



January 14, 2008

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

**Subject: Sierra Club scoping comments on CAP X 2020 Project Certificate of Need (CN-06-1115)**

Dear Mr. Birkholz:

Thank you for the opportunity to participate in scoping for the CAP X 2020 Project's Certificate of Need Application (Project). These comments are provided on behalf of the 25,000 members of the North Star Chapter of the Sierra Club. A central component of the Sierra Club's mission is to practice and promote the responsible use of the earth's ecosystems and resources; we also strive to educate and enlist humanity to protect and restore the quality of the natural and human environment. We offer these comments in that spirit.

The purpose of our 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.

As an initial observation, the Sierra Club understands that because the Applicants intend to develop the Cap X 2020 projects with benefits provided by the US Department of Agriculture Rural Utility Service (RUS) programs, the Department of Commerce is required to prepare its Environmental Report in cooperation with the RUS's preparation of its Environmental Impact Statement required by the National Environmental Policy Act, 42 USC Sections 4321-61 (NEPA).

The Applicants' website at <http://www.capx2020.com/Regulatory/Federal/index.html> includes the following statement:

“Federal Regulatory Filings

There are primarily two permitting and approval processes that involve federal agencies for the Cap X 2020 transmission line proposals. Some of the Cap X 2020 partners will be seeking loans from the Department of Agriculture's Rural Utility Service. In addition permits are required by the U.S. Army Corps of Engineers before transmission lines can cross major Rivers. Before any permits or approvals can be granted by federal agencies, an Environmental Impact Statement is prepared.”

This statement is accordance with RUS Rule 1794.24, which clarifies that that the RUS must evaluate a proposed transmission line project greater than 220 kV and longer than 25 miles to determine whether an



EIS is required. 7 CFR 1794.24<sup>1</sup>. Given the magnitude of the Cap X 2020 proposal, it is certain that the RUS must prepare an EIS.

Under NEPA the RUS is required to consider alternatives to energy projects, including but not limited to alternatives such as energy conservation and efficiency, renewable energy, and non-renewable energy projects, as well as alternative transmission line configurations designed to serve these power supply alternatives. This analysis is markedly similar in scope to the alternatives analysis that the Department of Commerce must include in its Environmental Report<sup>2</sup>. While the State of Minnesota has determined that evaluation of project alternatives and route alternatives may be accomplished separately, the federal government has not.

Minnesota Rule 4410.3900 states the “[g]overnmental units shall cooperate with federal agencies to the fullest extent possible to reduce duplication between Minnesota Statutes, chapter 116D, and [NEPA].” Because applications for high-voltage power lines are not exempt from the requirements of Rule 4410.3900 by Rule 4410.3600, Rule 4410.3900 is applicable such that the Department of Commerce “shall cooperate with federal agencies to the fullest extent possible.” (Emphasis added.) Since this is a mandatory requirement, the Department of Commerce has no option but to cooperate with the RUS in a joint environmental review if doing so is “possible.”

It is entirely “possible” for the Department of Commerce to prepare its Environmental Report in cooperation with the RUS; therefore, Rule 4410.3900 requires that it do so. Nothing in Minnesota law prohibits consideration of all environmental impacts of high voltage transmission lines at the same time. Cooperation in environmental review at an earlier stage in project development would result in earlier review of a broader array of environmental impacts, but this would only enhance the Public Utilities Commission’s ability to consider environmental impacts in its decision about whether to grant a Certificate of Need, which for a project of this scope would be prudent.

A failure to coordinate preparation of the RUS NEPA EIS and preparation of the Department of Commerce Environmental Report would not represent cooperation with federal agencies to the fullest extent possible and therefore would appear to be a violation of Minnesota Rule 4410.3900. Such failure in cooperation would result in duplication of effort because a consideration of project alternatives such as energy conservation and efficiency, provision of power through non-transmission alternatives, and alternative transmission designs would be considered twice, first in the state Environmental Report and then in a subsequent federal EIS. Such duplication would be wasteful and could result in a substantial delay of the project.

