United States Department of the Interior

FISH AND WILDLIFE SERVICE
Twin Cities Field Office
4101 American Blvd E.
Bloomington, Minnesota 55425-1665

August 14, 2014

ER- 14-0396

Ms. Julie Ann Smith
Environmental Protection Specialist
Office of Electricity Delivery and Energy Reliability (OE–20)
U.S. Department of Energy
1000 Independence Avenue Southwest
Washington, D.C. 20585

Re: Great Northern Transmission Line Project
Roseau, Lake of the Woods, Koochiching, Beltrami, and Itasca Counties, Minnesota
FWS Tails # 03E19000-2013-CPA-0045

Dear Ms. Smith:

This letter serves to follow up on our in-person meeting of August 4, 2014. In that meeting, Minnesota Power, HDR, the Department of Energy (DOE), and the Fish and Wildlife Service (Service) discussed the Great Northern Power Line, its potential impacts to Service interest lands, and possible route alternatives. The Service has previously requested (in letters dated March 14, 2014, and July 1, 2014) that impacts to all Service interest lands should be avoided. Specific recommendations the Service had made to date include:

- In areas where multiple route alternatives exist, the Service recommends alternative with no Service-area land impacts be chosen.
- In areas where the proposed right-of-way (ROW) corridor does not completely bisect refuge lands, the Service recommends the EIS explore the possibility and impacts of utilizing other areas within the proposed ROW to avoid Service lands.
- Where no proposed alternative routes are provided to avoid refuge interest lands, the Service requests that alternative routes be investigated to avoid impacting Service interest lands.

The DOE requested that the Service include specific recommendations of alternate routes to be considered as part of the Environmental Impact Statement (EIS). The Service provides these following recommendations to be included for consideration in the EIS.

1. In areas where Minnesota Power is uncertain if the proposed right of way (ROW) corridor will impact Service interest lands, the Service recommends a formal survey of the parcels in question be conducted. The Service needs to be informed well in advance of a final route decision if Service interest parcels will be impacted. This recommendation applies to (but is not limited to) to following parcels:
    a. Roseau County, T161N/R37W: S13, 20, 21
    b. Lake of the Woods County, T160N/R34W: S11, 13
    c. Lake of the Woods County, T159N/R33W: S24
    d. Lake of the Woods County, T160N/R30W: S27
    e. Koochiching County, T151N/R27W: S34, 35

2. The Service recommends utilization of the proposed "Blue Route" alternative, in order to minimize impacts to refuge interest properties. Additionally, in the western portion of the proposed route in Roseau County (where only one route is proposed), the Service proposes an additional route option. The Service would like the following route option included in the EIS for analysis of impacts:
    a. Starting in Roseau County, T161N/R37W: S10, the Service recommends the proposed GNTL cross the existing 500kv line to the north and proceed east, paralleling the current ROW (north to avoid all refuge interest lands, detailed in attached map #1). This new route alternative would angle slightly south to move between the gap of houses in T161/R36:S 18 and 17. This new route would then run parallel to (but north of) the proposed route and existing ROW until it reaches the existing 230kv line (the light blue/dark blue line). This new proposed route could then either:

        i. Parallel the existing 230 kv line up to T161/R33:S31, where it would angle south to meet back up with the proposed line (but stay north of the existing 500kv line)
        ii. Follow the 230 kv line until the 230 line turns east, at which point this new route alternative would continue south (at T160/R33:S 26) until it joins the proposed blue alternative.
        iii. Follow the alternate proposed route (detailed below in #3).

The service would like the impacts of these alternative routes and associated ROWs analyzed in the EIS. The Service understands there are houses to the north of the proposed line; however, the Service would like the EIS to examine whether the GNTL can be aligned between existing properties. Please note new route options have been developed by the Service, and may not reflect options generated by Minnesota power or their consultants.

