

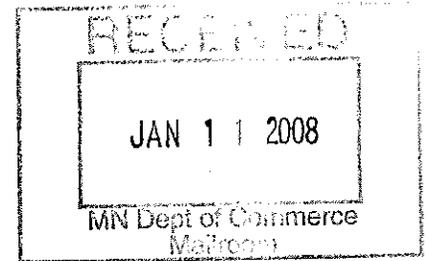
SAINT JOHN'S
ABBEY



Saint John's
UNIVERSITY

January 10, 2008

Mr. David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198



Subject: CapX2020 - St. Cloud to Fargo Line - 06-1115

Dear Mr. Birkholz,

Saint John's Abbey and University just completed their 150th anniversary. With such a long history on nearly 3,000 acres of land in central Minnesota, we have a strong "sense of this place", where over 150 monks live and work. Saint John's University has nearly 2,000 students and hundreds of employees. Saint John's and the surrounding Avon Hills serve as an "oasis of green" for this whole area.

We are concerned about the effect that a 345 kV transmission line with its 175 foot towers would have on the natural and cultural resources of our area. Frankly, we are also concerned with how it would affect our business of educating students. One of the reasons commonly given by students for choosing this University is the unspoiled rural setting.

We are also well aware that all of us here contribute to the need for power transmission. As such, we also understand that we cannot trivialize or negate the need for transmission simply because we do not like the idea of tall towers in a natural landscape.

One problem we face is our lack of knowledge in evaluating the actual need for this 345 kV line. As such, we cannot offer you any concrete evidence for or against the need stated by the utilities. We trust that the Public Utilities Commission and the Department of Commerce will use their knowledge to act in the public's best interest. We have done some research, including holding an ad hoc public meeting on this topic this month at our institution. Our speakers included Darrin Lahr and his staff from CapX2020; Beth Soholt from Wind-on-the-Wires; and George Crocker of NAWO.

The following are technical and policy issues we feel must be examined prior to any decision on this St. Cloud-Fargo section of the line. (We do not have a comment on the Monticello-St. Cloud section.)

How has the 2007 legislative requirement for 25% renewable energy changed the need?

- Has the analysis been done to see if CapX2020 would be different if it had started after this 2007 mandate?

- The CapX2020 proposal was designed to meet a projected need for about 6,000 MW of additional electrical generation capacity during the forecast period. Those forecasts have since been abandoned due to changed circumstances. Considering that revised forecasts project a need for about half as much new generation capacity as the abandoned forecasts, why hasn't the CapX2020 proposal been revised to reflect the new projections?

Is CapX2020 a continuation of an old-paradigm, in which relatively few old-fashion central-station generators will get hooked up to remote loads (cities) with relatively few extra-high voltage power lines?

- We think that the PUC should at least look at a policy change that could guide our society towards a cheaper, quicker, less disruptive, and newer paradigm infrastructure to optimize distributed and dispersed community-based energy development.
- If true that thousands of megawatts of new coal-fired capacity west of Minnesota are already in the Midwest Independent System Operator (MISO) Queue, considering that existing Dakota coal capacity is already transmission-constrained, and considering the limited number of substations (which serve as "on-ramps" for energy from Minnesota-based generation capacity) along the line routes in Minnesota, what will prevent these power lines from being used to transmit larger amounts of coal-fired electricity, and diminished amounts of C-BED electricity generated in Minnesota?
- What is the transmission infrastructure cost on a per megawatt basis for each new megawatt of electrical generating capacity made possible by the CapX2020 proposal?

What are the alternatives to building this line?

- Considering the complexity and scale of the interconnected electrical utility system, it appears in some ways that the applicant and the regulators are interested in considering only one scenario for addressing multiple perceived inadequacies of the system. Why do no alternatives appear to be included in the CapX2020 application?
- Can dispersed generation using existing transformers at multiple locations solve the problem at a much lower cost?
- What are the system alternatives (supply-side and demand-side) to the CapX2020 proposal?
- Will each proposed CapX2020 power line be justified on its own merit, and not lumped together as a single package?

We also have the following environmental issues that should be included in the review process:

Saint John's owns 2,740 acres and encompasses several hundred acres of public water. The campus uses only 100 acres and the rest is forest, wetlands, prairies, and lakes.

