman**

1           there may be an additional line and probably will  
2           be -- it's in the plans to be an additional line  
3           heading east from the Hiawatha substation and west  
4           from the Midtown substation in the future. No, it's  
5           2010. We shouldn't be doing this anymore. So let's  
6           make sure that if there's approval for these lines  
7           that we keep it from expanding by doing what we  
8           should have done this time around by conservation.

9                        So thanks so much. Don't mess with the  
10           Greenway.

11                       MR. STORM: Michael Troutman.

12                       MR. TROUTMAN: Michael Troutman. Trout  
13           like the fish with a man on the end. So this will  
14           be brief because we're getting dangerously close to  
15           my bedtime. I have been a resident of this  
16           neighborhood since 1981. Our family, we own and  
17           live in a house that's several blocks off the  
18           Greenway. So, indeed, I do have self-interest in  
19           the impact that line along the Greenway would have  
20           on our family and on our home and on our property  
21           value.

22                       That said, I'm also concerned about the  
23           impact on existing businesses and on future business  
24           development that has been outlined by many people.  
25           It doesn't take a business degree, although I have

25-1

**Responses**

**Comment 25-1**

A discussion of the potential impact of the Project on commercial and residential development appears in Sections 5.2.2.1 and 5.4.2.2 of the EIS.

## Commenter 25 – Michael Troutman

93

1 one of those, to see the potentially negative  
2 consequences for good business development along our  
3 Greenway corridor.

4 But what I wanted to spend just a couple  
5 minutes talking about was why are we facing this  
6 decision in the first place? How did we get to  
7 this, someone said, 20th Century decision in the  
8 21st Century? And it got me thinking about the  
9 decision-making process that is unfolding here. I  
10 wonder if you might step back and think about that  
11 for a minute.

12 And I want to start by saying I don't  
13 question the sincerity or goodwill of the  
14 individuals working at Xcel Energy. The individuals  
15 that I have known over a period of decades are  
16 people of goodwill, they're good, caring people.  
17 But based on my experience working in large  
18 organizations, be they corporate -- I've had  
19 experience in corporate -- government, and  
20 nonprofit, it's easy to get trapped in to certain  
21 acceptable ways of thinking. And it could be very  
22 difficult to envision a radically different way of  
23 doing things. It can easily be that the rewards,  
24 both financial and professional, are achieved by  
25 supporting the existing corporate objectives and

## Responses

**Commenter 25 – Michael Troutman**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

procedures.

I submit that our community here is represented tonight. We have a different calculus. We're focused on what's best for our families, for our children and our grandchildren and our great grandchildren, and looking at what will be sustainable in the long term for them.

As Angelina and others have mentioned, part of the vision is to evolve from an energy system that is focused on large centralized energy production to one that is centered in truly distributed neighborhood-based energy. Now, obviously this kind of change is going to require existing energy producers and energy regulators to adopt different corporate and regulatory philosophies. I do not believe that a high voltage power line along the Greenway serves our community's needs, even though it may meet some short-term corporate needs at our local energy producer.

I challenge each of you at Xcel Energy, at the PUC, and all of us here in this room to sincerely work together to build an alternative energy future that will be sustainable in the long term for our community.

Thank you.

25-2

25-3

**Responses**

**Comment 25-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 25-3**

See response to Comment 24-4, which addresses the same concern.

**Commenter 26 – Amanda Dlouhy**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. STORM: Amanda Dlouhy. Please state and spell.

MS. DLOUHY: My name is Amanda Dlouhy. A-M-A-N-D-A. D-L-O-U-H-Y. And I live on the 2900 block of Portland Avenue across from the proposed substation. And I'm with the Phillips West Neighborhood Organization, and I'm also on the board of the Midtown Greenway Coalition.

I'd like to talk today just about the Midtown substation. I don't feel that too much attention has been paid to that. And one of the reasons is because, from the very beginning of this process, the Phillips West neighborhood has just been kind of completely at a loss about where you might put the substation in our neighborhood. And it seems like options are either, one, in the middle of a residential block or, two, on a commercial or industrial property that we value because it brings jobs to our neighborhood.

And I'd just like to stress that the options that are in the middle of residential block are really in the residential area. And generally it has been talked about as being a vacant lot, a vacant house, and property already owned by Xcel. But, actually, if you go to look at it, it's really

26-1

**Responses**

**Comment 26-1**

Text has been edited in Sections 5.2, 5.4, and 5.5 to note that the Midtown North and Midtown South Substation locations are within residential and commercial areas.

**Commenter 26 – Amanda Dlouhy**

**Responses**

26-1

1 just, you know, a few feet from the next lot where  
2 there are people living. And that applies to both  
3 the Midtown North and Midtown South substation.  
4 And because I help to manage the property  
5 right across the street, I know that those houses  
6 are really being looked on and are -- people made an  
7 effort to get good tenants in the area. So I'd like  
8 to stress that.

26-2

9 And, of course, I just stress that the  
10 people living in the area are young families with  
11 young children, people of color that don't speak  
12 English necessarily, and that these people are  
13 desperate for housing. So in some parts of the  
14 project area it might be an issue of people moving  
15 away and not building new development in the area  
16 that the power lines go in. But in this area it's  
17 actually an issue that people will live there no  
18 matter what because they're desperate for housing.

26-3

19 And that brings up what I'd like to hear  
20 more about in the environmental impact statement,  
21 which is the health impacts of the substation. And  
22 I'd like to hear more details about noise from the  
23 substation and also how the line would actually  
24 connect with the substation and if that connection  
25 would make any more danger from EMF or anything

**Comment 26-2**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 26-3**

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS. A discussion of potential noise impacts from the substations appears in Sections 5.14.1.2 and 5.14.2.2.

**Commenter 26 – Amanda Dlouhy; Commenter 27 – Aisha Gomez**

**Responses**

26-3

1 else. And it would be useful to see a rendering of  
2 the PUC decisions in the EIS.

26-4

3 And I'd like to mention that we're happy  
4 that the EIS is considering our land use plan, but  
5 I'd like to stress that these parcels, the parcel  
6 along the Greenway, have been marked as high density  
7 development and future green space. Because there  
8 are very few other places in our neighborhood that's  
9 even possible, because our neighborhood is very full  
10 with other things. And so these are not just areas  
11 where we'd like to see high-density development, but  
12 they are literally the only places where it's even  
13 possible.

26-5

14 And, finally, I'd like to see some  
15 assurances in the EIS that this new infrastructure  
16 will provide us residents, businesses, everyone with  
17 technology to someday sell locally-generated power  
18 back to the grid. And I think without that, the  
19 whole project loses much of its potential to help  
20 residents in the neighborhood.

21 MR. STORM: Aisha Gomez. Sorry about  
22 butchering it.

23 MS. GOMEZ: Oh, that's okay. That  
24 happens. Aisha Gomez. A-I-S-H-A. G-O-M-E-Z. I  
25 work for the Women's Environmental Institute in the

**Comment 26-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Comment 26-5**

See response to Comment 20-7, which addresses the same concern.

**Commenter 27 – Aisha Gomez**

1 Phillips neighborhood. I live at East Central, like  
2 two blocks away from the Greenway on Portland  
3 Avenue.

4 My nephew is 18 months old, and he lives  
5 three-quarters of a block away from the Greenway,  
6 and my sister is expecting a second child in  
7 October. My God kids go to day care at the YWCA.  
8 So I have -- you know, my children who are nearest  
9 and dearest to my heart are going to be directly and  
10 consistently exposed to EMF as a result if, you  
11 know, the proposed aboveground transmission line  
12 goes in on the Greenway.

13 I'm a little -- there are a couple of  
14 things, I guess, I was a little confused about in  
15 the EIS, because we have this section about  
16 environmental justice. And so it goes through the  
17 demographics of the neighborhood, establishing that,  
18 you know, there are these two standards, which are  
19 -- one of which is like is half of the neighborhood  
20 constituted by people of color and is half the  
21 neighborhood low income. And there's this other  
22 thing like is the population, the like median  
23 income -- like median -- or the number of low-income  
24 people 20 percent higher than that of the State of  
25 Minnesota and the same for people of color. And so

27-1

**Responses**

**Comment 27-1**

Information was collected from the U.S. Census Bureau (USCB), the Minnesota Department of Administration (MDA), and the city of Minneapolis to determine the demographic characteristics of the population within 11 neighborhoods/communities in Minneapolis. Comparisons of the individual neighborhoods/communities were made to the state, county, and city of Minneapolis using two established standards – i.e., greater than 50 percent and greater than 20 percentage points.

Table 5.5-30 provides a summary of the minority population, low-income population, and limited English proficiency for each route and substation alternative. For Routes A, B, and D, the minority population is 60.4 percent and the low-income population is 28.1 percent. For Route C, the minority population is 59.7 percent and the low-income population is 25.9 percent. For Route E2, the minority population is 51.2 percent and the low-income population is 25.5 percent. For the Midtown Substations, the minority population is 68.4 percent and the low income population is 32.8 percent; for the Hiawatha Substations, the minority population is 28.7 percent and the low-income population is 9.5 percent.

As discussed in Section 5.5.2.3, direct effects are limited with regard to minority and low-income populations. Two businesses may be removed or relocated depending on the substation selected. No residents are anticipated to be relocated. These effects would be felt by all residents, customers, and employees within the area. However, this may impact minority and low-income populations to a greater extent, since the businesses are located in areas where these populations are more numerous than other areas of the city.

In addition to these impacts, minority and low-income populations may experience indirect effects to a greater extent than other populations. These indirect effects include noise, visual intrusions, a decrease in property values, construction disturbances, and possibly limited or restricted access to certain areas in which construction will occur.

No adverse health and safety impacts are anticipated for the local population, regardless of minority and low-income status.

**Commenter 27 – Aisha Gomez**

27-1

1 most of the neighborhoods that are going to be  
2 impacted by these lines do meet that standard. And  
3 as a lot of people have talked about tonight, low  
4 income, indigenous, and communities of color have  
5 disproportionately been affected. But it then goes  
6 on to say that -- on 231, that no alternatives are  
7 expected to produce adverse health and safety  
8 impacts to local population and, in particular,  
9 minorities/low-income populations. And so I guess  
10 I'm a little bit confused about how it is that the  
11 EIS goes through and establishes what the  
12 demographics of the neighborhood are and then says,  
13 oh, this isn't going to contribute to the  
14 disproportionate health burden that the communities  
15 directly around these lines bear.

27-2

16 It -- also there's a little bit of kind  
17 of like compartmentalizing about the health issues  
18 throughout the DEIS. And, you know, we're human  
19 beings and we're these organisms, and health isn't  
20 compartmentalized for us because we're just this one  
21 organism. So like, you know, it talks about lead,  
22 it talks about asbestos, it talks about arsenic. As  
23 most of us know, we have -- there's arsenic in our  
24 soil. A lot of our housing before 1981 could very  
25 well have asbestos in it. Houses before '78 could

99

**Responses**

**Comment 27-2**

A discussion of existing health issues in the Project Area, including arsenic and other soil contaminants, asbestos, and lead, appears in Section 5.6.1.1 of the EIS. Although these contaminants are present in the Project Area, the Project related impacts to health and safety are expected to be minimal.

**Commenter 27 – Aisha Gomez**

**Responses**

27-2

100  
1 very well have lead paint in it. So a lot of this  
2 stuff is still there. So I guess I'm a little bit  
3 worried about the way that -- like this section is  
4 supposed to be concerned with environmental justice  
5 and is disconnected from the discussions about  
6 health.

27-3

7 I also didn't see any information in the  
8 environmental impact statement about health  
9 insurance, access to, you know, affordable and  
10 competent medicare, because we're also dealing with  
11 a situation like where, you know, people who are  
12 exposed to sources of ill health and also don't have  
13 access to, you know, kind of like the things that we  
14 know create good health. So it would be great if  
15 that kind of disconnect could be addressed.

16 Again, Carol talked about this, but one  
17 of the things that I picked out was, you know, on  
18 page 240, epidemiological results do show weak but  
19 consistent association between childhood leukemia  
20 and EMF. And then it goes on to talk about how  
21 we're not quite aware of what the mechanism is. But  
22 there was this interesting thing that I hadn't --  
23 you know, in doing research about this, I had never  
24 heard about this. But on page 240 it talks about  
25 the Henshaw hypothesis. It says that transmission

**Comment 27-3**

Potential indirect impacts of the Project on access to health insurance were not identified as potential impacts to health and safety that require review in the EIS in the Scoping Decision, signed by the Director of the OES on September 3, 2009. Potential indirect impacts to health insurance are considered outside the scope of the EIS.

**Commenter 27 – Aisha Gomez**

101

1 lines -- this is a theory -- transmission lines  
2 could increase the amount of air pollution that the  
3 human body retains because it ionizes particles of  
4 air around the line, creating what they call corona  
5 ions, which are like described as being sticky. And  
6 so it means that when these corona ions come into  
7 contact with air pollution that they stick in your  
8 lungs more. And that's kind of like the theory for  
9 the mechanism of this. So, you know, due to the  
10 work of people like Carol and other people in the  
11 neighborhood and Karen Clark, our legislator, we  
12 have a lot of cumulative health impact law in  
13 Phillips, which means that before a new source of  
14 pollution contributes into the neighborhood, there  
15 has to be an analysis done of the cumulative impact  
16 of the new source. And so, in particular, this  
17 idea, you know, we're talking about we have a lot of  
18 mobile sources of pollution in the neighborhood  
19 because there are, you know, big thoroughfares  
20 surrounded by freeways. We also have things like,  
21 you know, asphalt plants and stuff on the  
22 perimeters. And so if this Henshaw is actually  
23 true, I think that it needs -- basically what I'm  
24 saying is that the whole thing kind of needs to be  
25 contextualized. The health issue needs to be

27-4

**Responses**

**Comment 27-4**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 27 – Aisha Gomez**

27-4

1 contextualized in terms of like what's actually  
2 going on in the neighborhood already. And that's  
3 like a major thing that isn't covered in this.

27-5

4 Also, this falls outside, I think, of the  
5 scope of the draft EIS, but personally I find it a  
6 little bit cynical that what appears to have  
7 happened is that, you know, like if it -- if this  
8 project were ten miles or longer, you have to file a  
9 certificate of need. And so it looks like you guys  
10 are kind of like busting the project up into little  
11 parts. So this section is, oh, one-and-a-half  
12 miles, so we don't need the certificate of need.  
13 And then the next is three-and-a-half miles and,  
14 guess what, that's not a hundred miles either so  
15 that doesn't need to be in the certificate of need.  
16 So I guess it appears that something's happening to  
17 make it so that there is this extra level of  
18 scrutiny that this plant is exposed to.

27-6

19 And I guess I'm going to close by  
20 echoing what Carol was talking about and the  
21 gentleman earlier, whose name was Mehmet, that we  
22 need to -- when we're talking about the health,  
23 particularly of vulnerable populations, that we need  
24 to err on the side of caution, that we need to  
25 invoke the cautionary principle, that whatever our

**Responses**

**Comment 27-5**

Minnesota Statute Section 216B.243, subd. 2 states that no large energy facility shall be sited or constructed in Minnesota without the issuance of a Certificate of Need by the Commission. A large energy facility is defined to include transmission lines between 100 kV and 200 kV if they are more than 10 miles long. The 115 kV transmissions line proposed for the Project are less than 10 miles in length. Therefore, a Certificate of Need is not required for the proposed Project. This was stipulated in the Scoping Decision, signed by the Director of the OES on September 3, 2009.

