



United States Department of the Interior

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

November 26, 2014

Mr. Bill Storm
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota 55101

Re: Great Northern Transmission Line Project
Roseau, Lake of the Woods, Koochiching, Beltrami, and Itasca Counties, Minnesota
FWS Tails # 03E19000-2013-CPA-0045
DOE ER:14-0396
PUC Docket: 12-1163

Dear Mr. Storm:

This letter responds to our meeting of November 20, 2014, in which you requested the Fish and Wildlife Service (Service) finalize our route alternative recommendations for the Great Northern Transmission Line Project (GNTL). Line route alternatives will be referred to by the names designated in the November 2014 version of the Scoping Summary Report.

Beltrami WMA Segment 1: The Service wishes this route alternative to be included in the Environmental Impact Statement (EIS) for the GNTL. This route alternative avoids Service interest lands, does not add appreciable length to the proposed line, and makes use of an existing right of way (ROW).

Beltrami WMA Segment 2: The Service wishes this route alternative to be included in the EIS for the GNTL. During our meeting with the Department of Commerce (DOC), they had requested that the Service drop this route alternative from analysis in the EIS. While the Service acknowledges that Beltrami 1 (above) solves the issue of impact to refuge lands, we would still like it included for analysis in the EIS. "Beltrami 1" is the Service's preferred alternative in this area. However, "Beltrami 2" is a secondarily preferred route that would avoid impacts to refuge interest lands. ROW requests on Service lands can only be considered after all other alternatives are fully examined, as well as the potential impact to refuge lands. In order for this analysis to be complete, all alternatives must be analyzed and available to the Service for review.

Beltrami WMA Segment 3: The Service wishes this route alternative to be included in the EIS for the GNTL. During our meeting, the Department of Commerce (DOC) had requested that the Service drop this route alternative from analysis in the EIS. The Service would like this route

alternative included for the reasons listed above (“Beltrami 2”). We additionally recommend a formal survey by the applicant of the parcels in question to determine exact locations of Service lands and the proposed route alternative. Please note this route alternative may still impact some refuge properties (located Tract 160, Range 34, Sections 13-14), which should be reflected in the EIS. The Service requests that the potential alignment of this route be restricted to as narrow a ROW as possible to reduce impacts to refuge lands.

Beltrami WMA Segment 4: The Service wishes this route alternative to be included in the EIS for the GNTL. If “Beltrami 1” (north) is not chosen as the final route alternative for the GNTL, “Beltrami 4” will still allow for the line to connect with “Beltrami 1” (south). This route alternative is not the Service’s first choice of alternate routes, because it will not result in total avoidance of Service interest lands, but “Beltrami 4” will allow for minimization of impacts to Service lands. Again, if ROW access is requested on Service interest lands, we must examine all practicable alternatives to assess impact.

Beltrami WMA Segment 5: The Service wishes this route alternative to be included in the EIS for the GNTL. If the Orange route is ultimately chosen, this alternative will allow for avoidance of refuge interest lands.

Beltrami WMA Segment 7: The Service wishes this route alternative to be included in the EIS for the GNTL. If the Orange route is ultimately chosen, this alternative will allow for avoidance of refuge interest lands.

Beltrami WMA Segment 8: The Service wishes this route alternative to be included in the EIS for the GNTL. If the Orange route is ultimately chosen, this alternative will allow for avoidance of refuge interest lands. We wish to reiterate from our earlier letters (August 14, 2014, Service to Department of Energy) that the Service recommends a formal survey of the parcels in question to determine if Service lands can be avoided. The Service needs to be informed well in advance of a final route decision as to whether or not Service interest parcels will be impacted. The parcel in question is located Lake of the Woods County, Tract 159 North, Range 33 West, Section 24. If it is determined that this parcel can be avoided through an alignment modification within the proposed route, the Service would accept this rather than pursuing “Beltrami 8.” The Service would then request this alignment modification (if chosen) and avoidance of Service lands to be a condition of the State of Minnesota’s permit to the applicant.