- Saint John's is a State Game Refuge and has been for 70 years.
- Saint John's property is listed on the MN DNR County Biological Survey as high quality intact ecosystems of mesic oak and maple-basswood. A map of the property with rare species locations is attached. These include cerulean warbler nesting sites and red-shouldered hawks, among others.
- Our lands and forests are inspected annually by the Forest Stewardship Council and we have been certified since 2002 in the highest category of "well-managed" forests.
- The campus is the home of a collection of historic buildings which are listed on the National Register of Historic Places.

- The campus is also home to numerous buildings designed by world famous architect, Marcel Breuer, including the famous Abbey Church and Bell Banner which was again noted in a New York Times article just this month.
- The miles of hiking and ski trails at Saint John's are heavily used and are open to the public as well as students and staff.

Saint John's land lies within the boundaries of the Avon Hills Initiative and supports their mission of maintaining open space and habitat in the nearly 50,000 acres of unique rolling, wooded landscape that surrounds Saint John's.

- The Avon Hills Initiative has mapped the diverse natural resources of the area. (See attached.) This relatively small area located in four townships (Avon, Collegeville, Saint Wendell, and Saint Joseph) encompasses the largest collection of native plant communities and rare species in Stearns County.
- The Stearns County Planning Commission has recommended that the County adopt a special Conservation Overlay District for the Avon Hills area as part of the new Stearns County comprehensive plan.
- The Legislative Citizen Commission on MN Resources (LCCMR) just awarded \$337,000 to protect the landscape of the Avon Hills.

Last year, the Audubon Society named the Avon Hills area as its latest "Important Bird Area" in Minnesota. The remaining natural habitats are very important in what is otherwise a largely human-dominated and disturbed landscape.

In closing, we hope you will give careful analysis to the natural features of our landscape. We also hope you will give careful thought to the underlying policy issues that are driving the CapX2020 issues. We want to be part of a solution that is forward-thinking and balances all the issues as much as possible. Please advise us if we can be of further assistance.

