The Nature Conservancy
Protecting nature. Preserving life.™

The Nature Conservancy in Minnesota
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FAX

To: David Birkholz
Project Manager

From: Peggy Ladner

Pages including cover sheet: 7

Re: Fargo – St Cloud 345 kV line

Date: February 11, 2010

Fax: 651-297-7891

CC:

Phone: 651-296-2878

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☐Urgent ☐For Review ☐Please Comment ☐Please Reply ☐Please Recycle

Comments:

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February 11, 2010

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

Re: Docket Number TL-09-1056

Dear Mr. Birkholz:

Thank you for the opportunity to provide comments on what areas of research should be included in the scope of the Environmental Impact Statement for the proposed Fargo to St. Cloud 345 kV transmission line project. The Nature Conservancy appreciates the sizeable quantity and high quality nature of the information prepared by Xcel Energy and Great River Energy as part of the CAPX2020 Route Permit Application made available to the public on-line for review. The detailed maps and data were helpful to us in our review of the proposed Preferred Route, Preferred Route Segment Alternative and the Alternate Route.

Please see the attached letter dated November 16, 2007 from me to Craig Poorker of Great River Energy and the letter dated November 23, 2009 to Scott Elk of the Minnesota Office of Energy Security for additional background on the Conservancy's position on the planning, permitting and siting of the three proposed high voltage transmission line projects.

The Conservancy recommends that the EIS include an analysis and discussion of the feasibility of aligning the entire 345 kV transmission line within and containing it to the rights of way of existing highways, roadways and/or existing utility easements, other than where resources of statewide significance fall within those rights of way. This should do the most to reduce the impact on natural resources as well as being the most cost effective.

Along the Preferred Route, Preferred Route Segment Alternative and Alternate Route for the Fargo to St. Cloud line there are several areas of great importance to The Nature Conservancy. Please see attached chart for a summary of these locales. These areas contain significant public and private conservation lands, lands or aquatic resources of high biodiversity significance, and/or are the focus of coordinated conservation planning and merit closer examination.

In these areas in particular, the Conservancy recommends that the EIS include a consult of the MN DNR's Natural Heritage Database, Minnesota County Biological Survey data, the "Comprehensive Wildlife Conservation Strategy" and "Minnesota's Aquatic Management Area Acquisition Plan, 2008-2033" for an accurate assessment of the element occurrences, biodiversity significance of natural communities and aquatic resources, and/or Species of Greatest Conservation Need within and adjacent to the proposed 1,000-foot route areas. This

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information should be used to further refine the siting of the 150-foot wide transmission line right of way and placement of the single-pole structures at a fine scale to avoid impacting these resources of statewide significance.

As I mentioned in my November 16, 2007 letter to Mr. Poorker, the spatial impact of poles and transmission lines on species and natural communities of concern often extend far beyond the actual facilities. For instance, one of the threats to the greater prairie-chicken (*Tympanuchus cupido)*, a Minnesota Special Concern species, is predation from raptors. Electrical power poles providing perching sites from which raptors can hunt. Because of this, it is recommended that transmission lines and power lines be located up to three miles away from native prairie identified by the Minnesota County Biological Survey.

The above recommendations are in addition to the usual scope of study for a major EIS of this nature, such as an examination of potential impacts to cultural, historic and public lands, acres of wetland and agricultural land requiring mitigation, and the physical and economic impact to communities both residential and commercial interests.

Thank you for the opportunity to comment on this important matter.

Sincerely,

Margaret Ladner
State Director

Enclosures

Preferred Route

Name	*County*	*Township*	*For further study or avoidance*
Rothsay Prairie complex	Wilkin	T136N, R45W	Public land and sites of biodiversity significance proximate to proposed route
Fergus Falls area	Ottertail	T133N, R44W; T133N, R43W T132N, R43W; T132N, R42W T131N, R42W	Public lands proximate to proposed route Public land and portfolio lakes proximate to proposed route Public land and site of biodiversity significance proximate to proposed route
Alexandria area	Douglas	T128N, R39W; T128N, R38W	Portfolio lakes and sites of biodiversity significance proximate to proposed route
Avon Hills area	Stearns	T126N, R29W; T125N, R29W	Public land and sites of biodiversity significance proximate to proposed route

Preferred Route Segment Alternate

Name	*County*	*Township*	*For further study or avoidance*
Avon Hills area	Stearns	T124N, R32W; T124N, R31W; T124N, R30W; T124N, R29N	Public land and sites of biodiversity significance proximate to proposed route

Alternate Route

Name	*County*	*Township*	*For further study or avoidance*
---	Stearns	T126N, R35W; T126N, R34W	Sites of biodiversity significance proximate to proposed route
Avon Hills area	Stearns	T126N, R29W	Sites of biodiversity significance proximate to proposed route

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November 16, 2007

Mr. Craig Poorker
Great River Energy
P.O. Box 238
Elk River, MN 55330-0238

Re: CapX2020

Dear Mr. Poorker:

Thank you for your letter dated July 2007 concerning transmission line permitting. We appreciate your early communication and detailed information about the process.