3. The proposed route impacts multiple Service interest lands in Lake of the Woods County (T160N/R34W: S2, 3, 11, 12, 13). The Service requests the EIS examine an alternate route that avoids these parcels all together, rather than affecting these parcels and mitigating for the impact. A map of the proposed alternate route is enclosed (map #2). The Service requests the EIS examine the impact and feasibility of this alternative route.

4. For the parcel in question located Koochiching County (T151N/R27W: S34, 35) the Service recommends (after official surveying to determine exact line placement with regard to refuge boundaries) that the ROW be adjusted south to preserve the FWS easement. The Service has provided the shape files of this area to Minnesota Power to help facilitate correct placement of this line outside of the refuge boundaries.

5. For the parcel located in Lake of the Woods County (T160N\R30:S27) the Service recommends shifting the proposed route and ROW south to avoid any impacts to Service interest lands. The Service acknowledges this would create a new ROW and possible habitat fragmentation, but prefers this option to expanding the existing ROW on Service lands.

6. Although the Service recommends that all Service area lands be avoided, we acknowledge some impacts may be unavoidable when calculated against other variables in the EIS. Therefore, we recommend the EIS examine the impact of all proposed routes on Service lands, should a route and ROW be chosen that impact Service lands. Impacts to Service area lands must be analyzed in the EIS so that the amount and type of appropriate mitigation can be determined. Please note that analyzing impacts to Service area lands, issuing special-use permits, and acquiring new lands parcels for appropriate mitigation may take between 18-24 months, once the EIS has been completed. The EIS should reflect this timeframe in the analysis.

Thank you for the opportunity for the Service to comment on specific route alternatives. We look forward to reviewing the draft Environmental Impact Statement for this project.

