

February 10, 2011

Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 East Capitol  
Pierre, SD 57501 -5070

Re: EL10-016 - In the Matter of the Application of Great River Energy and Northern States Power Company d/b/a Xcel Energy for a Permit to Construct a 10.6 Mile, 345 kV Transmission Line (CapX2020) in Brookings County Near White, South Dakota

Dear Ms. Van Gerpen,

The Nature Conservancy has reviewed the above referenced application and maps showing the intended placement of the centerline of a 10.6-mile high voltage transmission line from Brookings County near White, South Dakota to the state line and offers the following comments about potential impacts to important natural resources.

The Conservancy's main concern is that the intended line placement could negatively impact remaining tracts of native prairie and other native habitats. Therefore, we strongly recommend the line placement and construction avoid all areas of native prairie, pasture, and wetlands. Furthermore, wherever feasible we suggest that Great River Energy and Xcel Energy align the entire 345 kV transmission line within and contain it to the rights of way of existing highways, roadways and/or existing utility easements, other than where resources of statewide significance fall within those rights of way. This should do the most to reduce the impact on native prairie and other natural resources.

The mission of The Nature Conservancy is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Conservancy has identified the Prairie Coteau of South Dakota and Minnesota as a priority conservation area for its invaluable and irreplaceable natural resources. As you may know, some of the largest stretches of unfragmented native tallgrass prairie and prairie pothole wetlands remain on the Prairie Coteau of South Dakota along with viable populations of rare, threatened and endangered prairie obligate species.

The spatial impacts of and the disturbance associated with the installation and maintenance of transmission lines, structures and facilities often extend far beyond the actual infrastructure. In addition, the construction and maintenance of such infrastructure can cause the introduction and spread of invasive species into native habitats, causing permanent damage to the native plant community while increasing landowner/operator maintenance expenses related to chemical or mechanical control of invasive species. The Conservancy is also concerned about the potential impacts to grassland-dependent wildlife species. Desirable grassland bird species such as prairie chickens, sharp-tailed grouse, and songbirds occur in this region and are susceptible to predation

from raptors. Electrical power poles and wires provide perching sites from which raptors can hunt and research has suggested that these species may avoid nesting near such structures.

Because of these potential harmful effects, we recommend that wherever possible the installation of new power lines and other transmission infrastructure avoid crossing areas of native prairie, pasture, and wetlands as well as attempts to avoid road ditches near these habitats. We are less concerned with overbuild projects or projects where installation impacts previously disturbed soils such as cropland or road ditches alongside such previously disturbed soils.

Lastly, during the construction and installation stages of this process, we encourage Great River Energy and Xcel Energy to adopt the siting guidelines developed by the South Dakota Department of Game, Fish and Parks for wind power projects in South Dakota.

Thank you for the opportunity to comment on this important matter.

Sincerely,



Margaret Ladner  
State Director  
The Nature Conservancy  
Minnesota/North Dakota/South Dakota Chapter