Respectfully,

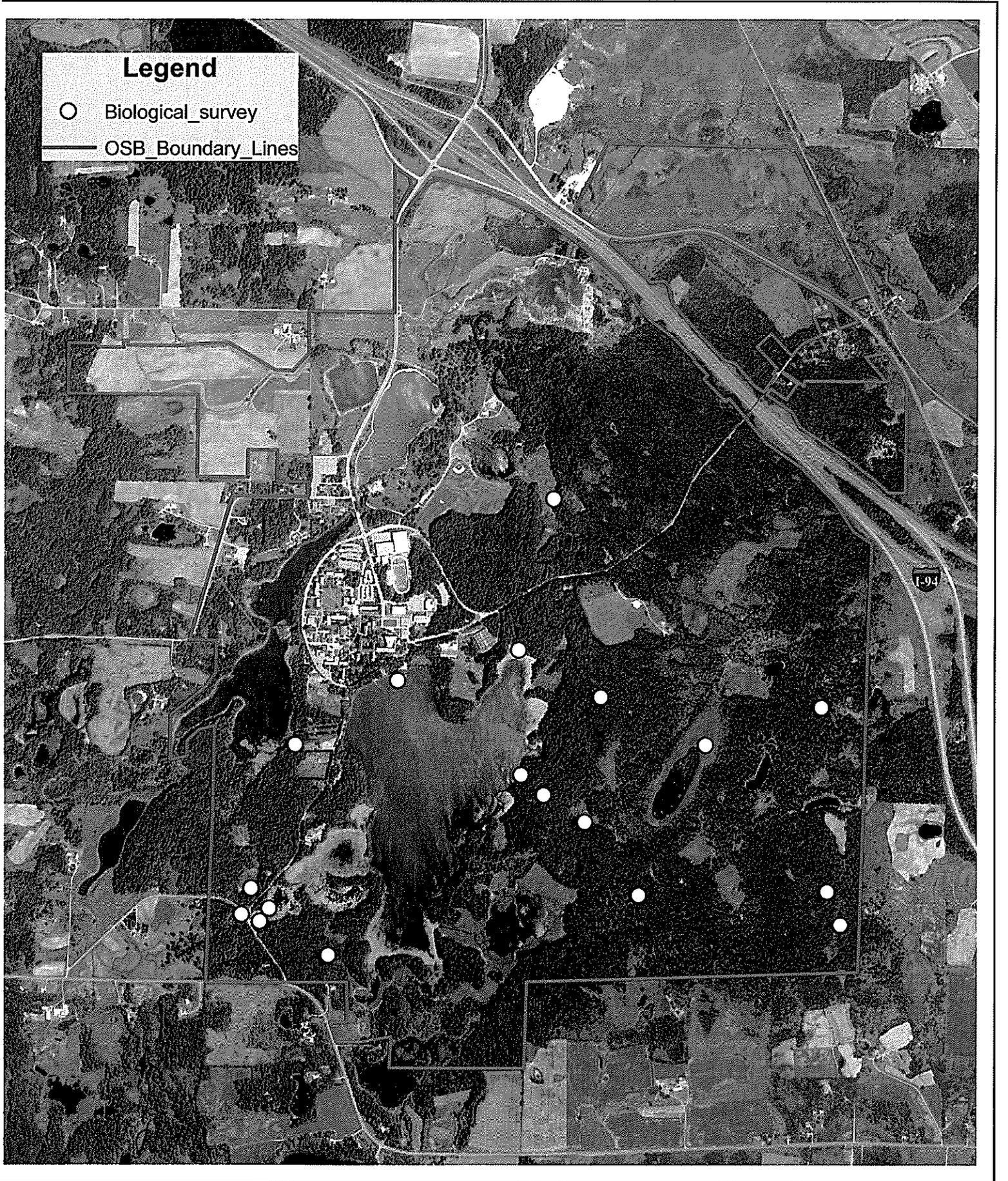


Benedict Leuthner, OSB
 Treasurer
 St. John's Abbey/University
 P. O. Box 2222
 Collegeville, MN 56321-2222

Enclosures

Cc: Abbot John Klassen, OSB
 President Diedrich Reinhart, OSB
 Thomas Kroll - Land Manager

Saint John's Arboretum Boundary Lines and Trails



Legend

- Biological_survey
- OSB_Boundary_Lines

2003 Photo

0 950 1,900 3,800 5,700 7,600 Feet

4 inch equals 1,007 feet

CREATION OF THIS MAP

This map was created in three steps. First, existing biological and other information was mapped for the four-township area. Second, residents of the Avon Hills met to map areas that they believed were important for a variety of reasons, including aesthetic and cultural. Lastly, the map printed on the reverse side was created by combining all these considerations. To create the initial four-township map, information was assembled for:

- Sensitive species;
- High quality habitats;
- Natural vegetation;
- Steep slopes and coarse-textured soils.

Sensitive species data came from the DNR Natural Heritage and Nongame Research Program, high quality habitats from the DNR County Biological Survey, and natural vegetation from the DNR Land Cover data project. Natural vegetation included forest, savanna, grassland, forested wetland, shrub wetland, and herbaceous wetland. Wetland data were developed by combining the National Wetlands Inventory data and the DNR Land Cover data. Buffers were drawn around some of the features in the landscape:

- 30 meters around lakes and streams
- 200 meters around high quality wetlands
- 650 meters around rare forest bird nesting sites

In February, 2004, using the above maps as a guide, residents of the Avon Hills met in township groups and combined the above data with their own experience and knowledge to create a map that defined the important areas of their township. The individual township maps were combined and an overlay of three special area types was created:

Upland Conservation Areas (Green) contain continuous forest that provides wildlife habitat and supports sensitive species of animals and plants. They also provide clean water into the aquatic system. The fairly large tracts of intact forest are unique in this area of themselves.

Lowland Conservation Areas (Blue) contain areas that are important to maintain water quality and natural water flows to lakes and streams, and in addition contain wetlands that provide wildlife habitat and support sensitive species. Some locations are areas where storm water management is an issue, such as along the I-94 interstate corridor.

Recreational and Rural Beauty Areas (Red) preserve rural beauty and the opportunity for residents and others to continue to pursue recreation in nature. Those travel corridors which are seen as especially scenic and well traveled were targeted.

