



CITY of ORONO

Municipal Offices

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August 22, 2011

Suzanne Steinhauer
State Permit Manager - Energy Facility Permitting
MN Department of Commerce - Office of Energy Security
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

RE: Proposed Xcel Energy Orono 115kV Transmission Line Project
PUC Docket No. E002/TL-11-223

Dear Ms. Steinhauer:

Xcel Energy is proposing an expansion of the Orono substation and construction of a new 115kV transmission line. The project is within the corporate boundaries of the City of Orono. It is anticipated based on materials presented by Xcel to date that there will be potential impacts to the City and its residents. The Orono City Council desires that all available options and alternatives for reducing or eliminating such impacts be considered and evaluated through the Environmental Assessment (EA) process. We do have a number of critical concerns as well as a variety of general comments about this project. Critical concerns include:

1. The City of Orono is extremely concerned about the new visual impacts likely to be created by the expanded substation and the new transmission lines and poles. The footprint of the substation is increasing approximately ten-fold; the new transmission lines and poles at the proposed heights of 70-90 feet will extend above the local tree canopy and be visible from significant distances from all directions. The Orono Comprehensive Plan includes the goal of preserving natural vistas without man-made intrusions to the greatest extent practicable.
 - Identify and assess the visual impacts of the substation and transmission lines and poles from all off-site locations, and identify and assess all practicable methods to limit the height of new facilities
 - Identify and assess all practicable methods to screen, disguise, camouflage or otherwise remove from general view the substation and transmission lines and poles
2. The City of Orono takes great pride in its dark night skies and the lack of light pollution. Identify and assess any potential lighting or glare impacts resulting from the substation and transmission lines and poles.
 - Will the substation be lit at night? If so, what methods will be used to mitigate the impacts of glare or light reflection? Will all lighting be shielded and downward

facing so that that the sources of said light will not be visible from off-site? Will the structures (substation and poles) be painted or finished in a manner that reduces the impacts of reflected light (i.e. dark colors, flat finishes, etc.?)

- Will the poles have aviation or other warning lights? If so, what color? Will they be blinking or constant?

3. Resources that should be consulted and referenced in the EA include:

- A) City of Orono 2008-2030 Community Management Plan (aka Orono Comprehensive Plan) (September 2010)
- B) City of Orono Surface Water Management Plan (January 2011)
- C) City of Orono - Land Cover Classification and Natural Resources Inventory (March 2006)

We will be pleased to make copies of or access to these documents available to you. Additionally, certain sections of the Orono Zoning Code establish standards that should be applied in assessing the impacts of the proposed project. City staff is available to assist in defining the various pertinent code standards.

The following additional comments are offered as items the City believes should be fully addressed in the EA document:

- a. The purpose of and need for the project should be clearly described. The beneficiaries of the project should be identified.
- b. Identify whether the project is part of a phased long-term plan that will potentially result in future expansions beyond those being proposed at this time.
- c. Identify and list all local, regional, state, and federal approvals and permits required for the project.
- d. The EA should describe the past and current land uses of the proposed site and corridor as well as of the lands surrounding the site, and describe the relationship of the proposed project to surrounding land uses.
- e. Identify the ecological features and natural resources existing at the site and corridor of the proposed project; assess whether and how they will be impacted by the project; analyze alternatives to the project that would eliminate, minimize or mitigate the identified impacts. This analysis should include (but not necessarily be limited to) the following:
 - Define the various cover types before and after the project.
 - Identify wildlife and ecologically sensitive resources and habitats on or near the project site and corridor, and identify how they would be impacted by the project both during the construction process and in the long term.

