



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Mississippi River National Wildlife and Fish Refuge
51 East Fourth Street - Room 101
Winona, Minnesota 55987



February 19, 2008

Pamela Jo Rasmussen
Lead, Siting and Permitting
Xcel Energy
P.O. Box 8
Eau Claire, Wisconsin 54702-0008

Dear Ms. Rasmussen:

In follow-up to our meeting on January 25, 2008, on the proposed Rochester to La Crosse 345-kV transmission line, we offer some initial feedback on Mississippi River crossing options being considered.

My staff and a representative of the Fish and Wildlife Service's Ecological Services program met February 13, 2008, to weigh the various crossing options and other line routing considerations. Staff included managers or staff from the Winona and La Crosse Districts of the Upper Mississippi River National Wildlife and Fish Refuge and Trempealeau National Wildlife Refuge.

We have two overall recommendations: 1) that any crossing considers use of existing energy company rights-of-way or easements, and 2) that any new connecting lines are kept away from the Mississippi River corridor.

Based on these overall recommendations, we believe the Alma crossing may pose the least environmental impact. Since there already exist two permanent rights-of-way or easements for the existing lines (copies attached), with total right-of-way of 180 feet, this route may need no further right-of-way permit from the U.S. Fish and Wildlife Service depending on project design. This route is also least likely to impact migratory birds since it is some distance from known bird concentration points. There is, however, an active eagle nest in or adjacent to the existing powerline on the Minnesota side of the refuge. Appropriate avoidance measures would need to be taken to minimize disturbance to this nest, especially when active.

Our second choice would be the La Crosse crossing since it could follow an existing 69-kV powerline (right-of-way attached). However, this route is of concern due to its proximity to an active eagle nest and great blue heron colony approximately 0.3 miles north (Wisconsin side) and an important heron and egret feeding area adjacent to the line (Minnesota side). There is also a bike/pedestrian trail proposed within the existing right-of-way (Wagon Wheel Trail Bike/Pedestrian Trail) just to the north on land owned by the City of La Crescent and the Service. This proposed trail would be located on a dike just south of the existing 69-kV towers and is known locally as former Stagecoach Road or Minnesota Avenue.

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We also believe that an alternative I-90 corridor using a buried line should be considered with this option in light of above concerns. We suggest a buried line due to the large number of eagles, egrets, herons, and pelicans cross back and forth over the interstate bridges as they use the various sloughs and channels on either side. There is also concern that larger towers and more lines may come into conflict with the La Crosse Airport and Federal Aviation Administration guidelines.

We do not believe the proposed Winona or Trempealeau crossings are worthy of further consideration. Each would likely involve new rights-of-way across portions of national wildlife refuges, and such rights-of-way would likely not be approved since Service policy and regulations do not allow new uses that fragment habitat on refuges. We also have migratory bird concerns with any increase in tower number, size, height, or line configuration within Trempealeau National Wildlife Refuge.

In regard to our second overall recommendation, we believe that lines leading to or from river crossings should use existing line corridors away from the river. For the Alma crossing, we recommend the existing 161-kV line to Waumandee to Blair to Holmen. This or a similar route using existing power line corridors would present the least impacts to migratory birds and other wildlife that concentrate on refuges or state wildlife management areas in or near the river or tributary corridors. This is also in line with our recent recommendation that wind turbines not be located within 10 miles of the floodplain edge due to migratory bird use patterns. We have also enclosed for your information a copy of the existing right-of-way on refuge land across the Black River. For the La Crosse crossing, we would recommend a corridor from Rochester along Interstate 90 since this freeway already presents a known habitat, wildlife, and visual disturbance.

As you move forward with planning, we also encourage you to consider and document the option of arcing or burying crossing lines below the river, removal of existing lines (especially across refuge or wildlife management lands) if no longer critical or doubling is possible on any new line, and discussion on future wind power development or plans. If wind power generation expands in southern Minnesota, how will this play into the proposed 345-kV line and the route selected? Our concern is that wind power generation could fuel the need for another line and crossing, thus causing cumulative impacts beyond the one line being considered at this time.

Finally, this input is to provide you information for planning purposes and does not represent agency endorsement of the proposed project. It also reflects the views of refuges in the project area. Our Ecological Services office has been, and will continue to be, involved in overall review of the project and will likely offer separate feedback and comment as project planning proceeds. Also, there are still concerns with active eagle nests, and interest in reviewing construction methods and timing, tower and line design, required maintenance, and other aspects of the project that are yet unknown. We will continue to review and comment on plans as they develop to ensure minimal impact to refuges and fish and wildlife resources.

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If you have any questions concerning these comments, please feel free to contact me at (507) 494-6218 or via e-mail at don_hultman@fws.gov.

Sincerely,



Don Hultman
Refuge Supervisor/Manager

Enclosures

cc: Matt Cummings, EDAW, Inc.
Chuck Thompson, Dairyland Power
District Managers, La Crosse and Winona
Trempealeau NWR
Twin Cities ES Office