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<sup>1</sup> (<http://www.usda.gov/rus/water/regs/Amended%201794.pdf>.)

<sup>2</sup> See e.g., Alternative Evaluation Study prepared for Dairyland Cooperative Power as part of the EIS for the proposed construction and operation of a coal-fired electric generation facility, consisting of a single 400 Megawatt (MW) unit, at a site in Mitchell or Chickasaw Counties, Iowa. Available at <http://www.usda.gov/rus/water/ees/pdf/dairyland%20alternativetechnology.pdf>.



Although it could be argued that the RUS EIS should be coordinated with the state's subsequent route-related environmental review, the nature of this later review does not include the entire scope of the required RUS EIS with regard to alternatives and therefore the state route-related environmental review

will differ substantially from the review that will be conducted by the RUS. Moreover, to the extent that financing of Cap X 2020 is dependent on the RUS federal loan program, such federal environmental review is inevitable. Should the Cap X 2020 applicants claim that all participating utilities can participate without recourse to federal loans, the Application should clarify how this is possible and what effect alternate forms of financing would have on project viability.

The State's ability to comply with its new RES, greenhouse gas emissions law, and energy conservation laws, and the state policy related to promoting community-owned renewable energy generation and its related transmission line siting and design needs requires a greater analysis of project alternatives under MEPA by the Department of Commerce to assess global warming impacts. Precise route configuration is directly related to a transmission line's ability to facilitate renewable energy delivery to market because distance from renewable energy resources to transmission lines impacts interconnection costs that in turn can significantly impact the financial viability of renewable energy development claimed to be benefited by the Cap X 2020 proposal. The amount of renewable energy that a transmission line will facilitate has a direct effect on the line's net global climate change impacts. Therefore, the route and configuration of a transmission line bears a close relationship to its global climate change impacts. As such, a meaningful comparison of the global climate change impacts of alternatives to the project (such as alternative transmission line configurations intended to better serve renewable energy) can only be made with knowledge of preferred routes. The efficiency of bifurcating an analysis of alternatives to the project from alternatives related to route would, therefore, appear to be in doubt.

Therefore, the Sierra Club suggests that the Department of Commerce coordinate the preparation of its Environmental Report with the federal process by immediately contacting the RUS and requesting joint preparation of its Environmental Report with the RUS EIS, including joint scoping efforts. If the Cap X 2020 applicants that intend to apply for RUS loans have not already done so, as a condition of their application the Commission might require that the applicants immediately submit loan applications to the RUS so that the RUS may begin work on the federal EIS and coordinate its efforts with the Department of Commerce.

### **I. Alternatives that should be included in the Environmental Report**

For each of the three proposed transmission lines being considered, the Environmental Report should evaluate a range of alternatives that include energy conservation measures, possible renewable energy sources, and possible fossil fuel-fired energy sources, evaluate these energy supply options in one or more alternatives with different combinations of energy supply options, and identify the combination of these sources of energy that best meet project objectives. Only after doing this analysis is it appropriate to evaluate high-voltage transmission alternatives. It may be that one or more of these energy source alternatives obviates the need for any high-voltage transmission enhancements in one or more Project areas. In such case, one or more of the Project lines would not be needed.



As it considers alternatives, the Environmental Report should also evaluate the environmental impacts of likely possible generation sources for the Project, including renewable energy, new or expanded coal-fired power plants, new or expanded nuclear power plants, and new or expanded natural gas generation. The likely mix of generation sources can be accurately predicted based on FERC open-access tariff rules and relative generation costs.

## **II. Impacts that should be discussed in the Environmental Report**

Building nearly 700 miles of high-voltage transmission lines will have significant impacts on the human and natural environment. Although exact routes for the lines are not yet known, their impacts can still be evaluated in a generic manner and should be included in the Environmental Report.

To assist in the assessment of Project impacts, we have attached an Appendix that lists sensitive, natural or protected areas and features that are within the current Project route corridors. While many of these areas and features will be dropped as the route corridors shrink, the current list gives an idea of the kinds of impacts that could be expected overall from the Project.