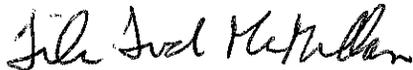
- Identify any state-listed (endangered, threatened or special concern) species, rare plant communities or other sensitive ecological resources on or near the site.
 - Wetlands - Identify local regulatory standards for establishment of wetland buffers and structural setbacks from those buffers that would be applicable if this was being reviewed and permitted locally; describe expected short term impacts from construction process, and proposed restoration methods; define the long term impacts of maintenance needs; assess the stability and construction methods for transmission line poles in wetland or wetland-boundary soils
 - Woodland and upland vegetation; intended cover types and restoration; maintenance of vegetation, limits on vegetation types allowed within easements; long term maintenance of that vegetation
 - Expansion of impervious surfaces;
 - Level of and intent for maintenance of lawns or landscaped areas; brush control
 - Identify any physical impacts on water resources. Identify whether the project will involve the physical or hydrologic alteration of surface waters in the area of the project. Identify any locations where dredging, filling, ditching or other impacts to the wetlands may occur. Describe alternatives considered and proposed mitigation measures to minimize the impacts of these activities.
- f. The site and corridor for this project is not served with municipal sewer or water services. Identify whether the project will involve installation or abandonment of any water wells, appropriation of any ground or surface water (including dewatering), or the need for an individual sewage treatment system. Additionally, address the potential for fire hazards, increased lightning strikes, or other occurrences that may involve the need for local fire department to respond to the site, and address the capability of local services to respond to such issues should they arise
- g. The wetlands west of Hunt Farm Road and within 300 feet of the channel of Painter Creek is within the defined Shoreland Overlay District subject to minimum setbacks and other standards established within City of Orono zoning ordinances. The EA should address whether the proposal is in conformity to those standards.
- h. With regards to stormwater management, the following concerns should be addressed:
- The project area is within or adjacent to Zone A Special Flood Hazard Areas (100-year flood plain) as depicted on FEMA Flood Insurance Rate Map Numbers 27053C0285E and 27053C0301E. The EA should address whether any impacts to flood plains will occur and if so, how such impacts will be mitigated.
 - Identify the locations of all excavation, grading and filling activities proposed. Identify whether excess material will be removed from the site or relocated within the site, and identify the volume of material to be moved from/within the site.

- Identify those areas where soil compaction is likely to occur during construction, and define mitigation measures to be taken. Will any maintenance access roads (paved, gravel or otherwise) be created within the proposed easement areas?
 - Provide calculations describing the quantity and quality of site runoff in the pre- and post-construction conditions. Describe permanent controls to manage or treat runoff. Describe stormwater pollution prevention plans, and define the location of any proposed stormwater management facilities.
- i. Describe all potential and anticipated impacts on groundwater resources in the surrounding area:
- Identify the depth to groundwater in the area
 - Describe the soil types and underlying geological strata at the site, and assess the potential impacts on the local potable groundwater supply serving households in the immediate neighborhood.
 - Describe any wastewaters or potential temporary or permanent solid or hazardous materials that may be generated or released at the site as a result of the expanded substation. Describe how such materials will be treated or contained. Describe types, amounts and compositions of solid or hazardous wastes produced during construction and operation.
- j. Identify any traffic or access impacts associated with expansion of the substation:
- Identify and describe any traffic improvements necessary to serve the expanded substation. Will the existing site access from County Road 6 be improved, relocated or changed in any way?
 - Describe how often and what types of service vehicles will be visiting the site.
 - Identify any potential vehicle-related air emissions that may impact area air quality.
- k. Identify any odors or air emissions that may be generated during construction and when the substation and transmission lines are in operation, and assess their potential impacts on surrounding land uses.
- l. Identify and assess any noise impacts associated with the project during and post-construction. Will the substation and/or transmission lines generate or emit a hum or other constant or temporary sounds that may have an impact on the surrounding neighborhood?
- m. Identify and assess the impacts of dust and debris from construction of the project.
- n. Identify and assess impacts of this project on any of the following resources that may be present within or near the project site and corridor, and describe how those impacts will be mitigated:
- Archaeological, historical or architectural resources
 - Prime or unique farmlands or land within an agricultural preserve

- Parks, recreation areas or trails
 - Scenic views and vistas
 - Other unique resources
- o. Identify alternative corridor routes and substation locations that have been considered, and describe why those alternatives were not proposed in lieu of the current proposal.
- p. Identify and assess the cumulative potential effects of this project and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.

