

**From:** Apache  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Bastian Thu Jul 9 19:01:50 2009 E002/TL-09-38  
**Date:** Thursday, July 09, 2009 6:57:07 PM

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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: Corrie Bastian

County:

City: Minneapolis

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

Phone:

Impact: The Greenway is one attribute of Minneapolis that allows for recreation and diversified access to parks and businesses. The Greenway is unique in that, as a well as a thoroughfare for travel, it is a place for community and festivity, which develops Minneapolis as a city that is good to live and raise your children in, as well as a city that is fun and beautiful to visit. The Greenway puts Minneapolis in the map, as far as I am concerned.

I am not in favor of the Transmission Line Project as proposed "Above Ground" for this area. I think the Transmission Line proposed for this area will be a stark presence in the landscape here and will take away the beauty and utility of a very charming bike trail. I am in favor of burying this line--and prefer route D--below 31st St.

I utilize the Greenway nearly every day and this issue is very important for me and for my neighborhood.

Thank you for hearing my comment.  
Corrie Bastian

Mitigation:

**From:** [Gjerry Berquist](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** High Voltage Lines  
**Date:** Friday, July 10, 2009 4:51:48 PM

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The Environmental Impact Statement for Xcel's Proposed Hiawatha Project should pay attention to the impact of this further blight on a neighborhood that has enough pressures on it already. They bury lines in Minnetonka, why not here. I also believe that the cost of this line should be considered being paid by the owners of the utility not the rate payers like you and I.

Gjerry Berquist  
46 Prospect Blvd  
Saint Paul, MN 55107  
Public Policy Participant

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 Borrman

County =

City = St Paul

Email =

Phone =

Impact: = I understand this corridor makes sense for a power line, but one of my favorite thing about riding the greenway and other paths in the cities is that they don't run along power lines. I ride to work along the greenway and appreciate that I don't have a headache by the time I reach downtown Minneapolis. Occasionally I will ride in Roseville, Andover, Apple Valley, etc. areas to reach a meeting or a friend and the bike paths there often run along power lines. I ALWAYS get a headache when riding beneath high voltage power lines. This is bad for public health. Because the greenway is so well-traveled, the public health impacts should really be considered. I get a headache just thinking about the headache I will get every day riding to and from work.

Please don't put the high voltage power lines in such a well-traveled corridor by bicyclists and pedestrians. If you do, figure out how to mitigate the voltage so we don't have to constantly complain about headaches. Focus money on conservation, not on increasing capacity. Thank you!

Mitigation =

Submission date = Wed Jun 17 12:34:32 2009

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)

**From:** STEVEN CARLSON  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Hiawatha project  
**Date:** Monday, June 22, 2009 9:31:41 PM

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Dear Mr. Storm:

I am contacting you about the proposed Hiawatha project.

I am vice chair of the board of trustees of the American Swedish Institute, and I have worked in Minneapolis since 1985.

It is disappointing that higher voltage overhead lines are being proposed by Excel for residential neighborhoods in Minneapolis.

Notwithstanding Minnesota's short term economic problems, I would have thought such lines should be underground in populated urban areas in the twenty-first century. Otherwise, Excel will effectively be taking property without compensation, by substantially reducing the value of affected persons' property. Important health and safety issues also come to mind and are probably of even greater concern.

I am particularly discouraged about and opposed to the option that would cause the lines to abut two entire sides of the ASI property: up Oakland and over on 26th Street. This would be particularly damaging to this historic and heavily used facility. ASI is also about to get started on a new, multi-million dollar building next to the existing 100 year old museum building, and these lines will discourage our visitors -- as well as people who live in the neighborhood. We have been committed to strengthening our neighborhood and the City of Minneapolis. The higher voltage lines would severely undermine what we are trying to accomplish.

There are other, better alternatives for the lines -- if such lines are required. I ask that you select one of those alternatives.

Many thanks for your consideration.

Sincerely,  
Steve Carlson

952-926-1123

**From:** [Jeff Carlson](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** High voltage transmission lines in the Midtown Greenway?  
**Date:** Monday, June 29, 2009 9:47:16 AM

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This must be a nightmare. Somebody wake me up. I am car-free, and I live a few blocks from the Nicollet Avenue entrance to the Midtown Greenway. I ride on the Greenway almost every day. It is beautiful, one-of-a-kind. I have traveled extensively and have yet to find a better urban bikeway. Please don't build those transmission lines. Let's take all the money we would have spent on them and launch an all-out campaign to encourage conservation in the Midtown neighborhoods.

Jeff Carlson  
2729 Pleasant Avenue South  
Minneapolis, MN 55408

**From:** Apache  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Collins Tue Jun 16 11:23:34 2009 E002/TL-09-38  
**Date:** Tuesday, June 16, 2009 11:19:26 AM

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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 = Reuben Collins

County = Hennepin County

City = Minneapolis

Email = reubencollins@gmail.com

Phone = 612-229-9388

Impact: = UNDERGROUND. I support only an underground option for new transmission lines through the City of Minneapolis. Overhead utilities are inconsistent with the redevelopment efforts outlined in the Minneapolis Comprehensive Plan, small area plans, and neighborhood vision statements. I support the construction of a new transmission line only if it is underground.

Mitigation = Mitigation should include placing all new transmission lines through the City of Minneapolis underground.

Submission date = Tue Jun 16 11:23:34 2009

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)

## **Comments from the Center for Earth, Energy and Democracy at IATP**

Re: Issues to Include in the Minnesota Department of Commerce Office of Energy Security's Environmental Impact Statement regarding Xcel Energy's Proposed Hiawatha Transmission Expansion (PUC Docket No. E002/TL-09-38)

July 10, 2009

To:

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
Saint Paul, MN 55101-2198  
Bill.storm@state.mn.us

Dear Mr. Storm,

Thank you for the opportunity to comment on topics to be included in the Environmental Impact Statement (EIS) for the proposed Xcel Energy Hiawatha substation and high voltage transmission line project (the Project). Below are points of analysis the Center for Earth, Energy and Democracy at IATP feels should be included within the upcoming EIS. Please feel free to contact us at anytime with questions.

### **I. The Project is Located in an Environmental Justice Neighborhood and an Environmental Justice analysis of disproportionate impacts from the Project should be conducted.**

All of the preferred and alternative routes and substation locations proposed for the Project are located in the South Minneapolis Phillips neighborhood. Based on latest census information, there are over 75 percent people of color in the Minneapolis Phillips neighborhood, compared to a state average of 4 percent. In addition, nearly 33 percent of the residents in Phillips belong to a sensitive population (over the age of 65 or under the age of 5). Contaminated sites in Phillips are over two times that of Minneapolis as a whole. This unequal spatial distribution of environmental risk and Not In My Back Yard (NIMBY) industries in Phillips is at the heart of environmental justice issues surrounding this project.

### **II. The Need for the Project should be assessed - Assumptions used for Projecting Demand-side Growth in the Project Area should be made Transparent, Incorporate Latest Policy Information, and have Community Input.**

Based on information provided on Xcel Energy's website<sup>1</sup>, we understand the project will *increase* current capacity to the South Minneapolis neighborhoods to meet "projected demand for the area" and that the plan is based on Xcel's study for a "20-year long-range electric delivery system."<sup>1</sup>

The assumptions that the demand scenarios for the Project Area were developed under must be made clear to community members in the Project area. The demand modeling must also take into consideration latest policy developments, including the impact of implementing the 2007 state mandated efficiency targets and Conservation Improvement Program (CIP) efficiency investments

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<sup>1</sup> <http://xcelenergy.com/Company/Transmission/Transmission%20Projects/Pages/HiawathaProject.aspx>

specifically in the Project Area.<sup>2</sup> The EIS should evaluate: What the historical and current rate of investment of CIP dollars/kWh saved is in the Project area and how that compares with other Minneapolis neighborhoods and like communities in Xcel's service area and across Minnesota utilities? Additionally, modeling must incorporate the projected increased investment in energy efficiency and on-site renewable potential in the Project area as promoted by the Department of Energy and Minnesota Office of Energy Security (OES) through upcoming 2009 Federal American Recovery and Reinvestment Act (ARRA) funds and priorities.<sup>3</sup> What is the planned investment by OES of the expected \$54.1 million energy stimulus dollars in the Project Area and how does that compare with other Minneapolis neighborhoods and like communities in Xcel's service area and across Minnesota utilities? The demand expectations by consumer class must also be made clear – who within the Project area is benefitting from the increased electricity usage and who is bearing the burden of cost. For instance, if demand projections are based on commercial and industrial growth in Phillips and South Minneapolis, are these growth assumptions in line with community vision for the neighborhood long-term? Additionally, how will smaller consumers, such as renters and other residents, be benefitting in a real way? Considering the higher than average renter rate of Phillips, when compared to other neighborhoods of Minneapolis or the state, it is important that this Project does not result in low income renters/residents bearing the cost of the project with minimal or no benefits. Although a Certificate of Need is not needed for this scale of project under current Minnesota statutes, we still question the assumptions that went into the projected estimation of future load growth, and ask that the EIS make transparent the projected demand scenario assumptions and ratepayer impact based on the conditions outlined above. Additionally, any future documentation should allow for community input into assumptions for load growth in the given Project Area.

### **III. The EIS Must Consider the Impact of any Increased Greenhouse Gas Emissions Resulting from the Project.**

Xcel Energy has stated that 40% of the new energy load to be delivered into South Minneapolis is proposed to come from "new and renewable" energy sources. The EIS should make clear what constitutes "new" or "clean" as it is unclear whether nuclear energy is included within this categorization. What specific fuels are being designated as "renewable" under this project should also be clear, considering the broad definition of "renewable" under state statute. Furthermore, if 40% is "new and renewable", this would mean that 60% of the additional electricity coming into the City on the new transmission lines will likely be coming from conventional electricity generation sources. Thus, in addition to already existing coal burning and greenhouse-gas emitting

<sup>2</sup> CHAPTER 136--S.F.No. 145. <https://www.revisor.leg.state.mn.us/data/revisor/slaws/2007/0/136.pdf>  
The Next Generation Energy Act passed by the Minnesota Legislature in 2007 and signed by Governor Tim Pawlenty sets an energy conservation goal to achieve annual energy savings equal to 1.5 percent of annual retail energy sales of electricity and natural gas; strengthens Minnesota's commitment to the development of locally owned renewable energy projects; and sets a global warming mitigation target of cutting the state's greenhouse gas emissions to 15 percent below 2005 base levels by 2015, 30 percent by 2025 and 80 percent by 2050.

<sup>3</sup> According to the Office of Energy Security website: The federal stimulus bill has provided an additional \$54.1 million to Minnesota's State Energy Program to be used for job creation and retention, energy efficiency, and renewable energy activities. Program details have been determined by the legislature through passage of Chapter 138 - S.F. 657 - Federal Stimulus for Energy Programs:  
[www.revisor.leg.state.mn.us/laws/?id=138&doctype=chapter&year=2009&type=0](http://www.revisor.leg.state.mn.us/laws/?id=138&doctype=chapter&year=2009&type=0)

energy delivered to Minneapolis, Xcel is now proposing an *increase* in the delivery and transmission of these conventional generation sources into the Project Area.

Considering the above discussion, within the EIS the following questions should be answered using life cycle greenhouse gas assessment methodologies where appropriate:

1. How, if at all, does the Project comport with the State of Minnesota's "Next Generation Energy Act"<sup>4</sup>? The Next Generation Energy Act, passed in 2007, mandates that Minnesota must reduce its greenhouse gas emissions 15% by 2015, below 2005 levels; 30% by 2025; and 80% by 2050.
2. What is the increased cost to ratepayers in the Project Area if a cost to carbon is placed at the national and international levels<sup>5</sup>? Namely what will the cost of the project and ratepayer impact be at costs of \$20/ton, \$30/ton, and \$40/ton of carbon dioxide equivalent?
3. Is this consistent with the "Midwest Governor's Association Greenhouse Gas Reduction Accord"<sup>6</sup>? Does the Project demonstrate that it comports with a "Low-carbon energy transmission infrastructure that will provide a cost-effective way to supply the Midwest with sustainable and environmentally responsible energy."
4. Is the Project's increased delivery of conventional energy into Minneapolis consistent with the City's Sustainability Indicators for climate change and green jobs<sup>7</sup>, as well the City's goals as a signatory to the Cities for Climate Protection campaign<sup>8</sup>? The increase of greenhouse gases that could occur because of the Hiawatha transmission expansion would further propagate the negative effects of climate change, effects that have been well documented by the Intergovernmental Panel on Climate Change as well as the recently released White House report *Global Climate Change Impacts in the United States*.<sup>9,10</sup>

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<sup>4</sup> CHAPTER 136--S.F.No.145.

<sup>5</sup> Congress and the Obama Administration have made moving national climate policy forward a priority; the United States has agreed to participate in the international United Nations Framework Convention on Climate Change in Copenhagen in December.

<sup>6</sup> <http://www.midwesternaccord.org/midwesterngreenhousegasreductionaccord.pdf>

<sup>7</sup> <http://www.ci.minneapolis.mn.us/sustainability/climate-change.asp>

<sup>8</sup> International Council for Local Environmental Initiatives (ICLEI: <http://www.iclei.org/abouticlei/members/member-list>). Duluth, Minneapolis, St. Paul, plus a dozen other Minnesota cities and counties are members of the Cities for Climate Protection (CCP) campaign, joining 500 local governments in the United States, and many more worldwide.

<sup>9</sup> See White House Report released June 16th, 2009: "Global Climate Change Impacts in the United States" representing a consensus of 13 agencies developed over a year and a half : <http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts>

<sup>10</sup> See Intergovernmental Panel on Climate Change Fourth Assessment Report, Working Group II: Impacts, Adaptation and Vulnerability: <http://www.ipcc.ch/ipccreports/ar4-wg2.htm>.

#### IV. Considering the High Cost of the Hiawatha Transmission Project, Sustainable and Alternative Energy Mechanisms must be investigated as Alternatives in the EIS

Based on the information provided by Xcel, the proposed substations are estimated to cost \$25.4 million dollars; with the transmission lines, depending on if they are buried or not, ranging from an additional \$3 million (above ground) to \$16.4 million (buried). Thus, regardless of the route chosen, this project is *at minimum* an investment into the community of \$28.4 million, likely to be transferred through cost recovery to rate payers.