The following are impacts that the North Star Chapter of the Sierra Club believes should be included in the Environmental Report being prepared by the Department of Commerce:

### **Impacts on Human Health**

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on human health, including, but not limited to the impacts of noise, fugitive dust, exposure to contaminants or toxic materials, and exposure to electromagnetic fields. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Environmental Justice**

Regardless of the Project's exact route, there will be impacts to the Prairie Island Indian Community. There may also be impacts to the Upper Sioux and Lower Sioux Indian Communities. The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on communities where low-income or minority populations are disproportionately represented. Much of the Project will cross through rural areas, which are generally home to low-income families. The Environmental Justice impacts of the Project should be compared to impacts of alternatives to the Project.

### **Impacts on Global Climate Change**

The North Star chapter of the Sierra Club fervently hopes that if the Project is built, it will be used solely to create greater market access for renewable energy. However, renewable-energy facilities that would use the Project transmission lines are not in operation, but rather are speculative in nature. Therefore, construction of the Project may increase the use of existing coal-fired power plants and promote the construction of new or expanded coal-fired power plants. The emissions from these plants would contribute to global climate change.

To understand the potential impact of the Project on global climate change, the Environmental Report for the Project should assess the global climate change impacts of the use of the Project by both coal-fired



and renewable-energy power plants, as well as the impacts of increased generation and use of electricity. These Project impacts should be compared to impacts of alternatives to the Project.

Given the State of Minnesota's demonstrated commitment to reduce global warming gas emissions, the Environmental Report for the Project should review potential sources of electricity to be transmitted on the Project and assess the propensity of the Project to either promote or discourage the development of renewable-energy power plants, on the one hand, and the use of the Project by existing and future coal-fuel fired power plants on the other.

The State of Minnesota has also recognized that prevention of global climate change is a priority for the State and passed laws in 2007 to help in that regard. The Environmental Report for the Project should assess the Project's impact on the ability of these laws to reduce greenhouse gas emissions.

The impacts on global climate change from greenhouse gases emitted during Project construction, operations, and maintenance should also be discussed in the Environmental Report, including, but not limited to, carbon dioxide emissions and sulfur hexafluoride emissions.

Greenhouse gas emissions during high-voltage transmission line construction can be substantial. An environmental review document published earlier this month by the California Public Utilities Commission and U.S. Bureau of Land Management in regard to a 150-mile long transmission line project in California stated, "because total construction GHG emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact."<sup>3</sup> This was a surprise to many people who thought that because the line was said to be intended to access renewable energy resources, it would cause a net decrease in greenhouse gas emissions.

Given that this first phase of the CAP X 2020 Project would require nearly 700 miles of transmission lines to be constructed—more than four and a half times as many miles as in California—it cannot be taken for granted that the Project, even if it were to be used solely or primarily for renewable energy, would have positive global climate change impacts.

We recognize that evaluating the global climate change impacts of transmission line construction, operations, and maintenance might not be something in which Department of Commerce analysts have had many opportunities to acquire experience. The Department may find it helpful to contact the California Public Utilities Commission manager responsible for the environmental analysis of the California transmission line referenced above, to discuss methodology:

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<sup>3</sup> California Public Utilities Commission and U.S. Bureau of Land Management. *Executive Summary of the Draft Environmental Impact Report / Environmental Impact Statement and Proposed Land Use Amendment for the proposed Sunrise Powerlink transmission line project*. Published January 3, 2008. Page ES-25. Available at <http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/deir/02%20Exec%20Summary.pdf>.



Ms. Billie Blanchard  
Project Manager  
Energy Division CEQA Unit  
Public Utilities Commission

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### **Impacts of Climate Change on Project Design and Construction**

The impact of changing and changed climate, temperature, storm patterns, frequency and intensity on the construction and operation of each of the three proposed 345 kV transmission lines over its lifetime needs to be evaluated. Published reports of power disruptions from storms indicate that the future of overhead power transmission needs to be reviewed. Design and construction may need to be modified. Comparing these to alternatives to the Project is necessary.