We look forward to your assessment of the environmental impacts of this project, and we stand ready to assist in any way possible. Please feel free to contact Assistant City Administrator Mike Gaffron (phone 952-249-4622; email mgaffron@ci.orono.mn.us) if you have any questions or if we can provide you with further information.

Sincerely,



Lili Tod McMillan
Mayor, City of Orono

cc: City Council
City Administrator Jessica Loftus

Minnesota Department of Natural Resources

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



August 25, 2011

Suzanne Steinhauer
State Permit Manager
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198

Re: Route Permit Application for the Orono Substation Expansion and new 115 kV Transmission Line Project
[PUC Docket Number: E002/TL-11-223]

Dear Ms. Steinhauer:

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit Application for the Orono Substation Expansion and new 115 kV Transmission Line Project and provides the following comments.

Routing Options

Considering information included in the route permit application, the proposed route and alternatives would all result in wetland impacts, tree removal, and may impact state-listed threatened trumpeter swans. Also, three of the alternatives discussed would include additional impacts to the Baker Park Reserve with additional tree clearing adjacent to an existing distribution line.

Based on this review, it appears that the Proposed Route and Alternative Route 1 would result in the fewest environmental impacts. It is notable, however that the Proposed Route crosses Painter Creek and therefore, the DNR would encourage coordination regarding how to best reduce natural resource impacts at this crossing.

Rare Species

A Natural Heritage Information System review was completed by the DNR on March 31, 2011. State-listed threatened trumpeter swans were identified as part of this review. Due to risk of collision for the trumpeter swan, and the concentration of wetland habitat in the project area, the DNR recommends installation of bird diverters for this project along this entire line.

Please note that Sections 6.5.4 and 8.1.6 may be misunderstood. For clarification, the Natural Heritage Information System review did identify a rare plant within the search area, but came to the conclusion that this rare species would likely not be impacted by the project.

Future Coordination

The project proposer has coordinated with the DNR through a Natural Heritage Information System request. The DNR encourages further coordination regarding natural resource impacts expected in the area to discuss minimization of impacts.

Thank you for the opportunity to comment regarding the Orono Substation and Transmission Project. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Jamie Schrenzel".

Jamie Schrenzel
Principal Planner
Environmental Review Unit
(651) 259-5115





414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

August 25, 2011

--Via Electronic Filing--

Suzanne Steinhauer
State Permit Manager
Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198

RE: NORTHERN STATES POWER COMPANY APPLICATION TO THE MINNESOTA
PUBLIC UTILITIES COMMISSION FOR A ROUTE PERMIT
ORONO SUBSTATION REPLACEMENT AND NEW 115 kV TRANSMISSION LINE
PROJECT
ALTERNATIVE PERMITTING PROCESS
DOCKET NO. E002/TL-11-223

Dear Ms. Steinhauer:

Northern States Power Company, a Minnesota corporation (“Xcel Energy”) submits the following comments regarding the scope of the Environmental Assessment (“EA”) for the proposed 115 kV Orono Substation Replacement and New 115 kV Transmission Line Project (“Project”). In the route permit application, Xcel Energy proposed using single-pole, galvanized or weathering steel davit arms or braced post structures for the Project. Xcel Energy is now proposing to use two Y-frame structures for the Project and respectfully requests that this new structure type be evaluated in the EA. These proposed Y-frame structures will be used for Structure Nos. 076 and 078 as shown on Figure 2 of the Application. Below is an updated structure design summary for the Project, Table 5 of the Route Permit Application, that includes the Y-frame structures.

| Structure Type | Line Type | Structure material | Typical Right-of-Way Width | Structure Height (feet) | Structure Base Diameter (inches) | Foundation Diameter (feet) | Span between Structures (feet) | Structure Nos. |
|---------------------------------|-----------------------|--------------------------------|----------------------------|-------------------------|----------------------------------|----------------------------|--------------------------------|----------------|
| Single Pole, Cross Arm, Y-Frame | Single Circuit 115 kV | Galvanized or Weathering Steel | 75 | 70 to 90 | 36 to 48 | 6 to 8 | 300 to 500 | 078, 076 |