**Comment 27-6**

Thank you for your comment. It has been noted and included in the record for this EIS.

**Commenter 27 – Aisha Gomez**

**Responses**

27-6

103

1 ethical or moral guides are, that we all -- we have  
2 an obligation to protect the most vulnerable among  
3 us and that what the evidence shows is that where  
4 there is a health impact from EMF, it hits kids.  
5 And the kids around here are more exposed to this  
6 because of the issue about health care and other  
7 health impacts that they're suffering under.

8 So thank you.

9 MR. STORM: Donna Nex.

10 MS. NEX: I think I'm going to pass.

11 Everything's been said.

12 MR. STORM: Okay. Well, I'd encourage  
13 you to send in written comments.

14 Before we close, Deb mentioned that one  
15 of the parking lots --

16 MS. PILE: The one behind the market over  
17 there, I guess people that parked there might get  
18 towed. We were just warned of that. I think the  
19 parking lot for this building is actually behind the  
20 church.

21 (Off the record.)

22 MR. STORM: That wraps up the people who  
23 signed up, except for Representative Clark, to  
24 speak. After she's done, I will just ask for a show  
25 of hands of anybody else who would like to speak.

**Commenter 28 – Karen Clark**

1 MS. CLARK: Thank you. I actually  
2 planned some written notes, comments. My name is  
3 Karen Clark. K-A-R-E-N. C-L-A-R-K. And I'm going  
4 to be submitting some written comments, but I don't  
5 want to pass up the chance to at least say a couple  
6 of things here. And I just got here because I was  
7 at a legislative hearing.

8 So I want to say thank you to the people  
9 who have been raising issues that I think are so  
10 critical to this neighborhood. And what I heard  
11 that is especially important that I'd like to ask be  
12 given very strong weight is the environmental  
13 justice impact issues.

14 As was mentioned, this neighborhood has  
15 special protection under state law that no other  
16 neighborhood in the state and I think possibly in  
17 the U.S. has, and that has to do with requiring that  
18 our public health agency, health department, state  
19 health department, and the Minnesota Pollution  
20 Control Agency must evaluate potential cumulative  
21 health impact whenever there is a new source of  
22 pollution or contamination brought into this  
23 Phillips neighborhood. And so I'm actually seeking  
24 an opinion on how that applies. I haven't received  
25 the details of that yet, some preliminary

28-1

**Responses**

**Comment 28-1**

Minnesota House bill 3293 (Senate version 3393) amended Minnesota Statutes 2006, section 116.07, subdivision 4a to require the Minnesota Pollution Control Agency (MPCA) to analyze cumulative pollution effects prior to issuing a permit to a facility located within a geographic area meeting certain conditions. Portions of the Project Area meet the conditions subject to the cumulative pollution effects analysis. However, the EIS was prepared in accordance with the Power Plant Siting Act as part of the route permitting process. Route permits for HVTLs are issued by the Public Utilities Commission, which is not subject to Minnesota Statutes Section 116.07. The statute speaks to permits issued by the MPCA, specifically air emission permits. Potential MPCA permits required for the construction and operation of the Project are limited to those listed in Section 8.0 of the EIS and do not have an air emission component.

**Commenter 28 – Karen Clark**

28-1

1 information. But I do want to say that that is the  
2 crux for me of why this is a very, very important  
3 issue. And many things people said earlier about  
4 that, that this is a community that already suffers  
5 disproportionate impact on environmental toxin  
6 exposures, and the question of health impacts that  
7 could be produced by these transmission lines are  
8 very, very serious ones and need to be fleshed out.  
9 And I hope time will be allowed for that to happen.

28-2

10 I believe there was probably testimony --  
11 I didn't get to hear too much -- alluded to that  
12 there are alternatives to putting these transmission  
13 lines through this neighborhood. They could do a  
14 lot better job of conservation, of alternative  
15 energy. And I just want to reaffirm that.

28-3

16 And one thing that's something I might be  
17 able to do to help that I'll just remind the PUC of  
18 is, as was noted in the newsletter from the Greenway  
19 coalition, right now the state law doesn't require  
20 that you consider the issue that we've been talking  
21 about here tonight because of the distance that is  
22 involved, at least issues that require a certificate  
23 of need, and that law can be changed. In fact, last  
24 year I introduced legislation to do just that. And  
25 I'd really like to invite you to join me with that

**Responses**

**Comment 28-2**

See response to Comment 24-4, which addresses the same concern.

**Comment 28-3**

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 28 – Karen Clark

106

1       legislation, because it will be here. So I don't  
2       suppose that's news to the people that heard that,  
3       but I have not really received any feedback at all  
4       from the Commission.

5                So I will submit more written comments.  
6       But I just want to thank you for having this  
7       process. I understand this room was full earlier,  
8       and that's wonderful and typical of this community.  
9       People care a lot about this community, and I'm  
10      really glad that you came today and to be given the  
11      opportunity for public response.

12             Thank you.

13             MR. STORM: Thank you.

14             That concludes the cards that I had.

15             Is there anyone else who hasn't spoken  
16      who would like to speak? If there are, raise your  
17      hands, and I'll call on you, and we can work through  
18      that.

19             Okay. Seeing none, I'm going to wrap it  
20      up. I do want to remind you that your participation  
21      is important. The goal here is to make the EIS a  
22      better document. You have till March 10th to submit  
23      your comments to me. Either snail mail, e-mail,  
24      fax, or you can comment online and send me a comment  
25      through there.

## Responses

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Again, I appreciate you coming out.

Thank you.

(Proceeding concluded.)

## Commenter 29 – Sybil Axner

**From:** [spache@web.lmic.state.mn.us](mailto:spache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Axner Tue Mar 2 17:46:05 2010 E002/TL-09-38  
**Date:** Tuesday, March 02, 2010 5:46:42 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Sybil Axner

County:

City: Minneapolis

Email: [sybilaxner@earthlink.net](mailto:sybilaxner@earthlink.net)

Phone: 612 724-9542

Impact: I am opposed to the proposed high voltage power lines by Xcel on the Midtown Greenway bike path through the center of south Minneapolis. Burying lines would perhaps be more expensive but would eliminate the risk posed by overhead lines. It seems the power company wants to start small but clearly intends to expand the line throughout the Greenway and increase voltage, as well. That neighborhood already deals with arsenic drift, lead dust & air pollution from the downtown burner -- enough environmental pollution for children and neighbors alike.

Please stop this invasive plan that threatens our community.

Mitigation: Bury the lines.

Submission date: Tue Mar 2 17:46:05 2010

This information has also been entered into a centralized database for future analysis.

29-1

## Responses

### Comment 29-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 30 – Samuel Axner-Engel

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Axner-Engel Tue Mar 2 16:33:15 2010 E002/TL-09-38  
**Date:** Tuesday, March 02, 2010 4:33:40 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Samuel Axner-Engel

County:

City: Minneapolis

Email:

Phone:

30-1

Impact: I am concerned about the health effects of having these power lines in the neighborhood. If there are alternatives that would lessen these effects, they should be considered. Also, where would these lines run from/to? Both lower and higher socioeconomic areas?

30-2

Thank you,

Sam Axner-Engel

Mitigation:

Submission date: Tue Mar 2 16:33:15 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

## Responses

### Comment 30-1

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 30-2

A discussion of the Project Area, including the start and terminus points of the transmission line route alternatives, appears in Sections 1.3 and 1.4 of the EIS.

## Commenter 31 – Wayne Bailey

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Bailey Sun Mar 7 12:08:13 2010 E002/TL-09-38  
**Date:** Sunday, March 07, 2010 12:08:52 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Wayne Bailey

County: Hennepin County

City: Minneapolis

Email: wayneb23@gmail.com

Phone: 612-964-5910

Impact: I've always believed that overhead power lines create fields that are bad for people. I live in the neighborhood and I use the greenway all the time. I love it. Overhead power lines through a populated area are a bad idea.

Mitigation: Put the lines and the substations underground.

Submission date: Sun Mar 7 12:08:13 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

31-1

## Responses

### Comment 31-1

Thank you for your comment. It has been noted and included in the record for this EIS.

Commenter 32 – Pamela Barnard



85 7th Place East, Suite 500, St. Paul, MN 55101-2198  
main: 651.296.4026 tpy: 651.296.2860 fax: 651.297.7891  
www.commerce.state.mn.us

Public Comment Sheet  
DRAFT EIS  
Xcel Energy Hiawatha HVTL Project  
PUC Docket Number: E002/TL-09-38

Name: PAMELA BARNARD Representing: self - fellow neighbors in my community

Address: 2833 37th Ave So  
Mpls 55406  
Email: derishtoqo@gmail.com

Comment:  
As a citizen living a block from the Greenway who uses the bike path to commute to work during summer months and who works in the Phillips neighborhood and has seen firsthand the improvements to the neighborhood with the development of the Greenway and the Midtown Commons, I believe the routing of Overhead lines of 115 kV high voltage would impact negatively the gains that have recently been made. The Phillips neighborhood has suffered greatly over the years as a result of decisions on routing of freeways, the existence of a pesticide

32-1

Please submit comments to meeting moderator or send to:

William Cole Storm  
MDOC  
85 7th Place East  
Suite 500  
St. Paul, MN 55101-2198

Email: bill.storm@state.mn.us  
Voice: 651-296-9535  
Fax: 651-297-7891

Responses

Comment 32-1

Thank you for your comment. It has been noted and included in the record for this EIS.

Commenter 32 – Pamela Barnard



85 7th Place East, Suite 500, St. Paul, MN 55101-2198  
main: 651.296.4026 tty: 651.296.2800 fax: 651.297.7891  
www.commerce.state.mn.us



Comments Continued:

32-1

manufacturing facility, and other developments that have degraded the strength of the community. The Greenway is a gem that is the pride of the City of Mpls and encourages businesses to develop along its route. ~~By~~ Choosing the cheapest and most direct route for this type of power line is short-sighted and lacks the larger vision of ~~for~~ improving life in the metro area that was always a part of the park system into which the Greenway feeds. ~~center~~.

32-2

The Draft Environmental Impact Statement does not weigh these concerns enough against a quick fix to the community and beyond's burgeoning energy usage. More needs to be done to explore and encourage energy savings by businesses and homes drawing on the voltage lines and proposed substation before ~~addition~~ an existing green space of which there are so few in the area is destroyed.

32-3

The DEIS also did not study the impacts of graffiti ~~and~~ and the destruction of extensive landscaping that would occur if the substation and substantial power lines were placed along the Greenway.

Responses

Comment 32-2

Thank you for your comment. It has been noted and included in the record for this EIS.

Comment 32-3

See response to Comment 24-4, which addresses the same concern.

## Commenter 33 – Bonnie Beckel

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Beckel Sun Feb 28 12:30:52 2010 E002/TL-09-38  
**Date:** Sunday, February 28, 2010 12:31:05 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Bonnie Beckel

County: Hennepin County

City: Minneapolis

Email: [jhbb@usiwireless.com](mailto:jhbb@usiwireless.com)

Phone: 612-722-6473

**Impact:** We live in a world where people live in fear of many environmental poisons. I believe what I've heard that above ground high voltage power lines effect our bodies in subtle ways and are linked to childhood leukemia.

A less toxic option exists and it would make a big difference to people if you could hear our concerns and respond to them.

**Mitigation:** Please bury the power lines. This would not only be less harmful to people's health but would also keep our world more beautiful.

Submission date: Sun Feb 28 12:30:52 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick

## Responses

### Comment 33-1

Thank you for your comment. It has been noted and included in the record for this EIS. A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

33-1

## Commenter 34 – Johannah Boemster

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Boemster Sun Mar 7 11:58:22 2010 E002/TL-09-38  
**Date:** Sunday, March 07, 2010 11:58:40 AM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Johannah Boemster

County: Hennepin County

City: Minneapolis

Email: rumihouse@mac.com

Phone:

Impact: Further health risks in an already challenged neighborhood is not OK. My children use this space and I'm very concerned about it.

Mitigation: The best solution is to bury the lines.

Submission date: Sun Mar 7 11:58:22 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

34-1

## Responses

### Comment 34-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 35 – KC Bretzke

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Bretzke Sun Mar 7 11:48:36 2010 E002/TL-09-38  
**Date:** Sunday, March 07, 2010 11:49:03 AM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: KC Bretzke

County: Hennepin County

City: Minneapolis

Email: [kcbretzke@gmail.com](mailto:kcbretzke@gmail.com)

Phone: 612-920-1687

**Impact:** This is a high density neighborhood and I use the greenway on my bicycle.

**Mitigation:** On a practical note, we'll have fewer problems in the future if we bury our lines.

Submission date: Sun Mar 7 11:48:36 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

35-1

## Responses

### Comment 35-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 36 – Don Browne

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Browne Sun Feb 28 12:09:06 2010 E002/TL-09-38  
**Date:** Sunday, February 28, 2010 12:09:29 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Don Browne

County: Hennepin County

City: Minneapolis

Email: [donaldbrowne@hotmail.com](mailto:donaldbrowne@hotmail.com)

Phone:

Impact: I think the power line should be buried. I think it owl be better for the environment and the people.

Mitigation: I think the line should be buried.

Submission date: Sun Feb 28 12:09:06 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

36-1

## Responses

### Comment 36-1

Thank you for your comment. It has been noted and included in the record for this EIS.

Commenter 37 – Lorraine Bryant



85 7th Place East, Suite 500, St. Paul, MN 55101-2198  
main: 651.296.4026 tpy: 651.296.2800 fax: 651.297.7891  
www.commerce.state.mn.us

Public Comment Sheet  
DRAFT EIS  
Xcel Energy Hiawatha HVTL Project  
PUC Docket Number: E002/TL-09-38

Name: LORRAINE BRYANT Representing:

Address: 2929 CHICAGO AV #1013 Email:  
MINNEAPOLIS MN  
55407

Comment:  
IN LIGHT OF INCREASING EVIDENCE OF ADVERSE HEALTH  
CONDITIONS CAUSED BY POWERLINES, IT IS HARD TO  
UNDERSTAND XCEL'S DETERMINATION TO GO AHEAD WITH  
OVERHEAD LINES.  
THE GREENWAY WOULD BE BADLY DEFILED BY THE  
LINES. THEY SHOULD BE UNDERGROUND. XCEL CITES  
LOWER COSTS TO INSTALL OVERHEAD WIRES, BUT  
THEY CAN CAUSE PROBLEMS WHEN WEATHER MAKES  
THEM FAIL. EVEN SQUIRRELS CAN CAUSE OUTAGES.  
FROM A SECURITY STANDPOINT, UNDERGROUND WIRES  
ARE LESS EASILY SABOTAGED.

Please submit comments to meeting moderator or send to: (over)

William Cole Storm Email: bill.storm@state.mn.us  
MDOC Voice: 651-296-9535  
85 7th Place East Fax: 651-297-7891  
Suite 500  
St. Paul, MN 55101-2198

37-1

Responses

Comment 37-1

Thank you for your comment. It has been noted and included in the record for this EIS.

