**From:** Gordon, Cam A.
**To:** Storm, Bill (COMM);
**Subject:** Comments on Draft DEIS
**Date:** Wednesday, March 10, 2010 4:42:17 PM

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Dear Mr. Strom,

The following are my comments related to the Draft Environmental Impact statement (DIES) for the proposed Xcel Energy Hiawatha 115kV Transmission Line Project.

I commend you on drafting a significant report that takes a good first step towards assessing the environmental impacts of this project. I hope my comments will be helpful.

I also know that the City, and many others, will be providing additional and more comprehensive comments that I expect to be carefully reviewed and taken into consideration. With that in mind, I offer the following select comments that I feel warrant special emphasis.

1.2
My first concern relates to the overall scope of the project. As the DEIS explores alternative routes and locations for substations, there seems to be no study of the alternative of a no-build option. What other actions could be taken to manage the increased demand on the grid through conservation? What kinds of alternative technology, including smart grid, co-generation, geothermal and solar energy, could be used at large properties like the Midtown Exchange building, Allina, Wells Fargo and the Children's Hospital, to reduce demand and reliance on Xcel's energy sources? Similarly, what alternatives could be used throughout the area for energy storage, production and conservation?

1.2.1
How do we know that this is not a phase of connected actions? During the DEIS period we heard repeatedly of Xcel Energy's plans for power line extensions to both the east and west. Some even referenced drawings and maps. I, along with many others, am not convinced that this project is not part of larger connected or phased

actions. The DEIS states that there are “no connected actions associated with the project,” yet offers no evidence or for this assumption.

This question only gets more perplexing due to the fact that, in section 3.5, there is a discussion of “future options to accommodate future expansion.” The DEIS states that Xcel Energy does not have “current plans” for expansion, but then admits that expansion may be necessary. Were past plans turned over and reviewed? What discussions and future plans have been revealed that would lead one to conclude an expansion would be necessary, and why then wasn’t a full investigation done about how this project may or may not be one phase of connected activities in the future?

1.4.1
In discussing the applicant’s preferred route and throughout the DEIS there is an assumption that a double line is needed. There is no study of a single line, or the alternative of having this line go through the area further east and/or west to connect other substations. If the line was longer, one of the substations may not be needed. This alternative could have been studied.

4.2
The DEIS looks at above ground and underground substations, although only an analysis of one of the Hiawatha substations appears to have been conducted and addressed. What is the feasibility of undergrounding the station at all the proposed locations and alternatives?

Furthermore, no study of fully enclosing the substations appears to have been done. Full enclosure would be much more in keeping with the design and building guidelines of the area and should be more fully studied.

5.1
I share the concerns expressed in the City of Minneapolis comments about the understatement of the fall impacts. Unless an above-ground line is built specifically to withstand cascades, they are a

possibility, and the failure of any one transmission tower is likely to impact the surrounding community not only through its own fall distance, but that of the conductor and the adjacent towers, unless they are dead end structures.

5.6
While there is some discussion about electromagnetic fields, the DEIS does not appear to give this serious concern enough consideration. The research in this area points to some health impacts that have few findings to support them, and some that have robust and significant research to back them up, yet the DEIS fails to make any distinction. Research also indicated that within this area there is significantly greater risk of cancer among certain populations, including pregnant women, newborns and young children. The DEIS provides little or no information about the approximate number of pregnant women, newborns or young children in the area at any given time, including hospitals where mothers give birth, child care centers that serve infants, toddlers and preschoolers, elementary schools or secondary schools, and agencies like the YWCA that serve young children and families on a daily basis. This information is necessary to truly assess the risks of the different power line and substation alternatives.

Finally, I want to note that I share concerns that the DEIS as written does not adequately analyze the data about the surrounding community through the lens of environmental justice. Placing this facility in this location impacts several of the principles laid out in Executive Order 12898, due to the fact that the surrounding community clearly has a high rate of both “minority” and “low income” populations. The DEIS does not currently demonstrate that the project has done what is necessary to “avoid, minimize or mitigate disproportionately high and adverse human and environmental effects.” Indeed, this project, especially if the above-ground option is chosen, will be a good example of siting a facility with disproportionate negative impacts in a low-income, minority community with few meaningful mitigations of any kind. More analysis of this project in regards to this Executive Order is required.

Cam Gordon
Minneapolis City Council Member, Second Ward
673-2202, 296-0579
cam@camgordon.org
http://www.ci.minneapolis.mn.us/council/ward2/
http://secondward.blogspot.com/