The EIS should evaluate: For an investment range of \$28.4 million to \$41.8 million - how many businesses, commercial buildings and houses could be refurbished to decrease demand; what level of existing transmission line upgrades could occur; how much on-site renewable energy could be developed to green Minneapolis; and how many local jobs could be trained and created? What would the resulting greenhouse gas emissions reductions as well as other criteria air pollutant reductions be in Xcel's system and South Minneapolis accordingly? Investing in the end user needs of businesses and residents are proving across the country to increase the income of community residents, improve air quality, provide residents and businesses with meaningful jobs, and actually work to reduce energy bills rather than increase them.<sup>11</sup>

Thank you and please feel free to contact us with any questions. We look forward to working with you further in the future.

Regards,  
Shalini Gupta  
Center for Earth, Energy and Democracy  
at the Institute for Agriculture and Trade Policy  
2105 First Avenue South  
Minneapolis, MN 55404  
Ph: 612.879.7515  
[www.iatp.org/ceed](http://www.iatp.org/ceed)

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<sup>11</sup> For example, the Sustainable Energy Utility model was developed by the University of Delaware Center for Energy and Environmental Policy, with a local partner being the Center for Earth, Energy, & Democracy (CEED) at the Institute of Agricultural Trade Policy, Minneapolis, MN. A Sustainable Energy Utility is a community controlled portal for organizing energy efficiency and onsite renewables across sectors (electricity, heating, transportation), tailoring programs and financial mechanisms to the specific needs of end-users. The SEU has been instated in the state of Delaware, Washington DC, and is being considered in Philadelphia, Milan, Minnesota, and the West Side Neighborhood in St. Paul among other locations. See [www.seu-de.org](http://www.seu-de.org) for information.

**From:** SHARON M CORNEJO  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Xcel's Proposed Hiawatha Project  
**Date:** Friday, July 10, 2009 7:47:32 AM

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Xcel's Proposed Hiawatha Project should bury the power lines underground. Why not work in conjunction with the Light Rail Project to share the cost.

Sharon Eiden Cornejo  
3039 Humboldt Ave S  
Minneapolis, MN 55408

**From:** Sue Crolick  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** I am SO worried about Xcel's Hiawatha Project!  
**Date:** Tuesday, June 30, 2009 10:22:13 AM

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Dear Bill,

I am a homeowner who lives next to the Midtown Greenway. The Greenway was my big inspiration for buying my loft 4 years ago! My decks had a great view of this fabulous community resource, and I could walk out my door and hike or bike along the trail.

I also run my nonprofit business from my home, so I have a very intense connection to the Greenway.

And now, I am really worried. The high voltage lines with big towers above my beloved Greenway sound horrible! I am worried about all kinds of things should this project go through ---- loss of my property values, ugliness on our beautiful path, and maybe getting sick because of it.

This project seems like a war between our OLD values and way of doing things, and our NEW values, which I so much want to live by: protecting our environment, cutting back on our energy use, finding NEW sources of energy, choosing ways of getting around without cars.

I will gladly turn off my air conditioner more often. I will live by CANDLELIGHT if I have to! Please consider the impact of what Xcel wants to do on all the people who live along the Greenway, and all the people who WON'T live there if this project happens!

Thank you,

Sue Crolick  
President  
Creatives for Causes / Art Buddies

Phone 612-334-6004  
OR 612-870-5774  
Email [Sue.Crolick@clynch.com](mailto:Sue.Crolick@clynch.com)

Creatives for Causes  
2840 Bryant Ave. S, Suite 405  
Minneapolis, MN 55408



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

**Public Comment Sheet**  
**SCOPING MEETING**  
**Xcel Energy Hiawatha HVTL Project**  
**PUC Docket Number: E002/TL-09-38**

Name:

Julia Eagles

Representing:

Phillips Community Energy Cooperative (PCEC)

Address:

2801 21<sup>st</sup> Ave S, Suite 110  
Minneapolis, MN 55407

Email:

jeagles@phillipsenergycoop.com

Comment:

The PCEC is an urban energy cooperative that exists to significantly lower energy costs and increase the use of clean energy throughout the Phillips community. We're housed in the ~~Green~~ Phillips Eco Enterprise Center, a model green building located at 2801 21<sup>st</sup> Avenue, across Hiawatha Avenue from the proposed Hiawatha Substation site. The PCEC has operated on a <sup>Conservation Improvement Program</sup> contract with Xcel Energy ~~through~~ through the MN Dept. of Commerce Office of Energy Security. We would like to see increased conservation efforts, the consideration of distributed renewable energy generation and implementation of Smart Grid technology (of which Xcel is the primary promoter) addressed in the EIS as a part of the alternatives. Considering the new requirements under the Next Generation Energy

Please submit comments to meeting moderator or send to:

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

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

→  
OVER



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](http://www.commerce.state.mn.us)

### Comments Continued:

Act for utilities in the state of Minnesota to increase their energy efficiency & conservation programs to reduce energy sales by 1.5%, it seems that expanding energy efficiency programs in this community should be considered as an alternative to these high voltage lines. Also, since the state of MN has a goal of producing 15% of the state's energy from renewable sources, it seems that this project would be an opportunity to pilot a distributed renewable generation project in the community. And as Xcel Energy is currently leading the shift towards Smart Grid in our electrical transmission <sup>systems</sup> with their pilot project in Boulder, Colorado, it seems that this project would be an opportunity to further develop this technology. Rather than building antiquated technology like high voltage transmission lines & substations, we could invest that \$28.4 million in increased conservation programs, renewable energy development and Smart Grid transmission, it seems we could provide reliable and consistent power to this community that would serve us far into the future. We're interested in working with Xcel Energy and the Office of Energy Security to address this issue and seek a more sustainable solution. With a Certificate of Need on this project that demonstrates the projected electricity needs for this <sup>service</sup> ~~region~~ area we could more effectively propose and design alternative solutions to address the future energy needs of the community.

The Phillips Community has a history of taking a proactive response to environmental justice issues in the neighborhoods, to propose more sustainable and forward-thinking projects (such as the Green Institute and the Midtown Greenway) and hope that we can work with Xcel and the Office of Energy Security to do the same for this project.

**From:** Doug DeMers  
**To:** [bill.storm@state.mn.us](mailto:bill.storm@state.mn.us);  
**Subject:** High Voltage Line planned for the Greenway  
**Date:** Wednesday, June 17, 2009 7:46:01 AM

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The Greenway, I always thought of as a means of travel that people used and felt was given over to nature...putting this in will change it. It will be more like the Electric-way...

My biggest question is why?

This passage has been here a long time, even before it became a wonderful bike trail, why now?

What is it for?

The only thing I see is an easy cheap way for the electric company...

How does this benefit the people who use it for exercise and transport to and from work?

There are many homes and businesses that will be living under these lines, what are the health dangers?

The first part of the page talks about the governor cutting money...

How come there's money for this? Is it private money?

Concerned Citizen

**From:** [Sarah Dietrich](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** X-cel"s expansion plans  
**Date:** Friday, July 10, 2009 11:49:37 AM

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Hi-

As a resident of Longfellow who drives along Hiawatha and uses the Greenway I am adamantly against this substation. The area along Hiawatha is not very attractive north of Lake St. The recent clean up of the area slated for the substation, the Sabo bridge, Targets remodel have come a long way to change that. Most of the drunks, industrial trash, etc is gone. These improvements have gone a long way to improving the greenway & the recreational activities it attracts. As you know the light rail is an important part of our city now. This is all visible from the train & presents our city in a positive way.

A substation in the midst of all this will destroy this long, hard fought improvement to our neighborhood.

Thank You for your consideration-

--

Sarah Dietrich  
3038 30th Ave S  
Minneapolis, MN 55406

612-721-3009

**From:** Jan DeNoble  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Xcel Energy Hiawatha Transmission Line Project  
**Date:** Wednesday, July 01, 2009 4:58:20 PM

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Dear Mr. Storm:

I am writing to urge that the proposed Xcel Energy Hiawatha transmission lines be buried underground. I understand that my preferred route for burying them along either E. 31st St. or E. 26th St. is not being considered, so of the choices proposed, I favor burying the lines along E. 28th St.--even though doing so would lead to major construction a few yards from my home.

I live at 2749 10th Ave. S., just two houses from 28th St. and about a block from the entrance to the Midtown Greenway. I've been both amazed and thrilled to see the increased popularity of the Greenway over the past few years, and I believe it would be a great disservice not only to the Greenway users but to the community as a whole to disrupt this wonderful asset. The Midtown Phillips area has undergone a tremendous revival in the 30-plus years I've lived here, and the Greenway is now contributing greatly to this revival. To "litter" it with ugly above-ground power lines is unconscionable, and to dig up the new landscaping and interfere with its increased usage, in order to bury the lines underground, is both foolish and counterproductive to the interests of the community.

Above-ground power lines are just plain ugly. It's my understanding that they're also the way of the past, not the way of the future. I don't want to look at them along 28th St., and I'm sure no one else wants them on their street either. So--to the powers making this decision--please bury these lines, ideally along a lesser used street like 31st., or if not there, along 26th or 28th.

Thank you for allowing this input. If you'd like to contact me, my phone number is 612-870-1014; my address is 2749 10th Ave. S., Mpls., 55407.

Jan DeNoble



## Improvement Coalition

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
Saint Paul, Minnesota, 55101-2198  
[Bill.storm@state.mn.us](mailto:Bill.storm@state.mn.us)

July 9, 2009

Dear Mr. Storm:

Since the East Phillips Community will be one of the hosts to the brunt of whatever challenges attend Xcel Energy's proposed Hiawatha Transmission Project, members of the East Phillips Improvement Coalition (EPIC), the citizen participation organization for this area, are concerned that the EIS Scope address particular issues. We have followed the Midtown Greenway Coalition's list of requests for study with alterations of our own as well as listing particular additional concerns of our own.

### A. GENERAL DESCRIPTION OF THE PROPOSAL

#### 1. Purpose of the Purposed Transmission Line. v

- *The EIS should explain what is meant in the Application by possible expansion of the Hiawatha substation to accommodate 345 kV line as referenced on p. 17 of the Route Permit Application ("Application").*
- *The EIS should explain how the 115 kV Hiawatha Project line fits in with other projected lines in south Minneapolis. This includes a proposed line from the Midtown Substation (referred to as the Oakland Substation in the South Minneapolis Load-Serving Study, paragraph 7.5.20 of the Transmission Project Report 2007) extending west and south to a new proposed substation near Hwy 62 and Nicollet Avenue and then on to a final termination at a new Penn Lake Substation near I-494 and Sheridan Avenue, and a new 345 kV line connecting from the Hiawatha Substation to a new substation near Highway 280 (referred to by an Xcel representative in the draft meeting minutes of the July 24, 2008 meeting of the Northern MAPP SPG Meeting, paragraph 7.1.4).*
- *The EIS should discuss the proposed location and timing of related South Minneapolis load serving projects and why the Hiawatha Project is being segmented out from other such projects. The EIS should also discuss the "ultimate design capacity" and costs of the Hiawatha Project, including staging intended through 2023 according to the Project Need Document. (see Application, Appendix D, p. 55).*

#### 2. Regulatory Framework

### 3. Project Location and Setting

- Given statements in the Application that outages and load concerns have been under review for ten years (e.g. Application, Appendix D, p. 3), the EIS should review and make public upkeep and expenditure data regarding the existing seriously aged and possibly obsolete transmission system and the aged transformers in the Phillips and surrounding area in comparison with other more affluent parts of town to determine whether part of the perceived need for a new system comes from outages due to a failure to spend the requisite funding in a timely way to upgrade the current system.

- Given the location and setting, near what the City and the surrounding neighborhoods had hoped would provide an economic and development boost to Phillips and near by neighborhoods, the EIS should provide an economic analysis of the potential financial loss suffered by the community from above-ground lines and some of the possible substation locations, given the negative impact on future development which will be suffered for many years to come. This would involve a comparison of initial cost to bury the lines versus long term economic loss of development dollars, property values and possible loss of close proximity population. A survey of the Midtown Exchange population of condo owners may be in order to help determine this. This request seeks to determine whether the initial rate increase is dramatically off-balanced by the potential long term tax and other financial losses which would come from failing to bury the lines.com.

- Given these same statements in the Application that outages and load concerns have been under review for ten years (e.g. Application, Appendix D, p. 3), the EIS should explain why the 115 kV Hiawatha Project transmission line was not proposed for underground installation in the Lake Street right-of-way when it was reconstructed over the last three years.

- The EIS should also provide ten years worth of data regarding electricity used by each feeder line from each substation serving the Focused Study Area with enough detail to show days and times of day when peak loads were experienced, and an analysis of when electricity supply or quality problems were reported.

- The EIS should also identify where in Minnesota comparable 115 kV high voltage power lines have been installed both above and below ground in areas of similar street width and urban density, including downtown and residential urban core areas.

### 5. Description of Alternative Routes

#### Route A - Underground

- Conduct an examination of the possible use of the south slope of the Greenway, using information supplied by Kandiyohi, Inc.'s work on the Midtown EcoEnergy Biomass Plant of a possible accessible pathway in that area researched by their earlier project.

#### Route B

- Review intense Community opposition from surrounding residents due to Little Earth of United Tribes' new home owner project extending along 26<sup>th</sup> Street and other resident concerns.

#### Route C

#### Route D

- The EIS should explain Applicant's proposal for location of the underground Route D within the "sidewalk area" of the 28<sup>th</sup> Street right-of-way (Application, p. 105) and describe alternative locations within that right-of-way which might mitigate impacts to trees and residents.

- Review intense Community opposition from surrounding residents to sidewalk location and economic implications.

Midtown Substation - East  
 Hiawatha Substation - South

6. Description of Alternatives to the Proposed Project  
 Transmission/Distribution Alternatives  
 Generation Alternatives  
 Load Management/Conservation Alternatives

- *The EIS should evaluate alternatives to the 115 kV Hiawatha Project as a bundle with each contributing part of the power reductions or new power needed, rather than isolating them and stating that each by itself cannot serve the need.*
- *The EIS should review transmission/distribution alternatives, including a scaled back Hiawatha Project with one new substation and feeder lines going out from it, rather than the proposed HVTLs connecting two new substations. Also, if existing distribution lines can be upgraded to result in better power supply, this should be studied as well.*
- *When looking at generation alternatives, the EIS should include at a minimum, combined heat and power for large commercial users, and photovoltaic panels, with battery storage if needed to match peaks in load.*
- *When looking at load management/conservation, the EIS should include utility grade batteries that could store power at night, best practices nationwide regarding conservation, and application of Smart Grid technology.*
- *Conservation, distributed generation, combined heat and power and Smart Grid technology should also be evaluated in the EIS to mitigate impacts of the proposed Hiawatha Project and preclude the need for 345 kV ultra high voltage transmission expansion in the future in connection with this project. Various levels of combined demand reduction and distributed generation should be described in the EIS.*
- *The EIS should assess greenhouse gas emissions related to increased levels of energy consumption with the Hiawatha Project as compared to a bundled alternative focused on conservation, demand management, and distributed generation including combined heat and power, renewables, and other sources.*

B. IMPACTS AND MITIGATIVE MEASURES

1. Human Settlements

- *The EIS should study impacts on property values for existing buildings of each alternative route, including but not limited to reductions in property tax revenues over a 30-year period as compared to a no-Hiawatha Project scenario.*
- *The EIS analysis of impacts on human settlements (and land use as noted below) should include not only the loss in value to existing residential and commercial land use, but also consideration of impacts on potential new developments using projections, based on discussions with Minneapolis CPED staff and other economic and housing development experts, of reductions in property tax*

revenues and job development to the City of Minneapolis and Hennepin County resulting from implementation of each route alternative.