### **Other Impacts on Air Quality**

The Environmental Report should discuss the other impacts of Project construction, operation, and maintenance on air quality, including, but not limited to, exhaust emissions and generation of dust. The Project would also utilize available limits of regulated pollutants, thus impacting other businesses and industries that may be competing for these spaces. The air quality impacts of the Project should be compared to impacts of alternatives to the Project.

### **Impacts of Increased Availability of Electricity**

The construction of these lines is intended to make available increased electricity in Minnesota and other areas. The environmental effects of the increased generation of this electricity and the increased use thereof are reasonably foreseeable impacts of the project. NEPA and state law clearly mandate that where there are reasonably foreseeable impacts to the environment of a project, they must be identified and examined<sup>4</sup>.

### **Impacts on Agricultural Sustainability**

The Project will introduce high-voltage transmission lines to agricultural areas, and impact on domestic animals including dairy, beef cattle, hogs, and others needs to be evaluated as part of the environmental impact. Further, the project has the potential to compete with sustainable energy production utilizing biodigesters on farms, cultivation of alternative biomass crops due to possible fire danger to the project, and the construction and operation of lower-voltage feeder lines. These Project impacts need to be compared to impacts of alternatives to the Project.

### **Impacts on Vegetation**

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on vegetation, including, but not limited to, the impacts of rights-of-way, access roads, ancillary support

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<sup>4</sup> Mid States Coalition for Progress v. Surface Transp. Bd., 345 F.3d 520 (8th Cir.2003)



facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Wildlife**

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on wildlife in general, including, but not limited to, habitat reduction, alteration, or fragmentation; introduction of invasive species; injury or mortality of wildlife; erosion and runoff; fugitive dust; noise; exposure to contaminants or toxic materials; exposure to electromagnetic fields, and interference with behavioral activities. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Avian Species**

The Environmental Report should discuss the impacts of Project construction, operation, and maintenance on avian species in general, including, but not limited to, impacts of habitat reduction, alteration, or fragmentation; injury or mortality of birds or bats; erosion and runoff; fugitive dust; noise; exposure to contaminants or toxic materials; exposure to electromagnetic fields; and interference with behavioral activities. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Aquatic Biota**

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on aquatic biota in general, including, but not limited to, impacts of changes in water surface flow patterns, deposition of sediment in surface water bodies, changes in water quality or temperature, loss of riparian vegetation, exposure to contaminants or toxic materials, exposure to electromagnetic fields, restrictions to fish movements, injury or mortality of aquatic biota, and changes in human access to water bodies. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Wetlands**

The Environmental Report should evaluate the impacts of Project construction, operation, and maintenance on wetlands, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). The impacts to wetlands that should be assessed include, but are not limited to, hydrologic impacts, plant community impacts, soil impacts, water-quality and water-temperature impacts, biodiversity impacts, and wildlife impacts. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Forests**

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on forests, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Native Prairie Remnants**



The Environmental Report should assess the impacts of Project construction, operation, and maintenance on native prairie remnants, including, but not limited to, the impacts of rights-of-way, access roads, staging and laydown areas, substations, other ancillary support facilities, and materials mining for construction (e.g., gravel, sand, rock). These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Water Resources**

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on surface water resources, groundwater, aquifers, and floodplains. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Geological Resources**

Construction of the Project will require the use of sand and gravel and/or crushed rock, thus affecting geological resources. The materials are typically used in access roads, staging areas, stream banks, and other construction sites and are for concrete, gravel pads, road beds, stream bank protection, and building materials. Blasting may also be necessary for right-of-way construction. The Environmental Report should assess the impacts of Project construction, operation, and maintenance on geological resources. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Historical and Cultural Resources**

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on historical and cultural resources, including, but not limited to impacts of earthmoving; ground clearing; increased vehicular and pedestrian traffic; changes in human access to historical and cultural resources; visual impacts on sacred landscapes, historic trails, or other viewsheds; and noise impacts on sacred landscapes, historic trails, or other historically or culturally important features; as well as impacts on burial sites, archeological sites, religiously or historically significant sites, traditional plant gathering areas, and habitats of culturally significant animals. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Visual Resources**

The Environmental Report should assess the impacts of Project construction, operation, and maintenance on visual resources, including, but not limited to, the visual impacts of transmission lines and equipment, access roads, staging and laydown areas, substations, other ancillary support facilities, vegetation clearing in rights-of-way, and materials mining for construction (e.g., gravel, sand, rock).. These Project impacts should be compared to impacts of alternatives to the Project.