August 25, 2011

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|--|------------------------------------|---|----|-----------|----------|--------|------------|--|
| Single Pole, Vertical Configuration with Post Insulators | Single Circuit 115 kV | Galvanized or Weathering Steel | 75 | 70 to 90 | 36 to 42 | 5 to 7 | 300 to 500 | 077 |
| Single Pole, Davit Arm | Double Circuit 115/115 kV | Galvanized or Weathering Steel | 75 | 75 to 115 | 36 to 48 | 6 to 8 | 500 to 650 | 076-1 076-2, 076- 3, 076-4, 076-5 |

Please call me at (612) 330-6435 if you have any questions.

Sincerely,

s/ Joseph G. Sedarski

Joseph G. Sedarski
Senior Permitting Analyst

cc: Project Service List

**NORTHERN STATES POWER COMPANY
APPLICATION TO THE MINNESOTA PUBLIC
UTILITIES COMMISSION FOR A ROUTE PERMIT
ORONO SUBSTATION REPLACEMENT AND NEW
115 kV TRANSMISSION LINE PROJECT**

**CERTIFICATE OF SERVICE
ALTERNATIVE PERMITTING PROCESS
MPUC DOCKET NO. E002/TL-11-223**

Theresa Senart certifies that on the 25th day of August, 2011, she filed a true and correct copy of **Northern States Power's EA Scoping Comments Letter** by posting the same on www.edockets.state.mn.us. Said Scoping Comments have also been served via U.S. Mail or e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

/s/ Theresa Senart

Theresa Senart

Service List Member Information

Electronic Service Member(s)

| Last Name | First Name | Email | Company Name | Delivery Method | View Trade Secret |
|-----------|------------|----------------------------------|------------------------------------|--------------------|-------------------|
| Anderson | Julia | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | Electronic Service | Yes |
| Ferguson | Sharon | sharon.ferguson@state.mn.us | Department of Commerce | Electronic Service | No |
| Haar | Burl W. | burl.haar@state.mn.us | Public Utilities Commission | Electronic Service | Yes |
| Lindell | John | agorud.ecf@state.mn.us | Office of the Attorney General-RUD | Electronic Service | Yes |
| Sedarski | Joseph G. | joseph.g.sedarski@xcelenergy.com | Xcel Energy | Electronic Service | No |

From: [Michael Kuruville](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Cc: [Kirsch, Raymond \(COMM\)](#); [Kaluzniak, Mike \(PUC\)](#)
Subject: Xcel's Orono Substation proposal- Ref: PUC Docket Number: E002/TL-11-223
Date: Friday, August 26, 2011 3:31:04 PM

Dear Ms. Steinhauer,

I am a resident of Huntington Farm neighborhood in Orono and the president of Hunt Farm Home Owners Association. I am writing this letter as a representative of my neighborhood.

Xcel Energy's proposed Orono Substation is right behind my house and very close to the entrance to the Huntington Farm neighborhood houses (Hunt Farm Road). **Not only that this proposed substation will be next to my backyard, the proposed route is next to several of our association members houses with one of the big power poles next to the house of another home owner.**

We, myself as well as the other home owners, have some major concerns on where Xcel is proposing their expanded substation and how they are going about trying to do it. When Xcel found out that they have opposition from the home owners, they pulled their application from the City of Orono and went to the PUC. We feel that these actions show that Xcel is trying to ram this project down our throat because they are a big company and they can easily ignore the people. We hope and expect Xcel will take into account our issues and concerns and move their expanded substation to another location.

Here are some of our concerns:

1. How can Xcel easily go through the wetlands within and next to our association property? What kind of environmental impact does this have on the wetlands if this go through the currently proposed plan?
2. What are the health issues that we would face who will be living next to this big power grid?
3. What kind of potential accidents would we be exposed to from an expanded substation from lightening, storms, tornados, etc. (I have seen occasional lightening fires at the current Xcel station- which is considerably smaller than the one they are proposing now)?
4. What would the economic impact that we would suffer from the loss of our property values if this humongous substation is built next to our neighborhood entrance? I know my home value will be substantially reduced (since it is right next to my house) and I could have a very difficult time selling my house.

