

Hi Mr. Storm,

Thank you for the opportunity to submit my comments about the scope of the Environmental Review associated with the CON for the Hiawatha Project. We look forward to a real analysis of the actual trends in energy usage in our neighborhoods which has been repeatedly invoked by Xcel as a justification for asking residents of the lowest income, most culturally and linguistically diverse neighborhood in South Minneapolis to bear all the burdens of a project that will benefit a much larger area. We look forward to a complete and thorough analysis of the alternatives to the project considered together as an integrated system.

I want to ask for what seems to me a relatively practical thing that may or may not present some kind of procedural problem for your agency. You and I and many other community members who have been involved in the long process of this permit application, now this certificate of need process, have seen a lot of residents participate in the process in many ways. But often they participate once or twice and do not segment their input in quite the way that the OES segments the process. For example, I think you will agree that there was a lot of opinion about need that area residents expressed during the routing process; that a lot of opinion about the scope of environmental review associated with this project was expressed during the hearings and comment periods for the EIS associated with those proceedings. **I propose that all comments by community members on any public comment period, public hearings, etc. be applied to all parts of the CON process, including the Environmental Review.** A lot of the information about what the community thinks is already on the public record; please use it.

The Environmental Review associated with the certificate of need must cover the Environmental Justice implications of the Hiawatha Project. This includes considering demographic data on race, age, and income, along with health information including background health issues of the impacted communities. **The ER should also include a thorough review of relevant national scholarship on disproportionate cumulative impacts of environmental toxins in Environmental Justice/ environmentally overburdened communities.** There is a lot of information available from the Office of Environmental Justice at the EPA. **The Environmental Review should include the application of this information to the communities around the proposed routes, including an analysis of the potential health impacts of**

The Phillips neighborhood in particular has borne a disproportionate toxic burden. The neighborhood has one of the highest asthma rates in the city, children who live in Phillips are more likely to have elevated blood lead levels than their counterparts in other neighborhoods, we are located in the middle of the “arsenic triangle” and the neighborhood is designated as a superfund site by the Environmental Protection Agency. It is not a coincidence that the residents of the Phillips neighborhoods are largely low-income people of color. There is a history of locating industry and waste from industry with deleterious health effects in low-income communities and communities of color both in Minneapolis and around the country. Also, Phillips in particular has more

vulnerable populations—children and the elderly—than many other neighborhoods. These individuals are more susceptible to any negative health effects.

My review of the literature shows that the evidence about health impacts associated with EMF from high voltage power lines is inconclusive. However, public health agencies are still not in a position where they are willing to say that is safe to be exposed to EMF. The World Health Organization has recommended a limit for exposure to EMF due to its potential ill health effects. Given the environmental health burden on the neighborhoods along the preferred route, I urge Xcel to use the precautionary principle as their guiding ethos as they move forward with their plans. If there are potential health consequences, the only acceptable ethical approach is to error on the side of protecting people, especially vulnerable populations. I urge the Environmental Review to consider this approach.

The environmental review associated with the CON should include modeling of the actual potential Electro Magnetic Field that could be produced by the 2 115kv lines if they are running at ~75% capacity, in the ‘comfort zone’ cited in the application. Also included should be any proven mitigation options (wrapping the lines), the differences in EMFs emitted by buried vs. above ground transmission lines

The possibility of dislodging soil contaminants if the line is buried along any of the routes should be covered by the ER, including any impacts and cumulative impacts on the health of community residents.

**In order to effectively assess alternatives, each alternative strategy needs to be evaluated as part of a comprehensive package rather than singly.** The way that the CON application compartmentalizes the different strategies covered in the document doesn’t make sense. Look at them in as a package of solutions and evaluate them as if they were applied together—uh, like how they would be in real life. It seems silly that I have to say this.

These alternatives should include the possibility of **upgrading the distribution system.**

I did not find any reference to Permanent Load Shifting in the review. This should be included.

When evaluating alternatives, the long term payback and economic impact should be considered rather than just upfront costs.

Externalized costs of the project should be included rather than only monetary costs, including health and environmental implications of the lines.

When evaluating what’s possible, national best practices, e.g. highly effective case studies, should be used rather than only Xcel’s programs which have relatively low adoption rates.

Thank You,

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