### **Impacts on Recreation**

The route corridors in the Project Application include lakes, rivers, trout streams, other waterways, state parks, county parks, national wildlife refuges, scientific and natural areas, wildlife management areas, and other places used by the public for recreation. Because high-voltage transmission lines can significantly adversely affect the qualities that attract people to areas used for recreation, the Environmental Report should assess the impacts of Project construction, operation, and maintenance on recreation. These Project impacts should be compared to impacts of alternatives to the Project.





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In addition, the North Star chapter of the Sierra Club would like to receive a hard copy of the Environmental Report when it is ready. Please address the Report to:

Clean Air and Renewable Energy Committee  
North Star Chapter, Sierra Club  
2327 East Franklin, Avenue  
Minneapolis, MN 55406

Thank you for your consideration of our comments.

Sincerely,

Christopher Childs  
Conservation Chair  
North Star Chapter, Sierra Club



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## **Appendix:**

Sensitive, natural or protected areas and features within the current CAP X 2020 route corridors



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**CAP X 2020: Brookings County, SD to Twin Cities line**

All the areas and features below are shown in the route corridor maps filed in the CAP X 2020 project application. Areas and features that appear in **bold** are listed by name in the application narrative. Areas and features in regular font only appear on the route corridor maps. There are many additional water features that appear on the route corridor maps, but are not listed below due to time constraints.

Allsborg Wildlife Management Area  
Altnow Marsh Wildlife Management Area  
Altona Wildlife Management Area  
Amiret Wildlife Management Area  
**Anderson Lake County Park**  
**Anderson Lake Wildlife Management Area**  
Arlington Wildlife Management Area  
Ash Lake Wildlife Management Area  
Assumption Wildlife Management Area  
Baker's Lake Wildlife Management Area  
Bardel's Marsh Wildlife Management Area  
**Baylor County Park**  
**Baylor Regional Park**  
Beaver Falls Wildlife Management Area  
**Black Rush Lake Waterfowl Production Area**  
**Blue Devil Valley Scientific and Natural Area**  
Blue Wing Wildlife Management Area  
Bob Gehlen Wildlife Management Area  
Boerner Wildlife Management Area  
**Boiling Spring Creek**  
Boesch Wildlife Management Area  
**Boon Lake**  
Boon Lake Slough Wildlife Management Area  
Boon Lake Wildlife Management Area  
Boon Lake Waterfowl Production Area  
Boone Slough Wildlife Management Area  
Bossuyt Wildlife Management Area  
Boyd Sartell Wildlife Management Area  
Braake Wildlife Management Area  
Bradshaw Lake Wildlife Management Area  
Brawner Lake Wildlife Management Area  
Bur Oak Wildlife Management Area  
**Camden State Park**  
C. and V. Schmidt Wildlife Management Area  
**Cannon River**  
**Carver Creek**  
Cedar Mountain Scientific and Natural Area  
Cedar Rock Wildlife Management Area