Commenter 37 – Lorraine Bryant



85 7th Place East, Suite 500, St. Paul, MN 55101-2198  
main: 651.296.4026 tty: 651.296.2860 fax: 651.297.7891  
www.commerce.state.mn.us

Comments Continued:

ALSO: THE NOTICE OF THE MEETING THAT WAS  
MAILED TO ME ARRIVED THE DAY BEFORE (9 FEB).  
IF I HADN'T OTHERWISE KNOWN OF IT, I MIGHT NOT  
HAVE BEEN ABLE TO ATTEND. PERHAPS OTHERS  
COULD HAVE COME HAD THEY KNOWN IN ADVANCE.

Lined area for additional comments.

37-2

Responses

Comment 37-2

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 38 – Mary Burns

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** BURNS Sun Feb 28 12:00:37 2010 E002/TL-09-38  
**Date:** Sunday, February 28, 2010 12:00:48 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: MARY E. BURNS

County: Hennepin County

City: MPLS.

Email: NONE

Phone: 612 721 1877

Impact: It's important to me that the lines be underground for the health and welfare of the community.

Mitigation:

Submission date: Sun Feb 28 12:00:37 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

38-1

## Responses

### Comment 38-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 39 – Mandala Catlette

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Catlette Sun Mar 7 12:04:48 2010 E002/TL-09-38  
**Date:** Sunday, March 07, 2010 12:21:26 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Mandala Catlette

County:

City: Minneapolis

Email: [mandalamarie@yahoo.com](mailto:mandalamarie@yahoo.com)

Phone:

Impact: I use the Midtown greenway for commuting and recreation, and I definitely do NOT want to see this transmission line put in. I feel it is a hazard and it is ugly--and currently bikers don't have many dedicated commuter lanes like this one in the city that spans from one end of Minneapolis to the other. I really don't want to see any alterations to the greenway--especially of this nature. Thank you.

Mitigation: I highly suggest you bury these cables instead. That would be a preferable alternative.

Submission date: Sun Mar 7 12:04:48 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

## Responses

### Comment 39-1

Thank you for your comment. It has been noted and included in the record for this EIS.

39-1

## Commenter 40 – Winston Cavert

**From:** [cavert003@UMN.EDU](mailto:cavert003@UMN.EDU)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Hiawatha Project Xcel HVTL line draft EIS  
**Date:** Friday, February 19, 2010 12:39:08 AM

---

Dear Mr. Storm,

I was sorry I was unable to attend the public comment meeting last week on the Xcel Energy Hiawatha HVTL line EIS draft. As a resident of the Seward neighborhood who lives three blocks from the Midtown Greenway, I wish to comment. At present, after years of hard work and devoted planning on the part of many people, the Midtown Greenway is a much used and much beloved green landscape alternative commuting, and recreational asset in a part of Minneapolis that has been previously prone to urban blight. Placing above ground wires would be unsightly and take the Greenway back to a sense of being part of an industrial wasteland. The ill-effect this would have on the "feel" of the Greenway cannot be overstated -- it would be a disaster. In addition, the Hiawatha substation would consume what is now a lovely area of urban greenery in a part of the city that needs more, not less, areas of beauty and greenscaping. Please include these perspectives in your EIS.

Sincerely,  
Winston Cavert, MD

40-1

## Responses

### Comment 40-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works



Community Planning &  
Economic Development  
250 South 4<sup>th</sup> Street, Room 110  
Minneapolis, MN 55415

Department of Public Works  
Room 203, City  
Hall/Courthouse  
350 South 5th Street  
Minneapolis, MN 55415

March 5, 2010

William Cole Storm  
State Planning Director  
Department of Commerce  
Office of Energy Security  
85 7th Place East  
Suite 500  
St. Paul, MN 55101-2198

Mr. Storm:

The City of Minneapolis appreciates the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the proposed *Xcel Energy Hiawatha 115 kV Transmission Line Project*. Our comments are categorized in three ways: a) general statements regarding the analysis; b) concerns regarding content in the DEIS, and c) recommendations for additional study, consideration or revision.

Overall, the DEIS does a good job of capturing and describing the land use, historic and cultural features and economic development and housing elements of the proposed project area. The essence of the project area is appropriately portrayed from the following perspectives:

- Recognizing the importance of alternative transportation, increasing housing density, future amenities, urban reinvestment, and the impacts of the route and substation alternatives on all of these.
- Correctly identifying overhead transmission lines and poles as industrial uses that are incompatible with City Council-adopted land use plans.
- Correctly identifying future greenway-related infrastructure including transit stations, pedestrian promenades, and 29<sup>th</sup> Street improvements as important future investments that should be considered when routing transmission lines and siting/designing substations.

Efforts should be taken to preserve the essence and potential of this project area defined in adopted City policy as:

*"...distinctive in its proximity to exciting and convenient commercial districts, in the availability of outstanding transportation options, and in the presence of the Midtown Greenway amenity itself. Over time it will grow as a place where the natural and built environments work together, where mixed-use development patterns of varying intensity are complemented by open space and traditional urban neighborhoods. New private development, and enhancement of the public landscape, will add to its commercial, residential and recreational assets, and strengthen its sustainability and connectedness."*

The Midtown Greenway area is increasingly taking on characteristics of a downtown area: High load density; fully developed area; concentration of large regionally-significant employers and related commercial development and adjacent residential development including increasing levels of mixed-use and multifamily dwellings, such as condominiums. This area is also relatively close to the existing downtown boundaries.



www.ci.minneapolis.mn.us  
Affirmative Action Employer

## Responses

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 2 of 12

- 41-1 While installing transmission lines underground is not the Applicant's preferred construction method because of cost and complexity, undergrounding of transmission lines would mitigate or eliminate nearly all long term adverse environmental effects. Pursuant to Minnesota Rules, Part 7850.1100: "The Commission shall choose locations that minimize adverse human and environmental impact while ensuring continuing electric power system reliability and integrity and ensuring that electric energy needs are met and fulfilled in an orderly and timely fashion." Comparing this area with the other 12 miles of underground facilities that Xcel currently owns appears warranted and would answer the question of whether the urban parameter in the Midtown area is similar to or greater than their other underground facilities.
- Concerns
- 41-2 The various simulated "views" of the proposed transmission line are marginal representations. The angles and distances understate the real visual impact. A few of the simulated views related to the alternative routes provide some scale of the transmission structure relative to adjacent buildings but not for the proposed Route A.
- 41-3 Throughout the DEIS, several references are made to the finding that "The transmission lines and substations are compatible with current and future industrial land use." This is not an accurate summary of the findings related to future land use that are explored with more depth and nuance in Section 5.2 (Land Use, Zoning and Planning). That section carefully explains that while the presence of transmission facilities would not directly preclude new development, indirect visual effects of overhead transmission lines could affect the scale of new development or discourage it altogether. The summary of this finding, when referenced in other parts of the DEIS, should acknowledge the potential impacts to future development explained in Section 5.2.
- 41-4 *P. 52*  
Cost tables and related text refer to the incremental cost of undergrounding and the tables listing out the various surcharges calculated; it would seem reasonable that as a frame of reference there be discussion as to the method of cost recovery currently being used to pay for the existing 12 miles of underground transmission lines of the Applicant. We are unclear of whether the cost of undergrounding distribution lines along Route A Overhead (or any of the overhead routes) is included in Table 1-2: Project Costs.
- 41-5 *P. 73*  
Substation design should take into account not just security but also urban design and form. Substations surrounded by fencing and barbed wired and screening walls may offer some level of deterrent for taggers but are not consistent with adjacent uses in terms of visual impact or scale. The most secure option would be fully enclosed substations. The design should be consistent with the urban, populated environment upon which the project is imposing. Alternative substation designs should be presented to demonstrate how physical footprints can be minimized. Efforts to offset the need for substation expansion, including conservation measures, should be taken to reduce potential impacts on adjacent land uses and future development objectives.
- 41-6 *P. 77*  
Is the design for securing transmission poles for single circuit overhead lines as proposed for alternate routes B and C adequate in terms of structural integrity in the urban environment?
- 41-7 *P. 107-124*  
Of the alternative line configurations presented within the DEIS, clearly the underground routes that are detailed within the document would allow for an alignment and impact on the surrounding built urban environment most consistent with adopted City policies and plans including those within *The Minneapolis Plan for Sustainable Growth* as well as associated neighborhood and area wide plans.

## Responses

### Comment 41-1

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 41-2

Simulated views are included in Figures 5.8-3 through 5.8-21. The views from angles and distances represented are to scale.

### Comment 41-3

The EIS notes that while the Project is not incompatible with land use designations, the development of the Project may have indirect effects on land use due to perceptions of the Project as a visual intrusion or a health and safety concern. Text in Section 5.4 has been modified to include potential impacts to future land development.

### Comment 41-4

The issues of need, including size, type and timing; questions of alternative system configurations; or questions of voltage, were identified to be outside the scope of the EIS in the Scoping Decision, signed by the Director of the OES on September 3, 2009.

### Comment 41-5

A discussion of the potential visual impacts of the substations appears in Section 5.8.2.2 of the EIS. Text throughout the EIS has been modified to note the Applicant's proposed design change for the substation walls, which no longer includes chain link fencing.

### Comment 41-6

A discussion of the design of overhead transmission pole foundations appears in Section 4.1.1 of the EIS. All structures would be designed to meet NESC and NERC standards.

### Comment 41-7

Thank you for your comment. It has been noted and included in the record for this EIS.

## Committer 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 3 of 12

- 41-7 | Should an above-ground alternative be selected, all mitigation efforts would need to be substantially increased versus those of a preferred underground alternative. An above-ground line could not be adequately mitigated due to the surrounding context of the urban environment within this location.
- 41-8 | *P. 85, 242*  
The consideration of the fall zone is important from community safety and community and economic development perspectives. The “fall distance” impacts appear to be based on an assessment of the impact of a falling transmission tower. This does not factor in that the lines connected to the tower will potentially impact buildings as they fall. Also, it is not uncommon for adjacent towers to topple when one does, commonly called cascading. Dead end structures are designed to stop cascading but are only put periodically since they are more expensive.
- Unless there is a rationale or constraint otherwise, Table 5.1-1, should be revised to reflect the impact of the transmission conductor also falling. If the assumption is that the structure and the conductor will fall and if one structure falls it is likely that an adjacent structure will also fall (unless it is a dead end structure), the buildings impacted will be significantly higher. Using Table 5.4-4 since it already contains the number of dwellings within certain distances, the impacts appear to be an order of magnitude greater than indicated on Table 5.1-1.
- The EIS should identify for each route the distance of the closest building and provide some comparison relative to similar metro area lines on an impact per mile basis. Some distinction should be made in this comparison between when the transmission line as originally built and subsequent development after the line was built.
- Since the proposed and alternative routes are adjacent to a significant number of residential properties, in addition to the number of buildings/dwellings impacted there should be an estimate of the number of households, since there may be significant multi-family buildings adjacent to the each of the routes.
- Recommendations
- The following are recommended clarifications and corrections to information conveyed in the DEIS. Please consider making these changes in the Final EIS.
- 41-9 | The Phillips Neighborhood referred to in the report is actually comprised of four neighborhoods with discrete boundaries and separate neighborhood organizations: Phillips West, Midtown Phillips, East Phillips, and Ventura Village. The neighborhood map (Figure 5.4-1) displays this accurately, but the text does not.
- 41-10 | *P. 95-96*  
The City does not have a land use category entitled “agriculture” thus Table 5.2.3 is misleading. We are also unclear how the category “undeveloped” was aggregated.
- 41-11 | *P. 111*  
The DEIS states that “The Employment Districts established by the City Council are used as a zoning framework. The Minneapolis Department of Community Planning and Economic Development – Planning Division’s recommendations do not reveal any financial support for the establishment or maintenance of these types of districts.”
- In fact, the City of Minneapolis has very actively invested in industrial redevelopment in industrial employment districts. Within the Seward South area alone, the City was instrumental in assembling and cleaning former rail yards to facilitate redevelopment. On one redevelopment site alone, the Crew2 site at 2650 Minnehaha, the City invested over \$1.569 million and hundreds of hours of staff time in acquisition and environmental remediation and recouped only the market value sale price of \$583,000.

## Responses

### Comment 41-8

Information on the estimated number of dwelling units near the transmission line alignments appears in Table 5.4-5 of the EIS. Information on the total population within the vicinity of the transmission line alignments appears in Table 5.4-2.

### Comment 41-9

Text in Sections 5.2, 5.4.1, and 5.5.1.1 has been edited to correctly identify the Phillips community as four neighborhoods.

### Comment 41-10

Text has been added to Table 5.2-3 to indicate that the land use classifications were derived from Metropolitan Council data (2007). A note for the table indicates that “agricultural” is not a category used by the City of Minneapolis. A definition of “undeveloped,” as provided by the Metropolitan Council, has been added to the table.

### Comment 41-11

Text in Section 5.2.1.3 has been supplemented to include information on the City’s investment in redevelopment.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 4 of 12

- 41-11 For that single site alone, the City has \$945,000 in sunk costs into the redevelopment with the objective of job creation and tax base growth. The City has made similar investments in several other properties just within this single industrial employment district. A conservative estimate of the amount invested by the City in industrial development in Seward South in the past 15 years would be \$50 million including direct City investment and City development financing, plus thousands of hours of staff time.
- In addition to Crew2, we offer several other examples of business expansions supported by the City. In the Seward Hiawatha Employment District include financing for the expansion of Siewert Cabinet and Fixture Manufacturing which received revenue bond financing and a 2% loan to supports expansion of its physical plant and upgrade rolling stock, New French Bakery and 7-Sigma, Inc. which received revenue bond and business development loan financing for new manufacturing facilities. In addition, small business loans to business and neighborhood-serving enterprises are numerous in the proposed project area. Some of this financing is provided in partnership with the African Development Corporation (ADC) for businesses like the Hiawatha Halal Pizzeria. These businesses receive loans through the Alternative Business Loan Program, a partnership between CPED and the ADC. Alternative Financing Program as being in accordance with Islamic law, or Sharia. The program started in 2007, providing 38 loans to small businesses, many of them start-ups and woman-owned, with the City providing \$646,000 in funds with ADC and other community lenders providing another \$816,000.
- 41-12 *P. 115*  
While it is true that the City Council has yet to approve the Midtown Greenway Rezoning Study, it is likely that it will do so prior to release of the FEIS.
- 41-13 According to the DEIS, one of the stated goals of the Midtown Greenway Rezoning Study is to "ensure...that industrial uses are not located within or along the Greenway". A more accurate statement would be to "ensure...that *new* industrial uses are not located within or along the Greenway in places where adopted policy calls for new housing."
- 41-14 *P. 122*  
A discussion of "other small area plans" should include the Franklin-Cedar/Riverside Transit Oriented Development Master Plan (<http://www.ci.minneapolis.mn.us/citywork/light-rail/franklin-masterplan/index.html>).
- 41-15 The DEIS states that the eastern terminus of the Uptown Small Area Plan is "Calhoun Avenue." The correct eastern terminus is Bryant Avenue South.
- 41-16 "Lyn-Lake Small Area Plan" is misspelled.
- 41-17 *P. 125*  
It should be noted that areas of Minneapolis were designated as Empowerment Zones by the department of Housing and Urban Development (HUD), not the City of Minneapolis. This was a 10-year program that expired at the end of 2009, but expenditures will continue through 2010. From 2004 through 2009, over 2,000 jobs were created in this Empowerment Zone. More information: <http://www.ci.minneapolis.mn.us/ez/>
- 41-18 *P. 132*  
Regarding the potential removal of a business for the Hiawatha East Substation location, the DEIS states that "the loss of use would not impact the overall land use or zoning designation..." It should be noted that the comprehensive plan designates that area as an Industrial Employment District, and that removal of a business or the use of land that precludes job generation within an Industrial Employment District is in direct conflict with policies of the comprehensive plan.