Sincerely,

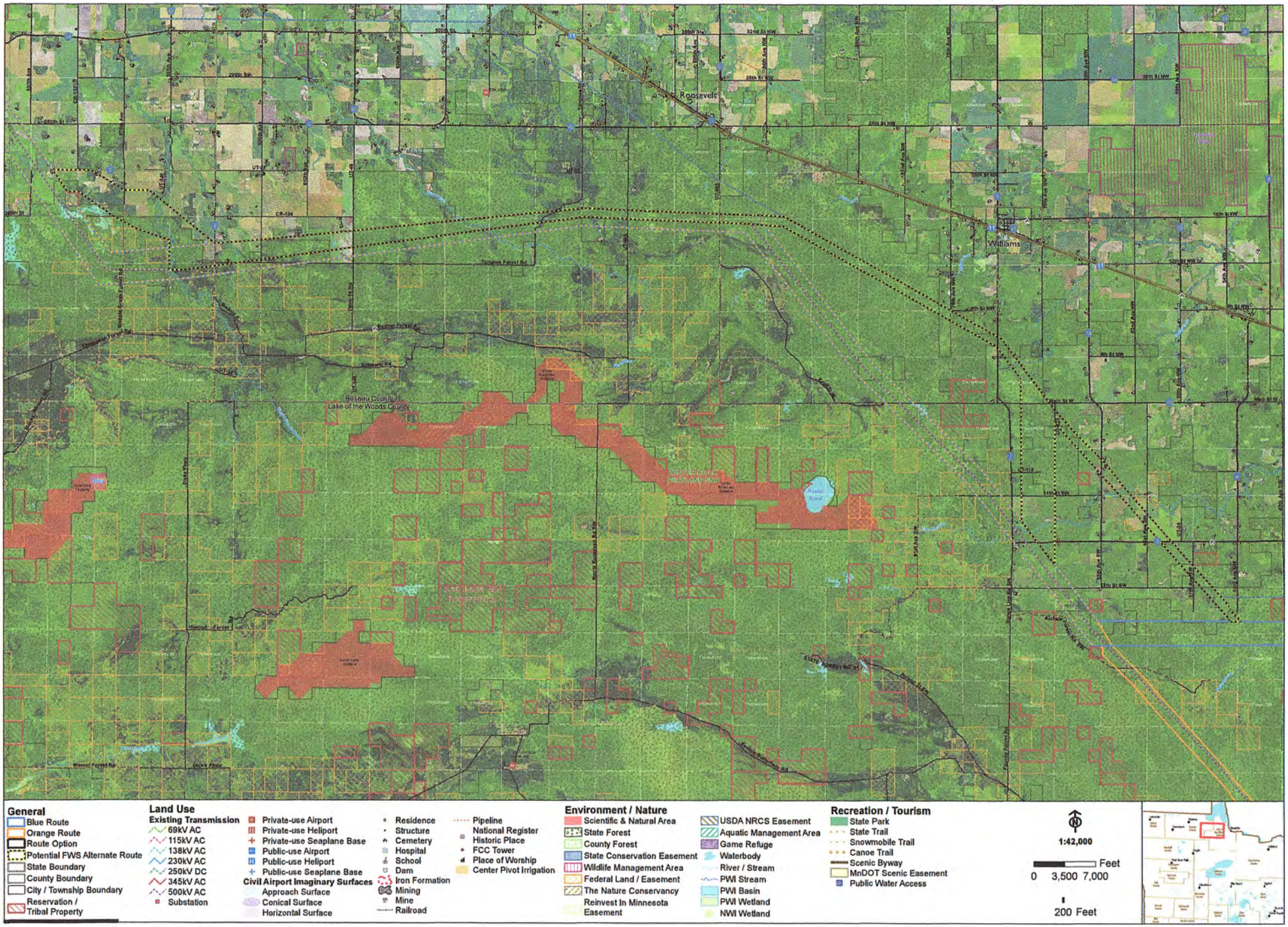
Dan Wales

FOR Lisa Mandell
Deputy Field Supervisor

Encl.: Proposed Alternative Maps (2)

cc (email):
David Moeller, Minnesota Power
Jim Leach, FWS
Richard Speer, FWS
Neil Powers, FWS
Craig Mowry, FWS
Lydia Nelson, HDR

DRAFT Fish and Wildlife Service Proposed Alternatives for the Great Northern Transmission Line #1



General
- Blue Route
- Orange Route
- Route Option
- Potential FWS Alternate Route
- State Boundary
- County Boundary
- City / Township Boundary
- Reservation / Tribal Property

Land Use

Existing Transmission
- 69kV AC
- 115kV AC
- 138kV AC
- 230kV AC
- 250kV DC
- 345kV AC
- 500kV AC
- Substation

- Private-use Airport
- Private-use Heliport
- Private-use Seaplane Base
- Public-use Airport
- Public-use Heliport
- Public-use Seaplane Base

Civil Airport Imaginary Surfaces
- Approach Surface
- Conical Surface
- Horizontal Surface

- Residence
- Structure
- Cemetery
- Hospital
- School
- Dam
- Iron Formation
- Mining
- Mine
- Railroad

- Pipeline
- National Register Historic Place
- FCC Tower
- Place of Worship
- Center Pivot Irrigation

Environment / Nature
- Scientific & Natural Area
- State Forest
- County Forest
- State Conservation Easement
- Wildlife Management Area
- Federal Land / Easement
- The Nature Conservancy
- Reinvest In Minnesota Easement
- USDA NRCS Easement
- Aquatic Management Area
- Game Refuge
- Waterbody
- River / Stream
- PWI Stream
- PWI Basin
- PWI Wetland
- NWI Wetland

Recreation / Tourism
- State Park
- State Trail
- Snowmobile Trail
- Canoe Trail
- Scenic Byway
- MnDOT Scenic Easement
- Public Water Access