Chadderdon Wildlife Management Area  
Chain-O-Sloughs Wildlife Management Area  
**Chamberlain Woods Scientific and Natural Area**  
Chen Bay Wildlife Management Area  
Christine Wildlife Management Area  
**Chub Lake**  
Chub Lake Wildlife Management Area  
**Chub River**  
Clark Lake Wildlife Management Area  
Clifton Wildlife Management Area  
Collaris Wildlife Management Area  
Collinson Wildlife Management Area  
**Coon Creek Wildlife Management Area**  
Coot Wildlife Management Area  
Cordova Wildlife Management Area  
**Cottonwood Lake**  
**County Ditch 60 (Lyon County)**  
**Credit River**  
**Credit River wetland**  
**Crow River**  
Crow Wing River II Wildlife Management Area  
Daak Wildlife Management Area  
Dalton Johnson Wildlife Management Area  
Daub's Lake Wildlife Management Area  
**Dead Coon Creek**  
Dead Coon Wildlife Management Area  
**Deer Creek (SD)**  
Deer Lane Wildlife Management Area  
Delhi Wildlife Management Area  
Deutsch Wildlife Management Area  
Deutz Wildlife Management Area  
Diamond Lake Wildlife Management Area  
Discors Wildlife Management Area  
Dorer Wildlife Management Area  
**Dutch Creek**  
Dwire Wildlife Management Area  
Dybsand Wildlife Management Area  
Elmer Weltz Wildlife Management Area  
Emerald Wildlife Management Area  
Esker Wildlife Management Area  
Expectation Wildlife Management Area  
Factor Wildlife Management Area  
Faxon Wildlife Management Area  
Faxvog Wildlife Management Area



Fickling Waterfowl Production Area  
Flandreau State Park  
**Fort Ridgely State Park**  
Frank Breen Wildlife Management Area  
Fritsche Creek Wildlife Management Area  
Furgamme Wildlife Management Area  
Gadwall Wildlife Management Area  
Gales Wildlife Management Area  
Garvin Wildlife Management Area  
Glencoe Izaak Walton League Game Refuge  
**Gneiss Outcrops Scientific and Natural Area**  
Good Medicine Wildlife Management Area  
Grandview Wildlife Management Area  
Greenhead Wildlife Management Area  
**Green Valley Wildlife Management Area**  
Grundmeyer Wildlife Management Area  
Halva Marsh Wildlife Management Area  
Hansonville Wildlife Management Area  
Happy Hollow Wildlife Management Area  
Hawks Nest Wildlife Management Area  
**Hazel Creek**  
Hendricks Wildlife Management Area  
Herschberger Wildlife Management Area  
Hoffman Creek Wildlife Management Area  
Hole in the Mt. Wildlife Management Area  
Hope Wildlife Management Area  
Horse Slough Wildlife Management Area  
Indian Lake Wildlife Management Area  
Ivanhoe Wildlife Management Area  
Jacobsen Wildlife Management Area  
Johnsonville Wildlife Management Area  
Joseph R. Brown State Wayside Park  
Katsota Prairie Scientific and Natural Area  
Klabunde Wildlife Management Area  
Kohl's Wildlife Management Area  
Kvermo Wildlife Management Area  
**Karnitz Wildlife Management Area**  
Kujas Lake Wildlife Management Area  
**Lake Benton**  
**Lake Hendricks (SD)**  
**Lake Marion County Park**  
Lake Yankton Wildlife Management Area  
Legacy Wildlife Management Area  
Little Lake Wildlife Management Area



Luescher-Barnum Wildlife Management Area

Lyndwood Wildlife Management Area

Lyons Wildlife Management Area

Lyrock Wildlife Management Area

**Lines Wildlife Management Area**

Mammenga Wildlife Management Area

Mark and Ursel Smith Wildlife Management Area

**Minnesota River** (recreational river near the Minnesota Valley substation; also scenic river state scenic river, state canoe route, and scenic canoe trail in portions)