USE OF THIS MAP

This complex map is useful to Avon Hills residents but requires some practice to use. There are three important types of areas shown as shading on top of more detailed areas. These areas—Upland Conservation Areas, Lowland Conservation Areas, and Recreational and Rural Beauty areas—are identified by their broad and extensive shapes in pale green, blue, and red.

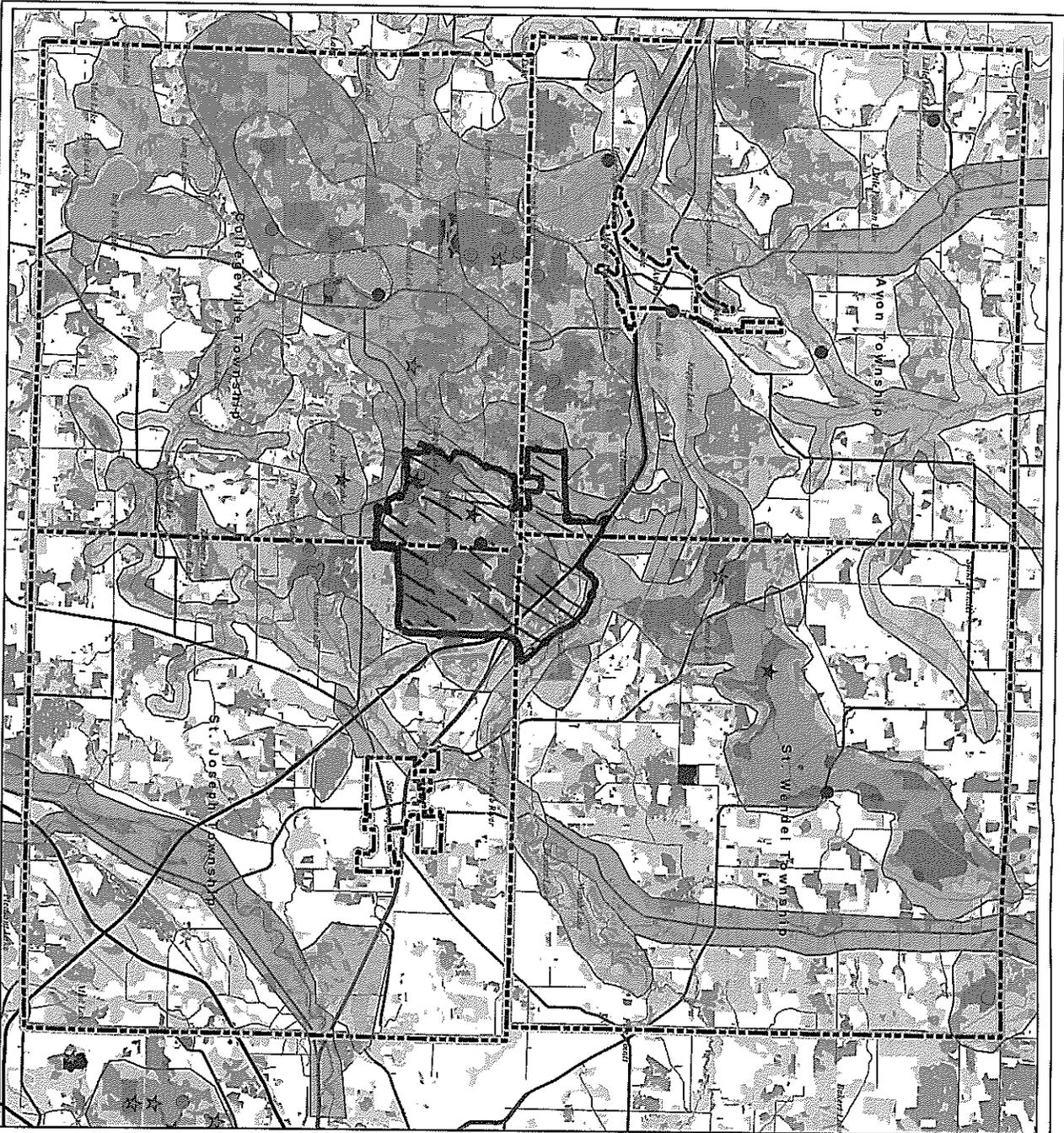
Underneath the shaded the areas are additional details that explain why these areas are important. Beneath the pale green Upland Conservation Areas can be seen dark green forests that provide high quality habitat (Higher Quality Upland Plant Community). The light green forests also provide habitat, but of a lower quality (Upland Land Cover 1991). Inside the forests are found red dots representing sensitive forest bird species. Also in the Upland Conservation Areas can be found savanna and grassland habitats of higher and lesser quality.

