

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.

We appreciate the opportunity to provide comments on the proposed transmission line and the efforts of Clean Line to reduce impacts to fish and wildlife. If you have questions concerning this response, please contact Trisha Crabill at (573) 234-2132, extension 121.

Sincerely,



Amy Salveter  
Field Supervisor

Enclosures

cc: MDC, Jefferson City, MO (Attn: Policy Coordination)  
USFWS, Manhattan Kansas Field Office, Manhattan, KS  
USFWS, Rock Island Field Office, Rock Island, IL

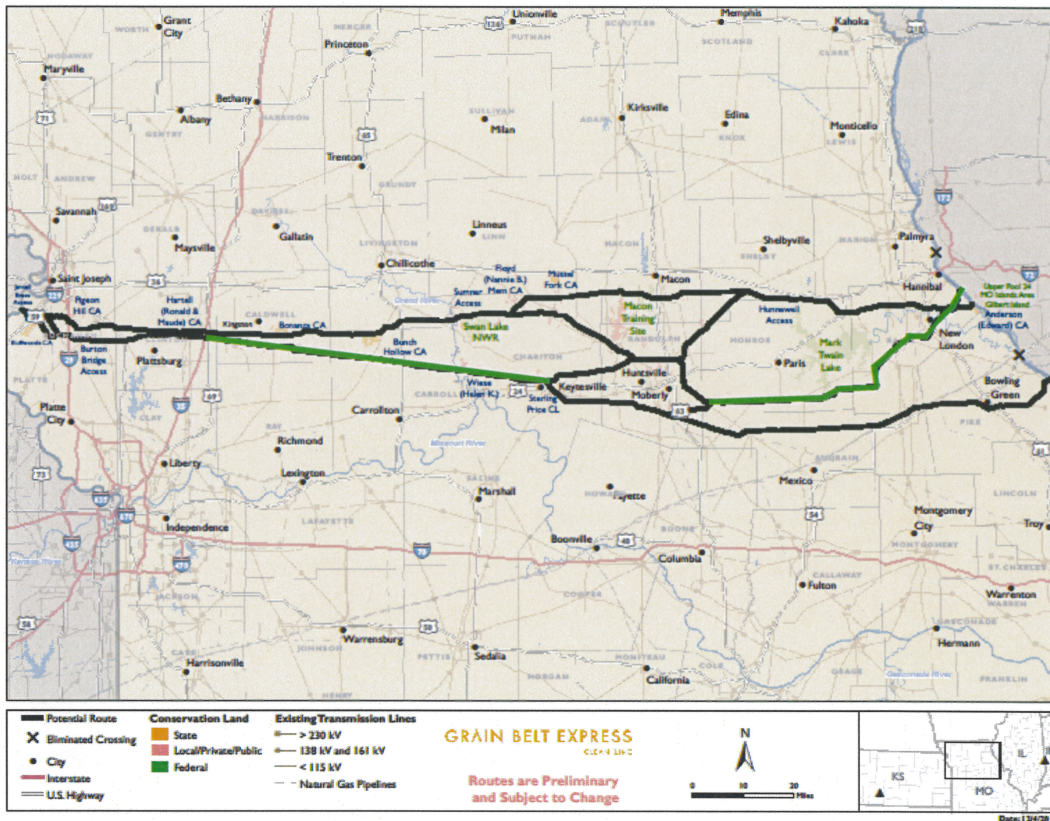


Figure 1. Preliminary routing network for the proposed Grain Belt Express Line, provided during the December 5, 2013 webinar. Highlighted in green are routes resulting in less impacts to migratory birds and federally threatened and endangered species and thus recommended by the Columbia Missouri Ecological Services Field Office of the U.S. Fish and Wildlife Service (Service). Segments with no highlighted routes represent routing options for which the Service has no preference.

February 9, 2011

Mark Frazier  
U.S. Army Corps of Engineers  
Regulatory Division  
Attn: OD-R, Rm 706  
601 E. 12<sup>th</sup> Street  
Kansas City, MO 64106

**Re: Clean Line Energy Partners' Proposed Grain Belt Clean Line Transmission Project**

Dear Mr. Frazier:

Clean Line Energy Partners LLC (Clean Line) is seeking your input on our proposed project to develop, construct and operate the Grain Belt Express Clean Line transmission project ("project"). Clean Line is a privately-owned company focused on developing high voltage direct current (HVDC) transmission lines that would connect the best renewable energy resource regions to communities and cities that have limited access to renewable energy. The proposed project will be capable of moving up to 3,500 megawatts (MW) of renewable energy from the wind-rich region of southwestern Kansas to southeastern Missouri and markets farther east.

Clean Line has retained The Louis Berger Group, Inc. (Berger) to conduct a siting study for the proposed project. We would like to request your comments in the form of an agency coordination letter. The development and environmental permitting process for this project will be a multi-year process, and we are still in a relatively early phase. This coordination will be the first of many opportunities for agencies to participate in the review of this project because Clean Line will need to obtain federal, state, and local permits from the appropriate agencies. A member of our project team will be contacting you in the next few weeks to schedule a follow-up meeting for a more interactive discussion of the project, to present the status of our studies, and to solicit your input on the siting process and corridor alternatives. Construction is anticipated to take approximately two years. Under the current schedule, Clean Line is proposing the project to be in service by the end of 2016.

The Grain Belt Express Clean Line, as currently proposed, will begin near the Spearville substation in Ford County, Kansas and end in southeastern Missouri near the St. Francois substation in St. Francois County, Missouri.

Proposed project facilities include a converter station and possibly ground beds at each terminus, two sets of bundled wire conductors per HVDC circuit, shield wire, and conductor support structures.

