

North Route Citizens Alliance

November 29, 2010

Lisa M. Agrimonti
Briggs and Morgan
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402-2157

Re: In the Matter of the Application for a Route Permit for the Fargo to St. Cloud 345 kV Transmission Line Project.

MPUC Docket No. E002, ET-2TL-09-1056

OAH Docket No. 15-2500-20995-2

Dear Ms. Agrimonti

The St. Cloud to Fargo CAPX2020 DEIS includes an analysis of the number of residential structures within 500 feet affected by the proposed HVTL for each route and route alternative. According to the DEIS, the Preferred Route from Sauk Center to St. Cloud includes 83 residential structures within 500 feet and the Alternate A Route 116 residential structures within 500 feet.

NoRCA has conducted an in-field analysis of the number of residential structures "missing" from both the Preferred and Alternate A Routes utilizing the current DEIS Maps, which identify residential structures by a "yellow dot" within the 1,000 foot HVTL easement. NoRCA's analysis has concluded the Preferred Route contains an estimated additional 20 residential structures within 500 feet and the Alternate A an estimated additional 25 residential structures within 500 feet. The additional residential structures "missing" suggest the estimated Sauk Center to St. Cloud Preferred Route and Alternate A total residential structures within 500 feet to be:

Preferred Route: 102 Homes

Alternate A Route: 131 Homes

The revised estimates of the number of residential structures within 500 feet for the Preferred and Alternate A routes compare favorably to the route alternatives to the south of Interstate 94:

Route E: 77 Homes

Route G: 90 Homes

Route H: 100 Homes

In addition, NoRCA has also identified additional "missing" residential structures that exist within the expanded 1.25 mile easement corridor in the eastern Preferred and Alternate A route. The expanded easement area is an area that follows County Road 2 South along an existing 115Kv line, then proliferates for several miles and ultimately reaches the new location of the South St. Cloud Quarry sub-station. There are an additional estimated 23 "missing" residential structures identified in this easement area.

NoRCA has also identified 2 additional Center-Pivot Irrigation systems in the Preferred Route and 3 additional Center-Pivot irrigation systems in the Alternate A Route not included in the Sauk Center to St. Cloud portion of the DEIS.

NoRCA has identified 3 Private Airstrips in close proximity to the Preferred and Alternate A Routes. 2 of these private airstrips, the Skalicky Airstrip (just south of CR 39/238 in Albany Twsp) and the Huls Airstrip (Off of 360th Street in Brockway Township) exist in the Preferred Route. 1 Private Airstrip, the Ebnet Airstrip (just North of CR 17 in Holding Township) exists in the Alternate A route.

In addition, NoRCA has identified a private-zoo, Hemker Zoo, that exists and operates within the proposed 500 foot easement of the Preferred Route along CR 39 just east of Freeport. The Hemker Zoo is home to a selection of endangered species, the Black-footed African Penguin. In September, 2010, the African Penguin was listed as "endangered" under the Endangered Species Act.

NoRCA also identified 3 areas (represented with circled residence on enclosed map) where the Line would appear to be closer than 75' to a Home. Two are located on the preferred route and one is located on the eastern portion of the Preferred and Alternate A route.

The details of NoRCA's findings are enclosed and include detailed maps. Please utilize the attached file (Missing Residence_Complete_Amended_V2) to cross reference to the map that is also enclosed.

In conclusion, each of these analysis continue to suggest the Preferred and Alternate A routes of the CAPX2020 Sauk Center to St. Cloud portion of Fargo To St. Cloud HVTL project as inferior routes to the alternatives, especially to the south of Interstate 94.

Sincerely,

A handwritten signature in blue ink that reads "Brent Schmitt". The signature is written in a cursive, flowing style.

Brent Schmitt
North Route Citizens Alliance
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bschmitt@bernicks.com