Minneapolis
City of Lakes

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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 29th 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.

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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

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.

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.

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.

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.

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?

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 polices and plans including those within *The Minneapolis Plan for Sustainable Growth* as well as associated neighborhood and area wide plans.

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.

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.

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.

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.

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.

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.

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.

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."

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).

The DEIS states that the eastern terminus of the Uptown Small Area Plan is "Calhoun Avenue." The correct eastern terminus is Bryant Avenue South.

"Lyn-Lake Small Area Plan" is misspelled.

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/

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.

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.

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?

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.

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 2001Cultural 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.

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.)

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)).*

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*

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)."

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.

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."

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/26th 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.

The location of the proposed substation at Mt-28N is a historic resource. The site north of 28th 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 (11th 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.*"

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.

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.

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

Exchange, which includes 357 new units in the renovated Sears building as well as new construction lining a parking ramp across the street.

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 buy 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."*

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.

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.

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)

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.

Pg. 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.

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.

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)?

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.

P. 297
It appears that the reference to Hiawatha West Substation contains an erroneous reference to a Midtown West Substation. This should be corrected.

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.

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.

P. 366
Regarding Section 5.16.2.1, Route D from 28th 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.

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 28th, 26th and 31st. Additional analysis should evaluate whether the poles can exist in that space without impacting the utility of sidewalks and pedestrian accessibility and mobility.

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

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.

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.

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?

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?

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.

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.

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 29th 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 28th 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 hallmark 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:

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Sincerely,

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