Service Lands, Lake of the Woods FmHA parcel: for the parcel located in Lake of the Woods County (Tract 160 North, Range 30, Section 27), the Service has recommended (in our August 14, 2014, letter) the proposed route and ROW be shifted south to avoid any impacts to Service interests 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 interest lands. We additionally recommend a formal survey of the parcels in question to determine if Service lands can be avoided. The Service wishes to further clarify that this should be done as an alignment modification within the existing proposed ROW. The Service would then request this alignment modification (if chosen) and avoidance of Service lands to be a condition of the State of Minnesota’s permit to the applicant.

Service Lands, Koochiching, FmHA parcel: For the Service FmHA parcel located Koochiching County (Tract 151 North, Range 27 West, Sections 26, 27, 34, and 35) the Service has recommended (in our August 14 2014 letter) the proposed route and ROW be shifted south to avoid any impacts to Service interests lands. We additionally recommend a formal survey of the parcels in question to determine if Service lands can be avoided. The Service wishes to further clarify that this should be done as an alignment modification within the existing proposed ROW. The Service would then request this alignment modification (if chosen) and avoidance of Service lands to be a condition of the state of Minnesota's permit to the applicant. Alternatively, a route alternative has been included in the scoping document (The "Northome Segment" Alternative) which would also avoid refuge interest lands. Either option for avoiding this easement is acceptable to the Service.

Additional Items of Concern Raised in the November 20 Meeting

- The DOC has stressed that if the Service preferred alternatives are not chosen, then the GNTL may pass through Service interests lands. The DOC has asked if a ROW agreement can be granted to the applicant. At this juncture, the Service is unable to determine if a ROW agreement will be given. This decision can only be undertaken after the impact of all route alternatives are examined in the EIS and the NEPA process. For this reason, the Service requests the above route alternatives be examined so that an informed decision can be made if the applicant requests a ROW permit.
- The DOC has requested specific information on all Service owned and administered parcels that may be impacted by the GNTL, including ownership, land use types, and restrictions (including but not limited to prohibitions against structures and/or transmission lines spanning the properties). The DOC has specifically asked if it is possible to span the northwest corner of Tract 161 North, Range 37 West, Section 20 *without* a ROW permit if structures are not actually on Service property. The Service will gather this information and provide it to the DOC, as well as the applicant, as scoping and development of the EIS move forward.
- The Service has indicated (in our August 14, 2014 letter) that impacts to Service area lands must be analyzed in the EIS so that the amount and type of appropriate mitigation can be determined. 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 Service requests the EIS should reflect this timeframe in the analysis. The DOC has inquired whether any of the above can proceed concurrently with the EIS and NEPA process. The Service understands this desire to streamline the process, however, until the EIS and NEPA are complete, the Service is not able to analyze impacts to refuge lands, and cannot estimate appropriate minimization and mitigation.
- The DOC has noticed some discrepancies in parcel ownership between the Service records and some county records. The Service will work with the state's consultant

(Barr Engineering) to verify ownership of parcels, and will share this information with the DOC as well as the Department of Energy (DOE).

Thank you for this additional opportunity to clarify our recommendations from earlier letters. We look forward to ongoing participation with the State of Minnesota and the Department of Energy as this project moves forward. Please direct any questions to Mags Rheude of my staff. She may be reached at *Margaret_Rheude@fws.gov*, or at 612-725-3548, extension 2202.

Sincerely,

A handwritten signature in black ink that reads "Lisa Mandell". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Lisa Mandell
Deputy Field Supervisor

cc (email only):

Julie A Smith, U.S. Department of Energy
Brian Mills, U.S. Department of Energy
Rick Speer, U.S. Fish and Wildlife Service
Jim Leach, U.S. Fish and Wildlife Service
Neil Powers, U.S. Fish and Wildlife Service
Craig Mowry, U.S. Fish and Wildlife Service
Cheryl D. Feigum, Barr Engineering