- The EIS should explicitly discuss environmental justice aspects of each alternative to the proposed project, including blighting impacts in low-income communities and communities of color who have already experienced a disproportionate share of negative environmental impacts related to visual blight.

- The EIS should especially review intense Community opposition from surrounding residents due to Little Earth of United Tribes' new Home Owner Project extending along 26<sup>th</sup> Street. Above or even below ground transmission lines would seriously blight the optimism, hope and primarily the economic success of this crucial project for this underserved population. The impact of this should be carefully reviewed.

## 2. Noise

- The EIS should contain explicit information regarding noise decibels from each aspect of the proposed Hiawatha Project, including substations, under worst-case weather conditions. For Xcel's "preferred" alternative, noise impacts to walkers or cyclists immediately adjacent or beneath the 115 kV line should be explicitly analyzed.

## 3. Aesthetics

- The EIS should study the impact of above ground alternatives on Midtown Greenway trail users as well as local residents.

- The EIS should evaluate the aesthetic impacts of the proposed Hiawatha and Midtown Substations, including the removal of trees and shrubs and the views of the Hiawatha Substation from the Sabo Bridge and LRT as a gateway to Minneapolis.

- Specific alternatives to mitigate aesthetic impacts of the Hiawatha Project including analysis of alternative substation locations, replacement of plantings removed or impaired by the HVTLs and substations, public art and alternative substation designs should be described in the EIS.

## 4. Recreation

- The EIS should analyze the adverse recreational, cultural and land use impacts to users of the Midtown Greenway and nearby residents who consider the Greenway to be a linear park as well as a unique recreation, transportation and land use resource. Such analysis should consider impacts on all recreational purposes such as running, walking, in-line skating, gardening, and special community events.

- The EIS should explicitly consider the impacts of construction of either of the alternative A routes (overhead or underground) and the lack of fungible alternatives for users if the Greenway is not accessible.

- The EIS should also evaluate the conditions for Route A above and below ground options, including proximity to distribution lines and other considerations that could result in shocks to bicyclists, as has been reported by bicyclists who have ridden on bikeways under HVTLs elsewhere.

- *The EIS should discuss the potential loss of public open space as a result of substation alternatives and explicitly identify locations within affected South Minneapolis communities where replacement open space could be provided to mitigate adverse impacts of the Hiawatha Project.*

## 5. Transportation

- *The EIS should study how the Route A overhead and underground lines may limit or prohibit reconfiguring the Midtown Greenway corridor to accommodate rail transit alongside the cycling and walking trails and access points to station platforms down in the Greenway, which is the long-term plan for the Greenway according to its owner, the Hennepin County Regional Railroad Authority.*
- *The EIS should also study the impacts of proposed Route A alternatives on multimodal transportation, including bicycle, pedestrian, in-line skating and other transportation served by the Greenway, such as discouraging use or limiting trail access opportunities.*

## 6. Land Use

- *The EIS should study for each proposed alternative the negative impacts on implementation of the Midtown Greenway Land Use and Development Plan that recommends increasing building density in the project area. In this analysis, negative impacts on developer activity due to overhead or underground lines along the Midtown Greenway should be discussed as well as impacts on residential land use if alternatives B or C are considered.*
- *The EIS should consider Route A impacts on the Midtown Greenway as a linear park and evaluate overhead lines as inconsistent with the corridor's current and future land use plans.*
- *The EIS should also consider more than eight years of community planning and volunteer work that has gone into planning and implementation of the green space at the proposed Hiawatha Substation location. The EIS should include a specific discussion of ways to mitigate any loss of green space by replacement within the community with green space with comparable location and value to the community.*

## 7. Prime Farmland

- *The EIS should explicitly recognize that applicable rules may incompletely identify the impacts of HVTLs on urban, as contrasted with rural locations. Urban economic development, community green space, urban tree plantings and linear trails have comparable substantial value in urban communities.*

## 8. Soils and Geology

## 9. Flora

- *The EIS should include analysis of trees removed for the HVTLs and substations, discuss alternative locations within various route alternatives (including the center-street location for Alternative D mentioned previously) to minimize loss of trees, and provide a detailed and specific analysis of impacts on tree cutting and pruning needed for above-ground alternatives.*

## 10. Fauna

## 11. Archaeological and Historic Features

- *The EIS should detail the impacts of each route on historical places either listed on the historical register or which have the potential to be so listed.*

- *The EIS should also detail, for each route, including Xcel's "preferred" above ground route along the Midtown Greenway, each applicable permit, law and policy pertaining to altering or impacting a location on the national register of historical places. (See Application, Appendix E, p.12). The EIS should specifically discuss applicable legal standards for feasible and prudent alternatives where protected historical resources may be impaired by a proposed project.*

## 12. Air Quality

## 13. Surface Water

## 14. Wetlands

## 15. Human Health and Safety

## Electric and Magnetic Fields (EMF)

## Stray Voltage

- *The EIS should analyze for each alternative, the impacts of electric and magnetic fields resulting from above ground and underground alternatives, including milligauss/microTesla exposure at specified distances from 115 kV transmission. The number of homes, residents and a break-down by age should be identified. For alternative D, impacts of a location at the center of the street should be compared with an edge of sidewalk location.*

- *Current peer reviewed and international literature pertaining to EMF should be included in the EIS assessment of EMF, including but not limited to the following resources: D. Carpenter et al, "Setting Prudent Public Health Policy for Electromagnetic Field Exposures," Reviews on Env. Health, Vol. 23, No. 2, 2008; "BioInitiative Report: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields," August 31, 2007 ([www.bioinitiative.org/report/index.htm](http://www.bioinitiative.org/report/index.htm))*

- *The EIS should include in its analysis possible negative health impacts from charged aerosol particles resulting from the elevated electric and/or magnetic fields and the impact of magnetic fields on pace-makers and other medical electronic devices.*

- *The EIS should explicitly discuss environmental justice aspects of each alternative to the proposed project, including health risks to low-income communities and communities of color who have already experienced a disproportionate share of negative environmental health impacts related to soil and air pollution including decreased use of bike trails which would impact health. Cumulative impacts of health risks from EMF should be considered along with other environmental health risks in the communities affected by the proposed Hiawatha Project.*

## 16. Potential for radio, television and cell phone interference from transmission lines

- *In addition to consideration of radio and television interference from transmission lines, the EIS should also evaluate for each proposed alternative the potential for interference with electronic devices used by bicyclists such as computers with odometers, speedometers, GPS.*

*ADD A NEW ITEM #17. Efficiency in Expenditure/Reduced Likelihood of Expanded High Voltage Transmission to Serve Local Load*

*• The EIS should include a discussion of load management, conservation, distributed generation and smart grid technology (see A.6 above) as a way to ensure that expenditure for the Hiawatha Project remains effective for South Minneapolis load serving on a long-term basis and to mitigate human and environmental impacts of potential subsequent transmission expansion projects.*

5.0 ALTERNATIVES TO BE ADDRESSED IN THE EIS

At this time the OES EFP staff is not recommending that any additional routes, other than those presented in Xcel Energy's HVTL Route Permit Application, be evaluated in the EIS.

*• The EIS should also evaluate a high voltage transmission route alternative that would follow Interstate highway corridors and reduce impacts to densely developed residential and commercial areas, such as a route from the existing Hiawatha Avenue transmission line east along I-94 and south along I-35W.*

East Phillips Improvement Coalition board and members appreciate the opportunity to comment on the scope of the EIS and your consideration of the above suggestions. Please keep us informed as we move through this process.

Sincerely,

Carol Pass, President  
East Phillips Improvement Coalition  
2536 18<sup>th</sup> Avenue S.  
Minneapolis, MN, 55404  
612-280-8418  
cpass@runbox.com



2834 10<sup>th</sup> Avenue South  
Greenway Level, Suite 2  
Minneapolis, MN 55407  
612 879-0103  
612 879-0103 (fax)  
[www.midtowngreenway.org](http://www.midtowngreenway.org)

June 26, 2009

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
Saint Paul, Minnesota, 55101-2198  
[bill.storm@state.mn.us](mailto:bill.storm@state.mn.us)

RE: XCEL ENERGY HIAWATHA TRANSMISSION PROJECT  
PUC DOCKET #E002/TL-09-38

Dear Mr. Storm:

Below please find the comments of the Midtown Greenway Coalition regarding the scoping of the Environmental Impact Statement ("EIS") for Xcel Energy's proposed Hiawatha Transmission Project. We have identified for each of our proposed additions to the EIS Scope the section of the Draft Scoping Document outline to which it pertains. Under "B. Impacts and Mitigative Measures," the items we recommend for study should apply to all above ground and below ground routes and substation alternatives unless stated otherwise.

#### A. GENERAL DESCRIPTION OF THE PROPOSAL

##### 1. Purpose of the Purposed Transmission Line.

- *The EIS should explain what is meant in the Application by possible expansion of the Hiawatha substation to accommodate 345 kV line as referenced on p. 17 of the Route Permit Application ("Application").*
- *The EIS should explain how the 115 kV Hiawatha Project line fits in with other projected lines in south Minneapolis. This includes a proposed line from the Midtown Substation (referred to as the Oakland Substation in the South Minneapolis Load-Serving Study, paragraph 7.5.20 of the Transmission Project Report 2007) extending west and south to a new proposed substation near Hwy 62 and Nicollet Avenue and then on to a final termination at a new Penn Lake Substation near I-494 and Sheridan Avenue, and a new 345 kV line connecting from the Hiawatha Substation to a new substation near Highway 280 (referred to by an Xcel representative in the draft meeting minutes of the July 24, 2008 meeting of the Northern MAPP SPG Meeting, paragraph 7.1.4).*

- *The EIS should discuss the proposed location and timing of related South Minneapolis load serving projects and why the Hiawatha Project is being segmented out from other such projects. The EIS should also discuss the “ultimate design capacity” and costs of the Hiawatha Project, including staging intended through 2023 according to the Project Need Document. (see Application, Appendix D, p. 55).*

## 2. Regulatory Framework

## 3. Project Location and Setting

- *Given statements in the Application that outages and load concerns have been under review for ten years (e.g. Application, Appendix D, p. 3), the EIS should explain why the 115 kV Hiawatha Project transmission line was not proposed for underground installation in the Lake Street right-of-way when it was reconstructed over the last three years.*

- *The EIS should also provide ten years worth of data regarding electricity used by each feeder line from each substation serving the Focused Study Area with enough detail to show days and times of day when peak loads were experienced, and an analysis of when electricity supply or quality problems were reported.*

- *The EIS should also identify where in Minnesota comparable 115 kV high voltage power lines have been installed both above and below ground in areas of similar street width and urban density, including downtown and residential urban core areas.*

## 5. Description of Alternative Routes

Route A - Underground

Route B

Route C

Route D

- *The EIS should explain Applicant’s proposal for location of the underground Route D within the “sidewalk area” of the 28<sup>th</sup> Street right-of-way (Application, p. 105) and describe alternative locations within that right-of-way which might mitigate impacts to trees and residents.*

Midtown Substation - East

Hiawatha Substation - South

## 6. Description of Alternatives to the Proposed Project

Transmission/Distribution Alternatives

Generation Alternatives

Load Management/Conservation Alternatives

- *The EIS should evaluate alternatives to the 115 kV Hiawatha Project as a bundle with each contributing part of the power reductions or new power needed, rather*

*than isolating them and stating that each by itself cannot serve the need.*

- The EIS should review transmission/distribution alternatives, including a scaled back Hiawatha Project with one new substation and feeder lines going out from it, rather than the proposed HTVLS connecting two new substations. Also, if existing distribution lines can be upgraded to result in better power supply, this should be studied as well.*
- When looking at generation alternatives, the EIS should include at a minimum, combined heat and power for large commercial users, and photovoltaic panels, with battery storage if needed to match peaks in load.*
- When looking at load management/conservation, the EIS should include utility grade batteries that could store power at night, best practices nationwide regarding conservation, and application of Smart Grid technology.*
- Conservation, distributed generation, combined heat and power and Smart Grid technology should also be evaluated in the EIS to mitigate impacts of the proposed Hiawatha Project and preclude the need for 345 kV ultra high voltage transmission expansion in the future in connection with this project. Various levels of combined demand reduction and distributed generation should be described in the EIS.*
- The EIS should assess greenhouse gas emissions related to increased levels of energy consumption with the Hiawatha Project as compared to a bundled alternative focused on conservation, demand management, and distributed generation including combined heat and power, renewables, and other sources.*

## **B. IMPACTS AND MITIGATIVE MEASURES**

### **1. Human Settlements**

- The EIS should study impacts on property values for existing buildings of each alternative route, including but not limited to reductions in property tax revenues over a 30-year period as compared to a no-Hiawatha Project scenario.*
- The EIS analysis of impacts on human settlements (and land use as noted below) should include not only the loss in value to existing residential and commercial land use, but also consideration of impacts on potential new developments using projections, based on discussions with Minneapolis CPED staff and other economic and housing development experts, of reductions in property tax revenues and job development to the City of Minneapolis and Hennepin County resulting from implementation of each route alternative.*
- The EIS should explicitly discuss environmental justice aspects of each alternative to the proposed project, including blighting impacts in low-income communities and communities of color who have already experienced a disproportionate share*

*of negative environmental impacts related to visual blight.*

## 2. Noise

- *The EIS should contain explicit information regarding noise decibels from each aspect of the proposed Hiawatha Project, including substations, under worst-case weather conditions. For Xcel's "preferred" alternative, noise impacts to walkers or cyclists immediately adjacent or beneath the 115 kV line should be explicitly analyzed.*