As you prepare to narrow down the proposed corridors, The Nature Conservancy encourages you to avoid lands of significant conservation value as discussed below.

The proposed study corridors do contain private lands with some of the state's finest examples of the remaining one-tenth of one percent of Minnesota's native prairie habitat. Numerous exemplary natural systems; Minnesota Endangered, Threatened, and/or Special Concern Species; and/or Species of Greatest Conservation Need (state priority species) occur throughout the study areas. Most, but not all, of these areas of concern are documented by the DNR's Minnesota County Biological Survey.

In addition, The Nature Conservancy owns significant land holdings in the proposed study corridors. We manage those lands for wildlife preservation and passive public use. Many of our land holdings were acquired with state and/or federal funds and in many cases represent substantial investments by government agencies to advance public benefits. The State of Minnesota and other partners also own significant conservation lands within the proposed corridors.

The disturbance associated with installation of transmission lines and ongoing access create very real threats of habitat fragmentation and the introduction of invasive species that could have substantial negative impacts on native prairie habitat and species like the greater prairie-chicken. Further, the active prescribed-fire management of these natural systems create a conflict for installation of structures and roads.

The spatial impacts of poles and transmission lines on species and natural communities of concern often extend far beyond the actual facilities. For instance, one of the threats to the greater prairie-chicken (*Tympanuchus cupido*), a Minnesota Special Concern species, is predation from raptors. Electrical power poles provide perching sites from which raptors can

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hunt. Because of this it is recommended that potential raptor perching sites (like transmission lines and power lines) be located up to 3 miles away from native prairie.

We appreciate your open and early information sharing and your desire for public input. We hope you will strongly consider avoiding impact to important sites as identified by the DNR Minnesota County Biological Survey and conservation land holdings in your routing decisions.

We look forward to working with you as the process continues to ensure that the final route avoids impacts on Minnesota's most sensitive natural communities, species, and conservation lands.

Please include us on the mailing list for the Routing process. Please direct correspondence to the following individuals:

Brian Winter
Program Director
The Nature Conservancy
15337 – 28th Avenue South
Glyndon, MN 56547-9561
218-727-6119 ext. 104

Michael Pressman
Director of Protection
The Nature Conservancy
1101 West River Parkway, Suite 200
Minneapolis, MN 55415-1291
612-331-0706

Sincerely,

Peggy Ladner
State Director

CC: Deborah Pile, Minnesota Department of Commerce
Matt Langan, Minnesota Department of Natural Resources

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November 23, 2009

Mr. Scott Ek
Minnesota Office of Energy Security
85 Seventh Place East, Suite 500
St. Paul, MN 55101-2198

Re: Draft EIS of the Brookings to Hampton 345 kV Transmission Line Project

Dear Mr. Ek:

Thank you for the opportunity to comment on the draft Environmental Impact Statement of the proposed Brookings to Hampton Transmission Line Project. The Nature Conservancy appreciates the care and diligence put into the draft EIS. The detailed information, maps, and data were very helpful to us in reviewing the proposed line.

The mission of The Nature Conservancy is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive.

Tallgrass prairie once covered about one-third of Minnesota or approximately 18 million acres. The Minnesota Biological Survey has spent the last 20 years inventorying prairie and other habitat remnants and has found that only 169,500 acres of the original prairie still survive.

The Public Utilities Commission has adopted wind turbine siting guidelines relating to native prairie in Minnesota. In the mitigation sections of the EIS, we encourage you to include a requirement that all transmission lines and associated facilities follow these guidelines as well.

We further note that both the preferred and alternate routes potentially impact Minnesota County Biological Survey sites, notably at the Minnesota River crossings, Granite Falls, and potentially the eastern terminus. We encourage you to include a requirement in the mitigation section for coordination with, review by, and approval of the Minnesota Department of Natural Resources for any potential impacts on County Biological Survey sites, regardless of whether or not it is a protected species under law.

Thank you for the opportunity to comment on this important matter.

Sincerely,

Margaret Ladner
State Director

CC: Randall Doneen, MN DNR

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