We want to start out by stating that we are not against Xcel's substation expansion. What we are hoping is that Xcel will find another site for their expanded substation that will have the least effect on the homeowners and the surrounding environment.

Though it may seem to be the easiest and cheapest route for Xcel to expand their substation at the current site since they already own the property at this location, there are other plausible solutions available. Again, since Xcel is a big company they may have the power to do whatever they want for their convenience. **However, in my opinion, for the good of the people, Xcel should do the right thing- not easiest or the cheapest.**

I believe Xcel could sell or swap their current property and acquire a similar property to build the substation without losing money. Xcel could make their current property into a small neighborhood park or leave to the wild life .

There are properties near the current Xcel facility that I believe are away from homes that Xcel could potentially acquire to build an expanded substation.

I am attaching a yahoo map of the surrounding area where I marked 4 potential properties. (1) a property just north of the current Xcel property; (2) a property next to the Gun Club on County Road 6; (3) a property north of Wayzata Blvd; and (4) a property on the south side of Wayzata Blvd (and this property is for sale).

These are my initial thoughts on this subject. Please let me know if I can provide more information and/or comments on this. I appreciate any help you can provide in persuading Xcel to move their substation to a location that would have lesser impact on the environment and the people. Thank you so much for your time.

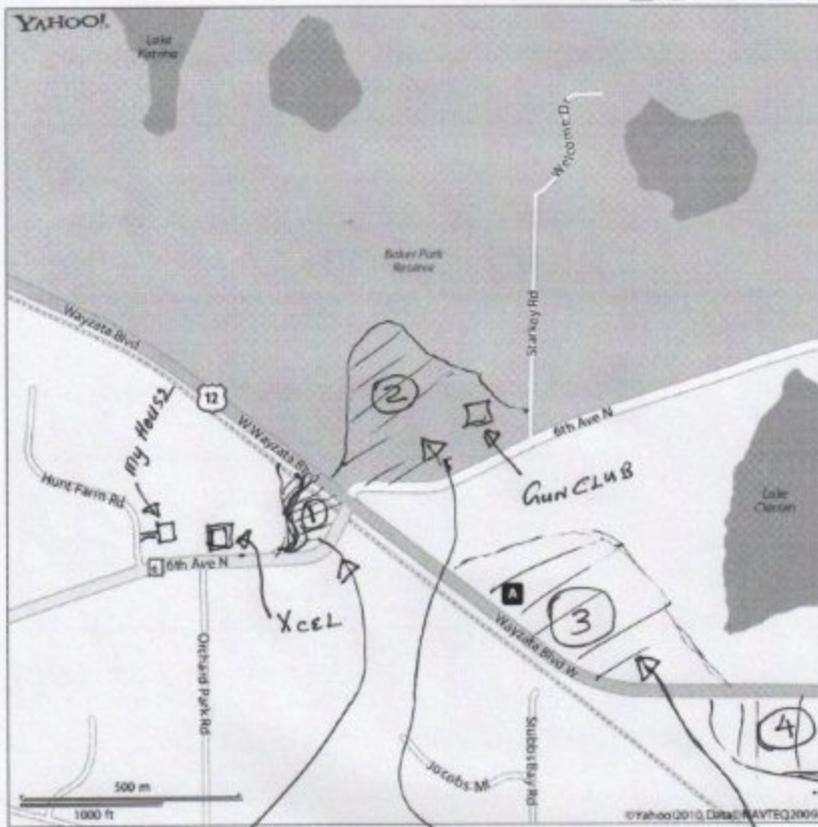
Sincerely,

Michael Kuruvilla (Kallivayalil)
760 Hunt Farm Road
Orono, MN. 55356

August 26, 2011

Map of 44.991684,-93.615509

YAHOO!



When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

- ① LAND CLOSE TO CURRENT XCEL
- ② LAND NEXT TO GUN CLUB
- ③ LAND ON THE NORTH SIDE OF WAYZATA BLVD
- ④ LAND ON THE SOUTH SIDE OF WAYZATA BLVD