**Mack County Park**

**Mahoney's Wildlife Management Area**

**Marsh Wildlife Management Area**

McLeod County PF Wildlife Management Area

Meadow Creek Wildlife Management Area

Michel Wildlife Management Area

Milest Wildlife Management Area

**Minnesota River Valley Scenic Byway**

**Minnesota Valley State Park**

**Minnesota Valley State Recreation Area (Lawrence Headquarters, Rush Creek area)**

**Minnesota Valley U.S. Fish and Wildlife Service easements** (near the Minnesota Valley substation)

**Minnesota Valley Wildlife Refuge**

Minnriver Wildlife Management Area

Muldental Wildlife Management Area

Murphy Wildlife Management Area

Muskrat Junction Wildlife Management Area

Neudecker Wildlife Management Area

Norgaard Wildlife Management Area

Norwegian Grove Wildlife Management Area

Nyroca Flats Wildlife Management Area

Oak Isle Wildlife Management Area

O'Brien Wildlife Management Area

Ottawa Wildlife Management Area

**Oxbow Lake**

Paddy Marsh Wildlife Management Area

Pato Wildlife Management Area

**Patterson Wildlife Management Area**

Paulson Marsh Wildlife Management Area

Peat Bog Wildlife Management Area

Pebbles Wildlife Management Area

Penn Wildlife Management Area

PF-Module #1 Wildlife Management Area

PF-Module #3 Wildlife Management Area

**Pleasant Lake**

Poposki Wildlife Management Area



Pothole Wildlife Management Area  
Prohels Woods Wildlife Management Area  
Prairie Dell Wildlife Management Area  
Prairie Heritage Wildlife Management Area  
Prairie Marshes Wildlife Management Area  
**Prairie remnants along the VNSF Railroad tracks near Cottonwood, MN**  
**Preston Lake**  
**Ramsey Creek** (designated trout stream)  
Ras-Lynn Wildlife Management Area  
**Raven Wildlife Management Area**  
**Redwood River**  
Revanche Wildlife Management Area  
**Rice Lake**  
Richter's Woods Park  
Ringneck Ravine Wildlife Management Area  
River Valley Wildlife Management Area  
Robert J. Lick Wildlife Management Area  
**Rock Lake**  
Rock Lake Wildlife Management Area  
Rohlik's Slough Wildlife Management Area  
Rolling Hills Wildlife Management Area  
Romberg Wildlife Management Area  
Rooster Flats Wildlife Management Area  
Rosaasen Slough Wildlife Management Area  
Roseneau-Lambrecht Wildlife Management Area  
Rost Wildlife Management Area  
Russell Wildlife Management Area  
Sacred Heart Wildlife Management Area  
Salix Wildlife Management Area  
Sandy Slough Wildlife Management Area  
Sautter Marsh Wildlife Management Area  
Schindel Wildlife Management Area  
**Schneewind Wildlife Management Area**  
Schmalz Wildlife Management Area  
Shaokatan Wildlife Management Area  
SE Clifton Wildlife Management Area  
Severance Lake Wildlife Management Area  
Sham Lake Wildlife Management Area  
**Sheas Wildlife Management Area**  
Sheas Lake Wildlife Management Area  
Sheridan Wildlife Management Area  
Sibley Wildlife Management Area  
Sioux Lookout Wildlife Management Area  
Sioux Prairie Wildlife Management Area



Sodus Wildlife Management Area  
Sokota Wildlife Management Area  
Somson Wildlife Management Area  
**South Branch Vermillion River**  
**South Branch Yellow Medicine River**  
Spannaus Wildlife Management Area  
Spanton Wildlife Management Area  
Spartina Wildlife Management Area  
Spiering Wildlife Management Area  
**Spring Creek**  
St. Patrick Wildlife Management Area  
**St. Thomas Lake Wildlife Management Area**  
Suhr Wildlife Management Area  
Sumter Wildlife Management Area  
Swan Lake Wildlife Management Area  
Swede's Forest Scientific and Natural Area  
Tangential Wildlife Management Area  
Ten Sloughs Wildlife Management Area  
Thostenson Wildlife Management Area  
**Three Mile Creek**  
Tiger Lake Wildlife Management Area  
Tillemans Wildlife Management Area  
**Timms Wildlife Management Area**  
Two Sloughs Wildlife Management Area  
Tyler Wildlife Management Area  
**Tyson Lake**  
**Upper Sioux Agency State Park**  
Vale Wildlife Management Area  
Ward Lake Wildlife Management Area  
Warsaw Wildlife Management Area  
Waterbury Wildlife Management Area  
Weeks Lake Wildlife Management Area  
Westline Wildlife Management Area  
White Prairie Wildlife Management Area  
Willow Lake Wildlife Management Area  
Windot Wildlife Management Area  
Winfield Wildlife Management Area  
**Vermillion River**  
**Yellow Medicine River**





**CAP X 2020: Fargo to Monticello line:**

All the areas and features below are listed by name in the application narrative. There are many other sensitive resources that appear on the route corridor maps but are not listed here. Because the comment period for this scoping letter was scheduled so that it fell over the winter holidays, thus limiting the public's ability to respond, there was not time to compile a more complete list similar to the Brookings County to Twin Cities list.

