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United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Minnesota Valley National Wildlife Refuge
3815 American Blvd E.
Bloomington, MN 55425

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April 30, 2009

Mr. David C. Boyd, Chairman
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
Saint Paul, Minnesota 55101-2147

Re: CapX2020 Transmission Line Placement

Dear Chairman Boyd:

The U.S. Fish and Wildlife Service (USFWS) has reviewed the Route Permit Application for the Brookings County -- Hampton 345 kV Transmission Line. This letter is provided as the consolidated response of the USFWS Ecological Services office and the Minnesota Valley National Wildlife Refuge. Our review and comments are based upon the information available to the USFWS at this time. Our comments focus on transmission line route preference, the Minnesota River valley crossing, potential rerouting of the transmission line, the Rush River environs, and USFWS Wetland Management District (WMD) Waterfowl Production Areas and easement impacts.

At this time the USFWS supports the CapX2020 project using the Preferred Route west of the Helena Substation and the Alternate Route east of the Helena Substation. We support this alignment if the entire Minnesota River valley in the vicinity of the City of Le Sueur is crossed with a non-aerial method. If a non-aerial crossing is not used at this location, we recommend rerouting the proposed transmission line to a location other than the Le Sueur/Highway 169 area. A relatively large year-round bald eagle population, high concentrations of waterfowl during migration periods, and a heron rookery are present within the proposed Le Sueur/Highway 169 project corridor at the Minnesota River valley. Their presence indicates that an aerial valley crossing at this location would have unacceptable adverse impacts.

Should a non-aerial crossing of the Minnesota River valley in the vicinity of Le Sueur/Highway 169 be considered not feasible, we recommend the Preferred Route be followed to a point southwest of the City of Arlington where the transmission line would then be routed north to the Alternate Route. The line routing should occur west of the City of Arlington and this line

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placement should take into consideration the large wetland complexes and water features in this area. The line placement should attempt to avoid all impacts to these water features as well as minimizing aerial impacts to avian species that will move between these water features on the local landscape. Once the transmission line has been routed to the Alternate Route the line should proceed east and cross the Minnesota River within the existing 69kV transmission line Right of Way (ROW) in the vicinity of the City of Belle Plaine. At this river crossing we recommend a non-aerial crossing, also. If this is not feasible, we recommend combining the existing 69 kV with the proposed 345 kV on the same structures. Once the line has crossed the Minnesota River, we recommend that the Alternate Route (southern alignment) be followed to the Helena Substation and then to the project terminus at Hampton.

We recommend the proposed corridor alignment be adjusted to avoid primary and secondary impacts to resources associated with the Rush River. The ravine and wooded habitats associated with the Rush River support quality plant and animal habitat, including bald eagles and other migratory birds. Lands in the Rush River vicinity are considered high value to private and public land resource managers.

The USFWS Big Stone WMD could have one easement affected by using the Alternate Route, but the impacts would be minimal as long as the transmission line crossing remained within the existing ROW. The USFWS Morris WMD has an easement protecting a rock outcropping/high quality bluff prairie community in the Granite Falls area. A power line crossing ROW currently exists on the parcel, and there should be no issues as long as the proposed transmission line stays within that ROW.

The USFWS Ecological Services office, Minnesota Valley National Wildlife Refuge, and USFWS WMDs will provide additional comments as new data becomes available through the Environmental Impact Statement (EIS) process. If aerial river crossing methods are to be considered at the Belle Plaine or Le Sueur/Highway 169 crossings, the Service requests scheduling a formal Public Utility Commission led meeting with representatives from USFWS, Minnesota Department of Natural Resources (MNDNR), Great River Energy, HDR Inc., and other natural resource or regulatory agencies present. Discussions can focus on potential alignment adjustments and considerations within the Minnesota River valley. All notes from this meeting should be part of the official CapX2020 Project Record.

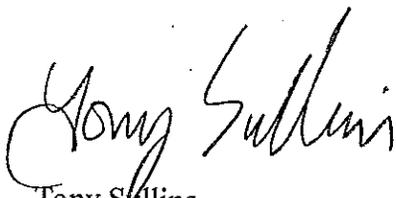
During the review process for the EIS, the USFWS supports an open exchange of information and ideas between the Public Utilities Commission, MNDNR, USFWS and other natural resource or regulatory agencies. We recommend that such exchanges be in the form of inclusive interorganizational meetings or teleconferences. The goal of such exchanges is to find ways for the project proponents to avoid, minimize, and offset adverse project impacts to wildlife and natural resources when selecting final route alignments, river crossing locations, and river crossing methods.

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If you have any questions regarding our recommendations please contact our Ecological Services Field Office at (612) 725-3548. Thank you for including our office in this review.

Sincerely,



Tony Sullins
Ecological Services
Field Supervisor



Charles Blair
Minnesota Valley National Wildlife Refuge
Refuge Manager

Cc: Mathew Langan, Minnesota Department of Natural Resources
Craig Poorker, Great River Energy