## Responses

### Comment 41-12

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 41-13

Text in Section 5.2.1.3 under the Midtown Greenway Rezoning Study subsection has been supplemented to incorporate the suggested text.

### Comment 41-14

Text in Section 5.2.1.3 under the Other Small Area Plans subsection has been supplemented to include information on the Franklin Cedar Riverside Transit Oriented Development Master Plan.

### Comment 41-15

Text in Section 5.2.1.3 has been edited to note the correct street name.

### Comment 41-16

Text has been edited in Section 5.2.1.3 to correct the noted grammatical error.

### Comment 41-17

Text in Section 5.2.2.1 has been supplemented to include additional information about the Department of Housing and Urban Development's empowerment zones.

### Comment 41-18

Text in Section 5.2.2.2 has been modified to reflect that a loss of land use at the Hiawatha East Substation location would be incompatible with existing comprehensive plans.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 5 of 12

- 41-19** | *P. 133*  
The DEIS states that chain-link fences at the Midtown substation sites would be consistent with the overall industrial area. This statement is inconsistent with the general direction of the Midtown Greenway Land Use and Development Plan and the Midtown Minneapolis Land Use and Development Plan, which envision a transition toward residential development along the Midtown Greenway rather than new industrial uses. This transition is accurately described elsewhere in the DEIS.
- 41-20** | *P. 133 & 385*  
Based on the City's lack of regulatory authority, what assurances pertaining to the design of the substations and additional mitigating efforts (landscaping, fencing, etc., contributing to visual relief) would the City have input on in the future? Will the City be able to review, comment and provide suggestions on the designs of the proposed substations (architectural elements, materials, wall details, etc., provided they are both above-ground facilities) landscape plantings, fencing details (no barbed wire), etc., as part of the official mitigation plan?
- 41-21** | Due to the visibility and prominence of the locations of proposed substations (provided they are constructed above-ground), the City believes that the designs of these structures are critical in order to limit intrusive/adverse impacts on current and future adjacent land uses. The mitigation plan should outline what steps will be taken to ensure that the City is satisfied with the building design and details minimizing impacts to the community to the extent reasonably possible as determined after consultation with the City and the adjoining communities.
- 41-22** | *P. 136*  
In terms of local designation, Section 5.3 does not properly recognize the City of Minneapolis local heritage preservation designations. The report does not recognize the Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District as eligible for local designation. Section 5.3 (page 136): Criteria 3 for local designation is not correct. City of Minneapolis local designation Criteria 3 should read as follows: "The property contains or is associated with distinctive elements of city or neighborhood identity." Additional historical analysis should be completed for the DEIS to assess the impact of large transmission towers of the proposed routes on the impacted areas and how the transmission lines would impact the significance and integrity of the impacted areas. In particular, the DEIS should analyze how the proposals would impact the impacted areas based on local designation Criteria 3 and 5:
1. Criteria 3: The property contains or is associated with distinctive elements of city or neighborhood identity.
  2. Criteria 5: The property exemplifies a landscape design or development pattern distinguished by innovation, rarity, uniqueness of quality of design or detail.
- In addition, historic resources in Central, Whittier, and Phillips neighborhoods on or near the proposed routes for the large transmission lines have likely not been completely recognized. The 2001 Cultural Resources Study highlighted in the DEIS surveyed Powderhorn Park, Central, Whittier, and Phillips Neighborhood. However, the 2001 study only provided specific recommendations for designation for Powderhorn Park. No designation recommendations were completed for Central, Whittier, and Phillips neighborhoods in this report. Impacts to historic resources in these neighborhoods should be subject to further historic analysis.
- 41-23** | Further, the archeological impact of the Pioneers and Soldiers Cemetery is not addressed in the DEIS (5.3.1.5). A potter's field is located in the northeastern part of the cemetery, which is near the proposed location of the power lines (National Register Nomination form.). The extent of human-remain movement in the cemetery and potter's field over the past 150 plus years is unknown. (National Register Nomination Form.)

## Responses

### Comment 41-19

The sentence regarding consistency of the design of the Midtown Substation with existing land use plans has been removed from Section 5.2.3 of the EIS.

### Comment 41-20

The HVTL route permit issued by the Public Utilities Commission could include detailed permit conditions and mitigation, including special conditions for the design and landscape of the substations and governmental units or other organizations to be included in the design. Permit conditions would be determine through review of the EIS, public comments on the DEIS, and testimony from the contested case hearing.

### Comment 41-21

See response to Comment 41-20, which addresses the same concern.

### Comment 41-22

Text in Section 5.3 has been supplemented to include information on the duties of the HPC and their role in local preservation activities. Text in Section 5.3.1.4 has been supplemented to include information on the eligibility of the CM&StP Railroad Grade Separation Historic District under local designation. Additionally, text in Section 5.3 has been supplemented to include information on local designation criteria. A search for and description of NRHP listed, NRHP eligible, and 800 list properties was conducted for Routes A, B, C, D, and E2, and is presented in Table 5.3-1 of the EIS. This information was used to identify potential impacts and compare route alternatives in the EIS. The 2001 study was used to supplement this information, as it was readily available. A pedestrian level study and evaluation of properties under local designation criteria could be required by the PUC as a permit condition and considered during structure placement. A field study for Route A was conducted in March 2010. Information from this study was included throughout Section 5.3, as appropriate.

### Comment 41-23

Text in Section 5.3.2.1 has been supplemented with information from a 2010 Cultural Study conducted in the Project Area.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 6 of 12

41-24

P. 143 & 144

Section 5.3.1.3 of the DEIS does not properly highlight the City of Minneapolis heritage preservation policies that aim to protect cultural landscapes such as the Chicago Milwaukee and St. Paul Grade Separation Historic District. The DEIS only states that cultural landscapes are “encouraged through the maintenance of street trees and other natural elements (p 144).” The City of Minneapolis comprehensive plan has established numerous policies to protect cultural landscapes, such as the Chicago Milwaukee and St. Paul Grade Separation Historic District. These policies include the following:

Policy 8.1: Preserve, maintain, and designate districts, landmarks, and historic resources which serve as reminders of the city's architecture, history, and culture.

- 8.1.1 Protect historic resources from modifications that are not sensitive to their historic significance.
- Policy 8.1.2 Require new construction in historic districts to be compatible with the historic fabric.
- 8.1.3 Encourage new developments to retain historic resources, including landscapes, incorporating them into new development rather than removal.
- 8.1.4 Designate resources recommended for designation from historic surveys and listed on the National Register of Historic Places which have no local protection.
- Policy 8.5: Recognize and preserve the important influence of landscape on the cultural identity of Minneapolis.
- 8.5.1 Identify and protect important historic and cultural landscapes.
- 8.5.2 Encourage planting and maintenance of street trees and other natural elements in historic districts to promote livability.
- 8.5.3 Preserve historic materials typically found in public spaces, such as street materials like pavers, lighting and other resources.

The City of Minneapolis Comprehensive Plan calls out the Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District as an important site to protect:

*“In addition to preserving the recent past, resources once considered unimportant, are being hailed as contributing to our city's significant history. The Midtown Greenway (historically known as the Chicago, Milwaukee and St. Paul Railroad Grade Separation), an abandoned railroad trench, has experienced a rebirth as a bike and pedestrian corridor and is now on the National Register of Historic Places (City of Minneapolis Comprehensive Plan (page 8-4)).*

41-25

P. 144-146

Section 5.3.1.4 regarding the Midtown Greenway Trench provides minimal historic information for the Chicago Milwaukee and St. Paul Grade Separation Historic District. The following information from the 2005 National Register designation form that highlights its cultural landscape and historic community planning significance should be included:

*“Chicago Milwaukee and St. Paul grade separation project on their H and D line was carried out between 1912 and 1916 and represents the culmination of efforts by the citizens, city government, and city planners of Minneapolis to direct the future growth and appearance of south Minneapolis while ensuring the safety of its residents and maintaining economically necessary industrial interests. As the residential areas of the city began to expand in the late nineteenth and early twentieth centuries, movement between residence and workplace would become perilous due to the presence of the previously constructed H and D line through south Minneapolis. An immediate solution to the grade crossings problem for the sake of safety, however, was forgone due to the desire of residents and officials to guide city planning in an appropriate and attractive direction. The debate over the form of the grade separation, therefore, extended over several years. That the importance of the resolution of this debate lay in the areas of city planning and urban*

## Responses

### Comment 41-24

Text in Section 5.3.1.3 has been supplemented to include information on Policies 8.1 and 8.5 from the City of Minneapolis comprehensive plan. Text in Section 5.3.1.4 was supplemented to include the provided text from the comprehensive plan regarding the CM&StP Grade Separation.

### Comment 41-25

Text in Section 5.3.1.4 has been supplement to include the information on the CM&StP Grade provided in the comment.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 7 of 12

41-25

*aesthetics is indicated by the creation of the Civic Commission of Minneapolis during the period of the debate, one of whose main goals was to address grade separation in the context of a comprehensive civic plan; the hiring of Edward H. Bennett, a leader of the City Beautiful Movement, to preside over this commission and design the civic plan; and the final design of the H and D line grade separation project, approved by the City Council and the Civic Commission, as a depressed rail corridor with ornamental bridges. For these reasons, the CM and StP Grade Separation Historic District in Minneapolis is eligible for the National Register of Historic Places under Criterion A for its local significance in the area of community planning and development (National Register Designation Form, 2005)."*

*"From 1909 through December of 1910, the decision of how to handle the grade crossings situation became the foremost issue facing the Council. Despite the concerns for public safety, the decision had been delayed since 1905 when the original plan for elevation was rejected on aesthetic grounds. This delay was due largely to the importance of the resolution of the grade crossings issue in determining the future appearance and development of the city, and these concerns, in turn, were due largely to the influence of the City Beautiful movement. The City Beautiful movement was spawned by the "White City," which was built for the World's Columbian Exhibition of 1893 and served as a model for harmonious and unified urban aesthetics (National Register Designation Form, 2005)."*

41-26

P. 151-152

The DEIS does not include the National Register Chicago, Milwaukee, and St. Paul Grade Separation Historic District maps which shows the district boundary and the contributing elements. (See Appendix C).

Regarding the Chicago Milwaukee and St. Paul Railroad Grade Separation: 5.3.2.1 Transmission Line Route Alternatives: The Chicago Milwaukee and St. Paul (CM&StP) Grade Separation Historic District is listed on the National Register and is eligible for local designation. The district is significant for its cultural landscape and for its historic community planning and development efforts (Criterion A). The power line placement that is proposed for Route A (aboveground) would have a substantially adverse impact on the Chicago Milwaukee and St. Paul Grade Separation Historic District. In 1910, The Chicago Milwaukee and St. Paul Grade Separation Historic District with the ornate bridges and depressed grade was agreed upon in design by citizens, city government, and city planners based in large part because of its aesthetics and design that blended in within the surrounding area. The depressed grade was a more attractive option compared to an above ground rail line or at grade.

*"The debate over the form of the grade separation, therefore, extended over several years. That the importance of the resolution of this debate lay in the areas of city planning and urban aesthetics is indicated by the creation of the Civic Commission of Minneapolis during the period of the debate, one of whose main goals was to address grade separation in the context of a comprehensive civic plan; the hiring of Edward H. Bennett, a leader of the City Beautiful Movement, to preside over this commission and design the civic plan; and the final design of the H and D line grade separation project, approved by the City Council and the Civic Commission, as a depressed rail corridor with ornamental bridges. For these reasons, the CM and StP Grade Separation Historic District in Minneapolis is eligible for the National Register of Historic Places under Criterion A for its local significance in the area of community planning and development (National Register Designation Form, 2005)."*

The large transmission lines (between 75-100 feet in height) would be a large visual addition that would not be consistent with the historic district.

## Responses

### Comment 41-26

Text in Section 5.3.2.1 has been modified to include information on the CM&StP Grade provided in the comment.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 8 of 12

- 41-26 | The aforementioned information is in contrast to the following DEIS combined sentences: "In general, the neighborhoods intersected by the alignment of Route A are characterized by industrial and transportation associations. Therefore, the proposed large transmission towers near the CM&StP Railroad Grade Separation are not entirely out of character."
- 41-27 | *P. 155*  
Section 5.3.2.2 states that most of the rail facilities within this area [of the Hiawatha Substation Sites], such as the Chicago Milwaukee and St. Paul rail yards, have been removed. As a result, these sites do not appear to contain historic properties or to be proximate to historically significant properties (page 155). This statement is incorrect and/or incomplete. The 2002 Hiawatha Light Rail Transit (LRT) Memorandum of Agreement identifies an area that extends from Franklin Avenue on the north, Lake Street on the south, Hiawatha on the west and Minnehaha Avenue/26<sup>th</sup> Avenue on the east as a potential historic site (see Appendix A). This area is known to have contained the Chicago Milwaukee and St. Paul and Pacific Railyard Car Shop (roundhouse) and the Chicago Milwaukee and St. Paul Pacific Railyard Freight Yards.
- 41-28 | The location of the proposed substation at Mt-28N is a historic resource. The site north of 28<sup>th</sup> Street is a water-park garden designed by world renowned, master landscape architect M. Paul Friedberg in the 1970's. The park, which has similar design elements to Peavey Plaza (11<sup>th</sup> and Nicollet), was renovated in 2005. The water park likely retains its historic integrity and is eligible for local designation under Criteria 5:  
*"The property exemplifies a landscape design or development pattern distinguished by innovation, rarity, uniqueness or quality of design or detail,"* and Criteria 6: *The property exemplifies works of master builders, engineers, designers, artists, craftsmen or architects.* In addition, although the site has not met the 50 year threshold for National Register listing, the water park is likely a good candidate for listing on the National Register under Criterion C: *"Embody the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or possesses high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction."*
- 41-29 | *P. 170*  
Growth and reinvestment in the Midtown Greenway corridor has been significant and sizable. From 2000-2009 a total of 272 building permits for non-residential projects valued at over \$382 million were issued. Significant examples include: a) the permit value for the Midtown Exchange and related developments from 2004-2005 is \$147 million, b) the Abbott Northwestern expansion that took place from 2002-2004 had a permit value of \$105.1 million, and c) the permit value for the Wells Fargo campus from 2001-2003 was \$29 million. These projects are the result of intentional land use decisions that created the conditions for market growth and development. Using data from 2000 fails to capture the economic value of these private sector investments in our community. Current data suggests that the Midtown Greenway corridor is more like Downtown Minneapolis in its economic impact than a suburban community. This distinction has significant implications to the costing and routing of the proposed project.
- 41-30 | *P. 176*  
In terms of analyzing or deducing impacts to residential property values, the most useful comparison would be with other fully-developed communities. Comparisons with suburban communities like Maple Grove, while interesting, may not be comparable since these are designated as "developing communities" rather than "fully-development communities" by Metropolitan Council.
- 41-31 | Since 2004, 1,007 new housing units have been built in nine development projects on property fronting the Midtown Greenway. Of those, 419 units in four development projects are within the proposed project area. The most significant redevelopment in terms of housing unit numbers was the Midtown

## Responses

### Comment 41-27

Text in Section 5.3.2.2 has been modified to note that there may be historic properties within the area of the Hiawatha West Substation.