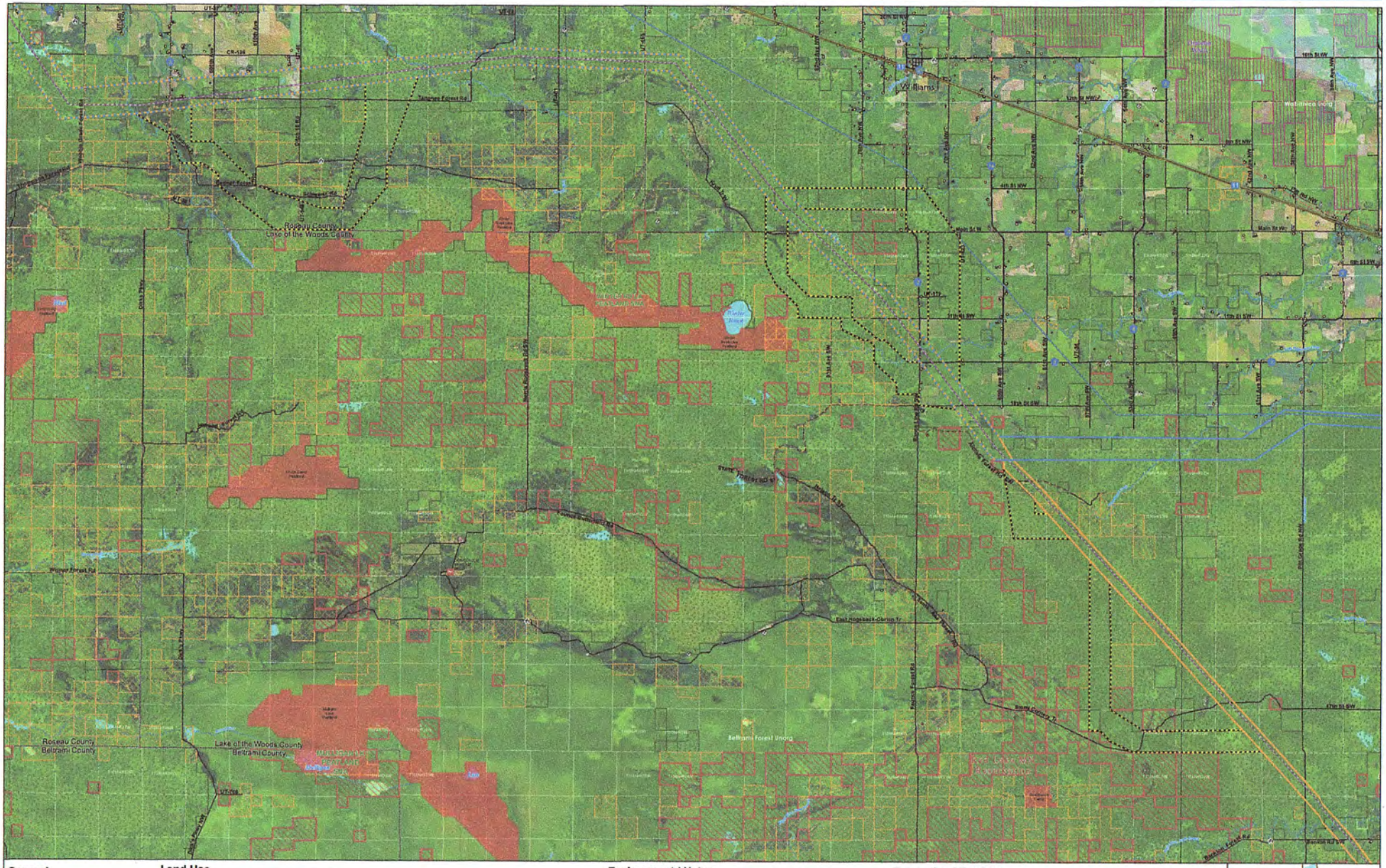
1:42,000

0 3,500 7,000 Feet

200 Feet

DRAFT

Fish and Wildlife Service Proposed Alternatives for the Great Northern Transmission Line #2



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- PWI Stream
- PWI Basin
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- NWI Wetland

Recreation / Tourism
- State Park
- State Trail
- Snowmobile Trail
- Canoe Trail
- Scenic Byway
- MnDOT Scenic Easement
- Public Water Access

1:48,000

Feet
0 3,000 6,000

200 Feet