## 3. Aesthetics

- *The EIS should study the impact of above ground alternatives on Midtown Greenway trail users as well as local residents.*
- *The EIS should evaluate the aesthetic impacts of the proposed Hiawatha and Midtown Substations, including the removal of trees and shrubs and the views of the Hiawatha Substation from the Sabo Bridge and LRT as a gateway to Minneapolis.*
- *Specific alternatives to mitigate aesthetic impacts of the Hiawatha Project including analysis of alternative substation locations, replacement of plantings removed or impaired by the HVTLs and substations, public art and alternative substation designs should be described in the EIS.*

## 4. Recreation

- *The EIS should analyze the adverse recreational, cultural and land use impacts to users of the Midtown Greenway and nearby residents who consider the Greenway to be a linear park as well as a unique recreation, transportation and land use resource. Such analysis should consider impacts on all recreational purposes such as running, walking, in-line skating, gardening, and special community events.*
- *The EIS should explicitly consider the impacts of construction of either of the alternative A routes (overhead or underground) and the lack of fungible alternatives for users if the Greenway is not accessible.*
- *The EIS should also evaluate the conditions for Route A above and below ground options, including proximity to distribution lines and other considerations that could result in shocks to bicyclists, as has been reported by bicyclists who have ridden on bikeways under HTVLs elsewhere.*
- *The EIS should discuss the potential loss of public open space as a result of substation alternatives and explicitly identify locations within affected South Minneapolis communities where replacement open space could be provided to mitigate adverse impacts of the Hiawatha Project.*

## 5. Transportation

- *The EIS should study how the Route A overhead and underground lines may limit or prohibit reconfiguring the Midtown Greenway corridor to accommodate rail transit alongside the cycling and walking trails and access points to station platforms down in the Greenway, which is the long-term plan for the Greenway according to its owner, the Hennepin County Regional Railroad Authority.*
- *The EIS should also study the impacts of proposed Route A alternatives on multimodal transportation, including bicycle, pedestrian, in-line skating and other transportation served by the Greenway, such as discouraging use or limiting trail access opportunities.*

## 6. Land Use

- *The EIS should study for each proposed alternative the negative impacts on implementation of the Midtown Greenway Land Use and Development Plan that recommends increasing building density in the project area. In this analysis, negative impacts on developer activity due to overhead or underground lines along the Midtown Greenway should be discussed as well as impacts on residential land use if alternatives B or C are considered.*
- *The EIS should consider Route A impacts on the Midtown Greenway as a linear park and evaluate overhead lines as inconsistent with the corridor's current and future land use plans.*
- *The EIS should also consider more than eight years of community planning and volunteer work that has gone into planning and implementation of the green space at the proposed Hiawatha Substation location. The EIS should include a specific discussion of ways to mitigate any loss of green space by replacement within the community with green space with comparable location and value to the community.*

## 7. Prime Farmland

- *The EIS should explicitly recognize that applicable rules may incompletely identify the impacts of HVTLS on urban, as contrasted with rural locations. Urban economic development, community green space, urban tree plantings and linear trails have comparable substantial value in urban communities.*

## 8. Soils and Geology

## 9. Flora

- *The EIS should include analysis of trees removed for the HVTLS and substations, discuss alternative locations within various route alternatives (including the center-street location for Alternative D mentioned previously) to minimize loss of trees,*

*and provide a detailed and specific analysis of impacts on tree cutting and pruning needed for above-ground alternatives.*

10. Fauna

11. Archaeological and Historic Features

- *The EIS should detail the impacts of each route on historical places either listed on the historical register or which have the potential to be so listed.*
- *The EIS should also detail, for each route, including Xcel's "preferred" above ground route along the Midtown Greenway, each applicable permit, law and policy pertaining to altering or impacting a location on the national register of historical places. (See Application, Appendix E, p.12). The EIS should specifically discuss applicable legal standards for feasible and prudent alternatives where protected historical resources may be impaired by a proposed project.*

12. Air Quality

13. Surface Water

14. Wetlands

15. Human Health and Safety

Electric and Magnetic Fields (EMF)

Stray Voltage

- *The EIS should analyze for each alternative, the impacts of electric and magnetic fields resulting from above ground and underground alternatives, including milligauss/microTesla exposure at specified distances from 115 kV transmission. The number of homes, residents and a break-down by age should be identified. For alternative D, impacts of a location at the center of the street should be compared with an edge of sidewalk location.*
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- *The EIS should include in its analysis possible negative health impacts from charged aerosol particles resulting from the elevated electric and/or magnetic fields and the impact of magnetic fields on pace-makers and other medical electronic devices.*

*• The EIS should explicitly discuss environmental justice aspects of each alternative to the proposed project, including health risks to low-income communities and communities of color who have already experienced a disproportionate share of negative environmental health impacts related to soil and air pollution including decreased use of bike trails which would impact health. Cumulative impacts of health risks from EMF should be considered along with other environmental health risks in the communities affected by the proposed Hiawatha Project.*

16. Potential for radio, television and cell phone interference from transmission lines

*• In addition to consideration of radio and television interference from transmission lines, the EIS should also evaluate for each proposed alternative the potential for interference with electronic devices used by bicyclists such as computers with odometers, speedometers, GPS.*

*ADD A NEW ITEM #17. Efficiency in Expenditure/Reduced Likelihood of Expanded High Voltage Transmission to Serve Local Load*

*• The EIS should include a discussion of load management, conservation, distributed generation and smart grid technology (see A.6 above) as a way to ensure that expenditure for the Hiawatha Project remains effective for South Minneapolis load serving on a long-term basis and to mitigate human and environmental impacts of potential subsequent transmission expansion projects.*

5.0 ALTERNATIVES TO BE ADDRESSED IN THE EIS

At this time the OES EFP staff is not recommending that any additional routes, other than those presented in Xcel Energy's HVTL Route Permit Application, be evaluated in the EIS.

*• The EIS should also evaluate a high voltage transmission route alternative that would follow Interstate highway corridors and reduce impacts to densely developed residential and commercial areas, such as a route from the existing Hiawatha Avenue transmission line east along I-94 and south along I-35W.*

We appreciate the opportunity to comment on the scope of the EIS and your consideration of the above suggestions.

Sincerely,



Tim Springer  
Executive Director, Midtown Greenway Coalition



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

**Public Comment Sheet**  
**SCOPING MEETING**  
**Xcel Energy Hiawatha HVTL Project**  
**PUC Docket Number: E002/TL-09-38**

Name:

Representing:

Vicky Erickson

Address:

Email:

2821 28<sup>th</sup> Ave. S., Mpls., MN 55406

Comment:

I live next to the Greenway. The corridor was a blight prior to the creation of the green space. Years were spent by residents & community organizations working tirelessly to create one of the only amenities in our low to moderate income & high percentage of people of color. I'm horrified that Xcel wants to ruin what is so precious to the people here. It is a slap in the face. The power lines should be buried & they should be located off the Greenway in a low-residence area.

Please submit comments to meeting moderator or send to:

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

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

**From:** [Thea Evans](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** proposed high voltage lines on Greenway  
**Date:** Monday, June 22, 2009 11:36:55 AM

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Hi Bill,

Although I was unable to attend the meeting last Thursday, I would like to submit comments about the proposed power lines and distribution station on the midtown greenway. My name is Thea Evans, and I live at 2821 39th Avenue South, one block south of the midtown greenway. I bike the greenway frequently to get to friends houses, events and shopping in the mid town area, and my twelve year old son bikes to school every day on the midtown greenway. The greenway is a huge asset to our community, and makes biking so much safer and more fun than biking on the street. I'm concerned that running high voltage power lines along the greenway will ruin the beauty and safety of the greenway. I will be much less likely to use the greenway if it is a corridor for high voltage lines. I enjoy biking the greenway because it is a greenway, not an industrial zone. I also feel that the property values both for residents and businesses along the greenway will be diminished by the power lines. I'm concerned that this will lead to a downward spiral where people will use the greenway less, there will be fewer residents and businesses to keep an eye on things, and the greenway will be less safe for bikers. High voltage lines will make the greenway a blight on our neighborhoods rather than the wonderful asset it is today.

Sincerely,  
Thea Evans

--

Thea Evans  
[paintedturtle@ftml.net](mailto:paintedturtle@ftml.net)



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

**Public Comment Sheet**  
**SCOPING MEETING**  
**Xcel Energy Hiawatha HVTL Project**  
**PUC Docket Number: E002/TL-09-38**

Name:

Les Everett

Representing:

Self

Address:

1988 Brewster St. #109  
St. Paul, MN 55108

Email:

everett023@umn.edu

Comment:

I am an Xcel customer and 100% ~~member~~ <sup>subscriber</sup> to Wind Power.  
I strongly oppose high power lines along the Greenway  
overhead. I frequently bike this route and do not  
want to spend my exercise and recreational time  
along such a power line. It is hard enough to  
escape the built environment, and that line would make  
it much less welcoming. This is probably a 40-year  
installation - do it right!!

Please submit comments to meeting moderator or send to:

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

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

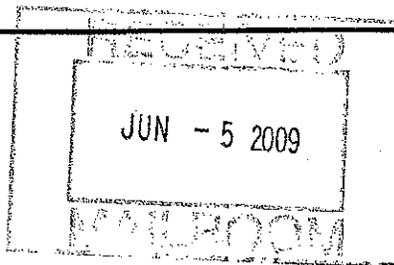


# Phillips West Neighborhood Organization

Father Jogues Eplé, Vice Chair  
2400 Park Avenue, Suite 157  
Minneapolis, MN 55404  
Phone 612-879-5383

4 June 2009

William Cole Storm, Project Director  
Minnesota Department of Commerce  
7<sup>th</sup> Place E. #500  
St. Paul MN 55101.2198



Dear Mr. Storm –

This is in gratitude for your work, *Briefing, The Hiawatha Project*, (THP) I received it by the courtesy of Dr. Haar. I am not writing as a Board member. Rather as an adult educator from doctoral studies at the University of Chicago, where the Community Organizer in Chief taught after my time. .

I listened to the 21 May *Hearing*. Then, I spoke nervously. Three bright women I admire wonder why I am writing you? Crystal, PWNO, Julia, PCEC and Amanda, MGC are skilled leaders among us.. My purpose is to clear the smoke and generate more light on THP. Just the fear of THP power lines here – merely thinking about THP leads to a cartoon octopus with crackling arms strangling Phillips. Cf. *The Alley* on the back of this letter.

How about considering **educative circles**? We can run a pilot here, *The Center for Changing Lives* (LSS). We could invite everyone, both cowboys and Ojibwe,- OES, Xcel, MnPUC, PWNO, PCEC, MGC and LSS. At *Little Earth circle* a young woman spoke while her baby nursed. She drew everyone's attention. Am I leaping too far ahead? I was presuming your approval of **circles**.

Alternative, your time may be better spent with State Rep. Karen Clark. Karen is our wise, articulate representative on your side of The River who know Phillips better than I. Or, you may wish to pilot a circle here. Then too, as *The Talmud* teaches, there is always a third possibility. Thirdly, we can drop **circles**.

To wrap up, **MnDOC, Xcel and MnPUC are circling their wagons - I am respectfully advocating for educative circles - before the sparks from Xcel's Hiawatha Project - further inflame the Phillips neighborhood.**

Cordially if quixotically -- [fatherjogues@yahoo.com](mailto:fatherjogues@yahoo.com)

- Fr. Jogues 4/6  
09

Cc: Crystal, Julia, Amanda, \*Karen, OES, Xcel, MnPUC *et alii*, including LSS and *The Alley*.

Father Jogues Epple  
2523 Portland Avenue South  
Apt. 2210  
Minneapolis, Minnesota 55404

RECEIVED  
JUN 11 2009

June 11, 2009

William Cole Storm, Project Director  
Minnesota Department of Commerce  
7th Place East, #500  
St. Paul, Minnesota 55101-2198

Dear Mr. Storm,

A week from today, OED and Xcel will speak at the Midtown Global Market just a few blocks from here. As you know they will be speaking about the Hiawatha Project. In our Phillips neighborhood there are 19,805 souls according to the 2000 Census. Among us there are many activists who are deeply concerned about the project. Many are more able to speak for us than I. For my part, I see no need to attend the meeting.

If you read my June 4th letter, you understand why I am stunned by what you are doing. I continue to believe that:

- The Hiawatha Project is folly.
- "Hiawatha" is a character from Longfellow's fiction. It is my hope you will consult with a real person. We have a wise, very real and articulate woman who represents us on your side of the river. I hope you will consult with State Representative Karen Clark (District 61A).
- The Hiawatha project is vastly too risky. Enron and Wall Street have shown all too well how to make profit from risk. If Xcel is to maintain the 23 percent profit margin it did in 2007, it will have to take risks. It is these risks that allow so-called executive compensation that amounts to virtual pots of gold.
- Women are clearly not risk-averse. The Harvard research studies known as *In Her Own Voice* suggests that women are more circumspect, more responsible by nature to steal Xcel's line. So, why are there so few female voices among you who are making decisions?

I do not know by what measure of success you will measure next week's meeting. For me, if the people of our neighborhood speak truth to the power you represent, I will be pleased.

Cordially,

Father Jogues Epple 6/6/09

cc: PWNO, PCEC, MGC, Xcel, MN DOC, MNPUC, LSS, the Alley

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 = Garrett Ferderber

County = Hennepin County

City = Minneapolis

Email = dykeboy23@yahoo.com

Phone =

Impact: = Dear fellow Minnesotans,  
I am extremely concerned with Excel Energy's proposal to string High Voltage Transmission lines along the midtown greenway corridor. I am an electrician by trade and so appreciate the need for a reliable and high flow power source for businesses and residences. However, the fact that Excel's only semi-realistic option is to carry these lines through a highly populated and highly valuable piece of urban real estate is extremely troubling.

It is obvious that the project would have a profound and negative impact on the future development of the Greenway, which is one of only a few urban corridors, which could house future mass transit that were not utterly destroyed by freeways and other developments. Businesses and real estate gains that have been made near lake would also be severely impacted by the proposed installation... There is a real concern that HVTL's have deadly long-term health consequences for those who live near them. People do not want to buy houses near them or run businesses near them.

What is not so obvious is that this could set a precedent for future power lines. If Excel is not willing to even discuss safer options, we have no options. Burying the lines in shielded conduit is one option, but that would also compromise development of the Greenway. What are the other options that Excel is not giving us? Can we allow a company's profit margins to engineer our cities and neighborhoods?