### Comment 41-28

The proposed Mt-28N substation location is not currently listed on the NRHP or the 800 list, which are used to identify historic properties. Text in Section 5.3.2.2 has been modified to note the potential presence of historic sites that have not yet been evaluated. Text throughout the EIS has been modified and supplemented to include the information on the Mt-28N Substation site provided by Wells Fargo.

### Comment 41-29

Text in Section 5.4.1.1 has been supplemented to include information provided within the comment on the number of building permits and investments near the Midtown Greenway. The most complete data set available for the Project Area is from 2000. This data was used in the EIS to ensure consistency in the level of analysis for socioeconomic. Where more recent information was available, the text was supplemented to discuss the data.

### Comment 41-30

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 41-31

Text in Section 5.4.1.1 has been supplemented to include information on the housing units noted in the comment.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 9 of 12

- 41-31 | Exchange, which includes 357 new units in the renovated Sears building as well as new construction lining a parking ramp across the street.
- 41-32 | *P. 191*  
Under “Development Opportunities,” there is a statement that reads “Planned and proposed development would not be limited or prevented as a result of this Project. However, individuals may choose to alter their development plans based on the visual intrusion and negative perception associated with the presence of transmission lines and substations.” This statement would be more effective and accurate if it matched the related text in section 5.2 (P. 126) that reads “*The transmission line routes would not limit or prevent additional residential development or higher density development, especially along the Midtown Greenway, as suggested by the goals of the various plans. However, the transmission line route alternatives, when built as overhead lines, would create visual intrusions that may discourage this type of development.*”
- 41-33 | This section also makes the assertion that the project would have no direct effects to industrial property values. Without an economic impact analysis or market study this assertion cannot be made.
- 41-34 | *P. 209-234*  
This section of the analysis relates to socioeconomic statistics, social justice and impacts to displacement of homes and business, and economic and employment impacts as well as impacts to subsistence. The section lists a variety of data but does not analyze that data in relation to Presidential Executive Order 12898 which lists three major principles of environmental justice: 1) Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations, 2) Ensure the full and fair participation by all potentially affected communities in the decision-making process, and 3) Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations. This section also lists the many community gardens in this area of the city. Residents utilize these gardens for a variety of purposes, including supplementing their food supply. These provide a community benefit that may be intangible, but is significant not only to community livability but overall city sustainability. Additional analysis of the social and environmental justice impacts is warranted.
- 41-35 | *P. 210 & 213*  
The reference to the Longfellow neighborhood when discussing alternative routes is inconsistent. The neighborhood is located at the eastern end of the project area, not the western end. There are a few instances where there is reference to the Longfellow neighborhood to be on the “western” end of the line rather than the “eastern” end of the line; p 210 (discussion of Route A), and p 213 (discussion of Route B)
- 41-36 | *P. 242*  
This section only refers to vandalism and theft. With increasing concern over vulnerability of critical infrastructure to terroristic attacks, the discussion on security should be expanded. Mitigation, prevention, containment and response should be identified beyond the protective devices that will isolate lines as discussed in the DEIS.
- 41-37 | *Fig. 242*  
The “fall distance” impacts appear to be based on an assessment of the impact of a falling transmission tower. This does not factor in that the lines connected to the tower will potentially impact buildings as they fall. Also, it is not uncommon for cascading; the toppling of one tower causing adjacent towers to fall. Dead end structures are designed to stop cascading but are only placed periodically along a transmission or distribution route due to costs.

## Responses

### Comment 41-32

Text in Section 5.4.2.2 has been modified to incorporate findings presented in Section 5.2.

### Comment 41-33

A discussion of the indirect impacts on property values associated with an overhead HVTL appears in Section 5.4.2.2 of the EIS.

While the overhead transmission line options may have an indirect impact on development due to the lack of desire to live, work, or develop property near a high voltage transmission line, these are not considered direct effects. There are areas within the Twin Cities metropolitan area where development does occur adjacent to overhead high voltage transmission lines.

### Comment 41-34

Environmental justice was identified as a concern during the scoping process and evaluated in the EIS using the federal construct established in Executive Order 12898 as a guide. The federal construct was used for guidance purposes only; the Project is not a federal project and not subject to a NEPA review or Executive Order 12898.

### Comment 41-35

Text in Section 5.5.2.1 has been modified to note the correct location of the Longfellow neighborhood.

### Comment 41-36

Text in Sections 5.6.1.8, 5.6.2.8, and 5.6.3.8 has been modified and supplemented to include information on the potential effect and mitigation of terrorism on utility infrastructure.

### Comment 41-37

A discussion of the number of dwellings and the total population located within 500 feet of the feasible alternative of each route alternative appear in Table 5.4-5 and Table 5.4-2 of the EIS, respectively. Text in Section 5.4.1.1 has been modified and supplemented with information regarding the distance of dwellings to the transmission line conductor.

## Committer 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 10 of 12

- 41-37 Unless there is a rationale or constraint otherwise, Table 5.1-1, should be revised to reflect the impact of the transmission conductor also falling. If the assumption is that the structure and the conductor will fall and if one structure falls it is likely that an adjacent structure will also fall (unless it is a dead end structure), the buildings impacted will be significantly higher. Using Table 5.4-4 since it already contains the number of dwellings within certain distances, the impacts appear to be an order of magnitude greater than indicated on Table 5.1-1.
- The EIS should identify for each route the distance of the closest building and provide some comparison relative to similar metro area lines on an impact per mile basis. Some distinction should be made in this comparison between when the transmission line was originally built and subsequent development after the line was built.
  - Since the proposed and alternative routes are adjacent to a significant amount of residential properties, in addition to the number of buildings/dwellings impacted there should be an estimate of the number of households, since there may be significant multi-family buildings adjacent to the each of the routes.
- 41-38 *P. 257*  
The City of Minneapolis has recent experience with severe storms damaging structures and uprooting trees. In terms of severe weather conditions, and given that transmission structures are long lived assets, 30-40 years, the failures Xcel has experienced over the last 5 years is not very comprehensive. Does the applicant have information on transmission tower failures, steel and wood, for the last 15-20 years for Xcel and for the region (115kV and above)?
- 41-39 *P. 283*  
The analysis of underground transmission is unclear. Why does the Applicant want to minimize encroachment into the street by locating the duct banks located under sidewalks and boulevards? The roadway along route D is relatively free of utilities along the north side. Removal of trees and other vegetation could be avoided if duct banks were located under the roadway. In addition, analysis of an alternative duct bank design that minimizes the footprint in the trench, perhaps one duct bank with more ducts or minimizing the distance between duct banks should be conducted to clarify and complete analysis of underground transmission.
- 41-40 *P. 297*  
It appears that the reference to Hiawatha West Substation contains an erroneous reference to a Midtown West Substation. This should be corrected.
- 41-41 *P. 348*  
Regarding existing transmission lines, fiber optic lines and pipelines (5.15.1.2) the document does not reference the correct utility owner. For example, Reliant Energy should be CenterPoint Energy for natural gas and Time Warner should be Comcast for cable television. WorldCom and Williams are not the current owners of the fiber optic cable. Further the section on telecommunications ignores the Minneapolis Wireless Network. Impacts to this telecommunications infrastructure should be identified and addressed.
- 41-42 The analysis also excludes consideration of existing water and sewer utilities. This can be important in assessing any utility relocations. Utility relocations can be costly and have potential environmental impacts. A more comprehensive comparison of utility relocations for each route should be discussed. We are concerned that the analysis also excludes consideration of private utilities. Section 5.15.1.2 appears incomplete.
- 41-43 *P. 366*  
Regarding Section 5.16.2.1, Route D from 28<sup>th</sup> Street from Hiawatha Avenue to Oakland Avenue: Disruption to the sidewalk on the side of the street where the duct bank is located would be minimized if duct bank were located under the roadway instead of the boulevard as proposed by applicant.

## Responses

### Comment 41-38

A discussion of the ability of a transmission line to withstand severe weather appears in Sections 5.6.2.9 and 5.6.3.9 of the EIS. Transmission line pole structures would be designed to NESC, NERC, and internal Xcel design standards.

### Comment 41-39

The Applicant's preferred alignment for Route D would be beneath sidewalks and boulevards along E 28<sup>th</sup> Street. However, the alignment for Route D could potentially be located anywhere within the route width, including beneath the center of E 28<sup>th</sup> Street.

### Comment 41-40

Text has been edited in Section 5.8.2.2 to correct the noted error.

### Comment 41-41

Text has been edited in Section 5.15.1.2 to correct the noted error. Text in Sections 5.15.1.2 and 5.15.2.1 have been modified to include information on the Minneapolis Wireless Network. Potential impacts to wireless internet infrastructure are consistent with those described for communication networks and omnidirectional signals in Section 5.15.2.1.

### Comment 41-42

Relocation of private utilities may be required for any of the substation or route alternatives. The presence of private utilities would be confirmed after a route and substation locations are selected. Relocation costs would depend on the infrastructure present.

### Comment 41-43

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 11 of 12

- 41-43** | Driveway and alley openings, retaining walls, fences hydrants, utility cabinets, street signs and traffic signal lights and other obstacles currently in the boulevard could also be avoided if duct banks were located under the roadway. Further, the skyway crossing at the hospital impacts the overhead option. The specifics of impacts and encroachment should be evaluated. Other encroachments and impacts will occur when large poles are placed in the sidewalks along 28<sup>th</sup>, 26<sup>th</sup> and 31<sup>st</sup>. Additional analysis should evaluate whether the poles can exist in that space without impacting the utility of sidewalks and pedestrian accessibility and mobility.
- 41-44** | *P. 378*  
Table 6-1 regarding comparative impacts of alternatives should include a row under "Land Use, Planning, and Zoning" that compares the impacts to planned development as outlined in section 5.2.  
*Appendix B.3.3 Route A Underground*
- 41-45** | The map appears to show the transmission line going under the patio attached to the Midtown Exchange between 10th Ave S and Elliot Ave S. If it is located immediately north of the patio it would conflict with future light rail transit or other transit mode.
- 41-46** | If Route A Underground is selected the line must be located so it does not conflict with bridge removals and reconstruction. Hennepin County is planning on rebuilding the Cedar Ave and Portland Ave bridges over the Greenway in 2010. The Fremont Ave S and Nicollet Ave bridges are scheduled to be reconstructed in the City's CIP plan in 2012 and 2013 respectively. The city also has plans to recondition some or potentially eliminate other bridges.
- 41-47** | There are several topics in the DEIS that warrant additional explanation and study:  
*Noise*—The DEIS states the overhead noise does not exceed background noise. What is the unit of measure? What is the baseline for noise? How is overhead noise calculated?
- 41-48** | *Overall design and scope*—What is the consequence of a no-build alternative? What impacts could be addressed through conservation? Why was a hybrid route with some elements of over-and underground routing not considered?
- 41-49** | *Routing*—The roadway along route D is relatively free of utilities along the north side. Removal of trees and other vegetation could be avoided if duct banks were located under roadway. Why does Applicant want to minimize encroachment into the street by locating the duct banks located under sidewalks and boulevards? Preserving trees is consistent with city goals and policies and should be a significant consideration. Further, the analysis of tree types is incomplete. There are more than 50 trees along this route with some, not the majority being ash. There should be a no net loss of trees due to the construction and maintenance of this project.
- 41-50** | *Substations*— It appears that substations play an important role in the reliability of a transmission system. How is substation design different where the transmission lines are undergrounded? The discussion of substations, their design, noise and vibration generation are inadequately addressed in the DEIS. As substations may be located next to residential areas and businesses their impacts and ways to mitigate those impacts should be detailed. The draft EIS has "open" above ground substations and underground substations as options. Why were fully enclosed above ground substations not proposed as an alternative? Fully-enclosed substations are in a building with a roof that fits architecturally with the surrounding area. This can help aesthetics, noise abatement, security, and protect equipment from outdoor elements. This would also eliminate the potential freeway road salt and road carbon contamination issues which are reasons the Applicant rejected substations Mt-28N and Mt28-S. Increasingly, energy companies such as Con Edison.

## Responses

### Comment 41-44

Text in Table 6-1 and Section 6.1.1 has been supplemented to included information on impacts to planned and future development.

### Comment 41-45 through 41-46

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 41-47

Noise levels capable of being heard by humans are measured in A-weighted decibels (dBA). A discussion of common background noise levels appears in Table 5.14-1. The background noise levels in the residential areas in the vicinity of the transmission lines are estimated to be 45-55 dBA; background noise levels along busier streets and highways are estimated to be 55-75 dBA.

### Comment 41-48

See Comment 24-4, which addresses the same concern.

### Comment 41-49

Thank you for your comment. It has been noted and included in the record for this EIS. Text in Section 5.10.2.1 has been modified to note that additional trees may be located in the Project Area. Section 5.10.2.1 provides an estimate of the total number of trees that could be affected by the Project route alignments, not a count or analysis of all trees within the Project Area. The Applicant has stated a commitment to work with affected landowners to replace removed trees with other, more suitable trees and shrubs, regardless of what route is selected.

### Comment 41-50

The substation design would be similar if the transmission lines are designed as overhead or underground lines. An underground transmission line could be connected directly into the proposed substation while the lines are underground, such that any aboveground transition would occur within the walls of the substation. The Applicant has not proposed an enclosed substation design. Text in Section 3.3.1.3 has been modified to include a discussion on the potential to enclose the substations. Text in Section 5.14.2.2 has been supplemented to include information on noise levels near substations.

## Commenter 41 – City of Minneapolis

Community Planning and Economic Development and Department of Public Works

William Cole Storm  
March 5, 2010  
Page 12 of 12

In conclusion, please note that as a precursor to adoption of the Midtown Greenway Rezoning Study, the City Council approved a zoning code text amendment which increases the density allowed for multiple family dwellings in several zoning districts. This provides the means to intensify land uses along the Midtown Greenway to realize new development that supports city and county objectives for green and active living and a more balanced transportation system.

In regards to the transportation system, City policy is for East 29<sup>th</sup> Street to be preserved as a city street, and extended beyond its current termini in some locations. No vacations are anticipated or intended, and access points closed in the past are called to be reestablished as development occurs. Further, Lake Street LRT station area planning contemplated an extension of East 28<sup>th</sup> Street across Hiawatha Avenue through the site identified as the preferred location for the Hiawatha Substation West. While this extension is not designed or funded, the design of a potential substation at that location should allow for the future extension of the street as well as a bicycle path leading from the Sabo Bridge south to Lake Street.

The Midtown Greenway Trench is a federally designated historical landmark. There are also two locally-designated historical resources in the corridor; Pioneer and Soldiers Cemetery and the Midtown Exchange (Sears Roebuck). In 2005, the County developed Landscape Management Guidelines for the Midtown Greenway. The Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes (National Park Service, 1996) were used extensively in the creation of these guidelines. This area also features 37 historic bridges, 16 of which are located along Xcel Energy's preferred route for the Hiawatha Transmission Line project.

Since planning for the redevelopment and revitalization of the Greenway began in the late 1980's, efforts, as described earlier in this letter, have contributed to significant economic development benefits. These benefits as well as future intentions for growth and progress should be factored into the scoping for the Hiawatha Transmission Project. As indicated on the attachments to this memo, the value of residential construction projects from 2000-2009 exceeds \$58m while the value of nonresidential permits for this same time span approaches \$400m. The Midtown Exchange is not only an important historic landmark but also a nucleus for small business entrepreneurship, 7-Sigma being an example of a locally-owned and expanding business. Abbott Northwestern, Wells Fargo and the Midtown Medical Clinic are indicators of several key business sectors in the city. The proposed project area is very important to the city given the jobs, housing and commerce concentrated there.

