Fargo to St. Cloud 345kV Transmission Line Project
PUC Docket No. E002, ET2/TL-09-1056

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Energy Facility Permitting
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The Purpose of my comments is to identify potential alternatives to and impacts of the proposed project that should be fully addressed in the Environmental Report being prepared by the Department of Commerce. So please consider all that is mentioned below.

It makes no sense that the CapX2020 utilities didn't consider an I-94 route from Freeport to St. Cloud. The DEIS has to include this as an alternative and provide detailed information on this potential route. In order not to create a straw man out of the I-94 route, the DEIS should consider slight deviations from the I-94 corridor and short stretches of underground power line in order to address particularly sensitive areas while keeping on the Interstate corridor as much as possible.

It is my understanding that Minnesota statute requires new utilities to follow existing rights of way when ever possible. Failure to consider an I-94 route appears to be a direct violation of such statute, and reflects a lack of good faith effort on the part of CapX2020 to plan this route in an appropriate manner. It also appears lack of consideration of an I-94 route is subject to legal challenge.

Using construction techniques listed above, I believe the cost of an I-94 route will be substantially equal, or less than, the cost of the Northern routes. The Northern routes are substantially longer and require a great many corner towers which carry enormous cost relative to "in-line" towers. Obviously, cost must include the hard dollar costs of the infrastructure (extra miles of line and significant corner and "in-line" towers) and related ongoing maintenance. Additionally, soft costs must also be included in this process. Soft costs must include the disruption of vulnerable environmental ecosystems, loss of woodlands, rights of way in productive farmland, violation of historic properties and visual pollution created by said infrastructure. All costs must be considered and quantified. Again, an I-94 route must be considered, this time based on cost issues.

Specifically, The Northern routes violate a minimum of two sensitive environmental areas; the Shepard Lake wetland immediately north of St. Wendel and the tamarack bog east of St. Wendel. It is widely known this tamarack bog is one of only a handful of such ecosystems in the entire United States. In addition, I believe efforts are underway with the Minnesota Department of Natural Resources (DNR) to preserve and protect the environmental value of the Shepard Lake wetland. Have detailed environmental impact studies of both areas been conducted? In addition, how has the DNR been brought into the process of route evaluation?

I support the recommendation of Stearns County in their letter of November 4, 2009 that the preferred route be located as close to the current I-94 freeway corridor as possible in order to affect as few homes and businesses as possible. The DEIS must consider this alternative in the area from Freeport to St. Cloud. As noted in detail above, the utility's proposal is incomplete and doesn't fit state law.

As I have noted earlier, potential environmental impacts must be carefully analyzed in the Environmental Report. In order to reach a reasoned decision on weather to allow large industrial energy faculties to dominate the landscape across our land, we must first analyze what the environmental consequences might be and weather the trade off is justified. Considerations must include:

- Aesthetic impacts
- Destruction of large blocks of forested areas
- Threats to endangered species, flora, fauna
- Impacts on cultural, historic and archeological resources
- Wildlife refuges and production areas
- Recreation areas
- Electromagnetic fields
- Farming interruptions
- Industrialization of rural landscapes
- Interference with radio, GPS, cell phone and TV signals
- Forest fragmentation
- Habitat protection areas
- Migratory bird flyways and food resources
- Large wet land complexes, fens
- Challenge to get heavy equipment into vast wetland complexes
- Access roads are inadequate to support major equipment without significant upgrades
- Spontaneous abortion
- Children and the health effects of electromagnetic fields

Thank you for your consideration of my comments.

Sincerely,

Stephen and Judy Huls

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