

9



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Missouri Ecological Services Field Office  
101 Park DeVillie Drive, Suite A  
Columbia, Missouri 65203-0057  
Phone: (573) 234-2132 Fax: (573) 234-2181



January 12, 2014

John Kuba  
1001 McKinney, Suite 700  
Houston, Texas 77002

Dear Mr. Kuba:

This letter is in regards to the preliminary routing network for the proposed 600 kV Grain Belt Express transmission line from western Kansas to southern Indiana. The preliminary network was presented to my staff on December 5, 2013 during a webinar with representatives from Clean Line and the Louis Berger Group. Also participating in the webinar were staff from the Service's Rock Island Illinois Field Office and from the Missouri Department of Conservation. The comments herein are offered on behalf of the Columbia Missouri Ecological Services Field Office of the U.S. Fish and Wildlife Service (Service) under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347), Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544).

**Western Portion of the Line**

For the western half of the routing network in Missouri (Buchanan County to Chariton County), we recommend selecting the southern route with a terminal slightly east of Keytesville (Figure 1). The northern route intersects the Lower Grand River Conservation Opportunity Area and the Lower Grand River Wetlands Important Bird Area which contain a network of conservation lands including Swan Lake National Wildlife Refuge, Pershing State Park, and Fountain Grove Conservation Area. These lands support large numbers of migratory birds, especially shorebirds, waterbirds, and waterfowl; and birds are known to move between wetlands on these lands and those in surrounding areas. Placing a large transmission line within areas containing large numbers of migrating birds, especially those with long wingspans, heavy bodies, and poor maneuverability (e.g., ducks, geese, pelicans, herons, etc.), greatly increases the likelihood and frequency of collisions with power lines. While various measures can be implemented to reduce these impacts, the most effective measure is to site transmission lines away from these important bird areas.

According to information you provided during the December 5, 2013 webinar, sections of the southern route would parallel an existing right-of-way for the Rockies Express -West pipeline. Because paralleling an existing right-of-way would reduce the amount of fragmentation to

Witness Exhibit No. 17

Date 8-12-14 Reporter \_\_\_\_\_

File No. EA-2014-0207

Schedule TBG-2  
Page 183 of 265

forested habitat, we further support selection of the southern route.

#### **Eastern Portion of the Line**

During the webinar on December 5, 2013, you explained that one of the routes on the eastern half of the line in Missouri (roughly from Moberly to New London) would also parallel an existing right-of-way for approximately 70 percent of the route (Figure 1). While all possible routes for this portion of the line will intersect Indiana bat (*Myotis sodalis*, federally endangered) and northern long-eared bat (*Myotis septentrionalis*, proposed for listing as federally endangered) roosting habitat, this routing option would result in less habitat fragmentation than the other two possible routes. Migratory birds would also benefit from reducing fragmentation of forested habitat. Therefore, we recommend selection of this route for the eastern half of the line in Missouri.

#### **Mississippi River Crossing**

During the webinar on December 5, 2013, you also described options for where the proposed Grain Belt line will cross the Mississippi River. These options include: (1) across McDonald Island near mile 313; (2) north of Saverton Island near mile 303; (3) between Browns Island and Jim Young Island near mile 300; (4) across Blackburn Island near mile 284, also referred to as the Louisiana crossing; and (5) across Pharrs Island near mile 276, also referred to as the Clarksville crossing. You stated that the McDonald Island and the Louisiana crossings have been eliminated from the options, however; thus so our comments pertain only to the remaining three crossings.

With each of proposed options, bald eagles (*Haliaeetus leucocephalus*) have the potential to be negatively impacted by the presence of the transmission lines. Eagles, as well as other migratory birds, can collide with the transmission lines, resulting in injury or death. The height of the structures at the river crossings (estimated as 200-300 feet) will increase this risk given that the probability of bird strikes increases as the height of the structures increase. While not common, electrocution of eagles and other birds with large wingspans can also occur. Based on these risks, we recommend that Clean Line select a route other than the route crossing the Mississippi River downstream of the lock and near Saverton, Missouri (between Browns Island and Jim Young Island near mile 300). At this location, bald eagles are known to occur in high concentrations and may collide with transmission lines even if line markers are employed. Please refer to the Service's Rock Island Illinois Ecological Services Field Office for comments regarding impacts to aquatic species in the Mississippi River, such as the pallid sturgeon (*Scaphirhynchus albus*, federally endangered) and Higgins eye pearl mussel (*Lampsilis higginsii*; federally endangered).

In summary, we recommend selecting the southern route on the west half of the line, the center route on the east side of the line, and a route which does not cross the Mississippi River downstream of the lock and dam near river mile 300 at Saverton, Missouri (Figure 1). While we recognize that all routes will result in some level of impacts to natural resources, we recommend selection of these routes in order to reduce impacts to fish and wildlife resources.

2. *North Saverton (River Mile 303–304)*: A second potential river crossing approximately 1 mile north of Saverton was considered. This crossing includes steep slopes and topography in a densely forested area on the Missouri side, but does not include any floodplain area outside of the edge of the river. The approximate span length across the river is 4,000 feet. On the Illinois side, the route crosses approximately 26,450 feet of floodplain. Landownership on the Missouri side of the river is private and the route crosses the Camp Oko-Tipi, a non-profit youth camp. USACE Rock Island District administers land on the Illinois side of the river and the route crosses an unnamed island. This Potential Route is approximately 2 miles north of the Saverton lock and dam. The USFWS noted the pool, which forms at the head of the lock and dam, is used by wintering and migratory waterfowl.

USACE Rock Island District stated that the land administered by USACE is leased to USFWS and the state of Illinois. In this area, the land use designation is Wildlife Management/Reserve Forest, and USACE maintains the timber rights. Like the northernmost crossing, USFWS also stated this Potential Route may have a higher potential occurrence of both Indiana bat winter hibernacula and summer roosting habitats. In addition, several archaeological sites would require further investigation for this crossing alternative.

3. *South Saverton (River Mile 299–300)*: The third crossing is approximately 2.5 miles south of the town of Saverton. Like the previous crossing, this Potential Route goes from steep topography with dense forest cover to crossing 500 feet of floodplain and the Mississippi River. The Potential Route has an approximate span of 3,370 feet across the river and crosses approximately 36,750 feet of floodplain on the Illinois side. Land ownership on both sides of the river is private; however, the Anderson Conservation Area owned by MDC is located just south of the crossing on the Missouri side of the river. The route also crosses land on the Missouri side of the river owned by Knox County Stone Company, which has an active quarry located just north of the route. A structure would be required on Jim Young Island, which would reduce both the overall span length between structures and their required height.

USACE St. Louis District has jurisdiction over this river crossing (and all crossings further south), although the Rock Island District maintains jurisdiction over the land on the Illinois side of the river. USACE St. Louis District stated a preference for this crossing location.

Similar to the two crossings discussed previously, USFWS noted a higher potential occurrence of both winter hibernacula and summer roosting habitat. In addition, the Saverton lock and dam, a National Register Historic District (also known as Lock and