Thank you for the opportunity to review and comment. We look forward to working with you through this process. For questions on these comments please contact one of the following individuals:

Karin Berkholtz, CPED  
612.673.3240  
[karin.berkholtz@ci.minneapolis.mn.us](mailto:karin.berkholtz@ci.minneapolis.mn.us)

Heidi Hamilton, PW  
612. 673.3316  
[heidi.hamilton@ci.minneapolis.mn.us](mailto:heidi.hamilton@ci.minneapolis.mn.us)

Sincerely,



Barbara L. Sporlein  
Director of Planning  
Community Planning and Economic Development



Steven A. Kotke, P.E.  
Director of Public Works-City Engineer  
Department of Public Works

## Responses

### Comment 41-51

Thank you for your comment. It has been noted and included in the record for this EIS.

41-51

## Commenter 42 – Climate Crisis Coalition

**From:** [Christine Frank](#)  
**To:** [Storm, Bill \(COMM\)](#); [Pile, Deborah \(COMM\)](#)  
**Subject:** FW: Comments by the Climate Crisis Coalition on Xcel's Proposed Hiawatha HVTL & Substations  
**Date:** Wednesday, March 10, 2010 4:13:36 PM

### COMMENTS BY THE CLIMATE CRISIS COALITION ON XCEL'S PROPOSED HIAWATHA HVTL & SUBSTATIONS

#### 3CTC'S MAIN ENVIRONMENTAL AND HEALTH CONCERNS

42-1

The Climate Crisis Coalition of the Twin Cities (3CTC) is opposed to Xcel Energy's Hiawatha Transmission Line Project for its potential contribution to climate change and the health impacts of electromagnetic fields (EMFs) and the widespread use of wooden utility poles soaked in pentachlorophenol pesticide (Penta) upon all Life—human beings, domestic animals and urban wildlife—that will be residing within the immediate vicinity of the power lines and substations. 3CTC strongly urges that the Minnesota Department of Commerce Office of Energy Security take these serious environmental and health effects as outlined below into consideration when drafting the Environmental Impact Statement (EIS).

#### CLEAN, RENEWABLE, NON-IRRADIATED VS. DIRTY, RADIOACTIVE ENERGY

Xcel proposes to transmit into the Hiawatha neighborhood by archaic and inefficient means what will be more predominantly dirty energy, spewing forth more greenhouse and acid-precipitation gases as well as toxic mercury emissions from what we suspect will be mostly coal-fired power with only a token amount of wind energy wired in from Southwestern Minnesota. Also included in the mix, will likely be power from one or another of the state's nuclear reactors, which are by no means green because of their routine radioactive emissions, ever-growing and increasingly insurmountable radioactive waste problem that will plague future generations *ad infinitum* and the continual threat of catastrophic accident that looms over us from Xcel's steadily aging and deteriorating nuclear power stations. Likewise, the use of nukes is not an appropriate means to stabilize the climate since greenhouse gases are generated in every stage of the nuclear cycle from cradle to... well, there is no grave, now, is there? Most noteworthy are the tons of chlorofluorocarbons (CFCs) emitted by uranium fuel-rod production. CFCs not only warm the atmosphere, they deplete the ozone layer, a condition which is exacerbating climate change in the polar regions. Therefore, the only thing "green" about nukes is the money it takes to build and insure them at taxpayers' expense.

42-2

With carbon dioxide emissions having spiked every year this century at the rate of 2 parts per million annually and over 40 percent of them coming from coal-fired power plants, it is astounding that even more filthy fossil fuels will be burned to achieve Xcel's proposed electrical upgrade in the Hiawatha Community. Clearly, there is a need for improvement because the area has been receiving inferior service for decades and has had to cope with numerous power outages. However, the solution is not conducting business as usual, not with Earth's ice masses melting down and the planet racing relentlessly toward irreversible tipping points that will plunge it into complete climate chaos if we do not cease and desist our destructive ways immediately. Time is running out, yet power companies like Xcel insist on following the path of least resistance with the same old scenario when there clearly is no need for it. There is an ecological and healthy alternative to Xcel spending millions on its proposed HVTL and substations. Along with economic stimulus money, the funds could be utilized to install a battery of aeroturbines of either vertical or horizontal design and solar panels on the roofs of neighborhood schools, libraries, hospitals, community centers, housing complexes such as Little Earth and industrial and commercial buildings. This would transform the community from a consumer of dirty energy into a producer of clean energy that could also be used to power mass transit. In addition, renewable energy systems would provide green jobs for members of the community who could be employed installing and

## Responses

### Comment 42-1

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 42-2

See response to Comment 20-7, which addresses the same concern.

## Commenter 42 – Climate Crisis Coalition

maintaining them.

### A SMART GRID VS. A DUMB GRID

Obviously, it is important to provide power when it is needed and prevent brownouts and blackouts. Because of friction on the wires, the amount of wasted energy is huge on the present electrical grid that delivers alternating current. The loss of power is 26 to 30 percent with an efficiency of only 70%-74%. 3CTC feels it is criminal to waste anything, especially clean energy. That is why an intelligent, efficient transmission system is needed. Many community activists pin their hopes on it as an alternative to Xcel's HVTL/Substation concept. However, despite the big deal made out of the Smart Grid Project that has been launched in Boulder, CO, it is apparent that the utility giant is not that serious about implementing its prototype nationwide. Tom Henley, an Xcel Energy spokesperson in Denver has said that it will be early 2010 before the company knows how much is being saved in energy and money on the project. Only then, can it consider expanding beyond Boulder, meaning that a cost-benefit analysis will be done on the experience to determine whether or not it will be lucrative to implement it throughout the country. The climate and the environment are, of course, secondary considerations. That is why 3CTC is for clean, reliable, renewable wind and solar power working in tandem so that one can back the other up and be delivered where needed by a smart grid. This will enable us to put planetary and human needs before private profits and SAVE MOTHER EARTH from climate catastrophe.

### THE HEALTH IMPACTS OF EXPOSURE TO ELECTROMAGNETIC FIELDS

There is growing evidence that exposure to electromagnetic fields has serious health impacts upon electrical industry workers and on other people, especially children, as well as livestock, wildlife and vegetation that exist near HVTLs.

EMF EXPOSURE AND LOW-GRADE HEALTH PROBLEMS: In 1972, Soviet research linked EMFs with fatigue, headaches and depression among people exposed.

EMFs AND CANCER: Studies conducted in the 1980s showed a correlation between EMF strength and proximity to residences and the risk of childhood leukemia. Epidemiological studies indicate a slight increase in childhood leukemia rates among youngsters living near power lines and an increase in chronic leukemia among adults who work in electricity-intensive industries. Washington state mortality data of 438,000 workers between 1950-79 showed elevated leukemia deaths in 10 of 11 occupations that involve extremely low frequency EMFs (ELF-EMFs). High rates of fatal brain cancers have been found among workers in the industry as well. ELF-EMFs may be too weak to kill cells or cause mutations and thus initiate cancer. However, they can play a role during the promotion stage of a cancer, which involves epigenetic mechanisms that affect gene expression rather than gene structure and induce cancer in cells that have already mutated. Thus, it has been demonstrated that EMFs help synergistically to promote tumors that have been initiated by carcinogenic chemicals in the environment. In addition, it is known that EMFs suppress the body's production of melatonin. Exposure to even low-frequency EMFs of 50 to 60 Hz reduces the pineal gland's output of the hormone, which regulates cell growth and can block tumor formation. Suppressed melatonin levels are linked to many cancers, including breast cancer among women.

That is why female electrical workers run a two-fold risk of getting this type of reproductive cancer. Therefore, ELF-EMFs affect very powerful hormonal mechanisms in the central nervous system and brain which in turn connect to cancer and cancer-related problems. Exposure to them affects the control and regulation of growth in both healthy and abnormal cells. They can affect the immune system by reducing the ability of circulating white blood cells to kill tumor cells as has been exhibited in cell-culture work and partially corroborated in animal studies.

FETAL DEVELOPMENT: Exposure to ELF-EMFs when an expectant mother uses an electric

42-3

## Responses

### Comment 42-3

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

## Commenter 42 – Climate Crisis Coalition

blanket, can affect fetal development with there being evidence for not only birth abnormalities but also miscarriages. Many farmers living near high-voltage power lines claim exposure to EMFs causes miscarriages, stillbirths and deformities in their livestock.

**NEURODEGENERATIVE DISEASES:** Exposure to EMFs can damage DNA in humans and lab animals. From studies done at the University of Washington, researchers have posited that ELF-EMFs increase free-radical activity in cells, thereby causing DNA damage and disturbing other cellular processes and functions. Free-radical damage can lead to cellular necrosis and apoptosis (cellular suicide) among the glial cells, myelin and neurons of the brain. Because the neurons of the brain cannot divide and replace themselves, the harm done by free-radicals due to EMF exposure can lead to neurodegenerative diseases such as Alzheimer's, Parkinson's and Lou Gehrig's, conditions which are becoming epidemic in our aging population. There can be a complicated interaction between intensity, determined by the distance at which an exposed individual is located in relation to the source and duration of exposure in the biological effects of EMFs, which occur in a two-stage molecular process that causes first, the release of iron into the cytoplasm and nucleus then the subsequent generation of hydroxyl radicals that damage DNA, lipids and proteins. The lipid damage in the cellular membrane leads to calcium leakage from the cell that triggers the second step: an increase in the synthesis of the nitric oxide free radical that can cause more iron-mediated free radicals to be generated as the process feeds back on itself. When the anti-oxidation processes fail, the cell dies and degeneration of the brain and nervous system occur.

A work group convened by the National Institute of Environmental Health Sciences reached a consensus, regarding the strength of the scientific evidence of biological health effects due to exposure to 60-Hertz electric and magnetic fields stating that EMFs such as those surrounding electric power lines should be regarded as possible human carcinogens. The group met June 16-24, 1998 in Brooklyn Park, MN as part of a series of symposia devoted to studying the published literature in the field of EMF research. The consensus was based on a two-thirds majority and focused on hazard-identification as opposed to risk assessment.

**LONG-TERM AND CUMULATIVE EMF EXPOSURES:** The exposure to the electromagnetic fields emanating from high-voltage transmission line such as the 115 kilovolt HVTL proposed by Xcel combined with daily exposure to electromagnetic radiation from microwave ovens, cell phones and towers, computers and other electronics along with the EMFs from electrical appliances will put at risk individuals living near or traveling by the power line on a regular basis of becoming dangerously overexposed to EMFs. Enough already! especially when there is no need for such an ill-conceived plan.

### THE HAZARDS OF PENTACHLOROPHENOL-LADEN UTILITY POLES

If Xcel decides to go cheap and place its proposed HVTL above ground, to transmit the additional electricity into the neighborhoods, it will very likely be using more wooden utility poles preserved with pentachlorophenol pesticide. There are already half a million of them in the eight-state region, and the utility plans to use more to replace rotted ones. People in the Seward Neighborhood have complained that the poles in their alleyways have a foul chemical odor. That isn't the half of it. If something can be smelled, that means it is off-gassing and entering the lungs and being absorbed by the system. Penta is a known toxin harmful to human beings and animals.

**PENTA IS AN UBIQUITOUS AND PERSISTENT TOXIN:** Nearly all non-wood uses of penta were banned in 1984 by the EPA because of its known fetotoxicity and oncogenicity to human health. Due to pressure from the American Wood Preservers Institute, the EPA did not ban the substance as a wood preservative, and it is still widely used for treating wooden utility poles and railroad ties. It is also allowed as an anti-fungal agent in oil-well flood waters and pulp and paper-mill solutions. As a result, it is now ubiquitous and found in the urine samples of children. It is present in the

42-4

## Responses

### Comment 42-4

Wood poles have not been proposed by the Applicant in any location for transmission facilities. A discussion of the engineering design of the transmission line structures appears in Section 3.1.1 of the EIS.

## Commenter 42 – Climate Crisis Coalition

ditchwater along railroad right of ways. Penta has been found to be leaching from storage yards where penta-preserved Douglas fir poles are stacked in vast piles by the thousands in British Columbia. When it rains, we can be sure that the pesticide is being washed off utility poles everywhere in the Metro Area and into our soil as well as surface and groundwaters, contaminating wells and drinking water and imperiling aquatic life. Penta residues can be found as deep as 168 inches in the ground and the soil around the poles contains 100 milligrams per kilogram of soil or 100 parts per million. Environment California found three penta-treated poles next to wells, causing drinking water to be contaminated. These poisonous structures are located near yards, gardens, homes, schools, parks and playgrounds.

THE HEALTH IMPACTS OF PENTA EXPOSURE: Penta-treated wood is the largest source of dioxins. It and its accompanying contaminants are persistent organic pollutants (POPs). It contains several carcinogens including tri- and tetrachlorophenol and hexachlorobenzene, dioxins and polychlorinated dibenzofurans. Ranked among some of the most noxious chemicals ever created, penta and its sister chemicals are endocrine disrupting compounds (EDCs) that mimic estrogen and cause mal-formed reproductive organs in wildlife and humans, hence, the name gender benders. EDCs make people with such abnormalities prone to reproductive cancers later in life. Elevated levels of endocrine disruptors are found in the blood of women who have experienced spontaneous abortions, infertility and menstrual disorders. They also cause immune system dysfunction. Evidence of endocrine disruption is rarely as strong as it is for penta. Xcel and the chemical industry naturally deny its serious health impacts and have been lying to people, claiming that "the dose is the poison" if exposure is low and therefore harmless. With EDCs such as penta it is not the amount one has in one's system, it is the timing of the exposure since they affect fetal and early childhood development as well as visit their deadly mutagenic effects upon the victim later in life. The synergistic interactions of the many compounds that now, unfortunately, make up our chemical body burden also have a detrimental effect.

A PETROLEUM DERIVATIVE: Penta is also a chlorinated hydrocarbon derived from petroleum. The deadly toxicity of oil-derived pesticides is just one more reason to leave the oil in the ground where Mother Nature put it. We need to end our addiction to oil in more ways than one.

### AN ISSUE OF ENVIRONMENTAL RACISM AND JUSTICE

The Hiawatha area where Xcel proposes to put its HVTL/Substation project is near the Arsenic Triangle where yards and gardens have been contaminated by arsenic used to produce pesticides at a now long-gone industrial plant. The Phillips Neighborhood is populated by communities of the oppressed nationalities who are now paying dearly for past corporate environmental sins with the erosion of their health. Exposure to EMFs and penta-laden utility poles will only exacerbate the physical problems they already face. Some community activists feel that the solution is to place the transmission lines underground—out of sight, out of mind. 3CTC does not think that residents should have to settle for an underground power line and old, inferior technologies for transmitting electricity when ecological, healthy alternatives are available. The many peoples who make up this community—Indigenous, Latino, African-American, East African—deserve a just transition to a green, sustainable economy, not further victimization by a dirty polluting one. The best way to see environmental justice served in this case is to install wind and solar power and provide green jobs paid at union scale with full health and retirement benefits to the residents so that they may improve their circumstances and live in a healthier environment.

Respectfully Submitted By,  
Christine Frank, Volunteer Coordinator  
Climate Crisis Coalition of the Twin Cities

42-5

## Responses

### Comment 42-5

A discussion of environmental justice appears in Section 5.5 of the EIS.