I urge that we require Excel to submit other options or consider other options that we propose. Stringing HVTLs around any residential neighborhood in this city is not a realistic option.

Thank you for your consideration.

Sincerely,  
Garrett Ferderber

Mitigation = \*Reduced and distributed generation must be considered as an alternative to the Hiawatha power lines.  
\*Lines must go underground, with costs borne by Xcel Energy, not by the City of Minneapolis.



Office of Energy Security  
85 7<sup>th</sup> Place East  
Suite 500  
St. Paul, MN 55101  
**Attention Moderator: William Storm (MDOC)**

**Public Comment Sheet  
Scoping Meeting  
Xcel Energy Hiawatha HVTL Project  
PUC Docket Number: E002/ TL-09-38**

**Name:** Perry Firkus

**Representing:** Crew2, Inc.

**Address:** 2650 Minnehaha Ave S  
Minneapolis, MN 55406

**Email:** [Perry.Firkus@thecrew2.com](mailto:Perry.Firkus@thecrew2.com)

**Comment:**

Impacts to Community (Hiawatha Substation Alternative—East)

Crew2, Inc. was established in 1986, located in Roseville, Minnesota, and was courted to Minneapolis approximately seven years ago. Crew2 chose to move to the city as a response to the Minneapolis Community Planning and Economic Development plan; intended to revitalize the commercial corridors and create sustainable, livable wage jobs in the City of Minneapolis. Since its relocation in February 2003, it has created approximately one hundred jobs locally, additionally; it employs another fifty people in five branch offices (Madison, Milwaukee, Kansas City, Indianapolis, and Omaha), has contracts with nearly five hundred LLC, Inc. organizations, and provides services in at least eleven states. Its Minneapolis office is headquarters for this operation and continues to grow amidst the recent, economic downturn. Altering its ability to operate will inevitably impact the city, the organization, its employees, the local community and the environment.

If Xcel energy is allowed to develop a substation on the lot labeled "Hiawatha East", Crew2 will be challenged for its land by way of "imminent domain". If by all means necessary, Crew2 is required to leave its current location it will not retain an alternate location within City limits and will consider its options of relocating to a neighboring state. As a result of this position, it is imperative to formally announce the impacts as a result of Xcel's request to build a substation on land currently occupied by Crew2.

**City**

- Minneapolis will have lost a Corporate Commercial Business, delivering sustainable revenue to the city.
- The City of Minneapolis will lose more livable wage jobs.
- There will be increased demands on already strained state and local resources (Minnesota Temporary Assistance for Needy Families and Unemployment Revenues).

**Organization**

- Crew2 as an organization will not recoup the investment loss in the development of its current commercial headquarters, due to current economic conditions.
- Crew2 will incur additional fiscal costs to relocate a commercial hub of this size to an alternate location.
- Operations will be impacted dramatically during the transitional relocation; eliminating the corporate office will result in the delay of services to nearly 13,000 customers on a monthly basis in at least eleven states. In addition, it will affect support, services, and materials that are supplied to its branch locations.

**Employees**

- As stated above, job loss in the State of Minnesota will be inevitable. Although employees will be given an opportunity to relocate, there will be periods of unemployment during the transition.
- Employees who are impacted will be forced to face concerns of finances, housing, and sustainability for children.

**Community**

- Decrease in property values to surrounding business and housing complexes located in this commercial corridor.
- Decreases in revenue spent with neighborhood business (Buy Seward/ Longfellow: Target Corporation, Rainbow Foods, Fast Food Chains, as well as other commercial businesses in area).
- Impacts to Nonprofits in surrounding communities receiving volunteer hours and financial donations from Crew2 directly; Urban Homeworks (sustainable housing for low income families in Minneapolis), Toys for Tots, Humane Society, local schools, and more.

**Environment**

- Potential loss of green space located on the south end of Crew2's location.
- Potential health concerns for neighboring schools; potential diseases associated with EMF and particles displaced in the air.
- Decreased conservation requirements and lack of renewable energy initiatives explored. City of Minneapolis to receive Federal Stimulus monies within a years time, dedicated for businesses and homeowners to use towards green initiatives. (Crew2 is more than willing to set the tone for potential energy alternatives- solar, wind, etc.)

**Final Statement:** Transmission lines are effective up to ten- twenty miles from origination of generation. In this case, its is Crew2's formal request that the substation location for Hiawatha East be removed from the build with an alternate unoccupied area designated for the substation development, and that all transmission lines associated with this build are placed underground.

**From:** [Katie & Rick Fournier](mailto:Katie & Rick Fournier)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Xcel's Hiawatha project  
**Date:** Wednesday, July 08, 2009 9:06:19 AM

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Dear Mr. Storm:

I am sending the following letter to you by US mail, but wanted to send it to you by e-mail as well.

\*\*\*\*\*

*Katie Fournier*

*912 18<sup>th</sup> Avenue SE*

*Minneapolis, Minnesota*

*55414*

July 8, 2009

William C. Storm

Minnesota Department of Commerce

85 7<sup>th</sup> Place E., # 500

St. Paul, Minnesota 55101

Dear Mr. Storm:

I write in regard to Xcel Energy's plans for a new transmission line in south Minneapolis (the Hiawatha Project).

Although I do not live or work in the immediate neighborhood of the proposed project, I am very concerned about the impact of some of the route and transmission choices on the neighborhood through which it will pass, as well as the impact on the historic fabric of the City of Minneapolis.

The route selection and the disposition of the transmission lines are decisions that will be with us for many years, perhaps as long as a century. Such decisions should be based on more than dry measures of cost to the company and its shareholders, or even its ratepayers. These decisions must also weigh the effect on residents, workforce, and visitors to the general area of the transmission lines. The historic and residential nature of this area has a value which would be changed (and not for the better) by the addition of highly visible, industrial-sized towers and power lines along residential streets.

**Fifty and one hundred years from now our descendants will praise the decision makers of today for making the difficult choice to place these lines underground. This is a decision that**

can encourage the redevelopment of the area by honoring its historic presence, if it is made with concern for the future of those who live, work, or invest in the neighborhood, and for those who love the neighborhood.

Thank you for your attention to my concerns.

Sincerely,

•

Katie Fournier [kandrournier@msn.com](mailto:kandrournier@msn.com)

cc: Council Member Robert Lillegren, Commissioner Peter McLaughlin



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

**Public Comment Sheet**  
**SCOPING MEETING**  
**Xcel Energy Hiawatha HVTL Project**  
**PUC Docket Number: E002/TL-09-38**

Name:

Representing:

Jessica Friedrichs

Mistown Exchange Condos  
on the Greenway

Address:

Email:

2900 11th Ave, S, #401  
Mpls, MN 55407

friedrichs.j@hotmail.com

Comment:

We, at the Mistown Exchange Condos, are new to the area. Our building was built a few years ago on 29th street between 10th and 11th. We are on Xcel's "preferred rate" or Rate A. It is heartbreaking to think that our building's view could possibly become Xcel's transmission lines. We are all joining together to stop this from happening to our homes. We have been working hard to make this community a better place to live. We will certainly not stop now.

Please submit comments to meeting moderator or send to:

(turn over)

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

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



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:

If this project is a "go" on 29th & Route A):

- ① It must be underground
  - the cost for "above ground" on Park A is \$28.4 million
  - for the underground - we need Allina, Wells Fargo, and the Global Market to come together and work the cost difference - from above ground to underground.
  - if not all of the money can be raised Xcel must help fund the underground project.

② Please consider those of us living on 29th who take pride in our view and location on the Greenway.

Thank you.

For me (personally) I would be living with a large pole outside my unit blocking my wonderful view of the Greenway. I am directly on the corner of 29th and 11th I bought my unit knowing that across the street is the on/off ramp to the Greenway and nothing would block my view. Xcel's project is changing all this.

**From:** [Amy Gaalswyk](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** EIS for Xcel Hiawatha Project  
**Date:** Thursday, July 09, 2009 8:49:58 AM

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Dear Bill,

I am writing regarding the Environmental Impact Statement for Xcel Energy's proposed Hiawatha Project. As a longtime member of the Midtown Greenway Coalition, I am concerned about the effect this project would have on the Greenway environment. The Greenway is a treasured amenity serving South Minneapolis, and it took many long years to establish as the quiet and scenic walking/biking corridor it is today. If high-voltage power lines were placed along the Greenway, this would very negatively impact users' enjoyment of the trail, and possibly their health. The EIS for the Hiawatha Project should take into consideration all the work that has been done to establish this green corridor cutting through the heart of the city and just how much that work would be set back by the addition of the new power lines. One of the things that makes Minneapolis special is the value we place on our parks and trails; we need to continue to fight to protect them!

Think of the uproar there would be if a power company proposed mounting such power lines through New York's Central Park or San Francisco's Golden Gate Park. The Midtown Greenway may not be so large and high-profile a green space, but it is still valued by the adjacent communities and the many bikers it serves for recreational and commuting purposes. The EIS should consider the negative impact the power lines would have on the quality of all of these people's lives, as the power lines would degrade the overall quality of the Greenway as a natural space.

Thank you for taking the time to read this message.

Sincerely,

Amy Gaalswyk  
Minneapolis

**From:** Sean Gosiewski  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Xcel Energy Hiawatha - Sean Gosiewskis comments PUC DOCKET #E002/TL-09-38  
**Date:** Thursday, July 09, 2009 7:02:15 PM

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July 8 2009

To- Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7th Place East, Suite 500  
Saint Paul, Minnesota, 55101-2198  
[bill.storm@state.mn.us](mailto:bill.storm@state.mn.us)

From - Sean Gosiewski, Block Club Leader  
3132 22nd Ave S  
Minneapolis, MN 55407  
612-729-3828  
[sustainability@visi.com](mailto:sustainability@visi.com)

Dear Mr. Storm,

The corcoran, powderhorn and phillips neighborhoods are just barely hanging onto our property values. The Midtown Exchange building and midtown greenway, and the Midtown YWCA are really helping to revitalize our community.

We are excited that new housing is being planned in our area at hiawatha and lake.

Please make sure that any new major power lines are burried underground to enhance our urban tree canope, pedestrian and bike access and the ability to attract new higher income residnets with new condo projects near the LRT.

Why did'nt you burry the power line when lake street was being re-done over the past 3 years?

I am also working with my neighbors and church members to reduce our energy use by 20% or more with the MN Energy Challenge and Xcel's quick fix program.

I also agree with all the comments of the Midtown Greenway coalition.

THANKS

Sean Gosiewski and Rachel Hefte

RE: XCEL ENERGY HIAWATHA TRANSMISSION PROJECT  
PUC DOCKET #E002/TL-09-38

Dear Mr. Storm:

Below please find the comments of the Midtown Greenway Coalition regarding the scoping of the Environmental Impact Statement (“EIS”) for Xcel Energy’s proposed Hiawatha Transmission Project. We have identified for each of our proposed additions to the EIS Scope the section of the Draft Scoping Document outline to which it pertains. Under “B. Impacts and Mitigative Measures,” the items we recommend for study should apply to all above ground and below ground routes and substation alternatives unless stated otherwise.

#### A. GENERAL DESCRIPTION OF THE PROPOSAL

##### 1. Purpose of the Purposed Transmission Line.

- *The EIS should explain what is meant in the Application by possible expansion of the Hiawatha substation to accommodate 345 kV line as referenced on p. 17 of the Route Permit Application (“Application”).*
- *The EIS should explain how the 115 kV Hiawatha Project line fits in with other projected lines in south Minneapolis. This includes a proposed line from the Midtown Substation (referred to as the Oakland Substation in the South Minneapolis Load-Serving Study, paragraph 7.5.20 of the Transmission Project Report 2007) extending west and south to a new proposed substation near Hwy 62 and Nicollet Avenue and then on to a final termination at a new Penn Lake Substation near I-494 and Sheridan Avenue, and a new 345 kV line connecting from the Hiawatha Substation to a new substation near Highway 280 (referred to by an Xcel representative in the draft meeting minutes of the July 24, 2008 meeting of the Northern MAPP SPG Meeting, paragraph 7.1.4).*
- *The EIS should discuss the proposed location and timing of related South Minneapolis load serving projects and why the Hiawatha Project is being segmented out from other such projects. The EIS should also discuss the “ultimate design capacity” and costs of the Hiawatha Project, including staging intended through 2023 according to the Project Need Document. (see Application, Appendix D, p. 55).*

##### 2. Regulatory Framework

##### 3. Project Location and Setting

- *Given statements in the Application that outages and load concerns have been under review for ten years (e.g. Application, Appendix D, p. 3), the EIS should explain why the 115 kV Hiawatha Project transmission line was not proposed for underground installation in the Lake Street right-of-way when it was reconstructed over the last three years.*
- *The EIS should also provide ten years worth of data regarding electricity used by each feeder line from each substation serving the Focused Study Area with enough detail to show days and times of day when peak loads were experienced, and an analysis of when electricity supply or quality problems were reported.*
- *The EIS should also identify where in Minnesota comparable 115 kV high voltage power lines have been installed both above and below ground in areas of similar street width and urban density, including downtown and residential urban core areas.*

## 5. Description of Alternative Routes

Route A - Underground

Route B

Route C

Route D

- *The EIS should explain Applicant's proposal for location of the underground Route D within the "sidewalk area" of the 28<sup>th</sup> Street right-of-way (Application, p. 105) and describe alternative locations within that right-of-way which might mitigate impacts to trees and residents.*

Midtown Substation - East

Hiawatha Substation - South

## 6. Description of Alternatives to the Proposed Project

Transmission/Distribution Alternatives

Generation Alternatives

Load Management/Conservation Alternatives

- *The EIS should evaluate alternatives to the 115 kV Hiawatha Project as a bundle with each contributing part of the power reductions or new power needed, rather than isolating them and stating that each by itself cannot serve the need.*
- *The EIS should review transmission/distribution alternatives, including a scaled back Hiawatha Project with one new substation and feeder lines going*

out from it, rather than the proposed HTVLS connecting two new substations. Also, if existing distribution lines can be upgraded to result in better power supply, this should be studied as well.