A similar system is used for the pale blue Lowland Conservation Areas. Higher quality habitat, lesser quality habitat, and sensitive species all appear beneath the pale blue shading. The Recreational and Rural Beauty areas also contain some of these natural features, but in lesser amounts.

Note that higher quality habitat, sensitive species, and lesser quality habitat (that is, Land Cover) exists outside the pale green, pale blue, and pale red shaded areas. This is due to Avon Hills residents choosing to focus attention on the concentrations of the important natural and cultural features of the Avon Hills. This is not to say that a high quality forest outside a pale green Upland Conservation Area is not important. The map only suggests that, to make the greatest progress with the resources available, attention should be focused inside the shaded areas.

LIMITATIONS OF THIS MAP

The sensitive species and high quality habitat information was provided for this project by the Minnesota County Biological Survey and Minnesota Natural Heritage and Nongame Research Program. The County Biological Survey surveyed and mapped the high quality habitat in the Avon Hills and makes the information widely available in printed and digital form. The information is not based on a comprehensive inventory, however, so that some rare or otherwise significant natural features in the Avon Hills are not represented. Survey work for sensitive species (rare plants and animals) is less exhaustive than for high quality habitat; therefore ecologically significant features may exist for which there are no records.



Legend

- ★ Rare Upland Plant
- ★ Rare Lowland Plant
- Rare Forest Bird
- Rare Lowland/Aquatic Animal

Higher Quality Upland Plant Community

- Deciduous Forest
- Savanna and Grassland

Higher Quality Lowland Plant Community

- Deciduous Forest
- Helobaceous and Shrub Wetland

Lowland/Aquatic Land Cover (1991)

- Forested Wetland
- Herbaceous and Shrub Wetland
- Open Water
- Stream

Upland Land Cover (1991)

- Deciduous Forest
- Savanna and Grassland

Other Land Cover

- Cropland or Developed Land
- Major Roadway
- County Road
- Township & Municipal Road
- Town Road

Resource Area (See Description Below)

- Recreation and Rural Beauty Area
- Lowland Conservation Area
- Upland Conservation Area

Resource Area Description

Recreation and Rural Beauty Area
 The major focus in this area is to preserve the rural beauty of the region, support agriculture and provide recreational opportunities. This area includes scenic views, wetlands, and other recreational opportunities.

Lowland Conservation Area
 The major focus in this area is to protect water quality, maintain riparian habitat, improve wildlife habitat through riparian corridor management, and maintain populations of sensitive species.

Upland Conservation Area
 The major focus in this area is to preserve the continuous forest habitat, maintain populations of sensitive species, and maintain populations of sensitive species.