### Commenter 43 – Janet Court

**From:** [janet.court](#)  
**To:** [Storm, Bill \(COMM\)](#);  
[Pile, Deborah \(COMM\)](#);  
**Subject:** Transmission lines in South Minneapolis  
**Date:** Monday, March 08, 2010 12:50:34 PM

---

As a resident of South Minneapolis, living, shopping and recreating along the proposed path of the new Excel Transmission lines, I am extremely interested in making them as safe and with as little negative impact on our lives as possible.

As residents we use little electricity, so this new line is not for our convenience. The hospital complex is the largest user of electricity. New buildings had the option of being built with extreme energy saving features. This was not done and they have since suffered life endangering brown-outs.

No answer should shift cost (including lost property value), to effected homeowners along the proposed route. It is imperative that the lines be buried and the cost spread out and/or assessed to those benefiting, not those negatively impacted by the construction and operation of those lines.

In addition, it is important the the necessary sub-stations be located at sights chosen by the community, either underground or designed to be visually pleasing.

Thank you for supporting our community.

Janet Court  
1216 Powerhorn Terrace  
Minneapolis MN 55407  
612-721-9284

---

Hotmail: Powerful Free email with security by Microsoft. [Get it now.](#)

### Responses

#### Comment 43-1

Thank you for your comment. It has been noted and included in the record for this EIS.

43-1

## Commenter 44 – Niki Danou

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Danou Wed Mar 3 15:02:29 2010 E002/TL-09-38  
**Date:** Wednesday, March 03, 2010 3:15:43 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Niki Danou

County: Hennepin County

City: Minneapolis

Email: [niglet@iname.com](mailto:niglet@iname.com)

Phone: 612-823-6244

44-1

Impact: The Midtown Greenway is a beautiful urban bike and pedestrian thoroughfare that encourages healthy lifestyles, family time, alternative forms of transportation (thus helping to SAVE the environment), and a sense of community. Why are we allowing Xcel to destroy this peaceful community asset?

44-2

1. I am not interested in an ugly substation - instead of beautiful greenspace - between Portland and Oakland Avenues. This will lower property values and hamper the positive gentrification that this neighborhood is starting to experience.

44-3

2. This will most likely increase criminal activity - such as vandalism (graffiti) and other disturbances in the neighborhood.

44-4

3. What are the health concerns for the residents of the neighborhood? This is a HIGHLY populated area - are we really saying that these peoples' health and well-being is not important? Are we saying that a need for MORE POWER instead of CONSERVATION OF POWER trumps peoples' HEALTH????

44-5

4. Why is it that we can put ugly and unsafe electrical apparatus in poor

## Responses

### Comment 44-1

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 44-2

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 44-3

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 44-4

Thank you for your comment. It has been noted and included in the record for this EIS. A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

### Comment 44-5

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 44 – Niki Danou

44-5 | neighborhoods (Phillips) but not in wealthy neighborhoods? Are rich people more valuable?????

44-6 | 5. Please do NOT allow Xcel to put up overhead power lines along the Midtown Greenway. What a waste of space such a wonderful resource will become.

Mitigation: Underground is better than aboveground.

44-7 | Smartgrids and encouraged energy conservation are our future -- NOT more power lines.

44-8 | Green spaces make Minneapolis a place people want to live and work. More power lines along green spaces make people leave our community.

Submission date: Wed Mar 3 15:02:29 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
andrew.koebrick@state.mn.us

## Responses

### Comment 44-6

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 44-7

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 44-8

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 45 – MnDNR

### Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40



March 10, 2010

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7th Place, Suite 500  
St. Paul, MN 55101-2198

Re: Draft Environmental Impact Statement for the Hiawatha Transmission Line Project  
[PUC Docket Number: E002/TL-09-38]

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Hiawatha Transmission Line Project Draft Environmental Impact Statement (DEIS) and provides the following comments.

#### General

**45-1** Urban landscaping and green space provides some habitat for various local and migrating species. Generally, the DNR suggests planning routing and substation location where the impact to flora is the least.

#### 5.10.1. Affected Environment

**45-2** This sections states that "Other than the presence of the Handsome Sedge noted above, there are no other flora species noted in the NHIS (Xcel Energy, 2009)." This statement should be corrected to clarify that it is only referring to the area within a one-mile radius of the project.

#### Figure 5.12-1 and Table 5.12-1

**45-3** ERM, Inc. has obtained the Rare Features Data through a license agreement (LA-519) with the DNR. The terms of this agreement restrict the manner in which the data can be displayed in public documents. To comply with the terms of this agreement, the specific location information should be removed from Figure 5.12-1 and Table 5.12-1 in the Final EIS and should no longer be distributed in any other associated documents.

Thank-you for the opportunity to review the DEIS for the Hiawatha Transmission Line Project. Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Schrenzel".

Jamie Schrenzel  
Principal Planner  
Environmental Review Unit  
(651) 259-5115

Storm 3/10/2010



PRINTED ON RECYCLED PAPER CONTAINING A MINIMUM OF 10% POST-CONSUMER WASTE

www.dnr.state.mn.us  
AN EQUAL OPPORTUNITY EMPLOYER

## Responses

### Comment 45-1

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 45-2

Text in Section 5.10.1 has been modified to clarify that the discussion only applies to an area within a one-mile radius of the Project.

### Comment 45-3

Figure 5.12-1 has been removed from the EIS. Text in Table 5.12-1 and Section 5.12.1 has been edited to remove specific location information.

## Commenter 46 – Peter Doughty

**From:** [apache@web.lmic.state.mn.us](mailto:apache@web.lmic.state.mn.us)  
**To:** [Storm, Bill \(COMM\)](#)  
**Subject:** Doughty Sun Mar 7 12:18:33 2010 E002/TL-09-38  
**Date:** Sunday, March 07, 2010 12:18:59 PM

---

This public comment has been sent via the form at: [www.energyfacilities.puc.state.mn.us/publicComments.html](http://www.energyfacilities.puc.state.mn.us/publicComments.html)

You are receiving it because you are listed as the contact for this project.

Project Name: Xcel Energy Hiawatha 115 kV Transmission Line Project

Docket number: E002/TL-09-38

User Name: Peter Doughty

County: Hennepin County

City: Minneapolis

Email:

Phone:

Impact: I'm concerned first about the health impacts of an overhead high voltage powerline in a densely occupied urban setting. Also, I feel that the greenway is a major car free thoroughfare that needs to be protected from further industrial encroachment. I use the bikepath and know many others who also use it. I'm most familiar with the section through the Phillips neighborhood which already has major health concerns from arsenic in the soil so this neighborhood especially needs protection from further health risks.

Mitigation: I understand that burying power cables & substation is a viable option and I strongly urge that this option be chosen for this situation.

Submission date: Sun Mar 7 12:18:33 2010

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick  
[andrew.koebrick@state.mn.us](mailto:andrew.koebrick@state.mn.us)

## Responses

### Comment 46-1

Thank you for your comment. It has been noted and included in the record for this EIS.

46-1

## Commenter 47 – East Phillips Improvement Coalition



Bill Storm  
Energy Facilities Planning  
Minnesota Department of Commerce  
85-7<sup>th</sup> Place East St. Paul, MN 55101

March 19, 2010

RE: Comments of Carol Ann Pass, on  
On Behalf of East Phillips Improvement Coalition, EPIC

### *East Phillips Improvement Coalition (EPIC) Public Comment on the Hiawatha Project*

**Question:** Where does East Phillips Improvement Coalition (EPIC), the East Phillips Neighborhood organization, stand regarding Xcel's routing of overhead High Voltage Transmission Lines through the East Phillips neighborhood.

47-1

**Conclusion:** EPIC is not prepared as a neighborhood organization to jeopardize the positive impact of our immense past work and enormous investment in the reclamation and restoration of East Phillips, nor are we willing to risk the future completion of these and other new projects to accommodate overhead high voltage transmission lines through any route in any part of our neighborhood.

**Our Case:** East Phillips Neighborhood is bounded on the east by Hiawatha Avenue, on the west by Bloomington Avenue, on the south by Lake St. and on the north by 24<sup>th</sup> St. in south Minneapolis. It is a key neighborhood through which Xcel's High Voltage Transmission Lines are proposed to pass and is an urban core neighborhood of about 4,800 residents. As one of the four quadrants of the Phillips Community, it is a part of an area of about one square mile with a total population of almost 20,000 people. The Phillips Community has 7,016 children under the age of 18, 40% of whom live below the poverty level. A large proportion of these children and families live very near the proposed route of the Power Lines. The four neighborhoods are all very challenged by poverty, an already polluted landscape, limited education, large numbers of linguistically-isolated immigrants and an overall minority population of approximately 70%. Yet, surprisingly, many are homeowners and own small businesses. These are the very people of focus in the MPCA Environmental Justice Policy, as well as a variety of other Justice Policies, some of them Federal.

East Phillips has had a long, unique and storied heritage of affordable, single-family, multi-ethnic home ownership filled with many immigrants and refugees who begin their new life in the United States and their first experience with family wealth and asset creation through home and business ownership here in this neighborhood. This economic and social fact is also true of many of our own ethnic groups, Native, African and Asian Americans. This has been characteristic of the Phillips Neighborhood since it began in the mid-nineteenth century. Yet, when the EPIC Board and membership began to focus work on the East Phillips Neighborhood in 1999, Phillips in general, and East Phillips in particular, was experiencing a full scale collapse in housing and an immense crime wave.

## Responses

### Comment 47-1

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 47 – East Phillips Improvement Coalition

A radical increase in boarded buildings and vacant lots was occurring. Greater Phillips had 76 boarded buildings and 204 vacant lots in 1998 and the growth rate of this catastrophe was exponential. The boarded buildings and vacant lots intensified an unprecedented crime wave. Prostitution and drug sales soared. 1995 was the year of 'Murderapolis', but this was 1998 and yet in Greater Phillips we were still seeing continued escalation of crime and further housing collapse, family asset loss and people leaving in droves. The impetus and the fear of actually ceasing to exist as a neighborhood if this rapid downward spiral were not stopped motivated the decisions of the first board members of EPIC as well as the other Phillips quadrants: Midtown, Philips West and Ventura Village.

East Phillips Improvement Coalition (EPIC) and the other Phillips quadrant neighborhoods all began ambitious projects to turn this around. They produced and implemented land use and redevelopment plans, and began to remove dangerous, toxic and blighted buildings, replacing them with new housing. East Phillips first focused on the 2900 block of Bloomington, north of Lake St., a seriously dangerous block of slum housing that was dragging down Mpls. City investment in the commercial node there. Land use and project planning of East Phillips Commons began and an attractive seven million dollar 34-unit apartment building was accomplished. Blighted buildings were removed, dollars needed were leveraged and a calamitous slum was replaced by new housing. The building, only the first phase of the larger development still to come, radically improved the sagging commercial economy of the Bloomington/Lake intersection, in the very shadow of the Midtown Greenway, practically under the proposed route of the Xcel High Voltage Power Lines.

After this came the Village In Phillips Project on 24<sup>th</sup> St. and Bloomington Avenue, again to remove blighted and dangerous rental housing and replace it with Phase One of the overall Village Project, Franklin Station Town Homes, a twenty-eight unit series of town homes owned by homeowners, which was completed and sold by 2005. This 8 million dollar development again dramatically changed the character of the neighborhood, lessening the crime problems in a major way and bringing in stabilizing stakeholders in the form of home owning families.

Simultaneously EPIC worked to fill the huge number of vacant lots with affordable home ownership. From 2000 until now we have been partnering with area nonprofit developers to build or restore thirty-five homes at a development price tag of approximately 8 million dollars. We also used NRP dollars to leverage additional funds, offering 43 rehab grants of \$7000 a piece and 20 first-time home-buyer grants of \$10,000, totaling approximately \$300,000 in additional dollars for housing. All of this has added well over one hundred units of housing, most of it affordable home ownership, from 2000 to the present in East Phillips alone. The other quadrants of Phillips have accomplished similar turnarounds. All told, including the Midtown Exchange and there has been well over one hundred million invested in the future of the area, yet we have retained and enhanced our heritage of affordable and multi-cultural homeownership.

This effort has brought in many new families seeking a neighborhood where they could afford to have their own home and has changed the ratio of home ownership in East Phillips from just over 10 percent to 25 percent, unprecedented for almost any urban core anywhere. Significantly, our homeowner dollars went to over 70 percent minority buyers. The new stability from the new housing, both rental and homeowner, became readily apparent in decreased crime and the general appeal of the neighborhood. Families began moving back, filling our blocks.

More land use and redevelopment plans are in the works. The EPIC organization has assisted in acquisition on a large site on the Midtown Greenway for a future apartment building to continue the East Phillips Commons Project. Blighted buildings and their attendant crime issues have been removed and we are working to continue our redevelopment progress.

EPIC's continued work in development on behalf of East Phillips is taking place in the effort to build a Community Center in one of only two parks in Minneapolis, which have no center and no programs, East Phillips Park. Located in one of the poorest and most diverse neighborhoods in

## Responses

## Commenter 47 – East Phillips Improvement Coalition

Minneapolis, East Phillips Park has been ignored for thirty years with little attention and almost no funding other than what it took for police to sometimes collect the pimps and prostitutes working in the park. After a colossal effort on the part of the whole community, we broke ground last fall on a beautiful 4 million dollar Community Center, to be completed this coming fall.

### *The Xcel Power Lines Project May Undermine Major Community Progress and the Neighborhood Economic Future:*

The EPIC board members and many neighborhood volunteers have developed professional skill sets in the rigors of transforming the neighborhood from the cliff edge it was on to the now-viable living space it has become. We have also learned a great deal from managing and marketing this critical renewal process about how hard it is to stem blight and neighborhood collapse in low income and minority areas once it reaches considerable proportions. We have learned how quickly blight brings in crime, real estate speculators and absentee landlords, how damaging such a downward spiral is to already struggling families and about their loss of tenuous economic and social assets from such trends. We have also learned of the fragility of business and economic interests in low income, minority neighborhoods, the difficulty of bringing them back and how important it is to maintain them and not let them slide in the first place. This has informed in a major way our understanding of and response to the Hiawatha Project.

47-2 We are not prepared to see the exhaustive work of a generation of community volunteers be turned back and see our neighborhood revert to its former struggling and tragic past in the face of the Xcel Power Line Project nor are we willing to see our key economic and cultural asset, the Midtown Greenway, be damaged as a future engine of development and enhancement, as it would be, given the Xcel Project, especially the overhead transmission lines. If this project is to happen at all, it must be an underground project, as Xcel has done in the Downtown population areas of greater affluence.

### *Economic Impact and the False Claims of the DEIS:*

47-3 The claim in the DEIS on page 232 that "The project is not expected to result in a direct economic hardship to minority and low income populations" is simply false as is the claim on page 188 that "Transmission lines will not directly impact the residential property values". We have found universal consensus among developers interviewed regarding the negative financial consequences on residents, businesses, future development, and lost property tax revenue to the City due to lack of future development, especially on the Midtown Greenway. Expert witness Dean Devolis of DJR Architecture states that "the increased risk of loss of market value and probable insurability problems would be enough to cause developers to put their investment dollars elsewhere".

