



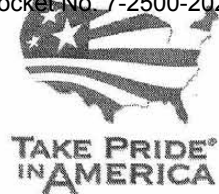
IN REPLY REFER TO

FWS/MNV

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

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



December 3, 2008

Ms. Angela Piner
HDR Engineering, Inc.
701 Xenia Avenue South, Suite 600
Minneapolis, Minnesota 55416

Dear Ms. Piner:

On November 3, 2008, you requested that the Minnesota Valley National Wildlife Refuge and Wetland Management District (Refuge) provide you with comments for use in your route application for the CapX 2020 Project (Project) to the Public Utilities Commission (PUC). As stated in your letter, the purpose of this Project is to install a new 345 kV transmission line between South Dakota and the Twin Cities Metropolitan area of Minnesota with the goal of improving the capacity and distribution of electricity to the Metropolitan area. Your letter states that, if approved by the PUC, the Project is to be implemented in a way that will minimize the impact to the public and public resources, including wildlife and their habitats.

Although the proposed Project consists of a linear corridor crossing the entire south central portion Minnesota, I am responsible for managing U.S. Fish and Wildlife Service (Service) trust resources in Sibley, Le Sueur, Scott, Rice and Dakota Counties so my comments pertain to only this portion of the project corridor. Service trust resources include migratory birds, Federally listed species of concern, and lands owned, leased, or managed by the Service.

Overall Project

Aerial obstructions, including overhead transmission lines and supporting facilities, have been documented to adversely affect migratory birds if those obstructions are not sited or designed to minimize collisions and electrocution. Aerial obstructions are especially hazardous when located in migration corridors, such as river valleys and landscape ridges or passes, and other areas that are especially attractive to wildlife such as wetlands and other waterbodies. As identified in our 2004 Minnesota Valley National Wildlife Refuge and Wetland Management District Comprehensive Conservation Plan, we have plans to continue to acquire lands and develop wildlife habitat resources in the project corridor. Our highest priority areas for acquisition and development in the project area are migration corridors and other areas with high habitat restoration potential. Thus, we have a continuing interest in how project features are sited, designed, constructed, and maintained.

In previous correspondence, we have provided you with a GIS data layer that identifies areas we currently manage and are proposing to acquire in the next few years. As we accomplish our

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annual goals, that data layer is updated and would be available for your use as you refine project plans and design. Service's policy regarding adverse effects on these resources is that effects first should be avoided and minimized. Project features to off-set adverse effects is the least desirable mitigation action.

Proposed Minnesota River Crossings

Your letter of November 3, identified two proposed locations for the project to cross the Minnesota River at the Sibley – Le Sueur County line. These locations are identified as the Le Sueur crossing and the Belle Plaine crossing. In our evaluation of the relative merits of these crossing locations, we considered both the impacts to our trust resources at the crossing-sites and impacts to resources within the project corridor east and west of the river.

Belle Plaine Crossing The Belle Plaine location has more continuous native flood plain habitat than the Le Sueur location. Also, the Belle Plaine location is within the Refuge's authorized expansion area. However, this site has an existing transmission line. During a September 19th on-site meeting, engineers representing Great River Energy stated that the existing line likely would remain at this location and the new 345 kV line would be added directly next to it. This would widen the area cleared of trees and brush and further fragment native floodplain habitat. The new lines likely would be higher in the air than the existing lines and so having both lines at this location would result in obstructions occupying a larger 3-dimensional area than having one transmission line cross the river at a single location. This web of transmission lines would increase the likelihood of strikes by birds using the river corridor.

We have records of individual eagles using the Belle Plaine location and an active nest within a half mile of the location. Although the bald eagle has been delisted under the Endangered Species Act, it is still protected by the Bald Eagle Act of 1940. This Act requires that human activities in close proximity to an active nest be restricted during the bald eagle's mating and rearing season. In the Belle Plaine vicinity this season is approximately from February through July.

Given these considerations, we believe that using the Belle Plaine crossing for this project would have relatively high, unacceptable adverse effects on our trust resources.

Le Sueur Crossing The proposed Le Sueur crossing location supports some native floodplain habitat but includes a water treatment facility and is adjacent to U.S. Highway 169. The water treatment facility is immediately west of the river and next to U.S.169. The facility is scheduled to be decommissioned in the next three to five years. After decommissioning, these lands, which are already cleared of native floodplain habitat, may enable the transmission line to reach the Minnesota River without additional clearing thereby minimizing resource damage. The Le Sueur crossing has the potential for relatively less adverse effects on our trust resources.

In summary, we prefer the Le Sueur crossing and its southern route at this time. Even this route includes sensitive trust resources and the project should be planned with these in mind. Considering that this project will not be completed until 2020 and our very active habitat acquisition and restoration program, it is likely that our trust resources in the project corridor will

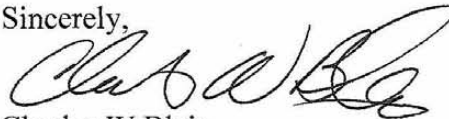
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increase over the next 11 years. We wish to continue to be included in discussions as the Sibley, Le Sueur, Scott, Rice, and Dakota County portions of this project are refined. This way we will be able to provide you with up-to-date information regarding our trust resources and appropriate project mitigation features.

Thank you for the opportunity to comment on this project. If you have questions or need any additional information please contact me at 952.858.5900.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W Blair". The signature is fluid and cursive, with the first name "Charles" being the most prominent.

Charles W Blair
Refuge Manager