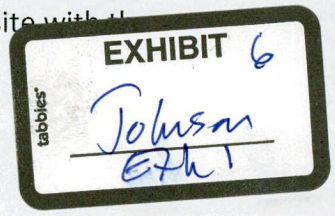
My name is Phyllis Johnson. I am the Vice President for Research and Economic Development at the University of North Dakota. I am also the chair of the University's Field Station Committee, which manages the lands that are used by the university as field research sites, including the Oakville Prairie Field Station site just west of Grand Forks. The field stations are critical parts of UND's research and education infrastructure.

The proposed route for the Enbridge Pipeline crosses three ¼ sections of land in section 16 of Oakville Township that are included in the Oakville Prairie Field Station site. We are not opposed to pipelines as such, but we are deeply concerned about the potential negative impacts of having the proposed pipeline cross this land. It appears that Enbridge made efforts to seek input from several conservation agencies regarding their proposed route and that they are not aware of our use of the site (see p. 57 of Exhibit I2 entitled avoidance areas submitted by Enbridge in January; this land is erroneously listed as School Trust Land). We are extremely disappointed that our input was not sought out regarding this parcel or the wealth of information housed at UND concerning the flora and fauna of the proposed route.

UND faculty were instrumental in acquiring control of Section 16 (T 151 N R 52 W) in 1963 as part of the Oakville Prairie Field Station (which also includes portions of Section 9 to the north). Section 16 contains a rare piece of native grassland that, to our knowledge, has never been tilled. This site is a key part of a nearly 10,000 acre stretch of saline grassland that extends through the middle of Grand Forks County, and which provides unique habitat for native birds and plants. Saline prairie has historically been poor cropland, but its existence is increasingly threatened by modern tiling and drainage techniques that potentially allow such saline land to become economically productive cropland. The entire grassland area is at risk of disappearing, which makes the Oakville Prairie increasingly important. Moreover, this native prairie, which is extremely rare in the region, is part of our state's patrimony. We have inherited it from the original natives of North Dakota and from our homesteader forebears. It is every bit as important, if not more so, as the artifacts in the State Historical Museum in Bismarck.

Oakville Prairie possesses unique ecological characteristics, which includes use by state species of concern and presence of Saline and mesic tallgrass prairie communities. Our records show that 237 species of plants alone have been recorded at this site. As such, this is an important educational, research, and outreach facility for UND. It has been used extensively to provide outdoor laboratory experiences for students in several departments on campus and has been the focus of several faculty research programs since the 1960's. Additionally, the site draws the attention of external researchers. For example, the site was recently visited by a researcher investigating the genetics of the dominant prairie grasses, Big Bluestem and Indian grass, and by a researcher investigating the distribution of an incredibly rare stinkbug. UND has recently submitted several federal grant proposals to conduct research activities on the site with th



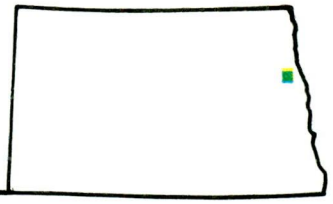
expectation that the site will be left in its current state. Our scientists are concerned that disturbance may promote the establishment of undesired species/noxious weeds and that any mitigation strategy would introduce plant species/genes (i.e. through non-locally sourced seed and improper follow-up management) into the site that were not already present. Additionally, any digging would disturb not only the roots of the prairie plants, which can reach up to 15 feet below the surface, but the unique microbial populations in the soil that are associated with this particular plant community. Thus, disturbance of the Oakville Prairie site would further complicate the ability for the site to serve regional and national research efforts that depend on the ecological, organismal, and genetic integrity of the site.

The question could be asked, "why was the original Enbridge pipeline allowed across section 16 if this is such an important resource to UND?" At the time the original line was constructed, section 16 was School Trust Land and not property controlled by either SBHE or UND. In all likelihood, the State of North Dakota gave approval for the easement and UND was never consulted. With the current proposal, we are concerned about the irreversible consequences of the additional soil disturbance and expanded pipeline management.

