February 11, 2010

Mr David Birkholz
Minnesota Department of Commerce
Office of Energy Security/ Energy Facility Permitting
85 7th Place East, Suite 500
Saint Paul, MN 55101

Sent by email to
david.birkholz@state.mn.us

RE: TL-09-1056
CAPX2020 Fargo to St Cloud 345 kV Transmission Line Project
Comment –Pre- EIS Scoping Decision

Dear Mr. Birkholz:

I own and live on 80 acres in Farming Township, Stearns County. This property, on one of the highest points in the County, is situated on a north-south ridge. Parallel to it, around a quarter mile to the east, is a gravel road ("Mapleview Road") that runs south one mile from County Road 40, turns west one-fourth mile (as "300th Street") and then dead-ends at my driveway. It is a narrow road, with marshes, brush and Jopp Lake right up to its edges. To my knowledge, this is one of only two public roads in a block of land that is 3 miles by 1.5 miles. Much of that block of land is woods, marsh, spring-fed ponds[1] and pasture. Our property contains nearly 50 acres of "big woods" remnant, adjacent to other woodlots on neighboring properties. On the northerly 40 acres, we have restored wetlands with the help of the Fish and Wildlife Service and planted prairie.

I do not know a lot of environmental science, but this seems to be a transitional area. When I attended a conference for small woodlot owners in Duluth years ago, a representative from the Minnesota DNR who was helping me pinpoint my property on a digital version of the "Field Guide to the Native Plant Communities of Minnesota" laughed and said "You really ARE on the edge of the prairie". To the east of my ridge are marshes, springs and potholes. To the west, it rolls into prairie.

While we seem to have lots of wildlife in this area, what I note are the birds. In this little segment just north and south of County Road 40 and between my ridge and Mapleview, white pelicans*, loons*, bald eagles, blue herons, green herons, trumpeter swans, mourning doves, bobolinks, red-headed woodpeckers, indigo buntings, sandhill cranes,* turkeys, pheasants, barred owls and northern harriers* are all common or relatively common sights[2]. Last week we saw a very small owl, perhaps a screech owl. What we believe are white-throated sparrows have passed through. This past summer, the bald eagle was often floating in the air over this ridge. The herons spend their days in Jopp Lake or just across Mapleview in the stream that flows from it. The pelicans center on Henry Lake (northwest side of the Cty Rd 40/ Mapleview intersection) with overflow onto Jopp and Sand Lakes. Some pelicans appear to nest there and larger populations congregate in spring and fall. I have watched them fly in a floating, downward funnel, holding up and down in the air, both above my ridge and at the Cty Rd 40/Mapleview intersection. The herons, pelicans, cranes, hawks and other birds cross my ridge at low altitude,

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[1] The east side of the ridge is full of springs or water seeps. Many of the ponds are shallow, but wet all year. In the southwest corner of my acreage is a spring reputed to be the site of a prohibition-era still.
[2] An asterisk indicates nesting birds we know of.

apparently in an effort to minimize the work required to reach their nesting sites on Big Rice Lake and the ponds to the south and southeast.

Preferred Route Segment Alternative 1 of the Fargo to St Cloud Transmission Line Project ("PRSA 1") runs along this section of Mapleview Road. The construction of a transmission line along PRSA 1 would require clearance of the vegetative cover that runs right up to the narrow road; would disturb the wetlands that hold so much wildlife; would impede or harm[3] the pelicans, trumpeter swans, herons, and other birds that frequent the environs of Jopp Lake, the nesting sandhill cranes, bobolinks, northern harrier hawks along the ridge, the bald eagle that frequently perches by Henry Lake, and all manner of other migratory waterfowl that regularly travel between the lakes. The tops of the transmission lines, only slightly higher than the ridge, may be problematic. It will proliferate man-made structures through a large, significantly undisturbed area, both along a dead-end dirt road, then cross country where no roads or even driveways exist.

With these concerns in mind, I request that the Environmental Impact Study include the following four additional alternative proposed routes, and further that for each alternative, both above ground and buried lines installations be considered:

1. A 1,000 foot wide strip outward from the northerly and southerly I-94 right of way boundaries in those areas of Stearns County where the proposed Preferred and Alternative routes currently divert from the I-94 Corridor.

2. A 1,000 foot wide strip along County Road 157/54 in those areas in and around the cities of Albany and Avon where the proposed routes currently divert from the I-94 Corridor.

3. A 1,000 foot wide strip along the Wobegon Trail in those areas in and around Albany, Avon and Collegeville where the proposed routes currently divert from the I-94 Corridor.

4. A new segment of PRSA 1 as follows: From the north line of Farming Township, south along Mapleview Road to County Road 40, thence easterly along County Road 40 to Clear Lake Road, thence southerly along Clear Lake Road. (Thereby redacting from PRSA 1 that segment of Mapleview Road south of County Road 40 and the overland route south and east to Clear Lake Road.) This is not intended to advocate for PRSA 1 at all.

In addition, I would request that the Environmental Impact Study ("EIS") be tasked to include inquiries into the following content areas:

The lands and waters proximate to Mapleview Road provide a diverse and transitional ecosystem, somewhat unusual to the area, which offers significant opportunities for native flora and fauna. PRSA 1 traverses nearly 5 miles of continuous lakes and wetlands, from southern Albany Township through the center of Farming Township. Accordingly, the EIS should carefully

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[3] "The common types of birds that are typically involved in collisions are the large waterfowl, which include trumpeter swans, Canada geese, pelicans, cranes and mallards. In general, it is most effective to avoid placing lines near major flyways, especially those where birds roost and feed." Letter of Pamela Jo Rasmussen, Xcel Energy Permitting Analyst, to John N. Wachtler, Minnesota Environmental Quality Board, Re Docket MEQB No. 03-73-TR-Xcel, September 15, 2004.

consider the environmental effects of transmission lines on the birds and waterfowl that inhabit this area, as well as the many springs and wetlands.

Conversational voices travel considerable distances along this ridge, much as across a lake. The background noises in this area are those of birds and breezes. It is peaceful for wildlife and humans alike. The EIS should consider the noise of the porposed lines in relation to the acoustics of the terrain, the strong winds off the ridge and the elevation of the land. The increased noise and other effects of any mitigative bird deflectors should also be examined.

Finally, in light of the reality that once a utility route is established, the policy of nonproliferation encourages further development along the same corridor, the EIS should consider the cumulative effect of a proliferation of utility infrastructure on this fragile and important ecosystem.

Thank you for your consideration of this input.

Sincerely,

Jean M. Didier
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