- *When looking at generation alternatives, the EIS should include at a minimum, combined heat and power for large commercial users, and photovoltaic panels, with battery storage if needed to match peaks in load.*
- *When looking at load management/conservation, the EIS should include utility grade batteries that could store power at night, best practices nationwide regarding conservation, and application of Smart Grid technology.*
- *Conservation, distributed generation, combined heat and power and Smart Grid technology should also be evaluated in the EIS to mitigate impacts of the proposed Hiawatha Project and preclude the need for 345 kV ultra high voltage transmission expansion in the future in connection with this project. Various levels of combined demand reduction and distributed generation should be described in the EIS.*
- *The EIS should assess greenhouse gas emissions related to increased levels of energy consumption with the Hiawatha Project as compared to a bundled alternative focused on conservation, demand management, and distributed generation including combined heat and power, renewables, and other sources.*

## B. IMPACTS AND MITIGATIVE MEASURES

### 1. Human Settlements

- *The EIS should study impacts on property values for existing buildings of each alternative route, including but not limited to reductions in property tax revenues over a 30-year period as compared to a no-Hiawatha Project scenario.*
- *The EIS analysis of impacts on human settlements (and land use as noted below) should include not only the loss in value to existing residential and commercial land use, but also consideration of impacts on potential new developments using projections, based on discussions with Minneapolis CPED staff and other economic and housing development experts, of reductions in property tax revenues and job development to the City of Minneapolis and Hennepin County resulting from implementation of each route alternative.*
- *The EIS should explicitly discuss environmental justice aspects of each*

*alternative to the proposed project, including blighting impacts in low-income communities and communities of color who have already experienced a disproportionate share of negative environmental impacts related to visual blight.*

## 2. Noise

- The EIS should contain explicit information regarding noise decibels from each aspect of the proposed Hiawatha Project, including substations, under worst-case weather conditions. For Xcel's "preferred" alternative, noise impacts to walkers or cyclists immediately adjacent or beneath the 115 kV line should be explicitly analyzed.*

## 3. Aesthetics

- The EIS should study the impact of above ground alternatives on Midtown Greenway trail users as well as local residents.*
- The EIS should evaluate the aesthetic impacts of the proposed Hiawatha and Midtown Substations, including the removal of trees and shrubs and the views of the Hiawatha Substation from the Sabo Bridge and LRT as a gateway to Minneapolis.*
- Specific alternatives to mitigate aesthetic impacts of the Hiawatha Project including analysis of alternative substation locations, replacement of plantings removed or impaired by the HVTLs and substations, public art and alternative substation designs should be described in the EIS.*

## 4. Recreation

- The EIS should analyze the adverse recreational, cultural and land use impacts to users of the Midtown Greenway and nearby residents who consider the Greenway to be a linear park as well as a unique recreation, transportation and land use resource. Such analysis should consider impacts on all recreational purposes such as running, walking, in-line skating, gardening, and special community events.*
- The EIS should explicitly consider the impacts of construction of either of the alternative A routes (overhead or underground) and the lack of fungible alternatives for users if the Greenway is not accessible.*
- The EIS should also evaluate the conditions for Route A above and below ground options, including proximity to distribution lines and other*

*considerations that could result in shocks to bicyclists, as has been reported by bicyclists who have ridden on bikeways under HTVLS elsewhere.*

- The EIS should discuss the potential loss of public open space as a result of substation alternatives and explicitly identify locations within affected South Minneapolis communities where replacement open space could be provided to mitigate adverse impacts of the Hiawatha Project.*

## 5. Transportation

- The EIS should study how the Route A overhead and underground lines may limit or prohibit reconfiguring the Midtown Greenway corridor to accommodate rail transit alongside the cycling and walking trails and access points to station platforms down in the Greenway, which is the long-term plan for the Greenway according to its owner, the Hennepin County Regional Railroad Authority.*

- The EIS should also study the impacts of proposed Route A alternatives on multimodal transportation, including bicycle, pedestrian, in-line skating and other transportation served by the Greenway, such as discouraging use or limiting trail access opportunities.*

## 6. Land Use

- The EIS should study for each proposed alternative the negative impacts on implementation of the Midtown Greenway Land Use and Development Plan that recommends increasing building density in the project area. In this analysis, negative impacts on developer activity due to overhead or underground lines along the Midtown Greenway should be discussed as well as impacts on residential land use if alternatives B or C are considered.*

- The EIS should consider Route A impacts on the Midtown Greenway as a linear park and evaluate overhead lines as inconsistent with the corridor's current and future land use plans.*

- The EIS should also consider more than eight years of community planning and volunteer work that has gone into planning and implementation of the green space at the proposed Hiawatha Substation location. The EIS should include a specific discussion of ways to mitigate any loss of green space by replacement within the community with green space with comparable location and value to the community.*

## 7. Prime Farmland

- *The EIS should explicitly recognize that applicable rules may incompletely identify the impacts of HVTLs on urban, as contrasted with rural locations. Urban economic development, community green space, urban tree plantings and linear trails have comparable substantial value in urban communities.*

## 8. Soils and Geology

## 9. Flora

- *The EIS should include analysis of trees removed for the HTVLs and substations, discuss alternative locations within various route alternatives (including the center-street location for Alternative D mentioned previously) to minimize loss of trees, and provide a detailed and specific analysis of impacts on tree cutting and pruning needed for above-ground alternatives.*

## 10. Fauna

## 11. Archaeological and Historic Features

- *The EIS should detail the impacts of each route on historical places either listed on the historical register or which have the potential to be so listed.*
- *The EIS should also detail, for each route, including Xcel's "preferred" above ground route along the Midtown Greenway, each applicable permit, law and policy pertaining to altering or impacting a location on the national register of historical places. (See Application, Appendix E, p.12). The EIS should specifically discuss applicable legal standards for feasible and prudent alternatives where protected historical resources may be impaired by a proposed project.*

## 12. Air Quality

## 13. Surface Water

## 14. Wetlands

## 15. Human Health and Safety

Electric and Magnetic Fields (EMF)  
Stray Voltage

• The EIS should analyze for each alternative, the impacts of electric and magnetic fields resulting from above ground and underground alternatives, including milligauss/microTesla exposure at specified distances from 115 kV transmission. The number of homes, residents and a break-down by age should be identified. For alternative D, impacts of a location at the center of the street should be compared with an edge of sidewalk location.

• Current peer reviewed and international literature pertaining to EMF should be included in the EIS assessment of EMF, including but not limited to the following resources: D. Carpenter et al, "Setting Prudent Public Health Policy for Electromagnetic Filed Exposures," Reviews on Env. Health, Vol. 23, No. 2, 2008; "BioInitiative

Report: A

Rationale for a  
Biologically-based  
Public Exposure  
Standard for

Electromagnetic  
Fields,

" August

31, 2007 (

www.

bioinitiative.org/

report/index.htm)

• The EIS should include in its analysis possible negative health impacts from charged aerosol particles resulting from the elevated electric and/or magnetic fields and the impact of magnetic fields on pace-makers and other medical electronic devices.

• The EIS should explicitly discuss environmental justice aspects of each alternative to the proposed project, including health risks to low-income communities and communities of color who have already experienced a disproportionate share of negative environmental health impacts related to soil and air pollution including decreased use of bike trails which would impact health. Cumulative impacts of health risks from EMF should be considered along with other environmental health risks in the communities affected by the proposed Hiawatha Project.

16. Potential for radio, television and cell phone interference from transmission lines

• In addition to consideration of radio and television interference from transmission lines, the EIS should also evaluate for each proposed alternative

*the potential for interference with electronic devices used by bicyclists such as computers with odometers, speedometers, GPS.*

*ADD A NEW ITEM #17. Efficiency in Expenditure/Reduced Likelihood of Expanded High Voltage Transmission to Serve Local Load*

*• The EIS should include a discussion of load management, conservation, distributed generation and smart grid technology (see A.6 above) as a way to ensure that expenditure for the Hiawatha Project remains effective for South Minneapolis load serving on a long-term basis and to mitigate human and environmental impacts of potential subsequent transmission expansion projects.*

5.0 ALTERNATIVES TO BE ADDRESSED IN THE EIS

At this time the OES EFP staff is not recommending that any additional routes, other than those presented in Xcel Energy's HVTL Route Permit Application, be evaluated in the EIS.

*• The EIS should also evaluate a high voltage transmission route alternative that would follow Interstate highway corridors and reduce impacts to densely developed residential and commercial areas, such as a route from the existing Hiawatha Avenue transmission line east along I-94 and south along I-35W.*

We appreciate the opportunity to comment on the scope of the EIS and your consideration of the above suggestions.

Sincerely,

**From:** [mgreen58@gmail.com](mailto:mgreen58@gmail.com)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**cc:** [paul.ostrow@ci.minneapolis.mn.us](mailto:paul.ostrow@ci.minneapolis.mn.us); [cam.gordon](mailto:cam.gordon);  
**Subject:** Xcel Proposal for Powerlines in Phillips Neighborhoods  
**Date:** Friday, July 10, 2009 9:27:36 AM

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Dear Mr. Storm,

I am writing today to express my opposition to the current proposal(s) for adding overhead powerlines and sub-station(s) in the Phillips neighborhoods.

I reside on the 2800 block of 16th Avenue South and would be directly impacted by the proposal. I am concerned for safety/health reasons and economic reasons; the proposal would certainly have a negative impact on the value of my property.

Having overhead power in, near or crossing the Greenway is not consistent with the intent of the Greenway and would have a negative impact on development along the Greenway.

The need for additional power is largely the result of commercial development in the area. Specifically, Allina and Xcel have created their own problem and now seem to want to solve it on the backs of Phillips residents.

The failure to anticipate the need for additional power when the hyper development of the Allina campus was approved is a failure on the part of Allina, Minneapolis Community Development and Xcel. Failure to have done the proper needs analysis shouldn't result in a fast tracked solution that works for Xcel and Allina, but is detrimental to the residential community and inconsistent with the vision and current development of the Greenway.

I urge your office to reject this proposal.

Thank you for your time and consideration.

**From:** C. Ryan Griffith  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** RE: Xcel Energy Hiawatha HVTL project  
**Date:** Wednesday, July 01, 2009 6:39:36 PM

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Bill,

Thank you for hosting the public information meeting on 18 June at Midtown. You did an excellent job dealing with all the people who did not want to be considerate and follow the rules.

I am not sure precisely what comment is applicable to your study, but as a resident of Phillips West and a homeowner (2601 Columbus Ave), I am concerned about Xcel's planned transmission lines. My preference (though I know it is the costliest) would be for the line to be run underground along the midtown greenway. While the underground route would require more disturbance and congestion during construction, the Greenway route would seem to present the fewest traffic challenges for the neighborhood. I am an avid user of the greenway and don't see how an underground routing of the transmission line would decrease its value. Additionally, as a homeowner and resident at 2601 Columbus, the proposed overhead route on 26th would be an extreme concern for me in terms of its environmental impact (by which I mean health and aesthetics - not ecological). Running the transmission lines along 26th above ground would have significant impact on residents already stressed by the expansion of Children's hospital, Chicago Ave construction and increased congestion on 26th. The impact on property values as well as potential health concerns would be significant.

I hope this is what you are looking for - let me know if I can clarify or if there is another forum to which I should send these comments.

Thank you again,

Ryan

## MEMORANDUM

**TO:** Bill Storm, Project Manager  
**FROM:** Peter McLaughlin, Chair - Hennepin County Regional Railroad Authority  
Mark Stenglein, Hennepin County Commissioner  
**RE:** Scoping Comments of the Hennepin County Railroad Authority and Hennepin County  
**DATE:** July 10, 2009

**In the Matter of the Northern States Power company HVTL Route Permit  
Application  
PUC Docket Number: E002/TL-09-38**

Due to the significant effects that placement of overhead transmission lines will have on the dense urban area in which the project is proposed, Hennepin County and the Hennepin County Regional Railroad Authority have identified eight factors for study in the Scoping Document prepared for the Environmental Impact Study in this matter. The Hennepin County Regional Railroad Authority and Hennepin County support the placement of the high voltage transmission lines underground and request the additional costs be spread to the five state service area of Xcel.

### **1. Land-Based Economies**

- Commercial Development in the project area has been significant as result of both private and public investments. Between 1999 and 2008, the annual percent estimated market value change for properties within one half mile of Xcel's preferred route was almost always positive (one property declined in value), most often above 20% and frequently above 36%. (City of Minneapolis Assessor's Office, April 2009)
- Between 1999 and 2008, the area within one half mile of Xcel's preferred route along the Midtown Greenway has experienced some of the greatest increases in estimated market value for commercial properties in Minneapolis.
- The Urban Village and Midtown Exchange developments, and at least six other proposed developments approaching \$1 billion in new investments, focus on the public amenities provided by the Midtown Greenway as envisioned by the Midtown Greenway Corridor Framework Plan developed by the Midtown Community Works Partnership, a public private partnership which includes Hennepin County and the City of Minneapolis.
- The project area has seen major investments by Abbott-Northwestern Hospital, Children's Hospital, Wells Fargo Mortgage and other private interests in the Phillips Neighborhood which are part of a major focus of resources and cooperation through the Phillips Partnership, a public private partnership that includes Hennepin County and the City of Minneapolis.

- An unsightly large transmission line placed in a thriving commercial area will likely hinder commercial and residential development and reduce property values.
- The proposed 115kv line is not a distribution line (for which, if placed underground, a surcharge tariff might be appropriate) but a segment of a regional transmission system extending to a broader geographic and economic area which benefits from a thriving Minneapolis economy.
- A tariff for payment of the transmission line, assessed on only Minneapolis businesses, would not only place an unfair burden on Minneapolis businesses but would further impede development and place Minneapolis businesses at a competitive disadvantage with other businesses in the region and likely harm the greater economic region.

## 2. Residential Development (Human Settlements)

- Residential home values have increased dramatically in the project area as a result of both public and private investments. Between 2003 and 2008, the estimated market value change for residences within one half mile of Xcel's preferred route was almost always positive, most often above 16% and frequently above 33%.
- Between 2003 and 2008, the area within one half mile of Xcel's preferred route has experienced some of the greatest increases in estimated market value for residential properties in Minneapolis
- An unsightly large transmission line placed in a thriving residential area will likely substantially reduce property values and quality of life and inhibit further positive residential development.
- As noted above, the proposed line is not a distribution line but a segment of a regional transmission system.
- A tariff assessed on only Minneapolis residents would both place an unfair burden on Minneapolis tax payers and would further impede beneficial residential development.

## 3. Aesthetics

- Hennepin County, City of Minneapolis, Minnesota Department of Transportation and the federal government have spent over 15 million dollars to construct the 5.7 mile Midtown Greenway in a successful effort to make a beautiful urban bike trail. As noted below, the trail goes underneath 16 bridges which were built in 1915 and 1916. Hennepin County and the federal government paid an additional 5 million dollars to construct the Martin Olav Sabo Bridge, the first cable suspension bridge in Minnesota, which spans Hiawatha Avenue. The construction of 1.4 miles of high voltage lines along the Midtown Greenway between Hiawatha Avenue and Oakland Avenue South would significantly detract from the splendor of the Greenway and undo much of beautification efforts by Hennepin County, Minneapolis and other private and public groups. Obviously, above ground, high voltage lines in a residential neighborhood would destroy the residential charm and beauty.