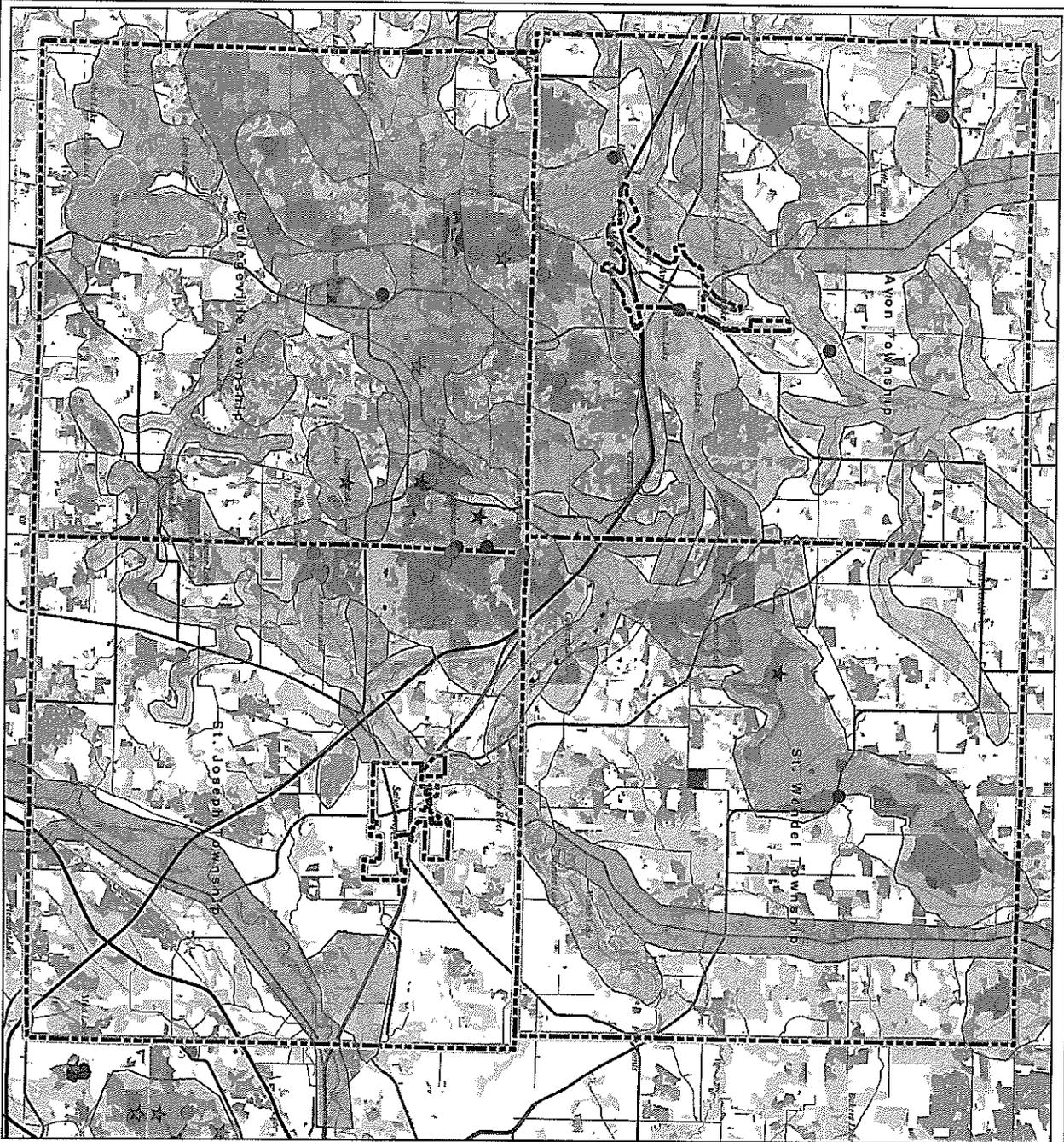
Avon Hills Initiative Conservation Vision

Date: April 22, 2004
 AES: 03-294, base_naturalareamap.mxd



Applied Ecological Services, Inc.
 21928 Mauthorn Road
 Prior Lake, Minnesota 55372
 Phone: 952-447-1919
 Fax: 952-447-1920
 E-mail: info@eppldeco.com

Avon Hills
 Stearns County, Minnesota
 College of St. Benedict's/St. John's University
 The Nature Conservancy



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Lowland Conservation Area
The major focus in this area is to protect water quality, maintain riparian habitat, and provide for wildlife using ecological and natural populations of sensitive species.

Upland Conservation Area
The major focus in this area is to preserve the continuous forest the land, and maintain populations of sensitive species.



Avon Hills Initiative Conservation Vision

Date: April 22, 2004
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Avon Hills
Stearns County, Minnesota

College of St. Benedict's/St. John's University
The Nature Conservancy



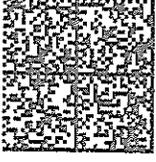
Applied Ecological Services, Inc.
21999 Mounthorn Road
Prior Lake, Minnesota 55372
Phone: 952-447-1919
Fax: 952-447-1920
E-mail: info@appliedeco.com

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Benedict Leuthner, OSB
Treasurer
St. John's Abbey/University
P. O. Box 2222
Collegeville, MN 56321-2222

Mr. David Birkholz
Energy Planning Permitting
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

First Class



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