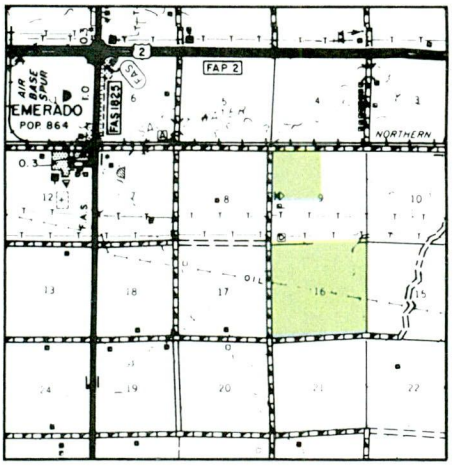
The University of North Dakota strongly urges that the new pipeline be re-routed in such a way as to bypass Sections 9 and 16—a unique grassland whose educational and research value will be compromised if disturbed in this manner. This site makes up part of our important research infrastructure that allows us to study grasslands for the benefit of all North Dakotans. We strongly encourage the PSC to direct Enbridge to contact UND directly regarding their proposal for section 16 and the wealth of information that UND houses regarding the flora and the fauna of the region covered by the proposed pipeline.

Oakville Prairie

by Paul B. Kannowski



Directions: From Emerado, 2 miles east and 1 mile south.



The original grasslands of the Red River Valley, almost entirely destroyed by sodbusting, persisted in a few sites as school sections set aside as hayland for the benefit of the public schools of the state. One of these virgin prairie sites constitutes the main portion of an 800 acre field station of the University of North Dakota. The station is named Oakville Prairie because it is located in Oakville Township of Grand Forks County.

Located on the relatively flat landscape of the Red River Valley, this prairie has developed on a thick and productive black soil representing nearly 10,000 years of decomposed vegetation since the departure of glacial Lake Agassiz. These soils support a colorful variety of prairie grasses and forbs. Big bluestem dominates the upland prairie that also includes green needlegrass, prairie cordgrass, sideoats grama and seasonally important forbs such as Canada anemone, prairie lilies, black-eyed susans, white and purple prairie clovers, prairie coneflowers, Maximilian sunflowers, goldenrods, closed gentians and smooth blue asters.

Lowland prairie has developed on the silty clay loam found at the lower elevations. These soils are poorly drained and have a relatively high water table. The highly saline water in the Dakota sandstone bedrock below reaches the root zone of the plants in the lowland prairie, limiting the variety of vegetation. Inland saltgrass and mat muhly are the dominant grasses; white aster and curly-top gumweed are characteristic forbs. Low spots that collect water in the spring may dry out in late summer leaving a white encrustation of salts on the surface; halophytic plants such as saltwort, sea blite, and inland saltgrass occur around these depressions. The higher water table in the lowland area is responsible for a dense concentration of ant mounds, which extend 12-18 inches above the surface.

Paul B. Kannowski

Two hundred thirty-six species of vascular plants have been recorded from this site. Among the animals found here are 21 species of mammals, including red fox, badger, raccoon and white-tailed deer; more than 40 species of breeding birds, including three species of hawks, sharp-tailed grouse, marbled godwits, magpies, Sprague's pipit, and various sparrows; three species of amphibians; one species of reptile (plains garter snake) and 23 species of ants.

Background Information: One-page map and access information is available. It is used in biology field trips and research projects.

Facilities: None

Ownership and Contact: Owned and maintained by the Department of Biology, University of North Dakota, Grand Forks, ND 58202-8238. Contact Biology Department office in 101 Starcher Hall for map and access information.

DR. PAUL B. KANNOWSKI is chairman of the Biology Department at the University of North Dakota in Grand Forks, N.D. and editor of The Prairie Naturalist.