**Birch Lake State Forest**  
**Blair Pond Wildlife Management Area**  
**Buffalo River**  
**Buffalo River State Park**  
**Cater Homestead Prairie Scientific and Natural Area**  
**Chippewa River**  
**Clear Lake Scientific and Natural Area**  
**Clearwater River**  
**Crow Wing River**  
**Elk River**  
**Forada Wildlife Management Area**  
**Glacial Lakes State Park**  
**Glacial Ridge Scenic Byway**  
**Harry W. Cater Homestead Prairie Scientific and Natural Area**  
**King of Trails Scenic Byway**  
**Lake Carlos State Park**  
**Lake Maria State Park**  
**Long Prairie River**  
**Mississippi River** (designated scenic river north of Clearwater River)  
**Mustinka River**  
**North Fork of the Crow River**  
**Otter Tail River**  
**Otter Trail Scenic Byway**  
**Pomme De Terre River**  
**Quarry Park Scientific and Natural Area**  
**Red River**  
**Rice Lake Savanna Scientific and Natural Area**  
**Sand Prairie Wildlife Management Area**  
**Sauk River**  
**Sheyenne River**  
**Waite Park Scientific and Natural Area**  
**Western Wild Rice River**



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**CAP X 2020: Twin Cities (Prairie Island) to La Crosse, WI line**

All the areas and features below are listed by name in the application narrative. There are many other sensitive resources that appear on the route corridor maps but are not listed here. Because the comment period for this scoping letter was scheduled so that it fell over the winter holidays, thus limiting the public's ability to respond, there was not time to compile a more complete list similar to the Brookings County to Twin Cities list.

**Amsterdam Prairie (WI)**

**Bell Creek**

**Black River (WI)**

**Brice Prairie (WI)**

**Cannon River** (a scenic river that will be crossed when the line leaves the Prairie Island Indian Community and heads south toward Rochester)

**Cannon River Turtle Scientific and Natural Area**

**Dry Run Creek**

**Garvin Brook**

**Great River Bluff State Park**

**Great River Road Scenic Byway**

**Great River Trail Prairie (WI)**

**Harkcom Creek**

**Hay Creek**

**Holden West Fen**

**Kellogg-Weaver Dunes Scientific and Natural Area**

**Kings and Queens Bluff Scientific and Natural Area**

**La Crosse River Trail Prairie (WI)**

**Lake Byllesby**

**Lake Onalaska**

**Lake Winona**

**Lake Zumbro**

**McCarthy Lake Wildlife Management Area**

**McCarthy Wildlife Management Area**

**Merrick State Park (WI)**

**Midway Railroad Prairie (WI)**

**Oronoco Prairie**

**Oronoco Prairie Scientific and Natural Area**

**Oxbow County Park**

**Perrot Ridge Trail (WI)**

**Perrot State Park (WI)**

**Pine River Creek**

**Plum Creek**

**Red Wing Fen**

**RJD Memorial Hardwood Forest**

**Root River**

**Silver Creek**



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**Tamarack Creek**  
**Thompkins Creek**  
**Tompkins Creek**  
**Trempealeau National Wildlife Refuge**  
**Trempealeau River**  
**Upper Mississippi River Wildlife and Fish Refuge**  
**Van Loon State Wildlife Area**  
**Vermillion River**  
**Waumandee River (WI)**  
**Whitewater River**  
**Whitewater State Park** (identified as an area to avoid—other state parks in the Project route corridors are not so identified)  
**Whitewater Wildlife Management Area**  
**Wisconsin Great River Road**  
**Whitman Dam State Wildlife Area (WI)**  
**Zumbro Lake**  
**Zumbro River**