#### 4. Recreation

- The Midtown Greenway is a path used by cyclists, inline skaters, runners and pedestrians. The Greenway was built in three phases between August 2000 and September 2007. The Martin Olav Sabo Bridge was opened by Hennepin County in the fall of 2007.
- In 2007, automatic counters at three locations measured over 1 million bikers along the Midtown Greenway. In the first 6 months of 2008, there were over 657,000 bikers passing those three locations. (*Bicycle Counts for the Midtown Greenway, 2008*).
- Bicycle use is increasing along the corridor at a substantial rate. For the period of March through June, bicycle traffic increased by 25% from 2007 to 2008 (from 449,996 trips in 2007 to 563,688 in 2008, or 113,692 additional trips). For the months of May and June 2008, cycling increased 37% over 2007 levels (from 318,061 in 2007 to 435,430 trips, a difference of 117,369 new trips). (*Bicycle Counts for the Midtown Greenway, 2008*)
- Of the bike paths studied by the City of Minneapolis, the Midtown Greenway bike path has the greatest number of users. The numbers were third overall, only surpassed by two bike lanes of two or three blocks distance on two busy streets near the University of Minnesota. (*Bicycle Counts for the Midtown Greenway, 2008*)
- Bike usage on the Midtown Greenway is greater than the vehicular traffic flow on many Minneapolis streets. (*Bicycle Counts for the Midtown Greenway, 2008*)
- The aesthetic impact of overhead transmission lines would certainly diminish the popularity of this wonderful recreational resource.

#### 5. Transportation

- The Midtown Greenway was acquired by the Hennepin County Regional Railroad Authority (HCRRA) with federal and state assistance for future rail transit use.
- Placement of above ground high voltage transmission lines within the Greenway will interfere with and restrict the options available for future transit uses. Overhead power line infrastructure such as pole foundations and retaining walls would severely impede and limit options for development of light rail transit line infrastructure, including station platforms, retaining walls and transit substations, and related transit oriented development along the Midtown Greenway.
- The Midtown Greenway bikeway was funded with federal Transportation Equity Act and Intermodal Surface Transportation and Efficiency Act (ISTEA), state, county and city funds, and developed in a manner that is consistent with the County's long term vision to have rail transit coexist with the bikeway and walking paths. The Midtown Greenway provides bicycle commuters with a traffic-free east and west route that leads to street bike lanes going from South Minneapolis to Downtown Minneapolis.
- Construction of an overhead high voltage line along the Greenway is inconsistent with the policy of promoting the Greenway as an attractive

alternative to motor vehicle transportation and as a catalyst for economic development.

#### 6. Green Space Land Use

- The Greenway provides significant green space on the borders of the bike path. The Midtown Community Works Partnership has designated this area as green space consistent with the century old plan to connect the lakes in western Minneapolis to the Mississippi River.
- As noted by the Office of Energy Security (OES), the Minneapolis Park and Recreation Board has 15 properties (including Powderhorn Park and Stewart Park) within .5 miles of the project.
- As noted by OES, there are three community gardens (Prairie Oaks Community Garden at 2600 Oakland Avenue South, 12<sup>th</sup> and 13<sup>th</sup> Avenue Block Club Garden, Shalom Garden and Walker Church Community Garden at 3104 16<sup>th</sup> Avenue South) within the project area.
- Xcel's preferred and alternate overhead routes pass through or near the bike path, parks, gardens and lovely residential homes.
- Overhead transmission lines will diminish the charm and beauty of the Greenway, parks and residential neighborhoods and substantially harm property values.

#### 7. Historic Features

- The Greenway is listed on the National Register of Historic Places as a Historic District (Chicago Milwaukee and St. Paul Railroad Grade Separation Historic District) which affords it special protections under both federal and state law against adverse impacts which must be avoided or mitigated. The two primary historical structures in the Greenway are the earthen trench, which extends from Humboldt Avenue South to within 200 yards of Hiawatha Avenue South, and the bridges. The trench is approximately 22 feet deep and has a steeply sloped wall, on both the north and south boundary, along much of the Greenway. Construction on the trench began in 1912. 28 of the 37 original reinforced concrete street bridges spanning the depressed railroad corridor are contributing structures to the Historic District. 16 of those 28 bridges are located along Xcel's preferred route between Hiawatha Avenue and Oakland Avenue South. These Historic Bridges were built between 1915 and 1916 and include: Oakland Avenue Bridge, Park Avenue Bridge, Columbus Avenue Bridge, Chicago Avenue Bridge, Elliot Avenue Bridge, Tenth Avenue Bridge, Eleventh Avenue Bridge, Twelfth Avenue Bridge, Thirteenth Avenue Bridge, Fourteenth Avenue Bridge, Fifteenth Avenue Bridge, Bloomington Avenue Bridge, Sixteenth Avenue Bridge, Seventeenth Avenue Bridge, Eighteenth Avenue Bridge and Cedar Avenue Bridge.
- Placement of large, modern and imposing above ground high voltage transmission lines within the Historic District would adversely impact and be incompatible with the historic character of 1912-1916 time period for which

the District has been preserved. The only means by which this adverse impact can be effectively mitigated is underground placement of the transmission line in a manner that does not adversely impact the underground structure that supports the District.

#### 8. **Human Health and Safety**

- Under Minneapolis City Code, chapter 99.850, the City has announced a goal of placing all electric lines underground. Chapter 99.850 reads:

**Purpose.** The city council finds that it is in the public interest and necessary in order to promote and preserve the general welfare, assure the orderly development of the city and provide for the safety and convenience of its inhabitants, that all existing overhead distribution systems and transmission lines of electrical and communication utilities be eliminated as soon as possible and that distribution lines and systems used in the supplying of electric, communication or similar associated services be placed, constructed and installed underground.

The city engineer shall annually review with the utilities the progress made towards accomplishing this goal.

- Xcel's proposed overhead lines are not only inconsistent with Minneapolis City policy but conflict with the promotion of the general welfare and the orderly development, safety and convenience of the Minneapolis inhabitants living near the project area.

**From:** [phcreate@aol.com](mailto:phcreate@aol.com)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Xcel  
**Date:** Thursday, July 09, 2009 9:04:47 PM

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Mr. Storn--

The Environmental Impact Statement for Xcel's Proposed Hiawatha Project should pay attention to the neighborhood through which it will travel and be sited: poor, with very high incidences of asthma and other health issues. The proposed route would greatly diminish the value of one of the prime vehicles for redevelopment: the Greenway. If Xcel truly needs the new line--which has not been proven--let them put it under ground. The cost should be theirs.

Rev. Patrick Cabello Hansel  
St. Paul's Lutheran Church  
2742 15th Ave S  
Minneapolis, MN 55407

**From:** [Doug Hill](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Regarding Xcel Energy's proposed Hiawatha Project  
**Date:** Friday, July 03, 2009 10:49:09 AM

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It's hard to put a value on how important the Midtown Greenway is to our community. Unfortunately the Lake Street corridor has historically had the inaccurate reputation statewide as where to get drugs and prostitutes. With the opening of the Midtown Commons and the Midtown Greenway that reputation has changed and the corridor is now something us long time residents can brag about. Anything that diminishes this revival of our community is a bad idea. In particular high voltage power lines could stop positive changes to our area and reverse all the good work that has been done here.

Thanks  
Doug Hill  
3209 Chicago Ave  
Minneapolis MN 55407

**From:** [Apache](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Johnson Thu Jul 9 17:22:13 2009 E002/TL-09-38  
**Date:** Thursday, July 09, 2009 5:17:30 PM

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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: Hilary Johnson

County: Hennepin County

City: Minneapolis

Email: [hilarygjohnson \(at\) gmail \(dot\) com](mailto:hilarygjohnson@gmail.com)

Phone:

Impact: I live half a block from the proposed line along 29th St. I bought my house here in December 2008 after having rented for years next to Powderhorn Park. I ride a bicycle as my primary transportation, although I own a car, and the Greenway has been part of my commuting route ever since it opened.

The EIS should include information about possible health impacts of the powerline and substations. I am concerned that my health and my family's health will be negatively affected by the powerline. The burden of proof should be high: It is not enough for Xcel to say that high-voltage powerlines haven't been proven to cause health problems - cigarette companies told us for years that their products weren't proven to cause cancer, although there was a correlation. Xcel should have to provide independently verified positive proof of the powerline's safety and that it absolutely does not harm the health of people living nearby.

The environmental and health impacts of the powerline and substations should be considered and studied in concert with other environmental hazards in our neighborhood (arsenic, Bituminous Roadways, garbage transfer station, etc.), and not just on its own. When we live and go about our business in this neighborhood, our bodies are exposed to all these hazards in combination, not in isolation -- the potential effects of combining these different health risks should

be included.

These combined effects should also be included in the context of environmental justice. The demographic makeup of the neighborhood should be highlighted in the EIS, and the EIS should include mention and explanation of these other environmental and health threats. Historically, poor and minority neighborhoods have been exposed to greater pollution and health hazards than more affluent, white neighborhoods -- Phillips is no exception and the EIS should explain this. The EIS should look at other residential neighborhoods where overhead high-voltage powerlines have gone in and where powerlines have been buried instead: The EIS should compare demographic information for these with particular regard for Xcel's record in these matters and see how the company acts in neighborhoods with differing economic backgrounds.

The EIS should study how property values will be affected by the powerline. Again, study other residential neighborhoods affected by overhead and buried powerlines: What were property values before and after the powerlines went in? The EIS should also include statements from developers and homebuyers on their willingness or lack thereof to build or buy homes near overhead high-voltage powerlines, and in particular near the proposed line along 29th St.

I would also like to know why Xcel did not attempt to bury the proposed line under Lake Street when it was under construction recently. This information should be in the EIS.

The EIS should consider the future of transit along the Greenway and how that might be negatively affected by either an overhead or a buried line on 29th St.

The EIS should consider the visual impact on our greenspaces of an overhead line and substations. Will the lines be situated on concrete pads, with the trees and plants along 29th St. being cut down and not replanted? In particular, the EIS should also include environmental impacts of installing a substation in Xcel's preferred location on Hiawatha, where hundreds of trees and shrubs were recently planted, which are now sequestering carbon emissions and filtering storm runoff. These environmental benefits of our greenspaces are not inconsiderable given the urgency of mitigating climate change and of protecting the purity of our groundwater and rivers. The EIS should study how the powerlines could affect efforts to mitigate climate change, especially given the sources of the energy projected to flow through those lines (coal and nuclear, which is NOT carbon-neutral and is non-renewable).

The EIS should also consider the impact on current and potential businesses: One alternate site for the substation is a functioning business that provides jobs in our community. Siting the substation near this business, or near other businesses and residences, could also produce negative health impacts as well

as negative economic impacts. In addition, the installation of overhead lines on 29th St. could preclude any commercial development from ever occurring there, leaving the street an empty wasteland.

I would also like the EIS to address the future of this powerline in relation to other lines that it may connect with at some point. If it does connect with other lines, will Xcel be skirting the rule that requires a certificate of need for lines longer than a certain amount?

The EIS should investigate the feasibility of overhead powerlines on the alternate routes: Is there any precedent for installing overhead high-voltage powerlines on the sidewalks of residential streets? Or is this a specious option that Xcel included in order to make the 29th St. line seem like the only real option?

The EIS should also examine Xcel's financial statements: I want to know Xcel's margin of profit and how it would be affected by Xcel paying to bury the line on any of the routes. When has Xcel chosen to bury lines in the past and how did this decision affect profits then?

Mitigation: The EIS should consider climate change and our changing energy resources and needs. A powerline and substations that transmit energy produced by burning coal has no place in our energy future. Nuclear power is not a long-term energy solution either: The carbon emitted to produce nuclear plants, along with the finite sources for uranium, and its long-term storage and safety problems do not make nuclear an option for our energy future.

Instead, Xcel should help Lake Street businesses, the hospital, and residential rate-payers reduce their use of electricity and generate as much electricity to send back to the grid as possible. Roof-top wind turbines, solar panels, geothermal, and solar water heaters should be commonplace in our neighborhood: This is our energy future. The hospital in particular, with its greater resources and greater need for power, should commit to renewable sources for its energy generation. I am a resident willing to reduce my usage for the greater good, but I need tips and technology to help me. The EIS should look at how a combination of conservation and renewable and clean alternatives could solve the problem instead of a powerline and substations.

Submission date: Thu Jul 9 17:22:13 2009

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:

**From:** Apache  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Holm Thu Jul 9 18:02:23 2009 E002/TL-09-38  
**Date:** Thursday, July 09, 2009 5:57:40 PM

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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: Megan Holm

County: Hennepin County

City: Minneapolis

Email:

Phone:

Impact: Coal and nuclear are not sustainable power sources, and neither is centralized production connected by unhealthy high tension lines. These lines along the midtown greenway are dangerous and squelch the potential positive development and smart growth for the area.

Mitigation: The Lake Street businesses and area hospitals may need more power, but we should all be doing our part to reduce use, and Xcel should be more aggressively educating the public about how to reduce use. We would all be served better, now and in our near future, if Xcel assisted Lake St. businesses and Abbott-Northwestern hospital to PRODUCE clean power, not simply consume it.

I agree with the Midtown Greenway Coalition who promotes forgoing the project altogether through aggressive conservation, site-based electricity generation such as with solar panels and combined heat and power plants, and grid updates such as smart grid.

Submission date: Thu Jul 9 18:02:23 2009

**From:** [Apache](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** Humble Sun Jun 28 21:40:04 2009 E002/TL-09-38  
**Date:** Sunday, June 28, 2009 9:35:36 PM

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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 = Aaron Humble

County = Hennepin County

City = Minneapolis

Email = [humble@cantusonline.org](mailto:humble@cantusonline.org)

Phone = (612) 803-1404

Impact: = These power lines must be buried. If they are not it will halt and perhaps reverse the development along the greenway and further cripple the South Whittier/North Lyndale neighborhood. This neighborhood is still reeling from the unbelievably idiotic decision to close Nicollet and build Kmart 30 years ago. This will be a final nail in the coffin of my neighborhood and I will hold Xcel responsible for the decline of my property values. This is 2 miles south of downtown. Would this be considered if it were Kenwood and not Lyndale/Whittier? I highly doubt it. Please don't do this to my neighborhood.