47-4 Furthermore, there is no study in the DEIS citing convincing evidence of these claims of no damage to property values. There is a strange referral to a difference between 'real' vs. 'perceived' property values. The only meaningful value relevant to this discussion is the market value, namely what someone is willing to pay for it. Any other "virtual value" is simply subterfuge and philosophical sophistry. This issue can only be resolved by consultation with those dealing in these markets, namely expert witnesses, as we have done, who have predicted serious negative property value loss based on their experience.

47-5 An additional supporting observation is the fact that the FHA mortgage guidelines, which must be met if one is to qualify for insurance, "prohibit mortgage support for homes in the fall zone of high voltage transmission towers or support structures." (DEIS Page 189) Not all of the routes trigger the full impact of this insurability problem directly, but any insurance company and/or developer will be aware of this issue and the insurance and safety problems it is a response to, increasing the probability of loss of future economic development and creating a setting for triggering major property value loss. This will impact the area whether or not the property is actually in the "easement serving the high-voltage transmission lines".

## Responses

### Comment 47-2

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 47-3

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 47-4

A discussion of the potential impacts of the Project on property values appears in Section 5.4.2.2 of the EIS.

### Comment 47-5

Thank you for your comment. It has been noted and included in the record for this EIS. A discussion of FHA mortgages appears in Section 5.4.2.2 of the EIS.

## Commenter 47 – East Phillips Improvement Coalition

### *The Economic Justice Issue not adequately addressed in the DEIS:*

Many of the home and business owners came here as refugees having fled problems with large governmental or private entities, which, among other negatives, made asset loss a chronic condition and wealth creation impossible in their native land through confiscation, theft or elevated risk. As such, the overhead power lines pursued by Xcel Energy would have similar negative real and ethical consequences as well as major economic implications, regardless of Xcel's stated intent, since this would be a loss forced on these people without their consent and detrimental to their lives, clearly a serious moral issue. However, because the property value loss is either denied or sidestepped in the DEIS, the economic justice issue and the economic justice issue is never seriously, honestly and transparently addressed.

47-6

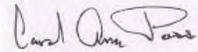
Executive Order 12898 (President Clinton) states that "... each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States..." While this policy has tended to be applied to air pollution issues, the justice issue in the present case should also be understood as a justice issue in like manner. It is a forced asset loss issue as surely as is confiscation in a foreign country or failed state, since the implication for the family is the same. They lose their wealth in the form of their property's resale value loss. Federal dollars and possibly Federal review may make this a Federal issue, but regardless of that concern, the EPIC membership believes that the Hiawatha Project may violate this Executive Order. In addition, Executive Order No. 12250 requires "effective" implementation of laws prohibiting discriminatory practices in programs receiving Federal financial assistance. I am unaware if the Hiawatha Project will be receiving Federal assistance, but again, such assistance may require conformity to Executive Order 12250 as well.

47-7

The EPIC organization has as part of its mission the protection and enhancement of the economic life of its people, particularly those chronically underserved. As such, the EPIC membership will not accept or stand down in the face of the obvious loss of resale value to low-income and/or minority owners of businesses and homes, especially those who are first-time home or business owners. We will respond in whatever way necessary to disallow what is both an important ethical as well as economic threat to our residents.

47-8

Carol Ann Pass, president  
East Phillips Improvement Coalition, EPIC  
612-280-8  
[cpass2@rumbbox.com](mailto:cpass2@rumbbox.com)



## Responses

### Comment 47-6

A discussion of the potential impacts of the Project on property values appears in Section 5.4.2.2 of the EIS.

### Comment 47-7

Environmental justice was identified as a concern during the scoping process and evaluated in the EIS using the federal construct established in Executive Order 12898 as a guide. The federal construct was used for guidance purposes only; the Project is not a federal project and not subject to a NEPA review or Executive Orders 12898 or 12250.

### Comment 47-8

Thank you for your comment. It has been noted and included in the record for this EIS.

## Commenter 48 – East Phillips Improvement Coalition



Bill Storm  
Energy Facilities Planning  
Minnesota Department of Commerce  
85-7<sup>th</sup> Place East St. Paul, MN 55101

March 19, 2010

RE: Comments of Carol Ann Pass, on  
On Behalf of East Phillips Improvement Coalition, EPIC

*East Phillips Improvement Coalition (EPIC)*  
*Additional Public Comments on the Hiawatha Project*

This Statement is on behalf of the East Phillips Improvement Coalition (EPIC), the neighborhood organization serving East Phillips, regarding Xcel's routing of overhead High Voltage Transmission Lines through the East Phillips neighborhood regarding their implications for the health of neighborhood children and families.

We find the Draft Environmental Impact Study seriously flawed with information limited and partisan in scope, offering only information in agreement with Xcel Energy's company plans as they currently stand. We find a lack of objectivity, scientific depth, breadth of research and thoroughness. Given the community they are approaching as host for this project, this is remarkable. This is, undoubtedly the most fundamental issue for residents and businesses, especially given the heightened awareness of the community to its already serious pollution, toxic waste and health issues emergent from these factors and its attendant poverty, especially in Phillips' children.

East Phillips Neighborhood is bounded on the east by Hiawatha Avenue, on the west by Bloomington Avenue, on the south by Lake St. and on the north by 24<sup>th</sup> St. in south Minneapolis. It is a key neighborhood through which Xcel's High Voltage Transmission Lines are proposed to pass and is an urban core neighborhood of about 4,800 residents. As one of the four quadrants of the Phillips Community, it is a part of an area of about one square mile with a total population of almost 20,000 people. The Phillips Community has 7,016 children under the age of 18, 40% of whom live below the poverty level. A large proportion of these children and families live very near the proposed route of the Power Lines. The four neighborhoods are all very challenged by poverty, an already polluted landscape, limited education, large numbers of linguistically-isolated immigrants and an overall minority population of approximately 70%. Yet, surprisingly, many are homeowners and own small businesses. These are the very people of focus in the MPCA Environmental Justice Policy, as well as a variety of other Justice Policies, some of them Federal.

Phillips residents have had a continuous battle against a variety of major health challenges for as long as many of us remember. Neighbors have had to battle the existing and usual toxic remnants of an old industrial city neighborhood: lead, in East Phillips case arsenic, asthma-producing particulate matter and numerous other toxic site and pollutants. Studies and remediation have still not undone this damage and we still encounter the tragedy of childhood retardation from lead poisoning.

## Responses

## Commenter 48 – East Phillips Improvement Coalition

However, residents have also had to fight a steady stream of new polluting and health-damaging industries whose agencies have attempted to place in our already encumbered and health challenged community. There has been the Hennepin County Garbage Transfer Station, a major project for gathering most of Hennepin County's garbage, bringing vast numbers of garbage trucks through the neighborhood, defeated in 1999, the Midtown EcoEnergy Burner, bringing 37% more asthma-producing particulates and "a major source of hazardous air pollutants" (MPCA Technical Document, Nov. 2007, page 2) defeated in 2008, the expansion of the City Asphalt Plant, defeated in 2008, and the Metro LRT Car paint-spraying shop, defeated in 2009.

In each case, residents found that even when it was clear that these new industries would seriously exacerbate the already existing health challenges of the very high density of the minority and other children here, still investors, many elected officials and others continued to offer strong resistance to stopping these projects. The human dimension and the environmental justice issues were consistently and systematically ignored and suppressed. In the case of the biomass burner, only when a law was passed which prohibited its construction, and when the City Council and Mayor withdrew support, and when Xcel energy no longer would offer a power purchase agreement did the investment group give up on the project. From every appearance, the fact that the biomass plant would add significantly to the health challenges of a large population of minority and low-income children was never publically acknowledged nor did it appear to figure in the investors' decision to divest themselves of the project.

We have also become keenly aware of the chronic neglect, comparative low capital funding, and the overwhelming struggle of people in these minority and low-income neighborhoods. We have experienced first hand the impact, struggle and challenges some large corporate entities have brought to the Phillips neighborhoods and are aware of the low priority the health of the children of many ethnicities have for many large companies.

Given this history, it should come as no surprise that the EPIC organization and the East Phillips Community members who are familiar with the DEIS are deeply disappointed in the brevity and character of its remarks concerning health and safety.

### *The Problem of 'Conflict of Interest' and the lack of scientific objectivity presented:*

First, upon researching the websites of the DEIS preparers, we could find no public health expertise or expressed public health concerns. Perhaps these things are on these websites, but we only found attention to efficiency and cost control, a "getting the job done" approach with minimal "costly delay". Both SRF and EMR, the preparers, from appearances fail to discuss health concerns or possible community losses on their web sites, nor did we find listed experts in managing public health issues, though they deal with projects that have major population health impacts. We also found no consideration or expert sources listed regarding ethical or environmental justice issues. Again, the emphasis was on pushing ahead with minimal delay. This would suggest a defensive posture toward ethical concerns, not a progressive effort to anticipate and respond to such concerns openly. Sadly, when this is the case, the community is usually pressed into an adversarial stance, which they may not prefer, but cannot avoid.

Second, the quotes cited in the DEIS appear to have been selected less for scientific objectivity or fairness to the evidence, than to support this same approach of pushing ahead and side-stepping public health concerns instead of meeting them with honesty. For example, while the DEIS (pg. 239) quotes the World Health Organization as stating that "exposures below the limits recommended in the INNIRP (1998) EMF Guidelines, covering the full frequency range from 0-300GHz, do not produce any known adverse health effect. However, there are gaps in knowledge still needing to be filled before better health risks can be made." (WHO 2009) It appears there is more to be said here. David Carpenter cites in his direct testimony for a different Xcel Energy case that the 2007 WHO Report states the epidemiological data "show an association between ELF magnetic field exposure and an increased risk of childhood leukemia". It would have been more objective and fair to include this and other quotes as well, since they are available on both sides of this issue. (See the Midtown Greenway Website for David Carpenter's testimony).

## Responses

### Comment 48-1

A discussion of EMF appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS. Publications from national and international health organizations were relied upon for the discussion of EMF in the EIS.

### Comment 48-2

Thank you for your comment. It has been noted and included in the record for this EIS. Text in Section 5.6.1.2 has been modified and supplemented to include a discussion of Dr. Carpenter's research on the relationship between EMF and diseases.

48-1

48-2

## Commenter 48 – East Phillips Improvement Coalition

## Responses

48-3 Also while the National Institute of Environmental Health Sciences (NIEHS, 1999 ) is cited as concluding that “ELF-EMF cannot be recognized as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard”, the DEIS preparers conclude that this is not sufficient “to warrant aggressive regulatory concern”. Again, the Carpenter testimony cites the “fairly consistent pattern of a small but increased risk with increasing exposure that is somewhat weaker for chronic lymphocyte leukemia than for childhood leukemia.” (NIEHS, 1999) The U.S. National Academy of Science Report (1997) states that “the link between power line wire-code rating and childhood leukemia is statistically significant (unlikely to have arisen by chance) and is robust” in the sense that removing a study from the group does not alter the conclusion that an association exists.” Carpenter makes the point in his testimony that “all three of these reports have accepted the demonstration of a statistically significant relation between elevated magnetic power line fields and childhood leukemia.” This is never clearly stated or even recognized by the DEIS preparers. It is never offered to the public reading the EIS for their consideration, yet this may be the most important issue addressed in the whole manuscript.

48-4 Some remarks: 1) why is the consistency of statistical significance of this link between EMF exposure and childhood leukemia never really discussed in the DEIS and quotes to this effect never made available to the public even when they are sometimes found in the same documents cited by the DEIS? 2) The second disturbing fact about the DEIS handling of this information is the statements discrediting the implications of the consistency of statistical significance by claiming that, because a mechanism for the effect of this exposure has not been found, claiming any causality is suspect. It has been pointed out that scientists do not know the mechanisms of many cancers, but we often use statistical consistency showing that greater exposure to a possible source leads to greater occurrence of a disease to “determine a causal relationship” (Carpenter, P.7) and frequently to set public policy.

If increasing proximity and/or increasing length of exposure or both consistently increases the risk of childhood leukemia, even slightly, this would seem enough to err on the side of caution and regulate EMF more aggressively. We do this with regard to many diseases, especially possible pandemics, using epidemiological studies and watching trends of appearance to determine the possible source of a disease. If we find consistency with a conjunction of possible sources, this helps to narrow the possible causes. We do this in the early stages of seeking causes for many diseases. Childhood leukemia is in the early stages of determining causality and determining a source usually precedes determining a mechanism. Determining a consistent pattern of greater likelihood with greater exposure to EMF is critical in the quest for discovery of a cause and also for the protection of our children. The question would appear to be: how certain do we have to be to change what we are doing, and that relies on how important the issue or possible consequences are to us.

### *Mitigations:*

Given the health and economically challenged character of the neighborhood’s people, especially its children, an application of the Precautionary Principle should be in order. (cited in Carpenter, Reviews on Environmental Health, Vol.23,NO.2, 2008, pg. 93)“This principle provides justification for public policy actions in situations of scientific complexity, uncertainty and ignorance, where there may be a need to act in order to avoid, or reduce, potentially serious or irreversible threats to health or the environment, using an appropriate level of scientific evidence, and taking into account the likely pros and cons of action and inaction “. The 7016 children of Phillips, 40% of whom live in poverty, approximately 70% of whom are ethnic and racial minorities, we think application of the Precautionary Principle and erring on the side of caution is mandatory. The power lines, if they are constructed at all, must go underground at a safe depth on a safe route where we can count on almost no exposure at all.

48-5

48-6 In addition, while the DEIS compiles a great deal of valuable information, the EPIC board believes that a DEIS prepared by those who have a large stake in having this project happen is not the best way to avoid the results that a ‘conflict of interest’ would produce. Much is spun in the direction of efficiency in producing the product, not in the efficacy of a just result or in the highest interest of

### Comment 48-3

The quote provided in the comment regarding the scientific evidence of EMF health studies not sufficient to “warrant aggressive regulatory concern” is not a conclusion of the EIS, but a direct quote from the National Institute of Environmental Health Sciences. A discussion of EMF and its relationship to adverse health effects appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

### Comment 48-4

Thank you for your comment. It has been noted and included in the record for this EIS. A discussion of EMF and its relationship to adverse health effects appears in Sections 5.6.1.2 and 5.6.2.2 of the EIS.

### Comment 48-5

Thank you for your comment. It has been noted and included in the record for this EIS.

### Comment 48-6

Thank you for your comment. It has been noted and included in the record for this EIS.

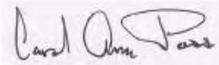
## Commenter 48 – East Phillips Improvement Coalition

protecting public health. We have to believe it is possible to accomplish both, though with a greater time frame and possibly not with corporations beholden in any way to Xcel. We are not paid experts with a great deal of resources, and yet we think with regard to some of these issues we could do a better job, especially with both the issues we have considered here, the objectivity of both the economic issue and the public health issue and the ethical issues in both cases.

48-7

We do not believe an adequate and responsible job has been done on these concerns sufficient to seriously protect the many children living here and anything less is unacceptable. Our conclusion as a Board and many in the community is that the level of expertise, objectivity, good science and ethical astuteness in these critical aspects of an EIS document would be better served by an outside consulting firm with no connection to the companies engaged in producing the project or in some cases even research by the community itself. This is too important to the community to have a product clearly so conducive to serving the aims of Xcel Energy and SRF.

Carol Ann Pass, president  
East Phillips Improvement Coalition, EPIC  
612-280-8  
[cpass@rumbox.com](mailto:cpass@rumbox.com)



## Responses

### Comment 48-7

Thank you for your comment. It has been noted and included in the record for this EIS.