Mitigation = Bury the power lines. Period.

Submission date = Sun Jun 28 21:40:04 2009

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)

**From:** Aaron Humble  
**To:** Bill.Storm@state.mn.us;  
**Subject:** Greenway Power Lines  
**Date:** Sunday, June 28, 2009 9:32:30 PM

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Hello,

I'm a resident of the Lyndale neighborhood who would like to express his concern about these new power lines. Unfortunately my job kept me out of town during the community meetings on this topic. The Greenway is bringing a renaissance of development to the Whittier and Lyndale neighborhood and this will halt if these power lines are not buried. As a resident who lives one block off the Greenway my property values will be negatively affected and I will hold Xcel responsible for this decline in my property values.

I hope that the city is smart enough to require that these lines be buried. As a board member for a 150 member Condo Association I will, if necessary, be organizing people in the Lyndale neighborhood to support buried lines. You just can't run high power lines above ground 2 miles south of Downtown. It's unacceptable. What would happen if this were Kenwood instead of Whittier/Lyndale? I don't think I need to follow that thought any further.

Please remember that people live here---please don't do this to our neighborhood.

Sincerely,

Dr. Aaron Humble  
1 West Lake St  
Minneapolis, MN 55408

**From:** [Ralph Jacobson](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** EIS for Xcel  
**Date:** Friday, July 10, 2009 10:54:15 AM

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Bill:

The Environmental Impact Statement for Xcel's Proposed Hiawatha Project should pay attention to the opportunities for conservation, distributed generation, and distributed storage as measures of first resort, not last resort. Xcel Energy made a GREAT presentation to the Solar Cities policy group earlier this year, in which the need for infrastructure upgrade was set into the larger context of bringing some elements of Smart Grid and solar energy to the Central Corridor Utility Transit Zone. It was met with widespread approval, even though some of Xcel's long-time critics were present. My impression was that this same approach would have worked much better when Xcel announced the infrastructure upgrades in Minneapolis. But it's not too late!! I think the EIS process would be a great way to correct this public perception glitch and get on the right track. And the hospitals in the neighborhood represent the perfect opportunity to factor the conservation and RE into the picture.

Thanks for your attention!

Ralph Jacobson  
IPS-Solar  
612-623-3246

**From:** [Mark Jensen](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us)  
**Subject:** Environmental Impact Statement wrt Xcel  
**Date:** Tuesday, July 07, 2009 2:37:27 PM

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Mr. Storm:

I am a resident of South Minneapolis who also uses the Greenway and adjacent bike paths. I am very much opposed to ANY above ground powerlines. we have been working hard for the past decade to improve our neighborhood and to create an optimal balance between commercial and residential interests. The look of the above-ground power lines and the health concerns make that option an absolute -no-go for me. I would much rather pay extra somewhere to put them below ground.

As I said, residents have been working for years to improve the part of town: the Greenway was constructed, Lake Street was redesigned and the street repaved, etc. AND after all this planning and work, Xcel comes in and says we want to blight all you have done with these power lines... where were they when we did all this planning? What is the point of planning is a company can just come in and screwed it up.

blah blah blah -- whatever. I don't speaks up much about things, but this is a big issue for me. Don't let these power lines happen!!!

Mark Jensen  
3237 22nd Ave. S.  
Minneapolis

**From:** [Kirsten Jensen](#)  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** xcel power lines  
**Date:** Thursday, July 09, 2009 1:49:50 PM

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I am writing to oppose the construction of above ground high voltage lines both along the greenway and 31st st. The lines should run underground. There was a good opportunity to do this when Lake st was reconstructed. I knew about the reconstruction at least 5 years before it started, so they did too. The fact that it wasn't done then means that whoever is in charge of this project should be fired. The public should not be punished for Xcel's incompetence. Xcel need to suck it up and do it right now since they couldn't be bothered then.

Kirsten Jensen  
Corcoran resident, Greenway user and pissed off citizen

**From:** Jerry Werle  
**To:** Bill.Storm@state.mn.us;  
**Subject:** No!  
**Date:** Tuesday, June 16, 2009 8:12:28 PM

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To the proposed high voltage energy lines in the Midtown Greenway.  
ARE YOU KIDDING?

We just got the bike trail done, it is seeing immense use and now you  
want to run high voltage power lines through it?

That is such a bad idea, I can not even believe you are considering it.

Carrie Anne Johnson  
1870 E. 26<sup>th</sup> Street  
Minneapolis, MN 55404  
612.281.4399 cell  
greenwarriorbunny@yahoo.com

July 9, 2009

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
Saint Paul, Minnesota 55101-2198  
bill.storm@state.mn.us

RE: XCEL ENERGY HIAWATHA TRANSMISSION PROJECT  
PUC DOCKET #E002/TL-09-38

Dear Mr. Storm:

As a resident of East Phillips, a mother to a 2-yr-old son, a bicyclist-commuter year round for the past 4 years, and as someone who already experiences major health problems due to the toxins and pollutants in the environment, I am outraged at the arrogance and underwhelming lack of conscientiousness of Xcel Energy in presenting this proposal.

According to Xcel's Application, Appendix D.2, Section 2.3, Xcel states that "the analysis of historical load data from 2000 to 2008 reveal two" things. First, that feeder overloads are occurring at an increasing rate in the Focused Study Area. Second, that there is a "general lack of additional capacity at existing area substations to address these overload conditions". Xcel's conclusion is that "absent the installation of additional distribution system capacity", "overloading problems will increase over time." I find Xcel's conclusion egregious, self-serving, callow and inept.

First, this assumption is analogous to one thinking cities can reduce traffic by building more roads. As everyone (hopefully) should know by now, more roads only lead to more traffic. The same applies to current and consumption. Building to a higher capacity only sanctions the consumption of more fossil fuels.

Second, Xcel is assuming that their only responsibility is to deliver power, without any measure of how much is wasted. "We complain about the cost of our energy, but we still throw away most of it. Our power plants, for example, waste enough energy to power Japan."<sup>1</sup> In the highway analogy, this is the same as if Xcel built 3-lane highways, but one of the lanes stopped right over the ocean, and everyone driving just fell right in. This is clearly an unjustifiable loss of limited resources, and unsustainable at that.

Additionally, Xcel (and the EIS) must consider at what total cost we as a society pay to continue sourcing the majority of our energy from coal. From the report "Minnesota Greenhouse Gas Inventory 1990", the "major source of carbon dioxide emissions was fossil fuel combustion (>99%). Of those carbon dioxide emissions from fossil fuel combustion, 79% were attributable to coal use for the utility sector and petroleum use for transportation."

And of course, coal isn't just delivered to the power plant by magic. Nor is it just found while walking in the woods. Irregardless of whether or not the concern over the means of retrieving the coal is of a legal

<sup>1</sup> Grunwald, Michael. TIME, Inc. "America's Untapped Energy Resource: Boosting Efficiency" Wed, Dec. 3, 2008, available at: <http://www.time.com/time/magazine/article/0,9171,1869224-2,00.html>

concern, it certainly should be a moral, ethical and societal concern over what's powering our lights. Xcel's primary source of coal comes from Black Thunder, operated by Thunder Basin Coal Co. LLC., and controlled by Arch Coal, in Gillette, WY. This facility supplies coal from Central Appalachian Strip Mines.

Mountaintop removal is a radical form of coal mining where entire mountains are literally blown up -- devastating communities throughout Appalachia, polluting drinking water and destroying rivers. Over 470 mountains in Appalachia have been destroyed already, with few left. The trees are razed, explosives are set, and machines twenty-stories tall with draglines the size of an SUV scoop up the earth until they reach the coal seams below. The waste is dumped into valleys, covering streams and sensitive first-order ecosystems, and slurries of toxic sludge are injected into old abandoned coal-shafts. The toxic sludge seeps into people's water supplies and their tap comes out red, brown or black -- IF they even have any water left at all. People who drink this water have serious health concerns -- from rashes, headaches, diarrhea to neurological disorders and cancer. Children at the Marsh Fork Elementary School are forced to learn within 300 FEET of a coal silo operated by Massey Energy, an aggressive behemoth of a coal company, which is treated with a chemical spray to keep the coal dust from blowing around. Children attending this school have gotten so sick, that sometimes many of them are vomiting at the same time as each other in the classroom. Please refer to the well-documented book "Coal River" by Michael Shnayerson for more information about these egregious events, as well as many stories about Arch Coal, the controller of the coal company which supplies Xcel Energy.

And I digress...

Xcel's proposal of these HVTLs and Substations in the Midtown District is insensitive at best. Xcel should be well aware of the already overburdened population that resides in this area after the Midtown Burner proposal was stopped by law (MN Statutes, Section 116.07 Subd. 4a), because of the following facts about MY neighborhood:

- 1) It's a Federal EPA Superfund Site;
- 2) A majority of the population are low-income persons of color and American Indians;
- 3) A disproportionate percent of the children have childhood lead poisoning, asthma, or other environmentally-related health problems;
- 4) Has experienced numerous air quality alert-days of dangerous air quality for sensitive populations between Feb. 2007 and Feb. 2008; and
- 5) Is near the junctions of several heavily trafficked state and county highways, and two one-way streets which carry both truck and auto traffic.

There are healthy and sustainable alternatives, which the EIS should analyze, in lieu of Xcel's Hiawatha Project proposal.

The EIS should analyze **Permanent Load Shifting Technologies** as a viable, demonstrable alternative that is currently being offered to business customers via the *Southern California Edison Power Company* (<http://www.sce.com/pls>), as one example. Technologies include Ice-On-Coil technology, Ice Storage Air Conditioning, and Chilled Water Storage. These systems are designed to use energy during non-peak hours to chill water or make ice. The stored medium is then used during on-peak hours to cool buildings via the air conditioning system. The following are three distinct types of thermal energy storage technologies proposed by our approved contractors to permanently shift the energy load to lower rate periods, thereby reducing energy costs.

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- **Chilled Water Storage ("CWS")** — The CWS system includes the design, installation, and operation of storage systems for chilled water so that the building's air conditioning compressors can manufacture and store chilled water during the off-peak hours (generally at night) for use later during the day. During on-peak periods equipment such as smaller pumps and fans operate to circulate the chilled water to condition the spaces with the main compressors turned off, thereby permanently reducing a major portion of air conditioning energy usage and demand from the on-peak period.
- **Ice-on-Coil ("Ice Bank") Storage** — This is a modular TES system that utilizes a chilled water-glycol technology to manufacture ice in an enclosed tank for central air conditioner systems. Using the same TES principle as in chilled water storage, the ice-on-coil system will "charge" the modular tank during the off-peak hours with the electric chillers that would normally operate during the day. The Ice Bank system will manufacture and store ice at night, which will be used during the day to chill the water for air conditioning.
- **Ice Storage Air Conditioning ("ISAC")** — ISAC uses an external ice storage tank to provide the thermal storage for a packaged air conditioner that uses refrigerant, not water, as the cooling medium. The system operates the compressors at night to freeze water in a self-contained storage system to create ice. The ice is then used during the day to cool the refrigerant which in turn is used to air condition the building. The system may be retrofitted in existing packaged central air conditioner systems (usually 5 to 15 tons) or installed as new systems.

Given that the Midtown area has recently seen the expansion of the Allina campus with Abbott Northwestern's new Heart Center, their additional administrative buildings, the very large Wells Fargo Home Mortgage campus, not to mention the very well-lit (and then some) Midtown Global Market. Each of these businesses would be ideal locations for this kind of technology.

By shifting the peak load of high-energy consuming air conditioners at these facilities alone during the summer time, which is precisely when Xcel has stated the current feeder overloads are occurring, I am certain that Xcel would be able to reduce the total consumption of current during these hours, such that the feeder capacity would again be operating below threshold guidelines.

However, this alternative should be considered only in part as a temporary and immediate relief of their concerns, as none of us want to experience feeders blowing up or starting on fire from overload.

Obviously, there are a slew of other alternatives, which should be analyzed, such as wind and solar-powered arrays, not to mention the OES actually enforcing the new Minnesota law whereby \$1 Million dollars are to be reserved for low-income workers on energy efficiency and renewable energy projects.

As to other impacts that the Environmental Impact Statement should address, which are meager in comparison, I offer the following:

The EIS should discuss the possible impacts of a HVTL as it crosses over the Light Rail track at Hiawatha Ave toward the Hiawatha Substation, such as how much current could flow along the LRT track if a downed power line occurred here, and should include the detailed description of its height over this structure to avoid arcing.

The EIS should analyze and detail the decibels of "humming" noise that accompanies HVTLs, as well as the noise generated by substations.

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The EIS should analyze the impacts of bicyclist-commuters, such as myself, who will avoid bicycling anywhere near the HVTL or the Substations, and would instead end up slowing down traffic by continuing to need to bike in a full-lane (as I tow a 2 yr old in a trailer). This would mean avoiding any aboveground route, such as Route A if placed along the Greenway, and on E. 26<sup>th</sup> Street heading west over to Minnehaha to avoid proximity to the EMF and other unknown toxins likely being generated within the substation.

The Environmental Impact Statement must find in conclusion that the impacts of Xcel's Hiawatha Project are FAR too great to grant a permit, and I ask that the Public Utility Commission deny the granting of this permit.

Sincerely,

Carrie Anne Johnson  
A resident of East Phillips

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**From:** Apache  
**To:** [Bill.Storm@state.mn.us](mailto:Bill.Storm@state.mn.us);  
**Subject:** johnson Wed Jul 8 16:33:43 2009 E002/TL-09-38  
**Date:** Wednesday, July 08, 2009 4:29:01 PM

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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: elissa johnson

County: Hennepin County

City: minneapolis

Email: [eliss.uhj@gmail.com](mailto:eliss.uhj@gmail.com)

Phone:

Impact: the power line run is a terrible idea, not only visually but for several safety reasons. i am a daily commuter using the greenway and to have high voltage lines above the path would make it dramatically different for my commute. as i understand there are different options, but it seems as though excel is not actually considering the outcome of any of these options and not creating a viable solution. excel needs to understand that it may be convenient for them to put lines in the direct path of commuters but it is unsafe, unsightly, and not a long term solution for the thousands of travelers the greenway has!

Mitigation: possible solutions may include buried lines along the residential area they were planning as a second option.

Lake street was dug up in the near past: why did excel not take this opportunity to bury lines in the least bothersome area?!

Submission date: Wed Jul 8 16:33:43 2009

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